RGE Recycling Limited

PERMIT NO: Bespoke Permit Application

SITE ADDRESS: Royal Eagle Close, Rochester, ME2 4NF

DOCUMENT REFERENCE NO: FPP-RGE-V1

PREPARED FOR: RGE Recycling Ltd

DATE:

FIRE PREVENTION PLAN

Version 1.0

SETTING OUT REPORT

This Fire Prevention Plan document has been prepared by Enviroawards Limited on behalf of RGE Recycling (the Client) for the preparation and submission for a Bespoke Environmental Permit in support for the legal operation of a A20 - Metal recycling site (MRS). A high level of skill, care, attention, and diligence, taking account of the timescales and resources devoted to it by agreement with RGE Recycling as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

Information reported herein may be based on the interpretation of public domain data collected by Enviroawards and/or information supplied by the Client and/or its other advisors and associates. All information and data have been accepted in good faith as being accurate and valid.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations, and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment

Title	Document Reference	Version	Valid from
Fire Prevention Plan	RGE-FPP-V1	1.0	EA Approval

Fire Prevention Plan

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1. Fire Prevention Objectives

Sites that store combustible wastes are at risk from fires on sites. These events can pose an environmental risk to receptors off site, both from the smoke plume from the fire and from the firewater runoff created by any firefighting activities. Sites storing combustible materials such as paper, plastics, cardboard and scrap metal are required to have in place a fire prevention plan that follows the standards prescribed in the Environment Agency's (EA) guidance documents – updated 11th January 2021

This fire prevention plan has been designed to meet the following 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.

This is a working document and will be reviewed and updated, in consultation with the Environment Agency (EA) on at least an annual basis, or immediately after an incident or a change to operations.

2. Who This Guidance Applies to

The EA's Fire Prevention guidance applies to this site as the operator stores combustible waste; the combustible wastes include non-hazardous waste and waste metals as detailed within this document.

3. Who This Guidance Does not Apply to

The Environment Agency guidance document does not apply to materials or waste that are; flammable; combustible liquids or gasses; certain types of hazardous; or dangerous substances stored under the Control of Major Accident Hazards Regulations. The guidance states that these materials should still be considered within the fire prevention plan because of their potential to increase the impact of fire on site. Therefore, the following materials are considered within this plan:

Type	Storage Location	Storage Features
DERV	Diesel Tank See site plan (appendix 1)	4500L LLDPE Bunded Diesel Tank. Tank is double skinned and capable of containing at least 110% of the volume of the tank
Maintenance Fluids/ Hydraulic Oil/ Engine Oil	COSHH 2 See site plan (appendix 1)	4 x 1000 litre IBC's

It is unlikely that non-permitted waste will be accepted into the facility and present an increase in fire risk.

4. Types of Combustible Waste

The types of combustible waste stored on site are limited to:

- **02 01 10** — Waste metal
- **12 01 01** — Ferrous metal filings and turnings
- **12 01 03** — Non-ferrous metal filings and turnings
- **15 01 04** — Metallic packaging
- **16 01 17** — Ferrous metal
- **16 01 18** — Non-ferrous metal
- **16 01 21*** — Hazardous components – catalytic converters containing RCF matting
- **16 01 22** — Vehicle catalytic converters
- **16 06 01*** — Lead batteries
- **17 04 01** — Copper, bronze, brass
- **17 04 02** — Aluminium
- **17 04 03** — Lead
- **17 04 04** — Zinc
- **17 04 05** — Iron and steel
- **17 04 06** — Tin
- **17 04 07** — Mixed metals
- **17 04 11** — Cables other than those mentioned in 17 04 10
- **17 09 04** – (UPVC Windows only)
- **19 01 02** — Ferrous metals removed from bottom ash
- **19 10 01** — Iron and steel waste
- **19 10 02** — Non-ferrous waste
- **19 12 02** — Ferrous metal

- **19 12 03** — Non-ferrous metal
- **19 12 04** – Plastic and rubber
- **20 01 33*** — Lead batteries
- **20 01 40** — Metal

The location and dimensions of the combustible wastes stockpiles are presented within the waste table (Appendix 4)

5. Using the Fire Prevention Plan

This fire prevention plan forms part of the Operator's Environmental Management System. This fire prevention plan is a standalone document – it contains all relevant information, site plans and information to be used in a time of emergency. A copy of the fire prevention plan is stored within the site office. It is stored in a clearly marked Red Folder, the site file is marked 'FIRE PREVENTION PLAN AND EMERGENCY ACTIONS'.

All site staff will be able to access the site file at all times, including during an incident. All staff and contractors working on site will be instructed on the content of the fire prevention plan and what to do prevent a fire occurring, including what to do during a fire if one Occurs.

All staff will receive training on the fire prevention plan. The Company will undertake regular exercises to test how well the plan works and they will make sure that key staff understand how to respond.

Table (1) below outlines the schedules that will be carried out on site:

All new site staff and contractors (and existing site staff and contractors when the plan is introduced on site)	To be trained on the fire prevention plan and emergency actions during site induction
Existing site staff and contractors	To be trained on the fire prevention plan and emergency actions every 12 months (on the nearest practicable date to the 1st of the month)
Site Managers to carry out a fire drill and test the fire prevention plan and emergency actions	Every 12 months (or the nearest practicable date to the 1st of the month)

Site TCM and Site Manager	Annual review each year, or earlier if in a response to an incident or change in operational procedures

In addition, The following individuals are trained as Fire Marshals:

- Mark Tarry
- Nicolas Stone
- Ryan Eastwood

There is always at least one Fire Marshal present on site during operational hours, and the site operates with a ratio of two fire trained site operatives per Fire Marshal. The procedures for fires discovered on site are provided both in RGE Recycling Fire Prevention Plan (FPP), Environmental Management System (EMS) and on-site notice boards. Fire training program appendix 8

All employees will receive adequate fire safety training and all fire safety training sessions will be delivered by a competent person. There will be at least one fire drill annually to test the fire safety training with the following topics being covered:

- The significant findings from the fire risk assessment and fire safety policies.
- The significant findings from the Fire Prevention Plan.
- What to do on discovering a fire.
- How to raise the alarm, including the locations of fire alarm call points.
- The action to take upon hearing the fire alarm.
- The evacuation procedure for alerting guests, residents and visitors including, where appropriate, directing them to exits and assembly points at a place of safety.
- The arrangements for calling the fire and rescue service.
- The location and the correct use of portable fire extinguishers and fire-fighting equipment.
- Knowledge of escape routes including stairways and especially those not in regular use.
- How to open all emergency exit doors.
- The importance of fire doors, keeping them closed and not wedged open to prevent the spread of smoke and heat, keeping escape routes unobstructed.
- Where appropriate, isolating electrical power and gas supplies and stopping machines and processes.
- The safe use of and risks from storing and working with highly flammable and explosive substances.
- General fire precautions, fire awareness and good house-keeping practices.
- The no smoking policy.
- Special provisions for assisting disabled people and any training needed.
- Identifying fire hazards and fire incidents reporting procedures.
- Equipment fault reporting procedures.
- Deployment of the interceptor balloon

Fire Safety Training Records All fire safety training will be recorded to include the date of instruction; the duration, the name of the person giving the instruction, names of persons receiving the instruction; and the nature of the instruction and/or, drill. As mentioned previously there is always at least one Fire Marshal present on site during operational hours.

6. Fire Prevention Plan Contents

This Fire Prevention Plan ensures that RGE Recycling will do all that is reasonable to prevent fires on site. The plan forms part of the broader written management system and includes an assessment of the sites fire risk and the measures in place to prevent, detect, suppress, mitigate and contain fires. The Fire plan will be intrinsically linked to the sites operations and will provide the most robust set of actions required to protect from all reasonably foreseeable fire risks.

7. Site Activities

The activities that can be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- R4: Recycling/reclamation of metals and metal compounds (all metals in RGE Recycling operations are non-ferrous);
- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

Activities on site currently consist of the receipt, unloading, manual sorting, storage, shearing, and bailing of ferrous non-ferrous metal wastes for recovery. The site also accepts UPVC for storage and transfer only – No treatment. In practice, sorting does not take place often as all waste types received is clearly documented, and visually identifiable which allows it to be directed easily to the appropriate part of the site (the relevant bay that is currently housing that waste metal type). Sorting will only occur to separate ferrous and non-ferrous metals from mixed loads. This document represents the current waste types proposed to be accepted/processed. The current waste treatment processes are listed below:

- **Sorting** - Incoming loads are mostly single waste stream from either pre-treatment or manufacturing processes. Sorting is only required for mixed loads accepted on site; this is carried out manually with the material handler, the target materials are high value ferrous and non- ferrous metals. Any residues of the sorting process will be dispatched for further treatment of site.
- **Shearing -** This takes place in the yard outside with an attachment on the material handler, and a static LeFort shear. This treatment process is carried out to reduce the particulate size of metal waste to facilitate handling and transport.
- **Bailing -** The bailing process is designed to compress metals for easier handling, storage and transport.

8. Site Plans and Maps

The site is located within the footprint of the Royal Eagle Close Industrial Estate, Rochester, Kent. The site is leased by RGE Recycling, RGE Recycling is a privately owned limited company

The National Grid Reference (NGR) for the site is TQ 75341 69619, WTW glass.stole.grand, lat, lon 575341, 169619 the site location is illustrated on the location plan (appendix 3). The site layout is shown on the site plan (appendix 1)

The site is located in a mixed-use area industrial area. The closest residential receptors are situated 694m to the northeast of the site –residents of Castle Street, with further properties to the north and East of the site. The main access to the site is via Royal Eagle Close, this leads straight to the site entrance. The surrounding land-use and receptors are identified on Appendix 2 (Sensitive Receptor Plan). Sources, Pathways and Receptors and are identified in the table below:

TYPE OF RECEPTOR	ID #	DESCRIPTION	DISTANCE FROM BOUNDARY (M)	DIRECTION
		SITE		
HUMANS AND PROPERTY	-	Site Workers	On site	-
	-	Site Visitors	On site	-
		COMMERCIAL		
	1	Multiple Industrial Units east of Anthonys Way	0 m	N, S, E, W
	2	Aggregates Facility off Royal Eagle Close (Heidelberg Materials)	51 m	SE
	3	Multiple Industrial Units north of George Summers Close	88 m	NW
	4	Factory off Royal Eagle Close	142 m	S
	5	Multiple Industrial Units west of Anthonys Way	191 m	WSW
	6	Sewage Works off Upnor Road	351 m	NNW
	7	Multiple Industrial Units south of Anthonys Way	362 m	S
	8	Multiple Industrial Units south & west of Whitewall Road	366 m	SW
	9	Military Training Facility (Tower Hill)	387 m	N
	10	Military Training Facility (Maritime Academy)	437 m	WNW
	11	3 No. Ship Docks; HMS Cavalier, Ocelot & Gannett	503 m	ESE
	12	Dockside Shopping Centre (Chatham)	605 m	E
	13	Multiple Industrial Units off East Road	624 m	ESE
	14	Assumed Future Development Site off Canal Road	816 m	WSW
	15	Multiple Office Buildings off Sir Thomas Longley Road	818 m	S
	16	Assumed Future Development Site off Acorn Wharf Road	844 m	SW
	17	Assumed Future Development Site off Comissioners Road	851 m	W
		RESIDENTIAL		
	1	Multiple Residential Properties off Castle Street	694 m	NNE
	2	Residents of Upnor	705 m	NNE
	3	Residents of Brompton	732 m	ESE
	4	Residents of Frindsbury	758 m	WNW
		ROADS & RAILWAYS		
	-	Royal Eagle Close	45 m	S
	-	A289	233 m	N
	-	Medway Tunnel	417 m	NE
	-	Railway Sidings within Chatham Historic Dockyard	808 m	SE
	-	A231	873 m	SE
		PUBLIC USE		

