



## FIRE PREVENTION PLAN

### GED Environmental Services Heysham Hazardous Waste Transfer Station

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**Date:**  
August 2022

**Project Ref:**  
SOL1812GED01

VERSION CONTROL RECORD			
Contract/Proposal Number:		SOL1812GED01	
Authors Name:		Adam Stone	
Signature:			
Issue	Description of Status	Date	Reviewer Initials
1	First Submission to the Environment Agency	July 2022	SB
2	Second Submission to the Environment Agency	August 2022	SB

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# 1 INTRODUCTION

## 1.1 Introduction

This document has been prepared by Sol Environment Ltd on the behalf of GED Environmental Services Limited ('GED' hereafter) for the operation of their proposed hazardous waste transfer station at their site in Heysham.

The document provides a structured framework approach in effectively preventing potential fires associated with the processing and storage operations at the site.

This Fire Prevention Plan document (referred hereafter as the 'FPP') has been produced in accordance with the updated Environment Agency's Fire Prevention Plan Guidance (published 29<sup>th</sup> July 2016, updated January 2021).

This Fire Prevention Plan meets the fundamental objective of the FPP Guidance as it demonstrates that the site can:

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

## 1.2 Structure of the Fire Prevention Plan

This FPP has been structured in accordance with the EA Fire Prevention Plan Guidance and considers the following relevant aspects of the facility:

- Managing Common Causes of Fire;
- Preventing Self Combustion;
- Managing Waste Piles;
- Preventing Fire Spreading;
- Quarantine Area;
- Detecting Fires;
- Suppressing Fires;
- Firefighting Techniques;
- Water Supplies;
- Managing Fire Water; and
- During and after an Incident.

### **1.3 Status of the Fire Prevention Plan**

The FPP is a “live” document and will form part of the key environmental management document for the facility. All monitoring procedures, responsibilities and compliance actions will be updated as and when required.

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## 2 SITE BACKGROUND

### 2.1 Site Setting

GED intend to operate a hazardous waste transfer station at The Oil Depot, Field Road, Heysham, Lancashire, LA3 2XU. The facility will be regulated in accordance with the requirements of the Environmental Permitting Regulations, under the conditions of the Environmental Permit once determined.

The Installation will accept and process approximately 35,200 tonnes per annum of hazardous waste, namely waste oils, garage wastes, and associated materials<sup>1</sup>. The site operations will consist of receiving, bulking and storage of both liquid and solid waste materials prior to recovery or disposal off site. It is anticipated that over 10 tonnes per day will be accepted at the site which has a maximum capacity to store 547 tonnes of liquid wastes within static tanks, and approximately 52 drums / IBCs at any one time (~0.8 t per IBC for heaviest wastes).

All waste arriving at the facility will be accepted in accordance with stringent waste acceptance procedures and subject to verification testing.

All waste accepted by the facility will be bulked and/or stored on site before being exported off site for onward treatment, recovery, or recycling. There will be no onsite treatment or use for the waste in any capacity.

The location of the subject Site is shown on Figure A1, Annex A, centred at approximate National Grid Reference SD 40788 60625. The site layout is shown in Figure A2.

The application site is located within an industrial area close to Heysham Ferry Port with industrial and commercial units to the north, south and west and the town of Higher Heysham to the east. The site is roughly rectangular in shape and extends in area to 0.3ha. The site is bounded to the west by Field Road, to the east by an earthen bund and to south by O'Reilly Transport.

Table 2.1 overleaf provides information regarding the surrounding site.

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<sup>1</sup> This figure is based on a weekly throughput of 572 tonnes of liquid waste oils (total rounded up to 30,000t) and 100 tonnes of drummed wastes for a period of 52 weeks per year.

