

# Standard rules SR2021 No11

## The Environmental Permitting (England & Wales) Regulations 2016

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### Small Metal Recycling Facility (less than 5,000 tonnes)

#### Introductory note

This introductory note is a non-technical summary and does not form a part of these standard rules. Operators will need to check all of the rules in detail to ensure they can comply with them at all times.

Any standard permit issued for these rules by the Environment Agency will:

- Name a specific operator who can use the permit
- Include a site plan showing where the facility is and its extent
- Include a Fire Prevention Plan that is compliant with the requirements set out in Schedule 3 of this permit
- Require the operator to comply with these rules.

The permit allows a named operator to operate a Metal Recycling Site and permits the sorting, separation, grading, manual feed shearing, baling, compacting, and cutting (using hand-held equipment only) of ferrous metals and non-ferrous metals at a specified location.

No more than 5,000 tonnes of metal recycling waste may be accepted at the facility per year.

Burning of any wastes, either in the open, inside buildings or in any form of incinerator is not permitted.

The operations must be undertaken in accordance with the Fire Prevention Plan in Schedule 3 of this permit.

These rules do not allow any point source emission into surface waters or groundwater. However, under the emissions of substances not controlled by emission limits rule:

- Liquids may be discharged into a sewer subject to a consent issued by the local water company.
- Liquids may be taken off-site in a tanker for disposal or recovery.
- Clean surface water from roofs, or from areas of the site that are not being used in connection with storing and treating waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.

The facility must be a minimum distance from certain types of sensitive site. It cannot be within:

- 200 m of a European site, Ramsar, Site of Special Scientific Interest or Marine Conservation Zone;

- 50 metres of a National Nature Reserve, Local Nature Reserve, Local Wildlife Site, Ancient woodland or Scheduled Ancient Monument;
- 50 metres of a site that has species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity;
- a groundwater source protection zone 1 or 2, or where a source protection zone has not been defined then not within 100 metres of any well, spring or borehole used for the supply of water for human consumption. This includes private water supplies.

**End of introductory note**

**Record of changes**

Version	Date	Change
1.0	XXX 2021	New permit published

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# Rules

## 1 Management

### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- a) in accordance with a written management system that identifies and minimises risks of pollution, so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with rule 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in these standard rules shall have convenient access to a copy of the permit.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

### 1.2 Avoidance, recovery and disposal of wastes produced by the activities

- 1.2.1 The operator shall take appropriate measures to ensure that:
- a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.2.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## 2 Operations

### 2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out activities with the following descriptions:
- a) Waste activity codes for recovery:
    - R4:** Recycling/reclamation of metals and metal compounds
    - R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

2.1.2 Treatment is limited to:

- a) Sorting, separation, grading, cutting using hand-held equipment only, manual feed shearing, baling, and compacting, of ferrous metals and non-ferrous metals into different components for recovery.

2.1.3 The activities are limited as follows:

- a) No more than 5,000 tonnes of waste shall be accepted each year.
- b) No more than 100 tonnes of waste shall be on site at any one time.
- c) No more than 500kg of waste lead-acid vehicle batteries (waste code 16 06 01\*) shall be stored at the site at any one time.
- d) No more than 1 tonne of intact waste vehicle catalytic converters (waste code 16 01 21\* or 16 01 22) shall be stored at the site at any one time.
- e) The maximum quantity of hazardous waste stored at the site shall not exceed 1.5 tonnes at any one time.
- f) There shall be no treatment of batteries other than manual sorting and separating them from other wastes.
- g) There shall be no treatment of catalytic converters, including decanning, other than manual sorting and separating the catalytic converters from other wastes.
- h) Treatment for the purpose of disposal shall not exceed 50 tonnes per day.
- i) No waste shall be stored for longer than 3 years.

## 2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

2.2.2 The activities shall not be carried out within:

- a) 200 m of a European site, Ramsar, Site of Special Scientific Interest, or Marine Conservation Zone;
- b) 50 metres of a National Nature Reserve, Local Nature Reserve, Local Wildlife Site, Ancient woodland or Scheduled Ancient Monument;
- c) 50 metres of a site that has species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity;
- d) a groundwater source protection zone 1 or 2, or where a source protection zone has not been defined then not within 100 metres of any well, spring or borehole used for the supply of water for human consumption. This includes private water supplies.

