

**Notice of request for more information**

Environmental Permitting (England and  
Wales) Regulations 2010

**Notice requiring further information**

**To:** Company Secretary  
Associated British Ports  
Aldwych House  
71-91 Aldwych  
London  
WC2B 4HN

**Emailed to:** Alan Potter: alan@beyond-waste.com

**Application number: EPR/UB3890HU**

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 **10/06/15**.

The information requested should be sent to the following address by **13<sup>th</sup> November 2015**

**Information should be sent to:**

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

**Email:** ella.williams@cyfoethnaturiolcymru.gov.uk

Name

Date

**Ella Williams**

**30/10/2015**

Authorised on behalf of Natural Resources Wales

# Schedule

## 1. Drainage

Appendix 3 of "Controlled Waters Risk Screening Review" (Version 1.2) shows the site plan with the discharge point as a line along the length of Roath Dock. I am unclear if this means there is one large outlet, several small outlets or otherwise. In addition, I am unable to see this drainage plan clearly as it is small and loses clarity when zoomed in on the electronic version. There is also no key to represent what is being shown. I am therefore unable to determine if the drainage is adequate for the proposed activity.

**Action:**

- a. Please confirm if there is one outlet or several outlets discharging to the surface water.**
- b. Please provide an amended drainage plan, which:**
- **shows the discharge points;**
  - **shows where all areas of the site will drain to;**
  - **shows where the interceptor is located; and**
  - **has a key,**

It is mentioned that there is an interceptor in section 3 of "Controlled Waters Risk Screening Review" (Version 1.2) but there is no information about the type of interceptor proposed, so I'm unable to determine if it is suitable for the activity.

**Action:**

- c. Please provide details of the inceptor proposed, including but not limited to:**
- **what class type it is;**
  - **its capacity to be sufficient for the expected catchment of the site; and**
  - **what run-off it is designed to capture before final discharge to surface water.**

## 2. Waste Types and storage

Our default position for storing non-hazardous waste is to be on impermeable surface with sealed drainage. You have proposed to store woodchip on hardstanding and have used the generic risk assessment for standard rules permit (SRP) SR2011No4 as evidence for allowing this. As the permit you have applied for is not the same as the SRP, and because you wouldn't meet the criteria for said SRP, we have to assess this proposal.

I require further information to assess if your management system will be suitable to store non-hazardous waste on hardstanding as proposed.

**Action:**

- a. Please provide your waste acceptance and storage procedure to ensure that the waste types proposed to be stored on hardstanding would not pose a risk to land, surface water and groundwater**

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Correspondence welcomed in Welsh and English

**b. Please clarify what specific wastes you intend to take under the following waste codes that you have proposed in form B4 of the application, as these codes can cover a number of different wastes:**

- **17 09 04 - mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03**
- **20 02 01 - biodegradable waste**

**3. Fire** - Please provide the following information in an amended fire management plan. NRW currently refer to TGN7.01 as the relevant guidance for fire risk. The information in your plan should be in line with this guidance, or equivalent guidance only if it minimises the risk in the same way. If you deviate from this you must give a clear reason why this will not result in an overall increased risk of fire on the site.

The Fire Prevention Plan (FPP) (Issued October 2015 Version: 1.1.) states that woodchip and RDF will be stored in separate stockpiles to reduce the risk of fire between the two materials. The information about stockpiles in the fire plan is not sufficient enough to determine if the risk of fire from the activity has been minimised appropriately.

**Action:**

- a. Please provide information on the length, height and width of stockpiles and minimum separation distances between the stockpiles and the site boundary. This will need to address having both RDF and woodchip on site at any one time, and also just woodchip alone on site.**
- b. Please also provide this on a site layout plan with measurements of the stockpiles and distances.**

In the FPP there is no reference to RDF being monitored using temperature probes, only woodchip.. Therefore I assume RDF fire detection monitoring will not be taking place.

**Action:**

- c. Please confirm if RDF will be monitored. If it will, please provide detailed information of your monitoring proposals...**

**4. Odour** – please provide the following information in an amended odour management plan. Your OMP should be in line with H4 guidance. Where the NRW version refers to appendices, please refer to the Environment Agency version of the H4 guidance.

In the Odour Management Plan (OMP) version 1.1., it states that it has been produced to address any potential odour issues arising from the RDF handling activity in particular. Therefore I assume that the OMP does not refer to woodchip storage. “How

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to Comply” guidance states that this type of waste activity must have an odour management plan, therefore all waste types must be managed in the OMP.

**Action:**

- a. Please provide an amended odour management plan that includes how the risk of odour from storing woodchip will be managed.**

You state in the OMP that damaged bales identified on delivery to site will be sent back to the supplier. The OMP also states that any bales damaged while on site will be isolated and repaired by the supplier.

**Action:**

- b. For the bales damaged on site, please clarify if there will be re-wrapping of bales on site, or if they will be returned to the supplier.**
- c. If the re-wrapping is to be carried out on site, please clarify who will be undertaking this (the permit holder, supplier, or otherwise) and provide information on how this process will be managed by the operator.**

I am unable to assess the contingency plans in the OMP. It should cover foreseeable eventualities, including but not limited to breakdown of plant, staff being sick, adverse weather etc.

**Action:**

- d. Please amend this section of the OMP to explain what contingency measures are in place for potentially foreseeable events in line with the guidance.**

## **5. Pests Management Plan**

There is no reference in any risk assessment or management plans of how the risk of pests are to be managed and minimised. Due to the nature of the waste types proposed, this is a risk and needs to be addressed.

**Action:**

- a. Please tell me which parts of your management system will manage the risk of pests (and what pests), or amend the management system(s) to address this point.**

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