EMR Group Ltd

Fire Prevention Plan

EMR Darlaston Fridge Plant – Version 01

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5/17/2022

Fire Prevention Plan Contents

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.

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 Darlaston. 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).

Key supporting internal fire policies & procedures

EMR have produced a Fire Policy. The purpose of this procedure is to define the process by which EMR manages the risk of fire, to reduce the likelihood of fire, and to prevent injury to persons and harm to the environment should a fire occur.

Section 1 – The Site

1.1 Location of Site/Community/Sensitivity

The EMR Darlaston complex is situated in a mixed industrial/residential area of Darlaston. For site location information please refer to Appendix 3. The site is bounded on the South West by the Walsall Canal, on the North East by the railway line, nearest residential estate and an industrial estate. On the South East & North West the complex is bounded by light industry. The site is accessed from Heath Road as well as Bentley Road South. The adjacent ferrous yard is subject to a separate Fire Prevention Plan.

The nearest listed building is a canal bridge over the Walsall Canal and is approximately 550m to the east of the ferrous yard. Other listed buildings within 1km of the ferrous yard are shown on the Sensitive Receptors drawing at Appendix 3. There are no or European designated sites of special nature conservation interest and no Sites of Special Scientific Interest (SSSI) or source protection zones or private water abstractions within 1km of the ferrous yard. Groundwater vulnerability is shown on the drawing at Appendix 4.

Potential environmental impacts from any fire related incident on the site may include:

- **Black or white smoke** (dependent on type of material burning) – smoke is harmful and potentially highly polluting to local air quality (especially black smoke which may contain harmful and toxic substances such as carbon monoxide, dioxins, cyanides, hydrocarbons, PAHs etc.)
- **Steam** (as water is applied) – steam potentially may obscure vision.
- **Ash/airborne debris** – risk of harm to amenity (potentially be deposited on cars / in homes.
- **Hot embers** – risk of fire spread
- **Pops/explosions** – disturbance of nearby sensitive receptors
- **Fire water** – potentially highly polluting to local water courses.

Knowledge of weather conditions and wind direction will be crucial in managing and mitigating air borne emissions such as smoke. Therefore, to enable general weather, wind direction and strength to be understood it will be recorded on the site diary/log.

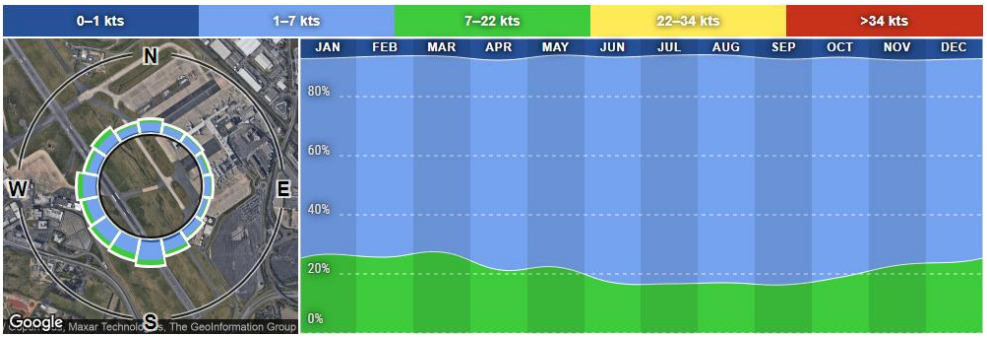
The daily weather reports will thus be able to assist EMR staff and the Emergency Services to manage and control harmful airborne emissions

A sensitive receptor map is located in Appendix 3 for reference.

1.1.1 Wind Rose – Local Weather Station: Birmingham Airport

Data on prevailing wind at this location will be suitable for use when assessing wind conditions at EMR Darlaston. The weather station is considered to reflect wind conditions at EMR Darlaston as there are no major topographical differences or barriers between the two sites.

Prevailing wind: West South West based on data recorded between April 2005 and July 2021



Source: Windfinder.com (https://www.windfinder.com/windstatistics/birmingham)

1.2 Site Activities

The activities on site consist of storing and processing of waste electronic and electrical equipment (WEEE) including fridges. The site will not make use of the metal recycling activity in the permit in the immediate future. Should the non-ferrous compound be re-instated, this FPP among other IMS documents will be reviewed to reflect this.

1.3 Layout/Infrastructure

EMR Darlaston is a complex of waste management facilities which is operated as three separately managed yards of which the fridge plant is one. The location of key infrastructure and waste treatment equipment is shown on the layout drawing included with this plan (Appendix 1). The site is largely surfaced with concrete and bounded at most of the perimeter with earth bunding. The boundary with Heath Road has palisade fencing installed along it. There are only two access/ egress points at the perimeter of the yard: one along Bentley Road South and the other at Heath Road across the canal.

Concreted areas of the site are laid in such a manner as to direct potentially contaminated surface waters to silt traps installed within the concrete. These, in turn, drain to a full retention interceptor fitted with a penstock valve located on the pedestrian path to the weighbridge discharging into Walsall Canal. Consent to discharge forms part of permit EPR/ GP3292FT.

Oil collected in the interceptor/ bypass system is removed on a periodic basis by an authorised waste contractor.

The drainage system is inspected on a regularly to ensure that it remains in good working condition, impervious and free from cracks. The results of the inspections are recorded. Any action required to be taken will be recorded. Repairs to lids and covers will be undertaken as soon as practicable and within 10 working days of discovery.

1.4 Types of Combustible/Flammable Materials

'Combustibles' do not include flammable substances such as diesel and gas which are identified on the site plan in Appendix 1.

1.4.1 Combustible/Flammable Waste

All combustible/ flammable wastes and materials listed below are identified on the site plan in Appendix 1.

The main combustible waste on site are fridges. The site will also store residual wastes from the process which are considered combustible. These are mainly plastics and foam.

The wood stored is mainly generated on site and is stored in a hook lift bin easily moveable and located according to need. Usually the hook lift bin for wood is stored by the maintenance area.

There are 2 wood and general waste roll on/roll off bins located near the maintenance area. Reusable pallets are stored on the yard ready to use for sending out tyres for recycling or to return directly to the customer.

1.4.2 Other Combustible and Flammable Materials

These wastes and materials included below are shown on the drawing included at Appendix 1.

Gases used in the hot cutting ('burning') of metal are stored in minimal quantities required for the task (propane and oxygen banks) in the area reserved for the process near to the fridge plant. Supplies are stored in the maintenance area in individual cages (banks).

Are you keeping the LPG tank?

1.5 Alternative Measures Employed

This management plan is proposing to operate outside of the FPP guidance in two areas and as such we are proposing the following alternative measures.

1.5.1 Alternative Measure (Water Supply)

The water availability on site falls short of the expected 2000L/min for a minimum of 3 hours however we have implemented the following –

- Robust waste acceptance procedures ensuring that only fridges are accepted. In the unlikely event that prohibited items are discovered during the waste acceptance process they will be segregated and quarantined.
- Early detection of fire by vigilant and trained staff will result in wastes quickly being moved into the quarantine area nearby. This will result in less waste on fire and therefore less water needed.
- The fireproof bays and 1m headspace will prevent the fire from spreading again resulting in less waste on fire.
- The nearest fire service is 10 minutes away and once on site they will make use of the unlimited water available in the canal on our boundary.
- In agreement/approval with the FRS – EMR will actively seek to recycle any fire water on site. This would both aid the reduction of water required on site in the first instance, while also reducing any capacity requirements in the need to retain fire water run-off for later off-site treatment/disposal.

Section 2 – Preventing Fire

All scrap material / wastes received into the site are subject to strict waste acceptance, inspections and rejection procedures which form part of the site's Environmental Management System (EMS); any waste which is non-compliant will be either rejected or quarantined pending disposal or further advice.

2.1 Pile Sizes/Volumes

Also refer to section 2.3 for further specific detail (refer to Table 1).

2.1.1 Preventing Fire - Table 1

1.2.1.4 Fire Prevention Plan

Waste stream	Location	How it is stored	Max. length of m	Max. width of m	Max. height of m	Volume m^3	Max. time it will be stored
Fridges	See site plan	Stacked in bays	22	7	3.5	420	1 month
Plastics	See site plan	Bulk bags in a bay	10	12	4	288	1 month
Fridge Foam	See site plan	Bulk bags or bay	10	12	4	288	1 month
Waste Oil	See site plan	Tank	2.3	1.84	1.84	5000L	3 months
Wood	See site plan	RORO	5.791	2.185	2.435	30.81	3 months
General waste	See site plan	RORO	5.791	2.185	2.435	30.81	1 month

2.2 Waste Management Methodology

2.2.1 First In/First Out (FIFO)

The 'first in first out' procedure will be followed for any material that is going to be processed on-site; ensuring stockpiles of historic material do not build up – When material arrives, the Weighbridge Operative directs vehicles to the appropriate tipping area at the back of the relevant stockpile to be offloaded, checked and then swept into the stockpile. Material is then processed from the front of the stockpile which ensures material is processed in line with the 'first in first out' principle.

