

Ian Burton

From: Ian Burton
Sent: 18 June 2026 11:49
To: 'Clee, Owen'
Cc: Dr Samuel Hall
Subject: RE: PAN-032953 Return of mobile plant deployment application
Attachments: 25914 SK04 180626 WM3 Determinations.pdf

Dear Owen,

Thank you for your email of 16 June reference '*PAN-032953 Return of mobile plant deployment application*'.

Based on your correspondence, we shall deploy the SR2008no27 as a 'whole activity'. This considers your comments of 16 June and also in letter '*PAN-031959 & PAN-031960 Return of mobile plant deployment applications*' (referencing the original submission of the SR2008no27 permit). We would politely request that you prioritise the re-application, as works will be commencing on site mid-July.

We have reviewed all available data, and taking into account the Hazardous Waste Online certificates produced by Tier Consultant Group (Ref: *Ground Investigation for Deeside, Shotton TE1920-TE-00-XX-RP-GE-002-V08 20 January 2026*), JFHR consider that all 'soils' across the site shall need to be considered as 'Hazardous by WM3'.

The attached drawing, *25914/SK04/180626 WM3 Determinations*, indicates the spread of 'hazardous' determinations. Proximity of 'non-hazardous' determinations to 'hazardous' determinations would mean that it would be extremely difficult to target these areas, and in targeting these areas there would be no guarantee that the remaining segregated material would be 'non-hazardous'. This is a function of the fact the samples have been assessed as 'hazardous' under WM3 due to the presence of steel slag.

As previously described, all materials (except those covered by *Tier Consultant Group – Interim Remedial Options Appraisal, Remediation Strategy and Verification Plan for Deeside, Shotton TE1920-TE-00-XX-RP-GE-008-V05 20 January 2026*) are suitable for reuse. As such the most appropriate method to undertake the activity is bulk dig, processing as required to generate a suitable geotechnical material and placement. We appreciate that this approach to remediation will be quite different to most SR2008no27 or SR2022No2 deployment applications that require to be assessed.

Non-haz concrete / brick arisings shall be processed to a geotechnical standard by principally the same plant as the 'soils' but at a different time. During the site activities - any stockpiling of pre-processed broken out concrete / brick shall be kept separate from the 'soils'.

With reference to the original SR2008no27 application return, and indeed the revised application, we would be grateful if the review does not include review of drawings in Tier Consultant Group documents. The 'site' shown in *Interim remedial options appraisal, remediation strategy and verification plan for deeside, shotton TE1920-TE-00-xx-RP-GE-008-v04 09 December 2025 FINAL*, prepared by Tier, includes access roadways which are not part of the JFHR operational site.

The site plan shall make very clear, the type and location of mobile plant used, process, treatment, storage, and quarantine areas and sizes, including the segregation of non-haz concrete / brick from hazardous soils. Additional information on the drainage system shall be included. However, with regards to proposed drainage system, it is essential that it is recognised that all materials are suitable for use chemically and therefore it has been determined that there is no risk to underlying surfaces. We recognise again that this is different from regular treatment operations that require to be assessed.

The treatment plant for this remediation activity is dissimilar to traditional remediation techniques – no ‘contaminants’ are being ‘treated’. The ‘treatment’ operation shall generate geotechnically suitable materials, with recovery according with DoWCoP.

Due to this deployment being slightly different from regular SR2008no27 and SR2002no2 activities, which can be more readily comprehended and more amenable to assessment, we would very much appreciate a discussion, perhaps by Teams, or via ‘Requests for Further Information / Clarifications’ emails during the review stage if they are required, in order to avoid potential rejection of this application at this stage.

Kind regards,

From: Clee, Owen <owen.clee@cyfoethnaturiolcymru.gov.uk>

Sent: 16 June 2026 09:04

To: Ian Burton <Ian.Burton@johnfhunt.co.uk>

Subject: PAN-032953 Return of mobile plant deployment application

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Deployment ref: PAN-032953

Permit reference: EPR/EB3403UE

Permit holder: John F Hunt Regeneration Ltd.

**Location of the deployment: Shotton Steel Works, Zone 4 Deeside Industrial Park,
Weighbridge Road, Deeside, CH5 2NH**

Dear Dr Burton,

Thank you for your deployment application received on 22/05/2026. Unfortunately, we must return the deployment application. Find below the reason why we must return your application.

