



Fire Prevention Plan
Reference: EMS-FPP-05-v8

Environmental Permit - FP3599LH

Casbrook Park
Romsey
SO51 0PG



Fire Prevention Plan

Document Reference: EMS-FPP-05

Issue Number: 8

Issue Date: 04-02-26

DOCUMENT CONTROL SHEET

Version Reference	Date	Reason for Change	Issued by
V2	March 2019	Schedule 5 Notice	ARC
V3	March 2021	Update for Permit Variation	SMcN
V4	February 2022	Update in Line with infrastructure and layout changes	SMcN
V5	February 2023	Minor updates to revise bunding areas and containment	SMcN
V6	August 2023	Updated to reflect new Transfer Station building	LD
V7	February 2024	Updated as per EA request	LD
V8	February 2026	Updated to reflect permit variation	SMcN

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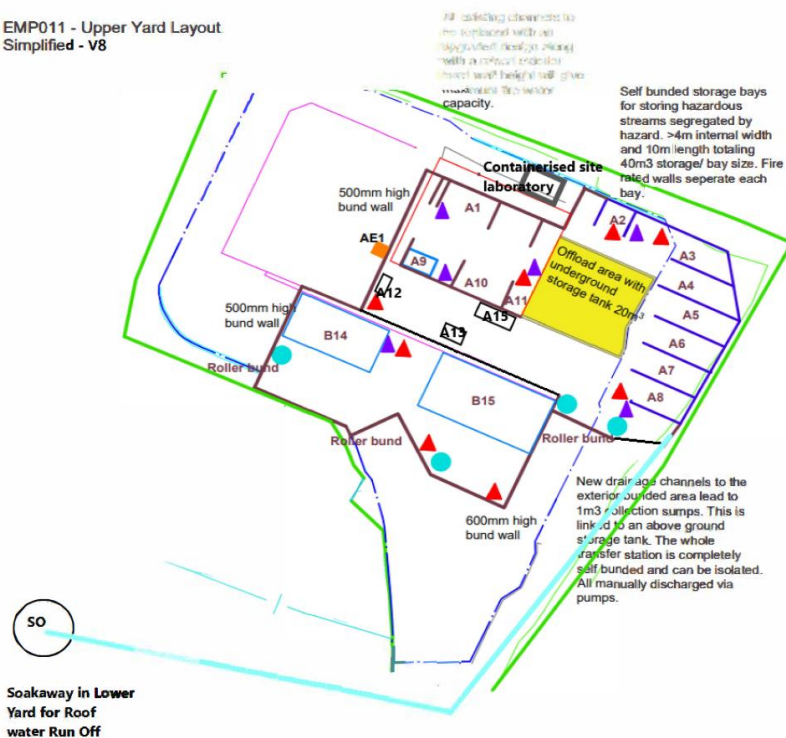
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The site is divided into three main areas which will be covered separately. For detail and photographs on specific storage areas, buildings or photographs of the site then please refer to supporting document BKP-SO-Appendix 1 - Hazardous Waste Secondary Containment by Site Area for Waste Storage

EMP011 - Upper Yard Layout
Simplified - V8



A1	Battery sorting area
A2	Toxic 20m³
A3	Flammable solids 40m³
A4	Alkali 40m³
A5	WEEE storage 40m³
A6	Acid 40m³
A7	Non / low haz 40m³
A8	Flammable liquids 30m³
A9	VOC LEV cabinet
A10	Waste reception - 24 pallets
A11	Oxidisers - Max 8m³
A12	Gas cylinder cage - 2m³
A13	Aerosol cage 12m³
B14	Unwashed container storage
B15	Plastic washing and granulation plant
●	1m³ collection sump
▲	Spill kit
▲	Fire extinguisher
AE 1	Emissions point VOC cabinet for repacking - LEV
A15	Outbound load container

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	ANNEX A: DRAWINGS OF SITE - BKP-FPP-V4-01 (LOWER AND MAIN YARD), BKP-FPP-V4-02 (TRANSFER STATION), INDIVIDUAL MAPS OF EACH FIRE CONTAINMENT AREA A-D (SEPARATE ATTACHMENTS).....	ERROR! BOOKMARK NOT DEFINED.
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1 INTRODUCTION

This document provides the Fire Prevention Plan for the Waste Installation at Casbrook Park, Bunny Lane, Romsey, SO51 0PG. BKP Waste & Recycling Ltd is part of the GRG Waste UK Ltd group of companies which operate a number of hazardous waste transfer and treatment facilities across the UK.

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 in order 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. Local conversations between the operator and dialogue with the Fire brigade are ongoing.

1.2 Scope

This FPP has been prepared in accordance with Environment Agency guidance.¹ It covers combustible wastes that are collected as part of the operator's business.

However, the guidance does not apply to the storage of wastes that are hazardous (excluding WEEE but including hazardous waste batteries accepted as a separate waste stream). Nor does it apply to liquids. The storage of hazardous combustible wastes is considered within this.

The scope of the FPP therefore covers the following wastes that are currently accepted at the site:

- Non-hazardous waste such as cardboard, metal and plastic (storage, separation and treatment), small quantities of waste tyres and absorbents
- WEEE (all categories)
- Batteries (all chemistries)
- Hazardous packaged wastes

The site operates a hazardous waste transfer facility as well as repacking of hazardous waste streams. Transfer and repacking of waste is completed in the lower and upper yard within

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

designated areas as per the site plan. The top yard and transfer station accepts a wide range of hazardous waste streams and stores them within segregated fire proof bays. Within the lower yard a narrow range of predominantly oil and oil contaminated or garage related waste streams are received and stored. The site has a treatment plant in the lower yard that treats waste liquid oils and water within a designated tank farm bund. Within a separate bunded area in the upper yard (B) there is an IBC reuse and waste plastic washing and granulation facility. The site bulks, repacks and blends liquid waste streams from smaller containers into larger containers to enable cost effective disposal as part of this permit variation within the top yard. This is completed within an LEV cabinet (A9) where appropriate within the hazardous waste transfer station. The site is permitted to sort a small quantity of mixed batteries by chemistry to enable their cost-effective disposal, no treatment of batteries other than hand sorting takes place. These have been described in broad terms for completeness.

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 site is located at Casbrook Park, Bunny Lane, Romsey, SO51 0PG.

The site is accessed via Bunny Lane.

The site is in a remote, rural area. The nearest residential property is over 200m from the site.

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

The nearest fire station is at Romsey, which is 2.8 miles from the site.

The site is divided into three operational areas as follows;

- Top Yard (A) – Hazardous Waste Transfer Station (two buildings, one constructed in 2024, one much older original building – Both portal frame non-combustible clad (old building is asbestos roof, new building all steel clad), LEV bunded cabinet for washing or bulking materials with high VOCs within original building. The new transfer station building is used for storage only of waste within segregated concrete bays with fire walls between each bay. The new transfer station is covered by infrared cameras. The buildings where waste is stored are fitted with fire detection systems and fire alarms in each storage bay. There is an onsite laboratory adjacent to the original transfer station

building that is equipped with new fume hood, XRF, Calorimeter, spectrophotometer, wet chemistry techniques, compatibility testing equipment and ancillary lab equipment.

- **Plastics Recycling Area (B)** – This bunded area constructed in 2023 consists of a portal frame steel building 20m (l) x 10m (w) x 6m (h) that houses plastics reconditioning and recycling equipment. There is a wet granulator process for washing and shredding plastics unsuitable for reuse and an IBC washing and testing line. All material is shredded in a wet environment with continuous cold-water flow. The whole area is bunded with sealed drainage. Materials to be processed are stored away from the building during non-operational hours in designated area marked on site plan. The building is fitted with fire detection and CCTV which is monitored as part of the site out of hours.
- **Main Yard (C)/Lower Yard (D)** – Main Yard - Waste Oil treatment within vessels inside tank farm bund, packaged waste storage in separate bunded bays, waste oil storage in bulk tanks, repacking of hazardous wastes such as contaminated wipes and absorbents or oily sludges, weighbridge, associated surface water treatment tanks and infrastructure

The Lower Yard is only used for waste treatment and storage of waste oils, Oils and waters and solids, some hydrocarbon impacted solids. These are non-combustible wastes.

Combustible wastes such as oily sludges from tank bottoms or oil contaminated rags / absorbents are also stored in the lower and main yard area in containers. Oily rags are stored within ventilated metal shipping containers in the lower yard. Some oil contaminated absorbents are repacked into a bulk storage bay prior to export to third party recovery facility in walking floor trailers (D9)

The hazardous waste transfer station is located within a building which has a clear area surround of at least 6m. Half of the transfer station is within an existing steel portal framed asbestos roof building; the rest of the storage bays are within self-contained concrete bays with pre-cast concrete panel fire rated walls in a steel portal framed structure. Each of these bays has self-contained sealed drainage system. The whole of the transfer station area has self-contained drainage for capturing of any surface run off if individual container bunds are breached. This tertiary containment bund spans the perimeter of the transfer station and is designed in accordance with CIRIA 736 and there is a large roller bund in and out of this area for vehicles to access (HGVs and FLT).

1.5 Roles and Responsibilities

The Site Manager has responsibility for ensuring these procedures are adhered to. The site manager is specifically responsible for:

- Ensuring the adequate training of staff and contractors working on site regarding the content of these procedures. Ensuring all contractors are fully inducted and aware of

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the permit to work system and the site rules (the plant and maintenance manager will be responsible for managing contractors on a day-to-day basis)

- Ensuring the continued testing and maintenance of the Fire Alarm systems.
- Ensuring the adequate provision of resources such as personal protective equipment (PPE).
- Ensuring the provision and maintenance of hand-held fire extinguishers and other firefighting equipment at the site is adequate.
- Ensuring that the Fire Prevention Plan remains accessible at the site at all times. For this, the plan will be kept on the noticeboard in the site office where it will be readily available.
- Completing daily walk-round checks (or one of the other operational managers in their absence) to monitor waste streams temperature with a thermal imaging camera likely to be a risk of self-heating. These streams are identified in the walk-round check sheet.
- Ensuring all CCTV and remote access equipment is maintained and in good use for monitoring the site whilst it is not manned, this includes all thermal imaging cameras.

The Site manager works closely with the HSEQ Manager and the wider GRG compliance team to ensure site compliance is prioritised. The HSEQ and Site Manager complete regular internal audits to ensure actions are addressed and followed up as well as monthly H&S meetings across the site

Table 1 below covers the staff who will be working daily at the facility. All operational staff will be trained and understand the fire prevention plan. In addition to this they will be trained to tackle fires where safe to do so, understand the permit to work and hot works systems to ensure processes are followed and reduce fire risk.

