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

Notice requiring further information

To: Maelor Foods Limited
Salisbury House
Vulcan Road
Bilston
West Midlands
WV14 7HT

Application number: PAN-020892 (EPR/AB3591ZQ/V004)

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 11/05/2023. The information requested should be sent to the following address by 13/12/2023.

Information should be sent to:

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

Name	Date
Lucinda Hall	**15/11/2023**

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 4419
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Lucinda.hall@naturalresourceswales.gov.uk

Schedule

Submit to NRW:

- **A revised Site Drainage Plan**

  The drainage plan must clearly identify all drainage and site infrastructure. This includes both surface and foul drains clearly showing the direction of flow and final destination of all drains across the whole of the installation site (including indoor drainage, location of storage tanks, bays, silos, reception areas, sumps, bunds, firewalls, interceptors, penstock valves, wash out areas, buildings/covered areas, areas of kerbing and hardstanding, areas of grass/ vegetation/grave, etc). All drains shown must include the points where it leaves your premises and where it goes.

- **A CIRIA Risk Assessment for the proposed Secondary Containment.**

  Whilst you have provided an assessment which determines the class of containment required, you have not provided sufficient information to demonstrate how secondary containment will be built in line with CIRIA 736 guidance. There are also a number of inconsistencies within your application which bring into question if volume of secondary containment capacity stated is correct. Submit a comprehensive risk assessment for your proposed containment, in accordance with CIRIA 736 guidance. Where you have undertaken modelling using suitable software, you must provide the supporting model input files.

We would expect your revised CIRIA Containment Assessment Report to address (but not be limited to) the following:

1. Tank Capacity calculations

- Application documents contain a number of errors and inconsistencies when referencing the number of tanks to be located within the bunded area. The list of tanks to be located within the new bunded area, as summarised within Table 20 in your main application report (Doc Ref: DM Appendix 5 - Application Document - Var 3 - New - FINAL (V2) 28 Apr 2023)) appears to be inconsistent with the number of tanks listed within other supporting document submitted (document referenced: *Appendix 7d - WWTP area - Env risk assessment for CIRIA Feb 23)*.
  You must provide a comprehensive list of all storage tanks to be situated within the proposed bunded area.
- It is also unclear whether tank capacity calculations have been based on working volumes or design capacity. You should always consider worst case scenario with capacity volumes calculated using calculations stated within CIRIA 736 standards. Section 4.3.2 of the guidance states: "*For above ground storage tanks, the brimful capacity of the primary containment should normally be adopted as advised in the environmental permit. However, where the tank is fitted with a physical overflow, the capacity at which the tanks would overflow may be taken*". Where reduced volumes are to be used within calculations, evidence should be provided to demonstrate that these tanks cannot be filled to the brim.

2. Options appraisal

- When completing a CIRIA 736 containment assessment, the design process should consider different options available, in order to identify the best solution. Only one option appears to have been considered for the new tank area.
- You must provide details of all containment options considered for the site and provide justification for the solution chosen.

3. Modelling

- We would expect your revised assessment of suitable containment for your site to be supported by modelling of each design option considered, to demonstrate suitability of your chosen solution.
- You must provide details of any modelling undertaken within your report, along with model input files as appropriate.

4. Engineering design of structures in the containment system

- There is insufficient detail to evaluate the feasibility of the containment structure proposed. E.g.
  - Is there existing infrastructure that would obstruct the building of the bund wall.
  - Will the wall need to be reinforced?
  - How thick will the wall be (no dimensions provided).
  - How will material be contained within the bunded area if there is a gap in the bund wall?

If the area is sloped to retain different levels of effluent within the containment area, you must provide elevation drawings to clearly show topography levels and gradients across the site.

- The drainage system within the containment area needs to be isolated from the rest of the site drainage and must be a sealed drainage system. The drainage drawings that have been submitted shows a gap in the bund wall to allow vehicle access, as well as surface water discharge points discharging to the river Dee situated within the bunded area. A sealed drainage system cannot be provided where there are clearly points of discharge within the proposed containment area.
- We require you to submit detailed CQA plans prepared by a competent engineer, for the intended construction (design drawings, tech specifications) of the proposed bunds, topographical survey which shows the levels within the bund and height of the proposed bund wall. The containment area appears to include tanks containing acid; thus you must be able to demonstrate that the proposed bund wall will be impermeable, stable and resistant to all materials to be stored within the bund.

5. <u>Procedures in an event of a spill</u>

- There is no description of the intended procedure to deal specifically with a spillages with the bunded area, to be able to evaluate the suitability of the proposed containment system. E.g. what is the process for emptying a spill and how long will this take for the worst-case scenario? Will a major spill affect the functioning of the Waste Water Treatment Plant (WWTP)? Have you considered additional capacity for rainfall during the days / weeks it may take to empty the bund.

For clarification, your secondary containment design should incorporate the following elements:

- have a capacity greater than 110 percent of the largest tank or 25 percent of the total tankage, whichever is the larger, with evidence submitted to demonstrate that this criteria has been met;
- bunds walls must be impermeable, stable and resistant to the stored materials;
- impermeable surfacing within the bunded area should not contain any outlets (that is, no drains or taps) and drain to a blind collection point;
- there should be no penetration of bund walls;
- bunds should be designed to catch leaks from tanks or fittings, including tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage at all connection point locations;
- You must provide details of any joints, seals/sealants, tie-bar holes to be incorporated within your design;
- You must provide details of your procedure for managing and removing clean uncontaminated surface water collected within the bunded area during normal operations;
- You must provide details of your proposed planned inspection & maintenance regime (programmed engineering inspections (extending to water testing if

structural integrity is in doubt) of the newly proposed bund and sealed drainage area;

- You must provide evidence to demonstrate that the design has been validated by a suitably qualified person;
- have regular visual inspections - any contents must be pumped out or otherwise removed under manual control after checking for contamination.