

ENVIRONMENTAL FOCUS

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Fire Prevention & Mitigation Plan

LCS Scrap Metals Ltd

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Requirement:	Fire Prevention & Mitigation Plan	
Date of Submission:	October 2022	
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Version number and date:	First version completed	November 2022

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1. Introduction

- 1.1. Environmental Focus Ltd has been commissioned by LCS Scrap Metals Ltd to create a Fire Prevention and Mitigation Plan (FPMP) that is to be used at a new permitted facility. The facility (the site) is to allow the storage and treatment of metal wastes with ELV ATF.
- 1.2. The Natural Resources Wales (NRW) Fire Prevention and Mitigation Plan Guidance-Waste has been used to formulate this document. The site is located on a longstanding and well-established rural/agricultural area. Site neighbours are very few and are agricultural in nature with a DCWW waste water treatment site next door, in the wider environment, both residential and agricultural land surround at varying distances.
- 1.3. There are no environmental sensitive areas within the parameters identified within the SR permit.
- 1.4. The purpose of this report is to provide an assessment of the risk from fire on site and how the storage measures impact upon the risk. In addition to this where appropriate, recommendations will be made to ensure compliance with recommended fire guidance. Compliance with the recommendations will greatly reduce the risk to business continuity and the environment associated with large fires on sites of this nature.
- 1.5. The site is used generally for the receipt, treatment, and recycling of various waste metal materials from a variety of sectors including ELVs.

2. FPMP Internal Responsibility

- 2.1. The overall responsibility for managing the site on a day to day basis is to be undertaken by the site supervisor. The Company Director has the responsibility of ensuring that the supervisor has all the required tools and resources available to allow him to comply with the measures detailed within this plan.
- 2.2. Independent site audits are undertaken each month to discuss current and planned operations. The audit will aim to identify any areas where improvement is required and promote elements that have a positive impact on reducing Fire risk on site. If any changes to the way in which the site operates are identified, the FPMP will be updated and submitted to NRW proactively.
- 2.3. All staff are to be aware of the location of the FPMP (and other relevant management documents).

3. Site Activities

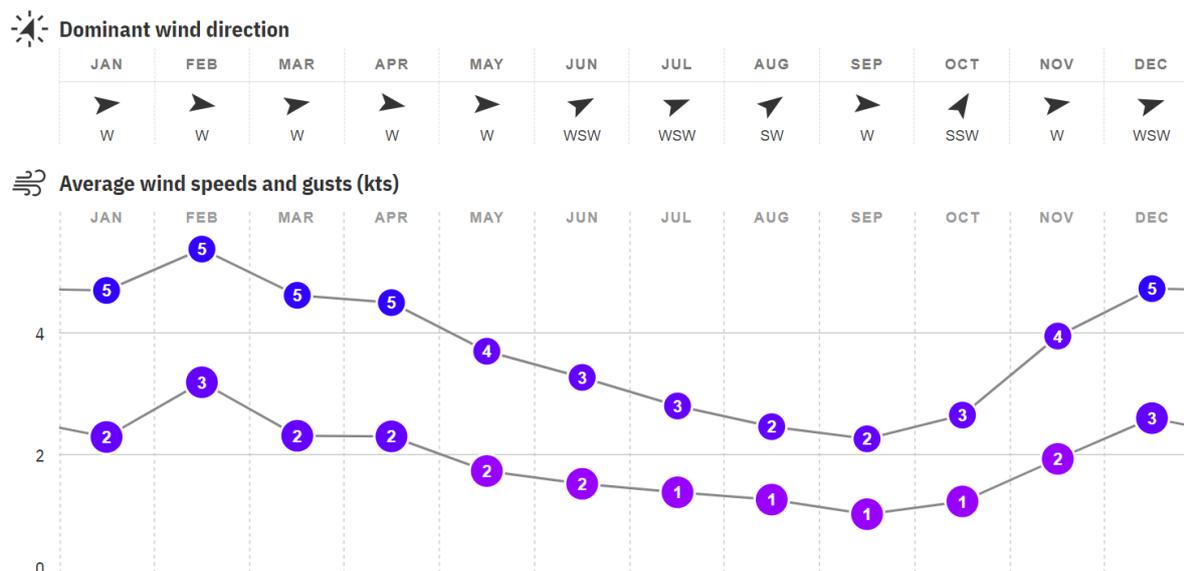
- 3.1. The total quantity of waste that can be accepted at a site under the SR permit must be less than 25,000T a year for metals and 5,000T for ELV wastes.
- 3.2. Metal recycling treatments involve the sorting, separation, grading and baling of ferrous metals or alloys and non-ferrous metals for recovery.
- 3.3. Any lead acid batteries that are accepted are separated from other wastes. No treatment of the batteries is to be undertaken on site. They are stored in weather-proof containers. The maximum quantity of hazardous waste treated does not exceed 10T per day, regular checks will be undertaken to ensure that the maximum quantity stored at one time does not exceed 50T.
- 3.4. Separate areas are used for the storage of mixed metals from the ELV wastes. The storage and processing area of the yard dedicated for mixed metals is within a secure yard made up of a concrete base, concrete block walls (to approximately 1.5m) and then a large earth bund where a smaller kerb area is used to seal the treatment area. The building on site is made of steel cladding for the upper section of the walls and roof with the lowest 2m made of concrete. The front and rear of the building are open, to allow easy movement into and out of the building. This section of the yard doesn't have any drainage system due to the sealed nature of the building. Any spills from the waste will be contained to the footprint of the building and will be cleaned up using appropriate spill kits.
- 3.5. Only wastes listed within the permitted wastes table detailed within the permit will be accepted for storage/treatment. However, at this time, the site are only accepting mixed metal wastes, small levels of ELVs and then batteries that have come from the depollution process.

