

09 October 2019

Louise Bailey  
Natural Resources Wales  
By Email Only

Our Ref: 416.00798.00037

Your Ref: PAN-005627

Dear Louise,

**RE: PEMBROKESHIRE COUNTY COUNCIL – ENVIRONMENTAL PERMIT VARIATION APPLICATION, SCHEDULE 5 NOTICE**

We are writing on behalf of Pembrokeshire County Council (PCC) in response to the request for further information in the Schedule 5 Notice issued on 17<sup>th</sup> September 2019, in support of the Environmental Permit (EP) variation application for the Pembroke Dock site.

For clarity, the questions from Natural Resources Wales (NRW) are listed below in italics with the response from SLR shown in blue.

## Document 5: Environmental Risk Assessment

- 1. Section 3.6.1 refers to a timber pond, is this the same pond that is called the pickling pond elsewhere in the risk assessment and other application documents?*

### SLR Response

Section 3.6.1 has been updated to say Pickling Pond. The updated Environmental Risk Assessment (ERA) is included as Enclosure 1 to this letter.

- 2. Table 4.2 to water section. The 3rd and 4th paragraphs regarding discharges from the site require clarification. Drawing 004 appears to show 3 surface water discharge points into the pond.*

*Please confirm if:*

- (a) paragraph 3 relates to discharge point 2, which is plugged*
- (b) paragraph 4 relates to discharge point 1 and is open*
- (c) discharge point 3 doesn't appear to have been addressed.*

### SLR Response

- (a) We can confirm that paragraph 3 relates to discharge point 2 and is plugged.
- (b) We can confirm that paragraph 4 relates to discharge point 1 and is open (only clean surface water and rainwater from roofs to be discharged).
- (c) We can confirm that discharge point 3 is for surface water from the car park into the pickling pond.

3. *You have identified that the site is within the relevant distances of the Milford Haven Waterway SSSI and Pembrokeshire Marine/Sir Benfro Forol SAC. However, you have only addressed the SSSI as a receptor in regard to discharge to water and have made no mention to the SAC. As you are expanding the site and reducing the distances to the SSSI and SAC we have to assess the risks from your activities. You need to supply further information paying special attention to why these sites are designated, and what measures will be in place to avoid harm.*

### SLR Response

Section 3.5.1 provides details on the Milford Haven SSSI and provides a description of the reasons the area is designated. Section 3.5.2 provides details on the Pembrokeshire Marine/Sir Benfro Forol SAC and provides a description of the reasons the site is designated.

All receptors in Table 3-2 were considered when undertaking the Environmental Risk Assessment. The risk management measures detailed within Tables 4-1 to 4-4 will be implemented to reduce the risk of potential harm to all receptors included within Table 3-2 (including the SSSI and the SAC).

The text in the receptor column in Tables 4-1 to 4-4 has been updated to state all receptors in Table 3-2 or to confirm that the SSSI and the SAC have been assessed.

## **Document 4: Operating Techniques**

4. *Figure 2- site plan for Unit 41- see comments below under section for Document 11 WRML-PDOCK37N Unit 41 Layout.*

### SLR Response

Figure 2 has been replaced within the Operating Techniques (OT) document with an updated plan for Unit 41. The updated OT document is included as Enclosure 2 to this letter.

5. *Figure 3- site plan for Units 29 & 29A- see comments below under section for Document 11 WRML-PDOCK34F Unit 29 & 29A Layout*

### SLR Response

Figure 3 has been replaced within the OT document with an updated plan for Units 29 and 29A.

6. *Figure 4- drainage plan-. This plan is not clear and does not cover all of the proposed permitted site.*

### SLR Response

Figure 4 has been replaced within the OT document with a copy of Drawing 004 which shows the full site drainage.

7. *Section 2.2.3 Unauthorised waste and Section 3.4.2 Load inspection and waste control refer to a designated quarantine area within the permit boundary. Where is this area? Drawing 004 only shows a Fire Management Quarantine Area.*

## SLR Response

Section 2.2.3 has been updated to reflect the procedure for handling non-compliant waste.

