



Environmental Management System Fire Prevention Plan

Land at Salamons Way, Rainham, RM13 9UL

Reference: MGR-EMS-OP-03 Version 1

January 2025



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Document Reference:
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CONTENTS

1	INTRODUCTION	3
1.1	Purpose	3
1.2	Scope	3
1.3	Objectives.....	3
1.4	Site Location.....	3
1.5	Roles and Responsibilities	3
1.6	Summary of Operation	4
1.7	Overview of Waste Processing	4
1.8	Non-Permitted Waste	5
1.9	Site Plan(s).....	5
2	CAUSES OF FIRE	6
2.1	Arson	6
2.2	Plant and Equipment.....	6
2.3	Electrical Faults including damaged or exposed electrical cables.....	7
2.4	Discarded Smoking Materials	7
2.5	Hot Works.....	7
2.6	Industrial Heaters	7
2.7	Hot Exhausts	8
2.8	Ignition Sources.....	8
2.9	Batteries	8
2.10	Leaks and Spillages	8
2.11	Build-up of Loose Combustible Waste, Dust and Fluff	8
2.12	Reaction between Wastes	9
2.13	Waste Acceptance and Deposited Hot Loads	9
2.14	Hot and Dry Weather	10
3	PREVENT SELF COMBUSTION.	11
3.1	Material Receipt, Treatment and Storage	11
3.2	Fire Walls and Bays	13
3.3	Fire Quarantine Area (FQA).....	13
3.4	Training, Awareness and Visitors.....	13
4	FIRE DETECTION AND MANAGEMENT	14
4.1	Detecting and Suppressing Fires	14
4.2	Firefighting strategy.....	14
4.3	Water Supplies.....	15
4.4	Managing Fire Water.....	16
4.5	During and After an Incident	17



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

1 INTRODUCTION

1.1 Purpose

The primary purpose of this Fire Prevention Plan (FPP) is to guide staff and contractors in the prevention of fire. This FPP also confirms the actions to be taken in the event of fire to minimise any impact on the environment and to control the fire where appropriate.

This FPP will be issued to the Fire Brigade in the event of a fire to aid with firefighting.

1.2 Scope

The main operations at the site will be the storage and transfer of waste glass, and screening and crushing of some glass materials. The operator will also extract and store any metal, and store uPVC. Both of which are materials that are often associated with the glass.

This FPP has been requested by the Environment Agency as the site will store uPVC and metal. It has been prepared in accordance with the guidance¹ However, it must be noted that the FPP guidance does not apply to glass as it is non-combustible. For completeness, this FPP includes details relating to the waste glass operations, but the FPP guidance does not apply to waste glass.

The operations currently take place using exemptions.

1.3 Objectives

The objectives of the Fire Prevention Plan are:

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

1.4 Site Location

The permitted site will cover two properties at Salamons Way, Rainham, RM13 9UL, centred at NGR TQ51335 81469. No 5 Salamons Way (the south site) will be the main operational base. The site office and weighbridge are located here. No.10 Salamons Way, is opposite and will be used for storage and treatment.

The site is within an established industrial estate. Other commercial occupants include concrete batching, tyre replacement, vehicle repair, garages and builders yards.

A map of key receptors within 1km is shown in Annex A.

1.5 Roles and Responsibilities

The Directors are specifically responsible for:

¹ <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

- Ensuring the adequate training of staff and contractors working on site regarding the content of these procedures;
- Ensuring the provision and maintenance of hand held fire extinguishers and other firefighting equipment at the site is adequate.

1.6 Waste Acceptance

MGR provide a specific service for handling waste glass and UPVC. Customers contact MGR to specifically arrange for the collection and handling of waste glass, and associated materials such as uPVC.

At the time of booking, new customers will be advised of the wastes that are permitted to be deposited at this site.

MGR provides containers and skips to construction projects or manufacturers, to enable them to source separate glass and UPVC.

The drivers collecting the waste will check the contents of any container at the point of collection. This will ensure that only the specified waste is transferred to the site.

For third parties delivering waste, the customer will be informed about the wastes that can be accepted. The operator does not accept mixed loads of construction waste.

For MGR collected waste, all waste delivery vehicles will first be weighed at No.5 Salamons Way.