	1	Historic Dockyards & RNLI Museums	544 m	E
	2	Historic Dockyard Living Museum	683 m	SE
WATER		**SURFACE WATER**		
	-	Whitewall Creek	84 m	NNE
	-	River Medway	213 m	E
	-	Gundulph Pool	331 m	NE
	-	Multiple Drainage Channels between A289 & Upnor Road	382 m	NNE
	-	3 No. Docks within Chatham Historic Dockyard	527 m	ESE
	-	Feature Pool off Walter Burke Way	715 m	E
		GROUNDWATER		
	-	Bedrock Geology - Principal Aquifer	On site	-
	-	Superficial Layer - Secondary (Undifferentiated) Aquifer	On site	-
ENVIRONMENTALLY SENSITIVE		**AGRICULTURAL**		
	1	Multiple Packets off Arable Land north of the Medway Tunnel	441 m	NW
		DESIGNATED SITES		
	1	SSSI - Tower Hill to Cockham Wood	315 m	N
		NON-DESIGNATED SITES		
	1	BAP - Mudflats south of Medway Tunnel	66 m	NE
	2	BAP - Coastal & Floodplain Grazing Marsh adjacent to Whitewall Creek	128 m	NE
	3	BAP - Mudflats east of Royal Eagle Close	295 m	SSE
	4	BAP - Deciduous Woodland across the Tower Hill Estate	310 m	NNW
	5	BAP - Mudflats on the Dockyard bank of the River Medway	592 m	ESE
	6	BAP - Mudflats east of Admiralty Terrance	698 m	NE
	7	BAP - Deciduous Woodland off Parsonage Lane	721 m	WNW
	8	BAP - Mudflats south of Riverside	739 m	WSW
	9	BAP - Mudflats west of Ginsbury Close	751 m	SSW
	10	BAP - Mudflats off Castle View	833 m	WSW
	11	BAP - Deciduous Woodland off Dock Road	853 m	ESE
		HERITAGE SITES		
	1	Scheduled Monument - Multiple Features within Historic Chatham Dockyard	517 m	ESE
	2	c.50 No. Grade I & II Listed Buildings within the Historic Chatham Dockyard	564 m	ESE
	3	c.3 No. Grade II Listed Buildings at Manor House Farm off Parsonage Lane	665 m	NW
	4	Multiple Grade II Listed Features at All Saints Church (Frindsbury)	866 m	WNW
	5	c.8 No. Grade I & II Listed Buildings in Upnor	915 m	NNE
	6	Scheduled Monument - Artillery Battery at Upnor	975 m	NNE

Searches on MAGIC confirmed that the following protected sites are within 1km of the site's boundary:

- SSSI Tower Hill to Cockham Wood
- MCZ - Medway Estuary – Zone 1
- MCZ – Medway Estuary Zone 2

Protected Species within screening distance – 500M

Allis Shad migratory route

European Eel migratory route

River Lamprey migratory route

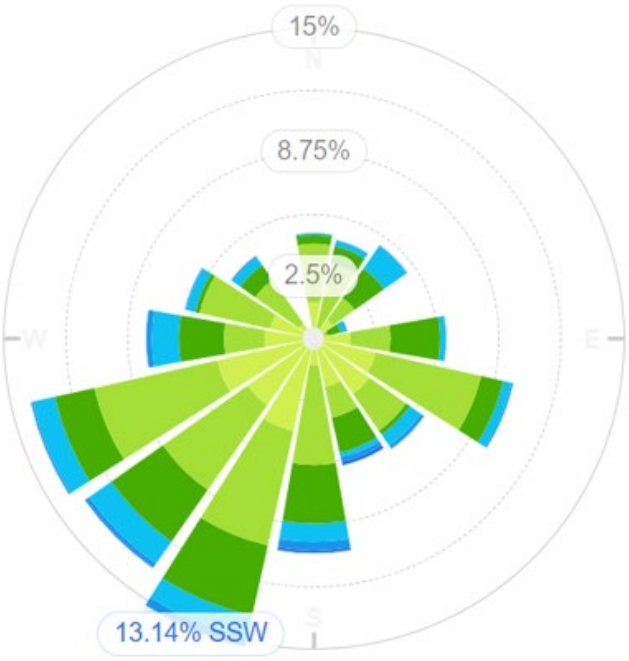
Sea Lamprey migratory route

Smelt migratory route

Identified Sensitive Receptors

See Sensitive Receptor Plan (Appendix 2)

Windrose



A Windrose providing the frequency of wind speed and direction from the Gravesend-Broadness Meteorological Station for the period of 2019 is presented. ***Location: 55.904, -167.311, Altitude: 41m above mean sea level Station type: Automatic.*** The Windrose shows that the most prominent wind direction is from the Southwest to the Northeast. Winds from the north, east and west are relatively infrequent. Smoke contains a multitude of combustion products including irritants and asphyxiants which are toxic. These toxic pollutants can impact anyone within 1km of the site and in certain circumstances will have an impact on public health at greater distances than 1km. Smoke will have a significant effect on human health, as detailed within the research studies. The fire and smoke would affect the immediate businesses, local houses and the wider industrial and residential areas.

Site Infrastructure Plan

The Environment Agency Guidance states that the site plan must show the following information:

- The layout of buildings
- Any areas where hazardous and flammable materials are stored on site (location of gas cylinders, process areas, chemicals, piles of combustible wastes, oil and fuel tanks)
- All permanent ignition sources on site and showing they are a minimum of 6m away from combustible and flammable waste.

- Any areas where waste is being treated or storing combustible waste or combustible non-waste material
- All separation distances
- Any areas where there is storage of combustible liquid wastes
- Any area where baling, shearing, briquetting, sorting, screening of metals take place
- Main access routes for fire engines and any alternative access
- Access points around the site perimeter to assist firefighting
- Hydrants and water supplies
- Areas of natural and unmade ground
- Drainage runs, pollution control features such as drain closure valves, and fire water containment systems such as bunded or kerbed areas (which might be on a separate drainage plan)
- Storage areas with pile dimensions and fire walls (where applicable) – this includes wastes stored in a building, bunker, or containers – including indicative pile layouts and ensure it is geographically representative
- The location of where fixed plant is stored and where mobile plant is stored when not in use
- The location of spill kits
- The quarantine area
- Anything site specific that should be considered

Appendix 1 shows all site features listed above

Below we have identified locations, distance, and travel times for all emergency services. Emergency services detailed below will be required to assist with the following incidents.

- Fire
- Medical Emergency
- Criminal activity

Emergency Services:

- **Strood Fire & Rescue Service**, 39 Gravesend Rd, Rochester ME2 3QT, 3.1 miles from the site, 8 minutes travel time.
- **Medway Police Station**, Purser Wy, Gillingham ME7 1NE, 2.2 miles, 5 minutes travel time.
- **Medway Hospital**, Windmill Rd, Gillingham, Kent ME7 5NY, 3.8 miles from the site, 11 minutes travel time.

9. Manage Common Causes of Fire

Arson
The site benefits from a continuous presence of staff during operational hours, currently between 7am to 5pm Monday to Friday, and Saturday between the hours of 8am to 13:00pm. The site will operate Sundays and bank holidays if required on an ad hoc basis.

Security features on site includes:

- 2m high perimeter fencing surrounding the site;
- Access gates which are equipped with a highly secure locking mechanism;
- CCTV system coverage; fully monitored by an alarm receiving center.
- Fully integrated intruder alarm system across site
- SIA Accredited. Keyholding – security patrols & alarm response.

All visitors and contractors are required to sign in and are escorted by a member of staff. CCTV is accessible to site operatives throughout the working day, and remotely viewable on mobile devices at all times. If a breach in security is detected inside of operational hours, site operatives would contact the Site Manager or their deputy and the emergency services as appropriate. Out of operational hours CCTV is monitored via a remote monitoring station, should a breach be identified the monitoring station would contact the mobile patrol, police, and the site manager. The same procedure would be followed if the integrated intruder alarm system was to activate.

All security measures on site are inspected at the commencement of every working day by the site TCM or Manager to ensure their continued integrity. Any defects or damages which compromise the integrity of the enclosure will be made secure by temporary repair by the end of the working day. Permanent repairs will be made within a maximum of 5 days. The monitoring station would report to the site manager any defective CCTV.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented, such as repositioning of CCTV cameras, repair of security infrastructure, and/or additional deterrents. This is recorded in the site diary. Records maintained include inspections and maintenance of perimeter fencing and gates, doors and locks, breaches of security, investigations and actions taken.

Mobile Plant and Equipment
Mobile plant and equipment consists of:

Make	Model	Attachment	Plant No	Serial Number
Fuchs (material Handler)	350S5	Grab	N/A	350410/5714
Fuchs (material Handler)	331	Selector Grab	N/A	331110/1887
Cat (ForkLift)	5f30c33	Forks	N/A	ct14g-00133
Mitsubishi (forklift)	fd25mc-t	Forks	N/A	Not Known

Mobile Plant and equipment is checked daily before use and regularly maintained as part of Health, Safety and Environmental Procedures and within manufacturer guidelines. Maintenance is recorded daily/weekly/monthly (depending on the maintenance requirements) and recorded on the plant maintenance sheets. Any faults or problems noted during the daily checks will be reported either directly to the manager/TCM or in his absence, the site supervisor so that the problem or fault can be rectified. Again, actions will be recorded using the sites defect sheet. Fire extinguishers are strategically located around the site to ensure that fires can be dealt with swiftly.

Mobile plant will be cleaned down as required to remove dust build up, fluff and any other potentially combustible materials. This will be an inspection criteria detailed withing the daily plant inspection sheets.

Mobile plant that is not being used is kept a minimum distance of 6 meters away from combustible materials. Employee/visitor/contractor vehicles are parked in the designated car park which is located at the front of the site well away from storage and processing areas.

Fixed Plant
Fixed Plant consists of:

Make	Model	Attachment	Plant No	Serial Number
Lefort - shear	Mobil 500	N/A	N/A	635
Cropper	200	N/A	N/A	663
Granulator	Type C-MD	N/A	N/A	122.003.22
Ferrous Shredder	GAZ 62	N/A	N/A	2010442
Air Compressor	bs5169 111E	N/A	N/A	0495

Fixed plant will be checked daily before use and regularly maintained as part of Health, Safety and Environmental Procedures and within manufacturer guidelines. Maintenance will be recorded daily/weekly/monthly (depending on the maintenance requirements) and recorded on the plant maintenance sheets. Any faults or problems noted during the daily checks will be reported either directly to the manager/TCM or in his absence, the site supervisor so that the problem or fault can be rectified. Again, actions will be recorded using the sites defect sheet. Fire extinguishers are strategically located around the fixed plant to ensure that fires can be dealt with swiftly.

Fixed plant that is not being used (E.g. at the end of the working day) will be overrun (shafts, conveyors etc) to ensure all combustible wastes are fully discharged out from the plant. This will take approximately 6 – 10 minutes (depending on what plant it is). Combustible waste will be kept a minimum distance of 6 metres away from all static plant (unless it is being used to process waste). There will be a site clean down at the end of each working day to remove any combustible material (fluff, dust, accumulations) from rollers, bearings and motors. Static Plant will be fully isolated at the end of every working day.

