HALESFIELD HAZARDOUS WASTE STORAGE INSTALLATION ENVIRONMENTAL PERMIT APPLICATION

Fire Prevention Plan

Prepared for: AO Recycling Limited

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1.0 Introduction

1.1 Report Context

AO Recycling Limited (AO) has instructed SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application for the proposed Hazardous Waste Storage Facility in Telford under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

This report follows the Environment Agency (EA) guidance for Fire Prevention Plans (FPPs)[1] and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

The information contained within this FPP is presented in accordance with the EA's FPP template published January 2020 and is designed to meet the 3 main objectives of the EA FPP Guidance:

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

2.0 Types of Combustible Materials

2.1 Combustible Waste

The site proposes to store 3,000 tonnes of hazardous waste at any one time. It is therefore anticipated that the site would be regulated under the Environmental Permitting (England & Wales) Regulations 2016 as a hazardous waste storage installation under the following provision:

SECTION 5.6 Temporary or underground storage of hazardous waste Part A(1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section.

Non-hazardous waste is regulated as a waste activity under the Waste Framework Directive and therefore waste management activities to be carried out on site are as follows:

- R13: Storage of wastes pending any of the operations numbered R1 to R12.

The site layout, including waste storage locations is shown on Drawing 002.

The EP allows for the following types of waste to be accepted on site which are defined as 'combustible materials' in the FPP Guidance[1]:

- Waste Electrical and Electronic Equipment (WEEE).

The full list of wastes permitted for acceptance to the site is included within Table 2-1 below. However, the site will only accept whole, end-of-life fridges, whole components of fridges or plastics derived from the treatment of end-of-life fridges.

[1] Fire Prevention Plans, January 2020.

Table 2-1
List of Permitted EWC Codes

EWC Code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 02	wastes from electrical and electronic equipment
16 02 09*	transformers and capacitors containing PCBs
16 02 10*	discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09
16 02 11	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02.13
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 10	wastes from shredding of metal-containing wastes
19 10 06	other fractions other than those mentioned in 19 10 05
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 04	plastic and rubber
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) SEPARATELY COLLECTED FRACTIONS (EXCEPT 15 01)
20 01	separately collected fractions (Except 15 01)
20 01 23	discarded equipment containing chlorofluorocarbons
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

2.2 Other Combustible Waste

The site stores non-waste materials that are not covered by the FPP Guidance but are considered in this FPP due to the potential for them to cause or increase the impact of a fire on the site. The materials and their storage arrangements are shown in Table 2-2 below and illustrated on Drawing 002.

Table 2-2
Non-Waste Materials: Storage Arrangements

Type	Storage Location	Storage Arrangement
Fuel Storage (diesel)	Designated diesel storage in the northeast corner of the site	Containers surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.
Oil Storage	Designated oil storage in the northeast corner of the site	Containers surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.

3.0 Using this FPP

3.1 Where the plan is kept and how staff know how to use it

A copy of this FPP is kept in the Site Manager's office and the Shift Manager's office.

All staff will be made aware of the contents of the FPP and the procedures that are in place in the event of a fire on Site during their induction and through periodic refresher training. Contractors working on Site will be made aware as part of on-site working procedures.

3.2 Testing the plan and staff training

3.2.1 Staff training and procedures

Staff receive training on the use and selection of fire extinguishers, the sump shut-off valve, site evacuation, fire safety and all relevant emergency procedures.

All staff and contractors working on site are made aware of the contents of the FPP and the procedures that are in place in the event of a fire on site during their induction. The staff training is regularly refreshed particularly in the event of non-compliance.

Certain staff members on site are trained as Fire Marshals. There is always at least one Fire Marshal present on site.

The procedures for fires discovered on site are provided both in AO's EMS and on-site notice boards.

AO conduct a test of the FPP once a year, or in the event of any significant changes to site operations, to ensure that the contents are still relevant and that all staff members' knowledge is current and up to date.

3.2.2 Testing the FPP

This FPP will be implemented across the Site and all fire management equipment will be maintained in line with schedules set by AO.

A fire drill is carried out and documented on a 6 monthly basis.

This FPP is implemented across the site and all fire management equipment is tested on an annual basis.

If any issues are found during these fire drills, the FPP will be updated or amended accordingly and site operatives will be re-trained.

Regular checks are made of all escape routes and equipment.

4.0 FPP contents

4.1 Activities at the site

The site is permitted as a hazardous waste storage installation. The purpose is to provide temporary storage of refrigerator appliances and bagged WEEE components derived from domestic appliances, before transfer off-site to suitable treatment facilities. This is a business continuity provision to ensure that capacity limits at the treatment sites are not exceeded in the event of breakdowns or seasonal variations in the waste arisings.

4.2 Site Plan

The Site is centred on National Grid Reference SJ 70955 04334 on Halesfield 13, Halesfield Industrial Estate, Halesfield, Telford, TF7 4PL and is approximately 3km east of Ironbridge, and 5km southeast of the Telford. The Site is accessed via Halesfield 14 Road, which leads to the A442 approximately 175m south west.

The Site location is illustrated on Drawing 001. The Site boundary is shown on Drawing 002, with the local receptors and cultural and natural heritage receptors illustrated on Drawing 003 Environmental Site Setting.

4.3 Plan of sensitive receptors near the site

The Site is located in the Halesfield Industrial Estate and is surrounded on all sides by commercial/industrial premises. A band of residential premises are present approximately 280m to the west of the site.

A summary of the immediate surrounding land use is provided in Table 4-1.

Table 4-1
Surrounding Land Use

Direction	Land Use
North	Adjacent to the north of the site is commercial/industrial premises with open ground beyond.
East	To the east of the site is commercial/industrial premises.
South	Adjacent to the south of the site is commercial/industrial premises with small pocket of open ground beyond.
West	To the west of the site is commercial/industrial premises, the A442 and residential premises and Haughton School beyond.

The immediate surrounding land use is described in detail below.

4.3.1 Allotments

To the south of the site is a small allotment located approximately 400m from the site's EP boundary.

4.3.2 Commercial and Industrial

Adjacent to the north, east, south and west of the site is commercial/industrial premises because the site is located within Halesfield Industrial Estate. Ambroplastics is to the north, Retail Furniture to the east, Torque

Tyres to the south and Telford Fabrications to the west of the site. To the north and west of the site within 1km is Halesfield Industrial Estate.

4.3.3 Local Transport Network

The site is located within Halesfield industrial Estate and is therefore connected to the Halesfield Industrial Estate road network. Halesfield 13 road lies adjacent to the north and Halesfield 14 road to the east of the site. Brockton Way (A422) is located approximately 155m to the east.

4.3.4 Open ground

There are multiple pockets of open ground within 500m from the site's EP boundary, predominately to the north and west. Within 1km from the sites EP boundary there is a large area of open ground to the west and south.

4.3.5 Educational

There is one educational receptor within 500m of the site, Haughton School located approximately 290m west of the site.

4.3.6 Residential

To the west of the site is a band of residential properties, located approximately 280m from the EP boundary. There is one residential property approximately 785m to the northeast of the site's EP boundary.

4.3.7 Recreational

There are two recreational facilities within 1km of the site's EP boundary. To the west, approximately 545m is the Venue Social Club and to the south, approximately 575m is an unnamed recreational facility.

4.3.8 Surface Water

There are three small surface water features within 500m north of the site. The Mad brook River is approximately 562m to the southeast of the site.

4.4 Ecology

A 1km radius was employed in identifying all ecological receptors of importance with the exception of Sites of Special Scientific Interest (SSSI), for which a 2km radius is recommended under EA draft guidance[2]. A search on MAGIC identified that there is one feature of ecological importance within the vicinity of the site:

- Madeley Local Nature Reserve (LNR), located approximately 780m west and 720m north west of the site.

