

Fire Prevention Plan

Manchester

1.0 FIRE PREVENTION PLAN PURPOSE & OBJECTIVES

The Fire Prevention Plan (FPP) is a separate document that in conjunction with the Emergency Contingency and Accident Management Plan forms part of the Environment Management System. The FPP sets out the fire prevention measures and procedures in place on site to prevent a fire from occurring and detect, suppress and mitigate in the event one breaks out.

The fire prevention measures in this guidance have been designed with regard to EA Guidance to meet the 3 key objectives:

PREVENTION - minimise the likelihood of a fire happening

RESPONSE - aim for a fire to be extinguished within 4 hours

RESPONSE - minimise the spread of fire within the site and to neighbouring sites

It is strongly recognised that there is a need for emergency preparation and response as it cannot be accepted that all risks are eliminated and all fires are prevented by following this document. Emergency preparation and response is therefore covered in the Emergency Contingency and Accident Management Plan.

On a national level, recognition of the requirement to have contingencies in place in order to redirect incoming feed to other internal or external facilities or ultimately suspend third party and intercompany deliveries are a crucial element to adherence to the requirements and compliance with this document.

Where there is any deviation from the guidance and alternative fire prevention measures are required, these will demonstrate that;

- The three objectives above can still be met; or
- The two fire prevention objectives can still be met, however the fire does not need to be extinguished within 4 hours at your site, for example because it is not close to sensitive receptors.

2.0 RELATED DOCUMENTS / LEGAL REQUIREMENTS

Sims is aware of the statutory requirements and other applicable legislation that applies and maintains a legal register as part of internal management system.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 1 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Other relevant management systems documents are- Environmental and Health and Safety Risk Assessments – Fire Risk Assessments

- EHS Standard 05.08 – Mobile Equipment
- EHS Standard 14.16 – Emergency Contingency & Accident Management Plan
- EHS Standard 10.23 – Hot Works
- EMS Documents such as Operating Techniques, and Waste Acceptance Procedure
- Bale Supplier Management and Bale Inspection Procedure and Bale Supplier Colour Coding template
- Explosion Log Record Template
- Non-Conforming Waste Report Template

3.0 REVIEW

Review of this document will be at least annually, if operations change or after any fire incident.

Change in operations is defined as:

- Additional combustible waste streams will be accepted on site.
- Increased volumes of combustible wastes will be accepted.
- Development of site infrastructure – new buildings.
- Installation of new equipment or fixed or mobile plant.

All relevant parts of the plan will be reviewed. This will include employee training and site monitoring and will also include a review of any relevant associated documents such as the site layout plan. The review will be undertaken by the local Site and Senior Management and the EHS Advisory Team as appropriate

4.0 SITE ACTIVITIES & TYPES OF COMBUSTIBLE WASTES

4.1 SITE ACTIVITIES

The site activities are detailed in the Operating Techniques, but in summary consist of:

- Storage and treatment of ferrous and non-ferrous metals;
- Storage and treatment of general mixed scrap metal;
- Storage of Waste Electrical and Electronic Equipment (WEEE);
- Storage and treatment of End of Life Vehicles (ELV) (pending activity);
- Storage of ELV residues (pending activity);
- Storage of Batteries;
- Storage of Tyres (pending activity);
- Storage and use of non-waste materials e.g. gas cylinders, fuel / oil for use in plant and equipment etc.

4.2 TYPES OF COMBUSTIBLE WASTES

Some waste types stored are considered to be combustible e.g.

- Scrap metals contaminated or mixed with other waste such as plastics
- Un depolluted ELVs – (pending activity)
- De-polluted ELVs – (baled depolluted ELV from ATF)

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 2 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

- Tyres (pending activity)
- WEEE wastes including SMW, ELF (computers and monitors are not received, only potentially as Non-conforming items in SMW which would be removed to quarantine)
- Quarantined wastes e.g. gas cylinders (not covered by the guidance but considered in the plan)
- Non-waste materials e.g. gas cylinders, fuel / oil for use in plant and equipment etc.

Non-ferrous scrap and clean and uncontaminated scrap metal and furnace ready scrap metal are not considered combustible for the purposes of this protocol.

A fire risk assessment is undertaken and both environment and H&S risk assessments will take into consideration potential for risk of fire from activities.

5.0. TRAINING / USING THE FPP

The FPP forms part of the Environment Management System (EMS). It sets out the fire prevention measures and procedures in place and in use on site. It is a standalone document within the EMS so that it can easily be referred to. All employees will know where it is and how to access it easily at all times and during an incident. (Please see availability of plan section below).

All applicable persons are trained on this FPP via means of a Tool Box Talk (TBT), which are documented and reviewed as part of the internal audit process.

Employees receive training to enable them to competently carry out the procedures and measures contained within the FPP. This includes New Starters at Induction and for all employees at regular intervals at least annually via toolbox talks, on-site exercises/drills are carried out twice annually as per EHS Standard 14.16 – Emergency Contingency & Accident Management Plan (see appendix 5). Training needs are monitored via daily site inspections/ drills etc. and training records are kept.

Visitors sign in, are inducted as required and accompanied whilst on site by an employee who is fully conversant with the plan.

Contractors are made aware of the plan as relevant to their roles/ tasks being undertaken via induction / monitored via permit to work system and also via supervision.

All applicable persons are appropriately trained in respect of their roles and responsibilities.

Key employees are trained in the use of firefighting equipment.

5.1. AVAILABILITY OF THE PLAN

A copy of the FPP is provided in electronic format to the Environment Agency (EA) and the Greater Manchester Fire Rescue Services (GMFRS). This constitutes the off-site records. A copy of the FPP is available to all employees and contractors for reference purposes at all times. A copy is available in the Emergency Grab bag located in the weighbridge office and in reception in the event of an incident as shown on site layout plan in appendix 2.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 3 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Drills will take place as per EHS Standard 14.16 – Emergency Contingency & Accident Management Plan, to test how well the plan works and make sure that employees understand what to do. These drills are twice per year.

6.0 SITE PLANS

Appendix 1a & 1b - Plans showing sensitive human and environmental receptors within a 1km radius of the site are contained in Appendix 1 of this Plan. These plans identify any hospitals, nursing homes, schools, residential areas, parks and leisure/recreation areas, surface waters, potable abstractions, protected habitats, fisheries, groundwater SPZ, boreholes supplying water for human consumption etc. within a 1km radius of the site. Transport networks (road, rail etc.) and industrial receptors / workplaces are also visible on the plan as are any electricity pylons (on or immediately adjacent to the site only).

Appendix 2 - Plans showing:

- stockpile location and separation / containment;
- clear area around site perimeter, where applicable,
- location of quarantine areas,
- location of combustible wastes,
- location of hazardous materials e.g. chemicals / gas cylinders;
- location of oil and fuel storage
- areas of natural and unmade ground, where applicable
- the location of fixed plant or where mobile plant is stored when not in use
- drainage runs, pollution control features such as drain closure valves and fire water containment systems
- Locations of CCTV cameras
- safe access & egress for employees and the Fire Rescue Services
- access points around the site perimeter to assist fire fighting
- location of fire-fighting and emergency equipment (including hydrants / extinguishers / alternative water sources e.g. canals)
- Electricity and gas shut off points, where applicable,
- location of emergency assembly point (also contained in the Emergency Contingency & Accident Management Plan (Appendix 5))
- layout of buildings - including location of doors & emergency exits and fire extinguishers.

7.0 MANAGE THE COMMON CAUSES OF FIRE

Listed below are the common causes of fire and signposts to the sections in ‘Manage the common causes of fire’ where the preventative measures which are in place to manage the risk are detailed.

