Fire Prevention Plan

Secure Measures Marine Limited

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Helping clients prosper through compliance

SITE DETAILS

Secure Measures Marine Ltd

Manor Road,

Erith,

Kent,

DA8 2AD

OPERATOR DETAILS

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PERMIT REFERENCE

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WHO THIS PLAN IS FOR

This plan is for the Technically Competent Manager, Site staff, contractors and the local Fire and Rescue Service (FRS). A copy of this plan will be kept on site and accessible for site staff, contractors or the FRS to review.

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DRAWINGS

REFERENCE	REV	DATE	TITLE
K508.1~20~005	B	20/12/2024	Permit Boundary
K508.1~20~011	D	10/02/2026	Sensitive Receptors Plan (1 km)
K508.1~20~007	B	20/02/2026	Site Layout Plan
K508.1~20~004	B	10/02/2026	FRS Route Plan

FIGURES

FIGURE	TITLE
Figure 1	Wind Rose Indicating Prevailing Wind Directions

APPENDICES

APPENDIX	TITLE	DATE
Appendix A	Fire Drill Procedure	20/09/2024
Appendix B	Sensitive Receptors Table	25/09/2024
Appendix C	Incident Response Procedure	01/10/2024
Appendix D	General Method Statement - Health & Safety at Work	01/07/2022
Appendix E	The Health & Safety Policy v1	01/04/2023
Appendix F	Pre-tow checklist	

1. INTRODUCTION

1.1. Scope

This Fire Prevention Plan (also referred to as an FPP) is intended as a working procedure document to prevent and limit the causes of fire and to mitigate the impacts of fire should one occur. It is applicable for the identification of potential fire risk and sets out mitigation measures to reduce potential fire risks associated with the acceptance and dismantling of boats at Secure Measures Marine Limited, Manor Road, Erith, Kent, DA8 2AD.

This Fire Prevention Plan was prepared by Wiser Environment Limited to ensure that all operations at Secure Measures Marine Limited meet the requirements of the Environment Agency's GOV.UK guidance 'Fire prevention plans: environmental permits[1]' (updated 11th January 2021).

This FPP applies to everyone on site:

- Site Management.
- Technically Competent Manager.
- Trained Site Operatives.
- Visiting Contractors; and
- Emergency Services.

This Fire Prevention Plan accompanies the application for a Bespoke Environmental Permit at Secure Measures Marine Limited, Manor Road, Erith, Kent, DA8 2AD.

A hard copy of this FPP will be displayed in the office on site and all staff shall be made aware of the measures outlined in the FPP. Required training of the related procedures shall take place and in the case of an emergency, the FPP shall be presented to the Fire Rescue Service upon arrival to site.

1.2. Site Location

The site is located at Secure Measures Marine Limited, Manor Road, Erith, DA8 2AD with National Grid Reference TQ 52206 77922. The permit boundary is shown on K508.1~20~005 and the site location is shown on drawing K508.1~20~011 Sensitive Receptor Plan (1 km).

Site operations include boat breaking and associated activities. The main operational area is based on a steel pontoon (40 m x 9 m) with a floating dry dock (40 m x 12m) sitting on the

[1] Fire prevention plans: environmental permits - GOV.UK Updated 11 January 2021

riverbed at low tide or floating on the River Thames at high tide at Anchor Bay Wharf adjacent to the town of Erith.

The site area is approximately 0.45 ha and operates during the daytime between 7am - 4pm (Monday – Friday) and 7am - 12pm (Saturday). Site access is off Manor Road and is connected to the riverbank via a footbridge (see Site Layout Plan K508.1~20~007).



Figure 1: Permit boundary of the site shown in Green

2. TYPES OF COMBUSTIBLE MATERIALS

2.1. Combustible Waste

The sole purpose of the site is dismantling boats (also referred to as vessels). Only end of life Vessels are accepted on site. The vessels accepted at the site are predominantly barges and houseboats, which account for approximately 80-90% of all vessels received. The remaining vessels include occasional tugs, floating piers, link spans, and hulks. Vessels accepted on site are not flagged, although some may arrive coded which is entirely different from being flagged. The types and characteristics of vessels received vary; however, barges and houseboats constitute the vast majority of incoming vessels.

All wastes received are subject to extensive pre-tow surveys as well as pre-acceptance and acceptance checks prior to being unloaded (see Section 8). During the waste acceptance checks any non-conforming waste will be rejected and kept in the quarantine area which is marked on the Site Layout Plan K508.1~20~007.

Table 1: Combustible Waste

Waste Description	LoW	Details
End-of-life vehicles	160104*	Only de-polluted end of life vessels is accepted on site; the business specialises in boat breaking. No other type of EoL vehicle is accepted on site.
End-of-life vehicles, containing neither liquids nor other hazardous components	160106	

2.2. Other Combustible Materials (Non-Waste)

- COSHH Store
- Lubricating Oils stored on site
- Gas canisters

2.3. Persistent Organic Pollutants

Wastes containing Persistent Organic Pollutants (POPs) are not accepted at the site.

