

Fire Prevention Plan

**Aug 2026
V4.1**

Issued By: Amy Gadsby	Authorised by: Bradley Mills	Page 1 of 30	Issue Date: 24th Aug 2026 (update only to layout plans)
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1.0 Introduction

1.1 Background

- Fire Prevention Plan for Techemet Ltd's site at 1 Vanguard, Wilnecote, Tamworth, B77 5DY (OS Grid Reference 421984 300617)



Fig 1.1.1 Site Location

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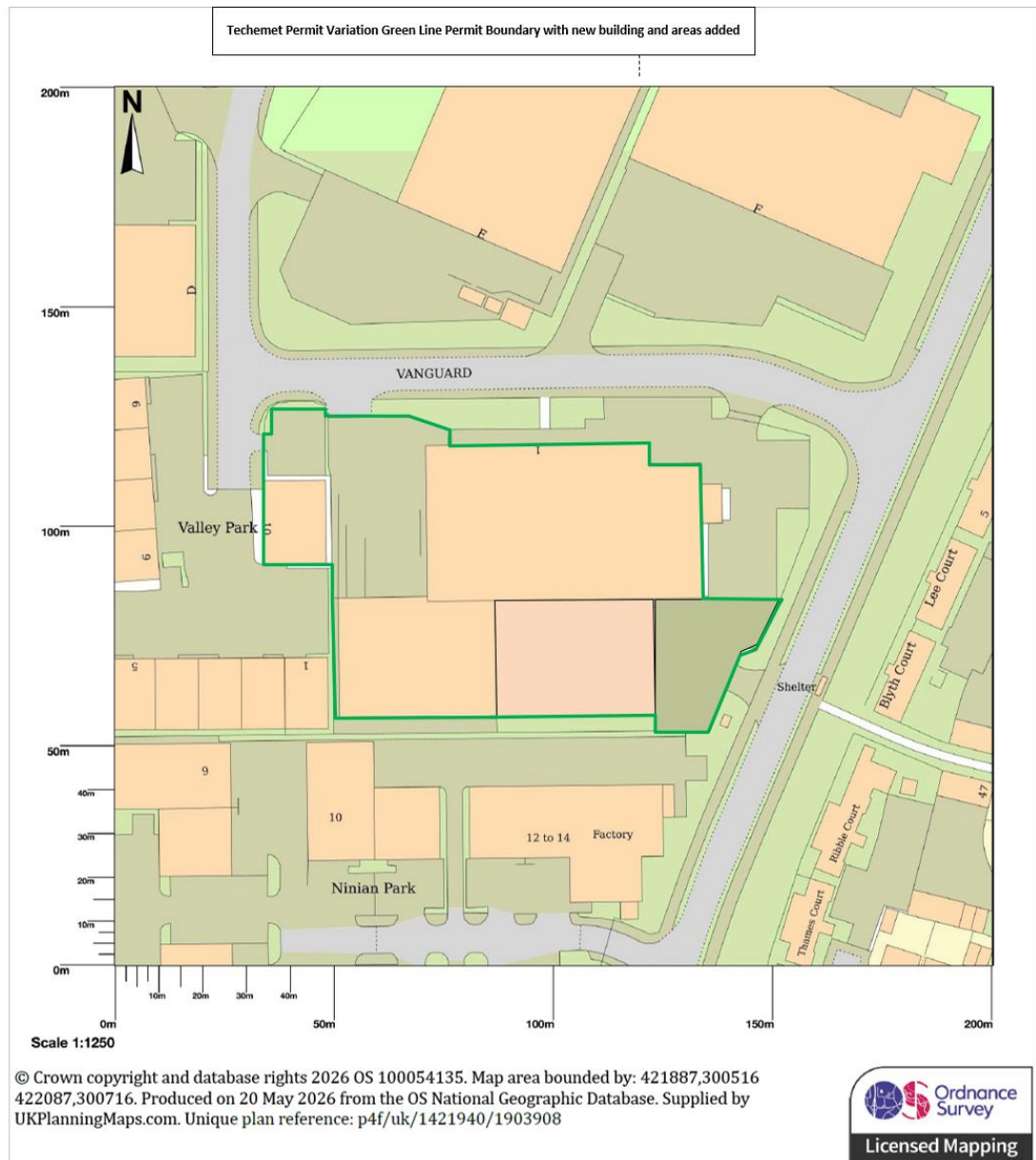


Fig 1.1.2 Site location detailed

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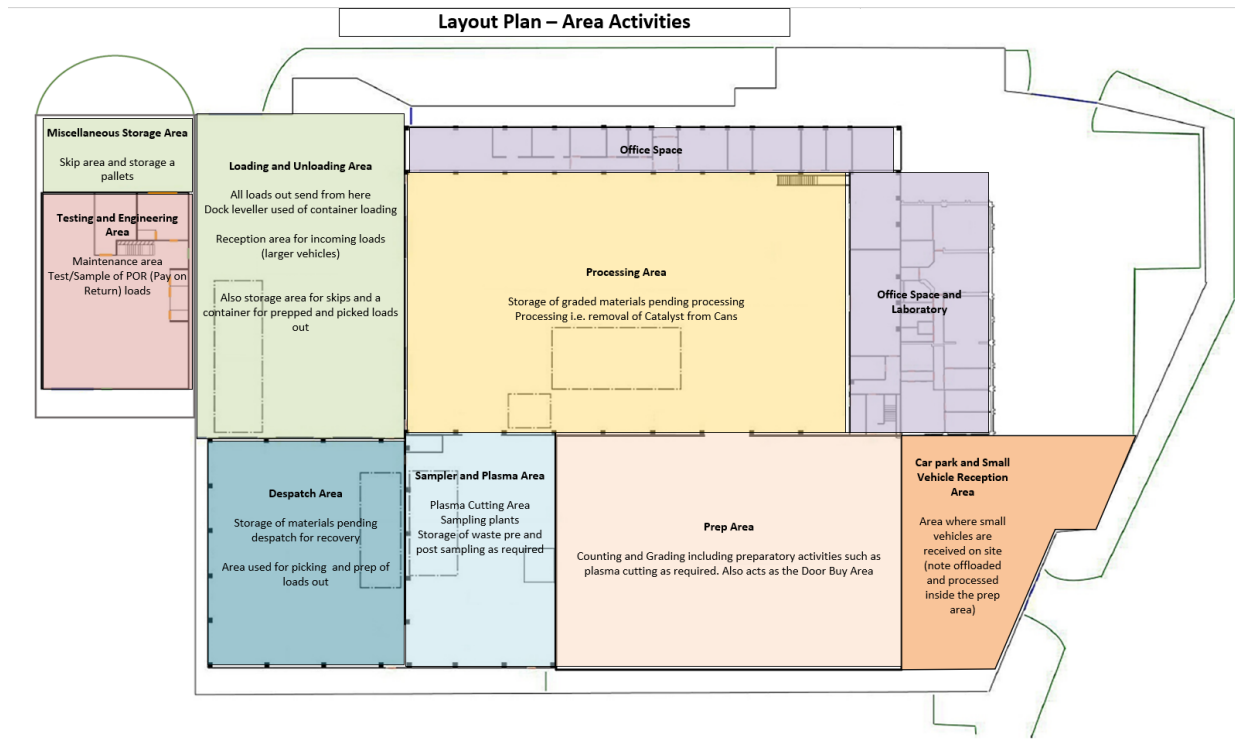


