



Think 3e Consortium Limited

Fire Prevention Plan

**Think 3e House,
15-21 Links Road
Finedon Road Industrial Estate
Wellingborough
Northamptonshire
NN8 4EY
EPR/BB3404KM/V002**



Basis of Report

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Annex 2 – Emergency Action Plan

Annex 3- Data Sheet CCTV

Annex 4- Decision Tree

Annex 5- Service Report & Certificate of Inspection

Annex 6- Interceptor Specification

Issue and Revision Record

Revision	Date	Originator	Description of Changes
V0.1	18/05/23	Olive Compliance	Updated FPP as requested by EA
V0.2	21/08/2023	JHudson	Amendments to address EA response dated 15 th August 2023
V0.3	29/03/2025	J Hudson	Amendments to add additional site area to support variation to Environmental Permit

Site Contacts and Emergency Information

Name	Contact
Fire Service Emergency	999
Fire Service (Local)	01604 797000
Police Emergency	999
Police (Local)	03000 111 222
Anglian Water	03457 145 145
Environment Agency	0800 80 70 60
North Northamptonshire Council	0300 126 3000
Health and Safety Executive	0300 003 1747
Operators	07960 954308- Marcus Baldry 07919 414908- Matthew Baldry
ENVA	01505 321 000

1 Introduction

This plan is designed specifically around site activities. Site operations will primarily be the acceptance and storage of household, commercial, and industrial wastes for recycling and recovery purposes.

This document is primarily to document the onsite control measures in place to reduce the risk of fire occurring and manage the risk of fire should it occur and any resulting environmental impacts.

2 Fire Prevention Plan

This FPP has been prepared in order to mirror the contents of the EA guidance for FPP to allow for ease of assessment and for users of this document to readily locate the specific information and on-site provisions relating to each particular topic.

Fire Prevention Objectives

This FPP identifies measures to be employed to reduce the likelihood of fires at the site. In addition, the plan identifies measures to be employed in the event of a fire in order to limit the damage caused to the environment or human health.

As such, and in accordance with EA guidance, the objectives of this FPP are to:

- minimise the likelihood of a fire happening
- aim for a fire to be extinguished within 4 hours
- minimise the spread of fire within the site and to neighbouring sites

3 Exclusions

The EA guidance for FPP states that the guidance does not apply to:

- hazardous wastes
- dangerous substances (i.e. those under Control of Major Accident Hazard Regulations)
- combustible liquids

4 Types of Combustible Wastes

Within the T3E management system the below combustible waste types are received into site

- Plastics
- Cardboard/Paper
- Metal
- Wood
- Metal
- Food Waste
- WEEE

Section 9 of this document details the associated storage arrangements.

Details of other combustible, non-waste materials on site are detailed within Section 7 and their locations are added to the site plan (Drawing 003).

5 Use of this document

This FPP forms part of the environmental management system for the site. It is prepared for use as a standalone document, such that all staff can easily refer to any information or operational requirements that relate to the prevention of fire or the procedures that are in place in the event of a fire.

The existence and location of the FPP is notified to all staff and will be readily accessible, in both hard and electronic copy, at all times, including during an incident. The plan and associated emergency contacts and site plan are stored in the site weighbridge/office (Emergency Pack).

All visitors and contractors to site will be given a Site Induction and a copy of the Site Rules which they will sign to confirm their understanding. The Site Induction will ensure that visitors and contractors know what they must do to prevent a fire occurring and what to do during a fire if one breaks out. The locations of the Emergency Pack will also be confirmed.

Training

All staff will be trained on the contents and requirements of the FPP (suitable to their role) and site inductions will include a summary of the FPP and notices of its location. A record of any training including any refresher or Toolbox talk will be recorded and signed off by all staff.

All staff are provided with information and training on fire prevention, protection requirements and action to be taken in the event of fire. New members of staff are given information or training on:

Procedures and their personal responsibilities to prevent and protect against outbreaks of fire.

- What action to take if they discover a fire;
- How to raise the alarm, the location of manual call points, and the procedure for contacting the Fire and Rescue Service and the EA;
- What action to take immediately on hearing the fire alarm;
- The location and safe use of portable or other fire extinguishing equipment;
- The location of escape routes from their place of work including those routes not used regularly for normal access and egress;
- Their responsibility to direct or escort visitors and contractors in their charge to escape routes (and in the case of disabled persons to the nearest useable escape route or refuge);
- The importance of keeping closed all fire doors to limit the spread of fire, heat or smoke;
- How to safely isolate or shutdown plant or equipment, where appropriate;
- The importance of good housekeeping in preventing the outbreak of fire and limiting its effects.
- Fire safety and emergency information for visitors and contractors will be provided at reception where they are required to sign-in.

Document Testing and Review

Quarterly exercises will be carried out to test how well the fire prevention plan works.

Exercises will be planned to test specific aspects of the fire prevention plan throughout the year to ensure effectiveness.

Such tests may take the form of physical drills or desk-based assessments as relevant to the element of this FPP that is under test. The nature of each test, the results, and appropriate actions (including where no action is required) will be maintained for inspection by the EA, on request.

This fire prevention plan will be kept under regular review with monthly external audits conducted on fire prevention measures on site and review of compliance with this document.

This document will be revised if where necessary for example if:

- there is reason to suspect it no longer meets the objectives of the guidance
- the site has had a fire or identify a near miss of a fire
- changes in site activities
- the environment the site operates in changes, for example if a school or residential development is built nearby
- The EA ask the company to revise it due to some concern over the risk posed by site operations

Any revised document will be sent to the EA for approval.

6 The Site

Site Activities

Waste management activities at the site will be authorised by a Bespoke Environmental Permit EPR/BB3404KM/V002. The site operates as a waste treatment and transfer station.

T3E permit allows the site to carry out the below activities by varying the permit to allow the acceptance of HCl wastes (as defined under Annex II of the Waste Framework Directive can be summarised below).

- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
- D14: Repackaging prior to submission to any of the operations numbered D1 to 13
- D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12
- R3: Recycling/reclamation of organic substances which are not used as solvents
- R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials
- R5: Recycling/reclamation of other inorganic compounds

The annual permitted tonnage will be 50,000 tonnes.

Site Plans

Site Layout

The site layout, in respect of fire prevention, is shown on Drawings 003 (Site layout). This layout highlights the following;

- the layout of buildings
- all permanent ignition sources on site and show they are a minimum of 6m away from combustible and flammable waste
- any areas where the operator is treating or storing combustible waste or combustible non-waste material
- all separation distances
- access points around the site perimeter to assist firefighting
- hydrants and water supplies
- areas of natural and unmade ground
- storage areas with pile dimensions and fire walls, including wastes stored in a building or containers
- the location of fixed plant and mobile plant when not in use
- the location of spill kits
- the quarantine areas

Operational Hours

The site operates 24 hours a day 365 days per year.

