Fire Prevention Plan

Prepared on Behalf of:

Luton Metal Recycling Limited

The Railway Arches
Colindeep Lane
Colindale
NW9 6HD

Environmental Permit:
YP3691NW

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1 Introduction

1.1.1 This Fire Prevention Plan explains how operational procedures laid out in this Fire Prevention Plan ensures that the risk of fire is minimised and any outbreaks are effectively controlled.

1.1.2 This document is separate to any documentation intended to meet the Health & Safety obligations associated with the Regulatory Reform (Fire Safety) Order 2005.

1.2 Interpretation

1.2.1 'Responsible Person' refers to any person trained and responsible for monitoring and reporting as detailed in this Plan i.e., Senior Management (Directors, the Technically Competent Manager, the Site Manager and any Supervisors).

1.2.2 'Fire Marshal', relates to any person appointed & sufficiently trained with specific responsibilities in the event of a fire.

1.2.3 'Operative', relates general yard staff.

1.2.4 'Accumulation of Waste', relates to wastes stored onsite be they in a loose pile or in a container.

2 Fire Prevention Plan

2.1.1 This Plan has been prepared with reference to the following documents:

- Fire Prevention Plans: Environmental Permits Environment Agency Guidance.

3 Fire Risk Scoping Exercise

3.1.1 The controls and measures are aimed at reducing:

1) Minimising the likelihood of a fire happening;
2) Aiming for a fire to be extinguished within 4 hours;
3) Minimise the spread of a fire within the site and to neighbouring sites.

3.1.2 The Risk Assessment presented in Section 4 Table 1 underpins the measures adopted.

4 Fire Risk Assessment

Table 1: Possible Causes of Fires as identified within the Fire Prevention Plan Guidance

Potential Source of Ignition	Prevention/Management
Arson;	Enclosed site perimeter Security cameras in operations for remote monitoring & identification, which cover all areas of the site. Location remote from centre of population.
Self combustion	The site does not intend to accept fine materials such as tyre crumb, which can both be prone to spontaneous combustion.
Plant or equipment failure	Daily inspection of all equipment/machinery by operatives. End of Day Procedures Fuel storage tanks provide 110% secondary containment (at a distance from loose combustible material accumulations).
Plant or equipment operation	Inspection procedures as detailed above. Reliance will be placed on Fire Fighting Equipment and the planned preventative maintenance schedule as detailed.
Electrical faults or damaged/ exposed electrical cables	Preventative maintenance via weekly inspections of all electrical equipment to ensure that any obvious visual signs of damage or deterioration do not go undetected. A qualified electrician will install all new electrical supplies.
Naked (hot) light fixtures	No naked sources of ignition are within 6 metres of combustible or flammable materials.
Discarded smoking materials	No smoking in permitted area.
Hot works e.g. welding, cutting	Hot works are completed as required, which would include the cutting of scrap metals to reduce their size for onward management (oxygen/propane only).
Industrial heaters	No industrial heaters onsite.
Hot exhausts	Fire watch conducted at regular intervals throughout the operational day (ongoing monitoring). Equipment is parked at a safe distance of at least 1 metre from accumulation of risk materials. End of Day Procedures.
Open burning onsite	No open burning takes place onsite.
Incompatible materials	All materials are stored within designated areas. Detailed acceptance procedures are followed by all Operatives
Neighbouring site activities	Adjacent operations are commercial/industrial in nature.
Hot loads deposited at the site	Hot loads are not accepted. Detailed acceptance procedures are followed by all Operatives
Weather, e.g. lightning strikes	Naturally occurring and uncontrollable.

4.1 Operational Flow Diagrams (Combustible Materials).

4.1.1 The operation is summarised in the Operational Flow Diagrams below:

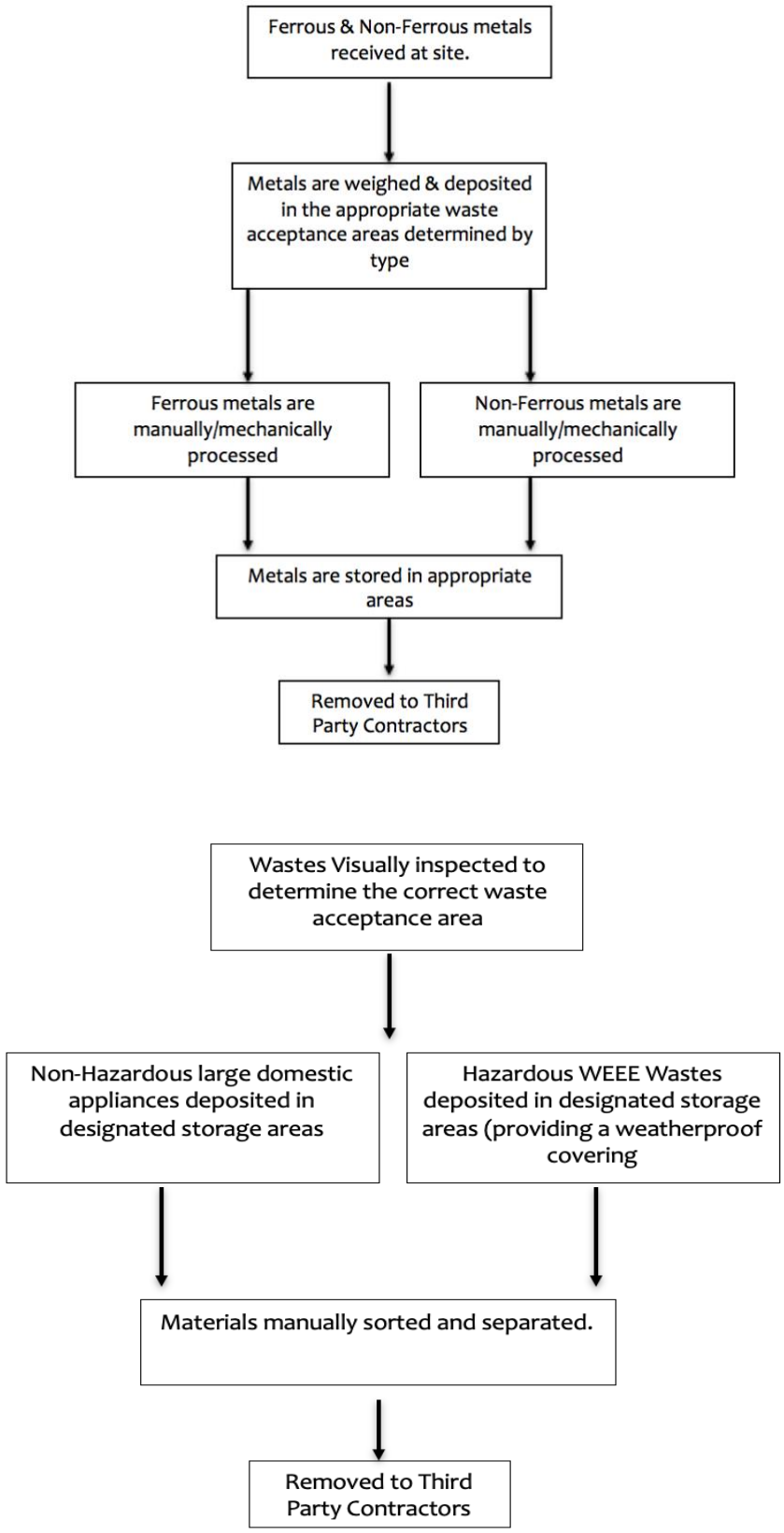


Figure 1: Operational Flow Diagrams

5 Preventing Fires

5.1.1 Luton Metal Recycling proposes to operate a Metal Recycling Site & WEEE AFT at their site at The Railway Arches.

5.1.2 The site will receive between 100-150 tonnes of material each day.

5.1.3 Vehicles are inspected prior to purchasing to ensure no concealed items are present, such as canisters/hypodermic needles/wastes or any other items that should not be present. In the event of these items being discovered during the inspection process the vehicles will be rejected and the vehicle will not be purchased.

