



EMR Group Ltd

Fire Prevention Plan

EMR BRENTFORD (NON-FERROUS)

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Fire Prevention Plan – EMR Brentford (non –ferrous)

Introduction

In line with Environment Agency (EA) Fire Prevention Plan (FPP) Guidance, this document has been generated to focus on aspects of fire prevention and appropriate fire response, and aims to facilitate the prevention of fires and for a fast and effective response in any waste fire emergency at the EMR Brentford (non-ferrous) metal recycling facility.

Fire Prevention Plan - Objectives

This document forms part of the site's Environmental Management System (EMS) held on site and intended to satisfy EA requirements as a 'standalone' and specific FPP with regards to waste activities undertaken by EMR at our Brentford (Non-ferrous) Facility. This FPP aims to meet the following objectives:

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

Where EMR fails to meet strict FPP criteria in meeting the objectives laid out above, suitable 'alternative measures' will be demonstrated with the aim of meeting these objectives (see section 1.5 below).

Section 1 – The Site

1.1 Location of Site/Community/Sensitivity

The site is situated within an industrial estate in Transport Avenue, Brentford, Middlesex (TW8 9HF) at grid reference: TQ16420 78267. The site is approx. 1.5km from the nearest residential housing. The Grand Union Canal lies north of the site directly adjacent to the northern boundary of the site (25m north).

1.2 Site Activities

Primary site activities includes the buying, processing, storage and treatment of non-ferrous metal wastes i.e. the sorting, baling, stripping, cutting, shearing, dismantling, shredding, separation, breaking and bulking of non-ferrous metals including, aluminium, copper, lead, stainless steel and the acceptance, storage and bulking of electrical cables (copper) and lead acid batteries. Wastes accepted and activities performed are as stipulated by the requirements of the site Environmental Permit (no. EPR/KP3625ST).

1.3 Layout/Infrastructure

See Site Plan in Appendix for details of layout of site as can be seen much of the site's footprint is taken up by the main non-ferrous building and most storage and site activities occur within the main building.

See Site Plan in Appendix for details.

1.4 Types of Combustible/Flammable Materials

Most types of non-ferrous metals are non-combustible (e.g. copper, lead, aluminium, brass are all non-combustible metals) but the combustible materials which are normally present on site comprise of the following: Waste Lead Acid Batteries; Cables (plastic covering); General waste (from offices and welfare facilities).

Flammable materials and substances normally present on site comprise the following: Diesel / fuel oil; Propane gas bottles; Engine oil; Hydraulic oil

1.4.1 Combustible/Flammable Waste

Combustible materials normally present at the EMR Brentford (Non-ferrous) site will comprise the following:

1. Lead Acid Batteries
2. Plastic covered copper cables (low combustibility)
3. General Waste (offices & welfare facilities)

4. Paper and Cardboard (office)
5. Wooden pallets

No flammable waste fluids are present on site (e.g. fuel from ELVs) because as a non-ferrous sites now waste material containing flammable substances is accepted on site.

1.4.2 Other Combustible/Flammable Materials

Flammable materials and substances normally present at Brentford (Non-ferrous):

1. Diesel / fuel oil
2. Propane gas bottles
3. Engine oil
4. Hydraulic oil

1.5 Alternative Measures Employed

No alternative measures will be employed

Section 2 – Preventing Fire

2.1 Pile Sizes/Volumes

Please see table 1 below

2.1.1 Preventing Fire - Table 1

(Note: NC = Non-combustible; C = Combustible; LC = Low combustibility)

Waste stream	Location (must match site plan)	How it is stored For example this may include piles, bays, containers, skips, racks, bales	Max. length / m	Max. width / m	Max. height / m	Volume / m ³	Max. time it will be stored
Copper (NC)	Building	Bays	5	5	3	75	3 months
Aluminium (NC)	Yard	Bays	10	10	4	400	3 months
Cable (copper & plastic) (LC)	Yard and building	Bays / rollonoff containers	10	10	4	400	3 months
Iron-Aluminium composite (Iron alloy) (NC)	Yard	Bays	10	10	4	400	3 months
Brass (NC)	Building	Bays	5	3	1	15	3 months
Lead (NC)	Yard	Bays	3	3	1	6	3 months

