Wraik Hill Recycling Limited

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FIRE PREVENTION PLAN

Version 1.0

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SETTING OUT REPORT

This Fire Prevention Plan document has been prepared by Enviroawards Limited on behalf Wraik Hill Recycling Limited for the preparation and submission for a Bespoke Environmental Permit in support for the legal operation of a skip hire business. A high level of skill, care, attention and diligence, taking account of the timescales and resources devoted to it by agreement with Premier Tyres as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

Information reported herein may be based on the interpretation of public domain data collected by us and/or information supplied by the Client and/or its other advisors and associates. All information and data have been accepted in good faith as being accurate and valid.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment

Fire Prevention Plan

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1. Fire Prevention Objectives

Sites that store combustible wastes are at risk from fires on sites. These events can pose an environmental risk to receptors off site, both from the smoke plume from the fire and from the firewater runoff created by any firefighting activities. Sites storing combustible materials such as construction and demolition waste are required to have in place a fire prevention plan that follows the standards prescribed in the Environment Agency's (EA) guidance documents – updated 11th January 2021

This fire prevention plan has been designed to meet the following three core objectives:

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

This is a working document and will be reviewed and updated, in consultation with the Environment Agency (EA) on at least an annual basis, or immediately after an incident or a change to operations.

2. Proposed Operations

Wraik Hill Recycling is Skip Hire business and waste transfer station operated from Elysian Fields, Wraik hill, Whitstable, Kent, CT5 3BY. The Environmental Permit will be applied for by a Limited Company. The individual is named on 'Part A About You' application form. The company and associates have no relevant convictions. The site accepts mainly construction and demolition waste from mainly derived from skip hire. The operator has its own fleet of lorries which is operated under a restricted O-License. Skips are brought back to the facility, offloaded and manually sorted into individual waste streams. The operator does not advertise as an 'open tip' and only accepts waste into the site that has been collected by their fleet. The Technically Competent Manager will be Stephen Griffiths, He hold a HROC6 qualification.

3. Who This Guidance Applies to

The EA's Fire Prevention guidance applies to this site as the operator stores combustible waste; the combustible wastes include construction and demolition waste as detailed within this document.

4. Who This Guidance Does not Apply to

The Environment Agency guidance document does not apply to materials or waste that are; flammable; combustible liquids or gasses; hazardous; or dangerous substances stored under the Control of Major Accident Hazards Regulations. The guidance states that these materials should still be considered within the fire prevention plan because of their potential to increase the impact of fire on site. Therefore, the following materials are considered within this plan:

Type	Storage Location	Storage Features

DERV	See site plan (appendix 1)	Double skin, bunded diesel tank.
Maintenance Fluids/ Hydraulic Oil/ Engine Oil	See site plan (appendix 1)	2x 20L Drum Adblue 12x Grease Cartridges 4x 20L Engine Oil 4x 20L Hydraulic Oil

It is unlikely that non-permitted waste will be accepted into the facility and present a hazard.

5. Types of Combustible Waste

The types of combustible waste stored on site are limited to:

Waste Code	Description
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 05	iron and steel
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05 04	soil and stones other than those mentioned in 17 05 03
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19 02 10	combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 12 09	minerals (for example sand, stones)
19 12 12	mixtures of paper, cardboard, plastic glass and metal and other non-hazardous wastes from the processing of dry mixed recyclable and source segregated recyclable wastes.
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20 01 01	paper and cardboard
20 01 02	glass
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in.20 01.37
20 01 39	plastics

20 01 40	metals
20 02 01	biodegradable waste
20 02 02	soil and stones
20 03 07	bulky waste

The site will be permitted to store the following quantities:

Table D - Permitted waste quantities	
Annually	No more than 75,000 Tonnes
Any one time	No more than 300 Tonnes
Duration	No longer than 3 months

The location and dimensions of the combustible wastes stockpiles are presented within the waste table (Appendix 4)

6. Using the Fire Prevention Plan

This fire prevention plan forms part of the Operator's Environmental Management System. This fire prevention plan is a standalone document – it contains all relevant information, site plans and information to be used in a time of emergency. A copy of the fire prevention plan is stored within the site office in a clearly marked Red Folder, the site file is marked 'FIRE PREVENTION PLAN AND EMERGENCY ACTIONS'.

All site staff will be able to access the site file at all times, including during an incident. All staff and contractors working on site will be instructed on the content of the fire prevention plan and what to do to prevent a fire occurring, including what to do during a fire if one occurs.

All staff will receive training on the fire prevention plan. Wraik Hill Recycling will undertake regular exercises to test how well the plan works and they will make sure that the staff understands how to respond

Table (1) below outlines the schedules that will be carried out on site:

All new site staff and contractors (and existing site staff and contractors when the plan is introduced on site)	To be trained on the fire prevention plan and emergency actions during site induction
Existing site staff and contractors	To be trained on the fire prevention plan and emergency actions during the first week of the site becoming permitted (due to the site only operating under an exemption) and every 6 months (on the nearest practicable date to the 1st of the month)
Site Manager to carry out a fire drill and test the fire prevention plan and emergency actions	Every 6 months (or the nearest practicable date to the 1st of the month)

Site TCM and Site Manager	Annual review each year, or earlier if in a response to an incident or change in operational procedures

In addition, The following two individuals are trained as Fire Marshals:

- Luke Hadlow
- Lisa Hills

Fire Marshall training certificates are included Appendix 8

There is always at least one Fire Marshal present on site during operational hours, and the site operates with on a minimum ratio of at least one fire marshal per 5 employees. The procedures for fires discovered on site are provided both in Wraik Hill Recycling Fire Prevention Plan (FPP), Environmental Management System (EMS) and on-site notice boards.

7. Fire Prevention Plan Contents

This Fire Prevention Plan ensure that Wraik Hill Recycling will do all that is reasonable to prevent fires on site. The plan forms part of the broader written management system and includes an assessment of the sites fire risk and the measures in place to prevent, detect, suppress, mitigate and contain fires, including any run off through the use of fire water. The Fire Prevention Plan will be intrinsically linked to the sites operations and will provide the most robust set of actions required to protect the environment, human health, and all identified sensitive receptors from foreseeable fire risks.

8. Site Activities

The activities align with SR2022 No4: Non-Hazardous waste recycling, with the exclusion of asbestos and hazardous batteries.

Permitted Activities	
Activity reference	Description of Activities
AR1 – waste transfer and treatment	R3: Recycling/reclamation of organic substances which are not used as solvents. R4: Recycling/reclamation of metals and metal compounds. R5: Recycling/reclamation of other inorganic materials. D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.

	D14: Repackaging prior to submission to any of the operations numbered D1 to 13.
AR2 – storage of waste	R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)n D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

The activities are limited as follows:

(a) no more than 75,000 tonnes of waste shall be accepted each year

(b) no more than 300 tonnes of waste shall be stored at any one time

(c) no waste shall be kept at the site for longer than 3 months

(d) waste treatment is limited to:

- sorting,
- separation,
- bulking.

Activities on site currently consist of the receipt of skip waste arising primarily from the construction and demolition sector. Upon arrival, skips are unloaded within the designated waste reception area and the waste is manually sorted inside the processing building. Materials are segregated into individual waste streams for storage, recovery, and onward transfer to appropriately authorised facilities.

The waste types accepted at the site are well defined, documented, and readily identifiable through visual inspection, enabling waste to be directed efficiently to the appropriate storage or processing area. Manual sorting is currently undertaken to maximise the recovery of recyclable materials and to remove any non-conforming wastes.

9. Site Plans and Maps

The site is located within a small holding estate. The site location is Elysian Fields, Wraik hill, Whitstable, Kent, CT5 3BY

The National Grid Reference (NGR) for the site is TR 09814 63855 and the site location is illustrated on the location plan (appendix 3). The site layout is shown on the site layout plan (appendix 1)

The site is located in a rural area. The closest residential receptors lie within Pilgrims Lane which is approximately 283m to the Northwest of the site. A public house is located 148m to the Northwest of the site. The site has been screened and there are no European sites, Ramsar, Site of Special Scientific Interest or Marine Conservation Zone within 200m of the site. There are no National Nature Reserve,

Local Nature Reserve, Ancient woodland or Scheduled Monuments within 50m of the site. There are no sites that have species or habitats of principle importance (as listed in Section 41 of the Natural Environment and Rural Communities Act 2006) that the Environment Agency considers at risk to this activity within 50m of the site. The site is not within 50 metres of any well, spring or borehole used for the supply of water for human consumption, including private water supplies, or within a groundwater source protection zone 1.

The main access to the site is via Wraik Hill which is located approximately 190m to the East of the site. The surrounding land-use and receptors are identified on Appendix 2 (Sensitive Receptor Plan).

Searches on MAGIC confirmed that there are none of the following within 1km of the site's boundary:

- Areas of Outstanding Natural Beauty (AONB);
- Special Areas of Conservation (SAC);
- RAMSAR sites;
- Special Protection Areas (SPA);
- National and Local Nature Reserves;
- National Trust Properties;
- Woodland Trust Sites; and
- National Forest.

Identified Sensitive Receptors

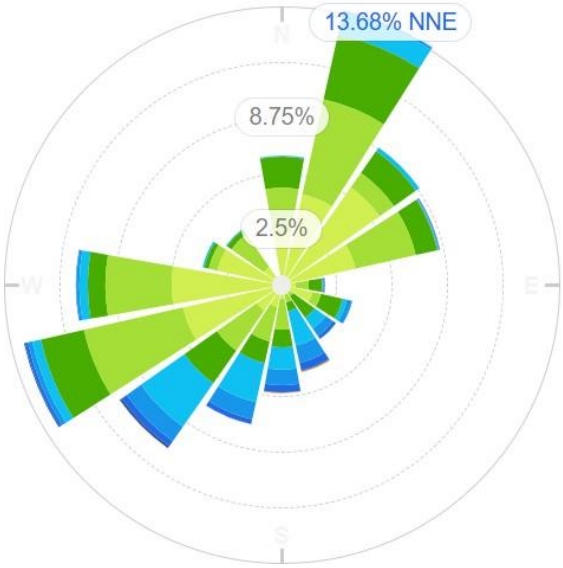
See Sensitive Receptor Plan (Appendix 2)

- Sites of Special Scientific Interest (SSSI);
- Local Wildlife Site

The two SSSI's identified within 1km radius are Ellenden Wood and The Swale.
The local wildlife site Sea Salter Dairy Farm.

Windrose

A windrose providing the frequency of wind speed and direction from Manston Meteorological Station for the period of 5 yearly averages is presented in Figure 4-1 below. Meteorological data were obtained from the Manston Airport Automatic Weather Station (AWS), located approximately 19 km east-southeast of the site. The station provides continuous automated measurements of wind speed and wind direction and is considered representative of the prevailing meteorological conditions within the local area The windrose shows that the most prominent wind direction is from the Nort North East. Winds from the North North East are relatively infrequent. Smoke contains a multitude of combustion products including irritants and asphyxiants which are toxic. These toxic pollutants can impact anyone within 1km of the site and in certain circumstances will have an impact on public health at greater distances than 1km. Smoke will have a significant effect on human health, as detailed within the research studies. The fire and smoke would affect the immediate businesses, local houses and the wider industrial and residential areas.