- Arson or Vandalism 7.1
- Plant and equipment faults 7.2
- Electrical faults including damaged or exposed electrical cables 7.2 & 7.3
- Discarded smoking materials 7.4
- Hot works welding & flame cutting 7.5
- Industrial heaters 7.6
- Hot exhausts 7.7 see also 7.2

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 4 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

- Ignition sources 7.8
- Batteries in ELVs / Batteries 7.9
- Leaks and spillages of oils and fuels 7.10 also 7.2
- Build-up of loose combustible waste, dust and fluff 7.11 and see also 7.2
- Reactions between wastes (e.g. non-conforming) 7.12
- Deposited hot loads 7.13
- Non-conforming wastes e.g. LPG tanks & sealed cylinders, petrol lawnmowers, batteries 7.12
- Self-combustion (Frag waste) 8
- Sparks from loading buckets 7.2
- External sources of ignition e.g. open burning / fires on neighbouring sites/ fireworks/ lanterns
Visitors and contractors 7.4, 7.5, 7.14
- Cylinders stored at the site see Quarantine area & ELV Depollution

7.1. Prevent Arson / Vandalism with Security measures

Security measures are in place to prevent unauthorised access and minimise risk of Arson/ Vandalism. This will include arrangements for outside of working hours.

This will include adequate security fencing, CCTV and where applicable security personnel (CCTV is monitored by security company). The secure boundary comprises a combination of steel palisade fencing on external boundaries and wooden fencing on secure boundaries with Network rail. Site entrance and exit are gated and can be secured.

Outside of operational hours (between 17:00 and 07:00hrs) the site is monitored by site security contractors. There are motion detectors on the system of 15 CCTV cameras, which can be used to monitor stockpiles of combustible wastes, which includes looking for signs of fire e.g. smoke or flames.

These cameras are available at strategic locations providing visual coverage of the site including cameras located externally as shown on plan in appendix 2, which will provide wide range of visual coverage of the main external storage areas in the yard including all potentially combustible waste types.

Other security arrangements include an alarm system on office monitored by external third-party security companies, which will prevent unauthorised access to buildings. The site is secured outside operational hours to prevent unauthorised access.

7.2 PLANT & EQUIPMENT

All employees who operate mobile plant are suitably trained as outlined in EHS Standard 05.08_Mobile Equipment. Refresher training is undertaken routinely as outlined in the EHS Standard. Records are kept.

There is a programme of routine inspection and maintenance for static and mobile plant and machinery. All plant and equipment is inspected before use using the daily plant pre-inspection check sheet as detailed in EHS Standard 05.08_Mobile Equipment (see appendix 4). In addition to safety critical checks (brakes, seatbelt, cameras etc.), this inspection includes checking fuel, oil, water & coolant levels and

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 5 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

looking for visual evidence of oil leaks, checking hoses and rams for visual evidence of leaks or damage. Records are kept and provided to site manager or designated employee to implement any actions from the inspections.

All mobile plant and equipment is subject to scheduled routine maintenance in accordance with manufacturer's guidelines. Any defects are reported on the Mobile Plant Daily Inspection and Safety Critical check sheet & repaired. Records of repairs are kept and include Maintenance Assessment and Repair Sheets (MARS), reports from service companies etc. This prevents faults that could cause fire and prevent leaks and spills of combustible fuel and oil.

The FPP would be reviewed should there be any significant changes to plant / equipment on site however it is noted that it would not be practicable / effective to fit all bucket loaders with rubber strips to prevent sparks when the bucket comes into contact with hard-standing. In general the waste materials handled, being scrap metal are not readily combustible. Nonetheless, employees are appropriately trained and are made aware of the potential risk and to be vigilant during any operation where there is potential for sparks to be generated e.g. bucket of loader making contact with ground. Mobile plant that is not being used is be parked away from combustible waste, in locations shown on plan in appendix 2. This area is a minimum of 6m from combustible waste and buildings and ensures separation distances are observed between plant and waste when the site is not operational. This area will double as the hot load quarantine area. When the plant is in use this area is available as the hot load quarantine area. Should the mobile plant be parked up in event of fire, it will be moved quickly to free the hot load quarantine area for use.

Sims employees are trained to respond to spills as detailed in EHS Standard 14.16 – Emergency Contingency & Accident Management Plan. Spill response procedures are tested twice per year using spill drills as detailed in the policy. Spill kits are available at strategic locations and all spills responded to. This prevents spilled combustible fuel or oil trailing or being tracked around site. Only appropriate absorbents are used to absorb combustible liquids and once used, these absorbents are stored in drums to reduce the risk of a potential fire situation and correctly disposed of to a suitably authorised facility. Fire extinguishers are available at strategic locations. Fire extinguishers are fitted in mobile plant and in or by static plant and machinery.

Visual inspections are carried out at regular intervals during the working day and plant operators will regularly inspect their plant to detect the potential for fire caused by dust settling on hot exhausts and engine parts. This takes place at regular intervals throughout operations (a minimum of twice per day) and at the end of the operators shift. Daily routine visual inspections of the site will include a fire watch at least twice per day and at the end of the day and records are made in the site diary / production sheet.

Mobile and static plant and equipment is subject to routine cleaning to prevent accumulation of debris that could settle on hot exhausts and engine parts and potentially cause fire. If daily routine inspections identify an accumulation, additional cleaning takes place before recommencing use.

Fixed plant and machinery used to process the waste are designed specifically for the purpose and constructed to minimise the risk of fire.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 6 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

The plant is maintained on a regular basis by suitably qualified third party contractors / engineers or by Sims employees, which includes a qualified engineer, qualified electrician and other suitably qualified employees. Pre-inspection checks are carried out daily when the plant is in use. In addition, regular maintenance is undertaken.

Only specialist plant and equipment widely used in the waste industry is used to handle wastes (for example JCB, Linde, CAT, Sennebogen, Liebherr or Terex MSH). Mobile Plant routine maintenance / servicing scheduling is completed by the manufacturers of the plant or their service providers. In addition, six monthly Zurich LOLER inspections are completed.

Housekeeping and cleaning activities are carried out daily by trained employees. During this housekeeping process a thorough fire watch is carried out. The housekeeping / cleaning includes removal of loose dust fluff from plant & equipment.

All employees who operate mobile plant are suitably trained as outlined in EHS Standard 05.08_Mobile Equipment. Refresher training is undertaken routinely as outlined in the EHS Standard. Records are kept.

7.3 ELECTRICAL SYSTEMS

Electrical systems are certified by a qualified electrician and there are written procedures in place that set out the regular maintenance, these are summarised below:

Only authorised employees/contractors are allowed to carry out electrical work, including maintenance. A list of authorised employees is maintained.

Permits to Work for electrical work, including maintenance on electrical systems are required and they can only be raised by authorised employees.

Procedures are in place to isolate electrical systems.

An Electrical Code of Practice has been issued to each contractor and it is adhered to when any electrical work is carried out.

Portable equipment is PAT tested annually, 6 monthly for high risk tools.

Fixed Electrical installations are tested every three years by certified electrician and records kept of testing, registrations and accreditations.

Records are kept.

7.4. DISCARDED SMOKING MATERIALS

A no smoking policy is in place in operational areas and designated smoking areas are located a safe distance from combustible wastes to prevent accidental ignition. This is communicated to all employees, contractors, visitors as part of site induction.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 7 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Employees and contractors are inducted and monitored to ensure they follow safe working practices and are aware of the fire prevention and mitigation plan and emergency contingency and accident plan.

7.5. HOT WORKS

Sims has a Hot works EHS Standard 10.23 (see appendix 4). A Point of Work Risk Assessment (POWRA) and permit to work system is in place for hot works such as welding and cutting. Hot work is carried out in a designated safe area at least 15m away from combustible stockpiles and with sufficient fire-fighting equipment available. This will include a fire watch by a nominated employee for a suitable period after hot works have ended. Note: This separation is more than adequate to meet EA guidelines that require a minimum of 6m separation between ignition sources and combustible wastes.

Any welding required in operational areas are subject to additional controls e.g. cordoning off area, cleaning to remove combustible materials and damping down if required.

