



**Cyfoeth  
Naturiol  
Cymru  
Natural  
Resources  
Wales**

**Notice of request for more information**

Environmental Permitting (England and Wales)  
Regulations 2010

## Notice requiring further information

To:

Company Secretary  
Paperback Collection and Recycling Limited  
Unit 1 1a 2 Parkway  
Deeside Industrial Estate Zone 2  
Deeside  
Flintshire  
CH5 2NS

Application number: EPR/JB3932RM/V002

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 16/03/15. The information requested should be sent to the Louise Bailey ([louise.bailey@cyfoethnaturiolcymru.gov.uk](mailto:louise.bailey@cyfoethnaturiolcymru.gov.uk)) by 26<sup>th</sup> June 2015.

| Name                 | Date              |
|----------------------|-------------------|
| <b>Louise Bailey</b> | <b>27/05/2015</b> |

Authorised on behalf of Natural Resources Wales

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## Schedules

1. After further assessment I have split the activities into two facilities:
  1. Waste transfer station with treatment; and
  2. Production of waste derived fuels including RDF, SRF and biomass.

The previous flow diagram provided detailed all proposed treatments in one continuous process. Can you please split the diagram into the two facilities given above?

Based on information from the application, documents and discussion we've had, I have the treatments as:

- a. For the waste transfer station: screening, sorting, separation, crushing, compaction, metal removal (with magnets or eddy current), granulation, shredding (for onward transport only), baling (for onward transport only) and bulking up (for onward transport).
- b. For the waste fuels production: shredding (to achieve particular size or density specification), drying (to achieve a specific moisture content), baling, wrapping, screening (of wood waste), metal removal by magnet or eddy current (of wood waste), chipping (of wood waste), shredding (of wood waste) and bulking up for onward transport.

Please consider if blending should be in here as well. If yes, please can you confirm that blending is carried out to achieve specification? If yes, then the blending activity also counts towards IED 'pre-treatment' threshold (see section 5 below).

Please also consider whether it's more than just the wood waste which you want/need to treat to remove (reduce) metal content. It's likely that if you intend to accept pre-baled 'RDF' and fines into the waste fuels activity that you will need to treat to remove metal contamination of this waste stream too.

2. What waste is being shredded as part of the waste transfer station activity?
3. What waste is being baled as part of the waste transfer station activity?
4. How (and where) is the drying process completed? Is it left 'out' to dry naturally or is it actively dried? If it is the latter, please give information on:
  - a. the method used (is heat applied?)
  - b. how much waste can be dried per batch and how long it takes to dry each batch.

Please note; if you are using heat, we will have to consider the activity against Section 5.5: The Production of Fuel from Waste Part A(1) (a) Making solid fuel (other than charcoal) from waste by any process involving the use of heat.

5. Please provide information on how you will keep below the 50/ 75 tonnes treatment capacity limits that apply to the following treatments within the production of waste fuels facility:
  - a. Shredding
  - b. Drying
  - c. Metal removal
  - d. Blending (?)
6. Waste code 15 01 06 (mixed packaging) has been listed in the production of waste fuels facility waste list. Can you please be more specific on its expected content? We are

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concerned as this could include metals which would have to be removed and therefore count towards the IED limit.

7. Waste codes 19 12 10 and 19 12 12 have both been included within both the waste transfer station and Production of waste fuels facility. As 19 12 10 is for 'actual' RDF and 19 12 12 is for residuals (fines) from waste treatments, it is important to ensure that waste that is accepted on site is coded correctly for what it is, i.e. actual baled and wrapped RDF or baled and wrapped residuals.

You have previously stated, it is intended for RDF to be brought to site with the intention of breaking it apart, sorting it and remaking it. I assume this is the same for the baled and wrapped residuals (correct me if I wrong).

We need to confirm *why* the RDF is being broken apart:

- a. If it is to see what further recyclates can be removed from the 'RDF' and/or the fines, the 19 12 10 and 19 12 12 need to be in the waste transfer station activity. And only 19 12 12 needs to be in the waste fuels activity.
- b. If the intention is to pull apart the baled 'RDF' and fines in order to ensure they're good enough quality or to meet specifications as part of your own (on-site) waste fuels activity, and not to pull out as many recyclates as possible, then the 19 12 10 and 19 12 12 should be in the waste fuels activity ONLY.

Please confirm if it is (a) or (b) that you intend do to. Please let me know if any of the information above is incorrect.

8. Infrastructure of the outside area

As stated previously, our definition of hardstanding is a permeable surface. You have stated that the hardstanding is well compacted so infiltration will be minimal, and run-off can be directed towards the building. No infiltration, and directed run off, are features of impermeable surface, not hardstanding.

Section guidance note 5.06- Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste- states that "Storage area drainage infrastructure should ensure that all contaminated run-off is contained".

While given the content of the RDF/SRP bales there should be minimal contaminated run-off from the waste, we have to look at contaminated run-off that would occur should there be a fire. Given that you state you are producing RDF (to specification), SRF and biomass fuels, all of which are good quality waste fuel, this increase possibility of fire as it is designed to have much better burn.

I recognise that you have fire prevention methods in place, however we have to consider the risk should there be a fire, of which there is still a risk. Should there be a fire, the contaminated fire water must be contained. This cannot occur if the flooring is hardstanding.

The regulations legally require us to ensure appropriate measures are in place to (1) prevent pollution; or where that is not possible to (2) minimise pollution. This requirement can be met by laying impermeable surface and sealed drainage.

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We will only allow the storage of these wastes outside if the infrastructure is impermeable surface with sealed drainage. The options you have are:

- a. Keep the outside area as it is now = No outside storage permitted
- b. Keep the outside area as it is now, but lay impermeable surface at a later date=  
Outside storage is permitted though a future pre-operation condition i.e. waste can only be stored once the impermeable surface has been installed and approved by the local area team

Please confirm which of the 2 options (a) or (b) you wish to choose.

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