

FIRE PREVENTION PLAN

St Michaels Close, Aylesford, Kent, ME20 7XE

Elliot Environmental Drainage Limited

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THIS DOCUMENT IS DUE FOR REVIEW IN **FEBRUARY 2028** OR AS A RESULT OF ANY INCIDENTS WHICH MAY LEAD TO THE REQUIREMENT FOR IMMEDIATE REVIEW, WHICHEVER IS THE SOONER.

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Site Information & Key Contacts List

Site Address:	St Michaels Close, Aylesford, Kent, ME20 7XE		
Site Operator:	Elliot Environmental Drainage Limited	National Grid Ref:	574503, 159085
Contact	Description	Office Hours	Out of Hours
Elliot Environmental Drainage Limited	Permit Holder	0844 809 9965	tbc
Maidstone Hospital, Hermitage Lane, Maidstone, Kent, ME16 9QQ	Local NHS Hospital (Main)	01622 729000	999
	Accident & Emergency (A&E)	999	999
Dr Pile N R & Partner, White House, Mackenders Lane, Eccles, Aylesford, Kent, ME20 7HX	Local Doctor Surgery (GP)	01622 718558	999 or 112
Kent Police Maidstone Police Station, 7 Lower Stone St, Maidstone, ME15 6LL	Local Police Non-Emergency	0845 113 5000	999 or 112
	Police Emergency	999 or 112	999 or 112
Larkfield Fire Station New Hythe Lane, Aylesford, ME20 6PP	Fire and Rescue Service (in Emergency Dial 999)	01622 692121	999 or 112
Environment Agency Orchard House, Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH	Environmental Regulator	0370 850 6506	0800 80 70 60
Maidstone Borough Council Maidstone House, King Street, Maidstone, Kent, ME15 6JQ	General Enquiries	01622 602000	101, 999 or 112
South East Water Rocfort Road, Snodland, Kent, ME6 5AH	Mains water supplier	0333 000 0002	0333 0000365
Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX	Sewerage	03303030277	999 or 112
Oaktree Environmental Ltd - Lime House, 2 Road Two, Winsford, Cheshire CW7 3QZ	Secondary specialist waste and permitting compliance advisors	01606 558833	N/A

1 Introduction

1.1 Overview of site operations

1.1.1 This document considers the risks associated with fire on site at St Michaels Close, Aylesford, Kent, ME20 7XE and all necessary measures required to be put in place to ensure the risk of fire at the site is kept to an absolute minimum.

1.1.2 The company are specialists in the collection and treatment of non-hazardous and hazardous wastewater from site drainage systems and oil water interceptors and road sweepings.

1.2 Fire Prevention Objectives

1.2.1 This Fire Prevention Plan (FPP) has been designed to meet the following objectives:

- To minimise the likelihood of a fire happening;
- To aim for a fire to be extinguished within 4 hours;
- To minimise the spread of a fire within the site and to surrounding neighbouring sites;
and,
- To minimise impact of fire on people, environment, and businesses.

1.3 General site information

1.3.1 In addition to this document the site will be operated in accordance with an Environmental Management System (EMS).

1.3.2 The operational layout of the site is shown in Appendix I

1.3.3 This FPP document will be kept in the site office and all operational staff must be aware and understand the contents of the Fire Prevention Plan (FPP) and what they must do during a fire.

1.4 Staffing and Management

1.4.1 The table below details the minimum staff structure of the site which is required in order for operations to comply with this FPP. Only the site manager, machine/plant operators and general operatives will be permitted to tackle fires on-site.

Position	Employees	Responsibilities
Site Manager	1	Ensuring that the site is being operated in accordance with the Environmental Permit
WAMITAB Holder	1	Ensuring that the site is being operated in accordance with the Environmental Permit
HSEQ Manager	1	Health and Safety management
Stores manager	1	Ensuring that the site is being operated in accordance with the Environmental Permit
Lead plant operator	1	Ensuring that plant is being used correctly. Waste handling/processing, reception, and plant operation.
Machine / Plant Operators / General Operatives	>1	Waste handling/processing, reception, and plant operation.

1.4.2 All site staff and contractors must be aware and understand the contents of the FPP and what they must do during a fire.

1.5 Plant and equipment

1.5.1 Waste will be handled using the plant listed below. Only trained operators will be permitted to drive/operate the plant listed below. Any changes to the list will be notified to the EA prior to implementation.

Item	Number	Function
Telehandler	1	Waste loading/moving/sorting
Excavator	1	Waste loading/moving/sorting
CDE Hydro tip & G:Max	1 / 1	Waste reception, dewatering, screening
Wet waste treatment plant comprising tanks, flocculator, DAF, centrifuge etc..	1	Treatment of wet wastes

Note: The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.

1.6 **Hours of operation**

1.6.1 The site will be open during the following hours for the delivery and receipt of waste on site; including depositing, sorting, moving, storing and removing waste:

Monday to Friday	24 hours
Saturdays	24 hours
Sundays and Bank Holidays	No operations

1.6.2 The only activities on site which will be permitted outside of these hours are maintenance works, situations where waste is brought in for deposit in emergency situations and general office use.

1.7 **Correspondence with Fire and Rescue Service**

1.7.1 The Fire and Rescue Service (FRS) were contacted in the preparation of the FPP in order to obtain fire hydrant information which is discussed in Section 10 of this document.

1.7.2 Elliot Environmental Drainage Limited will ensure all plans are suitable and seek a two-yearly response from the Environment Agency (EA) and Fire and Rescue Service (FRS) with regards to their FPP and associated operations on site. This regular correspondence will ensure all measures to prevent, mitigate and contain fires on site are up to date and deemed sufficient by the FRS.

1.8 **Sensitive Receptors**

1.8.1 A Sensitive Receptors Plan has been provided in Appendix I to highlight all main receptors within 1,000m of the site which could be affected by a fire at the site.

1.8.2 To minimise the impact on the local area and associated receptors from a fire on site, this document details mitigation measures which will decrease the likelihood of a fire occurring on site and limit the size and duration of a fire if it does occur (as per Section 1.2 above). These measures will ensure the potential impact on any of the surrounding land is as minimal as practicably possible.

- 1.8.3 The table overleaf details a risk assessment of all the receptor types within 1km radius of site, and likely impacts on each - e.g. smoke, road closures, impacts on businesses etc...
- 1.8.4 Contact details for surrounding industrial, commercial, retail and leisure premises are shown in Section 9.5 including and procedures of how receptors with human population would be notified of a fire.

Table 1.1 - Receptors and risk management

Receptor	Receptor Type	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management
Numerous industrial and commercial uses in the surrounding area	Industrial / commercial premises	Fire causing the release of polluting materials to air (smoke, fumes and particulate matter)	Respiratory irritation, illness and nuisance to local population. Financial loss of businesses due to closure of adjacent roads/evacuation of premises.	Air transport of smoke.	High	Medium	Low	Procedures set out in this FPP. Toolbox talks and liaison meetings with receptors to review procedures in the event the site is subject of a fire.
Residential dwellings	Residential	As above	Respiratory irritation, illness and nuisance to local population.	Air transport of smoke.	Medium	Medium	Low	As above
Nearby surface water	Surface waters	Direct run off of fire water across site or to surface waters. Fire causing the release of polluting materials to air (smoke, fumes and particulate matter).	Loss of amenity, deterioration of water quality, killing of flora / fauna and other local wildlife	Air transport of smoke. Direct run off of fire water across site to surface waters.	Medium	High	Low	Procedures set out in this FPP. The mixed waste recycling area has a sealed drainage system and all firewater would be contained.
Surface water and surrounding vegetation	Surface water	Direct run off of fire water across site or to surface waters. Fire causing the release of polluting materials to air (smoke, fumes and particulate matter).	Loss of amenity, deterioration of water quality, killing of flora / fauna and other local wildlife	Air transport of smoke. Direct run off of fire water across site to surface waters.	High	High	Med	Procedures set out in this FPP. The waste recycling compound has a sealed drainage system and all firewater would be contained on site
Woodlands (if applicable)	Protected	Fire causing the release of polluting materials to air (smoke, fumes and particulate matter).	Loss of amenity, deterioration of killing of flora / fauna, protected species and other local wildlife	Air transport of smoke.	Low	Medium	Low	Procedures set out in this FPP. Toolbox talks and liaison meetings with receptors to review procedures in the event the site is subject of a fire.
Surrounding highway network	Key transport links	Fire causing the release of polluting materials to air (smoke, fumes and particulate matter)	Closure of roads and financial loss of businesses due to closure of such roads Inability for human population to use road links	Air transport of smoke.	Medium	Medium	Low	As above

2 Managing Common Causes of Fire

2.1 Details

2.1.1 The following table outlines common causes of fire and outlines specific examples of these sources, the associated risks and any mitigation measures necessary to manage them:

Table 2.1 - Common fire sources and mitigation

Source	Risk	Magnitude of Risk / Likelihood	Brief outline of Mitigation (refer to Section 4 for storage/monitoring procedures)	Magnitude of risk / likelihood following mitigation
Arson or vandalism	Deliberate ignition of wastes by intruder(s) and/or vandalism of site infrastructure, plant and/or machinery which may give rise to malfunction or compromise the integrity of waste storage/containment measures	Medium	<ul style="list-style-type: none"> Appropriate site security infrastructure. Vehicle checks on arrival to the site. Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. Staff training / toolbox talks. 	Near-zero
Plant or equipment	Spillages of fuel, sparks from machinery or malfunction caused by ineffective maintenance	Medium	<ul style="list-style-type: none"> Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. Daily checks of site surfacing and spill kits. Staff training / toolbox talks. 	Near zero
Electrical appliances and cabling	Faulty appliances or damaged/ exposed electrical cables may spark as a result of a power surge	Medium	<ul style="list-style-type: none"> Fixed wiring testing is carried out 5 years and portable appliances are PAT tested 12 months in accordance with Legislation. Daily checks for dust and fluff on wiring / electrical appliances. 	Low
Discarded smoking materials	Risk of ignition of stored wastes from smoking materials which have not been fully distinguished	Low	<ul style="list-style-type: none"> No smoking or e-cigarettes allowed on site 	Near-zero
Sparks from loading buckets/shovels	Scraping of loading buckets/shovels causing sparks which may ignite stored wastes	Low	<ul style="list-style-type: none"> Fire extinguishers are fitted in the cab of all loading plant. Staff training / toolbox talks. Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. 	Low
Hot works	e.g. welding, soldering, cutting, etc. which involve the use of high temperature equipment which may be a source of both primary and residual heat to stored wastes	Medium	<ul style="list-style-type: none"> Currently no hot works carried out on site. In the event that hot works are carried out on site, they will only take place on site under a hot works permit 	Low
Industrial heating	Industrial heaters and/or pipework used to heat internal and external areas on site which may, in turn, supply heat to stored wastes increasing the risk of combustion	Low	<ul style="list-style-type: none"> There are no industrial heaters on site 	Low
Hot exhausts	Potential source of both primary and residual heat to stored wastes	High	<ul style="list-style-type: none"> Fire extinguishers are fitted in the cab of all loading plant. Staff training / toolbox talks for continuous monitoring throughout the day to detect signs of a fire caused by dust settling on hot exhausts and engine parts. Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. Storage of plant & equipment away from combustible or flammable wastes. Daily checks for dust and fluff on plant/equipment before and use of equipment. 	Low
Build-up of loose combustible waste, dust and fluff	Light waste and ambient particulates with high combustibility settling and building up in key areas in and around plant/machinery and around exhausts	High	<ul style="list-style-type: none"> Fire extinguishers are fitted in the cab of all loading plant. Staff training / toolbox talks for continuous monitoring throughout the day to detect signs of a fire caused by dust settling on hot exhausts and engine parts. Plant & equipment daily checks and preventative maintenance of plant / equipment by manufacturer. Minimum daily checks for dust and fluff on plant/equipment before and use of equipment at the start/end of each working day. 	Low

