

ENTYRE GROUP LIMITED

Fire Prevention Plan

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1 - BUSINESS ACTIVITY

Primary Activity: The purchase of 'End of Life' truck tyres (casings) for grading/sorting for further use as source material for the manufacturer of re-tread truck tyres. Re-tread truck tyres consume approximately 1 million casings per annum.

Principle trading partners:

Michelin Tyre Plc, Continental Tyre Ltd (Bandvulc), Vaculug Traction Tyres Ltd. There has been commercial arrangements with these key UK re-tread manufacturers in excess of 20 years.

Truck casings are purchased to order based on a specified requirement (manufacturer requirement), stockholding is to alleviate the need for the manufacturer to hold excessive stock, and to facilitate a 'just in time' casing supply chain.

In the event of a major incident on the ENTYRE GROUP LIMITED site, the purchase activity would cease thus ending the supply of truck casings onto the site.

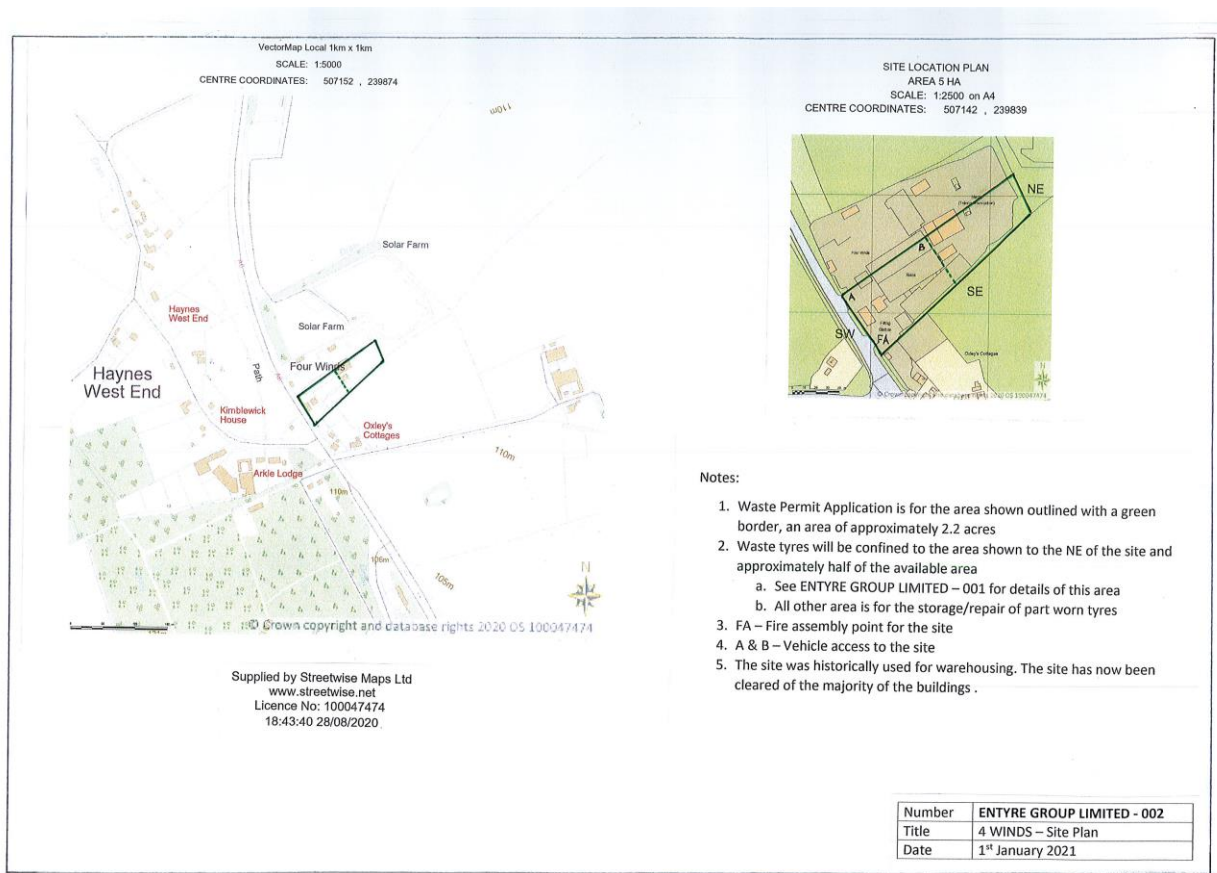
There is no manufacturing activity on the site. Activities are tactile grading, sorting and outside storage.

