

**Notice of request for more information**

Environmental Permitting (England and  
Wales) Regulations 2016

## Notice requiring further information

**To:** Company Secretary  
Associated British Ports  
25 Bedford Street  
London  
WC2E 9ES

**cc. Tony Davis:** [tonydaviskb@googlemail.com](mailto:tonydaviskb@googlemail.com)

**Application number: PAN-001962**

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 **06/10/17**.

The information requested should be sent to the following address by **10:00am on 27th November 2017**

**Information should be sent to:**

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

**Email:** [ella.williams@cyfoethnaturiolcymru.gov.uk](mailto:ella.williams@cyfoethnaturiolcymru.gov.uk)

Name	Date
<b>Ella Williams</b>	<b>6<sup>th</sup> November 2017</b>

Authorised on behalf of Natural Resources Wales

# Schedule

## 1. Drainage

In Table S1.1. of the permit you wish to transfer, all storage and treatment of waste shall take place on an impermeable surface with drainage to a sealed sump.

Your risk assessment (reference Environmental Risk Assessment – ABP Newport”) states that a mitigation measures for potential pollution to surface waters in water is collected in a sealed sump prior to recycling and/or off-site disposal.

There is no supporting documentation to say how this will be managed. It is necessary for us to assess this to as we have a duty to ensure ABP would be able to comply with this permit requirement.

### Actions:

- a) Please state whether there is one sealed sump that will service both sites, or if each site will have its own sealed sump
- b) Please submit the parts of your Environment Management System (EMS) that demonstrate how ABP will comply with this permit condition. Your management should include, but not be limited to how ABP will make sure that surfaces and containment of drainage facilities are adequate for all operational areas, taking into consideration:
  - collection capacities
  - surface thicknesses
  - strength/reinforcement
  - falls
  - materials of construction
  - permeability
  - resistance to chemical attack
  - the inspection and maintenance programme for impervious surfaces and containment facilities.

Further details of the minimum standards expected from a sump are given our guidance “[How to comply with your environmental permit](#)”. We shall assess your response against the standards of this guidance.

If there is one sump shared between both operators, you will need to submit an EMS for South Wales Wood Recycling Limited, and the EMS for Associated British Ports clearly demonstrating how the 2 operators intend to jointly manage the drainage infrastructure in line with the above points.

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Correspondence welcomed in Welsh and English

## **2. Treatment**

The non-technical summary states that wood will be stored and bulked up only. Given you have applied to transfer all the wood waste types in the permit, we consider that there will be sorting on site too.

### **Actions:**

- a) please clarify if wood waste will also be sorted

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### **3. Site Plan**

The site plan (ref:17 EC 064) has a corner cut off and cannot be used in the permit to appropriately show the proposed new permitted area for South Wales Wood Recycling Limited.

#### **Actions:**

- a) Please provide a separate site plan for South Wales Wood Recycling Limited clearly showing the proposed permitted area, outlined in green.

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**4. Odour Management Plan (OMP) – please provide answers to the below action points as a revised OMP**

**4.1. Managing inventory**

Section “odour control” of the OMP states “it is primarily controlled at source by good operational practice” and section “Storage inc. pushing up/working stockpiles” states that any material that becomes odorous during storage will be moved to the quarantine area for removal.

**Actions:**

- a) Please clarify what measures ABP to reduce likelihood of odorous waste arriving at site, including, but not limited to; specifications, contracts, sources, and pre-acceptance criteria.
- b) What is the maximum amount of time an odorous waste will be stored in the quarantine area until it can be removed
- c) Describe the quarantine area i.e. is it a sealed container or otherwise?

**4.2. Controlling evaporation**

Section “Storage inc. pushing up/ working stockpiles” of the OMP states all waste types will be stored on the dockside, this is outside.

**Actions:**

- a) Will there be any control measures to lower temperature by avoiding direct sunlight or otherwise reducing the water evaporation rate (which would increase risk of odour release)?

**4.3. Reducing impacts**

Table 1 of the OMP identifies potential odour sources and mitigation measures.

**Actions:**

- a) When will the operations identified in Table 1 take place, considering weather monitoring, or time of day to reduce perception of odour impact?

