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Bwrdd Iechyd Prifysgol
Aneurin Bevan
University Health Board

Our Ref: A2EO397 Direct Line: 01633 435954 11th November 2016

Your Ref: PAN000061

Mr Kevin Ashcroft
Senior Permitting Officer
Evidence, Policy and Permitting Directorate
Natural Resources Wales

Dear Mr Ashcroft

**Environmental Permitting (England and Wales) Regulations 2010
Re: Application for a new bespoke Environmental Permit for Hazrem
Environmental Limited at Nine Mile Point Waste Transfer Facility,
Nine Mile Point Industrial Estate, Cwmfelinfach, Caerphilly, NP11
7HZ**

Public Health Wales was asked by NRW to provide further clarification of what is considered a 'safe' nitrogen dioxide (NO₂) exposure threshold in the context of health and short term emissions from the above proposed development. 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). In response, it is not possible to recommend a 'safe' ambient concentration of NO₂, below which there would be no adverse health effects associated with exposure. Our assessment of risks was influenced by the fact that the predicted contribution of this proposed development on local ambient air pollution concentrations is likely significant.

Bwrdd Iechyd Prifysgol Aneurin Bevan

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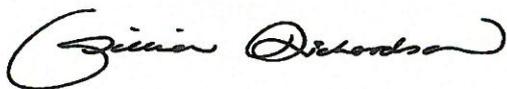


Bwrdd Iechyd Prifysgol Aneurin Bevan yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Aneurin Bevan
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In our previous public health risk assessment, we made reference to the NRW Air Quality Modelling and Risk Assessment Team (AQMRAT) report that considered the effects of the local terrain (including cold air layer inversion formation). The findings, using a worst case scenario, showed a significant increase in the hourly NO₂ process contributions at residential receptors, ranging from 125.9 to 152.6µg/m³ (up to approximately 75% of the hourly Air Quality Objective of 200µg/m³). When taking into account existing ambient concentrations (Predicted Environmental Concentrations; PEC), the hourly NO₂ PECs at residential receptors range from 153.8 to 180.5µg/m³. The maximum short-term PEC equates to approximately 90% of the hourly Air Quality Objective of 200µg/m³. This prompted us to conclude that, while breaches of the statutory Air Quality Objective for NO₂ are not predicted, we remain concerned that the proposed operation would significantly add to the burden of local air pollution, particularly in the short-term.

In addition to the predicted impacts on local air quality, the 2014 Welsh Index of Multiple Deprivation shows that the local area potentially affected by this development is amongst the 20 – 30 % of the most deprived in Wales. The same resource shows that the health of the local population potentially affected is amongst the 10% most deprived in Wales (<http://wimd.wales.gov.uk/lsoa/w01001430?lang=en>). As such, the deterioration in local air quality, coupled with relatively high levels of local area-level deprivation and individual and population vulnerability, led us to previously recommend that the Regulator should exercise caution when considering the environmental permit application. Given the sustainability principles set out in the Well Being of Future Generations (Wales) Act 2015, it is our view that every effort should be made by all Public Bodies to ensure that the environment and public health are protected as a minimum, and improved where possible.

Yours sincerely



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