

31 January 2022

Kate Thomas  
Natural Resources Wales  
By Email Only

Our Ref: 416.00798.00038

Your Ref: PAN-013001

Dear Kate,

**RE: POWYS COUNTY COUNCIL – ENVIRONMENTAL PERMIT APPLICATION, 2<sup>ND</sup> SCHEDULE 5 RESPONSE AND 3<sup>RD</sup> SCHEDULE 5 RESPONSE**

We are writing on behalf of Powys County Council (PCC) in response to the request for further information for the Schedule 5 Notice No 2 issued 1<sup>st</sup> October 2021 and the Schedule 5 Notice No 3 issued on 14<sup>th</sup> January 2022, in support of the Environmental Permit (EP) application for the North Powys Bulking Facility, Abermule.

For clarity, the questions from Natural Resources Wales (NRW) are listed in the left-hand column with the responses from SLR in the right-hand column.

Yours sincerely  
**SLR Consulting Limited**



**Samantha Pople**  
Principal Consultant

Cc Debbie Palfrey – WRAP Cymru  
Ashley Collins – Powys County Council

Enclosures:

Enclosure 1	Fire Prevention and Management Plan
Enclosure 2	EMS.S8.04 – Maintenance checklist
Enclosure 3	EMS.S4.01 – Operating Techniques Document
Enclosure 4	Odour Management Plan
Enclosure 5	Dust and Emissions Management Plan
Enclosure 6	Pest Management Plan
Enclosure 7	Email Correspondence Between PCC and Severn Trent Water
Enclosure 8	Drawing 002 – Site Layout Plan
Enclosure 9	EMS.S6.01 – Accident Management Plan
Enclosure 10	Abermule EMS.S2.06 – Complaints Procedure

# SCHEDULE 5 NO 2 OUTSTANDING INFORMATION

## 1. FIRE PREVENTION AND MITIGATION PLAN (FPMP) FIRE PREVENTION AND MITIGATION PLAN (FPMP)

### 1.3 Common Causes of fire and preventative measures

Reference Number	Detail	Response to Question
<b>The updated FPMP is included as Enclosure 1.</b>		
1.3.1	<p><i>Arson or vandalism</i></p> <p><i>Preventative measures include:</i></p> <ul style="list-style-type: none"> <li>- Full recorded CCTV; and</li> <li>- Intruder alarms in the office and welfare building,</li> </ul> <p>However, it is not clear what procedures are in place to monitor the CCTV and what action will be taken should something be identified. It has also been noted that an intruder alarm is not in place on the waste storage building.</p> <p>Arrangements for outside operational hours must be considered further for both the outside area of the stie and for the waste transfer building.</p> <p><b>Action: Revise the FPMP to provide this information.</b></p> <p>NRW Comments: Revised FPMP states that the CCTV can be viewed at any time, both inside and outside of operational hours, and is available to view remotely. However, “procedures in place to monitor the CCTV” have not been included. It is not clear who will monitor the CCTV especially outside of operational hours. Note that the request specifically included “Arrangements for outside operational hours must be considered further for both the outside area of the site and for the waste transfer building”. This point is outstanding.</p>	<p>Table 2-3 (Arson and Vandalism) of the FPMP has been updated to detail the procedures in place to monitor CCTV and who will monitor the CCTV outside of operational hours. If an intruder or fire alarm is triggered an alert will be sent to the management centre (Delta). During operational hours, Delta will contact the site directly to ensure they are aware of the incident. This will prompt CCTV to be monitored by on site staff. Outside of operational hours, Delta will contact the site and the PCC out of hours line which is connected to the relevant Duty Officer for that shift. The Duty Officer has remote access to the CCTV footage and will monitor the CCTV footage at the time of the incident.</p> <p>If required, the emergency services will be contacted immediately.</p> <p>The CCTV footage will provide full coverage of all external areas of the site and the waste transfer building.</p>

