Fire Prevention Plan for Otterpool Waste Transfer Facility March 2024

(Version 2)

Fire Prevention Plan for Otterpool Waste Transfer Facility

1.0 Introduction

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare a Fire Prevention Plan (FPP) in support of the bespoke Environmental Permit (EP) application for the proposed Otterpool Waste Transfer Station (WTS), located in Ashford, Kent, under the Environmental Permitting (England and Wales) Regulations (as amended) 2016.

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

The information contained in this FPP aims to meet the 3 main objectives of the EA's 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.

Under current fire safety legislation[2], a responsible person must carry out, or appoint a competent person to carry out, a suitable and sufficient fire risk assessment of the risks of fire to employees and others who may be affected by the site. A Fire Risk Assessment will be conducted before operations commence on site, and will be kept on site available for review at any time.

The site is not yet built, and therefore once the final detailed design of the WTS is finalised and agreed upon, the FPP will be fully updated to reflect.

2.0 Types of Combustible Material

2.1 Combustible Waste

It is proposed that the site will accept up to 95,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 12,000 tpa) including nappies and sharps.

A maximum of 1,500 tonnes of waste will be stored on site at any one time, and the site will be capable of accepting up to 300 tonnes of waste per day.

The proposed site layout is illustrated on Drawing 02.

It is proposed that the following waste types will be accepted on site, which are defined as 'combustible materials' in the EA's FPP Guidance:

- Green waste;
- Paper and cardboard;
- Mixed (comingled) waste;
- Bulky waste;
- Residual waste;
- Clinical Waste;
- Textiles;
- Plastic;

[1] Fire prevention plans: environmental permits - GOV.UK (www.gov.uk), Updated January 2021
[2] Regulatory Reform (Fire Safety) Order 2005

- Metal;
- Tyres.

The full proposed waste list is included in the Operating Techniques (OT) document, which is included as part of this EP application.

2.2 Persistent Organic Pollutants (POPs)

Waste containing POPs will be identified as part of CRL's Waste Acceptance Procedures (WAP) and will be segregated from non-POPs waste and stored separately, under cover within the designated 'Bulky POPs' storage area within the WTS building. The storage area is illustrated on Drawing 02. POPs waste will not be treated on site.

In the event of a fire on site, CRL would make the Fire and Rescue Service (FRS) aware that wastes containing POPs are present on site, and where they are stored. If there is a fire involving POPs waste, then any residue will be segregated and treated following POPs regulations, including any firewater.

2.3 Other Combustible Materials

The site will store 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 proposed storage arrangements are shown in Table 2-1 below and on Drawing 02.

Table 0-1
Non-Waste Materials: Storage Arrangements

Type	Storage Location	Storage Arrangement
Diesel Tank	Designated storage area near car park/offices in northern area of the site.	30,000 litre tank 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 will be kept in the site office, located in the northern area of the site as illustrated on Drawing 02, and a copy will be held on CRL's Public Drive on its business management software system accessible by all staff. In addition, hard copies will also be issued:

- To all managers and supervisors at the site;
- To CRL's Compliance Team;
- To Kent Fire and Rescue Service;
- On the Health & Safety notice boards in all Welfare Units;
- As part of the induction pack for all staff employed to operate the facility, and for all third party contractors working at the site.

All staff will be made aware of the contents of the FPP and 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. This will ensure that all staff and contractors working on site know what they must do:

- To prevent a fire happening; and

- During a fire if one breaks out.

3.2 Testing the Plan and Staff Training

3.2.1 Staff Training and Procedures

All staff will receive training on the identification of signs of a fire or potential signs, the use and selection of fire extinguishers, fire evacuation, fire safety, the use of the IR gun, and all relevant emergency procedures, in addition to training according to their individual duties. A training package will be provided to all new site operatives by suitably qualified persons and overseen by externally appointed, Fire Safety and Training advisors. The training will be refreshed regularly, and more frequently in the event of fire, any changes to the FPP, or in the event of non-compliance to ensure the site operatives have up to date knowledge of procedures.

All staff and contractors working on site 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.

Certain staff members on site will receive enhanced training to become designated Fire Marshals. There will always be at least one Fire Marshal present on site, during operational hours.

The procedures for fires discovered on site will be provided on-site notice boards.

CRL will review 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. Exercises include what staff need to do to prevent a fire occurring and what to do during a fire if one breaks out.

3.2.2 Testing the FPP

This FPP will be implemented across the site and all fire management equipment will be tested on an annual basis and maintained in line with schedules set by CRL's maintenance procedure, and the manufacturer's specifications.

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

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

Regular checks will be made of all escape routes and equipment.

The FPP will be kept under regular review and revised where necessary, for example if:

- There is a reason to suspect it no longer meets the FPP objectives;
- The site has a fire or identifies a near miss of a fire;
- On site activities/operations are changed;
- The environment surrounding the site changes; or
- The EA ask CRL to revise the FPP due to concern over the risk posed by on site operations.

4.0 FPP Contents

4.1 Activities at the Site

The proposed Otterpool WTS will accept up to 95,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 12,000 tpa) including nappies and sharps.

Non-hazardous waste will be accepted on site for storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. The proposed site will consist of a WTS building, housing designated concrete bays and containers for the storage of waste including co-mingled recyclable materials, bulky waste, paper and cardboard, residual waste, street sweepings, garden waste, clinical waste and food waste as illustrated on Drawing 02.

Waste treatment on site will only consist of manual sorting, and separation, storage, bulking up, and transfer off site for further recovery/disposal.

It is proposed that the site will accept a small amount of clinical waste consisting of nappies and sharps (approximately 12,000 tpa). Clinical waste will be stored within designated bays/containers inside the WTS building, as illustrated on Drawing 02. The WTS building will benefit from impermeable surfacing and a sealed drainage system throughout.

There will be no treatment of clinical waste on site, only storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Clinical waste will be stored for a maximum of 5 days.

4.1.1 Specified Waste Management Activities

The activities that will be carried out at the proposed site as defined under Annex II of the Waste Directive Framework can be summarised as follows:

- **R3:** Recycling or reclamation of organic substances which are not used as solvents;
- **R4:** Recycling or reclamation of metals and metal compounds;
- **R5:** Recycling or reclamation of other inorganic materials;
- **R13:** Storage pending recovery or disposal.

4.2 Site Plan

The site is located on Ashford Road, Kent, TN25 6DA centred on National Grid Reference (NGR) TR 11237 36597. The town of Ashford is located approximately 11km north west of the site. The site will be accessed via the A20 Ashford Road which runs adjacent to the site's northern EP boundary.

The site's location is illustrated on Drawing 01, and the EP Boundary and Sie Layout are illustrated on Drawing 02. Local receptors within a 1km radius of the site are shown on Drawing 03, and Cultural and Natural Heritage Receptors on Drawing 04.

4.3 Plan of Sensitive Receptors Near the Site

The area surrounding the site comprises predominantly agricultural / open land. The English Channel is situated approximately 4.6km south / south-east, and the East Stour River flows in a west-east direction approximately 320m north of the site at its closest point.

The closest residential receptors are individual properties situated approximately 160m north west, 120m west, 220m south, and 240m east.

A summary of the site's immediate surrounding land uses is identified in Table 4-1 below.

Table 4-1: Surrounding Land Uses

Boundary	Description
North	Adjacent to the north is the A20 Ashford Road. Immediately beyond this is a commercial/industrial premises, followed by open ground, and the East Stour River.
East	Immediately to the east lies Otterpool Quarry Site of Special Scientific Interest (SSSI), followed by an individual residential property called Mink Farm. The land beyond this predominantly comprises open/agricultural land.
South	Otterpool Quarry SSSI lies immediately south of the site, followed by Upper Otterpool residential property. Open/agricultural land also lies in this direction.
West	The B2067 lies approximately 130m to the west. Land around this largely comprises open / agricultural land, in addition to Otterpool Manor, and Barrow Hill Farm Cottages residential properties, and a small commercial/industrial area.

The surrounding land use within a 1km radius of the site is described in detail further below.

4.3.1 Agricultural / Open Land

The area surrounding the site comprises predominantly agricultural / open land. The site is bounded to the eastern, southern and western EP boundaries by agricultural / open land.

4.3.2 Commercial and Industrial

Within 1km of the site, there are a few individual commercial / industrial premises, as follows:

- Approximately 20m north of the site, across Ashford Road, lies a commercial premises belonging to SEVA Rail Service Limtied and 'The Airport Cafe';
- Approximately 180m west of the site is Invvu Construction Consultants, and stables;
- Wraight's Mowers is situated approximately 500m east;
- A small commercial / industrial area including Alcaline 2nd Yard, RML Seafrigo UK Inland Border Hub Kent, and Laser Transport lie approximately 600m south; and
- Price R & Sons Farm is located approximately 520m north west.

4.3.3 Residential

There are a limited number of residential properties within 1km of the proposed site. The closest residential receptors are individual properties situated approximately 160m north west, 120m west, 220m south, and 240m east.

Residential properties located on the outskirts of Sellindge village are situated approximately 420m north west of the site, and further residential properties lie approximately 900m to the south.

4.3.4 Local Transport Network

Ashford Road (A20) runs in an east-west direction adjacent to the site's northern EP boundary. In addition to this, Otterpool Lane (B2067) lies approximately 130m west of the site, and an unnamed track is approximately 100m east of the site.

The railway line runs in an east-west direction approximately 900m to the north of the site.

4.3.5 Surface Water Features

There are a number of surface water features within 1km of the site, comprising largely of small drains and springs. The closest of these is a small spring which lies approximately 70m east of the site at the closest point.

In addition, the East Stour Rivers flows in a west-east direction approximately 320m north.

4.3.6 Geology

A review of the British Geological Survey (BGS) map[3], reveals that the site is underlain by a bedrock of Hythe Formation (sandstone and limestone, interbedded). This is a sedimentary bedrock formed between 126.3 and 113 million years ago during the Cretaceous period.
There are no superficial geological deposits underlying the site.

4.3.7 Hydrogeology

Aquifer Designations

The bedrock deposits underlying the site are designated as a Principal aquifer according to the Multi-Agency Geographical Information for the Countryside (MAGIC) map[4].
There are no superficial aquifer classifications underlying the site.

Source Protection Zones

There are no Source Protection Zones classified beneath the site.

4.3.8 Hydrology

Groundwater Vulnerability

The Groundwater Vulnerability layer on MAGIC map reveals that the site lies within an area classified as 'high vulnerability'.

Flood Zone

The Flood Map for Planning[5] confirms that the Site lies within Flood Zone 1, which is defined as "*land having a less than 1 in 1,000 annual probability of river or sea flooding*".

4.3.9 Ecology

Sites of Special Scientific Interest (SSSI)

There are three SSSIs which lie within a 2km radius of the site. The SSSI's are described as follows;

- Otterpool Quarry SSSI lies adjacent to the site's eastern and southern boundaries. The quarry is designated for the Cretaceous Hythe Beds;
- Gibbin's Brook SSSI is located approximately 1,500m north of the site and is designated for areas of marshy grassland found there; and
- Lympne Escarpment SSSI is situated approximately 1,700m south of the site and is designated for the Kentish ragstone, grassland, and woodland found there.

Other Receptors

A review of MAGIC map identifies that none of the following receptors are located within 2km of the site:

- Ramsar;
- Special Areas of Conservation;
- Special Protection Area; and
- Marine Conservation Zone.

[3] British Geological Society, geology viewer map https://geologyviewer.bgs.ac.uk/ accessed in March 2024
[4] Multi-Agency Geographical Information for the Countryside Map, available at www.magic.gov.uk, accessed in March 2024
[5] Gov.uk, Flood Map for Planning, available at https://flood-map-for-planning.service.gov.uk/, accessed in March 2024

Nationally / Locally Designated Sites

The following national designated sites were identified within 2km of the site;

Ancient Woodland;

There are four areas of ancient woodland within 2km of the site. The closest of these is Harringe Brooks Wood which lies 750m south-west of the site.

Area of Outstanding Natural Beauty (AONB); and

Kent Downs AONB is located to the east and south of the site, approximately 1,500m east of the site at the closest point.

Other Receptors

A review of MAGIC map identifies that none of the following receptors are located within 2km of the site:

- Local Nature Reserve; and
- National Nature Reserve.

4.3.10 Cultural Heritage

A review of MAGIC confirmed that the following receptors are present within a 2km radius of the site:

Listed Buildings

There are a number of listed buildings within 2km of the proposed site. The closest of each listed building grade are as follows:

- Grade II listed Otterpool Manor, is located 150m to the west;
- Grade I listed Barns at Westenhanger Manor, is located 1,050m to the north-east; and
- Grade II* listed French House, located 1,760m south.

Scheduled Monuments

There are five schedule monuments located within 2km of the proposed site boundary. The closet of these is 'Round barrow approximately 400m north-east of Upper Otterpool Farmhouse, also known as barrow 136', located 330m to the east.

Registered Park or Garden

There are two registered parks and gardens within 2km of the site;

- Sandling Park, located 1,355m to the south-west; and
- Port Lympne, located 1,520m to the east.

Other Receptors

A review of MAGIC map identifies that none of the following receptors are located within 2km of the site:

- World Heritage Sites;
- Registered Battlefields.

4.4 Receptors

Table 4-2 and Drawings 03, and 04 identify the receptors which are considered to be potentially sensitive and could reasonably be affected by activities at the site.

Table 4-2 Receptors

Receptor Name	Receptor Type	Direction	Approximate Distance from Permit Boundary (m)
Local Receptors within 1km of the proposed EP boundary, as shown on Drawing 03 and ecological, cultural and natural heritage receptors located within 2km of the proposed EP boundary as shown on Drawing 04.			
Principal Aquifer	Aquifer	N/A	N/A
Agricultural / Open Land	**Agricultural / Open Land**	**East, south, west**	**Adjacent**
Ashford Road (A20)	**Local Transport Network**	**North**	**Adjacent**
Otterpool Quarry	**SSSI**	**East, West**	**Adjacent**
The Airport Cafe	**Commercial / Industrial**	**North**	**20**
Spring	**Surface Water Features**	**East**	**70**
Unnamed Track	**Local Transport Network**	**East**	**100**
Otterpool Manor	Residential Property	West	120
Otterpool Lane (B2067)	Local Transport Network	West	130
Otterpool Manor	Grade II Listed Building	West	150
Barrow Hill Farm Cottages	Residential Property	North west	160
Invvu Construction Consultants	Commercial / Industrial	West	180
Upper Otterpool Farm	Residential Property	South	220
Mink Farm	**Residential Property**	**East**	**240**
East Stour River	**Surface Water Features**	**North**	**320**
Round Barrow	**Scheduled Monument**	**East**	**340**
Sellindge Village	Residential Properties	North west	420
Bell Barrow	**Scheduled Monument**	**North**	**490**
Wraight's Mowers	**Commercial / Industrial**	**East**	**500**
Price R and Sons Farm	Commercial / Industrial	North west	520

Receptor Name	Receptor Type	Direction	Approximate Distance from Permit Boundary (m)
Remains of the Causeway of the south Westenhanger Castle	**Scheduled Monument**	**East**	**590**
Commercial/industrial area including: Alkaline 2nd Yard, RML Seafrigo UK Inland Border Hub Kent, Laser Transport etc	Commercial / Industrial	South	600
Harringe Brooks Wood	Ancient Woodland	South west	750
Residential Properties	Residential Properties	South	900
Railway	**Local Transport Network**	**North**	**900**
Westenhanger Castle	Scheduled Monument	North west	960
Barns at Westenhanger Manor	Grade I Listed Building	North east	1050
Sandling Park	Registered Park and Garden	South west	1355
Gibbin's Brook	**SSSI**	**North**	**1500**
Kent Downs	**AONB**	**East, south**	**1500**
Port Lympne	**Registered Park and Garden**	**East**	**1520**
Aldergate / Hillhurst Wood	Ancient Woodland	South west	1670
Lympne Escarpment	SSSI	South	1700
Folks Wood	**Ancient Woodland**	**East**	**1700**
French House	Grade II* Listed Building	South	1760
Kiln Wood	**Ancient Woodland**	**East**	**1800**

4.5 Windrose

Figure 4-1 shows the average wind patterns from 2016 to 2018 as identified by the Lydd Meteorological station. The most prominent wind direction is from the south west, south, and west, to the north east. Winds from the north, and east are relatively infrequent. Receptors highlighted in bold in Table 4-2 above are likely to be affected in the event of a fire as they are located in the path of the prevailing wind (from the south west).

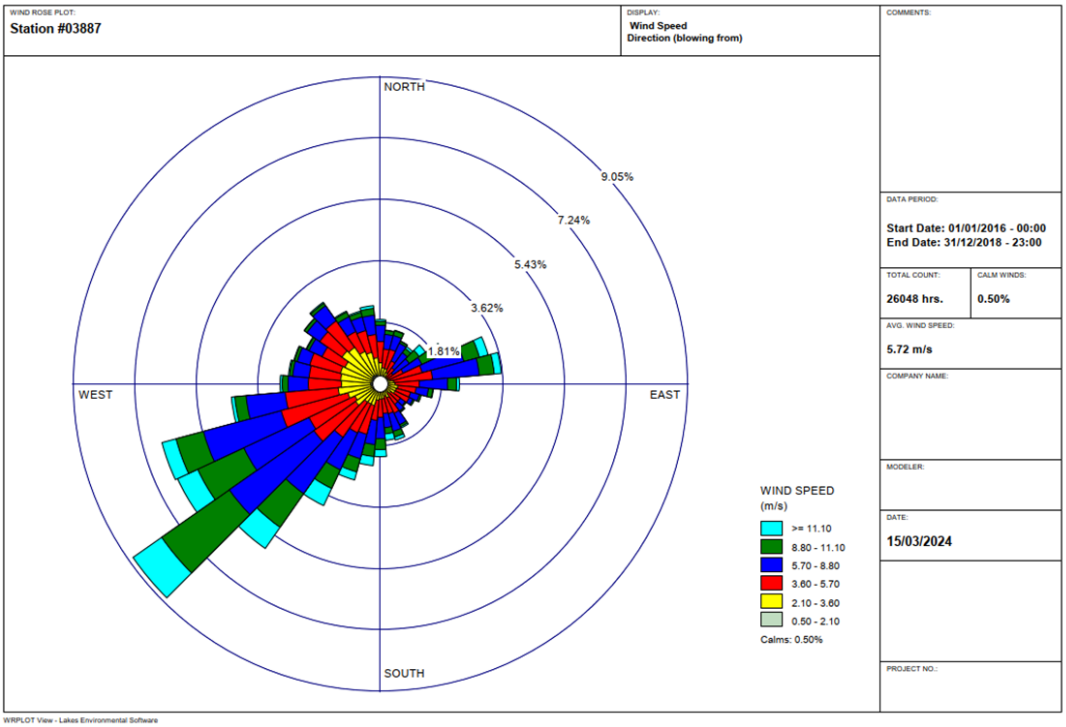


Figure 4-1 Lydd Meteorological Station (2016 – 2018)

5.0 Manage Common Causes of Fire

5.1 Arson

The site will benefit from the following security measures in place to limit the likelihood of arson or vandalism:

- The site will be manned during operational hours by site staff who will undertake regular inspections of the site;
- An internal and external CCTV monitoring system which can be monitored remotely; and
- A 2.4m high steel palisade security fence.

All visitors to the site (other than those delivering waste) will be required to report to the site office on arrival and to sign the visitor's book.

The site will be visually inspected by site operatives at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosures will be made secure by temporary repair by the end of the working day. Permanent repairs will be affected as soon as practicable. All inspections, any defects, damage or repairs will be recorded in the Site Diary.

The site's proposed operational hours are from 6am to 6pm Monday to Sunday (excluding Christmas Day or New Years Day). The site will be manned by site operatives during operational hours.

