

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

Notice requiring further information

To: Celsa Manufacturing (UK) Limited
Building 58
East Moors Road
Cardiff
CF24 5NN

Application number: **PAN-005485**

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 13/05/2019. The information requested should be sent to the following address by **08/11/2019**. Information should be sent to:

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

Name	Date
Kirsty Thomas	18th October 2019

Authorised on behalf of Natural Resources Wales

Schedule

1. Fire Prevention and Mitigation Plan (FPMP)

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 1 of the FPMP details the maximum amount of waste to be stored at any one time but not clear on how much will be received on a daily basis. Please clarify.
- What form is the unprocessed material received as e.g shredded?
- The full list of waste types/codes to be accepted at the installation are listed should be included in the FPMP or listed as an Appendices. Please ensure the full list is clearly shown in the FPMP which can reflect the wastes on the site plan easily.
- Please provide more information on firewater management and firewater containment facilities. Are adequate water supplies available? Identify firewater facilities barriers etc to the site plan. Include how measure to prevent the local groundwater and surface water bodies be affected. Any well, spring or borehole within 50m used for the supply of water for human consumption, including private water supplies?
- The maximum stack height does not appear to be in line with the Fire Prevention and Mitigation Plan Guidance. A height of 12 metres may not be manageable. Please revise FPMP and site plan to ensure the maximum stack height is adhered to and provide more detail on stack management.
- 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 to include the contact details. How will contact be made? There is no mention of the nearby traveller site in the FPMP, how will contact be made to this receptor? How will contact be made to industrial areas nearby?
- 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.
- How is safe access to the site for fire and rescue services and other emergency responders achieved?
- How will visual inspections be carried out to identify hot spots? How are staff trained to identify these? How will hotspots be managed.
- Update possible causes of fire section to include tramp metal, visitors and contractors, batteries within waste deposits, batteries in ELVs and cylinders.

- Seasonal variations in the market/fluctuations need to be considered. We need to be satisfied that there are outlets for the waste available, what happens if there is a drop in the market? Will the scrap metal still be processed and transferred from the site within 3 months? Provide a technical assessment that shows you have confidence that your proposal will be viable in foreseeable market conditions – this should prove the suitability of materials, the resilience of the supply chain and end user outlets.
- Appendix 2 – Site Plan of the FPMP needs to be updated to include the additional points; any areas where hazardous materials are stored/potential ignition sources, main access routes for fire engines/alternative access, hydrants and water supplies, location of any infrastructure which may be affected by a fire e.g. power lines, occupied buildings, areas of natural or unmade ground, location of plant, protective clothing and pollution control equipment/material, location of drain covers and firewater containment systems, location of off-site emergency information pack. Also, the quarantine area is listed in the Key of Appendix 2 but does not appear on the site plan.
- How long will material in the quarantined area be stored for? Confirm dimensions of quarantine area.
- Will you have a thermal device/probe to monitor temperature and moisture content? Moisture should be considered in the FPMP.
- Summary of steps you must take before site can become operational again.
- The closest receptors at the Travellers site have not been listed as a receptor in the FPFM. Update/clarify why.
- Consider all combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on people, critical infrastructure and the environment) and how they will be minimised.
- More detail on how firewater will be recycled.
- Provide more details on end-of-life vehicles storage and management.

2. Dust

- Have the impacts on dust been considered on ecological receptors?
- Please provide more evidence to support Appendix D Technical Assessment (Noise and Air Quality).
- Do you have a dust management plan in place? Please submit.
- Will dust levels at the installation boundary be above levels that would cause a nuisance at receptors?
- Please submit any updated documentation in relation to the points above.

3. Noise

Please provide an update Noise assessment/provide additional information to support the conclusions made in the noise assessment. Please consider (but not limited too) the following points:

- Provide evidence/calculations to justify the proposed noise limits from the activity.
- When will noise from the plant and activities associated be assessed in accordance with BS4142:2014?