AC ENVIRONMENTAL CONSULTING

Fire Prevention Plan

Milton Gough

Shaw Lane, Cudworth

Barnsley, S71 3HJ

April 2026

Ref: MG.PT.FPP.2604.R01

AC Environmental Consulting Ltd

Environment House,

Werrington Road,

Stoke-on-Trent

ST2 9AF

Reference & Revision	Issue	Prepared	Approved
MG.PT.FPP.2604 – R01	**2**	**SD**	**DA**

CONTENTS

1. Introduction 4
2. Amount and Type of Waste Received weekly 6
3. Material Storage Quantities 7
4. Material Storage Duration 8
5. Combustible Storage Dimensions (Maximum) 10
6. Control and Sources of Ignition 12
7. Waste Acceptance 14
8. Quarantine Area 15
9. Fire detection and prevention measures 16
Fire Prevention And Detection Measures 16
9.2 Fire Watch 17
9.3 Inspections and Monitoring 18
9.4 Site Design 18
9.5 Drainage 20
9.6 Incoming Waste 20
9.7 Security 20
9.8 Housekeeping 21
9.9 Storage of Combustible Materials 22
9.10 Fire Exercises 23
9.11 Plant and Vehicles 23
9.12 Plant & Vehicle Maintenance 24
9.13 Training 25
9.14 Electrical Safety 25
10. Incident Management 25
11. Fire Suppression 26
11.1 Fire Extinguishers 27
11.2 Automatic Fire Suppression 27
12. Fire and Rescue Service 27
13. Water Supply 28
14. Fire Water Containment 28
15. Sensitive Receptors 30
16. Products Of Combustion 31
16.2 Storage and Disposal of Residues 32
16.3 Staff Training & Awareness 33
17. Fire Procedure 33

Appendix 1 – Fire prevention plan layout: 260310MG101 35
Appendix 2 – site location plan layout: 260310MG101 36
Appendix 3 – Sensitive receptors plan REF: 260310MG101 37
Appendix 4 – Contact Details For Sensitive Receptors 38
Appendix 5 – Fire Watch Form 39
Appendix 6 – Fire Watch Procedure 40
Appendix 7 – Site Inspection Procedure 42
Appendix 8 – Hydrosnakes 44

1. INTRODUCTION

1.1 This Fire Prevention Plan has been formulated to satisfy the requirements of Milton Gough Ltd and reflects the guidance detailed within the Environment Agency document Fire Prevention Plans: environmental permits (published 29th July 2016 and subsequently revised).

1.2 Milton Gough Ltd is a car breaker and de-polluter which operates under a standard rules environmental permit

1.3 The permitted site is located on an approximately 4000m^2 area of land on the outskirts of Barnsley, South Yorkshire. The site is mainly outdoors, except for an office building, depollution building, along with 2 buildings and an ISO container for storing car parts. Access to the site is via a short drive way off Shaw Lane, which will be the route which the FRS will take in the event of a fire and will be maintained so that there is appropriate room for a fire truck at all times. The fire hydrant which the site will use for fire water is also positioned on this access road. The depollution shed sits in the north western corner of the site. This involves a single car lift, two IBCs for waste lead acid batteries, two IBCs for waste oil, one IBC for waste antifreeze and an oil rag/filter bin. Any petrol or diesel recovered during the depollution process will be placed into the forklift or one of the staff vehicles. Depolluted ELVs take up most of the yard with the southern portion of the site being able to hold up to 126 vehicles. These vehicles are stored in 6 stockpiles of varying size, each with a 6m separation gap, the largest consisting of 32 vehicles (320m^3). The site features a 160m^2 quarantine area for non conforming waste or hot loads which may enter the site, accommodating half of the largest stockpile, in line with Environment Agency guidelines. The only mobile plant on site is a forklift, which is stored in the external yard, more than 6m away from any combustible materials. The forklift and depollution lift are fitted with extinguishers which will be inspected as part of daily fire prevention routines to ensure they are in the correct pressure band. The site also includes an area for resale tyre storage in the north western area of the site on impermeable concrete, and a further three covered areas for parts storage also in this area of the site. Engines are stored to the east of the depollution shed on impermeable concrete and are wiped down to remove all traces of oil and debris ahead of storage. The topography of the site dictates that any runoff which comes into contact with engines or tyres will flow north into the drainage sump, removing the risk of any contaminated runoff entering the local environment. Where stockpiles are within 6m of a boundary there is a concrete fire wall between the site, the neighbouring woodland and any neighbouring sites. . Where the site perimeter is not fireproof, it is bordered by a concrete access road on which no combustible material will be stored which reduces the risk of fire spreading between sites. Where there is combustible material stored on a neighbouring site within 6m of the Milton Gough's boundary, the concrete panel fence

will act as a firebreak. ELVs will be processed immediately meaning that all ELV waste storage is allocated to depolluted ELVs. As these ELVs are depolluted, they are considered low risk waste and can easily be moved around using the forklift in order to mitigate any potential fire risk. Where possible, wastes have 6m separation distances between them, however for some wastes it makes sense in terms of operations to keep them near each other. For example, the depollution area houses an ELV in the process of depollution along with products of depollution (waste contaminant liquids, batteries and oil filters/rags). Fire mitigation measures include storing these wastes in the correct designated containers, removing the wastes from site to a permitted facility when these containers become full or after an allocated period to reduce the risk of self heating and combustion, and subjecting the stockpiles to daily procedures to minimise the likelihood of combustion and meet the aims of the FPP guidance. CATs are immediately transferred to a site vehicle and are removed at the end of each working day. The site is designed for ease of access and movement, with ample room for the FRS to access waste stockpiles.

1.4 The site perimeter consists of 3m and 4m high concrete panel fencing (south and west), 2m and 3m high steel sheet fencing (north) and 2m high mesh (east) and palisade (east and north) fencing. The steel sheet and concrete panel fencing is dug into the ground so that runoff cannot leave the site. Where the mesh fencing borders the site, the yard is approximately 20cm lower than the neighbouring land so that surface runoff can't leave the site here. Site operatives will be on hand with hydrosnakes if any runoff appears to be heading towards the palisade fencing, however this is unlikely as all site runoff naturally drains into a 3000L sump in the north east of the yard. The site also features a CCTV system, which covers each external waste stockpile through 3 cameras – 2 located on the site office and a 3rd located on the eastern boundary.

