

**APPLICATION FOR AN ENVIRONMENTAL PERMIT  
UNDER THE ENVIRONMENTAL PERMITTING  
(ENGLAND AND WALES) REGULATIONS 2016  
(AS AMENDED)**

**FIRE PREVENTION PLAN**



**MINERS PARK, LLAY INDUSTRIAL ESTATE,  
LLAY, WREXHAM**

**ECL Ref: ECL.088.01.01/FPP  
Version: Issue 1  
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## ACRONYMS / TERMS USED IN THIS REPORT

<b>AONB</b>	<b>Area of Outstanding Natural Beauty</b>
<b>BGS</b>	<b>British Geological Survey</b>
<b>CCTV</b>	<b>Closed Circuit Television</b>
<b>DSEAR</b>	<b>Dangerous Substances and Explosive Atmospheres Regulations 2002</b>
<b>EA</b>	<b>Environment Agency</b>
<b>ECL</b>	<b>Environmental Compliance Limited</b>
<b>EMS</b>	<b>Environmental Management System</b>
<b>EP Regulations</b>	<b>Environmental Permitting (England and Wales) Regulation 2016 as amended</b>
<b>EP</b>	<b>Environmental Permit</b>
<b>EWC</b>	<b>European Waste Codes</b>
<b>FPP</b>	<b>Fire Prevention Plan</b>
<b>FRA</b>	<b>Fire Risk Assessment</b>
<b>FRS</b>	<b>Fire Rescue Service</b>
<b>FWM</b>	<b>Forward Waste Management Limited</b>
<b>IBC</b>	<b>Intermediate Bulk Container</b>
<b>LNR</b>	<b>Local Nature Reserve</b>
<b>MAGIC</b>	<b>Multi-Agency Geographical Information for the Countryside</b>
<b>MOT</b>	<b>Ministry of Transport</b>
<b>NGR</b>	<b>National Grid Reference</b>
<b>NNR</b>	<b>National Nature Reserve</b>
<b>NRW</b>	<b>Natural Resources Wales</b>
<b>NVZ</b>	<b>Nitrate Vulnerable Zone</b>
<b>OS</b>	<b>Ordnance Survey</b>
<b>PAT</b>	<b>Portable Appliance Testing</b>
<b>PPMR</b>	<b>Planned Preventative Maintenance Regime</b>
<b>SPZ</b>	<b>Source Protection Zone</b>
<b>SSSI</b>	<b>Sites of Special Scientific Interest</b>
<b>The Facility</b>	<b>Platts Agriculture Limited, Miners Park Waste Treatment Facility</b>

## 1. INTRODUCTION

### 1.1. Overview of the Fire Prevention Plan

- 1.1.1. Environmental Compliance Limited (“ECL”) has been appointed by Platts Agriculture Limited (“Platts”) to produce a Fire Prevention Plan (“FPP”) to form part of the Environmental Permit (“EP”) application to undertake a bespoke waste operation at their site, hereafter referred to as “the Facility” located on Miners Park, Llay Industrial Estate, Llay, Wrexham, LL12 0PJ.
- 1.1.2. Platts is proposing to operate a waste wood processing facility accepting 60,000 tonnes per annum of non-hazardous waste wood.
- 1.1.3. As per Natural Resources Wales’ (“NRW”) Fire Prevention and Mitigation Plan guidance<sup>1</sup>, a FPP is a requirement of the Permit application as Platts propose to store wood and wood composites which are defined by NRW as combustible waste materials.
- 1.1.4. The FPP guidance is applicable to the storage of wood waste at the Facility, however, for completeness, the finished product has also been considered.
- 1.1.5. This FPP document follows NRW’s FPP guidance and details the required mitigation and management methods to prevent a fire of combustible materials stored at the Facility. This FPP identifies measures to be employed to reduce the likelihood of fires at the Facility. In addition, the plan identifies measures to be employed in the event of a fire in order to minimise the pollution caused to the environment or harm to human health.
- 1.1.6. Under current fire safety legislation<sup>2</sup>, a responsible person must carry out, or appoint a competent person to carry out, a suitable and sufficient assessment of the risks of fire to employees and others who may be affected by the site. A Fire Risk Assessment (“FRA”) will be carried out on an annual basis or in the event of a change to operations on site. Any findings and recommendations identified during the FRA will be included in the FPP during the scheduled FPP reviews.

### 1.2. The Applicant

- 1.2.1. Platts Agriculture Limited, formerly named R.A. and C.E Platt Limited, formed in 1973 and is a market leading UK manufacturer and supplier of quality animal bedding.

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<sup>1</sup> NRW’s ‘Fire Prevention and Mitigation Plan Guidance – Waste Management’, Version 2.0, Dated August 2017. Accessed April 2021.

<sup>2</sup> Regulatory Reform (Fire Safety) Order 2005, available at: <http://www.legislation.gov.uk/ukxi/2005/1541/contents/made> and associated guidance note available at: <https://www.gov.uk/government/publications/regulatory-reform-fire-safety-order-2005-guidance-note-enforcement>, accessed April 2021.

## 2. THE SITE

### 2.1. Site Location

- 2.1.1. The Facility is located on Miners Road and within Llay Industrial Estate which consists of industrial and commercial units surrounded predominately by rural land use. The Facility is centred on Ordinance Survey (“OS”) National Grid Reference (“NGR”) 332077 356370. The Facility will occupy an area of approximately 1.56Ha.
- 2.1.2. The exact location of the Facility and the proposed Environmental Permit Boundary (outlined in green) is indicated on the Site Location Plan (Drawing ECL.088.01.01-01), which is contained in Appendix I.
- 2.1.3. Access to the Facility is via Miners Park leading off Miners Road and Davy Way. Miners Road and Davy Way connect to B5373 which links to the A483 main road network. The wider site setting and road network are illustrated on the Site Location Plan (Drawing ECL.088.01.01-01).
- 2.1.4. The closest Fire Station is North Wales Fire and Rescue Services Ambulance and Fire Services Resource Centre, which is located on Croesnewydd Road, Wrexham, LI13 7YU. The Fire Station is approximately 6km south of the Environmental Permit boundary with the site access road wide enough to accommodate fire engines and no height restrictions in place to enter the site.
- 2.1.5. The Facility benefits from a perimeter security fence with barbed wire, lockable entrance gates, security lighting and intruder alarm system. It is proposed that the operations will be 24/7, therefore, Platts personnel will be in attendance at the Facility at all times, with the exception of shutdowns or Bank Holidays. All access doors are locked out of working hours and only a limited number of employees possess access keys in order to restrict unauthorised access into the Facility. The Facility is covered by closed circuit television (“CCTV”) which is monitored by senior management. Key members of staff are also on call to attend site out of hours if required.

### 2.2. Sensitive Receptors

- 2.2.1. A summary of the immediate environmental site setting is provided in Table 1 below and the potential sensitive receptors within a 1km radius of the proposed Environmental Permit boundary are shown on the Sensitive Receptors Plan (Drawing Reference ECL.088.01.01-03.), which is provided in Appendix I.

**Table 1: Summary of Surrounding Land Uses**

Boundary	Description
North	Commercial/industrial units and farmland
East	Commercial/industrial units
South	Commercial/industrial units and farmland
West	Rural land use/farmland

2.2.2. A review of the area using the Multi-Agency Governmental Information for the Countryside (“MAGIC”) mapping tool<sup>3</sup> and Lle Geo Portal for Wales<sup>4</sup> indicates that Llay Bog is located within 1km of the Facility’s EP boundary and is designated as a Site of Special Scientific Interest (“SSSI”). Alyn Waters Country Park is also located within 1km of the EP boundary and is designated a Local Nature Reserve (“LNR”).

2.2.3. The Ancient and Semi Natural Woodlands located within 1km of the EP boundary are listed in Table 2 below.

**Table 2: Ancient and Semi Natural Woodlands within 1km of the Environmental Permit Boundary**

Description	Centre Point		Nearest Point	Direction
	Easting	Northing	Distance from EP Boundary (km)	
Ancient Semi Natural Woodland	331476	356814	0.64	NW
Ancient Semi Natural Woodland	331249	356358	0.67	W
Ancient Semi Natural Woodland	331646	355183	0.71	SW
Llay Bog Ancient Semi Natural Woodland	332181	355406	0.83	S
Ancient Semi Natural Woodland	331194	355946	0.84	SW
Restored Ancient Woodland	331196	355950	0.90	SW
Restored Ancient Woodland	331153	357007	0.98	NW

2.2.4. Additionally, a Nitrate Vulnerable Zone (“NVZ”) is located 0.61km west of the proposed EP boundary.

2.2.5. Searches conducted on the Lle Geo Portal for Wales indicate that none of the following sensitive land uses are located within 1km of the EP Boundary:

- National Nature Reserves;
- Areas of Outstanding Natural Beauty;
- Source Protection Zones; or
- National Parks

2.2.6. A Wind-Rose showing the local meteorological conditions is shown in Figure 1. The information is based on annual historical data from the Hawarden Airport Meteorological Station and demonstrates a South Easterly prevailing wind direction.

<sup>3</sup> Department for Environment, Food and Rural Affairs (“DEFRA”) MAGIC Online Mapping Tool, available at: <https://magic.defra.gov.uk/magicmap.aspx>, accessed April 2021.

<sup>4</sup> Lle Geo-Portal for Wales Mapping Tool, available at: <https://lle.gov.wales/catalogue?t=1&lang=en>, accessed April 2021.

**Figure 1: Wind-Rose of the Local Meteorological Conditions**

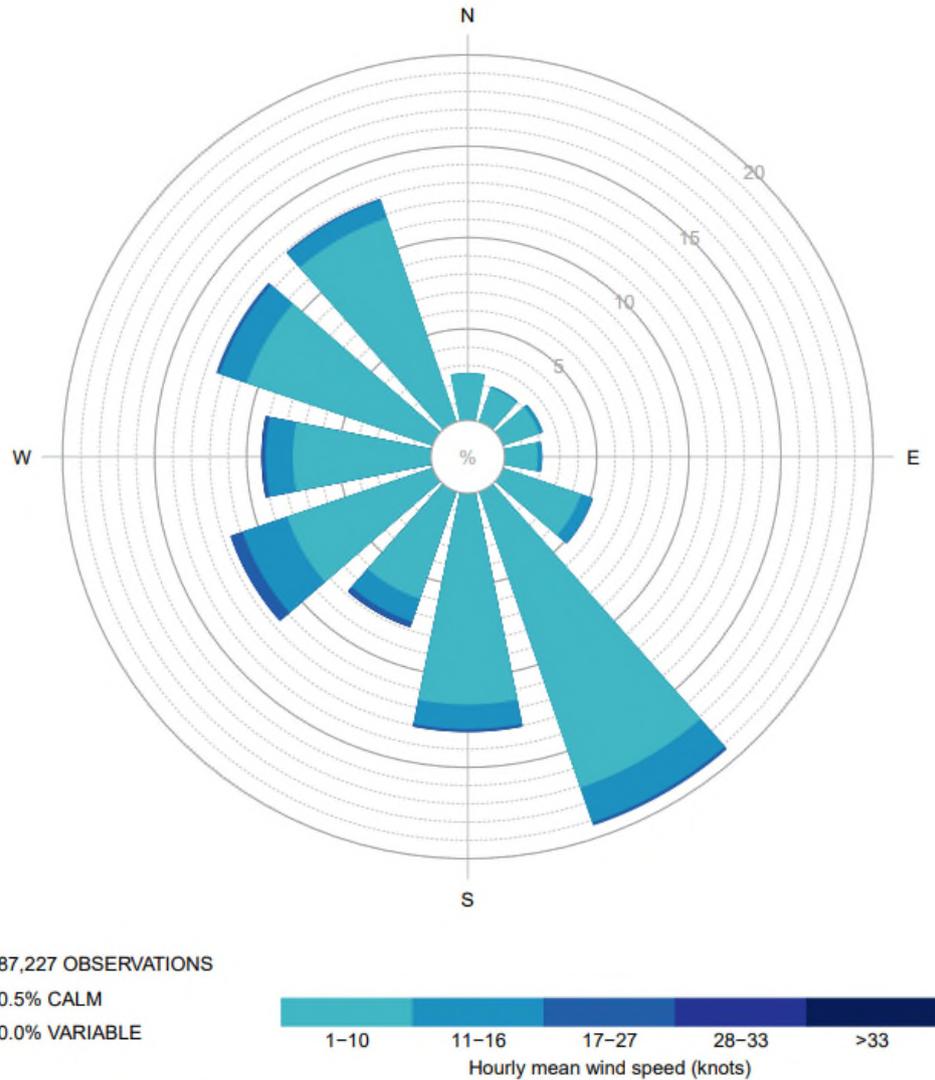


**Met Office**

**HOURLY MEAN WIND ROSE FOR  
HAWARDEN AIRPORT**

NGR: 3342 E 3647 N  
SEASON: ANNUAL

ALTITUDE: 11 metres AMSL  
Period of data: Jan 2010 – Dec 2019



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## 2.3. Geology

2.3.1. The British Geological Survey (“BGS”)<sup>5</sup> records the underlying superficial geology as Till, Devensian formed up to 2 million years ago in the Quaternary Period. These sedimentary deposits are glaciogenic in origin.

