TRAFFORD PARK ENVIRONMENTAL PERMIT VARIATION: WET SEPARATION PROCESS

Fire Prevention Plan

Prepared for: S. Norton & Co Limited

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1.0 Introduction

1.1 Report Context

S. Norton & Co Limited (S Norton) has retained SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) variation application for the Trafford Park Metal Recycling Facility located at Tenax Road, Trafford Park, Manchester, M17 1JT under the Environmental Permitting (England and Wales) Regulations 2016 (as amended). Herein the facility will be referred to as 'the Site'.

S Norton seek to vary the EP for the Site to include the following changes;

- Addition of a wet separation treatment process and water treatment unit;
- Additional prescribed activity under Table S1.1 in the permit in the form of an existing mechanical separation process via a standalone Sensor-Based Sorting (SBS) Plant;
- Increase in annual waste throughput to 750,000 tpa;
- Extension of the permit boundary to include land to the west of the Site, including a new release point to sewer; and
- Addition of new EWC codes 17 04 10*, 19 02 04* and 19 12 11* in the permit due to the changes in the classification of hazardous waste.

In addition, the following amendments are proposed as part of the variation:

- Amendment to the prescribed activity under Table S1.1 in the permit ref. AR6 to include mechanical separation via Eddy-Current Separation (ECS) Plant as a prescribed activity and a waste activity due to a misdescription in the existing permit; and
- Amendment to the location of an existing authorised discharge to sewer.

This report follows the Environment Agency (EA) guidance for Fire Prevention Plans (FPPs)[2] and details the required mitigation and management methods to prevent a fire of combustible materials stored on Site.

The information contained within this FPP is presented in accordance with the EA's FPP template updated January 2021 and is designed to meet the 3 main objectives of the EA 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 Site

[2] Fire Prevention Plans, January 2021.

2.0 Types of Combustible Materials

2.1 Combustible Waste

The Site is permitted as a multi-activity installation permit for ferrous and non-ferrous metal recycling to process up to 750,000 tonnes per annum (tpa). In total up to 270,000m^3 of waste can be stored on Site at any one time.

The Site includes the following prescribed activities: metal fragmentiser (shredder), Shredder Waste Advanced Processing Plant (SWAPP) facility, lead acid battery repackaging, non-ferrous metal processing, treatment of waste from electrical and electronic equipment and temporary storage of hazardous waste.

The Site layout, including waste storage locations is shown on Drawing 02. The SWAPP facility is run separately by S Norton's subsidiary company Axion Polymers (Axion) and lies within the Site boundary under the EP.

The EP allows for the following types of waste to be accepted on Site which are defined as 'combustible materials' in the FPP Guidance:

- General light iron and large domestic appliances (LDA);
- De-polluted and un-depolluted End of Life Vehicles (ELVs);
- Lead Acid Batteries;
- Mixed waste containing any combustible wastes; and
- Mixed WEEE.

The list of wastes permitted for acceptance to the Site for vehicle storage, depollution and dismantling (authorised treatment) facility is included within Table 2-1 below.

Table 2-1
List of Permitted EWC Codes for Vehicle Storage, Depollution and Dismantling (Authorised Treatment) Facility

EWC Code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14 16 06 and 16 08).
16 01 03	end of life tyres
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 07*	oil filters
16 01 12	brake pads other than those mentioned in 16 01 11
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 21*	hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14

EWC Code	Description
16 01 22	Components not otherwise specified
16 06	Batteries and accumulators
16 06 01*	lead batteries
16 06 05	gases in pressure containers other than those mentioned in 16 05 04
16 08	spent catalysts
16 08 01	spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
16 08 03	spent catalysts containing transition metals or transition metal compounds not otherwise specified

The list of wastes permitted for acceptance to the Site for waste electrical and electronic equipment authorised treatment facility is included within Table 2-2 below.

Table 2-2
List of Permitted EWC Codes for Waste Electrical and Electronic Equipment Authorised Treatment Facility

EWC Code	Description
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	wastes from the photographic industry
09 01 11*	single-use cameras containing batteries included in 16 06 01, 16 06 02 or 16 06 03
09 01 12	single-use cameras containing batteries other than those mentioned in 09 01 11
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 02	wastes from electrical and electronic equipment
16 02 09*	transformers and capacitors containing PCBs
16 02 10*	discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from discarded equipment
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	batteries and accumulators
16 06 01*	lead batteries

EWC Code	Description
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
16 06 04 16 06 05	alkaline batteries (except 16 06 03) Other batteries and accumulators
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 05 01)
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

The list of wastes permitted for acceptance to the Site for metal recycling/shredding is included within Table 2-3 below.

Table 2-3
List of Permitted EWC Codes for Metal Recycling

EWC Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
10	WASTES FROM THERMAL PROCESSES
10 09	wastes from casting of ferrous pieces
10 09 05*	casting cores and moulds which have not undergone pouring containing dangerous substances
10 09 06	casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 07*	casting cores and moulds which have undergone pouring dangerous substances
10 09 08	casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 10	wastes from shaping and physical and mechanical treatment of metals and plastics

EWC Code	Description
10 10 05*	casting cores and moulds which have not undergone pouring, containing hazardous substances
10 10 06	casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 07*	casting cores and moulds which have undergone pouring, containing hazardous substances
10 10 08	casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
11	WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDROMETALLURGY
11 05	wastes from hot galvanising processes
11 05 01	hard zinc
11 05 02	zinc ash
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 02	ferrous metal dust and particles
12 01 03	non-ferrous metal filings and turnings
12 01 04	non-ferrous metal dust and particles
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 02	plastic packaging
15 01 04	metallic packaging
15 01 06	mixed packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and waste from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 06	end-of-life vehicles containing neither liquids nor other hazardous components
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	components not otherwise specified
16 02	discarded equipment and its components

EWC Code	Description
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13 (ferrous and non-ferrous metal waste only)
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15 (ferrous and non-ferrous metal waste only)
16 06	batteries and accumulators
16 06 01*	lead batteries
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 06	Insulation materials and asbestos- containing construction materials
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER WATER FOR INDUSTRIAL USE
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash
19 10	wastes from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous wastes
19 02 03*	fluff-light fraction and dust containing dangerous substances
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03
19 10 05*	other fractions containing dangerous substances
19 10 06	other fractions other than those mentioned in 19 10 05

EWC Code	Description
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 39	plastics
20 01 40	metals

2.1.1 List of Additional Wastes

Due to recent changes in the classification of hazardous waste in order to continue to process waste types already treated at the site and as a result of the proposed additional wet separation process as part of the Permit Variation, S Norton require additional waste codes to be included in the permit.

The list of proposed additional wastes to be permitted for acceptance to the Site is included within Table 2-4 below.

Table 2-4
List of additional EWC codes and descriptions

EWC Code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 10*	cables containing oil, coal tar and other hazardous substances
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 04*	premixed wastes composed of at least one hazardous waste

EWC Code	Description
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 11*	other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11

2.2 Combustible waste produced on Site

The Site produces the following combustible wastes on Site:

- Shredder Light Fraction (SLF) and Eddy Current Separator (ECS) Waste containing aggregate, textiles, metals, plastic and rubber;
- Small mixed WEEE (SMW);
- Rubber and textiles – from ELVs;
- Wood – appear in civic amenity scrap materials and vehicle bodies etc;
- LDA's rejected for treatment;
- Lead Acid Batteries (packaged for onward reprocessing);
- Oils – hydrocarbon liquids, electric motor oil, hydraulic oils etc;
- Oily rags;
- Fuel waste; and
- Fragmentiser waste – shredder residue from the processing of light iron, ELV's and WEEE.

The SWAPP produces several combustible waste fractions which are destined for recovery:

- Small mixed WEEE (SMW);
- Oversize containing large plastic, rubber, foam and metal (has the potential to contain batteries);
- MAP08 (predominately plastic and rubber chip);
- MAP30 (mixed material 5-120mm in size containing plastic and rubber);
- Solid Derived Fuel (SDF); fraction that is <10% plastic with some textiles and combustible materials;
- Mill dust (<5mm plastic)
- Agg0X (dense plastic and stones); and
- High belt – a mix of heavy plastic and rubber.

2.3 Persistent Organic Pollutants

Wastes stored on Site could potentially contain Persistent Organic Pollutants (POPs). This is predominantly small mixed WEEE (SMW) which is stored adjacent to the shredder in the southeast area of the Site. Once processed in the shredder, SMW residue is transferred and stored adjacent to SWAPP1 in the northeast area of the Site as illustrated on Drawing 02. This waste is segregated from other waste types. All of the processed plastic containing POPs fractions are stored separately pending removal off Site.

2.4 Other Combustible materials

The Site stores non-waste materials that are not covered by the FPP Guidance but are considered in this FPP due to the potential for them to cause or increase the impact of a fire on the Site. The materials and their storage arrangements are shown in Table 2-4 below and illustrated on Drawing 02.

Table 2-4
Non-Waste Materials: Storage Arrangements

Type	Storage Arrangement	Storage Location
White diesel (45,000 litres)	A 45,000 litre tanker contained in secondary concrete bunding, capable of containing at least 110% of the total volume of all the containers.	Adjacent to the Site office at the Site entrance and adjacent to the depollution area in the southwest area of the Site
Hydraulic oil (Equivis 46) (2,700 litres)	A 2,700 litre tanker (same bund as above)	
Hydraulic oil (Equivis 46) (2,700 litres)	A 2,700 litre tanker (same bund as above)	
Rubia Works 4000 oil (2,700 litres)	A 2,700 litre tanker (same bund as above)	
DynaTrans ACX 30 (KTR 430) oil (2,700 litres)	A 2,700 litre tanker (same bund as above)	
DynaTrans ACX 50 (KTR 450) oil (2,700 litres)	A 2,700 litre tanker (same bund as above)	
Waste oil (2,700 litres)	A 2,700 litre tanker (same bund as above)	
AdBlue (2,500 litres)	A 2,500 litre tanker (same bund as above)	
Oily rags	Oily rags stored in a lidded container	Adjacent to SWAPP Control Room in metal recovery plant building
Gas bottles and cylinders	Gas bottles and cylinders stored in cages	Adjacent to the workshop and mobile plant storage in the west area of the Site

Type	Storage Arrangement	Storage Location
Gas bottles and cylinders (orphaned)	Gas bottles and cylinders (orphaned) in cages	Adjacent to the workshop and mobile plant storage in the west area of the Site

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 is kept in the weighbridge and in the Site security office located at the entrance to the docks. The Site security office is manned 24 hours a day, 7 days a week; therefore, the plan is accessible to any relevant third party, including Greater Manchester Fire Rescue Service (GMFRS) when the Site is closed. GMFRS will be issued an electronic copy and have been notified that a hard copy of this plan is with security. A copy is also available in electronic format on the IMS (Integrated Management System).

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. Contractors working on Site will be made aware as part of on-site working procedures.

3.2 Testing the plan and staff training

3.2.1 Staff training and procedures

Staff receive training on the use and selection of fire extinguishers, the sump shut-off (penstock) valve, Site evacuation, fire safety and all relevant emergency procedures.