For third party deliveries, the operator will check the waste carrier details and check the contents of the load.

The driver will provide the necessary paperwork to the site office (Waste Transfer Notes).

The driver will then be instructed to unload the waste either in the existing site or in the application site.

The vehicle will be unsheeted when ready to discharge.

1.7 Overview of Waste Processing

The operator will provide storage bays using concrete blocks which can be interchangeable to store different types of glass. The following types of glass will be accepted:

- Clean Plate / Flat Glass



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

- Double glazing
- Bottles
- Laminated
- MRF Glass

The bays could also be used for providing additional storage capacity for mixed plate (tinted, sealed, mirrored and wired glass) and windscreens.

A separate bay or containers will be used for UPVC. This could be off-cuts from UPVC manufacturers and glaziers, or waste UPVC from development projects.

The site layout has been designed to enable the storage bays to be positioned around the edge of the site. This allows the rear concrete wall to provide both a containment wall and site boundary barrier.

The flat glass will be used to produce cullet. This will be in accordance with the WRAP protocol.² The certified process will involve treating the waste glass by crushing, handpicking any contaminants and magnetic screening to remove metal.

The metal will be stored in a bay.

1.8 Non-Permitted Waste

A general waste skip will be used to quarantine any non-permitted waste. The quarantine container is shown on Drawing No. MGR-SW-FPP-01.

The quarantine containers will be checked daily, and arrangements made to remove the waste as and when required. The quarantine container may be moved around the site.

All staff will receive training to identify non-compliant waste.

1.9 Site Plan(s)

The site plan is shown on Drawing No MGR-SW-FPP-01.

² Quality Protocol. Flat Glass, the quality protocol for the production of processed cullet from waste flat glass.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

2 CAUSES OF FIRE

2.1 Arson

Both sites are secured by concrete walls, fences and lockable front gates.

There is no rear access to either site.

All gates are locked when sites are not manned.

CCTV is provided around both sites. The site manager can access the images through a mobile phone.

The site security shall be fully inspected at the commencement of each working day. Any defects or damage shall be made secure by temporary repair by the end of each working day and shall be repaired with 7 working days of the damage being detected.

All inspections, defects, damage and repairs shall be recorded in the site diary.

Both sites will be secured when unattended.

Visitors shall be directed to the site office and required to sign in on entry and make their presence known to a member of staff and will be escorted around the sites. Visitors will sign out before departure. Unauthorised visitors who fail to adhere to company rules will be escorted from site and a record of the event made in the site diary.

If during the site checks, there is evidence of unauthorised access or vandalism, the plant and equipment will be checked. In the event that machinery has been damaged or stolen, which will affect the day to day operations at the site, the Site Manager will make arrangements for replacement parts. If the operations cannot continue, the Site Manager will cease accepting those wastes affected by the cessation. For example, if equipment has been stolen or damaged which prevents the operator from crushing glass, that part of the activity will cease pending replacement equipment. The storage and transfer will continue.

2.2 Plant and Equipment

The site will use the following mobile plant and equipment:

- Crusher x1
- Screener x1
- Material Handler x2
- Loading Shovel x2
- Forklift x1



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

The facility will have a written Planned Preventative Maintenance Programme to ensure all machinery and components continue to remain effective.

The programme of routine planned maintenance will be provided for each item of plant and machinery, as well as the processing equipment to prevent breakdown and faults which may pose a fire risk.

All faults which require corrective action will be reported to the Site Manager to be implemented.

The plant and equipment will be subject to service agreements with the manufacturer and/or supplier. Where appropriate, these agreements will include a 24 hour call out facility.

The process equipment will be new, designed specifically for this site.

A list of essential items will be prepared to ensure that an adequate supply of spare parts can be provided on site. This includes items such as fuses, switches and bearings. This will enable efficient repairs to be made on site to avoid process delays. There is a workshop on site to facilitate this.

To ensure all permitted waste quantities are adhered to and no amenity issues or increased fire risks are caused, MGR will ensure will arrange for the uPVC and metal waste to be removed from the site regularly. MGR has outlets for both waste streams to ensure continuous removal and capacity is maintained.

The waste is not subject to seasonality.

In the event of a fire at the site, MGR will notify any booked deliveries to divert to another waste facility. The Site Manager will maintain a register of alternative sites, including telephone numbers and contact details.

