

Natural Resources Wales permitting decisions

Celsa Manufacturing (UK) Limited- Tremorfa Melt Shop

Decision Document

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Variation

The variation number is: EPR/TP3639BH/V008

The operator is: Celsa Manufacturing (UK) Limited

The Installation is located at: Tremorfa Melt Shop, Tremorfa Works, Seawall Road, Cardiff, CF24 5TH

We have decided to issue the variation for Tremorfa Melt Shop operated by Celsa Manufacturing Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

The normal variation applied for is for the following:

Variation 01 – Consolidation of the waste process permit (EPR/DP3699FM) on the Rover Way site into the New Melt Shop permit (EPR/TP3639BH). This will involve no process changes. It is a simple consolidation of two separate permits into one permit document.

Variation 02 – Variation to include a new integrated scrap metal recycling centre (incorporating oversize material processing, material processing via vibro-flume and material processing via Eddy Current Separation(ECS) on the Rover Way site. The processing of the scrap metals will be undertaken wholly within a newly designed and constructed steel portal frame building. Unprocessed and processed material stockpiles will not be within the building, vehicles will be used to transfer material to and from the process building.

Variation 03 – Variation to remove Carbon monoxide limit from New Melt Shop permit (EPR/TP3639BH) in relation to emission point A1 (100 mg/m³, hourly average, continuous monitoring) in-line with current BAT reference documents (BREF). This is

a request to bring the current permit in-line with other steel operators across the UK. It would not affect emissions from the current process.

Variation 04 – Variation of the boundary of the current New Melt Shop permit (EPR/TP3639BH) to include the existing waste process permit (EPR/DP3699FM) and the proposed new integrated scrap metal recycling centre. This is an extension of the permit boundary to include the new integrated scrap centre and the existing waste process (EPR/DP3699FM).

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.
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Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Key issues of the decision

Receipt of application

Consultation

The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

We do not routinely consult on normal variations such as this.

A copy of the Application and all other documents relevant to our determination (see below) are available for the public to view on our online public register (<https://publicregister.naturalresources.wales/>).

Operator

We are satisfied that the operator is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.

The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities:

The Tremorfa Melt Shop consists of two regulated facilities comprising the Chapter 2, S2.1, Part A(1)(b)(i) installation and a waste operation.

The Chapter 2, S2.1, Part A(1)(b)(i) installation produces steel billet from scrap using an electric arc furnace and continuous casting. The plant was newly built in 2006 with a design capacity of approximately 1.3 million tonnes of finished billet per year (27,000

tonnes per week). The steel plant can operate 24 hours per day, seven days per week, for up to 52 weeks per year with planned maintenance occurring as and when required.

The waste operation is involved with the storage and processing of by-products from the adjacent CELSA steelworks. The permitted operations comprise a waste transfer station, mill scale treatment area, and a storage area for the weathering of processed Electric Arc Furnace (EAF) slag. EAF slag is a by-product of the EAF process and when weathered can be sold as a useful mineral aggregate.

Following the permit variation, the permit now regulates waste operations from the metal recycling site (MRS) following the consolidation of the waste permit EPR/DP3699FM on the Rover Way site. Operations remain the same. The consolidated permit also regulates another directly associated activity, the newly built integrated scrap metal recycling centre. The new integrated recycling centre recycles, both on-site and off-site, 36,000 tonnes per annum of fines which are separated from feedstock material and circa 95% of which are currently sent to landfill. This will reduce the landfilling of fines (<70 mm material which is screened out of any incoming scrap) to near zero. The type of waste is EWC code 19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11. This is more commonly known as scrap screening fines.

Legislation

NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources

All applicable European directives have been considered in the determination of the application.

The site

The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility including discharge points.

A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.

As part of the permit variation, the site boundary has been increased to incorporate the area of land where the existing waste operations from the metal recycling site (previous permit EPR/ DP3699FM) and to include the area where the new integrated scrap metal recycling centre will be located). The area also includes a new discharge point to sewer S5. This consists of trade discharge from a Waste Water Treatment Plant WWTP serving the Vibro Flume in the new integrated scrap recycling centre. The operator has a trade effluent consent from Dŵr Cymru Cyfyngedig DCWW for this trade discharge to sewer. There is also another variation application for the site to construct a slag treatment process and asphalt production plant within the recycling site area. This application is subject to a separate subsequent determination. Cumulative impacts such as noise will be considered sequentially during the determination of the permit variation to follow this one.

