

# Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

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**Dŵr Cymru Cyfyngedig**

**Cog Moors Wastewater Treatment Works  
Advanced Anaerobic Digestion Facility  
Green Lane  
Dinas Powys  
CF64 2TR**

Permit number

**EPR/BB3891CG**

# **Cog Moors Wastewater Treatment Works Advanced Anaerobic Digestion Facility Permit number EPR/BB3891CG**

## **Introductory note**

### **This introductory note does not form a part of the permit**

The main features of the permit are as follows.

This permit regulates the recovery of non-hazardous waste with a capacity exceeding 100 tonnes per day involving biological treatment, which is an activity covered by the description in Section 5.4 Part A(1)(b)(i) at Cog Moors Wastewater Treatment Works Advanced Anaerobic Digestion (AAD) Facility. The AAD facility is an extension to the existing Cog Moors Wastewater Treatment Works (WwTW) Anaerobic Digestion (AD) plant, the AAD facility incorporates new and existing infrastructure. The facility is located west of Cardiff, approximately 2 km east of Barry and 1 km south of Dinas Powys. It lies within the boundary of Vale of Glamorgan County Council. The surrounding areas are predominantly rural countryside and farmland with the closest residential receptors located approximately 250 m to the east and 290 m to the south.

The site is within 10 km of the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar. The site is within 2 km of Cog Moors Site of Special Scientific Interest (SSSI), Cosmeston Lakes SSSI and several Local Wildlife Sites, Local Nature Reserves and Ancient Woodlands.

The installation uses wastes which is a blended combination of sludge imports from other Dŵr Cymru sites and indigenous sludge from the Cog Moors WwTW for anaerobic digestion. Cambi Thermal hydrolysis breaks down the sludge into an easily digestible feed prior to anaerobic digestion, it uses steam generated from two 4.408 MW thermal input natural gas boilers to increase the temperature and control the pressure to pre-treat the sludge. The boilers are predominantly expected to use natural gas as fuel but can use biogas if required. The sludge is then cooled via water coolers to 37 °C which is the optimum temperature for anaerobic digestion, which is carried out in four digesters.

The biogas produced from anaerobic digestion is transferred to a gas holder, via a siloxane removal plant to two Combined Heat and Power (CHP) engines for use as a fuel to produce electricity and heat. The two CHP engines have a thermal input of 3.679 MW and an electrical output of 1.5 MW, they will use 100 % biogas as fuel. The CHP engines will be operational for 8760 hours per annum, any excess heat produced will be used to supplement the thermal hydrolysis process. A waste gas burner will be used to flare off biogas only in emergency conditions and maintenance periods.

There are two post digestion tanks and three centrifuges which will dewater the resultant digestate from the anaerobic digestion process, this will separate the solids from liquids producing a cake fraction and a liquid fraction. The solid cake fraction will be stored awaiting collection by a licensed waste contractor. The liquid fraction will be returned to the head of the adjacent existing Cog Moors WwTW.

There are three odour control units (OCU) used to treat the malodorous air from the various treatment processes, they use a two-stage process using two different filters (a biofilter then a carbon filter).

There are a total of fourteen emission points to air, four are related to the combustion processes, four are relief vents from the four digestion tanks, three are related to the OCUs, the remaining three emission points are related to the siloxane removal plant, waste gas burner (emergency flare) and a pressure relief valve on the biogas holder.

There is one discharge to sewer, all surface water and process waters are contained within the sealed drainage system and returned to the head of the adjacent existing Cog Moors WwTW.

