



Max Recycle UK Ltd

Fire Prevention Plan

Hawthorne House, Blackthorn Way, Sedgeleth Industrial Estate, Fencehouses, Tyne and Wear
DH4 6JW

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Basis of Report

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1.0 Introduction

1.1 Report Context

On behalf of Max Recycle UK Ltd, Advetec Holdings Limited (Advetec) has instructed SLR Consulting Limited (SLR) to prepare a Fire Prevention Plan (FPP) for the Max Recycle Waste Transfer Station (WTS), Hawthorne House, Blackthorn Way, Sedgeleth Industrial Estate, Fencehouses, Tyne and Wear, DH4 6JW.

The site currently operates under a standard rules 2008 No3 Environmental Permit (EP) (Ref: EPR/BP3590VJ). Max Recycle have applied to vary the site's EP to become a bespoke EP however (EPR/BP3590VJ/V003).

This report follows the Environment Agency (EA) guidance for Fire Prevention Plans (FPPs)¹ and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

The information contained within this FPP aims to meet the 3 main objectives of the EA FPP Guidance:

- Minimise the likelihood of a fire happening;
- Aim for a fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the site and to neighbouring sites.

Under current fire safety legislation, a responsible person must carry out, or appoint a competent person to carry out, a suitable and sufficient fire risk assessment of the risks of fire to employees and others who may be affected by the site. A Fire Risk Assessment was carried out 8th December 2023 (Ref: Fire Risk Assessment – Max Recycling Dec 2023).

1.1.1 Current EP

The site operates as a household, commercial and industrial waste transfer station with treatment under a standard rules 2008 no 3 EP (Ref: EPR/BP3590VJ). The EP was originally issued in April 2009. In December 2018, it was varied to extend the site boundary.

2.0 Types of Combustible Material

2.1 Combustible Waste

The site is permitted to accept up to 75,000 tonnes per annum (tpa) of household, commercial and industrial waste. Max Recycle provide waste management services for private commercial and industrial business.

The only limitation on the maximum amount of waste which can be stored on site at any one time stipulated in the site's EP is for intact and shredded tyres (50 tonnes).

In practice, storage of combustible waste on site is limited by the capacity of the bays located within the WTS building and a roll-on roll-off skip kept externally and used for storage of floc material from the Advetec unit. There are three waste storage bays, the largest of which has a capacity of 114m³. The RORO skip has a capacity of 31m³.

The site's layout is illustrated on Drawing FPP1.

¹ [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/fire-prevention-plans-environmental-permits)



The EP allows for the following waste types to be accepted on site which are defined as ‘combustible materials’ in the EA’s FPP Guidance:

- Mixed municipal, biodegradable waste;
- Food waste;
- Metal;
- Waste Electrical and Electronic Equipment (WEEE) (including TV’s and monitors);
- Alkaline acid (car) and other battery types and accumulators;
- Wood;
- Green waste;
- Gypsum-based construction materials;
- End-of-life tyres;
- Paper and cardboard;
- Textiles;
- Plastics.

The full waste list is detailed in Table S2.2 of the site’s EP.

2.2 Persistent Organic Pollutants (POPs)

The Site does not accept materials containing POPs at the Site. For example, while the Site is permitted to accept WEEE, it does not in practice and would reject WEEE delivered to Site. Therefore, this section does not apply.

2.3 Other Combustible Materials

The site stores non-waste materials that are not covered by the FPP Guidance but are considered in this FPP due to the potential for them to cause or increase the impact of a fire on the site. The materials and their storage arrangements are shown in Table 2-1 below, and illustrated on Drawing FPP1.

Table 2-1 Non-Waste Materials: Storage Arrangements

Type	Storage Location	Storage Arrangement
Heating Oil Tank	In waste transfer station building	500 litre double skinned plastic tank.
Cleaning products	Locked in secure cupboard	Chemicals provided with secondary containment.

3.0 Using this FPP

3.1 Where the Plan is Kept and Do Staff Know How to Use it

A copy of this FPP is kept within the site office and adjacent to Site’s fire alarm panel with the Fire Plan.

All staff will be made aware of the contents of the FPP and the procedures that are in place in the event of a fire on site during their induction and through periodic refresher training. Max Recycle will conduct regular Toolbox Talks, and safety days/fire drills. Contractors,



visitors, and drivers working on site will be made aware as part of on-site working procedures, during their site induction. This will ensure that all staff and contractors working on site know what they must do:

- To prevent a fire happening; and
- During a fire if one breaks out.

3.2 Testing the Plan and Staff Training

3.2.1 Staff Training and Procedures

All staff will receive training in the use and selection of fire extinguishers, site evacuation, fire safety and all relevant emergency procedures, in addition to training according to their individual duties. This training will be refreshed annually, and in the event of a fire or any changes to the FPP to ensure the site operatives have up to date knowledge of procedural expectations.

All staff and contractors working on site will be made aware of the contents of the FPP and the procedures that are in place in the event of a fire on site during their induction. The staff training will be regularly refreshed, as a minimum on an annual basis, or in the event of non-compliance or change to the operations on site which affect fire risk and management.

Key personnel have been trained as Fire Wardens by an external body and drivers are trained in the use of fire extinguishers as part of their ADR training.

The procedures for fires discovered on site are provided both in the site's Fire Risk Assessment and on-site notice boards.

Max Recycle will review the FPP once a year, or in the event of any significant changes to site operations, to ensure that the contents are still relevant and that all staff members' knowledge is current and up to date.

3.2.2 Testing the FPP

The FPP will be implemented across the site and all fire management equipment will be maintained in line with schedules set by Max Recycle.

In accordance with the fire risk assessment, testing of the fire evacuation plan and associated fire management duties (fire drill) is carried out at least once every 6 months. Evacuation exercises are also conducted following significant changes to the site operation or following an incident or near miss that might impact on the FPP.

If any issues are identified, the FPP will be updated or amended accordingly, and site operatives will be retrained.

Regular checks are made of all escape routes and equipment.

The FPP is kept under regular review and revised where necessary, for example if:

- There is a reason to suspect it no longer meets the objectives of the EA's FPP guidance;
- The site has a fire or identifies a near miss of a fire;
- On site activities/operations are changed;
- The environment surrounding the site changes; or
- The EA ask Max Recycle to revise the FPP due to concern over the risk posed by on site operations.



If the FPP is revised, a copy will be sent to the EA for approval.