Fig 1.1.3 Site Layout

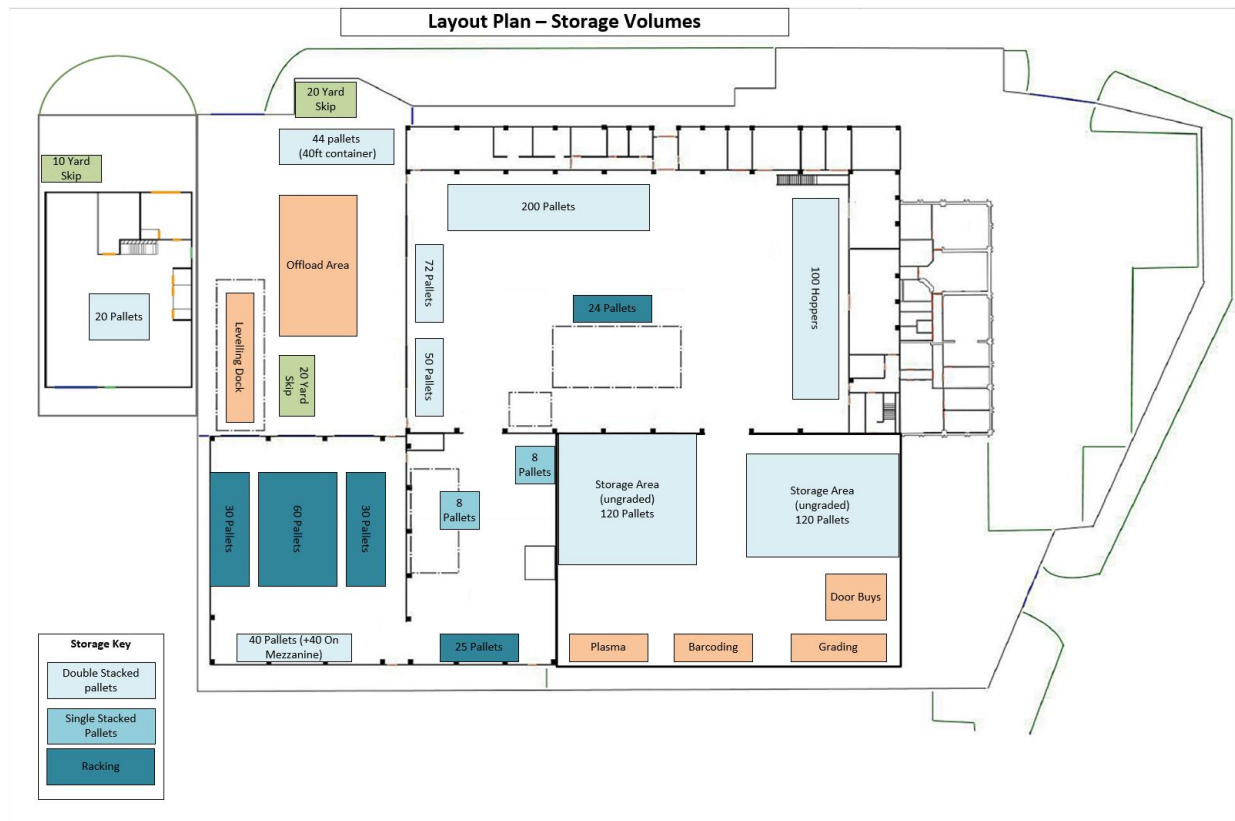


Fig 1.1.4 Site Storage Layout

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The site's detailed layout is shown in "*GEN373 – Overall Site Plan Template*"

1.2 Objectives

The objectives of this fire prevention plan is too:

- Minimise the likelihood of a fire happening;
- Aim for a fire to be extinguished as soon as reasonably practicable
- Minimise the spread of fire within the site and to neighbouring sites.

1.3 Information sources and references

- This Fire Prevention Plan document (*FPP*) has been produced in accordance with Environment Agency guidance dated 11th January 2021 describing fire prevention plan (FPP) requirements for waste management sites with an environmental permit.
<https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>

1.4 Using this Fire Prevention Plan

- This plan will be kept in the Environmental Folder on Techemet's secure S://Drive.
- This plan will be reviewed annually and logged on "*GEN383 – Techemet Year Planner*" to ensure that employees understand their role in maintaining compliance with this FPP particularly with regard to materials storage and fire prevention precautions.

2.0 Activities undertaken at the site

2.1 Waste management activities and combustible wastes.

- The site is primarily operated as a catalytic convertor dismantling facility. The site has a bespoke environmental permit (*Ref. EPR/CB3006CW*) for de-canning catalytic convertors.
 - This permit is being varied to an in installation permit with the following activities:
 - Metal recycling site 5-25k (– As Current)
 - S5.6 Storage temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b)
 - S5.3a) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
(ii) physico-chemical treatment;
 - S5.3(a) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
(iii) blending or mixing prior to submission to any of the other activities listed in this Section or in Section 5.1;

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- S5.3(a) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
 (iv) repackaging prior to submission to any of the other activities listed in this Section or in Section 5.1;
- In addition, the site operates as hazardous waste transfer site for small batches of end of life vehicle (*ELV*) batteries and waste electrical and electronic equipment (*WEEE*) containing precious metals.
- The site employs between 40-50 employees directly and typically between 1 - 5 agency employees.

The site will be operational during the following hours for Deliveries (but may run up to 24 hours a day processing):

- Monday to Friday 06:00am to 18.00pm
- Saturday 06.00am to 18.00pm
- Sundays and Bank Holidays 06.00am to 18.00pm

It is noted, under the 'Decision Notice' from Tamworth Borough Council, reference 0438/2005. The building shall be insulated so that the noise level does not exceed the following levels:

- 45dB(A) leq between 08:00am – 18:00pm
- 40dB(A) leq between 06:00am – 22:00pm
- 35dB(A) leq between 22:00pm – 06:00am
- External noise levels of the daytime 10 hour leq measured between 08:00am and 18:00pm shall not exceed 55db (A) subject to a maximum of 60 db (A) leq 1 hour.

In the case of emergencies hours of operation may be extended subject to the consent of the Environment Agency. All emergencies shall be reported to the Environment Agency.

- All wastes accepted onto site are stored and treated inside the purpose designed factory. The factory has an impermeable concrete floor throughout and the designated work areas are served by extensive Local Exhaust Ventilation (*LEV*) systems that capture dusts and powders released into the air within the factory. The LEV consists of a primary filter system and a secondary HEPA filter with clean air returned to the facility. Captured dusts are recovered and recycled including the HEPA filters. The LEV systems are inspected annually by an approved contractor.
- The floors inside the factory's waste treatment and sampling areas are continuously swept using ride on electrically powered industrial floor cleaners. In addition, a number of industrial vacuum cleaners with HEPA filters are deployed in the work areas to enable local spillages of powders to be quickly cleaned up. The collected sweepings are recovered and recycled.