3. USING THIS FIRE PREVENTION PLAN

3.1. Location

A hard copy of the plan shall be readily available at the site office (Secure Measures Marine Limited, Manor Road, Erith, Kent, DA8 2AD) during operational hours and is available on request to visitors and contractors.

3.1. Where the Plan is Kept and How Staff Know How to Use it

The plan will be kept in a visible area at the site office. All staff are to read the FPP as part of their induction and sign a training log to confirm that they have read and understood the details of the plan. Any changes to the plan shall be communicated to staff via training. Visitors and contractors are given a brief overview and key fire related measures such as the evacuation muster point and the location of any fire extinguishers in their work area. If their visits extend over considerable length of time or on a regular basis, then they will be encouraged to read the plan in full and sign the training log. Emergency services will be allowed immediate access to the plan, and further hard or digital copies can be made available if required.

3.2. Testing the Plan and Staff Training

Evacuation drills will be conducted monthly at the discretion of the Site Management in accordance with the Fire Drill Procedure (Appendix A) and are recorded in the site diary. Any issues will be addressed through site meetings and further refresher training, where necessary. Safety inductions and competency cards will be issued where applicable. Employees involved in site works will undertake Health and Safety (including Environmental) training pertinent to their roles, such as Construction Skills Certification Scheme (CSCS) & Electrotechnical Certification Scheme (ECS), to align with site-specific requirements. Safety briefings are given to all employees before commencing work.

3.3. Activities at the Site

The sole purpose of the site is dismantling of end-of-life boats.

The operator receives boat carcasses (vessels) that have been decommissioned and need dismantling for recovery of the metals.

The boat dismantling process takes place fully within the floating dry dock sitting on the River Thames.

The depollution and dismantling equipment, mobile plant (360 excavator and grab), workshop and welfare facilities all sit on the 40 m x 9 m steel pontoon. The structure is surrounded by water and connected to the riverbank by a footbridge.

3.3.1. Floating Dry Dock

A floating dry dock consists of a vessel that can be used to float a load (in this case another vessel) so that the load can be drained and rested on a dry platform, where it can be worked on.

The walls of dry docks can be filled or emptied of water by operating a valve: vessels can be manoeuvred into the dry dock while it's filled with water (i.e. sunk), the dock is then drained so the vessels rests on a dry platform.

The vessels arrive on site already depolluted (oil and fuel removed) prior to being towed to the site. The removal of any residual liquids or oils from the vessels and the cutting of metal are all carried out within the floating dry dock. The dry dock will be visually inspected for any traces of residual oils, fuels or bilge. Absorbents and spill kits are located within the dry dock to soak up and clean any residual pollutants before water is pumped out of the dry dock into the river. The dock is then cleaned thoroughly and any residual liquids and any dirty water within the dry dock is pumped into and collected in the 6 x 1000 litre IBCs on the pontoon. The IBCs are stored within a bunded containment area formed from a tank that has been cut in half. This arrangement ensures that any spills or contaminants are contained, preventing pollution of surface water and the river.

The dirty water in the IBC is then taken off site by appropriate contractors and disposed of at a licenced facility. The IBCs are watertight and all storage vessels are kept in a bunded area and visually checked weekly for any leaks.

3.3.2. Steel Pontoon

The steel pontoon is only used as an area for equipment and temporary placement of the cut steel panels prior to transfer to the neighbouring permitted EMR facility. Scrap metal is unloaded from the pontoon as it is produced and is removed by a 360 grab within 24 hours at the latest. Skips are positioned on the pontoon to contain any scrap metal cuttings that might be dropped on the pontoon to minimise the risk of diffuse pollution entering the river.

