



Fire Prevention Plan

Hespin Wood Landfill,
Todhills,
Carlisle,
Cumbria,
CA6 4BJ.



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

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1. Introduction

- 1.1. This Fire Prevention Plan (FPP) has been produced by Westbury Environmental Limited on behalf of Seletia (HW) Ltd (Operator).
- 1.2. This FPP has been prepared in accordance with the Environment Agency guidance on Fire Prevention Plans: Environmental Permits, last updated 11 January 2021 (FPP Guidance). The FPP Guidance requires that the FPP accounts for the fire risk from potentially combustible waste types stored on the Site.
- 1.3. The objectives of an FPP are described in the FPP Guidance. The objectives are:
 - 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.
- 1.4. The FPP guidance provides minimum fire prevention measures to achieve each of the three objectives.

The Scope of this FPP

- 1.5. The activity of landfilling on this Site is excluded from the scope of this FPP as the current Environment Agency guidance on Fire Prevention Plans does not apply to landfilling.
- 1.6. Therefore, only the storage of waste at the Site prior to landfilling, is the subject of this FPP.
- 1.7. Waste stored at the Site prior to landfilling is located on an impermeable concrete pad and is shown on the Site Layout Plan see Drawing No. Site Layout Plan 24/012u 002 Site Layout Plan.

Using this FPP

- 1.8. A copy of this FPP must be kept in the Site office and be readily available to all members of staff.
- 1.9. This FPP forms part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this FPP are included within the EMS. Completed forms (records) will be kept, as required by conditions included in the Environmental Permit.
- 1.10. The contents of the FPP including fire prevention measures will be implemented on the Site through procedures within the EMS. The EMS includes an Environmental Training Checklist, see Appendix 1 Environmental Training Checklist, that includes all the required training for Site staff. This checklist includes fire prevention procedures. The training undertaken by each member of staff is recorded on their own training record as part of the EMS.
- 1.11. Training on implementing fire prevention procedures will be given to staff on an annual basis by the Site Manager. New members of staff will be given training on the fire prevention procedures during their induction.
- 1.12. All staff working on Site must understand the contents of this FPP to know what to do:
 - To prevent a fire occurring.
 - During a fire if one breaks out.
- 1.13. A fire drill will be completed on a six-monthly basis to test how well the FPP works and to make sure staff understand what to do in the event of a fire on Site. The fire drill will include:
 - Checks that staff are trained on relevant procedures,
 - Stockpile management,
 - Fire detection,
 - Fire suppression,
 - Use of the Fire Quarantine Area,
 - Firewater containment.
- 1.14. A checklist of what the fire drill should contain is provided in the EMS Appendix C, Procedures & Forms, Procedure 6.7.1 Fire Detection and What to do, see appendix 2 Fire Procedures.



Content of this FPP

- 1.15. This FPP describes how Seletia (HW) Ltd will operate their Site in relation to the minimum requirements for fire prevention measures included within the FPP Guidance.
- 1.16. A Site Layout Plan has been produced as part of this FPP. The location of Site infrastructure, fire prevention measures, storage of combustible wastes and flammable materials are shown on the Site Layout Plan see Drawing No. 24/012u 002 Site Layout Plan.
- 1.17. There is typically a risk of fire where potentially combustible wastes are stored. This FPP provides information on how Seletia (HW) Ltd will reduce the risk of an outbreak of fire and the potential impact that a fire may have.
- 1.18. A breakdown of the information that is included within each Section of this FPP is provided below.
 - Section 4 of this FPP provides information relating to managing fire risk from the storage of combustible waste. This Section addresses self-heating potentially resulting in self-combustion. This Section includes information relating to maximum storage duration, waste pile sizes and volumes, separation distances, containment facilities and how heat generated in waste piles will be managed.
 - Section 5 of this FPP provides information on the systems that are in place to detect a fire, both during and outside of operational hours.
 - Section 6 of this FPP provides information on the contingency measures that are to be taken during a fire. This Section includes information relating to the cessation of imported waste and notifying neighbouring businesses.
 - Section 7 of this FPP provides information on how Seletia (HW) Ltd will suppress and fight a fire. This Section includes information relating to the use of the quarantine area and the use of available water and inert material. Steps to be taken in relation to firefighting techniques are addressed for a fire occurring during and outside of operational hours.
 - Section 8 of this FPP provides information on the steps to be taken after a fire before the Site becomes operational. This Section includes information relating to managing firewater and contingency measures that are in place to remove any burned materials.



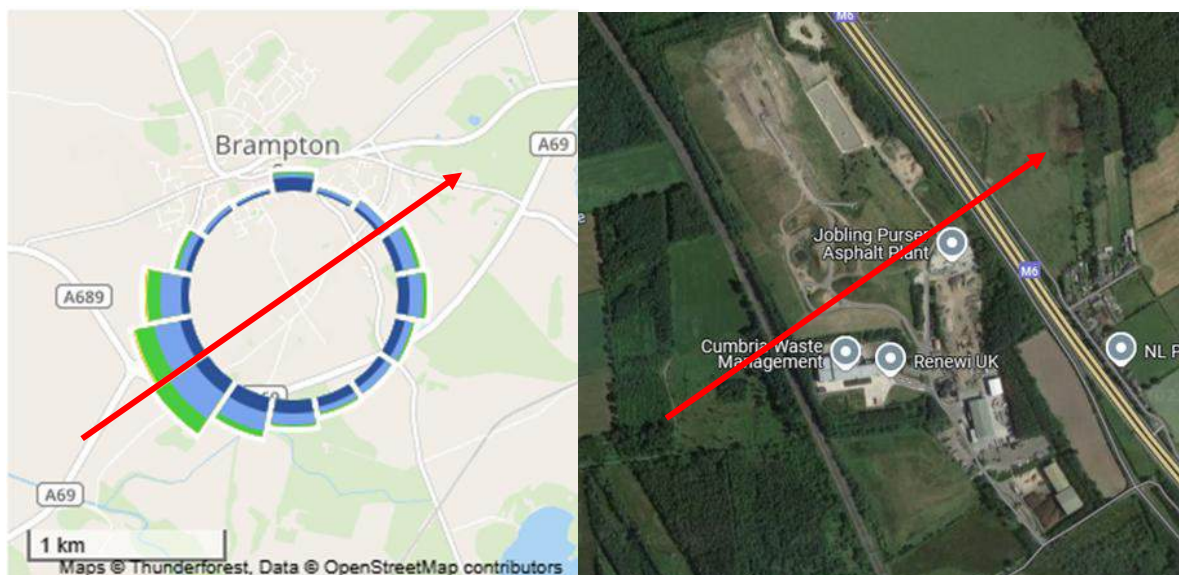
2. Site Information

Site Location

- 2.1. Hespian Wood Landfill Site is located at Todhills, Carlisle, Cumbria, CA6 4BJ.
- 2.2. The land surrounding the Site is largely agricultural, with the nearest residential area being Todhills which is located approximately 250m east from the Site boundary at its closest point.
- 2.3. The Site is not located within a Groundwater Source Protection Zone. The nearest surface water features are the Channel of River Esk located approximately 1.25km northwest and the River Eden approximately 1km southwest of the Site boundary.
- 2.4. The Site is located adjacent to an area containing protected habitats and species, located 1.15km northwest of the Site boundary at the closest point. This area is made up of a combination of Ramsar Sites, SSSIs, SACs and SPAs at Solway Firth and Solway Flats and Marshes.
- 2.5. The Site is located within flood Zone 1 and therefore has a low risk of flooding.
- 2.6. The Site is located on a principal designated bedrock aquifer. The Site is located on a Secondary A designated unproductive superficial drift aquifer.

Hazards and Receptors

- 2.7. This FPP identifies receptors within 1km of the Site that may be sensitive to the effects of a fire at the site. Sensitive receptors near the Site are identified on the Drawing No. 24/012u 001 Sensitive Receptor Plan.
- 2.8. Receptor sensitivity is a key factor in determining the significance of the effects of a fire as some receptors are more sensitive than others.
- 2.9. The storage of waste at the Site prior to landfilling takes place on a concrete pad to the north of the site.
- 2.10. Locations with a high sensitivity include:
 - Blackrigg Bungalow 225m southwest and 1350m southwest of concrete pad storage area.
 - Todhills residential area of 250m southeast of nearest boundary point and 820m southeast of the concrete pad storage area.
 - Wilson T Farm 365m southwest of nearest boundary point and 1350m southwest of the concrete pad storage area.
- 2.11. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from the effects of a fire. The effects of a fire such as smoke pollution reduces significantly the further away from the source.
- 2.12. The predominant wind direction also plays an important role in the potential impacts experienced from odour emissions.
- 2.13. Wind direction data has been obtained from Brampton weather station, see Figure 3.1. Brampton weather station is the nearest weather station with wind rose statistics and is located approximately 15km southeast of the Site.
- 2.14. The predominant wind blows towards receptors to the north-east of the Site which includes industrial and residential areas, see
- 2.15. Figure 2.1: Wind rose from Brampton weather station.
- 2.16. The Site is not located within an Air Quality Management Area (AQMA). Air quality for the immediate area is considered as a sensitive receptor. Smoke emitted from a fire can temporarily deteriorate the air quality of the immediate area.
- 2.17. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 2.1 Sensitive Receptors.

