

9th December 2020

Ref: CRM.0127.001.PE.L 002

Matthew Fryer
Permitting Officer
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Dear Matthew,

Re: Schedule 5 No.1&2 dated 10/11/20
Permit Reference Number: PAN-010159
Facility: Pengarnddu Industrial Estate Transfer Station
Operator: Hampshire Demolition Limited

We have reviewed both Schedule 5 Requests for Information dated 10th November 2020 and provided responses below to each question. Where referenced, supporting information has also been supplied in the attached documents.

We would like to take this opportunity to reiterate that purpose of this Facility is to clear the site at Unit 2 Pengarnddu Industrial Estate of the waste which was abandoned by its previous occupants in 2014. It will operate for a limited period until the abandoned waste is removed. It will then be taken back under the control of Merthyr Tydfil County Borough Council.

The site is currently at risk of causing pollution as the site is not under the control of a competent person or regulator. Hampshire Demolition, by applying for a Permit to enable clearing of the site, will be helping to reduce this pollution risk.

Currently the space available on site is limited due to the abandoned piles of waste. The drawings associated with this application are subject to change as waste is cleared from the site and more space is created, allowing for larger operational areas and greater separation between waste piles and the plant and equipment to be used on site. No changes to operations at the site will be undertaken with consent of the regulator.

We trust that you are now able to proceed with the permit determination process, however please contact me on 01454 269237 or via robert.chamberlain@enzygo.com should you have any queries.

Yours sincerely,

Robert Jake Chamberlain
Senior Consultant, Enzygo Ltd

Table 1: Responses to Schedule 5 Requests for Information

Ref	Question	Response
Dust Management Plan (DMP)		
<i>Re-issued Schedule 5 No.1</i>		
1	Update the language throughout the Dust Management Plan (DMP) to ensure that it is SMART (Specific, Measurable, Achievable, Realistic and Time-based).	Language has been updated throughout the report.
4	Provide further detail regarding the windbreaks that will be used around both stockpiles, and operations that are causing dust emissions.	Windbreaks, in the form of 2m high, knitted windbreak netting, will be permanently attached to the fencing to protect local sensitive receptors which lie downwind of the prevailing wind direction at the site, to prevent suspended dust from leaving the site.
5	What measures are in place to identify and control emissions as a result of the re-suspension of settled dust from surfaces, structures and, plant and equipment across the site.	Daily monitoring, cleaning of surfaces either by dust removal or using the water supply present at the site.
<i>Schedule 5 No.2</i>		
1	Update paragraph 4.4.6 to include an immediate action to cease activities whilst the operator discusses the dust emissions and potential additional mitigation with head office.	Section 4.4.6 has been updated to read: Should more than 5 dust complaints be received within an hour, activities shall be ceased. Head office shall be informed and a review of the mitigation measures within this document and site operations will be undertaken to determine the cause of the emissions of dust and review the mitigation measures currently in place to determine their effectiveness, and whether any changes are needed to operational procedures and this DMP.
2	Update Section 4.1.3 of the updated DEMP to clarify which activities 'could create emissions of dust that have the potential to leave the permitted site boundary'.	Section 4.1.3 has been updated to read: Monitoring of weather conditions, including wind direction and speed. This monitoring will occur at the beginning of each day using online weather services, such as the Met Office App, and prior to carrying out activities which could create emissions of dust (i.e. moving of stockpiles of waste, screening, crushing, tromelling and shredding of waste as well as loading waste onto vehicles for transportation off-site) that have the potential to leave the permitted site boundary and impact on local sensitive human receptors as well as by visual monitoring of the flag present on site;

Ref	Question	Response
3	Update Appendix C of the DEMP to clarify what is meant by 'where dust migration off site towards sensitive receptors is deemed likely to occur'	Appendix C has been updated with the conditions which would mean that dust mitigation off site would be deemed likely to occur.
Noise Management Plan		
<i>Re-issued Schedule 5 No.1</i>		
13	c. Update Section 2 Source of Noise and Vibration and Control Measures and Table 2.3.1 of Source Assessment and Mitigation of the NVMP to address the following points: c. Explain how you will ensure that a noise issue does not develop in regards to the 'nearest receptors' once you being to remove the existing stockpiles on site.	An updated version of the Noise and Vibration Management Plan CRM 0127 001 PE R 012 NVMP V4 Final has been submitted as part of this Schedule 5 Response. The references to stockpiles being used as mitigation have been removed.
Fire Prevention and Management Plan		
<i>Re-issued Schedule 5 No.1</i>		
15	The FPMP (Section 4.1; table 4.1.1) needs to be updated to consider the following common causes of fire as outlined in our guidance (Section 6) which are not currently considered: f. Batteries within waste deposits	Table 4.1.1 of the FPMP has been updated to include control measures to minimise the risk of batteries in waste deposits introducing an ignition source on site.
16	The FPMP (Section 3.2.2 and/or Table 3.3.1) need to be updated to provide additional information specifically in regard to the maximum storage duration of the materials. b. Provide a written description of how the maximum storage durations provided in Section 3.2.2 and Table 3.3.1 of the FPMP will be managed on site and how you will ensure that waste is not stored on-site longer than these times.	Section 3.2.2 of the FPMP has been updated with procedures to manage storage times for all material storage areas.
18	Explain how waste timber is stored in the areas on the FPMP Site Layout Plan labelled as 'processed timber storage areas'.	See Section 3.2 and Table 3.2.2 of the FPMP and the updated FPMP Layout Plan.
19	Provide details of the separation distances around the two areas labelled as 'processed timber storage area' on the FPMP Site Layout Plan. Ensure these separation distances meet our guidance.	All separation distances are now clearly marked on the FPMP Layout and accord with NRW's FPMP guidance. A 6m separation distance is shown around the waste quarantine area which will be maintained at all times.
20	Update the FPMP to outline how you will ensure that all skips will be appropriately distanced to enable them all to be accessible. It might be helpful to demonstrate the distance between the skips on	The 1m separation distance between the metal containers on the NW of the site has been increased to 2m. Separation distances are shown on the FPMP layout.

