

Mrs. Anita Manns
Mott MacDonald
Mountbatten House
Grosvenor Square
Southampton
SO15 2JU

**Our ref: PAN-016430
Other ref: EPR/ZP3032KQ**

Date: 29 March 2022

Via e-mail to: Anita.Manns@mottmac.com
cc: james.camis@dwrcymru.com

Dear Mrs. Manns,

We need more information about your application

Application reference: PAN-016430

Operator: Dwr Cymru Cyfyngedig

**Facility: Afan Combined Heat and Power Facility, Afan Wastewater Treatment Works
Harbour Road, Phoenix Walk, Port Talbot Steelworks, Port Talbot, SA13 1RA**

Thank you for your application received on 21 December 2021. Unfortunately, we need to ask you for some more details before we can consider duly making your application. The additional information required is summarised below.

Incomplete / Incorrect Application Forms, Opra Profile and Application Fee

- Please re-submit Application Form Part C2 completing Questions 5a and Appendix 5 of the form and submit the supporting documents referenced.
- Declaration in Question 7d of Part F1 form must be signed *and* dated.
- We have been unable to find evidence of payment of application fee. Please confirm if payment was made; the date payment was made; account name the money was sent from; and amount paid.
- It is not clear how the application fee has been calculated. There is a discrepancy between the Opra Score stated within the Opra Profile provided (Score of 25), and the Opra score stated within Part F1 of the application forms (Score of 42). Please clarify the Opra score for the site. The Opra Profile submitted also appears to contain errors. Please review and re-submit an updated Opra profile.
- In accordance with our Charging Scheme, (where an operator seeks to add a different category of facility), the appropriate application charging multiplier for a new bespoke installation application is required rather than the substantial variation multiplier. Please provide an updated Part F1 form to reflect this and submit additional fees accordingly.

Ebost/Email Lucinda.hall@cyfoethnaturiolcymru.gov.uk
Lucinda.hall@naturalresourceswales.gov.uk

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP
Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Risk Assessments

- The Environmental Risk Assessment (ERA) submitted as part of the supporting information does not consider all potential hazards/risks associated with the site. Hazards/risks that are not sufficiently covered include odour and noise emissions, emergency scenarios and loss of containment. The ERA should consider hazards and risks from the site as a whole (i.e. the combined risk of existing and new activities to be permitted). Please provide an updated ERA which follows our H1 guidance, and provide a quantitative odour impact assessment (odour modelling) in line with H4 Odour Management guidance: [How to comply \(publishing.service.gov.uk\)](https://publishing.service.gov.uk). Additional information must be provided on odour abatement installed on site, in order to demonstrate how emissions from these units will not cause harm to the Environment or harm to Human Health.
- Please provide an accurate and complete inventory for all point source emissions to air. This comprehensive inventory should include point source emissions already permitted as well as all additional emissions to air through any kind of duct, pipe, stack, vent, louvre etc. to be added to the permit. This must include all points from process and storage tank(s), odour abatement unit(s), combustion sources, biogas holder(s), gas scrubbing system(s), flare(s), and any other sources as applicable. The inventory should be provided as follows (example shown in red) and the emission point numbers should match those as labelled on the site plan:

| Emission point (number) | Source (including any abatement) | Parameter | Quantity (including unit) |
|---|---------------------------------------|---------------------------|-----------------------------|
| <i>A1 [Point 4 as shown on site plan]</i> | <i>CHP engine stack (X abatement)</i> | <i>Oxides of nitrogen</i> | <i>500 mg/m³</i> |
| | | | |
| | | | |

- For passive emission points such as tank breather vents and pressure relief valves, it is sufficient to identify the release point, source, and any abatement. Please briefly explain how during normal operations emissions from these points would be negligible from these sources.

Operating Techniques & Monitoring Plans

- Please provide technical description of the AD plant, including process parameters such as plant retention time, Organic Loading Rate (OLR), operating envelope including digester temperature, etc. (See reference to BATc 38 below).
- Please confirm the daily throughput capacity for the site. Within the supporting documentation you have submitted, you have indicated a daily throughput of 60 tonnes per day, yet at the same time have requested an installation activity for >100 tonnes per day throughput. Your daily throughput capacity should be calculated using methodology described within RGN02 Understanding the meaning of Regulated Facility (Appendix 2).
- A technical description and plant information should also be provided in relation to the odour abatement units installed on site, including their technical design, size, operating envelop, loading capacities, the sources of odour that they treat, etc.
- Please provide details of your proposed monitoring regime including monitoring frequencies.

Management Plans

- Please submit an Accident Management Plan for the site.

Drawings

- Provide detailed Process and Instrumentation Diagrams (P&IDs) for the site.
- Provide a Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) assessment for the site, including associated DSEAR Zoning plan.