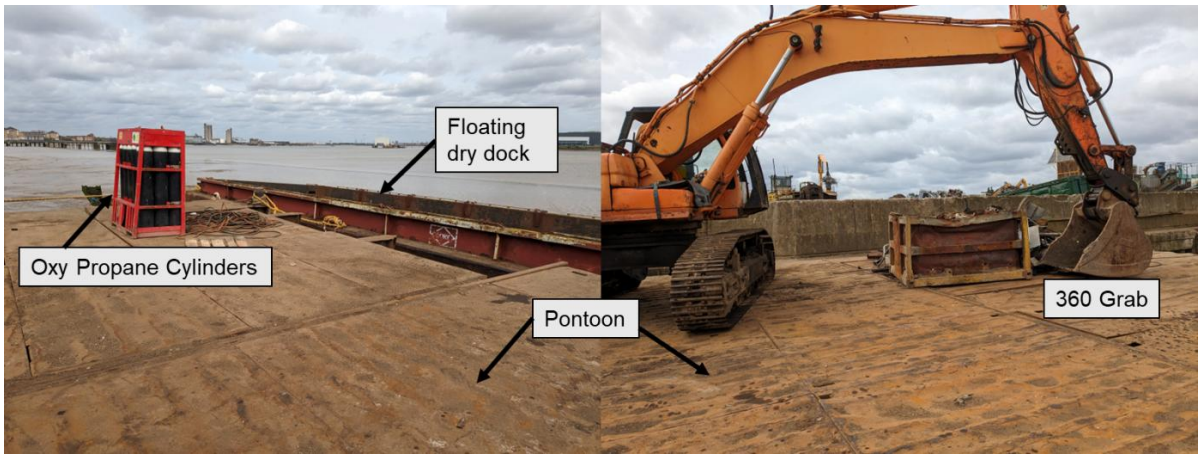


Figure 2: Pictures of the floating dry dock, pontoon and 360 grab

3.3.1. Unloading of Scrap Metal

The operator registered a T9 waste exemption for recovering scrap metal (WEX394686), which specified the site as being part of European Metals Recycling's Manor Road Facility (EPR/FB3509MJ). Following a visit by the EA on 1st July 2025, the T9 exemption was deregistered and all activities under the T9 exemptions were stopped.

SMM's relationship with the EMR facility is limited to and includes only access and egress via the EMR site. The EMR buys all the scrap metal from SMM. SMM is the competent body and there is no potential for a multi operational facility with the EMR site.

The EMR (Manor Road Facility) is adjacent to the west of the site and is the sole offload point of the scrap metal produced by SMM.

3.3.2. Port of London Authority Licence

SMM hold a Port of London Authority Licence (PLA No. 126.1579). This licence regulates the activities that can be undertaken at the site. The PLA licence does not allow any scraping, cleaning or painting of vessels or any potentially polluting activity to be carried out unless these activities are taking place in the dry dock barge. The dry dock barge acts as secondary containment to avoid any potentially polluting substances from being released to controlled waters. The dry dock barge is cleaned between vessel cuttings and any residual rain or dirty water in the barge is pumped into the 6 x 1000 litre IBC which are emptied by a contractor into the appropriate waste facility.

The Port of London Authority Licence requires the operator to:

- Collect, contain and dispose of all waste at appropriately licenced facilities, records of the facilities and contractors used must be kept.
- Dispose of sewage from the vessels moored and the black water holding tanks in the pontoon barges to facilities onshore.

- Store all oils, chemicals and other industrial liquids in suitably bunded designated storage tanks and appropriate storage containers.
- Regularly sample the sediment to check for contamination.

4. PLAN OF SENSITIVE RECEPTORS NEAR THE SITE

Sensitive Receptors are shown on the Sensitive Receptor Plan K508.1~20~011 and in the Sensitive Receptors Table ERA2 (Appendix B). The sensitive receptors displayed are in all directions. The closest observing station where weather data from the previous 5 years (2019 - 2024) was taken is Kenley, (approximately 27 km WSW of the permit boundary). Figure 3 below shows the wind rose which indicates that the prevailing wind is predominantly from the West Southwest. The sensitive receptors located towards the Northeast of the site are potentially at greatest risk from hazards transmitted through the air.

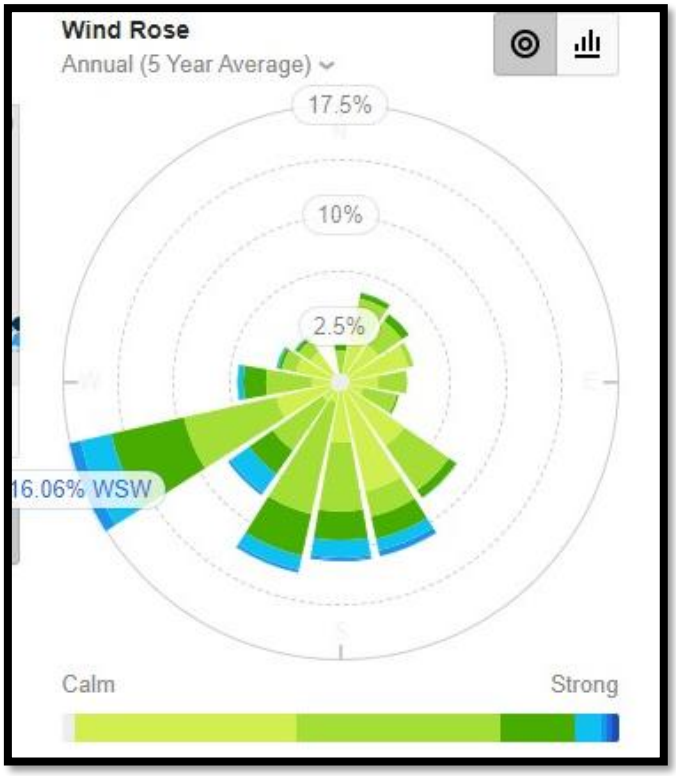


Figure 3: Wind rose indicating prevailing wind directions in percentage (%). Kenley, Slade Green wind rose. Annual 5-year average, from 2019 -2024 (willyweather.co.uk).

