

Ahlim Hashm

From: Llewellyn, Matthew <Matthew.Llewellyn@cyfoethnaturiolcymru.gov.uk>
Sent: 07 December 2018 15:42
To: Ahlim Hashm
Cc: Willey, David; Bowder, Alex
Subject: RE: [EXT] RE: removing groundwater monitoring requirement from the permit

Ahlim,

I have now had a chance to run through the groundwater summary note you submitted ('Recommendations Groundwater Monitoring and Compliance (EP Requirements)' prepared 14th Nov 2018). As I have already confirmed with David and yourselves, I would have no objection to the removal of the groundwater monitoring requirements. I note the details provided in the note relating to the significance of the lateral pathway (between perched groundwater and the on site drainage) and would broadly concur with your comments that it is surface water run-off dominated. I also note the suggested focus on additional investigation works for the surface run-off pathway. I do however feel it would still be beneficial to continue groundwater monitoring in some form for the purposes of monitoring any deterioration. However, I fully acknowledge that going forward there may be no requirement to do so.

As a concluding point, I would advise that obviously, despite removal of the requirement to carry out groundwater monitoring, there will still ultimately (at surrender) be a requirement to demonstrate that there has been no deterioration of groundwater quality during the life of the permit.

Kind Regards

Matt
Matt Llewellyn MSc BSc(Hons)
Arbenigwr Technegol / Technical Specialist (Contaminated Land)
Cyfoeth Naturiol Cymru / Natural Resources Wales
03000 654361
Ty Cambria / Cambria House

www.cyfoethnaturiol.cymru / www.naturalresources.wales

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From: Ahlim Hashm <hashmA@rpsgroup.com>
Sent: 05 December 2018 16:31
To: Llewellyn, Matthew <Matthew.Llewellyn@cyfoethnaturiolcymru.gov.uk>
Cc: Adrian Green <GreenAd@rpsgroup.com>
Subject: RE: [EXT] RE: removing groundwater monitoring requirement from the permit

Many thanks Matt. I look forward to hearing from you

Kind regards

From: Llewellyn, Matthew <Matthew.Llewellyn@cyfoethnaturiolcymru.gov.uk>
Sent: 05 December 2018 16:24
To: Ahlim Hashm <hashmA@rpsgroup.com>
Subject: [EXT] RE: removing groundwater monitoring requirement from the permit

Hi Ahlim,

I've had a quick look and cant see anything of significant concern. I'm out of the office today and tomorrow but will review fully on Friday and feedback to David/Alex and yourselves.

Kind regards

From: [Ahlim Hashm](#)
Sent: 04/12/2018 01:57 PM
To: [Llewellyn, Matthew](#); [Willey, David](#); [Bowder, Alex](#)
Cc: [Adrian Green](#)
Subject: RE: removing groundwater monitoring requirement from the permit

Hi Matt

I was hoping that you had a chance to review the information provided in my email below and can advise David/Alex regarding your final thoughts on the matter. If you need to discuss any aspects of the documents provided, please feel free to contact myself or Adrian. maybe we can set a meeting to discuss if necessary. I would be grateful for a response

Kind regards

From: Ahlim Hashm
Sent: 23 November 2018 15:37
To: Llewellyn, Matthew <Matthew.Llewellyn@cyfoethnaturiolcymru.gov.uk>; Willey, David <David.Willey@cyfoethnaturiolcymru.gov.uk>; Bowder, Alex <Alex.Bowder@cyfoethnaturiolcymru.gov.uk>
Subject: FW: removing groundwater monitoring requirement from the permit

Hi all

Any thoughts on my email below please? Would you required further information/discussion to enable you making a decision on the matter?

Kind regards

From: Ahlim Hashm
Sent: 15 November 2018 15:47

To: Willey, David; Bowder, Alex; Llewhellin,
Cc: Phil Ridley; johndwards@neal-soils.co.uk; Adrian Green
Subject: removing groundwater monitoring requirement from the permit

Dear David/Alex/Matt

As agreed in our last meeting, please find attached further clarification and supporting data with regards to the requested removal of groundwater monitoring and replacing it with additional annual biological monitoring in order to provide greater site-wide coverage for your consideration. As discussed, we have requested the same in an application to vary the Atlantic permit and the permitting team expect a decision to be made on this by relevant NRW officers/scientists before they can determine the application. I look forward to hearing from you

Kind regards

From: Ahlim Hashm
Sent: 12 November 2018 12:36
To: 'Willey, David'; 'Bowder, Alex'
Cc: 'Phil Ridley'; 'johndwards@neal-soils.co.uk'; Adrian Green
Subject: moving the surface other specofocations from the permit to the EMS

Dear David/Alex

As discussed in our last meeting, in the BWEM report we have proposed two changes to surface water monitoring within the field ditches and reens at Neal's and Atlantic. One change is a simple permit related matter, which you can decide on while the other is a water quality assessment criteria issue and potentially need involvement of other parties such as Kate Rodgers or other surface water quality experts within NRW. I'm writing to you today on the first one being the simpler of the two and only need your decision.

Whilst we agree that the emission limits from the point source need to remain in the permit, it is our proposal to move the surface water monitoring "other specifications" to the EMS being not limits but trigger levels which were intended to be used as a mean of triggering action when the quality of water were deemed likely to exceed the baseline quality in the levels.

As has been explained before, the water quality in the field ditches and reens can be influenced by various natural and manmade factors including effects from upstream sites and activities. Fugitive emissions from these various sources and, potentially, the site activities will influence the water quality in these ditches. Management of these influences is most appropriate through an emission management plan where various measures are implemented to control and mitigate their potential effect.

Fugitive emission monitoring is commonly included in permits under "Emissions of substances not controlled by emission limits" which states: Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

Accordingly, excluding the discharge from the point source (at Atlantic only) where "emission limits" are applied and therefore to remain in the permit, the above can be applied to all surface water monitoring locations. A reen management plan, to serve the same purpose is already in place in accordance with a planning condition. This can be resubmitted as an Emission Management Plan under the environmental permit requirement.

In terms of the second requested change, which is the use of a more appropriate assessment criteria for the water quality in the various ditches and reens, as discussed in the last meeting, we will be submitting a brief summary from the BWEM report by the end of this week for your consideration. We will also issue a clarification regarding our request for the removal of groundwater monitoring its "other specifications" from the permit. We anticipate that reaching a final agreement on the surface water assessment criteria in the filed itches and reens may take time. However finalising a decision of moving the "other specifications" from the permit to the EMS should be an easy decision to make by yourselves and can facilitate the determination of the current variation application for Atlantic while the remainder can be agreed over a longer period of time.

I look forward to hearing from you and I hope you will be able to instruct the permitting team of the same as soon as possible. If you wish to discuss this further, please don't hesitate to contact me.

Kind regards

Dr. Ahlim Hashm
Technical Director
RPS
Park House, Greyfriars Road,
Cardiff, CF10 3AF.
United Kingdom
T +44 (0)29 2066 8662
F +44 (0)29 2066 8622
D +44 (0) 2920 550663
E hashma@rpsgroup.com
W www.rpsgroup.com



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