

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Mr. N Jones
Airfield Metals Limited
10 Sageston Fields
Sageston
Tenby
SA70 8TQ

Application number: PAN-005167

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 **02/04/19**.

The information requested should be sent to the following address by **04/06/2019**.

Information should be sent to:

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

OR

Hannah.loughlin@naturalresourceswales.gov.uk

Name	Date
Hannah Loughlin	21/05/19

Authorised on behalf of Natural Resources Wales

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Schedule

Environmental management system

Section 6.5.1 Site surfacing and drainage

More detail is required in respect of the site drainage and infrastructure for the site. This should include but not be limited to information in relation to the following:

- The drainage set up for the impermeable surface and the hardstanding.
- The drainage set up inside the buildings.

Action:

Please update section 6.5.1 to fully outline the site infrastructure and site drainage.

6.4 Vehicle dismantling

No information as to how the vehicles are dismantled has been provided. A full and detailed explanation as to how this operation takes place is required.

Action: Please update section 6.4 outlining how the depolluted vehicles are dismantled

7.1 permitted activities

This has been copied directly from the site's current SRP. This should reflect operations on site. No information has been given as to what treatment operations other than vehicle depollution will be taking place.

Action: Please confirm what treatment operations will be taking place on site and update the relevant sections of the EMS to reflect this.

Waste types to be accepted

Within the EMS the following waste codes have been listed as being accepted

16 01 03 end of life tyres

16 01 04 end of life vehicles

16 01 06 end of life vehicles container neither liquids or other hazardous components

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16 01 07 oil filters
16 01 11 brake pads containing asbestos
16 06 01 lead batteries
16 06 05 other batteries and accumulators
And within the Fire Prevention and Mitigation Plan (FPMP) the following wastes codes are listed as being accepted
16 01 03 end of life tyres
16 01 04 end of life vehicles

Is it the sites intention to directly accept all of the wastes listed in the EMS or will some be residual wastes/wastes removed from the ELVs to be depolluted on site?

Action: Please confirm which wastes the site is intending to accept. If you are intending to accept all codes listed in the EMS, the FPMP will need to be amended to include all of the wastes codes and the relevant information in respect of these codes.

If you are intending to only accept the codes listed in the FPMP the EMS will need to be amended.

Both documents should be a true reflection of the wastes intended to be accepted on to site.

Environmental risk assessment

The risk assessment submitted is generic in the measure in place to prevent the waste facility having a negative impact upon the protected sites that are within relevant distance of the site. Namely:

- Pembrokeshire Marine SAC and Pembrokeshire Bat Sites and Bosherton Lakes SAC within 1km
- Carew Castle SSSI and Milford Haven Waterway SSSI with 2km

The reasons for designation and the site management plans should be taken into consideration when assessing the potential risk from the site and for determining what measures the site should put in place at the site to protect the designated sites. The designations, site management plans and associated documents can be found on our website [here](#)

Fire prevention and mitigation plan

The Fire prevention mitigation plan submitted with the application does not meet with the guidance "Fire prevention & mitigation plan guidance – waste management" further information is required in relation to the following points:

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These responses will vary dependent upon the answers to the above question with regards to waste codes, all wastes to be accepted on site must be covered by the FPMP.

- The amount and type of waste received daily and how it is managed (waste code dependent)
- The total amount of waste and the types and forms that they are stored on site at any one time – the form in which the waste will be stored has not been clearly outlined.
- The maximum size of any waste pile (in m³), stipulating maximum length, width and depth – total volumes of some waste have been given. We require the full dimensions of all the stacks/piles on site.
- The minimum separation distances between waste piles or storage area – typical separation distances have been given, however no specific distances have been stated. These need to be calculated using the graphs outlined in the guidance.
- Contact details of sensitive receptors within 1km of your site – only some businesses within 1km have been given. There are several hundred houses and numerous businesses within 1km these have not been included in the FPMP. We would not expect the contact details of all those situated within 1km of the site but measures to raise the alarm with all those situated within the 1km zone should be included. If needed you may need to check with the Local authority and their emergency planning procedures.
- Consideration should be given to reducing firewater run-off generated – using sprays and fogs
- Consideration should be given to separating burning material from the fire to quench it with hoses or in pools or tanks of water.
- Consideration should be given to the types of materials stored on site, the form in which they are stored, and the length of time required to extinguish them during a fire.

Site plan

- Access points around the site perimeter to assist firefighting – no access points other than the main entry to the site have been identified.

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- Any watercourse, borehole or well located within or near the site – there is a pond and a watercourse within 250 metres of the site and the site is within a SPZ 1 these have not been identified on any of the maps within the FPMP.
- Areas of natural or unmade ground.
- The location of plant, protective clothing and pollution control equipment and materials.
- The location of drain covers and any pollution control features such as drain closure valves and fire water containment systems.

