Report: *CWM1001/04*
Date: *July 2015*

RESIDUAL WASTE MATERIALS RECYCLING FACILITY, NANTYCAWS WASTE MANAGEMENT SITE, LLANDDAROG ROAD, NANTYCAWS, CARMARTHEN, SA32 8BG

BESPOKE ENVIRONMENTAL PERMIT VARIATION APPLICATION

Prepared for
CWM Environmental Limited

Prepared by

Office Suite 2
The Beacon Centre for Enterprise
Dafen
Llanelli
SA14 8LQ

Tel: 01554 780544
Fax: 01554 759988
E-mail: info@stratus-environmental.co.uk

Project Quality Assurance
Information Sheet

NANTYCAWS RWMRF BESPOKE ENVIRONMENTAL PERMIT VARIATION APPLICATION

Report Number	:	CWM1001/04	***Report Status***	:	FINAL
Report Date	:	July 2015			
Prepared for	:	CWM Environmental Limited			
Prepared by	:	Stratus Environmental Limited Office Suite 2 The Beacon Centre for Enterprise Dafen Llanelli SA14 8LQ			

Written by:



Lucy J Webb
Environmental Consultant

Reviewed & Approved by:



Mark L Griffiths
Environmental Director

NON TECHNICAL SUMMARY

Non-Technical Summary

CWM Environmental Limited operate a Residual Waste ('Dirty') Materials Recycling Facility (RWMRF) at Llanddarog Road, Nantycaws, Carmarthen, SA32 8BG (National Grid Reference: 247280, 217631). In October 2013, the operator was granted an Environmental Permit (EPR/KB3097TU) for the operation of a Household, Commercial and Industrial waste transfer station with treatment, including the production of Refuse Derived Fuel (RDF). The permit allows for the manual and/or mechanical sorting, separation, screening, baling, shredding, crushing, compaction and bulking up of permitted inert and non-hazardous wastes for the purposes of recovery or disposal. RDF is produced from suitable 'fines' resulting from the mechanical processing of waste at the site, as well as other permitted wastes as stipulated within the permit.

CWM Environmental Limited now propose to extend their current permit boundary to encompass an additional area of land to the south of the current RWMRF in order to account for an extension of the current building. The additional space will allow for the effective environmental management of the site, operational flexibility and improve the site layout. It is envisaged that the building extension area will be predominantly utilised to accommodate RDF wrapping and storage. There will be no change to the current activities carried out on site, merely an extension of the building into the revised permit area.

The operator requires the removal of the 75 tonnes per day limit related to the treatment of waste for the purpose of recovery for both activities listed (Waste Transfer Station and RDF Processing Facility), as stipulated within the Schedule of Activities (Table S1.1) within the Environmental Permit (EPR/KB3097TU). This will allow for the increased daily production of RDF at the site, but still within the overall annual tonnage stipulated. The RWMRF does not fall within the remit of activities which are subject to the requirements of the Industrial Emissions Directive (IED) after review of recent regulatory guidance and position statement on this type of activity.

The RWMRF is currently permitted to accept up to 125,000 tonnes of waste per annum. The site will not require a change in the annual tonnage allowance in light of the proposed environmental permit boundary extension or removal of pre-treatment (for recovery) tonnage limits.

All operations are carried out upon impermeable hardstanding with subsequent drainage to a sealed sump. Isolation of discharge is possible where necessary. Fugitive emissions monitoring will be undertaken as required and in accordance with the site's Environmental Permit.

Following on from the issuing of the Environmental Permit in October 2013, the operator has identified the need to increase the permitted area as a result of the aforementioned changes as well as to remove the 75tpd limit associated with pre-treatment activities for the recovery of permitted waste types. This application therefore seeks to:

1. Extend the permit boundary (to account for an extension of the RWMRF building) to incorporate a larger proportion of the land under the applicant's control. The proposed extension area has been considered as part of the Site Condition Report submitted as part of this application.
2. Remove the 75 tonnes per day limit associated with the pre-treatment (for recovery) of permitted wastes for both A1 and A2 Activity References to permit increased daily RDF production at the site. This will not require an increase in annual tonnage allowance.

This application seeks to address the aforementioned points and includes the appropriate fee, application forms, supporting statement, drawings and appendices.

RESIDUAL WASTE MATERIALS RECYCLING FACILITY, ENVIRONMENTAL PERMIT VARIATION APPLICATION NANTYCAWS WASTE MANAGEMENT SITE, LLANDDAROG ROAD, NANTYCAWS, CARMARTHEN, SA32 8BG

CONTENTS

1.0 INTRODUCTION 1
1.1 Scope 1
1.2 Background 1
1.3 Proposed Variation Application Overview 2

2.0 SITE DESCRIPTION 4
2.1 Site Setting 4
2.2 Site Operation Summary 5

3.0 OPERATIONAL VARIATION REQUIREMENTS 8
3.2 Risk Assessment 9

4.0 CONCLUSIONS 10

Drawings

Drawing No.	Title
CWM1001/5/01	Site Location Plan
CWM1001/5/02	Site Boundaries Plan
CWM1001/5/03	Indicative Proposed Operational Layout
CWM1001/5/04	Indicative Proposed Drainage Layout

Appendices

Appendix No.	Title
Appendix 1	Site Condition Report
Appendix 2	TCM Details
Appendix 3	ISO14001 Certificate
Appendix 4	Fugitive Risk Assessment Review
Appendix 5	Accident Risk Assessment Review
Appendix 6	Environmental Permit (EPR/KB3097TU)
Appendix 7	Clinical Waste Procedure

1.0 INTRODUCTION

1.1 Scope

1.1.1 Stratus Environmental Limited (Stratus) has been appointed by CWM Environmental Limited (CWM) to assist with the preparation of an Environmental Permit Variation Application for their Nantycaws Residual Waste 'Dirty' Materials Recycling Facility (RWMRF). This Supporting Statement provides a summary as to the Permit Variation Application required as a result of the aforementioned request. Supporting drawings and appendices are included towards the rear of this documentation.

1.2 Background

1.2.1 Nantycaws Residual Waste ('Dirty') Materials Recycling Facility (RWMRF) is located at Nantycaws Waste Management Facility, Llanddarog Road, Nantycaws, Carmarthen, SA32 8BG (National Grid Reference 247280, 217631). Prior to the development of the wider Nantycaws facility over the last 20-30 years, the site was comprised of undeveloped fields which were utilised for agricultural purposes. More recently, planings and tarmacadam were laid at the site to form a temporary car park, which served the wider site operations. Subsequent to this, in 2013, the Residual Waste 'Dirty' Materials Recycling Facility (RWMRF) was developed at the site.

1.2.2 The wider Nantycaws Waste Management Facility includes a number of waste activities including landfill disposal, In Vessel (IVC) and Open Windrow Composting (OWC), a 'clean' Materials Recycling Facility (MRF) and Household Waste Recycling Centre (HWRC). The applicant's landholding covers an area of *c.* 62ha, with the current RWMRF occupying *c*. 0.8ha.

1.2.3 The site received its Environmental Permit (EPR/KB3097TU) in October 2013 which authorises the operation of a Household, Commercial and Industrial Waste Transfer Station (referred to as a Residual Waste 'Dirty' Materials Recycling Facility) with treatment, including the production of Refuse Derived Fuel (RDF). Wastes accepted at the Residual Waste 'Dirty' Materials Recycling Facility (RWMRF) are limited to inert and non-hazardous wastes which are permitted to be treated via manual and/or mechanical sorting, separation, screening, baling, shredding, crushing, compaction and bulking of permitted wastes for the purposes of recovery or disposal to the adjacent landfill. The manufacture of RDF is produced via the use of suitable 'fines' from the mechanical processing of wastes at the site, as well other authorised wastes which are accepted under the current Environmental Permit (EPR/KB3097TU-Table S2.2). All activities are carried out inside a building upon an impermeable surface with sealed drainage (foul water drains to a sealed sump). The maximum quantity of waste accepted at the site is 125,000 tonnes per annum.

1.3 Proposed Variation Application Overview

1.3.1 The existing Environmental Permit (EPR/KB3097TU), issued in October 2013 allows for the manual and mechanical sorting of a range of non-hazardous and inert wastes for the purpose of recovering recyclable fractions or as a feedstock for RDF production.

1.3.2 Following on from the initial stages of development of the RWMRF, the operator requires additional space in order to allow for increased internal operational flexibility and to allow further internalisation of activities which will further reduce the potential for environmental emissions. Therefore, it is considered necessary to extend the current footprint of the site to include an area of land to the south of the current operation. The extension of the building into the revised permit boundary area will predominantly be utilised to accommodate the wrapping and storage of baled RDF.

1.3.3 The extension area has previously been utilised as a pre-treatment area which allowed incoming materials to be received and redirected to the appropriate destination, whether this was for off-site recovery or disposal at the adjacent landfill. However, due to on-going development at the wider Nantycaws waste management facility this pre-treatment area is no longer required and can therefore be utilised to facilitate an extension to the RWMRF building.

1.3.4 In addition to the above, the operator also requires the removal of the limit (75 tonnes per day) stipulated within the Environmental Permits (EPR/KB3097TU), Schedule of Activities (Table S1.1) in relation to the pre-treatment of wastes for the purpose of recovery, for the Waste Transfer Station (WTS) and Refuse Derived Fuel (RDF) processing facility.

1.3.5 The rationale behind the pre-treatment of residual waste is to improve and facilitate the handling of the fuel as well as to ensure maximum extraction of recyclate from the waste stream. Therefore by utilising the Environment Agency's interpretation of pre-treatment (as described in Regulatory Guidance Note No.2) and assuming that Natural Resources Wales (NRW) will adopt a similar stance, the operation is not captured by the requirements of the Industrial Emissions Directive (IED). Given this, it is considered that a daily tonnage limit associated with pre-treatment activities (for the purposes of recovery) is not required. This will allow the operator to increase the daily production rate of RDF.

1.3.6 The proposed extension will allow for operational improvements, maximise the potential for recovery of waste as well allowing for the effective environmental management of the site. The proposal is described in more detail in the proceeding sections of this Supporting Statement, along with a review of the appropriate risk assessments as a result of the proposed changes. There will be no change to the waste operation carried out on site, which has already been considered in the original Environmental Permit (EPR/KB3097TU) application and has therefore already been risk assessed. Notwithstanding this, a review of the appropriate risk assessments has been

undertaken to ensure the required environmental compliance is achieved when taking into account the proposed changes.

1.3.7 The Site Condition Report (SCR) submitted as part of this Environmental Permit Variation Application takes into account the area in which operations take place and includes the proposed extension to the boundary to which this application relates. The applicant's ownership extends beyond the required Permit Boundary, to encompass the wider activities of Nantycaws Waste Management Facility. Reference to the SCR should be made as appropriate.

1.3.8 Following on from extensive pre-application discussions with the client and the regulator (Natural Resources Wales), a clear picture was formulated regarding the most appropriate approach to the required variation.

1.3.9 After completion of discussions referred to in paragraph 1.3.6, with Natural Resources Wales (NRW), it was considered and confirmed by the Regulator that the proposed changes could be made via a 'Normal' Variation. However, both Status Environmental Limited and the operator's interpretation of NRW Guidance and potential risks to the wider environment as a result of the change, give the EPVA a classification of 'Minor Technical'. As a result, it is not considered that the application warrants the Normal Variation fee (£7506) and therefore, as agreed by NRW, **the operator is seeking fee abatement in relation to this application**.

1.3.10 A summary of the elements of the existing permit to be varied are given below;

- Increase in the permitted area. Revised operational area has been subject to a Site Condition Report.
- In relation to the WTS and RDF processing activity, removal of the daily pre-treatment of waste for incineration or co-incineration limit of 75 tonnes for recovery is required. There will be no change to the waste operation carried out at the site.

1.3.11 As indicated by NRW this application represents a 'Normal' class of variation. This attracts an application fee of the Variation multiplier (£139) x the current site OPRA score (54) which gives a fee of £7506.

1.3.12 The application consists of the following documents;

- Application Forms and Fee;
- Site Condition Report;
- Non-Technical Summary;
- Supporting Statement;
- Appendices
- Drawings including Site Location Plan, Site Boundaries Plan and Indicative Proposed Operational and Drainage Layout

2.0 SITE DESCRIPTION

2.1 Site Setting

2.1.1 The site under consideration of this application to vary Environmental Permit (EPR/KB3097U) is Nantycaws Residual Waste ('Dirty') Materials Recycling Facility (RWMRF) located at Nantycaws Waste Management Facility, Llanddarog Road, Nantycaws, Carmarthen, SA32 8BG. The Ordnance Survey grid reference is NGR 247280 217631.

2.1.2 Access to and egress from the site is undertaken via a dedicated junction off the westbound carriage of the A48, via the main access road (an unclassified road to the south of the A48) which also serves the wider waste management operations at the site. The site is located approximately 1.3km to the south east of the village of Nantycaws, on the southern side of the A48 dual carriageway between Cross Hands and Carmarthen. The small village of Llanddarog is situated approximately 2.9km to the south east.

