

**Notice of request for more information**

Environmental Permitting (England and  
Wales) Regulations 2016

## Notice requiring further information

**To:** Company Secretary  
Mekatek Limited  
MBG House, Unit C Maerdy Industrial Estate  
Rhymney  
Tredegar  
Gwent  
Wales  
NP22 5PY

**Application number: PAN-000868**

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, duly made on **29/01/2017**.

The information requested should be sent to the following address by **24/04/2017**.

**Information should be sent to:**

Alys Rook at [alys.rook@cyfoethnaturiolcymru.gov.uk](mailto:alys.rook@cyfoethnaturiolcymru.gov.uk)

| Name             | Date              |
|------------------|-------------------|
| <b>Alys Rook</b> | <b>03/04/2017</b> |

Authorised on behalf of Natural Resources Wales

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Gwefan/Website [www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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

# Schedule

## 1. Fire Prevention and Mitigation Plan

As noted in my email of 24/02/2017, the Fire Prevention and Mitigation Plan provided in the application (on 15/01/2017) does not meet Natural Resources Wales's current guidance, is very general, and does not provide adequate detail on the fire prevention and mitigation measures to be used at the site. As the plan is so general, with a large amount of text copied from guidance, we have not been able to carry out a proper assessment of the plan.

**ACTION:** Please provide a Fire Prevention and Mitigation Plan which fully meets our guidance (Fire prevention and mitigation plan guidance - Waste - Version 1, May 2016, available at <http://naturalresources.wales/media/678552/nrw-fire-prevention-guidance-2016v1.pdf>) and which contains all relevant site-specific information for the proposed activities. Please ensure that the plan addresses all relevant points, including, but not limited to, those detailed in my email of 24/02/2017.

## 2. Proposed activities; treatment types and list of waste codes for each activity

The application suggests that Mekatek Limited proposes to carry out the following types of waste operation/activity at the site:

- WEEE ATF (waste electrical and electronic equipment authorised treatment facility)
- Metal recycling site
- Household, commercial and industrial waste transfer station with treatment.
- Materials recycling facility

If this is not correct please let me know as soon as possible.

We need to know which waste types the applicant proposes to accept/treat for each waste operation/activity. Only one list of waste codes has been provided in the application and it is not clear which waste types the applicant proposes to accept for each proposed waste operation/activity. We also need to know which treatment activities are proposed for each waste operation/activity - this is not clear in the application. We also need to know how much waste is to be accepted per year for each proposed waste operation/activity.

### **ACTION:**

- a) Please provide a separate list of wastes to be accepted for each of the proposed waste operations/activities.
- b) Please provide a separate list of proposed treatment types for each of the proposed waste operations/activities.
- c) Please provide an annual throughput tonnage figure for each of the proposed waste operations/activities.

## 3. Location of activities within the site

It has been previously suggested that all waste will be stored and treated within a building, however, the site map in the application shows outdoor areas within the proposed permitted area.

**ACTION:**

- a) Please confirm whether or not all waste will be stored and treated within a building at all times.
- b) If any waste is to be stored and/or treated outside a building at any time, please specify exactly which waste(s) this applies to, and provide information on where, when and how this will be done.

**4. Acceptance and treatment of WEEE containing ozone-depleting substances**

The list of wastes in the application includes WEEE containing ozone-depleting substances (e.g. 16 02 11\* discarded equipment containing chlorofluorocarbons, HCFC, HFC; 20 01 23\* discarded equipment containing chlorofluorocarbons).

**ACTION:**

- a) Please confirm whether or not wastes containing ozone-depleting substances are to be accepted at the site.
- b) If they are to be accepted, please confirm whether or not any treatment of wastes containing ozone-depleting substances is proposed.
- c) If treatment of wastes containing ozone-depleting substances is proposed, please specify which treatments and provide details of how these treatments will be carried out. Depending on what the treatments are (if any), we may require further information on this.

**5. 24 hour operations and noise emissions**

Section 2.2.3 of the Environment Management System (EMS) Summary provided on 29/01/2017 states the following:

*“The normal hours of operation are between the following times: -*

*Monday to Friday: 24 hour operations*

*Saturday/Sunday: 07.30 hrs to 19.30 hrs*

*Bank holidays – no site operations except in cases of emergency where any emergency working arrangements will be agreed with NRW as they occur.”*

Some of the proposed activities have the potential to be noisy, in particular those such as metal shredding, which could impact on nearby receptors.

**ACTION:**

- a) Please confirm whether or not Mekatek Limited proposes to operate at the site 24 hours a day on weekdays.
- b) Please confirm at what times Mekatek Limited proposes to operate on weekends and bank holidays
- c) Please confirm at what times all potentially noisy activities will take place, including (but not limited to) various waste treatment activities, loading/unloading of waste and vehicle movements.

