

Ellete Waste Limited

Fire Prevention Plan

Mearclough Road WTF – Appendix F EPR/NP3699ZH

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TETRA TECH

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1.0 Introduction

- 1.1.1 This fire prevention plan (FPP) has been produced for Ellete Waste Limited (EWL) who operates a Waste Treatment Facility (WTF) under environmental permit EPR/NP3699ZH. In drafting this document, consideration has been given to the applicable requirements set out within the Environment Agency Guidance on fire prevention¹ and the Environment Agency FPP template².
- 1.1.2 The objective of this document is to set out the measures that are planned to minimise the risk of a fire starting and to ensure that should a fire occur appropriate measures are in place so that it is identified and managed effectively.
- 1.1.3 This plan is reviewed at least every 4 years or more frequently following a significant plant modification. Should significant changes be required these would be communicated to all staff.

1.2 Site details

- 1.2.1 The EWL WTF facility is located on the corner of Mearclough Road and Fall Lane. The site address is Mearclough Road, Sowerby Bridge, Halifax, HX6 3LF.
- 1.2.2 The main activity includes the temporary storage and treatment of non-hazardous household, commercial and industrial waste.
- 1.2.3 The permit authorises the operation of a household, commercial and industrial WTF with the capacity of 35,000 tonnes per year and no more than 280 tonnes per day will be accepted at the facility. The amount of waste which can be stored at any one time is 300m³.

¹ Environment Agency, Fire prevention plans: environmental permits, updated 11 January 2021. Available online: <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>

² Environment Agency, Template for fire prevention plan: environmental permits, updated 11 January 2021. Available online: <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits>

2.0 Using this Fire Prevention Plan

2.1 Location of the FPP

- 2.1.1 The current FPP will be stored as a hard copy in the site office and a digital copy will be kept at on the company intranet within the environmental management system (EMS) for the site.
- 2.1.2 A copy of the FPP will also be made available to the local Fire and Rescue Service (FRS) office.

2.2 Who this plan is for

- 2.2.1 This plan should be made available to and read by the following people:
 - Mearclough Road WTF site staff;
 - Contractors working on site; and
 - Local fire officers.

2.3 Testing the plan and staff training

- 2.3.1 Staff inductions include awareness of the FPP, where it's located and when to use it. Monthly toolbox talks include a refresher regarding the FPP content and details of any updates to it. A fire drill is conducted at the site every 6 months.
- 2.3.2 The site has designated fire warden, who undergo fire warden training as agreed with the local FRS. At least one fire warden must always be on site when the facility is operating.
- 2.3.3 The FPP will be reviewed regularly as part of the EMS review cycle and any updates will be communicated to the relevant people. Following a fire event, a full review of the FPP will also be undertaken in conjunction with the local FRS to ensure any lessons learned are incorporated and communicated to the relevant people.

3.0 Types of combustible materials

3.1 Combustible waste

- 3.1.1 The main focus of this FPP is the principal combustible material stored at the facility, which are the wastes, consisting of non-hazardous and industrial wastes, in various forms.
- 3.1.2 Appendix B to this report provides a list of the European Waste Catalogue (EWC) codes accepted at the site and their descriptions. Only wastes listed in this table are accepted at the site and no more than 35,000 tonnes per annum will be accepted, with a maximum storage at any one time of 300m³. The inert materials are not combustible; therefore, they have not been considered further within this FPP.
- 3.1.3 Table 3-1 below provides a list of the combustible wastes at the facility.

Table 3-1: Main combustible wastes

Combustible waste	Description
Mixed waste	Non-hazardous skip waste to be stored at the WTF for treatment or disposal off site.
Waste treatment trommel fines	Non-hazardous mixed waste from the mechanical treatment of wastes
Sorted fractions	The recyclable materials that are sorted from the mixed waste and stored separately, comprising metal, plastic, wood and plasterboard.
Shredded metal waste fractions/fluff	Non-hazardous shredded metal waste fractions, fluff-light fractions received from metals treatment facilities, stored separately for recycling off site.

- 3.1.4 See Sections 6.0 and 7.0 for further detail regarding management of the waste.

3.2 Other combustible materials

- 3.2.1 Table 3-2 below provides details of the other combustible (non-waste) materials stored on site and provides an indication of the total amounts and form of material stored, as well as the maximum storage time and the method for management.
- 3.2.2 The largest volume of combustible material is the diesel fuel which is used for onsite plant and vehicles. Diesel is stored within a 2,500 litre double-skinned and bunded tank. The fill points have an auto shut-off system and benefits from a long length connector hose. Spill kits are located within the WTF building in the event of spillages.

Table 3-2: Other combustible and/or flammable materials

Combustible material	Description	How the material is stored and maximum storage time	Maximum volume stored on site
Diesel	Fuel for onsite plant and vehicles	2,500l within a new double skinned and banded tank. Diesel is in constant use and tank requires refilling approx. 4 times per year	2,500 lt
Oils and greases	Used for maintenance	2 no. 45 gallon drums stored within a banded area. Usage is variable	0.35m ³
Grease cartridges	Used for maintenance	25 no. individual units, each measuring 12 x 2 inch	25 individual units

4.0 Fire Prevention Plan contents

4.1 Activities at the site

- 4.1.1 The main activity undertaken at the site is the storage and transfer with treatment of non-hazardous wastes; D15 (storage pending any of the operations numbered D1 to D14) and R13 (storage of waste pending any of the operations numbered R1 to R12). Waste streams will be sourced from local waste recycling operations.
- 4.1.2 This facility carries out treatment activities which include mechanical and manual sorting by use of a trommel and a hand picking station. This waste is sorted by hand and by mechanical means to separate plastic and metal from the waste.
- 4.1.3 Waste accepted at the site for treatment is tipped within the reception area of the waste treatment building. Both tipping, treatment and storage will be taking place inside the WTF building. The external yard is also used for the storage of treated wastes. Incoming skip waste and fragmentiser fluff waste will then be sorted separate to each other, by hand and by mechanical means to separate plastic and metal from the waste. The sorted metals and plastics are separately combined with other metal and plastic wastes and placed in the respective containers for transfer off site. Residual waste will be stored within the building in a 40yard Ro-Ro skip. Residual fragmentation fluff will be also be stored within this skip. Please note that if fragmentation fluff is being treated then this skip will be emptied prior to treated in order to provide a storage area. Larger wastes such as wood and plasterboard are subject to manual treatment to remove from mixed loads.
- 4.1.4 Treated waste will be sent onwards to waste recycling facilities for recovery.

4.2 Site plan

- 4.2.1 A site plan, including the location of the quarantine area, mobile plant, water supplies and site drainage is provided in Drawing 1 and vehicle movements are detailed in Drawing 2.

4.3 Plan of sensitive receptors near the site

- 4.3.1 Drawing 3 shows nearby sensitive ecological receptors within 1 km of the site.
- 4.3.2 Drawing 4 shows the human receptors (e.g. schools, houses, playing fields) within 1 km of the site.

5.0 Manage common causes of fire

5.1 Arson

- 5.1.1 The site is secured to protect the public and minimise the likelihood of unauthorised access.
- 5.1.2 Access to the site is limited to specified entry points as shown in Drawing 1 and Drawing 2. A boundary wall of circa 2-3 m in height constructed of bricks and palisade fencing surrounds the site. Three CCTV dome cameras are in place around the site covering all areas where waste is stored, with two cameras in the external area and one camera placed within the building. The CCTV is monitored during out of hours by a monitoring company. During operational hours, the feed is recorded on a hard drive.
- 5.1.3 In addition to the CCTV system, the site is subject to regular out-of-hours security patrols by a dedicated security guard.
- 5.1.4 In the event of a vandal or arsonist accessing the site despite security arrangements on site, sensitive areas within the site are those locations where combustible materials are within the main WTF building which will also be locked out of hours. Intruder alarms will be activated out of hours and a notification is automatically sent to the mobile phones of nominated EWL persons.

5.2 Plant and equipment

- 5.2.1 Mobile plant is used at the site include:
 - 1no. mechanical loading shovel;
 - 1no. 360 mechanical grab.
- 5.2.2 When not in use, the loading shovel and grab are stored outside the building and more than 6 m from the location of combustible wastes and the site boundary shown on Drawing 1.
- 5.2.3 Failure of plant and equipment within the WTF may have the potential to cause a fire if in proximity to combustible materials. The WTF plant and equipment is subject to routine maintenance and inspection. Non-intrusive checks by Operators on the plant/equipment they are operating are undertaken as well as preventative checks comprising intrusive inspections and maintenance carried out by trained maintenance personnel. The periodicity of the maintenance and inspection is identified in site maintenance schedules.
- 5.2.4 EWL vehicles will be fitted with fire extinguishers. Additional fire extinguishers are located within the building. Mobile plant (including vehicles) when not in use, will

be parked away from the areas where waste storage and processing operations take place

- 5.2.5 At this stage the site does not accept 3rd party waste. All waste is brought to the site by their own skip wagons, allowing scheduled arrival times to be controlled. All the removals are sorted by the transport operator who is based site. All waste removed from site is moved by our own wagons except the metal skip that is covered by a third party.
- 5.2.6 The site operates 3 of these wagons, hence the maximum number of vehicles arriving at any time is 3. This shows that the site is in total control of what enters the site and when it enters the site.
- 5.2.7 These vehicles will be onsite only to deliver or collect waste and will not be parked overnight on site. The maintenance of the HGVs is tightly regulated by the Vehicle Operators Standards Agency (VOSA). Under this government department vehicles are maintained on a scheduled basis. The onsite plant is not subject to the VOSA regime. However, the same ethos of continual scheduled servicing is used. This is a preventative approach and keeps the plant in a good working condition.
- 5.2.8 Should plant break down then there is coverage to carry on operating. There are also several plant hire companies in the local area. Should there be a plant breakdown / failure that cannot be resolved by the hiring of spare equipment and is of such magnitude that the facility cannot continue to operate properly or safely then the site will cease accepting waste. Skips that are already out will be collected and taken directly to alternative waste management facility.

5.3 Electrical faults including damaged or exposed electrical cables

- 5.3.1 All electrical equipment will undergo an installation test and regular PAT testing by a qualified electrician, the frequency of which depends on the equipment being tested. Inspections will be carried out in accordance with the inspection frequency assigned within the maintenance schedules and will be recorded. In setting maintenance frequencies, consideration will be given to prevention of fires.
- 5.3.2 If during daily plant inspections damaged or exposed cables are identified, this would be reported to the Site Manager and appropriate repairs arranged.

5.4 Smoking on site

- 5.4.1 There is no designated smoking area within the permitted boundary of the site. Smoking is not permitted in the site.

5.5 Hot works safe working practices

- 5.5.1 Hot works are only carried out on an ad hoc basis should maintenance or repair works require this. Any hot works to be undertaken on site will be controlled by Hot Works permits which will consider appropriate preventative measures to minimise the risk of initiating a fire. The permit to work will include the provision of a fire watch after any hot works have ended and will include details of when these should be undertaken. Appropriate measures will be recorded and those undertaking the work must comply with recommendations.

5.6 Industrial heaters

Use of industrial heaters

- 5.6.1 This is not applicable as there is no use of industrial heaters on site.

5.7 Hot exhausts and engine parts

- 5.7.1 All staff are trained to check for signs of hot exhausts and build-up of dust. There is a final check of the mobile plant and other vehicle exhausts prior to closing the site each day. Build-up of dust is prevented as set out in Section 5.11. The separation distance of at least 6 m between the stored wastes and any hot exhausts or engine parts minimises the chances of a fire occurring.
- 5.7.2 A fire watch, such as a visual check of exhausts, is carried out at the end of each working day to detect signs of a fire caused by dust settling on hot exhausts and engine parts.
- 5.7.3 All plant with exhausts are stored outside of the building, away from the combustible wastes. The treatment plant are electric so do not generate a hot exhaust.

5.8 Ignition sources

- 5.8.1 There are no permanently installed naked flames, space heaters or other sources of ignition. In the event that such sources need to be brought to the site e.g. for maintenance they will be kept at least 6m away from combustible or flammable waste.
- 5.8.2 Hot works, exhausts and engine parts are dealt with in sections 5.5 and 5.6 above.

5.9 Batteries

- 5.9.1 The facility does not accept batteries as a waste stream. If this waste is received inadvertently, it will be stored appropriately in the quarantine area.

5.10 Leaks and spillages

- 5.10.1 The site will not accept waste oils. Fresh oils and fuels kept on site for site plant are stored in bunded containers. Site staff are trained in transfer and handling procedures and will oversee any filling of containers or site plant/vehicles.
- 5.10.2 Spill kits are located in the site office. Regular vehicle checks are carried out by hauliers and staff are trained in the spillage procedure within the management system. In line with the daily check of hot exhausts, the mobile plant and onsite vehicles are checked for signs of fuel leakage prior to closing the site each day.

5.11 Build-up of loose combustible waste, dust and fluff

- 5.11.1 Daily site checks are carried out which include inspecting the site for build-up of loose combustible waste, dust and fluff and arranging cleaning if needed. A dust management plan is in place for the site and sets out the management measures in place to minimise build-up of loose materials at the site.

5.12 Reactions between wastes

- 5.12.1 The waste acceptance and management procedures for the site ensure that no incompatible wastes are stored where they could react with one another. Site personnel are available on site to routinely check waste deposited to remove or arrange removal of any wastes deposited in the incorrect area.
- 5.12.2 The tipped waste is checked by the site operative for incompatible wastes which may have been hidden within the skip, such as batteries or paint tins. Small items which may be fragile are removed manually. Large items are removed by the grab. This step reduces the possibility of reactions between different waste types.
- 5.12.3 Any non-compliant waste would be placed in the quarantine skip where it would remain until alternative disposal arrangements are in place. If required, the waste can be placed within a container to provide further protection. The quarantine area is shown on Drawing 1.

5.13 Waste acceptance and deposited hot loads

- 5.13.1 Waste acceptance procedures are in place and include procedures for checking for and management of hot loads. These procedures will seek to avoid hot loads being deposited in the waste storage areas.
- 5.13.2 In the event that a hot load is identified, it will be kept away from vulnerable areas such as waste storage areas and will be deposited in the quarantine area, which is located at least 6 m from the site perimeter, any buildings and other combustible/flammable materials. In the event that a hot load is identified in a container, the whole container will be moved to the quarantine area and the fire

managed within the container. The Site Manager must be notified. Details of the load (name, registration number, type of load, producer or source of waste should be recorded and the Environment Agency informed.

- 5.13.3 If the load has entered the site prior to deposit and without risk to personnel, it should be redirected away from any storage areas where the material can be extinguished.
- 5.13.4 Where necessary the Fire and Rescue Service will be called out. The Environment Agency will be informed of the incident.
- 5.13.5 After the material has been extinguished it will be quarantined and left for 48 hours. The waste will be monitored during this 48-hour period.
- 5.13.6 The quarantine area is located as shown on Drawing 1.

5.14 Hot and dry weather

- 5.14.1 Combustible wastes will be deposited and stored within with the building prior to treatment, which protects the waste from the effects of hot and dry weather.
- 5.14.2 Other wastes including metals and wood will be stored in metal skips outside the building.
- 5.14.3 During hot weather, additional monitoring will be implemented to check temperatures of waste piles. Trained personnel will be responsible for conducting temperature checks on combustible wastes at specified intervals.

6.0 Prevention self-combustion

6.1 General self-combustion measures

- 6.1.1 Combustible waste accepted at the site is at risk of self-combustion if stored for more than 3 months. Therefore, potential at-risk areas would be areas in which these materials are stored including the loading areas. However, there are management procedures in place to ensure that, where practicable, materials will be maintained on a first in first out basis. Accepted waste and sorted/treated wastes will usually not be stored on site for more than 7 days, thus negating the risk.
- 6.1.2 Waste management and acceptance procedures will be established to ensure that maximum storage times are complied with.

6.2 Manage storage time

Method used to record and manage the storage of all waste on site

- 6.2.1 Wastes are the main combustible materials stored on site. Site waste acceptance procedures are in place, separate to this FPP, as part of the site management procedures.
- 6.2.2 Storage time for wastes is recorded via waste acceptance records. The maximum throughput of the site is 280 tonnes per day.
- 6.2.3 Records and/or waste transfer notes (WTNs) for all wastes entering the site and for all wastes/skips leaving site for recovery or disposal elsewhere will be kept at the site office.

Table 6-1: Storage of main combustible and/or flammable waste

Combustible material	Form	Maximum storage capacity (tonnes)	Expected maximum storage time under normal operation	How the material is stored
Within the waste treatment building				
Incoming waste/ mixed skip waste	Loose mixed waste pre processing	32	7 days	Loose in the waste reception area. Please note this is a temporary stockpile of pre-processed waste
Metals	Sorted metals	3		Within a bin container
Contraries	Removed contraries	3		Within a bin container
Fines	Segregated fines	25		Loose
Oversize rejects	Sorted oversize waste	3		Within a concrete bay

Combustible material	Form	Maximum storage capacity (tonnes)	Expected maximum storage time under normal operation	How the material is stored
Waste residue skip - non-recyclables or plastics (plastics if frag fluff is being processed)	Processed wastes	15		Within a 40yd skip
Waste stored externally				
Metals	Sorted metals	15	7 days	Within a 40yd skip
Wood	Sorted wood	15		Within a 40yd skip
Plasterboard skip	Plasterboard	15		Within a skip in a bay
Quarantine	N/A	8		Within a skip

Stock rotation policy

- 6.2.4 Quantities of incoming and outgoing material for the site are recorded in metric tonnes utilising a known weight by volume ratio. This ratio is to be checked annually using an off-site weighbridge, to ensure the weight by volume ratio is as close as possible to an ideal calculation. The site waste management procedures set out the methods for recording of waste delivered to site and for tracking of where waste is sent within the facility. This information is recorded and stored electronically. Waste will be processed in rotation in accordance with waste management procedures, as far as is practicable.
- 6.2.5 Waste volumes build-up gradually over the course of the working week whilst deliveries are taking place, but every effort is made to reduce storage volumes to low levels by the time the site closes at 16.00 on Sundays and will, therefore, be at low volumes when the site opens again on Monday morning. As far as practicable waste will be processed in rotation in accordance with waste management procedures.
- 6.2.6 Prior to a planned shutdown, stored waste levels would be run down until the storage area is empty and the suppliers notified well in advance in order to organise the supply accordingly. During an unplanned shutdown, waste deliveries will be stopped. The waste already stored on site will remain in the storage building for the duration of the unplanned shutdown. If required, the waste can be extracted from the building using the front-loader vehicles to deliver the waste to the nonconforming waste quarantine area, from which it can then be loaded onto lorries for transport off site.
- 6.2.7 Inspection forms within the EMS will record this and the incoming waste records provide daily input/output of waste.
- 6.2.8 As set out in 6.1.1, wastes that are at risk of self-combustion will not be stored for more than 14 days.

6.3 Monitor and control temperature

6.3.1 EA FPP guidance requires any waste stored for more than three months to have provisions in place to control heat to prevent self-combustion, which include:

- Reduce the exposed metal content and proportion of 'fines';
- Controlling temperature;
- Monitoring temperature.

6.3.2 Waste will normally not be stored for longer than 7 days, thereby reducing the likelihood of significant temperature increases.

Dealing with hot weather and heating from sunlight

6.3.3 The combustible waste storage is located within inside the building or within a skip, to protect these wastes from sunlight which will protect the waste materials from heating due to higher temperatures or sunlight.

7.0 Management of wastes

7.1 Managing waste piles

- 7.1.1 Incoming combustible loads will be directed to the waste reception tipping area within the building.
- 7.1.2 A load upon deposit will be manually sorted to segregate out all recyclables which will then be separately stored in dedicated storage areas inside the WTF building. The remaining waste will be transferred to the trommel. Once treated, the waste will be transferred from the screened waste bay beneath the trommel.
- 7.1.3 Waste which is ready to be sent off site will be loaded by the mechanical shovel into vehicles.
- 7.1.4 The largest accumulation of combustible waste at the site is within the waste residue skip located inside the treatment building. A freeboard is not used within wasted stored in skips at the site.
- 7.1.5 The waste treatment line is comprised of a bins that are located beneath the line.
- 7.1.6 A bay at the end of the treatment line will be used to capture oversized rejected waste which will be moved by mechanical means into the appropriate skip for recycling. The bay will hold up to 16m³ of waste but will be normally kept empty when the treatment line is not in use. General non-hazardous residues and fragmentiser fluff residues will be moved back into their respective waste storage bays.
- 7.1.7 The volume of each pile of waste within the building will be far below 450m³, which is the maximum allowed. Finer fractions of waste will not exceed the FPP limit of 300m³.
- 7.1.8 All bays are waste storage areas have been marked up on the site layout plans within Drawing 1.

Storing waste materials in their largest form

- 7.1.9 Waste stored in the WTF building will be in their largest form (i.e. how they arrived on site) as well as in their smallest form after treatment. Wastes are stored prior to and after treatment before being bulked and to recycling or disposal sites.

Table 7-1: Maximum pile sizes

Waste stream	Location (must match site plan)	How it is stored	Max length (m)	Max width (m)	Max height (m)	Max volume (m ³)	Max time it will be stored
Within the waste treatment building							
Incoming waste/ mixed skip waste	Within the waste reception building	Loose in the waste reception area. Please note this is a temporary stockpile of pre-processed waste	4	6	3	72	7 days
Metals	Below the entrance of the trommel	Within a metal container	1	1.2	1.5	1.8	7 days
Contraries	Under the picking line	Within a bin	1	1.2	1.5	1.8	7 days
Fines	Below the trommel	Loose	2.1	3	2	12.6	7 days
Oversize rejects	Picking line outfall bay	Within a bay	4	2	2	16	7 days
Waste residue skip - non-recyclables or plastics (plastics if frag fluff is being processed)	Within the waste reception building	Within a 40yd skip	6.1	2.5	2.4	36.6	7 days
Waste stored externally							
Metals	External yard	Within a 40yd skip	6.1	2.5	2.4	36.6	7 days
Wood	External yard	Within a 40yd skip	6.1	2.5	2.4	36.6	7 days
Inerts (soil & stone)	External yard	Within a bay	14.9	4.3	3	192.21	7 days
Plasterboard	External yard	Within a skip in a bay	6.1	2.5	2.4	36.6	7 days
Quarantine	External yard	Within a skip	3.4	1.6	1.3	7.1	7 days

7.2 Where maximum pile sizes do not apply

Waste stored in containers

Types of containers you are using

- 7.2.1 The combustible materials to be stored in skips include wood, plasterboard, metal and plastics. These skips are located more than 6 m away from other permanent combustible waste storage. The approximate dimensions of a 40 yard³ skip are 2.5 x 6.1 x 2.4 m. The maximum volume of a single skip is approximately 37m³ which is much lower than the most conservative maximums stated within the FPP guidance.
- 7.2.2 Two containers will be placed beneath the picking station to capture and temporarily hold separated fractions. These will be “3 yard” small bins/skips. The

³ <https://www.mickgeorge.co.uk/skip-hire/skip-size-guide#>

contents of these skips will be placed into the larger skips stored when full, normally on a daily basis.

- 7.2.3 Table 7-1 provides details of the main combustible materials stored in skips on site and provides an indication of the total amounts stored and how they are stored.

Accessibility of containers

- 7.2.4 Skips are accessible from the ground and are open at the top. Skips can be accessed from all sides. Therefore, each skip is accessible to site staff or the FRS so any fire inside can be put out. Skips beneath the picking station will be open and will contain waste only when the picking station is operating.

Moving containers in a fire

- 7.2.5 In the event of a fire, either on site plant such as the grab or roll on/roll off vehicles will be deployed to move the containers as soon as is reasonably practicable to prevent the fire spreading. Non-burning skips will be moved to a location more than 6 m away from the fire to prevent the spread of fire.

8.0 Prevent fire spreading

8.1 Separation distances

- 8.1.1 The spread of a fire will be prevented by using the correct separation distances, as follows:
- Where not discussed below separation distances of at least 6 m between combustible waste and the site perimeter, buildings, or other combustible or flammable materials.
 - The plasterboard and wood skips are stored externally and separate by a concrete fire wall. The scrap metal skip is also stored externally and is more than 6m from other permanent waste storage areas. The waste residue skip is stored within the waste treatment building. The Ro-Ro skip itself will act as a “fire wall” between the waste and the building fabric. Furthermore, the building itself is constructed of concrete blocks at the bottom and double steel cladding at the top. In between the steel cladding there is fire proof rock wool. In the event of a fire within this skip, it will be moved to the quarantine area in the external yard for firefighting if required.
 - Hot loads will be moved to the quarantine area, which is located in the external forecourt area more than 6 m from any of the above.
 - Vehicles will be stored more than 6 m from a fire.
 - Concrete blocks are in place behind the waste quarantine area to ensure that fire will not spread beyond the site boundary. This is shown on Drawing 1.
- 8.1.2 The fuel tank is located under the waste treatment hopper. No waste is stored within this hopper and when operational a member of site staff will be present to monitor the process and ensure there is no risk of ignition. Fire wall construction standards
- 8.1.3 Compartmentation in buildings can help to reduce the level of hazard from fire through reducing the overall fire size. The maximum floor area in a compartment is considered to be the WTF building which is approximately 262m². The building does not have compartments other than the single concrete bay; it is a single large room. The walls making up the three sides of the storage bay will be designed to have a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within 4 hours.

8.2 Storing waste in bays

- 8.2.1 Table 7-1 above sets out the dimensions of bay and the maximum pile sizes. These include the minimum 1 m freeboard required at the top and sides to prevent fire spreading over and around bays.
- 8.2.2 The concrete Lego blocks have the dimensions 600 x 600 x 1200 mm and are categorised as Class A1 fire resistant in accordance with EN 13501-1, meaning they are non-combustible.

9.0 Quarantine area

9.1 Quarantine area location and size

- 9.1.1 The quarantine area is large enough to both:
- Hold at least 50% of the volume of the largest pile; and
 - Have a separation distance of at least 6 m around the quarantined waste.
- 9.1.2 The location of the quarantine area is indicated on the site layout plan, Drawing 1.
- 9.1.3 The quarantine area will be able to hold at least 16 m³ of waste to a height of 1m (greater than 50% of the largest pile or container), when taking into account those separated by concrete fire breaks or distances of more than 6 m, as detailed in the EA FPP Guidance¹.

9.2 How to use the quarantine area if there is a fire

- 9.2.1 The quarantine area would be used only for segregation of incoming hot loads, waste from within the waste storage area in the WTF building or skips moved to this location for segregation.
- 9.2.2 When a hot load is identified, it will be removed as quickly as possible and isolated in the quarantine area.
- 9.2.3 In the event of a fire requiring the use of firefighting water, the sites drains will be isolated at the site through the deployment of drain mats over the surface water drains. Firewater will be further contained by the deployment of a polyboom across the site entrance in conjunction with the existing perimeter walls. This will prevent the uncontrolled release of contaminated firewater from the site.
- 9.2.4 All skips located on site are mobile and therefore can be relocated as required to provide unrestricted access to drains to deploy the drain mats.

9.3 Procedure to remove material stored temporarily if there is a fire

- 9.3.1 The quarantine area will contain 2 skips during normal operating conditions. The skip can quickly be removed by on site mobile plant. Burning waste can be tipped onto the ground of the cleared quarantine area.
- 9.3.2 In the event of a fire, waste will be moved to the quarantine area as soon as practicable.
- 9.3.3 The location of the quarantine area is in the southeast corner of the site and is indicated on the site plan.

10.0 Detecting fires

10.1 Detection systems in use

- 10.1.1 As part of the daily inspections, staff will check for any evidence of fire and fire risks on the site. During operational hours, the site will always be staffed with site personnel who can raise an alarm if they detect any signs of fire.
- 10.1.2 The waste treatment building is equipped with an automatic fire detection system comprising heat and smoke detectors providing coverage throughout the building during working hours and out of hours. The system is monitored 24 hours per day, 7 days per week by First County Monitoring.
- 10.1.3 In the event that heat or smoke is detected, including outside operational hours, an alarm signal will be automatically transmitted to the monitoring centre. Upon receipt of an alarm notification, First County Monitoring will initiate the site's emergency response procedures and contact the Fire and Rescue Service as appropriate.
- 10.1.4 In addition to the automatic fire detection system, the site is subject to regular out-of-hours inspections by a dedicated security guard. The security guard undertakes hourly patrols of the site, including inspections of all external combustible waste storage areas.
- 10.1.5 To support these inspections, the site utilises an infrared thermal monitoring device capable of identifying elevated temperatures within stored wastes.
- 10.1.6 Should elevated temperatures be identified during routine monitoring, the security guard will immediately notify site management and the designated out-of-hours emergency contact.
- 10.1.7 Where temperatures of 70°C or greater are detected, site management and the nominated out-of-hours emergency contact will be notified immediately. Appropriate actions including turning, separating or quarantining the material will be undertaken to reduce temperatures and minimise the risk of self-heating or fire.
- 10.1.8 Where monitoring identifies smoke, evidence of combustion, rapidly increasing temperatures or any indication that a fire may be imminent, the Fire and Rescue Service will be contacted immediately in addition to site management being notified.
- 10.1.9 The combination of automatic fire detection, remote alarm monitoring, security patrols and thermal monitoring provides a comprehensive system for the early detection and management of fire risks during both operational and non-operational periods.
- 10.1.10 Details of actions in the event of a detector being activated both during operational hours and out of hours are covered in section 12.0.

- 10.1.11 In the unlikely event that a small fire does occur, it would be detected promptly, and the manual hose can be deployed immediately to prevent escalation. Given the low volumes of combustible waste, the containment within movable steel containers, the fast turnover of materials, and the availability of an external hydrant for FRS use, the manual hose represents an acceptable and proportionate fire-water provision for this scale of activity.
- 10.1.12 Out of hours, the site operational contact (details of whom are clearly displayed on the site notice board/signage) will be contacted in the event of a fire. The nominated individual will attend the site as soon as practicable to coordinate the response and liaise with the emergency services as required. Attendance expected within a short timeframe due to proximity of staff to the site.

10.2 Certification and Installation for the systems

- 10.2.1 The design, installation and maintenance of the automated systems will be covered by an accredited third-party certification scheme before the updated operations commence at the facility.
- 10.2.2 The detection system will be installed within 6 months of the permit variation issue.