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Catalytic Convertor treatment process

- Catalytic Convertors received on site are delivered in one of the following types of containers:
 - One tonne bags on wooden pallets;
 - Re-purpose intermediate bulk containers (*IBC*);
 - Re-useable metal stillage's
 - Wooden pallet stacks.
- The incoming wastes are stored in their delivery packaging on the floor inside the waste treatment building in designated areas.
- During the grading process each container of catalytic convertors is emptied onto a grading table and each catalytic convertor is individually inspected and graded. The delivery packing is either discarded or if re-usable is stored in the haulage yard for reuse or return to the customer.
- During the grading process external components are removed from catalytic convertor shells e.g. wires, oxygen sensors, exhaust pipe. The external components are stored separately in repurposed IBCs pending recycling off site.
- Catalytic convertors graded as suitable for treatment are transferred into metal tipping bins between a weight capacity of 2000-2500kg.
- The catalytic convertors are de-canned in batches defined by customer's incoming lots. The catalytic convertor casings are disassembled into different components for recycling. These include: steel casings, wiring looms, copper cable, oxygen sensors, nickel alloy metal mesh, refractory ceramic fibres (*RCF*) and catalyst powders. The catalyst recovered from each customer's is segregated so that it can be analysed and its value determined separately.
- The RCF is stored on the shop floor in a designated area which is detailed in "*GEN197- Map for Emergency Services on Site*" in sealed polypropylene one tonne bags on wooden pallets until there are enough bags to fill a road haulage container at which time it is then sent offsite for recycling.
- The recovered catalyst is stored on designated racking and dispatch area in a sealed polypropylene one tonne capacity bags on wooden pallets. When there is sufficient to fill a road haulage container it is sent offsite for recycling. The recovered catalyst and RCF is delivered to Techemet LLP, United States. The shipments are managed in accordance with transfrontier shipment regulations.
- The catalytic convertor components are not combustible. The one tonne bags and wooden pallets used to package recovered catalyst and RCF is combustible. Once deployed the packaging is thinly spread around the bulk materials equivalent to <2% of the packages volume. If a pallet of bagged catalyst did catch on fire it is only the packaging that would

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burn. If this was allowed to burn it is likely that the catalyst powders released would gradually smother the fire around the pallet concerned.

- New packaging is stored on pallets in three locations where catalyst powders and RCF is produced. The packaging material is limited to one pallet of each type of material at each location. The additional packaging material is stored in racking in the dispatch area away from the main treatment areas.
- The catalytic convertors' steel casings are stored externally in two large roll on roll off containers. Usually one is awaiting collection while one is being filled. Other metal components recovered from catalytic convertors e.g. wiring looms, copper cable, oxygen sensors and nickel alloy metal mesh are sold as separate waste streams to suitably permitted waste recycling companies.
- The catalytic convertors' steel casings and other metal components are collected daily by European Metal Recycling Ltd, Kingsbury, Trinity Rd, Tamworth B78 2LB.

Miscellaneous High Value and Precious Metal containing Wastes

- Techemet in addition to the primary activity of automotive catalyst also accept a range of other waste. In the current permit variation 6 there are a range of additional codes to be added to the permit. These wastes will accepted on site for the purposes of sampling (as required) and transfer for onward recovery. Some of the waste may require repackaging or blending.
- These waste are all analogous to materials currently handled on site as below:
 - They are inorganic solids
 - They contain high value or precious metal fractions – for example smelter grade metal rich incinerator bottom ash (a high metal bearing fraction of IBA which has been isolated/produced for recovery of the metal content)
 - They are non-combustible and do not pose any additional risks
 - Not 05 codes from Petro chemical refining will be subject to detailed pre-acceptance and checks to ensure that any risks of combustion or flammability are correctly managed – not more than 1 m3 would be accepted at anyone time
 - They are small volume but high value wastes and are stored in sealed containers (small drums) and would typically be only a few kilograms in weight up to a maximum site of 1 tonne in an IBC

Table 2 EWC codes

EWC	Hazardous	EWC Description
01 03 05*	Yes	other tailings containing hazardous substances
05 01 99	No	Wastes not otherwise specified
05 01 03*	Yes	tank bottom sludges
05 01 09*	Yes	Sludges from on-site effluent treatment containing hazardous substances

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10 07 01	No	slags from primary and secondary production
10 07 02	No	dross and skimmings from primary and secondary production
10 07 03	No	solid wastes from gas treatment
10 07 04	No	other particulates and dust
10 07 05	No	sludges and filter cakes from gas treatment
10 07 99	No	wastes not otherwise specified
11 01 09*	Yes	sludges and filter cakes containing hazardous substances
16 05 06*	Yes	laboratory chemicals, consisting of or containing hazardous substances, including mixtures of laboratory chemicals
16 05 07*	Yes	discarded inorganic chemicals consisting of or containing hazardous substances
16 05 09	No	discarded chemicals other than those mentioned in 16 05 06, 16 05 07 or 16 05 08
16 08 04	No	spent fluid catalytic cracking catalysts (except 16 08 07)
16 08 05*	Yes	spent catalysts containing phosphoric acid
16 08 06*	Yes	spent liquids used as catalysts
16 11 05*	Yes	linings and refractories from non-metallurgical processes containing hazardous substances
17 04 07	No	mixed metals
17 04 09*	Yes	metal waste contaminated with hazardous substances
19 01 11*	Yes	bottom ash and slag containing hazardous substances
19 10 02	No	non-ferrous waste

Waste Batteries

- The site receives small numbers of ELV lead acid batteries (*see Table 1*). These are stored in lidded plastic dolavs indoors in the waste dispatch area used for small deliveries (*door buy area*). Once a dolav of lead acid batteries is full then it is sent for recycling to a suitably permitted waste treatment site.
- There are typically two dolavs of lead acid batteries on site. One awaiting collection and one being filled. The dolavs are stored in the waste dispatch area so that they can be easily added to as further batteries are delivered to the door buy area. The storage and subsequent collection from the dispatch area helps to minimise the need to move the dolavs and minimises the need to handle the waste batteries.
- The ELV batteries are collected by European Metal Recycling Ltd, Kingsbury, Trinity Rd, Tamworth B78 2LB

Laboratory chemicals, waste oils and aerosol cans

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- The site includes a chemical analysis laboratory staffed by a small team of technicians. The laboratory is used to test the purity of the catalyst material recovered from the incoming wastes.
- The Laboratory generates an aqueous solution of waste laboratory reagent chemicals. This is stored in a bunded sealed 205 litre drums, collections are then arranged for Hazardous material by an approved contractor once the bunded area has reached ½ of its capacity. 1 x sealed 205 litre drum is made available and in use full time, this drum is located in the Laboratory.
- In the same bunded hazardous waste storage area two other metal 205 litre sealed drums are used to collect hazardous waste. The following waste is stored on the bunded area:
 - Dilute ex acid waste
 - Oily rags and used spill granules
 - Broken glass
 - Waste oil
- The bunded waste storage area is separated from the surrounding processing area by clear floor space demarcated by floor markings.
- The drummed hazardous waste is collected by Cleansing Service Group Ltd, CSG Coventry Treatment Plant, Colliery Lane, Bayton Road Industrial Estate, Exhall, Coventry, Warwickshire, CV7 9NW.

