



**Biffa Municipal Limited**

**Moorswater Depot**

**Environmental Permit Application (EPR/JB3306KN/A001)**

**Fire Prevention Plan Version 1 – June 2020**

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## 1.0 INTRODUCTION

### 1.1 Report Context

Biffa Municipal Limited (Biffa) has prepared an environmental permit application for the Moorswater Depot (the Site) in Liskeard, Cornwall at NGR SX 23698 63999. The Site is bound immediately to the South by a railway line, beyond this the site is bound to the South and East by agricultural land. To the North, the Site is bound by Moorswater Industrial Estate. The A38 Dobwalls Bypass is ~150m to the north east of the Site and beyond this is the western edge of the residential area of Liskeard. The location of the Site, the permit boundary and waste storage area are shown on the Site Layout plan FPP/02 drawing reference MW030200 and drawing FPP/01 detailing the environmental site setting and receptors located within 1km from the site boundary.

On the 3 October 2020, Biffa takes over the Municipal contract which provides an increased service offering under a Municipal contract with Cornwall Council. Biffa currently operates the Municipal Depot at the Site, the Depot activities include the overnight parking of waste collection vehicles and waste containers, and there are no waste management activities carried out at the Depot and no changes are proposed. The objective of this application is to apply for a new bespoke permit EPR/JK3306KN/A001 to permit the temporary storage of street cleansing residues on Site for bulking prior to off-site disposal.

There will be two x 20 cubic yard/15.3m<sup>3</sup> containers at the site, with a maximum 15t capacity per container. The materials collected will be Street Sweepings, Litter bin sacks and small fly-tips. At least twice per week, or sooner if required, the containers will be removed and taken to a disposal facility by hook lift, and exchanged for empty containers. The street cleaning residues (20 03 03) containers storage area is shown on Site Layout plan FPP/02 drawing reference MW030200.

It is also proposed that WEEE, textiles and batteries may be stored on site under the relevant S1 and S2 exemptions. These wastes will be stored in accordance with the conditions of these exemptions outside of the permitted area and are therefore not considered in this plan.

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

- 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)
- D15 – Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

This document only considers the permitted area detailed on the Site Layout plan FPP/02 drawing reference MW030200.

Biffa operates its existing facilities in accordance with a Group Integrated Management System Environmental Management System (EMS) that is certified to ISO14001. The management system includes a set of procedures that covers all Site activity from pre-acceptance checks, acceptance of waste, storage and handling of waste, to day-to-day operations of the Site. Biffa will implement the existing management system at the facility. A summary of it has been provided within this application, along with a copy of the certificate.

The operations will be the subject of a Site Management Plan ('SMP') and EP. The SMP will form part of the overarching Biffa Group Integrated Management System ('GIMS'), and relate specifically to Biffa's activities at the Site. The SMP details the potential impacts that the activities may have on the environment, including the closest neighbours, and outlines measures in place to control, minimise and mitigate any potential environmental impacts.

This Fire Prevention Plan ('FPP') forms part of the Site Management Plan (SMP) for waste activities at the Site but does not include the depot activities as these are not covered by the EP. The FPP is a requirement of the permit application for the Site due to the type of permit, but not strictly relevant or required for the very limited nature of the waste operations at the Site. As the site will not be receiving a wide range of combustible wastes as defined within the Environment Agency ('EA') guidance 'Fire Prevention Plans: Environmental Permits' all of the usual requirements of the FPP are not appropriate or necessary. This document provides further background and information as to why it is necessary to deviate from the Environment Agency guidance in this instance.

## 1.2 Objectives and Scope

This FPP outlines the approach to the management of potential fire hazards at the Site as a result of the permitted activities, with a primary aim of preventing a fire related incident. In the event of a fire, this plan also describes the means by which the fire will be controlled, and any impacts minimised.

The FPP has been prepared in accordance with the Environment Agency ('EA') guidance 'Fire Prevention Plans: Environmental Permits'.

In accordance with the three primary objectives described in the EA guidance, this FPP describes measures in place to:

- 1) Minimise the likelihood of a fire happening;
- 2) Aim for a fire to be extinguished within four hours; and
- 3) Minimise the spread of fire within the Site and to neighbouring sites.

