Fire prevention plan: AREERA Ltd

Plan version: 1
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Site details

Site name: AREERA Ltd: Bury St Edmunds WTEE Storage and Transfer Facility
Site address: External Storage area and Units 5, 6, 8 and 9 Multipark Stanton Bury St Edmunds, Suffolk IP31 2BG
Operator name: AREERA Ltd

This plan is for:

Site Manager
Fire Marshal
Site Operatives
Fire Service
Contractors

Contents

Plans:

Introduction:

This Fire Prevention Plan (also referred to as the FPP) has been drawn up to identify potential fire risk and mitigation measures required to reduce potential fire risks associated with the acceptance, storage and dispatch of waste temperature equipment WTEE) at the company's Suffolk WTEE storage and transfer facility, located at Multipark Stanton Bury St Edmunds, Suffolk IP31 2BG.

The Suffolk WTEE storage and transfer facility is operated by areera Ltd in accordance with its Environmental Permit reference number [to be provided].

1.0 Types of combustible materials

1.1 Combustible waste

Combustible wastes will include incoming waste temperature exchange equipment (WTEE), predominantly in the form of waste fridges and waste freezers and with the potential for other forms of WTEE such as air conditioning units, water coolers, heat pumps, dehumidifiers, dryers and washing machines with heat pumps and ice cream makers. Though fridges will account for almost all of the wastes stored (95 - 100%).

2.0 Using this fire prevention plan

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

This Fire Prevention Plan will be kept in the main staff office in an accessible location and all staff operational staff will know where it is located.

2.2 Testing the plan and staff training

The designated Site Manager/Fire Marshal will be inducted on this Fire Prevention and Mitigation Plan prior to the arrival of the first load of combustible waste on site and their training will be logged.

In line with EA guidance, active firefighting on site focuses on the following drill – which will be tested every two years:

- The use of water or foam (via the fire extinguishers and fire reel hoses)
- Water and/or foam/CO_2 extinguishers to suppress the fire will be utilised by site staff only where there is no immediate risk, where the staff member is sufficiently trained and only as an interim measure before the fire service arrives. A foam and CO_2 fire extinguisher is adjacent to all fire exits. These are checked annually
- The fire-fighting equipment will only be used where it is safe to do so. The user must be aware of the different extinguishing agents and the correct circumstances in which to use them

Vehicles accessing the facility will have fire extinguishers (powder).

3.0 Fire prevention plan contents

3.1 Activities at the site

The facility forms a waste storage installation for WTEE (specifically fridges and freezers) in line with the requirements of RPS375, a regulatory position statement from the Environment Agency to set out acceptable storage arrangements for waste fridges, freezers and wider WTEE: https://www.gov.uk/government/publications/temporary-waste-temperature-exchange-equipment-wtee-storage-due-to-national-treatment-capacity-constraints-rps-375/temporary-waste-temperature-exchange-equipment-wtee-storage-due-to-national-treatment-capacity-constraints-rps-375

Waste will only be accepted where it is within the scope of the environmental permit and the site's waste acceptance procedures. Loads will be checked on arrival and records maintained. Waste that is not permitted, incorrectly described or presents an unacceptable environmental or safety risk will not be accepted and will be managed through the company's rejection procedure.
Fridges and freezers will be handled carefully to prevent damage to cooling circuits, compressors, casings and foam insulation.
Appliances will be kept upright wherever practicable and will not be tipped or handled in a manner likely to damage cooling circuits.
Storage areas will be clearly defined and controlled.
Different waste streams will be appropriately segregated and identified.
Maximum storage quantities and storage periods will be controlled through stock records and routine inspections.
Waste will be dispatched to appropriately authorised downstream facilities.

Fridges and freezers will be delivered to the Bury St Edmunds facility by different hauliers. All incoming loads will be managed through the site waste acceptance procedure. Vehicles will use a calibrated weighbridge so that the quantity of waste received can be accurately recorded.
Each load will arrive with the appropriate completed waste documentation, including consignment notes and hazardous waste documentation where applicable. Documentation will be checked against the physical load and recorded weight before acceptance. Any discrepancies, incomplete documentation or waste that does not meet the site acceptance criteria will be managed through the site rejection and non-conformance procedure. The digital waste tracking system will be implemented from 1st October 2026.

