

Application form

1. In both responses to the questions on the company details and landowner details, the email and phone number has been given as 07912640464 and vicki.cooper@360environmental.co.uk which are the contact details of the former application contact.

Action: provide the email and phone contact information for both the company and the landowner. Pages 1-3 of the original Swansea Application NRW form has been updated with company and landowner details.

2. The declaration has been signed (with authorisation) by the former application contact. As they are no longer involved with the application, and to ensure that all legal requirements are met, we need the declaration to be re-signed. This can be completed by the other named person on the authorisation (Kirsty Struthers) or from a relevant person as listed on companies house (Jeremy Young). We have attached the declaration wording to be completed and resubmitted.

Action: complete the attached declaration wording Attached

Waste types

3. The application states that plastic wastes will be stored and treated, and that cardboard waste will be stored at the site. Document 25 *Waste Types Accepted* lists several wastes that could contain wastes other than plastic or cardboard.

These are:

- 15 01 05 composite packaging
- 15 01 06 mixed packaging
- 19 12 04 plastic and rubber
- 19 12 12 other wastes (including mixture of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
- 20 03 01 mixed municipal waste (dry mixed recyclables only)

The above wastes should be provided with caveats to state what wastes are being accepted. This is to ensure that the rest of the application documents are identifying and addressing the relevant risks from the proposed activity.

Action: provide caveats for the above 5 wastes to confirm what wastes are being accepted. Appendix 25 - Waste Types Accepted (V2) updated with a 2nd page including an explanation of the waste types per EWC code applied for.

Application Document List

4. Within the Application Document List, document #28 is called "Daily Environmental Checksheet" but the document provided is called "SWA ENV 009 Environmental Monitoring Record". We need to verify that the document provided is the one you intended to provide

Action: confirm what the correct document is. Environmental Monitoring Record is the correct name, documents updated.

Site condition report

5. Section 2.0 Condition of the land at permit issue of document 21 *Site Condition Report* does not contain the level of detailed information expected. There is no information on geology or hydrology of the site other than stating the site is outside of a Groundwater Source Protection Zone.

The Pollution History section gives the previous use of the site, but there is no evidence that any investigation has taken place to identify any prior pollution incidents or historical land-uses and associated contaminants- the area has been heavily mined in the past and this is not mentioned. While we are not requiring (no think it is necessary) to carry out soil or groundwater tests, a desktop study should be carried out at a minimum. A Coal Authority Report was also supplied, but no reference to this is made within the Site Condition Report.

Action: carry out further investigations and update the site condition report where relevant. Appendix 21 - Site Condition Report (v2) updated and Appendix 34 - Site Investigation Report_Jan 2013 added.

Site drainage

6. Section 3.3.2 of document 3 *Environmental Management System Summary (V1)* and document 29 *Site Drainage and Infrastructure* states an interceptor will be part of the drainage system, but no information has been provided on what type of interceptor it is, its capacity, its maintenance program etc.

Action : provide further details on the interceptor. Appendix 3 - Environmental Management System Summary (V2) and Appendix 29 - Site Drainage and Infrastructure (V2) updated with the details of the Kingspan interceptor proposed for the site.

Risk Assessment

7. We have reviewed the 23 *Environmental Risk Assessment (V1)* and 18 *SWADWGEP13 Receptor Plan* to ensure they contain all relevant sources, pathways and receptors etc. to allow us to adequately assess the risks of the proposed activity.

Action: Update your risk assessment and receptor plans with the above receptors. Appendix 23 - Environmental Risk Assessment (V2) updated and Appendix 18 - SWA-DWG-EP-13 - Receptor Plan has now had the additional receptor detail provided by NRW added to it.

Fire Prevention and Mitigation Plan

We have reviewed your FPMP (26 Fire Prevention and Mitigation Plan (V1)) and supporting plans against our guidance [NRW FPMP Guidance No. 16 Fire prevention and mitigation plan - waste management](#).

