



# Mayflower London

Fire Prevention Plan

June 2023

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 WI28-01a – Site Maintenance Manual  
 WI28-02 – Procedure for Managing Contractors  
 WI57-24 – Permit to Work Procedure (Hot Works)

# Mayflower London

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 Company Name: Mayflower Hygiene Supplies (London) Ltd  
 Site Location: 208 a&b Westminster Industrial Estate,  
 Warspite Road,  
 Woolwich,  
 LONDON  
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1	June 2023	FPP for permit application	DLM	JH	

# 1. Introduction

## 1.1 Purpose

This document represents the Fire Prevention Plan (FPP) for the Mayflower Waste Transfer Station at Woolwich, see Site Location Plan, **Appendix A**.

The FPP outlines how PHS will meet the fire prevention objectives, namely:

- Minimise the likelihood of a fire happening;
- Aim to extinguish any fire within 4 hours;
- Minimise the spread of fire within the site and to neighbouring sites;

## 1.2 Guidance

In developing the FPP the following guidance detailed within Table 1 below has been used:

Table – List of Guidance	
Document Reference	Title
Application Form Guidance EPB	'How to apply for an environmental permit Part B: New permit guidance notes – 5d Fire Prevention Plans'
Guidance document	Fire Prevention Plans: Environmental Permits
Waste 28 -WISH	Reducing Fire Risk at Waste Management Sites

# 2. Waste Activities

## 2.1 Summary of Waste Activities

The site will accept and store a range of wastes from both Healthcare (Human) and Non-healthcare settings. A detailed list of these wastes is provided, see **Appendix H** - Permitted Waste Types.

Mayflower will only accept waste collected from its own or PHS customers at this site. Waste activities on site will be limited to the following:

- 1 - Repacking of waste prior to disposal
- 2 - Storage of waste in appropriate waste containers pending collection for treatment or recovery (R13) or disposal operations (D15) elsewhere.
- 3 - Compaction of offensive waste in purpose-built soft compaction sealed units.

To ensure that all wastes collected are correctly classified according to their hazard, placed in the appropriate waste stream and that wastes for which the site is not permitted are prevented from being collected, a pre-acceptance audit will be carried out in accordance with the requirements set out in;

- Healthcare wastes: Appropriate measures for permitted facilities,
- Chemical wastes: Appropriate measures for permitted facilities, and
- Non-hazardous and inert wastes: Appropriate measures for permitted facilities

No waste collections may be scheduled without completion of a waste pre-acceptance audit, where required.

The only treatment of waste that occurs on site is the compaction of offensive waste, carried out in dedicated soft compaction vehicles (SCVs.) The operation is carried out frequently to ensure the waste is retained on site for the shortest possible duration before being treated. Even in exceptional circumstances, where we have vehicles off the road or waste is received late on a Friday, this is unlikely to extend beyond 7 days.

## 2.2 Waste Storage Location

The location of all wastes stored on site is indicated in the Internal Site Layout Plan - **Appendix D**. The location of specific waste consignments will be identified using the electronic waste tracking system.

### Internal Storage

All wastes handled by the site are stored within suitable receptacles to prevent fire, escape or vandalism, see **Section 2.3**; Clinical and offensive wastes are stored within lockable euro waste carts, colour coded or tagged to ensure that the waste is easily identifiable. Hazardous wastes are stored in rigid containers and bulked by type. Limited quantities of washroom consumables waste will be stored on site. Waste packaging (paper, cardboard etc) and WEEE is placed in IBCs or palletised pending collection for recovery.

The site will also hold stocks of consumable products for supply to customers. These items are all stored in sealed packages in a designated stockroom separate from the waste storage area.

### External Storage

Where the Permit allows, offensive wastes may be stored outside the building in lockable 1100litre euro waste carts. The carts will be placed in a designated location, see **Appendix B**. Clinical and hazardous wastes will not be stored outside the building at any time. Trade wastes generated by the site e.g. from kitchens or offices, may be stored outside the building in appropriate secure containers.

### Storage of waste on vehicles:

Generally, vehicles parked up on site overnight would be empty. No waste will be stored on site on vehicles except;

- as a means of facilitating the imminent transfer of waste off-site, or
- in the event of an unexpected breakdown where the waste is held temporarily on the vehicle prior to unloading, or
- in the event of an unexpected shut-down of a disposal or recovery site where the vehicle may be required to park up fully loaded overnight as a temporary measure before discharging the load the next day or diverting to an alternative waste facility.

## 2.3 Waste Fire Risk Review

A review of the fire risk has been carried out for the waste types most frequently accepted onto site, see table below. The most significant fire risk is from arson or contamination of the waste with rogue items:

Waste*	Form	Ignition Risk	Risk of Spread	Method of Separation	Potential Ignition Source
<b>Offensive Waste</b> 180104, 200199	Solid wastes containing around 40% moisture, in sealed bags	Low	Low	Bags stored in separate 1100ltr Euro Waste Bins either inside or outside the building. Bins are located in close proximity to other Euro Bins containing the same waste	Arson Waste Contamination
<b>Sharps</b> 180101	Solid waste, in rigid plastic containers	Low	Low	Waste placed in 770ltr UN Euro Waste Bins, stored in close proximity to other Euro Bins of clinical waste.	Arson Waste Contamination
<b>Aerosols</b> 160504, 160505	Canisters placed in a sealed, vented UN container.	Medium	High	Drums are stored 4 per pallet and are placed in a designated, segregated away from ignition sources and combustible items	Arson Waste Contamination Damage due to mishandling, spillage
<b>Batteries</b> 160601, 160602, 160603, 160604, 160605, 200133, 200134	Batteries are separated by type (alkaline etc) and sealed in plastic 60 ltr UN container	Medium	Medium	Drums are stored on a pallet and placed in a designated, segregated location away from combustible items	Arson Waste Contamination
<b>WEEE</b> 200135, 200136	Individual items are palletised or placed in IBC	Low	Low	Stored in a designated area in proximity to other non-hazardous wastes	Arson Waste Contamination
<b>Paper and card packaging</b> 150101, 200101, 150103	Palletised or IBC	Medium	Medium	Placed in a designated, segregated area in proximity to other non-hazardous wastes and away from ignition sources	Arson Waste Contamination