CCTV will cover operational areas, and is monitored regularly by site operatives during operational hours. Outside of operational hours, the CCTV can be monitored remotely. If a breach in security is detected site operatives/the out of hours the remote monitor would contact the Site Manager and emergency services as appropriate, both inside and outside of operational hours.

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 site diary. Records maintained will include inspections and maintenance of doors and locks, breaches of security, investigations and actions taken. Should additional security measures appear necessary these will be discussed in advance with the EA.

5.2 Plant and Equipment

Plant and equipment will be maintained in accordance with the manufacturer's recommendations and CRL's maintenance procedure. CRL operates a policy of regular replacement of critical plant and machinery. All new plant on site will be fitted with telematics, which will automatically highlight any faults, and local suppression as part of the minimum design specifications. All mobile plant and machinery (single agent only to clamp trucks) will be fitted with fire extinguishers and dual agent fire suppression systems incorporating battery isolator and machine engine shut down functions.

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

Induction training and refresher training will be provided to staff in the safe operation of plant and equipment relevant to their role, in accordance with the Operating Techniques (OT) document.

Inspection of plant and equipment will be undertaken on a daily basis, at each shift change to check for faults and ensure appropriate safeguards are in place and recorded in the Site Diary. The procedure also covers general housekeeping and cleaning of plant and all equipment on site. In addition, plant and equipment will be visually inspected prior to every use to ensure it is fit for purpose.

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.

Any mobile plant not in use or requiring maintenance is temporarily stored in the designated area of the site, by the weighbridge as illustrated on Drawing 02.

5.2.1 Mobile Plant

The full list of mobile plant to be held on site will be confirmed once the site is fully operational.
The mobile plant storage area is located by the weighbridge as illustrated on Drawing 02.

5.2.2 Fixed Equipment

There will be no fixed plant permanently on site.
In summary, the following provisions will be 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 will be fitted with portable fire extinguishers; and
- Mobile plant will be kept away from combustible waste. This will be achieved by allocating areas for mobile plant storage when not in use as illustrated on Drawing 02.

5.3 Electrical Faults

5.3.1 Electrics Certification

All electrics on site will be fully certified by a qualified electrician and a record of the certification will be kept. The following measures will be in place:

- BS7671 fixed electrical wiring testing will be taken every 1 – 3 years;
- Only fire rated LTFB10 and LTFB70 LED lighting will be used;
- Control panels to all plant and machinery in all buildings will be tested annually and cleaned down daily; and
- DESEAR risk assessment will be undertaken every 3 years and findings and actions will be updated accordingly.

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 regularly inspected prior to every use to ensure it is free from obvious damage and that it is fit for purpose. Regular safety checks and daily site inspections will be recorded in the Site Diary. All building electrics will be fully certified by a qualified electrician.

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

5.4 Discarded Smoking Materials

CRL has a no smoking policy which means there will be no smoking in the proposed site. The Site Manager will be responsible for ensuring that this is implemented on site.

5.5 Hot Works Safe Working Practices

It is unlikely that hot works will be required on site. However, should hot works be required CRL will operate a permit to work system in accordance with CRL's Health and Safety Safe Working Procedures and SHEQ procedures. The permit to work system will include a 30 minute fire watch by a competent person at the end of the works, with intermittent return inspections over the following 2 hours. No hot works will be undertaken by staff unless they are trained and have the relevant permit to work.

Any hot works will be carried out in a cleared area of the site at least 6m from any combustible waste. A site operative will perform a continuous fire watch during the hot work.

5.6 Industrial Heaters

All welfare buildings will be located at least 10m away from waste storage areas. No portable heaters will be utilised on site, and there will be no heating within the WTS building.

The Site Management will ensure that any heating in the welfare areas is switched off when the area is not in used.

5.7 Hot Exhausts and Engine Parts

Vehicles will be 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.

Vehicle operatives will conduct an inspection of each vehicle at least once a day and record any findings in the Site Diary. Operatives will check the cleanliness of the plant paying particular attention to any build up of dust or waste around the engine and exhaust.

5.7.1 Fire Watch Procedures

A 1 hour fire watch will be undertaken at the end of every shift where all mobile plant will be switched off and exhausts will be checked to ensure they are cool and that no dust has settled. Where possible, mobile and

static plant will be switched off at least 30 minutes before the last person leaves the site and the site manager ensures that an inspection of all waste storage areas is undertaken looking for any signs of fire.

5.8 Ignition Sources

Potential ignition sources will include hot exhausts and engine parts, 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 Batteries

The proposed site will be permitted to accept, segregate and store waste batteries. All vehicles bringing waste material to the site will report to the weighbridge or the site office, following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by site operators for storage. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation. Should waste batteries be identified within the waste stream during visual inspection, they will be removed and placed in a designated area. Batteries will be stored in appropriate covered weatherproof containers within the WTS building to prevent them from coming into contact with liquids or from being damaged.

5.9.1 Batteries in ELVs

The site will not accept ELVs therefore this section is not applicable.

5.10 Leaks and Spillages of Oils and Fuels

Plant and equipment will be maintained to a high standard in accordance with the manufacturer's recommendations. All mobile plant will be inspected at least daily to identify potential defects that could lead to a leakage of fuel across the site. Vehicle operatives will record any findings and actions in the Site Diary.

Inspection of any spillages or leaks from containment will be completed at least daily by site operatives. 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 protocol found within the following actions 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 flowing outside the EP boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.

All staff will be trained on spillages and the use of spill kits, which will be available throughout the site, in the event of a spillage or leak on site.

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

The risk of the build-up of combustible waste, dust and fluff is low due to the following measures implemented on site:

- The site will be operated in accordance with the Dust Management Plan (DEMP) (Ref: 402.065068.00001/DEMP);
- All waste will be stored within designated bays inside the WTS building;
- Speed limits will be implemented on site for all vehicles to minimise the mobilisation of particulates;

- All incoming waste will offloaded in close proximity to the storage areas 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 follows the inspection and maintenance schedule recommended by the manufacturer and CRL's maintenance procedure. This will include corrosion prevention where applicable;
- The site will benefit from good housekeeping and all areas will be cleaned on a daily basis. Waste storage areas will be inspected on a weekly basis by the Site Supervisor and cleaned as necessary;
- Site access roads and operational areas will be maintained and swept regularly to reduce dust generation; and
- Daily visual inspection of the site and site boundary will be carried out by site personnel.

5.12 Reactions Between Wastes

The site will not accept waste types which are potentially incompatible with each other. To ensure that incompatible materials are not received on site, the site will implement strict waste acceptance procedures to ensure the waste is as expected and that it can be accepted at the site.

All vehicles bringing waste material to the site will report to the weighbridge or site office following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by site operators for storage. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation. Any non-conforming waste that is received will be removed to the designated quarantine area, and the details will be recorded.

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

5.13 Waste Acceptance and Deposited Hot Loads

No burning, reactive/reacting or visible hot (producing steam or heat) loads will be accepted on site. In accordance with the site's waste acceptance procedures, all waste will undergo visual inspection during deposition within the WTS building, therefore minimising prohibited waste 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 extinguished immediately using a fire extinguisher. Any fire damaged waste will be removed from site the same day to a suitably licenced facility for disposal.

5.14 Hot and Dry Weather

During periods of extreme hot weather (defined as temperatures higher than 25°C on two consecutive days) the following actions will be carried out:

- Concentrated beams of sunlight or glare reflected onto stockpiles through surfaces will be minimised;
- Visual inspections of waste storage areas will be increased to four times per shift.

6.0 Prevent Self-Combustion

6.1 General Self-Combustion Measures

Self-combustion of waste on site is not considered to be a significant risk due to effective stock management, the short storage times (maximum 5 days) and because waste is segregated into dedicated storage areas. As such, the site will have waste acceptance and stock management procedures which will be upheld by all employees at the site.

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

- All waste deliveries will be checked upon deposit within the WTS building. Checks will include both the paperwork and the full contents of the load. If the waste is found not to conform it will be removed to the quarantine area;
- No loads will be removed from the site without an onsite operative in supervision;
- A visual fire watch will be performed as the loads are received and unloaded;
- A quarantine area will be kept available;
- Waste storage times will be minimised;
- Risk factors (e.g. mixing of materials) will be reduced by the segregation of waste within separate storage areas;
- Daily inspections of waste storage areas will be undertaken to ensure material is contained within the bay, the maximum height is not exceeded and that no prohibited items are present;
- Waste will be handled in accordance with a safe system of work. On site personnel will be instructed and trained on the safe system of work.

Only wastes included in the EP will be accepted at the site.

Non-waste materials that pose a risk of self-combustion are stored as indicated in Table 2-1.

6.2 Manage Storage Time

CRL implement stock management procedures to limit the likelihood of self-combustion of materials stored on site. Under normal operating conditions, waste is typically transported offsite within a maximum of 5 days.

The site will adopt and implement a first in, first out system.

6.2.1 Method Used to Record and Manage the Storage of all Waste on Site

All vehicles bringing waste material to the site will report to the weighbridge or site office following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by site operators for storage. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation.

The quantity of waste accepted and despatched from the facility will be measured via the weighbridge. A register of the quantities and characteristics of waste accepted on site will be maintained on a computerised database. The system will also operate as the waste inventory and stock control system. The system will include the following information as a minimum:

- The date the waste arrived on site;
- The original producer's details (or unique identifier);
- A unique reference number;
- Waste pre-acceptance and acceptance information;
- The package type and size;
- The intended treatment or disposal route;
- The nature and quantity of wastes held on site;
- Where the waste is physically located on site;
- Where the waste is in the designated recovery process;
- The staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options;

- Details that link waste to relevant transfer notes; and
- Details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

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

6.2.2 Stock Rotation Policy

Arrangements on site will ensure that a 'first in first out' approach is adopted so that the storage of waste does not exceed the prescribed duration. The Site Manager will be responsible for stock rotation on site and will ensure that waste with the earliest storage dates is removed from site first. This will be managed via the waste inventory system,

6.3 Monitor and Control Temperature

6.3.1 Reduce the Exposed Metal Content and Proportion of Fines

Strict waste acceptance checks will be carried out to ensure that only permitted waste is allowed to be accepted on site. Loads will visually inspected upon arrival, and during deposit within the WTS building. Any loads found to be contaminated will be moved to the quarantine area prior to removal from site.

The proportion of metal 'fines' within the waste is not considered to contribute to the risk of self-combustion. Segregated household and commercial waste is not known to have a high 'fines' content that would require management.

6.3.2 Monitoring Temperature

The site's proposed operational hours are between 6am and 6pm Monday to Sunday (excluding Christmas Day and New Years day) during which the site is continually manned. Site operatives will be trained to remain vigilant at all times and look out for signs of fire. Staff will be trained how to identify fires and fire hazards on site. Staff will also receive training on the use and selection of fire extinguishers, site evacuation, and shut down procedures, fire safety, and all relevant emergency procedures.

On a 2 hourly basis during operational hours, site operatives visually inspect the storage areas for any anomalies such as visual signs of heat, steam or vapour. Site operatives will use an IR gun to scan each stockpile, and monitor and record the temperature, as part of the inspections. Anomalies will be actioned immediately by investigation and remedial action will be taken such as rotation of the waste within the storage area or removal of heated waste, which will be put into the quarantine for assessment.

In addition, the WTS building will benefit from a Helios Fire System, automatic detection and suppression system, which will constantly monitor the waste storage areas for any anomalies.

6.3.3 Controlling Temperature

The following actions will be taken to control temperature, reduce the risk of hot spots, and to minimise the risk of self-combustion within waste storage areas:

- Waste storage times will be minimised by using a first-in-first-out principle and all waste is stored for a maximum of 5 days under normal operating conditions before removal from site;
- Bays will be sized according to the minimum required for operational efficiency;
- The waste tracking system will allow for real time management of waste storage times and will be used daily to assess the quantity of waste awaiting treatment and the amount due to be removed from site;

- Hotspots will be detected and controlled by 2 hourly visual inspections using an IR gun during operational hours, and the Helios automatic detection and suppression system;
- Waste will be regularly moved, and removed from the site within a maximum of 5 days under normal operating conditions. Therefore, due to the nature of operations on site, waste will be routinely turned releasing any heat generated within a pile.

6.3.4 Dealing with Hot Weather and Heating from Sunlight

Please see Section 5.14 above for the measures that will be taken during periods of extreme hot weather.

6.4 Waste Bale Storage

No waste bales will be held on site, therefore this section is not applicable.

7.0 Manage Waste Piles

All waste storage will take place on impermeable surfacing with a sealed drainage system within the WTS building. The waste storage areas are discussed further below, and illustrated on Drawing 02.

7.1 Storing Waste Materials in their Largest Form

The site will operate as a WTS for the acceptance, storage, and bulking up of waste prior to export to an alternative suitably permitted facility for further recovery/disposal.

There will be no waste treatment undertaken on site, apart from manual sorting, and separation, storage and bulking up prior to onward transfer.

Therefore, all waste will be stored in its largest form.

7.2 Maximum Pile Sizes for the Waste on Site

The proposed waste storage areas are described in Table 7-1 below, and illustrated on Drawing 02. Non-combustible material types are shaded grey in the table below and are included for completeness but are not subject to the FPP guidance requirements. A 1m freeboard will be maintained at the top and sides of the bay walls at all times to prevent fire spreading.

Table 0-1
Current Storage Areas: Waste Types and Dimensions

Waste Received	How it is stored	Maximum Storage Time	Length (m)	Width (m)	Height (m)	Maximum Volume (m^3)
Waste Transfer Station Building						
Comingled Waste	3 x Bays	5 days	12	10.5	3	378
Bulky Waste	1 x Bay	5 days	8.5	10.5	3	267.75
Paper and Cardboard	1 x Bay	5 days	8.5	10.5	3	267.75
Residual Waste	1 x Bay	5 days	10.5	11.5	3	362.25
Street Sweepings	1 x Bay	5 days	9.5	10.5	3	299.25
Garden Waste	1 x Bay	5 days	8.5	10.5	3	267.75

Waste Received	How it is stored	Maximum Storage Time	Length (m)	Width (m)	Height (m)	Maximum Volume (m^3)
Clinical Waste	1 x bay	5 days	8.5	10.5	3	267.75
Bulky POPs	1 x bay	3 days	8.5	10.5	3	267.75
Food Waste	1 x bay and trailer	3 days	8.5	10.5	3	267.75

8.0 Waste Stored in Containers

8.1 Types of Containers

The site will store waste in the following containers:

- Food waste will be tipped on the floor, and then loaded into sealed trailers; and
- Clinical waste will be tipped into a bay and moved off in either Ro-Ro or artic trailers.

8.2 Accessibility of Containers

All containers on site will be accessible from more than one side so that a fire could be quickly extinguished. The location of waste storage containers is illustrated on Drawing 02.

8.3 Moving Containers in a Fire

In the event of a fire within a container, the site's ability to move containers quickly would be utilised to reduce the risk of fire spread. The affected container would be moved immediately by site operatives, qualified in the operation of mobile plant, to the quarantine area. The following procedure will be implemented on site:

- When it is safe to do so, the waste containers 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 or water pumped from the fire engine; and
- Burnt waste will be taken off site to a suitably licensed facility within 48 hours.

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

9.0 Prevent Fire Spreading

9.1 Separation Distances

Waste will be stored within bays as illustrated on Drawing 02. Separation distances between the bays 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 buildings and other combustible or flammable materials as illustrated on Drawing 02. Where there is no segregation provided by a firewall, the waste will be at least 6m from the perimeter, buildings and other combustible or flammable materials.

9.2 Fire Walls Construction Standards

The bay walls will be constructed from legio blocks and will be designed to:

- Resist fire;
- Have a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within 4 hours; and
- Have an A1 fire rating.

9.3 Storing Waste in Bay

Table 7-1 above shows the maximum waste storage heights for the proposed site. The following measures will be employed to minimise the risk of fire spreading:

- Waste storage times will be kept to a minimum;
- All waste will be processed on a first-in-first-out basis to keep storage times to a minimum;
- The specification and construction of the bays will offer a thermal barrier exceeding 4 hours;
- The bays will benefit from a freeboard of 1m and open faces will be 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 Quarantine Area

10.1 Quarantine Area Location and Size

The site will benefit from the availability of a designated temporary quarantine area. The area is located to the north east of the WTS building, as illustrated on Drawing 02, and detailed in Table 10-1.
The quarantine area be located on an area which will benefit from impermeable surfacing and a sealed drainage system, and will be large enough to hold at least 50% of the largest combustible stockpile on site, whilst maintaining a 6m separation distance from other combustible materials, and buildings.

Table 0-1 Quarantine Area Dimensions

Quarantine Area	Primary Use	Length (m)	Width (m)	Height (m)	Volume (m^3)
Fire Prevention and Non-Conforming Waste	Dousing of burning/smouldering waste and/or separation of unburnt waste. Separation of non-conforming waste prior to removal from site.	10	9.5	2	190

The quarantine area will be sized to hold 50% of the largest waste stockpile, where the largest bay is the commingled waste bay which will have a maximum volume of 378m^3, and therefore the quarantine area can hold at least 189m^3 of waste. A 6m separation distance will be maintained around all sides of the quarantine area at all times.

The placement of the quarantine areas has been based on the following factors:

- It will allow for the prompt and direct removal of smouldering, burning or fire damaged wastes from the waste storage areas and to allow access by the Fire & Rescue Service (FRS);
- Proximity to flammable liquids – the quarantine area will be situated at least 6m away from any potentially flammable liquids on site such as diesel tanks; and
- Firewater containment – any water used to extinguish a fire within waste moved to the area would be contained in line with the measures outlined in Section 15 below.

10.2 How to Use to Quarantine Area if there is a Fire

The Site Management will instruct all site operatives when and how the burnt/burning waste, or any hot loads delivered accidentally to site, will be moved to the quarantine area. The quarantine area can be used to hold burning waste or unburnt waste. The following procedure will be implemented on site:

- When it is safe to do so, mobile plant will be used to move the waste to the quarantine area. Mobile plant is available at all times;
- The movement of waste will be overseen at all times by the Site Management to minimise any spillages and to ensure the area is not overfilled;
- To limit spillages, plant will not be overfilled when moving waste;

- If the waste is burning/smouldering it will be doused using the relevant fire extinguisher, a fire hose supplied by the FRS or water pumped from the 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 a fire, any non-compliant waste will be removed from the quarantine area within 1 hour and temporarily stored at least 6m away from any other combustible material or ignition sources on site.

11.0 Detecting Fires

11.1 Detection Systems in Use

CRL propose to commission Helios Systems Ltd to design, supply, install, test and commission the site's fire detection and alarm systems. The proposed fire detection system will utilise PYROsmart panoramic early detection thermal imaging cameras, which will constantly scan the area for temperature irregularities in real time. The system will be designed to provide full coverage of the WTS building, which is where all waste storage will be undertaken.

If an alarm were to be triggered, during operational hours a suitably trained site operative would investigate the hotspot immediately and determine the best course of action if safe to do so. The control panel will indicate that there is a heat spot and the water cannons will be directed to this area.

Out of operational hours, the nominated contacts will be alerted via mobile phone, and the water cannons will be triggered to the specific heat spot. If a surface fire is detected the suppression system will automatically initiate following a 30 second warning via visual and audible alarms.

Details of the proposed fire detection system is included as Appendix A.

