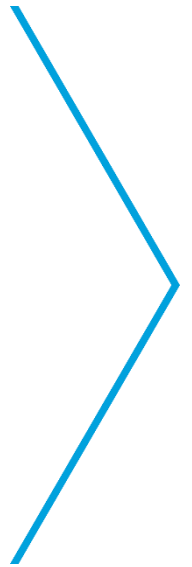




Recovered Fiber

FIRE PREVENTION PLAN

Birmingham depot



CONTENTS

1 Introduction

- 1.1 Introduction
- 1.2 Structure of the Fire Prevention Plan
- 1.3 Status of the Fire Prevention Plan

2 SITE BACKGROUND

- 2.1 Site Setting
- 2.2 Combustible Waste
- 2.3 Other Combustible Materials

3 FIRE PREVENTION PLAN

- 3.1 Control of Potential Causes of Fire
- 3.2 Preventing Self-Combustion
 - 3.2.1 Managing Storage Time
 - 3.2.2 Monitor and Control Temperature
- 3.3 Manage Waste Piles
 - 3.3.1 Maximum Pile Sizes
- 3.4 Prevent Fire Spreading
 - 3.4.1 Separation Distances
 - 3.4.2 Fire Walls and Bays
 - 3.4.4 Quarantine Area
- 3.5 Detecting Fires
- 3.6 Fire Fighting Techniques
- 3.7 Water Supplies
- 3.8 During and After an Incident
- 3.9 Water Supplies
- 3.10 Managing Fire Water
- 3.11 Attendance by the Fire Service
- 3.12 During and After an Incident

1 INTRODUCTION

1.1. Introduction

Smurfit Westrock Recovered Fiber has prepared this document for the operation of their paper and cardboard recycling facility located in Birmingham, West Midlands.

Smurfit Westrock are a leader in paper and cardboard recycling in both the UK and globally.

The document provides a structured framework and approach in effectively preventing potential fire associated with the processing and storage operations at the site.

This Fire Prevention Plan document (referred hereafter as the 'FPP') has been produced in accordance with the updated Environment Agency's Fire Prevention Plan Guidance published 29th July 2016 and updated 11 January 2021.

1.2 Structure of the Fire Prevention Plan

This FPP has been structured in accordance with the EA Fire Prevention Plan Guidance and considers the following relevant aspects of the facility

- Managing common causes of fire
- Preventing self-combustion
- Managing waste piles
- Preventing fire spreading
- Quarantine area
- Detecting fires
- Suppressing fires
- Firefighting techniques
- Water supplies
- Managing fire water
- During and after an incident

1.3 Status of the Fire Prevention Plan

The Fire Prevention Plan is a standalone document, however, is linked with both the Non-technical summary and Integrated Management System and is made available to all staff and relevant contractors and visitors to the site. All monitoring procedures, responsibilities and compliance actions will be updated as and when required.

2 SITE BACKGROUND

2.1 Site Setting

Smurfit Westrock Recovered Fiber operate at Duddeston Mill Road, Saltley, Birmingham situated East of Birmingham city centre and is surrounded by a mixture of different land uses. The nearest residential properties are located on 50m to the east of the site boundaries.

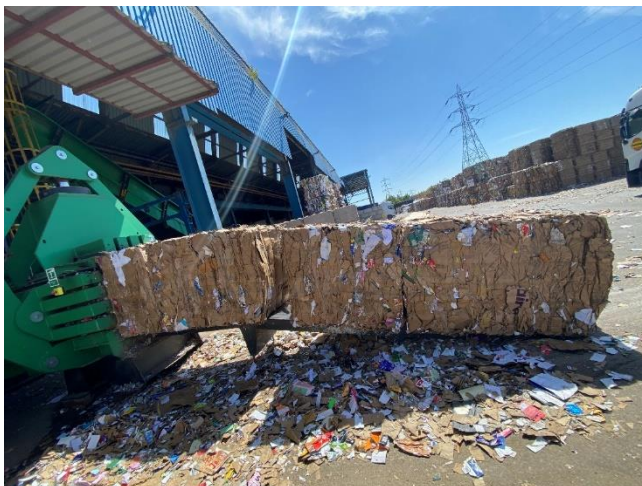
Processing activities onsite can be summarised into the following areas –

- Receipt and transfer of waste paper and cardboard.
- Receipt and storage of waste plastic packaging.
- Mechanical sorting of paper and cardboard.
- Baling of paper and cardboard.
- Storage of baled paper and cardboard.

Material being processed onto conveyor belt in loose form.