4.0 FPP Contents

4.1 Activities at the Site

The site is permitted to accept up to 75,000 tonnes per annum (tpa) of household, commercial and industrial waste. Max Recycle provide waste management services for private commercial and industrial business.

Treatment activities permitted to be undertaken at the site include manual sorting, separation, screening, baling, shredding, crushing or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.

Following the variation application, the permit will also allow treatment of up to 10 tonnes per day of residual municipal waste (20 03 01) by aerobic digestion.

4.1.1 Specified Waste Management Activities

The activities carried out at the site as defined under Annex II of the Waste Directive Framework can be summarised as follows:

- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced);
- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced);
- D14: Repackaging prior to submission to any of the operations numbered D1 to 13;
- D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12;
- R3: Recycling/reclamation of organic substances which are not used as solvents;
- R4: Recycling/reclamation of metals and metal compounds;
- R5: Recycling/reclamation of other inorganic materials; and
- R12: Exchange of wastes for submission to any of the operations numbered R1 to R11.

4.2 Site Plan

The Site is located within Max Recycle, Blackthorn Way, Sedgeleth Industrial Estate, Fencehouses, Tyne and Wear, DH4 6JW, centred on National Grid Reference (NGR) NZ 32115 50546. The village of Houghton Le Spring is located 2.3km southeast and the City of Sunderland lies 10km to the northeast. The Site Layout Plan and EP Boundary is illustrated on Drawing 001 and Drawing 002.

4.3 Plan of Sensitive Receptors Near the Site

The surrounding land-use and receptors are identified on Drawing 003.

The site is surrounded by open land, industrial and residential land uses.

Table 4-1 below summarises the surrounding land uses.



Table 4-1 Surrounding Land Use

Boundary	Description
North	Moors Burn and open ground (Elba Park), with residential properties situated beyond this
East	Industrial / commercial premises include a timber engineering facility and residential properties
South	Commercial/industrial properties with residential properties beyond
West	Open ground (Elba Park)

The immediate surrounding land use is described in further detail below.

4.3.1 Residential properties

The closest residential properties are located adjacent to the east of the site.

4.3.2 Industrial and Commercial Premises

Industrial premises lie adjacent to the south and east. Fencehouse Timber Engineering lies to the east of the site. The Sedgelethch Waste Water Treatment Works (WWTW) operated by Northumbrian Water lies approximately 215m to the northeast of the site. Dubmire Industrial Estate is located approximately 320m to the southeast of the site.

4.3.3 Agriculture and Areas of Open Space

Areas of open space lie immediately to the north and west of the site.

4.3.4 Educational premises

There are a number of schools situated within 1km of the site as follows:

- Dubmire Primary School – 625m to the south
- Woodlea Primary School - 735m to the west.

4.3.5 Nursing / Care Homes

Lambton House Care Home is located approximately 410m to the northwest of the site.

4.3.6 Recreational premises

There are a number of recreational premises located within 1km of the site. The closest of these is a football pitch located approximately 390m to the southwest of the site.

4.3.7 Major Roads

The A1052 is located approximately 405m to the southwest of the site.

4.3.8 Railways

The railway line running between Washington and Sherburn is situated approximately 290m to the west of the site.

4.3.9 Hydrology

There are a number of surface water features within a 1km radius of the site boundary. The closest of these is Moors Burn which is situated approximately 15m north of the site.



4.4 Ecology

4.4.1 European/International Sites

Searches on the Multi-Agency Geographic Information for the Countryside (MAGIC)² website confirm that there are no Special Areas of Conservation (SAC), RAMSAR sites, Sites of Special Scientific Interest (SSSI) or Special Protection Areas (SPA) sites within 1km of the permit boundary.

4.4.2 Ancient Woodland

There are two areas of ancient woodland located within a 1km radius of the site. The nearest area of ancient woodland, known as Fencehouses Wood is located approximately 540m to the southwest of the site. Another area of ancient woodland, Lumley Park Wood is located 1km to the west of the site.

4.4.3 Other ecological receptors

Searches on the MAGIC¹ website confirm there are none of the following ecological receptors within 1km of the EP boundary:

- Local Nature Reserves;
- National Nature Reserves;
- Areas of Outstanding Natural Beauty;
- Registered Parks and Gardens;
- World Heritage Sites; and
- Woodland Trust Sites.

4.4.4 Cultural Heritage

Searches on the MAGIC¹ website confirm that there are none of the following within 1km of the site boundary:

- National Trust Properties;
- Registered Battlefields;
- Scheduled monuments.

There are three Listed Buildings within a 1km radius of the site. The closest of these is the Fence Houses War Memorial including wall, piers and railings approximately 545m to the southwest of the site.

Further to the southwest of the site, within the wider 1km radius from the site, are Morton House (935m) and Ice House to North of Morton House (930m).

4.5 Receptors

Table 4-2 and Drawing 003 show the locations of receptors that are considered to be potentially sensitive and could reasonably be affected by the waste management activities.

² www.magic.gov.uk accessed January 2024.



Table 4-2: Identified Receptors

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from site boundary (at nearest point)
Identified receptors within 1km of the EP Boundary as shown on Drawing 003			
Residential properties	Residential	East & South	Adjacent
Sedgeleth Industrial Estate	Industrial Premises	East & South	Adjacent
Elba Park	Recreational / Open Land	North & West	Adjacent
Moors Burn	Surface Water Feature	North	15m
Sedgeleth WWTW	Industrial / Commercial	Northeast	215m
Railway Line	Railway	West	290m
Dubmire Industrial Estate	Industrial / Commercial	East	320m
Football pitch	Recreational	Southwest	390m
A1052	Major Road	Southwest	430m
Lambton House Care Home	Care / Nursing Home	Northwest	410m
Allotments	Recreational	Southwest	470m
Fencehouses Wood	Ancient Woodland	Southwest	445m
Fence Houses War Memorial	Listed Building	Southwest	540m
Dubmire Primary School	Educational Premises	South	625m
Woodlea Primary School	Educational Premises	Southwest	735m
Ice House to North of Morton House	Listed Building	Southwest	930m
Morton House	Listed Building	Southwest	935m
Lumley Park Wood	Ancient Woodland	West	1km