4. Environmental Setting

- 4.1. The site is located to the North of Broadmoor within an established, longstanding rural setting. The site forms part of a small holding that has been built within an old agricultural setting.
- 4.2. Wind direction and strength statistics can be seen from the charts below (data taken from the closest monitoring point at Kilgetty approximately 3km to the West. [Wind, waves, weather & tide forecast Kilgetty - Windfinder](#)). The wind data has been used to identify the most 'at risk' receptors in the local area as well as those places such as hospitals, schools etc:

Figure 1--Chart showing the local wind speed and directions:

Monthly wind speed statistics and directions for Kilgetty



5. Sensitive Receptors

- 5.1. A conservative radius of 1km has been used to identify those sensitive receptors most likely to suffer any effects of smoke should a fire occur at site. Anything beyond 1km, with adequate wind dispersal wouldn't be severely impacted by the smoke created.
- 5.2. Hospitals, schools, elderly and care homes have been considered as the most sensitive in accordance with the Fire prevention guidance, residential properties and environmental designations that may also be impacted have been listed separately. The exposure rank has been determined by analysis including receptor sensitivity, distance from the site, direction from the site and the frequency/strength of wind in that direction.
- 5.3. Contact details for the main commercial/industrial receptors are held within the site offices. Residential receptors are too numerous to be held and there are potential issues with gaining details and holding them on site.

Figure 2--Table showing the exposure and risk level for receptors:

Receptor	Direction and distance (m)	Concluded sensitivity	Justification
Receptors within 1km			
Langdon Farm guest house	Southwest @ 520	Low	Relatively distal for air dispersal and not a prevailing wind direction.
Residential Hamlet	Northwest @ 540	Low	Relatively distal and not in the direction of most common winds. Could be families with young children staying at certain times of the year.
Agricultural holding	Northwest @ 800	Low	Significant distance and not a common wind direction.

Bush farm Caravan and camping	Southeast @ 920	Low	Greater distance for dispersal and not within the direction of prevailing winds.
Farm Holding	South @ 620	Low	Relatively distal for air dispersal and not a prevailing wind direction.
Residential holding	Southwest @ 830	Low	Relatively distal for air dispersal and not a prevailing wind direction.
Residential holding	South @ 920	Low	Long distance from site and not a prevailing wind direction.
DCWW treatment works	West @ 80	High	Closest to the site, would be impacted by the smoke in a fire.

Figure 3--Image showing concentric ring distance (m) from the site: 1000



6. Storage of Waste

- 6.1. Materials accepted at the facility do not vary significantly on a daily and weekly basis and so this plan can provide reasonably accurate figures for the storage of wastes at any one time. However actual input figures over each reporting period are made available via waste return submissions to NRW. For detailed procedures on waste acceptance and pre-acceptance checks please refer to the site Environmental Management System.
- 6.2. The following estimates are determined using forecasts based on current activities of the operator. As the waste that is being accepted on to the site is largely the same as that waste that is being received previously; the tonnages will be fundamentally the same. It is important to note that these tonnages are based on the maximum to be stored at any one time safely and do not breach any of the conditions published in the Fire Prevention & Mitigation Plan Guidance document.