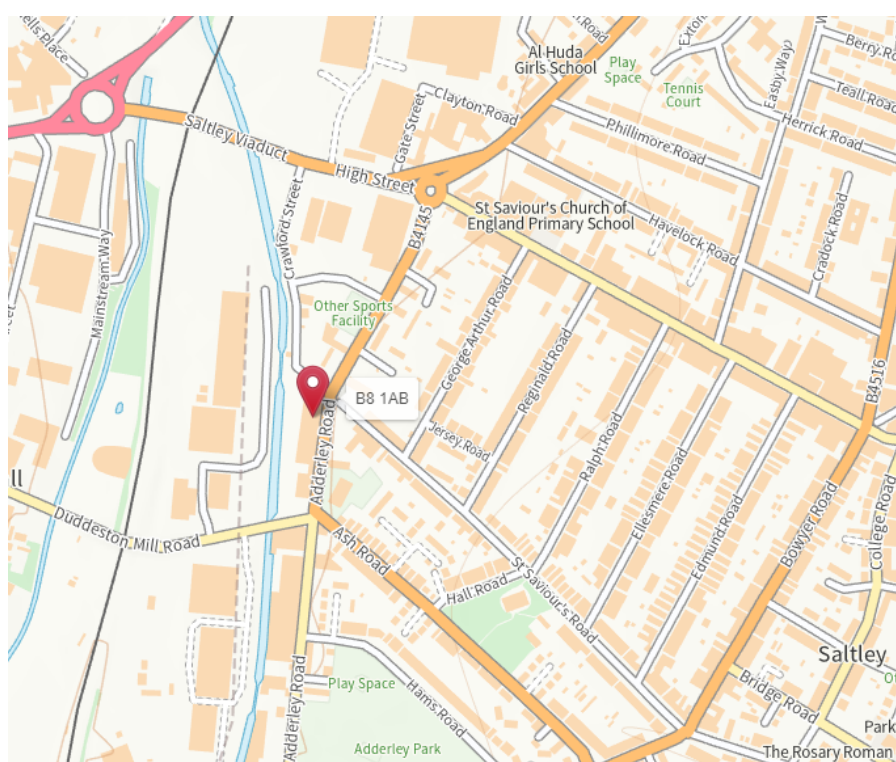
Bales exiting into yard



Recovered Fiber (paper and cardboard) is received at the site in either loose or a baled format. Baled paper and cardboard may be unloaded outside the buildings, but loose paper and cardboard will always be unloaded within the designated areas close to the conveyors ready to be processed. Any splitting of baled waste will also take place within the production area, away from main tipping/ loading bays with maximum storage for no longer than 90 days.

The facility currently is regulated in accordance with the requirements of the Environmental Permitting Regulations under Waste Exemptions - S2 waste exemption: storing waste in a secure place and T4 waste exemption: preparatory treatments, such as, baling, sorting, shredding, registration number – WEX393078.

The location of the subject Site is shown on Figure A1, Annex A, centred at approximate National Grid Reference SP 09455 87914.



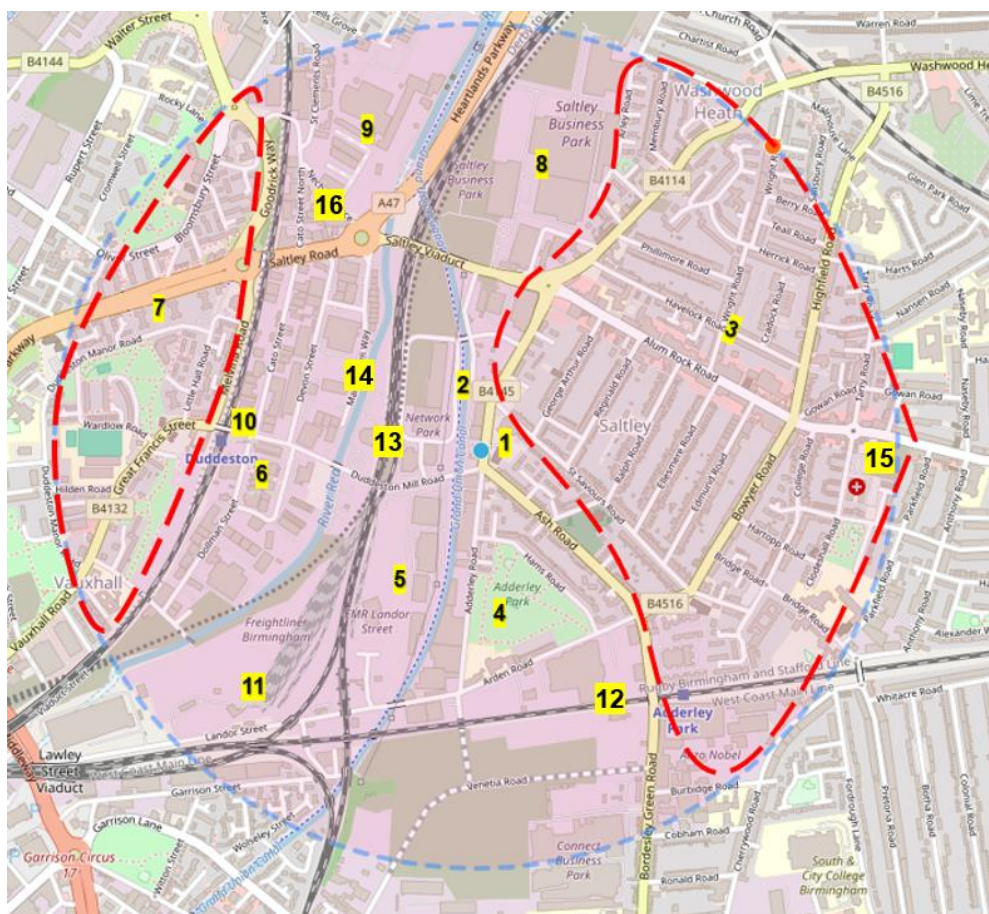
The site layout can be found in Annex A–Site Plans.

Table 2.1 below provides information regarding the surrounding site.

Direction	Description
North	Light commercial
North East	Light commercial and residential
East	Residential
South East	Residential
South	Light commercial/ local wildlife site/ residential
South West	Light commercial/ local wildlife site
West	Light commercial/ local wildlife site
North West	Light commercial/ local wildlife site