Dŵr Cymru Cyfyngedig have an Environmental Management System (EMS) that is externally accredited to ISO 14001, Cog Moors WwTW is within scope of this EMS.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application EPR/BB3891CG/A001	Duly made 17/04/20	Application for a new bespoke installation for an advanced anaerobic digestion facility at existing Cog Moors WwTW
Additional information received	05/05/20	Information received regarding air emissions risk assessment.
Additional information received	22/05/20	Information received regarding odour impact modelling.
Additional information received	14/07/20 & 14/09/20	Information received regarding containment measures.
Permit determined EPR/BB3891CG	05/11/20	Permit issued to Dŵr Cymru Cyfyngedig

End of introductory note

# Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

**EPR/BB3891CG**

The Natural Resources Body for Wales (“Natural Resources Wales”) authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

**Dŵr Cymru Cyfyngedig** (“the operator”),

whose registered office is:

**Pentwyn Road  
Nelson  
Treharris  
Mid Glamorgan  
CF46 6LY**

company registration number **02366777**

to operate an installation at

**Cog Moors Wastewater Treatment Works Advanced Anaerobic Digestion Facility  
Green Lane  
Dinas Powys  
CF64 2TR**

to the extent authorised by and subject to the conditions of this permit.

Signed	Date
Holly Noble	05/11/2020

Authorised on behalf of Natural Resources Wales

# Conditions

## 1 Management

### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme

### 1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

### 1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## **2 Operations**

### **2.1 Permitted activities**

- 2.1.1 The operator is only authorised to carry out the activities specified in Schedule 1 Table S1.1 (the “activities”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

### **2.2 The site**

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at Schedule 7 to this permit.
- 2.2.2 For the following activity, reference A2 in schedule 1, table S1.1 no MCP shall be operated beyond the site of the grid reference specified for it in schedule 1, table S1.1 of the permit.

### **2.3 Operating techniques**

- 2.3.1 (a) For the following activities referenced in Schedule 1, Table S1.1. The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in Schedule 1, Table S1.2, unless otherwise agreed in writing by Natural Resources Wales.
- (b) If notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in Schedule 1, Table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 2.3.2 Any raw materials or fuels listed in Schedule 2 Table S2.1 shall conform to the specifications set out in that table.
- 2.3.3 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in Schedule 2 Table S2.2; and
- (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

- 2.3.6 For the following activity, referenced in Schedule 1, Table S1.1 (A2) the activities shall be operated using the techniques and, in the manner, described in Schedule 1, Table S1.2A.

## **2.4 Improvement programme**

- 2.4.1 The operator shall complete the improvements specified in Schedule 1, Table S1.3 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales.
- 2.4.2 Except in the case of an improvement which consists only of a submission to Natural Resources Wales, the operator shall notify Natural Resources Wales within 14 days of completion of each improvement.

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in Schedule 3, Tables S3.1 and S3.2.
- 3.1.2 The limits given in Schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

### **3.2 Emissions of substances not controlled by emission limits**

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### **3.3 Odour**

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, submit to Natural Resources Wales for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

### **3.4 Noise and vibration**

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
  - (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
  - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

### **3.5 Monitoring**

- 3.5.1 The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in Schedule 3 to this permit or at a greater frequency if notified to the operator in writing by Natural Resources Wales:
  - (a) point source emissions specified in Tables S3.1 and S3.2;
  - (b) process monitoring specified in Table S3.3
- 3.5.2 Monitoring shall not take place during periods of start up or shut down
- 3.5.3 For the following activity, referenced in Schedule 1, Table S1.1 (A2) the first monitoring measurements will be carried out within four months of the issue date of the permit or the date when the MCP is first put into operation whichever is later
- 3.5.4 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.5 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by Natural Resources Wales.
- 3.5.6 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in Schedule 3, Tables S3.1 and S3.2 unless otherwise agreed in writing by Natural Resources Wales.

### **3.6 Pests**

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:



- (a) if notified by Natural Resources Wales, submit to Natural Resources Wales for approval within the period specified, a pests management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;
- (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by Natural resources Wales

## 4 Information

### 4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
  - (i) off-site environmental effects; and
  - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.