The following information has not been included within your FPMP and must be included. Explanation is given in italics where relevant :

5. Fire Prevention and Mitigation Plan contents

- The amount and type of waste received daily and how it is managed. Section 3.2.3 added
- Maximum time each type of waste will be stored on site: *Table FPMP3 does not differentiate between plastic and cardboard which have different maximum times regarding risk of self combustion* FPMP3 updated
- Maximum size of any waste stockpile - including length, width and depth: *pile sizes for the internal bays are not given* Please note there are no internal 'bays', there are bunkers between the sort plant and wash plant which collect and temporarily hold the material between the processes but not storage bays. FPMP5 added to show details of bunkers.

- Minimum separation distances used: *These are provided, however the plans do not differentiate between plastic and cardboard storage which have different distances, and does not give separation distances between bays/piles and buildings and boundary of the site.* Section 4.5.1 updated
- Clear area around the perimeter Section 4.5.1 updated
- Fire prevention techniques used, including management of hotspots, self combustion, monitoring, reporting Detailed in section 4.3.5 is that each stack is fully emptied and recorded, section 4.3.6 explains that the site operates a first in first out principle and 4.3.9 water cannons are used at least 2 times a day to douse the storage area when the outside ambient temperature is over 18°C.
- Techniques used to minimise fire spreading: *only techniques given are separation distances and fire walls and bays. No other techniques considered.* Detailed in section 4.3.5 is that each stack is fully emptied and recorded, section 4.3.6 explains that the site operates a first in first out principle and 4.3.9 water cannons are used at least 2 times a day to douse the storage area when the outside ambient temperature is over 18°C.
- All combustion products and emissions (to air, land and water) including impact on the local community, critical infrastructure and environment).
- Contact details of sensitive receptors within 1km of the site, including human receptors (i.e. hospitals, residential areas, schools) Added to section 1 Emergency Contact List
- Environmental receptors within 1km of the site (i.e. source protection, surface water)- see Risk Assessment tab for list for missing receptors Table FPMP1 updated with sensitive receptors

5. Fire Prevention and Mitigation Plan contents- site plan

- where each type of waste is stored- internal storage and skips are not given, current layout doesn't *differentiate between plastic and cardboard storage* Appendix 8 - SWA-DWG-EP-05 - Waste Storage Plan updated to show the approximate position of the internal bunkers.
- layout of buildings- document 12 SWADWGE07_2of2 Internal Plant Layout (Proposed) does not include internal layouts i.e. equipment and storage We are still receiving final concept designs from the manufacturers, as the final design is not agreed yet, this is why we have not put it on the Internal Plant Layout.
- location of plant - as comment above, pollution control equipment – Appendix 10 - SWA-DWG-EP-06_2of2 - Site Drainage Plan (Proposed) shows the position of the interceptor and in the key it states "lock off at interceptor"
- location of sensitive receptors within 1km of the site including human receptors and environmental receptors- see Risk Assessment tab for list for missing receptors Table FPMP1 updated with sensitive receptors

6. Common causes of fires and preventative measures

- No information given on Self-combustion, Plant & Hot exhausts, Damaged or exposed electrical cables, Leaks and spillages of oils and fuels Included in Table FPMP2

7. Storage times and self combustion factors

- Waste is at risk of self combustion being proposed to be stored for more than 3 months require additional measures to manage risk- *FPMP states that Unprocessed and processed wastes are stored externally, and if baled are to be stored for 6 months. It is not clear what breakdown of this is cardboard and what is plastic, information is needed on what additional measures are to be used.* Table FPMP3 updated by material type

8. Managing waste material stacks

Clarity is needed on the stack sizes as:

- The information given in Table FPMP4 stack sizes doesn't match up with 20 SWADWGEP15 Waste Storage Concept plan. FPMP4 corrected
- In Main area- Table FPMP4 states the capacity of each stack is 800m³ and there are 13 stacks. SWADWGEP15 shows 8 blocks of 4 stacks totalling 32 stacks AND 4 smaller stacks which are not listed within table FPMP4. FPMP4 corrected
- Table FPMP4 gives 18,400m³ of waste stored which is roughly in line with the stated tonnage given elsewhere in the application of 20,000tonnes. However, SWADWGEP15 gives a minimum of 33,600 not including the 4 small stacks of unknown size. FPMP4 corrected, total is 36,800m³, drawing no SWADWGEP15 corrected.