5.1.4 Non-waste motor vehicles are assessed for resale suitability; if the vehicles are not suitable for resale, they become waste on the site of production and will be transferred to the area benefitting from an impermeable concrete surfacing for processing.

5.1.5 All drivers are instructed to inspect loads prior to collection to ensure any potential sources of ignition are not present and will adhere to strict waste acceptance procedures that form part of the site Environmental Management System (as detailed in Appendix FPP7).

5.1.6 Materials will be unloaded in designated 'tipping areas' and inspected for the presence of any fire risks (e.g., glowing embers or explosive materials or signs of flammable liquids), which will be moved to the quarantine area and extinguished.

5.1.7 Extinguished material will be monitored prior to isolation in a designated skip/container, which will be brought forward as necessary & removed within seven working days.

5.1.8 Acceptable materials are stored in areas/bays/skips around the facility dependant on type & composition, as shown on the Site Layout Plan within Appendix FPP2. Combustible materials will be removed from site within one month of acceptance.

5.1.9 Materials stored pending inspection will be constantly monitored & worked (as necessary) to prevent the build-up of heat.

5.1.10 A Fire Quarantine Area of at least 56.25m^2 (7.5m x 7.5m) plus a 6m buffer zone is always available. The area will accommodate over 50% of the single largest accumulation of combustible waste, equating to 225m^3 of waste (e.g., stored 4 metres high). The fire quarantine area is located as shown on the Site Layout Plan in Appendix FPP2.

5.1.11 The Responsible Person will ensure that a suitable fire quarantine area is available at all times and will conduct a visual check at the commencement of daily operations and throughout the day (fire watch). All staff members will be made aware that an area is to be kept clear for this purpose & its importance.

5.1.12 Material will be stored in their largest form & pile sizes will be minimised wherever possible, according to operational need.

5.1.13 Potentially explosive & flammable fluids are stored at least 6 metres away from other combustible materials. Leakage/spillage procedures would be implemented in the event of damage as detailed in Appendix FPP1.

5.1.14 Only Competent Persons that have completed training will be authorised to perform 'hot work' activities, which are approved by Responsible Persons onsite. A Permit to work system (opening for the work and being closed once the work has been completed) is in place for all hot work activities, which will ensure the area is monitored at regular

intervals (every 15 minutes and ongoing) during the hot work activities being completed and for the next couple of hours following the completion of the works. Fire extinguishers will be kept at hand all times 'hot works' are undertaken. All hot work activities will be undertaken at least 6 metres from any accumulation of combustible materials.

5.1.15 Operatives remain constantly vigilant throughout the working day (ongoing monitoring) for any signs of a fire from hot exhaust or engines, which includes the inspection of static & mobile equipment before & after breaks. A fire watch will be conducted at the end of the working day as part of the site End of Day Procedures, as detailed at Section 10.

5.1.16 Fire Watch Procedure (During Working Day) Conducted by Operatives (Conducted Hourly by a Responsible Person):

1. That all mobile plant is parked at a distance from any combustible material (minimum 6 metres) and that there is no trapped debris located within the vicinity of exhausts.
2. That no material is trapped within static plant.
3. That no debris has settled onto hot exhausts and engine parts.
4. That a suitable fire quarantine area is available at all times.

5.1.17 Responsible Persons will undertake weekly inspections of all provisions listed within Table 5. A Responsible Person will carry out a detailed weekly inspection of all onsite equipment.

5.1.18 Li-ion batteries (if accepted) will be stored in an appropriate way to prevent damage and any damaged batteries will be isolated and stored at a safe distance from other combustible wastes and any buildings.

5.1.19 Maintenance requirements & all records will be kept within the site office and any necessary maintenance recorded on the appropriate documentation & logged. All faulty equipment will be isolated pending repair. Operatives complete daily pre-user inspections on all equipment before they are used (leakage/spillages identified) and report all defects to management for actioning, management will determine if the equipment can still be used pending a repair.

5.1.20 The site does not accept electric vehicles.

5.1.21 All static & mobile plant will be maintained to manufacturers recommendations.

5.1.22 Operatives inspect all machinery/equipment on a daily basis to ensure that no leakages are apparent; which are rectified immediately. Site staff will be alert to any such leakages or trails that might develop during the day and in the event that such is detected the site leakages/spillage response procedures presented in Appendix FPP1 will be actioned.

5.1.23 Operatives conduct routine housekeeping activities (i.e. cleaning & tidying) as necessary and as a minimum on a daily basis but as required, alongside End of Day Procedures detailed in Section 10.

5.1.24 In the event of a fault with equipment that may pose a risk of fire being discovered the following procedure will be followed: -

1. Switch off the equipment immediately if safe to do so
2. Isolate the equipment; and
3. Report the fault to a Responsible Person. A Responsible Person will inspect the equipment, records the fault in the Defect Sheets & will contact the internal engineers

to complete necessary repairs. A replacement may be ordered if necessary to cover interim downtime. A sign will be clearly displayed stating that the equipment is not in use.

5.1.25 Fire extinguishers are strategically located throughout the site. All static plant, mobile plant & vehicles will have fire extinguishers installed. A Responsible Person inspects all extinguishers on a weekly basis and they are serviced annually & discharged as required. Spent extinguishers are replaced as soon as identified.

5.1.26 Electrical equipment is inspected by a Responsible Person on a weekly basis & any defects (loose cables, deterioration, or wear) are recorded in the Site Diary. Only a qualified electrician will be instructed to assess & complete necessary repairs, as well as to ensure all electrical equipment is certified. An EICR will be completed every 5 years as legally required for all electrical supplies for the yard.

5.1.27 The whole site under control of the operator is surrounded by palisade fencing/panelling and can only be accessed through the main entrance gates, thereby ensuring that unauthorised access to the site is prevented at all times.

5.2 Self-Combustion

5.2.1 Certain materials can self-combust under certain conditions as a result of: -

1. A physical reaction such as fine materials with large surface areas prone to friction; and/or
2. A biological reaction through degradation processes; and/or
3. A chemical reaction if coming into contact with corrosive substance such as strong acids and bases.

5.2.2 Self-combustion is most possible during hot conditions or where waste is left to stagnate for extended periods or items exist within the waste that cause combustion over a period of time. The likelihood of self-combustion occurring has been assessed as low, due to the nature of the waste handled at the facility & the produced detailed within this Fire Prevention Plan. Furthermore, all wastes that are mechanically processed are stored in containers/bays/areas the open allowing air circulation.

5.2.3 Material Management & Mitigation Measure Procedures: -

1. On a precautionary basis operatives throughout the working day will monitor each area/container holding combustible materials. If the monitoring indicates any evidence of a 'hot spot' forming (such as visible steam, discolouring or odour i.e. indicating degradation) a Responsible Person will be notified and Condition 1 of Table 2 will be implemented immediately.

6 Detecting & Suppressing Fires

6.1.1 All staff members undergo fire training as part of their induction (thinking what to do to prevent fires, what to do during a fire and specific site requirements as detailed in this document) with refreshers as required (annual as a minimum). Staff members will be trained on the contents of this Fire Prevention Plan, which is accessible at all times for them to refer to if needed, as the compliance folder is kept within the site office.

6.1.2 All fire-fighting equipment is checked to ensure it is present on a weekly basis.

6.1.3 Fire Drill Procedure:

1. A fire drill is carried out annually (separate activity to the FPP training, as this is a separate legal requirement) so that everyone understands what they should do in the event of a fire, and how to evacuate the site.
2. Records must be kept regarding each drill. Special attention should be given if the drill was slow or incomplete
3. All fire points should be checked once a year

6.1.4 Reliance will be placed on equipment horns, operatives shouting "FIRE". Given the assessed low risk level & that materials are stored in the open yard an automated detection system is not deemed necessary or suitable.

