

Covering letter

Please find below our responses to the not-duly made responses as per Natural Resources Wales (NRW) email, dated 6th August 2024.

It should be noted that this partial environmental permit surrender and variation application seeks to downgrade the risks associated with the site and removes the higher risk activities from the existing permit (in particular the incineration of waste and production of fuel pellets), and seeks to recategorize the site from ‘an installation’ to a ‘waste operation’. This variation seeks to regularise the permit and activities on site through part-surrender and variation of the existing permit.

ref	NRW	Response
1	<p>Section 1 – Non-technical Summary</p> <ul style="list-style-type: none">• Within your application you have stated that the site has undergone operational remodelling works, which were completed in 2023. However, it is not clear how the remodelling works have specifically affected the ongoing waste transfer and material recycling operations on site. Provide further details of the remodelling works undertaken.	<p>The waste transfer and materials recovery operation which is continuing since the completion of the 2022-23 remodelling works is on-going under the existing permit (Ref: EPR/BJ5775IF). A CAR form (attached as Enclosure 01) detailing the works (with photographic evidence) and follow up visit confirming the acceptability of the decommissioning works is included within this response; CAR _NRW0042762 dated 07/11/2023.</p> <p>NRW and the Council acknowledge that the Permit should be regularised to better reflect both the on-going operation and cessation of certain activities and as such, this application is an application for a variation and partial surrender.</p> <p>This position is set out in Section 1.1 with the activities under the current permit and those to be retained following the consideration of the application are set out in Section 3.0 of the NTS (and specifically listed in Tables 1 and 2). The on-going operation, is considered in the ERA and described in detail through the Working Plan (and sub-ordinate plans).</p> <p><i>The following Addendum to the NTS addresses the specific request for more details of the Remodelling Works.</i></p> <p>Addendum NTS</p> <p>3.0.1 2022-23 Remodelling Works</p> <p><u>Demolition, removal and replacement</u></p> <p>The waste processing plant and equipment was replaced with new and out-going plant removed.</p> <p>The out-going plant handled mixed municipal waste and was located throughout the Waste Transfer and Materials Recovery Building consisting of:</p> <p>Conveyors Shredders Screens Picking rooms Over band magnets Eddy Current separators Baler</p> <p>The replacement plant handles co-collected dry-recyclables and is located in Recycling and Bale Storage area (ref Drawing 301) consisting of:</p> <p>Conveyors</p>

