



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Dr. Ahlim Hashm
Technical Director
Neals Soils Supplies
Atlantic Eco Park,
Newton Road,
Rumney,
Cardiff, CF3 2EJ

Our ref: NRW/SC/EPR-VP3095FS

Date: 17th January 2020

Dear Dr. Hashm,

**NEAL SOILS SUPPLIERS LIMITED: AN APPLICATION for A TRIAL TO WASH
IBA**

Thank for your letter of 18th December regarding the above proposed activity at the permitted site EPR/VP3095FS.

I am aware of your enquiry to carry out a trial as described under table S2.2.B of the above permit. As has been explained by Officer Kemp, NRW does not feel that the proposed activity falls within the criteria specified under our trial criteria. Any decisions regarding trials, and the applicability of our current stance on trials, is taken by our sector subgroup, of which our operational team are consultees.

You highlight in your letter the specific criteria of the trial needing to be new and innovative to be considered and, in this circumstance, we do not believe that the activity is innovative. Importantly however, this does not prevent you from pursuing permission to carry out the activity under your permit, as opposed to without a permit being in place.

In response to your specific queries raised in the letter, I can confirm that we would consider the application to vary the permit to allow this activity (namely the washing of IBA through your existing systems) to be a minor technical variation.

This is based on the following information:

- Treatment techniques / methodologies on site **remain unchanged** – i.e. existing techniques will be used to process the two new waste types and there's no need for NRW to assess new procedures other than waste acceptance specific to EWCs;
- New waste types are **similar in nature to existing wastes types** and introduce no additional risk – i.e. no complex AQ or noise modelling required etc;
- **Annual throughput for site will not increase;**

Natural Resources Wales, Rivers House, St Mellons, Cardiff, CF3 0EY
Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Ar 1 Ebrill 2013, unodd Cyngor Cefn Gwlad Cymru, Asiantaeth yr Anghylchedd Cymru a Chomisiwn Coedwigaeth Cymru gan greu un corff, sef Cyfoeth Naturiol Cymru.

As of 1 April 2013, the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales became Natural Resources Wales/Cyfoeth Naturiol Cymru.

- **Site boundary will not increase;**
- **No other changes required** (such as changes to site drainage / layout / storage area distances to sensitive receptors, etc);
- **No changes required to site management plans or mitigation procedures.** I.e. Existing documents will not require submission as part of variation & therefore we do not need to charge for review (AMP / FPP / NMP / OMP) * Main concern here is risk of flammability of unprocessed IBA / explosion due to hydrogen gas build-up etc – and if plans already cover this risk sufficiently.

At this point we should raise that our statutory determination period for this type of work is 3 months. However we are considering carrying out this variation determination at the same time as we are considering the waste Treatment BREF review also due on your permit.. This should, we hope, help to minimise any further delays and allow the matter to be progressed whilst the permit is already under review. This is dependent on an application being submitted without delay, and that application being of sufficient standard to allow it to be duly made. Officer Kemp is to contact you promptly to facilitate any advice you may require from this stand point.

Finally, I would again personally apologise for any time delay experienced that you may feel unreasonable, which was due solely to management of a variety of issues we were experiencing at the time.

If you have any questions on the content of this letter please contact me.

Yours faithfully,



Caitriona Harvey

Arweinydd Tîm Rheoliad Diwydiant a Gwastraff Taf ac Elái / Industry and Waste Regulation Taff & Ely Team Leader

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