## 2.3 Waste acceptance

2.3.1 Waste shall only be accepted at the site if:

- a) it does not consist solely or mainly of dust, powder or loose fibres;
- b) it is not in a form which is either sludge or liquid;

- c) it conforms to the description in the transfer documentation supplied by the producer and holder;
- d) it falls within the waste codes and descriptions given in Schedule 1 of these rules;

2.3.2 Any waste that does not comply with rule 2.3.1 shall be rejected and moved to a designated quarantine area pending removal to a facility able to accept that waste.

2.3.3 Records demonstrating compliance with rule 2.3.1 and rule 2.3.2 shall be maintained and kept for at least 2 years.

## **2.4 Operating techniques**

2.4.1 The activities shall, subject to the rules of this permit, be operated using the following techniques:

- a) all waste shall be kept secure.
- b) uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal wastes shall be stored on hard standing or an impermeable surface with sealed drainage. All other wastes shall be stored on an impermeable surface with sealed drainage system.
- c) all waste shall be treated on an impermeable surface with a sealed drainage system.
- d) lead-acid batteries shall be stored upright in containers with the electrical connectors pointing upwards. The containers shall be impermeable with an acid resistant base and, unless stored under weatherproof covering, a lid to prevent ingress of water.
- e) catalytic converters will be stored in a manner that prevents the metal casing being damaged or pierced. If the metal casing becomes damaged the catalytic converter should be either double bagged or wrapped in a minimum of 400 gauge polyethylene.

# **3 Emissions and monitoring**

## **3.1 Emissions to air, land and water**

3.1.1 There shall be no point source emissions to water, air or land – except:

- a) liquids may be discharged into a sewer subject to a consent issued by the local sewerage undertaker;
- b) liquids may be taken off-site in a tanker for disposal or recovery;
- c) clean (uncontaminated) surface water from roofs, or from areas of the site that are not being used in connection with storing or handling waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway;

## **3.2 Emissions of substances not controlled by emission limits**

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions

management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

- a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
- b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### **3.3 Odour**

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.3.2 The operator shall:

- a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
- b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.4 Noise and vibration**

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **3.5 Fire prevention**

- 3.5.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in the fire prevention plan in Schedule 3 of this permit.

# **4 Information**

## **4.1 Records**

- 4.1.1 All records required to be made by these standard rules shall:
- a) be legible;
  - b) be made as soon as reasonably practicable;
  - c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - i. off-site environmental effects; and
    - ii. matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall maintain convenient access, in either electronic or hard copy, to the records, plans and management system required to be maintained by this permit.

## **4.2 Reporting and Notifications**

- 4.2.1 The operator shall send all reports and notifications required by these standard rules to the Environment Agency using the contact details supplied in writing by the Environment Agency. Where reports and notifications must be made immediately, they may be provided verbally by telephone to the Environment Agency Incident Hotline 0800 80 70 60.
- 4.2.2 Within one month of the end of each year, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous year.
- 4.2.3 In the event:
- a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately:
    - i. inform the Environment Agency, using the Environment Agency Incident Hotline 0800 80 70 60 if the report is being made verbally,
    - ii. take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - iii. take the measures necessary to prevent further possible incidents or accidents;
  - b) of a breach of any rule the operator must immediately:

- i. inform the Environment Agency, using the Environment Agency Incident Hotline 0800 80 70 60 if the report is being made verbally, and
    - ii. take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.2.4 Written confirmation of actual or potential pollution incidents and breaches of emissions shall be submitted within 24 hours.
- 4.2.5 Following the detection of an event listed in rule 4.2.3, the operator shall review and where necessary revise the management system and implement any changes as necessary to minimise the risk of reoccurrence of the issue.
- 4.2.6 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.2.7 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- a) Where the operator is a registered company:
    - i. any change in the operator's trading name, registered name or registered office address; and
    - ii. any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
  - b) Where the operator is a corporate body other than a registered company:
    - i. any change in the operator's name or address; and
    - ii. any steps taken with a view to the dissolution of the operator.
  - c) In any other case:
    - i. the death of any of the named operators (where the operator consists of more than one named individual);
    - ii. any change in the operator's name(s) or address(es); and
    - iii. any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership; and
    - iv. any closure of the site longer than 21 days.

