



Fire Prevention Plan

Chertsey Green Waste Transfer Station: Environmental Permit Application

Envar Composting Limited

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Basis of Report

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1.0 Introduction

1.1 Report Context

Envar Composting Limited (Envar) has retained SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) application under the Environmental Permitting (England and Wales) Regulations (as amended) 2016, for the Chertsey Green Waste Transfer Station (WTS) located in Chertsey, Surrey, KT16 0EF.

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's 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 legislation², 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 will therefore be conducted.

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

² Regulatory Reform (Fire Safety) Order 2005



2.0 Types of Combustible Material

2.1 Combustible Waste

Envar currently operate a green waste bulking and transfer operation at Chertsey Green WTS under a T6 Waste Exemption (*Treating Waste Wood and Waste Plant Matter by Chipping, Shredding, Cutting or Pulverising*). The conditions of the T6 waste exemption are due to change which will reduce the waste storage limits below what is commercially viable for this site. It will also significantly restrict the local authority’s ability to use the site, which is key to serving the green waste transfer requirements for the county. The local authority relies on the ability to transfer green waste in bulk to prevent excessive travel and carbon emissions in smaller vehicles. Therefore, Envar wish to apply for a bespoke EP to facilitate the continued green waste bulking and transfer activities on site prior to transfer to suitably permitted composting sites for further treatment. There will be no change to the existing waste types, activities, or storage arrangements at the site as a result of the EP application, and therefore it is not considered that the proposed EP application will increase the risk of the site.

The site will accept up to 35,000 tonnes per annum (tpa) of un-shredded household green waste, from local households and gardeners. A maximum of 500 tonnes of waste will be stored on site at any one time (in two 250 tonne stockpiles). The site layout is illustrated on Drawing 002.

It is proposed that the following waste types will be accepted on site which are defined as ‘combustible materials’ in the EA’s FPP Guidance:

- Green waste.

The waste types accepted at the site are identified in Table 2-1 below.

Table 2-1 List of Permitted EWC Codes

Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 07	Wastes from forestry
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste

2.2 Persistent Organic Pollutants (POPs)

It is understood that POPs will not be present within the waste types to be accepted on site as the site will only accept household green waste from local households and gardeners with a limited waste list of two EWC codes as listed in Table 2-1 above.



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 2-2 below and illustrated on Drawing 002.

Table 2-2 Non-Waste Materials: Storage Arrangements

Type	Storage Location	Storage Arrangement
Diesel Tank	Designated storage area illustrated on Drawing 002	2,000 litre diesel tank surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.
Oil	Designated storage area illustrated on Drawing 002	200-500 litre oil tank surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.

Non-waste materials are stored in bays within a designated area to the east of the site as illustrated on Drawing 002. Non-waste materials are segregated, and not mixed with waste materials or other non-waste materials. They are not covered by the EA’s Guidance or jurisdiction but are described within this EP application for completion to provide wider context of the site.

Non-waste materials stored on site consist of the following:

- PAS100 compost (brought in from partner sites to sell to local businesses only);
- Untreated virgin logs from arboriculture i.e. tree surgeons; and
- Untreated virgin wood chip from arboriculture i.e. tree surgeons.

3.0 Using this FPP

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

A hard copy of this FPP will be kept electronically.

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. Envar will conduct regular training sessions, and fire safety drills, as described in Section 3.2.1 below. Contractors, visitors and drivers working on site will be made aware as part of on-site working procedures, during their site inductions. 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 every 3 years, 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 a 3 yearly basis, or in the event of non-compliance or change to the operations on site which affect fire risk and management.

All members of staff on site will be trained as Fire Marshals and a Fire Marshal is always present on site.

The procedures for fires discovered on site will be provided both in the site's EMS and on site notice boards.

Envar 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 Envar.

Emergency drills will be carried out, recorded and evaluated on a 6 monthly basis. If any issues are found during these fire drills, 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 will be 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 RST 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 operates as a green waste bulking and transfer station for un-shredded household green waste collected from Surrey residents. The site will accept up to 35,000 tpa of green waste. A maximum of 500 tonnes of waste will be stored on site at any one time.

Activities on site will continue to consist of the bulking up, storage, and transfer of household green waste only. The site currently operates under a T6 waste exemption and there will be no change to waste types, activities, or storage arrangements as a result of the EP application. Therefore it is not considered that the proposed EP application will increase the risk of the site.

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:

- **R13:** Storage of wastes.

