



Lincoln Recycling Facility Environmental Permit Application

Fire Prevention Plan

GBCTR Limited

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Basis of Report

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1.0 Introduction

1.1 Report Context

A Great British Clean Tech Recycling Company Limited (GBCTR) has instructed SLR Consulting Limited (SLR) to prepare a Fire Prevention Plan (FPP) for the proposed Lincoln Recycling Facility, located at Unit16, Electric Avenue, Witham St Hughes, Lincoln LN6 9BJ.

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 legislation, a responsible person must carry out, or appoint a competent person to carry out, a suitable and sufficient fire risk assessment of the risks of fire to employees and others who may be affected by the site.

1.2 Proposed Facility

The proposed facility will carry out a number of waste recycling activities to treat the following waste streams:

- End-of-life solar panels; and
- End-of-life batteries from solar farms and Electric Vehicles.

Some pre-treatment activities will be carried out externally to the building, but all mechanical treatment will take place within a fully enclosed building. The site is a new-build and benefits from an impermeable surfacing and sealed drainage. Uncontaminated rainfall-derived surface water run-off will be discharged via an attenuation pond to the municipal sewer.

Phase 1 of the site operations will only carry out treatment of end of life solar panels and additional solar panel storage will be located within the building. Phase 2 of the site operations will carry out treatment of batteries. Both phases are considered in this FPP.

2.0 Types of Combustible Material

2.1 Combustible Waste

The site will treat up to 40,000 tonnes per annum (tpa) of end-of-life solar panels and up to 17,000 tpa of end-of-life batteries.

A maximum of 918 tonnes of waste is stored on site at any one time during Phase 1 of the operations and a maximum of 1,800 during Phase 2 operations.

The site's layout for Phases 1 and 2 is illustrated on Drawing 002a and 002b respectively, and the Fire Prevention & Management measures are shown on Drawing 004.

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



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

- WEEE; and
- Batteries.

2.2 Persistent Organic Pollutants (POPs)

The following wastes treated at the facility may contain POPs:

- Plastic components of photovoltaic panels; and
- Cables removed from solar panels.

These wastes are stored in designated areas of the site as shown on Drawing 004.

In the event of a fire on site, GBCTR would make the Fire and Rescue Service (FRS) aware that wastes containing POPs are present on site, and where they are stored. If there is a fire involving POPs waste, then any residue will be segregated and treated following POPs regulations, including any fire water.

2.3 Other Combustible Materials

The site will store non-waste materials that are not covered by the FPP Guidance but are considered in this FPP due to the potential for them to cause or increase the impact of a fire on the site. The materials and their storage arrangements are shown in Table 2-1 below and are illustrated on Drawing 004.

Table 2-1 Non-Waste Materials: Storage Arrangements

Type	Storage Location	Storage Arrangement
Wooden Pallets (reusable)	Service yard adjacent to northern boundary	Stacked in piles

3.0 Using this FPP

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

A copy of this FPP will be kept within the site office and is also available 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. GBCTR will conduct regular Toolbox Talks, and safety days/fire drills. Contractors, visitors, and drivers working on site will be made aware as part of on-site working procedures, during their site induction. This will ensure that all staff and contractors working on site know what they must do:

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

3.2 Testing the Plan and Staff Training

3.2.1 Staff Training and Procedures

All staff will receive training in the use and selection of fire extinguishers, site evacuation, fire safety and all relevant emergency procedures, in addition to training according to their individual duties. This training will be refreshed at least once 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.

Members of staff on site will be trained as Fire Marshals and a Fire Marshal is always present on site, when the site is operational. Fire Marshal training will also be refreshed on a 3 yearly basis.

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

GBCTR 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 GBCTR.

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

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

Regular checks are made of all escape routes and equipment.

The FPP 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 GBCTR 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 proposed facility will be regulated as a multi-activity installation and will carry out the following activities:

4.1.1 Treatment of end-of-life solar panels

Up to 40,000 tonnes per annum of end-of-life solar panels will be processed at the facility consisting of the following steps:

- Temporary storage of end-of-life panels pending treatment;



- Cleaning of solar panels to remove soil and any loose debris;
- Manual and mechanical dismantling of the aluminium metal frames from the panels;
- Shredding of the aluminium metal frames;
- Shredding of the panels;
- Separation of the panel shredding outputs into plastic and metal fractions; and
- Temporary storage of the outputs from both shredding activities pending transfer for recovery at an appropriately regulated facility.

Treatment of solar panels will be carried out using two lines with an approximate total capacity of 4.8 tonnes per hour. A separate unit for shredding aluminium frames is located between the solar panel shredders.