2.2.2 Acceptance

All waste material accepted into EMR Darlaston will be in accordance with relevant Environmental Protection Procedures (EPP) summarised below –

The scrap metal loads are weighed in on the weighbridge, passing through radiation detectors, and in accordance with the Scrap Metal Dealers Act 2013 (as amended). A visual check of the material, aided by CCTV, is carried out whilst the vehicle is still on the weighbridge. Duty of Care paperwork is reviewed to ensure the description on the paperwork matches the visual appearance of the material before booking in the load. The vehicle is then directed to the appropriate tipping area and a trained member of EMR staff inspects the load as it is tipped. At this stage, an EMR operative would radio through to the weighbridge to report any issues with the load. On weighing out, the driver is issued with a duty of care waste transfer note (WTN) / weighbridge ticket (in accordance with the Waste Regulations, any non-conformities / discrepancies are recorded on the WTN.

2.2.3 Rejection of Waste Material

Waste material is rejected where non-compliant in accordance with the EPP 1.8 summarised below –

Any non-conforming wastes discovered are isolated and traced back to their source supplier where possible. If the source cannot be determined then the wastes will be suitably quarantined under the direction of the Depot Manager and/or Supervisor until it can be removed and treated at an appropriately permitted facility. Records of non-conforming wastes and associated disposal paperwork are kept on site/ made on the electronic management system.

2.2.4 Treatment

2.2.4 Recording Waste Movement

As per acceptance procedure (detailed in section 2.2.2) – waste movements are recorded in strict compliance with applicable waste legislation and associated Duty of Care (DoC) requirements.

2.3 Materials/Waste Storage Management

2.3.1 Duration

Wood waste tends to arise from broken pallets and reels which cannot be re-used and therefore this is a relatively slow moving grade. A bin can stay on site for up to 3 months until it is full.

Yard/ general waste tends to be removed more than once within one month form the small bins outside the main offices.

2.3.2 Stock Rotation

Due to operational requirements and space availability, it is considered impractical in attempting any waste rotation of the main scrap metal piles. Rotation would also cause increased concern with regard to noise (environmental nuisance) which owing to the size of stacks involved and meeting the expectations of FPP guidance, maybe required on a continual basis.

2.3.3 Waste Bale Storage

No waste will be stored in bale form on site.

2.3.4 Storage where maximum pile limits don't apply

Not applicable.

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

The wastes stored in containers are listed in Table 1 above.

General

General waste is stored in a hook lift bin normally adjacent to the maintenance area. It is not stored within 6m of any combustible wastes.

Wood

Wood is stored in a hook lift bin normally adjacent to the maintenance area. It is accessible on 3 sides and can be easily moved by a material handler if required.