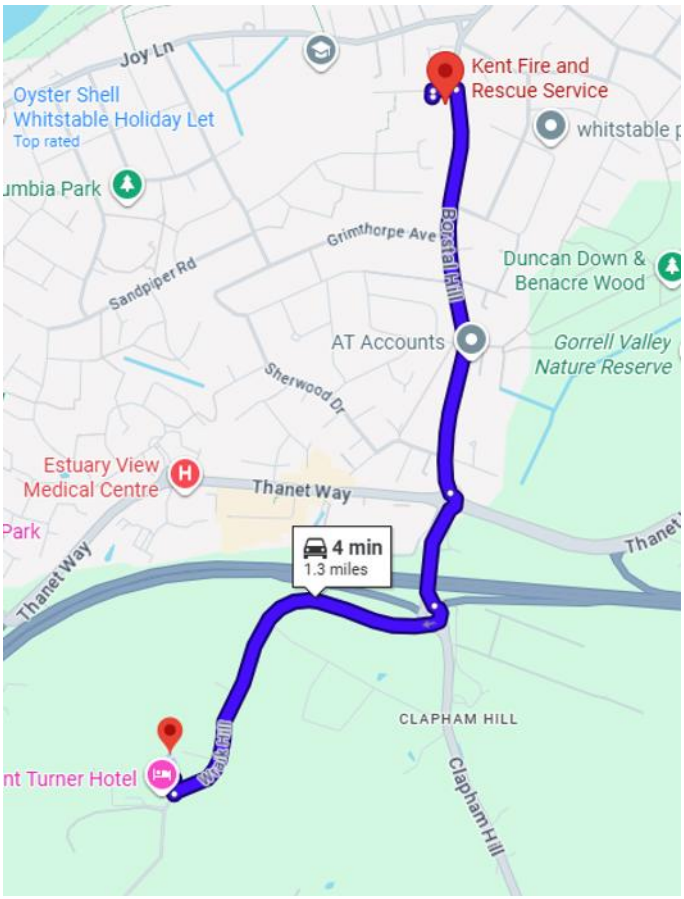


Site Infrastructure Plan
The Environment Agency Guidance states that the site plan must show the following information:

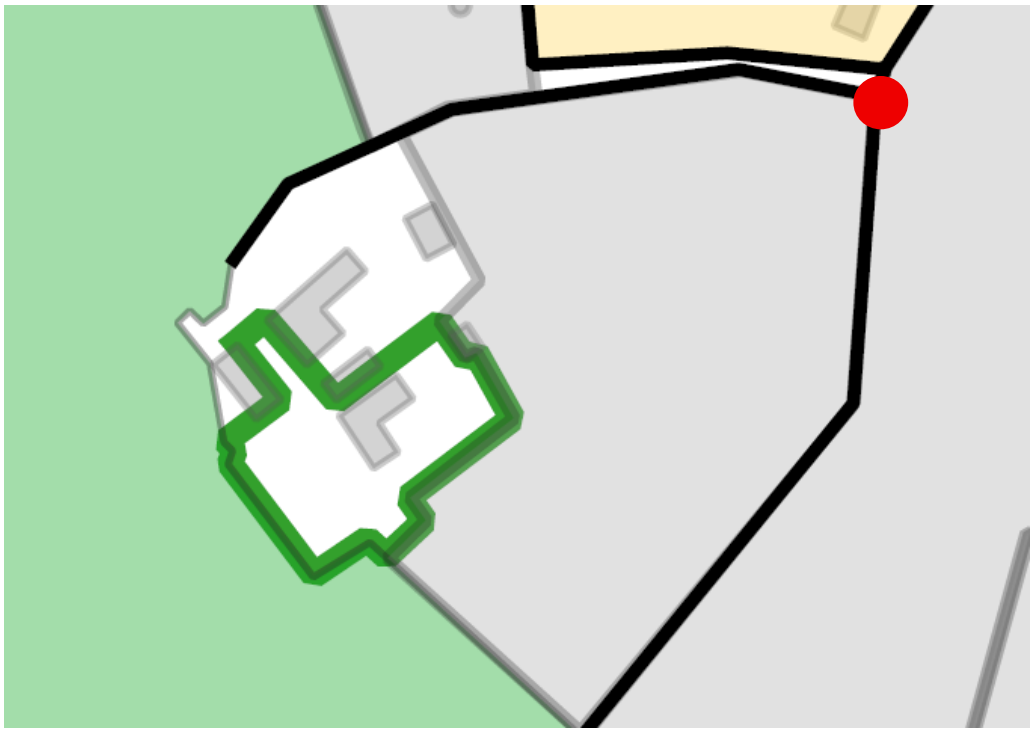
The location and layout of the site buildings, location of fire assembly area, fire extinguishers, smoke detectors and PPE storage area. Any areas where hazardous materials are stored on site (location of gas cylinders, process areas, chemicals, piles of combustible materials, oil and fuel tanks) See Appendix 1.

Main access routes for fire engines to assist firefighting, hydrants and water supplies can be seen below and on Appendix 5

Fire And Rescue Service Access



Hydrant Location



Areas of natural and unmade ground (Appendix 1) shows areas of unmade and impermeable areas.

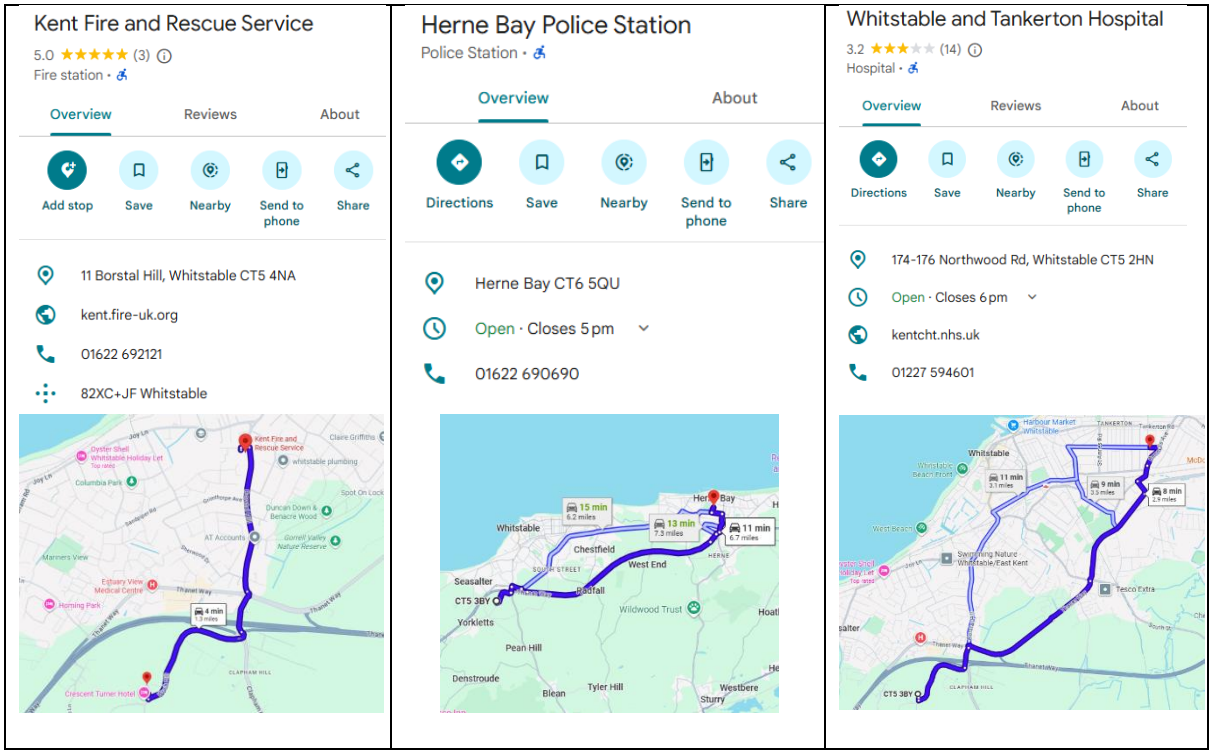
The location of fixed plant or where mobile plant is stored when not in use. Appendix 1

Drainage runs, pollution control features such as floods gates and other fire water containment systems. Appendix 1 shows Site drainage system, firewater and containment bunding

Storage areas with pile dimensions Including quarantine area can be seen on Appendix 1

Emergency Services:

Kent Fire and Rescue Service	Hampshire Constabulary	Whitstable and Tankerton Hospital
1.3 Miles / 4 min drive	7.3 Miles / 13 min drive	2.9 Miles / 9 min drive



10. Manage Common Causes of Fire

Arson

The site benefits from a continuous presence of staff during operational hours, currently between 7am to 5pm Monday to Friday, and 8am to 1pm on Saturdays. In addition, the site

Security features on site includes:

- 2m high perimeter fencing surrounding the site;
- Main access gate controlled by keyholders on the private estate. The gate is secured by a highly sophisticated and commercial grade lock.
- The site is enclosed around the entire boundary
- CCTV systems across the site.
- The building is 4 sided and therefore secure from unauthorised access
- The site benefits from x2 residential properties, the business owner lives on site.

The main gate is opened to accept waste deliveries during working hours 7am – 5pm Monday to Friday, and 8am to 1pm on Saturday. Outside of these hours, access to the private estate is strictly by keyholders only. Any keyholder accessing the site is required to close/lock the gate once they have gained access, and close/lock the gate once they have left.

All visitors and contractors are required to sign in and are escorted by a member of staff. CCTV is accessible and remotely viewable on mobile devices at all times. If a breach in security is detected site operatives will contact the Site Manager and the emergency services as appropriate, both inside and outside of operational hours.

All security measures on site are inspected at the commencement of every working day by site TCM to ensure their continued integrity. Any defects or damages which compromise the integrity of the site security features will be made secure by temporary repair by the end of the working day. Permanent repairs will be made within a maximum of 5 days.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented, such as repositioning of CCTV cameras, repair of security infrastructure, and/or additional deterrents. This will be recorded in the site diary. Records maintained include inspections and maintenance of perimeter fencing and gates, doors and locks, breaches of security, investigations and actions taken.

Mobile Plant/Equipment
Mobile plant consists of:

- 2x Material Handlers (13 ton)
- Telehandler (5 ton)

Mobile Plant is checked daily before use and regularly maintained as part of Health & Safety Procedures and within manufacturer guidelines. Maintenance is recorded in daily and weekly (depending on the maintenance required) and recorded on the plant maintenance sheets. Any faults or problems noted during the daily checks are reported either directly to the manager, or in their absence, the most senior operative so that the problem or fault can be rectified. Again, actions will be recorded using the sites defect sheet. Fire extinguishers are strategically located around the site to ensure that fires can be dealt with swiftly.

Mobile plant will be cleaned down daily to remove dust build up, fluff and any other potentially combustible materials.

