Fire Prevention Plan

Site name:	New Hall Farm Paper Drying Facility
Site address:	New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL
Operator name:	Robert Skelton Contractors Limited
Permit reference:	EPR/EP3922SL
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1. Introduction

Overview

This document, comprising a Fire Prevention Plan (FPP) has been prepared by Shann Pitts Consulting Limited on behalf of the Operator Robert Skelton Contractors Limited herein termed 'the Operator' to support an Environmental Permit application for a new bespoke permit application for non-hazardous waste treatment activity at New Hall Farm Paper Drying Plan, New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL herein termed 'the site'.

The waste treatment activity constitutes the drying of wet paper sludge waste from paper mills on 4 No. drying floors utilising waste heat from 4 No. biomass boilers (which are operated under a Part B permit from Allerdale Borough Council, ref: PPC/ABC/B/26) on site. The dried paper may be blended with sawdust (produced on site) to produce a material suitable for animal bedding or alternatively sold as a pure dried paper product. In addition to the main waste treatment activity, there is associated waste storage prior to and after the waste treatment (drying).

This FPP will form part of the site specific Environmental Management System. The FPP exists as a standalone document for easy reference by Cumbria Fire and Rescue Service, the Environment Agency, the Operator and other interested stakeholders. This FPP is a live document with all monitoring procedures, responsibilities and compliance actions being updated as and when required.

This FPP sets out the fire prevention measures and procedures that will be put in place and adhered to on site. The FPP also details proposed actions in the event of a fire on site.

The Environment Agency will be consulted on all final versions of this document and their responses will be incorporated.

Objectives

This Fire Prevention Plan has been designed to meet these three objectives:

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

This guidance has been written with reference to the latest Environment Agency guidance on Fire prevention plans: environmental permits[1] and the Waste Industry Safety and Health Forum document 'WASTE 28 Reducing fire risk at waste management sites issue 1 - October 2014 '

This plan is for employees and contractors working on site, Cumbria Fire and Rescue Service, the Environment Agency and any other interested stakeholders.

[1] https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits Accessed 28 March 2024

2. Types of combustible materials

Combustible waste

The potentially combustible waste materials that are stored on site are detailed in Table 1 below. Further detail on the associated storage arrangements is in the 'Managing waste piles' section:

Table 1: Waste Types

European Waste Catalogue (EWC) Code	Description
03	**WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD**
03 03	wastes from pulp, paper and cardboard production and processing
03 03 05	paper sludges from paper recycling

On-site at any one time there may be:

- Wet paper sludge awaiting drying in a stockpile in the covered yard area.
- Drying material on the 4 no. drying floors being dried. It takes approximately 2 days to dry one load. 6 to 7 loads a week are accepted for drying (each weighing 28.5 tonnes).
- Dried paper sludge in 2 No. storage bays pending dispatch or blending with sawdust

Blended sawdust / paper is not stored on site. It is blended to customer order on a just in time basis.

Note under normal operating conditions, only three of the drying floors will be used. The fourth drying floor has been included within the permit boundary and permit application such that it can be used as a contingency if there are any issues with individual boilers and / or drying floors.

Persistent organic pollutants

There is the potential for persistent organic pollutants to be in paper pulp waste however, the EWC code accepted for treatment on site 03 03 05 is absolutely non-hazardous.

Other combustible materials

The wider site is used for production of dried firewood and wood pellets for UK distribution. Therefore, there are other combustible materials stored in proximity to the proposed permitted area, but not within it.

Wood storage areas are shown on the Whole Site Layout Plan.

Diesel is stored in a 3,500 litre bunded tank outside the permitted area.

3. Using this fire prevention plan

Where the plan is kept and how staff know how to use it

A copy of this Fire Prevention Plan will be kept in the Site Office, including a copy on the Notice Board and a copy of the final approved Fire Prevention Plan will be provided to the Environment Agency and Cumbria Fire and Rescue Service.

This plan is for employees and contractors working on site, Cumbria Fire and Rescue Service, the Environment Agency and any other interested stakeholders.

Testing the plan and staff training

All staff will be trained on the Fire Prevention Plan during their induction training and this training will be refreshed annually or after any amendment to the Fire Prevention Plan, whichever occurs soonest. Training will be recorded in each individual employees training records.

All contractors working on site will be trained in the key elements of the Fire Prevention Plan as part of their Site Induction Training. This will be recorded in the Site Induction Training file.

All training on the Fire Prevention Plan will comprise the actions to be taken:

1. To prevent a fire occurring; and
2. During a fire if one breaks out.

In addition to classroom style training the Operator will also carry out annual fire exercises to test the efficacy of the Fire Prevention Plan and the training of staff. These training exercises will involve the Fire and Rescue Service and / or the Environment Agency wherever possible.

4. Site Description

Activities at the site

- Receipt of wet paper sludge in covered tipper trucks.
- Storage of wet paper sludge in stockpile in covered yard – 1 week maximum.
- Transfer of wet paper sludge onto 4 No. drying floor using telehandler.
- Drying of paper sludge on 4 No drying floors. Takes approximately 2 days. The 2 no. drying floors together are at approximately 32 degrees C. The 2 no. newer drying floor operate at higher temperatures (85 – 95 degrees C), they have a lower fan speed from heat exchanger (also takes 2 days)
- Removal of dried paper sludge into internal dry paper storage bays using telehandler.
- Storage of dried paper sludge for up to 1 month.
- Blending of dried paper sludge with sawdust to customer requirements. This is carried out in a building. Ratios vary based on customer requirements. Made to order / not stored.
- Dispatch of blended product in tractor and covered trailer or covered lorry.

Sensitive receptors near the site

On 15 January 24 a response to a pre-application Habitats and Nature Conservation Screening request was received from the EA (ref: EPR/EP3922SL/P001) and it was stated that 'Habitats and/or protected species which you need to consider in your permit application have not been identified'.

The site is outside any:

- Source Protection Zone
- Drinking Water Safeguard Zone
- Drinking Water Protected Area[2]

The site is within an area designated as medium – low groundwater vulnerability.

The Sepulchre Beck runs approximately 110m to the south east of the proposed site boundary. This waterbody is within the Ellen (lower) Water Body which under the Water Framework Directive was classified as having a poor ecological status in 2019 and 2022.[3]

There are no discharges to water from the site. The wet paper sludge storage area drains to a sump which is pumped out into a container and removed off-site for treatment i.e. a sealed drainage system. The dried paper is stored in bays inside the building and benefit from an impermeable surface; there is no risk of runoff from these areas during normal operations.