Site Plan

The site is situated approximately 1.7km south of Virginia Water and approximately 4.3km west of Chertsey. The site is accessed via Kitsmead Lane which runs to the west of the site, and the M3 runs approximately 90m north. The National Grid Reference (NGR) for the site is SU 99323 66260. The site location is illustrated on Drawing 001, and the EP boundary and site layout is shown on Drawing 002.

4.2 Plan of Sensitive Receptors Near the Site

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

The immediate surrounding land consists of open/agricultural land, commercial/industrial premises, and residential properties. The closest residential properties to the site are situated approximately 210m north along Trumps Green Road.

The site is accessed via Kitsmead Lane.

Table 4-1 below summarises the surrounding land uses.

Table 4-1 Surrounding Land Use

Boundary	Description
North	An area of open ground/woodland, followed by the M3, and the residential area of Trumps Green including Virginia Water Football Club.
East	Open/agricultural land, beyond which lies Trumps Farm, Splits Facilities and further areas of open/agricultural land and woodland.
South	Immediately to the south lies an area of open/agricultural land and woodland, and a surface water pond. Beyond this lies a commercial/industrial area including Facilities by ADF, Morris Leslie Plant Hire & Sales, and Severn Trent Green Power West. This is followed by a woodland area, and Chertsey Common.
West	Kitsmead Lane and open/agricultural land followed by a commercial/industrial area including James Mansfield Timber, Pilgrim 2 Workshops, Longcross Studios, and 5 Star Roofcare. Beyond this lies Longcross Estate.

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



4.2.1 Residential Properties

The closest residential properties to the site are situated approximately 210m north along Trumps Green Road. Individual residential properties are located approximately 290m south, and 460m south.

4.2.2 Commercial and Industrial Premises

Several commercial/industrial premises are situated within a 500m radius of the site. Facilities by ADF is situated approximately 180m south, along with Morris Leslie Plant Hire & Sales, and Severn Trent Green Power West approximately 260m and 440m south east respectively. A commercial/industrial area including James Mansfield Timber, Pilgrim 2 Workshops, Longcross Studios and 5 Sar Roofcare lies approximately 490m west at its closest.

4.2.3 Areas of Open/Agricultural Land and Woodland

The immediate surrounding land consists of predominantly open/agricultural land and woodland. Areas are situated adjacent to the site's northern, western, southern and eastern EP boundaries. In addition, Chertsey Common Longcross is situated approximately 500m south of the site.

4.2.4 Local Transport Network

The site is accessed via Kitsmead Lane which runs approximately 150m to the west of the site.

The M3 is situated approximately 90m north and runs in an approximately south west – north east direction. A railway line is situated approximately 210m north, beyond the M3.

The wider local road network is illustrated on Drawing 003.

4.2.5 Surface Water Features

A pond is situated approximately 60m south of the site. In addition, a small pond lies approximately 280m south west, and a further pond lies approximately 390m south east.

Surface water features are illustrated on Drawing 003.

4.3 Ecology

4.3.1 Ancient Woodland

Several areas of ancient woodland are located within a 1km radius of the site, described as follows:

- An area of Ancient and Semi-Natural Woodland lies adjacent to the site's northern boundary;
- An area of Ancient and Semi-Natural Woodland is located approximately 200m north east;
- An area of Ancient and Semi-Natural Woodland is situated approximately 130m north;
- An area of Ancient and Semi-Natural Woodland lies approximately 430m north east;
- An area of Ancient and Semi-Natural Woodland is situated approximately 470m north; and



- An area of Ancient and Semi-Natural Woodland is located approximately 820m south east.

The searches on the Multi-Agency Information for the Countryside (MAGIC) map³ have confirmed that 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;
- National Parks;
- Ramsar Sites;
- Sites of Special Scientific Interest;
- Special Areas of Conservation;
- Special Protection Areas; and
- Biosphere Reserves.

4.3.2 Cultural Heritage

4.3.2.1 Listed Buildings

Multiple Grade II Listed Buildings lie within a 1km radius of the site described as follows:

- Barrow Hills is situated approximately 550m south west;
- Barrow Hills Garden Terrace lies approximately 570m south west; and
- Warren Farmhouse is located approximately 925m north west.

4.3.2.2 Scheduled Monuments

Approximately 670m south west lies the Bowl Barrow 200m West of Barrowhills Scheduled Monument, and approximately 1km south lies the Bowl Barrow 80m North-West of Flutters Hill Scheduled Monument.

Searches on the MAGIC map website have confirmed that there are none of the following within 1km of the site:

- Registered Parks and Gardens; and
- Registered Battlefields.

4.4 Receptors

Table 4-2 and Drawing 001 show the locations of receptors that are considered to be potentially sensitive and could reasonably be affected by the waste management activities.

³ [Magic Map Application \(defra.gov.uk\)](https://magic.defra.gov.uk/), accessed June 2024



Table 4-2: Identified Receptors

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from Site Boundary at closest point (in metres)
Identified receptors within 500m of the EP Boundary as shown on Drawing 003 Environmental Site Setting			
Open/Agricultural/Woodland	Open/Agricultural/Woodland	North, south, east, west	Adjacent
Pond	Surface Water Feature	South	60m
M3	Local Transport Network	North	90m
Kitsmead Lane	Local Transport Network	West	150m
Facilities by ADF	Commercial/Industrial	South	180m
Trumps Green Road	Residential Properties	North	210m
Railway	Local Transport Network	North	210m
Morris Leslie Plant Hire & Sales	Commercial/Industrial	South east	260m
Pond	Surface Water Feature	South west	280m
Residential Property	Residential Properties	South	290m
Pond	Surface Water Feature	South east	390m
Severn Trent Green Power West	Commercial/Industrial	South east	440m
Residential Property	Residential Properties	South	460m
James Mansfield Timber, Pilgrim 2 Workkshops, Longcross Studios, and 5 Star Roofcare	Commercial/Industrial	West	490m
Chertsey Common Longcross	Open/Agricultural/Woodland	South	500m
Identified receptors within 1km of the EP Boundary as shown on Drawing 003 Environmental Site Setting			
Ancient and Semi-Natural Woodland	Ancient Woodland	North	Adjacent
Ancient and Semi-Natural Woodland	Ancient Woodland	North	130m
Ancient and Semi-Natural Woodland	Ancient Woodland	North east	200m
Ancient and Semi-Natural Woodland	Ancient Woodland	North east	430m
Ancient and Semi-Natural Woodland	Ancient Woodland	North	470m



Receptor Name	Receptor Type	Direction from Site	Approximate Distance from Site Boundary at closest point (in metres)
Barrow Hills	Grade II Listed Building	South west	550m
Barrow Hills Garden Terrace	Grade II Listed Building	South west	570m
Ancient and Semi-Natural Woodland	Ancient Woodland	South east	820m
Warren Farmhouse	Grade II Listed Building	North west	North west

4.5 Windrose

A windrose from the Heathrow Meteorological Station located approximately 12km north-north-east of the site is presented in Figure 4-1 below. In reference to the five year average meteorological data acquired from this recording station, the prevailing winds in the site locale are from the west and south west. As such, the potential impact of emissions is likely to be greater to the east and north-east of the site.



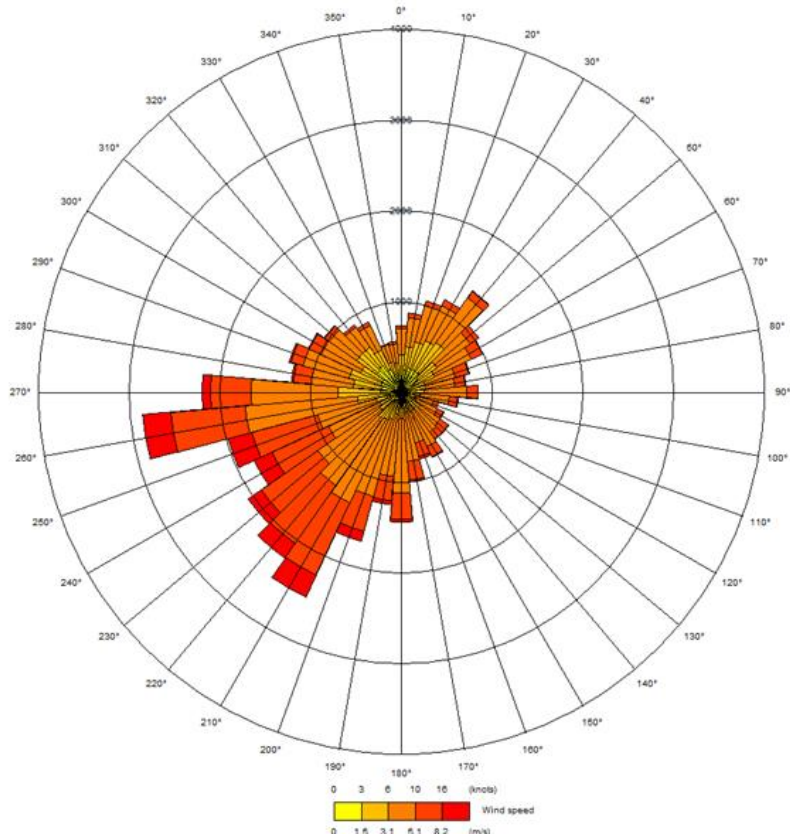


Figure 1 Windrose for Heathrow Meteorological Station (5 year average 2016 – 2020)