Source	Risk	Magnitude of Risk / Likelihood	Brief outline of Mitigation (refer to Section 4 for storage/monitoring procedures)	Magnitude of risk / likelihood following mitigation
Hot loads	Imported wastes which may contain materials which are above ambient temperature	High	<ul style="list-style-type: none"> All loads are inspected in accordance with strict waste acceptance procedures. Quarantine area and rejected waste containers on site for quick isolation of load. 	Low
Overhead power lines	Any overhead power lines on or around the site may ignite in the event of a fire and worsen the effects	Low	<ul style="list-style-type: none"> There are no overhead power lines which traverse the site. 	Near-zero
Ignition sources	Activities or appliances which use a source of both primary and residual heat to treat waste or manufacturer material or plant/equipment	Medium	<ul style="list-style-type: none"> Hot works procedures implemented prior to any hot works. There are no space heaters, furnaces, incinerators, and sources of ignition will be kept 6 metres away from combustible and flammable waste. 	Low
Batteries within waste deposits	Ignition of stored wastes via batteries within imported wastes	High	<ul style="list-style-type: none"> All loads are inspected in accordance with strict waste acceptance procedures to ensure no batteries are accepted at the site. Quarantine area and rejected waste containers on site for quick isolation of load containing batteries. 	Medium
Other combustible non-waste materials on or near the site not mentioned above i.e. gas cylinders / LPG tanks	Any combustible non-waste materials on or near the site may ignite in the event of a fire and worsen the effects	High	<ul style="list-style-type: none"> All loads are inspected in accordance with strict waste acceptance procedures. Quarantine area and rejected waste containers on site for quick isolation of load. 	Low
Reaction between wastes	Combustible waste piles may ignite in the event of a fire and worsen the effects if wastes react	High	<ul style="list-style-type: none"> All loads are inspected in accordance with strict waste acceptance procedures. Quarantine area and rejected waste containers on site for quick isolation of load. 	Low
Leaks and spillages of oils and fuels	Fuels and combustible liquids leaking or trailing from site vehicles and ELVs can combust or cause accidents leading to combustion	High	<ul style="list-style-type: none"> Spill kits available throughout the site. Suitable drainage system. No ELVs accepted into the site Minimum daily checks for spillages around the site. Staff training / toolbox talks. 	Low
"Tramp" metal	Metal could be hot from mechanical processing and interact with lighter waste causing a fire	High	<ul style="list-style-type: none"> There are no current proposals for acceptance or mechanical treatment of scrap metal. 	Low

2.2 **Fuel Storage**

2.2.1 The location of fuel/oil storage (if applicable) will be shown on the Layout Plan and the following procedures will apply:

- Tanks will be surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipework and associated infrastructure will be enclosed within the bund.
- A lock will be fitted to the tank valve to prevent unauthorised operation.
- All valves and gauges on the bund will be constructed to prevent damage caused by frost.
- No combustible waste will be stored within 6 metres of the tank.
- The tanks will be clearly marked showing the product within and also its capacity.

2.3 **Other hazardous (non-waste) material storage**

2.3.1 The site will not routinely store gas cylinders or aerosols on site. In the event the site needs to store any of these materials they will be stored in accordance with Health and Safety requirements.

2.3.2 Activated carbon will not be stored at the site. All chemicals utilised in the treatment plant will be stored inside Building 1 as detailed on the Layout Plan, chemical storage will be in line with the relevant COSHH regulations, all storage areas will be sufficiently labelled. Material Safety Data Sheet (MSDS) will be held for all relevant chemicals stored at the site.

2.4 **Hot works**

2.4.1 Whilst hot works are not routinely carried out on site, the site will implement the following procedures in the event that hot works are carried out (i.e. welding/cutting/etc.):

- a) Check that hot work is required or could you use an alternative (drill and bolt etc).
- b) All hot works must be carried out with a significant stand-off from other stored materials and/or wastes on site (i.e. 6 metres).

- c) Ensure the area is cleared of all flammables.
- d) Ensure you have TWO fire extinguishers to hand. The type would depend on your working environment but generally a CO₂ and a Powder extinguisher would be suitable.
- e) Ensure you have used screens to shield bystanders from sparks and welding flash.
- f) Ensure you have an observer to watch over you and check for sparks while you work
- g) When you are ready to set up you will need to get a key to unlock the equipment from site management.
- h) When you are set up you must get the site supervisor or manager to check your preparation.
- i) If they are happy, they will sign your permit which should be displayed, and you can proceed.
- j) During cutting/welding your observer should remain with you at all times and be constantly checking the area for sparks or signs of fire.
- k) When the work is complete a fire watch will be undertaken to check for fire and to ensure that all looks OK, note the time the hot work finished on the permit.
- l) Check again for fire for at least 30 minutes and, if all is clear, the permit must be signed off. This would usually be by the person who authorised it.
- m) Hot work requires one permit per person for each day.

2.4.2 It is important to note a final fire watch will take place prior to cessation of any hot works and cessation of activities at the end of Saturday prior to closing the site on Sunday.

2.5 **Smoking Policy**

2.5.1 Smoking is not prohibited on the site. Any persons found smoking will be evicted from the premises.

2.6 **Mobile and fixed plant maintenance**

2.6.1 All mobile & fixed plant on site including vehicles in the fleet are subject to annual manufacturer/specialist maintenance to ensure proper working order in the form of service contracts.

- 2.6.2 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day using a checklist similar to that in Appendix II to ensure the following:
- a) Machinery is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
 - b) Mobile plant which is not in use will be stored at least 6 metres from any stored combustible wastes on site or other potentially flammable materials following cessation of daily waste management activities. The location of the mobile plant storage area is detailed on the Layout Plan.
 - c) In the building, all plant will be powered-down and completely shut off prior to cessation of operations on any given day.
 - d) Plant which is not in use for any extended period is stored at least 6 metres from combustible waste.
 - e) All plant and equipment vehicles are fitted with fire extinguishers in the cab. Rubber strips are not considered appropriate as they are usually removed via uneven and bumpy ground.
 - f) Dust from processing/treatment operations on site can settle throughout the working day onto processing plant, plant exhausts and engine parts so a fire-watch will be implemented after cessation of works and equipment powered down for 1 hour each day to remove any dust/fluff using brushes, hoses etc... Any build of dust/fluff will be removed from the equipment and deposited into a container to await removal from site and site management informed.

2.7 **Site Security**

- 2.7.1 The site will be appropriately secured with the use of steel access gates and palisade fencing to approximately 1.8m in height and Close Circuit Television (CCTV). The site also benefits from security gates which will be locked when the site is closed. As part of the required secondary containment, the site is also required to construct concrete walling around sections of the facility with the southern and eastern boundaries of the site predominantly comprising 1.2m high concrete block walls with a heavily vegetated area beyond which will provide additional security. Site infrastructure is detailed on the Layout Plan.

Out-of-hours monitoring:

- 2.7.2 The CCTV system is monitored out-of-hours by an external monitoring company who have site management and staff members contact details who they contact in the event of an emergency i.e. security breach or fire. The location of CCTV and directional view is detailed on the CCTV Location Plan. During operational hours, the site will be continuously monitored by operational staff who will be trained to act quickly in a fire event.
- 2.7.3 In addition to the above infrastructure, the site will have nominated staff who have access to all areas of the site and live within 15 minutes of the site, these nominated staff can be contacted in the event of any emergency by either the external monitoring company or operator and attend the site within 15 minutes to assist in firefighting, they will also be able to immediately contact the Local FRS to attend the site.
- 2.7.4 The above measures ensure that the site is monitored out-of-hours, and that nominated staff can act quickly in the unlikely event of a fire. It is important to note, that whilst the site is not typically operational on Sunday, the operator will have provision for the acceptance of emergency loads, therefore, on occasion, there may be staff members present during Sunday who can monitor the site.
- 2.7.5 The site security will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired to the same or better standard within a suitable timescale. All repairs will be noted on the site diary repaired as soon as practically possible. The checklist in Appendix II provides further information.
- 2.7.6 If unauthorised access becomes apparent as a problem at the site, the security measures will be reviewed, and improvements implemented.

2.8 Electrical Faults or Damaged/Exposed Electrical Cables

- 2.8.1 All fixed wiring electrical cabling on site will be inspected daily by staff and serviced in accordance with the relevant legislation (3/5 years) by fully qualified and certified electrical contractors to undertake both Planned Preventative Maintenance and Reactive Maintenance (under contract) of the following:

- a) Fire detection & alarm system;
- b) Emergency lighting;
- c) Machinery checks / services (as per manufacturers' instructions).

2.8.2 In terms of portable appliance testing (PAT), this will be conducted annually by qualified and certified electrical contractors.

2.8.3 Daily inspections of cabling, etc. will be undertaken and the daily Fire Checklist can be used as a reference. Any potential ignition sources from suspected electrical faults will be isolated and the appointed electrical contractors will be contacted immediately to rectify the situation. Where possible, staff will immediately remove any stored wastes from the vicinity of the fault area or cable traverse if safe to do so.

3 Pre-acceptance & Waste Acceptance Procedures

3.1 Pre-acceptance procedures

- 3.1.1 All available information in respect of each waste stream including any chemical analysis (as applicable) will be reviewed in order to verify that waste is coded correctly as part of pre-acceptance procedures.
- 3.1.2 Waste assessment comprising stringent pre-acceptance checks will be carried out on all routine loads upon collection and prior to them entering the site. This will include, but is not limited to, visual and olfactory checks of the load for any signs of contamination and/or non-conforming materials. If during the inspection there is evidence of visual or olfactory contamination that renders the load unsuitable for processing, the material may be rejected. The customer may also be informed to dispose or recover the material at an alternative suitably licensed facility.
- 3.1.3 Prior to acceptance, all loads will be reviewed and booked in on the electronic system or spreadsheet maintained by the Site Operator to ensure that the company has a general idea of the load composition and obtain details of the load i.e. physical properties and assigned European Waste Catalogue (EWC) code.
- 3.1.4 Prior to receipt of waste at the site, the source of the waste will be required to provided, including the following:
- a) the waste producer (i.e. site name address and contact details);
 - b) the source and nature of the waste, at the point of production;
 - c) a description of the waste including its physical form;
 - d) the full characteristics of the waste including the variability and reactivity (if relevant);
 - e) a description of any odour potential;
 - f) the type of packaging and risks of contamination;
 - g) an estimate of the quantity; and,
 - h) the age of the waste.

