

**Natural Resources Wales permitting decisions**

**Biffa Waste Services Limited -  
(Cardiff Waste Management  
Resources Centre) Decision  
Document**

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## **New bespoke permit**

**The application number: PAN-010745**

**The applicant /operator is: Biffa Waste Services Limited**

The Installation is located at: Waterside Business Park, Lamby Way, Rumney,  
Cardiff, CF3 2EQ

We have decided to grant the permit for Cardiff Waste Management Resources Centre operated by Biffa Waste Services Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

## Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

## Key issues of the decision

### Receipt of application

#### Confidential information

A claim for commercial or industrial confidentiality has not been made.

#### Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.

#### Consultation

The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

A copy of the Application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

We sent copies of the Application to the following bodies, which includes those with whom we have “Working Together Agreements”:

- Cardiff Council Planning Authority
- Cardiff Council Environmental Protection Department
- Health Protection Agency
- Public Health Wales (PHW)/ University Health Board
- Health & Safety Exec
- South Wales Fire and Rescue Service/Fire safety

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

The consultation started on **08/12/2020** and ended on **05/01/2021**.

An advert was also placed on our website.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Annex 3. We have taken all relevant representations into consideration in reaching our determination.

### Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.

### The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.

- S5.3 Part A(1)(a): Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities:
  - (iii) blending or mixing prior to submission to any of the other activities listed in this Section 5.3 or in Section 5.1;
  - (iv) repackaging prior to submission to any of the other activities listed in this Section 5.3 or in Section 5.1;
- S5.6 Part A(1)(a): Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section, except— (i) temporary storage, pending collection, on the site where the waste is generated, or (ii) activities falling within Section 5.2.

Directly Associated Activities (DAA's) also that include the following:

- Treatment and storage of packaging waste - Treatment (washing, crushing and shredding) and storage of non-hazardous packaging waste associated with the hazardous waste transfer/bulking operation only.
- Discharge of surface water - Discharge of surface waters from external operation areas to surface water sewer.
- Fuel and oil storage - Storage of fuel and oils to support the operation of plant and equipment.

The listed activities above form the hazardous waste transfer station installation activity. The site also operates as a non-hazardous transfer station which is classified as a waste operation.

The regulated waste facility is a waste operation at which the following [recovery and disposal] operations will be undertaken. Annex I or Annex II (disposal and recovery) codes are as follows; R3, R4, R5, R13, D9, D14 and D15:

- R3: Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).
- R4: Recycling or reclamation of metal and metal compounds.
- R5: Recycling or reclamation of other inorganic materials.
- R13: 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).
- D9 : Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12.
- D14: Repackaging prior to submission to any of operations numbered D1 to D13.
- D15: Storage pending D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

The installation is a waste transfer station for hazardous waste and a non-hazardous waste operations with an maximum throughput of 7500 tonne per year located at Waterside Business Park, Lamby way, Rhymmy Cardiff centred at national grid reference ST 22019 78619 and operated by Biffa waste services limited.

The site will comprise of external and internal activities. External activity will comprise only of loading/unloading and the storage of empty gas containers. The entire site will be covered by impermeable concrete or tarmac surfacing. Loading and unloading takes place within a designated area that has a sealed drainage with a 6m<sup>3</sup> tank and can be isolated from the surface water drainage.

Internal activities are waste treatment, storage, shredding and crushing. These take place in designated bays within the buildings. Each of the bays will be situated upon impermeable concrete and each bay will have its own sealed drainage systems which drains the collected liquids to a storage tank. The collected liquid in the storage tanks will be emptied and tankered for disposal off site.

There are no direct channelled emissions to air. Discharge to surface water sewer will only consist of uncontaminated surface runoff and limited to 5 l/s. The discharge to surface water sewer goes through multiple oil interceptors and the source is only from external areas on site where no waste treatment or storage is to take place.

### **Legislation**

NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources

All applicable European directives have been considered in the determination of the application.

### **The site**

The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.

A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.

### Site condition report

The operator has provided a description of the condition of the site within the following documents:

- Environmental Permit Application – Site Condition Report.
- PHASE 1 GEO-ENVIRONMENTAL ASSESSMENT LW C-BWB-00-XX-EN-RP-0001\_DS\_P2 AUGUST 2017.
- PHASE 2 GEO-ENVIRONMENTAL ASSESSMENT AUGUST 2017 LW C-BWB-00-XX-EN-RP-0002\_PH2\_P2.

