



# Fire Prevention Plan

IES Oldbury Version 8

## 1.2.1.4 Fire Prevention Plan

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As per acceptance procedure (detailed in section 2.2.2) – waste movements are recorded in strict compliance with applicable waste legislation and associated Duty of Care (DoC) requirements.

Internally, waste movement is recorded onto the Oldbury facility in accordance with EPP-1.1 Waste Acceptance – The Duty of Care Acceptance of Incoming Material (see Appendix 8). IES Oldbury is permitted to receive shredded mixed WEEE and raw cable as well as outgoing hazardous waste such as oil/chemical waste. Movement of hazardous waste is subject to separate specific legislation and will be documented on appropriate Hazardous Waste Consignment Notes (HWCN). Internal guidance will be followed as detailed below: EPP-1.4 Completing of Hazardous Waste Consignment Notes (see Appendix 10) ..... 12

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### Fire Prevention Plan – IES Oldbury

#### Introduction

In line with Environment Agency (EA) Fire Prevention Plan (FPP) Guidance, this document has been generated to focus on aspects of fire prevention and appropriate fire response, and aims to facilitate the prevention of fires and for a fast and effective response in any waste fire emergency.

#### Fire Prevention Plan - Objectives

This document forms part of the site's Environmental Management System (EMS) held on site and intended to satisfy EA requirements as a 'standalone' and specific FPP with regards to waste activities at the IES Facility. This FPP aims to meet the following objectives:

- 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

Where IES fails to meet strict FPP criteria in meeting the objectives laid out above, suitable 'alternative measures' will be demonstrated with the aim of meeting these objectives (see section 1.5 below).

### Section 1 – The Site

#### 1.1 Location of Site/Community/Sensitivity

The site is bound on 2 sides by surface water features. To the north the Birmingham Canal is located. To the south-west the Gower Branch Canal, branching off from the Birmingham Canal, borders the site for a short distance. The River Tame then passes under the Gower Branch Canal and borders the site for the rest of the south-western boundary. The nearest dwellings to the site are located on Whitgreave Street (120m from northern boundary), Theodore Close (200m from southern boundary) and Palmerston Drive (285m from the western boundary). See Appendix 2 for further information on sensitive receptors.

#### 1.2 Site Activities

The feed waste to the mechanical process is a number of wastes containing non-ferrous metals, particularly copper that needs intensive mechanical processing to liberate and separate the metallic value that they contain.

These can be summarised as follows –

The existing mechanical process, processes '**Mixed Waste**' is typically made up of Plastic coated copper wire, Stainless steel, Aluminium, Iron & steel, Rag, Foam, Plastic, Rubber, Inert grit and glass - the proportions of which will vary depending on the preceding waste treatment processes and the original type of waste. This waste feed will principally be derived from the recycling of metal containing wastes such as depolluted end of life vehicles, large domestic appliances and similar post-consumer products. Following initial shredding, a concentrate of plastic coated copper wire (together with other materials as described above) is produced from the further processing of the shredder heavy and light fraction wastes. As such, all of the following EWC codes in Table 1 are potentially applicable to this 'mixed waste'

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Table 1: Material to be processed by the existing mechanical processes

	EWC Waste Code	EWC Description of waste	Further description
1.	19 10 04	Fluff-light fraction and dust other than those mentioned in 19 10 03	-
2.	19 10 02	Non-ferrous waste [from shredding of metal-containing waste]	-
3.	19 12 03	Non-ferrous metal [from the mechanical treatment of waste]	-
4.	19 12 12	Other wastes (including mixtures of materials) other than those mentioned in 19 12 11 [from the mechanical treatment of waste]	19 12 11* or 19 12 12 consisting only of waste from the processing of wastes from the shredding of metal-containing wastes.
5.	19 12 11*	Other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances.	
6.	19 02 04*	Premixed wastes composed of at least one hazardous waste.	19 02 04* - consisting only of shredded mixed WEEE.
7.	16 02 15*	Hazardous components removed from discarded equipment	-
8.	16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15	-
9.	17 04 10*	Cables containing oil, coal tar and other hazardous substances	- Added as part of this variation
10.	17 04 11	Cables other than those mentioned in 17 04 10	- Added as part of this variation

Table 2: Material to be processed by the new mechanical processes (being added as part of the current permit variation)

	EWC Waste Code	EWC Description of waste	Further description
1.	16 02 15*	Hazardous components removed from discarded equipment	"Raw Cable" (i.e. finished form for electrical uses / installation) categorised in various forms e.g. Low grade armoured high grade cable, telecom cable – poly-poly, drop wire, paper curse.
2.	16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15	As above.
3.	17 04 10*	Cables containing oil, coal tar and other hazardous substances	As above.
4.	17 04 11	Cables other than those mentioned in 17 04 10	As above.
5.	19 12 03	Non-Ferrous Metals	As above.

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### 1. AREA 01: Raw cable.

This area will receive incoming material from other EMR sites. It will be pre-sorted via manual means to remove objects that could affect the pre-shredder. Storage and preparation area (Area 01 as seen in appendix 1).

*Ref to table 02 for the EWC codes that will be used for this process.*

### 2. AREA 02: Primary, Secondary, Tertiary Granulation

The pre-sorted material that's been prepared by Area 01, will be moved via a FEL or forklift bin to the granulation in feed hoppers.

The pre-sorted product will be fed into the supper chopper (**Primary**) via a grab to achieve the sizes reduction required and discharged onto a vibrating feeder whereby the ferrous will be removed via an over-band magnet, and the nonferrous will be conveyed into 4 storage bays or directly into the feed hopper of secondary plant.

This comprises the following steps:

- The raw cable will be fed via a grab into the shredder's inlet hopper above the shredder.
- The shredder can reduce the material between 200mm -12mm. Typical set point for us is 25mm.
- The material will be discharged via a vibrating feeder which is installed underneath the shredder.
- An Over-band magnet will be installed at the discharge end of the feeder to recover the ferrous pieces out of the product. The ferrous will be collected in 1m<sup>3</sup> bin and tipped into a roro skip to be sent to the ferrous sites.
- The copper product will be either discharged into bays or Roro skips for batching processes from the conveyor belt.

The Ferrous metals separated by the primary stage will be removed from site for further processing elsewhere to recover materials for recycling. The prepared copper wire will then be processed over Area 02 (granulation and pre shredded material storage) as seen in appendix 1)

**Secondary & Tertiary:** The product will be discharged into the hopper and conveyed to the secondary shredder this will reduce the material to desired sizes for example -12mm. The material will be discharged via a vibrating feeder which is installed underneath the shredder. An over-band magnet will be installed at the discharge end of the feeder to recover the ferrous pieces out of the product. The ferrous will be collected in 1m<sup>3</sup> bin.

