



**GIG**  
CYMRU  
**NHS**  
WALES

Bwrdd Iechyd Prifysgol  
Cwm Taf Morgannwg  
University Health Board

Your Ref/Eich cyf:

PAN-010159

Our Ref/Ein cyf:

KN / SH / B5VU2307

Date/Dyddiad:

15<sup>th</sup> June 2020

Tel/ffôn:

01443 744864

Fax/Ffacs:

Email/ebost:

[Kelechi.nnoaham@wales.nhs.uk](mailto:Kelechi.nnoaham@wales.nhs.uk)

Dept/Adran:

Public Health

25 JUN 2020

Natural Resources Wales Permitting Service,  
Natural Resources Wales,  
Ty Cambria,  
29 Newport Road,  
CARDIFF.  
CF24 0TP

Dear Sir / Madam,

**Re:- Environmental Permitting (England and Wales) Regulations 2010**

**New Application:- A09 – Hazardous waste transfer station (11,6000 tonnes per annum) at Hampshire Demolition and Recycling Limited, Pengarnddu Industrial Estate Transfer Station, Pengarnddu Industrial Estate, Pengarnddu, Merthyr Tydfil. CF48 2TA**

We welcome the opportunity to comment on this permit application. We have consulted with our colleagues at the Environmental Health Service (delivered collaboratively through Public Health Wales' Health Protection Team and Public Health England's Centre for Radiation, Chemical and Environmental Hazards Wales). This assessment is based on actual or potential health risks from environmental exposures to chemicals, noise and extreme environmental events such as flooding.

#### Proposed Development

The Facility is to occupy an area of approximately 1.73ha and is located on Pengarnddu Industrial Estate. The site was previously operated by Merthyr Industrial Services Limited (MIS) who operated a waste management facility and biomass boiler. That operation was abandoned in December 2014 after court proceedings and numerous piles of waste and plant and equipment were left on the site, the majority of which are still in-situ.

This Permit Application is for the treatment and removal of waste, plant and equipment currently present on the site. MIS left 13 piles of waste on the land at Pengarnddu Industrial Estate. The Proposed Permit Boundary will cover 12 material stockpiles and the operational areas where waste treatment processes will be undertaken. The only waste the Operator intends on importing into the site is the waste present in the material stockpiles referred to as 'Stockpile 13'.

The first stage of the operation is focussed on the treatment of waste material which is currently present on the site – in preparation for recovery, recycling or disposal. Treatment includes segregation, screening, testing and grading for determining onward recycling, energy recovery or other appropriate forms of recovery.

---

#### Cyfeiriad Dychwelyd/ Return Address:

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg, Pencadlys, Parc Navigation, Abercynon, CF45 4SN  
Cwm Taf Morgannwg University Health Board, Headquarters, Navigation Park, Abercynon, CF45 4SN

Cadeirydd/Chair: Professor Marcus Longley

Prif Weithredydd/Chief Executive: Dr Sharon Hopkins

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Cwm Taf Morgannwg  
ICwm Taf Morgannwg University Health Board is the operational name of the Cwm Taf Morgannwg University Local Health Board

The known quantity of waste material within the Proposed Permit Boundary is approximately 2,704.3 tonnes, based on assumed density factors. Redundant plant and machinery from the previous operator also remain on site which is also considered to be waste. The second phase of the operation will involve importing material from Stockpile 13 into the Proposed Permit Boundary. Stockpile 13 comprises approximately 13,982 tonnes of material. Its estimated composition, is as follows:-

- 9,651 tonnes of hazardous trammel fines created by previous screening activities (asbestos has been discovered present within the trammel waste classifying it as hazardous);
- 3,205 tonnes of inert demolition type material; and
- 1,126 tonnes of non-hazardous household waste type material (if separable from trammel fines).

The purpose of the operation is to clear the site of waste in preparation for future uses.

The Facility will have the capacity to process 11,600 tonnes of waste per annum, consisting of 8,550 tonnes of non-hazardous and 3,050 tonnes of hazardous waste, based on 305 operational days per annum. Hazardous material from Stockpile 13 will be imported, treated and exported from the site in a phased approach to ensure no more than 50 tonnes is stored within the Proposed Permit Boundary at any one time.

The site is located approximately 700m to the north of Dowlais Top on the opposite side of the A465, approximately 765m east of Pant, approximately 2.8kms to the west of Rhymney and 3km north east of Merthyr Tydfil. The nearest residential properties are located approximately 192m to the west of the site on an unnamed road. There are a series of unnamed ditches which run around the perimeter of the site, the Nant Carno is located approximately 1012m to the east of the site and there is a covered reservoir located approximately 16m to the west of the site boundary. The site is located above a minor aquifer with variable permeability. The site is not located within a flood zone.