5. MANAGE COMMON CAUSES OF FIRE

5.1. Arson

At SMM, physical barriers, and strict access controls have been put in place to monitor and secure site entry points. These measures help safeguard facilities and vessels against potential security risks such as arson and theft. Other security measures include maintaining safe access and egress and ensuring warning signs and other explanatory and safety signs are posted in visible locations.

5.2. Plant and Equipment

The main operational equipment used at SMM for boat breaking fall under the following categories:

- Lifting equipment;
- Mobile plant and equipment;
- Compressed air and gases; and
- Oxy Propane cutting equipment and gas
- Excavator with various attachments: shear, selecta grab, 5 tine grab and bucket.
- Mini digger with attachments, hammer, bucket etc.
- Petrol driven disc cutter.
- Petrol driven chainsaw
- Various hand tools.

All the equipment on site is maintained regularly. Proper handling and storage of hazardous materials is maintained, and staff training is undertaken to ensure competent operation of the equipment and to reemphasise oil spill prevention methods and quick response techniques in case of a fire.

For Tools & Equipment, according to *General Method Statement - Health & Safety at Work*, July 2022 (Appendix D), SMM will work to the following procedure.

- Oxy/Propane bottles will be supplied from British Oxygen Company (BOC) (single bottles on trolley to be used); and
- Oxy/Propane cutting equipment and any other required equipment necessary for the job to be supplied by Secure Measures Marine Limited.

Regular inspections are conducted to assess equipment integrity and functionality, with any defects promptly addressed through maintenance protocols. Detail procedures on maintenance and decontamination of tools and equipment is presented in (Appendix E) the Health & Safety Policy v1 dated 01/04/2023.

Where equipment is hired it must be suitable and sufficient for the work i.e. the right equipment is being hired and that it is fit for use (e.g. tested and inspected).

It must also be confirmed that any operator supplied with equipment is competent.

No employee may use plant or equipment without being trained and passed as competent and be under supervision.

5.3. Electrical Faults Including Damaged or Exposed Electrical Cables

Any electrical faults noticed on site during normal inspections or throughout the working day are reported and isolated. A qualified electrician will be called to resolve the problem. If required, the electrical unit shall be switched off at the fuse box to prevent the risk of ignition.

5.4. Electrics Certification

All employees of SMM involved in site work must undertake health and safety trainings such as CSCS (Construction Skills Certification Scheme) & ECS (Electrotechnical Certification Scheme) certifications to align with site – specific regulations.

All operatives are trained on safe welding practices and have been awarded certificates from the National Demolition Training Group in the following areas:

- Level 1: Safe use and operation of oxy-fuel gas cutting and heating equipment course.
- Level 2: Dismantlers oxyfuel cutting course.

All equipment used at SMM meet the standards required by the regulations: Electricity at Work Regulations (EAW) & the Provision and Use of Work Equipment Regulations (PUWER).

5.5. Electrical Equipment Maintenance Arrangements

Inspection, testing and maintenance of all electrical equipment is done annually by a competent person.

Electrical equipment is visually inspected quarterly by the responsible Manager or competent person.
Class 1 equipment (with an earth wire) is PAT (Portable Appliance Test) ‘tested’ 6 monthly or as assessed.
Records of formal inspection is maintained (on the company pro-forma, or as supplied by the tester).

5.6. Smoking on Site Policies

The Health Act 2006 prohibits smoking of any substance in any enclosed premises, fixed or temporary – including marquees. The site operates by this policy. Smoking is prohibited in any

area where there may be risk of fire or explosion e.g. areas signed as “No Smoking – Highly Flammable Liquids”.

The no smoking policy is emphasised to all employees and visitors (as appropriate). Vaping is prohibited in any area where there may be flammable or higher rating gases, vapours or similar (electric smoking/vaping gadgets are not intrinsically safe in these areas). Disciplinary measures will be taken against any employees not complying with this policy. No smoking signs will be affixed at the entrances to enclosed workplaces as required by the UK Health Act and Regulations.

5.7. Hot Works Safe Working Practices

SMM ensures that the Supervisor, the Project Manager or the competent person appointed is in control of the Permit to Work procedure and will issue/close each permit issued during the following activities:

- Electrical work;
- Work in confined spaces;
- Mechanical work; and
- Welding or other hot work.

Oxy Propane is used during the cutting process during boat dismantling. SMM ensures that all burners are safe and competent regarding the use of oxy propane cutting and burning equipment. All burners used by Secure Measures Marine are trained in the safe use and practice of oxy propane cutting. All burners used in burning works must pass the required standard, set by Weld Care.

SMM ensures that safe working practices are maintained, with regards to, cylinder types and their identification, types of equipment and their relevant safety devices, equipment assembly and testing procedures, action to be taken if an equipment is unsafe, lighting up and shutting down procedure. Safe Method Statement for General Site Oxy Propane Cutting is detailed in the SMM *General Method Statement - Health & Safety at Work*, July 2022 (Appendix D).

Burning areas are clearly marked to prevent hazards to current staff, visitors and pedestrians.

