

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2010

Notice requiring further information

To: Company Secretary
Halfway House
Pope Hill
Haverfordwest
SA62 3NX

Application number: EPR/LB3930AT/V003

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated **29/07/14**.

The information requested should be sent to the following address by **6th July 2015**.

Information should be sent to:

Permitting Service (Cardiff)
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Louise Wild	08/06/2015

Authorised on behalf of Natural Resources Wales

Schedule

Unfortunately we need more information from you before we can continue working on your application.

Proposed Composting Activity:

1. Daily treatment capacity

The Industrial Emissions Directive (IED) came into force in 2013; this has had some impact on the Environmental Permitting Regulations (EPR) and affects the legal limits for some waste facilities, and in particular composting sites as they carry out “biological treatment” of waste.

A legal treatment limit of 75 tonnes per day now applies for waste facilities carrying out a Section 5.4 activity. For sites with a daily treatment capacity exceeding 75 tonnes they now become “installations”.

For your information, please see the following amendment to Section 5.4 of the Environmental Permitting Regulations:

SECTION 5.4 Disposal, recovery or a mix of disposal and recovery of non-hazardous waste Part A(1)

(b) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—

(i) biological treatment;

(ii) pre-treatment of waste for incineration or co-incineration;

(iii) treatment of slags and ashes;

(iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.”

The treatment capacity is calculated in accordance with our guidance RGN 2 – understanding the meaning of a regulated facility, Appendix 1, A2.6.

“A2.6 For batch processes which take more than a day to complete, and where the listed activity specifies a daily rate, the rate should be taken as the amount of material handled divided by the number of days or parts of days over which treatment (i.e. for the batch) takes place.”

Ffôn/Tel 0300 065 4505

Ffacs/Fax 0300 065 3001

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Gwasanaeth Trwyddedu (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP

Permitting Service (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg

www.naturalresourceswales.gov.uk

Correspondence welcomed in Welsh and English

ACTION: To enable us to calculate the sites daily treatment capacity and ascertain whether the site is a waste facility or an installation, please provide the following information:

1. The number of windrows that the site will be able to accommodate depending on the size of the pad. This is not the number of windrows that you intend on having but the number that could fit onto the composting pad (allowing for suitable distances in between the windrows).
2. The minimum number of days that it takes to complete the composting cycle. This is from the day that the batch of waste is put into windrows to begin the sanitisation, including the stabilisation and maturation phases, until the compost reaches PAS 100 or it is deemed as end of waste.
3. Windrow height (of all windrows).
4. Windrow width (of all windrows).
5. Windrow width at the top (of all windrows).
6. Windrow length (of all windrows).

ACTION: To enable us to calculate the sites daily treatment capacity on the actual amount of waste you intend to treat, please provide the following information:

1. The number of windrows that will be present on site for the sanitisation and stabilisation phase.
2. The minimum number of days that it takes to complete the sanitisation and stabilisation phase.
3. The number of windrows that will be present on site for the maturation phase.
4. The minimum number of days that it takes to complete the maturation phase.
5. Windrow height (of all windrows).
6. Windrow width (of all windrows).
7. Windrow width at the top (of all windrows).
8. Windrow length (of all windrows).
9. Details of the physical measures used on site to ensure that the daily treatment amount will not exceed 75 tonnes per day and therefore operate as a waste facility and not an IED installation.

2. Site specific bioaerosol risk assessment

Ffôn/Tel 0300 065 4505

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In accordance with our position statement on “Composting and potential health effects from bioaerosols: our interim guidance for permit applicants”, if your site is within 250m of sensitive receptors, you must submit a site specific bioaerosol risk assessment. Please confirm if you are within 250m of sensitive receptors and if you will be processing over 500 tonnes of biodegradable waste at any one time. If you will be processing over 500 tonnes at any one time please submit a **quantitative** risk assessment. If you will be processing less than 500 tonnes of biodegradable waste at any one time, please submit a **qualitative** risk assessment.

Detailed site layout plan & location plan:

3. Please provide a detailed site plan showing the area where the different activities will be located. That is, the open windrow composting area, dewatering gully wastes area, where the manufacture of soils will be, where the wood waste processing area will be and the inert and excavation waste transfer station area.
4. Please provide a second plan showing the location of the site and include the nearest sensitive receptors to the site. From completing map searches on our systems, it appears that there are properties much closer to the boundary of the site than the one residential property identified as approximately 0.3 km north of the site in section 6.0 Sensitive Receptors of your Odour Management Plan. The exact distance needs to be recorded as this will impact whether or not you need to provide a qualitative or quantitative site specific bioaerosol risk assessment (if you have more than 500 tonnes of compost at any one time). As detailed above.

Waste Classification: Guidance on the classification and assessment of waste (1st edition 2015):

5. From the recently published Waste Classification guidance document (titled above) please provide separate lists of wastes for each the proposed waste activities on site. You've provided a list of input materials for the open windrow composting activity in your Compost Quality Management System (CQMS) document and therefore you do not need to reproduce this list for the composting activity (provided this is accurate?)

Drainage on site:

6. Please provide details of the drainage at site in the form of a drainage plan and further written details regarding any sealed drainage/interceptors you are/not proposing to have installed on site. This is required to take account of the increased area applied for as part of this variation application.

If you have any queries or concerns regarding this notice and the requests for information, please feel free to call at any time.

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