The waste types to be accepted at the Site are listed in **Table 1**. All waste types are classed as non-hazardous. The wider list of permitted wastes has not been included with this document but these are detailed in Section 1.2 Table 1 of the Site Management Plan.

The maximum amount of waste permitted into the site is less than 5,000 tonnes per year and it is proposed that up to 15 tonnes of street cleaning residues will be stored on site at any one time under normal operating conditions.

**Table 1: Waste Types to be accepted at the Site for storage, bulking and off-site transfer (extract from Table S2.2 of the Environmental Permit)**

Waste Code	Description
20 03	Other municipal wastes
20 03 03	Street-cleaning residues

As only waste EWC 20 03 03 (known as Street-cleaning residues) will be accepted into the site under the EP and it is not combustible then there is no requirement for a FPP at this site. However for the purpose of the permit application Biffa have produced this document as supporting information only and should not form part of the site's management system.

The maximum amount of all street cleaning waste stored at the Site at any one time will not exceed two 20 cubic yard/15.3m containers, each with a 15 tonne capacity so a total of up to 30 tonnes may be stored on site for a limited period especially during the leaf fall season.

## 2.0 ACTIVITIES ON SITE

The following activities relating to the storage of street cleaning residues will be carried out on Site:

- Delivery of street cleaning residues by mechanical road sweepers under the Municipal contract;
- Unloading of mechanical road sweepers into dedicated metal containers;

**Typical storage container for 20 03 03 waste**



- Temporary storage of street cleaning residues in containers;
- Off-site removal of containers by hooklift to a suitably licensed facility for recovery and/or disposal.

The container storage area is on an impermeable surface with sealed drainage and is detailed on Site Layout plan FPP/02 drawing reference MW030200.

The Site will be operational in accordance with the planning permission operation. Incoming road deliveries will tend to be daytime (06:00 to 18:00) and export by road during site operational hours.

## 3.0 SITE PLANS AND MAPS

The following plans are provided as part of the FPP:

- Environmental Site Setting - Drawing FPP/01
- Site Layout Plan – Drawing FPP/02 (MW030200)

## **4.0 SENSITIVE RECEPTORS**

**Drawing FPP/01 – Environmental Site Setting** shows the sensitive receptors located within a 1 km radius of the Site. Due to the very low risk nature of the activities being carried out at the site, which is limited to one non-combustible waste type (20 03 03 street cleaning residues) then fire risk is considered to be extremely low. In addition to this the single waste type is typically damp in nature and therefore presents a very low risk of self combustion. Any sensitive receptors are unlikely to be affected by a fire and therefore no further consideration is required.

## **5.0 MANAGING THE COMMON CAUSES OF FIRE**

### **5.1 Arson**

The integrity of the boundary fencing and the site gates will be inspected in accordance with the SMP. Any damage to the boundary fencing or gates will be made secure by the end of the working day of inspection. If it is not possible to make repairs within a working day, temporary measures will be implemented to control unauthorised access to the Site. Final repairs will be carried out within 5 working days or a longer timescale as agreed in writing with the Environment Agency. A record of all inspections and any repairs necessary together with their implementation is made in the Site Daily Inspection.

### **5.2 Plant and Equipment**

The Site will require limited amounts of plant and equipment. Plant will typically comprise mechanical road sweepers entering the site periodically to discharge street cleaning residues into dedicated containers. Equipment will be needed in the site reception office and welfare facilities but these are not located within the permit boundary and therefore no further consideration is required.

As plant used at the Site to carry out the permitted activities do not remain on site within the permit boundary no further consideration is required. The only equipment remaining on site will be the metal containers storing the wastes and their condition will be maintained so they remain fit for purpose.

### **5.3 Electrical Faults including damaged or exposed electrical cables**

Biffa does however maintain the electric across its property portfolio using fully certified and qualified electricians and there will be written procedures in place that set out the regular maintenance of the electrics. The electrics on Site will be associated with the adjacent Biffa Municipal depot which is not part of the permitted area and therefore no further consideration is required.

### **5.4 Hot Works**

There will be no hot works undertaken on Site.

### **5.5 Industrial Heaters**

There will be no heating required for the permitted activities, therefore no further consideration is required.

