

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Company Secretary
Atlantic Recycling Limited
Rumney
Cardiff
CF3 2EJ

Application number: PAN-001546 (EPR/PP3993VS)

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 to determine your application for a permit, dated 27th April 2017. The information requested should be sent to the following address by 13th October 2017.

This notice has been sent to Frances Bodman.

Information should be sent to:

Kevin Ashcroft
Permitting Service
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Kevin Ashcroft	15 th September 2017

Kevin Ashcroft - Senior Permitting Officer (Regulated Industry)
Authorised on behalf of Natural Resources Wales

Ffôn/Tel 03000 654207
Ebost/Email kevin.ashcroft@cyfoethnaturiolcymru.gov.uk
kevin.ashcroft@naturalresourceswales.gov.uk

Schedule

A Fire Prevention Plan (FPP) has been provided in support of Atlantic Recycling Limited's permit variation application. Following assessment of the submitted FPP in accordance with NRW's Fire Prevention Plan Guidance. NRW has several queries to provide clarity.

1. The FPP does not state the amount and type of waste received daily and how it is managed. **Please provide details.**
2. The FPP does not state the total amount of waste and the types and forms (e.g. unprocessed, shredded, chipped, fines or baled) that are stored on site at any one time. **Please provide details.**
3. In section 3.1.1 it is stated that CCTV will be installed across the site. It has also been stated that the fires that have occurred in the past on site have been caused by arson. **Will intruder alarms also be installed to complement the CCTV?**
4. In section 3.1.2 it is stated that a small number of plant on site have automatic suppression installed. **Will all vehicles be fitted with fire extinguishers and dust filters?**
5. Will all bucket loaders be fitted with rubber strips to prevent sparks when the bucket comes into contact with concrete?
6. In section 3.1.3 it is acknowledged that the FPP guidance states that all electrical equipment must undergo certification and regular maintenance. It is stated that the requirement is met, however no written procedures are provided. **Please provide details.**
7. In the section about the causes of fire, there is no section about self-combustion. **Please provide details to show how you have considered this risk and how it will be managed.**
8. In section 3.3.1.2 Waste Storage Associated with New RDF/SRF processing facility it states that storage of unprocessed RDF/SRF inside the building will be in line with the storage durations of existing material on the site. **Please revise to ensure that the storage durations are in line with the FPP guidance**
9. In section 3.3.3.2 it is stated that the installation of suitable fire suppression will be considered for the building. Fire suppression in building is a "must have" not something to be considered. **Please confirm that fire suppression measures will be installed and provide details**
10. In section 3.3.4 it is recommended that daily monitoring of all stock piles is considered. Monitoring of stockpiles is not a consideration. Daily monitoring must be carried out in accordance with FPP guidance. **Please confirm and provide details.**
11. Similarly, in section 3.3.4 it states that for material stored for >3 months, consideration should be given to using a temperature probe. As above such

actions are not considerations. **Please confirm that such monitoring will be carried out and provide appropriate details.**

- 12.** In section 3.3.5 it states that unprocessed waste is not considered to be at risk from self-heating. In NRW's FPP guidance general mixed waste is provided as an example of waste at risk of self-combustion. **Please amend this section accordingly.**

Baseline Report

- 13.** The submitted baseline report should be targeted to the activities being added as opposed to a report covering both permits (Neal and Atlantic). At the very least a cover note pointing to the relevant sections would be useful.
- 14.** There has already been ~ 10 years' worth of potential site deterioration so to baseline these 2 new activities with new/current data it would need to be well evidenced that previous permit activities could not have had an impact on these specific areas. **Please provide appropriate evidence.**

Waste Water Treatment Plant

- 15.** It is noted that the company providing that waste water treatment plant are dissolved on companies' house. **Please confirm who will provide the WWTP and please confirm the final design.**

RDF/SRF Production

- 16.** After review of the RDF/SRF production process as described in the Operating Techniques update document, NRW do not consider that the treatment process directly and intentionally improves the quality of the waste as a fuel by changing the composition of the waste in a way that changes one or more of the following 5 parameters:
- a) Calorific (or heating) value;
 - b) Moisture content;
 - c) Ash content;
 - d) Chemical composition;
 - e) Heavy metal content.
- NRW therefore do not consider that this process needs to be permitted as an installation and that these activities can be carried out as waste operations. **If it is considered that the treatment carried out at site changes any of the five key parameters, please provide additional details.**

END OF SCHEDULE