Gas-powered forklift trucks (FLTs) will be used where required for the controlled movement of refrigeration equipment. All forklift drivers will be appropriately trained and competent for the equipment and tasks they undertake. Handling methods will minimise the risk of damage to appliance casings, cooling circuits, compressors and insulation.
All forklifts will be subject to planned servicing, inspection and maintenance. Maintenance and inspection records will be retained, and defects that could affect safe or environmentally responsible operation will be addressed before the equipment is returned to service.

Incoming waste will be delivered via an articulated trailer containing approximately 6 tonnes of fridges/freezers/WTEE (typically 120 units).

The stock will then be moved, via fork-lift truck and stored in blocks compatible with the dimensions and configuration set out in RPS375, i.e. up to a maximum of 3.6m high and 450m^3 volume with a minimum of 3m separation distance between blocks (externally) and 6m internally.

Site plan: External Open Storage Area

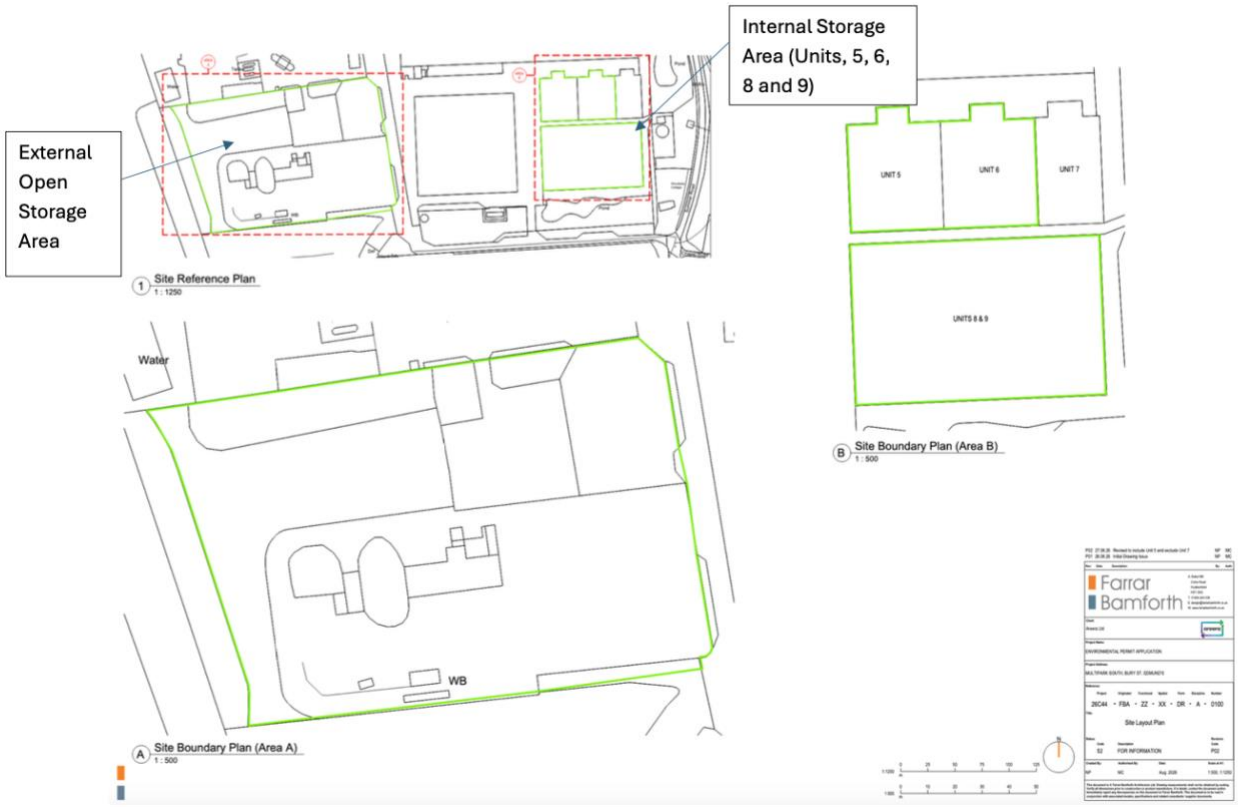

Figure 1: Site Layout Plan

Plan of sensitive receptors near the site (best viewed at 200%)