Reference Number	Detail	Response to Question
1.3.4	<p><i>Plant or equipment failure</i></p> <p>Table 2-3 states that “All mobile and fixed plant servicing and maintenance is carried out as per the manufacturer’s instructions”. However, there should be a maintenance and inspection programme in place.</p> <p><b>Action: Provide this information/document.</b></p> <p>NRW Comments: “EMS.S8.02 Maintenance procedure” has been provided and this document refers to “EMS.S8.04 – Maintenance checklist”, however this document is blank and does not include the equipment or infrastructure (i.e., penstock valve, impermeable surface etc) that will be maintained. This point is outstanding.</p>	<p>“EMS.S8.04 – Maintenance checklist” has been updated to ensure that it is no longer blank. It is included as Enclosure 2. Infrastructure is maintained centrally by PCC’s Property Department and is part of standard inspections for council assets. There is also a checklist for a general daily site walkover which details inspection of items like drains and the condition of roads etc. Therefore, a list of infrastructure has not been included here.</p>

## 1.9 Seasonality and Waste Stack Management

Reference Number	Detail	Response to Question
1.9.1	<p>In accordance with the guidance, you should demonstrate that your waste stack management is viable and that you are able to prove the suitability of materials, the resilience of the supply chain and end users.</p> <p>The FPMP includes contracts in place for some waste streams, however there is no information for several of the waste streams and their end user outlets. This includes:</p> <ul style="list-style-type: none"> <li>- Non-recyclable residuals,</li> <li>- Bulky waste,</li> <li>- Textiles,</li> <li>- Small WEEE,</li> <li>- Non-hazardous batteries,</li> <li>- Street cleaning residues,</li> <li>- Composite packaging, and</li> <li>- Green waste.</li> </ul>	<p>Section 2.4.4 of the FPMP has been updated to include that the end user outlets for small WEEE and non-hazardous batteries will be the local HWRC where they will be collected from. The current contracts are as follows:</p> <ul style="list-style-type: none"> <li>• Small WEEE: ERP UK Ltd. Small Domestic Appliances (SDA) to S Norton &amp; Co; and</li> <li>• Non-hazardous batteries: HJ Enthoven.</li> </ul>

Reference Number	Detail	Response to Question
	<p><b>ACTION: Revise FPMP to include contracts in place for end user outlets for each waste stream to be accepted on site.</b></p> <p>NRW comments: The revised FPMP does not include end user outlets for small WEEE and non-hazardous batteries. This point remains outstanding.</p> <p>It has been noted that the section 2.2.4 of the FPMP states “Textiles, and AHPs are not currently collected. However, PCC are currently working with the Welsh Government to set up collections for these waste streams. With changes to the blueprint method of collections, textiles may be collected as part of the kerbside collection scheme in the future. When the infrastructure is in place to do so, PCC will introduce a separate collection of AHPs from the kerbside”.</p>	
1.9.4	<p>In accordance with the guidance, if the materials on your site are subject to seasonal variation in demand and/or supply you should demonstrate how you intend to manage these variations.</p> <p>You should be able to demonstrate how you will follow the principle of “first in, first out” so that wastes are stored for no longer periods than indicated in Table 1.</p> <p>Section 2.4.4 of the FPMP states: Material volumes and supply and demand of material on site are subject to seasonal variation at Christmas and during summer months. Procedures to monitor the variations are included within the EMS.</p> <p>This information is not included in the Operating Techniques document or the EMS summary submitted.</p> <p><b>Action: Revise the FPMP to provide this information.</b></p> <p>NRW comments: Your Schedule 5 response documents states: Section 2.5 includes how the site will follow the principle of “first in, first out” so that wastes are stored for no longer periods than indicated in Table 2-1.</p> <p>Section 3.5 of the OT has been updated to include this information.</p> <p>However, Section 3.5 of the OT states:</p>	<p>Section 3.5 of the EMS has been updated to include procedures to monitor seasonal variations in material supply and demand on site. The updated EMS is included as Enclosure 3.</p>



Reference Number	Detail	Response to Question
	<p>Material volumes and supply and demand of material on site are subject to seasonal variation at Christmas and during summer months. Procedures to monitor the variations are included within the EMS.</p> <p>You have not provided “Procedures to monitor the variations”, therefore this point is outstanding.</p>	

