

The following information has not been supplied in response to the schedule 5 notice and therefore the schedule 5 notice has not been discharged:

Environmental management system

Airfield Metals Limited management system EMS. We require more information on a number of sections of this document.

- *Section 5.3 Site surfacing and drainage – we need further information on what drainage system is in place on site. What operations take place within a building and what surfacing and drainage is in place within the buildings, similarly we require the same information for the outside areas.*

Action: *Please amend this section of the EMS to clearly reflect the drainage and site surfacing on site.*

This site plan submitted as part of the fire plan shows that not all the site is impermeable surface with sealed drainage. There are areas of hard standing and activities being undertaken in a building. The drainage set up of the building/vehicle depollution area has not been discussed and how you will ensure that run off from the areas of impermeable surface and hardstanding will be kept separate have not been discussed. As the site is within a SZP 1 the whole site should be impermeable surface with sealed drainage, there should be no areas of hardstanding these pose a potential risk to the SPZ 1.

Environmental management system

- *Section 6.3 Waste acceptance – in this section you refer to a number of operating procedures these however only relate to end of life vehicles (ELVs). The site is intending to accept more wastes than just ELVs therefore you need to submit waste acceptance procedures for all other waste streams.*
- *6.4 Waste handling and storage – as above this solely relates to ELVs yet the site is accepting other wastes and more detail as to how and where the waste will be stored is needed. This section should address all wastes to be accepted on site.*

Action: *Please amend these sections to reflect all waste streams to be accepted on site.*

This information supplied in respect of this is still predominantly relating to the ELVs and does not adequately address the treatment and waste acceptance of the other wastes to be accepted on site.

Fire prevention and mitigation plan

The Fire prevention and mitigation plan submitted in response to the schedule 5 notice does not meet the guidance "Fire prevention & Mitigation Plan Guidance – Waste Management". The fire prevention and mitigation plan should address all areas of the guidance, if an area does not apply to the site or has been considered and dismissed as an option this needs to be clearly documented in the FPMP.

Site Plan – the following requirements outlined in the guidance have still not been included and are required by the guidance:

- access points around the site perimeter to assist firefighting – see table in guidance for typical FRS vehicle access requirements
- hydrants and water supplies – although they are indicated on the map this is too vague for them to be clearly and quickly located by the fire service in the event of an incident.
- the location of plant, protective clothing and pollution control equipment and materials

- the location of drain covers and any pollution control features such as drain closure valves and firewater containment systems

Common causes of fires and preventative measures – the following have still not been addressed in the FPMP

- Ignition sources
- Batteries within waste deposits
- “Tramp” metal

Storage times and self-combustion factors – the information submitted still does not meet with the requirements of the guidance the following should be considered in detail:

- reduce risk factors (e.g. exposed metal content, proportion of 'fines', mixing of materials and heat generated during treatment)
- minimise stacks sizes (small stacks with appropriate separation are safer than one larger one)
- control moisture levels
- demonstrate good stock rotation for all stored materials and show how this is monitored and implemented daily
- store material in its largest form prior to processing e.g. do not undertake preparatory treatments such as size reduction of green waste unless you are intending on submitting the waste to the treatment process immediately
- monitor and control sub-surface temperature and moisture content with a suitable thermal device (thermal probe/thermal camera) and ensure that this is capable of reaching all parts of a stack (if materials are stored in plastic wrapping you must demonstrate a sampling and testing protocol to ensure a representative number of bales (minimum 10%) are assessed during monitoring)
- routinely turn stacks
- detect and control hotspots within stacks
- define the maximum storage time of all materials on site and show how this will be monitored and controlled
- minimise external heating during hot weather by shading from direct sunlight

Fire detection and fire suppression systems – The information in response to this still does not provide what is required by the guidance visual inspection is suitable but you need to outline why you have discounted the other detection systems suggested within the guidance. Merely stating that from experience the site is able to fight a fire quickly. Consideration need to be made for is a fire was to occur outside of operational hours.

Firefighting Strategy – there is a brief mention of water supplies, separation of unburnt material and smothering of burning materials, however detail is limited, and all other considerations outlined in guidance have not been address/considered. This is still the case you should consider the following when establishing a firefighting strategy:

- (suitable) heavy mobile plant you have available that can be used to move waste around the site, for example loaders, excavators, material handlers
- the use of portable water carriers/bowsers can prove to be an essential mechanism to help extinguish fire effected waste
- adequately trained staff available
- available water supply
- finances available for additional resources

- applying water to cool unburned material and other hazards
- separating unburned material from the fire using appropriate heavy plant
- separating burning material from the fire to quench it with hoses or in pools or tanks of water
- suffocating the fire using soil, sand, crushed brick
- or gravel. However, you can only do this if:
 - Natural Resources Wales has agreed you can do this in the first instance, and
 - you remove and dispose of contaminated material as soon as it is safe to do so

Water supplies - the level of detail surrounding water supplies is not sufficient it is vague and lacks detail. No alternative water sources have been discussed and further information is required on the hydrants. The location of the hydrants is unclear and would potentially hinder the fire service accessing them in an emergency.