<sup>5</sup> British Geological Survey Geology of Britain Viewer. Available online at <http://mapapps.bgs.ac.uk/geologyofbritain/home.html?>, accessed April 2021.

- 2.3.2. The bedrock is recorded to be the Salop Formation – mudstone, sandstone and conglomerate. This sedimentary bedrock is fluvial in origin and formed approximately 272 to 310 million years ago in the Permian and Carboniferous Periods.

## **2.4. Hydrogeology and Surface Water**

- 2.4.1. There are a number of small ponds located in the surrounding area. However, the nearest major waterbody is the Alyn River located approximately 0.68km west of the proposed EP boundary.
- 2.4.2. The bedrock geology is reported to be a ‘Secondary A’ Aquifer, defined by the Environment Agency (“EA”) as permeable layers capable of supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classed as minor aquifers.
- 2.4.3. Superficial deposits underlying the Facility are designated as undifferentiated secondary aquifer. This designation is assigned in cases where it has not been possible to attribute either category A or B to a rock type. In most cases, this means that the layer in question has previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type. The superficial aquifer is reported to be of low groundwater vulnerability.
- 2.4.4. According to the Lle Geo-Portal for Wales, the Facility is not located on a Source Protection Zone (“SPZ”).

## **2.5. Flooding**

- 2.5.1. As shown on the Long-Term Flood Risk Maps available on the Lle Geo-Portal for Wales<sup>6</sup>, the Facility is located within an area categorised as possessing very low flood risk from rivers and seas and surface water. Very low risk is defined by NRW as having less than 0.1% of flooding.

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<sup>6</sup> Lle Geo-Portal for Wales Long Term Flood Risk Maps, available at: <https://naturalresources.wales/evidence-and-data/maps/long-term-flood-risk/?lang=en>, accessed April 2021.

### 3. SITE ACTIVITIES

#### 3.1. Proposed Waste Activities

3.1.1. Platts propose to undertake one Specified Waste Operation as follows:

- storage of non-hazardous waste wood with treatment limited to pulverising and removal of wood dust from clean wood waste for use as animal bedding material and, pulverising of treated wood waste to produce wood dust for use as a cubicle conditioner within the agricultural livestock sector.

3.1.2. Platts propose to accept 60,000 tonnes of non-hazardous wood waste per annum at the Facility.

3.1.3. Consequently, the waste management operations to be carried out at the Facility as specified in Annex I and Annex II of the Waste Framework Directive 2008 are detailed below:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes); and
- **R13:** Storage pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

3.1.4. In the event of a fire, the following emissions would be anticipated:

- combustion gases released to atmosphere, these would be relatively short lived and would not cause any significant adverse environmental effects; and
- potentially contaminated firewater on impermeable concrete immediately surrounding the source of the fire where the firewater would be applied.

#### 3.2. Waste Acceptance

3.2.1. Platts will put in place a fully documented incoming waste acceptance procedure at the Facility, the primary purpose of which is confirm that the characteristics of the incoming waste matches the information provided at the pre-acceptance stage.

3.2.2. The waste will be collected from the waste provider and transported to the Facility in Platt's own trailers, during which time, the waste will be under the control of Platt's trained drivers. On collection from the waste provider, Platt's drivers will undertake checks to ensure the waste corresponds to the information provided at the pre-acceptance stage to ensure only conforming waste is transported to the Facility.

3.2.3. On arrival at the Facility, the trailers will be checked to ensure they are in good condition and the waste has been transported correctly. The trailers will then be weighed and issued with waste acceptance paperwork and the following information will be recorded:

- weight;
- date of arrival on-site;
- time;
- original producers' details (or unique identifier); and
- unique reference number.

- 3.2.4. Waste will only be accepted when there is sufficient capacity within the Facility and a clear defined method of recovery has been determined.
- 3.2.5. All documents are checked by the Environmental Department prior to the waste being accepted.
- 3.2.6. Each delivery will have been visually checked on collection from the waste provider and under the control of Platt's own drivers during transport. A further inspection will be undertaken during the unloading of the wood waste when further checks for non-conforming waste will take place in the enclosed trailer unloading bay prior to waste processing.
- 3.2.6.1. Waste delivered to the Facility must be accompanied by a written description of the waste describing its composition and information specifying the original waste producer and process where required.
- 3.2.6.2. Platts will develop a procedure containing clear and unambiguous criteria for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance.
- 3.2.6.3. Non-conforming waste is described as any waste that:
- the Facility is not authorised to accept;
  - is not recorded on the accompanying waste documentation; or
  - would not be expected, for any other reason, to be present.
- 3.2.7. Any non-conforming waste observed will be removed off site and sent back to the supplier as soon as practically possible, however, such waste will only be stored in the Non-Conforming Waste Quarantine Bay for a maximum of 5 working days.
- 3.2.8. The Quarantine Area is shown on the Site Layout Plan (Drawing ECL.088.01.01-02) contained in Appendix I. Non-conforming wastes will be stored within the Quarantine Area on impermeable concrete in the external yard.
- 3.2.9. The supplier will be contacted without delay to inform them of the non-conforming waste and identify measures that can be implemented to prevent recurrence. NRW will also be informed as soon as practicable in the event of waste being rejected. Due to the extensive sampling regime to be implemented at part of the proposed activities, the risk of acceptance of non-conforming waste is considered low.
- 3.2.10. Back-up copies of electronic records will be maintained off site at Platts Head Office on Miners Road in Llay Industrial Estate.

### **3.3. Waste Handling, Storage, Processing and Dispatch**

- 3.3.1. On arrival into site, vehicles will be required to report to the weighbridge and site office for waste acceptance. Once the load has been accepted and weighed, the waste will remain within the sealed trailer which will be moved to the dedicated site area for Full Trailers of Unprocessed Material as shown on the Site Layout Plan (ECL.088.01.01-02) contained in Appendix I.

- 3.3.2. Waste storage arrangements are also shown on the Fire Prevention and Mitigation Plan (Drawing ECL.088.01.01-04) contained in Appendix I.
- 3.3.3. Waste treatment at the Facility will be limited to pulverising to produce wood dust as described in Section 3.1.
  - 3.3.3.1. All waste received at the Facility will be treated on a first in first out basis and will be stored for a maximum of five working days before processing.
- 3.3.4. The finished product will be removed from the Facility within three months.
- 3.3.5. The finished product will be packaged in plastic wrap before being palletised in the external yard or will be stored within trailers. All finished product will be removed from the Facility within enclosed trailers.
- 3.3.6. All finished product will be weighed prior to being removed from the Facility. This will be achieved by the vehicles being weighed prior to loading and then prior to departure carrying such waste over the weighbridge.

### 3.4. Waste Quantities and Storage Arrangements

- 3.4.1. Wastes will not be accepted unless the Facility is adequately resourced to receive the waste.
- 3.4.2. The waste storage arrangements including quantities on site stored at any one time are provided in Table 3 below. The finished product is also provided for completeness.

**Table 3: Waste Quantities and Storage Arrangements**

Type	Site Location (Refer to Site Layout Plan ECL.088.01.01-02)	Storage Arrangements	Maximum Pile Size (m <sup>3</sup> ) Stored on Site At Any One Time	Maximum Total Quantity (tonnes) Stored on Site At Any One Time
Unprocessed Wood Waste	Full Trailers - Unprocessed Material	Trailer	One Trailer – 4.2m (l) x 2.55m (w) x 3m (h) = <b>32.13</b>	1 Trailer – 28 tonnes <b>20 Trailers</b> <b>Total = 560</b> <b>tonnes</b>
		Trailer	One Trailer – 4.2m (l) x 2.55m (w) x 3m (h) = <b>32.13</b>	1 Trailer – 28 tonnes <b>12 Trailers</b> <b>Total =336</b> <b>tonnes</b>
Processed Material/ Finished Product	Baled Processed Material/ Finished Product	Baled on pallets in dedicated bays and within dedicated storage area	Dedicated Storage Area = <b>472.5</b> (187 pallets) 11 x Storage Bays = <b>210</b> (880 pallets)	1 bale – 0.025 tonnes 55 bales per pallet = 1.38 tonnes <b>Total = 1,472</b> <b>tonnes</b>

- 3.4.3. The unprocessed wood waste material and the processed finished product stored within enclosed Platt's owned trailers will be easily accessible so any fire inside can be extinguished. Platts have their own fleet of vehicles and will be able to move the trailers as soon as is reasonably practicable in a safe manner to prevent the fire spreading.
- 3.4.4. The total amount of combustible material stored on site at any one time will not exceed 2,368 tonnes.
- 3.4.5. The maximum time unprocessed waste will be stored on site is one month, however, the aim is to process and export as soon as practicably possible.

### **3.5. Fire Prevention Plan – Quarantine Area**

- 3.5.1. The Quarantine Area will be used in the event of a fire on site and will be kept clear at all times. The Quarantine Area will have moveable cones and a floor marker so that it can be easily located and to inform vehicles not to restrict access to this area.
- 3.5.2. All staff will be trained in the location and use of the Quarantine Area to ensure that waste can be transported to this area as soon as possible or at most within 1 hour of the fire starting. The training will include practice exercises stimulating a fire event in which staff will be required to move waste to the Quarantine Area in an emergency situation.
- 3.5.3. The location of the Quarantine Area is identified on the Fire Prevention and Mitigation Plan (Drawing ECL.088.01.01-04) and can be used to place burning wastes to extinguish them or to move unburnt wastes into the quarantine area to isolate and prevent them catching fire.
- 3.5.4. The Quarantine Area has a storage capacity of 254m<sup>3</sup> (i.e. 11m x 11m x 2.1m) which is capable of holding 50% of the volume of the largest pile (finished product) (i.e. 472.5m<sup>3</sup>/2 = 236m<sup>3</sup>) and benefits from a separation distance of 6 metres around the quarantined waste and a fire wall on the Permit boundary. The separation distance is clearly shown as grey hatching on the Fire Prevention and Mitigation Plan (Drawing ECL.088.01.01-04).

