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**From:** Ross, Stuart <Stuart.Ross@cyfoethnaturiolcymru.gov.uk>

**Sent:** 26 January 2018 08:03

**To:** Mark Griffiths <Mark.Griffiths@thesiriusgroup.com>; Ruth Richards

<Ruth.Richards@fccenvironment.co.uk>; Matthew Hayes

<Matthew.Hayes@fccenvironment.co.uk>; Lucy Edds <Lucy.Edds@thesiriusgroup.com>

**Cc:** Roberts, Anthony <Anthony.Roberts@cyfoethnaturiolcymru.gov.uk>; Bradford, Julie  
<Julie.Bradford@cyfoethnaturiolcymru.gov.uk>

**Subject:** RE: FCC Environment - Pen y Bont Landfill Environmental Permitting Works

Mark,

I have reviewed your e-mail and discussed your proposed approach with our permitting team.

Provided the land to be surrendered is outside of the landfill footprint we can approach the partial surrender as we would for any other type of installation.

I would consider that the site condition report will most likely require a limited amount of intrusive monitoring but it is ultimately up to FCC to justify the approach. Looking at the site plan provided I would imagine a low risk surrender approach (desk study) may possibly suffice for the western and eastern flanks if it can be demonstrated that they have been unaffected by operations and potentially for some of the concrete yard areas where it can be shown that the concrete (and joints) are in good condition and any historical pollution incidents have been recorded and evidence of remediation provided.

Taking a risk based approach, some of the concrete yard apron and the soil stockpile area may require intrusive examination to demonstrate that the activities have not caused any contamination, this may include the areas beneath / in the immediate vicinity of the leachate storage tanks and transfer areas, fuel and lubricating oil store, wheel wash and workshops etc. The report should assess records of incidents, maintenance, inspection and control measures in place and, the likelihood of contamination having occurred (providing suitable evidence). This should be used as the basis for justifying whether or not intrusive investigation is required.

In terms of determining the revised permit boundary. perimeter monitoring wells (gas/groundwater) can be outside of the permit boundary, surface water drainage infrastructure (e.g. ditches culverts pipes and lagoons) and gas collection infrastructure (e.g. gas collection mains) should typically be inside.

I hope that helps – happy to discuss..

Regards,

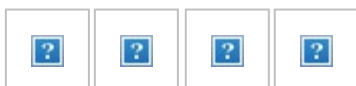
**Stuart Ross, AIEMA**  
Regulatory Officer, Industry Regulation Team  
Swyddog Rheoliadol, Tim Rheoliad Diwydiant  
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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg / Correspondence welcomed in both Welsh and English.

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**From:** Ross, Stuart

**Sent:** 23 January 2018 11:55

**To:** 'Mark Griffiths' <[Mark.Griffiths@thesiriusgroup.com](mailto:Mark.Griffiths@thesiriusgroup.com)>

**Subject:** RE: FCC Environment - Pen y Bont Landfill Environmental Permitting Works

Mark,

Apologies for the delay in getting back to you, I have drafted a response to your query and I'm just waiting for comment from our permitting team. I don't want to give you guidance without their input as ultimately they will be determining your partial surrender application. Hopefully I will get back to you tomorrow.

Regards,

Stuart

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**From:** Mark Griffiths [<mailto:Mark.Griffiths@thesiriusgroup.com>]

**Sent:** 05 January 2018 11:32

**To:** Roberts, Anthony <[Anthony.Roberts@cyfoethnaturiolcymru.gov.uk](mailto:Anthony.Roberts@cyfoethnaturiolcymru.gov.uk)>; Ross, Stuart <[Stuart.Ross@cyfoethnaturiolcymru.gov.uk](mailto:Stuart.Ross@cyfoethnaturiolcymru.gov.uk)>

**Cc:** Ruth Richards <[Ruth.Richards@fccenvironment.co.uk](mailto:Ruth.Richards@fccenvironment.co.uk)>; Matthew Hayes <[Matthew.Hayes@fccenvironment.co.uk](mailto:Matthew.Hayes@fccenvironment.co.uk)>; Lucy Edds <[Lucy.Edds@thesiriusgroup.com](mailto:Lucy.Edds@thesiriusgroup.com)>

