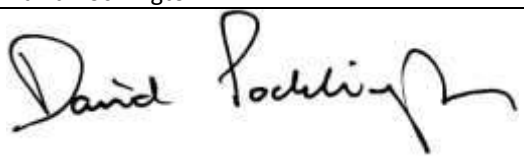
MONARCH METALS LTD

Fire Prevention Plan

Unit B
Westwood Ind. Estate
Arkwright Street
Oldham
Greater Manchester
OL9 9LZ

Fire Prevention Plan

Unit B
Westwood Ind. Estate
Arkwright Street
Oldham
Greater Manchester
OL9 9LZ

Project Reference : 129-003279	Date: July 2024
Project Manager (Mayer Environmental Ltd)	Authorised (Mayer Environmental Ltd)
Callum Sutcliffe	David Pocklington
	

Prepared by:
Mayer Environmental Ltd
Transport Avenue
Brentford
Middlesex
TW8 9HA
Tel: 020 8847 3637
Fax: 020 8847 3638
www.mayer-enviro.com

CONTENTS

APPENDICES

Appendix 1: Sensitive receptors site plan
Appendix 2: Human and environmental receptor list
Appendix 3: Human and environmental receptor tables
Appendix 4: Site operations plan
Appendix 5: Site drainage plan
Appendix 6: Fire & Rescue Service hydrant locations plan
Appendix 7: Metal grades
Appendix 8: Vehicle daily check sheet
Appendix 9: Site inspection sheet
Appendix 10: Hot works procedure
Appendix 11: Mobile plant specifications

1.0 INTRODUCTION

1.1 Site Location and Setting

Monarch Metals Ltd (MML) has a predominantly urban setting, forming a trapezoid shaped parcel of land accessible via Arkwright Street, Unit B, Westwood Industrial Estate, Oldham, OL9 9LZ. The site covers an area of approximately 0.23 acres and the national survey grid reference is SD 91354 05123.

Its predominantly urban setting means that MML has a number of potential sensitive human receptors including residential properties as well as commercial and industrial businesses. Despite its urban setting, MML has a number of potential sensitive environmental receptors. Within 1km of the site, there are no Sites of Special Scientific Interest (SSSIs)/Special Area of Conservation (SAC). However, within 10km of the site, there are 5 SSSIs and 1 SAC as well as semi-improved grassland, lowland dry-acid grassland, upland hay meadow, upland and lowland heathland, blanket bog, upland flushes, fens and swamps, replanted ancient woodland and fragmented heath.

The key sensitive receptors, within a 1km radius of the site, are shown on the sensitive receptors plan, included as Appendix 1, and the full list of human and environmental receptors is provided as Appendix 2, with further discussion provided as a table in Appendix 3.

The site is located within a 'Special Protection Zone II Outer Protection Zone' and has a very low risk of flooding. The site is located on a Secondary A Aquifer and underlain by Pennine Lower Coal Measures comprising of mudstone, siltstone and sandstone. There are recorded Devensian till superficial deposits comprising of clay.

The prevailing wind direction for the region is south-westerly.

1.2 Operational Overview

MML operates a metal recycling facility and accepts a range of ferrous and non-ferrous metals, batteries and cables. MML does not accept any ELVs on site or complete ELV depollution operations on site.

As such, some of the accepted waste stream grades can be considered non-combustible. The site operates one shift, spanning from 08:00 – 16:30 on Mondays to Fridays and 08:00 – 11:30 on Saturdays. To confirm, the site is not operational on Sundays and Bank Holidays.

The site is provided with impermeable concrete paving within a sealed drainage system – on which all storage and treatment activities are carried out. The gradient of the impermeable concrete within the warehouse building falls towards the centre of the site. The only gully on

site is outside the warehouse building where the impermeable concrete paving also falls towards this gully and then to foul sewer.

All activities completed on site are summarised in the table below. All treatment processes listed below facilitate size reduction or densification to enable efficient onward transport, and to generate the metal grades required for furnaces.

Recovery/Disposal Code & Description	Limits of Activities
• R4 - Recycling/reclamation of metals and metal compounds. • 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)	• Treatment consisting only of sorting, separation, grading, shearing, baling, compacting, granulating of cables, and cutting using hand-held equipment only, of ferrous metals or alloys and non-ferrous metals into different components for recovery • There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. • No more than 5 battery boxes (total 5m³) of waste lead-acid vehicle batteries (waste code 16 06 01*) shall be stored at the site at any one time. • Wastes shall be stored for no longer than 3 years prior to recovery. • The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time. • There shall be no treatment of catalytic converters, including decanning, other than manual sorting and separating the catalytic converters from other wastes. • No more than 10 tonnes of intact waste vehicle catalytic converters (waste code 16 01 21* or 16 01 22) shall be stored at the site at any one time.

MML's business model is dependent on high quality incoming materials (controlled by strict Waste Acceptance Procedures), the "first-in, first out" principle, and minimising storage (less than 3 months) of all metal grades. With regards fire prevention, MML's business model reduces storage time and eliminates the potential for self-heating.

Incoming waste vehicles are inspected at the weighbridge and unloaded into a designated unloading area. During unloading, the waste is subject to further inspection as it is segregated by grade into bins or stockpiles in preparation for further treatment on site or dispatch to an alternative, suitably licenced facility. The main infrastructure of the site includes: Warehouse building including welfare facilities, battery storage area, scales and mobile plant.

1.3 Purpose of the Fire Prevention Plan

A FPP has 3 overarching objectives which define its overall purpose:

1) Minimise the likelihood of a fire happening
2) Aim for a fire to be extinguished within 4 hours
3) Minimise the spread of fire within the site and to neighbouring sites

This FPP outlines how MML's site infrastructure as well as operational practices and procedures allow for the aforementioned objectives to be met.

1.4 FPP Scope

EA FPP Guidance (Fire Prevention Plans: Environmental Permits, updated 11th January 2021) applies to Operators that *"accept any amount of combustible waste"* and those *"storing combustible waste that takes place as part of a storage and treatment process".* As such MML requires a FPP and is subject to the aforementioned guidance. This FPP will review the FPP Guidance requirements in Sections 4 – 18 and demonstrate how MML complies with such requirements for combustible wastes.

Mayer Environmental Ltd (MEL) has been commissioned by MML to assist with the compilation of the FPP. The information and procedures provided in this document are based on minimising potential impacts to the environment in line with current FPP guidance, and are not intended to fulfil any legal requirements with respect to health and safety. Separate health and safety risk assessments and Safe Working Procedures (SWPs), including for example a fire risk assessment, should be completed by health and safety specialists and these health and safety documents and the health and safety of operatives should take precedent.

