FIRE PREVENTION PLAN

Aveita Ltd

Blyth Road

Carlton Forest

Worksop

S81 0TP

Version 1.1 January 2025

SJW Enviro Consulting Ltd

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1.0 Purpose

The purpose of this document is to identify potential fire hazards, detail the controls implemented to prevent fires and the actions taken to reduce the impacts should there be a fire on site.

This plan has been prepared in conjunction with the format prescribed by the Environment Agency and detailed in the Environment Agency Guidance Document – *Fire Prevention plans: environmental permits* published 29 July 2016 and updated 11 January 2021.

2.0 Scope and Objectives

This Fire Prevention Plan is applicable for Aveita Ltd. Blyth Road, Carlton Forest, Worksop, S81 0TP.

The fire prevention measures in this plan have been designed to meet the following objectives:

- Minimise the likelihood of a fire happening
- Aim for a fire to be extinguished within 4 hours
- Minimise the spread of fire within the site and to neighbouring sites.

3.0 Management responsibilities

3.1 Site management

- Ensure the effective implementation of the Fire Prevention Plan;
- Allocate sufficient resources to ensure that the Fire Prevention Plan can be implemented;
- Monitor the overall effectiveness of the Fire Prevention Plan through regular site inspection and site operative liaisons;
- Regularly update the Fire Prevention Plan as required and carry out an annual review.

3.2 Site operatives

- Follow operating instructions and report discrepancies between these instructions and the work;
- Maintain the fire prevention controls implemented by Wellskye Limited (as detailed in this plan);
- Report any activities or events that could jeopardise the fire safety strategy.

4.0 The Site

4.1 The Site Location

The site is located approximately 2.8 kilometres to the northeast of Worksop town centre, as shown in Figure 1 below.