- 8.** *Section 2.2.4 Fire Prevention & Mitigation Plan (FP & MP) states that flammable waste will not be accepted at the site. Please clarify what you mean by this as many of the wastes you propose to accept can be easily set on fire.*

## SLR Response

Section 2.2.4 has been updated to reflect that visibly flaming/smoking wastes, as opposed to 'flammable' wastes, will not be accepted on site.

- 9.** *Section 2.2.4 Fire Prevention & Mitigation Plan (FP & MP) refers to areas of the site having hardstanding. We consider hardstanding to not be impermeable and will allow liquids to permeate through and soak to ground. Please confirm if this should read "impermeable".*

## SLR Response

Section 2.2.4 has been updated to reflect that the surfacing is impermeable.

- 10.** *Section 3 Process Description states the objective of the activities is to manually separate the waste types, and that manual picking will be employed. Different documents within the application have sorting, bailing and bulking up as treatments in differing combinations. Please clarify what treatments you wish to be included in the permit, whether they are to be manual or mechanical (or both), and what wastes would be submitted to each treatment (as this may be relevant to Industrial Emissions Directive limits).*

## SLR Response

Section 3 of the OT has been updated to confirm that the only treatment activities undertaken on site are baling and bulking up. A small amount of contamination may be removed from a load on an ad hoc basis however this is not considered to be a specific treatment activity. Wastes received on site are pre-segregated before arrival and therefore do not require any manual sorting or separation on site.

There is no pre-treatment of waste for incineration or co-incineration.

- 11.** *Section 3 Process Description states that biodegradable kitchen and canteen waste will be tipped on the floor before being moved into the container as soon as reasonably practicable. Please confirm the maximum length of time this waste may be stored outside of the container.*

## SLR Response

Section 3 of the OT has been updated to confirm that food waste will remain on the floor within the designated bay for a maximum of 1 hour.

- 12.** *Section 3 Process Description states AHPs will be tipped onto the floor (presumably the area shown on Document 11 WRML-PDOCK34F Unit 29 & 29A Layout), and then placed in a skip. Where will the skip be stored?*

### SLR Response

The location of the AHP skip is now shown on Drawing WRML-PDOCK34M which is included as Enclosure 3 to this letter. The drawing number has changed from WRML-PDOCK34F to WRML-PDOCK34M to reflect the addition of the electrical box in Unit 29 that was discovered during preparatory works on site.

- 13.** *Section 3.2 Table S1.1. The table shows the permitted activities being applied for which includes limits specifying that non-food waste can be stored outside. The rest of the application documents indicates that all wastes will be stored in a building (not including glass stored under an exemption). Please confirm if you are intending to store wastes outside, or if this table was just copied from the existing permit with only the treatment types being amended.*

### SLR Response

There will be no waste stored outside the building (with the exception of glass stored under the exemption). The table in section 3.2 was copied from the existing permit.

- 14.** *Section 3.2.1 Permitted types and quantities of waste. Please confirm if the metal waste codes in this list (15 01 04, 19 12 02, and 19 02 03) are for the waste cans referred to in section 3 of this document and in the layout plans for the buildings. 20 01 40 cannot be used for cans as packaging in its original form should be listed under the 15 01 codes.*

### SLR Response

20 01 40 is included within the waste list to cover the acceptance of foil. 19 12 02 and 19 12 03 are included for the acceptance of scrap metal. Waste cans will be accepted under the correct 15 01 code.

- 15.** *Section 3.2.1 Permitted types and quantities of waste. Waste codes 20 01 99 and 20 03 01 are asterisked, an asterisk is normally used to signify a hazardous waste code. 20 01 99 and 20 03 01 are not hazardous waste codes, please confirm what the asterisks means.*

### SLR Response

The asterisk for the waste code 20 03 01 was used to differentiate this from the existing 20 03 01 code that currently limits the acceptance of mixed municipal waste to 'general black bag waste or HWRC residual waste only'. The asterisk for 20 01 99 was used to highlight the restriction on the code to AHPs and nappies. This approach has previously been adopted for other environmental permits, for similar types of sites.

