

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To: Company Secretary
Tom Pritchard Contracting Limited
Earthmovers House
Unit 16 Llantrisant Business Park
Llantrisant
Pontyclun
CF72 8LF

Application number: PAN-001659

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, dated **29/06/17**.

The information requested should be sent to the following address by **11th August 2017**

Information should be sent to:

Permitting Service (Cardiff)
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Email: ella.williams@cyfoethnaturiolcymru.gov.uk

Name	Date
Ella Williams	24th July 2017

Authorised on behalf of Natural Resources Wales

Schedule

1. Odour Management Plan and Waste Acceptance Procedures

Amongst others, you have applied to add the following waste codes in this variation application:

10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 14	waste concrete and concrete sludge
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 05	glass

Your current permit does not allow you to accept wastes with any of the following characteristics

- Wastes that are in a form which is either sludge or liquid
- Wastes consisting of or contaminated with materials or substances which may pollute surface and/or groundwater and land

Document “EMS-new activities” and “Updated Environmental Risk Assessment” submitted with this application states there is no risk of odour from proposed waste codes. The documents also suggest that these waste codes will be stored on the existing hard standing infrastructure.

Whilst being an inert transfer station in terms of the definition of inert in [Environmental Permitting Charging Scheme 2017/18](#), it is still a household commercial and industrial transfer station in terms of [How to Comply with your Environmental Permit](#). As such, an odour management plan is required for the glass waste proposed to justify how the risk of odour will be minimised from the acceptance of glass.

Action:

We require the following information to determine if your proposals do not present a risk of pollution:

- Submit further detail on how odour will be minimised in the form of an odour management plan in line with [How to Comply with your Environmental Permit](#) and [H4 Odour Management](#) for EWC Code 19 12 05 Glass proposed to be accepted.
- Do you intend to accept concrete sludge under EWC Code 10 13 14? If yes, please provide information on how this will be managed to prevent pollution to

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Ffacs/Fax 0300 065 3001

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Gwasanaeth Trwyddedu (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP

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Gwefan/Website www.cyfoethnaturiolcymru.gov.uk

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surface and/or groundwater and land. This should be in line with [How to Comply with your Environmental Permit](#)

- c) Please provide details of the quarantine bay referred to in “EMS-new activities” in line with [How to Comply with your Environmental Permit](#), including but not limited to its infrastructure, size, turnaround times for removal etc. to prevent pollution.

2. Noise and dust risks

You have identified an increased risk of noise and dust from increasing annual throughput.

“EMS-new activities” states that the crusher will be used 1-2 days a month to process everything from that month. You also refer to “previous submitted EMS” for control measures, which “EMS-new Activities” supplements – it is unclear what version Environment Management System (EMS) you are referring to so we can’t assess if these control measures are still appropriate for the proposed new activities.

Whilst there is a decrease in prolonged periods of noise, this does increase the potential for significant risk of noise and dust concentrated onto those 1-2 days. No noise or dust complaints received to date, but if occurrences increase then this may increase.

Action:

- a) Confirm what version EMS you are referencing. The last version we have on file is Ref: 932_06_D received 19/10/14. If using another, please submit this, and confirm you are happy for us to use this in determination of the variation application.
- b) Please confirm if the mobile crusher is brought to site (and if hired from 3rd party or from other Tom Prichard sites) or if always available on the Project Red Recycling site.
- c) Confirm what checks will be made by Tom Prichard Contracting Limited to ensure the crusher is in line with [How to Comply with your Environmental Permit](#)

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in terms of noise and dust mitigation before use at the Project Red Recycling site.

- d) "EMS-new activities" states there will be "crushing of relevant wastes".

Please clarify what, if any, of the proposed waste codes in this variation application you intend to crush. If you proposing to crush any of the proposed waste codes, please amend and submit supporting documentation demonstrating how this will be managed to prevent risk of pollution and harm to human health from dust/particulates.

This should be in line with [How to Comply with your Environmental Permit](#) and [Technical Guidance Note M17 \(Monitoring\): Monitoring Particulate Matter in Ambient Air around Waste Facilities](#)

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