FIRE PREVENTION PLAN

Recycling Lives Recycling Park, Longridge Road, Preston PR2 5BX

Recycling Lives Ltd

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THIS DOCUMENT IS DUE FOR REVIEW IN **MAY 2021** OR AS A RESULT OF ANY INCIDENTS WHICH MAY LEAD TO THE REQUIREMENT FOR IMMEDIATE REVIEW, WHICHEVER IS THE SOONER

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Site Information & Key Contacts List

Site Address:	Recycling Lives Recycling Park, Longridge Road, Preston PR2 5BX		
Site Operator:	Recycling Lives Ltd	**National Grid Ref:**	SD 57717 32883
CONTACT	**DESCRIPTION**	**OFFICE HOURS**	**OUT OF HOURS**
Recycling Lives Ltd	Site Operator / Permit Holder	01772 654321	999
ADJ Fire and Security Ltd	Out of Hours Contact	01257 233222	999
Royal Preston Hospital Sharoe Green Lane North, Fulwood, Preston, Lancashire PR2 9HT	Local NHS Hospital (Main)	01772 716565	999
	Accident & Emergency (A&E)	999	999
Ribbleton Medical Centre 243 Ribbleton Avenue, Ribbleton, Preston, Lancashire PR2 6RD	Local Doctor Surgery (GP)	01772 529064	999 or 112
Lancashire Constabulary Preston Police Station, Lancaster Road North, Preston PR1 2SA	Local Police Non-Emergency	01772 614444	999 or 112
	Police Emergency	999 or 112	999 or 112
Lancashire Fire & Rescue Service Preston Fire Station, Blackpool Rd, Preston PR1 6US	Fire and Rescue Service (in Emergency Dial 999)	01772 795222	999 or 112
Environment Agency Cumbria & Lancashire Area Lutra House, Dodd Way, Walton Summit, Preston PR5 8BX	Environmental Regulator	0370 850 6506	0800 80 70 60
Lancashire County Council County Hall, Fishergate, Preston, Lancashire, PR1 8XJ	General Enquiries	0300 123 6701	101, 999 or 112
United Utilities Wastewater Services, Lingley Mere Business Park, Lingley Green Avenue, Great Sankey, Warrington WA5 3LP	Mains water and sewerage supplier	0345 672 3723	0345 672 3723
Oaktree Environmental Ltd - Lime House, 2 Road Two, Winsford, Cheshire CW7 3QZ	Secondary specialist waste and permitting compliance advisors	01606 558833	

1 Introduction

1.1 Overview of site operations

1.1.1 This document considers the risks associated with a fire at Recycling Lives Recycling Park, Longridge Road, Preston PR2 5BX. The following permitted operations which take place at the site and are relevant for this Fire Prevention Plan (FPP) are as follows

i) Vehicle storage, depollution and dismantling (authorised treatment facility);
ii) Waste electrical and electronic equipment (WEEE) authorised treatment facility including the manual dismantling and processing (by shredding);
iii) Metal recycling facility; and,
iv) Fragmentising of metal waste and depolluted end-of-life vehicles (ELVs).

1.2 General

1.2.1 The site recently had a fire on 27/01/2019 and an Incident Report has been produced by Recycling Lives Ltd which details the cause of the fire, how the site met the three objectives below and further mitigations (which are outlined throughout this FPP) to ensure the risk of a further fire is minimised. The report is located in Appendix IV of this FPP.

1.3 Fire prevention objectives

1.3.1 This FPP has been designed to meet the following 3 objectives:

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

This FPP document will be kept in the site office and all operational site staff and contractors must be aware and understand the contents of the Fire Prevention Plan (FPP) and what they must do during a fire.

1.4 Summary of site operations

1.4.1 In addition to this document the site will be operated by Recycling Lives Ltd in accordance with a fully comprehensive Environmental Management System (EMS). Reference should be made to the sites EMS which details the acceptance, storage, treatment and removal of all wastes handled on site. In summary the main operations which take place at the site are as follows:

- Compacting (by loading shovel/360° excavator)
- Sorting (with loading shovel/360° excavator or by hand)
- Screening (by using appropriate mechanical screening plant and equipment)
- Separation (by using appropriate mechanical screening plant and equipment)
- Shredding (by using appropriate plant and equipment)
- Baling (by using appropriate plant and equipment)
- Magnetic separation of ferrous metals
- Crushing (by Crusher)
- Depollution and dismantling of waste motor vehicles
- Metal recycling (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)
- WEEE recycling (sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, or cutting of waste into different components for recovery)

1.4.2 The above activities are clearly shown on the Site Layout & Fire Plan which is referenced as Drawing No. RLRP/1040/03 and shown in Appendix I of this FPP.

1.5 Staffing and Management

1.5.1 The site currently has 238 employees working on site throughout a 24-hour period and the table below details the staff structure of the site. Positions in bold italic print below are the minimum staff requirements when the site is open for the reception and processing of waste and, therefore, shows the minimum number of staff available to tackle a fire on site

during operational hours. Only site management [site manager/s, technically competent manager/s (TCMs), site foreman/s], machine/plant operators and general operatives will be permitted to tackle fires on-site.

Table 1.1 - Staffing numbers and responsibilities

Position	Employees	Responsibilities
Managing director	1	Overall management of the business
Directors	5	Overseeing management of the site
Site managers	15	Overseeing and co-ordinating all activities which take place at the site
Sheq manager	1	Ensuring that the site is being operated in accordance with Health & Safety Legislation
Technically Competent Manager (TCM)	1	Ensuring that the site is being operated in accordance with the EP and in-line with attendant regulations
Compliance manager	1	Overall compliance of the site in line with the EP
Site foreman	1	Management of site operatives on site
Machine / Plant Operator s / Operatives	60	Waste handling/processing, reception and plant operation
General operatives including Security guard / watchman	117	To conduct site patrols when the site is not manned / operational
Administration staff	40	Office/administrative duties

1.6 Plant and Equipment

1.6.1 The table below details the plant/equipment on site which may present a fire risk and listed as a potential ignition source. Only trained operators will be permitted to drive/operate the plant/equipment listed below.

Table 1.2 - Item of plant, number and function

Item	Number	Function
Loading shovel	2	Loading/unloading/movement/sorting
360° excavator	2	Loading/unloading/movement/sorting
Telehandlers / re-handling cranes	10	Loading/unloading/movement/sorting
Forklift trucks	30	Loading/unloading/movement/sorting
Pre-shredder and fragmentiser plant	1	Shredding and fragging of scrap metal and ELVs
Depollution rig & tank farm (for storage of drained fluids)	1	Depollution and dismantling of waste motor vehicles
Lefort shear	1	Size reduction and baling of ferrous metals

1.6.2 Note: The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.

1.6.3 Maintenance of all site plant is described in Section 2.5 of this FPP.

1.7 Hours of operation

1.7.1 The site will be operated according to the hours specified below:

Metal Recycling Operations - Fragmentiser

Monday to Friday	07:00 – 20:00
Saturday	07:30 - 13:00
Sundays, Bank/Public holidays	No operations

Metal Recycling Operations - Pre-shredder

Monday to Sunday	05:00 - 04:00
Bank/Public holidays	No operations

Waste Acceptance of ELVs, WEEE and Scrap Metal

Monday to Sunday	05:00 - 04:00
Bank/Public holidays	No operations

Processing of ELVs, WEEE and Scrap Metal not listed above

Monday to Sunday	05:00 - 04:00
Bank/Public holidays	No operations

General Housekeeping / Plant / Vehicle Maintenance

Monday to Sunday	24 Hours
Bank/Public holidays	24 Hours

1.8 Correspondence with Fire and Rescue Service

1.8.1 This document will be sent to the FRS at the same time as the submission of the document to the EA for review.

1.8.2 Recycling Lives Ltd will seek a two-yearly response from the EA and FRS (or sooner should a fire incident occur) with regards to their FPP and associated operations on site. This regular correspondence will ensure all measures to prevent, mitigate and contain fires on site are up to date and deemed sufficient by the FRS.

1.9 Sensitive Receptors

1.9.1 A Sensitive Receptors Plan has been provided in Appendix I to highlight all main receptors within 1,000m of the site which could be affected by a fire at the site.

1.9.2 To minimise the impact on the local area and associated receptors from a fire on site, this document details mitigation measures which will decrease the likelihood of a fire occurring on site and limit the size and duration of a fire if it does occur (as per Section 1.1 above). These measures will ensure the potential impact on any of the surrounding land is as minimal as practicably possible.

1.9.3 The primary sensitive receptors for any fire event would be the site itself and any site users. The surrounding land uses comprise primarily industrial land uses with residential dwellings to the north.

2 Managing Common Causes of Fire

2.1 Details

2.1.1 The following table outlines common causes of fire and outlines specific examples of these sources, the associated risks and any mitigation measures necessary to manage them:

Table 2.1 - Common fire sources and mitigation

Source	Risk	Specific mitigation
Arson or vandalism	Deliberate ignition of wastes by intruder(s) and/or vandalism of site infrastructure, plant and/or machinery which may give rise to malfunction or compromise the integrity of waste storage/containment measures	Site security measures are detailed in Section 2.7.
Plant or equipment	e.g. spillages of fuel, sparks from machinery or malfunction caused by ineffective maintenance	All items of plant are subject to the preventative maintenance checklist and stored 6m away from combustible materials when the site is closed; see Sections 2.5 & 2.6
Electrical appliances and cabling	Faulty appliances or damaged/ exposed electrical cables may spark as a result of a power surge	Fixed wiring testing is carried out 5 years and portable appliances are PAT tested 12 monthly in accordance with Legislation.
Discarded smoking materials	Risk of ignition of stored wastes from smoking materials which have not been fully distinguished	The site has a designated smoking area as detailed on Drawing No. RLRP/1040/03. A smoking policy is shown in Section 2.4.
Open burning on site or on adjacent sites	Risk of ignition from radiative heat or flaming from open burning on site or an adjacent site	There is no open burning on site, all staff are suitably trained by site management regarding the implications.
Overheating of stored waste	sources of heat may include heating pipes, hot exhausts, light bulbs, space heaters or direct sunlight	Stored wastes will be visual inspected throughout the day and turned as necessary to prevent the formation of 'hot spots'. Wastes storage times are relatively low for the site.

Source	Risk	Specific mitigation
Sparks from loading buckets/shovels	Scraping of loading buckets/shovels causing sparks which may ignite stored wastes	Fire extinguishers are fitted in the cab of all loading plant.
Hot works	e.g. welding, soldering, cutting, etc. which involve the use of high temperature equipment which may be a source of both primary and residual heat to stored wastes	The site's hot works procedure is provided in Section 2.3 below.
Industrial heating	Industrial heaters and/or pipework used to heat internal and external areas on site which may, in turn, supply heat to stored wastes increasing the risk of combustion	There are no industrial heaters (or associated pipework) used at the site.
Hot exhausts	Potential source of both primary and residual heat to stored wastes	Daily fire watch and the preventative maintenance ensure the risk is minimised.
Loose material build up around plant/machinery and exhausts	Light waste and ambient particulates with high combustibility settling and building up in key areas in and around plant/machinery and around exhausts	Plant / equipment is monitored daily as per the checklist and dedicated site staff using cleaning agents to keep the areas around plant and equipment clear of debris. Shift teams at end of each shift clean the area around the equipment they have been working on and ensure the equipment is clear all debris and material.
Hot loads	Imported wastes which may contain materials which are above ambient temperature	All loads are inspected in accordance with our waste acceptance procedures. If such loads arrive at site they are intercepted by site operatives who will refuse the acceptance of the waste. They will then if need be directed to the quarantine area to ensure the material does not pose a concern/fire risk to the site. The material will if required be treated to ensure the risk of fire is completely negated.
Overhead power lines	Any overhead power lines on or around the site may ignite in the event of a fire and worsen the effects	There are no overhead power lines which traverse the site.

2.2 Fuel/Oil Storage

2.2.1 The location of fuel storage on site is shown on Drawing No. RLRP/1040/03 and procedures for fuel storage on site are as follows:

- Tanks are surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipework and associated infrastructure will be enclosed within the bund.
- A lock will be fitted to the tank valve to prevent unauthorised operation.
- All valves and gauges on the bund will be constructed to prevent damage caused by frost.
- No combustible waste will be stored within 6 metres of the tank.

2.2.2 The tank will be clearly marked showing the product within and also its capacity.

2.3 Hot Works Procedure

2.3.1 Hot works can take place in various areas of the site i.e. on fixed plant therefore it is not possible to designate an area for this. The site does have designated workshops where other hot works take place i.e. welding, cutting which are shown on Drawing No. RLRP/1040/03. The site's hot works procedure is shown below.

a) Check that hot work is required or could you use an alternative (drill and bolt etc).
b) All hot works must be carried out with a stand-off from other stored materials/wastes on site (i.e. 6 metres). Any hot works which take place within 6m of stored waste will be watched by an additional observer.
c) Ensure the area is cleared of all flammables.
d) Ensure you have TWO fire extinguishers to hand. The type would depend on your working environment but generally a CO_2 and a powder extinguisher would be suitable.
e) Ensure you have used screens to shield bystanders from sparks and welding flash.
f) Ensure you have an observer to watch over you and check for sparks while you work

g) When you are ready to set up you will need to get a key to unlock the equipment from the Site Engineer.

h) When you are set up you must get the site supervisor or manager to check your preparation.

i) If they are happy, they will sign your permit which should be displayed and you can proceed.

j) During cutting/welding your observer should remain with you at all times and be constantly checking the area for sparks or signs of fire.

k) When the work is complete again check for fire and if all looks OK, note the time the hot work finished on the permit.

l) Check again for fire for at least 30 minutes and, if all is clear, the permit must be signed off. This would usually be by the person who authorised it.

m) Hot work requires one permit per person for each day.

2.4 Smoking Policy

2.4.1 Smoking is prohibited in all waste management and storage areas.

2.4.2 Employees who wish to smoke may do so in their own time during lunch breaks. Smoking is only permitted in the designated smoking areas as shown on the Layout & Fire Plan (which are located at safe distances from any potential fire risks or other flammable materials/wastes).

2.4.3 Managers will be responsible for the promotion and maintenance of the policy by their staff. Managers will receive training and guidance regarding their responsibilities in relation to the policy and enforcement of it.

2.4.4 Employees should inform the appropriate manager immediately if anyone fails to comply with the policy.

2.4.5 Employees not complying with the policy will be referred to their manager for support subject to the usual disciplinary procedure.

2.4.6 Visitors not adhering to the policy will be asked to comply or leave the site.

2.4.7 A copy of the policy will form part of new employees' induction packs. Training and guidance on enforcing the policy will form part of new managers' induction process.