A fire extinguisher will be provided in each mobile plant.

2.3 Electrical Faults including damaged or exposed electrical cables

All electric cables will be checked daily and certified by an electrical contractor.

2.4 Discarded Smoking Materials

No smoking is permitted within the permit boundary. This is reinforced with training and site notices.

2.5 Hot Works

As part of waste operations, hot works will not be needed. However, if hot works such as welding are required as part of building or equipment repair or maintenance, a suitably qualified person will be used, and a fire marshal shall be appointed to oversee the works. Following completion of the works, the fire marshal will check to ensure everything is cooled and there is no fire risk as a result of the works.

2.6 Industrial Heaters

No industrial heaters are used at the site.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

2.7 Hot Exhausts

During operations, banksmen and site operatives will be vigilant for signs of ignition from operational hot exhausts such as those on vehicles used for transport and waste movement. This will include checks at regular intervals during the operational hours.

When vehicles are not being used, they will be switched off and parked in the dedicated parking areas, which are away from processing equipment, waste and combustible materials. As part of the daily site checks, there will be a fire watch check at the end of the working day.

2.8 Ignition Sources

There will be no naked flames, space heaters, furnaces, incinerators or any other sources of ignition on the site.

2.9 Batteries

Batteries will not be accepted at the site. Batteries are not typically associated with the wastes been handled on the site.

2.10 Leaks and Spillages

The spillage procedure will be implemented in the event of a leak or spillage from site vehicles or waste delivery/collection vehicles. Spill kits will be kept in the office. All staff will be trained in the use of the spill kit.

Further information on the spillage procedure is provided in Annex E.

2.11 Build-up of Loose Combustible Waste, Dust and Fluff

Good housekeeping will be maintained at all times to ensure dust and litter are prevented from accumulating on site.

The waste will be unloaded and stored in designated bays.

Litter is not associated with uPVC. The metal will be segregated and stored in a container.

As part of the daily checks, signs for litter and debris around the site will be recorded and action taken to remove such materials. The general cleanliness of the site will be checked throughout the working day.

The site will be subject to regular cleaning. Typically, this will involve daily sweeping of the yard area, with a more detailed clean at the weekend. The weekly clean will involve checking each waste bay and around the perimeter wall. The cleaning schedule is provided in Table 1.

It is proposed to deploy a road sweeper on a weekly basis as a minimum to clean the entrance area and yards.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

Table 1 – Cleaning Schedule

	Daily	Weekly	Annually
Full Site Check	✓		
Vehicle Wheels	✓		
Site Entrance	✓	✓	
Site Access	✓	✓	
Storage Bays – concreted	✓	✓	Full site Audit
Mobile plant, crusher, screener	✓	✓	

The need for cleaning will form part of the Daily Site Checks.

The TCM will nominate a site operative(s) to be responsible for carrying out these tasks. The TCM will follow up any complaints or incidents with a full inspection.

2.12 Reaction between Wastes

The site does not store wastes which are incompatible.

2.13 Waste Acceptance and Deposited Hot Loads

The acceptance of uPVC is unlikely to involve hot loads.

The following actions are taken to prevent fire arising from a hot load:

- All drivers will be required to stop at the weighbridge when entering the site.
- If the load is observed to be smouldering, the vehicle will not be allowed to deposit its load. Instead, it will be directed to the quarantine area.
- Using water supplied by a fire hose, the waste will be cooled and if necessary the fire service will be contacted.
- If a load is found to be smouldering once it has been deposited within any reception bay, if deemed safe to do so, a load machine will be used to turn the waste and use fire extinguishers.
- No more waste will be deposited until the smouldering waste has been dealt with and the Site Manager has confirmed it is cooled and no longer a fire risk.

All staff will be trained to be vigilant for hot loads. All incidents of hot loads will be recorded on the Incident Form.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

2.14 Hot and Dry Weather

All waste will be received and stored in dedicated storage bays.

Whilst pending the transfer of any waste, the machine operator will turn the waste more frequently.

Dust suppression is provided on both sites. During dry weather conditions, the dust suppression will be activated to keep the waste cool and prevent dust emissions.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

3 Prevent Self Combustion.

The site operates in accordance with a management system. Operational Procedures are set out in EMS-OP-01. This provides information on the amount of waste to be processed, including storage areas and storage times.