## 4. POTENTIAL SOURCES OF FIRE RISK

### 4.1. Common Causes of Fire

4.1.1. As per NRW's FPP guidance, the following potential sources of fire risk have been identified, based on the hypothetical scenario of the absence of any risk management measures and strategies being employed:

- **Arson:** Industrial Estates and factories can commonly be affected by arson; a serious issue as the ensuing fire can easily spread to another unit.
- **Plant or Equipment Failure:** When not properly maintained and inspected, plant and equipment can pose a serious fire hazard. This is particularly true of mechanical equipment, due to the potential for friction to develop between moving parts of the equipment.
- **Electrical Faults (including damaged or exposed electrical cables):** Faulty electrics and non-compliant electrics are one of the most common causes for fires in the workplace. The main hazards include wiring not meeting the relevant standards, exposed wiring, overloaded circuits and power outlets, extension cords, and static discharge. All of these have the potential to generate a spark, which has the potential to act as an ignition source.
- **Discarded smoking materials:** Smoking materials have the potential to ignite a fire if they come into contact with flammable or combustible materials.
- **Hot works:** Hot works, commonly including welding and torch cutting, have the potential to cause a fire as a result of the sparks and molten material which are generated during their operation. These can become hot, and could ignite a fire if they come into direct contact with flammable/combustible materials.
- **Industrial heaters:** Industrial Heaters can become a potential fire hazard if a fault develops, allowing issues such as over-heating to develop within the device. This hazard is worsened by the heaters being left turned on and unattended.
- **Plant and Hot exhausts:** The settling of dust on hot exhausts and hot engine parts can cause a fire as a result of the heating up of the materials. This could become a hazard both during operation and post-operation.
- **Ignition sources:** Other ignition source such as naked flames must be kept away from combustible or flammable materials.
- **Leaks and spillages of oils and fuels:** Oils and fuels are flammable (and potentially explosive), therefore if they leak or are spilled within the site boundary, they are liable to present a risk of fire should an ignition source interact with it.
- **Build-up of loose combustible waste, dust and fluff:** Loose combustible waste creates more opportunity for interaction with potential ignition sources, increasing the likelihood of a fire starting.
- **Reaction between wastes:** If incompatible wastes are stored together, they have the potential to react and potentially lead to a hazardous situation. Common outcomes of the mixing of hazardous wastes include heat generation, flammable gas generation, explosions, or fire.
- **Self-Combustion:** This occurs by an increase in temperature due to exothermic internal reactions within the waste piles, followed by thermal runaway due to chemical oxidation, rapidly accelerating to high temperatures and auto ignition.

## 5. PREVENTION MEASURES

5.1. Table 4 below provides a summary of the associated preventative measures as per NRW's FPP guidance.

**Table 4: Preventative Measures**

Cause	Preventative Measures
Pile Sizes/Volumes and Dimensions	<ul style="list-style-type: none"> <li>• Markers will be drawn onto bay walls/floors to indicate approximate maximum stockpile sizes. The maximum length of the pile stored at the site will be 10m for piles that are accessible from only one side and 15m for piles accessible from four sides.</li> <li>• Fireproof concrete block bay walls are to be constructed to store waste piles. Platts has chosen the product and design based on the requirement to achieve a fire resistance period of 120 minutes to allow waste to be isolated to stop fire spreading and minimise radiant heat.</li> <li>• The maximum height of finished product stored externally and not within enclosed trailers at the Facility will not exceed 2.1m. The maximum height of the bay walls will be 3.1m to provide a 1m freeboard between the height of the waste pile and bay wall.</li> </ul>
Arson and Vandalism	<ul style="list-style-type: none"> <li>• The entire Facility benefits from a perimeter fence with barbed wire and lockable entrance gates.</li> <li>• All access doors will be locked when unattended and only a limited number of employees possess access keys in order to restrict unauthorised access into the Facility.</li> <li>• The Facility is covered by CCTV which is monitored by site personnel.</li> <li>• The site infrastructure, including the site security measures will be inspected monthly and maintained and repaired as required to ensure their continued integrity. Any repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;</li> <li>• A visitor sign-in system will be in place. In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented. This will be recorded in the Site Diary; and</li> <li>• Records will be maintained and will include inspections and maintenance of security fencing and doors, breaches of security, investigations and actions taken.</li> </ul>
Storage Duration	<ul style="list-style-type: none"> <li>• Unprocessed waste will be stored no longer than one month. However, Platts will aim to process the incoming material within 5 days and arrange for its export off site as soon as practically possible to minimise over-stocking which in-turn minimises the risk of overheating and spontaneous combustion.</li> <li>• Waste will be recorded and processed in date order;</li> <li>• A waste tracking system will be implemented which will enable the storage durations to be checked and monitored on a weekly basis by the Site Manager; and</li> <li>• There are no seasonal variations in opening times.</li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventative Measures
Training (Cont.)	<ul style="list-style-type: none"> <li>• Training will be provided to all site personnel in relation to how to prevent fires on site, how to identify fire risks and how to spot fires on site. Nominated personnel will also receive training on the safe use of fire extinguishers by a specialist third party fire consultant.</li> <li>• Site management will ensure that there is always a sufficient number of staff on site when the site is operational;</li> <li>• All staff and contractors will be made aware and understand the contents of the FPP and the procedures that are in place to be followed in the event to a fire on site. This familiarisation training will be undertaken as part of the company's induction process and staff will be required to provide a signature to confirm and record that they have read and understood the contents of the FPP and associated procedures;</li> <li>• A fire drill will be held annually to simulate the processes which would be undertaken in the event of a fire. It involves creating a situation which replicates what would happen if a real fire were to occur, with the inclusion of fire alarms and requires the employees, contractors and visitors to evacuate; and</li> <li>• The drill enables familiarisation of the FPP and ensures the quickest and safest exit routes are used. Findings from the drill will be discussed and an action plan to address any opportunities for improvement will be implemented if necessary.</li> </ul>
Employee Awareness	<ul style="list-style-type: none"> <li>• Employees will be aware of:               <ul style="list-style-type: none"> <li>○ the actions to be taken on discovery of fire and on hearing a fire alarm;</li> <li>○ the location of manual fire alarm call points within the building and the method of operation;</li> <li>○ the location of firefighting equipment within the building and the method of operation;</li> <li>○ all escape routes within the building;</li> <li>○ the purpose of fire resisting doors and their location within the building; and</li> <li>○ evacuation procedures for the building and the location of the assembly point.</li> </ul> </li> <li>• All employees will be aware of the methods of fire prevention as detailed below:               <ul style="list-style-type: none"> <li>○ should an employee consider that something or someone presents a fire risk within the building, they will report the matter to the Site Manager;</li> <li>○ employees will not allow the accumulation of large amounts of combustible materials around workplaces or escape routes;</li> <li>○ employees will not obstruct fire escapes; fire exits or any fire-related equipment;</li> <li>○ employees will ensure that self-closing fire/smoke doors are not wedged in the open position;</li> <li>○ employees will observe the smoking policy for the site; and</li> <li>○ employees will maintain as best as possible a clear desktop policy to prevent the rapid spread of fire should it occur.</li> </ul> </li> </ul>
Monitoring	<ul style="list-style-type: none"> <li>• Due to waste being dry , therefore preventing microbiological activity to occur within the waste thereby raising the temperature, it is unlikely that hot spots will occur within the waste in the enclosed trailers.</li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventative Measures
Monitoring (Cont.)	<ul style="list-style-type: none"> <li>• Site operatives will undergo training on the management of stockpiles, including, recognising hot spots within stockpiles and managing hotspots. Unprocessed wood waste will remain in the trailer for no longer than 5 days and finished product pallets will not be stacked in order to allow air flow and prevent hot spots developing.</li> <li>• In order to ensure waste piles are sufficiently rotated and waste storage time is minimised, site operatives will ensure that the oldest materials is processed first. The finished product packaging is marked externally with the date to ensure the three month maximum timeframe is not exceeded.</li> <li>• Stockpiles will be visually inspected throughout the day and where appropriate findings logged within the Site Diary at the start and end of each working day as a minimum.</li> </ul>
Actions to Limit Self-Heating	<ul style="list-style-type: none"> <li>• Effective stock management limits the likelihood of the self-combustion of materials stored on site. As such, the operator has waste acceptance and stock management procedures which are followed by all employees at the site.</li> <li>• Stockpiles of unprocessed waste and finished product will be managed as follows, to minimise self-combustion:               <ul style="list-style-type: none"> <li>○ Stockpile volume, height and storage times will be minimised on site and hence stored materials will be rotated whilst held on site; and</li> <li>○ where possible and practicable, material is stored in its largest form prior to processing.</li> </ul> </li> <li>• Wherever possible, the following measures will be implemented on site to reduce self-combustion:               <ul style="list-style-type: none"> <li>○ separation of materials;</li> <li>○ isolation of combustible materials; and</li> <li>○ restricting storage times.</li> </ul> </li> </ul>
Plant and Equipment	<ul style="list-style-type: none"> <li>• Site plant/vehicles will be kept to a minimum.</li> <li>• Site plant will be fitted with fire extinguishers and dust filters.</li> <li>• A number of measures will be implemented at the site to prevent fuel and combustible liquids leaking or trailing from site vehicles. These will include:               <ul style="list-style-type: none"> <li>○ Site vehicles subject to annual servicing and maintenance checks;</li> <li>○ Daily checks, such as evidence of obvious leaks, hydraulic fluid levels, operating systems, undertaken on site vehicles prior to use;</li> <li>○ A procedure for reporting any faults or maintenance concerns to prevent any foreseeable breakdowns or leaks;</li> <li>○ A procedure for immediate reporting of fuel leaks or spillages;</li> <li>○ In the unlikely event of a fuel leak, spill kits will be deployed to clean up any fuel spillage and prevent entry to the onsite. As part of the Site's Environmental Management System ("EMS"), staff will be trained in emergency response procedures, including the deployment and appropriate disposal of spill kits.</li> <li>○ Any delivery vehicle allowed entry onto site must be serviced and Ministry of Transport ("MOT") road worthy.</li> <li>○ Any evidence of leaks from these vehicles will be recorded and communicated. Further entry to site will be refused until repairs have been made.</li> </ul> </li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventative Measures
Plant and Equipment (Cont.)	<ul style="list-style-type: none"> <li>• Operatives will be required to complete inspection for all equipment on a daily basis. Inspection will be undertaken to check for faults and ensure appropriate safeguards are in place. The inspections will be recorded in the Site Diary.</li> <li>• All plant and equipment will be operated, maintained and serviced in line with manufacturer’s recommendations and instructions. Instruction Manuals for plant and equipment will be held on site.</li> <li>• Induction training and refresher training will be provided to staff in the safe operation of plant and equipment relevant to their role, in accordance with the EMS.</li> <li>• The Planned, Preventative Maintenance Regime (“PPMR”) for site plant and equipment is provided in Appendix II and will also be displayed in the site office and records of all servicing and maintenance will be stored within the site office.</li> <li>• Plant and equipment will be visually inspected to ensure it is fit for purpose.</li> <li>• If required, plant will be subject to blow down at the end of the day to remove any dust or fluff accumulations from waste processing operations. A check will be undertaken to ensure that each blowdown has been carried out and a record maintained of these checks.</li> <li>• In the event of a failure or suspected fault with an item of plant or piece of equipment, the operator will ensure that the equipment is shut off in a safe manner and not used until the equipment can be repaired or replaced.</li> </ul>
Infrastructure and Site Inspections	<ul style="list-style-type: none"> <li>• Operational areas of the site and equipment will be cleaned down during each working day to reduce the build-up of waste or dust.</li> <li>• The site will undergo daily housekeeping inspections and infrastructure inspections on a monthly basis as part of Platts’ EMS.</li> </ul>
Electrical Faults	<ul style="list-style-type: none"> <li>• Regular safety checks and daily site inspections will be recorded in the site diary/wall planners;</li> <li>• All buildings electrics will be fully certified by a qualified electrician;</li> <li>• Employees are not permitted to bring their own electrical items into the work environment;</li> <li>• Annual Portable Appliance Testing (“PAT”) testing of any portable electrical appliances will be carried out. This includes third party contractor electrical equipment which must be PAT tested prior to being used on site.</li> </ul>
Ignition Sources	<ul style="list-style-type: none"> <li>• Sources of ignition will be kept at least 6 metres away from combustible and flammable materials. Sources of ignition will be minimal.</li> <li>• If used, a safe use policy for portable heaters will be in place which states; <ul style="list-style-type: none"> <li>— the use of such heaters will be kept to a minimum;</li> <li>— staff will be fully trained in their use;</li> <li>— they will undergo PAT every 12 months to ensure the safety and compliance of equipment;</li> <li>— they will be placed at a safe distance from any flammable material;</li> <li>— they will not be covered by any material or clothing items; and</li> <li>— will be turned off and unplugged when unattended.</li> </ul> </li> <li>• a no smoking policy will be in effect in all operational areas and this will be communicated to all staff and visitors with signage and training.</li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventative Measures
Heat and Spark Prevention	<ul style="list-style-type: none"> <li>• No burning, reactive/reacting or visibly hot (producing steam or heat) loads will be accepted on site. Loads will be visually inspected on collection at the producer site and during tipping for processing to ensure compatibility with accompanying delivery notes, therefore minimising prohibited wastes. In the very unlikely event that a hot load is identified, it would be rejected and immediately returned to the supplier. If this is not possible, the hot load would be moved to the Quarantine Area benefiting from a separation distance of 6m and the waste will be removed as soon as practically possible. The waste supplier will be contacted, and evidence of preventative action taken will need to be provided prior to any subsequent waste being accepted at the Facility from the waste supplier.</li> <li>• Hot works will be undertaken within the temporary building at the Facility. Any hot works/use of cutting tools will be carried out indoors and at a safe distance from combustible materials. The site will operate a Permit to Work/Risk Assessment system to control high risk activities, such as hot works. Only a Competent Person, one that is adequately trained and experienced, is authorised to undertake the welding and cutting on site. The control and preventative measures stipulated on the Permit to Work/Risk Assessment will be rigorously followed by the Competent Person and the other members of the team. The area will be made safe before the work starts and all the prescribed preventative precautions will be taken whilst the work is in progress.</li> <li>• On completion of the hot work, the area will be cleared and checked. The competent person or deputy will re-visit the work area, after a suitable period of time. This will be undertaken one hour after the activity has ceased and at the end of the working day. This is known as a fire-watch and ensures no signs of smouldering embers or hot surfaces are evident which could potentially cause a fire. An example of the blank Job Specific Risk Assessment /Permit to Work which will be completed is provided in Appendix III. At regular intervals during working day, as well as at the end of the working day, a fire watch will be carried out.</li> <li>• Vehicles will be turned off when not in use. A fire watch will be undertaken at regular intervals throughout the working day to detect signs of fire caused by dust settling on hot exhausts and engine parts. Special consideration will be given to the high-risk time which is the hour after the plant/machinery has been switched off when dust can settle on hot exhausts. A fire watch will carry out visual checks. Additionally, vehicles will be given time to cool down and the final fire watch will be undertaken at the end of the working day prior to staff leaving site.</li> <li>• Flammable/combustible materials will be stored in designated areas away from frequent vehicle movements;</li> <li>• Due to the limited storage time of the waste, temperature of materials within the site does not require checking, however, if advised by the Fire Rescue Service (“FRS”), thermometers will be installed on site to monitor heat. Moisture level testing of the material will be undertaken as moisture is a key aspect related to pathogens and mould formation. Moisture content will be less than 30% by weight.</li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventative Measures
Gas Bottles and Other Flammable Items	<ul style="list-style-type: none"> <li>Through the implementation of robust waste acceptance procedures (See Section 3.2), waste gas cylinders will not be accepted on site.</li> <li>Gas cylinders related to the hot works will be stored securely within the temporary building within a dedicated locked gas storage cage.</li> </ul>
Smoke/Heat/Flame Detectors	<ul style="list-style-type: none"> <li>A Fire Alarm System has been installed on site and hence the Facility has smoke detectors fitted throughout the site buildings. The locations of the fire alarm system call points are provided on the Fire Prevention and Mitigation Plan – Buildings (Drawing ECL.088.01.01-05) contained in Appendix I.</li> <li>The Fire Alarm System will be monitored when the site is not attended and Senior Management will attend site immediately to assist the FRS and ensure the FPP is adhered to.</li> <li>The Fire Alarm System will be tested weekly and serviced in accordance with the manufacturer’s recommendations. Records of the tests, servicing and any false alarms will be kept in the Site Diary.</li> <li>The fire extinguishers at the Facility are described in detail in Section 6.3. – ‘Containing and Mitigating Fires’.</li> <li>A GreCon Spark Detection System has been installed within the chippers where pulverisation takes place and floods the chipper system if it becomes activated.</li> </ul>
Reactions between incompatible materials	<ul style="list-style-type: none"> <li>Strict waste pre-acceptance and acceptance procedures will be implemented on site to ensure only the permitted waste types are accepted.</li> <li>All loads will be pre-booked and covered by appropriate waste documentation. Employees are under instruction to reject the load if incoming waste or materials have been identified which have not been previously agreed and stated on the waste documentation.</li> <li>Only experienced Platts personnel will be responsible for undertaking pre acceptance checks/ acceptance checks and allocating the waste to the correct designated waste storage area. As a result, any incoming waste or material has been pre-inspected and determined and therefore, incompatible waste and material will not be stored together under any circumstances.</li> </ul>
Explosion	<ul style="list-style-type: none"> <li>Due to the presence of sawdust, the processing area is covered by ATEX European Directives (Directive 99/92/EC – ATEX 137 and Directive 94/9/EC – ATEX 95) and only appropriately ‘Ex’ rated equipment is used;</li> <li>A Dangerous Substances and Explosive Atmospheres Regulations 2002 (“DSEAR”) risk assessment is undertaken by a qualified person to zone the process areas;</li> <li>an annual site inspection takes place to ensure equipment meets the right specification for that zone and is conducted by a qualified ATEX company; and</li> <li>Any findings are actioned and documented.</li> </ul>