Table 1 – Staff onsite

Staff Position	Responsibility	Number onsite	Competency
Managing Director	Overall responsibility for BKP	1	CoTC, NEBOSH
Site Manager	Responsibility for compliance and management of the facility in line with Environmental permit,	1	COTC, Degree Chemist, DGSA, Fire Marshall, IOSH Managing Safely, RPS



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	Health & Safety & Internal operating standards		
GRG Technical Director	Technical lead for GRG Waste UK	Remote	Chemistry MSc, CoTC, DGSA, RPS
HSEQ Manager	Managing all HSEQ aspects at site. Organising training and reporting across the site	1	NEBOSH General Certificate
GRG Operations Manager	Oversees all site operations and Site Manager reports into them	1	Chemistry Degree, IOSH, 15 Years hazardous Waste experience
Site Chemists	Responsible for day to day chemist responsibilities as directed by senior site chemist. Responsible for checking and sampling loads and completing paperwork and lab analysis, responsible for compliance and labelling of incoming and outgoing waste	2	Chemistry Degree
Senior Site Chemist	Responsible for checking material into the site for treatment to	1	Chemistry MSc, Fire Marshall, RPA

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	ensure compliance with the permit, running treatment processes, completing paperwork and using the onsite weighbridge, Managing team of chemists onsite and overseeing testing and laboratory		
Site Supervisor	Managing team of operatives, performing some daily checks on vehicles and FLT's, supervising loading and unloading of vehicles, supervising contractors where appropriate	1	Fire Marshall
Site Chemists	Deputised duties from TCM, Responsible for pre-acceptance, booking loads out to third parties, managing storage, and treatment, sampling waste	2	Chemistry BSc, IOSH, Fire Marshal
LTP Operatives	Safe running and operation of plant and equipment. Driving	2	FLT/Telehandler/Confined space trained, banksman



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	FLT/Telehandler, loading / unloading vehicles		trained, Chemical awareness trained
Transfer Station Operatives	Safe running and operation of plant and equipment. Driving FLT, loading / unloading vehicles, wrapping pallets, repalletizing wastes	2	FLT, Internal training, IOSH working safely, banksman trained, Chemical awareness trained
Transport Manager	Managing transport fleet, vehicle compliance	1	Transport Manager CPC
Office Staff	Office functions, accounts, payroll, invoicing, sales, technical	5	Various, DGSA x 1, First Aiders, 2 x different COTC holders weekly, 2 x Degree qualified chemists

Table 1 – BKP Staff and responsibilities

1.6 Process Overview & Plant and Equipment

The site is divided into three main areas which will be covered separately. For detail and photographs on specific storage areas, buildings or photographs of the site then please refer to supporting document **BKP-SO-Appendix 1 - Hazardous Waste Secondary Containment by Site Area for Waste Storage**

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EMP011 - Upper Yard Layout
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Figure 1 – Upper Yard Layout (A is transfer station, B is plastics recycling area)

Upper yard - BKP-FPP-V5-01 Upper Yard (A/B)

The upper yard main bunded area (A) hazardous waste transfer station where mixed hazard materials are accepted, analysed and stored prior to transfer offsite. This is for packaged hazardous wastes only and has individual bunded storage bays segregated by fire walls and custom fire curtains. The offload area (shown in yellow) has it's own self-contained drainage and each of the storage bays has their own self-contained drainage system with a sealed sump in the back of each bay.

The site does not accept skips or other bulk loads of non-hazardous or combustible wastes such as wood / paper or card, compost etc in the upper yard. BKP now do not run any dry waste vehicles other than 1 for a specific contracted customer which is tipped directly at a third party and no wastes are accepted of this nature from third parties.

Small quantities of waste tyres or other combustible non-hazardous wastes may be received through the transfer station. They are generally transferred offsite fairly quickly after receipt and the site does not handle any significant volume routinely.



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Waste electrical equipment of all WEEE categories is received at the facility. All WEEE excluding refrigeration & LDA is received as POPs waste and treated as such. WEEE has its own designated storage area as identified on the site plan (A5) with segregated drainage. The storage bay has custom fire curtains from floor to ceiling above the pre-cast concrete panel walls.

Only hand dismantling of WEEE equipment is completed onsite and no shredding / mechanical treatment other than with hand-tools is completed (including battery removal or other hazardous component removal prior to recycling). All WEEE received is sent to licenced AATFs for further treatment other than large WEEE items that may be hand-dismantled into component parts to recover separate fractions and then those fractions sent to AATFs or other recycling routes as appropriate.

Batteries are received at the facility as sorted single streams from producers or as mixed batteries from a variety of collection points/producers. The site only checks and sorts batteries to ensure their safe storage and recovery in small volumes.

Batteries will be sorted and checked by hand as detailed in TS-ABTO-01-Sorting Mixed Batteries, TS-ABTO-11-Battery Handling and Safety. Sorted fractions will be packed in accordance with best practise and current European Recycler and ADR/IMDG guidance.

Sorted dry cell Alkali, Zinc Air, Lead Acid, Ni-Cd, Ni-MH present the lowest risk of self-ignition unless they are damaged or trailing leads / incorrect packing is present to allow short-circuit. Only sorted batteries that are packed correctly will be put into storage in bay A5 until shipping to UK recycler. Wet cell batteries (industrial Ni-Cd or Pb) are stored in their designated corrosive bay until being shipped to UK ABTO/ABE to ship to end recycler.

Batteries are not stored at the facility for any length of time with a target of under 1 month.

Lithium metal or lithium-ion batteries received at the site are checked prior to storage in drums in inert packing material in accordance with ADR inside ventilated shipping containers within the lower yard. These containers are banded and protected by fire rates blockwork walls on each side. Their location is such to minimise risk of a fire spreading to other combustible materials stored onsite and achieve maximum segregation.

All batteries received are checked and repacked upon receipt prior to being put into storage. Any mixed batteries that cannot be fully sorted that day are stored in the lithium container as worst case for storage. All drums will be opened to check for trailing leads and drums will be checked by thermal imaging for any hot-spots if they cannot be sorted immediately.

Waste hazardous and non-hazardous packaging (HDPE predominantly) will be washed and recycled. Containers suitable for reuse may be reused, those unsuitable will be washed and shredded simultaneously to make a clean granulate suitable to be used as a replacement for virgin raw materials. The process involves the wet shredding of material in dilute caustic environment, reducing the risk of increased heat / friction and also of chemical incompatibilities occurring. pH of the washing solution is monitored by inline pH probes and the process is batch ran and overseen by site chemists. All waste is thoroughly checked at the point of pre-acceptance by a HNC qualified Chemist (or above) and materials are excluded based on their properties if unsuitable.



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Unsuitable materials like ex those that spontaneously ignite in air or emit flammable gases in contact with water are routed to alternative treatment providers and routed using the company's pre-acceptance procedure. Highly toxic or malodorous materials are also excluded from this process. The acceptance criteria is available, in the document "Hazardous Packaging Acceptance Criteria" submitted as part of the latest Permit Variation and uses the hazard statements in addition to chemical incompatibilities for the technical assessor to assess from datasheets supplied by the waste producer. This is available within the BKP electronic management system. Flammable materials may be accepted for pre-treatment within the extracted cabinet to remove hazards prior to recycling or reuse.

All material received at the site is thoroughly checked by one of the Site Chemists and analysed where required in the onsite laboratory. The Site Manager is also a chemist. Any material batched for the process is done by chemists and they ensure all containers are nominally empty to prevent the risk of unwanted reactions.

The machinery used to complete this is a high-speed wet granulator. It is a granulator that is supplied by manufacturer and is continually fed with water whilst material is added via a conveyor. The knives of the granulator spin and shred material through a screen whilst it is simultaneously washed. Once material has passed through a screen it drops onto another auger where it is washed again with clean water, the material then passes into a friction washer which removes labels and any stubborn contaminants before it passes into a high-speed drier. The drier removes paper labels and dries the plastic. Once it is dry the material is passes into 1T sacks ready to be recycled.

Only single stream polymer materials are put through this process to make single stream product. No optical sorting or further downstream processing is completed. The site typically only recycles HDPE containers unless to produce a sufficient quantity of PP as a campaign for example.

For container washing a 360 degree lance is used to wash the containers on a drip tray to ensure containment. IBCs can be vacuumed out in a drying station to remove previous hazards. Liquids are captured and then sent offsite for disposal based on their chemical properties of the previous contents.

All the water used is reused where possible and then sent offsite to a suitably licenced facility when no longer usable. Testing is completed in onsite laboratory prior. Records of all materials washed and contaminants within the waste-water are recorded.

All contaminants in the water are controlled at the front end of the process via pre-acceptance and then acceptance checks by the site chemists in a batch process.

Plastics to be washed and granulated will be stored as denoted on the site plan within a bunded storage bay.

The granulator is a fed by operatives using a feed conveyor and all of the system is ran as a wet process until the final drying stage once all contaminants are removed.

A map showing the storage locations and drainage of the materials in the upper part of the yard is attached in **EMP011-BKP-FPP-V08 -01 -Upper Yard**.



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Lower/Main Yard (C/D)

In the lower part of the site waste oil and oils and water are treated. They are treated via an oAVC units within the tank farm to remove oil for recovery. Liquids are separated and treated water or oils are tested in the onsite laboratory prior to transfer to dedicated storage tanks by pumps and then transferred offsite by road tanker.

As part of this permit variation centrifugation and road sweeper treatment have been removed from the permitted activities as the site no longer accepts these waste streams for treatment. Additional bunding and infrastructure is also included as part of this permit variation as well as application for discharging uncontaminated water from non process areas to soakaway. The equipment required for this is included within the associated documents and site plans as well as the testing requirements.

Hazardous waste liquids and solids are stored in packages in the lower yard. This part of the site accepts garage wastes so liquids are oils / antifreezes. Flammable liquids are stored within designated bunded bays within the transfer station. These locations are shown on diagram. Combustible wastes liable to ignition such as oily rags and stored in dedicated vented metal shipping containers as denoted on the plan. Particular caution regarding rags and other contaminated absorbents is paid by site walk round checks and monitoring for signs of temperature increase and auto-ignition. This is in addition to waste acceptance checks.

Waste absorbents may be stored in a storage bay temporarily after repacking (D9) prior to transfer to end disposal in walking floor trailers. This bay is equipped with 2 hour rated fire walls and thermal imaging cameras and is bunded with it's own self-contained drainage. The thermal imaging cameras are linked to external monitoring (as well as those in the transfer station covering the storage bays).

Oily sludges from tank bottoms and other oily operations are stored in packages in the lower yard. They are stored in dedicated bays covered bays away from any potential sources of ignition.

Fixed pumps and pipework installations are present in the tank farm bund. All pumps are subject to routine maintenance and servicing. Only aqueous, non-flammable liquids/sludges are received at the facility for treatment. No flammable or malodorous streams are accepted and acceptance is managed by site chemists using the onsite laboratory for testing.

All equipment is installed by qualified industrial electricians. No electrical maintenance is carried out onsite for any equipment. Daily checks of all plant and equipment are carried out by trained personnel or the plant and maintenance manager.

Lithium Primary (Metal) and Lithium Secondary (Ion) batteries will be stored in a designated metal ventilated self-bunded container segregated from all other waste within the lower yard, which has tertiary containment. The container has high level and low-level vents to prevent moisture build up and the batteries sweating. The batteries inside will be individually isolated and either packed in kiln dried sand for primary lithium or in vermiculite for secondary batteries. Steel drums with a non-conductive liner will be used for storage as these are the most effective



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in reducing the impact of a battery fires from runaway cells. Batteries may be sent to recyclers in plastic drums in accordance with ADR/IMDG.

The container is ventilated and has fire rated 1200mm x 600mm concrete blocks, 3 high placed around three sides of the container to provide additional protection and in line with section 11.2 of FPP guidance. The container will only be accessed using a pyroban forklift or pump truck although the area will not be zoned as there should not be a flammable or explosive atmosphere. The volume of Lithium primary and Secondary Batteries will be kept to a maximum working stock of 8 pallets at any given time.

The container will be monitored with a thermal imaging camera daily as part of site walk-round checks to check for any thermal runaway batteries and all batteries are stored in inert packing material (vermiculite).

Non Waste Items

The lower yard also has a white diesel tank for fuelling vehicles. It is self-bunded and properly equipped with the necessary earthing and level sensors for fuelling vehicles. It is located >10m from operations as the weighbridge that was behind it has since been replaced. It is >6m from main site offices. The capacity of this container is 10,000L. This tank can only be accessed with a key-fob and all pipework for this is specialist and designed to eliminate spills with fill-level shut offs (like a petrol station forecourt). This tank cannot be accessed by non-BKP employees and fuel taken is logged against an individual's key-fob.

There is a diesel-powered jet wash in the lower yard for cleaning. This has a small diesel tank to enable the supply of hot water. There is a diesel tank (700L) on a bunded container adjacent to the jetwash. This is serviced by qualified electricians / service engineers and the bund on which it is placed is >110% of the capacity of the tank. The jetwash is inside a locked cabinet and cannot be accessed by non-BKP employees.

The site operates with 4 forklift trucks, 1 excavator, 1 telehandler. These are subject to daily inspections by trained operatives and scheduled servicing by third party contractors in addition to LOLER testing.

The site operates a fleet of vehicles that are parked overnight at the site. There are 4 articulated tractor units, 1 x curtain sided 26T vehicle, 2 x 3.5T vehicles and 1 x skip vehicle. All vehicles are serviced and maintained in accordance with the operators licence and daily drivers inspections are completed.

