

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: GLJ Recycling Limited
Lower Chapel Yard,
Cwmcarn,
Cross Keys,
Newport,
Gwent.
NP11 7NL

Application number: PAN-008083

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, duly made on 14 April 2020. The information requested should be sent to the following address by **1st June 2021**.

Information should be sent to:

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

Name	Date
Heather Kerr	23 rd March 2021

Authorised on behalf of Natural Resources Wales

Schedule

Noise Impact Assessment

1. The Noise Impact Assessment (Ref: 5217/NIA1_Rev2 – 12th July 2019) includes a 3dB acoustic penalty for impulsivity. Based on the type of equipment being assessed, further acoustic penalties could be applied. Provide evidence to confirm whether there are or aren't other acoustic characteristics associated with the plant operation that could result in further acoustic penalties.

Fire Prevention and Mitigation Plan

2. The Fire Prevention and Mitigation Plan (11- Fire Management Plan, 22 August 2019) appears to be written in accordance with Environment Agency Fire Prevention Plan (FPP) Guidance, November 2016 as referenced in Section 3.3.4.3 of the document.

Please provide a plan written in accordance with Natural Resources Wales Fire Prevention & Mitigation Plan Guidance – Waste Management, Guidance Note 16, August 2017.

Please provide an updated plan incorporating all information requested in the questions below.

Fire Prevention and Mitigation Plan Contents

- 2.1. **Amount and type of waste received daily:** Table 5 includes the amount and type of waste received daily however all combustible waste on site has not been included. Please update the table to include all storage of combustible waste permitted under any of the permits held on site.
- 2.2. **Maximum storage time for each waste type:** Section 2.3.4 states that “wastes are stored on site for as short as practicable, normally less than 3 months”. Please confirm the maximum storage time broken down for each waste type on site.
- 2.3. **Waste pile sizes:** Waste quantities stored on site are given in tonnes in Table 5. Please provide the maximum size of each waste pile (in m³), stipulating the maximum length, width and depth.
- 2.4. Confirm that a clear area is established around the perimeter of the site and illustrate this on a site plan. Figure 5 currently shows the quarantine area and waste transfer station up against the site boundary.
- 2.5. **Contact details of sensitive receptors:** Please include the contact details of any sensitive receptors within 1km of the site that you would contact in the event of a fire and include details on the procedure used to contact them.

Site Plans

- 2.6. Figure 3 (Site Layout and Material Storage Location) does not include the location of any areas where hazardous materials are stored on site (e.g. gas cylinders, oil tanks, fuel tanks). Please update Figure 5 to include these.
- 2.7. Figure 2 and 3 do not show the location of any firewater containment systems (e.g. is the site fully kerbed to prevent release of water outside the boundary?). Section 3.10 of the plan states that *“firewater runoff would be retained on the concrete surface of the site by the engineered gradient of the surface”*. Please update Figure 2 or 3 to show where and how water would be retained on site.
- 2.8. Please update Figure 4 to include the location of the off-site emergency information pack.
- 2.9. A plan is required that shows the location of key receptors such as critical infrastructure, schools, hospitals, residential areas, workplaces, protected habitats and rivers within 1km of the site. Please update Figure 8 to include all key receptors within 1km of the site.

Common Causes of Fires and Preventative Measures

- 2.10. **Plant or equipment failure:** Please confirm where mobile plant is stored when not being used.
- 2.11. **Industrial heaters:** Please confirm whether industrial heaters are used on site and include procedures that set out the use and regular maintenance.
- 2.12. **Hot loads:** Confirm how the quarantine area will be used to handle hot loads.
- 2.13. **Build up of loose combustible waste, dust and fluff:** Confirm how regularly you inspect and clean the site to prevent the build-up of loose combustible waste, dust and fluff within buildings and around the site.
- 2.14. **Batteries within waste deposits:** Confirm how batteries are looked for and removed from all incoming waste before processing.
- 2.15. **Batteries in ELVs:** Confirm how quickly batteries are removed following acceptance of vehicles on site.
- 2.16. **Cylinders stored at site:** Confirm how and where cylinders are stored on site and include storage location on a site plan (refer to question 2.6).
- 2.17. **Leaks and spillages of oils and fuels:** Confirm how fuels and combustible liquids are prevented from trailing from site vehicles and ELVs. Confirm how any materials used to absorb combustible liquids are correctly disposed of.

Storage Times and Self-Combustion Factors

- 2.18. Table 9 includes control levels for fluff pile properties. Confirm how moisture levels are checked and how often.
- 2.19. Section 3.4.2.2 provides details on the stock rotation procedure for fragmentiser fluff. Please demonstrate how good stock rotation for all stored materials is undertaken and how this is monitored daily.
- 2.20. Please confirm whether all material is stored in its largest form prior to processing.

Managing Waste Material Stacks and Separation Distances

- 2.21. Provide evidence to show how stack lengths and separation distances have been determined in line with Graph 1, Section 8 of the Fire Prevention & Mitigation Plan Guidance – Waste Management, Guidance Note 16, August 2017.

Storage of ELVs

- 2.22. Confirm whether each ELV is accessible from at least one side to allow a fire to be fought and so unburnt vehicles can be accessed and moved to prevent the fire spreading.
- 2.23. Confirm that ELVs have a maintained separation distance between rows of vehicles in line with Table 2 of the Guidance.
- 2.24. As referenced in Question 2.3 above, please confirm the maximum length, width and depth of all stacks. Table 10 states that tyres and frag fluff will be stored to a maximum height of 5m however Section 3.4.2.2 states that frag fluff will be stored to a maximum of 4m.

