PDA Plastics LTD

Fire Prevention Plan

PDA Plastics LTD

Commissioners Road

Strood

Rochester

Kent

ME2 4EB

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1. Introduction

1.1. This Fire Prevention Plan (FPP) has been produced on behalf of PDA Plastics LTD

1.2. An FPP is required by the Environment Agency as part of the bespoke permit application ref: EPR/LB3206LE/A001 to operate a physical waste treatment facility for the storage and treatment of uPVC window frames at Commissioners Road, Strood, Rochester, Kent, ME2 4EB (Site).

1.3. This FPP has been prepared in accordance with the Environment Agency guidance on Fire Prevention Plans: Environmental Permits (FPP Guidance), last updated on the 20th April 2023 The FPP Guidance requires that the FPP accounts for the fire risk from potentially combustible waste types stored on the Site.

1.4. The objectives of an FPP are as described in the FPP guidance and are as follows:

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

1.5. Minimum requirements for fire prevention measures are included within the FPP Guidance and relate to each of these three objectives.

1.6. The risk of a significant fire at the Site resulting from the storage of waste is considered to be very low given the low combustibility of uPVC window frames and their inability to ignite or sustain a fire.

Using this FPP

1.7. A copy of this FPP must be kept in the Site office and be readily available to all members of staff. The FPP will be subject to regular review, after a fire has occurred or operational changes have been made on Site that may potentially increase the risk of fire.

1.8. This FPP forms part of the Quality Management System (QMS) for the Site. Procedures and forms referenced within this FPP are included within the QMS. Completed forms (records) will be kept, as required by conditions included in the Environmental Permit.

1.9. The contents of the FPP, including fire prevention measures, will be implemented on the Site through procedures within the QMS. The QMS includes an Environmental Training Checklist that lists all the training requirement for Site staff. This checklist includes the fire prevention procedures. The training undertaken by each member of staff is recorded on their training record as part of the QMS.

1.10. Training on implementing fire prevention procedures will be given to staff on an annual basis by the Site Manager. New members of staff will be given training on the fire prevention procedures during their induction.

1.11. All staff working on Site must understand the contents of this FPP in order to know what to do:

- To prevent a fire occurring.
- During a fire if one breaks out.

1.12. Fire prevention training will be provided to all employees upon employment and on an annual basis thereafter. The operator shall maintain documentation of the training. The training should include for the following:

- Briefing on the FPP, including how it can be accessed,
- Good housekeeping practices,
- Proper response and notification in the event of a fire,
- Instruction on the use of portable fire extinguishers, and
- Recognition of potential fire hazards.

Contents of this FPP

1.13. This FPP describes how PDA Plastics LTD will implement the minimum requirements for fire prevention on their Site, as outlined within the FPP Guidance.

1.14. The location of Site infrastructure, fire prevention measures and storage of materials / waste are shown on Drawing No.1 Site Layout Plan.

1.15. This FPP considers the risk of fire where potentially combustible wastes are stored. The FPP provides information on how PDA Plastics LTD will reduce the risk of an outbreak of fire and the potential impact that a fire may have.

1.16. Below is a breakdown of the information that is included within each Section of this FPP

- Section 4 of this FPP provides information relating to managing fire risk from the storage of potentially combustible waste. This Section addresses self-heating potential resulting in self-combustion. This Section includes information relating to maximum storage duration, waste pile sizes and volumes, separation distances, containment facilities and how heat generated in waste piles will be prevented/ managed.
- Section 5 of this FPP provides information on the systems that are in place to detect a fire, both during and outside of operational hours.
- Section 6 of this FPP provides information on the contingency measures that are to be taken during a fire. This Section includes information relating to the cessation of imported waste and notifying neighbouring businesses.
- Section 7 of this FPP provides information on how a fire will be suppressed and fought. This Section includes information relating to the use of the quarantine area and the use of available water. Steps to be taken in relation to firefighting techniques are addressed for a fire occurring during and outside of operational hours.
- Section 8 of this FPP provides information on the steps to be taken after a fire before the Site becomes operational. This Section includes information relating to managing firewater and contingency measures that are in place to remove any burned materials.

2. Site Information

Site Location

2.1. The Site is located within a Large industrial estate comprising of a mixture of industry usages.

2.2. The Site is located approximately 1800 meters Northeast of the residential town of Strood, Rochester. The Site is accessed via Commissioners Road off of Whitewall Road Strood Rochester Kent.

Hazards

2.3. It is considered that a fire will present three main hazards to nearby receptors: heat from the fire itself, air pollution (predominantly from smoke emissions) and pollution to groundwater / surface water features.

2.4. Heat energy from a fire may reach receptors directly via the spread of a fire or by the deposit of burning embers. Heat energy will be largely dependent upon the location and intensity of the fire. It is considered that burning embers are generally likely to extinguish when travelling over distances that exceed 150 m.

2.5. Smoke produced from fires can contain harmful gases that are produced from the combustion process. The distance smoke will travel will be dependent upon the wind speed at the time of the fire, however it is considered unlikely that smoke will significantly affect receptors outside of a 200-meter radius.

2.6. Significant amounts of water and / or other chemicals may be used when controlling a fire. Firewater produced from tackling a fire has the potential to contain contaminants from the chemicals used, burned materials and other pollutants present on the site. The release of firewater from the Site as a result of a fire has the potential to cause pollution to groundwater / nearby surface water features.

Receptors

2.7. Receptors in the vicinity of the Site are identified on Drawing No. 2 Receptors. A radius of 200 meters from the Site are included on the Receptor Plan.