Following the Phase 1 desk study, an intrusive investigation (Phase 2) was carried out on site. Investigation Works included: advancement of four dynamic sampler boreholes to a maximum depth of 5.45m below ground level (bgl); advancement of eight trial pits to a maximum depth of 3.50m bgl; soil and groundwater chemical analysis; soil geotechnical analysis; and Gas and groundwater monitoring.

The underlying geological setting of the site comprise of Tidal Flat Deposits comprising of soft/firm gravelly clay. The bedrock geology at the site is recorded by the BGS as comprising of both the Cae Castell Formation and the Cardiff Group.

Summary of intrusive investigation finding: Ground gas monitoring has identified elevated concentrations of methane and marginally elevated concentrations of carbon dioxide at the site. The results of soil chemical analysis have not identified significantly elevated contaminants when assessed in the context of the commercial development. Asbestos was identified within all Made Ground samples tested. Groundwater analysis identified marginally elevated concentrations of a number of heavy metals and reported exceedances of cyanide, phenol, benzo(a)pyrene and fluoranthene, all at the limit of detection of the equipment.

Due to the low permeability of the underlying Tidal Flat Deposits, there is limited potential for existing contaminants contained within the Tidal Flat Deposits to have percolated into the underlying geology or having been transported via groundwater.

The operator of the proposed site has ensured that appropriate engineered containment infrastructure will be constructed and installed to provide adequate protection of the land from potential contamination associated with the permitted activities. These containment systems will be appropriately maintained throughout the operational life of the facility, with details of any maintenance requirements logged to support future surrender of the site permit.

A description of the sites baseline condition has been provided.

We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).

### **Biodiversity, Heritage, Landscape and Nature Conservation**

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.

A full assessment of the application and its potential to affect the site/species/habitat has been carried out as part of the permitting process. We consider that the application will not affect the features of the site/species/habitat. Further detail is available in the Form 1 (Habitats Regulation Assessment) and Appendix 4 (SSSI assessment), which are available on the public register.

The Form 1 and Appendix 4 assessment was sent to the relevant Natural Resources Wales Environment Team for statutory consultation. However there was no response to the either within the 28 day statutory deadline. Towards the deadline we send a reminder to the area team that the consultation deadline was due but received no response. As no comments have been received, so we have had to assume that the Statutory Nature Conservation Body had no objections to the permit issue.

## Environmental Risk Assessment

### Air

The proposed operations at the facility do not give rise to any substantial point source emissions to air. The accepted waste arrives onsite packaged and/or contained within a sealed container with waste treatment activities undertaken within a building, thereby minimising emissions to air. The only point source emissions as a result of the proposed waste transfer station will be from mobile materials handling plant (such as forklift truck) which are considered to have negligible emissions.

It is anticipated that part of the potential emissions to air from the facility will comprise fugitive emissions resulting from the transfer and treatment of wastes. Fugitive emissions will be minimised by good management procedures and standard operating procedures in place and will be of minimal environmental impact

### Water

All surface water collected from the ancillary areas (areas outside of the storage bays and load/unloading areas) of the site will be directed towards a drainage system and directed through oil interceptors to a designated discharge point from where it is discharged to public surface water sewer at a maximum rate of 5L/s. Ancillary areas comprise of road ways and building roofs from which there is minimal risk of contamination, making the water suitable for discharge without further treatment.

In addition to the dedicated drainage system and discharge point, an attenuation storage tank with a maximum capacity of 420m<sup>3</sup> will be installed along the western boundary of the proposed site. This storage tank will comprise of double skinned construction and will be fitted with both high level and leak detection alarms.

The primary aim of this storage tank will be to provide redundancy to the surface water management system during a storm event when potential inputs to the surface water drainage system exceeds the outflow rate. The capacity of the storage tank was determined following MicroDrainage modelling which examined a 1 in 100-year storm event (+30% for climate change). The modelling indicated that under these conditions

the storage tank would provide storage for up to a 720-minute storm, this would allow time for site staff to arrange for a tanker to remove collected site drainage if necessary. The tank is also to provide containment for fire water in the event of a fire. As outlined in the fire risk assessment and fire prevention and mitigation plan in the event of a fire Penstock 3 will be closed. The volume of water required to tackle a fire in the largest bay for 3 hours would be 106m<sup>3</sup>. The tank volume is therefore sufficient for containment of firewater in the event of a fire and therefore we are satisfied that the tank volume is of a reasonable volume to account for any foreseeable accident.