Plastic packaging 150102	Palletised or IBC	Low	Low	Placed in a designated in proximity to other non-hazardous wastes	Arson Waste Contamination
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\* a complete list of EWC codes is provided ref. Appendix H, Permitted Waste Types

## 2.4 Waste Volume and Capacity

The total volume of waste stored on site at any one time will not exceed 6 tonnes (0.75 tonnes of non-hazardous healthcare and offensive wastes in containers, 1.3 tonnes of hazardous wastes in containers and 1.1 tonnes of other wastes.) A detailed breakdown for each waste type is provided, see **Appendix H** - Permitted Waste Types.

With the exception of electric vehicles parked up for charging, waste collection vehicles (3.5 t vans) will not be parked on site overnight. Occasionally, vehicles (3.5 t vans) may be parked on site pending repair or recovery, however no waste will be left on any of these vehicles.

All vehicles left on site overnight will be locked, be parked in the dedicated parking area or charging area, see **Appendix B**.

## 3. Receptors

### 3.1 Receptor Identification

All vulnerable receptors will be evaluated using on-line tools e.g. DEFRA MagicMaps, EA Flood risk mapping etc., and by cross-referencing Google maps, see **Appendices E and F**. These receptors will be considered when identifying and managing fire prevention systems, processes and plans for the site.

### 3.2 Receptor Location Plans

Local receptors are identified on a to-scale map of the location see **Appendix F**. In order to focus on those most likely to be impacted in the event of a fire on site, an initial 1000metre buffer zone from the facility boundary has been used and an assessment carried out to evaluate the wind conditions in the area, see **Appendix G**. This identifies the most predominant wind direction and wind speeds and becomes a factor in preventing the spread of any fires both on site and to neighbouring premises. The receptors that may be affected and the actions that we will take to protect them in the event of a fire on our premises are detailed see **Appendix F**. PHS maintains public liability insurance to the amount of £10 Million to cover clean up and remediation costs.

## 4. Preventing Fires

### 4.1 Arson or Vandalism

The site is controlled and operated by PHS. Access to the site is via a locked gate. As a minimum, a monitored intruder alarm has been installed to deter intruders and minimise the risk of arson events. Where the alarm is triggered or suspicious activity has been identified out of hours, nominated key holders will be notified automatically by the monitoring company and attend site to investigate. Where required, the emergency services will be contacted for assistance.

### 4.2 Plant and Equipment

The only plant / equipment that will be operating on this site is as follows:

**Soft Compaction Vehicles (SCV)** – All SCVs are subject to a daily inspection by the vehicle driver via a daily defect reporting system and are monitored in transit via our vehicle telemetry system. A formal Preventative Maintenance Inspection (PMI) is completed by a qualified external contractor every 6 weeks. A 12-month statutory (LOLER) inspection is completed on the SCV bin lifting equipment.

All SCVs are fitted with a 5kg powder fire extinguisher to deal with any fires before they take hold.

**Large Goods Vehicles (Trunkers)** – All trunkers are subject to a daily inspection by the vehicle driver via a daily defect reporting system and are monitored in transit via our vehicle telemetry system. A formal Preventative

Maintenance Inspection (PMI) is completed by a qualified external contractor every 6 weeks. A 6-month statutory (LOLER) inspection is completed on the tail lift equipment.

All trunckers are fitted with a 5kg powder fire extinguisher to deal with any fires before they take hold.

**3.5t Small collection vehicles** – All small collection vehicles are purpose-built for the transportation of waste and are checked daily by the vehicle driver via a defect reporting system and are monitored in transit via our vehicle telemetry system. All vehicles have compartments for separating the different waste types and are fitted with a 2kg powder fire extinguisher to deal with any fires before they take hold. When not in use, all vehicles will be locked and parked in the dedicated vehicle parking area.

**Forklift truck (FLT)** – The FLT is used to facilitate the movement of packaged wastes where palletised for efficiency e.g., 205litre drums of waste aerosols are transported 4 per pallet. FLT's are leased from an approved supplier and maintained as per PHS Site Maintenance schedule. A 12-month statutory (LOLER) inspection is completed on the FLT. When not in use the FLT is parked up in the designated parking station adjacent to the FLT charger.

No other plant, equipment or machinery will be operating in or near the waste storage buildings.

## 4.3 Infrastructure and Site Inspections

The site and site infrastructure will be maintained in accordance with the PHS Site Maintenance Manual to meet legal, regulatory and permit requirements. The manual details the maintenance requirements and their frequencies. A full list of approved contractors is available on the company intranet and in the site maintenance folder. Infrastructure specific to this waste transfer station includes: -

**Fire Alarm System** – This will be inspected annually by a BS 5839 approved contractor, with a weekly test carried out by the Site Manager / Competent Person.

**Smoke and heat detectors** – These will be BS 5839-1 approved and installed & maintained by a UKAS accredited contractor.

**Fire Extinguishers & Fire Blanket** – Will receive an annual service / inspection in accordance with BS5306 by an approved contractor. A visual check will also be completed quarterly by the Site Manager / Competent Person.

**Emergency Lighting** – Will be serviced annually by an approved contractor, with a monthly test carried out by the Site Manager / Competent Person.

**Intruder Alarm** – These will be BS EN 50131 approved and maintained by an accredited contractor to ensure the system is maintained in an efficient working order

**Portable Appliance Testing** - All portable (non-I.T.) equipment used by the site with a plug attached will be inspected on an annual basis and any I.T. equipment tested every 2 years. Any new portable equipment will be appliance tested before use.

