

# DCWW Afan Sludge Treatment Work Permit Application – Response to NRW

<b>NRW reference:</b>	<b>Afan PAN-027050</b>	<b>Date:</b>	<b>28<sup>th</sup> January 2025</b>
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**Table 1: Response to NRW**

<b>Topic of relevancy</b>	<b>Question no.</b>	<b>Question</b>	<b>Response</b>
Letter of authorisation	N/A	The letter of authorisation (and hence the declaration) is invalid	An updated authorisation letter is provided as <b>100123523_MSD_AuthorisationLetter_AFA (NRW letter of authorisation for permitting matters)</b>
CIRIA 736 risk assessments	N/A	The application includes 5 IED CIRIA 736 Risk Assessments for each of the zones on-site. Pragmatic solutions proposed for loss of containment in each document contradicts other reports submitted, including B16399-123532-XX-AB-MA-ZA-OA0038 - Flood Gates Control Philosophy September 2024, which states 100% containment. We need to be clear on what you are proposing.	<p>The 5 IED CIRIA 736 assessments are superseded by:</p> <ul style="list-style-type: none"> <li><b>B16399-123532-ZZ-XX-AS-ZA-CI1012 - Afan ADBA Assessment October 2024</b></li> <li><b>B16399-123532-ZZ-XX-RP-WA-HY1008 - Afan WwTW Sludge Containment Assessment September 2024</b></li> <li><b>B16399-123532-XX-AB-MA-ZA-OA0038 - Flood Gates Control Philosophy September 2024</b></li> </ul> <p>Therefore, the following can be removed from the application</p> <ul style="list-style-type: none"> <li>B14411-123532-ZZ-XX-AS-ZA-CI1010 - Afan CIRIA 736 Risk Assessment - Zone 1 (Imported cake silo).xlsx</li> </ul>

Topic of relevancy	Question no.	Question	Response
			<ul style="list-style-type: none"> <li>• B14411-123532-ZZ-XX-AS-ZA-CI1011 - Afan CIRIA 736 Risk Assessment - Zone 2 (THP feed silo).xlsx</li> <li>• B14411-123532-ZZ-XX-AS-ZA-CI1012 - Afan CIRIA 736 Risk Assessment - Zone 3 (THP).xlsx</li> <li>• B14411-123532-ZZ-XX-AS-ZA-CI1013 - Afan CIRIA 736 Risk Assessment - Zone 4 (Digesters).xlsx</li> <li>• B14411-123532-ZZ-XX-AS-ZA-CI1014 - Afan CIRIA 736 Risk Assessment - Zone 5 (Digested sludge holding tank).xlsx</li> <li>• B16399-123532-ZZ-XX-DR-CA-CI0005.pdf</li> </ul>
Supporting information	N/A	The main supporting document (MSD_AFA_September 2024.pdf) does not correlate with the answers and supporting information referenced within your application form. Unfortunately, we believe this is a result of NRW changing our application forms since your previous application. Whilst we may be able to make some assumptions, we do need some clarification to avoid misunderstandings made by us, and for the public register.	<p>I have spoken to Holly Noble 27/01/25 at approx. 16.00hrs to discuss the issue with addressing these changes. It was agreed that a table referencing the documents, the questions on the form and a commentary on its inclusion would be acceptable. Although, it was also discussed that the new online system was not set up for permit variations of which Afan STC is. This is provided as document reference <b>100123523_Documentreferences_AFA January 2025</b></p> <p>A letter of clarification to confirm that where Dwr Cymru Welsh Water is referenced throughout the report – this should be taken to mean 'Dwr Cymru Cyfyngedig', as per the application form, is provided by James Camis. See document reference <b>100123523 DC Legal entity January 2025</b>.</p>
Charging tool	N/A	Directly Associated Activities (DAAs) listed within section 1.1 of the report do not correlate with DAA's listed on the Charging Tool Spreadsheet submitted with your application. We need you to confirm the DAA's you wish to retain / remove from the permit and list the new DAA's you wish to add. We are currently unable to check whether the application fee you have paid is correct.	<p>The charging tool was completed by James Camis and as it was a new tool the guidance was a little unclear. I did try to speak to someone in NRW on completing this, but the response (over the phone) was not helpful in that we should submit what we think it is and wait to be told if it is correct.</p> <p>We agree that the tool is confusing in what it is asking for with regards to the DAAs for the purposes of the application/assessment in that the tool only asks for new and not existing DAAs.</p> <p>On your advice we have ensured that the DAAs in the report are correct, so that it can then be worked out what the correct fee is required to be paid.</p> <p>The list of DAAs is provided in table 6.1 of the main supporting document (<b>100123523_MSD_AFA January 2025</b>).</p>
Supporting information	N/A	The submitted (attached) Afan WwTW Sludge Containment Assessment Report is a draft version, with numerous review comments still visible that may not be suitable for the public register	A clean version of the Afan WwTW Sludge Containment Assessment Report is provided as <b>B16399-123532-ZZ-XX-RP-WA-HY1008 - Afan WwTW Sludge Containment Assessment September 2024</b> .

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Supporting information	N/A	Update relevant documents	<p>It has been decided to submit the paper forms and withdraw the online version of the application form (excluding uploaded documents). Therefore, the following forms will be included:</p> <ul style="list-style-type: none"> <li>• <b>100123523_App_PartA_AFA September 2024</b></li> <li>• <b>100123523_App_PartC2_AFA September 2024</b></li> <li>• <b>100123523_App_PartC3_AFA September 2024</b></li> <li>• <b>100123523_App_PartF1_AFA September 2024</b></li> </ul> <p>Although not specifically asked at this stage, we have updated the following documents.</p> <ul style="list-style-type: none"> <li>• <b>100123523_ERA_AFA January 2025 – updated to include additional measures for firewater management</b></li> <li>• <b>100123523_ResidueMP_AFA January 2025 – to update text from MSD</b></li> </ul> <p>Further review of the documents submitted has highlighted the following as not having been uploaded.</p> <ul style="list-style-type: none"> <li>• <b>B16399-123532-ZZ-XX-AS-ZA-CI1012 - Afan ADDBA Assessment October 2024 – missed from September 2024 submission</b></li> <li>• <b>100123523 Afan air emissions reporting for 2023 (Jan 2024)</b></li> <li>• <b>100123523 Afan Emissions monitoring August 2023</b></li> </ul>