6.1.5 Reliance will be placed on the non-UKAS accredited CCTV detection system, which covers the whole site (Locations shown on the Site Layout Plan in Appendix FPP2).

6.1.6 Equipment available to tackle a fire:

1. Portable Dry Powder (Class D) & CO_2 fire extinguishers, located as shown on the Site Layout Plan in Appendix FPP2.
2. Fire Hose, located as shown in Appendix FPP2.
3. Hydrant Map located as shown in Appendix FPP3.

6.1.7 Fires would be initially tackled with strategically positioned fire extinguishers/hoses distributed throughout the yard as shown on the Site Layout Plan in Appendix FPP2.

6.1.8 Given the assessed low risk level & that materials are stored in the open yard an automated suppression system is not practicable.

6.2 Detection Out of Hours

6.2.1 The site benefits from an out of hours watchman that will conduct regular patrols (approximately one every hour) to enable a rapid identification of a fire during non-operational hours in the unlikely event that a fire started. The watchman must contact points around the site to register the inspection, which is presented as a printout in the morning for the Directors to review. Therefore, the site is constantly monitored. In the event of a fire the security watchman will contact the FRS immediately and notify two responsible persons to attend site to support the actions as stipulated in Table 3 overleaf and will be able to implement the requirements of this document.

6.2.2 CCTV cameras cover all areas of the site and are at a height that ensures all areas of the site are covered.

6.2.3 Responsible Persons can monitor (if required) the site during non-operational via the internet on mobile telephones or laptops, which could be in the event of a notification

from the watchmen or in the event of an alert triggered by the CCTV monitoring system. Location of the CCTV Camera is shown on the Site Layout Plan (Appendix FPP2).

6.3 Fire Conditions

Table 2: Fire Fighting Conditions

Alert Condition	Characteristics	Action	Preparation
Condition 1	Materials Smoking	Operatives will turn the material stockpiles utilising mechanical equipment to enable any trapped heat to be released.	Fire extinguishers ready for deployment. Be prepared to initiate fire procedures (Section 13) Responsible Person to be notified if not already present.
Condition 2	Visible Flame	Raise the site fire alarm immediately & initiate Fire Procedures detailed at Sections 13 If safe to do so tackle the blaze utilising onsite fire-fighting provisions including: - • Fire Extinguishers Deploy on small scale fires • Fire Hose. • Alert FRS	Prepare the fire quarantine area
Condition 3	Full Fire Established	Remove materials ablaze to the quarantine area deposit them in the fire quarantine area if safe to do so, so extinguishing/suppressing/tackling can take place, location shown on the Site Layout Plan in Appendix FPP2. On arrival of the FRS the appointed Responsible Person will transfer control of the incident over to the Incident Commander who will direct site operatives accordingly.	Prepare for the arrival of the FRS and follow all instructions.

6.3.1 These provisions aim as far as reasonability possible to ensure that if a fire were to break out it would be extinguished within 4 hours.

6.3.2 The internal site layout is such that FRS can access all areas of the site at all times and HGV's are able to enter the site without obstruction. It is therefore, considered that there is suitable access for fire tenders to manoeuvre freely around the site should a fire break out.

7 Fire Prevention Equipment Inventory and Procedure

Table 3: Fire Equipment Inventory

Material	Procedure	Trained User	Location
Fire Extinguishers	Fire Extinguishers are used in the event of fires.	All staff are trained on how, when & what types of Fire Extinguishers should be used in the event of a fire depending on the composition of the material ablaze.	Locations as shown on the Site Layout Plan (Appendix FPP2).
Fire Hose	Water hose are used in the event of fires.	All staff are trained on how and when to deploy the fire hose.	Locations as shown on the Site Layout Plan (Appendix FPP2).
Fire Hydrant	Hydrant used in the event of a fire.	FRS will utilise hydrant.	Locations as shown on the Hydrant Map (Appendix FPP3).

8 Material Storage & Management

8.1.1 Scrap Metals are stored in a variety of containers/skips as detailed in Section 9 Table 4 & as shown on the Site Layout Plan in Appendix FPP2. Each container/skip will be accessible from at least one side.

8.1.2 Scrap Metals are stored in bays as detailed in Section 9 Table 4 & as shown on the Site Layout Plan in Appendix FPP2.

8.1.3 WEEE Wastes (Non-Hazardous LDA) are stored in bays as detailed in Section 9 Table 4 & as shown on the Site Layout Plan in Appendix FPP2.

8.1.4 WEEE Wastes (Hazardous) are stored in cotainers/skips as detailed in Section 9 Table 4 & as shown on the Site Layout Plan in Appendix FPP2.

8.1.5 Combustible materials stored within bays benefit from concrete dividing bay walls and concrete retaining walls. All dividing bays walls are constructed from concrete with steel reinforcing bars providing up to 4 hours (240 minutes) fire resistance (radiation & spreading), which meet the A1 class fire resistance standard (DIN EN 13501-1).

8.1.6 Concrete is a non-combustible material and has a slow rate of heat transfer that provides shielding from heat and enables natural cooling. It is accepted in the industry that concrete "can be described as virtually fireproof"[1]. The concrete dividing walls will prevent any sparks escaping. Furthermore, the site perimeter is delineated by a concrete wall, which creates a sealed fireproof barrier. Since concrete is a non-combustible material maintaining a 6-metre separation between accumulations of waste materials & the perimeter itself is deemed disproportionate based on the associated risk.

8.1.7 Batteries/Catalysts are stored in a container as detailed in Section 9 Table 4 & as shown on the Site Layout Plan in Appendix FPP2.

8.1.8 Containment in identified areas (as shown on the Site Layout Plan in Appendix FPP2) ensures materials are isolated from potential sources of ignition and from environmental elements such as wind (fanning). The storage areas or containers will ensure that materials are well ventilated and able to cool naturally, whilst providing a thermal barrier.

8.1.9 Given the types & nature of the materials stored onsite, external heating during hot weather is not considered to pose a real risk of combustion; for example it would require a temperature of 1365 Celsius to melt steel. However, on a precautionary basis material stockpiles will be inspected daily during summer months. If the monitoring indicates that a 'hot spot' is forming (such as steam or discoloration) the procedures detailed in Section 6.3 Table 2 will be enacted.

8.1.10 At least once every quarter, the storage areas will be inspected for damage and repaired as needed as part of the preventative maintenance regime.

8.1.11 The site will turn over materials as quickly as practicably possible, operating a 'first in first out' policy, as detailed in the procedure in Section 8.1.12. Materials will be kept onsite until sufficient quantities have accumulated to constitute an economic onward load, or the maximum storage limits detailed at Table 4 have been reached, i.e., no material will be left within the containers/skips as these will be loaded directly onto HGVs and transported to an authorised receiving site.

[1] http://www.concretecentre.com/Performance-Sustainability-(1)/Fire-Resistance.aspx

8.1.12 First In First Out Procedure:

1. Operatives will deposit all 'new' incoming wastes at the front of any accumulation within an area/bay/pile. Incoming/outgoing materials are recorded via the internal computer system, which can be reviewed and monitored to ensure materials are only stored onsite for the specified periods of time.
2. Operatives must load all collection vehicles with the oldest materials first (accumulations at rear of bay), therefore materials at the back of the bay will be loaded in the first instance (i.e., a first in first out policy);
3. Containers once full are removed from site, with no residual materials remaining once they have been removed, which will ensure no older materials are left onsite for a prolonged period of time.

8.1.13 Containers/skips once full will be removed from site, which is the 'first in first out' policy.

8.1.14 Container Isolation Procedure

A. Operatives on identification of a fire within a container will enact procedures as detailed at Table 2.

B. Each container will, if safe to do so be moved utilising a forklift (by connecting the grab head to the lip of the container) & dragged to the fire quarantine area, after which extinguishing (smothering/burying or deployment of water) will be attempted pending FRS arrival.