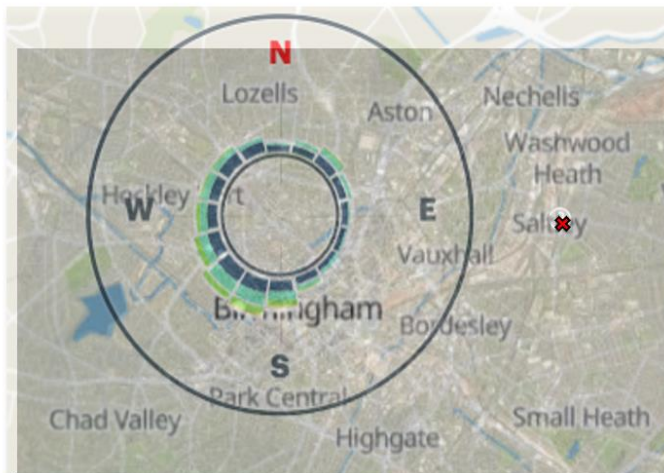
Sensitive Receptors

Ref	Receptor	Description	Direction from site boundary	Approximate distance from Site Boundary (m)
1	Mosque/ school	Community/ Religious centre	E	50
2	Grand union canal	Protected site/ area	W	50
3	Dwellings	Area East of site (highlighted)	E	50 - 1000
4	Playing fields	Communal park space	S	350
5	Business park	Duddeston mill trading estate	SW	300
6	Business park	Vauxhall trading estate	W	500
7	Dwellings	Area West of site (Highlighted)	W	650
8	Business park	Saltley business park	N	650
9	Paper Mill	Smurfit Westrock Paper Mill (SSK)	NW	700
10	Railway	Duddeston Railway station	W	500
11	Railway	Freightliner terminal station	SW	800
12	Railway	West coast main line	S	900
13	Railway	Rugby/ Birmingham main line	W	350
14	River Rea	Water source	W	400
15	Medical centre	Community medical centre	E	1000
16	Dual carriageway	Saltley Rd – Heartlands Parkway	NW	700



Receptors have been identified so far as reasonably practicable, some local receptors may exist but will exist under the relevant receptor allocation.

Prevailing wind direction



Wind data from 2012 – 2024 show wind direction predominantly West, Southwest.
Site location marked

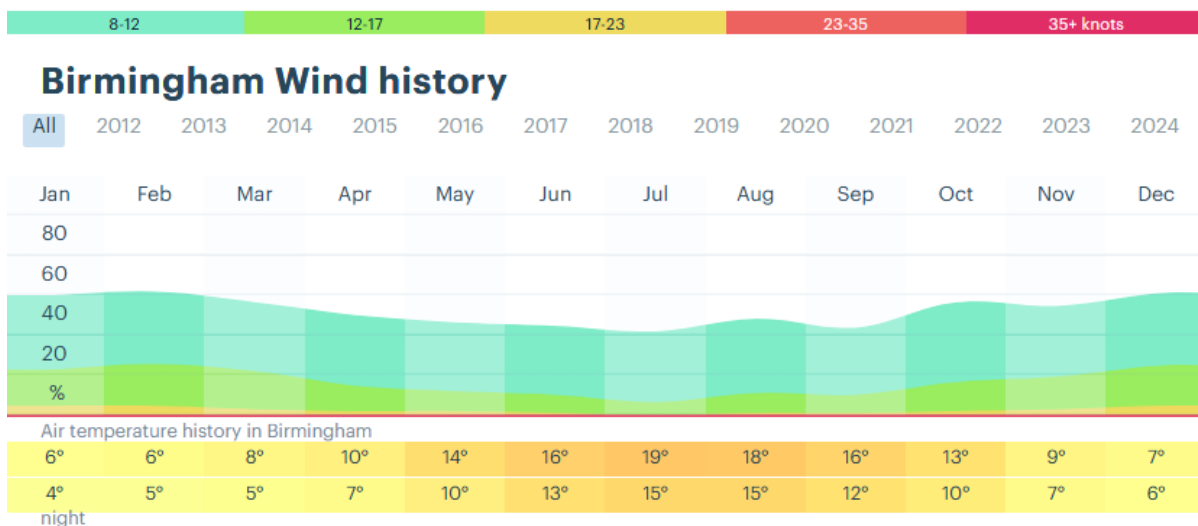
Wind data measured at 5.79 away from selected destination, site is located 3.09km East of area shown.

[Birmingham wind and weather statistics — Windy.app](#)

Impact on receptors with prevailing wind

With the prevailing wind blowing from the North, northeast those receptors to the West, Southwest would be worse affected.

These are namely two small business parks approximately 300m – 500m from the site boundary, Duddeston train station approximately 500m, Freightliner terminal station 800m from the site boundary. with smoke inhalation being the main impact and smoke affecting visibility of the carriageway being the predominant impact from a fire.



2.2 Combustible Waste Streams

At any time, there may be the following types of combustible waste present at the site:

- Mixed paper and cardboard
- Paper
- Cardboard
- Plastic packaging
- General waste
- Wooden pallets

2.3 Other Combustible Materials

In addition to the above, the site also stores:

- Diesel (2300 Litres)
 - For mobile plant
- Ad Blue (2300 Litres)
 - For fleet vehicles
- Hydraulic oils (1000 Litres)
 - For mobile plant/ Plant equipment
- Lubricant Aerosols (250 litres)
 - For mobile plant/ plant equipment

Items are stored within self-bunded containers away from any flammable materials and ignition sources. The Diesel tank is also accessible to the fire brigade in the event of a fire. The tank is located by the site entrance away from flammable materials stored on site and is shown on the site plan.

Items including aerosols, lubricants and solvents are stored within a secured container in the production warehouse area, Items are only removed from there when required and are returned after use. Rags from the maintenance of equipment are also present and once used, are disposed of accordingly. Items that are contaminated through contact with flammable substances are to be segregated and disposed of separately.

There are no gas cylinders, LPG mobile plant or Persistent organic pollutants (POPs) stored on site.

Bunded Diesel Tank



Oil Storage

3 FIRE PREVENTION PLAN

This Fire Prevention Plan has been developed to include an assessment of fire risk on site and the measures in place to prevent, detect, suppress, mitigate and contain fires. This plan forms part of the business's Integrated Management System and sets out the fire prevention measures and procedures that will be put in place and used on site.

All staff and contractors working on site will understand the contents of the Fire Prevention Plan and what they must do during a fire.


The Fire Prevention Plan will be kept in the Site Office and all staff will be aware of its location. Regular exercises will be carried out to test how well the plan works and that staff understand what to do. These exercises will take place twice a year.