### 1.13 Water Supplies

Reference Number	Detail	Response to Question
1.13.3	<p>If you propose to use water from the hydrant you must provide evidence that you have permission to access this water.</p> <p><b>Action: Revise the FPMP to provide this information.</b></p> <p>NRW Comments: Your Schedule 5 response document states:  “Section 3.6.2 has been updated to explain that the FRS have permission to access water from the fire hydrant”.</p> <p>The notice requires you to provide evidence that you have permission to access this water, not the FRS. You have not provided evidence that you have permission to access this water and this point is outstanding.</p> <p>In accordance with Section 20 of the guidance:  You must ensure that you have permission to use any water supplies that you have stated within your plan and necessary evidence of this solution is required.</p> <p>This point remains outstanding.</p>	<p><b>Please refer to the response to Question 1.1.</b></p> <p>Whilst access is assumed under the Water Act 1989, evidence that officially illustrates that PCC have permission to access water from the fire hydrants is currently being requested by PCC from Severn Trent Water.</p>

## 1.14 Managing fire water run-off

Reference Number	Detail	Response to Question
1.14.2	<p>Section 3.6.1 of the FPMP states:                      All surface water collected from the building roofs and from the external yard area passes through a class one full retention oil interceptor before entering one of two soakaways on site.</p> <p><b>Action: Revise the FPMP to provide this explain what prevents fire water run-off from going to these soakaways.</b></p> <p>NRW Comments: Section 3.6.1 of the revised FPMP states:  <i>All surface water collected from the building roofs and from the external yard area passes through a class one full retention oil interceptor before entering one of two soakaways on site.</i></p> <p><i>Penstock valves, as described in Section 3.6.3 below prevent the release of firewater run-off from going to the soakaways.</i></p> <p>Given that the soakaway areas are within the impermeable areas of the site, it is not clear how fire water run-off will be prevented from draining off of the impermeable surface directly onto the soakaway. Is the soakaway area bunded to prevent this from happening? Is it under the impermeable surface and water accesses it through designated drainage pipes/via penstock valve as opposed to runs-off into these areas?</p> <p>It has been noted that Drawing 003 does not show any kerbing or firewater containment walls around the two soakaway areas.</p> <p>This point remains outstanding.</p>	<p>The soakaways are constructed <b>underneath (below ground)</b> the impermeable surfacing – they are not constructed above ground. Therefore, the soakaway systems have their own designated drainage pipework, where under normal operating conditions clean surface water flows to.</p> <p>Please refer to Sections 3.6.1 and Section 3.6.3 which already details how the penstock valve operates during a fire event.</p> <p>This information is copied below for ease;                      Section 3.6.1 - All surface water collected from the building roofs and from the external yard area passes through a class one full retention oil interceptor before entering one of two soakaways on site. Penstock valves, as described in Section 3.6.3 below prevent the release of firewater run off from going to the soakaways.</p> <p>Section 3.6.3 - In the event of a fire, all penstock valves will be closed prior to the commencement of firefighting activities to prevent the release of firewater outside the site through the surface or foul water drainage systems. The penstock valves are closed automatically when the fire alarm is activated without the need to be on site or remote operations, therefore, allowing penstock valves to be closed outside of operational hours.</p> <p>As the soakaways are below ground, it would be inappropriate and unnecessary for containment walls and kerbing to be constructed, above ground, around these areas. This SUDS drainage scheme was</p>

Reference Number	Detail	Response to Question
		<p>approved under the current planning permission. The whole site benefits from kerbing throughout, which is clearly shown on Drawing 003 in bold black dashed lines. All runoff flows to the southern area of the site, which as discussed previously, benefits from a firewater containment wall.</p> <p>It should also be noted that there are surface water drainage inspection chambers included in the soakaway design. These are already illustrated on Drawing 003.</p>

## 2B. ODOUR MANAGEMENT PLAN (OMP)

Reference Number	Detail	Response to Question
2.10	<p><b>ACTION: Include the waste material types, storage time and amount in tonnes.</b></p> <p>NRW Comments: Schedule 5 response states that information is provided in Appendix AQ1, however this document does not include storage time. This point remains outstanding.</p>	<p>Appendix AQ1 of the OMP has been updated to include waste storage times. The updated OMP is included as Enclosure 4.</p>