**Fixed Electrical Testing** - The Site Manager will arrange for fixed electrical inspections to be completed every 5 years by a competent NICEIC certified electrician.

**Drainage/Interceptor** – During the site inspections, the Site Manager will check daily that all drains are free of materials likely to cause blockages e.g., leaves, litter etc. In addition, the Site Manager will ensure that no trade effluent or substances that are hazardous to the environment e.g., diesel, vehicle wash detergent etc., can enter the surface water drains. Where the site has an interceptor, this will be inspected by an approved contractor at intervals as given in the PHS Site Maintenance file.

**Shutter Door** - All shutter doors will be serviced annually by a qualified contractor to ensure that they remain in full working order and are safe for use.

**Site Access Gates** - The Site Manager will carry out a monthly inspection on the site access gate ensuring it is maintained in good working order

**Pest Control** - A British Pest Control Association approved pest control contractor has been appointed for the waste transfer station. The number of bait boxes and the frequency of service visits will be determined by the amount of pest activity detected.

**Maintenance of Boundary Vegetation** – an approved, authorized contractor will carry out grounds maintenance at

suitable intervals to cut back any overhanging trees / branches and overgrown vegetation.

**Site Cleaning/Litter Picks** – To prevent litter from accumulating/ blowing around site, litter picks will be completed throughout the day and again before the end of the day which will include a pick at the site boundaries. (The site inspection may also identify specific areas of non-conformance which may require an increase in cleaning/litter picking frequency).

**Site Inspections** - All permitted sites will complete site inspections as per the PHS Site Diary Requirements and Inspection Checklist, to ensure that permit requirements and mitigation measures implemented on site are maintained. Records of all service, maintenance and inspections will be kept in line with documented company procedures.

## 4.4 Fuels or Combustible Liquids

No fuel will be stored or used on site.

Oils are stored in the original packages or suitable UN Approved containers and placed on suitable secondary containment. Oils will be stored away from any source of ignition and other waste piles pending collection.

All vehicles will be maintained as per PHS fleet procedures. Should a vehicle leak fuel/oil whilst at the waste transfer station, trained spillage response personnel will activate the spillage response procedure. This will involve assessing and isolating the spill and obtaining the correct equipment to deal with the spill. If the spillage cannot be dealt with safely by the site or is too large (i.e., a ruptured vehicle fuel tank) then the receptors on site such as the surface water drains will be protected with portable bunding/drain covers and our Emergency Response contractor (Adler & Allen) will be contacted to deal with the spill. All contaminated materials from the spillage response will be suitably packaged and placed in the quarantine area until removed via an authorised waste contractor.

The site manager will complete site inspections at least twice daily which will include a check for leaks of fuel, oil or effluent from vehicles. Their findings and any remedial actions will be recorded using the PHS Site Diary Requirements and Inspection Checklist.

## 4.5 Electrical Faults

All electrical work on site will be carried out by a competent NICEIC certified electrician and Minor Work Certificates will be held on site for all works that have been carried out. The electrical installation will be inspected on a 5-year frequency in accordance with BS7671 and as per the PHS Site Maintenance Manual. In addition, all portable appliances will be tested annually to ensure that they remain in a safe condition.

## 4.6 Ignition Sources

Principle sources of ignition will be managed as follows:

**Electrical Installations and Portable Electrical Equipment** – All electrical installations and portable electrical equipment will be maintained and any damage identified by the managers daily inspection will be investigated and corrected. All electric vehicle charging points installed on site will be fitted with fire suppression devices as standard.

**Arson** - The site has out-of-hours monitoring and maintained intruder alarms, along with smoke and thermal detectors in the waste storage building **see Section 5.5**, that will alert the monitoring company who will in turn notify the nominated keyholder in the event of an incident

**Naked Lights / Flames** – Naked Flames / lights are not permitted on site

**Open Burning** – Not permitted on site under any circumstances

**Hot Works** – No hot works will take place whilst there is combustible waste inside the waste storage building. Only when the waste storage building is empty of all combustible materials will any hot works, including cutting and grinding, be allowed to proceed. All hot works will be managed under the PHS Permit to Work system, which will ensure that suitable and sufficient risk assessments are provided, the work is carried out by competent contractors under supervision and there is a fire watch conducted following the completion of works. Where insufficient time/resources are available to perform a fire watch, a hot work permit will not be issued, and the work will be deferred to another day.



The site manager will complete a site-specific risk assessment before the commencement of any hot works, including a focus on the location of the hot works.

**Discarded smoking materials** – Smoking is only permitted in the designated area, see Site Layout Plan **Appendix B**. Failure to adhere to this policy will result in disciplinary action being taken against the offender.

**Neighbouring Site Activities** – Neighbouring sites are predominantly commercial operations e.g. food production, furniture sales and small art & craft workshop spaces. These sites are unlikely to generate an ignition source unless in the event of a major incident, in which case Mayflower will enact its own emergency plans and business continuity arrangements.

**Incompatible Wastes** – We will not collect any wastes that, due to their incompatibility, would react if stored together. Pre-acceptance audits will be completed, as required by the various appropriate measures for permitted facilities, to ensure we are permitted to accept the waste that our customers' present to us. In addition, where non-conforming wastes are identified as part of our drivers pre-acceptance checks made at the point of collection, our employees are instructed to reject the waste.

**Vehicle exhausts** – Vehicles will unload wastes parked in separate bays. To mitigate any risk of hot exhausts causing fires, the following precautions will be taken:

- i) All vehicles operating within or near the Site Buildings will be required to shut off their engines once they have completed their manoeuvre;
- ii) Idling is prohibited and will be monitored via our Masternaut vehicle telemetry system;
- iii) Drivers will always be required to stay with their vehicle;
- iv) Vehicles will be moved to the dedicated vehicle parking area in the yard once the loading/un-loading process has been completed (typical turnaround time is less than 20mins);
- v) All vehicles are inspected daily by the driver for defects and a periodic inspection is carried out by an external contractor;
- vi) The site manager will conduct a fire watch as part of his site inspections (am / pm and end of day) and will take immediate action where any non-compliance has been detected.