Site Location and Receptors

The site (centred at SP9022169692) is located at Think 3e House, 15-21 Links Road, Finedon Road Industrial Estate, Wellingborough, Northamptonshire, NN8 4EY.

FPP guidance states that consideration must be given to sensitive receptors such as;

- schools, hospitals, nursing and care homes, residential areas, workplaces
- protected habitats, watercourses, groundwater, boreholes, wells and springs supplying water for human consumption.
- roads, railways, bus stations, pylons (on or immediately adjacent to the site only), utilities, airport

Site Location

The site located within Finedon Road Industrial Estate, off Links Road (See below image 1 and table 1).

Image 1 - Site Setting

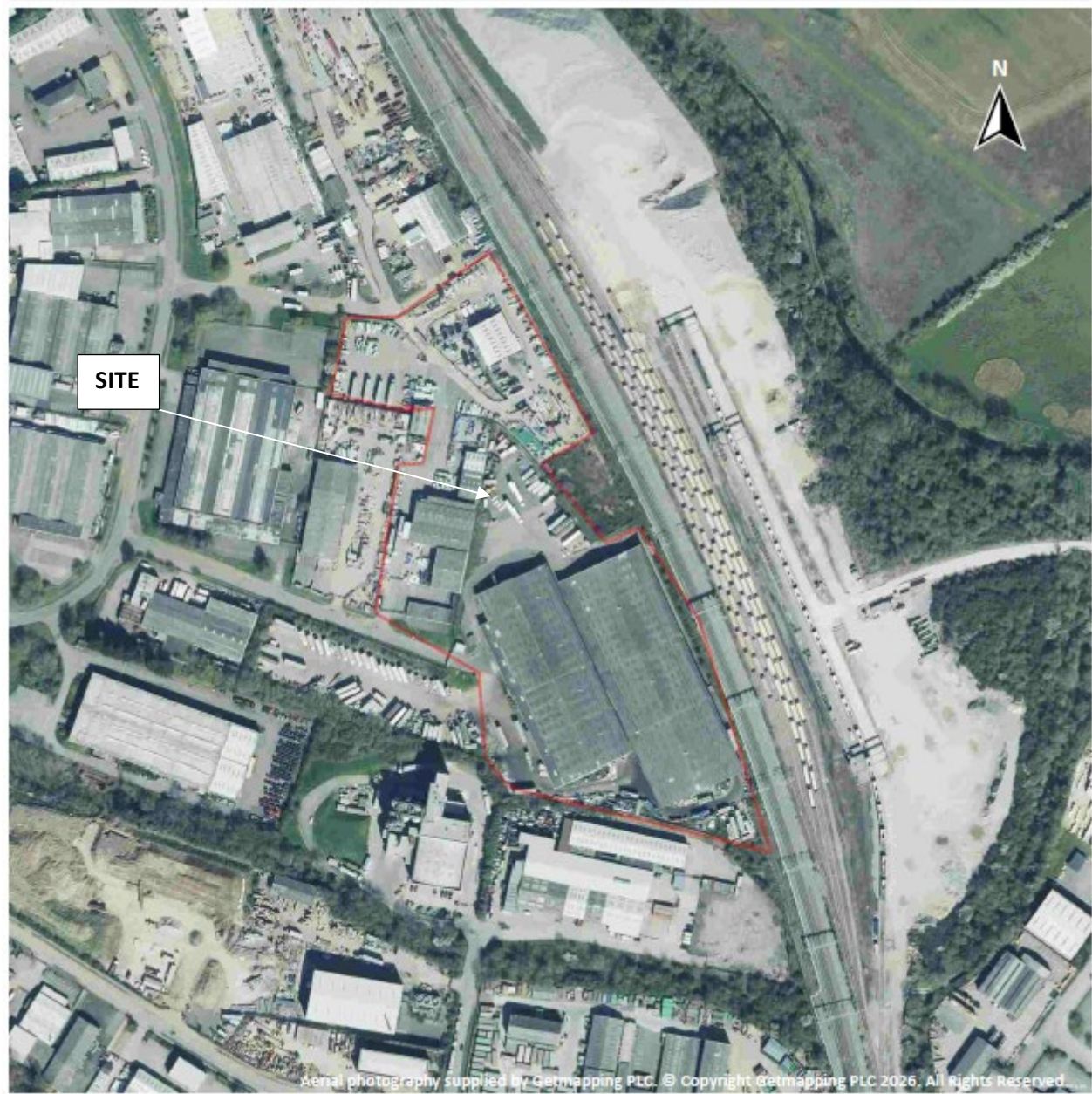


Table 1 – Site Setting

Direction	Use
North	Commercial/Industrial
South	Commercial/Industrial
East	Commercial/Industrial
West	Commercial/Industrial/Residential

Site Receptors

The closest residential receptor, residential housing estate located approximately 603m to the southwest of the site. Sensitive receptors identified within this document are shown on Drawing 004.

Table 2 below details the sensitive receptors, distance from the site and contact details.

Table 2 – Sensitive Receptors

Receptor	Distance (m)	Contact Telephone Number	Advice
Cygnets Pre-School	Southwest 886m	01933 673882	Staff to contact via telephone to advise any occupiers to close windows and doors. Await further instruction from Emergency Services.
Rail Link	East 115m	East Midland Railway- 0845 712 5678	Await further instruction from Emergency Services.
Compass Church	South 85m	N/A	Staff to contact via telephone to advise any occupiers to close windows and doors. Await further instruction from Emergency Services.
Central Park	Southeast 990m	N/A	Await further instruction from Emergency Services.
Guillemot Park	Southwest 999m	N/A	Await further instruction from Emergency Services.
A510 Road	South 300m	Highways Agency 0300 123 5000	Await further instruction from Emergency Services.

European/International Sites

Searches on the Multi Agency Geographical Information for the Countryside (MAGIC) website confirm there are no Sites of Special Scientific Interest (SSSI).

There is no special area of conservation (SAC), special protection areas (SPA) or RAMSAR sites within 1km of the site boundary.

Other receptors

None of the following receptors have been identified within 1km of the proposed permit boundary.

- National Nature Reserves;
- World Heritage Sites;
- Registered Parks and Gardens;
- Area of Outstanding Natural Beauty;
- Woodland Trust Sites; and
- National Forest.

Major Roads and Transport Links

There is an East Midland Railway line within 1km (115m) of the east of the site boundary. The nearest major road is located 300m south of the site boundary, A510.

Flood Risk

Checks made on the Environment Agency Flood risk website has identified that the site is in an area that is of very low risk of flooding. Very low risk means that this area has a chance of flooding of less than 0.1% each year.