1.5 Regarding site operations, there will be one ELV in the depollution area at any one time. ELVs will be depolluted immediately on arrival to site. Batteries will be removed from the ELVs immediately upon receipt prior to the depollution process. These are then stored in two Cemo 610L battery boxes, upright with the terminals taped or capped to minimise the risk of sparking and ignition. A maximum of one ELV will be depolluted in the depollution area at any one time, which will take no longer than a few hours. Once an ELV has been depolluted, it is then transferred to a designated stockpile in the southern portion of the site for further parts stripping before removal off site by a suitable permitted waste carrier. All depollution operations will take place on an impermeable concrete surface in a building with a sleeping policeman across the entrance, which will act as a bund in the event of any waste contaminant liquid spillages.

1.6 The site is fully covered with a mixture of impermeable concrete and compacted hardstanding to block a potential pollution pathway into the ground. The site features an on site drainage system consisting of a 3000L tank situated on the northern border of the site (lowest part) to collect any surface runoff from the site. Runoff will enter this tank and be retained on site thanks to the topography of the site and a number of boundary treatments as outlined in section 1.4. The tank will be emptied by a suitably permitted waste carrier when it becomes full – site management will monitor the level of the tank on a daily basis, at the start and end of working hours. . Waste fluids (waste oil and antifreeze) are stored in 1000L IBCs to prevent spillages. These are located in the depollution area. Furthermore, all IBC spillages and leaks will be held with the building using the impermeable brick walls of the building and a sleeping policeman across the entrance to the building. Any spillages which may occur in the depollution bay will be treated by spill kits located next to the bunded drums to further prevent the risk of contaminated runoff.

1.7 CCTV on site includes a total of three cameras covering all stockpiles in the external yard. The depollution building features a smoke alarm which will notify site management if activated, and is secured by heavy duty locked steel roller shutters.

1.8 There is an office area within the building in the north east corner of the site. The office is in addition to the depollution area, waste storage and parts storage. All wastes are clearly separated from each other and from the storage of parts within the building.

1.9 The permitted area is secured by a mixture of concrete panel fencing, mesh fencing, palisade fencing and sheet steel fencing. It is bunded by a mixture of the boundary itself, the topography and hydrosnakes if necessary. To the north of the site beyond Shaw lane are a number of commercial/industrial operations of a similar nature, including other ELV and waste operations. The same can be said for the area to the east and south of the site however beyond the other industrial operations is the Dearne Valley Wetlands SSSI featuring areas of marsh and woodland. The SSSI wraps around the industrial complex to the west of the site where it immediately borders the operation beyond the large concrete panel fence. Beyond the 25m of woodland to the west is a railway line.

2. AMOUNT AND TYPE OF WASTE RECEIVED WEEKLY

Material Type	Form	Amount (Weekly)
Scrap Metal	Pre Purchased ELVs, for the purpose of depollution and parts resale	Average: 20 tonnes Range: 10 – 30 tonnes

3. MATERIAL STORAGE QUANTITIES

3.1 ELVs are not accepted from visitors to site. ELVs are purchased before being delivered to the site where immediate depollution takes place.

3.2 Materials stored in a single area will be stored in clear separated stockpiles of a maximum size as shown below.

3.3 The site will accept a relatively low throughput of around 20 ELVs per week. At any one time, there will only be one un-depolluted ELV on site, the delivery of which will have been pre arranged by site management. Site management will organise the deliveries of ELVs so that only one undepolluted ELV is present on site at any one time. Batteries are removed from the ELVs immediately upon receipt prior to the depollution process. These are then stored in the Cemo 610L or similar approved battery disposal box. Once the ELV has been depolluted, it is stripped for parts and stored in one of 6 depolluted ELV stockpiles in the southern area of the site, before being taken off site to be scrapped at a suitable permitted facility. The car parts which are stripped from the car during the dismantling process will be stored in one of the designated shipping containers/buildings in the north of the site, or on impermeable concrete (engines and tyres)

Stockpile Number	Material Type/Stockpiles	Form	Location	Maximum Amount in each area (m^3)
1	ELV	Depolluted	Central west of yard	8 x 2 x 2 = 32 ELVs = 320m^3
2	ELV	Depolluted	South west area of yard	8 x 2 x 2 = 32 ELVs = 320m^3
3	ELV	Depolluted	South of the yard	4 x 1 x 2 = 8 ELVs = 80m^3
4	ELV	Depolluted	South east of the yard	8 x 1 x 2 = 16 ELVs = 160m^3
5	ELV	Depolluted	South east of the yard	6 x 1 x 2 = 12 ELVs = 120m^3
6	ELV	Depolluted	Central east of yard	7 x 2 x 2 = 28 ELVs = 280m^3
7	Tyres	Mixed tyres for resale and disposal	Northern area of yard by the site entrance	30m^3

8	Parts	For resale	Building in north of yard	14.56m^3
9	Parts	For resale	Building in north of yard	20.24m^3
10	Parts	For resale	ISO container in north of yard	38.3m^3
11	Antifreeze	Product of depollution	IBC in north west corner of depollution building	1m^3
12	Oil	Product of depollution	2 x IBCs on western wall of depollution building	2m^3
13	Batteries	Product of depollution	2 x IBCs in north east corner of depollution building	2m^3
14	ELV	In process of depollution	1 ELV on depollution ramp	10m^3
15	Oil Filters and rags	In sealed bin	South east corner of depollution building	0.25m^2

3.4 Due to the nature of the operations, the only wastes stored on site are depolluted ELVs, and the products of depollution – ELVs will be processed as soon as they enter the site. Batteries will be stored in separate 610L approved designated IBC containers with a watertight base, indoors on impermeable concrete. Waste oil and antifreeze is also removed immediately and transferred to one of the designated IBCs. CATs will immediately be transferred and locked in the site van before being removed and recycled at a suitably permitted facility at the end of each day. The non-waste stockpiles are dictated as demands reflect; therefore, the non-waste will be managed in accordance to demand and will be kept on site until the sale is complete, within one of the parts buildings/container or engines and tyres stored on the impermeable concrete. All stockpiles are easily accessible from more than one side to allow for effective firefighting.

