



Lee Mill Transfer Station

1.7 Fire Prevention Plan

October 2025

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Prepared by	Katie Heath - Environment Permit Manager
Reviewed by	Andrew Jones - Environment & Industrial Risk Manager Richard Smith - Senior Service Delivery Manager
Approved by	Harry Mcleman - I&C Regional Operations Manager
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1 INTRODUCTION

- 1.1.1 This document details the Fire Prevention Plan (FPP) for Lee Mill Transfer Station (the site) located at Lee Mill Industrial Estate, Ivybridge, Devon PL21 9UH at National Grid Reference (NGR) SX 61365 55780. The site location and site layout plan providing the permit boundary are shown in Figure 1 and 2 respectively.
- 1.1.2 This document is written in support of the Environmental Permit (permit) to operate a transfer station with treatment with an annual tonnage of up to 25,000 tonnes. The facility primarily operates as a confidential data destruction centre, and will accept paper, cardboard, plastic films, textiles metals and WEEE (including large appliances, small WEEE and components).
- 1.1.3 Vehicles will be directed to the appropriate storage area to deposit waste and recyclables. The transfer station contains separate storage areas to ensure different waste types are segregated and stored appropriately.
- 1.1.4 A Fire Risk Assessment covering the operation will be in place and reviewed at regular intervals not exceeding 12 months. The Fire Risk Assessment is accessed via the SUEZ electronic risk assessment database.
- 1.1.5 An appropriate person will review this Fire Prevention Plan at regular intervals and on at least an annual basis, following any of the events below:
 - Testing of the plan to ensure the plan works and staff understand the procedures to be undertaken to prevent a fire occurring and the procedure to be undertaken in the event of a fire;
 - an incident;
 - change in legislation or formal guidance;
 - prior to a change in activity on site.
- 1.1.6 In addition, the requirements of the Fire Prevention Plan will be communicated to site operational staff on at least an annual basis via toolbox talks. Yearly refresher toolbox talks will ensure that the requirements of the Fire Prevention Plan are reinforced.

2 RISK OF FIRE

2.1 Assessing the Risk of Fire

- 2.1.1 The risk assessment to identify potential events or failures that may lead to an environmental impact as a result of a waste related fire at site is included in the Environmental Risk Assessment and Accident Management Plan for the site. The risk assessment provides details of the following: the hazard, the pathways and receptors, the probability of occurrence, the consequences or impacts and the measures that will be taken to manage the risk, and an evaluation of the mitigated risk.
- 2.1.2 Further detail on the hazard, in terms of the materials received stored and/or treated on the site, the volumes of materials received, and the potential causes of fires are discussed further in this section of the Fire Prevention Plan. The sensitive receptors and the consequence of a fire on those receptors are also discussed below.

2.2 Combustible Materials on Site

- 2.2.1 The combustible materials which may be received and stored at the site include:
- Mixed paper
 - Cardboard
 - Plastic film
 - Textile
 - Household batteries
 - Small WEEE
 - WEEE components (hard drives and digital storage devices)
 - Large household appliances
 - Metals
- 2.2.2 Other waste types are included in the permitted list of wastes however are not currently being accepted on the site. If additional waste types are accepted, the FPP will be updated accordingly and submitted to the EA for approval.

2.3 Waste Storage and Hazardous Materials Storage

- 2.3.1 Managing waste storage is a key factor, not only in preventing fires, but in mitigating the impact, should a fire break out.
- 2.3.2 Appendix A details the volume, storage time and storage method for each waste type at site.

Waste storage

- 2.3.3 The transfer station has been designed principally to receive, store, treat selected wastes by shredding, and subsequently load wastes for onward transport. Wastes are accepted from household and

commercial premises primarily from the local area. All wastes delivered and accepted to the site will be directed to specific areas on site for storage.

- 2.3.4 The majority of the non-hazardous combustible wastes accepted to the site will be directed to storage areas within the transfer station building. The design capacity of the storage areas ensure adherence to current regulations, see Figure 2.
- 2.3.5 Specific waste types will be stored in containers external to the waste transfer station building in a manner that will prevent pollution to the surrounding environment.
- 2.3.6 An indicative site layout plan showing the proposed location of the waste storage bays and/or areas is shown in Figure 2.

Hazardous materials storage

- 2.3.7 Batteries will be stored in battery boxes that will contain any spillage of battery acid.
- 2.3.8 Small WEEE is accepted into lidded bins to prevent the ingress of any rainwater that could cause contaminated run-off.
- 2.3.9 Large appliances may be stored inside the transfer station building or in a designated external area on impermeable surfacing. Appliances will be inspected at least daily to ensure there is no defects or leaks that have to potential to cause pollution.
- 2.3.10 Oils and lubricants are stored within the vehicle maintenance workshop on bunded pallets and in accordance with relevant legislation.
- 2.3.11 Any hazardous waste delivered to the site that are not allowed under the permit will be segregated and consigned appropriately for disposal at a suitably permitted facility.

2.4 Cause of Fire

- 2.4.1 The potential causes of fire on the site have been considered and include the following:
 - arson or vandalism
 - self-combustion of received and processed waste materials (e.g. chemical oxidation, microbial decomposition), although recent WISH data suggest that this takes far longer than the storage durations proposed in this document
 - plant or equipment failure
 - electrical faults
 - naked lights
 - discarded smoking materials
 - hot works, e.g., welding, cutting
 - hot exhausts
 - fuel deliveries and refuelling plant
 - build-up of dusts
 - damaged/exposed electrical cables
 - neighbouring sites activities
 - sparks from loading buckets

- incompatible wastes
- ignited materials received at the site
- heat generated by friction on mobile plant

2.4.2 Any of the causes detailed above has the potential to ignite waste materials upon the site. The consequences of a fire are discussed below with mitigation measures detailed in a further section.

2.5 Impacts of a Fire

2.5.1 The effects of a fire may be both immediate and long term. The potential impacts of a fire have been considered and are summarized below:

- thermal radiation harming nearby properties and residents leading to fire spread
- creation of hazardous waste by the fire and impacts of firefighting
- explosions and projectiles harming sensitive receptors and spreading the fire to unaffected areas
- firewater run-off transporting pollutants to surface water and groundwater
- transport disruption resulting from road and rail closures
- nuisance from smoke, odour and particulates
- threat to life and property
- detriment of local amenity

2.5.2 The general management actions to mitigate the impact of a fire on sensitive receptors are detailed in Sections 3 and 4 of this Fire Prevention Plan.