## **6. FIRE MANAGEMENT AND IMPACT REDUCTION**

### **6.1. Waste Acceptance**

6.1.1. Strict waste acceptance procedures detailed in Section 3.2. of this FPP are strictly adhered to at the Facility.

### **6.2. Site Infrastructure**

6.2.1. The Facility will consist of impermeable concrete hardstanding surfacing and will include:

- a weighbridge;
- site office;
- a factory building including unloading bays, a packaging area, and size reduction machinery;
- an external yard area comprising segregated storage of unprocessed material and finished product;
- a temporary building used for fabrication works; and
- vehicle washing area.

6.2.2. All site surface runoff (i.e. rainwater) from the Facility will enter the drainage system which ultimately connects into the foul sewer network. Any potentially polluting spillages at the Facility which could potentially enter the drainage system will be subject to the Facility's robust spill management procedure, which would prevent such an occurrence.

6.2.3. The Facility layout, infrastructure and drainage arrangements are displayed on the Site Layout Plan (Drawing ECL.088.01.01-02) and Drainage Plan (Drawing ECL.088.01.01-06) contained in Appendix I of this FPP.

6.2.4. Fire exit doors are an important part of a building's fire defences. The two functions of a fire door are:

- to compartment the building to prevent the spread of fire; and
- to provide a safe means of escape for those persons evacuating the building.

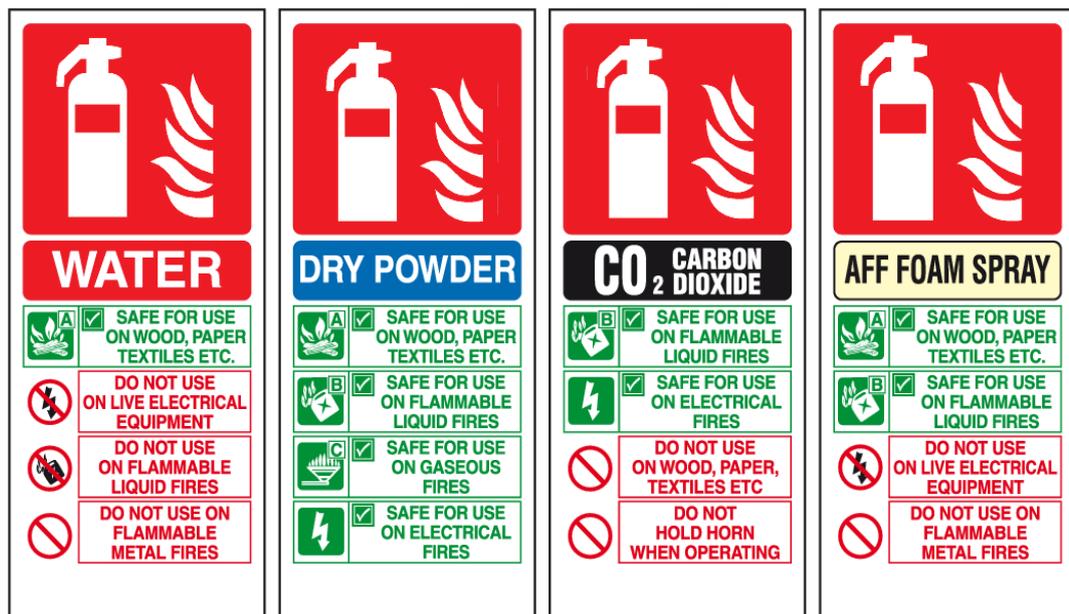
6.2.5. All employees will ensure that all fire doors are kept shut at all times. All fire doors are shown on the Fire Prevention and Mitigation Plan – Buildings (Drawing ECL.088.01.01-05) which is contained in Appendix I.

6.2.6. The fire alarm system on site consists of certified automated system with call points located throughout the buildings. The locations of the call points are also shown on the Fire Prevention and Mitigation Plan – Buildings (Drawing ECL.088.01.01-05).

### 6.3. Containing and Mitigating Fires

6.3.1. The Facility will have water, powder, foam, and carbon dioxide fire extinguishers. The type and associated application are shown in Figure 2. The locations of the fire extinguishers are shown on the Fire Prevention and Mitigation Plan – Buildings (Drawing ECL.088.01.01-05) contained in Appendix I. The fire extinguishers are maintained by a specialist third party accredited company and therefore covered by an appropriate UKAS-accredited third-party certification scheme. All fire extinguishers will conform to BS 5306 Part 8 and serviced as part of an annual inspection contract. Nominated Platts personnel will be trained in the safe use of the fire extinguishers by the specialist third party accredited company.

Figure 2: Fire Extinguisher Type and Application



6.3.2. An up-to-date site plan will be on display in the Site Office and will detail:

- site layout;
- main access route;
- waste storage arrangements;
- firefighting equipment locations;
- fire detection equipment locations; and
- PPE and fire containment measure locations.

6.3.3. The main access route to the Facility for fire engines is via Miners Park road. The width of this road is approximately 7m wide to accommodate heavy goods vehicles (“HGVs”) travelling daily to and from industrial units within the Llay Industrial Estate. It should be noted that there are no height restrictions on the access road or on entry to the Facility. The site entrance gates can be fully opened to approximately 5.5m. It can be confirmed that the main access route and entry point satisfy the stipulated dimensions provided in NRW’s FPP guidance document.

6.3.4. In addition, all plans, procedures and drawings relating to emergency scenario response including this FPP document and associated drawings will be held in the site office.