In addition, the proposed site will be operational from 6am to 6pm Monday to Sunday (excluding Christmas Day or New Years Day). During operational hours, the site will be constantly manned by operatives who are trained in the early detection and management of fires. Site operatives will visually inspect waste storage areas for any signs of anomalies such as signs of heat, steam, or vapour to ensure the early detection of fires in waste storage areas. Anomalies will be actioned immediately by investigation and remedial action will be taken such as the rotation of waste within the storage area or the removal of heated waste which would be put in the quarantine area for assessment. In addition, site operatives will be asked to remain vigilant at all times and look out for signs of fire. Staff will be trained in how to identify fires and fire hazards on site. Staff will also receive training on the use and selection of fire extinguishers, site evacuation procedures, fire safety, and all relevant procedures.

11.2 Certification for the Systems

The fire proposed fire detection system will be certified to British Standard BS5389, as evidenced by Appendix A.

12.0 Suppressing Fires

12.1 Suppression Systems in Use

CRL propose to commission Helios Systems Ltd to design, supply, install, test and commission the site's fire suppression system. The suppression system will be designed to be fully integrated with the detection system described in Section 11.1 above, and will utilise water cannons. The water cannons will be designed to provide full coverage of the WTS building, which is where all waste storage is undertaken.

In the event of a fire, the directional water cannons would be activated, to allow for any potential fire to be automatically managed at the earliest possible stage through targeted suppression.

Foam, water, carbon dioxide and powder extinguishers will be provided throughout the site, in addition to a fire hose. The extinguishers will be inspected annually. The local FRS will assume full control for the approach to suppression/extinguishing of any fire once it is in attendance at the site.

The WTS building will be constructed to the appropriate standards. Should fire compromise the stability or integrity, the building and site will be immediately evacuated.

12.2 Certification for the Systems

The proposed automatic fire detection system will be certified to British Standard BS5389, as evidenced by Appendix A.

13.0 Firefighting Techniques

13.2 Active Firefighting

The closest fire station is Aldington Fire Station to the west of the site. Using Google[6] directions and mapping, the drive time is approximately 9 minutes and it is approximately 4.3 miles between the site and the fire station.

The site's proposed operational hours are between 6am and 6pm Monday to Sunday (excluding Christmas Day or New Years Day). To ensure that the FRS can access the site outside of operational hours, a locked FRS Information Box will be fitted to the outside of the site gate which will contain site keys, and a copy of the FPP. The code to the box will be provided to the FRS to ensure that they will be able to gain immediate access to the site outside of operational hours.

13.1.1 Firefighting and Fire Hoses

See section 12.1 for details on fire extinguishers and fire hoses. Fire extinguishers and/or hoses will be used in the following circumstances:

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

13.1.2 Small Fire

As detailed in Sections 11, and 12 above CRL propose to install an automatic Helios fire detection and suppression system. Upon detection of a heat spot inside or outside of operational hours the automatic suppression system would be activated, and the directed water cannons would begin the fire fighting process.

During operational hours, suitably trained site operatives will investigate the hotspot immediately and determine the best course of action. Potential courses of action could include:

- Utilising mobile plant to pull the affected waste into the open away from other waste that the fire could spread to;
- Depending on the size/nature of the fire the waste will either be:
    - Extinguished immediately[7] utilising the fire extinguishers or hoses; or
    - Moved to the appropriate quarantine area and extinguished[8].

Depending on the size, location and nature of the fire the burning waste will be pulled into the dedicated quarantine area following the procedures detailed in Section 10.2.

[6] Google Maps, accessed in March 2024
[7] 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 or fire hose 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.
[8] 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.

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 procedures, detailed in this section, will be implemented should this be the case.

Competent staff will be available throughout operational hours to operate waste handling plant.

13.1.3 Uncontainable Small Fire or Large Fire

The following procedure will be 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:

- The Helios automatic detection and suppression system will be activated to start the directed fire fighting process using the water cannons;
- The Site Manager and FRS will be notified immediately and the EA as soon as practicable;
- 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;
- The 500,000 litre on-site water tank.

14.2 Water Supply Calculation

Based upon the EA's FPP Guidance firewater calculations, it is estimated that approximately 453,826.8 litres (453.826m^3) of water would be required to put out the largest combustible stockpile on the current site[9].

Table 14-1 Fire Water Calculation

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	
378	2,521.26	453,826.8	500,000 litre water tank

15.0 Managing Fire Water

15.1 Containing the Run-Off from Fire Water

The site's proposed drainage system is illustrated on Drawing 02. The WTS building will benefit from impermeable surfacing with a sealed drainage system. It is proposed that the area of land within the EP boundary which lies to the east of the weighbridge will consist of unmade ground, as illustrated on Drawing 02. At this stage no waste infrastructure or operations will take place within this area, and all waste operations will be undertaken on impermeable surfacing within the area to the west of the weighbridge. However, CRL wish to include the unmade area of land within the EP boundary at this stage to future proof the site, and provide operational flexibility going forwards. As market conditions dictate, this area of land can

[9] Based on a 378m^3 stockpile being the largest combustible pile on the current site and it requiring 6.67 litres of water per cubic metre to extinguish. 6.67 * 378 = 2,521.26 litres/min. 2,521.26 * 180 = 453,826.8. litres/3hours.

be developed by CRL as and when required. Until such a time, the land will not be used for any waste activities that require EA regulation.

All waste storage will take place within the WTS building, and any water released from the water cannons via the proposed Helios System or through firefighting will be contained within the building. Booms will be used to block the WTS building entrance, and ensure that water is contained. Within operational hours, upon detection of a fire, site operatives will be responsible for placing the booms at the WTS building entrance. Outside of operational hours, the duty manager will be contacted by mobile phone via the helios automatic detection system and would attend site within 1 hour to ensure that the booms were deployed. Fire water contained within the building, would be drawing off into tankers and transported off site to an appropriate treatment facility following testing.

The site will benefit from a sealed drainage system, with surface water discharged through the attenuation pond with a penstock controlled discharge to sewer. To prevent the release of fire water through the attenuation pond, the duty manager would close the penstock valve upon detection of a fire. Outside of operational hours, the duty manager would be contacted by mobile phone via the helios automatic detection system and would attend site within 1 hour to close the penstock valve to prevent the release of firewater from the site.

16.0 During and After an Incident

16.1 Dealing with Issues During a Fire

The site will not continue to accept waste if there is an active fire on site. 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 will be included in Appendix B. In the event of a fire the following procedure will be followed:

- Nominated employees will be responsible for locating the emergency list included in Appendix B;
- In the event of a large fire, 99 will be dialled first;
- Nominated individual will phone each of the local businesses included in Appendix B to keep them informed 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 and an online incident report will be completed to 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 a suitably licensed facility, as described above.

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

A visual assessment will be carried out by the Site Management and 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.

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 burnt material will be transferred off site to a suitably permitted disposal facility.

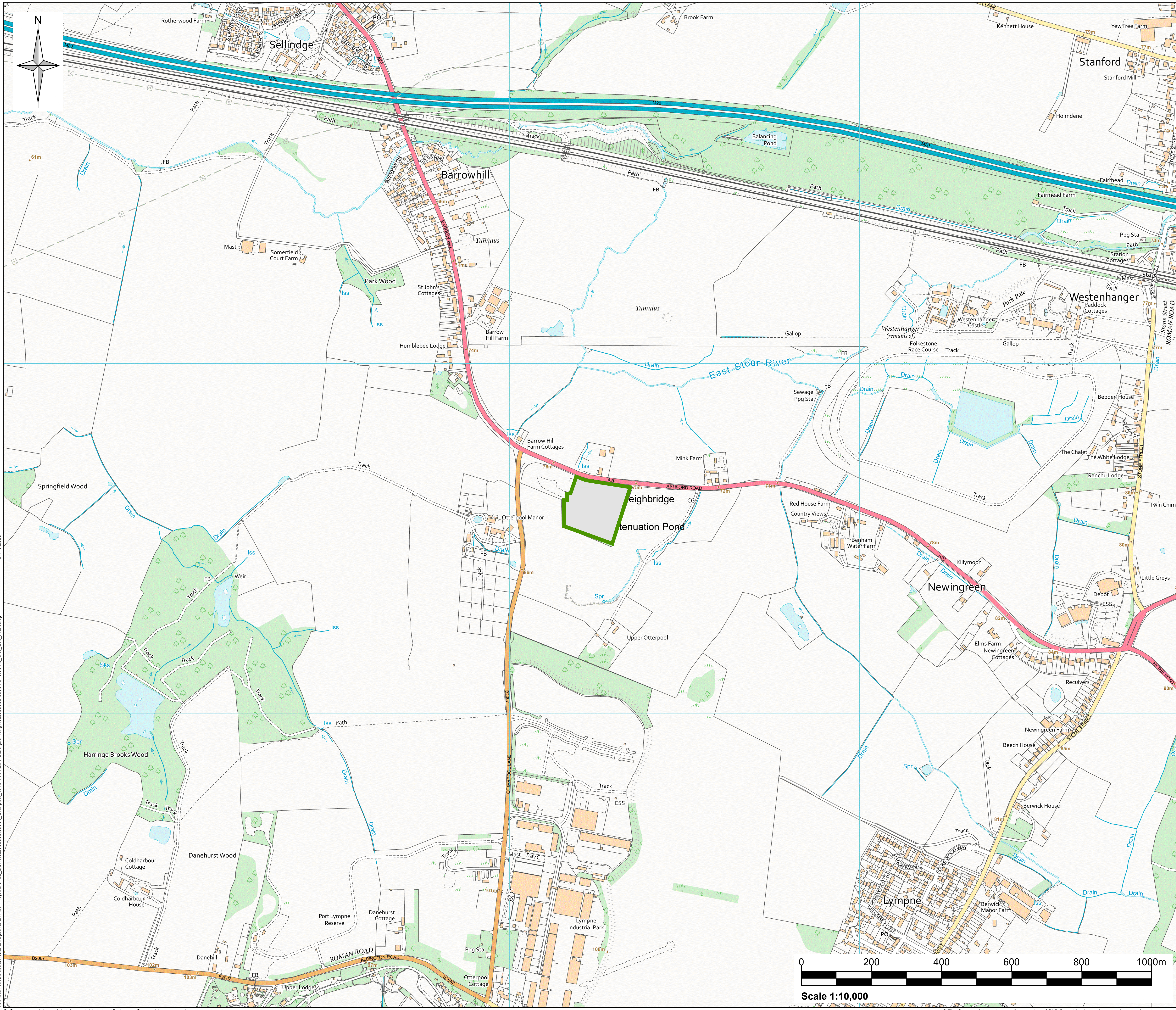
17.0 Conclusion

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; 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.

Drawings



Legend:

Environmental Permit Boundary

Rev	Amendments	Date	By	Chk	Auth

www.slrconsulting.com

Client
Countrystyle Recycling Limited

Project
Otterpool Waste Transfer Station
Environmental Permit Application

Figure Title
Site Layout Plan

Scale		SLR Project No.	
1:10,000 @ A3		402.065068.00001	
Designed	Drawn	Checked	Authorised
	TS	MF	GS
Date	Date	Date	Date
	Oct 2023	Oct 2023	Oct 2023
Figure Number			Rev.
01			0

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Legend:

- Environmental Permit Boundary
- Building
- Hardstanding
- Soft Ground
- Unmade Ground
- Quarantine Area
- Mobile Plant Storage Area

Storage Bays

- Comingled
- Bulky
- Paper and Cardboard
- Residual
- Street Sweepings
- Garden Waste
- Clinical Waste
- Bulky POPS's
- Food waste

Rev	Amendments	Date	By	Chk	Auth

SLR

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Client: Countrystyle Recycling Limited

Project: Otterpool Waste Transfer Station
Environmental Permit Application

Figure Title: Environmental Permit Boundary and Site Layout

Scale	SLR Project No.
1:1000 @ A3	402.065068.00001

Designed	Drawn	Checked	Authorised
	TS	GS	

Date	Date	Date	Date
	Oct 2023	Oct 2023	

Figure Number: **02** Rev.: **0**

27/03/2024

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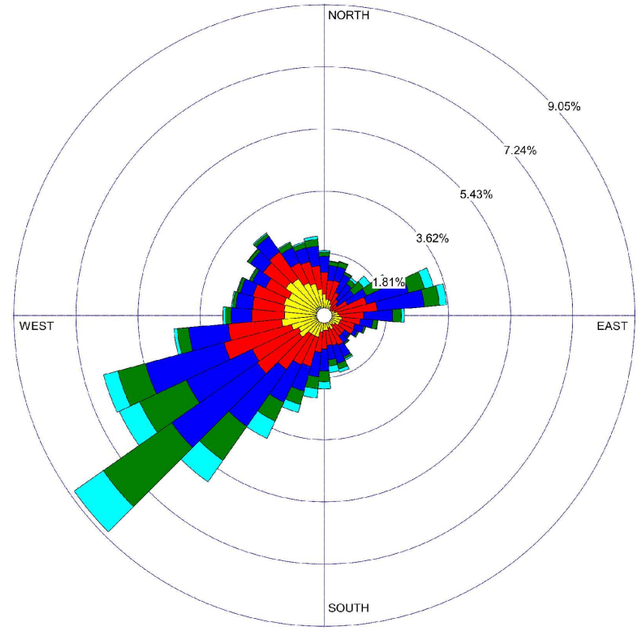
Legend:

- Environmental Permit Boundary
- 500m Offset Boundary
- 1km Offset Boundary
- Local Road Network
- Commercial / Industrial
- Residential
- Open Ground / Woodland
- Open Water / Ditches
- Railway

Lydd Meteorological Station
2016 - 2018



0 200 400 600 800 1000m

Scale 1:10,000

Rev	Amendments	Date	By	Chk	Auth
1	Increased boundary offset	03/24	TS	KH	GS

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Client: Countrystyle Recycling Limited

Project: Otterpool Waste Transfer Station
Environmental Permit Application

Figure Title: Local Receptors

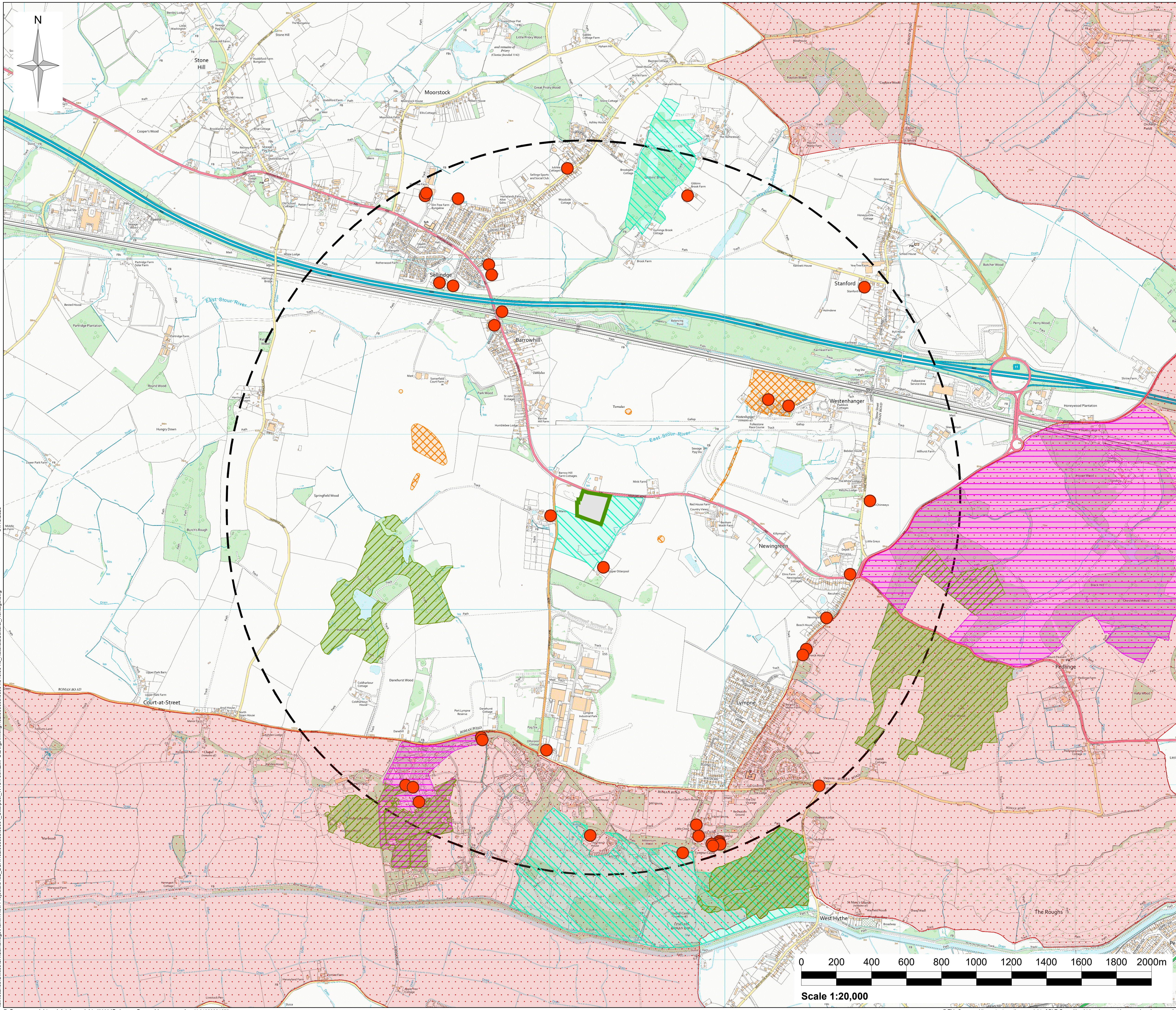
Scale	SLR Project No.
1:5000 @ A3	402.065068.00001

Designed	Drawn	Checked	Authorised
	TS	MF	GS
Date	Date	Date	Date
	Oct 2023	Oct 2023	Oct 2023

Figure Number: 03 Rev.: 1

15/03/2024

\\slr.local\eu\Offices\UK\Cambridge\Admin\New Projects\0402_BOA\402.065068.00001_Otterpool_WTS\Tech\EMP\CD\wgis\Wking\402.065068.00001.013.003.1_Local_Receptors_Plan.dwg



Legend:

- Environmental Permit Boundary
- Area of Outstanding Natural Beauty
- Listed Building
- Scheduled Monument
- Registered Park or Garden
- Ancient Woodland
- Site of Special Scientific Interest (SSSI)

Rev	Amendments	Date	By	Chk	Auth

SLR

www.slrconsulting.com

Client
Countrystyle Recycling Limited

Project
Otterpool Waste Transfer Station
Environmental Permit Application

Figure Title
Cultural and Natural Heritage

Scale		SLR Project No.	
1:20,000 @ A3		402.065068.00001	
Designed	Drawn: TS	Checked: MF	Authorised: GS
Date	Date: Oct 2023	Date: Oct 2023	Date: Oct 2023

Figure Number: 04
Rev.: 0

31/10/2023

\\slr.local\eu\Offices\UK\Cambridge\Admin\New Projects\0402_BOA\402.065068.00001_Otterpool_WTS\Tech\EMPC\Dwgs\Wiring\402.065068.00001.013.004.0_Natural&Cultural_Heritage.dwg

Appendices

Appendix A Fire Detection and Suppression System

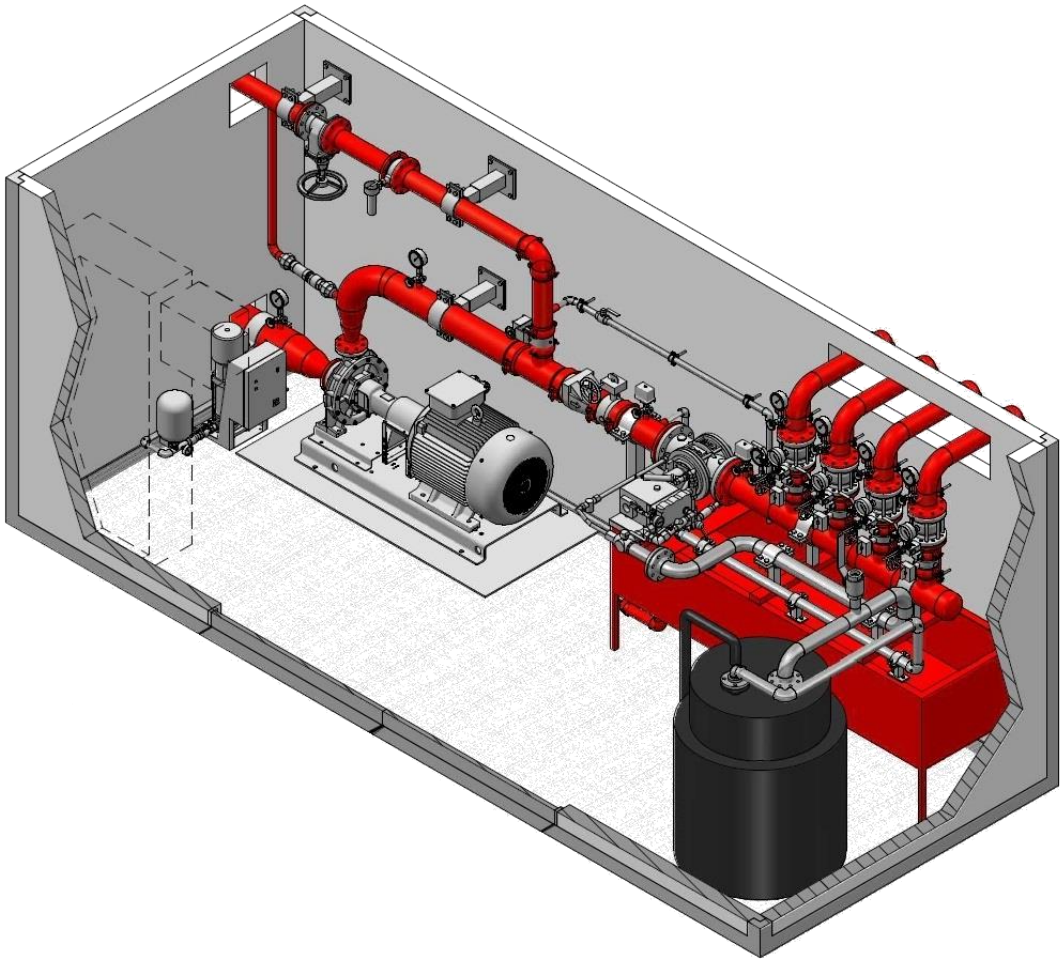
A.T.F.S.® Project planning document

Two zone A.T.F.S.® system for MRF installation at:

COUNTRY style RECYCLING

Otterpool.