Full PPE and heat protection to be always worn during cutting. The advised PPE must be worn when moving around site - eye protection, hard hat, safety boots and high visibility clothing. PPE must be worn when conducting hot work – fire retardant overalls, ear defenders, hard hat, visor (down when cutting), safety glasses (for when assessing site etc.), safety boots (steel toe cap, metatarsal and mid-sole protection), gauntlet style fire retardant gloves, mask with filters. Fire Watch procedures should be followed. Sparks should be controlled during welding, and any areas damped down if necessary.

Burning will cease at least one hour before site is vacated, all loose material will be removed, and site left in a clean and tidy state subject to inspection by the customer representatives.

6. FIRE WATCH PROCEDURES

Precautions must be taken to observe the general condition on site. This includes (wind direction, type of building, escape routes, position of fire alarms and telephones). Flammable substances should be covered with flame retardant sheets. Firefighting equipment such as fire extinguishers and hydrants must be nearby, and site staff must know where they are located. The site supervisor must conduct daily start and end of the day checks to ensure that the fleet and the security of the site is intact. On encountering a fire, employees must raise alarm as a matter of priority. Employees must not put themselves in any danger to fight a fire but should preferably withdraw to save life or to avoid any serious injury.

6.1. Fire Watch during Burning & Cutting

Secure Measures Marine Limited will work to the following procedure:

- During the whole task operatives using oxy-propane cutting equipment will follow fire-watch procedures and will damp down any areas required.
- A minimum of 1,000 litres of water in a suitable container (bowser) will be made available for use for damping down of potential ignition points.
- All work will be halted a minimum of one hour before staff leave site and an inspection will be carried out before they leave.
- Loose materials will be removed, and the area will be fire inspected before leaving site.
- Any potential fires found will be doused with water to extinguish.
- A suitable number of extinguishers are available for use.

7. IGNITION SOURCES

7.1. Batteries

Batteries are removed from the vessels as part of the depollution process prior to delivery to SMM. Operations at SMM do not involve handling or storing batteries.

7.2. Leaks and Spillages of Oils and Fuels

Vessels are depolluted (all oil and fuel are removed) prior to being towed to site but residual fluids such as fuel and oil may remain in the boats which are then drained and transferred to the site's double bunded fuel and oil tanks. Absorbents and spill kits are located within the dry dock to soak up and clean any residual pollutants before water is pumped out of the dry dock into the river.

A 150 m containment boom will also be installed around the perimeter of the site permit boundary to contain any potential contaminants arising from SMM's operations and prevent them from leaving the permitted area (See drainage and water management plan (K508.1~20~008)). While the operator cannot prevent third-party vessels from navigating or mooring within this section of the River Thames, the perimeter boom will also provide a degree of protection against contaminants originating from other vessels in the vicinity, helping to minimise the risk of pollution entering the waters within the permitted boundary.

Any liquid wastes including oils, chemicals and other industrial liquids are stored in the bunded designated storage tanks and appropriate storage containers, away from vehicular movements. Spill kits will be made available for deployment in the proximity should a spillage occur. Any leaks or spills will be recorded in the daily site diary. Incident Response procedure will be followed (see Appendix C).

7.3. Build-Up of Loose Combustible Waste, Dust and Fluff

The build-up of dust or loose material is not generally a risk to operations at SMM, but there is a possibility of accumulation of localised dust on buildings and materials. Precautions will be taken to protect site visitors and workers form dust and fluff. Regular cleaning is carried out at SMM to minimise the build-up and accumulation of dust.

7.4. Reactions Between Wastes

The only waste treated at site is end of life vessels to produce scrap metal. The metal cut from the vessels is in large 3 m panels. Reaction between waste is not a risk in this process. A quarantine area has been identified on the pontoon in case of unexpected non-conforming waste. Any residual waste from recycling activities is managed in an environmentally safe and controlled manner.

Scrap metal cuttings are generally transported directly from the dry dock, over the wall, to the EMR facility using a 360° grab. Skips are positioned on the pontoon to contain any scrap metal cuttings that might be dropped on the pontoon to minimise the risk of diffuse pollution entering the river. Sheared metals are generally transferred to the EMR facility within 24 hours of processing.

8. ACCEPTANCE OF VESSELS ON SITE

Ensuring the safety of vessels upon arrival is paramount to operations at SMM, hence standard procedures for secure docking of boats on site have been put in place. Trained personnel and specialised equipment are available to guide vessels on arrival, while advanced mooring systems tailored to each vessel ensures secure docking. These measures guarantee the safety and integrity of vessels throughout their stay, facilitating efficient and reliable recycling operations.

Before accepting any boats at the site, the operator will commission a pre-tow survey, to check the status of the boats and determine if they can be repaired and re-saleable in the market. Any vessel that is towed must have an MCA load line exemption or a PLA pre-tow survey. Part of the pre-tow survey will be carried out by SMM's clients and will determine the contractual terms of sale. A copy of the pre-tow checklist is shown in Appendix F.

Vessels accepted on site are not flagged, although some may arrive coded which is different from being flagged.