2.6 Sensitive Receptors

2.6.1 Sensitive receptors within 1km of the site that may potentially be at risk from a fire have been identified within Table 1 and are shown in drawing in Figure 3.

Table 1 – Sensitive receptors

No.	Receptor	Category	Distance (m)	Direction from site
1	Secondary A (Bedrock) and Secondary Undifferentiated (Superficial drift) Aquifer	Groundwater	0	N/A
2	Streams draining to Heaviland Woods lake	Surface water	450	East
3	Tributary to River Yealm	Surface water	500	West
4	Public footpath	Public Right of Way	0	East
5	Lee Mill industrial Estate	Industrial/ Commercial	0 - 1000	North/ East/ West
6	Properties on Cadleigh Park	Residential	150	East
7	Churchlands Farm	Residential	180	South

No.	Receptor	Category	Distance (m)	Direction from site
8	Public House (The Hunting Lodge)	Commercial	210	East
9	Property on Cadleigh Lane	Residential	290	Northeast
10	West Park/ West Park Lodge/ properties on Hunsdon Road	Residential	310	Southeast
11	St Austin's Priory Roman Catholic Parish Church	Public Building	430	Northeast
12	Hunsdon Farm and surrounding properties	Residential/ Listed Building	450	Southeast
13	Properties on Beech Road	Residential/ Listed Building	450	Northwest
14	Paramount Farm	Residential	500	Northeast
15	Garden Centre (Endsleigh)	Commercial	600	East
16	Three Corners and surrounding properties	Residential	630	Southeast
17	Properties in Ivybridge	Residential	630 - 1000	East/ Northeast
18	Cadleigh Farm	Residential	680	North
19	Strashleigh	Residential/ Listed Building	730	Southwest
20	Lee Mill Allotments	Public Space	740	Northwest
21	Lee Mill Hospital	Public Building	750	Northwest
22	Sewage Works	Industrial	860	West
23	Cadleigh Lodge	Residential	1000	North
24	West Park	Woodpasture and Parkland/ Deciduous Woodland	300	Southeast
25	Woodland in Lower Cadleigh	Deciduous Woodland	370	Northeast
26	Paradise Coppice	Ancient Woodland/ Deciduous Woodland	610	East/ Southeast
27	Woodland on Beech Road	Deciduous Woodland	660	Northwest
28	Great Wood	Deciduous Woodland	880	South/ Southeast
29	Fursdon Wood	Ancient Woodland/ Deciduous Woodland	1000	South

2.7 Wind Direction

2.7.1 The data was obtained for Ivybridge. The prevailing wind direction is from the west. A compass windrose with the prevailing wind direction, is included in Figure 3.



3 PREVENTATIVE MEASURES

3.1 SUEZ Policies and Procedures

- 3.1.1 Section 3.8 of SUEZ Integrated Management System (IMS) relates to Emergency Preparedness and Response and will be followed in the event of a fire or explosion.
- 3.1.2 In addition to Section 3.8, the following policies and procedures, as detailed in the IMS, are also relevant:
- IMS 2.11 Accident Investigation and Reporting
 - IMS 2.12 Site Inspection, Audit and Reporting
 - IMS 2.13 Managing Non-Conformance, Corrective & Preventive Action
 - IMS 2.14 Control of Records
 - IMS 2.15 Audits
 - IMS 3.1 Duty of Care
 - IMS 3.6 Surface Water Management
 - IMS 3.7 Oil and Fuel Storage
- 3.1.3 One of the principle objectives of the IMS is to ensure the efficient and safe operation of the site through the implementation of procedures that ensure defined staff roles and responsibilities supported by provision of appropriate training.
- 3.1.4 Key procedures that apply to all SUEZ sites include training all staff, contractors and visitors in correct health and safety and fire prevention procedures. The implementation of a regular maintenance and inspection programme for all areas of site and equipment to ensure good housekeeping and effective operation of machinery.

3.2 Controls to Manage Common Causes of Fire

Arson

- 3.2.1 Site security to prevent arson includes security fencing and gates which are locked when the site is not in operation. A CCTV monitoring system is installed in various strategic locations around the site as indicated on Figure 4.

Plant and equipment

- 3.2.2 Faults within a vehicle or an item of plant have potential to cause fire, so a regular plant and machinery preventative maintenance programme is in place to identify and remedy potential issues at an early stage.
- 3.2.3 Shredding shall cease at least 1 hour before the end of the operational day after which a fire watch will be undertaken, paying attention for any indications of fire (e.g. smoking, smouldering, flame) originating from the shredding plant or its input and outputs.
- 3.2.4 All vehicles are stored at a safe distance (6m) from waste storage areas when not in use.

- 3.2.5 Fixed and mobile plant will be maintained in accordance with SUEZ Policies and Procedures. This includes daily pre-use inspection checks, reporting of all defects to site management and regular clearing of detritus from around the machine. Each machine will be subject to regular service inspections in accordance with manufacturer's recommendations which will include maintenance of the exhaust and weekly cleaning by the operator.
- 3.2.6 Plant and machinery will not be fitted with an infra-red detection system as it is not deemed as required due to the low risk. However, the mobile plant on site will conform to the SUEZ essential safety requirements as outlined in Policies and Procedures.

Electrical Equipment

- 3.2.7 All portable items of electrical equipment are listed in a register and tested by a competent person at least annually. Items that cannot be shown to have been tested within the previous 12 months must not be connected to the electrical supply.
- 3.2.8 The fixed electrical installations are tested by a competent person at intervals of no more than three years, and any defects rectified as soon as reasonably practicable.
- 3.2.9 Electrical sockets must not be overloaded.

Discarded smoking materials

- 3.2.10 No wastes will be burned within the boundaries of the site.
- 3.2.11 Smoking on site is only permitted in the site designated smoking areas as shown on Figure 4.

Hot works

- 3.2.12 Contractors required to undertake hot works will be required to provide risk assessments and follow approved safe working procedures. Any hot works will be subject to the Permit to Work procedure and will be adequately supervised. In the event of hot works on site the initial fire watch will be undertaken two hours after hot works have been completed. Following the completion of hot works, the end of the day fire watch will pay particular attention to the area where hot works were undertaken.

Industrial heaters

- 3.2.13 There is one overhead industrial gas heater located in the ceiling of the transfer station building.
- 3.2.14 The use of the overhead heater is in accordance with written procedures setting out its proper use and maintenance. The heater is subject to regular service inspections in accordance with manufacturer's recommendations.