4.1.3 The operator shall maintain a record of the type and quantity of fuel used the total annual hours of operation for each MCP

4.1.4 The operator shall maintain a record of any events on non-compliance and the measures taken to ensure compliance is restored in the shortest possible time

### 4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production / treatment data set out in Schedule 4, Table S4.2; and
- (c) the performance parameters set out in Schedule 4, Table S4.3 using the forms specified in Table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in Schedule 4, Table S4.1;
- (b) for the reporting periods specified in Schedule 4, Table S4.1 and using the forms specified in Schedule 4, Table S4.4; and

- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to Natural Resources Wales, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

### 4.3 Notifications

- 4.3.1 (a) In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
    - (i) inform Natural Resources Wales,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) in the event of a breach of any permit condition the operator must immediately—
    - (i) inform Natural Resources Wales, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) in the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1(a)(i), or 4.3.1(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in Schedule 5 to this permit within the time period specified in that schedule.
  - 4.3.3 Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.
  - 4.3.4 Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) Natural Resources Wales shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 Natural Resources Wales shall be given at least 14 days' notice before implementation of any part of the site closure plan.

## **4.4 Interpretation**

4.4.1 In this permit the expressions listed in Schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately" in which case it may be provided by telephone.

# Schedule 1 - Operations

**Table S1.1 activities**

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	S5.4 A(1)(b)(i) – Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 100 tonnes per day involving (i) biological treatment	<p>Anaerobic digestion (with a capacity exceeding 100 tonnes per day) of permitted waste types followed by use of biogas produced from the process as a fuel to produce energy.</p> <p><b>R3:</b> Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological/transformation processes).</p> <p><b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>	<p>From receipt of permitted waste through to anaerobic digestion and recovery of by-products.</p> <p>Waste types as specified in Schedule 2 Table S2.2.</p> <p>Heat treatment of permitted waste in the Cambi Thermal Hydrolysis Plant (THP) prior to anaerobic digestion.</p> <p>Anaerobic digestion of permitted waste followed by use of the biogas produced in the anaerobic digestion process as a fuel in the Medium Combustion Plant to produce electricity.</p> <p>Waste acceptance and pre-treatment will take place within covered containers.</p> <p>Activities shall be carried out on an impermeable surface with a sealed drainage system.</p> <p>Total annual throughput of up to 235,636 tonnes of permitted waste.</p>

### Medium Combustion Plant

Activity reference	Activity listed in the EP Regulations	Description of MCP Specified Generator	Limits of specified activity
A2	Schedule 25A – MCP as detailed in Schedule 8 and Specified generator that is excluded	<p>2x 3.679 MWth input CHP engines fuelled on biogas produced by Anaerobic Digestion process. NGR: ST 16249 69581</p> <p>2x 4.408 MWth input natural gas/biogas fuelled boilers to supplement THP process NGR: ST 16248 69599</p> <p>Comprising 1x 16.17 MWth input (aggregated) Medium Combustion Plant</p>	<p>From receipt of fuel to dispatch of combustion products to air.</p> <p>Operating hours not restricted.</p>

### Directly Associated Activity

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A3	Biogas storage and transfer plant	Storage of biogas arising from the anaerobic digestion process.	Storage of biogas prior to use as a fuel in Medium Combustion Plant or burnt in the emergency flare.
A4	Steam and electrical power supply	<b>R1:</b> Use principally as a fuel or other means to generate energy	<p>From receipt of biogas produced by the anaerobic digestion process to dispatch of combustion products to air.</p> <p>Combustion of biogas in Medium Combustion Plant.</p>
A5	Emergency flare operation	<b>D10:</b> Incineration on land	<p>From receipt of biogas produced by the anaerobic digestion process to dispatch of combustion products to air.</p> <p>Use of 1x auxiliary flare required only during periods of breakdown or maintenance of Medium Combustion Plant.</p>
A6	Siloxane removal plant	Removal of siloxane from the biogas through the use of activated carbon filter.	The generation of gas from the anaerobic digestion plant prior to use as a fuel in the Medium Combustion Plant or burnt in the emergency flare.
A7	Digestate storage	<b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced).	From receipt of processed uncertified digestate produced from the anaerobic digestion process to dispatch off-site.

A8	Discharge of condensate	Condensate from the gas pipelines, gas storage and siloxane removal media regeneration process.	From collection to the point of discharge to the adjacent Cog Moors WwTW.
A9	Odour Control Units	Operation of 3x odour control units to treat malodorous air from specified processes. OCU A services the sludge storage tanks, blending tanks and post digestion tanks. OCU B services raw sludge handling. OCU C services the centrifuge feed tank, cake import facility, cake export silos and pre/post digestion centrifuges.	From extraction of air from specified process through the odour control 2-filter system (biofilter then carbon filter).

