



**APPLICATION FOR AN ENVIRONMENTAL PERMIT  
UNDER THE ENVIRONMENTAL PERMITTING  
(ENGLAND AND WALES) REGULATIONS 2016 (AS  
AMENDED)**

**FIRE PREVENTION PLAN**



**KAS METAL TRADING LIMITED,  
UNIT J PRESTWICH INDUSTRIAL ESTATE,  
COAL PIT LANE, ATHERTON,  
MANCHESTER, M46 0RY**

**ECL Ref: KMTL.01.02/FPP  
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## ACRONYMS/TERMS USED IN THE TEXT

BGS	British Geological Survey
CCTV	Closed Circuit Television
EA	Environment Agency
ECL	Environmental Compliance Limited
EMS	Environmental Management System
FLT	Fork Lift Truck
FPP	Fire Prevention Plan
FRA	Fire Risk Assessment
FRS	Fire and Rescue Service
KMTL	Kas Metal Trading Limited
LNR	Local Nature Reserves
LOW	List of Wastes
MAGIC	Multi Agency Geographical Information for the Countryside
NGR	National Grid Reference
NNR	National Nature Reserves
PAT	Portable Appliance Testing
POPs Regulations	Persistent Organic Pollutants (Various Amendments) Regulations 2019
POPs	Persistent Organic Pollutants
PPE	Personal Protective Equipment
RAMSAR	Convention on Wetlands of International Importance
SAC	Special Areas of Conservation
SPA	Special Protection Areas
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
TCM	Technically Competent Manager
The Facility	Kas Metal Trading Limited Operations undertaken at Unit J, Prestwich Industrial Estate

## 1. INTRODUCTION

### 1.1. Overview of the Fire Prevention Plan

- 1.1.1. A Fire Prevention Plan (“FPP”) has been prepared on behalf of Kas Metal Trading Limited (“Kas Metal”) by Environmental Compliance Limited (“ECL”) to accompany an Environmental Permit application for Unit J, Prestwich Industrial Estate, Coal Pit Lane, Manchester, M46 0RY, hereafter referred to as “the Facility”.
- 1.1.2. As per the requirements of the Environment Agency (“EA”) online guidance – ‘*Fire prevention plans: environmental permits*’<sup>1</sup> a FPP should be prepared, implemented and maintained at the Facility as the guidance applies to operators who store any amount of combustible waste.
- 1.1.3. Kas Metal is proposing to operate under a Bespoke Environmental Permit The Facility will accept up to 50,000 tonnes per year which will include a mix of ferrous and non-ferrous metals, construction/demolition metal waste components, WEEE and lead acid batteries. Consequently, Kas Metal will be proposing to accept combustible waste as defined by the EA.
- 1.1.4. This report follows the EA’s FPP guidance<sup>1</sup> and the fire prevention measures have been designed to meet the three objectives:
- minimise the likelihood of a fire happening;
  - aim for a fire to be extinguished within 4 hours; and
  - minimise the spread of fire within the site and to neighbouring sites.
- 1.1.5. The FPP identifies measures to be employed to reduce the likelihood of fires at the Facility. In addition, the plan identifies measures to be employed in the event of a fire in order to limit the damaged caused to the environment or human health.
- 1.1.6. Under current fire safety legislation<sup>2</sup>, a responsible person must carry out, or appoint a competent person to carry out, a suitable and sufficient assessment of the risks of fire to employees and others who may be affected. A Fire Risk Assessment (“FRA”) will be carried out by appointed specialist fire consultants prior to commencement of activities permitted under the Environmental Permit, as well as on an annual basis, or in the event of a change to operations at the Facility.
- 1.1.7. Environmental Permit application drawings have been prepared as part of this Fire Prevention Plan and are included in Appendix I of this FPP.

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<sup>1</sup> EA Online Guidance – ‘*Fire prevention plans: environmental permits*’. Available at: <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>, accessed October 2023.

<sup>2</sup> Regulatory Reform (Fire Safety) Order 2005

1.1.8. The drawings prepared are as follows:

- Site Location Plan – KMTL.01.01-01;
- Site Layout Plan – KMTL.01.01-02;
- Sensitive Receptor Plan – KMTL.01.01-03;
- Fire Prevention and Mitigation Plan – KMTL.01.01-04.

## 1.2. The Applicant

1.2.1. Kas Metal Trading Limited was incorporated on 4<sup>th</sup> January 2023 under company registration number 6464009.

## 1.3. Fire Prevention Plan Communication and Training

1.3.1. The following persons must read and understand the Fire Prevention Plan:

- all site staff including nominated Fire Wardens; and
- all contractors.

1.3.2. A copy of the FPP will also be shared with the Greater Manchester Fire and Rescue Service (“FRS”). A laminated copy of the Fire Prevention and Mitigation Plan (KMTL.01.01-04) will be located at the site entrance so that it is available out of hours.

1.3.3. A copy of the FPP will be kept within the site office at the Facility, as well as being electronically saved on the company server which all Kas Metal employees can access.

1.3.4. Training will be provided to all site personnel in relation to how to prevent fires on site, how to identify fire risks and how to identify fires on site. Staff members will undertake a fire awareness course and refresher training will be provided at regular intervals.

1.3.5. The Site Manager will ensure there is always a sufficient number of staff on site when the site is operational (minimum of eight) in order to ensure the FPP is followed.

1.3.6. All staff and contractors on site will be made aware and understand the contents of the Fire Prevention Plan and the procedures that are in place in the event of a fire on site. This familiarisation training will be undertaken as part of the company’s induction process and staff will be required to complete a multiple-choice quiz at the end of training sessions to evaluate the effectiveness of the training. Additionally, spot checks will be carried out once a month by the Technically Competent Manager (“TCM”) and noted in the site diary. All training records will be maintained on site.

1.3.7. New starters will be given basic fire instruction within the first three days of commencing employment, which will include:

- appropriate procedure if a fire is discovered;
- appropriate procedure if the fire alarm sounds; and
- roll call procedures.

- 1.3.8. New starters and seasonal hires will be included in the general employee training programme (including FPP training) at the earliest opportunity, as a maximum within 12 months.
- 1.3.9. A fire drill will be held annually to simulate the processes which would be undertaken in the event of a fire or other similar emergency, this will include deployment of appropriate firewater containment measures. Findings from the drill will be discussed and an action plan to address any opportunities for improvement will be implemented if necessary.

## 2. THE SITE

### 2.1. Site Location

- 2.1.1. The Facility is centred on National Grid Reference SD 66747 03495. The location of the Facility with the Environmental Permit boundary shown in green is provided on the Site Location Plan (KMTL.01.01-01) which is contained in Appendix I of this document.
- 2.1.2. The Facility is surrounded immediately to the east by woodland and residential land use, and a mix of commercial and residential land use in the north, south and west. The A577 is located approximately 175m to the south of the Facility boundary. The surrounding land uses are described in Section 2.2. of this FPP.
- 2.1.3. Access to the site via Coal Pit Lane can be obtained via Bag Lane approximately 130m to the north of the site boundary. This access point, in addition to the wider road network, is illustrated on the Site Location Plan (KMTL.01.01-01), which is contained within Appendix I.
- 2.1.4. The closest Fire Station is Atherton Community Fire Station, Gloucester St, Atherton, Manchester M46 0JT, and is located approximately 0.97km west of the Facility at its nearest point.
- 2.1.5. The Facility benefits from a number of security measures including lockable access doors. Only a limited number of employees possess a key in order to restrict unauthorised access into the Facility. A specialist security company, namely Marlowe Fire and Security, monitor the Facility remotely 24 hours a day, 7 days a week who will alert senior management of any unusual activity including if any intruders are detected. The Facility benefits from 16 Closed Circuit Television ("CCTV") cameras which are strategically positioned through the Facility.

### 2.2. Sensitive Receptors

- 2.2.1. A summary of the immediate environmental site setting is provided in Table 1.

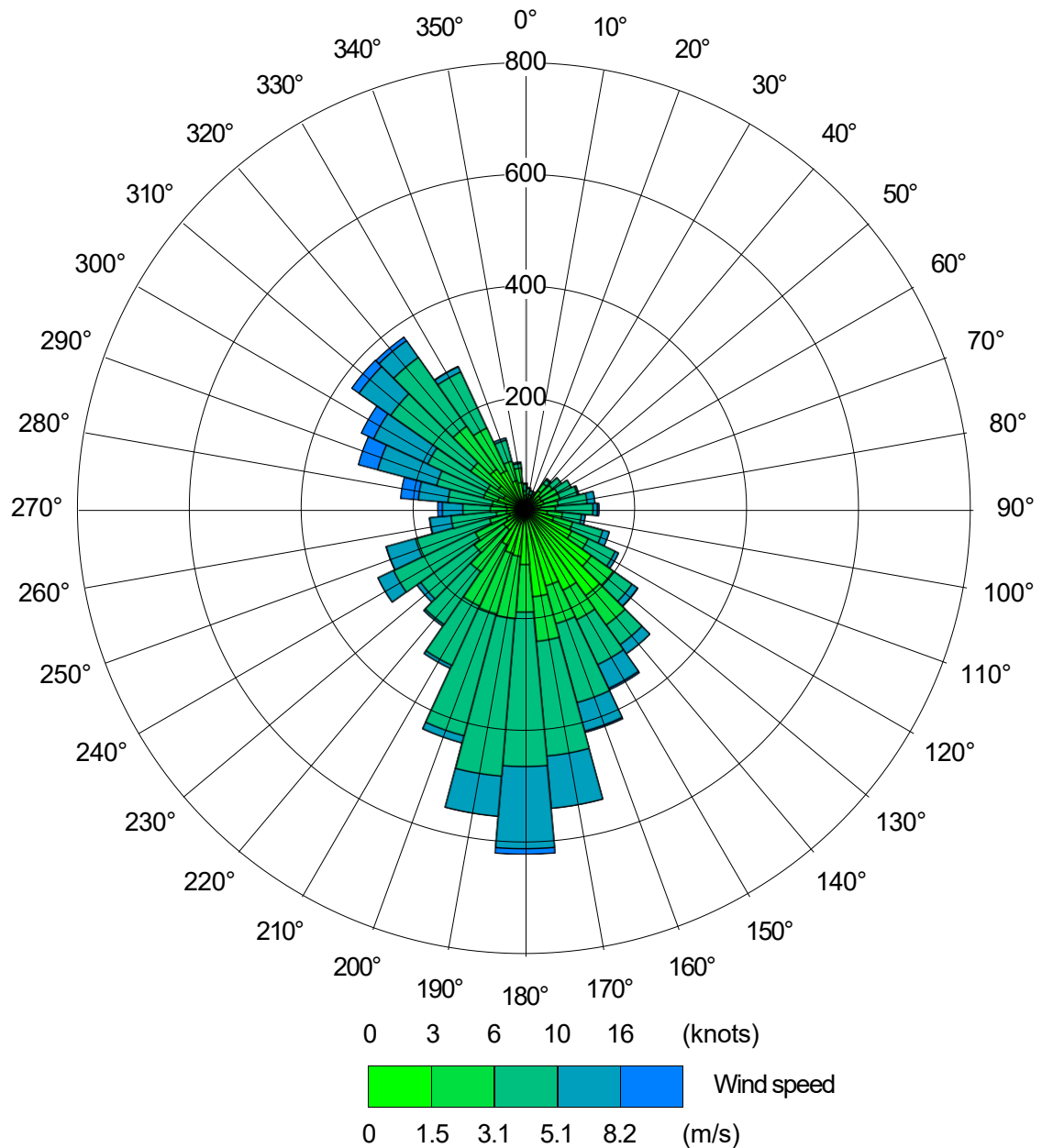
**Table 1 Summary of Surrounding Land Uses**

Direction	Description
North	Commercial/industrial units and residential properties.
East	Woodland, residential properties, General Practitioner ("GP") Surgery, Church and green space.
South	Commercial/industrial units, residential properties, petrol station, cemetery.
West	Industrial/commercial units, residential property, woodland and fields.