## **5.6 Hot Exhausts**

The only vehicles entering the site are the mechanical road sweepers and HGVs to pick up the full containers and replace with empty ones, so these movements are extremely limited and therefore vehicles are not idling or on site for long periods. This section requires no further consideration.

## **5.7 Ignition Sources**

There will be no ignition sources present on Site.

## **5.8 Leaks and Spillages of Oils and Fuels**

There will be no liquids and oils associated with the permitted activities and therefore this requires no further consideration.

## **5.9 Build-up of Loose Combustible Waste, Dust and Fluff**

Wastes to be accepted at the Site are limited to street cleaning residues which are typically damp in nature and are not susceptible to the generation of loose combustible waste, dust and fluff. This section requires no further consideration.

## **5.10 Reactions between Wastes**

Wastes to be accepted at the Site are limited to street cleaning residues and all of these are stored in dedicated containers, there will be no reaction as only one waste stream will be stored on site. This section requires no further consideration.

## **5.11 Deposited Hot Loads**

There will be no hot loads present on Site.

## **6.0 PREVENT SELF-COMBUSTION**

### **6.1 Manage Storage Time**

The street cleaning residues will be stored and removed from site as follows:

- Up to 2 containers will be stored on site
- Each containers has a volume of 15m<sup>3</sup>
- The container exchanges occur 2-3 times per week

As the street cleaning residues are non-combustible waste, typically damp in nature and will not remain on site for a period not exceeding 3 days then no further consideration is required.

### **6.2 Monitor and Control Temperature**

There are no hot loads being transported or stored on Site. The single waste stream being temporarily stored on site is likely to be damp in nature and is non-combustible. This section requires no further consideration.

## **7.0 MANAGE WASTE PILES**

### **7.1 Maximum Pile Sizes**

The waste being stored on site is non-combustible and not stored in loose stockpiles. All of the street cleaning residues are stored in metal containers each with a volume of 15m<sup>3</sup> as show in section 2.0.



Once the container is full it will be transported off site. An exchange of container will occur every 3 days during normal operating conditions. This section requires no further consideration.

## **7.2 Waste Stored in Containers**

The street cleaning residues will only be stored in containers with a typical capacity of 15m<sup>3</sup>.

Due to the non-combustible nature of the waste temporarily stored in containers, there is no risk of fire or spread of fire. This section requires no further consideration.

## **8.0 PREVENT FIRE SPREADING**

### **8.1 Separation Distances**

The only waste accepted at the site is street cleaning residues which are non-combustible and typically damp in nature then the risk of fire is considered to be extremely low and these are stored in containers preventing the risk of fire spread. This section requires no further consideration.

### **8.2 Fire Walls and Bays**

The use of containers is considered to effectively prevent the spread of fire. This section requires no further consideration.

## **9.0 QUARANTINE AREA**

As the site is operated under a municipal contract and only receiving a single waste stream then the risk of accepting unauthorised wastes is very low. A quarantine area is detailed on Site Layout plan FPP/02 drawing reference MW030200. This section requires no further consideration.

## **10.0 DETECTING FIRES**

There will be a procedure in place to detect a fire in its early stages. All site staff will be trained in the detection of fires, emergency procedures and firefighting techniques. A record of all staff training will be held by Biffa

The Site office will be fitted with a smoke alarm and be subject to routine checks to ensure that it remains in working condition. Please note the Site office is not within the permit boundary and forms part of the Municipal Depot and therefore requires no further consideration.

## **11.0 SUPPRESSING FIRES**

The Site Office will be the only indoor area of the Site and will have access to fire extinguishers for use in the event of a fire and is not located within the permit boundary. The office does not form part of the permit activities and is therefore subject to inspection by our Safety, Health and Quality advisors as part of our GIMS. The FPP does not need to consider areas of the site outside of the permit boundary and the waste storage area.