4.6 Windrose

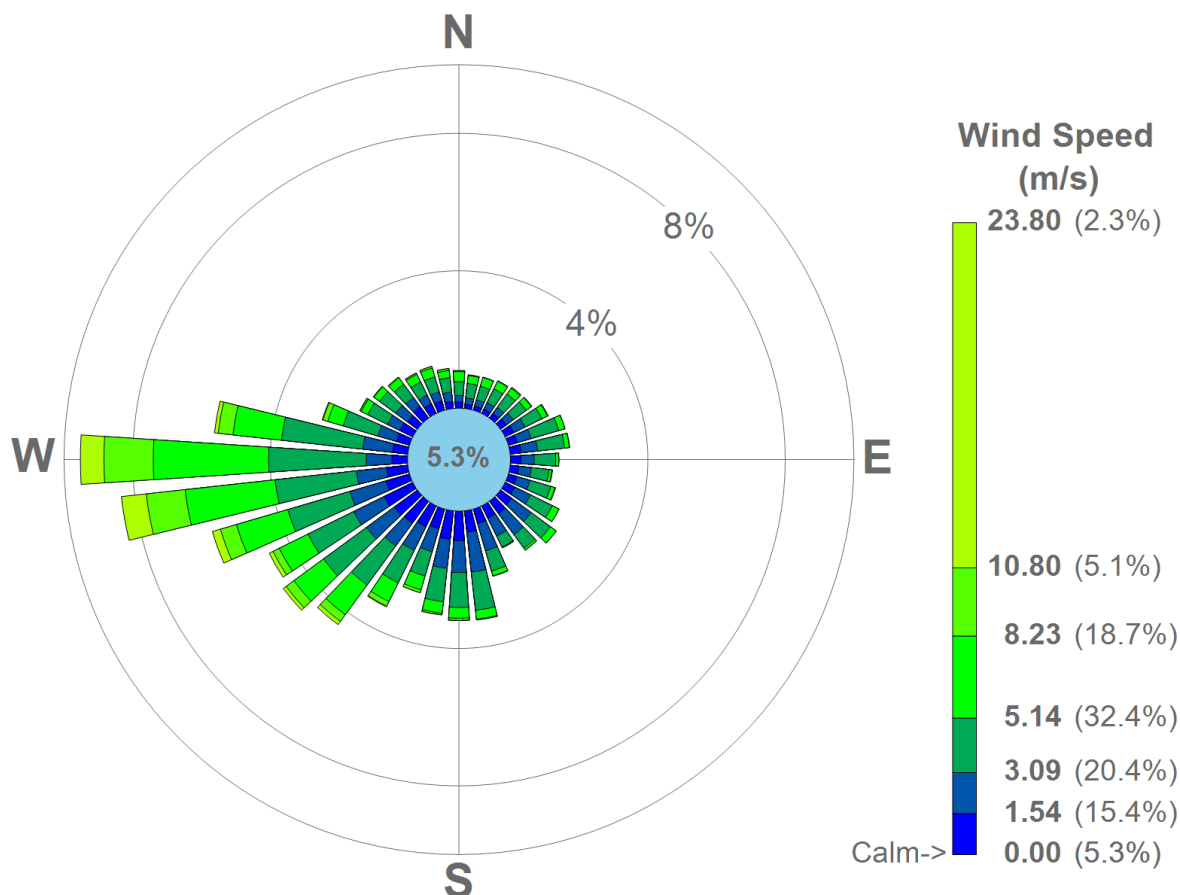


Figure 4-1 Windrose – Newcastle Met Station 2014-2017

5.0 Manage Common Causes of Fire

5.1 Arson

The site benefits from the following security measures in place to limit the likelihood of arson or vandalism:

- The site is surrounded on all sides by a perimeter fence;
- All access points benefit from lockable steel gates, which are kept locked when the site is closed, and unattended;
- The main offices are fitted with an intruder alarm. If the alarm were to be activated, the security company would be alerted;
- Comprehensive lighting system to illuminate the site during the night;
- CCTV cameras covering site and building; and
- Inspection and maintenance procedures.

All visitors to the site are required to report to the site office, and register in the site diary. This will minimise the risk of unauthorised visitors being present on site.



The WTS is operational Monday to Friday 6am to 6pm. The Advetec unit will operate 24 hours / seven days a week.

CCTV covers operational areas and is monitored regularly by site operatives during operational hours. If a breach in security is detected site operatives/the security patrol would contact the Site Manager and the emergency services as appropriate, both inside and outside of operational hours.

The gates, fencing, and lighting are inspected daily by the Site Manager or a nominated deputy, to assess their continued integrity. If necessary, and as a minimum, temporary repairs will be carried out to fences and gates before the end of the working day to ensure that the site remains secure. Full repair or replacement as necessary will be affected within seven working days of the damage being detected. The findings of the security checks, the details of any works necessary to remedy failings and the date of their completion will be recorded.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded. Records maintained will include inspections and maintenance of doors and locks, breaches of security, investigations and actions taken.

5.2 Plant and Equipment

Plant and equipment are maintained in accordance with the manufacturer's recommendations and instruction manuals. Instruction manuals for plant and equipment are held either on site or online if a hardcopy is not available from the manufacturer.

Planned plant and equipment maintenance is scheduled and carried out by Max Recycle's in house fleet and garage team or supply chain partners to ensure that all plant and equipment remains fully operational.

Induction training and refresher training is provided to staff in the safe operation of plant and equipment relevant to their role, in accordance with site procedures.

The Site Manager ensures that inspection of plant and equipment is undertaken on a daily basis by the vehicle operator, to check for faults and ensure that appropriate safeguards are in place. Inspections are recorded on the daily inspection sheets, held within each of the vehicles. The Site Manager also ensures that general housekeeping and cleaning of plant and all equipment on site is carried out regularly. In addition, plant and equipment will be visually inspected prior to every use to ensure it is fit for purpose.

In the event of a failure or suspected fault with an item of plant or piece of equipment, the operator will ensure that the equipment is shut off in a safe manner, removed from service and placed outside of the WTS building until either the Site Manager authorises its reuse or the authorised repairer confirms it is fit to use.

Storage of mobile plant is detailed in Section 5.2.1 below. All mobile plant vehicles on site are fitted with fire extinguishers.

5.2.1 Mobile Plant

The following items of mobile plant are held on site:

- Liebherr 554 wheeled loading shovel;
- JCB TM300 Telehandler;
- Doosan DX63 360 excavator; and
- Orwak baler.



All of the above are stored outside of the plant when not in use or at the opposite end of the waste reception hall, 6 metres from stockpiled waste as illustrated on Drawing FPP1.

5.2.2 Fixed Equipment

The following items of fixed equipment are held on site:

- Feed hopper for Advetec unit;
- RS50 shredder;
- Advetec XO22 unit;
- Feed hopper for trommel;
- Trommel screen;
- Conveyor; and
- Compactor.

In summary, the following provisions are implemented:

- Plant maintenance schedules using the manufacturer's recommendations;
- Pre-use checks prior to using any plant or equipment;
- Reporting of defects and actions taken based on priorities;
- Daily cleaning to remove any dust build up from vulnerable areas;
- All fixed equipment are supplied with fire extinguishers; and
- Fixed equipment is kept away from combustible waste.

5.3 Electrical Faults

5.3.1 Electrics Certification

All electrics on site are fully certified by a qualified electrician and a record of the certification is kept.

All electrics are PAT tested yearly by an approved sub-contractor.

5.3.2 Electrical Equipment Maintenance Arrangements

Max Recycle carry out regular safety inspections of electrical equipment in accordance with the latest version of the IET Code of Practice for In-Service Inspection and Testing of Electrical Equipment and uses a suitably qualified electrician to ensure risks are minimised.

Electrical wiring is tested and inspected every 36 months and circuit completion records are maintained.

Where remedial work and repairs are required Max Recycle use a suitably qualified electrician.

Electrical equipment is visually inspected prior to every use to ensure it is free from obvious damage and fit for purpose.

5.3.3 XO22

All electrics associated with the XO unit are fully certified by a qualified electrician and with written procedures in place that set out the regular maintenance.



Any potential ignition sources from suspected electrical faults should be isolated and Advetec should be contacted immediately to rectify the situation. Where possible, staff should immediately remove any feedstock from the unit and waste in the vicinity if safe to do so.

Max Recycle have a Master Service Agreement contract with Advetec for the undertaking of 3-monthly and annual servicing. Maintenance is undertaken by Advetec in accordance with its recommended maintenance schedule.

5.4 Discarded Smoking Materials

Max Recycle employs a smoke free site. Employees are responsible for ensuring they are familiar with the smoke workplace policy, and a failure to comply may result in disciplinary action. The site is monitored for compliance by Supervisors and Managers, and contractors are made aware of the site rules as part of the induction process.

5.5 Hot Works Safe Working Practices

Max Recycle operates a permit to work system which includes a 60 minute fire watch by a competent person at the end of the works. No hot works are undertaken by staff unless they are trained and the relevant permit to work has been authorised. Before any hot works take place, a point of work risk assessment is carried out to identify hazards including the proximity of combustible materials, and the steps required to mitigate the risk such as moving materials to a safe location, providing protective screens and firefighting equipment.

Any works conducted take place in a cleared area of the site at least 6m from any combustible wastes. A site operative performs a continuous fire watch during the hot work and for a minimum of 60 minutes after the work is completed.

5.6 Industrial Heaters

No portable heaters are utilised on site. The site office is heated via air conditioning units and a heating oil boiler.

5.7 Hot Exhausts and Engine Parts

Vehicles are turned off when not in use and are parked outside or in the mobile plant storage area illustrated on Drawing FPP1, at least 6m away from any combustible materials.

Flammable and combustible materials are stored in the designated areas away from frequent vehicle movements.

Vehicle operatives conduct an inspection of each vehicle twice a day and at the end of each working day and record any findings in the mobile plant defect book. Operatives check the cleanliness of the plant paying particular attention to any build-up of dust or waste around the engine and exhaust. If issues are identified, the equipment operator will remove them immediately by brushing.

5.7.1 Fire Watch Procedures

Consideration is given to the high-risk time for hot exhausts (one hour after switching off when dust can settle on hot surfaces) and wherever possible vehicles are given time to cool down prior to site staff leaving site at the end of a shift. A visual site inspection will be completed at the end of the day.



5.8 Ignition Sources

Potential ignition sources include hot exhausts and engine parts, discarded smoking materials, and hot works (all described above). No waste material will be burned within the EP boundary, and any fire at the site will be treated as a potential emergency and dealt with appropriately.

Ignition sources will be kept a minimum of 6m away from the storage of combustible and flammable wastes.

5.9 Batteries

While the site is permitted to accept, segregate and store waste batteries, in practice, Max Recycle do not accept batteries. If batteries were found within a load, they would be segregated and quarantined for removal off-site to a suitably licensed facility.

Strict waste acceptance procedures are implemented on site to ensure only permitted wastes are accepted and that batteries are not received. Waste undergoes visual inspection at the weighbridge to confirm its description and composition against the relevant accompanying documentation. For waste collected by Max Recycle, crews will visually inspect waste wherever possible as it is collected and, in the event that non-compliant waste or contamination is found then, the waste is not collected and a warning notice is affixed to the bin / skip etc., with a report made to follow up.

At the site, waste is offloaded whilst supervised by suitably qualified site operatives. Staff are briefed to look out for batteries. Should waste batteries be identified within the waste stream during visual inspections they will be removed and quarantined within sealed weatherproof containers with a lid to ensure that they do not come into contact with liquids, or become damaged. If damaged batteries are identified during waste acceptance visual inspections, they will be isolated from other batteries, and quarantined prior to removal from site to an appropriately permitted facility for recovery or disposal.

5.9.1 Batteries in ELVs

The site does not accept ELVs therefore this section is not applicable.

5.10 Leaks and Spillages of Oils and Fuels

Plant and equipment are maintained to a high standard in accordance with the manufacturer's recommendations. All mobile plant is inspected daily to identify potential defects that could lead to a leakage of fuel across the site, and staff are continually reminded to pay particular attention to fuel tanks for signs of leakage. Issues identified will be repaired by the in-house fleet team. Inspection of any spillages or leaks from containment will be completed at least daily by site operatives. The results of all daily and weekly monitoring will be recorded, as well as any remedial actions.

In the event of any potentially polluting leak or spillage occurring on site the protocol found within the following actions will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.



- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from flowing outside the EP boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.

All staff are trained on spillages and the use of spill kits, which are available throughout the site, in the event of a spillage or leak on site.