1a – KEY PERSONNEL

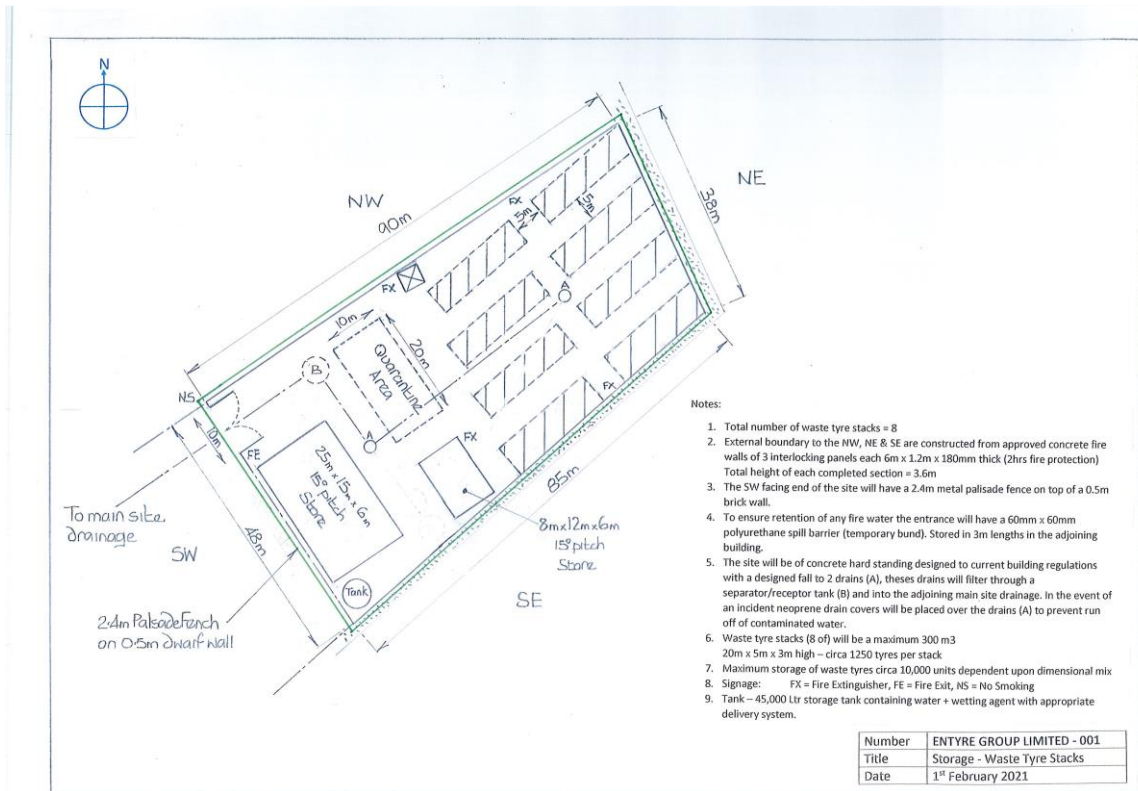
KEY PERSONNEL
Paul Bruce - Director Nicola Doyle – Office Manager/WAMITAB Site Operations Manager - TBC