4.1.2 Treatment of end-of-life batteries

Up to 17,000 tonnes of end-of-life batteries will be processed at the facility consisting of the following steps:

- Temporary storage of the end-of-life batteries pending treatment;
- Discharging of the end-of-life batteries;
- Shredding of the batteries;
- Collection of the liquid electrolyte fraction and temporary storage pending transfer off-site for recovery at an appropriately regulated facility;
- Separation of the solid battery shredding outputs into plastic, metal and 'black mass' fractions; and
- Temporary storage of the solid fractions pending transfer off-site for recovery at an appropriately regulated facility.

Treatment of batteries will be carried out in a single line of approximately 2 tonnes per hour.

4.2 Site Plan

The site is centred on National Grid Reference (NGR) SK 8861 8294 within the Indurent Park Lincoln. The site location is illustrated on Drawing 001 Site Location Plan.

4.3 Plan of Sensitive Receptors Near the Site

The surrounding land-use and receptors are identified on Drawing 001.

The site is surrounded by industrial commercial, and residential premises and areas of open land.

Table 4-1 below summarises the surrounding land uses.

Table 4-1 Surrounding Land Use

Boundary	Description
North	Industrial premises
East	Open land and residential properties
South	Open land and the CEMEX Swinderby Quarry



West	Industrial premises and former RAF Swinderby site
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The immediate surrounding land use is described in further detail below.

4.3.1 Residential Properties

There is an area of residential properties located to the northeast and east of the site in Witham St Hughs. The closest residential properties are located approximately 155m from the eastern EP boundary.

4.3.2 Industrial and Commercial Premises

The site lies within St Modwen Industrial Estate and therefore industrial premises lie adjacent to the site to the north and west. Industrial premises include DHL eCommerce Depot and GS Services Ltd to the north and George H Kime to the west.

4.3.3 Agriculture and Areas of Open Space

Agricultural areas and open spaces are located adjacent to the site's eastern and southern boundaries.

4.3.4 CEMEX Swinderby Quarry

CEMEX Swinderby Quarry lies 200m to the site's southern EP boundary.

4.3.5 Educational Premises

Witham St. Hughs Academy primary school is located 325m northeast of the site.

4.3.6 Camp Site

Oakhill Leisure Caravan Park is located approximately 1km southwest of the site.

4.3.7 Major Roads

The site is situated on Electric Avenue which runs immediately to the northeast and west of the EP boundary.

Camp Road lies 125m east and the A46 is approximately 670m northwest of the site boundary.

The wider local road network is illustrated on Drawing 001.

4.3.8 Surface Water Features

The closest surface water feature is a small pond which lies adjacent to the site's northwestern boundary. There is a pond 20m to the northeast of the site and a lake located 610m to the south.

Further surface water features are illustrated on Drawing 001.

4.3.9 Former RAF Site

Former RAF Swinderby site lies 120m west.



4.4 Ecology

4.4.1 European/International Sites

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

4.4.2 Other ecological receptors

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

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

The Environment Agency Conservation Screening identifies 3 local Wildlife Sites and one site of ancient woodland within 2km of the site.

4.4.3 Cultural Heritage

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

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

There is one grade II Listed Building within a 1km radius of the site, located 815m north.

4.5 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.

Table 4-2: Identified Receptors

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from site boundary (at nearest point)
Identified receptors within 1km of the EP Boundary as shown on Drawing 001			

² www.magic.gov.uk accessed September 2025.



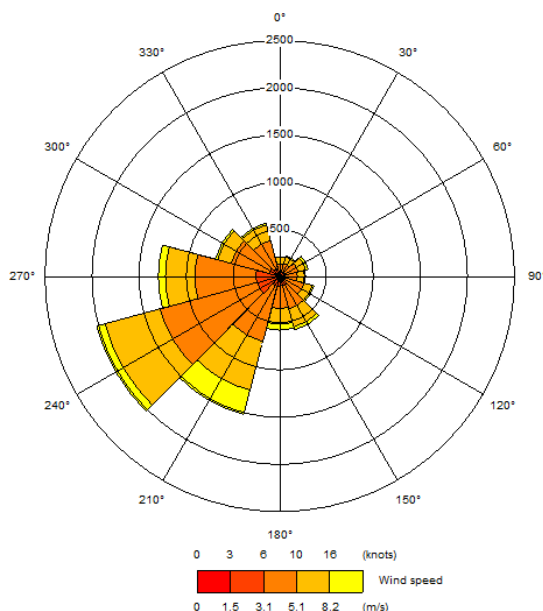
Receptor Name	Receptor Type	Direction from Site	Approximate Distance from site boundary (at nearest point)
St Mowden Park	Industrial premises	North, west	Adjacent
Small pond	Surface water receptor	North-west	Adjacent
Open land	Agricultural receptors	East, south	Adjacent
DHL eCommerce Depot	Industrial premises	North	Adjacent
GS Services Ltd	Industrial premises	North	Adjacent
George H Kime	Industrial premises	West	Adjacent
Electric Avenue	Local transport network	North-east, west	Adjacent
Small pond	Surface water receptor	North-east	20
Former RAF Swinderby Site	Historical site	West	120
Camp Road	Local transport network	East	125
Witham St Hughs	Residential properties	East, north-east	155
CEMEX Swinderby Quarry	Commercial premises	South	200
Witham St Hughs Academy primary school	Educational facilities	North-east	325
Lake	Surface water receptor	South	610
A46	Local transport network	North-west	670
Listed Building	Grade II Listed Building	North	815
Oakhill Leisure Caravan Park	Recreational facilities	South-west	1000

4.6 Windrose

Figure 4-1 shows the wind patterns from 2017 as identified by the Waddington Meteorological Station. The most prominent wind direction is from the southwest and west. Winds coming from other directions are more infrequent. Receptors highlighted in bold in Table 4-2 above are likely to be affected in the event of a fire as they are located in the path of the prevailing wind.

Figure 4-1 Waddington Meteorological Station 2017





5.0 Manage Common Causes of Fire

5.1 Arson

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

- The site is surrounded by a perimeter fence;
- Single access lockable entrance gate locked out of hours;
- External K9 security firm that patrols the Site from 11pm - 5am;
- 24-hour surveillance CCTV coverage available for viewing in Site managers office and security office. Senior management also have 24-hr access to the cameras via a mobile phone app; and
- An alarm system.

All visitors to the site are required to report to the site office and sign in/out. This will minimise the risk of unauthorised visitors being present on site.

The site is operational Monday to Friday 06:00 – 22:00 and between 06:00 and 16:00 on Saturdays. The whole site is closed on Sundays and bank holidays. The site is constantly manned during operational hours and 24 hour CCTV coverage is in place.

5.2 Plant and Equipment

All plant and equipment will be 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.

Planned plant and equipment maintenance is scheduled and carried out by GBCTR's appointed contractors to ensure that all plant and equipment remains fully operational.

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



The Site Manager ensures that inspection of plant and equipment is undertaken on a daily basis by the operator to check for faults and ensure that appropriate safeguards are in place. Inspections are recorded in accordance with the Site's standard operating procedures. The Team Manager also ensures that general housekeeping and cleaning of plant and all equipment on site is carried out regularly. In addition, plant and equipment will be visually inspected prior to every use to ensure it is fit for purpose.

In the event of a failure or suspected fault with an item of plant or piece of equipment, the operator will ensure that the equipment is shut off in a safe manner, removed from service and placed within the vehicle quarantine area until either the service manager authorises its reuse or the authorised repairer confirms it is fit to use. The vehicle quarantine area location is illustrated on Drawing 004.

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

5.2.1 Mobile Plant

The following items of mobile plant will be held on site:

- 2 Battery operated fork lift trucks; and
- 3 Battery operated stackers.

Outside of operational hours mobile plant is stored within designated areas as follows:

- The forklifts and Stackers are parked within the main charging location a minimum of 6m from any combustible waste.

The mobile plant storage area is illustrated on Drawing 004.

5.2.2 Fixed Equipment

The following items of fixed plant are held on site:

- 2 x solar panel processing lines;
- 1 x aluminium frame shredder;
- 1 x battery shredder and separation/sorting line; and
- 1 x battery discharging equipment.

5.2.3 Maintenance of mobile and fixed equipment

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 portable fire extinguishers; and
- Mobile plant is kept away from combustible waste. This is achieved by allocating areas for mobile plant for storage when not in use as illustrated on Drawing 002.



5.3 Electrical Faults

5.3.1 Electrics Certification

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

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

5.3.2 Electrical Equipment Maintenance Arrangements

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

Electrical wiring is tested and inspected every 36 months and circuit completion records are maintained on GBCTR's logging system.

Where remedial work and repairs are required GBCTR uses a suitably qualified electrician.

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

5.4 Discarded Smoking Materials

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

The site's designated smoking area is provided in the car park area, located a minimum of 6m from any combustible waste, as illustrated on Drawing 002. The area is monitored regularly by site operatives.

5.5 Hot Works Safe Working Practices

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

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

5.6 Industrial Heaters

No portable heaters are utilised on site.

The site office will be heated via electrical radiators. The Site Management will ensure that all heating is switched off when an area is not in use.

5.7 Hot Exhausts and Engine Parts

Fork Lift Trucks are electric. Any non-electric vehicles used would be turned off when not in use and parked in the mobile plant storage areas illustrated on Drawing 002, at least 6m away from any combustible materials.



