

Mr. Philip Rees
12 Morawel
Winch Wen
Swansea
SA1 7LN

**Our ref: PAN-006978
Your ref: TTH/SSF/08-19**

Date: 26 November 2019

Dear Mr. Rees,

Returning your permitting application

**Application reference: PAN-006978
Operator: The Treatment Hub Ltd
Facility: The Treatment Hub Swansea**

Thank you for your application received on 13 September 2019. Unfortunately, we have not been able to complete our duty making checks as insufficient information has been submitted and we must return your application to you.

The reasons for our decision are provided below. You may resubmit your application providing all the points below are addressed and the missing information is provided. We recommend that you talk to your local area office about your application before you re-submit. Please call 0300 065 3000 and ask to speak to your local area office or your site officer.

Reasons for returning your permit application.

1. Unfortunately, the declaration within section 7 of Part F1 of the application form is not complete and we have been unable to validate this application. Please make sure a relevant person completes this section of the form in any future application submissions. Relevant people means each applicant, and in the case of a company, a director, manager, company secretary or any similar officer or employee authorised to sign on behalf of the company. If you wish to sign the declaration on behalf of the applicant, you must include confirmation that you have been authorised to do so.
2. It is not clear which Schedule 1 listed activity / activities you wish to apply for. Table 1a within Part B3 of the application form references:
 - Part A(1) 5.4c(iii). This does not correlate to any activity listed within the Environmental Permitting (England and Wales) Regulations 2016.

Furthermore, the Opra Profile submitted references a non-hazardous activity:

- 5.4 Part A (1)(a)(i) - Part A(1) (a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment(a)

Ebost/Email Lucinda.hall@cyfoethnaturiolcymru.gov.uk
 Lucinda.hall@naturalresourceswales.gov.uk

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd.
CF24 0TP
Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24
0TP

(i) biological treatment;

Your application must clearly state which activities you wish to apply for, along with an Opra Profile listing all proposed activities. Table 1a within Part B3 application form must list the same activities at those referenced within the Opra Profile;

3. There is no evidence that your application fee has been paid. It should be noted that should you wish to re-apply, the application fee may change depending on the number of listed activities you request to be included within the permit application;
4. You have not provided a sufficiently detailed process description. This process description must describe in detail how you intend to accept each waste type requested, and how these will be received, stored and processed on site. Additional justification must also be provided on why you wish to accept 99 EWC codes, and how any non-compatible hazardous waste types will be suitably stored and segregated on site;
5. For all new bespoke permit installation activities, applicants will need to comply with Best Available Techniques (BAT) from the outset. Once you have confirmed which Schedule 1 listed activity / activities you wish to apply for, a BAT assessment must be completed and submitted as part of the supporting information, in reference to the revised Best Available Techniques Reference Document (BREF) for Waste Treatment. <https://eippcb.jrc.ec.europa.eu/reference/wt.html>
For each BAT conclusion and its individual sub-elements contained within the BAT conclusions document, you will need to:

- Confirm whether or not your proposed activities will comply with the requirements of the BAT Conclusion, including any associated emission levels, providing a description of the techniques in place and how they meet the standard;
 - If your activity will not comply with the BAT conclusion, you should provide a full description of alternative measures to be adopted that will provide equivalent environmental protection;
 - Where your proposed activity involves the use, production or release of relevant hazardous substances (as defined in Article 3(18) of the Industrial Emissions Directive) you will also need to carry out a risk assessment considering the possibility of soil and groundwater contamination at the proposed installation with these substances. Where any risk of such contamination is established, submit an updated baseline report containing information necessary to determine the current state of soil and groundwater contamination.
- Given the nature of the proposed activities, we would (as a minimum) expect a Dust Management Plan to be submitted along with details within your supporting documentation on the management techniques proposed to manage all fugitive emissions generated from your proposed activities. Your environmental risk assessment will need to be updated to also clearly identify all nearby human sensitive receptors.
 - A site drainage plan and further details of how you propose to manage potential contaminated run-off from the site must be provided;
 - The site boundary plan submitted contains insufficient detail. Site plans must be in accordance with EPR Part B2 Guidance standards. As a minimum the site plan should provide a date, a reference and must be drawn accurately to a defined scale. The outline of the site must be clearly marked in green. Local features should be on the plan to help us place the site in its local environment. The site boundary plan submitted does not clearly identify the site boundary in relation to existing infrastructure or features.
 - The application does not contain sufficient detail on how you intend to monitor the process. A monitoring plan must accompany any future re-submission.
 - The Site Condition Report submitted makes reference to historical intrusive site investigations which establish baseline conditions for the site. You should submit all relevant reference documentation in support of your application site condition report as part of any re-submission.

If you operate a regulated facility without a permit, you would be committing an offence and would be liable to prosecution.

If you have any questions, please contact me at lucinda.hall@naturalresourceswales.gov.uk.

Yours sincerely

Lucinda Hall MCIWM BSc (Hons)

Trwyddedu Uwch, Gosodiadau a Thrwyddedu RSR /

Permitting Consultant Installations and RSR Permitting Team

Cyfoeth Naturiol Cymru / Natural Resources Wales

Ty Cambria Caerdydd / Ty Cambria House, Cardiff

Gwefan / Website:

www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk