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Your Ref: PAN-001317

Our Ref: 2858/L/003

5th May 2017

Ms Louise Bailey
Natural Resources Wales
Permitting Service
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Dear Ms Bailey,

Gwynedd Skip & Plant Hire Ltd – Permit Variation Application (ref: EPR/CB3237AP/V002) – Response to Schedule 5 Request for Further Information.

We are writing on behalf of Gwynedd Skip & Plant Hire Limited in response to your letter dated 13th April 2017 and accompanying Schedule 5 Notice (ref: EPR/CB3237AP/V002) requesting further information to support the variation application for the Lon Hen Felin site located at Caernarfon, Gwynedd.

We will review each of Natural Resources Wales' (NRW) comments and requests in the order received on the Schedule 5 notice and respond accordingly. This response should be read in conjunction with the NRW Schedule 5 notice as only the specific questions have been replicated for reference purposes and not the accompanying text.

A. Production of waste derived fuels

Refuse derived fuels (RDF) is waste that has been produced to a specific standard required by the end user. This includes technical specifications such as the calorific value, the moisture content, the form and quantity of the RDF. From the information within this application it does not seem that you are making RDF, but are baling residual wastes to create a waste derived fuel, and we shall use this term rather than RDF to describe this.

Questions:

- 1. Where on site is the waste derived fuels being made?***
- 2. Are the waste derived fuels being wrapped or just baled? These are separate treatments***
- 3. What waste codes/types will the waste derived fuels contain?***

We would like to clarify that the definition of Refuse Derived Fuel (RDF) is a generic term used for the description of all wastes recovered as fuels, therefore it is unclear why the term 'Waste Derived Fuel' has been used within this notice. We would confirm that any specific

standards to be achieved will be determined by the end receiver of this product and it will be the responsibility of the operator to achieve these standards as and when required.

The incoming materials contributing to the production of RDF will be deposited, shredded and stored in loose form within the operations building prior to off-site transfer for recovery. At this stage there are no proposals for the baling or wrapping of this material. The site operates a manual sorting and processing system and any non-recyclable, combustible material will be input to the Waste Derived Fuel production process, however, this will be dictated by the receiving facility of the material.

B. WEEE

4. Do you intend to carry out any treatment of WEEE on site? If yes, please state what treatment, and where this will be carried out.

We can confirm that the operator does not intend to treat WEEE as part of the operations at site. Any residual electronic equipment recovered from incoming skip wastes will be stored within a secured container prior to removal from site.

C. Site infrastructure

Sections 7.5.2 and 8.1.2 of your Technical Standards states the outside yard area as “impermeable hardstanding / concrete hardstanding”.

We consider hardstanding to be permeable. The default wording we use within our permits for hazardous and non-hazardous waste is as follows: “All hazardous and non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage”.

Question:

5. Please confirm if the yard area is either:

- a. an impermeable surface with sealed drainage; or***
- b. a permeable surface where water can freely drain though***

We can confirm that the yard which forms the external operations area consists of a concreted impermeable surface benefitting from sealed drainage as detailed on the permit application drawing referenced 2889-CAU-XX-00-DR-6001 and shown on the Site Layout Plan (ref: 2858/1/002).

D. Storage of wastes

Your site plan and Technical Standards document (section 6.5) detail the storage locations and methods for several wastes, however there are some higher risk wastes that are not detailed including (but not limited to) tyres, WEEE, gas in pressurised containers, batteries, biodegradable kitchen and canteen waste.

Question:

6. Where and how will these wastes be stored?

The items specified above will typically only be found in residual form within incoming skip wastes. Tyres are stored within a designated skip adjacent to the quarantine area of site. Additionally, items consisting of WEE, pressurised cylinders and lead-acid batteries will also be stored in designated secure, enclosed skips adjacent to the quarantine area prior to removal from site to a suitably permitted facility.

The existing permit allows for the receipt of biodegradable kitchen and canteen waste as per the EWC list within the Standard Rules Permit (ref: SR2008No7_75kte), however, the operator does not currently retain any collection contracts for this type of waste so therefore no additional provision has been made for its designated storage. Should any residual waste of this description be received as part of the incoming C & I wastes, these will be stored within the operations build as detailed in the accompanying Odour Management Plan (ref: 2858/R/004/01, OMP).

E. Risk Assessment and Odour Management Plan

The odour section of your risk assessment does not meet our H4 Odour Management guidance for an Odour Management Plan. It should identify:

- Source materials (including specific waste types)***
- Releases***
- Impacts***
- General measures***
- Monitoring***
- Process***
- Emissions***
- Contingency control measures***
- Incidents and emergencies***

See Appendix 4 of the Environment Agency's H4 guidance for further information
Question

7. Please submit a dedicated Odour Management Plan that covers the above points

A dedicated Odour Management Plan (ref: 2858/R/004/1, OMP) has been compiled for the site operations as requested and accompanies this response.

We trust that the points and comments contained within this letter adequately address the NRW comments and observations in relation to the Gwynedd Skip & Plant Hire Ltd variation application and would request that you contact us if you require further clarification on the matters discussed within this letter.

Yours sincerely
For and on behalf of TerraConsult Ltd



Robert Barlow
Senior Waste Regulation Consultant
