

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2010

Notice requiring further information

To: Company Secretary
Fenestration Recycling Company Limited
Pillar House
113/115 Bath Road
Cheltenham
Gloucestershire
GL53 7LS

Application number: EPR/HP3938RN/V002 (PAN-000202)

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 **23/03/2016**.

The information requested should be sent to the following address by **04/07/2016**.

Information should be sent to:

Alys Rook at alys.rook@cyfoethnaturiolcymru.gov.uk

Name	Date
Alys Rook	03/06/2016

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 4550
Ffacs/Fax 0300 065 3001
Ebost/Email alys.rook@cyfoethnaturiolcymru.gov.uk
alys.rook@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd.
CF24 0TP

Permitting Service (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Schedule

1. Site Drainage

It is not clear from the information provided in the application what the drainage arrangements will be for the site. For example, some parts of the application state that the drainage will be sealed, whereas section 7 of the Environmental Management System Plan (EMS Plan) states that drainage will be by infiltration.

Action:

- Please confirm the drainage arrangements for the site and when these will be in place.
- Please confirm whether or not all waste will be stored and treated on an impermeable surface with sealed drainage. (Please note that 'drainage by infiltration' as noted in section 7 of the EMS Plan does not constitute sealed drainage.)
- If the operator is planning to discharge the site drainage to sewer, please confirm when this connection will be made and agreed with the sewerage undertaker. (It would be beneficial to gain prior approval from the sewerage undertaker for firewater to be discharged to sewer, as well as daily/general site drainage.)
- If any drainage discharges are proposed other than to sewer, e.g. to groundwater or surface water (with the exception of clean, rainfall dependent drainage from areas of the site not used in connection with the storage and/or treatment of waste, e.g. clean water from roofs of buildings) please provide details of these.
- Please confirm whether or not the proposed linear drain along the Eastern / South-Eastern edge of the Northern Yard will capture all drainage / run-off from the Northern Yard (or any drainage entering the Northern Yard from any other part of the site) and prevent it from leaving the site or infiltrating into the bund / permeable ground along the same part of the site boundary?

2. Fire Prevention and Mitigation (Plan and Measures)

Waste Storage / Stockpile Location

Section 4.2 of the Fire Prevention and Mitigation Plan states that the layout of the stacks will be such as to allow 'unimpeded access around the stockpiles by the emergency services', however drawings 10937 - 001 - C (site (block) plan (proposed)) and 10937 - 001 - E (storage plan (proposed)) show the stockpiles to be located immediately adjacent to the site boundary / fences around the site.

Action: Please confirm whether or not waste stockpiles will be located away from the site boundary / fences and by what the separation distance. Please also confirm whether or not push walls / bays will be used to contain the waste within stockpiles / designated storage areas and to prevent it from spilling over the fence / out of the designated storage areas.

Nearby Sensitive Receptors and Impacts

The plan considers many nearby sensitive receptors, but does not consider the pumping station to the north of the site entrance, or the Tennant Canal (the canal itself and the people who are present along the canal). The plan should also consider the impacts of fire on businesses (e.g. loss of business) and those who use the A465 and other roads nearby for access (e.g. disruption to travel, road closures etc).

Action: Please consider these receptors and impacts and provide the relevant information.

Firewater Containment

Section 3.3.4.3 of the Fire Prevention and Mitigation Plan mentions that aggregate stockpiles and sandbags will be used 'to rapidly reinforce the existing boundary and stop fire water from exiting the site and reaching the Tennant Canal'. Section 6.1 also mentions that, when safe to do so, a firewater containment bund will be constructed 'at the boundary of the site and the Tennant Canal (by reinforcing existing bunding or creating a bund where none exists) to stop fire water flowing from the site at its low point ...'.

It is likely that this will not be possible in the event of a major fire when the site will be evacuated or if the site is unoccupied when a fire occurs. 'Creating a bund where none exists' implies that the bund along this edge of the site will be incomplete. It is also likely that a rapidly constructed 'bund' of soil/aggregates will not be impermeable and therefore not effectively contain all firewater.

Section 5.2.2 regarding inert materials mentions that 'soil and other inert materials that are free of organic materials is helpful in extinguishing fires'. The 'inert stockpile' on site is currently very overgrown (with trees/plants) and therefore contains a significant quantity of organic material, which may fuel a fire and would not be useful in extinguishing it. It would also be difficult to quickly access the soil/material in a fire emergency.

Action: Please provide information to address the above points, and details of how firewater will be contained at the site in the event of fire. The linear drain and proposed connection to sewer (as mentioned in the section above regarding drainage) may form part of the containment measures.

3. Noise and Vibration (Management Plan and Mitigation Measures)

The Noise Management Plan provided with the application mentions the hammer mill as the main source of noise on site, and mentions the two 5m high walls along the sides of the hammer mill and the light-weight roof above it as noise mitigation measures.

The plan also mentions the 'plant associated with the granulation and the electrostatic colour separation of waste PVC' and 'the movement and transportation of waste PVC material around the site using front end loaders and feeding of the conveyor system via an excavator', but does not provide adequate information on how the noise from these sources will be mitigated. The plan mentions that 'these sources/processes are relatively quiet in comparison to the hammer mill', however, they could be more significant/noticeable if the hammer mill is not operation.

The plan does not consider all potential sources of noise on the site. We require the plan to consider all potential sources of noise on the site, including (but not limited to) the loading/unloading of waste containers/vehicles, the sorting/treatment of waste on site, traffic/deliveries, movement and transportation of wastes other than PVC around the site, the weighbridge, and other plant/equipment on site (e.g. vehicles, trommel, cutting equipment and other plant/equipment as listed in the EMS Plan).

The plan does not mention any sources of vibration on the site (for example the hammer mill and other plant/machinery). We require details of any sources of vibration, their significance, and any proposed mitigation measures (if applicable).

Action: Please provide information to address the above points as well as any other applicable information. (This could be in a revised version of the Noise Management Plan, in a revised EMS Plan, or in a separate document.)

4. Waste Acceptance Procedures

The application mentions Waste Acceptance Procedures but does not give details of what they are.

Action: Please provide details of the Waste Acceptance Procedures to be used on site.