

Mr M Wall  
Natural Resources Wales  
Via email

30 August 2023

Via email

Dear Mr Wall,

### **SRCL Bridgend – PP34430UL – Response to CAR reference NRW0041809**

I refer to your Compliance Assessment Report referred to above, received on the 11 May 2023 in which the following action was made:

- ***SRCL complete the repairs of the impermeable surface at the installation and get hardstanding work certified by a quality auditor to complete improvement condition 8.***

A Purchase Order reference PO30148619, was raised on the 26/06/2023 for the repairs to the hardstanding. We have chased the provider to ascertain when this works will be started. We will provide an update to you once we have received a response.

- ***SRCL to give timeframe for the completion of the firewater retention plans and to detail how the installation prevents water from entering rivers, streams, groundwater and local receptors.***

We have also now completed our procurement process which involved carrying out firewater retention modelling for the facility which include:

- an assessment of the volume of water that needs to be contained.
- review of the existing infrastructure capacity to retain.
- specification of any new infrastructure required to meet the guidance.

The supplier is now developing the final design strategy which is outlined in the section below. On approval of this Improvement Condition the works will be completed within the 12 months.

The same design strategy utilised at other facilities within the group will be adopted. This is based on:

- In the event of a fire, we would initiate the Incident Response Plan for the site. This would include the sealing of the sites drainage system using the penstock valves

---

SRCL Ltd is a Stericycle company.

and attendance of an emergency contractor capable of pumping fire water into tankers for disposal off site.

The retention strategy will enable Stericycle to effectively manage a fire to ensure contaminated fire water is adequately contained and does not enter the surface water sewer, foul water sewer or adjacent land to the site. The strategy has been designed to retain water generated from a worst-case event for two hours.

Key features of the strategy are as follows:

- Installation of penstock valves at each connection point to the Welsh Water managed surface and foul sewer systems to isolate the sites run off.
- Installation of kerbing/bunding to the north of the site to a height considered sufficient to prevent fire water from breaching the infrastructure.
- Surfacing of areas that are currently unmade ground that fall within the flow route of potentially contaminated fire water.
- A capacity to cope with the maximum flow from the fire hydrant infrastructure for a period of two hours coinciding with a worst case one in one-year rainfall event where the on-site underground attenuation is already 50% full.
- Due to the topography of the site a ramp will also be installed at the site entrance/exit to contain waters on the site.

Data used:

- We have confirmed the maximum flow from the fire hydrant infrastructure is 8l/sec. Regardless of how many fire appliances may attend in the event of an emergency, the capacity of this infrastructure would be shared between appliances. Over a two-hour period, this would generate 58 m<sup>3</sup> of water.
- Specialist software has been used to model an extreme rainfall event at a one-year return period for two hours. This generates the volume of 219.47m<sup>3</sup> of potentially contaminated fire water that needs to be retained.

Two Hour Retention Time:

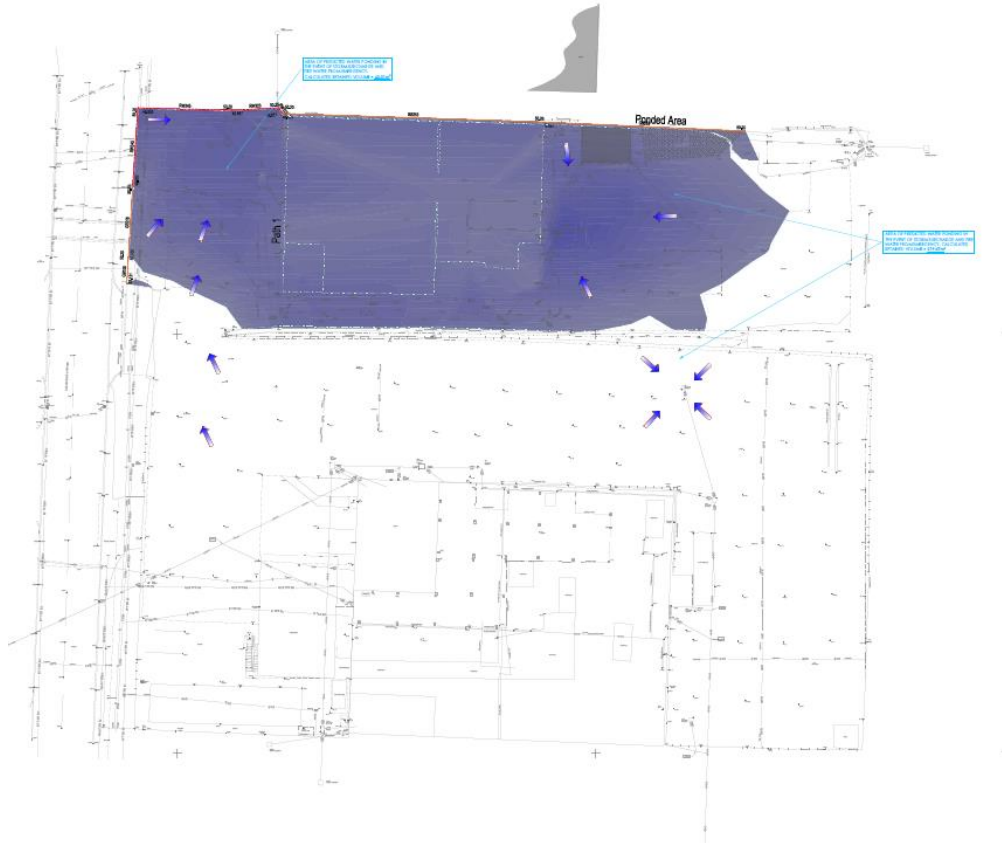
- In the event of a fire, Stericycle would initiate the Incident Response Plan for the site. This would include the sealing of the sites drainage system using the penstock valves and attendance of an emergency contractor capable of pumping fire water into tankers for disposal off site.
- The above strategy provides a two-hour window during the worst-case scenario for the emergency contractor to initiate pumping of firewater off site and maintain capacity of the site's retention infrastructure. Firewater would then be sent for off-site disposal at a licenced facility.

---

SRCL Ltd is a Stericycle company.

Proposed storm and firewater retention plan.

- The area highlighted on the screenshot below shows the area for the above ground containment area for waters produced during the above scenarios when the underground systems are overwhelmed following the complete isolation.



Yours sincerely,

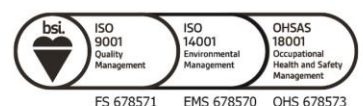


Marianna Hislop  
Permit Compliance Manager

SRCL Ltd is a Stericycle company.

Indigo House • Sussex Avenue • Leeds • LS10 2LF  
T: 0333 240 4400 • [stericycle.co.uk](http://stericycle.co.uk)

SRCL Ltd. Registered in England and Wales No. 3226910  
Registered office: Indigo House, Sussex Avenue, Leeds, LS10 2LF



FS 678571 EMS 678570 OHS 678573