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Bwrdd Iechyd Prifysgol  
Hywel Dda  
University Health Board

Ein cyf/Our ref: B6IZ1917  
Eich cyf/Your ref: PAN-005627

Dyddiad/Date: 23 August 2019

Swyddfeydd Corfforaethol, Adeilad Ystwyth  
Hafan Derwen, Parc Dewi Sant, Heol Ffynnon Job  
Caerfyrddin, Sir Gaerfyrddin, SA31 3BB

Corporate Offices, Ystwyth Building  
Hafan Derwen, St Davids Park, Job's Well Road,  
Carmarthen, Carmarthenshire, SA31 3BB

**PRIVATE AND CONFIDENTIAL**

Louise Bailey  
Wales Permitting Centre (Cardiff)  
Natural Resources Wales  
Cambria House  
29 Newport Road  
Cardiff  
CF24 OTP

Dear Ms Bailey

**Environmental Permitting (England and Wales) Regulations 2010**

**Application to vary a Bespoke Permit: A11 - Household, commercial and industrial waste transfer station (74,000 tonnes per annum) at Pembrokeshire County Council Waste Transfer Station, Unit 41, The Dockyard, Pembroke Dock, Pembrokeshire, SA72 6TD.**

We welcome the opportunity to comment on this permit application. We have consulted with our colleagues at the Environmental Public Health Service (delivered collaboratively through Public Health Wales' Health Protection Team and Public Health England's Centre for Radiation, Chemical and Environmental Hazards Wales).

This assessment is based on actual or potential health risks from environmental exposures to chemicals, noise and extreme environmental events such as flooding.

Proposed Development

The site currently operates under an environmental permit originally issued to Pembrokeshire County Council in January 2015 that permits the site to operate as a waste transfer station for the acceptance of non-hazardous household, commercial and industrial waste. The applicant is proposing to vary the permit to change the permitted area, expand the waste types accepted (those found in domestic refuse and electrical equipment including batteries) on site and revise the treatment operations to allow only for baling of waste. There is proposed change to the total annual throughput (74,000 tonnes per annum).

The site is situated in the Dockyard of Pembroke Dock, the immediate surrounding land use is predominantly industrial/commercial with a residential area (c.200m) and South Pembrokeshire Hospital (c.60m) to the south and Milford Haven waterway to the north.

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Cadeirydd / Chair  
**Miss Maria Battle**

Prif Weithredwr/Chief Executive  
**Mr Steve Moore**

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## Overall Conclusion

We have no grounds for objection based upon the public health considerations contained within the application and provided the site is operated in line with current sector guidance.

## Public Health Risk Assessment

The site will operate to the requirements of the applicant's environmental management system (EMS) and be supervised by WAMITAB certified staff. **We would recommend that the operator seeks suitable accreditation for the environmental management system within an agreed timescale.**

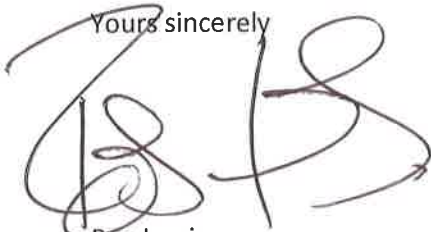
The applicant has provided a risk assessment for all potential activities concluding that risks will not be significant. Waste fires can burn for extended periods resulting in considerable impact upon local communities and infrastructure. **The applicants fire risk assessment has followed the regulators guidance *Fire Prevention & Mitigation Plan Guidance – Waste Management*, in view of the potential local impact from a fire and to minimise risks the Regulator must ensure that the operations are managed in accordance with current guidance.**

The findings of the odour assessment identify the potential for increased odour exposure for industrial receptors located to the north (due to the location change of residual black and orange bag waste handling operations), however the sensitivity of these receptors is considered low. The site will continue to accept food waste that has a high potential for nuisance odour generation. The site has been subject to complaints under the previous operator. **The applicant has detailed an odour management plan, the regulator should be satisfied the controls are suitable for the operations proposed.**

The site lies within the port and there are variety of existing noise sources. The impact from noise had been assessed using recognised methodology and the impact to noise sensitive receptors is considered negligible. **The Regulator should be satisfied that suitable management controls are included for all operations to ensure mitigation of noise.**

We trust this will help with your overall decision and would be happy to review any additional information obtained by the Regulator in relation to these comments.

Yours sincerely



Ros Jervis

Director of Public Health

Hywel Dda University Health Board

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