The asterisk for 20 01 99 has been removed and the description for 20 03 01 has been amended to read only "mixed municipal waste". PCC require this description to be amended as 'orange bag' Dry Mixed Recyclables (DMR) will also be accepted under this code in addition to the general black bag waste and Household Waste Recycling Centre (HWRC) residual waste already accepted onto site.

Orange bag waste consists only of plastic bottles, cardboard, tins, cans, aluminum foil, empty aerosols and paper. In accordance with the Duty of Care regulations, the written description for transfers of this waste type will give as much detail as possible regarding the components of the mixed waste. Orange bag waste is considered to pose less of an environmental risk than the general black bag waste already accepted on site under this code. Therefore, no further assessment is required for the amendment of this waste code description.

## Document 7: Fire Prevention & Mitigation Plan

### 16. Section 5: Fire Prevention and Mitigation Plan Contents

You must include:	Additional Comments	SLR Response
a. the amount and type of waste received daily and how it is managed		Section 2.4 has been updated to reflect the amount of waste received daily. The types of waste received are shown in Table 2-1. The updated FP&MP is included as Enclosure 4.
b. the total amount of waste and the types and forms (e.g. unprocessed, shredded, chipped, fines or baled) that are stored on site at any one time		Section 2.4 has been updated to reflect the total amount of waste stored at any one time and the type and form all waste is stored in.
c. how each type of waste will be stored		Section 2.4 and Table 2-1 include details of how each waste type is stored. All waste is stored inside within bays, containers or skips.
d. the maximum time each type of waste will be stored on site and how it will be managed	<p>Following wastes have not been included in Table 2-1:</p> <ul style="list-style-type: none"> <li>metals</li> <li>composite packaging</li> <li>textiles</li> <li>street cleaning residues</li> <li>bulky waste</li> </ul> <p>These wastes are also missing from the site layout plans.</p>	<p>Table 2-1 has been updated to include all waste types and the bookmark links have been fixed.</p> <p>Drawing WRML-PDOCK37P has been updated to reflect all wastes stored on site and is included as Enclosure 5. The drawing number for the internal layout of Unit 41 has changed from WRML-PDOCK37N to WRML-PDOCK37P.</p>

You must include:	Additional Comments	SLR Response
	The bookmark links in Table 2-1 are broken.	
e. the location within the site where each type of waste will be stored	<p>Following wastes have not been included in Table 2-1:</p> <ul style="list-style-type: none"> <li>metals</li> <li>composite packaging</li> <li>textiles</li> <li>street cleaning residues</li> <li>bulky waste</li> </ul> <p>These wastes are also missing from the site layout plans.</p>	<p>Table 2-1 has been updated to include all waste types.</p> <p>Drawing WRML-PDOCK37P has been updated to reflect all wastes stored on site and is included as Enclosure 5.</p>
f. the maximum size any waste pile (in m <sup>3</sup> ), stipulating the maximum length, width and depth	<p>Following wastes have not been included in Table 2-1:</p> <ul style="list-style-type: none"> <li>metals</li> <li>composite packaging</li> <li>textiles</li> <li>street cleaning residues</li> <li>bulky waste</li> </ul> <p>These wastes are also missing from the site layout plans.</p>	<p>Table 2-1 has been updated to include all waste types.</p> <p>Drawing WRML-PDOCK37P has been updated to reflect all wastes stored on site and is included as Enclosure 5.</p>
g. the minimum separation (fire break) distance between waste piles or storage areas	Distances have been calculated in line with WISH guidance. This may be acceptable; however, we cannot confirm this as the separation distances have not been specified.	Drawings WRML-PDOCK37P and WRML-PDOCK34M have been updated to include the minimum separation distances between waste piles.
h. a clear area must be established around the perimeter of site, this can vary depending on the layout of your site and permitted stack sizes in accordance with the separation distances as illustrated in Table 2 (this must be available at all times and identified on your site plan)		Section 1.10 has been updated to include reference to the perimeter access around the site and vehicle access points are already included on Drawing 004.