	<div>Screens Picking rooms Over band magnets Eddy Current separators Balers</div> <p>The nine in-vessel bio-drying tunnels were removed, together with the associated, leachate management, bio-filter, and feed, discharge and refining plant (Conveyors; Shredders; Over band magnets; Eddy Current separators; Baler).</p> <p>Point source emission A4 (compost system Air Vent) has been removed.</p> <p>Leachate sump and tank have been removed, filled-in in situ.</p> <p>Fuel Prep dust extraction system is not operational. All ducting has been removed. The fans, bag house and stack remain on site and are scheduled for removal under future works. Following the 2022-23 works, there is no point source emission from this stack (A5).</p> <p>The waste to energy plant was removed (which had been mothballed since 2013), together with the associated feed and discharge plant, turbine generator, and air handling equipment including the 40m stack.</p> <p>Emission points A1 and A2 (Incinerator line 1 and line 2 via 40m stack) have been removed.</p> <p>The site is no-longer producing bottom ash nor fly ash</p> <p>The reception and process de-duster system was replaced with new odour and dust abatement system and out-going plant removed. De-duster system vents via 15m stack emission point A3.</p> <p>Floor repairs throughout made good any damage to the floor and maintained an impermeable surface.</p> <p><u>Re-locating recycling reception</u></p> <p>The recycling reception has been relocated from the 2010 Recycling Building (at the rear of the site) to within the Waste Transfer and Materials Recovery Building (ref Drawing 300) consisting of:</p> <div><div>Tipping bays of concrete floors, concrete push walls and Alpha-block separating walls</div><div>The food waste tipping bay is enclosed on three sides and has an enhanced protection finish, drainage and air extraction above (new odour and dust abatement system).</div></div> <p>Prior to the 2022-23 works, there were two baling operations throughout the Waste Transfer and Materials Recovery Building consisting of bale-making and bale storage. The on-going baling operation is located in the Recycling and Bale Storage area (ref Drawing 301) consisting of bale making and bale storage.</p> <p><u>Waste Reception</u></p> <p>Prior to the 2022-23 works the Waste Reception consisted of tipping bays together with certain waste processing equipment, specifically a shredder with OBM and a feed hopper, taking waste beyond the reception hall. As above, this waste processing plant has been removed and the tipping bays remain.</p> <p>Erratum NTS</p>
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		<p>Drawing reference throughout:</p> <p>Remove and replace with:</p> <p>Drawing 031 Drawing 300 - Transfer Station Layout - Sheet 1 Drawing 032 Drawing 301 - Transfer Station Layout – Sheet 2 Drawing 033 Drawing 302 - Transfer Station Layout – Sheet 3 Drawing 070 Drawing 310 – Site Drainage Layout – Sheet 1 Drawing 071 Drawing 311 – Site Drainage Layout – Sheet 2 Drawing 320 – Point Source Emission Layout</p>
2	<p>Section 1 – Non-technical Summary</p> <ul style="list-style-type: none"> 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 throughout capacities for both non-hazardous and hazardous wastes to be received, as well as confirm the proposed site operational hours. 	<p>The existing permit (Ref: EPR/BJ5775IF) allows a maximum throughput of 260,200 tpa of mixed municipal waste, we are not requesting to vary this upper limit as part of our application. As stated in Section 3.1.1 of the NTS</p> <p>With the exception of not more than 2.5 tpa of separately collected household batteries, this will remain a non-hazardous waste operation.</p> <p>There will be no treatment of hazardous waste, batteries, as stated in Table 3 Section 3.4 of the NTS.</p> <p>The Council collects separately presented household recycling (including separately presented household batteries) at the kerbside using multi-compartment, Kerbside Collection vehicles, which are delivered to the Site. The vehicles are weighed in in total (ie each compartment is not weighed in separately), each delivery is given a single weight-in and a single code: EWC 20 03 01.</p> <p>There are no restrictions on plant operating hours under the existing permit, we are not requesting to vary the permitted operating hours.</p> <p><i>The following Addendum to the NTS addresses the specific request for maximum daily throughout capacities and site operational hours.</i></p> <p>Addendum NTS</p> <p>3.1.1 Waste Transfer Station and Materials Recovery Operation</p> <p><i>The following paragraphs are added:</i></p> <p>The anticipated maximum daily throughput capacity is 750 tonnes which will be non-hazardous waste with the exception of some separately collected household waste batteries. Separately collected household waste batteries are delivered to the site at a rate of about 5kg per day, there shall be no treatment of batteries, except bulking up for onward transfer.</p> <p>There will be no change to the site’s operating hours which will remain in accordance with the site’s planning approval.</p>

		<p>9 Vehicles transporting waste and recycled material shall only enter and leave the site, other than on the specific days and times mentioned below, between the hours of 07.30 and 18.00 Mondays to Fridays and between 07.30 and 13.00 hours on Saturdays and not at all on Sundays or Public Bank Holidays. Transportation shall be allowed on the weekend immediately following a Public Bank Holiday on Saturdays between the hours of 07.30 and 18.00 hours and Sundays between the hours of 08.00 and 16.00 hours.</p> <p><u>Reason</u> To safeguard the amenities of residents.</p> <p>Ref P/98/1234</p>
3	<p>Section 2 – Application Forms</p> <ul style="list-style-type: none"> Appendix 2 within Form C4 is blank. Please complete Appendix 2 and submit all relevant documents referenced. 	<p>The site will accept a small quantity of household batteries under hazardous waste codes 20 01 33 and 20 01 34 approximately 2.5 tpa. Appendix 2 of form C4 has been filled in and is included with the submission as Enclosure 02.</p>
4	<p>Section 3 - Working Plan</p> <ul style="list-style-type: none"> 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 information is included: <ul style="list-style-type: none"> 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. 	<p>The operation covered by the current permit allows for:</p> <ul style="list-style-type: none"> Foul and operational run-off to be collected and discharged to the public sewer (point source emission) Surface water to be collected (slam-shut) and discharged to SW drain (point source emission) Odour and dust abatement with point source emission <p>We are not proposing to vary these arrangements</p> <p><i>The following Addendum to the WP addresses the specific request for additional information on the Odour and Dust Abatement System and Site Drainage.</i></p> <p>Addendum WP</p> <p>4.4.1 Surface Water</p> <p><i>The following paragraphs are added to existing 4.4.1:</i></p> <p>Surface water drainage layout is shown in drawings 310 and 311.</p> <p>The site is operated to prevent fugitive emissions to surface water.</p> <p>All waste operations take place undercover, within the Waste Transfer and Materials Recovery building. Surface water will not come into contact with waste.</p> <p>Rain water falling on site buildings is collected in roof gutters and drains to the surface water point source emission W1.</p> <p>Rain water falling on site roads is collected in kerb drains and drains to the point source emission W1</p> <p>Surface water discharge is via an oil interceptor and separator. Suspended solids are allowed to settle out, and a filter removes oil. Silt is removed and tankered off site, and the filter changed regularly.</p>