Waste stream	Location (must match site plan)	How it is stored For example this may include piles, bays, containers, skips, racks, bales	Max. length / m	Max. width / m	Max. height / m	Volume / m³	Max. time it will be stored
Lead acid batteries (C)	Building	20 x Battery bins	1.5	1	1	1.5	3 months
Stainless Steel (NC)	Yard	Bay	5	3	1	15	3 months
Zinc (C)	Yard	Bay	5	3	1	15	3 months
General waste (incl. office waste) (C)	Yard	40cu.yd rollonoff container (enclosed)	6	2.5	1	15	3 months
Wood waste (broken pallets etc.) (C)	Yard	40cu.yd rollonoff container (enclosed)	6	2.5	1	15	3 months

2.2 Waste Management Methodology

2.2.1 First In/First Out (FIFO)

All waste transactions (movements and transfers) and weights measured will be recorded via the weighbridges onto the waste data software system known as 'Trade 2'. Data will be inputted on to Trade 2 by trained personnel only, such as trained Weighbridge Operatives and Depot Managers. The Trade 2 system also acts as a real time data base to facilitate the tracking of waste, which in turn allows FIFO to be applied effectively.

2.2.2 Acceptance

All wastes accepted into the EMR Brentford non-ferrous depot will be checked that they are permitted on to the site as described in the site's environmental permit (EPR/KP3625ST) plus permit exemption requirements of S2 and T9 (as site currently only holds exemptions) and the site Environmental Management Plan (EMP - formerly Working Plan), where relevant, using waste descriptions and relevant European Waste Catalogue (EWC) code six digit codes as listed in the permits (and EMP). If a Waste Transfer Note (WTN) is available, this will be checked against the requisite detail (as outlined the relevant procedure: EPP 1.1 the Duty of Care – Acceptance of incoming material and completed on the WTN. For Hazardous Wastes incoming loads may be accompanied by Hazardous Waste Consignment Notes (HWCNs) -see Hazardous Waste section below.

[See Waste Acceptance procedures: EPP1.1 The Duty of Care – Acceptance of incoming material.

2.2.3 Inspection and Rejection of Waste Material

All incoming waste that is accepted at EMR sites will be visually checked and inspected following admittance onto the site weighbridge; visual inspection may entail either direct inspection or the use of CCTV cameras (e.g. overhead cameras).

When waste materials have been tipped / unloaded, they will be additionally checked / inspected for non-permitted 'rogue' items or waste materials (including flammable substances and ignition sources) that could contravene (breach) the permit or exemption conditions, including combustible or flammable items and materials or ignition sources (e.g. gas bottles, Li-ion batteries, aerosols). These loads will be either quarantined (for onward permitted and compliant disposal) or rejected from site. Once any problem with the quality of the load is noted, information will be passed back to the weighbridge or to a responsible person by the relevant communication system used in the yard (normally radio) and as soon as the load is checked and passed for acceptance, the load will then be transferred to the appropriate area or stockpile for processing.

Where relevant the grade and EWC code will be amended on the system/waste transfer note (WTN) if it is different to the description grade (and / or EWC code) it was weighed in as. Once this process has been completed and everything is found to be correct on the WTN / ticket the weighbridge operative will then sign the ticket. Any material found to be contrary to the environmental permit conditions (e.g. flammable aerosols or rogue gas cylinders) or exemption criteria is either rejected from site and loaded back onto the vehicle and the weighbridge or site supervisor / manager is informed of the rejection, or the waste material /item is isolated (quarantined) in a designated quarantine area and removed from site and transferred to a suitable permitted and approved waste treatment or disposal facility as appropriate.

2.2.4 Treatment

The only treatment on site comprises physical treatment, which entails the sorting and segregation of non-ferrous metals and batteries and the baling and shearing of non-ferrous metals (e.g. aluminium) as a size reduction process to facilitate bulking of the segregated materials in containers and onward transfer and export for non-ferrous metal recycling.

2.2.4 Recording Waste Movement

All waste movements and transactions are recorded electronically on the company's electronic Trade 2 weighbridge software system. Waste Returns (for inward and outward waste) are submitted to the EA for all permitted sites, this data is accessed from the Trade 2 system.