Mixed municipal waste and segregated cardboard

- The site generates mixed municipal waste and some separately collected cardboard waste.
- The municipal waste is stored in a covered FEL container and is collected weekly using a compactor vehicle.
- The cardboard is stored in a lidded 1100 litre eurocart. This is emptied weekly using a compactor vehicle.
- The mixed municipal waste skip and cardboard eurocart are located within the haulage yard in a designated skip storage area co-located with waste metal skips and waste wooden pallets and waste IBCs.
- The mixed municipal waste and the cardboard waste is collected by
Wm. M Briers & Son (Tamworth) Ltd, Anchor Sidings, Glascote Road, Tamworth, Staffordshire, B77 2AN.

Female hygiene waste

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- The hygiene waste generated from the female toilets is collected four weekly by PHS, Forties, Two Gates, Wilnecote, Tamworth B77 5DQ.

Small mixed WEEE

- A small amount of WEEE is accepted onto site (*see Table 2.3*). This is typically electronic components that contain precious metals e.g. circuit boards and engine control units. These wastes are stored temporarily on site and dispatched to suitably permitted hazardous waste treatment site.
- The small mixed WEEE materials are shipped to Sweep Kuusakoski Limited, Gas Road, Sittingbourne, Kent, ME10 2QB.

2.2 Other activities on site and other combustible materials.

- Other activities on site include company administration, engineering maintenance and chemical analysis of catalyst powders.
- The Commercial team operate as lone workers visiting customers' sites around the UK. Therefore, the team are usually absent from site typically attending site one day in a fortnight.

Compressed gas canisters and plasma cutter

- Compressed gas canisters are used on site. These include liquid petroleum gas (*LPG*) used to fuel LPG powered forklift trucks and welding gas for welding. Technical grade Argon and Technical Grade Oxygen bottles are also used for the ICP machine and the carbon analyser. The gas canisters are stored outside in the haulage yard in a locked metal cage adjacent to the metal waste skips.
- The LPG bottles are used to power LPG forklift trucks. The bottles are exchanged outside in the yard area. When not in use it is a site requirement that the gas supply from the gas bottle to the forklift is turned off.
- The engineering department uses one 71kg bottle of welding gas (*Argon IO2/ O2*) in the engineering workshop for welding. The sampling area has two plasma cutting bays for large catalytic convertors. The areas used for welding and plasma cutting are served with Local Exhaust Ventilation and suitable screens to separate the hot works from other operations on site.
- Inside the Laboratory are 2 x Technical Grade Argon and 1 x Technical grade Oxygen bottles, which are secured by chains and signage.
- The gas bottles are supplied and collected by:

Seaton Heating & Engineering Services Ltd, Wilnecote Lane, Tamworth,

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Staffordshire, B77 2LE.

Site layout of where gas bottles are stored can be found on “*GEN197 – Map for Emergency Services on site*”

Ovens for drying catalyst samples.

- The sampling area has one oven that is used to dry the biscuits of catalyst prior to weighing them in order to determine the weight of precious metal containing catalyst media in given catalytic convertors.
- The laboratory has one oven that is used for moisture determination loss on drying (*LOD*) the Laboratory is also equipped with three muffle furnaces which is used for loss of ignition (*LOI*). Both the oven and furnaces are subject to annual calibration by an approved contractor.

Cabinets for storing substance hazardous to health.

- The Control of Substances Hazardous to Health Regulations 2002 (*COSHH*) requires employers to prevent or reduce worker’s exposure to hazardous substances. One of the control measures is the use of secure metal cabinets to store substances hazardous to health e.g. solvents and spray paints. There are suitable and sufficient COSHH cabinets on site in the appropriate areas. Spray paint marking is used to identify individual batches of catalytic convertors (*lots*) to enable them to be identified prior to de-canning.

2.3 Storage volumes by site Area

- Techemet operate a stage process where materials flow through the site from one area to the next in an efficient sequence to allow optimal processing and storage. The areas are shown in figure 1.1.3 and figure 1.1.4 shows the relative location of the storage including No of pallets in each area Table 2.3 below details the main types of materials and the total available storage quantities of the materials

Table 2.3 Storage volumes by Site Area

Storage Location	Material	Cont Type	No Cont	Te/M3
Prep	Ungraded Cats	Pallets/IBC	120	120
Prep	Ungraded Cats	Hoppers (largest cont)	120	288
Process Area	Stainless	Pallets/IBC	296	296
Process Area	Mixed - Pre Sampler	Pallets/IBC	50	50
Process Area	Ceramic/DPF	Hoppers	100	240
Sampler & Plasma Area	Ceramic/DPF	Pallets/IBC	16	16

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Sampler & Plasma Area	Mixed - Pre Sampler	Pallets/IBC	25	25
Despatch Area	Misc material (mostly Catalyst)	Pallets/IBC	160	160
Despatch Area	RCF	Pallets/IBC	40	40
Yard - 40 Foot Container	Misc material (mostly Catalyst)	Pallets/IBC	44	44
Testing and Engineering	Misc Cats for Sample and Grade	Pallets/IBC	20	20
Total across all area			991	1299

2.4 Maximum quantity and storage duration of waste materials

- Techemet wish to maintain flexibility of storage to account for seasonal variations inputs. As shown in section 2.3 the site has a storage capacity of 638 Pallets/IBC/Hoppers with an m3 capacity of 718. Table 2.4 below the maximum typical and maximum storage amounts of the different types of waste accepted on site. Please note the maximum storage amounts account for flexibility in allocation of storage areas – at no time with Techemet exceed the total maximum storage on site across all area or the maximum amount for an individual waste in table 2.4 below.
- Note the majority of materials on site are not combustible as they are metallic and inert in nature.

Table 2.4 Combustible Materials: Maximum quantity and duration limits

Waste Type	Max storage time	quantity (tonne) Typical/ Max¹	quantity (m ³) Typical/ Max¹	Combustible	Comments
Ungraded catalytic convertors	4 weeks	300 408	240 588	No	Ungraded catalytic convertors are not combustible but may be packaged in combustible packaging e.g. one tonne bags on wooden pallets.
Graded catalytic convertors (Ceramic and DPF)	4 weeks	191 400	191 400	No	Graded catalytic convertors are not combustible and are contained in metal tipping containers.

