

Permitting Service  
Natural Resources Wales  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

*By e-mail*

13<sup>th</sup> October 2025

Our Ref: 025-2031 WEPA - PAN-026789 Schedule 5 Response-2 REV00

Dear Dr Wallace,

**WEPA UK Ltd – PAN-026789 (EPR/EP3738NG/V006) Schedule 5 Response (2)**

Many thanks for your Schedule 5 dated 26<sup>th</sup> September 2025 (Ref. PAN-026789 Schedule 5 Notice-2). Our responses to the various questions and requests are outlined below.

**NRW 1. Action:** *Provide a revised fire prevention and mitigation plan that address the following;*  
*a) Provide further information on addition measures in place to account for the fact that the site cannot achieve the 6-meter separation distances required. This should include; i. More detail/justification on why 6 meters cannot be achieved.*

The facility has undertaken a full review of the broke and virgin material storage arrangements within the covered tented area. As a result, WEPA has moved the broke materials away from the virgin materials, with the broke now being stored adjacent to the broke transfer conveyor. This movement has two benefits:

- there is now greater than 6 metres between the incoming broke bales and the stored virgin material bales (*i.e.* it now fully complies with the current NRW FPMP Guidance); and
- as the broke bales are now adjacent to the broke conveyor, they are now stored underneath the main canopy, which has integrated temperature monitoring and sprinkler systems (a further FPMP alignment).

The current and proposed locations are outlined below.

### Old Location



**Old Location** – Located centrally within the tent bay. Insufficient space to enable 6 metres of separation with stored virgin materials in the adjacent bay.

The materials stored within the tented area were not covered by the automatic fire detection or fire-fighting systems.

### New Location



**New Location** – Location is adjacent to the broke conveyor located along the edge of the building (i.e. under the canopy).

As the materials are now under the building canopy, they are within the automatic fire detection area and the active fire-fighting system range.

The 6-metre requirement has, therefore, been achieved.

*ii. What additional measures are in place to prevent the spread of fire in the absence of the 6 meters separation distance and how this would provide the same level of prevention, mitigation and time to extinguish a fire (within 4 hours as outlined in the Confederation of Paper Industries Guidance) compared to when a 6 meters separation is present.*

Following a review of storage arrangements, a 6-metre minimum separation gap has been achieved.

*iii. Given that the separation distances are less than the 6 meters outlined, provide additional details on how you manage the cause of fire (section 3 of your FPMP).*

Following a review of storage arrangements, a 6-metre minimum separation gap has been achieved.

*b) Section 8.1.1 outlines that the detection systems do not extend over the tented area. Provide what alternative methods / appropriate measures you have for detection of fire in this area and how this provides the equivalent level of detection to that in other areas of the site.*

Following a review of storage arrangements, a 6-metre minimum separation gap has been achieved. As the materials are now under the building canopy, they are within the automatic fire detection area and the active fire-fighting system range.

The FPMP has also been revised (Ref. 023-1944 WEPA UK Ltd FPMP REV01). A new Section has been added to the FPMP – 8.1.3 Manual Detection Systems. This shall be applied to all non-broke materials stored outside of the automatic detection area. It is also important to note that the area is manned 24/7 and is covered by CCTV.

*c) For the waste acceptance criteria, if a waste load is rejected, what is the maximum time it is kept on site (in the event that it is not sent back immediately).*

No materials can be stored on-site for more than 3 months.

Upon arrival at the site, multiple broke bales are split open and inspected for non-paper materials. If significant non-paper materials are identified, the load would be rejected and reloaded for immediate removal.

*d) Section 3.14 of your fire plan mentioned controls for hot loads but does not provide details on what these controls and what actions are taken. Provide what actions are undertaken in the event that a hot load is identified at site (see Table 5 of the Confederation of Paper Industries Fire Prevention Plan: a paper sector guide).*

Section 3.1.4 of the FPMP has been revised (Ref. 023-1944 WEPA UK Ltd FPMP REV01).