3.5 The site only accepts hazardous waste in the form of ELVs with hazardous wastes being removed from the ELVs and stored separately pending recycling elsewhere.

3.6 Wastes are stored in their largest form. There is no cutting or shredding of waste carried out on site

4. MATERIAL STORAGE DURATION

4.1 Undepolluted ELVs will be immediately processed when they enter the site. At any one time, there will be a maximum of one un-depolluted ELV on site, and site management will ensure this by arranging the deliveries of ELVs in such a way that does not cause a build up of undepolluted ELVs.

Processed (de-polluted) ELVs are removed from site once site operatives have extracted valuable parts for resale from the shells; they will have a maximum retention period of 6 months. Engines and tyres for resale are stored on impermeable concrete, other parts are stored in a designated ISO container or building in the north of the site and batteries, oils and antifreeze are stored in IBCs. The retention time of parts will be according to the demands of the market.

4.2 Due to the nature of the operations, the only wastes stored on site are depolluted ELVs, batteries, waste oil, waste antifreeze and waste oil rags & filters. Batteries will be stored in one of two Cemo or similar designated battery boxes, upright with the terminals taped or capped to reduce the likelihood of sparking and ignition. CATs are immediately transferred to a removal vehicle ahead of being transferred to a suitably permitted facility at the end of each working day. Petrol and diesel is immediately transferred to the forklift or staff vehicle once it has been extracted, eliminating the need for a storage facility. Waste oil is also removed immediately and transferred one of two designated $1m^3$ IBCs. These IBCs, as well as the antifreeze IBC are sat within a concrete bund able to hold 110% of the volume of an IBC, and benefit from the sleeping policeman across the entrance to the depollution bay as a second bund. The retention time of waste on site will be a maximum of 6 months depending on the waste type. The non-waste stockpiles are dictated as demand reflects; therefore, the non-waste will be managed in accordance to demand and will be kept on site until the sale is complete.

Material Risk Rating	**Timescale**
Higher risk material (un-depolluted ELVs)	Material will be processed (depolluted) upon immediate arrival on site
Products of depollution (batteries, CATs, waste fluids)	Materials will be processed when the container reaches capacity, or every 3 months
Low risk material (parts for resale)	Material will be processed depending on the demands of the market
Depolluted ELVs	Material will be processed once all valuable parts have been extracted, maximum retention period of 6 months

Due to the only waste material being stored for over 3 months being depolluted ELVs, the risk of self combustion for the site is minimal. All stockpiles will be subject to daily temperature checks using a thermal monitoring gun, the results of which will be recorded and stored in the site office. Any abnormally high readings will be transferred to the quarantine area and continually monitored at 30

minute intervals. If the material fails to cool down, site operatives will douse the material in water, and if any flames or smoke is observed, the FRS will be immediately contacted and site operatives will attempt to extinguish the fire if deemed safe to do so.

5. COMBUSTIBLE STORAGE DIMENSIONS (MAXIMUM)

The various stockpiles of wastes and products on site will be maintained at certain maximum sizes depending upon the need to maintain separation distances and the availability of space. The table below details the maximum stockpile size for each combustible category of waste, with stockpiles according to Drawing ref: 260310MG101

Stockpile Number	Material Type/Stockpiles	Length	Width	Height	Maximum Amount in each area (m^3)
1	Depolluted ELV	4m x 2	1.8m x 8	1.4m x 2	$10m^3$ x 8 x 2 x 2 = $320m^3$ (32 ELVs)
2	Depolluted ELV	4m x 2	1.8m x 8	1.4m x 2	$10m^3$ x 8 x 2 x 2 = $320m^3$ (32 ELVs)
3	Depolluted ELV	4m	1.8m x 4	1.4m x 2	$10m^3$ x 1 x 4 x 2 = $80m^3$ (8 ELVs)
4	Depolluted ELV	4m	1.8m x 8	1.4m x 2	$10m^3$ x 8 x 1 x 2 = $160m^3$ (16 ELVs)
5	Depolluted ELV	4m	1.8m x 6	1.4m x 2	$10m^3$ x 1 x 6 x 2 = $120m^3$ 16 ELVs
6	Depolluted ELV	4m x 2	1.8m x 7	1.4m x 2	$10m^3$ x 2 x 7 x 2 = $280m^3$ $280m^3$
7	Tyres for resale and disposal	5m	6m	1m	$30m^3$
8	Parts for resale	2.83m	5.15m	1m	$14.56m^3$
9	Parts for resale	4.8m	4.21m	1m	$20.24m^3$
10	Parts for resale	6.1m	2.4m	2.61m	$38.3m^3$
11	Antifreeze	1m	1m	1m	$1m^3$
12	Oil	1m	1m x 2	1m	$2m^3$ (x2 IBCs)
13	Batteries	1m	1m x 2	1m	$2m^3$ (x2 IBCs)
14	ELV in process of depollution	4m	1.8m	1.4m	$10m^3$

15	Oil Filters and rags	0.5m	0.5m	1m	0.25m^2

5.2 Stock rotation is extremely unlikely to be a problem with this volume and types of waste, however, the site commits to ensuring that the stock of waste is inspected and if necessary, rotated each month. The aim is to ensure that no parts are retained on site for longer than 6 months, although this time depends on the demands of the market.

5.3 **FIFO** –This site will operate under a FIFO framework. ELVs are immediately processed and undergo depollution in the depollution area. Once the ELV has been depolluted and stripped of all valuable parts, it is taken to be scrapped at a suitably permitted facility. The car parts which are stripped from the car during the dismantling process will be stored in the parts store, or in the external on racking for larger cosmetic parts such as doors and bonnets.