Searches on MAGIC confirmed there are none of the following within 1km of the EP boundary:

- Areas of Outstanding Natural Beauty (AONB);
- National Nature Reserves (NNR);
- Ramsar;
- Special Areas of Conservation (SAC);
- Special Protection Areas (SPA);
- Biosphere Reserves;

[2] EA Draft guidance 'How to complete a location check in Opra' 2011

- RSPB Reserves; or
- Ancient Woodland.

Searches on MAGIC confirmed there are no SSSI within 2km from the Site's boundary.

4.4.1 Cultural Heritage

Searches on MAGIC identified the following within 1km of the EP boundary:

- 4 Grade II listed buildings to the west, approximately 1km from the EP boundary; and
- Ironbridge Gorge, World Heritage Site located approximately 930m to the west

Searches on the MAGIC Map confirmed there are none of the following within 1km of the EP boundary:

- Registered Parks and Gardens;
- Registered Battlefields; and
- Scheduled Monuments.

4.5 Receptors

Local receptors and natural and cultural receptors within 1km of the Site are recorded in Table 4-2.

Table 4-2
Identified Receptors

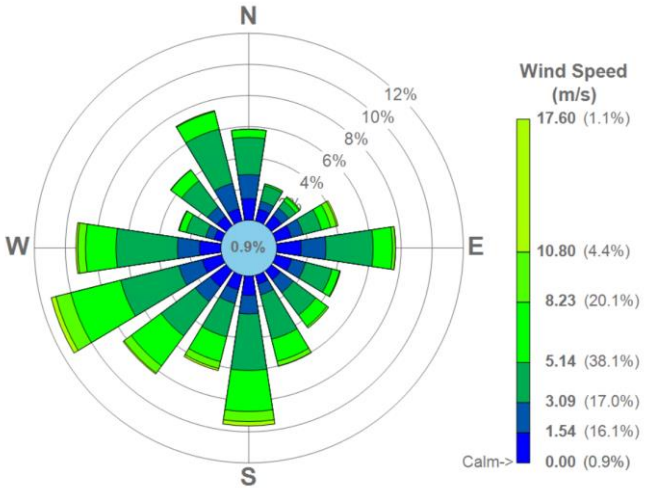
Receptor Name	Type	Direction	Approximate Distance from the Site Boundary (in metres)
Local Receptors within 1000m as illustrated on Drawing 003			
Halesfield 13	Local Transport Network	North	Adjacent
Torque Tyres	Halesfield Industrial Estate	South	Adjacent
Halesfield 14	Local Transport Network	East	Adjacent
Telford Fabrications	Halesfield Industrial Estate	West	Adjacent
Ambroplastics	Halesfield Industrial Estate	North	25
Retail Furniture	Halesfield Industrial Estate	East	30
Open ground	Open ground	North and west	105
Brockton Way (A442)	Local Transport Network	East	155
Residential Properties	Residential	West	280
Haughton School	Educational	West	290
Allotment	Allotment	south	400
The Venue Social Club	Recreational Facility	West	545
Madbrook River	Surface water feature	Southeast	562
Recreational Facility	Recreational Facility	South	575
Residential	Residential	Northeast	785
Cultural and Natural Heritage Receptors			

Receptor Name	Type	Direction	Approximate Distance from the Site Boundary (in metres)
Madeley	LNR	Northwest and west	720 and 780
Ironbridge Gorge	World Heritage Site	West	930
Listed buildings	Listed Building	West	1000

4.6 Windrose

A wind rose from Shawbury Meteorological Station, located approximately 24km northwest, providing the frequency of wind speed and direction from 2018 is presented in Figure 1-1 below. The wind rose shows that winds from the south western and west are most frequent. Winds from the west, north west and east are less frequent.

Figure 4-1
Shawbury Meteorological Station, 2018



5.0 Manage common causes of fire

5.1 Arson

The site is enclosed by security fencing and site entrance gates designed to prevent unauthorised access. Security lighting is also located around the site.

During non-operational hours, the site benefits from CCTV which is monitored remotely from AO's Halesfield 15 site 24 hours a day. In addition, the site is fitted with an alarm system with manually activated call points.

The gates and fencing are inspected weekly to identify any weaknesses or defects. Any defects identified are repaired with a temporary solution within 24 hours, with a permanent fix implemented within 7 days, unless a timescale is otherwise agreed with the EA.

All doors to buildings are locked when not in use and the processing building is protected by a monitored alarm system.

The site has a number of additional security measures in place to limit the likelihood of arson or vandalism including:

- Lockable doors on the building and office/welfare facilities;
- Inspection and maintenance procedures; and
- A visitor sign in system via AO's reception at Halesfield 15.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the Daily Site Log. Records maintained will include inspections and maintenance of doors and locks, breaches of security, investigations and actions taken.

5.2 Plant and equipment

Plant and equipment are maintained in accordance with the manufacturer's recommendations. All new plant on site is fitted with telematics, which automatically highlights any faults, and local suppression as part of the minimum design specifications.

Plant and equipment are operated in accordance with the manufacturer's instruction manuals. Instruction manuals for plant and equipment are held either on site or online if a hardcopy is not available from the manufacturer.

Induction training and refresher training is provided to staff in the safe operation of plant and equipment relevant to their role, in accordance with the EMS.

Inspection of plant and equipment is undertaken on a daily basis to check for faults and ensure appropriate safeguards are in place. The procedure also covers general housekeeping and cleaning of plant and all equipment on site.

In the event of a failure or suspected fault with an item of plant or piece of equipment, the operator will ensure that the equipment is shut off in a safe manner and not used until the equipment can be repaired or replaced.

5.2.1 Fixed equipment

There will be no fixed plant or equipment on site as the site is for storage only.

5.2.2 Mobile plant

The following items of mobile plant are held on site:

- 2 x forklift trucks

The machinery is maintained in line with AO's maintenance procedure: Operating Procedure 04 - Maintenance. All plant and equipment receive annual Lifting Operations and Lifting Equipment Regulations (LOLER) and Provision and Use of Work Equipment Regulations (PUWER) inspections.

In summary, the following provisions are implemented:

- Plant maintenance schedules using the manufacturer's recommendations;
- Pre-use checks prior to using any plant or equipment;
- Reporting of defects and actions taken based on priorities;
- Daily cleaning to remove any dust build up from vulnerable areas;
- All vehicles onsite are fitted with portable fire extinguishers; and

- Mobile plant is kept away from combustible waste. This is achieved by allocating areas for mobile plant for storage when not in use.

Any mobile plant not in use or requiring maintenance is temporarily stored in the designated parking area. There is no waste storage within buildings therefore the mobile plant storage area is located at a distance of over 6m from any combustible waste.

5.3 Electrical faults including damaged or exposed electrical cables

5.3.1 Electrical certification

All electrics on Site will be fully certified by a qualified electrician and a record of the certification will be kept.

5.3.2 Electrical equipment maintenance arrangements

Regular safety inspections will be carried out by a qualified electrician to ensure risks are minimised. Electrical equipment will be visually inspected prior to every use to ensure is free from obvious damage and that it is fit for purpose. Regular safety checks and daily site inspections are recorded in the site diary. All building electrics are fully certified by a qualified electrician.

Fixed Electrical Condition Monitoring and assessment is completed via 100% testing every 3 years.

Annual PAT testing of any on site portable electrical appliances is carried out.

5.4 Discarded smoking materials

5.4.1 Smoking on site policies

Smoking is not permitted on Site due to the combustible nature of materials stored on Site. Any smoking must be conducted outside of the Site permit boundary.