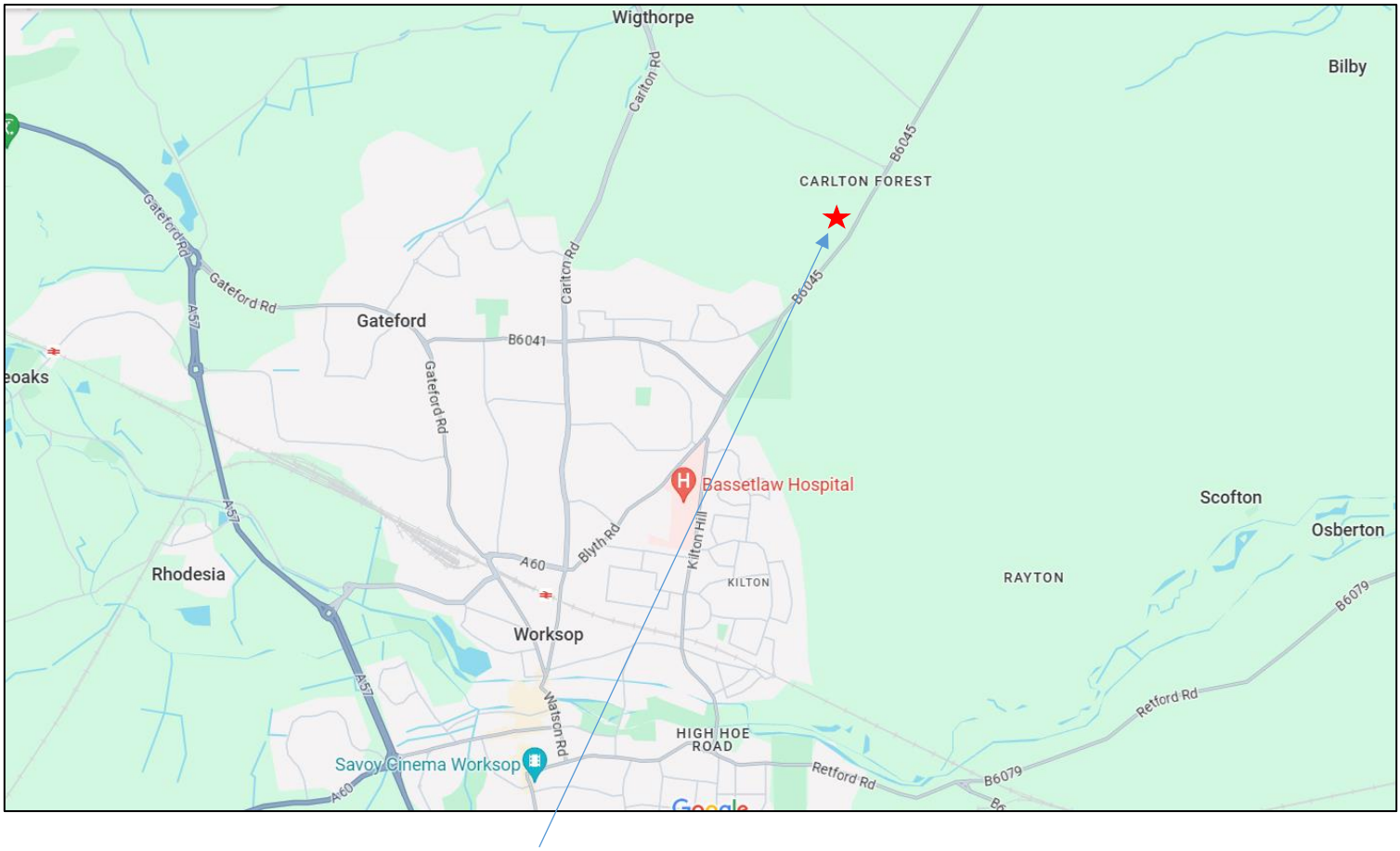


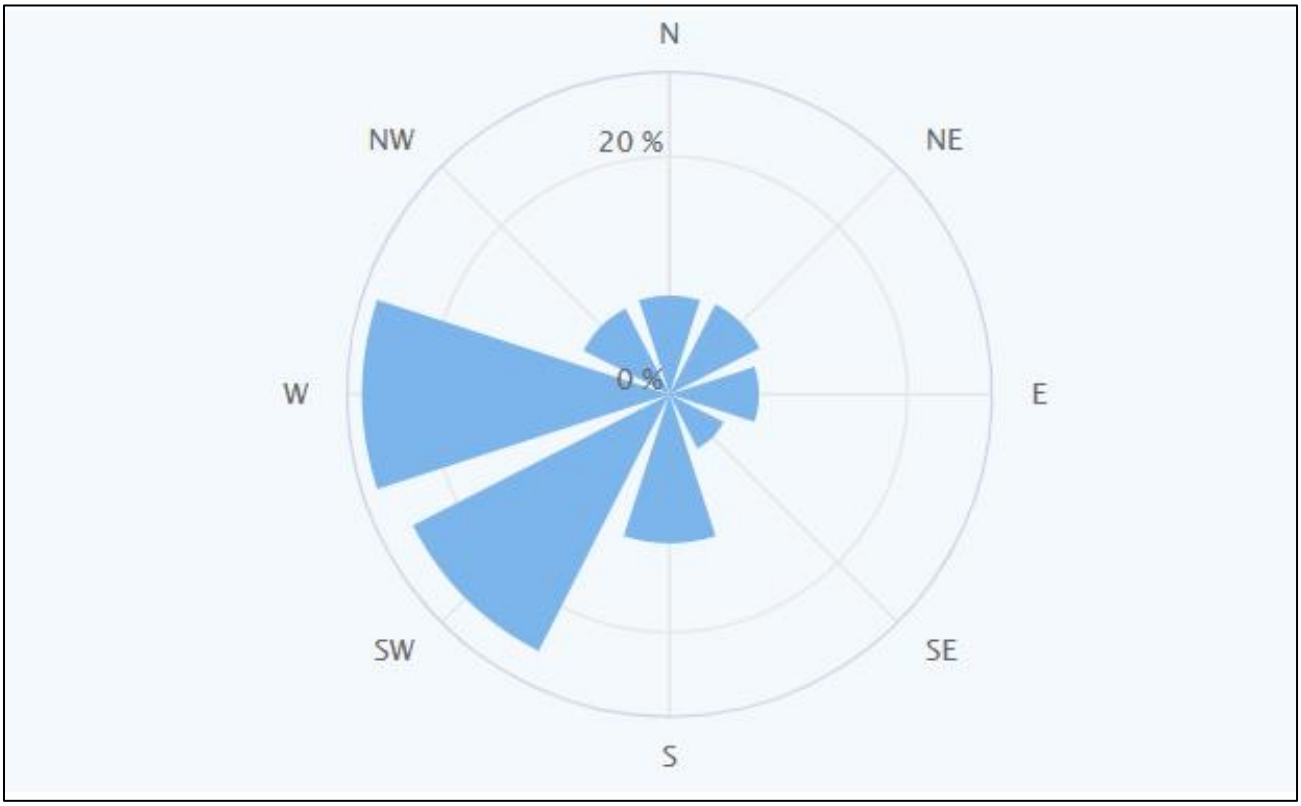
Figure 1: Location of the site

4.2 Local receptors

Within 1 km of the site the following key receptors are located:

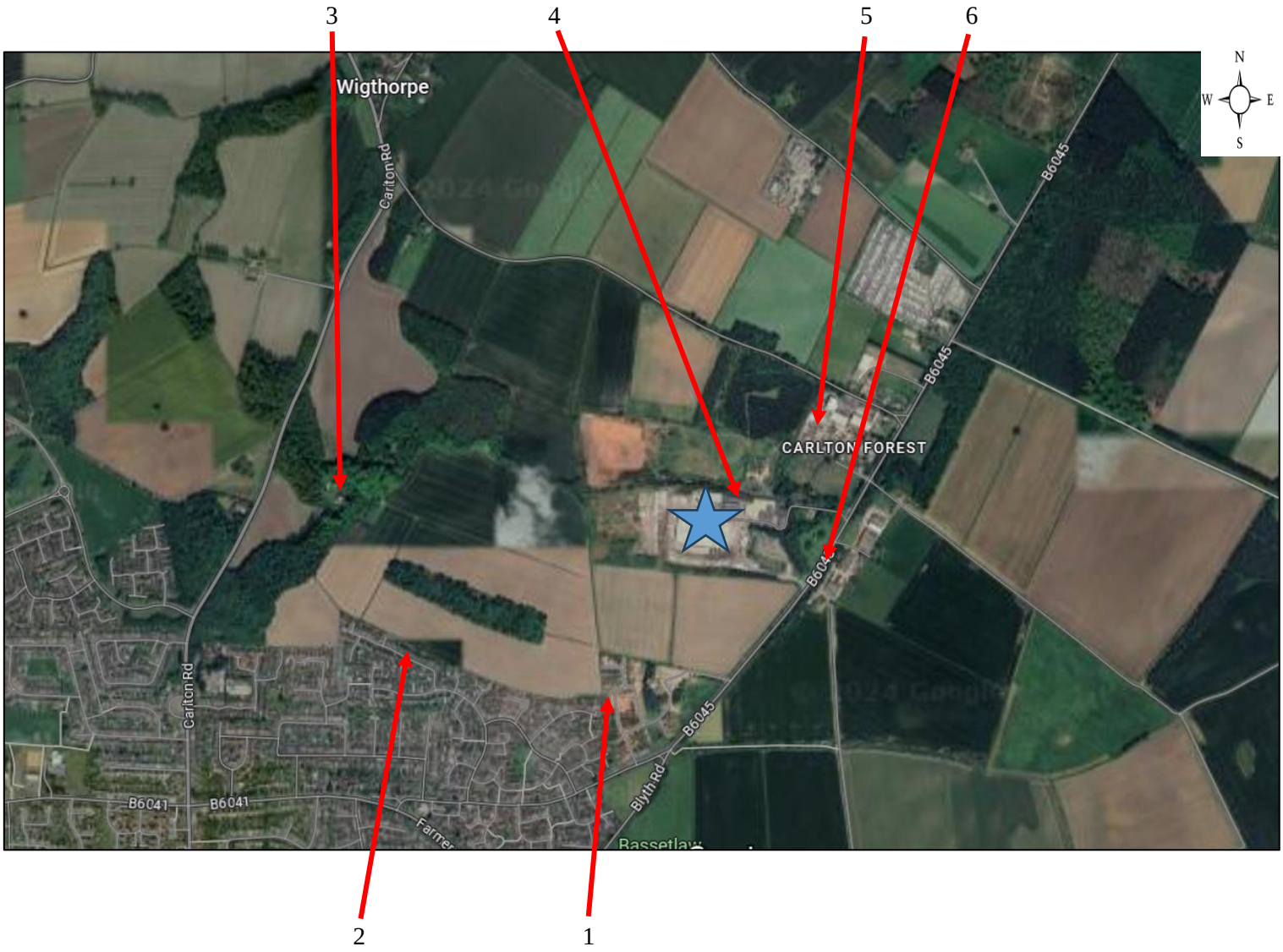
- Residential property located 280 metres to the south of the site and continuing to the 1 kilometre radius;
- Residential property located 625 metres to the southwest of the site and continuing to the 1 kilometre radius;
- A single residential dwelling located 850 metres to the west of the site;
- Industrial premises located directly to the north of the site;
- Industrial premises located 280 metres to the northeast of the site;
- The B6045 Blyth Road located directly to the east of the site.