2.0 USING THE FIRE PREVENTION PLAN

2.1 FPP Wider Context

This FPP is a working draft document compiled in accordance with FPP Guidance and will be considered a formal document upon approval by the Environment Agency (EA). The FPP will form part of the EMS and be available to review in the weighbridge site office. Given its context within the EMS, the FPP will not repeat information provided in other documents within the EMS such as the Working Plan. Where necessary, this FPP will reference the specific EMS document accordingly.

2.2 Operative Training

All MML Site Management and operatives complete a fire safety component during their induction, which includes FPP contents overview, evacuation procedures, fire assembly point, fire extinguisher use and the overall 'Site Fires Procedure' from the Accident Management Plan. Ensuring that all Site Management and operatives are trained in the aforementioned issues allows for sufficient personnel resource in the event of a fire. All Site Management and operatives are trained in the use of fire extinguishers and the site has 4 designated Fire Wardens. Refresher courses for this training are provided by MML when required.

The Regulatory Reform (Fire Safety) Order 2005 requires organisations to complete fire drills which are "repeated periodically where appropriate". All Site Management and operatives participate in an evacuating fire drill which is completed every 6 months (equating to two drills completed per calendar year) in accordance with BS EN9999:2017. The drills will test various scenarios outlined in the FPP and those discussed in previous training. Roll calls are completed to ensure that all Site Management and operatives complete a minimum of 2 fire drills per annum. The results of fire drills will be reviewed by Site Management and any required revisions to the FPP will be made. The revised FPP will be submitted to the EA for approval.

Both the aforementioned legislation and British Standard require a review of fire drill operations following completion which demonstrates that all participants understand the procedure by recording the speed of full evacuation, any noticeable events and improvement areas for future drills. Having such a review will demonstrate that all Site Management and operatives are practiced in completing fire drills and implementing FPP procedures.

All Site Management and operatives training records are stored on site and MML organises refresher training when required.

2.3 Contractors and Visitors

Contractors and visitors are given a site induction upon first visit which includes emergency procedures in the event of a fire. Aside from this, contractors are also informed about the FPP and their role in preventing fires on site. As such, any contractors coming to complete work on site, including Hot Works, must provide safe working procedures, risk assessments and proof of competency before MML allows the work to commence.

2.4 FPP Review

The FPP will be reviewed every 4 years (as a minimum) alongside other documents within the EMS. However, the FPP will be reviewed and updated accordingly as soon as practically possible in the event of the following:

- Significant changes in site operations (e.g. mobile plant and equipment used, processing techniques, throughput variation, waste stream changes)
- A fire incident occurs on site
- Feedback from Site Management, Operatives or third-parties that any aspect of the FPP does not work in practice or could be improved
- Results of drill or scenario testing (should be logged as per the Working Plan and Accident Management Plan) mean the FPP requires changing
- Revisions to FPP Guidance

Regardless of circumstance for the review, the revised FPP will be submitted to the EA for approval.

3.0 TYPES OF COMBUSTIBLE WASTE

3.1 Types of Combustible Waste

In accordance with the EA FPP Guidance, the combustible wastes stored on the MML site are:

- Lead acid batteries
- Cables
- No. 1 steel
- Light iron

Despite being beyond FPP scope, combustible non-waste materials have been considered in this FPP regarding potential ignition sources and minimising potential fire spread. Considered combustible non-wastes include: diesel for plant, general waste and potentially, any quarantined unauthorised waste.

Appendix 7 summarises information relating to all wastes stored on site.

4.0 ACTIVITIES AT SITE

4.1 Activities Completed at Site

Inspection and acceptance of waste from Suppliers

- New Suppliers are subject to due diligence checks by MML prior to accepting waste onto site as detailed in the Pre-Acceptance Procedure and Waste Acceptance Procedure in the Working Plan. This allows MML to have control over which waste streams are accepted onto site and minimises risk of receiving unauthorised waste.
- Wastes are inspected before and during unloading against the Waste Acceptance Procedure in the Working Plan and compliance requirements.

Rejection of unauthorised wastes which increase fire risk (e.g. canisters) in accordance with Working Plan and Accident Management Plan procedure

- MML reject unauthorised wastes, including those which increase the risk of fire (e.g. canisters). Rejected wastes are either returned to the customer or temporarily quarantined as detailed in section 9.0 and dispatched from site as soon as practically possible to a suitably licenced facility.
- Rejected wastes are recorded by MML and reported to the EA as required in accordance with the procedure outlined in the Working Plan.

Segregated storage of waste by grade prior- and post-physical treatment

- All pre- and post-treatment storage is completed as summarised within Section 1.2 of this FPP.
- Wastes stored in accordance with Recovery Code R13 as outlined in the Waste Framework Directive.
- Different grades are stored in designated bins or skips.
- All wastes are stored on impermeable concrete paving within the sealed drainage system.

Physical treatment of waste

- All physical treatment of waste is completed in accordance with the Recovery Code R4 as described in the Waste Framework Directive.
- Such treatment operations include: sorting, separation, grading, shearing, baling, compacting, granulating of cables, and cutting using hand-held equipment only.

- Waste inspection, receipt and acceptance procedures outlined in the Working Plan ensures only authorised wastes are treated.
- All treatment operations are completed on impermeable concrete paving within the sealed drainage system.

Use and storage of mobile plant and operational equipment

- Mobile plant and equipment is used to sort, segregate, grade and treat metal upon receipt on site.
- When not in use, mobile plant is stored in designated areas identified on the site operations plan provided as Appendix 4.
- Pre-use checks are also completed on mobile plant in the aforementioned designated storage areas using the vehicle daily check sheet provided as Appendix 8.
- Use and storage of all plant is completed on impermeable concrete paving within the sealed drainage system.

Maintenance and servicing of mobile plant and operational equipment

- Maintenance and servicing of plant is completed on impermeable concrete paving within the sealed drainage system.
- Plant is maintained and serviced in the designated storage areas identified on the site operations plan provided as Appendix 4.
- Required or ongoing maintenance of mobile plant and operational equipment is recorded using the vehicle daily check sheet and on the site inspection sheet provided as Appendices 8 and 9 respectively.
- Plant and operational equipment are serviced as per manufacturer guidelines.
- MML fleet vehicles are serviced and subject to MOT testing on an annual basis.
- Servicing of mobile plant and equipment is completed by a competent contractor – evidence of service and contractor competence is retained by MML.