Loading/Unloading takes place within a designated areas as these activities have a higher risk of contamination due to the potential risk of spillage during the loading and unloading operations. The drainage from this area would be separated from the rest of the surface water system and drain to a 9m<sup>3</sup> tank equipped with a manually operated penstock which can be used to isolate the system and prevent discharge to the environment in the event of an accident. When a leak, spillage or overflow event in the loading/unloading area has been resolved, the drainage in the loading/unloading area will be emptied/cleaned before the isolation chamber is opened to the rest of the drainage system. The collected liquid from the incident will be transport to the appropriate permitted facility for treatment or disposal.

Initially the proposal site drainage had the loading/unloading only covered up to bay 15 but did not cover reception bay (Bay 16). As we believe that the highest risk of spillage would occur during the loading/unloading and transportation to the reception bay we asked the applicant if they considered either extending the isolated drainage area (for loading or unloading) or alternatively reassign the reception bay.

The applicant chose to propose the extension of the loading/unloading area to cover up to the end of Bay 16 and to increase the volume of the isolation tank from 6m<sup>3</sup> to 9m<sup>3</sup>. We have assessed that this is an appropriate measure to cover the area of highest risk with a separate drainage system. If an event does occur and the drain is isolated, the operator will clear out and clean the loading and unloading tank and drainage system prior to the system being opened to the rest of the drainage network. The collected liquids will be sent to an appropriate permitted site for disposal.

Additionally, each storage bay at the proposed facility will be fitted with a dedicated sealed drainage system which will collect any generated liquids and isolate these with a storage sump. The storage sumps for each storage bay will be installed underneath the front of the storage bay. These storage sumps will be accessible from the surface via grid coverings to facilitate the visual inspection of liquid levels by site staff. As such there will be no emissions to water derived from waste storage or processing areas. These sumps will be periodically monitored and emptied by tanker, and the resultant water taken off site for suitable treatment/disposal at an appropriate facility.

All concreted areas will be maintained in a safe condition to provide impervious surface that facilitates everyday cleaning and adequate storage. Highest risk operations will be undertaken over impermeable surfacing with dedicated drainage storage tanks.

There are also spill kits, absorbent granules available for immediate deployment.

Surfaces will be inspected and maintained at regular intervals and any defects or damage will be repaired and good housekeeping will be promoted. A log of maintenance/repair and any pollution/spill incident will be kept as part of the EMS which satisfies the requirements outlined in the Best available techniques conclusion (BAT 1).

All proprietary materials that are required as part of the operations will be stored in accordance with regulations and guidelines set out for their safe containment, e.g. Fuels and Oil as per Natural Resources Wales (NRW's) Guidance. All tanks will be double skinned (self bunded) or provided with bund structures to at least 110% of the largest tank volume or if an aggregation of tanks the bund capacity will equate to at least 25% of the cumulative volume, whichever is the greater.

Foul waters generated at the site welfare facilities will be discharged (under appropriate consent) to foul sewer

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

### Emission limits

We have decided that no emission limits should be set for the discharge to surface water sewer. There are no point source emissions to water other than clean uncontaminated site runoff to the public surface water sewer.

### Soil

The operator has provided a description of the condition of the site.

We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).

As above, there are measures in place to minimise any potential harm to soil. Impermeable surfacing, containment measures and management systems are in place to manage the activities on site. The operator has a duty to ensure that soil and groundwater are protected in order to meet the requirements of Articles 14 (1)(b), 14(1)(e) and 16(2) of the IED.

### Fire prevention and mitigation plan (FPMP)

As a waste transfer station, Biffa Waste services limited was required to submit a fire prevention and mitigation plan (FPMP). The initial FPMP submitted with the application and assess against the Fire Prevention and Mitigation Guidance- Waste Management using the relevant internal check list.

We consulted on the FPMP with the South Wales Fire and Rescue services on 08/12/2020 and received a response on the 04/01/2021. These response and our actions are listed in Annex 3 of this document.

Both the queries raised by the South Wales Fire and Rescue Service and the information identified as missing from our the assessment of the FPMP was sent to the applicant as part of a Schedule 5 on the 08/01/2021. The applicant responded to

the queries on 09/04/2021 with a revised FPMP (BF5023\_07 rev 1) and a Fire prevention Mitigation Plan Risk assessment (FPMP risk assessment). The updated FPMP was reassessed against the guidance and check list and were found to have answered the relevant queries.