**Subject:** RE: FCC Environment - Pen y Bont Landfill Environmental Permitting Works

Thanks for the update Tony, I look forward to hearing from you in due course

Kind regards

Mark



**Mark Griffiths** | Environmental Director | Environmental

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**From:** Roberts, Anthony [<mailto:Anthony.Roberts@cyfoethnaturiolcymru.gov.uk>]  
**Sent:** 05 January 2018 11:01  
**To:** Mark Griffiths <[Mark.Griffiths@thesiriusgroup.com](mailto:Mark.Griffiths@thesiriusgroup.com)>; Ross, Stuart <[Stuart.Ross@cyfoethnaturiolcymru.gov.uk](mailto:Stuart.Ross@cyfoethnaturiolcymru.gov.uk)>  
**Cc:** Ruth Richards <[Ruth.Richards@fccenvironment.co.uk](mailto:Ruth.Richards@fccenvironment.co.uk)>; Matthew Hayes <[Matthew.Hayes@fccenvironment.co.uk](mailto:Matthew.Hayes@fccenvironment.co.uk)>; Lucy Edds <[Lucy.Edds@thesiriusgroup.com](mailto:Lucy.Edds@thesiriusgroup.com)>  
**Subject:** Re: FCC Environment - Pen y Bont Landfill Environmental Permitting Works

Hi Mark,

Thanks for the e-mail. Stuart is the lead Officer for the site and I will be discussing the meeting with him shortly so that he is aware of developments and proposals before he replies.

Best wishes

Tony

Tony Roberts  
**Cyfoeth Naturiol Cymru / Natural Resources Wales**  
Senior Environment Officer/Landfill Gas Technical Specialist  
Industrial Regulation Team, Llwyn Brain, Parc Menai, Bangor. LL574DE  
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**From:** Mark Griffiths <[Mark.Griffiths@thesiriusgroup.com](mailto:Mark.Griffiths@thesiriusgroup.com)>  
**Sent:** 04 January 2018 17:38:23  
**To:** Roberts, Anthony; Ross, Stuart  
**Cc:** Ruth Richards; Matthew Hayes; Lucy Edds  
**Subject:** FCC Environment - Pen y Bont Landfill Environmental Permitting Works

Hi Tony/Stuart

As you are probably no doubt aware, we've been appointed by FCC to prepare a number of environmental permit related documents for its Pen y Bont landfill site near Chirk. This includes a Closure Plan, and subsequent Permit Variation and Part Surrender applications.

I understand that FCC attended a meeting with Tony on Tuesday to discuss the applications, where amongst other things, the scope of the part surrender was discussed. This was put

forward as being supported by a desk study assessment for those areas to be surrendered as they are broadly on the periphery of the overall operations of the site where the potential for contamination is from the permitted operations is low. NRW have requested, however, that the desk based surrender Site Condition Report (sSCR) is supplemented by an appropriate number of trial pits and soil samples.

In order to provide a level of context to the areas proposed to be surrendered, I've attached a sketch plan highlighting the relevant parts of the site to be included in the future application. These are keyed as follows;

- Dark Green – Small square area to western boundary an anomaly which needs correcting (outside FCC's ownership boundary). Eastern and North Eastern flanks at site boundary. These flanks are landscaped/grassed slopes.
- Yellow – Relatively flat former storage area, which is unsurfaced and partially regenerated.
- Orange – Site entrance and infrastructure area which is surfaced with a substantial thickness of reinforced concrete.

The concrete surfacing (orange area) has been in place throughout the length of the landfilling operations, and will therefore have acted as a substantial barrier to any migration of potential surface contamination, which will be the most likely source of influencing the quality of the ground conditions during the course of the permitted activities. The necessity therefore for an intrusive investigation to determine the quality of soils beneath this is questionable in this instance. Any issues with the quality of materials beneath the slab will have been likely attributable to previous operations which are outside the remit of the Environmental Permit.

The unsurfaced yellow area to the north and green areas to the east and north east are unsurfaced, and therefore more accessible to any potential operational influences on ground quality and can be investigated via the use of a JCB and trial pits.

Can you confirm therefore that the surrender Site Condition Report can be derived from both an initial desk study, supplemented by intrusive GI into those areas highlighted above where ground quality has the highest potential to be influenced by previous operations ? Those areas subject to the GI would be the highlighted yellow and eastern flank dark green parts of the attached plan. The dashed green line is the position of the proposed revised permit boundary.

I look forward to hearing from you in due course  
Kind regards  
Mark



**Mark Griffiths** | Environmental Director | Environmental

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