2.1.3 The site is bounded in all directions by the wider footprint of the applicant's landholding. The 'clean' MRF for sorting co-mingled recyclates, is situated immediately adjacent to the sites eastern boundary, with a hedgerow and open windrow composting activities to the west. There are open fields (which are owned by the applicant) and further hedgerows situated to the north, beyond which the A48 dual carriageway runs in a broadly east/west alignment. The site is bound upon its southern boundary by the unclassified site access road beyond which lies the site offices, weighbridge and car parking facilities.

2.1.4 The land was previously utilised for grazing purposes as part of the "*Llety-dau-filwr*" farm holding. It remained in this undeveloped state until recently when the area was utilised as a temporary car park for the wider site operations and ultimately to accommodate the RWMRF facility. The proposed extension area (to the south) is currently a concreted area which has been previously utilised for pre-treatment of waste prior to its disposal in the adjacent landfill.

2.1.5 The site is bounded by a combination of steel palisade gates, fencing and in places landscaped hedge lines. The main access gate is kept secure out of hours. During operational hours, the main access gate to the north of the wider site (just off the A48) is kept open for staff, customers and visitors. In addition to this the RWMRF operations will be undertaken within a building which will be kept secured (locked) during out of hours.

2.1.6 The land use surrounding the wider area of the applicant's landholding is predominantly rural in nature interspersed with farm properties and small villages, as well as the busy A48 dual carriageway.

2.1.7 The nearest residential properties include those at "*Ty-Hen*" located circa. 260m to the North West, "*Llety-dau-filwr*", located *c.* 330m to the south east, as well as an unnamed residential property located approximately 310m to

the North West of the application site. A fuel station is located to the north of the A48, approximately 280m north of the site. A large commercial poultry unit is located beyond Nantycaws landfill site to the west.

2.2 Site Operation Summary

2.2.1 The site is situated on previously undeveloped agricultural land. In recent years it has been utilised as a temporary car park for the wider waste management site operations. At present, it is permitted by Natural Resources Wales as a Residual Waste ('Dirty') Materials Recycling Facility (RWMRF) which includes the production of Refuse Derived Fuel (RDF). The facility is authorised to process up to 125,000 tonnes of inert and non-hazardous waste per year emanating from Household ('black bag' waste), Commercial and Industrial sources and also includes non-hazardous bulky and separate clinical waste bulking and transfer (clinical waste is not permitted to be utilised within the RDF process). This range of mixed waste is treated via manual and/or mechanical sorting, separation, screening, baling, shredding, crushing, compaction and bulking for the purposes of recovery or disposal.

2.2.2 The Technically Competent Management (TCM) qualified staff for the operation includes Sean Gallagher (Operations and HSE Manager) and Bruce Creamer (MRF manager). They both hold the relevant certificates for the treatment and transfer of the permitted wastes. Copies of all necessary certificates are included within **Appendix 2.**

2.2.3 The RWMRF facility aids the recovery and recycling of mixed recyclable and residual wastes predominantly from Household ('black bag' waste), Commercial and Industrial sources for onward transfer to re-processing facilities. Recyclates are transferred via a covered conveyor to the adjacent Materials Recycling Facility (MRF) for further processing.

2.2.4 The plant/equipment currently consists of a bag splitter, a number of sort-lines/picking belts and separating equipment (such as screens, magnets, trommels, eddy current separators etc), baling plant, shredder as well as mobile waste handling plant, (grab and loading shovel), forklifts etc.

2.2.5 In terms of Duty of Care requirements, the waste producer is required to carry out level 1 and 2 compliance checks i.e. basic characterisation and compliance testing (as required). CWM also carries out level 3 checks which includes on site verification carried out by site personnel. All clinical waste will be handled in accordance with Sector Guidance Note EPR5.07 and the operators clinical waste procedure (contained within **Appendix 7**).

2.2.6 Vehicles arrive on site via the unclassified road situated to the south of the A48. When entering the site, the waste load must stop at the weighbridge in order for the appropriate weights of the waste load to be obtained and to ensure the undertaking of the Duty of Care checks in accordance with the site's Environmental Permit. The waste delivery would then receive further instruction from the weighbridge operator.

2.2.7 If it is the first time the waste producer has visited the site, then they are required to produce documented proof that they are a registered waste carrier as well as undergoing a site induction and an introduction to site health and safety. All vehicles entering the site must produce a valid waste transfer note before entry is permitted. When possible a visual inspection will be carried out at the weighbridge to confirm the description on the transfer note. Once satisfied, the driver will be directed to the appropriate area for unloading and storage, pending treatment. A second round of checks is carried out at the unloading stage to reconfirm the waste description as designated by the waste transfer note. If necessary, waste vehicles are further weighed once more when exiting the site if obtaining of a tare weight is needed.