Storage of non-wastes liquids as per the Working Plan

- All non-waste liquids are stored on impermeable concrete paving within the sealed drainage system.
- The diesel tank is double-skinned and labelled with contents/capacity.
- All other non-waste liquids are stored in drums or manufacturer-supplied receptacles with appropriate secondary containment.
- The quantity of non-waste liquid on site is limited by tank and receptacle capacity.
- Operatives are trained in the use of non-waste liquids and the ‘Site Spillage Procedure’ in the Accident Management Plan.

Preparation and dispatch of hazardous and non-hazardous waste for further processing, recovery or disposal to minimise duration of site storage

- MML operates a "first in, first out" policy to maximise throughput – this minimises storage of material and waste on site.
- No waste is stored on site for longer than 3 months.
- All dispatched hazardous and non-hazardous waste is accompanied with the required waste paperwork.
- MML is an Upper Tier Waste Carrier which allows for internal fleet to transport waste when required.

Inspecting and deploying (where necessary) suppression and mitigation strategies for emissions generated on site, such as dust, particulates, debris, mud, odour, fumes, litter, noise, vibration

- Scope of emissions is monitored daily in accordance with the Site Inspection Sheet.
- Suppression and mitigation strategies deployed are detailed in the relevant sections of the Working Plan.

Maintenance and servicing of other equipment on site (e.g. fire extinguishers, air conditioning)

- Maintenance and servicing as per manufacturer guidelines.
- Maintenance and servicing completed by competent operatives and/or contractors.
- Maintenance and servicing records and competency records are retained on site.

Welfare breaks and use of welfare facilities

- Welfare breaks are taken in the welfare building.
- The site is a designated no smoking area.

4.2 Site Plans

Included within the FPP are the following site plans:

Sensitive Receptors within 1km Plan – Appendix 1

The key human and environmental receptors noted in the Environmental Risk Assessment have been plotted onto the map provided as Appendix 1. Where appropriate, receptors have been grouped (e.g. residential properties, business within an industrial park) to provide clarity on the plan. A full list of receptors is provided in Appendix 2, with further discussion of the potential impact on the receptors provided in Appendix 3.

Site Operations Plan – Appendix 4

The plan displays key infrastructure involved with waste operations on site, including the locations of fire extinguishers. The plan details scaled footprints of all waste storage areas on site, with the maximum storage dimensions of combustible wastes, marked in metres.

The plan also displays the locations for mobile plant storage when not in use or being subject to maintenance or servicing, all which are more than 6m from combustible wastes. This removes a common cause of fire identified in Section 7.2 in the FPP Guidance.

Water Supplies and Drainage Plan – Appendix 5

The plan displays the details of the drainage system, including gullies and drainage runs.

Fire and Rescue Services - Hydrant Locations Plan – Appendix 6

The plan identifies the location of the off-site hydrants within approximately 250m of the site.

5.0 MANAGING COMMON CAUSES OF FIRE

5.1 Managing Common Causes of Fire

Using FPP Guidance Section 7 as a framework, below is summary table detailing potential ignition sources on site and the actions employed by MML to mitigate fire risk.

It should be noted that not all common causes of fire are applicable to MML. When not applicable, this will be noted with justification for its non-applicability.

Common Cause of Fire	Fire Risk Mitigation Measures
Arson	• 24/7 CCTV in operation which is monitored by Site Management during operational and non-operational hours. The CCTV is also monitored by a specialist, third-party contractor (Aspire Monitoring) during non-operational hours. Contact details for Aspire Monitoring, Site Management and on-call mobile plant operatives are reviewed periodically • Perimeter metal fencing on the western boundary of the site. The integrity of the perimeter fencing is completed in accordance with the Working Plan • Lockable front gates which are locked during non-operational hours • The Warehouse Building including the welfare facilities, battery storage area and designated non-waste liquid storage cupboard, is locked during non-operational hours • Good housekeeping in accordance with the Working Plan minimises dust, debris, litter, other emissions around site, and ensures that items not in use are put away • All fire extinguishers (Appendix 4) are serviced annually in accordance with manufacturer guidelines • Site Management and operatives trained in the 'Site Fire Procedure' in the Accident Management Plan • The site has 4 Fire Wardens • Site Emergency Details and EA Incident Hotline Number are detailed in the Accident Management Plan • All Site Management and operatives are trained in the visual and olfactory signs of fire • Site Management complete site checks at the start and end of operational hours which includes identifying visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use at the end of operational hours

Plant and Equipment	• Mobile plant is stored in designated areas (more than 6m from combustible wastes and non-wastes) identified in Appendix 4 when not in use (including when being maintained or serviced) • Only trained operatives use mobile plant and equipment. Training records demonstrating this competence are retained by MML in the site office • Forklift trucks are serviced annually in accordance with manufacturer guidelines • MML fleet vehicles are serviced and subject to MOT testing on an annual basis • All scheduled maintenance and service is completed by competent operatives or contractors (for record keeping, evidence of competence is retained by MML) • Documented pre-use checks completed for mobile plant and vehicles each time prior to use • Mobile plant and equipment are switched off when not in use • Mobile plant and equipment are used and stored on impermeable concrete paving within a sealed drainage system • Plant and equipment are regularly checked for evidence of heating (including overheating), dust, debris or grease accumulation. When cleaning or maintenance is required, the plant or equipment is switched off and allowed to cool before cleaning or maintenance. • Any identified defects on plant or equipment is reported to the Site Management as soon as possible (and followed up if required). If deemed unsafe and increased risk of fire, the mobile plant or equipment is isolated and is not used • The site has 4 Fire Wardens • The site has multiple fire extinguishers on site (Appendix 4) which are serviced annually as per manufacturer guidelines. • All operational equipment has an emergency stop function for use in the event of a fire • Operatives are responsible for completing Fire Watches on the mobile plant and equipment they are using. These Fire Watches are completed on at the start of operational hours, breaks (including lunchtime), and at the end of operational hours to prevent the accumulation of ignition sources (such as dust, debris, oil, grease) on hot exhausts. • All mobile plant are fitted with dust filters • Site Management complete site checks at the start and end of operational hours which includes identifying visual and/or olfactory signs of fire, mobile plant parking location, as well as ensuring mobile plant and machinery are cool following use at the end of operational hours • Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan

	• Site Management and operatives are trained in both 'Liquid Spillage Procedure: Oil or Fuel on Impermeable Concrete Paving' and 'Liquid Spillage Procedure: Battery Acid' in the Accident Management Plan • Mobile plant place wastes, as opposed to dragging and dropping, to minimise the generation of sparks • All Site Management and operatives are trained in the visual and olfactory signs of fire
Electrical Faults Including Damaged or Exposed Electrical Cables	• Electrics are installed and maintained by a qualified electrician (maintenance records and evidence of competence are retained by MML) • Electrical faults are part of the pre-use checks completed on plant prior to use (on-board computer diagnostics) • PAT testing is completed annually in accordance with risk assessment (completion records and evidence of competence is retained by MML) • Electrical equipment with expired PAT test certificate is not used • Fixed Wiring Testing is completed every 5 years (completion records and evidence of competence is retained by MML) • Any electrical faults/defects are reported to the Site Management as soon as possible. If deemed unsafe and increased risk of fire, the electrical equipment is isolated and is not used • Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • Good housekeeping in accordance with the Working Plan minimises dust, debris, litter, other emissions and ensures that items not in use are put away • All fire extinguishers (Appendix 4) are serviced annually as per manufacturer guidelines. • All Site Management and operatives are trained in the visual and olfactory signs of fire
Discarded Smoking Materials	• The site is a designated no smoking area which is confirmed as part of the contractor and visitor induction • The site has 4 Fire Wardens • Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • All fire extinguishers (Appendix 4) are serviced annually as per manufacturer guidelines. • All Site Management and operatives are trained in the visual and olfactory signs of fire
Hot Works	• 'Fire Watch and Hot Work Procedures' (Appendix 10) • Hot Works only completed in designated areas which are more than 6m from combustible wastes and non-wastes. If required and possible, combustible wastes and non-wastes moved during Hot Works are

	returned when deemed safe • Hot working is completed in accordance with MML's relevant risk assessments • Good housekeeping on site minimises dust, debris, litter, other emissions and ensures that items not in use are put away as per the Working Plan • Internal Hot Works are completed in accordance with MML's Risk Assessment and Safe System of Work • Contractor Hot Works are completed in accordance with task-specific Risk Assessment and Safe System of Work – work does not commence until all required documentation is provided. • Only competent operatives are authorised to undertake Hot Works (evidence of competence is retained by MML) – work does not commence until evidence of contractor competency is provided. • Hot Works are managed with a Hot Works Permit which can only be signed off by Site Management • Fire extinguishers are located adjacent to Hot Works areas. Extinguishers are serviced annually as per manufacturer guidelines • The site has 4 Fire Wardens • All Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • Wastes subjected to Hot Works and associated equipment are fully cool before being stored • No Hot Works are started within an hour of operational hours ceasing • All Site Management and operatives are trained in the visual and olfactory signs of fire • Site Management complete site checks at the end of operational hours which includes identifying visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use at the end of operational hours
Industrial Heaters	• N/A – there are no industrial heaters on site
Hot Exhausts	• Plant is stored in designated areas (more than 6m from combustible wastes and non-wastes) when not in use (Appendix 4) • Mobile plant and equipment is only used by competent MML operatives. Training records demonstrating this competence are retained by MML in the site office • Documented pre-use checks, including dust, debris, oil and grease accumulation, completed for plant each time prior to use • The site has 4 Fire Wardens • All mobile plant are fitted with dust filters. • MML Site Management and Operatives complete Fire Watches throughout the day in accordance with the 'Fire Watch and Hot Work

	Procedures' (Appendix 10) • Operatives are responsible for completing Fire Watches on the mobile plant and equipment they are using. These Fire Watches are completed on at the start of operational hours, breaks (including lunchtime), and at the end of operational hours to prevent the accumulation of ignition sources (such as dust, debris, oil, grease) on hot exhausts. • Good housekeeping in accordance with the Working Plan – minimise/remove dust, debris, litter and other emissions from around site and when completing Fire Watches. Also ensures that items not in use are put away • All Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • All Site Management and operatives are trained in the visual and olfactory signs of fire • Site Management complete site checks at end of operational hours which includes checks on waste stockpiles for visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use
Ignition Sources	• Hot Works only completed in designated areas which are more than 6m from combustible wastes and non-wastes. If required and possible, combustible wastes and non-wastes moved during Hot Works are returned when deemed safe • The whole site is on impermeable concrete paving with a sealed drainage system • Good housekeeping minimises dust, debris, litter, other emissions and ensures that items not in use are put away in accordance with the Working Plan • MML Site Management and Operatives complete Fire Watches throughout the day in accordance with the 'Fire Watch and Hot Work Procedures' (Appendix 10) • Only competent operatives are authorised to undertake Hot Works (evidence of competence is retained by MML) • Hot Works are managed with a Hot Works Permit which can only be signed off by Site Management • Fire extinguishers are located adjacent to Hot Works areas. Extinguishers are serviced annually as per manufacturer guidelines • The site has 4 Fire Wardens • Wastes subjected to Hot Works and associated equipment are fully cool before being stored • No Hot Works are started within an hour of operational hours ceasing • All Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • All Site Management and operatives are trained in the visual and

	olfactory signs of fire • Hot surfaces are not covered nor used for storage • Site Management complete site checks at end of operational hours which includes checks on waste stockpiles for visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use
Batteries	• Batteries from discrete loads or mobile plant maintenance are exclusively stored in the designated battery store in accordance with Table 2.3 in the Working Plan • The quantity of batteries stored on site will not exceed that outlined in Appendix 7. • All Site Management and operatives are trained in the visual and olfactory signs of fire • All Site Management and operatives are trained in the 'Liquid Spillage Procedure: Battery Acid' in the Accident Management Plan • Site Management complete site checks at end of operational hours which includes checks on waste stockpiles for visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use
Leaks and Spillages of Oils and Fuels	• Mobile plant stored in designated areas (more than 6m from combustible wastes and non-wastes) when not in use (Appendix 4) • Scheduled maintenance and service programme on mobile plant in accordance with manufacturer guidelines • All scheduled maintenance and service is competed by competent operatives or contractor (for record keeping, evidence of competence is retained by MML) • Documented pre-use checks include checking for oil and fuel leaks or spillages and are completed for plant each time prior to use • Strict Pre Acceptance and Waste Acceptance Procedures to ensure that unauthorised wastes (e.g. liquid wastes) are not accepted onto site • All above ground storage tanks are double-skinned, have labelled contents and are inspected weekly to ensure integrity as per the Working Plan • All above ground storage tanks are located on impermeable paving within the sealed drainage system • All operatives are trained in standard filling procedures to reduce the risk of leaks and spillages during filling • Good housekeeping in accordance with the Working Plan minimises dust, debris, litter, other emissions and ensures that items not in use are put away • All bulk liquids are provided with appropriate secondary containment • All Site Management and operatives are trained in the 'Liquid Spillages