Site responders (Fire marshals) will feedback to the General Manager areas for improvement in such exercises.


In addition, there will be a copy of the Fire Prevention Plan stored in a box at the site entrance in the event that the Fire Brigade have to attend the site out of hours.

3.1 Control of Potential Causes of Fire

The following table identifies common causes of fire and the measures that Smurfit Westrock take to reduce the risk

Source of Fire	Applicability to Site and Proposed Management Controls	Residual Risk
<p>Arson</p>	<p>Arson by intruders is monitored via 24/7 CCTV, security gates and a secured perimeter (fencing and walls). CCTV is monitored by management staff when the site is unmanned on weekends or recognised bank holidays.</p> <p>The site is well lit and secured. Any fire would be immediately identified. The boundary and gate's primary purpose is to prevent unauthorised entrance to the site and are constructed from 4m high steel gates, turnstile pedestrian access, automatic barrier and 4m masonry wall. To the west perimeter, the wall has been reinforced with cladding to protect the perimeter wall. Pedestrian access to the site is granted from the south, whilst authorised personnel may enter from the east through automatic shutter doors using Radio frequency identification devices.</p> <p>Site CCTV monitoring point</p> 	<p>VERY LOW</p>
<p>Plant and equipment</p>	<p>The site has a regular inspection and maintenance programme, which identifies any electrical or mechanical machinery faults, which could result in a machinery fire.</p> <p>Mobile plant will always be parked a minimum of 6m from any waste pile. This limits the potential for fire spread from machinery to material. All machinery is visually inspected as</p>	<p>LOW</p>


	<p>per company requirement using specific documentation associated with the mobile plant equipment as well as F304 Site walkover observations Management checks. This can be found in Annex B–Site Procedures.</p> <p>Machinery is regularly cleaned to remove any dust, waste etc to ensure that it does not accumulate on moving parts.</p> <p>When not in use plant and equipment is not stored within 6m of waste and flammable items.</p>	
Electrical Faults Including Damaged or Exposed Electrical Cables	<p>The risk of damaged or exposed electrical cables is controlled via the regular inspection and maintenance programme.</p> <p>Any electrics on site are fully certified by a qualified electrician and a permit to work will be issued by engineering manager.</p>	LOW
Discarded Smoking Materials	<p>All staff and visitors to site are informed of the smoking policy during site induction and it is clearly signed on entrance to site.</p> <p>Any persons found smoking including the use of e-cigarettes in on site will receive a formal warning.</p> <p>Smoking is only allowed to take place off site and as such is not included in the site plans.</p>	VERY LOW

	<p>No smoking or discarded smoking items are allowed or stored within 6m of waste and flammable items.</p> 	
Hot Works (maintenance repair)	<p>Hot works can be defined as gas cutting, welding and grinding. When maintaining plant equipment, should hot works be required then a permit to work will be issued and the management will be made aware.</p> <p>Any works conducted will undergo close monitoring and adequate sign off, with a close observation of the works completed for up to one hour to ensure no delayed risk of fire has occurred and should not be completed any later than an hour before the site closes.</p> <p>Gas cannisters are not stored on site and are to be provided by contractors as to minimise the accumulation of fuel, this includes any equipment required to complete the works.</p> <p>Should hot works be undertaken by an external contractor, any flammable material in the area is to be removed from the area to no less than 6 metres and the area under a fire watch for the duration of the works.</p>	LOW

	<p>An active fire watch is to be put in place throughout the activity and fire fighting equipment such as extinguishers are to be placed within proximity to the works, consideration will be taken in this instance to ensure that areas are not left without adequate fire fighting equipment should equipment be moved.</p>	
Hot Cutting	N/A	N/A
Industrial Heaters	Not utilised on site	N/A
Hot Exhausts and plant	<p>The site has a regular inspection and maintenance programme which identifies any signs of a fire caused by dust settling on any hot exhausts and engine parts. This is carried via visual checks throughout the day via the F304 Site walkover observations Management checks as well as at the end of the working day. Machinery is regularly cleaned to remove any dust, waste etc to ensure that it does not accumulate on moving parts.</p> <p>When not in use plant and equipment is not stored within 6m of waste and flammable items.</p>	VERY LOW
Ignition Sources	<p>Ignition sources including welding equipment are stored well away from combustible wastes within the workshop.</p> <p>If hot works are required within the waste processing area a hot works permit must be issued via the sites management and an active fire watch must in place. Hot works must be completed 1 hour before the site closes and a fire watch put in place with extinguishing equipment.</p> <p>When hot works are being undertaken by a member of staff or a contractor firstly any waste is removed from the area to a distance of 6m. A fire watch is put in place throughout the activity and fire extinguishers are placed close to the activity to enable any fire to be quickly extinguished. Once the hot works have been completed the equipment is removed from the area and the fire watch stays in place for a further hour with the fire extinguishers still in the area.</p>	LOW

Spills and Leaks	<p>Any fuel stored on site is within a fully bunded tank to ensure any leaks and spillages are contained.</p> <p>Spill kits will be retained across the site for use in the event of any localised leaks or spillages around the fuel storage tank.</p> <p>Staff are made aware of location and use of the spill kit as well as the procedures to carry out in the event of a spillage</p> <p>All waste bays, containers and storage facilities used on site will be monitored on a regular basis to ensure no spillages of contaminated waste are taking place</p>	VERY LOW
Build-up of Loose Combustible Waste and Dust	<p>The site has a regular inspection and maintenance programme which will identify any build-up of wastes and dust. Machinery is regularly cleaned to remove any dust, waste etc to ensure that it does not accumulate on moving parts.</p> <p>The site is inspected regularly throughout the day with a final check undertaken half an hour after the end of each shift by supervisors in accordance with the sites inspection procedure F304 Site walkover observations Management checks.</p> <p>Any build-up of waste and dust would be identified during the inspection. If any dust, waste etc is identified then the area will be immediately cleaned (swept, /cleaned etc).</p> <p>All inspections are logged on F304 Site walkover observations Management checks</p> <p>All forms are stored in the site office.</p>	LOW
Reactions Between Wastes	<p>The site accepts the recognised recoverable fibre or material agreed in the customer agreement/ contract. As such provisions are in place to ensure compliance to the Integrated Management System. EMSP -08 <i>Waste management and duty of care</i> documents the arrangements and responsibilities of individuals and departments.</p>	VERY LOW

