Notice of request for more information

Environmental Permitting (England and Wales) Regulations 2010

Notice requiring further information

To: Michelle Goddard
Fern Close
Pen Y Fan Industrial Estate
Crumlin
NP11 3EH

Application number: PAN 000061

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 16th October 2015. The information requested should be sent to the following address by 6th April 2016.

Information should be sent to:

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

Name	Date
	10th March 2016

Eirian Macdonald

Authorised on behalf of Natural Resources Wales

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Risk Assessment

1. Section 1.1.4 of the risk assessment states that "no handling operations will take place on Sundays or public holidays", yet the site will be operational 24 hours a day 7 days a week. **Please clarify what is meant by "no handling operations will take place".**

2. Section 2.4.5 states that the Regenerative Thermal Oxidiser (RTO) will reduce up to 100% of odour emissions. **Please clarify the typical percentage reduction of odour emissions expected from this RTO under normal operating conditions.**

3. **Please clarify how odour will be controlled from this installation when the RTO is not in operation.**

4. Section 2.7.6 states that any liquor generated within the waste reception building will be directed to foul sewer. **Please clarify what wastes are expected to generate liquor and please justify the suitability of these waste types for turning into a fuel.**

5. 2.12.5 Provides details of the calorific value of both types of fuel produced. **Please provide details of how these figures were derived.**

6. Table 1 of the risk assessment states that highly odorous waste will be stored for less than 24 hours. **Please clarify what actions and control measures will be in place if highly odorous waste is found to be received and what actions and control measures will be used to ensure that it is removed within 24 hours.**

7. Table 1 – Odour from failure of the plant. **Please clarify what procedures will be in place in the event of plant failure.**

8. Appendix B, Caerphilly weather station information. The average air temperature looks high. **Please verify the representativeness of the Caerphilly weather station information.**

Operating Techniques

9. The Operating Techniques document has been compiled with reference to Sector Guidance Note SGN 5.06: "Guidance on the Recovery and Disposal of Hazardous and Non Hazardous Waste", 2004. This version has been superseded by a revised version taking into account the Industrial Emissions Directive (2010/75/EU) published 2013. As a result, several sections throughout the document refer to incorrectly numbered sections. **Please provide a revised version of the Operational Techniques and Monitoring Plan document in accordance with the correct version of SGN 5.06.**

10. Table 1.3.3 states that 100,000 tonnes per annum, equates to 397 tonnes per day based on 252 operational days per year. If the site receives waste for 5.5 days per week throughout the year this equals 278 days excluding public holidays. This would mean that the treatment capacity is 360 tonnes per day. **Please explain your calculations.**

11. Section 2.1.7 which talks about pre-acceptance procedures does not request from all customers the composition of the waste, handling requirements, hazards, quantity and form of the waste prior to waste being accepted. **Please explain this omission.**

12. Section 2.2.4 states that waste may be accepted for disposal. However no disposal codes have been included in the application. **Please clarify if wastes will be accepted for disposal.**

13. The waste reception building will be fitted with roller shutter doors and kept under negative pressure. **Please confirm how this negative pressure will be maintained when the doors are open.**

14. Please clarify if drainage from the baled RDF will drain via foul sewer.

15. Please confirm the proposed technical competence qualification which it is proposed will be undertaken should a permit be granted.

16. With regards to the list of wastes provided, please provide a description of the wastes proposed under the following waste codes in the table below and please clarify the suitability as a fuel for each waste type in the table:

02 03 02	Wastes from preserving agents
02 03 03	Wastes from solvent extraction
02 03 04	Materials unsuitable for consumption or processing
02 05 01	Materials unsuitable for consumption
02 07 01	wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	wastes from spirits distillation
02 07 04	materials unsuitable for consumption or processing
09 01 07	photographic film and paper containing silver or silver compounds
09 01 10	single-use cameras without batteries
16 01 22	components not otherwise specified
17 05 04	soil and stones other than those mentioned in 17 05 03
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19 10 06	other fractions other than those mentioned in 19 10 05
19 12 09	minerals (for example sand, stones)
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20 02 03	other non-biodegradable wastes
20 03 03	street-cleaning residues
20 03 07	bulky waste

Odour Management Plan

17. Section 1.5.5 describes sensitive receptors as places where people are likely to be present for more than 6 hours at any one time. **Please clarify where this definition is derived from.**

Site Condition Report

18. Plans showing the following are missing from the Site Condition Report:

- Details of Site Surfacing
- Details of Site drainage
- Details of receptors
- Emission Points and sources
- Monitoring points.

Please provide site plans showing the above listed information so that the submitted Site Condition Report can be adequately assessed.

Fire Prevention Plan

19. For large heavy material the estimated flammable portion is 4.59. **Please explain how this figure has been derived.**

20. Section 2.2.12 states that the exact sizes of storage bays has not yet been confirmed. Storage bay sizes should be included in detailed designs of the proposed site drawn up by the architects. **Please provide details.**

21. Table 2.2.12 shows sizes for Fridges, computers and electrical equipment and fragmentiser fluff. However no waste code has been provided for these. **Please confirm if these waste types will be will be received or not and provide the relevant waste codes for consideration if applicable.**

22. Section 3.2.2 States that a fire response procedure is incorporated into the Management System. **Please provide proposed details of the fire response procedure.**

23. Section 3.4.10 states that a dedicated emergency or quarantine area will be provided. **Please confirm the size of this area and its location.**

24. Please also confirm separation distances between plant and combustible material if the site is not staffed.

25. Section 3.5.6 states that temperature monitoring methods and frequency will be agreed locally with NRW/Fire and Rescue Service. Details of these procedures need to be agreed as part of our assessment of the application. **Please provide details.**

26. In the section "actions in the event of a fire" there are no details about fire water containment. **How will this be contained if a fire occurs on site?**

27. Please confirm how much separation will be maintained between baled RDF/SRF material and the site perimeter.

28. As waste will be stored up to the maximum capacities outlined in the fire prevention plan guidance, a deep seated fire could occur**. Please provide details to demonstrate that the fire suppression system would be effective at tackling these types of fires.**

29. No details have been provided relating to turning and monitoring of piles**. You must explain what triggers you will use in relation to temperature and moisture content and the escalation of actions in relation to these triggers.**

30. The site plan submitted in support of the application does not show everything required for fire prevention plans. The site plan should show:

- layout of buildings
- any areas where hazardous materials are stored on site (location of gas cylinders, process areas, chemicals, piles of combustible materials, oil and fuel tanks)
- main access routes for fire engines and any alternative access
- access points around the site perimeter to assist fire fighting
- hydrants and water supplies
- any watercourse, borehole or well located within or near the site
- areas of natural and unmade ground
- the location of plant, protective clothing and pollution control equipment and materials
- drainage systems, foul and surface water drains, and their direction of flow and outfall points
- the location of drain covers and any pollution control features such as drain closure valves and firewater containment systems
- location of key receptors such as critical infrastructure, schools, hospitals, residential areas, workplaces, protected habitats and rivers within 1km of the site
- compass rose showing north and the prevailing wind direction