2.4 Managing Common Causes of Fire

2.4.1 Managing Common Causes of Fire - Table 2

Managing Common Causes of Fire	
Risk	**Control Measure (if required)**
1. Arson	EMR Darlaston complex is surrounded on most sides by significant earth bunding topped with razor wire with a rail line beyond and along one boundary and a canal beyond and along another. The remainder of the boundary is metal fenced with lockable gates to prevent unauthorised access out of hours and all access gates are locked when not in use. The site also benefits from 24-hour CCTV. Outside operating hours a security guard is stationed on site and can monitor the site's CCTV system. The CCTV system can also be monitored remotely. These security measures will ensure any potential for arson on-site is prevented.
2. Plant/Equipment	All operational mobile and fixed plant is maintained and inspected by a competent person (completed in line with manufacturer's guidance). All records are kept on site in the main offices. Mobile and fixed plant are fitted with fire detection and suppression systems which have service and maintenance schedules. All plant and equipment on site are assigned safe working procedures, pre use check sheets and maintenance schedules. All defects are recorded on the action log. These pre-use check sheets ensure that before work commences, processing equipment is inspected accordingly. In addition to the above, at the end of each day operators of plant and equipment are given time to clean down their machines. This includes use of an on-site jet wash to remove any potential build-up of combustible waste, dust or/ fluff. The loading shovel is fitted with a radar system to prevent accidental collisions.
3. Electrical Fault/Maintenance	It is recognised that electrical faults are a common cause of fires (normally providing ignition). Only trained, competent and approved persons are permitted to work on electrical systems. Fixed testing is carried out at least every 5 years by a competent electrician and PAT testing is carried out every year by a competent electrician. Full details of required electrical testing and maintenance are detailed within EMR's 'H09-G01 Electricity') guidance (see Appendix 20). This document ensures that electrical equipment is properly constructed, installed, maintained and that the installations are suitable for the environment in which they will be operating. All electrical equipment is inspected prior to use to ensure that it is in safe working condition and all cables and plugs are checked to ensure that they are in good working order and that there is no obvious damage and that all covers and guards are in place. Electrical panels and distribution boards on-site all have a metal cover which is kept closed, electrical components / switches are only exposed when this is opened. These covers prevent any build-up of combustible waste, dust or fluff on electrical panels.

4. Smoking Policy	A smoking area has been designated at the side of the main office building. This is a safe distance (well in excess of 6 meters) away from any combustible wastes; refer to site plan for exact location (see Appendix 2).
5. Hot Works	Only maintenance hot cutting will occur on site when required.
6. Industrial Heaters	Industrial heaters such as portable electric bar heaters, paraffin heaters etc. are banned from all EMR depots and sites across the UK.
7. Hot Exhausts	Risk assessments undertaken at all EMR Scrap Metal facilities demonstrate that ignition exhausts from mobile plant pose a low risk. When the site is closed, mobile plant will be parked at least 6m from combustible material (see Appendix 1).
8. Batteries	Batteries are stored neatly in acid resistant bins under cover.
9. Leaks & Spillages	All spills will be cleaned up immediately using the spill kits available on site (see Appendix 1). If discovered, any leaking vehicles will be repaired or moved to the maintenance area where spill containment can be deployed without obstruction to the yard activities.
10. Build-up of Loose Combustible Materials	Regular housekeeping activity is undertaken on site to prevent the build-up of loose potentially combustible material on site (such as general waste).
11. Reactions between Wastes	All waste streams are separated on site to avoid 'reactions' that may cause self-heating or subsequent combustion to occur.
12. Hot Loads	EMR don't accept 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 identified through our waste acceptance procedures and rejected at the weighbridge. If this was not possible the load would be moved into the main designated quarantine area immediately where emergency procedures would be followed (see also section 3.5).
13. Heat & Spark Protection	In the ELV processing rig there is provision for use of ATEX approved equipment in this area to prevent the potential for sparks igniting any fuels / fuel vapours . Any sources of ignition will be kept away from all flammable materials (e.g. fuels, oils, solvents) – This will be a minimum distance of 6 meters. For example, flammable materials will be kept away from the hot cutting area. Safe Working Procedures (SWPs) are in place for staff and contractors when undertaking hot cutting or maintenance work involving oxy-propane welding or cutting. The relevant SWPs contain procedures to prevent fires starting (e.g. water containers on standby etc.). No hot works will take place near flammable substances. All staff who use hot cutting equipment are trained in the use of it and the training is recorded on the TCM system A Fire Watch will be maintained for at least 30 minutes following the completion of any 'Hot works' (e.g. hot cutting), and additional fire