**Light fittings and fixtures** – Lighting inside the waste storage buildings is LED (reducing potential to provide an ignition source) and will be visually inspected via the Site Managers daily inspection to identify any defective/damaged fixtures or bulbs. Lighting circuits will be inspected every 5 years during the electrical installation inspection.

## 4.7 Heat and Spark Prevention

**Vehicle exhausts** – Vehicles will unload wastes parked in separate bays with precautions put in place to mitigate any risk of hot exhausts causing fires

**Office Equipment** – All office equipment will be switched off when the site is un-occupied and will be maintained in accordance with the manufacturer's guidelines.

**Gas Supplies** – All gas appliances are subject to annual inspection from a GasSafe certified contractor.

**Hot Works** – See 4.6. All hot works will be managed under the PHS Permit to Work system.

## 4.8 Flammable Items

Stocks of consumables and other products intended for supply to our customers are also held on site, some of which are flammable e.g., hand sanitisers containing alcohol, solvent based fragrances, aerosol canisters etc. These items are supplied in their original packaging and are stored pending delivery in a designated secure area, separate from the waste storage area.

Where these items are returned to site as wastes, they are placed in their original packages into suitable UN Approved containers. These containers are then placed in a designated, segregated storage location away from any source of ignition and from other waste piles, pending supply or collection, **see Appendix D**.

## 5. Reducing the Impact of a Fire

### 5.1 Waste Acceptance

**Permitted Wastes** - A pre-acceptance check will be carried out at the point of collection to ensure the waste presented is as expected. Where non-conforming waste is found, the PHS collection operative is instructed to reject the load. This will ensure that wastes for which the site is not permitted are prevented from entering the waste stream.

**Incompatible/Hot loads** - See **Section 4.6**, we will not collect any wastes that, due to their incompatibility, would react if stored together. However, if this waste is not discovered until it has been unloaded at the waste transfer station, then the waste will be placed into a lockable euro-waste bin, moved to the quarantine area and recorded in the non-conforming waste log. An authorised waste contractor will be contacted to assess the waste and remove it for disposal at a permitted facility. In addition, all instances of identified non-conforming wastes are followed up with the relevant customer and services are suspended where repeat offences occur.

Hot loads detected during the waste transfer process will also be quarantined and monitored for 24 hrs.

### 5.2 Waste Piles

All permitted waste will be stored in its largest form (i.e., the same condition that it is collected from the customer.) Separate storage areas will be created for each category of waste (offensive, hazardous etc.) Wastes will be stored in UN Approved containers or other appropriate packages and placed in piles within the designated, separate storage area. Each storage area will be clearly marked to ensure adequate separation distances are maintained between the different piles, see **Appendix D** – Internal Site Layout Plan.

-offensive waste pile	1.3m (H) by 4.2m (L) by 2m (W)	(equivalent to 6x1100 litre eurobins)
-sharps waste pile	1.3m (H) by 1.3m (L) by 0.8m (W)	(equivalent to 1x770 litre eurobin)
-hazardous waste pile	1m (H) by 4m (L) by 1.2m (W)	= 4.8m <sup>3</sup>

Each offensive/sharps waste container has a lockable lid therefore restricting the ready supply of oxygen to the waste. The waste itself is not inherently combustible as it naturally contains organic material and moisture, and there are no sources of ignition in the vicinity in the waste transfer or storage area, see **Appendix D**.

#### Separation distances

To reduce the risk of fires spreading, we will maintain separation distances of;

- 2m between the building boundary and the perimeter of the waste storage area;
- 2m between the different waste storage areas; and
- 1m between each waste pile within the designated storage area, see **Appendix D**
- Where the above cannot be achieved, fire walls or flame-proof containers will be used.

The waste storage/quarantine areas will be clearly marked and employee training, toolbox talks and the manager's daily inspections used as a means of ensuring that these rules are adhered to. Each waste storage bin is also wheeled which will allow that bin to be easily removed from its location if combustion or other non-compliance is detected. In the event of an emergency the waste containers may be wheeled out of the building to be placed in an isolated part of the site, although remaining within the permitted area.

As separation distances of 6m cannot be achieved within the waste storage building due to space constraints, the additional fire prevention measures identified will mitigate this risk and ensure fire prevention objectives are achieved.

#### Quarantine:

A dedicated quarantine area will be created within the Waste Storage building and Waste Permitted Area, see **Appendix D**, that is 50% of the size of the largest waste pile;

Volume of the largest waste pile	= 6 x 1100 litre eurobins	= 6600 litres or 6.6m <sup>3</sup>
Area of the quarantine waste pile	= 3 x 1100 litre eurobins	= 3300 litres or 3.3m <sup>3</sup>

The quarantine area will be used to store non-permitted and non-conforming wastes. Non-conforming wastes will predominantly consist of glass and metal items such as glass bottles, cans etc. These items will immediately be placed into lockable eco-locs prior to placement in the Euro waste bins waiting disposal. A record of the volume and description of any wastes stored in the quarantine area will be made daily. An inspection of the Quarantine area will be completed by the site manager during their site inspection – am/pm and end of day.

All Quarantined waste will be removed from site a minimum of once a week. Collection frequencies will increase if volumes of quarantined waste increase and this will be monitored by the site manager.

We believe that this provides sufficient provision for the volume of non-permitted wastes we may receive. Where we need to move waste bins into the quarantine area, this will be done so manually.

#### Fire Walls:

Where separation distances of 6m cannot be achieved within the waste storage building, wastes will be stored in flame-proof containers or fire walls in the form of concrete blocks placed 3 high providing a flame-proof barrier 1.8m high between waste storage areas will be used.