2.8. Sites of Special Scientific Interest and Marine Conservation Zones are also listed and shown in drawing number 4.

2.9. Table 1 shows the approximate distance and orientation (from the Site) of nearby receptors located within a 200-meter radius of the Site.

Table 1: Receptors

Ref	Receptor	Receptor Type	Bearing from Site	Approx distance to site boundary (M)
1	The Merit Group	Workplace inside & outside. Office furniture storage and installations.	E & S	22
2	E-Vision Electric Vehicles	Workplace in building. Car Hire.	NE	107
3	HE Services (Plant Hire)	Workplace in building. Plant and Machinery hire.	N	192
4	Westwell Developments	Workplace in building. Engineering.	S	154
5	Medway Metals	Workplace in building. Engineering.	SE	128
6	Raydor Signs	Workplace in building. Sign making	S	124
7	Violia	Workplace in building. Household waste facility	NW	254
8	All Saints Church	Church	NE	200
9	Residential Dwellings	Residential Dwellings	SW	156
10	River Medway	Marine conservation Zone, Mudflats, Coastal Salt Marshes and Low land Meadows	SE	380
11	Tower Hill to Cockham Wood	Site of Special Scientific Interest	N	2000

2.10. The Site is bounded by industrial units on 3 sides at the height of approximately 15 meters the remaining site boundary has shipping containers stacked two or three high with a chalk pit cliff face behind. The nearest residential dwelling is located approximately 1800m southeast of the Site. Relatively few residential dwellings are located within 200 meters of the Site.

2.11. The Site is located within a designated industrial area on a redundant chalk pit.

2.12. There is a low level of risk associated with firewater contaminating the surrounding groundwater as the surfacing of the operational areas is impermeable and firewater will be contained within the Site in the event of a fire.

2.13. Air quality for the immediate area is considered to be a receptor. Smoke emitted from a fire can temporarily deteriorate the air quality of the immediate area. The Site is not located within an Air Quality Management Area (AQMA).

Waste Operations

2.14. PDA Plastics LTD import uPVC window frames for recycling. This the only waste type imported onto the Site. The following treatment activities may be carried out:

- Handpicking of contravening waste.
- Shredding.
- Magnetic separation.
- Eddy current separation.
- Optical sorting
- Granulation.
- Pulverisation.

2.15. The treatment of uPVC window frames involves the removal of small volumes of wood, rubber and metal fractions from the window frames. These wastes are sent off Site for recovery / disposal to suitably licensed facilities. The remaining uPVC plastic fraction undergoes further treatment to be made into a fine uPVC powder which is then sent off Site as a product.

2.16. Further information relating to the storage of waste and substances, as it relates to managing fire risks, can be found in Section 4 Managing Fire Risks from the Storage of Waste.

3. Management of Potential Causes of Fire

3.1. It is important to identify potential causes of fire on the Site to minimise these risks and reduce the likelihood of fires, thus addressing Objective 1 of the FPP Guidance; “minimise the likelihood of a fire occurring”. Potential causes of fire, taken from the FPP Guidance, are listed in Table 2 below. Information on how these potential causes of fire apply to the Site are also included in Table 2.

Table 2: Potential Causes of Fire

Potential Causes of Fire	Applicable to the site	Comments
Arson / Vandalism	Yes	There is a low risk of unauthorised access on to the Site. The Site is surrounded by shipping containers and buildings and has a gated entrance. Doors are open during the day. The doors are fully closed after 5pm. There is CCTV in operation 24/7 during non-operational hours.
Malfunctioning / breakdown of mobile plant, equipment or vehicles.	Yes	There is a risk of plant / equipment on the Site malfunctioning and/or breaking down.
Electrical faults (including damaged / exposed cables).	Yes	There is mains electricity located on the Site. The plant used for waste treatment activities is powered by high-voltage electricity
Discarded smoking materials	Yes	There is a risk of discarded smoking materials presenting a source of ignition. A designated smoking area is in use on the site.
Hot works undertaken for maintenance	Yes	Hot works are undertaken on site by suitably trained staff and firefighting and prevention equipment is kept close to the work area.
Industrial heaters, furnaces, incinerators or any other naked flames.	No	No industrial heaters, furnaces, incinerators, or any other naked flames will be present on the Site.

Hot exhausts on mobile plant, equipment or vehicles.	Yes	There is a risk of exhausts of plant and equipment remaining 'hot' after use. All plant is shut down a minimum of 30 minutes prior to shift end and manually monitored to ensure there is no overheating or fire as a result
Batteries in End of Life Vehicles.	No	End of Life Vehicles are not imported on to the Site
Fuel stored on the Site.	Yes	Fuel is stored on the Site. There is a risk that fuel or gas could present a fire risk or source of ignition.
Leaks and spills from site vehicles.	Yes	Vehicles will be used on the Site to import/export waste loads. There is a risk of one of these vehicles leaking fuel or oil.
Leaks and spills from End of Life Vehicles	No	End of Life Vehicles are not imported on to the Site
Build-up of loose combustible waste, dust and fluff	Yes	There is a risk of loose combustible waste, dust and fluff building up within storage areas of combustible waste. uPVC waste accepted onto the Site does not typically include significant inclusions of contravening combustible materials.
Reactions between wastes	No	There are no waste types accepted on to the Site that, when mixed, would create a reaction e.g. an explosion. Waste Acceptance Procedures within the QMS will ensure that only permitted waste types are accepted on to the Site. Waste Acceptance Procedures will include: • The List of Waste codes from the Environmental Permit. • Instructions to visually check loads upon reception, acceptance and unloading.
Deposited hot loads.	No	'Hot loads' are not accepted at the Site
Self-heating resulting in self-combustion.	Yes	There is a very low risk of self-heating within piles of combustible waste stored on the Site.
Operations carried out by neighbouring businesses.	No	Neighbouring businesses include a Furniture storage facility. Plant & machinery hire facility and a Household recycling facility.