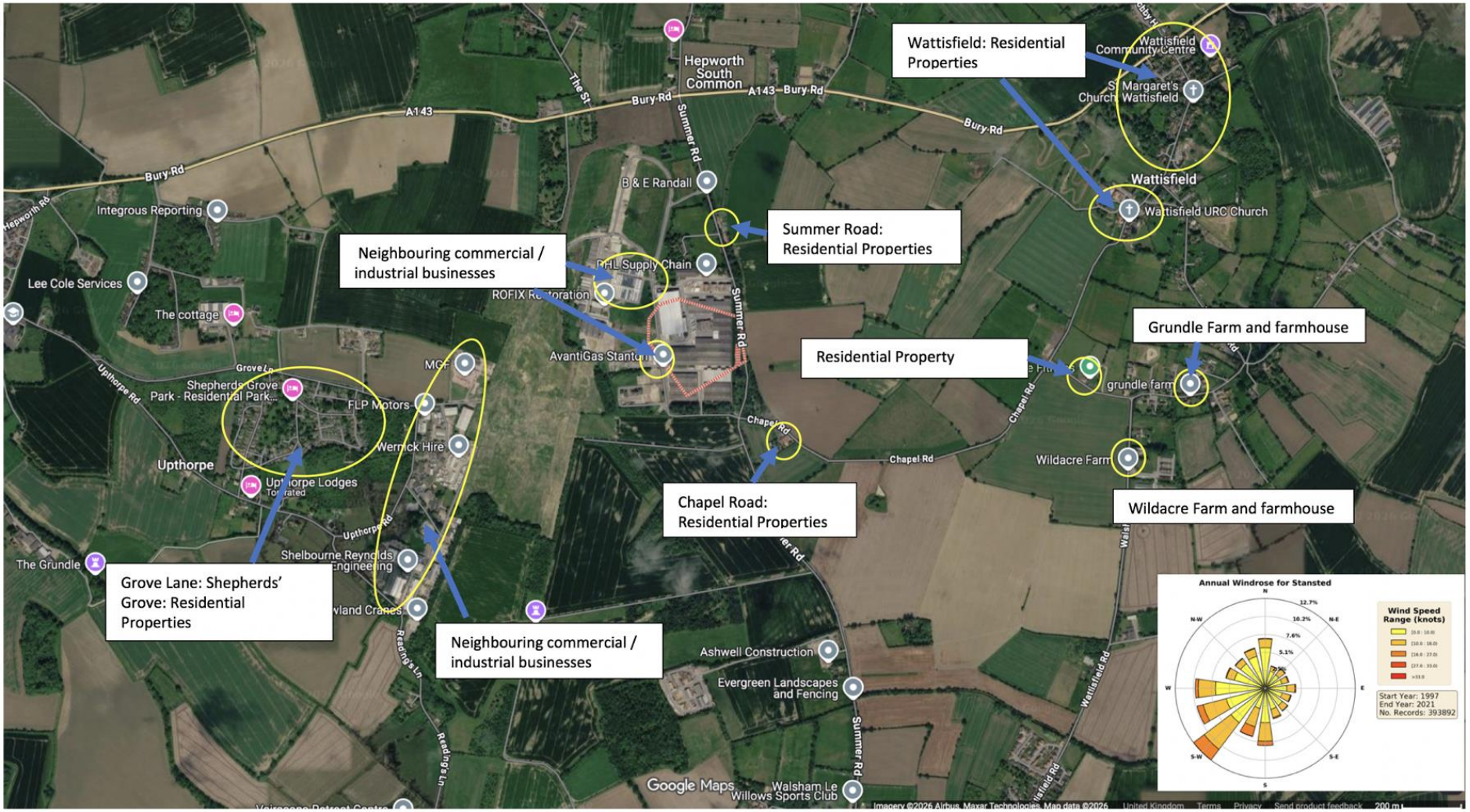

Figure 2: Sensitive Receptors

Drainage Plan (best viewed at 500%)