## 6.4. Site Procedures

6.4.1. The following procedures will be in place on site that will be followed in the event of a major fire onsite:

- the Managing Director and FRS will be notified immediately by calling 999 and NRW as soon as practicable;
- if the fire is contained within a delivery vehicle, the vehicle will be quarantined, and the fire quenched using onsite fire-fighting equipment;
- should fire compromise its stability or integrity of the building, all personnel on site will be immediately evacuated;
- if it is safe do so, a temporary bund (firewater booms and drain covers) will be deployed. The temporary boom deployment would enable immediate containment and therefore, limiting overland flow preventing the percolation of firewater into the ground and also preventing the firewater entering the drainage system. If the fire was to occur within the main building, the firewater booms would be deployed at the door entrance to prevent firewater leaving the building, therefore, isolating the firewater from the external yard and drainage system. Any firewater held within the bund will be tested before removal offsite to a suitably licensed Facility once the fire has been extinguished; In the event that additional capacity is required, an emergency tanker response company will be called to attend site immediately (see Section 6.6. for more detail);
- drain covers will also be deployed to prevent any potentially contaminated firewater from entering the drainage system.
- if possible, waste that is unburnt will be dampened down to prevent the fire from spreading further and any contaminated runoff will be withheld within the temporary banded area;
- if possible, unburned material will be separated from the fire using site plant;
- the burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- the unprocessed wood waste material and the processed finished product stored within enclosed trailers are easily accessible as designed by the site layout arrangements enabling any fire inside to be extinguished. Platts will use their own vehicles to move trailers as soon as is reasonably practicable in a safe manner to prevent the fire spreading;
- depending on the scale of the fire, the site and buildings will be evacuated;
- Senior Management will notify adjacent businesses to the site directly in person or by telephone using the contact details provided in Appendix IV; and
- the FRS will instigate evacuation of neighbouring units if deemed necessary.

6.4.2. A Site Information and Key Contacts List is provided in Appendix IV which outlines the contact details of internal and external contacts to notify in the unlikely event of a fire on site. Out of hours telephone numbers are also provided.

6.4.3. During normal working hours, Senior Management will be available on site to co-ordinate the fire emergency response. Platts is proposing to operate 24/7 and therefore, Platts personnel will be on-site at all times. Senior Management will also be on call to attend site out of hours during any emergency scenario at the Facility.

6.4.4. On identification of a fire at the Facility, it will be the responsibility of a nominated member of Senior Management to contact all key contacts provided in Appendix IV of this

FPP to alert the nearby residents and businesses who may be affected by the fire.

- 6.4.5. In collaboration with the FRS, the need to evacuate personnel from adjacent buildings will be assessed and instigated if deemed necessary.
- 6.4.6. The Facility will not accept waste if there is an active fire on site. Waste will be diverted to a nearby suitably licenced site and, if possible, waste producers and Platts personnel on route for collection will be notified in advance to prevent vehicles arriving on site. Site personnel will be stationed in an appropriate location on Miners Park to redirect any delivery vehicles which were on route prior to the fire event occurring on site.
- 6.4.7. In addition, a laminated emergency information pack will be located at the site entrance as shown on the Fire Prevention and Mitigation Plan (Drawing ECL.088.01.01-04). The pack will contain the FPP document and associated drawings enabling FRS to view the plan in the event of their attendance out of hours. The pack will be routinely inspected as part of the site inspection protocols.

## 6.5. Fire Water Supply

- 6.5.1. All waste will be stored and treated on impermeable surfacing.
- 6.5.2. Water to actively fight a fire will be available from a number of nearby fire hydrants with locations of the closest five hydrants (marked as H) to the Facility (outlined in green) as shown in Figure 3. All fire hydrants in Figure 3 have been inspected in the last three years and conform to British Standard 750:2012.<sup>7</sup>

**Figure 3: Location of Nearest Five Fire Hydrants to the Facility**



<sup>7</sup> Location of fire hydrants and hydrant inspection information provided by David Bithell, Hydrant Engineer at North Wales Fire and Rescue Services. Information received - 05/05/2021.

- 6.5.3. The nearest fire hydrant to the Facility entrance is numbered 17421 in Figure 3 above and is located at NGR 332197 356420. The exact location of the nearest fire hydrants are shown on the Fire Prevention and Mitigation Plan (Drawing ECL.088.01.01-04) contained in Appendix I.
- 6.5.4. The FPP guidance firewater calculations state that a water supply of at least 2,000 litres a minute for a minimum of 3 hours for a 300m<sup>3</sup> pile of combustible material is required. Therefore, it has been estimated that based on a 472.5m<sup>3</sup> stockpile, this being the maximum sized combustible material stockpile on site (Finished Product - See Table 3), 567,000 litres of water over a 3-hour period would be required. Based on the largest stockpile of combustible waste (32.13m<sup>3</sup>), a significantly reduced quantity of firewater would be required (38,556 litres over a 3 hour period). The water available for firefighting will be taken from the hydrant marked in Figure 3.
- 6.5.5. It has been confirmed by Hafren Dyfrdwy<sup>8</sup> (water supplier) that the fire hydrant benefits from 9-inch mains with a pressure of 6.3 bar capable of delivering a minimum flow of 75 litres per second. Therefore, the use of the hydrant will enable the delivery of 4,500l of firewater per minute which is in excess of the 3,150l per minute required for the finished product largest pile (total of 567,000l divided by 180 minutes) and significantly in excess of the 214 litres per minute required for the largest combustible waste pile (38,556 litres divided by 180 minutes) Additionally, any firewater that pools on site surfacing will be utilised by the firefighting team, if possible.

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<sup>8</sup> Hydrant capability provided Hafren Dyfrdwy – Customer Service General Enquiries, Operations and Pressure Testing Team and Supply Team, information received 19<sup>th</sup> and 20<sup>th</sup> May 2021.

## 6.6. Firewater Containment

- 6.6.1. In the event of a fire, action will be taken to prevent potentially contaminated firewater from leaving the Facility including the deployment of booms and spill kit containment measures. The locations of these containment materials are provided on the Fire Prevention and Mitigation Plan (Drawing ECL.088.01.01-04).
- 6.6.2. Drain mats will be used to cover all drains within the permitted boundary. This will prevent any potential firewater runoff from entering the drainage network. The impermeable concrete surfacing will prevent any risk of potentially contaminated firewater from entering the ground or groundwater. There are no surface waters in close proximity to the Facility.
- 6.6.3. Booms will be strategically placed to form a barrier to contain the firewater. The location of the fire and fire-fighting technique and direction will determine the appropriate deployment location of the booms.
- 6.6.4. The combustible unprocessed waste will be stored within enclosed trailers as shown on the Fire Prevention and Mitigation Plan drawing (ECL.088.01.01-04). If a fire were to occur, booms will be deployed to create a temporary barrier. The booms would create a containment capacity of 33.75m<sup>3</sup> (15m x 15m x 0.15m (height of boom)). This will provide immediate firewater capacity and prevent the firewater from leaving site. It should be noted that the unprocessed waste material is stored a significant distance from the drainage network on site.
- 6.6.5. An emergency response service from Enviroclear Site Services Limited will be available 24 hours a day, 365 days of the year to attend the Facility to provide additional containment capacity. Enviroclear Site Services Ltd is located 11 miles from the Facility and has a large fleet of vacuum tankers ranging from 3,000 litres to 30,000 litres capacity. The travel time from Enviroclear depot to the Facility is approximately 15 minutes providing adequate time for the tanker(s) to arrive on site prior to the application of the firewater following travel time of the FRS and completion of risk assessment prior to active fire-fighting commencing. **Platts personnel to telephone 01978 840228 for immediate tanker assistance.**
- 6.6.6. The Senior Management Team will be responsible for the deployment of the firewater containment measures and will be appropriately trained. The FPP exercise drills will include differing fire scenarios and the deployment of the appropriate firewater containment measures.
- 6.6.7. Platts will have the capability of deploying the firewater containment measures within a matter of minutes. Platts is proposing to operate 24/7, however, if the site is unattended, the containment measures will be deployed within a maximum of 30 minutes.
- 6.6.8. The spill kits including the booms and drain mats will be checked every 3 months by site personnel and will be replaced as per the manufacturer's expiration dates if provided or alternatively, when on visual inspection, it is deemed necessary.
- 6.6.9. Depending on the scale of the fire, the FRS will co-ordinate the firefighting response which will include assessing the risk to retrieve the spill kit contents. The location of the firewater containment equipment has been chosen to enable quick and safe accessibility.

## 6.7. Management after a Fire Event

6.7.1. After a fire event, the following procedure will be implemented depending on the severity of the fire:

1. *A small and containable fire that can be dealt with in-house using suitably trained staff and firefighting equipment located on site:* the fire will be recorded in the site log, including the causes of the fire and methods used to manage the fire.
2. *A larger fire that requires the presence of the Fire and Rescue Service:* if the site operatives have been told to evacuate or cease operations by NRW and/or Fire and Rescue Service, the site personnel will wait until told safe to re-enter site. The fire will be recorded in the site log, including the causes of the fire and methods used to manage the fire.

6.7.2. The Senior Management Team will liaise with the NRW to determine a plan-of-action, to introduce waste transfer and storage operations at the site and the timescales involved to achieve this.

## 6.8. Fire Damage Extent and Decontamination

6.8.1. The extent of the fire damage will be assessed by the Senior Management Team and depending on the scale of the fire, the FRS may also be present.

6.8.2. Should damage be sufficient to prevent the site from being able to treat and store waste, the site will cease accepting waste and will divert to a suitably permitted Facility.

6.8.3. Depending on the scale of the fire, smoke particles may have been transported and deposited onto various surfaces within the affected building. The thermal degradation of certain material can cause corrosive deposits to be omitted within the smoke particulates. It is therefore important that such deposits are effectively neutralised. A specialist company will be commissioned to undertake post fire clean up and smoke damage decontamination.

6.8.4. The structural stability of fire damaged infrastructure will be assessed and approved by a professional prior to re-entry onto the site.

6.8.5. The FRS may have also isolated electricity and gas during the fire. This will be reconnected by a registered professional. The integrity and functionality of the drainage system will also be assessed and approved by a professional prior to recommencement of operations.

## 6.9. Fire Damaged Waste

6.9.1. A visual assessment will be carried out by the Senior Management Team to determine whether the waste can be treated on site. Wherever possible, unburnt wastes will be separated from fire damaged areas of waste. If waste piles have become mixed, then it is likely that the waste will be removed from site to a suitably licensed Facility.

6.9.2. Any quarantined waste, waiting for removal from site, will be stored to prevent the contamination of unburnt wastes on the site, as illustrated on the Fire Prevention and Mitigation Plan (Drawing ECL.088.01.01-04), contained within Appendix I.

6.9.3. The burnt waste will be removed off site within 24 hours. The Quarantine Area will benefit from at least 6m separation area to aid separation and management of wastes during an incident. Site staff will be trained in how to safely move quarantined waste to this area.

## **6.10. Recommencing Operations**

6.10.1. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this Fire Prevention Plan and Platts' EMS as required. Once this work has been undertaken, the Senior Management Team will revisit the site to ensure all of the above have been undertaken and the site can recommence operations.

## **7. CLOSURE**

**7.1.** This FPP is considered to be a 'working' document that will be reviewed and updated annually or as required should any of the following occur:

- a fire on site;
- a change or review of legislation;
- if the site is instructed to do so by NRW; or
- there are any changes to named contractors or emergency contacts.