2.4.8 The policy will be reviewed every 12 months.

2.5 Preventative Maintenance

2.5.1 All items of plant and equipment listed in Section 1.4 (and any additional items of plant which may be hired in to cover busier periods) are subject to preventative maintenance checks to ensure their safe operation and to prevent any potential situations which may give rise to faults or malfunction. A Preventative Maintenance Checklist is shown in Appendix II of this FPP which can be referenced by the operator.

2.5.2 Much of the plant and equipment on site and all vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis to ensure i.e. daily, before, during and at the end of each working day to ensure (where possible) the machinery is mechanically sound. These checks will be carried out using the Preventative Maintenance Checklist and any results which are flagged as needing attention will also be recorded in the site diary.

2.6 Plant and Equipment

2.6.1 External separation distances of 6m will be observed between plant and stored material when the site is not staffed. In the building, all plant will be powered-down and completely shut off prior to cessation of operations on any given day. Plant which is not in use for any extended period and in any event at the end of the working day will be stored at least 6 metres from combustible wastes.

2.6.2 All plant and equipment vehicles will be fitted with fire extinguishers in the cab. For bucket loaders, rubber strips are not considered appropriate as they are usually removed via uneven and bumpy ground.

2.6.3 Dust from processing/treatment operations on site can settle throughout the working day onto processing plant, plant exhausts and engine parts so a fire-watch will be implemented after cessation of works and equipment powered down for 1 hour each day to remove any dust/fluff using brushes, hoses etc.. Any build of dust/fluff will be removed from the equipment and deposited into a container to await removal from site and site management informed.

2.6.4 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis to ensure, where possible, the machinery is mechanically sound, as described in the section below.

2.6.5 Fuels and combustible liquids from site vehicles (forklift trucks etc.) will be controlled by ensuring each vehicle has undergone the relevant preventative maintenance checks.

2.6.6 Any spillages of fuel will be cleared immediately by depositing sand or absorbents on the affected area and removed to the quarantine area or to a dedicated skip to await removal to a suitably permitted facility. The locations of the spill kits are shown on Drawing No. RLRP/1040/03.

2.7 Site Security

2.7.1 The site security infrastructure is clearly shown on Drawing No RLRP/1040/03 and considered suitable to prevent trespassers.

2.7.2 The site also benefits from 24hr on site security and has remotely accessible CCTV fitted with full site coverage and off-site supervision. The location of CCTV cameras are indicatively shown on Drawing No RLRP/1040/03

2.7.3 The site also has periodic inspections by Keyplus who pro-active perform random visits with routine foot patrols to deter and detect security breaches. Keyplus will then provide feedback to the site to ensure any issues with the security measures are identified so the operator can undertake the appropriate action.

2.7.4 The site security measures (fencing/gates) will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired to the same or better standard within 7 working days. All repairs will be noted on the site diary within 24 hours of the event.

2.7.5 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.8 Electrical Faults or Damaged/Exposed Electrical Cables

2.8.1 All fixed wiring electrical cabling on site will be inspected daily by staff and serviced in accordance with Legislation (3/5 years) by fully qualified and certified electrical contractors to undertake both Planned Preventative Maintenance and Reactive Maintenance (under contract) of the following:

a) Fire detection & alarm system;
b) Emergency lighting;
c) Machinery checks / services (as per manufacturers' instructions).

2.8.2 In terms of portable appliance testing (PAT), this will be serviced annually by qualified and certified electrical contractors.

2.8.3 Daily inspections of cabling, etc. will be undertaken and the daily Fire Checklist can be used as a reference. Any potential ignition sources from suspected electrical faults will be isolated and the appointed electrical contractors will be contacted immediately to rectify the situation. Where possible, staff will immediately remove any stored wastes from the vicinity of the fault area or cable traverse if safe to do so.

3 Waste acceptance procedures

3.1.1 Strict waste acceptance procedures are in place at the site as shown below. Waste is delivered to the site via existing access to the south-west Upon arrival, an operative will direct the driver to the relevant area on site.

3.2 The following details will be recorded for every load deposited at the site:

a) The date and time of delivery.
b) The name and address of the waste producer.
c) The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
d) How the waste is contained e.g. loose, container type.
e) The carrier's name and address.
f) Driver's name, signature and vehicle registration No.
g) Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
h) Additional handling details/notes made by the driver after inspection of the load.
i) SIC code of the premises which produced the waste (where relevant).
j) Waste hierarchy declaration.
k) Information on previous treatment of the waste e.g. manual or mechanical.

3.2.2 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site and the EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of permit conditions or a potential risk of combustion.

3.2.3 **Radiation detection** - The weighbridge to the west is fitted with a high specification radioactive detection system to ensure only suitable loads are deposited at the site and none of a reactive nature.

3.2.4 Waste will arrive at the site primarily consisting of Recycling Lives Ltd's own vehicles/contracts which consist of:

- HGV skip vehicles
- fixed body bulk loaders with a number of smaller deliveries of scrap from,
- 8-wheeled tipper vehicles which can carry loads of up to 18-20 tonnes
- Articulated lorries.

3.2.5 The site also accepts third party deliveries which will be subject to the same procedures above.

3.3 Overview of upon acceptance of waste

3.3.1 In summary the following different categories of waste are accepted and stored in the following areas prior to further processing:

i) Undepolluted ELVs - directed to the undepolluted ELV storage to await depollution and dismantling of all potentially hazardous components; the depolluted ELVs are then directed to the depolluted ELV storage to await pre-shredding prior to fragmentising.

ii) Ferrous scrap metal, baled depolluted ELVs and non-hazardous WEEE are all tipped in the area shown on Drawing No. RLRP/1040/03. The waste material will be tipped and then spread on the floor so that any waste which can't be shredded i.e. pressurised vessels can be picked out.

iii) Once the materials have been sorted then the excavator will move the materials in to the pre-shredder "in-feed" processing area shown on Drawing No. RLRP/1040/03 ready for processing through prior to fragmentising.

iv) Hazardous WEEE will be directed to a dedicated area of the building as shown on Drawing No. RLRP/1040/03 and undergo manual dismantling and mechanical processing.

v) Non-ferrous metal will also be directed to a dedicated area of the building shown on Drawing No. RLRP/1040/03 for storage and treatment.

4 Managing waste storage to prevent self-combustion and the fire spreading

4.1 General

4.1.1 The site stores the following waste types shown in Section 9.1 of the FPP guidance:

- Ferrous metal
- Non-ferrous metal
- ELVs (depolluted & undepolluted)
- Fragmentiser fluff
- WEEE (hazardous & non-hazardous)
- End-of-life tyres
- Plastics

4.1.2 The FPP has also broken down the main storage areas on site into three locations

i) Upper yard (UY) storage areas
ii) Lower yard (LY) storage areas
iii) Internal (INT) storage areas

4.1.3 The site will aim to comply with Section 9.1 of the EA's FPP guidance in terms of pile sizes guidance and reference should be made to Drawing No. RLRP/1040/03 which shows the indicative locations of the above wastes. The waste storage table in section 4.2 details the maximum pile sizes which the site will aim to comply with.

4.1.4 The operator will aim to minimise pile sizes and store waste materials in their largest form as shown below.

4.2 Waste storage table

4.2.1 The following table details the maximum pile sizes and duration for all wastes stored on site:

Table 4.1 - Combustible waste storage table

STORAGE AREA DETAILS (UPPER YARD)							
PLAN REF	DESCRIPTION	STORAGE FORM/ CONTAINMENT	MAX LENGTH / WIDTH (M)	HEIGHT (M)	APPROX. AREA (M2)	CONVERSION FACTOR USED	APPROX. VOLUME (M3)
UY1	LPG TANK STORAGE	STOCKPILE / 3-SIDED STORAGE BAY USING 0.14M CONCRETE PANELS	9	2	115	0.666	155
UY2	MIXED SCRAP METAL (PUBLIC TIPPING BAY)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.14M CONCRETE PANELS	18.5	2	250	0.666	333
UY3	FERROUS METAL (PROCESSED <30MM)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	6	1.5	150	0.666	150
UY4	RECEPTION AREA FOR FERROUS METAL & BALED ELVS (PARTLY PROCESSED >150MM)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	20	4	275	0.666	733
UY5	RECEPTION AREA FOR FERROUS METAL & BALED ELVS (PARTLY PROCESSED >150MM)	FREE-STANDING PILE / 0.6M LEGO BLOCK WALL (WEST); 0.14M CONCRETE PANEL WALL (SOUTH)	20	5	450	0.333	749
UY6	RECEPTION AREA FOR FERROUS METAL & BALED ELVS (PARTLY PROCESSED >150MM)	FREE-STANDING PILE / 0.14M CONCRETE PANEL WALL (SOUTH)	20	5	450	0.333	749
UY7	RECEPTION AREA FOR FERROUS METAL & BALED ELVS (PARTLY PROCESSED >150MM)	FREE-STANDING PILE / 0.6M LEGO BLOCK WALL (WEST); 0.14M CONCRETE PANEL WALL (SOUTH)	20	5	450	0.333	749
UY8	RECEPTION AREA FOR FERROUS METAL & BALED ELVS (PARTLY PROCESSED >150MM)	FREE-STANDING PILE / 0.14M CONCRETE PANEL WALL (SOUTH)	20	5	450	0.333	749
UY9	SHREDDED FERROUS METAL & BALED ELVS PROCESSED (<150MM) / FRAGMENTISER INFEED	FREE-STANDING PILE / 0.14M CONCRETE PANEL WALL (SOUTH)	20	4	325	0.333	433
UY10	SHREDDED FERROUS METAL & BALED ELVS PROCESSED (<150MM) / FRAGMENTISER INFEED	FREE-STANDING PILE / 0.14M CONCRETE PANEL WALL (SOUTH & EAST)	20	4	325	0.333	433
UY11	FRAGMEMTISER FLUFF <30MM (PROCESSED)	FREE-STANDING PILE / CONTAINED IN 3-SIDED 0.6M LEGO BLOCK WALL	20	4	325	0.333	433
UY12	NON-HAZARDOUS WEEE	FREE-STANDING PILE / CONTAINED IN 3-SIDED 0.6M LEGO BLOCK WALL	6	4	300	0.333	400
UY13 - 14	SORTED FERROUS METAL (>150MM)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	7.5	4	35	0.666	93
UY15 - 16	SORTED NON-FERROUS METAL (>150MM)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	5	4	25	0.666	67
UY17	NON-HAZARDOUS WEEE	FREE-STANDING PILE / 3-SIDED 0.6M LEGO BLOCK WALL	17	4	115	0.666	306
UY18 - 21	SORTED NON-FERROUS METAL (>150MM)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	10	4	45	0.666	120
UY22	HAZARDOUS WEEE (FRIDGES)	FREE STANDING IN OPEN FRONT BUILDING / 0.14M CONCRETE WALL	10	2	55	1.2	132
UY23-24	DISCONNECTED BATTERIES	IBC / PALLET CONTAINES <1,200 LITRES	1.2	1	1.2	1	1
UY25-27	UNDEPOLLUTED ELVS	3 NO. ROWS OF 20 ELVS	ROW OF 10	1.5	165	1.5	371
STORAGE AREA DETAILS (LOWER YARD)							
PLAN REF	DESCRIPTION	STORAGE FORM/ CONTAINMENT	MAX LENGTH / WIDTH (M)	HEIGHT (M)	APPOX. AREA (M2)	CONVERSION FACTOR USED	APPROX. VOLUME (M3)
LY1	NON-FERROUS METAL (>150MM) - ALUMINIUM CANS	STOCKPILE INSIDE OPEN FRONTED BUILDING / 3-SIDED 0.14M CONCRETE STORAGE BAY	12	3	110	0.666	220
LY2	FRAGMEMTISER FLUFF <30MM (PROCESSED)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.14M CONCRETE PANELS	18	4	150	0.666	400
LY3 - 4	MIXED SCRAP METAL (30 - 150MM) - ZORBA	STOCKPILE INSIDE OPEN FRONTED BUILDING / 3-SIDED 0.14M CONCRETE STORAGE BAY	8	4	40	0.666	107
LY5	PLASTIC BALES	FREE STANDING BALES / 2 SIDED 0.14M CONCRETE PANEL WALL	15	2.5	115	1	288
LY6	FERROUS METAL (STEEL)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.14M CONCRETE PANELS	12.5	4	160	0.666	426
LY7	FRAGMEMTISER FLUFF <30MM (PROCESSED)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.14M CONCRETE PANELS	12.5	4	160	0.666	426
LY8	FRAGMEMTISER FLUFF <30MM (PROCESSED)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.14M CONCRETE PANELS AND 0.6M LEGO BLOCKS	30	4	225	0.5	450
LY9 & 10	SORTED NON-FERROUS METAL (30MM - 150MM) - ALUMINIUM	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	10	3	85	0.666	170
STORAGE AREA DETAILS (INTERAL / PROCESSING BUILDING)							
PLAN REF	DESCRIPTION	STORAGE FORM/ CONTAINMENT	MAX LENGTH / WIDTH (M)	HEIGHT (M)	APPOX. AREA (M2)	CONVERSION FACTOR USED	APPROX. VOLUME (M3)
INT1	HAZARDOUS WEEE - IT WASTE/MONITORS ETC..	FREE STANDING PILE	20	1	400	1	400
INT2	HAZARDOUS WEEE [TV'S WITH FLAT PANEL DISPLAYS (FPDS)]	FREE STANDING PILE	20	1	400	1	400
INT3	END-OF-LIFE TYRES	STACKED ON RACKING	20	3	100	1	300
INT5	HAZARDOUS WEEE - IT WASTE/MONITORS ETC..	FREE STANDING PILE	20	1.5	250	1	375
INT4	HAZARDOUS WEEE - IT WASTE/MONITORS ETC..	FREE STANDING / IBCS OR PALLETS	20	1.5	250	1	375
INT5	CATALYTIC CONVERTORS	FREE STANDING / IBCS OR PALLETS	15	1.2	50	1	60
INT6	END-OF-LIFE TYRES	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	15	2.5	110	1	275
INT7	SORTED NON-FERROUS METAL (>150MM)	FREE STANDING / IBCS OR PALLETS	20	2.5	80	1	200
INT8	SORTED NON-FERROUS METAL (>150MM)	STOCKPILE / 3-SIDED STORAGE BAY USING 0.6M LEGO BLOCKS	10	1.2	85	1	102
CONVERSION FACTORS FOR WASTE PILES ARE WORKED OUT USING THE FOLLOWING METHODS SET OUT BY THE ENVIRONMENT AGENCY)							
CONVERSION OF 1 FOR MATERIALS STORED WITHIN CONTAINERS, AREA OF STORAGE IN STACKABLE CONTAINERS AND WASTE/BALE STACKS							
CONVERSION OF 0.666 FOR WASTE STORED WITHIN A BAY							
CONVERSION OF 0.333 FOR WASTE STORED IN A FREE-STANDING STOCKPILE							
FOR ELVS AND VEHICLE SHELLS, EACH VEHICLE HAS AN EFFECTIVE VOLUME OF 10M3							
FOR AREAS CONTAINING SKIPS, CONVERSION IS CALCULATED BY VOLUME OF EACH SKIP X NUMBER OF SKIPS							

4.3 Waste storage residence times

4.3.1 The site cannot commit to detailing storage times due to the high throughput and number of storage areas for each pile on site. Each pile stored on site is unique in that it is constantly moved throughout the day.