## 3. DUST AND EMISSIONS MANAGEMENT PLAN (DEMP)

Reference Number	Detail	Response to Question
3.8	<p>Table 3-4 states:  <i>A consistent, regular housekeeping regime is in place to ensure Site is regularly checked and issues remedied to prevent and remove dust and particulate build up.</i></p> <p><b>ACTION: Revise the DEMP to provide the housekeeping regime including method, frequency etc.</b></p> <p>NRW Comments:</p>	<p>Table 3-4 of the DEMP has been updated to include that all roads and operational areas are checked on a daily basis and swept daily, as necessary, in line with the daily inspections. The updated DEMP is included as Enclosure 5.</p>



Reference Number	Detail	Response to Question
	<p>Table 3-4 states: All roads and operational areas are swept where necessary to reduce dust emissions.</p> <p>Still not specific as to when this will be done.</p>	

## 5. OPERATING TECHNIQUES

Reference Number	Detail	Response to Question
5.4	<p><i>All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.</i></p> <p><i>The relevant procedures are contained in Section 8 of the EMS.</i></p> <p><b>ACTION: Provide this document.</b></p> <p>NRW comments: Schedule 5 response states that Section 8 of the EMS has been included in Enclosure 08. Whilst this section includes document “EMS. S8.02 Maintenance procedure”, it also includes EMS. “S8.04 Maintenance checklist”. However, this document is blank and therefore it is unclear how site operatives would know when equipment requires servicing. This document should be completed and consider plant and infrastructure, in accordance with How to Comply.</p> <p>This point is outstanding.</p>	<p>EMS S8.04 Maintenance Checklist has been updated and is no longer blank. It has been included as Enclosure 2.</p>

## 6. PEST MANAGEMENT PLAN (PMP)

Reference Number	Detail	Response to Question
6.3	<p>Table 3-1 states:  <i>To minimise the potential for infestations, food waste will arrive on site in RRV pods/stillages or trade waste vehicles and will be tipped directly into a designated food waste bay. A full wash down of the food waste bay will be undertaken at least weekly during off-peak periods to minimise disruption to material deliveries.</i></p> <p><b>Action: Revise PMP to explain the following:</b></p> <ul style="list-style-type: none"> <li>- <b>Procedures used to ensure that the bay is completely empty to enable this to be carried out.</b></li> <li>- <b>Procedures used during peak periods.</b></li> <li>- <b>What constitutes peak and off peak.</b></li> </ul> <p>NRW Comments. In your response you have not provided:</p> <ul style="list-style-type: none"> <li>- Procedures used during peak periods.</li> <li>- What constitutes peak and off peak.</li> </ul>	<p>Table 3-1 of the PMP has been updated to include that during peak periods, lorries tip their load directly into the bay and material is pushed to the back of the bay using the loading shovel. It has also been clarified that peak hours are considered to be when vehicles are tipping collected material on site. This is usually between 12.30pm and 3.30pm. Off-peak hours relate to the times outside of the tipping hours, where lorries are not tipping into the bay. The updated PMP is included as Enclosure 6.</p>

# SCHEDULE 5 NO 3

## 1. FIRE PREVENTION AND MITIGATION PLAN

Reference Number	Detail	Response to Question
1.1	<p>Section 3.6.2 of the revised FPMP states:                      “The fire hydrant has a flow rate of 7750 l/minute and is therefore able to provide a sufficient supply of water”, however evidence to demonstrate this has not been provided.                      7750 x 180 = 1,395,000 litres over a 3 hour period.                      Mid and West Wales Fire and Rescue Service have provided the following comments:</p>	<p>An administrative error was made regarding the flow rate of the hydrant provided in the previous Schedule 5 Response. We do apologise for this.                      PCC can confirm that there is not a fire hydrant that supplies 7750 litres per minute (l/min).</p>