**Table S1.2 Operating techniques**

Description	Parts	Date Received
Application	All responses to questions of Forms B2 and B3 including all supporting documentation.	04/12/19
Application	Best Available Techniques (BAT) assessment. Document reference: 4793-S-203-HYD-XX-XX-RP-NX-06173 S1 P1 BAT Conclusions	04/12/19
Response to Not Duly Made letter dated 24/02/20	All material submitted in response to Not Duly Made letter dated 24/02/20.	16/04/20
Response to Schedule 5 Notice dated 21/04/20	Document reference: 4793-S-203-HYD-XX-XX-RP-NX-10591 REV P3	05/05/20
Response to Schedule 5 Notice dated 07/05/20	Document reference: 4793-S-203-HYD-XX-XX-RP-NX-10592 Cog Moors WWTW AAD Project Odour Technical Note	22/05/20
Additional information received	Document reference: 4793-S-203-HYD-XX-XX-RP-NX-06167 S1 P2 Noise and Vibration Assessment	22/05/20
Response to Schedule 5 Notice dated 21/05/20	Document reference: 4793-S-203-HYD-XX-XX-RP-NX-10593-S1-P2	14/07/20
Additional information received	Document reference: 4793-S-203-HYD-XX-XX-RP-NX-10593-S1-P4 September 2020	14/09/20
Additional information received	Document reference: Cog Moors WwTW AAD Project ADBA Classification	14/09/20

**Table S1.2A Operating techniques for Medium Combustion Plant as detailed in Schedule 8**

Description
Each MCP must be operated in accordance with the manufacturer's instructions and records must be made and retained to demonstrate this
The operator must keep periods of start-up and shut-down of each MCP as short as possible
There must be no persistent emission of 'dark smoke' as defined in section 3(1) of the Clean Air Act 1993

**Table S1.3 Improvement programme requirements**

<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC1	The Operator shall submit for written approval a methodology for meeting the process parameters listed in Table S3.3 as per BAT 38 for the anaerobic treatment of waste. The methodology shall identify each of the process parameters and detail the frequency and techniques in place to record the data. Where a process parameter cannot be monitored justification should be provided and/or a suitable alternative proposed. The methodology should include trigger levels for each of the parameters with associated procedures in place if trigger levels are exceeded. The operator shall submit the report to Natural Resources Wales for approval by the date specified.	3 months from date of permit issue.
IC2	The operator shall update its existing Environment Management System to incorporate all the activities now covered by this permit in accordance with BAT 1 of the BAT conclusions for Waste Treatment, under Directive 2010/75/EU of the European Parliament and of the Council. The operator shall submit the updated Environment Management System to Natural Resources Wales for approval by the date specified.	3 months from date of permit issue.
IC3	The operator shall update its accident management plan to incorporate all the activities covered by this permit in accordance with BAT 1 and BAT 21 of the BAT conclusions for Waste Treatment, under Directive 2010/75/EU of the European Parliament and of the Council. The operator shall submit the accident management plan to Natural Resources Wales for approval by the date specified.	3 months from date of permit issue.
IC4	The operator shall update its noise and vibration management plan to incorporate all the activities covered by this permit in accordance with BAT 1, BAT 17 and BAT 18 of the BAT conclusions for Waste Treatment, under Directive 2010/75/EU of the European Parliament and of the Council and the H3 Horizontal Guidance. The operator shall submit the noise and vibration management plan to Natural Resources Wales for approval by the date specified.	3 months from date of permit issue.
IC5	The operator shall submit for written approval a report by a qualified engineer (or equivalent) confirming that the proposed containment system has been constructed to the standards and descriptions provided in the document reference: 4793-S-203-HYD-XX-XX-RP-N-X-10593-S1-P4 September 2020. The report should reference the CIRIA 736 guidance. The operator shall submit the report to Natural Resources Wales for approval by the date specified.	3 months from date of permit issue.

