



Company Secretary
Metech Recycling Uk Ltd
Hirwaun Industrial Estate
Hirwaun
Aberdare
CF44 9UP

Our Ref: CF/ 16C-038-650 IN01
Your Ref:
Date: 30 March 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
METECH RECYCLING UK LTD HIRWAUN INDUSTRIAL ESTATE
HIRWAUN ABERDARE CF44 9UP**

Following an audit of the fire safety arrangements at the above premises on 17 March 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 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

Signed

C Ferris

for Assistant Chief Fire Officer

cc metechrecyclinguk@gmail.com

kelly.sherratt@cyfoethnaturiolcymru.gov.uk

Schedule of Works

1. **Article 8 Duty to take general fire precautions.**

1.1 **General fire precautions to ensure the safety of relevant persons on the premises have not been taken.**

1.1.1 General fire precautions must be taken to ensure the safety of relevant persons on the premises.

General fire precautions include:

- measures to reduce the risk of fire on the premises and the risk of the spread of fire on the premises.
- measures in relation to the means of escape from the premises.
- measures for securing that, at all material times, the means of escape can be safely and effectively used.
- measures in relation to the means for fighting fires on the premises.
- measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises.
- measures in relation to the arrangements for action to be taken in the event of fire on the premises (instruction and training of employees and measures to mitigate the effects of the fire).

You must:

- manage all stacks to below the maximum sizes and separation distances given in the following table
- have adequate water supplies available at all times to fight a fire
- enable easy access for FRS vehicles around the whole site
- manage all stacks of materials that can spontaneously combust to ensure that they are less than 3 metres high

When calculating stack separation distances you must apply these rules:

- 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
- 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

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.

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	15
RDF (use as for plastics above)	5	20	450	235	6
Wood	10	20	1370	235	6

Access for the FRS vehicles should be unobstructed at all times and meet as a minimum the requirement in the table below. You should also consider how fire appliances can turn around if they have entered your site.

Appliance	Min Width of Road (m)	Min Width of Gateway (m)	Min Clearance Height (m)	Min Weight Restriction (tonnes)	Min Stack Access Requirements (m)
Water Tender	3.7	3.2	3.7	12.5	4 - for at least ¾ of the perimeter length
High reach	3.7	3.2	4	24	4

- 1.1.2 The main risks associated with outdoor storage are outdoor fires preventing escape from the building or undetected fire spread to the building. Fires are most likely to start in waste material or dry undergrowth. Tarpaulin, jute and plastic sacks can readily burn too. Sparks, cigarettes and arson are the likely ignition sources.

To reduce these risks, ensure that goods, materials, pallets and vehicles are sited in designated storage areas away from the building, fire exits, windows and boundary fences;”

2 **Article 9. Risk Assessment.**

2.1 **The fire risk assessment has not been reviewed on a regular basis.**

- 2.1.1 The fire risk assessment must be reviewed at regular intervals, at least annually, so as to keep it up to date and evidence of the review maintained.

- 2.1.2 The significant findings of the fire risk assessment must be made available so that a determination can be made as to whether the risk assessment is suitable and sufficient.

Significant findings of the assessment should include details of: -

- The fire hazards identified.
- The actions that have been taken or will be taken to remove or reduce the chance of a fire occurring (preventative measures).
- Persons who maybe at risk, particularly those at greatest risk.
- The actions you have taken or will take to reduce the risk to people from the spread of fire and smoke (protective measures).
- The actions people need to take in case of fire, including details of any persons nominated to carry out a particular function (emergency plan).
- The information, instruction and training you have identified that people need and how it will be given.

2.2 A fire prevention plan has not been carried out.

- 2.2.1 The Responsible Person must develop and implement an accident plan, as required by your permit, to not only prescribe steps you are taking to prevent a fire, but also how you manage your site to allow the fire to be tackled quickly, effectively and safely.

Although you are responsible for producing the accident plan for your site, liaison with your local FRS is recommended as it will assist the FRS with managing the risk in their area enabling them to respond more effectively should a fire occur.

2.2.2 Your accident plan must include:

- communication arrangements, e.g. named contacts, key holders with their telephone numbers
- names, types, quantities and properties of combustible and other hazardous materials on your site
- number of people working on site (staff and contractors), including any differences between weekdays/weekends and times of the day
- number and types of heavy plant and machinery and operators on site to assist with initial fire breaks
- likely burn times of the material
- procedures for the disposal of firewater and any other waste arising during a fire
- the procedures your staff should follow if a fire starts. This must cover the period before the FRS arrives and until recovery has been completed, including arrangements during and outside normal working hours.
- a site plan showing: A layout of buildings;
 - any areas where hazardous materials are stored on site (location of gas cylinders, process areas, chemicals, stacks of combustible materials, oil and fuel tanks)
 - main access routes for fire engines and any alternative accesses