4.3.2 The above waste types (with the exception of ELVs) are considered non-organic and are not prone to self-combustion therefore do not need specific storage durations. Due to the seasonal fluctuations and markets in scrap metal prices, sites will need to hold stock to ensure they earn a good value for the metal otherwise they will lose significant amounts of money.

4.3.3 Each pile is inspected throughout the day by operational staff and in the event of a fire has suitable techniques shown in various sections of this FPP to ensure any fire could be extinguished within the limitations set out in the FPP guidance.

4.4 Free standing piles

4.4.1 The table overleaf details the combustible waste piles stored on site and procedures to reduce the risk of the waste combusting.

Table 4.2 - Upper Yard Free standing pile references and procedures to comply with the three FPP objectives

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
UY1 **LPG storage and de-gassing area**	• This area contains LPG tanks which have been removed from ELVs during the depollution process. • During the depollution process, all recyclable elements from the LPG tank are removed and removed by forklift to the appropriate storage areas on site; this will mainly consist of small ferrous metal i.e. brackets etc. • The LPG tank is degassed in the adjacent building to remove any potential vapour prior to storage in the pile. • Once the tank has been gassed, it will be stored here temporarily then be processed through the pre-shredder and frag, • The LPG tanks are stored in the 3-sided firewall and are not prone to self-combustion. • Waste will be immediately inspected by operational staff to ensure it is compliant and the different grades of scrap will be taken to the relevant storage areas on site for further processing. • Any reactive on incompatible waste found in this area following tipping will be consigned to the quarantine area or loaded back onto the deposit vehicle. • The waste in this area is then sorted/segregated and is easily accessible for firefighting. • Waste can be visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.
UY2 **Reception area for scrap metal**	• This area is for public tipping of scrap metal following acceptance into the site. • The area is bounded by a three sided 0.14m wide firewall; operational staff will ensure a 1m freeboard is maintained. • Waste will be immediately inspected by operational staff to ensure it is compliant and the different grades of scrap will be taken to the relevant storage areas on site for further processing. • Any reactive on incompatible waste found in this area following tipping will be consigned to the quarantine area or loaded back onto the deposit vehicle. • The waste in this area is then sorted/segregated and is easily accessible for firefighting. • Waste can be visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.

UY3 - UY4 **Mixture of depolluted ELVs and ferrous metals (Baled & non-baled)**	• Baled wastes are accepted using the operators 'Best Available Techniques' (BAT) procedures to ensure they are compliant. • In terms of the ferrous metal, this will have been pre-sorted to ensure it is the correct grade of scrap to reduce the risk of incompatible loads. • These areas are bounded by a three-sided 0.6m wide firewall • Operational staff will ensure a 1m freeboard is maintained by eye. • Tipping will be at the rear of the pile and excavated from the front to ensure good stock rotation and the first in first out principle applies. • These bays can be easily accessed for firefighting. • Waste can be visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.
UY5 - UY8 **Baled ELVs, whole depolluted ELVs and ferrous metal**	• These areas are the main areas where waste is stockpiled on site and are primarily the 'in-feed' piles prior to shredding/fragmentising. • The waste is considered to contain 70% of whole depolluted ELVs and 30% baled therefore the stockpile size has been based on the first column for metals as per Section 9.1 of the guidance. • Baled wastes are accepted using the operators 'Best Available Techniques' (BAT) procedures to ensure they are compliant. • All vehicles will have been fully depolluted and hazardous components removed as set out in the depollution procedure shown in Section 4.5 below. • These areas are bounded by a 6m high, 0.15m wide concrete panel firewall to the north and 6m separation distances between each pile; operational staff will ensure a 1m freeboard from the top of the wall and the 6m separation distance is maintained. If feasible, the storage areas can be painted/marked on the ground to ensure the 6m separation distance is visible and the concrete panels comprise 5 no. 1.2m high panels so staff can use the panel heights as guides. • All of the ferrous metal will have been pre-sorted to ensure it is the correct grade of scrap to reduce the risk of incompatible loads. • Tipping will be at the rear of the pile and excavated from the front to ensure stock rotation and the first in first out principle applies. • The areas are accessible from three sides for fire-fighting. • The quarantine area is adjacent to these piles to ensure waste can be dragged into this area quickly. • Waste can be visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.
UY9 - UY10 **Shredded ELVs, and ferrous metal**	• This waste consists of the fragmentiser infeed and will have been subject to shredding meaning the waste is likely to be <30mm in size. • Pile UY9 benefits from the 6m high, 0.15m wide concrete firewall to the north and the shredder benefits from 5m, 0.6m lego block firewall housing. Pile UY10 benefits from the 6m high, 0.15m wide firewall to the north and east. • Operational staff will ensure a 1m freeboard from the top of the wall and the 6m separation distance is maintained using the same methods in the previous column. • The areas are accessible from two- three sides for fire-fighting. • No form of monitoring other than visual required.

UY11 **Fragmentiser fluff**	• This pile contains the fragmentised waste (fluff) and is the non-metallic element discharged from the eddy current separator. The fluff is <30mm and can be easily scooped into the quarantine area by working plant in the event of smoke, flames occurring following detection by staff. • This area has a dedicated 6m high, 0.15m wide concrete firewall bay for the initial out feed and additional space which allows for an overflow. The same procedures apply in previous sections in terms of operational staff monitoring the pile height/pile size. • The pile is accessible from four sides for fire-fighting. • The area will have to be cleared daily to prevent a backlog on the frag plant. • No form of monitoring other than visual required.
UY12 **Non-hazardous WEEE**	• This area contains non-hazardous WEEE i.e. household appliances which have been pre-sorted on or off site. • No treatment if the WEEE takes place in this area. • This area is bounded by a 5m high, 0.6m wide lego block firewall to the north and east and south and a 6m separation distance to the west and north. • Operational staff will ensure a 1m freeboard from the top of the wall and the 6m separation distance is maintained using previous procedures. • Tipping will be at the rear of the pile and excavated from the front to ensure stock rotation and the first in first out principle applies. • The areas are accessible from three sides for fire-fighting. • The quarantine area is adjacent to these piles to ensure waste can be dragged into this area quickly. • Waste can be visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.
UY13 - UY21 **Storage bays for metals and WEEE**	• All piles will have been pre-sorted to ensure the correct grade/category of scrap/ WEEE is stored to reduce the risk of incompatible loads. • These areas are bounded by a three sided 0.6m, 0.6m wide lego block firewalls and operational staff will ensure a 1m freeboard is maintained. • Tipping will be at the rear of the pile and excavated from the front to ensure stock rotation and the first in first out principle applies. • The waste here has a very low risk of self-combustion as it is not been compacted and therefore will not generate heat. • These bays can be easily accessed for firefighting. • Waste can be visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.
UY22 **Hazardous WEEE (fridges)**	• This area contains non-hazardous WEEE i.e. household appliances which have been pre-sorted on or off site. • No treatment of the WEEE takes place in this area. • The fridges are stored in an open fronted building with 3m high 0.15m wide concrete firewalls forming the construction. • The fridges are not stacked and are only stored on the ground in rows. • The quarantine area is adjacent to these piles to ensure waste can be dragged into this area quickly. • The fridges are visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.

UY25 -UY26 Undepolluted ELVs	• This area is where ELVs are stored prior to depollution. • The site can depollute up to 150 ELVs per day so they are not stored in this area for longer than 1 hour. • The ELVs are stored in rows ensuring there is access from all 4 sides for fire-fighting. • Any vehicles which are severely damaged i.e. leaking oil, burn outs will be depolluted immediately or consigned to the quarantine area. • Any visible oil leaks will be swept up using spill kits and deposited into an adjacent spill bin. • A member or members will continue to monitor this area for presence of oil. • Batteries may be removed from ELVs in this area to prevent short circuiting. • No form of monitoring other than visual required.

Table 4.3 - Lower Yard Free standing pile references and procedures to comply with the three FPP objectives

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
LY1 Non-ferrous metal storage (aluminium cans) prior to baling	• This area is only for aluminium cans which have been accepted from the operator's own deliveries so arrive pre-sorted. • Non-ferrous metals present a very low risk of combustion. • Once an articulated load of baled cans are available the bales will be stored in-situ and collected by an articulated lorry daily. • The non-ferrous metal is stored within an open fronted building ensuring access for fire-fighting. The building has fire walls to the north, east and west to prevent over-spilling and the same rules apply to the previous table in terms free boarding requirements. • The pile is inspected constantly by operational staff using the baler. • When the baler is not in operation, a 6m separation distance from the waste will be applied.
LY2 Fragmentiser wire / fluff	• This pile acts as an overflow pile for piles LY7 and LY8 and will usually be clear of material. • There is a firewall to the south and east and the same rules apply to the previous table in terms free boarding requirements. • Reference should be made to pile UY11 in terms of storage / monitoring requirements.
LY3 - LY4 Mixed scrap metal	• This area is an open fronted building facing south with firewalls to the west, north and east. • The waste is known as 'Zorba' scrap which is essentially waste extracted from beneath the eddy current and is primarily aluminium which is non-ferrous and has a very low risk of self-combustion. • There is access to the pile for fire-fighting. • See pile ref. UY13 - 21 for further storage/monitoring procedures.

LY5 **Plastic bales**	• This area contains the plastic element off wastes which can be recycled i.e. components from WEEE or scrap appliances. • This area comprises an open fronted building facing south with firewalls to the west, north and east. • All of the plastic will have been manually dismantled and is then fed directly into the baler by hand. • Once an articulated load of plastic bales are available, the bales will be stored in-situ and collected by an articulated lorry daily. • The non-ferrous metal is stored within an open fronted building ensuring access for fire-fighting. The building has fire walls to the north, east and west to prevent over-spilling and the same rules apply to the previous table in terms free boarding requirements. • The pile is inspected constantly by operational staff using the baler. • When the baler is not in operation, a 6m separation distance from the waste will be applied.
LY6 **Ferrous metal**	• This area is only for ferrous metal (mainly steel) which has been pre-sorted and accepted from the operator's own vehicles. • Stainless steel presents a very low risk of combustion. • Once the storage bay reaches capacity, not further waste will be accepted into the bay and the load will be collected by an articulated lorry. • The area has fire walls to the north, east and west to prevent over-spilling and the same rules apply to the previous sections in terms free boarding requirements. • The pile is inspected constantly by operational staff using the baler. • When the baler is not in operation, a 6m separation distance from the waste will be applied.
LY7 - LY8 **Fragmentiser fluff**	• Pile 8 is the main discharge area from the radial stacker conveyor from the frag plant and pile LY7 acts as an overflow pile for piles LY8 which will usually be clear of material. • There is a firewall to the south and east and the same rules apply to the previous table in terms free boarding requirements. • Reference should be made to pile UY11 in terms of storage / monitoring requirements.
LY9 – LY10 **Non-ferrous metals**	• All piles will have been pre-sorted to ensure the correct waste is stored to reduce the risk of incompatible loads. • These areas are bounded by a three sided 0.6m wide concrete firewall; operational staff will ensure a 1m freeboard is maintained. • Tipping will be at the rear of the pile and excavated from the front to ensure stock rotation and the first in first out principle applies. • The waste here has a very low risk of self-combustion as it is not been compacted and therefore will not generate heat. • These bays can be easily accessed for firefighting. • Waste can be visually monitored throughout the day by site operatives. • No form of monitoring other than visual required.

Table 4.4 - Internal Free-standing pile references and procedures to comply with the three FPP objectives

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
INT 1 **Hazardous WEEE**	• This area is designated for the storage IT equipment i.e. computers/monitors prior to dismantling/sorting/processing. • There is suitable access for fire-fighting via roller shutter doors to the east. • The storage is flat, on the ground and to a maximum height of 2m; there is a 6m separation distance around all sides of the storage pile. • The IT equipment arrives to the site in the operator's own vehicles and are pre-sorted/segregated to ensure the waste type is compatible. • The IT equipment are not prone to self-combustion. • The IT equipment will be only stored for a temporary measure prior to the above sorting/processing activities. • The IT equipment is stored 6m away from building walls are monitored 24 hours a day by staff. • No form of monitoring other than visual required.
INT 2 & 4 **Hazardous WEEE**	• This area is designated for the storage of TVs containing flat panel displays (FPDs) prior to processing through to the FPD shredder. • There is suitable access for fire-fighting via roller shutter doors. The area has a 2m high, 0.6m wide lego block fire wall to the west measuring 20m in length and the rest of the pile is open allowing access for fire-fighting. • The FPDs arrive to the site in the operator's own vehicles and are pre-sorted/segregated to ensure the waste type is compatible. • The FPDs are not prone to self-combustion. • The FPDs will be only stored for a temporary measure prior to being shredded or if the shredder is not in use. • The FPDs are only stored to a height of 1m and there is access from above as well as four sides. • The FPDs are stored 6m away from building walls are monitored 24 hours a day by staff. • No form of monitoring other than visual required.
INT 3 **Tyres**	• This area contains tyres which are wrapped ready for removal off site and stored as a temporary measure. • The tyres will have a 6m separation distance from all four sides. • The tyres are not prone to self-combustion and are continually monitored by trained operatives inside the building at all times. • The tyres have not undergone treatment so will not overheat. • The tyres will not be stored higher than 2.5m. • No form of monitoring other than visual required.
INT 5 **Catalytic convertors**	• This is a dedicated portioned area for catalytic convertors (cats) which are non-combustible and only stored internally due to risk of theft. • The relevant item of scrap will have been removed during the depollution process meaning it will not spark or overheat which could start a fire. • The cats will be stored in containers or on the floor to allow for easy access i.e. removal. • The cats are stored to the height of the container i.e. 1.0m - 1.2m. • No form of monitoring other than visual required.

INT 6 **Tyres**	• The same procedures apply here to INT 4 and consist of tyres prior to wrapping for export. • The tyres are contained within a three-sided firewall ensuring the freeboard procedure applies. • All other procedures are detailed in the INT 4 column.

