

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Company Secretary
Kilsby & Williams,
Cedar House,
Hazell Drive,
Newport,
Gwent,
NP10 8FY

CC: gareth@environmentalfocus.co.uk

Application number: PAN-002660

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 **19/06/18**.

The information requested should be sent to the following address by **15/11/2018**.

Information should be sent to:

magda.leonowicz@naturalresourceswales.gov.uk

Name	Date
Magda Leonowicz	01/11/2018

Authorised on behalf of Natural Resources Wales

Schedule

1. Enclosing stacks using bays and walls

The Fire Prevention and Mitigation Plan (FPMP) guidance states that 'If you use bays or walls between stacks to store waste materials they should be of sufficient height, thickness and construction that offer a fire resistance period of at least 120 minutes to allow waste to be isolated to stop fire spreading and minimise radiant heat.'

Action:

Please specify the material the walls of the bays are made off and confirm they are 120 min fire resistance.

2. The distance between the building and the stockpile

The distance between the pre-depollution ELV storage area and the depollution building wall has not been provided in the FPMP.

Action:

Please provide this information.

3. Times of storage

In the section 'External Heating' in the FPMP you stated: 'To prevent self-combustion of these wastes (the skips that contain the general waste, wood and tyres) they will be removed from site routinely every 8 weeks at a maximum (...)'.

Whereas, in the 'Additional information' section, you stated '1 skip is for wood waste, 1 skip is for tyres and 1 is for general waste. These skips typically take 4-6 weeks to fill and are removed from site as soon as they are full.'

Then in the same paragraph you also said that 'The tyre skip will typically hold 2T of tyres and is removed from site every 6-8weeks as a maximum.'

And finally, in the 'Spontaneous combustion and storage' section you stated 'The following applicable materials should not be stored for longer than 3 months:

- Wood and wood products
- General waste including RDF and fines

The storage times of waste in skips vary and are not specific.

Action:

Please provide the maximum storage times for individual waste streams in skips.

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Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

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

4. RDF

In the 'Spontaneous combustion and storage' section in the FPMP, you stated that RDF waste will be accepted at the site as unpermitted waste.

RDF consists largely of combustible components of such waste, as non-recyclable plastics, paper cardboard, labels, and other corrugated materials. RDF requires additional mitigation measure, but this waste has not been mentioned anywhere else in the application.

Action:

Please clarify if the RDF waste will be accepted at the site?

5. Firewater management in the FPMP

5.1 In the 'Site Process –in the event of a major fire incident' section you stated 'The damping down of the waste material would be undertaken by the FRS. This area of concrete would be enclosed with a clay bund to prevent any leached fire water escaping the immediate area if required.'

Action:

Please clarify if the clay bund will be placed in the area where the dumping of waste materials takes place only? How will run off be prevented from escaping the site boundary.

5.2 Controlling fire water will be a priority during a major incident. Tankers will be used to pump any significant pooling/flooding waters away to protect any environmental receptors locally

Action:

Please clarify whether the tankers are kept at the site or will they be brought from elsewhere? If they are not kept at the site, how long would it take to bring them to the site? What is the volume of water the tankers would be able to pump? Please provide the evidence showing that the capacity of tankers is sufficient.

5.3 In the same section you stated that ‘the outlet to the drainage channel will also be sealed using a dam mat to prevent any flow of fire water getting into the ground via the drainage system’.

Action:

Please clarify whether the dam mat will be placed where the run off enters the drainage system or the outlet of the drainage will be blocked to prevent water flowing to the soakaway.

6. Proposed sewers on the site plan

The drainage plan shows the proposed surface water sewer and the proposed foul water sewer. These have not been mentioned in the application.

Action:

Please clarify if these are in use and a part of the permit?

7. Available water supplies

In the FPMP you stated that there will be 10,000L of water available at the site. Is there any monitoring plan to check that the tank is always full?

Action:

Please provide this information.