Hot exhausts

- 3.2.15 A fire watch will be implemented at the end of the working day to reduce the risk of combustion as dust can settle onto hot exhaust and engine parts.

Ignition sources

- 3.2.16 Any sources of ignition including for example heating pipes, naked flames, light bulbs and space heaters will be kept 6 metres away from any combustible waste.

Leaks and spillages of oils and fuels

- 3.2.17 All machinery/equipment is subject to routine cleaning, servicing in line with manufacturers guidance and daily checks/defect reporting. The daily check includes identification of leaks, and where identified, is cleaned up according to spillage procedure as detailed in Section 3.8 of the SUEZ IMS.

Build-up of loose combustible waste, dust and fluff

- 3.2.18 Site cleaning regimes to reduce dust and litter will be directed through Standard Operating Procedures detailing the duration and frequency of cleaning activities, the equipment required to clean and visual aids depicting how areas should look following cleaning activity. In general, ongoing inspection and regular cleaning is undertaken by site staff to minimise the generation of dust and litter on site. Waste storage areas are cleaned regularly when they are emptied or as and when requested by the Site Manager.
- 3.2.19 Daily check sheets include a requirement for site staff to undertake visual dust qualitative monitoring; if perceived to be excessive the action causing the emission will be halted and remedial measures implemented.

Waste acceptance/reactions between wastes

- 3.2.20 Waste acceptance procedures will comply with the site permit and associated environmental legislation. Only waste types detailed in the permit will be accepted at the site.
- 3.2.21 The documentation accompanying the load shall be checked during waste acceptance, and shall include, but not be limited to the Carriers Certificate of Registration and Duty of Care Waste Transfer Note.
- 3.2.22 The information recorded in respect of each load as provided by the Waste Transfer Note will be:
- Ticket Number
 - Vehicle Registration Number and Type
 - Time and date (or date range) of transfer
 - Waste description and quantities including all EWC codes
 - Container type
 - Where the transfer(s) took place
 - Category of Transferor and Transferee (i.e. producer, WDA, registered carrier, permit holder, EPR etc)
 - Names and addresses of all parties involved in the transfer and their roles (i.e. producer, carrier, disposer)
 - Details of relevant permit/exemptions
 - Signatures of all parties involved
- 3.2.23 Loads will be visually inspected on site as the waste is discharged or unloaded from the delivering vehicle.

- 3.2.24 Waste deposition will generally be undertaken by those delivering the waste. Site staff will direct and assist drivers as necessary.
- 3.2.25 Should any load, either upon entry to the site, or upon unloading, be discovered to contain waste types not permitted at the site or contain incompatible wastes the load will be rejected and removed from site by the delivering vehicle. A load rejection form will be completed in all cases and the customer informed.
- 3.2.26 If wastes not permitted by the site permit are discovered amongst a load after deposit, the waste will be isolated to prevent the processing of this waste, and will be subject to quarantine and removal procedures.

Deposited hot loads

- 3.2.27 A quarantine area is available in the event that a hot or burning load is received on site. This area may also be used in the event of a fire on site.
- 3.2.28 If a hot load is discovered during delivery or deposit of the load, the waste will be isolated and placed in the quarantine area. The waste will be dealt with accordingly (e.g. dampened). The incident and time of discovery will be recorded in the site diary. The waste will be placed in a quarantine area until the fire is extinguished and then loaded into a suitable container. Arrangements will be made for the disposal of such wastes at a suitably permitted disposal facility as soon as practicably possible.

3.3 Controls to Prevent Self-Combustion of Waste

Waste storage procedures and waste piles sizes

- 3.3.1 Managing waste storage at the site is a key consideration in reducing the risk of fire. The waste types, storage detail, maximum volumes/stockpile size, storage duration and location on site are detailed in Appendix A.
- 3.3.2 Waste accepted at the site is inspected whilst being unloaded. Although an ongoing task throughout the day, at least twice daily checks will be made of waste in storage to identify any waste that has potential to cause a fire.
- 3.3.3 All waste entering the site will be logged digitally, records will include weight, EWC codes, date and time. The Site Manager will be able to review the waste acceptance reports to understand the materials that have been imported and exported from site.
- 3.3.4 Clear signage reinforces the safe storage of materials and use of ignition sources.
- 3.3.5 Storage of waste will be managed to minimise the volume of waste stored and limit the storage time as far as practicably possible.
- 3.3.6 Materials will be treated and removed from site in order of receipt and within 1 week so as to reduce the risk of self-combustion.
- 3.3.7 SUEZ seek to remove the material off site as soon as possible. Wastes will not exceed maximum storage capacities. Regular working practice includes the emptying/ removal of containers when the product pile reaches a marked capacity. As the outputs of the process are a valued commodity, SUEZ

seek to remove the material off site as soon as possible in order to release its commercial value. This reduces the risk of a fire arising from self-combustion.

- 3.3.8 Combustible materials stored within containers are fully accessible to allow any fire inside the containers to be extinguished. Containers are accessible to enable rapid segregation if necessary, of burning materials from non-burning materials and vice versa. Containers will be moved using mobile plant following instruction by site manager.

Monitoring and controlling of temperature

- 3.3.9 Waste temperature monitoring at site is not proposed due to the short maximum residence time of the majority of waste types at the site of between 1 day and a week. Some waste types are stored on site in containers up to 3 months due to the low volume received at any one time.
- 3.3.10 Environment Agency guidance requires temperature monitoring to be in place if combustible waste is stored on site for longer than 3 months.

Waste bale storage

- 3.3.11 Appendix A details the maximum size of waste stockpiles, and volumes of various waste types.
- 3.3.12 Bales of cardboard and plastic film are stored in a 40 yard RORO skip. Baled cans are stored in 6 yard open skip. Bales will not exceed the skips' capacity.

Measures to prevent fire spread

- 3.3.13 All waste will be stored on an impermeable surface. The non-flammable nature of the impermeable surface will act as a firebreak, which should significantly reduce the risk of a fire spreading.
- 3.3.14 Containers will be positioned to maintain access to any waste from at least one side, should it ignite.
- 3.3.15 Containers are accessible to enable rapid segregation, if necessary, of burning materials from non-burning materials and vice versa. Containers can be moved using mobile plant following instruction by site manager.