Site condition report

The operator has provided a description of the condition of the site.

We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).

The site condition report covers the new area of land incorporated in this permit variation where the waste process activities from the mixed recycling facility and new integrated scrap metal recycling facility will be located.

Biodiversity, Heritage, Landscape and Nature Conservation

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .

A full assessment of the application and its potential to affect the site(s)/species/habitat has been carried out as part of the permitting process. We consider that the application will not affect the features of the site/species/habitat.

Only fugitive dust and noise emissions are expected from the site. There are no direct emissions to air, water or land and thus no air quality modelling is required.

Nearby ecological reports include the Gwent Levels SSSI, Severn Estuary SSSI and the Severn Estuary SAC/SPA/RAMSAR, and a number of locally designated wildlife sites.

The processing of the scrap metals will be undertaken wholly within a newly designed and constructed steel portal frame building. Vehicle movements to and from the building to the external unprocessed and processed stockpiles are not within the building. Release of particulate matter (dust) during handling and processing of waste is possible, however with the main processing activities taking place inside the building the risk of dust will decrease and there will be control measures in place. Control measures include; drop height reductions, wind sheltering, wet suppression will be employed (where possible). Good housekeeping driven by regular site inspection, road sweepers employed, daily visual inspections carried out etc. Permitted waste types on site do not include dust, powders or loose fibres.

The variation will not include any new point source emissions to air, surface water or groundwater. A water discharge from the wash plant – wastewater treatment plant associated with the vibro-flume in the integrated scrap metal recycling centre will discharge to sewer. A trade effluent consent is in place for this discharge to sewer. All drainage systems are to be connected to the Welsh Water foul sewer.

The integrated scrap centre includes a roof rainwater harvesting system that features a soakaway when the maximum storage volume of rainwater have been exceeded. The discharge to ground will only consist of harvested rainwater and rainwater from the roof level gutters.

There are no point source emissions, no NOx emissions or any other toxic pollutants.

Noise is not considered to be a significant problem from the facility and therefore should have no impact on designated sites/species. The proposed new scrap metal sorting machine will be installed within a new building on the site which will be designed to meet BAT. Material is delivered to site by lorry which is already the current situation and unlikely to significantly change. Outside the building, main noise sources are; loading of the hopper, vibratory screens and dropping of material. Inside the building, main noises include motors associated with the conveyors, vibration screens and wheeled loaders moving the sorted materials. A noise assessment was carried out by tnei consultancy to report measured baseline data and operational noise level predictions. The assessment concluded that the operational noise from the proposed activity is unlikely to cause any adverse impact. The result provided indicate a low level impact rating.

A noise and vibration management plan will be in place. Some control measures on site will include the following:

- Equipment/vehicles etc will be regularly maintained to ensure no equipment will produce excessive noise.
- Silencers will be fitted to all machinery (where possible).
- Noise generating equipment to be shut off when not used.
- Speed limit of 10mph will be in place at the site.

Given the details above the new proposed activities taking place, are not likely to be a significant impact on the designated sites.

Environmental Risk Assessment

Air

The Applicant has assessed the Installation's potential emissions to air and the potential impact upon human health. There are no direct emissions to air, only fugitive emissions of noise and dust from vehicles and deposition of materials at the new

integrated scrap recycling centre. All waste processing at the integrated scrap recycling centre will take place within a building.

Due to operational improvements in scrap metal handling and processing the annual average dust emissions from the operations on site have generally significantly reduced between 2012 and 2016. Given the scrap centre processing operations are wholly undertaken within a building there is no reason to suggest that the nuisance threshold for dust of 200 mg/m²/day will be exceeded at any of the previously identified receptors.

The site is planned to operate Monday to Friday 06:00 – 18:00 with no operations on Saturday, Sunday and/or Bank Holidays. This equates to 253 working days (3,036 hours per annum) or 35% of the year.

All processing activities are to be undertaken wholly within a building. The stockpiles from which materials are delivered, moved from and moved to are located around the building edge. All activities will be undertaken in accordance with the current best practice standards as set-out within the Dust Management Plan.

There is no evidence that the proposed operations, the nature of the materials being handled and the processing of these materials wholly within a building will lead to dust levels which could reasonably cause a nuisance.