Appendix 1

Site Location - 4 WINDS Site Plan – ENTYRE GROUP LIMITED 002



Appendix 2 Storage – Waste Tyre Stacks – ENTYRE GROUP LIMITED 001



Appendix 2a

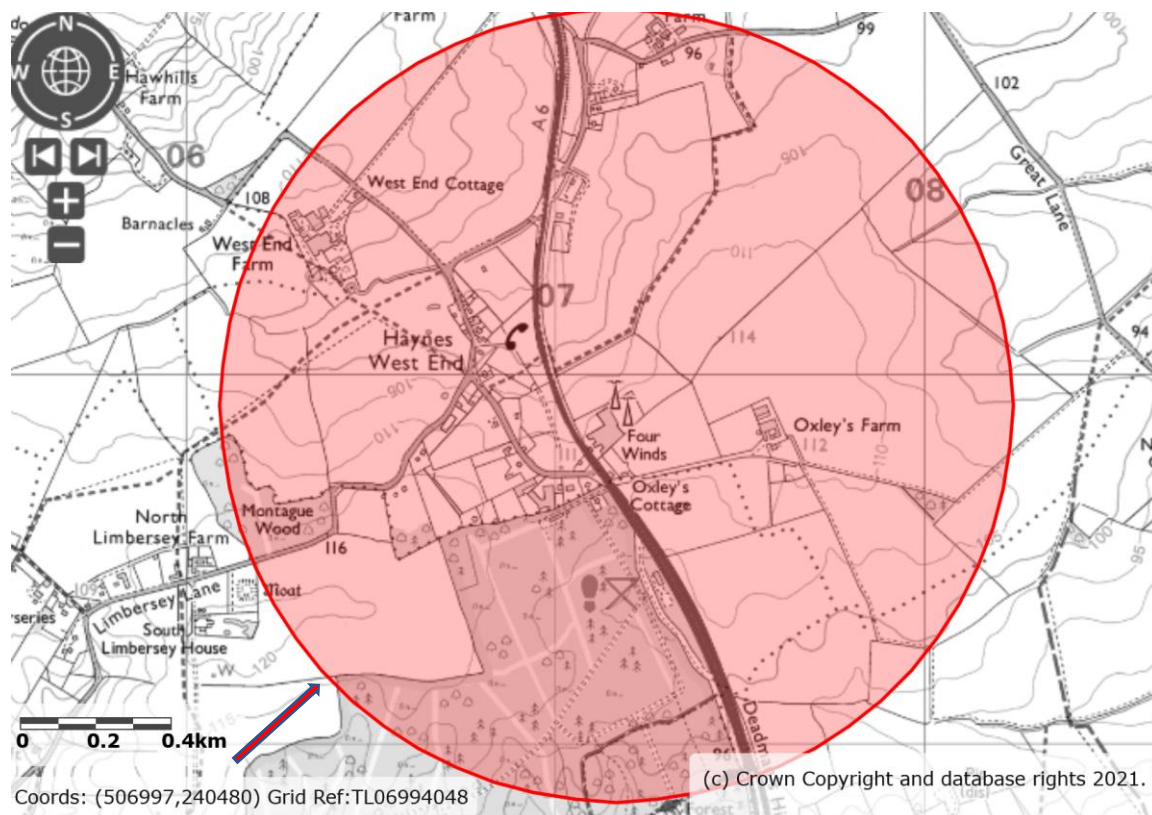
Number	ENTYRE GROUP LIMITED - 008
Title	Site Drainage Plan
Date	1 st February 2021



Notes

- Drain cover (Manhole)
- Separator/Receptor tank
- Main Site collection tank (all waste water for the site is collected here)
- - - Drain
- Water & Electricity input to site

Appendix 3 ENTYRE GROUP LIMITED (4 Winds) – Sensitive Receptors



Notes:

The 'Red Circle' defines a radius of 1 km.

Sensitive Receptors:

ENTYRE GROUP LIMITED – 002
This drawing shows the details of residential and commercial properties within the RED circle.

Wind direction (Red Arrow)

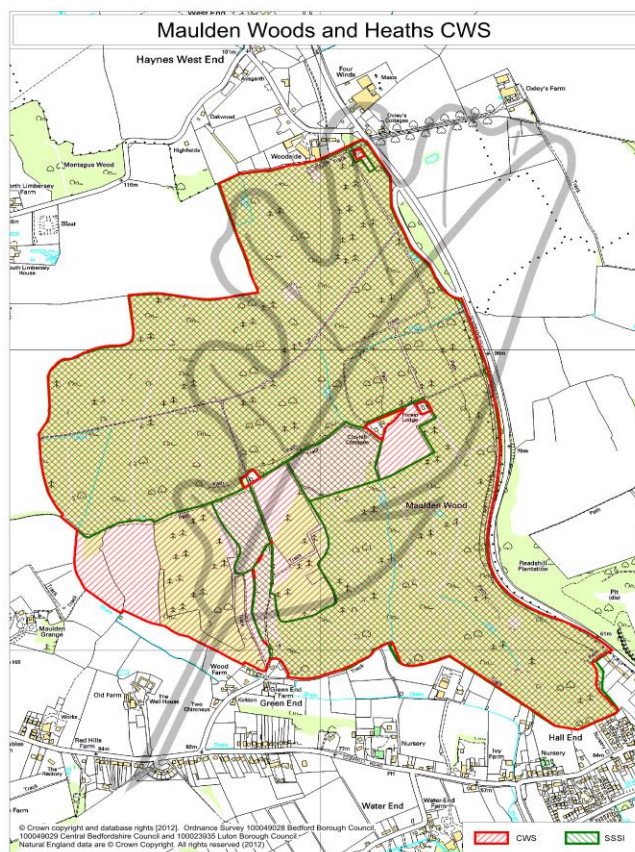
The prevailing wind direction would take smoke away from any residential area.
The 'normal' direction of the prevailing wind (South Westerly)

Watercourses

None within the 1 km target area

Nature & Heritage Conservation sites

See attached drawing from Beds & Luton Biodiversity Recording & Monitoring Centre.