7.6 INDUSTRIAL HEATERS

Industrial heaters are not used.

7.7 HOT EXHAUSTS

Hot exhausts – see 7.2 Plant & Equipment

7.8 IGNITION SOURCES

There are no space heaters, furnaces, incinerators and other sources of ignition on site. Sources of ignition (e.g. if there were hot works required on site) are kept >6 metres away from combustible and flammable waste. EHS Standard 10.23 requires hot works to be 15m from combustible wastes, see section 7.5 Hot works.

Waste acceptance procedures will ensure that every effort is made to identify and remove any non-conforming items within accepted waste and remove them from within the waste prior to processing. See 7.12 Waste acceptance, inspection and quarantine for details.

See also section 7.2 Plant and Machinery and 7.4 Discarded smoking materials.

7.9 BATTERIES IN ELV

Batteries will be disconnected and removed from un-depolluted ELV without delay following receipt and before ELV are stockpiled for depollution. Batteries will only be disconnected / removed by operatives who have been suitably trained to undertake ELV depollution activities. Batteries will be stored in leak proof acid resistant battery boxes.

7.10 LEAKS AND SPILLAGES OF OILS AND FUELS

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 8 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Procedures are in place to ensure fuels, oils and combustible liquids are appropriately stored to prevent leaks and spills. Storage is at least 6m away from stockpiles of combustible wastes.

Sims employees are trained to respond to spills as detailed in EHS Standard 14.16 – Emergency Contingency & Accident Management Plan. Spill response procedures are tested twice per year using spill drills as detailed in the EHS Standard. Spill kits are available at strategic locations and all spills are responded to. This prevents spilled combustible fuel or oil trailing or being tracked around site. Only appropriate absorbents are used to absorb combustible liquids and once used, these absorbents are stored in drums to reduce the risk of a potential fire situation and correctly disposed of to a suitably authorised facility.

See also 7.2 Plant and Equipment, which details daily visual inspections of plant for leaks and also visual checks of hoses etc. for damage / leaks.

Un-depolluted ELV are inspected for leaks at point of receipt to prevent spills trailing and being tracked about on site. ELV are stored on impermeable surface and further visual checks are undertaken routinely throughout the day, as part of routine fire watch twice during operations and once at the end of the day.

7.11 BUILD-UP OF LOOSE COMBUSTIBLE WASTE, DUST & FLUFF

Inspections take place daily and housekeeping is regularly undertaken to prevent the build-up of loose combustible waste, dust and fluff on plant, equipment, within buildings and around the site. See also 7.2 Plant & Equipment

7.12 REACTIONS BETWEEN WASTES, WASTE ACCEPTANCE & INSPECTION & QUARANTINE

The waste types that are accepted on site are neither incompatible with each other nor unstable and therefore there will not be reactions between these wastes. In any event they are stored separately. All relevant employees are appropriately trained in respect of waste acceptance procedures and to identify non-conforming wastes. Records of training are kept.

Written waste acceptance procedures are in place to prevent non-conforming wastes and where these are identified, remove them from the waste stream to minimise the risk of these items causing a fire.

In summary, there is communication with every supplier before a decision is made to accept the waste. Every load is then inspected on numerous occasions by suitably trained employees who control the inspection, reception and validation of wastes, for presence of non-conforming items. Upon arrival at the weighbridge, paperwork is scrutinised & wastes visually assessed so far as is reasonably practicable, an inspection note is issued. Upon receipt at the dedicated waste reception area, wastes are inspected and the inspection note is completed. If the site operative is unsatisfied with any particular item(s) or indeed the whole load, the non-conforming waste procedure below is followed. This ensures the risk of fire is reduced by removing any potential ignition sources, non-conforming items etc. from the waste stream prior to stockpiling.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 9 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Further inspection of the waste takes place during the movement/ placement of the waste to the stockpile area for the presence of non-conforming items and as detailed in the Operating Techniques

Suppliers are informed of the waste acceptance criteria and the main material types prohibited are displayed at the site entrance. This procedure prevents any non-conforming wastes that could be incompatible or unstable wastes causing a reaction.

In the event that a suspected hot load arrives on site, this is taken to the hot load quarantine area for further inspection / action as required.

In the event of fire on the site, the planned use of the hot load quarantine area in this scenario is to segregate any burning material or unaffected material with a grab / shunters depending on location of fire so the fire-affected material can be grabbed from the pile and spread out and extinguished.

A quarantine area is available for small non-conforming items; this is separate from the hot load quarantine area.

Waste acceptance also involves inspecting the load for any signs of fire or hot waste. Please see 7.13 hot load quarantine

A cage is available for the appropriate containment of quarantined orphaned gas cylinders.

Waste Acceptance

All relevant employees are appropriately trained in respect of waste acceptance procedures and to identify non-conforming wastes. Records of training are kept.

Written waste acceptance procedures are in place to prevent non-conforming wastes as detailed in the operating techniques and summarised herein.

Pre-acceptance procedures are in place to prevent acceptance of unsuitable wastes and ensure their suitability for the treatment process. In summary, this will consist of checks undertaken by Commercial/ Site Management and will include information on the composition of the waste, the process giving rise to the waste, the likely quantities and any hazards that may be associated with the waste. These checks are carried out before a decision is made to accept the waste.

Every load is inspected for the presence of non-conforming items and as detailed in the Operating Techniques. Non-conforming items found are rejected or quarantined as appropriate. Suppliers are informed of the ferrous and non-ferrous waste acceptance criteria and the main material types prohibited are displayed at the site entrance. This procedure will prevent any non-conforming wastes that could be incompatible or unstable wastes causing a reaction. Waste acceptance will also involve inspecting the load for any signs of fire or hot waste. Please see hot load quarantine details below.

The waste types that are accepted on site (solid scrap metal, un-depolluted ELV, depolluted ELV, WEEE, lead acid batteries) are neither incompatible with each other nor unstable and therefore there will not be reactions between these wastes. In any event, they are stored separately.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 10 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Any batteries found as non-conforming items are removed without delay and are stored in a leak proof acid resistant battery box.

Small Mixed WEEE (SMW) stored separately to facilitate stockpile management.

7.13 DEPOSITED HOT LOADS & HOT LOAD QUARANTINE

An area on site is maintained as a hot load quarantine area. i.e. somewhere a suspected hot load could be deposited or where unburnt wastes could be moved to isolate and prevent them catching fire.

The area is within the site boundary, is capable of holding 50% of the largest stockpile of waste (i.e. circa 250 tonnes) and is shown on the site plan. A separation distance of at least 6m is maintained around the hot load quarantine area.

Due to the nature of operations and the size of the site, this quarantine area may occasionally need to be flexible in terms of location. If there are any temporary changes to the location of the quarantine area, this is communicated to all employees during the morning meeting and documented in the minutes. Any changes meet the same criteria as detailed above re separation distances/ capacity etc.

The hot load quarantine area or other designated area as detailed above is available at all times, should it be required.

In the event that a suspected hot load arrives on site, this is taken to the hot load quarantine area for further inspection / action as required.

In the event of fire on the site, the planned use of the hot load quarantine area in this scenario is to segregate any burning material or unaffected material with a grab depending on location of fire so the fire-affected material can be grabbed from the pile and spread out and extinguished.

Other Quarantine Areas

There are three types of quarantine area on site: Hot load quarantine area described above, temporary quarantine area and quarantine area.

Separate quarantine areas are available for wastes pending further inspection (temporary quarantine) and for smaller non-conforming items (quarantine area) shown on plan in appendix 2.

7.14 EXTERNAL IGNITION SOURCES

It is not possible to influence/ reduce the likelihood of being impacted by external sources of ignition e.g. open burning / fires on neighbouring sites/ fireworks/ lanterns etc., however what is achievable is to manage and monitor the site to minimise the impact should an external ignition source occur.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 11 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

8.0 STORAGE TIMES & PREVENT SELF COMBUSTION

Where wastes have the potential to self-combust, these are considered below.