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1.7 Sensitive Receptors

Sensitive receptors closed to BKP bunny lane are outlined in table 2 overleaf. The closest neighbours to the site are the HWRC next door and the former landfill that is adjacent to the facility. The site is not located within a Groundwater Source Protection Zone 1 or 2. There are no Habitats within the locality and no assessment is required under the Habitats Regulations.

Table 2 – Location of Sensitive Receptors

Receptor	Direction from installation boundary	Minimum distance from installation boundary (m)
<i>Domestic Dwellings</i>		
Residential Property	NE	210
Residential Property	N	200
Residential Properties	NE	670
Residential Properties	NW	890
<i>Industrial Premises</i>		
Yokesford Industrial Estate	N	800
HWRC	SW	65
Waste Recycling Facility	W	530
<i>Public Rights of Way</i>		
Footpath	SE	550
<i>Highway or Minor Road</i>		
Bunny Lane	E	<5
A3057 Stockbridge road	SW	1200

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Surface Water		
Stream (Casbrook)	SW	180
Timsbury Lake	SW	800
Open Space, Parks		
Park – Casbrook Common – No public access	S and SW	<5
SSSIs		
River Test	SW	1500

A map showing the location of these receptors relative to BKP is included in Annex A.

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

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2 Causes of Fire

The following have been identified as potential common causes of fire and their relevance to this site is given in Table 3

Table 3 Causes of Fire and Applicability to the Site

Source	Applicability to the Site & Risk	Specific Mitigation
Arson or vandalism	Yes – Intruders entering site and starting fires of fuel/waste materials/offices	See section 3.7 Security – Preventing
Plant and Equipment	Yes – Plant overheating, spillages from fuel and sparks, motors getting hot to ignite oil / contaminants	See section 3.8 – Planned preventative maintenance. Daily checks completed on all plant and equipment prior to use as well as scheduled servicing by specialist contractors. Housekeeping completed as part of daily checks to ensure site is clean and in good order
Self-Combustion	Yes – Self-reactive substances of those liable to self-heat or materials that may self-heat under their own weight or because of bacterial action	See 3.2.3 – Self-reactive substances stored within designated area in metal containers, small quantity stored and stock quickly rotated. Any materials liable to self-heat are identified at pre-acceptance and acceptance checks are made upon receipt. Twice daily storage checks made with thermal imaging camera to monitor temperatures. Stock is rotated quickly and not stored in direct sunlight. Any stock that may self-heat is covered and monitored by thermal imaging cameras such as all storage

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		bays in top yard and lower yard absorbents storage.
Electrical faults	Yes – Electrical faults causing fires. Faulty cabling or incorrect wiring causing fires	See 3.8 – Planned preventative maintenance. All wiring has fixed wiring inspections. Electrical work only completed by competent contractors. All cabling places in cable tray to protect from damage. Electricians checked as part of walk round checks by site management. Only fixed electrical equipment used and all equipment subject to fixed wiring inspections or COMPEX inspections as appropriate by qualified electricians. PAT testing carried out annually for portable equipment.
Discarded smoking materials	No	Smoking only permitted in site smoking shelter which is >10m from any operational areas. All contractors/visitors are inducted. Clear signage around the site
Naked Lights	No	None onsite
Hot and Dry Weather	Yes – the site is not shaded by trees or other infrastructure and gets full sun for the majority of the day	Flammable, self-heating and oxidizers shall not be stored in direct sunlight. If the temperature exceeds 25C, then in addition to the standard 2 x daily checks with thermal imaging camera a further temperature check shall be made. The storage bays in the transfer station have been designed and orientated so that shade is provided for the bays for storage of all materials out of direct sunlight.
Gas Cylinders	Yes – Cylinders / Aerosols or other pressurised	See 3.2.3 – Flammable gases only stored in metallic vented

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	containers with flammable gas may cause fire or create explosive atmospheres	containers (aerosols) or upright in cages with valves protected segregated from oxidising materials >6m in accordance with "Guidance for the storage and treatment of aerosol canisters and similar packaged wastes" Aerosol canisters stored in ventilated metal container within metal ventilated containers.
Hot Works Onsite	Yes – Hot works may create sparks from cutting / welding / grinding which may spread to combustible materials if not properly managed	See 3.10.2 – Hot Works. Only hot works completed in accordance with permit to work and hot works permit. Designated areas onsite identified as low risk by site management to be used if hot works are to be completed. Only competent contractors to complete hot works under supervision
Open burning onsite or on adjacent sites	No – No burning onsite of any material	All staff trained that this is not a permitted activity
Damaged or exposed electrical cables	Yes – Damaged cables can cause electrocution and fires	See 3.8 – Planned preventative maintenance. Cable trays and cable checked as part of weekly checks. Only electrical work onsite completed by competent external contractors
Reactions between incompatible materials	Yes – Potential incompatibilities in treatment causing exothermic reactions leading to fire	Covered in individual process documents. All material is checked, and compatibility assessed to ensure no incompatible reactions in line with appropriate measures guidance. All operations are of extremely low risk due to process controls and nature of materials presented i.e. Oil and water, Articles (batteries), empty packaging. Any

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		processing for plastics completed in wet alkali environment to reduce risk of incompatibility or heat generation. Any mixing or blending completed in controlled environment after extensive testing in laboratory and desktop assessment within bunded area by HNC qualified chemists (See associated documents (BKP-SOP-18, BKP-LAB-13)
Hot Loads	No	All loads received are subject to pre-acceptance analysis prior to receipt. Hot loads would not be agreed by technical assessors to be suitable to the site. All loads received onsite are inspected and sampled by site chemists. Thermal image cameras cover all offload areas
Leaks and Spillages	Yes - Combustible/Flammable material may be moved around site leading to ignition and fire	Yes – See 3.10.5 Leaks and spillages
Fuel	Yes – Fuel onsite could initiate fire spreading to storage areas	Fuel is stored onsite in a self-bunded steel tank. The tank is >6m from the offices and >10m from any operational areas. It is protected from damage by barriers and has a key fob system and specialist dispensers to prevent static, sparks and overfilling of the fuel tanks of vehicles. Any spillages of fuel would be cleaned up immediately and there is a fuel spill kit adjacent.



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3 FIRE PREVENTION PLAN

3.1 Site Plan(s)

The site plan is shown on two drawings. **EMP011-BKP-FPP-V08 -01 -Upper Yard** and **EMP011-BKP-FPP-V08-01 -Lower Yard** to show the Top Yard and Packaging Recycling Area and the Main/Lower Yard layouts. This shows all storage and treatment areas and bunding. Additional information on bunding and capacity is included in this document and associated Annex 2 as well as within **BKP-SO-Appendix 1 - Hazardous Waste Secondary Containment by Site Area for Waste Storage** which is for showing segregation and containment of process and storage areas from non-waste activity permitted areas.

3.2 Material Receipt, Treatment and Storage

3.2.1 Pre-acceptance

As this is a hazardous waste facility, there are detailed pre-acceptance procedures followed to ensure material received at the site is compliant with the site permit and appropriate measures guidance. Where appropriate samples are obtained in advance to confirm suitability of acceptance through the onsite laboratory or a third-party treatment site or accredited laboratory. Material will only be approved into site with a confirmed onward treatment route with appropriate caveats and acceptance checks required. The Technical Assessor will be responsible for confirming the onward disposal routes and assessing the material against the site permit and in line with appropriate measures guidance. Quotes will only ever be converted once all the necessary information is received. Once the necessary pre-acceptance has been issued a booking form will be issued to the customer for them to complete and return and arrange a collection / delivery date subject to site capacity. Deliveries will only be confirmed by onsite operations team subject to capacity and bookings can only be made once this is agreed.

3.2.2 . Waste Acceptance

Waste is only received at the facility if the necessary pre-acceptance information has been gathered and it has been booked in and approved by the Site Manager, Group Operations Manager or Senior Site chemist in their absence. The lists will be passed electronically with the necessary technical information on the materials to be received prior to bookings being agreed. The nature and composition of the waste material will allow the team onsite to allocate storage capacity based on the limits agreed. Completed booking forms must be received from the customer / producer prior to material being collected or received onsite.



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Upon receipt into the site the material is checked against the pre-acceptance information by the site chemists. Material received is added electronically to a spreadsheet which forms a live stocklist for the site showing the below

- Nature of waste – Solid/Liquid/Sludge
- Number and Type of containers – 205L, 60L etc and Qty
- EWC Code
- Chemical composition
- Date of receipt
- Producer
- HP codes
- Intended disposal route and costings for that route
- Consignment Note code
- Internal Unique Reference Number
- Storage location

Waste is checked as outlined on the technical sheet of the job pack which details the testing that is to be completed on each waste type to verify the pre-acceptance information. Some of this may only be basic visual checks for e.g. in the case of articles.

The onsite laboratory located in a custom metal building adjacent to the transfer station is equipped with the following testing equipment. It has fixed gas supplies installed and tested by installers annually;

Karl-Fisher auto-titrator for water content determination

Parr Bomb Calorimeter for determination of calorific Value

Rigaku ED-XRF (with Helium if required) for elemental analysis of metals and halogens

Closed cup seta flash for flash point testing to determine flammability

Hach Lange spectrophotometer (metals and ions in aqueous solution, Ammonia, Cu, Ni, Zn, Pb, Cr, Chlorides, COD, Sulphates, Sulphides, Cyanides)

Oxidising test strips (starch-Iodide)

Wet chemistry titration techniques – Strengths of acids / bases etc

pH probes



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Test strips

Extracted Fume hood for safe handling and testing of materials

All the Site Chemists are trained in use of the onsite laboratory and there is a robust waste acceptance and sampling procedure for wastes received at the site.

Wastes such as oily rags, metallic powders or other streams identified at the point of pre-acceptance to require additional temperature checks will be checked with thermal imaging camera upon receipt. These streams will then undergo additional monitoring whilst onsite as they have been identified as higher risk. Any checks will be recorded on the chemist acceptance sheets for these materials.

Rags and absorbent storage are covered by dedicated thermal imaging cameras with monitoring in the lower yard (Bay D9).

3.2.3 Waste storage times, stock management and rotation

The waste will be received, processed and removed from the site typically within two weeks or until sufficient material is received to make viable loads to send to end treatment where the waste is not treated onsite. The maximum duration of waste being stored on site will be 6 months, however it is thought highly unlikely that waste will be stored on site for more than 3 months. Wastes for treatment in the lower yard are typically treated the same day or within a couple of days of acceptance onto site. This may be due to campaign work and the most efficient utilisation of the infrastructure. Combustible wastes will be stored within their designated bays, as shown in **EMP011-BKP-FPP-V08-01 -Lower Yard Layout** and **EMP011-BKP-FPP-V08 -01 -Upper Yard** and **Annex 2 - FPP-V8 - STOCKPILE LOCATION TABLE-V1** gives quantities of materials stored. Contaminated wipes and absorbents are repacked for onward shipment immediately prior to dispatch such as rags or absorbents for export if not being stored in ventilated metal shipping containers.

Hazardous packaged wastes stored onsite in the transfer station (upper yard) will be stored in segregated concrete bays with self-contained drainage in metal clad open buildings. The walls of the bays will be built from precast concrete and constructed to the BS8110 Pt2 'Structural use of concrete Part 2 Code of practice for special circumstances' and BSEN1992-1-2 'Design of concrete structures. General rules - Structural fire design'.

In accordance with BSEN1992, the fire resistance of concrete structures over 120mm will have a fire resistance of 1200°C for 2 hours.

The bay walls are 120mm thick concrete and offer a fire resistance period of at least 120 minutes to allow waste to be isolated to stop fire spreading and minimise radiant heat for bays where combustible material is stored. The steel work is intumescent painted to give the



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required fire resistance for any bay storing combustible materials. Any gaps above the concrete bay walls is filled with 2-hour fire rated fire curtains to the void of the roof to ensure any fire cannot spread between adjacent bays.

All waste received onsite is logged onto an electronic stock control system. Waste is only stored for 2 weeks typically unless there is insufficient material to build a viable load. The higher volume streams such as garage wastes (rags/filters/oil) and paint / resin related wastes are typically moved promptly. Incineration wastes may move more slowly due to capacity constraints at end treatment or shutdown periods.