2 - THE PREMISES

<p>Name: ENTYRE GROUP LIMITED</p> <p>Address: 4 WINDS Industrial Estate, Bedford Road Haynes West End, Bedfordshire, MK45 3QT</p> <p>Tel No: +44 01908 271404</p> <p>Grid Reference: TL 07 150 39861</p>	<p>Informative Message</p> <p>Use: Truck tyre casing sorting & storage.</p> <p>External site: 180m long, 50m (Av) wide</p> <p>Site area: Approximately 2.2 Acres</p> <p>Site Drawings: ENTYRE GROUP LIMITED 001 & 002</p>
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<p>Route from nearest main junction. A6/A507 Roundabout, Clophill Grid Ref of junction: TL 08 175 37586</p>
<p>From A6/A507 Roundabout Clophill take the A6 North for 3 kms to LH turn to Haynes West End, the entrance to the 4 WINDS Industrial Estate is 50m further north on the A6 past the junction & on the RH side of the A6.</p>

THE SITE	
Exterior site	<p>Waste area (NE of the site) enclosed on 3 sides by a concrete wall comprising of 3 interlocking panels each 6mL x 1.2mH x 180mmD which provides an approved 2hr fire protection. On the 4th side there is a 2.4m high metal palisade fence.</p>
Approximate area: (m²)	<p>8,900 m² (approximate) or 2.2 Acres See drawings: ENTYRE GROUP LIMITED 001 & 002</p>
Automated fire detection systems, suppression and water containment	<p>ENTYRE GROUP LIMITED will install: A camera based flame detection system providing proactive advanced detection that spans the complete waste tyre stacks area. This system provides 24/7 monitoring by a 3rd party to ensure coverage during periods of non occupancy The flame detection cameras are programmed to raise the alarm (audible alarm in both the site and office during working hours and within the security monitoring during out of hours) when a single flame is detected. (Truck tyres ignite at circa 400 Deg C and after several minutes of sustained application of the heat source)</p> <p>Enquiries with Bedfordshire Fire & Rescue have established the location of a hydrant between the A6 trunk road and the SE corner of the site (Close to the site fire assembly point [FA]) See ENTYRE GROUP LIMITED – 002 The delivery pressure available at this hydrant has been checked by the fire service. Details: 150mm service main delivering 375 psi of water</p> <p>In addition to the use of water it is proposed to use an encapsulater (wetting agent) product (F-500 EA), this product falls under the classification designed for Class A type fires, and was successfully demonstrated to the F&RS and MOD at a demonstration at Manston Airfield. The proposal is to have the solution available on site with a suitable manual delivery system, the solution will be premixed in a 45,000 ltr storage tank. The worst case scenario is that a</p>

	<p>single stack is engulfed in flame, this could be extinguished within 30 mins using 31,500 ltrs of 1% solution. Initially after the detection of a flame there will be strategically located F-500 EA filled fire extinguishers (see site drawing) to deal with the early stages of any fire development.</p> <p>Fire extinguishers (Type A Fires) to be positioned and clearly signed as shown on ENTYRE GROUP LIMITED 001 (FX = 4 extinguishers)</p> <p>In the event of a major incident where water is used internally the following actions will be taken to mitigate the run off of polluted water</p> <p>The waste area is enclosed on 3 sides by fire retardant walls (2hrs). Each stack is separated from its adjoining stack by a 5m gap. No building is closer than 5m (see ENTYRE GROUP LIMITED 001) The palisade fencing is approximately 35m from the nearest stack</p> <p>The site will be located on impermeable concrete and will be surrounded by permanent concrete/brick wall and temporary bunds (spill barrier) to retain any fire water. Temporary bunds (spill barrier) will be stored as described on the site drawing, in easy access containers. Neoprene drain covers will be stored on site to seal off the drains to prevent any contaminated water entering the water course should there be an incident.</p>
Staff Training	<p>Staff are competent in the use of:</p> <ul style="list-style-type: none"> a) the use of hand held fire extinguishers b) the use of the hose delivery system, and c) the operation of the temporary bunds (spill barrier) and neoprene drain bunds
Signage at the entrance to the site	<p>Signage at the site entrance to include: Company Name & Contact details 'Permitted by EA' with emergency & hotline numbers</p>
Electrical testing + additional installations	<p>All internal electrics are certified by an approved electrical contractor</p>