The -12mm copper wire will then be conveyed indirectly into the tertiary shredder that will reduce the product to -8mm. The material will be discharged via a vibrating feeder which is installed underneath the shredded and an over-band magnet will be installed at the discharge end of the feeder to recover the ferrous pieces out of the product. The ferrous will be collected in 1m<sup>3</sup> bin. The -8mm copper wire will then be conveyed indirectly into the Quaternary shredder that will reduce the product to the final copper sizes, mixed with the plastic.

The -4mm material will be conveyed to the separation plant that will remove the heavies and lights from each other. Heavies (Copper product) and Lights is the by-product plastic (waste).

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### 3. AREA 03: Separation Unit

After Granulation, the liberated metals and heavier plastics are moved to the Separation stage by loading shovel or forklift bin.

The separation unit comprises the following steps:

- Tipping into a feed hopper,
- Screening into different size ranges,
- A Magnet removes any ferrous metals,
- Dry density separation of the remaining waste and light metals from heavier metals is undertaken to produce clean saleable copper and aluminium granules.
- The waste is discharged by enclosed conveyor to covered hook-lift containers, located outside the building prior to removal from site once full. The metal products are discharged into bulk bags and stored securely within the building prior to being loaded by forklift onto artic trailers for delivery to customers.
- Secondary separation plant could be installed either to separate the PVC and PE into by products via a dry/wet process.

If the customers require plastic products, it will be diverted to the drying plant for further processing.

### 4. HALL 04

WWAS2 (19-12-12 wet landfill). This material arrives in hall 4 from EMR Oldbury's facility VIA conveyor belt. Maximum pile should not exceed 1250m<sup>3</sup>. The material is rotated frequently with loads sent out from the hall on a daily basis.

## 1.3 Layout/Infrastructure

The development is located adjacent to the Anglo-African Industrial Estate on Union Road in Oldbury, Northwest of Birmingham. The entire development occupied by IES and EMR Oldbury is roughly triangular and measures approximately 8.7 hectares. As seen in Appendix 1, IES forms the Eastern portion of the development. The National Grid reference for site is: SO 98291 90887.

## 1.4 Types of Combustible/Flammable Materials

The site primarily accepts mixed waste, Small Mixed WEEE (SMW), Cable from electrical and electronic equipment and raw cable accepted from other EMR sites. The site accepts scrap with limited combustibility risk. Potentially combustible/flammable wastes can be found detailed in section 1.4.1. Other types of combustible/flammable materials on site are detailed within section 1.4.2 and where applicable in the site emergency plan. The storage locations of potentially combustible/flammable materials are detailed within Appendix 1.

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### 1.4.1 Combustible/Flammable Waste

The site accepts mixed waste, small Mixed WEEE (SMW), Cable from electrical and electronic equipment and raw cable, initially transported to the facility by road from other EMR sites. Various sites provide treatment prior to material arriving at site which includes separation from other materials and ensuring the materials are free from contaminants such as oils, and where dusts / fragments are minimised.

Strict acceptance procedures ensure that incoming waste is either rejected or quarantined pending removal from site.

**Existing plant:** The feed waste stockpile location is for direct raw material in-feed for the mechanical process.

The Pre Chop raw feed bays can hold a maximum of 1250m<sup>3</sup> (**All the bays together will summate to 1250m<sup>3</sup>**). The feed for the process will be approximately 480m<sup>3</sup> per day 24/7 with a density of 0.3 (144 tonnes). With the prospective speed of process in mind. The Pre Chop raw feed bays are unlikely to meet their limits of 1250m<sup>3</sup>. In effect, the combination of the bays for the single material of feed waste will reduce the risk of fire since the turnover will be done at a much quicker rate.

#### **New Granulation plant:**

Un-processed cable will be stored at an outside demarked location of approximately 1123m<sup>2</sup> at an estimate of 375 tonnes. This material will be fed into the pre shredder and then transported by mechanical means into outside storage bays, approximately 200m<sup>2</sup> at an estimate of 67 tonnes.

The estimated pre shredded holding capacity, will be on average 148 tonnes with a maximum of 210 tonnes.

#### **Oil Waste (Plant Maintenance Activity)**

Oil waste is produced as part of any plant maintenance activity and is not accepted inwards as waste imported waste stream. All oil wastes are stored in an intermediate bulk container and conform to applicable legislative requirement. Storage location can be seen within Appendix 1.

#### **Oily Rags**

Produced on site due to ongoing plant and other maintenance activity Oily rags are stored within a secure container awaiting removal off site to an authorised facility. Storage location can be seen within Appendix 1.

#### **Wood Waste**

Wood waste may be discovered during the waste acceptance process. The site may also from time to time receive goods (such as machinery parts on pallets). All other wood waste which tends to be of very low quantity, is stored away from other flammable substances and combustible wastes. Wood storage will be accessible at all times. Storage location can be seen within Appendix 1.

### 1.4.2 Other Combustible/Flammable Materials

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### Oil Storage (Various – Fixed/mobile plant/Vehicle Maintenance)

Oil product (in various forms) is kept on site for all plant maintenance activities. Oil is stored at the designated bunded oil storage area, as required by applicable Oil Storage Regulations. See Appendix 1 for its location.

### Bulk fuel for plant/equipment

A 10,000 litre fuel tank (Diesel Oil) is stored on site for the refuelling of IES mobile plant and all plant related activities on site. The tank is integrally bunded as required by applicable Oil Storage Regulations. See Appendix 1 for its location.

### Gas Bottles/Cylinders

The site does not have production burning activities; fabrication and welding activities take place as required. Gas cylinders, mainly oxygen and propane are stored upright in separate lockable cages outside when not in use. Minimum quantities are kept on site. Empty/Waste gas bottles/cylinders are stored in designated cage awaiting appropriate disposal as required. See Appendix 1 for all cylinder storage locations.

## Section 2 – Preventing Fire

### 2.1 Pile Sizes/Volumes

#### 2.1.1 Preventing Fire - Table 1

Bay/ material location	Material type	Storage method	Max cubic metres stored	Max duration on site	Comments (including combustibility)
Existing Mechanical Process					
1	Metal	Stockpile	450m <sup>3</sup>	21 Days	Non-combustible
2	'Mixed Waste'	Stockpile	1250m <sup>3</sup>	3 days	Combustible
External bays post process	Unable to grind, Separation Ali, Separation Ferric, Zorba, Ferric, Fines, Water Storage area	Multiple legato bays	45m <sup>3</sup> X 6 legato bays	2 days	Non-combustible