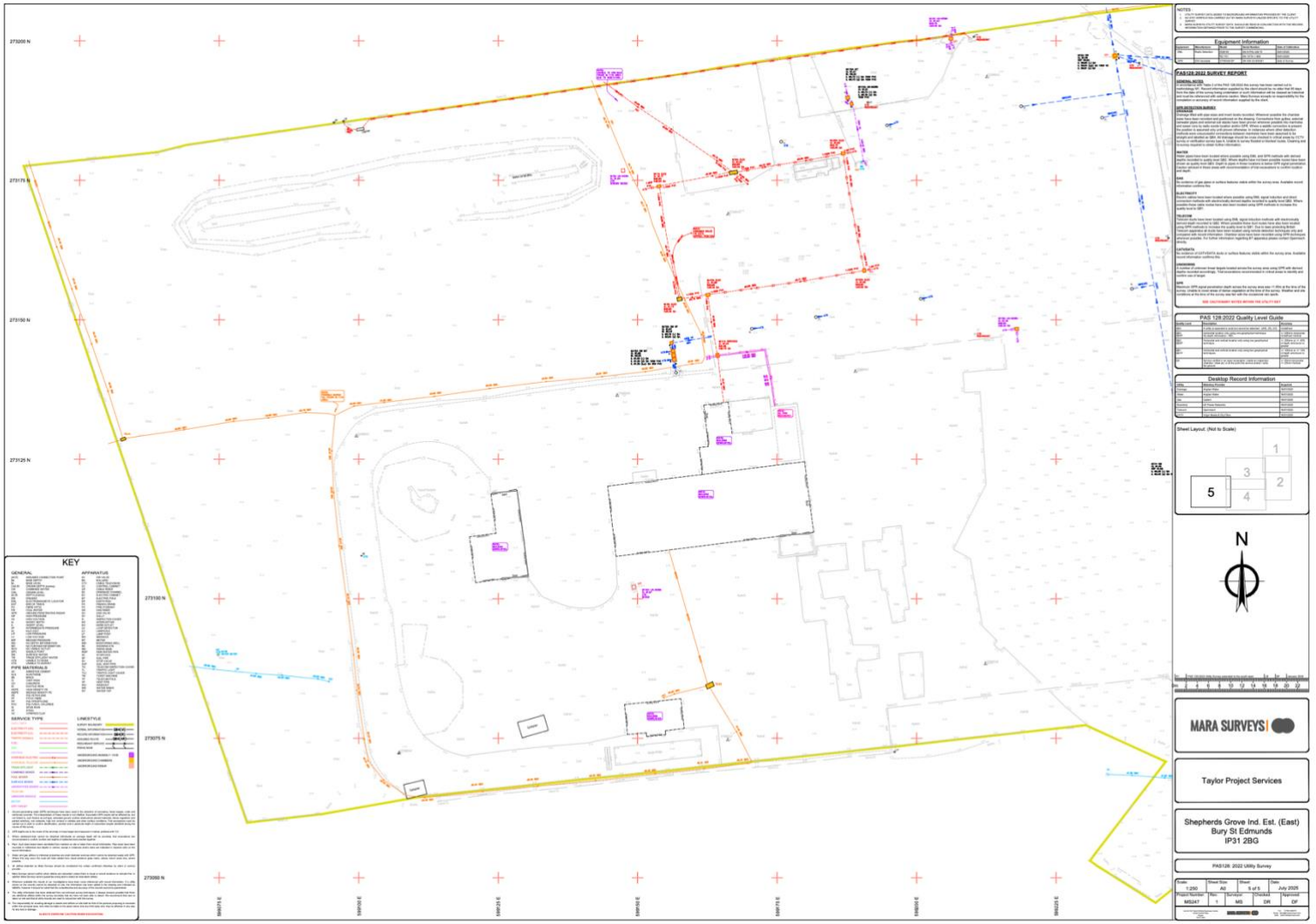

Figure 3: Drainage Plan

4.0 Manage common causes of fire

4.1 Arson

The site has a 2-metre-high steel mesh boundary fence around the perimeter with secure entrance and 24-hour off and on-site CCTV covers internal and external areas of the site.