- 2.2.2. The potential sensitive receptors within a 1km radius of the EP boundary that could be affected by a fire at the Facility are shown on the Sensitive Receptors Plan (KMTL.01.01-03) which is contained in Appendix I of this document.

- 2.2.3. A wind rose showing the meteorological conditions for the Facility is provided in Figure 1. The information is based on annual historical data from Rostherne No.2 weather station (being the closest meteorological station to the Facility). The meteorological conditions demonstrate southerly prevailing wind direction.

**Figure 1: Wind Rose of the Local Meteorological Conditions**



## 2.3. Geology

- 2.3.1. The National Soils Institute – Soilscales website<sup>3</sup> describes the regional soils as *Slowly permeable seasonally wet acid loamy and clayey soils*.
- 2.3.2. According to the British Geological Survey (“BGS”) ‘Geology Viewer’<sup>4</sup> the bedrock geology is described as *Pennine Lower Coal Measures Formation – Mudstone. Sedimentary bedrock formed between 319 and 318 million years ago during the Carboniferous period*.

## 2.4. Hydrogeology and Surface Water

- 2.4.1. The Multi-Agency Geographical Information for the Countryside (“MAGIC”) online mapping tool<sup>5</sup> indicates that the Facility does not fall within a Source Protection Zone (“SPZ”).
- 2.4.2. According to the MAGIC Groundwater Vulnerability Zone Map, the Facility is located within an area of medium-low groundwater vulnerability.
- 2.4.3. Colliers Brook is the nearest watercourse which is located approximately 10m east of the Facility. Colliers Brook flows into a small waterbody approximately 440m east of the Facility.

## 2.5. Flooding

- 2.5.1. According to the EA’s long term flood risk maps<sup>6</sup>, the majority of the Facility area falls within an area possessing a very low risk of flooding from rivers and the sea. An area at very low risk of flooding is defined by the EA as having less than 0.1% chance of flooding annually. The eastern area of the Facility possesses low risk which is defined as having between 0.1% and 1% annual probability of flooding.
- 2.5.2. The majority of the Facility including the building is defined as being at very low risk of flooding from surface water (<0.1%).

## 2.6. Ecology

- 2.6.1. Searches conducted on the MAGIC website indicate that the Facility does not lie within 500m of any European or nationally designated sites. Therefore, no Ramsar Convention on Wetlands of International Importance (“Ramsar”) sites, Special Protection Areas (“SPA”), Special Areas of Conservation (“SAC”) or Sites of Special Scientific Interest (“SSSI”) were identified.

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<sup>3</sup> Cranfield Soil and Agrifood Institute Soilscales Map, available at <https://www.landis.org.uk/soilscales/#>, accessed October 2023

<sup>4</sup> BGS Geology Viewer, available at: <https://geologyviewer.bgs.ac.uk/>, assessed October 2023.

<sup>5</sup> MAGIC Map Online Mapping Tool, available at: <https://magic.defra.gov.uk/MagicMap.aspx>, accessed October 2023

<sup>6</sup> <https://www.gov.uk/check-long-term-flood-risk>, accessed October 2023

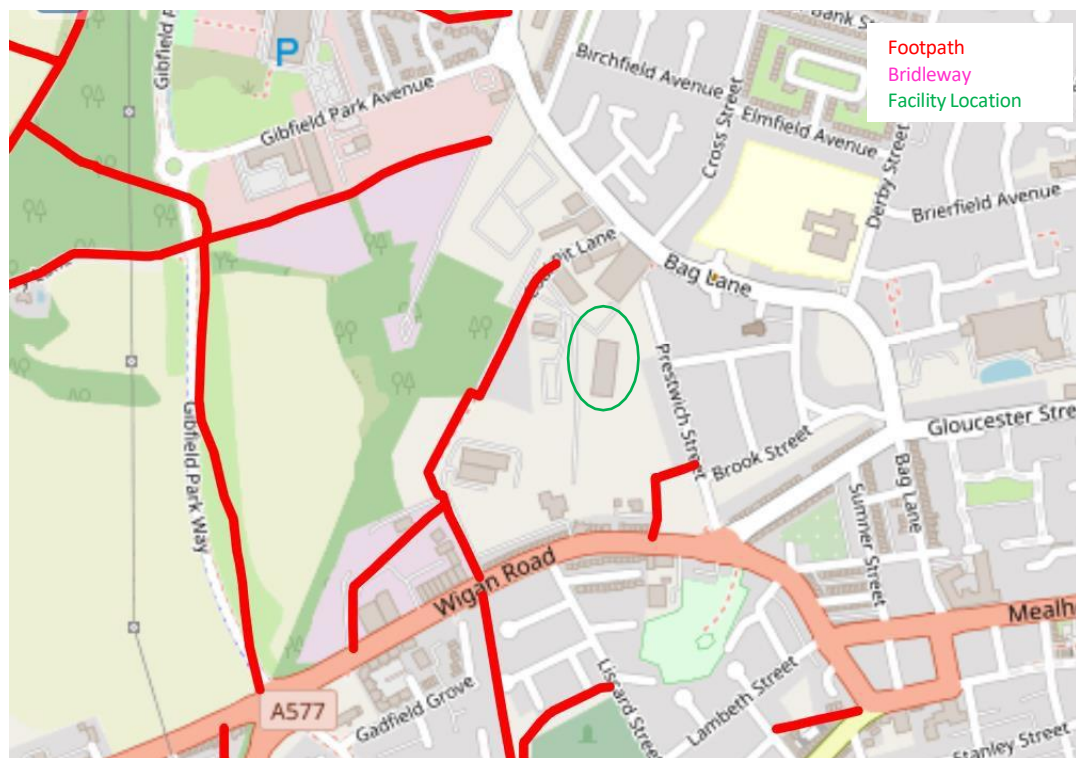
- 2.6.2. Furthermore, no National Nature Reserves (“NNR”) or Local Nature Reserves (“LNR”) are located within 1km of the proposed EP boundary.
- 2.6.3. Additionally, none of the following ecological receptors have been identified within 500m of the proposed EP boundary:
- World Heritage Sites;
  - Areas of Outstanding Natural Beauty;
  - Scheduled Monuments; and
  - Ancient Woodland.

### 3. SITE ACTIVITIES

#### 3.1. Overview

- 3.1.1. The Facility will accept less than 50,000 tonnes of waste per annum. The List of proposed waste codes is attached
- 3.1.2. The locations of operational and storage areas are shown on Site Layout Plan (KMTL.01.01—02) contained within Appendix I of this FPP.
- 3.1.3. The Facility's operating hours are Monday – Wednesday 08.00-16.30 and Thursday-Friday 08.00-17.30. The Facility will be closed on weekends and bank holidays.
- 3.1.4. The Facility is manned by a minimum of eight employees during operating hours. All visitors are required to report to the site office and sign the visitor's register upon arrival and departure. The visitor register is located in the site office.
- 3.1.5. No public rights of way cross the Facility site as shown in Figure 2<sup>7</sup>.

**Figure 2: Public Rights of Way**



<sup>7</sup> Rowmaps Public Rights of Way Map, available at: <https://www.rowmaps.com/>, accessed June 2023

### 3.2. Description of Site Activities

- 3.2.1. Site activities will be undertaken in accordance with the Operating Techniques, EMS and Environmental Risk Assessment.
- 3.2.2. Treatment will be limited to manual sorting, separation, grading, shearing, cutting using hand-held equipment only, of ferrous metals or allows and non-ferrous metals into different components for recovery.
- 3.2.3. No treatment of lead acid batteries, other than sorting and separating of the waste will be undertaken. Lead acid batteries are stored in an external closed container with electrical connectors pointing upwards. The container is impermeable with an acid resistant base and lidded to prevent ingress of water.

### 3.3. Types of Materials

- 3.3.1. The waste types and quantities stored at any one time at the Facility are provided in Table 2 and 3 below.

**Table 2: Waste Stored in Bays**

Storage Area/Container	Waste Material	Maximum Waste Pile (m <sup>3</sup> ) (L x W x H in metres)	Maximum Storage Duration (Weeks)
<b>Internal Bays</b>			
A	Motors	64 6 x 6 x 2.4	1
B	New Copper Tube	86 6 x 6 x 2.4	2
C	Brass	86 6 x 6 x 2.4	1
D	Aluminum Turnings	86 6 x 6 x 2.4	4
E	Aluminum Cuttings	43 6 x 6 x 2.4	3
F*	Low Grade Cable*	86 6 x 6 x 2.4	1
G*	Household Cables*	86 6 x 6 x 2.4	1
H	HE9 - Aluminum	86 6 x 6 x 2.4	2
I	Old Rolled Aluminum	86 6 x 6 x 2.4	3
J	Mixed Copper	86 6 x 6 x 2.4	1
K	Dried Copper Wire	17 6 x 4.5 x 2.4	2
L	Lead	21 3 x 3 x 2.4	1
M	Stainless Solids	43 3 x 3 x 2.4	3
N	S & A's	17 3 x 3 x 2.4	4
O	GM Solids	17 3 x 3 x 2.4	4

**Table 3: Waste Stored in Containers**

Container	Waste Material	Maximum Waste Pile (m <sup>3</sup> ) (L x W x H in metres)	Maximum Storage Duration (Weeks)
<b>Skips/Container</b>			
1	Copper Wire	36 6 x 2.4 x 2.5	3
2	Copper Radiators	36 6 x 2.4 x 2.5	4
3	Copper Elements	55 6.2 x 2.8 x 3.3	6
4	Copper Tube	55 6.2 x 2.8 x 3.3	6
5	Copper and Brass Radiators	55 6.2 x 2.8 x 3.3	6
6	Cast Aluminium	55 6.2 x 2.8 x 3.3	8
7	Low Grade Mixed Copper	55 6.2 x 2.8 x 3.3	4
8	High Grade Stainless Steel	36 6 x 2.4 x 2.5	6
9	Aluminium Cable	36 6 x 2.4 x 2.5	6
10	Zinc Sheet	36 6 x 2.4 x 2.5	8
11	Lead Acid Batteries	55 6.2 x 2.8 x 3.3	6
12	High Grade Cables	55 6.2 x 2.8 x 3.3	5

### 3.4. Persistent Organic Pollutants

- 3.4.1. Waste with the potential to contain Persistent Organic Pollutants (“POPs”) will be limited to scrap cables. The storage bays which may contain POPs are highlighted on the Permit drawings contained in Appendix I.

### 3.5. Other Combustible Materials

- 3.5.1. Other combustible materials which are stored at the Facility which are not waste include the following:
- integrally bundled 2,500 litre steel diesel tank; and
  - 5 x 5 litre petrol canisters (for fuelling petrol saw).

### 3.6. Waste Accessibility

- 3.6.1. The accessibility of each waste type in a fire fighting situation is shown on the Site Layout Plan (Drawing Reference KMTL.01.01-02) contained in Appendix I of this document.
- 3.6.2. The configuration of the site has been designed to enable easy access for fire engines and firewater application during active firefighting to ensure a fire is extinguished within 4 hours.

- 3.6.3. Waste skips have been located to enable them to be easily relocated to an appropriate area within the permitted area which will be dependent on the location of the fire at the Facility. Skips will be moved as soon as reasonably practicable to prevent the fire from spreading using site mobile plant.

