GIG CYMRU NHS WALES

Bwrdd Iechyd Prifysgol Aneurin Bevan University Health Board

25th April 2016

NRW Ref: PAN-000061
PHW Ref: A2EO397

Kevin Ashcroft
Permitting Officer
Natural Resources Wales
Wales Permitting Centre (Cardiff)
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Dear Mr Ashcroft

RE: Environmental Permitting (England & Wales) Regulations 2010 Environmental Permit Application: PAN-000061: Hazrem Environmental Limited, Land at Nine Mile Point Industrial Estate, Cwmfelinfach, Caerphilly, NP11 7HZ

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). We welcome the opportunity to comment on this permit application. This assessment is based on actual or potential health risks from environmental hazards associated with the proposed operations including emergencies and extreme environmental events such as flooding. Any recommendations are for consideration by the Regulator and be reflected in any permit conditions made.

Proposed Operations

Waste processing facility to process up to 100,000 tonnes of non-hazardous household, commercial and industrial wastes per annum. The facility is anticipated to accept more than 75 tonnes of waste per day. The waste will be treated to produce either Solid Recovered Fuel (SRF) or Refuse Derived Fuel (RDF) which will be baled and wrapped and exported off site for energy generation. Recyclable materials will be removed during the production of SRF and RDF.

Our assessment of the previously submitted planning application concluded overall that the likely public health impact from the proposed development is low, particularly as the operation will be regulated by Natural Resources Wales, under the Environmental Permitting Regulations and required to demonstrate compliance to requirements of the Permit, ensuring compliance and use of Best Available Techniques (BAT). The planning application was approved on 10th December 2015.

Public health concerns have, however, also been raised by the local community and we have been mindful of these in producing this response. The particular public concerns are:

1. Is the odour and air quality modelling methodology robust taking into account local features?
   a. Has the nature of the valley topography been considered in the dispersion model. If not, is there a reason why not?
   b. Does the meteorological data used effectively represent weather experienced in this valley location?
2. What will be the effect on workers in other premises adjacent in terms of any relevant air quality objectives?
3. What is the nature of the waste to be processed?
   [NB PHW would advise this information is available within the application document and subject to regulation by NRW]
4. Is it possible to confirm that vehicle movements to and from site will not impact upon air quality elsewhere in the valley and road safety?
   [NB PHW would advise that these issues may not be considered under the permitting regime]

Overall conclusion

Having reviewed the Environmental Permit application the current air quality assessment does not appear to take into account any local valley topography and meteorology or the occupiers of nearby commercial buildings. Such considerations could influence the submitted air quality assessment which currently shows that modelled concentrations do not breach Air Quality Objectives.

We would seek reassurance from the Regulator that the air quality assessment reflects local factors so as to provide a measure of reassurance to the local community from site operations.

Public Health Risk Assessment

The operation of a waste processing facility has the potential to cause a number of nuisance issues due to the emission of odour, dust and noise. The applicant has undertaken a noise, odour and air quality assessment and provided relevant plans to mitigate each impact.

The applicant's odour assessment, taking into account abatement plant and based on a number of assumptions, concludes that the overall significance of odour effect is negligible at the worst-case receptor locations.

The applicant's air quality assessment using air dispersion modelling and taking a worst case scenario (assuming gas burner will run continuously at a 100% load) the predicted NO_2 emissions are approximately 3.3% of both the respective short term and long term NO_2 air quality objectives. The modelling results show a maximum increase of 3% in annual NO_2 concentrations at the nearest sensitive receptor. The predicated annual mean NO_2 concentration (comprising measured annual background concentration and proposed development contribution) is approximately 15.4ug/m^3 being 38.5% of the annual air quality objective which is 40ug/m^3

The applicant's noise assessment has considered that noise associated with the operation of the proposed facility would not be significantly detrimental to the noise climate of the area

We would therefore recommend:-

1. Conditions are applied to include
- robust management plans for the control of emissions (dust, odour and noise)
- strict waste acceptance and handling criteria,
- the provision of an accredited environmental management system.

2. The Regulator should be satisfied that initial assessment of odour is suitable and that there will be no discernible odour from on-site activities. This is especially important given the perceived association between odour and ill health.
3. It is not clear from the applicant's air quality assessment that the nature of the local valley topography, meteorology and the occupiers of local business units have been considered with regard to air quality objectives. The Regulator should be satisfied that the dispersion model uses appropriate meteorological data for the site and confirm with the applicant whether the local valley topography is incorporated into the assessment
4. A noise monitoring exercise should be undertaken upon commencement of any operations to confirm the modelled scenario
5. Due to concerns raised by local residents - that NRW liaises with Caerphilly CBC with regard to the latest local air quality data, to identify any potential impacts upon local air quality from on-site emissions and process generated traffic

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

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