

# Notice of request for more information

## The Environmental Permitting (England & Wales) Regulations 2016

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Company Director(s)

ETM RECYCLING LIMITED

81 Hartcliffe Way

Bristol

England

BS3 5RN

Application number: EA/EPR/EP3794SH/V003

The Environment Agency, 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 duly made on 19/08/2021.

Send the information to either the email or postal address below by 25/02/2022. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Postal address:

Permitting and Support Centre

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

| Name                                    | Date       |
|---|------------|
| Victoria Nicholls<br>Permitting Officer | 19/01/2022 |

Authorised on behalf of the Environment Agency

## Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

## Fire Prevention Plan

You must consider the 'Fire Prevention Plans: environmental permits' guidance (updated 11/01/2022) [GOV.UK](https://www.gov.uk/guidance/fire-prevention-plans-environmental-permits), hereafter referred to as the guidance, and come to your own view as to what proposals you consider will meet the objectives to:

- minimise the likelihood of a fire happening;
- aim for a fire to be extinguished within 4 hours; and
- minimise the spread of fire within the site and to neighbouring sites.

You can follow the measures set out in the guidance and if you do so you will meet the objectives of the guidance and we are likely to approve your Fire Prevention Plan (FPP). If you do not include these measures you can propose alternative measures to meet the objectives. We will technically assess your alternative measures and, if we are satisfied that they meet the objectives, we can approve the FPP.

If your proposals do not meet the measures in the guidance, you should explain in detail the alternative measures you intend to take and how those measures can meet the objectives. This applies to each of the information requests in the attached schedule.

## Schedule

### Fire Prevention Plan

Provide a revised Fire Prevention Plan which addresses the following:

1. Provide further details of how external heating of wastes during hot weather will be taken into account and confirm that waste will be shaded from direct sunlight if required and/or any other techniques that will be in place to enable heat generated within the pile to be released.

*Reason:*

*Section 4.4.2 of your FPP states that in the event of a drought period or weather conditions exceeding 75 degrees C, dousing with water will take place. We consider 75°C a very high temperature. You need to confirm the trigger temperature at which dousing with water of uncovered waste piles would take place and justify why this temperature is suitable.*

*You also need to define what you consider 'a drought period' so that it is clear in what situations the dousing measure may be used and how the staff will know when to apply water in hot weather.*

**Section 4.4.2 updated; please also refer to updated sections 4.1, 4.2, 4.3 and site layout plan.**

2. Provide details of where rejected wastes or hot loads will be stored or isolated.

*Reason:*

*Rejected waste containers are mentioned in 2.1.1 of the FPP but a location for these is not stated. You need to be clear where these containers will be/could be stored.*

**Section updated, please also see section 3.4.**

3. Explain how the stated maximum storage durations of combustible wastes of less than 12 hours are managed, monitored and recorded.

*Reason:*

*Maximum storage durations of the different waste types are stated in Table 4.1 as being less than 12 hours, but it is not clear how this is practically controlled and monitored in practice.*

**Table 4.1 updated and should be read in conjunction with updated Sections 4.1 – 4.5. The plant can process 70 tonnes / hour which comfortably exceeds the amount of waste received at the site on the daily basis. Ordinarily waste is stored for no longer than 12 hours but we have now put 5 days in the event of a breakdown.**

4. Confirm if baling of wastes is an activity carried out at the site, and if so, include bale storage locations on the site plan and provide details of maximum volumes and sizes of any waste bale piles on site

*Reason:*

*Section 1.3.1 says that baling is one of the activities to be carried out at the site but there is no baled waste pile marked on the site plan and there is no baled waste listed in table 4.1.*

**See Section 1.3.2.**

5. Confirm if there are will be any baled wastes that will be stored for longer than 3 months. For any baled wastes that are to be stored for longer than three months, you need to provide:
- details of the monitoring of the baled wastes.
  - details of the sampling and testing protocol you will use to make sure you assess a representative number of bales (minimum 10%) during monitoring.
  - confirm that you will obtain representative temperature readings from the centre of the bales and from bales within the centre of a pile.
  - confirm if you will turn the bales to make sure the waste stays cold.

**See response to previous question.**

6. Explain the shredding/storage process regarding storing waste materials in their largest form (i.e., reducing storage times for treated wastes, for example by organising any size reduction treatment as close to removal of material from site as possible).

*Reason:*

*Section 5.1.2 states that wastes will be stored in their largest form but section 1.3.1 says that shredding is one of the activities to be carried out at the site.*

**Section 5.1.2 removed, refer to sections 4.1 – 4.4.**

7. Explain how adequate freeboard space is maintained at the top of all of the waste storage bays containing combustible wastes.

*Reason:*

*In Table 4.1 you have stated that the maximum height of the waste piles in bays will be 3m and that the bay walls and fire walls are 3m high. It is not clear how there will be a sufficient freeboard space, if the waste and the walls are the same height. You need to be clear how you will control wastes to keep clear a 'freeboard' space of at least 1m at the top and sides of bay walls at all times to prevent fire spreading over and around bay walls/fire walls.*

**Table 4.1 has been updated, freeboard at all times will be 1m. The operator is extending the current height of the walls which will be complete prior to the issue of this variation.**

8. Explain how adequate separation is maintained between the top of waste piles in the bays/piles where machinery is above.

*Reason:*

*Clarification required regarding the two-dimensional site plan where the 0.2m wide concrete panel walls to separate the waste piles located adjacent to the conveyor appear to cross the conveyor. Having seen some recent photos of the site, it is apparent that some of the storage bays are underneath the conveyor system.*

**See section 5.3.5.**

9. Explain how the loose piles of waste located outside (namely Area 18 and the shredded waste pile) and in the buildings (namely Area 1 and 2) will be controlled so that pile sizes do not exceed the stated maximum sizes and so that 6m separation distances between piles are maintained.

*Reason:*

*You need to explain how loose waste piles will be controlled so that separation distances are maintained, and, in the case of shredded wastes outside you need to explain how the pile will be controlled so that the space for the quarantine area in the yard will be maintained and kept clear.*

**See Section 5.2**

10. Provide further explanation to demonstrate that you do have a pragmatic approach to control the waste in the quarantine area and will ensure that separation distances, volumes, and access points for the FRS can be maintained when the quarantine area is full.

*Reason:*

*You have stated that 50% of the largest waste pile/200m<sup>3</sup> of waste can be stored in the quarantine area if the waste is piled up to 4metres height across the whole quarantine area. You need to explain how the quarantine area will be used and how the waste pile will be controlled and justify how stacking loose waste the height of 4 metres in an emergency situation will be safely achieved.*

*If this is not realistically possible, consider if you need to explore if maximum pile sizes should be reduced to reduce the 50% volume of waste required to be dealt with, or consider other options such as making space for a larger quarantine area or providing a second smaller quarantine area.*

**See updated section 7 and site plan.**

11. Provide details of how you will use booms to contain the fire water run-off from entering the environment. You need to mark on a site plan where the booms will be placed.

**See Section 11.3 and site plan which shows where the boom will be placed. There is only one area where fire water could escape which is the site access. The interceptor would be shut off in a fire event as shown on the site plan.**