



**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
KDK Metal Limited
11 New Street
Pontnewydd
Cwmbran
NP44 1EE

Application number: PAN-001971

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 **20/10/17**.

The information requested should be sent to the following address by **02/01/2018**

Information should be sent to:

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

Or

Email: magda.leonowicz@cyfoethnaturiolcymru.gov.uk

Name

Date

Magda Leonowicz

12/12/2017

Authorised on behalf of Natural Resources Wales

Schedule

1) Noise:

As a result of our assessment of the measures in place to mitigate against the impact of noise, we are not confident that the proposed operations will not cause noise pollution. One of the primary operations which will take place at the site includes baling of ELVs. You stated in the Environmental Risk Assessment that the proposed activities will not likely cause nuisance to nearby receptors due to industrial nature of the surrounding area and the type of plant and machinery used on site. And all activities on site will be carried out to minimise excessive noise and/or vibration beyond the site boundary.

Action: Please state how these activities will be carried out, and what mitigation measures will be taken to minimise excessive noise beyond the site boundary. For more information please refer to our guidance [How to comply with your environmental permit on Noise and vibration p. 47.](#)

Please provide the required information for noise via the e-mail.

2) The fire prevention and mitigation plan (FPMP)

The fire prevention and mitigation plan (doc. ref. 3617-2104-B) submitted does not include all the required information set out in the Fire prevention and mitigation plan guidance with regards to each section - [Fire Prevention & Mitigation Plan Guidance-Waste Management Version2.](#)

Action: Please provide an amended fire prevention and mitigation plan with the following information that must be included:

2.1 The maximum size of any waste pile, stipulating the maximum length, width and depth - Measurements are required to ensure effective firefighting and calculate the amount of water that maybe required to extinguish a fire. (refer to the FPMP guidance, *Managing waste material stacks and separation distances p. 13; Storage of whole end of life vehicles (ELVs) p. 25 and Water Supplies p. 34*).

2.2 The minimum separation (fire break) distance between waste piles or storage areas – Site specific information on separation distances have not been included in the FPMP (see the FPMP guidance - *Managing waste material stacks and separation distances p.13 and Storage of whole end of life vehicles (ELVs) p. 25*).

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Gwefan/Website www.cyfoethnaturiolcymru.gov.uk

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www.naturalresourceswales.gov.uk

Correspondence welcomed in Welsh and English

2.3 Minimise external heating during hot weather by shading from direct sunlight – We require the information on how the combustible materials will be protected from the external heating. The information has not been provided in regards with self-combustible materials including but not limited to tyres stored on site (refer to the FPMP guidance – *Storage times and self-combustion factors p.13*).

2.4 Reviewing and monitoring your Fire Prevention & Mitigation Plan - You only stated in the Section 8.1.1 d) of your FPMP that the FPMP will be reviewed following a fire incident. The guidance states that your FPMP should be treated as a live working document and reviewed regularly (see the FPMP guidance - *Reviewing and monitoring your Fire Prevention & Mitigation Plan p.36*) Please provide:

a) methods and procedures used to maintain compliance as a separate section within your Fire Prevention and Mitigation Plan.

b) all circumstances that would warrant a review of the FPMP, this may include but not be limited to the examples given in the guidance.

c) the areas of the FPMP that would need updating because of said circumstances answered in 2.4. b)

2.5 Site plan – the following features that must be included, but have not been included in the fire plan. We require you to provide the amended site plan that includes (see the *FPMP contents* guidance p.8):

a) the location of plant, protective clothing and pollution control equipment and materials

b) the location of drain covers and any pollution control features such as drain closure valves and firewater containment systems

c) the location of “off- site” emergency information pack with site plan (as specified above)

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2.6 The fire prevention and mitigation plan lacks detailed methodology; some areas are not site specific. It is not merely suitable to state it will be done in line with NRW's guidance. You need to state what you as the operator will be doing on site.

Action: Please amend your FPMP as appropriate, and include site specific information for the following points:

- 4.2.1 Fire breaks,
- 4.2.4 Separation distances
- 4.3.1 Combustible waste storage.

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