	Procedure: Oil or Fuel on Impermeable Concrete Paving' in the Accident Management Plan • All Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • All Site Management and operatives are trained in the visual and olfactory signs of fire • Site Management complete site checks at end of operational hours which includes checks on waste stockpiles for visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use
Build-up of Loose Combustible Waste, Dust and Fluff	• 'Fire Watch and Hot Work Procedures' (Appendix 10) • Daily inspections to identify dust, particulate, mud, debris and litter are completed daily in accordance with the Working Plan • Operatives are responsible for completing Fire Watches on the mobile plant and equipment they are using. These Fire Watches are completed on at the start of operational hours, breaks (including lunchtime), and at the end of operational hours to prevent the accumulation of ignition sources (such as dust, debris, oil, grease) on hot exhausts. • Good housekeeping in accordance with the Working Plan minimises dust, debris, litter and other emissions • Items not in use are turned off and put away, where possible, as per the Working Plan • Business model means wastes are dispatched from MML as soon as practically possible ("first in, first out") • All Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • All Site Management and operatives are trained in the visual and olfactory signs of fire • Site Management complete site checks at end of operational hours which includes checks on waste stockpiles for visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use
Reactions Between Wastes	• Wastes segregated into designated bins, skips or bays by material and grade with no mixing of wastes • Combustible non-wastes are stored more than 6m from wastes regardless of combustibility, or are provided with fire resistant bay walls • New Suppliers are subject to due diligence checks by MML prior to accepting waste onto site as detailed in the Pre-Acceptance Procedure and Waste Acceptance Procedure in the Working Plan. This allows MML to have control over which waste streams are accepted onto site and minimises risk of receiving unauthorised waste. There is strict adherence to both aforementioned procedures • Wastes are inspected before and during unloading against the Waste

	Acceptance Procedure in the Working Plan and compliance requirements. There is strict adherence to the Waste Acceptance Procedure • All Site Management and operatives are trained in the 'Site Fire Procedure' in the Accident Management Plan • All Site Management and operatives are trained in the visual and olfactory signs of fire • Site Management complete site checks at end of operational hours which includes checks on waste stockpiles for visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use • Wastes accepted by MML are unlikely to self-combust
Deposited Hot Loads	• Where required one of the empty roll-on-off bins stored on the access road will be brought onto site and used as a temporary quarantine container for hot loads • Fire extinguishers are serviced annually as per manufacturer guidelines • All waste loads are inspected on arrival at the site. Any suspected Hot Loads are not deposited/unloaded. The waste is only unloaded into the designated bay when there are no signs of an elevated temperature. • All Site Management and operatives are trained in the visual and olfactory signs of fire • Site Management complete site checks at end of operational hours which includes checks on waste stockpiles for visual and/or olfactory signs of fire, mobile plant parking location as well as ensuring mobile plant and machinery are cool following use

6.0 PREVENTING SELF-COMBUSTION

6.1 Manage Storage Time

As noted in Section 1.2 of this FPP and in the wider EMS, MML has a business model based on the criteria detailed below which means that storage time is managed using the following:

- Acceptance of high quality waste grades from applying the Waste Acceptance Procedure
- "First-in, first out" business model employed by MML
- Dispatch waste materials from site as soon as possible

This means that no waste is stored on site for longer than 3 months, regardless of its combustibility, and no wastes exceed the maximum dimension sizes detailed in Appendix 4. This allows for MML to maximise throughput as well as comply with FPP Guidance.

The aforementioned storage management approaches listed above will also be employed in the unlikely event of operational equipment (e.g. baler, cropper or mobile plant) downtime to ensure that no waste is stored on site for longer than 3 months. Operational equipment downtime would potentially increase the storage time as it will reduce processing on site. In this event, root causal analysis will be completed as soon as possible to identify the works required to reinstate operational equipment and limit downtime. As such, it is unlikely that this downtime will result in wastes being stored for more than 3 months.

6.2 Monitor and Control Temperature

No waste is stored on site for longer than 3 months. As such, it is not subject to the extra measures detailed under Section 8 of the FPP Guidance. There is no significant seasonal variation within the incoming waste streams.

6.3 Managing Bale Storage

MML does not accept baled waste (for example RDF, cardboard, paper). As such, MML does not store wastes in bales and is not subject to the requirements under FPP Guidance Section 8.3.

7.0 MANAGING WASTE STOCKPILES

7.1 Maximum Stockpile Size

Appendix 7 outlines the maximum stockpile sizes for combustible and non-combustible wastes on stored in site. As can be seen from Appendix 4, the maximum permanent storage area size for combustible waste is 115.2m^3 (6m x 4.8m x 4m high) for cable (marked as 'Cable Storage Area' on Appendix 4). To confirm, no wastes, regardless of combustibility or pile size, are stored longer than 3 months which complies with FPP Guidance Section 8 and WISH 28 Guidance.

Waste stockpiles will be managed to ensure the maximum pile sizes in Appendix 7 are not exceeded. Such management includes those outlined in Section 6.1.

As detailed in the Working Plan, following inspection, the vehicle is directed to a designated area for unloading. Directing vehicles to a designated area allows MML staff to manage stockpile sizes. In the event where a stockpile size could exceed the proposed size in Appendix 7, MML would limit the quantity of the waste stream entering site, and if necessary, divert loads to their other site at Uncouth Road, Rochdale, OL16 3DD.

7.2 Stockpile Locations

Appendix 4 demonstrates the location of various wastes at the permitted site and the minimum of 6m clearances between combustible wastes and ignition sources.

8.0 PREVENTING FIRE SPREAD

8.1 Separation Distances

Appendix 4 demonstrates that combustible wastes are stored in bins or skips, whilst also conforming with the requirement to be a minimum of 6m from ignition sources.

As can be seen in the appendices and detailed in Section 3 of this FPP, separation distances have also been applied to combustible non-wastes such as: diesel for plant, and potentially any quarantined unauthorised waste.

