

Mr Gwyn Roberts  
St James House  
Knoll Road  
Camberley  
GU15 3XW

**Our ref:** PAN-008013

**Date:** 11/12/2019

Dear Mr Roberts

**Returning your permitting application**

**Application reference:** PAN-008013

**Operator:** Bam Nuttall

**Facility:** Llanwern Rail Facilities

Thank you for your application submitted on the 20/11/2019. Unfortunately a lot of information that is required to move onto determining the permit is missing and this means your application is 'not duly made' and we must return it to you.

We require the following corrections/additional information to be submitted with any application in the future:

- You have applied as an 'Organisation of individuals' in Application form 'Part A'. Bam Nuttall is a registered company and we require the correct information to be supplied to reflect this. The declaration in application form F2 must also be signed by a person of significant control (i.e. a named contact on companies house), or a letter authorising you to act on behalf of the company, also signed by a person with significant control, must be submitted with the application
- In application form B2 you have completed 'Appendix 1 – Low impact installation checklist', this is not applicable to a standalone Water Discharge Activity
- You have stated in application form B6 part 2b that the discharge is not time limited. Given that the activity applied for is related to construction activities I would expect it to be time limited. Please can you re-evaluate this when resubmitting the application
- In application form B6 parts 4b and 4c, the values given are calculated from the average rainfall. We set permit limits based on maximum possible discharge volumes, therefore please can the calculations be amended to demonstrate the maximum daily discharge volume and rate
- In application form B6 you have applied for multiple activities. Firstly you have applied for a discharge onto land (Water Management Option A), secondly you have applied for a discharge to surface water (Water Management Options B and C). If you wish to apply for separate discharge activities you must submit 2 applications and pay fees for each

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[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English

- In application form B6 part 6b, you have speculated as to what treatment will be on site. In order to determine a permit correctly we must know what treatment will definitely be present. If you wish to change treatment/activities you may vary any permit if one is granted
- You must clearly give a discharge NGR and effluent monitoring NGR and outline these on the given site map for the chosen discharge activity. The
- The appropriate risk assessments have not been completed and submitted with the application. For a discharge of trade effluent to ground we expect a risk assessment to be completed in line with the standard H1 methodology, as outlined [here](#). Further, more specific guidance on groundwater risk assessments can also be found [here](#). The sampling report 'W29\_0866 Full Report\_V1\_1' also shows that [hazardous substances](#) are present (endrin for example). We require comprehensive evidence submitted in your risk assessment as to how you will prevent a discharge of hazardous substances to ground to ensure you comply with the 'prevent' requirement of the Environmental Permitting Regulations.
- The sampling results from 'W29\_0866 Full Report\_V1\_1' also show hazardous substances for surface water (Naphthalene for example). If you wish to pursue a discharge to surface water you must submit a risk assessment in line with the H1 methodology ['Surface water pollution risk assessment for your environmental permit'](#)

You may resubmit your application. We recommend that you talk to your local area office about your application before you complete it. Please call 0300 065 3000 and ask to speak to your local area office or your site officer.

We'll refund your fee separately.

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 phone me on 0300 065 4884 or email [Elliot.Burge@naturalresourceswales.gov.uk](mailto:Elliot.Burge@naturalresourceswales.gov.uk).

Yours sincerely

Elliot Burge  
Water Quality Permitting Officer