	Incompatible or unstable wastes will not be accepted on site and any rejection will be formally documented and the customer/ site will be contacted to implement measures to reduce recurrence.	
Hot Loads	<p>Smurfit Westrock do not receive hot loads.</p> <p>The sites stringent waste acceptance procedures should ensure the rejection and dampening down of any hot loads, or removal to the approved quarantine area to ensure no further environmental damage elsewhere.</p> <p>Nevertheless, in the unlikely event a hot load is accepted onsite it would be immediately moved outside of the building to prevent combustion and allow material to cool.</p>	VERY LOW
Fire General	<p>The site is inspected regularly, all production areas are visited before the end of the shift. Once the site watch has left, it is then monitored by CCTV and within the building and thermal detection cameras are situated outside the building directed at the baled storage areas.</p> <p>HS-13 <i>Fire Safety</i> documents the procedures and responsibilities of personnel and departments within the site. Managers and supervision are responsible for ensuring adequate firefighting equipment, training and other resources are available to reduce the occurrence of a fire.</p>	MEDIUM
Electrics	<p>Electrics on site are be fully certified by a qualified electrician, portable items are PAT tested once per year.</p> <p>All extension cables are to be unwound before use to prevent overheating.</p>	LOW

Chemicals and fluids	<p>All chemicals and fluids such as lubricating oils and greases are either stored within a sealed container along with aerosols and paints or on a bunded drip tray within the maintenance area.</p> <p>The area is free from ignition sources and is equipped with dry powder fire extinguishers.</p> 	LOW
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3.1.1 Fire Watch

Due to the potential from fire due to a number of activities on site, a fire watch is required during normal and unscheduled activities such as repairs via hot works. Table 3.1.1 shows the fire watch procedures for the whole site:

Table 3.1.1 Fire watch procedures for the site

Activity	Fire Watch Specifics	When fire watch required
Use of mobile plant creating hot exhausts	<p>Appointed person to monitor the activity.</p> <p>Appointed person to know the location of closest fire extinguisher.</p> <p>Mobile plant is fitted with fire suppression systems.</p>	During operational periods and after use for 30 minutes.

Hot works (Permit to work)	Appointed person to monitor the activity and have fire extinguisher to hand. The Fire watch cannot be the person carrying out the activity.	During the hot works and after use for 1 hour
Waste Treatment	Appointed person to monitor the activity. Appointed person to know the location of closest fire extinguisher	During periods of waste treatment and for one hour after
Non-operational hours	Thermal imaging cameras are situated on the exterior of the building covering the material stored to the east of the premises. Use of CCTV to actively monitor the site overall, both inside and outside of the building.	All non-operational periods

3.1.2 Hot Weather

During hot weather waste can heat up; however, the site is able to mitigate this in the following ways

- Waste is always stored in its largest form.
- Any potential build-up of heat within the waste can be released by always treating the waste that has been on site longest first (first in first out policy)
- Always minimising storage times to as a short a period as possible
- Ensuring there are no reflective surfaces reflecting light onto the waste piles
- The production area is situated externally, whilst the baling equipment is situated under canopies.

3.2 Preventing combustion

3.2.1 Managing Storage Time

Smurfit Westrock operate in such a manner as to maintain waste piles as low in size as possible. All combustible wastes are processed and removed from site within 3 months in line with the EA FPP Guidance.

All waste entering the site reports to the weighbridge and the site office. At this point the waste is booked into the site, as a result all storage volumes and times can be monitored.

Site Management and commercial staff to track all waste flow through the site to ensure that the storage times specified in this plan are adhered to.

Site weighbridge and office



A daily review of the stockpiles and conditions are made by the Site Manager or their deputies in accordance with [F304 Site walkover observations Management checks](#)

Smurfit Westrock track all material flows through the site to ensure that the storage times specified in this plan are adhered to. All material received is traceable up until point of processing, in which it becomes product. Different grades of product is produced and stored until collection is arranged, the rotation of material is achieved through a 'first in–first out' basis. Seasonal variations in materials are monitored by the site using the sites tracking system and tonnages. Should the site near capacity for a particular waste stream, acceptance of this waste type will cease until stock rotation can resume.

Good stock rotation is a key component of Smurfit Westrock activities. In the event that material requires storage for longer than 3 months, stock piles are rotated on a monthly basis and temperatures monitored using handheld thermal devices. These devices are calibrated annually.

Storage times of processed material is kept to a minimum with material stored in its unprocessed form for as long as possible prior to processing and export offsite. Please see Table 3.3.1 below for storage time's onsite broken down by individual waste stream.

At any point there are no ignition sources stored or allowed within 6m of any waste piles unless for operational reasons, this includes –

- Smoking
- Hot exhausts
- Hot works

3.2.1a Waste Form

Materials will be stored in its largest form when it arrives at site and does not pass through any size reduction processes other than processing through baling equipment. Where possible material streams are separated into different fractions for recovery.

3.2.2 Monitor and Control Temperature

Temperatures of the materials will be controlled through several measures including:

- Storage of wastes in unprocessed state.
- Routinely turning stockpiles to aid detection of hotspots and moisture levels.
- A trained site operative will carry out a visual inspection on site daily in accordance with procedure [F304 Site walkover observations Management checks](#) & to ensure that the site is being managed correctly.

All storage areas and piles will undergo where possible a full 360° inspection to cover any blind spots and hard to observe locations where possible.