All staff and contractors working on Site are 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 is regularly refreshed particularly in the event of non-compliance.

Certain staff members on Site are trained as Fire Marshals. There are 5 in total. There is always at least one Fire Marshal present on Site.

The procedures for fires discovered on Site are provided both in S Norton's Working Plan and on-site notice boards.

S Norton 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.

S Norton is currently in the process of instigating further structured bespoke training for staff, including firefighting, fire marshal and incident management courses. Simulated exercises that replicate mock fire scenario incidents on site will also be carried out on a regular basis.

3.2.2 Testing the FPP

This FPP will be implemented across the Site and all fire management equipment will be maintained in line with schedules set by S Norton.

S Norton conduct a test of the FPP annually, 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.

A weekly fire alarm test is carried out and documented in accordance with the Fire Evacuation and Alarm Testing procedure (SP-4.4.7-01), included as appendix FPP02. HSE representatives are responsible for carrying out the tests and completing the Fire Alarm System Log.

If any issues are found during these fire drills, the FPP will be updated or amended accordingly and Site operatives will be re-trained.

This FPP is implemented across the Site and all fire management equipment is tested regularly on a weekly basis through fire drills with different elements of fire management equipment used.

Regular checks are made of all escape routes, and equipment to ensure they are unobstructed and in good working order.

All fire practices and fire system tests are recorded on the Fire Practice/Fire System Test sheet (EF-4.4.6-01-30) which is included as appendix FPP-03.

4.0 FPP contents

4.1 Activities at the Site

The Site operates as a ferrous and non-ferrous metal recycling facility. The Site is used for the storage and treatment of materials with a substantial recyclable metallic content. Waste materials received are exposed to processes to facilitate size reduction, densification and to improve the metal content to a required quality for charging furnaces at a melter and may include the following activities:

- Separation and sorting of waste types;
- Size reduction by compaction;
- Depollution of vehicles;
- Metal fragmentiser for shredding waste;
- Lead acid battery repackaging;
- Metal fragmentiser for shredding small mixed WEEE;
- Gas cutting;
- Shredding of metals and tyres; and
- Temporary storage of hazardous wastes (which include oils and other fluids from depollution of ELVs, soiled absorbent material, wastes from electrical and electronic equipment);

Shredding/fragmentising, shearing and screening will occur at fixed locations. The location of other treatment processes not requiring fixed plant such as gas cutting may be located in any area with adequate pollution prevention and control measures in place.

Scrap metal wastes are received at the Site delivered by either S Norton's company vehicles, or directly by suppliers and members of the public. Wastes from members of the public may include light iron, copper, ferrous and non-ferrous.

Wastes can include the following types:

4.1.1 Ferrous Scrap Metals

- Light Iron/Frag Feed – Light grade metals suitable for processing in a fragmentiser plant i.e. end-of-life vehicles (ELVs), white metal goods etc. ELVs are occasionally baled once depolluted.

- Profile – Metal sheets used to stamp out metal components prior to forming i.e. factory off-cuts
- Constructional – Thick grade metals not always suitable for processing in the shearing plant
- Shearing – Thick grade metals, typically greater than 6mm, suitable for processing in a shearing plant i.e. pipelines and reinforcing-bar
- Cast iron – Drain covers, ductile, pipe work

4.1.2 Non-Ferrous Scrap Metals

Received as non-ferrous at the Site or recovered from other scrap sent to the Site. These metals, once received or recovered are sold on with minimal processing such as nibbling and baling.

- Discrete items – Non-ferrous metals i.e. lead acid batteries, aluminium window frames, copper pipes
- Cable – Electrical cable from a variety of sources both industrial and household
- Shredder Non-Ferrous (SNF) – non-ferrous and non-metals recovered by the shredding process. The SNF is forwarded on from other Sites for further processing at this Site.

4.1.3 Incidental Materials

These materials tend to be incidental to the metals recovery operation. Typically, this can include:

- Non Metallics – paint flakes and chips from coated materials, glass, plastics, rubber and textiles derived from ELV's,
- Metallics – Metal particles

4.1.4 Lead Acid Batteries

These come to Site from smaller suppliers and also as a by-product of the depollution process. Lead acid batteries are not treated for recycling. Instead, they are bulked and stored in a separate area of the Site for onward transport to a specialist recycling company. Whilst in storage they are stacked in acid resistant covered sealed skips or bins.

4.1.5 ELVs

ELVs come into Site either in depolluted baled form or as un-depolluted whole vehicles. Baled ELVs are stored adjacent to the pre-shredder prior to processing via the pre-shredder and then main shredder. Un-depolluted ELV's are taken straight to the depollution facility where they are depolluted before being processed through the shredder.

4.1.6 Activities in SWAPP

The SWAPP accepts material via HGV, delivered primarily from S Norton's Liverpool site with approximately 2,500 tonnes of material a week and a further 400 tonnes is produced from the shredder onsite. All feed has been processed through a shredder. S Norton are undergoing work to replace the shredder with new equipment and currently, there is no storage of whole SMW on site. Instead, SMW is processed at S Norton's Bankfield facility. Once processed, SMW residue is transferred to Trafford Park.

Two different materials are processed; Shredder Light Fraction (SLF) and processed Small Mixed WEEE (SMW). SLF originates from light iron feed which has been through a shredder and processed so that most of the metals have been removed. SMW originates from small mixed WEEE and bulky mixed plastics and has been processed through a shredder to break up the material and remove metals. Lithium-ion batteries are removed by hand-pickers on the output stream.

4.2 Site Plan

The Site is centred on National Grid Reference SJ 78829 97267, Land/premises at Tenax Road, Trafford Park, Manchester, M17 1JT and is approximately 5.5.km west of Manchester city centre, and 3km southwest of Salford. The Site is accessed via a track approximately 200m off Tenax Road.

The Site is roughly rectangular with a small area in the extended permitted area to the west excluded from permitted activity. Refer to Site boundary and Site layout in Drawing 02.

4.3 Plan of sensitive receptors near the Site

The surrounding land uses and local receptors and cultural and natural heritage receptors within 1km are shown on Drawing 001. The Site is predominantly surrounded by commercial/industrial premises. There are no residential premises within 1km of the Site.

A summary of the immediate surrounding land use is provided in Table 4-1 below.

Table 4-1
Surrounding Land Use

Boundary	Description
North	Commercial and industrial (C&I) premises, including Oak Tyres, Total Ninja, XPO Logistics, TAG Forklift Truck Services, and just beyond Trafford Park Road with further C & I premises including PG Tips, Unilever Foods, Procter & Gamble, Essity, Pampers, and further beyond approximately 800m is the Manchester Ship Canal.
East	Mellors Road with C&I premises, including T G Nuttall Packaging, Creamline Dairies and Expeditors. Trafford Park Road, Millington Road and Mosley Road just beyond approximately 400 to 500m with C&I premises, including Rye Motors, Dean & Wood, The Fragrance Shop, Auto Wrap Manchester, Davis & Moore, Per-Scent Limited, MediaCo, Muller Milk Manchester, Velro, CHEP UK, Geo Amey P E C S, Redwing Centre and Mercedes-Benz, and beyond approximately 900m is the Manchester Ship Canal. Trafford Ecology Park is an 11-acre Local Nature Reserve that lies approximately 200m northeast that includes surface water.
South	ACP (Concrete) Ltd immediately south with Village Way (A5081) approximately 500m to the south with C&I premises, including LANXESS Solutions UK, E O C (UK), Europcar, GSF Car Parts, Illingworth Ingham, Mylson, Brandon Hire Station, Trafford Tyres, FedEx Station, Parkway Prestige, Screwfix and Depot Climbing Manchester.
West	C&I premises, including The Vella Group, Fleet Factors Ltd, Nationwide Crash Repair Centres, Komlur Bare Babies, Kerry Logistics and Altrad Generation Hire & Sales lying immediately adjacent to the Site with A576 road just beyond and other C&I premises including Architectural Steel, D Walton, AS 24, Manheim Manchester Auction, Orion Trade Centre, Salvo 1968 / Ronanini UK, MAN Truck & Bus UK, Toolstation, DHL Parcel UK, LUR Ltd, Sadaqat Global, Neville Johnson, SHIFT 4, Dogs Aloud Daycare, PaintWell, Premium Roofing Supplies, FSW Limited, CCF Manchester and CEF.

The immediate surrounding land use is described in detail below.

4.3.1 Commercial and Industrial

The Trafford Park industrial/commercial area surrounds the Site's boundary in all directions, with premises located immediately adjacent to the Site's boundaries in all directions.

4.3.2 Local Transport Network

Trafford Park Road is located approximately 300m to the northeast connecting smaller roads including Mellors Road approximately 150m east of the Site, and Millington Road and Mosley Road just beyond. Moorings Road and Centenary Way lie approximately 300m to the north. Village Way (A5081) runs parallel approximately 500m to the south. The A576 runs adjacent to the Site approximately 200m to the west with Ashburton Road West just beyond connecting smaller roads, including Lyons Road, Bailey Road and Richmond Road approximately 650m to the west.

4.3.3 Educational

There are no educational receptors within 1km of the Site's EP boundary.

4.3.4 Residential

There are no residential properties within 1km of the Site's EP boundary.

4.3.5 Recreational

There are no recreational facilities within 1,000m of the Site's boundary, although there is some green/open space approximately 200m east of the Site within Trafford Ecology Park LNR.

4.3.6 Surface Water

Trafford Ecology Park Local Nature Reserve (LNR) lies approximately 200m northeast and includes an oasis (Trafford Ecology Park Lake), which is 2.47 acres in size and is located at Grid reference SJ792974. The Manchester Ship Canal is approximately 700m to the north of the Site spanning to the east and the west. The Bridgewater Canal is located approximately 1,100m to the south and 700m to the southwest.

4.4 Ecology

A 1km radius was employed in identifying all ecological receptors of importance with the exception of Sites of Special Scientific Interest (SSSI), for which a 2km radius is recommended under EA draft guidance[3]. A search on MAGIC identified that there is one feature of ecological importance within the vicinity of the Site:

- Trafford Ecology Park Local Nature Reserve (LNR), located approximately 200m east of the Site.

Searches on MAGIC confirmed there are none of the following within 1km of the EP boundary:

- Ancient Woodland;
- Ramsar's;
- Special Protection Area's (SPA);
- Areas of Outstanding Natural Beauty;
- National Nature Reserves;
- Special Areas of Conservation (SAC); and

[3] EA Draft guidance 'How to complete a location check in Opra' 2011

- National Parks.

Searches on MAGIC confirmed there are no SSSI within 2km from the Site's boundary.

4.5 Cultural and Heritage

4.5.1 Listed Building

Searches on MAGIC identified the following within 1km of the EP boundary:

- 2 Grade II listed buildings to the southwest, approximately 950-1,000m from the EP boundary.

4.5.2 Scheduled Monument

There are no Scheduled Monuments within 1km of the Site's boundary.

There is one Registered Park and Garden within 1km of the EP boundary, this is Weaste Cemetery, located approximately 950m northeast of the Site.