The site Manager and TCM will be responsible for all aspects of plant maintenance for safety, preventative maintenance, fire, and pollution prevention.

Electrical faults including damaged or exposed electrical cable
All buildings have been wired by a qualified/certified electrician and daily checks are carried out on all portable hand tools and electricals. Fixed electrical are protected from the operations activities but will undergo a full inspection every 3 years. In addition, an electrician will carry out annual checks on all electrical equipment as part of the PAT testing regime. This will also be recorded on the Maintenance Logs.

If cables are Identified as damaged, procedures are in place for reporting damage to cables to ensure isolation to these areas. The TCM will be responsible for making these checks and instigating repair works.

RGE Recycling uses the following Electrical Services contractors:

- **GJ Brown Electrical Ltd**, 23 Valenciennes road, Sittingbourne, Kent, ME10 1EN

Discarded smoking materials
A no smoking policy is enforced on site with clear signage prohibiting it. There are no designated smoking areas on site.

Hot Works

Hot works is not an intended activity for the site, however, If for anything hot works was undertaken (E.g. using cutting equipment for engineering works on plant) then this activity will carried out in a controlled setting due to it giving rise to sparks and through the generation of heat. A permit to work system will be implemented to factor in the risks involved with ignition and heat sources. A fire watch will take place after the hot works is complete. A hand held thermal imaging camera will be used to detect any residual heat. Once the heat has dissipated, the components will be placed into storage. The permit to work system will dictate what firefighting equipment will be needed. Waste and other combustible materials will be placed a minimum of 15 metres away from any hot works. Heat/spark screens will be erected around the hot works area.

Industrial Heaters
No industrial heaters will be utilised on site.

Hot Exhausts
360 material handlers are turned off when not in use, at least 6m away from combustible waste storage areas. Consideration is given to the high-risk time for hot exhausts (one hour after switching off when dust can settle on hot surfaces). Vehicles and plant are switched off at least 30 minutes before the end of the day, for them to cool down prior to site staff leaving site. They are also cleaned daily to remove any dusty materials. A fire watch is conducted via visual assessment a minimum of twice every working day to detect signs of fire caused by dust settling on hot vehicle exhausts or engine parts. A visual assessment is also conducted at the end of the working day.

Sunlight
Due to the nature of the waste, sunlight is not expected to be a high-risk source of ignition. In extreme heat temperature of stockpiles will be monitored with a handheld temperature gun to ensure compliant temperatures.

Ignition Sources
Potential ignition sources include hot exhausts and engine parts and discarded smoking materials (all described above). All ignition sources will be kept a minimum of 6m away from the storage of combustible and flammable wastes. A risk assessment will be made on all sources of ignition to ensure that they are required on site or if other items of equipment can be utilised instead (reduce requirement for items which carry inherent risks).

The site utilises mobile plant for processing wastes. There is the potential for sparks to be generated through scraping the ground with the cutting-edge and mobile plant attachments during operation. An assessment will be made to consider all sources of ignition, and to evaluate if they can be engineered out or if other items of equipment can be utilised instead (reduce requirement for items which carry inherent risks). Best available techniques and appropriate measures will be included within this assessment, but currently there are no examples or evidence to suggest there is an appropriate measure that needs to be complied with, or that any additional measure would be reasonably practicable when weighing the risk against the time, trouble, and money to implement. Standard industry practice across all waste operations and installations that utilise mobile plant is that sparks generated through contact with ground can only be reduced via the employment of competent operators who have undergone rigorous training. All plant operators will be fully trained and accredited under a recognised industry training scheme. Operators will be supervised daily to ensure their practice and skills are to a high standard.

Batteries
The site does accept and store lead acid batteries as part of its incoming waste streams. All batteries accepted as incoming waste streams, will be segregated and stored in a designated battery box with an acid-resistant base and with a lid to prevent ingress of rainwater. Batteries are dispatched from site as soon as practical to do so.

Batteries becoming damaged will be minimised:

- The sites waste acceptance procedures require operatives to visually inspect all wastes
- Good handling techniques if a battery is identified to minimise the risk of the battery becoming damaged.
- Site operatives will be trained to identify characteristics of damaged batteries

If a battery is identified as damaged or potentially damaged it will be immediately moved to the designated quarantine area. Batteries identified as unsafe will be dispatched to a suitable site as a priority.

End of Life Batteries in Plant

The Operator will ensure that batteries are disconnected in plant that is not being used for the foreseeable future to eliminate the risk of the plant short circuiting and causing a fire. All End of Life batteries from plant will be placed into suitable lidded battery boxes with an acid resistance base. Batteries will be stored upright (contact points facing upwards). if batteries are identified as damaged, they will be isolated away from other batteries of the same chemistries. These batteries (likely to be lead acid) will be stored separately from lithium Ion batteries.

Leaks and spillages of oils and fuels

All fuels and lubricating oils/fluids are will be stored safely. The DERV tank is double skinned and surrounded by a leakage containment bund capable of containing at least 110% of the volume of the tank. Bunds are impermeable and resistant to stored materials. Inspection of any spillages or leaks from containment will be completed at least once per shift by a site operative. The results of all daily and weekly monitoring will be recorded in the site diary, as well as any remedial actions. In the event of any potentially polluting leak or spillage occurring on site following actions will be taken:

- Minor spillages will be cleaned up immediately, using absorbent materials. The resultant materials will be placed into labelled containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from flowing outside the permit boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed within 24 hours of the incident taking place.

All equipment and plant is inspected on a daily basis for leaks. All operational staff will be trained on the spillage procedure. The spillage procedure is included in appendix 12

Build up of loose Combustible Waste, Dusts, and Fluff

The site will be inspected regularly for the build-up of loose combustible waste, dust and fibres. This material will be removed from site on a regular basis, and immediately if near a source of ignition or heat. The frequencies are outlined below:

Inspection to assess the build up of loose wastes, dusts and fluff	Date	Time	Actions Taken	Signature
Loose waste inspection 1		12:00		
Loose waste inspection 2		16.30		

The risk of the build-up of combustible waste, dust and fluff is low due to the following measures implemented on site.

- All incoming waste is off loaded directly into the storage areas to minimise unnecessary handling and transport distance therefore minimising the potential for wind-borne dust;

- All plant and equipment is subject to a programme of planned preventative maintenance which follows the inspection and maintenance schedule recommended by the manufacturer. This includes corrosion prevention where applicable;
- Storage areas benefit from daily housekeeping.
- Site access roads and external operational areas are maintained and swept regularly to reduce dust generation;
- Daily visual inspection of the site and site boundary is carried out by the TCM;
- Daily site shut down procedure which includes the over running of conveyors, rollers, and shafts to ensure all materials are discharged to the bag houses and a full clean down proceeds.

The TCM (Technically Competent Manager) will formally log entries onto the site diary as illustrated below:

Date: **Weather Conditions:** **Wind Speed:** **Wind Direction:**

Condition of the site perimeter		Condition of impermeable surfaces		Noise levels at acceptable levels	
Hazardous substances suitably stored		Site security systems		Site free from pests/vermin	
Site shut down procedures		Condition of site drainage systems		Site infrastructure in good repair	
Site noticeboard present in good repair		Waste containers free from damage		TCM attendance meets permit requirements	
All waste stored on-site is compliant		Litter contained in skips/bins		Site equipment/plant in good repair	
Non-compliant waste quarantined		Mud/debris not escaping		Compliance with the duty of care documentation	
Mobile/static plant in good repair		Dust, fluff, loose combustible waste		Spill kits in place	
Waste volumes on-site compliant		Odours on-site at acceptable levels		Fire equipment in place	

Reactions Between Wastes

All waste storage areas are either separated by bays/walls or separation distances of at least 6m. The location of the storage areas are illustrated on Appendix 1. Strict waste acceptance procedures are implemented on site to ensure that only permitted wastes are accepted. All incoming loads are booked in advance and the current holder of the waste will be subject to full duty of care checks. When waste arrives on site the load list and paperwork are checked against the received waste, and the weight and description of goods is verified against the load list, at the incoming weighbridge. Incoming loads are visually inspected for quality and discrepancies by checking that the material conforms with the EWC codes and description of the material on the weighbridge. Unauthorised wastes are immediately placed into a quarantine area (and marked with a yellow quarantine sign). The site manager notifies the customer of the non-conforming material within 24 hours of receipt, and where the material is not permitted, arrangements will be made to return the material to the customer at the customer's expense.

The site does not accept loose combustible wastes (where non-compliant waste could be disguised) therefore the risk of a reaction between the wastes is negligible. Care will be taken to ensure that any non-conforming wastes found within loads are stored in an appropriate manner; for example, avoiding the storage incompatible wastes such as oxidisers and flammable together. The quarantined wastes will be checked daily as a precaution.

Additionally, the small subset of waste streams accepted by the operator are extremely valuable. The operator will only accept waste on a contractual basis. It is not an open disposal site.

Deposit of Hot Loads

No burning, reactive/reacting or visibly hot (producing steam or heat) loads are accepted on site. Each load is visually inspected at the site office to ensure compatibility with accompanying duty of care documents. Site operatives undertake a visual inspection at the waste reception area for signs of heating such as steam and smoke. This minimises prohibited/volatile wastes and the acceptance of hot loads. Instructions are given to suppliers to ensure no hot loads are accepted on site. Should a hot load be deposited on site, it will immediately be removed to the dedicated quarantine area and extinguished immediately. Any fire damaged waste will be removed from site as a matter of priority to a suitably permitted facility for disposal

Hot loads are not expected to arrive on site but If non-compliant waste/hot loads is identified, the wastes will be isolated and placed into the designated storage area (quarantine area). This can be seen on the site plan. The area can store 50% of the largest stockpile on site. The quarantine area is a minimum of 6 metres from other waste types.

The waste will be extinguished and/or safely isolated to allow the heat to naturally dissipate. Any volatile material/waste (volatile being that the waste is a hot load with a higher probability of self-combustion) will be transferred off-site at the first opportune moment and when safe to do so. Depending on the nature of the waste and of its constituents and organic fraction, the waste will be cooled by turning it using the on-site mobile plant. This will allow the waste to aerate and reduce the core temperature. Hot loads will be continuously monitored using the sites thermal imaging gun. Once the waste is deemed safe, it will be dispatched from the site. The TCM (Technically Competent Manager) or site manager will be responsible for determining the safety of any load.

Storage of Fuel, Oils and Maintenance Fluids

Procedures will be put in place to ensure safe storage of fuels and fluids associated with maintenance. Guidance will be taken from the HSE and the fire and rescue service

Hazardous materials such as maintenance fluids will be stored within a bunded spill tray situated in the maintenance building (plan 1) - to reduce the associated risks. Fluids will be stored in appropriate containers and will be located within bunds. They will be located away from likely sources of ignition, away from the perimeter of the site, away from processing areas and out of the direct line of traffic. flammables and oxidizing substances will not be stored together.

DERV will be Stored within a 4500L tank within a secondary container, to comply with the relevant oil storage regulations. Situated to the outside of the building. The storage will be covered by CCTV. (Plan 1). A fire within this zone will be deemed an emergency and the emergency services will be called within the first instance, and the site evacuated.

10. Prevent Self-Combustion

The most effective way to reduce the impact from fire on site is to prevent them from occurring in the first place. Managing storage times, pile volumes and height, and the temperature of the wastes can prevent the self-combustion of wastes.