11. Enclosing stacks using bales and walls

- It is stated that the bay walls provide fire resistance for 120 mins, but no evidence of the product specification has been included. Section 4.5.3 updated with A1 rated concrete.

12. Waste stored within a building

- No information has been provided regarding waste stored with the building. Section 4.3.12 added

13. Waste stored in containers

- No information has been provided regarding waste stored in containers- Section 3.2.4 states residual waste will be stored in a skip. No information given on where this is stored, its size etc. Clarification is needed. Section 4.3.13 added

15. Seasonality and waste stack management

- Information required in this section is not included Section 4.3.14 added

16. Monitoring and turning of stacks

- Information required in this section is not included Section 4.4.5 added

17. Fire detection

- Information provided in the FPMP on detection of fire only includes the inside of the building. No information is given for the waste stored outside. Section 4.7.3 added

20. Water supplies

Clarification is required on water supplies as:

- Section 4.11.1 references a 774m³ tank, however it also states that this is for the fixed fire sprinkler system which is only inside the building. Section 4.11.4 references the firewater tank again, but here alludes it to be used outside. The firewater tank does not contain enough water as per the guidance. 4.11.1 updated to include the new water tank for the fire cannons - Additional 30,000 litre tank for use with water cannons.

- Section 4.11.4 references also references 7 hydrants in the vicinity, but does not include information to demonstrate they are suitable for use. **Section 4.11.4 updated**
- Section 4.11.2 references has a 1,050m³ tank to hold used fire water, which could be recycled- this needs to be agreed to by the FRS. The generally don't agree to this due to the potential contamination. **This is being discussed with FRS, we are not relying on it in the calculation of water supply, however we have left 4.11.2 in so that the conversation can continue with FRS.**

Action: update the FPMP with the above missing information

Application fee

8. The fee paid for this application is incorrect. £12,354 was paid for the permit Base charge for a bespoke waste permit and assessment of the Fire prevention and mitigation plan.

A further £897 is required for assessments of Site of Special Scientific Interest (SSSI) (£306), other protected sites (£201) and the proposed discharge to water (£390).

Action: pay the additional fee of £897.

£507 extra paid (SSSI-£306 + protected sites-£201)

We were told via email 15/08/2024 that as the discharge forms part of the bespoke permit application, a separate discharge fee was not needed (see below).

From: Clee, Owen <owen.clee@cyfoethnaturiolcymru.gov.uk>

Sent: 15 August 2024 10:54

To: Vicki Cooper <vicki.cooper@360environmental.co.uk>

Subject: RE: PAN-026035 J and A Young (Leicester) Limited update on queue status

Dear Mrs Cooper,

Thank you for your patience in waiting for a reply. From reviewing your summary provided in the email the discharge is integral to the permit application in regard to the storage of wastes. This means the discharge forms part of the bespoke permit application where a water discharge permit and fee is not needed.

Kind regards,

Enw / Owen Clee

Teitl swydd / Permitting Officer 2

Adran / Waste Permitting Service

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



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From: Vicki Cooper <vicki.cooper@360environmental.co.uk>
Sent: Wednesday, August 14, 2024 3:06 PM
To: Clee, Owen <owen.clee@cyfoethnaturiolcymru.gov.uk>
Subject: RE: PAN-026035 J and A Young (Leicester) Limited update on queue status

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi Owen

Thank you for the email below. I did ask Huw a separate question regarding whether NRW will require a separate water discharge fee along with this application and I haven't had a response from Huw. Would you be able to look at the attached email and respond please? I wouldn't want this to delay anything once the application is picked up.

Thank you
Vicki



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