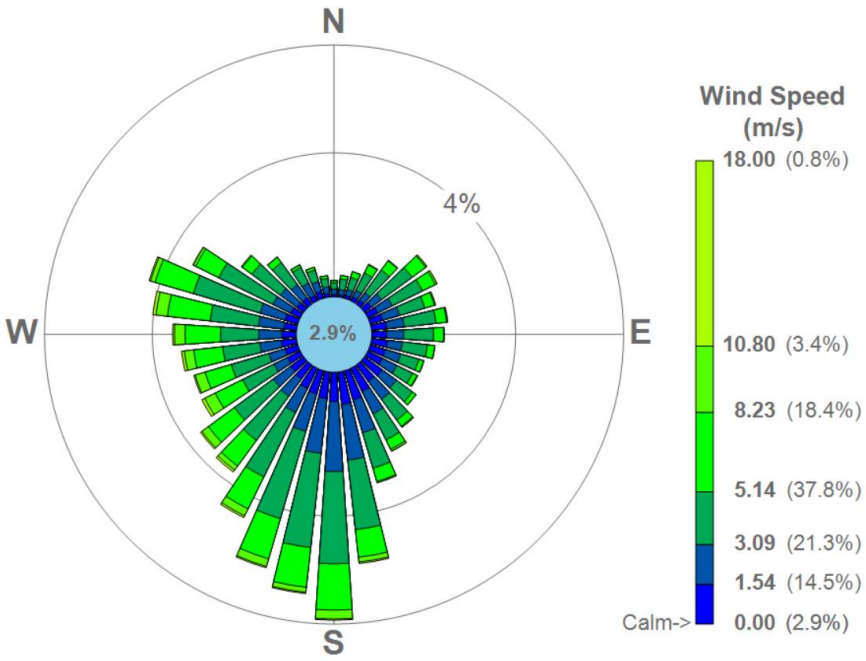
The search on MAGIC confirmed that the following features do not lie within 1km of the Site:

- World Heritage Sites or Registered Battlefields.

4.6 Windrose

A wind rose from Manchester Airport Meteorological Station, located approximately 13.5km south southeast, providing the frequency of wind speed and direction from 2018 is presented in Figure 4-1 below. The wind rose shows that winds from the south, southwest and west are most frequent. Winds from the north, southeast and northeast are less frequent.

Figure 4-1
Manchester Airport Meteorological Station, 2014-2018



5.0 Manage common causes of fire

5.1 Arson

The Site has a number of security measures in place to limit the likelihood of arson or vandalism including:

- Enclosure on all sides of the Site comprising of high fencing and barbed wire;
- Single access lockable Site entrance gate locked out of hours;
- External security firm that patrols the Site out of hours;
- Day shift which operates between 6:45am and 5pm and a night shift which operates between 5:30pm and 5:30am and is manned by 6 staff;
- 24-hour surveillance CCTV coverage through a network of cameras. These are available for viewing in the Site managers office and the security office. Senior management also have 24-hour access to the cameras via a mobile phone app;
- An alarm system; and
- A visitor sign in system.

All S Norton staff are trained to challenge any persons who they believe should not be on Site. All staff are in constant radio coverage of Site management.

In the event of a breach of security at the Site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the within the IMS on the event log. Records maintained will include inspections and maintenance of doors and locks, breaches of security, investigations and actions taken.

The gates and fencing are inspected on a daily basis to identify any weaknesses or defects. Any defects identified are repaired with a temporary solution within 24 hours, with a permanent fix implemented within 7 days, unless a timescale is otherwise agreed with the EA. All inspections and any defects, damage or repairs will be recorded in the event log.

5.2 Plant and equipment

Plant and equipment are maintained in accordance with the manufacturer's recommendations. S Norton have a dedicated maintenance team based onsite. All external contractors are made aware of the relevant contents of the FPP.

All maintenance is recorded and scheduled via a computerised maintenance management system (CMMS). The maintenance team undertake inspections in line with the schedule. Any faults are recorded on the CMMS and actioned accordingly. Defects can be raised by the Site management and operators through the online system which automatically alerts the maintenance team who can then action the job.

Inspection of plant and equipment will be undertaken on a daily basis, before use, to check for faults and to ensure appropriate safeguards are in place (see appendix FPP-05 for pre-use check sheets). This procedure also covers general housekeeping and cleaning of plant and all equipment on Site.

All mobile plant has either built in fire detection and fire suppression equipment fitted or suitable fire extinguishers within the cab.

At the end of each day operators clean down the plant and equipment of any potentially combustible material.

All mobile plant and static plant operators are equipped with 2-way radios to enable communication with each other and Site management.

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 and not used until the equipment can be repaired or replaced.

All machines in the SWAPP are serviced monthly and service records are kept for reference.

5.2.1 Fixed equipment

The following items of fixed plant or equipment are held on Site:

- *Shearing plant;*
- *Eddy Current Separator (ECS) plant;*
- *Sensor Based Sorting (SBS) plant;*
- *Pre-shredder (currently being replaced with new equipment);*
- *Shredder (currently being replaced with new equipment); and*
- *Shredder Advanced Processing Plant (SWAPP) facility;*

5.2.2 Mobile plant

The following items of mobile plant are held on Site:

- *Cat 325 Excavator x 3*
- *Cat 330 Excavator x 1*
- *Cat 972M Wheel loader x 5*
- *Leibherr R934C Excavator x1*
- *Linde Fork Lift H2 x 3*
- *Sennebogen 835 x 4*
- *Cherry Picker*

The fixed equipment and mobile plant that will be held on Site is detailed in the Site's asset list which is included as appendix FPP-06.

All plant and equipment used on Site will be maintained in accordance with manufacturer's recommendations with checks recorded on the companies CMMS.

Mobile plant is kept away from combustible waste. This is achieved by allocating areas for mobile plant for storage when not in use.

Any mobile plant not in use or requiring maintenance is stored in the designated mobile plant storage area as illustrated on Drawing 02.

5.3 Electrical faults including damaged or exposed electrical cables

5.3.1 Electrical certification

All electrics on Site will be fully certified by a qualified electrician and a record of the certification will be kept.

5.3.2 Electrical equipment maintenance arrangements

Regular safety inspections will be carried out by a qualified electrician to ensure risks are minimised. Electrical equipment will be visually inspected prior to every use to ensure it is free from obvious damage and that it is fit for purpose. All building electrics are fully certified by a qualified electrician.

Fixed Electrical Condition Monitoring and assessment is completed via testing every 3 years. Annual PAT testing of any on Site portable electrical appliances is carried out.

Records of regular safety inspections will be kept and faults and/or daily electrical maintenance will be recorded on the event log.

5.4 Discarded smoking materials

5.4.1 Smoking on Site policies

There is a designated smoking area located by the Site office away from any combustible waste or hazardous and flammable materials. There are 2 designated smoking areas at SWAPP, at least 6m away from the plant and day-to-day operations including storage and processing of waste.

Smoking is not permitted inside the Site boundary other than the designated areas.

5.5 Hot works safe working practices

Any items which arrive on Site that cannot be processed directly by shearing will be reduced in size by hot cutting.

S Norton operate a permit to work system (records of these are available on the IMS). No hot works are undertaken by staff unless they are trained and have the relevant permit to work.

The standard operating procedure for the use of hot cutting equipment is detailed in SOP-047, included as appendix FPP-07. Prior to hot works a personal safety pre-task assessment is carried out.

All hot works are conducted in a cleared area of the Site at least 6m from any combustible wastes, stockpile or mobile plant.

Operators ensure that after hot works have been carried out, the surrounding area is checked for smouldering material and that materials are doused down and extinguished effectively.

Any hot works cease within 1 hour of Site closure and dousing down is carried out for at least 15 minutes following burning with material spread out at least 10 metres away from any stockpile. No processed material is added to the stockpile until the following day.

A Site operative performs a continuous fire watch during the hot work and for a period of time after the work is completed during which burnt material will be checked with a heat gun, if available, to ensure any residual heat has been extinguished.

5.5.1 SWAPP

Welding occurs occasionally at the SWAPP for which Axion operate a fire watch procedure.

Prior to welding, the area is dampened, and fire mats are used when appropriate. During welding a fire watchman is required with a fire hose to hand to watch for any sparks. The area is subject to fire watch for 2 hours following completion of any works.

5.6 Industrial heaters

5.6.1 Use of industrial heaters

No industrial heaters such as portable electric bar heaters or paraffin heaters are utilised on Site.

5.7 Hot exhausts and engine parts

Vehicles are turned off when not in use. During shifts, regular fire watches are carried out by operators on hot exhausts and engine parts of plant equipment operating on the Site. Mobile plant (hot exhausts) do not operate near flammable sources (tanks/containers of flammable substances clearly signed and separated by barriers). During out of hours, all mobile plant is parked at least 6m away from the Site perimeter or any combustible material in the mobile plant (out of hours) storage area illustrated on Drawing 02.

5.8 Ignition sources

Potential ignition sources include hot exhausts and engine parts, discarded smoking materials, and hot works (all described above). All ignition sources will be kept a minimum of 6m away from combustible and flammable wastes. No naked lights will be permitted on Site.

Standard Operating Procedures (SOPs) and risk assessments are in place for staff and contractors when undertaking hot cutting. No hot works will take place near flammable substances. All staff who use hot cutting equipment are trained in the use of it and the training is recorded on the IMS.

5.9 Batteries

Lead acid batteries are received on Site but are not treated for recycling. Instead, they are bulked and stored for onward transport to a specialist recycling company. Whilst in storage they are stored in dolav crates which are covered. Safe operating procedures are followed while handling and storing these materials. Any batteries are placed away from any combustible material and stored for a maximum of 6 months. No more than 50 tonnes of batteries are held at any one time.

5.9.1 Batteries in end-of-life vehicles (ELVs)

All batteries are removed from ELVs during the first stage of the depollution process as detailed in the vehicle depollution standard operating procedure (SOP-023) which is included as appendix FPP-15.

The batteries are stored separately in a covered container away from other combustible waste. The battery container is taken to the battery storage area of the Site once full. Any damaged batteries are segregated and removed off Site.

5.10 Leaks and spillages of oils and fuels

Inspection of any spillages or leaks from containment areas or from Site vehicles will be completed daily. The results of all daily monitoring will be recorded on the daily noise, vibration and dust inspection checksheet (EF-4.4.6-01), which is included as appendix FPP-013.

In the event of any potentially polluting leak or spillage occurring on Site the protocol found within the Site Emergency Action Plan (OCD 028), included as appendix FPP-10, will be followed and the following actions will be taken:

- Minor spillages will be cleaned up immediately, using the spill kits located around the Site and marked on the Site plan. The resultant materials will be placed into containers and will then be removed from the Site and disposed of at a suitably permitted facility. The incident will be recorded on the event log.
- 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 Site's permitted boundary or entering surface water or drains. Where necessary, booms and suitable absorbent materials will be used to control movement. The spillage will be cleared immediately

using the spill kits located around the Site and marked on the Site plan, and placed in containers for offsite disposal, and the EA will be informed.