The locations, sizes and composition of the stockpiles are presented within Appendix 4 (Waste Table) and Appendix 1 (site plan)

Self-combustion of waste on site is not considered to be a significant risk due to the nature of the waste, and because waste is segregated into dedicated storage areas. The controls in place to reduce the risk from fire are summarised as follows:

- No loads are removed without an onsite operative in supervision;
- A visual watch is performed as the loads are received and unloaded; and
- Quarantine areas are kept available. Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded, and the vehicle turned away. If wastes have already been discharged and are deemed not to conform or otherwise not be permitted, then the waste will be:
- Removed to a designated quarantine area and marked with a yellow sign; and
- The site manager will notify the customer of the non-conforming material within 24 hours of receipt and arrangements will be made to return the material at the customer's expense

Waste Storage Times
A summary of the storage times for wastes received under standard operations is provided in the table below:

Waste Received	Storage	Maximum Storage Time
Waste Metals	Bays or Containers	90 days from delivery

All storage times are detailed in Appendix 4 (Waste Table)

Waste Storage

Waste will be emptied/collected from site in order of when it was stockpiled to maintain stock rotation. The traditional 'stock rotation' to dissipate heat from the waste is not required due to the in-organic nature of the waste. It is also considered that traditional stock rotation could increase the risk because the waste metals could generate heat and sparks through friction.

Waste will be stored no higher than 4 metres high. The full waste storage dimensions are detailed within the waste table in appendix 4. All waste can be accessed in the event of a fire via the use of mobile plant. In the rare instance that the waste needs to remain within the storage area for a prolonged period of time, an increase in thermal monitoring will be undertaken to deal with the increased risk of fire. Due to the value of metals (aluminium), waste will be removed from the site as soon as possible to prevent the risk of theft. Once a full load is prepared, transport will be arranged for its removal so it is not envisaged that stock rotation is necessary or relevant to this waste type. The mobile plant will move the waste away from the fire area to prevent the fire spreading.
RGE Recycling can demonstrate that the stored processed waste is removed from site on a regular basis. The Operator has multiple contracts and outlets in place to prevent waste being stored on site for an excessive period of time. If a situation evolved where a current outlet stopped trading, the Operator would either transfer their waste to another waste management company (many of whom have a historic working relationship with the Operator).

Some materials may self-combust, this means that as they degrade through oxidation they can generate heat, this heat can build to a point where the stack of material can catch fire on its own. These materials include:

- End-Of-Life Tyres
- Smaller size or graded materials either stored or mixed;
- Material that has not had potential hazards removed before stacking e.g. exposed rust (which can generate heat); and
- Treated materials that are not cold before storage (treatment processes can generate heat).

The Operator will put the following operational procedures, to ensure that the waste is on site for no longer than 90 days:

- Rejected wastes will be recorded and will be stored within the quarantine area, a record will be kept within the site office;
- Authorised wastes will be processed on site and stored within an appropriate area of site;
- Stock will be treated and dispatched from the site in order of when it arrived on site (although stock that is a potential risk will be removed as priority as outlined above), this is to reduce the risk associated with storing combustible materials; and
- A daily inspection will be undertaken by the TCM or site manager. if there is any doubt to the condition of the material, the material will be removed from site as priority;
- A weekly review of the storage times and the stockpiles will be made by the Authorised Person to ensure that all stock is removed within 12 weeks

It also must be considered that the Operators Fire Prevention Plan is a live document and will be updated throughout the life of the site, and that the updates will detail any increase or decrease of importation quantities and will incorporate the most recent EA's Fire Prevention Plan updates. Any proposals to amend the FPP and associated management system will first be submitted to the Environment Agency for approval.

Monitoring and control temperature

The site is continually manned during operational hours and site operatives remain vigilant at all times and look out for signs of fire. Staff are trained in how to identify fires and fire hazards on site. During operational hours, the temperature of all waste storage is checked at 4-hour intervals (or twice daily) by site operatives, using a handheld infra-red thermal imaging gun to detect any temperature increase. The inspections are documented in the site diary, and all findings are logged. If a temperature of above 50°C is detected, the actions described in the table below will be carried out

Temperature (°C)	Actions needed
0 - 50	No Actions Required
50 - 65	Report to management and increase monitoring to an hourly basis
65+	Immediately remove waste from the stockpile to the quarantine area and report to management.

All material storage areas are visually inspected by site operatives throughout the day and all findings are logged in the site diary as a minimum. Should signs of self-combustion be identified such as steaming/smoulder/smoking, the pile will be removed to the quarantine area using suitable mobile plant. checks of the affected stockpile will be increased to hourly for the remainder of the day to ensure no further hotspot development occurs. The stockpile where the waste originated from will be targeted for high levels of monitoring.

11. Manage Waste Piles

All stacks and piles of wastes will be stored in a manner that allows emergency vehicular access to the whole site at all times and will meet the standards for maximum height, width, length, volume, area and separation for fire breaks in accordance with the relevant guidance (11th January 2021 updated edition)

Appendix 4 (Waste Table) provides information on the amounts of combustible waste stored on site, as well as the storage arrangement, height, volume, and fraction size.

Waste piles must be managed carefully to help to prevent the risk of self-combustion and limit the scale of a fire if one breaks out. Wastes that are not kept in their largest form which increases the risk of fire. it is imperative that these stockpiles are managed to reduce the associated risks. The site will keep clear a freeboard space of 1m minimum at the top and sides of walls at all times, this will ensure that flames cannot spread between bays.

Waste materials are stored on site in their largest form (until processed). Under normal operating conditions, waste will be processed within 90 days of receipt on site. Once the waste has been processed, it is removed from site as soon as possible. RGE Recycling has weighbridge data systems that allows the site manager to record how long waste is stored on site for. This ensures that the 'first in first out' principle is applied.

All wastes will be stacked no more than 4 metres heigh. The entire site surface is impermeable. There is no uneven ground beneath the waste.

The stockpiles do not exceed 20m in any direction (max length or width allowed on guidance). The TCM will carry out daily checks to assess the size of the stockpile and the separation distances, to ensure that the dimensions outlined within Appendix 4 are adhered to. When the stockpile reaches 75% capacity, measures will be implemented to slow the input of material into site and increase outputs until stocks can be reduced.

The Operator will not accept incoming wastes beyond the capacity of the pile size; this will ensure that the volume of waste accepted on site can be managed in a controlled and safe manner.

12. Where Maximum Pile Sizes do not Apply

All wastes stored on site must comply with the maximum pile sizes as per the Environment Agency Guidelines

13. Prevent Fire Spreading

Waste will be stored within designated storage areas as illustrated on the site plan (Appendix 1).
6m separation distances or thermal barriers between waste storage areas will be implemented at all times. A fire water calculation will ensure there is enough fire water resource to extinguish the largest stockpile of metallic waste. Waste bays will be constructed using concrete panels or concrete lego blocks where a thermal barrier is required

14. Quarantine Area

The quarantine area will be used to place burning wastes (if appropriate) to extinguish them. It may also be used to hold unburnt wastes if the burning waste is in another area of site and cannot be relocated to the quarantine area

The quarantine areas are located within the permit boundary, as shown on Plan (1) this area is engineered to be impermeable. The quarantine area is capable of holding 50% of the volume of the largest stockpile on site.

Dependent on the size and location of a fire, the mobile plant on site is capable of quickly clearing an area around the burning waste to provide a flexible quarantine area. One of the specified quarantine areas will be kept clear at all times (unless being used in the event of a fire) If the quarantine area will remain accessible at all times.

In the event of a fire, the following procedure will be put in place:

- During a fire event, the Authorised Person will inspect the quarantine
- Mobile plant will be utilised to move temporarily quarantined material.
- Burning materials or hot waste will be transferred via mobile plant to the quarantine
- The quarantine area has a 6 metre circumference from the site boundary, building and wastes

The location of the quarantine areas are illustrated on Appendix 1 (site plan). The placement of the quarantine areas is based on the following factors:

- It allows for the prompt and direct removal of smouldering, burning or fire damaged wastes from the waste storage and to allow access by the Fire & Rescue Service (FRS); and
- Proximity to flammable liquids – the quarantine area is situated at least 6m from any potentially flammable liquids on site such as the diesel tank.

Procedure for using the Quarantine Area

The Site Manager instructs all site operatives when and how the burnt or burning waste, or any hot loads delivered accidently to site, will be moved to the quarantine area. The following procedure will be implemented on site:

- When it is safe to do so, the waste will be moved by on plant to the quarantine area; The movement of the waste will be overseen at all times by the Site Manager or TCM to minimise any spillages and ensure the area is not overfilled;
- To limit any spillages, plant will not be overfilled when moving the waste;
- The burning or smouldering waste will be doused using the relevant fire extinguishers and water supplies;
- Burnt waste will be taken off site to a suitably permitted facility within 7 days (or sooner depending on WM3 assessment requirements). All site operatives will be trained to follow this FPP and all procedures listed in the above sections

15. Detecting Fires

The site does not store waste inside of a building. There are 'Out of hours' contacts, who will be responsible for attending site and will contact the fire brigade in the event of an alarm. RGE Recycling have an agreement in place with resident businesses who operate on a 24 hour basis. The agreement is to notify the designated person in the event of detecting a fire.

- Ryan Eastwood (Director)
- Maria Eastwood (Director)
- John Clarke (Site Manager)

Out of hours, The following members of staff are keyholders and would be in attendance of a fire within both within 4 minutes & 17 minutes;

Key Holder 1 Ryan Eastwood	46 Kent Avenue, Sittingbourne, Kent ME10 1HD	**12 miles – 15 minutes**
Key Holder 2 Nicolas Stone	38 Darnley Road, Strood, Rochester ME2 2HH	**2.9 miles – 4 minutes**

The site is continuously monitored by site operatives throughout the working day to ensure the early detection of fires in waste storage areas. All areas where waste is stored are visually inspected throughout the day by site operatives, and outside of operational hours by the resident businesses who operate on a 24 hour basis. All findings are logged in the site diary. The site is fully equipped with CCTV cameras. If a fire is identified on the CCTV, site operatives will call the FRS during operational hours, and outside of operational hours resident businesses would call the FRS followed by the nominated site contact as above. Site boundary checks are completed weekly to ensure site security is maintained and the risk of arson is reduced.

- The will be inspected visually throughout the day and at the end of the day for hot waste
- The site will be inspected with a hand – held Thermal Imaging Camera throughout the day and at the end of the day for hot waste
- The CCTV (cameras/monitors) can be remotely viewed

16. Suppressing Fires

The site is equipped with various fire extinguishers, adequate to tackle a small fire. The site also benefits from mains water that can be deployed to suppress a small fire. Mains water is also available for firefighting activities.

Use a Class D Fire Extinguisher

- Class D fire extinguishers are designed specifically for metal fires, including aluminium. These extinguishers discharge a special dry powder (often made from sodium chloride or other salt-based compounds) that smothers the fire, cutting off oxygen and dissipating heat.
- The dry powder is effective at absorbing heat and forming a crust over the burning material to prevent the fire from spreading.

The site does not require automated fire suppression systems as there are no buildings which are used to store waste.

17. Firefighting Techniques

All site staff will be trained to understand the principle that no one should put themselves at risk to fight a fire. Upon the detection of a fire, if it is safe to do so, site staff should attempt to extinguish the fire

The site provides the following resources:

- Separating unburnt material from the fire using heavy plant if safe to do so; and

- Separating burning material from the fire to extinguish it using;

- 8 x 9 litre class D fire extinguishers. The fire extinguishers are distributed throughout the site, as illustrated on the site plan (Appendix 1)

The closest Fire Station is located Strood Using google directions and mapping, the drive time is approximately 8 minutes and approximately 3.1 miles between the site and the Fire Station.