9.0 QUARANTINE

9.1 Quarantine Area

Given the strict Waste Acceptance Procedures employed by MML it is unlikely that any unauthorised waste will be tipped at the Arkwright Street, Oldham site. However, in the unlikely event of unauthorised waste being discovered on site, one of the empty bins stored on site will be used as a temporary quarantine container within the designated flexible quarantine area.

Similarly, if safe to do so, burning or smouldering material could be transferred to an empty bin on site, to prevent the spread of fire.

A flexible quarantine area is available and has been calculated to accommodate half of the largest combustible stockpile (115.2m^3 of cable). The extent of the quarantine area is shown on the site operations plan (Appendix 4).

10.0 DETECTING AND SUPPRESSING FIRES

10.1 Detecting Fires

WISH 28 Guidance outlines that robust and reliable fire detection systems typically have the following aims:

- Inform people of fire to allow for evacuation
- Early warning of a developing situation that may lead to the outbreak of fire
- Activation of a fire suppression/extinguishing system or systems
- Initiation of plant actions to prevent a fire spreading
- Other actions, such as closing of automatic fire doors and/or shutters

Whilst achieving the following aims, WISH 28 Guidance outlines that fire detection systems are not currently common in use at external waste storage areas due to wider influence.

Section 13 of the FPP Guidance requires the fire detection systems to be proportionate to the level of risk posed by the site. Given MML's business model, strict Waste Acceptance Procedure and wider EMS procedures, an elaborate fire detection system is not considered necessary due to low risk of fire on the site. As such, the employed fire detection systems achieve the aims of WISH 28 Guidance and fulfil the FPP Guidance requirements.

10.1.1 Vigilance

During operational hours (as detailed in Section 1.2 of this FPP), the site is occupied by MML Site Management and operatives as well as any attending visitors or contractors. This means that vigilance is a key component of MML's detection system.

All MML Site Management and operatives are trained in identifying the visual and olfactory signs of smoke, smouldering, excessive water vapour, as well as FPP contents and individual responsibilities. All Site Management and operatives are equipped to report any fire detection as soon as possible; this forms part of the 'Site Fires Procedure' from the Accident Management Plan (part of EMS), which is part of the induction for all MML operatives, contractors and visitors. The procedure includes how to respond in the event of a fire and how to report it to Site Management as well as to Greater Manchester Fire and Rescue Service (GMFRS).

10.1.2 Fire Watches

A Fire Watch is a designated, physical inspection conducted by a designated member of Site Management or Operative (Fire Watcher) to identify any visual and olfactory signs of fire.

Observing such signs prior to flame observation allows the fire to be detected quickly which allows for suppression methods to be deployed quicker, thus reducing the impact on key receptors such as the local residents, businesses and the environment.

As all MML Site Management and operatives are trained in the visual and olfactory signs of fire, trained in the location and use of fire suppression equipment, and understand the common causes of fire identified in Section 5.1 of this FPP, this means that any MML Site Management or operative can be a Fire Watcher. It is responsibility of Site Management to appoint a designated Fire Watcher, as detailed in Appendix 10.

Fire Watchers are also responsible for monitoring overall fire safety in MML operational areas. Whilst the frequency of fire watches would be based on a specific risk assessment using the Hot Works Permit and prevailing weather conditions, the minimum frequency of Fire Watches would be hourly. The designated Fire Watcher's hourly check is complemented by a continuous (24 hours per day, 7 days per week) CCTV system, and observations from those working at the MML site, including third-party contractors. This allows for continuous Fire Watches.

As detailed in Section 5.1 of this FPP and Appendix 10, MML operatives are responsible for completing Fire Watches on the mobile plant and equipment they are using. As mobile plant and equipment gets hot whilst in use, especially on hot exhausts and engine parts, any dust or debris settling on the plant provides a fuel source which can spark and ignite. Fire Watches are completed during pre-use plant checks, start and end of breaks, start and end of lunchtime and at the end of the operational day. The latter 3 listed times are especially important due to increased fire risk associated with dust and debris settlement whilst the plant is hot, unmanned and stationary. During the Fire Watches, aside from looking for visual and olfactory signs of fire, operatives will remove or clear up any settled dust and debris on, or adjacent to, plant. Such activity reduces the fire risk on site.

Any Hot Works on site are controlled by an individual Hot Works Permit for the individual job. As detailed in Appendix 10, Fire Watches are completed throughout Hot Works. Hot Works Permits can only be closed by Site Management after the designated Fire Watcher confirms there has been an eventless 30 minutes following the completion of Hot Works. As detailed in Section 5 of this FPP and in Appendix 10, no Hot Works are completed within 1 hour of the end of the operational day. This allows for final Fire Watches by the designated Fire Watcher, which is supplemented by a Fire Watch by Site Management at the end of operational hours.

10.1.3 CCTV

Aside from vigilance and observation, fires are also detected using the CCTV system on site which is operational 24/7 – this allows for continuous fire detection. MML's CCTV system comprises of cameras located around the site. The CCTV system is monitored remotely during non-operational hours by a designated third-party (Aspire Monitoring) as well as by MML Site Management. Due to security reasons, no further information about the site's CCTV system will be provided in this FPP.

It is the responsibility of MML Site Management of contacting GMFRS to attend site in the event of a fire during operational hours. If the fire is detected by Aspire Monitoring during non-operational hours, it is their responsibility to contact GMFRS, then MML Site Management – if a fire is detected during non-operational hours, all fires will be attended by GMFRS. MML Site Management will then contact trained mobile plant staff to attend site to assist with firefighting operations.

10.1.4 Hot Loads

Fire watches are completed during the waste acceptance process which mainly comprise of identifying visual (e.g. smoke), olfactory (e.g. odour) signs of fire in all incoming wastes.

Any burning or suspected burning loads arriving at the MML site will be quarantined and subjected to additional Fire Watches until there are no longer any signs of elevated temperatures. Where required, once sustained, the waste is tipped in the designated tipping area.

Where required, one of the empty bins stored on site will be used as a temporary quarantine container for hot loads.

10.1.5 Fire Alarm

Due to the size of the site, the MML site is not provided with a fire alarm. As discussed in sections 10.1.1 and 10.1.2, in the event of a fire, all site staff could adequately informed of the incident orally.

10.1.6 Abnormal Operating Conditions

MML cannot foresee a period of downtime which would be defined as an abnormal activity. Whilst abnormal, the aforementioned fire detection system will continue to be employed.

Under abnormal, prolonged downtime, MML will cease to accept new waste, and where appropriate, divert to their other site at Uncouth Road, Rochdale, OL16 3DD.

