

Notice of request for more information
Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: AMG Resources Limited
Nevill's Dock
Llanelli
Dyfed
SA15 2HD

Application number: **PAN-004567**

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 01/02/2019. The information requested should be sent to the following address by **11/06/2019**
Information should be sent to:

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

Name	Date
Kirsty Thomas	07/05/2019

Authorised on behalf of Natural Resources Wales

Schedule

1. Fire Prevention and Mitigation Plan (FPMP)

1.1. Please provide an update Fire Prevention Mitigation plan and re-submit as insufficient information has been provided. Please consider (but not limited too) the following points:

- The Fire Prevention and Mitigation Plan (FPMP) should clearly include the amount and types of waste to be received **daily**. I can see Table 2 of the FPMP details the total amount of waste to be stored at any one time but not clear on how much will be received on a daily basis.
- The full list of waste types/codes to be accepted at the installation are listed in Table 6 of the EPTR document. They are not included in the FPMP or listed as an Appendices. Please ensure the full list is clearly shown in the FPMP which can reflect the codes on the site plan easily and confirm the daily amount be received.
- Identify on the site plans which waste piles are stored in bays, containers, stockpiles etc. and what form each waste pile is in (shredded, baled, unprocessed etc).
- 4.5.2 of the FPMP states “In the event of a fire, action will be taken to prevent potentially contaminated firewater from entering the drainage system including the deployment of drain barriers, booms and spill kit containment measures, as described in above in Section 5.5”. There is no section 5.5 in the FPMP, please identify where this information is located.
- “If it is safe do so, a temporary bund (firewater booms) will be constructed to ensure that firewater is kept within the 5.4 activity boundary which benefits from impermeable surfacing (any firewater held within the bund will be tested before removal offsite to a suitably licensed facility once the fire has been extinguished); if possible, drains will be blocked with drain mats to prevent the ingress of the firewater” Where will the firewater drain to if the drains are not blocked? Please provide more information on firewater management.
- Identify on the site plan the location of drain barriers and booms.
- The minimum separation distance does not appear to be in line with the Fire Prevention and Mitigation Plan Guidance (Figure 1). Please revise FPMP and site plan to ensure the minimum separation distance/fire break distance is adhered to.
- In the event of a fire, what kind of emissions would you expect?
- You must have the contact details of all sensitive receptors within 1km of the site. Including schools, resident’s etc. Please update plan.
- Any contractors that might be used to assist with additional firefighting techniques, removal of waste material, containment and removal of excess water run-off must be included in the contact details. Please amend as necessary.
- Please submit the planned prevention management plan PPMR as referenced in the supporting information.

- Waste code 19 12 10 is on the site plan but not on EWC codes of waste to be accepted at the installation. Please clarify if this waste type is to be accepted and amend documents as necessary.

2. BAT Assessment

2.1. Please provide an update BAT Assessment and resubmit as insufficient detail has been provided. Please consider (but not limited too) the following points:

- BAT 1 - A BAT requirement is to have an appropriate environmental management system in place. As per the documentation provided, the existing system is based on the 14001:1996 standard, however, the system will be updated to follow the 14001:2015 standard. The time scale for this to be completed was Q1 2019. Can you confirm that the site now has a EMS meeting ISO14001:2015 standards? Please can you submit the updated EMS.
- BAT 1– consideration for decommissioning.
- BAT 1 - Sectoral benchmarking on a regular basis.
- More detail is required to satisfy BAT 3 – Emissions of dust. Need more detail on expected dust levels as well as noise and vibrations. Please provide further details.
- Consider BAT 6 and BAT 7 particularly if AMG are going to continue to discharge s/w to existing discharge point.
- Not sufficient evidence to show BAT 14 is adhered to. Need more details. Dust management (dampening) is mention in Table 4 of the EMP but this is only a small part of BAT14.
- Consider BAT 17 in more detail e.g. protocol for conducting noise and vibration monitoring.
- BAT 18 – The wording used in Table 9 Table is from BAT 14 and should be reworded. Confirm which one or combination of techniques are implemented to adhere to BAT 18
- Consider BAT 19 – particularly water management; roofing of water etc.
- BAT 25 (d) – confirm if there will be water injection into shredders for dampening.
- BAT 21 – AMG refer to an AMP but not sure if this has been submitted? Please submit as documents indicate this will be completed during Q1 2019.
- BAT 24 – What happens if the waste doesn't meet specification outlined in section 4.8.2.3?
- BAT 28 – Clarify if the shredder feed is equalised by avoiding or overload of the waste feed which would lead to unwanted shutdowns and start-ups of the shredder.