**Table 2.1 Site Setting**

Direction	Description
North	Immediate Vicinity: Harrison & Hutchinson Engineering Within 500m: Footpaths, Beacon, Heysham Head Beyond 500m: Throbshaw Point, Lower Heysham, Heysham Sands, Heysham Flat, Kent Channel
Northeast	Immediate Vicinity: Copse Within 500m: Smithy Lane, Car Park, Residential Dwellings of Higher Heysham Beyond 500m: Cricket Ground, St Peters CofE School, Residential Dwellings of Lower Heysham, Sandylands and West End
East	Immediate Vicinity: Earthen Bund Within 500m: Smithy Lane, woodland, fields, residential dwellings of Higher Heysham Beyond 500m: A589, dismantled railway, Heysham Moss, Fanny House Solar Farm, Agricultural land
Southeast	Immediate Vicinity: Earthen Bund Within 500m: Penrod Way, Commercial / Industrial Units, A589, Residential Dwellings on Rothesay Road Beyond 500m: Trumacar School, Residential Dwellings, Bus Depot, Heysham Golf Course, Railway, Electrical Sub Station, Works, Caravan Parks, Walkers Industrial Estate, Village of Middleton
South	Immediate Vicinity: O'Reilly Transport Within 500m: Penrod Way, Industrial Units, A589, Railway, Nature Reserve Beyond 500m: Heysham Banks, Heysham Golf Course, Ocean Edge Leisure Park, Middleton Sands
Southwest	Immediate Vicinity: O'Reilly Transport Within 500m: Industrial Units, Port Way, Heysham Ferry Port, Heysham Harbour Beyond 500m: Railway, Railway Station, Heysham Nuclear Power Stations and associated infrastructure, Jetties, Outfalls, Red Nab, Middleton Sands, Heysham Lake
West	Immediate Vicinity: C&C Fabrication & Maintenance Ltd Within 500m: Heysham Harbour, Depot, Near Naze Headland, Half Moon Bay Beyond 500m: Heysham Sands, Heysham Lake, Clark Wharf Sandbank
Northwest	Immediate Vicinity: Industrial Warehouse Within 500m: Half Moon Bay, Heysham Sands Beyond 500m: Heysham Lake, Skears, Kent Channel

The Environment Agency flood zone database indicates that the site lies entirely within Flood Zone 1 (low risk) and therefore is considered an area of low probability with regards to flooding (land assessed as having a less than 1 in 1,000 annual probability of flooding (<0.1%).

Although the site is not considered to be highly sensitive in terms of proximity, the facility has been designed to prevent and mitigate the offsite impacts associated with fire as far as practically possible.

The site is considered to be in area of high sensitivity regarding uncontrolled surface water discharges due to the proximity of the coastline of Half Moon Bay.

The wind direction is pre-dominantly from the southwest.

## 2.2 Wastes Covered in the FPP

The site accepts variety of garage wastes, both hazardous and non-hazardous, and solid and liquid. The wastes on site covered by this FPP are non-hazardous and solid wastes. These are listed in table 2.2 below.

Table 2.2: EWC Codes and Types covered in the FPP	
Waste Codes	Description
<b>15</b>	<b>WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>
15 01 02	plastic packaging
15 01 04	metallic packaging
15 01 10*	packaging containing residues of or contaminated by hazardous substances
<b>15 02</b>	<b>absorbents, filter materials, wiping cloths and protective clothing</b>
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths and protective clothing contaminated by hazardous substances
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02*
<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance</b>
16 01 07*	oil filters
<b>16 05</b>	<b>gases in pressure containers and discarded chemicals</b>
16 05 04*	gases in pressure containers (including halons) containing hazardous substance
16 05 05	gases in pressure containers other than those mentioned in 16 05 04
<b>16 06</b>	<b>batteries and accumulators</b>
16 06 01*	lead batteries
16 06 04	alkaline batteries (except 16 06 03)
<b>20</b>	<b>MUNICIPAL WASTES INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>separately collected fractions</b>
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 39	plastics
<b>Total</b>	<b>Aggregate Quantity of all wastes listed above will be less than 35,200 tonnes per annum</b>

## 2.3 Combustible Wastes

At any one time the site will have combustible waste onsite such as rags and oil filters. These are stored in separate segregated IBCs or drums. Oil filters, rags, waste oil, and antifreeze each have their own separate storage areas in the storage yard.