- If a spillage cannot be controlled using available equipment the penstock valve will be closed immediately and not reopened until the spillage has been cleaned up.

5.11 Build-up of combustible waste, dust and fluff

S Norton will adopt good housekeeping measures on Site and will undertake regular cleaning using brooms, mobile plant and wash down hoses/jet wash (if necessary) to prevent a build-up of litter and dust on Site.

The Site is inspected daily for dust and combustible material and recorded on the daily noise, vibration and dust inspection checksheet (EF-4.4.6-01) included as appendix FPP-13. The Site is also inspected on a weekly basis and this is recorded on the weekly environmental inspection checksheet (EF-4.4.6-01-07), included as appendix FPP-14.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer. This will include corrosion prevention where applicable.

Site access roads and operational areas are maintained and swept regularly to reduce dust generation. Daily visual inspection of the Site and Site boundary is carried out by Site personnel.

5.12 Reactions between wastes

There are no incompatible wastes which would cause reactions in the list of authorised wastes. Strict acceptance and control of waste procedures implemented on Site, as illustrated in Appendix FPP-08 and summarised below, ensure that only permitted wastes are accepted.

- All wastes arriving on Site are checked visually at the weighbridge by Site operatives to ensure that the contents correlate with the description on the associated paperwork and that no materials of unknown composition are accepted at the Site.
- Once the grade of material has been identified, the supplier will be directed to the designated tipping /unloading area within the Site, where the material will then undergo a more detailed visual inspection. When the receiving material is being loaded onto the designated stockpile, items found to be hazardous e.g. asbestos are removed from the load and isolated for further inspection.
- Any items to be found hazardous are either rejected, quarantined or disposed of in the designated hazardous waste container. All staff are trained to follow the company's environmental action plan should a hazardous item be discovered.
- Unauthorised wastes will be immediately removed to the dedicated quarantine area and removed off Site to a suitably licenced facility within 5 working days.
- All waste streams are segregated on Site to prevent any reactions between wastes which may cause self-heating and subsequently combustion.
- In addition, all stockpiles are subject to daily temperature checks by the day shift both in the morning and afternoon using handheld sensor FLIR E5 monitors, which are recorded on the stockpile temperature checksheet (EF-4.4.6-01-33) included as appendix FPP-12.

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 Site's acceptance and control of waste procedure (QP-8.3-02) included as appendix FPP-08, each load is visually inspected as it is unloaded to ensure compatibility with accompanying delivery notes, therefore minimising prohibited wastes and the acceptance of hot loads.

Instructions are given to suppliers to ensure no hot loads are accepted on Site.

Should a hot load be deposited on Site, it will immediately be removed to the designated quarantine area on Site where it would be subject to dousing using hoses connected to the internal ring main system. This area is large enough to leave 10m circumference around the zone. The quarantine area is clearly marked and is kept clear at all times.

Any fire damaged waste will be removed from Site to a suitably licenced facility for disposal unless it can be processed safely on Site.

5.14 Hot and dry weather

Stockpiles are subject to daily temperature checks by the day shift both in the morning and afternoon using the handheld thermal monitor in accordance with the stockpile temperature checksheet (EF-4.4.6-01-33) included as appendix FPP-12. Stockpiles are monitored throughout the day by staff who are trained and vigilant to look out for any early signs or detection of hot spots or emissions from material.

Storage is kept to a minimum duration on stockpiles deemed to be high risk, such as metal tunings. There are no highly reflective surfaces on the Site.

6.0 Prevent Self Combustion

Effective stock management limits the likelihood of the self-combustion of materials stored on Site. The controls in place to reduce the risk from fire are summarised as follows:

- Effective acceptance and control of waste procedures where all deliveries are checked when unloaded. Checks include both the paperwork and visual checks of the full contents of the load;
- Storage times are kept to the minimum;
- Staff are trained to monitor for any potential heating of stockpiles; and
- A quarantine area is kept available.

Should the wastes be found not to conform during the visual inspection, then the waste will be removed to the designated quarantine area as appropriate (see section 5.13 above).

Only wastes included in the EP are accepted at the Site.

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

6.1 Manage storage time

A summary of the storage times for wastes received is provided in Table 7-1 and 7-2 further below.

6.1.1 Method used to record and manage the storage of all waste on Site

All waste arriving on Site by road passes over the weighbridge where the weight and EWC code of the material is recorded on the company's electronic weighbridge recording system. A weighbridge ticket/Duty of Care waste transfer note is produced for the material which details the date, time, vehicle registration number, name of carrier, waste carrier registration number and weight of materials.

Any untypical movements of hazardous waste such as batteries is subject to separate legislation and this movement is recorded using the hazardous waste consignment notes (HWCN).

These are completed and kept in electronic form on the IMS.

Material is accepted on Site in accordance with the Site's permit and under the Acceptance and Control of Waste procedure (QP-8.3-02) included as appendix FPP-08. Full loads which do not meet the material specification are rejected. Loads in which non-conforming products are found are dealt with following the non-conforming product procedure (P-005) included as appendix FPP-09 and Emergency Action Plan (OCD 028) included as appendix FPP-10.

Suitably qualified Site personnel will carry out daily checks of the Site to identify the risks and inspect storage areas and stack height. This ensures that the Site does not reach a level of overcapacity in respect to storage.

It is not anticipated that seasonal variations will result in excessive waste stockpiles. Typically, there is a greater feed of materials in summer months, however, demands are met on Site through strategizing collections and dispatches of processed material to avoid excessive stockpiling.

6.1.2 Stock rotation policy

The Site operates a 'first in, first out' procedure for processing materials including light iron, WEEE and ELVs. All materials are processed daily to avoid excessive stockpiling of potentially combustible materials.

A record of all waste accepted at the Site is kept in electronic form on the IMS including quantity, characteristics, and the date and time of delivery. Processed waste is clearly segregated to ensure the principal of the 'first in, first out' is followed. None of this material is stored for longer than a week.

Waste piles will not be routinely turned as this method is not appropriate to the type of waste stored on site. Turning wastes may unsettle materials that are contaminated with oil or other contaminants which could provide a source of ignition leading to reactions with the waste material. Also, the required use of a shovel to move the waste piles may generate sparks and create sources of ignition. Frequent daily temperature monitoring of material piles will ensure any localised hotspots are detected.

6.2 Monitor and control temperature

6.2.1 Reduce the exposed metal content and proportion of fines

There is unlikely to be any waste containing fines accepted on to Site.

Materials accepted on Site go through treatment processes including machine separation, shearing and shredding and are distributed into designated stockpiles. Materials such as SMW, ASR, ELVs, light iron and non-ferrous are distributed to separate stockpiles. These stockpiles are individually risk assessed to determine what extent they pose a fire risk.

Fine material including SMW and ASR is produced once the material has been processed through the shredder and the metallic fractions and larger non-metallic fractions have been separated. SMW and ASR are placed in separate waste bays. SMW residue is covered prior to further processing in the SWAPP. The SMW residue bay is fitted with a sprinkler system and a deluge system connected to the internal ring main system.

At the end of the process the fine material is sent to S Norton's partners on Site 'Axion Polymers' for further processing. This material is stored for no longer than 72 hours prior to transfer.

Due to the nature of the operation and the recovery of metals on Site, there will be an proportion of fine particles of metal in some stockpiles. As a result, proactive mitigation measures are taken to monitor all combustible stockpiles daily through handheld monitor temperature checks. Daily check sheets have been created and these are recorded on the stockpile temperature checksheet (EF-4.4.6-01-33) included as appendix FPP-12

Strict waste acceptance checks are carried out to ensure that only permitted waste is allowed to be accepted on Site. Loads are visually inspected upon arrival. Any loads found to be contaminated will not be accepted and will be reloaded on to the delivery vehicle and returned.

Materials that pose a higher risk, such as metal turnings are isolated inside a bay with walls to the side and rear, stored at a minimum of 6 metres from any other wastes.

6.2.2 Monitoring temperature

On a daily basis, Site operatives inspect the storage areas for any anomalies, such as visual signs of heat, steam or vapour. Storage areas are also subject to daily inspection both in the morning and afternoon with handheld thermal monitors to detect any temperature increase. Temperature checks are recorded daily on the stockpile temperature checksheet, included as appendix FPP-12, and monitored for any signs of increase. Site management will be alerted to any increases in temperate over time and suitable actions will be carried out such as dousing the material or removal of the heated waste to the quarantine area away from combustible wastes or materials.

Out of hours, security perform site walkarounds each night and the night shift (5:30pm – 5:30am) is manned by a minimum of 6 staff and are vigilant to any signs of temperature increases in stockpiles including visual signs of heat, steam or vapour.

Suitable actions will be carried out such as dousing the material or removal of the heated waste to the designated quarantine areas on site where it would be subject to dousing using hoses connected to the internal ring main system. Both areas are large enough to leave 6m circumference around the zones. The quarantine areas will be marked with nearby signage and kept clear at all times.

6.2.3 Controlling temperature

The following actions will be taken to control temperature within waste storage areas:

- Waste storage times are minimised by following storage durations in Table 7-1 and using first-in-first-out basis principle for light iron, WEEE and ELVs;
- All waste streams are separated on Site to avoid reactions which may cause self-heating to occur and subsequently possible combustion;
- Light iron and SMW are processed daily. All other material is processed within 1 week of storage;
- Waste storage areas are sized according to the minimum required for operational efficiency;
- Daily stockpile heat checks and daily inspection of stockpiles using hand-held thermal imaging cameras, and trained operator observations are all used to identify hotspots; and
- The stockpile temperature check sheets included as appendix FPP-12 are used to identify and record trends over time to further target monitoring and treatment.

6.2.4 Dealing with hot weather and heating from sunlight

During periods of extreme hot weather (defined as temperatures higher than 25°C or more 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;
- The frequency of temperature inspection will be increased;
- The new shredder waste bays deluge system will be used to cool shredder infeed and outfeed stockpiles;
- Operatives will apply water through hoses to cool stockpiles; and
- Any reflective surfaces will be covered to prevent sunlight reflecting onto waste, where practicable.

6.3 Waste bale storage

There is storage of depolluted baled ELVs following the depollution process, in close proximity to pre-shredder. Baled ELVs are on Site for no longer than 2 weeks. Regular temperature checks (bi-daily) are carried out by way of handheld thermal monitors to test for hotspots within the bales.

7.0 Manage waste piles

7.1 Storing waste materials in their largest form

Waste is stored in its largest form before processing.

Materials are exposed to processes to facilitate size reduction, densification and to improve the metal content to a required quality for charging furnaces at a smelter. For example, any oversize material that has to be cut down is processed through the shear or a method using nipper pneumatic tools is carried out to cut smaller pieces. This includes gas cutting works to waste materials significant in size and the shearing of large items with a diameter of around 5 m.

Materials will be stored in their largest form for as long as possible prior to the processing of gas cutting and shearing and shredding.

7.2 Maximum pile sizes

Table 7-1 and Table 7-2 below provide information on the amounts of waste stored on Site and their locations.

Pile sizes on Site, namely light iron and SMW varies over the course of a few weeks as more material is stockpiled prior to outward collection and/or shipment.