Site Condition Report

- The Site Condition Report submitted has not identified 'relevant hazardous substances'. The SCR report should identify 'Relevant Hazardous Substances (RHS)' substances' (as defined in Article 3(18) of the Industrial Emissions Directive) by giving consideration of the chemical and physical properties of each hazardous substance [composition, solubility, toxicity, mobility, physical state (solid, liquid or gas)] and determine whether any of these substances can cause soil and/or groundwater contamination.
- If you consider the proposed new activity involves the use, production, or release of 'relevant hazardous substances' (as defined in Article 3(18) of the Industrial Emissions Directive), complete a risk assessment considering the possibility of soil and groundwater risk contamination at the installation with these substances. Use the European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions when carrying out your risk assessment: [EUR-Lex - 52014XC0506\(01\) - EN - EUR-Lex \(europa.eu\)](#)
- Where any risk of such contamination is established from risk assessment above please prepare and submit a baseline report containing information necessary to determine the current state of soil and groundwater contamination (i.e., baseline monitoring data). If you chose not to submit any monitoring data, you should provide a justification for not doing so in your report. In this case you will be accepting the risk that you may be required to clean up pre-existing contamination when you surrender your permit. The baseline report can be included within Section 3.0 of your Site Condition Report. See Section 3.0 of the following guidance for more detail: [Microsoft Word - H5 SCR guide for applicants v2 0 4 August 2008.doc \(publishing.service.gov.uk\)](#).

Best Available Techniques (BAT) Assessment

- Please clarify how your site complies with the Medium Combustion Plant Directive (MCPD) and confirm whether all MCPs on site are defined as existing, or whether there are any new MCPs. Provide a justification if you believe the MCPD does not apply.
- Clarify if the Specified Generator Regulations apply to any plant, if so confirm whether Tranche A or Tranche B. Provide a justification if you believe the regulations do not apply.
- You have provided a BAT assessment in an excel format, which contains references to operational documentation as evidence of compliance with BAT. However, the evidenced documentation listed has not been submitted in support of this application. NRW are thus unable to access these documents to determine if operations do/do not comply with BAT. Please submit all documentation evidenced within your BAT assessment. If documentation has previously been provided to NRW, please state the date of submission, along with document date and version number to ensure the correct documents are identified. Your BAT assessment must provide justification for your equipment choice, including abatement technology installed on site. In particular please address the following BAT Conclusions, as described within the Waste Treatment BREF (EU 2019):
 - **BAT Conclusion 8 – Monitoring emissions to air**
Provide a detailed justification as to how you plan to or currently comply with the requirements of this BAT conclusion
 - **BAT Conclusion 14 – reduce diffuse emissions to air**
Provide a detailed justification as to how you plan to or currently comply with

the requirements of this BAT conclusion. BAT14 is not related to compliance with CIRIA C736 as indicated in your application it refers to control of diffuse emissions to air.

- **BAT Conclusion 19 – Optimize water consumption and reduce emissions to soil and water**

Provide a detailed justification as to how you plan to or currently comply with the requirements of this BAT conclusion. BAT19 is related to compliance with CIRIA C736, however not entirely. Please confirm if any of the other techniques listed in BAT19 are employed or plan to be employed such as BAT19(a), (b) and (e). See further requirements below regarding containment and CIRIA C736.

- **BAT Conclusion 34 – Channeled emissions to air**

Confirm which abatement techniques are used and provide a detailed justification as to how these techniques ensure an appropriate level of environmental protection.

Confirm which point source emissions to air (if any) are subject to BAT-AELs as stated in BAT Conclusion 34.

If relevant, confirm which BAT-AEL and monitoring you prefer as per the footnote 1 there is a choice between BAT-AEL for NH₃ and odour. If applicable, provide evidence you can achieve the BAT-AEL.

- **BAT Conclusion 38 –Emissions to air**

Provide detailed justification as to how you monitor overall environmental performance of the AD plant and confirm which process parameters are monitored to ensure an appropriate level of environmental protection.

CIRIA C736

- Your application and supporting documentation does not provide sufficient detail on secondary containment. We need to assess your current or proposed containment measures against recognised standards.
- Provide a full risk assessment of all primary, secondary, and tertiary (where applicable) containment measures on-site where potentially polluting liquids are being stored. The risk assessment and measures should be produced in line with the recognised AD industry standard developed in-line with the CIRIA C736 (2014) guidelines and 'How to comply with your environmental permit (2014)'. Risk assessment should include:
 - a complete and accurate inventory of all containment measures, including but not limited to all storage and treatment tanks, pipework, chemical reagent storage vessels and bunds.
 - details of capacity of primary containment and any proposed secondary and tertiary containment measures.
 - any proposed improvements to ensure compliance with the above standards and dates for implementation.
- Provide details of the construction design of any containment in-line with the CIRIA C736 guidelines.
- Provide and justify the planned inspection and maintenance programme for any impermeable surfaces, sealed drainage, and containment measures.

If you need advice about the above information requested, or work out what your fee is, please contact your local area office. Call 0300 065 3000 and ask to speak to your local area office or your site officer.

Please reply within 10 working days from the date of this letter. If we don't hear from you, we must return your application.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

If you email or write to us, please quote the application reference **PAN-016430** on any correspondence and send it to the relevant address below. If you have any questions, please email me at Lucinda.hall@naturalresourceswales.gov.uk.

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)
Permitting Consultant Installations and RSR Permitting Team

We would refer you to the following standard guidance, which may be relevant in reviewing your application:

<https://naturalresources.wales/permits-and-permissions/environmental-permits/regulatory-guidance-notes-rgns/?lang=en>

<https://naturalresources.wales/media/1224/rgn-4-setting-standards-for-environmental-protection.pdf>

<https://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>

<https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

<https://naturalresources.wales/permits-and-permissions/environmental-permits/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>

<https://naturalresources.wales/about-us/what-we-do/how-we-regulate-you/our-charges/?lang=en>

[Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](#)

[EUR-Lex - 32018D1147 - EN - EUR-Lex \(europa.eu\)](#)