6.3. The site estimates that when stored, a safe maximum of (l x w x h):

- 2 stockpiles measuring 4m x 4m x 3m of mixed metal will be stored on site for a maximum of 6 weeks at any one time.
- 1 stockpiles of metal 6m x 6m x 3m including the depolluted ELVs will be stored on site for a maximum of 8 weeks at any one time. ELVs prior to depollution are accepted one at a time and so are delivered directly to the Depollution bay.
- Lead acid batteries are to be stored within a sealed unit or within sealed containers that do not allow for any water to penetrate the unit or, for any liquids to escape.
- Any Gas canisters accepted within the metals are stored in secure and lockable containers away from waste storage.

6.4. The short turnaround of storage time will ensure that the creation of hotspots within the waste piles is significantly reduced.

6.5. It is important to remember that due to the nature of the business and economic aspects that influence waste removal from site; these figures may never be stored on site at any one time. The quantities stored on site will both increase and decrease throughout the year but will not exceed the maximum volumes identified above. The site will comply with the published fire guidance where appropriate as detailed within this plan.

6.6. In the event of a fire on site, the storage and acceptance of waste on site will cease and a contingency site owned by Airfield Metals Ltd (Carew), a family member, will be used for the metal wastes.

7. Quarantined Storage Area

7.1. The quarantine area for the site is designated at the front of the site. An area measuring approximately 5m x 5m will remain empty and only used in the event of a fire. The waste quarantined will be removed as soon as practicable and will be either appropriately disposed of at a suitably permitted site or taken to another recycling facility for further processing.

7.2. The quarantine area has the capacity to hold at least 50% of the largest pile and it has a separation distance of at least 6 metres in all waste facing directions.

8. Stockpile Monitoring

8.1. The management of waste and throughput should be controlled through an effective Environmental Management System (EMS) that is supported by detailed operational procedures put together for the site. In summary however for fire, it is proposed that the FRS will be called if the fire is deemed as being serious and not controllable with the use of on-site equipment. Full cooperation with the FRS and NRW will be provided by any means possible from the site to facilitate an effective outcome from firefighting operations should the need arise.

8.2. All deliveries of material to the reception area are supervised by the site supervisor. Daily checks as well as quarterly waste figure reporting will maintain a tracking system to ensure prolonged stockpiling on site doesn't occur.

8.3. Due to the nature of the waste and the relevant quantities/storage time, thermal monitoring is not deemed to be required. The stockpiles are monitored consistently

throughout the day by several staff employed at the site, after hours, CCTV is used to ensure that the site is secure. Company directors and supervisors are able to access the CCTV after hours.

- 8.4. Site employees live with 15minutes of the site should a fire be detected after hours. All the employees are trained in the use of both firefighting equipment and plant operation so can be called upon to help where required in the emergency response time. Initial firefighting and containment will be the focus until the FRS attend the site to lead the incident command.
- 8.5. Bales of metal waste are stored on site from time to time. The stockpile is created to stand 3 bales high, 5m x 5m (l x w). These are stored on site for just a week at most and are located where a pile of metal has been removed (to bale). If for some reason, the bales are held on site for more than this and are suspected to be of higher risk of starting a fire, the bales will be spilt open to cool and to check the temperatures within. However, due to the quick turnaround, this is not anticipated to be required.

9. Preventing Fires

- 9.1. In addition to the above storage arrangements across the site there are several other processes that could be undertaken to reduce the risk of fires starting on waste sites. The first step is to identify the possible causes of a fire on site and identify how to implement control measures against the causes identified:

Cause of fire	Control measures
Arson/vandalism	A comprehensive and operational CCTV system is in place at the site that can be remotely controlled by the company employees via mobile phone and head office/security staff via computer. The site is fully enclosed by a fence/bund in all areas where public access can be gained.
Self-Combustion	The waste on site is subject to quick turnaround periods and it is not anticipated that the waste will be stored for longer than 8 weeks. Please refer to the section below for more information regarding self-combustion.
Plant/equipment failure	Regular vehicle and equipment maintenance is carried out on all plant/equipment used at the facility. Daily and weekly checks are carried out as routine procedure on site to ensure that everything is in full working order. Any problems that are identified are logged and dealt with as soon as possible.
Smoking materials discarded	There is a strict no smoking policy across all areas of the site where there are waste materials processed, stored or treated. There is a designated smoking area that is away from the waste processing/storage areas.
Hot exhaust system/heat sources	All relevant staff that are trained in the use of the machinery are made aware of the risks that the exhaust system poses with relation to causing a fire. The gaps that are implemented between the waste stockpiles are sufficient to allow for all vehicles to turn without the risk of getting too close to the waste mass. Additionally, the mobile plant on site can be fitted with small fire extinguishers in the event of a small fire caused by the exhaust.
Sparks from loading buckets etc	The risk of this occurring is extremely low. No loading shovel equipment is used.

