

Natural Resources Wales permitting decisions

**Qualitech Environmental
Services Limited**

**Sandycroft Waste Management
Centre**

Decision Document

Application for a Bespoke Permit

The application number is: PAN-002394

The permit number is: EPR/BB3397HN/A001

The Applicant is: Qualitech Environmental Services Limited

The Installation is located at: Sandycroft Waste Management Centre, Prince Williams Avenue, Sandycroft, Deeside, CH5 2PX

We have decided to grant the permit for Sandycroft Waste Management Centre operated by Qualitech Environmental Services Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Table of contents
- Key issues
- Annex 1 Pre-operational conditions
- Annex 2 Improvement conditions
- Annex 3 the consultation responses

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Key issues of the decision

1 Our decision

Based on the information currently available to us we are currently minded to issue a permit to the Applicant. This would, if issued, allow it to operate the Installation, subject to the conditions in the Permit.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the permit will ensure that a high level of protection is provided for the environment and human health.

This Application is to operate an installation which is subject principally to the Environmental Permitting Regulations 2016 (EPR) and is subject to the requirements of the Industrial Emissions Directive (IED).

The permit contains many conditions taken from our standard Environmental Permit template including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the permit, we have considered the Application and accepted the details are sufficient and satisfactory to make the standard conditions appropriate.

This document should be read in conjunction with the application and supporting information and the permit.

2 How we reached our decision

2.1 Receipt of Application

The Application was accepted as duly made on **23 March 2018**. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

2.2 Consultation on the Application

The consultation requirements were identified and implemented. The decision was taken in accordance with EPR RGN 6 “Determinations involving Sites of High Public Interest”, our Public Participation Statement and our Working Together Agreements.

We advertised the Application by a notice placed on our website, which contained all the information required by the IED. The advert was placed on our website on 29 March 2018 for 20 working days.

A copy of the Application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

We sent copies of the Application to the following bodies, which includes those with whom we have “Working Together Agreements”:

- Flintshire County Council Planning Department
- Flintshire County Council Environmental Health Department
- Betsi Cadwalder University Health Board
- Public Health Wales
- North Wales Fire and Rescue Service
- Health and Safety Executive

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Annex 2. We have taken all relevant representations into consideration in reaching our determination.

2.3 Requests for Further Information

In order for us to be able to consider the Application duly made, we needed more information. We requested further information including a Non-Technical Summary, the correct application form for a new bespoke installation and some background information about the Site Condition Report (SCR). Upon receipt of this information we were able to consider the application Duly Made.

Further information was also requested by way of two Schedule 5 Notices. The first Schedule 5 Notice was sent on 08 June 2018 with a response date of 13 July 2018, requiring further information about the site infrastructure, emissions to air, site security, raw materials, technical competency, site operations, an Odour Management Plan and a Fire Prevention and Mitigation Plan (FPMP). The Applicants response to the Schedule 5 Notice was initially provided on 04 July 2018. Following feedback about the response, additional information was also provided on 04 October 2018. The additional information supplied satisfied the requirements of the Schedule 5 notice.

A second Schedule 5 Notice was sent on 06 December 2018 with a response date of 21 December 2018. The operator was asked to confirm if they also wanted to include non-hazardous waste activities in their permit, as this was not initially applied for but supporting documents refer to non-hazardous waste. Additional information about waste storage methods and emissions to air was also requested. The Applicants initial response was received on 12 December 2018.

Following further discussion the Applicant confirmed that they wished to add a non-hazardous waste transfer facility to their application. This was confirmed via email on 20 February 2019. An application form for a bespoke waste facility, waste Opra profile and revised list of waste codes to be accepted was subsequently received on 27 February 2019. Additional information was also received on 18 March 2019. The additional information supplied satisfied the requirements of the Schedule 5 notice.

A copy of the information notices and e-mails requesting further information were placed on our public register as were the responses when received.

3 The Legal Framework

The Permit will be granted, under Regulation 13 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope.

NRW is satisfied that this decision is consistent with its general purpose of pursuing the sustainable management of natural resources in relation to Wales, and applying the principles of sustainable management of natural resources. We consider that, in granting the Permit a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions.

4 The Installation

4.1 Description of the Installation and related issues

4.1.1 The permitted activities

The Installation is subject to the EPR because it carries out activities listed in Part 1 of Schedule 1 of the EPR:

- Section 5.3 Part A (1) (a) (iii) The disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day - blending or mixing prior to submission to any of the other activities listed in this section or section 5.1
- Section 5.3 Part A (1) (a) (iv) The disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day - repackaging prior to submission to any of the other activities listed in this section or section 5.1
- Section 5.6 Part A (1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3.