### **3.7. Waste Storage and Quarantine Area**

- 3.7.1. Waste will be transported to the Facility and stored in the appropriately designated areas. The locations of waste are shown on the Site Layout Plan and Fire Prevention and Mitigation Plans (Drawing Reference KMTL.01.02-02 and KMTL.01.02-04) which has been drawn to scale.
- 3.7.2. Due to building size constraints, separation distances of 6m between the waste piles are not possible operationally. In order to address this, alternative measures are proposed. The Facility will store waste in significantly smaller maximum waste piles than permitted in the Fire Prevention Plan guidance (maximum waste pile size of 86m<sup>3</sup> compared to 750m<sup>3</sup> permitted in the guidance). Firewalls are also in place between the waste pile bays as illustrated on the drawing KMTL.01.02-04 contained in Appendix I of this FPP.
- 3.7.3. The proposed firewalls will resist fire (both radiative heat and flaming) and will have a fire resistance period of at least 120 minutes to allow waste to be isolated and enable the fire to be extinguished within four hours. A freeboard of 1m is also achieved to prevent spreading of fire between the bays.
- 3.7.4. The firewalls are of concrete block construction (non-combustible material) which are of 150mm thickness and maintain integrity during a fire event. Joint components and sealants possess the same fire resisting qualities as the fire walls themselves.
- 3.7.5. The waste container/skips benefit from the 6m separation distance between the open waste piles.
- 3.7.6. The Fire Prevention Plan Quarantine Area will be used in the event of a fire on site and will be kept clear at all times. The proposed location is shown on the Fire Prevention Plan (Drawing Reference KMTL.01.02-04) and can be used to move unburnt wastes to isolate them and prevent them from catching fire.
- 3.7.7. The Fire Prevention Plan Quarantine Area has a storage capacity of 43m<sup>3</sup> to hold 50% of the volume of the largest waste storage area (86m<sup>3</sup>/2 = 43m<sup>3</sup>) and benefits from a separation distance of 6 metres around the quarantined waste.

## 4. POTENTIAL SOURCES OF FIRE RISK

### 4.1. Common Causes of Fire

4.1.1. As per the EA's FPP online guidance, the following potential sources of fire risk have been identified, based on the hypothetical scenario of the absence of any risk management measures and strategies being employed:

- **Arson:** Industrial Estates and factories can commonly be affected by arson, which is a serious issue as the ensuing fire can easily spread to another unit. This is particularly true of sites where proper fire control measures have not been employed.
- **Plant and equipment:** When not properly maintained, plant and equipment can pose a serious fire hazard. This is particularly true of mechanical equipment, due to the potential for friction to develop between moving parts of the equipment.
- **Electrical Faults (including damaged or exposed electrical cables):** Faulty electrics and non-compliant electrics are one of the most common causes for fires in the workplace. The main hazards include wiring not meeting the relevant standards, exposed wiring, overloaded circuits and power outlets, extension cords, and static discharge. All of these have the potential to generate a spark, which has the potential to act as an ignition source.
- **Discarded smoking materials:** Smoking materials have the potential to ignite a fire if they come into contact with flammable or combustible materials.
- **Hot works:** Hot works, commonly including welding and torch cutting, have the potential to cause a fire as a result of the sparks and molten material which are generated during their operation. These can become hot, and could ignite a fire if they come into direct contact with flammable/combustible materials.
- **Industrial heaters:** Industrial Heaters can become a potential fire hazard if a fault develops, allowing issues such as over-heating to develop within the device. This hazard is worsened by the heaters being left turned on and unattended.
- **Hot exhausts and engine parts:** The settling of dust on hot exhausts and hot engine parts can cause a fire as a result of the heating up of the materials. This could become a hazard both during operation and post-operation.
- **Ignition sources:** Other ignition source such as naked flames must be kept away from combustible or flammable materials.
- **Batteries:** batteries are safe during normal use but present a risk when over-charged, short-circuited, submerged in water or damaged.
- **Leaks and spillages of oils and fuels:** Oils and fuels are flammable (and potentially explosive), therefore if they leak or are spilled within the site boundary they are liable to present a risk of fire should an ignition source interact with it.
- **Build-up of loose combustible waste, dust and fluff:** Loose combustible waste creates more opportunity for interaction with potential ignition sources, increasing the likelihood of a fire starting.
- **Reaction between Wastes:** If incompatible wastes are stored together, they have the potential to react and potentially lead to a hazardous situation. Common outcomes of the mixing of hazardous wastes include heat generation, flammable gas generation, explosions or fire.
- **Hot loads:** wastes at elevated temperatures or containing contaminants can lead to ignition.
- **Hot and dry weather:** external heating of waste during hot and dry weather can increase the risk of fire occurring.

## 5. PREVENTION MEASURES

5.1. Table 4 provides a summary of the preventative measures to be implemented at the Facility in order to reduce the risk posed by the common causes of fire outlined in Section 4 above.

**Table 4: Preventative Measures**

Cause	Preventive Measure
Waste Pile Sizes	<ul style="list-style-type: none"> <li>See Table 2 and 3 for volumes of waste stored on site any one time.</li> <li>Markers will be drawn onto bay walls/floors to indicate maximum waste storage areas/ sizes; and</li> <li>Waste will be stored in designated areas as indicated on the Fire Prevention Plans (Drawing Reference KMTL.01.01-04).</li> </ul>
Arson and Vandalism	<ul style="list-style-type: none"> <li>The access doors and gates are permanently locked out of hours and can only be opened by a limited number of site personnel to restrict unauthorised access into the Facility;</li> <li>The site is monitored 24/7 by a specialist fire and security company, namely Marlowe Fire and Security.</li> <li>The Facility will be covered by CCTV for security purposes. Marlowe Fire and Security shall alert senior management to any unusual activity, such as movement from intruders. Senior Management will also be able to view live footage of the CCTV via a mobile application and can attend site immediately if required. The CCTV cameras survey all areas of the Facility. The exact locations are not shown on the site plans as this document will be made available on the public register and therefore, would be a security concern if exact CCTV locations are marked;</li> <li>A visitor sign-in system will be in place. In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented; and</li> <li>Records will be maintained and will include inspections and maintenance of security fencing and doors, breaches of security, investigations and actions taken. In the event that damage or deterioration is sustained to site infrastructure, repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the Facility and permanent repairs will be made as soon as practicable.</li> </ul>
Storage Duration	<ul style="list-style-type: none"> <li>All wastes will be stored and treated on impermeable surfacing;</li> <li>Maximum waste storage times are detailed in Table 2 and 3. The maximum storage time is 1 month. The aim is to process the incoming material and arrange for its export off site as soon as practically possible to minimise over-stocking which in-turn minimises the risk of overheating and spontaneous combustion.</li> <li>All waste will be tracked with date received and will be processed in date order;</li> <li>Waste will be checked and monitored on a daily basis by the Site Manager; and</li> <li>There are no seasonal variations in opening times.</li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventive Measure
Training	<ul style="list-style-type: none"> <li>• Training will be provided to all site personnel in relation to how to prevent fires on site, how to identify fire risks and how to spot fires on site. Staff members will undertake a fire awareness course. Refresher training will be provided at regular intervals.</li> <li>• The Site Manager will ensure there is always a sufficient number of staff on site when the site is operational;</li> <li>• All staff and contractors on site will be made aware and understand the contents of the Fire Prevention Plan and the procedures that are in place in the event of a fire on site. This familiarisation training will be undertaken as part of the company's induction process and staff will be required to provide a signature to confirm and record that they have read and understood the contents of the FPP and associated procedures; and</li> <li>• All staff will be trained in isolation of the drainage system including the location of drainage isolation equipment, such as the drain cover; and</li> <li>• A fire drill will be held annually to simulate the processes which would be undertaken in the event of a fire or other similar emergency. Findings from the drill will be discussed and an action plan to address any opportunities for improvement will be implemented if necessary.</li> </ul>
Employee Awareness	<ul style="list-style-type: none"> <li>• All employees will complete a fire awareness course.</li> <li>• Employees will be made aware of: <ul style="list-style-type: none"> <li>• the actions to be taken on discovery of fire and on hearing a fire alarm;</li> <li>• the location of manual fire alarm call point and the method of operation;</li> <li>• the location of firefighting equipment and the method of operation;</li> <li>• all escape routes within the building;</li> <li>• evacuation procedures for the Facility and the location of the assembly point.</li> <li>• All employees will be aware of the methods of fire prevention as detailed below:</li> <li>• should an employee consider that something or someone presents a fire risk, they will report the matter to the Site Manager;</li> <li>• employees will not allow the accumulation of large amounts of combustible materials around workplaces or escape routes;</li> <li>• employees will not obstruct fire escapes, fire exits or any fire-related equipment; and</li> <li>• smoking is prohibited inside the buildings or in the waste processing or storage areas.</li> </ul> </li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventive Measure
Monitoring	<ul style="list-style-type: none"> <li>No waste will be stored on site longer than 1 month;</li> <li>Skip waste will have a maximum storage duration of 2 months.</li> <li>Site operatives will undergo training on the management of waste, including, recognising hot spots within waste and managing hotspots.</li> <li>Hot spots will be prevented by: <ul style="list-style-type: none"> <li>ensuring waste within the storage areas is sufficiently rotated and waste storage time is minimised. Site operatives will ensure that the oldest materials are always processed and removed and a clear method to record and manage the storage of all waste on site; and</li> <li>waste will be visually inspected throughout the day and where appropriate findings logged within the Site Diary at the end of each working day as a minimum.</li> </ul> </li> </ul>
Actions to Limit Self Heating	<ul style="list-style-type: none"> <li>Effective stock management limits the likelihood of the self-combustion of materials stored on site. As such, the operator will have waste acceptance and stock management procedures which are followed by all employees at the site;</li> <li>Stocks of unprocessed and processed waste materials will be managed as follows, to minimise self-combustion: <ul style="list-style-type: none"> <li>waste volume, height and storage times will be minimised on site and hence stored materials will be rotated whilst held on site; and</li> <li>where possible and practicable, material is stored in its largest form prior to processing.</li> </ul> </li> <li>the following measures will also be implemented on site to reduce self-combustion: <ul style="list-style-type: none"> <li>separation of materials;</li> <li>isolation of combustible materials; and</li> <li>restricting storage times first in first out principle processing waste at the rear of the bay then moving towards the front.</li> </ul> </li> </ul>
Plant and Equipment	<ul style="list-style-type: none"> <li>In addition to fixed plant, mobile plant is limited to: <ul style="list-style-type: none"> <li>4 x forklift truck ("FLT");</li> <li>2 x skid steer loader;</li> <li>2 x material handler; and</li> <li>1 x 32t hooklift heavy goods vehicle ("HGV").</li> </ul> </li> <li>Plant and equipment are located away from combustible materials, including mobile plant when not in use. The proposed location is illustrated on the Site Layout Plan (KMTL.01.02-02).</li> <li>Only trained operators will be authorised to operate plant and equipment.</li> <li>Site vehicles will be kept to a minimum.</li> <li>Vehicles will be fitted with fire extinguishers;</li> <li>A number of measures will be implemented to prevent fuel and combustible liquids leaking or trailing from site vehicles: <ul style="list-style-type: none"> <li>site vehicles subject to annual servicing and maintenance checks;</li> </ul> </li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventive Measure
Plant and Equipment (Cont.)	<ul style="list-style-type: none"> <li>the plant check and defect report sheet is provided in Appendix II. Daily checks, such as evidence of obvious leaks, hydraulic fluid levels, operating systems, undertaken on site vehicles prior to use;</li> <li>A procedure for reporting any faults or maintenance concerns to prevent any foreseeable breakdowns or leaks;</li> <li>A procedure for immediate reporting of fuel leaks or spillages;</li> <li>in the unlikely event of a fuel leak, spill kits will be deployed to clean up any fuel spillage and prevent entry to the onsite drainage systems;</li> <li>any delivery vehicle allowed entry onto site must be serviced and MOT road worthy;</li> <li>any evidence of leaks from these vehicles will be recorded and communicated. Further entry to site will be refused until repairs have been made.</li> <li>operatives will be required to complete inspection records for all plant on a regular basis. All plant will be operated, maintained and serviced in line with manufacturer's recommendations and instructions. Instruction Manuals for plant and equipment will be held on site;</li> <li>A service schedule, as well as records of all servicing and maintenance will be held in the site office;</li> <li>inspection of plant and equipment will be undertaken on a weekly basis to check for faults and ensure appropriate safeguards are in place;</li> <li>training will be provided to staff in the safe operation of plant and equipment relevant to their role;</li> <li>in the event of a failure on a piece of equipment or plant, 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; and</li> <li>at the end of the working day, mobile plant will be stored away from any stocks of waste materials.</li> </ul>
Infrastructure and Site Inspections	<ul style="list-style-type: none"> <li>Due to the nature of the waste accepted at Facility, dust build-up will be minimal;</li> <li>The site will be continuously inspected by operatives throughout the working day;</li> <li>A daily inspection and cleaning procedure will identify and eliminate dust. The site manager or nominated deputy will be responsible for ensuring the execution of these activities. Any actions required as result of the inspection will be recorded in the site diary.</li> <li>Waste will be visually inspected throughout the day and all findings logged in the site diary at the end of each working day. All staff will be trained in how to identify fires and fire hazards on site;</li> <li>As part of the Environmental Management System ("EMS"), monthly infrastructure inspections will be carried out, including integrity checks of the impermeable site surfacing; and</li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventive Measure
Infrastructure and Site Inspections (cont.)	<ul style="list-style-type: none"> <li>During the inspection, site vehicles and treatment equipment will be visually checked for defects, fuel leakages and the build-up of dust. The site yard and internal areas will also be visually inspected and will be swept if required. Electrical panels will be boxed and will be included in the daily site inspection.</li> </ul>
Electrical Faults	<ul style="list-style-type: none"> <li>Regular safety checks and daily site inspections will be recorded in the site diary;</li> <li>All buildings electrics will be fully certified by a qualified electrician and inspected at a frequency of 3 years in accordance with the FRA; and</li> <li>Annual Portable Appliance Testing ("PAT") testing of any portable electrical appliances will be carried out at a frequency of every 2 years.</li> </ul>
Ignition Sources	<ul style="list-style-type: none"> <li>Hot works is not undertaken and gas bottles are not stored at the Facility.</li> <li>Sources of ignition will be kept at least 6 metres away from combustible and flammable materials.</li> <li>A safe use policy for portable heaters (used within office areas) will be in place which states: <ul style="list-style-type: none"> <li>the use of such heaters will be kept to a minimum;</li> <li>staff will be fully trained in their use;</li> <li>they will undergo PAT every 2 years in accordance with the site's FRA to ensure the safety and compliance of equipment;</li> <li>they will be placed at a safe distance from any flammable material;</li> <li>they will not be covered by any material or clothing items; and</li> <li>will be turned off and unplugged when unattended; and</li> </ul> </li> <li>smoking is prohibited inside the building and employees must adhere to the strict smoking policy. Smoking is only permitted externally, a significant distance from waste storage and processing areas.</li> </ul>
Heat and Spark Prevention	<ul style="list-style-type: none"> <li>No burning, reactive/reacting or visibly hot (producing steam or heat) loads will be accepted on site. Loads will be visually inspected at the site entrance to ensure compatibility with accompanying delivery notes, therefore minimising prohibited wastes. A quarantine area for hot loads is not required as hot loads are not received or processed at the site. In the very unlikely event that a hot load is identified on delivery, it would be rejected and immediately returned to the supplier and therefore, not accepted onto site;</li> <li>Vehicles will be turned off when not in use. Consideration will be given to the high-risk time for hot exhausts (one hour after switch off when dust can settle on hot surfaces) and vehicles will be given time to cool down prior to site staff leaving site at the end of each day;</li> <li>Flammable/combustible materials will be stored in designated areas away from frequent vehicle movements;</li> </ul>

