

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

**To: Company Secretary
Mekatek Limited
Mbg House
Unit C
Maerdy Industrial Estate
Rhymney
Tredegar
NP22 5PY**

Application number: PAN-001944

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 **04/10/17**.

The information requested should be sent to the following address by **20 December 2017**.

Information should be sent to:

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

Name	Date
Kate Thomas	28 November 2017

Authorised on behalf of Natural Resources Wales

Schedule

1. Fire prevention plan (FPP) – document reference MK-E11

We have reviewed the FPP submitted with the application. In addition to this and in line with our process the application was sent to the Fire and Rescue Service for consultation. Whilst the FPP has been produced in accordance with the current guidance, the plan lacks information in some areas. These are listed below:

- I. The amount and type of waste received daily and how it is managed**
Weekly and annual amounts are included but the plan does not include daily amounts.
- II. The total amount of waste & the types and forms (e.g. unprocessed, shredded, chipped, fines or baled) that are stored on site at any one time and how it will be stored**
Table 3.2 'waste storage information' provides some of this information, however not all storage areas include all the information on the type of waste that is stored there or it's form as specified in the guidance (as detailed above). The plan should specify how each waste type will be stored.
- III. The location within the site where each type of waste will be stored**
Table 3.2 'waste storage information' includes areas 1, 2, 3 etc. and includes "combustible and non-combustible waste" but does not specify where each waste type is stored.
- IV. The minimum separation/fire break distance required between all waste/baled waste stacks, and between buildings and waste/baled waste stacks**
Section 3.4.1 states that "the WEEE reception bay does not require any separation distances as it is in a sunken concrete bay". However, waste is not exempt from separation distances because it is stored in a sunken bay and the relevant separation must be provided.
Annex 3 – Detailed site plan includes "Partially constructed fire bunker".
Please provide an explanation on what this means.
Please confirm what the separation distances are between areas 4 & 5, and the distance from these areas to the block moulding area.
- V. A clear area must be established around the perimeter of the site; this can vary depending on layout of your site and permitted stack sizes in accordance with separation distances as illustrated in Table 2 (this must be available at all times and identified on your site plan)**
This is not included in the site plan. In accordance with the guidance this information must be submitted.
- VI. all combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on the community, critical infrastructure and the environment) and how they will be minimised**

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Section 3.10 includes details on the containment of fire water. However, emissions to air have not been considered or been included. Your plan should identify that in the event of a fire incident - if emissions to air will affect any local receptors and if so, what measures will be taken to mitigate these.

- VII. *contact details of sensitive receptors within 1km of your site***
In high density areas with a large number of receptors it may be unreasonable to expect provision of all contact details. In these circumstances, we may agree a plan of action to be taken in the event of an incident that may affect those receptors. If the plan involves other agencies such as police/local authority evidence of agreement must be provided.

Receptors have been listed in the plan but no contact details or contingency plans are included. In accordance with the guidance this information must be submitted.

- VIII. *The site plan is attached an Annex (annex 3a). Please note that this plan should be included in the fire plan. The fire plan should be a standalone document that includes all the relevant information.***

The plan does not consider the following or include this information on the site plan:

- Environmental receptors for example source protection zones, surface waters, potable abstractions, groundwater, protected habitats, fisheries
- how safe access to the site for fire and rescue services and other emergency responders is achieved
- any alternative access points around the site perimeter to assist fire fighting
- any watercourse, borehole or well located within or near the site
- areas of natural and unmade ground
- location of "off- site" emergency information pack with site plan
- assembly point for staff and visitors to site

- IX. *Baled waste storage - If you are storing waste in bales your FPMP must show how you are reducing the risk of a fire occurring within the bales.***

The FPP does not specify what waste types are being stored in bales. The FPP states that due to the types of waste monitoring is not considered necessary, however without knowing what waste is being baled we cannot agree with this statement.

- X. *Managing water run-off.***

The FPP states: "In the event of a fire, the WEEE reception delivery bay will be utilised as a holding bund for firewater. All firewater will drain to the bay which will be isolated from the surface water drainage system via a penstock valve."

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Please confirm how fire water run-off will be directed to WEEE reception area and what will prevent run-off from leaving the building and soaking to ground?

XI. During and after an incident

The FPP includes some contingency measures in place for dealing with issues during and after a fire. However, the FPP does not include the steps you must take before the site can become operational again, which is a requisite of the guidance.

ACTION: Please provide a revised FPMP that includes the above information, as specified in the guidance.