Version 1:0 28th November 2023



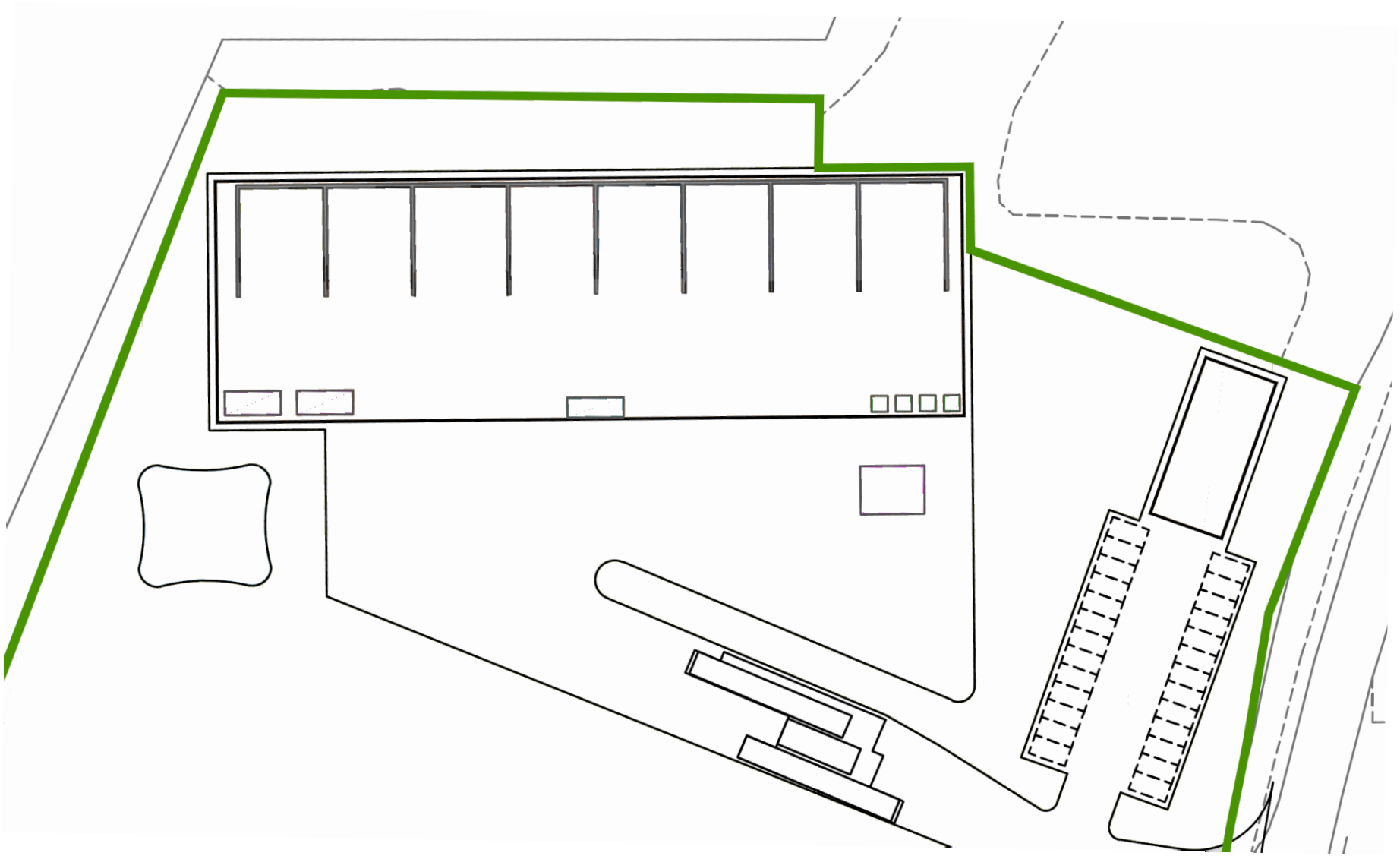
Helios Fire Systems Ltd
The Tannery
Water Street
Portwood
Stockport
SK1 2BP
Tel:0161 503 1626

AUTOMATIC TARGETED FIRE SUPPRESSION SYSTEMS

Helios A.T.F.S.® Project operational layouts

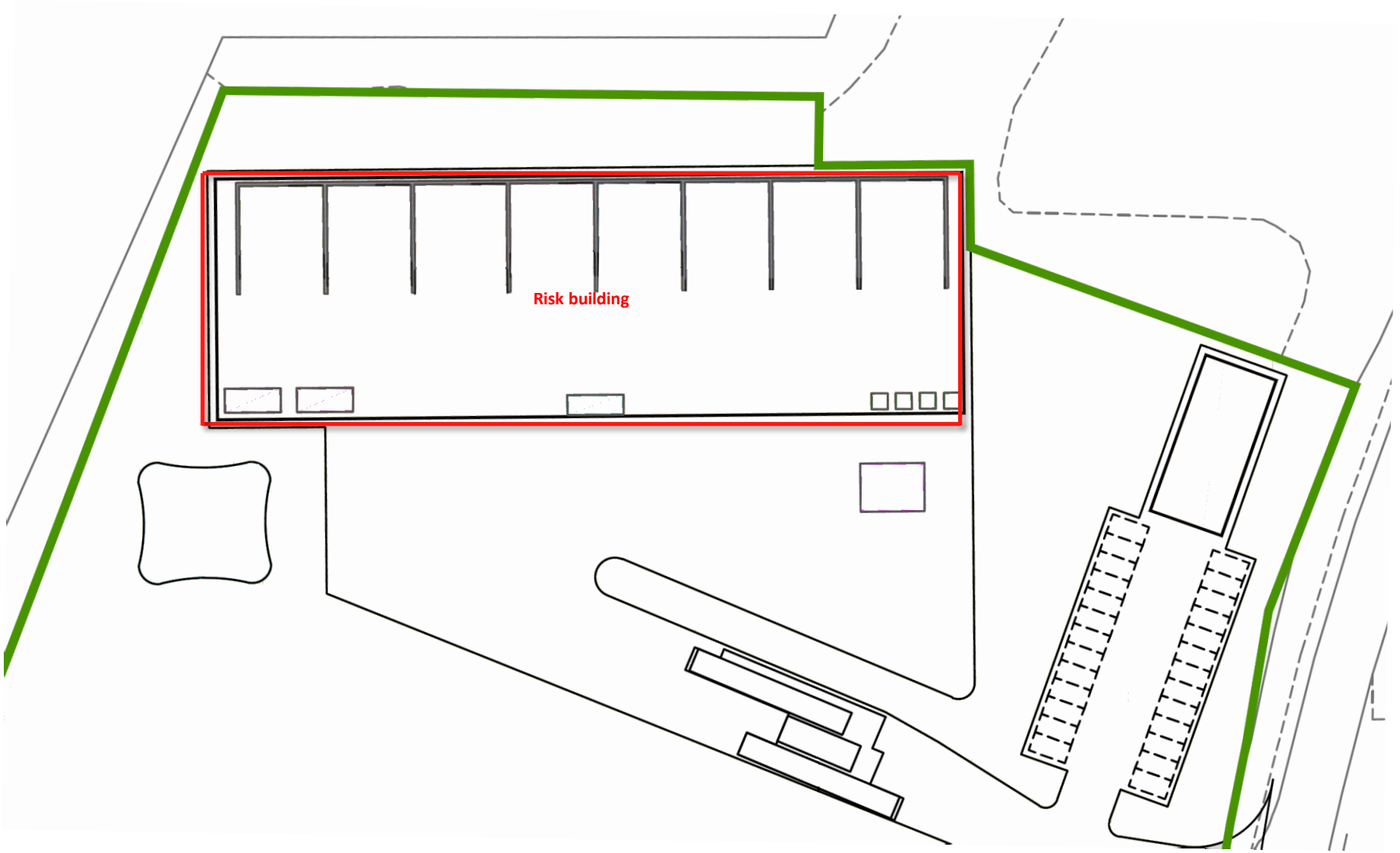
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® Site plan layout



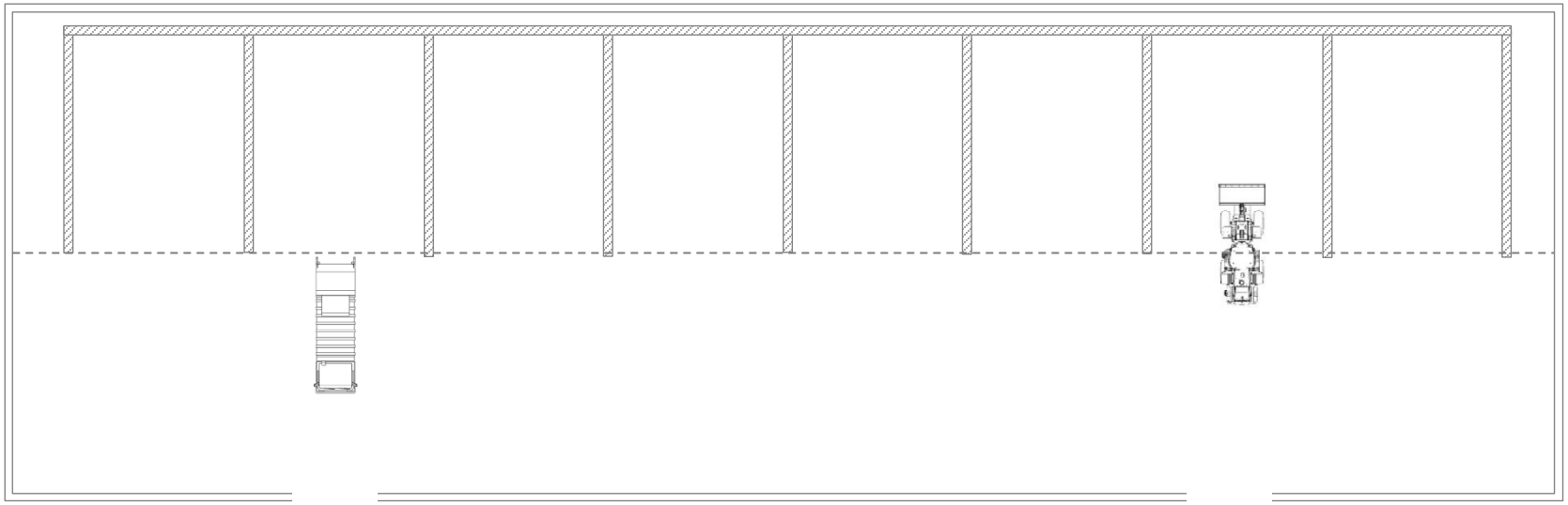
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® Site layout with risk building



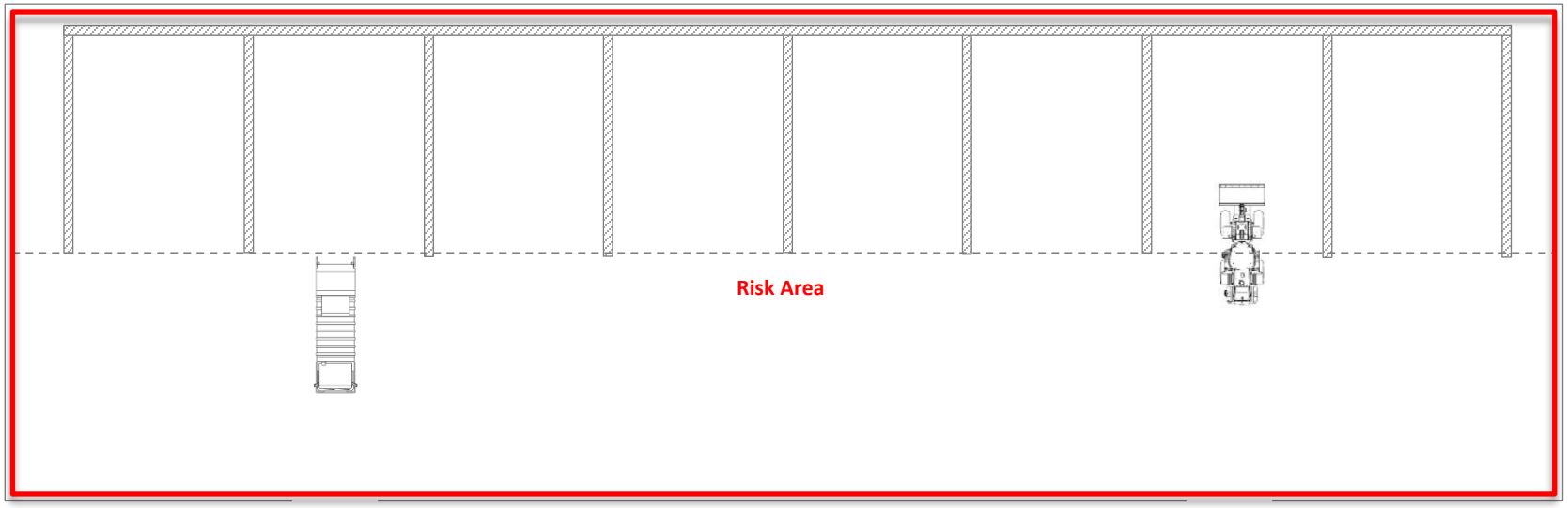
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® Building plan



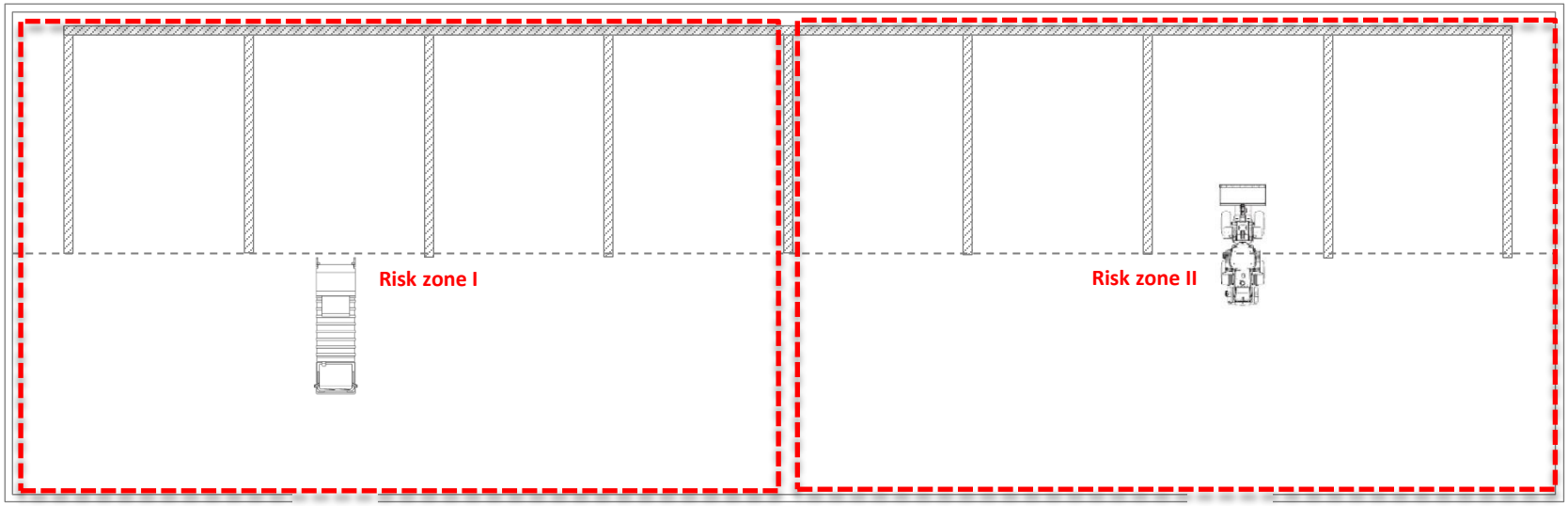
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® Risk area



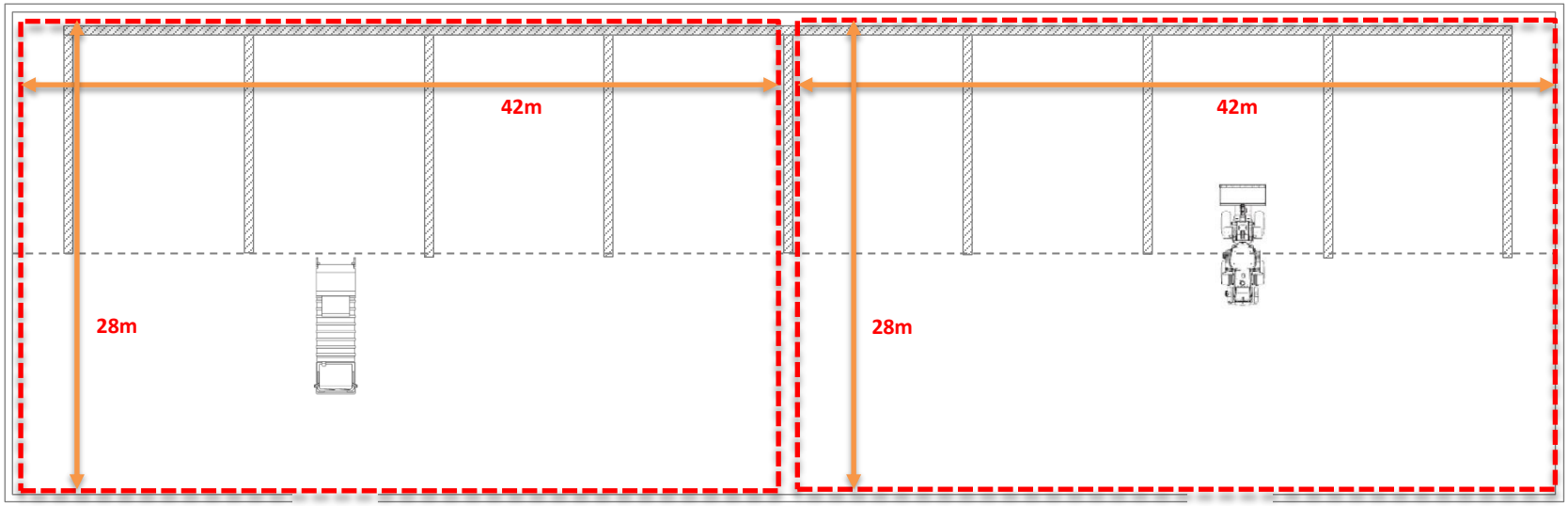
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® Risk zones