4.2 Plant and equipment

There is no fixed plant as part of the installation activities; only mobile plant in the form of fork-lift truck(s).

4.3 Electrical faults including damaged or exposed electrical cables

4.3.1 Electrics certification

This industrial park is of modern construction and all electrics are installed by a qualified certified electrical contractor with electrical work to plant and machinery also carried out by a qualified certified electrical contractor.

4.4 Discarded smoking materials

4.4.1 Smoking on site policies

The site operates a no smoking policy with a designated and clearly marked external smoking area located away from buildings and not near any combustible wastes. The daily start and end of shift checks also include a check on the smoking area to ensure any waste cigarette bins are empty and serviced. External contractors and drivers visiting the site are all provided with a list of site rules which includes the no site smoking policy and details where the designated smoking area is located.

4.4.2 Hot works safe working practices

The site carries out risk assessments for all work carried out on site on plant machinery and the fabric of the building, this also includes permits to work and for working at height along with any hot works. Before work commences, the site managers and the contractors carrying out the work agree a detailed action of work and equipment required and allows the site managers to check that the contractors have the correct training, equipment and insurance to carry out the work. This is all documented and signed by each party. In the case of hot works and maintenance on equipment, the work is monitored by the site management before, during, and at completion of the works. In the case of hot works, these are inspected after contractors have left site to ensure that no potential ignition from the works can occur. Hot works are not carried out within 2 hours of the site due to close at the end of a shift to ensure that no heat is still emanating from works carried out. After the conclusion of any hot works, a staff member will be appointed as a fire watch for a period of 2 hours after works are completed.

4.4.3 Industrial heaters

Use of industrial heaters

The site does not have or use any industrial heaters.

4.5 Hot exhausts and engine parts

Fire watch procedures

Site personnel are appointed and daily walkaround (visual) checks are carried out; once during the middle of the working day; once at the end of the working day.

4.6 Ignition sources

As this installation is for waste storage only, with no equipment other than fork-lift trucks, there are no ignition sources.

Over 6m separation distance exists between potential sources of ignition (i.e. the designated smoking area) and the storage of combustible wastes. The gas-powered FLTs will be stored, when not in use, over 6m from the nearest combustible wastes.

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

Any dust build up on plant or around the site is cleaned and removed on a daily basis. Site walk arounds are carried out daily by site management to inspect storage areas; fire exits and fire-fighting equipment, site signage and security aspects to ensure safe site operation.

4.6.2 Reactions between wastes

Only 1 waste type (WTEE) will be accepted into the installation.
These are therefore no unstable wastes and no incompatible waste storage issues.

As a precaution against any non-conforming wastes being accepted (i.e. any items of WTEE that is damaged and/or leaking), a quarantine area (for non-conforming wastes) will be set aside between the two external ISO containers and office/welfare container. This will be located to the south of the external yard area. This will be separated from sources of heat/ignition and the waste storage areas by over 6m.

4.6.3 Deposited hot loads

This is not applicable as incoming waste types do not include hot loads.

5.0 Prevent self-combustion

5.1 General self-combustion measures

The Agency guidance on FPPs suggests that measures to avoid self-combustion may be of relevance for the waste types accepted, if storage ensues for more than 3 months and suggests a swift turnaround of waste stockpiles as a priority to avoid such risks. Where feasible, WTEE will remain on site for less than 3 months, though the allowance as part of RPS375 to store wastes for longer than 3 months will be used where necessary.

5.2 Manage storage time

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

The site operates a computerised stock system, management daily walk arounds and specific areas for the storage of outbound and inbound material to ensure timely removal of material. As stated above, wastes will be stored for less than 3 months where feasible, but, if necessary, for example due to shortage of outlet capacity, the allowance in RPS375 to extend storage beyond 3 months will be employed.

5.3 Monitor and control temperature

Reduce the exposed metal content and proportion of 'fines'

Not relevant to the waste types accepted on site.

5.3.1 Monitoring temperature

The site will use hand-held infrared heat reading equipment. Materials unloaded are checked at the point of unloading for any heat source and, if necessary, any items considered to exhibit temperatures higher than would be expected at ambient levels will be removed to the quarantine area.

