

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Mr. Federico Perez (Company Secretary)
Celsa Manufacturing (UK) Limited
Building 58
East Moors Road
Cardiff
CF24 5NN

Application number: PAN-002062

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 (duly made) 08/11/2017.

The information requested should be sent to the following address by **29 Jan 2018**.

Information should be sent to:

louise.bailey@cyfoethnaturiolcymru.gov.uk

Name	Date
Louise Bailey	08/01/18

Authorised on behalf of Natural Resources Wales

Schedule

1. Waste codes

The description for EWC waste code 16 01 22 is “components not otherwise specified”.

ACTION:

- a. confirm what wastes you are expecting to accept under this code; and
- b. propose wording that will sit within the waste table in the format of “components not otherwise specified consisting of only”.

2. Site Specific Risk Assessment

Annex C: Environmental Risk Assessment of main application report states that the closest protected site is Earlswood Road Cutting and Ferryboat Inn Quarries SSSI, however this is incorrect as it is Cors Crymlyn/Crymlyn Bog SSSI is nearer. This was correctly identified in your Non-technical summary.

ACTION:

- a. correct this error within the risk assessment; and
- b. ensure that your risk mitigation is appropriate for the specific reasons the Cors Crymlyn/Crymlyn Bog SSSI has been designated for.

3. Site Specific Risk Assessment

Annex C: Environmental Risk Assessment of main application report states that “the site is composed of hardstanding”. In an environmental permit, hardstanding means a permeable surface, which is not at this site.

ACTION:

- a. Update the risk assessment to read “impermeable surface” rather than “hardstanding” as the risk assessment will be incorporated into the permit.

4. Fire Prevention & Mitigation Plan

We have assessed the Fire Prevention & Mitigation Plan against version 2 of the guidance which was published August 2017. The FPMP guidance sets out what *must* be in your FPMP, and what *should* be in your FPMP, this is set out below. For the *should*, please do these, give alternatives or explain why you do not think they apply. Please note that “stack” can also mean “pile”.

ACTION:

Please make the following additions or amendments to your FPMP:

- a. Section 6.1 states waste is to be stored on “Concrete hardstanding” as above, please amend this to “impermeable surface”.
- b. Section 6.1 also states “waste piles will be interlaced to break up the chimney effect”. Given that the waste being stored is shredded metal and will be in piles, this does not make sense. Please clarify this statement or remove it.
- c. Fire Prevention and Mitigation Plan contents
Your FPMP does not currently (but *must*) include the following:
 - the amount & type of waste received daily and how it is managed
 - the total amount of waste & the types and forms (e.g. unprocessed, shredded, chipped, fines or baled) that are stored on site at any one time and

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how it will be stored

- the maximum size of any waste pile, stipulating the maximum length, width and depth (*maximum length, width and depth have been given, however they do not meet the guidance- see below for further details*)
- the minimum separation/fire break distance required between all waste/baled waste stacks, and between buildings and waste/baled waste stacks (*separation distances have been given, however they do not meet the guidance- see below for further details*)
- a clear area must be established around the perimeter of site, this can vary depending on the layout of your site and permitted stack sizes in accordance with the separation distances as illustrated in **Table 2** (this must be available at all times and identified on your site plan) (*only the area where waste is to be stored is shown on the plan, the pile sizes and location, and clear areas must be shown*)
- the fire prevention techniques used, including management of hotspots (signs of potential self-combustion), monitoring, reporting, recording and actions
- contact details of sensitive receptors within 1km of your site –
 - **Human receptors** include hospitals, nursing homes, schools, residential areas, places of work, transport networks.
 - **Environmental receptors** include source protection zones, surface waters, potable abstractions, groundwater, protected habitats, fisheries
- how safe access to the site for fire and rescue services and other emergency responders is achieved

d. Site plan

You *must* include a single site plan drawn to scale showing:

- layout of buildings (including access points, fire exits & location of utilities)
- areas where hazardous materials are stored (location of gas cylinders, process areas, chemicals, piles of combustible materials, oil & fuel tanks)
- main access routes for fire engines (typical FRS vehicle access requirements are below) & any alternative access points around the site perimeter to assist fire fighting
- Location of 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 “off- site” emergency information pack with site plan

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- location of sensitive receptors within 1km of your site –
 - **Human receptors** include hospitals, nursing homes, schools, residential areas, places of work, transport networks.
 - **Environmental receptors** include source protection zones, surface waters, potable abstractions, groundwater, protected habitats, fisheries
- location of the quarantine area *(already shown)*
- assembly point for staff and visitors to site *(already shown)*
- compass rose showing north and the prevailing wind direction

e. Common causes of fires and preventative measures

The following are some risk and measures that we believe *may* be on your site given some of the waste types you are proposing to accept, but have not been mentioned in your FPMP. If there is no possibility these could be on your site, then they do not need to be included.