5.11 Build-up of Loose Combustible Waste, Dust and Fluff

The risk of the build-up of combustible waste, dust and fluff is low due to the following measures implemented on site:

- All plant and equipment are subject to a programme of planned preventative maintenance which follows the inspection and maintenance schedule recommended by the manufacturer. This includes corrosion prevention where applicable;
- Waste arrives within enclosed vehicles, if possible, to ensure no escape of dust during transit;
- All incoming waste is offloaded in close proximity to the storage areas to minimise unnecessary handling and transport distance therefore minimising the potential for wind-borne dust;
- Waste is stored in dedicated storage bays or containers which minimises the mobilisation of dust;
- Speed limits are implemented on site for all vehicles to minimise the mobilisation of particulates;
- The site benefits from good housekeeping. Suitably trained site operatives carry out manual/mechanical sweeping at regular intervals throughout the day, to reduce dust generation. Regular visual inspections ensure that any unacceptable levels of litter or loose combustible materials are identified with sweeping and mechanical cleaning carried out as required;
- The site is visually inspected by the Site Manager on a daily basis with a focus on monitoring the level of build up from dusts, fibres and fluffs. When it is deemed necessary, a specialist cleaning contractor is engaged to use an extendable hose and brushes to clean the building/elements of the structure. The baling machine is cleaned by site personnel on a weekly basis;
- Daily visual inspection of the site and site boundary is carried out by site operatives.

5.12 Reactions Between Wastes

The site does not accept waste types which are potentially incompatible with each other. To ensure that incompatible materials are not received on site, the site implements strict waste acceptance procedures to ensure the waste is as expected and that it can be accepted at the site.

Waste undergoes visual inspection at the weighbridge to confirm its description and composition against the relevant accompanying documentation.

For waste collected by Max Recycle, crews will visually inspect waste wherever possible as it is collected and in the event that something is found then the waste is not collected and a warning notice is affixed to the box, with a report made to follow up.

At the site, waste is offloaded whilst supervised by suitably qualified site operatives. Any non-conforming waste that is received, will either be removed to the designated quarantine



area, or the material will be returned to the driver. The site has procedures for dealing with non-conforming waste including the maximum storage time for waste in the area.

Tanks containing fuel are constructed so that any leaks/spillages are contained. Tanks are surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest tank within the bund. Bunds are impermeable and resistant to stored materials.

5.13 Waste Acceptance and Deposited Hot Loads

No burning, reactive / reacting or visibly hot (producing steam or heat) loads are accepted on site. In accordance with the waste acceptance procedures, each load is visually inspected at the weighbridge upon receipt, therefore minimising prohibited wastes and the acceptance of hot loads.

Instructions are given to customers to ensure no hot loads are accepted on site.

Should a hot load be deposited or identified on site, it will immediately be removed to the dedicated quarantine area and extinguished immediately using a fire extinguisher. Any fire damaged waste will be removed from site the same day to a suitably licenced facility for disposal.

5.14 Hot and Dry Weather

During periods of extreme hot weather (defined as temperatures higher than 25°C on two consecutive days) the following actions will be carried out:

- Concentrated beams of sunlight or glare reflected onto stockpiles through surfaces will be prevented (all waste is stored within a building or container);
- Increased vigilance is communicated to employees via a Toolbox Talk;
- Temperature checks of waste storage areas will be increased to six times per day with particular attention paid to higher risk wastes such as green waste, municipal waste, and stored bales.

6.0 Prevent Self-Combustion

6.1 General Self-Combustion Measures

Self-combustion of waste on site is not considered to be a significant risk due to effective stock management, the short storage times and because waste is segregated into dedicated storage areas. As such, the site has waste acceptance and stock management procedures which are upheld by all employees at the site.

The controls in place to reduce the risk from fire are summarised as follows:

- All waste deliveries are checked at the weighbridge on arrival. Checks include both the paperwork and the full contents of the load. If the waste is found not to conform it will either be removed to the quarantine area or the driver will be required to return the material to the supplier;
- Storage times are minimised;
- Risk factors (e.g. mixing of materials and heat generated during treatment) are reduced by the segregation of waste within separate storage areas;



- Daily inspections of waste storage areas are undertaken to ensure material is contained within the bay, the maximum height is not exceeded, and that no prohibited items are present;
- No loads are removed without an onsite operative in supervision;
- A quarantine area is kept available; and
- Waste is handled in accordance with a safe system of work. On site personnel will be instructed and trained on the safe system of work.
- Only wastes included in the EP are accepted at the site.

Non-waste materials that pose a risk of self-combustion are stored as indicated in Table 2-1.

6.2 Manage Storage Time

Max Recycle implement stock management procedures which are effective at limiting the likelihood of self-combustion of materials stored on site. No waste is stored for more than 3 months.

Residual municipal waste will be processed via the Advetec unit within 48 hours during the working week and 72 hours over the weekend. Following treatment, the output floc from the XO22 is stored compacted and then stored within a roll on roll off skip before being transported off site within 1 week.

Municipal waste is emptied from bays on a first in first out basis. Waste storage times are detailed in Table 7-1.

When a waste container or bay is almost full, the Site Manager or nominated operative contacts the appropriate waste contractor to arrange collection. Once a container is removed, the storage area is cleared before a replacement container is provided.

6.2.1 Method Used to Record and Manage the Storage of all Waste on Site

Waste delivery drivers are required to weigh-in and weigh-out their loads at the site weighbridge. The weighbridge operator will inspect the waste, check delivery notes and/or duty of care transfer notes to ensure the wastes conform, and issue weighbridge tickets. In addition, the vehicle will be assessed to ensure that it is in a safe condition and unlikely to leak or spill contents. Any inadequacies are recorded and reported to the Site Manager, with the driver advised accordingly.

Suitably qualified site personnel will carry out daily checks of the site to identify the risks and inspect storage areas and stack height. This ensures that the site does not reach a level of overcapacity in respect to storage.

6.2.2 Stock Rotation Policy

Arrangements on site for waste ensure that a 'first in first out' approach is adopted so that the storage of waste does not exceed the prescribed duration. The Site Manager is responsible for stock rotation on site and ensures that waste with the earliest storage dates is processed first and removed from site first.

6.3 Monitor and Control Temperature

6.3.1 Reduce the Exposed Metal Content and Proportion of Fines

Strict waste acceptance checks are carried out to ensure that only permitted waste is allowed to be accepted on site. Loads are visually inspected upon arrival. Any loads found to



be contaminated will either be moved to the quarantine area prior to removal from site, or the driver will not be allowed to deposit the material.

The proportion of metal 'fines' within the waste is not considered to contribute to the risk of self-combustion. The types of waste accepted on site do not contain a high 'fines' content that would require management.