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*Waste container stations	Waste of process due for landfill	Hook-lift containers	30m <sup>3</sup> each container (x 4 containers)	2 days	Combustible  From grinder and air tables
New Mechanical Processes (2022)					
Raw Cable storage area	Raw Cable	Stockpile	1250m <sup>3</sup> Raw cable (575 tons).  Planning for 1000m <sup>3</sup>  650 m <sup>3</sup> Pre shredded cable (167 tons)	4 days  Continues flow of material.  First in first out	Combustible
Plastic as waste	Plastic (if Waste for disposal to landfill)	Hook-lift containers	Max 15* 30m <sup>3</sup> units.  30 m <sup>3</sup> each container(72ton per day(30*0.49.=14.7 * .8=11.76 {72/11,76 =6 skips per 24 shift	2.5 days	Combustible
Plastic as by products.	Plastic (if by-product suitable for sale)	Bulk Bags	2m <sup>3</sup> each bag (998kg) 72ton per Shift  (180 bags)	2.5 days	Combustible
Copper storage area	Copper	Bulk Bags	1.25 tons per bag ( 46 bags per shift) 36.8 m3	800 bags pm	Non-combustible
Light waste	e.g. Filter waste - discharged from cyclone/bag filters	Hook-lift containers	Max of 5 units.  30 m <sup>3</sup> each container (14.4t per day)  2 roro skips per	2.5 Days	Combustible

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			shift		
Hall 4	WWAS2	Stockpile	1250m <sup>3</sup>	2 Months	Combustible

## 2.2 Waste Management Methodology

### 2.2.1 First in/First out (FIFO)

Natural rotation of materials occurs as the stock is depleted during the working day and when deliveries come in. When material arrives, the Weighbridge Operative will direct the vehicle to IES area 3 where they will be instructed by the responsible operator at the area to proceed and tip. Material is processed continually and will not be stored at the area for any longer than 3 days as new material continues to be tipped, inspected and added to the process feed. See Appendix 6 for more information on stock rotation.

### 2.2.2 Acceptance

There are two methods of waste delivery and acceptance on to the site.

#### By covered vehicle: Feed waste (loose)

Delivered directly to Area 3. These incoming loads are from other EMR / AATF sites only and enter site through the weighbridge where the driver receives written information on where to tip their material. Once the artic has driven to Area 3, an operative will marshal the reversing trailer into the designated bay and monitor the material as it is tipped.

All waste material accepted into Oldbury will also be in accordance with relevant Environmental Protection Procedures (EPP):

EPP-1.1 Waste Acceptance – The Duty of Care Acceptance of Incoming Material (see Appendix 8)

EPP-1.2 Waste Acceptance – Inspection of Incoming Material (see Appendix 9)

EPP-1.6 Waste Acceptance – Identification of Radioactive Items (see Appendix 11)

EPP-1.7 Waste Acceptance – Identification of Explosive Materials (see Appendix 12)

### 2.2.3 Rejection of Waste Material

The facility will accept a number of waste streams. These relate to outputs from shredders namely fluff light fraction, non-ferrous frag waste fractions and other wastes from the mechanical treatment of waste. Should the highly unlikely ever happen, non-conforming waste will be rejected at the weighbridge/initial inspection stage so this can be loaded back onto the supplier's vehicle. This avoids any unnecessary storage of combustible and/or non-permitted material on-site.

IES's material acceptance and inspection procedures will be in operation. Material will be tipped Approximately 2 meters from the stock pile to ensure it does not mix with material already accepted on site and so it can be visually inspected. Inspection of the waste is undertaken at the weighbridge and during the unloading/loading of the vehicles by the loading shovel drivers.

Records of non-conforming wastes and associated disposal paperwork shall be kept on site.

All waste material rejection procedures will be in accordance with relevant Environmental Protection Procedures (EPP):

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- EPP-1.8 Waste Acceptance – Rejection of Waste Material (see Appendix 13)

Loads will be inspected via the CCTV camera and radiation detectors. The driver will be informed of the reasons for the rejection and a waste rejection form completed and note made in the site diary. Waste will be rejected from the site or transferred directly into our landfill heap. The rejection will be recorded on to the event log supported by a root cause and any appropriate actions to help prevent reoccurrence and to continuously improve how we react to and manage these situations.

### 2.2.4 Treatment

Treatment processes on site are designed to retrieve material from metal containing wastes such as depolluted end of life vehicles, large domestic appliances, similar post-consumer products and small mixed WEEE delivered to site. Treatments on site are designed to ensure that resulting materials are in compliance with strict criteria in quality of material required in customer specification, whereby regular quality checks are undertaken. There are a number of separation processes i.e. the pre-chop line, grinder separation line, air separation line and granulation line. These all include forms of shredding, vibratory screens, air sifters, magnetic separation, granulator, separation tables etc. Materials are transported between processes using various conveyor belts and different types of mobile plant i.e. fork lift truck, tele-handler with bucket attachment and 360 materials handler. Air flow is used at various stages in the processes, in the separation of materials, in the transport of materials and for the collection of dust. Waste materials are produced at different stages and will either be discharged to bulk bags and bins within the building or will be discharged by enclosed conveyor to covered hook lift containers, located outside the building prior to removal from site once full.

### 2.2.4 Recording Waste Movement

As per acceptance procedure (detailed in section 2.2.2) – waste movements are recorded in strict compliance with applicable waste legislation and associated Duty of Care (DoC) requirements. Internally, waste movement is recorded onto the Oldbury facility in accordance with EPP-1.1 Waste Acceptance – The Duty of Care Acceptance of Incoming Material (see Appendix 8). IES Oldbury is permitted to receive shredded mixed WEEE and raw cable as well as outgoing hazardous waste such as oil/chemical waste. Movement of hazardous waste is subject to separate specific legislation and will be documented on appropriate Hazardous Waste Consignment Notes (HWCN). Internal guidance will be followed as detailed below: EPP-1.4 Completing of Hazardous Waste Consignment Notes (see Appendix 10)

## 2.3 Materials/Waste Storage Management

### 2.3.1 Duration

Also refer to Section 2.1.1 – Table 1.

Infeed material is delivered to and stored in Area 3 for no longer than 3 days by which point the material will have been fed into the process and new material would have been delivered allowing for a constant rotation of waste. However this number may change if there are breakdowns or transport issues. Storage times for processed materials are dependent on sales and may therefore be stored at the designated bag storage area for longer periods of time. See Appendix 1 for details on the storage of processed material. Natural rotation of materials occurs as the stock is depleted during the working day and deliveries come in. The average storage period is no longer than 3 days for mixed waste and 4 days for raw cable. The stock is checked daily and new stock is ordered by set times for the following day

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(refer to stock control SOP in appendix 6 and section 2.2.1 First in first out). If the in feed material is to be stored for a longer period of time, it will be monitored visually by operatives who are present 24/7. Thermal cameras can also be used to monitor this area. Security guards are on site between 18:00-06:00 every day and throughout the weekend when they are regularly monitoring the area.

### 2.3.2 Stock Rotation

This requirement can be ignored since infeed stock will be processed on a regular basis.

### 2.3.3 Waste Bale Storage

IES Oldbury does not store baled waste.

### 2.3.4 Storage where maximum pile limits don't apply (ELV)

Ignore this requirement.