Once sold to the operator, the vessels will be depolluted (all oil and fuel removed) off-site, prior to be towed to the operator's site. At the operator's site, further checks are carried out to establish the status of the vessel.

The vessels remain non-waste until a decision has been made to dismantle them (i.e. the intention is of discarding it).

During high tide, work will begin on the vessels.

The main stages of the process are:

- **Draining of residual fluids (if needed):** although depolluted prior to delivery, residual fluids such as fuel and oil may remain in the boats. These oils are then drained and transferred to the site's double bunded fuel and oil tanks.
- **Oxy fuel cutting of main boat structure:** the boats are cut into metal "chunks" using oxy propane equipment. The scrap metal pieces vary in size and may go up to approximately 3m in length and width. The scrap metal is temporarily dropped onto the main processing area (the pontoon).
- **Scrap metal transfer:** the scrap metal is transferred to the adjacent EMR site using a 360 grab which sits on the pontoon. The EMR grab deposits the metals into the EMR site.

The process has the following key characteristics:

- It is weather dependent: for health and safety reasons, the process cannot be carried out in adverse conditions such as high winds or ice.
- It is a tidal process, which relies on the high tide to have the site features and boats floating.
- The process is only carried out in daylight hours.
- Dismantling of one vessel typically takes 3 to 6 weeks, subject to the conditions mentioned in the bullet points above.
- The facility will not process more than 25,000 tonnes of waste per year.
- There are no emission points from the operation.

Table 2: Waste Acceptance Procedure

WASTE ACCEPTANCE PROCEDURE	SPECIFIC STANDARDS
Waste Inspection	Secure Measures Marine Limited operatives will monitor the site, their projects and equipment using the 2-minute risk assessment sheets and pre-use check sheets. Before any vessel is accepted on site, the operator will commission a pre-tow survey, to check the status of the vessel and determine if the boat can be repaired and re-saleable in the market. Part of the pre-tow survey will be carried out by SMM's clients and will determine the contractual terms of sale.
Quarantine Storage and Waste Which are Reject	The metal cut from the boats is in large 3 m panels. Reaction between waste is not a risk in this process. A quarantine area has been identified on the pontoon in case of unexpected non-conforming waste. SMM's facility ensures all non-hazardous wastes are managed safely and environmentally soundly. SMM has robust processes and control procedures in place for their removal, storage, and treatment.
Identification of Wastes	SMM follows stringent processes which includes use of labels and signage, proper materials storage, and segregation techniques to prevent contamination.
Inspection of Waste	A pre-tow survey is carried out to check the status of the boat; further checks are carried out at the operator's site to establish the status of the vessel.

9. HOT AND DRY WEATHER

Visual inspection and more frequent temperature monitoring during operational hours will help identify hot spots.

9.1. Prevent Self-Combustion

Self-combustion is highly unlikely due to the nature of the waste (mainly ferrous metal panels) and short storage timescales on site (typically 12 – 24 hours). During metal cutting, the oxy propane flame may encounter flammable paints and coatings that may be on the metal surfaces. The procedures for managing highly flammable paints and coatings, as well as those releasing toxins during cutting, are carefully executed. Strict adherence to safety protocols will minimise any risks. These include specialised handling and storage techniques to prevent ignition or release of toxins. All personnel handling combustible materials will undergo thorough training on proper handling and disposal procedures for such hazardous materials.

10. GENERAL SELF-COMBUSTION MEASURES

Metal cuttings are kept on site for a maximum of 24 hours. Site staff will remain vigilant for any signs of combustion from waste piles on site.

Daily checks are made on the site as part of the fire watch procedure.

Safe work with Compressed air and gases follows *General Method Statement - Health & Safety at Work*, July 2022 as below:

- Gas equipment must be checked every day for leaks.
- Each cylinder is correctly labelled, identifying gas and pressures.
- Regulator is designed for gas and pressure used (never use the wrong regulator for example oxygen for nitrogen)
- Flashback arrestors must be fitted.
- Hose check valves must be fitted to hoses at torch end.
- Hose connections are crimp fittings; there should be no more than three authorised repairs on any hose line.
- During use, all bottles must be vertical and fixed.
- Cylinders and gases must be stored in a vertical position and in a safe area.

11. MANAGE STORAGE TIME

Table 3: Storage Times

WASTE DESCRIPTION	LoW	MAX. STORAGE TIME ON SITE	MAX. STORAGE LIMIT ON SITE
End-of-life vehicles	16 01 04*	24 hours	The amount of hazardous waste stored on site at any one time shall not exceed 50 tonnes.
End-of-life vehicles, containing neither liquids nor other hazardous components	16 01 06	24 hours	

The site is permitted to receive a maximum capacity of 25,000 tonnes of waste per annum.

11.1. Method Used to Record and Manage the Storage of All Waste on Site

SMM maintain documentation of all waste generated throughout the process. Comprehensive records on types and quantities of waste produced, as well as the storage techniques used to ensure safe handling and containment are kept. Furthermore, SMM keep track of the destination of all waste streams, ensuring that they are only transported to facilities that are authorised to accept each waste type.