5.5 Hot works safe working practices

It is unlikely that hot works will take place at the installation as it is for storage purposes only. In the event that hot works are carried out, AO operates a permit to work system which includes a 60 minute fire watch by a competent person at the end of the works. No hot works are undertaken by staff unless they are trained and competent and have the relevant permit to work understanding.

Any works take place at least 6m from any combustible wastes. A site operative performs a continuous fire watch during the hot work and for a minimum of 60 minutes after the work is completed.

5.6 Industrial heaters

5.6.1 Use of industrial heaters

No portable heaters are to be utilised on Site. Wall mounted convection heaters will, however, be provided in the office and welfare areas. The Site Manager will ensure the heater is switched off when an area is not in use.

5.7 Hot exhausts and engine parts

Vehicles are turned off when not in use. Consideration will be given to the high-risk time for hot exhausts (one hour after switching off when dust can settle on hot surfaces) and wherever possible vehicles are given time to cool down prior to site staff leaving site at the end of a shift.

5.8 Ignition sources

Potential ignition sources include hot exhausts and engine parts, discarded smoking materials, heaters and hot works (all described above). All ignition sources will be kept a minimum of 6m away from the storage of combustible and flammable wastes. No naked lights will be permitted on Site.

5.9 Leaks and spillages of oils and fuels

Inspection of any spillages or leaks from containment will be completed at least once per a shift by the shift supervisor. The results of all daily and weekly monitoring will be recorded in the Site Diary, as well as any remedial actions.

In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately, any resulting waste placed in containers for offsite disposal, and the EA will be informed.

5.10 Build-up of combustible waste, dust and fluff

The risk of diffuse emissions to air of dust, organic compounds and odour is low due to the nature of the wastes accepted on site. Wastes accepted on site are not expected to be odorous in nature.

- All incoming waste is offloaded in close proximity to the storage bays to minimise unnecessary handling and transport distance therefore minimising the potential for wind-borne dust.
- All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer. This will include corrosion prevention where applicable.
- The risk of fugitive dust emissions is low, as the site does not process waste or produce dusty wastes. Nonetheless, the site implements the following measures to control risk of dust:
    - Waste that arrives within enclosed vehicles, if possible, to ensure no escape of dust during transit;
    - Waste is stored in dedicated external storage bays which will minimise the mobilisation of dust (if any is present);
    - Storage areas benefit from regular cleaning, on a daily basis as a minimum;
    - Handling of fridges is kept to a minimum;
    - Speed limits are implemented on Site for all vehicles to minimise the mobilisation of particulates;
    - Site access roads and operational areas are maintained and swept regularly to reduce dust generation;
    - Daily visual inspection of the Site and Site boundary is carried out by Site personnel.
- All plant and equipment is subject to a programme of planned preventative maintenance which follows the inspection and maintenance schedule recommended by the manufacturer.

5.11 Reactions between wastes

The site does not accept waste types which are potentially incompatible with each other. To ensure that incompatible materials are not received on site, waste is offloaded at the site supervised by suitably qualified site operatives. Where possible, any non-conforming waste that is received will not be unloaded and will be rejected. However, where exceptions arrive unknowingly (i.e. inside fridges etc.), these will be put into isolated 'quarantine' storage for removal from the site. Unacceptable waste is returned to the originator or to an authorised disposal company within 5 days.

Only vehicles that are accompanied by the correct documentation are accepted onto site. Waste undergoes a visual inspection at the point of deposit into the bays.

Tanks containing fuel are constructed so that any leaks/spillages are contained. Tanks are surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest tank within the bund. Bunds are impermeable and resistant to stored materials.

5.12 Deposited hot loads

No burning, reactive / reacting or visibly hot (producing steam or heat) loads are accepted on site. In accordance with the Waste Acceptance Procedure included within Section 2.2, each load is visually inspected at the site entrance to ensure compatibility with accompanying delivery notes, therefore minimising prohibited wastes and the acceptance of hot loads.

Instructions are given to suppliers to ensure no hot loads are accepted on site.
Should a hot load be deposited on site, it will immediately be removed to the dedicated quarantine area and removed from site the same day to a suitably licenced facility for disposal.

6.0 Prevent self-combustion

6.1 General self-combustion measures

Effective stock management limits the likelihood of the self-combustion of materials stored on site. As such, the site has waste acceptance and stock management procedures which are upheld by all employees at the site.
Waste will be accepted in line with Operating Procedure 01 – Acceptance of Hazardous Wastes. All waste brought onto site is inspected to ensure is has been consigned correctly.

The controls in place to reduce the risk from fire are summarised as follows:

- All deliveries are checked on arrival. Checks include both the paperwork and the full contents of the load;
- No loads are removed without an onsite operative in supervision;
- A visual fire watch is performed as the loads are received and unloaded;
- A quarantine area is kept available; and
- Waste is handled in accordance with a safe system of work. Care is taken to ensure the cooling circuits are not damaged during the unloading and transport of WEEE waste. On site personnel will be instructed and trained on the safe system of work.

Where identified during initial inspections, non-conforming waste that is received will not be unloaded and will be rejected. However, where exceptions arrive unknowingly (i.e. inside fridges etc.), these are reported to the

site manager, who must record the details, and then the items are pulled out and put into isolated '*quarantine*' storage for removal from the site. Unacceptable waste is returned to the originator or to an authorised disposal company within 5 days. Any quarantined waste will be detailed.

Only wastes included in the EP are accepted at the site.

Non-waste materials that pose a risk of self-combustion are stored as indicated in Table 2-2.

6.2 Manage storage time

A summary of the different storage times for wastes received is provided in Table 6-1 below.

Table 6-1
Maximum Storage Times

Waste Received	Storage	Maximum Storage Time
Fridges	To be stored on their backs, a maximum of 3.8m high. Protuberances on the back of the appliances ensures no pressure is put onto the cooling circuit.	6 months
Defective fridges	To be stored on their side with doors facing inward, to ensure no pressure is put onto the cooling circuit.	5 days
WEEE Components	Flexible Intermediate Bulk Containers, stacked a maximum of 3.8m high.	6 months

6.2.1 Method used to record and manage the storage of all waste on site

All waste brought onto site is inspected to ensure it has been consigned correctly. Waste storage inventory is monitored, and the storage dates are recorded on a site plan and an excel spreadsheet, which is monitored by the site manager.

Suitably qualified Site personnel will carry out daily checks of the Site to identify the risks and inspect bays and stack height. This ensures that the Site does not reach a level of overcapacity in respect to storage.

6.2.2 Stock rotation policy

Arrangements on site ensure a 'first in first out' approach is adopted so that storage of waste does not exceed the prescribed duration. The site manager is responsible for stock rotation on site and ensures that waste with the earliest storage dates are transferred to AO's treatment sites when required. The site manager will also notify the treatment sites if any stored waste is approaching the maximum duration limit so that arrangements can be made to transfer the waste for processing.

The aim with all waste on site is to move it off site as soon as there is capacity at AO's treatment sites.

6.3 Monitor and control temperature

6.3.1 Reduce the exposed metal content and proportion of fines

The proposed waste intended for storage at the site does comprise metal (ie fridge casings). However, these are entire units rather than mixed waste of small particle size and therefore will not present the same risk as other types of metal waste. There is unlikely to be any waste containing fines accepted on to site. Strict waste

acceptance checks are carried out to ensure that only permitted waste is allowed to be accepted on site. Loads are visually inspected upon arrival and after deposit into the storage bays. Any loads found to be contaminated will not be accepted and will be reloaded on to the delivery vehicle and returned.

6.3.2 Monitoring temperature

On a daily basis, at least twice per shift, during operational hours, site operatives will inspect the storage bays for any anomalies, such as visual signs of heat, steam or vapour. Anomalies are actioned immediately by investigation and remedial action will be taken such as rotation of the waste within the storage bay or removal of heated waste, which will be put in the quarantine area for assessment.