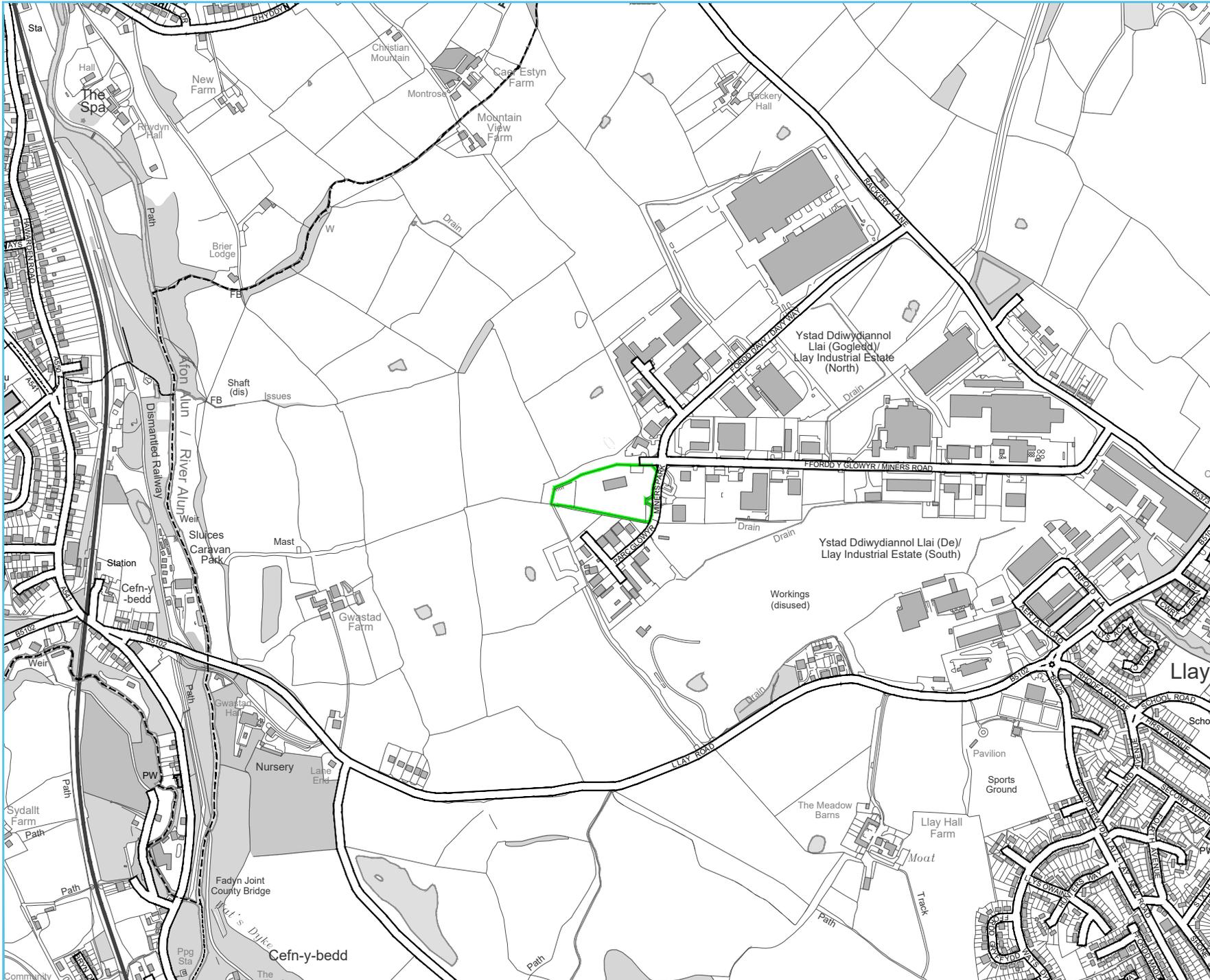
**7.2.** It will be the responsibility of Senior Management to maintain this FPP and to ensure it is adhered to in the event of a fire on site.

# APPENDIX I DRAWINGS



**LEGEND**

— ENVIRONMENTAL PERMIT BOUNDARY



Rev	Date	Details	Chkd
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**Environmental Compliance Ltd.**   
 Unit G1  
 The Willowford  
 Main Avenue  
 Treforest Industrial Estate  
 Pontypridd  
 CF37 5YL  
 Tel: 01443 841760  
 Fax: 01443 841761  
 Email: info@ecl.world  
 Web: www.ecl.world

**Client**  
  
 EST 1973  
 PLATTS  
 AGRICULTURE

Date	Scale	Drawn by	Checked by	Approved by
18/05/2021	1:10K @ A4	GTB	SJ	SJ

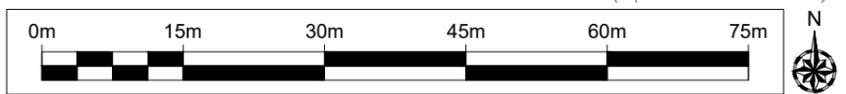
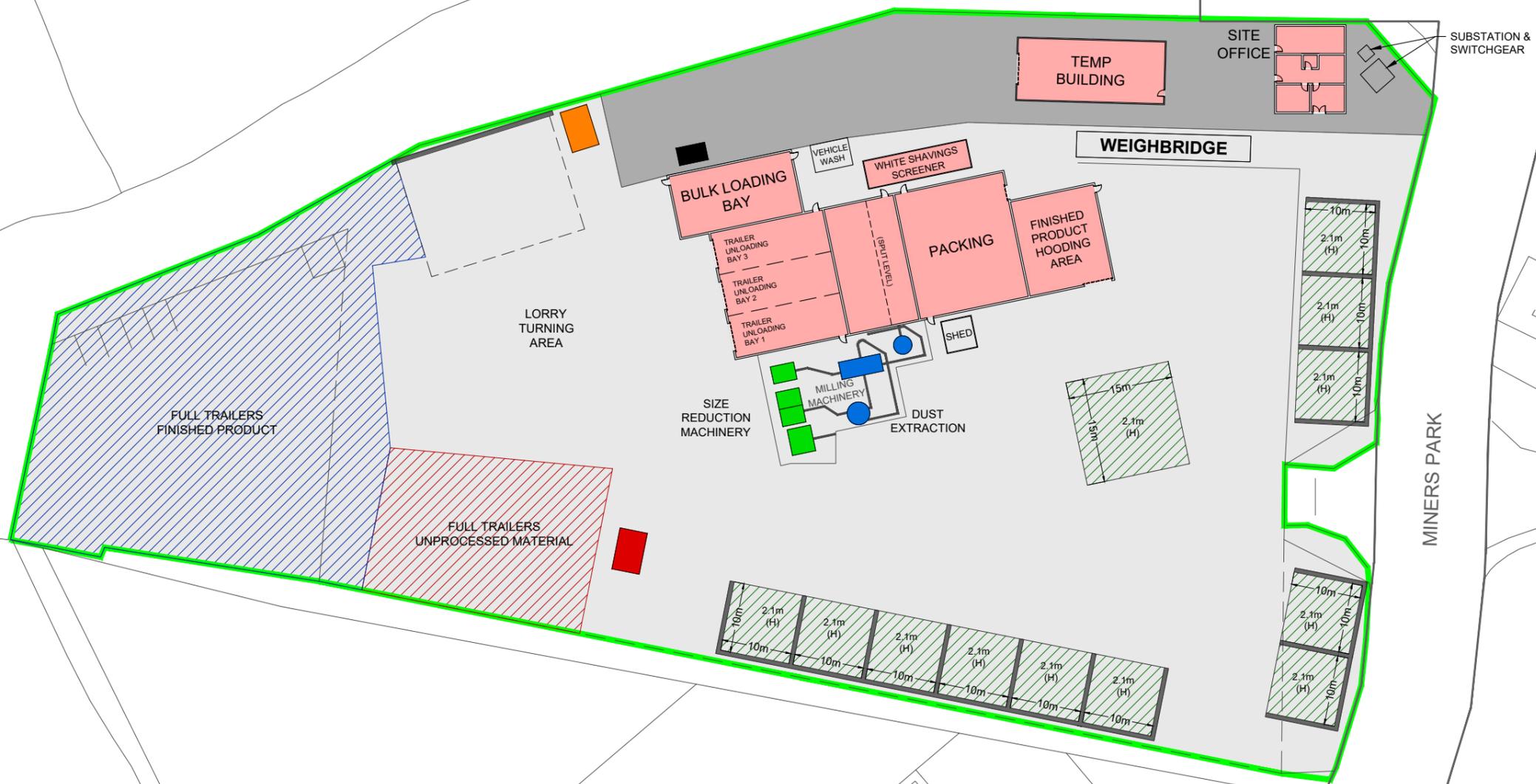
**Drawing Status**  
**WORKING DRAWING**

**Project Title**  
 ENVIRONMENTAL PERMIT APPLICATION  
 PLATTS AGRICULTURE LIMITED  
 MINERS PARK, LLAY INDUSTRIAL ESTATE  
 LLAY  
 WREXHAM

**Drawing Title**  
 SITE LOCATION PLAN

Drawing Number	Rev
ECL.088.01.01-01	-

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- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
  - CONCRETE
  - HARDSTANDING
  - BUILDINGS
  - TRAILERS CONTAINING UNPROCESSED MATERIAL
  - TRAILERS CONTAINING FINISHED PRODUCT
  - BALED FINISHED PRODUCT
  - BUNDED RED DIESEL TANK
  - NON-CONFORMING WASTE QUARANTINE AREA
  - EXTRACTION TRAILER - 4.4m(L) X 2.55m(W)



Rev	Date	Details	Chkd
<p>Environmental Compliance Ltd. <b>ecl.</b>            Unit G1            The Willowford            Main Avenue            Treforest Industrial Estate            Pontypridd,            CF37 5YL</p> <p>Tel: 01443 841760            Fax: 01443 841761            Email: info@ecd.world            Web: www.ecd.world</p>			
<p>Client</p>			
Date	Scale	Drawn by	Checked by
18/05/2021	1:750 @ A3	GTB	SJ
<p>Drawing Status</p> <p><b>WORKING DRAWING</b></p>			
<p>Project Title</p> <p>ENVIRONMENTAL PERMIT APPLICATION            PLATTS AGRICULTURE LIMITED            MINERS PARK, LLAY INDUSTRIAL ESTATE            LLAY            WREXHAM</p>			
<p>Drawing Title</p> <p>SITE LAYOUT PLAN</p>			
<p>Drawing Number</p> <p>ECL.088.01.01-02</p>			<p>Rev</p> <p>-</p>

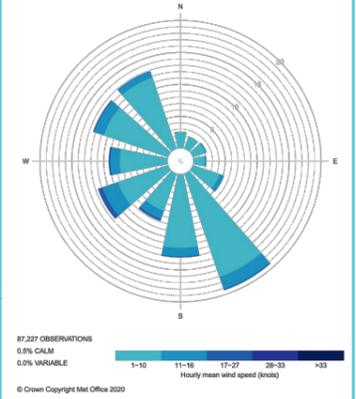


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- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
  - 1000m OFFSET BOUNDARY
  - DOMESTIC DWELLINGS
  - COMMERCIAL / INDUSTRIAL PREMISES
  - GRASS / SHRUB
  - TREES / WOODS
  - ROAD FEATURES
  - SURFACE WATER FEATURES

HOURLY MEAN WIND ROSE FOR HAWARDEN AIRPORT  
 Met Office  
 NGR: 3942 E 3647 N ALTITUDE: 11 metres AMSL  
 SEASON: ANNUAL Period of data: Jan 2010 - Dec 2019



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Rev	Date	Details	Chkd

**Environmental Compliance Ltd. ecl.**  
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Date	Scale	Drawn by	Checked by	Approved by
18/05/2021	1:7.5K @ A3	GTB	SJ	SJ