## Schedule 2 - Waste types, raw materials and fuels

**Table S2.1 Raw materials and fuels**

Raw materials and fuel description	Specification
Natural gas	-
Biogas	-

**Table S2.2 Permitted waste types for anaerobic digestion process**

<b>Maximum quantity</b>	<b>235,636 tonnes per annum</b>
Waste code	Description
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>
<b>19.08</b>	<b>wastes from waste water treatment plants not otherwise specified</b>
19.08.01	screenings
19.08.02	waste from de-sanding
19.08.05	sludges from treatment of urban waste water
19.08.99	centrate liquor only
<b>19.09</b>	<b>wastes from the preparation of water intended for human consumption or water for industrial use</b>
19.09.02	sludges from water clarification
19.09.03	sludges from decarbonation
19.09.06	solutions and sludges from regeneration of ion exchangers
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20.03</b>	<b>other municipal wastes</b>
20.03.04	septic tank sludge
20.03.06	waste from sewage-cleaning
20.03.99	cesspool waste and other sewage sludge only



## Schedule 3 – Emissions and monitoring

**Table S3.1 Point source emissions to air – emission limits and monitoring requirements**

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [point A1 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	3.679 MWth input CHP engine fuelled on biogas 'CHP Unit A'	Sulphur dioxide	40 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14791
		Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	190 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14792
		Carbon monoxide	No limit set	Periodic (average over one hour)	Annually	MCERTS BS EN 15058
A2 [point A2 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	3.679 MWth input CHP engine fuelled on biogas 'CHP Unit B'	Sulphur dioxide	40 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14791
		Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	190 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14792
		Carbon monoxide	No limit set	Periodic (average over one hour)	Annually	MCERTS BS EN 15058
A3 [point A3 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	4.408 MWth input boiler fuelled on biogas 'Boiler A'	Sulphur dioxide	100 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14791
		Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	200 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14792
		Carbon monoxide	No limit set	Periodic (average over one hour)	Annually	MCERTS BS EN 15058

**Table S3.1 Point source emissions to air – emission limits and monitoring requirements**

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
	4.408 MWth input boiler fuelled on natural gas 'Boiler A'	Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	100 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14792
		Carbon monoxide	No limit set	Periodic (average over one hour)	Annually	MCERTS BS EN 15058
A4 [point A4 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	4.408 MWth input boiler fuelled on biogas 'Boiler B'	Sulphur dioxide	100 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14791
		Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	200 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14792
		Carbon monoxide	No limit set	Periodic (average over one hour)	Annually	MCERTS BS EN 15058
	4.408 MWth input boiler fuelled on natural gas 'Boiler B'	Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	100 mg/m <sup>3</sup> Note 1	Periodic (average over one hour)	Annually	MCERTS BS EN 14792
		Carbon monoxide	No limit set	Periodic (average over one hour)	Annually	MCERTS BS EN 15058
A5 [point A5 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Siloxane removal plant	Siloxane	No limit set	-	-	-

**Table S3.1 Point source emissions to air – emission limits and monitoring requirements**

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
A6 [point A6 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Odour Control Unit A	Odour	1000 OU <sub>E</sub> /Nm <sup>3</sup>	None specified	Every 6 months	BS EN 13725
A7 [point A7 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Odour Control Unit C	Odour	1000 OU <sub>E</sub> /Nm <sup>3</sup>	None specified	Every 6 months	BS EN 13725
A8 [point A8 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Odour Control Unit B	Odour	1000 OU <sub>E</sub> /Nm <sup>3</sup>	None specified	Every 6 months	BS EN 13725
A9 [point A9 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Waste gas burner (emergency flare stack)	Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	No limit set	Periodic (average over one hour)	Annually <sup>Note 2</sup>	BS EN 14792
		Carbon monoxide	No limit set	Periodic (average over one hour)	Annually <sup>Note 2</sup>	BS EN 15058
		Total Volatile Organic Compounds (VOCs) (as carbon)	No limit set	Periodic (average over one hour)	Annually <sup>Note 2</sup>	BS EN 12619
A10 [point A10 document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Primary digester Tank A – gas relief valve	No parameters set	No limit set	-	-	-