Reference Number	Detail	Response to Question
	<p><i>This is a staggering amount of water from a single hydrant. Could the operator provide documentation from the water provider that this is correct.</i></p> <p>In addition to this, such a huge volume of water being supplied via the hydrant may impact the water supply to the local community. This risk should also be considered in the FPMP.</p> <p>In accordance with Section 20 of the FPMP guidance:        You should contact your respective water supplier to establish water access, available water pressures to your site to ensure that water supplies are available without impacting on the local community.</p>	<p>Due to the timeframe given for responding to this Schedule 5 notice (2 weeks), there has not been enough time given for Severn Trent to establish these water pressures. Therefore, PCC have undertaken their own testing of the flow rates at each of the 3 fire hydrants on site.</p> <p>The actual flow rates of the 3 hydrants, and how they were tested, which could potentially be used are as follows;</p> <ul style="list-style-type: none"> <li>• The first hydrant which is located on the site itself provided <u>437l/min</u> which was measured by 400mm depth of water in a 1000l container which measured 1150mm long by 950mm wide.</li> <li>• The second hydrant which is located on the entrance to the Business Park provided <u>382l/min</u> which was measured by 350mm depth of water in the same tank.</li> <li>• The third hydrant which is straight off the 14inch district main provided us with <u>710l/min</u> which was measured by 650mm depth of water, again in the same tank.</li> </ul> <p><b>Total flow rate on site – 1,529l/min.</b></p> <p>The combination of the 3 hydrants provides sufficient water to put out the largest stockpile (249m<sup>3</sup> stockpile requires a minimum of 1,390 litres/minute).</p>

Reference Number	Detail	Response to Question
		<p>PCC have been in discussions with Severn Trent around the flow rate of the hydrants. They have confirmed, via email and included in Enclosure 7, that they aim to provide 8 litres/second (480 l/min) but there is no guarantee on this figure.</p> <p>PCC are currently waiting for Severn Trent to attend site and to also confirm in writing that they will have access to the fire hydrants in the event of a fire.</p> <p>As the flow rate is not as high as previously stated (7750l/min) there will be no impact on local water supplies.</p>
1.2	<p>Section 3.6.2 Firewater Calculations states:  <i>Based upon the FPMP guidance firewater calculations a 300m<sup>3</sup> stack of combustible material will require an average water supply of at least 2,000 litres a minute for a minimum of 3 hours. This equates to approximately 360m<sup>3</sup> of water. Based on this calculation and the largest stockpile within each area of the site, the water requirements are as follows:</i></p> <ul style="list-style-type: none"> <li>- <i>Bulking Shed: 249,642 litres (249m<sup>3</sup>); and</i></li> <li>- <i>External Storage Bay (Green Waste): 184,000 litres (184m<sup>3</sup>).</i></li> </ul> <p>Section 3.6.3 states:  <i>Figure 3-1 illustrates the containment capacity of the site. The volume of water shown is 259,000 litres (259m<sup>3</sup>), therefore the site is capable of containing the worst-case firewater requirements calculated in Section 3.5.2 above.</i></p> <p><b>IMPORTANT:</b> If you submit evidence that the fire hydrant has a flow rate of 7750 l/minute, you must revise your FPMP to consider how this increase in the amount of water would be contained, given that your FPMP currently considers containing 259,000 litres. Given the staggering amount of water that the hydrant could produce your FPMP needs to be updated to reflect how this would be contained without overwhelming the containment.</p>	<p>As detailed in the response to Question 1.1, there was an error in the response regarding the flow rate, therefore this question is no longer applicable.</p>