Quarantine area

- 3.3.16 A quarantine area is designated external to the transfer station building which burning material can be moved into (provided it is safe to do so) to extinguish and control fire spread. It is also used to move piles of non-burning material (adjacent to a fire) to prevent spread.
- 3.3.17 The location and size of the quarantine area is provided in Figure 4.
- 3.3.18 As set out in EA guidance, the size of the quarantine area should be sufficient to accommodate 50% of the volume of the largest waste pile and provide a minimum separation distance of 6m on all sides to the nearest pile, building or site boundary.
- 3.3.19 With reference to the pile size dimensions in Appendix A, it is considered that 31m³ will comprise the largest potentially flammable stockpile and therefore the quarantine area size is deemed suitable to accommodate at least 50% of this.

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- 3.3.20 In the event of a fire being detected on site, the material would be dealt with in the most appropriate manner, including either segregation of burning material into the quarantine area or the remaining non burning waste will be segregated to ensure the separation distance from the burning waste. The site has capability to move materials quickly.
 - 3.3.21 The quarantine area is located inside the site permit boundary with at least a 6-metre separation distance with the site office, the site perimeter and any combustible waste piles.
 - 3.3.22 To avoid confusion it will not be marked upon the ground but will be identified to site operatives at the beginning of each shift and emphasise will be made to the need of a 6m fire break from the nearest combustible waste. The site manager will also ensure that no materials are stored within this area and this will be fully communicated at the start of each shift and will be reinforced during yearly toolbox talks on Fire Prevention Plan.

4 DETECTION AND SUPPRESSION MEASURES

4.1 Fire Detection

Fire Alarm System

- 4.1.1 The site is equipped with a fire/spark detection and alarm control panel system that has been designed in general accordance with BS 5839-1: 2013. The fire detection system is connected to the appropriate number of sounders to notify site staff should the detection system trigger during operational hours. The fire detection system is also linked to a remote monitoring station who monitor the system out of hours and notify the local fire brigade and key SUEZ personnel in the event of a fire.
- 4.1.2 The Fire Alarm System will be regularly checked by the Technically Competent Manager (or other designated person) by a visual inspection of the Control Panel. Checks will be recorded in a Fire Logbook. Any fault must be reported immediately.
- 4.1.3 The Fire Alarm System will be tested weekly from a different alarm point – on the same day and time – or at a frequency in line with the manufacturer's recommendations, by a designated person. This will be recorded in the Fire Logbook.
- 4.1.4 The Fire Alarm System will be inspected and maintained by the manufacturer every year in line with the service contract. Inspection and maintenance records will be kept in the Fire Logbook.
- 4.1.5 Fire Alarm points must be kept clear, visible and correctly labelled at all times.
- 4.1.6 The results of the alarm testing and servicing will be held in the Fire Logbook.

Fire Detection System

- 4.1.7 The Transfer Station building is fitted with fire/spark detection system which is linked to the alarm system, as described above, including remote out-of-hours monitoring.
- 4.1.8 In particular the system includes the following:
 - Suitable fire detection within the building which houses the processing equipment.
 - Alarm system to have a suitable 'dial out' facility which connected to local fire brigade control or other monitoring station.
 - Manual call points located around the site as necessary.
 - Additional fire detection to be provided as necessary throughout the site office and vehicle maintenance workshop, integrated into the fire detection system.
 - The main fire panel should be in a suitable location.
 - A zone plan of the fire detection system shall be located above each panel.
- 4.1.9 The shredder is fitted with a spark detection system which automatically suppresses fires before they arise. The control panel for the shredder's fire detection and suppression system is located adjacent to the shredder.
- 4.1.10 The fire detection system will be backed up by batteries in the event of electrical failure.

4.2 Fire Suppression

Extinguishers/ firefighting equipment

- 4.2.1 The shredder is fitted with an automatic fire suppression system fitted by Fagus GreCon, consisting of spark detection and a high-speed water extinguishing system which detects and extinguishes ignition energy within the process before a fire can arise. The system control panels are located adjacent to the shredder. The shredder will only be operated while the detection and suppression system is operational.
- 4.2.2 A mixture of foam, CO₂, powder and water fire extinguishers are placed at key strategic locations around site as indicated on Figure 4. A check of the fire extinguishers (discharged/full, service in date etc) is part of the weekly site check. All fire extinguishers are subject to annual testing by an approved accredited supplier.
- 4.2.3 Site staff will be trained in fire safety awareness and in the use of site extinguishers and firefighting equipment.
- 4.2.4 All fire extinguishers conform to British Standard EN 3 and sited in permanent fire points. The extinguishers are of a suitable size and weight for use by site staff.
- 4.2.5 If operations change a revised fire risk assessment will be undertaken and additional firefighting measures will be implemented if necessary.

Fire hydrants

- 4.2.6 There are three hydrants located on in close proximity to the site. The closest is located approximately 80m north of the permit boundary on the junction of East Way and Gillard Way. A second hydrant is located 115m west of the site on Strashleigh View. The third hydrant is located 135m northwest of the site on East Way opposite the junction to Cadleigh Close.
- 4.2.7 The locations of the hydrants are shown in Figure 4.

4.3 Fire Fighting Techniques

- 4.3.1 Managing waste storage is a key factor, not only in preventing fires, but in mitigating the impact, should a fire break out.
- 4.3.2 Providing access to the site in the event of a fire is a key consideration in containing a fire. Contact details in the event of an emergency are clearly displayed on site. A fire pack will be located inside the office front door in view, clearly marked for the Fire Rescue Service.
- 4.3.3 The emergency access routes to waste storage and quarantine area in the event of a fire are shown on Figure 4.
- 4.3.4 The firefighting procedure detailed in Section 5 must be adhered to if a fire should break out on site.

4.4 Water Supply

- 4.4.1 The water supply for firefighting will primarily be provided from the existing public hydrants. The Environment Agency Fire Prevention Plan requirements state for a 300m³ pile of waste 2,000 litres per minute are required for a minimum of 3 hours.
- 4.4.2 The maximum total volume of combustible wastes stored within the containers at the site is 31m³, equating to a requirement of 207 litres per minute, and an overall 3-hour water supply of 37,000 litres (37m³). Any waste extinguished in a container will need no more than the volume of the container (maximum 31m³).
- 4.4.3 Based on the calculation above it is considered that the three public hydrants are capable of providing adequate volume of water.