**Table S3.1 Point source emissions to air – emission limits and monitoring requirements**

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
A11 [point A11 document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Primary digester Tank B – gas relief valve	No parameters set	No limit set	-	-	-
A12 [point A12 document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Primary digester Tank C – gas relief valve	No parameters set	No limit set	-	-	-
A13 [point A13 document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Primary digester Tank D – gas relief valve	No parameters set	No limit set	-	-	-
A14 [point A14 document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points]	Biogas holder – pressure relief valve	No parameters set	No limit set	-	-	-

Note 1: Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised oxygen content of 6 % for solid fuels, 15 % for engines and gas turbines and 3 % all other MCPs

Note 2: Monitoring to be undertaken in the event the emergency flare has been operational for over 10 % of the year, equating to 876 hours per year.

**Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements**

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. Unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
S1 [point S1 on document reference 4793-S-203-HYD-XX-XX-DR-NX-08006_Emission Points] emission to adjacent Cog Moors WwTW	Waste waters, process waters and site drainage	No parameters set	No limit set	-	-	-

**Table S3.3 Process monitoring requirements**

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications Note 1
Digester feed	pH	To be agreed in writing with Natural Resources Wales	To be agreed in writing with Natural Resources Wales	Subject to approved methodology in improvement condition 'IC1' and as agreed with Natural Resources Wales
	Alkalinity			
	Hydraulic and organic loading rates			
Digester	Operating temperature	To be agreed in writing with Natural Resources Wales	To be agreed in writing with Natural Resources Wales	
	Liquid and foam levels			
	Concentration of ammonia			
	Concentration of VFAs			
	Alkalinity			
	FOS/TAC ratio (VFA/TA)			
Digestate	pH	To be agreed in writing with Natural Resources Wales	To be agreed in writing with Natural Resources Wales	
	Concentration of VFAs			
	Ammonia			
Biogas from digesters	Flow	To be agreed in writing with Natural Resources Wales	To be agreed in writing with Natural Resources Wales	
	Quantity			
	Pressure			
	Composition			
	Methane			
	Hydrogen sulphide			
	Carbon dioxide			

Note 1: There is no requirement to report process monitoring data. The information shall be made available at the installation for inspection.

## Schedule 4 - Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

**Table S4.1 Reporting of monitoring data**

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1.	A1, A2, A3, A4, A6, A7, A8, A9	Every 12 months	1 January

**Table S4.2: Annual production/treatment**

Parameter	Units
Biogas produced by anaerobic digestion process	m <sup>3</sup>
Total amount of waste treated	tonnes

**Table S4.3 Performance parameters**

Parameter	Frequency of assessment	Units
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MWh
Energy efficiency	Annually	MWh/m <sup>3</sup> biogas
Electrical energy drawn from the grid	Annually	MWh
Electrical energy exported to the grid	Annually	MWh
Generation of residues	Annually	tonnes
Generation of wastewater	Annually	m <sup>3</sup>
Total raw material used	Annually	tonnes
Amount of biogas combusted in the Medium Combustion Plant	Annually	m <sup>3</sup> /day
Amount of biogas sent to the emergency flare	Annually	m <sup>3</sup>
Operational time of waste gas burner (emergency flare)	Annually	% of operational time

**Table S4.4 Reporting forms**

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	05/11/20
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	05/11/20
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	05/11/20
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	05/11/20
Waste Subject to Conditions 4.2.5	Waste tonnage return form from the Environment Agency website or other form as agreed in writing by Natural Resources Wales	N/A

# Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

## Part A

Permit Number	EPR/BB3891CG
Name of operator	
Location of Facility	
Time and date of the detection	

<b>(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

<b>(b) Notification requirements for the breach of a permit condition</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	



Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

<b>(c) In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment:</b>	
<b>To be notified within 24 hours of detection</b>	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

<b>Name*</b>	
<b>Post</b>	
<b>Signature</b>	
<b>Date</b>	

\* authorised to sign on behalf of the operator

## Schedule 6 - Interpretation

*“accident”* means an accident that may result in pollution.