[2] https://magic.defra.gov.uk/MagicMap.aspx Accessed 12 February 2024
[3] https://environment.data.gov.uk/catchment-planning/WaterBody/GB112075073640 Accessed 26 February 2024

All other areas where there is no waste storage or treatment are designated as clean and discharge to the adjacent clay lined lagoon. When the lagoon is full it overflows to the Sepulchre Beck. The discharge to the beck can be blocked off to retain water on site.

The site is within flood zone 1 has a low probability of flooding from rivers and the sea.[4]

Human receptors within 1km of the site are shown in Table 2 below and on the Human Receptor (1km) Plan.

Table 2: Human Receptors (1km)

Receptor ID	Receptor name	Receptor type	Distance to site boundary (m)	Direction from site
H1	Harker Marsh houses	Residential	215	North west west
H2	Harker Marsh houses	Residential	225	North north west
H3	Florence House Adult Daycare Centre	Amenity / Workplace	545	North east
H4	Craika Road houses	Residential	515	North
H5	Shepherd Hall (inhabited by an employee)	Residential	560	South east
H6	North east of Broughton Moor	Residential	935	South west west
H7	Crooklands Farm	Residential	920	North west
H8	Fox House	Residential	960	South south east
H9	Moorside Farm	Residential	955	North north west
H10	Houses on Seaton Road	Residential	925	South west

[4] https://flood-map-for-planning.service.gov.uk/ Accessed 12 February 2024

Site plans (See Appendix A)

Site Location Plan (SPC0130/LocationPlan/Rev A)

Permitted Boundary Plan (SPC0130/BoundaryPlan/Rev A)

Human Receptor (1km) Plan (SPC0130/HumanReceptor(1km)/Rev A)

Whole Site Layout Plan, V1,0 May 2024(Fire suppression & CCTV locations)

Paper Drying Layout Plan, V1.0 May 2024

Emergency Plan EV10 (Site access, assembly points & emergency shutdown switch location)

5. Manage common causes of fire

Arson

The risks of arson and vandalism will be controlled through site security measures. There are 16 No. CCTV cameras linked to the operators phone and a screen in the Site Office. The CCTV system has an alarm system to detect movement out of hours which is directed to the Site Managers phone. The location of the CCTV cameras is shown on the Whole Site Layout Plan.

The site owner who is the Site Manager lives on site and checks the site twice every day of the week; first thing in the morning and every night. If there are any issues with the boilers, an alarm is sent to the Site Managers mobile phone. If the Site Manager is away then his brother checks the site and who lives 500m from the site entrance.

Plant and equipment

On site equipment relevant to the waste treatment activity includes:

- 1 No. telehandler
- 4 No. drying floors

The following measures will be taken to prevent fires on site:

1 There is a full preventative maintenance and inspection programme in place for all static and mobile plant and equipment. See Section 7.5 Operations Management (including Maintenance Plan of the Environmental Management System Manual **(SKE-OD-01)**).

2 All mobile plant is fitted with fire extinguishers.

3 All mobile plant that isn't being used will be kept away from combustible waste.

4 All vehicles entering and leaving the operational site will be checked by Site Operatives for evidence of fuels and combustible liquids leaking or trailing vehicles. Vehicles with leaking fuel or oil evident will be turned away from site and the Spillage Procedure **(SKE-SOP-03)** initiated.

5 On-site mobile and fixed plant will be checked for leaking oils and fuels as part of Daily Checks **(SKE-MP-01)** and the Spillage Procedure **(SKE-SOP-03)** and additional maintenance carried out accordingly.

6 There will be a fire watch carried out at the beginning of the working day, midday and at the end of the working day which includes a check to see if there is any dust settling on hot exhausts and engine parts; Daily Checks **(SKE-MP-01)**.

Electrical faults including damaged or exposed electrical cables

Electrics certification

A full inspection of the electrics was carried out on 28 March 2024.

Electrical equipment maintenance arrangements

Harrison Electrical (Cumbria) Limited have been contracted to undertake regular inspection and maintenance of the electrical systems on site.

Discarded smoking materials

Smoking on site policies

There is a no smoking policy on site and signage to support this policy.

Hot works safe working practices

Overview

Unless essential to the site operations, welding grinding etc. is not carried out within the site. If any welding or grinding is required it is carried out by qualified engineers and in accordance with a Permit to Work detailing the appropriate control measures e.g. fire retardant sheeting.

Risk assessments and method statements associated with the Permit to Work are used to prevent fire and will specifically detail the work to be carried out, how and when it is to be done and the precautions to be taken.

The use of a permit system does not, by itself, make the job safe. It supports the safe system, providing a ready means of recording findings and authorisations required to undertake hot work.

The Permit to Work system will check the following items (where appropriate):

- Preparation of work area, including isolation, emptying, cleaning, removal of flammable materials etc.
- Good housekeeping
- Use of protective curtains
- Regular maintenance and inspection of all 'hot works' equipment
- A competent person (not carrying out the hot works) will visit the area after the hot works has finished to ensure that no smouldering embers or hot surfaces remain
- Provision of suitable fire extinguishers

Use of the Permit

- Before any hot works or welding takes place on site, contractors must complete a Permit to Work form for sign off by the Technically Competent Manager and the contractor responsible for the work. Only hot works authorised by a Permit to Work will go ahead.

End of Operations

- On completion of hot work, the Permit to Work must be signed-off and returned to the permit issuer, stating that the work area is safe for normal operations and that all workers are clear from the work area. The operator will check the essential services and if agreed, the Permit to Work will be signed off as completed.

- Additional fire watch inspections are carried out after hot works; directly after work has been completed and three hours after work has completed. This will be carried out by a competent person (not carrying out the hot works). If necessary, the Operator will carry out this fire watch inspection outside normal working hours.

Re-issue of the Permit

- If the work has not been completed before the Permit to Work expires (1 day), a re-issue of the Permit to Work is required. The responsible person must visit the location and ensure that conditions have not substantially altered since the certificate was initially issued. If the conditions have altered the situation must be reassessed and, as necessary, further controls should be specified.

Operation Review and Revision

- Following each operation the procedures will be reviewed and revised, as necessary.
- Periodically, persons in charge should review the Permit to Work system to ensure that permits are being correctly completed, and that the required controls are being adopted.