6.3.3 Controlling temperature

The following actions will be taken to reduce the risk of hot spots and to minimise the risk of self-combustion:

- Waste storage times are minimised by using first-in-first-out basis;
- Risk factors (e.g. mixing of materials) are reduced; and
- Waste storage area sizes are minimised.

6.3.4 Dealing with hot weather and heating from sunlight

Waste stored on site consists of end-of-life fridges and materials derived from end-of-life domestic appliances. The fridges and bagged WEEE tend to be light in colour which will not absorb heat and they also have a large 'particle' size which means they are unlikely to form hot spots. Therefore, it is considered that they pose a relatively low risk of heating from hot weather and sunlight.

Nonetheless, during periods of extreme hot weather (defined as temperature higher than 30°C or more on two consecutive days) the frequency of inspection will be increased to four times per shift.

6.4 Waste bale storage

There is no waste stored in bales on site.

7.0 Manage waste piles

7.1 Maximum pile sizes for the waste on site

Waste storage takes place externally to any buildings on impermeable concrete surfacing within bays. The number of waste storage bays will be confirmed upon construction but each bay will be 4.8m in height with waste stored up to a maximum of 3.8m in height allowing for a 1m freeboard. The width and length of each bay will vary, but neither the length nor the width of the bay will exceed 20 metres. In line with guidance, the maximum pile sizes will not exceed 450 cubic metres.

A summary of the waste storage dimensions and volumes are shown in Table 7-1 below.

Table 7-1
Bay Storage Areas: Waste Types and Dimensions

Waste Type	Maximum Length (m)	Maximum Allowable Width if Length is 20m (m)	Height (m)	Maximum Area (m^2)	Max Volume (m^3)
Fridges/WEEE	20	5.8	3.8	116	441

The width of a bay can be wider than 5.8m if the length if the bay is less than 20m, but the maximum area will not exceed 116m^2. Waste storage bay dimensions will be confirmed upon construction.

7.2 Storing waste materials in their largest form

The activities at the site is storage only; no size reduction is involved.

8.0 Waste stored in containers

There is no waste stored in containers on site.

9.0 Prevent fire spreading

9.1 Separation distances

Waste will be stored within bays as illustrated on Drawing 002. Separation distances within the bay storage area will be reduced due to the fire wall construction as detailed below in section 9.2. The waste storage bays will be at least 6m from the perimeter, buildings and other combustible or flammable materials as illustrated on Drawing 002.

9.2 Fire walls construction standards

Waste will be stored within bays surrounded by Legato A1 fire-resistant concrete blocks. These will not burn, crack or give off noxious fumes regardless of the intensity of the fire or time spent being exposed to the fire. The blocks are Class A1 fire resistant in accordance with clause 4.3.4.4 of EN 13369.

The specification is shown in Table 9-1 below.

Table 9-1
Bay Wall Specification

Features	Details
Concrete Specification	RC40/50XF equivalent
	Minimum cement content = 360 kg/m3
	Maximum w:c ratio = 0.45
	Cement type = CEM1 52.5N

Features	Details
	Coarse Aggregate = Aggregate Industries
	Fine Aggregate = Cemex
Durability	The use of an RC40/50XF equivalent concrete ensures suitability for use in XF4 conditions as defined in BS 8500-1:2013
The units are unreinforced and have a design working life of 100 years as defined in BS EN1990:2002+A1:2005	

9.2.1 Storing waste in bays

The waste within the bays will be stored to the maximum heights shown in Table 7-1. The following measures will be employed to minimise the risk of fire spreading:

- All waste in the storage bays will be operated on a first-in-first-out basis.;
- Storage times kept to a minimum;
- The specification and construction of the bays offers a thermal barrier exceeding 4 hours;
- The bays benefit from a freeboard of 1m and open faces are located at least 6m from other sources of combustible materials to minimise the potential risk of lighted material igniting other wastes; and
- In the event of a fire occurring in a bay, the quarantine area will be used to segregate non-burning waste in order to isolate and minimise the potential impact of the incident.

10.0 Quarantine Area

10.1 Quarantine area location and size

The site benefits from a quarantine area for fire management and non-compliant waste

The locations of the quarantine area is illustrated on Drawing 002 and detailed in Table 10-1 below.

Table 10-1
Quarantine Area Dimensions

Quarantine Area	Primary Use	Length (m)	Width (m)	Height (m)	Volume (m^3)
Fire Prevention	Dousing of burning/smouldering waste and/or separation of unburnt waste.	20	5	3.8	380

10.1.1 Non-compliant Waste Quarantine Area

In the event of non-compliant waste being identified within the waste load, the vehicle will be requested to remove the load off site immediately. If the vehicle has already unloaded the waste, it will be moved to the quarantine area and removed off site within 72 hours.

10.1.2 Fire Management Quarantine Area

The fire management quarantine area benefits from fire-resistant bay walls and holds at least 50% of the largest waste storage area on site.

The placement of the quarantine area is based on the following factors:

- It allows for the prompt and direct removal of smouldering, burning or fire damaged wastes from the waste storage and to allow access by the Fire Service;
- Proximity to flammable liquids – the quarantine area is situated at least 6m from any potentially flammable liquids on site such as diesel tanks; and
- Firewater containment – the quarantine area is in the north of the site close to the containment wall therefore any firewater used in this area will be sufficiently contained.

10.2 How to use the quarantine area if there is a fire

The Goods in/out Manager will instruct all site operatives when and how the burnt/burning waste, or any hot loads delivered accidently to site, will be moved to the quarantine area. The following procedure will be implemented on site:

- When it is safe to do so, the waste will be moved by on site plant to the quarantine area;
- The movement of the waste will be overseen at all times by the Site Manager to minimise any spillages and ensure the area is not overfilled;
- To limit any spillages, plant will not be overfilled when moving the waste;
- The burning/smouldering waste will be doused using the relevant fire extinguisher, a fire hose supplied by the fire service connected to the hydrant, mains water point or water pumped from the fire engine; and
- Burnt waste will be taken off site to a suitably permitted facility within 48 hours.

All site operatives will be trained to follow this FPP and all procedures listed in the above sections.

10.3 Procedure to remove material stored temporarily if there is a fire

In the event of non-compliant waste being identified within the waste load, the vehicle will be requested to remove the load off site immediately. If the vehicle has already unloaded the waste, it will be moved to the quarantine area and removed off site within 72 hours. In the event of a fire any non-compliant waste temporarily stored in the quarantine area will be relocated to Halesfield treatment facility, located within Halesfield Industrial Estate. Due to the close proximity of the Halesfield treatment facility, temporarily stored waste within the quarantine area will be able to be moved immediately or within one hour of a fire starting.

11.0 Detecting fire

11.1 Detection systems in use

Daily visual inspections of the waste storage bays take place to ensure the early detection of fires in waste storage areas.

In addition, the site is 24hr monitored using CCTV. The cameras are fitted so that the whole site can be monitored (focusing on the waste storage bays).

A third party has been selected and is responsible for CCTV and 24hr monitoring. In addition, the site is fitted with an alarm system with manually activated call points. Site boundary checks are completed weekly to ensure site security is maintained and the risk of arson is reduced.

11.2 Certification of systems

Not applicable due to there being no storage of waste within a building.

12.0 Suppressing fires

12.1 Suppression systems in use

There is no storage of waste within a building therefore an automatic fire suppression system is not required on site.

The locations of all fire extinguishers on site will be determined following a site review and inspection from a Fire Prevention Consultant. Foam, water, carbon dioxide and powder extinguishers will be provided on site and inspected annually.

12.2 Certification of systems

Not applicable due to there being no storage of waste within a building.