**Table 4: Preventative Measures (Cont.)**

Cause	Preventive Measure
Gas Bottles and Other Flammable Items	<ul style="list-style-type: none"> <li>No hot works will be undertaken at the Facility; and</li> <li>Waste gas cylinders and bottles will not be accepted on site. If a cylinder or bottle is detected in an incoming waste load, it will be immediately rejected and returned to the supplier.</li> </ul>
Fire Detection and Suppression	<ul style="list-style-type: none"> <li>The fire detection system consists of smoke heat detectors covered by an appropriate third-party certification scheme.</li> <li>There are fire call points in the building to alert of a fire;</li> <li>The site will be manned throughout the working day and the alarm will sound immediately on the identification of any fire on site.</li> <li>During out of hours, the extensive CCTV coverage as well as the 24/7 Marlowe Fire and Security personnel acting as fire watch would enable a fire to be immediately identified and the Site Manager would be contacted to attend site.</li> <li>Visual checks during and at the end of the working day will ensure signs of fire (smoke, odour, steam, heat haze) are detected.</li> <li>The Facility will benefit from manual fire suppression in the form of fire extinguishers. See Section 6.5. for more detail.</li> </ul>
Reactions Between Incompatible Materials	<ul style="list-style-type: none"> <li>Strict waste acceptance procedures will be implemented at the Facility to ensure only permitted materials are accepted;</li> <li>All loads are covered by appropriate waste documentation. Employees are under instruction to reject the load if incoming waste or materials have been identified which have not been previously agreed and stated on the waste documentation. If the non-conforming waste cannot be rejected immediately, it will be packaged and labelled to be removed from site within 24 hours utilising the FPP Quarantine Area.</li> <li>The site will accept commercial and industrial wastes which are unreactive, and it is unlikely that there would be occasion where incompatible wastes would come into contact. However, to ensure that the risk continues to be minimised, the Operator will: <ul style="list-style-type: none"> <li>consider each waste stream that is due to come onto the site, in terms of what it is likely to contain based on the information supplied by the waste producer;</li> <li>determine whether there is potential for combustible material within the waste stream and what potential reactions could occur if the material came into contact with other materials on the site in order to evaluate any potential risks to ongoing activities;</li> <li>store incompatible wastes away from any known incompatible materials;</li> </ul> </li> </ul>
Hot and Dry Weather	<ul style="list-style-type: none"> <li>In the event of a sustained heatwave (extreme temperatures and minimal rainfall) where waste is stored externally, maximum storage times can be evaluated and reduced if necessary.</li> </ul>

## **6. FIRE MANAGEMENT AND IMPACT REDUCTION**

### **6.1. Emissions**

6.1.1. In the event of a fire, the following emissions would be anticipated:

- combustion gases released to atmosphere – these would be relatively short lived and would not cause any significant adverse environmental effects; and
- potentially contaminated firewater/foam on impermeable concrete immediately surrounding the source of the fire where the firewater/foam would be applied.

### **6.2. Waste Acceptance**

6.2.1. Strict waste acceptance procedures will be implemented to ensure that only permitted materials are accepted. Only permitted waste types detailed in Table 2.2. of SR2015 No. 16 will be accepted at the Facility.

6.2.2. All staff receiving waste will be fully trained and will be able to detect any non-conforming materials at the point of arrival on site. All loads will then be checked upon receipt and a checking procedure will be in place to identify non-conforming materials.

6.2.3. Non-conforming waste is described as any waste that:

- the Facility is not authorised to accept in the permitted list of EWC codes
- is not recorded on the accompanying waste documentation; and
- would not be expected to be present.

6.2.4. In the unlikely event that, non-conforming materials arrive on site, at the unloading and inventory stages, the non-conforming material would be identified. The non-conforming material will not be accepted at the site and will be returned to the supplier.

6.2.5. If this is not possible, the non-conforming waste will be removed from site to an appropriately licensed Facility or Installation within 24 hours days.

6.2.6. Records will be maintained which detail a description of the waste, data and time of arrival on site and original producer details.

6.2.7. The paperwork maintained at the Facility will also include:

- accurate recordings of the nature and quantity of waste to be held on site;
- identification of where waste is located;
- identification of staff who may have taken decisions regarding acceptance/rejection of waste streams;
- comparison of total quantities of waste on site compared against total permitted; and
- recording the time the waste has been on site to enable implementation of the 'first in, first out' principle.

### **6.3. Site Infrastructure**

- 6.3.1. The Facility consists of a main operational building and an external concreted area.
- 6.3.2. The Facility infrastructure is illustrated in the Site Layout Plan (Drawing Reference KMTL.01.01-02) which is contained in Appendix I of this FPP.
- 6.3.3. All waste will be stored and treated on impermeable concrete surfacing.
- 6.3.4. The fire exit is an important part of a building's fire defences. The fire exit door can be opened in the event of the fire alarm sounding and leads to the fire assembly/muster point.

### **6.4. Drainage**

- 6.4.1. The Facility benefits from impermeable concrete surfacing throughout, therefore no downward migration of potentially contaminated firewater to either land or groundwater will occur.
- 6.4.2. The site building is isolated from the drainage network. The location of the drainage line is illustrated in KMTL.01.01-04 contained in Appendix I.
- 6.4.3. Any potentially polluting spillages at the Facility which could potentially enter the drainage system will be subject to the Facility's robust spill management procedure, which would prevent such an occurrence. As discussed, this includes deployment of a drain cover.
- 6.4.4. The location of the site spill kit is illustrated in drawing KMTL.01.01-04. The spill kit will be checked every 3 months by site personnel and will be replaced as per the manufacturer's defined expiration dates if provided or alternatively, when on visual inspection, it is deemed necessary.
- 6.4.5. Containment equipment storage areas are located such that the materials can be retrieved quickly and reducing the risk to staff.
- 6.4.6. Kas Metal will not continue to accept waste if there is an active fire on site. Waste will be diverted to a nearby suitably licensed site and, if possible, waste producers will be notified in advance to prevent delivery vehicles arriving on site. A Kas Metal representative will be stationed at the entrance of the Facility on the main road to divert any delivery vehicles which were on route when the fire began.
- 6.4.7. Should fire compromise the stability or integrity of the building, all personnel on site will be immediately evacuated and the FRS will be contacted.

## **6.5. Containing and Mitigating Fires**

- 6.5.1. Portable fire extinguishers compliant with BS 53006 will be provided in accordance with codes of practice within the building and within all site mobile plant.
- 6.5.2. Nominated personnel will be trained in the use of such equipment. The maximum time it would take for a nominated person to attend site out of hours in an emergency scenario is 20 minutes.
- 6.5.3. The fire extinguishers will be serviced as part of an annual inspection contract. All extinguishers will also be checked as part of the site inspection programme.
- 6.5.4. The locations of the firefighting equipment are shown on the Fire Prevention and Mitigation Plan (Drawing Reference KMTL.01.02-04).
- 6.5.5. An up-to-date site plan will be on display and will detail:
- the site layout;
  - waste storage arrangements;
  - firefighting equipment locations;
  - fire detection equipment locations; and
  - location of personal protective equipment ("PPE") and firewater containment equipment.

## **6.6. Site Procedures During a Fire Incident**

- 6.6.1. The following procedures will be in place at the Facility which will be followed in the event of a major fire onsite:
- the Operations Director, Site Manager, FRS and adjacent businesses will be notified immediately, the EA will be notified as soon as practicable;
  - 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;
  - waste skips will be moved to an appropriate area within the permitted area which will be dependent on the location of the fire at the Facility. Skips will be moved as soon as reasonably practicable to prevent the fire from spreading using site mobile plant;
  - the Operations Director or nominated deputy will divert incoming wastes to alternative sites during a fire;
  - FRS will be informed on arrival at the site of the presence of POPs and the Fire Prevention Plan drawing (KMTL.01.01-04) will be reviewed and discussed with emphasis placed on the location of the waste types which contain POPs;
  - firewater will be contained within the site building and the drain cover deployed (any firewater held within the containment area will be tested before removal offsite to a suitably licensed Facility once the fire has been extinguished. Special consideration during analysis will be given to the presence of POPs and the firewater will be sent to the appropriately licensed Facility in accordance with the POPs Regulations);

- if possible, waste that is unburnt will be dampened down to prevent the fire from spreading further and any contaminated runoff will be held within the building which is isolated from the drainage network;
- if possible, unburnt material will be separated from the fire using site plant; and
- depending on the scale of the fire, the site and adjacent business premises will be evacuated.