3.2. The remainder of the points in this Section describe in detail how PDA Plastics LTD will minimise the risks associated with the potential causes of fire that relate to this Site, as identified in Table 2 above.

Site Security

3.3. Site security is important to reduce the likelihood of unauthorised access to the Site. The site boundary on two sides has shipping containers stacked two or three high. The site is not readily accessible by the public and is accessed via a gate which is locked and secured during non-operational hours.

3.4. The Site is manned during operational hours. The Site is monitored by CCTV cameras during non-operational hours. The CCTV can be viewed at any time by directors and maintenance via electronic devices e.g. mobile phone. The installed CCTV system covers all areas of the permitted area.

Plant, Equipment and Vehicles

3.5. Plant, equipment and vehicles are used on the Site. Plant and equipment include machinery for the movement and treatment of waste on the Site. Vehicles are used to import and remove waste to and from the Site.

3.6. Mobile plant / equipment that is not being used will be stored at least 6 m away from combustible waste types and combustible materials.

3.7. Plant and equipment have the potential to malfunction / breakdown. In some instances, this could cause a fire, which in turn could spread to combustible waste stored on the Site. Plant and equipment will be maintained in line with manufacturers recommendations to reduce the risk of breakdown / malfunction. Plant and equipment will be checked for

malfunctions daily. Any fault will be noted on the daily Inspection and rectified as soon as possible.

3.8. Dust or particles settling on hot exhausts / engines can cause fires. Shredding plant will be shut down at least 30 minutes prior to the end of the shift. An inspection is carried out at the end of the day / shift to ensure the plant / vehicles are cool and to remove any dust build-ups. This inspection will ensure that the plant is monitored for a minimum of 15 minutes after shutdown to ensure it has cooled.

3.9. A Dust Collection System is used for the granulation, pulverisation and mechanical sorting operations. The Dust Collection System is used to remove dust particles from the treatment process using a cyclone system. This reduces the generation of dust emissions from these activities. Dust is captured inside 'socks'. The 'socks' are visually inspected continuously through the day and emptied into a separate bin for subsequent off-Site removal.

3.10. The 'dustier' granulation processes are carried out in a separate part of the building to the waste reception and shredding activities. This minimises the area over which dust can accumulate and is required to be cleared. Regular clearing of dust from the granulation area occurs throughout the day.

3.11. There is a potential for vehicles entering the Site to leak fuels and oils. Vehicles entering the Site will be owned by PDA Plastics LTD or their customers. Vehicles owned by PDA Plastics LTD will be maintained in line with manufacturers recommendations to reduce the risk of breakdown / malfunction, which will include any corrosion, cracks or leaks in any fuel/oil tanks. Spills kits will be used in the event of a spill or leak from PDA Plastics LTD vehicles and any other vehicles on Site.

Ignition Sources

3.12. A restricted smoking policy is enforced within the permit boundary to reduce the likelihood of any naked flames. Smoking is only permitted in the designated smoking area.

3.13. No other naked flames, including incinerators, industrial heaters, space heaters, furnaces, are present on the Site.

3.14. The storage of flammable liquids is considered as an ignition source. Fuel is stored on the Site. There is a risk of fuel leaking / spilling during refuelling of vehicles / mobile plant on the Site. Spill kits are available on the Site and will be made available during refuelling. The condition / integrity of the fuel tank will be checked using Appendices 2 Site Inspection Checklists.

3.15. Oil and fuel storage at the Site will comply with the Oil Storage Regulations for Businesses (last updated 3rd January 2018). Fuel is stored in a bunded tank in accordance with the Oil Storage Regulations. Drawing No.1 Site Layout Plan shows the location of the fuel storage.

3.16. All ignition sources present on the Site will be kept at least 6 m away from combustible waste types.

Electricity

3.17. Electricity is used on the Site to power the waste processing plant. All electrical equipment used in the waste processing operations is shut down for a minimum of 30 minutes prior to site operatives vacating the building at the end of each working day. This ensures there is a minimal risk of the equipment overheating and maximises the opportunity to identify any overheating.

3.18. Damaged or exposed electrical cables and fittings have the potential to give off excess heat / create sparks. Power sockets can be overloaded which may result in the overheating of these sockets and wires.

3.19. Electrical equipment within the processing plant will be certified by a qualified electrician. All equipment used in the waste operations is checked on a daily basis and any faults are logged on the pre-use check boxes on the production sheets. The Maintenance teams are informed if any faults ar found QMS. The regime ensures that any old or loose wires

or connections are replaced as soon as possible and are appropriately protected from mobile plant/process activity where necessary.

3.20. Inspections of electrics, including wiring and equipment, are carried out by Site staff, on a regular basis to ensure that cables are in a good condition and sockets are not overloaded.

Build-Up Of Loose Combustible Waste

3.21. Combustible residues collecting around waste storage areas can present a fire risk. It is considered that:

- The risk of combustible wastes building up in the waste reception area is low due to the nature of the wastes accepted (uPVC window frames only). Combustible contravening wastes are stored in small quantities within containers in this area.
- The risk of combustible wastes building up in the waste processing areas is low due to the absence of combustible waste in these areas. Processed material (uPVC) has a very low potential for combustion due to a very high flash point. In addition, the granulation area is cleared of loose materials and dust multiple times per day.