Return Reason

Hazardous waste classification

From reviewing the document (doc ref: Narrative Logs and CSM) in regard to the evidence provided on why waste under this deployment are non-hazardous we do not agree with the conclusion you have given on why the wastes should be treated as non-hazardous.

The Haz Waste Online report provided has clearly identified waste samples as EWC 17 05 03* for containing metal oxides and chromates at hazardous concentrations. While you have provided narrative on why this should not be the case; NRW have determined this is not evidence proving

the wastes to be treated will be non-hazardous. We have come to this conclusions by considering the following:

- WM3 is clear in defining and describing both EWC 17 05 03* and 17 05 04 based on mirror entries based on hazardous properties.
- While EWC 10 02 01 & 10 02 02 are defined as AN wastes it's important to view this in context to WM3 which defines each waste code as source segregated wastes from source. This would not include from contamination and in this instance metal and chromates at hazardous concentrations being mixed within soil and stones. Natural Resources Wales considers the justification given in the narrative log is not supported by WM3. Waste classification must be based on the composition of the waste as presented, and the presence of hazardous substances within the soil matrix has been demonstrated through testing.

Natural Resources Wales conclude there are areas where the soils and stones are contaminated and EWC 17 05 03* is the correctly identified waste code as the Haz Waste Online report has highlighted. While coding the waste as 17 05 04 is incorrect due to the hazardous concentrations of metal oxides and chromates in the soil and stones and not segregated.

Due to this, you will be unable to deploy under SR2022 No 2 as the permit does not permit the handling or treatment of hazardous waste.

If you wish to deploy for this activity we would advise you to deploy under SR2008 No27 (a land remediation deployment) **as one whole activity**. This will allow you to handle hazardous waste as SR2022 No 2 does not permit this. Under SR2008 no27 you will be able to handle and treat both hazardous and non-hazardous waste. But please note you will need to demonstrate in a resubmitted deployment application how you will separate handling and treating of hazardous and non-hazardous wastes to avoid contamination from waste treatment and storage from the deployment activity. This needs to include how hazardous and non-hazardous wastes will be segregated, handling controls for each and volumes for each.

If you decide to do this please note you will need to provide the amount of waste you propose to treat as this is a requirement for deployments under SR2008 No27 as the permit itself does not include a volume limit and must be assessed and agreed by NRW via a deployment application.

Other issues identified within your application

Site plan

The site plan SK02/Site Environmental Plan has displayed the general area to which wastes will be '*processed*' but for a deployment application we require the site plan to show the specific location of mobile plant used for the deployment activity as well as the specific storage areas of the deployment. Please note as this activity would include the treatment and/or handling of both non-hazardous and hazardous waste any resubmitted deployment application under SR2008 No27 (a land remediation deployment) will need to demonstrate how areas of the activity are separating out the handling and treatment of both non-hazardous and hazardous waste.

Your deployment application fee covers our assessment costs. Our decision to return this application follows a complete technical assessment of your application, including all supporting information. However, we noticed you paid £1,464 from the previous charging scheme 2025/26. Please note the charging scheme 2026/27 which became effective on 01/04/26 highlights the fee

for a soil treatment deployment is £1,404. As a result, NRW will refund you the difference to the sum of £60.

For NRW to process this refund we require you to do the following:

1. Email Banking.Team@naturalresourceswales.gov.uk with your bank details. The MUST be the same details as originally made the payment and should include: the PAYEE name, PAYEE address, Sort Code, and Account Number.
2. Where the applicant is a company, and you are not using an email address that is clearly consistent with the company name (with email signature) you must provide these details on company letter headed paper.

NOTE: If you decide to reapply, we will endeavour to prioritize any resubmitted application from our work queue considering the previous attempts made in submitting the deployment activity. Please note this prioritization is limited to individual permitting officers' workloads so may not be allocated immediately.

If you are not satisfied with the service, you have been provided by myself or any other area of NRW then we would respectfully direct you to our complaints procedure. [Natural Resources Wales / How to make a complaint](#)

If you have any queries about this matter please contact us by telephone on 0300 065 3000 or email us at enquiries@naturalresourceswales.gov.uk quoting your deployment application reference.

