

## PAN-020500 Not duly made information – Response following NRW email of 28<sup>th</sup> February 2023

Question No.	Question	Response
1	OPRA and fee (Part F1)	In accordance with your comments the OPRA spreadsheet has been amended and resubmitted. We believe there is some argument to be made regarding the significance of surface water sensitivity and direct surface water run off given the waste stored outside within a sealed and lockable container. Similarly, NRW 'Check your flood risk' confirms the risk of flooding to be low to very low. Regardless, and to avoid further delay, the additional cost has been covered, payment of £350.00 has been made over the telephone, under the following reference number PAN-020500.
2	Document Checklist	<p>The reference to the List of waste document in the cover letter (K419.1~04~001) has been corrected.</p> <p>NB List of waste document now referenced as K419.1~09~007.</p> <p>Table 2 on Application Form F1 does not provide sufficient space for all the application documents to be listed. The box above this table identifies the document (K419.1~04~001 Cover Letter) which contains the full list of application documents.</p> <p>For clarity, the cover letter (K419.1~04~001) has been amended to include all documents and associated appendices within the application pack.</p>
3	Declaration (Part F1)	We believe this may have been a technical issue when the pdf was uploaded to the portal; please find the re-submitted F1 form complete with signature.
4	Proof of Technical Ability	No action required.
5	Operating Hours	Operational hours are now specified within the Management System Summary and the Fire Prevention Plan. The site will; operate between 08:00 and 17:00, Monday to Friday.
6	Environment Management System (EMS)	Application documents have been reviewed, and where appropriate, amended to address the comments made. The following provides a guide to those changes or to identify where the relevant information had been addressed within the submitted information

Question No.	Question	Response
		<p><i>To avoid or minimise environmental risk an[d] impact of the normal running operations</i></p> <p>This is integral to the operations on site and throughout the Management System Summary (MSS), Fire Prevention Plan (FPP), and Environmental Risk Assessment (ERA).</p> <p><i>Waste acceptance, quantities, treatment, and storage procedures</i></p> <p>Section 6 (Reception, handling and storage of waste) of the MSS provides a detailed overview of pre-acceptance, waste acceptance, handling, and storage. Section 7 (Treatment Process) similarly provides a detailed description of the treatment processes undertaken on site for the various wastes accepted.</p> <p>The FPP also describes waste acceptance within Section 5 (Waste Management Activities).</p> <p><i>Storage of materials on site including; storage times, maximum storage capacities for specified storage areas and site as a whole, maximum storage heights.</i></p> <p>Storage areas are outlined within Section 6 (Storage Areas) of the FPP and indicated on the Site Layout Plan (K419.1~20~004). Section 7 (Managing Storage Times) of the FPP describes estimated storage times on site for all wastes accepted; all within the 3-month period stipulated within NRW guidance. Maximum storage capacities are indicated within Table 2 of Section 8 (Maximum Piles Sizes) of the FPP whilst this also describes the height of waste storage areas (within the threshold described in the guidance). In addition to Table 2, Section 8.1 also gives further description around containers used and associated maximum heights.</p> <p><i>Procedures to identify specific waste types stored at your facilities</i></p> <p>Section 6 (Storage Areas) of the MSS describes the pre-acceptance and waste acceptance procedures; all loads received are accompanied by the relevant consignment/waste transfer note and other accompanying information which amongst other details provides the relevant waste code and a description of the waste. These are cross-referenced with the delivery during a visual inspection to ensure waste types are identified correctly. All operators are trained accordingly to ensure they are knowledgeable regarding the differences between the specific waste types accepted.</p>