5.4 Due to the nature of operations, the only wastes stored on site are depolluted ELVs, oily rags, batteries, waste batteries, CATs, waste oil, and waste antifreeze. Depolluted ELVs will be stored in the external yard whereas the products of depollution will be stored in IBCs or sealed bins in the depollution building. CATs will be immediately transferred to a site vehicle ahead of removal to a suitably permitted facility at the end of each working day. Petrol and diesel originating from vehicle depollution will be immediately transferred to staff vehicles or the site forklift, eliminating the need for a storage facility. Parts for resale will be stored in the northern portion of the site either in one of two buildings, a 20ft ISO container, or on the impermeable concrete (engines and tyres). The site topography and drainage system dictates that any runoff which comes into contact with tyres or engines will flow down into the sump, thanks to the slope of the site and the boundary treatments, removing the risk of contaminated runoff entering the local environment.

5.5 Stockpile levels will be recorded by the COTC holder weekly. The records will be reviewed by site management and action will be taken in the event where stockpiles are not being reduced as planned. This could involve investing in new equipment, hiring new staff, further staff training or changes in the site's current procedures.

5.6 The site only accepts hazardous waste in the form of ELVs with hazardous wastes being removed from the ELVs and stored separately pending recycling elsewhere. The retention time of waste on site will be a maximum of 6 months (depolluted ELVs), and product material will be processed in line with the demands of the market.

6. CONTROL AND SOURCES OF IGNITION

6.1 A Fire Risk Assessment is carried out annually at site and this identifies potential sources of ignition. As well as the normal sources that every site may have, the site has others that must be controlled. The potential sources of ignition identified are:

6.2 **Naked flames:** There are no naked flames on site.

6.3 **Hot Work:** All hot work generating heat, sparks or flames can cause a fire.

6.3.1 No hot work is required as part of normal site operations. Any hot work which may be required e.g. any work which may give risk to sparks, e.g. drilling, grinding, cutting of metal or stone/concrete, or electrical work will be subject to the Permit to Work system.

6.3.2 Each job under this system is risk assessed prior to work commencing and suitable measures taken to prevent ignition of waste and to deal with any nascent fire promptly before a fire can take hold. This work will be carried out more than 6m away from any combustible waste.

6.3.3 Precautions taken include:

- Cleaning the area of combustible materials prior to work commencing.
- Ensuring that the work is carried out more than 6m away from any combustible waste
- Have suitable fire extinguishers places close to the area of work.
- Maintaining a careful watch throughout the work.
- Inspecting the work area after work has finished and for an hour after.
- A Permit to Work (PTW) system to help manage the risk.

6.4 **Smoking:** The site operates a no smoking policy in operational areas of this site. Management brings the rules on smoking to the attention of all workers and visitors to the site and enforce them.

- Smoking is not allowed on site. There are no designated smoking areas within the permitted site to ensure no smoking occurs in a 6m radius of combustible waste.
- Smokers will be asked to leave the site before they engage in smoking

6.5 **Electrical installations:** should be of sufficient capacity for the intended use and designed, installed, inspected and maintained by competent people.

- A maintenance programme is in place to inspect and service equipment in accordance with manufactures recommendations.
- An annual inspection of site electrics is undertaken by a qualified and registered electrician. If a fault occurs, it will be repaired within 48 hours.

- Attention shall be made to accumulations of dusts/fluff near sources of ignition such as build up on or around electrical equipment, panels etc.

6.6 **Bonfires:** Under no circumstances shall an open fire be allowed on site.

6.7 **Arson:** Measures are in place to prevent unauthorised site access.

- Site security is robust with management patrols at the end of each day, a mixture of sheet steel, concrete panel, mesh and spiked palisade fencing, and a CCTV system covering the entire external yard. The site is inaccessible from the west thanks to a steep railway embankment and dense foliage. To the south, the site benefits from the security measures implemented by the neighbouring site. Furthermore, the steel roller shutter door on the depollution building is heavy duty and locked at the end of each day, and the building is fitted with smoke alarms meaning that site management will be alerted via text message in the event of a fire.

6.8 **Accumulation of materials:** Whilst not strictly a source of ignition, build-up of dusts, fluff and litter can provide ideal material for a fire to start.

- Managed cleaning is in place to ensure that dusts/fluff/litter is not allowed to build up, particularly around electrical equipment and fuse boxes.
- The site shall be inspected daily by the site manager/COTC holder. Any accumulations of dust, debris, fluff etc., shall be brought to the attention of the site management. Any accumulations shall be recorded on the site inspection sheet and cleaned immediately.

6.9 **Self-combustion:** In certain circumstances, certain waste materials can have the ability to generate heat through biodegradation or oxidation, to a point where self-combustion occurs. Although the oily rag waste at site have very occasionally been known to self-combust, certain actions will be taken to reduce this already very low risk.

- To prevent this self-combustion from happening the oily rags are stored inside a sealed bag within a closed container in order to remove oxygen flow which is a key component of combustion
- Waste material stockpiles will be kept contained and within the maximum dimensions outlined above in section 5
- Waste types that are incompatible and have the potential to self-combust, for example, batteries and other wastes shall be stored separately and securely in containers.
- The site will operate a thermal monitoring gun as part of daily site routines. The device will be used to scan each stockpile in order to gain an internal temperature reading. If a

reading above 50°C is observed, the material will immediately be moved to the quarantine area where a site operative will continue to monitor the material. If the material does not drop below 50°C, the material will be doused in water from the on site water tank. This procedure is in place for all stockpiles, particularly those which are stored on site for a relatively long period (3-6 months)

- FIFO and stock rotation procedures are in place to ensure that waste cannot sit for a long enough time for self combustion to occur, although this is unlikely to occur in this type of waste regardless.

6.10 **Industrial Heaters:** There are no industrial/gas heaters on site

6.11 **Batteries:** Batteries are removed from ELVs immediately on receipt, prior to depollution to remove the risk of ignition. Batteries are stored in the Cemo 610L or similar approved battery disposal box within the workshop, for no longer than 3 months or until the container becomes full. They are stored upright with their terminals taped or capped

6.12 **Incompatible Waste:** As the site is a low level ELV site handling only ELV waste, the issue of incompatible and unstable wastes, whilst possible, is very unlikely to arise. However, the site operates a waste acceptance procedure which aims to deal with this, and which is described below.

