

Abermule with Llandyssil community council

Cyngor cymuned abermiwl gyda llandyssil

# Gwilym Rippon

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# **Chair / Cadeir**

## Jane Rees

*Your Ref:*

*Our Ref: GJR02/06/21*

Mr. H. Davies

Permitting Team Leader (Waste)

Cambria House

29 Newport Road

Cardiff

CF24 0TP

24th June 2021

PAN 013001 Consultation response.

Dear Mr. Davies

Abermule with Llandyssil Community Council **strongly** object to this application, particularly the request to handle municipal and AHP waste on the following grounds:

1. Planning not granted.

The Community of Abermule strongly opposed the hybrid application P/2018/0587 for a Recycling bulking facility and outline application for erection of business units on Abermule Business Park. This application was approved in June 2018 for household curb side collections of Food waste, paper, card, glass, plastic and tin for bulking and onward transfer. Our Community, the Community Council, Powys County Council Councillors, their Planning Committee and Cabinet were all assured residual waste would not be brought to the Abermule site. **A Commercial and Industrial waste transfer station required to handle municipal and AHP waste has not been granted planning permission.**

1. Odour Impact Assessment.

There is something fundamentally wrong with the conclusion of the Odour impact assessment. **Although the report mentions in several places that a conservative approach has been taken, the output of the model presented in section 7 of the report is astonishing, in that the results of the dispersion model is almost concentric around the centre of the site.** It is beyond our technical knowledge to understand why this is the case, but we offer the following as possible reasons:

1. As an input to the model, the building has been transformed into a square model of equivalent surface area. We fail to see how this can be representative of 5 large fans blowing contaminated air directly towards the village and the adjacent business units.
2. The units of odour levels used are for a 98th percentile which means that the limit cannot be exceeded for more than 2% of the time (175 hours in one year). The Wind rose data submitted indicates that there is a substantial South Westerly wind for between 9% and 13% of the time over the 5 years measured, with an average of 11%. The worst case wind levels should therefore be used from a SW direction only, as 11% is much greater than the 2% time allowed.
3. The report mentions a collated volume source across 24 hours as being worst case. How can this possibly be true when 3 times the odour concentration will be ejected when the fans are on during the day?
4. The Calculation of airflow from the building is based upon an air change of 1.5 /hr resulting in a flow rate of 1.264 m3/s or 4550 m3/hr per fan. The fans fitted to the building are 800mm diameter and a cursory scan of the internet suggests that 800mm fans are mostly capable of shifting in excess of 20,000 m3/hr and even up to 33,000m3/hr, more than 7 times the value claimed in the application. **As the fans have been installed and therefore their specification known, let’s see the actual flow rates of the fans used in the calculations**. In a document cited in the report (Ref 10), an airflow of 131 m3/s was calculated for a building without ventilation fans, and so there are other factors to take into account aside from the fan flow rates. In another paper we have read (1), levels as high as 44,000 OU/s have been estimated at the source of the pollution.
5. **The level of Odour estimated within the building is totally misrepresentative of reality.** It states in the report that under ‘Normal Operating Conditions’ waste will not be present for more than 5 days, but there are no guarantees. Given our experience of the efficiency of PCC operations we know that this will not be adhered to. The current collection cycle for municipal waste in Powys is every 3 weeks; the report fails to mention this important fact. The report has used figures measured from a representative site, but the report also indicates that the measurements were made in September, when there is only 12 hours of daylight. You do not incubate an egg by turning the power off for 50% of the time. The document cited in the report (Ref 10) also indicates that the temperature at the time the measurements were taken was only 16°C, and as the readings were taken in September the nights would have been much colder. To meet the 98th Percentile criteria, measurements must be made of municipal waste collected at 3 week intervals at the end of June when the daylight hours are at maximum. In fact, we would go as far as to say that these measurements should be made during a prolonged hot period as these will become far more regular with the onset of global warming. The document cited (Ref 10) was written in 1999, 22 years ago. Surely PCC can come up with some more recent data to be used as inputs to their model?
6. The units used for the output of the dispersion model are average units over a 1 hour period. The document cited (Ref 10) in the report clearly indicates that these are not suitable units when considering odour concentration levels as the peaks and troughs are averaged out. The cited document indicates that units averaged over a 3 minute period are more suitable and that concentration levels can be almost twice that of the units averaged over 1 hour. Another paper that we have read (1) they indicate that *it is well known, however, that for dispersion modelling of odours, the Gaussian model is inappropriate because it gives only hourly averaged concentrations, whilst the human response time for the detection of odour is typically of the order of 1 s.*

Powys County Council approved their own application to develop business units adjacent and downwind of the recycling facility, but there is no mention of the impact on these in the report, and they have not been included in the Building profile input programme to the model. In the note in table 6.3 of the report it states that the *immediate vicinity surrounding the site is rural,* which is totally misleading. The nearest Business units are less than 28m from the fans expelling air from the Recycling facility containing high OU concentration levels of contaminated air.

