

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Company Secretary
Bayliss Recovery Limited
Kilsby & Williams,
Cedar House,
Hazell Drive,
Newport,
Gwent,
NP10 8FY

CC: gareth@environmentalfocus.co.uk

Application number: PAN-002660

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 **19/06/2018**.

The information requested should be sent to the following address by **24/01/19**.

Information should be sent to:

Magda.Leonowicz@naturalresourceswales.gov.uk

Name	Date
Magda Leonowicz	22/01/2019

Authorised on behalf of Natural Resources Wales

Schedule

Fire water containment

You have proposed three methods on how you will contain fire water during and after the event of a fire.

Please provide the below information. If you are proposing these forms of fire water containment you must provide supporting information to demonstrate that your proposals are suitable, practical and effective in containing and managing fire water. These measures must be suitable to prevent firewater going to surface water or soaking to the ground or posing a risk to the environment.

1. The on-site drainage system with an interceptor

In the previous version of the FPMP (version 4) it stated that *'the tankers will be used to pump any significant pooling/ flooding waters away to protect any environmental receptors locally. Any pooling water within the system can be either emptied via a tanker or discharged to foul network in accordance with DCWW agreement.'*

Whilst you have provided confirmation from the sewage undertaker that the fire water may be discharged to foul sewer; during the event of a fire and in the worst-case scenario (i.e. largest stack or un-depolluted ELVS on fire), to ensure the on-site drainage can be used constantly to contain fire water, the fire water will need to be removed to prevent the drainage system from overflowing.

Action:

The FPMP doesn't include information on procedures that will be used to ensure that all fire water is fully contained or procedures to prevent the drainage system from overflowing.

Please provide the following information:

- a) What is the total capacity of the tankers in litres?
- b) If the drainage system overflows, how would the runoff be prevented from escaping the site boundary

Also, in our email to you on 07 December we stated:

'Alternatively, you could submit other proposals to manage and contain fire water runoff. There may be more suitable and effective methods to contain firewater. One alternative measure could be to utilise the interceptor on site to contain firewater, shutting off the interceptor to stop runoff going to soakaway and tankering runoff

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from the interceptor.’ If you proposed this as a containment measure you should consider the following:

- c) the integrity of the interceptor (is this fully sealed)
- d) if there is equipment on site to remove this, if not where will this equipment come, how long will it take to get this equipment on site.

2. Clay bund

You have stated in your FPMP that the ‘*area of concrete would be enclosed with a clay bund to prevent any leached fire water escaping the immediate area and consequently the site*’.

We previously requested you to provide a detailed methodology of using the clay bund (in our email dated 07 December), but unfortunately you have not provided the requested information to support that the clay bund will be effective and will not impede the fire and rescue service during an incident.

Action:

As previously requested, in order to accept the clay bund as an effective means of containing the fire water, we require you to provide evidence demonstrating the following:

a) the clay bund will be of sufficient capacity to accommodate the runoff -we noted that ‘the area would allow for a total volume of 500m³.’ But you haven’t included the following in the most recent version of the FPMP:

- i) the calculations of the amount of water used in the worst- case scenario.
- ii) the calculations of the amount of water the bund would hold. These calculations need to consider the fact that the area enclosed within the bund would be mostly filled with waste material. If the area is filled with the waste material it cannot accommodate the water runoff – this would have to be factored into the evidence, you provide.

b) the evidence the clay bund will be effective in containing the runoff (including preventing it from going to surface water or ground water)

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c) the clay bund is robust enough to withstand the rigors of a fire and subsequent firefighting activity.

d) the methodology should demonstrate that constructing the bund will be realistically achievable.

e) address the resources and skill set required to carry out the task.

f) demonstrate that in fire conditions, the clay bund construction can be undertaken without hampering firefighting activities or putting people at risk and can be completed quickly enough to prevent run off going to surface water or to ground.

g) the amount of clay that will be required to construct a bund or where this will be sourced from. Please note that it would not be suitable to import waste material to do this.

h) measures on how run off will be collected. The FPMP should include what suitable pumping equipment will be available to pump out a 0.5m deep bund.

Normally structures that are provided to perform a specific task (e.g. fire doors) have been tested to a national standard and are certified. They are fitted by a competent tradesman to a pre-determined specification. This isn't available for this suggested solution therefore we require a detailed methodology on how the bund will be constructed addressing the issues previously raised.

3. The foul sewer

Whilst it may be acceptable for fire water to be diverted to foul sewer, you have not provided procedures on how this will be done.

Action:

Please provide the following information:

a) are you proposing to direct runoff from the site to a foul sewer inlet on site, if so please provide

i) the location on the inlet to the foul sewer on an amended site plan.

ii) how the waterflow will be directed to the foul sewer from the site? This should be demonstrated on the site plan and in the FPMP.

b) Or are you proposing to contain all run off using the drainage system, then tankering it off site and then disposing via foul sewer? If so please provide:

i) the procedures, demonstrating how the fire water will be tankered off the site

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