*NRW e) Provide additional details on containment measures for fire water (Section 10 of the submitted fire management plan) i. Penstock - Provide details on the action and timeframes between fire detection and operation of the penstock. This should include but not limited to, time it takes for the penstock be switch to bypass and confirmation if the penstocks are manually operated or not.*

The closure of the penstocks (described within Section 10 of the FPMP) is undertaken manually by the shift technician. We have included the (previously provided) Effluent Treatment Plant System Manual (Ref. ETP Manual - Issue 20), which includes the Standard Procedure for Control of Runoff Waters from a Major Fire at Bridgend Paper Mill.

It would take a person approximately 5 minutes to walk to the penstock area and approximately 1 minute to close and divert the stream.

*NRW ii. Outline how the drainage of waste storage area (Department A) would be able to handle the sudden increase in fire water (at the rate required to extinguish the fire) without causing fire water from leaving department A and entering the environment. This should take into account heavy rainfall.*

The area around Department A and Department B (including the tented storage area) was designed by BHM INGENIEURE (acting as the principal designer). The design incorporates both the overall Fire Protection Systems and the Surface Water Drainage Systems. These are provided as attachments:

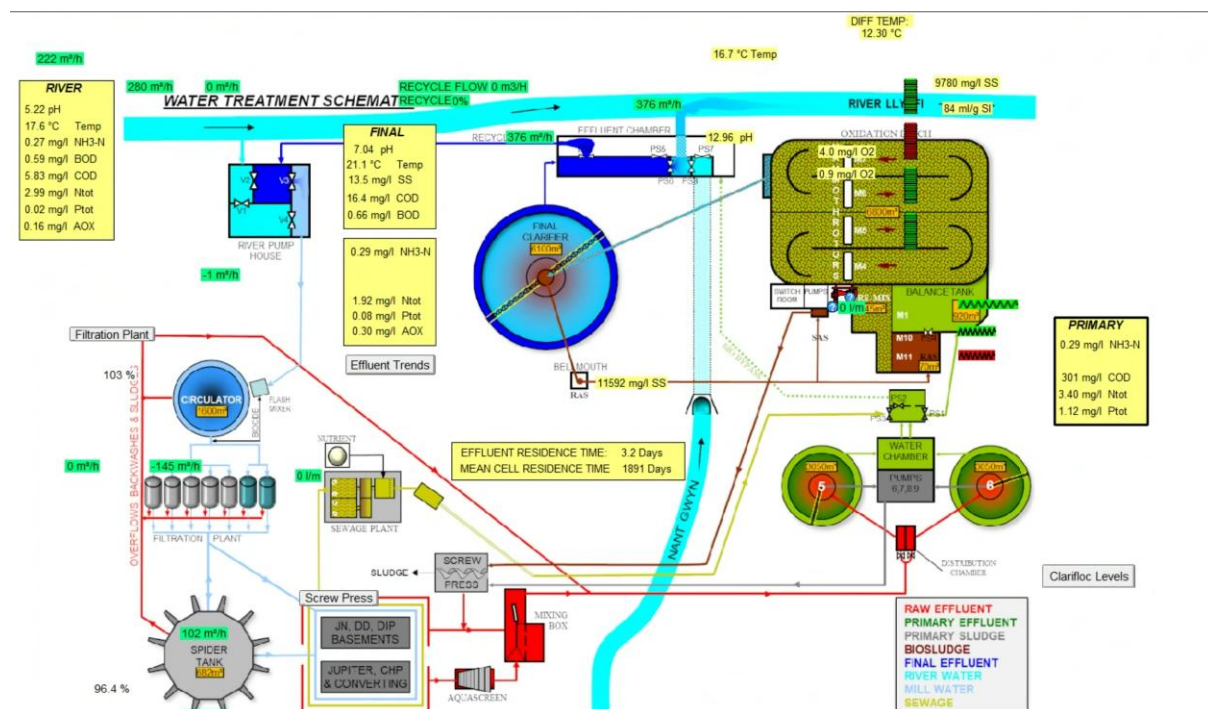
- BHM INGENIEURE (2020). Fire Protection System, GC\_04.02.22\_Tech\_Spec\_Description\_Fire\_Protection\_System, 119003 WEPA UK BRIDGEND
- BHM INGENIEURE (2020). Drainage plans located within the Drainage Management and Maintenance Strategy.