### **4.3 Interpretation**

- 4.3.1 In these standard rules the expressions listed below shall have the meaning given.
- "accident" means an accident that may result in pollution.



“ancient woodland” means any area that has been wooded continuously since at least 1600 AD. “Wooded continuously” does not mean there has been a continuous tree cover across the whole site. Not all trees in the woodland have to be old. Open space, both temporary and permanent, is an important component of ancient woodlands ([Natural England and Forestry Commission guidance](#)).

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(4) of that Act.

“baling” means baling that utilises a hydraulic machine that using compressive forces compacts various materials into regular-shaped dense bales (typically a cube). Bales may be belted with straps or steel wire to keep the bale in its compacted state; although for most metal bales this is not necessary. Baled scrap metal may be easier to handle, store and transport than loose scrap.

“cutting using hand-held equipment” means cutting typically utilising either an oxy-acetylene gas cutting torch or abrasive disc cutter tool to cut and/or resize large pieces of scrap metal into more manageable sizes; powder torches and plasma torches may be used to cut heat-resistant scrap (e.g. pig iron, copper, bronze).

“decanning” means cutting open the metal casing surrounding the honeycomb centre of a catalytic converter

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from emission points specified in these standard rules or from other localised or diffuse sources, which are not controlled by an emission limit.

“European Site” means Special Area of Conservation or candidate Special Area of Conservation or Special Protection Area or proposed Special Protection Area in England and Wales, within the meaning of Council Directives 79/409/EEC on the conservation of wild birds and 92/43/EEC on the conservation of natural habitats and of wild flora and fauna and the Conservation of Habitats and Species Regulations 2010. Internationally designated Ramsar sites are dealt with in the same way as European sites as a matter of government policy and for the purpose of these rules will be considered as a European Site.

“grading” means the sorting of metals to industry-agreed specifications ready for use, without the need for further treatment, by the end consumer to manufacture new metals.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“hardstanding” means ground surfaced with a durable hard material. It must be level, load-bearing, not prone to rutting or surface water ponding, and able to be kept clean of debris.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended)

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term “sealed drainage system” (below).

“pollution” means emissions as a result of human activity which may—

- a) be harmful to human health or the quality of the environment,
- b) cause offence to a human sense,
- c) result in damage to material property, or

d) impair or interfere with amenities and other legitimate uses of the environment.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“R” means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on Waste.

“Ramsar site” means a wetland of international importance, designated under the Ramsar Convention (an international agreement signed in Ramsar, Iran, in 1971). It is government policy to treat Ramsar sites the same as European sites.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- (a) no liquid will run off the surface otherwise than via the system;
- (b) except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump.

“separation” means separating wastes into different material types, components and grades.

“shearing” means utilises a range of hydraulic machinery that comprise hard steel blades which cut metals into manageable sizes. It may be hand-held, static, or attached to mobile plant (e.g. cranes). For the purposes of this permit the shear must be manual feed only.

“sorting” means sorting that may be undertaken by hand or machinery. Sorting enables materials to be processed/recycled appropriately. It may involve separation of different waste types or the separation of different metal types including:

- different ferrous metals;
- non-ferrous metals.

The sorted metals are graded by visual inspection, supplemented by chemical and other laboratory tests. The physical sorting may be assisted by conveyors and electromagnets.

“SSSI” means Site of Special Scientific Interest within the meaning of the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000).

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk. ‘List of Wastes’ means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“year” means calendar year commencing on 1st January.

## Schedule 1 Permitted waste types

<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
<b>15</b>	<b>WASTE PACKAGING, ABSORBENTS, FILTER MATERIALS, WIPING CLOTHS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
15 01	Packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging
<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 17	ferrous metal (vehicle shells must be stripped to metal only with no residual plastic, rubber or textiles)
16 01 18	non-ferrous metal
16 01 22	discarded metal components not otherwise specified
16 01 21*	hazardous vehicle components – catalytic converters containing RCF matting
16 06	batteries and accumulators
16 06 01*	lead batteries
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>
19 10	wastes from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
20 01	separately collected fractions (except 15 01)
20 01 33*	lead batteries
20 01 40	Metals

## Schedule 2      Site plans and maps

### Plan 1 – Activities at the site

Plan 1 – Site specific plan (or plans) of activities at the site. This FPP must include a site-specific plan or plans drawn to a scale that is large enough to clearly identify activities, buildings, working areas, plant and equipment that are critical to the safe operation of the site.