You must include:	Additional Comments	SLR Response
i. all combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on people, critical infrastructure and the environment) and how they will be minimised.		Addition of a new Section 3.2: Managing emissions to air, land and water.
Should a fire occur you should consider:	Additional Comments	SLR Response
j. reducing the amount of firewater run-off generated - use sprays and fogs rather than jets	Unknown if considered	Section 3.5.3 has been added to show that this point has been considered.
k. recycling firewater if it's not hazardous and it's possible to reuse	Unknown if FRS has agreed to this- please provide their agreement in writing	Section 3.5.3 has been added to show that this point has been considered.  Section 3.6.2 has been updated to clarify that the FRS will recycle firewater <u>if possible</u> . There are many factors unique to each incident that would determine whether the FRS could recycle firewater. The site has sufficient access to firewater without relying on the recycling/reuse of water and therefore it is not considered necessary to gain agreement in writing from the FRS that they could reuse firewater.
To decide what options are suitable you should consider:	Additional Comments	SLR Response
l. scale and nature of the environmental hazards on site and the activities that take place on it	Unknown if considered	Section 3.5.3 has been added to show that this point has been considered.
m. risks posed to people, the environment and property	Unknown if considered	Section 3.5.3 has been added to show that this point has been considered.

You must include:	Additional Comments	SLR Response
n. type of materials you store on site, the form they're stored in and the length of time needed to extinguish a fire involving them	Unknown if considered	Section 3.5.3 has been added to show that this point has been considered.
o. availability of firewater containment facilities	Unknown if considered	Section 3.5.3 has been added to show that this point has been considered.

### 17. Section 5: Site Plan

This must show:	Additional Comments	SLR Response
a. areas of natural and unmade ground		Drawing 004 has been updated to reflect that the site is covered by either impermeable concrete surfacing or tarmac (roads and car park) and is included as Enclosure 6.
b. the location of plant, protective clothing and pollution control equipment and materials	Location of site office and pollution control equipment (drain mats and sandbags) are not shown.  Section 2.6 states "Any mobile plant not in use is temporarily stored within either of the two dedicated plant parking areas as illustrated on Drawing 004." The dedicated plant parking areas are not shown on this drawing.	The updated Drawing 004 is included as Enclosure 6.
c. the location of drain covers and any pollution control features such as drain closure valves and firewater containment systems	Surface and foul drainage shown but drains and drain covers are not.  Drainage Plan in operating techniques document is not clear and doesn't cover the whole site.	The updated Drawing 004 is included as Enclosure 6.  The drainage plan in the OT has been replaced with Drawing 004.
d. location of "off- site" emergency information pack with site plan (as specified above)		The updated Drawing 004 is included as Enclosure 6.

### 18. Section 6: Common Causes of Fires and Preventative Measures



You should consider:	Additional Comments	SLR Response
a. Visitors & contractors	Unknown if considered	Table 2-3 has been updated to include site visitors and contractors.
b. “Tramp” metal	Unknown if considered	Table 2-3 has been updated to include “Tramp metal”.
c. Batteries within waste deposits	Unknown if considered	Table 2-3 has been updated to include batteries.

### 19. Section 8 - Managing Waste Material Stacks and Separation Distances

You must include:	Additional Comments	SLR Response
a. Stack lengths and separation distances in line with <b>Graph 1</b> for general combustible wastes	Distances have been calculated in line with WISH guidance. This may be acceptable; however, we cannot confirm this as the separation distances have not been specified.	Drawings WRML-PDOCK37P and WRML-PDOCK34M have been updated to include the minimum separation distances between waste piles.
b. Stack lengths and separation distances in line with <b>Graph 2</b> for plastics and rubber wastes	Distances have been calculated in line with WISH guidance. This may be acceptable; however, we cannot confirm this as the separation distances have not been specified.	Drawings WRML-PDOCK37P and WRML-PDOCK34M have been updated to include the minimum separation distances between waste piles.
As part of your stack management you should consider these principles:	Additional Comments	SLR Response
c. manage all stacks to within the maximum sizes and minimum separation distances	No information given	Section 2.4 states the following: “Lines drawn on the inside of each bay mark the maximum height and width of each stockpile ensuring the maximum volumes are adhered to.” All material is stored in bays or containers in fixed locations assessed using the WISH guidance as opposed to loose stockpiles. Therefore, separation distances will be adhered to.