13.0 Firefighting techniques

13.1 Active firefighting

13.1.1 Fire extinguishers

The closest fire station is Shropshire Fire and Rescue Service (FRS) to the north west of the site. Using Google directions and mapping [3], the drive time is approximately 2 minutes and it is approximately 0.7 miles between the site and the fire station.

Outside of operational hours, the CCTV is monitored remotely 24hours from AO Recycling's Halesfield site, who are responsible for alerting the FRS.

See section 12.1 for details on fire extinguishers. Fire extinguishers are to be used in the following circumstances:

- Where operators are trained in use, and if confident to tackle the fire;
- on very small fires, or to facilitate own escape if trapped by fire.

13.1.2 Small Fire

A small fire or area of smouldering waste will be dealt with as follows:

- A fire or area of smouldering waste will not be dealt with in-situ, mobile plant will be utilised to pull the affected waste into the open and away from any further waste that could become a light on contact; and
- Depending on the size / nature of the fire the waste will either be:

[3] Google Maps, Accessed in December 2020

- Extinguished immediately[4] utilising the fire extinguishers; or
- Moved to the appropriate quarantine area and extinguished[5].

Depending on the size, location and nature of the fire the burning waste will be pulled into the dedicated fire prevention quarantine area following the procedures detailed in Section 3.7.1.

Once a small fire is dealt with the remaining area will be visually inspected immediately by site operatives for any signs that a fire / smouldering waste still remains. The same procedure, detailed in this Section, will be implemented should this be the case.

13.1.3 Uncontainable Small Fire or Large Fire

The following procedure is in place on site that will be followed in the event of a small fire becoming uncontainable or in the event of a major fire onsite;

- The Site Manager and FRS will be contacted immediately. The local sewerage service and EA will be notified at the first opportune moment.
- Following arrival of the FRS, all site staff will take instructions from the FRS which may include any of the following:
  - If possible, waste that is unburnt will be dampened down to prevent the fire from spreading further;
  - If possible, unburned material will be separated from the fire using heavy plant;
  - The burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
  - The site and buildings will be evacuated.

14.0 Water supplies

14.1 Available water supply

Sources of water available onsite are:

- The on-board water supply from FRS vehicles; and
- 3 x Hydrants (flow rate: 1,200 litres per minute) located as follows:
  - Halesfield 13 (east);
  - Halesfield 13 (west); and
  - Halesfield 14 (south).
- Mains water point on site (flow rate: 10 litres per minute).

[4] Should a single item of the waste stream be alight, and the fire is well contained, then the waste will be doused via use of an extinguisher as it is pulled from the waste pile. The burned / fire- damaged portion is then removed to the quarantine area and the remaining waste returned to the pile.
[5] If the fire is not easily contained to a single item, then the obviously alight portion of the waste will be removed to the quarantine area.

Based upon the FPP guidance firewater calculations, it is estimated that approximately 529,380 litres (529m^3) of water would be required to put out the largest combustible stockpile on site[6].

The hydrants located in close proximity to the site are 180mm nominal diameter, enabling the required pressure for the site and the 3000 litres required per minute to deal with the worst case scenario. Checks are completed every four years by Shropshire Fire and Rescue and were last checked in 2018. The hydrants were installed throughout the Halesfield Industrial Estate to deal with a range of scenarios.

Maximum pile volume (m^3)	Water supply needed (l/min)	Overall water supply needed over 3 hours (litres)	Total water available on site (l/min)
	Pile volume x 6.67	Water supply x 180	
441	2,955	531,846	3,610

15.0 Managing fire water

15.1 Containing the run-off from fire water

The site has the benefit of impermeable surfacing throughout. Site drainage and containment measures are shown on Drawing 002.

The waste storage area is bounded on three sides by breeze block walls and on the fourth side by impermeable raised concrete kerbs (15cm) which forms an impermeable bund, as illustrated on Drawing 002. This creates a containment within the site for firewater

16.0 During and after an incident

16.1 Dealing with issues during a fire

The site will not continue to accept waste is there is an active fire on site. Waste will be diverted to AO's nearby fridge treatment facility and, if possible, waste producers will be notified in advance to prevent delivery vehicles arriving on site during and immediately after a fire.

16.2 Notifying residents and businesses

An emergency contact sheet is included in Appendix 02. In the event of a fire the following procedure will be followed:

- The Site Manager or individual nominated by the Site Manager will locate the emergency contact list included in Appendix 02;
- In the event of a large fire, 999 will be dialled first;

[6]Based on a 441m^3 bale stockpile being the largest combustible pile on site and it requiring 6.7 litres of water per cubic metre to extinguish. 6.7 * 441 = 2,955 litres/min. 2,955 * 180 = 531,846 litres/3 hours.

- The Site Manager or individual nominated by the Site Manager will phone each of the local businesses included in Appendix 02, followed by the sewage service if appropriate to do so; and
- Finally the EA incident hotline will be dialled once the situation is under control.

16.3 Clearing and decontamination after a fire

After a fire event, the following procedure will be implemented depending on the severity of the fire:

1. A small and containable fire that can be safely dealt with in-house using suitably trained staff and firefighting equipment located on site: The fire will be recorded in the site diary, including the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this FPP and the site's EMS as required.

2. A larger fire that requires the presence of the Fire Service: If the site operatives have been told to evacuate or cease operations by the EA and/or Fire Service, the site will wait until told safe to re-enter site and resume operations. Any closure of the site will be followed by informing customers and the regulatory authorities. The fire will be recorded in the Daily Site Log and in an online incident report and will detail the causes of the fire and methods used to manage the fire. An assessment will be carried out to determine whether further mitigation measures could have prevented the fire. Any outcomes to be implemented onsite will be incorporated within this FPP and the site's EMS as required.

Should damage be sufficient to prevent the site from being able to store waste, the site will cease accepting waste and will divert to another AO facility.

The Site Manager will liaise with the EA to determine a plan-of-action to introduce normal operations at the site, and the timescales involved to achieve this.

A visual assessment will be carried out by the Site Manager to determine whether any fire damaged waste can be treated at AO's treatment plant. Wherever possible, unburnt wastes will be separated from fire damaged piles. If waste piles have become mixed, then it is likely that the waste will be removed from site to a suitably permitted facility.

The Site Management will determine what decontamination measures will be required to be carried out proportionately to the impact caused by the fire. The period of time taken to restore the site or affected part of the site to operational status will be determined by the nature and extent of the fire. If the affected area does not impact the rest of the site's operation, operations will re-start as and when appropriate.

16.4 Making the site operational after a fire

After a significant incident, an assessment will be undertaken by a suitably qualified individual. Technically competent managers and/or engineers will assess the degree of damage caused by a fire and the residual risk from fire damaged waste, emissions or equipment. Burnt waste material will be kept on site for a short period of time if required for a subsequent internal investigation. Following this, any material which cannot be treated at AO's fridge treatment facility will be transferred off site to a suitably permitted disposal facility.

17.0 Conclusion

This FPP is considered to be a 'working' document that is reviewed and updated annually or as required should any of the following occur:

- A fire on site;
- A change or review of legislation;
- A change to operations on site; or
- If the site is instructed to do so by the EA.

It is the responsibility of the Site Manager or nominated person to maintain this FPP and to ensure it is adhered to in the event of a fire on site.

APPENDIX BAT-OT1

Waste Acceptance Procedure

OPERATING PROCEDURE NO. 1

Transport and Acceptance of Hazardous Wastes

1. Purpose and Scope

This procedure ensures that only licensed waste carriers transfer and deposit waste with ao recycling and that disposals of Hazardous waste are correctly documented as required by the '*Environmental Protection Act 1990: Part II "The Duty of Care",'* and '*Waste Management: The Duty of Care: A Code of Practice (1996)*.'