3.1.5 Pre-acceptance documentation will be retained for a period of 3 years following receipt of a load. The potential odours and emission risks will be reviewed and considered prior to acceptance to ensure that suitable handling and storage procedures are implemented at the site.

3.1.6 Upon collection of a new waste stream, a sample will be taken and sent off for testing.

3.2 **Waste Acceptance Procedures**

3.2.1 Strict waste acceptance procedures are in place at the site as shown below.

3.2.2 Loads will be inspected again upon entering the site using the same visual and olfactory checks as previously mentioned. All incoming vehicles upon arrival are required to report to the person in charge of waste acceptance at the site. The details of the load will be recorded, and the duty of care note, and company documentation will be further checked by the operator to ensure that the load is acceptable at the site, including a visual check prior to the vehicle proceeding to the tipping area. Any deviation from the procedures or problems with any loads will result in tipping facilities being suspended for the offending company. Loads which are not acceptable within the above terms will be rejected.

3.2.3 It can sometimes be difficult to inspect a load prior to tipping, so material will be inspected during unloading activities so that any non-conforming materials can be identified, removed and transferred into the quarantine area or rejected waste container and recorded on a rejected waste form. Evidence of all waste assessment (in line with WM3) will be documented and be accompanied with the relevant duty of care note/company documentation.

3.2.4 Any waste arising from the waste producer or contractor will be assessed and classified in accordance with the guidance set out in WM3. The operator will require confirmation of the WM3 assessment and be provided with the accompanying waste transfer note or Hazardous Waste Consignment Note (HWCN) describing the physical and chemical composition, hazard characteristics and handling precautions, compatibility issues and information to specify the original waste producer and process.

3.2.5 The characterisation period detailed in the section above will help the site identify the composition of waste to inform the risk basis for the waste acceptance criteria and ongoing receipt, this may consider the following:

- a) the source and nature of waste;
- b) hazardous properties within the waste;
- c) potential risks associated with the waste i.e. odour and other relevant emissions; and,
- d) knowledge of the waste producer and age of the waste.

3.2.6 If there is visual or olfactory evidence that wastes have been mis-classified as non-hazardous or mis-coded by the waste producer, the waste will be quarantined in a sealed area pending further testing to ensure suitability for acceptance at the site. If there are any hot load or incompatible wastes identified during waste acceptance checks, the waste will be quarantined in a sealed area pending removal off site to a suitably licensed facility.

4 Managing waste piles and material

4.1 General

- 4.1.1 All waste stored on site will comply with Section 9.1 of the EA's FPP guidance.
- 4.1.2 The operator will minimise pile sizes and store waste materials in their largest form as shown below.

4.2 Waste storage table

- 4.2.1 The following table details the maximum storage volumes and duration for combustible wastes stored on site.

Table 4.1 - Combustible waste storage table

Storage Area Details Table - Represents the volumes of waste which may be stored at the site													
Plan Ref	Description	Storage form/ containment	Height & width of firewall (m)	Max Width (m)	Max Length (m)	Operational storage height (m)	Out-of-hours storage height (m)	Approx. area (m ²)	Conversion factor used	Approx. Operational Volume (m ³)	Out of hours Volume (m ³)	Max Duration of storage (worst case scenario)	Comments
N/A	Non-hazardous or hazardous waste storage area 1 comprising material stored in containers, bins, skips, IBCs and drums.	Stored within containers, bins, skips, IBCs and drums.	Concrete wall of building	N/A	N/A	1m or height of container	1m or height of container	N/A	1	10m ³ (10 tonnes)	10m ³ (10 tonnes)	<7 days	Building open fronted to allow for access Containers accessible from the top to allow for access Material will be bulked up and removed once area is full.
	Non-hazardous or hazardous waste storage area 2 comprising material stored in containers, bins, skips, IBCs and drums.	Stored within containers, bins, skips, IBCs and drums.	Concrete wall of building	N/A	N/A	1m or height of container	1m or height of container	N/A	1	10m ³ (10 tonnes)	10m ³ (10 tonnes)	<7 days	Building open fronted to allow for access Containers accessible from the top to allow for access Material will be bulked up and removed once area is full.
Conversion factors for waste piles are worked out using the following methods set out by The Environment Agency													
Conversion of 1 for materials stored within containers, area of storage in stackable containers and waste/bale stacks													
Conversion of 0.6666 for waste stored within a bay													
Conversion of 0.3333 for free standing stockpile													

4.3 Free Standing Piles

4.3.1 The tables below detail the combustible waste stored on site and procedures to reduce the risk of the waste combusting and reference should be made to Layout Plan for details of the waste storage areas.

4.4 Waste Storage

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
Non-hazardous or hazardous storage area 1 comprising material stored in containers, bins, skips, IBCs and drums.	<ul style="list-style-type: none"> • This storage area is utilised for the storage of non-hazardous or hazardous materials and liquids which will be stored in a mixture of containers, bins, IBCs and drum, the area is located within a bunded building on an impermeable surface. • The use of containers, bins, IBCs and drums creates adequate segregation between the different types of wastes and ensures that there will be no cross-contamination of waste streams. • All the waste will have been subject to pre-acceptance checks prior to acceptance at the site and waste acceptance checks when material enters the facility, it's therefore considered that the waste is unlikely to contain any hot loads or incompatible waste which could lead to a spark or overheating causing a fire. • All material will be accessible from either one side or from the top to ensure that material can be accessed during a fire event. • As material is stored in container and not loose, it can be easily dragged to the quarantine area during a fire event to reduce the overall spread of the fire and reduce the total volume of the storage area. This also allows containers to be easily accessible to fight a fire. • Stock rotation – The maximum duration of waste stored here will be less than 7 days which the guidance permits. • The building is accessible from the front in the event of a fire occurring to allow access for fire-fighting. • All site staff will be given instructions and advised of the importance of stock rotation as part of their training. • The site is operational 24 hours a day Mon-Sat, waste piles can be visually monitored throughout the day by site operatives and out of hours by CCTV. • Outside of operational hours, the area benefits from CCTV which is monitored by an external monitoring company who will alert the operator of any incidents, the operator can then contact the FRS and any nominated staff to attend the site and begin tackling a fire.

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
Non-hazardous or hazardous storage area 2 comprising material stored in containers, bins, skips, IBCs and drums.	<ul style="list-style-type: none"> • This storage area is utilised for the storage of non-hazardous or hazardous materials and liquids which will be stored in a mixture of containers, bins, IBCs and drum, the area is located within a bunded building on an impermeable surface. • The use of containers, bins, IBCs and drums creates adequate segregation between the different types of wastes and ensures that there will be no cross-contamination of waste streams. • All the waste will have been subject to pre-acceptance checks prior to acceptance at the site and waste acceptance checks when material enters the facility, it's therefore considered that the waste is unlikely to contain any hot loads or incompatible waste which could lead to a spark or overheating causing a fire. • All material will be accessible from either one side or from the top to ensure that material can be accessed during a fire event. • As material is stored in container and not loose, it can be easily dragged to the quarantine area during a fire event to reduce the overall spread of the fire and reduce the total volume of the storage area. This also allows containers to be easily accessible to fight a fire. • Stock rotation – The maximum duration of waste stored here will be less than 7 days which the guidance permits. • The building is accessible from the front in the event of a fire occurring to allow access for fire-fighting. • All site staff will be given instructions and advised of the importance of stock rotation as part of their training. • The site is operational 24 hours a day Mon-Sat, waste piles can be visually monitored throughout the day by site operatives and out of hours by CCTV. • Outside of operational hours, the area benefits from CCTV which is monitored by an external monitoring company who will alert the operator of any incidents, the operator can then contact the FRS and any nominated staff to attend the site and begin tackling a fire.

4.4.1 **NOTE:** Whilst the areas listed in table 4.1 are 10m³ (10 tonnes) each, it is worth noting that the total combined volume in the building will only every equate to 10 tonnes in total. It is worth noting that whilst the areas in Table 4.1 are labelled as hazardous or non-hazardous storage areas, each area will only ever consist of non-hazardous or hazardous waste only and the areas are therefore interchangeable, it is also worth noting that the maximum storage capacity of Building 3 will not exceed more than 10m³ (10 tonnes) at any one time across both areas.

4.4.2 The above storage areas will also benefit from separation via a concrete block firewall to reduce any potential spread of fire, the above is detailed on the Permit Layout Plan.

4.5 **Acceptance, handling and storage of Raw Materials**

- 4.5.1 As part of the operations, the site will be required to use 2,000 litres of diesel and 4,000kg of activated carbon each year. It is worth noting that activated carbon is not stored at the site. Diesel will be stored in a purpose designed container within a bunded storage area.
- 4.5.2 As part of the process chemicals will be utilised and stored at the site, these will be stored in bunded storage in suitable corrosive resistant containers and/or chemical cabinets. Chemical storage will be in line with the relevant COSHH regulations, all storage areas will be sufficiently labelled. Material Safety Data Sheet (MSDS) will be held for all relevant chemicals stored at the site.
- 4.5.3 The above storage methods ensure adequate storage is implemented, it is also worth noting that containers can be easily transported into another area of the site to reduce the potential spread of a fire.
- 4.5.4 Storage locations for any chemicals and raw materials are detailed on the Layout Plan in Appendix I.

4.6 **Stock rotation and seasonal variations**

- 4.6.1 All wastes subject to the wet waste treatment plant will be loaded directly into the reception area of the plant within Building 2. Whilst not considered combustible waste, it is worth noting that external tanks are monitored with level sensors and have a residence time of up to 5 days before being released into the treatment process within Building 1 ensuring the first in, first out principle applies.
- 4.6.2 Any waste arising from the repackaging activity will be placed into the relevant containers, bins, IBC, drum etc... The material will be bulked up within the building until it reaches full capacity, once at fully capacity the material will be removed from site to a suitably licensed facility. All waste accepted into the site will be accompanied with the relevant transfer note which will be kept on file, the above procedure ensures that the first in, first out principle is implemented at the site.

4.6.3 In the event of destination site closures or seasonal demands for wastes leading to a longer storage duration, the operator can divert incoming waste and send stored waste to an alternative site. The operator can search for additional site's using the EAs public register for alternative sites who could take the load, or they would contact the destination sites where waste from the site will be sent.