4.5 Fire Water Management

- 4.5.1 The volumes of waste managed on site are very low. Based on the largest stockpile of 31m³ of combustible materials, it is estimated that 37m³ (37,000 litres) of fire water would need to be retained in the worst-case scenario.
- 4.5.2 Any waste extinguished in a container will need no more than the volume of the container (maximum 31m³). It is anticipated that the container would retain the firewater, which would also be absorbed into the waste.
- 4.5.3 The site benefits from an impermeable surface that will prevent infiltration of any spent firewater.
- 4.5.4 All areas of hardstanding, impermeable pavement and bays are visually inspected weekly to ensure continuing integrity and fitness for purpose. The inspection and any necessary maintenance subsequently required will be recorded.
- 4.5.5 There are kerbs around the edges of the site that will support the retention of firewater in the event of a fire. Booms and drain mats will be used to prevent the escape of firewater to the surface water drainage system or foul sewer. The total area of the site is approximately 3,000m², easily providing adequate storage for the storage of firewater.
- 4.5.6 Firewater run off collected within the footprint of the site will then be tankered off site for suitable disposal.

4.6 Contingency Plan in the Event of a Fire

- 4.6.1 In the event of a major fire, the emergency procedures will be followed which includes notifying the Fire Service and Environment Agency. A business continuity plan is in place and this includes contingency planning in the event of a major fire. In such an event, the following contingency action plan will be implemented:
- Remove all staff off site to a safe place.
 - Depending upon the scale of the fire, operations on site will be suspended whilst the fire is extinguished.
 - Close site and await further instruction from the authorities.
 - During this period, SUEZ haulage team will be notified.

- Inform nearby residents and businesses. This will be done via SUEZ's communications team.
- Direct waste deliveries/ customers to alternative facilities.
- Any burnt waste or material will be segregated and contained on site, either on site or within containers. This will then be assessed and disposed of to a suitably permitted facility. Any firewater produced as a result of fighting a fire would be contained on site. This would then be removed from site via tanker for subsequent processing at a suitably permitted facility.
- The site will be cleaned prior to operations recommencing.
- Operations will only recommence once the Fire Service have advised that it is safe to do so.
- Internal plant checks may also be required prior to recommencement of operations.

4.6.2 Fire damaged wastes will be disposed of at a suitably permitted facility.

4.7 Out of hours Response

4.7.1 A fire pack is located in a box at the entrance of the site, clearly marked for the Fire Rescue Service (FRS) to access in the event of attending site in the absence of personnel on site. The pack will contain

- Information relating to hazardous materials and their location
- Drainage plans
- Contact details for key holders.

4.7.2 In the event of an out of hours fire when there was no SUEZ presence at site, the FRS would enter site (by force if necessary) and will gain access to the site via the normal site access route.

5 FIRE FIGHTING PROCEDURE

The following procedure must be adhered to if a fire should break out on the site.

ALL FIRES ON SITE MUST BE TREATED AS SERIOUS AND MUST BE REPORTED TO THE SITE SUPERVISOR AND/OR MANAGER AS SOON AS POSSIBLE.

- 5.1.1 It is considered unlikely that a fire will occur but if this should happen then any outbreak of fire will be regarded as an emergency and immediate action will be taken to extinguish the fire. No one should attempt to fight a fire unless they have received training in the use of fire extinguishers and then only if this can be done without risk.
- 5.1.2 If it is safe to do so, attempts should be made to extinguish a fire. This can be done by using site machinery to move any non-burnt material away from the smoulder or source of fire or using water, working from the edge of the fire inwards. Plant and machinery must never be driven into the centre of any fire; this will place both the driver and the machine in danger. If possible, extinguish the fire with a portable extinguisher or water.
- 5.1.3 Should the fire be successfully extinguished by this action, a check should be kept of the area to ensure that the fire does not re-ignite. The area should be vacated until it is obvious that there is no further danger of the fire restarting.
- 5.1.4 If the above action FAILS to extinguish the fire, prohibit all entry to the area, then summon emergency services immediately. Close the site to all members of the public. Any persons already on the site should leave. The Fire Service will be contacted to deal with major fire incidents. Site staff will not be deployed to deal with major fires.
- 5.1.5 Telephone the Fire and Rescue Service (FRS) – Dial **999**. Give the exact details including the site address and telephone number.
- 5.1.6 Before the Fire and Rescue Service arrives staff will:
 - ensure operators of appropriate machinery are standing by in a safe location to help create fire breaks, under the direction of the FRS when they arrive
 - Appoint a clearly identified person to liaise with the emergency services on site. They should identify themselves to the FRS as soon as they arrive
 - ensure access routes are clear
 - use pollution control equipment to block drains and/or divert firewater to a containment area
- 5.1.7 On arrival the FRS should be met by the identified responsible person who must update them with relevant information that will assist them in dealing with a fire more effectively.
- 5.1.8 The designated Assembly Point is in the car park facing the operations yard on the other side of the exit route. All persons must wait at the Assembly point for further instructions. A Fire Warden will ensure that unauthorised persons do not enter the premises and that no one re-enters the site until given permission by a Fire Warden.

-
- 5.1.9 Upon the outbreak of fire, the receipt of waste at the site is to be suspended and not resumed until authorised by the Site Manager.
 - 5.1.10 For a major fire that cannot be quickly extinguished, the Site Manager should notify the Environment Agency immediately by telephone on the incident hotline: 0800 80 70 60. The Agency must also then be informed in writing as soon as is practicable.
 - 5.1.11 Communication with local businesses and residents identified in the sensitive receptor table (Table 1 Section 2.6) will be undertaken in the event of a fire to reduce any environmental damage and risks to human health associated with smoke and dust.
 - 5.1.12 All incidents must be reported in the daybook and on SUEZ's EcoOnline system. The Environment and Industrial Risk (EIR) Manager should be informed so that in turn, full details of the event can be reported to the Environment Agency.
 - 5.1.13 Site operations will not be recommenced until deemed safe to do so by the Local Fire Authority and the Environment Agency.



