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Kate Thomas,
Permitting Service,
Natural Resources Wales,
Cambria House,
29 Newport Road,
Cardiff,
CF24 0TP

Date: 1st December 2017

Our Ref: SOL1707MK01

Dear Ms Thomas,

RE: MEKATEK LTD – PAN-001944

Further to your email dated 28th November, please find below response to each of your questions in turn:

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

- 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.

Due to the waste processed at site being supplied by variable contracts, it is not possible to accurately state the quantities of waste received at the site, as it will be subject to variation from day to day.

The site will be managed in strict accordance with the FPP and no additional waste will be accepted on site if the storage areas are at full capacity.

The total storage capacities are:

- WEEE Reception: 264m³;
- Area 1: 1,400m³
- Area 2: 2,600m³;
- Area 3: 500m³;
- Area 4: 1,800m³; and
- Area 5: 800m³;
- **Total Storage: 7,364m³.**

Additionally, the site will be managed in strict in accordance with the IED limits, resulting in no more than 50 tonnes of hazardous waste being stored on site at any time.

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.

Table 3.2 has been updated with the updated FPP to show how waste is stored within each area.

The updated FPP is provided within Annex 1 of this letter.

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.

As the quantities accepted on site will be variable, it is not possible to specify exactly where each waste type is stored.

A decision has been made to segregate the wastes into combustible and non-combustible storage areas. Within the FPP and the site plan it clearly shows where combustible and non-combustible material is stored (i.e WEEE reception bay, Area 1, Area 2, Area 3, Area 4 and Area 5). This approach was agreed during the site visit with Rob Salter.

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.

Section 3.4.1 and 3.4.3 have been updated. A concrete fire wall will be constructed along western side of Area 1, opposite the WEEE reception bay. This ensures that Area 1 and the WEEE reception bay are separated appropriately in accordance with the guidance.

The fire wall will be constructed of grout sealed 'Legio' block fire walls, ensuring a 1m freeboard at all times. The wall will offer a fire resistance period of at least 120 minutes.

Annex 3 – Detailed site plan includes "Partially constructed fire bunker". Please provide an explanation on what this means.

The phrase "partially constructed" has been removed from the FPP site plan due to being misleading. This purely related to the fact that the concrete wall does not surround Area 4 in its entirety.

The concrete fire wall will be constructed on the western and southern end of the storage area to mitigate the risk of fire from Area 1 and Area 5 which negates the requirement for a 31m separation distance.

The concrete fire wall will be 4m high and constructed of grout sealed 'Legio' block fire walls, ensuring a 1m freeboard at all times, as stated within the FPP.

Please confirm what the separation distances are between areas 4 & 5, and the distance from these areas to the block moulding area.

The block moulding area is external to the main building and is separated from Area 5 by the building fabric.

The separation distance between Area 4 and Area 5 is 8.4m. The use of the concrete fire wall negates the requirement for a separation distance.

- 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.

The plan has been amended to show a clear area around the site as required.

- 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*

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.

Section 3.10 of the FPP has been updated to provide further information on how local residents will be alerted in the event of a fire.

Due to the site being located adjacent to a residential area, it is unreasonable to maintain an accurate database with the contact details of all nearby receptors, therefore, in the event of a fire that may impact the sensitive receptors, the following action plan has been developed:

- The site will have a mobile tannoy on site. This will be used to alert nearby residents / businesses that there is a fire on site and that there is the potential need for evacuation;
- As well as this, trained site operatives will knock on residents' doors surrounding the site to ensure that they are aware of the fire. The site operatives will start at the nearest residential receptors on Wellington Way.
- The use of the tannoy and knocking on peoples' doors ensures that all nearby residents are made aware of the fire on site.

- 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.

Please see response to question 1 vii).

- viii) *The site plan is attached as 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*

The only environmental receptors are the River Rhymney which runs underneath the site, a lake to the west of the site and springs to the west of the site. These are shown on the sensitive receptor plan provided in Annex A of the updated FPP.

These receptors are now identified within Section 2.1 of the updated FPP.

- how safe access to the site for fire and rescue services and other emergency responders is achieved

The fire access route shown on the site plan will be inspected as part of the site walkover inspections to ensure that safe access to the site for fire and rescue services and other emergency responders is always maintained.

In the event that anything is blocking the route, it will be immediately flagged to the Site Manager and removed.

The clear area around the perimeter of the site and the alternative access point described below will also be checked as part of the site walkover procedure.

The plan has been updated and included within the site walkover procedure.

- any alternative access points around the site perimeter to assist fire fighting

An alternative access point has been added to the site plan. The entrance is accessed via the adjacent Williams Medical Services site.

This access point will also be checked as part of the site walkover procedure.

- any watercourse, borehole or well located within or near the site

The watercourses located near the site are shown on the sensitive receptor plan shown in Annex A of the updated FPP.

These receptors are now mentioned within Section 2.1 of the updated FPP.

- areas of natural and unmade ground

Areas of natural and unmade ground have now been included within the site plan.

- location of "off-site" emergency information pack with site plan

An off-site emergency information pack is provided in a box on the main gate into the site and contains emergency contact numbers, a site plan and copy of this FPP.

This is shown on the updated site plan provided within Annex 1 of the FPP.