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 manned during operational hours by site staff who undertake regular visual inspections of the site;
- The site is surrounded by a security fence, and access gate which is locked outside of operational hours. Plant and site offices are locked outside of operational hours;
- The site benefits from CCTV coverage;
- Comprehensive inspection and maintenance procedures; and
- A visitor sign in system.

All visitors to the site will be required to register in the visitor's book and sign out again on exit. This minimises the risk of unauthorised visitors being present at the site.

The site is operational between 07.00 and 17.00 Monday to Friday during which time site operatives will be present on site. To ensure continuity of service, the site would occasionally be operational on Saturdays, and Sundays, public holidays and over the Christmas and New Year period.

The security measures on site are inspected daily by the operations staff to identify deterioration and damage and the need for any repairs. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable. All inspections, any defects, damage or repairs will be recorded in the Site Diary.

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 on the Site Diary. Records maintained will include inspections and maintenance of doors and locks, breaches of security, investigations and actions taken.

5.2 Plant and Equipment

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

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 in the Site Diary. 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 not used until the equipment can be repaired/replaced.



Storage of mobile plant is detailed in Section 5.2.1 below. All mobile plant vehicles on site will be fitted with integral fire suppression. Envar also have a 100kg trolley mounted extinguisher on site in addition to portable.

5.2.1 Mobile Plant

The following items of mobile plant are held on site:

- Tele handler;
- Loading shovel; and
- Wheeled material handler.

Additional plant and equipment are made available as required.

All items of plant and equipment used on site are maintained in accordance with manufacturer's recommendations.

Outside of operational hours mobile plant is stored within the designated area, a minimum of 6m from any combustible waste material.

5.2.2 Fixed Equipment

No waste treatment activities are undertaken on site. The only waste activities undertaken on site are the storage, bulking up, and transfer of household green waste. Therefore, no fixed equipment is held on site.

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 vehicles onsite are fitted with integral fire suppression; and
- Mobile plant is kept away from combustible waste. This is achieved by allocating areas for mobile plant for storage when not in use.

5.3 Electrical Faults

5.3.1 Electrics Certification

All electrics, and portable cabins 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

Regular safety inspections will be carried out in accordance with Envar's EMS. All portable appliances are tested on an annual basis and daily inspections are carried out as part of the daily walk around checks.

The site runs on a generator, and therefore the electricity supply is switched off over night.

Electrical equipment is visually inspected prior to every use to ensure it is free from obvious damage and fit for purpose. Where remedial work is required Envar will use a suitably qualified electrician.



Any electrical item, or faulty wiring deemed unsafe or that has failed the statutory inspection will be removed from site.

5.4 Discarded Smoking Materials

No smoking is permitted within the EP boundary. A designated smoking area is provided outside of the EP boundary along the site's access road, within a designated shelter.

5.5 Hot Works Safe Working Practices

Due to the nature of the waste operations on site, and the fact that no waste treatment is undertaken, it is very unlikely that hot works will be carried out.

In the unlikely event that hot works are required it will be for maintenance purposes only. When hot works are carried out Envar will operate a permit to work system which will include a 60 minute fire watch by a competent person at the end of the works. No hot works will be undertaken by staff unless they are trained and have the relevant permit to work.

All hot works will be conducted in a cleared area of the site at least 6m away from any combustible wastes. A site operative will perform a continuous fire watch during the hot works and for a minimum of 60 minutes after the work is completed. No hot works will be undertaken within 1 hours of the working day.

5.6 Industrial Heaters

No portable heaters are utilised on site.

5.7 Hot Exhausts and Engine Parts

Vehicles will be turned off when not in use and parked in the mobile plant storage, at least 6m away from any combustible materials.

Flammable/combustible non-waste materials such as oil or fuel are stored in accordance with Table 2-2 above.

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 and recorded in the site diary.

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

The site only accepts un-shredded household green waste collected from Surrey residents and local gardeners.

The site implements strict waste acceptance procedures to check that the characteristics of the waste received matches the information provided during waste pre-acceptance. This will



ensure the waste is as expected and that it can be accepted at the site. The Site Manager is responsible for overseeing waste acceptance, to ensure that procedures are followed by all site operatives and contractors on site.

