

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Mr. N Jones
Airfield Metals Limited
10 Sageston Fields
Sageston
Tenby
SA70 8TQ

Application number: PAN-003025

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 **10/08/18**.

The information requested should be sent to the following address by **23/11/18**.

Information should be sent to:

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

OR

hannah.loughlin@naturalresourceswales.gov.uk

Name	Date
Hannah Loughlin	02/11/18

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 3516

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Correspondence welcomed in Welsh and English

Schedule

Fire prevention and mitigation plan

The Fire prevention and mitigation plan submitted with the application does not meet the guidance “Fire prevention & Mitigation Plan Guidance – Waste Management”.

None of the sections of the guidance have been addressed in sufficient detail and as a minimum you must include information on the following:

- the amount & type of waste received daily and how it is managed
- 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
- the maximum time each type of waste will be stored on site and how it will be managed
- the location within the site where each type of waste will be stored
- the maximum size of any waste pile, stipulating the maximum length, width and depth
- the minimum separation/fire break distance required between all waste/baled waste stacks, and between buildings and waste/baled waste stacks
- a clear area must be established around the perimeter of site, this can vary depending on the layout of your site and permitted stack sizes in accordance with the separation distances as illustrated in Table 2 (this must be available at all times and identified on your site plan)
- the fire prevention techniques used, including management of hotspots (signs of potential self-combustion), monitoring, reporting, recording and actions
- techniques used to minimise the risk of fire spreading within the site or from the site
- the steps and procedures to be followed if a fire occurs on your site
- 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
- contact details of sensitive receptors within 1km of your site –

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- Human receptors include hospitals, nursing homes, schools, residential areas, places of work, transport networks.
- Environmental receptors include 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
- you must include a site plan(s) drawn to scale showing:
 - layout of buildings (including access points, fire exits & location of utilities)
 - areas where hazardous materials are stored (location of gas cylinders, process areas, chemicals, piles of combustible materials, oil & fuel tanks)
 - main access routes for fire engines (typical FRS vehicle access requirements are below) & any alternative access points around the site perimeter to assist fire fighting

Type of FRS appliance	Min width of road (metres)	Min width of gangway (metres)	Min clearance height (metres)	Min weight restriction (tonnes)
Water Tender	3.7	3.2	3.7	12.5
High reach vehicle	3.7	3.2	4.0	24
Weight of vehicle may need to be confirmed with your local FRS as various types of vehicles are in use.				

- Location of hydrants and water supplies
- any watercourse, borehole or well located within or near the site
- areas of natural and unmade ground
- the location of plant, protective clothing and pollution control equipment and materials
- drainage systems, foul and surface water drains, and their direction of flow and outfall points
- the location of drain covers and any pollution control features such as drain closure valves and firewater containment systems
- location of “off- site” emergency information pack with site plan (as specified above)
- location of sensitive receptors within 1km of your site –
- Human receptors include hospitals, nursing homes, schools, residential areas, places of work, transport networks.
- Environmental receptors include source protection zones, surface waters, potable abstractions, groundwater, protected habitats, fisheries
- location of the quarantine area
- assembly point for staff and visitors to site

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- compass rose showing north and the prevailing wind direction

You should also include actions to be taken should a fire occur such as:

- reducing the amount of firewater run-off generated - use sprays and fogs rather than jets
- recycling firewater if it is not hazardous and it is possible to re-use
- applying water to cool unburned material and other hazards, taking care to prevent this water causing or adding to water pollution and/or increasing air pollution
- separating unburned material from the fire using suitable heavy plant
- separating burning material from the fire to quench it with hoses or in pools or tanks of water (this will reduce the amount of firewater produced)
- using soil, sand, crushed brick and/or gravel (if smoke is threatening local communities) to help suppress the fire, although you can only do this when:
 - groundwater vulnerability is low
 - agreed as a part of a firefighting strategy by the FRS and supported by NRW
 - contaminated material is removed and legally disposed of as soon as it is safe to do so

Some information provided in response to the following sections of the guidance but not all the areas outlined for consideration have been addressed, or evidence provided that they have been considered.

Site Plan – a plan is included but this does not include the information outlined in the guidance.

Common causes of fires and preventative measures – the majority of these have been considered but not all. All need to be considered.

Storage times and self-combustion factors – it is stated that the material is combustible but none of the other information outlined in the guidance has been addressed/considered.

Fire detection and fire suppression systems – have outlined what method you will be using but not how/why you have decided on this or why other mechanisms have been discounted.

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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.

Water supplies - the level of detail surrounding water supplies is not sufficient it is vague and lacks detail. Alternative water sources and hydrants are not discussed either.

Managing fire water – the information supplied is limited, more detail is required. All aspects of the guidance must be considered.

No information in relation to the sections of the guidance listed below has been included in the fire prevention and mitigation plan submitted with the application.

- Managing Waste Material Stacks and Separation Distances
- Baled waste storage
- Enclosing stacks using bays and walls
- Waste stored within a building
- Waste Stored in containers
- Layout of waste stacks on site
- Seasonality and waste stack management
- Monitoring and turning of stacks
- Designated quarantine area
- During and after an incident
- Reviewing and Monitoring your Fire Prevention & Mitigation Plan

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.

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.

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

- 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 be accepted on site.

- The EMS does not contain details regarding how the waste will be treated other than the procedure for vehicle depollution.

Action: Please provide details of how and where all wastes will be treated on site.

Waste codes

16 01 04 has been included in the section 6.2 permitted wastes however the descriptor for this waste stream does not meet with WM3 and is out of context for this application.

Action: Please amend all references to this code to reflect the correct descriptor for the code.

Annual throughput.

This has been agreed at 12,050 tonnes per annum. Throughout the supporting documentation the annual throughput is referred to as being 75,000 tonnes.

Action: Please amend all annual throughput references to reflect the agreed annual throughput.

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