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

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

5.7.1 Fire Watch Procedures

Consideration is given to the high-risk time for hot exhausts (one hour after switching off when dust can settle on hot surfaces) and wherever possible vehicles are given time to cool down prior to site staff leaving site at the end of a shift. A visual site inspection will be completed at the end of the day and handheld mobile infra-red heat detectors will be used to detect heat around any exposed areas of the exhaust systems, and to monitor them for excessive temperatures.

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 accepts end-of-life lithium batteries for treatment. Strict waste acceptance procedures are implemented on site to ensure only permitted battery types are accepted and that batteries are not received in the incorrect waste load.

Lithium batteries are stored within a dedicated, enclosed, and fire-rated area of the site as shown in Drawing 002. This storage zone is physically separated from other waste types and combustible materials.

Batteries are placed in fire-resistant containers such as metal boxes, rigid plastic boxes, or steel containers containing non-conductive absorbent media (vermiculite or sand) to prevent short circuits and isolate heat. Each container and palletised load bears a durable label reading: *Waste Lithium Batteries – Handle with Care – UN 3480* in compliance with ADR (*'Accord Dangereux Routier'* known as Dangerous Goods Regulations in the UK) and the Classification and Labelling of Chemicals (CLP) marking requirements.

All terminals are taped or capped to prevent contact.

Containers are positioned on pallets to ensure airflow beneath and to facilitate safe forklift access.

A minimum one-metre clear space is maintained between all storage rows and building walls to permit inspection and fire-fighting access.

Batteries are inspected upon arrival at the site and are segregated according to the following:

- Intact batteries are grouped by type and stored in labelled, lidded containers.



- Damaged, defective, or recalled batteries are stored individually within sealed metal boxes filled with non-flammable absorbent material such as sand or vermiculite.

The storage area is inspected daily using an infra-red heat detector for evidence of overheating, as well as visible damage or swelling. Any compromised batteries are immediately isolated in a separate containment box with inert filler material. Inspection results are logged and retained on site for audit.

5.9.1 Batteries in ELVs

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

5.10 Leaks and Spillages of Oils and Fuels

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

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 following measures implemented on site:

- 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;
- No dusty waste is accepted on site ;
- The site benefits from good housekeeping measures. Suitably trained site operatives carry out manual/mechanical sweeping at regular intervals throughout the day, to reduce dust generation. Regular visual inspections ensure that any unacceptable levels of litter or loose combustible materials are identified with sweeping and mechanical cleaning carried out as required;



- The site is visually inspected by operatives on a daily basis with a focus on monitoring the level of build up from dusts, fibres and fluff. When it is deemed necessary, a specialist cleaning contractor is engaged to use an extendable hose and brushes to clean the building/elements of the structure.;
- Daily visual inspection of the site and site boundary is carried out by site operatives.

5.12 Reactions Between Wastes

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

Incoming waste is offloaded whilst supervised by suitably qualified site operatives. Any non-conforming waste that is received will either be removed to the designated quarantine area, or the material will be returned to the driver. The site will have procedures for dealing with non-conforming waste including the maximum storage time for waste in the area.

The separated solid waste fractions following treatment are not incompatible with each other. They are stored in designated areas as shown in Drawing 002 and 004.

Liquid waste (electrolyte) is collected and stored in leakproof IBCs in a bunded area external to the main building. The containment bund is capable of containing at least 110% of the volume of the largest IBC within the bund. Bunds are impermeable and resistant to stored materials.

5.13 Waste Acceptance and Deposited Hot Loads

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

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

5.14 Hot and Dry Weather

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

- Concentrated beams of sunlight or glare reflected onto stockpiles through surfaces will be minimised;
- Increased vigilance will be communicated to employees via a Toolbox Talk;
- Temperature checks of waste storage areas will be increased to six times per day.

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 the nature of the waste, effective stock management, the short storage times and because waste is segregated into dedicated storage areas. As such, the site has waste acceptance and stock management procedures which are upheld by all employees at the site.



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

- All waste deliveries are checked at the weighbridge on arrival. Checks include both the paperwork and the full contents of the load. If the waste is found not to conform it will either be removed to the quarantine area or the driver will be required to return the material to the supplier;
- Storage times are minimised;
- Risk factors (e.g. mixing of materials and heat generated during treatment) are reduced by the segregation of waste within separate storage areas;
- Daily inspections of waste storage areas will be undertaken to ensure material is contained within the correct storage area, that stockpile sizes are not exceeded, and that no prohibited items are present;
- No loads are removed without an onsite operative in supervision;
- A quarantine area is kept available; and
- Waste is handled in accordance with a safe system of work. On site personnel will be instructed and trained on the safe system of work.