	<p>Surface water discharge from the site is via a raising main at point source emission W1. The maximum rate of surface water discharge from the site is dictated by the rising main pumping station which has a maximum duty of 2x 14l/sec. The pumping station consists of two automatic pumps providing alternating duty and standby, both pumps running if necessary.</p> <p>The surface water discharge is fitted with a slam-shut devise (AquaSentry). The slam-shut devise is linked to the fire alarm system and will close automatically in the event of a fire on site. The devise will also slam-shut if oil is detected. The above ground control panel is fitted with a flashing alarm, which signals when the devise is shut.</p> <p>On site surface water attenuation of c. 430m³</p> <p>4.4.2 Foul Water and Operational Run-off</p> <p><i>The following paragraphs are added to existing 4.4.2:</i></p> <p>Foul water and operational run-off drainage layout is shown in drawings 310 and 311.</p> <p>Operational run-off is from the transfer operation: tipping and bulking-up of waste deliveries, prior to transfer off site.</p> <p>Run-off is produced on the impermeable floor of the tipping bays, and the baling and bales storage area within the Waste Transfer and Materials Recovery building. Run-off on the floor can drain to floor drains, which in turn drain to a 20,000l holding tank in the site road to the North of the Waste Transfer and Materials Recovery building (the North Road Tank). A mechanical sweeper is used across the floors of all operational areas within the Waste Transfer and Materials Recovery building. Water from the sweeper is emptied into the North Road Tank. Liquid in the North Road Tank is pumped across to the pumping chamber on the South Road and point source emission S1. The level in the North Road Tank is checked regularly and the pump manually activated when necessary.</p> <p>The food waste tipping bay is laid to fall to the rear of the bay and to the sump beyond. Liquid in the sump is automatically pumped to the pumping chamber on the South Road and point source emission S1.</p> <p>There is no wheel wash.</p> <p>Foul water from the staff facilities in the Waste Transfer and Materials Recovery building are also pumped over to the pumping chamber on the South Road and point source emission S1.</p> <p>The pumping chamber on the South Road is fitted with a duty and standby pump.</p> <p>Point source emission S1 is subject to an existing Discharge Consent from the Water Authority.</p> <p>Discharge from S1, together with foul from the office Main Office Building is discharged from site via a rising main. The maximum rate of surface water discharge from the site is dictated by the rising main pumping station which has a maximum duty of 2x 4l/sec. The pumping station consists of two automatic pumps providing alternating duty and standby, both pumps running if necessary</p> <p>4.5.1 Odour and Dust Abatement System</p> <p><i>The following paragraphs are added to existing 4.5.1:</i></p> <p>The Odour and Dust Abatement System installed in 2022-23 replaced an out-going system.</p>
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	<p>The Odour and Dust Abatement System is made-up of two parallel streams each consisting of: dust filtration, carbon deep-bed absorber unit with activated Carbon, and centrifugal extract fan.</p> <p>Both extract fans discharge into the 15m, 1600mm diameter stack (which replaced the out-going 15m stack). Point source emission to air A3.</p> <p>Each filter stream comes complete with blast gate shut-off dampers on inlet and outlet for isolation.</p> <p>One of the two parallel streams draw in air from the residual waste, garden waste, and AHP waste tipping bays, the other stream draws in air from the food waste tipping bay.</p> <p>The dust filter system consists of high capacity dust filters, grade F6 with a total media area 371m²</p> <p>The odour abatement system is an activated carbon bed system consisting of high grade CX65 granular carbon with a total volume 57m³</p> <p>There are 2 no. 75kW extract fans providing a combined duty of approx. 100,000m³/hr</p> <p>The system includes differential pressure gauge which constantly monitor the pressure loss across the filters to pre-warns of clogging. There is an orange 'Filter change' lamp on the control panel that will light up when the filters need changing. Under the current maintenance arrangements, the pre-filter bags are changed every 4 months. These are removed from site to an appropriate facility. Replacement of the carbon bed will be dictated by performance, with reference to post-installation performance monitoring (on-going).</p> <p>The dust emission limits at the emission point will be well within DEFRA guidelines for particulate emissions of 50mg/m³</p> <p>With regard to odour emissions, the carbon filtration system is a recognised "appropriate measure" in H4 and as such provides evidence of control measures.</p> <p>5.8 Point Source Emissions and Monitoring</p> <p><i>The following paragraphs replace existing 5.8:</i></p> <p>Point source emission monitoring requirements are set out in the permit.</p> <p>There are no point source emissions to groundwater or land.</p> <p>Surface water is discharged from the site at point source emission W1 (ref 4.4.1). The site is operated to prevent fugitive emissions to surface water.</p> <p>Point source emission for foul and process run-off is at S1.</p> <p>An odour and dust abatement system is installed to mitigate fugitive emissions. The point source emission to air from the odour and dust abatement system is at A3.</p>
5	Section 4 - Environmental Risk Assessment (ERA)

