

: for/Gofynnwch am  
Our Ref/Ein Cyf  
Your Ref/Eich Cyf  
Tel/Ffôn  
Direct Dial/Rbif Union  
Fax/Ffacs  
DX  
E-Mail/E-Bost

Gwyn Jones  
GJ/IML-P/Jun-15

01633 235274

33238 Newport (South Wales)(1)

Kevin Ashcroft

Uwch Swyddog Trwyddedu / Senior Permitting Officer  
Gwasanaeth Trwyddedu / Permitting Service  
Cyfoeth Naturiol Cymru / Natural Resources Wales

Civic Centre/Canolfan Ddinesig  
Newport/Casnewydd  
South Wales/De Cymru  
NP20 4UR



Dear Kevin,

**Application reference: EPR/DP3733BK/V004**  
**Operator: Newport City Council**  
**Facility: Docksway Landfill**

Thank you for your email dated 5<sup>th</sup> June 2015 – in response to our application for a substantial variation to our existing Environmental Permit. We note your comments and queries and present our response to these individually below.

With reference to the fee and the OPRA calculation sheet – please find attached a new OPRA spreadsheet and F1 form. As the Operations Manager of the Docksway Site – I have signed the declaration as the relevant person.

- *No expenditure plan has been provided with the application or if this variation would not change the amount of Financial Provision necessary for this site, no explanation has been provided to justify this.*

We have not submitted an expenditure plan as the proposals sit within our current cost profile for the existing operation. The site budget is set at £2.037 million with the site being wholly owned and operated by Newport City Council; we can submit copies of our budget statements etc. if required. The department under which the landfill site sits has an annual budget in excess of £26m which could be used to cover any environmental emergency actions should this become necessary.

- *Because this is a substantial change to your operations we would expect the closure and aftercare plan to be updated accordingly to take into account the new activities. We have considered the closure and aftercare with reference to the proposed changes to the Environmental Permit. We do not consider that the nature of the proposed changes require the existing details for closure and aftercare of the site to be significantly amended from the existing details that were submitted as part of the original permit application. However the 'SNRHW Construction and Operational Management Plan' provided as part of the variation application is a holistic document that supports the original permit application documents and provides additional details or amendment to specific areas where required. There are details within this document relating to closure and aftercare.*
- *We have received no list of additional waste types to be accepted on site, further to this we are also unsure how much asbestos waste it is proposed to accept on site for disposal. Please clarify. We are adding the following wastes:*

17 CONSTRUCTION AND DEMOLITION  
WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED  
SITES)

17 06	Insulation materials and asbestos-
containing construction materials	
17 06 01*	Insulation materials containing
asbestos	
17 06 05*	Construction materials containing
asbestos	

The annual amount of asbestos waste that it is proposed to accept on site for disposal is 10,000 tonnes.

- *Provide us with more information for Table 2, application form Part C3. Are there any point source emissions to water from the proposed new cell? Yes there is a point source emission to water from the proposed new asbestos cell. Section 3.3 of the 'SNRHW Construction and Operational Management Plan' submitted as part of the variation application describes the proposed surface water management of the SNRHW cell. It is proposed to extract water from within the cell by pumping, and pass the extracted water through a sand filter before being sampled for laboratory testing, then discharged to a holding lagoon where the water will then be pumped to the Area 2 surface water system and discharged under existing discharge consent (AN0401301).*
- *Provide us with more information for Table 3, application form Part C3. Operating techniques specific to landfill have not been listed. Please provide details. The 'SNRHW Construction and Operational Management Plan' submitted as part of the variation application describes the operating techniques specific to the proposed changes. See Sections 5 (SNRHW Acceptance Procedures), 6 (SNRHW Cell Operational Procedures) and 7 (Environmental Monitoring) of the Plan.*
- *There has been no updated Environmental Risk Assessment provided nor has there been a Nuisance, Health and Amenity Risk Assessment. Please refer to our H1 Risk Assessment Guidance for further guidance. <https://www.gov.uk/government/publications/h1-environmental-risk-assessment-for-permits-overview> The Environmental Risk Assessment has been updated with reference to Annex I and J – and the reviewed/updated documents submitted with the variation application include the ESID note, the HRA, the Landfill Gas Risk Assessment and the Stability Risk Assessment. Further information is also included in the 'SNRHW Construction and Operational Management Plan'. With reference to Nuisance, Health and Amenity Risk Assessments – these were carried out as part of the original permit application and it is considered that these remain valid, with additional measures provided within the 'SNRHW Construction and Operational Management Plan', where required.*

We trust that this is sufficient information to resolve the queries, but please don't hesitate to contact us should you have any further questions.

In addition, we would like to submit an amended 'SNRHW Construction and Operational Management Plan' in support of the variation application. There was an omission in Section 7 (Environmental Monitoring) with reference to air quality monitoring during operations – and this has now been included.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gwyn Jones', with a large, sweeping flourish at the end.

Gwyn Jones  
Waste Disposal Site Manager  
Docksway Disposal Site

**Contact Address:**

Newport City Council  
Streetscene and City Centre Services,  
Civic Centre,  
Newport,  
NP20 4UR