#### Consultation note

The Environment Agency will expect, as a minimum, the following to be shown on Plan 1:

- The layout of buildings, bays, skips and yard areas.
- The storage area(s) for wastes including the areas where the different types of wastes are stored and quantities stored in those areas.
- The area(s) where treatment activities are carried out for example sorting, separation, grading of different metals, including the areas where metals are sheared, baled, compacted or cut.
- The storage area for processed metals and quantities stored in those areas.
- The storage area for fines and non-metal waste from the waste treatment activities and quantities stored in those areas.
- Quarantine area(s) that could be used during a fire.
- Quarantine area(s) for unauthorised waste.
- The lead-acid battery storage area.
- Any areas where hazardous and flammable materials are stored on site (location of gas cylinders, oil and fuel tanks, welding and cutting gas cylinder storage areas).
- All possible ignition sources on your site e.g. cutting and welding areas.
- The location of where any fixed plant or where mobile plant is stored when not in use.
- Location of fire hydrants and/or other water supplies that will be used.
- Location of fire extinguishers, sand and other firefighting measures.
- Main access routes for fire engines and any alternative access and any access points around the site perimeter to assist firefighting.

## Plan 2 – drainage and pollution control

Plan 2 – Site specific plan (or plans) of drainage and pollution control at the site. This FPP must include a site-specific plan or plans drawn to a scale that is large enough to clearly identify all aspects of drainage and pollution control at the site.

### Consultation note

The Environment Agency will expect, as a minimum, the following to be shown on Plan 2:

- The drainage runs and manholes on the site and where they flow to.
- Any sealed sumps and interceptors (including the capacity).
- Areas of impermeable surface and areas of hardstanding
- Pollution control features such as penstocks and drain closure valves on interceptors and drainage systems.
- Areas where fire water can be contained for example bunded or kerbed areas.
- Dry ditches and watercourses that may be impacted by fire water run-off.
- Location of any discharges to foul sewer
- Location of any soakaways on site and the areas they drain – e.g. roof water soakaways.
- The surface water drains on site and adjacent to the site.
- The location any pollution control kit (for example deployable booms, sand bags, mats/covers to seal drains and any other kit you will use to contain firewater).

## Plan 3 – Sensitive receptors near the site

Plan 3 – Site specific plan of sensitive receptors within a 1km radius of the site. This FPP must include a site-specific plan or plans drawn to a scale that is large enough to clearly identify all sensitive receptors located within a 1km radius of the site that could be affected by a fire.

### Consultation note

The Environment Agency will expect, as a minimum, the following to be shown on Plan 3:

- The site location.
- A compass rose showing north and the prevailing wind direction.
- Schools, hospitals, nursing and care homes, residential, industrial and commercial areas.
- Roads, railways, bus stations, other public transport centres, pylons (on or immediately adjacent to the site), gas distribution sites, electricity substations, other utilities, airports.
- Protected habitats including [National Parks and Areas of Outstanding Natural Beauty](#), [Marine Conservation Zones](#), [Sites of Special Scientific Interest](#), [Special Areas of Conservation](#), [Special Protection Areas](#), [Ramsar wetland sites](#) (Defra MAGiC map website <http://magic.defra.gov.uk/MagicMap.aspx>).

- Ground water source protection zones <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>.

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## Schedule 3 Fire prevention plan

### 1 Introduction

Sites that store combustible wastes pose a risk from fires. Fires can cause impacts to receptors off site, for example from smoke plumes and from firewater runoff created by firefighting activities.

This fire prevention plan (FPP) sets out requirements to meet the 3 objectives of the fire prevention plan guidance. The 3 objectives are to:

- minimise the likelihood of a fire happening;
- aim for a fire to be extinguished within 4 hours;
- minimise the spread of fire within the site and to neighbouring sites.

This plan and its requirements are in addition to any fire risk assessments required by The Regulatory Reform (Fire Safety) Order 2005 or other legislation.

Further guidance on FPP can be found in Environment Agency guidance available on GOV.UK.