	watch (site walkover) will be undertaken at the end of each day throughout the whole site. Mobile shovel drivers are required to lift the bucket from the ground when moving and only lower and engage with the ground before scooping and lifting scrap or other waste materials, to minimise the risk of any sparking. Rubber strips cannot be used at scrap metal processing sites because of the cutting and abrasive properties of waste scrap and concrete surfaces (life span of such strips would be very short for these types of site activities). Mobile plant (hot exhausts) do not operate near flammable sources (tanks / containers of flammable substances clearly signed and separated by barriers); mobile plant also possess radar to prevent collision (and also prevent proximity) with objects.
14. Gas Bottles & Other Flammables	An LPG & Nitrogen tank are used as part of the site activities. Refer to site plan (Appendix 1) for location Mobile plant will not operate near flammable storage areas (except for associated refuelling activity). Signage regarding prohibited items is located at the entrance gates and weighbridges. There are also no smoking and no mobile signs located in gas cylinder storage areas.
15. Smoke/Heat/Flame Detectors	As part of their general duties, operational staff are mindful of any sign of fire or potential or sources of ignition. Staff are trained to continually check for any signs of fire, and report any emergency immediately over issued site radios that connect with the main office. A Fire Watch will be maintained for at least 60 minutes following the completion of any 'Hot works' (e.g. hot cutting), and additional fire watch (site walkover) will be undertaken at the end of each day throughout the whole site. Site offices are fitted with smoke detectors to provide an early warning in the event of fire within the office facilities. The site benefits from CCTV cameras which will aid the visual and early detection of fires inside and outside of hours. The on-site security contractor has access to the CCTV footage on site and also patrols the complex regularly outside normal operating hours. The security guard is able to raise the alarm in an emergency, calling emergency services and site manager/key holders to instigate a quick response.
16. Training	EMR provides training to all employees through a combination of Safe Working Procedures (SWPs), Environmental Protection Procedures (EPPs), and external training courses. Training courses, including refresher courses are scheduled and controlled through a training matrix, this includes fire related training. All operational staff receive fire extinguisher training and certain appointed staff receive Fire Warden training (at least one per depot). High pressure hose training is given to a number of operational staff including how to operate the firewater tank controls.

	All site staff will be provided with Fire Prevention Plan Awareness training, dependent on level this will either take the form of a Tool Box Talk (for site operatives) or one to one training with site management encompassing the whole of the plan in detail (given by the regional SHE Manager / SHE Specialist). All employees are also made aware of the company's environmental policy and their roles and responsibilities through tool box talks or seminars. On commencement of employment employees are given an induction course and they are advised of the environmental and safe working practices, aspects and impacts of their operation (which includes fire prevention and control). Employees are informed and updated of changes in procedures etc. and any changes to emergency preparedness and response requirements. EMR ensure adequate cover is provided with respect to Operator Competence. The Site Manager will possess the relevant WAMITAB qualification and additional cover is provided within the group for periods of absence or holidays.

2.5 Detection Systems

Fixed thermal detection cameras will be installed facing the combustible waste storage areas. When heat is detected it will send a visual and audible alarm to the workforce within the building who will action as necessary.

When the site is not operational the alarm will be sent to the security guard who will action as necessary.

Offices and canteens will have smoke detectors installed.

2.5.1 Systems in Use

Unauthorised access to the site is prevented since the only access points are adjacent to the offices and weighbridges on Bentley Road South and Heath Road. This is an important requirement for the operations, not only for the protection of the environment and human health, but also because of the value of the materials in store. In particular, the site benefits from -

- Metal gates are securely locked outside operational times. Security personnel monitor/patrol the site outside operational hours.
- A CCTV system is installed which allows 24hr monitoring.

Security measures are inspected on a regular basis to assess their continued integrity and the results of the checks recorded on site.

2.5.2 Third Party Certification (UKAS Accreditation)

The CCTV camera detection systems employed are not automated and do not require associated 'third party accreditation (UKAS). Detection/ auto-suppression systems in the fixed plant and mobile plant are inspected regularly and serviced annually.

2.6 Demonstrating Quality of Stock

Waste acceptance and rejection procedures mentioned at Section 2.2 above assist in reducing the quantity of contamination in the inwards material. Merchants delivering to the site are known to EMR and waste specification has been communicated.

Section 3 – Preventing Spread/Limiting Impact of Fire

This section demonstrates procedures that can limit the impact/spread of any fire (should it happen), and with the aim that any fire will be extinguished within 4 hours.

3.1 Separation distances

The relatively large total area of the site enables the potential fire spread to be reduced significantly, as combustible materials are stored away from each other (and from flammable and ignition sources).

Unless fire walls are in place there will be a minimum of 6m separation between different types of combustible materials (waste piles) and between combustible and flammable materials limiting any potential fire spread and affording access to emergency services and plant movements (moving materials etc.) where required.

The 6m separation distance will also be employed on the site boundary (where relevant) to eliminate risk to surrounding business/property in any emergency situation.

