



Company Secretary
South Wales Wood Recycling Limited
Old Post Office
Curwen Terrace
North Cornelly
Bridgend
CF33 4AW

Our Ref: CF/ 01F-006-502 IN01
Your Ref:

Date: 20 October 2016

Contact: Watch Manager Christian Ferris
Tel: 07590 900950
E-mail: firesafety@southwales-fire.gov.uk

Dear Sir/Madam

**THE REGULATORY REFORM (FIRE SAFETY) ORDER 2005
SOUTH WALES WOOD RECYCLING LIMITED, LOCKS YARD COMPLEX,
HEOL LLAN, COETY BRIDGEND CF35 6BU**

Following an audit of the fire safety arrangements at the above premises on 11 October 2016, the Fire and Rescue Authority is of the opinion that you have failed to comply with requirements imposed on you by The Fire Safety Order.

You should note that failure to comply with any requirement of the legislation is an offence if it places one or more relevant persons at risk of death or serious injury. This letter and attached schedule, which do not constitute an enforcement notice under Article 30 of The Order, are issued without prejudice to any other enforcement action which may be taken regarding the failures to comply with the Legislation.

I confirm that the measures contained in the attached schedule are to be carried out to comply with the above legislation.

A further visit will be made to ensure that the requirements of the schedule have been implemented.

If you are in any doubt as to the obligations placed upon you by the legislation, or if there is any relevant matter upon which you require clarification, do not hesitate to contact the officer named above.

Yours faithfully

A handwritten signature in black ink, appearing to read 'C Ferris'.

Signed

C Ferris

cc george@swwr.co.uk

David.Morgan@cyfoethnaturiolcymru.gov.uk

Schedule of Works Required

1 **Article 8. Duty to Take General Fire Precautions.**

1.1 **Stack sizes are excessive.**

- 1.1.1 During the inspection the stack sizes throughout the site were witnessed as being excessive and not in line with the National Resources Wales Fire Prevention and Mitigation Plan Guidance on Waste, version1 2016. You must ensure that the stacks at the site are compliant with recommended stack sizes in the guidance (Table 1)
- 1.1.2 Table 1 state's that processed wood should be no higher than a maximum 3m in height.
- 1.1.3 Table 1 state's that unprocessed wood should be no higher than a maximum of 5m in height.
- 1.1.4 The height should be taken as the longest measurement between the base of the stack and the top. This may not be the highest point if the ground is uneven
- 1.1.5 Table 1 also gives reference to max area, max vol and length and width.

1.2 **The separation between stacks is not suitable and sufficient.**

- 1.2.1 The separation of the stacks throughout the site are inadequate and not in line with the National Resources Wales Fire Prevention and Mitigation Plan Guidance on Waste, version1 2016.
- 1.2.2 Table 1 state's that piles of the required size should be separated by a minimum separation of 6m.
- 1.2.3 Treat two or more stacks as one stack, if: They are within an area not exceeding 235 square metres and the longest dimension doesn't exceed 20 metres.

Or

The space between them does not meet the minimum separation distances set out in the following table and/or does not allow FRS vehicles to pass freely between them.

Table1

Material	Max height (m)	Length/width (m)	Max vol (m ³)	Max area (m ²)	Min separation (m)
Paper, cardboard and rags	5	20	750	235	6
Plastic rubber and other materials	5	20	450	235	6
Fridges, computers and electrical equipment	5	20	300	235	6
Processed wood including sawdust, shavings, chips	3	10	150	100	6
RDF and fragmentiser fluff	5	20	450	235	6
Unprocessed wood	5	20	750	235	6

1.3 There was no management procedure in place to control stock rotation.

- 1.3.1 Stock rotation should be every 6 months for raw wood and every 3 months for chipped wood. There was no documented evidence that this was being controlled effectively.

2 Article 9. Risk Assessment.

2.1 The fire prevention plan is not suitable and sufficient.

- 2.1.1 The fire prevention plan makes no reference to the Fire Response Team being able to respond fully to an emergency throughout the night. The emergency section of the prevention plan must have procedures in place 24/7. Plant machinery is essential to stopping the spread of fire by removing the affected combustible materials. A delay in these procedures will seriously affect the size of the fire.

3 Article 21. Training.

3.1 The training does reflect the fire prevention plan.

- 3.1.1 Training must be given to the employees in line with the fire prevention plan. Where there is offensive Firefighting in the form of a Fire Response Team carried out by employees the training provided must reflect this.

4 Article 38. Maintenance of Measures Provided for Protection of Fire-fighters.

- 4.1 **Failure to maintain and keep in efficient working order facilities, equipment and devices provided for the use by or protection of fire-fighters on your premises.**

- 4.1.1 In order to safeguard the safety of fire-fighters in the event of a fire, the Responsible Person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises for use by or protection of fire-fighters are subject to a suitable system of maintenance and are maintained in an efficient state in efficient working order and in good repair.

Note: These may include:

- Access for fire appliances, aerial appliances and fire fighters.
- water supplies.

- 4.1.2 During the inspection there was no access for Firefighting to a large number of the stacks.

The stacks were positioned right next to the boundary fence. Figure 1 of the National Resources Wales Fire Prevention and Mitigation Plan Guidance on Waste, version1 2016 depicts there should be a minimum of 6m separation from buildings and boundary fences.

- 4.1.3 Water supplies on site need to be improved. You must have sufficient water supplies available to your site.

Depending on your site this could be water in storage tanks or lagoons on site, or access to hydrants or mains water supply (Evidence of this solution is required)

Use this estimate to calculate the volume of water you will need:

A 300m³ pile of combustible material will normally require a water supply of at least 2,000 litres a minute for a minimum of 3 hours.

You may be able to reduce water volumes needed if you have a system that lets the fire and rescue service re-circulate the water they are using to fight the fire (fire water). However, you may need to filter this water and the fire and rescue service will also need to connect to your system. It may not always be appropriate or safe to re-circulate the water.

Alternatively smaller stack sizes and greater separation will reduce the amount of water required.