Figure 2.1: Wind rose from Brampton weather station**Table 2.1: Sensitive Receptors**

Receptor	Type of receptor	Bearing from Site	Approx. distance from Site boundary to receptor boundary (m)
M6 Motorway	Road	East	12
Blackrigg Bungalow	Residential	Southwest	225
Todhills	Residential	East	250
Wilson T Farm	Agricultural	Southwest	365
Floriston Rigg Commercial Units	Commercial	North	450
Todhills Services	Leisure	Southeast	580
Rockcliffe	Residential	Southwest	1000
Solway Firth (Closest Point)	SAC, SPA	Northwest	1015
Solway Flats & Marshes (Closest Point)	SSSI, Ramsar Site	Northwest	1015
Channel of River Esk	River	North	1015
River Eden	River	Southwest	1200



Waste Operations

- 2.18. The Site operates under Environmental Permit Ref. EPR/BM60261B and accepts waste for deposit into landfill in accordance with EA guidance. During daily operations, non-hazardous degradable waste materials are placed at the active tipping face and are compacted to optimise void utilisation and site stability. At the end of each working day, the deposited waste is covered with suitable inert cover material to minimise environmental risks such as windblown litter, odour, and vermin attraction.
- 2.19. Waste is brought to the Site and offloaded onto a concrete pad. Waste is stored on the concrete pad for a short duration. Waste is transferred by dump trucks from the concrete pad to the active tipping face of the landfill.
- 2.20. Further information relating to the storage of waste and substances, as it relates to managing fire risks, can be found in Section 4 Managing Fire Risks from the Storage of Waste.



3. Management of potential causes of fire

- 3.1. It is important to identify potential causes of fire on the Site in order to minimise these and reduce the likelihood of fires, thus addressing Objective 1 of the FPP Guidance; “minimise the likelihood of a fire occurring”. Potential causes of fire, taken from the FPP Guidance and how they apply to the Site, are listed in Table 3.1 below.

Table 3.1: Potential causes of fire

Potential Cause of Fire	Applicable to the Site	Comments
Arson / Vandalism	Yes	There is a low risk of unauthorised access on to the Site. The Site perimeter is fenced and has a gated entrance. There is security patrolling the Site during non-operational hours and CCTV is in operation.
Malfunctioning / breakdown of mobile plant, equipment or vehicles.	Yes	There is a risk of equipment and vehicles on the Site malfunctioning and/or breaking down.
Electrical faults (including damaged / exposed cables).	Yes	There is mains electricity located on the Site. The weighbridge, site offices and floodlighting are powered by electricity.
Discarded smoking materials	Yes	There is a risk of discarded smoking materials presenting a source of ignition.
Hot works undertaken for maintenance	No	Hot works are not considered as a source of ignition on the Site.
Industrial heaters, furnaces, incinerators or any other naked flames.	No	No industrial heaters, furnaces, incinerators or any other naked flames will be present on the Site.
Hot exhausts on mobile plant, equipment or vehicles.	Yes	There is a risk of exhausts of machinery, equipment and vehicles remaining 'hot' after use.
Batteries in End of Life Vehicles.	No	End of Life Vehicles are not accepted at the Site.
Fuel and waste oil stored on the Site.	Yes	Fuel is stored on the Site. There is a risk that fuel or gas could present a fire risk or source of ignition.
Gas cylinders, aerosols, combustible liquids and chemicals.	No	No on-Site welding is undertaken; therefore the Site does not store gas cylinders. Any necessary welding is undertaken by external contractors. Aerosols, combustible liquids and chemicals are not accepted at the Site.
Leaks and spills from site vehicles.	Yes	Vehicles will be used on the Site to import waste loads. There is a risk of one of these vehicles leaking fuel or oil.
Leaks and spills from End of Life Vehicles.	No	End of Life Vehicles are not imported on to the Site.
Build-up of loose combustible waste, dust and fluff.	Yes	There is a risk of loose combustible waste, dust and fluff building up within the storage area of combustible waste. Waste will be cleared out of bays typically on a daily basis and dust and the bays will be cleaned.
Reactions between wastes.	No	Any potentially reactive waste types identified within a load will be separated and stored appropriately, using a quarantine area if necessary. Waste Acceptance Procedures within the EMS will ensure that only permitted waste types are accepted on to the Site. Waste Acceptance Procedures will include: <ul style="list-style-type: none"> - The List of Waste codes from the Environmental Permit. - Instructions to visually check loads upon reception, acceptance and unloading.
Deposited hot loads (loads that are on fire)	Yes	There is a risk of a 'hot load' entering the Site.



Self-heating resulting in self-combustion.	Yes	There is a low risk of self-heating within piles of combustible waste stored on the Site. Waste is typically cleared from the pad on a daily basis. The maximum amount of time waste will be stored on the concrete pad is 14 days.
Operations carried out by neighbouring businesses.	No	There are no neighbouring businesses in the immediate vicinity of the concrete pad at the Site.

- 3.2. The remainder of the points in this Section describe in detail how Seletia (HW) Ltd will minimise the risks associated with the potential causes of fire that relate to this Site, as identified in Table 3.1 above.

Site Security

- 3.3. Site security is important in order to reduce the likelihood of unauthorised access on to the Site. The Site is secured with perimeter security fencing. The Site is accessed via a gate which is locked and secured when the Site is not operational.
- 3.4. The Site is manned during operational hours (07:00am to 18:00pm Monday to Friday) and has CCTV in operation. The Site has security personnel present during non-operational hours, who monitor CCTV and check the Site perimeter every hour.
- 3.5. There is a fire alarm on Site, the alarm will sound in the event of an emergency or fire. This will alert all staff on the Site.
- 3.6. There is floodlighting and security alarms present on the Site.

Plant, Equipment & Vehicles

- 3.7. Plant, equipment and vehicles are used on the Site. Plant and equipment include machinery for the movement of waste on the Site. Vehicles are used to import waste and remove contravening waste to and from the Site.
- 3.8. Mobile plant / equipment that is not being used will be stored at least 6m away from waste stored on the concrete pad. Mobile plant is stored approximately 50m away from the concrete storage pad, as shown on the Site Layout Plan see Drawing No. 24/012u 002 Site Layout Plan.
- 3.9. Two loading shovel plant is present (permanently) on Site.
- 3.10. All vehicles / mobile plant are provided with fire extinguishers to aid in active firefighting. The function of fire extinguishers is checked on an annual basis, using Appendix 3 Inspection Checklists.
- 3.11. Plant and equipment have the potential to malfunction / breakdown. In some instances, this could cause a fire, which in turn could spread to combustible waste stored on the Site. Plant and equipment will be maintained in line with manufacturers recommendations to reduce the risk of breakdown / malfunction. Plant and equipment will be checked for malfunctions on a daily basis, using Appendix 3 Inspection Checklists. Any fault will be noted on the Inspection Checklists and rectified as soon as possible.
- 3.12. Dust or particles settling on hot exhausts / engines can cause fires. Construction / demolition waste is stored on the Site which has the potential to be dusty in dry conditions. It is considered that the implementation of a Dust Management Plan on the Site will ensure dust emissions are minimised, and consequently the risk of fire from this cause is considered very low. Therefore, frequently inspecting the cooling of engines and exhausts for plant / vehicles / equipment is not proposed.
- 3.13. Dust suppression is carried out on Site. This involves the deployment of water sprays from dust suppression equipment.
- 3.14. There is a risk of fuel leaking / spilling during refuelling of vehicles / mobile plant on the Site. Fuel storage is located approximately 6m away from the waste stored on the concrete storage pad. Spill kits are available on the Site during refuelling. The condition / integrity of the fuel storage tank will be checked using Appendix 3 Inspection Checklists.
- 3.15. There is a potential for vehicles entering the Site to leak fuels and oils. Vehicles owned by Seletia (HW) Ltd will be maintained in line with manufacturers recommendations to reduce the risk of breakdown /



malfunction, which will include any corrosion, cracks, or leaks in any fuel/oil tanks. Spills kits will be used in the event of a spill or leak from vehicles on the Site. Oil and fuel storage at the Site will comply with the Oil Storage Regulations for Businesses (last updated 4th August 2020). Fuel is stored in bunded tanks in accordance with the Oil Storage Regulations.