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De-canned material	4 weeks	50 400	50 400	No	Misc de-canned material (stored pending further processing and sampling)
Stainless cans	4 weeks	296 400	296 400	No	Stainless steel cans stored in bags or IBCs
Small mixed WEEE	4 week	4	4	Yes	Stored in one tonne bags or repurposed IBC. Combustible.
Misc High Value & Precious Metal Wastes	2 weeks	1-100kg 5	0.1 5	No	Stored in drums and one tonne bags. These materials are inorganic in nature and non-combustible.
Refractory linings	4 weeks	20 40	44 88	No	Delivered in drums if incoming RCF produced 24x 300kg (24m3)
ELV batteries	4 weeks	3	3 battery bins	Yes	Stored under cover in sealed dolav
Ferrous metal	2 weeks	60	60	No	Emptied catalytic conveyor shells. Stored in skips or IBCs/bags pending loading into skips Not combustible.
Mixed municipal	2 weeks	2	4	Yes	One covered skip in haulage yard.
Drummed hazardous	4 weeks	2	3	Yes	Maximum of six 205 litre drums. Stored on secondary containment bunds
Cardboard	2 weeks	0.25	1.1	Yes	One 1.1m3 eurocart in haulage yard
Wooden pallets (non-waste)	4 weeks	3	8	Yes	Stored in external yard in miscellaneous area
Empty IBCs	4 weeks	3	15 (note hollow)	Yes	Repurposed IBCs reused or disposed of as ferrous metal stored in haulage yard.

¹ Typical storage is in Black text and maximum in **Red** section with just black text indicate the

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maximum amount

- Please note the principle business of Techemet is the treatment of automotive catalysts. The facility storage has been designed principally for these wastes. The other wastes listed in table 2.4 where they do not otherwise have a dedicated storage location will take up a pallet space of the auto cat wastes in the relevant storage area

3.0 Sensitive receptors within a 1km radius of the site that could be affected by a fire

3.1 Residential areas, workplaces

- The site is in a built-up area and is surrounded by a large number of human occupied buildings within 1 km of the site boundary. The site is on an industrial estate surrounded by housing estates. The distances from the site boundary to the nearest occupied buildings or public open spaces are shown in Table 3 below.

Table 3 Distance from the site's boundary to human occupied buildings and open spaces

Distance from the Site's boundary (m)	Description of building or open space
1	Factory Aluglaze Systems Ltd / Alucraft Systems Ltd
3	Main Road Ninian Way, Tamworth
30	Private Dwellings flats off Ninian Way accessed by Torrent Close, Tamworth.
70	Railway Line

Note. 1. The distances were taken from the UK Grid Reference Finder website's distance measurement tool which was accessed on 17th August 2020
<http://gridreferencefinder.com/>

- The proximity to regularly occupied buildings, public open spaces and surface waters is shown below:

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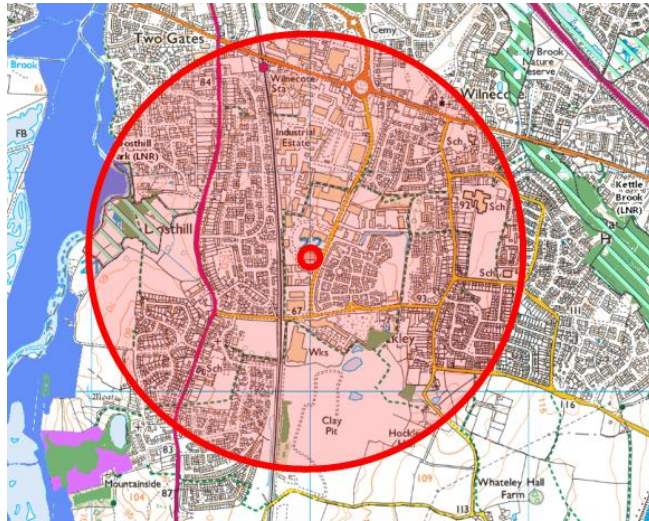


Fig. 3.1 One km radius of the site

- Regularly occupied buildings and public open spaces within 1km of the site are sensitive receptors that could be affected by a fire on site. The plan to notify residents and businesses that may be affected by a fire on site is outlined in Section 6.3 below.

3.2 Protected habitats, watercourses, groundwater, boreholes; wells and springs supplying water for human consumption

The Site's proximity to important nature conservation sites

- Important nature conservation sites are designated under the Habitats Directive and the Countryside and Rights Way Act 2000 (CROW). Sites designated under the Habitats Directive include: RAMSAR sites, Special Areas of Conservation, and Special Protection Areas. Sites designated under CROW include Sites of Special Scientific Interest.
- The MAGIC website is an internet based interactive mapping service which brings together environmental information from across government and is managed by Natural England (Ref. <http://magic.defra.gov.uk/>). A review of Natural England and Defra information on this website confirmed that the site is not within 1 km of an important CROW site or of a Habitats Directive site (Ref. <https://designatedsites.naturalengland.org.uk/>).
- The MAGIC website showed that the Kingsbury Brickworks Site of Special Scientific Interest is approximately 1.5 km south of the site. In addition, one local nature reserve (LNR), Dosthill Park LNR, is less than one kilometre to the west of the site. Three other nature reserves are within two kilometres of the site. These include Tameside LNR, Middleton Lakes LNR and Kettle Brook LNR. The LNRs contain areas of deciduous woodland. The Middleton Lakes LNR contains an area of floodplain grazing marsh and is adjacent to a reserve managed by the Royal Society for the Protection of Birds (RSPB).

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- Therefore, there are no sensitive conservation and habitat areas within 1km of the site that could be affected by a fire on site. Although a fire on site could adversely affect the amenity value of the LNRs for a period of time.

The Site's proximity to important Groundwaters and Aquifers

- The MAGIC website shows that the site is within a Nitrate Vulnerable Zone as is much of the surrounding area including all of Tamworth (Ref. <http://magic.defra.gov.uk/>).
- The MAGIC website shows that the site is not underlain by a productive aquifer and is not within a Groundwater Source Protection Zone.
- The site is within a High Vulnerability Groundwater Zone. Local groundwater is therefore considered to be sensitive receptors for potential fire water runoff (Ref. *MAGIC website accessed 17th August 2020 16:36 hrs*). Water pollution control measures will be implemented.

The Site's proximity to important surface waters

- The MAGIC website (Ref. <http://magic.defra.gov.uk/> accessed on 17th August at 16:46hrs) shows that the topography of the surrounding area slopes down towards the west. This suggests that surface water from the site would flow westward towards and probably into the Middleton Lakes and Dosthill Park LNRs which are less than 1.5km due west of the site. Therefore, the Middleton Lake and Dosthill Park LNR are considered to be sensitive receptors for potential fire water runoff. A plan for managing fire water on site is described in section 6.5 below.

The Site's proximity to the Flood Plain

- The Environment Agency's flood risk maps (Ref. <http://magic.defra.gov.uk/> accessed 20th November 2024) indicate that the site is not within a flood risk zone. Therefore, flood risk is not expected to increase the adjacent surface waters sensitivity to fire water runoff

The Site's proximity to the Air Quality Management Zone

- The site is within Tamworth Borough Council's area which has no current Air Quality Management Zones. Therefore, a local AQMZ is not a sensitive receptor within 1km of the site that is likely to be adversely affected by a fire on site.