4.5 Waste stored in containers

4.5.1 The table below details the waste types which are stored in containers at the site.

Table 4.5 - Container references and procedures to comply with the three FPP objectives

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
UY23 **Battery storage (IBCs)**	• Dedicated IBC containers which contain the batteries each have volume of 1000 litres. • The above containers are stored under cover within the depollution building. • There is access to the containers via the depollution building open front and they would be removed from site when full using a forklift truck. • **Stock rotation** – For IBCs containing batteries, these will be removed as 'loads' for onward distribution to a permitted facility and will be stored in stacks comprising a single load. Once the stack is full, the batteries will be loaded onto a delivery vehicle and removed from site. • No form of monitoring other than visual required.
INT 7 & 8 **Non-ferrous metal storage and despatch area**	• These areas are designated as the 'non-ferrous' areas and contain the high value metal which are largely non-combustible and stored internally due to risk of theft. • The relevant item of scrap will have been pre-segregated on arrival meaning it will not spark or overheat which could start a fire. • All scrap is deposited in the despatch area (INT 10) and loaded into the appropriate container then stored in INT 9 prior to onward recycling. • No form of monitoring other than visual required.

4.6 Where pile sizes don't apply / ELVs

4.6.1 Undepolluted ELVs are brought to the site via a recovery vehicle then manoeuvred (driven or by plant) into the area on Drawing No. RLRP/1040/03 to await depollution. The ELV will depolluted within 48 hours on arrival to the site as per the following procedures:

- Disconnect battery and remove from ELV - store in adjacent containers (**UY23**).
- Set heater control to maximum and then remove fuel, oil filter, coolant, washer, brake fluid and power steering caps. The liquids will be removed/drained and stored in the tanks shown on Drawing No. RLRP/1040/03.
- Wheels are then removed and stored in one of the relevant areas on site or sold if suitable.
- Other items such as catalytic convertors will be removed from the ELV and deposited into the containers in **INT 6**.
- The ELV will then be assessed for pyrotechnic devices and deployed using a suitable procedure or removed from site for subsequent neutralisation.
- It would take approximately 15-30 minutes to drain the vehicle and then the ELV will be deposited in Piles UY5 - UY8.

4.7 Fire walls and bays

4.7.1 The concrete firewalls shown on Drawing No. RLRP/1040/03 and described above consist of a mixture of:

i) 0.6m sealed interlocking lego blocks; each block measures 1.6m x 0.6m x 0.6m and manufactured by a reputable company; and,
ii) 0.14m reinforced concrete panel walls.

4.7.2 The walls on site are used to separate waste material where either:

i) Waste is stored without separation
ii) Waste is stored within 6m of the site perimeter

iii) Waste is stored within 6m of internal/external building walls (with the exception of non-ferrous metal which is considered non-combustible)

4.7.3 **Freeboard** - Where waste material is stored against walls a minimum 1m freeboard will be maintained so in the event of a fire, flames/waste material will not spread into adjacent bays and accelerate the spread.

4.7.4 The concrete walls are designed and constructed to the BS8110 Pt2 'Structural use of concrete Part 2 Code of practice for special circumstances' and BSEN1992-1-2 'Design of concrete structures. General rules. Structural fire design' and in accordance with BSEN1992, the fire resistance of concrete structures over 100mm will have a fire resistance of 1200^0C for 4 hours.

4.7.5 As the walls have been manufactured by suitable companies and to a British Standard the walls will:

- resist fire (both radiative heat and flaming)
- have a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within 4 hours

4.7.6 All waste stored within walls is accessible from at least one side to ensure the waste can be removed using the large number of plant available at the site,

4.7.7 The firewalls will be checked as part of the below daily inspection programme and any other walls installed at the site will be supplied by a BS supplier.

4.8 Waste stored in excess of 4m

4.8.1 As detailed in the Waste Storage Table, Piles UY5 - UY8 are stored to a height of 5m which exceeds the limits shown in Section 9 of the FPP guidance. The waste piles in this area are surrounded by 6m concrete fire walls (Section 5.3 for details) which will prevent free boarding and stop a fire spreading if one were to occur.

4.8.2 The site operates 10 re-handlers during operating hours, and will be able to mobilise at them immediately in the event of an incident to assist with firefighting.

4.8.3 The operator will also propose a simple yet practical test at the site, viewed by the FRS & EA, to demonstrate that a 5m pile can be easily dismantled by the re-handlers in good time.

4.9 External heating

4.9.1 As demonstrated is section 4.3, the external piles are not prone to self-combustion therefore will not be prone to external heating. There are no measures proposed to shade stored waste from direct sunlight as piles are constantly turned throughout the day ensuring hot spots do not generate on stockpiles.

5 Site inspection programme

5.1 Daily checks

5.1.1 Site management are responsible for carrying out daily site walks for checking drainage systems, security measures and waste storage areas. Site management can reference the Fire Checklist shown in Appendix II but will use internal check sheets. The site also carries out weekly inspections for firefighting equipment to ensure they are fit for purpose.

5.1.2 Carrying out the above checks daily will keep the levels of dust, fibre, paper and other loose combustible materials, which could aid in the acceleration of a fire, on site surfaces to a minimum and ensure all containment of wastes on site are functioning effectively in accordance with the storage limitations provided in the table on Drawing No. RLRP/1040/03.

5.2 Staff training

5.2.1 Operational staff are subject to site inductions which includes basic fire emergency procedures. The site has trained fire marshals and fire trained engine operatives who are able to carry out these inductions.

5.2.2 A full test (drill) of the procedures in this document will be carried out every 12 months to test that the plan works. The first test will take place within one month of the agreement of this document with the EA. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS. The Fire Checklist may also be used during the drill.

5.3 Toolbox talks

5.3.1 All operational staff on site have received fire awareness training / tool box talks off trained staff i.e. the operations, site or technically competence manager on their staff induction to detect early signs of fire and to minimise the chance of a fire breaking out in order to meet the three objectives.

6 Quarantine Area

6.1.1 In accordance with the EA's FPP guidance an area of the site has been designated as the quarantine area as shown on Drawing No. RLRP/1040/03 which is accessible at all times. This area also allows for a 6-metre buffer from the site perimeter and other stored waste or materials on site.

6.1.2 The quarantine area has a 20 diameter and if waste was stored to a height of 4.0m as a free-standing stockpile could hold a volume of approximately 400m^3 of material. This is calculated by using the area x height x conversion factor of 0.333 for a free-standing stockpile. Therefore, the quarantine area has the capacity to contain >50% of the maximum pile size for combustible waste on site which is 750m^3.

6.1.3 Waste would be moved to the quarantine area using the sites large number of mobile plant at the site i.e. cranes, loading shovels, excavators etc.

6.1.4 In the event of a fire the areas will be used either to isolate wastes which are smouldering to allow safe dissipation of heat without placing other areas on site at risk of ignition or to remove any wastes stored in bays/pile/containers near any material affected by a fire to prevent fire spreading to adjacent piles. Waste will be moved to the Quarantine Area immediately and within one hour of a fire starting at the latest (if safe to do so).

7 Detecting Fires & Response Procedures

7.1 Fire detection procedure (manual)

7.1.1 If a fire is detected or suspected by a member of staff during operational hours, it must be immediately reported to site management. The relevant person will then conduct the following procedure:

a) Raise the fire alarm (if not already done by another staff member).
b) Initiate evacuation of staff and visitors on site to the meeting point and instruct delegated person(s) to conduct a roll-call to ensure all site users are accounted for.
c) Assess the intensity and scale of the fire and make a judgment as to whether the fire can be managed without the requirement for assistance from the emergency services i.e. using the hose or fire extinguishers.
d) If viable and safe, instruct necessary site staff to commence extinguishment.

7.2 Out of hours fire detection

7.2.1 **Site Security and CCTV system**: It is considered arson would be the only cause of a fire outside of operating hours during to the site's strict acceptance procedures and types of waste accepted and stored. Details of the site's security infrastructure and 24-hour CCTV and intruder alarm system are outlined in Section 2.7 which are considered ample to prevent arson inform the operator of an incident.

8 Fire response procedures

8.1 Response procedure

8.1.1 Further to the above measures, the following procedure would apply:

a) Call the Fire Response Service (FRS) immediately using 999.
b) Call the EA's Emergency Contact Number.
c) Competent person to ensure suitably trained employee initiates the three penstock valves in the site's surface water drainage system shown on the Site Layout & Drainage Plan.
d) Prior to the FRS arriving, inform all neighbouring premises likely to be affected.
e) If not previously informed, senior management of the company will be informed at this point of the details, nature and extent of the fire and whether assistance from staff from other depots is required.
f) Ensure access routes are clear.
g) If safe to do so, site management will inspect the location of the fire, to identify immediate risks to surrounding premises and the FRS.
h) 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.
i) Ensure relevant site staff are standing by in a safe location to deploy additional surface water protection equipment under the direction of the FRS when they arrive (booms, etc.).
j) Site management will identify themselves to the FRS as soon as they arrive on site and will provide them with a copy of this document and update them with relevant information that will assist them in dealing with a fire more effectively.
k) Implement pollution control measures) if safe to do so.

8.1.2 In the event of site management being absent from site, the operator will ensure the TCM or a suitably competent deputy is available during operating hours to take command of an incident should one occur.

8.2 Staff/Visitor Response Procedure

8.2.1 The following actions will be undertaken by site operatives when a fire is detected or suspected on site:

a) Don't panic
b) Inform the site manager or technically competent manager immediately
c) Raise the alarm (if not done so already)
d) Do not try to tackle the fire yourself unless you are trained in doing so and you are sure of the nature of the fire
e) Leave the site using the nearest exit as quickly and as orderly as possible
f) Assemble at the specified fire assembly point
g) The site manager or delegated operative will be in charge of calling the emergency services on "999" and ensuring that all persons who were working in the building are assembled safely
h) Do not return to the site until you have been given the 'all clear' by the emergency services and/or site management / responsible person.

8.3 Evacuation of Staff (and Drill Procedure)

8.3.1 An evacuation plan has been formulated for the site and all operational staff have been made aware of it (through site induction and refresher training). The fast and effective evacuation of staff to the one of the Fire Assembly Points shown on Drawing No. RLRP/1040/03 will increase safety on site and limit the impact of a fire on any persons on site.

8.3.2 Fire drills will take place every 12 months and 1 month after site operations commence to ensure evacuation times are acceptable and that site staff remain informed of evacuation procedures. The operator will also appoint and train fire marshals on site, to aid in the above.

8.3.3 The full drill involving a dry run of the procedures involved in this document will be carried out every 12 months. The drill will be a simulation of an emergency with the location of a

mock fire notified to staff in order to test the response speed in deploying pollution control equipment i.e. including drain mats/plugs and ensure all firefighting equipment is sound. The fire check form may also be completed and a detailed report of the outcome of the exercise will be prepared to assist with staff training as stated in Section 5.2.

9 Suppressing fires & firefighting techniques

9.1 Internal suppression/alternative measures

9.1.1 Where wastes are stored inside the main storage and processing building it is considered the below measures are suitable in ensuring the three objectives of the FPP guidance are met without the need for an automated suppression system.

a) The site is largely 24 hours operational and has nearly 250 staff working at the site meaning a fire can be quickly detected and appropriate action taken to reduce the spread of fire.
b) Combustible waste stored inside the building has not undergone any form of mechanical treatment which would lead to a pile overheating.
c) All waste stored internally is clearly demarcated with 6, separation distances and not at risk from self-combustion. Deep seated (self-combusting) fires usually only occur where mixed waste has been left to stagnate for a significant length of time i.e. exceeding the limits set in the FPP guidance. All baled stack storage will be within the limits of the FPP guidance.
d) The majority of piles stored are below the limits shown in the FPP guidance in terms of height meaning a fire can be quickly accessed and not spread to exteriors compromising the integrity of the building.
e) The building has a significantly large number of access points via large roller shutter doors to remove waste at risk of combusting and all piles can be accessed for firefighting.
f) The site has access to a number of on-site suppression measures which can be deployed in the event of a fire as an immediate response following the alarm being raised and the mobilisation of appointed fire contact(s) (if safe to do so). These are described further in the section below.
g) The building is positioned at least 40m away from other receptors meaning any fire would be contained on site.

9.2 Site-wide suppression

9.2.1 The site has the following on site suppression measures which are indicatively shown on Drawing No. RLRP/1040/03:

i) 4 no. hydrants with a nominal main of >150mm
ii) A large number of 50m hose reels
iii) A large number of fire extinguishers located in close proximity to waste piles
iv) 2 no. fire engines.

10 Water supplies

10.1 General

10.1.1 Section 16 of the EA's FPP mentions the site should have enough water available for firefighting to take place and to manage a worst-case scenario. A worst-case scenario would be the largest waste pile catching fire.

10.1.2 Based on the above scenario, the largest piles measures 750m^3 at full capacity and assuming all waste in the pile is combustible would require 900,000 litres (900m^3) of water for a minimum of 3 hours which equates to 300,000 litres per hour; 5,000 litres per minute, 83 litres per second.

10.2 On-site water supply

10.2.1 The site has access to a number of on-site hoses which connect to the mains water supply which can be used for dousing any hot loads i.e. in the quarantine area or for any small fires which could break out.

10.2.2 There is also access to a number of fire extinguishers which are strategically placed around the site.

10.2.3 There are two fire engines with 1,800 litres of water in each for additional suppression to the hoses and extinguishers.

10.2.4 The site has 4 no. fire hydrants on site as shown on Drawing No. RLRP/1040/03 and no information is available in terms of their flow. Both the FRS and Water Company (United Utilities) have advised via telephone conversations that the pressure can be increased to reach the required flow; neither would confirm this in writing. The water company also advised they refuse to undertake flow tests due to discoloration to adjacent water networks and whilst an average flow gives a reading, events on the day could lead to a significant drop in flow i.e. another fire in close proximity.

10.3 Off-site water supply / fire hydrants

10.3.1 There are also a number of fire hydrants in addition to those on site which can also be utilised by the FRS.

10.3.2 As there is no readily available information in terms of the hydrants, the following guidance on water supplies for industrial estates has been referenced in order to determine an average flow:

a) Up to one hectare minimum of 20 l/sec (1200 l/min)
b) One to two hectares minimum of 35 l/sec (2100 l/min)
c) Two to three hectares minimum of 50 l/sec (3000 l/min)
d) Over three hectares minimum of 75 l/sec (4500 l/min)

10.3.3 The surrounding Longridge Industrial Estate comprises over 50 hectares which would easily exceed the required 5,000 litres per minute to ensure the fire is extinguished within 3/4 hours.

