



Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board

Your Ref/Eich cyf:	
Our Ref/Ein cyf:	KN / SH / B4WS1763
Date/Dyddiad:	1 st May 2019
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Dept/Adran:	Public Health

Mr. Karl Lombardi,
Natural Resources Wales,
Cambria House,
29 Newport Road,
Cardiff.
CF24 0TP

Dear Mr. Lombardi,

**Re:- Environmental Permitting (England and Wales) Regulations 2010
Application by Biffa Waste Services Ltd to vary their existing permit to allow the addition of an asbestos picking station at Trecatti Landfill Site, Merthyr Tydfil. CF48 4AB**

We have consulted with our colleagues at the Environmental Public Health Service (delivered collaboratively through Public Health Wales' Health Protection Team and Public Health England's Centre for Radiation, Chemical and Environmental Hazards Wales).

Proposed Operations

The applicant proposes to include an asbestos picking station to the site, this will comprise the removal of visible asbestos containing material fragments from waste by hand picking within a containerised picking station. The processed asbestos will be disposed of within the existing asbestos cell on the landfill site. The remaining soil will be disposed of within the landfill void (if not contaminated with hydrocarbons) or be directed to the onsite multipurpose treatment pad for further treatment (if contaminated with hydrocarbons) prior to being disposed of within the landfill.

The site is currently regulated as a landfill for the acceptance of non-hazardous and stable non-reactive waste, in addition the site has a multipurpose waste treatment pad, which is currently authorised to allow treatment and bioremediation of hazardous and non-hazardous waste soils and sludges, and green waste composting.

Overall Conclusion

We have no grounds for objection based upon the public health considerations contained within the application.

Public Health Risk Assessment

The applicant has provided a risk assessment for the asbestos picking station concluding that risks will be low. The applicant has not indicated if the activity will be operated in compliance with an environmental management system (EMS). **We would recommend that the regulator seeks an accredited environmental management system within an agreed timescale.**

Waste stockpiles will be maintained in moist condition or covered to minimise potential for wind whipping or dust release. Fugitive dusts will be controlled by maintaining good site management. Hydrocarbon contaminated soils have the potential to contain odorous organic substance, site acceptance criteria and

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Cadeirydd/Chair: Professor Marcus Longley

Prif Weithredydd/Chief Executive: Mrs Allison Williams

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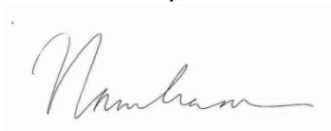
sheeting will be used to control emissions. Fire risks are deemed as low, as wastes are non-combustible, and the site will be secure.

To ensure control of the dust and odour hazards we would emphasise that only wastes meeting the permitted acceptance criteria be received for treatment and that any wastes suspected of failing to meet the criteria are removed off-site promptly. We would also expect to see a dust management plan implemented to control fugitive dusts.

Impact from noise was assessed and conclude that activities will not give rise to a significant impact at noise sensitive premises. Mitigation measures have been proposed to reduce any impact.

Any additional information obtained by the Regulator in relation to these comments should be sent to us for consideration. Such information could affect the comments made in this response.

Yours sincerely,



Professor Kelechi Nnoaham
Director of Public Health
Cwm Taf Morgannwg University Health Board

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