An installation may also comprise “directly associated activities”, which at this Installation includes:

- Fuel storage

Together, these listed and directly associated activities comprise the Installation.

The applicant also wishes to include a waste facility in the permit for the storage of non-hazardous waste prior to off-site recycling or disposal.

4.1.2 The Site

The Sandycroft Waste Management Centre, which will be operated by Qualitech Environmental Services Limited, will operate within an area of a larger site owned by the Applicant on Prince William Avenue, Deeside. The site is an ex-pharmaceutical manufacturing site that has been cleaned and decommissioned prior to this application being submitted. The site lies approximately 500 metres to the north east of Sandycroft, and 2.5 kilometres east of Queensferry. The River Dee is approximately 150 metres to the North East. It is a largely industrial area, with residential properties approximately 130 metres to the south.

The Applicant has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.

A plan is included in the permit and the Applicant is required to carry on the permitted activities within the Installation site boundary.

4.1.3 What the Installation does

The facility will consist of a waste transfer station for hazardous waste and a solvent bulking plant. The transfer station will receive packaged waste which will be sampled, sorted and segregated. The solvent bulking plant will consist of two solvent storage tanks (2 x 30.5m³) within a bunded area where suitable materials will be bulked and then sent for recovery at other locations, for example cement kilns. The proposed annual throughput of waste is 30,000 tonnes.

4.1.4 Key Issues in the Determination

The applicant applied for a hazardous waste transfer facility, carrying out the listed activities detailed in section 4.1.1. The operator was asked to clarify, via the Schedule 5 Notice sent on 06 December 2018, if they also wanted to include non-hazardous waste activities in their permit, as non-hazardous waste was referenced in supporting documents provided with the application. This would require a permit with two separate facilities for hazardous and non-hazardous waste.

On 20 February 2019 the Applicant confirmed that they would like to add a non-hazardous waste transfer facility to their application. Updated documents were provided in support of this. It was proposed that waste types including plastics, metals, wood and tyres be stored on site, which our Fire Prevention & Mitigation Plan (FPMP) Guidance lists as combustible materials for which you must follow the standards in the guidance for. The Applicant was advised that their FPMP must be updated to include non-hazardous waste storage as it was not considered this had been adequately addressed previously.

The Applicant's response on 18 March 2019 stated that they considered the storage of non-hazardous waste was covered in the FPMP. We do not consider that the FPMP meets the standard required by our Guidance and we have therefore refused this aspect of their application. The permit will only allow the storage and treatment of hazardous waste. The Applicant has been advised and will vary their permit in the future, if they want to add non-hazardous waste activities.

4.2 The site and its protection

4.2.1 Proposed site design: potentially polluting substances and prevention measures

The transfer station is separated into flammable and non-flammable areas. The non-flammable area comprises of a concrete floor and is split into eleven storage bays plus a reception area. A wall will be constructed to the rear of the transfer station due to its proximity to the site boundary, and a roof will be fitted.

A low-lying sill will be constructed around the Installation to provide containment in the event of a spill or fire. Ramps will be in place to allow vehicular access. All surface

water drains within the site boundary will be isolated. An ACO drain runs through the transfer station leading to a pit with a storage capacity of 15m³.

The flammable storage area is a concrete, separately bunded area and consists of a container storage bay (bay 12), the solvent storage tanks and a diesel storage area.

Bay 12 is a concrete bunded area which has a maximum storage capacity of 264 tonnes (264,000 litres). The area measures approximately 280m² and will be used for the storage of flammables in various containers including IBCs and drums. The bay has been designed in line with HSG 51 – Storage of flammable liquids in containers. Fire walls will be constructed around three sides of the bay.

The solvent bulk storage area consists of two stainless steel tanks, both with a capacity of 30.5m³, within their own contained bund within the larger flammable storage area. The bund will have a volume of 38.6m³ and be constructed in line with CIRIA C736. Each tank is fitted with a conservation vent and flame arrestor. The tanks will also be fitted with hi-level alarms. The vents will be connected to a carbon adsorption unit which will consist of two carbon drums, one in use and one on standby. Carbon adsorption is in line with abatement measures set out in Sector Guidance Note S5.06 (Guidance for the recovery and disposal of hazardous and non-hazardous waste), for VOCs generated through the bulking up and transfer of waste. Any surface water will be removed from the bund using onsite vacuum tankers.