4.6.4 The list of outlets has not been provided due to confidentiality purposes however the contracts will range from weekly – monthly depending on seasonal variations and demand for material.

4.7 **External heating**

4.7.1 All combustible wastes are stored within a building and are therefore not at risk of external heating.

5 Prevent fire spreading

5.1 Waste storage general / fire breaks

- 5.1.1 Combustible waste will be stored as per the Layout Plan and well within the limit of EA's FPP guidance. All stockpiles of stored wastes are detailed in the Storage Area Details table in respect of their description, maximum length and width, area, volume and storage duration. The dimensions of the piles are provided on the plan for context and are not exhaustive.
- 5.1.2 The operator will store waste materials in their largest form and minimise pile sizes wherever possible.
- 5.1.3 The aim of the site is to process the incoming material and arrange for its export off site as soon as practicably possible following sorting and processing to minimise over-stocking which in-turn minimises the risk of overheating and spontaneous combustion.
- 5.1.4 **Storage on flat ground:** Site surfaces where wastes are stored will be flat and, therefore, reduce the risk of falling materials which would accelerate the spread of fire.
- 5.1.5 Building 3 comprises the use of concrete firewalls constructed to the BS8110 Pt2 'Structural use of concrete Part 2 Code of practice for special circumstances' and BSEN1992-1-2 'Design of concrete structures. General rules. Structural fire design'. In accordance with BSEN1992, the fire resistance of concrete structures over 100mm will have a fire resistance of 1200°C for 4 hours.
- 5.1.6 The table below details the type of wall and demonstrates their properties to:
- a) Resist fire (both radiative heat and flaming); and,
 - b) Have a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within 4 hours.

Table 5.1 - Fire wall details and specifications

Firewall type	Width	Site location / use	Specification
Concrete walls or concrete blocks	0.15<	Forming the repackaging building (Building 3)	Concrete panels - Class A1 in accordance with Clause 4.3 4.4 of EN:13369 - >120 minutes

- 5.1.7 Fire walls are checked throughout the day by staff and recorded inspections undertaken on a weekly basis, if any gaps or damage to the walls are present which could compromise their integrity will be repaired and sealed as soon as practically possible.
- 5.1.8 Material will be stored adjacent to the walls of Building 3 which comprises concrete firewalls.

6 Site inspection programme

6.1 Daily checks

6.1.1 Site management are responsible for carrying out daily site walks for checking drainage systems, security measures and waste storage areas. Site management can reference the fire checklist shown in Appendix II but may use internal check sheets. The site also carries out weekly inspections for firefighting equipment to ensure they are fit for purpose.

6.1.2 Carrying out the above checks daily will keep the levels of dust, fibre, paper and other loose combustible materials, which could aid in the acceleration of a fire, on site surfaces to a minimum and ensure all containment of wastes on site are functioning effectively in accordance with the storage limitations provided in the Waste Storage Table.

6.2 Staff training

6.2.1 Operational staff will be subject to site inductions which includes basic fire emergency procedures by site management. If necessary, a third-party fire consultant will be contacted to carry out additional training.

6.2.2 A full test (drill) of the procedures detailed in the following sections and within this document will be carried out every 12 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS. The fire checklist may also be used during the drill.

6.2.3 The annual training and test drill of procedures will consider the following scenarios:

Stockpile management

6.2.4 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site. Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP for the site.

- 6.2.5 Employees in these roles must also be trained to recognise storage limits to ensure that they are in accordance with those specified in Table 4.1.

Acceptance, handling and storage of incompatible wastes & materials

- 6.2.6 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the sites EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS to ensure a suitable method for removal.
- 6.2.7 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.
- 6.2.8 All employees dealing with consignments of waste are trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.
- 6.2.9 A full breakdown of the sites Pre-acceptance and Waste acceptance procedures are detailed within the EMS.

Vehicle and plant maintenance:

- 6.2.10 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.

- 6.2.11 Training will be in accordance with this document and will be based on the preventative maintenance schedule supplied by the plant & equipment manufacturer.
- 6.2.12 The same training will be provided to senior management enabling a dual-level maintenance programme.

Incident response

- 6.2.13 All employees are required to be familiar with the Environmental Controls and Emergency Procedures detailed within the EMS.
- 6.2.14 In addition to normal operating conditions, employees must also be trained in dealing with eventualities and incidents which may occur outside the scope of normal operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.
- 6.2.15 In the event that there is an incident or breach in relation to any of the above scenarios, refresher training will be initiated sooner. If any new issues relating to the operation occur, the training will be reviewed, and new procedures will be implemented.

6.3 Toolbox talks

- 6.3.1 All operational staff will receive fire awareness training / toolbox talks by trained site management to detect early signs of fire and to minimise the chance of a fire breaking.

7 Quarantine Area

7.1 General

- 7.1.1 In accordance with Section 12 of the FPP guidance a designated quarantine area has been provided as shown on the Permit Layout Plan. The quarantine area will be kept clear at all times.
- 7.1.2 The largest area storing waste would be the Storage of hazardous liquids in containers and if full would equate to approximately 10m³. The dedicated quarantine bay has a total volume of 10m³ which is more than 50% of the largest waste storage area.
- 7.1.3 Wastes will only be moved to the quarantine area if safe to do so following recommendation of the FRS.

7.2 Use of quarantine area

- 7.2.1 **IMPORTANT** - In the event of a fire, the quarantine area will only be used to remove any wastes stored near any material which is smouldering or on fire (but not itself directly affected by the fire) to prevent the fire spreading. No burning waste will therefore be moved to the quarantine area to ensure all firefighting waters will be contained within the site's sealed drainage area (i.e. the concreted areas).
- 7.2.2 Surrounding wastes would be moved using the onsite plant and will only be moved to the quarantine area if safe to do so.

8 Fire detection procedure

8.1 Fire detection

8.1.1 There are no proposals to install an automated detection system on site as it is considered visual monitoring by site operatives throughout the operational day along with 24/7 CCTV is ample given the types of waste stored, the small quantities of waste stored and duration for which it is stored. Alternative measures have been discussed in Section 8.3

8.1.2 In the event of a fire or signs of fire from the site, the site manager or TCM can call other staff and be at the site within 10 minutes to commence fire-fighting procedures.

8.1.3 Given the nearest fire station is located approximately 3.0 miles from the site, it is considered the FRS would be available to attend an emergency call within 10 minutes to assist the emergency contact in suppressing and controlling the fire using their expertise and appliances.

8.2 Manual detection/on site detection

8.2.1 If a fire is detected or suspected by a member of staff, it must be immediately reported to the site manager or TCM. The site manager will then conduct the following procedure:

- a) Raise the fire alarm (if not already done by another staff member).
- b) Initiate evacuation of staff and visitors on site to the meeting point and instruct delegated person(s) to conduct a roll-call to ensure all site users are accounted for.
- c) Assess the intensity and scale of the fire and make a judgment as to whether the fire can be managed without the requirement for assistance from the emergency services i.e. using the hose or fire extinguishers.
- d) If viable and safe, instruct necessary site staff to commence extinguishment.

8.3 Alternative measures – Fire detection

8.3.1 The site will store small amounts of waste inside building 3 and has the following measures in place which negate the requirement for a detection system:

- a) The site is operational 24 hours, 6 days a week, therefore, the waste will be constantly monitored throughout the working day by staff trained to identify the risks of fire and raise any issues at an early stage.
- b) Outside of these operational hours, CCTV is utilised at the site to monitor all storage and treatment areas; site management can view the CCTV remotely at any time to monitor the site. The CCTV is monitored outside of operational hours by an external monitoring company who will quickly detect any fires and alert the operator and FRS of any incidents. The operator will be able to respond to any incidents and attend the facility within 15 minutes to assist the FRS in firefighting. Key staff will also be on call to respond to any emergency via an on-call rota.
- c) The site will only be storing small amounts of combustible waste within the building i.e. maximum of 10 tonnes in total at any one time. Signs will be installed at the site detailing the maximum storage volumes and residence times of each storage area.
- d) The wastes stored will have already been subject to pre-acceptance and waste acceptance checks and are therefore unlikely to contain any hot loads or incompatible waste which could lead to a spark or overheating causing a fire.
- e) Waste will be stored within adequate containers, IBCs, bins and drums to contain waste and prevent the mixing and cross-contamination of loads. There is strictly no mixing or decanting of wastes in this area. The storage methods will also enable quick detection and movement of waste around the site during a fire event to reduce the spread of a fire. Non-hazardous and hazardous waste storage areas are separated by a firewall.
- f) A fire-watch will be implemented prior to cessation of works to ensure that there is no potential risk of ignition outside of operations hours.
- g) The combustible waste is not stored for longer than <7 days which is significantly less than the guidance permits.
- h) The operator intends to keep stored wastes to an absolute minimum at all times.
- i) The building has direct access to allow for the quick removal of material in a fire event.

9 Fire response procedures

9.1 Response procedure

9.1.1 Further to the detection measures in Section 8, the following procedures would apply in the event of a fire at the site:

- a) Call the Fire Response Service (FRS) immediately using 999.
- b) Call the EA's Emergency Contact Number.
- c) A suitably trained employee will initiate fire water containment measures to close the site's surface water drainage system (see Section 11).
- d) Prior to the FRS arriving, inform all neighbouring premises likely to be affected.
- e) If not previously informed, senior management of the company will be informed at this point of the details, nature and extent of the fire and whether assistance from staff from other depots is required.
- f) Ensure access routes are clear.
- g) If safe to do so, site management will inspect the location of the fire, to identify immediate risks to surrounding premises and the FRS.
- h) Ensure operators of appropriate machinery are standing by in a safe location to help create fire breaks, under the direction of the FRS when they arrive.
- i) Site management will identify themselves to the FRS as soon as they arrive on site and will provide them with a copy of this document and update them with relevant information that will assist them in dealing with a fire more effectively.
- j) Implement pollution control measures if safe to do so (see Section 11).

9.1.2 In the event of site management being absent from site, the operator will ensure the TCM, or a suitably competent deputy is available during operating hours to take command of an incident should one occur.

9.2 Staff/Visitor Response Procedure

9.2.1 The following quick actions will be undertaken by site operatives where a fire is detected or suspected on site:

- a) Don't panic
- b) Inform the site manager or technically competent manager immediately
- c) Raise the alarm (if not done so already)
- d) Do not try to tackle the fire yourself unless you are trained in doing so and you are sure of the nature of the fire
- e) Leave the site using the nearest exit as quickly and as orderly as possible
- f) Assemble at the specified fire assembly point
- g) The site manager or delegated operative will be in charge of calling the emergency services on "999" and ensuring that all persons who were working in the building are assembled safely
- h) Do not return to the site until you have been given the 'all clear' by the emergency services and/or site management / responsible person.

9.3 **Evacuation of Staff (and Drill Procedure)**

- 9.3.1 An evacuation plan has been formulated for the site, and all operational staff will be made aware of the actions through site inductions, refresher training, toolbox talks etc.). The fast and effective evacuation of staff to the fire assembly point will increase safety on site and limit the impact of a fire on any persons on site.
- 9.3.2 Fire drills will take place every 12 months and 1 month after site operations commence to ensure evacuation times are acceptable and that site staff remain informed of evacuation procedures.
- 9.3.3 The drill will be a simulation of an emergency with the location of a mock fire notified to staff in order to test the response speed in deploying pollution control equipment i.e. including the penstock / shut-off-valve and ensure all firefighting equipment is sound. The fire check form may also be completed and a detailed report of the outcome of the exercise will be prepared to assist with staff training.

9.4 **Access for emergency services**

- 9.4.1 The site is located off St Michaels Close, and the access road provides direct access to the site for the emergency services with the nearest Fire Station (Larkfield Fire Station) situated approximately 3.0 miles away from the site. The response time is expected to be within 10 minutes.
- 9.4.2 The width of the surrounding roads and gateway exceeds the minimum required by the FRS which is 3.7m. Site management will also ensure the 3.7m access routes are maintained throughout the working day and before cessation of works during site inspections.
- 9.4.3 Access routes for emergency services around the site are clearly shown on the Layout Plan.

9.5 **Notifying nearby properties**

- 9.5.1 As it isn't feasible for a contact number to be provided for every individual residential business/commercial receptors within 1km, the site would contact the LA, the Environment Agency, Police and the Fire & Rescue Service who would co-ordinate an approach once staff from Elliot Environmental Drainage Limited have contacted them by phone and/or email. It is considered human receptors within 200m will hear alarms from site and be able to see signs of smoke so they can take appropriate actions as they see necessary.
- 9.5.2 The most sensitive receptors (i.e. the closest business receptors to site) have been included within the table and will be contacted by staff from Elliot Environmental Drainage Limited in the first stages of a co-ordinated approach.

Table 9.1 - Receptor Contact Information

Contact	Description	Contact number
1 st Choice Concrete Maidstone	Adjacent business receptor	01622 793841
DS Commercials	Adjacent business receptor	01622 715834
Encon Insulation	Adjacent business receptor	01622 713400
Cobtree Manor Park Golf Course	Nearby Business/Leisure receptor	01622 753276
Cobtree Manor Park	Nearby Leisure receptor	01622 715702

9.5.3 Once Emergency Services arrive on site i.e. FRS, Police, the lead authority (usually the Police) will co-ordinate a systematic approach to ensure all the relevant sensitive receptors within 1,000m are notified. In addition to this, the Emergency Services would also publicise the fire on their Social Media outlets and contact local news websites and radio broadcasters who can also provide updates on the incident.

9.5.4 The police with the assistance of ECSS and any other attending authority will ensure all relevant properties are informed of the fire event and given clear instructions of the actions they need to take.

10 Suppressing fires & water supply

10.1 General

10.1.1 Section 16 of the EA's FPP mentions the site should have enough water available for firefighting to take place and to manage a worst-case scenario. A worst-case scenario would be the largest waste pile catching fire.

10.1.2 The largest stockpile stored on site equates to approximately 10m³ and to extinguish within 3 hours it would require approximately 12,000 (12m³) of water requiring a flow of approximately 66.7 litres per minute based on the calculation provided in the table below.

Table 10.1 - Water supply calculations

Maximum pile volume in m ³	Water supply needed in litres per minute	Overall water supply needed over 3 hours in litres	Total water required to extinguish fire
10	10 x 6.67 = 66.7	66.7 x 180	12,000 (12m ³)

10.2 External suppression - fire hydrants

10.2.1 Due to the location of the site within an industrial area, there will be several hydrants in proximity to the site, and these may be used as the main form of suppression. The site also benefits from an onsite hydrant as detailed on the Permit Layout Plan.

10.3 On-site suppression measures

10.3.1 There are fire extinguishers located on the site which can be deployed in the event of an incident to tackle the fire or for fire suppression in the intervening time between discovery of the fire and the arrival of the FRS.

10.3.2 Mobile plant listed i.e. excavators, loading shovels will be used to move containers to the quarantine area and away from waste that is on fire to prevent it from spreading. The waste will be kept here until the fire has been extinguished. The site may also fill a sealed skip with water and load burning waste into it.

10.3.3 The site is able to bring/hire in additional plant, tankers and bowsers to help move waste, remove fire water and aid in fighting fires.

10.4 **Alternative measures - Suppression**

10.4.1 The site will store small amounts of waste inside the building and has the following measures in place which negate the requirement for a suppression system:

- a) The site is operational 24 hours, 6 days a week, therefore, the waste will be constantly monitored throughout the working day by staff trained to identify the risks of fire and raise any issues at an early stage. Outside of these hours, CCTV is utilised as detailed in 10.4.1 (f). The operator will be able to respond to any incidents and attend the facility within 15 minutes to assist the FRS in firefighting. Key staff will also be on call to respond to any emergency via an on-call rota.
- b) The site will only be storing small amounts of combustible waste within the building which are easily transported around the site due to the methodology of storage.
- c) The wastes stored will have already been subject to pre-acceptance and waste acceptance checks and are therefore unlikely to contain any hot loads or incompatible waste which could lead to a spark or overheating causing a fire.
- d) Waste will be stored within adequate containers, IBCs, bins and drums to prevent mixing of loads. The storage methods will also enable quick movement of waste around the site during a fire event to reduce the spread of a fire.
- e) A fire-watch will be implemented prior to cessation of works to ensure that there is no potential risk of ignition outside of operations hours.
- f) The CCTV is utilised at the site; site management can view the CCTV remotely at any time to monitor the site. The CCTV is monitored outside of operational hours by an external company as detailed in Section 2.7 and 8.3.
- g) The combustible waste is not stored for longer than <7 days which is significantly less than the guidance permits.
- h) The operator intends to keep stored wastes to an absolute minimum at all times.
- i) The building has direct access to allow for the quick removal of material in a fire event.
- j) The site benefits from an onsite hydrant which can be used instantly during a fire event to extinguish a fire.

- k) The operator will utilise a combination of foam, dry powder and Carbon Dioxide extinguishers to tackle a fire at the site. Fire blankets will also be readily available which can be placed over skips to smother oxygen levels and extinguish the fire. These are located within building 3 as illustrated on the Permit Layout Plan.

11 Managing fire water

11.1 Drainage

11.1.1 All combustible wastes will be stored on a concrete pad and within a building, the entire site benefits from a sealed drainage system with an interceptor that has a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed.

11.1.2 If there is any deviation from the current drainage arrangement, an amended FPP will be submitted for approval by the EA and FRS.

11.2 Containment of fire water

11.2.1 As detailed in Section 10.1.2, the largest internal pile would require containment for 12m³ of water in accordance with the FPP guidance.

Table 11.1- Firewater Containment Calculation

Volume of Water (m ³)	Containment Area of external yard and building 3 (m ²) (approx)	Containment Required	Total Containment
12	1,513	12m ³ / 1,513 = 0.01	See Section 11.2.2 below

11.2.2 The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Permit Layout Plan. As stated in Section 11.1, the drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event.

11.2.3 It is clear from the above, the total containment volume available meets the requirement of the amount of fire water likely to be generated during a worst-case scenario fire; therefore, it is considered that this requirement of the FPP guidance has been met.

11.3 **Removal of fire water**

11.3.1 Upon successfully extinguishing a fire all standing fire water would be pumped using a hired-in vacuum tanker and deposited to a suitably permitted site for treatment.

12 After an incident

12.1 Contingency Planning

12.1.1 The operator services a large number of regular waste collection contracts (i.e. trade waste collection rounds).

12.1.2 In the event of a fire the site will cease accepting waste. All drivers who are waiting to deliver wastes to the site or are on approach to the site during a fire will be notified by site admin staff and any who arrive without prior notification will be turned away. During any periods of site shutdown due to a fire incident, all waste deliveries will be delivered directly to alternative waste facilities in the borough. This would essentially be reverting to the pre-existing situation (prior to the issue of the permit) where all waste collection vehicles which operate from the site deliver waste directly to the onward waste recycling/processing facilities. Details of the alternative facilities can be provided to the EA upon written request.

12.1.3 The site will not be reopened for the acceptance and bulking/treatment of waste until the post-fire site recovery procedures outlined in the section below have been fully implemented.

12.2 Site decontamination

12.2.1 Surface water on site will be cleared using the following method:

- a) Using a bowser, all standing fire water should be sucked up and taken off site or stored in a tank/bowser prior to removal off site.
- b) Using all available resources, manually clean out surface water gullies removing the debris to the pile of fire damaged waste for removal to landfill or permitted site.
- c) Using a road sweeper, sweep the yard (damp as required using the bowser) until all ash and clinker has been removed.
- d) All debris has now been isolated and all contaminated water holding areas have been cleaned and emptied.

- e) Wash the yard down in its entirety using clean water or allow a reasonably heavy rain shower to wash the yard down.
- f) It is at this stage that site management should decide whether it is appropriate to remove the surface water protection measures or repeat areas of the clean-up.

12.2.2 If the clean-up operation has been deemed complete, the surface water protection measures can now be removed. This will be achieved using the following methods:

- a) Remove any temporary bungs and re-open the shut-off valve.
- b) Surface water discharge from the site is now possible the next time it rains to discharge to the sewer. Ensure that surface water checks are made during the next rainfall event to validate that clean-up has been undertaken satisfactorily. Record all findings and actions in the site diary.
- c) Account for all consumables that have been used in the fire and re-order / replace immediately.
- d) Restack, and re-locate all items used for the surface water protection during the fire to their storage locations ready for future deployment.
- e) Check monthly that items are still present and correct and still serviceable for use in an emergency.

12.2.3 The operator will liaise with the EA throughout the event ensuring they are satisfied with the clean-up programme and the operator will gain agreement on when the site can begin accepting waste again.

12.3 **Post fire site recovery**

12.3.1 If a recovery procedure is required, the operator would instigate the following;

- a) Remove damaged material to a permitted facility that is able to deal with it legally.
- b) Ask engineers to carry out repairs on any plant, vehicles and/or infrastructure.
- c) Assist the FRS with the fire investigation and where necessary engage the advice from a professional fire consultant.
- d) Review the FPP and EMS procedures and improve upon where found deficient.

- e) Review training requirements for staff.
- f) Assess whether further preventative measure could be implemented.
- g) Ensure all fire equipment, where used, is replenished.
- h) Remove fire water to a permitted facility for disposal.

