

Ms Gemma Swann
SLR Consulting Ltd
Treenwood House
Rowden Lane
Bradford-on-Avon
BA15 2AU

Our ref: PAN-024031 & PAN-024032

Your ref: EPR/BJ5775IF/V020

Date: 06 August 2024

Sent via email: gswann@slrconsulting.com

Dear Ms Swann,

We need more information about your application

Application reference: PAN-024031 & PAN-024032 (EPR/BJ5775IF/V020)

Operator: Neath Port Talbot County Borough Council

Facility: Materials Recovery and Energy Centre, Baldwins Crescent, Crymlyn Burrows, Swansea, SA1 8PZ

Thank you for your application received on 01/12/2023. I need to ask you for some more information before I can do any more work on it. The additional information required is summarised below, referenced under corresponding sections as numbered within your application.

Section 1 – Non-technical Summary

- Within your application you have stated that the site has undergone operational remodeling works, which were completed in 2023. However, it is not clear how the remodeling works have specifically affected the ongoing waste transfer and material recycling operations on site. Provide further details of the remodeling works undertaken.
- You have stated that annual throughput capacity for the new waste activity operations will be 260,000 tonnes per annum (as existing). Please provide the anticipated maximum daily throughput capacities for both non-hazardous and hazardous wastes to be received, as well as confirm the proposed site operational hours.

Section 2 – Application Forms

- Appendix 2 within Form C4 is blank. Please complete Appendix 2 and submit all relevant documents referenced.

Section 3 - Working Plan

- Your working plan refers to a point source discharge to sewer, and Odour and Dust Abatement Systems, including point source emissions to air from these systems (as referenced within section 5.8), however no further details have been provided. Submit an updated copy of your working plan ensuring the following additional

Ffôn/Tel 0300 065 4419

Ebost/Email Lucinda.hall@cyfoethnaturiolcymru.gov.uk
Lucinda.hall@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Adeilad y Goron, Parc Cathays, Caerdydd, CF10 3NQ
Permitting Service, Natural Resources Wales, Crown Buildings, Cathays Park, Cardiff, CF10 3NQ

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

information is included:

- written descriptions of all abatement systems to be operated on site, along with proposed monitoring for all relevant emissions from these point sources. Details should also be provided on procedures for monitoring bag and carbon filters to determine when they require replacement.
- Written description of how site drainage is managed, both inside and outside of the building. This should include details of any wheel washing, vehicle disinfecting which may take place, and further details of surface water filter and automatic slam shut valve, management of foul water and operational run-off pumps.

Section 4 - Environmental Risk Assessment (ERA)

- Your Environmental Risk Assessment contradicts details submitted elsewhere within your application, (primarily your Working Plan which references abatement systems installed to manage potential impacts from hazards from site operations). Please submit and updated ERA which includes reference to all abatement systems / operational control measures as well as all point source emissions on site as referenced elsewhere within your application. Assessment of all associated risks, potential impacts from hazards identified and details of all appropriate control measures should be provided.
- In specific reference to point source emissions to sewer, you state within your working plan that foul water, collected from within the building, is pumped to holding tank(s) and discharged via existing emission point to sewer (section 4.4.2), however your ERA does not acknowledge or assess any point source emissions from the sites.
- Your application references clean un-contaminated site-run off to a surface water drain(s) and via percolation as well as point source emissions to air from odour and dust abatement systems. We also consider these to be a point source emissions and must be acknowledged and assessed as such within you ERA.
- Your ERA does not consider fugitive emissions from the site. Updated your assessment to assess all potential hazards from fugitive emissions.
- Provide a copy of your current Trade Effluent Consent (TEC) from Dwr Cymru Welsh Water.

Section 5 – Odour Management Plan (OMP)

- Your OMP does not reference odour abatement installed on site, or detail mitigation measures for managing odours from point source emissions from the odour abatement system. Updated your plan to reference all odour abatement systems on site and detail how these will be controlled and monitored.
- Your OMP does not consider how you would manage fugitive odour emissions from the site. Updated your plan to assess all potential fugitive emissions and detail how these will be controlled / monitored / mitigated.

Section 6 - Fire Prevention and Mitigation Plan (FPMP)

- Section 6 of your application appears to be missing. Please submit a Fire Prevention and Mitigation Plan in line with our guidance [Guidance No. 16 Fire prevention and mitigation plan - waste management \(naturalresources.wales\)](https://naturalresources.wales/guidance-no-16-fire-prevention-and-mitigation-plan-waste-management)

Section 8 – Site Condition Report (SCR)

- The Site Condition Report submitted with the application does not contain the level of detail we would expect to support this type of application. We require additional evidence to support sections 4-7 of the SCR as well as completion of sections 8-10 for the operational activities which have ceased on site, and for which equipment and infrastructure has been removed.
- Please provide an updated SCR which includes as a minimum (but limited to):
 - Section 5.1.1 states that there are to be no changes to dangerous substances to be stored on site. Please provide the list of dangerous substances to support this statement.
 - Site records of any pollution incidents which occurred during operational phase of AR1 and AR2 activities (records can include all CAR reports during

this period).

- Decommissioning Plan/Site Closure Plan and removal of pollution risks associated within AR1 and AR2 permitted activities.
- Details of any remediation actions, including cleaning and disinfection of treatment areas, undertaken during decommissioning phase.
- Provide details of all wastes / plant / equipment removed from site, including duty of care documentation of all wastes removed from site (where relevant).
- Information to confirm quality of impermeable surfacing across the site, at details of any remediation / repair works required to ensure impermeable surface remains fit for purpose for on-going operations.

Section 9 - Drawings / Plans

- Section 8 of your application appears to be missing. Please provide all drawings (as summarised within your contents page document), repeated below for ease of reference;
 - Drawing 01 Environmental Site Setting Local Receptors;
 - Drawing 02 Environmental Site Setting Natural and Cultural Heritage;
 - Drawing 03 Environmental Permit Boundary and Site Layout;
 - Drawing 031 Transfer Station Proposed Layout Sheet 1;
 - Drawing 032 Transfer Station Proposed Layout Sheet 2;
 - Drawing 033 Transfer Station Proposed Layout Sheet 3;
 - Drawing 070 Transfer Station Site Drainage Layout Sheet 1;
 - Drawing 071 Transfer Station Site Drainage Layout Sheet 2;
- In addition to the above listed drawings, please also provide:
 - Proposed Site Layout and Point Source Emissions Plan;
 - Process Flow Diagram (PFD) for the waste transfer and material recycling operations.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee.

If you email or write to us please quote the application references **PAN-024031 & PAN-024032** on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions please phone me on 03000 65 4419 or email Lucinda.hall@naturalresourceswales.gov.uk.

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)
Permitting Consultant Installations and RSR Permitting Team

Permitting Service