2.2.8 In the event that wastes are delivered that are not considered acceptable under the site's Environmental Permit, they will either be rejected or held on site for further investigation/liaison with Natural Resources Wales.

2.2.9 As previously mentioned, after materials are thoroughly checked in at the weighbridge, they are sent to the appropriate location within the RWMRF for unloading and storage pending treatment. The untreated mixed waste materials are stored within the building prior to treatment via the RWMRF process.

2.2.10 The RWMRF process line receives mixed residual and recyclable non-hazardous, inert waste material from Household, Commercial and Industrial sources (as well as some non-hazardous bulky and clinical waste) which requires separation for onward processing. These materials are subject to a series of manual and automated sorting operations which includes a bag splitter, screens, magnetic separators, eddy current separator, elevated picking station etc. Materials will be removed and sorted into fractions such as paper, plastics, cardboard, metal etc. Separated recyclable materials will be placed into a range of containers prior to transfer to the adjacent clean MRF via covered conveyor.

2.2.11 The residual waste fines from the sort line, as well as other permitted residual wastes (contained within Table S2.2 of Environmental Permit EPR/KB3097TU, a copy of which is included in **Appendix 6**) are deposited to a residual waste storage bay which is located within the RWMRF building. Further to this, suitable residual waste emanating from the adjacent 'clean' MRF operation is transferred via a second covered conveyor to the RWMRF for storage pending treatment. From here the waste is separated into two fractions, a residual waste that is suitable as RDF and a residual waste for disposal only (at the adjacent landfill). Other waste sources identified to contain lower levels of recyclable materials are deposited directly into the RDF input storage bay, but are subject to a mechanical pick to extract identified large recoverable materials such as metals, wood and large inerts. These materials are removed and set aside for resale or suitable disposal. The residues from this process along with those from the sort line enter the RDF preparation route.

2.2.12 The prepared (suitable) RDF feedstock is loaded by an excavator fitted with a grab handler or loading shovel into an electrically powered shredder, which is situated within the RWMRF building. The shredder reduces the size of any large items for the primary purpose of improving the baling process and to facilitate handling. The shredded material is then transported via conveyor to the baling plant. Within the baling plant, the material is tumbled and condensed to form a round bale. The bales of residual waste are then transferred to a storage area in order to undergo wrapping. The round bale is stabilized with netting and then fully wrapped with multi-layers of film. This guarantees that the moisture content of the material stays at the required levels. The wrapped RDF bales are then stored prior to onward transfer to an appropriate facility. The resulting bales can be directly used as a fuel to produce electricity.

2.2.13 All equipment and treatment processes are housed within a purpose built building, with doors that only open to allow access. This avoids the risk of fugitive emissions from the RWMRF. All environmental monitoring requirements are stipulated within the current Environmental Permit contained within **Appendix 6**. All operations are carried out upon impermeable hardstanding with sealed drainage.

2.2.14 The company obtained EMS ISO14001 status for the waste management operations at Nantycaws in 2012 (a copy of the certificate is included within **Appendix 3**). With this in mind, the Residual Waste 'Dirty' Materials Recycling Facility (MRF) is operated to the highest environmental standards and with cognisance to the sites Management Plan and Environmental Permit.

2.2.15 In terms of the operation going forward, the treatment process will not alter however the operator will no longer be limited to a daily pre-treatment limit for pre-treatment of wastes for incineration or co-incineration for recovery and the wrapping/storage of the baled RDF will be relocated to the extension area of the building (which is subject to this Environmental Permit Variation Application).

3.0 OPERATIONAL VARIATION REQUIREMENTS

3.1.1 As discussed in Section 1, this application seeks to vary the existing Environmental Permit to increase the area of land included in the Permit boundary to allow for the extension of the RWMRF building. This will allow greater operational flexibility and enhance the existing environmental controls by ensuring internalisation of activities within an enclosed environment. The extension area will accommodate the wrapping and subsequent storage of RDF bales.

3.1.2 Further to the above, the operator is also requesting the removal of the daily pre-treatment limit (75 tonnes) of waste for incineration or co-incineration, in relation to the WTS and RDF processing facility, as stipulated within Table S1.1 of Environmental Permit EPR/KB3097TU. Given that the waste operation is not captured by IED (as discussed in section 1.3.4) it is not necessary to state a daily tonnage limit in relation to the aforementioned activity which will permit increased daily RDF production at the site within the overall annual permitted tonnage.