These local receptors would be impacted by a fire on site, however, the prevailing wind direction is westerly and south-westerly thus reducing the likelihood of impact of air emissions on those receptors located to the north, south and west of the site. The wind rose for Worksop, shown below, illustrates this point.



The plan below shows the location of these sensitive receptors in relation to the site (shown by a blue star), the location of which is indicated by the red arrow. The numbers on the plan correspond to the following receptors:

1. Residential property located 280 metres to the south of the site and continuing to the 1 kilometre radius;
2. Residential property located 625 metres to the southwest of the site and continuing to the 1 kilometre radius;
3. A single residential dwelling located 850 metres to the west of the site;
4. Industrial premises located directly to the north of the site;
5. Industrial premises located 280 metres to the northeast of the site;
6. The B6045 Blyth Road located directly to the east of the site.



In addition to the sensitive receptors identified above there are several areas of protected deciduous woodland within a one kilometre radius of the site. These areas are shown green in the plan below. The black circle is the one kilometre radius from the centre of the site indicated by the blue dot.

5.0 Site activities

5.1 Permitted activities

This Fire Prevention Plan accompanies an application for an environmental permit to legitimise the storage and processing of end-of-life vehicles and their constituent parts.

5.2 Other non-permitted activities

As well as the permitted activities above the site also stores potentially flammable liquids that could pose a fire risk. The location of the storage areas for these non-permitted substances are shown on the attached plan Ref. WL/BLY/FPP/01, site layout plan. This material comprise fuel for the plant and equipment on site which is stored within the bunded area which contains all the liquids on site.

There is no cutting equipment, aerosols or chemicals stored on site.

6.0 Managing common causes of fire

6.1 Arson

There is a security gate at the entrance to the site which consists of 2.1 metre high metal paling barrier topped with spikes. The security gate is locked at all times when the site is closed.

The site is surrounded by a minimum of 2.1 metre high fencing made up of metal paling topped with spikes.

Site boundary checks are completed weekly to ensure the site security is maintained and the risk of arson reduced.

The site is covered by CCTV cameras, both inside the buildings and in the yard areas. Outside of operating hours the cameras are remotely monitored by a security company and a fire on site would be quickly detected and the emergency services contacted.

6.2 Plant and equipment

Plant and equipment suitable for moving and depolluting end-of-life vehicles are used on site. All items of mobile plant are fitted with a fire extinguisher. Static plant and equipment, for example de-pollution machinery, is located predominantly within the depollution building and are marked on the attached drawing WL/BLY/FPP/01.

Site maintenance activities are performed in accordance with operating procedures Aveita Ltd understand the need for regular checks on all plant and equipment to ensure their efficient use. In summary, the following provisions are implemented:

- Plant maintenance schedules using the manufacturer's recommendations where vehicles are serviced after 500 hours of operation;
- Pre-use checks are completed prior to using plant and equipment daily;
- Defects are reported and actions taken based on priorities;
- All plant and equipment is visually inspected by the operator at the end of the working day for the purposes of identifying fire risks;
- Throughout the day operators are vigilant in checking vulnerable areas like exhausts and engine bays;
- Specialists contractors are used to perform maintenance outside the scope and expertise of the site management and operatives;
- All plant and equipment undergoes a thorough examination by independent insurers every 6 months as a minimum.
- All documentation relating to plant and equipment maintenance is retained in the site office for inspection.

Fire extinguishers are available on site should a small fire require fighting by site staff.