In addition to the Operational Procedures, the following reasonable actions will be taken to minimise the risk of fire, in accordance with Environment Agency guidelines. However, the guidance does not provide any storage limits for waste glass as it is a non-combustible waste.

3.1 Material Receipt, Treatment and Storage

3.1.1 Waste capacity

The annual throughput will be 80,000 tonnes.

3.1.2 Waste Acceptance

The site will predominantly handle waste glass. In association with this work, MGR work with glaziers and construction works replacing windows and doors. The site will also receive UPVC from such sources. The following codes will be accepted:

150107	Glass packaging
160120	Glass
170202	Glass
191205	Glass
191212	Mixed waste containing Glass
200102	Glass
170203	UPVC
170904	UPVC with glass and metal
191204	UPVC
200139	UPVC

3.1.3 Waste storage times, Stock Management and Rotation

The waste will be received, processed and removed from the site typically within one month. No waste will be kept on site for longer than 3 months.

During the Daily Checks the site manager will also monitor for any signs of combustion and hotspots. Hotspots are unlikely to occur given that:

- The waste is predominantly glass and is non-combustible;
- The waste is stored for less than three months; and
- UPVC will generally meet Building Regulations fire safety requirements.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

However, in the event that the Site Manager is aware of localised warming, it will be dissipated by turning the waste or applying a cooling water spray.

The site also has height markers around key areas of the site to monitor stockpile heights.

For ease, the following storage limits have been set and apply to all waste (regardless of combustibility).

Table 2A – Waste Storage (5 Salamons Way)

Waste Type	Storage Area	Max. Pile Height	Maximum Storage Volume
Mixed Plate	10m x 7m 70m ²	3m	150m ³
Clean Plate	10m x 7m 70m ²	3m	150m ³
Windscreens	10m x 7m 70m ²	3m	150m ³
MRF Glass	9m x 5m 45m ²	3m	100m ³
Cullet	6m x 7m 45m ²	3m	100m ³

Note: volume not based on uniform dimensions. Bays will be interchangeable depending on market conditions. The storage limits will be the same.

Table 2B – Waste Storage (10 Salamons Way)

Waste Type	Storage Area	Max. Pile Height	Maximum Storage Volume
Double Glass	4m x 5m 20m ²	3m	40m ³
Double Glass	4m x 5m 20m ²	3m	40m ³
Metal	4m x 5m 20m ²	3m	40m ³
Glass	6m x7m 42m ²	3m	80m ³
Glass	6m x7m 42m ²	3m	80m ³
Glass	6m x7m 42m ²	3m	80m ³
UPVC*	6m x 2.5m 15m ²	2.1m	31.5m ³
UPVC*	6m x 2.5m 15m ²	2.1m	31.5m ³

Note: volume not based on uniform dimensions. Bays will be interchangeable depending on market conditions. The storage limits will be the same.

*waste stored in containers.

The storage bays will be checked daily to ensure that the capacity is maintained. Once any bay is 75% full, arrangements will be made to transfer the glass. For the clean plate glass, the bays will be checked and when the bay is 50% full, the glass will be crushed.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

The same checks will apply to the storage containers. Additional spare containers will be available to maintain capacity.

With reference to the FPP guidance, there is no maximum storage limit for waste glass.

3.2 Fire Walls and Bays

Regardless of the non-combustibility of glass, waste will be stored in concrete bay walls.

The UPVC will be stored in separate containers.

Metal will be extracted and stored in a bay within a bay constructed from concrete blocks. The concrete walls will be constructed using legio blocks or similar. The fire resistance for these blocks is provided in Annex F.

3.2.1 Diesel Tank

A fuel tank is provided in front of the site office, away from the waste activities.

3.3 Fire Quarantine Area (FQA)

Waste quarantine will only apply to the uPVC and metal. These will be in the northern part of the site. If required, the entire container will be placed in the fire quarantine area. For the metal, the FQA has been sized using the same dimensions as the bay. This ensures that the FQA could hold at least 50% of the contents.

The FQA has a clear 6m surround.