Water courses

The nearest water course to the site is the River Ise (248m) northeast of the site.

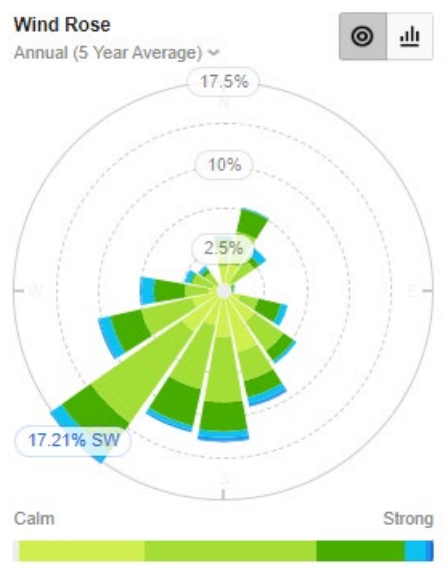
Prevailing Wind Direction

Using the Willy Weather application, meteorological forecast information is available for over 45000 British locations. The available data includes Met Office weather radar, satellite images and synoptic charts. The application also provides current conditions and warnings.

Upon review of historic wind data, the prevailing wind directions are predominately west south westerly in respect of the site.

Given the prevailing wind, the receptors that could principally be affected by fire at the site would be the railway line and rural areas situated directly to the east north easterly of the site.

Image 2– Wind Direction Average 5 year data- Northamptonshire



Live data can be accessed at any time using the Windfinder App (<https://www.windfinder.com>) searching under Northamptonshire weather station, to make an assessment of current weather conditions, wind direction and speed. This can assist in the event of a fire on site in order to assess impact on local receptors and to make contact with authorities and appropriate persons.

Weather monitoring is assessed throughout the day and formally recorded daily, as part of the daily site checks.

7 Managing Common Causes of Fire

Arson/Security

The site has a number of security measures in place to limit the likelihood of arson or vandalism listed below.

- 2.4m palisade security fencing;
- Gate house with barrier;
- Lockable site palisade entrance gates (2.4m);
- CCTV cameras;
- Inspection and maintenance procedures;
- Visitor sign in system; and
- Site operates 24 hours, 7 days a week, 365 days a year.

Access to the site is via one entrance/exit.

Visitors to Think3e must sign in and out via the visitors register located in the site gate house.

The site security system CCTV cameras covers external and internal operational areas on site. CCTV cameras cover all operational waste storage areas as shown on drawing 003.

There is always a member of senior management or staff on site at all times.

Perimeter inspection is undertaken on a daily basis and any repairs temporarily made good by the end of the working day. Arrangements are made to have permanent repairs, if required, completed within one week. Any defects and repairs are recorded.

A regular fire watch is conducted on all waste storage areas and plant by the Operator or nominated member of staff, during daily checks and at the end of every shift.

Key holders are present on site at all times.

Plant and Equipment

Plant and equipment are maintained in accordance with the manufacturer's recommendations and recorded on daily check sheets.

Plant and equipment are operated in accordance with the manufacturer's instruction manuals.

Induction training and refresher training is provided, to all persons engaged at the site, in the safe operation of plant and equipment relevant to their role.

Inspection of plant and equipment is undertaken on a daily basis to check for faults and ensure appropriate safeguards are in place. Designated forms for the checking and defect records for all vehicles and plant are completed and forwarded to the Operator for checking and review.

Regular cleaning is conducted on all operation plant. This is recorded when completed on plant inspection forms.

When plant and equipment are not in use, they are stored 6m away from stockpiles of combustible materials.

In the event of a failure or suspected fault with an item of plant or piece of equipment, the relevant persons ensure that the equipment is shut-off in a safe manner and not used until the equipment can be repaired or replaced. Defects are reported to senior site management for appropriate action to be taken.

Electrical Faults

The electrics on-site are certified by a suitably qualified electrician.

Regular safety checks and daily site inspections are recorded in the site diary. Periodic inspections will be undertaken by a suitably qualified electrician on an annual basis.

Any potential ignition sources from suspected electrical faults should be isolated and an electrician should be contacted immediately.

The inspection frequency will be based on recommendations from the electrician or where a potential risk is identified via the daily site inspections.

PAT testing of portable equipment will be checked on a yearly basis.

Discarded Smoking Materials

Smoking is authorised within the permitted area, 6m away from any combustible materials, area as shown in drawing 003.

Hot Works

The company operates a permit to work system. No hot works are not generally undertaken.

In the event hot works are required, they are only undertaken by staff who are trained, and by contractors who have the relevant permit to work.

Works must be completed within 2 hours of an operational day.

A fire watch is provided continuously during the works, including breaks, and one hour after completion. Once works are complete, they will be signed off by the Operator or Nominated person.

Industrial Heaters

Industrial heaters will not be used on site.

Hot Exhausts

Vehicles are turned off when not in use.

Flammable/combustible materials are stored in designated areas away from frequent vehicle movements (as far as is reasonably practicable).

A fire watch of all on-site plant and equipment (including, if appropriate, transport vehicles) will be undertaken for at least 30 minutes following use and at the end of every shift.

Ignition Sources

Ignition sources will be kept at least 6m from any combustible waste stockpiles or other potential on-site fire hazards (e.g. diesel storage, oils, chemicals).

Ignition sources such as hot works, smoking, electrical equipment, plant and equipment, heaters and exhausts are detailed within the above sections.

Ignition sources may only be located less than 6m from a potential fire hazard where suitable fire walls/breaks are in place between the ignition source and the combustible material. The 6m buffer zones that will apply, in this respect, across the site are shown in Drawing 003.

Batteries

Batteries are occasionally accepted within WEEE and are permitted within the environmental permit.

Any waste containing damaged batteries will be segregated and placed into a quarantine skip away from any combustible waste, as shown on drawing 003, removal of damaged WEEE will be within 7 days.

Leaks and Spillages of Oils and Fuels

Spillages and leakages of fuels and oils (either from on-site vehicles or where such material is accepted in error) are prevented through maintenance in accordance with the manufacturer's recommendations as recorded in the Environment Management System.

COSHH assessments are carried out by the Operator to inform site staff of the risks of materials on site and control measures required when handling. These are kept in the site office.

Where a delivery vehicle (i.e. not under the control of T3E) is found to be leaking, that vehicle will be refused entry to site.

There are two bunded tanks, one to hold the capacity of 10,000 litres and the other to hold the capacity of 30,000 litres of White Diesel are located within the permitted area as shown on drawing 003 there is only ever 30,000 litres stored at any one time. They are locked and secure, and only accessible to T3E employees.

Storage areas for fuels are located away from daily general vehicle movements and are stored on an impermeable surface.