11.0 Suppressing fires

11.1 Suppression systems in use

- 11.1.1 The fire detection system, described in Section 10.1, in conjunction with the manual suppression system will seek to ensure a fire is put out quickly and with a view that where possible a fire is extinguished within 4 hours. The manual system consists of fire extinguishers which are located inside all buildings and the office on the site. Mains water is available at the building for firefighting purposes by use of a water hose. The waste treatment facility will hold limited amounts of waste within the building as EWL aim to treat and transfer waste to remove it off site as quickly as possible.
- 11.1.2 A manual fire hose is available on-site which is long enough to reach all areas of the facility. Fire extinguishers are not currently located within the external yard; however, extinguishers are positioned within the site office, which provides immediate access to the external yard for firefighting purposes. As per section 10.1.11 the site operational contact will attend the site out of hours promptly to attend the site out of hours to implement the proposed firefighting measures.
- 11.1.3 The total volume of combustible waste stored on site is relatively small, with the largest single combustible waste stockpile being one 40-yard Ro-Ro container (with a volume of approximately 30 m³). The nature of many of the waste types to be accepted and stored at the site are inherently inert and therefore not combustible. Waste will be processed quickly as per our response in question 1, and waste storage time will be short not exceeding 7 work days. Given these limited quantities, types of wastes accepted and short storage periods, the fire risk at the site is considered substantially lower than that of a larger waste operation. On this basis the manual hose provides adequate capacity for initial suppression during the early stages of a fire.
- 11.1.4 In the event that a fire is detected out of hours, the FRS will be alerted by the system described in Section 10.1. In addition to this, the monitoring service will alert an EWL contact who will attend to the site in less than 20 minutes to activate the manual fire suppression system.

11.2 Certification for the systems

- 11.2.1 This is not applicable as there are no automated suppression systems in the WTF building.

12.0 Firefighting techniques

12.1 Active firefighting

- 12.1.1 The site has been designed to allow for active firefighting. This will help allow a fire to be extinguished within 4 hours.
- 12.1.2 On activation of any type of fire detector or manual call point an initial first stage alarm will automatically be initiated. Visual and audible indication will be provided at the fire alarm panel including indication of the zone in which the detection has occurred.
- 12.1.3 The fire alarm sounders will also be activated with a distinctive first-stage intermittent warning sound and administration staff or staff with no fire-fighting training will evacuate the building.
- 12.1.4 Active firefighting means having the resources available at all times to fight a fire – including in the event of a fire. The resources available at the site include:
- Mobile plant for movement of waste (360 grab and mechanical shovel);
 - Staff trained in fire procedures (see Section 2.3);
 - Available water supply (see Section 13.0);
 - Finances to ensure appropriate investment in fire-fighting provisions, training, maintenance and upgrades as necessary.
- 12.1.5 The following process will be adhered to in the event of a fire on site:
- On identification immediately report it to the site office. The acting site manager must be informed immediately;
 - If the fire is in the main office or away from waste, then call out the Fire Service. Then if possible, and without risk to personnel, tackle the fire using the nearest appropriate fire extinguishers or water supply;
 - If the fire is within a waste storage area then if possible, and without risk to personnel, tackle the fire using the nearest appropriate fire extinguishers or water supply. If the fire is uncontrolled then vacate the site;
 - Ensure all site personnel and visitors are accounted for and removed to a safe location. Prevent further access to the site until the emergency is over. Ensure access is clear for emergency services;
 - When all personnel have been accounted for and the emergency services have been informed, contact the Environment Agency to inform them of the situation.

- 12.1.6 The responsibilities of each role on site will be set out in the site procedures. The main fire alarm panel will be located in the Waste Treatment building with a repeater panel located in the main office.
- 12.1.7 If it was obvious that site operatives would be unable to immediately extinguish the fire and the second-stage alarm will be activated, a decision will be made by the appropriate person to also contact the local FRS who would attend the site to carry out the fire fighting.
- 12.1.8 During out-of-hours periods, activation of the automatic fire detection system will transmit an alarm signal to First County Monitoring. The monitoring centre will initiate the site's emergency response arrangements and notify the Fire and Rescue Service. The nominated site contact will also be informed and will attend the site as soon as practicable to support the emergency response.
- 12.1.9 Access routes for vehicles and the FRS are shown on Drawings 1 and 2.
- 12.1.10 The firefighting techniques to be used at the site to extinguish a fire include:
- Separating hot loads from combustible materials by use of the quarantine area;
 - Applying water to cool unburned material and other hazards;
 - Quenching burning material with fire extinguishers or hoses.
- 12.1.11 Staff will be suitably trained in the use of firefighting equipment and will be supervised by the FRS in the event of a fire. During a major fire, the FRS will lead and be supported by site staff.
- 12.1.12 If the FRS were required, fire water supplied from the water sources identified in the section below would then be used to extinguish the fire, which would be facilitated by the attending on-site FRS personnel and fire appliances.
- 12.1.13 Given the available firefighting techniques and means of detecting a potential fire, it is expected that a fire would be extinguished within 4 hours.
- 12.1.14 In the event of a fire, if the site has closed then any incoming waste is to be diverted to a local alternative suitability permitted site.

13.0 Water supplies

13.1 Available water supply

- 13.1.1 The site water supply comes from a public water supply connection and is accessed via mains water supply. In case of small-scale fires, the mains water supply will be utilised. For larger fires requiring the FRS, the hydrant situated outside the site entrance will be used for firefighting purposes.
- 13.1.2 The closest fire hydrant (FH 33649) is positioned at the intersection of Mearclough Road and Fall Lane.

13.2 Show the calculation for your required water supply

- 13.2.1 Section 16 of the EA FPP Guidance¹ provides a calculation based on 300 m³ of waste requiring 2,000 litres of water per minute for a minimum of 3 hours. This represents the worst-case scenario which typically would be the largest pile of waste catching fire.
- 13.2.2 The largest accumulation of combustible waste is 36.6m³. A pile of this size will require a supply rate of 244.1 litres/min and total water requirement of 43,938 litres as shown in Table 13-1 below.
- 13.2.3 The site does not hold a supply of water for firefighting purposes. However, there is access to mains water supply using a hose which can be put into use along with the fire extinguishers, as a first in firefighting. The fire service will have access to the hydrant located immediately outside the site gates, which will provide adequate water to put out a fire involving the largest pile of waste. This hydrant (reference FH 33649) is located approximately 50m northeast of the site, conforms to BS 750 and is regularly maintained by West Yorkshire Fire and Rescue Service.