6.13 **Oily Rags:** As the depollution process will cause the production of oily rags, these will be disposed of in a specific 'oily rag bin', located in the depolluting shed which is sealed to exclude air. They will be disposed of when the bin has reached full capacity, or until the maximum 30-day storage period.

7. WASTE ACCEPTANCE

7.1 The site has procedures designed to ensure that wastes received at site do not present a considerable risk of fire. Checks to ensure the suitability of wastes accepted begin prior to receipt. The site will make enquiries regarding the specific details of the waste including the EWC code, specific details of the vehicle, whether the waste is classed as hazardous (this will always be the case due to the hazardous components within the vehicle), details of the source of the waste, including the waste producer and any subsequent waste carriers.

7.2 ELVs are inspected by site staff at the point of collection prior to being accepted. Wastes are also supervised so that any issues which were hidden and not identified prior to receipt can be seen. The aim of this is to ensure that a problematic load is not accepted.

7.3 The site only accepts hazardous waste in the form of ELVs, so the potential of a fire arising from mixtures of wastes or incompatible wastes is very limited. However, it is also recognised that some scrap metal wastes can include chemicals, as surface treatments etc, and although these are likely to be in very small quantities, it is theoretically possible that a residual risk from incompatible wastes remains. If such a load is identified at collection it shall be rejected and site management advised.

7.4 Site operatives will be trained to inspect areas of ELVs including storage compartments, wheel arches, exhaust pipes and engine bays ahead of waste acceptance so that if any non conforming materials are found they can be sent off site with the waste producer. However, on the unlikely occasion that non conforming materials are discovered following waste acceptance, they will be segregated in the quarantine area before removal from site within a maximum timeframe of 48 hours.

8. QUARANTINE AREA

8.1 The quarantine area for this site is located in the centre of the site, with a 6m buffer zone between the quarantine area and any combustible material. The area of the quarantine area is 160m^2 which is compliant with Environment Agency guidelines in that it can accommodate half of the largest stockpile on site (320m^2).

8.2 The quarantine area is positioned in order to provide ease of access from all areas of the site, including the site entrance. As mentioned there are no waste/material stockpiles in this area and the area is also free of obstruction from any buildings or the site boundary

8.3 The quarantine area will be utilised in the discovery of any non conforming waste on site. It will also be used if a waste stockpile measures over 50^{o}C during daily fire watches. The waste stockpile in question will either be transferred to the quarantine area where it will be monitored, or if the stockpile is showing signs of combustion (smoke or flames), the waste within 6m of the hot load will be positioned in the quarantine area in order to make a 6m firebreak around the burning load. This is to prevent the spreading of fire to other waste stockpiles while also preserving the health and wellbeing of the site operatives.

8.4 Waste in the quarantine area may be doused with water from the mains if necessary. If a stockpile in the quarantine area or otherwise shows signs of combustion (smoke or flames) the FRS will be immediately contacted.

9. FIRE DETECTION AND PREVENTION MEASURES

FIRE PREVENTION AND DETECTION MEASURES

9.1 Several measures are taken to prevent a fire, these include:

- Fire risk assessment in place.
- Fire exit and fire safety warning signs displayed.
- Fire awareness raised as part of employee induction training.
- Fire extinguishers are located throughout the site maintained by external service contractor.
- Daily check to ensure correct operation of fire-fighting equipment by employees.
- Material inspection procedure.
- Dedicated hot work procedure.
- All naked flames or other sources of ignition to be kept at least 6m away from combustible wastes.
- Batteries to be removed from ELVs on receipt prior to de-pollution.
- Contractor control programme which includes a site induction.
- Smokers asked to leave the site before engaging in smoking
- The only plant on site is one forklift which will be stored 6m away from any combustible materials, and one fixed car lift for depolluting. All plant will be fitted with fire extinguishers
- ELVs are to be inspected for signs of combustible liquid leakage upon receipt. In the event of any leaks being identified, all liquids shall be immediately drained from ELVs and stored in the appropriate container. Any spillages shall be dealt with in accordance with procedures and staff are trained in the use of the spill kits which are stored inside the workshop by the IBC for waste oil.
- The concrete bund around stockpile 14 (waste contaminant) liquid will ensure no contaminant fluids leak onto the external yard
- Ensuring all electrical equipment is routinely tested and certified by a qualified electrician.
- The site is secured by 2m high fencing including a 2m high spiked security gate
- Ensuring all plant equipment is kept in good condition and undergoes routine maintenance.

- There are two thermal detection cameras on site which will alert site management via text message in the event of a fire. One of these is located in the depollution bay as this is the area with the greatest fire risk, and the other is pointed at the depolluted ELV stockpile as this is the largest combustible waste stockpile.

9.2 Fire Watch

9.2.1. Throughout the day the site manager will conduct dynamic fire inspections on an ongoing basis. These involve a visual inspection of waste stockpiles, electrical equipment and mobile plant.

9.2.2 At the end of each working day a documented Fire Watch will be undertaken in accordance with the Fire Watch Procedure. This shall include thermal monitoring of stockpiles, plant and equipment. The nominated member of staff shall inspect the site using a hand-held IR non-contact thermometer / infra – red thermal imaging device.

9.2.3 The device shall be used to "scan" over a stockpile to seek for "hotspots" on the surface. Hotspots are considered to be any area significantly higher in temperature than neighbouring areas and any area over 50 degrees Celsius. Temperatures will be recorded on the Fire Watch form. Records shall be kept in the site office.

9.2.4 If any "hotspots" are identified, then measures described in the Fire watch procedure shall be undertaken to manage the stockpile.

9.2.5 After hot work is carried out, an operative will keep the area under observation for an hour to ensure that a fire doesn't occur.

9.2.6 At management meetings, recorded temperatures will be reviewed, and any concerns identified will be addressed at this point. The changes could involve changes in procedures, resetting trigger temperatures purchasing of new equipment or re-training staff as deemed necessary.