3 - MANAGEMENT OF WASTE

WASTE MANAGEMENT ACTIVITIES	
Storage of waste pending despatch to a re-treading or reprocessing facility.	Storage of whole waste truck & bus tyres.
Type of waste	End of life whole truck tyres
EWC code	16 01 03
Process	Unloaded and loaded manually from vehicles to site storage and/or stand trailers
Maximum time of storage	3 months. Waste tyres are received on site at the rate of approx. 60 tonnes/week The maximum storage capacity within the stacks = 500 tonnes Waste tyres are acquired to meet the requirements of the UK re-tread industry and those requirements are clearly defined by dimension. The throughput of waste is balanced ie over a 12 week period the input would normally mirror the output The process to ensure stock rotation is as follows: <ol style="list-style-type: none"> 1. Each waste stack location is allocated a number 2. The location has an individual log of input vs output and reviewed every 4 weeks. Over the full 12 week period the stock will have fully rotated 3. The site operations manager will be responsible for signing the individual locations within the 12 week period
Maximum capacity of site storage	500 tonnes or circa 10,000 tyres The reality is that this would rarely exceed 9,000 tyres and the quantity on site at any given time is monitored.
Storage of waste	Waste will be stored in stacks 20m x 5m x 3m H and separated by a 5m gap. The site is surrounded by fire retardant walls (2hrs) on 3 sides with a metal palisade to the 4th side. The nearest building being a minimum of 5m from any one of the stacks. Storage Waste Stacks ENTYRE GROUP LIMITED - 001
Maximum volume of external waste piles	300 m ³
Location of stored waste piles	Yard area (outside). The number of waste piles is shown in: Storage Waste Stacks ENTYRE GROUP LIMITED - 001
Maximum size of each waste pile	20m long 5m wide 3m high
Minimum separation of each external pile	Stacks will be placed against the outer walls as they are manufactured from interlocking concrete with approved sealant between the joints creating a 2 hr fire safety feature. Each stack will be separated by a 5m gap and be 0.6m lower than the height of the wall to prevent fire wicking over the top of the wall.
In the event of a major incident	The following actions would be initiated in the event of a major incident, these actions are designed to mitigate the effect of contaminated water run off. <ol style="list-style-type: none"> a) Surface water would gather on the site due to the surface design being impermeable concrete. The drains within the site would be covered with neoprene drain bunds (covers) to prevent the exit of contaminated water. b) Specifically designed 'polyurethane bunds' (spill barrier 90 mm high) would be deployed across the vehicular entrances/exit.

- c) The SW exterior of the site will have a metal palisade fence on top of a 0.5m retaining wall to completely seal the site.

The waste storage part of the site is circa 4,400 m² (1.1 acres), thus with a minimum kerb height of 90 mm this provides a maximum containment of 396 m³ of water. NB 1 m³ = 1000 Ltrs)

The worst-case scenario is that 1 waste pile is completely alight:

Using water: 2000 Ltr/min for 3 hrs = 360,000 Ltrs or 360 m³ of water

Using solution: 30,000 ltrs of solution or 30 m³ of water/solution mix.

This is within the capability of the designed water retention features.

4 – PRIMARY FIRE HAZARDS

PRIMARY HAZARD INFORMATION – STORAGE OF WASTE TYRES

HAZARD NO	TYPE & AMOUNT	LOCATION	FURTHER INFORMATION	HAZARD (In the event of a fire)
1	Waste Tyres external storage 10,000 units (max) Approximately 500 Tonnes Quantity of waste tyres per external location is shown on the drawing (Storage – Waste Tyre Stacks. ENTYRE GROUP LIMITED - 001)	Contained within 8 separate stacks, surrounded on 3 sides by fire retardant concrete walls 3.6m high & 180mm thick (2hrs). The gap between each stack will be a minimum of 5m and the stacks will not be located nearer than 5m from any building.	Waste tyres stored in the stacks will not exceed 300m ³ of product which will be stacked polo style. 300m ³ equates to circa 1250 tyres dependent upon dimensional mix. Additional Notes: Maximum storage time for each stack 3 months. Working area, continually manned, stock defined as 'work in progress'	There is no factual evidence to support the self-combustion of whole truck tyres. The most likely cause of a fire would be arson. If a fire was to happen the major risk would be toxic gasses from burning rubber, plus the risk of water contamination if the F&RS choose to use water direct to flames.
2	Waste Tyres on curtain sided or solid box trailers awaiting unloading or despatch. 2 vehicles = 500 possible waste tyres. (250/vehicle)	Storage within curtain sided & solid box trailers awaiting despatch.	In the event of fire, trailers will be isolated as they are a min of 6 mtrs from any waste tyre pile or building and would have a fire retardant exterior wall to one side.	Low risk of fire.