Stock at 3 months will be moved onward to third party disposal to ensure permit compliance and allowance for transport and booking slots at third party treatment to become available.

At the point of pre-acceptance any materials likely to self-heat are identified on the chemist technical sheets which they use to assess loads.

The capacity and storage locations of different materials is located on the site plans, shown in Figures 3.1 and 3.2 , Annex 2 and stock control sheets. The chemists will inventory material onsite each day to ensure the stock lists are accurate and bays are within capacity (as well as stock within date). This will be checked by the General Manager and Transfer Station Manager to ensure compliance.

All waste is segregated and stored in accordance with HSG51, HSG71, Chemical waste: appropriate measures for permitted facilities guidance and Guidance for the storage and treatment of aerosol canisters and similar packaged wastes.

BKP aim to work on a basis of minimal stock levels onsite. Material is typically sent to other sites within the GRG Waste UK Group (Chloros, Greenway) promptly from receipt where the material is exported or processed. Where there are insufficient materials to compile a full artic load BKP use their own fleet of vehicles to complete multi-drop deliveries into suitable treatment facilities in the midlands/north of England to keep stock levels to a minimum.

Daily checks are completed on all material in storage to monitor for elevated temperatures as part of site daily compliance checks completed by the site manager (or senior site chemist their absence). This includes non-hazardous combustible materials that have been transferred to skips onsite. Materials are wherever possible stored under cover and out of direct sunlight so reduce the risk of self-heating. Should any hot spots be discovered the material will be moved to quarantine area and fire-fighting measures / emergency plan followed.

Site Chemists complete daily stock checks to check age of material and prioritise moving older stock items. The Transfer Station Manager will oversee the stock control for the site and the general manager will be responsible for ensuring stock is moved promptly.

Non-Hazardous combustible materials are typically onsite for less than a week as these materials can be moved readily into local EFW or landfill. Non-hazardous sludges are generally non-combustible but are also frequently moved into non-hazardous consolidation outlets.

3.2.4 Waste and product storage stacks



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The following storage limits will apply are included in the document – *Annex 2 – FPP – Stockpile Table* detailing the types of waste and storage locations. The locations of all storage are included in. Each individual area and fire water containment area is identified by site for later consideration in fire water retainment calculations.

The site does not store baled wastes.

3.2.5 Overheating of stored wastes

Wastes will be kept out of direct sunlight and stored in covered buildings where possible. All wastes will be isolated from sources of ignition and heat and flammable materials. Wastes likely to overheat are stored within metallic containers out of direct sunlight in accordance with environment agency guidance. Additional monitoring is completed on these wastes., with daily thermal imaging checks with a handheld thermal imaging camera carried out as part of the daily compliance checks. These checks are carried out by either the site manager or senior site chemist. All the storage bays in the transfer station are covered by thermal imaging cameras as well as offload area.

3.3 Storage Bays/Separation Distances

Transfer station area (Figure 3.1)

The site has been designed to maximise the separation distances between combustible wastes. Flammable Liquids are segregated as far as possible within the footprint of the transfer station from other combustible materials. The flammable liquid storage location is designed to eliminate the risk of running fires from the self-bunded bay being breached. Fire water overflow from this bay will flow into the tertiary containment and occupy the area surrounding the offload pad and the area in-front of the bay. Each bay has a roller-bund to prevent ingress of water into a storage bay and subsequent spread of a running pool fire. The area outside of the bays excluding the storage bays highlighted in yellow below occupies 905m². Each segregated bay is sloped backwards and has its own containment >110% of the volume of liquid of the largest container stored within it. All bays are cast-insitu concrete and all joints are resin sealed with a chemical resistant epoxy resin.

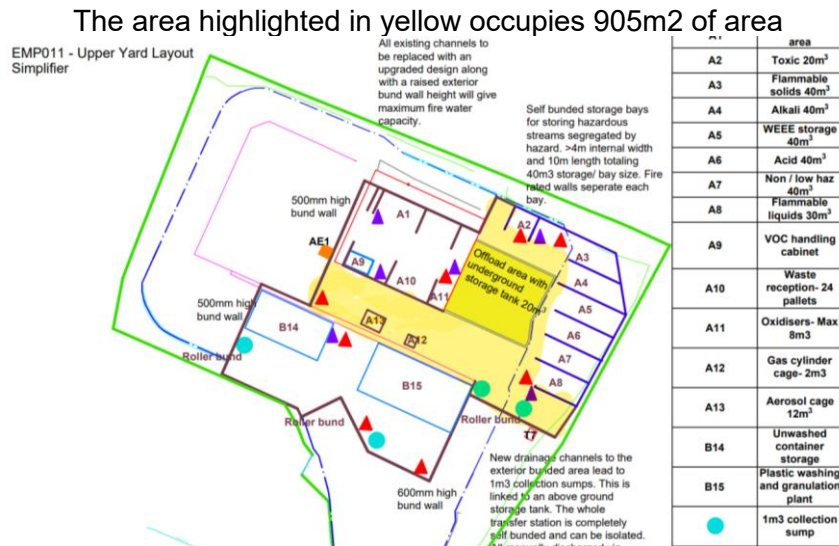


Figure 3.1 – Transfer Station Area – Tertiary Containment

Bays are segregated by maximum separation distances and there is >6m separation distances between combustible and non-combustible materials. All flammable materials are enclosed within full height fire walled bays built to the appropriate British standard BS:EN1992 fire ratings.

Bay A3, A5 and A8 have full height fire walls to ensure no spread of fire between the bays. The other bays are constructed of pre-cast concrete panels that are sealed on top of a poured in-situ plinth (500mm) with necessary chemical resistant sealants to prevent egress between bays.

The bays have 1m pre-cast fire rated concrete panels to internal height 1.2m above the maximum height of the waste stored within them for the bays that are not fully enclosed (3.6m height from ground level to top of fire rated panels)

Figure 3.1 – Fire Water containment - Tertiary

The bays design is such that when any segregated bay containment is breached fire water will flow into the main open area of the site and the off-loading area which is itself bunded and has an underground storage tank for containment of 25m³. The location of the flammable liquid bay is to address pool fires which may spread. In this location there is minimal impact initially when the bay overflows as the area surrounding it is well clear from any combustible materials and can be accessed through the metal palisade fence that runs around the edge of the perimeter of the site.



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At a height of 300mm (height of the bund without allowance for foaming agents etc) including the underground storage tank but excluding the existing transfer station this occupies a total capacity of 296.5m³ in the yellow area pictured.

Fire Water can be easily removed from the sump in-front of the flammable liquid bay A adjacent to the roller bund where the site is accessed and the levels of the site are such that water from all of the transfer station will flow towards this as the lowest point. This can be accessed without entering the site to remove water if required in the event of a fire or unstable structures after a fire event.

There 500mm high bund wall along this wall as cast in-situ concrete in accordance with CIRIA 736 to contain all fire water and surface water run-off in the event of a fire and exceeds all EA fire prevention plan guidance for containment to allow for future proofing and climate change rainfall events.

The layout of the storage bays segregates combustible materials from combustible materials with a distance of >6m. All materials in the storage bays denoted are included in **Annex 2 - FPP Stockpile Location** sheet. The bays are segregated by fire walls in addition to these separation distances. Any bays with combustible materials have full height fire walls, intumescent painted steels and fire curtains to the top of the height of each bay.

All fire walls conform to with BS EN1992.

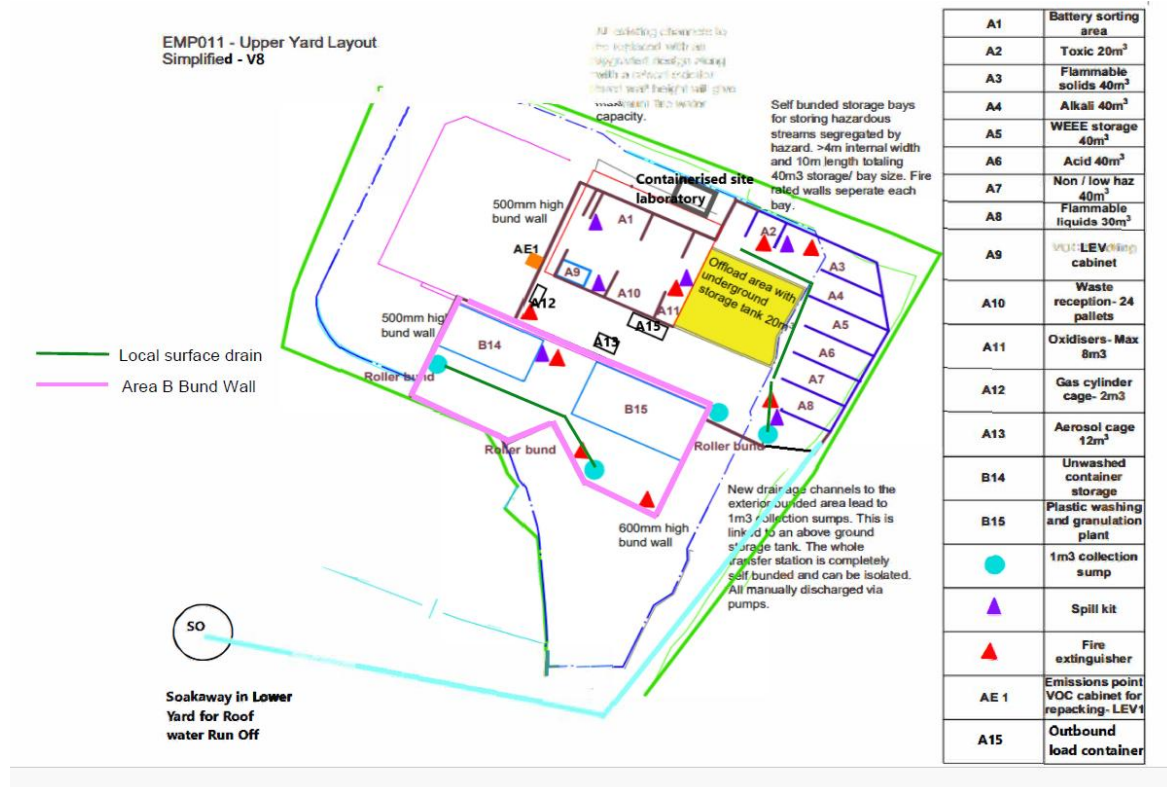
Aerosols are stored in a ventilated 20ft metal shipping container. This is not in contact with direct sunlight. The aerosols within them are stored in suitable ventilated containers that meet the Guidance for the storage and treatment of aerosol canisters and similar packaged wastes in cages. They are stored >6m from other combustible wastes. The area in which they are stored is monitored with handheld VOC monitors if required onsite and as a precautionary measure zoned and clearly labelled.

At a height of 300mm (height of the bund without allowance for foaming agents etc) including the underground storage tank but excluding the existing transfer station this occupies a total capacity of 296.5m³ in the yellow area pictured. There is an additional 200mm of capacity above this if required for foaming agents and any significant rainfall events.

Plastics Recycling area Containment - Figure 3.2

The plastics recycling and storage area is within it's own dedicated bunded area. This was constructed in 2023 and is designed in accordance with CIRIA 736 and has it's own sealed drainage system and cast-insitu impermeable concrete floors and bund walls. **BKP-SO-Appendix 1 - Hazardous Waste Secondary Containment by Site Area for Waste Storage** gives images showing the containment and bunding in this area.

Figure 3.2 – Plastic Plant Bunding Layout



The footprint of the plastics plant bund is 818.12m² in area – shown in pink outline in Figure 3.2. There is a 600mm high bund wall around the area for containment and both roller bunds allow access for vehicles in and out of this area.

With the fall present within the bay is 200mm from the highest to the lowest point which is on the entrance to a local collection sump that is 2m³ in volume. There is another collection sump for surface water at the other end of the drainage channel of 2m³ in volume. All drains are designed in accordance with CIRIA 736 and are resin sealed so the whole area within pink is bunded and impermeable.

Conservatively depending on volume of material stored within the bay and the footprint and displacement that this provides there is 245.4m³ of containment within this area before the lower 600mm bund wall was breached excluding any foaming agents used to suppress a fire. This is allowing for all the storage area in B14 to be at capacity with material.

