

**Miss Siobhan O’Leary-Johns  
Welsh Water Organic Energy Cardiff  
limited  
Tremorfa Anaerobic Digestion Facility  
Tide Fields Road  
Tremorfa  
Cardiff  
CF24 5SB**

**Our ref: PAN-025645  
(EPR/AB3093CA/V004)  
Your ref: EPR/AB3093CA**

**Date: 20/11/2024**

Dear Miss O’Leary-Johns

**We need more information about your application**

**Application reference: PAN-025645 (EPR/AB3093CA/V004)  
Operator: Welsh Water Organic Energy (Cardiff) Limited  
Facility: Tremorfa Anaerobic Digestion Facility, Tide Fields Road, Tremorfa, Cardiff,  
CF24 5SB**

Thank you for your application received on 07/05/2024.

Unfortunately the fee you sent is incorrect. You had used the 2023/2024 charging tool but our fees had increase by 3% (per charge component) on the 1<sup>st</sup> April 2024. Please see the charge tool for 2024/2025 [here](#). As such the fee should be £13,285. Please pay the difference of £389.

I need to ask you for some more information before I can do any more work on it. Provide information on the following:

- 1 Biomass boiler:** In the previous application it was identified that the boiler may have been from another site. You have provided details and reference to a boiler from Five Fords WWTW. Can you confirm:
  - If the boiler being added to the permit is the same one from five forwards.
  - If the boiler is existing or new (including if there has been modification to the MCP that would reclass an existing MCP as a new MCP) as outlined in the section “***When a MCP is classed as new or existing***” in the guidance [Medium combustion plant: when you need a permit - GOV.UK](#).
- 2 Air quality modelling files:** Please provide the model input files to support the air dispersion modelling report submitted with the application.
- 3 Sewer discharge:** submit a copy of the trade effluent consent (TEC) and outline how the site will comply with BAT conclusion 20 and the limits for indirect discharge in the waste treatment [BAT Reference document \(BRef\) published 18<sup>th</sup> August 2018](#).

Ffôn/Tel 0300 065 4448  
Eboost/Email [william.wallace@cyfoethnaturiolcymru.gov.uk](mailto:william.wallace@cyfoethnaturiolcymru.gov.uk)  
[William.wallace@naturalresourceswales.gov.uk](mailto:William.wallace@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](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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

- 4 **Clarification on liquid waste storage:** In your previous application, PAN-018508 and your BAT assessment you made reference to the addition of a liquid waste storage tank alongside the request for the addition of the waste code (02 02 04) but the current non technical summary does not make any reference to the addition of a liquid waste storage tank. Can you confirm for this variation (PAN-025645) either:
- if you are not adding the additional liquid waste storage tank in this variation

or

  - if you are adding the liquid waste storage please confirm this and provide the following information requested in the not duly made letter for PAN-018508 (dated 21/09/2022) shown below:

PAN-018508

*Within your non-technical summary you have indicated that the inclusion of a new liquid storage tank will result in acceptance of between 30–60m<sup>3</sup> per day of liquid waste. By our calculations this will equate to approx. 15,000-21,000 tonnes of liquid waste brought onto site per annum, however it is not clear if this will result in an overall increase in total throughput capacity at the facility, or if the introduction of the liquid waste tonnage will result in a reduction of solid wastes accepted onto site. You have also stated that the liquid waste will replace potable water, which will increase gas yields. Please confirm what the total waste throughput capacity of the site will be, and the anticipated split between solid waste and liquid waste tonnages and anticipated gas yields. If the intention is to increase waste throughput, and increase in gas yields, you will need to submit evidence that shows the sites' design, and infrastructure is capable of accommodating a potential 30% increase in waste throughput. This will need to include evidence that the existing storage tanks (including digesters), gas consumers on site (CHPs, emergency flare) are adequately sized to accommodate the increase in gas production/waste throughput, and that the organic loading rate (OLR) and site retention time will not change as a result of the increase.*

If you need advice about how to complete the form please contact your local area office. Call 0300 065 3000 and ask to speak to your local area office or your site officer.

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 reference **PAN-025645 (EPR/AB3093CA/V004)** 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 0300 065 4448 or email [William.Wallace@naturalresourceswales.gov.uk](mailto:William.Wallace@naturalresourceswales.gov.uk).

Yours sincerely

William Wallace  
Senior Officer, Installation and RSR permitting.