

Dr Sarah Aitken
Director of Public Health
Aneurin Bevan Health Board
St Cadoc's Health Board
Lodge Road
Caerleon
Newport
NP18 3XQ

Our ref: PAN-000061

Appeal ref: 3172985

Date: 11th July 2017

Dear Dr Aitken,

**Re: Environmental Permitting (England and Wales) Regulations 2016
Appeal; Hazrem Environmental Ltd, Nine Mile Point Ind. Est, Cwmfelinfach,
Caerphilly, NP11 7HZ**

Thank you for your letter of 9th June 2017 in which you provided comments on revised air quality modelling work carried out by NRW.

As you will be aware, during determination of the permit application there was concern that the proposed emission limit (300 mg/Nm³) was greater than would normally be expected for combustion units of this size. The applicants consultants informed NRW in August 2016 that the emission limit was conservative and that the facility should realistically achieve much lower emissions than previously submitted. However, as they were unable to provide satisfactory evidence to NRW, we were unable to verify the revised figures and based our air quality assessment on those figures originally submitted.

As part of their appeal statement the appellant submitted a technical data sheet prepared by the manufacturer Andritz Separation, which shows NO_x emissions substantially less than previously submitted. This also helpfully provides a performance guarantee that NO_x emissions will not exceed 65 Mg/Nm³. Manufacturers specifications are based on robust testing, therefore, NRW have no reason to doubt the information provided and can confirm that if this specification was submitted in support of a new application, it would be accepted by NRW. As such, it is unfortunate that the appellant failed to provide this information during the determination period. Nevertheless, NRW are now satisfied that the revised emission limits more accurately reflect the process emissions.

We trust this provides you with the clarity you have sought in relation to how the new emission limit was derived and why it is deemed more realistic.

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We note your point in relation to uncertainty in the model being cause for concern, however in the absence of actual monitoring data, modelling is the most suitable tool to predict the impacts. In the event that the Inspector is minded to uphold the appeal and direct that a permit be granted, then NRW would seek to ensure that a suitably robust programme of monitoring was a condition of the permit so as to verify and ensure compliance with emission limits.

We trust this clarifies the position but please feel free to contact us should you require any further information.

Yours sincerely

Kevin Ashcroft
Senior Permitting Officer

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