Appendix I

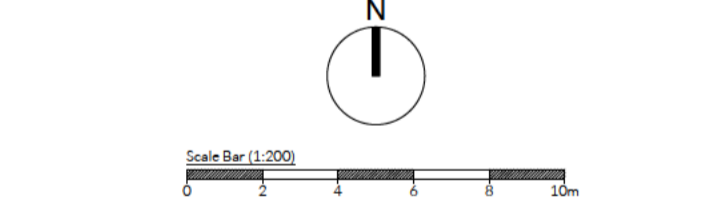
Drawings

NOTES
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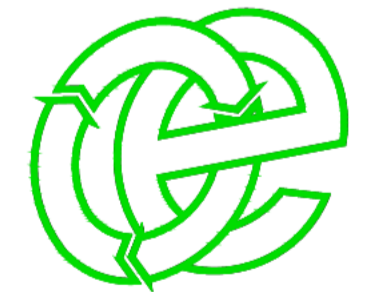
Rev:	Date:	Init:	Description:
-	08.11.23	RS/IA	Initial drawing
A	07.03.24	JH	Amendment
B	08.03.24	JH	Parking added
C	11.06.24	JH	Working amendment
D	19.06.24	RS	Application submission
E	26.06.24	RS	Quarantine area added
F	01.10.24	IA	Emission point added
G	24.10.25	RS	Schedule 5 response update
H	05.11.25	RS	Crash barriers added
J	06.11.25	RS	Minor amendment
K	10.03.26	JH	Amendment
L	10.03.26	JH	Amendment
M	12.03.26	JH	Amendment

- KEY:**
- Permit boundary
 - Chemicals and raw materials storage area
 - Out-of-hours plant storage area
 - Extent of concrete surfacing within the permit boundary
 - Unsurfaced areas (freely-draining to ground)
 - Bund wall around external containment area
 - Perimeter bunding around main facility (including access ramp)
 - Fire wall
 - Bunding around the thresholds of Building 1
 - Vehicle crash barrier (Armco, or similar)
 - INT Full retention oil interceptor (fitted with penstock valve)
 - Piped surface drainage (surface, foul, building)
 - Linear slot drains (aco or similar) - (surface, building)
 - MH Manhole (foul, surface, building)
 - ic Inspection cover (other services)
 - Gully
 - Quarantine area (only used in the event of a fire and kept clear at all other times)
 - 6 metre separation distance around the quarantine area where no other combustible wastes will be stored
 - Penstock valve remotely deployable in the event of an emergency or spill to shut-off yard drainage preventing site discharge to surface water system
 - Bunded fuel tank (1,340 litre or similar)
 - On-site fire hydrant
 - Numbered boundary odour monitoring points (indicative)
 - Dosing points
 - Venting points
 - Odour control lines
 - Firefighting equipment/extinguishers (indicative locations)
 - Spill kits (indicative locations)

Additional point references	
Item	Description
1	Polymer make-up system
2	Solid sludge hopper
3	Waste oils/grease (IBCs)
4	5-way manifold
5	Flush point



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
PERMIT LAYOUT PLAN

CLIENT
Elliott Environmental Drainage Ltd

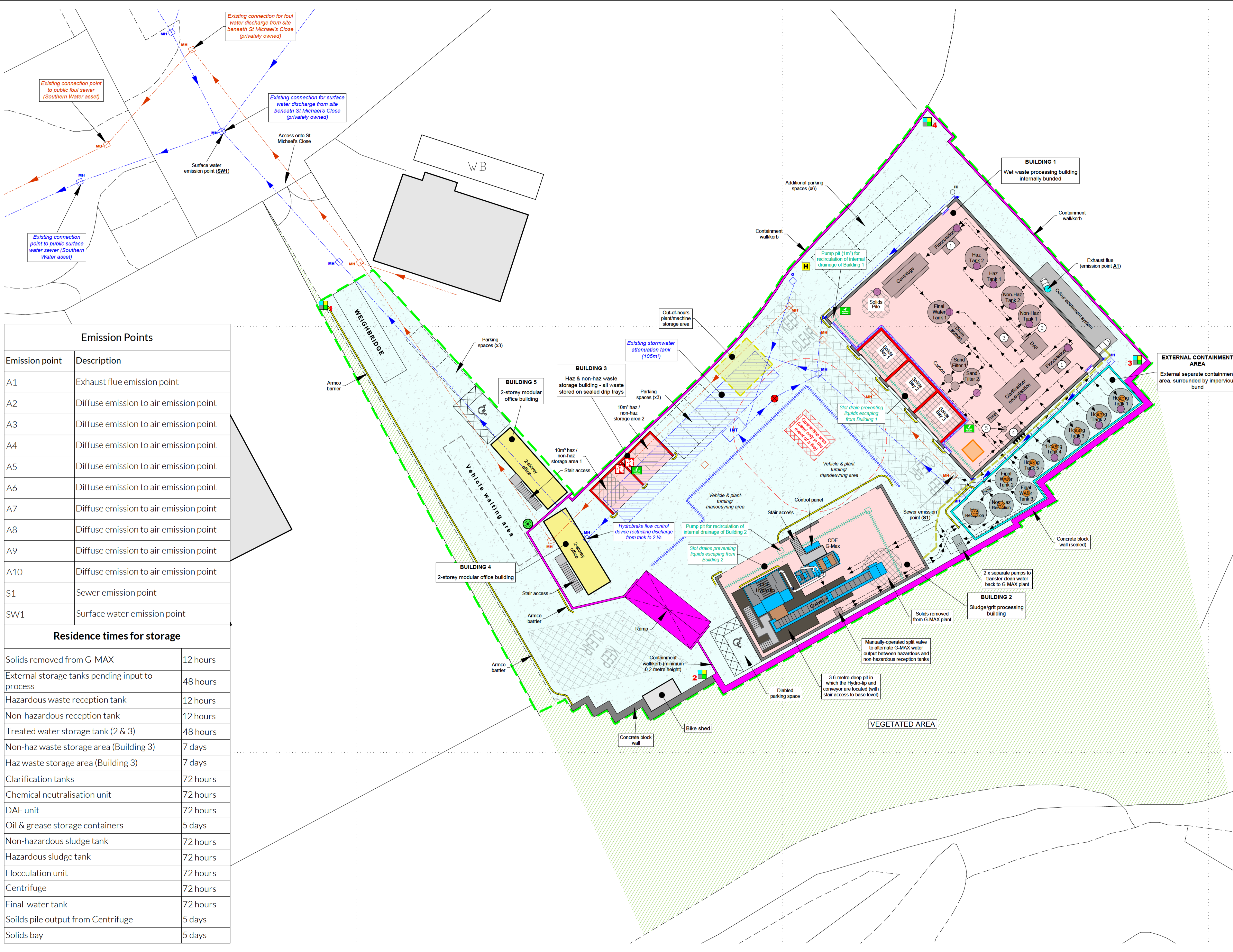
PROJECT/SITE
St Michael's Close, Aylesford, Kent

SCALE @ A1 1:200	CLIENT NO 2499	JOB NO 002
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DRAWING NUMBER 2499-002-03	REV M	STATUS Issued
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DRAWN BY RS/JH	CHECKED RS	DATE 12.03.26
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Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

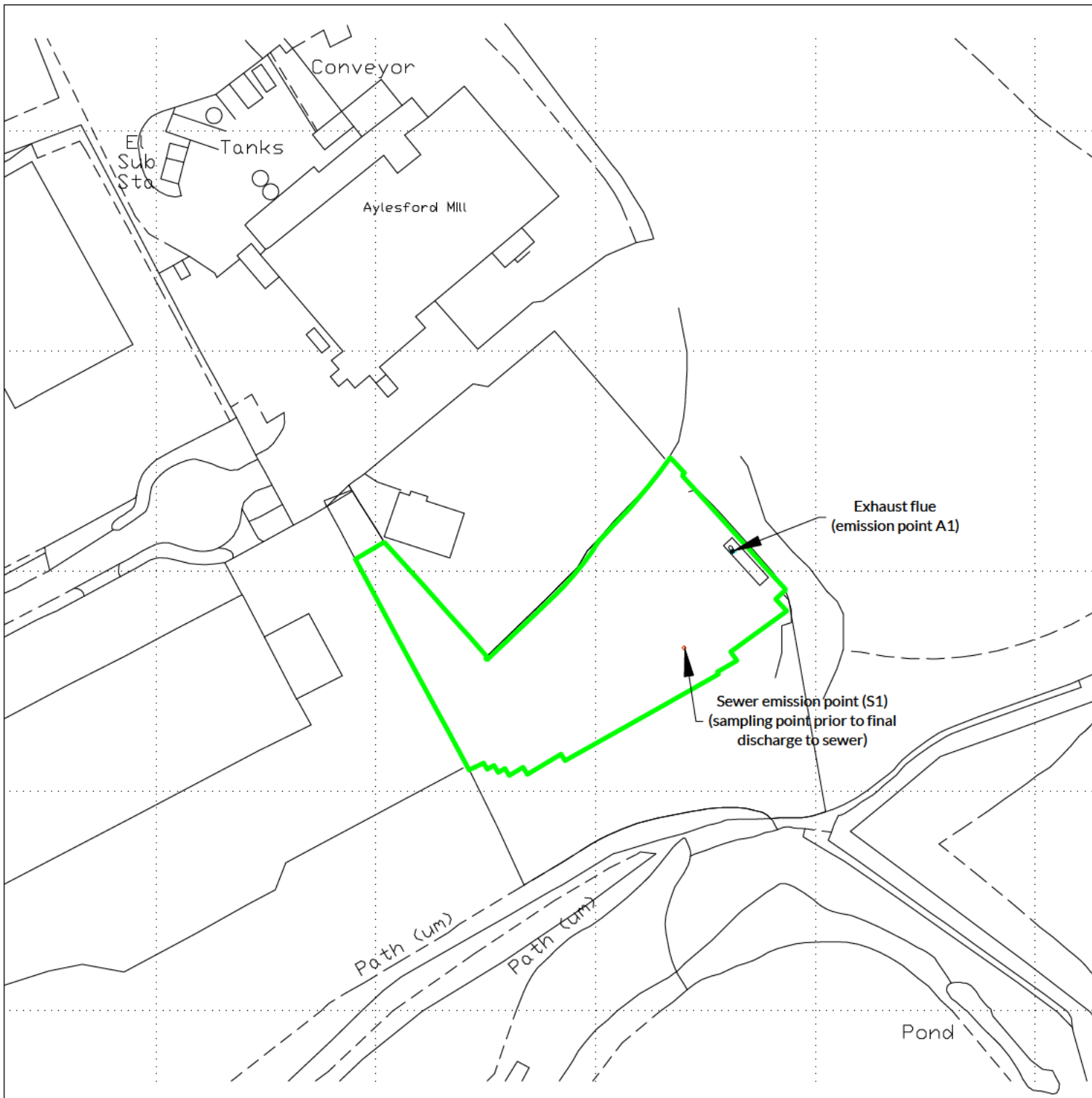


Emission Points

Emission point	Description
A1	Exhaust flue emission point
A2	Diffuse emission to air emission point
A3	Diffuse emission to air emission point
A4	Diffuse emission to air emission point
A5	Diffuse emission to air emission point
A6	Diffuse emission to air emission point
A7	Diffuse emission to air emission point
A8	Diffuse emission to air emission point
A9	Diffuse emission to air emission point
A10	Diffuse emission to air emission point
S1	Sewer emission point
SW1	Surface water emission point