Only wastes included in the EP will be accepted at the site.

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

6.2 Manage Storage Time

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

Waste storage times are detailed in Table 6-1 below.

Table 6-1 Waste Maximum Storage Time

Waste Material	Waste category	Typical Maximum Storage Time (months)	Advisory Storage time ¹
Solar Panels	WEEE	6	3
Charged Batteries	Batteries	3	3
Discharged Batteries	Batteries	3	3
Dismantled cable / junction boxes	WEEE	3	3
Shredded Frames	Metal	3	Not combustible
Course Glass from shredded panels	Glass	3	Not combustible
Fine Glass from shredded panels	Glass	3	Not combustible
Copper from shredded panels	Metal	6	Not combustible
Plastics from shredded panels	Plastics	3	3
Plastics from shredded batteries	Plastics	3	3
Steel from shredded batteries	Metal	6	Not combustible



Waste Material	Waste category	Typical Maximum Storage Time (months)	Advisory Storage time ¹
Alloy from shredded batteries	Metal	6	Not combustible
Copper from shredded batteries	Metal	6	Not combustible
Black Mass from shredded batteries	Chemicals	3	3
Electrolyte from shredded batteries	Liquid	3	Not specified
Notes:			
¹ Environment Agency Fire prevention plans: environmental permits gov.uk			

All combustible wastes except for solar panels will be stored for a maximum of 3 months, in line with the EA’s FPP guidance. It is proposed that solar panels will be stored up to a maximum of 6 months. As replacement of solar arrays generally takes place during the winter months, waste arisings will be seasonal and the site will need buffer storage to manage this.

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

Suitably qualified site personnel will carry out daily checks of the waste stored at the site to inspect storage areas, identify any risks and ensure storage is compliant with this plan.

GBCTR will liaise with suppliers of solar panels and batteries to ensure that loads are only accepted when there is sufficient capacity to store them. The Site also maintains stock capacity control including daily inventory reconciliation. No material is retained > 6 months without senior site manager sign-off.

6.2.2 Stock Rotation Policy

Arrangements on site will ensure that a ‘first in first out’ approach will be adopted so that the storage of waste does not exceed the prescribed duration. Each incoming pallet is labelled with a batch ID, arrival date/time and operator initials. Storage locations are assigned in sequence to ensure the oldest material is removed first. The inventory system enforces FIFO by:

- Blocking movement requests of newer batches until older batches in the same category/area have been released.
- Generating daily “next to move” pick lists for yard staff.

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



The waste accepted is discrete solar panels or batteries and will not contain metal 'fines'. All waste post-treatment will be stored indoors with no exposure to sunlight.

6.3.2 Monitoring Temperature

Operatives perform and record a visual inspection of all storage bays at the start of each shift and at the end of each shift. Any signs of hot spots, steam, smoke or smells are reported immediately. During period of hot or dry weather the frequency of temperature monitoring will be increased to six times per day.

Handheld infrared (IR) thermometer checks will be carried out on each stored pallet/stack face weekly as a minimum, and daily for any newly received or compacted stock. Checks of the multiple faces of a stack (front, left, right) will be made and core where possible (probe points when safe).

For large piles or bulk bags, measurements will be made at a minimum of 9 locations across the pile footprint (corners, mid-points) to be representative of the whole pile.

A thermal imaging camera sweep of each storage area will be carried out monthly, and whenever a visual inspection indicates concern and when ambient temperature $> 25^{\circ}\text{C}$ / heatwave conditions.

The thresholds for further actions are as follows:

- Alert: for any temperature reading that is $>$ ambient $+ 10^{\circ}\text{C}$ - increase inspection frequency to daily thermal sweeps and establish a 4-hour watch.
- Critical: any reading $\geq 60^{\circ}\text{C}$ (or sustained rising trend) - immediately cordon area, remove adjacent combustible material, transfer the suspect stock to the quarantine area and notify site manager and FRS if ignition risk is assessed as high.

Designated employees are trained to use the infra-red heat guns and undertake visual inspections. All site operatives are trained to be constantly on the lookout for potential ignition sources, or signs of smouldering/smoke.

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

6.3.3 Controlling Temperature

The waste types stored at the Site are not likely to self-heat and the risk of rogue ignition sources being present within the waste is very low given that the waste is received only from solar farms and specified suppliers. Nonetheless, the following actions will be taken to reduce the risk of hot spots and to minimise the risk of self-combustion:

- Waste storage times will be minimised as far as possible;
- Handling methods in place to ensure that panels are not compacted in ways that cause friction;
- A 'first in - first out' approach will be taken for all pre- and post-treatment storage; and
- Monitoring for hotspots will be carried out by twice per shift inspections using handheld infra-red heat guns.