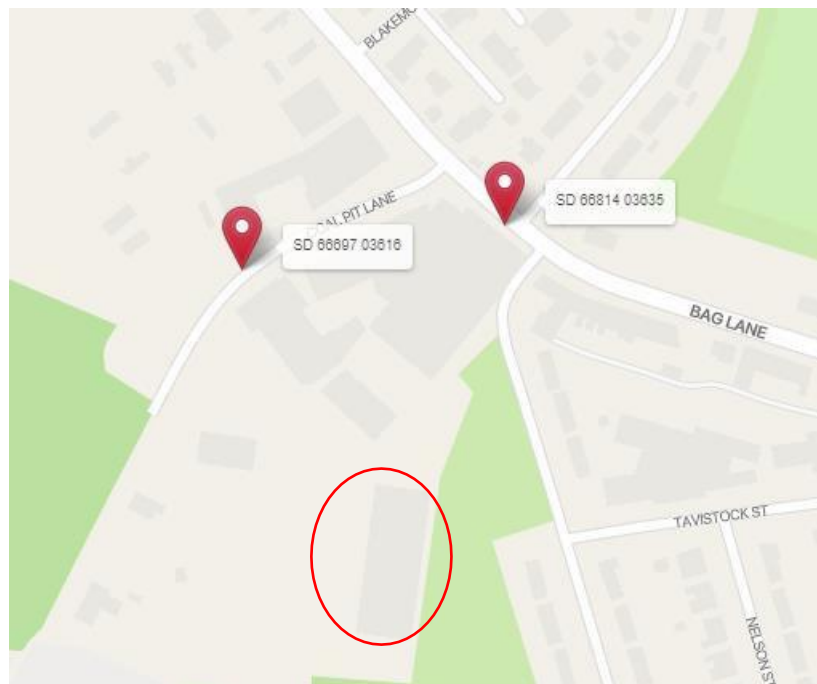
## 6.7. Notifying Residents and Businesses

- 6.7.1. A Site Information and Key Contacts List is provided in Appendix III of this document which provides the contact details of internal and external contacts to notify in the unlikely event of a fire on site. Out of hours telephone contact numbers are also provided.
- 6.7.2. An emergency pack including a copy of the Fire Prevention and Mitigation Plan will be located at the main entrance enabling the FRS to quickly access the information required should the site be unattended out of hours. As previously mentioned, a copy of the FPP will also be provided to the FRS for their records.

## 6.8. Water Supply

- 6.8.1. Greater Manchester FRS has confirmed that water to actively fight a fire will be available from two fire hydrants (See Figure 3), maintained and inspected by Greater Manchester FRS located 80m and 130m from the Facility on Coal Pit Lane and Bag Lane respectively:
- FH 56015009 is located on a 100mm United Utilities Water Main SD 66697 03616.
  - FH 56015007 is located on a 160mm United Utilities Water Main SD 66814 03635.

**Figure 3: Fire Hydrant Locations Provided by Greater Manchester FRS**



- 6.8.2. It was also confirmed by Greater Manchester FRS that the hydrants conform to BS 750 and are due to be inspected this year with the last inspection undertaken in 2021. It has also been confirmed by Greater Manchester FRS that In the event of a fire incident at the Facility, water could be pumped via hose. On request a high-volume pump or hose layer could be requested to deliver increased quantities of water to the fire. This would depend on the type and size of the incident and would be the decision of the incident commander on the day. The email correspondence is provided in Appendix III of this document.
- 6.8.3. The water supply requirement calculations are provided in Table 5. It is clearly shown that there is enough water available for firefighting to take place and to manage a reasonable worst-case scenario.

**Table 5: Water Supply Requirement Calculations**

Maximum pile volume (m <sup>3</sup> )	Water supply needed (l/min)	Overall water supply needed over 3 hours (l)	Total water available on site (l/min)
86	Pile volume x 6.67 <b>573.62</b>	Water supply per minute x 180 <b>103,252</b>	Fire hydrant - flow rates available to site: 75 litres/second <b>4,500 litres/minute</b>

## 6.9. Firewater Containment Measures –Containers

- 6.9.1. Containers are stored in such a way so as to provide accessibility if a fire inside it needs to be extinguished. Kas Metal are able to move the containers to prevent the fire from spreading using plant equipment.
- 6.9.2. Containers will be moved to an appropriate area within the permitted area using the Facility's mobile plant as soon as reasonably practicable. The location within the permitted area to which containers will be moved will be dependent on the location of the fire at the Facility and the access required to other areas of the site to aid in firefighting efforts. FRS instruction and advice will be followed.
- 6.9.3. Applying the Combustion Triangle model, it is considered unlikely that enough oxygen would be readily available to enable a fire to thrive within the storage containers. Therefore, it is highly probable that the fire would extinguish itself presenting a very low risk of the fire spreading. However, in the event that a fire in a container occurred, the container itself would localise contaminated firewater and minimise its release.

## 6.10. Firewater Containment Measures

- 6.10.1. Any potentially contaminated firewater runoff will be prevented from reaching sensitive receptors and causing pollution to the environment.
- 6.10.2. All waste will be stored and treated within the EP boundary, all areas of which benefit from impermeable surfacing, therefore, no downward migration of potentially contaminated firewater to either land or groundwater will occur.

- 6.10.3. In order to manage potentially contaminated firewater, all firewater will be applied within the building. The building is isolated from the drainage network. In order to provide additional protection to the environment, in the event of a fire, impermeable booms will be strategically positioned at the entrances to ensure the firewater is held within the building. Drain mats will be used externally as a further precautionary measure.
- 6.10.4. Impermeable booms will be stored within the site spill kit which is illustrated on drawing KMTL.01.01-04 and will be checked every 3 months by site personnel. Booms will be replaced as per the manufacturer's expiration dates if provided, or alternatively, when on visual inspection, it is deemed necessary.
- 6.10.5. Contaminated firewater will be removed off site via a specialist 24 hour spill response contractor. The firewater will be tested and disposed of at a suitably licensed Facility or Installation. Contact details of the spill response contractor are provided in Appendix III of this FPP.
- 6.10.6. The Operations Director and nominated deputy will be trained in the use of firewater containment measures, and the locations of the booms and drain mats. The FPP exercise drills will include differing fire scenarios and the deployment of the appropriate firewater containment measures. This is also described in Section 5 Table 4 – 'Training'.
- 6.10.7. Kas Metal has the capability of deploying firewater containment measures within a matter of minutes during operational hours and a maximum of 20 minutes out of hours. The location of the firewater containment equipment is indicated on the Fire Prevention and Mitigation Plan (KMTL.01.01-04).

## 6.11. Firewater Containment Capacity

- 6.11.1. Taking into consideration the available internal floorspace of the building (1,043m<sup>2</sup>) and a worst-case scenario height of 0.1m (height of the boom), an estimated 104.3m<sup>3</sup> of firewater will be contained. Therefore, it has been calculated that the maximum containment capacity available is in excess of the 103m<sup>3</sup> which needs to be contained (See Table 5).

## 6.12. Fire Incident Recording

- 6.12.1. After a fire event, the following procedure will be implemented depending on the severity of the fire:
- *small and containable fire that can be dealt with in-house using suitably trained staff and firefighting equipment located on site* - the fire will be recorded in the site log, including the causes of the fire and methods used to manage the fire.
  - *larger fire that requires the presence of the FRS* - if the site operatives have been told to evacuate or cease operations by the EA and/or FRS, the site personnel will wait until told it is safe to re-enter the site. The fire will be recorded in the site log, including the causes of the fire and methods used to manage the fire.
- 6.12.2. The Operations Director will liaise with the EA to determine a plan of action to introduce waste operations at the Facility and the timescales involved to achieve this.

### **6.13. Fire Damage Extent, Clearing and Decontamination**

- 6.13.1. The extent of the fire damage will be assessed by the Operations Director and depending on the scale of the fire; the FRS may also be present.
- 6.13.2. Should damage be determined to be sufficient to prevent the site from being able to treat and store waste, the Facility will cease accepting waste and will divert to a suitably permitted Facility.
- 6.13.3. Depending on the scale of the fire, smoke particles may have been transported and deposited onto various surfaces within the affected building. The thermal degradation of certain material can cause corrosive deposits to be omitted within the smoke particulates. It is therefore important that such deposits are effectively neutralised.
- 6.13.4. A specialist company will be commissioned to undertake post fire clean up and smoke damage decontamination.
- 6.13.5. During a fire, waste material containing POPs may release the POPs into the air and be present in the firewater. POPs will not be released into a watercourse as the firewater will be contained through the deployment of bunds and drain covers preventing release to groundwater and or water. The impermeable surfacing present across the Facility will prevent contamination of land or groundwater.
- 6.13.6. The specialist company undertaking the post fire clean-up will be notified of the presence of POPs and ensure appropriate personal protective equipment (“PPE”) is worn and clean-up operations take the presence of POPs into account. Any POPs waste involved in a fire and any residues will be segregated and treated in line with the POPs Regulations.
- 6.13.7. The firewater used on site will be held and tested with special consideration for the presence of POPs during analysis to ensure the firewater is sent off site to the appropriately licensed Facility or Installation for treatment in accordance with the POPs Regulations.
- 6.13.8. The structural stability of fire damaged infrastructure will be assessed and approved by a professional prior to re-entry onto the site.
- 6.13.9. The FRS may have also isolated gas, electric and water supplies. These will be reconnected by a registered gas engineer, electrician or plumber. The integrity and functionality of the drainage system will also be assessed and approved by a professional prior to recommencement of operation.

### **6.14. Fire Damaged Waste**

- 6.14.1. A visual assessment will be carried out by the Site Manager to determine whether the waste can be treated on site. Wherever possible, unburnt wastes will be separated from fire damaged areas of waste. If waste has become mixed, then the waste will be removed from site to a suitably permitted Facility.
- 6.14.2. Any quarantined waste, waiting for removal from site, will be stored in a designated area to prevent the contamination of unburnt wastes on the site, as illustrated on the Fire Prevention Plan (KMTL.01.01– 04).

- 6.14.3. Burnt waste will be removed off site within 24 hours. The Fire Prevention Quarantine Area will benefit from at least 6m separation area to aid separation and management of wastes during an incident. Site staff will be trained in how to safely move quarantined waste to this area.