Appendices

Appendix A – Waste Storage Details

Lee Mill Transfer Station – Waste Storage Plan

APPENDIX B – WASTE STORAGE DETAILS

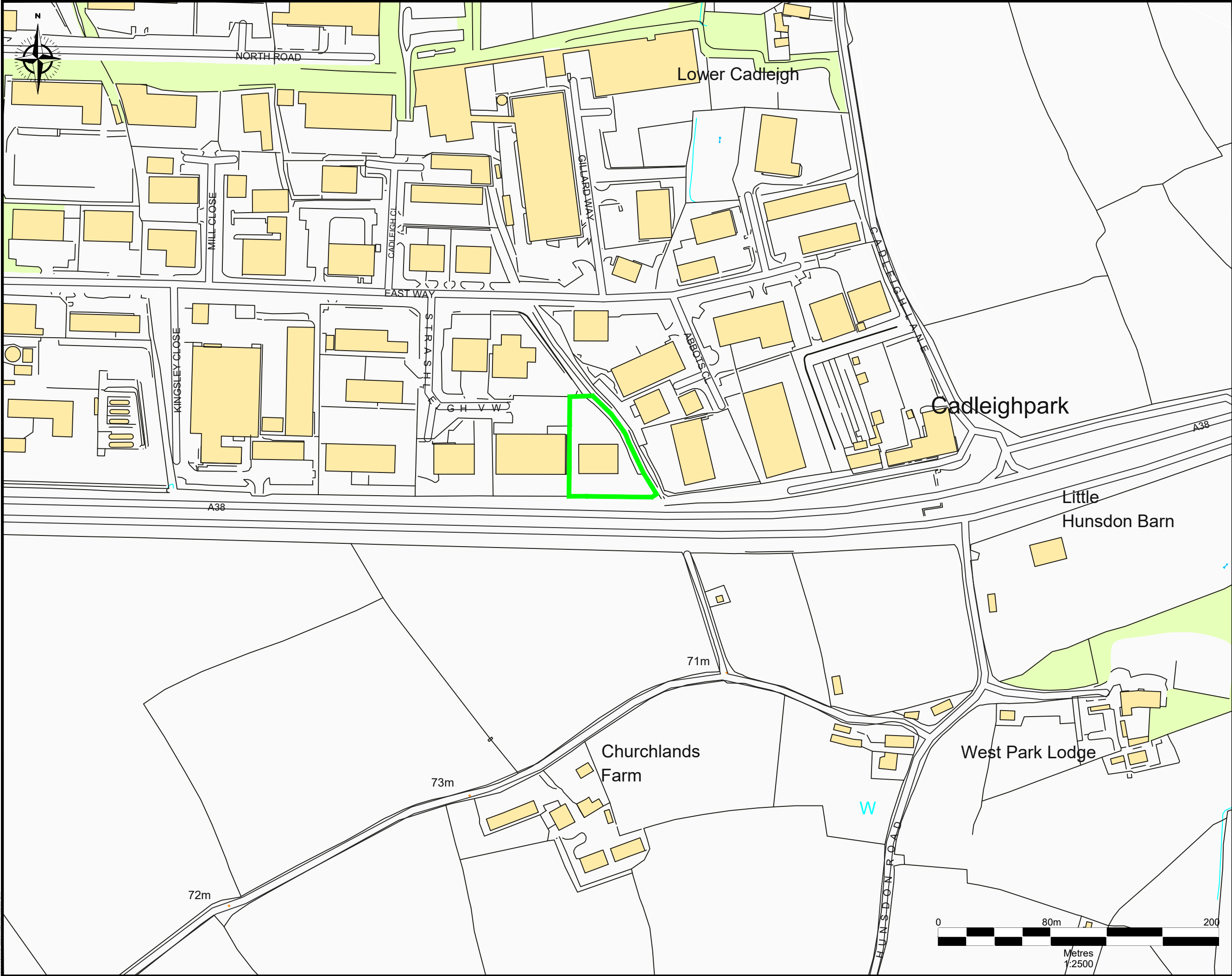
Waste type	Form	Location within site	Storage detail	Bay or Container Dimensions	Volume of waste (m ³)	Maximum storage time on site
Paper (or textile) for shredding	Loose	Transfer Station Building – Pre-shred area	Stockpile	N/A	31m ³	<1 day
Cardboard	Baled	External Storage	40 yd skip	5.8m (L) x 2.4m (W) x 2.7m (H)	31 m ³	3 days
Plastic Films						
Cardboard	Loose					
Shredded Paper (or Textile)	Loose	Transfer Station Building	40 yd Compactor RoRo Skip	5.8m (L) x 2.4m (W) x 2.7m (H)	31 m ³	1 week
Metals	Loose	External Storage	6yd skip	2.6m (L) x 1.5 m (W) x 1.2m (H)	4.6 m ³	1 month
Aluminium cans	Baled	External Storage	6yd skip	2.6m (L) x 1.5 m (W) x 1.2m (H)	4.6 m ³	1 month
WEEE (Large Domestic Appliances)	Loose	WEEE Storage Area	WEEE Storage Area	N/A	3.5 m ³	2 weeks
WEEE (Small Domestic Appliances)	Loose	WEEE Storage Area	660L Wheelie Bin	986mm (D) x 1270mm (W) x 1404mm (H)	0.66 m ³	2 weeks
			360L Wheelie Bin	890mm (D) x 590mm (W) x 1100m (H)	0.36 m ³	2 weeks

Waste type	Form	Location within site	Storage detail	Bay or Container Dimensions	Volume of waste (m3)	Maximum storage time on site
Batteries	Loose	WEEE Storage Area	23L Caddy Bin	260mm (W) x 330mm (D) x 370mm (H)	0.026 m ³	Until full (<3 months)
Hard Drives and other digital storage devices (for shredding)	Loose	Transfer Station Building	660L Wheelie Bin	986mm (D) x 1270mm (W) x 1404mm (H)	0.66 m ³	24 hours
Shredded Hard Drives/ data storage devices	Loose	Transfer Station Building	1 tonne bulk bag	900m (D) x 900mm (W) x 900mm (H)	0.7 m ³	Until full (<3 months)



Figures

Figure 1 – Site Location Plan



Notes

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Ordnance Survey 0100031673/100004910.