Industrial heaters

Use of industrial heaters

There are no industrial heaters on site.

However there are 4 No. Biomass boilers for waste wood operated under a Part B permit from Allerdale Borough Council.

There are also 3 No. biomass boilers on the wider site which utilise virgin wood.

Hot exhausts and engine parts

Fire watch procedures

Fire watch including vehicle exhausts is carried out throughout the working day and recorded on the Daily Checks **(SKE-MP-01).**

Ignition sources

This section does not apply as there will be no naked flames, space heaters, furnaces, incinerators or other sources of ignition within 6m of waste.

Batteries

There are no batteries stored on site. When maintenance work is carried out on the telehandler, any resulting waste is taken off site by the mobile mechanics.

Leaks and spillages of oils and fuels

On-site mobile plant will be checked for leaking oils and fuels on a daily basis in accordance with Daily Checks **(SKE-MP-01)**. If spillages are observed then the Spillage Procedure **(SKE-SOP-03)** will be initiated and additional maintenance carried out accordingly.

Build-up of loose combustible waste, dust and fluff

The telehandler is inspected and cleaned as necessary on a daily basis; Daily Checks **(SKE-MP-01)**. Dust, waste and fluff are removed to help minimise the risk of an electric fire.

The site is checked for the build-up of loose waste, dust and fluff in accordance with the Daily Checks **(SKE-MP-01)** and housekeeping carried out to ensure a tidy site.

Reactions between wastes

This section does not apply as a single non-hazardous waste type is accepted and treated on site.

Waste acceptance and deposited hot loads

There is a low risk of 'hot loads' or loads with hazardous materials in them such as gas cylinders, batteries or containers of flammable liquids, which can subsequently cause a fire. All of the waste accepted on site comes from a single waste broker and directly from the site of production.

The control measures in place are a Waste Acceptance & Rejection Procedure **(SKE-SOP-01)** that prevent unauthorised waste being accepted. In the instance of a hot load being accepted the dedicated waste quarantine area would be used. See Section 9 Quarantine Area.

Hot and dry weather

All waste is stored inside and would not be susceptible to increased fire risk during hot and dry weather.

6. Prevent self-combustion

General self-combustion measures

There may be a low risk of self-combustion arising from the stored material but this is managed by on-site procedures:

- Limiting storage times and tonnages
- First in first out procedures for wet and dry material.
- Use of temperature monitoring probe on any waste stored for longer than 2 weeks.

Manage storage time

In the winter months, demand for dried paper is higher and wet paper material is rarely stored before placing on the drying floors. Similarly, dried paper leaves the site quickly due to high demand.

In the summer months, demand for bedding materials is generally lower and wet paper may be in stockpile for up to 1 week (maximum 60 tonnes) and dried paper material may be stored for up to 1 month (maximum 250 tonnes).

Method used to record and manage the storage of all waste on site
All paper loads come in and out over weighbridge hence there is a record of waste on site at all times.

Stock rotation policy
A first in first out procedure is used for wet paper sludge and dried paper material in accordance with the Waste Handling and Management Procedure **(SKE-SOP-02).** Blended dried paper is not stored on site but blended on a 'just in time' basis to meet customer requirements.

Monitor and control temperature

Reduce the exposed metal content and proportion of 'fines'
This section is not applicable as no metal 'fines' will be present in the waste types.

Monitoring and controlling temperature
To ensure that prevention methods are effective and to further reduce the risk of self-combustion, temperature monitoring of dry paper sludge is carried out every operational day if the waste has been stored for longer than two weeks. Wet paper is only stored for up to 1 week.

A 2 metre long probe is inserted into each heap at three different locations (including the middle and the back of the pile) and the highest of the three temperatures detected is recorded along with the ambient temperature.

If the temperature is above 40^{o}C in any pile or if a consistently rising trend above 35^{o}C is observed:

1. The Site Manager will be informed
2. The storage pile will be spread out to cool for at least one hour
3. The storage pile will be restacked.
4. Temperature monitoring will be repeated at three locations within the pile.

5. The event will be recorded in the Site Diary.

Temperature is monitored in all heaps daily; this frequency will be reduced to weekly for specific products / wastes if after a period of 12 months it can be shown that self-heating is controlled through management techniques. Temperature monitoring will be recorded on the Temperature Monitoring Log Form **(SKE-FT-03).**

Dealing with hot weather and heating from sunlight

All waste storage and treatment is in a building undercover and protected from heating from direct sunlight. The nature of the waste treatment process is that the waste will be externally heated and this is accounted for in the management techniques.

Waste bale storage

This section does not apply – there are no waste bales on site.

7. Manage waste piles

Storing waste materials in their largest form

This is not applicable to the waste streams that are treated on site as there is no change in size, just dry matter increasing through drying activity.

Maximum pile sizes for the waste on your site

Table 3 below provides maximum pile sizes for waste stored.

Table 3: Maximum waste pile sizes

Waste stream	Location	How is it stored	Max length (m)	Max width (m)	Max height (m)	Volume (m^3)	Max time it will be stored
Wet paper sludge	Covered yard	Single stockpile undercover	12	4	2	96	1 week
Dried paper bay 1	In building	Three sided concrete bay	12	7.6	2	182.4	1 month
Dried paper bay 2	In building	Three sided concrete bay	12	7.6	2	182.4	1 month
Blended product	Not stored – 'just in time' blending car-ried out	NA	NA	NA	NA	NA	NA

Waste stored in containers

Not applicable.

8. Prevent fire spreading

Separation distances

The wet paper sludge stockpile has a 6m separation distance around it to prevent fire spreading, except for the firewall behind it(see below).

Storage of waste in bays

Wet paper is stored against a concrete panel wall. The drying floors are surrounded by concrete panel walls on three sides. Dried paper is stored in 2 no. dedicated three sided bays made from concrete panels.

All of the concrete panels are H180 concrete panels (1m x 6m) which are 180mm thick. They have a fire rating of 2 hrs (see Appendix B for specification document).

The fire risk arising from storing paper within bays is further controlled through management techniques.

- In accordance with the Waste Handling & Management Procedure **(SKE-SOP-02)**:
    - There is a 1m freeboard between the top of the paper and the top of the concrete panel wall.
    - A first in first out policy is enacted by noting down at the bay entrance the dates that the dry paper bay has been filled with waste. When material is dispatched use the dried material in the bay holding the oldest material and ensure that the bay is emptied completely before refilling.
- Carrying out temperature checks in accordance with Section 6 of this plan.
- Using the quarantine area in accordance with the Fire Procedure **(SKE-SOP-04).**

9. Quarantine area

Quarantine area location and size

The designated quarantine area is shown on the Whole Site Layout Plan. It is a concrete bay outside any buildings or covered areas and away from combustible material storage areas with dimensions 6m deep x 12m wide and 3m high, which allows for the storage of 216m^3 of material. The wet paper sludge stockpile is 96m^3 maximum and therefore it can be demonstrated that the quarantine bay is adequately sized as can take 200% of the largest waste pile (guidance stipulates at least 50%).

How to use the quarantine area if there is a fire

If safe to do so, in the case of a fire any burning or smouldering material will be moved to the quarantine area as soon as practically possible using the telehandler before supressing using the submersible pump and hose whilst waiting for the attendance of the Fire and Rescue Service in accordance with the Fire Procedure **(SKE-SOP-04).**

Procedure to remove material stored temporarily if there is a fire

This section does not apply as this bay will be kept permanently empty for use as a quarantine bay.

10. Detecting fires

Detection systems in use

There is no fire detection proposed due to the following control measures being in place:

- The site owner who is the Site Manager lives on site and checks the site at 10pm Monday to Saturday inclusive. If the Site Manager is away then his brother checks the site and who lives 500m from the site entrance.
- The Site is covered by 16 no. CCTV cameras linked to the Operators mobile phone. The location of the CCTV cameras is shown on the Whole Site Layout Plan (Appendix A).
- The other control measures detailed within this FPP.
- The biomass boilers have fire prevention built in and can be shut down by the operator via mobile phone remotely.

Certification for the systems

This section is not applicable as there is no fire detection in place.

11. Suppressing fires

Overview

The suppression measures detailed in this section are to be used in the instance of a fire until Cumbria Fire and Rescue Service are in attendance at the site. Site Operatives will only attempt to extinguish fires if safe to do so.

An integrated fire suppression system is not deemed to be proportionate to the risk. The risk will be controlled though fire detection as per Section 10 above, the suppression measures described below and the implementation of the Fire Procedure **(SKE-SOP-04).**

All suppression equipment detailed below is marked on plan the Whole Site Layout Plan (see Appendix A - Site Plans).

Fire Extinguishers

The fire extinguishers on site are of two types; 7 No. carbon dioxide extinguishers for electrical fires and 9 No. foam fire extinguishers for flammable liquid fires.

All fire extinguishers are serviced annually under contract by Beacon Fire Protection Limited.

Water Suppression

There are 2 No. 7,000 litre water tanks on site, their location is shown on the Whole Site Layout Plan. There is 500m of hose that will connect to the tank(s). In addition there is a clay lined lagoon on site (25m wide by 66m long and 2m deep) which has the capacity of 3,300m^3. There are 2 submersible pumps and 200m of hose on site at all times which can be used to draw water out of the clay lined lagoon for additional water supplies. There is also a vacuum tanker. The lagoon is adjacent to the waste storage and treatment areas. Water will be used to supress any fire until the Fire and Rescue Service arrive on site.

Certification for the systems

This section is not applicable as there is no form of certification for the type of fire suppression proposed.

12. Firefighting techniques

Overview

Trained staff may tackle small fires using the on-site fire extinguishers and may use water supplies to suppress fires until the Fire and Rescue Service are in attendance.

As such appropriate firefighting techniques will be determined by the Fire and Rescue Service.

Protecting the health and safety of people on site will always be the priority.

Fire Limitation

The first priority is separation of unburned material from the fire using the telehandler to restrict the extent of spread. If it is safe to do so, burning or smouldering material can be moved into the quarantine area for extinguishment with water. This will only be carried out by staff who are suitably trained and are supervised by the Fire and Rescue Service.

Water

The application of water may be useful to extinguish fires and cool unburned material in full consultation with the Fire and Rescue Service.

13. Water supplies

Available water supply

There are 2 No. 7,000 litre water tanks on site, their location is shown on the Whole Site Layout Plan. In addition there is a clay lined lagoon on site (25m wide by 66m long and 2m deep) which has the capacity of 3,300m^3. There are 2 submersible pumps and 200m of hose on site at all times which can be used to draw water out of the clay lined lagoon for additional water supplies. There is also a vacuum tanker. The lagoon is directly adjacent to the waste storage and treatment areas. The lagoon level may be lower in summer months (estimated 1,650 m^3 minimum).

There are no fire hydrants within 100m of the site.

Show the calculation for your required water supply

In accordance with EA Guidance a 300m^3 pile of combustible material will normally require a water supply of at least 2,000 litres a minute for a minimum of 3 hours = 360,000 litres.

The largest waste pile is 182 m^3.

2,000 litres per minute / 300 m^3 = 6.67 litres per minute /m^3

182 m^3 x 6.67 = 1,214 litres per minute

Therefore the minimum requirement is 1,214 litres per minute for 3 hours (180 mins) which is equivalent to 218,520 litres or 219 m^3.

Table 4: Water Supplies

Maximum pile volume in cubic metres	Water supply needed in litres per minute	Overall water supply needed over 3 hours in m^3	Total water available on site in m^3
182	1,214	219	14 in tanks 1,650 in lagoon (minimum) 1,650 total

It can therefore be confirmed that there is an adequate water supply on site to extinguish a fire in the largest waste pile with significant contingency.

14. Managing fire water

Containing the run-off from fire water

The run-off from firefighting will be contained to prevent pollution of the environment.

The wet paper sludge storage area drains to a sump which is pumped out into a container and removed off-site for treatment i.e. a sealed drainage system. The dried paper storage bays benefit from an impermeable surface; there is no risk of polluting runoff from these areas during normal operations.

The whole site drains to the adjacent clay lined lagoon. In accordance with the Fire Procedure **(SKE-SOP-04)** the outlet will be sealed off in the instance of a fire and the lagoon used as both a water source and a containment system. The contents of the lagoon would be tankered off-site for treatment as a waste in the case that there had been a fire on site and polluted water had entered the lagoon.

15. During and after an incident

Dealing with issues during a fire

No waste will be accepted on to site during a fire and this activity will only continue following approval from the Environment Agency.

The operator will ensure that no further waste loads are accepted for treatment in the case of any accident that may cause pollution of the environment including fires.

The Operator is not tied into a contract with the waste broker and can stop waste acceptance at any time.

Notifying residents and businesses

Nearby residents and businesses will be notified in the case of a fire in accordance with the Fire Procedure **(SKE-SOP-04).**

Clearing and decontamination after a fire

The required actions in relation to any clearance and decontamination of the site after a fire will obviously be dependent on the scale of any fire. Protection of the environment, specifically surface water receptors will be prioritised and the clean-up operation will be carried out in full consultation with the Environment Agency. Permitted activities will not re-commence without Environment Agency approval.

1. Following a fire, personnel will only be instructed to re-enter the site when it is safe to do so as directed by the attending Fire and Rescue Service.
2. Where the fire has compromised the ability of the operation to continue, the Site Manager will contact the waste broker in order to prevent incoming waste to the site.
3. Once deemed safe to do so the site will be inspected to identify specific hazards including any contaminated materials.
4. Specialist advice will be sought from an emergency response company. Their services will be sought with regards to disposal of fire water during and after the event.
5. A risk assessment and site investigation will be undertaken to determine the extent of the contamination. This will inform the proposed remediation strategy. The Environment Agency will be consulted about this prior to work being carried out.
6. All combusted or partially combusted material and any other contaminated waste shall be removed using a registered waste carrier to permitted waste management sites.
7. The site will be cleared progressively in consultation with the Environment Agency. The Environment Agency will be notified of all actions. Duty of care records will be maintained.
8. Contaminated fire water from on-site containment areas/ systems will be removed by a vacuum tanker. Specialist advice will be sought from the nominated emergency response

company. Their services will be sought with regards to disposal of fire water during and after the event.

9. The cause of the fire will be investigated to ensure that it does not reoccur.
10. The Environmental Management System including the Fire Procedure **(SKE-SOP-04)** and the Fire Prevention Plan **(SKE-OD-02)** will be reviewed to identify where improvements may be required.
11. The Fire and Rescue Service will be consulted with regards to what further fire reduction measures may be required and any new measures and procedures will be implemented. The provision and content of staff training will also be reviewed.

Making the site operational after a fire

As above.

Appendix A - Site Plans

Site Location Plan (SPC0130/LocationPlan/Rev A)

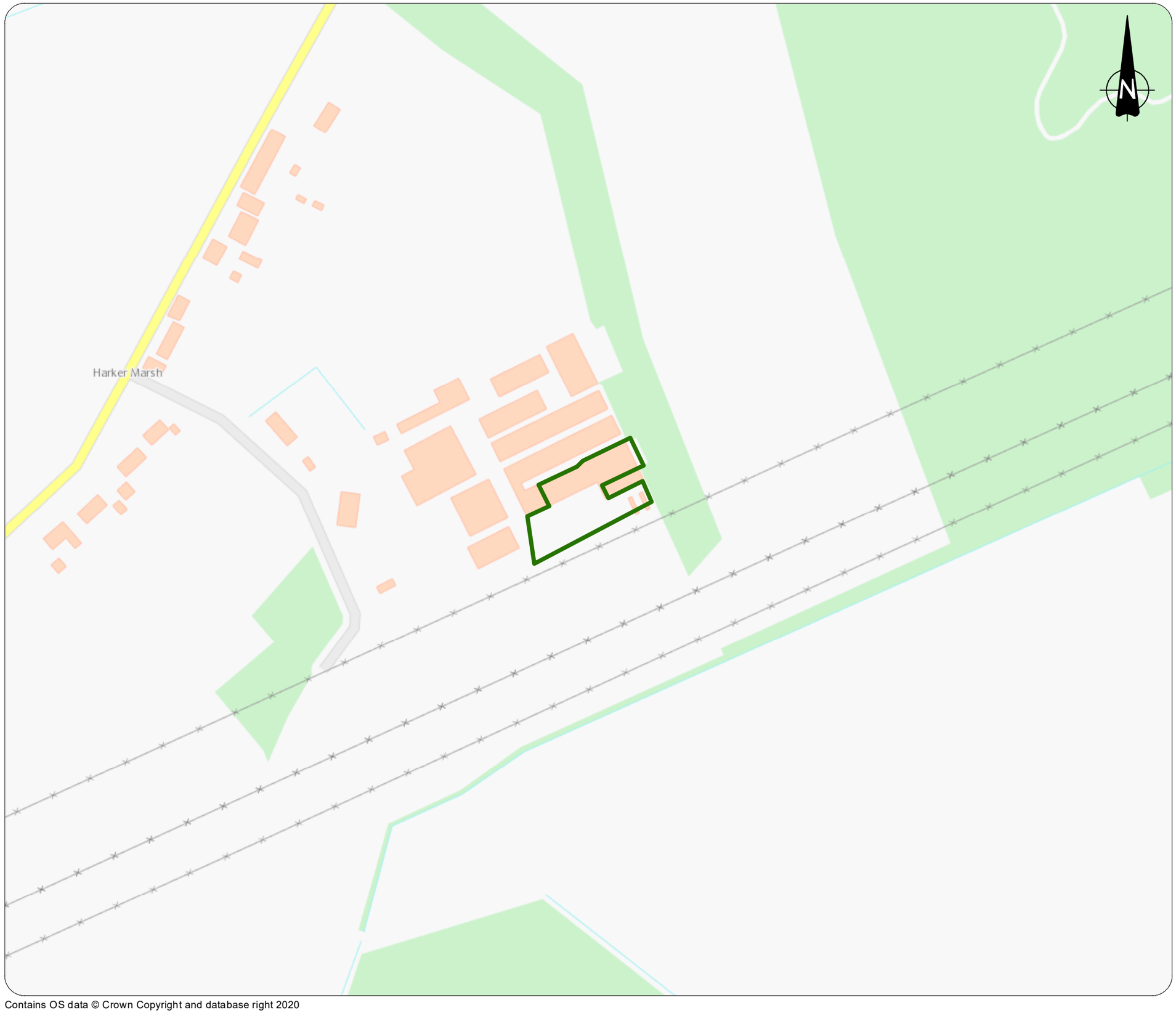
Permitted Boundary Plan (SPC0130/BoundaryPlan/Rev A)

Human Receptor (1km) Plan (SPC0130/HumanReceptor(1km)/Rev A)

Whole Site Layout Plan, V1.0, May 2024 (Fire suppression & CCTV locations)

Emergency Plan (EV10) (Site access, assembly points & emergency shutdown switch location)

Paper Drying Layout Plan V1.0, May 2024



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

Permit Boundary

0 50 100 m

Scale at A3: 1:2,500

Client
Robert Skelton Contractors Limited

Project
New Hall Farm Paper Drying Plant Permit Application

Title
Site Location Plan

SHANN PITTS CONSULTING

Westbrook Farm
Westbrook
Gillingham
Dorset SP8 5DT

Tel: 07866024096

emily@shannpittsconsulting.co.uk
www.shannpittsconsulting.co.uk

Drawn	Checked	Approved	Revision
JS	ESP	ESP	A

Date	Scale	Sheet Size
May 2024	1:2,500	A3

Drawing Number	File Reference
SPC0130/LocationPlan/Rev A	SPC130.mxd

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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

Permit Boundary

0 10 20 m

Scale at A3: 1:500

Client
Robert Skelton Contractors Limited

Project
New Hall Farm Paper Drying Plant Permit Application

Title
Permitted Boundary Plan

SHANN PITTS CONSULTING

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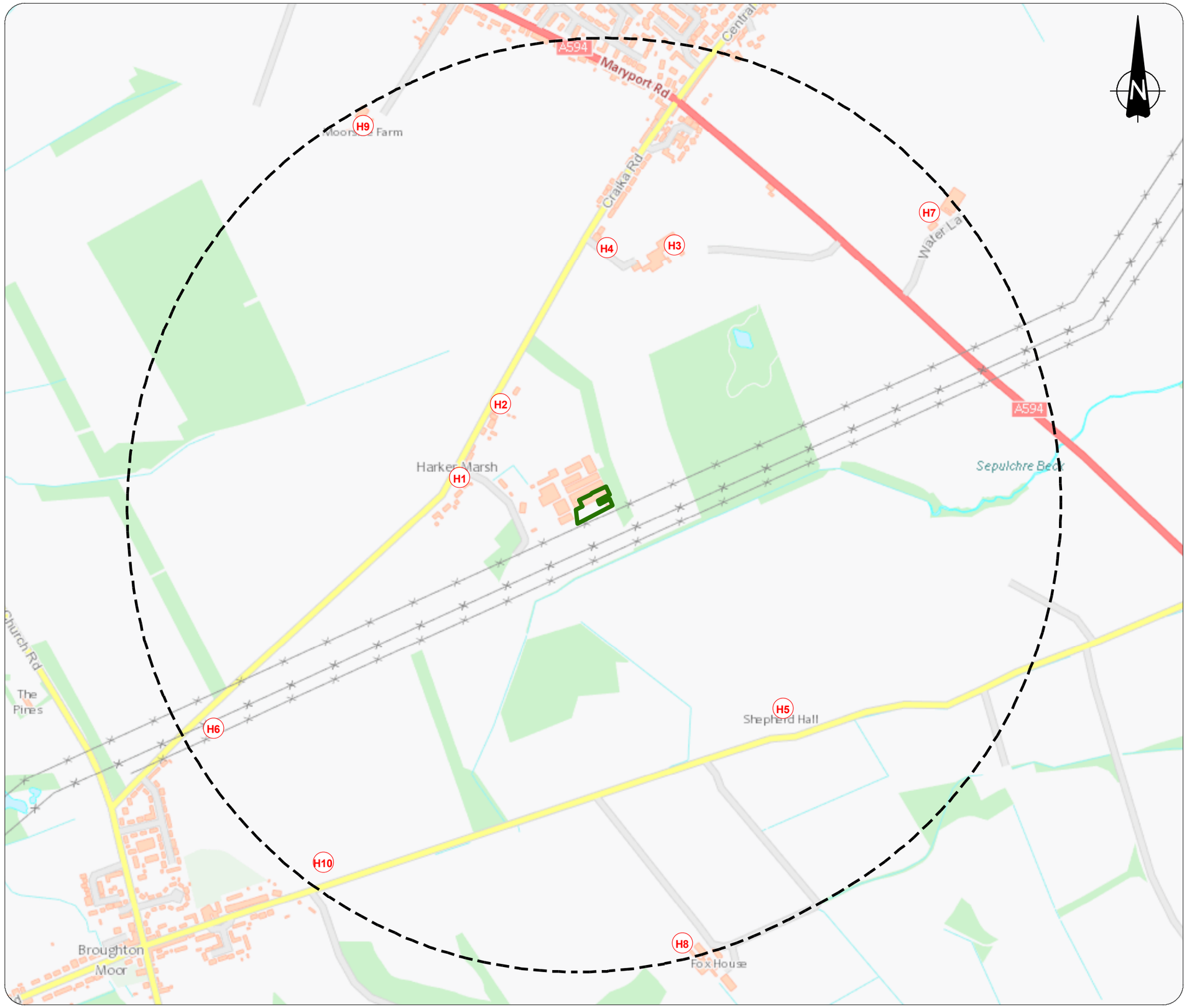
Drawn	Checked	Approved	Revision
JS	ESP	ESP	A