All other wastes, such as packaging wastes or batteries, are stored in any of the 3 'flexible' storage areas. Wastes of these types will only be stored in an empty 'flexible' area, or if the waste already stored



in that area is the same waste type. This ensures no mixing of waste types and is ensured by the pre-booking system and pre-acceptance and acceptance procedures.

The site does not usually bring in non-hazardous waste other than oil filters and rags, therefore it is unlikely that more than 3 of the other EWC waste types acceptable on site will be present at any one time. In the unlikely scenario there are no available areas for incoming wastes then these will not be accepted on site and diverted elsewhere.

Any wastes coming onto site are stored in their original containers or bulked into IBCs. Incoming wastes are stored in IBCs, drums, battery boxes for batteries, and cages for empty gas bottles. No mixing of waste types occurs on site. All non-hazardous and solid waste operations on site take place within the bunded yard area.

## **2.4 Other Combustible Materials**

There are hazardous combustible wastes on site but these are not subject to this FPP. All fuel / oils etc. associated with onsite equipment are stored in the onsite workshop away from any waste.

### 3 FIRE PREVENTION PLAN

This Fire Prevention Plan has been developed to include an assessment of fire risk on site and the measures in place to prevent, detect, suppress, mitigate, and contain fires.

This plan forms part of GED’s management system and sets out the fire prevention measures and procedures that will be put in place and used on site.

Although the FPP includes fire prevention techniques across the site, the focus is on the bunded yard area where non-hazardous wastes are processed and stored.

All staff and contractors working on site will understand the contents of the Fire Prevention Plan and what they must do during a fire.

The Fire Prevention Plan will be kept in the Site Office and all staff will be aware of where it is kept.

Regular exercises will be carried out to test how well the plan works and that staff understand what to do. These exercises will take place every quarter.

#### 3.1 Control of Potential Causes of Fire

The following table identifies common causes of fire and the measures that GED take to reduce the risk.

Table 3.1 Control of Potential Causes of Fire		
Source of Fire	Applicability to Site and Proposed Management Controls	Residual Risk
Arson	CCTV monitoring of the installation. Fully gated site.  Flame detectors are used on site to alert staff to any fire on site.  Site is fully staffed during operating hours and any fire would be immediately identified by the site’s visual inspection checks.	<b>VERY LOW</b>
Plant and Equipment	The site has a regular inspection and maintenance programme which identifies any electrical or mechanical machinery faults which could result in a machinery fire, and the integrity of drums/IBCs so any leaks or spillages can be identified before a fire can occur.  No machinery is parked in the bunded yard area.  All machinery is visually inspected as per GED-E08 Infrastructure Management and Monitoring Programme.	<b>VERY LOW</b>

	<p>Machinery is regularly cleaned to remove any dust, etc. to ensure that this does not accumulate on moving parts. All machinery on site has fire suppression.</p> <p>Site vehicles are fitted with fire extinguishers with the potential for sparks regularly being monitored by site staff.</p>	
Electrical Faults Including Damaged or Exposed Electrical Cables	<p>The risk of damaged or exposed electrical cables is controlled via the regular inspection and maintenance programme.</p> <p>Any electrics on site are fully certified by a qualified electrician.</p>	<b>VERY LOW</b>
Discarded Smoking Materials	There is strictly no smoking in any location on site.	<b>VERY LOW</b>
Hot Works	<p>Where possible, all maintenance and repair work will be undertaken offsite. Where this is not possible (i.e., mobile plant breakdown, etc.) the below procedures apply:</p> <ul style="list-style-type: none"> <li>• If possible, any “hot work” (i.e., maintenance/repair) is only carried out in the workshop on site.</li> <li>• Fire extinguishers will be provided at the scene of any hot work so that they can be used immediately should a fire occur. The extinguishers will be stationed adjacent to the pathway of escape from the work area and not in a place where staff using them could be trapped by a fire.</li> <li>• Potentially combustible materials, including mobile plant hydraulic lines, will be covered by a fire blanket and/or damped down with water as appropriate before hot works start.</li> <li>• A fire watch will be conducted at the scene of any hot work for at least one hour after hot work has finished as sparks from hot works can smoulder for a significant period.</li> </ul>	<b>VERY LOW</b>
Industrial Heaters	No industrial heaters will be used on site.	<b>N/A</b>
Hot Exhausts	<p>There is a daily check and monitoring programme for the site. This process will specifically ensure that all areas are maintained at a sufficient level of cleanliness and housekeeping to ensure that the site does not present a fire risk. This programme will aim to keep levels of dust, loose fibre, and any other combustible materials on or around hot exhausts to a minimum.</p> <p>All site vehicles and mobile plant will be fitted with fire extinguishers.</p>	<b>VERY LOW</b>
Ignition Sources	<p>Any ignition sources on site will be kept at separately from the stored waste on site.</p> <p>No plant or equipment is kept within the bunded yard area.</p> <p>No aspect of the plant or processes requires the use of any naked flames.</p>	<b>N/A</b>