9.2.7 Where monitoring shows temperatures above 50^{o}C level a fire watch shall be set up and temperatures monitored at 30-minute intervals until such time as temperatures fall below this trigger level in accordance with the Hot/fire watch procedure. If possible the waste will be moved to the external yard to limit the chance of other wastes becoming hot.

9.2.8 Site operatives will make note of any waste which has been on site for longer than 3 months, and ensure that temperature monitoring procedures occur at least twice a day for these stockpiles to mitigate the risk of self combustion

9.3 Inspections and Monitoring

9.3.1 In addition to the Hot / Fire Watch, dynamic inspections will be carried out by the site staff throughout the working day with further daily inspections carried out by the site manager to ensure that stockpile sizes and rotation remain within the limits.

9.3.2 These inspections will all involve perimeter and security inspections to reduce the likelihood of an arson attack, together with a review of Fire Watch records and temperature monitoring.

9.3.3 Daily inspections will also involve a site operative checking each extinguisher and automatic fire suppression device to ensure that it lies within the green pressure band on the pressure gauge. If the extinguisher is not in the correct pressure band or has visual damage, a replacement will be sourced immediately within a maximum timeframe of 48 bours. If an extinguisher fitted to plant is not in the green pressure band, the plant will be taken out of operation until a replacement can be found.

9.3.3 The combustible waste stored in the depollution and stripping area will not be exposed to the sun, along with contaminant waste fluids stored in designated IBCs and batteries/CATs stored in Cemo or similarly approved 610L battery boxes. Therefore, there is minimal risk of solar heating in these stockpiles. Depolluted ELVs will occasionally be exposed to direct sunlight, however site operatives will mitigate this risk by adhering to the daily thermal monitoring procedures and segregating any waste which gives an abnormally high reading in the quarantine area. Site operatives may douse any hot waste with water from the water tank, and contact the FRS if necessary

9.4 Site Design

9.4.1 The permitted site covers an area of 4000m^2 and is designed for ease of access between the depollution area, site access, waste stockpiles and parts storage. The site is under the sole control of Milton Gough. The site surface consists of impermeable concrete with some compacted hardstanding to the south of the site. The depollution shed is constructed of impermeable brick, and sits in the north west corner of the site. The area is surfaced with impermeable concrete and has a sleeping policeman across the entrance which acts as a bund to prevent any spilled waste contaminant liquids impacting the local environment. The products of depollution will be stored in the appropriate designated containers – Waste oil will have 2 1000L IBCs, antifreeze will have 1 1000L IBC, and lead acid batteries will have 2 Cemo or similar 610L battery boxes. Batteries will be stored upright with their terminals taped or capped in order to prevent sparking or ignition. Each IBC will be subject to daily checks to

ensure that there are no leakages. In the event of a potential leakage the liquid will be held on the impermeable concrete within the concrete bund. The depollution area is bunded again by a sleeping policeman across the entrance. There will be no surface runoff contaminated by lead acid batteries, oils or antifreeze because they are stored under cover. The site will be provided with fire water by a hydrant located approximately 30m from the site entrance. All depolluting operations occur within the depollution bay. All surface runoff drains to a sump at the lowest point of the site located on the northern boundary. The tank has a capacity of approximately 3000L and will be emptied as and when necessary by a suitably permitted carrier

9.4.2 Regarding site operations, there will be only one ELV in the depollution area at any one time. ELVs will be depolluted immediately on arrival to site. Batteries will be removed from the ELVs immediately upon receipt prior to the depollution process and are stored upright with their terminals taped or capped, undercover on impermeable concrete in an appropriate container. CATs are immediately transferred to the site van before being taken to a suitably permitted recycling facility at the end of each working day. A maximum of one ELV will be depolluted in this area at any one time. Oils and antifreeze are stored in 1 of 3 IBCs (2 for oil, 1 for antifreeze) again on impermeable concrete under cover. It is important to note that the depollution ramp, battery storge and waste contaminant storage building is bunded by a sleeping policeman at the base of the roller shutter door so that no contaminated runoff can impact the local environment, along with the concrete bund around the 3 IBCs. Once the ELV has been depolluted, it is stripped for valuable resale parts before being stored in one of 6 stockpiles in the southern area of the site. Further parts may be removed from the vehicle depending on the demands of the market, before it is scrapped at a suitably permitted facility within a maximum timeframe of 6 months. The car parts which are stripped from the car during the dismantling process will be stored in the northern area of the yard, in one of two buildings, a 20ft ISO container or on concrete (engines and tyres). Any runoff which comes into contact with engines or tyres will run over the concrete straight into the 3000L drainage tank, minimising the risk to the environment. All engines will be wiped down of oil ahead of storage using a rag. Wastes in the depollution area are all under cover which will mitigate the possibility of internal heating. All wastes will be subject to daily thermal monitoring procedures and if necessary can be doused in water if site operatives deem there to be a risk of self combustion. The maximum retention time for waste on site will be 6 months for depolluted ELVs. The product material will be processed in accordance with the demands of the market.

9.4.3 There is an office area in the building located in the north east corner of the site next to the entrance, in which will lie flood defence equipment (hydrosnakes) and PPE

9.4.4 The external yard area is also entirely contained by a range of different boundaries which help keep the site secure to mitigate against the risk of arson and also protect the nearby land from any environmental harm

9.5 Drainage

9.5.1 Site drainage consists of a 3000L sump situated beneath the lowest point of the yard on the northern boundary. Any precipitation or other liquids will run off the surface of the site into the sump thanks to the impermeable surface and boundary which will not let any runoff enter the surrounding areas.

9.5.2 All components of ELVs carrying or containing waste contaminant liquids will be removed and thoroughly wiped down and checked for any residual liquids ahead of storage to ensure that contaminated runoff doesn't occur. Engines, for example will be removed, wiped down and stored on impermeable concrete in the north of the site. The thorough nature of depollution on site will mean that depolluted ELVs can be effectively stored without compromising the condition and wellbeing of the surrounding environment. Waste contaminant liquids are bunded by a concrete block wall which can hold more than 110% of an IBC, and all wastes and materials in the depollution area will be bunded by a sleeping policeman across the entrance and spill kits to retain any spillages and remove the risk of environmental damage.

