

**Notice of request for more information**

Environmental Permitting (England and  
Wales) Regulations 2016

## Notice requiring further information

**To:  
McKenna Waste Limited  
Tynewydd Thornhill Road  
Cwmgwili  
Llanelli  
Wales  
SA14 6PT**

**Application number: PAN-011388**

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 **22/09/2020**.

The information requested should be sent to the following address by

**Information should be sent to:**

[matthew.fryer@naturalresourceswales.gov.uk](mailto:matthew.fryer@naturalresourceswales.gov.uk)

Name	Date
<b>Matthew Fryer</b>	<b>15/01/2021</b>

Authorised on behalf of Natural Resources Wales

# Schedule

## Fire Prevention & Mitigation Plan

The following questions are in regards to the Fire Prevention and Mitigation Plan provided in support of your application which does not meet our guidance.

In the questions below when we say 'Our Guidance' we are referring to Guidance Note 16. Our Fire Prevention & Mitigation Plan Guidance – Waste Management which is available here: <https://naturalresources.wales/media/684379/guidance-note-16-fire-prevention-mitigation-plan-english.pdf>

The questions in this edited, re-issued version of the Schedule 5 notice originally dated 15/01/2021 retain their numbers from the original Schedule 5 documentation. We have however added some additional NRW comments in blue below the questions to provide some further guidance on what is required or where the guidance has not been met.

### *Waste Stored In Containers*

#### **6) Provide a Site Layout Plan that shows the location of each of the skips on site.**

**REASON:** This is required so we can ensure that your proposal meets the requirements outlined in Section 13 Waste Stored In Containers within our guidance. Therefore you need to ensure that the Site Layout (and the FPMP generally) demonstrates how you meet the guidance:

Additional NRW Comments: The FPMP Site Layout Plan (275-01-06.D04) shows the locations of what appears to be 3 skips (metal, wood and mixed waste) and 2 unlabelled containers (assumed based on FPMP as a whole not to be used to store waste, but used to store equipment). Table 2 of the FPMP indicates that you propose a maximum of 10 skips (300m<sup>3</sup>) that could be stored at the site containing the segregated wastes across the waste types accepted at the site. **You have not demonstrated where the remaining 7 skips would be stored and what would be stored in them (we note that not all waste codes applied for would be able to be stored into these skips (e.g. organic waste))**

In addition Table 2 is unclear because it currently suggests you could store up to 10 skips (300m<sup>3</sup>) of each of the different waste types this could be

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interpreted to mean storing 1200m<sup>3</sup> of waste. Based on the rest of the FPMP (Section 4.3) we understand that this is not the intention. However, Table 2 will need to be clearer in its wording and explain the flexibility of storing 10 skips which may comprise of different proportions of the different waste groups without suggesting the site could have up to 40 skips.

**7) Ensure that the FPMP (including the site layout plan referred to by Question 6 above) clearly demonstrates that the containers are accessible so any fire inside can be extinguished.**

**NOTE:** It may also be helpful if you demonstrate through annotation the separation distances between the skips as this will show its accessible. In addition we would expect you to outline how you will practically ensure that the skips are always located in these place (e.g. painted location lines on the ground).

Additional NRW Comment: Although we recognise in section 3.4 of the FPMP you have stated that in skips 'Waste stored in containers must be individually accessible so any fire inside it can be extinguished', as well as 'must not be blocked and the front of skips should remain unobstructed at all times' and finally confirming that the location of skips will be painted on the impermeable pad to ensure these locations remain consistent. You have not demonstrated that the current layout is accessible. Please provide notations confirming the distances between the skips and the nearest obstructions to clearly show the space that the fire and rescue service would have to access the skips should they need to deploy fire fighting techniques insitu.

*Seasonality and waste management*

**9) Update the FPMP to address Section 15 of our guidance.**

**REASON:** Currently your FPMP does not demonstrate how you intend to manage variations (seasonal) in your demand/supply. You also need to demonstrate that you will follow the 'first in first out principles'.

Additional NRW Comment: we recognise the details (Section 3.1) you have provided in regards to the your first in -first our principle. In regards to the anticipated slower turnover in the winter months a stronger/clearer statement is needed in regards to stating that any skips nearing their 3 months will be sent off site regardless of whether they are full or not. This is just to make it crystal clear what the expectation is so it cannot be misunderstood.