2.3 Materials/Waste Storage Management

2.3.1 Duration and Stock Rotation

Storage and rotation of scrap will be facilitated by the (real time) Trade 2 electronic waste management system, including stock level sheets, linked to the Trade 2 weighbridge system which is available for all UK EMR depots including EMR Brentford non-ferrous.

This electronic system allows for the effective stock management of waste materials on site and for logistically efficient inter-depot transfers thus facilitating fast turn -round of materials (< 72h) and keeping stock levels at reasonably low levels (i.e. within EA FPP guidelines). This strategy (and the supporting electronic software system) is also driven by EMRs' business model of fast, efficient and compliant throughput and keeping stock levels low at depots.

No scrap metals or any other waste materials will be stored any longer than 1-3 months. Waste (scrap) materials (as listed) will normally be stored for less than 1 month and will usually be processed and disposed of (recycled) and transported offsite as product (or for further processing) within 1 week. Combustible waste materials (listed in Table 1) under normal circumstances are not stored on site for longer than 72 hours and are normally exported from site within a maximum limit of one week.

If waste metal is stored longer than 3 months, or in piles greater than those specified in FPP guidance – stock rotation should be considered, unless suitable alternative measures can be demonstrated.

2.3.2 Waste Bale Storage

Only non-ferrous metal bales are stored on site (e.g. aluminium) and are therefore are non-combustible. No combustible baled wastes are stored on site.

2.3.4 Storage where maximum pile limits don't apply

No wastes of this type are accepted or stored on site (for example End of Life Vehicles are not accepted at the Brentford non-ferrous site).

2.3.5 Waste Stored in Containers (Types/Accessibility/Ability to move)

Batteries are stored in plastic battery bins on site (stackable with fork lift groves at base).

General waste and office waste is stored in a 40 cubic yard enclosed rollonoff containers. Wood waste (mainly broken pallets) is also stored in a separate 40cubic yard container.

2.4 Managing Common Causes of Fire

How the business manages common causes of fire is listed in the table 2 below

If any don't apply – simply state this and don't ignore the requirement.

2.4.1 Managing and Controlling Causes of Fire - Table 2

The management, prevention and control of common causes of fire are outlined below.

Managing Common Causes of Fire	
Risk	Control Measure (if required)
Arson	24 hour manned CCTV (MITIE)
Plant/Equipment /small office waste or items.	Fire extinguishers, hoses, monitors and requisite equipment (e.g. mobile plant) in vicinity of most operational and non-operational areas.
Electrical Fault/Maintenance	Fire / heat sensors in buildings containing electrical equipment. Electrical equipment is tested and maintained on regular basis by competent persons (RCD testing, PAT Testing, fixed wire testing etc.)
Smoking Policy	Smoking only permitted in single designated smoking area (external shelter).
Hot Works	Permit- to –work (PTW) raised for most hot works (also fire extinguisher /water made available near-by.
Industrial Heaters	None on site (not permitted on any EMR sites)
Hot Exhausts	Concealed and never in contact or near flammable / combustible materials
Batteries	Kept in bin containers areas under cover in building away from ignition sources and other flammable / combustible materials
Leaks & Spillages	Spill sorb applied to spills and cleared immediately
Build-up of Loose Combustible Materials	No combustible materials are stored loose in any appreciable volumes (<6m ³) therefore minimal firefighting capacity is required. Most materials on site comprise of non-combustible or low combustible non-ferrous metals (e.g. copper, brass, aluminium, lead, stainless steel). More combustible, ferrous metals (e.g. ELVs) are not accepted on site.
Reactions between Wastes	No reactive wastes stored on site but with regard to small chemical containers and gas cylinders oxidisers are stored separately from hydrocarbon gases, solvents etc. (i.e. chemical smalls in lockable, steel yellow cabinet, with warning signs displayed).
WEEE Wastes	WEEE wastes are combustible and common producers of ignition sources (e.g. lithium ion batteries). WEEE wastes are also common causes of fires at metal recycling sites. The Brentford (non-ferrous) site does not accept WEEE wastes (of any type) and such wastes are rejected at the weighbridge when encountered.
Hot Loads	N/a
Heat & Spark Protection	Electrical earthing will be installed where applicable; no other ignition sources are normally present on site apart from ad-hoc maintenance welding and oxy- propane cutting (Permit-to-Work is employed where appropriate).
Gas Bottles & Other Flammables	Stored upright in cages and chained (away from ignition sources, other flammable / combustible materials and oxidisers. i.e. min. 6m separation distances)