9.6 Incoming Waste

9.6.1 Incoming waste is accepted only by prior arrangement, so the site will have full control over incoming waste and can ensure that no waste is delivered to site during an incident.

9.6.2 No waste is delivered to site during an incident and the entrance of the site will be manned by site operatives to stop all visitors at the access road. Site management will contact any incoming waste and tell the carrier to divert the waste to another permitted facility which will be possible as all deliveries to site have been pre arranged. The only external people permitted on site during an emergency will be the FRS and the EA.

9.6.3 Thorough waste acceptance procedures are in place (section 7) to ensure that no adverse impacts arise through non conforming waste. Procedures include thorough searches of each incoming vehicle and protocols which will be followed if non conforming material is discovered

9.7 Security

9.7.1 Throughout the working day the site is monitored by site operatives. In the event of signs of a fire being present, the site operatives will first inform the FRS and then notify site management. Site

staff are not formally trained in firefighting and will not attempt to extinguish a fire unless it is a very minor nature and can safely be tackled with a fire extinguisher.

9.7.2 CCTV on site consists of three remotely accessible cameras, two covering the entrance to the site and northern area of the yard situated on the office building. There is a further camera covering the southern area of the yard situated on the western boundary. These will alert site management of a break in on site, who can then go ahead and contact the appropriate emergency services.

9.7.3 Security in the depollution area consists of a smoke alarm which will alert site management if triggered to mitigate the impacts of a potential fire. The building is also secured by a heavy duty steel roller shutter which will be locked at the end of each working day

9.7.4 the site perimeter is secured by a number of different fencing types: 3m and 4m high concrete panel fencing (south and west), 2m and 3m high steel sheet fencing (north) and 2m high mesh (east) and palisade (east and north) fencing. The site access will be locked at the end of each day and secured by palisade gates topped with security spikes. It is crucial to note that to the west of the site the perimeter is inaccessible due to a steep railway embankment and dense foliage. Furthermore, the south western boundary of the site benefits from security measures implemented by the immediate neighbouring site.

9.8 Housekeeping

9.8.1 The site shall be inspected daily by the COTC holder who is also the site manager. Any accumulations of dust, debris, fluff etc, shall be brought to the attention of site management. Any accumulations shall be recorded on the site inspection sheet and cleaned immediately.

9.8.2 Attention shall be made to accumulations near sources of ignition such as dust/fluff build up on or around electrical equipment, panels etc.

9.8.3 The site operates a thermal monitoring gun which will be used daily to scan over all stockpiles. If an internal temperature of 50^{o}C or greater is recorded, the waste in question will be placed in the quarantine area. A site operative will continue to monitor the waste, if the temperature does not fall below zero, water from the onsite water tank will be used to reduce the temperature of the stockpile.

9.8.4 The risk of fire is managed by very careful attention to housekeeping, keeping areas clean, free from litter and detritus, especially electrical infrastructure, through inspections and monitoring, including temperature monitoring throughout the day and in particular as part of the end of day fire watch.

9.9 Storage of Combustible Materials

9.9.1 The only combustible materials held on site are:

- Batteries (Stockpile 13 - two Cemo or similar 610L battery boxes. Stored upright in order to prevent sparking and ignition, stored undercover on impermeable bunded concrete to prevent contaminated runoff)
- Waste contaminant liquids (Stockpile 11 and 12 - stored in double bunded IBCs – 2 x oil and 1 x antifreeze – to prevent contaminated runoff)
- Maximum of 126 ELVs in depolluted ELV storage area (stored in 6 separate stockpiles (1-6) with 6m firebreak between each stockpile. Operators will ensure that contaminant liquids have been fully removed during the depollution process ahead of storage by removing liquids at the beginning of the depollution process and allowing them to drip out for the duration of depollution, with a minimum drip time of 1 hour, and wiping down any parts containing oil with a rag)
- Maximum of 1 undepolluted ELV (Stockpile 14 - Undepolluted ELVs will be immediately subjected to the depollution process which will take place on an impermeable concrete surface bunded by impermeable brick walls and a sleeping policeman)
- Waste oil rags and filters (Stockpile 15 - stored in a bag within a sealed bin to eliminate oxygen flow which is a key component of combustion)
- Tyres (Stockpile 7 - stored on impermeable concrete in the north of the site. easy access to the quarantine area and the entrance for the FRS if a fire related issue were to occur. Subject to monitoring and stock rotation – FIFO – to reduce the likelihood of self combustion)
- Engines & parts. (stockpile 8, 9 and 10) Parts and engines are stored in one of two buildings, a 20ft ISO container, or in a small area of the external yard. These areas are shaded and will be subject to daily stockpile temperature monitoring. Engines will be stored outdoors on impermeable concrete. It is important to note that all parts and engines will be wiped down of oil ahead of storage, and any runoff which comes into contact with tyres or engine will drain straight into the drainage sump thanks to the topography of the site and impermeable surface and boundary of the site.

9.9.2 No gas cylinders are stored on site. Batteries are stored within a Cemo 610L or similar approved battery disposal box.

9.9.3 The largest form of combustible waste consists of the depolluted ELVs in their storage area. Stockpiles 1 and 2 are the largest individual stockpiles, each containing 32 ELVs (320m^2)

9.9.4 All storage areas are easily accessible from at least two sides to ensure that if a fire occurs inside of them, it can be put out.

9.9.5 There are no other combustible materials held on site other than those stated above.

9.10 Fire Exercises

9.10.1 Routine fire exercises will take place every year. This will take the form of a practice run through of the procedures to be followed on discovering a fire, from raising the alarm to notifying the authorities to evacuating the site and notifying residents.

9.10.2 A fire procedure has been produced and forms part of the site's management plan. Each exercise shall be recorded and any deficiencies in the exercise shall be noted, reviewed by site management and any appropriate corrective action taken. Corrective action may include re-training of staff, amendments to procedures, or purchase of alternative equipment as deemed necessary.