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#### **4.4. Monitoring**

Section “monitoring odorous releases” states monitoring assessments will be done “at locations within the site boundary” and refers to appendix 2 of the EMS for the locations.

#### **Actions:**

- a) Please provide appendix 2 of the EMS that shows the monitoring locations
- b) When will you conduct the daily monitoring to ensure your mitigation measures in Table 1 are working? This should include, but not limited to, reference to the activities that you have identified as being a risk factor in releasing odour.

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**5. Fire Prevention and Mitigation Plan (FPMP) - please provide answers to the below action points as a revised FPMP**

If granted, you will need to have a fire prevention plan in line with our current guidance, and operate it in line with our current guidance. We have assessed the FPMP (reference: June 2017 Version: 1.0) submitted with this application against the current guidance [Fire Prevention & Mitigation Plan Guidance – Waste Management Guidance Note 16 \(Document Version 2.0\)](#) (from here on referred to as “the guidance” in this section).

**5.1. Site Plan**

Appendix 1 of your FPMP is a site plan. It is missing detail that the guidance states it must have.

**Actions:**

- a) In addition to what you already have on the site plan, please include the following:
- Appropriate scale
  - access points around the site perimeter to assist firefighting – see table in guidance for typical FRS vehicle access requirements
  - areas of natural and unmade ground
  - drainage systems (sealed sump) and any outfall points
  - location of “off- site” emergency information pack with site plan
  - location of key receptors such as critical infrastructure, schools, hospitals, residential areas, workplaces, protected habitats and rivers within 1km of the site
  - prevailing wind direction

**5.2. Common causes of fires and preventative measures**

Table 4 of your FPMP lists the possible causes of fire. There are others in the guidance that we assess the site is at risk of which your FPMP does not currently consider.

**Actions:**

- a) please amend your FPMP to consider the additional causes of fires and preventative measures:
- Visitors & contractors

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- “Tramp” metal
- hot loads deposited at the site
- Build up loose combustible waste, dust and fluff
- Leaks and spillages of oils and fuel

### **5.3. Managing Waste Material Stacks and Separation Distances**

The guidance states all stack lengths and separation distances must be in line with the graphs in the guidance.

According to Graph 1 using the baled waste line for the Refuse Derived Fuel (RDF), a 17m separation distance is required for the 20m length you have stipulated in section 5.3 of your FPMP. You have a separation distance of 6m.

According to Graph 1, using the loose stack to loose stack line for the woodchip working pile, a 12m separation distance is required for the 50m length you have stipulated in section 5.3 of your FPMP. You have a separation distance of 6m.

According to Graph 1, using the loose stack to loose stack line for the woodchip storage pile, a 11m separation distance is required for the 25m length you have stipulated in section 5.3 of your FPMP. You have a separation distance of 6m.

The height of the woodchip piles is given as 6m. The guidance states 4m should be the maximum for firefighting practicalities.

#### **Actions:**

- a) Amend your maximum stack pile sizes in section 5.3 of your FPMP to be in line with the guidance. If you wish to deviate from the guidance, this must be supported by calculations from a competent fire engineer to justify bespoke separation distances.

### **5.4. Baled waste storage**

Section 5.5. of your FPMP only appears to be about the woodchip piles. The guidance states that if you are storing waste in bales, you must show how you are reducing the risk of fire occurring within the bales.

#### **Actions:**

- a) demonstrate how you are reducing the risk of fire occurring in bales It is recommended you do this by including (but not limited to):
  - sampling and testing protocol you will use to make sure you assess a representative number of bales (minimum 10%) and temperature readings from the centre of the bales; and from bales within the centre of each stack pile
  - that you turn the bales to make sure the waste stays cold

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- the storage configuration of the bales and whether any fire risk from the configuration been addressed

### **5.5. *Layout of waste stacks on site***

Your FPMP does not demonstrate the layout of the waste stacks on your site. The guidance states that when you have identified your size stacks, distances and storage methods, the storage arrangements can be planned, which will inform your firefighting strategy also.

#### **Actions:**

- a) Demonstrate what your storage arrangements are in line with the stack sizes and separation distances of your waste stacks. You should consider, but not be limited to, the factors specified in this section 14 of the guidance in your layout.

