

Mr. Michael Knott  
Sirius Environmental Limited  
The Beacon Centre for Enterprise  
Dafen  
Llanelli  
SA14 8LQ

**Our ref: PAN- 010745**

**Date: 25<sup>th</sup> September 2020**

Dear Mr. Knott

**We need more information about your application**

**Application reference: PAN-010745**  
**Operator: Biffa Waste Services Limited**  
**Facility: Cardiff Waste Management Resource Centre**

Thank you for your application received on 18/06/2020.

We need to ask you for some more information before we can do any more work on it.  
Please would you provide the following information:

- Complete question 3c on Form B3.
- Provide a Fire Prevention and Mitigation Plan in line with our guidance <https://naturalresources.wales/media/684379/guidance-note-16-fire-prevention-mitigation-plan-english.pdf>. If you are applying for an environmental permit that authorises you to store combustible waste, you to have a Fire Prevention and Mitigation Plan (FPMP). This should its own document that forms part of your management system.
- A BAT assessment for the Waste Treatment activities to take place on the site should be in line with the revised Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment published in August 2018. Please see attached spreadsheet with listed BAT conclusions. There will be similarities to the Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste referenced in your report but your BAT assessment should be based on the recently published revised BRef for Waste Treatment which is not referenced in the documents provided. Please review and provided updated documentation in line with the Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment. The Waste Treatment BAT standards are also not listed in the application form B3 under technical standards.
- 6.13.17 of the Supporting Statement (Document Reference: BF5023/05) states that

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

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English

designated sites were included in the both the Fugitive Risk Assessment (Doc. Ref.: BF5023/06/FRA) and Accident Risk Assessment (Doc. Ref.: BF5023/06/ARA). I cannot see how these receptors have been considered in the above risk assessments (emissions risk assessment matrix). Please submitted details/updated reports to include assessment of impacts of designated sites. Note – there is also a Local Wildlife Site in close proximity to the installation.

- There are residential receptors within close proximity to the installation. The noise impact assessment does not appear to include consideration for vibrations. There are details on process controls in place to minimize vibration impacts in the Supporting Statement but please confirm the operations do not need a further detail vibration assessment.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee.

If you email or write to us please quote the application reference PAN-010745 on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions please email [kirsty.thomas@naturalresourceswales.gov.uk](mailto:kirsty.thomas@naturalresourceswales.gov.uk).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'K. Thomas', with a stylized flourish at the end.

**Kirsty Thomas**  
**Senior Permitting Officer**