### 5.3 Waste Storage Duration

Wastes are received daily and will be stored on site for the minimum possible period of time. Waste containers will be removed by PHS' own fleet of collection vehicles or an approved, authorised waste contractor a minimum of once per week. Only minimal quantities of wastes will be held on site over the weekend as most service drivers will have transferred their waste before the waste transfer station has been serviced for final disposal.

Other wastes will be serviced weekly. Some wastes e.g., packaging, aerosols, etc., may be held on site longer but only in order for there to be a sufficient quantity for a collection to be made.

In normal conditions, a waste collection will ensure that all waste of that type is removed from site. If this is not possible, the containers will be collected on a first in-first out (FIFO) basis. Where waste cannot be collected in accordance with the minimum collection frequency or cannot be removed in its entirety, we will evaluate the waste to ensure that it does not present any hazard, implement contingency measures to ensure that the maximum storage volume is not breached, carry out a thorough investigation to determine why the minimum collection frequency was not met and implement additional measures to ensure there is no re-occurrence.

Where seasonal demand increases the collection of wastes from customers, we will ensure that collections from site are increased at the same proportion to ensure that there is no increase in the maximum volume of waste stored on site.

### 5.4 Monitoring of Wastes

All waste movements will be recorded using the waste tracking system to ensure storage capacity is not exceeded. A record of the quantity and the reason for any waste remaining on site at the end of each day is also kept.

Pile sizes and the correct segregation of wastes will also be monitored via the waste tracking system and Site Diary Requirements and Inspections checklist, see also **Section 4.3**. This check will validate the permit requirements, confirm that the maximum capacity of the site is not exceeded and that waste has not been stored for an extended period of time.

If non-conformances are found during the monitoring process, then the Site Manager will carry out a full investigation and record the results on the Site Diary Requirements and Inspection Checklist indicating what actions have been taken to prevent re-occurrence.

### 5.5 Smoke and Heat Detection

The site is covered by a UKAS accredited monitored fire alarm system compliant to BS EN54 Part 2&4 with automatic Smoke and Heat detectors inside the waste storage building to identify any abnormal increases in heat or smoke within the storage locations. This will send an immediate alert to the monitoring company who will immediately notify the site management team, allowing the responsible persons to promptly attend the site and

evaluate the incident. Where required they will notify the emergency services, unlock the access gate to allow emergency services access to the site and make themselves available to manage the consequences of an incident so that the responsibilities and requirements detailed in this plan are discharged.

The company responsible for the service and maintenance of these systems maintains UKAS accreditation and appropriate industry certifications

## 5.6 Actions to Limit Self-Heating

Offensive waste generates small amounts of heat when stored but is unlikely to ever get above 32°C - this limit was identified on the basis that a waste treatment plant in the Midlands which processes this waste into RDF has thermal imaging and 32°C is the highest temperature they have ever recorded for waste stored on site either before or after processing.

All waste stored within the buildings is in individually locked euro-waste bins or other dedicated waste containers, limiting the available oxygen for any self-combustion. Waste will be transferred from site promptly to prevent the build-up of any heat and to reduce the maximum pile sizes stored on site.

The waste storage buildings are well-ventilated and the containers are stored in areas away from direct sunlight.

## 5.7 Fire Suppression and Containment

As detailed in this plan, the waste stored on site is mostly offensive wastes contained in waste packages and a small quantity of other wastes. The hazardous wastes will be stored inside suitable UN Approved containers.

The offensive waste will be serviced by SCVs which have a sealed fireproof internal container capable of containing a fire for 45 minutes.

Other wastes will be stored in limited quantities and will be retained in their original packaging or suitable UN Approved containers. All such wastes will be stored away from any source of ignition and other waste piles, pending collection.

The site has accredited and monitored intruder and detection systems, **see Section 5.5**. The nominated emergency key holders are selected based on their travel time to the site and will respond promptly upon notification of an incident or an emergency on site to assist the emergency services in preventing the spread of and extinguishing any fire within four hours, see **Section 6.2**.

Fire Extinguishers are located in the waste storage area, see **Appendix D**, so that small scale fires can be easily suppressed and extinguished. In addition, a BS7944:1999 compliant heavy-duty fire blanket measuring 3m X 3m and capable of a 4-hour fire containment will be provided, large enough to cover and suppress a fire in one of our 1100 litre euro-waste bins (1.3m x 1.0m x 1.4m) or 770 litre euro-waste bins (1.3m x 1.3m x 0.79m.) The procedure for the deployment of the fire blanket and fire extinguishers will be as follows:

- i) The fire blanket will be held in a dedicated receptacle and located to ensure easy access from the waste storage and quarantine area and the fire extinguishers will be positioned as shown on **Appendix D**.
- ii) The fire blanket and extinguishers will only be used where the fire is small enough that deployment will not expose staff to the risk of burns i.e., only where there are low level flames or smoldering
- iii) The fire blanket will only be deployed where there are at least 2 members of staff, allowing the blanket to be un-rolled and placed safely over the fire
- iv) Fire blankets and fire extinguishers will only be used by staff trained to do so and the effectiveness of the emergency response procedure will be continually assessed via the 6 monthly exercises as specified later in **Section 7.2** of this plan.

If a fire occurs out of hours, it is unlikely that there will be two members of staff on site so the fire blanket can only be deployed by the emergency services.