### 2.3.5 Waste Stored in Containers (Types/Accessibility/Ability to move)

#### Waste Oils

Waste oils from fixed and mobile plant maintenance will accumulate over time. Waste oil IBC's/containers will be contained in such a way as to prevent leaks or spillages, and the storage and disposal of waste oils will be carried out in accordance with the Environment Agency guidance.

#### Oily Rags

Oily rags are stored in secured container. This container will be accessible from all sides and easily relocated in the event of any fire emergency.

#### Office Waste (General Waste)

Minimal quantities of office waste will be stored in designated bins. These bins will be accessible from all sides and be positioned away from any other combustibles.

## 2.4 Managing Common Causes of Fire

### 2.4.1 Managing Common Causes of Fire - Table 2

Managing Common Causes of Fire	
Risk	Control Measure (if required)
Arson	The site is secured by 8ft metal fencing. The entry gates on Union Road are kept locked from 1800-0600 each day. Security guards patrol the site from 1800-0600 each day. In the case of a fire, a security alert is immediately sent to the depot manager. The site also benefits from 24-hour CCTV with thermal imaging (with the ability to monitor body heat movement). Outside of operating hours the sites CCTV system is monitored by a remote security contractor. These security measures will ensure any potential for arson on-site is prevented.
Plant/Equipment	All operational mobile and fixed plant is maintained and inspected by a competent person and all records of inspections and maintenance schedules are kept on site in the main offices. All plant and equipment on site have an associated documented safe working procedure (SWP) and prescribed maintenance schedules. Mobile plant available on site consists of tele handlers with bucket attachment, fork lift trucks and MEWPs (mobile elevated work platforms). Mobile plant will be stored at the designated mobile plant storage are when not in use and during maintenance or

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	servicing of the mobile plant. The designated parking areas are shown in Appendix A. The sites tele-handlers have a radar system installed to help prevent collisions when reversing and also have a fire suppression system installed to them. The fixed plant is operated using the SCADA PLC system, this package is designed to collate all of the data available to the individual HMI's (Human Machine Interface). The HMI's allow the process to be started, stopped and for individual pieces of equipment to be operated out of sequence. It also logs and alerts any sparks using the Grecon spark detection equipment and any other alarms and faults as per the pre-defined set points. Reports are also created shift by shift to provide production volumes and run times.
Electrical Fault/Maintenance	It is recognised that electrical faults are a common cause of fires (normally providing ignition). Only trained and competent persons are authorised to work on electrical systems. Fixed testing is carried out every 5 years by a competent electrician and PAT testing is carried out every year by an experienced, qualified and competent electrician. Full details of required electrical testing and maintenance are detailed within the "H09-G01 Electricity' policy (see Appendix 15). This document ensures that electrical equipment is properly constructed, installed, maintained and that the installations are suitable for the environment in which they will be operating. All electrical equipment is inspected prior to use to ensure that it is in safe working condition and all cables and plugs are checked to ensure that they are in good working order and that there is no obvious damage and that all covers and guards are in place. Electrical panels and DB board's on-site all have a metal cover which are kept closed, electrical components / switches are only exposed when this is opened. These covers prevent any build-up of combustible waste, dust or fluff on electrical panels. Other electrical panels (MCCs) are installed with a fire suppression system. Planned preventive maintenance is managed and supported by Mayers.
Smoking Policy	A designated smoking area is in place. The area is a safe distance (well in excess of 6 metres) away from any combustible wastes; refer to site plan for exact location (see Appendix 1)
Hot Works	Safe working procedures are in place for all staff and contractors when undertaking hot work. A permit to work system is also in place for any hot works carried out outside of a controlled area e.g. workshop. No hot works will take place near flammable substances. All staff conducting hot works are trained to do so. This training is documented on our SHE TCM system. The permitted hot work activity will be supported by an adequate risk assessment with robust controls in place to ensure the risks associated with the activity are as low as reasonably practicable.
Industrial Heaters	Industrial heaters such as portable electric bar heaters, paraffin heaters etc. are banned from site.
Hot Exhausts	Risk assessments undertaken demonstrate that ignition exhausts from mobile plant poses a low risk. When mobile plant is not in use or when it cannot be used outside the plant between 18:00 and 06:00 it should be parked at least 6m from combustible material (see Appendix 1)
Leaks & Spillages	All spills will be cleaned up immediately using the spill kits available on site (see Appendix 4 page 3) If discovered, any leaking vehicles will be repaired or removed/sent off-site. Used spill kits are stored in oily waste bins and are collected by Veolia when required.

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Build-up of Loose Combustible Materials	Regular housekeeping is undertaken on site to prevent the build-up of loose potentially combustible material (such as dust accumulation from inside the grinder outlet conveyors). Operators from each shift have a responsibility to maintain good housekeeping including the clearing of material building up within conveyors and in the surrounding areas. General housekeeping is managed by shift supervisors this includes ensuring the regular use of the floor sweeper/mop. The use of brooms is prohibited for large piles of dust/material.
Self -combustion	Feed waste unlikely to self-combust due to Waste Acceptance Procedure, trusted sources, regular temperature monitoring, minimised storage time on site and “First In, First Out” principle Waste piles are subjected to hand-held FLIR checks once per shift and additionally prior to shift handover. The material is frequently moved and not left in situ for more than 14 days
Reactions between Wastes	All waste streams are separated on site in avoiding ‘reactions’ that may cause self-heating to occur and later possible combustion
Hot Loads	50°C is the employed threshold to define a “Hot Load” based on risk assessment and observed temperatures from site – as no incoming loads have recorded temperatures exceeding 30°C, the use of 50°C is a realistic indicator of potential thermal activity and a “Hot Load” IES expect all temperatures to be below 50°C. When temperatures exceed 50°C from incoming raw material, this waste would still be accepted onto site and managed accordingly with guidance from Site Management and Shift Management via IES’s Waste Acceptance Procedure. Acceptance is based on the ignition risk and the wider environmental impact of potential fire during transit i.e. IES do not reject loads that can put other receptors at risk. As well the reasoning below, once declared “safe” following sustained temperature readings below 50°C using the hand-held FLIR, this reduces ignition risk and makes hotspots within piles less likely. Despite the potential for hotspots in waste piles being low, all piles (including those in the Quarantine Area) are within range of fire suppression equipment. Despite having a “Hot Load” procedure, it is unlikely that it will be employed due to the following reasons: Feed waste is sourced from intra-group facilities which eliminates the risk of contamination and associated localised heating
Heat & Spark Protection	Any sources of ignition will be kept away from all flammable materials (e.g. fuels, oils, solvents) – This will be a minimum distance of 6 meters. For example, flammable materials will be kept away from the hot work activities. Safe Working Procedures (SWPs) are in place for staff and contractors when undertaking hot works. The relevant SWPs contain procedures to prevent fires starting (extinguishers/hoses on standby etc.). No hot works will take place near flammable substances. All staff who use hot work equipment are trained in its use and the training is recorded on the TCM system. A Fire Watch will be maintained for at least 60 minutes following the completion of any ‘Hot works’ (e.g. grinding/welding). See Appendix 19). Operators do a regular walk-around and will check specific areas prompted by their patrol sheets. Mobile shovel drivers are required to lift the bucket from the ground when moving and only lower and engage with the ground before scooping and lifting scrap or other waste materials,