Smoke/Heat/Flame Detectors	Installed in high risk areas of site (e.g. occupied buildings)
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2.5 Detection Systems

The site possesses 24 hour remotely manned CCTV (contracted provider: MITIE) and thermal imaging cameras.

During normal operational hours the site is also monitored at least twice daily (for any smouldering, ignition sources, housekeeping etc.) by the site manager / supervisor and this recorded in the site diary.

If any maintenance burning (oxy-propane cutting) or welding activities are taking place on site, this is monitored frequently and if it is a high risk activity (e.g. burning activities close to flammable materials) then a Permit-to-Work (PTW) is raised and issued by a competent, authorised person and appropriate actions and safe-guards are taken.

EMR use one of two types of thermal cameras and at the Brentford non-ferrous site the one installed is the Q1941 which operates by detection by variation of pixel count.

The Q1941 detects on pixel count it on movement in the detection area – IE person, tree blowing , white bag blowing across the site scrap moving. On alert the alarm is send to the external monitoring station for them to act on. All EMR IP cameras used are made by Axis.

In addition, MITIE (Contractor) actively monitor the site (CCTV) out of hours, originally employed to identify intruders they are now also used to visually detect fires, which they report to authorised /designated person (s) (usually depot manager on their mobile phone, followed by next person on list if unobtainable – see internal contact on Emergency plan).

Sequence of actions following detection:

- MITIE once they have detected the fire will contact list of individuals shown on Emergency Plan (see attached showing named individuals and mobile telephone numbers).
- The first contact to respond will immediately make their way to the site
- Authorised (AP) will isolate the site (electricity) as shown in EP, if relevant and required.
- AP will assess the fire and obtain penstock key from the office (if safe to do so) and confirm to MITIE that they have arrived on site
- AP will close the penstock valve and contact emergency services (FRS) and the EMR area manager plus next nearest site staff
- AP will wait for assistance from additional site staff and attempt to fight the fire (if safe to do so) according to EMR fire safety procedures until the FRS arrive and they will then relinquish control to the FRS commander.

Smoke alarms (Category 3) will also be installed in main office/ weighbridge office buildings.

The level of detection system is appropriate for the type of facility, in particular the non- combustibility or low-combustibility of the materials stored on site. The fire detection systems implemented have been designed to ensure that the three main aims of the EA's FPP guidance are met; namely minimise the likelihood of a fire happening, aim for a fire to be extinguished within four hours, and minimise the spread of fire within the site and to neighbouring sites.

2.6 Demonstrating Quality of Stock

Strict waste acceptance, inspection and rejection procedures ensure quality of stock (with removal of prohibited items or rejection / quarantining of contaminated loads. Additionally EMR export facilities possess ISO9001 EoW

(End of Waste) quality management systems (e.g. EMR Tilbury Dock), which is a significant driver to ensuring metal grades meet minimum quality standards (e.g. requirement for at least < 2 % contamination in many scrap metal product grades) and therefore reducing concentrations of any combustible matter within metal materials / products.

Section 3 – Preventing Spread/Limiting Impact of Fire

This section is to demonstrate that the company can limit the impact/spread of any fire (should it happen), and that it aims to extinguish any fire within 4 hours.

3.1 Separation distances

Separation distances between piles of combustible scrap metal will be a minimum of six metres, limiting the spread of any fire, which will also allow for the emergency services to access any fire and for the site to move materials in and out of the designated quarantine area as and when required. Combustible waste metals will also be separated from other combustible metal, flammable materials (e.g. gas cylinders) and parked or stationary mobile plant by a minimum of 6 metres.

3.2 Use of Fire Walls

Fire walls will be used as an alternative to separation distances when feasible (for example the walls of the building).

3.3 Storage of Waste in Bays

Fire walls will also be used as part of storage bay infrastructure (as shown on site plan) for combustible metal wastes, and where separate piles can be stored without the need for any separation distance. Consideration will be given for available 'freeboard' space between the top of the pile and that of the bay walls, to prevent fire spread through flying sparks and hot embers by leaving a serviceable gap at the top of the pile below the height of the bay walls.

Bays walls on site will be comprised of steel plate, 6mm thick and 2m high and of various lengths and will act as 'Fire walls' (see MCRMA Technical Paper no. 7). Waste / scrap materials stored in bays at the Brentford site are mainly non-ferrous scrap materials which are non-combustible materials (excepting zinc); no combustible ferrous waste materials will be accepted and stored at the Brentford site. Combustible waste materials on site will normally be either stored in dedicated bays (e.g. zinc) or in bins (e.g. paper and cardboard).

3.4 Use of Suppression Systems

Suppression systems will be used as an 'active firefighting' (refer to section 3.5) measure to assist the Fire Rescue Service and their appliances.

3.4.1 Building Suppression and Other Site Suppression Systems on site

For the type of waste activities employed on site and in the main building a suitable fire suppression system will be in place the EMR Brentford site, which will ensure the integrity of the building in any incident and prevent spread to neighbouring property etc. the suppression comprises a combination of fire extinguishers at strategic locations (see site plan), fire hoses and water sprays.

3.4.3 Third Party Certification (UKAS Accreditation)

- Not applicable (no automated systems)

3.5 Active Firefighting

All operatives receive basic fire-fighting training. Fire-fighting equipment such as fire extinguishers, monitors and hoses are located in strategic areas of the site (see site plan).

Appropriate equipment (hoses / monitors) are strategically located to assist in any fire-fighting required anywhere on site. A quarantine area is also available if materials are required to be moved to this location (see also relevant EPPs and site Emergency Plan)

3.5.1 Quarantine Area

All sealed canisters or other rogue ignition / flammable sources (identified either during the weighbridge inspection, during tipping, or during the opening of a bale), will be removed and quarantined in the lockable rogue gas cylinder cage (if a rogue gas cylinder identified) to await collection by an approved contractor. The sealed canisters are traced back to the customer, and the customer is contacted and fined the appropriate amount (normally £200 for the first offence, leading up to a maximum of £1000 and /or ban from site).

In the rare event of any larger unauthorised wastes inadvertently being accepted on site, an area of the site would be quarantined/cordoned off until the material can be assessed and appropriately disposed of and EMR staff would be notified of the quarantined material. The size of the site is not large enough to accommodate more than one quarantine area, it may not always be fixed in the same location

3.5.2 Hot Loads

EMR never accepts hot loads (e.g. from foundries) at any of its sites in the UK; if a hot load was to arrive at the site it would be immediately rejected at the weighbridge.

3.6 Water Supplies

3.6.1 Availability of Water

Normally there will be sufficient amount of water available for the relatively small quantities of combustible waste material present on site.

The water provision available to site for staff and fire-fighting comprises:

- 1) 1 x 10,000L water tank
- 2) 5 x 1000L IBCs (top cut off) containing water (temporary cover) – to be used as ‘water bombs’ dropped on burning stockpiles -externally only.
- 3) 1 x hydrant (limitless water supply)
- 4) Grand Union Canal (<25m from site boundary) – limitless water supply.

3.6.2 Water Availability - Table 3:

Maximum pile volume in cubic metres		Water supply needed in litres per minute	Overall water supply needed over 3 hours in litres	Total water available on site in litres
8m ³		53.36	9600	1 x 20,000 litre tank 5 x 1000L IBCs 1 x hydrant (limitless water supply) Grand Union Canal (<25m from site – limitless water supply)

The site will be equipped with 5 x (1000L) opened topped IBCs filled with water which, in the event of a fire, will be hoisted by the grab cranes (on site) and dropped on to any scrap heaps on fire (one by one and only if safe to do so and under direction of a competent person or the FRS where relevant) and these water deluges or ‘water bombs’ will provide an instant large volume of water to aid the extinguishing of the fire - especially in the early stages (note: just the water will be tipped in the event of a fire - as top of IBC is cut off, the water deluge will be almost instantaneous and the IBC will then be immediately removed by grab crane when empty).

The IBCs will be clearly labelled and stored in strategic locations (and covered to prevent ingress of debris); a loose lid is normally placed on top of each to facilitate the deluge, when needed in an emergency.

3.6.3 Managing Firewater (Containment)

Fire water would be contained either within the building or the external concrete impermeable surface of the site, volumes are likely to be low (as volumes of combustible materials are low at the non-ferrous metal site). Any fire water will also be contained within the interceptor as well as on site. Following a major fire, an approved vacuum tanker contractor would be employed to empty the interceptor and dispose of the fire water at an approved and permitted site. Once this is completed surface water runoff

3.7 Notifying Stakeholders

The notification of stakeholders (both internal and external) is detailed in the accompanying Emergency Plan.

3.8 Contingency Planning

In the event of a serious fire and the site needed to close for whatever reason, there are other alternative EMR depots available nearby within the area that non-ferrous metals can be diverted to at short notice:

1. EMR Brentford (ferrous)
2. EMR Willesden (ferrous metal and fragmentiser site)
3. EMR Mitcham (non-ferrous & ferrous metals / shear site)
4. EMR Wandsworth (non-ferrous & ferrous metals / shear site)
5. EMR Neasden (non-ferrous & ferrous metals)

3.8.1 Clearance & Decontamination

Immediately following a fire incident on site, fire water used in fighting the fire will subsequently generate significant quantities of potentially polluting, contaminated water. This will initially flow towards the nearest drains, through underground pipework and ultimately into the full retention interceptor, discharge to sewer will be prevented until this contaminated fire water is cleared and disposed of.

Once the fire has been extinguished, arrangements will be immediately made to dispose of any fire water to an authorised and permitted waste facility as soon as practicable. EMR as a company, employs only approved and permitted contractors to treat and dispose of waste and waste effluent from its sites. Approved Contractors will be used to provide road tankers to suck / remove fire water for offsite treatment and disposal at a permitted treatment and disposal facility.