- assembly point for staff and visitors to site

The assembly point for staff and visitors in the event of a fire is located opposite the weighbridge by the grass verge.

The assembly area is shown on the updated site plan provided within Annex 1 of the FPP.

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.

Examples of waste types stored in bales are:

- Cardboard;
- Plastic; and
- Electrical Waste e.g circuit board and cable.

This has been updated within Section 3.4.2 of the FPP.

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."

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?

Fire water runoff is directed to the WEEE reception area due to the fall of the building. All water will drain into the area.

The penstock valve prevents run-off from leaving the building and soaking to ground, as it ensures that all firewater is contained within the drainage system.

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.

The following stages will take place before the site can become operational again:

- The site will be thoroughly cleaned after an incident. Any charred / partially combusted / combustion products will be disposed of at an appropriate facility. It is anticipated that the clearing of combusted material will not take long, as the company are confident that any fires will be appropriately controlled and therefore will not result in significant volumes of burnt waste.
- All fire water will be captured by the drainage system and transferred off site via tanker and appropriately disposed of.
- All equipment will be checked for any fire damage. In the event that any equipment has been damaged, it will be removed from site and fixed / replaced as soon as possible.

2. 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

The shredder has a maximum throughput of 4.5 tonnes per hour. Although the site will be operated 24/7, the shredder will only be operated when required.

The activities on site will not exceed the IED limits. This is ensured by the sites management system.

Please refer to the procedures provided within Annex 2 of this letter.

The 'Nav Stock' System is a 'live' system which provides the management control to ensure effective processing of material. The system also ensures that the storage and processing of material is carried out in accordance with the permit conditions i.e storage of hazardous material is below 50 tonnes. The treatment of waste is carried out on a batch process; therefore control is in place to ensure that treatment limits within the permit conditions are adhered to at all times.

The Nav Stock System provided within Annex 1 is for illustration purposes only, the Nav Stock system is highly complex and is the result of many months of development to ensure that all processes and storage is captured.

The system is also capable of reporting the following:

- Stock by location on site (area, bay etc);
- Container and ticket number;
- Non-hazardous waste stored on site;
- Treatment status of material;
- Date of arrival on site.

MS 331 and MS 338 demonstrate how the processing of material on the machinery is tracked, to ensure that the site is not processing outside its limits.

3. *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".*

The inclusion of the disposal codes was an error. Waste will not be accepted and treated on site for disposal.

We can confirm that the primary function of the site is to accept and treat waste for recovery purposes.

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.

I can confirm that the road running through the site is a private road that does not allow access to other users apart from the operator.

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.

There will be no treatment of batteries and accumulators on site.

Batteries and accumulators are only stored, sorted and then transferred off site.

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.

The statement in MK-E03 regarding the removal of odourous waste to the quarantine area was an error.

In the unlikely event that odourous waste is accepted on site, it will be immediately rejected off site. No odourous waste will be stored or processed on site.

The OMP has been updated and is provided within Annex 3 of this letter.

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 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.

The wooden pallets are used to transport waste to and from site. These pallets are re-usable wooden packaging therefore are not considered as waste.

On the basis of the above, the codes 15 01 03 – wooden packaging and 20 01 38 – wood other than mentioned in 20 01 37 can be removed from the list of waste codes accepted on site.

The revised EWC code list is provided below:

Revised Feedstock EWC Codes and Types	
Waste Codes	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 04	waste plastics (except packaging)
02 01 10	waste metal
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 02	wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	waste plastic
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	wastes from the photographic industry
09 01 07	photographic film and paper containing silver or silver compounds
09 01 10	single-use cameras without batteries
09 01 11*	single-use cameras containing batteries included in 16 06 01, 16 06 02 or 16 06 03
09 01 12	single-use cameras containing batteries other than those mentioned in 09 01 11
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 02	ferrous metal dust and particles
12 01 03	non-ferrous metal filings and turnings
12 01 04	non-ferrous metal dust and particles
12 01 05	plastics shavings and turnings
12 01 17	waste blasting material other than those mentioned in 12 01 16
12 01 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 01 12	brake pads other than those mentioned in 16 01 11
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 19	plastic
16 01 22	components not otherwise specified
16 02	wastes from electrical and electronic equipment
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from removed from discarded equipment
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15

16 06	batteries and accumulators
16 06 01*	lead batteries
16 06 02*	Ni-Cad batteries
16 06 03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 03	plastic
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 10	waste from shredding of metal containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03
19 10 06	other fractions other than those mentioned in 19 10 05
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 21*	fluorescent tubes and other mercury-containing waste
20 01 23*	discarded equipment containing chlorofluorocarbons
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 39	plastics
20 01 40	metals
20 03	other municipal wastes
20 03 07	bulky waste
Total	Aggregate Quantity of all wastes listed above will be less than 30,999 tonnes per annum

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.

All waste will be stored in accordance with the FPP. Once treated, waste will be stored within Area 2, Area 3, Area 4 or Area 5 and will be stored for a maximum of 3 months.

Should you have any further questions in relation to the above please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Butler', enclosed within a thin black rectangular border.

Steve Butler

ANNEX 1: UPDATED FPP

ANNEX 2: MANAGEMENT PROCEDURES