Countrystyle Recycling (Otterpool) Two zone ATFS project

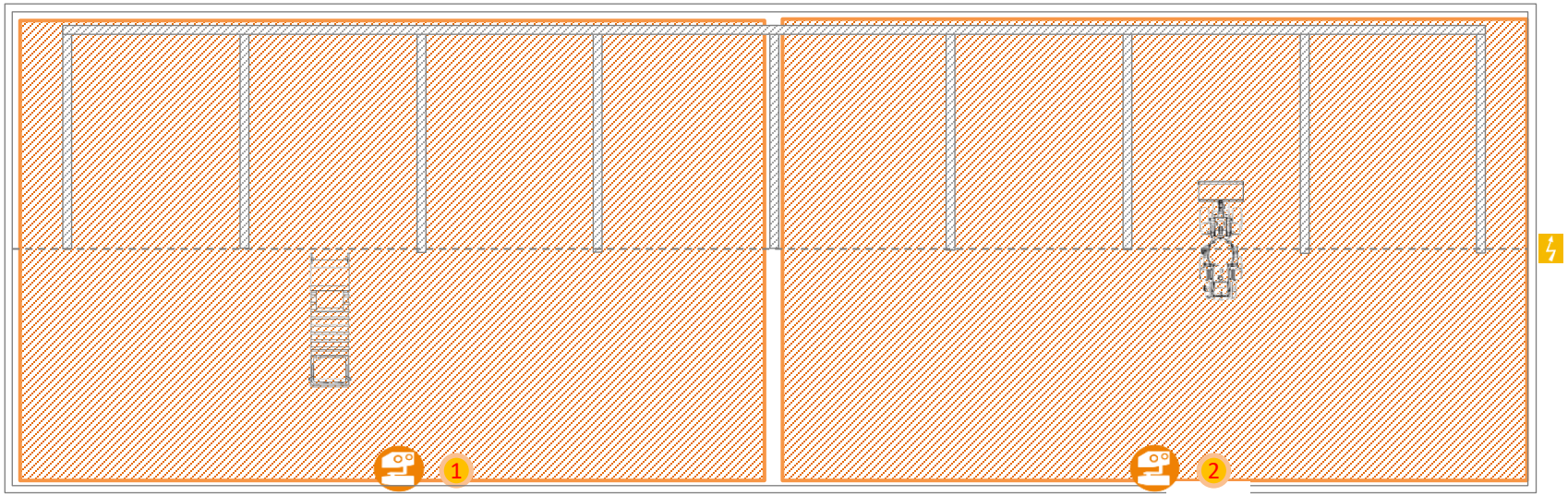
Helios A.T.F.S.® PYROsmart® Risk zone dimensions



Helios A.T.F.S.® PYROsmart install

Countrystyle Recycling (Otterpool) Two zone ATFS project

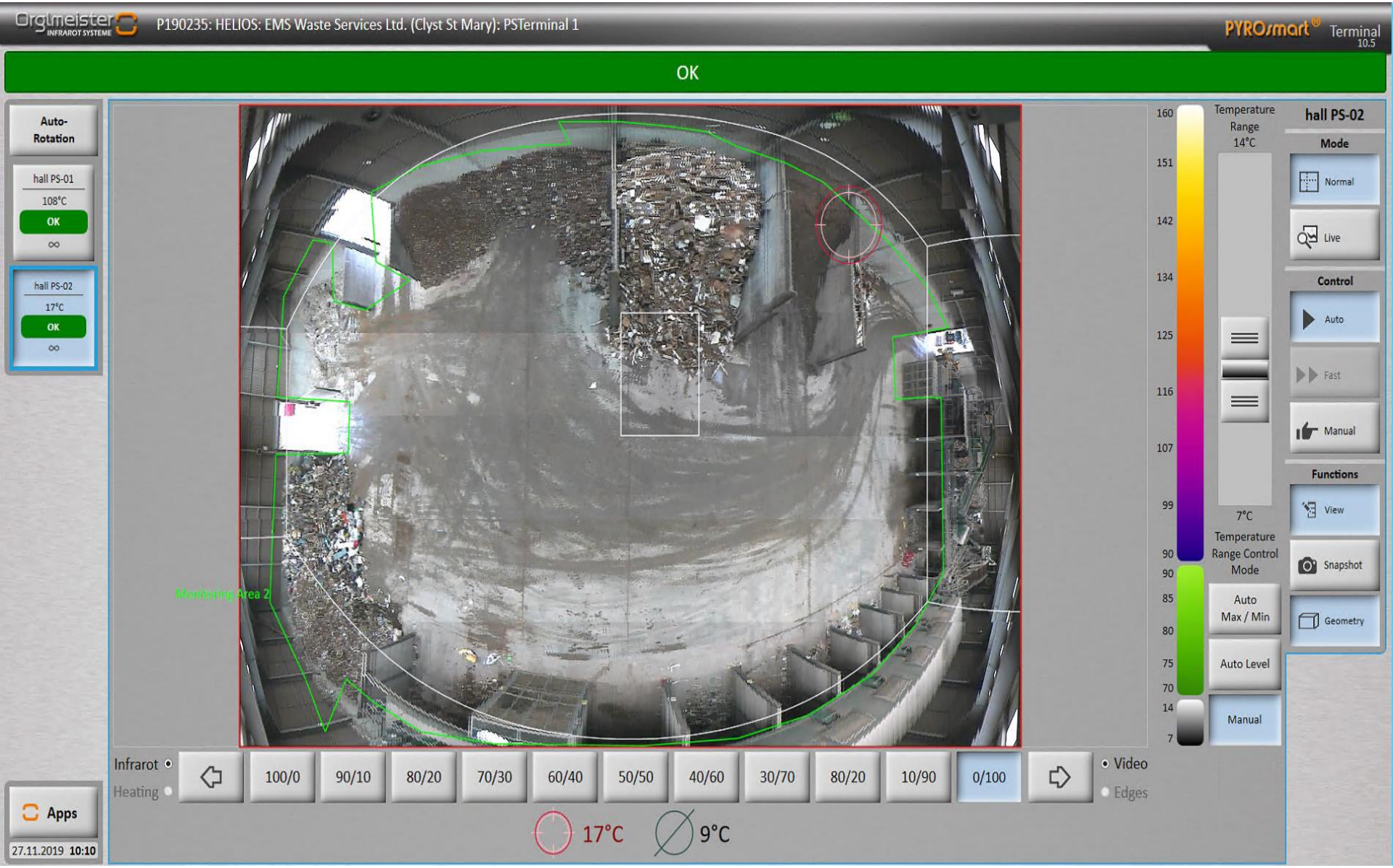
Helios A.T.F.S.® PYROsmart® Early warning heat detection scope of detection



The above detection zones are designed to cover the entire of the building including the plant if required. This is only a reflection of the intended scope of detection as requested but a site survey will need to be conducted to assess building for dimensions and scope of detection from eaves. The camera system would need to be a minimum of 6m from the floor to eaves steels to give optimum detection area.

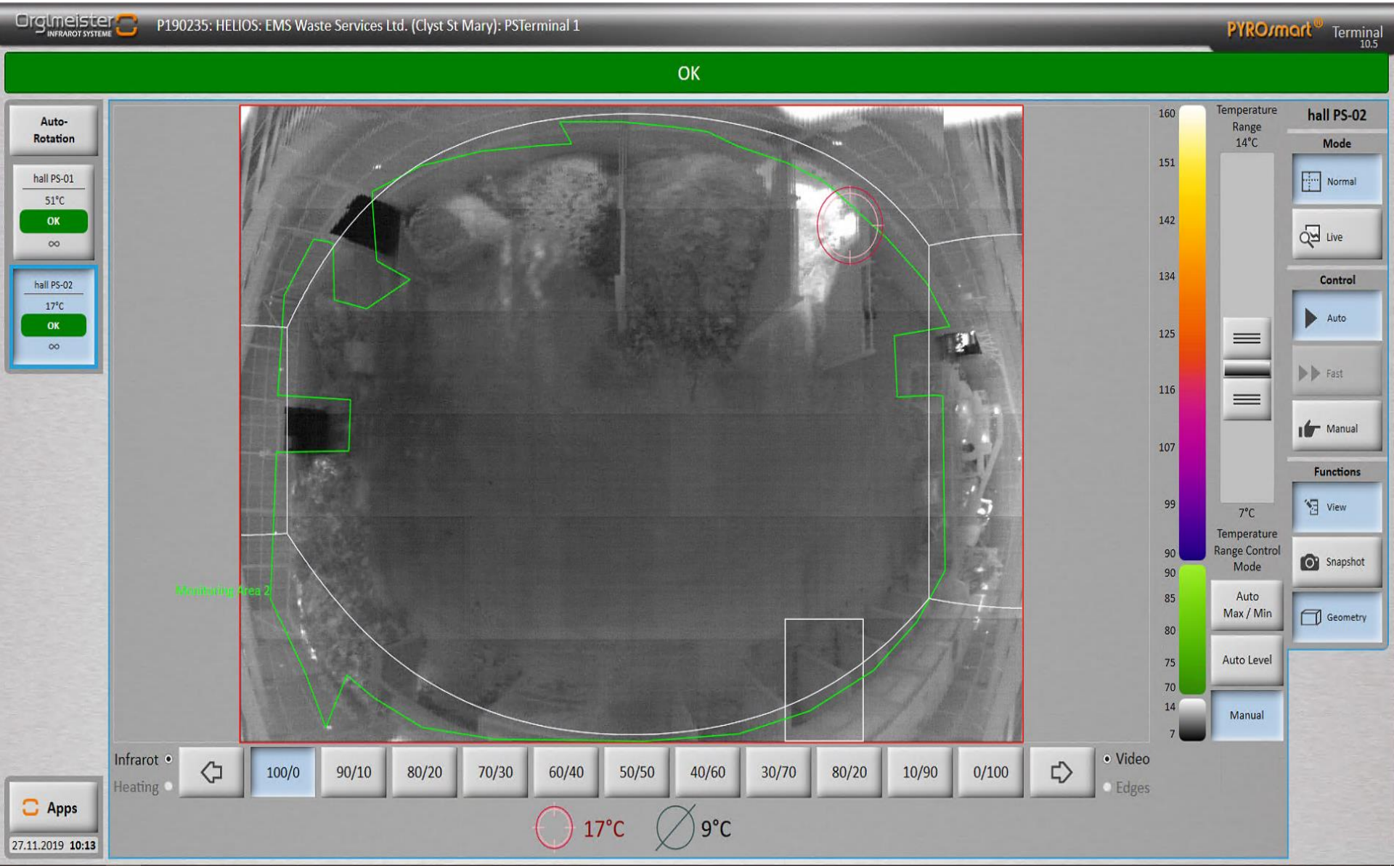
Devon county council (Brynsworthy) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® camera real time visual images



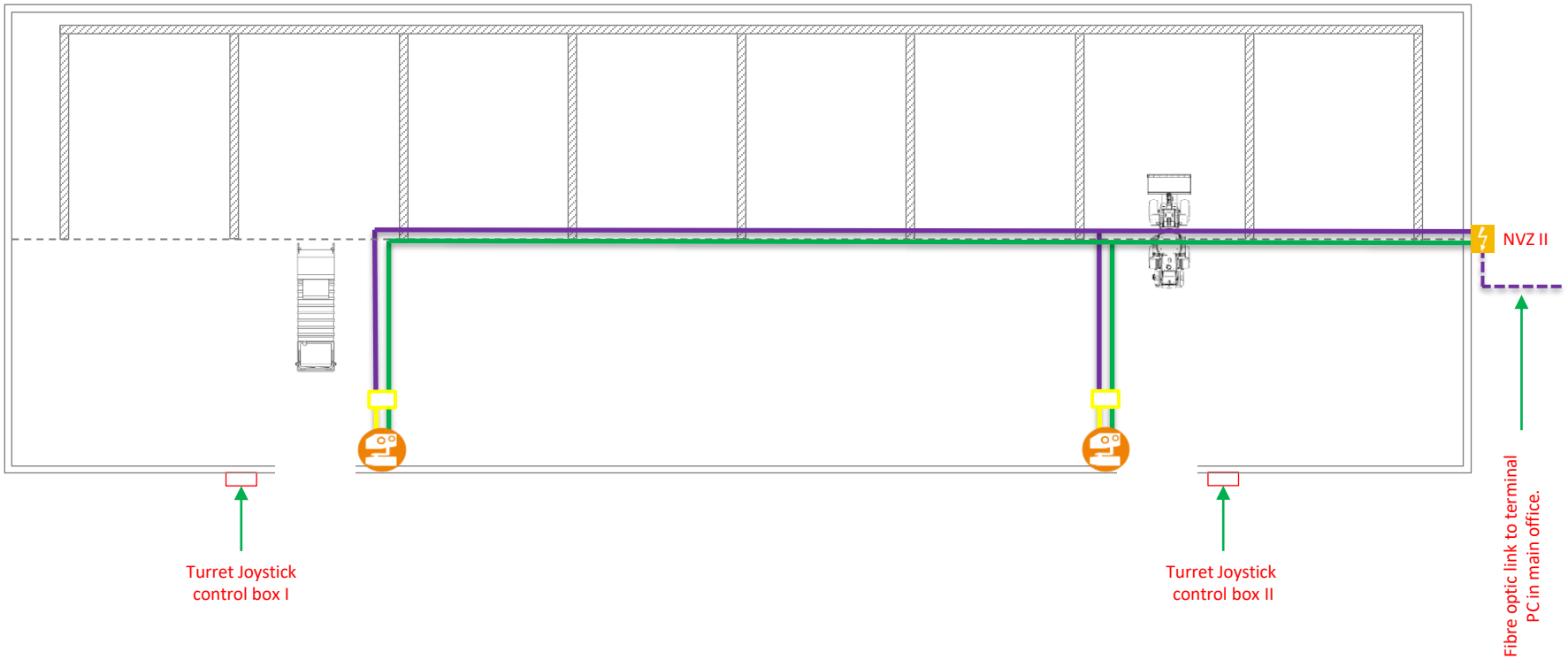
Devon county council (Brynsworthy) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® camera real time thermal images



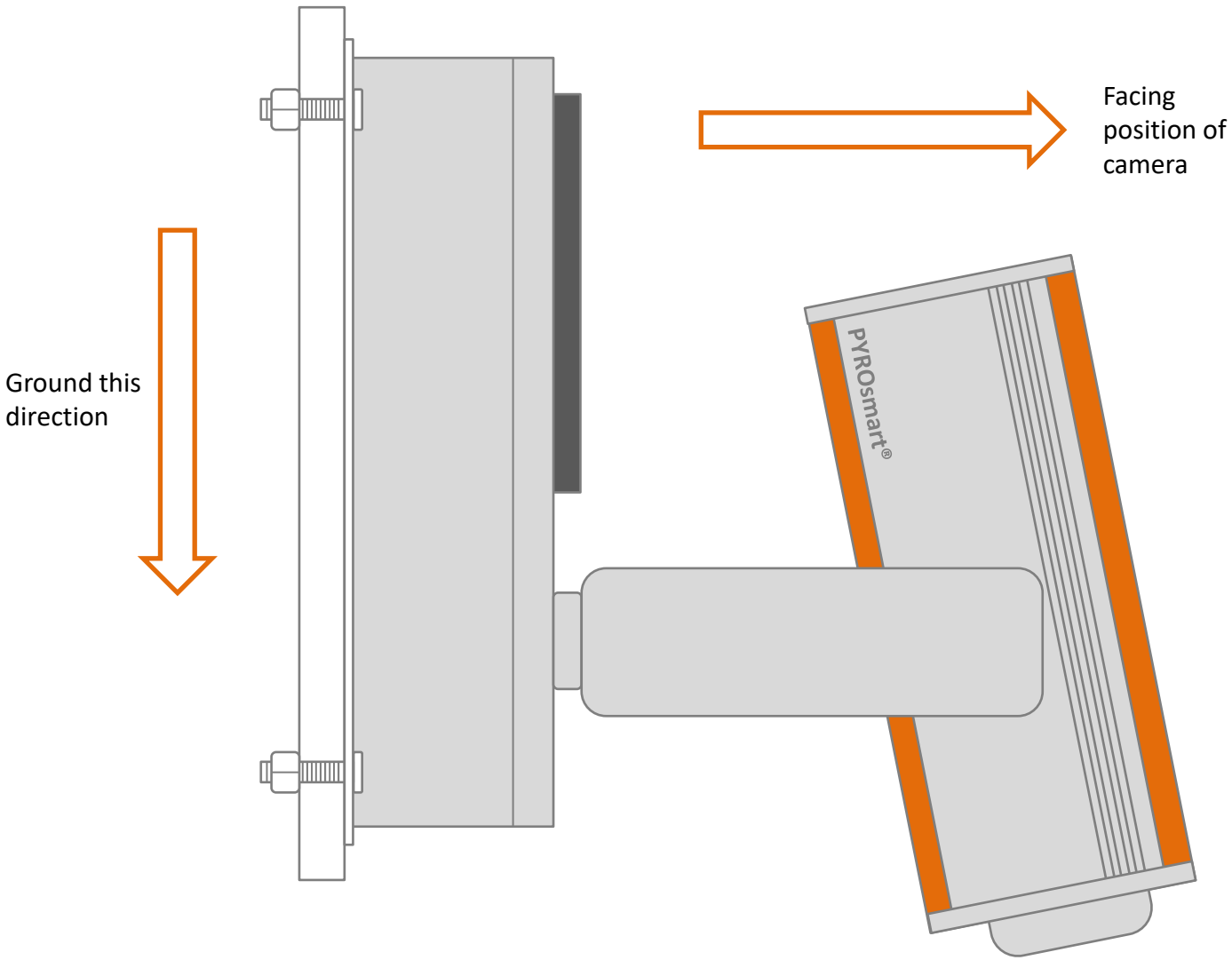
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® PYROsmart® Cabling plan