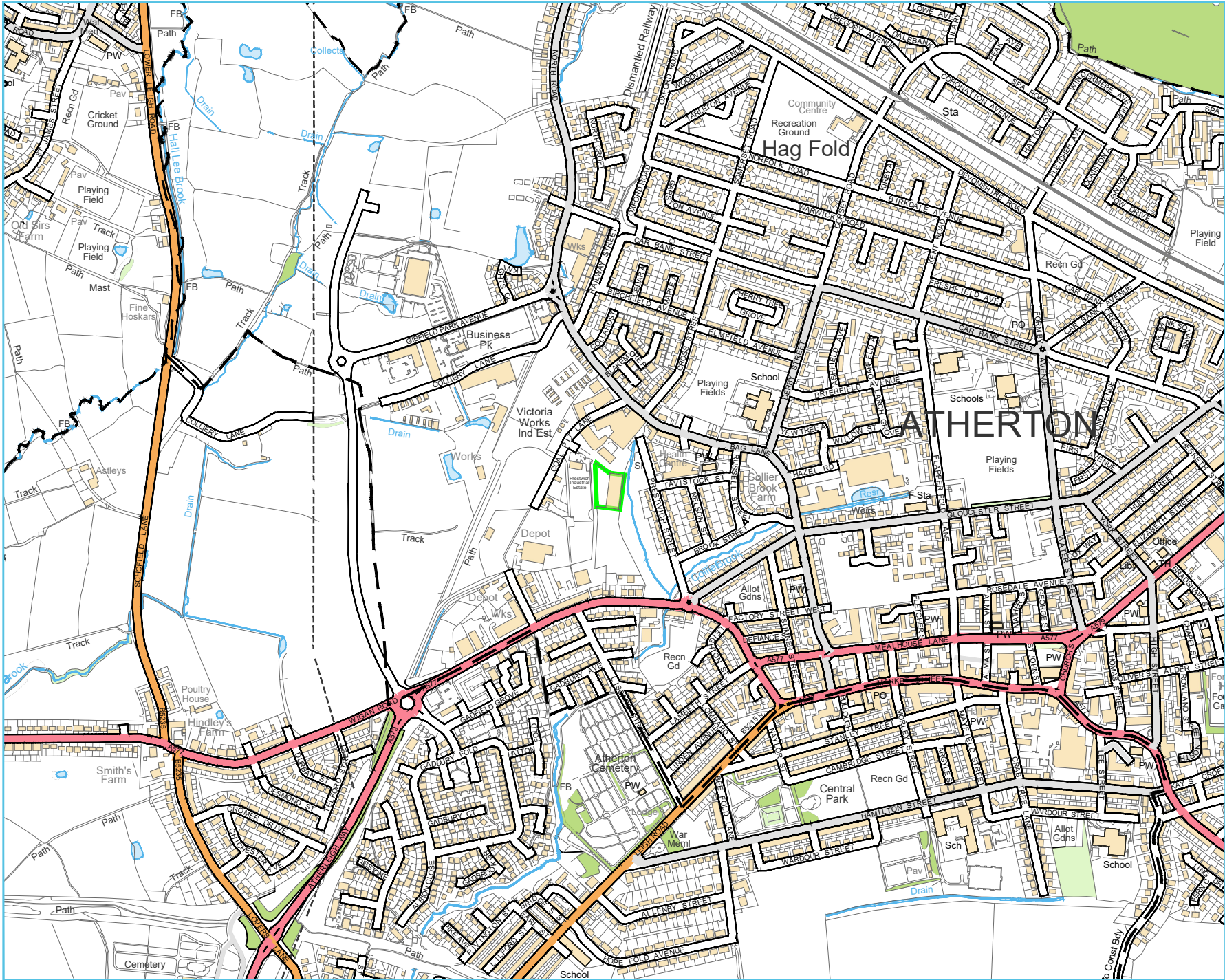
## **6.15. Recommencing Operations**

- 6.15.1. 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 Fire Prevention Plan.
- 6.15.2. Once this work has been undertaken, the Operations Director will visit the site to ensure all of the above have been undertaken and the Facility can recommence operations. The EA will be kept informed throughout this process.

## **7. CLOSURE**

- 7.1. This FPP is considered to be a 'working' document that will be reviewed and updated annually or as required should any of the following occur:
- a fire on site;
  - a change or review of legislation;
  - if the site is instructed to do so by the EA; or
  - a change to the contacts detailed in Appendix III.
- 7.2. It will be the responsibility of the Site Manager to maintain this FPP and to ensure it is adhered to in the event of a fire on site. This includes the responsibility to inform the FRS of the presence of POPs and the measures to follow as outlined in the plan.

## **APPENDIX I DRAWING**



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**LEGEND**

 ENVIRONMENTAL PERMIT BOUNDARY

Rev	Date	Details	Chkd
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**Environmental Compliance Ltd.**

Unit G1  
The Willowford  
Main Avenue  
Treforest Industrial Estate  
Pontypridd,  
CF37 5BF



Tel: 01443 801215  
Email: [info@ec.world](mailto:info@ec.world)  
Web: [www.ec.world](http://www.ec.world)

**Client**



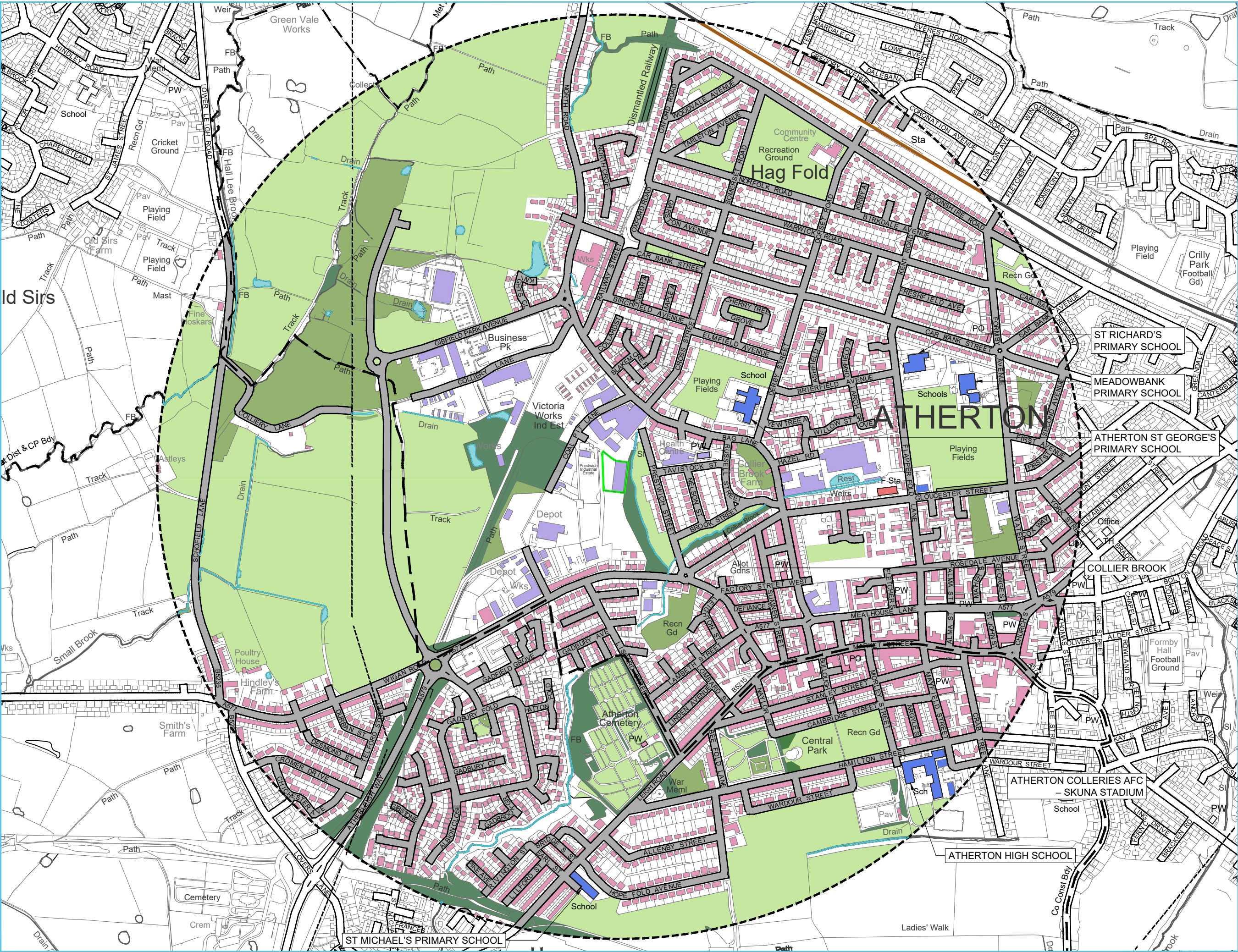
Date	Scale	Drawn by	Checked by	Approved by
13/10/2023	1:10K @ A4	GTB	SM	SM

**Drawing Status**  
**WORKING DRAWING**

**Project Title**  
ENVIRONMENTAL PERMIT APPLICATION  
KAS METAL TRADING LIMITED  
UNIT 3, COAL PIT LANE  
ATHERTON  
MANCHESTER. M46 0RY

**Drawing Title**  
SITE LOCATION PLAN

Drawing Number	Rev
KMTL.01.02-01	-



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**LEGEND**

- ENVIRONMENTAL PERMIT BOUNDARY
- 1000m OFFSET BOUNDARY
- DOMESTIC DWELLINGS
- COMMERCIAL PREMISES
- ROAD FEATURES
- RAILWAY LINES
- AREAS OF OPEN SPACE / FIELDS
- SHRUB
- WOODLAND
- WATER FEATURES
- SCHOOLS
- ATHERTON COMMUNITY FIRE STATION

RevDateDetailsChkd

**Environmental Compliance Ltd.**

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CF37 5BF

Tel: 01443 801215

Email: info@ed.world

Web: www.ed.world

Client

**kas**  
Metal Trading Ltd

Date13/10/2023

Scale1:7.5k @ A3

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CheckedbySM

ApprovedbySM

Drawing Status

**WORKING DRAWING**

Project Title

ENVIRONMENTAL PERMIT APPLICATION  
KAS METAL TRADING LIMITED  
UNIT 3, COAL PIT LANE  
ATHERTON  
MANCHESTER. M46 0RY

Drawing Title

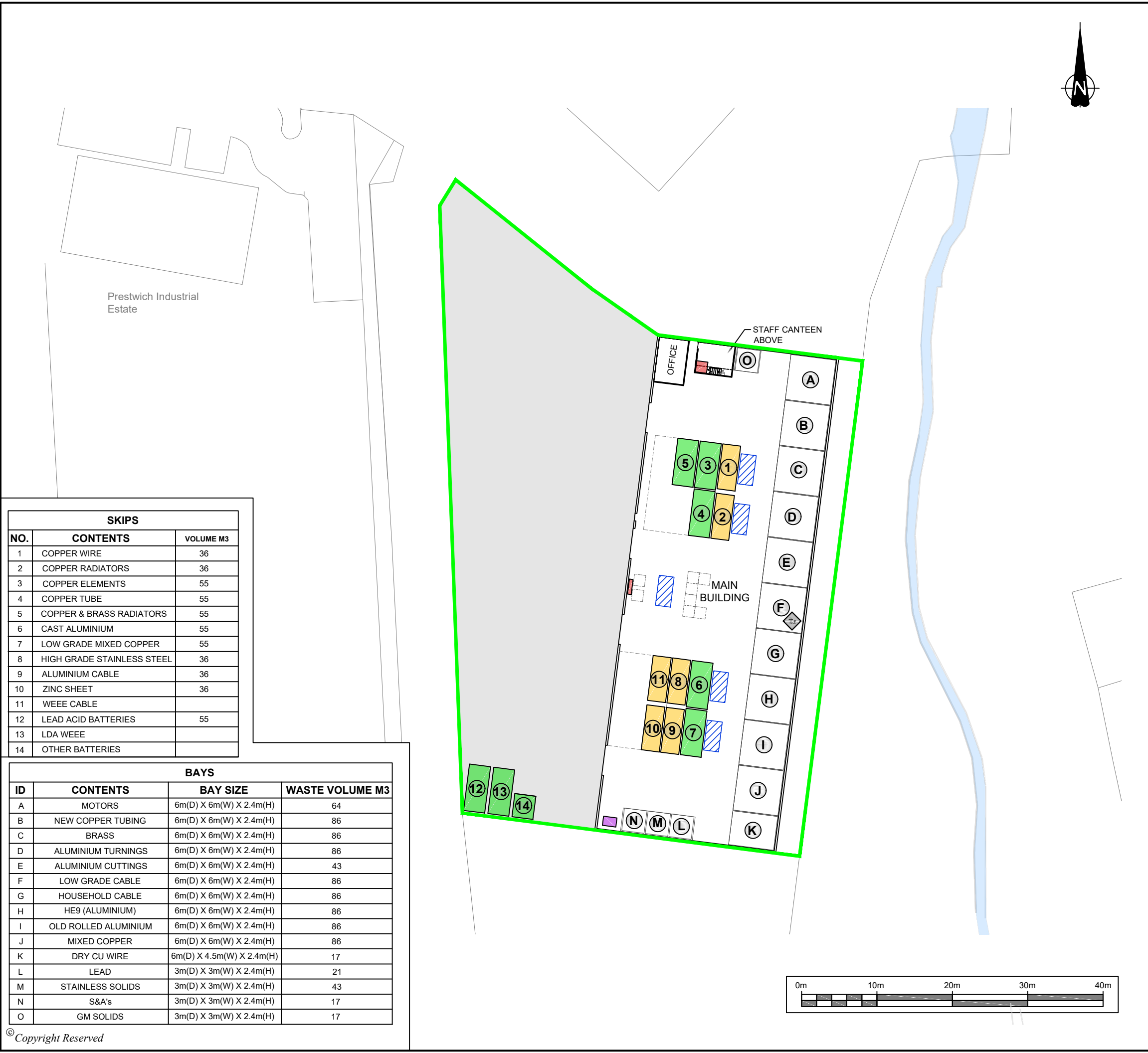
SENSITIVE RECEPTOR PLAN

Drawing Number

KMTL.01.02-03

Rev

-



DO NOT SCALE FROM THIS DRAWING

LEGEND

ENVIRONMENTAL PERMIT BOUNDARY

EXTERNAL SURFACING IMPERMEABLE CONCRETE

55 YARD SKIP - 6.2m(L) X 2.8m(W) X 3.3m(H)

40 YARD SKIP - 6m(L) X 2.4m(W) X 2.5m(H)

FLAMMABLE LIQUIDS

DIESEL TANK - 1.8m(L) X 1.22m(W) X 1.22m(H)