Also, the following information should be included in respect of the hydrants:

- evidence that you have permission to use the water supplies stated in your plan from the respective water supplier,
- evidence of the available water pressures to your site to ensure water supplies are available without impacting on local supply, from the respective water supplier,
- dimensions of your largest stack (width, height and length in metres) to calculate the volume in m³,
- calculation of the volume of water that you will require in a worst-case scenario fire incident based on this estimate as a rough guide:
 - A 300m³ stack of combustible material will normally require an average water supply of at least 2,000 litres per minute for a minimum of 3 hours.

As the hydrants were used during the recent fire on site the local fire and rescue service may be able to confirm if the water pressure is sufficient.

Managing fire water –The following aspects of the guidance haven't been considered in sufficient detail and more detailed consideration needs to be applied to the potential risk from the fire to the SPZ1.

- Where is run off going to? If it is to sewer, a written agreement must be in the FPMP from the sewerage undertaker – you've stated it will be going to a blind sump but have given no further information. How will this be emptied? What is the capacity of this sump? Where is any run off from the hardstanding going? In order to protect the SPZ 1 the whole site should be hardstanding any run off of fire water poses a threat to the environment and the SZP 1
- Is there any secondary or tertiary containment?

The below sections were not addressed at all in the first submission of the FPMP. They have either not been addressed at all in the revised FPMP or if they have been addressed they do not meet the requirements of the guidance.

- **Managing Waste Material Stacks and Separation Distances**
- **Baled waste storage** – no information has been given in relation to this. If there will be no baled waste accepted or stored on site this needs to be outlined in the plan.

- **Enclosing stacks using bays and walls** – no information has been given in relation to this. Even if this is not occurring on site it must be outlined in the FPMP that this is the case.
- **Waste stored within a building** – it is indicated that operations will take place in a building, but no further information has been given in relation to this.
- **Waste Stored in containers** - no information has been given in relation to this. Even if this is not occurring on site it must be outlined in the FPMP that this is the case.
- **Layout of waste stacks on site** – The following have not been considered in respect of this section.
 - Location of potential ignition sources on your site
 - Location/s of occupied buildings and high-asset value equipment and plant
 - Escape and evacuation routes around your site and within buildings must not be compromised by stack layout
 - Locations of on or off-site fire hydrants, other water supplies and fire-fighting equipment – you do not want to block access to these with your stack layout
 - Operational practicalities such as movements of vehicles & designated routes
 - Stock rotation requirements, seasonality of supply/off-take etc.
- **Seasonality and waste stack management** – this section has still not been addressed. This should include assessment on the following:
 - provide a technical assessment that shows you have confidence that your proposal will be viable in foreseeable market conditions – this should prove the suitability of materials, the resilience of the supply chain and end user outlets
 - If the materials on your site are subject to seasonal variation in demand and/or supply, you should demonstrate how you intend to manage these variations. You should be able to demonstrate how you will follow the principle of “first in, first out” so that wastes are stored for no longer periods than indicated in Table 1.
- **Monitoring and turning of stacks** – some information has been given but it is very generic. You need to specifically outline how stacks will be monitored and turned. Including information on the following.
 - The staff must be trained to detect and manage hotspots.
 - Piles are monitored regularly, and temperature increases and changes in moisture content are minimised.
 - The equipment used to detect temperature and moisture content must be capable of operating at any depth throughout the pile. If they are proposing to have a stack 4m deep, the probe must be capable of operating the depth of the proposed stack.
 - Explain what indicators will be use in relation to temperature and moisture content and the escalation of actions in relation to these indicators.
- **Designated quarantine area**
 A specific section on the quarantine area has not been provided. This is required and should address all the requirements outlined in the guidance.
 - the location of this area and the volume of waste that it can hold. The location should be a fixed location.

- Does the quarantine area hold at least 50% of the volume of the largest stack?
- Does the quarantine area have a separation distance of at least 6 metres around the quarantined waste?
- **During and after an incident**
Some information has been given in relation this however details are required on all of the following:
 - diverting incoming wastes to alternative sites during a fire
 - having a plan for how you will notify those who may be affected by a fire, such as nearby residents and businesses
 - contractors that might be used to assist with additional plant for firefighting techniques, removal of waste material, containment and removal of excess water run-off
 - how you will clear and decontaminate the site
 - the steps you must take before the site can become operational again
- **Reviewing and Monitoring your Fire Prevention & Mitigation Plan**
You should:
 - outline methods and procedures used to maintain compliance as a separate section within your Fire Prevention and Mitigation Plan?
 - State circumstances that would warrant a review, these could include:
 - Experiencing a fire incident. Following any fire, it is essential that your FPMP (and overall fire management measures) should be reviewed and improved as required to address any issues/concerns
 - Additional combustible waste streams accepted on site.
 - Increase waste volumes accepted.
 - Development of site infrastructure – new buildings.
 - Installation of new equipment or plant – baler/loading shovel/sort-line/trommel
 - described the areas of the FPMP that would need updating because of said circumstances

Action: Please revised the fire prevention and mitigation plan. You need to ensure that all aspects of the “Fire Prevention & Mitigation Plan Guidance – Waste Management” have been considered and addressed within the plan submitted in support of your application. If any of the guidance does not apply to your site or has been discounted as an option for the site, you need to fully outline the reasoning behind this.