2. Responsibility

The Transport and Administration Manager is responsible for selecting waste carriers and checking that they have a valid carrier's licence.

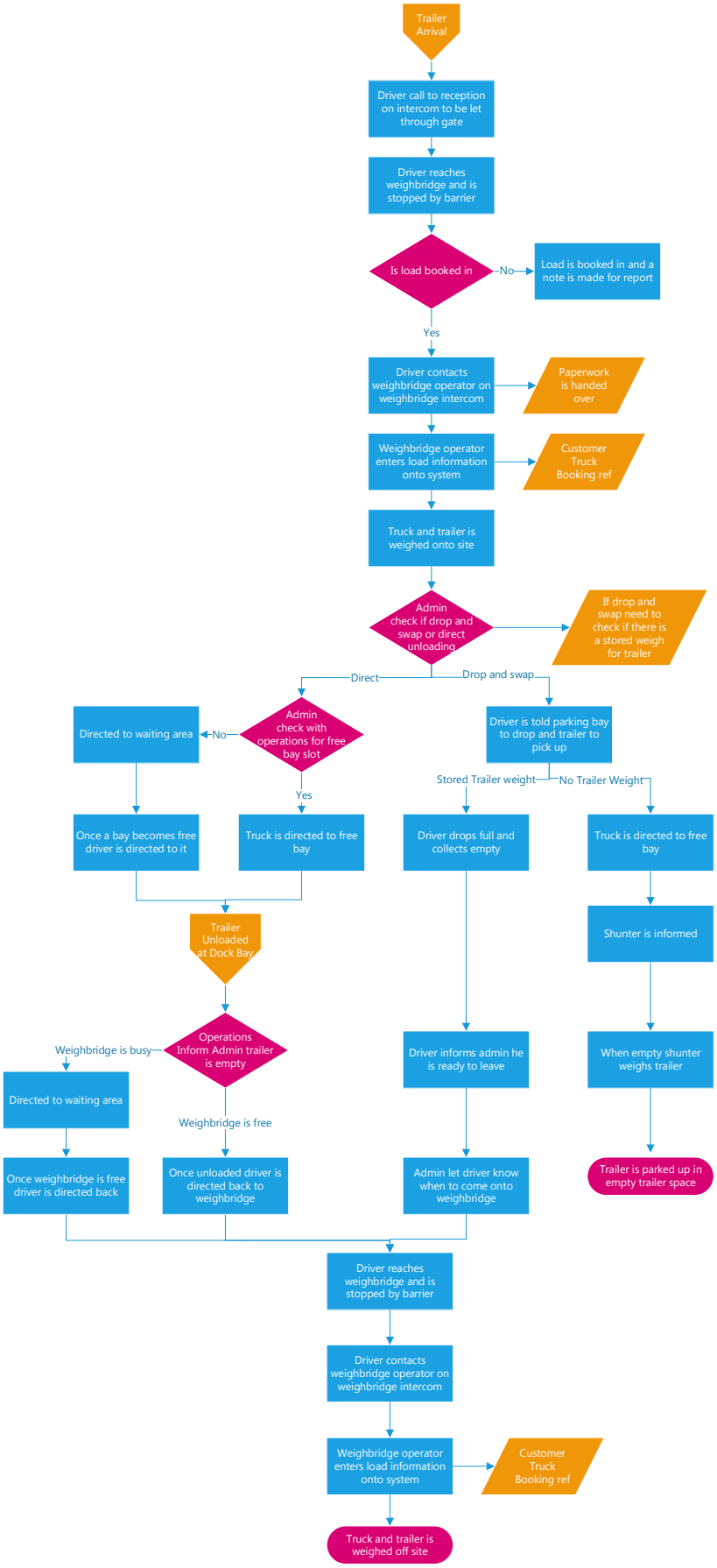
The Transport and Administration Manager is responsible for signing and receiving Consignment Notes when waste is removed or received.

The Transport and Administration Manager is responsible for completing Transfer Notes.

3. Waste Booking, Reception, Inspection and Validation Procedure

These are the steps we must go through for all waste loads delivered to site:-

- All loads Received on site are pre-advised.


Trailer Arrival
Driver call to reception on intercom to be let through gate
Driver reaches weighbridge and is stopped by barrier
Is load booked in
No
Load is booked in and a note is made for report
Yes
Driver contacts weighbridge operator on weighbridge intercom
Paperwork is handed over
Weighbridge operator enters load information onto system
Customer Truck Booking ref
Truck and trailer is weighed onto site
Admin check if drop and swap or direct unloading
If drop and swap need to check if there is a stored weigh for trailer
Direct
Drop and swap
Directed to waiting area
No
Admin check with operations for free bay slot
Driver is told parking bay to drop and trailer to pick up
Yes
Stored Trailer weight
No Trailer Weight
Once a bay becomes free driver is directed to it
Truck is directed to free bay
Driver drops full and collects empty
Truck is directed to free bay
Trailer Unloaded at Dock Bay
Shunter is informed
Operations Inform Admin trailer is empty
Weighbridge is busy
Driver informs admin he is ready to leave
When empty shunter weighs trailer
Directed to waiting area
Weighbridge is free
Once weighbridge is free driver is directed back
Once unloaded driver is directed back to weighbridge
Admin let driver know when to come onto weighbridge
Trailer is parked up in empty trailer space
Driver reaches weighbridge and is stopped by barrier
Driver contacts weighbridge operator on weighbridge intercom
Weighbridge operator enters load information onto system
Customer Truck Booking ref
Truck and trailer is weighed off site

- During the unload process, the unload operatives must decide if any special handling would be required for a particular load – it may be smouldering, leaking, fly infested, or dusty, etc. If this is the case, appropriate PPE and control procedures (gloves, masks, boots, availability of water, fire extinguishers, absorbent granules, etc.) must be agreed with the fork lift truck driver

- When waste is being unloaded, the lorry driver and/or fork lift truck driver must remain vigilant to make sure there is nothing hidden in it that is not allowed onto site

- Where possible waste that is received that is not allowed under the license is refused entry. However where exceptions arrive unknowingly (i.e. inside fridges etc), these must be reported to the Transport and Administration Manager, who must record the details, and then the items are pulled out and put into isolated '*quarantine*' storage for removal from the site later to the originator or an authorised disposal company (within 7 days). Any quarantined waste must be detailed.

- Any leaks or spills that occur during unloading must be mopped up with sawdust, clean soil, sand or proprietary granules – or contained – and removed from site for authorised disposal elsewhere these must be reported as a near miss.

4. Checking waste carrier licences

4.1 Checking

Before Receiving a delivery or entering into a contract with a waste carrier, the carrier shall be asked to provide a copy of his Waste Carrier Licence.
A check with the issuing office of the Environment Agency will be performed to ensure that the licence is still valid. This can be done by telephone or online.

The local office of the Environment Agency is at: (Hafren House,
Welshpool Road,
Shrewsbury
SY3 8BB)

Telephone: (0370 850 6506)

Website: www.environment-agency.gov.uk

For other areas, use the Agency's general enquiry line 03702 422 549 to ask for the relevant telephone number.

Any check on the licence must be recorded on the copy kept on file.

4.2 Exceptions

The local Council is not required to hold a waste carrier's licence for its own waste carrying activities.

Charities can be exempt from the requirement to hold a licence. Check that they have officially obtained an exemption.

4.3 Filing
Licences shall be filed by the Transport and Administration Manager.

4.4 Annual check
There shall be an annual check with the Environment Agency that licences are still valid. The outcome of the check shall be recorded on the copy licence.