Additionally, with an anticipated increase of turnover in the summer months how will waste arrivals be managed as to not leave the site with numerous unsorted mixed skips at the end of the working day? The FPMP says that all waste will be tipped and sorted immediately does this mean there is no onsite 'holding area' for incoming skips which are waiting to be tipped and sorted?

#### Fire detection

#### 10) Your FPMP does not outline the procedures for detecting a fire on site whilst it is in its early stages.

**REASON:** Currently your FPMP does not demonstrate that you have adequate procedures in place to detect a fire whilst it is in its early stages. The Self Combustion point in Section 2 Common Causes of Fires and Preventative Measures does state that *'inspection of materials in skips will be undertaken daily'* however no details are provided:

- How often and when during the day will the inspection be undertaken?
- Who will undertake the inspection? And are they suitably trained to spot early stages of combustion or overheating waste?
- Will the operative undertaking the inspection use any of the fire Detection Systems listed in Section 17 of our guidance to assist them (e.g. thermal probe, or thermal camera)? *Although, using 'Fire Detection System as per Section 17 of our guidance' are not compulsory you should outline within the FPMP how you have considered them and outline how your chosen method of detection is proportionate to the risks on site.*
- What are they looking for? What actions do they trigger if they find waste that is showing signs of combustion/overheating (e.g. smoking or aflame?)

Additional NRW Comment: We recognise the additional information you have provided in section 3.5 which confirms the use of a temperature probe on the twice daily inspections of the skips. **It is unclear how the site manager will use the temperatures identified to make a decision as to whether there is an increased fire risk from waste over heating or combusting.** How will the site manager know if the waste is 'overheating'? Is there a trigger value for the different wastes as to when they would be considered 'over heating'?

Section 3.5 only considers 'extinguishing a fire' identified by the inspection what if the waste is only found to be overheating (not yet combusting)? How will this be managed to prevent combustion starting? Which should be the main goal, preventing the fire in the first place.

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We also need further information outlining how the temperature probe will be used to ascertain the temperature of the entire 30m<sup>3</sup> waste within the skip. E.g. how many locations will be checked for temperature to ensure a representative reading? And how deep into the stockpile will the probe be pushed into?

### *Fire Fighting*

**11) Update the text below the 'Fire Fighting' subheading of Section 3.0 to meet Section 19 of our guidance.**

**REASON:** The language used in the FPMP needs to amend throughout this section. You have used sentences such as '*Heavy mobile plant **which can be used** to move waste around the site, for example excavators. **If heavy, plant is to be utilised in the event of a fire, it must be suitable for the task**, for example by having completely enclosed cabs, fire and heat protected hydraulic systems, etc*' These sentences read like a suggestions they outline what the operator could do, or should consider but do not outline the an actual process/procedure/ commitment in regards to how the operator will act.

You need to consider this for all points listed in Section 19 of our guidance and currently responded to in Section 3 of the FPMP.

Additional NRW Comments: We recognise the additional information you have provided in Section 3.6 regarding heavy plant. Can you confirm the following:

- Whether all, or confirm which, plant has an enclosed cab (at the moment it appears to just be the Volvo ECR84C 5 tonnes mini tracked excavator).
- Whether all, or confirm which, plant has heat protect hydraulics (Kubota 8 tonne tracked excavator and the Telehandler)
- If this is an accurate understanding then can you make it clear in which situations you would use each of the plant taking into account the limitations based on the response to the suitability of each heavy plant. (e.g. if plant doesn't have heatproof hydraulics it wouldn't be located near a flame etc).

### *Water Supplies & Management of Firewater Run-off*

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**12) Update FPMP to demonstrate that you are compliant with Section 20 Water Supplies of our guidance and Section 21 Managing Fire Water Run Off.**

**REASON:** Currently the FPMP does not outline any information regarding the water supply you intend to use in the event of a fire or how you will manage any firefighting water used to extinguish a fire. You cannot allow firefighting water to pollute the environment.

Section 20 of our guidance clearly outlines the quantity of water required for fighting a fire in your largest stack/container this is can be calculated using the following:

*A 300m3 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*

Section 21 of our guidance outlines our requirements in regards to containment of firefighting water. You will need to demonstrate compliance with this.