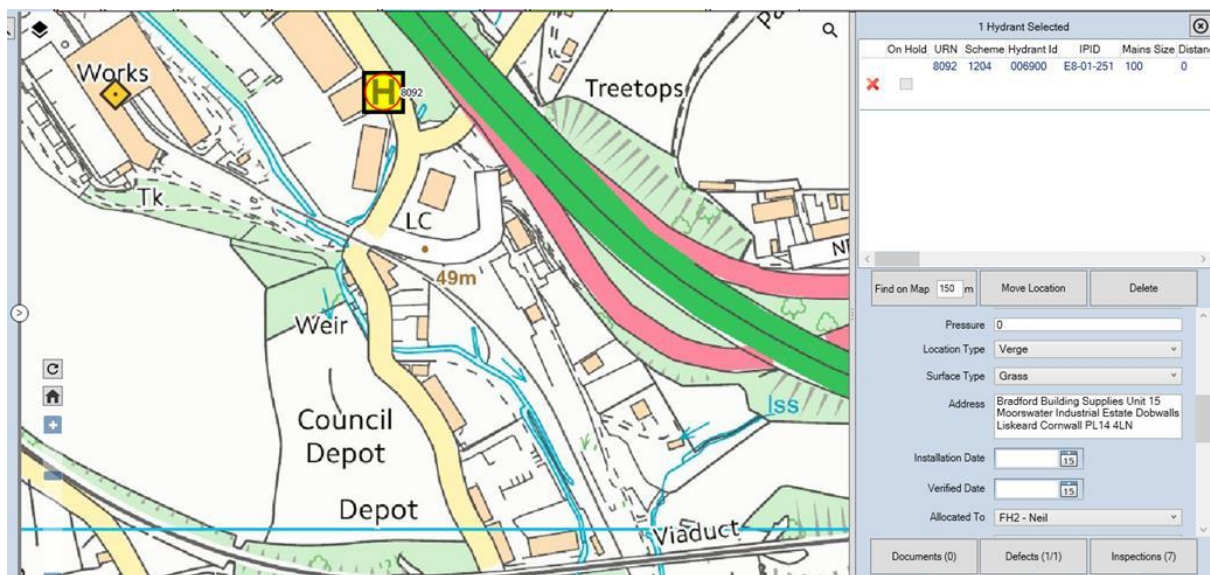
All of the waste will be stored outside, is non-combustible, temporarily stored for short periods and therefore will not require a fire suppression system. This section requires no further consideration.

## 12.0 FIREFIGHTING TECHNIQUES

Firefighting equipment will include fire extinguishers that will be stored in the Site Reception. A chosen number of employees will be provided with fire warden training and a record of this training will be kept by the Site Manager. These areas are outside of the permit boundary and do not need to be considered within this FPP. Biffa does have in place Fire Risk Assessments for these areas.

## 13.0 WATER SUPPLIES

After contacting the Cornwall Fire and Rescue Service the location of the fire hydrant in close proximity to site is shown on the extract below. There is no need for additional firefighting water to be supplied on Site.