6.3 Electrical faults

All electrics on site, are installed by a fully qualified electrician. All portable electric appliances are PAT tested annually and certified by a fully qualified electrician. All installation and testing documentation is retained in the site office for inspection.

6.4 Discarded smoking materials

No smoking is permitted on any part of the site.

6.5 Hot works

No Oxy acetylene cutting currently takes place on site nor is there any other form of hot works cutting. This cannot therefore be a cause, or a contributory factor, to a fire on site. No size reduction treatments take place on any waste other than the baling of depolluted end-of-life vehicles, details of which are given elsewhere in this document.

6.6 Industrial heaters

This site does not use industrial heaters and these therefore cannot be a cause of fire.

6.7 Hot exhausts

While plant and equipment is in use throughout the working day and exhausts and engine bays inevitably heat up regular housekeeping takes place daily and operators continually and vigilantly monitor for potential fire risk situations.

At the end of the day mobile plant is parked away from the waste piles where possible. Checks are made by site management on all items of plant and equipment to ensure that they do not pose any fire risk prior to closing the site for the day.

6.8 Ignition sources

Sources of ignition have been assessed and reduced as far as reasonably practicable. Remaining ignition sources have been identified and controlled as follows:

Smoking is not allowed on any part of the site.

Hot works in the form of cutting of metal are not carried out on site and there are no gas bottles stored anywhere on the site at any time.

All portable electrical appliances are PAT tested annually and certified by a fully qualified electrician. Electric lights are insulated.

There is a potential for sparks as plant regularly comes in contact with metal and concrete surfaces. The general housekeeping however makes fires from this source unlikely.

Outside operating hours mobile plant is parked up away from any combustible material.

6.9 Batteries in end-of-life vehicles

Vehicles arrive at the site as end-of-life. They are stored on an impermeable surface with sealed drainage and the batteries are removed prior to depollution. Batteries are stored in dedicated lidded battery boxes under cover.

Batteries from electric vehicles are kept separately in their own dedicated containers and labelled accordingly.

6.10 Leaks and spillages of oils and fuel

Every attempt is made to prevent fuels and combustible liquids leaking or trailing from vehicles on site. Spill kits in the form of absorbent granules are located around the site.

Bunds on site are inspected daily to ensure their integrity remains. Any problems with the bunds will be rectified within the working day they are detected. Regular maintenance of plant and equipment ensures that it is kept working to its optimum level. All vehicles waiting to be depolluted are stored on a concrete pad with sealed drainage system.

Vehicles arriving at site as un-depolluted end-of-life are delivered directly to the storage areas in the vehicle depollution part of the site.

Should a spill occur staff are instructed to use the absorbent granules to cover the liquid and then clear up and place the contaminated material in a container awaiting removal from site to a suitably permitted facility for disposal.

6.11 Build-up of loose combustible waste

The site is visually inspected and cleaned daily to prevent the build-up of fragments that could cause slipping and tripping hazards. This also serves to prevent damage or punctures to vehicles using the site. As part of this process loose combustible waste is collected and placed in the residual waste containers prior to removal from site.

The nature of the site is such that very limited amounts of loose combustible material are ever found within the permitted area.

6.12 Reactions between wastes

The site accepts end of life vehicles and parts only. It is difficult to imagine any reaction between these types of waste, however, every load is inspected both as it arrives on site and when it is unloaded. If an adverse reaction has occurred in transit, then this would become apparent and necessary steps could be taken to deal with the situation. The site has a designated quarantine area where material can be isolated and dealt with accordingly.

6.13 Deposited hot loads.

The waste acceptance procedure at the site ensures that every load is checked before it is unloaded and further checks are made when the material is cleared to be off-loaded (see waste acceptance in section 8.1). Under these circumstances, it is highly unlikely that a ‘hot load’ would be accepted on site.

Should such an eventuality occur and a hot load is deposited on site the material would be immediately moved to the quarantine area where site staff would monitor or deal with the situation as necessary under the guidance of site management.

6.14 Size reduction treatment

The only size reduction of waste material on site is the baling of end-of-life vehicles that have been depolluted. This baling reduces the size of the vehicle substantially but also increases the surface volume.

It is unlikely that sufficient heat will be generated by the baling of vehicles to pose a significant fire risk, nevertheless, bales are placed away from the main bale pile for one hour after creation to allow them to cool prior to them being added to the pile of bales awaiting removal from site.