	<ul style="list-style-type: none"> 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. 	The updated ERA is included within this submission, and can be accessed in Enclosure 03.
6	Section 4 - Environmental Risk Assessment (ERA) <ul style="list-style-type: none"> 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. 	As above
7	Section 4 - Environmental Risk Assessment (ERA) <ul style="list-style-type: none"> 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. 	As above
8	Section 4 - Environmental Risk Assessment (ERA) <ul style="list-style-type: none"> Your ERA does not consider fugitive emissions from the site. Updated your assessment to assess all potential hazards from fugitive emissions. 	As above
9	Section 4 - Environmental Risk Assessment (ERA) <ul style="list-style-type: none"> Provide a copy of your current Trade Effluent Consent (TEC) from Dwr Cymru Welsh Water. 	Please find attached Discharge Consent D87 (Enclosure 04)
10	Section 5 – Odour Management Plan (OMP) <ul style="list-style-type: none"> 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. 	<p>Section 4.2 of OMP describes the Odour and Dust Abatement System. The OMP has been updated as requested as part of this response.</p> <p>Further details now in Addendum 4.5.1 (above). The updated OMP is included as Enclosure 05.</p>
11	Section 6 - Fire Prevention and Mitigation Plan (FPMP) <ul style="list-style-type: none"> 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) 	FPMP is included as Enclosure 09.
12	Section 8 – Site Condition Report (SCR) <ul style="list-style-type: none"> 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): 	The SCR has been updated and is included as Enclosure 06 within this submission.
13	<ul style="list-style-type: none"> 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. 	Please see the updated SCR, included as Enclosure 06
14	<ul style="list-style-type: none"> 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). 	Section 7 states:

		<p>In addition to the fact that there have been none recorded incidents on Envirocheck, the following site incident is noted.</p> <p>Whilst there was a fire on site in August 2003, this was during the commissioning phase, and the site was not yet operational. As such there was only a small volume of waste on site at the time. The fire started in the bio-filter on 11 August 2003 and the fire service attended.</p>
15	<ul style="list-style-type: none"> Decommissioning Plan/Site Closure Plan and removal of pollution risks associated within AR1 and AR2 permitted activities. 	<i>As above</i>
16	<ul style="list-style-type: none"> Details of any remediation actions, including cleaning and disinfection of treatment areas, undertaken during decommissioning phase. 	<i>As above</i>
17	<ul style="list-style-type: none"> Provide details of all wastes / plant / equipment removed from site, including duty of care documentation of all wastes removed from site (where relevant). 	<i>As above</i>
18	<ul style="list-style-type: none"> 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 	<i>As above</i>
19	<p>Section 9 - Drawings / Plans</p> <ul style="list-style-type: none"> 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; <ul style="list-style-type: none"> 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; 	Drawing references have been updated throughout.
20	<ul style="list-style-type: none"> In addition to the above listed drawings, please also provide: <ul style="list-style-type: none"> Proposed Site Layout and Point Source Emissions Plan; Process Flow Diagram (PFD) for the waste transfer and material recycling operations. 	<p>Please find attached:</p> <p>Drawing 320 Point Source Emission Layout (Enclosure 07)</p> <p>Process flow diagram (Enclosure 08)</p>

Enclosures:

Enclosure 01 – Compliance Assessment Report (NRW0042762) and Remodelling Photos

Enclosure 02 – Appendix 2 (Form C4)

Enclosure 03 – Environmental Risk Assessment

Enclosure 04 – Discharge Consent D87

Enclosure 05 – Odour Management Plan

Enclosure 06 – Site Condition Report

Enclosure 07 – Point Source Emission Layout (Drawing 320)

Enclosure 08 – Process Flow Diagram

Enclosure 09 – Fire Prevention Mitigation Plan

History:

Variation and Partial Surrender submitted 1/12/23