Allowing for foaming agents of 100mm this allows 204.5m³ of containment for fire water prior to this bund being breached, assuming no surface water within the bund and the 2 x 2m³ sumps are full at time of fire.

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Empty containers to be processed are stored in area B14 with 10m segregation from the building for insurance purposes. The pile sizes stored are included in **Annex 2 – FPP-V8-Stockpile Table** but containment even using conservative estimates far exceeds the fire prevention plan guidance.

The drainage is again designed such that the lowest point would be accessible without entering the area to remove fire water if required. I.e. Immediately adjacent to the gate where no waste is stored.

Lower yard containment (Figure 3.3)

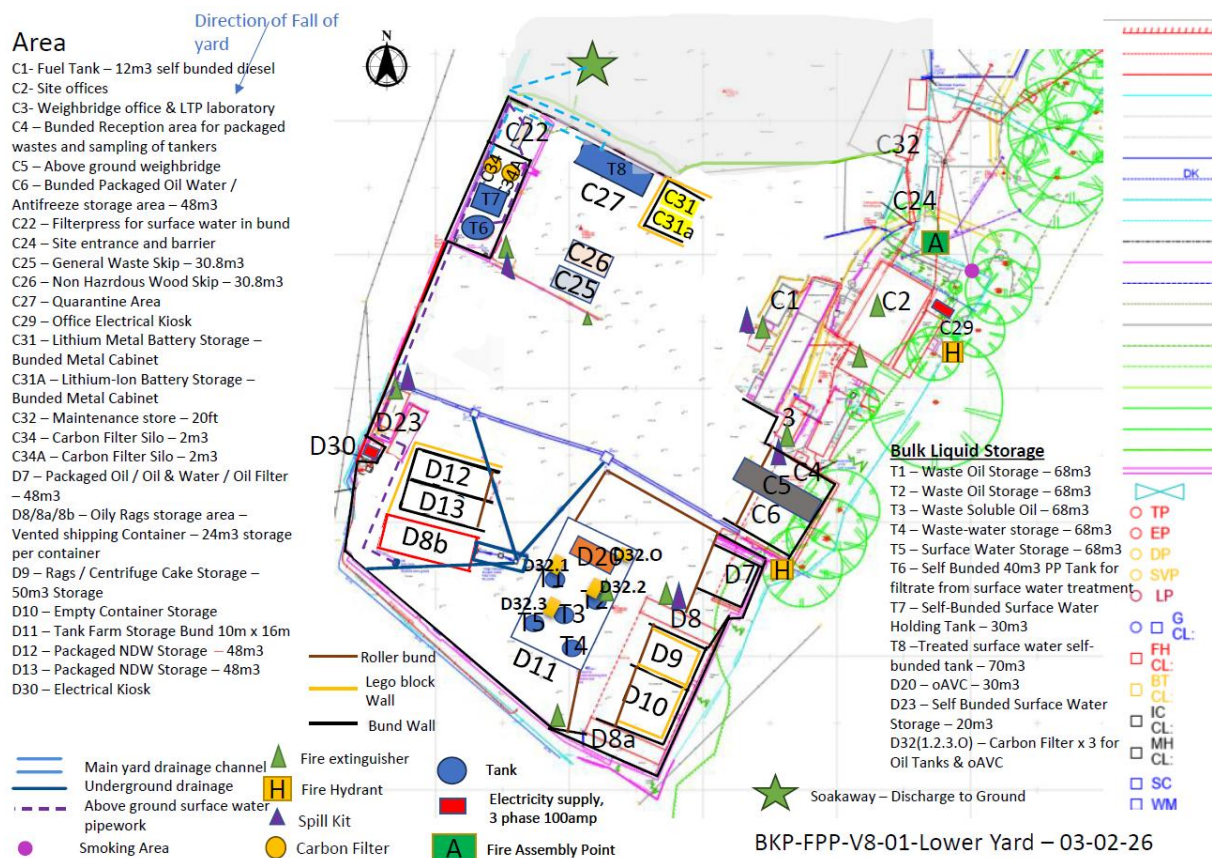


Figure 3.3 – Lower yard layout – N.b. 2 x Fire Hydrants shown on right hand side of site

The lower yard area has undergone changes with additional bunding and containment added to allow non-process and non-storage areas to be better segregated to allow discharge of uncontaminated rainwater via soakaway after filtration and polishing and compliance testing.



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The whole of the lower yard is impermeable concrete excluding the grey area in the drawing which is unmade compacted aggregate. No waste operations take place in this area other than a soakaway that currently receives roof water from the new transfer station buildings. All waste storage areas have their own individual impermeable bunding and local sealed collection sumps for containment.

Details on all bunding and infrastructure is included within **BKP-SO-Appendix 1 - Hazardous Waste Secondary Containment by Site Area for Waste Storage**. This shows the segregation between waste storage and processing areas and non-processing areas.

The lower yard has a 750mm high bund wall running along the edge as indicated on the site plan. The site is 45m wide at it's narrowest point but because of the falls it reduces the effective capacity of tertiary containment to this area of the site to circa 450,000 L capacity containment allowing 100mm freeboard above ground for foaming agents. There is a 70,000L interceptor onsite and routinely when soakaway discharge is instated.

Maximum rainfall calculated as 4,900m² for lower yard catchment area and 24-hour rainfall is max 40mm (Storm Bert, Met office data for Romsey). This means 196,000L could fall within the lower yard (Areas C and D) in a 24-hour period.

Allowing for this event assuming no water is removed from site or processed within a 24-hour period then there would still be in excess of 250,000L available capacity for fire water.

In the event of storm events the site manager will instruct staff or themselves to ensure surface water is pumped to above ground storage tanks and prior to any storm events that all available capacity in above ground storage vessels for surface water will be retained.

The bund wall was installed in 2023 to ensure maximum containment and future proof the site against climate change events and periods of heavy rainfall due to the large area of impermeable surface in the lower yard.

If required mobile tanks (2 x 30m³ AVC units) are available that are currently not in use but owned by BKP can be deployed in the lower yard to provide additional capacity if required.

Area C

The onsite Diesel tank (C1) is >6m from any other combustible material in a self-bunded tank on an impermeable surface in the bunded area.



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The General Waste skip (C26) is stored within the main impermeable bunded area, as is a skip for uncontaminated wooden pallets (C25) that are produced by the site when waste is received and repalletized or empty containers are processed from the pallets they are received on.

Waste Lithium Ion and Lithium Metal batteries are stored in 2 dedicated ventilated bunded 20ft metal containers. Details on sorting and checks prior to storage is included in section 1.6 of this document and associated SOPs **TS-ABTO-05 - Lithium Battery Safety & Management**, **TS-ABTO-02-Packing Lithium Ion Batteries for End Recycler**, **TS-ABTO-10-Packing Lithium Metal Batteries for End Recycler**.

Because of the falls within the main area of the yard all effluent flows down towards the main surface water drain that bisects areas C and D. This drain flows into the main sealed site interceptor where water is pumped to above ground tanks manually prior to further polishing and discharge.

Area D

The packaged Oily rags / absorbents (8/8a/8b) are stored in vented metal containers. They are within the main impermeable bunded area. They are stored in metal containers. Packaged absorbents may also be stored in bays D12 & D13. These bays are fully bunded with >20m³ liquid capacity (they were previously used for washing out solids from tankers). Details on infrastructure is included within **BKP-SO-Appendix 1 - Hazardous Waste Secondary Containment by Site Area for Waste Storage**. Absorbents may be repacked into bay D9 24 hours prior to dispatch offsite. This area is monitored by thermal imaging and CCTV with remote monitoring. Material is checked by hand-held thermal imaging cameras prior to processing and once repacked as well as when material is loaded.

Bay D9 is built with 4 high 600mm x 600mm x 1200mm interlocked fire rated concrete blocks. These are >1m above the height of any waste stored within the bay.

The Waste Oil stored in Tanks (T1/T2) is in mild steel tanks. These are within a tank farm bunded area with 176,000L capacity of impermeable surface. Soluble Oil is stored in tank T3 which is 90+% water and non-combustible material. This tank farm bund is built onto the existing impermeable surface with piling below which is sealed around the pile caps. This is then a bunded area within the larger lower yard bunded area. They are >6m from any other combustible material.

The packaged oil filters / oily sludges (D17) are stored in containers within the bunded area. They are >6m from other combustible wastes and all packaged waste is stored with it's own separate bunding by storage area with self-contained drainage.



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3.3.1 Stock Rotation

Waste will be initially taken into the reception area, where it will be checked by a degree level Chemist within 24 hours of receipt before being transferred to the relevant storage location.

Combustible wastes are not stored in loose form except any absorbents prior to loading, and there are no external storage stockpiles. All non-hazardous combustible waste is transferred to a skip, which are transferred off site when full to local Material Recycling Facility. These are removed from site on a monthly basis, on average and will not be stored on site for more than 3 months. Combustible packaged wastes are stored in containers in dedicated bays prior to transfer offsite or treatment. The waste is not stored for periods exceeding 3 months.

Sometimes due to issues with Incineration capacity some incineration waste streams are stored for over 3 months. After 3 months the site manager will ensure these are routed to alternative outlets when the stock is becoming aged if slots are still unavailable or cancelled due to shutdown periods.

Typically waste is not stored on the site for more than 1 month, before being transferred to a third party licenced facility. Wastes suitable for treatment are typically processed within 1 week of receipt.

Stock rotation will form part of the Daily Site Checks and age of waste recorded from daily stock checks.

All management and chemists will be trained in this procedure and aware of stock rotation.

3.4 Fire Quarantine Area

The Fire Quarantine Area is a dedicated area with a clear area of at least 6m around the perimeter which will be available at all times (C27) on site plan. This area will be used to place any waste that is smouldering or alight until the risk to receptors has subsided and the waste is safe to remove from site. The quarantine area has been sized based on storing a full container or the maximum pile size in line with the FPP Guidance of 10m x 7m. The area is marked on one side with fire rated concrete 1200mm x 600mm x 600mm lego block walls, 3 blocks high to prevent radiant heat towards the unmade ground level. If safe to do so, the container can be moved to the quarantine areas.

For other waste, if safe to do so, it will be moved to the Fire Quarantine Area using mobile plant and machinery – Telehandler, FLT, Excavator.

The Fire Quarantine Areas will be marked on the ground. This area is concreted and is located within the sealed impermeable tertiary bunded area.

3.5 Signage

Signage will be positioned throughout the facility showing Fire Exits and the position of extinguishers and other relevant firefighting equipment as detailed in section 4.1 and shown on site plans in figures 3.1 and 3.2 denoted by a red triangle.

All waste storage areas will be clearly marked to ensure the correct waste types are stored in their storage locations with their bay numbers and this will correspond to the site plan.

The company will reinforce fire prevention messages using signs with key messages for staff.

3.6 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, BKP will ensure that all relevant staff and contractors will:

- Understand what they must do during a fire.
- Know where the fire prevention plan is kept.
- Participate in regular exercises, including toolbox talks, E-learning, practical demonstrations and quizzes to test how well this FPP plan works and to confirm all operators, supervisors, chemists and drivers understand what to do.
- Separate 3rd party fire extinguisher and fire training has been completed for a number of operational staff including supervisors, managers and chemists.

In addition:

- Fire alarms will be tested weekly
- A Fire Drill will be carried every 6 months to test the effectiveness of the evacuation plan
- A nominated member of staff will be trained to satisfy the function of a Fire Marshall.

For visitors to the site:



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- They will be escorted at all times following signing in, unless they have been inducted (including what actions to take in event of a fire)
- They will understand the no smoking policy for the site.
- When signing in, information on the fire exits and muster point will be provided

In accordance with the Environmental Management System (EMS) all training and awareness raising will be recorded on the company health and safety and training system. All training is recorded via this method and online learning is completed for most training.

Contractors will complete permits to work, these are recorded electronically and stored on the company E drive. Only authorised personnel onsite are able to sign off permits to work or escort visitors around site. The authorised personnel are displayed on the permit to work board in the main office. This is overseen by the Site Manager who is responsible for all staff and contractors onsite.