3.22. Storage areas and containers will be inspected on a daily basis. When emptied, the storage area or container will be cleaned to remove any residual waste / dust / fluff.

3.23. Checks will be made to ensure that all storage areas are cleared to ensure that the maximum storage durations for the waste are not exceeded.

Self-Heating Resulting in Self-Combustion

3.24. The risk of self-heating occurring within waste piles is influenced by the following:

- Waste type.
- Particle size.
- Storage time.
- Volume of stockpile.
- Ambient temperature / external conditions (including heat produced from waste operations).

3.25. Self-heating is a potential cause of fire, as it may lead to self-combustion. However, the risk of fire from self-heating within waste piles is not considered to be a factor due to the nature of the waste that will be accepted and stored on Site.

3.26. The uPVC window frames accepted on to the Site will not contain degradable materials, the decomposition of which typically leads to self-heating.

Neighbouring Businesses

3.27. The Site is located within an industrial estate with neighbouring businesses. The very low combustibility of uPVC ensures that it is a low risk of fire spreading to / from neighbouring businesses. Furthermore, the waste operations at PDA Plastics LTD are carried out away neighbouring buildings.

4. Managing Fire Risks From the Storage of Waste

Storage of Waste

4.1. The type of waste accepted and treated on the Site i.e. UPVC window frames is considered to have low combustion potential and not prone to self-combustion. This waste does not contain organic materials for composting type or other ‘self-heating’ reactions to occur which can then potentially lead to ignition and possible fires. Any

contravening wastes such as non-PVC plastics, wood and metal etc are handpicked from waste upon arrival at the Site and stored in a skip.

4.2. The maximum storage time for combustible waste suggested in the FPP Guidance is 6 months. The maximum storage time for combustible waste stored on the Site is 1 month.

4.3. The uPVC window frames are processed in accordance with the Environment Agency's 'Non-packaging plastics: quality protocol' to 'BS EN 15346:2007 Characterisation of poly (vinyl chloride) (PVC) recyclates'. Once processed to the appropriate standard, the uPVC powder is considered a product and no longer a waste and is therefore not subject to the maximum storage times included within the FPP Guidance.

Stock Rotation Policy

4.4. Stockpiles of potentially combustible material will be managed to ensure that the risk of self-combustion is minimised.

4.5. Waste storage areas are inspected throughout the day by operational staff.

4.6. It is considered that there is a low risk of self-heating within waste piles. Self-heating is not considered to be a factor due to the nature of the waste that will be accepted and stored on Site. Incoming waste will be processed in order of receipt. Waste's will not be stored for longer than the maximum storage times included in Table 3. The metal fraction included within the uPVC window frames is removed and placed into a separate Bay or container. Based on site processes, this container is stored for a maximum of 14 days. This is considered to minimise to a large extent any risk of fire as a result of storage of metals.

4.7. Based on the site's processes, waste containers containing contravening waste (other than metal) will be stored for a maximum of 7 days. This is considered to be good practice and also means the risk of self-combustion from this contravening waste container is minimised in so far as is reasonably practicable.

Pile Dimension, Volumes and Separation Distances

4.8. The recommendations within the FPP Guidance in relation to stockpile sizes are met by the proposed waste storage on this Site. Stockpile volumes of waste stored on the Site are significantly lower than the recommendations included within the FPP Guidance.

4.9. Storage areas are clearly identified by type of waste on Drawing No.1 Site Layout Plan. Table 3 below summarises storage area sizes and maximum individual pile sizes, the volume for each waste type and the maximum storage times. Storage area sizes are shown on the Site Layout Plan.

4.10. The minimum separation distance for combustible waste stockpiles stored on the Site is 6 metres.

Particle Size

4.11. The uPVC window frames are initially shredded down into smaller particle sizes (150mm) which also produces a smaller metal fraction. The potential for self-heating within the uPVC waste and metal waste is considered to be very low given the negligible risk of self-heating due to the high flash points of the material (uPVC and metal), absence of organic materials and the short maximum storage time i.e. 2 weeks.

Storage Area Ref	Storage Area Contents	Storage Facility	Storage Area Size W/D/H (M)	Maximum Volume	Maximum Storage Time
1	Incoming waste reception area UPVC window frames A grade	Bay	13.0 X 10.4 X 5.1	680 M^3	1 Week
2	Incoming waste reception area UPVC window frames B grade	Bay	12.0 X 10.4 X 5.1	640 M^3	1 Week
3	Shredded UPVC window frames	Bay	9.0 X 8.6 X 5.1	390 M^3	1 Week
4	UPVC window frame offcuts	Bay	9.0 X 8.6 X 3.0	232 M^3	1 Week
5	Frag steel	Bay	4.0 X 6.4 X 3.0	110 M^3	2 weeks
6	Frag Aluminium	Skip roll-on-roll off	2.4 X 5.7 X 1.8	25 M^3	1 Month
7	Glass from UPVC windows	Yard skip	2.4 X 4.5 X 1.1	15 M^3	3 Months
8	General waste	Skip roll-on-roll-off	2.4 X 5.7 X 2.4	32 m^3	1 Week
9	Pulverised UPVC powders	1 Tonne individual sealed bags	1.0 X 1.0 X 1.8	2 M^3	1 Month
10	Coloured Jazz UPVC regrind	1 Tonne individual sealed bags	1.0 X 1.0 X 1.8	2 M^3	1 Month
11	White UPVC regrind	1 Tonne individual sealed bags	1.0 X 1.0 X 1.8	2 M^3	1 Month

Table 3: Storage Area Details

Storage Bays Skips & Containers

4.12. Waste is either stored in storage bays or skips and containers, see Drawing No.1 Site Layout Plan.

4.13. The waste storage bay for the shredded uPVC is constructed from moulded interlocking concrete Legio Blocks which provides a thermal barrier - confirmed to have a fire resistance period of at least 120 minutes. Concrete fulfils the requirements of class A1 fire resistance because its mineral constituents are affectively non-combustible.