The diesel storage area is approximately 6m² and will be used solely for the storage of diesel for use in fork lift trucks on-site. Storage will be limited to 2000 litres at any one time, specified in Table S1.1 of the permit.

An ACO drain channel will run through the centre of the flammable storage area to a pit with a storage capacity of 3m³. The channel will have sufficient capacity to contain at least 110% of the largest container in the storage bay. The flammable storage area will also be constructed with a surrounding bund, to provide secondary containment for the full inventory of waste to be stored.

The operator has a duty to ensure that soil and groundwater are protected in order to meet the requirements of Articles 14 (1)(b), 14(1)(e) and 16(2) of the IED. Condition 3.1.3 of the permit requires that periodic monitoring of groundwater and soil be carried out.

4.2.2 Closure and decommissioning

Permit condition 1.1.1 requires the Operator to have a written management system in place which identifies and minimises risks of pollution including those arising from closure. The Applicant does not have a site closure plan at present but has committed to developing one with 12 months of permit issue. This has been included as an improvement condition in the permit, but within a timescale of six months. We did not accept the operators suggested timescale based on the proposed activities being carried out and waste materials being stored on site.

At the definitive cessation of activities, the Operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site's current or approved future use. To do this, the Operator has to apply to us for surrender, which we will not grant unless and until we are satisfied that these requirements have been met.

4.3 Operation of the Installation – general issues

4.3.1 Administrative issues

The Applicant is the sole Operator of the Installation. We are satisfied that the Applicant is the person who will have control over the operation of the Installation if the Permit were to be granted; and that the Applicant will be able to operate the Installation so as to comply with the conditions included in the Permit, if issued.

We are satisfied that the Applicant's submitted OPRA profile is accurate. The OPRA score is 97. The OPRA score will be used as the basis for subsistence and other charging, in accordance with our Charging Scheme. OPRA is Natural Resources Wales method of ensuring application and subsistence fees are appropriate and proportionate for the level of regulation required.

4.3.2 Relevant Convictions

Our COLINS database has been checked for any relevant convictions relating to the Company or any of the individuals listed as relevant people on Companies House. No records have been found.

4.3.3 Financial Provision

There is no known reason to consider that the Applicant will not be financially able to comply with the permit conditions. The decision was taken in accordance with EPR RGN 5 on “Operator Competence”.

4.3.4 Management

The Applicant has stated in the Application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our “How to comply with your environmental permit guidance”. The applicant has an EMS which is certified to ISO14001. The operating procedures and training requirements that are specific to this facility will be incorporated into the current EMS. The Applicant submitted a summary of the EMS with their application.

We are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

4.3.5 Technical Competence

WAMITAB certificates for the treatment and transfer of hazardous waste have been provided, along with a current Continuing Competency certificate for both awards.

4.3.6 Accident management

The Applicant has produced an Accident Management Plan which considers the risk of fire, flood, vandalism, spills and containment failure. Risk minimisation techniques have been identified and actions prepared for in the event of an incident. Procedures will be incorporated into the site’s EMS.

4.3.7 Fire Prevention and Mitigation

As the primary activities proposed at the site are the storage and treatment of hazardous waste the applicant was asked to consider relevant HSE guidance while producing their FPMP. The following guidance was used:

- HSG51 for the storage of flammable liquids in containers.
- HSG176 for the storage of flammable liquids in tanks
- CIRIA 736 Containment systems for the prevention of pollution

NRWs FPMP guidance is not applicable to the storage of hazardous waste.

As discussed in section 4.2.1 firewalls will be constructed in storage areas in line with the above guidance. Separation distances for the bulk storage tanks and storage bays have been calculated in line with the above guidance.

The existing CCTV cameras on site will be replaced by new cameras which will provide thermal monitoring of the transfer station and flammable storage area. They will be monitored out of hours by an external security company. The solvent tanks will be fitted with a fire suppression system.

Firewater run-off would initially be contained within the bunded areas of the site. Qualitech would have vacuum tankers on-site within 30 minutes in order to remove firewater.

The Fire Management Plan has been included in the Operating Techniques section of the permit and is therefore enforceable.

4.3.8 Site security

The site boundary is fenced and access is by way of a main gate. CCTV is installed across the site and is monitored 24/7 by an external company. In the event of unauthorised access a key holder can be present within approximately 10 minutes.

