

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

The Company Director
Bryn Recycling Limited
Gelliargwellt Farm
Gelligaer
Hengoed
CF82 8FY

Application number: PAN-010605

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 **16/07/2020..**

The information requested should be sent to the following address by **24/03/2021**

Information should be sent to:

Matthew.fryer@naturalresourceswales.gov.uk

Name	Date
Matthew Fryer	10/03/2021

Authorised on behalf of Natural Resources Wales

Schedule

1) ACTION: Update the FPMP to address the concerns outlined below in regard to the wood chip storage building.

These comments are result of a response that we received from a consultation with South Wales Fire Rescue Service (SWFRS) and the issues raised will need to be addressed before we are able to complete our assessment of the application.

The assessment we have undertaken to date has assumed that the fire service would be able to engage with a fire should a fire occur anywhere on site. As a result, we anticipated that any fire occurring on in the wood chip storage building would, as per our guidance, be extinguished as fast as possible limiting the environmental impact of the fire.

The SWFRS have confirmed in response to our consultation that with the layout of the waste remaining as it is, in one single 'n' shaped stockpile, that they are unlikely to be able deploy firefighters into the building to assist with extinguishing a fire. It is more likely that they will be limited to outside of the building and based on the specifics of the building it is likely they would opt for a controlled burn. This by its nature means that a fire would not be extinguished as soon as possible, and we must now consider this additional environmental risk.

There are two routes that you could consider when looking to address the concern outlined above.

- **First Option: Adjust the way woodchip is stored in the building to ensure it is in line with our guidance. .**

The fire service confirmed that they are unlikely to deploy firefighters into the building when there is a risk that a fire would spread throughout this stockpile. To address this risk and improve the likelihood they would be able to deploy firefighters into the building and thus be able to help extinguish the fire quickly you should:

- The access in the middle of the 30mx20m stockpile (making it 'n' shaped) should meet the separation and firefighting access requirements provided in Section 8 (including Table 2) of [our guidance](#)
- Use firewalls and bunkers (any use of bunkers will need to meet Section 8, Section 9 and Section 11 of [our guidance](#), specifically in regards to the fire resistance of 120 minutes and the 1m freeboard space) to break up the stockpiles

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- Ensure that there is appropriate separation distance between the open sides of the waste enclosures and another waste face. This should be as per the separation distances in table 2 of [our guidance](#).
- **Second Option: Provide justification and evidence to demonstrate that the risk of a fire occurring within the wood chip storage building is low and what the impact would be should a fire take hold**

A) You need to demonstrate to us with evidence that the likelihood of a large scale fire occurring within the woodchip storage building is minimal. This will need to be evidenced by a robust assessment of the risk by a suitably qualified fire safety engineer.

This should consider, but is not limited to, the following control measures that are within your FPMP:

- Waste type, form and storage times
- Regular waste stockpile temperature monitoring procedure
- Manually operated fire suppression system (sprinkler system) including an assessment of its ability to extinguish a fire. *This should also make clear whether the sprinkler system CAN extinguish a fire before it takes hold or whether it is limited to suppressing a fire (e.g. preventing its spread.)*
- Fire detection camera and alarm
- Lack of ignition sources in the wood chip building

B) In addition, you will need to risk assess the environmental impact of a large scale fire occurring in the building which is not extinguished, allowed through a 'controlled burn' to burn out. This should consider local receptors, both human and environmental and consider all emissions (smoke, odour, noise, and other emissions from a fire or the firefighting activities. Etc).

You will then need to assess whether the overall risk to the environment, considering the likelihood and impact of a large scale fire occurring within the wood storage building, providing justification for your reasoning. We will assess this information on receipt and decide if we agree with your conclusion and if the risk is acceptable.

2. ACTION: Update the FPMP to include a justification for the use of the specific waste temperature monitoring thresholds given in Section 2.3.7 of the FPMP.

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This will need to provide the source of the self-combustion temperatures, and the validity of the temperatures provided.

REASON: We need to be comfortable that these threshold values are appropriate and will ensure that they prevent self-combustion. The South Wales Fire Service were not able to provide us with confirmation related to these values. We therefore need to ask you for more details on how you selected the given self-combustion temperatures for the relevant waste types (wood, wood chip and compost (oversize, and finished product))

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