FIRE PREVENTION PLAN

Percival Street Mill, Percival Street, Blackburn, BB1 6NH

Ellen Shirley Limited

Version:	1.1	**Date:**	01 August 2023		
Doc. Ref:	3306-001-A	**Author(s):**	CP	**Checked:**	RS
Client No:	3306	**Job No:**	001		

Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants

Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | Fax: 01606 861183 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk
REGISTERED IN THE UK | COMPANY NO. 4850754

Document History:

Version	Issue date	Author	Checked	Description
1.0	12/07/2023	JH	-	Internal draft
1.1	01/08/2023	CP/JH	RS	Application variation copy

THIS DOCUMENT IS DUE FOR REVIEW IN **July 2025** OR AS A RESULT OF ANY INCIDENTS WHICH MAY LEAD TO THE REQUIREMENT FOR IMMEDIATE REVIEW, WHICHEVER IS THE SOONER

CONTENTS

List of Appendices:

Appendix I - Drawings

Drawing No. 3306/001/03 – Site Layout & Fire Plan

Drawing No. 3306/001/04 – Sensitive Receptors Plan

Appendix II - Record Keeping Forms

Fire Check Inspection Form

Preventative Maintenance Checklist

Employee Training Needs Assessment / Review

(**Forms used as a guide; operator may use internal forms based on the information provided)**

List of Tables

Site Information & Key Contacts List

Site Address:	Percival Street Mill, Percival Street, Blackburn, BB1 6NH		
Site Operator:	Ellen Shirley Limited	**National Grid Ref:**	SD 68829 28973

CONTACT	DESCRIPTION	OFFICE HOURS	OUT OF HOURS
Asif Issa **Noormohamed Valli**	Directors	01254 52266	07590 402863 07968 940770
Asif Issa	Technically Competent Manager	01254 52266	07590 402863
Royal Blackburn Hospital Haslingden Road, Blackburn BB2 3HH	Local NHS Hospital (Main)	01254 263555	999
	Accident & Emergency (A&E)	999	999
Little Harwood Health Centre Plane Tree Road, Blackburn BB1 6PH	Local Doctor Surgery (GP)	01254 915005	999 or 112
Lancashire Police Blackburn (Town Centre) Police Station St Johns Court, Ainsworth Street, Blackburn BB1 6AR	Local Police Non-Emergency	01865 841148	999 or 112
	Police Emergency	999 or 112	999 or 112
Lancashire Fire & Rescue Service Blackburn Fire Station Byrom Street, Blackburn BB2 2LE	Fire and Rescue Service (in Emergency Dial 999)	01254 52111	999 or 112
Environment Agency Lutra House, Dodd Way Off Seedle Road, Walton Summit Centre, Bamber Bridge, Preston PR5 8BX	Environmental Regulator	03708 506506	0800 80 70 60
Blackburn With Darwen Borough Council Town Hall, Croft Street, Darwen BB3 1BQ	Local Council General Enquiries	01254 585585	999 or 112
United Utilities Mere Business Park, Lingley Green Avenue, Great Sankey, Lingley WA5 3LP	Mains Water Supplier	0345 672 3723	0345 672 3723
Oaktree Environmental Ltd Lime House, 2 Road Two, Winsford, Cheshire CW7 3QZ	Secondary specialist waste and permitting compliance advisors	01606 558833	07590 402863 07968 940770

1 Introduction

1.1 Overview of site operations

1.1.1 This document considers the risks associated with a fire at Percival Street Mill, Percival Street, Blackburn, BB1 6NH. The following operations which will take place at the site and are relevant for this Fire Prevention Plan (FPP) are as follows:

- Household, commercial & industrial waste transfer station with treatment;

1.2 Fire prevention objectives

1.2.1 This FPP has been designed to meet the following objectives:

- To minimise the likelihood of a fire happening;
- To aim for a fire to be extinguished within 4 hours;
- To minimise the spread of a fire within the site and to surrounding neighbouring sites; and,
- To minimise impact of fire on people, environment and businesses.

1.2.2 This FPP document will be kept in the site office and in other locations around the site to ensure all operational site staff and contractors are aware and understand the contents of FPP and what they must do during a fire.

1.3 Summary of site operations

1.3.1 In summary the main operations which take place at the site are as follows:

- Compacting (by loading shovel/telehandler)
- Sorting (by hand or with loading shovel/ telehandler)
- Separation (by hand or with loading shovel/ telehandler)

1.3.2 The above activities are clearly shown on the Site Layout & Fire Plan which is referenced as Drawing No. 3306/001/03 and shown in Appendix I of this FPP.

1.4 Hours of operation

1.4.1 The site will be open during the following hours for the delivery, receipt and processing of waste:

Monday to Friday	08.00 – 16.00
Saturday	No operations
Sundays, Bank/Public holidays	No operations

Note: The only activities on site which will be permitted outside of these hours are onsite maintenance works, emergency deliveries of waste/plant/machinery and general office use.

1.5 Staffing and Management

1.5.1 The site will open for the deposit of waste or for other essential operations during the hours listed in Section 1.4. The table below details the staff structure of the site when operating at full capacity. Positions in bold italic print below are the minimum staff requirements when the site is open for the reception of waste:

Table 1.1 - Staffing Levels

Position	Employees	Responsibilities
Site manager/s	1 ***(1)***	Overseeing and co-ordinating all activities which take place at the site
TCM (weekly)	1 ***(1)***	Ensuring that the site is being operated in accordance with Health & Safety Legislation
The above comprise site management who operatives will report to		
Machine / Plant Operator's /	2 ***(1)***	Waste handling/processing, reception and plant operation
General operatives	2 ***(1)***	To conduct site patrols when the site is not manned / operational
Administration staff	***0(1)***	Office/administrative duties

1.6 Plant and Equipment

1.6.1 The table below details the plant/equipment on site which may present a fire risk and listed as a potential ignition source. Only trained operators will be permitted to drive/operate the plant/equipment listed below.

Table 1.2 - Item of plant, number and function

Item	Number	Function
18 tonne skip loader	1	Collection/deposit of skips
Forklift Truck	1	Loading/unloading/movement/sorting
Telehandler	1	Loading/unloading/movement/sorting
Weighbridge	1	Accurately weighing of loads

1.6.2 Note: The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.

1.6.3 The additional table below details the plant available to aid in fire suppression or manoeuvring of waste to reduce the spread of fire.

Table 1.3 - Item of plant, number and function (for fire-fighting purposes)

Item	Number	Function
Forklift Truck	1	Loading/unloading/movement/sorting
Telehandler	1	Loading/unloading/movement/sorting

1.6.4 Maintenance of all site plant is described in Section 2.5 of this FPP.

1.7 Correspondence with Fire and Rescue Service

1.7.1 Ellen Shirley Limited will seek a two-yearly response from the EA and FRS (or sooner should a fire incident occur) with regards to their FPP and associated operations on site. This regular correspondence will ensure all measures to prevent, mitigate and contain fires on site are up to date and deemed sufficient by the FRS.

1.7.2 The FRS were contacted during the preparation to obtain information relating to the nearest fire hydrants to the site. This information is shown on Drawing No. 3306/001/03 and in Section 10.3 of this document.

1.8 Sensitive Receptors

1.8.1 A Sensitive Receptors Plan has been provided in Appendix I to highlight all main receptors within 1,000m of the site which could be affected by a fire at the site. To minimise the impact on the local area and associated receptors from a fire on site, this document details mitigation measures which will decrease the likelihood of a fire occurring on site and limit the size and duration of a fire if it does occur (as per Section 1.2 above). These measures will ensure the potential impact on any of the surrounding land is as minimal as practicably possible.

1.8.2 Contact details for surrounding industrial, commercial, retail and leisure premises are shown in Section 8.3 including and procedures of how receptors with human population would be notified of a fire.

1.8.3 The table overleaf details a risk assessment of all the receptor types within 1km radius of site, and likely impacts on each - e.g. smoke, road closures, impacts on businesses etc…

Table 1.4 – Sensitive receptors table

Receptor	Receptor Type	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management
Numerous surrounding industrial and commercial uses	Industrial / commercial premises	Fire causing the release of polluting materials to air (smoke, fumes and particulate matter)	Respiratory irritation, illness and nuisance to local population. Financial loss of businesses due to closure of adjacent roads/evacuation of premises.	Air transport of smoke.	High	Medium	Medium	Procedures set out in this FPP. Toolbox talks and liaison meetings with receptors to review procedures in the event the site is subject of a fire.
Residential dwellings in the surrounding area	Residential	As above	Respiratory irritation, illness and nuisance to local population.	Air transport of smoke.	High	Medium	Medium	As above
Surrounding highway networks	Major road networks	As above	Closure of roads due to excessive smoke fumes. Increased risk of accidents due to poor visibility.	Air transport of smoke.	Medium	Medium	Medium	As above
Nearby leisure / retail	Leisure / retail	As above	Respiratory irritation, illness and nuisance to local population. Financial loss of businesses due to closure of adjacent roads/evacuation of premises.	Air transport of smoke.	Medium	Medium	Low	Procedures set out in this FPP. Toolbox talks and liaison meetings with receptors to review procedures in the event the site is subject of a fire.
Surface Waters including River Blakewater running beneath the site	Surface Waters	Direct run off of fire water across site or to surface waters. Fire causing the release of polluting materials to air (smoke, fumes and particulate matter).	Loss of amenity, deterioration of water quality, killing of flora / fauna and other local wildlife	Air transport of smoke. Direct run off of fire water across site to surface waters.	Med	Medium	Low	Procedures set out in this FPP. The site has a sealed drainage system.
Habitats and species including Deciduous Woodlands	Protected sites and species	As above	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Air transport of smoke.	Med	Medium	Low	Procedures set out in this FPP

2 Managing Common Causes of Fire

2.1 Details

2.1.1 The following table outlines common causes of fire and outlines specific examples of these sources, the associated risks and any mitigation measures necessary to manage them:

Table 2.1 - Common fire sources and mitigation

Source	Risk	Magnitude of Risk / Likelihood	Brief outline of Mitigation (refer to Section 4 for storage/monitoring procedures)	Magnitude of risk / likelihood following mitigation
Arson or vandalism	Deliberate ignition of wastes by intruder(s) and/or vandalism of site infrastructure, plant and/or machinery which may give rise to malfunction or compromise the integrity of waste storage/containment measures	Medium	• Suitable site security infrastructure. • Vehicle checks on arrival to the site. • Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. • Staff training / toolbox talks.	Near-zero
Plant or equipment	Spillages of fuel, sparks from machinery or malfunction caused by ineffective maintenance	Medium	• Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. • No fuel to be stored at the site. • Daily checks of site surfacing and spill kits. • Staff training / toolbox talks.	Near zero
Electrical appliances and cabling	Faulty appliances or damaged/ exposed electrical cables may spark as a result of a power surge	Medium	• Fixed wiring testing is carried out 5 years and portable appliances are PAT tested 12 months in accordance with Legislation. • Daily checks for dust and fluff on wiring / electrical appliances.	Low
Discarded smoking materials	Risk of ignition of stored wastes from smoking materials which have not been fully distinguished	Low	• No smoking on site	Near-zero
Sparks from loading buckets/shovels	Scraping of loading buckets/shovels causing sparks which may ignite stored wastes	Low	• Fire extinguishers are fitted in the cab of all loading plant. • Staff training / toolbox talks. • Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer.	Low
Hot works	e.g. welding, soldering, cutting, etc. which involve the use of high temperature equipment which may be a source of both primary and residual heat to stored wastes	Medium	• No hot works will take place on site	Low
Industrial heating	Industrial heaters and/or pipework used to heat internal and external areas on site which may, in turn, supply heat to stored wastes increasing the risk of combustion	Low	• There are no industrial heaters (or associated pipework) used heat areas of the site.	Low
Hot exhausts	Potential source of both primary and residual heat to stored wastes	High	• Fire extinguishers are fitted in the cab of all mobile plant. • Staff training / toolbox talks for continuous monitoring throughout the day to detect signs of a fire caused by dust settling on hot exhausts and engine parts. • Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. • Out-of-hours storage of plant & equipment away from combustible or flammable wastes. • Daily checks for dust and fluff on plant/equipment before and use of equipment.	Low

Source	Risk	Magnitude of Risk / Likelihood	Brief outline of Mitigation (refer to Section 4 for storage/monitoring procedures)	Magnitude of risk / likelihood following mitigation
Build-up of loose combustible waste, dust and fluff	Light waste and ambient particulates with high combustibility settling and building up in key areas in and around plant/machinery and around exhausts	High	• Fire extinguishers are fitted in the cab of all loading plant. • Staff training / toolbox talks for continuous monitoring throughout the day to detect signs of a fire caused by dust settling on hot exhausts and engine parts. • Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. • Minimum daily checks for dust and fluff on plant/equipment before and use of equipment at the start/end of each working day.	Low
Hot loads	Imported wastes which may contain materials which are above ambient temperature	High	• All loads are inspected in accordance with strict waste acceptance procedures. • Quarantine area and rejected waste containers on site for quick isolation of load.	Low
Overhead power lines	Any overhead power lines on or around the site may ignite in the event of a fire and worsen the effects	Low	• There are no overhead power lines which traverse the site.	Near-zero
Ignition sources	Activities or appliances which use a source of both primary and residual heat to treat waste or manufacturer material or plant/equipment	Medium	• No hot works will take place at the site. • Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. • Minimum daily checks for dust and fluff on plant/equipment before and use of equipment at the start/end of each working day. • Out-of-hours storage of plant & equipment away from combustible or flammable wastes • No idling policy in place	Low
Other combustible non-waste materials on or near the site not mentioned above i.e. gas cylinders / LPG tanks	Any combustible non-waste materials on or near the site may ignite in the event of a fire and worsen the effects	High	• All loads are inspected in accordance with strict waste acceptance procedures. • Quarantine area and rejected waste containers on site for quick isolation of load. • Dedicated storage areas for cylinders and LPG tanks on site.	Low
Reaction between wastes	Combustible waste piles may ignite in the event of a fire and worsen the effects if wastes react	High	• All loads are inspected in accordance with strict waste acceptance procedures. • Quarantine area and rejected waste containers on site for quick isolation of load.	Low
Leaks and spillages of oils and fuels	Fuels and combustible liquids leaking or trailing from site vehicles and ELVs can combust or cause accidents leading to combustion	High	• Spill kits available throughout the site. • Suitable and sealed drainage system. • No oils/fuels stored at the site. • Continuous (minimum twice daily) checks for spillages around the site. • Staff training / toolbox talks. • Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer.	Low
“Tramp” metal	Metal could be hot from mechanical processing and interact with lighter waste causing a fire	High	• All loads are inspected in accordance with strict waste acceptance procedures. • Quarantine area and rejected waste containers on site for quick isolation of load containing batteries. • Minimum daily checks on mechanically processed scrap metal at the start/end of each working day. • Staff training / toolbox talks for continuous monitoring throughout the day to detect signs of a fire caused by dust settling on hot exhausts and engine parts. • No mechanical treatment of scrap metal expected to take place at the site.	Low

2.2 Fuel & Hazardous Fluids Storage

2.2.1 The site will not store any fuel or any other hazarouds fluids, substances or matrerials at the site. If any are discovered in a load of waste received, they will be quarantined and removed from the site within 48 hours.

2.3 Hot Works Procedure

2.3.1 No hot works will take place at the site.

2.4 Smoking Policy

2.4.1 No smoking will take place on site.

2.5 Mobile and fixed plant maintenance

2.5.1 All mobile and fixed plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.

2.5.2 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day using a checklist similar to that in Appendix II to ensure the following:

- Machinery is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
- Mobile plant is stored in the out-of-hours plant storage area as shown on Drawing No 3306/001/03 following cessation of activities and external separation distances of 6m are observed between plant and any combustible or flammable material.
- No plant will be stored in the building out-of-hours
- Plant which is not in use for any extended period is stored at least 6 metres from combustible waste in the dedicated area on site.
- All plant and equipment vehicles are fitted with fire extinguishers in the cab. Rubber strips are not considered appropriate as they are usually removed via uneven and bumpy ground.

- Dust from processing/treatment operations on site can settle throughout the working day onto processing plant, plant exhausts and engine parts so a fire-watch will be implemented after cessation of works and equipment powered down for 1 hour each day to remove any dust/fluff using brushes, hoses etc... Any build of dust/fluff will be removed from the equipment and deposited into a container to await removal from site and site management informed.

2.6 Site Security

2.6.1 The site security infrastructure is clearly shown on Drawing No 3306/001/03 and considered suitable to prevent trespassers. The site consists of 3.20m high solid brick wall to the North-West of the site, a 4.20m high solid brick wall to the East and a 5.20m solid brick wall to the North & South of the site.

2.6.2 The main site access will benefit from a lockable gate with the only access via a unique code.

2.6.3 In addition to the above, the site will also benefit from 24/7 remotely accessible HIK vision CCTV fitted with full on and off-site coverage. The CCTV only monitors for intruders and it is considered this is suitable given the low quantities, storage and duration of additional combustible waste types. Although the CCTV or monitoring is not UKAS accredited, it has been installed by a suitably qualified electrician and tested annually via a service contract to ensure it is suitable.

2.6.4 All CCTV cameras link to site management's mobile phones and an incident will directly inform the operator with a text or ring alert so the operator can review the footage on the phone and decide whether action is required i.e. attend the site or contact FRS/EA.

2.6.5 Any unusual or suspicious activity picked up which is not in line with site specific procedures will mean a call to the emergency services which would present the risk of arson.

2.6.6 The site security measures (fencing/gates) will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired to the same or better standard within 7 working days. All repairs will be noted on the site diary within 24 hours of the event.

2.6.7 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.7 Electrical Faults or Damaged/Exposed Electrical Cables

2.7.1 All fixed wiring electrical cabling on site will be inspected daily by staff and serviced in accordance with Legislation (3/5 years) by fully qualified and certified electrical contractors to undertake both Planned Preventative Maintenance and Reactive Maintenance (under contract) of the following:

a) Fire detection & alarm system;
b) Emergency lighting;
c) Machinery checks / services (as per manufacturers' instructions).

2.7.2 In terms of portable appliance testing (PAT), this will be serviced annually by qualified and certified electrical contractors.

2.7.3 Daily inspections of cabling, etc. will be undertaken and the daily Fire Checklist can be used as a reference. Any potential ignition sources from suspected electrical faults will be isolated and the appointed electrical contractors will be contacted immediately to rectify the situation. Where possible, staff will immediately remove any stored wastes from the vicinity of the fault area or cable traverse if safe to do so.

3 Waste acceptance procedures

3.1 General

3.1.1 Strict waste acceptance procedures are in place at the site and are summarised below. The waste is delivered to the site from the north-east and upon arrival all waste will undergo a visual inspection on arrival at site prior to progressing through to the weighbridge. Once the vehicle has passed the initial inspection, the vehicle will be directed to the weighbridge where the waste consignment notes (including hazardous) and transfer documentation will be fully checked to ensure the waste matches the pre-acceptance information received.

3.1.2 All waste tipped is spread on the floor so any non-conforming material processing i.e. pressurised vessels, hot loads, batteries (if any discovered) can be picked out and immediately quarantined as detailed in the section below.

3.2 Rejected waste

3.2.1 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site and the EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of permit conditions or a potential risk of combustion.

3.3 Waste storage following acceptance

3.3.1 In summary the following different categories of waste are accepted and stored in the following areas prior to further processing:

i) Mixed household, commercial and industrial (HCI) waste is tipped in the areas shown on Drawing No. 001/3306/03 (AREA 1A) and sorted into recyclables by excavator or hand.
ii) The above wastes are then stored in separate using the on-site mobile plant and by hand into containers awaiting removal.
iii) All waste stored on site including those in containers is easily accessible from at least one site to ensure that if a fire occurs, access is available to ensure a fire can be extinguished.

3.3.2 The site will not mix or mechanically process any hazardous waste.

4 Managing waste storage to prevent self-combustion and the fire spreading

4.1 General

4.1.1 The site will comply with Section 9.1 of the EA's FPP guidance in terms of pile sizes guidance and reference should be made to Drawing No. 001/3306/03 which shows the indicative locations of the above wastes. The waste storage table in section 4.2 details the maximum pile sizes which the site will comply with when the relevant areas are not in operation. During operational hours the piles may appear larger due to the constant throughput and quick turnaround of wastes however the operator will minimise pile sizes and store waste materials in their largest form during all instances of out-of-hours as shown below

4.2 Waste storage table

4.2.1 The following table overleaf details the maximum pile sizes and duration for all wastes and other flammable/combustible material stored on site when the site is not operational. This ensures all piles are stored within Section 9.1 the FPP guidance and a minimum 0.5m freeboard is maintained outside of operational hours. The only other waste stored will be inert material comprising sorted soils, brick and rubble which are not combustible.

Table 4.1 – Storage Table Details

Storage Area Details - ALL EXTERNAL PILES - LENGTH & WIDTH OF PILE NOT INCLUDED AS ALL ARE BELOW 20M; VOLUME CALCULATED BY AREA OF PILE										
Plan Ref	**Description**	**Storage type**	**Containment / type**	**Height & width of firewall (m)**	**Max storage height (m)**	**Max. area of pile (m2)**	**Conversion factor used**	**Max. volume of pile (m3)**	**Max storage time**	**Comments**
AREA 1A	Storage area for sorted full skips prior to removal	Sorted	8-cubic yard skips	3.2 & 0.8	1.28	6.29	1	8	72 hours	Pile volume based on one skip. Maximum based on weekend/Bank Holiday storage, normally removed <12 hours.
AREA 2A	Tipping/bulking bay for general waste	Unsorted & freestanding	Interlocking block fire wall	3.2 & 0.8	2.2	48	0.75	36	72 hours	As above
AREAS 3A & 3B,	Sorted skips (plastic & cardboard)	Sorted	40-cubic yard skips	3.2 & 0.8	2.62	14.88	1	40	72 hours	As above
AREA 4A & 4B	Baled plastic and cardboard	Baled	Existing solid brick wall building	4.5 & 0.25	3.5 (three bales high)	32	1	96	72 hours	As above. Volume based on both bale stacks
AREA 5A-5D	Sorted metal skips	Sorted	8-cubic yard skips	3.2 & 0.8	1.28	6.29	1	8	72 hours	See AREA 1A
AREA 6A	Non-ferrous metals	Sorted, mix of free standing and <1,000 litre containers	Existing solid brick wall building or containers	4.5 & 0.25	1	28	1	28	72 hours	See AREA 1A
AREA 7A	Incoming metals/waste	Unprocessed & freestanding	0.1m high bund & existing solid brick wall	4.5 & 0.25	1	28	1	28	12 hours	Area clear 1 hour prior to shutdown

4.3 Conversion factors

4.3.1 The following conversion factors for calculating waste pile sizes are set out below.

Table 4.2 – Conversion Factors

Conversion Factors
Conversion factors for waste piles are worked out using the following methods set out by the Environment Agency
The maximum length width pile is based on the largest dimension – the volume of the pile has been calculated using the area x height x relevant conversion factor
Conversion of 1 for materials stored within containers, area of storage in stackable containers and waste/bale stacks
Conversion of 0.75 for waste stored within a bay comprising volume of rectangle + pyramid
Conversion of 0.3333 for waste stored in a free-standing stockpile
All containers can be moved and are accessible from one side so a fire can be extinguished

4.4 Waste storage residence times

4.4.1 The site will ensure more than one contract is set up with a destination site who can take their recycled waste to prevent a backlog building up on site.

4.4.2 Each pile is inspected throughout the day by operational staff and in the event of a fire has suitable techniques shown in various sections of this FPP to ensure any fire could be extinguished within the limitations set out in the FPP guidance.

4.5 Free standing piles

4.5.1 The table overleaf details the combustible waste piles stored on site and procedures to reduce the risk of the waste combusting.

Table 4.3 – External Pile references and procedures to comply with the FPP objectives

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
AREA 2A Tipping/bulking bay for general waste AREA 7A – Separately bunded area for incoming mixed metals and waste	• AREA 2A will act as the main waste reception / tipping area for mixed HCI waste. AREA 7A will act as separately bunded area comprising mainly metals or an overflow tipping bay for mixed waste if AREA 2A is full. • Any large visible recyclables will be hand-picked or extracted using the mechanical grab and placed into one of relevant storage areas at the site. • In the event of non-conforming or reactive waste discovered, the waste will be immediately consigned to the quarantine area or into a quarantine/rejected waste skip using the above plant or loaded back onto the delivery vehicle and removed off site. • The waste in the stockpile will be tipped at the left-hand side (west) of the pile and then extracted from the right (east) of the stockpile into the adjacent containers to ensure the first in first out principle applies. The process of removing the waste will then be done in a clockwise process. • Stock rotation – It is proposed the maximum duration of waste stored in AREA 2A will be 12 - 72 hours i.e. Sat-Mon if the waste cannot be sorted prior to shut down. In terms of AREA 7A, this area would be cleared one hours. • In order to comply fully with the FPP guidance, the entire pile will be cleared every 12 weeks and deep cleaned to prevent any build-up of material. • As the stockpiles are dynamic, the process of tipping and excavating from the pile will be ongoing which will reduce the actual amount of time the piles will be stored prior to processing. • Both piles are easily accessible due to the building's open front is open a for firefighting purposes. • The pile will be visually monitored continuously throughout the day by trained site operatives. The operatives have been trained via toolbox talks from site management in recognition of fire i.e. the early signs. • It is considered that automated fire detection or further monitoring i.e. thermal camera/probe is not required given the duration of storage (72 hours) and maximum pile volume (36m^3) which are both significantly below the maximum limits stated in the FPP guidance. • There is quick access to the area given so the waste can be quickly removed into the quarantine area in the event of a fire incident. • **No further storage or monitoring procedures required.**

4.6 Waste stored in bale form

4.6.1 The table below details the waste types which are stored in baled form at the site.

Table 4.4 - Combustible waste storage table for baled waste

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
AREAS 4A & 4B Cardboard and plastic bale storage	• This will be an ongoing waste storage process involving the placement of bales prior to being loaded into the removal vehicle in the location shown which will be loaded by forklift with baled plastics. • The site will not bale on a daily basis and will only bale once per week when there is enough material to bale. • The bales will not be stored more than three bales high and only in a row of two to ensure there is access to remove the bales at all time. • The bales will be stored against a solid brick wall measuring 4.5m high meaning there will always be a 1m freeboard available. A firewall is also positioned to the south-east of the pile. • It is proposed that there would only be between 50 – 60 bales stored in this area as a maximum. • It is proposed the maximum duration of waste stored in in this area will be 12 - 72 hours i.e. Sat-Mon if the waste cannot be sorted prior to shut down. • Based on the above storage duration and quantities, it is considered further monitoring using the probe or thermal imagery to provide a full representation of the bale surface temperature and inside the centre of the bales is not considered necessary. • There is quick access to the bales from the roller shutter door so they can be quickly pulled into the quarantine area in the event of a fire incident. • **No further storage or monitoring required other than visual by trained staff.**

4.7 Storage/monitoring procedures (containers)

4.7.1 The table below details the waste types which are stored in containers at the site.

Table 4.5 - Waste storage/monitoring table (containers)

Storage Ref.	Storage/monitoring procedures to reduce the risk of fire
AREAS 1A, 5A – 5D & 7A Containers of sorted wastes	• This area comprises sorted scrap metal and sorted wastes which are stored temporarily prior to being removed from the site. • All containers are open topped for access, moveable by plant, stored on the ground and replaced by an empty container once a full container has been removed off site. • There is access to all containers from at least one side meaning a container or containers can be removed to the quarantine area in the event of a fire incident. • The waste stored in the containers will have been sorted so the waste is unlikely to contain any hot loads or incompatible waste which could lead to a spark or overheating causing a fire. • The maximum duration of waste stored here will be <1 week or sooner if they are filled. Once filled, an empty container would be placed in the same position. • The stored waste will not exceed the height of the containers. • In the event of a fire breaking out in a container, it can be dragged into the quarantine area (if safe to do so) by mobile plant to reduce the spread i.e. to an adjacent waste pile. • **No further storage or monitoring required other than visual by trained staff.**

4.8 Fire walls and bays

4.8.1 The fire walls referenced on Drawing Nos. 001/3306/03 are of the same material and specification as those referenced in below to ensure they are suitable.

a) Resist fire (both radiative heat and flaming); and,
b) Have a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within 4 hours.

Table 4.6 - Fire wall details and specifications

Firewall type	Width	Specification
Interlocking concrete block	0.8m	Class A to EN 13501-1:2007-A1:2009. >120 minutes
Solid brick wall with cemented joints	0.25m	As above

4.8.2 The walls on site will be used to separate waste material where:

i) Waste is stored within 6m of the site perimeter
ii) Waste is stored within 6m of internal/external building walls (with the exception of non-ferrous metal which is considered non-combustible)

4.8.3 **Freeboard** - Where waste material is stored against walls, a minimum 1m freeboard will be maintained so in the event of a fire, flames/waste material will not spread into adjacent bays and accelerate the spread. A 1m freeboard is considered suitable due to duration and volume of waste stored in each bay i.e. it is well below the limits of the FPP guidance.

4.8.4 All waste stored within walls is accessible from at least one side to ensure the waste can be removed using the mobile plant available at the site.

4.8.5 The firewalls will be checked as part of the below daily inspection programme and any other walls installed at the site will be supplied by a BS supplier. The walls will be marked at 1m intervals using paint to ensure staff are aware of the waste storage height permitted for each pile.

4.9 External heating from hot weather

4.9.1 To reduce the risk of self-combustion:

- No combustible waste is stored externally other than waste which has been sorted on site in skips.
- Any oily or dirty rags used on site will be stored in sealed metal containers or plastic wheelie bins inside of the building out of direct sunlight to prevent self-ignition and stored away from heat sources – containers are monitored throughout the day for heat build-up.
- No hot works will take place at the site.
- There is no fuel, petrol or other hazardous fluids or substances stored at the site.

4.9.2 Due to the volume, type and duration of other wastes stored at the site, it is considered that exposure from sunlight will not lead to the waste combusting.

5 Site inspection programme

5.1 Daily checks

5.1.1 Site management are responsible for carrying out daily site walks for checking drainage systems, security measures and waste storage areas. Site management can reference the Fire Checklist shown in Appendix II. The site also carries out weekly inspections for firefighting equipment to ensure they are fit for purpose.

5.1.2 Carrying out the above checks daily will keep the levels of dust, fibre, paper and other loose combustible materials, which could aid in the acceleration of a fire, on site surfaces to a minimum and ensure all containment of wastes on site are functioning effectively in accordance with the storage limitations provided in the table on Drawing No. 3306/001/03.

5.2 Staff training

5.2.1 Operational staff are subject to site inductions which includes basic fire emergency procedures. Site management are suitably trained to carry out these inductions.

5.2.2 A full test (drill) of the procedures in this document will be carried out every 12 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the operator's EMS. The Fire Checklist and training form in this FPP may also be used during the drill.

5.3 Toolbox talks

5.3.1 All operational staff on site have received fire awareness training / tool box talks off trained staff i.e. the operations, site or technically competence manager on their staff induction to detect early signs of fire and to minimise the chance of a fire breaking out in order to meet the three objectives.

6 Quarantine Area

6.1.1 In accordance with the EA's FPP guidance an area of the site has been designated as the quarantine area as shown on Drawing No. 3306/001/03 which is accessible at all times. This area also allows for a 6-metre buffer from the site perimeter and other stored waste or materials on site.

6.1.2 It is considered the largest waste pile/area on site is **AREAS 4A & 4B** and if the area was full would have a volume of 96m^3. The quarantine area proposed has an area of 30m^2 and a volume capacity of 60m^3 which is capable of holding more than 50% of this stockpile. This is based on the quarantine area storing four rows of bales two high considering the baled waste is the largest stockpile on site.

6.1.3 Waste would be moved to the quarantine area using mobile plant available at the site i.e. telehandlers. The out-of-hours storage locations for mobile plant is shown on Drawing No. 3306/001/03.

6.1.4 In the event of a fire, the quarantine area will be used to either isolate wastes which are smouldering to allow safe dissipation of heat without placing other areas on site at risk of ignition; or, to remove any wastes stored in piles/containers near any material affected by a fire to prevent fire spreading to adjacent piles.

6.1.5 Waste will only be moved to the quarantine area if safe to do so following judgement by site management co-ordinating the fire response procedure or the FRS.

6.1.6 **Alternative measures** – Although the Quarantine Area is situated on a concrete slab surface which is not fully impermeable, the wastes stored here would be transient and an investigation of the site surface and drainage system detailed in Sections 11.1 and 11.2 demonstrate why this is considered as a suitable location given it is only a temporary, emergency storage area. This would only be used in extenuating circumstances i.e. a fire and no other purpose. Following wastes being stored in this area, the ground would be sampled and if any signs of contamination were found

within the site or sub-surface, the ground would be remediated and replenished with new, suitable compacted stone material i.e. 6f5 or impermeable concrete.