Batteries	<p>Batteries collected and processed on site are stored in appropriate 'battery boxes', waterproof sealed boxes with no chance of liquid ingress or cross contamination.</p> <p>Battery boxes are stored in a separate area to other wastes prior to onward recovery offsite.</p>	<b>LOW</b>
Leaks and Spillages of Oil and Fuels	<p>The prevention of fuels and oil leaking out from drums, IBCs, or plant and equipment will be achieved by the regular inspection and maintenance programme. If there are any leaks, the regular inspections allow this to be dealt with straight away.</p> <p>The programme will specifically ensure that all site vehicles and mobile plant are maintained to an appropriate standard to prevent fuels and combustible liquids leaking or being tracked around the site. Any identified faults will be recorded and repaired by a fully certified mechanic.</p> <p>The bunded yard area will keep any spills or leakages within the area where drainage is protected by an interceptor.</p> <p>Spill kits will be provided throughout the site. All staff will be trained on how to use the spill kit as well as the procedures to carry out in the event of a spillage.</p>	<b>VERY LOW</b>
Build-up of Loose Combustible Waste and Dust	<p>The site has a regular inspection and maintenance programme which will identify any build-up of wastes and dust.</p> <p>This programme will specifically ensure that all areas of the site are maintained to a sufficient level of cleanliness and housekeeping to ensure that the plant does not present a fire risk. This programme will aim to keep levels of dust, loose fibre, and any other combustible materials to a minimum.</p> <p>Machinery is regularly cleaned to remove any dust to ensure that it does not accumulate on moving parts. The site is inspected during daily checks and any build-up of waste and dust would be identified during the inspection.</p>	<b>VERY LOW</b>
Reactions Between Wastes	<p>All waste is accepted on site in accordance with the sites Waste Acceptance Procedures. This ensures that no incompatible or unstable wastes will be accepted on site.</p> <p>All wastes are stored in separate segregated containers with no mixing of waste types occurring.</p> <p>In the unlikely event of incompatible wastes being accepted on site, wastes will be transferred to the quarantine area before removed off site.</p>	<b>VERY LOW</b>

Waste acceptance and deposited hot loads	GED do not receive hot loads.  Contaminants in the waste (e.g., rags) can cause fires. This is reduced by: <ul style="list-style-type: none"> <li>• Visual inspections</li> <li>• Communication to suppliers about contaminants</li> <li>• Operator/driver training to be aware/alert when collecting</li> </ul> Waste is inspected and tested on arrival at the site	<b>LOW</b>
Hot and Dry Weather	The site will be managed in the following ways during periods of hot and dry weather to minimise external heating: <ul style="list-style-type: none"> <li>• re-arranging site layout to provide shade where possible;</li> <li>• minimising storage time;</li> <li>• increasing the frequency of monitoring; and</li> <li>• moving / covering any reflective surfaces to prevent sunlight concentration on waste.</li> </ul>	<b>LOW</b>

### 3.2 Preventing Self-Combustion

#### 3.2.1 Managing Storage Time

All incoming waste is transferred into the bunded yard storage area immediately upon arrival at the site.

Waste will be received and accepted in accordance with the established site waste acceptance and rejection procedures. Loads are then inspected in detail and moved to their appropriate storage area.

Batteries are stored in battery boxes and empty gas bottles are stored in cages. All other waste is stored in the drums they are collected in or decanted into an IBC for that waste type within the appropriate storage area.

Combustible wastes are stored on site for no longer than 6 months in accordance with the latest EA guidance. However, it is highly unlikely waste will be on site for longer than 2 weeks before removal.

The site removes 26 IBCs at a time for exporting and recovery offsite. Each area is managed to ensure full stock rotation is achieved. The site manager will be responsible for managing the rotation of waste.

Waste flow through the site is tracked by labelling pallets of IBCs and drums from when the first was loaded, and pallets are moved to the front of their respective storage areas in age order to ensure all material processed through the site is on a 'first in – first out' principle.

A daily review of the storage areas is made by the Site Manager in accordance with the onsite inspection procedures.

### *3.2.2 Monitor and Control Temperature*

A trained site operative will carry out a visual inspection on site daily in accordance with site procedures to ensure that the storage areas are being managed correctly and that all suppression equipment is working. CCTV across the site is used to monitor for signs of fire such as smoke or flame. This is monitored by staff throughout the day when the yard is unmanned

Flame detectors look across the site to identify any signs of fire. These are fitted with alarms to alert staff to signs of fire.

Temperature monitoring is not practical on site due to the nature of materials and being stored in inert containers.

Ample supplies of water are available on site if needed to cool material containers.

Wastes will be stored in shade where possible during extended periods of extreme hot weather.

Waste is unlikely to be stored on site for longer than the 3 months referenced in EA guidance for heat control, with waste unlikely to be on site for more than 2 weeks. This minimises the requirement for heat control.

All the above measures meet the minimum expectations defined with the EA Fire Prevention Plan Guidance.

## **3.3 Manage Waste Piles**

### *3.3.1 Maximum Pile Sizes*

All waste is stored in containers, therefore maximum pile sizes do not apply. There is less than 1 t of waste per IBC.

Up to 26 IBCs of a single waste type in a single storage area may be on site at any one time, therefore there is less than 25t per waste pile on site at any one time. This is unlikely to be reached however as there is rarely just one waste type on site.

## **3.4 Prevent Fire Spreading**

### *3.4.1 Separation Distances*

All waste is stored in metal drums or IBCs, therefore the full 6m separation distances do not apply as they do for waste piles on other sites.

Different waste types are separated into different storage areas with a 1m separation distance between containers of different waste types.

All plant machinery is kept outside the bunded storage area when not in use.

### 3.4.2 Fire Walls and Bays

There are no fire walls in the storage areas.

## 3.5 Quarantine Area

A quarantine area is set aside for contaminated loads or, in the event of a fire, can be utilised to store at risk waste.

Contained wastes near or adjacent to an ignited waste, or particularly flammable wastes such as oily rags etc., will be moved into the quarantine area if it is safe to do so, minimising the risk of fire spreading.

The quarantine area is located within the main bunded storage yard.

The quarantine area is the same size as the other storage bay areas and therefore meets the need to be capable of holding up to 50% of the largest pile size.

The location of the quarantine area is identified on the site plan provided within Annex A.

## 3.6 Detecting Fires

A trained site operative will carry out a visual inspection on site daily in accordance with site procedures to ensure that all waste storage and processing areas are being managed correctly and that all suppression equipment is working.

Flame detectors are positioned looking out across the site from the building to early detect any fire on site with alarms fitted to alert staff.

Any member of site staff and site security will raise the alarm as soon as they become aware of a fire, including contacting emergency services.

## 3.7 Suppressing Fires

### *Water*

The site has access to mains water in the washdown area adjacent to the storage yard, with hoses able to connect for firefighting purposes.

Further water supplies, if required, may be accessed from the public fire hydrant located approximately across the road from the site on Field Road.

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### *Fire Extinguishers*

All vehicle and plant located on site is equipped with suitable fire extinguishers. This ensures several fire extinguishers are located throughout the site at any time.

There are also numerous fire extinguishers across the site. Refer to the FPP Plan for locations.

A fire extinguisher schedule is kept on file to ensure that all extinguishers are regularly inspected.

### *Training*

All site staff are being trained in reacting to fires which includes:

- Having an appointed and trained fire marshal.
- Fire extinguisher training for all staff.
- Regular practice drills in relation to different scenarios and focus on “breaking the fire triangle” to control fire outbreaks.

## **3.8 Fire Fighting Techniques**

The site has been designed to allow active firefighting.

Upon identifying or being made aware of a fire, the site manager will raise the alarm, alert all present on site to the fire and its location and alert emergency services.

The site will be evacuated in accordance with the site evacuation plan with exception of those staff involved in active firefighting.

All staff, contractors and visitors would follow the Fire Evacuation procedure as included in Section 3.9 below.

Staff will only tackle the fire using the fire extinguishers if it is safe to do so.

In the unlikely event of a fire which has unsuccessfully been extinguished by the sites suppression system, staff are to await the Fire and rescue Service (FRS), who would then take the appropriate actions.

All personnel working on site will be provided training in the Fire Prevention Plan and all associated procedures and controls.

The FPP training will be provided to all new starters and temporary employees working at the site.

FPP refresher training will be carried out to all personnel at least annually.



### 3.9 Fire Evacuation

Fire evacuation points are located at the site entrance and are clearly signposted.

Sites rules are reinforced via use of fire drills and planned response scenarios.

All personnel to follow the instructions of the Fire Wardens and the Site Manager.

A list of trained Fire Wardens is maintained and displayed on the site, together with a list of on-call staff to attend the site in the event of a fire outside of normal operation hours.

The Fire Evacuation Procedure is provided to staff, contractors, and visitors which states:

- On discovery of a fire, immediately operate the fire alarm by using the available air horns and visual signals to ensure the alarm is raised;
- Fire Wardens and staff must only tackle to fire if they are trained to do so, the equipment is appropriate and if their safety or that of others is not compromised.
- Leave the work area by the nearest available exit / safe route and report directly to the assembly point located at the main office.
- Leave quickly but in a calm, controlled and orderly manner. Do not detour to collect personal items;
- Do not re-enter the work area for any reason until authorisation has been given by the Site Manager / Fire Brigade.
- The Site Manager will assess the situation and call the Fire and rescue Service if required.

This document is reviewed and updated annually, or sooner if required. The document details all hazards and the control measures that are in place and / or required to prevent fires.

### 3.10 Water Supplies

In the event of a fire, water can be taken from the mains connection on site, or the fire hydrant located on Field Road. This hydrant is connected to the mains water supply which would provide an additional continuous supply of water in the event of a fire.

Based on the Environment Agency stipulation that 2,000 litres per minute for at least 3 hours is required for 300m<sup>3</sup> of waste, and the worst-case scenario being a fire in the largest stockpile (approximately 30m<sup>3</sup>), then the site will require access to 36,000 litres of water (36m<sup>3</sup>). The mains connections adequately cover this requirement.

### 3.11 Managing Fire Water

In the event of a fire, all contaminated run-off will be contained within the bunded storage area with surface water drainage system closed by the interceptor valve. This will prevent potentially contaminated water entering the offsite surface water system.

The bunded yard is 290m<sup>2</sup> and has 300mm kerb on each side including the 'sleeping policeman' at the yard entrance. Therefore the yard has a capability of holding 87m<sup>3</sup>. This is sufficient capacity to hold run-off created during firefighting activities. Site management will visually inspect the integrity of the kerbing and hardstanding daily as part of their site checks.

The fire water will be removed via tanker from the yard which will transport the water offsite to an appropriate treatment facility.

### 3.12 During and After an Incident

#### *During*

During any firefighting or subsequent clear up operations, any incoming waste will be diverted to an alternative waste processing site.

All nearby residents, businesses and the Environment Agency will be notified during any firefighting taking place on site. Telephone numbers will be stored on site.

#### *After*

Any burnt material will be disposed at an appropriate facility as non-hazardous waste. It is anticipated that the clearing of burnt material will not take long, as the company are confident that any fires will be appropriately controlled and therefore will not result in significant volumes of burnt waste.

All fire water will be captured by the drainage system and attenuation pond and transferred off site via tanker.

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## ANNEX A: SITE PLANS

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## ANNEX B: DRAINAGE PLAN