Batteries will not be permitted for acceptance on site, and only permitted wastes will be accepted. Each load arriving on site will be visually inspected to ensure that the contents correlates with the description on the associated paperwork. Waste is offloaded at the site supervised by qualified site operatives, and visually inspected a second time as it is tipped at the front of the site before being pushed up towards the back wall.

In the unlikely event that unauthorised wastes are identified, they will be quarantined and incompatible wastes will be separated. Any unauthorised (non-permitted) wastes stored temporarily in the quarantine area will be removed from site within a maximum of 36 hours and transferred to a suitably licensed alternative facility.

If batteries are identified in an incorrect waste stream during waste acceptance checks they will be stored in a sealed, weatherproof container 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

Flammable/combustible non-waste materials such as oil or fuel are stored in accordance with Table 2-2 above.

Plant and equipment will continue to be maintained to a high standard in accordance with the manufacturer's recommendations. All mobile plant will be 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. 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 in the site diary, as well as any remedial actions taken.

In the event of any potentially polluting leak or spillage occurring on site 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 nature of the wastes accepted on site. The site does not carry out any waste treatment operations, and only accepts household un-shredded green waste for storage and bulking up prior to transfer to suitably permitted composting sites for further treatment. The following measures will be implemented on site to control the risk of dust:

- The site will operate in accordance with an Emissions (Dust) Management Plan (DEMP);
- All plant and equipment will be 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 6-8 tonnes RCVs to ensure no escape of dust during transit;
- All incoming waste is offloaded near the storage areas to minimise unnecessary handling and transport distance therefore minimising the potential for wind-borne dust;
- Strict waste acceptance procedures are followed to ensure only permitted wastes are accepted on site;
- Green waste is stored on site for minimal periods of time (maximum 5 days), and during summer, and autumn is typically removed within 48 hours;
- Speed limits are implemented on site for all vehicles to minimise the mobilisation of particulates;
- The site benefits from good housekeeping measures. Roads and operational areas are cleaned as necessary to reduce dust emissions;
- Site access roads and operational areas are maintained and repaired to minimise emissions of dust due to poor surfacing;
- Drop heights are minimised wherever possible to prevent emissions of dust; and
- Daily visual inspection of the site and site boundary is carried out by site operatives.

5.12 Reactions Between Wastes

The site only accepts a limited number of un-shredded household green waste EWC codes which are not potentially incompatible with each other.

Waste arriving on site will be subject to strict waste acceptance procedures including visual inspection to ensure it is as expected and can be accepted at the site. Waste is visually inspected a second time as it is tipped at the front of the site before being pushed up towards the back wall.

Waste is stored within the designated storage areas.

Flammable/combustible non-waste materials such as oil or fuel are stored in accordance with Table 2-2 above.

In the unlikely event that unauthorised wastes are identified they will be identified and quarantined, and incompatible wastes will be separated. Any unauthorised (non-permitted) wastes stored temporarily in the quarantined area will be removed from site within a maximum of 7 days and transferred to a suitable licensed facility. Higher risk materials stored in the quarantine area will be removed as soon as practicable.



5.13 Waste Acceptance and Deposited Hot Loads

No burning, reactive / reacting or visibly hot (producing steam or heat) loads will be accepted on site. Waste will be subject to strict waste acceptance procedures including a visual inspection by site operatives upon arrival at the site, and as it is tipped at the front of the site before being pushed up towards the back wall.

In the unlikely event that a hot load is deposited 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 within 36 hours to a suitably licenced facility.

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 minimised;
- Increased vigilance will be communicated to employees;
- If necessary, the site manager may consider procedures such as further reducing storage times during periods of increased heat to reduce the risk of self-combustion.



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, limited waste types and quantities and because no waste treatment is undertaken on site. 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 commercial waste deliveries are checked at the weighbridge or site office on arrival. Checks include both the paperwork and the visual inspection of the load to confirm the waste's description against the relevant accompanying documentation. If the waste is found not to conform it will either be removed to the quarantine area;
- The waste is visually inspected a second time as it is tipped at the front of the site, before being pushed up towards the back wall;
- Storage times are minimised. Waste is stored on site for a maximum of 5 days and during Spring, Summer and Autumn (March to November) waste is typically moved off site within a maximum of 48 hours;
- 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 will be accepted at the site.

Flammable/combustible non-waste materials such as oil or fuel are stored in accordance with Table 2-2 above.