Self-combustion happens when a material, which can self-heat, generates heat at a faster rate than it can be lost to the environment.

EA guidance states, *“many wastes can self-combust under certain conditions. Self-combustion happens when a material which can self-heat generates heat at a faster rate than it can be lost to the environment. The temperature continues to rise in the material speeding up the rate of reaction and releasing even more heat. Eventually the material reaches auto-ignition and the material then self-combusts. You can prevent self-combustion by carefully managing storage times, pile volumes and height, and the temperature of the wastes. To help prevent self-combustion your plan must define the maximum storage time of all materials on site and how you’ll control and monitor this. You must make sure that any combustible wastes are stored for less than 6 months (unless the material is compost and the Environment Agency has agreed that you can store it for longer). Storing combustible wastes for longer than 6 months could increase the likelihood of a fire. If you’re storing combustible wastes in the maximum pile sizes for longer than 3 months, you must show what extra measures you’ll use to prevent self-combustion. For example, this could include monitoring temperatures in the waste.”*

The combustible scrap metal stored on site will not self-heat / will not self-combust as detailed above.

8.1 FRAGMENTISER WASTE

The site does not store Fragmentiser waste.

8.2 OTHER STOCKPILES OF COMBUSTIBLE WASTE

The combustible wastes stored on site will not self-heat / will not self-combust as detailed above. Regular visual monitoring of the wastes takes place, negating the need for any physical temperature measurements to be taken.

To reduce the risk, it is proposed that all combustible materials are stored on site for no longer than the maximum suggested duration specified in the EA Fire Prevention Plan Guidance; 6 months.

Stocks are removed from site regularly each week, negating the need for stock turning / rotation.

Stockpile sizes are minimised, so far as is reasonably practicable. Wastes are stored in designated areas or bays. Daily site inspections monitor waste storage and check it is in line with the plan. Contingencies are in place in the event that stockpiles near the limits imposed by the plan.

External heating during hot weather has been taken into account and is not considered to be a significant risk to this industry. The waste types are not so combustible as to be affected by hot weather and given the relatively short timescales the wastes are stored on site, the risks are further reduced. It is considered unnecessary to have to shade waste from direct sunlight.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 12 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

9. MANAGE WASTE STOCKPILES

The site takes into account EA guidance to establish separation distances from other stockpiles and from buildings.

Combustible wastes are generally stored in bays or open stockpiles. For storage in bays please see 11.2.

9.1 GENERAL STOCKPILE MANAGEMENT

The planning of site production is the cornerstone for ensuring that stockpiles meet the requirements of this plan in terms of quantity and storage times. At least daily site inspections and monthly stock takes will form the process for this assessment/ review.

Sims has access to adequate resources to facilitate the regular turnaround of combustible wastes on site to ensure storage times are kept to a minimum and maximum storage times (3 months for most combustible wastes) and stockpile limits are adhered to.

The site is a 'feeder yard / Non ferrous hub', the purpose of which is to supply Sims larger sites or third party with material for processing / recovery. As a result, wastes will not be stored for prolonged periods and turnaround will be regular. Stocks of combustible wastes will regularly be removed and will generally be stored for around 1 week: far less than the 3 – 6 months limit advised by guidance.

Sims Site Management team visually manage the waste stockpiles on a daily basis and contact Sims Central Planning to arrange for collection of wastes on a routine and regular basis and in advance of approaching the maximum stockpile limits. Removal of the waste is organised by the Central Planning Team, who arrange for transport using either Sims own fleet or other suitably authorised registered waste carriers. The proactive approach to management of logistics between Site Management and Central Planning Team ensures typical operations are maintained and maximum stockpile sizes and storage times are not exceeded.

Small Mixed WEEE (SMW) is stored separately to facilitate stockpile management. Wastes are removed regularly, usually on a daily basis and the bay cleared out daily site aims to zero stock daily / minimise amount kept on site overnight. The aim is to keep minimal stocks on site.

In the event of extenuating circumstances, for example, if stockpile limits were reached (e.g. if receiving facilities were unable to accept the wastes or there was a significant failure in logistics) or in the event of an emergency and the site had to cease waste acceptance:

- Sims prioritises supply streams, holding wastes at supply sites and diverting to a network of third party facilities; and / or
- Sims has a network of other scrap metal yards (for example nearby are Castleford, Alfreton, Nottingham & sites in Hull) to which wastes can be diverted in event of extenuating circumstances.

The materials received are not subject to substantial seasonal variation in demand and/or supply.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 13 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Sims has a breadth of experience managing scrap metal / waste and can effectively manage any seasonality of supply/off-take etc. throughout our network of facilities/ contacts, demonstrating that our waste management is viable.

9.2 MANAGE STOCKPILE SIZE AND LOCATION

Potential stockpile sizes, storage methods/types and appropriate separation distances have been identified and used to plan the storage arrangements. The location of storage areas and site infrastructure are shown on site layout plan in appendix 2.

Factors such as active firefighting/ access, egress & escape routes/ locations of buildings/ plant and equipment/ potential ignition sources, flammable materials and hazardous substances kept on site such as gas cylinder cages, diesel tanks, quarantine areas which may contain non-conforming wastes/ operational practicalities such as movements of vehicles & designated routes etc. have been taken into account when deciding the site layout and stockpile locations.

Stockpiles are located so as not to compromise access to firefighting equipment.

EA guidelines as detailed below for combustible wastes are detailed below.

4 m and stockpile dimensions 20m * 20m for combustible wastes detailed below. Combustible waste type	EA guide	Other notes
WEEE containing plastics, including fridges, computers and televisions	450 cubic metres	
Tyres and rubber	450 cubic metres	50 tonnes
Metals other than WEEE (including crushed ELVs, which are classed as 'baled' waste for the purpose of this table.	750 cubic metres (450 cubic metres baled)	
Fragmentiser fluff	450 cubic metres	

Unless otherwise specified in the table below, stockpiles are stored in accordance with the guidelines in the table above.

Hazardous / combustible wastes e.g. un-depolluted ELV, are stored in their largest form prior to treatment processes, which will remove the hazardous components.

SMW, Lead Acid Batteries, ELF, TV and Monitors (if found, the site does not purchase TV's and monitors), but also combustible non-hazardous wastes e.g. tyres (when removed from ELV or if found, the site does not purchase tyres) are not treated on site and are stored in their largest form prior to removal to a suitably authorised facility.

Tonnage restrictions for any particular waste type on the site may change depending on the particular materials stockpiled and yard conditions at the time. However, these are dependent on checks being in place to ensure safety at all times and those with potential hazards to be kept away from pedestrian areas/working areas.

Care is taken to ensure that waste is stored in a safe manner and there are no signs of stockpiles being unstable.