#### Overall Conclusion

We support the application as it will ensure the removal of illegally deposited hazardous and non-hazardous waste which could present a public health threat to communities.

We therefore have no grounds for objection based upon the public health considerations contained within the application and provided the site is operated in line with current sector guidance.

#### Public Health Risk Assessment

The site will operate to the requirements of the applicant's environmental management system (EMS) and be supervised by WAMITAB certified staff. **We would recommend that the operator seeks suitable accreditation for the environmental management system within an agreed timescale with the Regulator.**

There will be no point source emissions to air, land or sewer from the Facility. The applicant has provided a risk assessment for all potential activities concluding that risks will not be significant. Waste fires can burn for extended periods resulting in considerable impact upon local communities and infrastructure. **The applicants fire risk assessment has followed the regulators guidance *Fire Prevention & Mitigation Plan Guidance – Waste Management*, in view of the potential local public health impact from a fire and to minimise risks the Regulator must ensure that the operations are managed in accordance with current guidance.**

---

#### Cyfeiriad Dychwelyd/ Return Address:

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg, Pencadlys, Parc Navigation, Abercynon, CF45 4SN  
Cwm Taf Morgannwg University Health Board, Headquarters, Navigation Park, Abercynon, CF45 4SN

Cadeirydd/Chair: Professor Marcus Longley

Prif Weithredydd/Chief Executive: Mrs Allison Williams

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Cwm Taf Morgannwg  
ICwm Taf Morgannwg University Health Board is the operational name of the Cwm Taf Morgannwg University Local Health Board

The main sources of fugitive emissions will be from the shredding, screening and crushing processes. The prevailing wind direction at the site is from the south west and west south west, with the majority of the sensitive receptors being to the south, east and west of the site. Sector Guidance Note 'S5:06: Guidance on the Recovery and Disposal of Hazardous and Non-Hazardous Waste' references specific controls for minimisation of dust emissions. Good management practices and procedures proposed will minimise emissions and prevent unacceptable levels of dust impacting local receptors **Appropriate assessment and operational management to mitigate fugitive emissions is recommended in line with the applicant's EMS.**

The findings of the odour assessment identify the potential for exposure of odour to anyone living or working close to the site. Key potential impacts identified include odour from the piles of waste when they are moved for treatment as they have been in-situ for a number of years. There is however no indication on the two reports prepared by Opus International Consultants on behalf of MTCBC that there are any obvious biodegradable waste materials. It is estimated that only a small proportion of the waste on site has the potential to generate odorous emissions, <5%, of the total volume. **The applicant has detailed an odour management plan, the regulator should be satisfied the controls are suitable for the operations proposed and any complaints addressed.**

The site is located over a minor aquifer with variable permeability. It is not located with a Source Protection Zone or a Flood Risk Zone. There are two unnamed drainage ditches in the vicinity of the site. There will be a lip installed around the concrete pad on which the waste processing and storage of processed waste occurs to ensure that run off from this area does not enter the drainage ditches. Runoff from the waste processing and storage area will be directed to the interceptor via silt traps before being discharged off site. The silt traps and interceptor will be inspected on a regular basis and maintained in line with manufacturer's instructions. **The Regulator should be satisfied that suitable management controls are included for all operations to ensure mitigation of spills and any complaints addressed.**

The site lies within the industrial estate and there are variety of existing noise sources. The impact from noise had been assessed using recognised methodology and the impact to noise sensitive receptors is considered negligible. **The Regulator should be satisfied that suitable management controls are included for all operations to ensure mitigation of noise and any complaints addressed.**

We trust this will help with your overall decision and would be happy to review any additional information obtained by the Regulator in relation to these comments.

Yours faithfully,



**Professor Kelechi Nnoaham**  
**Cyfarwyddwr Iechyd y Cyhoedd**  
**Director of Public Health**

c.c. Deborah Purnell, Senior Administrator, Centre for Radiation, Chemical and Environmental Hazards  
(Wales), Public Health England, Cardiff Metropolitan University, Western Avenue, Cardiff. CF5 2YB

---

**Cyfeiriad Dychwelyd/ Return Address:**

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg, Pencadlys, Parc Navigation, Abercynon, CF45 4SN  
Cwm Taf Morgannwg University Health Board, Headquarters, Navigation Park, Abercynon, CF45 4SN

Cadeirydd/Chair: Professor Marcus Longley

Prif Weithredydd/Chief Executive: Mrs Allison Williams

Bwrdd Iechyd Prifysgol Cwm Taf Morgannwg yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Cwm Taf Morgannwg  
ICwm Taf Morgannwg University Health Board is the operational name of the Cwm Taf Morgannwg University Local Health Board