During abnormal, prolonged downtime, there will also be continual removal of waste from the facility which means that stockpile sizes will not exceed those outlined in the FPP. Furthermore, if prolonged downtime involved the cessation of waste operations, such waste removal from site would clear the site in 14 days which demonstrates compliance with FPP Guidance Section 8.1.

10.2 Suppressing Fires

WISH 28 Guidance outlines that smaller waste sites are required to have “basic form of fire detection, alarm and extinguishing/suppression, such as standard fire hoses, or at least quick access to a good water supply such as a public hydrant”. Given that MML is a small waste

site at 0.23 acres, this constitutes a small site meaning that the WISH 28 Guidance reference above is applicable.

10.2.1 Trained, On-Call Mobile Plant Operatives

MML utilise trained, on-call mobile plant staff to assist in fire suppressing and extinguishing operations. The movement of waste requires trained mobile plant operatives and the Site Management (one of whom is a Fire Warden) to coordinate such movements. It should be noted that if GMFRS are orchestrating suppression and extinguishing operations on site, MML mobile plant staff take instruction from GMFRS to facilitate the most effective suppression and extinguishing techniques. In the event of a fire during non-operational hours, Site Management will contact trained, on-call mobile plant operatives to attend site and assist GMFRS with fire suppression.

The following mobile plant will be on site in the event of a fire in operational and non-operational hours, with specifications for such equipment provided as Appendix 11.

- 1 x Mitsubishi Grenadia FD25 Forklift Truck
- 1 x Cesab M325 Forklift Truck
- 1 x Linde H25D Forklift Truck

Below are the benefits of using trained, on-call mobile plant operatives in MML's fire suppression system:

- Provides access fires when MML and firefighters cannot
- Increases access for MML and/or GMFRS equipment to allow for quicker extinguishing (within the 4 hour window outlined in FPP Guidance objectives)
- Assists water and fire extinguisher targeting for deep-seated fires
- Reduces risk of mobile plant being an ignition source for fire spread
- Moves bulky waste to prevent risk of fire spread (FPP Guidance objective)
- Minimises the quantity of water required, thus not depleting a non-renewable resource
- The quantity of firewater reduces the risk of contamination and wider environmental impact from its generation.
- Improved safety for staff and GMFRS

Given the listed benefits, two of which are key FPP Guidance objectives, MML have incorporated the use of trained, on-call mobile plant operatives into the suppression system.

10.2.2 Fire Extinguishers

Appendix 4 demonstrates the position of portable fire extinguishers on site. Having all MML Site Management and operatives trained in using extinguishers increases the opportunity for the suppression and extinguishing of small-scale fires if deemed safe to do so. Furthermore, where extinguishers are unable to fully extinguish the fire, it would provide ample

suppression whilst awaiting the arrival of GMFRS. GMFRS will be contacted by Site Management during operational hours and not the operatives suppressing the fire using extinguishers.

Below is a summary table detailing the fire extinguisher quantities on site, all of which are maintained and serviced in accordance with manufacturer requirements:

Fire Extinguisher Type	Quantity
Powder	3
Water	1
CO_2	2

10.2.3 Off-Site Suppression: Hydrants

Appendix 6 displays the 4 off-site water hydrants which GMFRS have confirmed use at MML via e-mail on 12/07/2024, within 250m of the subject site. The use of hydrants for firefighting complies with Section 42 of the Fire and Rescue Services Act 2004. To confirm, only GMFRS will use the listed hydrants and not MML. Information related to the aforementioned off-site water hydrants is summarised is the table below.

Section 12 of this FPP outlines the water supply provided by the listed hydrants. Based on correspondence with United Utilities on 17/07/2024 via telephone, 1.7 bar was the minimum pressure expected from the hydrants listed below. As the flow rate to these hydrants would be increased in the event of a fire, this means that 1.7 bar is an underestimate of the water available to MML and GMFRS in the event of a fire. To ensure MML have sufficient water availability for fire suppression, 1.7 bar has been used to obtain the minimal quantity of water available for use.

Off-site Water Hydrant Location	Approximate Distance from Site (m)	Pipe Diameter (mm)	Minimum Pressure (bar)
Off Arkwright St	45	100	1.7
Middleton Rd jct Main Rd	50	150	1.7
Arkwright St jct Lansdowne Rd	250	150	1.7
Arkwright St entrance to Westwood Ind. Estate	250	150	1.7

10.2.4 Non-Operational Hours

The site is not manned during non-operational hours. As stated previously, the site's CCTV system is monitored 24/7. The CCTV is monitored remotely by Site Management and Aspire Monitoring during non-operational hours. To confirm, Aspire Monitoring contact MML Site Management upon detection of a fire during non-operational hours. As it is the default position during non-operational hours, Aspire Monitoring contact GMFRS, then Site Management who contacts on-call mobile plant staff to coordinate fire suppression.

10.2.5 Greater Manchester Fire & Rescue Service (GMFRS)

GMFRS is an integral component of the fire suppression system as they may be required to respond in the event of a fire at MML, including during non-operational hours where the attendance of GMFRS is the default position. During operational hours, it is the discretion of Site Management whether GMFRS will be contacted for assistance with fire suppression when the fire cannot be effectively suppressed by MML in a safe manner.

GMFRS is the closest Fire & Rescue Service, located at 177 Broadway, Chadderton, Oldham, OL9 0JX, approximately 1 mile from the site.

11.0 FIREFIGHTING TECHNIQUES

11.1 Resource Availability

The following resources are required for MML to effectively employ firefighting techniques:

- Trained mobile plant operatives
- Trained Fire Wardens
- Effective waste storage infrastructure
- Effective fire detection and suppression infrastructure/equipment and procedures
- Dialogue and inspection with GMFRS
- Site specific procedures such as Waste Acceptance, Quarantine and Hot Works

11.2 Accessibility

Given the design and storage locations on site, GMFRS are satisfied that the layout of the site facilitates fire detection, and the agreed suppression strategy/approach will prevent fire spread, including access for GMFRS and other emergency services if required. MML will work with GMFRS to make any site infrastructural changes if deemed required.

GMFRS have confirmed the use of the off-site hydrants identified in Appendix 6 can service any fire on the site and their hoses will be long enough to reach all areas.

12.0 WATER SUPPLIES

The maximum combustible waste pile on site is 115.2m^3 (cable) meaning that MML will require sufficient water supplies to fully suppress and extinguish a fire in this pile.