Mobile plant that is not being used is kept a minimum distance of 6 meters away from combustible materials. Mobile plant will be fully isolated at the end of every working day. Employee/visitor/contractor vehicles are parked in the designated car park which is located at the back of the site well away from storage and processing areas. The location of mobile plant when not in use can be seen on Appendix 1

Fixed Plant – The facility does not utilise fixed plant

Luke Hadlow is responsible for all aspects of plant maintenance for safety, preventative maintenance, and fire and pollution prevention.

Electrical faults including damaged or exposed electrical cable
All buildings have been wired by a qualified/certified electrician and daily checks are carried out on all portable hand tools and electricals. Fixed electrical are protected from the operations activities but will undergo a full inspection every 5 years.

If cables are Identified as damaged, procedures are in place for reporting damage to cables to ensure isolation to these areas. The TCM will be responsible for making these checks and instigating repair works.

Discarded smoking materials

A no smoking policy is enforced on site with clear signage prohibiting it. The designated smoking area is a safe distance away from combustible wastes to prevent accidental ignition. Smoking materials, lighters and matches will not be taken into the main building. The location of the smoking area is illustrated on Appendix 1 (site plan)

Hot Works

Hot works is not an intended activity for the site, however, If for any reason hot works was undertaken (E.g. using cutting equipment for engineering works on the fixed plant) then this activity will carried out in a controlled setting due to it giving rise to sparks and through generation of heat. A permit to work system will be implemented to factor in the risks involved with ignition and heat sources. A fire watch will take place after the hot works is complete. Thermal imaging cameras will be used to detect any residual heat. Once the heat has dissipated, the components will be placed into storage. The permit to work system will dictate what firefighting equipment will be needed. Waste and other combustible materials will be placed a minimum of 15 metres away from any hot works. Heat/spark screens will be erected around the hot works area.

Industrial Heaters

No industrial heaters will be utilised on site.

Hot Exhausts

Vehicles are turned off when not in use and stored within the operational side of the building (where waste is not stored as (illustrated on the site layout plan). There is a distance of at 6m away from combustible waste storage areas. Consideration is given to the high-risk time for hot exhausts (one hour after switching off when dust can settle on hot surfaces). Vehicles are switched off at least 30 minutes before the end of the day, for them to cool down prior to site staff leaving site. They are also cleaned daily to remove any dusty materials. A fire watch is conducted via visual assessment a minimum of twice every working day to detect signs of heat/fire caused by dust settling on hot vehicle exhausts or engine parts. A visual assessment is also conducted at the end of the working day.

The hot exhaust fire checks will be carried out at the following times:

Fire watch visual inspection on plant and exhaust parts (and using heat detection camera on stockpiles)	Date	Time	Actions Taken	Signature
Fire Watch 1		12:00		
Fire Watch 2		16.30		

Sunlight

Waste is stored externally within sealed, robust containers located in the site yard. The nature of the containers prevents direct exposure of the waste to sunlight.

The risk of waste heating due to solar radiation is considered low, as the waste is contained within enclosed containers designed for the storage and transport of such materials. In addition, waste storage times are minimised through regular stock rotation and prompt removal from site.

Ignition Sources

Potential ignition sources include hot exhausts and engine parts and discarded smoking materials (all described above). All ignition sources will be kept a minimum of 6m away from the storage of combustible waste and flammable material. A risk assessment will be made on all sources of ignition to ensure that they are required on site or if other items of equipment can be utilised instead (reduce requirement for items which carry inherent risks).

Batteries

The site will not be permitted for the acceptance of waste batteries.

Batteries arising from plant/vehicles are disconnected and removed via maintenance service contractors appointed to maintain the sites fleet and plant. A mobile fitter will attend the site and fit a new battery and take the disconnected battery away.

If plant is not being used for the foreseeable future, to eliminate the risk of the plant short circuiting and causing a fire, batteries from plant will be placed into suitable lidded battery boxes with an acid resistance base. Batteries will be stored upright (contact points facing upwards). If batteries are identified as damaged, they will be isolated away from other batteries of the same chemistries. These batteries (likely to be lead acid) will be stored separately from lithium-Ion batteries.

Leaks and spillages of oils and fuels

All lubricating oils/fluids are appropriated stored in a 20 foot shipping container. The site stores fuel (DERV) in a doubled skinned bunded fuel tank. The container is situated on impermeable surfaces and there are no drainage points located near it. Inspection of any spillages or leaks from containment will be completed at least once per shift by a site operative. The results of all daily and weekly monitoring will be recorded in the site diary, as well as any remedial actions. In the event of any potentially polluting leak or spillage occurring on site following actions will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from flowing outside the EP boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be notified within 24 hours.

All equipment and plant is inspected on a daily basis for leaks.

Build up of loose Combustible Waste, Dusts, and Fluff

The site will be inspected regularly for the build-up of loose combustible waste, dust and fibres. This material will be removed from site on a regular basis, and immediately if near a source of ignition or heat. The frequencies are outlined below:

Inspection to assess the build up of loose wastes, dusts and fluff	Date	Time	Actions Taken	Signature
Loose waste inspection 1		12:00		
Loose waste inspection 2		16.30		

The risk of the build-up of combustible waste, dust and fluff is low due to the following measures implemented on site.

- All incoming waste is tipped directly into the sorting shed to minimise unnecessary handling and transport distance therefore minimising the potential for wind-borne dust;
- All plant and equipment is subject to a programme of planned preventative maintenance which follows the inspection and maintenance schedule recommended by the manufacturer. This includes corrosion prevention where applicable;
- All waste treatment takes place in buildings, minimising the potential for dust emission;
- Waste types accepted onto site are not inherently dusty;
- Site access roads and external operational areas are maintained and swept regularly to reduce dust generation; and
- Daily visual inspection of the site and site boundary is carried out by site personnel.
- Daily site shut down procedure which includes the over running of plant to ensure all materials are discharged and a full clean down proceeds.

Reactions Between Wastes

The waste storage areas will have a separation distance of at least 6m from the building walls and other materials around the site. The location of waste storage areas are illustrated on Appendix 1. Strict waste acceptance procedures implemented on site ensure that only permitted wastes are accepted. All incoming loads are booked in advance with the manager who records the source and EWC code of the load to be delivered. When the waste arrives on site the waste transfer notes are checked against the received waste, and the weight and description the waste is verified via a visual assessment

Unauthorised wastes will be immediately placed into a quarantine area (and marked with a yellow quarantine sign). The site manager notifies the customer of the non-conforming material within 24 hours of receipt, and where the material is not permitted, arrangements will be made to return the material to the customer at the customer's expense.

Care will be taken to ensure that any non-conforming wastes found within loads are stored in an appropriate manner; for example, avoiding the storage incompatible wastes such as oxidisers and flammable together. The quarantined wastes will be checked daily as a precaution.

Deposit of Hot loads

No burning, reactive/reacting or visibly hot (producing steam or heat) loads are accepted on site. Each load is visually inspected on arrival to ensure compatibility with accompanying waste transfer notes. Site operatives undertake a visual inspection of the incoming waste for signs of heating such as steam and smoke. This minimises prohibited wastes and the acceptance of hot loads. Should a hot load be deposited on site, it will immediately be removed to the dedicated quarantine area and extinguished immediately. Any fire damaged waste will be removed from site as a matter of priority to a suitably licenced facility for disposal. The site is equipped with thermal imaging cameras which will aid in the detection of hot loads. The quarantine area has capacity to store 50% of the sites largest stockpile.

Storage of Fuel, Oils and Maintenance Fluids

Procedures will be put in place to ensure safe storage of fuels and fluids associated with maintenance. Guidance will be taken from the HSE and the fire and rescue service

Hazardous materials such as maintenance fluids will be stored. All lubricating oils/fluids are appropriated stored in a 20 foot shipping container (see COSHH storage area on the site plan). The container houses drip trays that COSHH items are housed on to deal with any incidental spillage. This will provide a 110% bund for the total amount of COSHH Items placed on it. there are no drainage

points located near it. Inspection of any spillages or leaks from the containment area will be completed at least once per shift by a site operative. Oils and Maintenance fluids They will be located away from likely sources of ignition, away from the perimeter of the site, away from processing areas and out of the direct line of traffic. Incompatible materials will not be stored together. These materials will not be stored in direct sunlight.

11. Prevent Self-Combustion

The most effective way to reduce the impact from fire on site is to prevent them from occurring in the first place. Managing storage times, pile volumes and height, and the temperature of the wastes can prevent the self-combustion of wastes.

The locations, sizes and composition of the stockpiles are presented within Appendix 4 (Waste Table) and Appendix 1 (site plan)

Self-combustion of waste on site is not considered to be a significant risk due to the short storage times (under normal operational conditions) and because waste is segregated into dedicated storage areas. All waste is stored within a 40 yard containers.

The controls in place to reduce the risk from fire are summarised as follows:

- No loads are removed without an onsite operative in supervision;
- A visual watch is performed as the loads are received and unloaded; and
- Quarantine areas are kept available. Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded, and the vehicle turned away. If wastes have already been discharged and are deemed not to conform or otherwise not be permitted, then the waste will be:
- Removed to a designated quarantine area and marked with a yellow sign; and
- The site manager will notify the customer of the non-conforming material within 24 hours of receipt and arrangements will be made to return the material at the customer's expense

Storage Times
A summary of the storage times for wastes received under standard operations is provided in the table below:

The activities are limited as follows:

(a) no more than 75,000 tonnes of waste shall be accepted each year

(b) no more than 300 tonnes of waste shall be stored at any one time

(c) no waste shall be kept at the site for longer than 3 months

All storage times are detailed in Appendix 4 (Waste Table)

Waste Storage

Incoming waste is delivered and unloaded (tipped) into the designated treatment building (sorting shed). This is standard practice for Wraik Hill Recycling to avoid double handling. Waste is therefore not stored pending treatment; it is only stored once sorted.

Following sorting within the designated waste transfer and sorting shed, wastes are segregated into individual waste streams and stored externally within dedicated 40-yard containers. Waste streams stored on site generally include wood, cardboard, UPVC, metals, non-ferrous metals, plasterboard, and the non-recyclable residual waste fraction. Inert materials, including soil and hardcore, are stored separately within designated storage bays.

The site operates a maximum of six 40-yard containers for combustible wastes, and x2 8-yard containers. Containers are covered when not actively being loaded or unloaded and are positioned with a minimum separation distance of 6 metres between each container. This arrangement significantly reduces the potential for fire spread between waste streams and allows unrestricted access for inspection, fire-fighting activities, and plant movement in the event of an incident.

Waste may be stored on site for up to three months in accordance with permit requirements; however, in practice waste is typically removed from site within three to four days of receipt. The Operator maintains multiple outlets for each waste stream, ensuring that materials are regularly removed from site and that excessive waste accumulation does not occur. Should a regular outlet become unavailable, alternative recovery and recycling facilities are available through existing commercial arrangements, ensuring continuity of waste movements and compliance with storage limits.

The site is equipped with CCTV coverage and all waste storage areas are subject to daily inspections by the Technically Competent Manager (TCM) or their nominated deputy. Temperature monitoring is undertaken using a handheld thermal imaging gun as part of routine inspections to identify any abnormal temperature increases within waste containers. Any load showing signs of elevated temperatures, smoke, smouldering, or other indications of combustion will be immediately isolated within the designated quarantine area pending further investigation and management.