MOBILE PLANT MACHINERY

PERSISTENT ORGANIC POLLUTANTS

LAYOUT PROVIDED BY ENVIRONMENTAL COMPLIANCE LTD  
ENTITLED SITE LAYOUT PLAN, DRAWING No.KMTL.01.02-02,  
DATED 03-11-23

REVISION	DETAILS	DATE	DRN	CHK'D	APP'D
----------	---------	------	-----	-------	-------

CLIENT  
KAS METAL TRADING LTD

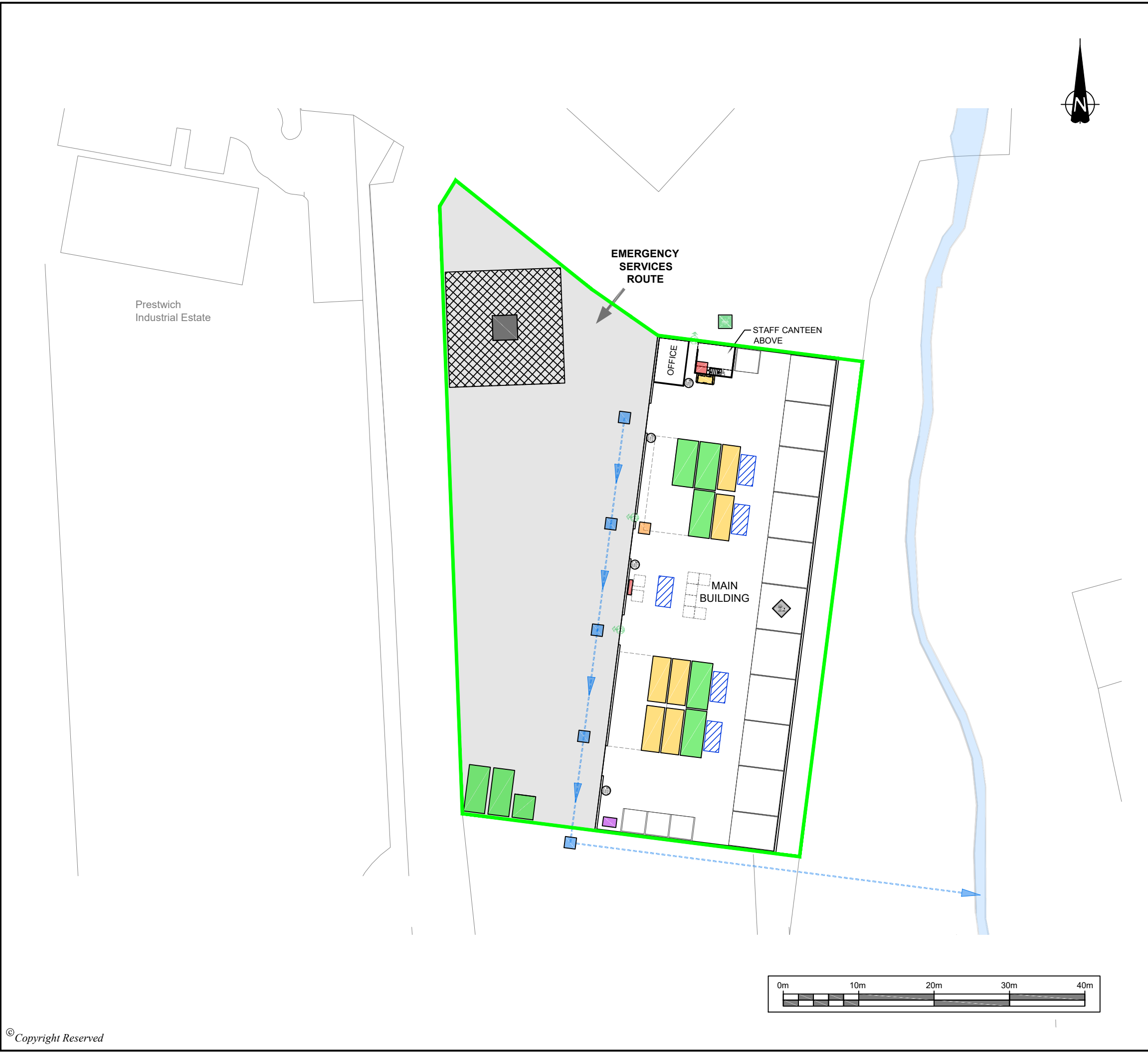
PROJECT  
ENVIRONMENTAL PERMIT APPLICATION  
UNIT 1  
ATHERTON, MANCHESTER

DRAWING TITLE  
SITE PLAN

DRG No.	NT17007-002	REV	P0	SUIT. CODE	
DRG SIZE	A3	SCALE	1:500	DATE	18-06-25
DRAWN BY	DR	CHECKED BY		APPROVED BY	

wardell  
armstrong

PART OF SLR



DO NOT SCALE FROM THIS DRAWING

LEGEND

ENVIRONMENTAL PERMIT BOUNDARY

EXTERNAL SURFACING IMPERMEABLE CONCRETE

55 YARD SKIP - 6.2m(L) X 2.8m(W) X 3.3m(H)

40 YARD SKIP - 6m(L) X 2.4m(W) X 2.5m(H)

FLAMMABLE LIQUIDS

DIESEL TANK - 1.8m(L) X 1.22m(W) X 1.22m(H)

MOBILE PLANT MACHINERY

PERSISTENT ORGANIC POLLUTANTS

QUARANTINE AREA 43m2 - 4m(H)

6m SEPARATION AREA

STORM DRAIN LINE

STORM DRAIN MANHOLE

EMERGENCY DRAIN COVER

SPILL KIT

FIRE EXTINGUISHER

FIRE EXIT

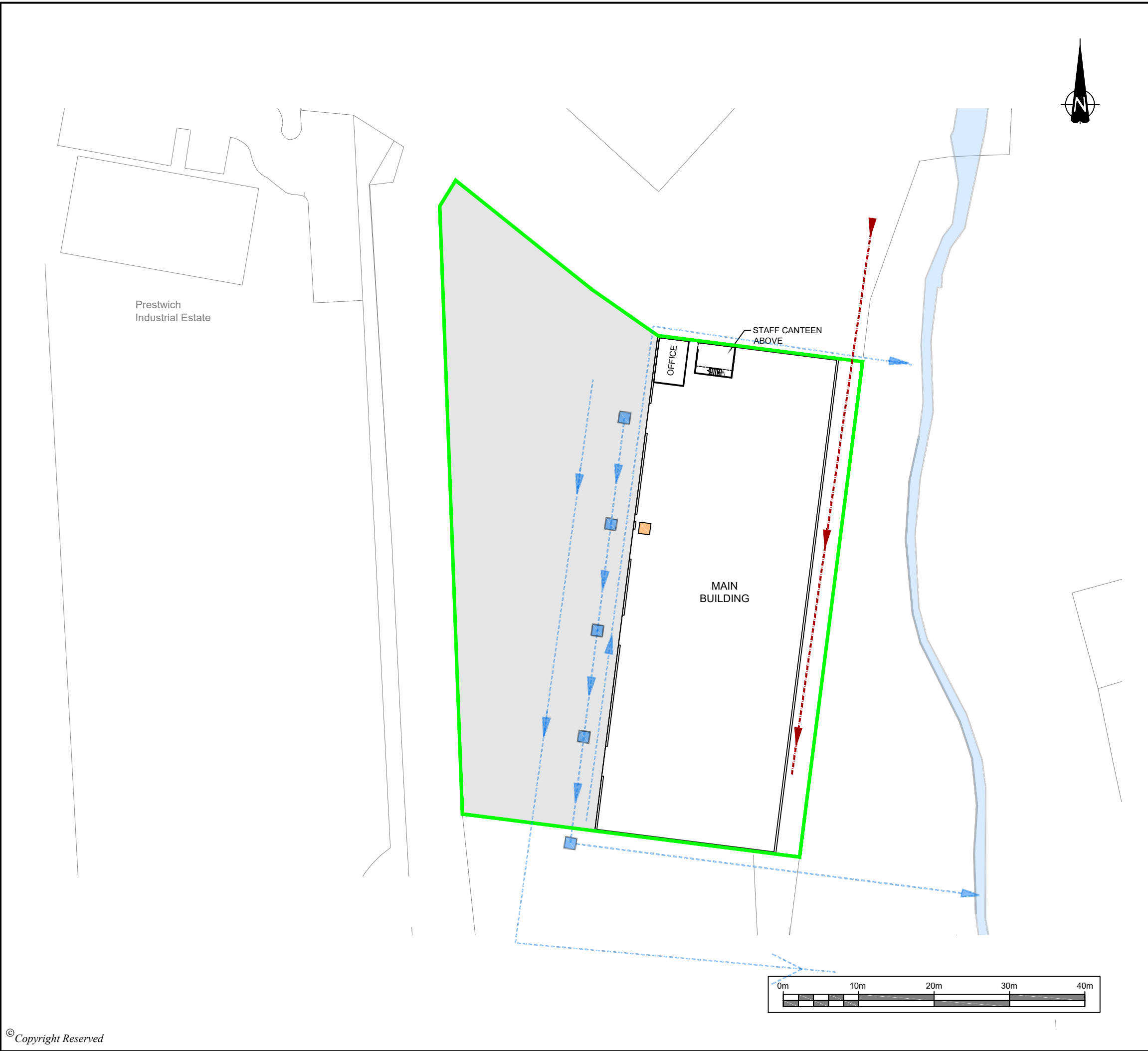
EMERGENCY ASSEMBLY POINT

LAYOUT PROVIDED BY ENVIRONMENTAL COMPLIANCE LTD  
ENTITLED SITE LAYOUT PLAN, DRAWING No.KMTL.01.02-04,  
DATED 03-11-23

REVISION	DETAILS	DATE	DRN	CHK'D	APP'D
CLIENT					
KAS METAL TRADING LTD					
PROJECT					
ENVIRONMENTAL PERMIT APPLICATION UNIT 1 ATHERTON, MANCHESTER					
DRAWING TITLE					
FIRE PREVENTION PLAN					
DRG No.		NT17007-003		REV	SUIT. CODE
A3		SCALE		P0	
DATE		18-06-25		APPROVED BY	
DRAWN BY		CHECKED BY		APPROVED BY	
DR					

wardell  
armstrong

PART OF SLR



DO NOT SCALE FROM THIS DRAWING

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
  - EXTERNAL SURFACING IMPERMEABLE CONCRETE
  - STORM DRAIN LINE
  - STORM DRAIN MANHOLE
  - EMERGENCY DRAIN COVER
  - FOUL DRAIN