**WORKING DRAWING**

**Project Title**  
 ENVIRONMENTAL PERMIT APPLICATION  
 PLATTS AGRICULTURE LIMITED  
 MINERS PARK, LLAY INDUSTRIAL ESTATE  
 LLAY  
 WREXHAM

**Drawing Title**  
 SENSITIVE RECEPTOR PLAN

Drawing Number	Rev
ECL.088.01.01-03	-

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
  - CONCRETE
  - HARDSTANDING
  - BUILDINGS
  - TRAILERS CONTAINING UNPROCESSED MATERIAL
  - TRAILERS CONTAINING FINISHED PRODUCT
  - BALED FINISHED PRODUCT
  - BUNDED RED DIESEL TANK
  - NON-CONFORMING WASTE QUARANTINE AREA
  - EXTRACTION TRAILER - 4.4m(L) X 2.55m(W)
  - FPP QUARANTINE AREA
  - ▲ IGNITION SOURCE - GAS BOTTLES
  - ▲ COSHH STORAGE
  - S HIGH LEVELS OF SAWDUST
  - ▲ LOCATION OF FIRE PREVENTION PLAN
  - ▲ ELECTRICAL SHUT OFF POINT
  - ▲ WATER SHUT OFF POINT
  - FIREWATER CONTAINMENT EQUIPMENT
  - S FIRE SUPPRESSION SYSTEM
  - E FIRE EXTINGUISHER
  - E FIRE EXIT
  - E EMERGENCY ASSEMBLY POINT
  - H FIRE HYDRANT

**NOTE**  
FOR INTERNAL FIRE PREVENTION & MITIGATION INFO SEE DRAWING ECL.088.01.01-05

Rev	Date	Details	Chkd

**Environmental Compliance Ltd.**   
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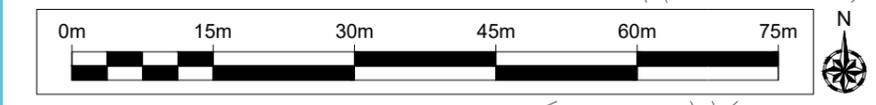
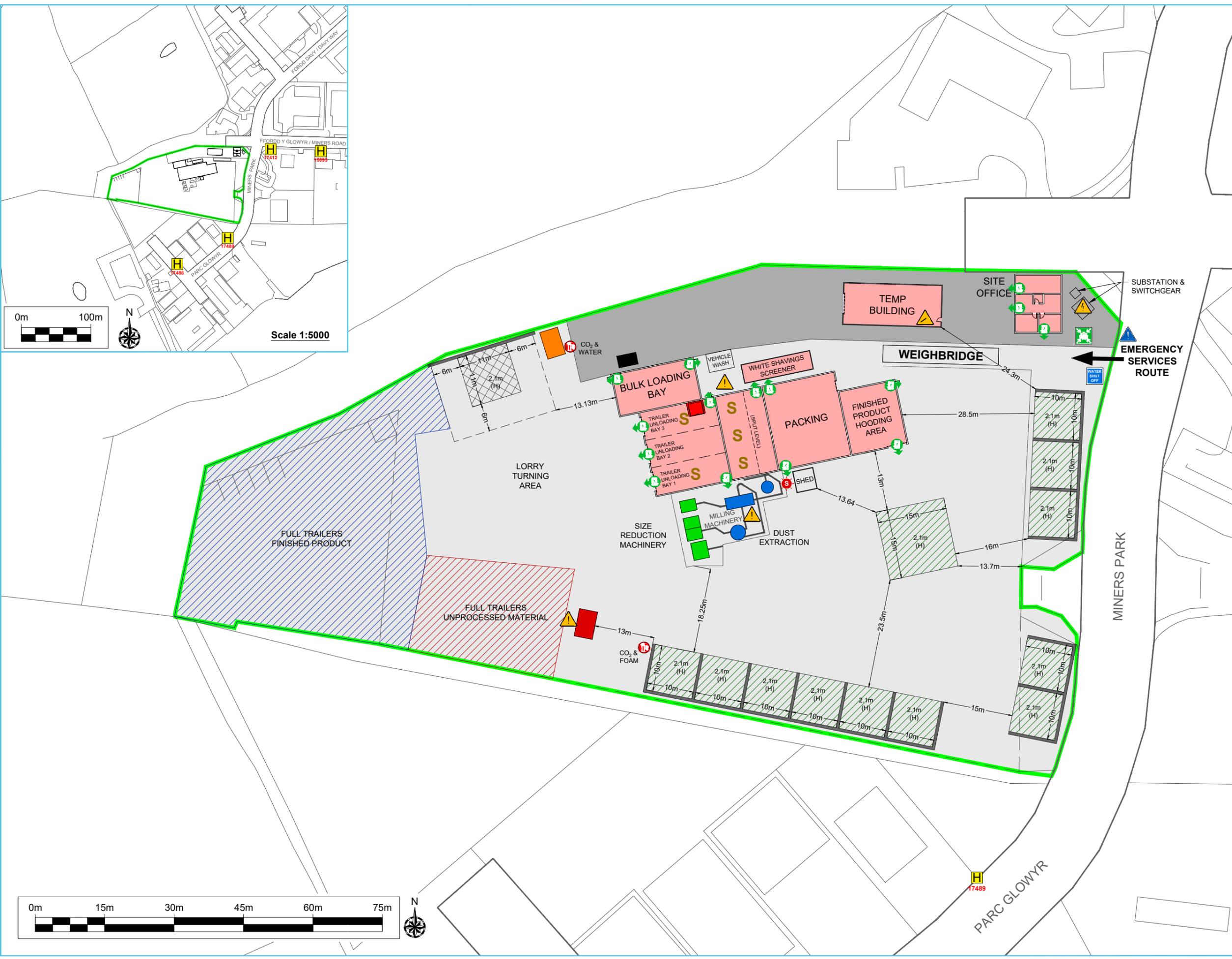
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**WORKING DRAWING**

**Project Title**  
 ENVIRONMENTAL PERMIT APPLICATION  
 PLATTS AGRICULTURE LIMITED  
 MINERS PARK, LLAY INDUSTRIAL ESTATE  
 LLAY  
 WREXHAM

**Drawing Title**  
 FIRE PREVENTION AND MITIGATION PLAN

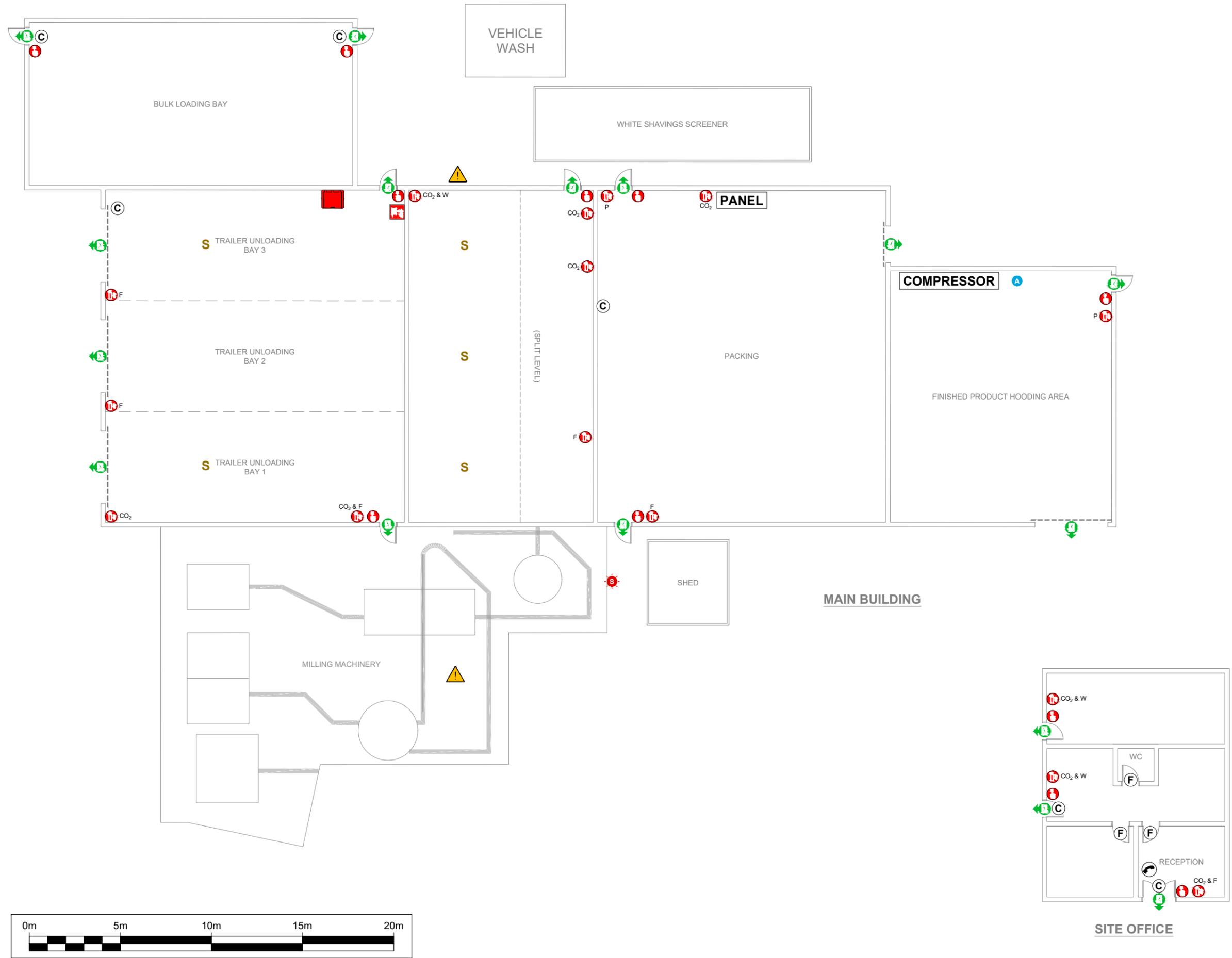
<b>Drawing Number:</b> ECL.088.01.01-04	<b>Rev:</b> -
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**LEGEND**

-  COSHH STORAGE
-  HIGH LEVELS OF SAWDUST
-  FIREWATER CONTAINMENT EQUIPMENT
-  FIRE SUPPRESSION SYSTEM
-  FIRE ALARM BREAK GLASS
-  FIRE EXTINGUISHER  
WATER = W  
POWDER = P  
CARBON DIOXIDE = CO<sub>2</sub>  
FOAM = F
-  FIRE HOSE
-  AIR RECEIVER
-  FIRE EXIT
-  SELF CLOSING DOOR
-  FIRE DOOR
-  TELEPHONE POINT

**NOTE**  
FOR EXTERNAL FIRE PREVENTION & MITIGATION INFO  
SEE DRAWING ECL.088.01.01-04



Rev	Date	Details	Chkd

**Environmental Compliance Ltd.**   
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18/05/2021	1:200 @ A3	GTB	SJ	SJ