Any work completed onsite must be associated with designated RAMS for this task. These will be signed off and agreed by the HSEQ Manager, the Site Manager or in their absence the Group Operations Manager or relevant Director are able to sign off these. Only signed off RAMS will allow work to commence and permits will be issued and displayed by contractors whilst onsite. Copies of permits are stored electronically on the company health and safety reporting system.

Only work that has been properly assessed for safety and fire implications may be completed onsite and permits must be displayed at all times.

All operational staff are responsible for ensuring this is followed and this routinely retrained via the toolbox talk system.

BKP will ensure staff and contractors follow safe working practices when undertaking all activities which pose a fire, health and safety and environmental risks, such as those set out in this Fire Prevention Plan.

3.7 Security

The following security features will reduce fire risks, particularly from vandalism and operational risks:

- The original Hazardous Waste Transfer Station building and ancillary buildings will be secured by lockable doors when not in use
- The Transfer Station has a separate gated entrance. The doors are only opened when receiving a vehicle to unload/load. The 2.4m palisade fencing will be closed and locked when site is unoccupied or is it not in use.

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- This gate will be locked when the site is not operational to the transfer station as well as the gate that leads in to the yard next to the transfer station..
- There is separate main gate to the whole site, which is locked at the end of each working day.
- There are vehicle barriers at the entrance to the main yard which can only be opened remotely by BKP staff preventing unauthorised access (e.g. from people trying to get in thinking the site is the HWRC next door) as well as gates.
- CCTV is installed to cover the entire site with remote monitoring
- The CCTV is linked to mobile phones to allow remote access to the management team. In the event of a member of the management team being contacted by the CCTV/Alarming company out of hours they can access the cameras remotely to check if there is an incident or a false alarm.
- All functions of security will be checked on a daily basis and information recorded on the daily inspection form *DCL-01a*.

3.8 Planned Preventative Maintenance

A programme of routine planned maintenance is provided for each item of plant and machinery, in order to prevent breakdown and faults which may pose a fire risk.

The Planned Preventative Maintenance Programme includes:

- Items of plant and equipment to be maintained
- Frequency of maintenance (dependent on manufacturer's instructions)
- Person responsible for maintenance or arranging maintenance
- Actions to be taken in the discovery of a problem. This will include:

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

The Managers will document the problem, and record the actions needed, person allocated and deadline for completion. This will be recorded as part of the documented Planned Preventative Maintenance Programme.

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.

All plant and machinery is subject to daily checks prior to use by trained staff.

There is a workshop on site and maintenance staff available during the operational hours.



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3.9 Contingency

In order to ensure all permitted waste quantities are adhered to and no amenity issues or increased fire risks are caused, BKP has

- A list of plant hire companies to source alternative equipment if required.
- A list of primary sites that will take the waste.
- A list of alternative facilities to take the waste.

With regards to the Hazardous Waste Transfer Station, waste is only received if there is an approved outlet and the necessary pre-acceptance checks have been completed in line with appropriate measures guidance.

The wastes managed by BKP are not subject to seasonality.

In the event of a fire at the site, the Site Manager will notify the Transport Manager and customer care and sales team who will:

Notify all drivers to divert to another waste facility immediately via radio/mobile phone if they have already collected material.

Notify drivers not to collect any material intended for the site

The Site Manager will be responsible for notifying the Site Chemist and Technical teams to seek alternative routes for any streams currently in transit if they cannot be received at the facility.

3.10 Ignition Sources

3.10.1 Hot Exhausts

During operations, site operatives will be vigilant for signs of ignition from operational hot exhausts such as those on vehicles used for transport and waste movement.

When vehicles are not being used, they will be switched off and parked in adjoining land which is away from the combustible materials. When vehicles are switched off, they will be inspected by the operator to make sure that they are parked in the correct area and not likely to be affected by dust settling on the exhaust. At the end of the working day, the Transport Manager will carry out a final check to make sure vehicles are parked in the correct place as part of the end of day fire watch. All the vehicles have dedicated parking bays well segregated from one another in the area marked on the plan as vehicle parking.



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A forklift is used in the Top Yard and lower yard. A telehandler and excavator are used in the lower yard. These are subject to daily checks and servicing and maintenance on a schedule by specialist contractors.

3.10.2 Hot Works

As part of waste operations, hot works will not be needed. However, if hot works such as welding is 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. We check sub-contractors qualifications prior to allowing them to start work, and keep records of their qualifications on file. We also ensure the sub-contractors have the necessary insurance in place, have a health & safety policy and have completed a risk assessment which has been reviewed and approved. 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. The area in which the works was completed can then be reinstated once this has been done and permits signed off and filed electronically.

Hot works will only be completed in an area deemed safe by risk assessment and completed hot works permit to work signed off by authorised member of management team and displayed in the main office. This will only be approved >10m from combustible or flammable materials. If work is needed to be completed within 10m of flammable or combustible materials this must be individually risk assessed and only hot works completed if there is no suitable alternative measure (i.e. can the combustible materials be moved, can this be completed by alternative techniques with no hot works etc)

3.10.3 Electrics

All site electrics will be certified by an electrical contractor and maintained in accordance with the manufacturers' recommendations. This will be subject to fixed wiring inspections.

Only approved electricians can complete any electrical works.

Staff are trained to safely isolate electrical equipment prior to qualified electricians completing works.

No non-PAT tested appliances can be used, including any portable heaters in offices. No charging of personal devices at work using non-tested chargers.

3.10.4 Hot Loads

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

- All drivers will be required to stop at the weighbridge when entering the site.
- The waste will be inspected on arrival. This includes checking that the waste and the paperwork, is compliant with the permit and is not hot.
- Materials identified at pre-acceptance that may be liable to self-heating are checked using a thermal imaging camera that is available onsite. The camera is stored in the site managers office and is serviced and maintained annually by manufacturer.
- If the load is observed to be smouldering, the vehicle will not be allowed to deposit its load. The vehicle will be moved to the QA in the main yard.
- The fire extinguishers, as detailed in Section 4.1 or water (depending on the contents) will be used
- If necessary, the fire service will be contacted.
- If loads are received in the waste transfer station and are detected as hot from thermal imaging cameras covering offloading areas the pallets will be moved if safe to do so to the quarantine area.

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

3.10.5 Leaks and Spillages

Fuel storage will be in accordance with Oil Storage Regulations. Vehicle re-fuelling will be undertaken by fully trained staff.

Spillage procedure, TS OP 014 Spillage will be implemented in the event of a leak or spillage from site vehicles or waste delivery/collection vehicles. A spill kit will be kept in the site office. All staff will be trained in the use of the spill kit. Spill kits are located around the site as marked on the site plans.

The Hazardous Waste Transfer Station is a fully enclosed impermeable bunded area and all spillages will be captured within this area and suitable cleaned following the spillage procedure and the resultant materials safely disposed of, off site. All effluent from this area is treated as contaminated and sent to third party licenced treatment facility.

3.10.6 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. A DSEAR assessment has been carried out by a competent authority

and this confirms that due to minimal amounts of dust on site, an explosive atmosphere due to dust will not occur,

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 following specific inspections will be carried out:

- Daily - The Managers/Supervisors will carry out an inspection of all work and storage areas to ensure safe storage, access and egress. Particular attention will be required to identify any potential fire hazards when opening the site in the morning and prior to securing the site at the end of day. Any cleaning requirements will be implemented.
- Daily – Safe storage of flammable materials. Gas bottles are to be stored within the designated secure cage and stock levels of flammable liquids and solids are checked as part of this. Capacity of all capacity of all waste stored onsite is checked.
- Weekly – Portable fire-fighting equipment should be visually inspected and replaced as required. Full site cleaning undertaken.

3.10.7 Other Materials

Gas cylinders will be kept in a cage, outside in line with the Guidance for the storage and treatment of aerosol canisters and similar packaged wastes. A maximum of 15 of gas cylinders will be kept onsite at any given time and this is not core business for BKP. Where possible cylinders will be collected by approved specialist third parties for example Synergy and/or cylindercare.

3.10.8 Lithium Batteries

Lithium batteries are stored in accordance with packing instructions by lithium metal ABTO-10-Packing Lithium Metal Batteries for End Recycler, or Lithium Ion or ABTO-02-Packing Portable Lithium-Ion Batteries for End Recycler. They are stored in dedicated banded metal containers within drums with inert packing material. The storage containers are surrounded by fire rated concrete lego blocks (excluding the access point to the containers). There is segregation from all other combustible wastes and vehicles/site buildings in excess of 20m.

3.10.9 Fire Breaks

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Fire break distances are shown on scaled site plan. The surface areas and storage dimensions are shown in the *Annex 2 -FPP-Stockpile Table*. All pile sizes, heights widths volumes lengths are in accordance HSG51, HSG71 or the EA's FPP guidance.

For packaged wastes that are on fire additional fire breaks surrounding would be created if safe to do and under the guidance of emergency services by moving materials in adjacent storage areas.

3.11 Additional Actions

Further actions to mitigate fire risk on site include:

- The access route into the waste site will always be kept clear and will therefore provide access for emergency vehicles.
- Site walkovers taken each day will identify any accumulations of combustible litter or material which may pose a risk in the areas used by vehicles.
- Operational vehicles and the fork-lift truck will be fitted with fire extinguishers.
- Sources of ignition including non-energy efficient (heat emitting) light bulbs, lit cigarettes (except in the designated smoking area), naked flames and storage heaters will not be allowed on site.
- At the end of each operational shift, an authorised Manager will conduct a site walk over to check all equipment is off and parked away from combustible materials.
- There is a separate smoking area for staff. This is located in the site Car Park, remote from all waste storage areas and buildings.



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4 Fire Detection and Management

4.1 Detecting and Suppressing Fires & response procedure

All staff are trained to be vigilant in terms of fire detection if a fire is detected they should notify the TCM, General Manager or Site Chemist to raise the alarm. The fire response procedure should then be followed.

There are fire detectors fitted in storage bays within the transfer station building and plastics recycling building and all areas are covered by CCTV. Thermal imaging cameras cover the storage bays within the new transfer station and lower yard areas for storing oil contaminated absorbents if repacked.

If the fire occurs out of hours, the Transport Manager, Site Manager, Managing Director and Group Operations Manager shall be informed via the CCTV / Alarm monitoring company via mobile phone. The available personnel (the site manager lives in Romsey, less than 3 miles from the site) shall make their way to site and assist the Fire Brigade.

Each staff member will undergo training from the Site Manager/TCM/HSEQ on the fire response procedure. This will be recorded on the companies health and safety reporting system and refresher training will be completed annually or if any changes are made to the FPP.

Ongoing Toolbox talks will be completed periodically to remind staff of the FPP.

A full simulation of the use of this procedure will be completed once every 6 months to ensure all staff are aware and competent in its use.

If a fire is detected onsite the response is below;

Fire Response Procedure		
Action		Responsible Person
1.	Raise the alarm (if not already done by another member of staff)	Chemist/Manager/TCM
2.	Initiate evacuation of all visitors and start evacuation of all staff and role call pending assessment of the fire with relevant staff	Site Manager / HSEQ Manager
3.	Small scale fire – Cordon off the area and direct employees to a safe area. Move container to the Fire Quarantine Area. Attempt to control the fire using the appropriate equipment kept on site. If fire	Site Manager / HSEQ Manager / Group



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	can be controlled skip to point 5. If it becomes clear that the fire cannot be dealt with safely and effectively by site personnel, evacuate the site and contact the Fire Brigade on 999; or Large scale fire – Do not attempt to control the fire. Evacuate all personnel from the site and contact the Fire Brigade on 999.	Operations Manager / Director
4.	Notify BKP Directors if they have not been already notified. Notify neighbours. Notify GRG Waste UK Board	Site Manager
5.	Ensure access routes are clear for fire brigade. Where possible and safe to do so move combustible material away from fire to create additional fire breaks	Site Management
6.	Engage with fire brigade upon their arrival and direct to fire and nature of material and site. Supply them with FPP	Site Manager / Group Operations Manager / Director
7.	Ensure FPP is followed and no fire water is released to the environment	Site Manager / Technical Director
8..	Follow instructions from fire brigade	All staff
9.	Notify the Environment Agency	Site Manager / Group Operations Manager
10.	Maintain control measures until fire is extinguished	Site Manager / All Site Staff
11.	Begin clean up operation after fire brigade have instructed it is safe to return to the site and site is handed back to operator	Site Manager / Group Operations Manager
12.	Samples of fire water sent as urgent to third parties or sample loads arranged. N.B. Nature of materials in fire will need to be identified to confirm if POPs are present and waste declaration completed I.e. WEEE Bay	Technical Director / Site Manager / Laboratory Chemists

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13. Record the fire using the Incident Record Sheet and site diary

Site Manager

Table 4.1 – Fire Response Procedure

All staff are trained in these procedures. All staff will be trained by the Site Manager / HSEQ Manager in this procedure. Within 6 months the training will be recorded on the safetycloud system.