The screening distance for SSSI’s is 2km. How can a high level source of odour being blown directly towards a village with a following wind possibly have levels down to the required urban limit within 100m as suggested by their model outputs (Section 7)? The results in the cited document (Ref 10) indicate that levels do not get down to the required levels until after 750m when using the more representative 3 minute average unit, and that is with an odour level measured in September! **There is either something seriously wrong with the model used, the way in which it has been used, or the data being fed into it.**

There is no mention in the report of how the model is going to be validated. In papers that we have read it is clear that the modelling of odour dispersion is very difficult and the results should **always** be validated.

In the Pre-application consultation report submitted for planning approval, PCC responded with the following regarding odour concerns: *In respect of odour, it is not expected that the site will give rise to any significant levels of odour as food waste will be transported to site in sealed containers, and then transferred on-site to sealed skips which are then taken off-site once full. There are no opportunities for any significant levels of odour to escape from the sealed skips* (section 5.2). In the Odour impact assessment there is only mention of sealed units for AHP waist, **which is contrary to the information provided in order to get planning consent.** For the food waste handling that does have planning approval, **we insist that conditions are put into the license that forces PCC to store the waist in sealed skips as indicated in order to get planning approval.**

1. J. Nicolas, F. Craffe, A.C. Romain Waste Management (2006), vol. 26, iss. 11, pp. 1259-1269 - Estimation of odour emission rate from landfill areas using the sniffing team method.
2. Fire Risk

In the Fire Prevention and mitigation plan it states that: *The site follows strict waste acceptance and rejection procedures to ensure that no non conforming material is accepted* (Section 2.2). However, in table 4-4 of the Risk assessment it states: *All* ***non-municipal*** *wastes will be subject to inspection and checking against the declaration on the waste transfer note*. So, though they indicate in the Fire Prevention plan that **all** waste will be strictly inspected, they are not going to bother checking **municipal** waste which will have a higher probability of containing non conforming material.

It is stated that the building has a UKAS accredited fire detection and alarm system with flame detectors along the two short sides of the building which will cover all storage areas. There are no heat or smoke detectors in the main storage areas, only in the office and welfare area at one end of the building. If any of these detectors is triggered, a fire alarm system will sound, **there are no automatic fire suppression systems installed, the only fire suppression devices are handheld!**

The mitigating factors given by PCC is that the building is very tall and cold air trapped by rising hot air around any ceiling mounted detectors would defeat the object of having them installed. They also state that the building is OPEN (FPMP 3.1). Yet in the ERA statement (Table 4-2) PCC state that the only time the roller shutter doors are open will be for the ingress/egress of vehicles. Of course the building is totally shut outside of working hours. **Therefore this building is appropriate to be considered under BAT and have a deluge fire suppression system fitted, with detectors below the likely cold-spot level.**

Otherwise, for up to 125 out of 168 hours per week the building is only partially covered by fire detection systems, none of which trigger automatic suppression systems, relying solely on small local fire stations.

**Thus we have a large sealed building unattended for up to 60 hours, in which are highly flammable materials, possibly containing combustion devices, that has inadequate detection systems and no fire suppression system.**

1. Pest Management plan

The original application for planning did not include municipal waste, AHP waste and green waist. Food waist was included, but the planning application indicated that food waste would be contained in sealed skips. The permit application includes all of the above mentioned waste categories and indicates that food waist will be tipped into a bay within the facility, not stored in sealed skips. Given that this facility is so close to a large village, the Pest Management Plan is totally inadequate. It requires that the site supervisor does not do much more than record sightings of pest infestation in the site diary! It will need to be a thick book.

As with the odour impact assessment, **we insist that conditions are put into the license that forces PCC to store food waist in sealed skips as indicated in order to get planning approval,** so as to reduce the risk of pest infestation.

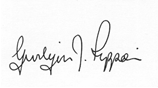
1. Data submitted.

A lot of the background data provided as part of the application are reports written before PCC decided to apply to handle municipal and AHP waste at the site and are therefore inadmissible as supporting evidence.

The above points raise serious concerns about risk of odour pollution and the risk of fire in the facility discharging toxic smoke across the village, the A483 major trunk road, and Cambrian Rail either side of the Bulk Recycling Facility, as has happened in the Midlands and other sites. Abermule is a large village with a number of residential estates, a school, a caravan park, and a public house with an outside beer garden, with the Rivers Severn and Mule in close proximity. All could be adversely affected by the horrifying prospect of several hundred villagers trapped by surrounding dense smoke being brought down on them by the prevailing winds, and such risks are totally unacceptable. Concerns are also raised about the adequacy of available fire tenders and distance to travel to the site. None of the local towns have fully manned fire stations and so attendance to such a toxic fire would inevitably be too slow to prevent sever health risks to village residents and employees working on the business site. The number of ambulances located locally is also a major concern; the scale of such a toxic fire would cause severe health issues before adequate cover could be provided to tend to people unable to breath.

The impact of contaminated odorous air being blown towards the village may not be dangerous but would bring an unpleasantness in the summer months that would be unbearable and would we feel lead to justified complaints at unprecedented levels.

Yours faithfully



Gwilym J.Rippon CiLCA (England and Wales)

Fellow od the SLCC, Cert He CEG

Clerk

To Abermule (with Llandyssil) Community Council