You must include:	Additional Comments	SLR Response
d. enable easy access for emergency vehicles around the whole site	No information given	Section 1.10 has been updated.

**20. Section 10: Baled Waste Storage**

You should consider:	Additional Comments	SLR Response
a. that you turn the bales to make sure the waste stays cold	Pile turning procedure mentioned, but not provided.	Section 2.5.1 has been updated to clarify that if visible 'steaming off' is observed, the stockpile will be turned using a loading shovel.  To ensure economic haulage and due to space restrictions on site, the quantity of material stored will be limited to one load and stored for a maximum of 1 week (likely to be 1 day). Therefore, routine turning of stockpiles is not required.

**21. Section 11 - Enclosing stacks using bays and walls**

You should demonstrate:	Additional Comments	SLR Response
a. full and frequent stock rotation and how this will be monitored and recorded	Pile turning procedure mentioned, but not provided.	As detailed in the response to question 20a above, the site will only store enough material for one load due to space restrictions and to ensure economic haulage therefore stock rotation will not be required.
b. how calculation of flame height and radiation has been taken into account in preventing the spread of fire between piles		Table 2 from the NRW FP&MP guidance states that a 1m freeboard left between waste and the wall height will account for flame height and prevent the spread of fire between bays. Section 2.4 of the FP&MP states that a 1m freeboard will be maintained at the top, sides and front of each bay.

You should demonstrate:	Additional Comments	SLR Response
		Separation distances have been calculated in line with the WISH guidance which considers flame height and radiation. Therefore, it is not considered necessary to conduct bespoke calculations for this site.
c. prevention of brands or lighted material moving outside the bay walls		Section 2.4 of the FP&MP states that a 1m freeboard is maintained at the top, sides and front of each bay and that separation distances have been calculated in line with the WISH guidance. These measures will prevent brands or lighted material moving outside the bay walls.
d. the frequency and method of turning piles	Pile turning procedure mentioned, but not provided.	Please see response to question 20a.

## 22. Section 12: Waste stored within a building

You should adopt the following principles:	Additional Comments	SLR Response
a. Ensure waste stack sizes and separation distances are appropriate to the risk. Table 2 can be used as a starting point but not absolute guidance for internal storage.	Distances have been calculated in line with WISH guidance. This may be acceptable; however, we cannot confirm this as the separation distances have not been specified.	Drawings WRML-PDOCK37P and WRML-PDOCK34M have been updated to include the minimum separation distances between waste piles.
b. You must ensure that all escape routes, fire exits, alarm call points and fire extinguishers are kept clear and free from waste at all times		Section 2.3 has been updated.
c. Waste storage areas should have some means of clearing smoke from the building, such as openable skylights or roller shutter doors, to aid fire-fighting.		Smoke clearance has been added to Section 3.2.1.

## 23. Section 13: Waste stored in containers

You should show:	Additional Comments	SLR Response
a. If you have a fire, you should be able to move containers as soon as is reasonably practicable in a safe manner to prevent the fire spreading. You should set out in your FPMP the procedures you will put in place to allow this to happen.		<p>The only containers on site holding more than 1,100 litres are the food waste and AHP skips. Food waste is non-combustible and therefore not subject to the requirements of the FP&amp;MP guidance.</p> <p>The AHP skip is located adjacent to a fire wall approximately 15m from the nearest waste storage area. Therefore, in the event of a fire, the AHP skip would not be moved as there is a low risk of fire spread. Moving the skip would increase the risk of a fire spreading.</p>