5.3.2 Controlling temperature

The nature of the waste types – which do not create heat or exothermic reactions - and the lack of any ignition sources reduces the prospect of temperatures increasing during storage.

5.3.3 Dealing with hot weather and heating from sunlight

Where feasible, during hot weather, the internal storage areas will be prioritised.

5.4 Waste storage configuration

Waste will be stored in blocks of up to of 3.6m high and 450m^3 volume with a minimum of 3m separation distance between blocks (externally) and 6m internally.

6.0 Manage waste piles

6.1 Maximum pile sizes for the waste on site **(based on waste storage, rather than work in progress or material poised for processing).**

Waste stream	**Location** (must match site plan)	**How it is stored** For example this may include piles, bays, containers, skips, racks, bales	**Max. length / m**	**Max. width / m**	**Max. height / m**	**Volume / m^3**	**Max. time it will be stored**
WTEE	External Yard Area (Storge area E5)	Stacked	12.5m	10m	3.6 metres high	10m x 12.5m x 3.6m = **450m^3**	3 months (where feasible)
WTEE	Internal Storage Area	Stacked	12.5m	10m	3.6 metres high	10m x 12.5m x 3.6m = **450m^3**	3 months (where feasible)

For inputs into the installation, there will be no more than 10,000 tonnes of waste stored at any one time (combined across the external open storage area and units 6, 7, 8 and 9.

6.2 Storing waste materials in their largest form

Waste will be stored as intact whole items.

7.0 Where maximum pile sizes do not apply

7.1 Waste stored in containers

7.1.1 Types of containers

Not applicable.

8.0 Prevent fire spreading

8.1 Separation distances

The site layout has been designed to ensure:

- Over 6m separation distance between stockpiles of waste storage blocks (internally)
- Over 3m separation distance between stockpiles of waste storage blocks (externally)
- Over 6m of distance between combustible waste stockpiles and potential sources of ignition
- Over 6m separation distance between the fire quarantine area and storage of combustible waste. The fire quarantine area is situated to the south of the external storage area.
- Over 6m separation distance between the storage of combustible wastes and the site perimeter
- Over 6m separation distance from other buildings
- Over 6m separation distance from other combustible or flammable materials
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This is detailed on the FPP Site Layout Plan (on page 5, above).

The units are served by fire extinguishers.

8.2 Fire walls construction standards

Not applicable – these are open units with layout designed to effect maximum separation distance between combustible wastes and sources of heat/ignition. Wastes are not stored in bays.

9.0 Quarantine area

9.1 Quarantine area location and size

The maximum pile size of combustible waste is 450m^3. This is as detailed in Section 6, above.
The designated fire quarantine area is within the boundary of the site – located to the south of the external storage area and is capable of storing up to half the volume of the largest pile size (i.e. 225m^3). The quarantine area is located more than 6m from the nearest source of combustible wastes/materials.

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

The fire quarantine area will be used, in the event of a fire (or where there's potential for a fire to develop, based on heat sensor checks and visual assessment), to move material that is potentially combustible and adjacent to the (potential) fire source or, where safe and practicable, to move the material that is on fire/potentially on fire.
Movements of adjacent and non-burning/potentially burning material will be via a fork-lift truck. For waste that is potentially ablaze, a fork truck with an attachment will lift, scoop or push any debris to the fire waste holding area. For any fire that has taken hold of a waste stockpile and is not deemed safe to move via fork-lift truck, the material will remain in situ and will be tackled using the fire-fighting equipment described below (fire extinguishers and fire hose reel) and the emergency services will be called to assist.

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

Material that has been stored in the quarantine area will, if it was stored there as a precaution and was not on fire itself, be retained there for 48 hours and then returned to its appropriate storage area. For material that had been on fire, it will be stored until such time that it is both visually and quantifiably (using the heat sensor probe), back to ambient temperature. Arrangements will then be made to dispose of it at a suitably licensed facility, using appropriate transport arrangements.

10.0 Detecting fires

10.1 Detection systems in use

Daily checks are taken of inbound and outbound material noting any rise in temperatures which would be recorded and acted upon, using the designated quarantine area.