- **‘Tramp’ metal** that finds its way into moving machinery and causes localised ‘hot spots’. Prevent metal getting into moving machinery by pre-sorting and/or extraction by a magnet/eddy current separator, especially when ignitable or explosive materials are present;
- **Batteries within waste deposits** - as part of your reception procedures, you must ensure that every effort is made to remove any form of battery unit from within the waste prior to processing. A number of recent fires within waste processing systems have been caused by batteries entering processing machinery.
- **Batteries in ELVs** - Batteries left connected in un-depolluted vehicles can short circuit and cause fires. You must disconnect or remove batteries from un-depolluted vehicles as soon as possible after reception
- **Cylinders stored at the site** – should be stored in the correct manner when either in/or not in use. Cylinder storage locations should be identified on the site plan.
- **Leaks and spillages of oils and fuels** - You need to prevent fuels and combustible liquids leaking or trailing from site vehicles and ELVs. For example, this includes from vehicles:
 - being tracked around the site
 - before or after the de-pollution process
- You must ensure that any materials used to absorb combustible liquids are correctly disposed of to reduce the risk of a potential fire situation.

f. Managing waste material stacks and separation distances

You have given pile heights of 4.25 meters, with length or widths as 20 meters, and separation distances of 6 meters. These do not meet the guidance.

Within the FPMP:

- the maximum heights are given as 4 meters.
- Stack widths and lengths can be 20 meters, but only if;
- Separation distances (stack to stack) are 10 meters (Figure 1 in FPMP)
- Separation distances (stack to building) are 13 meters (Figure 1 in FPMP)

Please note- A maximum stack width of 20 metres can be used provided appropriate

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access for plant/machinery is available from both sides. If it is not, a maximum of 10 metres should be used (based on practical fire-fighting considerations).

As part of your waste stack management protocol you *should* consider adopting the following general fire prevention and mitigation principles:

- manage all stacks to within the maximum sizes and minimum separation distances
- have availability to adequate water supplies or alternative firefighting methods at all times to fight a fire
- enable easy access for emergency vehicles around the whole site
- manage all stacks of materials that can self-combust and demonstrate suitable additional precautions if they are stored for more than 3 months

g. Layout of waste stacks on your site

Layout of the waste stacks (piles) has not been detailed other than size or general location. Other factors that you *may* need to take into account when deciding on your site/stack layout.

- Location of potential ignition sources on your site
- Location/s of occupied buildings and high-asset value equipment and plant
- Escape and evacuation routes around your site and within buildings must not be compromised by stack layout
- Location of flammable and/or hazardous substances kept on site, such as gas cylinder cages, diesel tanks, quarantine areas which may contain non-conforming wastes etc.
- Locations of on or off-site fire hydrants, other water supplies and fire-fighting equipment. you do not want to block access to these with your stack layout
- Proximity and location/s of any infrastructure which may be affected by a fire, such as overhead power lines, major roads, rail lines etc.
- Proximity and location/s of any off-site, third party buildings which may be affected by a fire
- Permitted amounts of wastes, and types of waste, allowed on site
- Location of a 'quarantine' area, as appropriate to site specifics
- Operational practicalities such as movements of vehicles & designated routes
- Stock rotation requirements, seasonality of supply/off-take etc.
- prevailing wind,
- where fire water will flow
- firefighting strategy.

h. Seasonality and waste stack management

Little information has been given on Seasonality and waste stack management other than a 3 month storage limit and a first in first out policy. Please read this section of the guidance and address where relevant.

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i. Monitoring and turning of stacks

No information has been given on monitoring and turning of stacks. Please read this section of the guidance and address where relevant.

j. Fire detection

No information has been given on Fire detection, only what to do in the event a fire is located. Please read this section of the guidance and address where relevant.

k. Fire suppression systems

No information has been given on Fire suppression systems. Please read this section of the guidance and address where relevant.

l. Firefighting strategy

Little information has been given on Firefighting strategy. Please read this section of the guidance and address where relevant.

m. Water supplies

No information has been given on Water supplies. Please read this section of the guidance and address where relevant

n. Managing water run-off

Little information has been given on Managing water run-off. You have stated sandbags may be deployed and that fire water may be tinkered away. Please read this section of the guidance and address where relevant.

o. During and after an incident

Little information has been given on your procedures During and after an incident. Please read this section of the guidance and address where relevant

p. Reviewing and monitoring your Fire Prevention & Mitigation Plan

Little information has been given on your procedures for Reviewing and monitoring your FPMP. The only reference to reviewing is following a fire. Please read this section of the guidance and address where relevant

6. Noise and Vibration Management Plan

There may be a risk of noise and/or vibration from the proposed activities (we do not understand the extent of this risk yet as we do not know the details of the proposed activities).

ACTION:

If the proposed activities are likely to give rise to noise and/or vibration, please provide a Noise and Vibration Management Plan which identifies the sources and risks of noise and vibration from the proposed activities, and details how the applicant will mitigate and manage these. The Noise and Vibration Management Plan may be a separate document, or may form part of the Environment Management System (EMS) Summary. (There is a section on Noise (Section 5) in the Main Application Report, but we would require more detail and site-specific information than has been provided in this section.)

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Further information on noise and vibration from waste operations and Noise and Vibration Management Plans is available in our document 'How to comply with your environmental permit' (available on our website at <http://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>), in particular on pages 47 and 48.

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