Electrical Faults	Regular inspections will be undertaken of all electrical installations and equipment. Where required, the electrical kit will be PAT tested and certified by a qualified electrician ensuring electrical safety.
Hot works	Any hot works (cutting, welding etc) will be undertaken away from all stored wastes on site. A sufficient gap will be maintained to lower the risk of sparks igniting any of the material as much as possible. A segregated cutting area has been set up to ensure that sparks from cutting do not reach any stored materials on site.

9.2. There are various safeguards and common-sense measures that have been implemented across the site to help in the reduction of risk:

- Ensure that ignition sources such as heat exchangers, lamps, naked flames, incinerator (if relevant) and dedicated smoking areas are away from waste processing areas. It is recommended that a 6m gap is maintained between them and combustible waste materials.
- A fire watch is to be implemented at the beginning and end of each shift to ensure that all areas of waste storage are inspected, this will be a visual inspection. CCTV will be used after closing to ensure that checks are being made across the site 24-7. Inspections of the build-up of smaller fractions of waste materials around plant will be incorporated into the fire watch.
- All plant and machinery are to be maintained and inspected at regular intervals.
- Regular training sessions will occur every 6 months (or following an incident) in line with current company procedures that will detail FPMP requirements. These are done through toolbox talks which are completed by all employees.
- A dedicated quarantine area has been allocated for emergency waste storage should it be required.
- All fire extinguishers across the site are regularly tested and certified.

10. Site Processes – In a Major Event

10.1. It is important to note that due to the relatively small quantities of waste being stored on site at any one time (detailed above) a major incident is unlikely to occur at the site through spontaneous combustion. However, if in the case that a major incident is being declared, the first action would be to ensure that all staff and contractors are safely evacuated from the site and offices as well as contacting the FRS. The site has a comprehensive CCTV system that can be accessed through mobile phone if out of hours.

10.2. Contingency arrangements, as detailed above, will be made for waste imports so that no more material will be brought on to site until it is deemed acceptable to do so in agreement with the FRS and NRW.

10.3. The plan of action (though this could change in accordance with the FRS requirements as the leading authority on the incident) would be to gain access to the burning materials by whatever means necessary. If required, the waste is to be pulled out from within the area of storage and damped down where it will then be stored in an area designated for quarantine. The damping down of the waste material would be undertaken by the FRS. If

available, the site will also use large storage containers to submerge piles of waste material if required to aid with the damping down.

- 10.4. The plant on site has the capability to move the waste from all areas of the site should it be required. The plant has sealed air-conditioned units with long reach arms. Qualified drivers for all plant on site live within 15 minutes for the site so can be on site quickly if an incident were to take place afterhours.
- 10.5. Controlling fire water will be a priority during a major incident. Tankers will be used to pump any significant pooling/flooding waters away to protect any environmental receptors locally. The FRS will determine that if the re-use of firewater is appropriate on site. The biggest concern would be flooding out of the front of the site as the rear and sides are walled/bunded.
- 10.6. The site has a substantial drainage tank (approx. 30,000l) to hold any initial firefighting water, this could be recirculated if deemed appropriate by the FRS leading officer.
- 10.7. The control of emissions to air is far more difficult for staff at site to control personally. The most effective way to control air emissions during a fire is to put the fire out as quickly and as effectively as possible. Fire curtains can be used to try and limit smoke within the area and so may be an option if appropriate; this is done through discussion with both the FRS and NRW.
- 10.8. If local receptors are being impacted severely by air pollution the operator will seek approval from NRW to use soil or crushed aggregate (if permitted due to the groundwater beneath the site) to suppress the fire and to prevent further air pollution, if possible, as per the recommendations of the guidance.
- 10.9. In all cases and eventualities, the amount of water being used will be minimised where possible. Any unburned material will be excavated and removed from the fire to prevent any further spreading. If some material is too close for this to be practical, some small volumes of water will be sprayed onto the areas to cool them sufficiently. Water jets will be used as little as possible.
- 10.10. When considering the best actions to take on site, full discussions will be had with both the FRS and NRW to ensure that the environment and human health is protected. The scale of the incident, the types of materials in question and the local area/receptors will all be considered before any decisions are made.
- 10.11. All waste that has been subjected to the fire will be stored in accordance with those guidelines detailed within the published Fire Prevention and Mitigation Plan Guidance.
- 10.12. NRW will be informed immediately if any flare-ups do occur within the waste post incident.
- 10.13. The operator can confirm that sufficient financial resources are available if needed during the major incident to cover waste/firewater removal.
- 10.14. Key Points when a fire occurs:
- Raise the alarm and contact the FRS
 - Utilise any on site firefighting techniques if safe to do so
 - If safe (and if applicable), remove any gas cylinders/welding equipment to safe place

