

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Biffa Waste Services Limited,
Coronation Road,
Cressex,
High Wycombe,
Bucks,
HP12 3TZ

Application number: PAN-010745

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 18/06/2020. The information requested should be sent to the following address by **08/02/2021**.

Information should be sent to:

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

Name	Date
Kirsty Thomas	8th January 2021

Authorised on behalf of Natural Resources Wales

Ebost/Email Kirsty.Thomas@cyfoethnaturiolcymru.gov.uk
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Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP

Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

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

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

Schedule

1.Fire Prevention and Mitigation Plan (FPMP)

Please provide an updated FPMP in line with NRW guidance '*Fire Prevention & Mitigation Plan Guidance – Waste Management Guidance Note 16*' (please highlight/use different colour text in the revised plan to easily identify changes made). The submitted FPMP is missing or lacking the following information:

- Site plan needs to be updated easily identify the location of the hazardous waste storage area and non-hazardous waste storage areas. Please add the EWC codes onto the site plan.
- Separation distances between buildings. Open fronted buildings facing each other.
- Under enclosing stacks using bays and walls - a 'freeboard' space of 1m at the top and sides of the walls will be physically retained at all times in accordance with the latest available guidance. The FPMP provided states "Bay walls will be 3m in height, allowing for a minimum freeboard level of at least 0.6m." It is considered that given that waste is stored in containers on pallets, in appropriately engineered bays, that the freeboard space can be reduced from the 1m specified within the latest available guidance?
- The FPMP needs to recognise the pollution impact of smoke and fire water and its impact on the environment and people. Please provide more details on all combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on people, critical infrastructure and the environment) and how they will be minimised. Also consider the scale and nature of the environmental hazards.
- Provide information on access points around the site perimeter to assist firefighting – see table in FPMP guidance for typical Fire and Rescue Service vehicle access requirements.
- Please identify location of drum crusher and shredder (and other plant equipment), are these within the process building? All equipment, materials and wastes etc need to be identified on the site plan.
- Please provide an emergency plan for the Lamby Way site. This emergency information pack should be located "off- site". Please review and revise information.

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- It is noted that the quarantine area is in the same location as the storage area for firewater. Please can you clarify this setup and how this is possible.
- Provide details on how you reduce the amount of firewater run-off generated - use sprays and fogs rather than jets etc.
- Provide details on if separating burning material from the fire to quench it with hoses or in pools or tanks of water (this will reduce the amount of firewater produced) takes place on site.
- For the type of materials you store on site, provide further details on the form they're stored in and the length of time needed to extinguish a fire involving them.
- Are the regular maintenance checks of electrical equipment/cables etc detailed in a written procedure's documents?
- How do you prevent metal that finds its way into moving machinery and causing localised 'hot spots'.
- Confirm that as part of your reception procedures, that every effort is made to remove any form of battery unit from within the waste prior to processing. Update Standard Operating Procedures document as necessary.
- How do you monitor that wastes are not stored for longer than the appropriate time (6 months and 3 months)? Provide more details on full and frequent stock rotation and how this will be monitored and recorded.
- Are there any water suppression systems within the buildings?
- Have you considered installation of any additional measures such as CCTV visual flame detection systems, spark, infrared and ultraviolet detection etc?
- Consider the use of portable water carriers/bowsers can prove to be an essential mechanism to help extinguish fire effected waste. Any alternative water supplies.
- Confirm the quarantine area can hold at least 50% of the volume of the largest stack.
- Identify the areas of the FPMP that would need updating because of said circumstances that require you to amend/review your FPMP.

- Confirmation is required from Dŵr Cymru as to the flowrates and pressure provided by identified hydrant. Confirmation also required that hydrant is suitable and sufficient. i.e. accessible and maintained.
- Confirmation required for firefighting strategy out of operational hours. There is mention that there are contact details in the Incident response plan. Will machine operatives be available out of operational hours?