In addition, the closest residential receptor (the travellers site) is screened from the site operations by approximately 100 metres of elevated ground (maximum 13 m AOD) that is partially composed of the Motocross Centre MX activity, trees and hedgerows. This is likely to act as a natural barrier to any potential wind-entrained dust (Figure 6).

In-line with current EPR guidance, Celsa has prepared a dust management plan as the activity is within 500 metres of a defined sensitive receptor. In consideration of the on-site sources, the pathway and the receptor dust levels at the installation are considered unlikely to cause a nuisance at the identified receptors.

The variation is also to remove the current Carbon Monoxide Emission Limit Value (ELV) from New Melt Shop permit in relation to emission point A1 (100 mg/m³, hourly average, continuous monitoring) in-line with current BAT reference documents (BREF). This is a request to bring the current permit in-line with other steel operators across the UK. It would not affect emissions from the current process.

The revised BATC (03.2012) BREF does not include any ELVs in relation to Carbon monoxide emissions to air for the sector and screens out using the current air environmental risk assessment.

We are in agreement with the operators assessment.

Emission limits

The variation will not include any new point source emissions to air, so no new emission limits are necessary. Existing emission limits on the permit will remain but with the removal of the Emission Limit Value (ELV) for Carbon Monoxide as in line with current BAT reference documents (BREF). Annual monitoring will be required as Carbon Monoxide is an indicator of good combustion.

Water

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

The variation will not include any new point source emissions to surface water or groundwater. All drainage systems are to be connected to the Welsh Water foul sewer. A discharge consent will be help in relation to this discharge.

The integrated scrap centre includes a roof rainwater harvesting system that features a soakaway when the maximum storage volume or rainwater have been exceeded. The discharge to ground will only consist of harvested rainwater and rainwater from the roof level gutters.

The site surfacing has been designed to comply with the requirements of Sector Guidance. This includes an engineered surface composed of graded slag and geotextile with six concrete entry ramps providing access to each of the roller shutter entrance points into the building. The design of the tertiary containment surfaces (for all operational areas) has considered collection surface water capacities, surface thicknesses, strength/reinforcement, falls, materials of construction, permeability, resistance to chemical attack and inspection and maintenance procedures. Impervious surfaces, spill containment kerbs, sealed construction joints and a connection to a sealed drainage system (that discharges to sewer) are not warranted in this area due to the lack of stored hazardous materials and the nature (cleanliness) of the incoming/processed scrap metal. Site surfacing will be hardstanding.

The permit specifies that all non-hazardous waste must be stored and treated on a hardstanding or an impermeable surface with sealed drainage.

The vibroflume and associated wash water treatment system shall be located on an impermeable surface with sealed drainage with engineered bund(s) with the capacity to contain 110% of the largest volume vessel and 25% of the combined volume of all the vessels in the bund in case of spillage. The containment area shall be regularly inspected.

Where equipment is installed (treatment of waste) this shall be located on an engineered impermeable surface within a building. There is also a quarantine area on site for unacceptable waste/burnt waste which is also situated on an impermeable area with sealed drainage.

In the event of a fire, firewater will be generated. The internal gradient of the processing centre floor directs any run-off into a central drainage and sump system. Material will be pumped into storage tanks via a pump connected to the sump. Contaminated water will be contained in either the sump or water treatment tanks. No firewater should escape the building.

With respect to groundwater the site is located on Made Ground (unclassified), superficial deposits (Secondary Aquifer) and bedrock deposits (Secondary B Aquifer).

The site is not within a Source Protection Zone (SPZ). With regards to tertiary containment systems the site surfacing (used for the storage of the clean scrap metal) has been aligned to the BREF Iron and Steel Production (Scrap yards and handling) (pp.37) and Part A(1) Sector Guidance (S2.01) Guidance for the Production of Coke, Iron and Steel. Given the low likelihood of fire (due to the limited combustible nature of the stored materials) and the lack of defined preferential pathways (i.e. drains, service trenches etc.) from the site to local receptors the risk has been assessed as low. If in the unlikely event there was a fire and fire water was deployed (rather than controlled burn) water would be contained (as far as possible) using on-site materials and then subject to removal by tanker for off-site disposal or, after consultation with Dwr Cymru Welsh Water, discharged to sewer. The key mitigation measure would be the prompt removal of standing water to reduce infiltration. The potential impact on the Secondary A Aquifer (Tidal Flat Deposits - Clay, Silt and Sand) would be minimal.