4.14. An appropriate ‘freeboard’ space of at least 0.5 m will be maintained within the storage bays to prevent fire spreading over the walls. A 0.5 m freeboard is considered adequate due to the nature of the waste stored within the bays and the consequent low fire risk.

4.15. Stock rotation and temperature monitoring is not considered necessary due to the type of waste stored within the bays i.e. waste is not prone to self-combustion and the short storage duration (i.e. 1 week).

4.16. If safe to do so, mobile plant will be used to quickly transfer waste from the storage bays to the fire quarantine area in the event of a fire.

4.17. Contravening waste handpicked from the incoming loads is stored in skips/containers located on the Site, see Drawing No.1 Site Layout Plan.

4.18. Skips/containers are accessible by mobile plant and firefighting equipment to allow for a fire inside the skip, to be put out. Skips are roll-on, roll-off and will therefore be easily removed in the event of a fire by the mobile plant / vehicles present on the Site. Quick removal of these skips will help to prevent fire spreading.

4.19. If safe to do so, in the event of a fire within a skip, mobile plant will be used to remove combustible waste from the vicinity of the fire, to minimise the likelihood of a fire spreading. Combustible waste will be transported to an area of the Site which is at least 6 m away from any other combustible waste. Mobile plant will be used to remove burned waste from the vicinity of the fire, to minimise the likelihood of a fire spreading as burned waste may reignite. Burned waste will be transported to the Fire Quarantine Area.

Risk to Surface & Groundwater

4.20. Waste is stored and treated on impermeable surfacing within a building. It is not the operator's intention to use water as a fire suppression measure due to the high voltage waste processing equipment located within the building. Fire extinguishers (carbon dioxide for electrical fire and foam for fuel-based fire) will be used in the event of a fire on the Site and the resulting residues will be removed to a suitably licensed facility. Therefore, the risk to surface and groundwater is considered to be very low.

4.21. The potential for a fire to occur such that the emergency services are deployed to the Site is also considered to be very low and thus presents a low risk to surface and groundwater.

Seasonal Variations

4.22. It is not anticipated that there will be a significant seasonal variation in demand or supply of the waste accepted on to the Site.

4.23. Similarly changing outside temperatures e.g. in summer is unlikely to pose a risk of overheating of the waste types stored on Site.

Managing Temperatures within Waste Piles

4.24. The waste types stored on the Site i.e. UPVC windows contain persistent organic pollutants (POPs). uPVC windows (whole, shredded, granulated and pulverised) are stored separately to other wastes (metal fraction and contravening waste) stored on the Site.

4.25. In the event of a fire, the fire service will be informed that there are wastes containing POPs on the Site.

5. Detecting a Fire

Detection of a fire Outside Operational Hours

5.1. The Site is monitored by CCTV cameras. The installed CCTV system covers all areas of the permitted area including the waste / product storage areas. The CCTV can be viewed at any time by directors via electronic devices e.g. mobile phone.

5.2. The Site is manned during operational hours. The 24/7 CCTV system helps ensure early detection of fires and detect fires outside of operational hours.

5.3. The Site Manager / Director immediately upon discovery of a fire, will contact the Emergency Services.

5.4. If the Director or Site Manager are both unavailable, then a member of the Maintenance staff will be allocated the responsibility.

5.5. Kent Fire and Rescue Service respond to fires within 13 minutes, 80% of the time. Therefore, it is considered that the fire service will arrive at the Site within 20 minutes from when they are alerted of a fire.

5.6. In the event that the Director (or other senior management) is the first responder, they will attempt to suppress the fire before the Emergency Services arrive if it is safe to do so. Information relating to active firefighting measures are included in Section 7 Suppressing a Fire and Firefighting Techniques.

Detection of a Fire During Operational Hours

5.7. All members of staff are trained to be vigilant to the signs of fire and to report any incidents to site management. Staff members will sound the fire alarm to ensure all members of staff are aware of the fire.

5.8. The emergency services will be informed immediately, by the operator, if there is any evidence / suspicion of a fire on the Site.

5.9. The fire watch, during operational hours, is undertaken by site personnel, daily. Visual inspections are carried out throughout the working day to check for fires / potential causes of fire. Staff are working to sort / separate the waste throughout the day and will therefore be able to quickly identify any signs that the waste is heating up, producing smoke, or showing any other signs of a fire. Staff are trained on how to identify a fire and what to do in the event of a fire.

6. Contingency Measures During a Fire

6.1. PDA Plastics LTD will implement fire contingency plans via procedures contained within the QMS.

6.2. PDA Plastics LTD can quickly cease waste imports in the event of a fire. Vehicles used to import waste on to the Site are operated by PDA Plastics LTD and customers. All Site staff will be instructed to cease the importation of waste in the event of a fire.

6.3. During an event there will be no deliveries or export activity from the site, with such operations only allowed once all decontamination activities have been completed to a satisfactory standard. All customers who wish to deliver wastes during a fire will be notified by site admin staff and any who arrive without prior notification will be turned away. If urgent, deliveries will be directed to an alternative waste facility.

6.4. Nearby residents will be contacted in the event of a fire. Contact details for these contacts are included on the Key Contacts Form within the QMS. In the event of a fire, all staff will inform others of the fire by activating the fire alarm.

6.5. In case of circumstances where maximum waste storage times are likely to be exceeded then stockpiles of combustible waste metal will be frequently inspected for any signs that the waste is heating up, producing smoke or showing any other signs of a fire.

7. Suppressing a Fire and Firefighting Techniques

Use of the Quarantine Area

7.1. PDA Plastics LTD have the ability to make an area available as a Fire Quarantine Area that accords with the FPP Guidance requirements. The Fire Quarantine Area may be used for storing materials to prevent the spread of fire or to isolate materials that are likely to re-ignite or have been burned. This will aid in the overall suppression of a fire. The Fire Quarantine Area will be made available so that it can be used in the event of a fire.

7.2. The Fire Quarantine Area has sufficient separation distances (minimum of 6 m) from any sources of ignition or building / perimeter boundary. The Fire Quarantine Area will be able

to store approximately 100 m3 of waste which is 50% of the volume of the largest stockpile of combustible waste stored on the Site.

7.3. The Fire Quarantine Area will not be located within 6 m of combustible waste, flammable materials e.g. fuel, or any sources of ignition.

7.4. The Fire Quarantine Area will allow for faster active firefighting with regard to the removal of burning or burned material.

Use of Suppression Systems

7.5. The waste types stored are considered to have very low combustion potential. An automated fire suppression system (using water) cannot be installed due to the high voltage waste processing equipment located within the building. Therefore, Foam and CO2 fire extinguishers must be used in the event of a fire, which are considered appropriate for the type/volume of waste and equipment stored on Site.

7.6. Site operators monitor for any signs of fire during operational. Furthermore, CCTV monitors are located on site to help ensure early detection of fires within operational and non-operational hours.

7.7. Where wastes are stored indoors it is considered that the alternative measures in place on the Site are appropriate in ensuring the three objectives of the FPP guidance are met without the need for an automated suppression system. These alternative measures are:

- Site operatives monitor for any signs of fire during operational hours All site staff (Operators) are trained on the use of fire extinguishers. This allows any fires to be quickly detected and ensures appropriate suppression is taken to reduce the spread of a fire.
- All waste types stored indoors are stored within segregated storage areas and are not prone to self-combustion.
- The indoor waste storage areas are significantly lower than the storage limits included in the FPP Guidance and it is therefore considered that a fire could be quickly suppressed.
- The building has roller shutter doors with a number of access points that can be utilised to easily remove waste from inside the buildings. All indoor waste storage areas can be accessed for firefighting.

Fire Suppression Techniques

7.8. The Site has access to mains water. However, the use of water for fire suppression must not be used on the Site due to the health and safety risk involved with the high voltage waste processing equipment located within the building. Foam and CO2 fire extinguishers must be used in the event of a fire involving waste / fuel and waste processing plant respectively.

7.9. All site staff (Operators) are trained on the use of fire extinguishers. There are 20 fire extinguishers located on the Site.

Fire Fighting Techniques Outside of Operational Hours

7.10. Once a fire is detected, the emergency services will be contacted immediately by the Director or site Manager.

7.11. If the director or site manager are both unavailable, then the Maintenance team will contact other members of the company to inform them of a fire at the Site.

7.12. Generally, the steps described in the section below on ‘Firefighting Techniques - Within Operational Hours’ would be implemented in the likely event that the Operator arrives on the Site prior to the emergency services.

7.13. Kent Fire & Rescue Service will enter the Site through force if they arrive at the Site before a key holder is present.

Firefighting Techniques During Operational Hours

7.14. PDA Plastics LTD implement the following suppression and firefighting measures to minimise the impact of a fire:

- The emergency services will be contacted if they have not been already.
- Neighbouring residents and key contacts) will be contacted.
- If safe to do so, fire extinguishers will be used to tackle any small fire on the Site, the location of the fire extinguishers is shown on Drawing No. 1 Site Layout Plan.
- If safe to do so, mobile plant will be used to remove combustible waste from the vicinity of the fire, to minimise the likelihood of a fire spreading.
- If safe to do so, mobile plant will be used to remove burned waste from the vicinity of the fire, to minimise the likelihood of a fire spreading as burned waste may reignite. Burned waste will be transported to the Fire Quarantine Area.
- The Site Manager will liaise with the emergency services upon arrival to inform them of the locations of combustible materials and the active firefighting actions taken up to this point e.g. any chance of reignition of burned waste.

7.15. Fire Procedures within the QMS will implement the requirements of this FPP on the Site. These procedures form the basis for training and shall be followed in the event of a fire.

8. Recovery After a Fire

Contingency Measures Managing Burning Materials

8.1. In general, there is a chance that waste re-ignites after it has been extinguished. Burned waste will be monitored following a fire to identify any signs that the waste is re-igniting and to ensure that the waste is completely extinguished. Combustible waste may be removed from the location of the fire to the Fire Quarantine Area if necessary. Movement of burned waste may minimise the risk of the fire spreading.

8.2. Ash and partially burned materials resulting from a fire will be contained and then removed from the Site. Residues from a fire on the Site are likely to contain POPs. These residues will be removed from the Site in accordance with The POPs Regulations 2019. 8.3. Due to the type of waste to be stored on Site, there is considered to be low potential for ash formation or re-ignition of waste at the Site.