### 2 Management responsibilities

The permit-holder shall ensure the effective implementation of this Fire Prevention Plan (FPP). This includes:

- allocating sufficient resources to ensure the FPP can be implemented;
- ensuring site staff are trained and competent to implement this FPP;
- monitoring the overall effectiveness of the FPP through weekly site inspection and recording findings;
- ensuring that site operations are carried out in accordance with this FPP;
- regularly reviewing the FPP and revising its elements, such as staff training, to ensure that fire risks are appropriately managed;
- maintaining and reviewing a fire safety procedure, which details the specific actions that will be taken in the event of a fire on site following a fire or near-miss of a fire, if advised by the Fire & Rescue Service or the Environment Agency.

### 3 Using this fire prevention plan

#### 3.1 Testing the plan and staff training

All staff and contractors working on site must be aware of this FPP and where it is located.

Training shall be given so everyone on site knows:

- how to prevent a fire occurring;
- what they must do if there is a fire on site (including use of fire extinguishers, fire blankets, pollution prevention equipment, calling 999, evacuating affected areas etc);
- the contents of this Fire Prevention Plan;
- key people to contact.

Records of staff training shall be retained. Refresher training shall be provided on at least an annual basis, after any near miss or incident of fire on the site or where the objectives of this FPP are no longer met.

This FPP shall be periodically tested (every 6 months as a minimum) to ensure it is fit for purpose and is adapted to meet any changes in the operation of the site.

Site staff must immediately report to senior management any activity or events, including near misses, which could increase the risk of fire on the site.

### **3.2 Record-keeping**

All checks required by this FPP shall be recorded and kept available for inspection by the Environment Agency (for example, in the site diary or management system records).

## **4 Site plans and maps**

The three plans specified in Schedule 2 form part of this permit and this fire prevention plan. The site activities shall be operated in accordance with these plans, unless otherwise agreed in writing by the Environment Agency.

The plans shall be reviewed and updated if the activities carried out on site, the site layout, or the drainage and pollution control measures change.

As a minimum the sensitive receptor plan(s) shall be reviewed every 12 months to ensure they accurately reflect the nearby sensitive receptors.

## **5 Types of combustible materials stored on small metal recycling sites**

The following are the common types of combustible wastes and materials that could be stored at small metal recycling sites.

### **5.1 Combustible wastes**

Combustible wastes include:

- Batteries
- Oily rags
- Non-permitted wastes received as part of a metal load (for example, but not limited to, wood, plastic, paper, or rubber)
- Residual non-metal materials that result from processing metal wastes. (Including, but not limited to, wood, plastic and paper)
- Oil or grease contaminated metals, painted metals and oil containing parts
- Waste oils, oily rags and oil filters (for example from vehicle and plant maintenance)
- Combustible office wastes (for example, but not limited to, paper, plastic and card)

### **5.2 Other combustible materials associated with small metal recycling facilities**

Other combustible materials associated with small metal recycling sites include:



- Welding or cutting gas cylinders,
- Oil and fuels
- Combustible office and site materials (for example, furniture)

## 6 Common causes of fire at small metal recycling sites

The following are the common causes of fires at small recycling sites.

- batteries short circuiting and causing a fire
- sparks from cutting, shearing and hot works
- smoking
- arson
- poor storage of oils and fuels
- electrical faults
- oily rags stored in direct sunlight
- acceptance of unauthorised wastes

## 7 Measures to prevent and reduce the risk of fires at small metal recycling sites.

The following sections contain the measures and requirements that shall be put in place to prevent the common causes of fires set out in section 6 above.

### 7.1 Acceptance and storage of batteries

There is a risk of short circuits and fire if batteries are damaged, allowed to get wet, or the terminals come into contact with other terminals. To minimise the risk of fires caused by batteries the following procedures shall be put in place:

- When accepted onto the site all batteries, and loads of batteries, shall immediately be checked to confirm they are lead-acid.
- **Any batteries that are not lead-acid** shall either be:
  - immediately rejected; or
  - if found within a load accepted on to site, they must be segregated and placed in the designated battery quarantine area. Any quarantined batteries shall be removed to a suitably permitted facility as soon as practicable, and no later than 1 month from the date when they were accepted onto site.
  - **If the quarantined batteries are lithium primary or lithium ion batteries**, they must be removed within 5 days from the date when they were accepted on site.
  - Records of the quarantined battery removal off site shall be maintained.
- All lead-acid batteries must be stored upright in acid resistant container(s) that prevent leaks and damage to batteries stored within them. The container(s) must

be either lidded to prevent water entering, or stored in a clearly designated area under cover to prevent water entering the container.