A 360 Material Handler and telehandler are available on site at all times during operational hours. In the event of a fire, this plant can be used to separate waste, create fire breaks, remove unaffected containers from the vicinity of the incident, and assist emergency responders in accessing the affected area.

The Operator implements the following procedures to minimise fire risk and prevent excessive storage of combustible wastes:

- Rejected or suspect wastes will be recorded and transferred to the designated quarantine area for inspection and management;
- Authorised wastes will be sorted and stored only within their designated containers or storage areas;
- Waste will be removed from site on a first-in, first-out basis wherever practicable to minimise storage times;
- Daily inspections of all waste storage areas and containers will be undertaken by the TCM or a suitably trained operative;
- Temperature monitoring will be undertaken during routine inspections using a thermal imaging device;

- Any waste identified as presenting an elevated fire risk will be prioritised for removal from site; and
- Weekly reviews of waste quantities, storage durations, and container occupancy levels will be undertaken by the TCM to ensure waste is removed from site at the earliest opportunity.

This Fire Prevention Plan is a live document and will be reviewed regularly throughout the operational life of the site. Any significant changes to site operations, waste types, storage arrangements, or fire prevention measures will be incorporated into future revisions. Any proposed amendments to the Fire Prevention Plan and associated management systems will be submitted to the Environment Agency for approval where required.

Monitoring and control temperature

The site is continually manned during operational hours and site operatives remain vigilant at all times and look out for signs of fire. Staff are trained in how to identify fires and fire hazards on site. During operational hours, the temperature of all waste storage is checked continuously via the static thermal imaging cameras which will detect any temperature increase. Any significant findings will be documented in the site diary. If a temperature of above 50°C is detected, the actions described in the table below will be carried out

Temperature (°C)	Actions needed
0 - 50	No Actions Required
50 - 60	Report to management and continue to closely monitor
60+	Immediately remove waste from the stockpile to the quarantine area and report to management.

All material storage areas are visually inspected by site operatives throughout the day and all findings are logged in the site diary as a minimum. Should signs of self-combustion be identified such as steaming/smoulder/smoke, the pile will be removed to the quarantine area using suitable mobile plant and supressed to dissipate heat. checks of the affected stockpile will be increased to hourly for the remainder of the day to ensure no further hotspot development occurs.

12. Manage Waste Piles

All incoming waste is received, inspected, and sorted within the designated waste transfer and sorting shed. The sorting shed is constructed on an impermeable concrete surface designed to prevent the infiltration of contaminated liquids into the ground. Following segregation, waste is transferred into dedicated storage containers or bays according to waste type.

Combustible waste streams, including wood, cardboard, UPVC, plasterboard, and residual non-recyclable waste, are stored externally within dedicated 40-yard containers. Non-combustible materials, including soils and hardcore, are stored separately within designated inert waste bays. Waste streams are segregated at all times to prevent cross-contamination and to minimise fire risk.

The six 40-yard waste containers are positioned with a minimum separation distance of 6 metres between containers. These separation distances provide access for plant and emergency vehicles and

reduce the potential for fire spread between individual waste streams. Containers are covered when not actively being loaded or unloaded to minimise the risk of ignition from external sources and to prevent windblown litter.

Appendix 4 (Waste Storage Table) provides details of the waste types accepted, maximum storage quantities, storage arrangements, and the location of each waste stream within the site.

Waste is stored in its received form and is not shredded, fragmented, or otherwise processed in a manner that would significantly increase its surface area. Maintaining waste in larger particle sizes reduces the potential for heat build-up and assists in minimising the risk of self-heating and fire.

Although the permit authorises waste storage for up to three months, under normal operating conditions waste is typically removed from site within three to four days of receipt. The Technically Competent Manager (TCM) maintains records of waste movements and storage durations to ensure that a first-in, first-out approach is applied wherever practicable.

The waste sorting shed is constructed on an impermeable concrete surface, providing a suitable area for the inspection, sorting, and handling of incoming waste. External waste storage areas comprise hardstanding surfaces that provide a stable base for the placement of containers, vehicle movements, and waste management activities. Waste will only be stored within designated containers or storage bays and will not be deposited directly onto the site surface.

The TCM will undertake daily inspections of all waste storage areas to verify that waste is being stored in accordance with this Fire Prevention Plan, that separation distances are maintained, and that container capacities are not exceeded. When a container approaches its operational capacity, arrangements will be made for its removal from site and replacement with an empty container.

The Operator will not accept waste beyond the available storage capacity of the site. Incoming waste deliveries are monitored against available container capacity and planned outgoing movements to ensure that waste storage remains within permit limits and can be managed safely and effectively at all times.

13. Where Maximum Pile Sizes do not Apply

All wastes stored on site must comply with the maximum pile sizes as per the Environment Agency Guidelines

14. Prevent Fire Spreading

Waste is be stored within designated storage areas as illustrated on the site plan (Appendix 1).
6m separation distances between waste storage area is implemented at all times.

A fire water calculation will ensure there is enough fire water resource to extinguish the largest stockpile of combustible waste.

15. Quarantine Area

The quarantine area will be used to place burning wastes (if appropriate) to extinguish them. It may also be used to hold unburnt wastes if the burning waste is in another area of site and cannot be relocated to the quarantine area

The quarantine area is located within the permit boundary, as shown on Plan (1) this area is engineered to be impermeable and is fully undercover. The quarantine area is capable of holding 50% of the volume of the largest stockpile on site.

Dependent on the size and location of a fire, the mobile plant on site is capable of quickly clearing an area around the burning waste to provide a flexible quarantine area. The specified quarantine area will be kept clear at all times (unless being used in the event of a fire) If the quarantine area will remain accessible at all times.

In the event of a fire, the following procedure will be put in place:

- During a fire event, the TCM or Manager will inspect the quarantine area.
- Mobile plant will be utilised to move temporarily quarantined material.
- Burning materials or hot waste will be transferred via mobile plant to the quarantine
- The quarantine area has a 6-metre circumference from the site boundary, building and wastes

The location of the quarantine areas is illustrated on Appendix 1 (site plan).

In the event of non-compliant waste being identified it will be immediately moved to the nearest quarantine area and marked with a yellow quarantine sign. The site manager will notify the customer of the non-conforming material within 24 hours of receipt, and arrangements will be made to return the material to the customer at the customer's expense. The quarantine area is illustrated on the site plan. As mentioned previously, the quarantine area can contain at least 50% of the largest waste stockpile. During normal operating conditions to facilitate the dousing of waste with the relevant fire extinguisher/smouldering of waste and the separation of unburnt waste for both waste stored internally and externally. Appropriate PPE would be worn by site operatives. The placement of the quarantine areas is based on the following factors:

- It allows for the prompt and direct removal of smouldering, burning or fire damaged wastes from the waste storage and to allow access by the Fire & Rescue Service (FRS); and
- Proximity to flammable liquids – the quarantine area is situated at least 10m from any potentially flammable liquids on site.

Procedure for using the Quarantine Area

The Site Manager instructs all site operatives when and how the burning waste, or any hot loads delivered accidently to site, will be moved to the quarantine area. The following procedure will be implemented on site:

- When it is safe to do so, the waste will be moved by on site plant to the quarantine area; The movement of the waste will be overseen at all times by the Site Manager or TCM to minimise any spillages and ensure the area is not overfilled;
- To limit any spillages, plant will not be overfilled when moving the waste;
- The burning or smouldering waste will be doused using the relevant fire extinguisher;

- Burnt waste will be taken off site to a suitably permitted facility within 7 days (or sooner depending on WM3 assessment requirements). All site operatives will be trained to follow this FPP and all procedures listed in the above sections

16. Detecting Fires

Waste storage activities take place externally within designated storage containers and bays. The site is not fitted with an automatic fire detection or alarm system within the waste storage areas. Fire detection therefore relies upon routine site inspections, CCTV monitoring, and visual identification of smoke, fire, or abnormal conditions by site personnel.

During operational hours, all waste storage areas are subject to regular monitoring by site operatives and the Technically Competent Manager (TCM). Any indication of fire, smoke, smouldering waste, or elevated temperatures identified during inspections will be treated as an emergency, and the Fire and Rescue Service (FRS) will be contacted immediately.

The site is equipped with a CCTV system that provides coverage of the waste storage areas and can be accessed remotely. Outside normal operating hours, the CCTV system can be reviewed by designated personnel, providing an additional means of identifying potential fire incidents at an early stage.

The site includes two residential dwellings, one of which is occupied by the business owner. As a result, the site benefits from a regular on-site presence outside normal operating hours, increasing the likelihood of the early identification and reporting of any fire or emergency situation. Should a fire be identified outside operational hours, the Fire and Rescue Service will be contacted immediately and the procedures detailed within this Fire Prevention Plan will be implemented.

The nominated site contacts and responsible persons are listed below.

- Luke Hadlow
- Lisa Hills

Out of hours, The following members of staff are keyholders and reside on site;

Key Holder 1 Luke Hadlow	Elysian Fields, Wraik Hill, Whitstable, Kent, CT5 3BY	Resides on site
Key Holder 2 Marc Dent	Elysian Fields, Wraik Hill, Whitstable, Kent, CT5 3BY	Resides on site

The site is continuously monitored by site operatives throughout the working day to ensure the early detection of fires in waste storage area. The area where waste is stored is visually inspected throughout the day by site operatives, and outside of operational hours there are automated detection systems in place to alert key staff to the present of extreme heat or a fire. All findings are logged in the site diary. The site is fully equipped with thermal/CCTV cameras. If a fire is identified on the CCTV, site operatives/TCM/Manager will call the FRS during both operational hours, and outside of operational hours.

As outlined throughout the document, the following procedures will be put in place to detect fires:

- The site will be inspected visually throughout the day and at the end of the day for hot waste and hot exhausts.
- The site will be inspected for heat via the handheld thermal imaging camera throughout the day.
- The CCTV (cameras/monitors) can be remotely viewed via computer or mobile phone (internet offsite monitoring). The system sends notifications to staffs mobile phones and can be programmed in a variety of ways for effective offsite, out of hours monitoring. As there are multiple cameras on site, all areas are covered.
- The site is extremely secure to protect it from arson

17. Suppressing Fires

An automated fire suppression system will not be required. The operator will not be storing waste within 4 sided the building.