The maximum quantities of wastes stored onsite at any one time and maximum stockpile sizes are:

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 14 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Waste type	Max quantity on site	Max quantity in any one stockpile	Stockpile dimension/ conditions**	Duration
Ferrous e.g. Light Iron Shearing unprocessed Processed 1&2 (sheared) including depolluted ELV and non haz WEEE and O/S	2500 tonnes likely consisting: 100 tonnes Light Iron 1000 tonnes shearing (500t stockpiles) 1000 tonnes export 1&2 300 tonnes of OA O/S OA	500 tonnes / will not exceed 750m ³	20m*20m*6m	Daily movements of Light Iron & typically weekly for other grades. Will not exceed 3 months
ELV	50	24 ELV	2 high and 2 wide can be easily moved if required	Typically 1 month will not exceed 3 months
Baled depolluted	100	100 150m ³		
SMW/ SDA	15 tonnes	15 tonnes / 70m ³	8m*8m*4m	Daily movements. Typically 1 week will not exceed 3 months
ELF	21 tonnes	7 tonnes	Stand trailer 12m *1.5m*2m	
Lead acid batteries	30 tonnes – typically there will be circa 25 tonnes on site	30 tonnes /30m ³	15m*2m*4m	Circa every 2 weeks sometimes weekly depending on stocks. Typically 1 month will not exceed 6 months
Tyres	10 tonnes onsite at any one time, stored in stable stacks or a skip	10 tonnes/ 50m ³	Roro bins	Typically 3 months will not exceed 6 months
Quarantined waste/ incl. orphaned gas cylinders	5 tonnes /incl. 1 tonne gas cylinders in cages			Will not exceed 6 months
Non-ferrous – clean and uncontaminated NF not considered combustible for purposes of this plan*	1000 tonnes	50 tonnes / 50m ³ – 150m ³ typically. Inside the small non ferrous building metals will be stored in 1 tonne capacity containment bins/ stillage/ sacks max 24 tonnes In brass building materials in bays not combustible circa 4 bays 40 tonne per bay, in bags 2.5 tonne bags 200 tonnes max	None greater than 20m*20m*4m Inside building metals will be stored in 1 tonne capacity containers – bins/ stillage/ sacks	Typically 1 month will not exceed 6 months

Waste type	Max quantity on site	Max quantity in any one stockpile	Stockpile dimension/ conditions*	Duration
------------	----------------------	-----------------------------------	----------------------------------	----------

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 15 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Swarf	Non ferrous 10 tonnes Ferrous 25 tonnes	10 200t (bay open dry)	Bay dimensions <20m*20m*4 Roro 6m*2m*2m	Typically monthly will not exceed 3 months
Waste oil pending	2,000 litres in bunded tanks	1000	n/a	Typically 6 months will not exceed 12 months
Waste petrol	2,000 litres in bunded tanks	1000	n/a	Typically 6 months will not exceed 12 months
Waste diesel	2,000 litres in bunded tanks	1000	n/a	Typically 6 months will not exceed 12 months
Dirty / Mixed Fuel	2000l	1000		
Waste coolant	2000 litres in bunded tanks	1000	n/a	Typically 6 months will not exceed 12 months
Brake Fluid	205 litres in bunded	205	n/a	Typically 6 months weeks will not exceed 12 months
Air Con gases	24 kg in 12 kg cylinders	2* 12kg	n/a	Typically 6 months weeks will not exceed 12 months
Oil filters	500 kg in 205 l drums	2*205	n/a	Typically 6 months weeks will not exceed 12 months
Temporary Quarantine (wastes pending further inspection)	25 tonnes	25 tonnes	6m*2.4m*3m	typically will not exceed 1 week
Quarantined waste/ orphaned gas cylinders	5 tonnes (no more than 2 tonnes gas cylinders in cages)	1 tonne cylinders 4 tonnes other quarantine	3m*10m*2.5m approx.	Will not exceed 6 months

*these are maximum dimensions

The above dimensions exceed the EA guidance for some waste types, e.g. ferrous (Light Iron / shearing 6m high), but this is justified on grounds that the three key objectives can still be met.

The environment management system will minimise the likelihood of a fire occurring through:

- Robust waste acceptance and inspection to minimise risk of non-conforming wastes (as detailed earlier in this FPP, in the operating techniques) will identify items that could potentially cause an issue and remove them from the waste stream;
- By controlling of potential ignition sources (as detailed earlier in section 7 of this FPP);
- Through inspection and management of stockpiles - Stockpiled wastes are regularly inspected. A fire watch will take place as part of daily routine visual inspections of the site at least twice per day and at the end of the day. During the fire watch, the stockpiles, plant, and equipment are thoroughly inspected for signs of fire or potential causes of fire. As detailed in waste acceptance procedure, wastes are visually inspected again for non-conforming items as part of the handling process. Any non-conforming items found are removed to quarantine.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 16 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Site management visually assess stockpile size, volume during the daily inspections and this information is used to determine / update production / logistic requirements. In the event stockpile size is approaching maximum, another stockpile will be created.

In addition, firebreaks and emergency preparedness and response equipment and procedures will minimise the spread of the fire within the site and to neighbouring sites and fire stockpiles are manageable by resources on site so that, should a fire break out, it could be extinguished within 4 hours.

Resource is available (plant & employees) to split up a pile and segregate from burning material in event of fire to minimise spread / extent of affected waste. Water tanks are strategically located in close proximity and emergency responses are tested.

Manage stockpile durations and storage times

Combustible waste storage times are kept to a minimum.

Regular visual monitoring of the wastes will take place, negating the need for any physical temperature measurements to be taken.

The physical structure of the stockpiles (large metal pieces of varying shapes) means that monitoring with temperature probes is not practicable and other technology will not be warranted given the level of risk of self-combustion are negligible.

To reduce the risk, it is proposed that all combustible materials are stored on site for no longer than the maximum suggested duration specified in the EA's Fire Prevention Plan Guidance; 6 months. EA guidance advises that storing combustible wastes for longer than 6 months could increase the likelihood of a fire. EA guidance also advises if storing combustible wastes in the maximum pile sizes for longer than 3 months, extra measures must be demonstrated to prevent self-combustion.

Sims Manchester will store combustible wastes for generally around a week, never more than 3 months. There are daily movements. At this frequency of turnaround, the risk are greatly reduced.

Small Mixed WEEE (SMW) will be stored separately to facilitate stockpile management. Wastes are removed regularly, usually on a daily basis and the bay cleared out approximately weekly. The aim is to keep minimal stocks on site.

These durations are far lower than the three to six months recommended by EA Guidance and at this frequency of turnaround, the risks are greatly reduced.

10. WHERE MAXIMUM PILE SIZES DO NOT APPLY

10.1 Whole ELV

End of Life Vehicles (ELV) are stacked 2 high and in rows 2 wide. Plant and equipment is available to move ELV quickly so that ELV are accessible from at least one side for firefighting in event of a fire.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 17 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

10.2 Waste stored in containers

Combustible wastes stored in skips or containers e.g. tyres are stored in skips that are accessible so any fire that should occur inside it can be put out. The tyre skip/s are 6m from ELV building. Plant and equipment is available to move skips quickly if required in the event of a fire.

11. PREVENT FIRE SPREADING

There are two main ways detailed in guidance to prevent fires from spreading – separation distances and fire walls and bays.

11.1 SEPARATION DISTANCES

Combustible waste in open stockpiles are stored with a separation distance / fire break of at least 6 metres from other combustible waste piles, buildings, flammable materials and the site boundary as shown on plan in appendix 2.

Sources of ignition are kept at least 6 metres away from combustible and flammable waste.

Procedures are in place to ensure fuels, oils and combustible liquids are appropriately stored to prevent leaks and spills. Storage is at least 6m away from stockpiles of combustible wastes.

There are 6m breaks between externally stored stockpiles of combustible waste e.g. Light Iron, shearing, SMW, ELF, ELV.

End of Life Vehicles (ELV) are stacked 2 high and in rows 2 wide. Plant and equipment is available to move ELV quickly so that ELV are accessible from at least one side for firefighting in event of a fire

Combustible wastes stored in skips or containers e.g. tyres are stored in skips that are accessible so any fire that should occur inside it can be put out. The tyre skip/s are 1m from ELV building. Plant and equipment is available to move skips quickly if required in the event of a fire.

Wastes are stored 6 metres from buildings.

Batteries are stored separate by hazard and in battery boxes, drums or containers with lids or undercover.

Monitors (where applicable i.e. if found as non conforming items) are stored undercover in small quantities in storage bags or stillages/ boxes as appropriate.

Waste / orphaned gas cylinders are stored in lockable cage.

Combustible materials for use on site e.g. fuel / gas cylinders etc. are appropriately stored. Gas cylinders for use are labelled and stored upright in appropriate cages at locations shown on site layout plan in appendix 2. Fuel / oil are stored labelled in appropriate bunded storage. Chemicals are stored in a COSHH Cabinet.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 18 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

11.2 FIRE WALLS AND BAYS

Where combustible wastes are stored in existing bays, we will have the fire resistance of the existing bays tested and if they do not provide 120mins fire resistance we will review / propose alternative measures.