Residence times for storage

Solids removed from G-MAX	12 hours
External storage tanks pending input to process	48 hours
Hazardous waste reception tank	12 hours
Non-hazardous reception tank	12 hours
Treated water storage tank (2 & 3)	48 hours
Non-haz waste storage area (Building 3)	7 days
Haz waste storage area (Building 3)	7 days
Clarification tanks	72 hours
Chemical neutralisation unit	72 hours
DAF unit	72 hours
Oil & grease storage containers	5 days
Non-hazardous sludge tank	72 hours
Hazardous sludge tank	72 hours
Flocculation unit	72 hours
Centrifuge	72 hours
Final water tank	72 hours
Solids pile output from Centrifuge	5 days
Solids bay	5 days



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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	19.06.24	RS	Initial drawing
A	24.10.25	JH	Emission points added

N

Scale Bar (1:1,250)

TITLE:
PERMIT BOUNDARY PLAN

CLIENT:
 Elliott Environmental Drainage Ltd

PROJECT/SITE:
 St Michael's Close, Aylesford, Kent

SCALE @ A4: 1:1,250	CLIENT NO: 2499	JOB NO: 002
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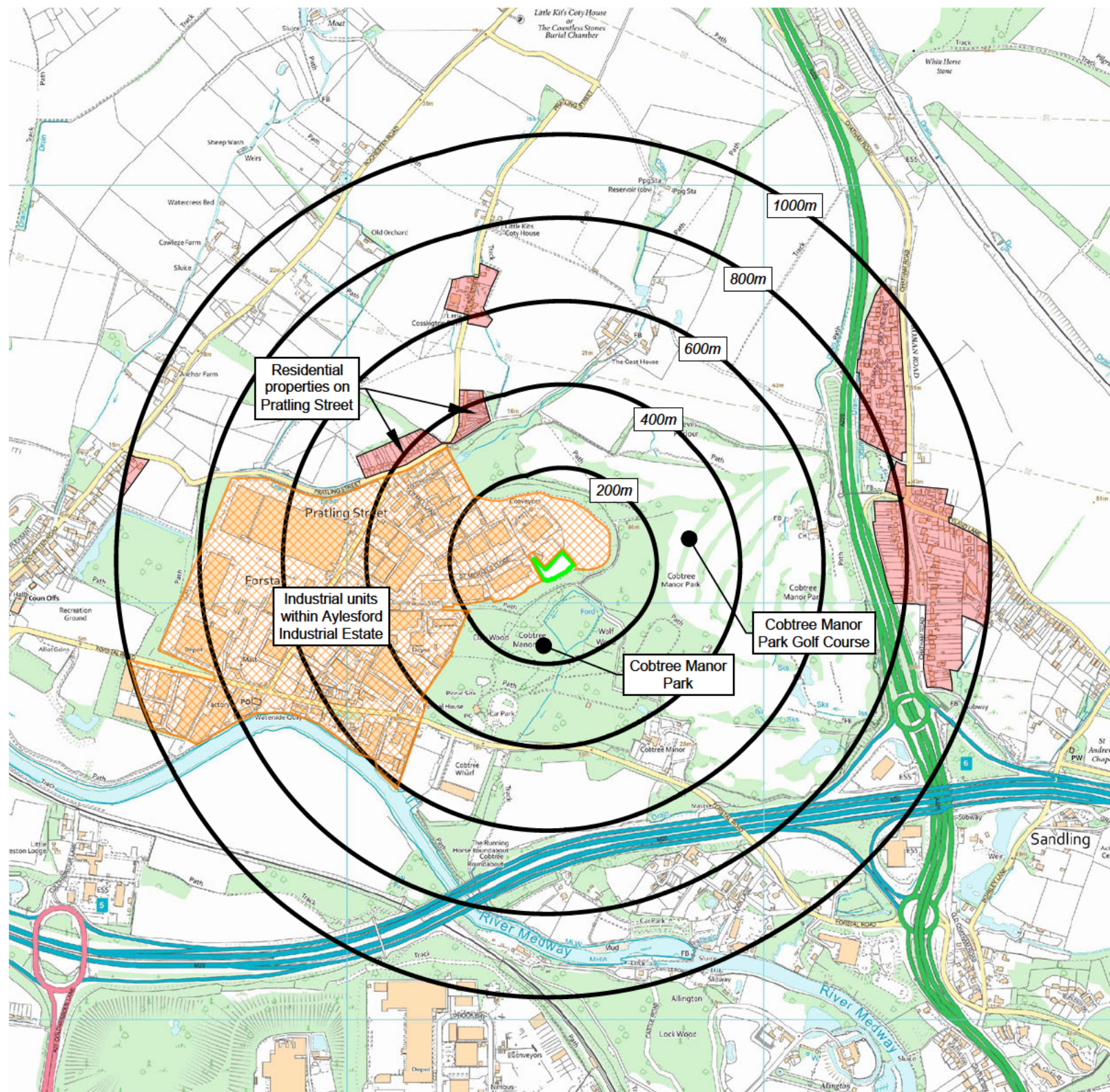
DRAWING NO: 2499-002-02	REV: A	STATUS: Issued
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DATE: 24.10.25	DRAWN: JH/RS	CHECKED: RS
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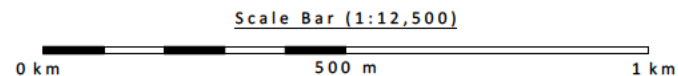
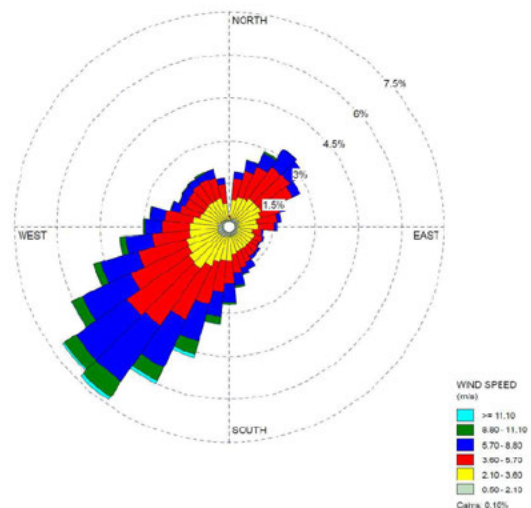


KEY:

- Permit boundary
- Plymyard Dale (Main River)
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- H Nearest fire hydrant
- Railway line
- SCH School
- Woodland areas
- Protected sites (Ramsar, SSSI, SPA, SAC)
- Nature reserves



Compass Wind Rose for grid squares pertaining to the site (period 2019 - 2023)



NOTES

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

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REVISION HISTORY

Rev	Date	Init:	Description:
-	09.06.23	RS/IA	Initial Drawing
A	08.11.23	RS/IA	Boundary amendment
B	06.08.24	IA	Boundary amendment

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT
Elliot Environmental Drainage Limited

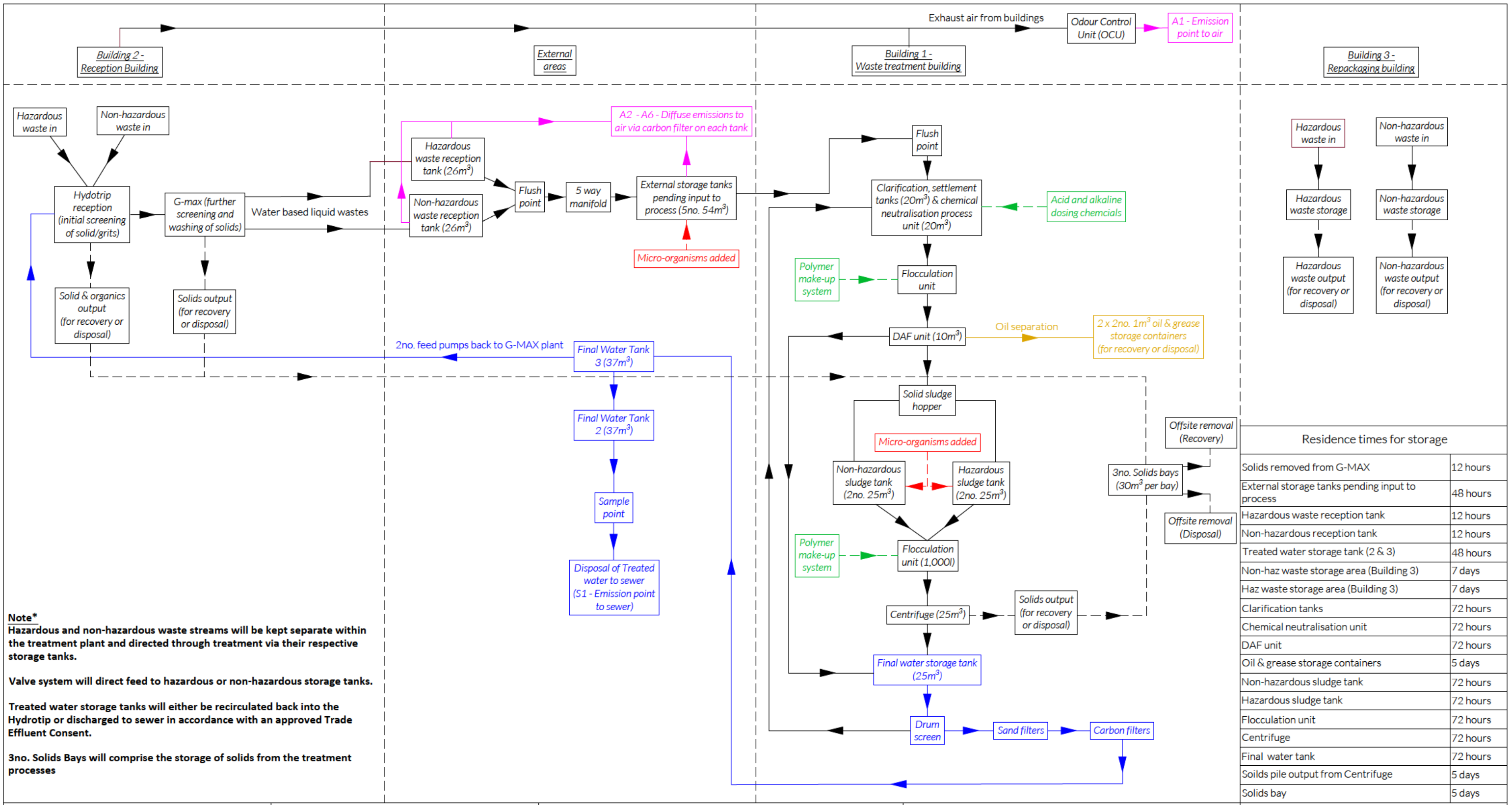
PROJECT/SITE
St Michael's Close, Aylesford, Kent, ME20 7XE

SCALE @ A3 1:12,500 **JOB NO** 002 **CLIENT NO** 2499

DRAWING NUMBER 2499-002-04 **REV** B **STATUS** Issued

DRAWN RS/IA **CHECKED** RS **DATE** 06.08.24

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk



Note*
 Hazardous and non-hazardous waste streams will be kept separate within the treatment plant and directed through treatment via their respective storage tanks.