7 Detecting Fires & Response Procedures

7.1 Fire detection procedure (manual)

7.1.1 If a fire is detected or suspected by a member of staff during operational hours, the relevant person will conduct the following procedure report to site management:

a) Raise the fire alarm (if not already done by another staff member) or sound fire alarms/communicate via radio or ring out-of-hours key holders. **Timescale for this will be upon detection i.e. seconds**

b) Assess the intensity and scale of the fire and make a judgment as to whether the fire can be managed without the requirement for assistance from the emergency services i.e. using the hose or fire extinguishers. **This process should take less than 60 seconds. If fire requires further assistance, a call will be logged to the FRS then the procedures in 8.1 followed.**

c) Initiate evacuation of staff and visitors on site to the meeting point and instruct delegated person(s) to conduct a roll-call to ensure all site users are accounted for. **Timescale variable depending on staff on site – estimated within 5 minutes.**

d) If viable and safe, instruct necessary site staff to commence extinguishment. **Timescale variable depending on size of fire, suppression can be within minutes if safe to do so.**

7.2 Out of hours fire detection (automated)

7.2.1 The site has various cameras throughout the site which provide full coverage to areas storing waste which, these cameras have been strategically placed in areas which are considered most likely at risk of fire in terms of spontaneous combustion and self-heating. The locations of the cameras are indicatively shown on Drawing No. 3306/001/03.

7.2.2 The building which may store small quantities waste out-of-hours will have a smoke alarm which will link to site managements mobile phones.

7.2.3 Details of the site's security infrastructure and 24-hour CCTV and intruder alarm system are outlined in Section 2.6 which are considered ample to prevent arson which could lead to a fire incident. The system is connected to the site offices and staff mobile software via the HIK Central Software, so that the cameras can be monitored during the day and out-of-hours by staff a (see below).

7.2.4 **Alternative measure** - It is not considered necessary to install infra-red/heat (automated) heat detection across other areas of the site due to the following:

i) Out of hours the site will only store a maximum of 96m^3 of waste material internally benefitting from CCTV and a smoke alarm.
ii) The CCTV is intruder alert and link to site management phones so although not an UKAS accredited automated system, intruder, movements will lead to alerts. It is considered arson/break ins would be the biggest fire risk at the site which this CCTV would detect.
iii) The only combustible waste stored externally out-of-hours will be waste stored in containers or a small amount in a bulking bay; this waste will have been sorted and inspected prior to the site closing.
iv) The site will only store waste internally for a maximum of 72 hours during bank holidays; waste is unlikely to spontaneously combust within this timeframe. Externally waste is only stored for up to 1 week and also is in containers.
v) The only mechanical treatment of waste is. baling so the composition/temperature of the waste is unlikely to change from when it was originally deposited to when it leaves site.
vi) The waste piles stored are considerably less (one quarter) than the maximum permitted in the guidance.

8 Fire response procedures

8.1 Response procedure

8.1.1 Further to the above measures, the following procedure would apply:

a) Call the Fire Response Service (FRS) immediately using 999.
b) Call the EA's Emergency Contact Number.
c) Competent person to ensure suitably trained employee initiates the three penstock valves in the site's surface water drainage system shown on the Site Layout & Drainage Plan.
d) Prior to the FRS arriving, inform all neighbouring premises likely to be affected as a result of the fire in terms of potential road closures, smoke inhalation and action to be taken i.e. **stay indoors** (see Section 8.3).
e) If not previously informed, senior management of the company will be informed at this point of the details, nature and extent of the fire and whether assistance from staff from other depots is required.
f) Ensure access routes are clear (see Section 8.2).
g) If safe to do so, site management will inspect the location of the fire, to identify immediate risks to surrounding premises and the FRS.
h) Ensure operators of appropriate machinery are standing by in a safe location to help create fire breaks, under the direction of the FRS when they arrive.
i) Ensure relevant site staff are standing by in a safe location to deploy additional surface water protection equipment where required under the direction of the FRS when they arrive (booms, etc.).
j) Site management will identify themselves to the FRS as soon as they arrive on site and will provide them with a copy of this document and update them with relevant information in terms of fire location, possible reason, waste on fire and projected impact which will assist them in dealing with a fire more effectively.
k) Implement pollution control measures) if safe to do so.

8.1.2 In the event of site management being absent from site, the operator will ensure the TCM or a suitably competent deputy is available during operating hours to take command of an incident should one occur.

8.2 Access for emergency services

8.2.1 The site has clear access points for the emergency services as shown on Drawing No. 3306/001/03. The nearest fire station is approximately 2.0 miles away and is Blackburn Fire Station situated on Byrom Street. The anticipated the response time following a call to the FRS is for them to be on site within <10 minutes. The out-of-hours contact for the site will be situated on the site notice board and this person can provide the FRS with the code for accessing the site on the event of a fire.

8.2.2 The width of the surrounding roads and gateway exceeds the minimum required by the FRS which is 3.7m. Site management will also ensure the 3.7m access routes are maintained throughout the working day and before cessation of works during site inspections.

8.3 Notifying receptors

8.3.1 The contact numbers of key sensitive receptors identified within 1km of the site who could be directly affected in the event of a fire along with the Receptor Plan will be stored within the site office. It is not feasible to have contact numbers for all receptors so the site would rely on the Emergency Services and news outlets to spread the word of the fire along with door knocking/shouting to those receptors who are adjacent within a 50m radius of the site.

8.3.2 As it isn’t feasible for a contact number to be provided for every individual residential receptor and individual business within 1km, the most sensitive receptors and closest business receptors have been included within the table overleaf. it is considered these receptors could pass on the incident to adjacent premises who haven’t been shown on the table overleaf.

8.3.3 Following discussions with the Council, they have advised that once Emergency Services arrive on site i.e. FRS, Police, the lead authority (usually the Police) will co-ordinate a systematic approach to ensure all the relevant sensitive receptors within 1,000m are notified. This will involve via telephone calls, personal visits (knocking on doors) and or using a load speaker while driving around the associated catchment. In addition to this, the Emergency Services would also publicise the fire on their Social Media outlets and contact local news websites, radios who can also provide updates on the incident. The Council will not commit in providing written communication to demonstrate their approach as it would depend on the type/size of fire as they have numerous approaches.

8.3.4 The police with the assistance of ECSS and any other attending authority will ensure all relevant properties are informed of the fire event and given clear instructions of the actions they need to take.

8.4 Control of Combustion Products

8.4.1 Combustion products likely to be associated with the waste stored at the site include PAHs, dioxins and particulate matter including black smoke from general mixed waste and scrap metal. The receptors will be advised of this during notification.

8.4.2 The release of combustion products may be controlled by the low size of waste piles at the site and the swift removal of burning wastes to the quarantine area (thus reducing spread of fire and reducing the amount of combustion products created).

9 Suppressing fires & firefighting techniques

9.1 Internal suppression/alternative measures

9.1.1 Where wastes are stored inside buildings it is considered the below sections and information detailed in Section 7.2.4 will be suitable ensuring the three objectives of the FPP guidance are met without the need for an automated suppression system.

9.2 Site-wide suppression / alternative measures

9.2.1 The site has the following on site suppression measures which are indicatively shown on Drawing No. 3306/001/03:

i) A standard water hose reel (30 l/m flow) strategically placed providing coverage to areas storing combustible and flammable materials.
ii) Mixture of water, foam, powder and CO_2 fire extinguishers located in close proximity to waste piles.

9.2.2 During normal operational hours, there are at numerous members of staff who are fully trained in using mobile plant to assist with fire-fighting which would include suppression using the above and isolating waste at risk of combusting using mobile plant as shown below.

9.2.3 In addition to the above:

- The buildings also have strategically placed water, foam and CO2 extinguishers.
- Out-of-hours plant storage (shovels and forklifts) to isolate waste at risk of combusting in the event of a fire.
- Direct access into the building for external suppression from the FRS (if required).
- All waste piles stored internally are below the limits shown within the FPP guidance in terms of size and duration reducing the size of a fire.
- All staff working in the building can operate the hoses and extinguishers.

9.2.4 Mobile plant i.e. telehandlers will be used to move unburned material to the quarantine area and away from waste that is on fire to prevent it from spreading. The waste on fire which will have been separated will be quenched using suppression by staff or the FRS. The waste will be kept here until the fire has been extinguished. The site could also fill a sealed skip with water and load burning waste into it. Access routes into and out of buildings including out-of-hours plant storage is clearly shown on Drawing No. 3306/001/03.