Regarding bay construction, in the event that we need to review, we are considering bays constructed of interlocking concrete blocks e.g. Legato™ or equivalent by other manufacturer or a bespoke steel plate design with an air gap that provides equivalent of class A1 fire resistance in accordance with clause 4.3.4.4 of EN13369. This will offer a fire resistance period of at least 120 minutes to allow waste to be isolated to stop fire spreading and minimise radiant heat.

When installing such products, the installation method used is in line with the manufacturers recommended installation requirements.

Segregation of materials is ensured by storing in designated areas, bays or containers. This is checked by daily site inspections.

Combustible waste are stored with a freeboard space of 1m at the top and sides in accordance with latest available guidance and this will prevent fire bridging / spreading.

12. QUARANTINE

See section 7.12 and 7.13. The volume of the quarantine area is 50% of maximum stockpile size (250t / 375m³).

13. DETECTING FIRES

The FPP ensures that adequate procedures are in place to detect a fire in its early stages so as to reduce its impact.

The detection systems on site are visual. This is appropriate to the nature and scale of the waste management operations. During operational hours, the site management team will visually monitor stockpiles, plant, and machinery. Outside of operational hours, security contractors will visually monitor the CCTV.

The site is manned by Sims employees from 07:00 – 17:00 hours Monday to Friday and 08:00 – 12:00 hours on Saturdays and it is the aim of site management team to have minimal stockpiles of SMW left on site at weekends.

SMW - Visual inspections will take place frequently and at least twice daily, during operation and at the end of the day.

Procedures are in place during and following hot works to monitor and detect the outbreak of fire as detailed in EHS Standard 10.23.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 19 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

A fire watch will take place as part of daily routine visual inspections of the site at least twice per day and at the end of the day.

During the fire watch, the stockpiles, plant, and equipment are thoroughly inspected for signs of fire or potential causes of fire. On mobile plant, this will include checking for accumulations of debris on areas of the equipment that will get hot during operation. In stockpiles, this is undertaking inspections for signs of fire and for non-conforming items that could be sources of ignition. Records of inspections are kept in the Site Diary records.

In addition to undertaking routine fire watch, every load is inspected in accordance with waste acceptance procedures where a thorough visual inspection is made at point of receipt, during any handling/ stockpiling activity and again when loading. Employees are trained to be vigilant for non-conforming items.

Outside of operational hours (between 17:00 and 07:00hrs) the site is monitored by site security contractors. There are motion detectors on the system of 15 CCTV cameras, which can be used to monitor stockpiles of combustible wastes, which includes looking for signs of fire e.g. smoke or flames.

These cameras are available at strategic locations providing visual coverage of the site including cameras located externally as shown on plan in appendix 2, which will provide wide range of visual coverage of the main external storage areas in the yard including all potentially combustible waste types.

Security Contractors are instructed to call the GMFRS immediately upon detecting a fire and they will have details of who to contact at Sims in event of an emergency out of hours.

In addition to the above, all employees are trained in Emergency Procedures and to be continuously vigilant for any signs of fire. This will extend to site security where responsibility is allocated.

14.0 SUPPRESSING FIRES & STORAGE OF WASTE IN A BUILDING

Manual firefighting techniques are implemented in the event of a fire. Automatic suppression systems are not considered proportionate to the nature and scale of waste management activities that are carried out and the associated risks.

Reasoning for manual only fire suppression systems:

Management practices as detailed above will ensure stockpiles of potentially combustible wastes are kept low and regularly removed from site. Maximum storage times of potentially combustible wastes (24 hours to 1 week - typically) are far shorter than the 3 – 6 months recommended by EA guidance. Management practices as detailed above will ensure that the common causes of fire are managed and the risk /likelihood of a fire are minimised.

Potentially combustible wastes are regularly monitored both during and outside operational hours for signs of fire.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 20 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Potentially combustible waste types are stored in external stockpiles with firebreaks and access is maintained for emergency vehicles meaning that there would be no potential restrictions/ limiting access factors, which would prevent a fire being tackled effectively.

If a fire were to occur, its spread would be minimised by effective emergency response as detailed in the Emergency Contingency and Accident Management Plan and the provision of fire breaks.

The size of the stockpiles is minimised and will ensure any fire could be extinguished quickly and within 4 hours.

14.1 WASTE IN A BUILDING

Operational Buildings

There is the requirement to store small quantities of certain wastes types within buildings as detailed below:

Non-ferrous wastes in the non-ferrous building are subject to a robust waste acceptance and inspection criteria. Each load is carefully inspected and the wastes graded and stored separately by grade. This will ensure the wastes will not contain any non-conforming items or potential ignition sources. Small quantities of non-ferrous swarf are stored in bags in the non-ferrous building. These volumes are small and turnaround frequent.

Lead acid batteries, are stored upright in leak proof, acid resistant dedicated battery boxes. The majority of battery storage is outside in leakproof acid resistant boxes with lids to prevent ingress of water. The storage methods will ensure the risk of short circuit/ fire is minimised. The quantity stored in the building are low. The area is regularly inspected and is covered by CCTV and monitored outside of operational hours by security. The risk will therefore be low and the use of automated detection / suppression systems will not be proportionate to the nature and scale of the risk.

Overall, the risk will therefore be low and the use of automated detection / suppression systems will not be proportionate to the nature and scale of the risk.

All escape routes, fire exits and fire extinguishers are kept clear and free from waste at all times.

There are no heaters in the waste storage areas. Any electrical equipment present is kept free from waste, including dust and packaging materials. All electrical equipment is tested as specified in plant & equipment.

Operational buildings have roller shutter doors which can be opened as a means of access for fire fighting and as a means of clearing smoke from the building. There is separate pedestrian access.

Office areas / buildings

The office area and mess facility are completely separate / compartmentalised from any operational areas.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 21 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Fire Alarm system in office building and yard is tested weekly. Drills are undertaken.

15. Fire Fighting Equipment & Strategy

Protecting the health and safety of people on site is the priority in the event of a fire.

The site layout allows for active firefighting. This enables fire to be extinguished within the shortest time possible.

The site Environment Management System (EMS) is designed to prevent fires or in the event that a fire occurs, to identify it without delay and tackle in its infancy to minimise impact.

Resources are available to fight a fire including plant and trained operatives to move waste:

- Separating unburned material from fire, applying water to cool unburned material and other hazards (only when necessary to prevent spread of fire, to minimise amount of water used so as not to add unnecessarily to water volume / pollution)
- Separating burning material from the fire so it can be quenched with IBC water / extinguishers or hoses or to assist the FRS in the event that Fire Rescue Service are in attendance.

Sims employees are trained to respond to fires as detailed in EHS Standard 14.16 – Emergency Contingency & Accident Management Plan (see appendix 5 for site specific plan and appendix 4 for EHS Standard). Sims employees are trained in the Fire Prevention Plan. Records of training are available. This will extend to site security where responsibility is allocated.

In case of a fire, breaking out the Emergency Controller (or deputy) is alerted immediately and the onsite fire-fighting equipment is employed. The Emergency Contingency and Accident Management Plan is initiated.

Fire-fighting equipment is located at strategic locations near to areas of combustible waste storage to aid rapid response to suppress a fire. Fire-fighting equipment consists of:

- Portable extinguishers in or strategically located near items of plant / equipment and at various locations throughout the site as shown on plan in appendix 3.
- Water tank and hose are being installed at a strategic location as shown on plan in appendix 3.

The Greater Manchester Fire Rescue Service GMFRS are called when deemed necessary by the Emergency Controller.