Fire extinguishers are to be used in the following circumstances:

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

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

- A fire or area of smouldering waste will not be dealt with in-situ, mobile plant will be utilised to pull the affected waste into the open and away from any further waste that could become a light on contact; and
- Depending on the size/nature of the fire the waste will either be: Extinguished immediately utilising the fire extinguishers; or Moved to the quarantine area and extinguished.
- Depending on the size, location and nature of the fire the burning waste will be pulled into the quarantine area following the procedures detailed within this fire prevention plan.

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

Uncontainable Small Fire or Large Fire
The following procedure is in place on site that will be followed in the event of a small fire becoming uncontainable or in the event of a major fire onsite;

- The Site Manager and FRS will be contacted immediately. The EA will be notified at the first opportune moment.
- Following arrival of the FRS, all site staff will take instructions from the FRS which may include any of the following:
- If possible, waste that is unburnt will be doused with a fire extinguisher to prevent the fire from spreading further;
- If possible, unburned material will be separated from the fire using heavy plant;
- The burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- The site and buildings will be evacuated.

18. Water Supplies

The site itself is serviced by mains water that is available for firefighting activities.
From EA guidance – the worst-case scenario would be the largest waste pile catching fire and a water supply of a least 2,000 litres a minute for a minimum of 3 hours is required for a 300 m3 pile of combustible material if no other actions are taken e.g. fire breaks. Site will maintain adequate fire breaks (by distance).

The closest fire hydrant to the site is located approximately 350 meters away. In addition, Southern Water operates a wash-down link positioned at the entrance to the industrial estate, 72.3 meters from the site entrance (grid reference TQ 75312 69514). The fire service has previously utilised this supply during an incident on site and has confirmed that it is authorised for firefighting use. The wash-down connection is 200 mm in diameter and provides a sustained flow of at least 3,000 liters per minute, with a maximum capacity of up to 6,000 liters per minute, ensuring an adequate and reliable water source for emergency response.
The largest stockpile of combustible waste on site is 240 cubic meters. 6.7 liters of water is required per minute, per cubic meter for a period of 180 minutes. We have calculated that the amount of water needed for a stockpile of this size is 289,440 liters with a minimum flow rate of 1608 liters per minute.
The wash down link adequately meets the site's water resource requirement for extinguishing its largest stockpile.

19. Managing Fire Water

The site has a maximum firewater containment capacity of 630,000 liters, achieved within the main yard area measuring 70 x 40 meters, with water retained to a depth of 20 cm (1,647.82 m^2). All surface water drains to the interceptor system, which ensures full site containment in the event of firefighting activities. The interceptor outlet to surface water will be sealed using a 150 mm bladder balloon device (Appendix 13). This system is kept in position and connected to a permanent airline, enabling rapid deployment. Operatives will attach a static compressor to the airline to ensure the seal remains effective. The location of the installation is shown on Site Layout Plan 1.
The site perimeter is secured either by a 6-inch bunded kerb, a waste bay wall, or a building structure, providing effective containment boundaries. There is no need to block drains/gullys on site, as all drains run to the sealed interceptor, the interceptor will be blocked using the balloon system detailed above. See site layout plan appendix 1, this demonstrates firewater containment area, and bunded kerb line.

Keyholders will have access to the building and the interceptor balloon system (compressor), ensuring that these controls can be deployed out of hours, All keyholding staff will be trained on the deployment of the interceptor balloon, we will also carry out emergency preparedness drills to ensure efficiency. access to the site can be seen on the site plan – appendix 1. Keyholders detailed below.

Key Holder 1 Ryan Eastwood	46 Kent Avenue, Sittingbourne, Kent ME10 1HD	**12 miles – 15 minutes**

Key Holder 2 Nicolas Stone	38 Darnley Road, Strood, Rochester ME2 2HH	**2.9 miles – 4 minutes**

The site surface is engineered in line with Building Regulations Document H. The gradient will allow liquids to flow towards the interceptor gully inlets drains and away from the site boundary. After a fire event, any contaminated firewater stored within the interceptors and above ground will be pumped into IBCs.

The drains on site must be kept clear of debris and blockages at all time to ensure egress of water in an emergency. The Authorised Person will check the drains on a regular basis. Combustible waste piles are stored on an impermeable surface and not hard standing - therefore the potential threat to groundwater, wells, springs and boreholes is eliminated.

All stacks, piles and containers of combustible material shall be stored in accordance with the fire plan to ensure the risk of a fire spreading from one stack to another is minimised. Firewater runoff will likely contain a moderate biological and chemical oxygen demand as well as trace compounds dissolved from the gaseous emissions, along with metals. As this site can contain contaminated firewater, the environmental impact from the runoff will be eliminated.

20. During and After an Incident

The Operator would cease operations until the Environment Agency / Fire Service advised that the site could be reopened. additionally, to this, the site will (if deemed necessary) instruct a structural engineer to ensure that the building structure has not been compromised because of the incident. An electrical engineer would also be instructed to check and repair any damage sustained as part of a fire. The Operator has outlets in place to divert wastes as required.

The Operator will inform those who may be affected by fire, such as nearby residents and businesses, via word of mouth. During fire event training sessions, specific site staff will be given specific areas to visit during a fire event – the site staff will be asked to inform those affected that there is a fire event on site, and will give useful information such as to close windows and doors if possible and to avoid the area until the fire is under control. The site staff will also pass on any specific instructions from the FRS.

The Operator will ensure that if the waste has become hazardous in nature as a result of the fire, the waste will be tested and assessed prior to removal from site, and that consignment notes will be issued in transit to the receiving site. The receiving site will be fully permitted and aware of the potential hazards associated with the wastes.

Any fire water that is contained within the yard will be pumped into IBC's and later collected via tankers. The Operator will ensure that all fire-damaged waste is be removed using an appropriate EWC code

The method for extracting the water would be via a tanker. Tanker services typically include:

- High pressure drain jetting
- Flood water removal
- De-silting sewers and gullies
- Grease trap emptying
- Septic tank & cesspit emptying
- Road gully and linear drainage clearance
- Pump station cleaning
- Bund wall cleaning
- Balancing lakes and lagoons
- Interceptor cleaning
- Lift chamber cleaning and maintenance
- Reactive insurance work
- Pre-planned maintenance

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

- A fire or near miss of a fire on site;
- A change or review of legislation;
- A change in the environment surrounding the site;
- A change to operations on site; or
- If the site is instructed to do so by the EA.

It is the responsibility of the Site Manager or nominated person to maintain this FPP and to ensure it is adhered to in the event of a fire on site.

POP's

The EA guidance states that during a fire, waste material containing POP's may release the POP's into the air or water course. Where you have this type of waste material you must ensure that your clean-up operations take the presence of POP's into account. If any POP's waste is involved in a fire, all residues from that fire may contain POP's and must be treated in line with the POP's Regulations. The site will have all fire-damaged waste tested for POP's (Persistent Organic Pollutants), as well as wastes that were not fire-damaged or in direct contact with discharged fire water runoff for POP's in case dust deposits from the fire have contaminated any other waste stream. The discharged fire water run-off will also be tested for POP's. RGE has contacts in place with waste incinerators to destroy POP's waste. For water containing POP's, the site will seek the services from Adler & Allan who are equipped and permitted to collect, transport, and treat hazardous liquid wastes.

Adler&Allan
ENVIRONMENTAL RISK REDUCTION

Find out how Adler and Allan can identify and mitigate risk to protect your reputation, your staff and your environment.

We manage the collection, treatment and disposal of hazardous and chemical waste

- We're experts in the removal and disposal of hazardous and non-hazardous waste
- Reliable and safe waste collection and management service
- 500+ Dedicated professionals
- Over 5,000 qualifications throughout the Group
- ISO 9001 and ISO 14001-accredited
- Experts in dealing with hazardous materials
- Our waste management facilities and specialist equipment mean we're ready and on hand for all types of waste, including bulk liquid, oil, packaged hazardous wastes, and laboratory chemical smalls
- We handle flammable, oxidisers, toxics, and non-hazardous waste material
- When we dispose of waste, we use our in-house facilities which ensures cost-effective hazardous and toxic waste management solutions
- Our waste licence number is: WML80669

Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number

EPR/NP3234LD

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/NP3234LD/V004 authorising,

Adler and Allan Limited ("the operator"),

whose registered office is

80 Station Parade
Harrogate
North Yorkshire
HG1 1HQ

company registration number **00318460**

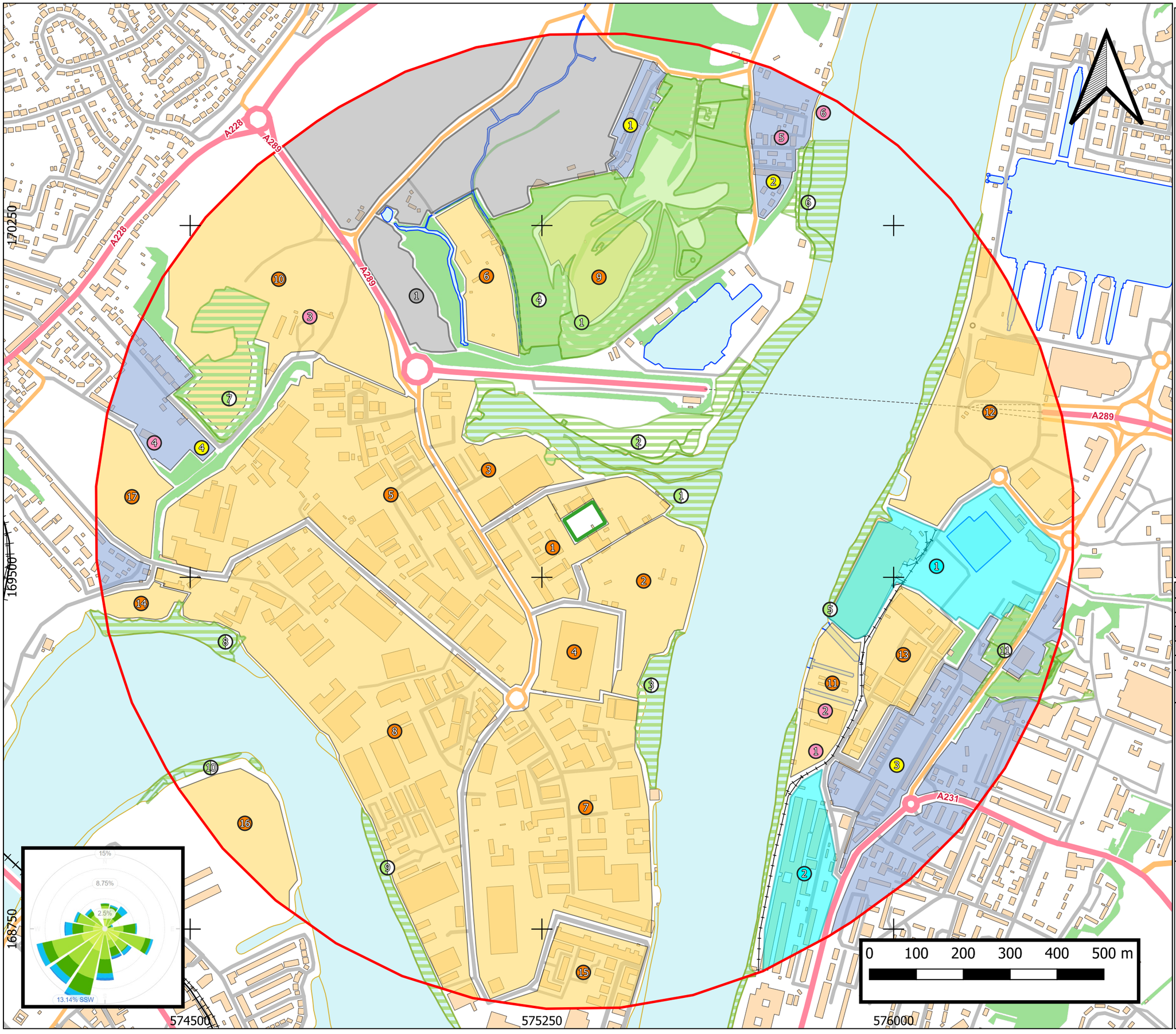
to operate an installation at

Worsley Waste Transfer Facility
3 Harcourt Street
Worsley
Manchester
M28 3GN

to the extent authorised by and subject to the conditions of this permit.