Question No.	Question	Response
		<p><i>Procedures to segregate incompatible wastes</i></p> <p>All wastes are containerised and therefore automatically segregated and any reactions between wastes prevented. There are limited waste types accepted at the site. Other measures are outlined within the FPP (Section 7 &amp; 8)</p> <p><i>Drainage Infrastructure</i></p> <p>Site operations are undertaken internally, within a industrial unit with an impermeable surface; the only drainage infrastructure namely the drainage channel is indicated on the Site Layout Plan (K419.1~20~004). Management of firewater and how any contaminated water will be prevented from entering the drainage infrastructure is outlined within Section 17 (Managing Firewater) of the FPP.</p> <p><i>Transportation and Distribution</i></p> <p>The operations undertaken on site are of a low-scale and as such extensive transportation and movement of incoming wastes is not necessary. Wastes moved internally on site are done so manually or using a forklift when needed. Dispatch of PCBs, ceramic monolith is approximately every four weeks given the small scale of the operations, so transportation is not needed on a frequent basis.</p> <p><i>Potential pollution from site activities and the associated impact on air, water, land and neighbours</i></p> <p>The Environmental Risk Assessment (ERA, K419.1~09~005) discusses all potential risk to the above. Table ERA1 provides an overview of the identified hazard types, potential source, associated risk and whether further assessment is required. Further assessment is depicted in Section 5 (risk assessment) of the ERA and describes impacts and how the associated risks are mitigated.</p> <p><i>Procedures to enable you to apply the waste hierarchy of re-use, recover, recycle, dispose</i></p> <p>The overarching theme across the EMS is where the operations on site sit within the waste hierarchy; the very function of site operations and the business model of Telecycle is for the recovery/recycling of different components within catalytic converters/WEEE waste and PCBs. PCBs arrive to site source segregated so the waste hierarchy has already been applied.</p>

Question No.	Question	Response
		<p><i>Duty of care</i></p> <p>Although not explicitly titled and described within the EMS, the duty of care is implicit throughout the EMS documents in how waste is accepted onto site, the associated handling &amp; treatment and the storage of the wastes. Registration for the relevant CIWM technical competence qualification has been completed further demonstrating the appreciation and implementation of measures to meet the relevant duty of care requirements</p> <p><i>Details of non-compliance and how it is dealt with</i></p> <p>Please see Sections 6.3 and 6.4 of the MSS which details the relevant actions if non-compliant material is discovered during waste acceptance or through operations. It also details the type of records kept and the duration. Section 13.1 details how any incident of non-compliance shall be investigated.</p>
7	Fire Prevention and Mitigation Plan	<p><i>Section 5: Fire Prevention and Mitigation Plan contents</i></p> <ul style="list-style-type: none"> <li>• <i>The amount and type of waste received daily and how it is managed</i></li> </ul> <p>A full list of waste table (Table 1 within FPP) details the types of waste accepted on site; Sections 2 (types of combustible materials), 5 (waste management activities) and 8 (maximum pile sizes) also provide details on the types of waste accepted. The acceptance and handling of waste is conducted in accordance with Section 5 (waste management activities) of the FPP.</p> <ul style="list-style-type: none"> <li>• <i>Total amount of waste and types and forms stored on site, and how it is stored</i></li> </ul> <p>Details of the type of waste stored is provided within Section 8 (maximum pile sizes) whilst Table 2 provides details on maximum volumes of waste stored. Sections 5 (waste management activities), 6 (storage areas) and 8 (as above) all provide description on how wastes on site are stored namely in containers (IBCs, bulk bags, 8-yard skip).</p> <ul style="list-style-type: none"> <li>• <i>Maximum sizes of waste piles</i></li> </ul>

