

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Company Secretary
Atlantic Recycling Limited
Atlantic Ecopark
Newton Road
Rumney
Cardiff
CF3 2EJ

cc Ahlim Hashm, RPS (via email)

Application number: EPR/PP3993VS/V006

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 to determine your application for a permit, dated 27th April 2017. The information requested should be sent to the following address by **18 January 2019**.

Information should be sent to:

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

Name	Date
Jacqui Collier	14/12/2018

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 03000 653031
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Schedule

Emissions to Air

1. The air dispersion modelling report submitted with your application provides predicted concentrations for Heavy Metals, Hydrogen Chloride, Hydrogen Fluoride, Particulates, Polycyclic Aromatic Hydrocarbons, Polychlorinated Biphenyls, Dioxins and furans etc. However, a detailed Human Health Risk Assessment has not been provided. Please provide a detailed Human Health Risk Assessment for emissions associated with the proposed Small Waste Incineration Plant.

Waste Treatment BREF

2. The waste treatment sector BAT Conclusions document was published on 17 August 2018. New waste installations and new or replacement plant at existing waste installations must use Best Available Techniques (BAT) and meet associated emission limits from the date that they are first permitted. As a new waste Installation you will need to demonstrate how you comply with the BAT conclusions. For the purposes of this you will need to compare the proposed operations against the relevant BAT conclusions, stating if you comply with the BAT Conclusions and providing the necessary justification/evidence to demonstrate how.

The BAT assessment will need to be completed for the Section 5.4 activity, see response to information provided for previous Schedule 5 Notice. If the RDF/SRF activity is not to be considered as a listed activity, then the BAT assessment will need to be carried out for the Waste Water Treatment Plant (WWTP).

Drainage

3. Please provide an updated site layout and drainage plan illustrating how the proposed WWTP fits with the existing site drainage, and all emission points from site. Drawing ref JCD0170-PER-002 provided on 27 April 2017 shows the proposed location of the WWTP but not the current drainage including the interceptors and any penstock valves. It is worth noting that Table S3.1 of the permit will also need to be updated to account for the WWTP as a source.

4. Section 3.2.2 of Operating Techniques Update provided on 22 October 2018 states that runoff from the RDF/SRF building is to be collected in a sealed system. If the storage capacity is exceeded, excess water will be discharged directly into the reens or field ditches. Can you confirm where this discharge will be, if it will be via the existing drainage system or if this is a new point source emission which should be included in the permit. This drainage and discharge should also be illustrated in the drainage plan referred to above and the updated plan supplied to NRW.

5. The water treatment plant process diagram in Operating Techniques Update provided on 22 October 2018 shows runoff from the transfer station. Section 2.4.20 also refers to surface runoff from operational areas of the transfer station. Can you clarify if the WWTP is treating water from all the activities detailed in Table S1.1 of the permit (A1-A4) or just the transfer station. Again, this should be illustrated on the drainage plan.

Waste acceptance

6. Section 2.2.1 of Operating Techniques Update provided on 22 October 2018, states that once the RDF/SRF processing facility is operational, loads categorised as a chapter 19 waste will automatically be directed to it rather than the WTS. The permit allows more 19 codes to be accepted at the WTS (Tables S2.1a and S2.1b) whilst only 19 12 12 can be accepted for RDF/SRF processing (Table S2.4). Operating in this way would therefore not be in compliance with your permit. You have applied to increase the maximum permitted quantity in table S2.4 but not to add any additional waste codes. Please advise how you wish to proceed on this matter.

Monitoring

7. Section 1.3.4 of the Non-Technical Summary states that Atlantic Recycling Limited requests the removal of the “other specifications” from Table S3.2 and Table S3.3 to be replaced by a new IMS procedure. The IMS procedure is also referred to in the surface and groundwater monitoring section of your Operating Techniques document. A copy of the procedure has not been provided. Can you please provide it.

Fire Prevention & Mitigation Plan (FPMP)

8. Table 2 in section 3.3.3.1 existing storage says that processed wood will be stored for up to six months. Our FPMP guidance says that shredded and similarly treated wastes (that is wastes whose particle size has been reduced) should be stored for a maximum of three months, as you have detailed in Table 1 of section 3.3.1.1. Can you explain why the storage time for this waste is longer than recommended by the FPMP guidance?

9. Table 3 in section 3.3.3.1 lists waste pile sizes and required separation distances but wood waste is not included. How will wood waste, before and after treatment be stored? Please ensure that all waste types are included in this table.

10. FPMP guidance states that shredded and similarly treated wastes (that is wastes whose particle size has been reduced) should be stored for a maximum of three months, and baled waste for six months. Section 3.3.4 of your FPMP says that monitoring will be carried out for processed RDF and mixed wastes should waste be stored on site for longer than three months, and for baled on RDF for longer than six months. These wastes should not be stored on site for longer than the recommended storage times, your FPMP should detail how this will be avoided. Baled waste should also be monitored regardless of storage times so procedures should be updated to reflect this, as the potential storage of baled waste although unlikely has not been completely ruled out.

11. Section 5.3 of the FPMP relating to the Biomass Boiler says the boiler has a self-contained fuel bunker with a capacity of approximately 20 tonnes and usual practice will be to keep one day's worth of fuel (approx. 7 tonnes). The Boiler Operating Techniques document says in section 3.2.4, there is sufficient capacity for two days worth of fuel. This would be approximately 14 tonnes. No detail is provided in either document about how the fuel will be stored and managed, and contradictions between the documents need to be corrected and re-submitted to NRW.

12. Seasonality should consider changes in supply and demand for waste, not weather conditions. Section 3.3.5 should be updated to reflect this.

Changes to proposed variation

13. When your application was first submitted you stated that post processing of RDF/SRF waste, loose waste would be stored within the building and baled waste outside on an impermeable surface with sealed drainage. You have since requested that loose waste also be stored outside due to a change in customer requirements for non-baled waste. Can you please advise what procedures will be in place for the management of the storage of loose waste outside. The Environmental Risk Assessment provided with your application considers baled waste stored outside. This will need to be redone to consider the storage of loose waste and re-submitted to NRW.

END OF SCHEDULE