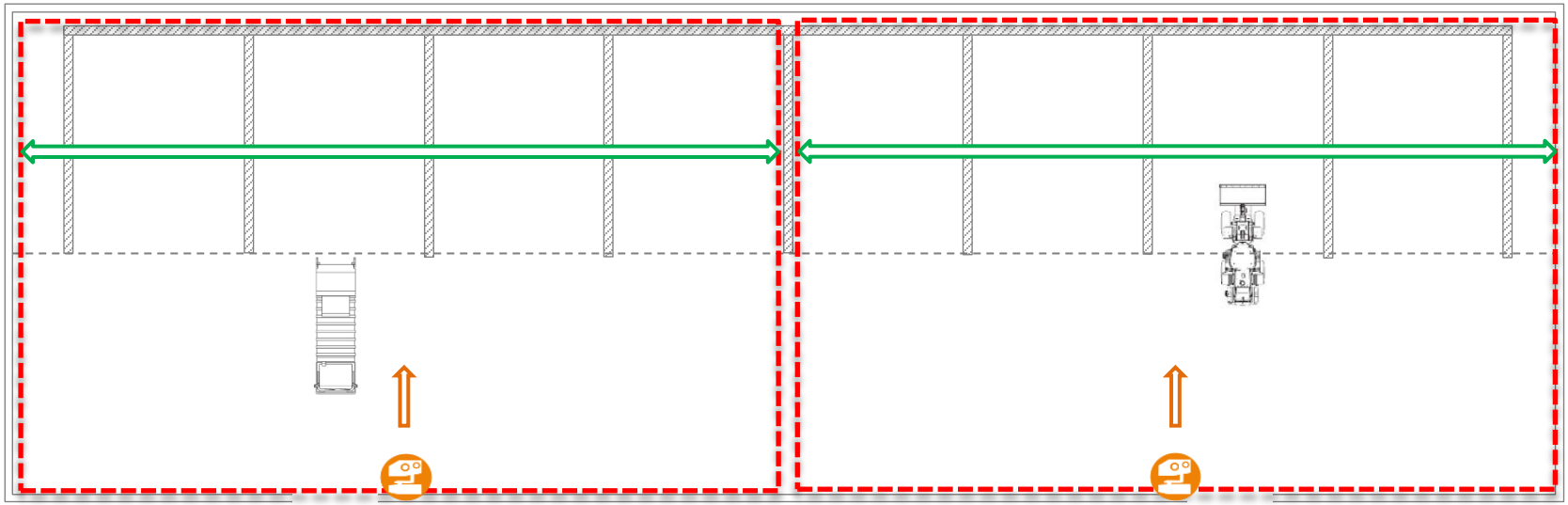
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios PYROsmart® Camera mounting and direction



Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios PYROsmart® Direction of camera and scan direction

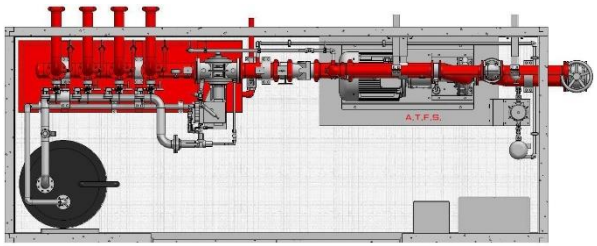


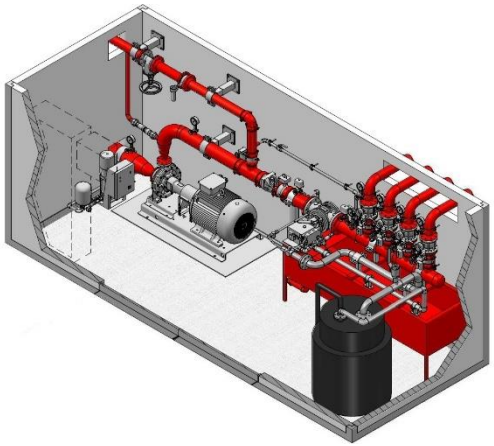
Scan direction of camera

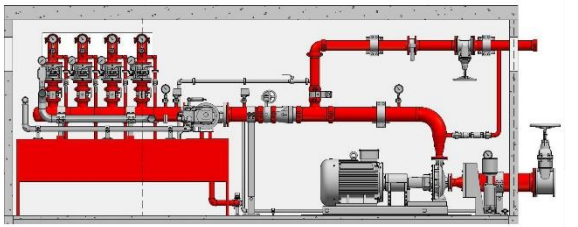
Facing position of camera

Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® Automatic targeted fire suppression

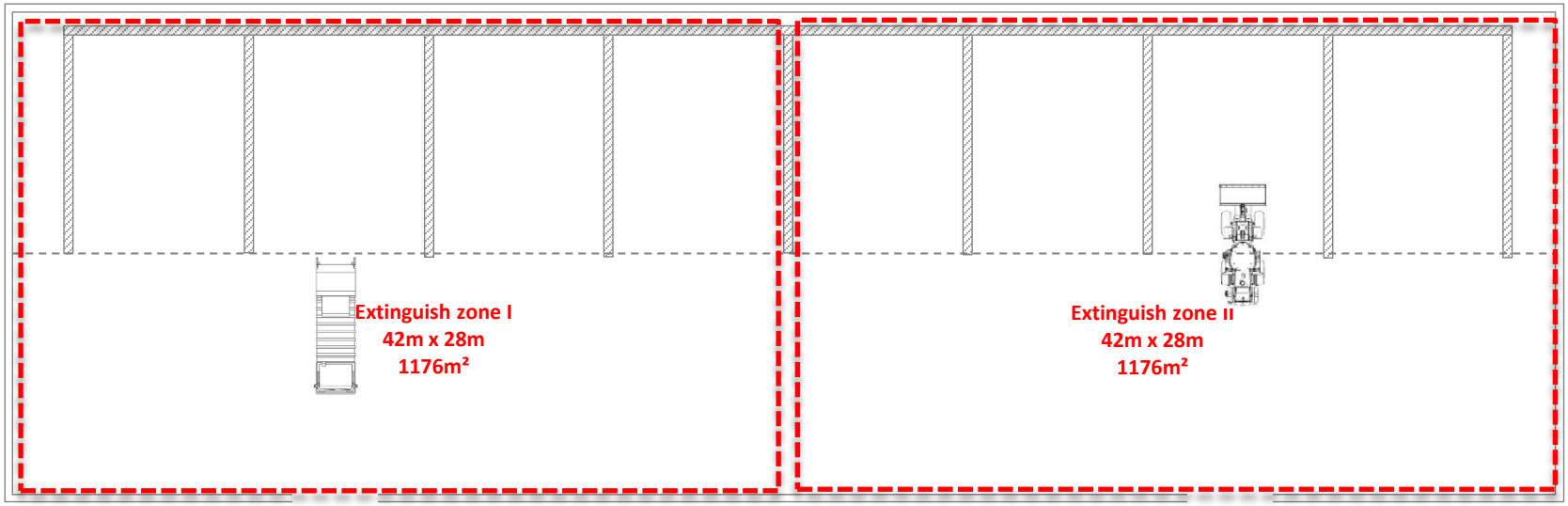






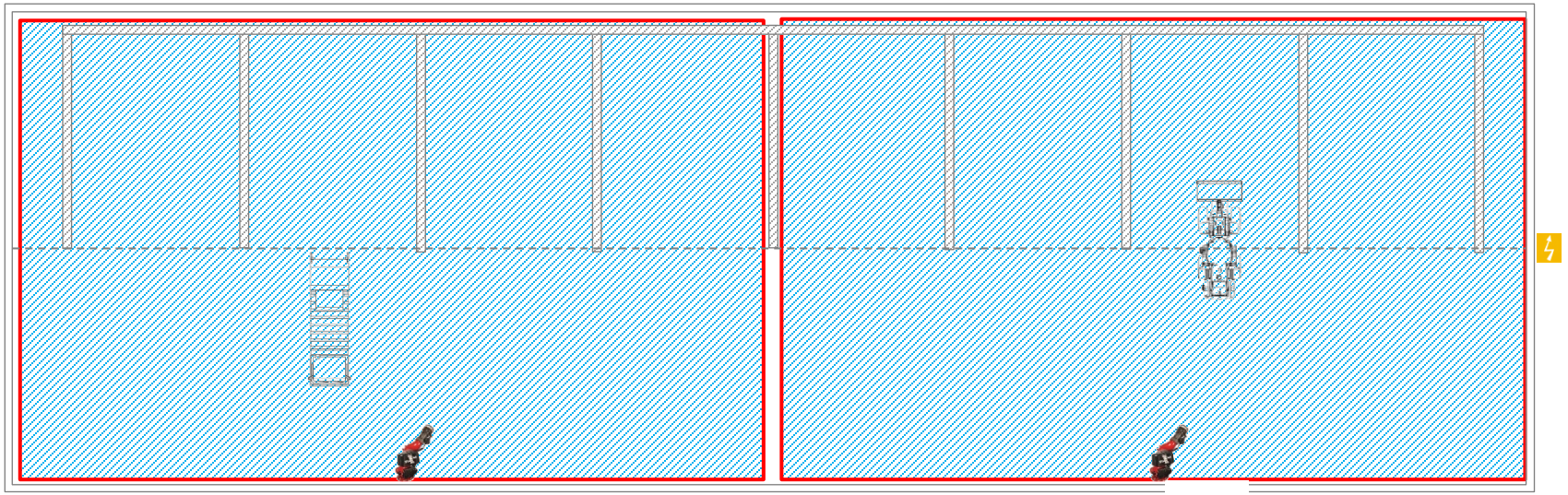
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® suppression zone dimensions



Countrystyle Recycling (Otterpool) Two zone ATFS project

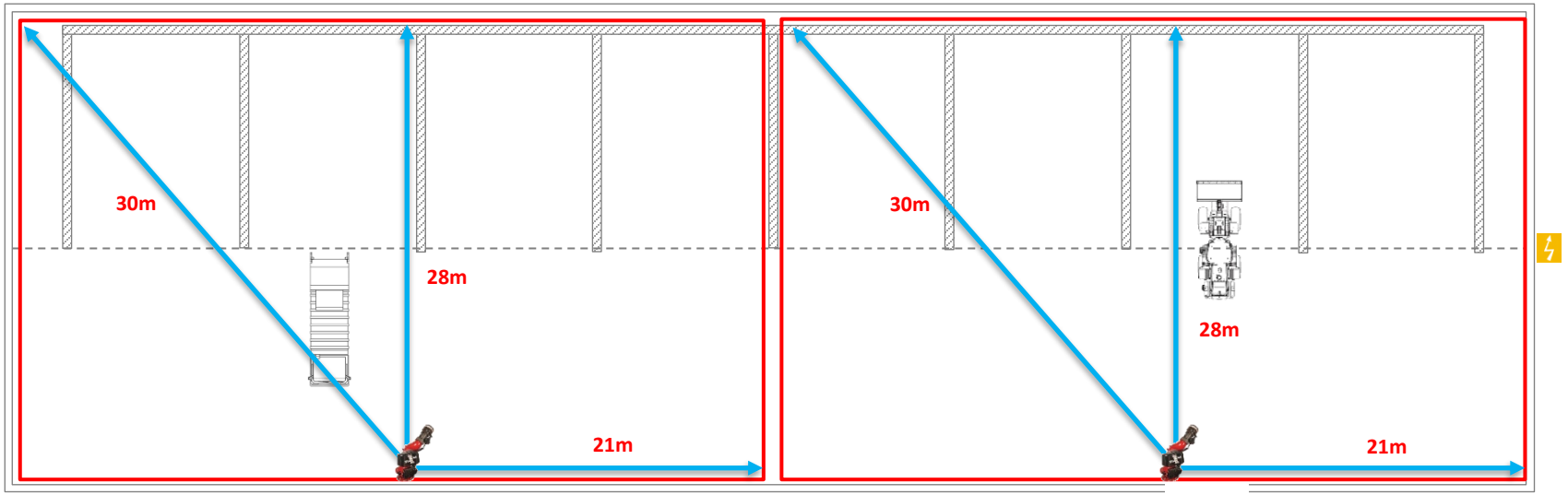
Helios A.T.F.S.® suppression attack zones



The above suppression zones are designed to cover the entire of the building including the plant if required. This is only a reflection of the intended scope of suppression as requested but a site survey will need to be conducted to assess building for dimensions and scope of suppression from eaves. The cannon system would need to be a minimum of 8m from the floor to eaves steels to give optimum suppression area

Countrystyle Recycling (Otterpool) Two zone ATFS project

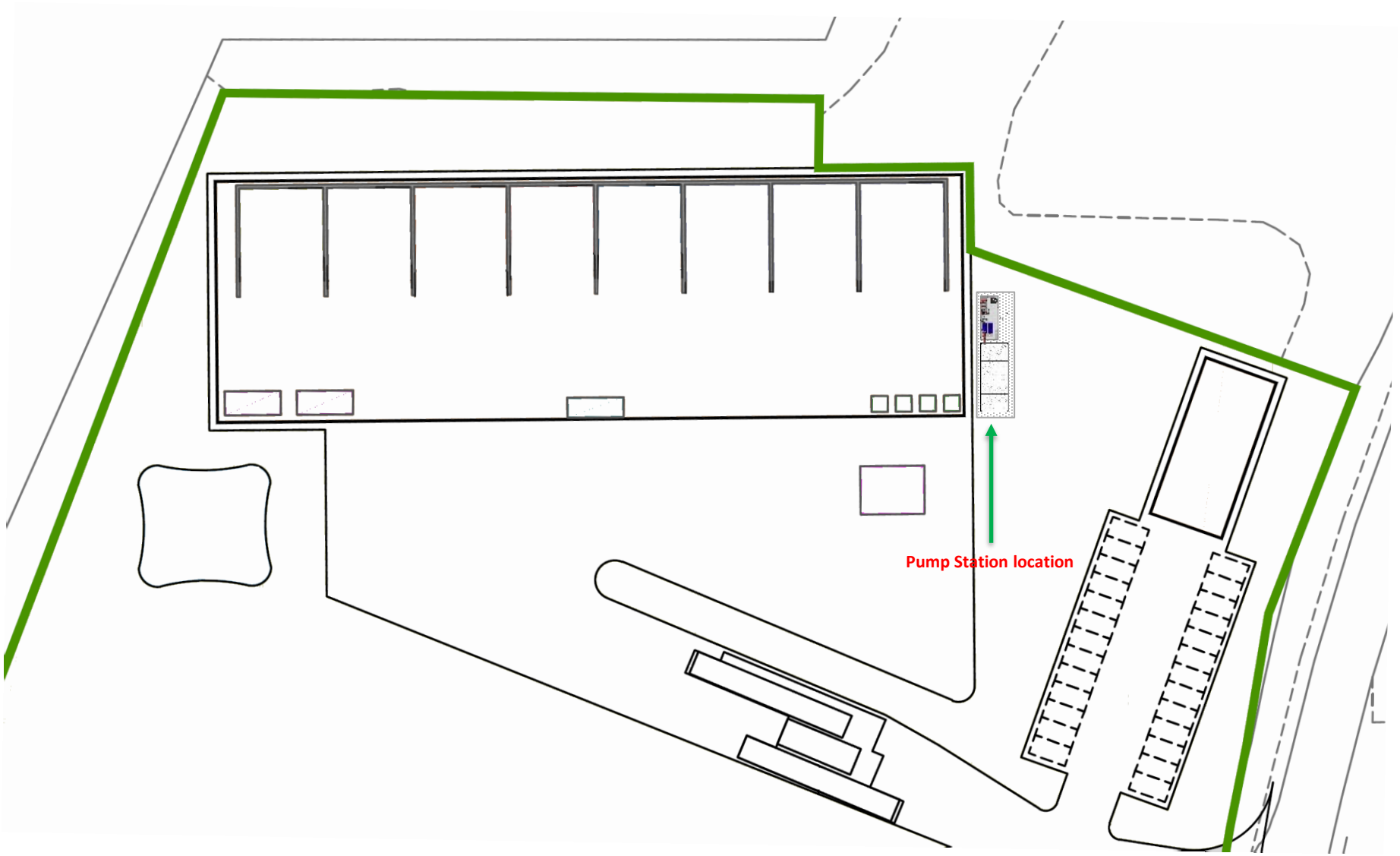
Helios A.T.F.S.® Zone max protection dimensions



Maximum throw distance of cannon 60m at 1500l/min @ 10bars

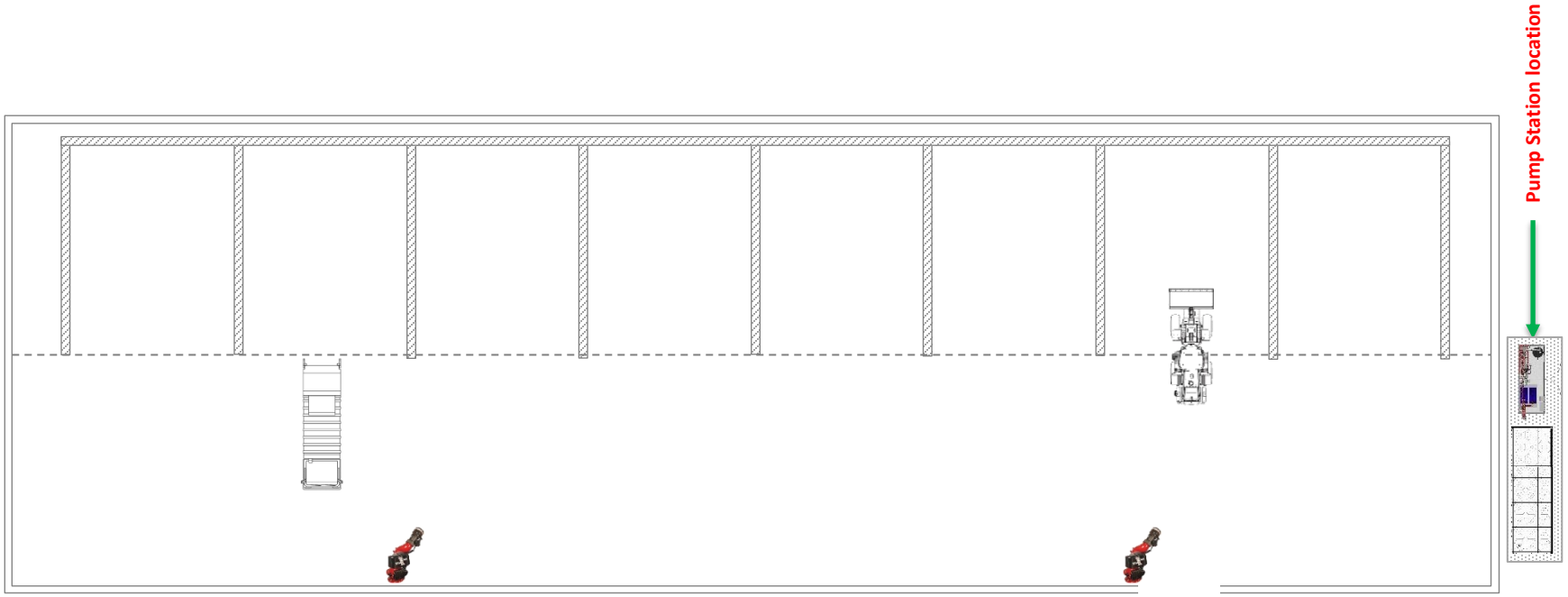
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® system proposed pump station pad