8.1.15 A Responsible Person will supervise all operational activities onsite to ensure the 'first in first out' principle is adhered to.

8.1.16 A freeboard space of no less than 1 metre will be maintained between the apex of materials stored within a bay, which will include the dimensions of any dividing bay walls. Responsible Persons will ensure the stated freeboard and distance is maintained at all times.

9 Combustible Material Storage Arrangements

Table 4: Combustible Materials Storage Arrangements

Site Layout Plan Reference	Combustible Material	Storage Arrangements	Width Maximum (metres)	Depth Maximum (metres)	Height Maximum (metres)	Volume Maximum (metres cubed)	Minimum Separation Distance From Other Loose Combustible Waste (metres)	Storage Time Onsite (Working Hours/Days)
1	Weighbridge	-	-	-	-	-	-	-
2	Office	-	-	-	-	-	-	-
3	Toilets	-	-	-	-	-	-	-
4	Workshop	-	-	-	-	-	-	-
5	Baler/Shear	-	-	-	-	-	-	-
6	Scrap Metal (Waste Acceptance Area)	Stored loose in bay	18	6	4	432	0.5	3 Months
7	Scrap Metal	Stored loose in bay	18	6	4	432	0.5	3 Months
8	Scrap Metal	Stored loose in bay	12	6	4	288	0.5	3 Months
9	Scrap Metal	Stored loose in bay	12	6	4	288	0.5	3 Months
10	Scrap Metal	Stored loose in bay	12	6	4	288	0.5	3 Months
11	Scales	-	-	-	-	-	-	-
12	Scales	-	-	-	-	-	-	-
13	Scrap Metal	Stored loose in container	6	2	2.5	20	0.5	3 Months
14	Scrap Metal	Stored loose in container	6	2	2.5	20	0.5	3 Months
15	Scrap Metal Processing/Storage Area	-	-	-	-	-	-	-
16	Cables (POPS)	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months

17	Cables (POPS)	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
18	Scrap Metal	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
19	Scrap Metal	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
20	Scrap Metal	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
21	Scrap Metal	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
22	Storage Containers	-	-	-	-	-	-	-
23	Scrap Metal	Stored loose in containers	6	2	2	24	0.5	3 Months
24	Batteries	Stored loose in containers	4	4	2	32	0.5	3 Months
25	Skip/Container Storage Area	-	-	-	-	-	-	-
26	Scrap Metal	Stored loose in container	6	2	2.5	20	0.5	3 Months
27	Scrap Metal	Stored loose in container	6	2	2.5	20	0.5	3 Months
28	Scrap Metal	Stored loose in bay	12	6	4	288	0.5	3 Months
29	Scrap Metal	Stored loose in containers	6	2	2	24	0.5	3 Months
30	Hazardous WEEE	Stored loose in containers	6	2	2	24	0.5	3 Months
31	Scrap Metal	Stored loose in container	6	2	2.5	20	0.5	-
32	Scrap Metal	Stored loose in container	6	2	2.5	20	0.5	3 Months
33	Scrap Metal	Stored loose in container	6	2	2.5	20	0.5	3 Months
34	Scrap Metal	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
35	Scrap Metal	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
36	Scrap Metal	Stored loose in skip	4.2	1.8	2	15.12	0.5	3 Months
Grand Total						**2,396.08 (Metres Cubed)**		

10 End of Day Operations

10.1.1 All operatives conduct an end of day inspection on all mobile equipment once parked to ensure that no trapped debris is located in the vicinity of the exhausts or around electrical equipment.

10.1.2 A Responsible Person is notified after mobile equipment has been parked and inspections conducted.

10.1.3 A Responsible Person conducts a final end of day inspection prior to closure (at least 30 minutes before the site is closed and security watchmen take over) to ensure: -

1. All mobile plant is parked in the designated parking area over 1 metre away from accumulations of combustible wastes.
2. Whenever possible no material will be left uninspected in any 'tipping area'.
3. No material is trapped within static plant.
4. No debris has settled onto hot exhausts and engine parts completed once equipment is parked for the day (Fire Watch)
5. Everything is switched off & no combustible materials are around electrical equipment.
6. No visible signs of flames or embers are present

11 Fire Water & Containment

11.1.1 As required by the Fire Prevention Plan Guidance, a minimum water supply of at least 2,000 litres/min for a minimum of 3 hours is required for a 300 cubic metres pile of combustible material. This equates to 6.6 l/min (2000/300) per cubic metre of combustible material. At least 520,992 litres of water (6.7 l/min x 432 = 2,894.4 l/min x 180 minutes) would be required were the complete contents of the single latest accumulation ablaze (loose materials) and would be 36,180 litres of water (6.7 l/min x 30 = 201 l/min x 180 minutes). Reliance will be placed on the fire fighting provisions as detailed at Table 5 below.

Table 5: Fire Fighting Provisions

Fire Suppression Provisions & Water Delivery Systems	Specification	Cumulative Supply l/mins	Total Volume m3 Available (for up to 180 mins)
Primary Suppression Equipment (Non-water Provisions)			
Fire Extinguishers (Dry Powder/Co2)	An array of Portable Fire Extinguishers suitable for tackling a range of fires.	-	-
Secondary Suppression Equipment (Water Provisions)			
Standard Hose	Mains Pressure Capable of Delivering 100 l/min	100	18000
Standard Hose	Mains Pressure Capable of Delivering 100 l/min	200	36,000
Standard Hose	Mains Pressure Capable of Delivering 100 l/min	300	54,000
Standard Hose	Mains Pressure Capable of Delivering 100 l/min	400	72,000
Hydrants (within 100 metres)	75mm mains capable of delivering 2,500 l/min	2,900	522,000
Grand Total		2,900	522,000
Tertiary Suppression Equipment (Water Provisions)			
Fire Tender	45mm standard jet capable of delivering 220 l/min (approximately 6,000 litres)	220	6,000
Grand Total		220	6,000

11.2 Fire Fighting Water

11.2.1 In the event of water being required the following provisions are available:

- Fire Hose:
  Four fixed hoses are installed throughout the site, which are connected directly the mains water supply. Each hose is capable of delivering 100 l/min, locations as shown on the on the Site Layout Plan within Appendix FPP2. In the event of deployment, the fire procedures detailed at Table 2 and in Section 13 will be implemented.
- Water Storage Tank

  The site benefits from a water storage tank containing approximately 15,000-20,000 litres of water, which can be used in the event of a fire and will be connected directly to the water hoses and mains water supply.
- Hydrant:
  The hydrant capable of delivering 2,500 l/min is situated on the main access road to the site as shown on the Hydrant Map within Appendix FPP3. It is our understanding that the hydrant confirms to BS750 and is maintained as required.

11.2.2 Furthermore, a Fire Tender is capable of delivering up to 6,000 litres of water at 220 l/min in a single load (through a 45mm standard jet). While the supply of water on the tender may not be available for the whole 180 minutes, on arrival onsite it will make an important contribution in the early stages of fire fighting prior to hydrant connection.

11.2.3 The provisions detailed at Table 5 can deliver the required 2,894.4 l/min as per the EA Fire Prevention Plan Guidance.

11.3 Firewater Containment

11.3.1 Resultant firewater will be contained within the permitted area, which benefits from an impermeable surfacing and via the sealed drainage system (containing approximately 20,000-40,000 litres of water) see Site Layout Plan Appendix FPP2 and the deployment of sandbags across the entrance only (approximately 20 metres). Therefore, any water deployed will be contained within the permitted boundary. The location of sandbags and the deployment line is details on the Site Layout Plan Appendix FPP2.

11.3.2 On average a 15kg sandbag is 0.33m wide x 0.77m length x 0.1m high, so 26 sandbags in all would be deployed to build across the site entrance 20 metres long x 0.1 metres high (26 sandbags end to end i.e., one layer). It is anticipated that it would take 10-15 minutes to construct the sandbag wall. A supply of at least 26 full and 26 empty sandbags will be always kept onsite. The location of sandbags and the deployment line is details on the Site Layout Plan Appendix FPP2.