6.3.2 Monitoring Temperature

Regular site inspections are carried out during operational hours where site operatives will inspect the storage areas for any anomalies, and hotspots such as visual signs of heat, steam or vapour. Particular attention during visual inspections is paid to plant and equipment and other working practices or maintenance works such as hot works. Hotspots will be actioned immediately by the initiation of 'Golden Hour' incident reporting protocol and the situation will be allocated to an incident manager if required. A Fire Marshall will be responsible for isolating the hotspot within the quarantine area, and dousing with water if safe to do so.

6.3.3 Controlling Temperature

The following actions will be taken to reduce the risk of hot spots and to minimise the risk of self-combustion:

- Waste storage times are minimised;
- Risk factors (e.g. mixing of materials) are reduced;
- Waste is regularly moved, processed and removed from the site. Therefore, due to the nature of operations on site, waste is routinely turned releasing any heat generated within a pile; and
- Waste storage areas are sized according to the minimum requirement for operational efficiency.

6.3.4 Dealing with Hot Weather and Heating from Sunlight

Please see Section 5.14 above for the measures that will be taken during periods of extreme hot weather.

6.4 Waste Bale Storage

All waste bales are stored for the maximum durations described in Section 6.2 above, under normal operating conditions. Therefore, a sampling and testing protocol for temperatures within the bales is not required due to the short storage times.

7.0 Manage Waste Piles

All combustible waste storage, treatment and transfer takes place on impermeable surfacing with sealed drainage within the WTS building or within a RORO container externally for floc output from the Advetec XO22 unit.

Waste storage areas are discussed further below and should be read in conjunction with Drawing FPP1.

7.1 Maximum Pile Sizes for the Waste on Site

Combustible waste storage areas are described in Table 7-1 below and illustrated on Drawing FPP1.



Table 7-1 Waste Types, Storage Time and Dimensions

Bay / Storage Area	Storage Arrangement	Max Storage Time (months)	Length (m)	Width (m)	Height (m)	Volume (m ³)
Main waste bay	Bay in waste transfer station building	3	6	9	3.8	114 ^a
Metals bay	Bay in waste transfer station building	3	6	4.5	3.8	103 ^b
Plasterboard bay	Bay in waste transfer station building	3	6	4.5	3.8	103 ^b
Storage Bay	Bay in waste transfer station building	3	6	4.5	3.8	103 ^b
Floc from Advetec unit	40yd ³ Roll on Roll Off Container (external)	0.25	5.8	2.4	2.2	31 ^b

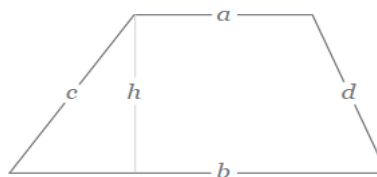
Notes:

Notes:

a) Volume has been calculated as area of a trapezoid x length. As follows:

Area of trapezoid =

$$A = \frac{a+b}{2} h = \frac{1+9}{2} \cdot 3.8 = 19$$



A x Length = 19 x 6 = 114m³

b) Volume has been calculated as a cuboid i.e. length x width x height.

7.2 Storing Waste Materials in their Largest Form

Waste is stored on site in its largest form before processing, and minimal waste processing activities are undertaken on site. Once processed the treated material is taken off site for further recovery as soon as possible (within a maximum of 3 months).

8.0 Waste Stored in Containers

8.1 Types of Containers you are Using

The site stores waste in the following containers:



- Roll-on Roll-off skips (Floc from Advetec unit).

8.2 Accessibility of Containers

All containers are stored externally and are accessible from at least one side so that a fire could be quickly extinguished.

8.3 Moving Containers in a Fire

In the event of a fire, the site's ability to move containers quickly would be utilised to reduce the risk of fire spread. The affected container would be moved immediately by site operatives, qualified in the operation of the mobile plant, to the quarantine area. The plant and equipment needed to move a skip/container is always available should one need to be moved.

9.0 Prevent Fire Spreading

9.1 Separation Distances

Waste is stored within the designated storage areas as illustrated on Drawing FPP1. Separation distances throughout the site have been reduced due to the fire wall construction as detailed below in Section 9.2.

9.2 Fire Walls Construction Standards

The bay walls are constructed from precast concrete "Lego" type interlocking blocks that act as both containment and protection. The blocks have the fire resistance properties shown below:

- Have a fire resistance period of at least 4 hours;
- Bay walls are constructed using fire resistant intumescent sealant; and
- All bay walls are constructed to 4.8m high. Waste is stored to a maximum of 3.8m so a freeboard of 1m is maintained to minimise the risk of fire spreading from bay to bay.

9.3 Storing Waste in Bays

The waste within the bays is stored to the maximum heights shown in Table 7-1. The following measures will be employed to minimise the risk of fire spreading:

- All waste in the storage bays will be operated on a first-in-first-out basis;
- Storage times are kept to a minimum;
- The specification and construction of the bays offers a thermal barrier exceeding 4 hours;
- The bays benefit from a freeboard of 1m and open faces are located at least 6m from other sources of combustible materials to minimise the potential risk of lighted material igniting other wastes; and
- In the event of a fire occurring in a bay, the quarantine area will be used to segregate non-burning waste in order to isolate and minimise the potential impact of the incident.



10.0 Quarantine Area

10.1 Quarantine Area Location and Size

The site benefits from availability of a designated quarantine area.

The location of the site's waste quarantine area is illustrated on Drawing FPP1, and detailed in Table 10-1 below. The area benefits from sealed drainage and is large enough to hold at least 50% of the largest combustible stockpile on site, whilst maintaining a 6 metre separation distance from other combustible materials, and buildings.

Table 10-1 Quarantine Area Dimensions

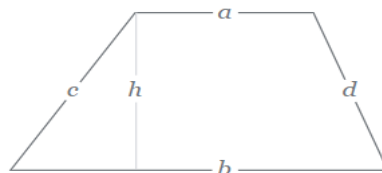
Quarantine Area	Primary Use	Length (m)	Width (m)	Height (m)	Volume (m ³)
Fire Prevention and Non-Conforming Waste	Dousing of burning/smouldering waste and/or separation of unburnt waste. Separation of non-conforming waste prior to removal from site.	8.5	3.5	4	76.5 ^a

Notes:

c) Volume has been calculated as area of a trapezoid x length. As follows:

Area of trapezoid =

$$A = \frac{a+b}{2} h = \frac{1+3.5}{2} \cdot 4 = 9$$



$$A \times \text{Length} = 9 \times 8.5 = 76.5\text{m}^3$$

Both quarantine area has been sized to hold 50% of the largest waste bay, where the largest bay is the main waste bay which has a maximum volume of 114 m³.