4.5 Expiry of licences
New copy licences shall be obtained before a licence expires.

5 Hazardous Waste Transfer Notes (Transfer Notes)
All transfers of waste shall be documented on a Controlled Waste Transfer Note. Any member of staff responsible for handing over waste to a Waste Carrier must sign a Transfer Note, unless an annual Transfer Note (see paragraph 4.3) is in effect.

The Transfer Note is normally provided by the Waste Carrier. If no Transfer Note is available or ao recycling is using its own waste carrier then it will use its own form.

5.1 Annual (or period) Transfer Notes
The Transport Manager shall decide whether to document all regular transfers for up to a 12-month period on an annual Transfer Note.
All transfers using an annual Transfer Note must:

- Be the same category of waste
- From the same Waste Carrier
- Transferred at the same location

5.2 Transfer Note information
Transfer Notes shall contain the following information:

- Description of the waste
- How it is contained
- Quantity – which can be in units such as skips, sacks, drums
- Name and address of ao recycling
- Name and address of the waste carrier
- The waste carrier's registration number
- The address where the transfer took place
- Date of the transfer (or start and finish date for multiple transfers)
- Signed by the organisation's representative
- Signed by the representative of the waste carrier, e.g. the driver

5. Records

Completed Transfer Notes shall be filed, and retained for five years from the date of expiry.

APPENDIX FFP01

Emergency Contact List

Appendix FFP01 – Emergency Contact List

Emergency Contact List

Fire Service (in the event of a major fire)

- 999 or 112

Environment Agency Hotline (24-hour service)

- 0800 80 70 60

Local Businesses (with associated directions)

- Ambroplastics Limited (north): 01952 684922;
- Retail Furniture Limited (East): 01952 587277;
- Torque Tyres (South): 01952 684168; and
- Telford Fabrications (West): 01952 581372.

Sewage Service – Severn Trent Water Emergency Number (24-hour service)