In worst case scenario, if a fire was to occur that could not be tackled quickly and safely using on site resources then the fire rescue service would be called. The Greater Manchester Fire and Rescue Service (GMFRS) have several whole-time stations located nearby at Gorton which is approx. 1.4 miles from the site and <5 minutes response time, Manchester Central which is approx. 1.6 miles from the site and around 7 minutes response time and Philips Park which is approx. 2.2 miles and < 10 minutes from site. GMFRS have other resources available in the area in Moss side, Blackley, Withington and Wythenshawe.

Provision of water supply for fire fighting

There are fire fighting supplies on site as shown on the plan provided in appendix 2. They consist of:

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 22 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

2 * IBC water located adjacent to SDA bay and by Light Iron
Additionally 1* 30,000 litre tank will be located by the entrance. The tank will have hose attachments and can be used for firefighting.

In addition, water will be sourced from fire hydrants / fire engines to meet these requirements. The Fire hydrants are the property of United Utilities and are all 225mm diameter water supply hydrant. Using STW Flow rate estimator tool, a 50mm diameter water supply connection would be required to meet 50 l/s supply. Therefore, the 100mm diameter fire hydrants will be more than sufficient. (EA guidance advises a water supply of at least 2000 litres a minute (2000 l/min = approx. 34 l/s) for stockpile 300m³)

The location of the nearest fire hydrant is on Rondin Road on the corner of the site by lamppost approx. 30m from site entrance to the left-hand side as looking into the yard from the Rondin Road. The direction of this is indicated on the plan shown in appendix 3. This is a 225mm diameter hydrant. Additionally, there is a hydrant approx. midway up Sussex Avenue in front of SRCL Ltd building. This is also 100mm diameter hydrant.

In addition, the firefighting resources available on site, plus and fire tenders in attendance will ensure adequate water supply.

All relevant, key contact details for both internal and external communications are detailed within the Emergency Contingency and Accident Management Plan. This Fire Prevention Plan and the Emergency Contingency and Accident Management Plan is held onsite (emergency grab bag) and is easily retrievable by both site employees and the Fire and Rescue Service.

Discussions are taking place with Fire Rescue Service.

Safe access and egress

Safe access and egress to the site for fire and rescue services and other emergency responders is achieved from the Rondin Road via main entrance / exit as shown on plan in Appendix 2.

Access is adequate to fight fire from within the site premises and that there is no need to access the whole perimeter of the site or access neighbouring sites in the event of a fire.

Internal roadways are maintained to enable fire access at a minimum of 4m width. There are no weight or height restrictions on site transport routes or on the immediate access roads in the vicinity of the site that would restrict access for Fire Rescue Service FRS appliances. Access has minimum of 3.7m width and 3.7 - 4m height clearance and min weight restrictions >24 tonnes.

16. WATER SUPPLIES

See 15.

17. MANAGING FIREWATER & MINIMISING EMISSIONS TO WATER, LAND & AIR

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 23 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

All combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on the community, critical infrastructure and the environment) are minimised by the methods detailed below.

17.1 Firewater & Minimising Emissions to Land / Water

The EMS is designed to prevent fire, detect quickly and respond in infancy in the event of a fire. The EMS will therefore reduce the extent of any fire and hence the amount of water required and therefore firewater potentially generated.

Managing Fire Water & Foam

The site will prevent firewater entering surface waters, for example rivers, streams, estuaries, lakes, canals or coastal waters and into the ground.

The operational site surface is impermeable pavement with sealed drainage system as shown on the plan and this minimises the risk of pollution from firewater into the ground.

The EMS is designed to minimise the amount of firewater generated.

The site drains to Sewer.

Firewater will be contained on site within the drainage system / interceptor or on the site surface, as far as is reasonably practicable, using penstock valve to prevent discharge to sewer, whilst advice is sought from United Utilities / tanker companies regarding discharge or disposal.

The manhole cover keys will be kept with the Emergency Grab Bag, which is located in the office.

The site will be able to contain the following volumes of firewater in the interceptor which has a capacity of approx. 10,000 litres and approx. 50,000 litres will be stored within attenuation tank and drainage infrastructure. 30, 000 litres back in the tank once used.

Tankers will be mobilised to remove firewater and / or if possible an agreement with United Utilities to discharge to sewer.

If firefighting water has entered, or has the potential to enter, the United Utilities sewerage system during an incident, United Utilities will be contacted on 0345 6723723 (emergency) stating the site name and location, the potential composition, volume and discharge rate of firefighting water to the foul sewer. United Utilities contact number will also be included in the Emergency Contingency and Accident Management Plan.

It will be vital that the measures implemented to deal with firewater run-off do not inadvertently hinder the firefighting process or trap or delay the fire-fighting personnel or any employees assisting the GMFRS.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 24 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

After the fire has been extinguished, there may be accumulated water stored on site / in the drainage system, that requires disposal. This water will be removed from site by tanker to suitably authorised facility or discharged to sewer with the permission of United Utilities.

There are no nearby surface water courses e.g. rivers, streams, estuaries etc.

17.2 Minimising Emissions to Air

The EMS described above is designed to prevent fire and in the event of fire, to detect it quickly, respond to implement emergency response plans immediately with the aim of minimising the spread and extinguishing as quickly as possible. This will minimise combustion products and emissions to air and hence minimising potential for impact on the community, critical infrastructure and the environment. The FPP and ECP contain details on how to liaise with adjacent industrial receptors and sensitive receptors so they can minimise their exposure to any combustion products e.g. smoke.

18.0 DURING & AFTER AN INCIDENT

18.1 DURING

Contingency during a fire

A contingency is in place to divert incoming wastes during a fire. Site management will contact senior management/ commercial teams and central planning to redirect incoming loads to other internal or external facilities as necessary e.g. Huddersfield, Leeds, Nottingham, Smethwick, Hull etc. Sims has a large network of other facilities that could also receive wastes in the event of an emergency.

Sensitive receptors

Sensitive receptors are shown on the plans in appendix 1.

Sensitive Human receptors on plan in appendix 1a and sensitive ecological receptors on the plan in appendix 1b.

There are no sensitive receptors immediately neighbouring the boundary of the site.

There are some residential areas, the closest being to the south of the site on the Anthony Road circa 130m away and to the north on the wren way which are within 310m of the site and the advice of the FRS will be sought in respect of communicating with the public in the event of an incident. There is four sensitive receptors, East Manchester Academy, Bridge College, Cornerstone Family Practice, Five Oaks Family Practice, which are located within 1000m down-wind of the site.

Receptor	Distances to site (m)	Contact details
Educational sites		

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 25 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

East Manchester Academy 60 Grey Mare Ln, Beswick, Manchester M11 3DS	933 North East (down-wind)	0161 230 8039
Bridge College Openshaw Campus, Whitworth St E, Openshaw, Manchester M11 2GR	945 North East (down-wind)	0161 487 4293
Care homes and GPs		
Cornerstone Family Practice The Cornerstone Centre, 2 Graham St, Manchester M11 3AA	896 North East (down-wind)	0161 223 0637
Five Oaks Family Practice 47 Graham St, Manchester M11 3BB	977 East (down-wind)	01612234211

Sims Site Management will contact the immediate neighbours (adjacent industrial receptors listed as 'other receptors') in the event of a fire that is likely to have impact on them.