Table 13-1: Water supply calculation

Maximum pile or container volume in cubic metres	Water supply needed in litres per minute	Overall water supply needed over 3 hours in litres	Total water available on site in litres
36.6	$36.6\text{m}^3 \times 6.67 = 244.1$ litres/min	$244.1 \times 180 = 43,938$ litres (44m ³)	None stored on site – mains water supply using hose. FRS can access hydrant outside facility gates, located ~ 50m NE

14.0 Managing fire water

14.1 Containing the run-off from fire water

- 14.1.1 The site will utilise demountable flood gates approximately 1m in height to seal access points to the waste treatment building in the event of a fire. These gates are designed to be manually installed across the building entrances to retain firewater within the structure.
- 14.1.2 The flood gates will be deployed manually by trained site personal during operational hours. In the event of an out-of-hours incident, they will be installed upon attendance of the nominated site contact.
- 14.1.3 The flood gates are stored externally in a designated area between the site office and the waste treatment building, allowing for rapid access and installation.
- 14.1.4 The flood gates are available on-site and ready for deployment.
- 14.1.5 The building has an internal footprint of 18.7m x 14m. With the floodgates in place, it can hold a total of circa 262m³ which is more than the worst case volume of water from firefighting within the building set out in Table 13-1 above.
- 14.1.6 In the event of a fire requiring the deployment of firefighting water, firewater containment within the external yard will be achieved through a combination of existing site walls and deployable containment measures.
- 14.1.7 The site benefits from perimeter walls which provide physical containment around the majority of the site boundary. The principal potential route for off-site firewater release is via the site entrance and the two surface water drains located within the yard.
- 14.1.8 A 7 m long polyboom will be deployed across the site entrance to provide containment. The barrier is capable of providing a containment height of up to 0.8 m. For the purposes of the firewater containment calculations within this FPP, a conservative containment depth of 0.2 m has been assumed.
- 14.1.9 The two surface water drains located within the external yard will be covered using appropriately sized drain mats to prevent the ingress of contaminated firewater into the drainage network. All skips located on-site are mobile and can be relocated where required to facilitate access to the drains and allow the rapid implementation of containment measures.
- 14.1.10 The site surface water drainage system passes through a silt trap and oil separator before discharging to the foul sewer. Nevertheless, drain mats will be deployed as a precautionary measure to prevent any contaminated firewater entering the drainage system.

- 14.1.11 The combination of perimeter walls, flood gates, polybooms and drain mats provides a robust firewater containment strategy and prevents uncontrolled off-site discharges during an emergency incident.
- 14.1.12 The site will have access to several polybooms which will be located in the designated area between the site office and the waste treatment building. The booms have a 200mm diameter tube each side and using a standard water main i.e. the hose from the site could be filled and provide containment in <5 minutes based on the length of the boom, the volume required and the 15 l/m from the standard hose.
- 14.1.13 The site operational contact will be responsible for arranging the deployment of the fire water boom will be trained in this procedure.
- 14.1.14 Upon confirmation that a significant volume of water is likely to be required for extinguishing a fire on site in the external yard (or in the WTS building if deemed necessary), the following deployment procedure for the fire water booms will be observed:
1. Take the boom from the storage location
 2. Place the boom by rolling the required length, they will be cut to size prior to being used.
 3. Use supplied cable ties to seal the front end of the boom (cable ties will be stored within the site office).
 4. Using a sharp knife (stored within the site office), cut the laid-out section from the remaining roll.
 5. Using the Hose Reel, begin filling the first of the two chambers of the boom being sure to elevate the 'fill' end to prevent the water leaving the tube.
 6. Once the first chamber is filled, repeat in second chamber ensuring the 'fill' end is
 7. kept elevated to prevent escape of water.
 8. When both chambers are full the 'fill' end should be sealed using a cable tie thus completing deployment.
 9. Typically, one side of the roll would be filled which has a 200mm diameter.
- 14.1.15 Drain matt will used to seal the site drainage system and prevent release into the site drains.
- 14.1.16 The external yard has a total surface area of approximately 380 m². Applying a conservative approach, areas occupied by waste storage and operational infrastructure have been excluded, resulting in an effective containment area of approximately 215 m².

- 14.1.17 Using a conservative containment depth of 0.2 m, the external yard provides a firewater containment capacity of approximately 43 m³ (43,000 litres):

$$\text{Volume} = \text{Area} \times \text{Depth} = 215 \text{ m}^2 \times 0.2 \text{ m} = 43 \text{ m}^3$$

- 14.1.18 The waste treatment building provides an additional containment volume of approximately 262 m³ through the deployment of flood gates at building access points.
- 14.1.19 The combined available containment volume therefore significantly exceeds the maximum firewater containment requirement of 44 m³ identified within Table 13-1. This provides a substantial contingency capacity and demonstrates that adequate firewater containment can be achieved without any risk of uncontrolled off-site discharge.
- 14.1.20 The assumed containment depth of 0.2 m is conservative, as the perimeter walls and flood barriers are capable of retaining water to a greater depth. Additional polybooms can also be deployed if required to provide further contingency during a fire incident.

14.2 Assessing risks to groundwater from fire water

- 14.2.1 The site is not located within a source protection zone nor are there any groundwater abstraction points located within 100 m from the site.
- 14.2.2 The site engineering, which includes concrete hardstanding and sealed drainage, reduces the risk of any contaminated waters from escaping into the ground.

15.0 During and after an incident

15.1 Dealing with issues during a fire

- 15.1.1 In the event of a fire, the Site Manager will assess whether the site can remain open. If the site is closed, waste deliveries will be directed to alternative facilities nearby until the site is re-opened.
- 15.1.2 The primary access to the site is via the main access road with entrance gate. Drawing 2 identifies the vehicle access route for external fire services that can be used in the event of a fire.
- 15.1.3 A list of emergency contacts is provided in Appendix A of this report.