Maintenance oils and fluids are located outside of the permitted area with the car park as shown as shown on drawing 003.

Any spillage/leak of hazardous materials (including oils/fuels) at the site shall be treated as an emergency and immediate action taken to absorb or contain it using spill kits provided (See Drawing 003). The absorbent will be cleaned up as soon as possible and disposed of, as hazardous waste, by a suitably licensed contractor.

Spillage procedure within the site EMS supports the management, staff training and treatment of spillages. A non-conformance report is completed with the appropriate actions taken recorded.

Build-up of Loose Combustible Waste, Dust and Fluff

Staff are to remain vigilant for loose material, dust or fluff and should clean up such material on identification, placing such material in the correctly designated storage stockpile. Daily site inspections and general housekeeping of the site is also undertaken in order to minimise the potential for the build-up of such materials.

Plant, conveyers and equipment are checked daily and cleaned weekly to reduce the risk of trapped debris which reduces the risk fire.

Good housekeeping is practiced on site, keeping site equipment and surfaces clean and clear access free for plant and staff movement on site.

Reactions between Wastes

All wastes arriving onsite will be checked in accordance with the waste acceptance criteria to ensure no materials of unknown composition are accepted at the site.

Waste oils and fluids collected from vehicles only through repairs or general maintenance are to be stored separately within the designated tanks/vessels.

Unpermitted wastes will be quarantined within a skip/container if necessary and stored over 6 metres away from any waste stockpiles.

Deposited Hot Loads

All wastes are assessed both at the time of the receipt of an enquiry and as the material arrives at site.

On arrival, checks are made to ensure that no hot loads or smouldering materials are accepted by the site.

The quarantine area (fire prevention) will be used in the event that any hot load is received, in error, by the site.

Appropriate action will be taken, either the Fire Service contacted, or the waste will be allowed to cool, or a fire extinguisher used to dose a small fire or smouldering if safe to do so.

Neighbouring Activities

Checks made on the Public Register show that there are 10 permitted facilities regulated by the EA detailed below.

It is not felt any of the below activities pose any risk to T3E based on their location to T3E site.

Name	Site type	Permit Number	Distance (km)
A F G Transport Limited	SR2011 No3: Vehicle Depollution Facility <5000	DB3832AL	0.2
Grabhire4u Limited	A16 : Physical Treatment Facility	HB3100MJ	0.3

Veka Recycling Limited	A16 : Physical Treatment Facility	GB3802TJ	0.3
F & R Cawley Limited	A9 : Special Waste Transfer Station	JP3494NM	0.5
G R S Rail Services Limited	S0906 No 6: Inert & Excavation WTS with treatment	LB3733AF	0.5
Urbaser Limited	S0813 No 13: 75kte Non-hazardous & hazardous HWA Site	KB3008XS	0.5
W.J.Redden And Sons Limited	SR2010 No12: Treatment of waste to produce soil <75,000	BB3304LL	0.7
North Northamptonshire Council	S1504 No 4: 75kte HCl Waste TS	LB3303GX	0.8
John Redden Limited	A20: Metal Recycling Site (mixed MRS's)	KP3095NQ	0.8
Pro - Active Asbestos Control Limited	S0809 No 9: Asbestos Waste Transfer Station	FB3306SA	1.0

Checks made on the Public Register show that there are 5 registered waste exemptions facilities regulated by the EA detailed below.

It is not felt any of the below activities pose any risk to T3E based on their location to T3E site.

Name	Exemptions	Registration Number	Distance (km)
Linde MH UK Ltd	S1, S2, S3	WEX255960	0.2
Linde Material Handling East LTD	S1, S2	WEX247706	0.3
Grabhire4u	T5, U1	WEX272467	0.4
Travis Perkins Trading Company Limited	U4	WEX266446	0.5
Intercounty Truck and Van Limited	S1	WEX364206	0.6

8 Prevent Self-Combustion

Manage storage time

Robust stock pre-acceptance, acceptance, tracking, and management systems are in place such that no delivery is accepted at the site that would result in an exceedance of the permitted storage and/or processing capacity. All deliveries to the site are scheduled in advance of arrival on site. As deliveries are scheduled, it enables the site to ensure that there is sufficient storage capacity available and to comply with stockpile capacities.

Site Activities

The company operates a waste treatment and transfer station, providing a waste management service for retailers for storage of products, reuse of products and or a facility where waste can be recycled.

The site aims to operate as such combustible materials received, are processed, and segregated on the day of receipt.

Site use a decision tree to determine where and how material will be handled and stored, see annex 4.

Once material has been determined as waste it will then be sorted and segregated, bulked, or bailed into the relevant building, under cover within the canopies or in a stockpile within the permitted area. Waste retention time of approximately 4-12 weeks. No combustible waste will be stored for longer than 3 months.

To achieve good stock rotation and ensure the implementation of the “first in-first out” principle. Waste will be weighed in on the weighbridge and stock will then be unloaded via forklift into the designated building/area as shown on drawing 003.

Due to customer demands and requirements, waste types will and can vary at any time. Wastes stored in buildings and marked on Drawing 003 may be subject to change and cannot be specified on a permanent basis for waste types.

The site standard operating procedure requires that daily incoming waste is accepted sorted and segregated every day as best practice.

All movements of waste incoming and outgoing the site will be recorded and available for inspection by the Environment Agency upon request.

Pre-Acceptance and Acceptance Wastes

A strict pre-booking system is in place for all collections and drop-offs. The customer contacts the operator to confirm availability, T3E will then arrange collection from the customer.

There is a pre agreement in place with the customer regarding the types of waste/material that will be accepted onto site to ensure T3E are compliant with the environmental permit.

Waste is delivered to site by company vehicles. Vehicles are loaded with barrels/storage trolleys and are wrapped in plastic.

The load is then visually inspected by the site operatives, this is to ensure that the waste descriptions and waste code on the waste transfer note are in order prior to the waste being unloaded.

Non-Conforming Waste

However, should the waste not conform with the waste transfer note, the Operator is informed. They will assess the waste and decide whether it can be accepted. The waste must either be rejected or given the appropriate waste description, EWC code with the paperwork updated.

If the waste is deemed unacceptable under the permit or due to contamination the waste must be quarantined prior to removal off site or reloaded immediately. A waste rejection note must be completed at this stage and the customer contacted.

The EMS details the waste acceptance, validation, and rejection procedures. The below procedures below cover the waste acceptance and rejection process.

- Waste Acceptance Procedure
- Waste Rejection Procedure
- Waste Rejection Record

Monitor and control temperature

EA guidance on FPP states that where on-site storage is proposed for longer than three months, additional measures will be required in respect of stockpile monitoring and control. No waste will be stored for longer than a three-month period.

Routine Daily Monitoring

During the day waste piles are visually monitored during the acceptance procedure and as part of the daily checks by site staff. Stockpile management is listed within the Daily Check sheet with all stockpiles checked to ensure compliance with the stockpiles detailed within this document.

Site staff are trained to detect signs of fire and hotspots, with the management of any signs of fire or hotspots carried out under the direction of the Operator.

Staff are to be vigilant for any signs of visual smoke or smouldering of wastes during the working day and should notify the Operator should they detect signs of fire.

Daily weather conditions and temperatures are recorded by the Operator or Nominated Person daily. This is recorded on the Daily Check Sheet. In the event there is a prolonged period of warm weather, additional weather inspections will increase in frequency, every two hours, to ensure the constant monitoring of all stockpiles.

End of Shift Monitoring

At the end of each shift a fire watch is conducted on the stockpiles, waste stored in containers and site plant and equipment. This is carried out 30 minutes prior to the end of each shift. Nominated staff will look for any evidence of smoke, heat, or smouldering.

Should this be detected, the stockpile or container will be assessed by the Operator whether to maintain visual monitoring or if the waste requires active fire measures such as water suppression. The use of fire extinguishers or water suppression would be implemented, or wastes can be placed into the designated fire quarantine area and separated to allow cooling. These checks are recorded and filed in the site office.

In the event of a fire, if safe to do so, the waste can be broken into, segregated to reduce the fuel source. Unburnt material can be placed in the quarantine areas for the purpose of separation.

These end of shift checks are recorded. These checks cover a site walk around and site closure measures including waste storage area checks, plant and equipment storage, security measures and the shut off electrical equipment.

Bank Holidays/Site Closure

The site is manned 24 hours a day, 7 days a week, 365 days a year.

In the event that the site will be closed/non-operational this will be recorded on the daily check sheet and supporting monitoring forms.

Reduce the exposed metal content and proportion of 'fines'

No fines are produced on site.

Scrap Metal wastes are stored in a designated stockpile as shown on drawing 003, these wastes are not expected to be flammable as they are uncontaminated metals recovered from the acceptance of incoming wastes/materials. Metals with any contaminants such as any plastic, rubber or wood attached will have this removed prior to storage within the stockpile. In the event of prolonged warm weather, the stockpile will be monitored every two hours and 'turned' to aerate to prevent any overheating.

Dealing with hot weather, heating from sunlight and monitoring temperature

During periods of warm weather, care will be taken to ensure that wastes do not increase in temperature resulting in combustion.

Waste can always be accessed to enable site plant to turn, spread or move wastes to cooler/shaded areas if required. This would be actioned in response to daily weather monitoring and visual daily inspections of stockpiles by the Operator (or trained nominated person).

Using the forklift, the waste should be broken into and the waste spread and to be aerated. Visual inspection of the waste should continue. Once cooled the waste should be turned and returned into the designated area.

Monitoring is conducted by the Operator or a nominated trained member of staff. Any findings or responses to fire/smouldering are recorded in the site diary and made available in the site office for information.

All waste (accept scrap metal) is stored within a building or under cover to reduce the effects from direct sunlight.

Contingency

In the event of any delay to the removal of material from the site, the Operator will contact the relevant 'waste receiver' to determine the anticipated length of the delay. If deliveries to the site are scheduled, for before the delay to exports is resolved, that would result in an exceedance of the storage capacity, or if such a delay could cause a breach of the limits to the waste storage time on-site, the Operator will contact the EA immediately.

In addition, in the event of a contract failure with, or closure of, a waste receiver (and its operations) that could result in the storage of material on-site for a long period, the Operator will contact the EA immediately.

In the event there is a major breakdown that effects site processing plant or equipment, the Operator take proactive action, consider ceasing waste acceptance and determine the anticipated length of the delay.

The EA will be notified, discussions between the site and the EA regarding actions and timescales in relation to the recommencing of site operations.

9 Management of Waste Piles

Pile Sizes

The EA FPP guidance state that maximum stockpiles for the below wastes must be in line with the below, table 3, to help prevent the risk of self-combustion and limit the scale of a fire if one breaks out.

All wastes are stored in their largest form.

These wastes are still in loose form more than 150mm in size.

Table 3
EA Stockpile Guidance

Waste Type	Loose and more than 150mm
Paper/Cardboard	750m ³
Plastic	750m ³
Metal	750m ³
Wood	750m ³
WEEE	450m ³

The Environmental Permit specifies that waste will be stored for no longer than 1-year prior disposal or 3 years prior to recovery. The site will not store any waste for any longer than 3 months.

Where waste piles contain a mixture of combustible wastes, the maximum stockpile size has been based on the minimum stockpile size 750m³.

The site layout allows for access to all external stockpiles when storing waste so a fire can be extinguished easily.

Wastes are stored by type awaiting segregation and sorting prior to processing or storage pre to removal off site.

Table 4 below details the current stockpile sizes by location. These are also referenced in Drawing 003.

Table 4 – Current Stockpiles, Location and Sizes

Waste Material	Location	Height (m)	Length (m)	Width (m)	Max Volume m ³	Storage Time
Internal – Waste Transfer Building						
Shed 1 Plastic	Internal Waste Transfer building	4.5	8	11	595m ³	4-12 weeks
Shed 1 Cardboard/paper	Internal Waste Transfer building	4.5	8	11	595m ³	4-12 weeks
Shed 2 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4- 12 weeks
Shed 2 Cardboard/paper	Internal Waste Transfer building	4.5	8	11	396m ³	4- 12 weeks
Shed 3 Food x 2	Internal Waste Transfer building	4.5	21	4	396m ³	4-12 weeks
Shed 4 Food	Internal Waste Transfer building	4.5	21	4	396m ³	4- 12 weeks
Shed 6 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4-12 weeks
Shed 7 Plastic	Internal Waste Transfer building	4.5	8	11	396m ³	4-12 weeks
Shed 9 WEEE	Internal Waste Transfer building	4.5	11.5	11.5	595m ³	4-12 weeks
Shed 9 Overflow- dried food	Internal Waste Transfer building	4.5	11.5	11.5	360m ³	4-12 weeks
Shed 10 Plastic x 4	Internal Waste Transfer building	4.5	4	17	306m ³	4-12 weeks

Shed 11 Plastic x 2	Internal Waste Transfer building	4.5	10	11	495m ³	4-12 weeks
Shed 12 Plastic bottles packaging	Internal					4-12 weeks
Shed 13 Plastic bottles packagin	Waste Transfer building					4-12 weeks
Shed 14 Plastic bottles packaging	Internal					4-12 weeks
Shed 15 Plastic/ card	Waste Transfer building	4.5	30	20		4-12 weeks
Anderson Shelter A	Fixed shelter building	4.5	12.2	12.2		4-12 weeks
Anderson Shelter B	Fixed shelter building	4.5	12.2	12.2		4-12 weeks
Anderson Shelter Barrel wash area	Fixed shelter building	4.5	12.2	12.2		4-12 weeks
External – Waste Transfer Building Canopies						
May contain plastic, paper, cardboard, food waste	External under canopies	3	5	16	240m ³	4-12 weeks (24 hours wet food waste)
External – Containers						
Maximum 4 x 40-yard containers May contain either wood, DMR, general or scrap metal.	External	1.07	1.52	2.29	3.72m ³	Max 1 month
External – Stockpile						
Scrap Metal	External	5	10	10	500m ³	4-12 weeks

Storing waste materials in their largest form

Wastes are stored in their largest form in designated stockpiles. No treatment to wastes other than manual or mechanical segregation and baling is undertaken.