Countrystyle Recycling (Otterpool) Two zone ATFS project

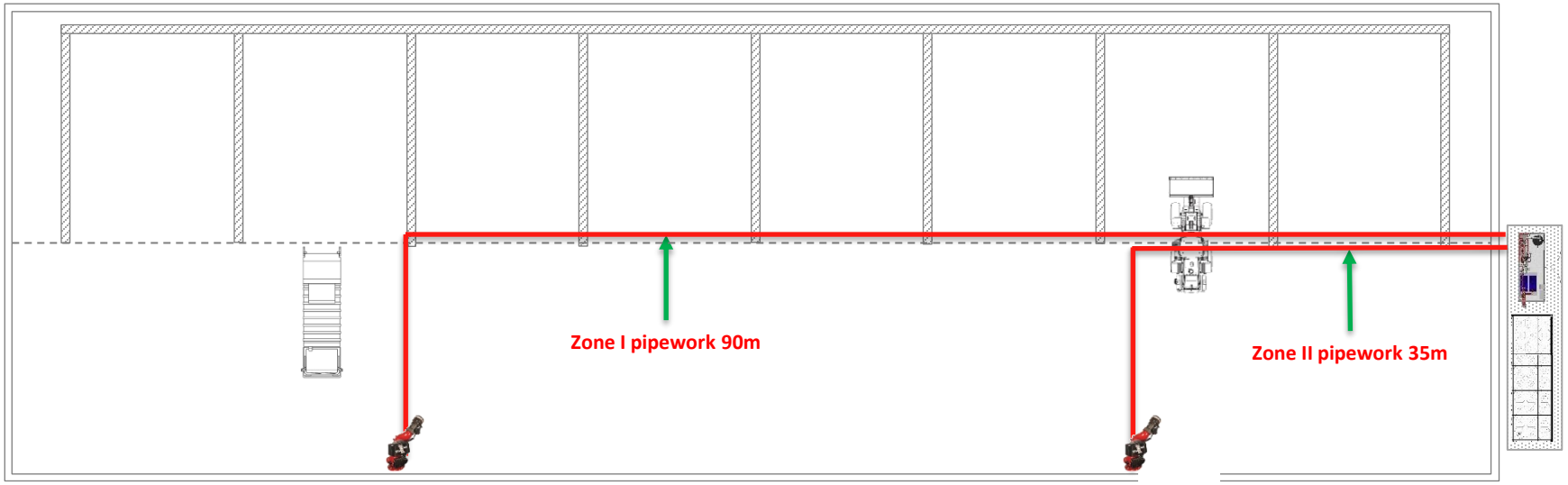
Helios A.T.F.S.® system proposed pump station location



ATFS pump station to be locate at rear of building on concrete pad. Pump station to be connected to 90,000 Ltr GRP water tank

Countrystyle Recycling (Otterpool) Two zone ATFS project

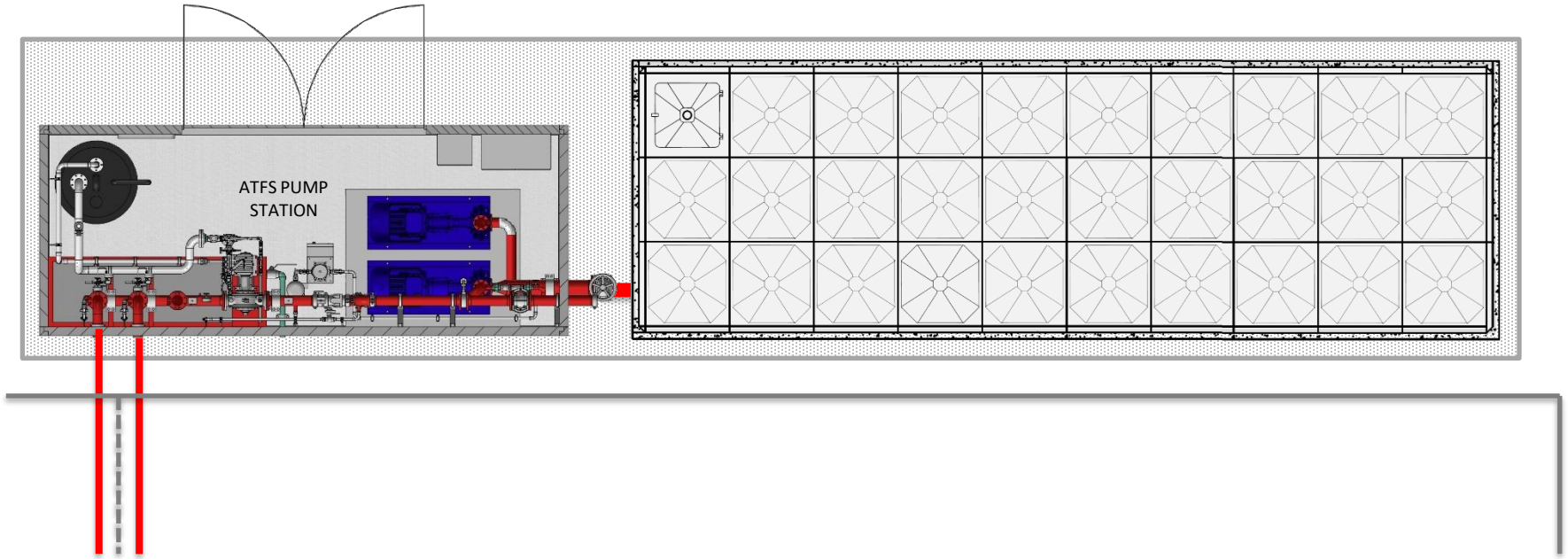
Helios A.T.F.S.® suppression system piperun plans



Total pipework required 125m (approx) including 2x 10m risers and water tank connections

Countrystyle Recycling (Otterpool) Two zone ATFS project

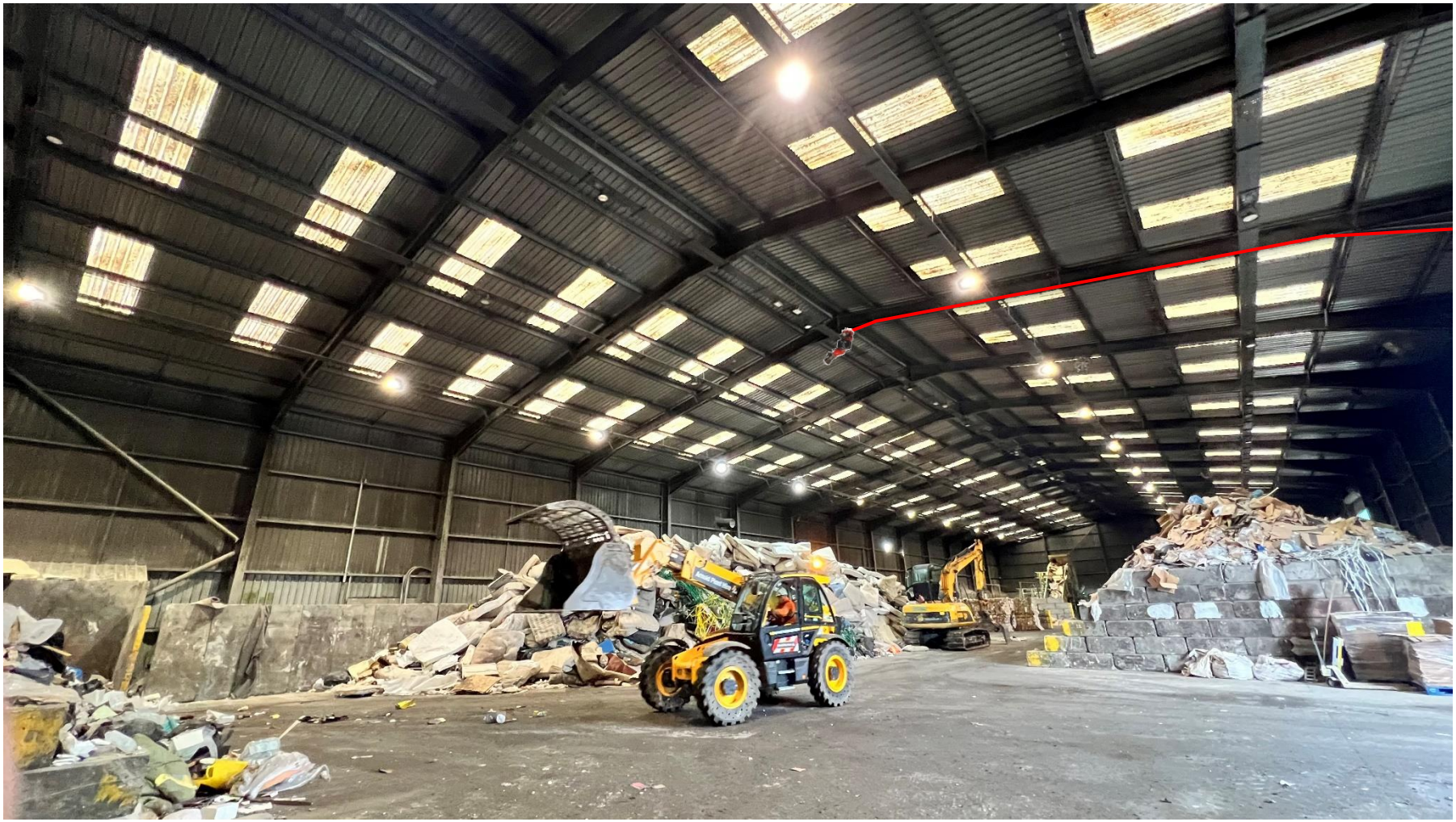
Helios A.T.F.S.® system proposed pump station pad

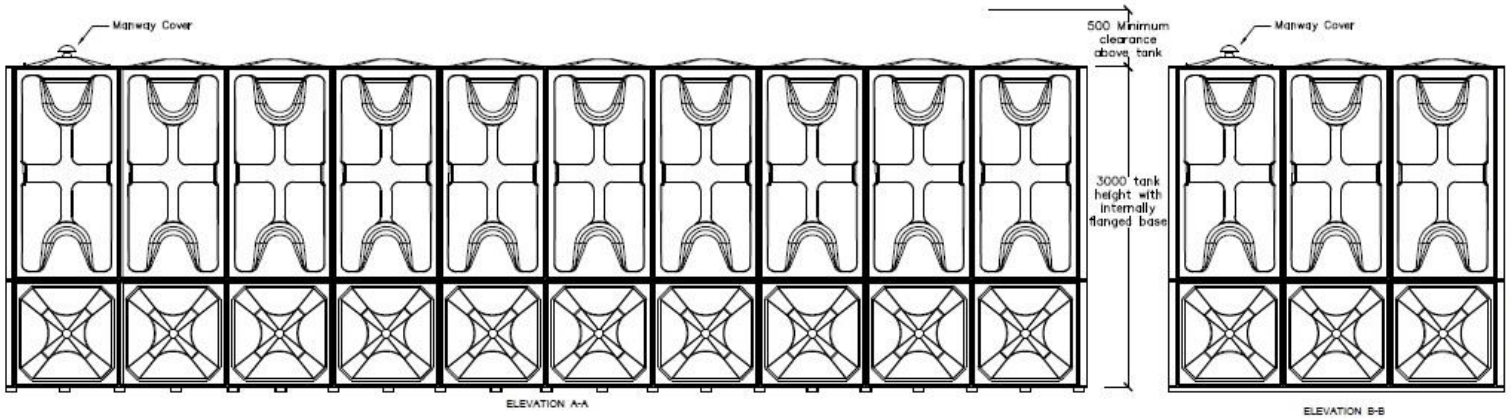


ATFS pump station to be located at side of building on concrete pad. (TBC)

Countrystyle Recycling (Otterpool) Two zone ATFS project

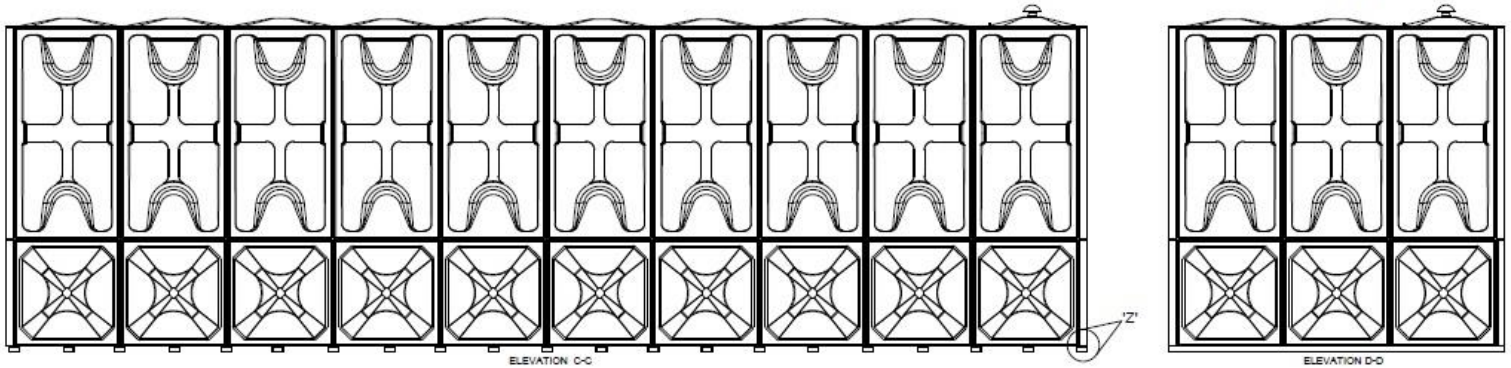
Helios A.T.F.S.® suppression system piperun (Example)





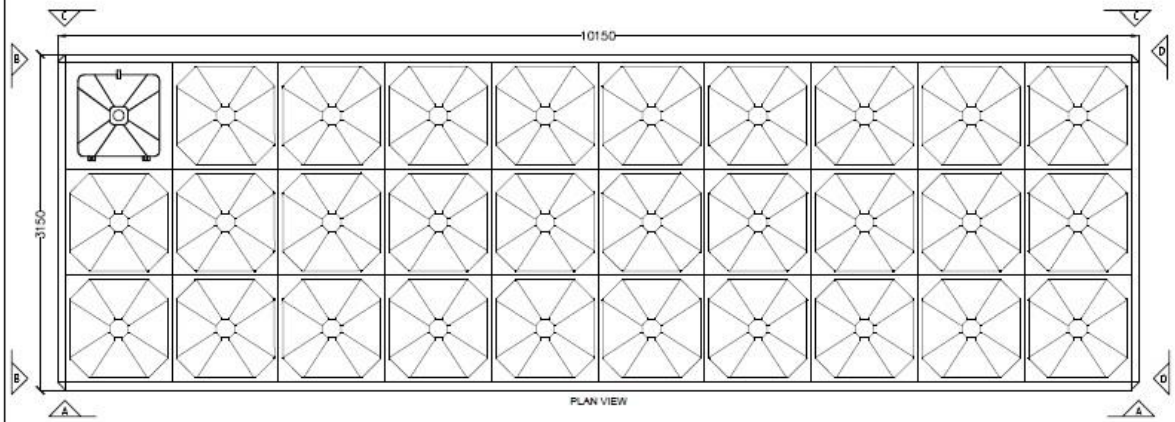
ELEVATION A-A

ELEVATION B-B

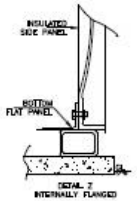


ELEVATION C-C

ELEVATION D-D



PLAN VIEW



CONNECTIONS		
Ref	Description	Qty
N1	Inlet – Fire connection point s/s @ 50mm	1
N2	PN16 return connection @ 100mm	1
N3	PN16 outlet connection @ 200mm	1
N4	BSP drain connection @ 25mm	1
N5	H/LO level switch – Roof mounted	1
N6	Contents gauge side mounted	1
N7	Immersion heater	1
N8	Test return pipe	1
N9	Drain valve @ 25mm	1

NOTE:

- Position & Size of tank connections can be altered according to customers requirements.

- All GRP sectional tank foundations are to be leveled within a tolerance of 2mm in any 1m, or a total of 6mm in any 6m, measured laterally or diagonally as per BS EN 13280:2001

- The foundation should be constructed so that when the tank is full, the combined deflections should not exceed 1/500th of the span as per BS EN 13280:2001.

- Standard ball valve chamber heights are 200mm, 300mm & 500mm. This is in addition to the tank height shown.(Other non-standard chamber sizes available upon request)

- We require 500mm min. working access around the tank walls for installation & future maintenance works, if access is not available then please contact our technical services department

- If no concrete piers or plinths are available on site we do not take responsibility for the final positioning of the tank.

- The maximum shim height of steel bases = 18mm H.

- Lead times given are commence from date of receiving signed off design drawing from client.

REV	REASON	DATE
A	DESIGN DRAWING SIGN OFF	10.02.22

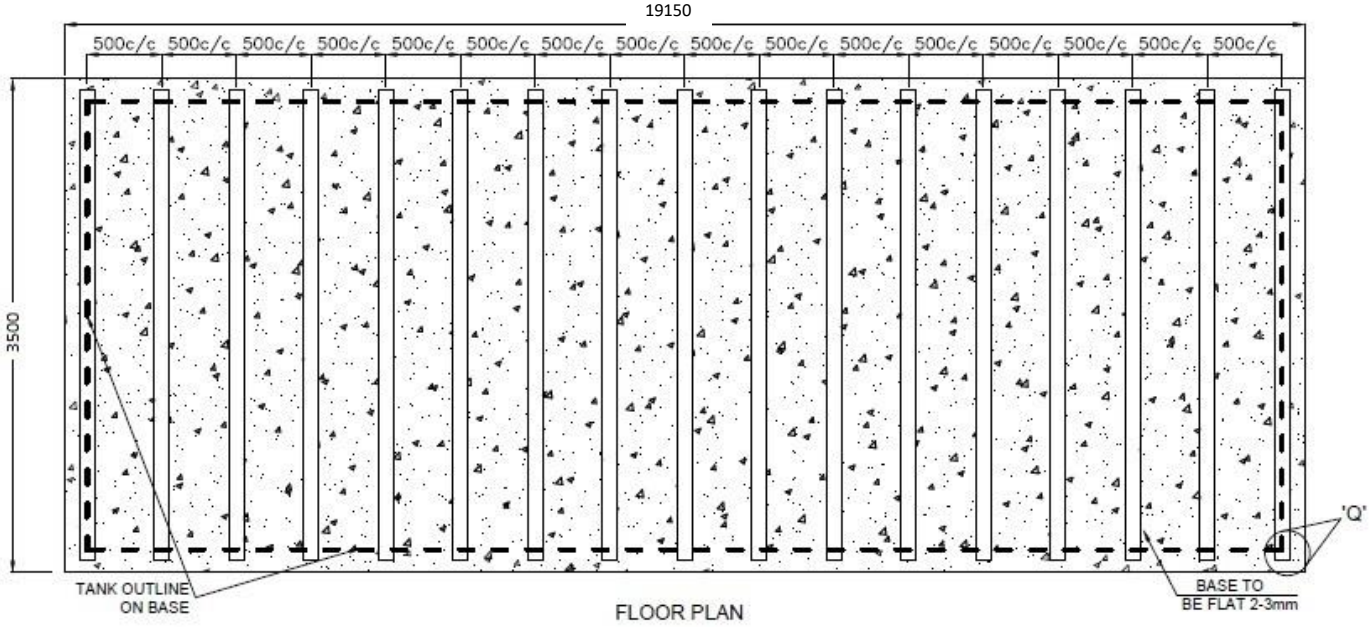
CLIENT

Countrystyle (Otterpool)

PROJECT

10000x3000x3000 IFB
UN–INSULATED

DWG No	DATE
DP2202 - 31	10.02.22
SIGN	PRINT



FLOOR PLAN

NOTE:

- Position & Size of tank connections can be altered according to customers requirements.

- All GRP sectional tank foundations are to be leveled within a tolerance of 2mm in any 1m, or a total of 6mm in any 6m, measured laterally or diagonally as per BS EN 13280:2001

- The foundation should be constructed so that when the tank is full, the combined deflections should not exceed 1/500th of the span as per BS EN 13280:2001.

