

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 **29/11/2019**. Information should be sent to:

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

Name	Date
Kirsty Thomas	19th November 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 the following points:

- 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. The lists of wastes in the materials inventory in the Fire Prevention and Mitigation Plan does not match that of the wastes listed in the Main Installations reports. The full lists of waste should also be reflected in the site plan. Can you also confirm the stockpile for wood as I don't believe the site are actively accepting this material?
- 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. You have identified the nearest fire hydrant which is some distance away but not sure if this supply would cover a worst case scenario. You need to show there is enough water to put out a fire on the largest stack on site as in line with the FPMP guidance. Is this hydrant used for the whole of the industrial estate? You need to provide more details on how you ensure firewater is prevented from discharging to ground, sewer or soakaway. You have not provided details on firewater management for areas outside the process building/ stockpile areas. Please provide detail.
- 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. Include a site plan that shows the location of the off-site emergency pack. Include on the site plan where are ELV's are stored. As above, each waste code should be labelled on the site plan.
- Will you have a thermal device/probe to monitor temperature and moisture content? Moisture should be considered in the FPMP. We would expect monitoring of temperature and moisture. I can see you have measures in place to monitor temperature but what about moisture? This needs to be considered too. Also, provide a copy of the work instructions listed on how staff will identify hotspots.

2. Dust

- Will dust levels at the installation boundary be above levels that would cause a nuisance at receptors? **The dust deposition for nuisance dust is 200mg/m²/day (Nuisance levels). Can you confirm the dust levels from the proposed activity would be below this criterion? Provide Justification.**

3. Additional

- Please submit a copy of the trade effluent consent from Welsh Water for the discharge from the wash water treatment plant (emission point S5 in the integrated scrap metal recycling centre). You also mention in your response that firewater can be treated in the wastewater treatment plant and possibly discharged to sewer. You will need an agreement in principle from the sewage company before including this measure in your fire prevention plan.