We had raised a further query with regards to the freeboard. The operator had proposed a freeboard of 0.6 meters. The guidance states that the minimum freeboard should be 1 meters. After raising this query, the applicant had revised their FPMP (BF5023\_07 rev 2) and increased the freeboard to 1 meters as outlined in the guidance.

There are several aspects have not yet been finalised as the site has not yet been constructed. As these aspects are regarded as lower risk and have not yet been finalised, we had decided requested that the operator submit a revised FPMP after the site has been built but at least 4 months before it is due to start operations. This is reflected in the sections on pre-operational condition and the pre-operational condition can be seen in annex 1 of this document.

## Odour

While we consider that the Applicant's proposals represent the appropriate measures to prevent/ minimise odour from the permitted activities, we also consider that it is appropriate for the site to have an odour management plan in place. This has been integrated as part of the operating techniques.

## Noise

We consider that the activities carried out at the site have the potential to cause noise and/or vibration that might cause pollution outside the site and consider it appropriate to impose specific measures.

The operator had submitted a noise impact assessment (NIA) for the site as part of the application. The noise impact assessment and modelling was completed to BS 4142:2014+A1:2019 and reviewed by the NRW's noise expert team AMQRAT team.

While the noise impact assessment showed only a 2dB increase, it was noted that the report did not take into account acoustic penalties (which could be up to 5 dB). We asked the operator, who responded as to their reason for not using these.

Based on this it was decided that while the noise impact assessment showed no significant increase in noise over the background, noise monitoring would need to be done at the site after commissioning to ensure that the assumptions used for the predictions from the modelling do correspond with the real world operations on the site and if not, the operator would have to put in additional noise abatement. Based on the risk posed by the low level of noise increase predicted, we have decided that it is appropriate to set an improvement condition, requiring that operational noise impact at receptors be assessed, and if necessary mitigation measures proposed and implemented if an adverse effect (or significant adverse effect) is anticipated from noise monitoring.

### **Fugitive emissions**

The operator had submitted a fugitive risk assessment as part of their application. This lists all of the possible fugitive emission risk and the mitigation measure the operator has to minimise the likelihood and impact.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent significant pollution from fugitive emissions.

### **Monitoring**

We have decided that monitoring points for emissions to air at the site are not needed as the site is not expected to have any emission points to air apart from fugitive emissions.

Emissions to surface water sewer will consist only of uncontaminated surface water run-off. Unloading/loading activities occur within a designated area that has a sealed drainage with a 9m<sup>3</sup> tank and can be isolated from the surface water drainage.

All activities are due to take place inside the buildings which will contain isolated drainage. Residue will be collected in sumps and taken off site for appropriate treatment/disposal

As such there is no expected emissions to water, apart from uncontaminated surface water discharge. We have however decided to reference the emission point within the monitoring table but with no limits.

### Reporting

We have specified reporting in the permit.

As there are no expected emissions to air or water (apart from uncontaminated surface water) there are no monitoring limits and therefore no reporting is associated with these. Annual Treatment and performance reporting parameters (on an annual basis) have been specified in Table S4.2 and S4.3 respectively, to ensure site is compliant with best available techniques (BAT), in particular BAT 11.

We made these decisions in accordance with “How to comply with your environmental permit” and Waste Treatment BAT Reference document (BRef) published 10/08/2018.

## Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.

The documents submitted under the application were integrated under the operating techniques. Among these are the safety operating procedures number SOP 1 to SOP 15, the odour management plan, the fire prevention mitigation plan and the supporting statement, which includes details on site operation and compliance and details on the relevant best available techniques (BAT) conclusions that are to be implemented on site.

The applicant had supplied in their supporting statement, how the site will be compliant with the relevant BAT conclusions from the waste treatment BRef review published in 2018. We assessed each of the BAT conclusions against the waste treatment BREF and agreed that they will meet the requirements for compliance with relevant BAT conclusions when the site is complete. The applicant has also made clear which BAT conclusions from the waste treatment BRef are not relevant as these BAT conclusions are not applicable to the activities that are to be conducted at the site. We agree with their reasoning for not include these BAT conclusions.