Appendix 1 –

Appendix 2 –



Key:

- Permit Boundary
- 1 km Buffer
- Residential Area
- Commercial Area
- Agricultural Area
- Public Use Area
- Designated Site Area
- Non-Designated Site Area
- Residential ID
- Commercial ID
- Agricultural ID
- Public Use ID
- Designated Site ID
- Non-Designated Site ID
- Heritage Site ID
- Railway
- Surface Water
- Woodland

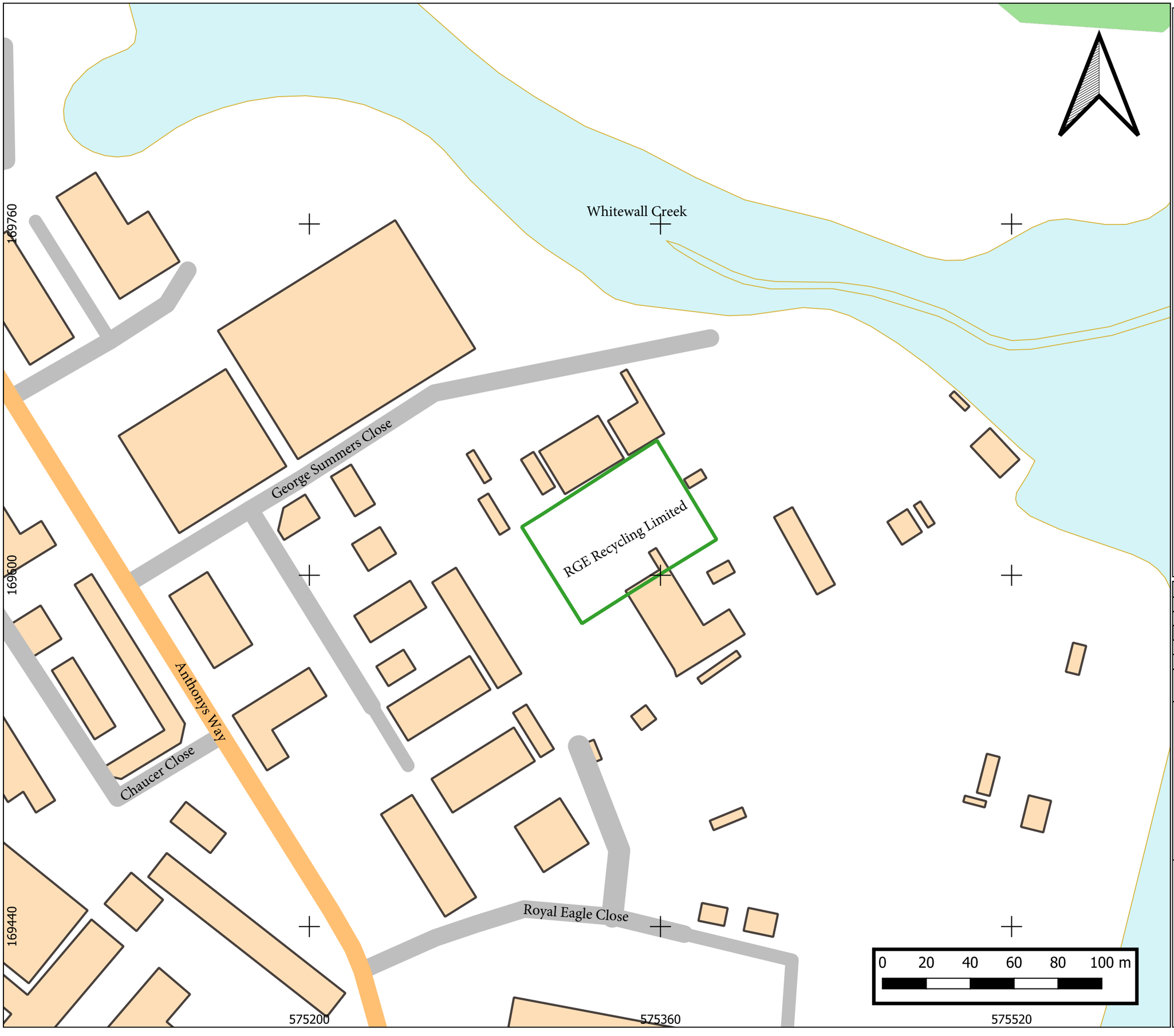
Drawing Title: Sensitive Receptor Plan 1 km
Ref:
Scale: 1:7500 (A3)
Date: 2025-04-01
Revison:
Drawn By: TW
Address:R GE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF

Changelog:
- N/A

RGE RECYCLING LTD

EnviroAwards

Appendix 3 –



Key:

Permit Boundary

Drawing Title: Permit Boundary Plan
Ref:
Scale: 1:1600 (A3)
Date: 2025-10-07
Revison:
Drawn By: TW
Address: RGE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF

Changelog:
- N/A

RGE RECYCLING LTD

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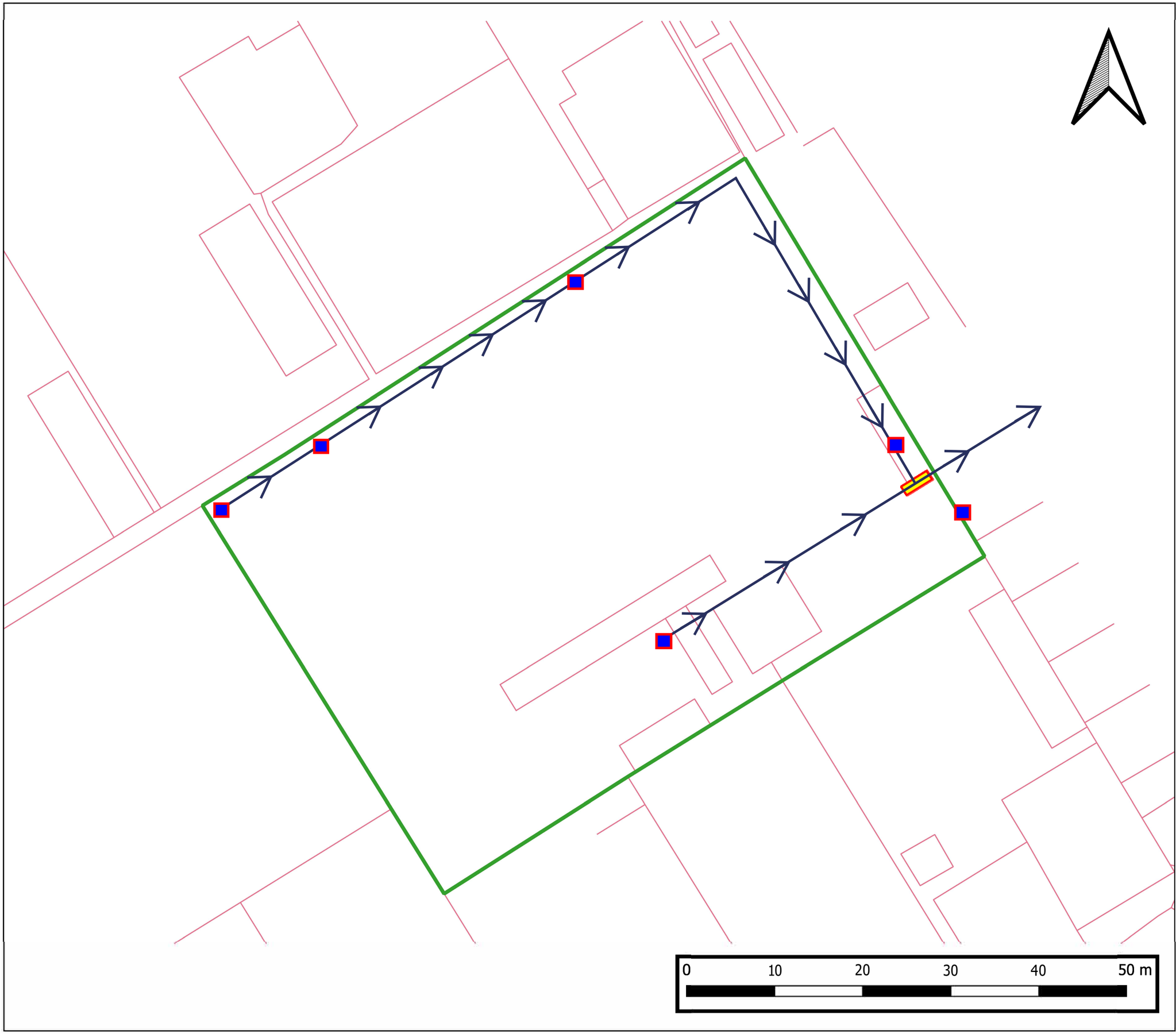
Appendix 4 –

Waste Table						
Material / EWC	Max Volume	Size Of Pile or Container W x L x H	Location on Site – see insert below	Max Time on Site	Combustible Y/N	Fraction Range
Scrap Metal	240 M3	8X10X3	Storage area 1	90 Days	Yes	Above 150 mm
Scrap Metal	240 M3	8X10X3	Storage area 2	90 Days	Yes	Above 150 mm
Scrap Metal	240 M3	8X10X3	Storage area 3	90 Days	Yes	Above 150 mm
Scrap Metal, Wood, General (waste generated on site)	240 M3	8X10X4	Storage area 4	90 Days	Yes	Above 150 mm
UPVC	240 M3	8X10X3	Storage area 5	90 Days	Yes	Above 150 mm
Quarantine Area	240 M3	8X10X4	Storage area 6	90 Days	Yes	Above 150 mm

Appendix 5 -



Key:

- Permit Boundary

Interceptor

Drainage inlets

Drainage channels

Direction of travel

Drawing Title: Site Drainage Plan

Plan Ref: Appendix 5

Scale: 1 A3( )

Date: 2025-07-30

Revison: V1

Drawn By: R.O'Brien

Address: RGE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF

Changelog:

- N/A

Appendix 6 –

Fire Rescue Service Access
RGE Recycling - Royal Eagle Close, Rochester, ME2 4NF

Appendix 7 –

Date: **Weather Conditions:** **Wind Speed:** **Wind Direction:**

Condition of the site perimeter		**Condition of impermeable surfaces**		**Noise levels**	
Thermal Camera in use/working		**Site security systems**		**Pests/vermin**	
Fixed plant/equipment in good repair		**Condition of site building**		**Site infrastructure in good repair**	
Site noticeboard present & in good repair		**Quarantine area clear for deposit**		**TCM attendance meets permit requirements**	
All waste stored on-site is compliant		**Litter**		**Portable extinguishers checked and in place**	
Non-compliant waste quarantined		**Mud/debris**		**Compliance with the duty of care documentation**	
Mobile plant in good repair		**Dust & Fluff not accumulating**		**Spill kits in place**	
Waste volumes on-site compliant		**Odours**		**Fire equipment in place**	

Daily checks		
Check	Time	Comments
FPP Measures Implemented		
Sandbag visual assessment for damage/quantity		
Interceptor balloon in place		

Weekly checks		
Check	Date	Comments/Actions
Fire Alarm Check		
Fire Equipment Checks		
Other (please specify)		

Thermal checks		
Check	Time	Temperature/Comments/Actions
Thermal Check 1	08:00	
Thermal Check 2	12:00	
Thermal Check 3	16:00	

Details of any construction work, Maintenance, Breakdowns, Emergencies, Environmental Problems or Severe Weather Conditions affecting Waste Management Activities on site	

General site activities, complaints, non-compliance details	
	Operating hours
	Start:
	End:
	Site Name
	Staff on site
	TCM on site
	Name:
	Date:
	Time in:
	Time out:
	Sign:

Appendix 8 –

Appendix 8 – CF - 06 FIRE SAFETY TRAINING PROGRAMME

All employees will receive adequate fire safety training and all fire safety training sessions will be delivered by a competent person. There will one / two fire drills per year to test the fire safety training.