The quarantine area can hold at least 76.5 m³ of waste. A 6m separation distance is maintained around all sides of the quarantine areas, at all times.

The placement of the quarantine areas is based on the following factors:

- It allows for the prompt and direct removal of smouldering, burning or fire damaged wastes from the waste storage and to allow access by the Fire & Rescue Service (FRS);
- Proximity to flammable liquids – the quarantine area is situated at least 6m from any potentially flammable liquids on site such as heating oil tank; and
- Firewater containment – any water used to extinguish a fire within waste moved to the area would be contained in line with the measures outlined in Section 15 below.

10.2 How to Use the Quarantine Area if there is a Fire

The Site Management will instruct all site operatives when and how the unburnt waste, or any hot loads delivered accidentally to site, will be moved to the quarantine area. Following an



incident, the area will be used (once cleared of unburnt waste) to store burnt material prior to transporting it for disposal. The following procedure will be implemented on site:

- When it is safe to do so, the waste will be moved by on site plant to the quarantine area;
- The movement of the waste will be overseen at all times by the Site Manager to minimise any spillages and ensure the area is not overfilled;
- To limit any spillages, plant will not be overfilled when moving the waste;
- Any burning/smouldering waste will be doused using the relevant fire extinguisher, or a fire hose; and
- Burnt waste will be taken off site to a suitably licensed facility within 48 hours.

All site operatives will be trained to follow this FPP and all procedures listed in the above sections.

10.3 Procedures to Remove Material Stored Temporarily if there is a Fire

In the event of a fire, any non-compliant waste will be removed from the area within 1 hour and temporarily stored at least 6m from any other combustible material of ignition sources on site.

11.0 Detecting Fires

11.1 Detection Systems in Use

The site benefits from an automatic fire detection alarm system. This system is tested and maintained by a contractor appointed by the landlord.

The detection system is configured using the following elements:

- Control panel with repeater panel;
- Visual/fault indication check;
- Fault buzzer;
- Addressable manual call points;
- Heat/smoke detectors;
- Sounders;
- Tyne and Wear Fire and Rescue Service (TWFRS) link;
- E/L above control panel.

The alarm is monitored centrally 24 hours a day 365 days a year, in addition to providing a direct link to TWFRS. If an alarm was triggered, inside of operational hours, site operatives trained in the management of fire incidents will assess the cause of the alarm and implement the appropriate actions.

Outside of operational hours, the monitoring station would notify the on call Max Recycle manager who would attend site to establish the severity of the incident, and implement the appropriate actions.

Max Recycle's landlord is responsible for employing competent certified contractors to maintain its fire detection and alarm system.



Fire Marshals are trained in the detection of fires and therefore will provide an additional level of management for fire detection. Their responsibilities include monitoring any activity that may give rise to the risk of fire including:

- Preventing the accumulation of combustible material in offices and storage areas, particularly near potential sources of ignition;
- Removal of incorrectly sited containers to safer locations to allow correct positioning and access;
- Ensuring no unauthorised access to buildings;
- Enforcement of the 'no smoking' policy;
- Maintenance of clear walkways, doorways and escape routes;
- Monitoring contractors, particularly those completing hot works;
- Routing area inspections and hazard spotting.

In the event that a fire is noticed at the site, staff will notify the Site Manager, and contact the FRS as appropriate.

11.2 Certification for the Systems

The detection system is installed in accordance with BS5839 Pt 1 (non-domestic premises), and its operation, maintenance and testing conforms to BS5839-Part 1:2017 or BS5839-Part 6:2017.

12.0 Suppressing Fires

12.1 Suppression Systems in Use

The site relies upon manual fire suppression. The locations of all fire extinguishers, and hose reels on site are illustrated on Drawing FPP1. Foam, water, carbon dioxide and powder extinguishers are provided on site. The extinguishers are serviced and inspected by a competent contractor and a register is maintained. Fire Marshalls carry out visual checks on extinguishers and hose reels to confirm their presence and that they have not been tampered with. The Site Manager records inspections on the daily fire checklist.

Outside of operational hours, firefighting would be carried out by the TWFRS and their ability to enter a building on site would be determined by a dynamic risk assessment once they arrived on site, and evaluated the extent of the fire.

Max Recycle staff attendance would be initiated by calling staff on the stand by rota. Contact numbers are available in Appendix A.

The building is constructed to the appropriate standards. Should fire compromise the stability or integrity, the building and site will be immediately evacuated.

12.2 Firefighting Techniques

12.3 Active Firefighting

A fire on site will initiate an evacuation procedure by the fire marshal team, and overseen by a senior incident controller.



The closest Fire Station is at Washington, to the north of the site. Using Google directions and mapping³, the drive time is approximately 14 minutes and it is approximately 7.9 miles between the site and the Fire Station.

12.3.1 Fire Extinguishers and Fire Hoses

See Section 12.1 for details on fire extinguishers, and hoses. Fire extinguishers and hoses are to be used in the following circumstances:

- Where operators are trained in use, and if confident to tackle the fire;
- On very small fires, or to facilitate own escape if trapped by fire.

12.3.2 Small Fire

A small fire or area of smouldering waste will be dealt with as follows:

- A fire or area of smouldering waste will not be dealt with in-situ. If safe to do so, mobile plant will be utilised to move the material/skip into a central area away from buildings and structures and unburnt material that could become a light on contact. If appropriate, the rear doors of the skip will be opened;
- Depending on the size / nature of the fire the waste will either be:
 - Extinguished immediately⁴ utilising the fire extinguishers or hoses; or
 - Moved to the appropriate quarantine area and extinguished⁵.

Depending on the size, location and nature of the fire the burning waste will be pulled into the dedicated quarantine area following the procedures detailed in Section 10.2.

Once a small fire is dealt with the remaining area will be visually inspected immediately by site operatives for any signs that a fire / smouldering waste still remains. The same procedure, detailed in this Section, will be implemented should this be the case.

Competent staff will be available throughout operational hours to operate waste handling plant.