9.2.5 it is also considered the 3 no. bays (AREA 3) storing non-combustible inert waste which at least one will be full and storing 180m^3 of material can also be used for suppression. This would involve using a telehandler to excavate the material and deposit on the waste which has caught fire. Both the burnt material and the inert material used to stop the fire would be disposed of to a suitably permitted site.

10 Water supplies

10.1 General

10.1.1 Section 16 of the EA's FPP mentions the site should have enough water available for firefighting to take place and to manage a worst-case scenario. A worst-case scenario would be the largest waste pile catching fire. As the site has reduced stockpiles since the previous fires, it is considered that a fire would not spread into adjacent piles due to the measures implemented throughout site which are documented in this FPP.

10.1.2 The largest combustible waste pile on site equates to <96m^3 and to extinguish within 3 hours it would require approximately 207,360 litres (207 m^3) of water requiring a flow of approximately 1,152 litres per minute based on the calculation provided in the table below.

Table 10.1 - Water supply calculations (Largest Stockpile)

Maximum pile volume in m^3	Water supply needed in litres per minute	Overall water supply needed over 3 hours in litres	Total water available on/off site in litres
96	96 x 6.67 = 1152	1152 x 180	207,360 (207m^3)

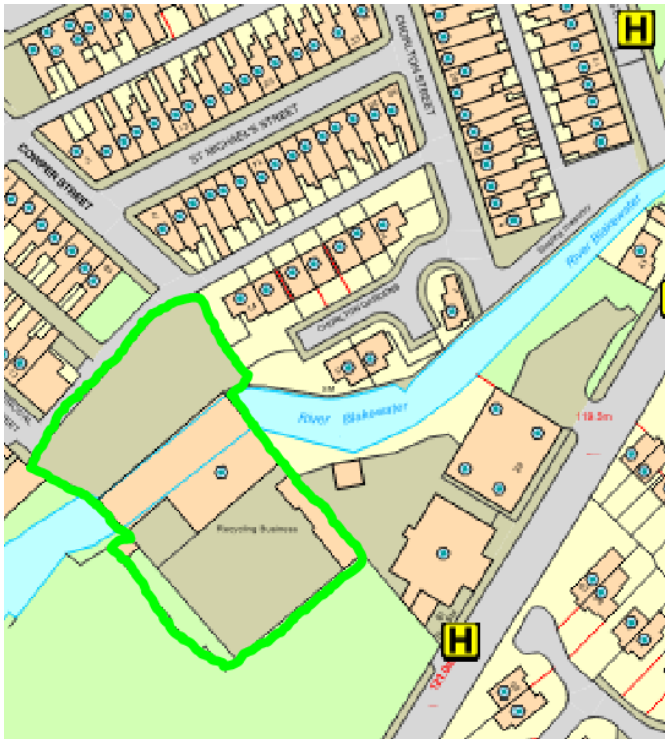
10.2 On-site water supply

10.2.1 The site will have access to on-site hoses which connect to the mains water supply which can be used for dousing any hot loads i.e. in the quarantine area or for any small fires which could break out. A standard hose will have a flow of approximately 30/40 l/m in connected to a high-pressure washer.

10.2.2 There are also a number of fire extinguishers which are strategically placed around the site.

10.3 External suppression - Fire Hydrants

10.3.1 In consultation with the FRS, there is a fire hydrant situated 30m to the south-east of the site on Whalley New Road. The FRS have confirmed the hydrant conforms to British Standard 750 or equivalent and is regularly serviced and maintained by the FRS. Although there is the 4.5m high wall and vegetative area of land which separates the site from the main road, it is considered the hydrant could be used due to the elevated platforms available by the FRS, the FRS would usually tackle a fire using these platforms rather than directly into the site. There is also a second hydrant to the north east of the site Wesley Street, this is approximately 145m from the site and again would require the elevated platforms due to the surrounding 4.5m high brick walls. The location of the hydrants are shown below.



10.3.2 Contact was made with both the FRS and United Utilities and both are unable to provide a flow rate for the hydrant due to potential decolourisation of the water network, therefore, the following guidance extracted from The Local Government Association (LGA) / Water UK National Guidance Document details the following flow rates which should be considered for this site. As the hydrant is located in close

proximity to housing, the recommended minimum flow rates and location of fire hydrants are:

Housing - a minimum of 20 to 35 litres per second through any single hydrant on the development

10.3.3 Using the above calculation, the minimum the flow would be is 1,200l/m and maximum of 2,100 l/m so it is considered the hydrant would be suitable in surpassing the required flow of 1,152 l/m.

10.4 Automated suppression

10.4.1 It is considered that no automated suppression is required for the waste stored in the transfer building or wider site due to the minor quantities stored. Reference should be made to Section 7.2.4 and 9.2 in terms of suitable alternative measures. References of existing suppression i.e. hoses, extinguishers are shown on Drawing No. 3306/001/03.

11 Managing Fire Water

11.1 Drainage

11.1.1 The drainage arrangements for the site are clearly shown on Drawing No. 001/3306/03 and as all of the site operational area is concreted, falls into a centralised gully, into an interceptor then into the foul sewer network. This drainage has been in place following the issue of the permit in 1995. The tank is monitored at least weekly and also alarmed when two thirds full so a drainage contractor can be called in advance to empty the tank.

11.2 Containment of Fire Water

11.2.1 Following a review of the underlying geology of the site, the site overlies the Pennine Lower Coal Measures Formation which is defined as a Secondary A aquifer with a low-medium groundwater vulnerability. The nearest borehole to the south of the site comprises a mix of 11.3m of clay and boulder clay meaning there is a negligible risk that any surface water on site can permeate into the ground and into adjacent surface waters.

As the underlying geology is boulder clay which is considered impermeable, surface water would build up on site in the external yard area shown on Drawing No. 001/3306/03 which is surrounded by 4.5m high brick wall and create a lagoon effect. The external yard area measures approximately 1,150m^2. Although the whole of the containment area site is not situated on impermeable concrete, the underlying geology would be considered impermeable as water could not permeate through it. Surface water cannot escape off site so it is considered the site would be sealed in the event of a fire as demonstrated in the next section.

11.2.2 In the event of a fire, as the site surface is generally falling towards the south (away from the access) and is entirely sealed by the brick wall with no escape points, the fire water is likely to flood the site creating a lagoon effect.

11.2.3 It is considered the only way fire water would run off site would be though the drainage system into the foul sewer or through the building and out of the car park area to the north of the site. In the event of a fire, all access points of the building would be sealed using fire water booms (see section 11.3), the central gully would have a clay dammit placed over it and a penstock would be initiated on the interceptor demonstrating the firewater could not escape from the site and create a lagoon as demonstrated in the section above.

11.2.4 As detailed in Section 10.1.2, the largest pile on site would require containment for litres 207m^3 of water in accordance with the FPP guidance. All concrete areas of the site are either sealed by the 4.5m high brick walls so based on this, there is suitable containment on site as shown in the table below.

Table 11.1 - Firewater Containment Calculation for External yard

Volume of Water (m^3)	Containment Area (m^2)	Containment Required	Total Containment On Site
207	1,745 (external yard and sealed building)	207 / 1,745= 0.12m^3	0.16m with booms + the 4.5m high brick walls

11.3 Removal of fire water

11.3.1 Upon successfully extinguishing a fire all standing fire water would be pumped using a hired-in vacuum tanker and deposited to a suitably permitted site.

12 After an incident

12.1 Contingency Planning

12.1.1 In the event of a fire the site will cease accepting waste. All customers who wish to deliver wastes during a fire will be notified by site admin staff and any who arrive without prior notification will be turned away. If urgent, deliveries will be directed to an alternative waste facility in the borough; details of which can be found on the EA's public register.

12.1.2 No waste will be accepted on site until the post-fire site recovery procedures outlined in the section below have been fully implemented and the site is authorised to re-open for trade and waste acceptance.

12.2 General recovery procedure

12.2.1 When the fire has been successfully dealt with the following actions will take place:

a) All fires will be reported to the EA on the working day that they occur including all steps taken by site staff, management and/or emergency services to deal with the fire.
b) Removal of burnt material to a suitably permitted site.
c) Investigation into the cause of the fire, to ensure it does not reoccur.
d) A review of the FPP and EMS, associated amendments will be implemented.
e) Review of any additional training requirements for site personnel as a result of the incident.
f) All fire extinguishers used to tackle the fire will be serviced and replaced after use.