- access points around the site perimeter to assist fire fighting
- hydrants and water supplies
- any watercourse, borehole, or well located within or near the site
- areas of natural and unmade ground
- the location of plant, protective clothing and pollution control equipment and materials
- drainage systems, including foul and surface water drains, and their direction of flow and outfall points
- the location of drain covers and any pollution control features such as drain closure valves/penstocks and firewater containment systems

2.2.3 Further guidance on fire risk assessment and other associated fire safety measures are available in H.M. Government publication “Factories and Warehouses” & “Office’s and Shops” Guide’s which is available from Her Majesty’s Stationary Office. It is also available from the Department of Communities and Local Government Website to purchase or download free of charge, via the following link:

http://www.southwales-fire.gov.uk/English/business_fire_safety/Pages/default.aspx

Further advice and guidance in relation to waste sites is provided in TGN7.01.
<http://www.cfoa.org.uk/16192>

3 **Article 12. Elimination or Reduction of Risks from Dangerous Substances.**

3.1 **Arrangements for the safe handling and/or storage and/or transport of dangerous substances and/or waste containing dangerous substances are inadequate.**

3.1.1 Measures for the safe handling, storage and transport of dangerous substances and waste containing dangerous substances must be taken.

3.1.2 Where LPG in cylinders or cartridges is present, the Responsible Person will need to take particular care to minimise the possibility of its involvement in a fire.

All stored LPG cylinders, full and empty, should be separate from other flammable and incompatible materials, in a safe and secure location, either in the open air or in a properly constructed and adequately ventilated storeroom.

Further guidance on the safe storage of LPG is available from your supplier or the Liquefied Petroleum Gas Association’s Code of Practice “CoP 7- Storage of Full and Empty LPG Cylinders and Cartridges”

4 **Article 14. Emergency Routes and Exits.**

4.1 Fire exit doors cannot be easily and immediately opened in an emergency.

4.1.1 Remove existing lock fastenings from the exit door located in the ground floor office area. If this door is required to be kept locked, it should be fitted with an approved type emergency lock that can be operated from the escape side of the door without the use of a key.

4.1.2 Doors used for means of escape are to be kept unlocked and unfastened at all times when persons are in the premises. If for security reasons it is essential to keep such doors secured, it should be by means of a panic latch, panic bolt or some other approved type emergency lock which ensures that the door can be opened readily by persons escaping from the building, without having to use a key.

4.2 Obstructions.

4.2.1 The routes to emergency exits from premises and the exits themselves must be kept clear and free of obstruction at all times to allow persons to evacuate the premises as quickly and safely as possible.
It was evident during the inspection that there were combustible items stored against the rear fire exit doors of the factory.

5 Article 17. Maintenance.

5.1 The fire alarm records were not available at the time of the inspection.

5.1.1 To ensure the continuing good operation of the fire alarm system, routine inspections and tests should be undertaken in accordance with BS 5839: Part 1 which indicates the frequencies as follows:

- Daily checks.
- Weekly test.
- Periodic inspection and test by a competent person but no less frequently than six monthly.
- Annual.
- Non routine test, e.g. inspection and test of the system following a fire.

If applicable, in premises in which some employees only work during hours other than at which the fire alarm system is normally tested, additional tests should be carried out at least once a month to ensure familiarity of these employees with the fire alarm signals.

The date of all such tests and any resulting maintenance of the system should be recorded in a logbook.

5.2 The emergency lighting records were not available at the time of the inspection.

5.2.1 Routine inspections and tests of the emergency lighting system should be undertaken on the basis of BS 5266: Part 8 which, among other things, indicates that tests should, wherever possible, be undertaken at time of minimum risk, and associated with inspections, at frequencies as follows:

- Daily check.
- Monthly test.
- Subsequent Annual Test.

The date of all such tests and any resulting maintenance of the emergency lighting system should be recorded in a log book with the exception of the daily test, where there are no faults or repairs found.

6 **Article 21. Training.**

6.1 **Staff training.**

6.1.1 All staff should be provided with adequate fire safety training by a competent person. The type of training should be based on the particular features of the premises and should:

- Take account of the findings of the risk assessment and fire prevention plan.
- Explain the emergency procedures.
- Take account of the work activity and explain the duties and responsibilities of staff.
- Take place during normal working hours and be repeated periodically where appropriate.
- Be easily understandable by staff and other people who may be present.
- Be tested by fire drills.

6.1.2 All staff fire training/fire drills should be recorded in the fire logbook. All training/fire drill records should be available for inspection by the Fire Authority at all reasonable times.

Goodwill Advice;

At the time of the inspection the premises was severely damaged by fire and the company were in the process of possibly relocating. The recommendations above should be followed in to their new premises.