As the site has no expected emissions to air (other than fugitive emissions) and only discharge is uncontaminated run off to surface water sewer, the BAT emissions limit values were deemed not relevant for this site.

## The permit conditions

### Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

The wastes have been included in three tables: table S2.2 Storage of Waste Oil, Table S2.3 Hazardous Waste Transfer Station Activities and table S2.4 Non-Hazardous Waste Transfer Station Operations.

We are satisfied that the operator can accept these wastes for the following reasons

- Technical competent manager has WAMITAB qualities for managing waster transfer of hazardous waste and managing physical and chemical treatment of hazardous waste.
- The operator already accepts the listed waste at the Cardiff Embankment transfer station located at Curran embankment which this site is to replace. The activities and waste types will mirror those at the Curran embankment site.
- The site will apply the relevant BAT, in accordance with the 2018 Waste Treatment Bref, when commissioned.
- The site has outlined the waste acceptance and storage in the supporting statement. We found this to be satisfactory for the waste they propose to store.

### Pre-operational conditions

Based on the information in the application, we consider that we need to impose pre-operational conditions. Details of the pre-operational conditions used can be found at Annex 1.

The pre-operational conditions are to finalise four aspects of the fire prevention mitigation plan (FPMP) as these aspects relate to aspects of the design of the installation that have not yet been finalised. The operator had agreed to the inclusion of the pre-operational conditions.

### **Improvement Condition**

Based on the information on the application, we consider that we need to impose improvement conditions. Details of the improvement conditions used can be found at Annex 2.

While improvement conditions are not included with new bespoke, the noise impact assessment did not take into account any acoustic penalties (see Noise section of this decision document for more details). Therefore an improvement condition for noise monitoring at the site within 6 months of commissioning was put into the permit in order to confirm the assumptions made in the noise impact assessment or put in additional noise abatement for the site.

### **Incorporating the application**

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.

These descriptions are specified in the Operating Techniques table in the permit.

### **Operator Competence**

#### **Environment management system**

There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

#### **Technical competence**

Technical competency is required for activities permitted.

The operator is a member of an agreed scheme.

WAMITAB Level 4 High Risk Operator Competence for Managing Physical and Chemical Treatment of Hazardous Waste.

WAMITAB Level 4 Diploma in Waste Management Operations : Managing Transfer - Hazardous Waste - 4MTSH.

### **Relevant convictions**

Our Enforcement Database has been checked to ensure that all relevant convictions have been declared.

No relevant convictions were found.

The operator satisfies the criteria in RGN 5 on Operator Competence.

### **Financial provision**

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

The financial provision arrangements satisfy the financial provisions criteria.

### **OPRA**

The OPRA score at permit issue is 105.

## ANNEX 1: Pre-Operational Conditions

Pre-operational condition PO 1, in Table S1.4a:

At least four months before (or other date agreed in writing with Natural Resources Wales) the site is brought online, the Operator shall submit to Natural Resources Wales, and obtain Natural Resources Wales' written approval to it, a revised Fire Prevention and Mitigation Plan (FPMP) for the installation. The report shall follow the FPMP requirements in the most recent guidance available on the Natural Resource Wales website (<https://naturalresources.wales/permits-and-permissions/environmental-permits/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>) or demonstrate equivalence to this, and shall address all outstanding information issues identified by the Operator or Natural Resources Wales. These outstanding issues to be include, but is not limited to the following:

- Final location of Drum Crusher, Shredder and other plant equipment.
- Emergency plan for site to be reviewed and revised as appropriate.
- Update on for firefighting strategy out of operational hours.
- Details on specification of the CCTV systems put in place for detection. (such as CCTV visual flame detection systems, spark, infrared and ultraviolet detection

The revised FPMP submitted shall be single, standalone document detailing all FPMP requirements.

NRW will only approve the FPMP after consultation with, and agreement from South Wales Fire and Rescue Service. Waste shall not be brought onto site until the plan is approved in writing by Natural Resources Wales.

## ANNEX 2: Improvement Conditions

Improvement condition IC1, Table S1.3 as follow:

Following successful commissioning and establishment of routine steady operation, the Operator shall undertake noise monitoring at the nearest local receptors. This shall include:

- A full noise monitoring survey and assessment meeting the BS4142:2014 standard.
- 1/3rd octave and narrow band (FFT) measurements to identify any tonal elements or low frequency noise.
- Reference to the Welsh Government Noise and soundscape action plan 2018-2023.

