

The Company Secretary
Sims Group UK Limited
Long Marston
Stratford Upon Avon
Warwickshire
CV37 8AQ

Our ref: EPR/CP3795FY

Date: 02/03/2020

Dear Sir/Madam

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

Permit reference: EPR/CP3795FY
Operator: Sims Group UK Limited
Facility: Northside, South Dock, Lexandra Dock, Newport, NP20 2WE

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 30 September 2019 we received a response from to the above request. The information has been reviewed and we require additional information. Please provide the following:

- BAT 1 – Please provide copy of ISO 14001 certificate and provide a summary of residual management plans (BAT 1, XII)
- BAT 4 – In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques; optimising storage location (a), adequate storage capacity (b), safe storage operations (c) and separate area for storage and handling of packaged hazardous waste (d). You have concluded storage and handling of packaged hazardous waste (d) is not applicable but we need more details on how BAT 4 (a-c) requirements are met. Please provide more details (e.g. are storage located as far as possible away from sensitive receptors, storage capacities/residence times etc).
- BAT 10/12/13 - Please provide a copy of your odour Management Plan (as detailed in environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan) that addresses requirements of BAT 10/12/13.
- BAT 11 – Please clarify if water, energy and raw materials are monitored annually.
- BAT 14 – No information provided regarding BAT 14 c and e which are generally applicable. Please provide further details.
- BAT 17/18 – Provide copy of Noise and Vibration Management plan as detailed in Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan that address the requirements of BAT 17 and 18.
- BAT 1 and BAT 23 are not currently compliant and will look to include Improvement Conditions (IC's) to update site operations to meet these requirements.
- BAT 25, 26, 27 and 28 – Mechanical treatment of waste (general) and by Shredding – Although the shredder is not currently operational it is still listed on the permit as a listed activity. Please provide details of how these BAT requirements are met. If the Shredder is no longer being utilised and NRW will be informed if shredding operations commence in the future, we could look to include a pre-operation condition. The pre-op condition will request that a BAT assessment would need to be undertaken for the

shredding activity/treatment to ensure it meets the requirements following of the revised Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment before any future shredding operations can commence. There are other BAT conclusions that will need to be considered again if shredding activities commence e.g BAT conclusions regarding Noise and Dust management as well as BAT 19 – optimising waste consumption etc as there will be water injection.

In relation to item 7 of the Regulation 61 Notice you have indicated that *'details addressing the need to review all emissions to surface water and sewers is considered in this review'* however no detailed response has been provided. Please review your current discharges from site, and the guidance noted in the Notice and where necessary submit the results of the screening tests (and modelling) if required or indicate where this is not necessary. You have provided an assessment of dilution potential. Please refer to our H1 guidance "Surface water pollution risk assessment for your environmental permit" (accessible via this link: <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>) carry out the following assessments:

Screening tests for priority hazardous pollutants and any other relevant priority hazardous substances.

For any substance which is not screened out by the screening tests you will need to carry out modelling, as described in the risk assessment guidance "Surface water pollution risk assessment for your environmental permit".

You must provide us with the results from the emissions monitoring, the results from the screening tests and the results from any modelling.

You can use the H1 electronic screening tool to present the emissions data and to carry out the screening tests. We will provide a copy of the tool to your local representative at the site address.

The requirements of the Reg 61 Notice dated the 4th April 2019 have not been fulfilled, please provide all outstanding information within 3 weeks of the date of this letter. If for any reason the missing information can not be provided within this timeframe please contact Kirsty Thomas via email: kirsty.thomas@cyfoethnaturiolcymru.gov.uk or speak to your regulatory officer.

Yours sincerely



Kirsty Thomas MSc, BSc (Hons)
Swyddog Trwyddedu Uwch, Gosodiadau a Thrwyddedu RSR
/Senior Permitting Officer Installations and RSR permitting
Cyfoeth Naturiol Cymru /Natural Resources Wales
Ty Cambria , Caerdydd/Ty Cambria, Cardiff
Ffôn:03000 654552/Tel:03000 654552
E-bost/E-mail:
kirsty.thomas@cyfoethnaturiolcymru.gov.uk