*“Annex I”* means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

*“Annex II”* means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

*“application”* means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

*“authorised officer”* means any person authorised by Natural Resources Wales under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

*“background concentration”* means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

*“building”* means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

*“combined heat and power” or “CHP” or “Cogeneration”* means the simultaneous generation in one process of thermal energy and electrical or mechanical energy

*“disposal” or “D”* means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

*“emissions to land”* includes emissions to groundwater.

*“EP Regulations”* means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

*“emissions of substances not controlled by emission limits”* means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

*“first put into operation”* means that the plant must have been fired with its design fuel up to its full load. This can be, but does not have to be, during commissioning

*“groundwater”* means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

*“hazardous property”* has the meaning in Annex III of the Waste Framework Directive

*“hazardous waste”* has the meaning given in the Hazardous Waste (Wales) Regulations 2005 (as amended)

*“hazardous substance”* means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008

*“Industrial Emissions Directive”* means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

*“MCERTS”* means the Environment Agency’s Monitoring Certification Scheme.

*“medium combustion plant” or “MCP”* means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW

*“Medium Combustion Plant Directive” or “MCPD”* means Directive 2015/2193/EU of the European Parliament and of the Council of the limitation of emissions of certain pollutants into the air from medium combustion plants.

*“operating hours”* means the time, expressed in hours, during which a combustion plant is operating and discharging emissions into the air, excluding start-up and shut-down periods

*“Pests”* means Birds, Vermin and Insects.

*“quarter”* means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

*“recovery” or “R”* means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

*“residue”* means the solid waste generated by the waste treatment activity and is not directly related to the type of waste treated in the plant

*“specified generator” or “SG”* means has the meaning given in paragraph 2(1) of Schedule 25B of the EP Regulations

*“Solvent Emissions Directive”* means Directive 1999/13/EC (as amended by Directive 2004/42/EC) on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations.

*“Waste code”* means the six-digit code referable to a type of waste in accordance with the list of wastes established by Commission Decision 2000/532/EC as amended from time to time (the ‘List of Wastes Decision’) and in relation to hazardous waste, includes the asterisk.

*“Waste Framework Directive” or “WFD”* means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste

*“Waste Treatment BAT Conclusions”* means the BAT Conclusions for the Waste Treatment sector published as a Commission Implementing Decision EU 2018/1447 in the Official Journal of the EU on 17 August 2018

*“year”* means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- (a) in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of:
  - 15 % for engines/turbines
  - 3 % for all other processes
- (b) in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

## Schedule 7 - Site plan



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## Schedule 8 – Annex 1 of MCPD

1. Rated thermal input (MW) of the medium combustion plant.	<p>CHP A – serial number 2214821 – 3.679 MW</p> <p>CHP B – serial number 2214826 – 3.679 MW</p> <p>Boiler A – serial number 49/7232 – 4.408 MW</p> <p>Boiler B – serial number 49/7231 – 4.408 MW</p> <p>Aggregated rated thermal input: 16.17 MW</p>
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	<p>CHP A: engine</p> <p>CHP B: engine</p> <p>Boiler A: other medium combustion plant</p> <p>Boiler B: other medium combustion plant</p>
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	<p>CHP A: 100 % biogas</p> <p>CHP B: 100 % biogas</p> <p>Boiler A: 1.75 % biogas, 98.25 % natural gas</p> <p>Boiler B: 1.75 % biogas, 98.25 % natural gas</p>
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	Expected start of operation: 2020
5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code).	E37.0 - Sewerage
6. Expected number of annual operating hours of the medium combustion plant and average load in use.	8760 hours
7. Where the option of exemption under Article 6(3) or Article 6(8) is used, a declaration signed by the operator that the medium combustion plant will not be operated more than the number of hours referred to in those paragraphs.	N/A
8. Name and registered office of the operator and, in the case of stationary medium combustion plants, the address where the plant is located.	<p><i>Registered operator address:</i></p> <p>Dŵr Cymru Cyfyngedig, Pentwyn Road Nelson Treharris Mid Glamorgan CF46 6LY</p> <p><i>Address of MCP location:</i></p> <p>Cog Moors Wastewater Treatment Works Green Lane Dinas Powys CF64 2TR</p>

END OF PERMIT