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24th June 2015

Dear Louise

Further to your letter of the 27th May 2015 I am able to provide you with the following information in relation to your questions 1 to 7 within the Schedule 5 Notice, question 8 having been responded to previously:

1) I have attempted to separate the processes out into two different activities as you suggest but it appears to me that the fuel production from wood waste will not really fit in with the RDF/SRF production process. I should point out that the wood processing has not yet started at the facility and neither has the briquette manufacture. In fact these may never be undertaken but the operator would like to be able to process these materials and undertake these processes in the future if they wish to do so. I have therefore provided three separate process diagrams which show the system, I hope, more clearly. I attach them to this letter.

   I have taken as my guide the documents entitled Industrial Emissions Directive – Information Sheet 2 dated 7th February 2014 and the Environment Agency's RRPS 176. I realize that these documents may not be directly applicable in Wales but they appear to be useful sources.

   What I may not have made clear is that the site is primarily a mechanical waste treatment facility which separates waste in order to recover recyclables. The way this is done varies depending upon the waste. The residual waste may be sent to landfill (as is always the case of the fines which are processed at the facility) or may be baled for use as a fuel. The process does at times include shredding. The site does not dry waste in any sort of heated or passive system.

   The initial treatment of waste is therefore simply for recovery and most of the waste which arrives at the facility goes through this system. (There are some minor exceptions such as high quality confidential waste paper which is simply shredded on a small scale, stored within the building and then sent on for recycling). Waste which had gone

through the treatment process may then be baled or shredded and baled and, possibly in the future, may be made into briquettes for onward transportation purposes. Theses final processes do not change the composition of the waste in a way that changes one or more of the following parameters :

a) calorific or heating value

b) moisture content

c) ash content

d) chemical composition

e) heavy metal content.

The size reduction will assist the handling of the fuel but its primary purpose is not for the purposes of improving its combustion characteristics. Similarly baling will assist in the handling of the fuel but is not primarily for the purpose of improving its combustion characteristics. Ferrous and non ferrous metals will be removed by the recycling process but 'heavy metal' content will not be affected. My understanding is that this reference is related to the heavy metal content of the material to be burnt and the resultant emissions or residues of substances such as cadmium, mercury, arsenic, zinc etc. Processed at the plant will have no impact on these metals and they should not be in the waste stream at all, at any stage.

However, the primary purpose of the wood processing (should it ever take place at the site) is to make fuel. Metal such a ferrous nails etc will be removed during the treatment processes and other contaminants such as any paper or plastic will be removed but the purpose of the processing is to create a fuel.

Therefore, it appears to me, that there are potentially two processes which could fall into the IED category; the shredding and/or baling of residual waste at the end of the general recycling process and the production of wood fuel/biomass.

The first process appears to be similar to that described in Figure 7 of the Information sheet 2. The intention of the treatment process is to recover glass, paper, plastics and metals with the residues being burnt in an EfW plant, so the overall process is considered to be recovery. The processing is not there to achieve any of the above criteria (a-e). Metals may be removed but not for the purposes of reducing the heavy metal content of the RDF/SRF but for the purposes of recycling of metals.

In any event the process ie pre-treatment of waste for incineration or co-incineration, would not have a capacity exceeding 75 tonnes per day. In addition no more than 50 tonnes per day would be treated for disposal. I suggest that these capacities should be limited by regulation within the permit. In addition the capacity of the facility is limited by the capacity of the plant.

Similarly the wood fuel/biomass process will be limited by the capacity of the plant and can be limited by regulation of the facility within the permit to less than 75 tonnes per day.

In part 1(a) of the Schedule the waste transfer activities are correctly described.

In part 1(b) the RDF/SRF production; please note that not all the activities you describe are done at present but the operator would like to be permitted to undertake them as these may become part of operations in the future.

All the activities you describe, including blending but excluding drying, could potentially be undertaken although at present none are done to achieve a particular specification.

However, the capacity limits above would still apply.

In terms of the fines these do not go into RDF/SRF production but are simply processed to remove any materials which can be recycled and then the remainder is sent to landfill.

2) Waste paper is shredded as part of the transfer station activities.

3) Waste paper, cardboard, plastics and textiles are baled as part of the transfer station activities.

4) Drying does not take place at the site.

5) In terms of capacity please see comments above.

6) The mixed packaging could include metals but again please see comments above regarding metals and also capacity.

7) Any baled and wrapped RDF (19 12 10) would be broken apart to see if further recyclates can be removed from the RDF. Similarly (19 12 12) usually comes in unbaled and is processed to see if further recyclates can be removed from the waste. I would suggest therefore that both activities are in the waste transfer station activities.

8) This has been addressed in my previous letter.

I trust that these comments clarify the activities at the site. Please do not hesitate to contact me should you need anything further.

Sincerely,

Clare Walters

Director