10 Where Maximum Pile Sizes Do Not Apply

The below are where within FPP guidance maximum pile sizes do not apply for these types of waste.

Whole end of life vehicles (ELVs)

The site is not permitted to or will accept end of life vehicles.

Containers

FPP guidance states that sites storing waste in containers that can hold more than 1,100 litres, must be accessible so any fire inside it can be put out. In the event of a fire, these containers must be moved as soon as is reasonably practicable to prevent the fire spreading.

Drawing 003 shows where waste/material will be located for the storage of permitted waste both inside the waste transfer buildings and externally. This demonstrates the accessibility of all waste containers.

Waste Transfer Buildings

Shed 1

Within shed 1 plastic and cardboard/paper is baled using the Scapa HB4 Semi Auto Baler, and bales are then stacked to make stockpiles with a 6m separation between the waste types.

Plastic stockpile measuring maximum $11.5\text{m} \times 11.5\text{m} \times 4.5\text{m} = 595\text{m}^3$

Cardboard/Paper Stockpile maximum $11.5\text{m} \times 11.5\text{m} \times 4.5\text{m} = 595\text{m}^3$

Shed 2

Within shed 2 plastic and cardboard/paper is baled using the Jovisa Fully auto baler & Conveyor and Bollegraff HBC140 Fully auto baler & Conveyor, and bales are then stacked to make stockpiles with a 6m separation between the waste types.

Plastic stockpile measuring maximum $8\text{m} \times 11\text{m} \times 4.5\text{m} = 396\text{m}^3$

Cardboard/Paper Stockpile maximum $8\text{m} \times 11\text{m} \times 4.5\text{m} = 396\text{m}^3$

Shed 3

Within shed 3 food waste will be stored on pallets awaiting processing with a 6m separation between the stockpiles.

2 x Food waste stockpile measuring maximum $21\text{m} \times 4\text{m} \times 4.5\text{m} = 396\text{m}^3$

Shed 4

Within shed 4 food waste will be stored and processed using the Vertical baler and Fyson Elevator

Food waste stockpile measuring maximum $21\text{m} \times 4\text{m} \times 4.5\text{m} = 396\text{m}^3$

Shed 5

Shed 5 is used as a loading shed, no waste will be stored within this area.

Shed 6

Within shed 6 plastic waste will be stored.

Plastic stockpile measuring maximum $8\text{m} \times 11\text{m} \times 4.5\text{m} = 396\text{m}^3$

Shed 7

Within shed 6 plastic waste will be stored.

Plastic stockpile measuring maximum $8\text{m} \times 11\text{m} \times 4.5\text{m} = 396\text{m}^3$

Shed 8

This area is not operated by T3E. No waste will be stored within this area. This is used for the returns of ebay sales.

Shed 9

Within shed 9 is where products are bulked and stored. WEEE awaiting inspection to determine whether they are required for repair, reuse or to be recycled.

Shed 9 will also be used for overflow storage for dried food products in case of no capacity available in shed 3 and 4.

WEEE stockpile measuring maximum $11.5\text{m} \times 11.5\text{m} \times 4.5\text{m} = 595\text{m}^3$

Overflow stockpile measuring maximum $10\text{m} \times 8\text{m} \times 4.5\text{m} = 360\text{m}^3$

Shed 10

Within shed 10 baled plastics will be stored with 6m separation between the stockpiles.

4 x baled plastic maximum stockpiles $4\text{m} \times 17\text{m} \times 4.5\text{m} = 306\text{m}^3$

Shed 11

Within shed 11 baled plastics will be stored with 6m separation between the stockpiles.

2 x baled plastic maximum stockpile $11\text{m} \times 10\text{m} \times 4.5\text{m} = 495\text{m}^3$

Please note that waste streams may vary due to business demands. Waste pile sizes will be adhered to with 6m fire breaks therefore not increasing the risk.

These wastes are stored at their largest form either bulked or baled.

Shed 12

Pallatised plastic bottles or dry packaged materials on racking three bays high

External Storage Canopies

The areas marked on Drawing 003 allows for the storage of plastic and cardboard bales and barrels of food which are awaiting bulking by being transferred into a wagon from site. The wastes are classed as one stockpile as requested by the EA, with a maximum stockpile at any one time of 240m³.

A bulk tipper is located underneath the canopy as shown in drawing 003, this is used for wood waste. A regular inspection is carried out during daily checks, once the container nears capacity it will be transported to a permitted facility for further recycling.

These wastes are stored at their largest form either bulked or baled.

External Storage

Externally there is a scrap metal pile which measures 10m x 10m x 5m= 500m³ as shown in drawing 003.

These wastes are stored at their largest form either bulked or baled.

Moving containers in a fire

Access to all stockpiles/containers storing wastes on-site will be maintained at all times to allow for the extinguishing of any fire within a stockpile/container or for its removal to the quarantine area (fire prevention) as soon as is reasonably practicable.

Each stockpile/container is accessible with operatives able to inspect.

In the event of a fire the use of onsite water suppression or fire extinguisher can be directed into any /stockpile container or pulled away using site plant to isolate it into the appropriate quarantine area. This should take 5 minutes.

Compost production

No composting activities take place on site.

POP' s

Any permit involving the treatment or transfer of WEEE or of materials and components derived from WEEE needs to take into account the likelihood that some of the waste is POPs waste.

WEEE wastes will be accepted.

Persistent organic pollutants (POPs) can be present in waste and can have significant effects on human health and the environment. They are subject to the POPs regulations 2019 – UK SI.2019 No.1099, implementing Regulation (EU) 2019/1021. These regulations specify the appropriate treatment for the recovery and disposal of POPs.

Storage of WEEE is shown on drawing 003.

If there is a fire, a nominated member of staff will inform the Fire and Rescue Service that there are wastes containing POPs on site. If there is a fire involving POPs waste then any residue from the fire may contain POPs and so will be segregated and treated following the POPs regulations, including possibly contaminated fire water.