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	to minimise the risk of any sparking. Mobile plant (hot exhausts) do not operate near flammable sources (tanks / containers of flammable substances clearly signed and separated by barriers); Tele-handlers also have installed, radar proximity devices to help prevent collision (and also prevent proximity) with objects/materials. Smoking is only permitted at the designated smoking area which is away from flammable and combustible storage areas.
Gas Bottles & Other Flammables	The site does not have production burning activities and fabrication and welding activities take place as required. Gas cylinders, mainly oxygen and propane are stored upright and secured in a lockable cage outside when not in use. Minimum quantities are kept on site. (See Appendix 1). The fuel tank is located outside away from any storage areas. (Also see Appendix 1). Spillages on site are cleared up using the spill kits provided. Spill kits are inspected monthly to ensure they are well stocked. Emergency drills are conducted on a quarterly basis.
Smoke/Heat/Flame Detectors	Fire detection systems fitted to granulation plant. Infeed hall (where combustible wastes are stored) also benefits from a heat detection camera. The camera will send a video alert to our security contractor who will then alert site management. This system operates 24/7. In the event of a major incident on site, the Emergency plan (Appendix 20) will be enacted. All site operations will cease and will not start again until the emergency services confirm it is safe to do so. As part of their general duties, operational staff are mindful of any sign of fire or potential or sources of ignition. Staff are trained to continually check for any signs of fire, and report any emergency immediately over issued site radios that connect with the main office. The site also benefits from a FLIR gun which responsible operatives are trained to use including the response needed to significant temperature readings. The camera will be calibrated and maintained as per manufacturer guidelines to ensure adequate performance, including accuracy of $\pm 2\%$ up to 50°C. Both CCTV and thermal imaging CCTV are remotely monitored, maintained and serviced by MITIE, including non-operational hours e.g. Christmas day. Aside from allowing visual detection, these cameras are fitted with 250°C alarm which alerts both MITIE and on-site security staff if this temperature is met or exceeded. A Fire Watch will be maintained for at least 60 minutes following the completion of any 'Hot works' (e.g. grinding/welding). This is covered in our hot works permit.

## 2.5 Detection Systems

The site benefits from a range of both CCTV (security) and thermal imaging cameras. The PCCW plant is fitted with a Grecon spark detection system which is linked to the overall plants PLC. The granulation line will also be fitted with a Grecon spark detection system that will be connected to the PLC.

### 2.5.1 Systems in Use

Specification of CCTV cameras in use (and locations) can be obtained from IES separately where required. Refer back to the table above in section 2.4.1. Strict acceptance procedures and requirements will substantially limit self-combustion risk within piles (see appendices 7, 8, 9, 10, 11 and 12 for further information). Thermal imaging devices are designed to initiate an immediate emergency response when flame or surface heat changes are detected.

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### 2.5.2 Third Party Certification (UKAS Accreditation)

The systems employed are not automated and do not require associated 'third party accreditation (UKAS).

### 2.6 Demonstrating Quality of Stock

Also with reference to section 2.2.2 (waste acceptance Procedures) all waste accepted on-site will have been pre-processed at other EMR sites and protected against contamination prior to being delivered to IES Oldbury. Waste is regularly sampled for analysis of waste piles, material is monitored using CCTV, thermal imaging cameras and by those working and patrolling the areas.

## Section 3 – Preventing Spread/Limiting Impact of Fire

This section demonstrates procedures that can limit the impact/spread of any fire (should it happen), and with the aim that any fire will be extinguished within 4 hours.

### 3.1 Separation distances

There will be a minimum of 6m separation between different types of combustible materials (waste piles) and between combustible and flammable materials limiting any potential fire spread and affording access to emergency services and plant movements (moving materials etc.) where required. The 6m separation distance will also be employed on the site boundary (where required) to eliminate risk to surrounding business/property in any emergency situation. Also refer to section 2.4 – Managing Common Causes of Fire

### 3.2 Use of Fire Walls

There are no fire walls within the IES facility.

### 3.3 Storage of Waste in Bays

Each waste type is stored within a designated bay and is not mixed (Appendix 1)

The bays used for storing the PCCW material are constructed using Legato blocks (Appendix 3) and are class A1 fire resistant meaning that they are totally non-combustible and therefore will long exceed 120 minutes of fire.

The bays used for storing material outside are constructed from pre-stressed concrete panels capable of providing 180 minutes fire resistance. (See Appendix 22).

Wastes from the processes are drawn either from LEV/ air separation and conveyor screws to bag filters and 'waste container' stations. Bag filters from the grinding line have connectors to attach lay flat hoses in the event of fire internal to bag house. Waste container stations are hook- lift skips that are docked under a conveyor screw and lid, therefore sealed during operation. These stations are external to building and in the extremely unlikely event of a fire, the site will be quickly alerted and able to tackle a fire with hose reels, lay-flats or fire engine. The waste container stations are constructed of steel in the common design of 30m<sup>3</sup> skips, a fire inside of the bin will be controlled and segregated easily without risk of spread.

### 3.4 Use of Suppression Systems

Suppression systems can be used in any 'active firefighting' (refer to section 3.5) proposed and to assist attending emergency services.

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### 3.4.1 Building Suppression

Portable fire extinguishers and hose reels are in place around the facility as identified in H&S risk assessments, refer to site plan in Appendix 4 pages 3, 4 & 6 for exact location. Given the controls outlined in this document and the fact that the site is always manned the risk of fire on site is low. We therefore believe that the fire engine, oscillating water cannon, hydrants, fire extinguishers, fire hoses and canal water mentioned above is sufficient enough to extinguish a fire on site.

### 3.4.2 Other Suppression Systems in Use

The site benefits from a fire engine which can be provided by the adjacent EMR facility for immediate deployment if/where required. It is parked outside of EMR's Hall 1 and has a 12,000 litre water tank and 1400L foam additive capability. This equipment is restricted to trained and authorised EMR employees only. Should we require more water; the fire engine can also be connected to the hydrants on site using a stand pipe and hoses. The FRS (fire & rescue service) would also have access to the canal running along our boundary. Hydrants are available across the site. Exact locations can be found on the maps in Appendix 4 pages 1 & 3. The minimum pressure supplied by the water company is 1 bar. The hydrants can supply up to 20m<sup>3</sup> /minute (as agreed with the water company) when the site was constructed. The site has fitted pressure gauges to monitor pressure levels and ensure sufficient pressure is maintained for the capability of responding to an incident. The hydrants will be assessed externally on an annual basis.