Date	Scale	Sheet Size
May 2024	1:500	A3

Drawing Number	File Reference
SPC0130/BoundaryPlan/Rev A	SPC130.mxd



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

- Permit Boundary
- Permit Boundary 1km Buffer
- (H) Human Receptor

0 100 200 300 400 m

Scale at A3: 1:8,500

Client: Robert Skelton Contractors Limited

Project: New Hall Farm Paper Drying Plant Permit Application

Title: Human Receptors Plan

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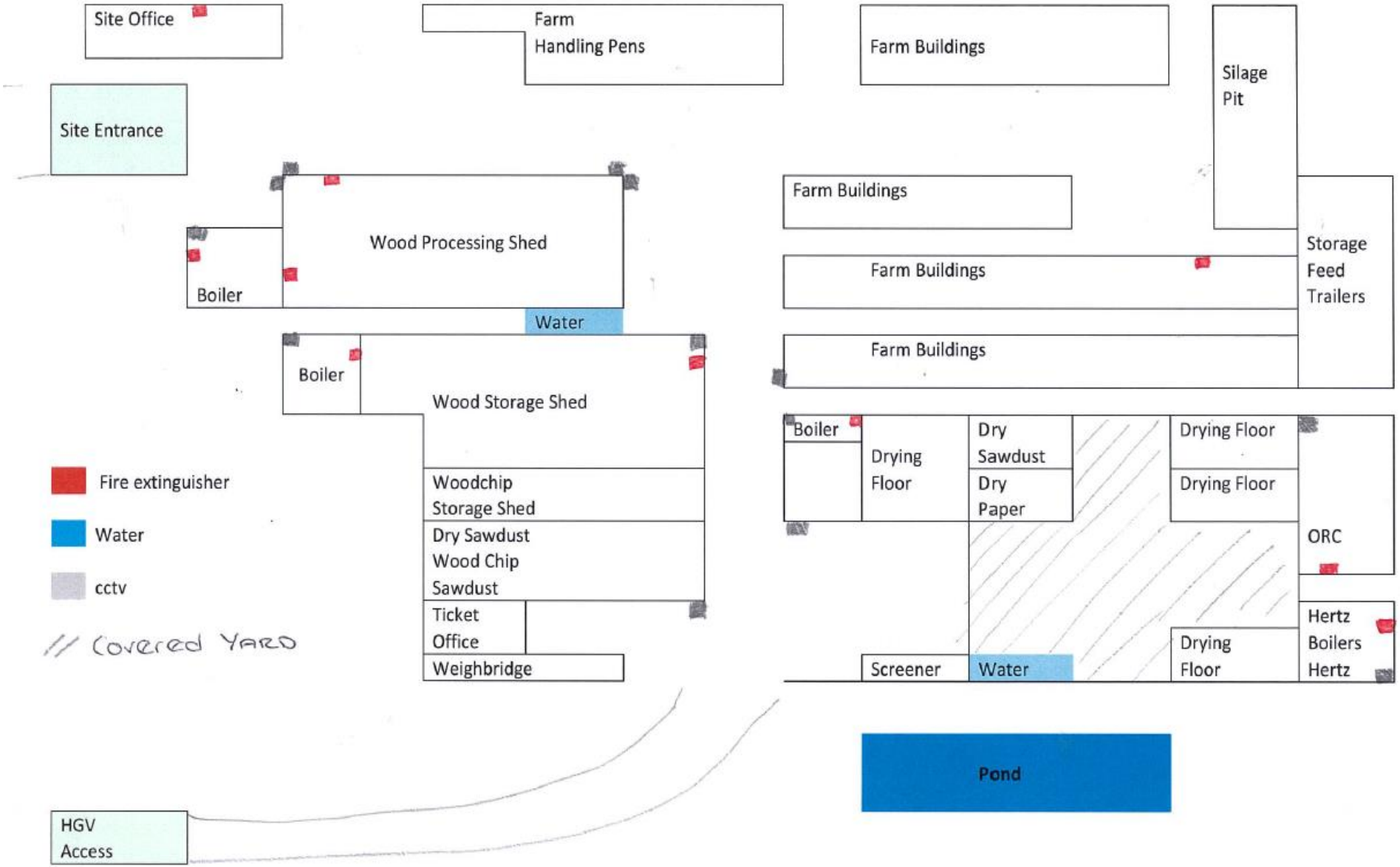
Drawn	Checked	Approved	Revision
JS	ESP	ESP	A

Date	Scale	Sheet Size
May 2024	1:8,500	A3

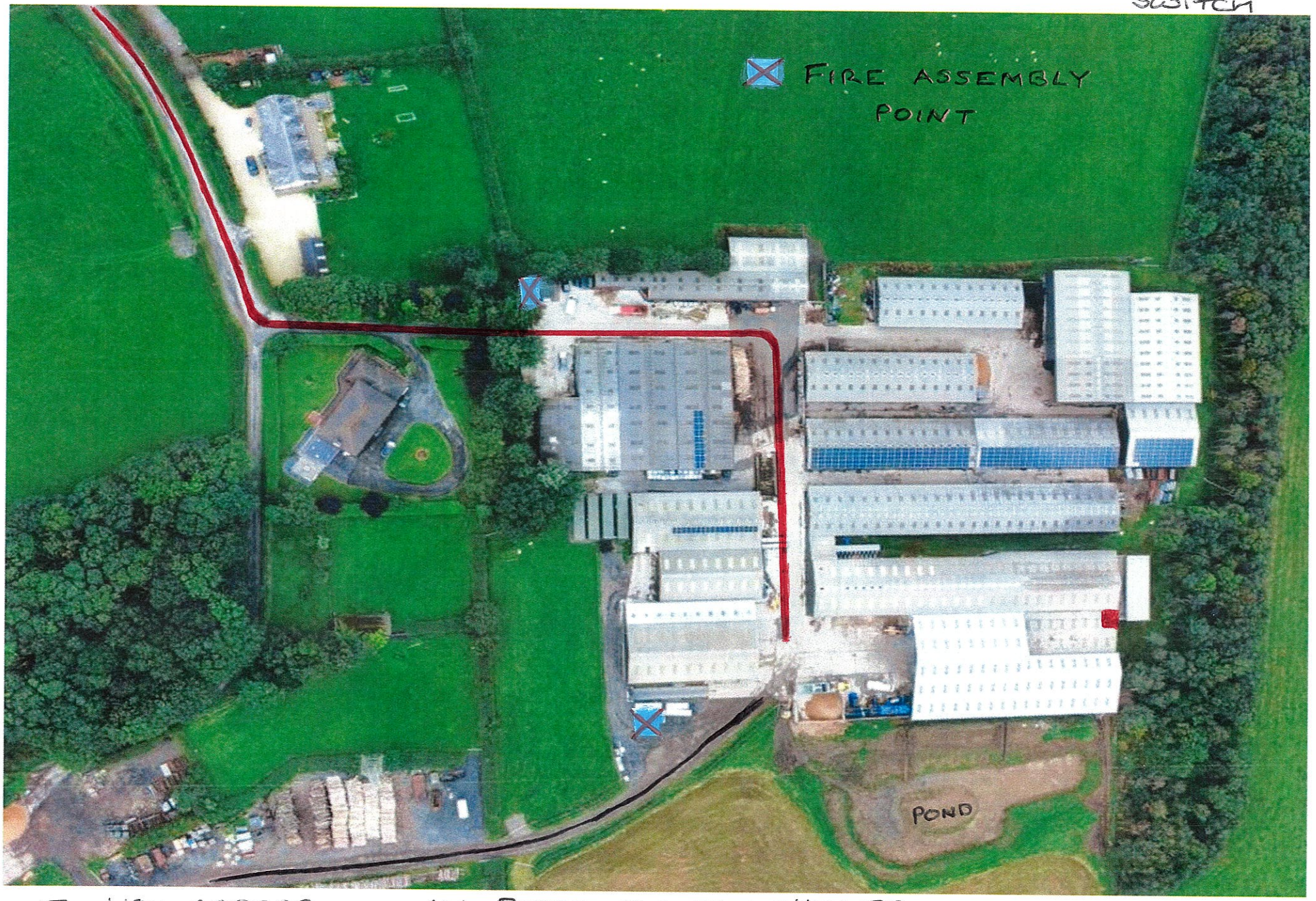
Drawing Number	File Reference
SPC0130HumanReceptor(1km)Rev A	SPC130.mxd