- 3.16. Incoming loads containing 'hot loads' have the potential to spread fire to other waste types stored on the Site. In extreme circumstances, 'hot loads' may result in the carrying vehicle catching fire. Hot loads will be immediately directed to the Quarantine Area as shown on the Site Layout Plan see Drawing No. 24/012u 002 Site Layout Plan.

Ignition Sources

- 3.17. Naked lights can present a source of ignition. No materials are burned on the Site. A smoking shelter is provided, which is located 6m away from combustible waste. Smoking on-site is only permitted within this area, as shown on the Site Layout Plan see Drawing No. 24/012u 002 Site Layout Plan.
- 3.18. Hot works are not carried out by Site staff. If welding is required, an external contractor is employed. Hot works, if required, are not conducted within 6m stored combustible waste/combustible materials or liquids.
- 3.19. No naked flames, including incinerators, industrial heaters, space heaters, furnaces, are present on the Site.
- 3.20. All ignition sources present on the Site will be kept at least 6m away from combustible waste types.

Electricity

- 3.21. Electricity is used on the Site to power some of the operations, including the weighbridge and Site office.
- 3.22. The cut-off for electricity is shown on the Site Layout Plan Reference Drawing No. 24/012u 002 Site Layout Plan.
- 3.23. Damaged or exposed electrical cables and fittings have the potential to give off excess heat / create sparks. Power sockets can be overloaded which may result in the overheating of these sockets and wires.
- 3.24. Inspections of electrics, including wiring and equipment, are carried out by Site staff on a monthly basis to ensure that cables are in a good condition and sockets are not overloaded. Inspections are recorded using the Inspection Checklists form included within the EMS, see Appendix 3 Inspections Checklists.
- 3.25. All electrics, including wiring and equipment, on the Site are certified by a qualified electrician on an annual basis. A record of this certification is recorded using the Inspection Checklists. Associated records will be kept.
- 3.26. There are no generators located on Site.

Build of Loose Combustible Waste

- 3.27. Combustible residues collecting around waste storage areas can present a fire risk.
- 3.28. Storage areas will be regularly cleared to remove any residual loose combustible waste, dust or fluff.

Self-Heating resulting in Self-Combustion

- 3.29. The risk of self-heating occurring within waste piles is influenced by the following:
- Waste type.
 - Particle size.
 - Storage time.
 - Volume of stockpile.
 - Ambient temperature / external conditions (including heat produced from waste operations).



- 3.30. Self-heating is a potential cause of fire, as it may lead to self-combustion. Waste arising from the demolition of a building will be stored on the Site. This waste will include combustible materials such as wood and plastic which can be prone to self-heating.
- 3.31. The storage times of combustible waste on stored on the concrete pad is minimised to help prevent self-combustion. Waste that is brought on to the Site is moved from the concrete pad storage area to the landfill cell on the same day or next working day. Should there be a delay in moving the waste to the landfill, the maximum storage duration will be 14 days.



4. Managing fire risks – waste storage

Storage Duration

- 4.1. Combustible waste types stored on the Site is mixed non-hazardous degradable waste.
- 4.2. Waste will be typically stored for one day on the concrete pad prior to landfill. Waste will be stored on the concrete pad for a maximum of 14 days.

Stock Rotation Policy

- 4.3. Good stock rotation ensures effective management of the time that waste is stored on Site.

Pile Dimensions, Volumes & Separation Distances

- 4.4. The recommendations within the FPP Guidance in relation to stockpile sizes are proposed to be met on this Site. Stockpile volumes of waste stored on the Site are less than the recommendations included within the FPP Guidance.
- 4.5. Storage areas are shown on the Site Layout Plan Reference Drawing No. 24/012u 002 Site Layout Plan. Table 4.1.2 below summarises storage area sizes and maximum individual pile sizes, plus the volume for each waste type.
- 4.6. The maximum volume of waste that could be stored in any one of the three equal sized, storage bays has been calculated in two sections:
 - Section 1 - a cuboid at the back of the bay where the waste could be stored to a height of 3m in the bay giving a 1 m freeboard to the sides of the bay.
 - $3\text{m} \times 5\text{m} \times 14\text{m} = 210\text{m}^3$
 - Section 2 – a wedge to account for the sloped face of the waste in the bay, stored to a maximum height of 3m and maximum depth of 14m to give a 1m freeboard at the front and sides of the bays.
 - $(14\text{m} \times 4.3\text{m} \times 3\text{m}) / 2 = 90.3\text{m}^3$
 - Therefore, the maximum total waste that could be stored in any of the three bays is calculated by Section 1 (210m^3) + Section 2 (90.3m^3) = Maximum volume of waste stored at site (300m^3).

**Table 4.1: Waste storage area details**

Ref.	Contents	Type	Dimensions (LWH)	Max volume	FPP guidance Max volume	Comments
Bay 1	Mixed waste	Concrete fire walled bay	10.5m x 15m x 4m	300m ³	300m ³	Within FPP guidance storage limit. This stockpile will contain mixed waste. The EA FPP guidance says that if waste piles contain a mixture of combustible wastes, maximum limits are based on the type of waste that makes up most of a mixed pile. Each bay can store a maximum 300m ³ of waste.
Bay 2	Mixed waste	Concrete fire walled bay	10.5m x 15m x 4m	300m ³	300m ³	
Bay 3	Mixed waste	Concrete fire walled bay	10.5m x 15m x 4m	300m ³	300m ³	



- 4.7. Combustible waste is stored within 3 no. bays, bay walls will act as fire walls that measure at 4m in height. The maximum height of the waste stored within the bays will be 3m. This provides a 1m freeboard gap in accordance with the FPP Guidance.
- 4.8. The concrete pad is located at least 50 metres away from the Site perimeter, as shown on the Site Layout Plan, see Drawing No. 24/012u 002 Site Layout Plan.

Particle Size

- 4.9. Combustible waste stored on the concrete pad prior to landfilling is mixed degradable, non-hazardous waste of varying sizes.
- 4.10. To minimise the potential for self-heating waste is typically moved from the storage area to landfilling on the day it arrives at the site,

Contained Storage Bays

- 4.11. Concrete storage bays on Site provide a barrier allowing control of stockpile sizes. All storage bays on the Site have 4m high concrete fire walling, which provides a thermal barrier - confirmed to have a fire resistance period of at least 120 minutes.
- 4.12. The bay walls are constructed from industry standard precast R35 200mm thick concrete with a two hour fire rating. Concrete fulfils the requirements of class A1 fire resistance because its mineral constituents are effectively non-combustible.
- 4.13. Bays are accessible by mobile plant and firefighting equipment to allow for a fire inside the bay, to be put out. The integrity of the bays for retaining water is checked as part of the inspection checklists, see Appendix 3 Inspection Checklists.
- 4.14. If safe to do so, in the event of a fire within a bay mobile plant will be used to remove combustible waste from the vicinity of the fire, to minimise the likelihood of a fire spreading. Combustible waste will be transported to an area of the concrete pad which is at least 6m away from any other combustible waste. Mobile plant will be used to remove burned waste from the vicinity of the fire, to minimise the likelihood of a fire spreading as burned waste may reignite. Burned waste will be transported to the Quarantine Area, as shown on the Site Layout Plan, see Drawing No. 24/012u 002 Site Layout Plan.

Risk to Surface / Groundwater

- 4.15. Combustible waste is stored on the impermeable concrete pad prior to landfilling. The concrete pad is laid to fall, towards the rear of the concrete bays. Any water on the concrete pad will be contained in the rear of the bays by the concrete walls of the bays. This will prevent potentially contaminated surface water reaching land, groundwater and / or surface water courses.

Seasonal Variations

- 4.16. It is not anticipated that there will be a significant seasonal variation in demand or supply of the waste accepted on to the Site.

