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Sharon Holman
Wrexham County Borough Council
Development Control
16 Lord Street
Wrexham
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Sent Via Email

Ref: JB/JB/2798ma/L004m

Date: 25 Aug 2017

Dear Sharon,

OUTLINE APPLICATION (WITH ALL MATTERS RESERVED APART FROM ACCESS) FOR ROADSIDE SERVICES INCORPORATING A PETROL FILLING STATION WITH ANCILLARY KIOSK AND ASSOCIATED CAR PARKING AND WORKS LAND WEST OF WREXHAM GOLF CLUB, HOLT ROAD, LLANYPWLL, WREXHAM, LL13 9SB

I write in response to the letter received from National Resources Wales (NRW) in respect of the above application. This letter deals specifically with the following queries raised by NRW:

- Requirement 1 – Confirmation of whether fuel is to be stored above or below ground, and if underground, its justification.
- Requirement 2 – Confirmation that if fuel is stored below ground the storage tanks will be located above the water table.
- Requirement 3 – The site drainage should be revised so that the car wash area drains to the foul sewer, but not via the proposed class 2 forecourt separator.

These matters are dealt with in turn in the subsequent paragraphs.

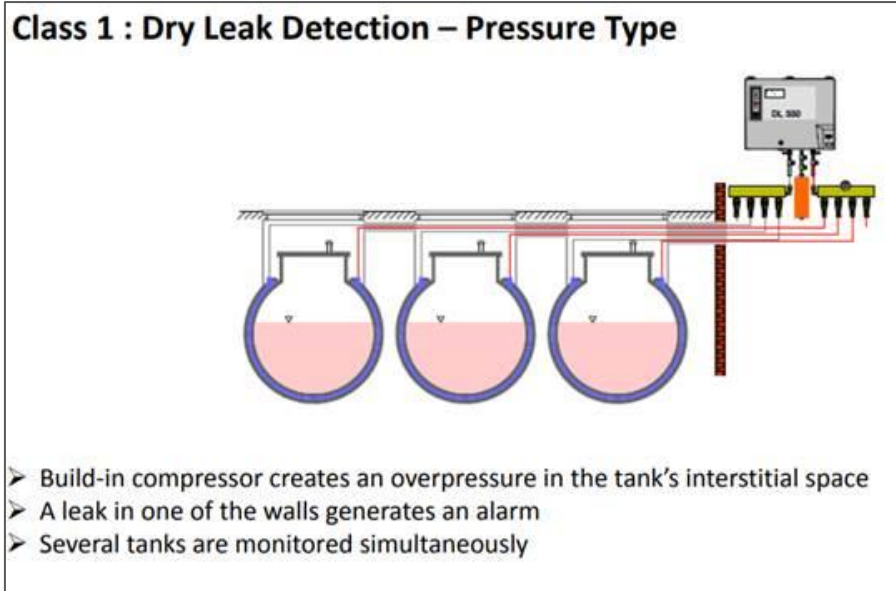
Requirement 1

Whilst the application is submitted in outline at this stage, the proposed occupier of the site; Euro Garages, would install below ground fuel storage tanks which are designed to prevent ground contamination and include a leakage detection system. A copy of a typical cross-section for their underground tanks is attached to this letter for information. The use of below ground storage tanks is typical and will help to ensure the delivery of a high-quality development that respects the site's location.

Euro Garages operate a monitoring system and use an independent company; Fairbanks Environmental, to help monitor all petrol filling station tanks. A letter from Fairbanks setting out how the process works is also attached to this letter. As part of this, Euro Garages include the following 3 processes all of which simultaneously operate to ensure a failsafe:

1st Process:

- All of our tanks are double skin steel tanks.
- All of our new to market sites are constructed with a fuel management system which comprises of a Dry Leak Detection System (see image below).



- The above system is constantly monitored but if an alarm is triggered or a failure is detected it is unlikely that any fuel is lost into the ground. When an alarm is triggered it is due to the failure of the outer skin and the fuel is retained within the tank itself (inner skin). However, if this does happen then the fuel is removed from the tank within 4 hours (vacuum tank on site within 1 hour and 2 hours to clear a fuel tank – as an aside, our tanks are never full as we only fill them up for three days of stock which normally means they are half full to $\frac{3}{4}$ full).
- It will always be the outer skin to fail first as the inner and outer skins are manufactured to be smooth and are coated with a specialist coating to ensure they are smooth. Any dents will create rust which would normally only happen to the outer skin. However, before a tank is installed into the ground they are manually inspected by a Petroleum Inspector for any dents. This is a detailed examination and not a 'once over'. Once approved, the tank is lowered into the ground. If it fails, then the tank will not be allowed into the ground.
- Once the fuel is removed then the tank is checked to identify the source. Once identified, rather than repairing (which would create weaknesses) we would install a new bladder (essentially a new skin) inside of the tank so it is a new 2 skin tank.
- The tanks have a life span of 35 years.

2nd Process (running simultaneously):

- We operate a TLS350R Gauge on our tanks ('R' stands for reconciliation). Historically a tank would have a 'dip stick' which would measure the fuel. However, if this moved around (i.e. when fuel was put into the tank) then it risked rubbing against the sides of the tank causing erosion. The approach we use is to use a gauge inserted into the tank which measures the presence of water, temperature, fuel levels measured against sales. This is constantly measured. If the gauge identifies fuel leaving the tank which is not registered as a sale then an alarm is triggered.
- In addition, we also take a daily manual reconciliation in the back office computer system.
- In the unlikely scenario of a leak, the previous processes take place.

3rd Process (running simultaneously):

- To ensure complete monitoring and to ensure impartiality, we also employ Fairbanks Environmental who monitor the fuel in real time as another pair of eyes. They are a specialist wetstock monitoring company with and SIR (Statistical Inventory Reconciliation) leak detection system accredited to 9 litres per day.
- If any leaks are detected the processes listed previously are implemented.

If a leak is detected:

- 1) A vacuum tank will be on site within 1 hr.
- 2) All tanks on site are pumped (up to 2 hrs).
- 3) Euro Tank (not associated with Euro Garages) investigate the cause.
- 4) The amount of fuel lost is ascertained.
- 5) We inform the Env. Agency or NRW.
- 6) If petrol is lost we inform the Env. Agency or NRW and the Petroleum Officer.
- 7) We instruct an immediate Phase 1 and 2 Site Investigation to identify what is in the ground.
- 8) Depending on the findings of no.7 above, we apply a remediation system to extract the fuel out of the ground.

As can be seen from the above, the end operator of the site has extensive experience in dealing with below ground storage tanks and managing these properly. In addition to this, it is worth noting that Euro Garages has never had a tank fail or alarm go off in any of its new to market sites.

Given this, the use of underground storage tanks is entirely appropriate and we would be happy for a planning condition to be attached to any planning permission which requires the failsafe system identified set out within this letter to be implemented and requiring the submission and approval of underground storage tank details to be submitted as part of any reserved matters application.

Requirement 2

The submitted Geo-Environmental Report details ground investigation works that have been carried out on site along with their findings. This investigation included four window sampling boreholes within the area to be occupied by the proposed petrol filling station with three of these to a depth of 4.45m and the other to 3.75m.

Section 8 highlights that groundwater was not encountered during these site investigation works which confirms that the water table must be deeper than 4.45m from the surface.

The submitted tank details attached to this letter highlight that the storage tanks would be no more than 3.9m below ground level with a 0.25m reinforced concrete slab beneath. As such, the proposed below ground fuel storage tanks will be located above the water table.

Requirement 3

As the scheme is submitted in outline at this stage, the submitted illustrative drainage scheme is not fixed or submitted for approval. As such, this matter can be dealt with through an appropriately worded condition requiring the submission of a detail drainage scheme with any future reserved matters applications that can include this requested amendment.

I trust the above is clear and this resolves the outstanding objection from NRW. For ease of reference I have copied this response to the North Planning team at NRW.

Yours sincerely

A handwritten signature in black ink, appearing to be 'JB' with a stylized flourish.

Jonathan Burns
Associate Director
DPP

Cc. Natural Resources Wales – North Planning Team FAO Mr. Gareth Thomas

Enc. Below Ground Storage Tank Details
Fairbanks Environmental Review letter