2. Industrial Emissions Directive (IED) Limits

The activities in the application fall under the Industrial Emissions Directive. For the site to remain as a “waste facility” the EMS must include information detailing how the activities will be carried out to ensure that the activities do not exceed these limits. If the intention is for the site to operate above these limits, an installation permit is required. The limits that are relevant to the proposed activities are:

- **Hazardous waste treatment: 10 tonnes per day**
- **Non-hazardous waste treatment for disposal: 50 tonnes per day.** Aggregated capacity for the following waste treatment types:
 - physico-chemical treatment
 - pre-treatment for incineration or co-incineration,
 - treatment in shredders of metal waste
- **Non-hazardous waste treatment for recovery: 75 tonnes per day** (or 100 tonnes per day if the only activity is anaerobic digestion). Aggregated capacity for the following waste treatment types
 - pre-treatment for incineration or co-incineration,
 - treatment in shredders of metal waste
- **Hazardous waste storage: 50 tonnes** (at any one time).

For example, section 2.3 of the EMS states: *“Shredding: As required any material that needs to undergo shredding or mechanical liberation will be transferred to the rotorshredder. The rotorshredder processes approximately 4.5 tonnes per hour”.*

Section 2.3.10 hours of operations states: *“It is the intention to operate the site on a 24/7 basis should the workload require.”*

If the shredding of metal were to be carried out 24 hours per day, the total amount treated would be 108 tonnes per day. This exceeds the IED limit above.

For the site to remain as a waste facility measures will need to be in place to limit

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treatment in shredders of metal waste.

ACTION: Please provide a revised EMS that details what measures will be used to ensure that the activities carried out on site do not exceed the IED limits listed above and therefore ensuring that the site operates as a “waste facility”. This includes measures to limit the following:

- **Hazardous waste treatment: 10 tonnes per day**
- **Non-hazardous waste treatment for disposal: 50 tonnes per day (*if treating for disposal*)**
- **Non-hazardous waste treatment for recovery: 75 tonnes per day**
- **Hazardous waste storage: 50 tonnes**

3. Recovery and disposal codes

Section 2.1 of the application includes the following recovery and disposal codes:

- *R3 Recycling/reclamation of organic substances which are not used as solvents;*
- *R4 Recycling / reclamation of metals and metal compounds; and*
- *R5 Recycling / reclamation of other inorganic material;*
- *R13 Storage of wastes pending any of the operations numbered R1 to R12;*
- *D9 Physico-chemical treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12;*
- *D14 Repackaging prior to submission to any of the operations numbered D1 to D13;*
- *D15 Storage pending any of the operations numbered D1 to D14;*

The non-technical summary states:

All recovered / processed materials are then stored within dedicated storage bays ready for offsite transfer and sale. Any waste materials that are not able to be recycled on site are stored pending off site transfer to other licensed waste management facilities for further processing or disposal.

This implies that the primary function of the site is to accept and treat waste for recovery purposes.

If the intention is to accept waste for recovery purposes and it is incidental that some waste cannot be recovered and needs to be sent for disposal, the disposal codes do not need to be included in the permit. However, if the intention is to accept waste for disposal, the disposal codes should be included.

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ACTION: Please confirm if the intention is to accept and treat waste for disposal. Please note that if intention is to accept and treat waste for disposal, measures will need to be included in the EMS to demonstrate how the site will comply with the IED limits of “Non-hazardous waste treatment for disposal: 50 tonnes per day”.

4. Internal road

The site plan includes a road running through the site. The EMS states that this is an internal road.

ACTION: Please confirm that this is a private road that does not allow access to other users apart from the operator.

Please note: the reason we need confirmation of this is to ensure that only the operator can access the site and this prohibits any other users of the road that could deposit waste, for which the operator would be responsible for as the permit holder.

5. Batteries and accumulators

Waste code 16 06 05 other batteries and accumulators is included in the list of wastes to be accepted. The EMS refers to the storage of batteries.

ACTION: Please confirm if batteries and accumulators are to be treated (*apart from being bulked up for onward transfer*) or if they are to be stored only. If they are to be treated, please revise the EMS accordingly.

6. Odour management plan (OMP)

Section 2 of the OMP states “*if the load is rejected it will be moved to the quarantine area and photographed*”. However, the OMP does not include the following details:

- How rejected waste will be stored in the quarantine area.
- How long the waste will be stored prior to being removed from site.

ACTION: Please provide a revised OMP with the above information.

7. Wood

The EMS refers to “*the storage of wooden pallets which are stored before being collected and transferred off site*” and annex A3 includes an outside wood storage area. If these pallets are used to transport waste to and from site, then they are not considered as “waste”. However, the list of waste includes; 15 01 03 wooden packaging and 20 01 38 – wood other than mentioned in 20 01 37.

ACTION: Please confirm if these wastes codes have been included to account for waste wood that is to be accepted on site. If so, the EMS and FPP will need

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to be revised to account for this waste including the type of treatment, storage etc.

If these waste codes are to account for the wooden pallets, please provide a revised list of waste codes removing these waste codes.

8. Waste storage after treatment

The EMS does not specify where the waste will be stored after it has been treated or how long it will be stored for prior to being removed from site.

ACTION: Please provide a revised EMS that includes this information for each of the waste types accepted on site.

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