#### 24. Section 20: Water supplies

You must set out:	Additional Comments	SLR Response
a. You must have sufficient water supplies available to your site for firefighting to take place and to manage a worst case scenario incident (e.g. one (your largest stack) or more stacks on site are on fire).	Agree with calculations, for wastes listed within FPMP however not all wastes have been included. See above for wastes that are missing from Table 2-1 and site layout plans.	The additional wastes included within the FP&MP (Table 2-1) are either incorporated into the volumes already stated or are smaller than the largest stockpile already assessed in the table. Therefore, there has been no impact on firewater calculations as a result of including these waste types.
b. The form of the water supply- this could be water in storage tanks or lagoons on site, or access to hydrants or mains water supply. Alternative water supplies such as a near-by river, canal, lake, lagoon etc.	<p>You have given a flow rate from the hydrants. Please provide</p> <ul style="list-style-type: none"> <li>evidence that you have permission to use the water supplies stated in your plan from the respective water supplier.</li> <li>evidence of the available water pressures to your site to ensure water supplies are available</li> </ul>	<p>Written confirmation from the Milford Haven Port Authority (MHPA) regarding permission to use the fire hydrants and water from the pickling pond is included as Enclosure 7. It should be noted that under the Fire &amp; Rescue Services Act 2004, the FRS are entitled to take water from any source they deem necessary.</p> <p>Written confirmation regarding the available water pressure and the practicalities of using the salt water from the pickling pond is included as Enclosure 8.</p>

You must set out:	Additional Comments	SLR Response
	<p>without impacting on local supply, from the respective water supplier</p> <p>You have stated you will use salt water from the pickling pond:</p> <ul style="list-style-type: none"> <li>do you have permission from the owner to use this?</li> <li>Has the FRS agreed to this? As it may damage their equipment.</li> </ul> <p>Please provide their agreements in writing.</p>	

## 25. Section 19: Firefighting strategy

Specify the resources needed:	Additional Comments	SLR Response
a. heavy mobile plant you have available that can be used to move waste around the site, for example loaders, excavators, material handlers	Will this resource be available if a fire occurs out of hours? And if so, what is the time frame it would become available?	Section 3.1 has been updated to state that site operatives can attend site within 1 hour of being notified of a fire.

## 26. Section 21: Managing fire water run-off

You must:	Additional Comments	SLR Response
a. take all the steps that are reasonably practicable to minimise pollution from fire water, by providing containment of the fire water.	You have proposed to contain the water within the building using sandbags and then the external yard areas. Will the sandbags be made up and maintained at all times? Please also provide how you calculated the figures provided in section 3.5.3.	<p>Sandbags are made up and stored within Unit 35 ready for immediate use in the event of a fire.</p> <p>The figures in Section 3.5.3 were calculated based on the area of the building in m<sup>2</sup> and the height of a sandbag at 0.15m. For example, the area of Unit 41 is approximately 2,806m<sup>2</sup> multiplied by 0.15m for the height of a sandbag, which equals 421m<sup>3</sup>. The volume multiplied by 1,000 gives the capacity in litres.</p>

You must:	Additional Comments	SLR Response
	<p>You have also stated that 50% of the fire water will evaporate. Please provide evidence for this statement. Please note you will still have to show how you will contain ALL of the water used to fight a fire.</p> <p>Section 3.5.1 provides information with regards to the site drainage and discharge points. Please see the above queries in the risk assessment section for the clarification needed on site drainage.</p>	<p>The paragraph relating to 50% evaporation has been removed. The predicted amount of firewater can be contained within each building. The evaporation allowance was to provide further confidence that all firewater can be contained.</p> <p>The site drainage has been confirmed in response to question 2 above.</p>
<p>b. If you are able to divert fire water to your local sewers. You will need agreement in principle from the sewerage company before including this measure in your fire prevention plan (evidence of approval will need to be submitted in the plan)</p>	<p>For this to be considered as a viable option we need written agreement from the sewerage undertaker.</p> <p>As the quarantine area is outside, you also need to show how you will prevent fire water from external areas entering the environment.</p>	<p>The option to discharge to sewer has been removed from the FP&amp;MP. Section 3.6.3 has been updated to reflect that PCC will use their own fleet of tankers to remove firewater from site and dispose of it at a suitably licensed facility.</p> <p>The use of the quarantine area has been amended in Section 3.8.1 to confirm that it will be used to separate unburnt waste in the event of a fire and will not be used to douse burning waste. Therefore, firewater containment measures outside are not required as all firewater will be contained within the building.</p>