- If possible, remove waste adjacent to the material on fire to prevent any spread
- Organise for water tanker support for wastewater removal
- Contingency site to be notified for receiving waste

11. Spontaneous Combustion Risk

11.1. Some materials may spontaneously combust under certain conditions. The risk is greater with certain material types and the risk increases when materials are stored for long periods.

11.2. The materials currently stored on site do not present a significant risk from spontaneous combustion or self-heating when stored for periods of time of less than 3 months. Nevertheless, it is recommended that monitoring of wastes is undertaken on a regular basis. There are several methods that can be employed, but for stacks and piles that conform to the recommendations made in the guidance, a thermal imaging camera or thermal lance would most likely provide the most effective means of monitoring storage for self-heating. However, due to the relatively small quantities of waste being stored on site and for the small amount of time; these requirements are deemed as being unnecessary.

11.3. The following materials should not be stored for longer than 3 months:

- Wood and wood products
- General waste including RDF and fines
- Material that has not been checked for potential hazards before storing e.g. exposed rust that may increase heating (although this is unlikely due to waste acceptance checks on site).

11.4. In the unlikely situation where the facility reaches its maximum storage capacity (as detailed above); waste will cease to be accepted onto site and will be diverted to another facility that is appropriately permitted to store and treat the waste types. Levels of waste on site will be monitored by the site supervisor and company director. Only directors can make the decision to cease waste acceptance as it would have significant financial impacts on the business.

11.5. Where appropriate, the following measures need to be implemented on site:

- Minimise stack size wherever possible.
- Manage stock levels to prevent piles being left for long periods of time.
- Use older material first.
- Keep material in its largest form prior to processing for its end market.

11.6. The material stored on site will not be problematic in so far as self-heating is concerned. As previously detailed, the waste storage time is 8 weeks as a maximum. During this time, the waste material will not be a static stockpile. The metal material will be segregated by type (ferrous, non-ferrous) and so the stockpiles will be both mechanically and manually sorted through. This movement of waste will ensure that the stacks are sufficiently aerated and monitored for signs of heating.

11.7. The ELVs are dealt with and processed one by one and so the risk of prolonged storage is extremely low.

12. Managing Fire Water & Supply

- 12.1. The largest stack of waste (the metal pile), when at capacity on site is approximately 108m³. The Guidance dictates that a rate of 6.6l/min of water for a minimum of 3hrs is required for waste fires. Therefore, for a stockpile of this size, the water requirement of approximately 129m³ (129,664l) would potentially be needed.
- 12.2. For obvious reasons a water storage tank with the ability to store this volume of water on site isn't feasible. There is a fire hydrant that is available and located within 80m of the site boundary. It is important to note that the Fire Service are no longer permitted to test the flow rates of fire hydrants due to the discolouration it causes and the potential to taint water supplies. As such, the exact details regarding the flow rate of the hydrants are unavailable although typically, the average flow rate of fire hydrants in the UK of this size is 1m³/min or 180m³ over the course of 3 hours (conservative figure as size is unknown).
- 12.3. Additionally, the site will hold a small volume of water (30,000l) in the drainage tank storage vessel that will be immediately available to fight a small fire on site. This is a separate tank to the site drainage but is of the same size and design, located next to the drainage outlet. This will also be used, where safe to do so, in the interim period of the emergency call and until the FRS attend site in the event of a major fire. Therefore, the total available water on site is 210m³. However, with the possibility to move burning material to the quarantine area (reducing the stack size) and to use the water collecting in the tank on site to recirculate (30m³), this is deemed as adequate to fight a fire of worst case scenario as the held water across the site and hydrant is 240m³.
- 12.4. In order that fire appliances can move safely and effectively around the site, access roads are provided in accordance with the published guidance document, there are also 2 entry points to the permitted area of the site.
- 12.5. The waste storage area is fenced/bunded all around the perimeter with the lower section having a concrete push-wall. The bottom most edge of the wall has the concrete drain linked to it for water flow. Any fire water in this area will be captured in the site drainage system and, FRS allowing, can be re-circulated and reduce the amount of water being used.
- 12.6. With the above measure in mind, the site is confident that the required water can be accessed to enable effective firefighting.
- 12.7. The site is sealed (with the exception being an area behind the building) so any firewater created on site will be contained within the footprint of the site. Tankering will also be initiated proactively if required to ensure that if water were to pool on site, it would not leave the boundary.
- 12.8. The area behind the building is beyond the concrete but protected by an edging to allow a clear separation and protection from water.
- 12.9. The tanks used for water storage will be filled with clean, fresh water initially and topped up as the same when required. Contaminated water will not be used and stagnation will be avoided by replacing the water every 6-8 weeks and by keeping them out of direct sunlight.