3.8.2 Becoming Operational

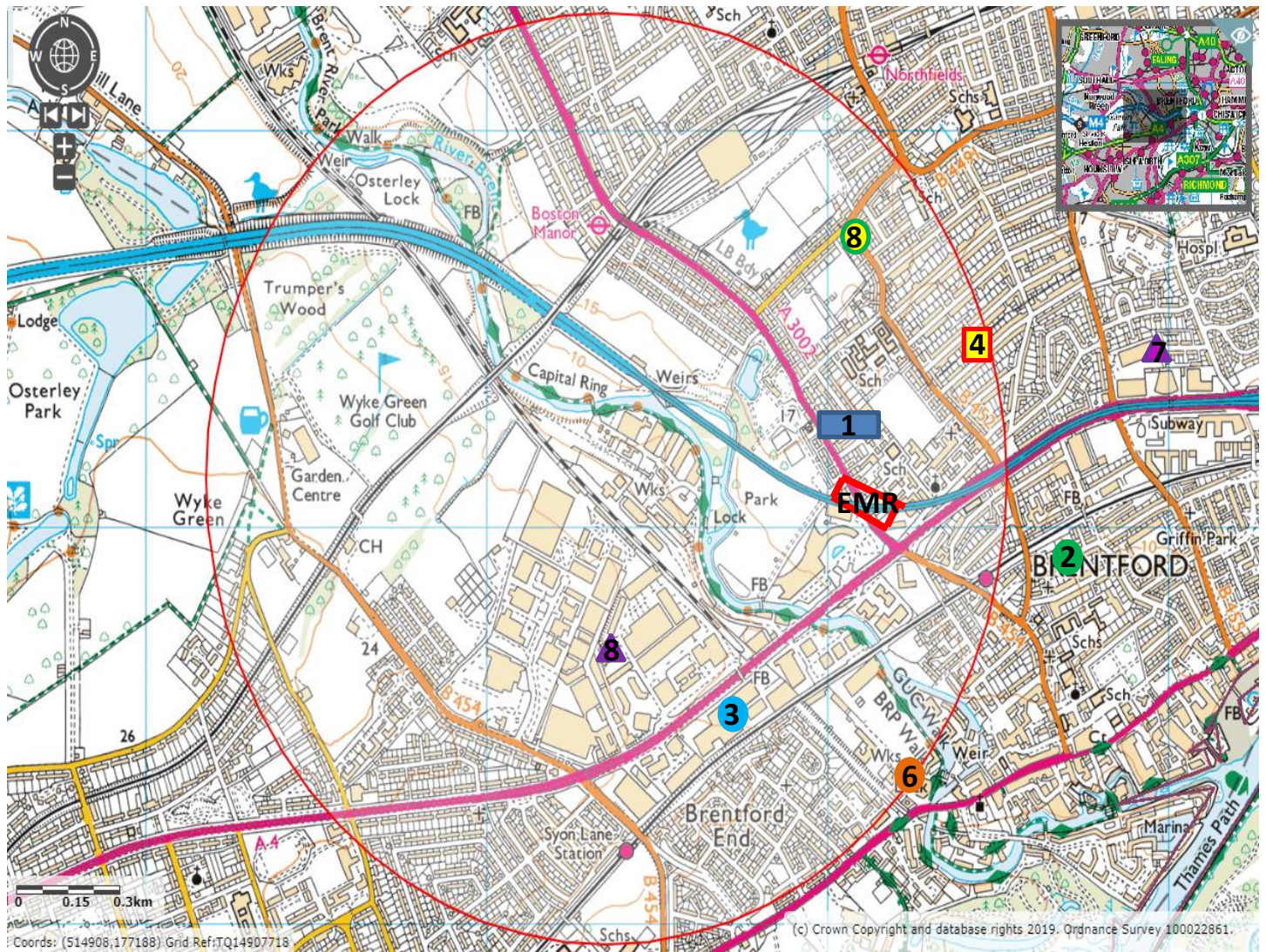
The disposal of burnt material / waste will largely depend on the waste / scrap itself and the levels of combustion that has occurred; for example partially combusted light iron or steel can waste (in feed) once fully extinguished and cooled will be transferred to an EMR shredder site for further processing in a fragmentiser (as it will largely consist of the remaining residual metals). Other waste materials produced following a fire (e.g. combusted organic / wood waste) would need to be characterised and classified under WM3 guidance document and assessed (WAC tested) to ascertain its suitability for landfill (or treatment) and then transferred to (the approved and permitted) waste facility for treatment or disposal. An approved and permitted landfill site will be used to dispose of any waste materials generated by the fire compliantly.

Operations will not continue until the site has been fully contaminated and assessed as fit for purpose, both operationally and in achieving full FPP guidance.

Other EMR sites will be available to divert incoming scrap / waste materials in the Event of a fire (or other emergency) and details of these sites are provided in the contingency plan outlined above.

Following any environmental incident including fires, details of the event will be recorded and reported on an Event log and on EMR's electronic SHE management system. This Event log or electronic reporting system will facilitate any investigation and details recorded (including sequence of events, size and extent of fire, damage sustained - internally and externally), the investigation report and actions taken recorded are all recorded on the Event log

Appendix 1 – Sensitive Receptors



- River Brent (1)
- Boston Manor Park (2)
- Train Stations: Brentford (8) and Boston Manor (5)
- Schools: Gunnorsbury Catholic School (7) and Nishkam School West London (8)
- Supermarket (3)
- Hospital (6)
- Boston Manor Road (residential housing) (4)

Figure 1.1: Nearby Sensitive Receptors (1Km radius)