11.3.3 Given the floor area of the concreted area is over 5,397 m2 and the height of 0.1 up to 5,397,000litres (5,397 x0.1 = 539.7m3) of firewater would be retained within the area if required. This does not account for evaporation, which will occur to some degree (25% allowance) and capacity of the sealed tank and associated drainage pipework and gullies.

11.3.4 Accumulated firewater contained will be removed via an authorised waste company following an incident.

11.3.5 Sandbag Monitoring & Replacement Procedures

1. Sandbags will be stacked, covered with a lid and stored undercover and a Responsible Person will monitor these bags. If necessary sandbags will be rotated (i.e. those sandbags at the bottom of the stack will be placed at the top of the stack during the course of the inspection)
2. Sandbags will be replaced as necessary as determined by the ongoing inspections.

12 Contingency Planning

Table 6: Contingency Plans

Eventuality	Procedures/Measures
Contingency Planning in the event of an incident	Measures include: - 1. The site will cease all operations and will not accept any further waste material until FRS arrives. 2. Any customers will be diverted to adjacent Operators or advised to contact the Site Office before returning to site. 3. Employees will be advised of the situation 4. Enact fire procedures as detailed within Sections 13 of this FPP. 5. The site will only reopen once FRS has advised it is safe to do so. 6. Fire damaged waste will be processed as appropriate.
Accident	Measure include: - 1. The affected area will be isolated and an appointed 'first aider' will be contacted to attend to any injured party. 2. If necessary the emergency services will be contacted. 3. A Responsible Person will decide on a case-by-case basis if cessation of operations around the affected area and reception of waste is necessary until the appropriate emergency services have arrived.
Supply Chain Failure (Including Transportation Shortages)	Measures include: - 1. Confirm current storage times for materials accumulated onsite. 2. Increase monitoring of material accumulations onsite. 3. Contact outlets for the specified stream and arrange transportation. 4. If the outlet is not receiving the specified waste stream contact other outlets. 5. Conduct investigations into potential alternative outlets, if potential outlets are not accepting specified streams. 6. Require cessation of deliveries until further notice and potential transportation to alternative sites. 7. Seek advice from EA.
Breakdowns (Mechanical Equipment)	Measures include: - 1. Immediate isolation of the affected machinery. 2. External contractors notified to complete repairs 3. Hire in relief equipment in interim if needed. 4. Reschedule material despatch to align with scheduled repairs and or relief machinery availability.
Site Closure	Measures include: - 1. Appropriate signage will be erected notifying any visitors that operations have been suspended. 2. Advise customers of the situation. 3. No more wastes will be accepted on to site. 4. Contact all potential outlets to ensure that all waste material is managed in accordance with the waste hierarchy where possible. 5. Notify EA that customers & receiving outlets have been contacted and provide scheduled dates for material removal. 6. Notify EA once stockpiles have been reduced to acceptable level

13 Fire Alert Procedures

Procedure in Event of Fire <u>on the site</u>

i. There must be no hesitation in raising the alarm. Any person discovering a fire must immediately operate the fire alarm, or (where an alarm is not provided) shout 'FIRE' to warn others in the vicinity. Fire alarms must not be used for any purpose other than as a signal for fire action or pre-arranged fire drills.

ii. Everyone must immediately leave the site and proceed directly to the designated assembly area upon hearing the alarm. The mobile plant/machine operators are, if possible, to remove their machines from the fire vicinity at that time; park and turn off their machines at a safe distance from the fire without blocking any Emergency access routes. No one is to return to the affected part of the site until it is confirmed safe to do so by the Responsible Person in charge of the premises.

iii. Contact the FRS (most senior person onsite) to alert them to the incident and give them as much information as possible about the incident.

iv. The Responsible Person in control of the site must check that FRS has been called and that a delegated member of staff knows where to direct FRS. In addition, the Responsible Person in control must check that occupants of adjacent units have been notified.

v. The Responsible Person in control of the site must ensure that the site has been evacuated and in particular: -

   1. Supervise the orderly evacuation of visitors and staff.
   2. Supervise roll calls and collect and collate information, e.g. persons not at the assembly point. Collect information about the fire location and source.
   3. Ensure first aid is given if required.

vi. On arrival FRS will take charge and the Responsible Person must co-operate with the FRS Officers. See Fire Service Act 2004 Sect. 45 for Fire Service Powers of entry.

vii. Contact neighbouring identified receptors within proximity to the site on identification of a fire & those that are contactable within a 1km radius of the facility as detailed in <u>Appendix FPP4 & 5</u> if instructed to do so by FRS (Major Incident).

14 Post-Incident Procedures

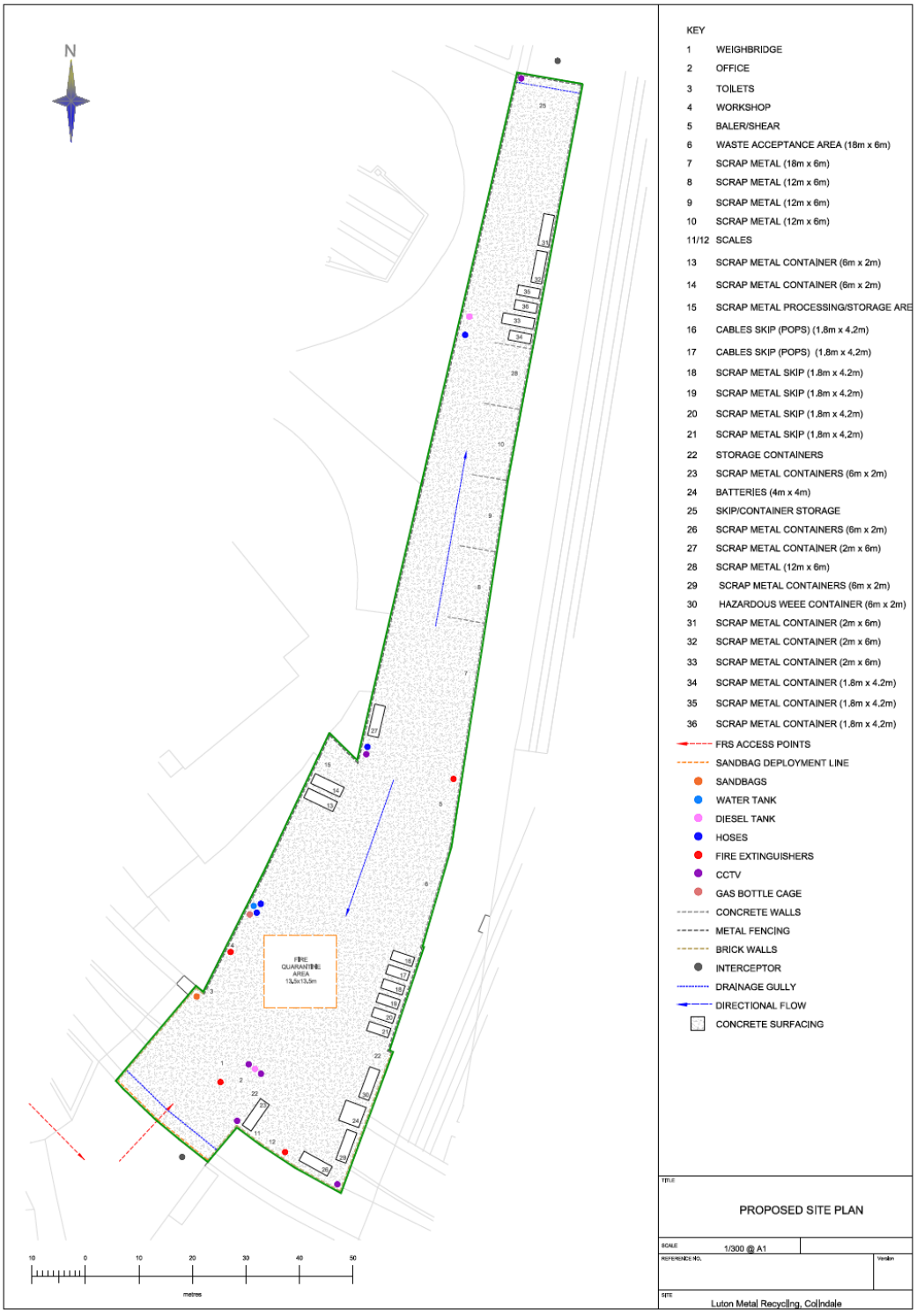
1. If required clean up contractors will pump out & remove all accumulations of firewater run off from wherever required onsite.
2. Inspection of all equipment to be conducted prior to reinstating.
3. All burnt material to be removed to an appropriately licenced disposal site.
4. Post incident reports and enquiries.
5. Notify the Environment Agency, Environmental Health and FRS that the site has been reinstated.
6. Review and update this Fire Prevention Plan in light of incident & provide a copy to any key stakeholders (EA/FRS).