Section 16 of the FPP Guidance states a requirement of 2000 litres per minute for a minimum of 3 hours to tackle a 300m^3 pile. Below are the steps calculated to determine the quantity of water MML require to extinguish a 115.2m^3 waste pile fire:

- 2,000 (litres) x 60 (minutes) x 3 (hours) = 360,000 litres of water required in 3 hours
- 360,000 litres = 360m^3
- Determine the factor to scale equation to cater for a 115.2m^3 waste pile
- 115.2 / 300 = 0.384
- 360m^3 x 0.384 = 138.24m^3

The steps above indicate that 138.24m^3 of water is required to extinguish a 115.2m^3 waste pile.

MML has sufficient water supplies to comply with Section 16 of the FPP Guidance which stipulates that sites *"must have enough water available for firefighting"*. Based on correspondence with United Utilities on 17/07/2024 via telephone, 1.7 bar was the minimum pressure expected from the hydrants listed below. As the flow rate to these hydrants would be increased in the event of a fire, this means that 1.7 bar is an underestimate of the water available to MML and GMFRS in the event of a fire.

To ensure MML have sufficient water availability for fire suppression, 1.7 bar has been used to obtain the minimal quantity of water available for use. The summary table below outlines the water supplies for firefighting and demonstrates that the supplies are sufficient when flow rates are underestimated.

Water Supply	**Quantity Over 3 Hours (m^3)**
Off Arkwright St	310.18
Middleton Rd jct Main Rd	896.83
Arkwright St jct Lansdowne Rd	425.49
Arkwright St entrance to Westwood Ind. Estate	425.49
Total:	**2,057.99**

13.0 MANAGING FIRE WATER

As stated in Section 1.2, all treatment and storage operations are completed on impermeable concrete.

Within the warehouse building of the subject site, the impermeable concrete paving slopes towards the centre of the warehouse building. Its design directs any firewater within the warehouse building to pool towards the centre.

The *Protocol for the Disposal of Contaminated Water and Associated Wastes at Incidents* document outlines that firewater and other associated wastes (e.g. burnt waste) should remain on-site in containment until waste classification analysis has been completed. Such analysis will be completed as soon as practically possible, allowing the chemical properties of the firewater and associated wastes to be fully understood so that they can be dispatched to a suitably licenced facility.

If required, MML will commission tankers to pump pooling firewater from the site, including from the following tanker company, with whom they have an existing relationship:

Ancorra Environmental Services, Ancorra House, Knowsley Industrial Estate, Hammond Road, Liverpool L33 7UL (Telephone No. 0151 546 3012).

14.0 DURING AND AFTER AN ACCIDENT

14.1 Role of MML Management During a Fire

As detailed in section 10.1.3, upon discovery of an out of hours fire via the CCTV monitoring system, Aspire Monitoring will contact GMFRS and then MML Site Management. MML Site Management will then contact trained mobile plant staff to attend site to assist with firefighting operations if required.

MML Site Management will assist GMFRS by providing access to the site, and the relevant information (for example, details of the drainage system, location of any gas cylinders etc.)

MML Management will be responsible for supervising the fire suppression and ensuring that GMFRS start recirculating the fire water before the pooling capacity of the site is reached, and firewater is able to escape from site.

Where required, MML Site Management will arrange for tankers from one of the companies detailed in Section 13 to attend site to pump out pooling water.

14.2 Notifying Receptors

Appendix 2 identifies the receptors within a 1km radius of site, with contact details for commercial/industrial properties listed in the Environmental Risk Assessment within the EMS. In the event of a fire, MML will contact potentially impacted receptors which will be supplemented by the attending GMFRS notification to receptors. MML will also contact Oldham Metropolitan Borough Council (OMBC) and the EA to inform them of the fire, with the aforementioned parties also potentially informing other relevant receptors. Contact details for OMBC and the EA are contained in the Accident Management Plan within the EMS.

14.3 Contingency Plan

Whether MML needs to divert waste material is dependent on the following factors:

- *Deemed safe to re-enter and recommence operations by GMFRS*

The MML site will only be re-entered and recommence operations once deemed safe to do so by Site Management or GMFRS (depending on scale of fire). Until such time, no operations will be completed on site.

- *Integrity of infrastructure*

Following a fire incident, MML will ensure that all infrastructure impacted by fire is adequate prior to recommencing storage of wastes and non-wastes, regardless of its combustibility. Such fire infrastructure includes the warehouse building for storage of wastes and scales. This also ensures that MML complies with FPP and WISH Guidance. Storage will only recommence in areas when fire infrastructure meets integrity checks (thus complying with the aforementioned guidance documents) and the scales are fully operational (to track incoming and outgoing tonnages to generate Waste Returns and assist with complying with storage quantities detailed in Appendix 7.

- *Proportion of site impacted by fire*

Although part of the site may be impacted by fire, MML operations may be able to continue if other integral areas remain active – this is suggested under WISH Guidance. Prior to arrival, suppliers, contractors and/or visitors will be notified about accessibility issues, or inability to accept waste or deliveries, to avoid vehicle backup onto Arkwright Street.

Inoperability of the forklift following a fire would have the greatest environmental consequence on site as it will increase waste storage time. As detailed in the Working Plan, although the MML site will have some storage capacity whilst the forklift is non-operational, this will be a fixed amount determined by Site Management to be pragmatic, in line with storage quantities outlined in Appendix 7, and unable to cause detrimental environmental impact.

In the event of the forklift being non-operational and the site reaching the uppermost storage capacity determined by Site Management, MML will communicate with suppliers and contractors to explain that the site is temporarily ceasing to accept waste due to the fire. Where appropriate, wastes would be diverted to MML's other site at Uncouth Road, Rochdale, OL16 3DD.

14.4 Clearance and Decontamination

Clearance will only commence once it is certain that the material is fully cooled and no hotspots have been identified. This will be at least 48 hours following the end of the incident.

Material residues will be sampled and analysed to determine its characteristics which will determine off site disposal options. If not deemed appropriate for on-site recovery, waste should be disposed of at facility authorised to accept the waste. All outgoing material will be accompanied with appropriate waste paperwork and retained by MML for 6 years.

Pooling water on site would be either tankered off site or tested to ensure suitability for discharge to foul sewer.

14.5 Investigation and Reporting

Once deemed safe to return into the site, the fire incident will need to be investigated and reported as per the 'Site Fires Procedure' in the Accident Management Plan. Once the investigation has been fully completed, the wider EMS (including Accident Management Plan) and FPP will be amended accordingly.