New Hall Farm Paper Drying Plant – Whole Site Layout Plan, V1.0, May 2024



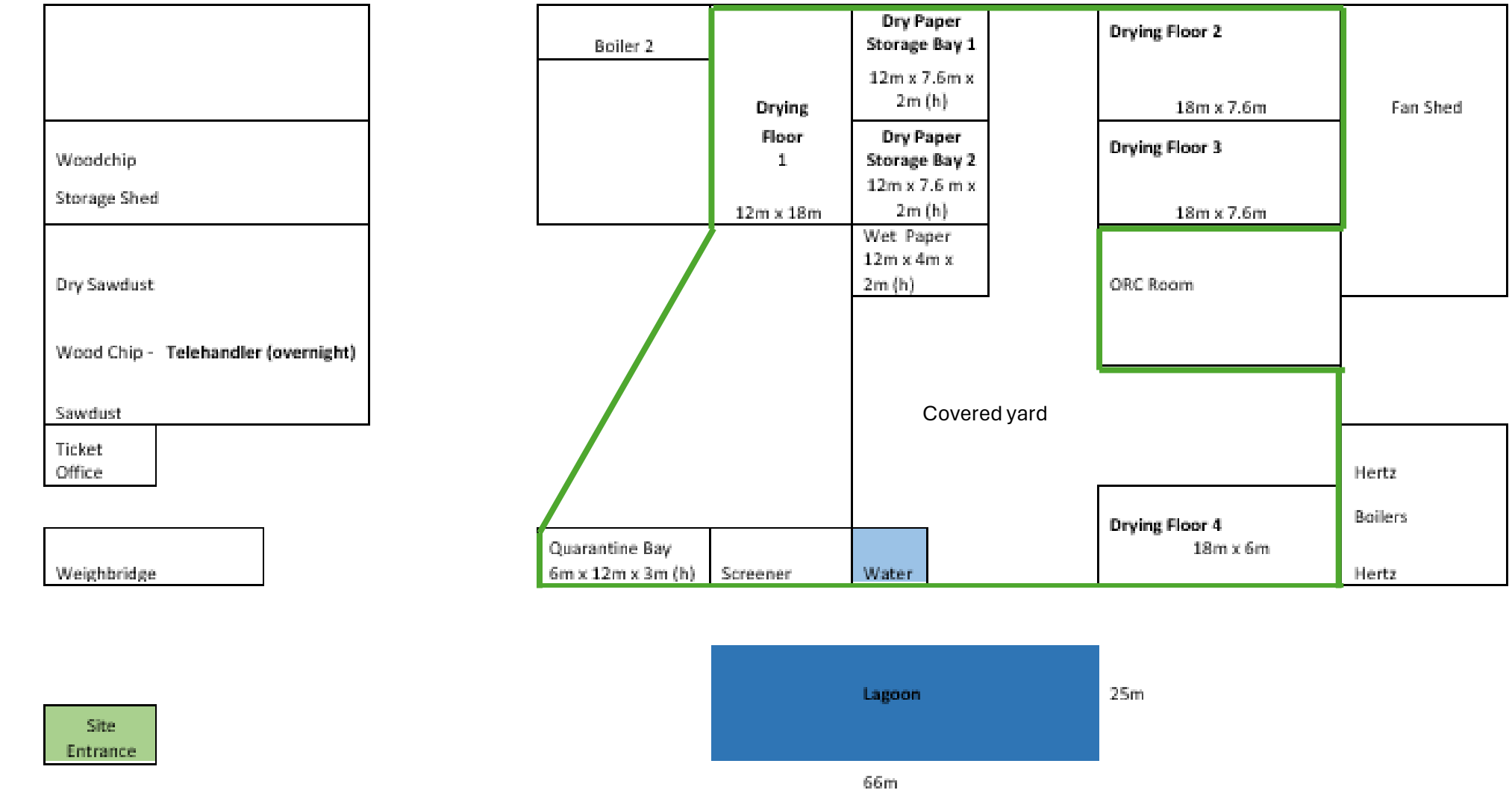
- EMERGENCY SERVICES ENTRANCE FROM SUNNYSLACK

SITE SHUT DOWN SWITCH



HGV ACCESS - ALL PAPER PLANT VEHICLES

New Hall Farm Paper Drying Plant - Paper Layout Plan, V1.0, May 2024



Appendix B – Concrete Specification for Storage Bays & Drying Floors

ATLAS CONCRETE LIMITED
PRE · STRESSED CONCRETE SPECIALISTS

Solway House

Silloth Industrial Estate

Silloth, Cumbria, CA7 4NS

Tel: 016973 32585

www.atlasconcrete.co.uk

DESIGN DATA SHEET

PANEL TYPE H180

Data sheet for concrete panels to BS 8110: 1997

Unit Properties per 1000m width

Depth = 180mm Width = 1500mm (1000mm, 1200mm available)

Concrete Data

Characteristic strength = 60N/mm^2 At Transfer = 30N/mm^2

Reinforcing Data

12 nos 9.3mm dia strands (27.7mm top cover) Fpu = 1770 N/mm^2

6 nos 9.3mm dia strands (122.3mm top cover) Fpu = 1770 N/mm^2

BS5896/1980 Strand/Wire – Relax 2 – Prestress = 70% UTS

Serviceability State

Service capacity per m 73.0 kN-m

Ultimate State

Unit ultimate state performance per m 85.4 kN-m

Joint shear load capacity 254 kN

General

Fire Rating = 2.0 hrs Self Weight 441 kg/m^2