5 - FIRE PREVENTION

PREVENTING FIRES – MINIMISING RISK	
Fires on site	There will be no burning of waste on site.
Smoking	Formal NO SMOKING policy in place with smoking only permitted in a dedicated area on site, located in an area away from combustibles with flameproof receptacles for waste. NO SMOKING signs at the main entrance to the site. Designated smoking area.
Hazards introduced by contractors and building works	Hot work only allowed as a last resort and then subject to strict conditions. All contractors will have to undergo an induction prior to commencement of work, clear descriptions of work to be carried out will be issued ie Contractors permits to work.
Manual fire extinguishing appliances	Fire extinguishers are located throughout the facility. <i>See site map: FE = Fire Exits FX = Fire Extinguishers</i> <i>NB Fire extinguishers will be located at 4 locations</i>
Vehicle fire extinguishers	All commercial vehicles entering the site will have appropriate fire extinguishers fitted
Staff readiness and training	All staff given <i>Fire Awareness training</i> at induction stage. Good Housekeeping is encouraged with reference to litter, but particular attention to combustible litter. End of day litter & fire watch check to be completed. Fire assembly point is outside the main vehicle entrance/exit (ENTYRE GROUP LIMITED 001).
Quarantine Area	See site plan (ENTYRE GROUP LIMITED 001).
Site security	The site is occupied from 8.00am until 5.30pm Monday to Friday & 8.00am to 12.30pm on Saturday The premises are covered by CCTV. The site is kept secure by a metal mesh fence and gates.
Signage	All exits clearly signed

ACTIONS IN THE EVENT OF A FIRE	
Authorised persons	Director – Paul Bruce. Site Operations Manager - TBC
Main Access to Site	Road access direct from the A6 and along the site road direct to the site entrance (approximately 90m) (ENTYRE GROUP LIMITED 001 & 002).
Fire Appliance access	As per the main access to the site
Maximum number of persons on the site at risk in the event of a fire	Maximum 6 (Average mobility)
Staff Evacuation	On hearing the fire alarm, all staff will evacuate the site and proceed to their designated assembly points outside the main entrance (ENTYRE GROUP LIMITED 001).
Staff actions in the event of fire	<ul style="list-style-type: none"> a) Fire in a stockpile: Trained staff to deploy fire extinguishers or main fire water supply. If situation assessed as dangerous, evacuate area and await the Fire & Rescue Service b) Fire in a Trailer: Using the 'shunt' vehicle remove non affected trailers in the vicinity, to the site road (ENTYRE GROUP LIMITED 001). Trained staff to deploy fire extinguishers or main fire water supply. If situation assessed as dangerous, Evacuate area and await the Fire & Rescue Service

6 - MECHANICAL HANDLING EQUIPMENT

Mechanical Handling Equipment (MHE)	
MHE used on site? 2 Rough Terrain FLT – Diesel (Diesel Supply tank situated off waste tyre site)	YES
MHE driven by trained operators only? (Training includes statutory pre use checks, instructions on what to do in event of an MHE fire etc.)	YES
MHE serviced regularly? (500 hours or 3 months minimum requirement) – These will be new vehicles purchased/leased specifically for the location and will be subject to manufacturers maintenance schedules which will be available for inspection.	YES
Any equipment likely to cause sparks ie bucket loaders etc FLT's are equipped with reach poles for carrying whole tyres, poles are set at ground level when machine is unattended	NO

7 – INTERNAL AREA (CANTEEN) Located in the larger building (ENTYRE GROUP LIMITED 001)

CANTEEN AREA	
Measures taken to prevent fires as a result of use of equipment in this area 1 canteen / kitchen: Fridge (1), Microwave (1), Kettle (1), Toaster (1), Water Dispenser (1)	
Equipment is properly maintained? e.g. PAT tested	YES
Suitable extinguishing appliances located within the canteen area?	YES
Signage – All exits clearly signed	YES