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

Baled waste is not accepted or generated at the site.

7.0 Manage Waste Piles

All waste storage, treatment and transfer will take place on impermeable surfacing.

Waste storage areas are discussed further below and shown on Drawing 002a, 002b and 004.

7.1 Maximum Pile Sizes for the Waste on Site

Combustible waste storage areas are described in Tables 7-1 (Phase 1) and 7-2 (Phase 2) below and illustrated on Drawing 002a, 002b and 004.

Materials highlighted in grey are not subject to the EA's FPP Guidance Requirements but are included in Table 7-1 for completeness.



Table 7-2 Phase 1 Waste Types, Storage Time and Dimensions

Material	Location	How is it stored?	Length (m)	Width (m)	Height (m)	Volume (m ³)	Total tonnage
Solar Panels	External Solar panel storage area	6 x blocks of 6 x 3 pallets stacked 2-high. Blocks are separated with 6m gaps Wrapped in Shrink Wrap (Polyethylene)	15	3	3	135	129.6
		3 x blocks of 5 x 3 pallets stacked 2-high. Blocks are separated with 6m gaps Wrapped in Shrink Wrap (Polyethylene)	12.5	3	3	112.5	54
	Internal storage area	8 x blocks of 6 x 3 pallets stacked 2-high. Blocks are separated with 6m gaps	15	3	3	135	172.8
Dismantled cable / junction boxes	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	6.5	1	4	6.5	5.4
Shredded Frames	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	36	1	4	36	60.75
Course Glass from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	260	1	4	260	371.25
Fine Glass from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	51	1	4	51	101.25
Copper from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	1.69	1	4	1.69	6.75



Material	Location	How is it stored?	Length (m)	Width (m)	Height (m)	Volume (m ³)	Total tonnage
Plastics from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	5	1	4	20	16
General Waste (plastic packaging and wood)	External waste storage area.	Large metal wheeled bins with lid	6.3	2.4	2.75	42	variable

Table 7-2 Phase 2 Waste Types, Storage Time and Dimensions

Material	Location	How is it stored?	Length (m)	Width (m)	Height (m)	Volume (m ³)	Tonnage
Solar Panels	External Solar panel storage area	6 x blocks of 6 x 3 pallets stacked 2-high. Blocks are separated with 6m gaps Wrapped in Shrink Wrap (Polyethylene)	15	3	3	135	129.6
		3 x blocks of 5 x 3 pallets stacked 2-high. Blocks are separated with 6m gaps Wrapped in Shrink Wrap (Polyethylene)	12.5	3	3	112.5	54
Charged Batteries	External Battery Storage Area	In fire-resistant and weatherproof metal or plastic containers or steel containers containing non-conductive absorbent material. Containers are stored on pallets to facilitate access, maximum of 2 pallets in height. Each row of pallets separated by 0.5 – 1m to enable access for inspection and removal.	12.2	4.9	2.35	140.5	170



Material	Location	How is it stored?	Length (m)	Width (m)	Height (m)	Volume (m ³)	Tonnage
Discharged Batteries	External Battery Storage Area	Within two banded shipping containers	12.2	4.9	2.35	140.5	170
Dismantled cable / junction boxes	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	6.5	1	4	6.5	5.4
Shredded Frames	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	36	1	4	36	60.75
Course Glass from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	260	1	4	260	371.25
Fine Glass from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	51	1	4	51	101.25
Copper from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	1.69	1	4	1.69	6.75
Plastics from shredded panels	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	5	1	4	20	16
Plastics from shredded batteries	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	80	1	4	80	47.25
Steel from shredded batteries	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	60	1	4	60	67.5
Alloy from shredded batteries	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	121	1	4	121	202.5



Material	Location	How is it stored?	Length (m)	Width (m)	Height (m)	Volume (m ³)	Tonnage
Copper from shredded batteries	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	17	1	4	17	67.5
Black Mass from shredded batteries	Internal Racking	Within 1 ton bulk bags placed on pallets within racking bays	168	1	4	168	337.5
Electrolyte from shredded batteries	Externally stored within bunded and vented storage container, contained within a fire wall protection	500-litre palletised N ₂ blanketed IBC containers	1.2	1	0.75	0.9	~ 1
General Waste (plastic packaging and wood)	External waste storage area.	Large metal wheeled bins with lid	6.3	2.4	2.75	42	variable



7.2 Storing Waste Materials in their Largest Form

Waste is stored on site in its largest form before processing, and minimal waste processing activities are undertaken on site. Once processed the treated material is taken off site for further recovery as soon as possible (within a maximum of 12 weeks).

8.0 Waste Stored in Containers

8.1 Types of Containers Used

The site stores waste in the following containers:

- Metal containers (general/packing waste);
- Dolavs (batteries);
- IBCs (liquid waste); and
- Flexible Intermediate Bulk Containers (FIBC) bulk bags (separated fractions post shredding).

8.2 Accessibility of Containers

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

8.3 Moving Containers in a Fire

In the event of a fire, containers can be moved to reduce the risk of fire spread. The affected container would be moved immediately by site operatives, using appropriate mobile plant, to the quarantine area. The plant and equipment needed to move a skip/container is always available should one need to be moved.

9.0 Prevent Fire Spreading

9.1 Separation Distances

Waste is stored within the designated storage areas as illustrated on Drawing 004. All combustible waste piles are separated by at least 6m or with a fire wall.

9.2 Fire Walls Construction Standards

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

- Have a fire resistance period of at least 4 hours;
- Have the highest fire resistance classification (class A1) under EN 13501-1:2018;
- Bay walls are constructed using fire resistant intumescent sealant; and
- All bay walls are constructed 6 blocks high, to achieve a safe height of 4.8m. Waste is stored to a maximum of 3.8m so a freeboard of 1m is maintained to minimise the risk of fire spreading from bay to bay.



9.3 Storing Waste in Bays

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

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

10.0 Quarantine Area

10.1 Quarantine Area Location and Size

The site will benefit from the availability of two designated temporary quarantine areas. The first is within the building and the second is in the service yard.

The location of the site's quarantine areas is illustrated on Drawing 004 and detailed in Table 10-1 below. Both areas will benefit from sealed drainage and will be large enough to hold at least 50% of the largest combustible stockpile on site, whilst maintaining a 6m separation distance from other combustible materials, and buildings. The largest stockpile inside the building is black mass (168m³) and the largest stockpile in the external service yard is batteries (140.5m³).

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 (1) – inside building	Dousing of burning/smouldering waste and/or separation of unburnt waste. Separation of non-conforming waste prior to removal from site.	10	5	2	100
Fire Prevention and Non-Conforming Waste (2) – service yard	Dousing of burning/smouldering waste and/or separation of unburnt waste. Separation of non-conforming waste prior to removal from site.	10	4	2	80

The locations of the quarantine areas are 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);
- The quarantine areas are situated at least 6m from any potentially flammable liquids on site such as electrolyte tanks; and
- Firewater containment – any water used to extinguish a fire within waste moved to either of the quarantine areas would be contained in line with the measures outlined in Section 15 below.



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

In the event of a fire incident, 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 48 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

11.1.1 Proposed Detection System

The site will benefit from an automatic fire detection system, which consists of the following elements:

- Fire alarm;
- Heat and smoke detectors within the building; and
- CCTV with thermal sensors in external storage areas.

Details of the system will be provided once procurement has taken place.

The alarm is monitored centrally 24 hours a day 365 days a year by a remote monitoring system. If an alarm was triggered, inside of operational hours, site operatives trained in the management of fire incidents will assess the cause of the alarm and implement the appropriate actions.

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

Inside of operational hours, the site is constantly manned by site operatives and at least one Fire Marshal will be present on site. Fire Marshals are trained in the detection of fires and



therefore will provide an additional level of management for fire detection. Their responsibilities include monitoring any activity that may give rise to the risk of fire including:

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

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

11.2 Certification for the Systems

The site's detection system is yet to be procured but will be certified to British Standard BS5839.

12.0 Suppressing Fires

12.1 Suppression Systems in Use

12.1.1 Automatic Fire Suppression System

An automatic fire suppression system fed by an on-site water tank will be used on site. This will use water cannon to target the source of a fire. Details will be provided when the system has been procured.

12.1.2 Manual Fire Suppression

The locations of all fire extinguishers, and hose reels on site will be illustrated on Drawing 004 once the Site is operational. The extinguishers will be serviced and inspected by a competent contractor and a register is maintained on the Site's equipment register and maintenance schedule. Fire Marshalls will carry out visual checks on extinguishers and hose reels to confirm their presence and that they have not been tampered with and records of inspections are kept.

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

12.2 Certification for the Systems

The design, installation and maintenance of the site's fire protection system will be provided by the contractor once procured and will meet appropriate British Standards.



13.0 Firefighting Techniques

13.1 Active Firefighting

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

The closest Fire Station is Brant Broughton Community Fire Station operated by the Lincolnshire Fire & Rescue Service (FRS), located approximately 6 miles away. The drive time is approximately 20 minutes to the Site.

The site's operational hours are described in Section 5.1 above. A locked FRS Information Box will be fitted to the outside of the Site's gate which will contain site keys, a copy of the FPP, and Site Layout Plan. The code to the box will be provided to FRS to ensure that they will be able to gain immediate access to the site outside of operational hours. The location of the box is on the main warehouse gate and is easily accessible for the office entrance.

