



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Company Secretary
Browns Recycling Group Limited
Bynea House
Heol Y Bwlch
Bynea
Llanelli
Carmarthenshire
SA14 9SU

Application number: PAN-002678

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, duly made 14/06/18.

The information requested should be sent to louise.bailey@cyfoethnaturiolcymru.gov.uk by 19 July 2018.

Name	Date
Louise Bailey	19 June 2018

Authorised on behalf of Natural Resources Wales

Schedule

1. **BG3 and BG11 Risk Assessment**

The risk assessments you have provided do not cover all risks from your proposed activity.

Please review the guidance and ensure that all risks, hazards and receptors have been covered:

- <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>
- <http://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf> page 20

For example, the Burry Inlet and Loughor Estuary SSSI and a Carmarthen Bay and Estuaries / Bae Caerfyrddin ac Aberoedd SAC have not been mentioned in any detail.

You can use the generic risk assessments for standard rule sets for similar activities as a basis. These have been attached to help you.

ACTION: complete and submit a detailed site-specific risk assessment for your proposed activity and site.

2. **BG4 Resume of Environmental Management System**

This document does not provide the detail about your proposed activity and how you intend to operate it.

The guidance for this is <http://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>

ACTION: please provide all information from points 1 to 7 as detailed in the EMS resume ensuring it is in line with the above guidance.

3. **BG7a WAMITAB certificate.**

The original award (4MPTNH6) is the non-hazardous transfer *with treatment* award, however continuing competence is for transfer only. This continuing competence is not appropriate for the original award or the proposed activity.

ACTION: complete the correct continuing competence qualification which is TMNH.

Ffôn: 0300 065 4213

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Cambria House, 29 Newport Road, Cardiff, CF24 0TP

www.naturalresourceswales.gov.uk

Correspondence welcomed in Welsh and English

4. **Planning drainage strategy (provided 25/05/18 in response to not duly made information request)**

This document contradicts itself with regards to site drainage. This document states:

- (a) There are currently no positive drainage systems for the surface water on site; the land drainage currently permeates through the ground and discharges naturally.
- (b) Surface water cut-off ditches will be provided to collect run off from the crushing and screening and stockpile area, the surface water intercepted in these ditches with discharge via silt chambers to the existing pond.
- (c) The chambers are to be inspected monthly and any silt removed
- (d) The pond should be kept free from silt build up to ensure natural infiltration can be maintained
- (e) The proposed works will not change the current drainage regime as no additional impermeable areas are being introduced.

In section (a) it states drainage goes through the ground, but in section (b) it states drainage is collected from areas of the site, and in section (e) states “no additional impermeable areas” which infers there is already impermeable areas on the site.

ACTION: please explain/show what activities are happening where on site, and what kind of infrastructure each are has i.e. permeable hardstanding or impermeable surface with directed runoff.

In section (b) and (c) it mentions silt chambers. This infers that the drainage goes through a silt interceptor prior to discharging to the pond, and that the pond is not a settlement pond as previous claimed (as supported by section (d)).

ACTION: is there a silt interceptor or any other kind of interceptor? If yes you need to provide details of this, how it will be used and maintained, and give its location either on a map or with a grid reference.