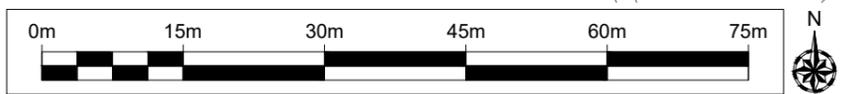
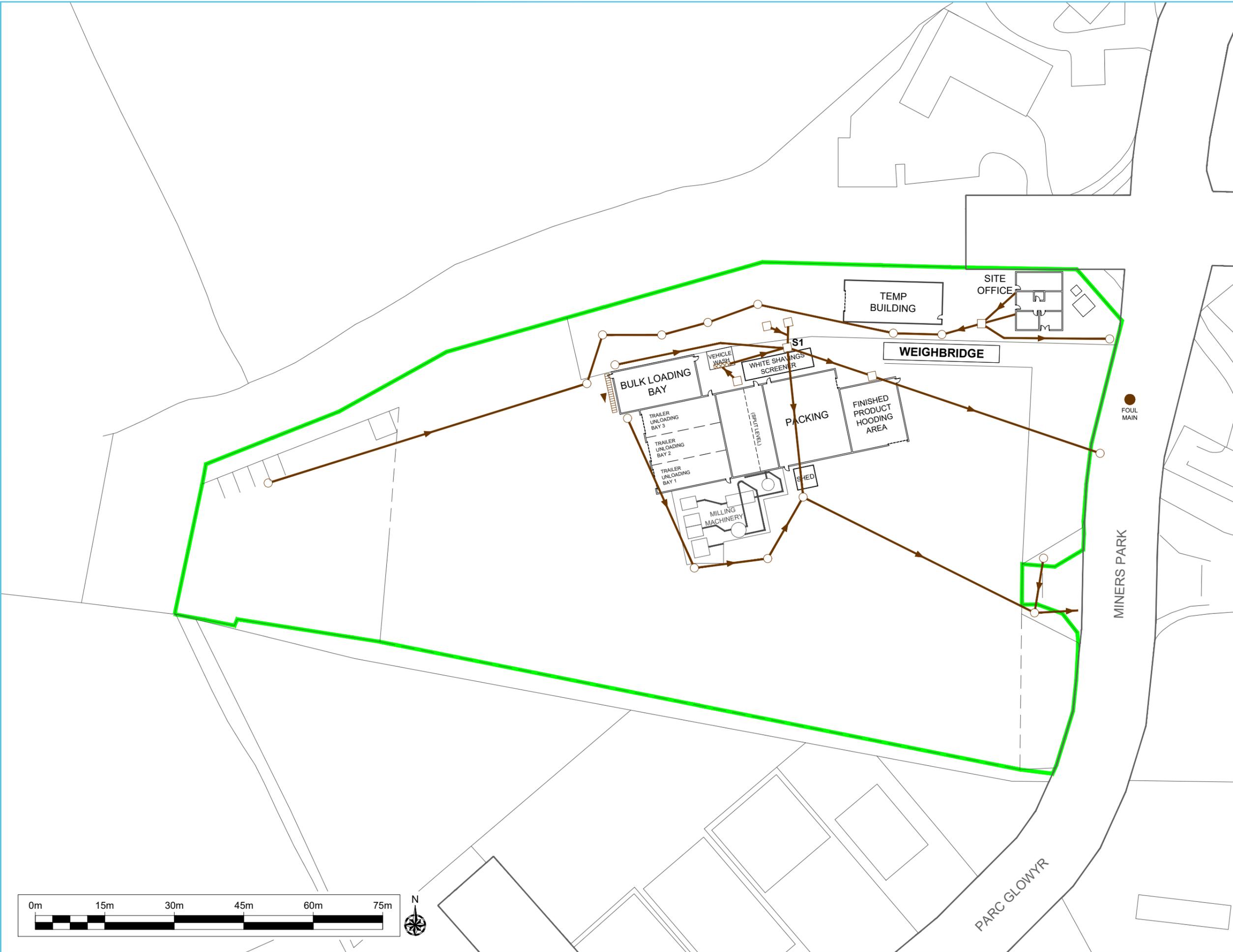
**WORKING DRAWING**

**Project Title**  
 ENVIRONMENTAL PERMIT APPLICATION  
 PLATTS AGRICULTURE LIMITED  
 MINERS PARK, LLAY INDUSTRIAL ESTATE  
 LLAY  
 WREXHAM

**Drawing Title**  
 FIRE PREVENTION AND MITIGATION PLAN  
 BUILDINGS

Drawing Number	Rev
ECL.088.01.01-05	-

- LEGEND**
- █ ENVIRONMENTAL PERMIT BOUNDARY
  - FOUL DRAINAGE
  - MANHOLE
  - INSPECTION COVER
  - ▣ INTERCEPTOR PIT
  - ▨ ACO / ECO DRAIN
  - S1** EMISSION POINT TO SEWER



Rev	Date	Details	Chkd

**Environmental Compliance Ltd.**  
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 The Willowford  
 Main Avenue  
 Treforest Industrial Estate  
 Pontypridd,  
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Date	Scale	Drawn by	Checked by	Approved by
18/05/2021	1:750 @ A3	GTB	SJ	SJ

Drawing Status: **WORKING DRAWING**

Project Title:  
 ENVIRONMENTAL PERMIT APPLICATION  
 PLATTS AGRICULTURE LIMITED  
 MINERS PARK, LLAY INDUSTRIAL ESTATE  
 LLAY  
 WREXHAM

Drawing Title:  
 DRAINAGE PLAN

Drawing Number	Rev
ECL.088.01.01-06	-



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## **APPENDIX II**

# **PLANNED PREVENTATIVE MAINTENANCE REGIME**

Planned Preventative Maintenance	Item has programmed pre-use checks	Operator Daily Check	Frequency of inspections	Last Inspection/Service	Notes
Baler 1		✓	500000 Bales	Feb-20	* Pending Due to Covid
Baler 2		✓	500000 Bales	Feb-20	* Pending Due to Covid
Baler 3		✓	500000 Bales	Feb-20	* Pending due to Covid
Robot 1		✓	500000 Bales	Feb-20	* Pending due to covid
Robot 2		✓	500000 Bales	Feb-20	* Pending Due to Covid
Hooder		✓	Annually	Feb-20	* Pending due to covid
Grecon Spark Detection System			6 monthly	Apr-21	
Dust Extraction / LEV testing			Annually	Nov-20	
Hammer Mill 1		✓	Daily		
Hammer Mill 2		✓	Daily		
Fork Lift Truck 1		✓	Annually	12/11/2020	
Fork Lift Truck 2		✓	Annually	12/11/2020	
Fork Lift Truck 3		✓	Annually	12/11/2020	
Interceptor			Quarterly	25/01/2021	Due 25/05/2021
Tele-handler		✓	Serviced every 2 weeks / Annually LOLER every 12 months	LOLER 05/01/2021	
GEHL		✓	Serviced every 2 weeks / Annually LOLER every 12 months	LOLER 05/01/2021	
Shunter		✓	12 Months MOT	Inspected 6 weekly / MOT DEC	
Nifty Lift		✓	6 Months	02/02/2021	
Hoover		✓	Annually	20/03/2020	* Pending due to Covid
Hook loader		✓	12 Months MOT	Inspected 6 weekly test Nov 2020	
Hook Loader		✓	12 Months MOT	Inspected 6 weekly test Dec 2020	
Power washer		✓	12 Months	Test 21/01/2021	



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# **APPENDIX III BLANK RISK ASSESSMENT/ PERMIT TO WORK**



## **Permit to work – hot work**

This permit is not valid until sections 1 to 4 are completed and the document signed.

**NOTE:** A Permit to Work **MUST** be signed off at the end of the work, sections 5 & 6 by both the person conducting the work and the Platt representative, & a new Permit issued daily, if one is required.

<b>Section 1</b>
Area to be worked in:
Work to be carried out:

<b>Section 2 - Plant isolation and safety precautions</b>		
The plant / area detailed in section 1 has been made safe as shown below: -		
Y/N		
Energy supply	<input type="checkbox"/> <input type="checkbox"/>	Point of isolation
Electrical power	<input type="checkbox"/> <input type="checkbox"/>	
Gas fuel	<input type="checkbox"/> <input type="checkbox"/>	
Oil fuel	<input type="checkbox"/> <input type="checkbox"/>	
Compressed air	<input type="checkbox"/> <input type="checkbox"/>	
Steam	<input type="checkbox"/> <input type="checkbox"/>	
Pneumatics	<input type="checkbox"/> <input type="checkbox"/>	
Hydraulics	<input type="checkbox"/> <input type="checkbox"/>	
Ventilation carried out if necessary	<input type="checkbox"/> <input type="checkbox"/>	
Clear of: combustible/flammable/ liquids & materials	<input type="checkbox"/> <input type="checkbox"/>	
<b>Comments</b>		
Any conditions to be aware of?		
Staff aware of works?		
Emergency procedure explained		

<b>Section 3</b>	<b>Section 4</b>
I certify that I have examined the area in accordance with the attached checklist and am satisfied that it is safe to perform hot work.	I hereby declare that I understand the area referred to in Section 1 above is safe to work on for the hot work specified and that this permit applies only to that area.
Name:	Name:
Signed:	Signed:
(Authorised person)	(Person carrying out the work)
Date:	Date:
Time:	Department/Company:
	Start time: <span style="float: right;">Finish time:</span>

<b>Section 5</b>	<b>Section 6</b>
Platt supervisor/employee	Contractor/engineer
Cancellation of permit This permit to work is now cancelled. A new permit will be required if further work is required	Cessation of work The hot work specified in Section 1 has ceased and all relevant persons, materials and equipment withdrawn and safeguards replaced.
Name:	Name:
Signed:	Signed:
Date:	Date:
Time:	Time:



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## **APPENDIX IV SITE INFORMATION AND KEY CONTACT DETAILS**

## Site Information and Key Contact Details

<b>Operator</b>	Platts Agriculture Limited		
<b>Site Address</b>	Miners Park, Llay Industrial Estate, Llay, Wrexham, LL12 0PJ.		
<b>Name</b>	<b>Description</b>	<b>Contact Details (Office Hours)</b>	<b>Contact Details (Out of Hours)</b>
<b>Internal</b>			
Caroline Thedens	Managing Director	0779914141	
Nigel Thedens	General Manager	0768585262	
Brian McKay	Environmental Manager	01978 854666	
Office	General Enquiries	01978 854666	-
<b>External – Emergency Services</b>			
Fire Rescue Service – North Wales Fire and Rescue Services, Wrexham LL13 7YU	Non-Emergency	0300 123 3247	
	Emergency Only	999	
Police – North Wales Police, Davy Way, Llay, Wrexham, LL12 0PG	Non-Emergency	0300 330 0101 or 101	
	Emergency Only	999	
Medical Assistance	Non-Emergency – NHS Helpline	0845 46 47	
	Emergency Only	999	
<b>External - Regulators</b>			
Natural Resources Wales	Emergency (24 hour hotline)	0300 065 3000 - Option 1	
	General Enquiries (Mon-Fri 9am-5pm)	0300 065 3000	
Health and Safety Executive	Incident Contact Centre	0345 300 9923	
<b>External – Key Services</b>			
Enviroclear Site Services Limited	Emergency Tanker Response	01978 840228	
Hafren Dyfrdwy	Water Supplier Emergency Hotline	0800 085 8033	
Welsh Water	Sewerage Undertaker Emergency Hotline	0800 085 3968	
Energy Supplier	Emergency Hotline	105	
Grainger Fire and Security	Fire Safety and Security Contractor	0151 220 4068	-
Environmental Compliance Ltd	Environmental Consultant	01443 841760	-

### Site Information and Key Contact Details (Cont.)

<b>Operator</b>	Platts Agriculture Limited	
<b>Site Address</b>	Miners Park, Llay Industrial Estate, Llay, Wrexham, LL12 0PJ.	
<b>Name</b>	<b>Description</b>	<b>Contact Details (Office Hours)</b>
<b>External – Nearby Sensitive Receptors</b>		
NPC Commercials Limited	Neighbouring Units	01978 255892
Llay Cafe		01978 856556
Quantum Traffic Management		01978 280144
Platts Commercial Services		01978 857050
Wrexham Truck and Trailer Limited		01978 855028
Aston Jones Limited		01978 856985
Clwyd Injection Services		01978 856677
Hayakawa International UK Limited		01978 853366
Miners Road Industrial Estate – General Enquiries		01978 667000