The scrap metal material that is stored on Site is sold and shipped globally. As such a significant quantity of stock needs to be held to accommodate global market variations. The capacity to hold stock is key to the business model. This model is predicated around the need to sell stock when the global market conditions are favourable. If it were not possible to accumulate stock it may have to be sold below the market value. This would result in the operation not being able to compete in the global market.

As such, stockpile dimensions and volumes for light iron exceed those given in the EA FPP guidance. Other combustible wastes that may exceed FPP guidance in addition to the light iron are highlighted in red in the tables below, however, alternative measures are in place and described in section 7.3 to ensure the three objectives of the EAs FPP guidance continue to be met.

7.2.1 SWAPP Facility

The SWAPP facility keeps stockpiles to a minimum by ensuring wastes are processed as efficiently as possible and sending materials out by HGV 5 days per week. As illustrated by table 7-2 materials are typically stored for no longer than a week.

The oversized piles that contain combustible materials are highlighted red in Table 7-1 and Table 7-2 below. See alternative measures described in section 7.3.

Table 7-1
Bay Storage Areas: Waste Types and Dimensions

Waste Type	Location	How it is stored	Max Storage Time	Length (m)	Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
Zorba (clean non-ferrous non-combustible containing AL/Cu/ Brass)	Adjacent to the shredder building and in the southern part of the Site	In a bay with walls (loose) (outside)	1 month	20	14	7	280	1,960
Light iron	Adjacent to the Shredder in the middle part of the Site	Loose pile (outside)	1 week	31	42	10	1,302	13,020
Metal cuttings (pure stream)	Adjacent to the 5ft. Plate & Girder and Shear in the eastern part of the Site	In a bay with walls (loose) (outside)	1 week	11	14	4	154	616
Shear Plate and Girder (non-combustible)	Adjacent to the Shear and Shed in the middle part of the Site	Loose pile (outside)	1 month	23	7	8	161	1,200
Oversize Plate and Girder (non-combustible)	Adjacent to the Shear and in the middle part of the Site	Loose pile (outside)	1 month	17	12	6	204	1,224
5ft. Plate and Girder (non-combustible)	Adjacent to the cuttings and Shear in the eastern part of the Site	In a bay with walls (loose) (outside)	1 month	11	11	6	121	726
1m 80/20 HMS 1+2 (old steel) mixed materials	Eastern storage area	In a bay with walls (loose) (outside)	1 week	14	10	6	140	840

Waste Type	Location	How it is stored	Max Storage Time	Length (m)	Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
Fragmentiser (Shredder) Steel	Eastern bay at end of shredder downstream	Open bay with walls (loose) (outside)	4 hours	18	15	8	270	2,160
Zurik (non-ferrous residue non-combustible containing mainly stainless-steel material (96% pure) that gets handpicked)		Open bay with walls (loose) (outside)	1 month	20	10	8	250	2,000
Landfill (non-ferrous)	Adjacent to the non-ferrous processing plant in the northern part of the Site	In a bay with walls (loose) (outside)	1 week	14	10	5	140	700
Non-ferrous (process) waste	Adjacent to the non-ferrous processing plant in the northern part of the Site	In a bay with walls (loose) (outside)	1 week	10	8	5	80	400
SMW	Adjacent to the Shredder and Pre-Shredder in the southeast part of the Site	Loose pile (outside)	1 week	26	16	4	416	1,664
Batteries	Adjacent to depollution facility in the southeast part of the Site	Covered battery boxes (battery shed)	2 months	11	15	1	165	165
ELVs	Depollution building in the southeast part of the Site	Immediately stored at depollution building for depollution	1 week	n/a	n/a	2	n/a	n/a[4]

[4] See Section 8.2 in this FPP.

Waste Type	Location	How it is stored	Max Storage Time	Length (m)	Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
Baled ELVs	Adjacent to pre-shredder and shredder in the southeast part of the Site	Adjacent to pre-shredder and shredder in the southeast part of the Site	1 week	14	6	6	75	504
Cable (and wire)	In non-ferrous pile in the southern part of the Site	In a bay with walls (loose) (outside)	2 months	6	10	6	60	360
Tyres	Adjacent to non-ferrous storage in the southern part of the Site	In a bay with walls (loose) (outside)	1 week	10	7.5	6	75	450
Shredder Light Fraction (SLF residue)	Adjacent to the shredder in the middle part of the Site	In building (loose) (covered)	3 days	13	11	6	143	858
Shredder Heavy Fraction (SHF)	Adjacent to the shredder in the southeast part of the Site	In building (loose) (covered)	3 days	5	9	7	45	315
Fuel Storage (diesel oil)	Adjacent to the Site office at the Site entrance in the southwest area of the Site	A 45,000 litre double skinned tank with fill level integral bund capable of containing at least 110% of the volume of the largest container within the bund.	2 months	n/a	n/a	n/a	n/a	n/a
AdBlue	Adjacent to the Site office at the Site entrance in the southwest area of the Site	A 2,500 litre tanker contained in secondary concrete building, providing bunding capable of containing at least 110% of the volume of the containers within the bund.	2 months	n/a	n/a	n/a	n/a	n/a
Hydraulic oil (Equivis 46)			2 months	n/a	n/a	n/a	n/a	n/a

Waste Type	Location	How it is stored	Max Storage Time	Length (m)	Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
Rubia Works 4,000 oil	Adjacent to the Site office at the Site entrance in the southwest area of the Site	A 2,700 litre tanker contained in secondary concrete building, providing bunding capable of containing at least 110% of the volume of the containers within the bund.						
DynaTrans ACX 30 (KTR 430) oil								
DynaTrans ACX 50 (KTR 450) oil								
Waste oil								
Oily rags	Adjacent to SWAPP Control Room in delamination mill building	Containers surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.	2 months	n/a	n/a	n/a	n/a	n/a
Gas bottles and cylinders	Adjacent to the workshop and mobile plant storage in the western area of the Site	Oxygen and non-oxygen cylinders are stored on Site for use in hot cutting (burning) processes, apart in separate cages.	1 month	n/a	n/a	n/a	n/a	n/a
Gas cylinders (orphaned)?	Eastern boundary	Locked cage	1 month	n/a	n/a	n/a	n/a	n/a
General waste	Next to Site office	1,100L bins	1 week	n/a	n/a	n/a	n/a	n/a

Table 7-2
SWAPP Bay Storage Areas: Waste Types and Dimensions

Waste Type	Location	How it is stored	Max Storage Time	Length (m)	Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
SMW Residues (Typically less than 150mm)	Stored in Bay A adjacent to delamination mill.	Pre-processed. Loose pile. Outside Covered.	1 week	12	10	4	120	480
ASR (Shredder Light Fraction and Eddy Current Separator Waste containing aggregate, textiles, metals, plastic and rubber)	Stored in Bay B adjacent to SWAPP1.	Pre-processed. Loose pile. Outside Partly covered.	1 week	19	16	10	304	3,040
Oversize (material >125mm and mixed with ferrous, containing large plastic and wire bundles); potential for batteries	Stored in Oversize Bay.	Processed. Loose pile. Outside Covered.	2 hours	5.7	4.4	4	25	100
	Stored in 'L-shape' Bay.	Processed. Loose pile. Outside Uncovered.	1 week	14	10	5	140	700
SWAPP1 (non-ferrous)	Stored in non-ferrous Bay.	Processed. Loose pile. Outside Covered.	12 hours	3.3	4.6	4	15	61
HPS Wire (~90% PVC coated wire with some textiles)	Stored in Delamination Mill.	Loose pile. Inside.	24 hours	7.7	4.4	4	34	135
HPS Drops (~80% stainless and circuit boards with some heavy plastics	Stored in Delamination Mill.	Loose pile. Inside.	3 days	7.3	5.2	4	38	152

Waste Type	Location	How it is stored	Max Storage Time	Length (m)	Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
Solid Recovered Fuel (SRF); < 10% plastic containing textiles and combustible materials	SRF Bay	Processed. Loose pile. Inside.	3 days	15	20	10	300	3,000
Fines (material <5mm mostly inert containing 20% organics)	Bay 5	Processed. Loose pile. Outside Covered.	4 hours	5.9	4.4	6	26	156
	Bay 1A Middle of Yard	Loose pile. Outside partly Covered.	1 week	10.2	3.2	6	33	196
	Middle of Yard	Loose pile. Outside Uncovered.	3 days	20	8	5	160	800
Aggregate (traces of ferrous and non-ferrous)	Bay 3	Processed. Loose pile. Outside Covered.	24 hours	8	4.4	5	35.	176
MAP30 (mixed material 20-125mm in size containing plastic, rubber, aggregate and non-ferrous metal)	Bay 2	Processed – 100% purity. Loose pile. Outside partly Covered.	24 hours	10.2	3.2	5	33	163
	Bay 1B	Processed. Loose pile. Outside partly Covered.	3 days	10.2	3.2	5	33	163

Waste Type	Location	How it is stored	Max Storage Time	Length (m)	Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
MAP10 (mixed material 5-20mm in size containing ~60-70% plastic with some copper wire)	Bay 1B	Processed. Loose pile. Outside partly Covered.	3 days	10.2	3.2	5	33	163
	Bay 6	Processed. Loose pile. Outside partly Covered.	12 hours	7.5	5.6	8	42	336
	Bay 4	Processed. Loose pile. Outside partly Covered.	3 days	8.1	4.3	6	35	209
SDS Heavies (Mixture of 'heavy' materials 5-130mm in size: stainless, rubber, aggregate, large wood and plastic)	Bay 7	Processed. Loose pile. Outside Covered.	24 hours	8	6	8	48	384
	SRF bay	Processed. Loose pile. Inside.	3 days	6	4	8	24	192

7.3 Alternative measures in place to ensure pile sizes and volumes can meet EA FPP Guidance

Some wastes with combustible properties, highlighted in red, exceed the maximum waste pile sizes given in the EA FPP guidance. However, extensive alternative measures on site will account for the larger pile sizes and ensure that the Site can still meet the three objectives of the EAs FPP guidance as described below:

