

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

Company Secretary
Alan's Skip Hire Wales Limited
The Mill
Morton
Oswestry
Salop
SY10 8BH

Application reference: PAN-001580 (EPR/WP3094FB/V005)

Operator: Alan's Skip Hire Wales Limited

**Facility: ASH Wrexham Recycling Centre, Site One, Redwither Road, Wrexham
Industrial Estate, Wrexham, LL13 9RD**

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, duly made 23/06/2017.

The information requested should be sent to the following address by 10/10/2017.

Information should be sent to:

louise.bailey@cyfoethnaturiolcymru.gov.uk

Name	Date
Louise Bailey	26/09/2017

Authorised on behalf of Natural Resources Wales

Schedule

Fire prevention and mitigation plan

Our new guidance – Fire prevention and mitigation plan guidance – waste management (version 2) was published in August 2017. You will therefore be required to have a fire prevention and mitigation plan that complies with the new guidance from point of permit issue.

It is strongly advised that you revise your Fire prevention and mitigation plan in line with our advice below, AND in line with our new guidance which can be found on our website: <http://naturalresources.wales/media/682525/guidance-note-16-fire-prevention-mitigation-plan-english.pdf>

Required amendments:

1. Make reference to the version of the guidance you have based your Fire prevention and mitigation plan on. I acknowledge that this was not an issue previously as there was only one version.
2. The guidance requires you to provide a site plan (drawn to scale) showing a compass rose showing north and the prevailing wind direction. This should be included in the plan.
3. Section 3.1- Fire Prevention states *“Stockpiles of waste will be inspected daily and observed for any signs of fire, e.g. smouldering, excessive steam, odours, heat etc.”*
How will the stockpiles be inspected and observed? Methods should be included in the plan.
4. In section 3.3. fire containment- drainage you state *“Following a fire, if firewater has been contaminated through extinguishing wood fire only, it may be stored on site and used to dampen down wood stockpiles, once site operations have commenced. This contaminated water would only be used to dampen lower grade B wood stockpiles. As the water would only be contaminated with carbon from the wood fire, it is deemed safe and appropriate to use it for dust suppression on lower grade stockpiles, as this material would not be adversely affected by the contaminated water.”*
How have you come to conclusion that it would only be contaminated with carbon? How can you be sure that other by-products of combustion which can pollute will not be contained within the water? This should be detailed within the plan.
5. Section 3.3. fire containment-fire breaks you state *“Combustible waste will be stored within bays or designated areas and the height of stockpiles will not exceed the height of the bay walls or 6 metres for waste stored externally and outside of bays, to create significant permanent fire breaks between combustible materials and limit the spread of fire.”*
This was highlighted during the site visit with the fire service that the latest version of the guidance sets 4m height with a freeboard to prevent fire spread

Ffôn: 0300 065 4213

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg

Tel: 0300 065 4213

louise.bailey@naturalresourceswales.gov.uk

Permitting Service, Natural Resources Wales, Cambria
House, 29 Newport Road, Cardiff, CF24 0TP

www.naturalresourceswales.gov.uk

Correspondence welcomed in Welsh and English

between bays. Please amend the plan to reflect the guidance and discussions with the fire service.

6. On-site fire hydrants should be clearly marked to ensure that they are not inadvertently covered or impeded which could render them unusable if a fire occurred. This should be detailed in the plan.

Draft permit

The draft of your environmental permit is enclosed. I'm sending it to you so you can check we've stated your details correctly and it covers the activities you applied for. We're not asking for comments on the conditions we've used or how the permit is presented.

If you've concerns about the conditions we've chosen you may discuss this with me and I can explain why they've been included. Please note we can't change the standard wording of conditions in our published templates which have been used in your permit.

If you consider that there are any errors in your details or the activities stated, or if it refers to matters which you regard as being confidential or affecting national security, please let me know by the schedule 5 notice deadline date.