The temperature of the waste piles will be monitored using a handheld monitor once per shift in accordance with Procedure [F304 Site walkover observations Management checks](#).

Temperature readings for each pile will be recorded in [F304 Site walkover observations Management checks](#) Should the temperature be recorded at 50°C or above, the Manager will be immediately notified, and the waste will be dampened in situ using the onsite hoses prior to removal to the quarantine area for cooling.

Material will be transported by use of available mobile plant, which is capable of transporting waste to the quarantine area without endangering staff personnel. If hotspots are detected using the thermal imaging camera and the waste has been removed to the quarantine area for cooling, the thermal imaging camera will be used to ensure that that un-baled waste is appropriately cooled before leaving the quarantine area.

All staff will undergo specific fire response training including the use of operational handling machines, hoses, thermal imaging cameras. This training will be site specific and provided to all site staff. This training will be provided by a suitably qualified fire-fighting professional and refresher training will be undertaken annually through internal refresher training, toolbox talks and external

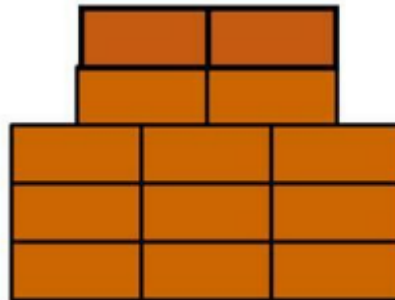
training for firefighting equipment training and marshalling will be refreshed every 3 years. Additionally, there are two thermal detection cameras monitoring the exterior of the building.

If heat is detected within these two areas, staff and management will visually be notified through the CCTV surveillance within the main office area and Production Manager's office. More detail on this can be found in Section 3.5 Detecting fires. Furthermore, the entire site is manned for at least 11 – 12 hours a day when site personnel are on site.

3.3 Management of Waste Piles

3.3.1 Maximum Pile Sizes The table below provides an overview of the waste types, volumes, storage times and maximum waste quantities of the key combustible wastes accepted at the site.

The maximum height of any stored waste is 4.5m when stacking none Bollegraaf spec bales in formation L of Smurfit Westrock's Bale storage and inspection standard.



All flammable waste is stored a minimum of 6m away from any other flammable waste or materials and sources of ignition when not contained/ within bays.

Waste Type	Max. Storage Time	Max. Storage Volume	Form	Storage Method	Max. Height/Container
Mixed paper and cardboard loose	1 day	50m ³	Loose	Mill Adjacent to baling equipment conveyor	2m
Loose cardboard					
Loose paper					
Baled plastic packaging	90 days	100m ³	Baled	External free standing stack	2m
Baled paper/ Card (Top of yard)	30 days	700m ³	Baled		4m
Baled paper/ Card (Top left of yard)		600m ³			
Baled paper/ Card (bottom left of yard)		600m ³			

Waste will be stored in its largest form when it arrives at the site. Once it has been processed the product is only held on site for the minimum amount of time required.

3.3.1 Waste tracking

The company keeps records of materials entering and leaving site. Weighbridge tickets/ collection notes are held on file in the site office.

The material that has been stored on site for longest period of time is first processed. This minimises the length of time on the site and reduce the potential for degradation.

3.4 Prevent Fire Spreading

3.4.1 Separation Distances

All material is separated by a fire break of at least 6 metres and no material stack is any more than 750tonnes.

All plant machinery will be parked a minimum of 6m away from any combustible waste and are fitted with fire suppression systems.

3.4.2 Fire Walls and Bays

All material is either stored within waste piles with 6m gaps or separated by concrete block firewalls. The concrete block firewalls will be sealed and have a fire resistance period of at least 120 minutes to allow the waste to be isolated.

All concrete blocks utilised in the walls are Class A1 fire resistant in accordance with Clause 4.3.4.4 of BS-EN 13369– ‘Common Rules for precast concrete products’.

Waste within the bays will always be stored to allow a ‘freeboard’ space of at least 1m at the top of the bay. This will remain clear at all times to prevent the potential spread of fire over the top of the walls.

The site will operate a ‘first in first out’ policy and regularly carry out full stock rotation. Regular site inspections ensure that freeboard space is maintained and piles are managed correctly.

The blocks have also been provided with additional supports for both the wall integrity and staffs safety.

3.4.3 Building Construction and boundary

The transfer building has external walls constructed from concrete from the ground to a height of 4m with the roof structure being of steel cladding.

The site itself is secured with a 4m masonry wall and surrounding two storey building and gates of the same height and this surrounds the entire site perimeter.

Loading / unloading



Material received or transported in it's largest form.

3.4.4 Quarantine Area

The sites quarantine area will be vacant at all times. The location of the quarantine area can be found on the Site Layout Plan. *(Example of area being used as quarantined bay showing 300m³)*



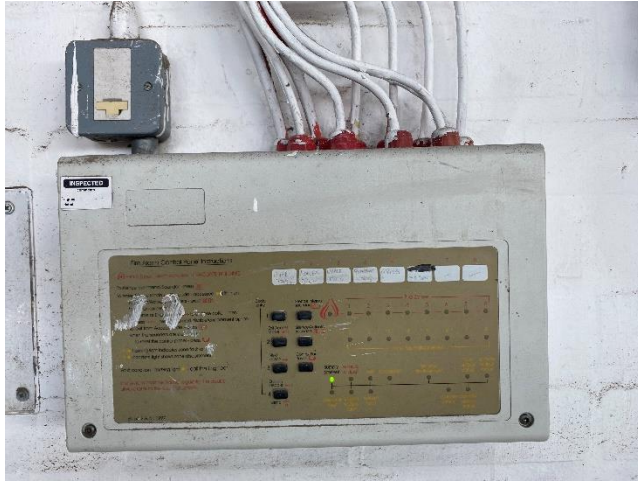
The largest loose material pile on site is 50m³, the largest storage of baled material will be 700m³ therefore, the size of the quarantine area is within the FPP requirements of storing at least 50% of the largest waste pile on site. Waste will be removed to the quarantine area using the available mobile plant, this is a safe way of transporting hot waste to the quarantine area without endangering staff personnel.