11.2. Stock Rotation Policy

Not applicable, as no stock is maintained on site beyond 24 hours.

12. MONITOR AND CONTROL TEMPERATURE

12.1. Reduce the Exposed Metal Content and Proportion of 'Fines'

Metal cuttings are removed within 24 hours.

12.2. Monitoring Temperature

Visual inspections of the waste happen throughout the working day.

12.3. Controlling Temperature

Metals produced are removed within 24 hours.

12.4. Dealing with Hot Weather and Heating from Sunlight

Metals produced are removed within 24 hours.

Operations are not carried out in adverse weather which includes high temperatures and icy temperatures.

13. MANAGE WASTE PILES

13.1. Storing Waste Materials in their Largest Form

Metal cuttings are only on site 12 - 24 hours before being moved to permitted EMR facility.

13.2. Maximum Pile Sizes for the Waste on Your Site

Table 4: Pile Sizes

Waste Description	Location	How it is Stored	Max. Length (m)	Max. Width (m)	Max. Height (m)	Volume (m^3)	Max. Time stored
End-of-life vehicles	Main processing area (the steel pontoon)	Stored in EMR facility	3 m	3 m	2 m	18 m^3	12 - 24 hours before being moved to EMR facility.
End-of-life vehicles, containing neither liquids nor other hazardous components	Main processing area (the steel pontoon)	Stored in EMR facility	3 m	3 m	2 m	18 m^3	12- 24 hours before being moved to EMR facility

13.3. Waste Stored in Containers and Types of Containers

Not applicable, no waste is stored in containers.

13.4. Accessibility of Containers

Not applicable, no waste is stored in containers.

13.5. Moving Containers in a Fire

Not applicable, no waste is stored in containers.

14. PREVENT FIRE SPREADING

14.1. Separation Distances

Oxy – propane cutting and burning areas are situated within the dry dock at a safe distance from any dangerous operations, falling, tipping or flammable hazards. The burning area must not be in an area of heavy traffic movement and must be kept clean and tidy, without flammables or contaminants.

14.2. Fire Walls Construction Standards

Not applicable, no waste is stored in containers.

15. STORING WASTE IN BAYS

Not applicable, no waste is stored in bays.

16. QUARANTINE AREA

16.1. Quarantine Area Location and Size

In accordance with the guidelines set out by the Environment Agency, a quarantine area that can hold up to 50% of the largest waste pile on site is required.

However, in this case the dry dock is the only area where waste is treated, and it has the capacity of containing the fire. Therefore, a quarantine area is deemed not suitable on the dry dock. A quarantine area has been identified on the pontoon in case of unexpected non-conforming waste this is shown in the site layout plan (K508.1~20~007).

16.2. How to Use the Quarantine Area if there is a Fire

Only one vessel is treated at any time, therefore, in case of a fire, burning waste and non-burning waste will not be moved.

An area of the pontoon has been identified for quarantining of non-conforming waste that may arise during treatment of the vessels.

16.3. Procedure to Remove Material Stored Temporarily if there is a Fire

Materials are stored on site for not more than 24 hours. Materials are transferred to the permitted EMR facility using a 360 excavator and grab.

17. DETECTING FIRES

17.1. Detection Systems in Use

Site supervisors and staff monitor the operational areas regularly to ensure that any fire outbreak is detected quickly. Employees must know the position of fire alarms and telephones and must immediately raise an alarm and call assistance (this is the priority) if they come cross a fire.

17.2. Certification for the Systems

Fire alarms are installed on site and undergo weekly testing and are maintained according to the relevant British Standards BS5839-1.

17.3. Accidents

All accidents must be reported to both Secure Measures Marine and site management, no matter how minor.

In the event of an accident in the burning area, Secure Measures Marine operatives should immediately contact the site management and first aider.

Secure Measures Marine operatives must be aware of first aid procedures and facilities on site.

18. SUPPRESSING FIRES

18.1. Suppression Systems in Use

There are 6 fire extinguishers strategically placed within the welfare and storage facility on site. These shall be utilised as a first response if safe to do so. All fire extinguishers on site are maintained in accordance with manufacturer's guidance and checked as part of daily site inspections. If used, an extinguisher is replaced following the fire event. All site staff involved in the handling and processing of waste are trained in the use of fire extinguishers.

The primary fire suppression system in a larger scale event would be the fire hydrant (4 Fire hydrants are located within reach of the site on Manor Road). The site is also located on the River Thames, a potential significant source of water in case of a fire. The FRS would be contacted in the event where a larger scale fire is discovered, and it is not safe to tackle with extinguishers on site. In the incident that a fire occurs out of hours the FRS shall be contacted in the first instance.

18.2. Certification for the Systems

Fire extinguishers are maintained according to relevant British Standards BS5306 or equivalent, to ensure that during an emergency it is available for use. The fire hydrants are maintained by Thames Water and serviced at regular intervals, in accordance with the relevant BS750 standard or equivalent, to ensure that during an emergency it is available for use.