Appendix 2 – Windrose

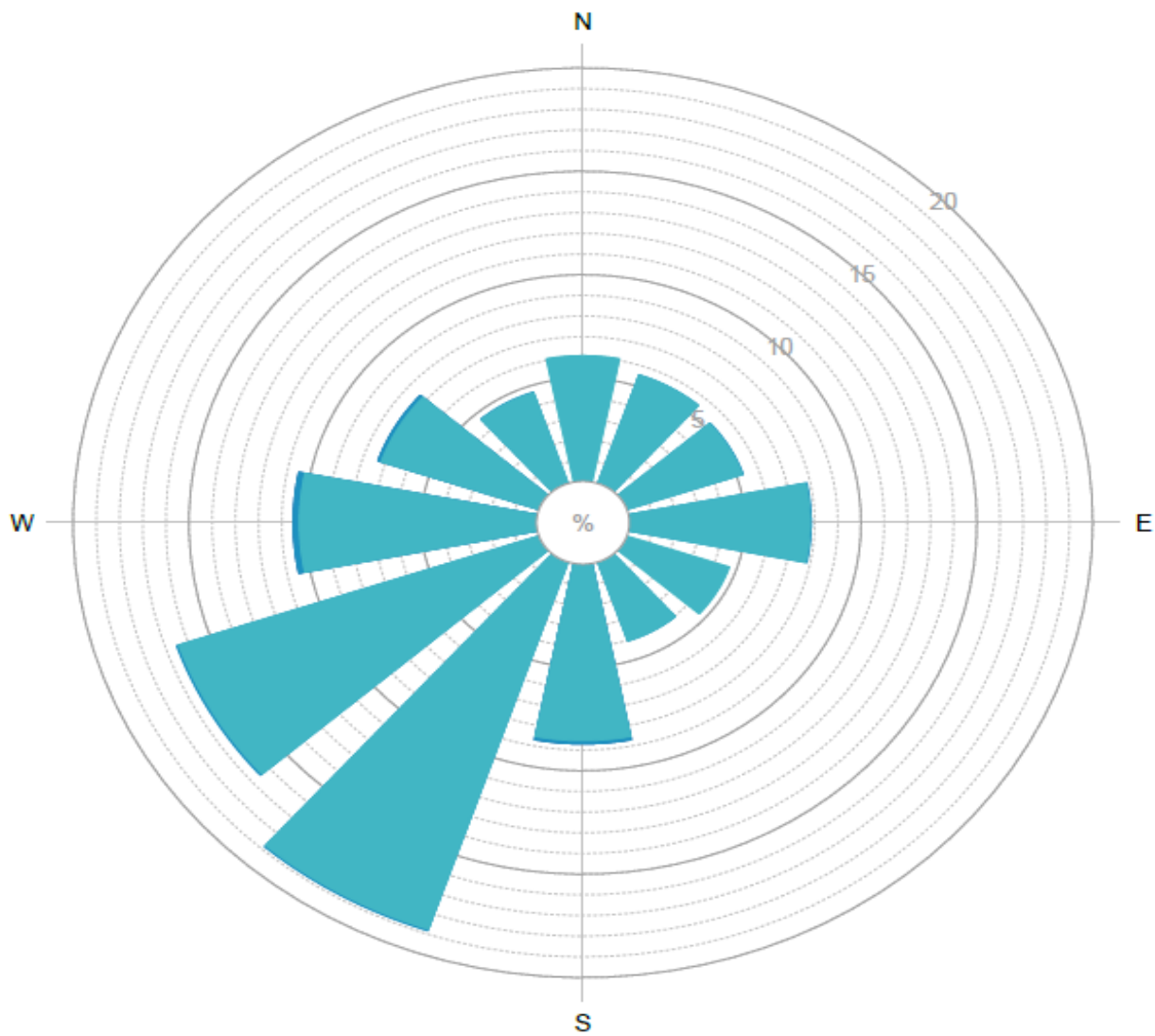


Met Office

HOURLY MEAN WIND ROSE FOR
KEW GARDENS

NGR: 5185 E 1773 N
SEASON: ANNUAL

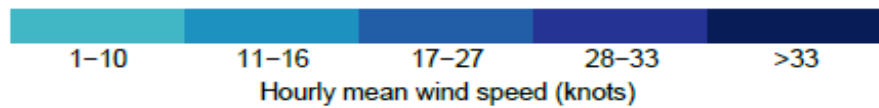
ALTITUDE: 6 metres AMSL
Period of data: Jan 2009 – Dec 2018



83,162 OBSERVATIONS

0.9% CALM

0.0% VARIABLE



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Appendix 3 – Site Plan