13.1.1 Fire Extinguishers and Fire Hoses

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

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

13.1.2 Small Fire

As detailed in Sections 11 and 12 above upon detection of a heat spot the remote operator will activate the directed firefighting process using the cannons and cameras.

During operational hours, suitably trained site operatives will investigate the hotspot immediately and determine the best course of action. Potential courses of action could include:

- Utilising mobile plant to pull the affected waste into the open away from other waste that the fire could spread to;
- Depending on the size / nature of the fire the waste will either be:
 - Extinguished immediately³ utilising the fire extinguishers or hoses; or
 - Moved to the appropriate quarantine area and extinguished⁴.

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

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

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

³ 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.

⁴ 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.



13.1.3 Uncontainable Small Fire or Large Fire

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

- The automated system will activate the firefighting process using the cannon and cameras;
- The Site Manager and FRS will be notified immediately and the EA as soon as practicable;
- Following arrival of the FRS, all site staff will take instructions from the FRS which may include any of the following:
 - If possible, waste that is unburnt will be dampened down to prevent the fire from spreading further;
 - If possible, unburned material will be separated from the fire using heavy plant;
 - 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
- 1 x 168m³ sprinkler / firewater tank located near the site entrance.

Sources of water offsite include fire hydrants located:

- Ca. 100m to the north-west of the main access to the Site on Electric Avenue, reference 53.147562 – 0.674842; and
- Ca. 100m to the north-east of the Site on Electric Avenue, reference 53.148424 – 0.671687.

14.2 Water Supply Calculation

The largest stockpile of combustible waste stored on site during operational hours will be the discharged battery storage area near the north-western corner of the Site. The volume of this stockpile is 140.5m³.

Based upon the methodology for calculating firewater requirements provided in EA's FPP guidance, it is estimated that approximately 168,684 litres of water would be required to put out the largest combustible stockpile on site.⁵ The firewater requirements and availability is summarised in Table 14-1 below.

⁵ Based on a 140.5m³ stockpile being the largest combustible pile on site and it requiring 6.67 litres of water per minute per cubic metre to extinguish. $6.67 * 140.5 = 937.14$ litres/min. $937.14 * 180 = 168,684$ litres/3 hours.



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)
140.5	937.14	169,000	>940

15.0 Managing Fire Water

15.1 Containing the Run-Off from Fire Water

The site’s drainage system is illustrated on Drawing 004.

During a fire, it is not anticipated that 169,000 litres of firewater run-off would be generated as typically up to 50% would evaporate as part of the firefighting process. However, in a worst case, scenario if 169,000 litres of firewater water run off was created, it would be contained on site as described below.

In the event of a fire, the outlet valves on both the foul and clean drainage systems would be closed by a nominated site operative to prevent any water from leaving site via the drainage systems. Outside of operational hours, in the event of a fire, the central monitoring centre would contact the on call GBCTR manager who would attend site immediately and close the drainage outlet valves.

Given the size of the site and that all waste storage areas benefit from impermeable surfacing and sealed drainage, the modest ‘worst case’ 169,000 litres of run-off can be contained withing the site and drainage system.

As the floor area of the building is 9,750 square metres, in the event of a fire in the building, firewater run off would be easily contained within the building (less than 2cm depth) as well as the internal and external drainage system.

Similarly, any firewater in the external yard would be collected in the site drainage system and contained withing kerbing around the site. A temporary boom would be installed across the roadway if necessary, to prevent water from leaving the Site. In addition, emergency flood kits will be held on Site as an additional precautionary measure.

Once contained, the water would be stored until it is tested, and either pumped to the foul drainage system if it meets the conditions of the discharge consent, or tankered off site for treatment at an appropriately regulated facility.

16.0 During and After an Incident

GBCTR’s EMS will include a Business Continuity Plan which will include contingency measures for incidents and accidents at the facility.

Depending on the severity of the incident, supplies of end-of-life panels and batteries may be suspended until the site is fully operational and storage capacity has been re-instated.

16.1 Dealing with Issues During a Fire

The site will not continue to accept waste if there is an active fire on site. Waste producers will be notified 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 once the site is operational. 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, as described above.

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

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

The Site Management will determine what decontamination measures will be required to be carried out proportionately to the impact caused by the fire. The period of time taken to restore the site or affected part of the site to operational status will be determined by the nature and extent of the fire. If the affected area does not impact the rest of the site's operation, operations will re-start as and when appropriate.

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, the material will be transferred off site to a suitably licensed disposal facility.

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

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

Drawing 002a	Phase 1 Site Layout
Drawing 002	Environmental Receptors
Drawing 004	Fire Prevention Plan