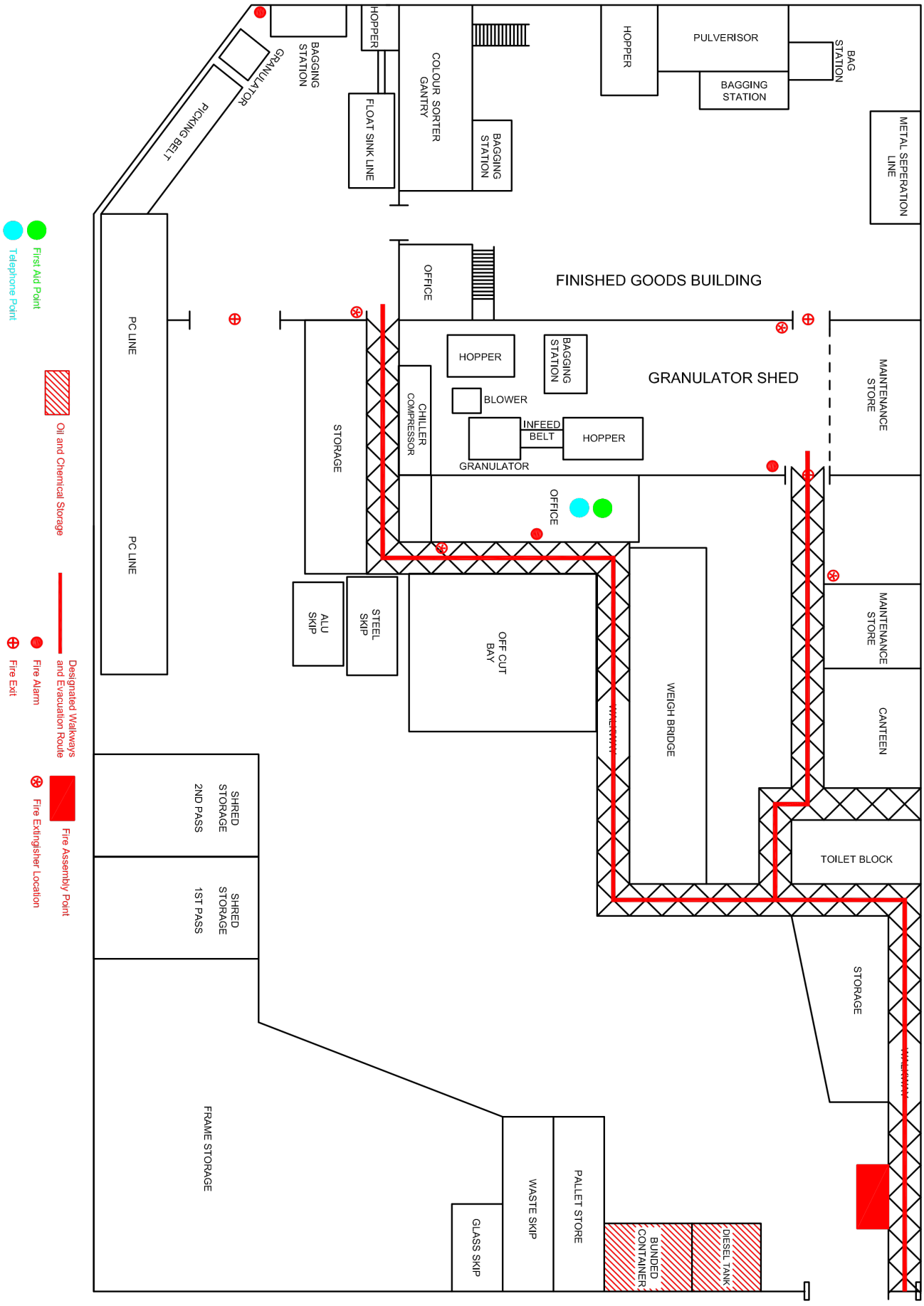
8.3. Any residual contamination from the burned materials and fire extinguishers will be cleaned appropriately and the contents will be removed from the Site to a suitably licensed facility in accordance with The POPs Regulations 2019. 8.5. The importation of waste will resume as soon as the risk of further fires has been considered and the Site is determined to be safe.

Steps to Becoming Operational

8.4. Following a fire, PDA Plastics LTD will employ the following steps before accepting waste and becoming operational:

- All burned materials and residues will be removed to a suitably licensed facility.
- Following any environmental incident on the Site including fires, details of the event will be recorded in the site diary and on an Accident / Incident form. Completion of the form will enable all the details of the fire to be recorded including sequence of events, causation, size and extent of fire, damage sustained (internally and externally), recording of the investigation and actions taken.