Subject to the availability of storage space for depolluted end-of-life vehicles baling will take place as close as possible to the date of removal of bales from site.

7.0 Preventing self-combustion.

7.1 Managing storage time.

On a daily basis all storage piles are visually inspected by the site manager for any anomalies, such as visual signs of heat, steam and vapour. Anomalies are actioned immediately by investigation and remedial action will be taken such as rotation of the material or damping down as deemed necessary.

Due to the nature of the business, site operators are located within the yard areas for the majority of the working day, they continually and vigilantly monitor the condition of all the processes for potential fire risk situations.

Electric vehicles coming onto the site are stored in a dedicated area, have their battery removed and are marked with stickers that clearly identify them as being electric. The same process also occurs for any LPG vehicles that arrive at the site.

Once a vehicle arrives at site it is processed quickly. Processing means that the vehicle is depolluted fully in the dedicated area, has potentially re-saleable parts removed and is then sent for crushing in the baler. Baled vehicles are stored on site until such time as a full load is available for onward transportation. This whole process will take a maximum of four weeks. No vehicle, once accepted at the site as end-of-life remains on site for more than three months. Batteries are removed immediately upon a vehicle arriving on site and these are collected and stored in dedicated battery boxes under cover and transported off site at least monthly. Liquids removed from vehicles are stored in bunded tanks on site and emptied as required. This is done a minimum of monthly. Other parts removed from vehicles (oil filters, brake pads, air bags etc.) are stored under cover and removed to suitably permitted facilities when the containers are full. Potentially resalable parts are retained on site for direct sale. Waste tyres are stored outside the buildings prior to removal from site on a six weekly basis.

Detailed descriptions of each load of waste arriving on site are recorded electronically by the site manager. This way it is easy to identify how long vehicles have been on site. At the beginning of each week the vehicles that have been on site the longest are moved to the end of rows to be processed first thus ensuring the first in first out principal is maintained.

7.2 Monitoring and controlling temperatures.

There is no active physical monitoring of the temperature of the waste piles but site staff are continually monitoring the piles for any obvious signs of raised temperatures. Out of hours the site is remotely monitored via the CCTV cameras by a security firm based in Doncaster.

By the nature of the business staff are operating within the yard area at all times during operational hours and are trained to be constantly vigilant for signs of fires. A fire watch

is carried out at the start of every day and at midday with the site manager undertaking a full inspection of the site at the end of the working day.

In hot weather extra vigilance will be paid to end-of-life vehicles with hourly inspections to ensure that temperatures of exposed metal and vehicle parts do not have the potential to cause fires. If temperatures rise to such an extent then offending vehicles will be moved to shaded parts of the site well away from other waste piles and will be constantly monitored.

7.3 Waste bale storage

Depolluted vehicles that have been stripped of all useful parts are baled on site. Bales are stored adjacent to the baler as shown in the plans in Appendix A. Bales are regularly removed and no bale remains on site for longer than two weeks. Where possible, baling of depolluted end-of-life vehicles takes place immediately prior to a load being removed from site. This timing is dependant on available space on site for the storage of vehicles awaiting baling.

8.0 Managing waste piles.

8.1 Waste acceptance

All waste arriving on site, irrespective of the carrier, undergoes an initial inspection of the load by site personnel.

When the material has been accepted, the driver is directed to off load the vehicle in the appropriate area of the site. For end-of-life vehicles awaiting depollution this is the concreted area adjacent to the depollution shed, for depolluted vehicles this is the dismantling area and for vehicle parts this is the storage building. As the vehicle is unloaded site staff re-assess the material to ensure that there is nothing in the load that does not comply with the site permit. At this stage, they also check to ensure that the load is not hot or present any fire hazard. Non-permitted items are either loaded back onto the vehicle to be taken away or placed in the quarantine areas awaiting further assessment.

8.2 Waste pile size

The height of stockpiles of material at the site is kept to a minimum wherever possible and there is a rapid turn-around of material on site.

All vehicles are stored on the ground in rows two vehicles wide. There is significant distances between the rows as the large site area allows this. Tyres are stored in the open yard area well away from other combustible materials and bales are stored close to the baler. Spare parts removed from vehicles are stored on racks inside the main warehouse building. Batteries, in dedicated battery boxes, are also stored within the warehouse building.

