

Caerphilly County Borough Council
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Dear Emma,

**Environmental Permitting Regulations 2016
Pre-Application Advice for Tir-Y-Berth Depot Permit EPR-AF4027401**

Following pre-application discussions with you on the telephone, Natural Resources Wales provide the following answers to your queries and make the following comments:

- Application Form C6 - The SIC 2007 relates to waste activities so is unlikely to be relevant to your activity, and therefore does not need to be completed
- A H1 assessment will only need to be completed if there are any substances to be discharged that are listed in the "*Horizontal Guidance H1 Environmental Risk Assessment Annex D*", Appendix A or any other harmful substances
- If a discharge is made up of both domestic sewage and trade effluent e.g. from vehicle washing, the discharge is considered a trade effluent discharge for the purposes of the environmental permit
- The monitoring undertaken shows that the discharge flow into the waste water treatment plant is highly variable. The attached drainage plan appears to show that separate surface/storm water and foul systems exist. Highly variable flows are typically associated with systems that carry both foul and surface/storm water. Highly variable flows can cause effluent to pass through a system faster without having chance to be treated. This can cause pollution and / or increase volumes that need to be treated.

Action: We strongly encourage Caerphilly County Borough Council to discharge all contaminated surface water and foul water to the Dwr Cymru Welsh Water sewage network, decommission their waste water treatment system and surrender their environmental permit. Please let me know what Caerphilly County Borough Council wish to do as soon as possible.

Action: If Caerphilly County Borough Council wish to continue to discharge their waste water from site to surface water via a waste water treatment system, we ask that Caerphilly County Borough Council survey and review their drainage systems on site as soon as possible to establish what is causing the highly variable flows. Please let me know when Caerphilly County Borough Council plan to do this and how they will report back findings and possible solutions to any issues encountered.

Should you have any queries regarding this letter, please let me know.

Regards,

Luke Burton
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