Site Boundary

Rev	subject	date



Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel: (01254)819700, Fax: (01254)819749, Email: richard.bisset@suez.com

Site Lee Mill Transfer Station	
Title Site Location Plan	
Scale 1:2500@A3	
Date October 2024	
Drawing Ref Lml-LOC-1024-01	Drawn by JA
	Checked by KH

Figure 2 – Site Layout Plan

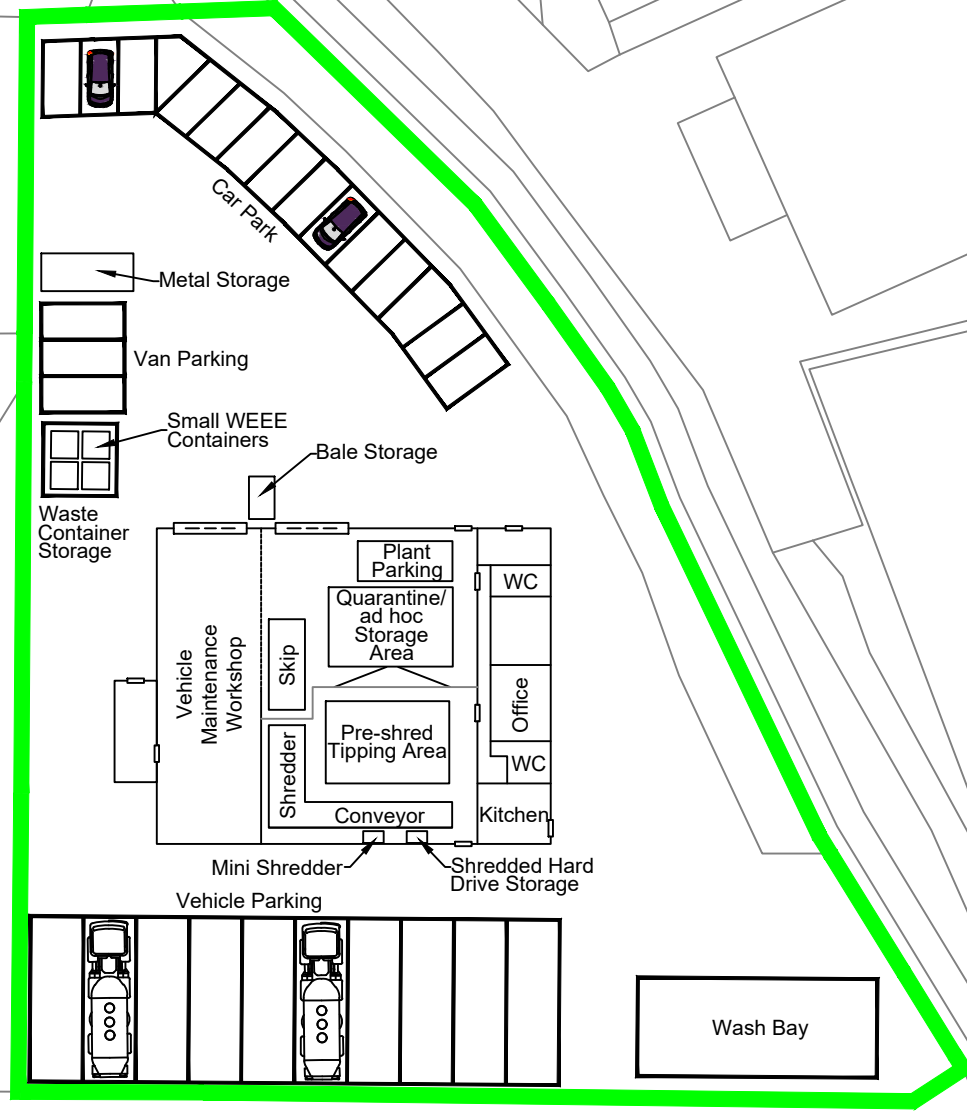


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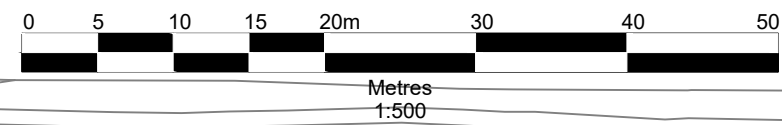
4

