

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Mr John Homfray
Company Secretary
Cowbridge Compost Limited
The Lodge
Llwynhelig
Gibbotts Hill
Cowbridge
Vale Of Glamorgan
CF71 7FF

Application number: PAN-002360 (EPR/BP3095SR/V006)

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 26 March 2018.

The information requested should be sent to
louise.bailey@cyfoethnaturiolcymru.gov.uk by **08 May 2018**.

Name	Date
Louise Bailey	19 April 2018

Authorised on behalf of Natural Resources Wales

Schedule

1. Removal of closed vessel composting activity

To be able to remove the closed vessel composting activity from the permit please tell us whether any steps have been taken to avoid any pollution risk or to return the site to a satisfactory state. In most cases we will need to be satisfied that any pollution risks that have resulted from the operation of the site since the permit was granted have been removed.

In the case of relevant waste operations you may also need to take steps in relation to pollution risks that resulted from operations before the permit was granted. You must describe the pollution risks that you have identified and the steps you have taken to address them.

Where appropriate, explain how you have implemented any requirements of your permit relating to removal of pollution risks and restoration of the site to a satisfactory state upon surrender.

ACTION:

Provide information on how you decommissioned the closed vessel composting activity.

2. Odour management plan (OMP)

The odour management plan provided with this application (*CCL_ODOOUR_MANAGEMENT_PLAN_RevisedDraftAnov17 (003)*) only refers to the remaining composting activity. It makes no reference to the waste transfer activity and how odour will be managed.

ACTION:

Update your odour management plan to include the waste transfer activity, ensuring it is line with our guidance- [H4- odour management](#)

3. Fire Management Plan/ Fire Prevention and Mitigation Plan (FPMP)

Your Fire Management Plan (March 2018 v1) has been assessed against our guidance (Fire Prevention and Mitigation Plan Guidance- Waste Management v2).

The following are the points of your plan that do not meet the guidance (anything that is not mentioned has been accepted as meeting the guidance, and should not be changed). These have been set out as per the guidance:

5. Fire Prevention and Mitigation Plan contents

Your FMPM must include:

- A clear area must be established around the perimeter of site; this can vary depending on the layout of your site and permitted stack sizes in accordance with the separation distances as illustrated in Table 2 (this must be available at all times and identified on your site plan(s))
- techniques used to minimise the risk of fire spreading within the site or from the site
- all combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on people, critical infrastructure and the environment) and how they will be minimised. Operator needs to recognise the pollution impact of smoke and fire water and impact on environment and people.
- Site plan- Building layout (appendix 2) is missing. The site plan(s) *must* include (in addition to that already provided):
 - any areas where hazardous materials are stored on site (location of gas cylinders, process areas, chemicals, piles of combustible materials, oil and fuel tanks)
 - hydrants and water supplies
 - areas of natural and unmade ground
 - the location of plant, protective clothing and pollution control equipment and materials
 - drainage systems, foul and surface water drains, and their direction of flow and outfall points
 - the location of drain covers and any pollution control features such as drain closure valves and firewater containment systems
 - location of “off- site” emergency information pack with site plan (as specified above)

11. Enclosing stacks using bays and walls

Your FPMP should demonstrate:

- full and frequent stock rotation and how this will be monitored and recorded
- how stock capacity will be managed and controlled

12. Waste stored within a building

If you are storing waste within a building; you should adopt the following general principles for fire prevention and mitigation of fires at all times:

- Separation between internally stored wastes and building walls, plant & other equipment within buildings will need to be considered. In general fires in internally stored wastes are far more likely to spread to buildings and plant than for externally stored wastes. As a result, your insurer is likely to place more emphasis on internal storage than external storage fire management. You should seek advice from your insurer to ensure that you have met any requirements for fire detection and fire suppression.
- Waste storage areas should have some means of clearing smoke from the building, such as openable skylights or roller shutter doors, to aid fire-fighting.

