

The Company Secretary  
Welsh Water Organic Energy Limited  
Dwr Cymru Welsh Water  
Pentwyn Road  
Nelson  
Treharris  
CF46 6LY

**Our ref: EPR/AB3096CP**

**Date: 19/12/2019**

Dear Sir/Madam

**Environmental Permitting (England and Wales) Regulations 2016 Permit Review  
Request for information**

**Permit reference: EPR/AB3096CP**  
**Operator: Welsh Water Organic Energy (Cardiff) Limited**  
**Facility: Lamby Way Open Windrow Composting Facility, Lamby Way,  
Rumney, Cardiff, CF3 2EH**

In April 2019 we wrote to you advising of Natural Resources Wales statutory requirement to review your permit, following the publication of the revised Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment. Our letter and accompanying Notice set out the information we required from you in order to be able to carry out that review.

On 27 September 2019 we received a response from you to the above request. This response did not provide sufficient information to items 1 to 6 of the Reg 61 Notice and Natural Resources Wales are unable to determine whether you comply with the Notice. You must confirm whether or not you currently comply with the regulations against each BAT Conclusion; provide an adequate description of the techniques in place and how they meet each standard; or describe how and by when you intend to comply with each BAT Conclusion. Where you believe a BAT Conclusion is not applicable to your site you must state why and provide this within your response. Failure to comply with this notice without reasonable excuse is an offence under Regulation 38(4)(a) of the Environmental Permitting (England and Wales) Regulations 2016. If we do not receive sufficient additional information within the timeframe specified below, NRW will proceed to issue an updated IED permit with appropriate conditions in place, based on the limited information available to us. Please note this may result in stricter permit conditions and emission limits than may be necessary.

The original information notice issued under Regulation 61(1) of The Environmental Permitting (England and Wales) Regulations 2016 is enclosed for your information.

In your response you have stated that an internal assessment against each BAT Conclusion has been undertaken. We require you to submit a copy of the full assessment, ensuring that it clearly lists each individual BAT Conclusion, and states whether or not you currently comply with the requirements of each BAT Conclusion, including any associated emission levels. A description of the techniques in place should be provided along with details of how they meet the standards. The response should also include details on how you intend to meet the standards before the 17<sup>th</sup> August 2022.

You have not provided a copy of the current Opra Profile.

In addition, where you use, produce or release hazardous substances, as defined in Article 3(18) of the Industrial Emissions Directive, you will need to complete a risk assessment considering the possibility of soil and groundwater contamination at the installation with such substances. Where any risk of such contamination is established, you will need to take the action specified in the Notice. Insufficient information has been provided.

Where the information specified in the Notice has been previously submitted to and accepted by Natural Resources Wales, and where this remains current and valid, then it will not need to be submitted again. However, you will need to state this in your submission, specifying the nature of the information and the date it was submitted.

The requirements of the Reg 61 Notice dated the 4th April 2019 have not been fulfilled, please provide all outstanding information within 4 weeks of the date of this letter (16/01/2020). If for any reason the missing information cannot be provided within this timeframe please contact Lucinda Hall via email: [lucinda.hall@cyfoethnaturiolcymru.gov.uk](mailto:lucinda.hall@cyfoethnaturiolcymru.gov.uk) or speak to your regulatory officer.

Yours faithfully,



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

cc: David Holthofer [Dave.Holthofer@dwrcymru.com](mailto:Dave.Holthofer@dwrcymru.com) (by email)