1

CLOSE



Wash Bay



Notes

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Site Boundary

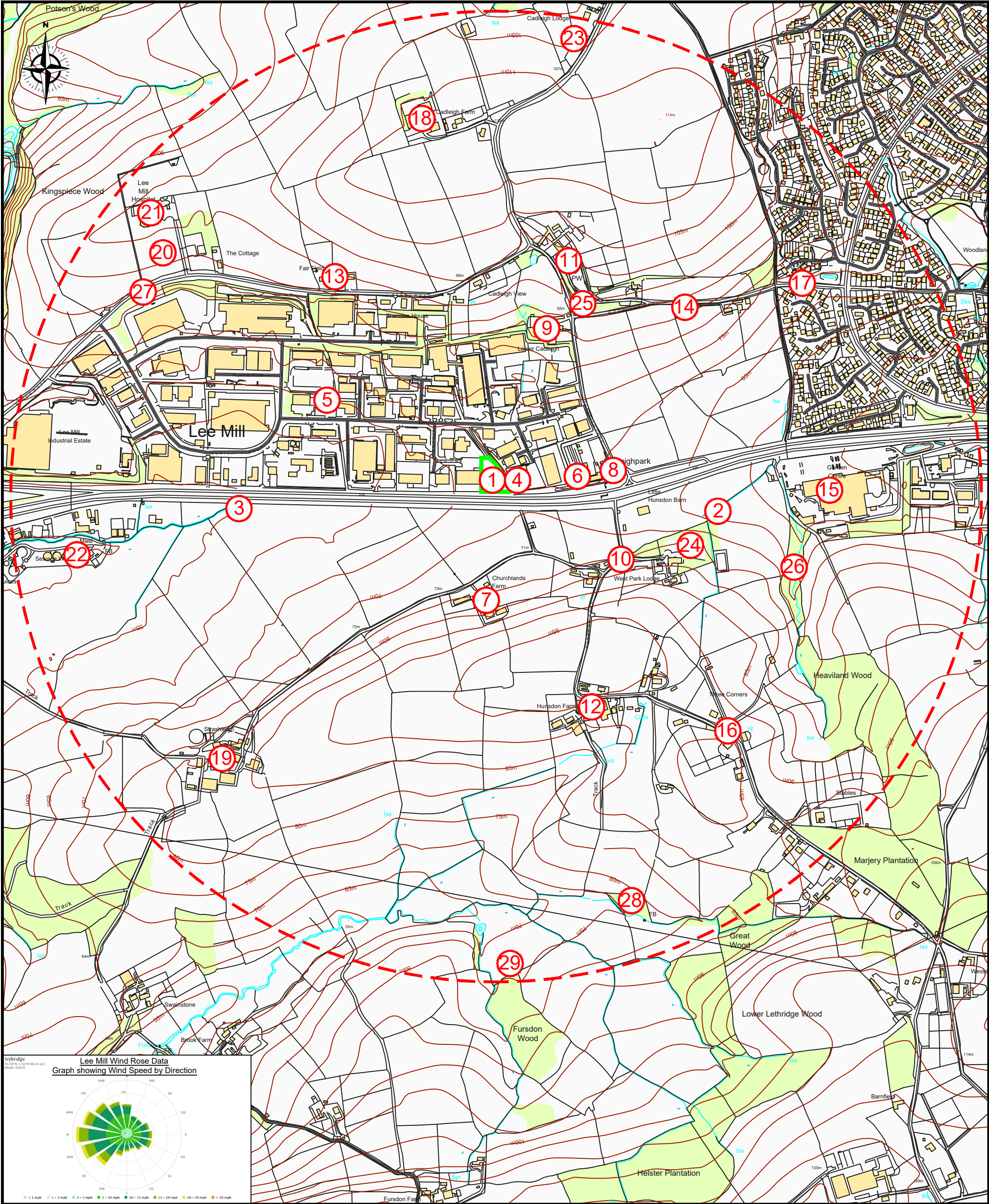
Rev	subject	date



Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel: (01254) 819700, Fax: (01254) 819749, Email: richard.bisset@suez.com

Site Lee Mill Transfer Station	
Title Site Layout Plan	
Scale 1:500@A3	
Date October 2024	
Drawing Ref Lml-LAY-1024-01	Drawn by JA
	Checked by KH

Figure 3 – Receptor Plan



Notes

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Permit Boundary

1km Offset

①

Receptors

0100

100

200m

300

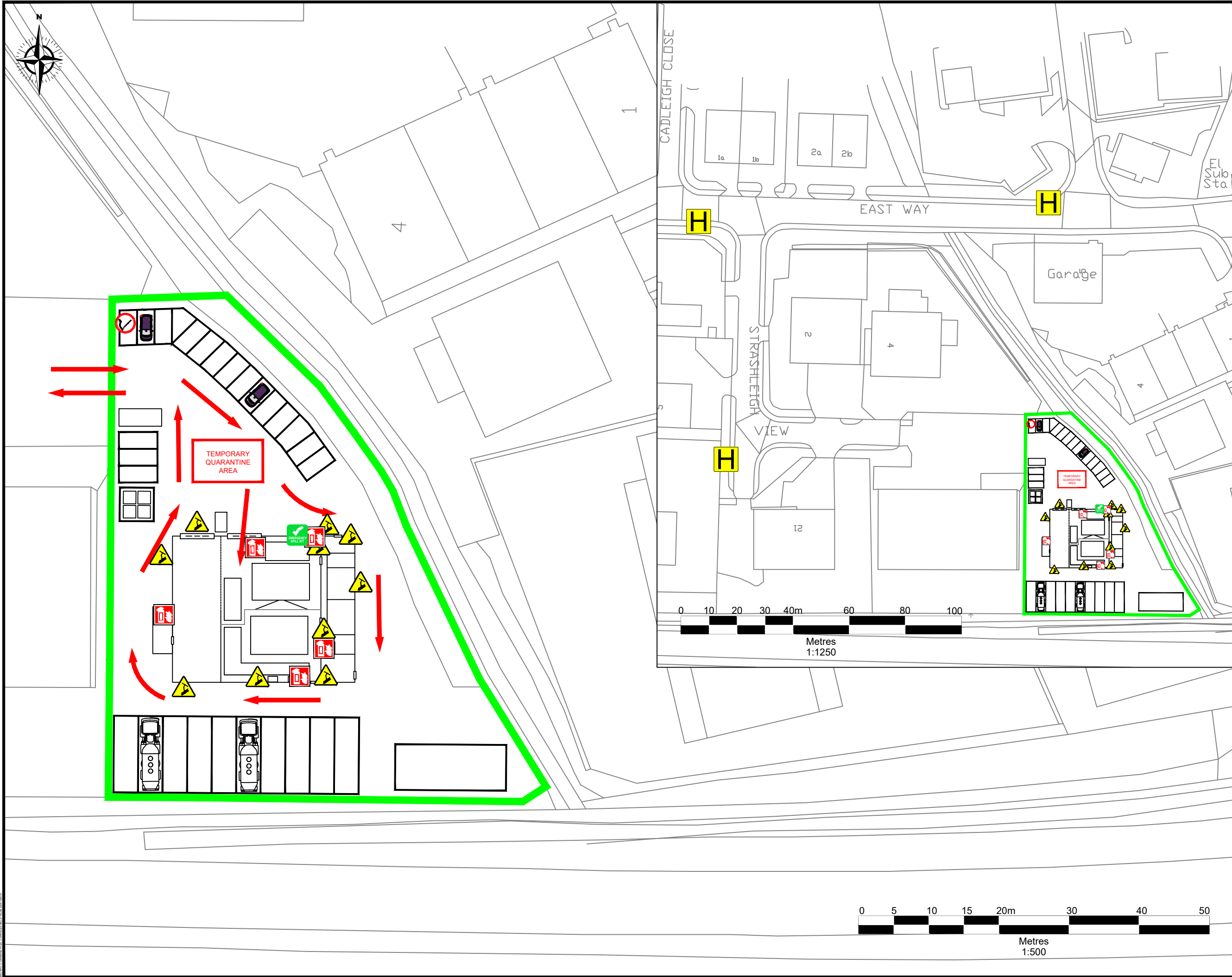
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Metres

1:7500

suez Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP Tel: (01254) 819700, Fax: (01254) 819749, Email: richard.bisset@suez.com	Site Lee Mill Transfer Station Title Receptor Plan	Scale 1:7500 @ A3	Date October 2024	Drawing Ref Lml-REC-1024-01	Drawn by JA	Checked by KH	Rev	subject	date

Figure 4 – Emergency Access Route



- Notes
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- Site Boundary
 - Vehicle Routes
 - Fire Hydrant
 - Emergency Spill Kit
 - CCTV
 - Fire Extinguisher
 - Smoking Area

Rev subject date

suez

Darwen Resource Recovery Park, Lower Eccleshill Road, Darwen, BB3 0RP
Tel: (01254) 819700, Fax: (01254) 819749, Email: richard.bisset@suez.com

Site
Lee Mill Transfer Station

Title
Emergency Access Route

Scale
1:500 & 1:1250@A3

Date
October 2024

Drawing Ref
Lml-EAR-1024-01

Drawn by
JA

Checked by
KH