Reference Number	Detail	Response to Question
1.3	<p>The revised FPMP includes information on the quarantine areas and how these areas will be utilised. The use of the quarantine areas during an incident are decided upon by the FRS and the statements about the use of these should not be relied upon in the FPMP. Mid and West Wales Fire and Rescue Service have provided the following comments and the FPMP must be revised to consider these comments:</p> <p><i>Page 32 – Table 3.1 - Quarantine Area Discussions</i></p> <p><i>The table states ‘FRS to submerge burning material into a skip of water’. The decision for firefighting tactics is firmly with the Officer in Charge of the incident at that time. The decision to use a skip is one of the options available, there is no guarantee that tactic will be used.</i></p> <p><i>Page 32 – The penultimate paragraph states ‘Following discussions between PCC and the local FRS it was agreed that the non- conforming waste quarantine area would not be used for the dousing of burning waste’. Again, the decision for firefighting tactics lies with the Officer in charge of the incident and there may be a need to remove burning waste to this area. Within any quarantine area the containment of firefighting water run-off is of paramount importance and this needs to be considered.</i></p> <p><i>Page 32 – Quarantine Area – The safest way to safely extinguish a waste fire is to take the burning material to a safe location and spread it out and then apply an extinguishing medium. Water will only penetrate a certain depth into a large pile of waste and therefore, if the fire is deep seated then it will continue to burn for an extended duration. A quarantine area is designed for this purpose, the FRS has concerns that contaminated water may not be contained.</i></p> <p>The above indicates that you cannot rule out any uses for quarantine area and the FRS may decide on the day to use it to douse waste.</p> <p>Therefore, your FPMP should not explicitly rule out any options for its use.</p>	<p>Section 3.8.2 of the FPMP has been updated to explain that the non-conforming waste quarantine area will only be used to store non-conforming waste and will not be used for fire management. The temporary fire management quarantine area located in front of the building will be used for fire management purposes. This area will be suitable for the FRS to remove burning waste from the bulking shed and submerge it into a skip of water and/or douse burning/smouldering waste and/or separate unburnt waste. It has been acknowledged in the updated FPMP that the decision for firefighting tactics and the use of the temporary fire management quarantine area is at the discretion of the FRS. The updated FPMP is included as Enclosure 1.</p>

Reference Number	Detail	Response to Question
1.4	The FPMP has been revised to include two quarantine areas - dedicated temporary fire management quarantine area and a non- conforming waste quarantine area, however these have not been clearly labelled on the site layout plan (drawing 002).	The site layout plan (Drawing 002) has been updated to clearly label the temporary fire management quarantine area and the non-conforming waste quarantine area. The updated site layout plan (Drawing 002) is included as Enclosure 8.

## 2. ODOUR IMPACT ASSESSMENT (OIA) AND ODOUR MANAGEMENT (OMP)

Reference Number	Detail	Response to Question
2.1	<p>In the odour impact assessment, you have used the storage time of 24 hours for food waste to justify the odour emission rate. Appendix E: Justification of Odour Emission Rates includes states:</p> <p><i>“Food waste has a very high organic content and therefore there is the potential for odour emissions from this waste type to increase over time as the organic material decomposes (and putrefaction may occur). However, in consideration that the retention time would be just 24-hours (in line with the Waste Sector Best Available Techniques Reference Document<sup>15</sup>), it is not anticipated that significant levels of decomposition or putrefaction would occur during this short retention period.”</i></p> <p>However, this storage time of 24 hours for food waste is not consistent within your other management plans. This includes:</p> <ul style="list-style-type: none"> <li>-Table 2-1 of the FPMP (Final V2) states that food waste will be stored for <b>4 days</b>.</li> <li>-Section 2.4 of the OMP (Final V2) states:</li> </ul> <p><i>“Under normal operational conditions material delivered to the Site is stored for a maximum of <b>5 days</b> prior to removal”.</i></p> <ul style="list-style-type: none"> <li>-Section 3.3 Material Storage and Transfer Control of the OMP states:</li> </ul> <p><i>“Material is stored on site for no longer than <b>5 days</b> (with the exception of AHPs, which may be stored for a maximum of 7 days within a suitably sealed container); and are stored in the relevant designated bays”, and.</i></p>	<p>Table 2-1 of the FPMP, Section 2.4 of the OMP, Section 3.3 of the OMP, and Figure 2 of 3.5 of the OT have been updated to reflect that under normal operating conditions and based on the contractual agreement for this waste stream with PCC’s haulier, food waste will be stored on site for 24 hours. The updated FPMP is included as Enclosure 1, the updated OMP is included as Enclosure 4 and the updated OT is included as Enclosure 3.</p>