Upon completion of the work, a written report shall be submitted to Natural Resources Wales for approval. The report shall make reference to the predictions in the report produced in accordance with the Noise impact assessment. If rating levels likely to cause complaints at sensitive receptors are detected, the report shall include an assessment of the most suitable abatement techniques, an estimate of the cost and a proposed timetable for their installation. The operator must implement the plan as approved, including any required improvements, and from the date stipulated by Natural Resources Wales.

## ANNEX 3: Consultation Responses

### A) Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

#### 1) Consultation Responses from Statutory and Non-Statutory Bodies

<b>Response Received from Public Health Wales - Cardiff and Vale University Health Board</b>	
<b>Brief summary of issues raised:</b>	<b>Summary of action taken / how this has been covered</b>
<p>1. No objections provided site compliant with relevant sectoral guidance and Best Available Techniques (BAT).</p> <p>2. Ensure control of fugitive dust/litter, malodorous odours, pests, emissions and managing putrescible wastes by only accepting wastes meeting waste acceptance criteria and wastes failing to meet criteria and removed.</p>	<p>1. BAT assessment carried out to ensure site complies with the Waste Treatments Best Available Techniques Reference Document (Bref) and applicable BAT conclusions. As a new site, site is required to meet BAT requirements immediately.</p> <p>2. Site has Standard Operating Procedure documents (SOP's) for the pre-acceptance and acceptance of waste. Site also has procedures in place for non-conformance and waste rejection.</p>

<p>3. The site will receive flammable liquid waste and it is important that during bulking and transfer that run-off to drains are prevented (Isolated from drainage system) as this could lead to the accumulation of harmful and/or flammable vapours. It is expected that liquid storage containers to be securely locked when not in use to prevent accidental or deliberate release.</p> <p>4. Consult with Fire and Rescue Service.</p>	<p>3. Each drainage channel of each bay will have its own sealed drainage and collection tank which will be taken away appropriately.</p> <p>4. Consultation with Fire and Rescue Service carried out.</p>
<p><b>Response Received from South Wales Fire and Rescue Service</b></p>	
<p><b>Brief summary of issues raised:</b></p>	<p><b>Summary of action taken / how this has been covered</b></p>
<p>1. Confirmation required from Dwr Cymru as to flowrates and pressure provided by identified hydrant. Confirmation also required that hydrant is suitable and sufficient. i.e. accessible and maintained.</p> <p>2. Confirmation required for firefighting strategy out of operational hours. There is mention that there are contact details in the Incident response plan. Will machine operatives be available out of operational hours?</p>	<p>1. Response from operator and Dwr Cymru/Welsh Water regarding water pressure of 2.7 bar and that the fire hydrant is kept in good working order.</p> <p>2. Updated FPMP as part of schedule 5. Confirms strategy for out of hours fire (to be reviewed once site is built). Noted that machine operatives may not be available out of hours but applicant mentioned that given the small pile size the fire could be extinguished</p>

<p>3. With reference to the appendices, there appears to be conflicting information that does not match the site, and subsequently don't match the FPMP. Could you have a look and provide information only for the intended site and FPMP please? Is this the site plan for the intended site? I cannot see the hydrant on the plan in the location that the FPMP identifies. There does not appear to be the same number of bays as detailed in the FPMP etc</p>	<p>rapidly without moving the materials.</p> <p>3. Updated Appendices sent to FRS. List of bays match site plan. Plan with fire hydrant identified included.</p>
<p><b>Response Received from Cardiff Council – Planning Department</b></p>	
<p><b>Brief summary of issues raised:</b></p>	<p><b>Summary of action taken / how this has been covered</b></p>
<p>Acknowledgement of consultation. No further comments provided.</p>	<p>No further action required.</p>

## 2) Consultation Responses from Members of the Public and Community Organisations

### a) Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

<b>Response Received from</b>
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<b>Brief summary of issues raised:</b>	<b>Summary of action taken / how this has been covered</b>
None	

**b) Representations from Community and Other Organisations**

<b>Response Received from</b>	
<b>Brief summary of issues raised:</b>	<b>Summary of action taken / how this has been covered</b>
None	

**c) Representations from Individual Members of the Public**

<b>Response Received from</b>	
<b>Brief summary of issues raised:</b>	<b>Summary of action taken / how this has been covered</b>
None	