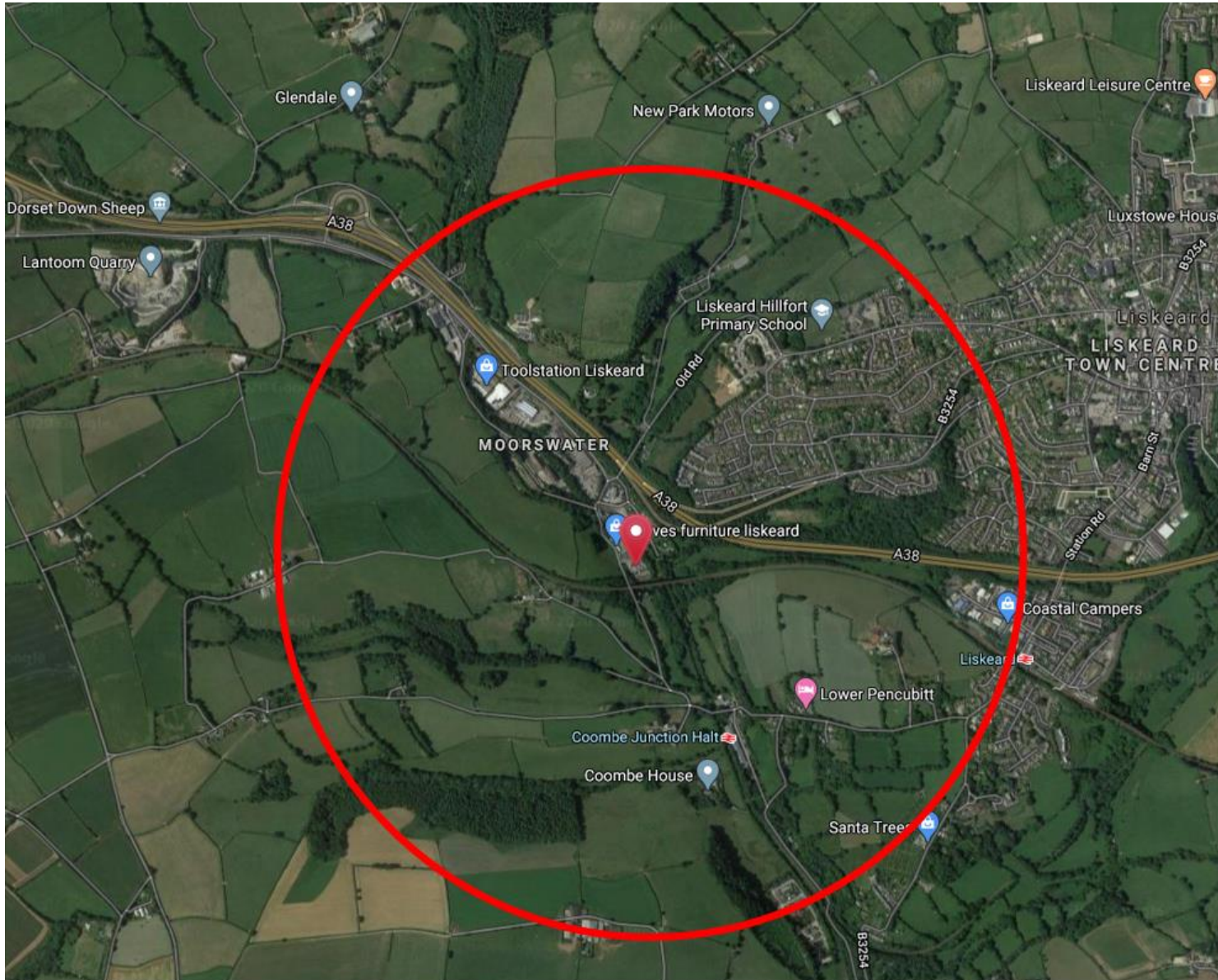


## 14.0 MANAGING FIRE WATER



Due to the non-combustible and damp nature of the single waste stream being temporarily stored in containers the risk of fire is extremely low. In the unlikely event of fire in a waste container any firewater would be stored in that container and then discharged off site at a suitably authorised facility. This section requires no further consideration.