3.4 Training, Awareness and Visitors

All staff and contractors working on-site will be aware of this FPP and will understand its contents.

Through site inductions and on-going staff awareness and training, MGR will ensure that all relevant staff and contractors will:

- Understand what they must do during a fire.

In addition, staff will take part in any fire drills.

For visitors to the site:

- They will be escorted at all times following signing in.
- They will understand the no smoking policy for the site.
- When signing in, information on the fire exits and muster point will be provided.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

4 Fire Detection and Management

4.1 Detecting and Suppressing Fires

All staff are trained to be vigilant in terms of fire detection. The detection system must be proportionate to the nature and scale of the waste management activities and associated risks. At this site, the nature and scale associated with the waste is considered to be low in terms of combustibility. No formal detection system is proposed. No waste is stored inside a building.

Fire extinguishers will be available around the site. These will be installed by a certified provider.

There is mains water supply and dust suppression has been provided around the site. This will be used to help keep the waste cool during hot weather conditions and can also be activated in the event of a fire.

4.2 Firefighting strategy

In the event of a fire being detected, the following steps will be taken:

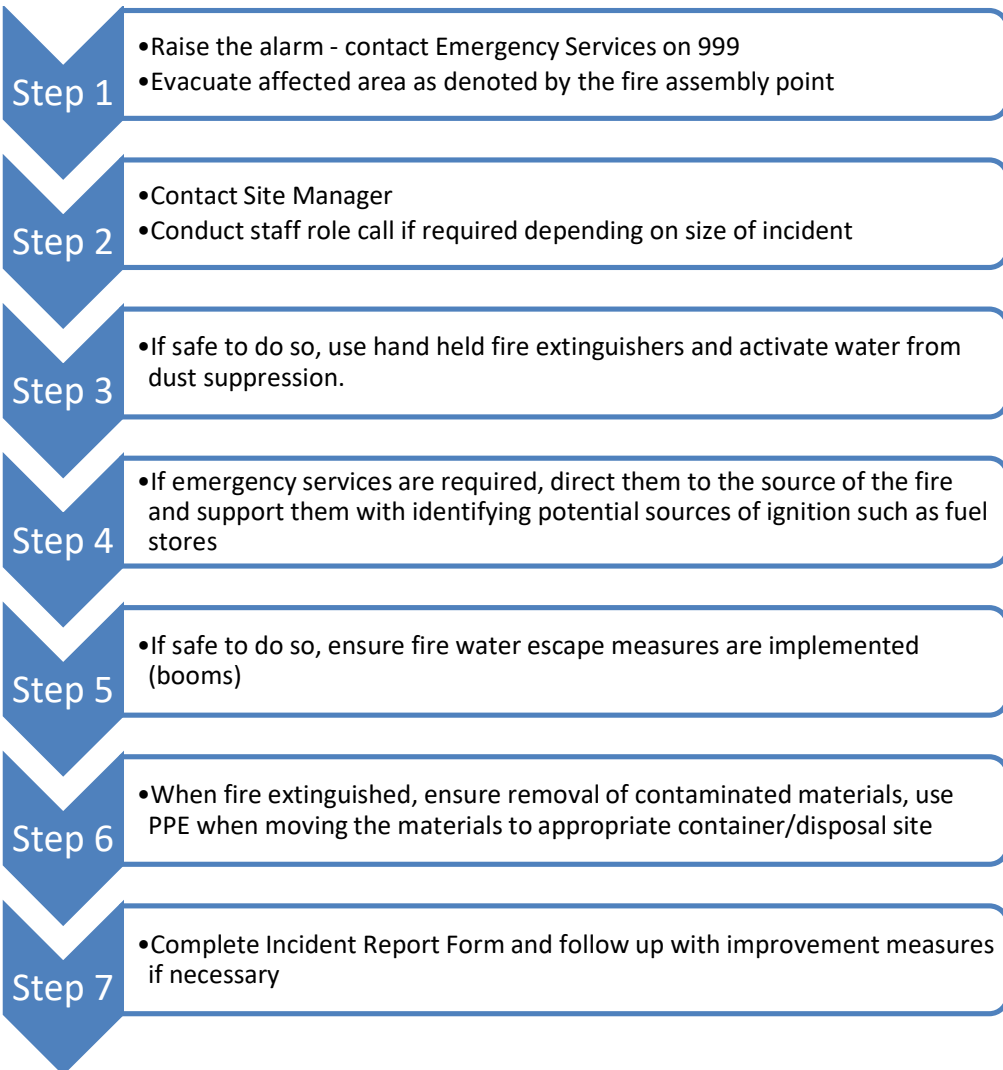


Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025



All staff are trained in these procedures.