11 Managing Fire Water

11.1 Drainage

11.1.1 The drainage arrangements for the site are clearly shown on Drawing No. RLRP/1040/03 and summarised as follows:

a) All drainage from the main building's roof, access road, car parking areas and other concreted areas will all drain to interceptors and eventually discharge into the existing foul sewer system under a trade effluent consent. The entire concrete yard is sealed either by surface drains or 0.15m kerbing to prevent escape of contaminated surface water.

b) All foul drainage directly links to the foul sewer system.

c) The inside of the main building is currently surfaced entirely with impermeable concrete surfacing and access points are sealed to prevent ingress of rainwater and egress of contaminated fluids.

11.2 Containment of Fire Water (Building and External Concrete Areas)

11.2.1 The site was subject to a fire on 09/04/2015 which was successfully extinguished and all fire water drained into the foul sewer system using the existing consent which is shown in Appendix III.

11.2.2 In the event of a drainage system malfunction and the site needed to contain fire water as a secondary measure, contingency measures have been provided in the next sections.

11.2.3 It is likely the fire would occur be in one of these areas:

a) Upper yard containment

b) Lower yard containment

c) Internal / waste processing building containment

11.2.4 **Upper yard** - The upper yard would need to contain 900m^3 of water based on the largest pile and the upper yard area of the site measures approximately 16,950m^2 meaning this

area would require 0.05m containment around the perimeter. The only none sealed area is the ramp which separates the upper and lower yard so it is proposed to seal using a 0.16m fire water boom as shown on the next section.

11.2.5 **Lower yard** - As per the above this area is entirely sealed and measures approximately 18,900m^2; the largest pile is **LY8** requiring 540m^3 of water to extinguish and therefore requiring 0.02m containment. The kerb height of 0.15m would mean water could be easily contained in the lower yard.

11.2.6 **Building** - The building is entirely sealed and measures approximately 15,165m^2; the largest pile is **INT3** requiring 540m^3 of water to extinguish and therefore requiring 0.04m containment. The building has concrete bases to the floor and all access points are bunded with a concrete ramp at least 0.05m; therefore, could contain all water.

11.2.7 The above has been based on closing interceptors and plugging drains using drain plugs and penstock valves to create a pond/lagoon on site as all areas a relatively flat with a gradual fall to gullies. This has not been demonstrated on Drawing No. RLRP/1040/03.

11.2.8 **Fire water booms** - The fire water booms will be industry approved and consist of the same product as those issued to the FRS by the EA in their grab packs which all appliances now have. The firewater booms come in 100m rolls so can be cut to the required 70m length required for this site.

11.2.9 **Using the boom - the boom is used as follows:**

- Unroll the boom and seal one end with either an overhand knot or by using cable ties provided.
- Position boom and fill two large outer compartments with water from a hose reel.
- Seal open end with second cable tie.

11.2.10 An example of the boom is shown overleaf referenced as (f) extracted from the EA grab back.

Figure 1 – Contents of the Environmental Agency Grab Pack

Component parts

a. Grab Pack bag (empty)
b Ready-Mixed clay sealing putty
c Clay Drain Mat
d. Disposable Gloves
e. Absorbent Pads
f. Polyboom
g. Plastic Waste Bags
h. Cable Ties
i. Environment Agency warning tape
j. Laminated Instruction Sheet (not shown)
k. Clay Equipment Resistance table (not shown)
l. Laminated guide for waste disposal responsibilities (not shown)

11.2.11 If there is any deviation from the above drainage arrangement, an amended FPP will be submitted for approval by the EA and FRS.

11.3 Removal of fire water

11.3.1 The operator has a discharge consent / trade effluent agreement as shown in Appendix III to discharge fire water into foul sewer via the sites sealed drainage system. This is also demonstrated in the Fire Incident Report shown in Appendix IV which was produced by Recycling Lives Ltd.

12 During and after an incident

12.1 Notifying nearby properties

12.1.1 The nearest receptors within 200m of the site i.e. other users of the Industrial Estate will be informed of the fire by employees of the operator by phone or foot and the FRS, Local Council and EA will be contacted to ensure further properties are informed should the fire become problematic i.e. local business, houses

12.2 Contingency Planning

12.2.1 In the event of a fire the site will cease accepting waste. All customers who wish to deliver wastes during a fire will be notified by site admin staff and any who arrive without prior notification will be turned away. If urgent, deliveries will be directed to an alternative waste facility in the borough; details of which can be found on the EA's public register.

12.2.2 No waste will be accepted on site until the post-fire site recovery procedures outlined in below have been fully implemented and the site is authorised to re-open for trade and waste acceptance.

12.3 Post Fire Site Recovery

12.3.1 If a recovery procedure is required, Recycling Lives Ltd would instigate the following;

a) Remove damaged material to a permitted facility that is able to deal with it legally.
b) Ask engineers to carry out repairs on any plant, vehicles and/or infrastructure.
c) Assist the FRS with the fire investigation and where necessary engage the advice from a professional fire consultant.
d) Review the FPP and EMS procedures and improve upon where found deficient.
e) Review training requirements for staff.
f) Assess whether further preventative measure could be implemented.
g) Ensure all fire equipment, where used, is replenished.
h) Remove fire water to a permitted facility for disposal.

Appendix I

Drawings

Key:

- Permit boundary
- Waste storage areas
- Non-waste storage areas
- Fuel / oil storage
- Waste recycling / storage buildings
- Other buildings i.e. workshops/offices
- Impermeable concrete surfaces with sealed drainage (upper level)
- Impermeable concrete surfaces with sealed drainage (lower level)
- Unsurfaced / landscaped areas
- Foul drainage
- Surface water drainage
- Manholes
- Gullies
- 600mm - 800mm legio block walls
- 150mm - 500mm concrete panel walls
- Quarantine areas (with 6m buffer zone)
- Hot works area (indicative)
- Hose reels
- Fire fighting equipment (extinguishers, etc.)
- Plant shutoff (indicative)
- Fire alarms (indicative)
- Spill kits
- Designated smoking area
- Access route for emergency services
- On site fire hydrants
- Fire assembly points

Def Co Const, ED Boro Const Bdy

6m high concrete panel wall with 3m high dust netting

6m concrete panel wall

Enclosed shredder

Loading conveyor

UY10 - Shredded ferrous metal & ELVs

UY9 - Shredded ferrous metal & ELVs

UY8 - Ferrous metal & baled (depolluted) ELVs

UY7 - Ferrous metal & baled (depolluted) ELVs

UY6 - Ferrous metal & baled (depolluted) ELVs

UY5 - Ferrous metal & baled (depolluted) ELVs

UY4 - Ferrous metal / baled ELVs

UY3 - Ferrous metal

UY2 - Mixed scrap metal

UY1 - LPG tank storage

6m

Container tilter

Control tower

Substation, control panel, motor and hydraulics building

Open top shredder building (approx. 13m high)

20m diameter / 300m² / 400m³ quarantine area

UY25 - 27 Undepolluted ELV storage

UPPER YARD

Conveyor

Roller drum magnetic housing

UY11 - Fragmentiser fluff

UY12 - Non-hazardous (NH) WEEE

UY17 - NH WEEE

Z Box and air cyclone system (approx. 13.75m high)

Magnetic separation system inc. eddy current

Picking shed

Bag house

Conveyor

UY13 & 14 ferrous metal

UY15 & 16 Non-ferrous metal

Radial stacker conveyor (enclosed)

UY18 - 21 Non-ferrous metal

Fire engine

Lower level approx. 1.5m lower than upper level

SDA WEEE Processing area

Rotation device (container tilter)

LY8 - Fragmentiser fluff

LY7 - Fragmentiser fluff

Conveyor discharge (approx 9m high)

Depollution building inc. 4 no. ramps

UY23 batteries

Exports building (non-waste)

UY22 - Hazardous WEEE (fridges)

UY24 batteries

Interceptor

A-block concrete barriers to shield fuel tanks

Fuel store

Depollution office

Baler

LY1 - Non-ferrous metal

LY2 - Fragmentiser wire

LY3 & 4 - Mixed scrap metal

Baling area

LY5 - Plastic bales

LY6 - Ferrous metal

Baler feed

Dust monitor 2 (indicative)

LOWER YARD

Conveyor

Roller shutter door

Roller shutter door

Trommel

Residual non-waste

Non-waste general storage

2 no. container tilters (loaders)

Degassing building

Roller shutter door

3m concrete post and steel wire fence topped with barbed wire

ESS

Fire engine

3 no. conveyors discharging to fines / non-ferrous washing/processing plant

Temporary storage of FPDs prior to processing

Non-waste general storage

Staff / visitor parking

Non-waste storage and power supply

Roller shutter door

Weighbridge office

Washing plant

Fragmentiser waste sorting plant

WBs

Cable/wire granulation area

Proposed LCD/FPD disassembly / shredding line

Refer to RLRP-1040-K_Part_2 for process

Staff / visitor parking

Infra red sensor

2 no. weighbridge's (in/out)

Roller shutter door

Staff / visitor parking

INT 4 - Hazardous WEEE

INT 3 - Tyres

INT1 - Hazardous WEEE

INT2 - Hazardous WEEE

PPE storage bays (non-waste)

Fuel store for vehicles / plant

Paint spraying workshop

LY9 & 10 Non-ferrous metal

Roller shutter door

Mechanics / maintenance building

Mechanics / maintenance building

Manual cutting / dismantling area for WEEE (partitioned)

Roller shutter door

Workshop

Welding building (hot works)

Workshop

INT 5 - Catalytic convertor storage

Raw 2K storage (non-waste)

INT 6 - Tyres

INT 8 - Non-ferrous metal despatch area

Platform scales

INT 7 - Non-ferrous metal

Use of bay TBC

Offices / welfare

Smoking area

Office

Granulating equipment

Offices / welfare

Caged gas bottles

Car parking for directors

Weighbridge

WB

RAW 2K (auction) vehicle storage - non waste

Security office

Security office

General storage area i.e artic trailers / wagons etc.. (non-waste)

Interceptor

Site access / egress

Landscaping / vegetation

Interceptor

Discharge to foul sewer - Reference: 716T2-1-444

3m concrete post and steel wire fence topped with barbed wire

2.5m steel sheeted fence + 3m concrete posts with barb wire

Scale Bar (1:500)

0 m 25 m 50 m

Rev	Description	Date
-	Initial drawing	26/09/18

Notes:

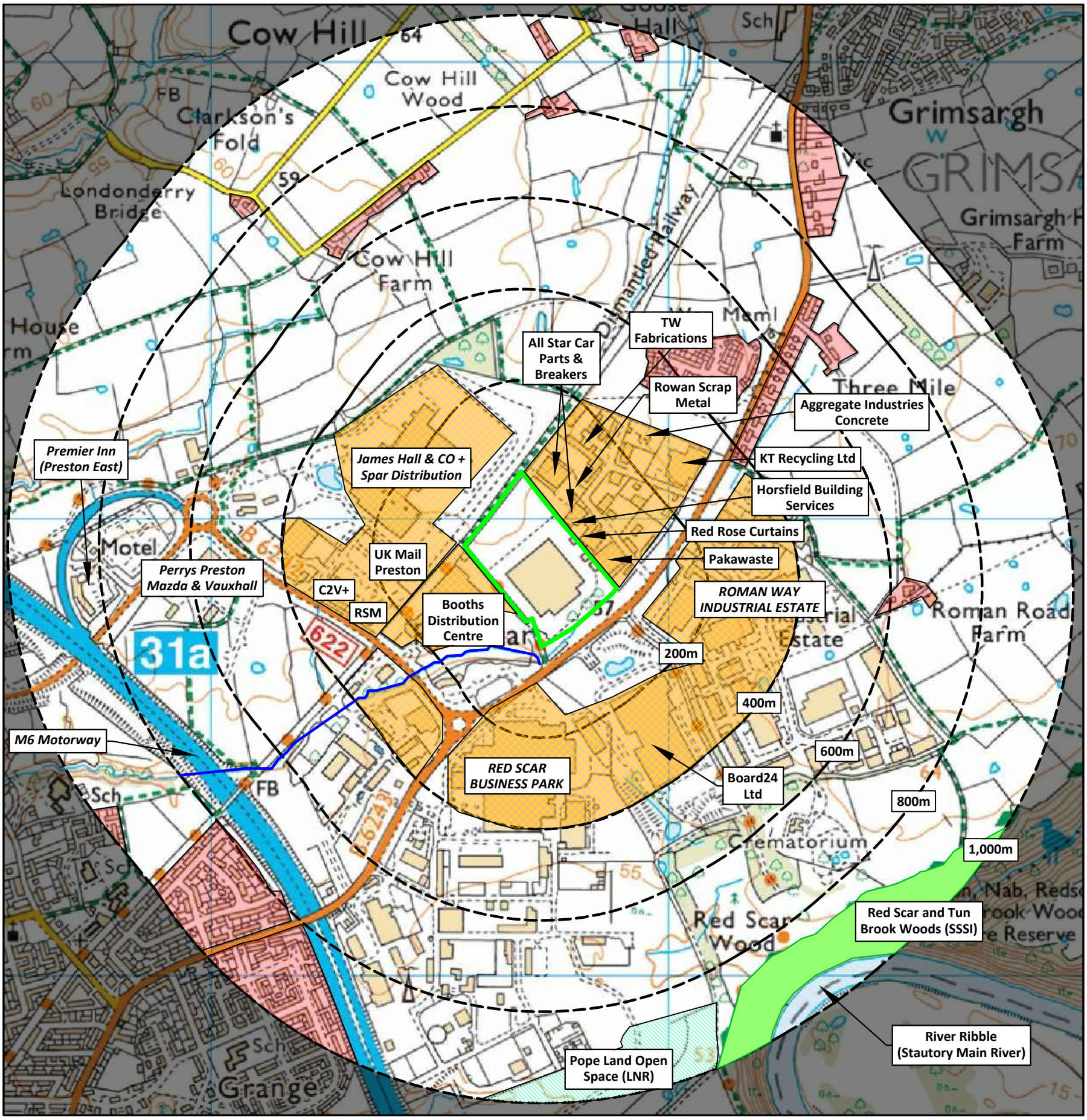
1. Drawing for indication only.
2. All measurements must be verified on site.