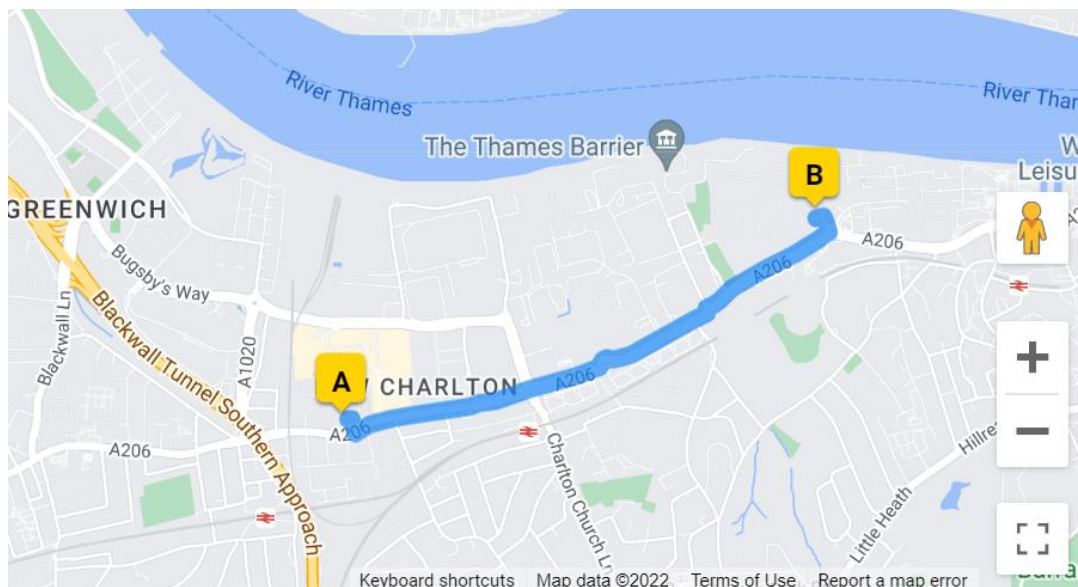
With these measures in place, we do not believe that automatic suppression systems like sprinklers would be

proportionate to the risk associated with the nature and scale of our waste management activities at this site. See also **Section 4.6**, re electric vehicle chargers.

## 5.8 Active Fire Fighting

### Provision for Emergency Services:

London Fire Brigade are located 1.2 miles away at East Greenwich Fire Station (A), with an estimated travel time of 5mins (AA Route finder) to Mayflower London (B.) The main access route for the emergency services to the site is along the A206 onto Warspite Road. Plumstead Fire Station is 2.2miles away and crews could reach the site in 9 mins.



### On-site Response:

The waste storage building is designed with 2 large shutter doors and 2 fire exits through which access for emergency services and any staff seeking to fight a fire can be made.

PHS has firefighting and spillage control equipment available at several locations throughout the site, see **Appendix D**, and available for staff to use, either to control a fire where it is safe to do so or to aid them in safely evacuating the building.

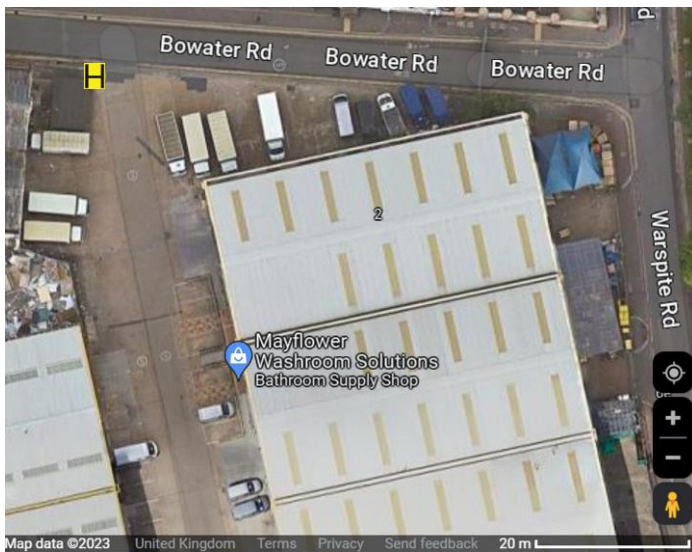
The site will have a minimum of 2 fully trained fire marshals capable of using fire-fighting equipment and supervising staff in the event of a fire. It will be the fire marshals' responsibility for deciding the actions to be taken in the event of a fire but in normal circumstances the process will be:

- 1) If the fire is small scale and there is little risk of it spreading then the on-site fire-fighting equipment will be used to tackle the fire in its current location
- 2) If there is a significant risk of the fire spreading, and if it is safe to do so, then combustible materials will either be moved away from the source of the fire, or the source of the fire will be moved away from the combustible materials (whichever operation is the safest.) This will be carried out manually by pushing the relevant wheeled waste bin to a safe area where there is no risk of fire spread
- 3) If it is neither safe to move the source of the fire or the combustible materials, then the emergency services will immediately be contacted and the emergency plan activated.

Consideration will be given to the type of waste that is on fire before acting, however waste that is being held in the quarantine area that has not been evaluated prior to a fire will not be tackled under any circumstances. Any wastes derived from a fire will be placed into a eurobin, evaluated and removed from site via an approved authorised waste contractor.

## 5.9 Water Supply

The site has one fire hydrant available, located at the junction with Bowater Road, see below;



The diameter of the hydrant and its rated output are not known. However, based on the National Guidance Document for the provision of Water for Fire Fighting (appendix 5) – <https://www.water.org.uk/wp-content/uploads/2018/11/national-guidance-document-on-water-for-ffg-final.pdf> and the size of the industrial estate on which the site is situated (>3 hectares) we would expect that the available water pressure would be 75l/s or 4500 litres per minute which exceeds the 2000 litres per minute benchmark cited in the FPP guidance by 150%.

Based on our maximum pile size of 6.6m<sup>3</sup> we are of the view that the water supply available is enough to tackle any fire that is likely to occur on site.