15.2 Notifying residents and businesses

- 15.2.1 The closest residential receptor and the closest business are 150 m and 25 m respectively from the site.
- 15.2.2 The Site Manager will notify nearby businesses and residents of a major fire via the following routes:
 - Press release;
 - Website updates;
 - Face-to-face communication (where possible);
 - Social media updates.
- 15.2.3 The criteria for a major fire would be agreed with the FRS.

15.3 Clearing and decontamination after a fire

- 15.3.1 After a fire event, the site will be cleaned and decontaminated, fire water will be sent to authorised facilities for treatment by the use of tankers pumping water from the building. The site drainage system will be cleaned, fire affected waters will be sent to a disposal site. Any fire damaged equipment will be removed and replaced.
- 15.3.2 Once the drainage system has been confirmed clear of contaminated fire water, the polyboom and drain matts will be removed
- 15.3.3 If applicable, skips will be returned to their original storage location and any fire-damaged equipment will be removed or replaced. The quarantine area will be cleared of all skips and/or waste. Any affected waste will be removed off site for treatment or disposal by a third party.
- 15.3.4 The facility does not accept hazardous waste or wastes likely to contain POPs.
- 15.3.5 The procedure for handling, testing and disposal of fire waters is:

- It will be tested for pH and chemical oxygen demand (COD);
- It is expected that fire water will be contaminated and will therefore be tankered off site for disposal by a third party and will not be discharged to surface water or foul sewer. In the case of a specific event in which the operator wishes to discharge fire water to surface water, an appropriate testing regime will be agreed with the EA prior to discharging it.

15.4 Making the site operational after a fire

15.4.1 After a fire, the following steps must be taken before the site can become operational again:

- Site has been cleaned and decontaminated;
- In the case of a pollution event, the EA has been notified;
- All waste storage areas/skips and access areas are clear;
- skips/wastes have been returned to their original storage location and any fire-damaged equipment has been removed/replaced;
- The quarantine area is cleared;
- The FPP has been reviewed and updated to incorporate any lessons learned;
- The Site Manager has agreed with the FRS that the site can operate again.

15.4.2 A full review of the FPP will be carried out in conjunction with the FRS to ensure any lessons learned are carried forward.

16.0 Monitoring, review, reporting and record keeping

16.1 Monitoring

- 16.1.1 Staff working within the waste storage area will be required to be vigilant of any sign of self-combustion or hot loads.
- 16.1.2 The site will undertake periodic fire drills, at least every 6 months. These drills may be co-ordinated with the local FRS team and are used to test fire response procedures. An important part of any such test is to identify if fire procedures are effective and whether there are any improvements which could be put in place. Should improvements be identified, a programme of action with defined responsibilities and timescales will be set.
- 16.1.3 Routines are established for regular checks on all firefighting equipment to ensure they remain available and in good working order should a fire incident occur.
- 16.1.4 The site manager at the time will act as incident controller with supervision from the local FRS. The incident controller is responsible for ensuring that the FPP guidance is followed during an incident.

16.2 Review, reporting and record keeping

- 16.2.1 As part of the site management system this FPP is incorporated within the audit programme. The frequency of audit will be set within the site audit programme. A record of any audit will be made and stored appropriately. Should non-conformances be identified these will be handled in accordance with the site non-conformance procedure which includes appropriate follow-up and a record of the outcome alongside any improvements identified. Where improvements are identified a programme of action with defined responsibilities and timescale will be set.
- 16.2.2 The FPP will be reviewed regularly as part of the EMS review cycle and any updates will be communicated to the relevant people. Following a fire event, a full review of the FPP will also be undertaken in conjunction with the local FRS to ensure any lessons learned are incorporated and communicated to the relevant people and the FPP will be updated to incorporate any recommendations made.
- 16.2.3 Reporting requirements will be defined within incident reporting procedures. These requirements incorporate reporting requirements to the EA (as specified within the permit), to the HSE and other interested parties.
- 16.2.4 The management systems include procedures for record keeping. Any record generated in relation to this plan is held in accordance with this procedure.

Drawings

Drawing 1: Site layout and drainage plan

Drawing 2: Vehicle movement plan

Drawing 3: Ecological receptor plan

Drawing 4: Sensitive receptor plan

Appendix A: Emergency contacts

Contact	Address	Contact Details
Local Police (West Yorkshire Police)	West Yorkshire Police, Richmond Close, Halifax, HX1 5TW	Emergency – 999 or 112 Non-emergency – 101
Local Fire Service (West Yorkshire Fire and Rescue Service)	Halifax Fire Station, Skircoat Moor Road, Halifax, HX1 3JF	Emergency – 999 Non-emergency – 01422 386820
Local Hospital with A&E (Calderdale Royal Hospital)	Salterhebble, Halifax, West Yorkshire, HX3 0PW	Emergency – 999 Non-emergency – 01422 357171
Local EA Office (Leeds)	Lateral, 8 City Walk, Leeds, LS11 9AT	03708 506 506
Operational Contact (Joe Sawrij)	Townend House, 8 Springwell Court, Leeds, West Yorkshire, LS12 1AL	Tel: 07904 164960 On duty Site Manager 07479 229337 Alternate contact Email: admin@ellete.co.uk

Appendix B: Proposed list of wastes

Waste code	Description
Currently Permitted Waste Code as per “Calder Valley Skip Hire, Working Plan, July 2006”	
17 01 concrete, bricks, tiles and ceramics	
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02 wood, glass and plastic	
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03 bituminous mixtures, coal tar and tarred products	
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04 metals (including their alloys)	
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05 soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 08	track ballast other than those mentioned in 17 05 07
17 06 insulation materials and asbestos containing construction materials	
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08 gypsum based construction material	
17 08 02	gypsum based construction materials other than those mentioned in 17 08 01
17 09 other construction and demolition wastes	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
20 MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 01 separately collected fractions (except 15 01)	
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles

Waste code	Description
20 01 36	discarded electrical and electronic equipment other than those mentioned in 200121,200123 and 200135
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 99	other fractions not otherwise specified
20 02 garden and park wastes (including cemetery waste)	
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 02 03	Other non-biodegradable wastes
20 03 other municipal wastes	
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 07	Bulky waste
20 03 99	Municipal wastes not otherwise specified
New Waste Codes applied for in this permit variation application EPR/NP3699ZH/V005	
19 10	Shredding of metal containing wastes
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03
19 10 06	other fractions other than those mentioned in 19 10 05
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11