## **6. Noise and Vibration Management Plan**

There may be a significant risk of noise and/or vibration from the proposed activities (we do not understand the extent of this risk yet as we do not know the details of the proposed activities). Significant noise/vibration emissions are more likely if it is proposed to carry out the activities outside of a building, and they will have more impact on nearby receptors if it is proposed to operate during evenings, night times and weekends/bank holidays.

### **ACTION:**

- a) If the proposed activities are likely to give rise to noise and/or vibration, please provide a Noise and Vibration Management Plan which identifies the sources and risks of noise and vibration from the proposed activities, and details how the applicant will mitigate and manage these. The Noise and Vibration Management Plan may be a separate document, or may form part of the Environment Management System (EMS) Summary. (There is a section on Noise (Section 3.5) in the EMS Summary provided with the application, but we would require more detail and site-specific information than has been provided in this section.)

Further information on noise and vibration from waste operations and Noise and Vibration Management Plans is available in our document 'How to comply with your environmental permit' (available on our website at <http://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>), in particular on pages 47 and 48.

## **7. Odour Management Plan**

There is a risk of odour from the proposed waste types and activities (we do not understand the extent of this risk yet as we do not know the details of the proposed activities). We are aware that, during the duly making stage and following a request for an Odour Management Plan, some odour-producing wastes (such as food wastes) were removed from the application, and the section on odour in the EMS Summary was amended. This was accepted for the purposes of duly making the application. However, on further assessment of the application (including the list of wastes), and based on the information currently available to us, there is still a risk of odour, depending on the details of the proposed activities, how they are carried out and whether or not control/mitigation measures will be in place.

As previously discussed, and as stated in the OPRA profile, the applicant proposes to accept up to 499 tonnes per year of non-hazardous biodegradable wastes at the site, and the 'EWC List' provided in the application contains biodegradable wastes which may cause odour, depending on how they are stored and/or treated. For example, waste bark, cork, wood, paper, cardboard and other organic wastes have been included, which may be odour producing (especially if stored/treated in certain ways e.g. if they are stored in a way which will lead to decomposition). '19 12 10 combustible waste (refuse derived fuel)' has also been included in the 'EWC List', which is known to be potentially odorous. Other (non-biodegradable) wastes may also be odorous.

**ACTION:**

- a) Please provide an Odour Management Plan which identifies the sources and risks of odour, and which shows how the proposed operator will manage operations in a way that minimises the risks. This can be provided as a separate document, or incorporated into the EMS Summary for the site (more detail will be required than what is currently included in section 3.4 of the EMS Summary provided in the application). Alternatively, please provide full justification as to why an Odour Management Plan is not required, if you believe that this is the case.

Further information on odour from waste operations and Odour Management Plans is available in our document 'How to comply with your environmental permit' (available on our website at <http://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>), in particular on pages 45, 46 and 47. (Page 46 specifies that an Odour Management Plan is required for household, commercial and industrial waste transfer station activities, which is one of the activities proposed in this application.)

**8. Fugitive emissions and other risks from the proposed activities**

The proposed activities may give rise to fugitive emissions (we do not know yet if this is the case as we do not know the details of the proposed activities). The proposed activities may also pose other risks that have not been specifically mentioned in this notice.

**ACTION:**

- a) If the proposed activities are likely to give rise to fugitive emissions, please provide an Emissions Management Plan which identifies these risks and details how the applicant will manage and mitigate them. This can be provided as a separate document, or incorporated into the EMS Summary for the site.
- b) If the proposed activities present any other risks that are not specifically mentioned in this notice, please ensure that you provide adequate information on these risks and their management and mitigation. This can be done as part of the EMS Summary or in separate documents if required.

Information on waste operations and emissions/risks is available in our document 'How to comply with your environmental permit' (available on our website at <http://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>).

**9. Application documents and management plans**

We have been unable to complete assessment of the documents provided in the application to decide whether or not they are appropriate for the proposed activities, as we do not have enough information on what the proposed activities are in order to do this.

**ACTION:**

- a) Please ensure that all application documents fully reflect the all proposed activities, and that they consider all relevant risks from the proposed activities and address these appropriately. This includes (but is not limited to) the Environment Management System (EMS) Summary, the Non-Technical Summary, the Site Specific Risk Assessment, the Fire Prevention and Mitigation Plan and any Management Plans / other documents required.
- b) Please ensure that the information in the documents is specific to the proposed activities and that adequate detail is provided to address all risks from the proposed activities.
- c) Please ensure that the information provided in different documents or different parts of the same document is consistent.
- d) Please ensure that the Site Specific Risk Assessment includes site-specific information on all sources, pathways and receptors that are relevant to the proposed activities, the site, the location and all nearby sensitive receptors.
- e) Please provide any amended versions of these documents to us.
- f) Please ensure that any other documents or appendices that are referred to and which contain relevant information are also provided.

**Please note:**

It is highly likely that we will require further information for this application, depending on the information received in response to this Schedule 5 Notice, as we do not currently have enough information to complete a full assessment of the application.