

**Notice of request for more information**

Environmental Permitting (England and Wales)  
Regulations 2016

**Notice requiring further information**

To: Hannah Powell  
Celsa Manufacturing (UK) Limited  
Building 18  
Tremorfa Works,  
Seawall Road  
Cardiff  
CF24 5TH

Application number: PAN-018725 (EPR/TP3639BH/V010)

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 17/03/2023. The information requested should be sent to the following address by 22/09/2023.

Information should be sent to:

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

Name	Date
<b>William Wallace</b>	<b>31/08/2023</b>

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 4448  
Ebost/Email [William.Wallace@cyfoethnaturiolcymru.gov.uk](mailto:William.Wallace@cyfoethnaturiolcymru.gov.uk)  
[William.Wallace@naturalresourceswales.gov.uk](mailto:William.Wallace@naturalresourceswales.gov.uk)

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP  
Permitting Service, Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website [www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English

# Schedule

## 1. Fire Prevention and mitigation plan (FPMP)

Provide an update fire prevention and mitigation plan which provide details on the follow:

- Section 6 provides details on the length and width of the stack but has not stated the height (nor does it confirm if the dimensions meet the guidance requirements of 4 meters separation distance). Submit all dimensions (L, H, W) for each stack and include separation distances within Section 6 of your plan.
- Submit a plan showing access route(s) for fire fighters within the site.
- Details of how each end of life vehicle is accessible from at least one side to allow fire to be fought and unburnt vehicles can be moved to prevent fire from spreading.
- List the european waste codes (EWC) present in each waste pile.
- Time taken to extinguishing individual waste pile/stack.
- Details of the length and width of the end of life vehicles stacks.
- Details of location of where gas cylinders are stored and distance from nearest waste pile/stack.
- Distance of potential ignition sources from the waste piles.
- Demonstrate how you will keep to the first in, first out principle to ensure that stocks are processed within a 3-month period.
- Information on combustible wastes or other flammable materials to be stored inside building, as mentioned for batteries and end of life vehicles depollution stations. Describe systems in place for fire detection and suppression (if appropriate). See reference to Section 12 of Natural resources Wales Fire Prevention & Mitigation Plan Guidance.
- Information on fire detection for wastes to be stored indoors (such as ELV batteries).
- Detail of methods to be used by staff to detect hotspots (such as thermal cameras).
- Volume of water and flow rate available for the water canons, located next to the shredder.
- Details if any automatic fire detection systems (other than the smoke/heat detectors inside the buildings) such as visual flame detection systems (on CCTV) or spark, infrared and ultraviolet detection have been considered to be installed on site or not and if not, provide justification why these are not considered appropriate.
- Details on emergency fire procedure arrangements outside working hours including machinery and staff availability at these times.

The following has been referenced within other parts of the application or email correspondence, which are relevant to the FPMP, however are not directly stated in the FPMP itself. The FPMP will need to be updated to also include the follow:

- The materials used for the (Either Legioblock, Fire resistant panels) and how the walls meet:
  - the FPMP guidance (notably Section 11. Enclosing stacks using bays and walls);
  - manufacturers requirements.
- 5000 litres of water available for the deluge in the shredder.

- The procedures and time required to close the penstock to seal off the site drainage after a fire incident is detected. This includes confirming the values are operated manually and confirming the location of the penstock valves (shown in a site plan if necessary).
- Location of any boreholes or watercourse in or near the site.

## **2. Dust management plan**

Provide an update Dust management plan which provides details on the follow:

- Identify and list other local contributors/sources of dust and emissions.
- The level of dust emission (from fugitive emissions) and dust deposition and what action/investigations/reviews would be undertaken if the these were exceeded.
- Actions to be taken when high levels of dust are observed during visual inspection.
- Free board height between top of waste stockpile and top of the bay wall to prevent influence/exposure to wind.
- Table references to other relevant management plans or procedure.

The following has been referenced in other parts of the application or email correspondence, which are relevant to the Dust management plan, however are not directly stated in the dust management plan itself. The Dust management plan will need to also detail on the follow:

- Mitigation measures that have been outlined in the table 5-1 of the fugitive dust impact assessment.
- Use of the Turnkey Optical Particle Analysis System (TOPAS) monitors (both existing and proposed) and how data from these will be used to feed into the dust management plan.

## **3. Tin Stockpiling management plan**

Provide an update Tin Stockpile management plan which provide details on the follow:

- A plan showing location of stockpiles and nearby receptors.
- How to deal with complaints and any additional actions and/or review if a large number of complaints are received.
- Areas where monitoring/inspections are carried out.
- Situations and time frames for review of the effectiveness of management plan and procedures.
- Staff Training on control of stockpiles and identifying level of flies/ breeding sites and when to escalate based on the number of flies.
- Any waste acceptance procedures that reject unsuitable wastes that can lead to a risk of flies.

## **4. Noise management plan**

Provide an update Noise management plan which provides details on the follow:

- Identify abnormal situations or incidences that may influence noise impact (such as weather conditions) and if there are any additional measures required.
- For monitoring, specify what kind of monitoring is undertaken and if relevant what noise measurement equipment will be used.

- Any engagement plans with local sensitive receptors if there are sustained noise incidences.

## **5. Other information**

For the secondary containment for hazardous materials, clarify how the bund will be built to have a volume in line with CIRIA 736 guidance (110% of largest tank / vessel, or 25% of total volume, whichever is the greatest).

**End of schedule**