Oaktree Environmental Ltd
Waste Management and Environmental Consultants
Lime House, Road Two
Winsford Industrial Estate
Winsford, Cheshire CW7 3QZ
Tel: 01606 558833
E-mail: sales@oaktree-environmental.co.uk

Title:	SITE LAYOUT & FIRE PLAN
Drawing No:	RLRP/1040/03
Client:	Recycling Lives Ltd
Site:	Longridge Road, Preston, Lancashire PR2 5BX
Date:	1 May 2019
Printed At:	A1
Scale:	1:500
Revision:	-
Drawn By:	CP
Checked:	RLL
Job No:	4028
Client No:	1040

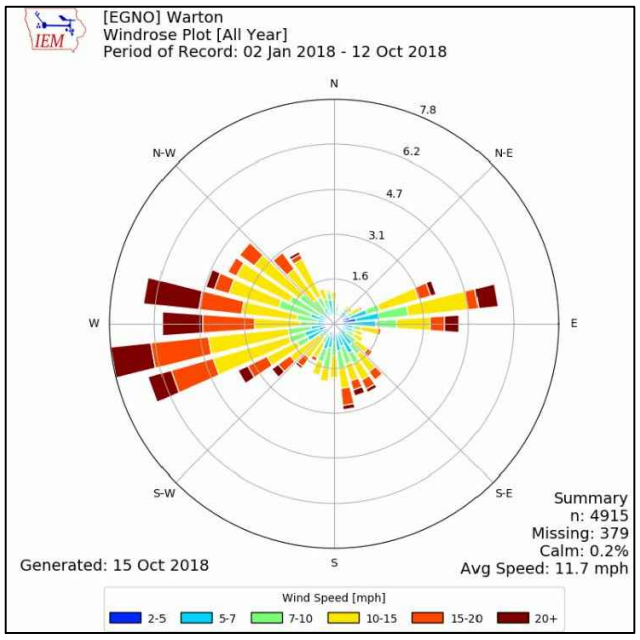
Scale Bar (1:10,000)

0 m 100 200 300 400 500 m



KEY:

- Permit boundary
- Statutory Main River (Savick Brook)
- Watercourse i.e. ditch, stream, river
- Watercourse i.e. pond, lake etc.
- Workplaces (includes agriculture industry, commerce and retail)
- Industrial/commerical properties within 400m of the site
- Residential receptors
- Class A, B, C roads
- Railway line
- Wooded areas
- Public footpath



Compass Wind Rose for Warton (EGNO)
02/01/2018 - 12/10/2018

Oaktree Environmental Ltd

Waste Management and Environmental Consultants

Lime House, 2 Road Two
Winsford Industrial Estate
Winsford, Cheshire CW7 3QZ

Tel: 01606 558833
E-mail: sales@oaktree-environmental.co.uk

Client: Recycling Lives Ltd			
Site: Recycling Lives Recycling Park Longridge Road, Preston, Lancashire PR2 5BX			
Date: 2 May 2019			Printed At: A3
Title: SENSITIVE RECEPTORS PLAN	Scale: 1:10,000	Revision: -	Drawn By: CP
Drawing No: RLRP/1040/04	Client No: 1040	Job No: 4028	Checked: --

Notes:

(1) Boundaries are shown indicatively.
(2) Wind rose data shows the prevailing wind direction to be W.

Revision Details:

Rev:	Description:	Date:
-	Initial drawing	02/05/19

Appendix II

Record Keeping Forms

RECYCLING LIVES LTD
SITE INSPECTION FORM (DAILY INSPECTIONS) – RLL/RF/4

WEEK STARTING								
TYPE OF INSPECTION		DAY						
		M	T	W	T	F	S	S
SITE ENTRANCE/NOTICE BOARD								
SECURITY - GATES								
SECURITY - FENCING								
SITE ROADS (CLEAR FROM HAZARDS)								
SITE SURFACES CLEAR OF OIL								
IMPERMEABLE CONCRETE AREAS (INTEGRITY)								
EXTERNAL SEALED DRAINAGE SYSTEM (INTEGRITY)								
INTERNAL SEALED DRAINAGE SYSTEM (INTEGRITY)								
INTERCEPTORS								
WASTE CONTAINERS & BAY WALLS								
WASTE STORAGE LIMITS	EXTERNAL - UPPER YARD							
WASTE STORAGE LIMITS	EXTERNAL - LOWER YARD							
WASTE STORAGE LIMITS	INTERNAL							
COMBUSTIBLE WASTES (AWAY FROM POTENTIAL IGNITION SOURCES)								
REJECTED WASTE TYPES / STORAGE								
NOISE LEVELS								
FIRES (ANY INCIDENTS REPORTED)								
QUARANTINE AREA CLEAR OF WASTE								
NO SMOKING SIGNS IN PLACE								
FIRE FIGHTING EQUIPMENT								
FIRE BREAKS IMPLEMENTED								
PLANT/EQUIPMENT MAINTENANCE CHECKS								
HOT EXHAUSTS FIRE WATCH (DUST/FLUFF CLEANED REMOVED)								
OFFICE/WELFARE FIRE RISKS CHECKED								
ELECTRICAL APPLIANCES AND CABLING CHECK								
FUEL TANKS/BUND								
LITTER								
DUST								
ODOUR								
VERMIN								
RECORDS								
COMPLAINTS RECEIVED								
OTHER (SEE NOTES BELOW)								
INSPECTION CARRIED OUT BY								

NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
Sheet		***of***	

Appendix III

Trade Effluent Agreement

Recycling Lives Limited

Recycling Lives Centre
Essex Street
Preston
PR1 1QE

Thirlmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone 01925 234000
www.unitedutilities.com
RCTE: P Jones
Direct Line: 01925 674244

Date: 9 April 2013

FAO The Company Secretary

Dear Sir

TRADE EFFLUENT – WATER INDUSTRY ACT 1991 - Longridge Road Preston Lancashire PR2 5AR

Further to your TRADE EFFLUENT NOTICE dated 6 March 2013, I enclose your CONSENT TO THE DISCHARGE OF TRADE EFFLUENT.

This document is issued by virtue of Statutory Powers granted by the Water Industry Act 1991 and as such a “true copy” has now been placed on public record. The Consent to Discharge relates solely to the trade effluent described in your Trade Effluent Notice and you must notify United Utilities Water PLC of:

a) any proposed changes to the nature and composition of the effluent;

b) any proposed changes to the rate of discharge and/or daily volume;

c) any proposed change of name of your Company (or trading name);

d) permanent termination of the discharge

The conditions laid down in the Consent are the only conditions under which United Utilities Water PLC will undertake to receive your effluent into the foul sewer. Any failure to comply with such conditions is an offence under the Water Industry Act 1991.

In accordance with our Charges Scheme, an application fee of £**378** is now payable for this Consent. An invoice will be sent to you shortly.

In respect of clause 10a) of the Consent, I understand that representative samples of the trade effluent may be obtained from manhole after the interceptors marked 'x' on the plans. You should note that officers designated in writing by United Utilities Water PLC shall have right of safe access at all reasonable hours without notice for the purpose of obtaining a sample of trade effluent.

The volume of trade effluent can be determined by;

Site area of 26,550m2 (as agreed) x average rainfall

It will not be necessary for you to install additional apparatus to measure the trade effluent as required by clause 10b) of the Consent. If circumstances change I will write to you again revoking this exemption.

Yours faithfully

Wastewater Catchment Manager
Wastewater Services

WATER INDUSTRY ACT 1991

CONSENT TO THE DISCHARGE OF TRADE EFFLUENT

Whereas **Recycling Lives Limited**

(hereinafter called "the Trader") whose Head Office or Registered Office is at

Recycling Lives Centre Essex Street Preston PR1 1QE

Is the **owner/occupier** of the trade premises at:

Longridge Road
Preston
Lancashire
PR2 5AR

and by the Trade Effluent Notice dated **6 March 2013**

Have applied to UNITED UTILITIES WATER PLC (hereinafter called "the Company") for consent to discharge trade effluent from the said trade premises into the sewers.

Under the provisions of the above mentioned Act the discharge of trade effluent in accordance with the said Trade Effluent Notice would not be lawful without the consent of the Company.

NOW THEREFORE in exercise of the powers conferred upon them by the above Act the Company HEREBY CONSENT to the discharge of trade effluent by the Trader from the said premises into their sewers SUBJECT TO THE FOLLOWING CONDITIONS:

Nature of discharge

1a) Subject to the provisions of conditions 6,7,8 and 9 below the nature or composition of the trade effluent to be discharged under this Consent shall be solely as specified in the said Trade Effluent Notice and shall consist solely of waste water derived from **vehicle wash and contaminated site run off.**

1b) The trader shall give to the Company prior written notice of any change in the process or the process materials or any other circumstances likely to alter the constituents of the trade effluent as set out in condition 1(a). In such circumstances, no substance of which the Company has not had previous notice, may be discharged unless and until the Company has agreed to accept the substance at a limit imposed by the Company which shall then be deemed to be incorporated in this Consent by agreement and shall not prejudice the right of the Company to serve a Direction earlier than two years from the date of such incorporation.

The Trader shall also give not less than seven days written notice to the Company of any change in the name of the occupier or owner.

Sewer affected

2. The sewer into which the trade effluent may be discharged and the point of discharge is the foul sewer situate at **Longridge Road (MH 8706)**.

Connections

3. No connections shall be made to the said sewer without the prior approval of the Company and all such connections shall be constructed and maintained to the satisfaction of the Company at the expense of the Trader.

Maximum volume of discharge

4. The maximum amount of the trade effluent discharged in any one day of twenty four hours shall not exceed **1,331** m^3 without prior written consent of the Company.

Maximum rate of discharge

5. The highest rate at which the trade effluent may be discharged shall not exceed **16** litre/sec.

Matters to be eliminated prior to discharge to sewers

6. The following matters shall be eliminated from the trade effluent before it is discharged into the sewers of the Company:

a) petroleum spirit;

b) calcium carbide;

c) carbon disulphide;

d) except as provided in paragraph 7 hereof, the prescribed substances listed in Schedule 1 to The Trade Effluents (Prescribed Processes and Substances) Regulations 1989, as amended from time to time, insofar as they are in concentration greater than the background concentration (as defined in the said Regulations);

e) where the trade effluent derives from a prescribed process mentioned in Schedule 2 to the said Regulations, and except as provided in paragraph 7 hereof, asbestos (as defined in the said Regulations) and chloroform in concentration greater than the background concentration (as defined in the said Regulations);

f) organo-halogen compounds including pesticide residues and degreasing agents;

g) any substances which either alone or in combination with each other or with any other matter lawfully present in the said sewers would be likely to;

i) cause a nuisance or produce flammable, harmful or toxic vapours either in the sewers or at the sewage works of the Company;

ii) injure the sewers or interfere with the free flow of their contents or affect prejudicially the treatment and disposal of their contents or have injurious effects on the sewage treatment works to which it is conveyed or upon any treatment plant there;

iii) be dangerous to or cause injury to any person working in the sewers or at the sewage treatment works;

iv) affect prejudicially any watercourse, estuary or coastal water into which the treated effluent will eventually be discharged.

Matters to be limited prior to discharge to sewer

7. The trade effluent shall not contain

a) Cyanides and cyanogen compounds which produce hydrogen cyanide on acidification in excess of 1 mg/l

b) Separable grease and oil in excess of 100mg/l

c) Sulphates as SO_4 in excess of 1,000 mg/l

d) Sulphides, hydrosulphides, polysulphides and substances producing hydrogen sulphide on acidification in excess of 1 mg/l

e) Total suspended solids at pH 7.0 and dried at 110º C in excess of 1,000 mg/l

f) Toxic metals in excess of 10,000 ug/l either individually or in total ie Antimony, Beryllium, Chromium, Copper, Lead, Nickel, Selenium, Silver, Tin, Vanadium, Zinc;

Temperature

8. No trade effluent shall be discharged which has a temperature higher than 43.3°C (110°F).

pH value

9. No trade effluent shall be discharged having a pH of less than **6** or greater than **10**

Inspection Chamber

10. a) An inspection chamber or manhole shall be provided and maintained by the Trader in a suitable position in connection with each pipe through which the trade effluent is discharged and shall be so constructed and maintained as to enable a person readily to obtain at any time samples of the trade effluent so discharged, to the approval of the Company.

b) Suitable apparatus for measuring and automatically recording the volume and composition of trade effluent discharged shall be provided and maintained in working order by the Trader in connection with every such pipe, unless otherwise exempted in writing by the Company.

c) If the measuring and recording apparatus as aforesaid ceases to function satisfactorily, then the Company shall have the right to make estimates of the volume and composition of the trade effluent until such time as the said apparatus is again operating to the satisfaction of the Company.

d) Records shall be kept by the Trader of the volume, rate of discharge, nature and composition of the trade effluent discharged to the sewer, together with any records required to be kept by the Trader under the provisions of any Notice of Determination issued by the Secretary of State under Sections 120 and 132 of the Water Industry Act 1991. Such records shall be kept available for inspection at all reasonable times by an authorised officer of the Company and copies shall be sent to the Company on demand.

e) The foregoing provision of this condition shall be deemed to be complied with if other methods of sampling the trade effluent, determining its nature and composition, and measuring and recording the discharge are agreed and confirmed in writing by the Company.

Payment

11. Payment shall be made to the Company on demand of charges in respect of the reception, conveyance, treatment and disposal of the trade effluent in accordance with the Company's Charges Scheme in force from time to time.

Dated 9 April 2013

Issuing Office

Wastewater Services
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington
WA5 3LP

Signed

WASTEWATER CATCHMENT MANAGER
for and on behalf of United Utilities Water PLC

Your attention is drawn to Section 122 of the Water Industry Act 1991 which provides that any person aggrieved by any conditions attached to this Consent may appeal to the Director General of Water Services.

Appendix IV

Fire Incident Report
Recycling Lives Ltd

Incident Report

Premises Name	Recycling Lives Recycling Park.
Address	Longridge Road, Preston, Lancashire, PR2 5BX
Incident Date	Sunday 27 January 2019
Author	Dave Gallagher, Head of Safety & Compliance

References:

A. Fire Risk Assessment, Recycling Lives Recycling Park, author Matthew Chenery, dated September 2018
B. DRAFT Fire Prevention Plan, Recycling Lives Recycling Park, prepared by Oaktree Environmental Consultants v1.3 dated 5 December 2018 *[pending Environment Agency Feedback]*
C. EAP009 Accident, Incident and Environmental Incident Management Plan latest revision dated 6 Dec 2018

1.0 Incident Overview

At around 0100hrs on the morning of Sunday 27 January 2019 a fire broke out within a storage area of end of life vehicles on the Top Yard of Recycling Lives Recycling Park (RLRP). The fire broke out in wet, windy conditions and the storage area contained around 150 end of life vehicles at the time. CCTV evidence shows that the source of ignition was a car within the middle of the stack.

The alarm was raised, and Lancashire Fire and Rescue Service attended, supported by operational staff from Recycling Lives. Recycling Lives staff worked with the fire service personnel to contain and extinguish the fire. The fire was extinguished at around 0400hrs.

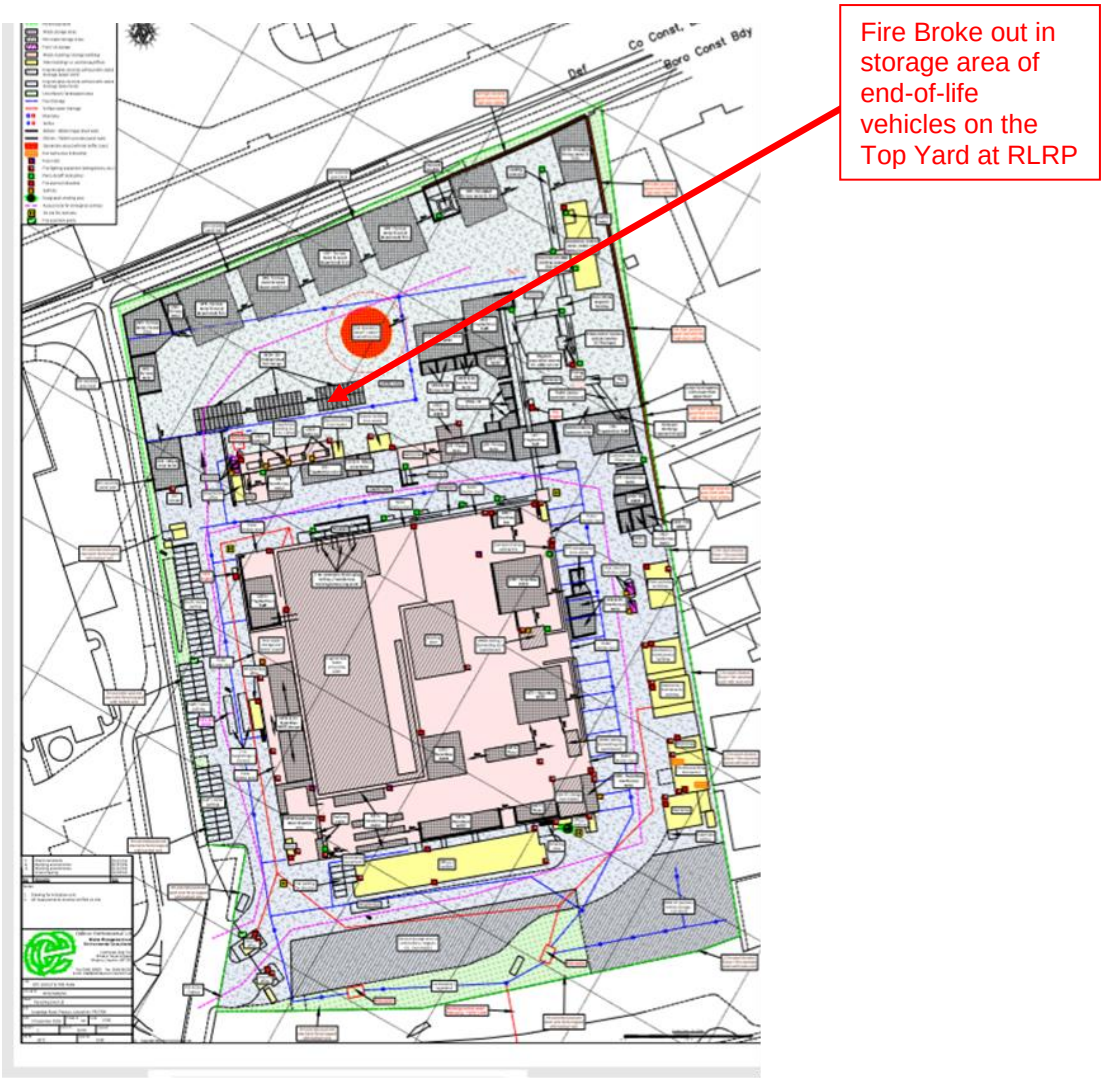
There were no injuries and no damage caused to plant or critical infrastructure. Some damage was done to concrete surfaces where the cars were sited. RLRP continued with normal operations on Monday 29 January, with repairs to the yard concrete commenced on the same day.

2.0 Incident Timeline

Time	Event
0050hrs Sunday 27 January 2019	First signs of smoke emitted by car in the storage area visible on CCTV footage
0055hrs	First signs of flame visible on CCTV footage
0106hrs	Emergency 999 call made. It is believed the alarm was raised independently by three separate sources: 1. Security staff member (Fiona Weir) from neighbouring Booths Distribution Centre – made the initial 999 call 2. CCTV Monitoring Station 3. Night Shift Operational Staff working the Granulator Plant within the downstream
0109hrs	Keyplus Mobile Security Patrol Arrived on Site
0113hrs	Graeme Slater (Facilities Manager and Keyholder) received call from Monitoring Station
0113hrs	First Fire Officer arrives at site
0115hrs	First 2 x Fire Appliances arrive at site
Around 0400hrs	Fire Extinguished
Sunday 28 January 2019	External Relationship Management and Site Clean-up, Normal Maintenance Operations continue on site

3.0 Fire Location

Plan Sourced from Reference B DRAFT Fire Prevention Plan



4.0 Source of Ignition

The incident remains under investigation by Lancashire Fire and Rescue Services and this report reflects the findings of an internal investigation undertaken by Recycling Lives Ltd.

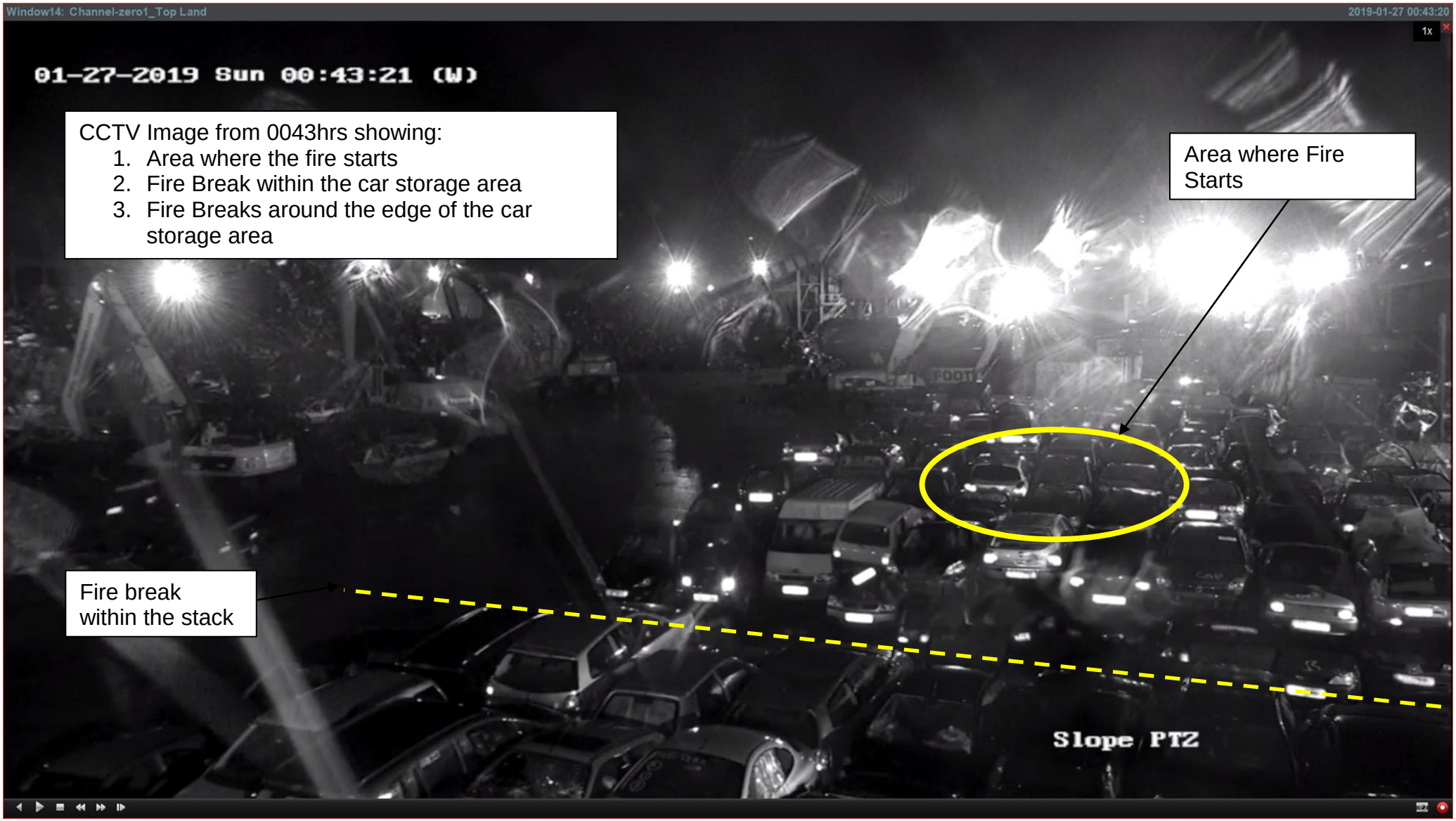
CCTV evidence shows the following:

- At 0043hrs, there are no apparent disturbances in the storage area. There is rain on the lens of the CCTV camera (Slope PTZ) facing the stack of cars. There is no evidence of other activity on site. There is a 6m fire break in place 1 x row in front of the area where the fire appears to start.
- At 0050hrs the first signs of smoke are visible from a car in the centre of the storage area.
- At 0055hrs flames are visible on CCTV.

The most likely source of ignition is considered to be an electrical or battery fault in one of the un-depolluted cars. It is possible that the weather may have contributed – the wind was a strong North Westerly and may have disturbed one of the cars.

All cars in the storage area were destroyed by the fire making further investigation into the exact source of ignition impossible.

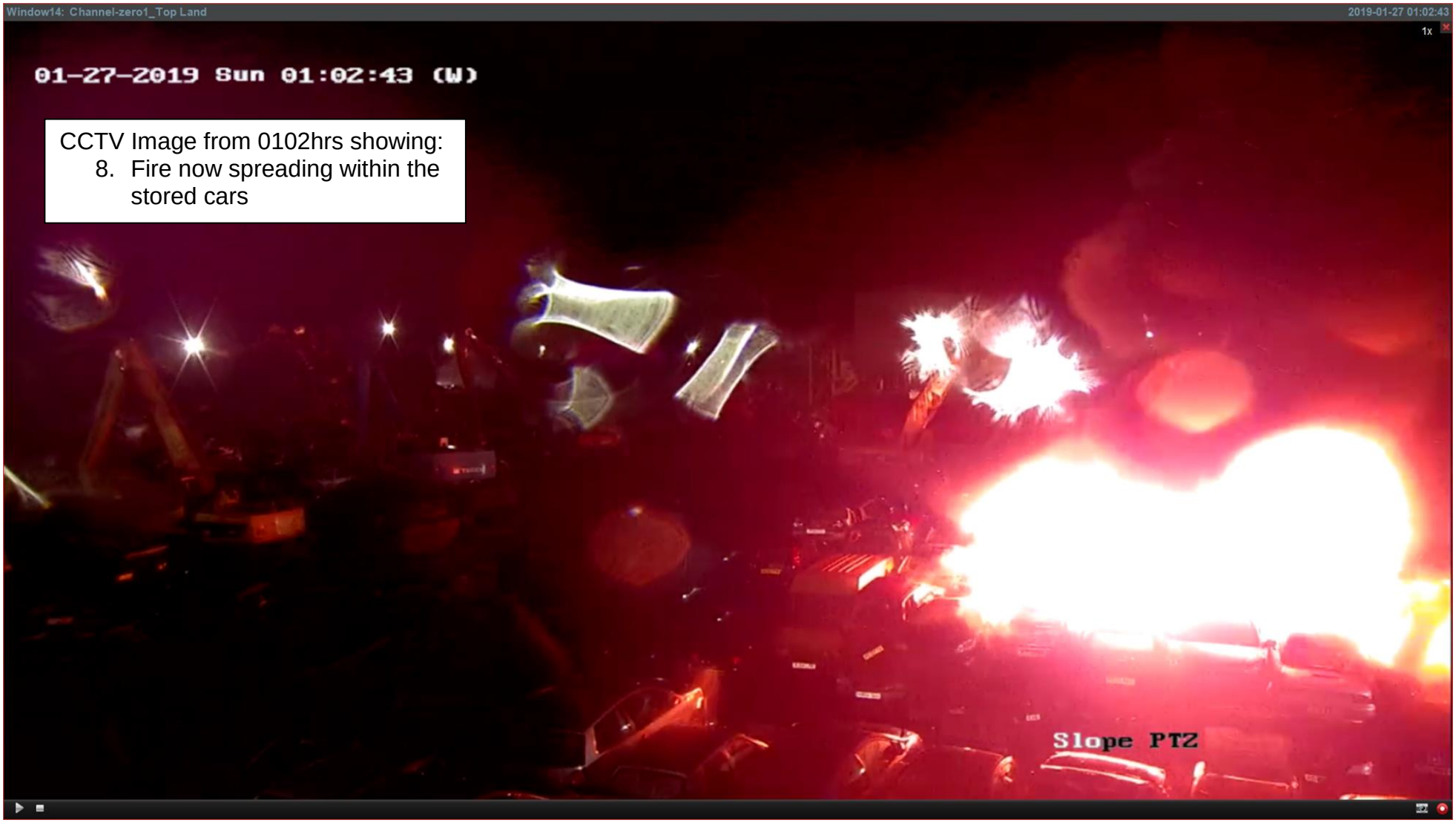
Incident Report



Incident Report

Incident Report

Incident Report



5.0 Incident Response

- The first 999 call was made by at 0106hrs by a security guard the neighbouring Booths Distribution Centre. The alarm was also raised by Night Shift Staff working in the Downstream area, and by the Alarm Monitoring Station.
- The nominated keyholder, Graeme Slater, received the first call from the Alarm monitoring station at 0113hrs, by which time the Fire Brigade were already on the way to site.
- Graeme notified Danny Jackson (Operations Director) who set off for site immediately, and a number of other staff were also telephoned and came to site to operate machinery and support the Fire Brigade.

The full investigation report from Lancashire Fire and Rescue Service is awaited, but the following statement was listed on the Fire Service social media (Facebook):

"When we first arrived we were faced with a significant fire - estimated probably about 100-150 cars involved, which was creating a huge smoke plume and creating issues with access onto the site. Obviously the smoke plume was affecting the local area. What we managed to do was get resources here very quickly, get into some good water supplies locally and we started having a really significant impact on the fire itself. In doing so ***we've worked with the site operators, there's been cranes working with us with grabbers on, moving cars out of the way, creating fire breaks. That's allowed us to contain the fire and make sure it's not spread to any adjoining buildings. We've managed to reduce the amount of impact on site. We've also reduced the impact on the environment, in creating fire breaks. We've used a lot of water but that will be contained on site - there's an interceptor system. The environmental impact has been managed****."*

- Operations Executive Members were informed between 0800-0830hrs on Sunday 27 January 2019
- By this time the key external stakeholders had been informed, including:
  - Environment Agency
  - United Utilities
  - Recycling Lives External Relations
- Contractors had also been ordered to:
  - Empty final chamber of drainage interceptors
  - Undertake repairs to fire-damage concrete surfaces
  - Roadsweep the site to collect final fire run-off mud/water/debris

In sum, the control measures detailed in the Site Fire Prevention Plan (Reference B) were in place prior to the incident, the emergency response was good and the fire was controlled and extinguished with no casualties and with damage minimised.