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

Fire extinguishers will be provided strategic points within the buildings. These are indicated on the site plan. Specific guidance and training for lithium metal battery fires and safety is covered in a separate document. The site will be inspected daily by the general manager and transfer station manager and daily walk-round checks completed.

These checks include monitoring for hot spots and self-heating material with thermal imaging cameras *OP11-DCL-02-Temperature Checks*

Around site as denoted by the site plans there are fire extinguishers. They can be one of the following.

The top and bottom yard locations have:

- 6L Foam Fire Extinguisher
- 6L Water Extinguisher
- 6L Powder Extinguisher
- CO2 Extinguisher

There are safety instructions provided showing the use of each extinguisher;

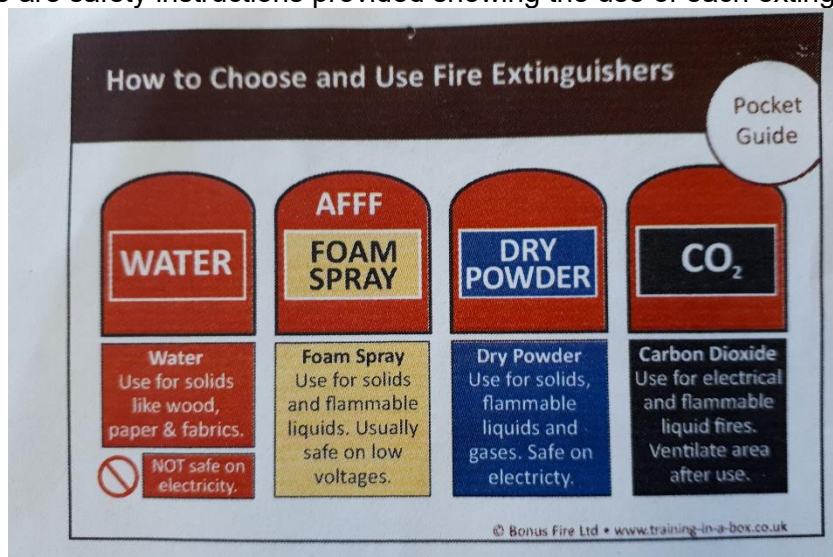


Figure 4.1 – Fire extinguisher use

For waste wood, plastic, metal and the WEEE stored outside in containers (TVs, Fridges, Small Domestic Appliances), the foam extinguishers will be used.

Flammable Liquids and solids should have foam extinguishers used in the event of a fire. Adjacent to the flammable bays are foam extinguishers.

For batteries within the battery container type D extinguishers should be used if there is a fire. If it is unclear which chemistry of lithium is on fire then a powder extinguisher should be used. Water should not be used on lithium metal battery fires unless there is sufficient water to completely quench the fire.

General battery fires caused by trailing leads or short circuit should be combatted if safe to do so with dry powder and sand. If the material can be covered with sand it will prevent onward spread of fire and the heat should dissipate over time.

There are no sources of ignition or electrical power within the battery storage containers or Oxidising storage area. Within both flammable solid and liquid storage areas ATEX lights are installed as a precautionary measure but the area is not zoned under DSEAR assessment.

Additional resources / Infrastructure to enable fire fighting

4.2 Water Supplies

Water supplies will be from the following sources, please see section 4.4.2 for the worst-case fire scenarios

There are 2 x Fire hydrant onsite easily accessed in the lower yard and one is within 100m of the site access. One is accessible from inside the site and the other is outside the offices on bunny lane. This hydrant can supply 52L/water/min, which is lower than the normal pressure of a hydrant due to the remote location of the site. This was calculated based on an 8-hour average reading during peak usage. The volumes expected during a fire event would likely exceed this.

There are a number of tanks holding clean surface water prior to discharge to soakaway or rain-water prior or post filtration that can be used in the event of a fire. All tanks have 3" BSP/Bauer fittings attached and adaptors are available onsite for any loading configuration. Water can be pumped from these tanks using Air diaphragm pumps if no vacuum tanker is available at a rate of 227l/min from these tanks (1+1/2 EODP are used on the surface water treatment plant) and available for this use.

In the event of dry weather the final treated surface water tank T8 will not be discharged to soakaway until there is sufficient rainfall volume to replace it and tank T6 cannot be polished through carbon until tank T8 is empty so this can be left full.



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T8 – 70,000L – Clean Surface Water from lower yard prior to discharge to soakaway meeting BAT-AELs limits which is suitable for fire fighting – 1st Option

T7 – Untreated surface water holding tank holding 30m³ of capacity – 3rd Option – last resort if no other water supplies available as will contain some suspended solids

T6 – Filtered surface water prior to GAC polish – 40m³ – 2nd option if required

The site has 6 vacuum tankers that can load 25,000L in volume in approximately 25minutes if required. This will then take approximately 25 minutes to discharge. The vacuum tankers are available and serviced as part of PPM and ADR stipulations. There is always a clean barrel available onsite as only 4 artic units currently in use routinely.

Worst case scenario water available;

70,000L from Tank T8

40,000L from Tank T6

9,360L available from hydrant based on worst case pressure

Based on a 3 hour average there is 119,360L minimum available for fire fighting in addition to any water the fire brigade would supply upon arrival.

4.3 Fire Response Procedure

4.3.1 Out of Hours

The fire response procedure will then be implemented. The Fire alarm system and CCTV cameras are monitored off-site by Moore Security. Senior Site Staff have access to the CCTV camera footage via a mobile phone app. They provide 24-hour active monitoring of the cameras and fire alarm system. In the event of a fire they would call the Site Manager, Managing Director, Group Operations Manager or Transport Manager should they have any indication of a fire or compromise of the sites security. Based on CCTV footage and area of fire actions will be taken to direct emergency services and attend site.

A site appointed contact, as detailed on the roles list, would then attend site depending on availability and start to implement the FPP measures if safe to do so. They would be onsite to advise the fire service until the Site Manager, Managing Director, Group Operations Manager were able to attend site.



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4.4 Managing Fire Water

4.4.1 Containment of Fire Water Run Off

FPP guidance states that the site should have enough water available for fire-fighting to take place and manage a worst case scenario. The worst-case scenario in the FPP guidance would be the largest combustible catching fire. Appropriate measures states that BAT is providing sufficient containment which prevents cross-contamination or spread of fire through the drainage system. Both lower and upper yards now redesigned have capacity to hold well over the minimum recommended volumes of containment thanks to 750mm (lower yard), 500mm (transfer station) and 600mm (plastics recycling area) bunding installed as part of upgrades in 2023.

4.4.2 Worst case scenario fires

Area A:

The largest pile of combustible waste from Area A would be the flammable solid bay (A3), holding 40m³ maximum of waste material.

This would require 48m³ over a 3-hour period of water at a rate of 0.266m³/min.

The site with surface water tanks has available 119.36 m³ of water over a three-hour period.

The outer bunded area of area A highlighted in yellow has a capacity of 205m³ inclusive of the 25m³ tank within the offloading area before any of the storage bays are breached. This is with liquids to the height of the roller bunds in any storage bays just occupying the central offloading area.

Bay A3 additionally to this has its own containment of 6m³ prior to any of the fire water from this entering the main offloading area.

The Guidance in CIRIA report C736 indicates that an allowance of at least 100mm freeboard for foam should be in place. The bund wall heights are 500mm so after 200mm of fire water will flow into storage bays but not breach any tertiary containment walls but start to fill the original transfer station building (which is bunded) and the new transfer station storage bays.

Because of this freeboard requirement has been excluded for containment as the 500mm bund wall has only 200mm of liquid within it. The outer bund wall is 500mm around the whole of area A as a minimum.

To maximise the full tertiary containment in area A is well over double the 205m³ for filling area A as all storage bays will be filled and the original transfer station building so total capacity



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has been excluded as current containment and storage is well above minimum guidance levels.

Area B:

The largest pile of combustible waste in area B would be 90m³ of unwashed plastic containers. These would require 108,000L of water to extinguish in a 3-hour period (108m³). The site with surface water tanks has available 119.36 (m³) over a 3-hour period.

The outer bund of Area B is 600mm high. It has a capacity of 245.3m³ of containment excluding foaming agents before the outer bund wall is breached. There are 2 x 2m³ drainage sumps additionally to this.

Allowing for 100mm of foaming agents there is 208.5m³ of fire water containment.

The maximum possible rainfall within this area within a 24 hour period is (Storm Bert data of 40mm in 24 hours) x surface area (excluding building – 618m²) = 24.78m³

This means even if a fire were to occur during a storm event and no rainwater had been removed there would still be an additional 75.8m³ of capacity within the bund based on a maximum pile size of 90m³ allowing for 100mm of freeboard foaming agents.

Area C:

The largest pile of combustible waste in Area C would be 30.8m³ for the general waste skip. This would require 36,000l (36m³) of water to extinguish over a 3 hour period.

The site with surface water tanks has available 119.36 (m³) over a 3-hour period.

Area C drainage runs down with the fall of the site to the main bund wall at the bottom corner of the site below D12 (Annex A – Area D shows this). The total site containment in the lower yard tertiary bund even after a significant rainfall event (40mm in 24 hours) is in excess of 250,000L.

Area D:

The largest pile in Area D is Waste Oil Storage Tank T2. The Tanks are only ever filled to 90% of their volumetric capacity to allow for any discrepancies in Radar level gauge accuracy and prevent overfilling so there would be 62m³ of material within the tanks. Allowing for 6.667l/min water to extinguish the fire would require 72,003L (72.003m³) over 3 hours. The site has available 119,360L (119.3m³) in a 3-hour period. The tank bund has capacity to hold when

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displacement of tanks is removed is 176,000L. The anticipated volume to extinguish would be 134,000L to extinguish the fire. This would be contained within the bund. The bund dimensions are 16m x 10m and minus the displacements from the tanks this still allows >100mm clearance for fire-fighting foams and agents within the bund without the use of the site bunded containment.

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

Parameter and Units	Amount	Taken from
Litre/min/1m ³ of waste (l) ^a	6.667	
Largest combustible pile (m ³)	50	
Litre per minute required (l)	200	
Litres required over three hours (l)	60,003	
Discharge time for 70,000 litre tank	150 minutes	25 minutes to load vacuum tanker with 25,000L
Discharge time for 40000 litre tank	176 minutes	227L/Min using EODP -
Loading from Fire Hydrant at worst case flow rate of 52l/min (9,360 Litres)	180 minutes	Worst case hydrant discharge flow

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

Water can only be removed from any of the bunded areas by pumps and cannot manually be discharged. All bunded area are sealed and fire water cannot be discharged to the environment without operator intervention and turning on of fixed pumps. In worst case scenario mobile storage tanks (2 x 30m³) can be deployed by BKP if required for storage of additional fire water prior to testing and disposal. In an absolute worst case event IBC



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containers can be used for temporary storage of fire water if required and typically 30 x clean IBCs as a minimum are available onsite.