## 27. Section 23: During and after an incident

You should consider:	Additional Comments	SLR Response
<p>a. diverting incoming wastes to alternative sites during a fire</p>	<p>Statement that waste will be diverted if site is damaged in a fire, but no information provided for diversions <i>during</i> a fire.</p>	<p>Section 3.7 has been updated to reflect the procedure for diverting waste during a fire.</p>

You should consider:	Additional Comments	SLR Response
b. having a plan for how you will notify those who may be affected by a fire, such as nearby residents and businesses	No information provided	Section 3.4 contains the emergency contact procedure and Appendix 01 contains the emergency contact sheet. Section 3.4 has been updated to confirm that PCC will communicate the details of the fire on their website and social media channels.
c. contractors that might be used to assist with additional plant for firefighting techniques, removal of waste material, containment and removal of excess water run-off	No information provided	Section 3.6.3 has been updated to included details of additional incident response contractors and Appendix 01 updated to include their contact details.
d. how you will clear and decontaminate the site	No information provided	Section 3.8 has been updated.

## Document 10: Odour Management Plan

**28.** Section 2.1 refers to AHP skips. Please specify if these are enclosed and where these will be located. They are not shown on Document 11 WRML- PDOCK34F Unit 29 & 29A Layout.

### SLR Response

Section 2.1 has been updated to reflect that the skip is sealed at the bottom and sides. Drawing WRML-PDOCK34M illustrates the location of the skip. The revised Odour Management Plan (OMP) is included as Enclosure 9.

**29.** Section 2.1 states that biodegradable food waste will be stored in containers that are sealed at the bottom and sides, and that outgoing loads will be sheeted. The Operating Techniques document section 3 states that this waste will be stored in sealed arctic containers. Please confirm if the containers are open at the top or sealed.

### SLR Response

The OT has been updated to reflect that the skips are sealed at the bottom and sides but open at the top.

**30.** Section 2.2 states treatment is baling only. Other documents in the application state treatments are baling and bulking up or sorting, baling and bulking up. Please clarify what treatments you wish to be included in the permit.

## SLR Response

Please see the response to Question 10 above.

- 31.** *Table 2-1. Waste 20 03 01 has an asterisk; what does this mean? In the context of an EWC this means hazardous waste. Please clarify.*

## SLR Response

Please see the response to Question 15 above.

- 32.** *Table 2-2 does not consider the odour potential of the biodegradable kitchen and canteen waste or the Absorbent Hygiene Products (AHPs). Please identify all potential odour sources.*

## SLR Response

Table 2-2 has been updated to include biodegradable kitchen and canteen waste and AHPs.

- 33.** *Table 2-2 refers to the wrapping of waste. This is not a proposed treatment under this variation; this wording needs to be amended, and risks reassessed.*

## SLR Response

Table 2-2 has been amended to remove reference to the wrapping of waste. The risks have been reassessed and it has been concluded that there will be no change to the odour potential of wastes stored and treated on site as a result of removing the reference to wrapping.

- 34.** *Table 2-2 contains a contradiction. You have stated that bulky waste contains high levels of putrescible waste but gives the odour potential is very low. Bulky waste could include fridges collected from householders which could contain rotting food waste. Please amend this wording and reassess the risks.*

## SLR Response

Table 2-2 has been updated to reclassify bulky waste as a medium risk (highly odorous but controls mitigate this). A cautious approach has been taken to classify bulky waste as potentially highly odorous (i.e. as indicated this could include significant quantities of rotting food) however the risk is decreased to medium due to the mitigation measures in place, specifically the waste reception controls. There are no further changes needed in response to this change, as the highest mitigated odour potential on site is still medium.

- 35.** *Section 3.1 refers to offending feedstock being segregated and isolated from other wastes. Where is this quarantine area located? What form does it take? Is it a sealed skip, corner of a building etc.?*

## SLR Response



Section 3.1 has been updated to reflect that offending feedstock will be stored in a 1,100litre residual waste bin and removed offsite as soon as a suitably licensed facility can be identified (ideally within 1 day). The location of the residual waste bin is mobile, so a set location has not been identified.

- 36.** *Section 3.1 states “The majority of odorous waste (i.e. black/orange bag waste) is stored at the units (29 and 29A) furthest from sensitive receptors, notably the hospital located south of the Site;”. Why are the industrial units bordering the site not considered sensitive receptors?*

### SLR Response

Sections 2.8 and 3.1 have been reworded to reflect that ‘the majority of odorous waste is stored at the units (29 and 29A), furthest from the most sensitive receptor’. The nearby industrial units are classified as ‘sensitive receptors’ but with a low sensitivity. The nearby hospital is classified as a highly sensitive receptor. The classification applied is defined in the IAQM odour guidance and is widely accepted. It is primarily based around the time of residence associated with the receptor, therefore residential properties would rank higher than a workplace. Hospitals are particularly sensitive as people can be in one place for an extended period and being ill can make them more aware of stimulus such as odour. It is best practice to store the most odorous waste away from the highly sensitive nearby receptors (as per the current approach).

- 37.** *Section 3.2 refers to a quarantine area. Where is this located?*

### SLR Response

Section 3.2 has been updated to reflect the procedure for handling non-conforming waste.

- 38.** *Section 5.2 states “Where unacceptable odour exposure is traced back to a particular waste received, acceptance of further consignments of this waste category from that particular waste producer will be addressed with further investigations and identification of a solution.” Given that the waste producer for most of the wastes in the permit are householders, how do you envisage this working?*

### SLR Response

This sentence has been removed from the OMP. In practice, collection crews or HWRC operatives could identify a significantly odorous source of material particularly when collecting from commercial premises but they are unlikely to be able to investigate the actual source due to the number of different waste sources e.g. multiple offices in a building all collecting waste in the same receptacle.

## **Document 11: WRML-PDOCK34F Unit 29 & 29A Layout**

## **Document 11 WRML-PDOCK37N Unit 41 Layout**

- 39.** *Please provide amended unit layout plans that show where all waste listed within your application (existing and proposed wastes) are to be stored, as the following wastes have not been included:*

- 15 01 05 composite packaging
- 15 01 06 mixed packaging
- 16 02 14 discarded equipment other than those mentioned in 16 02 09 to 16 02 13
- 16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15
- 16 06 04 alkaline batteries (except 16 06 03)
- 16 06 05 other batteries and accumulators
- 19 12 08 textiles
- 19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
- 20 01 10 clothes
- 20 01 11 textiles
- 20 01 34 batteries and accumulators other than those mentioned in 20 01 33
- 20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
- 20 03 03 street-cleaning residues
- 20 03 07 bulky waste

### SLR Response

The revised drawings for the internal layout of Units 41 and 29/29A have been included as Enclosures 5 (WMRL – PDOCK37P) and 3 (WMRL – PDOCK34M). 19 12 12 has been removed from the waste list as no wastes falling under this waste code will be accepted on site.

## **Pest Management Plan**

**40.** *Please either provide an updated Pest Management Plan, which includes all proposed permitted wastes. A Pest Management Plan was not submitted with this application, although sections of the Operating Techniques and Risk Assessment address pest issues. Given the previous issues with pests (i.e. flies), and that the food waste, AHP and black bag waste all have the potential to attract pests a PMP is required.*

### SLR Response

The revised Pest Management Plan is included as Enclosure 10.

Yours sincerely  
**SLR Consulting Limited**



**Heather Kerr**  
Senior Consultant – Environment Management, Permitting and Compliance

CC  
Debbie Palfrey – WRAP Cymru  
Sarah Edwards – Pembrokeshire County Council

Enc  
Enclosure 1 – Revised Environmental Risk Assessment  
Enclosure 2 – Revised Operating Techniques  
Enclosure 3 – Updated Drawing WRML-PDOCK34M  
Enclosure 4 – Revised Fire Prevention & Mitigation Plan  
Enclosure 5 – Updated Drawing WRML-PDOCK37P  
Enclosure 6 – Updated Drawing 004  
Enclosure 7 – Permission from MHPA  
Enclosure 8 – Flow rate and Salt Water  
Enclosure 9 – Revised Odour Management Plan  
Enclosure 10 – Revised Pest Management Plan