Question No.	Question	Response
		<p>Please see Table 2 within Section 8 (maximum pile sizes) – this has now been amended to include the 8-yard skip stored outside of the industrial unit. Section 7 (managing storage times) provides detail on the storage racking and its contents (treated WEEE fractions). The remainder of the racking is used for the storage of ceramic monolith (stored within IBCs) which is non-combustible material. NB The maximum volume of waste is approximately 80m<sup>3</sup> which, depending on material types, equates to approximately 40 tonnes, of which less than 40% is potentially combustible.</p> <ul style="list-style-type: none"> <li>• <i>Fire prevention techniques used</i></li> </ul> <p>Details of fire prevention techniques are provided across multiple sections. Section 9 (managing common causes of fire) and Table 3 gives details of the most likely causes of fire and how these are mitigated. Section 10 (preventing self-combustion) gives details of measures in place to limit the risk of self-combustion. Sections 11 (monitoring the fire risk) and 12 (detecting and suppressing fires) provide details on the monitoring of risk and how fire would be detected on site both within operational hours and outside. Section 18 (during or after an incident) details the reporting of any fire incident both during and after the incident; please in addition see Sections 20 (informing Natural Resources Wales) and 21 (incident reporting and investigation) which provide additional detail on the reporting and recorded details of any such fire incident.</p> <ul style="list-style-type: none"> <li>• <i>Techniques used to manage fire spreading</i></li> </ul> <p>Please see Section 15 (firefighting techniques) which details fully the techniques used to combat fire spread.</p> <ul style="list-style-type: none"> <li>• <i>All combustion products and emissions</i></li> </ul> <p>Please see Section 17.1 (managing fire residues) which provides detail on how combustion products (fire residues) are managed following an incident. Section 18 (during and after an incident) also describes products of combustion.</p> <ul style="list-style-type: none"> <li>• <i>Contact details of sensitive receptors</i></li> </ul>

Question No.	Question	Response
		<p>See Appendix C of Fire Prevention Plan.</p> <p><i>Section 5: Site Plan</i></p> <ul style="list-style-type: none"> <li>• <i>Where each type of waste is stored</i></li> </ul> <p>Please see the Site Layout Plan (K419.1~20~004) which indicates storage areas for PCBs, Metal Casings/Ceramic Monolith, RCF Matting/Dust, Treated WEEE fractions and Ferrous Steel.</p> <ul style="list-style-type: none"> <li>• <i>Areas where hazardous materials are stored</i></li> </ul> <p>Site Layout Plan (K419.1~20~004) has been amended to show location of gas cylinders.</p> <ul style="list-style-type: none"> <li>• <i>Location of plant, pollution control equipment</i></li> </ul> <p>See amended Site Layout Plan (K419.1~20~004) which shows extraction system and fire water containment measures. Mobile plant parking, after operational hours, is located in the area identified as the quarantine area on the site layout plan..</p> <ul style="list-style-type: none"> <li>• <i>Location of drain covers, pollution control measures</i></li> </ul> <p>Please see amended Site Layout Plan (K419.1~20~004) which shows the storage location of the firewater barrier; the extraction system is marked as part of the shearing area on the southern boundary.</p> <ul style="list-style-type: none"> <li>• <i>Location of off-site emergency pack</i></li> </ul> <p>Please see amended version of site layout plan where it is marked at “Emergency Information Pack”.</p> <p><i>Section 12: Waste stored within a building</i></p> <p>All wastes stored within the building are stored within containers preventing reaction between wastes. Storage areas of the highest risk of combustibility are covered by automated fire extinguishers to mitigate and lower the overall risk level. Sections 8 (maximum pile sizes), 9 (managing common causes of fire), 10 (preventing self-combustion), 11 (monitoring the fire risk) and 12 (detecting and suppressing</p>

Question No.	Question	Response
		<p>fires) provide further detail around the wastes stored internally, how fire risks are managed, detection systems in place and suppression methods.</p> <p><i>Section 13: Wastes stored within containers</i></p> <p>All wastes are containerised and have been discussed throughout the FPP as such. Section 8.1 describes the accessibility to containers within the event of fire.</p> <p><i>Section 20: Water Supplies; Section 21 &amp; 22: Water run-off and Quarantine Area</i></p> <p>The figure provided (15m<sup>3</sup>) was an error and has now been rectified to the correct figure of 22 m<sup>3</sup>. The size of the Ferrous Steel Bin does not have an impact on the fire water management or the quarantine area as it is not combustible waste. Storage racking and its contents is detailed within Section 7 (managing storage times) of the FPP; waste stored is containerised and non-combustible except for the treated WEEE fractions (already discussed).</p>