The quarantine area has a separation distance of 6m all the way around it from waste storage, treatment and ignition sources. The quarantine area is 6m from any flammable waste or other flammable items or sources of ignition.

3.5 Detecting Fires using thermal imaging camera's

The site has CCTV cameras situated across the site, facing the storage yard in which predominantly the material is house to the North of the site.

In addition to the detection system the system is provided with a full fire alarm system including control panel and alarm points. The system can be added to if required and as within any other items relating to fire safety is tested on a weekly basis and the test is recorded within the sites Fire Safety Book.



3.6 Suppressing Fires

The site will rely upon active firefighting techniques.

In the event of a flame being detected by the flame detectors or staff the Fire Brigade will be contacted immediately via 999. The site will also follow firefighting procedures within section 3.7.

The Environment Agency Fire Prevention Plan Guidance, section 16 - water supply states -

You'll need a water supply of at least 2,000 litres a minute for a minimum of 3 hours for a 300 cubic metre pile of combustible material.

$$2000L \text{ (Per minute)} \times 180\text{minutes (3 hours)} = 360,000L$$

Based on the above –

700m³ requires – 828,000 litres over 3 hours

600m³ requires – 720,000 litres over 3 hours

500m³ requires – 597,000 litres over 3 hours

400m³ requires – 478,000 litres over 3 hours

300m³ requires – 360,000 litres over 3 hours

The site water containment survey has identified that the site can hold >1.13 million litres of water.

Deducting the footprint of material stored within the area, that reduces the containment to >940,000 litres (*within the marked areas of the plan*) The site boundary has a concrete upstand encompassing the material storage area at a height of 1.2m.

The site sprinkler system is connected to an on-site silo water supply that pumps the supply to the sprinkler system and is serviced annually. The tank is 8.4m diameter and 4.5m high.

Tank Volume & Fill Calculator

Tank Type: Vertical Cylinder ▼

enter tank inside dimensions
using integers, decimals or fractions

Height (h) = 4.5 m ▼

Diameter (d) = 8.4 m ▼

Filled Depth (f) = 4 m ▼

Tank Volumes

<i>88.9% Full</i>	Total Capacity	Filled Volume*
U.S. Gallons	65,879.13	58,559.22
Imp. Gallons	54,855.85	48,760.75
Liters	249,379.62	221,670.78
Cubic Meters	249.3796	221.6708
Cubic Feet	8,806.7583	7,828.2296



3.7 Fire Fighting Techniques

The site has been designed to allow active firefighting if and this applies to both inside the building and outside areas.

In the event of a fire, the fire brigade will attend the site and gain access via the main gates. Water would be drawn from the offsite fire hydrant. The sites staff will have closed the sites drainage system via clay mats if the fire was during operational hours. When the site is closed staff will attend site, the Fire Brigade will also know where these clay mats are stored.

In addition there is a canal adjacent to the site where fire water could be drawn from.

Upon firefighting commencing any firewater runoff will be contained within the sites drainage system. Tankers will be called to remove firewater from the sites drainage system and transfer it to a suitable permitted transfer station.

Upon identifying or being made aware of a fire, the manager will raise the alarm, alert all present on site to the fire and its location and alert emergency services. All emergency contacts to be setup for the WMP folder and site

Staff will only tackle the fire using the fire extinguishers and onsite hose points if:

It is safe to do so;

- The fire service has been notified;
- The Environment Agency will be notified;
- The fire is small and not spreading to other areas;
- The sites drainage has been sealed off.
- Escaping the area is possible by backing up to the nearest exit; and
- The fire extinguisher is in working condition and personnel are trained to use it.

In the event of a small fire:

- Staff will remove burning material using the sites mobile plant to the quarantine area.
- Trained staff will then use on site hoses and extinguishers to extinguish the fire.

In the event of a larger fire, staff are to await the Fire and Rescue Service (FRS), who would then take the appropriate actions. All personnel working on site will be provided training in the Fire Prevention Plan and all associated procedures and controls. EA training record shall be maintained onsite.

The FPP training will be provided to all new starters and temporary employees working at the site. FPP refresher training will be carried out to all personnel at least annually.

Current Firefighting Installation example



3.9 Maintenance and Inspection

All hand held fire extinguishers will be annually inspected as per industry guidelines and inspections dates will be written on the extinguishers. Extinguishers will also feature a tag showing the extinguisher has not been used. If removed or the extinguisher is discharged they will be inspected again and a new tag added.

On a monthly basis all fire exists, extinguishers and emergency lighting will be checked and in the case of lighting tested. Records of the inspections and tests will be made in the sites fire log book and conducted by the fire marshal.

The fire alarm will be tested at the same allotted time each week and again this will be conducted by the fire marshal and recorded in the fire log book.

3.10 Fire Evacuation

Fire evacuation points are located at the site entrance and are clearly sign posted.

Sites rules are reinforced via use of fire drills and planned response scenarios.

All personnel are to follow the instructions of the Fire Wardens and the Manager. A list of trained Fire Wardens is maintained and displayed on the site, together with a list of on call staff to attend the site in the event of a fire outside of normal operation hours.

The Fire Evacuation Procedure is provided to staff, contractors and visitors which states

On discovery of a fire, immediately operate the fire alarm by pressing the nearest break glass call point and / or contact the Site Manager via a radio to ensure the alarm is

Fire Wardens and staff must only tackle to fire if they are trained to do so, the equipment is appropriate and if their safety or that of others is not compromised.