6.2 Manage Storage Time

Envar implement stock management procedures which are effective at limiting the likelihood of self-combustion of materials stored on site.

Under normal operating conditions, waste is transported off site within a maximum of 5 days. During Spring, Summer, and Autumn (March to November) green waste will usually be moved off site within a maximum of 48 hours.

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

The quantity of waste accepted and despatched from the facility is measured via the weighbridge.

A register of the quantities and characteristics of waste accepted at the site is maintained on a computerised system. The system forms the waste inventory and stock control system and includes the following information:

- The date the waste arrived on site;
- A unique reference number;
- Waste pre-acceptance and acceptance information;
- The package type and size;
- The intended treatment or disposal route;



- The nature and quantity of wastes held on site;
- Where the waste is physically located on site;
- Where the waste is in the designated recovery process;
- The staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options;
- Details that link waste to relevant transfer notes; and
- Details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

Suitably qualified personnel carry out daily checks of the site to identify the risks and inspection storage areas and stockpile 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 ensure that a 'first in first out' approach is adopted so that the storage of waste does not exceed the prescribed duration. The site operates on a rolling basis where waste is tipped out at the left and then to the right.

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 accepted on site. Loads are visually inspected upon arrival, and again as they tipped at the front of the site before being pushed up towards the back wall.

Green waste is not known to contain metal fines and therefore is not considered to contribute to the risk of self-combustion.

6.3.2 Monitoring Temperature

The site is continually manned during operational hours, and site operatives are asked to remain vigilant at all times and look out for signs of fire. Staff are trained in how to identify fires and fire hazards on site. Staff also receive training on the use and selection of fire extinguishers, fire safety and all relevant shut down procedures.

On a daily basis, during operational hours, site operatives visually inspect the storage areas for any anomalies, such as visual signs of heat, steam or vapour. Anomalies are actioned immediately by investigation and remedial action will be taken such as rotation of the waste within the storage area or removal of heated waste which will be put in the quarantine area for assessment.

There is no temperature monitoring undertaken on site due to the short storage times, minimal quantity of waste, low risk waste types, and very low risk of self-heating.

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 by using a first-in-first-out principle and all waste is stored for a maximum of 5 days before removal from site;



- Hotspots will be detected and controlled by regular visual inspections of waste storage areas during operational hours;
- The site operates on a rolling basis where waste is tipped out to the left and then to the right and 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

Waste bales are not stored on site, therefore this section does not apply.



7.0 Manage Waste Piles

All incoming waste will consist of household un-shredded green waste. Waste storage areas are discussed further below and are illustrated on Drawing 002.

7.1 Maximum Pile Sizes for the Waste on Site

Waste storage areas are described in Table 7-1 and illustrated on Drawing 002. The back of the site benefits from push walls which extend partially down the two sides. Green waste is tipped out at the front of the site and is inspected before being pushed up towards the back wall. The site operates on a rolling basis where waste is tipped out at the left and then to the right. Due to the nature of the accepted waste (contract un-shredded green waste), it is anticipated that during the working day, the reception waste stockpile will exceed the EA's FPP guidance as multiple vehicles may arrive in a short space of time. The waste will be processed during operational hours and operatives will ensure that the stockpiles are reduced in size, in accordance with the EA's FPP guidance and that they are separated by a minimum distance of 6m before each shift finishes.

Non-waste material types are shaded grey in the table below and are included for completeness but are not subject to the FPP guidance requirements or EA jurisdiction.

Table 7-1 Waste Types, Storage Time and Dimensions

Waste Type	Storage Arrangement	Permitted storage time	Length (m)	Width (m)	Height (m)	Volume (m ³)
Green Waste	2 x Loose stockpiles	7 days	15	12.5	4	750 (250 tonnes)
Untreated Virgin Logs	1 x Bay	N/A	14.5	10.5	4	N/A
Untreated Virgin Wood Chip	1 x Bay	N/A	14.5	10.5	4	N/A
PAS100 Compost	1 x Bay	N/A	14.5	10.5	4	N/A

7.2 Storing Waste Materials in their Largest Form

The only waste activities undertaken on site will continue to be the bulking up, storage and transfer of household green waste. There will be no size reduction activities carried out on site, and waste is always stored in its largest form.

Waste will be stored on site for a maximum of 5 days.



8.0 Waste Stored in Containers

8.1 Types of Containers Used

Waste is not stored in containers, and is stored in loose stockpiles only therefore this section does not apply.