Additional NRW Comments: We have a couple of queries/concerns in regards to the procedures/resources currently proposed for the sites water supply and control of water runoff.

- 1) **Total water required:** you have correctly identified that our guidance would suggest that you require 200 litres per minute for 3 hours to extinguish the worst case fire at the site. This equates to a total of 36,000L (200L x 180 minutes). You have only provided a maximum of 10,000L stored on site plus additional water of (undefined flow rate from the water supplies on site). We do recognise that you have suggested the water should be able to recirculate. **However can you confirm (with evidence) that this will recirculate quick enough to ensure you have access to enough water for 3 whole hours?** If you are relying on the additional water supplies can you confirm the flow rate of these water supplies and confirm that there would be no knock on impact to local water supply if you use them (as per our guidance for hydrants in section 20 of our FPMP guidance).

**Note:** We will also be consulting with the Fire and Rescue Service (standard practise) and asking about their thoughts in regards to the quantity of water needed given that the majority of waste (with the exception of tipped waste for sorting) will be in the containers.

- 2) **10,000L Storage Tank:** As per point 1 you have suggested that the storage tank will be able to provide 10,000L of water in the event of a fire. If this is the case the tank would always have to be full and ready in the event of a fire. However this tank is also deigned to store potentially contaminated surface water run-off for the site? How will this be managed? It cannot be full for use in the event of a fire AND have capacity

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to store additional water from rain? In addition, if the tank is kept at capacity, and a fire occurs which means you need to utilise additional water from the water supplies on site (as per point 1 above) how will you store the additional run off from the additional water supply?

- 3) Run-off from 'dirty area' of the site:** In the event of a fire where there may be run-off in excess of normal quantities of rainwater run-off can you confirm how you will ensure that all run-off from fire-water activities will not enter the drainage system for 'clean' water and ultimately discharged via interceptor to the environment. .

We cannot allow fire water to be discharged to the environment through an interceptor alone.

Where necessary some examples of typical containment techniques we see in FPMPs include shutting the interceptor to prevent it discharging, or sandbags/inflatable bunds to prevent run-off leaving the dirty area of the site. You will also need to update the sections of the FPMP that deal with decontaminating the site following a fire to consider any measures used here.

#### Quarantine Area

- 13) Update the FPMP to demonstrate that the quarantine area proposed meets Section 22 our guidance in full.**

**REASON:** The language used in the FPMP needs to amend throughout this section. It currently reads like a specification or guidance You have used sentences such as *The quarantine area **should be** within the permitted boundary area of the site **and should be large enough** to both: Hold at least 50% of the volume of the largest waste stream (15m<sup>3</sup>); Have a separation distance of >6 metres around the quarantined waste. The **location of the quarantine area is flexible**, however at least one specified quarantine area clear at all times unless it is being used in the event of a fire.* These sentences read like our guidance they are suggestions they outline what the operator could do, or should consider but do not outline the actual details of the operators arrangements for the quarantine area.

To address Section 22 of our guidance we would expect that you would provide a site layout plan showing the location of the quarantine area. This should show the dimensions of the Quarantine area, and the required 6m separation separation distance around it. We would also expect your FPMP to outline the calculation used to determine the sizing of the Quarantine area and provide a written commentary regarding how this space will be used in the event of a fire.

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Additional NRW Comment : To confirm that 30m<sup>3</sup> an accurate calculation of the largest volume of waste stored on site we will require you to provide dimensions of the 30m<sup>3</sup> skips utilised on site.

### Site Plans

**17) Update the Site plans within the FPMP to ensure that they include all of information/details outlined by Section 5 *Fire Prevent and Mitigation Plan Contents of our guidance.***

**REASON:** The current layout plan in the FPMP does not include the following as required by our guidance:

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

Additional NRW Comment: We make the following comments:

- **‘Areas of natural and made ground’:** it appears that the key on the site plan is labelled the wrong way around as it identifies the area of made, impermeable concrete, as unmade ground and vice versa.
- **the location of drain covers and any pollution control features such as drain closure, and ‘valves and firewater containment systems’:** any items you decide to use in response to Question 10 point 3 would require would need to be shown on the site plan.

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