

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Company Secretary
Qualitech Environmental Services Limited
424-426 Haydock Lane
Haydock Industrial Estate
St Helens
Merseyside
WA11 9UY

cc Roy Brunt (via email)

Application number: **PAN-002394**

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 24 November 2017. The information requested should be sent to the following address by **13 July 2018**.

Information should be sent to:

Jacqui Collier
Wales Permitting Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Jacqui Collier	08/06/2018

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 03000 653031

Ebost/Email jacqui.collier@cyfoethnaturiolcymru.gov.uk
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Gwasanaeth Trwyddedu (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP

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

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
www.naturalresourceswales.gov.uk Correspondence welcomed in Welsh and English

Schedule

Infrastructure

1. Is the whole site concreted or just the storage bays? If not what surface is the rest of the site? What will stop runoff from concreted areas?
2. The solvent bulk storage area consists of two tanks within a contained bund. What is the capacity of the bund, in litres? Is it CIRIA C736 compliant?
3. Is all of the other bunding on site CIRIA C736 compliant?
4. Can you please clarify the following about the drainage pit. How is it constructed, is it an open pit, will rainfall also be collected in the pit, what is the capacity and how often will it be emptied?
5. Are the containment sumps at the front of each storage bay open or closed channels? Is the surface water drainage system above or below the surface?
6. Document B2.8 Accidents lists an oil-water interceptor as a risk minimisation technique for fuel spills from vehicles, and failure of the interceptor as a possible accident. There is no interceptor shown on the surface water drainage plan. Can you please confirm if there is an interceptor and where it is. The drainage plan should be updated to show the location.
7. The flammable storage area marked on Figure 2 – Installation boundary shows two separate buildings which are marked on the drainage plans as Dept 4 and covered toxic storage compound. The description of this area in document B2.1 is of a concrete floor split into one storage bay. This does not reflect what is on the plans. Also it is described that each of the bays will have a containment sump at the front of the bay. The drainage plan appears to show the drainage going through the boiler house, where is the sump located?

Fire Prevention Plan

8. Activities at the site will involve the storage of hazardous and non hazardous waste. You will be storing a number of waste types including but not limited to plastics, metals, wood and tyres, which our Fire Prevention & Mitigation Plan (FPMP) Guidance lists as combustible materials for which you must follow the standards in the guidance for, for producing a site fire plan. Please provide a written site specific FPMP which incorporates the FPMP guidance with appropriate sector guidance such as HSG51 for the storage of flammable liquids in containers.

Our FPMP guidance is available on website at the following link:

<http://naturalresources.wales/permits-and-permissions/environmental-permits/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>

9. In Operating Techniques table in Part B3 have referred to HSG51. Why is HSG176 for the storage of flammable liquids in tanks not being used?

Emissions to Air

10. Table B2.2.1 refers to A1 as the only emission point and document B2.10 states only one emission to air. B4.1.2 however, states there are only four point sources of emissions to air then lists A1 – solvent bulking tank. Can you please clarify how many emissions to air there are and what they are. Do both solvent tanks emit from the same point?
11. Table 2.2.4 says there will be one carbon filter at each release point. How many filters will be used on site?
12. Emission point A1 is shown on Figure 2 Installation boundary. It is in a different location to the solvent store compound shown on the drainage plans. Can you please clarify where the emission point(s) will be.
13. There is a boiler house shown on the surface water drainage plan but document B2.2 says there will be no boiler plant on site, is this the case?

Odour Management Plan

14. You have considered odour in document B2.2 and some of the waste materials at site do have the potential to cause odorous releases. How to Comply lists different activities for which operators must have an Odour Management Plan in place, waste transfer stations are included. Please provide an Odour Management Plan in line with H4 Odour Management which is available on our website at the following link:

<http://naturalresources.wales/permits-and-permissions/environmental-permits/horizontal-guidance/?lang=en>

Site Plans

15. Section B2.1.10 of document B2.1 refers to a site layout plan, figure 2. Figure 2 that is attached to email Appendix 1 shows the site boundary not the layout. Can you please provide the layout plan referred to.
16. The solvent store shown on the surface water drainage plan is outside of the installation boundary, shown on figure 2 referred to above. Can you please clarify this.
17. The site boundary and installation boundary are not the same. Why not? Who will have control of the other areas of the site and what activities will they be used for?

Operations

18. Document B2.1 In process controls states that appropriate site personnel will be trained in the spill prevention and remediation procedure. What is the procedure?
19. Will any container/drum washing be carried out on site and if so what is the procedure for this?
20. Where storage bays are used to store liquid, solid and sludge waste how will each be managed within the storage area?

Competency

21. A copy of the Continuing Competency Certificate for Bryan Foster has been provided. Can you please provide copies of the original WAMITAB qualifications upon which continuing competency is based.

Security

22. What security arrangements are in place at the site to prevent uncontrolled or unauthorised access?

Raw Materials

23. Where and how are the mineral and diesel oils stored?