Mobile plant are parked up in locations overnight as shown on the drawing at Appendix 1. These locations are not within 6m of any combustible/ flammable waste.

3.2 Use of Fire Walls

Fire walls will be used in the bays storing fridges, plastics and foam. These fire walls will be fabricated of concrete and will resist fire for at least 120 minutes.

3.3 Storage of Waste in Bays

Storage bays will be used for fridges, plastics and foam. Bays will be constructed of fire walls as described above.

3.4 Use of Suppression Systems

3.4.1 Building Suppression

No waste will be stored in the processing building when the site is closed.

3.4.2 Other Suppression Systems in Use

There are two 30,000 and 1 50000 litre firewater tanks with high pressure hose attachments available across the complex with sufficient lengths of hose to reach all areas where potentially combustible waste is stored.

The canal is used by the fire service if there is a fire in the vicinity of the Heath Road access. There is also a fire hydrant at the entrance from Heath Road. The hydrant is managed and maintained by the FRS.

Fire extinguishers are available in the mobile plant, in the offices and welfare areas. Locations have been identified on the site plan in appendix 1.

3.4.3 Third Party Certification (UKAS Accreditation)

3.5 Active Firefighting

EMR will facilitate and encourage active firefighting where safe to do so and where practicable. EMR has sufficient and suitable procedures in place to facilitate firefighting. The site has the availability of fire extinguishers and three 30,000 litre and one 50,000 litre tanks (with high pressure pumps and firefighting hoses). For medium and large fires the FRS are always contacted.

The water tanks are positioned across the complex to provide cover and has enough hoses housed within it, giving the ability to reach every corner of the site where it may be required. EMR staff are trained in firefighting to various degrees and are experienced in moving and isolating fires.

All staff are available on site, or would be contacted to attend the site in any emergency. This includes ensuring suitable staff are available out of hours to operate mobile plant machinery etc. In all fire emergency circumstances, the FRS will be contacted to provide assistance if and when required. Emergency Services/Fire Rescue Service will have easy access to the main site via 2 large gated main entrances. The location of the site also allows for any potential firefighting activity from the canal, and the water tank is compatible with FRS equipment (see appendix 2).

The installation of robust firefighting equipment (fixed water tanks) ensures EMR have the ability to immediately fight and contain a fire in its early stages before the fire services attend site and take control of the situation. The equipment will then be used alongside the fire services appliances to assist with firefighting, ensuring the fire is extinguished within 4 hours. In addition to the above the FRS able to access the fire hydrant (located in Bentley Road South) and also the nearby canal if necessary. The hydrant is reported by South Staffs Water to be able to provide approximately 1.5 bar of pressure to the FRS.

3.5.1 Availability of Quarantine Area

The site has capacity to ensure that space will be made available in any emergency situation to accommodate 50% of the largest pile on site (both quarantine areas measures 24mX12mX3m=864m^3). The quarantine area is detailed within Appendix 1.

The area used is within the site permitted boundary, and benefit from a sealed drainage system – allowing for flexibility in providing sufficient 'active firefighting' capability.

3.6 Water Supplies

Due to the size of the largest heaps of material, EMR are unable to demonstrate the availability of water required as stated within FPP guidance and demonstrated within section 3.6.2 – Table 3.

However, alternative solutions have been included in relation to the availability of water in the canal and the use of material handlers to pull apart burning heaps if required/ permitted by the FRS.

3.6.1 Availability

There is a fire hydrant just outside the entrance to the complex from Heath Road (see appendix 2). The hydrant meets relevant BS standards and as a result of this the fire services equipment would be compatible with them when attending site. EMR are advised by South Staffs Water that the hydrant is supplied from the same mains system to the firewater tanks on site.

EMR have installed two 30,000 litre and one 50,000 litre tanks across the complex which will provide an immediate response in an emergency situation. The tanks are provided with high pressure pumps and fire hoses.

1.2.1.4 Fire Prevention Plan

In the initial and immediate response phase, EMR have a capability to distribute approx. 4,500 litres per minute until the FRS arrive on site. The closest fire station is in Wednesbury less than 3 miles from the complex, and can respond comfortably in around 10 minutes.

The FRS have an array of equipment and tenders that are also capable of drawing water from the canal.

3.6.2 Water Calculations - 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
420m^3	2800	504,000	2 x 30,000 litre & 1 50,000 litre tanks = 110,000 litres The balance is provided by 1) Canal 2) Hydrant outside the main entrance at Heath Road.

