

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: The Company Secretary
Orthios Feedstock (Anglesey) Limited
The Moorings
Rowton Bridge
Christleton
Chester
CH3 7AE

Application number: PAN-011274

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 19th August 2020. The information requested should be sent to the following address by 3rd May 2021.

Information should be sent to:

Llinos.Owen@naturalresourceswales.gov.uk

Name	Date
Llinos Owen	12th April 2021

Authorised on behalf of Natural Resources Wales

Ebost/Email Llinos.Owen@cyfoethnaturiolcymru.gov.uk
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Gwasanaeth Trwyddedu Cymru, Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP
Wales Permitting Service, Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

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www.naturalresourceswales.gov.uk Correspondence welcomed in Welsh and English

Schedule

1. With regards to your Fire Prevention and Mitigation Plan, submitted as part of your application:
 - a) You have included contact numbers for nearby residents/receptors, but the Plan does not state that these residents/receptors will be informed in the event of a fire. Please update your Plan to include measures that will be used to raise the alarm and to inform local residents/receptors in the event of a serious fire.
 - b) Table 1 of your Plan lists 'leaks and spillages of oils and fuels' as a common cause of fire. You state that oils and fuels used on site as part of the treatment process are stored away from the waste storage. You have also included a section on 'Oil and fuel storage' in your list of general fire prevention measures (page 16). However, Table 3 of your Plan states that no flammable and/or hazardous substances shall be kept on site. Please clarify and update one of your site plans to include the location of oil and fuel tanks if appropriate.
 - c) Please update one of your site plans to include drainage systems, foul and surface water drains, and their direction of flow and outfall points.
 - d) Information is required as to how responders can access the 'emergency information pack' out of operating hours. Please update your Plan to include this information.
 - e) With regards to actions to be taken should a fire occur, consider whether the following are applicable to your site:
 - Reducing the amount of firewater run-off generated using sprays and fogs rather than jets
 - Recycling firewater if it's not hazardous and it's possible to reuse – provide details of capacity, location of deepest points, filtering, on-site facilities etc. Note that if the area identified for recirculation of

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firewater is near the penstock valve area then access would be an issue for Fire Service personnel and vehicles.

- Separating burning material from the fire to quench it with hoses or in pools or tanks of water
- Using soil, sand, crushed brick and/or gravel to help suppress the fire

The above may be applicable to your site if groundwater vulnerability is low and contaminated material is removed and legally disposed of as soon as it is safe to do so. Please update your Plan to show that the above have been considered.

- f) With regards to fire prevention principles, please update your Plan to demonstrate that you have considered adopting the following, if applicable:
- Reduce risk factors (e.g. exposed metal content, proportion of 'fines', mixing of materials and heat generated during treatment)
 - Control moisture levels
 - Minimise external heating during hot weather by shading from direct sunlight
- g) With regards to baled waste storage, please update your Plan to demonstrate how you have considered the following:
- What sampling and testing protocol you will use to make sure you assess a representative number of bales (minimum 10%) during monitoring
 - How you will get representative temperature readings from the centre of the bales; and from bales within the centre of each stack pile
 - If baled waste did exceed maximum storage durations, any additional measures, such as breaking and rewrapping bales, and additional fire risks from such measures, e.g. sudden introduction of oxygen

- h) Can you confirm that methods used to install bays and walls are in line with the manufacturers recommended installation requirements? Clarity is required on the construction methods employed for the stack shelters which will each have 3 sides and a roof. Details as to fire resistance and ventilation arrangements are also required. Please update your Plan to include this information. As far as any fire safety installations are concerned then there should be carried out by competent persons to the necessary standards of B.S. or equivalent.
- i) Please update your Plan to demonstrate:
- How calculation of flame height and radiation has been taken into account in preventing the spread of fire between piles
 - Prevention of bridging across or around walls
 - How a 'freeboard' space at the top and sides of the walls will always be physically retained in accordance with the latest available guidance. From your application it seems that freeboards are maintained above the stacks but not around the edges. Please clarify.
 - The frequency and method of turning piles
- j) Please update your Plan to provide more information about the proposed internal layout of the building and the processing of materials once in there. Is the large internal open space shown on the plan only going to be used for vehicular movements?
- k) If appropriate, please update your Plan to show how you have considered the proximity and location of any infrastructure which may be affected by a fire, such as overhead power lines, major roads, rails lines etc.
- l) You have detailed the procedure for rejecting loads etc. within the 'Operating Techniques' section of your Supporting Information document. This procedure should be replicated in your Fire Prevention and Mitigation Plan for clarity on what will happen to incoming wastes during a fire.

- m) Please update your Plan to show how you have considered staffing numbers. A proportion of the staff members would need to be trained to deal with emergencies. Will you need contractors to assist with additional plant, e.g. for firefighting techniques?
- n) Please update your Plan to specify how you will clear and decontaminate the site following a fire, and the steps that you will take to become operational again.
- o) We have been advised by the Fire Service that you had previously contacted them regarding hydrant testing on site. However, there aren't any hydrants shown on the plan. Should there be?
- p) The reservoir referred to on page 18 of your Plan does not appear to be shown on the aerial view supplied. Please update your Plan to provide further detail regarding its construction, seasonal level variation, hard standing weight capacity, access arrangements and stability of its sides to ensure the safety of appliances and personnel who would need to use it.
- q) There is mention within your application of a tank below the building. Does this contain water or would it if there was a spill?
- r) It is confirmed within your Plan that 120 minute fire resistant bays will be constructed but there is no mention of the proposed building material or how fire spread between bays has been mitigated. Please update your Plan to clarify.
- s) Are there any interceptors on or near the site or does all drainage rely on the penstock arrangement?
- t) Please update your Plan to provide further information on the ULAS scheme referred to on page 17.
- u) Your Plan's risk assessment indicated that gas cylinders will not be accepted. Please explain how loads from household wastes will be monitored to ensure this.

- v) Does the bund wall referred to as being 250mm in height surround the entire installation and is it sound and impervious?
- w) Roll-out booms are referred to as part of the containment strategy. Will these be available on site with staff trained in their use? Please update your Plan to clarify.
- x) No reference has been made to any form of heating equipment on site. Please can you confirm that this is not an item that needs considering within your Fire Plan?
- y) The highest risk levels are deemed to be the ones that will be experienced when the existing product is processed given the extended time it has been stored within the A frame building. This situation could be compounded if the nature and composition of the content is unknown. This initial work may be worthy of an enhanced fire risk assessment which may dictate a requirement for enhanced staffing numbers and fire suppression equipment. Please explain how you will give extra consideration to this initial work.

For easy reference, please highlight updated areas of your Fire Prevention and Mitigation Plan prior to submission and/or give reference to the page of the Plan where the above comments/concerns have been addressed.