### 3.4.3 Third Party Certification (UKAS Accreditation)

Only required for automated systems – if not in use, simply state this other than ignore this requirement.

## 3.5 Active Firefighting

IES will facilitate and encourage active firefighting where safe to do so and where practicable. IES has sufficient and suitable procedures in place (Environmental Protection Procedures and Safe Working Procedures) to facilitate firefighting. The site has available to it, fire extinguishers, Fire water hoses and support of a fully operational fire engine provided by EMR. See Appendix 21 for fire engine SOP. IES staff are trained in firefighting to various degrees and are experienced in moving and isolating fires, including members of staff in the specific running out and use of high pressure hoses connected to the sites fire engine or fire water tanks. In addition, there are staff members trained to use the grab material handler and additional staff members trained to use the mobile shovel which can be used for firefighting purposes if required. All IES staff are to follow a firefighting procedures (see Appendices 16, 17 & 18). Three members of staff are designated key holders in any out of hour's situation e.g. Christmas shutdown. Regular drills are held to help ensure staff, customers, visitors or contractors on site, understand what they need to do in the event of a fire. The drill helps test how effective our evacuation plan is, identifies any weaknesses we may have in emergency response and helps us make improvements where weakness are identified. Further information is communicated to visitor's and contractors during their induction e.g. sounds of alarm, how to react, where to muster etc. Regular checks of the water tank are made in ensuring that water is immediately available should an emergency situation arise.

### 3.5.1 Availability of Quarantine Area

The site has the capacity to ensure that space will be made available in any emergency situation to accommodate 50% of the largest pile on site (area measures 20m x 20m x12m). The quarantine area is

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detailed within Appendix 1. The area used is within the site permitted boundary, and benefits from a sealed drainage system – allowing for flexibility in providing sufficient ‘active firefighting’ capability.

### 3.6 Water Supplies

Water can be supplied on site via 12 hydrants located across the EMR & IES Site, a 90,000 litre hydrant fed water tank which is situated at the NE side of site and an 88,000 litre granulation fire water tank situated at the NW side of site. EMR’s fire engine is available to support, with a 12,000 litre water tank and deploying the 1,400 litre foam capability, using other water (not EMR’s) supplied by the fire and rescue service and lastly canal water which can also be used to help suppress a fire at the IES facility.

#### 3.6.1 Availability

##### Hydrants

As stated above (3.4.2) the Site Emergency Plan maps (Appendix 4 page 1) identifies the 12 hydrants located across the EMR & IES site. The hydrants are inspected to confirm clear access during regular site inspections.

##### Fire engine

The EMR owned functioning fire engine has a holding capacity of an additional 12’000 litres and 1,400 litre foam additive capability which is kept full and ready at all times. Should we require more water; the fire engine can also be connected to the hydrants on site using a stand pipe and hoses. See Appendix 21 for fire engine SOP.

##### Additional Water (Not EMR Oldbury)

Section 16 of the FPP Guidance stipulates that sites “must have enough water available for firefighting” but does not stipulate that the water supply has to be stored on site. The Fire & Rescue Service may provide their own water supply on the fire engine. The responding brigade would be the West Midlands Fire Service (Oldbury Fire Station, Old Park Lane, Oldbury, B69 4PU) who are located 2 miles from IES Oldbury. Depending on the scale of the fire, water from the adjacent canal may be used for fire suppression and extinguishing. It should be noted that IES Oldbury will not be using canal water to suppress and extinguish fires, however, it is the decision of the attending Fire & Rescue Service whether to utilise the canal for this purpose as permitted by Section 32(2) of the Water Resources Act 1991. As such, the Fire & Rescue Service have confirmed their ability to utilise the canal for water to suppress and extinguish fires at IES Oldbury. (Local station contact mark.atkinson@wmfs.net) The Fire & Rescue Service have confirmed their ability to recirculate the firewater. The combination of recirculation and the targeted application of water/firewater using mobile plant, reduces the quantity of water requiring abstraction from the adjacent canal. A safe access point for the Fire & Rescue Service to abstract water from the canal has been clearly marked on a perimeter fence panel. Given the controls outlined in this document and the fact that the site is always manned, the risk of fire on site is low.

The above demonstrates that the fire engine, hydrants and canal water mentioned above would be sufficient enough water to extinguish a fire on site.

Furthermore ref section 16 of the FPP guidance “If you are relying on a water supply from open sources such as ponds, canals and rivers, you must take the seasons into account to make sure an adequate supply is available”. Actions are assigned on site and are to be completed each month. These include

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checking the water level heights in each of the lagoons and checks to the interceptors and penstock valves.

### 3.6.2 Water Calculations

The following represents water calculations based on EA FPP guidance in a worst case scenario, and representative of the largest pile on site. As it is not physically possible to provide this amount of water in any emergency situation, the final column represents actually delivery available on site. For material that presents low combustibility value, it is unlikely that the amount of water stipulated within FPP Guidance would be required. Section 16 of the FPP Guidance states a requirement of 2,000 litres per minute for a minimum of 3 hours to tackle a 300m<sup>3</sup> pile. Below are the steps calculated to determine the quantity of water IES Oldbury require to extinguish a 1,250m<sup>3</sup> waste pile fire (taking into account 27% moisture which the material will hold):

- 2000 (litres) x 60 (minutes) x 3 (hours) = 360000 litres required in 3 hours
- 360000 litres = 360m<sup>3</sup>
- Determine the factor to scale equation to cater for 1250 m<sup>3</sup> pile.
- 1250 / 300 = 4.167
- 360m<sup>3</sup> x 4.167 = 1,500m<sup>3</sup> i.e. 1,500m<sup>3</sup> (1,500,000 litres) water required for a 1,250 m<sup>3</sup> pile of waste  
Over three hours, this relates to 1,500,000 litres / 3 = 500,000 litres per hour.

There is a 90,000 litres hydrant-fed water tank to supply an oscillating cannon situated opposite the infeed bay (bay 3). See Appendix A. The cannon is able to discharge at a rate of 1,000 litres/minute. Similarly, the dousing effect from the close cannon allows for quick and effective fire suppression. Additionally, in the event of a fire, Area 3 is easily accessible for the site fire engine, therefore providing rapid access to a combined 102,000 litres of water for just under two hours. The location of the tank can be found on the map in Appendix A.

The Granulation fire water tank has an 88,000 Litre capacity, with a pump capable of pumping 272 litres per minute, 163m<sup>3</sup> per hour.

The aforementioned rates provide IES with a minimum of 60 minutes (largest pile) of firefighting time that can be extended via local recharge (to allow Fire & Rescue Services to attend) or recharge instructed by the Fire & Rescue Services themselves (as required by Section 14 of FPP Guidance).

Given the nature and scale of waste management activities completed on site and associated risk, the hydrant-fed tank and cannon, generating a dousing effect, at an area where the majority of the sites waste management operations are carried can be considered a proportionate fire suppression system.