- Standard ball valve chamber heights are 200mm, 300mm & 500mm. This is in addition to the tank height shown.(Other non-standard chamber sizes available upon request)

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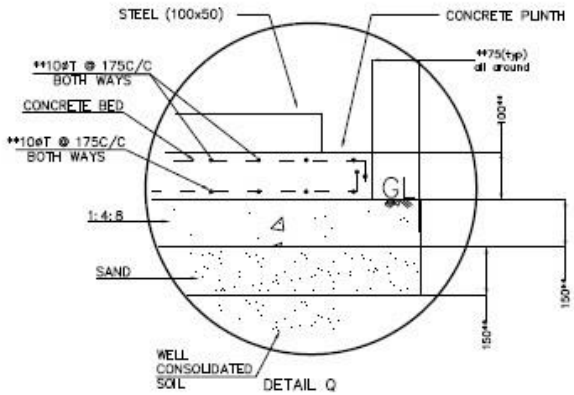


DETAIL Q

REV	REASON	DATE

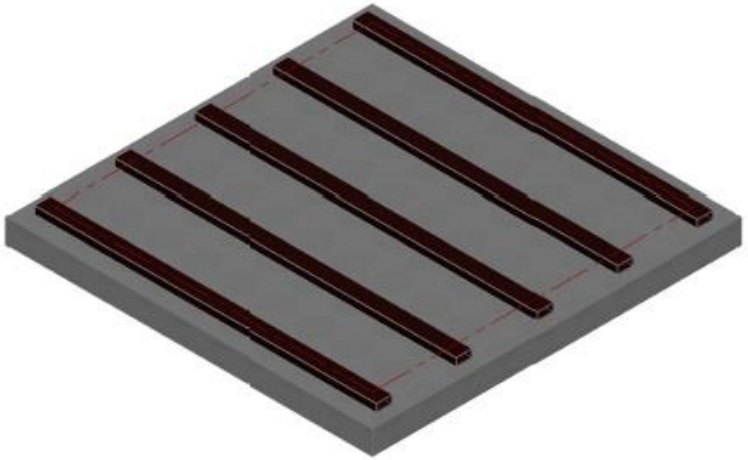
CLIENT

Countrystyle (Otterpool)

PROJECT

Otterpool
10 x 3 x 3

DWG No	DATE
—	20-05-2022
SIGN	PRINT



3D Representation

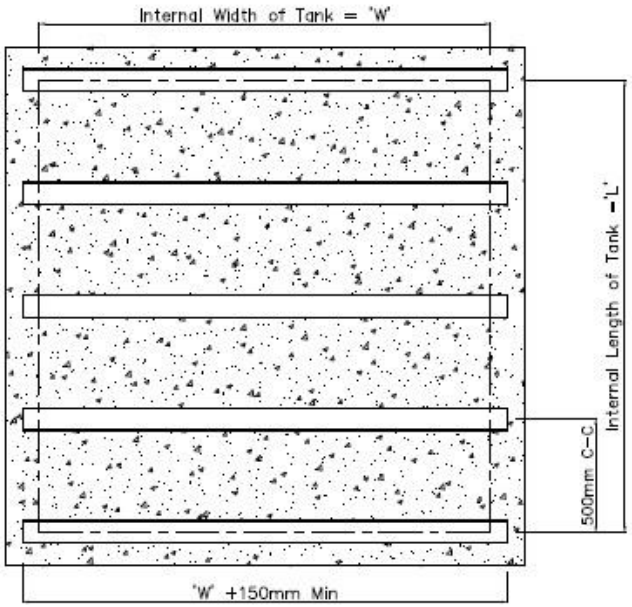
Internally Flanged Base tanks – Leveling steels notes

– Low profile steel beams are suitable for use when a tank is to utilise an inadequate existing foundation. the surface of steels shall be level, flat and free of any local irregularities.

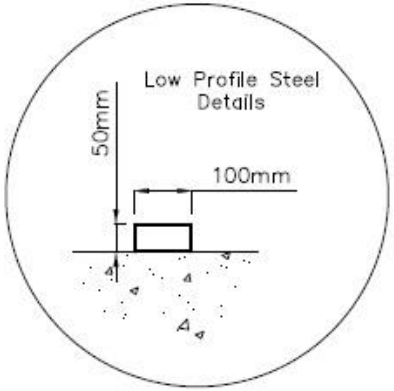
– All GRP sectional tanks are to be installed on a base level to 2mm p/m or 6mm p/6m, measured laterally or diagonally all as per BS EN–1380 2001

– Steel beams shall not deflect more than 3mm under the full weight of the tank and its contents. Within DPL's design the tank shell can be presumed to weigh 0.4 kN/m3 per panel area.

– Leveling steels shall be aligned to within ±4mm of proposed position. This tolerance is NOT accumulative. Steels may run either lengthways or widthways depending on existing site conditions & panel layout within proposed tank footprint.



Aerial View



REV	REASON	DATE

CLIENT / REFERENCE

Technical design details

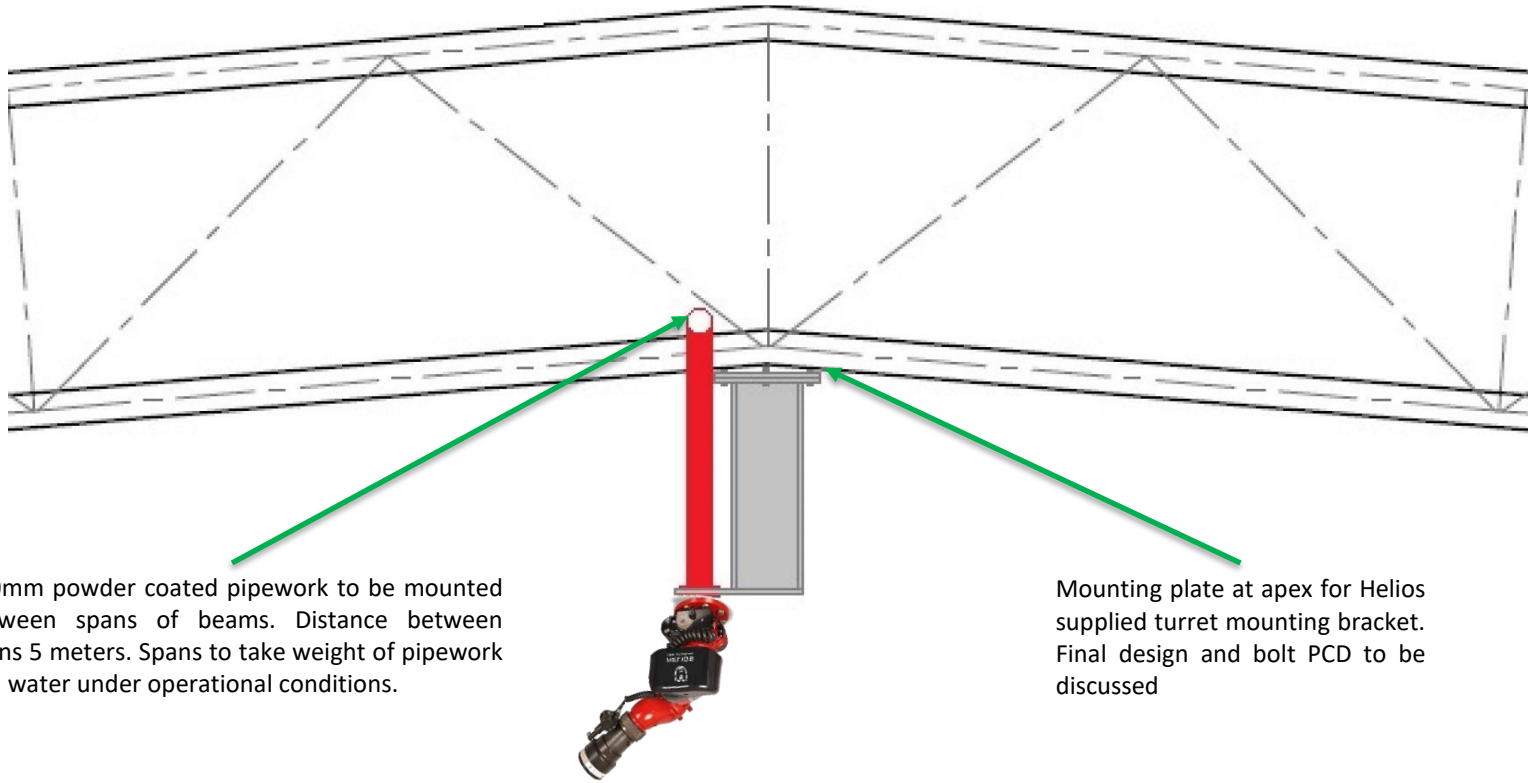
PROJECT

IFB Tank – Low profile steels details.

DWG No	DATE
DP2012100 - A	16.12.2020
SIGN	PRINT

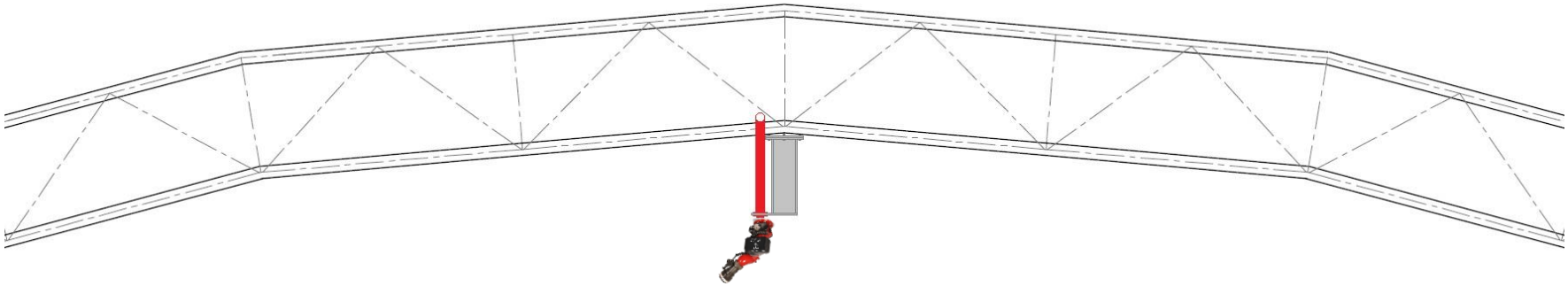
Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® Zone I Turret mounting



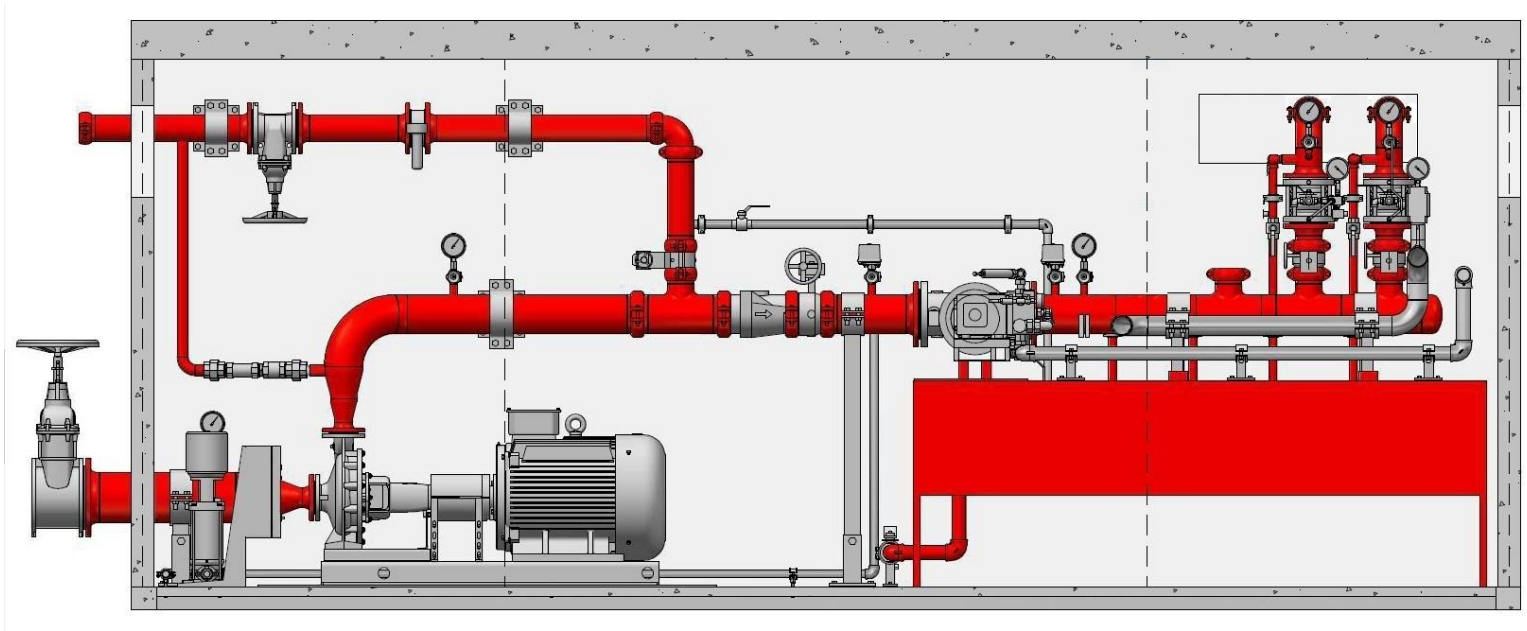
100mm powder coated pipework to be mounted between spans of beams. Distance between spans 5 meters. Spans to take weight of pipework and water under operational conditions.

Mounting plate at apex for Helios supplied turret mounting bracket. Final design and bolt PCD to be discussed



Devon county council (Brynsworthy) Two zone ATFS project

Helios A.T.F.S.® system container layout

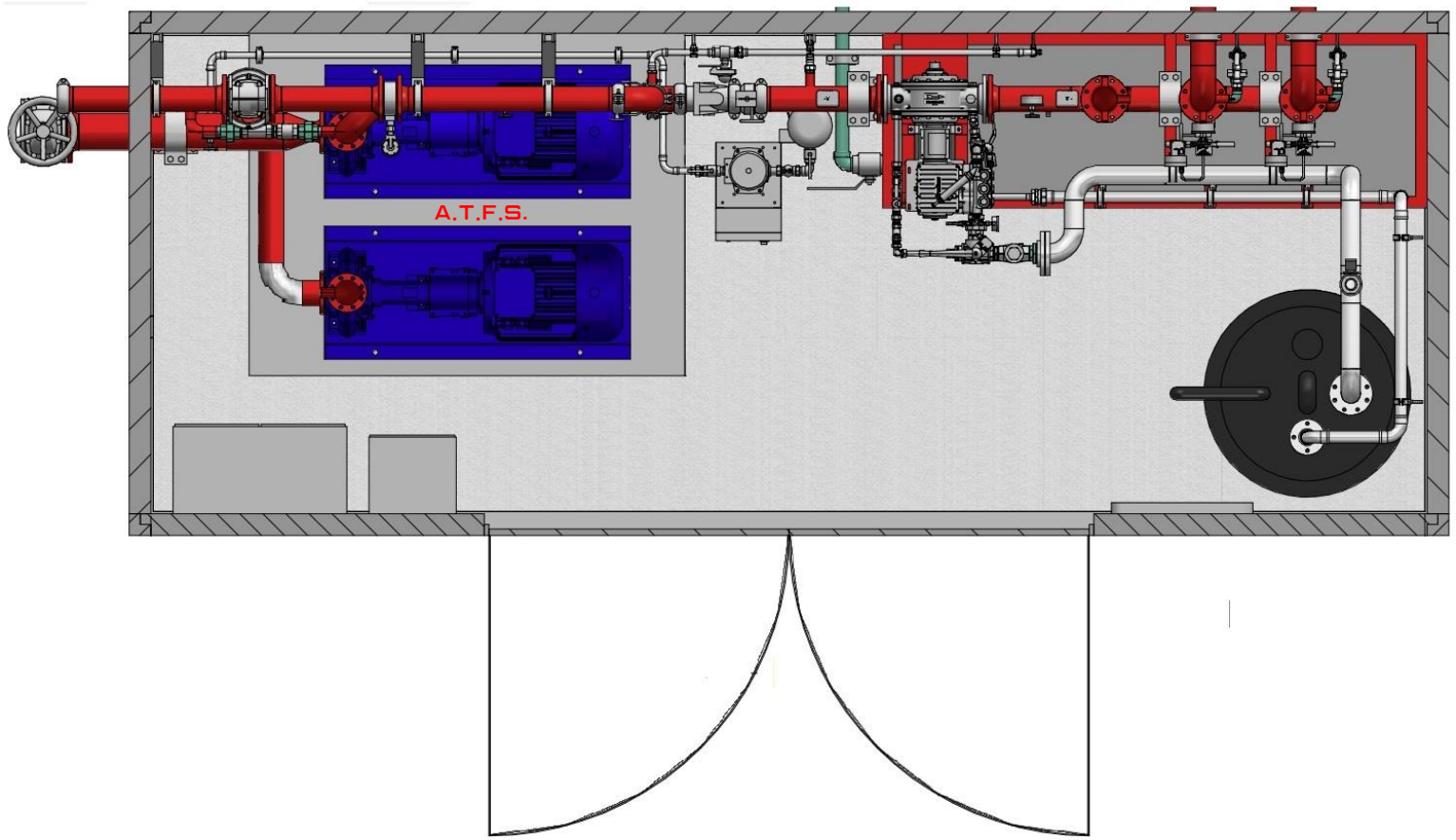


Side elevation of ATFS container (2 active and 1 future zone)

Future zone for potential use in the future. To have this capability built in now will reduce costs for any future additional zones later. There is no cost for this additional zone.

Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® system container layout 2 zone



Plan elevation of technical container
2+1 zone system with duty and standby 1500L/min pumps 80amp 3 phase

Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® System Container layout proposed

Images of technical container installation

Countrystyle Recycling (Otterpool) Two zone ATFS project

Helios A.T.F.S.® System delivery and installation

- System components are delivered ex works. A schematic drawing of the agreed system layout/structure will be supplied to you to prepare for installation. All cabling/wiring between sub-distribution, control room, CIE and the system components is by the client.
- The operating terminal shall be situated in the office building. All cabling will be done in fiber-optic cables; the required fiber-optic data converters are part of the quote.
- Under very dusty and dirty conditions, compressed air is to be supplied by the client to keep the PYROsmart® clean and functional. Alternatively, we can offer to provide a reciprocating piston compressor or air dryer.
- A skilled members of our install team will complete all containment/cabling/wiring of the PYROsmart® system.
- A suitable foundation base needs to be prepared prior to water tank being installed. A full detailed spec will be sent prior to client agreeing terms.
- It is the client's responsibility to supply a 2no 80amp and 1no 32amp electrical supply to the location of the Technical container. This is a pre-requisite and needs to be in place prior to installation of equipment.
- Once the mounting has been completed, we will commission the system and prepare it for test operation. This might take up to 2 weeks. The test operation will run for another 4 weeks.
- Remote access to the system via broadband or UMTS is a prerequisite for the commissioning of the system, and for the fast and cost-effective support of all alterations, maintenance issues or malfunctions.
- All drawings are indicative as a full site survey has not been completed. These preliminary plans are for indicative costing purposes. A full site survey will need to be carried out for both cabling and water supply for the fire suppression system.
- These drawings and proposals have been based on the visit by our Mr. Garry Adey who has assessed to the best of his ability and with limited access provided by the client. Full site/building drawings/plans will need to be provided to give full costings for the whole install this preliminary plan is used for indicative costing purposes only. Costs may change due to feasibility and accessibility in running cables and power to each point. These costs will be agreed once a site survey has been completed by our engineers. All cable and piping plans are subject to change dependent on the outcome of a full site survey.

Appendix B Emergency Contact Sheet

Contact	Phone Number
The Airport Cafe	01303 813185
Invvu Construction Consultants	01303 850808
Wraight's Mowers	07733293315
Price R and Sons	01303 813150
IKEBANA	01303 812204
PML Seafrigo UK Inland Border Hub, Kent	02088932666
Lympne Industrial Estate	01303 266864
Laser Transport Ltd	01303 260471