Appendix FPP1: Leakage/Spillage Response Procedure

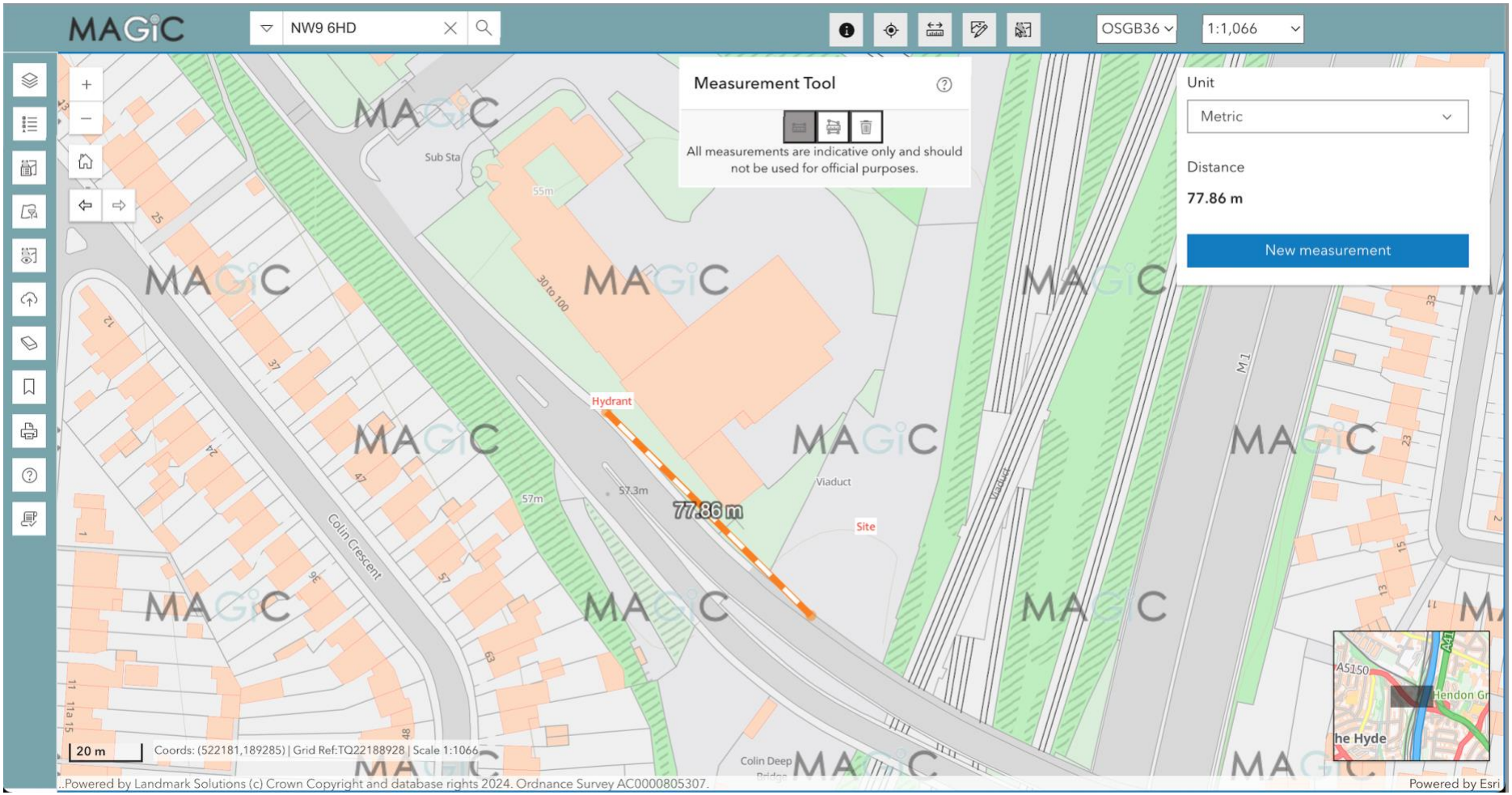
On identification of a Leak or Spillage the following procedure is to be followed to:

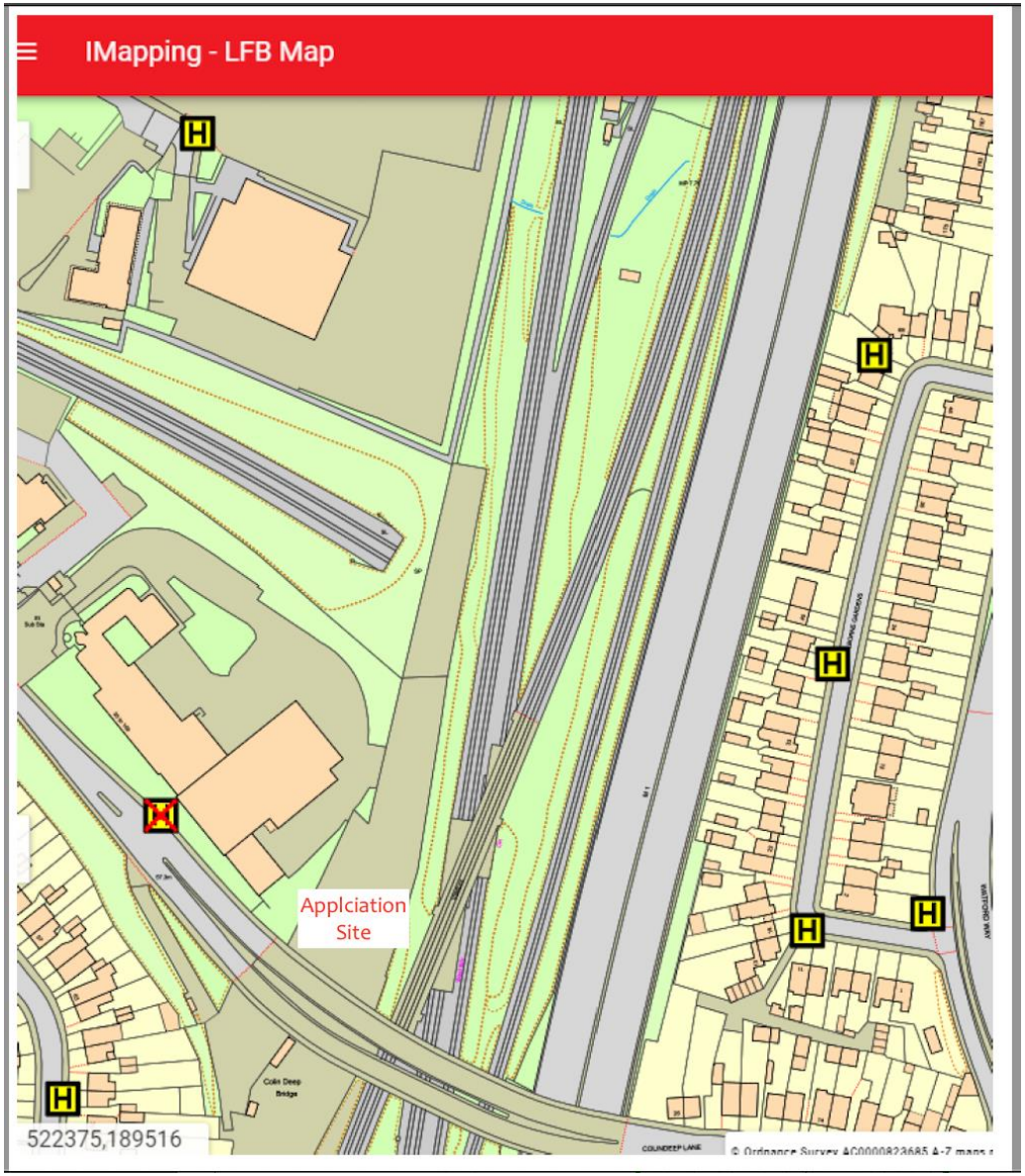
1. Prevent unauthorised access to the affected area
2. Prevent uncontrolled escape of potentially contaminating liquids using supply of absorbent materials to control the flow of liquids.
3. If safe to do so, isolate source of leak/spillage to prevent further losses, which may involve switching off a particular piece of machinery & deploying a containment vessel (i.e. drip trays) underneath the affected area.
4. If necessary initiate controlled evacuation of the site.
5. All contaminated absorbents, must be placed in a leak proof container, which is labelled & stored pending removal.
6. Seek specialist advice on decontamination of the site surfaces if necessary
7. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency via the sites Permitting Office within 24 hours. (Information at front of document)
8. Confirm site clean up with the Environment Agency. (Information at front of document)
9. Replenish supplies of absorbent materials.

