

29th February 2016

Permit Receipt Centre (Cardiff)
Natural Resources Wales
29 Newport Road
Cambria House
Cardiff
CF24 0TP

Dear Sir/Madam,

Environmental Permit – Normal Variation: Permit Number EPR/HP3938RN
Fenestration Recycling Company Ltd (t/a The National Window Recycling Company) – Neath Abbey
Wharf, Skewen, Neath, SA10 6BL

Please find enclosed our application for a Normal Variation to the above Tier 3 Bespoke Environmental Permit. Please note that due to an error when issuing a previous transfer this permit is in places incorrectly referenced within NRW under permit number EPR/HB3938RN.

The purpose of this application is:

- To add physical treatment activities for the purpose of recovery to the currently permitted activities;
- To increase the area of the permitted site;
- To add EWC codes to the list of accepted wastes for wastes similar to those already permitted onsite;
- To increase the tonnage of wastes permitted to be stored on-site; and
- To consolidate the permit to a modern permit template and conditions.

As post-WTS additions this variation does not seek to increase the tonnage of incoming waste above the 24,999 tonnes per annum approved in the current permit.

The information attached comprises the formal EP variation documentation, the contents of which are summarised below. As specified in the guidance documents, 3 hardcopies of all documents and a CD containing electronic versions are included.

Environmental Permit Application Forms

Part A, C2, C4 and F1 have been completed in line with Natural Resources Wales's guidance.

Operational Risk Appraisal (OPRA)

A variation fee of £6,811 has been calculated and a completed OPRA profile detailing the operator's systems and competency in support of this has been submitted for both the existing and proposed operations.

Payment of the variation fee has been made by BACS. Details are included in Form F1 and confirmation of payment accompanies the application.

**Environmental Risk Assessment (ERA)**

An Environmental Risk Assessment (ERA) accompanies this application.

The ERA demonstrates that the proposed facility does not present a significant risk to the environment. In this respect the operational proposals will manage/control any potential risks that should arise by implementing good management practices.

Site Condition Report

As the application includes an extension to the currently permitted area the application includes a Site Condition Report describing the current condition of the site. This includes an Envirocheck desk study, Environmental Report and Site Photographic Record.

Environmental Management System (EMS)

The facility will be managed to minimise any impacts on the environment. The company proposes to use its own internal Environmental Management System to manage any risk.

The EMS includes a Management System Plan that describes the proposed operations and details proposals to manage/control any potential risks that should arise through site design and implementation of good management practices. It also includes a Site Emergency Plan that identifies environmental hazardous that could arise and the steps to be taken by the operator in the event of such an incident.

The Environmental Management System is a live document that is reviewed and updated regularly and will be maintained for the lifetime of the facility.

The Environmental Management System is an extensive document and for the purposes of providing information to support this application, only the contents page, Management System Plan, Noise Management Plan and Fire Prevention and Mitigation Plan have been submitted.

Drawings and Plans

A number of drawings and plans accompany this application (document SD4a). Three additional plans have been submitted (in document SD4b) to highlight proposals made by the Operator in the Environmental Management System Plan and Fire Prevention Plan to make improvements to the site's existing drainage and storage arrangements. Subject to these being approved by NRW, the Operator will agree timescales with NRW for these changes to be implemented.

I trust the above information meets with your requirements, however should you wish to discuss or clarify these issues we will be happy to provide additional information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Stephen Hemmings", with a stylized flourish at the end.

Stephen Hemmings
Director

Enc: 3 hard copies and 1 CD