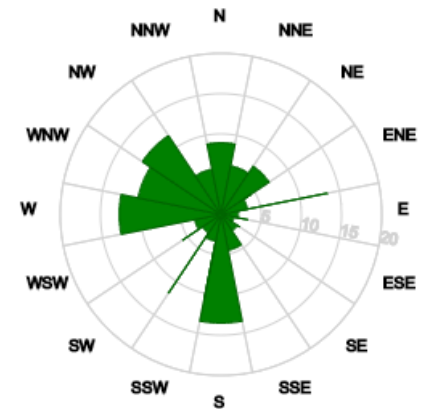
## 15.0 DURING AND AFTER AN INCIDENT

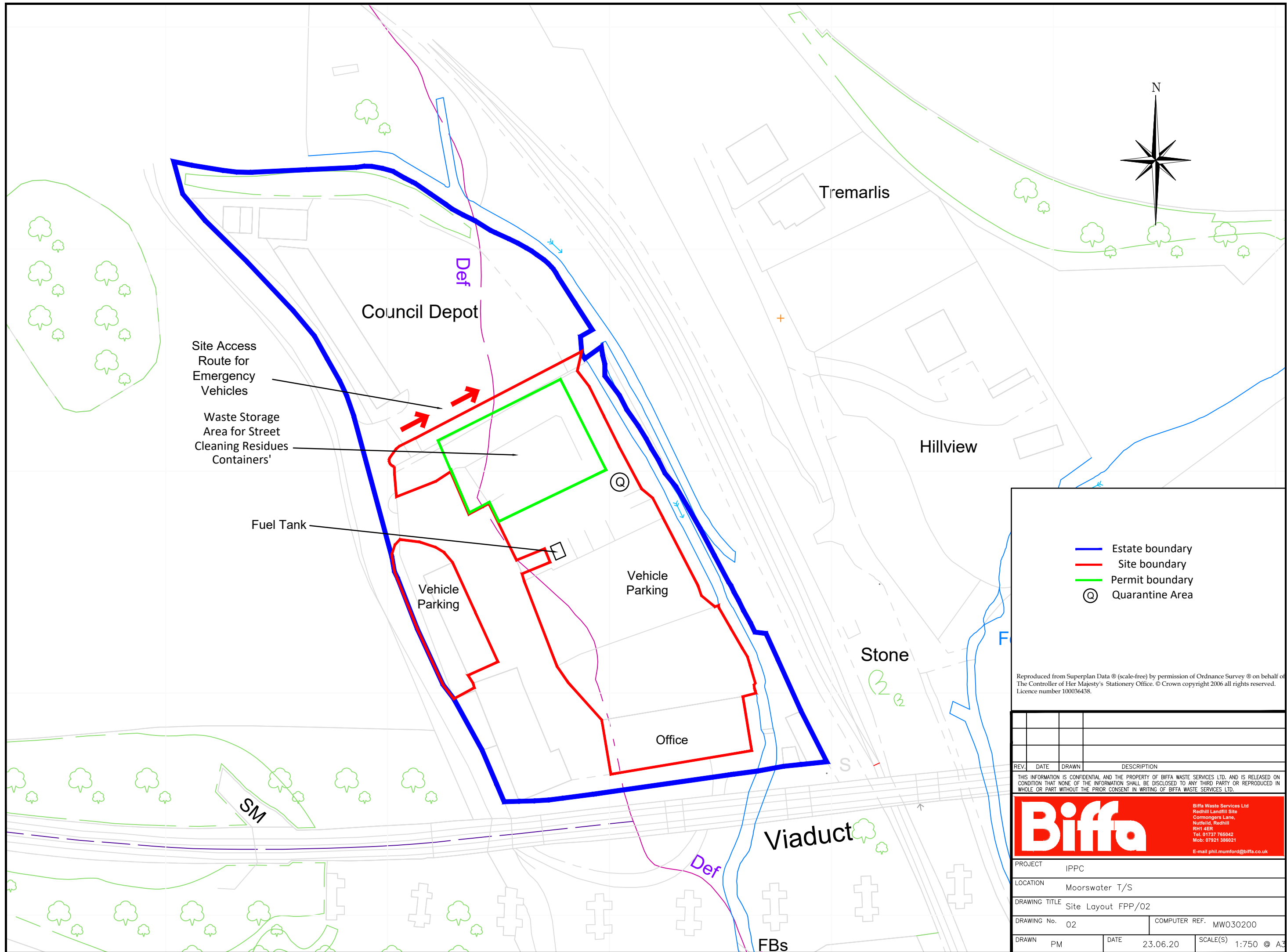
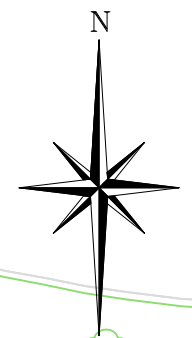
There will be a list of contact numbers of the sensitive receptors nearby to the Site, to notify in the unlikely event of a fire. The Site will be cleared and decontaminated after a fire by designated Site staff members. A record will be kept on Site of any fire related incidents.