Drawing 1 **Site Layout Plan**

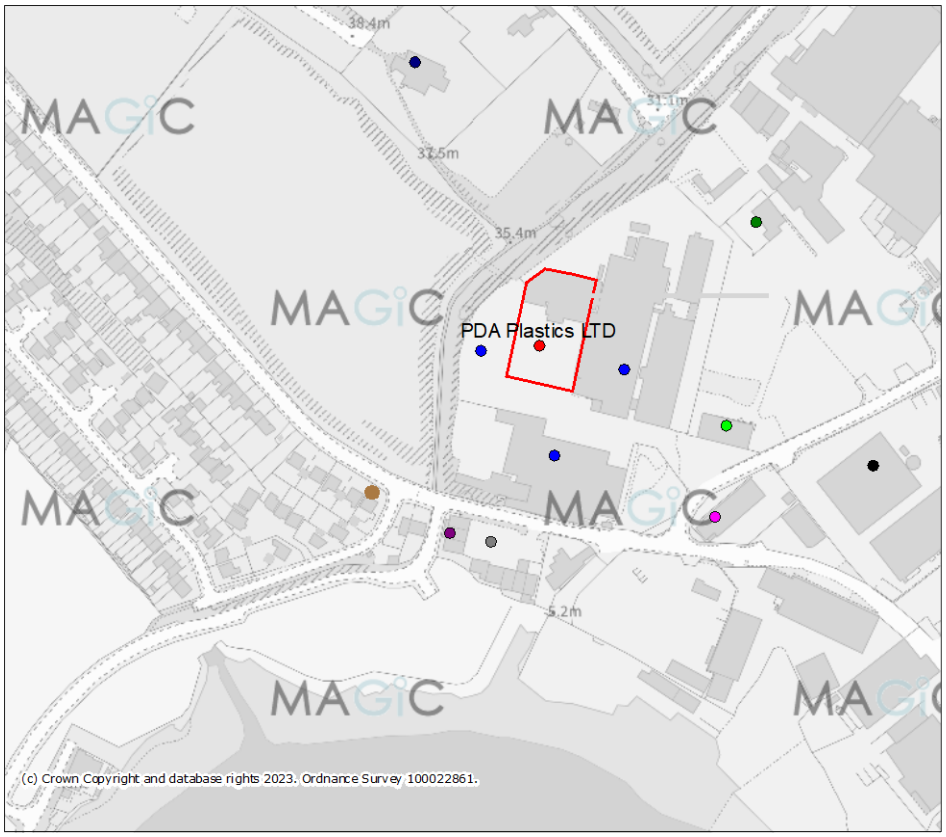


Drawing 2 **Receptors Map**

MAGIC

PDA Plastics LTD ME2 4EB

Drawing 1



Receptors

Receptors Key:

PDA Plastics LTD
Merret Office Installations
E-Vision Electric Cars
H E Services Plant Hire
Westwell Developments
Medway Metals
Raydor signs
Violia
Residential Dwellings
All Saints Church

Projection = OSGB36
xmin = 573900
ymin = 169200
xmax = 575000
ymax = 169900
0 0.055 0.11
km

Map produced by MAGIC on 24 April, 2023.
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Drawing 3 **Site Drainage Map**

Drawing 4 Habitats & Species Map

- Green shaded area site of Special Scientific interest (SSSI Tower Hill to Cockham Wood) .
- Brown priority Habitat Inventory mudflats.
- Green Priority Habitat Inventory Coastal Salt Marshes & low land meadows.
- Blue river Medway Marine plan area.

WORKS VEHICLE DAILY WALK ROUND CHECK

No. 03

Vehicle Reference No 0540-10005
Vehicle Type 525D
Date 28/04/2023
Hours/Kms 5424
Driver Rob.

DRIVER'S VEHICLE CHECK – ITEMS TO BE CHECKED BY DRIVER BEFORE AND DURING DRIVING ✓ = SATISFACTORY × = DEFECT

✓ LAMPS – OPERATION-CLEANLINESS	✓ TYRES AND WHEELS – CONDITION-SECURITY-PRESSURE	✓ FORKS, ATTACHMENTS, LOCKPINS – CONDITION-SEC
× MIRRORS – CONDITION-SECURITY	✓ CAB / BODY / SAFETY FRAME – LEVELS-LEAKS	✓ MAST / CHAIN – OPERATION- CONDITION-LEAKS
✓ HORN AND OTHER WARNINGS – OPERATION	✓ ENGINE OIL, COOLANT, FUEL – LEVELS-LEAKS	✓ CARRIAGE AND GUARDS – OPERATION-SECURITY
✓ FOOT BRAKE – OPERATION-FLUID-LEAKS	✓ TRANSMISSION – OPERATION- CONDITION-OIL LEVEL	WINDSCREEN WIPERS AND WASHERS – CONDITION-O
✓ PARK BRAKE / EMERGENCY BRAKE – OPERATION	✓ HYDRAULICS – OPERATION-CONDITION-OIL LEVEL	✓ ELECTRICAL CONNECTIONS AND SWITCHES – OPE
✓ STEERING – OPERATION-FREE PLAY	✓ BATTERY – CONDITION-LEVELS	✓ SEATS,SEAT BELTS – CONDITION-OPERATION
✓ DRIVING CONTROLS – OPERATION-CONDITION	✓ EQUIPMENT CONTROLS – OPERATION-MARKING	✓ RATING PLATE – DETAILS-SECURITY

ALL FAULTS NOTED DURING ABOVE CHECK OR DURING SHIFT SHOULD BE REPORTED BELOW AND IMMEDIATELY TO SUPERVISO

DEFECT REPORTED 1 × Mirror Missing
Seat worn

DRIVER'S NAME Rob Pratt
DRIVER'S SIGNATURE

DEFECTS RECTIFIED

COMPLETED BY NAME
SIGNATURE
DATE RECTIFIED

Re-Order Code: VEH 036

Site Daily inspection Sheet

PDA Plastics LTD
Site Daily Visual Check Sheet

Item for visual Inspection:	Visual Inspection Requirement:	Checked by: AM / PM		Action Required:
Litter	Check walkways are clear of litter. Check if the Yard and outside storage areas are clear of litter. Check production buildings and office areas are clear of litter and bins have been emptied.			
Fire	Check yard area and stockpiles. Check buildings fire exits are clear. Check fire extinguishers are in place and are not damaged.			
Fuel and Oil Storage	Visually check bunded storage for leakage. Check fuel and oil is stored correctly. Check spill kits are in place.			
Dust Emissions & Dust Collection Systems	Check dust socks for leakage. Check plant and equipment is not generating excessive dust.			
Plant & Equipment	Check Pre-shift start up checks have been completed. Check MHE Pre-use checks have been completed.			
Weather	Check weather conditions. Adverse weather conditions may require extra measures to be put into place.			