Having considered the information submitted in the Application, we are satisfied that appropriate infrastructure and procedures will be in place prior to start up to ensure that the site remains secure.

4.3.9 Operating techniques

The operator has pre-acceptance and acceptance procedures in place in line with *Sector Guidance Note S5.06 (SGN S5.06) – Guidance for the recovery and disposal of hazardous and non-hazardous waste*. Where practicably possible, a detailed survey of waste materials for disposal or treatment will be undertaken at source prior to acceptance at the site. Where this is not possible a full description of the waste will be obtained from the producer. Unless a sample has already been taken by a third party and documented evidence of the result is available, a representative sample of the waste will be taken and analysed at the site laboratory, usually by the site chemist or at a suitable testing facility if required. A pre-booking system will be operated for waste acceptance to site and waste only taken when there is capacity to do so. All waste received will be weighed and be accompanied by supporting paperwork in the form of waste transfer notes or hazardous waste consignment notes. No waste will be accepted to site unless a suitable treatment, recovery or disposal route is identified beforehand. A quarantine area will be provided for any damaged, corroded or unlabelled containers or waste that is not as expected.

The waste storage area will comprise of two storage tanks for blended mixed solvents and 12 storage bays for containerised hazardous waste. No waste will be stored for longer than six months. All waste to be accepted and stored on site will be in containers or 1000 litres or less, except for the bulk liquids to be stored in the solvent tanks. The maximum storage capacity for solvents is 61m³, in two stainless steel tanks each with a capacity of 30.5m³ (35,000 litres) The maximum capacity of operations overall is 1,011 tonnes of various sized containers. Anticipated daily acceptance will be approximately 100 tonnes.

A number of HSE guidance documents are relevant for hazardous waste storage activities, namely:

HSG71 - Chemical Warehousing – The storage of packaged and dangerous substances

HSG51 – Storage of flammable liquids in containers

HSG176 – Storage of flammable liquids in tanks

All of these documents are referenced in S5.06 so will therefore be a requirement of operating techniques at the site. SGN S5.06 and the HSE documents have been incorporated into the operating techniques table of the permit, and are therefore enforceable.

Since the application was first submitted the new Waste Treatment Sector BAT Conclusions document was published on 17 August 2018. A request was sent via email on 02 November 2018 for the Applicant to carry out a BAT assessment to demonstrate how they will comply with the BAT conclusions. New waste installations must use Best Available Techniques (BAT) and meet associated emission limits from the date that they are first permitted. A completed assessment was provided on 07 November 2018. We are satisfied that BAT will be applied at the site.

4.3.10 Energy efficiency

The Applicant is required by condition 1.2.1 of the permit, to ensure that energy is used efficiently and review whether improvements can be made, at least every four years. The applicant has committed to produce an energy efficiency plan within 12 months of permit issue, as the site is not yet operational. We have included this as an improvement condition within the permit.

The Operator is required to report energy usage under condition 4.2 and Schedule 4 of the permit. The following parameters are required to be reported: electricity usage.

4.3.11 Efficient use of raw materials and water

Water will be used on site for domestic office use, and general housekeeping and cleaning activities. The applicant has committed to carry out a waste and water minimisation audit within 12 months of permit issue, as the site is not yet operational. We have not included this as an improvement condition as the Applicant considers that water usage will be relatively low. We accept this assumption as water usage is not an integral part of the activities being carried out on site.

The Applicant is required by condition 1.3.1 of the permit, to ensure that raw materials and water are used efficiently and review whether improvements can be made, at least every four years. There is also a requirement to report water usage under condition 4.2 and Schedule 4 of the permit.

4.3.12 Avoidance, recovery or disposal of wastes produced by the activities

Having considered the information submitted in the Application, we are satisfied that the waste hierarchy referred to in Article 4 of the WFD will be applied to the generation of waste and that any waste generated will be treated in accordance with this Article.

The operator has committed to carrying out a waste minimisation audit within 12 months of permit issue.

We are satisfied that waste from the Installation that cannot be recovered will be disposed of offsite using a method that minimises any impact on the environment. Permit condition 1.4.1 will ensure that this position is maintained.

5 Minimising the Installation's environmental impact

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, discharges to ground or groundwater and generation of waste. All these factors are discussed in this and other sections of this document.

For an installation of this kind, the principal emissions are point source emissions to air, and water, and fugitive emissions including odour.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring to ensure a high level of protection.