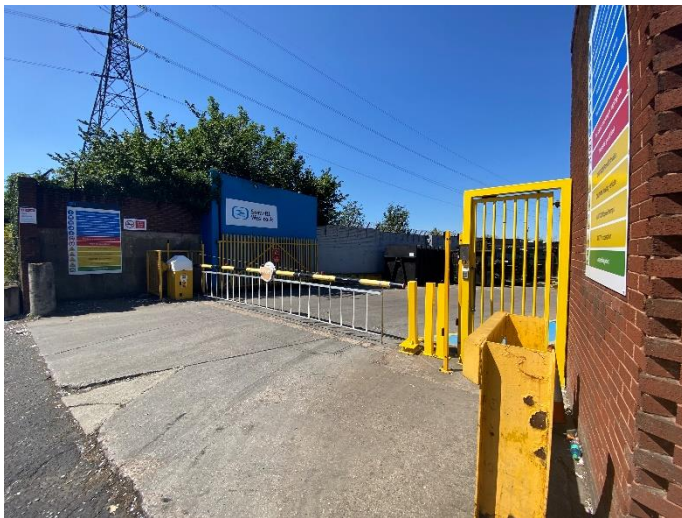
Leave the building / work area by the nearest available exit / safe route and report directly to the assembly point located at the staff parking area.

Leave quickly but in a calm, controlled and orderly manner. Do not detour to collect personal items;

Do not re-enter the building / work area for any reason until authorisation has been given by the Manager / Fire Brigade.

The Manager will assess the situation and call the Fire and rescue Service if required.

Site entrance



3.10 Drills and testing

The site will conduct evacuation drill every six months to ensure all staff know how to safely leave the building and locate the muster point.

All checks and tests are to be recorded in the sites fire log book.

3.11 Water Supplies

A fire hydrant is present outside of the site, on the junction of Duddeston mill road and along Adderley road which can be accessed by the emergency services. Fire brigade also have the access and ability to retrieve water from local canal.

3.10 Managing Fire Water



All operational areas of the site are situated on an impermeable concrete pad, which either drains to the surface or foul sewer. In the event of a fire or external on an impermeable concrete pad, all drains will be closed with the use of clay mats.

All firewater would be contained within the baler pits or onsite interceptor as shown in the sites drainage plan.

In the event of a fire, the fire brigade will attend the site and gain access via the main gates. Water would be drawn from the local fire hydrants. The sites staff will have closed the sites drainage using penstock valve or drain mats to prevent contamination.

Upon firefighting commencing any firewater runoff will be contained within the sites drainage system. Tankers will be called to remove firewater from the sites drainage system and transfer it to a suitable permitted transfer station.

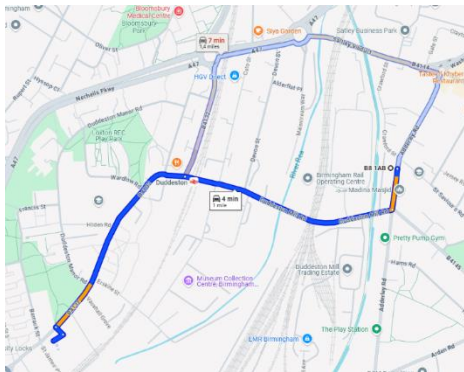
It must be noted that due to the control measures in place onsite to detect and suppress fires in their early stages, it is highly unlikely that the volumes of firewater will ever reach those calculated in accordance with the current Fire Prevention Plan Guidance.

The site is located within 50m to the Grand union canal. The sites surface water drain to a the public sewage system. However, any failure to control firewater runoff would result in the potential pollution to the adjacent canal.

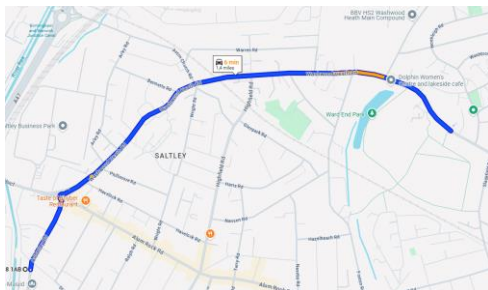
3.11 Attendance by the Fire Service

The site will request regular attendance by the Fire Brigade for site familiarisation visits and the Fire Prevention Plan will be shared with them.

The site is fortunate to be located close to two fire stations –



West Midlands Fire Service Headquarters, 99 Vauxhall Rd, Birmingham B7 4HW, a distance of 1 – 1.4 miles and a travel time of 5 minutes.



And Ward end fire station, Washwood Heath Rd, Ward End, Birmingham B8 2HF.

A distance of 1.4 miles and a travel time of 5 - 6 minutes.

In the event of attendance access to site can be achieved by the South entrance and East shutter door access routes. Both the front and rear of the building as well as the site yard can be achieved via a fire engine as shown on the site Fire Arrangements Plan.

3.12 During and After an Incident

During

All drainage will be covered using drain mats.

During any fire-fighting or subsequent clear up operations, any incoming material will be diverted to an alternative Smurfit Westrock Recovered Fiber processing site.

The Environment Agency will be informed in the event of a fire,

Environment incident hotline

Telephone (24-hour service) 0800 80 70 60

After

Any material that is beyond processing due to fire damage will be disposed at an appropriate facility.

It is anticipated that the clearing of burnt material will not take long, as the company are confident that

any fires will be appropriately controlled and therefore will not result in significant volumes of burnt waste.

All firewater captured within the site boundary will have been removed by tanker. Fire water will be contained so far as reasonably practicable within the confines of the material storage areas. The Environment Agency will be informed of any fire water that escapes site or enters the watercourse system. The site will be cleansed and then once the effected material has been cleared off site, site operation can return to normal.

Fire Prevention Plan Review

This document is reviewed and updated annually, in addition to any operational changes to the site, in the event of a fire of any size or severity, if requested by the Environment Agency or if the Fire Prevention Plan Guidance changes.