Cyfoeth Naturiol Cymru
Natural Resources Wales

Mr Huw Brunt
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Cardiff
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Our ref: PAN-000061
Appeal ref: 3172985

Date: 25th May 2017

Dear Huw,

The Environmental Permitting (England and Wales) Regulations 2016
Appeal 3172985 : Hazrem Environmental Limited
Site: Nine Mile Point Industrial estate, Cwmfelinfach, Caerphilly, NP11 7HZ

On 10th May 2017,NRW notified you that Hazrem Environmental Ltd (HEL) have submitted an appeal to the Welsh Ministers against our decision to refuse to grant a permit to carry out waste treatment activities at Nine Mile Point Waste Transfer Facility, Nine Mile Point Industrial Estate, Cwmfelinfach, Caerphilly, NP11 7HZ.

In your letter (reference A2EO397) dated 19th September 2016, you recommended that any additional information obtained by the regulator should be sent to Public Health Wales for consideration. Consequently we can now provide new modelling results which have been produced following receipt of a manufacturer's specification provided as part of HEL's appeal.

The following information is taken from a supplement to NRW's report C177 RP02 detailing the results of a re-assessment of the impact of NO_2 from the proposed development at a revised emission limit value of 80 $mg.Nm^{-3}$ as proposed by the Appellant.

Impacts at twenty-three discrete receptors were modelled for two scenarios representing minimum and maximum operating load conditions. The results provided in the tables below are for the receptors where the impact is predicted to be the greatest. Results for all other receptors are predicted to be lower.

All details pertaining to the proposed operation, location, influence of topography and microclimate remain the same as those specified in sections 1.1 to 1.4 of report C177_RP02 provided 22nd August 2016. Our modelling assessment is based on the assumption that, for each scenario, the regenerative thermal oxidiser is operating continuously over the entire year at the associated emission rates of NO_x/NO_2.

Table 1 Maximum Process Contributions @ 80 mg/NM^3

Process Contributions Normal Operating load (15 tonnes/hr, 30% Moisture Content) [1]		
Duffryn Road, Brynawel	**PC**	**PC % of AQO**
Short Term Hourly maximum (99.79 percentile) PC	28.6 - 34.7 µg.m-^{3}	17%
Long Term PC	1.3 – 1.8 µg.m-^{3}	5%
Process Contributions Maximum Operating load (17.5 tonnes/hr 50% moisture content)		
Duffryn Road, Brynawel	**PC**	**PC % of AQO**
Short Term Hourly maximum (99.79 percentile) PC	52.9 – 64.1 µg.m-^{3}	32%
Long Term PC	2.4 – 3.3 µg.m-^{3}	8%

Table 2 Maximum Hourly NO2 Predicted Environmental Concentration @80 mg/M^3

Predicted Environmental Concentration (PEC) maximum Operating load (17.5 tonnes/hr 50% moisture content)				
Duffryn Road, Brynawel	**PEC**	**PEC % of AQO**	**Corresponding PC**	**Corresponding PC% of AQO**
Short Term Hourly maximum (99.79 percentile) PEC	80.8 – 92 µg.m-^{3}	46%	52.9 – 64.1 µg.m-^{3}	32%

Table 3 Maximum Predicted Environmental Concentration @ 80 mg/m^3

Predicted Environmental Concentration (PEC) Normal Operating Load (15 tonnes/hr, 30% Moisture Content)				
Islwyn Road, Wattsville	**PEC**	**PEC % of AQO**	**Corresponding PC**	**Corresponding PC% of AQO**
Short Term Hourly maximum (99.79 percentile) PEC	74.7 µg.m-^{3}	37%	0.4 µg.m-^{3}	<1%
Long term PEC	37.2 µg.m-^{3}	93%	<0.1 µg.m-^{3}	<1%
Predicted Environmental Concentration (PEC) maximum Operating load (17.5 tonnes/hr 50% moisture content)				
Islwyn Road, Wattsville	**PEC**	**PEC % of AQO**	**Corresponding PC**	**Corresponding PC% of AQO**
Long term PEC	37.3 µg.m-^{3}	93%	0.16 µg.m-^{3}	<1%

[1] Reported figures in all tables represent the results of the maximum predicted impact only.

We note that in your letter dated 11th of November 2016, you advised "…that the predicted contribution of this proposed development on local air pollution contributions is likely significant".

We would welcome any further comments you wish to make in light of the revised assessment and figures set out above, in particular whether you remain of the view that the predicted contribution of this proposed development on local air pollution contributions is "*likely significant*" and whether there are likely to be any health impacts from NO_2 emissions at these predicted levels.

We also include a copy of the report produced by our Air Quality Modelling and Risk Assessment Team (AQMRAT) Report number C249-WD01 for your consideration.

We would be grateful if you could provide your comments by 9th June 2017 in order to meet the timescales of the appeal

You can email kevin.ashcroft@naturalresourceswales.gov.uk or write to me at Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff, CF24 0TP.

If you have any questions about this letter please phone me on 03000 654207 or email me at the address above.

Yours sincerely

Kevin Ashcroft
Senior Permitting Officer

CC Dr Gillian Richardson - Aneurin Bevan Health Board
Kristian James – Public Health Wales

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