8 - FIRE SAFETY

MANAGEMENT OF FIRE SAFETY	
Competency Accreditations	WAMITAB Original document + latest Continued Competence filed
Fire safety management:	Nicola Doyle – Office Manager
Deputy:	Site Operations Manager
Competent person(s) appointed to assist in undertaking the preventative and protective measures (i.e. weekly fire exit and fire extinguisher checks, etc.) Doors and fire extinguisher – Operations Manager	YES
Are there suitable arrangements for summoning the Fire and Rescue Service?	YES
Are there suitable arrangements to meet the Fire & Rescue Service on arrival and provide relevant information, including that relating to hazards to fire fighters? Copy of fire plan located in main building and with Beds F&RS	YES
Is there a plan of the site available indicating basic layout and any areas of significant risk?	YES
Are there suitable arrangements for ensuring that the premises have been evacuated? Assembly point where staff numbers are checked	YES
Is there a suitable fire assembly point(s)? Outside main entrance/exit (ENTYRE GROUP LIMITED 001)	YES

9 – TRAINING & DRILLS

TRAINING AND DRILLS	
Fire safety training is managed by:	Nicola Doyle – Office Manager
Deputy or assistant:	Site Operations Manager
Are all staff given adequate fire safety instruction and training on induction?	YES
Are all staff given adequate periodic 'refresher' training at suitable intervals? 1 per year for each staff member	YES
Are all staff with special responsibilities (e.g. fire wardens) given additional training on:- (Designated person to attends a specific 'Fire Marshall Course')	
<ul style="list-style-type: none"> • Fire risks within the premises? 	YES
<ul style="list-style-type: none"> • The general fire precautions on the site? 	YES
<ul style="list-style-type: none"> • Action in the event of a fire? 	YES
<ul style="list-style-type: none"> • Action on hearing the fire alarm signal? (weekly tests) 	YES
<ul style="list-style-type: none"> • Location and use of fire extinguishers? 	YES
<ul style="list-style-type: none"> • Means for summoning the fire and rescue service? 	YES
<ul style="list-style-type: none"> • Identity of persons nominated to assist with evacuation? 	YES

10 - ENVIRONMENTAL MANAGEMENT

ENVIRONMENTAL PROTECTION	
Source of pollution <i>Low Risk</i>	Waste tyres are unlikely to give rise to odour, littering or pest problems. The site operations generate low noise levels.
Pathways for run off	Impermeable site surface-fire water contained within site. Walls/Spill bunds/Neoprene drain bunds
Receptor sensitivity	Immediate location within 100 mtrs – Units contained within the 4 WINDS Industrial Estate & adjoining property to SE of site Wider area, up to 1 Km – Residential & commercial properties see attached map (Appendix 3)
Site Design – fire water containment	The site (ENTYRE GROUP LIMITED 001 & 002) is enclosed on the NW, NE & SE side by a permanent 3.6m high x 180mm thick fire retardant wall (2hrs). On the SW side there is a combination of small wall approx. 0.5m high with a 2.4m metal palisade fence on top and a temporary removeable 90mm polyurethane bund (spill barrier) to be placed across the entrance/exit in the event of an incident, creating a sealed site to contain water used to extinguish any fire. The site is surrounded by agricultural land on 2 (NE & SE) sides with an industrial site to the NW and warehousing proposed for the SW. The nearest building being a minimum of 20 mtrs.

11 - TESTING MAINTENANCE & RECORD KEEPING

TESTING AND MAINTENANCE	
Testing and Maintenance is managed by:	Nicola Doyle – Office Manager
Deputy or assistant:	Site Operations Manager
Weekly testing of fire alarm (day / time and is it displayed)?	YES
Annual maintenance of fire extinguishing appliances?	YES
Periodic inspection of external escape exits (main entrance/exit)	YES
Routine checks of final exit and/or security fastenings?	YES

RECORD KEEPING	
Appropriate records held for:	
Location of records	PB TYRES LLP (Bletchley)
Fire drills	YES
Fire training (H&S Teams)	YES
Fire alarm tests	YES
Extinguisher (regular and annual) inspections	YES
Means of escape (routes, exits, walkways etc.)	YES
FLT maintenance schedules	YES
Contractors permits to work to include 'Hot Working' procedures	YES
Building Electrics Certification	YES