3.1.3 As alluded to above, the waste quantities accepted at the site will not be amended as part of this application and will therefore remain at 125,000 tonnes per annum.

3.1.4 As part of applying for this Environmental Permit Variation Application, due to the proposed Permit boundary extension, there is a requirement to produce a Site Condition Report (SCR) in support of the application documentation. A Site Condition Report provides for an accurate description of the land condition prior to the permitted operations commencing. This document is prepared in accordance with Environment Agency guidance document H5 and can be found attached to this document. The SCR covers the current and proposed areas of the operation.

3.1.5 The land under the applicants control extends beyond the site in all directions as can be seen on **Drawing Reference Number CWM1001/5/02.** The area of proposed extension includes the concreted area to the south of the current RWMRF building. The revised Environmental Permit boundary (and corresponding area covered by the Site Condition Report submitted in support of this application) is illustrated by the green boundary line on **Drawing Reference CWM1001/5/02.**

3.1.6 The proposed area of the permit boundary extension is to be developed out into an area of impermeable hardstanding (with relevant drainage arrangements) which will accommodate an extension of the current RWMRF building for the storage (and wrapping) of baled RDF materials. The rationale behind the extension is for the provision of additional internal space to facilitate make improvements to the site layout and to provide increased operational flexibility.

3.1.7 The Proposed Indicative Operational Layout is provided at **Drawing Reference Number CWM1001/5/03** which illustrates both the current operational areas and those subject to the extension to the Environmental Permit Boundary.

3.2 Risk Assessment

3.2.1 As is required by Form EPC Part C2 General 'Varying a bespoke permit', Question 6 requires an assessment of risk to the environment of the operation. There will be no change to the operations at the site other than the facility covering a wider footprint (and removal of the WTS and RDF pre-treatment limit for the purpose of recovery). Notwithstanding the fact that the changes are minor in nature from those which are already permitted and will reduce the potential environmental risks, it has been advised by NRW that this application is classed as 'Normal', a view to which the applicant and their agent dispute. A review and update of a Fugitive Emissions Risk Assessment for the site has been undertaken where appropriate and is included in **Appendix 4.** In addition to this, as a result of the proposed variation, the Accidents Risks for the amended operations have also been considered and are included in **Appendix 5.**

3.2.2 The nature of this application, discussed above is such that the proposed variation is considered 'Normal' in nature (as recommended by the regulator). This suggests that a considerable level of review is required by the Regulator in order to fully risk assess and determine this application. As previously discussed, both Stratus and the operator are in disagreement with this decision by the regulator and therefore fee abatement with regards to this application has been requested.

3.2.3 The variation includes for the extension of the site's permit boundary to encompass a larger area of land to the south. There are no changes to the overall operations within the extension area from those which are currently undertaken. In addition to this, the operator has also requested that the pre-treatment of waste for incineration or co-incineration for the purposes of recovery (in relation to the WTS and RDF processing facility) no longer be limited to 75 tonnes per day. All operations are already covered under activities listed within the existing Environmental Permit. The operations in this extension area will be undertaken with the suitable engineered controls extended and to be in place where required, and that are proportional to the risk posed. It is considered therefore, that there are no risks to the environment over and above what had already been considered in the original application and the updated general risk assessment documents provided as part of this variation application. Indeed potential risks can be considered to have been reduced.

4.0 CONCLUSIONS

4.1.1 Following on from a request by CWM Environmental Limited (CWM) for Nantycaws Residual Waste 'Dirty' Materials Recycling Facility (RWMRF), this application seeks to vary the aforementioned permit to account for extension to the permit boundary to incorporate a larger area of land to the south of the site. Further to this, CWM require the removal of the specified daily limit (75 tonnes) for the pre-treatment of waste for incineration or co-incineration for the purpose of recovery (in relation to the WTS and RDF facility) to be removed from the permit. The amendments are considered by NRW to be 'Normal' in nature in line with NRW guidance; however the operator has requested fee abatement with regards to this application. As is required with any Permit boundary extension, a Site Condition Report (SCR) has been prepared and has considered the pre-existing ground conditions both within current and proposed areas of operations.

4.1.2 This documentation along with its supporting drawings and appendices, and Site Condition Report provides the required level of information to enable determination of the application to be made.