- Storage durations for wastes to be processed in the SWAPP and following processing will not exceed 1 week;
- An automated Fireshield fire detection and suppression system has been installed to cover the new shredder and downstream processing. The largest pile size (light iron) is covered and also the oversize SMW pile and Shredder Light Fraction (SLF residue) are covered. This will utilise automated smoke, heat and flame detection cameras. Suppression is provided by 2 remote cannon monitors covering each stockpile (Light iron and SWM). The monitors provide high flows of water with foam application units and oscillate around the source to dampen the whole area to prevent the fire from spreading. The primary pump set is able to deliver 6,000 lpm, A secondary pump set will then activate at a lower set point bringing the total deliverable volume to 9,000lpm during a significant fire. In addition, downstream processing areas are covered by flame detectors and deluge systems on all shredder output bays. In addition, the oversize fragmentiser (Shredder) Steel pile is covered by monitor canons strategically placed on top of the shear;
- The likelihood of self-heating and self-combustion will be minimised by storing wastes at the Site for minimal periods of time. The maximum storage time for waste piles that exceed waste pile sizes given in the EA FPP guidance is 1 week with the exception of tyres which is 2 weeks and Zorba (mixed non-ferrous) which is 1 month. The Zorba is considered non-combustible and any non-conforming wastes such as combustible items will be handpicked from the stockpile. The Site also carry out regular sampling on this material (at least once a week);
- Strict acceptance and control of waste procedures included as appendix FPP14 will ensure that only permitted wastes are accepted on Site. These measures will minimise the risk of self-heating and self-combustion, therefore the minimising the likelihood of a fire;
- The Site benefits from extensive security measures including single access lockable site entrance gate, out of hours external security who perform site patrols, a night shift (5:30pm - 5:30am) with typically 6 staff, an alarm system and an extensive CCTV system which can be accessed 24-hours a day by senior management via a mobile phone app and monitored and reviewed by security contractors. These extensive security measures will reduce the risk of arson and the likelihood of a fire starting and taking hold happening;
- Extensive, twice daily, monitoring of light iron and SMW piles using handheld thermal monitors. Out of operational hours the Site is manned by minimum of 6 staff who are vigilant to detect a heating event through flames or smoke. This will allow the early detection of a fire allowing it to be extinguished rapidly, within 4 hours, and minimise the spread within the Site and to neighbouring Sites;
- The Site benefits from an effective and reliable firefighting strategy with both an automatic and manual suppression system. Sources of water available onsite include 22 hydrants (all linked to mains water supply via tanks on site and on SWAPP (flow rate: 400 litres per minute over 3 hours) and borehole supply feeding into a large water tank (connected to the mains on site) with capacity to supply 30 cubic metres per hour (500 litres per minute over 3 hours). In addition, 10 inch/250mm Mains water point on Tenax Road is capable of delivering 850-1,000 litres per minute;

- An automatic fire detection and suppression system is in place for the storage bays inside the SWAPP facility including the SRF Bay. S Norton are also exploring the option to place a water deluge system above the storage bay for the Processed SRF Bay;
- Water supply/availability has been significantly improved with a new 400,000L water tank installed on site to increase overall water supply to 540,000L; and
- S Norton are considering installing automatic flame detection overlooking the ASR stockpile. The facility currently operates 24/7 allowing quick response times in the unlikely event of a fire.

It is therefore considered that the extensive fire fighting systems on Site, along with the additional alternative measures summarised above, will be sufficient to extinguish a fire in a waste pile which exceeds the EA FPP maximum pile size guidance within 4 hours. This will also minimise the spread of fire within the Site and to neighbouring sites.

8.0 Waste stored in containers

8.1 Waste stored in containers

8.1.1 Types of container

Waste types stored in containers are restricted to:

- Waste batteries – stored in dolav crates (1.2m x 1m x 0.74m); and
- General waste – stored in 1100 litre wheelie bins (1.38m x 1.33m x 1.09m).

8.1.2 Accessibility of Containers

All containers are easily accessible from more than one side so a fire could be quickly extinguished.

8.1.3 Moving Containers in a Fire

In the event of a fire, the Site's ability to move skips quickly would be utilised to reduce the risk of fire spread. Trained staff are able to either fight a fire in situ using portable fire extinguishers or move the container to the quarantine area using the appropriate mobile plant so the fire can be tackled using the relevant fire fighting medium.

8.2 Whole ELVs

Whole ELVs are stacked no more than 2m high (no more than 2 ELVs). S Norton do not carry out racking so the 3 vehicles high rule does not apply.

Each vehicle is accessible from at least one side to allow active firefighting and so unburnt vehicles can be accessed and moved to prevent the fire spreading.

9.0 Prevent Fire Spreading

9.1 Separation distances

Waste will be stored within designated storage areas as illustrated on Drawing 02.

No wastes will be stacked in excess of 10m high.

All combustible stockpiles will have a minimum 6m distance from other stockpiles and a minimum 6m separation to any building or fixed structure on site. The only exception is the temporary placing of fragmentiser feed adjacent to one side of the shredder in feed conveyor to enable ease of loading into the shredder.

Stockpiles will be located at least 6m from the perimeter, buildings and other combustible or flammable materials.

As explained under Section 7.2 Maximum pile sizes, waste volumes and durations will be guided by material supply fluctuations and vessels. It is likely that similar material will be merged into one larger pile prior to a vessel coming in, however, combustible wastes identified in FPP guidance and under section 2.1 will be stored with a minimum of 6m separation between piles and Site buildings/boundaries.

9.2 Fire walls construction standards

Fire walls are positioned in the SWAPP, as shown on drawing 02. The fire walls are made out of 12mm thick steel for the bottom 2.5mm with 8mm thick steel plate above. The melting point of steel plate is around 1,400°C.

Fire walls are not used on Site outside of the SWAPP facility.

9.2.1 Storing waste in bays

Fragmentiser feed will be placed adjacent to one side of the shredder in-feed conveyor to enable ease of loading into the shredder. Fragmentiser dirt and other production or wastes streams will accumulate at the base of output conveyors. These materials are held within storage bays. These waste piles will not be routinely turned as this method is not appropriate to the type of waste. Turning wastes may unsettle materials that are contaminated with oil or other contaminants which could provide a source of ignition leading to reactions with the waste material. Also, the required use of a shovel to move the waste piles may generate sparks and create sources of ignition.

Frequent daily temperature checks of material piles with handheld thermal monitors by day staff in the morning and afternoon will ensure any localised hotspots are detected. An overall temperature reading of each of the stockpiles in question is taken.

If S Norton detect any hotspots through visual observations, for example steaming or through a sudden increase in temperature following temperature checks staff will quickly remove wastes at risk of ignition to the quarantine area to isolate any bays with burning waste.

Flame height and radiation have been considered but it is not deemed practical or accurate to measure due to the mixed material that contain rubber and plastics, and particularly with the unprocessed material.

The turnings bay has a freeboard space at the top and sides to prevent fire spreading over and around the walls due to its high flammability properties. Other material is not deemed high risk and does not have the same freeboard space due to the risk of combustion being significantly lower.

10.0 Quarantine Area

10.1 Quarantine area location and size

The Site benefits from two quarantine areas which can be utilised for fire management and non-compliant waste; quarantine area A and quarantine area B.

Quarantine area A is located in the western area of the Site and quarantine area B is located in the eastern area of the Site. Both areas will be marked with the use of signage close to the quarantine areas. The areas are kept clear at all times.

All relevant staff have been trained accordingly should a fire occur within a stockpile.

The location of the quarantine areas is illustrated on Drawing 02 and detailed in Table 10-1 below.

Table 10-1
Quarantine Area Dimensions

Quarantine Area	Primary Use	Quarantine Area	Length (m)	Width (m)	Height (m)	Volume (m^3)[5]
Fire Prevention	Dousing of burning/smouldering waste and/or separation of unburnt waste	A	27	18	10	6017
		B	25	18	10	6013
		Total				**12,030**

10.1.1 Non-compliant Waste Quarantine Area

In the event of non-compliant waste being identified within the waste load, the vehicle will be requested to remove the load offsite immediately. If the vehicle has already unloaded the waste, it will be moved to the quarantine area A or area B and removed off site within 14 working days or earlier pending a suitable disposal route.

10.1.2 Fire Management Quarantine Area

The cumulative fire management quarantine area holds at least 50% of SMW material. The storage of light iron is greater but carries a much lower risk of waste flammability.

The placement of the quarantine areas is based on the following factors:

- It allows for the prompt and direct removal of smouldering, burning or fire damaged wastes from the waste storage and to allow access by the Fire Service;
- Proximity to flammable liquids – the quarantine area is situated at least 6m from any potentially flammable liquids on Site such as diesel tanks; and
- Dynamic areas on alternating sides of the Site that can be used depending on where the alight waste and potential fire fighting is taking place.

Due to the nature of operations covered in Section 7 including the storage of light iron and the fluctuations in material input and incoming vessels, and quantity of SMW, it is deemed not practical or economically viable to

[5] Volume calculations based on formula for triangular stockpile V=((Ab + aB + 2(ab + AB)) *h)/6

have an area that can hold at least 50% of the largest waste storage area on site. However, the designated and dynamic quarantine areas provide a 6m circumference that is kept clear at all times, as shown on drawing 02.

10.1.3 SWAPP Quarantine Area

In addition to the two quarantine areas, Area A and Area B, if required, the Axion Weighbridge/SWAPPP facility loading area could be used (area marked on Drawing 02 as Axion Weighbridge.

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

The Site Management will instruct all Site operatives when and how the burnt/burning waste, or any hot loads delivered accidently to Site, will be moved to the quarantine area. 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 quarantine area(s);
- The movement of the waste will be overseen at all times by the Site Management to minimise any spillages and ensure the area is not overfilled;
- To limit any spillages, plant will not be overfilled when moving the waste;
- The burning/smouldering waste will be doused using the relevant fire extinguisher, a fire hose located onsite connected to the mains, or a fire hose supplied by the FRS connected to the hydrant, mains water point or water pumped from the fire engine; and
- If appropriate burnt waste will be taken offsite to a suitably permitted facility within 48 hours.

All Site operatives will be trained to follow this FPP and all procedures listed in the above sections.

10.3 Procedure 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 fire

11.1 Detection systems in use

Staff are alert for signs of ignition including smoke and odour in waste storage and processing areas and are trained to be vigilant for any sign of fire or potential source of ignition. Every operator has a radio which can be used to alert Site Management to any fire or potential incident. This will allow the first signs of a fire to be detected early by Site operatives who will manually raise the alarm.

A site check is undertaken at the end of each day and a daily temperature check is performed of stockpiles by both in the morning and afternoon using handheld thermal monitors.

The Site is manned 24/7 with a night shift operating 5:30pm - 5:30am and by external security that patrols the Site out of hours. If on site staff or security personal identify a fire they will phone the on-call person in charge (PIC) e.g. Site Manager who will then implement the roll call to cascade through to bring relevant people on Site, as outlined in the Emergency Action Plan in appendix FPP-10.

In addition, the Site is 24hr monitored through an extensive network of CCTV cameras on Site covering all waste processing areas. The cameras are fitted so areas of the Site that are monitored include the Site entrance, Site office, weighbridge and waste storage bays. This will aid the visual detection of fires inside and outside of operational hours. CCTV footage can be monitored and accessed 24-hours a day by senior management via a

mobile phone app who will be able to raise the alarm by calling the emergency services and Site Manager/key holders to instigate a quick response.

The Site is fitted with an alarm system with manually activated call points. Site boundary checks are completed weekly to ensure site security is maintained and the risk of arson is reduced.

11.1.1 Fire detection in the SWAPP

Fire alarms are located in buildings and enclosures. Inside SWAPP2 control panel there is a system that detects smoke and can raise an alarm.

The SWAPP operates a weekly dedicated fire system check, as shown in Appendix FPP-16.

Onsite staff also conduct regular temperature checks on input wastes that have been highlighted as high risk including oversize bay. Stockpile temperatures are recorded using a heat sensitive camera and high values are recorded on log sheet to identify hot spots.