12.2.2 In addition to the abovementioned procedures, the sections below outline specific procedures following a fire

12.3 Site decontamination

12.3.1 Surface water on site will be cleared using the following method:

a) Sample fire water for any POPs and advise the EA or drainage contractor of the analysis ensuring its safe disposal.
b) Using a tanker/sucker, all standing fire water should be sucked up and taken off site or stored in a tank/bowser prior to removal off site.
c) Using all available resources, manually clean out the surface drainage system and underground tank removing the debris to the pile of fire damaged waste for removal to landfill or permitted site.
d) Using a road sweeper, sweep the yard (damp as required using the bowser) until all ash and clinker has been removed.
e) All debris has now been isolated and all contaminated water holding areas have been cleaned and emptied.
f) Wash the yard down in entirety using clean water or allow a reasonably heavy rain shower to wash the yard down.
g) It is at this stage that site management should decide whether to repeat areas of the clean-up.

12.3.2 If the clean-up operation has been deemed complete and the site is deemed suitable for accepting waste, the site will ensure the following:

a) Account for all consumables that have been used in the fire and re-order / replace immediately.
b) Restack, and re-locate all items used for the surface water protection during the fire to their storage locations ready for future deployment.
c) Check monthly that items are still present and correct and still serviceable for use in an emergency.

12.3.3 The operator will liaise with the EA throughout the event ensuring they are satisfied with the clean-up programme and notify the operator when the site can begin accepting waste again onto site.

12.3.4 Due to the nature of the site's customers, there are no regular waste contracts which need to be dealt with if the site is closed for a period of time due to any incidents.

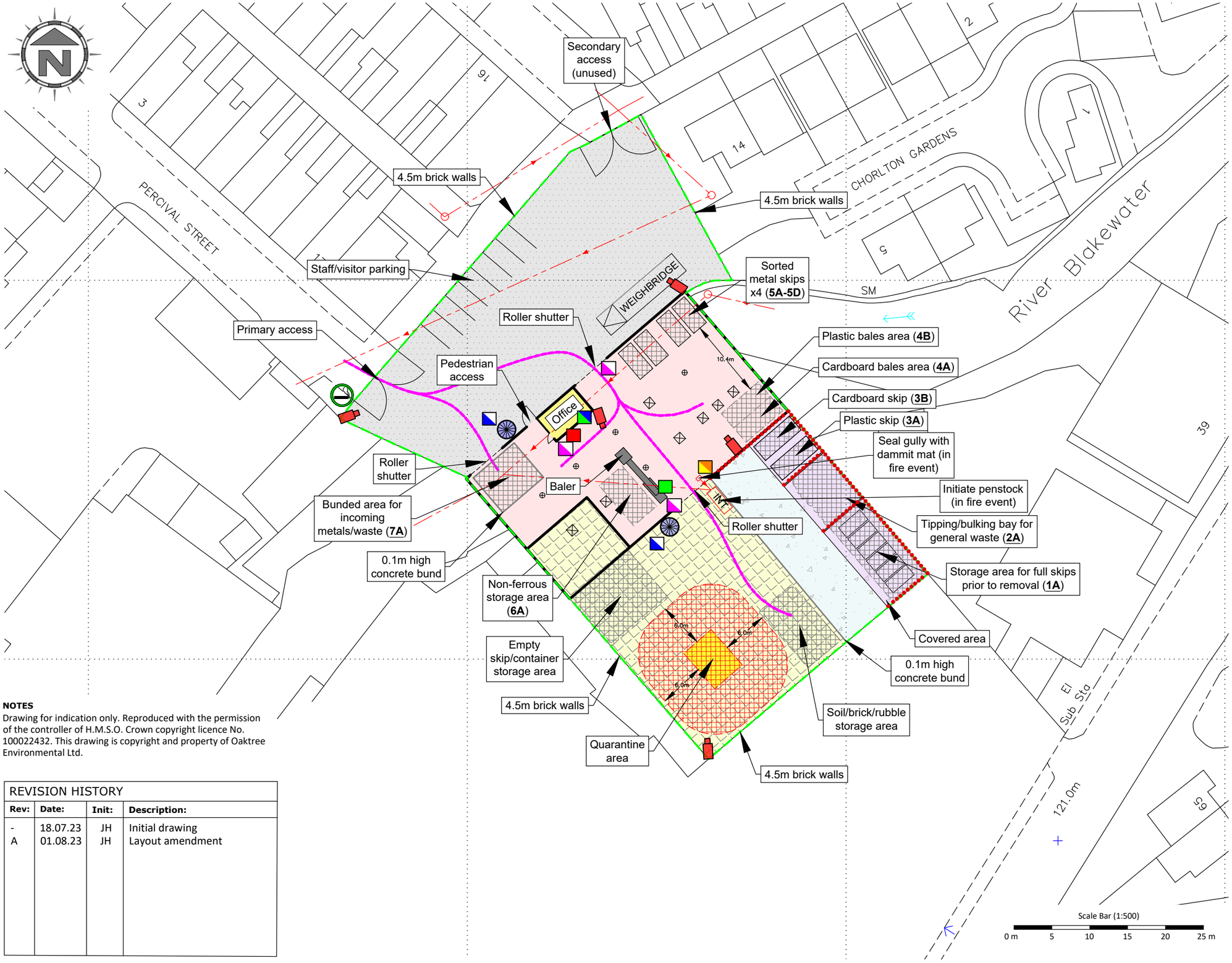
12.4 Post fire site recovery

12.4.1 If a recovery procedure is required, the operator would instigate the following;

a) Remove damaged material to a permitted facility that can deal with it legally.
b) Ask engineers to carry out repairs on any plant, vehicles and/or infrastructure.
c) Assist the FRS with the fire investigation and where necessary engage the advice from a professional fire consultant.
d) Review the FPP procedures and improve upon those which were found deficient.
e) Review training requirements for staff.
f) Assess whether further preventative measure could be implemented.
g) Ensure all fire equipment, where used, is replenished.
h) Remove fire water to a permitted facility for disposal.

Appendix I

Drawings



KEY:

- Permit boundary
- Storage areas
- Covered area
- Sealed recycling building
- Concrete area
- Concrete slab area
- Mixed tarmac/ concrete surfacing
- Other buildings (offices etc.)
- Quarantine area
- Spill kit
- Fire fighting equipment (extinguishers etc.)
- Mains water
- Fire alarm
- Plant shut off
- Access routes for emergency vehicles
- Concrete block firewall
- Designated smoking area
- Roof supports
- 10,000 litre water tank (x2)
- Foul drainage
- Manholes
- Surface gully
- Intruder alert CCTV camera locations (indicative location)
- Fire water containment equipment (Drain mat & Penstock valves)

NOTES

Drawing for indication only. Reproduced with the permission of the controller of H.M.S.O. Crown copyright licence No. 100022432. This drawing is copyright and property of Oaktree Environmental Ltd.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	18.07.23	JH	Initial drawing
A	01.08.23	JH	Layout amendment

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
Ellen Shirley Limited

PROJECT/SITE
Percival Street Mill, Percival Street, Blackburn, Lancashire BB1 6HN

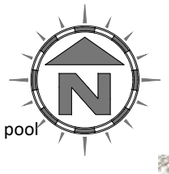
SCALE @ A3	CLIENT NO	JOB NO
1:500	3306	001