- Any spillage of battery acid must be neutralised and cleared immediately.
- Sand or neutralising granules must be kept available at all times in the battery reception and storage areas to deal with leaks and spills.
- Fire extinguishers and/or sand must be available for use at all times adjacent to the battery storage container(s). The fire extinguishers must be maintained in accordance with the manufacturer's instructions and replaced when necessary.

## **7.2 Hot works safe working practices**

For the purposes of this fire prevention plan 'hot works' are welding, cutting and shearing activities. Hot works could ignite combustible materials so the following measures and procedures must be in place:

- All welding and hot cutting activities shall be carried out in accordance with the documented hot works safe working practices.
- Staff and contractors working on site shall be trained and made aware of the hot works safe working practices. Records of training shall be maintained at all times.
- Regular checks shall be made for smouldering during welding, cutting or shearing works.
- Hot works shall only be carried out in a designated location at least 6m away from areas where oils, fuels and combustible materials are stored.
- No hot works shall be carried out within 30 minutes prior to operations ceasing on the site. Checks shall be made in the hot work areas for smouldering and hot spots prior to the site closing.
- No hot works shall be carried out near vegetated or grassed areas during hot and dry weather periods.
- Gas cylinders shall be stored within a secure cage when not in use away from sources of ignition. They must be stored in accordance with the latest Health and Safety Executive guidance.
- Checks shall be made on all tanks or containers that are being cut, baled or sheared to ensure they are empty. Where appropriate they shall be purged prior to cutting, shearing or baling them.
- Fire extinguishers, sand, or other means of extinguishing fires shall be situated adjacent to the cutting, welding or shearing areas. The fire extinguishers must be maintained in accordance with the manufacturer's instructions.

## **7.3 Discarded smoking materials and other ignition sources**

In addition to the hot works safe working practices in section 7.2, the following additional measures shall be put in place to prevent fires on the site caused by other ignition sources.

- To prevent accidental fires caused by smoking materials:
  - No smoking on the permitted area of the site.
  - The no smoking policy and provisions for smokers must be clearly communicated to all visitors and staff.

- No burning of any kind of material shall be allowed on the site.
- Any heaters used on site should be placed at least 2 metres from combustible waste or combustible material.

## **7.4 Arson**

To prevent unauthorised entry and the potential for arson there shall be site security measures in place, including but not limited to, the following:

- Locked building(s) and lockable gates with a perimeter fence;  
or;
- Perimeter fencing and lockable gates, where there is no building.
- The perimeter fencing and buildings shall be inspected for damage on a daily basis. Any damage or evidence of attempted entry must be repaired immediately and a record kept.
- CCTV and intruder alarms which are responded to both during working hours and out of hours. A list of contact details and who will respond out of hours shall be maintained.
- Security lighting either passive infrared sensor (PIR), or traditional lighting shall be installed and maintained.

## **7.5 Leaks and spillages of oils and fuels**

To minimise the risk of fire the following actions shall be taken:

- Any build-up of oil, and debris in or around plant and equipment must be cleared as soon as practicable but no less than weekly.
- All plant, machinery and equipment must be regularly inspected, serviced and maintained in accordance with the manufacturer's instructions.
- All oil or fuel spills must be cleared up immediately.
- The spill kit(s) must contain as a minimum:
  - Oil and chemical absorbent pads or granules
  - Sand
  - Clay mats and drain blockers
  - Leak sealing putty for leaking tanks/containers
- Staff must be trained to use the spill kits and clear up any absorbents that have been used.
- Spill kits must be checked and replenished on a regular basis to ensure that the spill kit is ready for use at all times.

## **7.6 Electrical faults including damaged or exposed electrical cables**

Fires can be caused by electrical faults within plant or equipment. To minimise the risk of fires the following measures shall be in place:

- Electrical equipment and electrical installations on site must be fully certified by a suitably qualified person and written procedures must be in place that set out regular maintenance.
- Electrical equipment must be tested in line with the Electricity at Work Regulations 1989.
- All plant and machinery and electrical equipment used on site shall be checked for damage before use and at least on a weekly basis. These checks must include identifying damaged or exposed electrical cables. Further guidance on checking and maintain electrical equipment can be found on the HSE website.
- Damaged electronic and electrical equipment must not be used until repaired.
- All electrical appliances must be turned off when the facility is not in use.
- All portable electronic equipment must be unplugged at the end of the working day.
- Batteries and power tools must not left charging overnight, or when the site is not manned.