**Legend:**

-  Site Location
-  1km radius





Site Access  
Route for  
Emergency  
Vehicles

Waste Storage  
Area for Street  
Cleaning Residues  
Containers'

Fuel Tank

Vehicle  
Parking

Vehicle  
Parking

Office

Tremarlis

Hillview

Stone

Viaduct

SM

Def

FBs

- Estate boundary
- Site boundary
- Permit boundary
- Ⓚ Quarantine Area

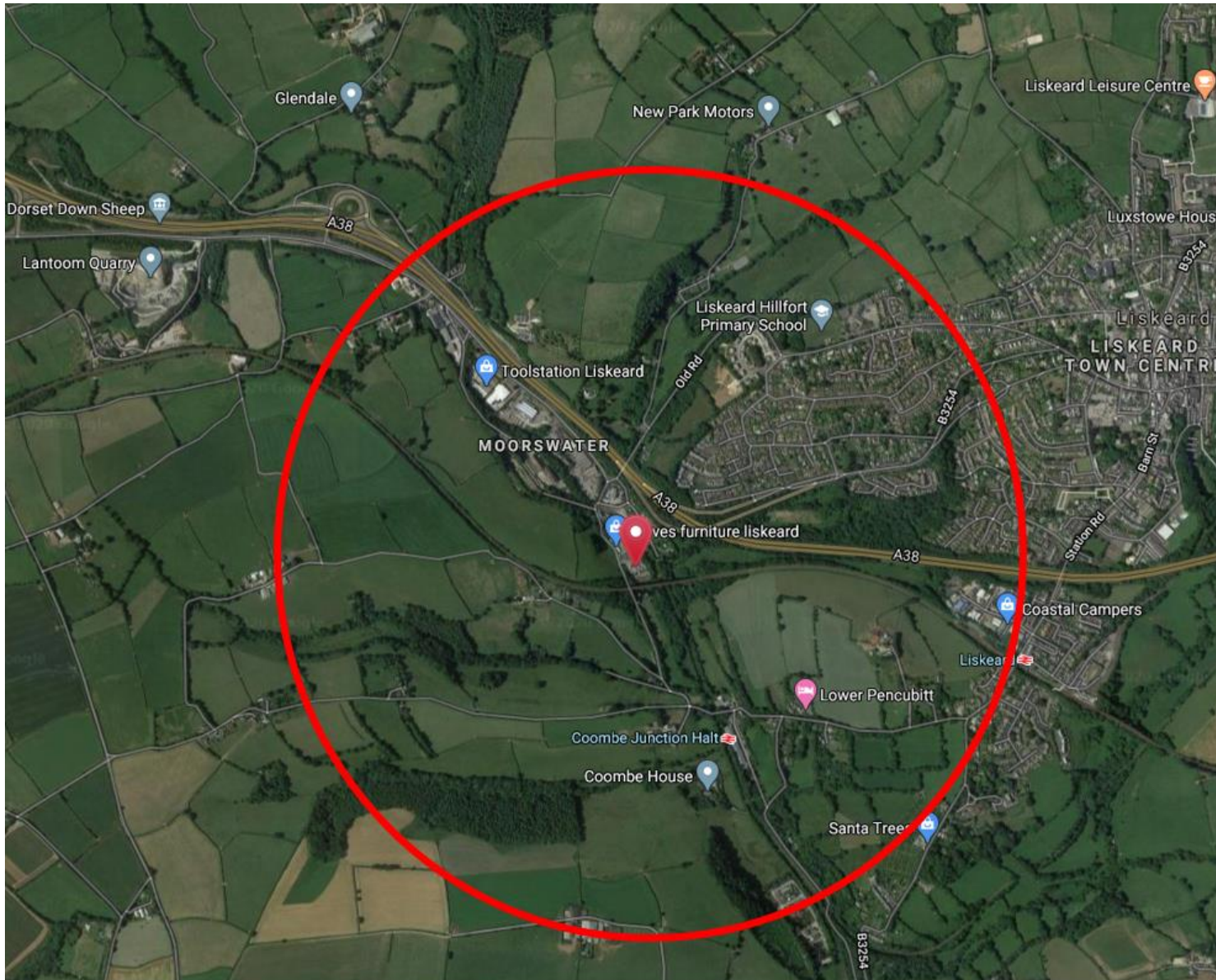
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REV.	DATE	DRAWN	DESCRIPTION



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PROJECT	IPPC		
LOCATION	Moorswater T/S		
DRAWING TITLE	Site Layout FPP/02		
DRAWING No.	02	COMPUTER REF.	MWO30200
DRAWN	PM	DATE	23.06.20
		SCALE(S)	1:750 @ A3



**Legend:**

-  Site Location
-  1km radius