Common causes of fire and preventative measures

- Batteries within waste deposits – not addressed or highlighted as a risk
- Batteries in ELVs – not addressed or highlighted as a risk

Managing waste material stacks and separation distances

As previously outlined stack sizes and separation distances have not been outlined.

- Stack length and separation distances should be in line with the relevant graph in the guidance, as ELVs will be stored it must be ensured that each vehicle is accessible from at least one side so that any fire can be fought, and unburnt vehicles can be moved.

Baled waste storage

It is stated that waste will be baled and stored on site, but the information required in respect of baled wastes as outlined in the guidance has not been addressed in the FPMP.

Waste stored within a building

The vehicle depollution is to take place within however it is unclear as to whether any waste will be stored in the building. If waste is to be stored in the building at any point the FPMP should address this in line with the FPMP guidance.

Waste stored in containers

It is outlined that batteries are to be stored in containers. However, this has not been addressed in line with the guidance.

Layout of waste stacks on your site

- Location of potential ignition sources on your site – this should include any plant and equipment used on site.
- Location of occupied buildings and high asset value equipment and plant

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- Escape and evacuation routes around your site – these must not be compromised by stack layout
- Permitted amounts of wastes and types of waste allowed on site – see previous comments with regards to what wastes are accepted on site.
- Operational practicalities such as movement of vehicles and designated routes.

Seasonality and waste stack management

- Technical assessment that shows there is confidence in the activity being viable in foreseeable market conditions – this should include the suitability of materials, the resilience of the supply chain and end user outlets.
- More detail is required on stock management, how the first in first out principle will be achieved and how it is ensured that waste is stored no longer than outlined in Table 1 of the guidance.

Monitoring and turning of stacks

- Staff must be trained to detect and manage hotspots – the FPMP outlines that staff will look out for hotspot but there is no information as to how they will identify the hotspots and then manage them.
- Monitoring of piles for changes of temperature and moisture content – this needs to be considered for all types of waste to be stored on site and if it is felt it is not necessary to do this justification needs to be provided.
- If monitoring is to take place information is required as to what equipment will be used to do the monitoring, what indicators will be used in relation to temperature and moisture content and what actions will be taken as a result of these indicators.

Fire detection and fire suppression systems

Deciding what type of detection and suppression system to use on site, the following should be considered when deciding what systems to be used and if discounted information should be provided to show how this decision was made and why the systems are unsuitable for the site.

- The fire and rescue service may not be able to enter the building during a fire

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- A suppression system may not extinguish a fire, although it may prevent a fire spreading and then allow the fire to be fought effectively.
- The water supply to a fire system is reliable and adequate at all times
- Smoke and heat detectors including temperature probes
- Spark, infrared and ultraviolet detection
- Sprinklers
- Manual open deluge systems
- Deluge/water spray systems
- Water monitors/cannons/curtains

Firefighting strategy

- Use of portable water carriers/bowlers – this has not been considered. If it has been considered and deemed unsuitable for this site this should be outlined.
- Adequately trained staff available – staff training has not been outlined and the availability of the trained staff has not been addressed
- Finances available for additional resources – no information provided on this.

Water supplies

- You must demonstrate that there is a sufficient supply of water to manage a worst-case scenario incident – the FPMP states that 2000 litres of water are required to put out a fire in the largest stack on site. Based on the limited stack information given our calculations show that 360,000 litres are required. Please confirm the size of the largest stack on site and the volume of water required to put this out.
- Alternative water supplies – water bombs are listed but this is only 4000 litres. Other alternative sources should be considered in the event that the hydrants are unable to provide sufficient water.

Managing fire water run-off

- Surface water bodies – there is a pond within 20 metres of the site and a river with 250 metres neither have been addressed in the FPMP
- Fire water run-off – this is going to sump however, the volume of water the sump can contain is far less than the amount required to put out a fire in the largest stack. More information is required as to how this run-off will be managed

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- No secondary or tertiary containment has been considered – information has been provided in relation to a contractor who could provide booms if needed but no other form of additional containment has been outlined.

Quarantine area

- This should have a separation distance of a minimum of 6 metres from any water pile/stack – this information has not been provided.

During and after an incident

- Diverting incoming wastes to alternative sites during a fire – not considered
- Having a plan for how you will notify those who may be affected by a fire – as with the previous comments in relation to sensitive receptors local residence have not been considered in respect of this, it is not practical to ring all potentially impacted parties.

Action: Please amend the FPMP so that it addresses all the points raised above and complies with our current guidance.

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