8.2 Accessibility of Containers

Waste is not stored in containers, and is stored in loose stockpiles only therefore this section does not apply.

8.3 Moving Containers in a Fire

Waste is not stored in containers, and is stored in loose stockpiles only therefore this section does not apply.



9.0 Prevent Fire Spreading

9.1 Separation Distances

Waste is stored within two designated stockpiles, one to the left of the site and one to the right as illustrated on Drawing 002. The back of the site benefits from push walls which extend partially down the two sides. Green waste is tipped at the front of the site and is inspected before being pushed up towards the back wall.

Outside of operational hours, a separation distance of 6m will be maintained between the two stockpiles, and the site manager will be responsible for ensuring this is implemented.

9.2 Fire Walls Construction Standards

The back of the site benefits from push walls which extend partially down the two sides.

These are not considered to be fire walls and outside of operational hours a separation distance of 6m will be maintained between the two stockpiles.

9.3 Storing Waste in Bays

Waste is stored in loose stockpiles not within bays. Therefore, this section does not apply.



10.0 Quarantine Area

10.1 Quarantine Area Location and Size

The site will benefit from the availability of a flexible quarantine area within the centre of the site.

The possible location of the site’s quarantine area is illustrated on Drawing 002 and detailed in Table 10-1 below. The area will be able to hold at least 50% of the largest combustible stockpile on site, whilst maintaining a 6m separation distance from other combustible materials.

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.	10.5	9	4	378

The size of the site’s largest stockpile will vary inside and outside of operational hours, and the quarantine area will be sized to hold 50% of the largest waste stockpile outside of operational hours.

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 will allow access by the Fire & Rescue Service (FRS);
- Proximity to flammable materials – the quarantine areas will be situated at least 6m from any potentially flammable material such as waste storage areas.

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 areas. Following an incident, the areas 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 most appropriate quarantine area;
- The movement of the waste will always be overseen 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 a maximum of 36 hours, once it is safe to do so, and (if required) once the waste has been suitably analysed.

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

Due to the low risk nature of the site, minimal waste storage volumes, short waste storage times, and limited waste activities the site implements a manual detection system only which is deemed to be proportionate to the nature and scale of the activities on site. In addition, since the site began operating under the T6 waste exemption, there have been no fires on site within fresh green waste.

The site is operational between 07.00 and 17.00 Monday to Friday during which time the site is constantly manned by operatives who have been trained in the early detection and management of fires. Site operatives visually inspect the waste storage areas for any signs of anomalies, such as visual signs of heat, steam or vapour to ensure the early detection of fires in waste storage areas. Anomalies are actioned immediately by investigation and remedial action will be taken such as rotation of the waste within the storage area or removal of heated waste, which will be put in the quarantine area for assessment. In addition, site operatives are asked to remain vigilant at all times and look out for signs of fire. Staff are trained in how to identify fires and fire hazards on site. Staff also receive training on the use and selection of fire extinguishers, site evacuation procedures, fire safety, and all relevant emergency procedures.

The site benefits from a battery operated CCTV system which is regularly checked by site operatives. If a fire is detected, site operatives would immediately notify the Site Manager and the FRS would be contacted immediately.

11.2 Certification for the Systems

The site implements a manual detection system only, and therefore certification is not required.



12.0 Suppressing Fires

12.1 Suppression Systems in Use

Due to the low risk nature of the site, minimal waste storage volumes, short waste storage times, and limited waste activities a manual fire suppression system is considered to be proportionate to the nature and scale of the activities on site.

All mobile plant vehicles on site will be fitted with integral fire suppression. Envar also have a 100kg trolley mounted extinguisher on site in addition to portable.

Foam, water, carbon dioxide and powder extinguishers are provided on site. The extinguishers are serviced and inspected by a competent contractor and records are maintained.

12.2 Certification for the Systems

The site implements a manual suppression system only, and therefore certification is not required.



13.0 Firefighting Techniques

13.1 Active Firefighting

The closest fire station to the site is Chertsey Fire Station to the east of the site. Using Google directions and mapping⁴, the drive time is approximately 11 minutes and it is approximately 5 miles between the site and the fire station.

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

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

13.1.1 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. Mobile plant will be utilised to pull the affected waste into the open and away from any further waste that could become a light on contact; and
- Depending on the size / nature of the fire the waste will either be:
 - Extinguished immediately⁵ utilising the fire extinguishers or hoses; or
 - Moved to the appropriate quarantine area and extinguished⁶.

Depending on the size, location and nature of the fire the burning waste will be pulled into the dedicated fire prevention and quarantine area following to 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.