5.1 Assessment of Impact on Air Quality

The only emissions to air from the site will be from the solvent bulking tanks. Carbon filters will be used for abatement. The annual mass emission of VOCs has been calculated as Toluene, the compound likely to be present in the greatest quantity. The applicant has completed a H1 assessment using the short and long term Environmental Assessment levels for Toluene. Both the short and long term process contributions screen out as insignificant. Deposition to ground does not need to be considered for Toluene.

The emission point has moved since the application was originally submitted. The applicant has confirmed that there is no change in the effective release height of the emissions, and that the potential impact of any emissions to air has not changed since their initial assessment was carried out.

5.2 Assessment of odour impact

The applicant identified that some waste materials bought onto site may have the potential to cause odour. The applicant was asked to produce an Odour Management Plan (OMP) in line with H4 (Horizontal Guidance on Odour) in the Schedule 5 notice sent on 08 June 2018. An OMP was received on 04 July 2018 and was assessed against H4 and the requirements of the waste treatment BAT conclusions published on 17 August 2018. It was not considered that the OMP met the requirements.

The applicant provided an updated OMP on 12 December 2018. They have stated that during the commissioning of the site they will carry out a monitoring programme in order to determine the monitoring frequency required at the site. The OMP has been incorporated into Table S1.2 of the permit as an Operating Technique and is therefore enforceable, and it will be regularly reviewed by the Operator.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of odour.

5.3 Assessment of impact to surface and ground water

Any rain water accumulation in bunded areas or the drainage pits will be removed using onsite vacuum tankers and then taken off site to a permitted facility for treatment. There are no direct or indirect emissions to groundwater.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

5.4 Emissions to sewer

There will be no emissions to foul or surface water sewer from the activities on site.

5.5 Noise Assessment

The applicant has considered potential sources of noise at the site and has identified on site vehicle movements and pumps on the solvent plant. Regular maintenance of plant and vehicles will minimise the risk of noise. The operator plans to carry out a noise assessment during the commission phase of the site, within six months of permit issue. This commitment has been included as an improvement condition within the permit.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of odour.

5.6 Impact on European Protected Species

Our species advisors have been consulted and it is not considered that the facility will be detrimental to the maintenance of the favourable conservation status (FCS) of any known local populations of European Protected Species (EPS) at this locality.

The proposal is also not considered likely to affect any local populations of British fully protected species.

5.7 Impact on Habitats sites, SSSIs, non-statutory conservation sites etc.

Screening shows the following protected sites within the relevant distances:

SAC (within 10km)

River Dee & Bala Lake (Wales) 150m NE

River Dee & Bala Lake (England) 5km SE

Deeside & Buckley Newt Sites 4km WNW & 5km SW

Dee Estuary (Wales) 3km NW

Dee Estuary (England) 3km NW

SPA (within 10km)

Dee Estuary (Wales) 3km NW

Dee Estuary (England) 6km NW

RAMSAR (within 10km)

Dee Estuary (Wales) 3km NW

Dee Estuary (England) 6km NW

SSSI (within 2km)

Afon Dyfrdwy (River Dee) 150m NE

Local Wildlife Site (within 2km)

Engineer Park

100m NNE

Ancient Woodland (within 2km)

None

A Habitats Risk Assessment (HRA) is not required because there is no conceivable impact pathway to any of the Natura 2000/Ramsar sites listed above.

The only emissions to air will be Volatile Organic Compounds (VOCs) from the solvent storage tanks. The VOCs will largely comprise of Toluene, Xylene, Methanol and Isopropyl Benzene. There are no environmental standards for these substances for protected conservation areas. There are no process emissions from the site and all surface water will be contained and tankered away.

A Form 1 and Appendix four have been completed and are available on our public register.

6 Setting ELVs and other Permit conditions

6.1 Translating BAT into Permit conditions

Article 14(3) of IED states that BAT conclusions shall be the reference for permit conditions. Article 15(3) further requires that under normal operating conditions; emissions do not exceed the emission levels associated with the best available techniques as laid down in the decisions on BAT conclusions.

We have included an emission limit to air, for Total Volatile Organic Compounds based upon the limits in the BAT Conclusions for the treatment of water-based liquid waste. As a newly permitted site the emission limit must be met from the commencement of operations on site.

6.1.1 National and European EQSs

As detailed in section 5.1, the environmental impact of the installation has been assessed against relevant EQSs, at the level of performance required by IED. The installation will not result in the breach of any EQSs. We accept that the applicant's proposals are indicative BAT.