Ref	Question	Response
	a plan. You will also be required to outline how you will ensure that these distanced maintained when skips are replaced.	White lines will be painted on the ground to indicate exactly where containers are to be placed, so when full containers are exchanged for empties site operatives can clearly see where these are to be placed. Site operatives will be trained in these procedures, as set out in Section 3.2 of the FPMP.
22	b. Infra-red Monitoring. Table 4.1.1 states 'An infra-red handheld probe will be held on site to monitor the temperature of waste stockpiles before and during their relocation to the processing areas.' Given the size of the stockpiles is this infra-red probe able to identify temperatures deep in the stockpiles?	Infra-red handheld probes proposed to be used on site can determine sub-surface temperatures down to approx. 2m. Existing stockpiles will be moved in a phased manner, with one operative on the excavator and another taking regular reading of temperatures. Monitoring procedures, thresholds for action, and actions required in the event of an exceedance have been added to Table 4.1.1 and 4.1.2 of the FPMP.
23	Update the FPMP to confirm that the sites plant used to move skips and/or unburnt material (as per table 4.3.1) are suitable and meet our guidance for use in the event of a fire.	When full, and in the event of an incident, metals skips will be moved by the 360-degree material handler on site. This has metal tracks, a fully enclosed cab, and external components are resistant to radiative heat and flaming.
24	Update the FPMP to provide details on preventative measure you will put in place to limit the chances of a fire starting in existing stockpiles 1-12.	Table 4.1.1 (Measure for the Prevention of Fire) and Table 4.1.2 (Measures for the Detection of Fire) detail the site wide measures put in place to minimise the likelihood of a fire starting at the site. Where measures and/or procedures set out in these tables relate to a specific area of the site these are noted.
25	a. Update the FPMP to demonstrate that the site will have enough water supplies for firefighting a worst case (largest pile).	The largest pile of processed material at the site is 13m x 8m x 3m, equating to a maximum volume of 312m ³ . In accordance with NRW's guidance, 374,400 litres of water (1,200 litres per m ³) would be required to extinguish a fire in this pile. We have contacted Welsh Water to confirm the available water supply from the hydrants in the vicinity of the site (shown on the hydrant plan in Appendix B of the FPMP). Welsh Water have confirmed that sufficient volumes and flows of water would be available in the event on incident to provide worst case requirements. Correspondence is included with our December 9 th submission.
<i>Schedule 5 No.2</i>		
4	Update the FPMP to outline timescales for bringing the current FPMP in-line with (or as close as possible to) the FPMP guidance	The FPMP has been brought into line with the FPMP guidance.

Ref	Question	Response
	specifically in regard to the separation distances around the processed wood stockpiles and the quarantine area.	As material is cleared from the site, and more space for storage and processing becomes available to the operator, separation distances will generally be able to be increased. Any changes to the layout which may potentially introduce additional environmental risk, i.e. the introduction of additional or enlarged material storage areas, then this will be discussed with NRW's Permitting team and the local regulatory officer in advance of any changes and the appropriate authorisations sought.
Hazardous Waste		
<i>Schedule 5 No.1</i>		
33	Outline how hazardous waste is being stored and/or treated on the impermeable concreted area and the stockpiles outlined on the FPMP Layout Plan (CRM.0127.001.PE.D.004) provided with the application.	<p>In the unlikely event that potentially hazardous waste is found in piles 1-12 it will be tested, before being transferred to the quarantine area and stored within a metal skip. Any material identified a hazardous will be removed from the site within 24 hours.</p> <p>If hazardous waste is found during the processing of piles 1-12 the shut off valve for the site's surface water drainage system will be activated until the hazardous waste is moved to a metal storage bin in the quarantine area. Any collected runoff on the site surfacing will be tested before being tankered off site.</p> <p>All other piles will be removed from site before Pile 13 begins to be imported onto the site. Testing will be carried out on the waste in pile 13 before it's imported onto the site. Wastes which could be potentially hazardous are loaded into metal skips before being brought onto the site. The skips are covered and stored in the quarantine area prior to removal off site.</p>



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BRISTOL OFFICE

The Byre
Woodend Lane
Cromhall
Gloucestershire GL12 8AA
Tel: 01454 269 237

SHEFFIELD OFFICE

Samuel House
5 Fox Valley Way
Stocksbridge
Sheffield S36 2AA
Tel: 0114 321 5151

MANCHESTER OFFICE

Ducie House
Ducie Street
Manchester
M1 2JW
Tel: 0161 413 6444

Please visit our website for more information.

enzygo.com