2. Noise Impact Assessment

Please provide the additional information:

- It is not clear how the potential impact of noise pollution on the internationally important populations of overwintering birds which are a designated feature of the Severn Estuary SSSI and SPA, which is situated less than a kilometre from the site at some points have been considered.
- A revised noise impact assessment must be provided that includes all the necessary information to comply with BS4142. In addition, for a site of this complexity simple noise attenuation calculations may not be sufficient and detailed noise modelling should be undertaken. The report refers to the wrong operator, the report refers to Vastint Cardiff BV when the application is from Biffa Waste Services. This also needs to be amended.
- Confirm the times in which the site will be operational, paragraph 1.13 of the submitted Noise Impact Assessment report states; "It is understood that operation hours will typically be 07:00 – 16:30 Monday to Friday, however it is assumed that the Site could operate 24 hours a day, 7 days a week." All potential operating hours should be reflected in the assessment. Following recent discussions and in the revised supporting statement it has been established that the operating hours will be limited to daytime. This needs to be updated in the Noise Impact Assessment.
- The Noise Impact Assessment report refers to the World Health Organisation (WHO) 1999: Guidelines for Community Noise. These guidelines are not relevant for carrying out industrial noise assessments. The latest Welsh Government Noise Action Plan should be considered. Please amend and update.

- A noise monitoring survey was carried out between the 16th and 17th February 2017 to determine the background sound level. As the survey was carried out over 3 years ago, it may not be representative of the current sound levels in the area. In addition, the survey was undertaken at the Northern boundary of the site. The background sound levels should be measured at an appropriate location(s) at or near to the closest noise sensitive receptor(s) and be representative of when the site will be operational. Also, if operational over weekends as well as weekdays, surveys should be carried out over representative times. Please address and update in revised Noise Impact Assessment.
- Table 3.2 of the Noise Impact Assessment outlines background sound levels, 16-hour and 8-hour average values have been used to assess impact in the submitted report, for this assessment the 1-hour and 15-minute average values should be used for assessing daytime and night-time impacts respectively, in-line with the requirements of BS4142. Please review and amend in revised Noise Impact Assessment to be submitted.
- No meteorological conditions have been detailed in the Noise Impact Assessment as required by BS4142 (wind speed, wind direction, temperature etc). Please provide additional information/update amended Noise Impact Assessment.
- All sources of potentially noise generating plant/equipment/vehicles have not been identified. The Noise Impact Assessment report only identifies 3 operations; HGV loading/unloading including forklift truck movements, skip delivery/removal and reciprocal saw use. However, paragraph 4.1 states; "It is anticipated that there may be fixed plant and equipment associated with the Proposed Development that have the potential to generate noise. At this stage of the development, details of the proposed type, number and precise location of any such plant or the nature of its operation are not available. In the absence of detailed information, it is appropriate to specify suitable noise control limits to which any plant should conform. These limits should include any appropriate corrections for acoustic characteristics." This is not an acceptable approach, as all plant/equipment whether inside a building or not should be clearly identified and assessed for impact, this includes all vehicle movements on site, the exact location of the items of plant on site should also be presented in the assessment (including drum crusher and shredder). Also consider reverse alarms on vehicles. Please update and amend Noise Impact Assessment. In the event that future changes to operations require different or additional equipment, a new noise assessment should be submitted in support of any required permit variation.

- The report states that a survey was carried out on the existing site to obtain sound levels of the 3 operations assessed, however, in Table 4.2 of the Noise Impact Assessment only the measurement of the HGV loading/unloading including forklift truck movements have been used, the skip delivery/removal has been taken from library values and the reciprocating saw has been obtained from BS5228:A1:2014. Confirm why these values have been used and not the actual measured values.
- There is a drum crusher in one of the storage bays – this is used for 20 to 30 minutes per week at most. It is not acceptable to rule out the drum crusher as not needed to be considered further, all noise sources should be considered. Please review and update Noise Impact Assessment. In addition, this statement contradicts paragraph 4.2 of the submitted report.
- Paragraph 4.13 of the Noise Impact Assessment states; “From the current site plan, loading bays are shown to the south east of the northern bays, and it is assumed that reciprocal saw use would be limited to areas immediately in front of bays. It is therefore assumed that the bays will be of a suitable acoustic integrity so as to provide effective acoustic screening to the nearest noise sensitive receptors from loading and cutting activities.”. No detail has been provided as to the exact location, height, construction materials or acoustic properties of the bays/buildings. A 10dB acoustic correction for the screening of activities in the assessment has been used, more detailed information is required to justify this correction. Please provide details. An assumption that use of the reciprocal saw will be limited to areas potentially screened by the loading bays is insufficient on its own to justify exclusion of this source from scenarios where impacts at receptors are not subject to screening correction. Please review and amend Noise Impact Assessment.
- There is a higher annual throughput at this new proposed site at Lamby Way compared to that at the current site at Currant Embankment. From recent discussions, operations will also be limited to daytime operations. Does this mean longer duration of activities taking place on site to account for larger throughput? Please provide more details.
- Confirm what is meant by façade level in table 3.2 of the Noise Impact Assessment Report and show on map.
- There are contradicting statements within the Noise Impact Assessment report such as discrepancies between amount of truck deliveries i.e. one or two a week or two an hour? What’s been used in noise calculations? Also, inconsistencies between adding penalty for intermittency, the Supporting Statement document says no impulsivity applied which contradicts the NIA/ Noise calculations. Also need explanation for not having intermittency penalty.