3.3 Roads, railways, waterways, bus stations, pylons (on or immediately adjacent to the site).

- The site is immediately adjacent to Ninian Way, Tamworth. Traffic on this road could be adversely affected by a fire on the site as would traffic within the wider industrial estate.
- A railway line runs 70m to the west of the site. Trains using this railway line into and out of Wilnecote Station may be adversely affected by a fire on the site.

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- Local transport infrastructure could be adversely affected by a fire on the site.

4.0 Possible causes of fire on site

4.1 Arson

- Arson is a possible cause of fire on the site. Extensive security measures are in place to limit the risk of arson.
- The site is surrounded by a 2.5m high steel palisade fence topped with metal spikes to deter intruders. Two vehicle access gates remain closed at all times other than for scheduled deliveries or scheduled shipments of wastes off site.
- A network of CCTV cameras monitors the whole of the site (*indoor and outdoor*) 24 hours per day. The CCTV cameras are monitored by office staff during the site's normal opening hours. At other times the cameras are monitored externally. The camera network is linked to the internet to enable remote monitoring of the site.
- Intruder alarms are installed in all buildings as well as the workshops. All mobile plant is stored overnight within the buildings.
- An approved security contractor holds keys to the facility entrance gates. Scheduled patrols are conducted throughout non-operational times including weekends and bank holidays. The contact details of site key holders are listed on "*GEN196 – Emergency Telephone Contact List*".
- Weekly perimeter checks carried out by personnel to check for arson via TechCheck.

4.2 Plant and equipment

- Faulty plant and equipment is a possible cause of fire on site. A comprehensive maintenance and inspection programme (*Shire System and planned maintenance with approved contractors*) is in place to maintain the site's plant and equipment to a high standard. Service schedules can be found on the Shire System and "*GEN383 – Techemet Year Planner*".
- An in-house engineering team focus solely on maintaining and inspecting the waste treatment equipment on site. The in-house engineering team is supplemented by specialist sub-contractors tasked with inspecting and maintaining specialist pieces of plant. Typically, the specialist pieces of equipment are maintained by the equipment's suppliers under the terms of a maintenance agreement.
- An annual insurance company inspection is undertaken. This includes a review of the condition of the plant on site including the adequacy of the maintenance processes.

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- Regulatory inspections are undertaken by specialist sub-contractors. These inspections include those required for compliance with:
 - Provision and Use of Work Equipment Regulations 1998
 - Lifting Operations and Lifting Equipment Regulations 1998
- The plant and equipment on the site is listed in the company's "GEN132 - Asset Tag Register" stored on the Companies S://Drive.
- The maintenance records for all plant and equipment are stored electronically on the company's S://Drive.
- All mobile plant and equipment is subject to daily/ weekly/ monthly or pre-use inspections by the appropriate employees. These inspections are recorded electronically with the Techemet's reporting software TechCheck.
- Mobile plant when not in use is stored in designated parking areas away from combustible materials within the processing area.

4.3 Electrical faults including damaged or exposed electrical cables

- Electrical faults are a possible cause of fire on site.
- The site's electrical wiring and equipment is maintained and inspected by a specialist sub-contractor.
- The approved contractor is contracted to test and maintain all electrical circuits on site. As part of the contract the electrical contractor is on call for all electrical issues identified.
- An approved contractor undertakes annual PAT testing of portable electrical equipment used on site. Reports of inspections are saved on the Companies S://Drive.
- The electrical equipment's maintenance records are stored on the company's S://Drive.
- Techemet's IT department is responsible for installing and maintaining the site's IT infrastructure.

4.4 Discarded smoking materials

- Discarded smoking materials are a possible cause of fire on site. The company provides a designated smoking area, no smoking is allowed outside of the designated area.
- All horticultural wastes are removed off site by the landscaping contractor.

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4.5 Hot works safe working practices

- Hot works are a possible cause of fire on site. The site operates a hot works permit to work system. This prohibits hot works onsite other than pre-planned works supported by a risk assessment and method statement incorporating a fire watch extending for 1 hour after hot works have ended. Permission may only be granted with the express authority of a member of the Management team.

4.6 Industrial heaters

- The incorrect use of industrial heaters is a possible cause of fire on site.
- The industrial heaters are controlled by personnel, and are operated by timer system.

4.7 Hot exhausts

- Hot vehicle and plant exhausts are a possible cause of fire on site.
- The plant manager undertakes weekly walk around inspections to check for potential health and safety and fire risk issues. The weekly walk round inspections observe compliance with safe working practices and look for potential fire risks. These inspections are logged on ***Tech Check under Internal Building Inspection.***

4.8 Ignition sources

- Space heaters, hot exhausts and other sources of ignition are potential causes of fire on site.
- The site's layout is arranged so combustible and flammable wastes are stored 6m away from potential ignition sources unless separated by fire protection barriers in which case the segregation distance may be reduced.

4.9 Waste batteries

- ELV batteries are stored on site. The waste batteries are combustible and a potential source of fire on site.
- To minimise batteries' potential fire risk they are stored in lidded leak proof containers on impermeable concrete hardstanding in the dispatch area pending removal from site.

4.10 Leaks and spillages of oils and fuels.

- Areas vulnerable to leaks and spillages of oils and fuels are potential sources of fire on site.
- There is a risk of fuel/oil spillage from delivery vehicles while they are on site.

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- To control this potential fire risk all, plant that could leak flammable fluids are regularly inspected. Spillages may be observed as staining on hardstanding areas during the daily walkover inspections.
- The site has well established accident and spill response procedures described in the site's Environmental Management System. "*CPRO52 – Accident and Incident Report Procedure*" & "*CPRO65 – Spill Response Plan*".

4.11 Build-up of loose combustible waste

- The build-up of loose combustible waste is a potential fire risk on site.
- The Management team daily visual walkover inspections include observations for litter and incorrectly stored waste materials that could cause this type of fire risk. Loose combustible waste types include broken wooden pallets and used one tonne bags. These are produced in relatively small volumes on site therefore it is a low fire risk. Waste one tone bags are baled to reduce the volume of waste to be disposed of. Baled waste is stored on a wooden pallet in the haulage yard.

4.12 Reactions between wastes

- ELV batteries have the potential to ignite flammable and combustible wastes on the site.

4.13 Deposited hot loads

- No hot loads are permitted on the Site. If a hot load was delivered to the site in error this would be rejected and logged on the "*GEN195 – Site Diary*".

5.0 Measures to minimise fire risk

5.1 Prevention of self-combustion

- **Waste storage** -A schematic plan showing the position of the site's waste storage areas is shown in *GEN197*.

Monitoring and control of wastes temperature

- A daily site walkover by a member of the Management team is used to monitor the safety of waste management activities on site. This includes observations of waste storage and associated fire risks.