3.6.3 Managing Firewater (Containment)

The site benefits from a full retention interceptor with penstock valve located on the pedestrian path to the weighbridge

During an incident the site will close the penstock valve and use the site surface to hold firefighting water. This area will hold approximately 212500 L of water and is shown on the drawing in Appendix 2.

Any firewater derived from fighting a fire in the WEEE will be assumed to contain POPs and disposed off-site appropriately.

3.7 Notifying Stakeholders

In the event of an emergency, EMR will enact its 'crisis communication plan' – this includes a central liaison facility to make contact with all internal and external stakeholders and the local press. The emergency services communication structure will also be used in line with advice from disseminating relevant information from Public Health England (if required).

The security guard is instructed to ensure access to the facility is restricted only to those parties that need to be on site during an emergency out of operational hours.

3.8 Contingency Planning

An Emergency Response Plan has been implemented at the site and encompasses fire, major spillage, pollution incidents, receipt of highly dangerous waste (e.g. asbestos, munitions) etc.

The Site Manager and key staff are familiar with the document and this document is placed in a prominent place (noticeboard etc.).

Emergency fire drills are conducted at the site once per quarter and include practicing fire-fighting procedures as described in the fire prevention plan.

In the event the site reaches capacity or needs to close for whatever reason (such as any emergency), there are other EMR facilities that waste can be diverted to at short notice:

- EMR Willesden (fridge depollution plant)

3.8.1 Clearance & Decontamination

Disposal of firewater

Immediately following a fire incident on site, the use of large volumes of water will subsequently generate significant quantities of potentially polluting fire water. Firewater will initially enter the drainage system fitted with silt traps to remove any solids within the water prior to draining into the full retention interceptor on the shear yard or the bypass system serving the baler yard. Firewater collecting on the shear yard can easily be prohibited from discharging until authorised as it is fitted with a penstock valve. The discharge of water from the full retention interceptor by the shear is the subject of a trade effluent discharge consent from Severn Trent Water.

The discharge to foul sewer from the bypass interceptor by the light iron bay is not currently fitted with a penstock valve or subject to any trade effluent discharge consent from the water authority although an application was made to Water Plus in 2018 and raised proactively with them and Severn Trent on a number of occasions since. The baler yard discharge point will be fitted with a penstock valve in September 2021. No discharge of firewater to sewer will be made unless deemed suitable by Severn Trent Water.

Once the fire has been extinguished plans are immediately made to dispose of the firewater to a suitably permitted and approved waste facility of if of suitable quality suitable discharged to sewer. In the majority of cases firewater will be removed from the drainage system to a suitable pre-approved treatment facility. Water used to treat any fire in the SMW bay will be assumed to contain POPs and will be handled as such. Only approved contractors are authorised to remove, treat and dispose of waste leaving the site.

Disposal of burnt material

The disposal route for any burnt remnants of scrap will be sent to an appropriate pre-approved facility in accordance with any special acceptance procedures that they may require to process such waste. For example partially combusted light iron or steel can waste (in feed) once fully extinguished and cooled could be processed through a shredder / fragmentiser. Other waste materials would need to be assessed and then transferred to an approved and permitted waste facility to be disposed of compliantly, this may potentially require a WAC test if the burnt waste is to go to a landfill site. An approved and permitted landfill site would be used to dispose of this material.

3.8.2 Becoming Operational

Reporting/Lessons Learnt

Following any environmental incident including fires, details of the event are recorded and reported on an Event log on EMR's electronic TCM management system. This Event log or electronic reporting system enables all the details of the fire to be recorded including sequence of events, size and extent of fire, damage sustained (internally and

externally), recording of the investigation and actions taken (recorded on Action log). Data from the TCM system (including data from recorded hazards interventions) can be accessed to obtain trends and identify common factors and obtain other useful information.

Resuming Activities

Normal activities would not resume until the site has been fully decontaminated and assessed as fit for purpose, both operationally and in achieving full FPP compliance.

Appendices

Appendix 1 Storage & Quarantine Site Plan

Appendix 2 Drainage & Firefighting Equipment Site Plan

Appendix 3 Sensitive Receptors Site Plan

Appendix 4 Groundwater Vulnerability Site Plan