Other Receptors		
Receptor	Distances to site (m)	Contact details
Network Rail	Immediate neighbour 0m	0800 200 6060
Siemens Trains Care facility	30m East	0161 276 3750
Council Car Pound	30m West	0161 234 4149
McGuinness	10m North West	0161 273 5272
Hollands Hydroponics	30m North East	0161 273 5995

The following receptors are located upwind of the site and so should not be affected in the event of a fire. However, dependant on meteorological conditions at the time of an incident could potentially be affected; their details are available in this plan to enable them to be informed in the event of a significant fire. The FRS will be consulted to provide advice on the message relayed to the receptors.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 26 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Receptor	Distances to site (m)	Contact details
Educational sites		
Dean Trust Ardwick 345 Stockport Rd, Longsight, Manchester M13 0LF	367 South (up-wind)	0161 972 2988
Armitage CE Primary School Rostron Ave, Ardwick, Manchester M12 5NP	435 South (up-wind)	0161 273 4654
The Manchester College Openshaw Campus, Ashton Old Rd, Manchester M11 2WH	570 East (up-wind)	0333 322 2444
Medlock Primary Wadeson Rd, Manchester M13 9UJ	660 West (up-wind)	0161 273 1830
St Anne's RC Primary Carruthers St, Manchester M4 7EQ	776 North (up-wind)	0161 273 2417
Ashbury Meadow Primary Rylance St, Beswick, Manchester M11 3NA	804 North East (up-wind)	0161 219 6630
School of the Resurrection Pilgrim Dr, Manchester M11 3TQ	900 North East (up-wind)	0161 223 3163
St Luke's C of E Primary Langport Ave, Manchester M12 4NG	994 South (up-wind)	0161 273 3648
Care homes and GPs		
Devonshire House 2 Devonshire Street North, Ardwick, M12 4BB, United Kingdom	678 South West (up-wind)	
Mary & Joseph House 217 Palmerston St, Manchester M12 6PT	931 North (up-wind)	0161 273 6881
West Gorton Medical Centre	936 South (up-wind)	0161 223 5226

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 27 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

2 Clowes St, West Gorton, Manchester M12 5JE		
Vallance Health Centre Brunswick St, Manchester M13 9UJ	979 West (up-wind)	0161 532 4141

18.2 AFTER A FIRE

Fire debris will continue to be turned using the onsite plant and dowsed as necessary, under the guidance of Fire and Rescue personnel or onsite competent staff. Debris will be turned and dowsed until site management, in collaboration with the FRS, confirm that the risk of fire has been adequately reduced. In some cases, such as larger lithium batteries, the risk of re-ignition is present, and the FRS may need specialist advice.

Thermal imaging technology will be used to support this risk assessment.

Metallic waste including fire damaged SMW will be treated in the shredder.

Any non-metallic residues will be kept separate and an assessment made to determine suitable recovery / disposal routes.

If debris appears to contain combustible wastes, stockpiles will be maintained at levels in accordance with EA guidance i.e. 20m*20m*4m and 6 metre separation from other combustible wastes and monitored in accordance with FPP. The hot load temporary quarantine area, which is capable of holding 50% of largest stockpile, will be used to store wastes involved in the fire.

It may remain necessary to continue to divert inbound material to alternative sites whilst the immediate after fire inspections and any necessary repairs are effected. This will take place as per contingency plans in place.

Fire water will be disposed of to a foul sewer with the permission of United Utilities or taken for specialised treatment at suitably authorised facilities.

The infrastructure and drainage will be inspected. As detailed above, it may be necessary to empty the interceptor and clear the drainage system of any accumulated firewater or debris. The concrete surface will be inspected for signs of fire damage that could affect the integrity and repairs undertaken if the integrity has been compromised and before the area is returned to active waste storage/ treatment.

Key infrastructure such as plant / electrics / telecommunications / CCTV etc. will be checked to ensure they are functioning and repaired as necessary.

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 28 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

A full investigation will take place including route cause, corrective actions to prevent reoccurrence, effectiveness of response. Stockpile Management and Fire Prevention Protocol and Emergency Contingency and Accident Management Plans will be reviewed and updated accordingly where required.

Any fire-fighting resources or pollution prevention equipment that has been consumed will be replaced without delay.

A learning debrief (Tool Box Talk) will take place to capture lessons for future improvement round process, procedures or capabilities. This debrief outcomes will be shared with the local FRS, and other relevant partners.

19.0 MONITORING COMPLIANCE WITH THE PLAN

The FPP is communicated to employees by means of a TBT and compliance with the plan is monitored visually on a daily basis during routine inspections. Safety Conversations are used to monitor employees understanding of the requirements.

Regular exercises on site to test the effectiveness of fire response are tested twice per year (as detailed in Emergency Contingency Plan) by drills and are documented in EHS Standard 14.16 – Emergency Contingency & Accident Management Plan folder.

- Q1. Are permits to work available for all contractors on site?
- Q2. Are the tonnage restrictions being followed?
- Q3. Are adequate roadways and firebreaks being maintained?
- Q4. Is the fire-fighting equipment available?
- Q5. Is there a designated quarantine area available?
- Q6. Are sources of ignition being controlled?

As detailed previously in plant and equipment section, plant and equipment are adequately serviced and maintained by appropriately trained or where required qualified personnel. Daily checks are undertaken and records kept.

Monthly stock checks will monitor and record residence times of wastes on site.

Safety Conversations are used to monitor employees understanding of the requirements.

Regular exercises on site to test the effectiveness of fire response are tested twice per year (as detailed in Emergency Contingency Plan) by drills and are documented in EHS Standard 14.16 – Emergency Contingency & Accident Management Plan folder.

OTHER STOCKPILE MANAGEMENT SAFETY CONSIDERATIONS

Reducing Falling Objects & preventing slips, trips and falls

Care is taken to ensure that scrap is stacked in a safe manner and there are no signs of stockpiles being unstable. Vehicles will not tip directly onto scrap stockpiles

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 29 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Flattened/baled cars or other baled waste are picked and placed at the base of stockpiles. Bales will not be used as support or separation walls.

Vehicles will not tip directly onto stockpiles. Lorry Drivers are instructed to tip a minimum of one car length away from the edge of stockpiles.

Oversized O/S material is inspected regularly to ensure items do not overhang or are unstable. If stability cannot be ensured, then physical means such as barriers are used as a temporary measure to provide a safe distance for pedestrians.

Only pedestrians authorised by the weighbridge to tip/ unload are allowed access to the stockpile areas. Pedestrians (inspectors and customers) must keep a minimum distance of at least an average car length away from the edge of the stockpile.

All pedestrians/ customers are controlled and as required escorted by site staff at all times while on site. Trained operatives will ensure tipping, loading and maintenance activities where customers/contractors are involved do comply with the relevant safe procedures as per company policy/risk assessments and Safe Working Procedures in place.

Pedestrians will keep to designated walkways where available and good housekeeping is maintained to minimise the risk of slips, trips and falls.

To allow site management to comply with controls and prove reasonable monitoring is taking place, the following key questions are asked regularly:

Q7. Are bales/ flattened cars stored at the base of piles?

Q8. Are there any obvious overhangs or stability issues?

Q9. Are all visitors accompanied on site?

Q10. Are employees using designated walkways?

Q11. Are lorry drivers tipping a minimum of a car length away from stockpile edges?

Q12. Are the edges of stockpiles routinely pushed up to minimise trips and slips?

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 30 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Fire Prevention Protocol Manchester
Appendix 1a Sensitive Human Receptors within 1km radius

DRAFT

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 31 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Fire Prevention Protocol Manchester Shredder
Appendix 1b Sensitive Ecological Receptors within 1km radius

DRAFT

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 32 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Fire Prevention Protocol Manchester
Appendix 2 Manchester Site Layout

DRAFT

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 33 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Fire Prevention Protocol Manchester
Appendix 3 Manchester Emergency Equipment plans

DRAFT

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 34 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Fire Prevention Plan Manchester

Appendix 4 EHS Standards Signposted in FPMP containing:

- EHS Standard 05.08 – Mobile Equipment
- EHS Standard 14.16 – Emergency Contingency & Accident Management Plan
- EHS Standard 10.23 – Hot Works

DRAFT

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 35 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022

Fire Prevention Plan Manchester
Appendix 5 Emergency Contingency and Accident Management Plan

DRAFT

Reference	Sims Group UK Limited_ Manchester Fire Prevention Plan	Page number	Page 36 of 36
Authorised by	J Bissett DRAFT awaiting EA Approval	Issue date	June 2022