13.1.2 Uncontainable Small Fire or Large Fire

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

- The Site Management and FRS will be contacted immediately. The EA will be notified at the first opportune moment;
- 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;

⁴ [KT16 0EF to Chertsey Fire Station - Google Maps](#), accessed July 2024

⁵ 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.

⁶ 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.



14.0 Water Supplies

14.1 Available Water Supply

Sources of water available onsite are:

- The on-board water supply from FRS vehicles;
- Mains water supply and hosepipe (10 litres/second); and
- Hydrant.

14.2 Water Supply Calculation

Outside of operational hours, before the end of the working day the stockpiles will be reduced in size to ensure that they are within EA Guidance. Therefore, the maximum stockpile size outside of operational hours will be 750m³.

Based on a 750m³ stockpile being the largest stockpile on site outside of operational hours, the FPP guidance firewater calculations, it is estimated that approximately 904,500 litres (904.5m³) of water would be required to put out the largest combustible stockpile on the site⁷ as detailed in Table 14-1 below.

Table 14-1 Fire Water Calculation

Maximum pile volume (m ³)	Water supply needed (l/min)	Overall water supply needed over 3 hours (litres)	Total water available on site (l/min)
	Pile volume x 6.7	Water supply x 180	
750	5,025	904,500	Mains water supply and hosepipe (10 litres / second) = 600 litres / minute; and Hydrant.

The pond, located 390m to the southeast, will be utilised in the event of a larger fire incident where additional water is required. Lay flat pipes and a pump capable of delivering the required water supplies (5,000 litres per minute) will be available on site and be deployed in a fire event. The pond is shown on drawing 002.

⁷ Based on a 750m³ stockpile being the largest combustible stockpile outside of operational hours, and it requiring 6.7 litres of water per cubic metre to extinguish. 6.7 * 750 = 5,025 litres/min. 5,025 * 180 = 904,500 litres/3 hours.



15.0 Managing Fire Water

15.1 Containing the Run-Off from Fire Water

Excessive or additional site infrastructure including a fully impermeable surface is not considered to be required for the following reasons:

- Green waste bulking and transfer operations on site are currently carried out under a T6 Waste Exemption. There is no change proposed to the existing waste activities at the site as a result of the EP application, and the only activities carried out on site will continue to be bulking up, and transfer of green waste. It is not considered that the proposed EP application will increase the risk of the site, and as the activities are currently carried out under an exemption which does not require a fully impermeable surface or an on-site water supply additional infrastructure is not considered to be required;
- The site is currently leased from Surrey County Council who are in the process of applying for planning permission for a new large Materials Recycling Facility (MRF) on the site, and therefore Envar will only likely be able to operate from the site for 2-3 years. Due to the short term availability of the site, it is not considered necessary for the site to install additional infrastructure;
- Waste storage volumes will be minimal, with a maximum of 500 tonnes of un-shredded green waste stored on site at any one time with a maximum annual throughput of 35,000 tpa;
- Waste storage times will be short and limited to a maximum of 5 days however during spring, summer and autumn, waste is typically removed within 48 hours; and
- The site will only accept household green waste with a limited proposed waste list of two EWC codes.

In addition, the site is considered to constitute a lower risk to the environment when compared to the Standard Rules SR2021 No 5 permit (*Composting in open and closed systems – waste recovery operation*) as the standard rules permit allows for biological and physical treatment of waste, whilst the proposed site will carry out waste storage operations only. SR2021 No 5 only requires activities to be undertaken on an impermeable surface when the site is located within a source protection zone 1 or 2, and as the proposed site is not situated within a source protection zone impermeable surfacing is not considered to be appropriate. Any water from burning green waste would be of low risk, constituting only water with a small amount of suspended solids with a low nutrient content.



16.0 During and After an Incident

16.1 Dealing with Issues During a Fire

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

16.2 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.

16.3 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 EA and/or 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.

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, and wherever possible, unburnt wastes will be separated from fire damaged piles. If waste pile shave become mixed, then it is likely that the waste will be removed from the stie to a suitably permitted facility.

16.4 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, any burnt material will be transferred off site to a suitably licensed disposal facility.



17.0 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.





Drawings

Appendix A Emergency Contact List

Contact	Phone Number
Facilities by ADF	01932361500
Morris Leslie Plant Hire & Sales - Woking	01276856642
Severn Trent Green Power West London AD Facility	01608677700
Spitz Facilities	02089455728
Old School Cafe	01932873643
Envar Emergency number	01487 800265