The largest waste pile size is the un-depolluted end-of-life vehicles in rows. While there may be several rows, they are more than 6 metres apart from each other. At its maximum extent each row will be no more than 50 metres long, 8 metres wide and 2 metres high. A maximum pile size of 800 cubic metres. Each row would contain a maximum of 50 vehicles.

Waste pile locations are shown on the attached drawing WL/BLY/FPP/01.

Other maximum waste pile sizes (all measurements are length x width x height):

- Tyres – 50 cubic metres (5m x 5m x 2m)
- Bales – 50 cubic metres (5m x 5m x 2m)
- Batteries – 8 cubic metres (4m x 2m x 1m)
- Depolluted end-of-life vehicles – 400 cubic metres (20m x 10m x 2m)

8.3 End of life vehicles

Vehicles that have been classified as end-of-life are stored on concrete surfacing with drainage systems prior to depollution. Parts are removed and stored on racking in the main storage warehouse. There is a rapid turn-around of vehicles when they have been classified as end-of-life and depolluted. No vehicle shell remains on site for longer than 4 weeks.

All vehicles are stored in rows with a maximum depth of two vehicles to ensure that the emergency services have access to at least one side of every vehicle.

8.4 Waste stored in containers.

Batteries are stored in battery boxes under cover adjacent to the depollution area. These boxes are able to be moved by forklift trucks in the event of an incident. The large site area ensures that they can be moved away from a fire if it is safe to do so. Waste liquids are retained in dedicated containers adjacent to the depollution rig in a small area which is bunded. These tanks are also bunded to ensure that the bund can hold 110% of the capacity of the largest container within the bund.

9.0 Preventing fires spreading.

9.1 Separation distances

Separation distances are maintained on site between individual piles or racks of material. This is aided by the large site area.

There is at least a 6 metre separation between potentially combustible liquids and any piles of waste or other hazards.

All combustible waste piles have a separation distance of 6 metres from other waste piles and the site perimeter and the buildings.

Individual rows of vehicles are separated by a 6 metres gap and access is always maintained so that each vehicle is accessible from at least one side. Each row of vehicles is no more than 2 vehicles wide.

Out of hours all mobile plant is parked up more than 6 metres away from any waste material.

9.2 Fire walls and bays

There are no fire walls or bays on this site.

10.0 Quarantine area

The quarantine area for this site is in the south-west corner. There is sufficient space to store all of the combustible waste material in the largest waste pile in this area while still allowing access to all areas of the yard for site staff and the emergency services. It is also well away from the main storage areas.

There is a separation of at least six metres between the quarantine area and the site perimeter as well as any other individual waste piles.

The quarantine area is rectangular in shape. The rectangle is 50 metres long and 20 metres wide giving an area of 1000 square metres.

The largest waste pile for fire prevention purposes is the end-of-life vehicles awaiting depollution which has a base of 800 square metres. The quarantine area is, therefore, is more than adequate to hold 50% of this largest pile either in volume or density.

11.0 Detecting and suppressing fires.

11.1 Detecting fires

During operational hours the site has a staffing level such that any fires would be quickly detected and remedial action could be taken if necessary.

Out of operational hours the site is monitored remotely using the network of CCTV cameras. A fire on site would be quickly detected and site staff and the emergency services notified.

Any fire on site would be considered an emergency and the fire service would be contacted as a matter of course by site staff during operational hours. The nearest fire station, operated by Nottinghamshire Fire and Rescue Services is on Vesuvius Way, Worksop which is less than 4 miles by road from the site. Fire Service personnel could be on site in less than 10 minutes following a call to the emergency services.

11.2 Suppressing fires

The designated incident controller, when appraised of a fire on site shall ensure:

- The emergency services are notified of the incident and its severity;
- Site senior management and technically competent managers are notified of the incident and requested to attend site if out of hours;
- The gates controlling water flow from the drains on site are closed at the sites fence line.

Fire extinguishers are available within the buildings and around the yard areas in the unlikely event that a fire occurs. Small fires can also be dealt with using the sites own mains water.