6.0 External Stakeholder Management

6.1 Lancashire Fire & Rescue Service:

- Attended the incident and fought the fire.
- Emergency phase was closed and handed over to Graeme Slater at 0930hrs using the Incident Handover Form.
- Issued the statement in Section 5.0 above via social media.
- Further contact is expected from the Fire Service to conclude investigations over the coming days.

6.2 Environment Agency:

- Notified by Graeme Slater on the EA National Incident Line at 0500hrs
- Rupert Denye, Environment Officer attended site at 1400hrs and inspected external water courses, confirming the Graeme Slater that no evidence of fire run off pollution was evident.
- 2 x officers visited RLRP Monday 28 Jan 19 at around 1030hrs to discuss the incident with Gary Halpin (Site TCM).

6.3 United Utilities

- Notified by Graeme Slater on the United Utilities incident line around 0600hrs.
- Attended site to inspect water being emitted from interceptors to check no pollutants and confirmed verbally to Graeme Slater that there were no concerns and run-off water could be discharged.

6.4 External Media – response managed by Katie Upton – Head of Marketing

- Social Media statements issued from 0730hrs Sunday 27 Jan 19
- BBC North West Tonight reporter attended site at 1100hrs at was escorted by Dave Gallagher and Graeme Slater to take video footage of clean-up operations and undertake a short camera interview with Dave Gallagher which featured in the evening news reports.
- Lancashire Evening Post photographer attended 1300hrs and was escorted by Dave Gallagher to take photographs of the clean-up operation.

6.5 Police CID – attended site briefly on the morning of Sunday 27 Jan 19 and reported to the Fire Brigade Incident Commander. No further contact.

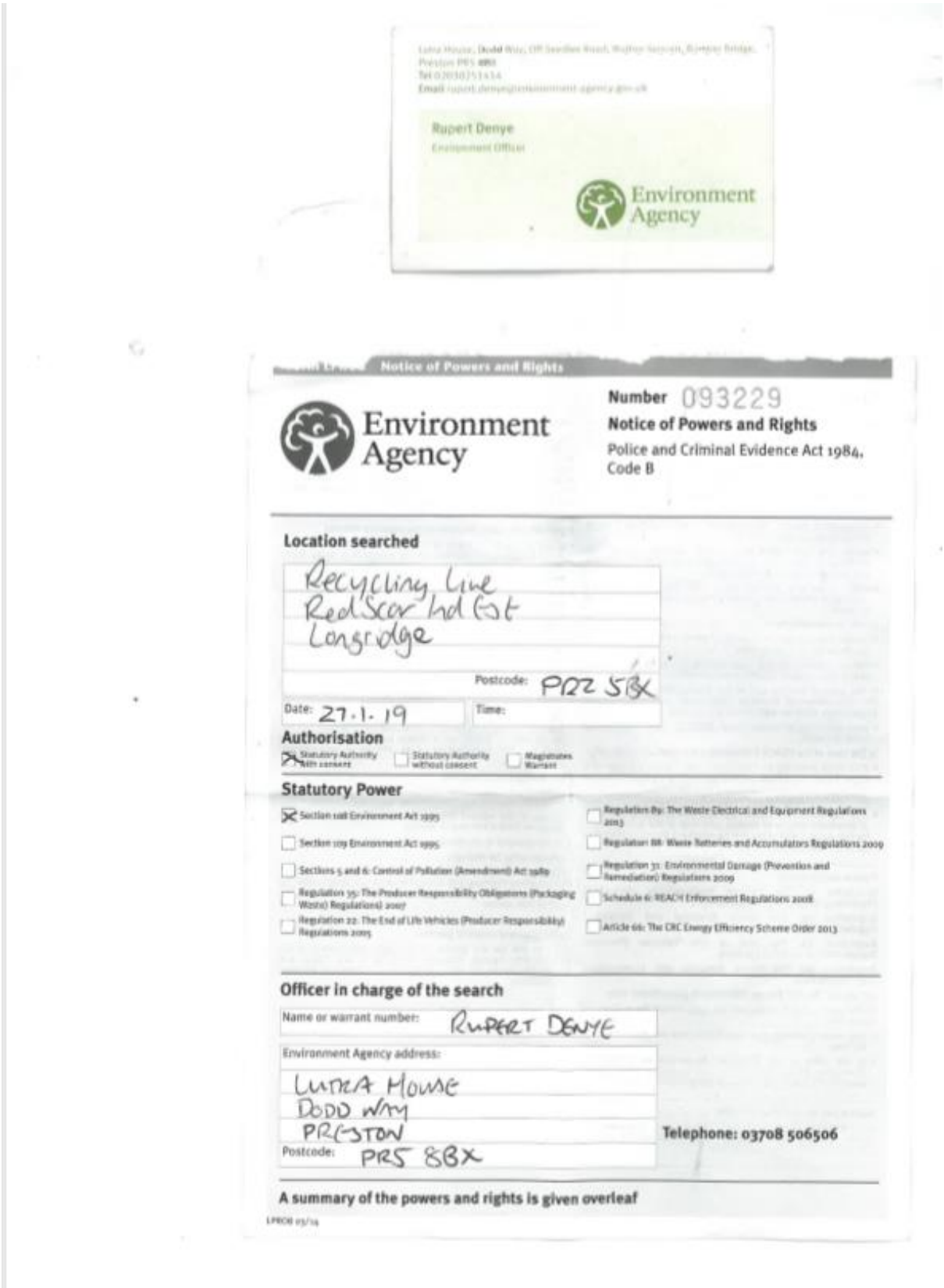
7.0 Opportunities for Improvement

- Revised operational procedures have been implemented to ensure all batteries are removed from end-of-life vehicles as soon as they arrive on site. These procedures have been verbally briefed to all ELV processing sites and will be documented as a Safe Working Procedure over the coming days. **Although we cannot unequivocally confirm that the source of the fire was faulty electrics, this measure will significantly reduce the risk of fires within stocks of end of life vehicles.**
- Fire Risk Assessment, Fire Prevention Plan and Accident & Environmental Incident Plans have been reviewed in light of the incident and are considered fit for purpose.
- The Lancashire Fire and Rescue Service Incident Commander gave good feedback on the Fire Breaks that were in place between stock piles of ELVs and metal at RLRP.
- Based on Fire Service Advice given at the time of the incident to Danny Jackson and Graeme Slater, enhance concrete barrier protection has been installed to the fuel tanks in the depollution area to provide improved heat/fire shielding.
- Incident Plans for satellite sites to be reviewed by the Compliance Team to ensure access to similar Plant Operator resource in the event of an out-of-hours emergency at other sites, and evidence form this incident to be incorporated in future emergency training for other sites.

8.0 Summary

- A fire broke out at RLRP in a storage area for end of life vehicles at around 0100hrs on Sunday 27 January 2019.
- Emergency Response plans worked effectively and collaboration between Recycling Lives staff and Lancashire Fire and Rescue Services enabled the fire to be brought under control and extinguished.
- There were no injuries and no damage to critical plant and equipment.
- Some concrete repairs have been necessary to fire damaged concrete to ensure the integrity of the top yard impermeable surface.
- Opportunities for improvement have been identified to reduce the likelihood and impact of a future fire.

Appendix 1 – EA Visit Confirmation Sunday 27 Jan



Rupert Denye

Environment Agency

Notice of Powers and Rights

Environment Agency

Number 093229

Notice of Powers and Rights

Police and Criminal Evidence Act 1984, Code B

Location searched

Recycling Line
Red Scar Ind Est
Longridge

Postcode: PR2 5BX

Date: 27.1.19 Time:

Authorisation

☒ Statutory Authority with consent ☐ Statutory Authority without consent ☐ Magistrates Warrant

Statutory Power

☒ Section 108 Environment Act 1995

☐ Section 109 Environment Act 1995

☐ Sections 5 and 6: Control of Pollution (Amendment) Act 1989

☐ Regulation 35: The Producer Responsibility Obligations (Packaging Waste) Regulations 2007

☐ Regulation 22: The End of Life Vehicles (Producer Responsibility) Regulations 2005

☐ Regulation 8b: The Waste Electrical and Equipment Regulations 2013

☐ Regulation 88: Waste Batteries and Accumulators Regulations 2009

☐ Regulation 31: Environmental Damage (Prevention and Remediation) Regulations 2009

☐ Schedule 6: REACH Enforcement Regulations 2008

☐ Article 66: The CRC Energy Efficiency Scheme Order 2013

Officer in charge of the search

Name or warrant number: RUPERT DENYE

Environment Agency address:

LUNEA House
DODD Way
PRESTON

Postcode: PR5 8BX

Telephone: 03708 506506

A summary of the powers and rights is given overleaf

LPROB 03/14

Appendix 2 – Fire Service Incident Handover Form

Lancashire Fire and Rescue Service

Incident Handover Form № 4959

Incident Type: SCRAP YARD FIRE COMMERCIAL	Incident Number: [90]00768 7
Incident Address: RECYCLING LIVES PRESTON PR2 5BX	
Incident Commander Rank/Name: OWM JOHN COSTELLO	Service Headquarters phone number 01772 866842 (8am-4pm) Monday to Friday
Contact details: 01772 795777	

Representative receiving responsibility

Name (print): GRAEME SLATER	Position: Facilities
Agency/Organisation: RECYCLING LIVES	Date (DD-MM-YYYY): 27/01/2019
	Time (24 hrs):

Hazards Identified

The incident is now left in your sole charge and control. The following guidance is provided for your safety and for the safety of others.

DO NOT RELEASE WASTE WATER UNTIL HAD THE INSTRUCTION OF UNITED UTILITIES, THAT IT IS SAFE TO DO SO IN THE CORRECT MANNER.

The above hazards have been identified as far as reasonably practicable by the Incident Commander and have been fully explained. I confirm that I have read and understood the above guidance and agree to accept control of the premises/site. I understand the need to carry out my own risk assessment.

Representative/ Responsible person	Date 27/01/2019
Incident Commander	Date 27/01/2019

Privacy Notice – Information collected following an incident, in particular personal data, will be managed in accordance with the Freedom of Information Act 2000 and the Data Protection Act. If you wish to know what Lancashire Fire and Rescue Service does with the personal data we collect about you please visit www.lancsfirerescue.org.uk and search for Privacy Notice. Alternatively we can send you a copy of the privacy notice, this can be requested by contacting us on the above mentioned telephone number.

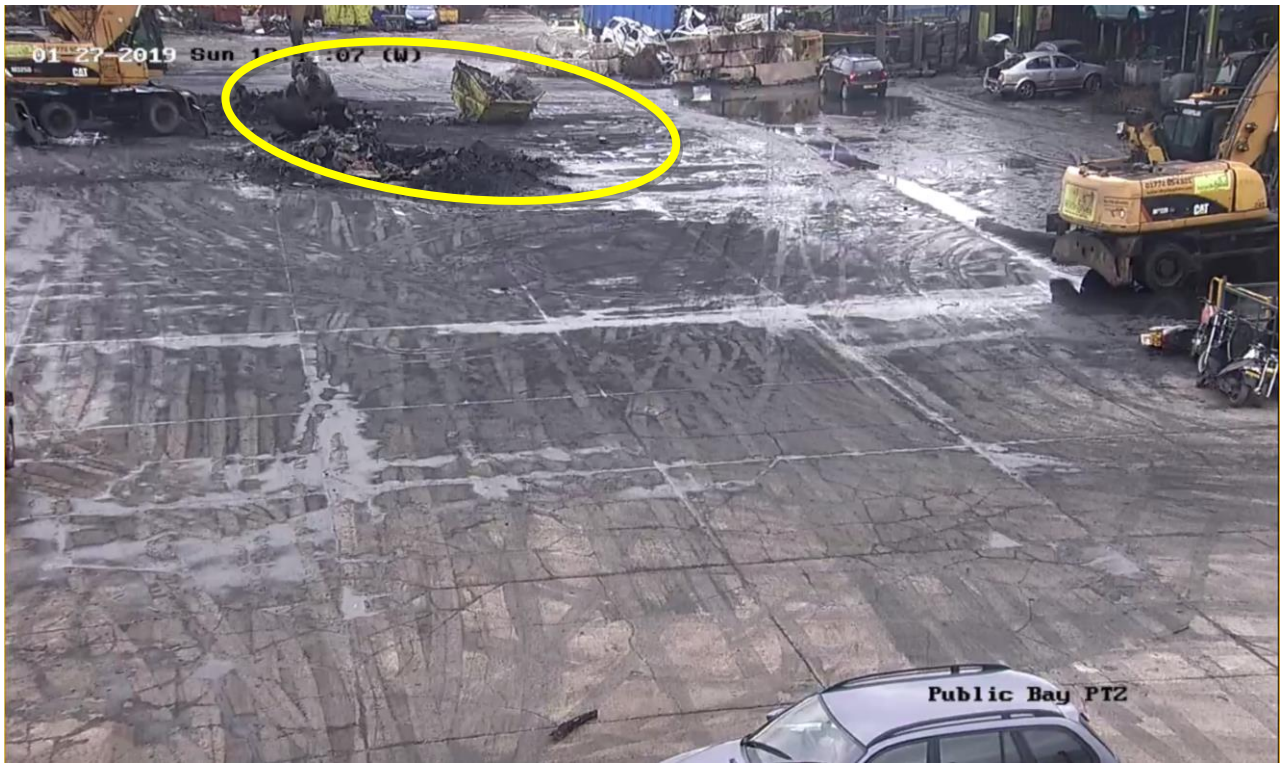
Appendix 3 – Ongoing repairs to concrete on top yard 28 Jan 19

Appendix 4 – New concrete barriers implemented 28 Jan 19 to shield fuel tanks beside depollution building

Incident Report

Appendix 5 – Clean-up almost completed on Top Yard at 1344hrs Sun 27 Jan 19

* Note area of damaged concrete highlighted by the yellow ring



Incident Report

Appendix 6 – Image showing firefighting process 0307hrs Sun 27 Jan 19

* Note the Recycling Lives crane in the middle of the picture holding up a car to enable the Fire Service to spray it with water