### **5.6. *Seasonality and waste stack management***

Your FPMP does not show that you have considered foreseeable market viability or seasonable variation in the market viability, which the waste types you permitted would be subject to. The guidance states you should do this. The waste types proposed are to be removed by shipment and are highly likely to be subject to seasonal variation.

#### **Actions:**

- a) 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.
- b) demonstrate how you intend to manage seasonal 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 of the guidance.

### **5.7. *Monitoring and turning of stacks***

In section 5.4. of your FPMP, you have proposed to use a 2m temperature probe for max stack depth of 6m, your monitoring section refers to monitoring, but of the working wood piles only. The guidance states the equipment you use to detect temperature and moisture content must be capable of operating at any depth throughout the pile. Therefore, your probe must be capable of operating the depth of the proposed stack.

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**Actions:**

- a) Please clarify how the monitoring will be done with a 2m temperature probe where the stack depths are greater than 2m.
- b) Please clarify if any monitoring of the wood storage piles is undertaken and what the monitoring will consist of.
- c) Please clarify if moisture content is monitored and what indicators you will use in relation to moisture contents and the escalation of actions in relation to this.

**5.8. Firefighting Strategy**

In section 5.6 of your FPMP, it states you will use machinery to remove burning material to the quarantine area, and sections 9.1.3 and 9.2.6 states you will remove burning material to quarantine area and quench burning material respectively as your firefighting strategy and techniques.

**Actions:**

- a) Please specify the nature of the plant referred to in your firefighting strategy to demonstrate how it is suitable and can be used to move waste around the site, for example loaders, excavators, material handlers, does the plant have fire and heat protected hydraulic systems etc.
- b) Will you have the finances available for additional resources if required?

**5.9. Water supplies**

Section 6.1.1 of your FPMP refers to fire hydrants on site as a water supply to fight fires. The guidance states that you must have sufficient water supplies available to your site for firefighting to take place.

**Actions:**

- a) Please demonstrate the volume of water this could supply and whether this is sufficient to manage a worst-case scenario incident

**5.10. Managing fire water**

Section 9.1.5 of your FPMP states sandbags will be deployed where practicable to manage firewater.

**Actions:**

- a) Demonstrate where this would and wouldn't be practicable and why it is suitable. This will depend on the size of the site, the amount of combustible material stored and the firefighting strategy. You should consider (but not be

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limited to) where the sandbags are kept, how many would be required, would they need to be replaced when saturated etc.).

- b) Demonstrate how the sealed sump drainage system would be managed in a fire to minimise pollution from fire water.

#### **5.11. Designated quarantine area**

Section 5.1.5 of your FPMP states that there will be a quarantine area. The guidance states that you should describe the volume it can hold, as well as the location of it.

##### **Actions:**

- a) The volume of waste that it could hold (this should be least 50% of the volume of the largest stack)
- b) Does the quarantine area have a separation distance of at least 6 metres around the quarantined waste?
- c) Is the quarantine area flexible? If yes, identify all areas in the permitted boundary on the site plan that could be used and answer 5.11 a) and b) for all areas identified.

#### **5.12. During and after an incident**

Section 9.3. of your FPMP states what will be done after an incident but not what will happen operationally during an incident. The guidance states you must have contingency measures in place before and after an incident.

##### **Actions:**

- a) Demonstrate the contingency measures in place for dealing with issues during and after a fire, including but not limited to, diverting incoming wastes to alternative sites during a fire, having a plan for how you will notify those who may be affected by a fire, such as nearby residents and businesses and contractors that might be used to assist with additional plant for firefighting techniques, removal of waste material, containment and removal of excess water run-off.
- b) the steps you must take before the site can become operational again – section 9.3. is unclear if these steps are undertaken before the site is operational again

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### **5.13. Reviewing and Monitoring your Fire Prevention & Mitigation Plan**

Section 9.3.4 of your FPMP states that the only time the FPMP will be reviewed is following a fire incident. The guidance states that your FPMP should be treated as a live working document and reviewed regularly.

#### **Actions:**

- a) described methods and procedures used to maintain compliance as a separate section within your Fire Prevention and Mitigation Plan.
- b) States all circumstances that would warrant a review of the FPMP, this may include but not be limited to the examples given in the guidance.
- c) state the areas of the FPMP that would need updating because of said circumstances answered in 5.13 b)

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