### 3.6.3 Managing Firewater (Containment)

IES has impermeable concrete paving and a sealed drainage system which prevents the escape of any site-derived water (including firewater) from the permitted site boundary. The design of the surface falls within the sealed drainage system directs all site-derived water into Lagoon 3 which has a capacity of 1,250m<sup>3</sup> and this is supported by Lagoon 2 which has a capacity of 750m<sup>3</sup>. With a combined capacity of 2,000m<sup>3</sup>, this sufficiently holds the 1,500m<sup>3</sup> required to extinguish IES's largest waste pile in worst case scenario. Furthermore, given that 1,500m<sup>3</sup> is likely to be an overestimate, for the reasons outlined previously, this gives further confidence that the capacity of Lagoon 3 and Lagoon 2 are sufficient enough to contain all generated firewater.

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The drainage plan in Appendix 5 outlines pond location and capacity.

The site boundary is a curbed perimeter, designed so that water will be directed to lagoons and water contained within the boundary. This calculates to 12,000m<sup>3</sup> of additional containment for fire water. This calculation is far below actual containment if considering the numerous gradients that have been designed at civils level for directing water.

### 3.7 Notifying Stakeholders

IES will enact its 'crisis communication plan' – this includes a central liaison facility to make contact with all internal and external stakeholders and the local press. The emergency services communication structure will also be used in line with advice from disseminating relevant information from Public Health England (if required).

### 3.8 Contingency Planning

Feed waste delivery will be discontinued immediately. All stored feed waste will be dispatched to a suitably licenced disposal facility within 2 weeks.

In the event the site reaches capacity or needs to close for whatever reason (an emergency), the EMR sites where the material is delivered from will be instructed to hold the material if their permit allows it or send the material to another one of EMR's separation facilities if their permit allows it otherwise material will have to be sent to land fill.

Waste stored on site will continue to be subjected to temperature monitoring procedures, including hand-held FLIR checks, Fire watches and CCTV.

#### 3.8.1 Clearance & Decontamination

##### Disposal of fire water

Under normal operations, water from Lagoon 3 and lagoon 2 are treated through a bypass interceptor prior to discharge into the River Tame. The interceptor is emptied by an authorised contractor when required. Both ponds have penstock valves which are closed during firefighting operations to contain the firewater and prevent discharge into the River Tame. The manual closing of the penstock valves is the responsibility of the Incident Controller. Furthermore, the closing of the penstock valves also allows the Fire & Rescue Services to recirculate the firewater from Lagoon 3 and lagoon 2.

Once firefighting operations are completed, the firewater in Ponds 1 and 2 is subjected to waste classification analysis so can be dispatched from site as soon as practicable to a permitted facility authorised to accept the waste. The firewater will not be dispatched from site until the waste classification analysis is completed as per Duty of Care requirements. For clarity, there is no agreement with Severn Trent to discharge firewater from Ponds 1 and 2 into the River Tame via the interceptor.

##### Disposal of burnt materials

Any burnt wastes or material residues of the fire will be subjected to waste classification analysis so can be dispatched from site as soon as practicable to a permitted facility authorised to accept the waste. This would occur in agreement with the Environment Agency.

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### 3.8.2 Becoming Operational

#### Reporting/Lessons Learnt

Following any environmental incident including fires, details of the event are recorded and reported on an Event log on EMR's electronic TCM management system. This Event log or electronic reporting system enables all the details of the fire to be recorded including sequence of events, size and extent of fire, damage sustained (internally and externally), recording of the investigation and actions taken (recorded on Action log). Data from the TCM system (including data from recorded hazards interventions) can be accessed to obtain trends and identify common factors and obtain other useful information. Resuming Activities Normal activities would not resume until the site has been fully decontaminated and assessed as fit for purpose, both operationally and in achieving full FPP compliance.

#### Resuming Activities

Normal activities would not resume until the site has been fully decontaminated and assessed as fit for purpose, both operationally and in achieving full FPP compliance.

## Appendices

- Appendix 1 – IES Site Map
- Appendix 2 – Sensitive Receptors Information
- Appendix 3 - Legato Fire Wall Concrete Specification
- Appendix 4 - Emergency Maps – V16
- Appendix 5 - IES Site Drainage Plan
- Appendix 6 - Stock Control
- Appendix 7 - Extended shut down preparations
- Appendix 8 - EPP-1.1 The Duty of Care Acceptance of Incoming Material v2-v3
- Appendix 9 - EPP-1.2 Inspection of Incoming Material-v2
- Appendix 10 - EPP-1.4 Completing Hazardous Waste Consignment Notes - Issue 1-v1
- Appendix 11 - EPP-1.6 - Identification of Radioactive Items-Iss.5-v5
- Appendix 12 - EPP-1.7 Identification of Explosive Materials-v2
- Appendix 13 - EPP-1.8 Rejection of Waste Material - Issue 2-v3 (2)
- Appendix 14 - EPP 2.14 Storage of POPs Containing Cable - issue 1-v1
- Appendix 15 - H09-G01 Electricity Guidance - Issue 1-v1
- Appendix 16 - SWP-7.3 - Emergency - Fire Fighting Issue 1-v4
- Appendix 17 - SWP-7.13 - Emergency - Use of Fire Extinguishers - Issue 1-v3 (1)
- Appendix 18 - SWP-7.15 - Emergency- Use of the Fire Engine- Issue 1-v1 (2)
- Appendix 19 - H44-05 Hot Work PTW 01.10.21
- Appendix 20 - E04-02 Emergency Plan
- Appendix 21 - Fire Engine SOP
- Appendix 22 – Concrete panel bays

Note – Appendix 1 included with permit variation application. All other appendices 2 – 22 (due to size) not included but are available on request.

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ASSOCIATED DRAWINGS	
No.	TITLE
XXXX	XXXX
NOTES	

REV	DATE	BY	DETAILS	CHK'D
△	03.07.22	T.S	GRANULATION WATER TANK DETAILS	T.S
△	15.05.22	T.S	NEW ENTRANCE ADDED TO LAYOUT	T.S
△	15.02.22	T.S	IES EXISTING STACK REMOVED	T.S
△	16.12.21	T.S	PRE SHREDDER LOCATION CHANGED	T.S
△	03.12.21	T.S	LEV ADDED TO GRINDERS & SEP PLANT	T.S
△	10.11.21	T.S	EQUIPMENT ADDED TO THE LAYOUT	T.S
△	05.11.21	T.S	IES GRANULATION EMISSION POINTS ADDED	T.S
△	02.10.14	S.B	Water Drainage Points Added	R.W
△	29.09.14	S.B	IES Emission Points Added	R.W
△	18.09.14	S.B	EMR & IES Boundary Modified	R.W
△	05.09.14	S.B	EMR & IES Boundary Added	R.W
△	20.08.14	S.B	IA	R.W
REV	DATE	BY	DETAILS	CHK'D