The combined system was designed to handle both fire water and general drainage. The design was approved and signed off by FM Global. The maximum storage volumes are outlined below.

NRW iii. Outline the capacity of each of the stages of the firewater containment and that these stages can handle the volumes required to extinguish the fire.

The primary components of the fire water retention system are:

- Hardstanding (including the c. 1-metre-high bund wall) – a surface area of c. 4500 m<sup>2</sup> (assuming 50% is available, a conservative estimate) to a maximum depth of ½ metre across the pad, conservative estimate) this equates to 1,125 m<sup>3</sup>.
- Attenuation crate – 180 m<sup>3</sup>.
- One of the primary flocculators will always be kept empty and will only be used in an emergency (capacity of 3,050 m<sup>3</sup>) (**Figure 1**).



**Figure 1: WWTP Systems**

The combined total storage is therefore 4,355 m<sup>3</sup>.

The current FPMP guidance provides the following as a suggested guide value:

*A 300 m<sup>3</sup> stack of combustible material will normally require an average water supply of at least 2,000 litres a minute for a minimum of 3 hours.*

This is equivalent (over the 3 hours) to 1.2 m<sup>3</sup> of water per m<sup>3</sup> of stored materials.

The maximum proposed broke storage capacity is 506 tonnes (at a density of 0.75) or 380 m<sup>3</sup> of material. Assuming the NRW application rate/period, this equates to 456 m<sup>3</sup> of firewater (over 3 hours). A conservative estimate shows that there is ample space within the engineered systems.

*NRW iv. How will you ensure there is capacity in the containment system for fire water at all times, even in periods of heavy rainfall.*

Maximum capacity is maintained in the system as follows:

- The hardstanding (not being used for storage) is fully available.
- The attenuation crate is always nominally empty (180 m<sup>3</sup>).
- One of our primary flocculators will always be kept empty and will only be used in an emergency (capacity of 3,050 m<sup>3</sup>).

The combined total storage is therefore 4,355 m<sup>3</sup>. A conservative estimate shows that there is ample space within the engineered systems for firewater and rainwater storage.

*NRW 2. Action: Provide a copy of your waste acceptance procedure and waste acceptance criteria. Reason: These are referenced in the main document and summarised in the FPMP, but we will need to integrate these into the operating techniques within the permit.*

The waste acceptance procedure has been fully incorporated into Table 1-3 within the FPMP (Ref. 023-1944 WEPA UK Ltd FPMP REV01).

*NRW 3. Action: Provide the activity under Annex II of the Waste Framework Directive that applies to the proposed activity to store waste paper (Link here).*

Under Article 3 of *Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste*, recovery and recycling are defined as:

- ‘recovery’ means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II sets out a **non-exhaustive list of recovery operations**;
- ‘recycling’ means any recovery operation by which waste materials are reprocessed into products, materials or substances, whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations;

With regards to the storage of the material that would fall under R13, and the recycling of the wastepaper would fall under R3. These are the most appropriate codes, given that the list is non-exhaustive.

**NRW 4.** Action: State if the use of the waste will result in any changes to noise impact over the existing site (through frequency in lorry deliveries and/or change associated activities on site). If there is an increase risk or change in noise impact, send in a revised the noise impact assessment and/or risk assessment to account for this. Reason: If the use of waste changes the deliveries, this could change the noise impact at the nearest local receptors.

As previously stated, (Ref. 023-1944 WEPA - PAN-026789 Schedule 5 Response REV00, 09/09/25) WEPA corporately has an aspiration to switch from wood-based virgin fibre to recycled fibre (e.g. for sustainability and circular economy reasons). In relation to this permit variation, this is a switch, not an increase in volume, hence there would be no change in impact, *i.e.* no change in vehicle volumes and, therefore, potential noise emissions.

If, in the future, input volumes are subject to change (outside of current permit conditions/limits), this would be subject to assessment and permit variation.

I trust that the above is satisfactory, but if you have any queries on this matter, please do not hesitate to contact me.

Yours sincerely,



**Michael Sylvester**

EAME Manager