Reference Number	Detail	Response to Question
	<p>-Figure 2 of 3.5 of Operating techniques states:  <i>“Maximum storage time for food as <b>4 days</b>”.</i></p>	
<p>2.2</p>	<p>In Section 3.8.3 of the previous OMP (Final V1) it stated that the site will monitor the meteorological conditions on-site, and either an on- site weather station or online resource will be used, Schedule 5 Notice #2 (issued 01 October '21) requested you to clarify as to which option will be utilised on-site.</p> <p>The revised OMP (Final V2) states in Section 3.8.3: <i>“The Site Supervisor or other designated responsible person records daily weather conditions in the Site Diary, sourced from online weather data channels. The nearest meteorological recording station is the Lake Vyrnwy No. 2 recording station, located approximately 28km northwest of the Site.”</i></p> <p>This meteorological station is a considerable distance from the site, located within significantly different terrain; therefore, recorded weather information from this station may not be representative of the local weather conditions at the site. It therefore may not be appropriate for this online resource to be used as stated in the OMP and another method to monitor and record this information should be sought.</p> <p>Furthermore, the odour impact assessment states: <i>“There are a number of meteorological stations surrounding the Site (Lake Vyrnwy, Shobdon Airfield, Bala, Shawbury and Trawsgoed) however these stations are all a considerable distance from the Site and have significantly differing characteristics such as elevation and surrounding land use.”</i> You have not included a justification on why the use of online weather data is appropriate for the OMP but not for the OIA.</p>	<p>Section 3.8.3 of the OMP has been updated to include that PCC will install a weather station on site prior to the commencement of onsite operations because it is acknowledged that the nearest meteorological recording stations are located a considerable distance from the site and have significantly differing characteristics. The Site Supervisor or other designated responsible person will record daily weather conditions in the Site Diary, sourced from the onsite weather station. The updated OMP is included as Enclosure 9.</p>

### 3. ACCIDENT MANAGEMENT PLAN

Reference Number	Detail	Response to Question
3.1	<p>The accident management plan submitted states:</p> <p><i>“In the event that unauthorised waste is delivered to the site, the waste will be either</i></p> <ul style="list-style-type: none"> <li>• <i>Deposited within the residual waste pile; or</i></li> <li>• <i>Handpicked in the existing bay.</i></li> </ul> <p><i>If unable to be reprocessed, the non-conforming waste will be segregated and stored in a designated quarantine area until removed from site to a suitably authorised facility”.</i></p> <p>The above statement is ambiguous and could be interpreted that unauthorised waste is identified and then deposited into the residual waste.</p>	<p>The accident management plan has been updated to clarify the procedures if unauthorised waste is delivered to the site in line with the OT. The updated document EMS.S6.01 – Accident Management Plan is included as Enclosure 9.</p>

### 4. COMPLAINT'S PROCEDURE

Reference Number	Detail	Response to Question
4.1	<p>Document Abermule EMS.S2.06 Complaints Procedure has been submitted in response to point 5.20 of the Schedule 5 Notice #2 (issued 01 October '21). This document states:</p> <p><i>7. The Site Manager to make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, the Environment Agency will need to be contacted on 0800 807060 as soon as possible. The severity of the incident will be determined by the Site Manager.</i></p> <p>The reference to the “Environment Agency” should be corrected to “Natural Resources Wales” with the correct contact number.</p>	<p>Abermule EMS.S2.06 – Complaints Procedure has been updated to correct the reference to the “Environment Agency” to “Natural Resources Wales” with the correct phone number. The updated Abermule EMS.S2.06 – Complaints Procedure is included as Enclosure 10.</p>

## 5. FOOD WASTE

Reference Number	Detail	Response to Question
5.1	<p>Table 3-1 of the Pest management plan (document reference Pest Management Plan Final v2 – submitted 11 November '21) states the following:</p> <p><i>“Food waste:                      To minimise the potential for infestations, food waste will arrive on site in RRV pods/stillages or council vehicles and will be tipped directly into a designated food waste bay. Food waste is collected from the site daily typically before 11am, with the haulage arranged to ensure that all material is cleared from the bay completely on each collection. This will allow the bay to be hosed down after each load is taken, during the off-peak period, before the next load is tipped in the afternoon. A full wash down and deep clean of the food waste bay will be undertaken at least weekly during off-peak periods to minimise disruption to material deliveries”.</i></p> <p>This information is not included in your other management plans.</p>	<p>The OT and OMP have been updated to include that food waste will arrive on site in RRV pods/stillages or council vehicles and will be tipped directly into a designated food waste bay. The updated OT is included as Enclosure 3 and the updated OMP is included as Enclosure 9.</p>