Kind regards,

Enw / Owen Clee

Teitl swydd / Waste Permitting Officer 2

Adran Cyfarwyddiaeth Strategaeth, Polisi a Thystiolaeth / Strategy, Policy and Evidence Directorate

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay



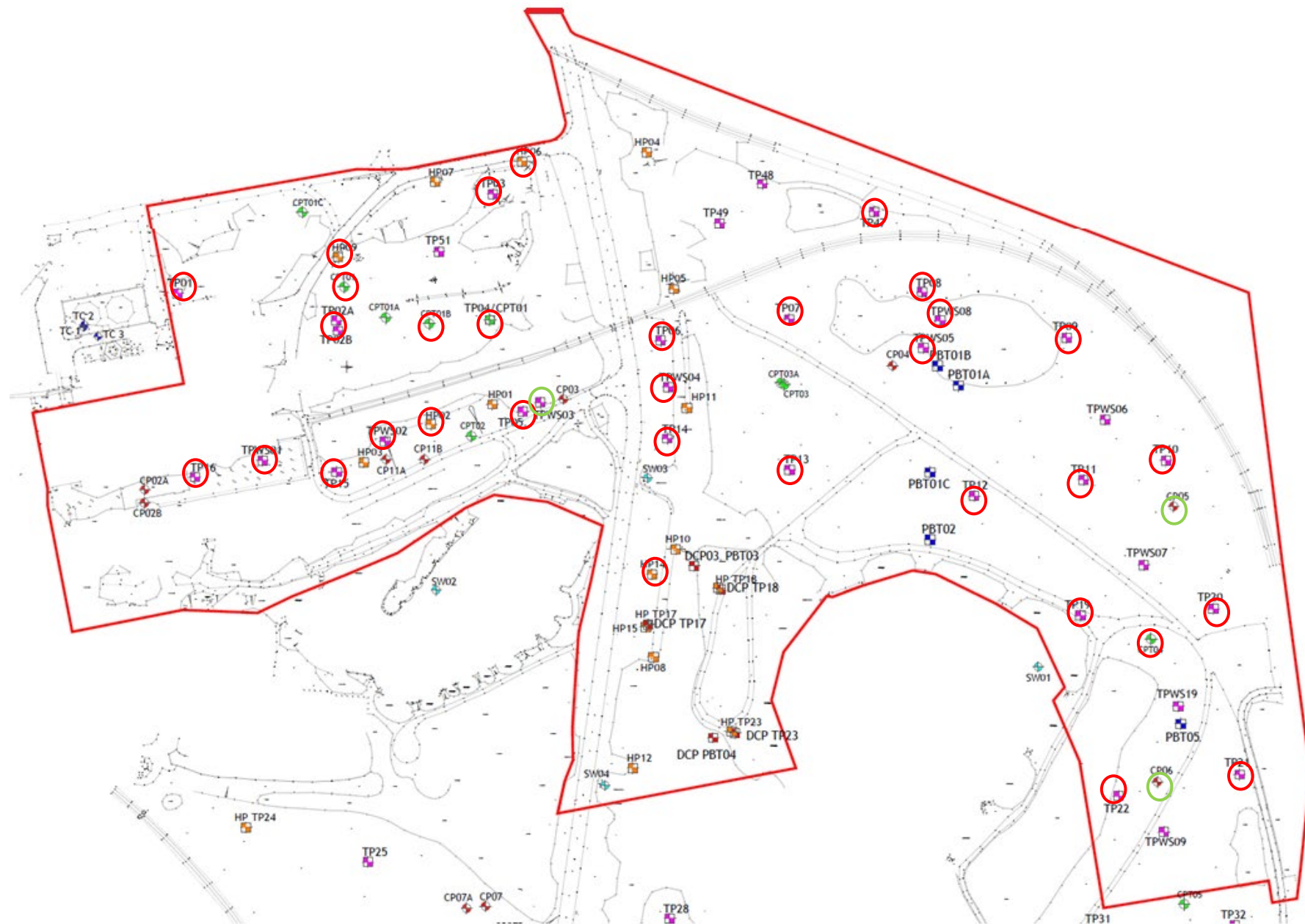
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○ 'Hazardous' based on Tier Consulting's Application of WM3 by input into HazWasteOnline (TE1920-TE-00-XX-RP-GE-002-V08)

○ 'Non-Hazardous' based on Tier Consulting's Application of WM3 by input into HazWasteOnline (TE1920-TE-00-XX-RP-GE-002-V08)