Managing Temperatures within Waste Piles

- 4.17. In accordance with FPP Guidance, the extra measures used to prevent self-combustion when waste is stored in maximum pile sizes for longer than three months, are not required at this Site. This is because waste is typically stored on the concrete pad for one day only and stored for a maximum of 14 days.
- 4.18. If an elevated outdoor temperature is forecast or detected of over 24 degrees Celsius Site staff will take action to prevent self-heating. Such measures could include:
- Application of water to aid cooling
 - Turning the waste to encourage air flow (may be less suitable in hot summer)
 - Moving all or part of the waste to another storage area (in shade/ to improve air flow)



- Remove from Site.

4.19. In the event of evidence of self-heating, Site staff will continue to observe the waste piles following the action taken to ensure no further heating is occurring.



5. Detecting a fire

Detecting of a Fire Outside of Operational Hours

- 5.1. Seletia (HW) Ltd operate a CCTV system, which overlooks the entire Site. The CCTV is monitored to help ensure early detection of fires and detect fires outside of operational hours.
- 5.2. Security staff monitor the CCTV every hour during non-operational hours. Senior management at Seletia (HW) Ltd are able to view this CCTV system at any time via devices e.g. phone, tablet, computer. During operational hours, monitors located in the Site office are viewed by Site management.
- 5.3. Site security staff will contact the emergency services and the Site Foreman / Site Manager immediately upon discovery of a fire. The Director lives within a 10-minute drive from the Site and therefore will be able to attend the Site promptly.
- 5.4. If the Foreman / Site Manager are both unavailable, then the site security will contact other members of senior management within the company to inform them of a fire at the Site.
- 5.5. Cumbria Fire and Rescue Service respond to primary fires within an average of 11 minutes and 1 second, 80% of the time (data correct as of March 2025, see <https://www.cumbriafire.gov.uk/>). Therefore, it is considered that the fire service will arrive at the Site within 11 minutes from when they are alerted of a fire. Site security will ensure there is access to the Site for the Emergency Services.
- 5.6. Staff will attempt to suppress the fire before the Emergency Services arrive if it is safe to do so. Information relating to active firefighting measures are included in Section 7 Suppressing a Fire and Firefighting Techniques.

Detection of a Fire within Operational Hours

- 5.7. Operational hours are between 07:00 am to 18:00 pm Monday to Friday.
- 5.8. All members of staff are trained to be vigilant to the signs of fire and to report any incidents to site management. Staff members will sound the fire alarm to ensure all members of staff are aware of the fire.
- 5.9. The emergency services will be informed immediately, by the Operator, if there is any evidence / suspicion of a fire on the Site.
- 5.10. Site staff undertake a fire watch daily, during operational hours. Fire watches are recorded using the Daily Checklist in Appendix 3, Inspection Checklists.
- 5.11. Visual inspections are carried out throughout the working day to check for fires / potential causes of fire. Staff are working to sort / separate the waste throughout the day and will therefore be able to quickly identify any signs that the waste is heating up, producing smoke or showing any other signs of a fire. Staff are trained on how to identify a fire and what to do in the event of a fire.



6. Contingency measures during a fire

- 6.1. Seletia (HW) Ltd will implement fire contingency plans via procedures contained within the EMS, see Appendix 2 Fire procedures.
- 6.2. Seletia (HW) Ltd are able to quickly cease waste imports in the event of a fire. All Site staff will be instructed to cease the importation of waste in the event of a fire.
- 6.3. Nearby businesses / residents will be contacted in the event of a significant fire. Contact details for these contacts are included on the Key Contacts Form within the EMS. In the event of a fire, all staff will inform others of the fire by activating the fire alarm / bell / horn.
- 6.4. In case of circumstances where maximum waste storage times are likely to be exceeded then stockpiles of combustible waste will be frequently inspected for any signs that the waste is heating up, producing smoke or showing any other signs of a fire.



7. Fire suppression and firefighting

Use of the Quarantine Area

- 7.1. The Site has a Fire Quarantine Area that accords with the FPP Guidance requirements, as shown on the Site Layout Plan Reference Drawing No. 24/012u 002 Site Layout Plan. The Fire Quarantine Area may be used for storing materials to prevent the spread of fire or to isolate materials that are likely to re-ignite or have been burned. This will aid in the overall suppression of a fire. The Fire Quarantine Area will be kept free of materials so that it can be used in the event of a fire.
- 7.2. The Fire Quarantine Area has sufficient separation distances (minimum of 6 metres) from any sources of ignition or building / perimeter boundary. The Fire Quarantine Area will be able to store approximately 168m³ (7m x 8m x 3m) of waste which is 50% of the volume of the largest stockpile of waste stored on the Site.
- 7.3. The Fire Quarantine Area will allow for faster active firefighting with regard to the removal of burning / burned material.

Use of Water

- 7.4. The Site has access to mains water and a borehole for water supply. The location of the borehole is shown on the Site Layout Plan, see Drawing No. 24/012u 002 Site Layout Plan.
- 7.5. Fire extinguishers and water from a mobile water bowser will be used as a first response measure in the event of a fire or to extinguish smaller fires before a larger problem arises.
- 7.6. All Site operatives will be trained on how to utilise the mobile water bowser and hoses in the event of a fire.
- 7.7. Site operatives must only tackle small fires on the Site and must not put themselves at risk by trying to fight medium / large fires. In the event of a medium / large fire, the emergency services will always be contacted. Upon arrival on Site, the fire service will assume overall control of all firefighting activities.

Water availability

- 7.8. Mains water is supplied at the Site to the weighbridge area and tipping area and can be used for fire suppression.
- 7.9. The borehole water is used to keep the following tanks full with water on Site and this water will be used for fire suppression using mobile water bowsters:
 - One 10,000 litre tank.
 - Eight IBC 1,000 litre tanks.
- 7.10. Three fire hydrants are located southwest of the Hespin Wood Landfill Site, as advised by Cumbria Fire and Rescue Service see Figure 1 below. Due to the scale of the Hespin Wood Landfill, the fire hydrants are located quite some distance from the waste storage area, approximately 600m to the southwest.
- 7.11. The emergency services would be unable to lay a hose to the nearest fire hydrants in the event of a fire. However, the fire hydrants could be accessed to obtain water to refill the fire appliance tanks.
- 7.12. Due to the fact that the fire hydrants are located approximately 600m southwest of the Site, the emergency services may not be able to utilise the nearby fire hydrants effectively in the event of a fire. It is considered that alternative suppression methods would be more effective than water for the suppression of fire. The use of inert materials for the suppression of fire on the concrete pad is considered more appropriate to extinguish a larger fire and is detailed later in this section.
- 7.13. One 10,000 litre water tank is located in close proximity to the tipping area. The water tank is fitted with a water pump and hose that can reach the whole of the tipping area. This pump can also be used to refill the on-site fire-engine. There are eight 1000 litre IBCs on site kept full of water that can be moved round the site if required with forklift trucks.



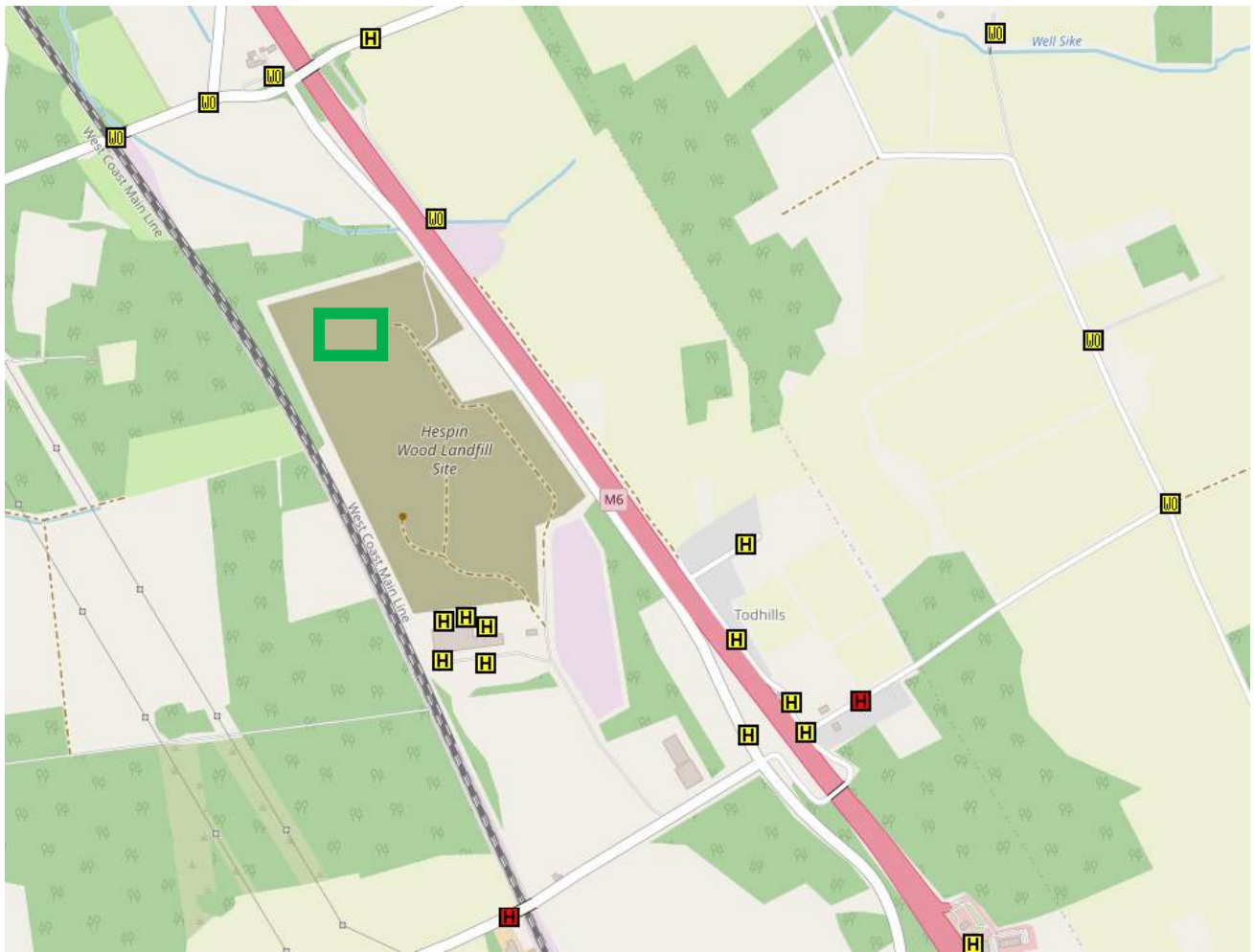
- 7.14. The Site has a Cobra 3 Carmichael Fire Engine on Site. The fire engine can access any part of the Site and has a tank and pump on-board. See link: [Cobra 3 ARFF VEHICLES-Simon Carmichael International Group Limited-Product category_carmichael_airports_series_municipal_industrials & refineries_rescue_hazmat & decons_special vehicles_simon_aerial platforms_water-foam towers](#).
- 7.15. The fire engine has capacity to hold:
- 3000 litres of water
 - 1000 litres of foam
 - 1000 litres of powder
- 7.16. FPP Guidance states 2,000 litres per minute for 3 hours is appropriate for a 300m³ stockpile of waste.
- 7.17. It is calculated that a total of 376,354 litres (376m³) of water would be required to extinguish a fire involving the largest pile of waste stored on the Site. It is calculated that it will take approximately three hours and eight minutes (188 minutes) to extinguish this fire, which meets the aim of a maximum four-hour time stated in the FPP Guidance. The calculation is as follows:

Fire Prevention Plan Guidance:

- $2000 \text{ l/min (flow rate required in FPP guidance)} / 300 \text{ m}^3 \text{ (pile size in FPP guidance)} = 6.67 \text{ l/min (water per minute for each m}^3 \text{ of waste)}$.
 - $6.67 \text{ l/min} \times 305\text{m}^3 \text{ (max pile size on Site)} = 2034 \text{ l/min (ideal flow rate)}$.
 - $2034 \times 180 \text{ minutes (FPP guidance)} = 376,354 \text{ litres (volume of water required to suppress 305m}^3 \text{ pile)}$.
 - $376,354 \text{ litres} / 2000 \text{ litres/minute flow rate} = 188 \text{ minutes to put out fire}$.
- 7.18. The water tanks, fire engine and water from the fire hydrants will be used simultaneously. Therefore, it will take 3.7 hours to extinguish a fire involving the largest stockpile on Site.
- 7.19. However, It is considered that the use of water from the fire hydrants would not be practical at this Site due to the large distance from the nearest hydrant.
- 7.20. Further information with regard to managing firewater on the Site is provided in Section 8 Recovery after a Fire.



Figure 7.1: Location of fire hydrants (Site marked in green)





Use of Inert Materials e.g. soil

- 7.21. The use of inert materials e.g. soil will be used for fire suppression in the event of a larger fire occurring on Site, that cannot be managed by fire extinguishers and/or mains water.
- 7.22. Typically, this method will be utilised during operational hours when trained operatives are on Site. However inert soils may also be used out of hours as soon as a trained operative has reached the Site.
- 7.23. Stockpiles of daily cover materials are located at the Site for the purposes of covering the active face or the landfill at the end of each day as shown on the Site Layout Plan, see Drawing No. 24/012u 002 Site Layout Plan. These materials are located within 100m of the concrete storage pad and can be used for fire suppression if required.
- 7.24. The following mobile plant is available on Site to transport inert materials:
- 2 x loading shovels at 6.9m³ capacity each.
- 7.25. A calculation is provided below to estimate the amount of time taken to extinguish a fire involving the largest pile of waste stored on the Site. It is estimated that a total of 83m³ of soil is required to smother the largest pile of waste stored on the Site to a depth of 0.5m, along its exposed faces (front and top elevation).
- Section 1 - Top face of waste pile cuboid area.
 - 5m x 14m = 70m²
 - Section 2 – Calculation for front face of pile surface slope: Surface Area of a slope = Cos / Planimetric Area.
 - Cos (height/run) (3 / 4.5) = 0.66
 - Planimetric area of slope (4.5 x 14) = 63m²
 - Surface area of slope = 63 / 0.66 = 95.45m²
 - Total surface area of waste pile = 70 + 95.45 = 165.45 m² (area of top and sloped front elevation)
X 0.5m (depth of inert material for smothering) = 83m³ of soil required.
- 7.26. The calculation below is provided for reference against the FPP Guidance. It is estimated to take 8 minutes to transport soil between the daily cover stockpile located to the south of the concrete pad, and the concrete pad storage area, then back to the daily cover stockpile (a round trip). Based on an 8-minute round trip, it would take approximately one hour to extinguish a fire involving the largest pile of waste stored on the Site, which meets the aim of a maximum four-hour time stated in the FPP Guidance, see calculations below:
- Total capacity of loading shovels is 6.9m³
 - 83m³ of soil is required to extinguish 185m³ of combustible waste
 - 83m³ of soil / 6.9m³ capacity of loading shovels = 12
 - 12 trips x 8-minute round trip = 96 minutes (approximately 1.5 hours) to extinguish the largest pile of waste.
 - If two loading shovels were used at the same time this would bring the estimated time to extinguish the fire down to 48 minutes (96 minutes / 2 loading shovels = 48 minutes)

Firefighting Techniques

Out of Operational Hours

- 7.27. Once a fire is detected, the emergency services will be contacted immediately by site security. The Foreman and Site Manager will also be immediately contacted. The Foreman lives approximately a 10-minute drive from the Site.
- 7.28. If the Foreman / Site Manager are both unavailable, then the site security will contact other members of senior management within the company to inform them of a fire at the Site.



- 7.29. Security personnel will be available to unlock the gated entrance outside of operational hours. Generally, the steps described in the section below on 'Firefighting Techniques - Within Operational Hours' would be implemented in the event that the Operator arrives on the Site prior to the emergency services.

Within Operational Hours

- 7.30. Seletia (HW) Ltd implement the following suppression and firefighting measures to minimise the impact of a fire:
- The emergency services will be contacted, if they have not been already.
 - Neighbouring businesses and key contacts (including firewater removal company) will be contacted if the fire is significant and likely to impact them. (The nearest sensitive receptor is located 820m south east of the concrete pad storage area).
 - If safe to do so, water and fire extinguishers will be used to tackle any small fire on the Site, the location of fire extinguishers are as shown on the Site Layout Plan Reference Drawing No. 24/012u 002 Site Layout Plan. Hoses will be connected to the mobile water bowser.
 - If safe to do so, mobile plant will be used to remove combustible waste from the vicinity of the fire, to minimise the likelihood of a fire spreading.
 - If safe to do so, mobile plant will be used to remove burned waste from the vicinity of the fire, to minimise the likelihood of a fire spreading as burned waste may reignite. Burned waste will be transported to the Fire Quarantine Area.
 - The Foreman/Site Manager will liaise with the emergency services upon arrival to inform them of the locations of combustible materials and the active firefighting actions taken up to this point e.g. any chance of reignition of burned waste.
 - The emergency services can use water from the borehole and on-site water storage, to extinguish the fire.
 - As an alternative fire suppression method (e.g. if water supply is insufficient/delayed), inert materials from landfill daily cover stockpile will be used to smother fire.
- 7.31. Fire Procedures within the EMS will implement the requirements of this FPP on the Site. These procedures form the basis for training and shall be followed in the event of a fire.



8. Recovery after a fire

Managing Firewater

- 8.1. The calculation in Section 7 Fire suppression and Firefighting states that a maximum of 376,354 litres (376 m³) of firewater would be produced when tackling a fire involving the largest pile of waste stored on the Site, if water was the only suppressant.
- 8.1. Since the Site does not have ready access to fire hydrants, as detailed in Section 7 above, suppression using inert materials, will be the main fire suppression method at the Site. Therefore, it is not considered necessary to demonstrate containment of 376 m³ of firewater.

Firewater Containment Capacity

- 8.2. Smothering with inert materials e.g. soil, will be used for fire suppression in the event of a larger fire occurring on Site, that cannot be managed by fire extinguishers /mains water/water bowsers/water tank. Therefore, only a small amount of water would be produced by using fire extinguishers and or bowsers.

Containment Area Design

- 8.3. The waste storage area is constructed on an impermeable concrete pad with a fall towards the rear, enclosed by 4m high concrete bay walls.
- 8.4. Any firewater produced by the suppression of a small fire with the fire extinguishers and/or bowsers will be contained within the waste storage area by the concrete bay walls.

Containment Measures

- 8.5. The impermeable concrete waste storage area at the Site has impermeable surfacing with perimeter concrete bay walls to prevent surface water runoff leaving the impermeable pad. The impermeable pad is laid to fall to the rear of the concrete storage bays.
- 8.6. In the event of a fire, 1m high concrete Lego blocks will be deployed across the front of the bays to prevent firewater escape.
- 8.7. These blocks are stored on-site and can be deployed within 30 minutes by trained operatives using mobile plant.
- 8.8. The impermeable surface and perimeter walls ensure that firewater is retained within the designated containment area.
- 8.9. The integrity of the bay walls are regularly inspected and maintained in accordance with the EMS, see Appendix 3: Inspection Checklists.

Contingency Measures – Managing Burned Materials

- 8.10. Burned waste will be monitored following a fire, to monitor for the waste re-igniting and to ensure the fire is completely extinguished. Combustible waste may be removed from the location of the fire to the Fire Quarantine Area if necessary. This removal of burned waste will help to minimise the risk of fire spreading.
- 8.11. Ash and partially burned materials resulting from a fire will be contained and then deposited in the landfill.
- 8.12. The importation of waste will resume as soon as the risk of further fires has been considered, and the Site is determined to be safe.



Drawings

Drawing No. 24/012u 002

Site Layout Plan

Drawing No. 24/012u 001

Sensitive Receptor Plan

Legend

Boundary - EPR/BM6026IB

Radius - 1km

Receptors

Leisure

Residential

River

Road

SAC, SPA

SSSI, Ramsar Site

Agricultural

Commercial

SAC,SPA,SSSI,Ramsar Site Approximate Border



Seletia (HW) Limited

Hespin Wood Landfill

Todhills
Carlisle
Cumbria
CA6 4BJ

Drawing Ref: 24/012u 001 Sensitive Receptors Plan

Version Number: 2

29th September 2025

Created By: SW
Checked By: TW

Scale:
Map: 1:20,000

0 500 1,000 m

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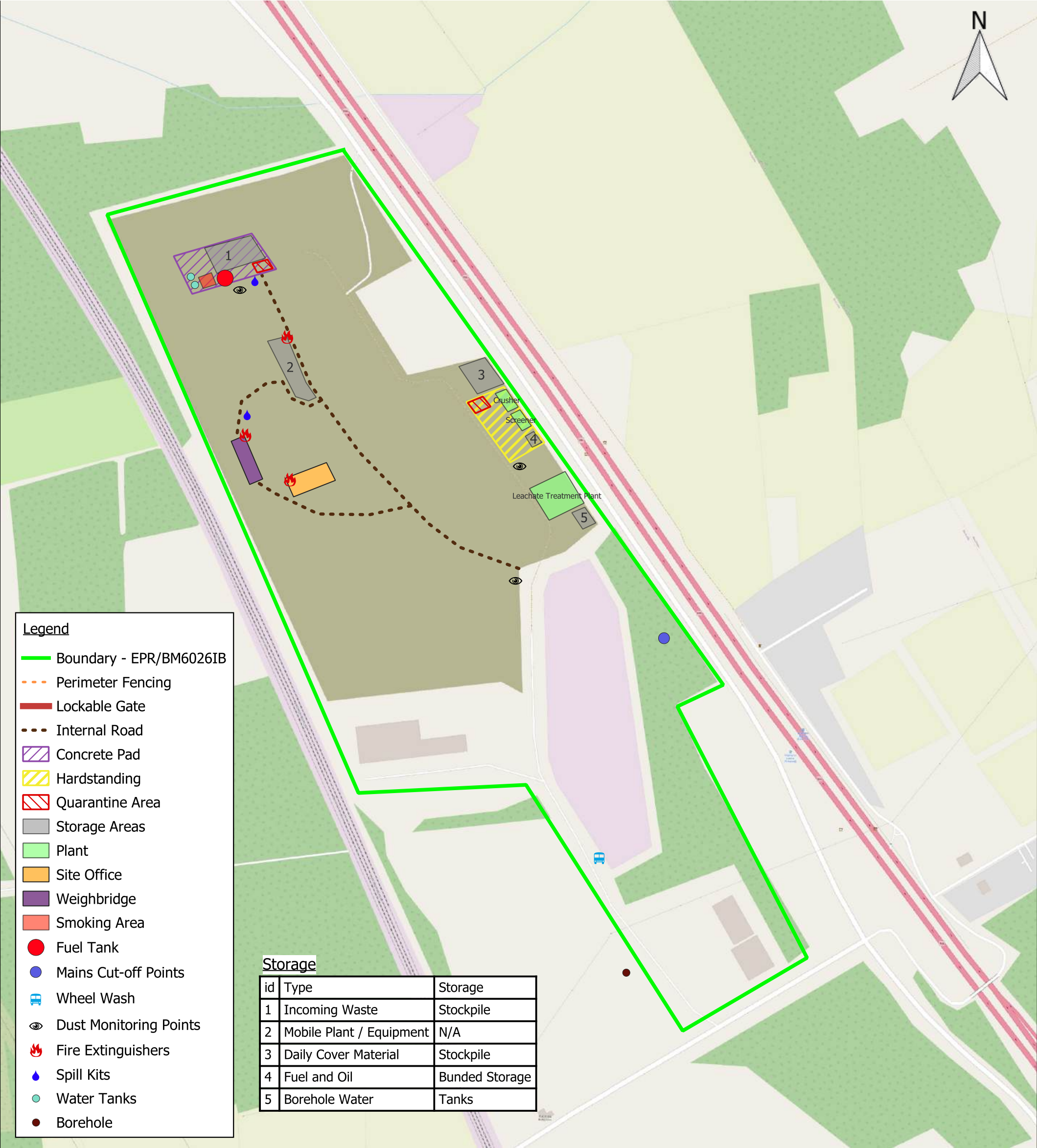
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Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk

id	Name	Type	Bearing	Distance	Noise	Dust	Odour	Fire
1	M6 Motorway	Road	East	12m	No	Yes	No	Yes
2	Blackrigg Bungalow	Residential	Southwest	225m	Yes	Yes	Yes	Yes
3	Todhills	Residential	East	250m	Yes	Yes	Yes	Yes
4	Wilson T Farm	Agricultural	Southwest	365m	No	No	No	Yes
5	Floriston Rigg Commercial Units	Commercial	North	450m	Yes	Yes	Yes	Yes
6	Todhills Services	Leisure	Southeast	580m	Yes	Yes	Yes	Yes
7	Rockcliffe	Residential	Southwest	1km	Yes	Yes	Yes	Yes
8	Solway Firth (Closest Point)	SAC, SPA	Northwest	1.15km	Yes	Yes	Yes	Yes
9	Solway Flats & Marshes (Closest Point)	SSSI, Ramsar Site	Northwest	1.15km	Yes	Yes	Yes	Yes
10	Channel of River Esk	River	North	1.15km	No	No	No	Yes
11	River Eden	River	Southwest	1.2km	No	No	No	Yes





0100200 m

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Drawing Ref: 24/012u 002 Site Layout Plan

Seletia (HW) Limited

Hespin Wood Landfill

Todhills
Carlisle
Cumbria
CA6 4BJ

14th October 2025

Scale:
Map: 1:5,000
Features: Not to scale

Version Number: 1

Created By: SW
Checked By: TW



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Appendix 1

Environmental Training Checklist

Environmental Training Checklist

Purpose: To provide information on the training required for each member of staff, dependent upon the role of that member of staff.

Role	Reference to Training Material	Main Topics to Cover
Site Operative (Drivers)	2 Waste Acceptance and Storage 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Deposition	Waste Carriers Licences. Completing Duty of Care documentation (Waste Transfer Notes). Accepting permitted List of Waste codes and the Environmental Permit. Understanding non-permitted waste and waste information. Rejecting loads.
	3 Site Management 3.2 Refuelling of Plant and Equipment	How to refuel vehicles.
	5 Emergency Provisions 5.1 Environmental Accidents / Incidents 5.2 Near Miss Reporting 5.3 Spill Response	Reporting of any environmental accidents / incidents or near misses. Reporting and dealing with spillages.
Site Operative (General)	2 Waste Acceptance and Storage 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage and Handling	Waste Carriers Licences. Completing Duty of Care documentation (Waste Transfer Notes). Accepting permitted List of Waste codes and the Environmental Permit. Rejecting loads.
	3 Site Management 3.1 Fuel and Oil Storage 3.2 Refuelling of Plant and Equipment 3.3 Maintenance 3.4 Housekeeping 3.5 Wheel Washing 3.6 Site Security 3.7 Waste Deposition 3.8 Waste Recycling 3.9 Leachate Monitoring	How to refuel vehicles. Schedule for maintenance checklist and completing maintenance checklists. Reporting of infestations and general site tidiness. Reporting of unauthorised access / break-ins and what to do in the event of an alarm. How to remove waste from the Site. Operation of the Wheel Washing facilities
	4 Environmental Protection 4.1 Dust, Fibres and Particulates 4.2 Mud and Debris	Mitigation / protection measures for dust, mud, noise and odour. Reporting complaints. Awareness of basic surface water management.

Role	Reference to Training Material	Main Topics to Cover
	4.3 Noise and Vibration Control 4.4 Odour 4.5 Surface Water Management	
	5 Emergency Provisions 5.1 Environmental Accidents/ Incidents 5.2 Near Misses 5.3 Spill Response 5.5 Utility / Equipment Failure 5.6 Fire 5.7 Emergency and Abnormal Conditions	Reporting of any environmental accidents / incidents or near misses. Recording of complaints. Reporting and dealing with spillages. Locations of shut offs and what to do in the event of failure(s). What to do in the event of a fire.

Site Manager	1 Implementation 1.1 Environmental Training 1.2 Roles and Responsibilities 1.3 Reviewing Documentation 1.4 Compliance with Legal and other Requirements 1.5 EMS Schedule 1.6 Communication 1.7a Environmental Policy	Training requirements and staffing structure. Attendance requirements of Technically Competent Managers (TCM's) and recording of attendance. Delegating responsibilities during leave and TCM attendance. Reviewing the development of cleaner technologies and their applicability to Site operations. Reviewing supporting documentation in EMS to ensure they are up to date. Awareness of legal responsibilities.
	2 Waste Acceptance and Storage 2.1 Waste Acceptance 2.2 Waste Classification 2.3 Waste Rejection 2.4 Waste Storage and Handling	Analysis of site investigation / waste information and further responsibilities for accepting and rejecting waste. Classification of waste in accordance with WM3 Guidance.
	3 Site Management 3.1 Fuel and Oil Storage 3.2 Refuelling of Plant and Equipment 3.3 Maintenance 3.4 Housekeeping 3.5 Wheel Washing 3.6 Site Security 3.7 Waste Deposition 3.8 Waste Recycling 3.9 Leachate Treatment	Locations of fuel and oil and ensuring substances are stored and handled as per requirements. Overseeing and regulating maintenance checklists. Receiving reports of infestation and resolving issues i.e., employing relevant contractors. Receiving reports of unauthorised access and undertaking the relevant actions. Overseeing the removal of waste from the site. Operation of wheel cleaning facilities
	4 Environmental Protection 4.1 Dust, Fibres and Particulates 4.2 Mud and Debris 4.3 Noise and Vibration Control 4.5 Surface Water Management 4.6 Surface Water Monitoring 4.7 Leachate Monitoring 4.8 Liner Construction and Capping	Recording and dealing with complaints. Managing dust, mud, noise, vibration, odour, and surface water.
	5 Emergency Provisions 5.1 Environmental Accidents/ Incidents 5.2 Near Misses 5.3 Spill Response 5.4 Flood Management 5.5 Utility / Equipment Failure 5.6 Fire 5.7 Emergency and Abnormal Conditions	Acting on / dealing with environmental accidents / incidents appropriately and recording the actions taken. Implementing Accident Management Plan and Contingency Plan. Recording and resolution of complaints. Reviewing near misses in relation to the updating of mitigation within procedures and supporting documentation. Overseeing the cleaning up of spillages. Required actions in the event of a flood.

		Ensuring equipment is maintained and management of staff in response to a failure. Managing active firefighting operations. How to recover if a fire occurs.
	6 Reporting 6.1 Waste Returns 6.2 Reporting 6.3 Notifications to the Environment Agency 6.3a Notification Form	Completing and submitting Waste Returns. When and how to notify the Environment Agency.

Form No. 1.1a Training Record

V.1, June 2025

Purpose: To record the EMS training completed by staff.

Each member of staff should have their own training record. Following training all information should be entered into the following table.

Staff name:			
Training Completed	Date Completed	Training Provided By:	Comments



Appendix 2

Fire Procedures

Procedure No. 5.6 Fire Prevention**V.1, June 2025**

Purpose: To ensure necessary action is taken in the event of a fire, to minimise the environmental impact.

	RESPONSIBLE PERSON	RECORD
1. Implementation of EMS procedures will minimise the occurrence of fire on Site including the following:	All	Procedure No. 2.1 Waste Acceptance
<ul style="list-style-type: none"> Implementing the Waste Acceptance Procedure reduces the risk of receiving unauthorized combustible waste onto Site. Unauthorised combustible wastes are rejected in accordance with the Waste Rejection procedure. Fuels and oils are stored and handled appropriately. Equipment will be maintained and services in accordance with manufacturer guidelines by competent staff or contractors. If a near miss event occurs, an event that didn't happen but could have caused a fire, the actions taken during this near miss event by all members of staff on Site are followed up and if effective, implemented on Site for future fire events. Effective management of common causes of fire which can occur on Site. No smoking on site. 		Procedure No. 2.3 Waste Rejection Procedure No. 2.4 Waste Storage and Handling Procedure No. 3.1 Fuel and Oil Storage Procedure No. 3.2 Refuelling Plant and Equipment Procedure No. 3.3 Maintenance Procedure No. 5.6 Fire

Fire Detected on Vehicle at Waste Reception Area

2. Only non-hazardous waste and is accepted on the Site. It is therefore unlikely that an incoming load will be on fire. However, in the unlikely event that a 'hot load' is discovered, the following procedure should be carried out.		
3. If it is safe to move the vehicle it should be directed to the emergency tipping area (quarantine). Once in the emergency tipping area, the load shall be ejected from the vehicle.	Site Manager	
4. If it is not safe to move the vehicle, then the Site Office building may need to be evacuated.		
5. The unloaded material should be smothered with soil (or other inert material) to reduce any spreading of the fire.	Site Manager	
6. The vehicle that brought the load shall be thoroughly checked to ensure that all burning/smouldering material has been unloaded.	Site Manager	
7. Once the material is no longer burning / smouldering and vehicle is in a fit state the waste shall be reloaded onto the vehicle and rejected off Site.	Site Manager	Procedure No. 2.3 Waste Rejection
8. The Environment Agency and the Health and Safety Manager must be informed of the incident as soon as reasonably possible and record the details of the incident in the Site Diary and complete the appropriate Accident / Incident / Complaints Form. All instances will require full accident investigation and revision of the Environmental Accident Management Plan.	Site Manager	Form No. 5.1a Key Contacts Form No. 5.1b Accident / Incident / Complaints Form Form No 6.3a Notification Form

Fire Detected in Office

- | | | | |
|-----|--|--------------|--|
| 9. | Upon discovery of a fire, raise the alarm to others. Inform other site staff using the site radio system or other means. | All | |
| 10. | If the fire is of minor nature, attempt to extinguish it with the firefighting equipment provided. Do not place yourself or others in danger. | All | |
| 11. | If you cannot control the fire, then contact the Emergency Services from the nearest safe telephone. Landlines are located in the Site Office. If no safe landline is available, then use a mobile phone. | All | |
| 12. | Evacuate the area and take the visitors book if possible. | Site Manager | |
| 13. | Assemble at the Emergency Assembly Point (located by the front gate) until the fire is extinguished and the Emergency Controller has issued further instructions. | All | |
| 14. | Check that all persons are accounted for using the visitor's book (if retrieved). Any missing persons will be reported to the Emergency Services. | Site Manager | |
| 15. | Inform all the other operators on Site of the emergency situation and shut the Site to non-essential access. | Site Manager | |
| 16. | Position a member of staff at the Site entrance to stop all oncoming traffic and direct the Emergency Services to the scene. | All | |
| 17. | The Environment Agency must be informed of the incident as soon as reasonably possible and record the details of the incident in the Site Diary and complete the appropriate Accident / Incident / Complaints Form. All instances will require full accident investigation and revision of the Environmental Accident Management Plan. | Site Manager | Form No. 5.1a
Key Contacts

Form No. 5.1b
Accident /
Incident /
Complaints
Form |

Recovery after a Fire

- | | | | |
|-----|---|--------------|---|
| 18. | After a fire is extinguished, it should be monitored until it is certain that it is completely out and poses no risk of causing a secondary fire. | Site Manager | |
| 19. | All burnt materials will be placed in a suitable container or quarantined, when safe to do so, and removed from the Site as soon as possible. Burnt materials will then be sent off site to a suitably licensed waste facility. | | |
| 20. | The discharge of fire water and other firefighting substances e.g., powder / foam that may be present on site will be managed according to the amount present and the level of contamination present. | | |
| 21. | The risk of a secondary fire will be assessed, after deciding there is no foreseeable chance of further fire, the Site will be cleaned up and re-opened. | Site Manager | |
| 22. | In all cases of a fire on the Site the cause of the fire will be investigated and recorded. | | Form No. 5.1b –
Accident /
Incident /
Complaints
Form |
| 23. | As a result of the fire investigation, if appropriate, further measures will be taken to reduce the likelihood of a similar fire taking place in the future. Appendix A.3 Environmental Accident Management Plan may then be updated accordingly. | Site Manager | Appendix A.2
Environmental
Accident
Management
Plan |

Fire Detection and What To Do

- | | | | |
|-----|--|-----|--|
| 24. | Fires will be detected by identifying visual (smoke and vapour etc), increased heat and burning odours. Upon detection of a fire, the Site Manager will be notified immediately. | All | |
|-----|--|-----|--|

25. A fire drill will be completed on a 6 monthly basis. The drills will go through what is to be done in the event of a fire and will typically include:

- Fire detection
- Fire suppression techniques
- Determination of locations to segregate burning wastes
- Fire water containment

26. Records relating to fire drills will be retained.

Site Manager

27. The results of the fire drills will be reviewed. If it is determined that the fire response is inadequate, then this will be updated to ensure responses are efficient and effective. If necessary, the accident management plan and contingency plan will be updated.

Site Manager

Appendix A.2
Environmental
Accident
Management
Plan

Appendix A.5
Contingency
Plan

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Form No. 5.6a Fire Drill Checklist

V.1, June 2025

Item	Aspect to be Checked	Checked?	Notes
EMS training	All staff members trained regarding fire procedures.		
Site Offices	Storage of combustible waste		
	Electrical smoking, housekeeping-dust and litter		
Fire detection	Assembly point located by the front gate.		
Suppression of a fire	Fire extinguishers in Site office.		

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Procedure No. 5.7 Emergency and Abnormal Conditions**V.1, June 2025**

Purpose: To ensure all staff are prepared in the event of an emergency or abnormal condition.

	RESPONSIBLE PERSON	RECORD
1. The Site has a Contingency Plan in place for emergency or abnormal conditions including breakdowns, unexpected releases, momentary stoppages, start-up, enforced shutdowns and any other change in normal operations i.e., extreme weather. The plan will minimise the impact on the environment and business continuity.		Appendix A.5 Contingency Plan

Contingency Plan

2. For all emergency and abnormal conditions, the Site Manager will determine if operations can continue. If safe to do so, the continuation of operations is the preferred option.	Site Manager	Appendix A.5 Contingency Plan
3. For some emergency and abnormal conditions, the Site Manager will obtain incident specific information before deciding if operations can continue.	Site Manager	Appendix A.5 Contingency Plan
4. For some emergency and abnormal conditions, information can be obtained in advance allowing the Site Manager to make a proactive, informed decision about managing Site operations and implementing any control measures to facilitate the continuation of Site Operations.	Site Manager	Appendix A.5 Contingency Plan
5. Some of the emergency and abnormal operations will require Government regulator e.g., the Environment Agency and HSE.		Appendix A.5 Contingency Plan
6. The Contingency Plan will be shared with relevant parties as necessary.	Site Manager	Appendix A.5 Contingency Plan

Preparation for an Emergency or Abnormal Conditions

7. Key contacts in the event of an emergency or abnormal condition can be found in Form No. 5.1a Key Contacts.		Form No. 5.1a Key Contacts
8. Seletia (HW) Limited retains customer contact details so they can communicate with them in the event of emergency or abnormal conditions.		Appendix A.5 Contingency Plan
9. Staff and customers will be made aware of any planned shutdowns in advance.	Site Manager	

During an Emergency or Abnormal Condition

10. Identified actions in the contingency plan will be followed.		Appendix A.5 Contingency Plan
11. If an abatement system was to have any downtime or an abnormal event occurred, then operations will be suspended until the Site is back under control.	Site Manager	

- | | |
|--|--------------|
| 12. Any equipment in use is made as safe as possible. For example, plant/equipment is switched off if safe to do so. | Site Manager |
|--|--------------|

Recovery after an Emergency or Abnormal Condition

- | | | |
|---|--------------------------|---------------------------------------|
| 13. The Site will only be re-entered once deemed safe by the Site Manager. | Site Manager | |
| 14. The insurance provider may be contacted depending on the severity of the impact. | Director
Site Manager | Form No. 5.1a
Key Contacts |
| 15. A suitably licensed contractor will remove any debris there may be on Site | Director
Site Manager | |
| 16. If documentation is lost or destroyed it should be replaced, there should be back-up copies in accordance with the Site Security Procedure. | Director
Site Manager | Procedure No.
3.6 Site
Security |

After Incident Report

- | | | |
|---|-----|--|
| 17. After the emergency or abnormal condition, the Site Manager will complete an after-incident report. This internal document will help strengthen response to an emergency or abnormal condition in the future and improve business continuity. | All | Procedure No.
1.1 Training,
Awareness and
Competence

Appendix No.
A.2
Environmental
Accident
Management
Plan

Appendix A.5
Contingency
Plan |
|---|-----|--|



Appendix 3

Inspection Checklist

Form No. 3.3a Inspection Checklists**V.1, June 2025****Daily Checklist**

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Signage	Adequate and clear					
Roads	Public highway clear of mud and debris					
Plant / Equipment	Cleanliness and good housekeeping after use					

Date: _____

Completed by: _____

Signature: _____

Form No. 3.3a Inspection Checklists**V.1, June 2025****Weekly Checklist**

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Site Security	Locks on gates working and no holes in gate.					
	No damage to boundary hedging					
Litter	Within waste operation area					

Date: _____

Completed by: _____

Signature: _____

Form No. 3.3a Inspection Checklists**V.1, June 2025****Monthly Checklist**

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Access Road on Site	In good condition, no potholes/damage					
Leachate management system	In good condition, no leaks/damage					
Landfill gas management system	In good condition, no leaks/damage					

Date: _____

Completed by: _____

Signature: _____

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V.1, June 2025

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Item Description	January	February	March	April	May	June	July	August	September	October	November	December

Include a tick to indicate to indicate the month in which preventative maintenance / service is required

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Form No. 3.3d Action

V.1, June 2025

Description of Item:
Action Required:
Action Completed:
Further Action Required:

Date: _____

Signature: _____

Further Action Completed:

Date: _____

Signature: _____

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