12.3.3 Uncontainable Small Fire or Large Fire

The following procedure is in place on site that will be followed in the event of a small fire becoming uncontainable or in the event of a major fire onsite;

- The Site Manager and FRS will be notified immediately and the EA as soon as practicable;
- Following arrival of the FRS, all site staff will take instructions from the FRS which may include any of the following:
 - If possible, waste that is unburnt will be dampened down to prevent the fire from spreading further;
 - If possible, unburned material will be separated from the fire using heavy plant;

³ Google Maps, Accessed in April 2024.

⁴ Should a single item of the waste stream be alight, and the fire is well contained, then the waste will be doused via use of an extinguisher or fire hose as it is pulled from the waste pile. The burned / fire- damaged portion is then removed to the quarantine area and the remaining waste returned to the pile.

⁵ If the fire is not easily contained to a single item, then the obviously alight portion of the waste will be removed to the quarantine area.



- The burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- The site and buildings will be evacuated.

In the event of a major fire on site outside of operational hours, the FRS will be contacted by the Max Recycle staff member who is on the stand-by rota. On call staff, are trained in the use of plant and equipment and would be able to assist the FRS as appropriate.

13.0 Water Supplies

13.1 Available Water Supply

Sources of water available onsite are:

- The on-board water supply from FRS vehicles;
- Mains water supply; and
- Moors Burn (15m north of the site).

13.2 Water Supply Calculation

The largest stockpile of combustible waste stored in any one time at the site is has a maximum volume of 114m³. Based upon the FPP guidance firewater calculations, it is estimated that approximately 135,720 litres of water would be required to put out the largest combustible stockpile on site. The calculation is shown in Table 13-1 below.

Table 13-1 Fire Water Calculation

Maximum pile volume (m ³)	Water supply needed (l/min)	Overall water supply needed over 3 hours (litres)
	Pile volume x 6.67	Water supply x 180
114	760	136,800

Of the 760 litres/min required, 500l/min is able to be supplied via the mains water supply on site. The remainder would be supplied by the fire services on-board water supply or pumped from the Moors Burn.

Although not relied on due to being potentially ephemeral, there is also a balancing pond serving the adjacent housing estate located 10m to the north east of the Site.

14.0 Managing Fire Water

14.1 Containing the Run-Off from Fire Water

All combustible waste is stored within the WTS building on impermeable surfacing. To prevent runoff reaching drainage systems, in the event of a fire, the doors to the WTS building would be blocked to prevent any water escaping the building.

Containment provision at the site is as follows:

The waste reception building is 36m x 20m (720m²). A firewater boom of 20cm diameter would be employed across entrances and exits to the building. This would enable the building to contain 144m³ (144,000 litres) of firewater.



15.0 During and After an Incident

15.1 Dealing with Issues During a Fire

The site will not continue to accept waste if there is an active fire on site. Waste producers will be notified in advance to prevent delivery vehicles arriving on site during and immediately after a fire.

15.2 Notifying Residents and Businesses

An emergency contact sheet will be included in Appendix A. In the event of a fire the following procedure will be followed:

- Nominated employees will be responsible for locating the emergency contact list included in Appendix A;
- In the event of a large fire, 999 will be dialled first;
- Nominated individual will phone each of the local businesses included in Appendix A, to keep them informed followed by the sewage service if appropriate to do so; and
- Finally, the EA incident hotline will be dialled once the situation is under control.

15.3 Clearing and Decontamination after a Fire

After a fire event, the following procedure will be implemented depending on the severity of the fire:

1. A small and containable fire that can be safely dealt with in-house using suitably trained staff and firefighting equipment located on site: The fire will be recorded in the site diary, including the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this FPP and the site's EMS as required.
2. A larger fire that requires the presence of the Fire Service: If the site operatives have been told to evacuate or cease operations by the Fire Service, the site will wait until told safe to re-enter site and resume operations. Any closure of the site will be followed by informing customers and the regulatory authorities. The fire will be recorded and an online incident report will be completed to detail the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this FPP and the site's EMS as required.

Should damage be sufficient to prevent the site from being able to store waste, the site will cease accepting waste and will divert to a suitably licensed facility, as described above.

The Site Manager will liaise with the EA to determine a plan-of-action to introduce normal operations at the site, and the timescales involved to achieve this.

A visual assessment will be carried out by the Site Manager to determine whether the waste can be treated on site. Wherever possible, unburnt wastes will be separated from fire damaged piles. If waste piles have become mixed, then it is likely that the waste will be removed from site to a suitably permitted facility.

The Site Management will determine what decontamination measures will be required to be carried out proportionately to the impact caused by the fire. The period of time taken to restore the site or affected part of the site to operational status will be determined by the



nature and extent of the fire. If the affected area does not impact the rest of the site's operation, operations will re-start as and when appropriate.

15.4 Making the Site Operational after a Fire

After a significant incident, an assessment will be undertaken by a suitably qualified individual. Technically competent managers and/or engineers will assess the degree of damage caused by a fire and the residual risk from fire damaged waste, emissions or equipment. Burnt waste material will be kept on site for a short period of time if required for a subsequent internal investigation. Following this, the material will be transferred off site to a suitably licensed disposal facility.

Following an incident, the site will be cleaned using on-site jet-washers/sweepers or by third party specialist cleaning services if necessary.

16.0 Conclusion

This FPP is considered to be a 'working' document that is reviewed and updated annually or as required should any of the following occur:

- A fire on site;
- A change or review of legislation; or
- If the site is instructed to do so by the EA.

It is the responsibility of the Site Manager or nominated person to maintain this FPP and to ensure it is adhered to in the event of a fire on site.





Appendix A Emergency Contact Sheet

Max Recycle UK Ltd

Fire Prevention Plan

SLR Project No.: 416.063972.00001

15 July 2024

Name	Telephone number
Max Recycle Emergency Contacts	
Patrick Roche (Max Recycle)	07855 416 530
Scott Hawthorne (Max Recycle)	07855 495 023
Mark Green (Max Recycle)	07719 557 880
Emergency Services	
Tyne and Wear Fire & Rescue Service	999 or 112
Environmental Regulator	
Environment Agency Incident Hotline	0800 80 70 60
Immediate Local Businesses	
Fencehouse Timber Engineering (east)	0191 385 6370
Gentoo Group (south)	0191 525 5000
BKR Furniture (southeast)	0191 385 2061
LRN Distribution Durham	0191 250 5529
Local Residents	
Local residents on Sleeman Close, Newton Drive & Blackthorn Way would be notified in person as necessary and given instructions as directed by the TWFRS in relation to the need to evacuate or shut doors and windows in the event of a fire.	