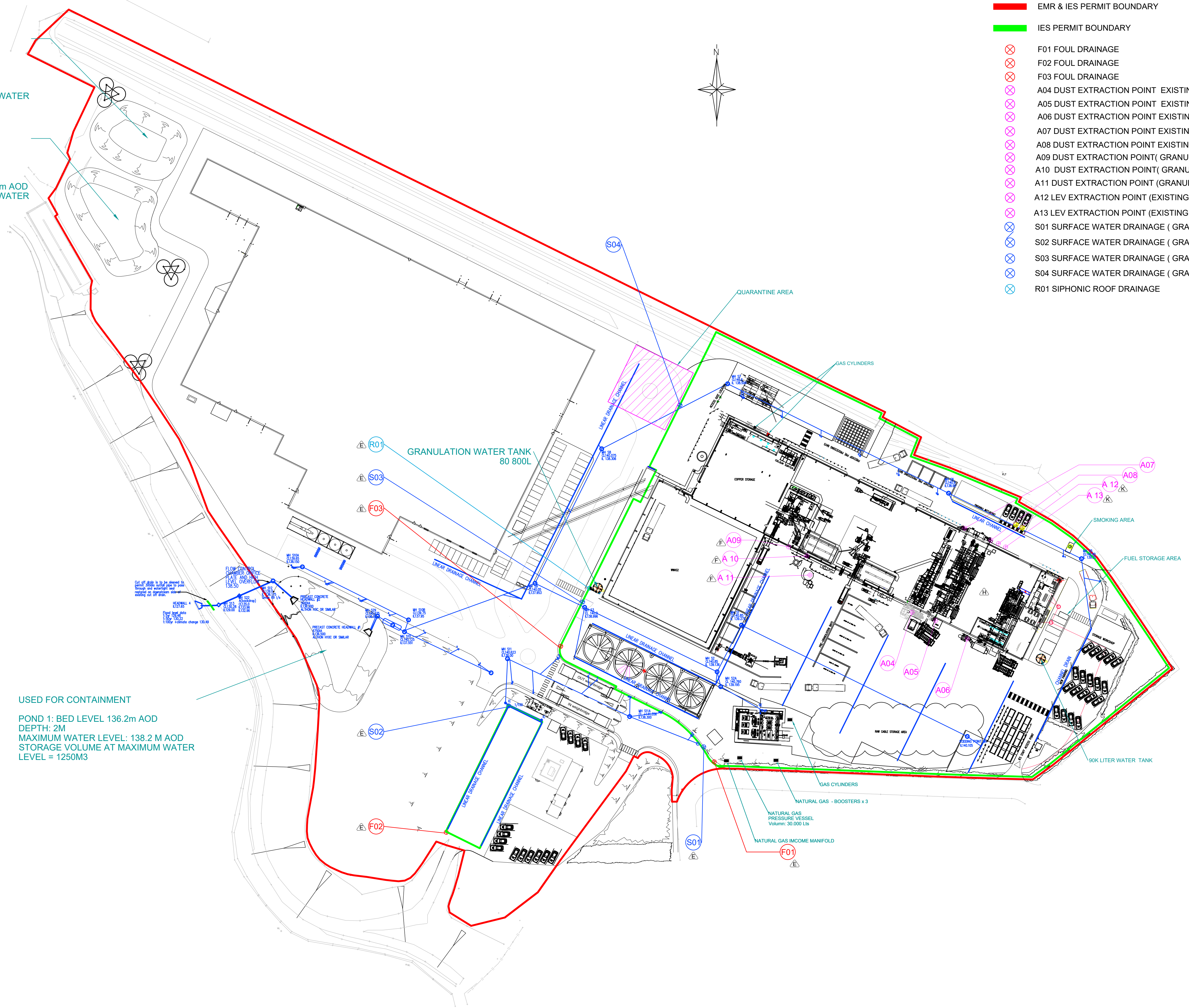
**LEGEND:**

- EMR & IES PERMIT BOUNDARY
- IES PERMIT BOUNDARY
- ⊗ F01 FOUL DRAINAGE
- ⊗ F02 FOUL DRAINAGE
- ⊗ F03 FOUL DRAINAGE
- ⊗ A04 DUST EXTRACTION POINT EXISTING
- ⊗ A05 DUST EXTRACTION POINT EXISTING
- ⊗ A06 DUST EXTRACTION POINT EXISTING
- ⊗ A07 DUST EXTRACTION POINT EXISTING
- ⊗ A08 DUST EXTRACTION POINT EXISTING
- ⊗ A09 DUST EXTRACTION POINT ( GRANULATION LINE)
- ⊗ A10 DUST EXTRACTION POINT ( GRANULATION LINE)
- ⊗ A11 DUST EXTRACTION POINT ( GRANULATION LINE)
- ⊗ A12 LEV EXTRACTION POINT (EXISTING GRINDING LINE)
- ⊗ A13 LEV EXTRACTION POINT (EXISTING SEPARATION LINE)
- ⊗ S01 SURFACE WATER DRAINAGE ( GRAVITY )
- ⊗ S02 SURFACE WATER DRAINAGE ( GRAVITY )
- ⊗ S03 SURFACE WATER DRAINAGE ( GRAVITY )
- ⊗ S04 SURFACE WATER DRAINAGE ( GRAVITY )
- ⊗ R01 SIPHONIC ROOF DRAINAGE

**USED FOR WATER SUPPLY**  
**POND 3**  
 BED LEVEL 136.33m AOD  
 DEPTH: 2m  
 MAXIMUM WATER LEVEL: 138.33  
 STORAGE VOLUME AT MAXIMUM WATER LEVEL = 650m<sup>3</sup>

**USED FOR CONTAINMENT**  
**POND 2**  
 BED LEVEL 136.2m AOD  
 DEPTH: 1.5 M  
 MAXIMUM WATER LEVEL: 137.770 m AOD  
 STORAGE VOLUME AT MAXIMUM WATER LEVEL = 750m<sup>3</sup>

**USED FOR CONTAINMENT**  
**POND 1: BED LEVEL 136.2m AOD**  
 DEPTH: 2M  
 MAXIMUM WATER LEVEL: 138.2 M AOD  
 STORAGE VOLUME AT MAXIMUM WATER LEVEL = 1250M<sup>3</sup>



PROJECT	
IES GRANULATION LINE	
TITLE	
PERMIT BOUNDARIES AND EMISSION POINTS .	
<small>EUROPEAN METAL RECYCLING LIMITED          50/51 HOUSE, 12/14 CRESCENT          WESTBORO, WASHINGTON WA5 7NS          TEL: 01925-715 400          FAX: 01925-715 470</small>	
DRAWING STATUS:	PRELIMINARY
DRAWING SIZE:	A1
SCALE:	1:750
DATE:	15.05.2022
DRAWING No:	031_A96
DRAWING No:	031_A96
SHEET:	1 OF 1