The contact list of emergency numbers in Annex C will be retained in the Site Office and updated as required by the Site Manager.

4.3 Water Supplies

Water supplies for firefighting can come from:

- Mains supply on site
- Fire Hydrant in Salamons Way.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

4.4 Managing Fire Water

In the event of a fire, a fire boom will be placed the front entrance to contain any fire water. The remainder of the site is contained used concrete blocks.

Staff will be trained in the use of such booms and will be aware of when to deploy them, if safe to do so i.e. if human life will not be put at risk.

The fire risk associated with the site is linked to the storage of combustible waste in the northern site i.e. uPVC and metal. No crushing or screening of these wastes will take place.

The sealed drainage has not been used to provide any capacity for fire water.

All staff will be trained to deploy boom. The implementation will form part of the annual fire drill. It is anticipated that the boom could be deployed within 10 – 15 minutes. The boom will be kept at the main office to ensure that they remain accessible.

The Environment Agency provides guidance on managing fire water generated if a pile of combustible waste was on fire. Given that the waste being managed at the site is predominantly non-combustible, the limits provided in the guidance do not directly apply.

For the purposes of calculating potential fire water management, the worse case scenario would involve a full bay containing metal.

Assuming a scenario in which combustible waste was on fire, the following fire water management would be required:

Litre/min/1m ³ of waste (l) ^a	6.6
Largest combustible pile (m ³)	40
Litre per minute required (l)	267
Litres over three hours (l)	48,000
Internal storage volume ^b (l)	120,000

^a Based on EA guidance that 2000l /minute of water is required for a 300m³ stockpile for three hours

^b Including 16cm high booms across front of the site giving a contained area approximately 1,200m²

The combined controls set out above demonstrate that fire water would be contained on site.

To remove any contained fire water from the site, it will be possible to use a tanker to extract the fire water from the drainage system and containment area.



Fire Prevention Plan

Document Reference:
MGR-EMS-OP-03

Version: 1

Issue Date: 31 January 2025

4.5 During and After an Incident

In the event of an incident, all waste will be diverted to a third party operator. There are other sites which could receive the waste.

Neighbouring properties and businesses will be notified by text. The Site Manager will maintain a contact database for this purpose.

Once the fire has been extinguished and the site has been deemed safe to enter, an assessment of the fire damage will be made. Arrangements will be made to tanker away the fire water to allow access to the site. Any fire residues will be loaded into containers and removed from the site for disposal. Fire residues will be tested prior to removal.

All equipment will be checked by the manufacturer to ensure that it remains fit for purpose. Any repairs will be made by the manufacturer and the commissioning phase will need to be signed off by the manufacturer before waste processing recommences.

The cause of the fire will be investigated to understand what occurred and what measures need to be in place to prevent a recurrence. Advice will be sought from the Fire Service and this Fire Prevention Plan updated accordingly.

Annex A: Location of Key Receptors

The receptors shown below are within 1 km of the site. The receptors list and plan have been derived from the Environmental Risk Assessment and identify all receptors that may be sensitive to a risk.

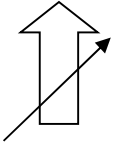
Wind Direction

According to the UK Met Office, the prevailing wind direction in the area is South-Westerly³.

Receptor	Legend	Type	Distance and direction from site
Ferry Lane Industrial Estate	A	Industry	Surrounding
Denver Industrial Estate	B	Industry	210m North
Ferry Lane Industrial Estate	C	Industry	140m South
Fairview Industrial Park	D	Industry	215m West
Riverside Sewage Treatment Works	E	Waste Water Treatment Works	455m North
Heriot Road	F	Residential	950m North
Capstan Drive	G	Residential	970m North East
Inner Thames Marsh SSSI	H	Ecological	100m South East
River Thames	I	Surface Water	465m South West
River Ingerbourne	J	Surface Water	140m West
A13	K	Road	140m North

³<http://www.metoffice.gov.uk/climate/uk/regional-climates/so>

Site Setting and Receptors (The permitted site is shown with a green boundary). Blue shows 1km radius from centre point of site.