10.2 Certification for the systems

All fixed installation monitoring has been installed and is maintained by a UKAS-certified company.

11.0 Suppressing fires

11.1 Suppression systems in use

The fire suppression system comprises fire extinguishers at each of the fire exits. These will be subject to servicing on an annual frequency.

The fire service will be called immediately to alert them of the fire and to request assistance.

The fire suppression system (fire extinguishers) will be used to control/minimise the extent of the fire until the fire service arrives.

Any fires would be managed so that they would have a maximum burn time of 4 hours.

11.2 Role of the Fire Service:

The FRS will take, approximately, the following length of times to access the site from its closest base at Ixworth Fire and Police Station, approximately 6 miles/10-minutes from the site or

Elmswell Fire Station approximately 8 miles/15 minutes from the site.

These timings are relevant throughout the day (in normal working hours and out of hours) as they are full-time/on call fire stations.

The FRS can access the external open storage area and the internal buildings and they will be able to access the fire hoses 24/7. The fire hydrant (located within 100m of the site boundary) will be accessible and operational.

11.3 Out of Hours Cover:

The industrial park is served by a security company.

11.4 Certification for the systems

The fire extinguishers (situated at the designated fire exits) will be routinely checked on an annual basis (in line with the British Standard for Fire Extinguishers).

12.0 Firefighting techniques

12.1 Active firefighting

This modern facility - and the chosen layout – lends itself well to allowing active firefighting.

The fire service will be called immediately to alert them of the fire and to request assistance.

The fire suppression system (fire extinguishers) will be used to control/minimise the extent of the fire until the fire service arrives.

13.0 Water supplies

13.1 Available water supply

The water supply comes from the mains water supply and fire hydrant located less than 100m from the site boundary.

So, based on 2000 litres/minute for 3 hours to tackle a combustible stockpile of 450 cubic metres, then 360,000 litres of water would be required which equates to 360 cubic metres.

Maximum pile 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
450	2000	360,000	360,000

14.0 Managing fire water

14.1 Containing the run-off from fire water

The site is served by a sealed drainage system as detailed in Figure 3, above. In the event of a fire, firewater will be isolated from the drainage system using drain covers and drain seals.

Following any fire (that leads to the generation of firewater), the firewater will be cleared via specialist suction equipment using a specialist contractor and sent for disposal to a suitably-authorised facility for disposal as a hazardous effluent (taking into account the potential presence of persistent organic pollutants (POPs)).

The interceptor will be also fully emptied via suction tanker with the contents disposed of in the same means (as hazardous effluent with potential presence of POPs).

15.0 During and after an incident

15.1 Dealing with issues during a fire

Inbound loads will be stopped where necessary and to ensure that there are no unannounced arrivals of loads to the site. Other permitted waste treatment sites will have agreements to accept material in case of diversion due to fire.

15.2 Notifying residents and businesses

Site management would inform local residents of a fire on site and they would be kept informed of the situation. Residents and businesses near the site can access relevant contact details from the signage at the entrance to the site, displaying site permit information and contact details.

15.3 During and after an incident (firewater management)

The site is served by a sealed drainage system as detailed in Figure 3, above. This will be isolated in the case of a fire and the resultant firewater using a combination of drain seals/covers.

Following any fire (that leads to the generation of firewater), the firewater will be cleared via specialist suction equipment using a specialist contractor and sent for disposal to a suitably-authorised facility for disposal as a hazardous effluent (taking into account the potential presence of persistent organic pollutants (POPs)).

The interceptor will be also fully emptied via suction tanker with the contents disposed of in the same means (as hazardous effluent with potential presence of POPs).

15.4 Clearing and decontamination after a fire

Following any fire on site, the area will then be cleaned by a specialist cleaning company to ensure that no residues remain on site surfacing and any damage to the facility will be rectified as a priority. The Environment Agency will be kept informed throughout this process.

15.5 Making the site operational after a fire

Following a fire on site, and depending on its extent/severity, the following actions will be taken:

- Pumping out of any firewater
- Checking of the integrity of the site
- Ensuring that all firefighting equipment is fit-for-purpose
- Establishing the cause of the fire and ensuring that measures are in place to prevent a reoccurrence