14. Layout of waste stacks on your site

The following need to be considered in terms of site layout:

- Location of potential ignition sources on your site
- Location/s of occupied buildings and high-asset value equipment and plant
- Escape and evacuation routes around your site and within buildings must not be compromised by stack layout
- Location of flammable and/or hazardous substances kept on site, such as gas cylinder cages, diesel tanks, quarantine areas which may contain non-conforming wastes etc.
- Locations of on or off-site fire hydrants, other water supplies and fire-fighting equipment – you do not want to block access to these with your stack layout
- Proximity and location/s of any infrastructure which may be affected by a fire, such as overhead power lines, major roads, rail lines etc.
- Proximity and location/s of any off-site, third party buildings which may be affected by a fire
- Permitted amounts of wastes, and types of waste, allowed on site

15. Seasonality and waste stack management

You should demonstrate that your waste stack management is viable and that you are able to prove the suitability of materials, the resilience of the supply chain and end user outlets. You should provide a technical assessment that shows you have confidence that your proposal will be viable in foreseeable market conditions.

- provide a technical assessment that shows you have confidence that your proposal will be viable in foreseeable market conditions – this should prove the suitability of materials, the resilience of the supply chain and end user outlets

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Correspondence welcomed in Welsh and English

- If the materials on your site are subject to seasonal variation in demand and/or supply you should demonstrate how you intend to manage these variations. You should be able to demonstrate how you will follow the principle of “first in, first out” so that wastes are stored for no longer periods than indicated in Table 1.

17. Fire detection and 18. Fire suppression systems

- When deciding what type of system to install you need to take into account that:
 - the fire and rescue service may not be able to enter the building during a fire
 - a suppression system may not extinguish a fire, although it may prevent a fire spreading and then allow the fire to be fought effectively by the fire and rescue service
 - the water supply to a fire system is reliable and adequate at all times
- Have you considered fitting the following automatic detection systems such as?
 - smoke and heat detectors including temperature probes
 - CCTV visual flame detection systems
 - spark, infrared and ultraviolet detection
- Have you considered fitting the following fire suppression systems such as?
 - Sprinklers
 - manual open deluge system
 - deluge/water spray systems
 - water monitors/cannons/curtains
- Page 10- Testing and Maintenance- “The fire alarm sounder” is this a manual or automatic fire alarm?

24. Reviewing and monitoring your Fire Prevention & Mitigation Plan

The FPMP should be treated as a live document. As such you need to provide information to:

- You should describe the methods and procedures used to maintain compliance as a separate section within your Fire Prevention and Mitigation Plan?
- You should state the circumstances that would warrant a review, these could include:
 - Experiencing a fire incident. Following any fire, it is essential that your FPMP (and overall fire management measures) should be reviewed and improved as required to address any issues/concerns
 - Additional combustible waste streams accepted on site.
 - Increase waste volumes accepted.
 - Development of site infrastructure – new buildings.
 - Installation of new equipment or plant – baler/loading shovel/sort-line/trommel etc.

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- You should describe the areas of the FPMP that would need updating because of said circumstances? (see the guidance for examples)

Additional comments on fire plan, which may be need to be updated elsewhere in your application:

- **Page 4-Site details- building details:** “There is also a disused bio-bed filtration system”. Within your application you have stated that the bio-filter is to be used as an odour management tool. Please confirm if this is second bio-filter, or if one is to be used at all.
- **Page 7- Fire Risk Assessment- Significant Fire Hazards- “The quarantine area is located”. The sentence is incomplete**
- **Page 8- Storage within the Building-** “There will be only one waste pile within the building”. You are proposing to accept separately collected waste streams. As there is only one waste pile, are you intending to mix the separately collected waste streams?
- **Page 8- Storage within the Building-** “Waste will not be sorted or processed” You have requested treatments of sorting and separation within your EMS. You need to confirm which statement is correct and update the relevant document.

ACTION:

Update the FPMP (and any other relevant documents) in line with the above