Appendix FPP2: Site Layout Plan

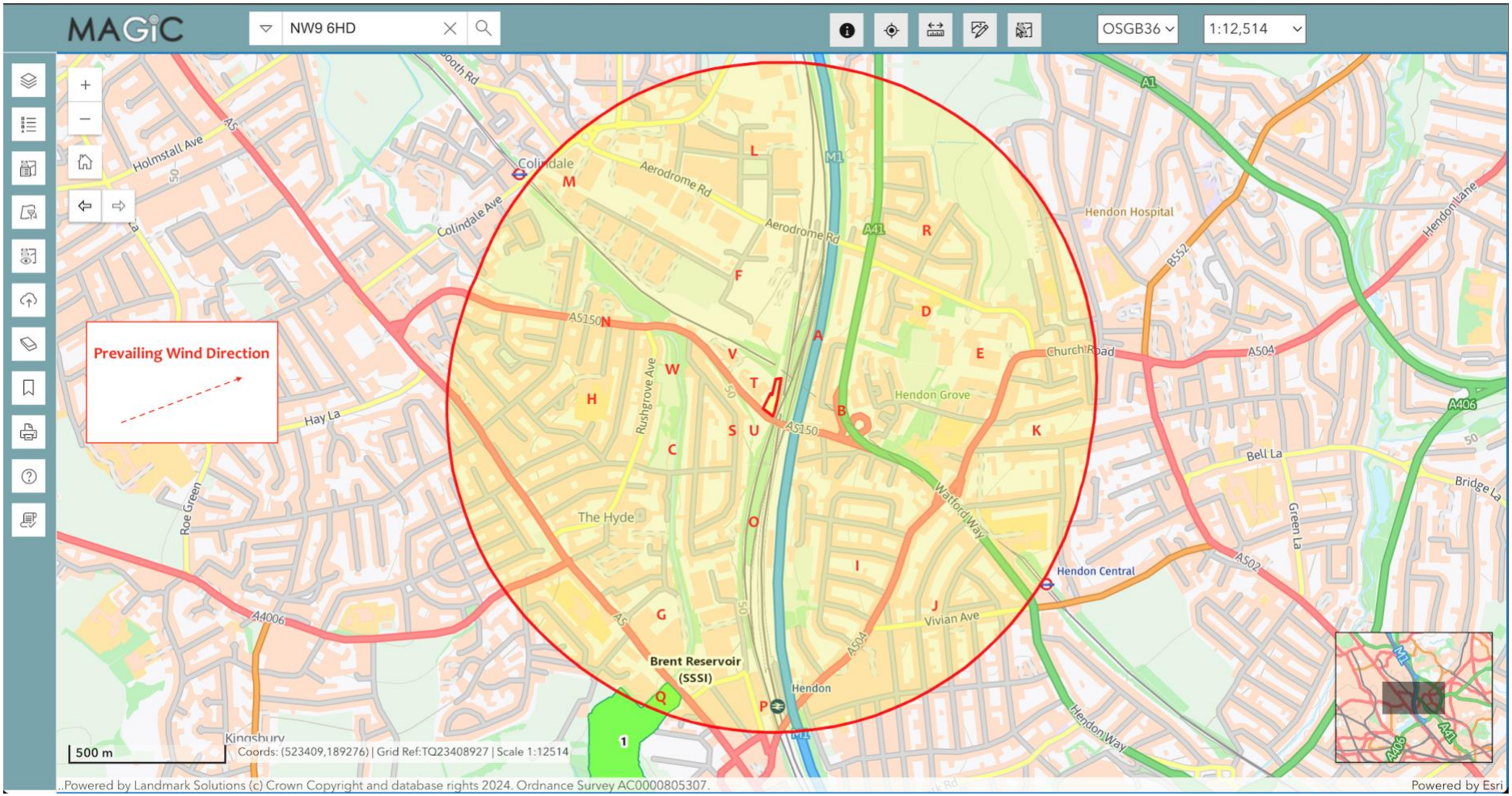


Appendix FPP3: Hydrant Map (Closest Hydrant Marked)




IMapping - LFB Map
Applciation Site
522375,189516

Appendix FPP4: Receptor Location Plan (Smoke & Fire Spreading) Scaled @ 1:25,000 (1KM Buffer).



Appendix FPP5: Receptors Identified

Receptor Reference	Receptor Description	Distance (Metres)
A	M1 Motorway	50
B	Watford Way Road Infrastructure	208
C	River Brent	344
D	Sunny Fields Primary School	536
E	Middlesex University	652
F	Commercial/Industrial Activities	385
G	Commercial/Industrial Activities	771
H	Colindale Primary School	551
I	Residential	562
J	Residential	779
K	Residential	898
L	Commercial/Industrial Activities	816
M	Barnet & Southgate College	941
N	Colindeep Lane Road Infrastructure	554
O	Railway Network	94
P	Hendon Train Station	941
Q	Brent Reservoir SSSI	900
R	Residential	744
S	Residential	100
T	Commercial/Industrial Activities	25
U	Commercial/Industrial Activities	69
V	Grammar School	162
W	Rushgate Paradise Playground	275

Risk-Assessment:

The prevailing wind direction is from the West-South-westerly so any smoke generated would be blown in a East-Northeasterly direction.

Appendix FPP6: Waste Acceptance Procedures (Extract from EMS)

14.1.1 Materials are accepted into the site both from third party deliveries and by way of collections from customers.

14.1.2 Materials collected from customer sites: -

1. When a collection is scheduled the prohibited material(s) are clearly stated & reflected in terms of collection.
2. When collecting materials, the driver will inspect to check as far as practicable for any prohibited material present.
3. If prohibited material is present, the customer will be notified and advised of the following courses of action available: -
   a) Remove material and leave at the customer's premises.
   b) Accept material and dispose of directly to a site permitted to accept the waste at the customer's expense.