Management of storage time

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- The site's operations are designed to treat catalytic convertors on a first in first out basis. Empty catalytic convertor shells are removed from site several times a week. Other wastes tend to be removed on a monthly basis once enough material for a haulage load has been accumulated. Therefore, most catalytic convertors entering site are processed within one month.

Please refer to GEN197-Poster-Reference Map for Emergency Services on Site.

5.1.2 Access to waste storage areas

- All wastes removed from site are collected from the haulage yard.
- The main access gate into Techemet's waste treatment facility leads into the haulage yard. This hardstanding area provides direct access to the waste storage, treatment and dispatch areas. The site layout is shown in *GEN197*.
- Wastes catalyst powders and RCF are stored in one tonne bags on wooden pallets in the dispatch building. Once sufficient material is accumulated a road haulage container is brought to site and immediately loaded. The loading is typically completed within two hours of the container arriving on site.

5.2 Detecting Fires

- Fire detection includes visual observation by site staff. Site staff are made aware of the fire extinguishers' locations "*GEN376 – Fire Extinguisher locations*" and the fire alarm drill notice is in the Foyer area of the building for their work areas as part of their site induction process. Monthly Fire extinguisher audits are completed by trained fire wardens and logged on Tech Check. 6 monthly fire drills are conducted to ensure employees are aware of what to do in the event of a fire.
- The site's extensive array of CCTV cameras is used to detect signs of fire. The CCTV network operates 24 hours per day and is observed on numerous monitors within the site. An alarm is immediately raised if any potential incident is spotted with investigations carried out immediately by supervisors and the Operations Department. Any member of staff can call the emergency services in the event of a potential incident.
- The site's buildings contain a number of smoke detectors "*GEN382 - P1 Detection zone plan*". The fire alarm system is checked and tested on a weekly basis and written records are kept. The fire alarm system including fire detectors and sounders are supplied and maintained under the terms of a supply, inspection and maintenance agreement with:

Chubb Fire and Security Ltd

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5.3 Suppressing Fires

- Most wastes awaiting collection are stored outside in the haulage yard '*cardboard/ scrap metal/ general waste/ pallets/ used bulk bags*'. These wastes are contained in suitable and sufficient skips/ bins.
- Catalytic convertors awaiting processing and recovered catalyst are stored inside the treatment and dispatch buildings respectively. Indoor storage areas are supplied with numerous fire extinguishers. Catalytic convertors and catalyst are not combustible therefore the use of fire extinguishers is considered adequate for initial firefighting in these areas.
- Three types of combustible wastes are stored within the treatment and dispatch areas. Drummed hazardous waste is stored in the treatment area, and ELV batteries, and small mixed WEEE are stored in the dispatch area. The total amount of these combustible wastes stored on site at any one time is relatively small. The use of fire extinguishers is adequate for initial firefighting targeting combustible wastes stored in one of the buildings on site. The locations of the fire extinguishers are detailed in "*GEN376 – Fire extinguisher locations*".

5.4 Preventing Fire Spread

5.4.1 Separation Distances

- Discarded packaging wastes are stored externally in the haulage yard. These include mixed municipal wastes in a covered waste skip and wooden pallets stacked in neat piles awaiting collection. Discarded IBCs are also stored externally prior to disposal. The above combustible wastes are positioned more than 6m away from the buildings on site.
- ELV batteries are contained in covered leak proof dolvas. During the day when the site is operational the ELV batteries' covered dolavs are stored externally in the haulage yard next to the door buy area. This is to facilitate the immediate safe storage of ELV batteries delivered to site via the door buy route. The ad hoc delivery of small numbers of ELV batteries is the most common means by which ELV batteries are accepted onto site. The ELV batteries' covered dolavs are stored in the dispatch building when the site is closed. The full dolavs are removed off site promptly such that there typically no more than two dolavs of ELV batteries on site at any one time.
- Small mixed WEEE containing precious metals are infrequently accepted onto site. These include circuit boards and ELV engine control systems. These materials are typically received in either one tonne bags on wooden pallets or are contained in repurposed IBCs. These materials are stored in the dispatch area pending transport offsite to a suitable recycling facility. These items are not treated on site.
- Flammable gases are stored externally in a secure metal cage in the haulage yard and the Laboratory. For security reasons the cage is positioned next to the treatment building, with

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correct signage provided. The cage is separated from combustible wastes stored externally by the width of two scrap metal (*catalytic convertor shells*) containing ro-ro containers.

- Flammable liquids are stored in locked metal COSHH cabinets around the site.

5.4.2 Fire walls and bays

- The buildings on site are a combination of single storey brick structures comprising: offices, laboratory and store rooms incorporated into steel clad portal frame structure with brick curtain walls. Brick wall partitions are used to demarcate separate parts of the site e.g. offices, laboratory, canteen, waste treatment area, sampling area, and dispatch area. A firewall separates the offices from the factory floor. The laboratory is fitted with 1-hour burn time firewalls and ceiling.

5.4.3 Quarantine Area

- There is a designated area for quarantining of certain material.

5.5 Fire response and fire evacuation training

- Employees are trained in the use of fire extinguishers and emergency procedures. A number of site staff are trained as fire wardens. Fire Warden Fire Action notices are posted at all fire extinguisher and fire alarm points. “GUID65 – Fire Emergency plan and information for fire and rescue services”. “GUID66 – Information for Emergency Services on Site”.
- The duties of specific staff in an emergency are communicated by work instructions and via posters on site notice boards.
- Fire drills are regularly practiced and records of fire drills are kept on the Company S://Drive. Fire drills are arranged to:
 - Test employee’s response times to fire alarms;
 - To practice evacuation drills; and
 - To reinforce the importance of fire risk management.
- Feedback and observations from the drills are recorded and used to inform the fire response procedures and the planning of future fire drills. Fire drill records are kept in the main administration office. Reports of the fire drills are saved:

Corporate Services\Health & Safety\Fire safety, records, drills and info\Fire Drills and Evacuations

6.0 Firefighting plan

6.1 Firefighting techniques

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- The firefighting plan will aim to extinguish a fire within 30 minutes were possible.

The fire brigade and the Environment Agency will be notified as soon as practicable.