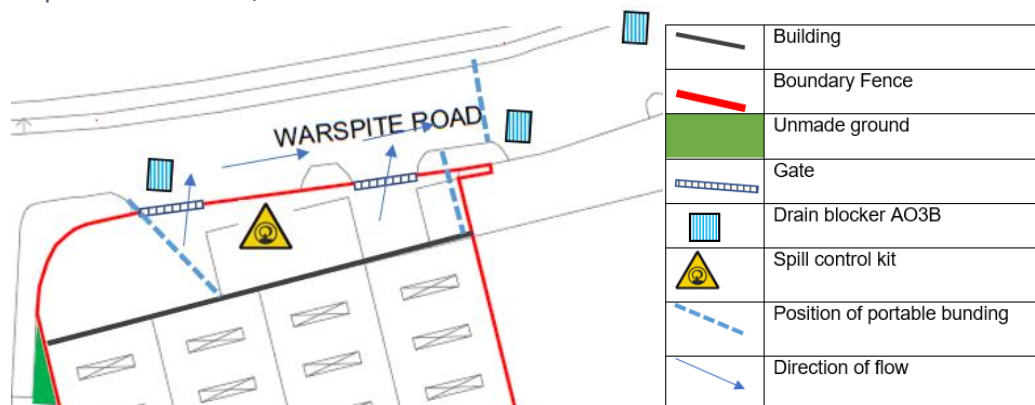
### 5.10 Fire Water Containment

Our maximum waste pile relates to the offensive waste that we will store on site. Based on the Environment Agency guidance of a water supply of at least 2,000 litres a minute for a minimum of 3 hours for a 300 cubic metre pile of combustible material we estimate that approximately 8m<sup>3</sup> of fire water would be created from tackling our maximum pile size.

An agreement in principle has been sought from Thames Water, they have advised that they cannot consent us to divert the fire water down the foul drain. A provisional containment plan has therefore been put in place for the site, as shown below;

#### Firewater Containment Plan:

We will aim to capture and contain any fire water with a pump and a 10,000 litre Bladder Tank, held on site in case of an emergency. The yard has no curb and so fire water cannot be held on site. However, the on-site portable spillage kit will also contain AO3B drain blockers and portable bunding which will be deployed to direct any runoff to the collection point at the drain;





Note: The Portable Bunding is 100mm high, made of crush resistant foam and our supplier ([www.newpig.co.uk](http://www.newpig.co.uk)) has confirmed that a full impermeable seal can be obtained without the use of a sealant.

To manage any pollution incident, the site has secured an emergency response arrangement with a specialist contractor (Adler and Allan) to assist the response and the clean-up for the situation. They also have the capability to provide tankers, pumps and temporary tanks, absorbent and PVC booms to create barriers for containment and to absorb oils leaving site. They can install mobile oil water separators, inverted weir dams etc. in existing water courses or freestanding on site if required. Flood barriers and Hydro sacks (like sandbags) can be deployed to create containment areas. All these measures are available as tools to be used, the application of which will depend entirely on the scenario and the suitability at the time.

With these provisions we believe the risk to surface water receptors is managed.

## 6. Contingencies For and During a Fire

### 6.1 Emergency Action Plan

The emergency action plan will be activated without delay if one of the following events occur: -

- A fire is confirmed on site
- An uncontrolled event occurs which could reasonably be expected to lead to a fire on site.

### 6.2 Emergency Contacts

**Andy Shukla** – Keyholder #1

Tel: **07890 312584**

**Jamie Phipps** – Keyholder #2

Tel: **07930 867445**

**John Haddow** - Group Quality, Environment and Safety Manager

Tel: 07590 784376

The site manager or his deputy will make a telephone call to each of the relevant emergency services (see table below).

Emergency Service	Telephone Number	Distance from Site
East Greenwich Fire Station	999 /0208 555 1200	1.2 miles
Queen Elizabeth Hospital	999 /2028 836 6000	1.8 miles
Plumstead Police Station	999 /0207 230 1212	2.4 miles

*Note: the order in which each service is called will be dependent on the nature of the incident.*

The Environment Agency will be contacted on 0800 80 70 60 after the emergency services.

### 6.3 Action to be Taken in the Event of Fire

Immediate actions to be taken in the event of a fire are as follows:

1. Small fires may be tackled by employees on site with available firefighting equipment if it is safe to do so;
2. For large fires or where a fire is not safe to be tackled by employees, the relevant emergency services in the table above will be notified of the incident by dialing 999 and the following information provided:
  - Location of Incident – **Mayflower Washrooms Solutions**  
208 a&b Westminster Industrial Estate, Warspite Road, Woolwich, LONDON SE18 5NU
  - Details of the Incident
  - If any staff are known to be missing
  - Where the arriving first responders will be met (in a safe location, away from any smoke plume with all relevant information on the details of the incident and a copy of this plan)
3. In the event of the alarm system being triggered out of hours, the Site Manager/Deputy will be notified via their

mobile device. Key holders will attend site within 15minutes to unlock the site, review the situation and allow the emergency services access to the site if required

4. Any drivable vehicles that can be accessed safely will be removed off site to prevent escalation of the incident
5. Any moveable wastes or products that can be safely accessed will be removed from the affected area and relocated to a safe area
6. The site will immediately be closed to any further movements of wastes until declared by the emergency authorities to be safe to reopen
7. All incoming waste will be diverted to one of the nearest Waste Transfer Stations either:

:PHS Camberwell, 66 Wells Way Camberwell SE5 7UA

:PHS Wickford, Fulmar Way, Wickford Business Park, Wickford ESSEX SS11 8YW

8. The businesses that are in the immediate vicinity of our premises (see table below) will be notified either by phone or in person: -

Company Name	Telephone Number	Address
F & D Copeland & Sons	0208 854 8101	Units C & D, Warspite Road SE18 5NU
SMP Group	0208 8855 5535	Siemens Road, SE18 5NU
Crest Furniture	0208 854 4229	Siemens Road, SE18 5PH
The Reach Climbing Wall	0208 855 9598	Bowater Road, SE18 5NR
Thameside Studios	0208 301 8844	Harrington Road, SE18 5NR
Print Studios	0208 316 5522	Harrington Road, SE18 5NR

9. All other receptors that are detailed in **Appendices E and F** will be contacted as required, dependent on the scale and impact of the fire.