Internal consultation with our Geoscience team concluded that based on the information available, the risk posed to groundwater from the proposed activities is low.

From the consolidation of the waste process permit EPR-DP3699FM, the permit EPR-TP3639BH includes the existing discharge to soakaway. There is no change in the discharge to soakaway and will be included in in the Melt shop permit EPR-TP3639BH.

Emission limits

We have decided that emission limits should not be set for the parameters listed in the permit variation. No emissions limit have been set for the new discharge to sewer S5. A trade effluent consent has been obtained by the sewerage undertaker for this sewage discharge and is effective.

Soil

The operator has provided a description of the condition of the site for the new area of land to be incorporated into the installation site boundary.

We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).

Odour

Based upon the nature of the proposed new operations, the wastes being stored, handled and treated and their location (in relation to sensitive receptors) no significant odour issues are anticipated. Thus, an odour management plan has not been produced.

Noise

Noise is not considered to be a significant problem from the facility. The proposed new scrap metal sorting machine will be installed within a new building on the site which will be designed to meet BAT. Material is delivered to site by lorry which is already the current situation and unlikely to significantly change. Outside the building, main noise sources are; loading of the hopper, vibratory screens and dropping of material. Inside the building, main noises include motors associated with the conveyors, vibration screens and wheeled loaders moving the sorted materials. A noise assessment was carried out by tnei consultancy to report measured baseline data and operational noise level predictions from the new integrated scrap metal recycling centre. The assessment concluded that the operational noise from the proposed activity is unlikely to cause any adverse impact. The result provided indicate a low level impact rating.

At all of the Noise Assessment Locations, with the exception of NAL04, the predicted operational noise levels from the consented Scrap Metal Sorting facility are more than 10 dB below the existing ambient sound levels, therefore, no further assessment required at these locations. The calculated noise emission level at NAL04 was within 10 dB of the existing ambient sound levels, therefore additional assessment was required. After both a quantitative and qualitative assessment, the noise rating Level from the plant was 1 dB above the background sound level. It was found that the operational noise from the proposed process is unlikely to cause any adverse impact.

Internal consultation with AQMRAT confirm that the methods used for the assessment and the calculations used to assess the impacts are acceptable.

A noise and vibration management plan will be in place. Some control measures on site will include the following:

- Equipment/vehicles etc will be regularly maintained to ensure no equipment will produce excessive noise.
- Silencers will be fitted to all machinery (where possible).
- Noise generating equipment to be shut off when not used.
- Speed limit of 10mph will be in place at the site.

Fugitive emissions

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions. As detailed in information above, it has been concluded that fugitive dust emissions are likely to cause a nuisance and the site will have a dust management plan in place which will be incorporated into the operating techniques of the permit and specific conditions in place.

Monitoring

Monitoring conditions are to remain the same but with a change to the CO monitoring requirements. As the Emission limit for CO has been removed, the monitoring requirements have been amended to annual monitoring instead of continuous monitoring. The monitoring standard for CO has been updated to BS EN 15058.

There are no monitoring requirements set for the new sewer discharge S5 -New Integrated Scrap Metal Recycling Centre - Wash Plant Wastewater Treatment Plant discharge for foul sewer.

The consolidation of the permit EPR-DP3699FM include a discharge to soakaway with set emission limits and monitoring requirements. These are to remain unchanged and incorporated into the permit EPR-TP3639BH.

The monitoring standards have been updated to the most relevant and applicable standards for air and water monitoring requirements.

Reporting

Reporting requirements are to remain unchanged but with the addition of reporting of annual waste tonnage and reporting on the discharge to soakaway on plan 3 in schedule 7 (15 – Sampling Point and Discharge Consented Point 1) as per the permit EPR/DP3699FM. This will now be reported under the consolidated permit EPR/TP3639BH.

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.

The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility.

We consider that the emission limits included in the permit reflect the BAT for the installation.

The permit conditions

Updating permit conditions during consolidation

We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit(s).

The operator has agreed that the new conditions are acceptable.