LAYOUT PROVIDED BY ENVIRONMENTAL COMPLIANCE LTD  
ENTITLED SITE LAYOUT PLAN, DRAWING No.KMTL.01.02-04,  
DATED 03-11-23

REVISION	DETAILS	DATE	DRN	CHK'D	APP'D
CLIENT					
KAS METAL TRADING LTD					
PROJECT					
ENVIRONMENTAL PERMIT APPLICATION UNIT 1 ATHERTON, MANCHESTER					
DRAWING TITLE					
DRAINAGE PLAN					
DRG No.		NT17007-004		REV P0	SUIT. CODE
DRG SIZE A3		SCALE 1:500		DATE 18-06-25	
DRAWN BY DR		CHECKED BY		APPROVED BY	



## **APPENDIX II**

### **PLANT CHECK AND DEFECT REPORT SHEET**

### Plant Check & Defect Report Sheet

Drivers Name:		Plant:	
Date:		Start Hours Reading:	

✓ Compliant	X Defective	N/A Not Applicable
Engine Oil		Seat Belts
Hydraulic Oil		Access Steps
Transmission Oil		Handrails
Coolant		Fire Extinguisher
Greased		Quick Hitch
Flashing Light/Beacon		Head Lights
Cameras (if applicable)		Tail Lights
Reversing Bleeper		Indicators
Heating/Air Conditioning		Tracks
Windows/Wipers		Tyres – condition/pressure/nuts/wheels
Mirrors		Inspected for leaks
Brakes		Filter Cleaned
Handbrake		Washed
Seat Condition/Height Adjustment		Fuel Drawn (litres)
Bucket/Grab/Forks/Clamps		Serviced (if so please attach service sheet)
Steering		Other (please state)

I confirm that the above **Pre-use Plant checks** have been carried out prior to using the plant. All defects have been reported and any safety related items rectified.

Signed:	Print Name:
---------	-------------

### Driver's Report of Plant Defects

Defect Reported	
Defect Reported	
Defect Reported	
Action Taken	
Action Taken	
Action Taken	
Action Taken	

Comments:

I confirm that no defects have appeared on my vehicle other than those stated above and I have not used the plant without reporting defects.

Finish Hours:	Print Name:	Driver Signature:
---------------	-------------	-------------------

Defects Reported to:	Date:
----------------------	-------

## **APPENDIX III**

### **SITE INFORMATION AND KEY CONTACTS LIST**

Site Address		OPES CHESTERFIELD WASTE MANAGEMENT SITE, MANSFIELD ROAD, CORBRIGGS, CHESTERFIELD, S41 0JW	
Site Operator		KAS METAL TRADING LIMITED UK	
Contact	Description	Office Hours	Out of Hours
Internal			
Steve Corry	Operations Director and Technically Competent Manager	07776192075	
Rory Lonsdale	Kas Metal Employee	07944853116	
Karl Hook	Kas Metal Employee	07972434333	
External – Emergency Services			
Greater Manchester Fire and Rescue Service Atherton Community Fire Station	Fire - Emergency	999	
	Fire - Non-emergency	01942650303	
Medical Assistance	Ambulance Service (emergency only)	999	
	Nelson Street Surgery Ormerod House, Nelson St, Atherton, Manchester M46 0LE	01942557748	111
Greater Manchester Constabulary - Police	Police - Emergency	999	
	Police - Non-Emergency	101	
External - Regulator			
Environment Agency	Environmental Regulator 24 Hour Hotline	0800 80 70 60	
	EA Site Inspector	TBC	-
Health and Safety Executive	Health and Safety Regulator Incident Hotline (Fatal or Major Injury)	0345 300 9923	0151 922 9235
External – Key Contacts and Services			
United Utilities	Water Supplier and Sewage Provider	03456722999	
Distribution Network Operator – Electricity North West	Electricity Provider	08001954141 / 105	
Neighbouring Sites	Neary Construction	08452177150	
	MechaNicks	07795518370	
	Wholesale Sweets UK	01613028146	
	PF Furniture Ltd	01942871737	
	Pooches Play House Doggy Day Care Centre and Grooming Salon	07966705311	
	Meg Training Solutions Ltd	07788760086	
	Screenstretch Ltd	01942888747	
	Austin Wilkinsons & Sons Ltd	01942887000	
	Connaught Security Ltd	01204 531148	
	Atherton Creative Engineering Ltd	01942387117	
Drainrite Environmental Services Ltd	24/7 Emergency Tanker Services	01942 230023	
Environmental Compliance Ltd	Specialist Environmental Advisor	01443 801215	-

## **APPENDIX IV**

### **FRS FIRE HYDRANT CORRESPONDENCE**

**Archived:** 03 November 2023 13:30:55

**From:** Whittle Jane

**Sent:** Fri, 11 Aug 2023 10:15:11 +0000ARC

**To:** Sara Maile; G56 Watch Officers

**Subject:** FW: Kas Metal Trading Limited M46 0RY - Fire Hydrant Enquiry

**Sensitivity:** High

**Attachments:**

[image006.emz](#); [image008.emz](#)

---

Good morning Sarah.

In respect of the fire hydrant provision covering this site please see information and FH location map below.

Both FHs are maintained by Greater Manchester Fire and Rescue Service and conform to British Standard 750

- FH **56015009** is located on a 100mm United Utilities Water Main SD 66697 03616. Last inspected 15/06/2021 – inspection now due.
- FH **56015007** is located on a 160mm United Utilities Water Main SD 66814 03635. Last inspected 06/08/2021 – inspection now due.

[@G56 Watch Officers](#) could you please respond to the question below please?

*In the event of a fire on the site and the nearest fire hydrant was used, would pumps be used/tankers to carry the water or are extended hose layers available?*

Kind regards Jane



**Jane Whittle | Water Team Manager | Prevention & Protection**

Internal: 75059 | Direct dial: 01204 905159 | Mobile: 07764 465249 | Email: [whittlej@manchesterfire.gov.uk](mailto:whittlej@manchesterfire.gov.uk)

**Greater Manchester Fire & Rescue Service**  
**Bolton Borough**  
**Moor Lane**  
**Bolton**  
**BL3 5DB**



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 FIRE AND RESCUE SERVICE**

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Follow us on Twitter **@manchesterfire**

---

**From:** OBS Admin Bolton Wigan Salford Trafford <OBSAdminBoltonWiganSalfordTrafford@manchesterfire.gov.uk>  
**Sent:** Friday, August 11, 2023 9:22 AM  
**To:** Whittle Jane <whittlej@manchesterfire.gov.uk>  
**Subject:** FW: Kas Metal Trading Limited - Fire Hydrant Enquiry

Hi Jane

Is the email below for you? And do you have a general email to send fire hydrant related stuff to or do I send it straight to you?

Thanks

*Kind Regards*

*Sarah*

**Sarah Adams** | Organisational Business Support

Greater Manchester Fire and Rescue Service

Post: GMFRS Bolton Central Community Fire Station, Moor Lane, Bolton, BL3 5DB

Email: [sarah.adams@manchesterfire.gov.uk](mailto:sarah.adams@manchesterfire.gov.uk) Tel: [01204 905127](tel:01204905127)

Website: [www.manchesterfire.gov.uk](http://www.manchesterfire.gov.uk) | Twitter: @manchesterfire | Facebook: Greater Manchester Fire and Rescue Service (GMFRS)

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---

**From:** Sara Maile <[s.maile@ecl.world](mailto:s.maile@ecl.world)>  
**Sent:** Thursday, August 10, 2023 5:16 PM  
**To:** OBS Admin Bolton Wigan Salford Trafford <[OBSAdminBoltonWiganSalfordTrafford@manchesterfire.gov.uk](mailto:OBSAdminBoltonWiganSalfordTrafford@manchesterfire.gov.uk)>  
**Subject:** Kas Metal Trading Limited - Fire Hydrant Enquiry

You don't often get email from [s.maile@ecl.world](mailto:s.maile@ecl.world). [Learn why this is important](#)

Good afternoon,

We are preparing a Fire Prevention Plan for a waste facility located at Unit J, Coal Pit Ln, Atherton, Manchester M46 0RY – National Grid Reference SD 66767 03491 (site boundary below) .

The Environment Agency requires the Operator to detail the nearest firewater supply to their site in order to meet their guidance. Therefore, please can you provide the NGR locations for the nearest fire hydrants closest to the site for inclusion in the Fire Prevention Plan?

Please can you also confirm the fire hydrants conform to British Standard 750 or equivalent and are regularly serviced and maintained by the FRS (or other suitably qualified provider)?

In the event of a fire on the site and the nearest fire hydrant was used, would pumps be used/tankers to carry the water or are extended hose layers available?

We require the above information for the Fire Prevention Plan which must be submitted as part of an Environmental Permit application.

If you have any questions regarding the above or if the email needs to be sent to a certain department, please do let me know.

I look forward to hearing from you,

Kind regards,



**Sara Maile**  
**Principal Consultant**  
Tel: 01443 801215  
Mob: 07387 410079  
Website: [www.ecl.world](http://www.ecl.world)



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**Archived:** 03 November 2023 13:30:51

**From:** Murray Ian

**Sent:** Fri, 11 Aug 2023 19:46:45 +0000ARC

**To:** Whittle Jane; Sara Maile; G56 Watch Officers

**Subject:** RE: Kas Metal Trading Limited M46 0RY - Fire Hydrant Enquiry

**Sensitivity:** Normal

**Attachments:**

image004.emz; image012.emz

---

Hi Sarah,

With regards to your question, the hydrant used or hose/hose layer would be dependant on the size of the fire. Initial attending appliances would have enough hose to utilise the 100mm main outside the premises and would also be able to use the 160mm main with further appliances. If needed a hose layer or high volume pump can be requested to attend and deliver larger quantities of water. I hope this answers your question, if not please get back in touch and I will provide further information if I can.

Thanks

**Ian Murray**

Crew Manager | [Blue Watch](#) | G56 Atherton  
Greater Manchester Combined Authority  
01942 650302

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---

**From:** Whittle Jane <[whittlej@manchesterfire.gov.uk](mailto:whittlej@manchesterfire.gov.uk)>

**Sent:** Friday, August 11, 2023 11:15 AM

**To:** [s.maile@ecl.world](mailto:s.maile@ecl.world); [G56 Watch Officers](#) <[BoroughCommandWiganWatchManagersW56@manchesterfire.gov.uk](mailto:BoroughCommandWiganWatchManagersW56@manchesterfire.gov.uk)>

**Subject:** FW: Kas Metal Trading Limited M46 0RY - Fire Hydrant Enquiry

**Importance:** High

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**Jane Whittle | Water Team Manager | Prevention & Protection**

Internal: 75059 | Direct dial: 01204 905159 | Mobile: 07764 465249 | Email: [whittlej@manchesterfire.gov.uk](mailto:whittlej@manchesterfire.gov.uk)

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**Sent:** Friday, August 11, 2023 9:22 AM  
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**Subject:** FW: Kas Metal Trading Limited - Fire Hydrant Enquiry

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Thanks

*Kind Regards*

*Sarah*

**Sarah Adams** | Organisational Business Support

Greater Manchester Fire and Rescue Service

Post: GMFRS Bolton Central Community Fire Station, Moor Lane, Bolton, BL3 5DB

Email: [sarah.adams@manchesterfire.gov.uk](mailto:sarah.adams@manchesterfire.gov.uk) Tel: 01204 905127

Website: [www.manchesterfire.gov.uk](http://www.manchesterfire.gov.uk) | Twitter: @manchesterfire | Facebook: Greater Manchester Fire and Rescue Service (GMFRS)

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**To:** OBS Admin Bolton Wigan Salford Trafford <[OBSAdminBoltonWiganSalfordTrafford@manchesterfire.gov.uk](mailto:OBSAdminBoltonWiganSalfordTrafford@manchesterfire.gov.uk)>  
**Subject:** Kas Metal Trading Limited - Fire Hydrant Enquiry

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