3. Best Available Techniques (BAT) Assessment

The proposed installation is a listed activity that falls under Best Available Techniques (BAT) Reference Document for Waste Treatment (2018) - Industrial Emissions Directive 2010/75/EU Integrated Pollution Prevention and control. Please provide an updated BAT assessment demonstrating that all applicable BAT conclusions are met. The following points in particular are missing or lacking information:

- BAT 1 Environmental Management System (EMS) – Although ISO 14001 accredited, this alone will not meet all requirements of BAT 1 such as following cleaner technologies, whole life plan consideration, regular sectoral benchmarking etc. Please review and provide additional information.
- BAT 2d - Set up and implement an output quality management system and 2g – sort solid incoming waste. Provide more details.
- BAT 4 – optimise storage location. Confirm how this is achieved and explain how wastes are loaded and unloaded on site.
- BAT 9 - Monitoring diffuse emissions of organic compounds to air from processes involving solvents. Confirm if this BAT is applicable or not and if so, provide details.
- BAT 11 – Annual monitoring of generation of residues and wastewater. Provide details on how this BAT is met.
- BAT 18 - Techniques to prevent, or where not practicable reduce noise and vibration emissions. Provide more details, see techniques listed under BAT 18.
- BAT 19 – Provide clarity on which aspects of BAT 19 of the Waste Treatment BREF BAT conclusions are applicable at the site and provide details. For BAT 19c, you should also provide information on how the site complies with CIRIA 736 or an equivalent engineering standard to which the surface complies together with sign off from construction by a Certified Quality Auditor).
- BAT 24/BAT 1 – Confirm and provide details of any residue management plan that is in place.
- BAT 26 and 27 – Relating to mechanical treatment in shredders of metal waste. Not clear if these are applicable or not. Please review and provide detailed information.

- BAT 31 – Mechanical treatment of waste with calorific value. Confirm if applicable or not and provide any additional details.
- BAT 40 to 47 and BAT 51 – Please confirm if any of these BAT conclusions are applicable or not and provide detailed information if required.

4. Other

- Please confirm that only runoff to the public water sewer is of clean uncontaminated water and that leachate runoff from storage areas and in a sealed drainage system where effluent will be tankered away to an appropriate facility for disposal.
- When un-usable drums are crushed following emptying and cleaning, are these cleaned, crushed drums re-classified before being disposed?
- Is there a drum crushing and container shredding standard operating procedures document? If so, please provide document.
- The site will receive flammable liquid waste and it is important that during bulking and transfer that run-off to drains are prevented (Isolated from drainage system) as this could lead to the accumulation of harmful and/or flammable vapours. It is expected that liquid storage containers to be securely locked when not in use to prevent accidental or deliberate release. Please clarify how the above requirements are met. Can you also confirm that each drainage channel within each bay is isolated from one another and no possibility of mixing.
- Confirm how runoff/leachate to storage tanks in bay areas are emptied/collected.
- Drainage from the engineered surfaces provided within the waste storage buildings will be to underground isolation tanks via sealed drainage pipes. Confirm how leaks from these underground tanks and pipes are detected and resolved.
- Are any dust suppression measures to be in place on site?
- Does the site need to take into consideration other HSE guidance such as HSG176 - Storage of flammable liquids in tanks (don't think this is applicable but please confirm) and HSG140 - Safe use and handling of flammable liquids?