Baled Waste Storage

- 2.25. Confirm whether waste is stored in bales on site. Table 5 includes baled drinks cans however there is no further information regarding bale storage in the document. If bales are stored on site, please confirm how the risk of a fire occurring within the bales has been reduced in line with Section 10 of the Guidance.

Enclosing Stacks Using Bays and Walls

- 2.26. Please provide evidence of the bay wall construction on site. Evidence should be provided that shows:
- The walls provide 120 minutes fire resistance;
 - The product specification has been established via an approved stockist; and
 - The installation method of the walls is in line with the manufacturers recommended installation requirements.

2.27. Confirm that a freeboard space of 1m will be maintained at the top and sides of the bay walls and how this will be physically retained.

2.28. Confirm how the quarantine area will be used and how materials will be moved during an incident.

Waste Stored Within a Building

2.29. Figure 3 and Table 5 state that non-ferrous metal, batteries, tyres and ELVs are stored within a building. The site plans do not show the internal layout of the buildings. Please provide a site plan that illustrates how the general principles included within Section 12 of the Guidance have been incorporated for all wastes stored within a building.

2.30. Confirm how electrical equipment and heaters (if used) are kept free from waste, including dust and packaging materials.

2.31. Confirm whether waste storage buildings have some means of clearing smoke from the building such as openable skylights or roller shutter doors.

Waste Stored in Containers

2.32. Table 5 states that tyres may be stored within a container and Table 6 states that batteries will be stored in appropriate containers. Confirm whether these containers hold more than 1,100 litres of waste.

2.33. For any containers that hold over 1,100 litres of waste, explain how these are accessible so a fire can be extinguished and how they would be moved in a safe manner to prevent a fire from spreading.

Seasonality and Waste Stack Management

2.34. Section 3.9 states that during times of low commodity values, stockpiling of ferrous and non-ferrous metals could occur. Confirm how this will be managed ensuring the principle of “first in, first out” is followed.

Monitoring and Turning of Stacks

2.35. Provide details of the training staff receive to detect and manage hotspots.

Firefighting Strategy

2.36. Confirm which items of suitable heavy mobile plant are available on site that can be used to move waste around the site.

2.37. A water bowser is included in Section 3.4.2.2 but there are no details on where this is kept, how it would be filled or when it would be used. Confirm whether the water bowser would be used to help extinguish fire effected waste.

2.38. Section 3.13 (response during an event) includes the procedure for responding to an explosion in the shredder. The Guidance describes a variety of firefighting techniques that can be used together or separately to extinguish a fire:

- Applying water to cool unburnt material and other hazards;
- Separating unburned material from the fire using appropriate heavy plant;
- Separating burning material from the fire to quench it with hoses or in pools or tanks of water;
- Suffocating the fire using soil, sand, crushed brick or gravel – this can only be used if:
- Natural Resources Wales has agreed you can do this; and
- You remove and dispose of contaminated material as soon as it is safe to do so.

Provide details of the firefighting techniques that could be used on site to extinguish a fire in all waste types.

Water Supplies

2.39. Section 3.11 states that a hydrant is available nearby as shown in Figures 6a and 6b and the River Ebbw runs alongside the site as shown in Figure 7. You must have sufficient water supplies available to manage a worst-case scenario incident (e.g. one (your largest stack) or more stacks on site are on fire. Provide details of the largest stack on site (in m³) and provide evidence that shows you have access to the required quantity of firewater to extinguish a fire within it. Section 20 of the Guidance states that the following can be used as a rough guide to calculate the volume of water you will need: *“A 300m³ stack of combustible material will normally require an average water supply of at least 2,000 litres a minute for a minimum of 3 hours”*.

Managing Fire Water Run-off

2.40. Provide evidence to show that the firewater containment measures detailed in Section 3.6 and 3.10 are sufficient to contain the volume of firewater required to manage a worst-case scenario incident (e.g. one (your largest stack) or more stacks on site are on fire.

2.41. Section 3.10 states that *“if above ground storage capacity is exceeded (including tankering), the remainder of the firewater runoff would be retained on the concrete surface of the site by the engineered gradient of the surface”*. It is not clear where the firewater would be retained or how this would be possible (e.g. is the site kerbed to prevent release of water outside the boundary?). Provide further details of this secondary containment measure in conjunction with the updated site plans as requested in Question 2.7 above.

Designated Quarantine Area

2.42. Section 3.3.10 states that there are two quarantine areas of 150m² and these are illustrated on Figure 3. Confirm the volume of waste each area can hold.

2.43. Confirm that the quarantine area(s) can hold at least 50% of the volume of the largest stack on site.

2.44. Section 3.3.10 confirms that the quarantine area in the northern part of the site is at least 10m from any buildings or the site boundary. Confirm that the quarantine area in the southern part of the site has a separation distance of at least 6m around the quarantined waste.

During and After an Incident

2.45. Provide details of how incoming wastes will be diverted to alternative sites during a fire.

2.46. Provide details of the steps you must take before the site can become operational again.

Reviewing and Monitoring your Fire Prevention & Mitigation Plan

2.47. In a separate section within the Fire Prevention & Mitigation Plan, describe the methods and procedures used to maintain compliance with the plan.

2.48. Section 1.1 states that the plan will be reviewed more frequently than every 4 years following significant plant modification or an incident. Provide evidence to show that all circumstances warranting a review of the plan included within Section 24 of the Guidance have been considered.

2.49. Describe the areas of the plan that would need updating because of the circumstances referred to in Question 2.48 above.