11 Prevention of the Spread of Fire

Separation Distances

All stockpiles of potentially combustible wastes are stored 6m from potential sources of ignition (i.e. on-site treatment/processing operations, moving plant).

Fire Walls, Bays, Buildings and Stockpiles

The site, stores wastes both internally and externally as detailed in Section 10.

The waste transfer buildings are constructed from brick, block and asbestos fibre cement roofing.

The building is grouted and sealed to contain any fire water or spillages.

As previously stated, wastes are subject to constant inspection and frequent stock rotation, ensuring waste are processed on a first in, first out policy.

The fire resistance rating of the concrete walls and panels has been estimated using the 'Standard Method for Determining Fire Resistance of Concrete and Masonry Construction Assemblies' (American Concrete Institute, ACI Standard 216.1-97). Table 2.1 of the ACI Standard is reproduced (converted to SI units) as per Table 5 below.

Table 5
Fire resistance of singular layer concrete walls, floors and roofs

Concrete Aggregate Type	Minimum equivalent thickness for fire resistance rating (cm)				
	1-hour	1.5-hour	2-hour	3-hour	4-hour
Siliceous	8.9	10.9	12.7	15.7	17.8
Carbonate	8.1	10.2	11.7	14.5	16.8
Semi-lightweight	6.9	8.4	9.7	11.7	13.7
Lightweight	6.4	7.9	9.1	11.2	13.0

The specific type of concrete used is not known therefore, as a sensitivity text, consideration of the properties of all types has been given. As can be seen, for a fire resistance rating of 2 hours is achieved by a concrete wall of between 9-13cm. Table 5 infers that the 0.8m (80cm) thick bay walls are capable of resisting fire for more than 4 hours.

Management of wastes stored in bays and containers

The site, stores wastes both internally and externally as detailed in section 9 and 10.

12 Quarantine Area

Quarantine Area Location and size

The quarantine area is somewhere burning wastes can be moved to extinguish them. It can also be used for the storage of unburnt wastes into the quarantine area to isolate and prevent them catching fire if necessary.

Quarantine area (fire prevention) is located 6m from the site boundary to prevent the risk of heat/fire spreading across the site boundary.

Drawing 003 clearly defines the quarantine area, indicating the required minimum 6m separation buffer that will be maintained during a fire event.

The quarantine area (fire prevention) will during normal site operations will be kept clear.

The quarantine area is measured at 8(l) x 8.5(w) x 5(h) = 340m³. This area is located inside the waste transfer station measured and marked to ensure the area is kept clear at all times, in the event a fire occurs.

The quarantine area (fire prevention) is large enough to hold 50% of the largest stockpile stored internally or externally, which is 599m³.

How to use the quarantine area if there is a fire

The quarantine area is located within the permitted area.

Procedure to remove material stored temporarily if there is a fire

If safe to do so nominate trained staff can separate any burning waste from stockpiles into this area for active firefighting using the forklift or telehandler.

If safe to do so staff can also move fire damaged waste after a fire into these areas to quarantine it from viable waste.

Access to all on-site skips/containers storing wastes will be maintained at all times to allow for the extinguishing of any fire within a skip/container or for its removal to the quarantine area (fire prevention) as soon as is reasonably practicable.

Waste Quarantine Area

In the event any unpermitted or contaminated waste requires quarantine this will be stored in a designated marked skip.

This is shown on Drawing 003.

13 Detecting Fires

Detection systems in use

Identifying fires as quickly as possible makes the suppression of the fire easier and results in lesser damage to the environment and human health.

The below detection systems are in place on site.

CCTV

Onsite CCTV cameras provide visual monitoring during operational hours and out of hours.

Site also benefit for 24-hour security who are based at the gate house.

Please see annex 3 for camera specification and drawing 003 for camera locations.

Senior management have remote access to CCTV cameras for active all round the clock monitoring.

Fire Alarms

Fire alarms will be activated to raise the alarm in the event of a fire.

Waste Transfer Building

Within the transfer building there are CCTV cameras for visual fire and smoke detection.

Annex 5 Service Report & Certificate of Inspection details the locations of the 93 extinguishers located around site.

Fire Alarm Tests and Drills

Tests and drills are an important mechanism to ensure that the site is prepared for a fire. As such:

- Fire drills take place six monthly to identify any weakness in the evacuation strategy on site; and
- Fire alarms are to be tested regularly in accordance with the manufacturer's recommendation.

14 Suppressing Fires

EA guidance states “If you store waste in a building, you must install a fire suppression system. This system should be proportionate to the nature and scale of waste management activities you carry out and the associated risks”.

Due to the level of combustible waste stored on site, combined with low storage times and the fact that waste is segregated, the risk of fire occurring is low. Taking into account end of shift checks and robust security monitoring 24/7 it is not proportionate to fit any of the above automated systems.

The site as the below equipment to suppress small fires or smouldering wastes on site:

Handheld Fire Extinguishers

Handheld firefighting equipment is provided in the buildings and will also be provided within mobile plant.

A 9kg or 6kg powder extinguisher is placed in each building and external storage areas.

All mobile plant is fitted with 2kg dry powder fire extinguishers for fighting vehicle/equipment fires.

Mains Water Supply

The site is equipped with a mains water supply and a mains water connection is provided as shown on drawing 003.

The site is equipped with a standard 32mm mains water pipe supplying the site with mains water. A dedicated firefighting hose (50m) will be provided and maintained, allowing for water to be available and within reach of all waste storage locations in the event of a fire.

15 Firefighting techniques

The site must always have the resources available to fight a fire. These include:

- Plant to move waste around the site such as the hook loader and forklift;
- Nominated staff (on-call for out of hours events);
- Available water supply;
- Fire Extinguishers; and
- Finances for the removal of fire damaged waste or water and any remediation costs.

In the event of a fire at the site, the class of fire will determine the action to be taken by the fire authorities.

Site information

To assist the authorities in managing a fire outbreak at the site, a copy of this FPP should be provided to the authorities as possible including the site layout plan and quantities and types of stored materials.

A copy of this document will be located outside of the office for the Emergency Services and site staff to access in an emergency.

Emergency Service Response

The local Fire and Rescue Service will assume full control for the approach to suppression/extinguishing of any fire once it is in attendance at the site.

The nearest fire station is located 2.3 miles from the site (Irthlingborough Road, Wellingborough, NN8 1LQ). The approximate response time is 8 minutes.

Onsite firefighting equipment

Fire extinguishers are situated around the site in key locations, they are also located inside the waste transfer building for easy access, and next to the fuel storage areas.

All mobile plant is fitted with 2kg dry powder fire extinguishers for fighting vehicle/equipment fires.

Site plant is stored externally when not in use. This allows for safe access of equipment in the event of a fire (areas shown in Drawing 003).