Fire Safety Training Sessions

New Employees: Induction Programme

Current Employees: MIN one session per year

Fire Wardens: One / Two training session per year specific to their duties

One / Two training session per year specific to their duties and including fire safety risk assessment, responding to fire hazards, fault reporting procedures, liaising with the fire service, record keeping, induction of new staff, fire safety policies and procedures.

Topics

- The significant findings from the fire risk assessment and fire safety policies
- The Fire Plan
- What to do on discovering a fire
- How to raise the alarm, including the locations of fire alarm call points (break glasspoints)
- The action to take upon hearing the fire alarm
- The evacuation procedure for alerting guests, residents and visitors including, where appropriate, directing them to exits and assembly points at a place of total safety
- The arrangements for calling the fire and rescue service
- The location and, where appropriate, the correct use of portable fire extinguishers and fire-fighting equipment
- Knowledge of escape routes including stairways and especially those not in regular use
- How to open all emergency exit doors
- The appreciation of the importance of fire doors, keeping them closed and not wedged open to prevent the spread of smoke and heat, keeping escape routes unobstructed
- Where appropriate, isolating electrical power and gas supplies and stopping machines andprocesses
- The safe use of and risks from storing and working with highly flammable and explosive substances
- General fire precautions, fire awareness and good housekeeping practices
- The no smoking policy (where applicable)
- Special provisions for assisting disabled people and any trainingneeded
- Identifying fire hazards and fire incidents reporting procedures
- Equipment fault reporting procedures

Fire Safety Training Records

All fire safety training will recorded to include the date of instruction; the duration, name of the person giving the instruction, names of persons receiving the instruction; and the nature of the instruction and / or, drill.

Appendix 8 – CF - 07 FIRE SAFETY TRAINING RECORD

Date: _____ **Duration:** _____

Given By: _____ **Session For:** _____

Subjects Covered

- ☐ The significant findings from the fire risk assessment and fire safety policies and the Fire Plan
- ☐ What to do on discovering a fire
- ☐ How to raising the alarm, including the locations of fire break glass points
- ☐ The action to take upon hearing the fire alarm
- ☐ The evacuation procedure for alerting guests, residents and visitors including, where appropriate, directing them to exits and assembly points at a place of total safety
- ☐ The arrangements for calling the fire and rescue service
- ☐ The location and, where appropriate, the correct use of portable fire extinguishers and fire-fighting equipment
- ☐ Knowledge of escape routes including stairways and especially those not in regular use
- ☐ How to open all emergency exit doors
- ☐ The appreciation of the importance of fire doors, keeping them closed and not wedged open to prevent the spread of smoke and heat, keeping escape routes unobstructed
- ☐ Where appropriate, isolating electrical power, gas supplies, stopping machines and processes
- ☐ The reasons for not using lifts (except those specifically constructed as evacuation lifts)
- ☐ The safe use, risks from storing and working with highly flammable/ explosive substances
- ☐ General fire precautions, fire awareness and good housekeeping practices
- ☐ The no smoking policy (where applicable)
- ☐ Special provisions for assisting disabled people and any training needed
- ☐ Identifying fire hazards and fire incidents reporting procedures; and
- ☐ Equipment fault reporting procedures.

Names of those attending:

PRINT NAME	SIGNATURE

I confirm that I have delivered the above subjects to those named above as attending.

Name: _____ **Date:** _____

Signed: _____ **Position:** _____

Appendix 9 –

Appendix 9 – CF - 05 FIRE SAFETY AUDIT CHECKLIST

	YES	NO	N/A	COMMENTS
Daily Checks (not normally recorded)				
Escape Routes				
Can all fire exits be opened immediately and easily?				
Are fire doors clear of obstruction?				
Are escape route clear?				
Fire Warning Systems				
Is the main indicator panel showing “normal”?				
Are alarms / sirens / sounders in their correct place?				
Escape Lighting				
Are lights and exit signs in good condition?				
Is the emergency lighting and signs working normally?				
Firefighting Equipment				
Are all fire extinguishers in place?				
Are all fire extinguishers clearly visible?				
Are all fire hydrants accessible for the fire service?				
Weekly Checks				
Escape Routes				
Do all emergency fastening devices work correctly?				
Are fire doors clear of obstruction?				
Are all external escape routes clear?				
Fire Warning Systems				
Did the fire alarm work correctly when tested?				
Did staff and all others hear the alarm working?				
Did any linked fire protection system operate correctly?				
Escape Lighting				
Are charging indicators visible and illuminated?				
Fire fighting Equipment				
Are all fire fighting equipment in working order?				
Are all fire extinguishers mounted 1 - 1½ metres?				
Monthly Checks				
Escape Routes				
Are all door seals and intumescent strips in good condition?				
Are all external stairs in good condition and non-slip?				
Do all internal fire doors close against their rebate / stop?				
Escape Lighting				
Do all lights and exit signs working when tested?				

Are emergency generators working correctly?				
Firefighting Equipment				
Is the "pressure" in stored pressure extinguishers correct?				

Six Monthly Checks

General				
Has the emergency evacuation lift (if fitted) been tested?				
Have sprinkler systems been tested by a competent person?				
Have release and closing mechanisms on fire resisting compartment doors and shutters been tested?				
Fire Warning Systems				
Has the system been checked by a competent person?				
Escape Lighting				
Do all lights work for a third of their rated value?				

Annual Checks

Escape Routes				
Do all fire doors work correctly?				
Is escape route compartmentation in good condition?				
Fire Warning Systems				
Has the system been checked by a competent person?				
Escape Lighting				
Do all lights operate on test for their full duration?				
Has the system been checked by a competent person?				
Firefighting Equipment				
Has all equipment been checked by a competent person?				

Miscellaneous

Have dry / wet risers been tested by a competent person?				
Has smoke control systems been tested by a competent person?				
Has external access for the fire and rescue service been checked for availability at all times?				
Have any fire fighters switches been tested?				
Are fire assembly points clearly indicated by signs?				

Fire Plan Checks Daily

Is the Fire Plan available to all site staff?				
Are the waste stockpiles at required size?				
Are fire breaks and quarantine areas clear?				
Is the 1m freeboard clear?				
Has loose waste been cleared?				

Appendix 10 –

Appendix 11 –

Appendix 8 EMERGENCY ACTIONS

THIS PLAN WILL BE ACTIVATED WITHOUT DELAY WHEN
• A fire is confirmed on site • An uncontrolled event occurs which could reasonably be expected to lead to a fire on site • A major accident is an occurrence (including in particular a major emission, or explosion) resulting from uncontrolled developments in the course of the operations, and leading to serious dangerto human health or the environment, immediate or delayed, inside or outside the establishment.

THE FOLLOWING PEOPLE WILL BE RESPONSIBLE FOR ACTIVATING THE PLAN
Ryan Eastwood – Director Site Manager / Authorised Person

HOW THE PLAN WILL BE ACTIVATED
A member of RGE Recycling Limited staff from the above list will make a 999 telephone call to each of the relevant emergency services. Note that the order in which each service is called will be dependent on the nature of the incident. Emergency Services 999 Environment Agency 0800 80 70 60 Waterboard 0330 3030368 County Council 03000414141
Strood Fire Station 01634722375
Medway Police Station 01634891055
When making each '999' call staff should provide the following information: • RGE Recycling, Royal Eagle Close, Rochester, Kent, ME2 4NF • the National Grid Reference for the site: TQ7534169619' (the site entrance) • Details of the Incident • If any staff are known to be reported missing • Where the arriving first responders will be met (in a safe location, away from any smoke plume with all relevant information on the details of the incident and a copy of this plan)

Appendix 12 –

RGE Recycling – Spillage Procedure

1. Purpose

To ensure that all spillages (oil, fuel, hydraulic fluids, battery acid, coolants, or other hazardous substances) are dealt with promptly, safely, and in compliance with environmental regulations.

2. Responsibilities

- All Employees – must report and respond to any spillage immediately.

- Site Supervisor – ensures spillages are contained, cleaned, recorded, and reported.

- Environmental Manager – oversees disposal of contaminated materials and maintains spillage records.

3. Immediate Actions in the Event of a Spill

1. Stop Work Safely – Cease operations in the affected area. Eliminate sources of ignition if fuel or flammable substances are involved.

2. Raise the Alarm – Notify the site supervisor immediately. If the spillage presents an immediate danger (fire, chemical reaction, or health hazard), initiate emergency evacuation procedures.

3. Assess the Spill – Identify the substance (oil, fuel, coolant, battery acid, etc.). Estimate size and potential impact (minor, moderate, major).

4. Containment and Control

• Small Spills (under 20 litres) – Use spill kits, absorbent pads, or granules. Prevent entry into drains, soil, or watercourses.

• Large Spills (over 20 litres) – Create barriers with spill booms, absorbent socks, or sand. Stop source of leak if safe to do so. Call for additional assistance (fire service if uncontrolled or entering water).

• Battery Acid or Chemical Spills – Use acid-neutralising absorbents. Avoid direct contact – wear chemical-resistant PPE.

5. Clean-Up Procedure

1. Collect used absorbent material and place in labelled, sealed containers.

2. Remove contaminated soil, if applicable, and store for correct disposal.

3. Clean hard surfaces with appropriate cleaning agents.

4. Dispose of waste via licensed hazardous waste contractor.

6. PPE Requirements

- High visibility vest/jacket

- Safety boots

- Gloves (oil-resistant or chemical-resistant as appropriate)

- Safety goggles / face shield for acid or chemical spills

- Respiratory protection if fumes are present

7. Reporting and Documentation

• Record all spillages in the Spillage Log (date, time, material, quantity, cause, actions taken).

• Report significant spills to the Environment Agency if there is risk of pollution.

• Conduct an investigation for major spills to prevent recurrence.

8. Prevention Measures

• Regular equipment maintenance to prevent leaks.

• Secondary containment for fuel and oil storage.

• Spill kits located at all high-risk areas (workshop, fuel store, battery storage).