The major pieces of equipment are equipped with temperature sensors which are programmed to detect a sudden increase in temperature. A sudden increase in temperature will trigger an alarm and emergency stops to the plant.

12.0 Suppressing fires

12.1 Suppression systems in use

The new shredder downstream processing plant will benefit from a series of video flame detectors in each of the bays with deluge systems on each.

In an incident, S Norton would utilise all fixed position fire monitors within range of the fire if it occurs within a stockpile. If the remote monitors are not in range then hoses that are connected to the hydrants on site will be utilised. Theses hoses are able to deliver between 850-1,000 litres of water per minute for 3 hours. This has been confirmed by Greater Manchester Fire Brigade. The Fireshield system is able to deliver 6,000 l/pm on the primary pump set with a secondary pump set able to increase this to 9,000 l/pm. The system is fed from two large tanks of 140,000L and 400,00L, totalling 540,000 Litres.

Site staff are trained in the location and use of fire hoses and other fire fighting equipment. Fire drills are held weekly where fire fighting equipment is tested to ensure the equipment is in working order and staff are trained in deployment.

The locations of all fire extinguishers and fire hoses are identified on Drawing 05. All firefighting equipment is on the CMMS and is subject to weekly checks in accordance with the Fire Hose and Appliance Checksheet Liverpool (SF-4.4.6-04) which is included as appendix FPP-11.

12.1.1 Suppression in the SWAPP Facility

The SWAPP facility has automatic detection and deluge systems in place in bays for the SRF, the Bulk Reception Unit (BRU) and Oversize. If the automatic detection systems detect heat within the bay an automatic solenoid is triggered to release the deluge systems and an alarm is sounded on the plant and in the control room.

The automatic detection and deluge systems are tested regularly as part of the planned maintenance schedule. All tests are recorded for their reaction time and to check all nozzles are working.

The SWAPP facility also has manual deluge systems. All dust filters on SWAPP1 and SWAPP2 have water deluge systems present which can be operated externally by a handle. The ECS enclosure in SWAPP1 has a manual

deluge valve and Bay 6 (containing MAP10) has a manual sprinkler system. The SWAPP2 building contains a sprinkler system in the roof which can be triggered manually.

Inside the Metal Recovery Plant inside SWAPP, the dust filters have CO_2 deluges and there is also CO_2 deluge on the metal recovery plant discharge chute. There is a separate standalone shredder located in the metal recovery plant that is equipped with a manual deluge system.

All mobile plant is equipped with fire extinguishers. The 972 CAT's each have a fire deluge system that in the unlikely event of a fire under the hood will spray CO_2 in the engine compartment.

13.0 Firefighting techniques

13.1 Active firefighting

S Norton is currently in the process of instigating further structured bespoke training for staff, including firefighting, fire marshal and incident management courses. Simulated exercises that replicate mock fire scenario incidents on site will also be carried out on a regular basis.

13.1.1 Fire extinguishers and fire hoses

The closest fire station is Stretford Fire Station to the south of the Site. Using Google directions and mapping [6], the drive time is approximately 4 minutes and it is approximately 1.5 miles between the Site and the fire station.

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

- Where operators are trained in use, and if confident to tackle the fire;
- On very small fires, or to facilitate own escape if trapped by fire; and
- Sections 3.2.1 and 3.2.2 testing the plan and staff training.

13.1.2 Small Fire

A small fire or area of smouldering waste will be dealt with as follows:

- A fire or area of smouldering waste will not be dealt with in-situ, mobile plant will be utilised to pull the affected waste into the open and away from any further waste that could become a light on contact; and
- Depending on the size / nature of the fire the waste will either be:
    - Extinguished immediately[7] utilising the fire extinguishers, hoses or deluge system as appropriate; or
    - Moved to the appropriate quarantine area and extinguished[8].

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

[6] Google Maps, Accessed in April 2022
[7] 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.
[8] 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.

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

13.1.3 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 onsite;

- The Site Management and FRS will be contacted immediately. The EA will be notified at the first opportune moment.
- Following arrival of the FRS, all Site staff will take instructions from the FRS which may include any of the following:
    - If possible, waste that is unburnt will be dampened down to prevent the fire from spreading further;
    - If possible, unburned material will be separated from the fire using heavy plant;
    - 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 Supply

14.1 Available water supply

Sources of water available onsite are:

- The on-board water supply from FRS vehicles;
- 10 inch/250mm Mains water point on Tenax Road (flow rate: 850-1,000 litres per minute);
- 22 x Hydrants (all linked to mains water supply via tanks on site and on the Axion plant (flow rate: 24 cubic meters per hour (400 litres per minute over 3 hours)); and
- Borehole supply feeding into a large water tank (connected to the mains on site); capacity to supply 30 cubic metres per hour (500 litres per minute over 3 hours).
- 2 x mains-fed water storage tanks totalling 540,000 litre capacity (140,000 litres and 400,000 litres).

Water is supplied to the Site via mains water supply, no: 10065015, located under the pavement 160m from the Site on Tenax Road. The location of hydrants is shown on Drawing 02.

14.2 Alternative measures in place to ensure the availability of water meets EA FPP Guidance

The following alternative measures are in place to ensure the three objectives of the EA's FPP guidance continue to be met and there is adequate availability of water supply for the Site and stockpiles that exceed the EA FPP guidance:

- The Site benefits from an effective and reliable firefighting strategy with both an automatic and manual suppression system;

- Sources of water available onsite include 22 hydrants (all linked to mains water supply via tanks on site and on SWAPP (flow rate: 400 litres per minute over 3 hours) and borehole supply feeding into a large water tank (connected to the mains on site) with capacity to supply 30 cubic metres per hour (500 litres per minute over 3 hours). In addition, 10 inch/250mm Mains water point on Tenax Road is capable of delivering 850-1,000 litres per minute. Greater Manchester Fire Brigade have confirmed that they can access between 850-1,000 litres of water per minute for 3 hours in the event of a major fire on the Site;
- An automatic fire detection and suppression system is in place for the storage bays inside the SWAPP facility. S Norton are also exploring the option to place a water deluge system above the storage bay for the Processed SRF Bay;
- Storage of light iron and SMW adjacent to shredder; the new shredder waste bays deluge system will be used to cool shredder infeed and outfeed stockpiles in addition to mist spray;
- An automated Fireshield fire detection and suppression system has been installed to cover the new shredder and downstream processing, which utilises automated smoke, heat and flame detection cameras. Suppression is provided by 2 remote cannon monitors covering each stockpile (Light iron and SWM). The monitors provide high flows of water with foam application units and oscillate around the source to dampen the whole area to prevent the fire from spreading. The primary pump set is able to deliver 6,000 lpm, A secondary pump set will then activate at a lower set point bringing the total deliverable volume to 9,000lpm during a significant fire. In addition, downstream processing areas are covered by flame detectors and deluge systems on all output bays; and
- Water supply/availability has been significantly improved with a new 400,000L water tank installed on site to increase overall water supply to 540,000L.

14.2.1 Available water supply in the SWAPP

The SWAPP facility has its own backup tank containing 120,000 litres of water. The water tank is topped up by S Norton's main pump which takes the water from a bore hole. The main pump has 2 side pumps that can fill the water tank if the unlikely event of the main pump failing.

The water tank supplies water to all Axion's sprinklers and hydrant mains. The pressure in the hydrant main is maintained by S Norton's main pump. The sprinkler pressure is maintained by a separate pump. If the pressure in the hydrant mains or pressure in the sprinkler mains were to drop, Axion has a backup Diesel pump that operates if the pressure in the main hose line reduces below 1 bar for 15 seconds. The diesel pump is designed to re-pressurize the water line back to the designed 7 bar. The diesel pump can operate for 6 hours before it runs out of diesel.

15.0 Managing fire water

15.1 Containing the run-off from fire water

The Site has a sealed drainage system and benefits from impermeable paving as illustrated on Drawing 02. The Site benefits from a penstock valve that will be closed during a fire to prevent fire water from entering the interceptors or catch pits, therefore, containing firewater within the Site. The penstock valve is manually operated.

The site surface can be bunded and the perimeter is surrounded by a steel fence sunk into the ground around the majority of the perimeter to contain fire water within the Site and to prevent overflow and discharge to surface water drainage.

S Norton had a hydrological survey of the Site to determine the amount of water that can be held on the Site surface. The survey confirmed that the Site has a storage capacity of 2,000m3.

The drainage system will be checked periodically with different elements checked as part of routine checks, for example, drainage grids are subject to weekly checks, catchpit, interceptor and bunds monthly and penstock valve quarterly. A record of inspections and any remedial actions taken as a result of these inspections will be made in the CMMS.

15.1.1 Containing the run-off in SWAPP

SWAPP has its own catch pit and penstock valve that are isolated if a fire occurs. The fire water would be kept within the bunded area and can be pumped into tankers to be taken off site.

16.0 During and after an incident

16.1 Dealing with issues during a fire

The Site will not continue to accept waste if there is an active fire on Site. Waste will be diverted to the nearest S Norton site which is in Liverpool and, if possible, waste producers will be notified in advance to prevent delivery vehicles arriving on Site during and immediately after a fire.

If SWAPP couldn't operate and process material due to a fire or otherwise, material would be the responsibility of S Norton and would most likely go direct to landfill.

16.2 Notifying residents and businesses

An emergency contact sheet is included in Appendix FPP-16. In the event of a fire the following procedure will be followed:

- The Site Manager or individual nominated by the Site Manager will locate the emergency contact list included in Appendix FPP16;
- In the event of a large fire, 999 will be dialled first;
- The Site Manager or individual nominated by the Site Manager will phone each of the local businesses included in Appendix FPP16; 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 Event Log, 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 Working Plan 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 in the Event Log and will 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 another S Norton facility, most likely to S Norton's nearest Site in Liverpool.

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 Management to assess residues arising from the fire for processing. Material without a sufficient metallic fraction will be exported from Site as waste for disposal to a suitably permitted facility. Materials with an economic metal content will be processed to extract the metals.

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, any non-metallic burnt material will be transferred off Site to a suitably permitted disposal facility.

17.0 Conclusion

This FPP is considered to be a 'working' document that is reviewed and updated annually or as required should any of the following occur:

- A fire on Site;
- A change or review of legislation;
- A change to operations on Site; 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.