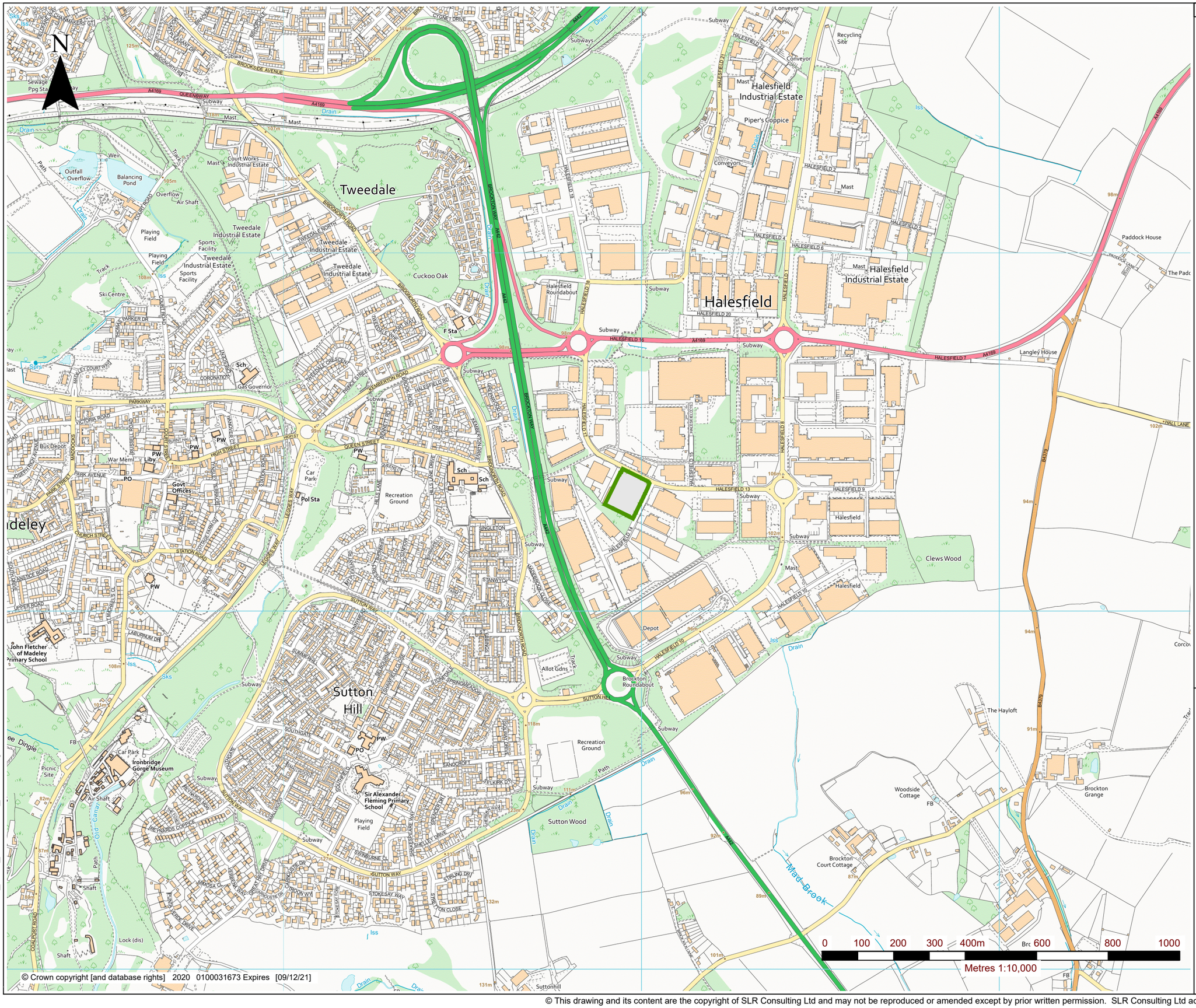
- 0800 783 4444

Halesfield Hazardous Waste Storage Installation

- 01952 583666

DRAWING 001

Site Location Plan



NOTES

ENVIRONMENTAL PERMIT BOUNDARY

AO RECYCLING LTD

SLR

3RD FLOOR
THE BREW HOUSE
JACOB STREET
BRISTOL, BS2 0EQ

T: 01179 064280
www.slrconsulting.com

HALESFIELD INDUSTRIAL ESTATE

ENVIRONMENTAL PERMIT APPLICATION

SITE LOCATION

DRAWING 01

Scale 1:10,000 @ A3

Date DECEMBER 2020

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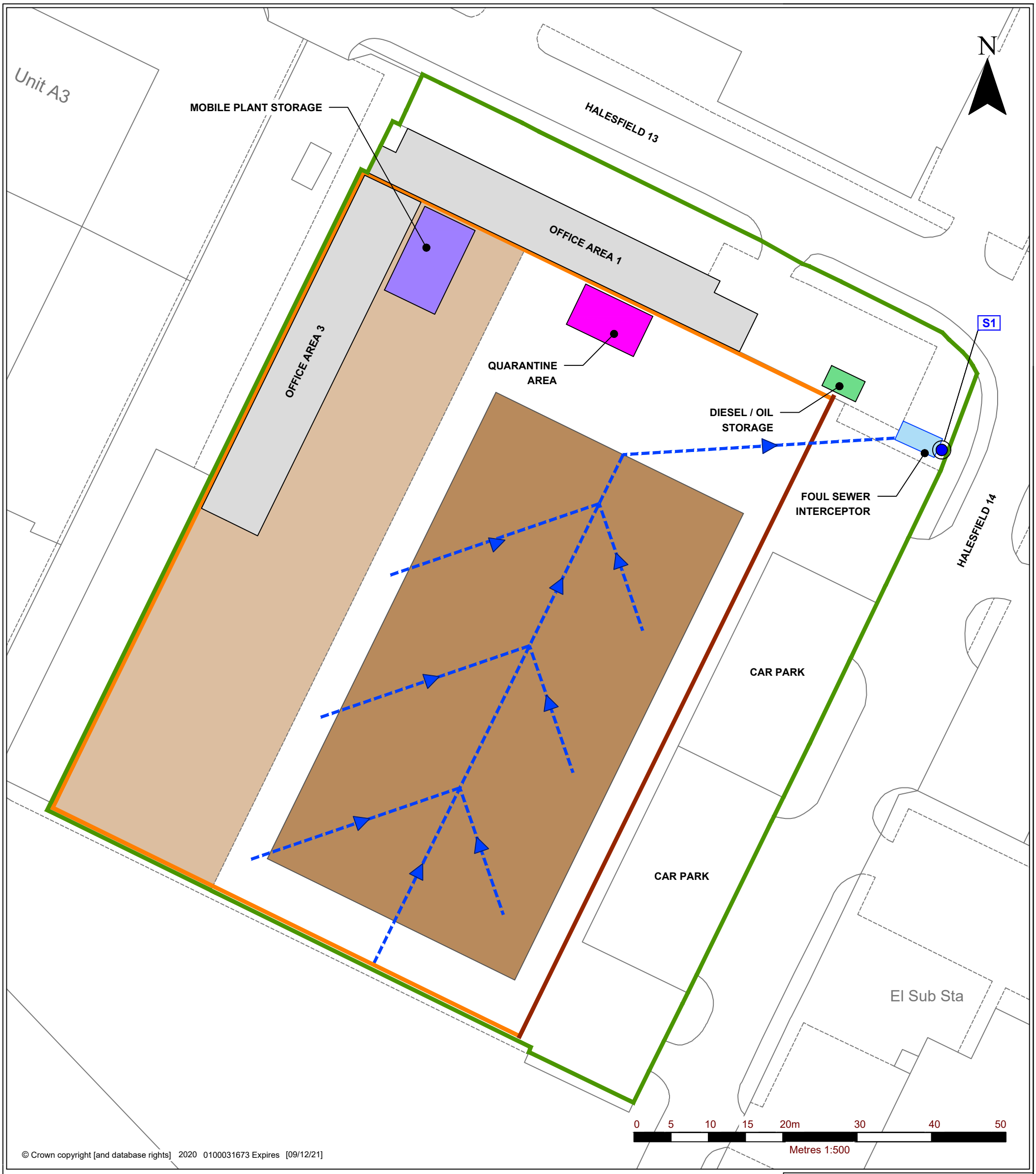
DRAWING 002

Site Layout and Drainage



ENVIRONMENTAL PERMIT BOUNDARY

BUILDING CANOPY

WALL

KERBING

WASTE STORAGE AREA

DRAINAGE

S1 DISCHARGE POINT TO FOUL SEWER

AO RECYCLING LTD

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BRISTOL, BS2 0EQ

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HALESFIELD INDUSTRIAL ESTATE

ENVIRONMENTAL PERMIT APPLICATION

SITE LAYOUT AND DRAINAGE

DRAWING 02

Scale	Date
1:500 @ A3	DECEMBER 2020

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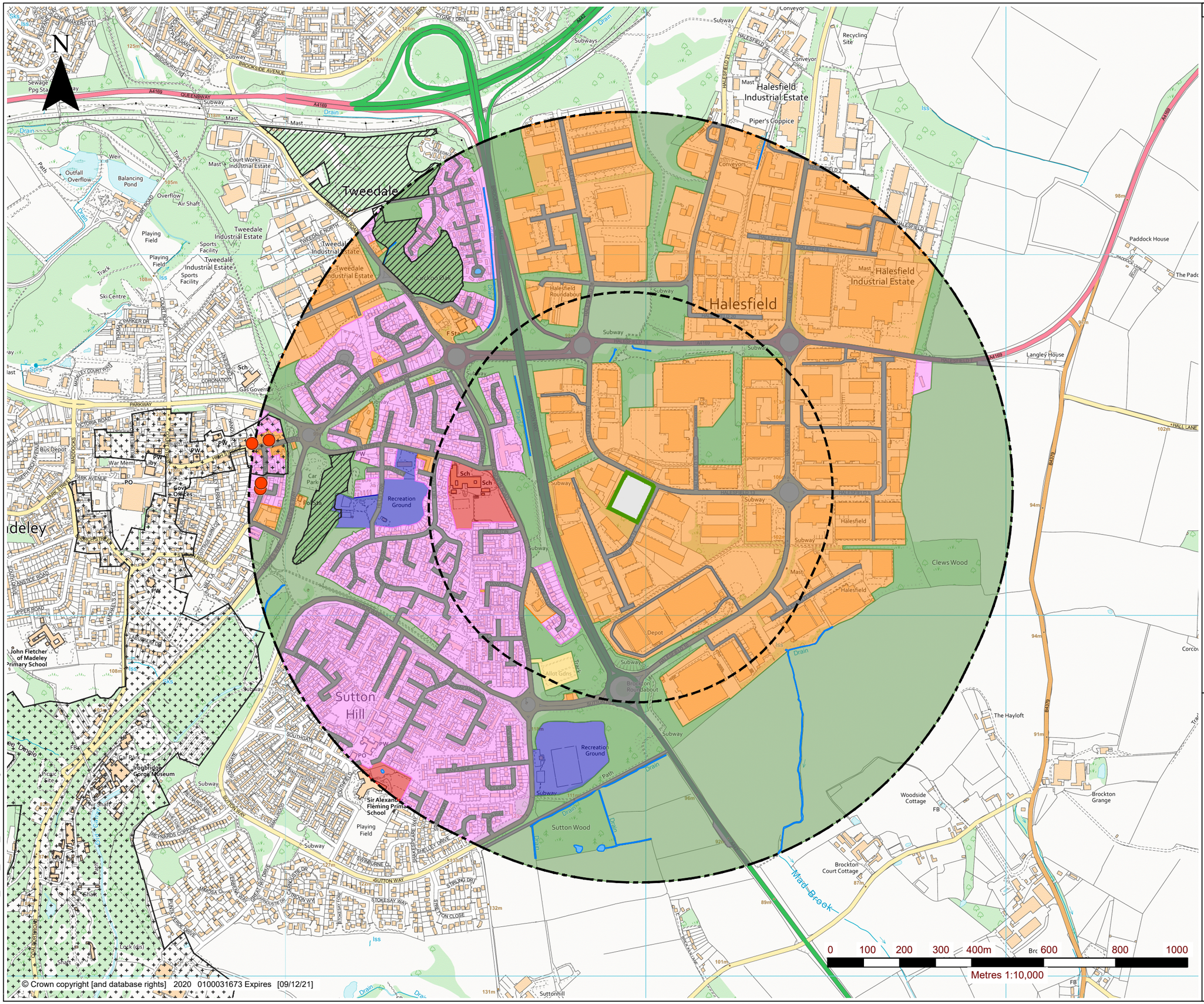
DRAWING 003

Environmental Site Setting



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09242.00010.13.003.0_ENV_SITE_SETTING.dwg

NOTES

- ENVIRONMENTAL PERMIT BOUNDARY
- 500m BOUNDARY OFFSET
- 1km BOUNDARY OFFSET
- LOCAL ROAD NETWORK
- RESIDENTIAL
- COMMERCIAL / INDUSTRIAL
- OPEN WATER / DITCHES
- EDUCATIONAL
- OPEN GROUND
- ALLOTMENTS
- RECREATIONAL
- LISTED BUILDING
- LOCAL NATURE RESERVE (LNR)
- WORLD HERITAGE SITE

AO RECYCLING LTD

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HALESFIELD INDUSTRIAL ESTATE

ENVIRONMENTAL PERMIT APPLICATION

ENVIRONMENTAL SITE SETTING

DRAWING 03

Scale 1:10,000 @ A3

Date DECEMBER 2020

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