Cyfoeth Naturiol Cymru
Natural Resources Wales

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

Our ref: EPR/KP3195FW

Date: 02/03/2020

Dear Sir/Madam

Environmental Permitting (England and Wales) Regulations 2016 Permit Review

Request for information

Permit reference: **EPR/KP3195FW (Fridge Plant)**
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 30th September 2019 we received a response from you to the above request. The information has been reviewed and we require additional information. Please provide the following:

- BAT 1 – Confirm if the Environmental Management System (EMS) is ISO 14001 accredited, please provide copy of ISO 14001 certificate if relevant. A summary of the residual management plans (BAT 1, XII) is also required, please provide additional information.
- 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 seperte 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 capcities/residence times etc).
- BAT 8 – There is a requirement to monitor channelled emissions to air at certain frequencies. The site is not currently compliant with the TVOC monitoring requirement and it is detailed that a monitoring plan will be implemented to include monitoring of TVOC at least once every six months (also relates to BAT 29). Can you confirm if this is completed yet and provide detailed information on how the BAT conclusion is met.
- 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 b, c and e which are generally applicable. Please provide further details.
- BAT 17/18 – Provide a copy of the sites Noise and Vibration Management plan as detailed in Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan document that address the requirements of BAT 17 and 18.

- BAT 19 – No detail provided on BAT 19 d and e which are generally applicable. Please provide more detail/clarify if not applicable.
- BAT 1, 8 and BAT 23 are not currently compliant and will look to include Improvement Conditions (IC's) to update site operations to meet these requirements.

In relation to item 7 of the Regulation 61 Notice you have indicated that *'The EMS in place associated with the source of water being discharged (rainfall and biologically treated sewage effluent) indicates there is no clear linkage between the eventual presence of HS and PHS and the water being discharged to the South Dock. As a result of the above, the activities undertaken at the site do not result in the intentional or routine discharge of wastewaters containing hazardous or priority hazardous substances'.* Please provide evidence/further information to justify the statement above that there is no clear linkage. Clarify how the HS and PHS are present in the South Dock.

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)
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Gwefan/Website www.cyfoethnaturiolcymru.gov.uk www.naturalresourceswales.gov.uk
Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English