6.2 Monitoring

We have decided that monitoring should be carried out for the parameters listed in Schedule 3 using the methods and to the frequencies specified in those tables. These monitoring requirements have been imposed in order to demonstrate compliance with the Waste Treatment BAT Conclusions. As the BAT conclusions were published after the application was submitted we have included a pre-operational condition in the permit requiring the Applicant to put together a monitoring method and schedule in order to demonstrate how they will meet the monitoring requirements.

6.3 Reporting

We have specified the reporting requirements in Schedule 4 of the Permit to ensure data is reported to allow timely review by Natural Resources Wales. This will help to ensure compliance with permit conditions and to monitor the efficiency of energy and water usage at the installation.

ANNEX 1: Pre-Operational Conditions

In their letter dated 04 July 2019, in response to the Schedule 5 sent on 08 June 2018, the applicant stated that the construction of permitted areas and associated infrastructure would not be started until the permit is issued. We have included a pre-operational condition to ensure that no waste is brought onto site until the appropriate infrastructure and drainage is in place.

We have also included a requirement for the Applicant to put in place a monitoring procedure to demonstrate how they will meet the monitoring requirement in the permit, which is to demonstrate compliance with BAT.

Table S1.4 Pre-operational measures

Reference	Pre-operational measures
1	No waste shall be brought onto site until such time that the appropriate infrastructure, drainage and fire protection strategy measures have been put in place for all areas where waste will be stored and treated. Construction shall be as detailed in the Fire Management Plan and site drainage plan provided on 12/12/2018. All bunds shall be CIRIA C736 compliant.
2	A written procedure to demonstrate how emissions to air will be monitored, should be produced and submitted to NRW for approval before the solvent storage tanks are put into use.

ANNEX 2: Improvement Conditions

The Applicant has proposed a number of actions that they will carry out within the first year of operations, as they are unable to do so until the site is operational. Although it is not typical to include improvement conditions in a permit for a new site, they have been included to ensure that the applicant carries out their proposed improvements.

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The Operator shall submit a written plan for approval by NRW to ensure that the appropriate measures are in place for the closure and decommissioning of the facility.	Within six months of permit issue
IC2	The Operator shall complete a noise assessment survey, identifying all potential noise sources from the site. Where potential noise sources are identified, the Operator shall use Best Available Technique (BAT) so as to prevent or where that is not practicable to reduce emissions of noise and vibration from the installation. Timescales for implementation should be set. A report demonstrating how the above has been achieved should be submitted to NRW for review.	Within six months of permit issue
IC3	The Operator shall produce a written energy efficiency plan for submission to NRW. The plan shall identify current energy consumption, where improvements can be made and timescales for implementation.	Within 12 months of permit issue

ANNEX 3: Consultation Responses

A) Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

1) Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from Betsi Cadwaladr University Health Board	
Brief summary of issues raised:	Summary of action taken / how this has been covered
<u>Overall Conclusion</u> We have no grounds for objection based upon the public health considerations contained within the application. The process should be operated in accordance with sector Best Available Techniques. However we would recommend that a fire and incident management plan is agreed with the regulator to mitigate off site risks to the public. We would also advise that if not already in place that the Environmental Management System is externally accredited e.g. ISO 14001. <u>Public Health Risk Assessment</u> The applicant has identified nearby sensitive receptors and (as required but the permit application process) techniques for the containment of spillages and odour. The applicant has indicated that an Environmental Management System will be in place but it is not clear whether this is internal or not. At the time of comment we have not identified a fire/accident prevention/management plan.	A full BAT assessment was requested following the publication of the new waste Treatment BRef in August 2018. We are satisfied that BAT will be applied at the site. The Applicant was asked to produce a fire prevention and mitigation plan. This has been written in accordance with HSE guidance and included within the Operating Techniques table in the permit. Qualitech have an externally audited EMS in place. We are satisfied that a site specific EMS will be implemented at the site.

2) Consultation Responses from Members of the Public and Community Organisations

a) Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

Response Received from None received	
Brief summary of issues raised:	Summary of action taken / how this has been covered
N/A	N/A

b) Representations from Community and Other Organisations

Response Received from None received	
Brief summary of issues raised:	Summary of action taken / how this has been covered
N/A	N/A

c) Representations from Individual Members of the Public

Response Received from None received	
Brief summary of issues raised:	Summary of action taken / how this has been covered
N/A	N/A