All firefighting equipment will be kept in good condition, unobstructed, and be serviced at least once a year by a competent person.

Fire hoses are available to apply water to any stockpiles near to the main building, to cool smouldering wastes or cool.

In addition, as discussed in Section 12 the quarantine area (fire prevention) will also be maintained and kept free of obstruction, to be used as either:

- An area for extinguishing burning materials;
- An area for the segregating of unburnt materials away from a fire

Water Supplies

On Site Supply

Mains supply is available on site as shown on drawing 003, with additional hoses located within sheds.

External Supply

The EA guidance for FPP requires that, for a 300m³ stockpile, a total of 360,000 litres (360m³) of water would be required in order to extinguish the fire.

Two active fire hydrants are available outside of the permitted area. The presence of the hydrants were confirmed by Northamptonshire FRS on 6th June 2023.

Image 3 – Location of Hydrants to site

Water supply required

Table 6 below details the largest stockpile on site and water supply required for a minimum of 3 hours.

Table 6 – Required water supplies

Maximum pile volume in cubic metres	Water supply needed in litres per minute x 6.67	Overall water supply needed over 3 hours in Litres x 180	Total water available on site in litres
599m ³	3,995lts	719,159lts	720,000lts (2 x hydrant supply)

British Standards for fire hydrants are such that the flow rate of any hydrant must be capable of delivering at least 2000 litres (2m³) per minute at 1.7bar.

The typical working pressure of fire hydrants is between 55m and 62m (head, equivalent to 5.4bar to 6.1bar). At 30litres/second (1.8m³/minute), the operating pressure of the main would be 30m (head, 2.9bar).

The active hydrants would provide 720,000ltrs water supply which is sufficient currently to supply enough water for active firefighting of the largest stockpile of 599m³.

Managing Fire Water

All areas of the site benefit from concrete surfacing providing an impermeable surface and two interceptors with shut off valves. See annex 6 for specification.

Dammit mats will be used to cover drains within the permitted area and interceptors will be shut off and sandbags are used to contain water within the waste transfer buildings with entrances/egress that cannot be secured, mats and sandbags are situated outside the waste transfer buildings as shown on drawing 003. The bund of sandbags and mats will take approximately 10 minutes for each entrance/egress to implement by one member of staff.

The waste transfer buildings are able to withhold approximately 1,334,000 litres of fire water.

$40 \times 128 \times 0.12 = 614,000$ litres

$40 \times 150 \times 0.12 = 720,000$ litres

ENVA can provide an emergency response in the event contaminated water is to be removed off site to a suitably permitted facility.

During and after an incident

The site has an Emergency Action Plan in place (See Annex 2).

On the discovery or suspicion of a fire:

- Activate the nearest fire alarm;
- Initiate evacuation of staff and visitors on site to the muster point and instruct delegated person(s) to conduct a rollcall to ensure all site users are accounted for;
- If trained and safe to do so, attempt to tackle the fire using one of the site's fire extinguishers or segregate smouldering/burning waste;
- Where attendance of the local Fire and Rescue Service is required, dial 999 to call the Fire Brigade;
- Staff will deploy sandbags and dammit mats to prevent the release of any potential fire water;
- The Operator (or other responsible person) will make an assessment of the prevailing wind direction, contacting the critical receptors shown on Drawing 004 dependant on the receptors that may be affected;
- Operator contacts the EA on 0800 80 70 60.

Active fire fighting

If safe to do so staff may try to suppress a small fire using fire extinguishers or by using site plant to segregate and separate burning waste.

Fire extinguishers are located and maintained at the fire action points around the site and within the cabs of site plant/vehicles.

Instruction signs on the use of extinguishers and suitability of each type of extinguisher are kept adjacent to the extinguishers.

Visitors/Staff

On hearing the fire alarm:

- Leave the site quickly and calmly via the site's or office main entrance, closing all doors behind you;
- Report to the Operator/Fire Warden at the assembly point located outside of the main entrance;
- Do not take risks;
- Do not stop to collect personal belongings; and
- Do not re-enter the site for any reason unless authorised to do so.

Fire action notices are located and maintained at various points around the site to remind staff of the actions to be taken in the event of discovering a fire or hearing the fire alarm.

Receptors

Local receptors must be notified via telephone or verbally, if staff are able to attend local businesses or properties as described in Section 6.

Deliveries to site

Contact will be made with customers to stop incoming material for the next 24hrs or until site management have cleared the site as operational.

Making the site operational after a fire

After a fire event, the following procedure will be implemented depending on the severity of the fire.

After a small fire

A fire dealt with in-house using suitably trained staff and firefighting equipment located on site is classed as a small fire.

The fire will be recorded in the site diary and an Incident Record produced which will include the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented on-site will be incorporated within updates to this FPP, as required.

The incident and the results of the above assessment will be forwarded to the EA, with any updates to the FPP and the site's EMS made if required.

After a large fire

A fire that requires the presence of the Fire and Rescue Service is classed as a large fire.

If the site has been told to evacuate or cease operations by the EA and/or Fire and Rescue Service, site management and staff will wait until instructed that it is safe to re-enter the site and resume operations. The fire will be recorded in the site daily check sheet and an Incident Record Form with details of the cause of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented on-site will be incorporated within updates to the FPP and the site's EMS as required.

Should damage be sufficient to prevent permitted operations at the site, the site will cease accepting waste and will divert deliveries to a suitably licensed facility, in accordance with the contingency planning provisions.

The Operator will liaise with the EA to determine a plan-of-action to recommence permitted operations at the site, and the timescales involved to achieve this.

Contaminated Fire Water

ENVA (01505 321 000) provide support in an emergency. In the event contaminated water is to be removed offsite the company can provide an emergency response and remove any contaminated water to a suitably permitted disposal site.

Fire Damaged Waste

A visual assessment will be carried out by the Operator to determine whether the waste can continue to be stored on-site. Wherever possible, unburnt wastes will be separated from fire damaged piles. If waste piles have become mixed, then it is likely that the waste will be removed from the site for disposal.

Any fire damaged waste will be removed from the site within 24 - 48 hours to a suitably permitted facility.

Any quarantined waste, waiting for removal from site, is stored in the quarantine area to prevent the contamination of unburnt wastes on-site.

Conclusion

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

- a fire on site;
- the results of any testing of this FPP indicate that changes are required;
- a change or review of legislation; or
- if the site is instructed to do so by the EA.

It will be the responsibility of the Operator or nominated person to maintain this Fire Prevention Plan and to ensure it is adhered to both to limit the risk of a fire occurring on-site and in the event of a fire on-site.

Any updates to this FPP, either as a result of specific incidents or identified during its testing/review, will be submitted to the EA for its approval prior to implementation of the proposed changes at the site.