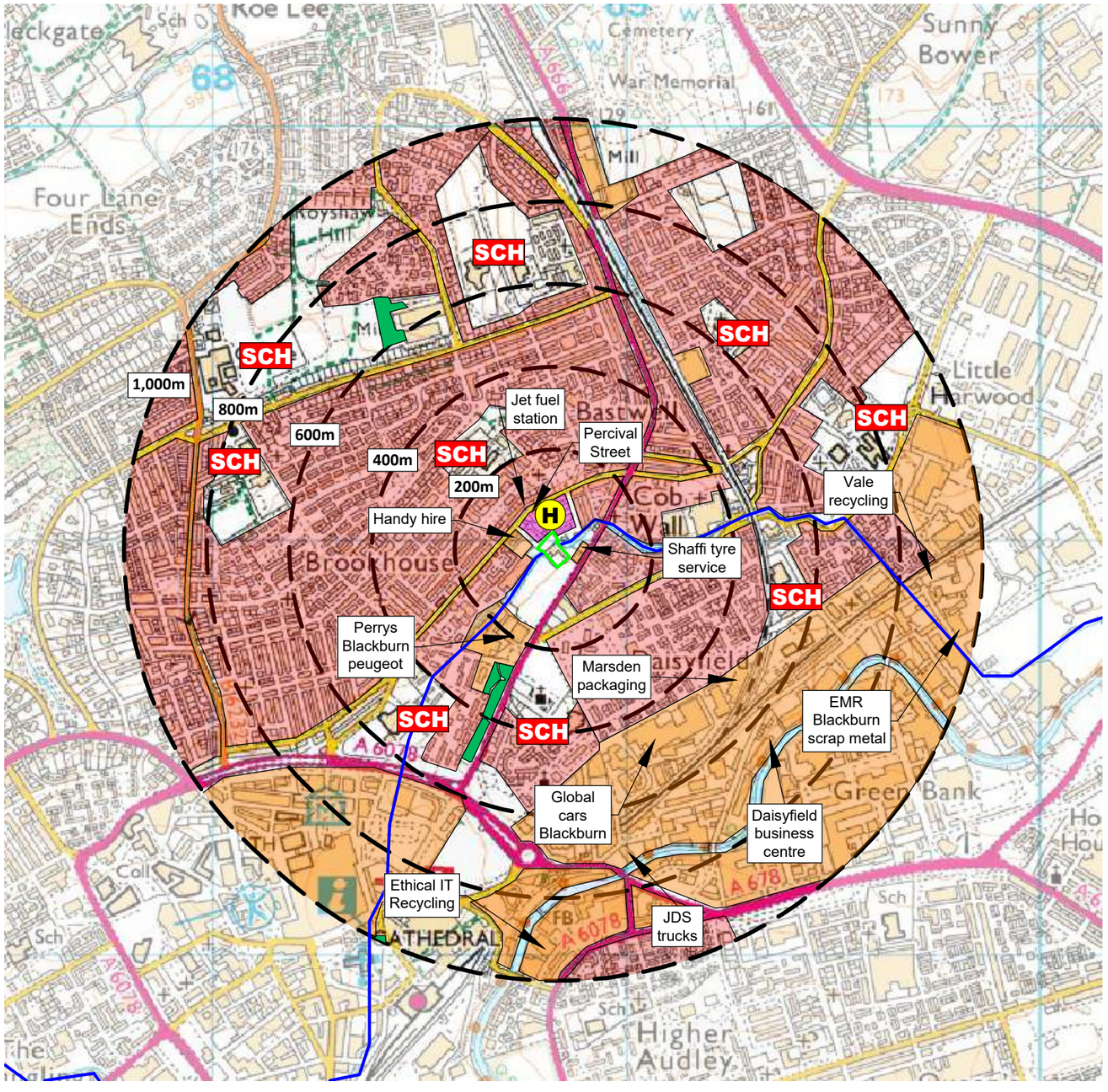
DRAWING NUMBER	REV	STATUS
3306-001-03	A	Issued

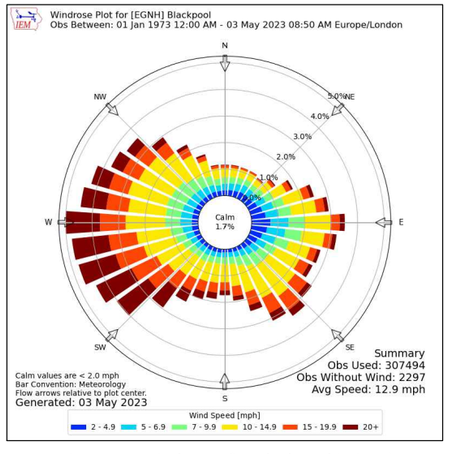
DRAWN BY	CHECKED	DATE
JH	RS	01.08.23

KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Nearest residential receptor block
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- School
- Woodland areas
- Priority habitat inventory (deciduous woodland)







Compass Wind Rose for Blackpool (EGNH)
Period 1973-2023
- source: Iowa State University

Scale Bar (1:12,500)

0 km 500 m 1 km

NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	19.07.23	JH	Initial drawing
A	02.08.23	JH/CP	Minor updates

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants

DRAWING TITLE
RECEPTOR PLAN

CLIENT
Ellen Shirley Limited

PROJECT/SITE
Percival Street Mill, Percival Street, Blackburn, Lancashire BB1 6HN

SCALE @ A3	CLIENT NO	JOB NO
1:12,500	3306	001

DRAWING NUMBER	REV	STATUS
3306-001-04	A	Issued

DRAWN BY	CHECKED	DATE
JH/CP	RS	02.08.23

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Appendix II

Record Keeping Forms

ELLEN SHIRLEY LIMITED
SITE INSPECTION FORM (DAILY INSPECTIONS) – ESL/RF/4

WEEK STARTING								
TYPE OF INSPECTION		DAY						
		M	T	W	T	F	S	S
FIRE EXITS, ESCAPE ROUTES AND CALL POINTS FREE FROM STORAGE OF WASTES/CONTAINERS								
SITE ENTRANCE/NOTICE BOARD								
SECURITY - GATES								
SECURITY - FENCING								
SITE ROADS (CLEAR FROM HAZARDS)								
IMPERMEABLE CONCRETE AREAS (INTEGRITY)								
HOLDING TANK / SUMP								
FUEL & GAS STORAGE AREAS								
BAY WALLS (STRUCTURAL INTEGRITY)								
FIRE BREAKS IMPLEMENTED (WHERE NECESSARY)								
WASTE STORAGE LIMITS	MIXED WASTE							
WASTE STORAGE LIMITS	CONTAINERS/SKIPS							
STORAGE LIMITS	OTHER WASTE							
COMBUSTIBLE WASTES (AWAY FROM POTENTIAL IGNITION SOURCES)								
REJECTED WASTE TYPES / STORAGE								
NOISE LEVELS								
FIRES (ANY INCIDENTS REPORTED)								
QUARANTINE AREA CLEAR OF WASTE								
NO SMOKING SIGNS IN PLACE								
FIRE FIGHTING EQUIPMENT								
PLANT/EQUIPMENT MAINTENANCE CHECKS								
HOT EXHAUSTS FIRE WATCH (DUST/FLUFF CLEANED REMOVED)								
OFFICE/WELFARE FIRE RISKS CHECKED								
LITTER								
DUST								
ODOUR								
VERMIN								
RECORDS								
COMPLAINTS RECEIVED								
OTHER (SEE NOTES BELOW)								
INSPECTION CARRIED OUT BY								

NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
Sheet		***of***	

ELLEN SHIRLEY LIMITED
PREVENTATIVE MAINTENANCE CHECKLIST

CHECKED BY	**POSITION**
DATE	**DATE OF LAST CHECKLIST**

	EQUIPMENT ITEM					
OFFICIAL MAINTENANCE CHECK REQUIRED (Y/N)						
IF NO, DATE OF LAST CHECK						
IF YES, DATE OF NEXT CHECK						
IS ITEM IN CORRECT WORKING ORDER						
LEAKAGES OF OIL/DIESEL ON MOBILE PLANT / VEHICLES						
IF NO, WHAT REPAIRS ARE REQUIRED (USE SEPARATE SHEET IF REQUIRED)						
WERE REPAIRS DETAILED ON THE LAST CHECKLIST						
IF YES, HAVE THEY BEEN CARRIED OUT						
ADDITIONAL REPAIRS OR ACTIONS REQUIRED						

ELLEN SHIRLEY LIMITED - EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW

EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW

EMPLOYEE NAME				**DATE COMPLETED**			
POSITION				**REVIEW DUE**			
TRAINER				**OUTCOME**	**PASSED**		
POSITION					**FURTHER TRAINING REQUIRED**		
CARRIED OUT /SIGN OFF >	**Y/N**	**SIGNED BY EMPLOYEE**	**SIGNED BY TRAINER**		**Y/N**	**SIGNED BY EMPLOYEE**	**SIGNED BY TRAINER**
ENVIRONMENTAL PERMIT				**FIRE PREVENTION PLAN**			
MANAGEMENT SYSTEM				**FIRE SAFETY**			
SITE RULES				**EMERGENCY PROCEDURES**			
RECORD KEEPING / TRANSFER NOTES				**STORAGE /PILE SIZE LIMITS**			
RECOGNITION OF WASTE TYPES				**STORAGE DURATION**			
SECURITY				**FIRE DETECTION**			
VEHICLE CHECKS				**FIRE ALARMS**			
PLANT OPERATION				**FIRE FIGHTING EQUIPMENT**			
PLANT CHECKS				**FIRE WATER CONTAINMENT MEASURES**			
AMENITY - LITTER, ODOUR, PESTS etc.				**SPILL CLEARANCE**			
NOTES AND ACTIONS:							