For all scenarios, BKP operate a fleet of tankers of our own tankers which can be filled at local Southern Water hydrants off site if required and directed by the fire service. The response will be overseen by the Site Manager, Managing Director (or Group Operations Manager in their absence) and co-ordinated by the Transport Manager. The Southern Water and Wessex Water sites and standalone hydrants which will be utilised will be:

- 1) Walworth Road (In bus layby outside 34A Walworth Road, Andover. SP10 5LH)
- 2) Barnes Wallis Road (layby of Barnes Wallis Road, Fareham, PO15 5TH)
- 3) Chickenhall Lane, Eastleigh, SO50 6RG
- 4) Morestead, Morestead Road, Winchester. SO21 1JB
- 5) Slowhill Copse, Bury Road, Marchwood, SO40 4UD
- 6) Holdenhurst STW, Riverside Avenue, Bournemouth. BH7 7ES
- 7)

Loading 25,000 litres onto a tanker takes approximately 60 minutes depending on pressure from hydrants. Typically hydrant pressures should be 2,100L/minute.

4.5 Incident Management

In the event of an incident, all waste will be diverted to a third-party operator. The operator will maintain a list of sites, "List of alternative sites in the event of an emergency". This will be stored on the shared drive and in the Fire Box located on the site gates.

In the event of a fire related incident the Emergency Services will be contacted. When safe to do so the Environment Agency will be contacted. In addition, depending on the nature/location of the fire, the emergency contact details will be used to notify utilities providers such Electricity Supplier.

The incident will be managed onsite by a designated person. Responsible people are; Site Manager, The Managing Director, Transport Manager, Group Operations Manager and Technical Director. The Site Manager or Technical Director are to ensure no fire water is discharged to the environment and the FPP is followed. Any breaches in control measures will be notified to the Environment Agency by the General Manager immediately.

Once the fire has been extinguished and the site has been deemed safe to enter, an assessment of the fire damage will be made. BKP will use a tanker to remove fire water. Any fire residues will be loaded into containers and removed from the site for disposal. Both the firewater and fire residues will be transported by registered carriers to permitted facilities.



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All plant and 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 detection system will also be checked by the installers to ensure that it is fit for purpose. Any repairs will be made in accordance with the manufacturer's recommendations.

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.

4.6 Post-Incident Management

4.6.1 Recovery procedure

After the fire has been extinguished the following actions would need to be completed. This would be the responsibility of the General Manager:

- Reporting serious fire to the environment agency the same day
- Investigation into the cause of the fire
- Review of the FPP
- Review of all staff training
- Replenishment of any fire extinguishers used
- Confirm in writing to the Environment Agency within 3 days the outcome of the fire, the actions taken by BKP and emergency services to control the fire and any other information deemed relevant

4.6.2 Clean Up

Fire water should be taken to a suitable licenced facility. BKP tankers can transport this, and sites must be made aware of the potential contaminants within the fire water, particularly if there is risk of POPs present. Samples must be sent in advance or analysis obtained where reasonably practical.

Debris / waste that can be identified, is suitable labelled / packaged and characterised and not >30 degrees can be moved offsite for disposal. The Transfer Station Manager will be responsible for clearing any stock required.



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After all fire water is removed the site will be cleaned by road sweeper. The residues then suitable treated (these may be suitable for treatment onsite depending on scenario or may only be suitable for third party disposal depending on the nature of the fire.

Drainage channels / gullies / bunds / buildings will be cleaned to remove contaminants.

Site will be jetted down.

Any buildings that have been damaged would be subject to review by independent structural engineers prior to use.

Once clean-up has been completed this will be signed off by Technical Director prior to site being deemed decontaminated and surface water being uncontaminated.

4.6.3 Investigation Procedures following clean up

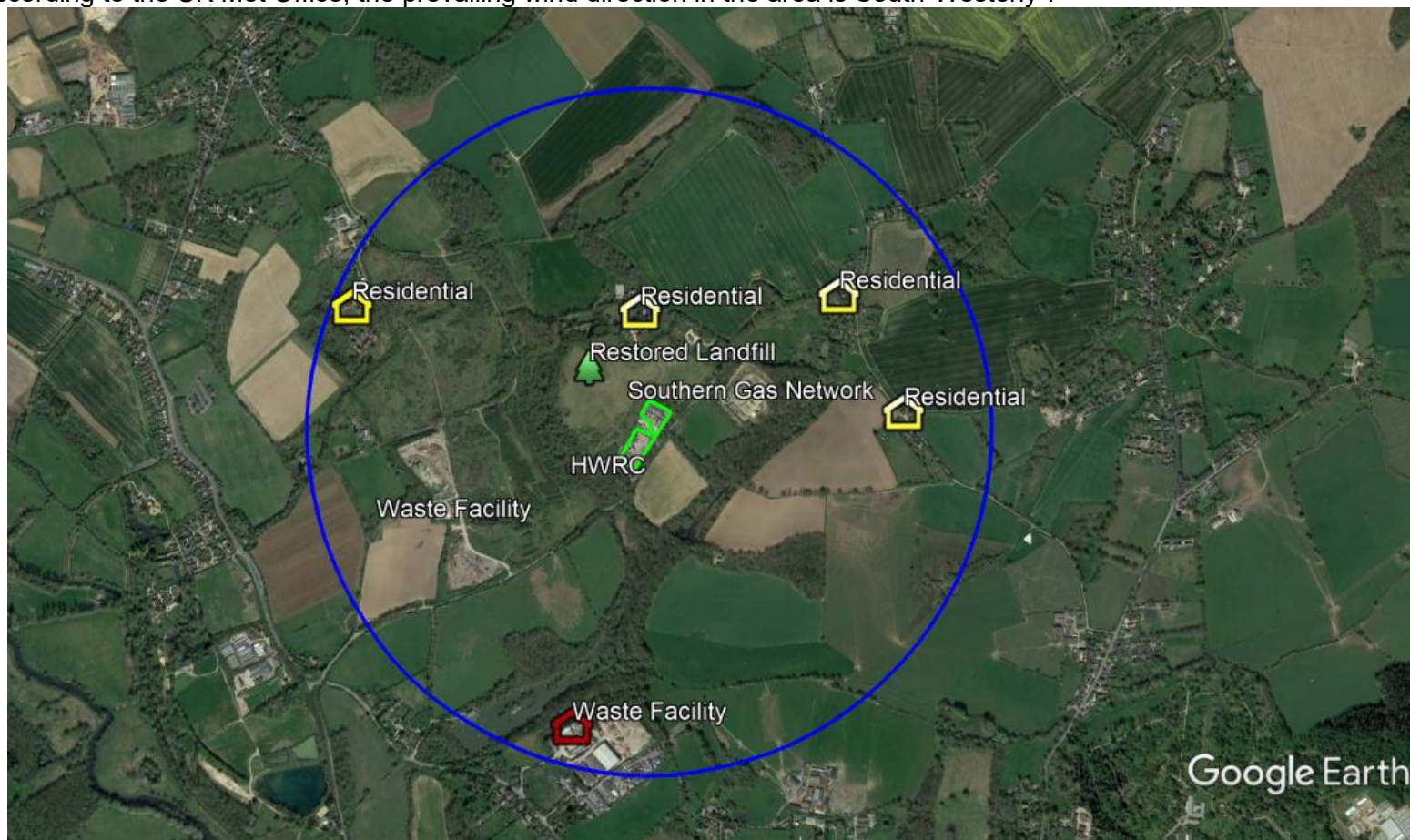
If any contamination exists or any areas of concern are identified then independent sampling will be completed to identify if any contamination has been caused. This would be sent to UKAS accredited laboratories and the sampling plan would be completed by the technical director / an appropriate consultant at their direction.

Following receipt of any analysis a proposal for remediating any contamination would be submitted in writing to the Environment Agency for Review with the sampling plan completed.

If approved the remedial works will be completed and following this additional analysis supplied by an UKAS accredited laboratory supplied to show the efficacy of these remedial works.

Annex A: Location of Key Receptors within 1 km of the site

Wind Direction According to the UK Met Office, the prevailing wind direction in the area is South-Westerly².



²<http://www.metoffice.gov.uk/climate/uk/regional-climates/so>

Annex B: Emergency Contact Numbers

Name & Address		Telephone Number
Environment Agency	General Enquiries: Incident Hotline Reporting:	03708 506 506 0800 80 70 60
Electricity Supplier & mains switch location	SSE – Mains Switch to adjacent of Site Offices, Lower Yard is Kiosk Marked on site plan in far corner , Transfer Station is adjacent to New building by Laboratory for isolation	0800 783 8866
Gas supplier & shut off valve location	No Gas Onsite	
Water supplier & shut off valve location	Lower Yard – Located next to Hydrant	
Local Authority Emergency Services	Test Valley Council, Beech Hurst Weyhill Road, Andover SP10 3AJ	01264 368000
Insurance Company and policy number	+44(0)1491 578759 ext: 201 - B19039320 Insurer: QBE Insurance	
Nearest large hospital with A&E department	Southampton General Hospital, Tremona Road, Southampton. SO16 6YD	023 8077 7222

Nearest Hospital	Romsey Community Hospital Winchester Hill, Romsey SO51 7ZA	023 8231 0350
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Annex C: Local Contact Numbers

Name & Address		Telephone Number
Pearl Mechanical, Budds Ln, Romsey SO51 0HA, Jim Wolfe	Fabrication, Mechanics, Vehicle Repairs	01794 278010
HP Pumps, Andy Bundy	Pump Repair	01794 367477, 07536098369
Southern Water, Mark Worsfold	sm_tankere@southernwater.co.uk ;	0330 303 0368, 07825 905144, 01273 666723
PWM – Electricians	Steve Maros, 109 Carnation Rd, Southampton SO16 3JH	023 8048 7768, 07717570839

Annex D Daily Inspection Sheets

: Completed By :
 Date & time of report : Job Title :
 Last Report : Site :
 Conditions

Transfer Station compliance checklist	Ye s	No	N/ A	Comments
External				
Gates and Fences – Secure from Walkround				
Access Road (cleanliness)				
Concrete condition on surrounding road N.B. identify areas for work on action plan				
Perimeter Drainage System free from debris / visibly clear				
Dust (walk the perimeter)				
Odour (walk the perimeter)				
Noise (walk the perimeter)				
Pests (evidence of infestation)				
Litter				
Check external condition of building – Note issues				
Offload area Bund free from waste and intact (Visually inspect to ensure capacity in sump)				
Cylinder cage locked and no material placed within 10m				
Skips filled to proper level				
No material stored against perimeter fence				
Combustible material >10m from buildings (including empty IBCs, pallets, wheelie bins)				
Internal				
Integrity of concrete floor				
Integrity of storage bays				
Fire extinguishers in place as per site plan				

Doors in full working order				
Fire exits are clear				
Evidence of vandalism (check windows and doors)				
All labels visible				
Walkways between all rows in bays				
Storage bays within capacity				
No spills or leaks				
Laboratory area is clean				
No trailing leads or plugged in devices etc				
FLT Daily checks completed by operators				
Stock take completed by senior site chemist				
Temperature Checks Completed across site (see temp check sheet) – OP11-DCL-02-Temperature Checks				
Temperature Checks WEEE shed				
Temperature Checks Battery Storage Shed				
Temperature Checks Lithium Battery Storage				
Temperature Checks General Waste / Other Skips				

Report : Completed By :
Details

Date & time of report : Job Title :
Last Report : Site :
Conditions

LTP compliance checklist	Ye s	No	N/ A	Comments
Yard:				
Gates and Fences – Secure from Walkround				
Access Road (cleanliness)				
Concrete condition on surrounding road N.B. identify areas for work on action plan				

Bund daily check completed – See bund inspection				
Dust (walk the perimeter)				
Odour (walk the perimeter – Must be completed while operational) - & Nature of odour				
Noise (walk the perimeter)				
Pests (evidence of infestation)				
Litter				
Check external condition of concrete – Note issues				
Drainage channels free from solids				
Storage bays for bulk solids within capacity				
Storage bays for packaged material within capacity				
AVCs labelled and within capacity				
Tanks <90% fill. If approaching >75% then action loads out				
Daily Plant checks completed – Telehandler, Excavator, FLT				
No trailing leads / plugged in devices				
Soakaway clear, with capacity				
Tanks / Bays Labelled				
Office:				
Laboratory area is clean				
No trailing leads or plugged in devices etc				
FLT Daily checks completed by operators				
Stock take completed by chemist				
Temperature Checks on Rags Completed OP11-DCL-02-Temperature Checks				
Temperature Checks Remainder of storage completed				