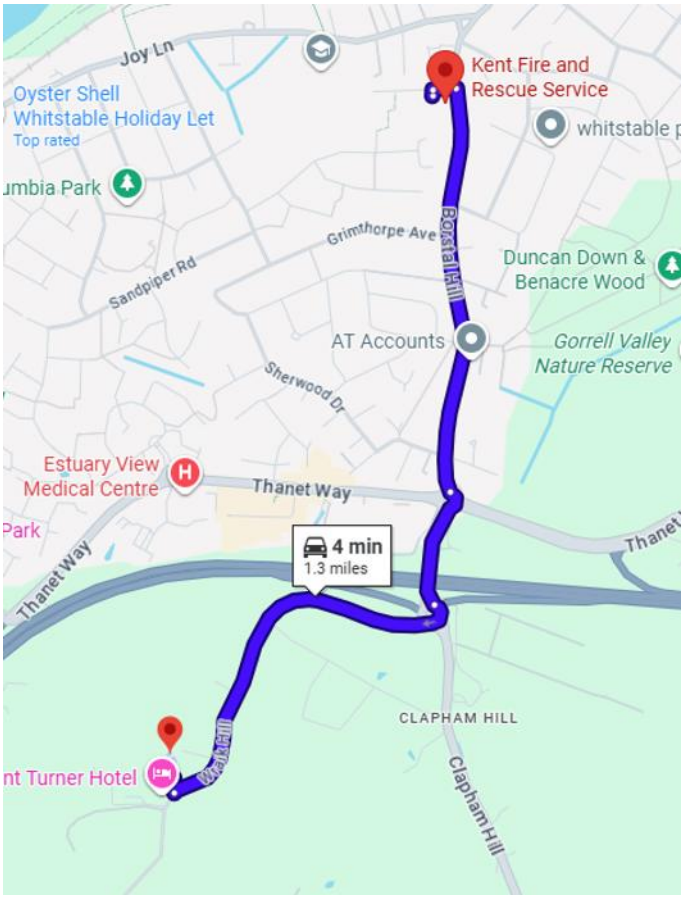
18. Firefighting Techniques

All site staff will be trained to understand the principle that no one should put themselves at risk to fight a fire. Upon the detection of a fire, if it is safe to do so, site staff should attempt to extinguish the fire by utilising the firefighting equipment located on site. Before doing so, the FRA should be contacted in the first instance and followed up by notifying the environment agency's incident reporting service on 0800 80 70 60 within 24 hours.

The site provides the following resources:

- Fire extinguishers located strategically across the site where fire risk is deemed more probable
- Main water which has a flow rate of at least 7 litres per minute
- Thermal rated expanded foam
- Mobile Plant to separate unburnt material from the fire if safe to do so; and
- Mobile Plant to separate burning material from the fire to extinguish it
- Mains hydrant point located within 100m from the site

The closest Fire Station is located is Kent Fire and Rescue. Using google directions and mapping, the drive time is approximately 4 minutes and approximately 1.3 miles from the site.



Fire extinguishers are to be used in the following circumstances:

- Where operators are trained in use, and if confident to tackle the fire; and
- On very small fires, or to facilitate own escape if trapped by fire.

Small Fire
A small fire or area of smouldering waste will be dealt with as follows:

- A fire or area of smouldering waste will not be dealt with in-situ, mobile plant will be utilised to pull the affected waste into a separate container and away from any further waste that could ignite on contact; and
- Depending on the size/nature of the fire the waste will either be: Extinguished immediately utilising the fire extinguishers; or moved to the quarantine area and extinguished.
- Depending on the size, location and nature of the fire the burning waste will be pulled into the quarantine area following the procedures detailed within this fire prevention plan.
- Inert material stored on site can be used via the telehandler to suffocate the fire.

Once a small fire is dealt with the remaining area will be visually inspected immediately by site management for any signs that a fire/smouldering waste remains. The same procedure, detailed in this section, will be implemented should this be the case.

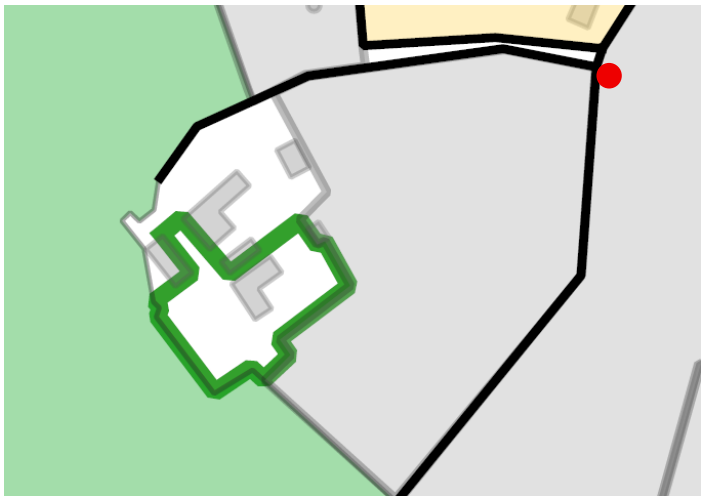
Uncontainable Small Fire or Large Fire
The following procedure is in place on site that will be followed in the event of a small fire becoming uncontainable or in the event of a major fire onsite;

- The Site Manager and FRS will be contacted immediately. The EA will be notified at the first opportune moment, but no longer than 24 hours.
- Following arrival of the FRS, all site staff will take instructions from the FRS
- If possible, waste that is unburnt will be doused with a fire extinguisher to prevent the fire from spreading further;
- If possible, unburned material will be separated from the fire using heavy plant;
- The burning area will be isolated, and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- The site and buildings and immediate fire area will be evacuated.
- Thermal foam will be used to ensure an adequate seal around skips to ensure fire water retention.

19. Water Supplies

The site is serviced by mains water that is available for firefighting activities, however, in isolation this would not carry a sufficient flow rate based on the sites largest stockpile. From EA guidance – the worst case scenario would be the largest waste pile catching fire and a water supply of a least 2,000 litres a minute for a minimum of 3 hours is required for a 300 m3 pile of combustible material if no other actions are taken e.g. fire breaks. The site will maintain adequate fire breaks (by distance) of 6m between the two rows of 40 yard skips.

The nearest hydrant point is located within 100 metres from the site. This is serviced and maintained by the FRS. This has been referenced in Appendix 3 (location plan). This hydrant is serviced and maintained by the FRS. This hydrant also conforms to British Standard 750. This hydrant is accessible for use.






The largest stockpile of combustible waste on site is the waste stored in a 40-yard container and would therefore need no more water than the volume of each container which is approximately 30,600 litres. In reality it will be significantly less than this due to the container containing waste which will take up volumetric space within it.

20. Managing Fire Water

Water used for firefighting activities will be fully contained within the containers. The site will implement systems to ensure containment of discharged fire water runoff from the containers

Containers without a hinge/door will now allow any water run off to escape it. 40 yard skips with a hinge/door may have small gaps where water could potentially escape. The site will be equipped with expanding foam Nullifire FF197. This foam is a fire-rated, single-component polyurethane expanding foam. When applied externally to the skip's seams / vulnerable gaps, it expands to fill these seams and then cures into a semi-rigid cellular foam. In this arrangement, the foam is not directly exposed to the fire inside the skip; the skip wall provides the first barrier, while the foam helps close external escape paths where water could otherwise track through. Its fire-rated formulation gives it an extremely high resistance to heat than standard expanding foam, making it more suitable where the skip shell may become hot during an internal fire. This will seal the skip to prevent discharged fire water from escaping.


Nullifire
Smart Protection

Technical Data Sheet

FF197

Fire Rated PU Construction Foam

19-02-2025 / V 1

Description

FF197 is a modified, single component, fire rated polyurethane foam used to seal door frames, window frames and linear gaps throughout the fire rated areas of a building.

up to 240 mins

ETA CE

certifire

Fire Resistance Temperature:
The Foam is approved to standards BS EN 1366-4 fire-rated with standard fire curve where temperatures rise approximately as follows:

Time
Furnace Temperature
5 minutes
~576°C
10 minutes
~679°C
30 minutes
~842°C
60 minutes
~945°C
90 minutes
~1,006°C
120 minutes
~1,049°C
240 minutes
~1,153°C

21. During and After an Incident

The Operator would cease operations until the Environment Agency / Fire Service advised that the site could be reopened. The Operator has outlets in place to divert wastes as required.

The Operator will inform those who may be affected by fire, such as nearby residents and businesses, via word of mouth. During fire event training sessions, specific site staff will be given specific areas to visit during a fire event – the site staff will be asked to inform those affected that there is a fire event on site, and will give useful information such as to close windows and doors if possible and to avoid the area until the fire is under control. The site staff will also pass on any specific instructions from the FRS.

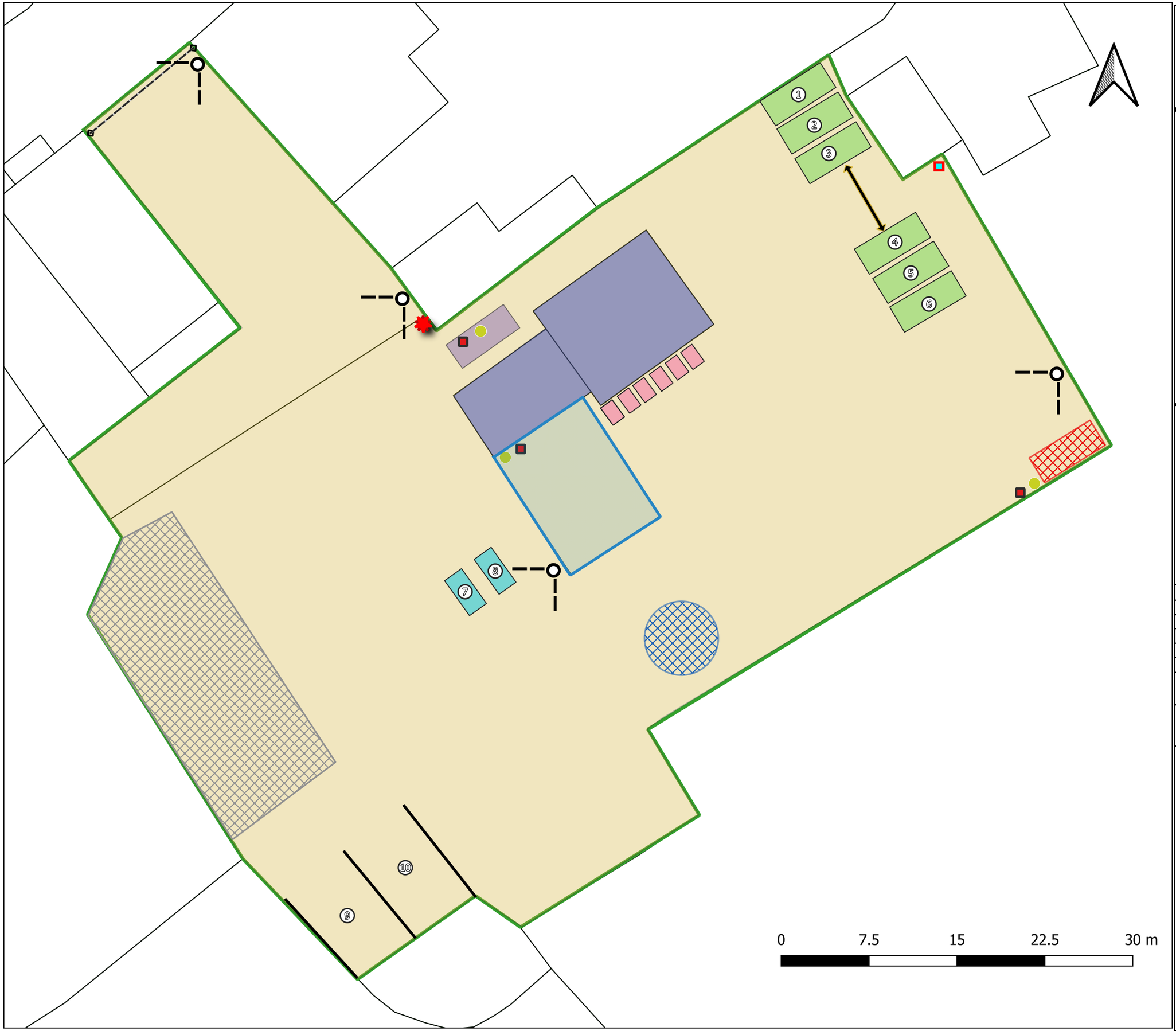
The Operator will ensure that if the waste has become hazardous in nature as a result of the fire, the waste will be tested and assessed prior to removal from site, and that consignment notes will be issued in transit to the receiving site. The receiving site will be fully permitted and aware of the potential hazards associated with the wastes.

Any fire water that is contained within the containers will be pumped via a tanker. The Operator will ensure that all fire-damaged waste is be removed using an appropriate EWC codes.
This FPP is considered to be a 'working' document that is reviewed and updated annually internally or as required should any of the following occur:

- A fire or near miss of a fire on site;
- A change or review of legislation;
- A change in the environment surrounding the site;
- A change to operations on site; or
- If the site is instructed to do so by the EA.

It is the responsibility of the TCM and Site Manager or nominated person to maintain this FPP and to ensure it is adhered to in the event of a fire on site.

Appendix 1 –



Key:

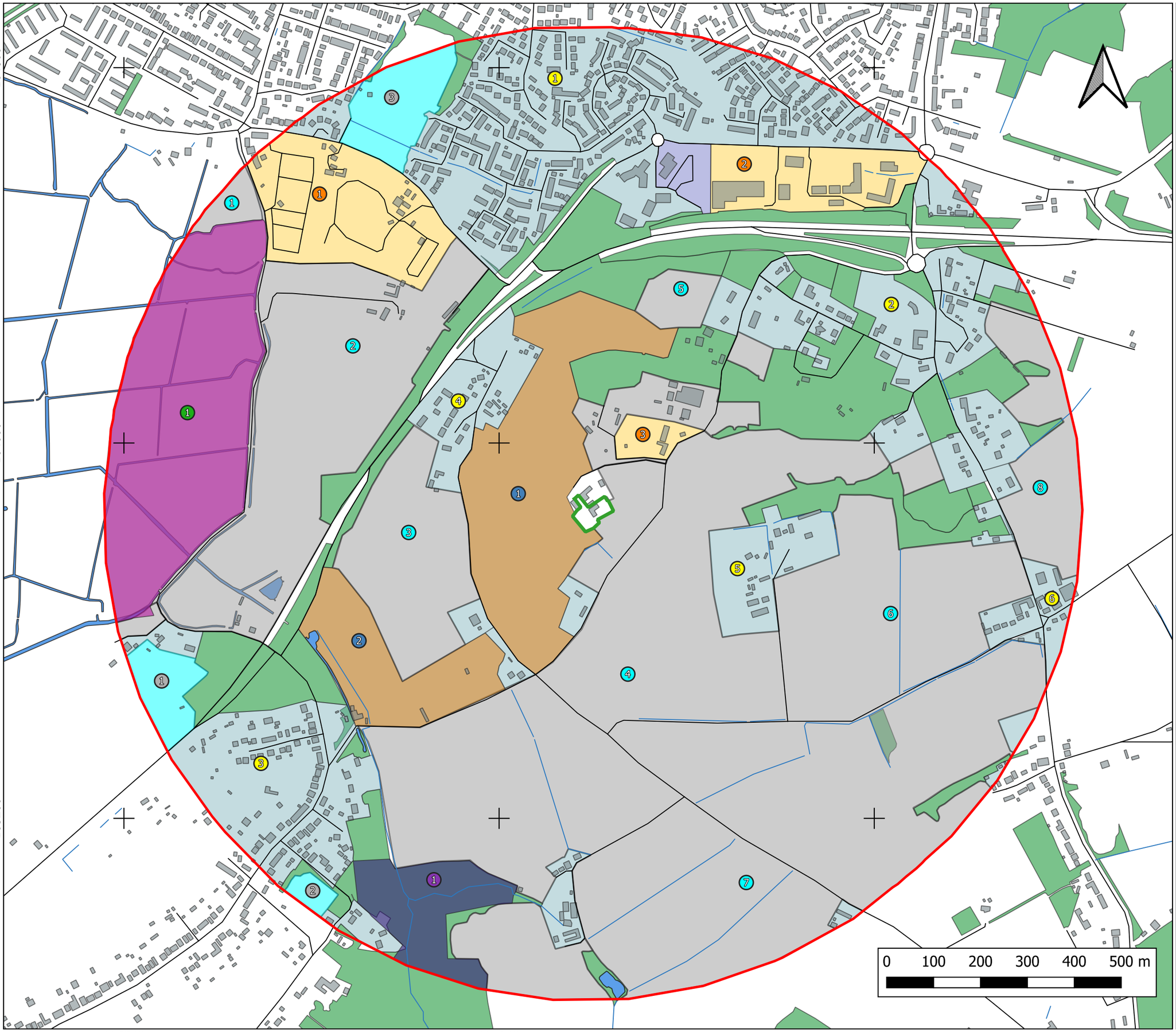
- Permit Boundary
- 6m Buffer
- Bunded Kerb
- Lego Block Bay
- Main Site Entrance
- Diesel Tank
- Fire Extinguisher
- Spill kit
- 4 Yard Skips
- 40 Yard Ro-Ro
- COSHH Storage
- HardStanding
- Mobile Plant Storage
- Quarantine Container
- Skip Storage
- Sorting Shed / Impermeable area
- 8 Yard Skips
- Workshop
- Fire Rated Foam Storage
- CCTV

Drawing Title:SL Plan Wraik Hill Recycling
Ref: 004.2_09_004
Scale: 1:12093 (A3)
Date: 2026-06-11
Revison: V1
Drawn By: Teddy Griffiths
Address: Elysian Fields, Wraik Hill, Whistable, CT5 3BY

Changelog:
- N/A

THE PERMITTING COMPANY

Appendix 2 –



Key:
- Buffered
- Permit Boundary
- TR_SurfaceWater_Line
- Road
- Agricultural ID
- Commercial ID
- Local Wildlife ID
- Public Use ID
- Residential ID
- SSSI - Ellenden Wood ID
- The Swale SSSI ID
- Surface Water Area
- Woodland
- Agricultural Area
- Commercial Area
- Local Wildlife Site
- Medical Establishment
- Public Use Area
- Residential Area
- SSSI - Ellenden Wood
- SSSI - The Swale
- Building

Drawing Title: Sensitive Receptor - Wraik Hill Recycling

Ref:

Scale: 1:12093 (A3)

Date: 2026-06-11

Revison: V1

Drawn By: Teddy Griffiths

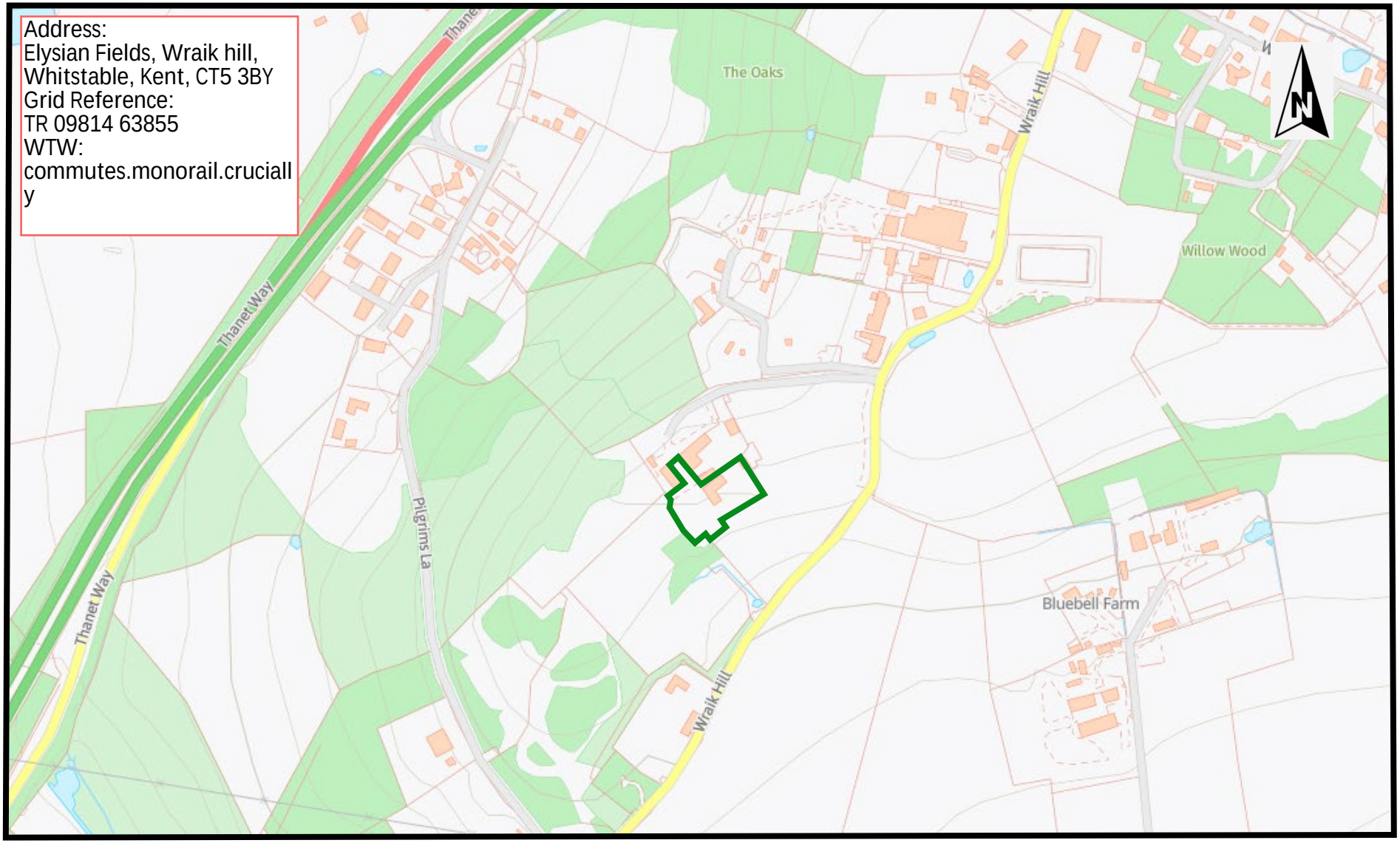
Address: Elysian Fields, Wraik Hill, Whistable, CT5 3BY

Changelog:
- N/A

THE PERMITTING COMPANY

Appendix 3 –

Site Location Plan



Appendix 4 –

Waste Table

Waste Type	Max Volume	Size Of Pile or Container W x L x H	Location on Site Plan	Max Time on Site	Combustible Y/N	Fraction Range
Plasterboard	31 M3	2.4 X 6 X 2.4	Storage area 1	90 Days	Yes	Above 150 mm
Cardboard/Paper	31 M3	2.4 X 6 X 2.4	Storage area 2	90 Days	Yes	Above 150 mm
UPVC	31 M3	2.4 X 6 X 2.4	Storage area 3	90 Days	Yes	Above 150 mm
Scrap Metal (Ferrous)	31 M3	2.4 X 6 X 2.4	Storage area 4	90 Days	Yes	Above 150 mm
General non-recyclable	31 M3	2.4 X 6 X 2.4	Storage area 5	90 Days	Yes	Above 150 mm
Wood	31 M3	2.4 X 6 X 2.4	Storage area 6	90 Days	Yes	Above 150 mm
Quarantine Area	31 M3	2.4 X 6 X 2.4	Quarantine Container	Dynamic	Yes	Above 150 mm
General non-recyclable	6 M3	1.7 X 3.4 X 1.2	Storage area 7	90 Days	Yes	Above 150 mm
General non-recyclable	6 M3	1.7 X 3.4 X 1.2	Storage area 8	90 Days	Yes	Above 150 mm
Soil (Inert)	130 M3	Dynamic due to bulk density	Storage area 9	90 Days	No	Above 150 mm
Hardcore (Inert)	130 M3	Dynamic due to bulk density	Storage area 10	90 Days	No	Above 150 mm

Appendix 5 -

Fire Rescue Service Access Plan – Wraik Hill Recycling Limited

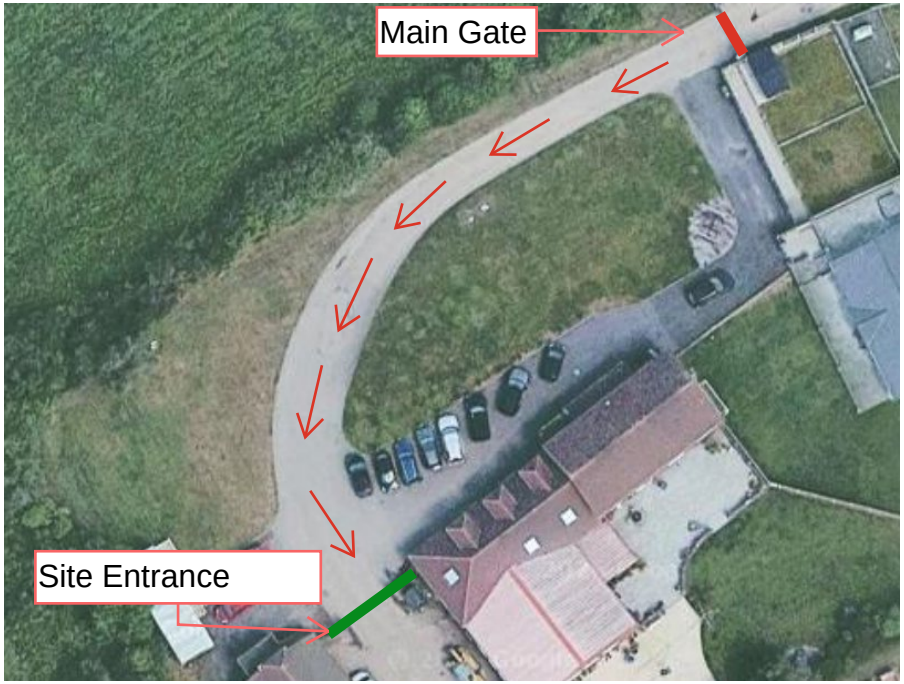
FRS Route to site



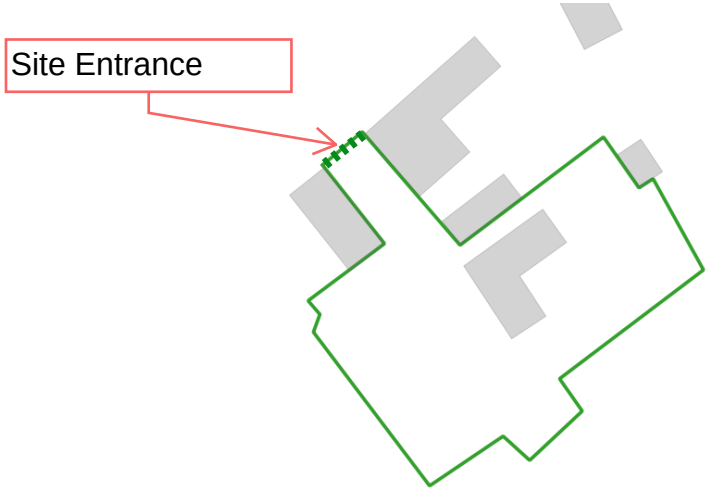
Main Gate



Main Gate to Site Entrance



Site Entrance



Appendix 6 –

Wraik Hill Recycling – Spillage Procedure

1. Purpose

To ensure that all spillages (oil, fuel, hydraulic fluids, battery acid, coolants, or other hazardous substances) are dealt with promptly, safely, and in compliance with environmental regulations.

2. Responsibilities

- All Employees – must report and respond to any spillage immediately.

- Site Supervisor – ensures spillages are contained, cleaned, recorded, and reported.

- Environmental Manager – oversees disposal of contaminated materials and maintains spillage records.

3. Immediate Actions in the Event of a Spill

1. Stop Work Safely – Cease operations in the affected area. Eliminate sources of ignition if fuel or flammable substances are involved.

2. Raise the Alarm – Notify the site supervisor immediately. If the spillage presents an immediate danger (fire, chemical reaction, or health hazard), initiate emergency evacuation procedures.

3. Assess the Spill – Identify the substance (oil, fuel, coolant, battery acid, etc.). Estimate size and potential impact (minor, moderate, major).

4. Containment and Control

• Small Spills (under 20 litres) – Use spill kits, absorbent pads, or granules. Prevent entry into drains, soil, or watercourses.

• Large Spills (over 20 litres) – Create barriers with spill booms, absorbent socks, or sand. Stop source of leak if safe to do so. Call for additional assistance (fire service if uncontrolled or entering water).

• Battery Acid or Chemical Spills – Use acid-neutralising absorbents. Avoid direct contact – wear chemical-resistant PPE.

5. Clean-Up Procedure

1. Collect used absorbent material and place in labelled, sealed containers.

2. Remove contaminated soil, if applicable, and store for correct disposal.

3. Clean hard surfaces with appropriate cleaning agents.

4. Dispose of waste via licensed hazardous waste contractor.

6. PPE Requirements

- High visibility vest/jacket

- Safety boots

- Gloves (oil-resistant or chemical-resistant as appropriate)

- Safety goggles / face shield for acid or chemical spills

- Respiratory protection if fumes are present

7. Reporting and Documentation

• Record all spillages in the Spillage Log (date, time, material, quantity, cause, actions taken).

• Report significant spills to the Environment Agency if there is risk of pollution.

• Conduct an investigation for major spills to prevent recurrence.

8. Prevention Measures

• Regular equipment maintenance to prevent leaks.

• Secondary containment for fuel and oil storage.

• Spill kits located at all high-risk areas (workshop, fuel store, battery storage).

• Staff trained annually on spill response.

Important: Any spillage that enters a drain, watercourse, or leaves site boundaries must be reported immediately to the Environmental Manager and the Environment Agency.

Appendix 7 –

Date: **Weather Conditions:** **Wind Speed:** **Wind Direction:**

Condition of the site perimeter		**Condition of impermeable surfaces**		**Noise levels**	
Thermal Camera in use/working		**Site security systems**		**Pests/vermin**	
Fixed plant/equipment in good repair		**Condition of site building**		**Site infrastructure in good repair**	
Site noticeboard present & in good repair		**Quarantine area clear for deposit**		**TCM attendance meets permit requirements**	
All waste stored on-site is compliant		**Litter**		**Portable extinguishers checked and in place**	
Non-compliant waste quarantined		**Mud/debris**		**Compliance with the duty of care documentation**	
Mobile plant in good repair		**Dust & Fluff not accumulating**		**Spill kits in place**	
Waste volumes on-site compliant		**Odours**		**Fire equipment in place**	

Daily checks		
Check	Time	Comments
FPP Measures Implemented		
Sandbag visual assessment for damage/quantity		
Interceptor balloon in place		

Weekly checks		
Check	Date	Comments/Actions
Fire Alarm Check		
Fire Equipment Checks		
Other (please specify)		

Thermal checks		
Check	Time	Temperature/Comments/Actions
Thermal Check 1	08:00	
Thermal Check 2	12:00	
Thermal Check 3	16:00	

Details of any construction work, Maintenance, Breakdowns, Emergencies, Environmental Problems or Severe Weather Conditions affecting Waste Management Activities on site	

General site activities, complaints, non-compliance details	
	Operating hours
	Start:
	End:
	Site Name
	Staff on site
	TCM on site
	Name:
	Date:
	Time in:
	Time out:
	Sign:

Appendix 8 –

Fire Prevention Plan
Staff Training Tool

Wraik Hill Recycling - Elysian Fields, Wraik Hill, Whitstable, Kent, CT5 3BY

Concise staff briefing, quiz and training record

Source document	Fire Prevention Plan V1 - PT-FPP-V1
Training audience	All site staff, contractors and relevant visitors
When to deliver	Induction, then refresher training every 6 months, and after changes/incidents
Trainer	Site Manager / TCM / nominated competent person
Purpose	Make sure staff can prevent fires, spot early warning signs, respond safely, and contain fire water

Important: Staff safety comes first. No person should put themselves at risk to fight a fire. Report, raise the alarm, and follow site management and Fire and Rescue Service instructions.

1. Training aim and key objectives

- By the end of this briefing, staff should know how to prevent fires, inspect waste and plant, identify early signs of heat/fire, use the quarantine procedure, contact the right people, and support fire-water containment.
- The Fire Prevention Plan has three core objectives: minimise the likelihood of a fire, aim to extinguish any fire within 4 hours, and minimise fire spread within the site and to neighbouring sites.

2. Site operations and combustible waste

- The site receives skip waste, mainly from construction and demolition activities. Waste is tipped into the sorting shed, manually sorted, and stored in dedicated waste streams.
- Combustible wastes include wood, plastics, paper/cardboard, bulky waste, UPVC/plastics, plasterboard and residual mixed waste. Combustible waste is stored in external 40-yard containers, with smaller 8-yard containers also present.

3. Main fire risks staff must control

- Arson and security breaches: keep gates, fencing, doors, locks and CCTV arrangements effective. Report any defect or suspicious activity immediately.
- Plant and hot exhausts: plant must be checked, maintained, cleaned down, isolated at the end of the day and kept at least 6 m from combustible waste when not in use.
- Smoking, hot works and ignition sources: smoking is only allowed in the designated smoking area. Hot works require controls, separation, screens, a permit-to-work and a fire watch.
- Electrical faults, leaks, spillages and dust/fluff build-up must be reported and managed immediately.

4. Waste storage rules

- Use designated containers and storage areas only. Do not allow waste to be stored outside approved areas.
- Maintain 6 m separation between combustible waste containers and storage areas where required. Keep containers covered when not actively loading or unloading.
- Do not exceed available storage capacity. Waste should be moved on a first-in, first-out basis where practicable and removed from site promptly.
- The site permit limits are no more than 75,000 tonnes per year, no more than 300 tonnes on site at one time, and no waste kept longer than 3 months.

5. Daily checks and temperature monitoring

- Staff must remain vigilant throughout the day and during end-of-day checks. Look for smoke, steam, smouldering, unusual smells, hot surfaces, leaking fluids, damaged cables, poor housekeeping and non-conforming waste.

- Thermal imaging/heat monitoring is used to identify abnormal temperatures. 0-50°C requires no action; 50-60°C must be reported to management and monitored closely; 60°C+ requires immediate removal to quarantine and management notification.
- Loose combustible waste, dust and fluff must be removed, especially if near an ignition or heat source.

6. Hot loads and non-conforming waste

- Burning, reacting, visibly hot, steaming or smoking loads must not be accepted into normal storage.
- If safe, suspect material must be isolated in the quarantine area, marked, recorded, and reported to the Site Manager/TCM. Non-conforming waste arrangements must be made with the customer or a suitable permitted facility.

7. Quarantine area

- The quarantine area must be kept clear, available and accessible at all times. It is used for hot loads, suspect/rejected waste, smouldering waste, burning waste where safe to move, and isolated fire-damaged material.
- Only move hot or burning waste when safe and under instruction from the Site Manager/TCM or Fire and Rescue Service. Mobile plant may be used to isolate waste, create fire breaks, or move material into quarantine.

8. What to do if fire or smoke is found

- Raise the alarm and notify the Site Manager/TCM/Fire Marshal immediately. Contact the Fire and Rescue Service immediately.
- Do not take risks. Only use fire extinguishers if trained, confident, and it is safe. Fire extinguishers are for very small fires or to help escape if trapped.
- For a small fire, affected waste should not be dealt with in situ if it can be safely separated. Mobile plant may be used to pull affected waste away, move it to quarantine, and prevent fire spread.
- For a large or uncontainable fire, evacuate the site/buildings/immediate area, await the Fire and Rescue Service, and follow their instructions. Notify the Environment Agency incident service within 24 hours.

9. Fire-water containment

- Fire water must be contained to prevent contaminated runoff leaving site. Skips/containers are intended to act as the main containment vessel where water is applied to waste inside them.
- For 40-yard skips with doors, hinges, seams or vulnerable gaps, external sealing arrangements may be used to reduce escape of fire water. The plan identifies fire-rated expanding foam as part of the site resources and describes using Nullifire FF197 externally to seal vulnerable skip gaps.
- The foam is a supporting seal only. It should be applied to external seams/gaps where safe to do so and supported by good skip condition, inspection, containment arrangements and management control.

10. Records and refresher training

- Fire training, drills, inspections, defects, actions taken, hot loads, security issues, spillages and incidents must be recorded in the site diary or relevant site record.
- New staff and contractors receive training during induction. Existing staff and contractors receive refresher training every 6 months. Fire drills and plan tests are also carried out every 6 months.

Quick Staff Checklist

Stage	What staff must do	Done/initials
Start of shift	Check gates/fencing/security, look for smoke/heat, check plant, check extinguishers/access routes, confirm quarantine area is clear.	
During operations	Watch incoming loads, reject hot/non-conforming waste, keep separation distances, clean loose waste/dust/fluff, report defects.	
Waste storage	Use designated containers only, keep covers on when not loading/unloading, do not exceed capacity, maintain 6 m separation.	
Temperature concern	50-60°C: report and monitor closely. 60°C+: isolate/remove to quarantine and report immediately.	
Fire/smoke found	Raise alarm, call FRS, notify manager/TCM/fire marshal, do not take risks, only tackle if trained and safe.	
After incident	Record actions, keep fire-damaged waste isolated, arrange removal, notify EA within 24 hours where required.	

Quiz Sheet - Staff Knowledge Check

Complete after the briefing. Trainer to review answers and revisit any weak areas before sign-off.

No.	Question	Answer / notes
1	What are the three main objectives of the Fire Prevention Plan?	
2	Name four common causes of fire that staff must control on site.	
3	What should staff look for when checking incoming loads?	
4	What minimum separation distance is required between combustible waste containers/storage areas?	
5	What temperature range must be reported to management and closely monitored?	
6	What action is required if waste reaches 60°C or above?	
7	When is the quarantine area used?	
8	What is the first thing staff should do if they see smoke, fire or smouldering waste?	
9	When should staff use fire extinguishers?	
10	Why is fire-water containment important?	
11	How can externally applied fire-rated expanding foam help with skip fire-water containment?	
12	Where is the Fire Prevention Plan kept and when must staff be trained?	

Trainer Answer Guide

Question	Expected answer
1	Minimise likelihood of fire; aim to extinguish within 4 hours; minimise spread within site and to neighbouring sites.
2	Examples: arson/security, hot exhausts, smoking materials, hot works, electrical faults, fuel/oil leaks, dust/fluff build-up, hot loads, incompatible wastes.
3	Smoke, steam, heat, smouldering, unusual smells, reactive material, non-permitted or incompatible waste.
4	6 metres.
5	50-60°C.
6	Immediately remove/isolate to quarantine where safe and report to management.
7	Hot loads, suspect/non-conforming waste, smouldering/burning waste where safe, and isolated fire-damaged material.
8	Raise alarm, notify management/fire marshal, and contact Fire and Rescue Service immediately.
9	Only if trained, confident and safe; on very small fires or to aid escape.
10	To prevent contaminated runoff leaving site and causing pollution/environmental harm.
11	It can be applied externally to vulnerable seams/gaps to expand and form a heat-resistant supporting seal, helping reduce escape paths for retained water.
12	In the clearly marked Red Folder/site file. Training at induction and every 6 months, plus after changes/incidents as needed.

Staff Training Record

Trainer to complete and retain this record with site training records. Tick the topics covered and obtain staff signatures.

Training title	Fire Prevention Plan staff training	**Date**	
Trainer		**Location**	
Document ref	PT-FPP-V1	**Version**	1.0
Training type	Induction / refresher / post-incident / other	**Next refresher due**	

Topics covered

Topic	Covered
FPP objectives	☐
Site fire risks	☐
Waste acceptance/hot loads	☐
Waste storage and 6 m separation	☐
Daily checks and thermal monitoring	☐
Quarantine area	☐
Emergency actions and evacuation	☐
Fire extinguishers - only if trained/safe	☐
Fire-water containment	☐
Records, reporting and refresher training	☐

Attendee sign-off

Name	Role/company	Signature	Quiz score	Passed?	Date

Trainer declaration: I confirm that the above staff received training on the Fire Prevention Plan and had the opportunity to ask questions. Any incorrect quiz answers were reviewed before sign-off.

Trainer signature: _____

Date: _____

Appendix 9 –

Appendix 9 – CF - 05 FIRE SAFETY AUDIT CHECKLIST

	YES	NO	N/A	COMMENTS
Daily Checks (not normally recorded)				
Escape Routes				
Can all fire exits be opened immediately and easily?				
Are fire doors clear of obstruction?				
Are escape route clear?				
Fire Warning Systems				
Is the main indicator panel showing “normal”?				
Are alarms / sirens / sounders in their correct place?				
Escape Lighting				
Are lights and exit signs in good condition?				
Is the emergency lighting and signs working normally?				
Firefighting Equipment				
Are all fire extinguishers in place?				
Are all fire extinguishers clearly visible?				
Are all fire hydrants accessible for the fire service?				
Weekly Checks				
Escape Routes				
Do all emergency fastening devices work correctly?				
Are fire doors clear of obstruction?				
Are all external escape routes clear?				
Fire Warning Systems				
Did the fire alarm work correctly when tested?				
Did staff and all others hear the alarm working?				
Did any linked fire protection system operate correctly?				
Escape Lighting				
Are charging indicators visible and illuminated?				
Fire fighting Equipment				
Are all fire fighting equipment in working order?				
Are all fire extinguishers mounted 1 - 1½ metres?				
Monthly Checks				
Escape Routes				
Are all door seals and intumescent strips in good condition?				
Are all external stairs in good condition and non-slip?				
Do all internal fire doors close against their rebate / stop?				
Escape Lighting				
Do all lights and exit signs working when tested?				

Are emergency generators working correctly?				
Firefighting Equipment				
Is the "pressure" in stored pressure extinguishers correct?				

Six Monthly Checks

General				
Has the emergency evacuation lift (if fitted) been tested?				
Have sprinkler systems been tested by a competent person?				
Have release and closing mechanisms on fire resisting compartment doors and shutters been tested?				
Fire Warning Systems				
Has the system been checked by a competent person?				
Escape Lighting				
Do all lights work for a third of their rated value?				

Annual Checks

Escape Routes				
Do all fire doors work correctly?				
Is escape route compartmentation in good condition?				
Fire Warning Systems				
Has the system been checked by a competent person?				
Escape Lighting				
Do all lights operate on test for their full duration?				
Has the system been checked by a competent person?				
Firefighting Equipment				
Has all equipment been checked by a competent person?				

Miscellaneous

Have dry / wet risers been tested by a competent person?				
Has smoke control systems been tested by a competent person?				
Has external access for the fire and rescue service been checked for availability at all times?				
Have any fire fighters switches been tested?				
Are fire assembly points clearly indicated by signs?				

Fire Plan Checks Daily

Is the Fire Plan available to all site staff?				
Are the waste stockpiles at required size?				
Are fire breaks and quarantine areas clear?				
Is the 1m freeboard clear?				
Has loose waste been cleared?				

Appendix 10 –

Appendix 8 EMERGENCY ACTIONS

THIS PLAN WILL BE ACTIVATED WITHOUT DELAY WHEN
• A fire is confirmed on site • An uncontrolled event occurs which could reasonably be expected to lead to a fire on site • A major accident is an occurrence (including in particular a major emission, or explosion) resulting from uncontrolled developments in the course of the operations, and leading to serious dangerto human health or the environment, immediate or delayed, inside or outside the establishment.

THE FOLLOWING PEOPLE WILL BE RESPONSIBLE FOR ACTIVATING THE PLAN
Luke Hadlow – Director Site Manager / Authorised Person

HOW THE PLAN WILL BE ACTIVATED
A member of RGE Recycling Limited staff from the above list will make a 999 telephone call to each of the relevant emergency services. Note that the order in which each service is called will be dependent on the nature of the incident. Emergency Services 999 Environment Agency 0800 80 70 60 Waterboard 0330 3030368 County Council 03000414141
Whitstable Fire Station 01622692121
Herne Bay Police Station 01622690690
When making each '999' call staff should provide the following information: • Elysian Fields, Wraik hill, Whitstable, Kent, CT5 3BY • the National Grid Reference for the site: TR 09814 63855' (the site entrance) • Details of the Incident • If any staff are known to be reported missing • Where the arriving first responders will be met (in a safe location, away from any smoke plume with all relevant information on the details of the incident and a copy of this plan)