14.2 Third party deliveries

14.2.1 On entering the site, waste-carrying vehicles will initially be weighed and visually inspected (if possible) by the weighbridge operator to ensure that the wastes are as described on the transfer note, are in accordance with the permitted waste types and in a condition suitable for deposit and processing in the designated area of the site.

14.2.2 Operatives are aware of permitted waste types, what the load ought to contain and whether it is suitable for deposit within the material specific Waste Acceptance Area. Any waste that Operatives are unsure of in nature will be left in situ and the advice of a member of the site management team will be sought in the first instance. In the absence of any specific guidance from the Agency, the waste(s) will be isolated (in the quarantine area) and transferred to a suitably permitted site as soon as practicable.

14.3 Ferrous Metal Acceptance Procedures

1. Ferrous metal deliveries are directed to deposit their loads within the Ferrous Metal Waste Acceptance Area.
2. Operatives inspect materials during the unloading process & once deposited within the Acceptance Area.
3. In the event of non-permitted wastes or unsuitable materials being detected during the inspection process the following procedures will be followed: -
   a) If visual inspection of waste prior to tipping identifies unsuitable wastes or items, the vehicle will not be allowed to unload.
   b) If once tipped unsuitable waste or item(s) are identified, the waste/item(s) will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
   c) Any pressurised canisters detected will be isolated, removed and stored within the Pressurised Canister (lockable) Cage.
   d) Details of all such incidents will be recorded in the Site Diary. In each case a record of the incident will be noted including time, description, and carrier. (Customers will be contacted & made aware of permitted waste types if any non-permitted waste types are identified).
4. Once the Operative has accepted the materials the delivery vehicle will be directed back to the weighbridge, for weighing and finalisation of documentation.
5. Operatives will continue to inspect all materials deposited whilst processing operations are undertaken as necessary.
6. Processed ferrous metals will be allowed to cool prior to stockpiling within the appropriate bay/container, dependent on the grade of material.
7. All materials will be inspected prior to stockpiling to ensure no non-permitted wastes are present. In the event of identification these materials will be relocated, (if necessary), isolated and stored within the non-permitted isolation facility (a skip/container).

14.4 Non-Ferrous Metal Waste Acceptance Procedure

1. Non-Ferrous metal deliveries are directed to deposit their loads within the Non-Ferrous Metal Waste Acceptance Area.
2. Operatives will inspect all materials deposited within the Non-Ferrous Metal Acceptance Area to ensure that no non-permitted wastes or unsuitable materials are present.
3. Non-Ferrous Metals are individually weighed by type & grade allowing a detailed examination of all wastes present. (Includes batteries & cables for example).
4. In the event of non-permitted wastes or unsuitable items being detected the following procedures will be followed: -
    a) If visual inspection of waste prior to tipping identifies unsuitable wastes the vehicle will not be allowed to unload.
    b) If once tipped unsuitable waste is identified, the waste/item(s) will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
    c) Details of all such incidents will be recorded in the Site Diary. In each case a record of the incident will be noted including time, description, and carrier.
5. Waste materials accepted will be stored in receptacles as specified on the Site Location Plan.
6. Operatives will inspect all materials accepted to ensure that no non-permitted wastes or unsuitable materials have been inadvertently accepted or stored. In this eventuality, these materials will be removed and if necessary isolated within the non-permitted waste isolation facility (a skip/container).

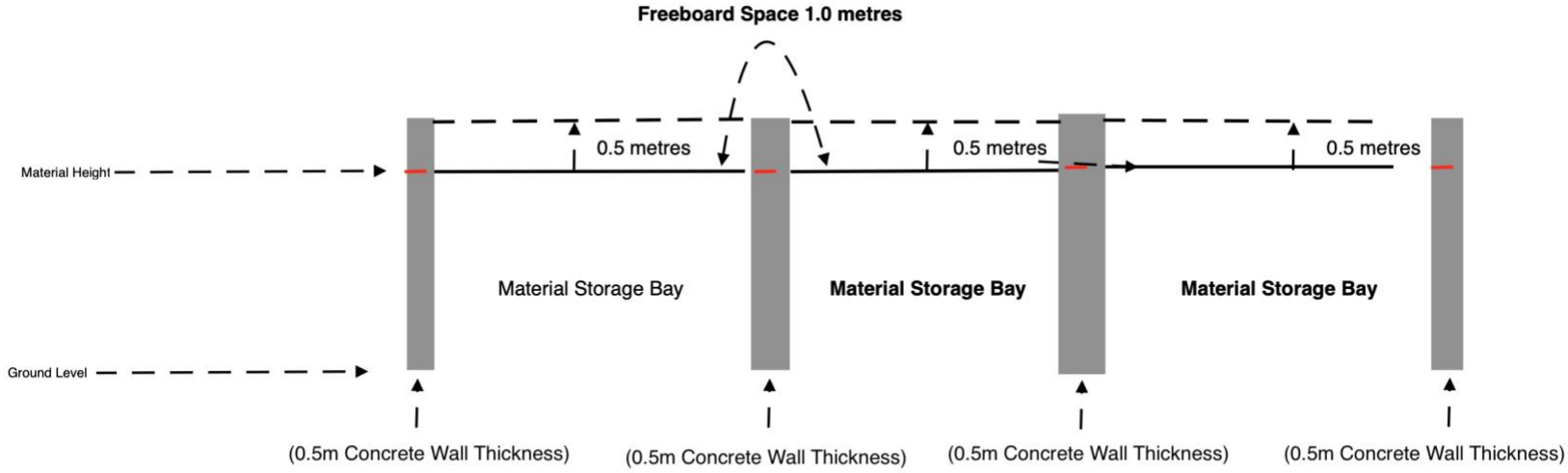
14.5 Rejection Procedure

14.5.1 Any wastes identified as being unsuitable for disposal at the site will be rejected.

14.5.2 A record will be kept of the following pieces of information:

a) Date & time
b) Person rejecting the waste(s)
c) Haulier/customer name and address including carriers' number
d) Vehicle registration number
e) Procedure name and address
f) EWC number
g) Transfer Note Number
h) Waste Description

Appendix FPP7: Material Storage Illustration



Appendix FPP7: Example Site Inspection Check Sheet (Indicative)

Luton Metal Recycling Limited	LMR-WCS-001
Inspection Check Sheet	

Date:

Weekly Inspections	Checked (A Tick For Yes & A Cross For No)
Any Emissions Present (Dust/Noise/Litter/Odour/Pests)?	
Housekeeping Standards, Ok?	
Drainage arrangements Ok?	
Access Road Clean/Tidy? (I.e., no mud/dirt present)	
Fuel Storage Area Ok?	
Site Security, Ok?	
Gas Bottle Cage, Ok? (Specify If Full & Arrange Collection/Transportation).	
Site Surfaces Intact?	
Any Spillages/Leakages? (Have absorbents been used/cleared up?)	
Any Non-Conforming Wastes Present? (Are they isolated?)	
Buildings Intact? (No Signs Of Corrosion, Loose Cladding or Damage)	
Storage Receptacles Bays/Skips/Containers Intact & Appropriate?	
Emissions Management Equipment Present & Suitable?	
Fire Fighting Equipment Present & Operational?	
Traffic & Pedestrian Segregation Arrangements, Ok?	
Health & Safety Requirements Being Followed?	
Machinery Guards Deployed & Functional?	
Mechanical Equipment Operational & Fit For Purpose?	
Signage (Correct, Current & Readable)?	
Welfare Facilities & Mess Room (Useable, Clean & Tidy)?	
Any Noticeable Hazards? (i.e., Slips/Trips/Falls Or Falling Objects)	
CCTV & Alarms Operational?	
Electrical Fittings (No Signs Of Corrosion, Wear Or Loose Wiring).	
Correct PPE Worn?	
First Aid Box/Eye Wash Station Present & Fully Stocked?	
Lighting Working Correctly?	
Equipment Inspection Spot Check Completed? (Please specify the Equipment/Operator You Have Checked At Random Below)	

Actions

Completed By: