

Company Secretary  
The Treatment Hub Limited  
Brook House  
Moss Grove  
Kingswinford  
West Midlands  
DY6 9HS

**Our ref: PAN-009143**  
**Your ref:**

**Date: 5 August 2020**

Dear Sir/Madam,

**We need more information about your application**

**Application reference:** EPR/ZP3933NJ

**Applicant:** The Treatment Hub Limited

**Facility:** The Treatment Hub, Building 2, Westfield Industrial Park, Swansea, SA5 4SF

Further to the Application documents received on 12 February 2020, unfortunately I need to ask you for some more details before I can decide whether it's duly made or not.

Please would you provide us with more information as detailed below:

- 1 Regarding the OPRA profile submitted please provide documentation to support your answers provided to the following operational performance measures:  
**Competency & Training:**
  - 2c. Reporting procedures to inform supervisors or managers of deviations from permit conditions;
  - 2d. procedures to be used by supervisors or managers and for the reporting of deviations from permit conditions to the Agency; and
  4. Do the key posts include contractors, those responsible for liaising with contractors and those purchasing equipment and materials?.
  5. Do you assess the potential environmental risks posed by the work of contractors and provide instructions to contractors about protecting the environment while working on site?**Emergency Planning:**
  2. Has the (Accident Management) plan identified areas where improvement is needed?

6. Are there written procedures for investigating incidents, (and near-misses) including identifying suitable corrective action and following up implementation of that action?

8. Are there audit records of investigations into non-compliance, complaints and incidents? Does the audit cover follow up actions? Do the audit reports go to senior managers?

**Organisation:**

2.2 Are there procedures that incorporate environmental issues into the following areas (as supported by demonstrable evidence e.g. written procedures):

- o the control of process change on the installation;
- o design and review of new facilities (including provision for their decommissioning), engineering and other capital projects;
- o capital approval;
- o purchasing policy;

2.4 Are they independent? (name the auditing body)

2.5 Are there reports annually on environmental performance, objectives and targets, future planned improvements and or facilitate (participate in) local community liaison meetings?

- 2 Please revise and re-submit the non technical summary. This revised document needs to explain the changes that are proposed and not the how the site will be following the proposed changes as it does at present.
- 3 Please explain, including technical detail, how the proposed treatment will work effectively, and produce the stated intended results, if the wastes are stored and treated together in one stockpile.
- 4 Please explain, including technical detail, how the treatment processes will work and produce the stated intended results, for each waste type to be received and for each waste type to be used to benefit the process (In Table 2 of the permit variation supporting document, you list waste streams to be beneficial to the treatment process). This should have reference to the full details of the nature of the beneficial waste and to the full range of classifications that will be applied to the material to be removed from the site at the end of the process.

Please reply within 25 working days from the date of this letter. If we don't hear from you we may return your application. Alternatively you may wish to withdraw the application and request return of the application fee.

If you email or write to us please quote the application reference on any correspondence and send it to the relevant address.

When we receive the requested information, we will continue to check the details in your application. If there's enough 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.

If you have any questions please contact me.

Yours sincerely



Paul Williams  
Senior Officer, Installations and RSR Permitting

Epost/Email [paul.c.williams@cyfoethnaturiolcymru.gov.uk](mailto:paul.c.williams@cyfoethnaturiolcymru.gov.uk)  
[paul.c.williams@naturalresourceswales.gov.uk](mailto:paul.c.williams@naturalresourceswales.gov.uk)