Raw materials

We have specified limits and controls on the use of raw materials and fuels.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

A list of waste types can be found in Table S2.2, S2.3, S2.4 and S2.5 of the permit. As part of the permit variation, S2.4 has been added as this lists the waste types at the new integrated scrap metal recycling centre. S2.5 is the lists of all waste types accepted previously in the permit DP3699FM for the metal recycling site (mixed MRS). Tables S2.2 and S2.3 remain the same.

Fire Prevention Mitigation Plan

A fire prevention mitigation plan was submitted as part of the permit variation assessing the fire risks and prevention methods for the new integrated scrap metal recycling centre. The FPMP was reviewed several times following revisions of the report being provided and consultation with the local Fire and Rescue Service was also undertaken. NRW are satisfied with the FPMP for the integrated scrap metal recycling centre.

An improvement condition has been added to the permit for a FPMP to be provide for the rest of the site where waste activities/storage are taking place.

Improvement conditions

Based on the information on the application, we consider that we need to impose improvement conditions. Details of the improvement conditions used can be found at Annex 1.

Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.

These descriptions are specified in the Operating Techniques table in the permit.

Environment management system

There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

Technical competence

Technical competency is required for activities permitted.

The operator is a member of an agreed scheme. The proposed technically competent person is Mr. Richard O'Neill:

- Certificate of Technical Competence: Level 4 in Waste Management Operations – Managing Treatment Hazardous Waste (4TMH) – 06/11/2012, Serial No. 17186/11/1, Certificate No. 12815.
- Operator Competence Certificate: Level 4 in Waste Management Operations – Managing Treatment Hazardous Waste (4TMH) – 06/11/2012, Certificate No. OCC3418.
- Continuing Competence Certificate: TSH/TMH awarded 24/07/2017. Expires 24/07/2019. Certificate No. CCC14850

Registration for new/renewed continuing competence certificate qualifications has been undertaken and will be regulated and verified by the site officer as part of NRW's regulation procedure.

All site Operatives will be made aware of the requirements of the EPR Permit and will be briefed as to the content of the Environmental Management Plan and the Fire Prevention and Mitigation Plan.

Relevant convictions

Our Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.

The operator satisfies the criteria in RGN 5 on Operator Competence.

Financial provision

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

The financial provision arrangements satisfy the financial provisions criteria.

OPRA

The OPRA score at permit issue is 193 (installation Opra).

ANNEX 1: Improvement Conditions

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC4	The operator shall submit a written Fire prevention and mitigation plan (for the activities A2, A3, A9, A11) to Natural Resources Wales.	07/05/2020 or otherwise agreed in writing with Natural Resources Wales
	The Fire prevention and mitigation plan must be produced in line with the standards set out in Fire prevention and mitigation plan guidance – Waste.	

ANNEX 2: Consultation Responses

A) Consultation on the Application

The Application has been consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

1) Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from Fire and Rescue Service South Wales	
Brief summary of issues raised:	Summary of action taken / how this has been covered
Water supplies The location of the hydrant is not clearly marked on the appendix, if it is the orange dot. this would appear to be on the external border of the site and be appropriate for use. Can the operator confirm the flow rate/size of the hydrant please? Can details of the water well also be included within the plan as well please for clarification. Water supplies will need to be included as a written statement within the FPMP	FPMP updated to include details on water supply, including location of hydrants/wells and flow rate. No further action required.
Managing waste stack sizes and separation distances. Looking to have stack size of up to 12m. The stock piles within the plan all state 4m high. As long as the maximum length and wide of the pile	FPMP updated to include 4m pile heights. Maximum lengths and separation distances in line with guidance. No further action required.

do not exceed the distances stated within the plan, then the separation distance of 13m will be appropriate too. As long as vehicle access can be achieved around the stack piles then a width of 20m is suitable, if this cannot be achieved then the width of the stack should not exceed 10m Suitable monitoring is in place with a first in first out policy, the storage time of 12 weeks is also acceptable in line with current FPMP guidance. •Fire fighting Can the operator please include the type of machinery that is available for assisting FRS please? Fire Detection and Managing Water Run-off. No thermal probes on site, will this be an issue. Regular visual inspections will be completed by the Yard Supervisor to check waste stock management and to quickly identify any issues. CCTV system will be installed to monitor the site remotely This use of probes within the metal stack will probably be hard to achieve due to the properties of the metal. The FPMP states the above measures that will be in place, these appear appropriate for the type of waste stored externally at the site.	Operator confirmed what machinery available and no further comments from FRS. No further action required. No action required.
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