## 7.7 Dealing with hot weather and self-heating from sunlight

To reduce the risk of self-combustion:

- Oily rags must be stored in containers out of direct sunlight to prevent self-ignition. They must also be stored away from heat sources. Containers must be monitored for heat build-up.
- No hot works or cutting shall be carried out near vegetated or grassed areas during hot and dry weather periods.
- Fuel storage tanks and mobile fuel storage tanks must be shaded from direct sunlight.

## 7.8 Waste acceptance procedures

Only metal wastes listed in Schedule 1 to this permit shall be accepted. These metal wastes must not be contaminated with other non-metallic wastes (contrary materials) which would potentially increase the risk of fire and pollution. The following measures shall be put in place to reduce the risk of fire:

- Robust waste acceptance and rejection procedures to avoid receiving unwanted items.
- If waste is accepted from third parties they must understand only wastes listed in schedule 1 to this permit can be accepted.
- Loads containing contrary materials, including but not limited to, wood, plastic, paper, rubber, containers that are not empty or pressurised cylinders shall be rejected.
- If waste is collected, the load must be checked before it is removed to ensure it does not contain contrary materials. If it contains contrary materials it shall be rejected, or the contrary materials removed at the producer site.
- Any incidental materials that are found in loads of metal wastes when they are tipped shall be separated from the metal wastes.
- These incidental materials and any residues from the processing of metal wastes shall be stored on an impermeable surface with sealed drainage either in a container, or a

designated bay. This area must be sited a minimum of 6 metres away from the wastes that are being stored and processed in accordance with the permit.

- These incidental materials and residues shall be removed from site and taken to a suitably permitted facility at least once a month, or before the quantity reaches 3m<sup>3</sup> whichever is the soonest.
- If the incidental materials are lithium primary or lithium ion batteries, they must be removed within 5 days from the date when they were accepted on site

#### 7.8.1 Unauthorised batteries

- If any batteries other than lead-acid batteries are discovered in, or amongst a load, they shall be immediately segregated from the waste and stored so that they cannot be damaged in a lidded water-tight container, or in a container within a building.
- Unauthorised batteries shall be removed from site and taken to a suitably permitted facility at least once a month.

If the unauthorised batteries are **lithium primary or lithium ion batteries** they present a greater fire risk than other batteries. Fires can start if the battery is:

- damaged,
- exposed to moisture, and/or
- exposed to high temperatures.

To prevent fires occurring any battery that is, or is suspected to be, a lithium or lithium ion battery, shall be checked for damage and stored in a watertight, lidded container filled with sand or vermiculite. The container shall be capable of protecting the battery or batteries stored within it from damage.

- This container shall either be located at least 6 metres away from any buildings, plant equipment, waste or combustible materials.
- If the 6 metre distance cannot be achieved the battery container shall be stored within a fire resistant enclosure.
- The storage locations shall be shown on the plan in schedule 3.

These batteries shall be removed from site as soon as practicable, or at the latest within 5 working days.

## 8 Managing waste piles and storage areas

### 8.1 Waste storage

This permit includes some tonnage restrictions including:

- No more than 100 tonnes of waste shall be stored on site at any one time. This waste may be stored in containers, bays, or piles. Containers shall be accessible from at least one side to enable firefighting.
- Non-ferrous metal, catalytic converters and lead-acid batteries may additionally be stored in buildings.
- Within the 100 tonnes; no more than 500kg of lead-acid batteries and no more than 1 tonne of catalytic converters shall be stored at any one time.

- Batteries shall be stored separately from other waste. Fire extinguishers and/or sand should be available adjacent to the battery storage container(s).

## 8.2 Separation distances

All combustible wastes must be stored a minimum of 6 metres from the following areas:

- Buildings;
- Gas cylinder storage cages; and
- Fuel storage areas.

Combustible waste shall not be stored within:

- 10 metres of high voltage power lines
- 10 metres of a boundary with a railway line or motorway.