## 7. Communication and Testing of the Fire Prevention Plan

### 7.1 Communicating the Fire Prevention Plan

PHS recognises the importance of ensuring that the fire prevention plan is communicated and understood by all relevant stakeholders and will therefore take the following actions:

- 1) All members of staff will receive training in regard to the sections of the fire prevention plan relevant to their role placing particular emphasis on how to prevent fires and the actions that need to be taken in the event of a fire
- 2) All contractors will be provided with a copy of the fire prevention plan prior to the commencement of any works on site and will be required to confirm acceptance of its requirements via the Pre-start Contractor Checklist – WI28-02b. Contractors RAMS will be reviewed to identify any potential fire risks associated with their works and how they propose to mitigate them
- 3) The Site Manager will monitor staff activities to ensure that the specified controls in the FPP are adhered to and staff will be retrained where non-compliances may occur
- 4) An up-to-date hard copy of the Fire Prevention Plan will be made available in the Visitors' File located at reception (part of the 9 folder management system);
- 5) An up-to-date electronic copy of the Fire Prevention Plan will be available via the company Intranet Document Centre so it can be accessed off site.

### 7.2 Testing the Fire Prevention Plan



Live Drills / Simulation exercises will be carried out every 6 months to test our fire prevention plan and measure the effectiveness of our emergency response procedures. To ensure that the measures in the fire prevention plan will be effective in the event of a fire, the exercise will review:

- 1) Measures that will be taken in the event of a fire occurring on our largest waste pile
- 2) Measures that will be taken in the event of a fire starting internally and how to protect combustibles from the fire i.e., moving of any fire items into / out of the quarantine area, use of fire blankets and other fire-fighting equipment
- 3) Measures that will be taken to ensure that fire water does not enter the drainage system i.e., deployment of drain protectors and bunds.
- 4) Fire prevention measures including confirming the daily turnover of waste, the storage conditions of the waste, a check on the availability and serviceability of firefighting & spillage response equipment.

After each exercise, a review will be carried out to evaluate the effectiveness of the response and details of all corrective actions taken will be recorded.

## 8. Meeting Fire Prevention Objectives

### Minimise the likelihood of a fire happening:

- Good housekeeping (including prevention of the build-up of combustible materials) will be maintained by the site and monitored via daily inspections by the site manager;
- An annual review of the Fire risk assessment will be completed for the whole site including the waste storage buildings with prevention measures and emergency planning reviewed;
- At the end of each day, the site is cleaned down and a fire watch will be completed by the site manager, confirming any waste stored on site is sufficiently cooled;
- All site infrastructure will be inspected and maintained to ensure the building meets all fire safety regulations, permit requirements and prevents any un-authorized access to site;
- Monitored security systems and secure internal waste storage buildings will reduce the risk of arson;
- A daily site diary recording all events and actions completed by a Technically Competent person will confirm that housekeeping regimes have been implemented minimising fire risk;
- The bulk of any stored offensive waste contains around 40% moisture meaning these waste piles are essentially always wetted down, therefore reducing any risk of self-combustion;
- No flammables and or accelerants will be stored or used near to any waste storage areas;
- Vehicles will be maintained to reduce the risk of exhaust heat as an ignition source. Vehicle engines will be switched off whilst transferring waste or when stationary;
- No hot loads will be accepted at this site;
- All hot works will be managed under the permit to work system;
- All waste is containerised and managed in small piles (individual 1100ltr or 770ltr bins with an average waste weight per bin of 80kg and 52kg respectively) with a frequent turnover;
- The buildings are well ventilated and waste bins are not stored in direct sunlight therefore limiting self-heating;
- Periodic visits and annual audits are completed by the PHS Health, Safety and Environment team to ensure full compliance to health, safety and environmental legislation at the site;
- We will not collect any wastes that are incompatible and would create a reaction if stored together. All waste is always stored in the correct containers with lockable lids;
- Staff will be trained on site housekeeping and waste storage procedures to ensure all risks are managed.

### Aim for a fire to be extinguished within 4 hours:

- Automatic Smoke and Heat detectors in the waste storage building provide the fastest alert for site management and for emergency services;
- Firefighting equipment (Fire extinguishers and Fire blanket) is available inside each of the waste storage buildings to enable small and safe to manage fires can be extinguished (see internal layout plans for location of all firefighting equipment present at site);

- Provision of trained personnel on site during operating hours who can use the fire-fighting equipment provided
- The availability of staff / management living near to the site (15 minutes) will allow staff to arrive on site in good time to aid the emergency services;
- All waste bins are mobile (wheeled) and can be removed from the area if safe to do so, therefore reducing fuel sources or isolating any waste bin on fire;
- All safety devices and emergency kits are inspected and maintained to ensure that detection and emergency equipment is always available and is always fit for use;
- Access gates and doors (shutter door) will be inspected and maintained for firefighting and emergency team quick access;
- The waste bins will be stored in a location where they can be easily tackled / removed (front waste storage building adjacent to shutter doors).

**Minimise the spread of fire within the site and to neighbouring sites:**

- Waste will only be stored in wheeled bins in small quantities (1100ltr or 770ltr bins each containing an average waste weight per bin of 80kg and 52kg respectively) or UN Approved containers with separation between each waste pile;
- Wheeled bins will be used to facilitate the removal of waste from the building if there is a risk of fire spread and if safe to do so;
- Building infrastructure such as shutter doors will be maintained meeting all current building regulations to prevent any spread of fire from site;
- Grounds maintenance including cutting back of any vegetation, hedges, trees and overhanging branches will be completed regularly.
- Trained Fire Marshalls and Firefighting equipment (Fire extinguishers and Fire blanket) will be available in the waste storage building to immediately extinguish small and safe to manage fires (see internal layout plans for location of all firefighting equipment present at site);
- The site manager will conduct a fire watch as part of his daily site inspections and will take immediate action where any non-compliance has been detected;
- Automatic smoke and heat detection will provide the fastest possible alert for site management and emergency services out of hours.