19. FIREFIGHTING TECHNIQUES

19.1. Initial Response

The aim of the initial response is to extinguish a fire in its earliest stage before it can take hold, using the in-situ fire extinguishers which are placed at key locations within the site welfare facilities and store. All site staff will be made aware of the locations for fire extinguishers.

19.2. Active Firefighting

Fire extinguishers are kept in accessible areas across the site, and their locations are marked on the Site Layout Plan (K508.1~20~007). Site staff are aware of the locations of the fire extinguishers. It is mandatory that all staff working within the burning and cutting area must wear the following PPE when conducting hot works - fire retardant overalls, ear defenders, hard hat, visor (must be kept down when cutting), safety glasses, safety boots (steel toe cap, metatarsal and mid-sole protection), gauntlet style fire retardant gloves, mask with filters. Upon detection of a fire, only if safe, the burning or smouldering material will be extinguished in-situ, by trained staff members using the extinguishers. If it is not safe to fight the fire in-situ, the materials will be isolated from the rest of the pile and moved to the quarantine area for extinguishing. If it is not safe to tackle the fire, the Fire Rescue Service will be called, and the burning material will be left within the storage areas.

19.3. Fire and Rescue Service Strategies

In the event of a fire, the Fire Rescue Service will have access to the site via Manor Road and the site entrance (see Fire Service Route Plan K508.1~20~004) and may consider the following strategies.

19.3.1. Early Intervention

- Apply water to specific burning areas of small, localised fires.
- Isolate material to a quarantine area for spreading out and cooling with water.

19.3.2. Out of Hours

Should a fire be discovered out of hours, the Fire Rescue Service shall be notified as well as nominated site personnel. Site managers will be notified through the CCTV and remote access of cameras system.

20. WATER SUPPLIES

20.1. Available Water Supply

A standard procedure during burning and cutting is to have a minimum of 1000 litres of water available in a suitable container (water bowser) for damping down potential ignition points (See site layout plan (K508.1~20~007) for location of water bowser).
In addition, four fire hydrants are within reach (Manor Road) and in the proximity of the site. The fire hydrants will be available for use in the event of a fire incident.
Fire hydrants are maintained by the water board in accordance with BS99903. This standard requires regular inspection of at least once a year, and an annual test. The hydrants need to be able to provide the following flow rates according to the area they need to supply.

- <1 hectare 1,200 l/min
- 1 – 2 hectares 2,100 l/min
- 2 - 3 hectares 3,000 l/min
- >3 hectares 4,500 l/min

Based on this information the closest Fire Hydrant is likely to provide at least 1,200 l/min flow, which is 10 times greater than what is needed to manage a worst-case scenario on site (see Table 5 below).

20.2. Show the Calculation for Your Required Water Supply

Table 5: Water Supply Calculation

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
18 m^3	18 x 6.67 = 120 l/min	120 x 180 = 21,600 l OR 21.6 m^3	water browser: 1,000 l Fire Hydrant: 1,200 l/min x 180 = 216,000 l OR 216 m^3

21. MANAGING FIRE WATER

21.1. Containing the Run-Off from Fire Water

The most likely stage of the process for fires to start is the cutting process. This process is carried out fully within the contained dry dock barge. A 150 m containment boom will also be installed around the perimeter of the site permit boundary to contain any potential contaminants arising from SMM's operations and prevent them from leaving the permitted area.

In case of fire and use of water to extinguish it, the fire waters would be fully contained within the barge which is sealed system.

The volume of water required for firefighting to take place and to manage a worst-case scenario is 21.6 m^3.

As shown in Table 6, the water containment capacity of the floating dock is 1,920 m^3, which is far in excess.

Table 6: Fire Water Containment Capacities

FIRE WATER CONTAINMENT	
Dry dock barge capacity	40 m x 12 m x 4 m = 1,920 m^3

22. During and after an incident

22.1. Dealing With Issues During a Fire

During a fire, operations shall cease, and all incoming waste will be diverted from the site. Site staff will only engage in active firefighting if it is safe to do so. The Fire Rescue Service shall be contacted and presented with FPP upon arrival.

22.2. Notifying Residents and Businesses

In the event of a fire, the site will inform neighbouring residents and businesses through the City Council website and their social media channels.

The Environment Agency shall be contacted as per permit requirements on the Environment Agency Incident Hotline: 0800 80 70 60. As in the SMM's Health & Safety Policy v1 dated 01/04/2023, Emergency telephone 999 & 112 on mobiles.

22.3. Clearing and Decontamination After a Fire

After an incident a third-party contractor will be instructed to clear any residue (liquid or solid) and to empty the drainage and take any waste off site.

22.4. Making the Site Operational After a Fire

After an incident the site shall be inspected fully for any signs of damage to infrastructure and where appropriate fixes made. Site will not reopen until this has taken place.

The root cause of the fire will be established, and all site procedures and this document will be reviewed and updated where necessary. Staff training will be undertaken to ensure any changes in practices and operation are clearly understood

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