## 9 Prevent fire spreading

### 9.1 Procedure to remove materials if there is a fire

Where safe to do so, waste and materials not involved in a fire shall be removed from the vicinity of any fire to prevent fire from spreading.

### 9.2 Moving containers in a fire

In the event of a fire and if necessary, containers shall be moved to improve access to the firefighting area. Containers shall be accessible from at least one side to enable firefighting.

## 10 Detecting fires

There shall be systems in place to detect fires both during working hours and out of working hours and the following measures shall be in place:

- A 'fire watch or check' shall be undertaken at the end of each working day as well as checks made during the hours of operation. See section 7.2 on hot works
- CCTV and intruder alarm shall be monitored and responded to both during working hours and out of hours. An up-to-date list of contact details and who will respond out of hours must be maintained.
- A fire detection and alert system(s) must be in place. These must operate both within and out of working hours.

## 11 Suppressing fires

The following measures shall be in place:

- Site staff shall know what equipment is available on site to suppress a fire and shall be trained in the use of the available equipment.
- Fire extinguishers and/or sand, or other suppression measures shall as a minimum be located in:
  - battery storage area
  - the cutting, welding, baling, shearing areas and

- the unauthorised waste quarantine storage areas
- Where waste is stored in a building or buildings, water supplies and fire extinguishers shall be available to tackle a fire in the building(s).
- As detailed in section 13 there shall be water supplies on site which are available to tackle a fire.
- Plant and equipment shall be available to move waste and other materials away from a fire, if safe to do so.

## 12 Firefighting techniques

In the event of a fire during operating hours:

- The site must be immediately closed and cease accepting waste.
- The Fire and Rescue Service shall be notified.
- If safe to do so, a small fire may be tackled by site staff.
- Mobile plant and vehicles shall be moved from the areas adjacent to the fire to prevent the fire spreading and escalating.
- Where safe to do so, waste and items adjacent to the fire shall be moved to isolate the fire and minimise the amount of combustible materials and waste involved in the fire.
- Any drains on site shall be sealed off using clay mats and/or drain blockers.
- Fire water shall be prevented from leaving the site and/or entering ditches and roadside drainage systems.
- The site shall remain closed to waste acceptance until declared safe to reopen by the emergency authorities.

## 13 Water supplies

The available water supply required is 138,600 litres of water. One of the following water sources must be available for the site:

- hydrant conforming to British Standard 750 or equivalent, located within 100 metres of the site access and maintained by the Fire and Rescue Service or other competent maintenance organisation,  
and if no available hydrant:
- water is available on site in a tank or other storage facility of not less than 20,000 litres. The coupling on the tank must be agreed with the local Fire and Rescue Service as compatible with their equipment. This tank or storage facility must be checked at least once a week to ensure it is holding 20,000 litres.

## 14 Managing fire water

You must ensure that fire water is contained and prevent it from reaching sensitive receptors or causing pollution. In a worst-case scenario this could be up to 138,600 litres of water. Fire water shall be contained using a combination of:

- Impermeable pavement, kerbing and areas of sealed drainage.

- Sandbags, polybooms or other equipment that can be used to contain firewater to within the site.
- Drain blockers and clay mats to protect drainage systems to surface water and foul sewer (unless the water company has agreed in writing that firewater from the site can be discharged to the foul sewer).
- A tanker company must be contracted with 24/7 callout arrangements to recover firewater from contained areas and the drainage system.

## 15 During and after an incident

### 15.1 Clearing, decontamination and making the site operational after a fire

Following a fire and before any waste is accepted on to site the following actions shall be carried out:

- Any waste burnt during a fire shall be removed from site and disposed of at a suitably authorised facility.
- Contaminated water within the drainage system shall be sampled, removed from site and taken to a suitably authorised facility.
- The site hardstanding, impermeable pavement and sealed drainage system shall be inspected for damage and contamination. Any damage shall be reported to the Environment Agency regarding sampling and further investigation.
- Any areas of hardstanding, impermeable pavement or sealed drainage that are damaged shall be repaired prior to receipt of waste on the site.
- If any waste containing persistent organic pollutants (POPs) is involved in a fire, residues from that fire and the firewater may contain POPs and must be treated in accordance with the [POPs Regulations](#).
- The cause of the fire shall be investigated and any lessons learnt and improvements made to site procedures shall be documented, communicated to all site staff and implemented.

**End of standard rules**