Valve system will direct feed to hazardous or non-hazardous storage tanks.

Treated water storage tanks will either be recirculated back into the Hydrotip or discharged to sewer in accordance with an approved Trade Effluent Consent.

3no. Solids Bays will comprise the storage of solids from the treatment processes

Residence times for storage	
Solids removed from G-MAX	12 hours
External storage tanks pending input to process	48 hours
Hazardous waste reception tank	12 hours
Non-hazardous reception tank	12 hours
Treated water storage tank (2 & 3)	48 hours
Non-haz waste storage area (Building 3)	7 days
Haz waste storage area (Building 3)	7 days
Clarification tanks	72 hours
Chemical neutralisation unit	72 hours
DAF unit	72 hours
Oil & grease storage containers	5 days
Non-hazardous sludge tank	72 hours
Hazardous sludge tank	72 hours
Flocculation unit	72 hours
Centrifuge	72 hours
Final water tank	72 hours
Solids pile output from Centrifuge	5 days
Solids bay	5 days

TITLE: PROCESS FLOW

CLIENT: Elliot Environmental Drainage Ltd

Waste, Planning & Environmental Consultants

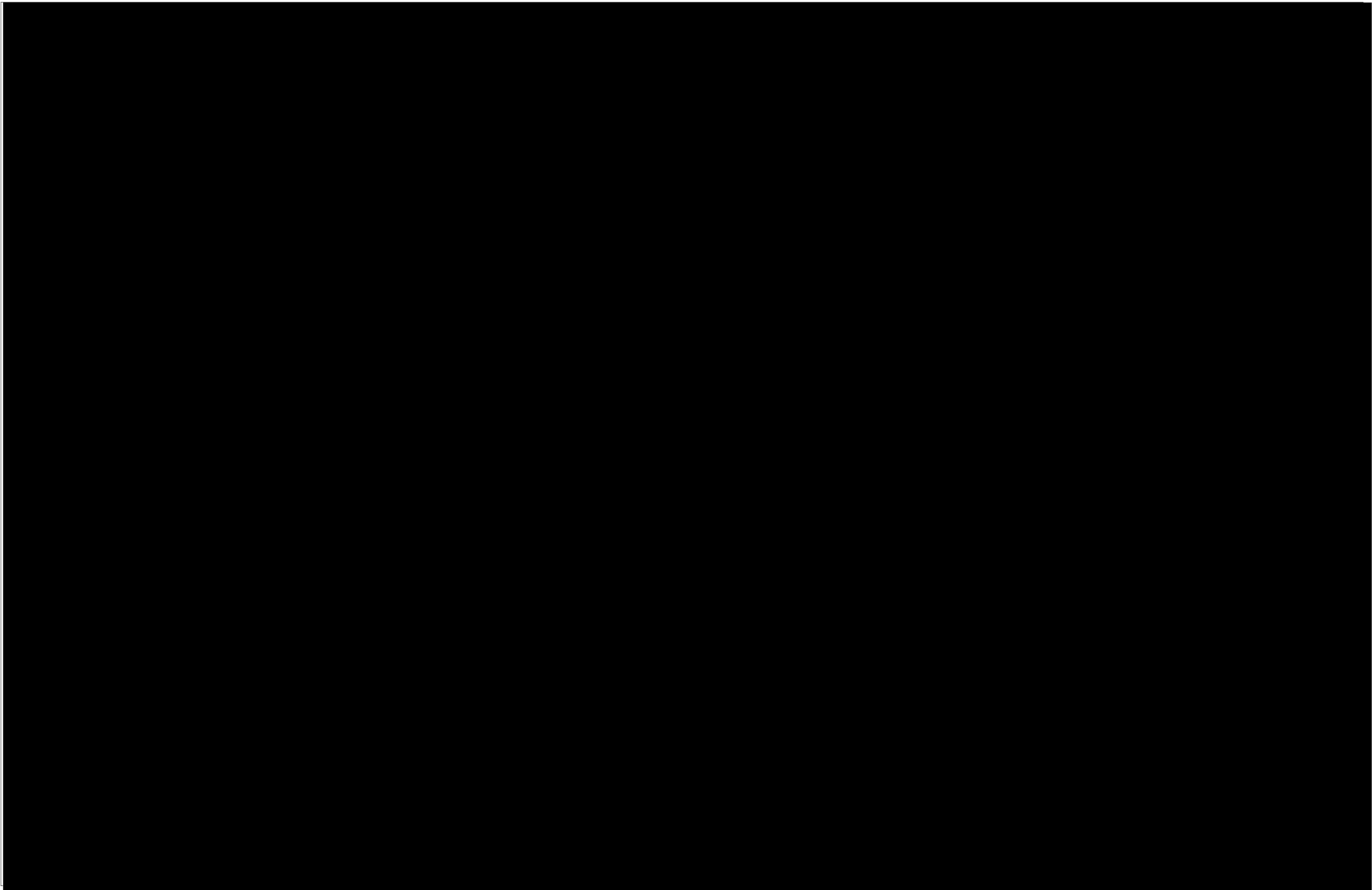
PROJECT/SITE: St Michael's Close, Aylesford, Kent			
SCALE @ A3: Not to scale	CLIENT NO: 2499	JOB NO: 002	
DRAWING NO: 2499-002-06	REV: D	STATUS: Issued	
DATE: 24.02.2026	DRAWN: IA	CHECKED: DY	
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KEY:

- Process line
- Water treatment flow & emission point to sewer
- Air emission points
- Oil separation treatment flow
- Raw material input
- Biological process

REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	29.08.25	IA	Initial drawing
A	23.10.25	IA	Treatment process amendments
B	23.10.25	IA	Process flow amendments
C	24.10.25	IA	Client comments
D	24.02.26	IA	Process flow amendments



Appendix II

Record Keeping Forms

ELLIOT ENVIRONMENTAL DRAINAGE LIMITED SITE INSPECTION FORM (MINIMUM TWICE DAILY)								
		DAY →						
TYPE OF INSPECTION ↓	TIME OF INSPECTION (START)							
	TIME OF INSPECTION (FINISH)							
EMERGENCY ACCESS								
SECURITY - GATES								
SECURITY - FENCING								
SITE ROADS / SURFACES (CLEAR FROM HAZARDS)								
WASTE CONTAINERS								
WASTE TYPES - COMPATIBILITY								
COMBUSTIBLE WASTE STORAGE (WITHIN PROPOSED LIMIT)								
COMBUSTIBLE WASTE STORAGE (AWAY FROM POTENTIAL IGNITION SOURCES)								
FIRE FIGHTING EQUIPMENT EG FIRE EXTINGUISHERS, HOSE REEL								
STAFF ON SITE HAVE RECEIVED FIRE SAFETY TRAINING								
CONCRETED AREA AND SEALED DRAINAGE (INTEGRITY)								
DRAINAGE / GULLIES FUNCTIONING								
HOT EXHAUSTS FIRE WATCH								
NO SMOKING SIGNS IN PLACE								
QUARANTINE AREA CLEAR								
WELFARE / OFFICE FACILITIES								
ELECTRICAL APPLIANCES AND CABLING CHECK								
HOT EXHAUSTS FIRE WATCH (DUST/FLUFF CLEANED REMOVED)								
LITTER (I.E. LOOSE COMBUSTIBLE WASTE MATERIALS)								
REJECTED WASTE TYPES / STORAGE								
FIRES (ANY INCIDENTS REPORTED)								
PLANT/EQUIPMENT MAINTENANCE CHECKS								
TRAINING RECORDS								
OTHER (SEE NOTES BELOW)								
INSPECTION CARRIED OUT BY								
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):								
CHECKED BY				SIGNATURE				
POSITION				DATE				
<i>Sheet</i>				<i>of</i>				

**ELLIOT ENVIRONMENTAL DRAINAGE LIMITED
 PREVENTATIVE MAINTENANCE CHECKLIST**

CHECKED BY	POSITION
DATE	DATE OF LAST CHECKLIST

	EQUIPMENT ITEM					
OFFICIAL MAINTENANCE CHECK REQUIRED (Y/N)						
IF NO, DATE OF LAST CHECK						
IF YES, DATE OF NEXT CHECK						
IS ITEM IN CORRECT WORKING ORDER						
LEAKAGES OF OIL/DIESEL ON MOBILE PLANT / VEHICLES						
IF NO, WHAT REPAIRS ARE REQUIRED (USE SEPARATE SHEET IF REQUIRED)						
WERE REPAIRS DETAILED ON THE LAST CHECKLIST						
IF YES, HAVE THEY BEEN CARRIED OUT						
ADDITIONAL REPAIRS OR ACTIONS REQUIRED						

ELLIOT ENVIRONMENTAL DRAINAGE LIMITED - EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW

EMPLOYEE NAME			DATE							
POSITION			REVIEW DUE							
TRAINING CARRIED OUT BY										
POSITION										
TRAINING REQUIRED	GENERAL OPERATIVES		DRIVER		PLANT OPERATOR		YARD MANAGER		TECHNICALLY COMPETENT MANAGER	
CARRIED OUT?	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE	Y/N	SIGNED BY EMPLOYEE
SITE RULES AND INFRASTRUCTURE										
EMERGENCY PROCEDURES										
FIRE SAFETY/ FIRE FIGHTING										
RECOGNITION OF WASTE TYPES										
RECOGNITION OF MAXIMUM PILE SIZE										
RECOGNITION OF MAXIMUM STORAGE DURATION										
FIRE DETECTION - EARLY SIGNS I.E. VISUAL										
STORAGE AREAS/LIMITS										
FIRE FIGHTING EQUIPMENT & ALARMS										
FIRE WATER CONTAINMENT MEASURES										
PLANT / VEHICLE CHECKS (Preventative Maintenance)										
PLANT OPERATION - LOADING PLANT										
FIRE PREVENTION PLAN, MANAGEMENT SYSTEM & PERMIT										
SPILLAGE/CLEARANCE MEASURES										
OTHER 1 (PLEASE SPECIFY)										