- The burning area will be isolated and attempts will be made to extinguish the fire utilising the site's fire extinguishers if safe to do so. Firefighting media and/or water will be applied to the fire. Unburnt material will be removed from the area of the fire and burning material will be placed in the quarantine area if safe to do so. Burning material in the quarantine area could be left to burn out if appropriate to do so.
- Contaminated site drainage will be prevented if possible from entering any unsurfaced ground.
- This approach to firefighting requires an appropriately designed and built waste treatment site operated by well trained staff, supplied with suitable safety equipment, firefighting equipment and robust well maintained plant able to move burning and unburnt wastes safely and quickly.
- Water for firefighting can be supplied by a fire hydrant at the site boundary on Ninian Way, as shown below:

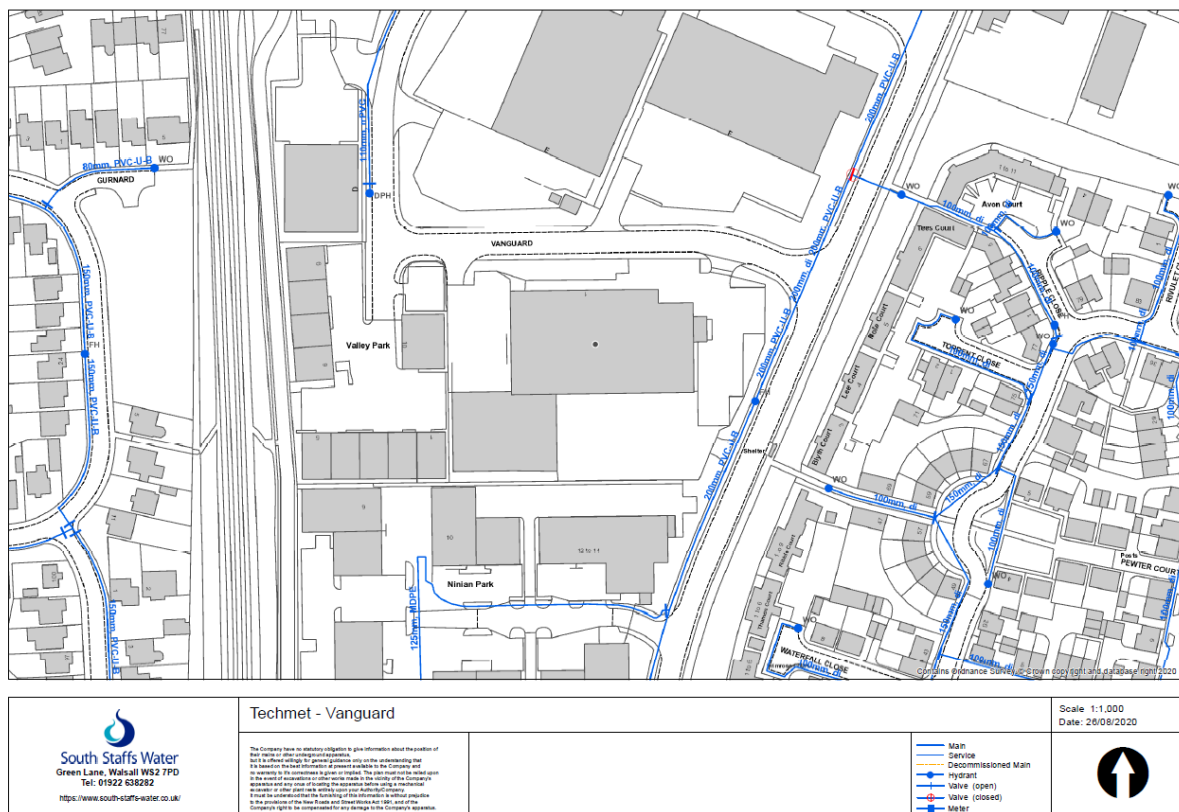


Fig 6.1 Fire Hydrant Locations

- The site will be evacuated if the fire is not containable.

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6.2 Contingency plan

- Techemet's waste treatment is monitored with rigorous material tracking processes that are recorded digitally. The digital records are backed up each day to offsite servers. Therefore, the IT infrastructure and the associated process and materials management systems can be quickly re-established following a serious fire incident on site.
- The catalytic convertor materials processed on site are not combustible and so the materials being processed and those awaiting dispatch would be recoverable following a fire.
- Much of the waste handling equipment used on site is industry standard equipment and could be readily replaced e.g. weigh scales, forklifts.
- Specialist equipment is used to de-can catalytic convertors. This bespoke equipment could not be replaced quickly as it would need to be fabricated. However, off the shelf de-canning equipment can be purchased or hired as an interim measure while the bespoke plant is fabricated. The commercially available equipment is not as efficient as the equipment designed and fabricated in-house but is suitable to enable the company to quickly re-establish treatment following a fire if bespoke equipment was irreparably damaged. Techemet's parent company in North America uses similar bespoke treatment equipment and one further option would be to import treatment equipment from the North American site.

6.3 Notification of residents and businesses

- A number of residents and local business would be affected by a fire at the site because there are a number of residents and businesses within a 1km radius of the site. Techemet Ltd will contact local residents and businesses to ask their permission to hold their contact information so that they can be contacted directly should the need arise following a fire on site.

6.4 Water supplies

- Information describing the location of the site's nearest fire hydrants was supplied by South Staffordshire Water.

6.5 Managing fire water

- The site has an impermeable concrete hardstanding in the courtyard/loading area that is drained via an oil water interceptor. The impermeable hardstanding prevents the uncontrolled release of surface water to groundwater or unmade ground. The oil water interceptor provides some treatment of potentially contaminated surface water before its discharge off site.

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- Site personnel undertake regular monitoring of the oil water interceptor. The interceptor is fitted with an electronic oil level monitor that produces an alarm when the interceptor requires emptying because sufficient oil has been collected. The oil interceptor is emptied once every six months before sufficient oil is collected to trigger the oil level alarm.
- In the event of a fire the surface water drainage system would be overwhelmed and the treatment capacity of the oil water interceptors would be exceeded. Therefore, during a fire event the surface water drainage system's outfall will be blocked to prevent contaminated surface water being discharged off site. Water will be directed to the dock leveller which is a sealed concrete pit with a capacity of 19.8m³ the fall of the internal site external area is toward the dock leveller which will act as a fire water storage sump
- The surface water outfall will be blocked with the use of propriety bladder type drain block.

7.0 Post fire clean up

- Following a fire on site the area affected would be cleaned up to enable waste treatment operations to resume. The clean-up process will initially involve the clearance and disposal of damaged and contaminated materials.
- Hardstanding areas would be cleaned and drainage systems would be water jetted and gullies and interceptors emptied with vacuum tanker vehicles. Once cleaned the sewerage infrastructure would be inspected with CCTV equipment to check its structural integrity. Similar integrity checks would be required for other utilities in and around the areas affected. Repair or replacement of utilities may be required.
- Areas of bare earth and or permeable hardstanding will be investigated to determine the extent and significance of land contamination resulting from the fire and or firefighting chemicals. Some contaminated land remediation may be required, and possibly some groundwater remediation. The extent of any land clean up would be informed by the site's ongoing use.
- Once buried services have been repaired or replaced and contaminated land issues dealt with then hardstanding areas would be repaired. Damaged above ground site infrastructure will then be repaired or replaced.

8.0 Site improvement programme

- A programme of site improvement works to enhance Techemet's ability to prevent, contain and quickly extinguish potential site fires includes the following:
 - Review the work permit and hot works permit systems to reflect the fire prevention plan requirements;

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- Upgrade the surface water drainage filters outfall to enable the drainage to be more quickly blocked to prevent the offsite discharge of fire water;
- Improving signage on site including high level signs above all fire extinguisher locations
- Improved floor markings demarcating segregated waste storage areas and forklift and cleaning equipment parking areas.

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