APPENDIX FFP-17

Emergency Contact List

Contact	Phone Number
John Hogg Technical Solution, Mellor Rd, M17 1JT	0161 872 5611
Buildbase, 4 Tenax Rd, M17 1JT	0161 873 5300
Electricbase, Unit 2 Cross Tenax, M17 1AZ	0161 873 5304
Chemtura Services House, 7 Bailey Rd, Stretford, M17 1SA	0161 872 2323
Tag Forklift Truck Service, Mellors Rd, M17	0161 848 0555
R&A Prestige Wrapping, 17 Mosley Rd, M17	0161 672 7376
Lloyd Worrall, 4 Tenax Rd, Stretford, Manchester M17 1JT	0161 886 2740
Kuehan & Nagel, 720 Trafford Park Rd, M17 1NH	0161 886 9700
Arco Ltd 72, Moorings Rd, M17	0161 869 5807
Big Truck Events, Mellor Rd, M17 1JT	07774890439
Unilever Foods, Trafford Park Rd, M17 1NH	0161 872 7531
Autohaus Manchester, Mosley Rd, M17 1HQ	0161 848 7072
The Technology Business Ltd, Unit 14-15/The Hives/Mosley Rd, M17 1HQ	0161 222 5848
Clifton Auto, The Hives, Mosley Road, M17 1HQ	0161 877 8338
XPO Logistics, 17 Mosley Rd, M17 1HQ	0161 876 5631
G & H Sheetfed Ltd, 1 Mosley Rd, Stretford, M17 1JS	0161 888 3600
Rye Motors, Trafford Park Road, M17 1HG	0161 877 6059
HI Auto Service, Unit 3, The Hives, Mosley Rd, M17 1HQ	0161 872 6160
Davis & Moore, Textile House, Trafford Park, M17 1NJ	0161 848 8008
Collier & Henry Concrete, Unit 2, Mellors Rd, M17 1PB	0161 872 8410
Industrial Door Systems Ltd, Unit 3, Tenax Road, M17 1JT	0161 876 0063

DRAWING 01

Site Location Plan

N

Legend:

ENVIRONMENTAL PERMIT BOUNDARY

TRAFFORD PARK

Little Bolton

Weaste

Scale 1:10,000

0 200 400 600 800 1000m

Rev	Amendments	Date	By	Chk	Auth

SLR

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Client
S NORTON & CO LIMITED

Project
TRAFFORD PARK METAL RECYCLING FACILITY
ENVIRONMENTAL PERMIT VARIATION

Figure Title
SITE LOCATION PLAN

Scale	SLR Project No.
1:10,000 @ A3	416.064371.00002

Designed	Drawn	Checked	Authorised
MS	TKS	MS	
Date	Date	Date	Date
JULY 2023	JULY 2023	JULY 2023	

Figure Number
001

Rev.
0

03/08/2023

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DRAWING 02

Site layout and drainage

Legend:

- ENVIRONMENTAL PERMIT BOUNDARY
- IMPERMEABLE SURFACE AND SEALED DRAINAGE
- MOBILE PLANT STORAGE
- QUARANTINE AREA

STORAGE AREAS

- SHREDDED HEAVY FRACTION (COVERED BAY)
- SHREDDED LIGHT FRACTION (COVERED BAY)
- SHEARING MATERIAL
- 5FT PLATE AND GIRDER
- CUTTINGS
- OVER SIZED 1+2
- LIGHT IRON
- SMW
- TYRES
- NON-FERROUS
- BATTERIES
- ASR
- SMW RESIDUE (COVERED)
- LANDFILL
- PROCESS WASTE

EMISSION POINTS

- A1 METAL SHREDDER EXHAUST
- A2 SWAPP EXHAUST
- A3 SWAPP EXHAUST
- A4 VENTS FROM FUEL STORAGE BUND
- A5 VENTS FROM ELV FUEL STORAGE BUND
- W1 DISCHARGE TO SEWER AND SAMPLING POINT
- W2 DISCHARGE TO SEWER AND SAMPLING POINT
- W3 DISCHARGE TO SEWER AND SAMPLING POINT
- SORTING SYSTEM OUTPUT 1
- SORTING SYSTEM OUTPUT 2
- FUEL / WHITE DIESEL / ADBLUE / OILS
- SWAPP OUTPUT BAY

Rev	Amendments	Date	By	Chk	Auth

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Client: S NORTON & CO LIMITED

Project: TRAFFORD PARK METAL RECYCLING FACILITY ENVIRONMENTAL PERMIT VARIATION

Figure Title: SITE LAYOUT PLAN

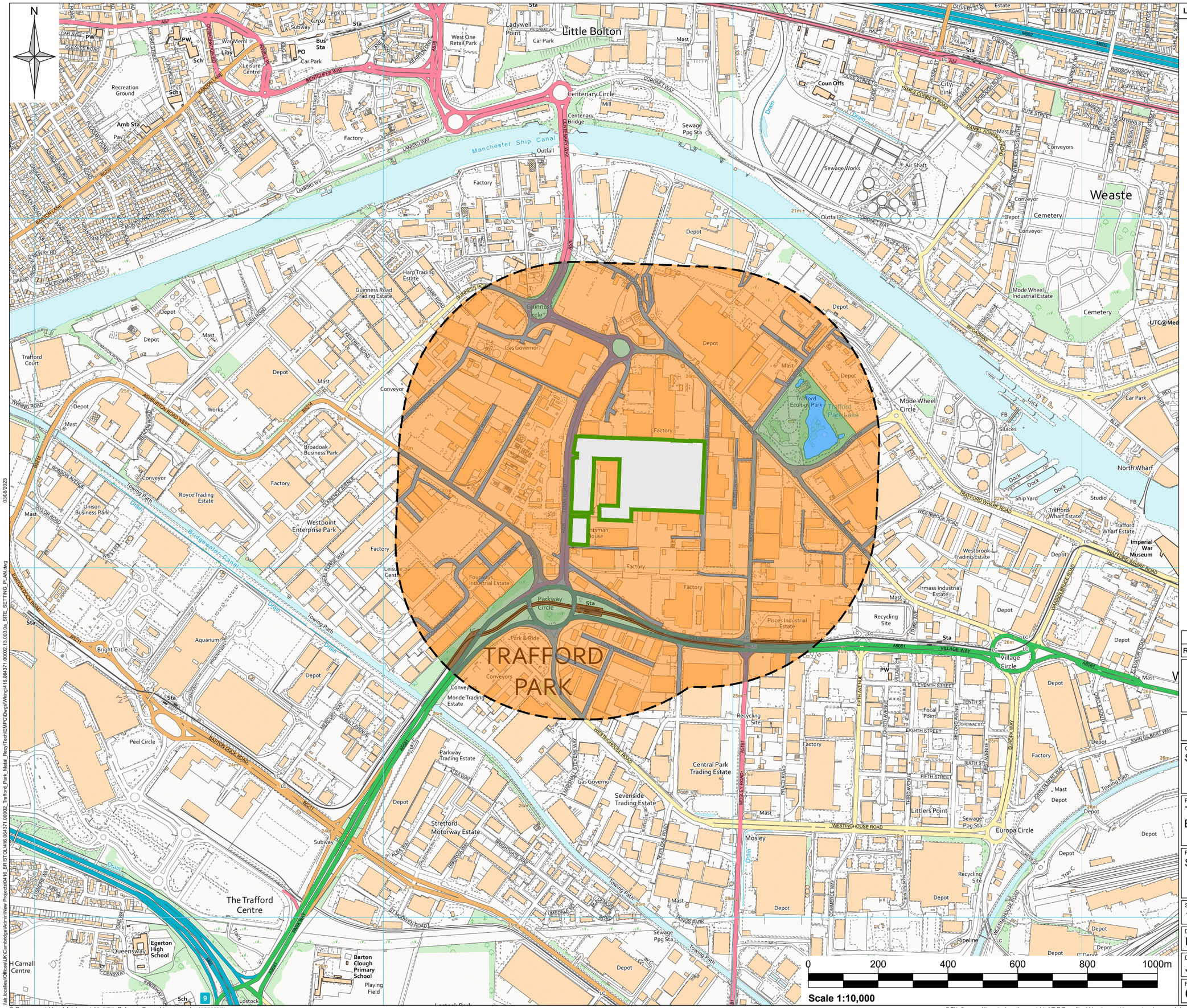
Scale	SLR Project No.
1:1000 @ A2	416.064371.00002

Designed	Drawn	Checked	Authorised
MS	TKS	MS	
Date	Date	Date	Date
AUG 2023	AUG 2023	AUG 2023	

Figure Number: **002** Rev.: **0**

DRAWING 03

Environmental site setting and receptors



Legend:

- ENVIRONMENTAL PERMIT BOUNDARY
- 500m BOUNDARY OFFSET
- LOCAL ROAD NETWORK
- TRAMLINE
- COMMERCIAL / INDUSTRIAL
- OPEN WATER / DITCHES
- OPEN GROUND

Rev	Amendments	Date	By	Chk	Auth

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Client
S NORTON & CO LIMITED

Project
TRAFFORD PARK METAL RECYCLING FACILITY
ENVIRONMENTAL PERMIT VARIATION

Figure Title
SITE SETTING PLAN

Scale		SLR Project No.
1:10,000	@ A3	416.064371.00002

Designed	Drawn	Checked	Authorised
MS	TKS	MS	

Date	Date	Date	Date
JULY 2023	JULY 2023	JULY 2023	

Figure Number
003

Rev.
0

03/08/2023

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DRAWING 04

Cultural & Natural Heritage Receptors

N

Legend:

- ENVIRONMENTAL PERMIT BOUNDARY
- 500m BOUNDARY OFFSET
- 2km BOUNDARY OFFSET
- LISTED BUILDING
- SCHEDULED MONUMENT
- LOCAL NATURE RESERVE
- REGISTERED PARKS AND GARDENS

0 200 400 600 800 1000 1200 1400 1600 1800 2000m

Scale 1:20,000

Rev	Amendments	Date	By	Chk	Auth

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Client: S NORTON & CO LIMITED

Project: TRAFFORD PARK METAL RECYCLING FACILITY ENVIRONMENTAL PERMIT VARIATION

Figure Title: CULTURAL AND NATURAL HERITAGE

Scale	SLR Project No.
1:20,000 @ A3	416.064371.00002

Designed	Drawn	Checked	Authorised
MS	TKS	MS	
Date: JULY 2023	Date: JULY 2023	Date: JULY 2023	Date

Figure Number: **004** Rev.: **0**

03/08/2023

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DRAWING 05

Fire Prevention & Management

EMISSION POINTS

W1	VALVED OUTLET TO SEWER
W2	VALVED OUTLET TO SEWER
W3	VALVED OUTLET TO SEWER

Legend:

- ENVIRONMENTAL PERMIT BOUNDARY
- IMPERMEABLE SURFACE AND SEALED DRAINAGE
- MOBILE PLANT STORAGE
- QUARANTINE AREA

STORAGE AREAS
- SWAPP OUTPUT BAY
- MAIN SITE

FIRE PREVENTION
- HYDRANT
- SPILL KIT
- REEL
- MONITOR
- FIRE EXTINGUISHER
- DELUGE SYSTEM
- TRAFFIC ROUTE / EMERGENCY SERVICE ROUTE

SITE DRAINAGE
- SURFACE WATER DRAIN
- HYDRANT PIPE
- DRAINAGE

Rev	Amendments	Date	By	Chk	Auth

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Client: S NORTON & CO LIMITED

Project: TRAFFORD PARK METAL RECYCLING FACILITY ENVIRONMENTAL PERMIT VARIATION

Figure Title: FIRE PREVENTION PLAN

Scale		SLR Project No.
1:1000	@ A2	416.064371.00002

Designed	Drawn	Checked	Authorised
MS	TKS	MS	
Date: AUG 2023	Date: AUG 2023	Date: AUG 2023	Date

Figure Number: **005** Rev. **0**

04/08/2023

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