**Appendix 4
(Summary Actions)**

Hazard	Potential Harm	Severity	Existing Controls	Additional Controls	Resp	Harm Factor	L/Hood	Rating
Fire - General	Burns Asphyxiation	Major	Fire drills & awareness training. Fire Alarm testing. No smoking policy. Housekeeping plan. PPE. First Aid	Training of fire marshals	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Medium	Possible	Low Risk
Fire Arson	Fire Damage	Major	Diesel isolated in separate area. Housekeeping plan-No combustibles around site. CCTV Site secured.	Installation of 24/7 CCTV system	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Medium	Unlikely	Low Risk
Fire Electrical Faults	Burns Smoke Damage	Major	Electrical cabinets and equipment, checked daily for faults. All faulty lights are replaced at the weekly housekeeping check.	Create and enforce weekly housekeeping checklist	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Minor	Unlikely	Low Risk
Fire Smoking materials	Burns Smoke damage	Major	Site non smoking policy. Housekeeping plan. Hazard reporting via site log.	Continued training of site personnel	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Minor	Unlikely	Low Risk
Fire Hot Work	Burns Smoke damage	Major	No burning, welding, grinding or cutting within 6 mts of any combustible material. Fire extinguishers & fire marshals available on standby for any operation.	Training & validation of onsite operatives to the policy	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Minor	Possible	Low Risk
Fire Open Burning	Burns Smoke damage	Major	Open burning of any material on site is PROHIBITED	Training & validation of onsite operatives to the policy	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Minor	Unlikely	Low Risk

Hazard	Potential Harm	Severity	Existing Controls	Additional Controls	Resp	Harm Factor	L/Hood	Rating
Fire External Storage Pile	Burns Asphyxiation	Major	Tyres are stored externally in fire specific stacks. Volume of tyres not to exceed 300 m3.	Flame detection camera system linked to a 24/7 alarm covers external storage area's	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Major	Unlikely	Low Risk
Fire Tyres Self Combust	Burns Asphyxiation	Major	Tyres are not prone to self combust. Pile rotation addresses the perceived risk	Rigid adherence to rotation plan.	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Minor	Unlikely	Low Risk
Fire Neighbours	Burns Asphyxiation Property Damage	Major	Industrial premises to the NW & SW. Agricultural land on all other sides. See sensitive receptor map	N/A	N/A	Minor	Unlikely	Very Low Risk
Fire water run off	Contamination of local agricultural land	Major	Secure bunds/walls around the site	Periodic maintenance of bunds/walls	Paul Bruce/ Nicola Doyle/Site Ops Mgr	Medium	Possible	Medium Risk

Appendix 5 (Check List)

1. Detailed **site plan(s)** showing:

- a) Hazardous materials stored on waste tyre site - **NONE**
- b) Access routes for fire appliances - **DONE**
- c) Access points around the site to assist fire fighting - **DONE**
- d) Any watercourse located near the site - **DONE**
- e) Location pollution control equipment and materials - **DONE**
- f) Location firewater containment systems or bunds - **DONE**
- g) Location of sensitive receptors in the vicinity of the permitted site including, schools, residential areas and workplaces within 1km of the site - **DONE**
- h) Compass rose showing north and prevailing wind direction - **DONE**
- i) Dedicated emergency or quarantine area large enough to cope with a major incident, with a clear area of at least 10 metres around the perimeter, (which must be available at all times) - **DONE**
- j) Detailed location of the waste pile(s), including dimensions and separation distances - **DONE**

2. Demonstrate measures are in place to prevent **self combustion** of whole truck & bus tyres stored on the site, including:

- a) Minimising pile sizes - **DONE**
- b) Demonstrating good stock rotation and how this is monitored - **DONE**
- c) Measures to detect and control hot spots, such as monitoring and turning of piles and trigger levels - **DONE**
- d) Flame detection monitoring - **DONE**
- e) Control and monitoring of maximum storage times - **DONE**

3. Details of **fire prevention techniques** used, including:

- a) Location of dedicated smoking area and distance to waste piles and flammable materials - **DONE**
- b) Site electrics are fully certified by a qualified electrician and provide a summary of the maintenance schedule - **DONE**
- c) Measures in place to reduce the potential for hot exhausts to act as a source of ignition - **DONE**
- d) Details of the documented maintenance procedure for plant and equipment, including what records are kept, where these are located - **DONE**
- e) Implement a fire watch at the end of each shift - **DONE**
- f) Separation distances are observed between plant and combustible waste when the site is not staffed - **DONE**

4. Details of measures to **contain and mitigate fires**, including:

- a) Techniques used to minimise the risk of fire spreading within the site or from the site - **DONE**
- b) Fire fighting strategy - **DONE**
- c) Safe access to the site for the fire and rescue services and other emergency responders - **DONE**
- d) Details of the steps and procedures to be followed in a fire occurs on the site - **DONE**
- e) Demonstrate that there is an adequate volume of water/wetting agent to fight a fire in the largest stock pile - **DONE**

Copies	Environment Agency Bedfordshire Fire & Rescue Service	Date 1 st February 2021
Document Location	Reception - ENTYRE GROUP LIMITED 4 WINDS Industrial Estate, Bedford Road, Haynes West End, Bedfordshire, MK45 3QT	Date 1 st February 2021