South Westerly
Wind Direction

Annex C: Emergency Contact Numbers

Name & Address	Telephone Number	Telephone Number
Emergency Services	Fire, Police, Ambulance	999 101 Non Emergency
Environment Agency	General Enquiries: Incident Hotline Reporting:	03708 506 506 0800 80 70 60
Power and Electrical	National Power Cut Helpline UK Power Networks	105 0800 028 0247
Gas	National Gas Emergency Service	0800 111 999
Local Authority Emergency Services	London Borough of Havering	01708 433999
Nearest Hospital	Queen Elizabeth Hospital	020 8836 6000

Annex D Daily Site Checks Form (from EMS-FR-01)

Date						
Checked By (Initials)						
Weather						
Gates and boundary (walls and fences)						
Evidence of vandalism						
Capacity of Quarantine Area (% full)						
Storage volumes:						
Dust Suppression:						
Signage clear and intact						
Fuel Tank						
Plant – general condition						
Concrete Bay Walls						
Concrete surface						
Local Amenity (dust, mud, noise)	8.00	10.00	12.00	14.00	16.00	18.00
Site Entrance						
Salamons Way – Between Sites						
Operational Area						
FQA clear						
Fire Extinguishers						
Mobile Plant Parking at end of day						
Actions						
Report any defects to the TCM immediately						

Annex E – Spillage Procedure

Potential causes of a spill

Minor spillages may be caused by:

- Machinery and fuel/oil leaks from vehicles
- Leaks from the diesel tank

Prevention of Spillages

Spillages and impacts from spillages will be prevented by:

- Controlling vehicle manoeuvring
- Regular maintenance of plant and machinery
- Safe storage of chemicals and fluids
- Diesel tank to be double skinned and banded
- Spill kits maintained in site office and workshop

Spillage Procedure

If a spillage of any liquid other than water occurs on site

- Assess the nature and volume of the liquid
- Take immediate action to avoid anyone coming into contact with the liquid
- Use spill kit or stored absorbent materials [soils, bagged granules, sand etc]
- Once securely soaked make appropriate arrangements to move the material to a suitable non-drained container
- Clearly mark the container with the contents and isolate it
- Use plant to load larger spillages

Once the immediate spillage is controlled

- Clean or dispose of all equipment which came into contact with the spillage
- Clean the area of the spillage taking care to remove contaminated materials to the isolate container
- Assess the material for suitable disposal options- take samples if necessary and contact the EA for advice
- Ensure the material and container are securely stored on site for the duration of its stay- this may take some time depending upon the sampling/ analysis period and any action to be taken by the EA
- Once the disposal option is decided ensure completion of all appropriate documentation and safe removal of the material

Site management will

- Record all details of the incident using waste assessment form and site diary. Record to include where the material came from and all relevant documentation, notes, emails, correspondence and conversations
- Ensure prompt replacement of contaminated materials and any other items used and disposed of in the course of controlling the incident
- Investigate the incident and implement procedure review to prevent and recurrence. This may include writing to the waste procedure advising them of the incident and the enforcement and commercial implications of it.

Spill Kits

Spill kits will be maintained at the facility in order to respond to any spill incident. The spill kits will include:

- absorbent granules;
- sand;
- sand bags;
- protective overalls;
- chemical/oil resistant gloves;
- chemical/oil resistant goggles; and
- a broom and shovel.

Annex F – Concrete Bay Walls



Consulting engineers in:
– Acoustics
– Building physics

Kees Rijk BV
Watertorenweg 24
6571 CB Berg en Dal
The Netherlands
info@keesrijk.nl

Fire resistance REI 240 Legioblock



Kees Rijk BV confirms that Legioblock walls with a separating function have a fire resistance of 240 minutes, in accordance with the standards NEN 6069:2011 and EN 13501-2:2016.

This summary is based on the report 171404 “Legioblock concrete retaining walls; Fire resistance study“. In the report, the application area and the limiting conditions are described.

Ir. C.A.E. (Kees) Rijk
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