13. Site Access

13.1. Access to the site is acceptable for FRS purposes. The same access roads throughout the industrial estate are used by large vehicles on a regular basis and so are more than sufficient for FRS access.

13.2. Access within the yard can easily be gained directly off the main road that runs to the front of the site. If there were to be a fire at the site; all areas can be easily accessed through the main gates and when inside, towards the rear via 2 other areas on the site.

14. Reviewing

This FPMP is a live working document which is reviewed quarterly or more frequently to reflect any changes to the facility such as the acceptance of additional waste streams (specifically those that are combustible), the modification of infrastructure, the inclusion of additional infrastructure or buildings, the installation of additional plant, machinery or equipment, following a fire incident and/or increasing or decreasing waste volumes. All staff are made aware of the contents and the location of this FPMP during inductions and following a review. It is kept in the Site office and is accessible to all staff, visitors and contractors.

15. During and After an Incident

15.1 Dealing with issues during the fire

During a fire, the material inputs to the site will be cancelled.

Any lorries in transit, will be diverted to another local transfer station, or where possible, be returned to the source site to hold there until business can operate normally again.

To avoid congestion at the site during a major incident, any collections of waste that are booked in for that day will be cancelled. The company director or office manager will arrange for this to be done.

15.2 Notifying residents and businesses

During a major incident the site will notify local businesses and residents via use of social media, local news networks, phone calls to those businesses closest and if required using load speaker.

Information regarding closing of windows and doors along with the likely timeframe of the incident will be communicated after consultation with the Chief Fire Officer for the incident.

15.3 Clearing and decontamination after a fire

There are several elements to clearing and decontaminating the site post fire incident. The first is to ensure that the fire water is tankered off site and taken to an appropriately permitted facility. The site will have to firstly identify whether, and to what extent, the water is contaminated. Part of this assessment will be to identify if POPs are present in the water. This will be done using an MCERTS and UKAS accredited laboratory for the testing of water

chemistry. A full range of contaminants (heavy metals, TPHs, PAHs, POPs) will be tested for as ascertain the most appropriate treatment or disposal route.

The waste that has been impacted by the fire will need to be taken from site. The material will be assessed by the company director and TCM to determine whether any of the waste is recoverable. If not, the material will be sent to landfill as soon as possible.

If required, once the water and waste have been removed from the site, specialist steam cleaning or pressure washing companies will be employed to ensure that the concrete surfaces are free from any chemical contamination resultant from the fire. This would ensure that any residue from the water have been cleaned and would pose no risk to the environment post-incident.

15.4 Making the site operational after a fire

Once the points above have been undertaken in full, the site can focus on re-opening the business. For this to happen, full agreement would be sought from NRW and hopefully a site inspection can be carried out with the local regulatory officer.

Full inspection of the sites critical infrastructure will need to be undertaken prior to the reopening of the facility. The waste facility (those areas impacted by the fire) could need to be checked for integrity by a suitably qualified engineer before any waste storage or treatment will be permitted once more. The infrastructure will need to be serviced and flushed by a professional company that is qualified to both clean the area and remove any water resultant from the fire or created by the cleaning flush. Other key infrastructure such as the CCTV, fire extinguishers and the bowser will need to be checked, although it is not anticipated that these will have been negatively impacted by either the fire or the pooling firewater across the site.

Further equipment checks will also need to be undertaken. Items such as the spill kits (if used) will need to be recharged and signed off as being serviced.

An updated and fully reviewed Fire Prevention and Mitigation Plan would be completed and submitted to NRW for approval.