3. Noise and Vibration Management Plan/Risk Assessment

3.1. Please provide an updated Noise and Vibration Management Plan/Risk Assessment as and resubmit as insufficient detail has been provided. Please consider (but not limited too) the following points:

- No information has been provided on the existing background sound level or sound levels associated with the plant, machinery and operations conducted on site. Please provide further details e.g. manufacturing specification of the equipment used on site such as the shredders, balers and magnetic separator (including noise

and vibration outputs expected). Please confirm which equipment is the same as currently permitted under the 2.2 activity and which equipment is new. A change in waste types could result in different sound levels emitted from machinery. The expectation is that sound is measured at the nearest sensitive receptors or modelled using the details discussed above.

- Provide sound levels, either measured or predicted, from the main activities/operations including and the sound levels from vehicle movements and tipping. Will the expected sound levels be the same as the levels assessed under the 2.2 activities already on the permit? Depending on the expected noise levels, further modelling may be required.
- Depending on the outcome of 3.1 and 3.2, have any additional noise and vibration impacts been assessed against nearby ecological receptors that could be affected by noise and vibrations e.g. Burry Inlet SPA which has bird species that are susceptible to noise disturbance?
- Confirm if the buildings where the main activities take place are enclosed? What levels of sound attenuation can be expected from the buildings – provide evidence. Will doors be closed when activities inside are taking place?
- More evidence is required to satisfy BAT 17 and 18 in the BAT assessment. Please refer to our/EA Horizontal Guidance for Noise Part 2 – Noise Assessment and Control - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/298126/LIT_8291_337647.pdf

Note - If the revised risk assessment shows any potential impacts then further modelling may be required.

4. Dust

4.1. Please provide an update the Environmental Risk Assessment (and other relevant documentation) as insufficient detail has been provided and re-submit. Please take into account (but not limited too) the following points:

- Provide details on levels of dust expected from proposed activities on site e.g. tipping of waste.
- Clarify the distance of areas where dust can potentially be to the nearest sensitive receptors.
- Provide more details on dust suppression measures.
- Have the impacts on dust been considered on ecological receptors?

5. Pest Management Plan

5.1. Please see attached separately to this notice detailed comments regarding your pest management plan from an external party. Your pest management plan is not robust enough/provide enough detail to satisfy that pest issues will be managed effectively. Please provide an updated Pest Management Plan (and other documentation as necessary) to reflect these comments. Also take into account the following point:

- Will monitoring be part of the prevention strategy in 5.1 of the pest management plan? Who will carry out monitoring of waste coming in/contaminated waste (including monitoring and arranging contaminated waste removal) etc? Will inspections be logged?
- Further clarity on how 'staff will be suitably trained in the conditions of the permit PMP and EMS' (5.2.1 of pest management plan).
- Are there defined timelines in the PMP and EMS?
- Will office waste include waste such as food? Is collection of office waste weekly or more frequent?
- 'The waste piles will be processed quickly to achieve a short turnaround time preventing pest establishing a habitat within the waste piles'. Provide further clarity on this e.g cut off times (hours/days etc). Who is responsible for this monitoring and what actions will be taken if time scales are breached?
- Further clarification required to demonstrate how waste materials on site will be inspected to ensure it does not contain food or water. What are the procedures to follow if food is identified?
- In the sampling of the loads coming into site, where will the bales be separated for inspection? What is the frequency of these checks?
- Do AMG already have a 'specialist pest control company' appointed?
- Further clarity on 6.1 response to complaints – who will complaints be accepted from, timescales for responding etc.
- 6.2 records – This section appears to cover responses to complaints only. It would be beneficial to identify what monitoring records should be retained, who is monitoring, corrective actions etc. (Including routine/programmed inspections carried out by the specialist pest control company).
- Confirm all floor areas where waste will come into contact is constructed on concrete including the quarantine area.

6. Additional

- 6.1.** Please provide your Planned Prevention Management Plan as it is referenced in several of the supporting documents to support the permit application.
- 6.2.** There appears to be different versions of the site plan though out the supporting documents. For example, the de-tinners mud shed quarantine area for pest management is labelled as number 10 on the key in one and number 11 in another. I assume the version called "final drawing" is the most appropriate one but please can you confirm and update documents as necessary.
- 6.3.** Please update documentation to reflect that this permit variation is V008 not V007. V007 was a returned application as not duly made dated the 7th November 2018.