12.0 Dealing with a fire on site and the aftermath

12.1 Firefighting techniques

In the event of a fire the most senior member of staff on site would act as incident controller to deal with the situation.

To prevent an incident escalating and to reduce the spread of fire, there is a possibility to move unburnt material with the machines to an alternative area of the site, preferably the quarantine area. The initiation of this action would be taken by the incident controller and would always consider the safety of the employees. The assessment as to the feasibility of moving unburnt material would consider

- The safety of the operator inside the machine;
- The direction of the smoke;
- The heat of the fire;

- The means of escape for the operator;
- The likelihood of the machine catching fire due to radiated heat.

In the case of a small fire there is the option of using one of many fire extinguishers placed around the site to attempt to bring it under control. Again, the factors relating to the health and safety of the operatives must be taken into account and at no point should a site operative compromise his health and safety.

There is only one access point to the site as shown on the attached plans but this gives access to all areas.

Stockpiles of vehicles are positioned on site so that access to each individual vehicle is possible from at least one side.

12.2 Water supplies

The largest waste pile on site, end-of-life vehicles has a maximum volume of 800 cubic metres. This is made up of a maximum of 50 vehicles. As one vehicle requires 1,800 litres of water to extinguish it, this pile would require 90,000 litres of water.

The nearest fire hydrant to the site is some considerable distance away and would not be feasible as a water source.

There are two tanks on site, located between the site entrance and the parts storage warehouse, which contains 50,000 litres of water each. The tanks are made of durable plastic and are enclosed so loss due to evaporation is not an issue. Nevertheless, a weekly inspection of the tanks is undertaken by the site manager to ensure that they are always full and there are no obstructions which would prevent access. The tanks have been adapted so that the fire and rescue service can connect their hoses to this water source.

The tanks on site can provide the 90,000 litres of water required to extinguish a fire in the largest waste pile.

12.3 Managing fire water

This site is flat, fully concreted and bunded throughout. The permitted area covers 77,400 square metres. A bund of 10 centimetres will therefore be able to contain 7,740 cubic metres of water which is the equivalent of 774,000 litres. This is comfortable more than the 90,000 litres of water required to extinguish a fire in the largest waste pile.

Following a fire on site specialist contractors would be employed to remove the contained fire water to a suitable off-site disposal facility.

12.4 During and after a fire

Aveita Limited have access to other permitted facilities. In the event of a fire at this site incoming vehicles and parts could be diverted to one of the other facilities immediately, or to other facilities in the area outside the control of the permit holder and associates and continue until such time as it is deemed acceptable to recommence waste acceptance at the site.

In the event of a fire, site staff will be made available to contact local residents and businesses to make them aware of the situation. Deployment of staff will be at the site management and emergency services discretion. Should evacuation of the surrounding area be necessary then site staff would be in place to assist this process as well as to provide site specific information to the emergency services.

The Environment Agency will be informed of any fire on site within 4 hours of the incident.

Following any incident any fire damaged waste will be removed from site for handling and processing at another site. Any fire damaged property will be repaired or removed from site as necessary. Any clearance of debris from the site, including clearance of access routes will be undertaken before the site is declared fit for operation again. The tank will be emptied, and the contents removed for treatment at a suitably permitted facility. The site will not re-open without the agreement of the Environment Agency and the fire service.

13.0 Staff training

All site staff are trained in the site operating procedures, maintenance procedures, the use of fire-fighting equipment and emergency plans, including this fire prevention plan. A copy of this plan is retained in the site office and all staff are aware of its contents and where the plan is kept.

Refresher training and updates are given to site staff quarterly and the effectiveness of the training is tested through six monthly fire drills. This ensures that all members of staff are aware of their roles in the event of a fire on site, that they are able to identify and use the correct fire extinguishers and that evacuation procedures are followed.

All training is documented, and the records are available for scrutiny on site. Each member of staff has their own training record where specific training sessions are documented.

14.0 Continual Improvement

Aveita Ltd are dedicated to continually improving site operations through investment and modification in staff and infrastructure. This Fire Prevention Plan is due for review before the end of January each year. The next review is to be carried out prior to 31st January 2026. Any amendments made to this plan will be sent to the Environment Agency for their consideration and incorporation.

APPENDIX A – DRAWINGS

Drawing No. – WL/BLY/FPP/01 Site layout plan