• Staff trained annually on spill response.

Important: Any spillage that enters a drain, watercourse, or leaves site boundaries must be reported immediately to the Environmental Manager and the Environment Agency.

Appendix 13 –

PVC Inflatable Sealing Bags

Product Specification

The answer to a variety of pipe sealing problems.
Range available for pipe diameters from 25mm to 450mm.
Easily inflated for trouble free pipe sealing.
Ideal for use in areas where access is smaller than the test diameter.
Extension hose available to facilitate remote sealing.

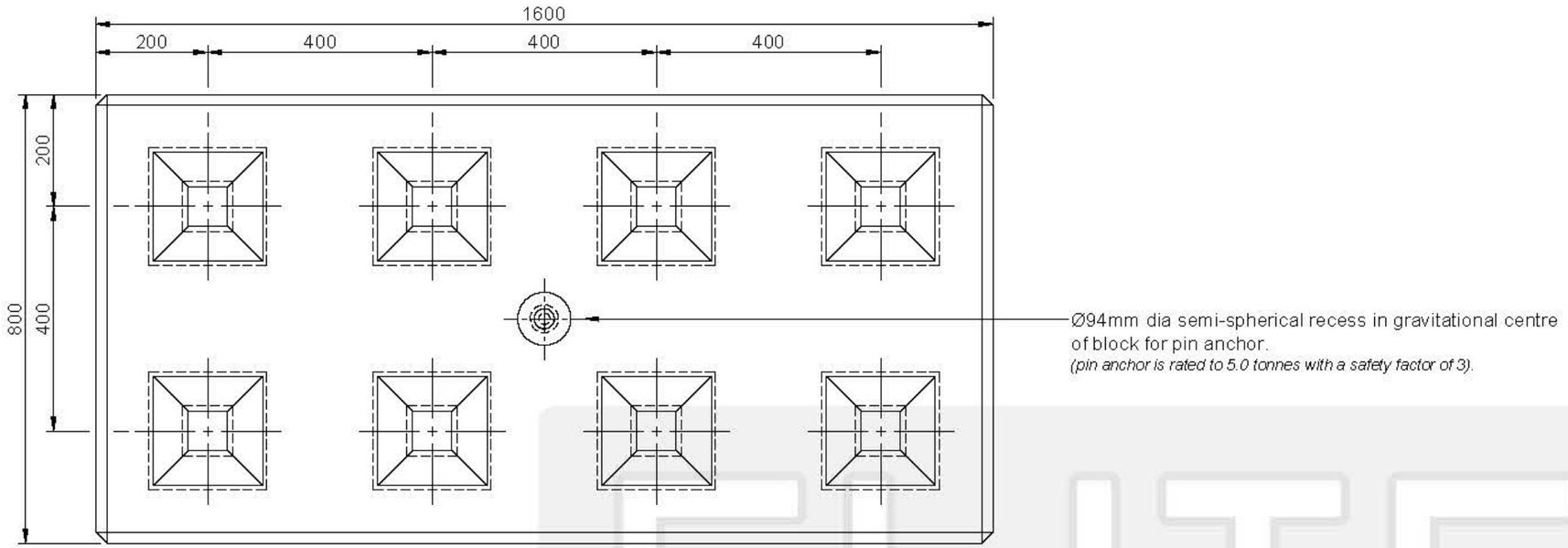
PVC Bags are supplied with 1.2mtr or 3mtr hose as standard, but can be manufactured with longer hose to facilitate remote sealing when required.

To create an air tight seal in pipes for a back pressure of 4"/100mm U Gauge, as requested by British Standards.

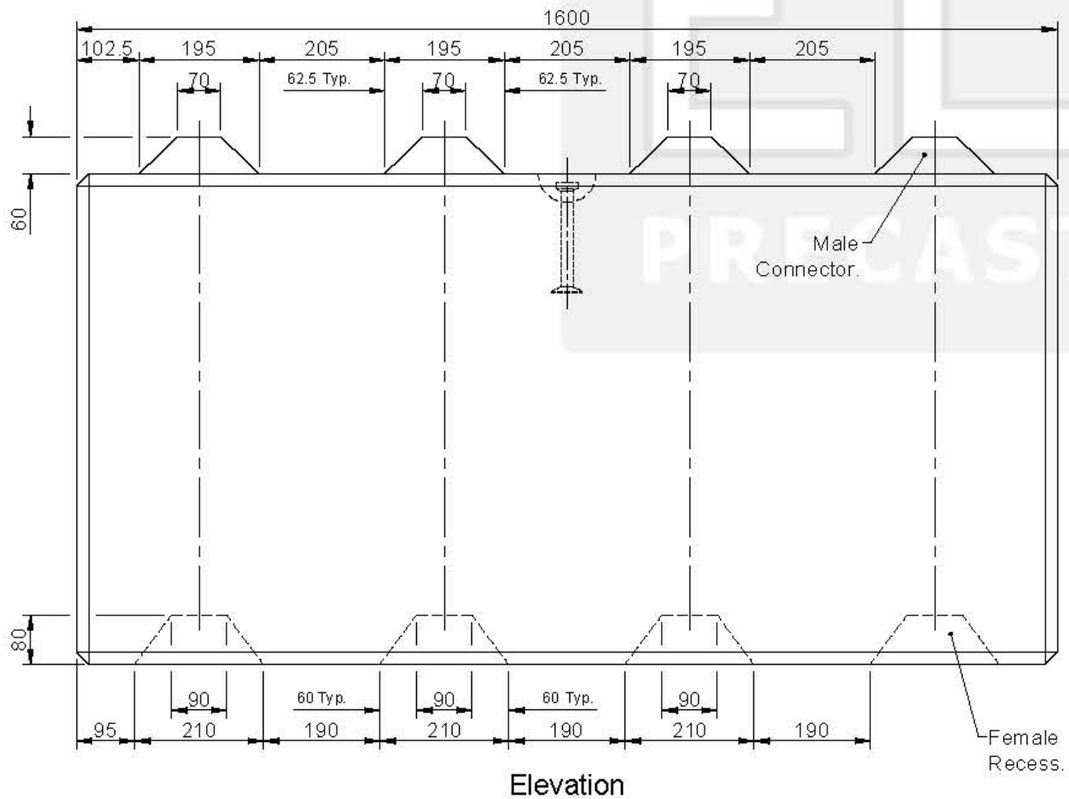
PVC AIR BAGS ARE INFLATED WITH A HAND PUMP HOROBIN CODE 84011

Part No.	Pipe Size Internal Nominal Diameter		Will Fit Pipes With Internal Diameter		Minimum Insertion into Pipe	Overall length	Contact length	Diameter of waterway	Maximum allowable back pressure	Approx. Weight
	Metric	Imperial	Minimum	Maximum						
83005	40mm	1 1/2	30mm	45mm			100mm		10p.s.i.	0.20kgs
83011	50mm	2	45mm	60mm			100mm		10p.s.i.	0.22kg
83021	75mm	3	70mm	85mm			80mm		10p.s.i.	0.24kg
83031	100mm	4	90mm	110mm			80mm		7p.s.i.	0.3kg
83051	150mm	6	140mm	160mm			100mm		7p.s.i.	0.7kg
83061	200mm>300mm	8	200mm	300mm			200mm		5p.s.i.	1.15kgs
83071	350mm>450mm	14	350mm	450mm			300mm		2p.s.i.	2.4kg

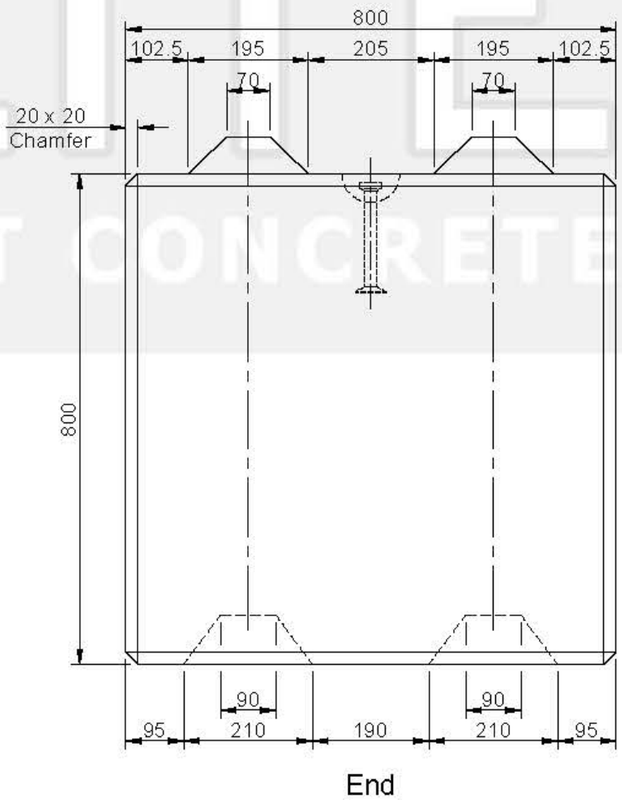
Appendix 14 –



Plan



Elevation



End

1. Handling

- Unit Volume / Weight

Unit Ref	Volume (m³)	Weight (kg)
LG8	1.015	2400

- Weight is based on 2350 kg/m³
- Lifting system is by means of a 180mm long spherical pin anchor rated at 5.0 tonnes with a safety factor of 3.
- Lifting is achieved by use of a 5.0t rated pin anchor ring clutch or combination ring clutch only and should comply with the Lifting Operation & Lifting Equipment Regulations 1998 (LOLER).

2. Concrete

- Characteristic 28 day cube strength = 50 N/mm² min.
- Concrete is Class A1 Fire Resistant in accordance with clause 4.3.4.4 of EN 13369.

3. Manufacture

- Manufactured to : BS EN 13369 : 2013
- Tolerances to : BS EN 13670 : 2009

4. Physical & Chemical Properties

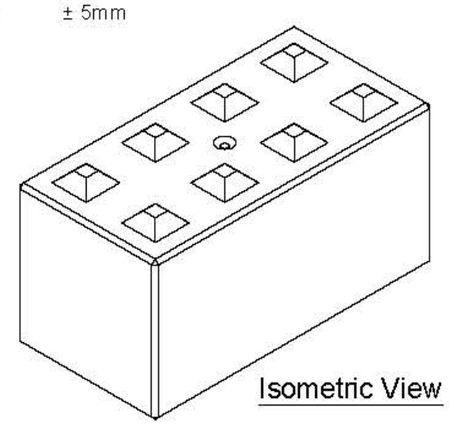
- Appearance : Grey in Colour
- Other Chemical Properties : Not Applicable

5. Design

- Design Life : >100 years

6. Manufacture Tolerances

- Length ± 5mm
- Width ± 5mm
- Height ± 5mm



Isometric View

REV	DATE	REASON FOR ISSUE	DRN	APP
A	03.01.18	Drawing revised & updated.	CTC	RMD
O	23.06.16	For Information.	CTC	RMD

TITLE

Legato™ Interlocking Concrete Block
1600 x 800 x 800mm (M / F Interlocks)
Elite Product Code : LG8

DRN CTC | CHKD RMD | DATE 23-06-16

ELITE PRECAST CONCRETE LTD
HALESFIELD 9, TELFORD
SHROPSHIRE TF7 4QW

SIZE A3 | SCALE 1:10 | DRG EPC-LEG-008 | REV A

N:\Drawings\AutoCAD Files\ICB - Legato\EPC-LEG-008_A - 1600 x 800 x 800 (LG8).dwg