Waste Segregation

In order to reduce the risk of fire spreading, the forklift truck can be used in order to segregate waste and create fire breaks between a potentially burning load, and other combustible materials

- This may entail moving a hot load into the quarantine area, or moving other loads away from the burning load to create a firebreak and prevent fire from spreading
- Site operatives will only do this if it is considered safe to do so. If flames are visible, staff will be instructed not to bring the forklift truck within 6m of the stockpile in question – this strategy will be deployed when site operatives deem a stockpile to be at risk of combustion
- The forklift can be used to transport IBCs, battery boxes and ELVs
- Site operatives will ensure that the external yard will be clear in accordance with drawing 260310MG101 so that if material is being transported through the yard using a forklift, there is a clear route to the quarantine area
- This procedure is in accordance with SWP022 – Moving Containers (appendix 9)

9.11 Plant and Vehicles

9.11.1 The only large plant stored on site is a forklift and a car lift used during the depolluting process. The forklift will be stored next to the site office when not in use, more than 6m away from any combustible waste. Road going vehicles aside from the sites own van will not be permitted past the site entrance. This reduces the risk of fire by keeping hot exhausts away from any waste when the site is unmanned. There is no fuel store for mobile plant as any diesel recovered from an ELV on

site goes straight into the forklift. Any petrol which is recovered goes straight into staff vehicles eliminating the need for a storage facility.

9.11.2 Plant and vehicles will be fitted with fire extinguishers intended for use by site operatives in the event of plant combustion. The pressures on the extinguishers will be inspected daily as part of plant and vehicle maintenance procedures. If the pressures on these extinguishers is not within the green threshold, the plant will be taken out of operation until a repair can be affected.

9.11.3 Spillages will be cleaned using absorbent granule spill kits. The location of these can be seen on drawing ref: 260310MG101

9.12 Plant & Vehicle Maintenance

9.12.1 Maintenance is required on the site forklift; this includes a mix of daily checks by site staff and routine planned maintenance by specialist sub-contractors. A service schedule is maintained to ensure all servicing and statutory testing is undertaken at the specified intervals.

9.12.2 If a defect is discovered during the routine daily inspection, this shall be rectified as soon as possible. Generally, this will mean within 48 hours. If the defect is on a part which could give rise to a source of ignition or on a fire suppression system, the equipment will be immediately taken out of service and stored in the Quarantine area until a repair can be affected.

9.12.3 Part of daily maintenance is also a detailed clean to prevent the build-up of dusts, waste etc. in parts that may not be readily visible. Particular attention will be paid to the exhaust system and engine on mobile plant. This is subject to a Site Working Procedure.

9.12.4 Any equipment showing evidence of a leak will be repaired immediately. Any spillages will be cleared using Spill-Dri or similar and the residues disposed of to a suitably authorised facility.

9.12.5 If there is a problem discovered site management will seek to resolve it immediately by replacing or hiring new equipment. Equipment will be serviced and repaired in accordance with the manufacturer’s requirements.

9.12.6 Where any new plant is procured, any metallic surfaces which may come in to contact with the concrete floor will have an anti-spark coating applied.

9.12.7 Daily plant and vehicle inspections will include checking the pressure and condition of the fire extinguishers which are installed on the plant. If an extinguisher fails to meet the requirements, the plant will be taken out of use until an acceptable extinguisher is fitted. This will be carried out within 48 hours.

9.12.8 Daily inspections will be carried out by site management or site operatives, however maintenance and repairs will be carried out by certified contractors.

9.13 Training

9.13.1 All staff receive training at the commencement of their employment. Induction training is used to provide a basic level of training necessary to begin work and to identify training needs not identified during the recruitment process.

9.13.2 The induction process incorporates an introduction to the Site Management Plan, Site Working Procedures Manual, Planning Permission and Environmental Permit.

9.13.3 The requirements of the FPP and EMS shall be communicated to all staff and copies made shall be available on site. Staff will be trained using toolbox talks, reinforced annually or when the FPP is amended.

9.13.4 A training register is maintained to record qualifications and training to identify any skills shortages or training requirements within the Company. Any additional training needs will be implemented following discussions with staff.

9.13.4 At the end of each training module, a short knowledge quiz will be issued to ensure that the training has been understood and will be implemented into daily site operations

9.14 Electrical Safety

9.14.1 The site has a current electrical test certificate and electrical infrastructure is included in the service schedule to ensure that this is maintained. All plug-in equipment is tested annually, and electrical infrastructure is tested every 3 years.

9.14.2 All testing and maintenance of electrical equipment and infrastructure is carried out by a suitably qualified and accredited electrician.

10. INCIDENT MANAGEMENT

10.1 In the event of a fire being reported by a person, site management will immediately investigate. Once a fire is confirmed, several actions will take place (concurrently not sequentially).

- Site Management will immediately order all site operations to be ceased and notify the Fire and Rescue Service (FRS) of the incident
- If safe to do so, a site operative will use the forklift to transport any waste containers within 6m of the fire into the quarantine area, which is located with easy access from both internal

and external waste stockpiles. The forklift will be able to achieve this for battery boxes, IBCs and ELVs. If a stockpile is showing small signs of combustion such as high temperatures or minor levels of smoke, operatives will move that stockpile to the quarantine area. However if flames or large levels of smoke are present, stockpiles within 6m of the burning stockpile will be moved in order to preserve staff safety and wellbeing

- A member of staff will be detailed to guide the FRS on arrival and to provide the senior officer with a copy of the up-to-date Fire Prevention Plan.
- If deemed safe and practical to do so, before the arrival of the FRS, designated staff will attempt to extinguish the fire using the sites fire extinguishers.
- Site management will order the evacuation of the site in accordance with the fire drill for all events of fire and will assist in the safe evacuation of all staff, contractors, and visitors.
- A fire however small will be considered an emergency. In addition to this, the Site Manager will immediately cancel all inputs to the site and all vehicles present on site at the time will be sent off site as a precaution until management are assured that the fire is out, and risk of re-ignition has passed.
- Site management will inform the Environment Agency of the incident.
- The gates would remain open and would be manned to allow for the FRS. No other parties other than the FRS and Environment Agency would be allowed access. Throughout the duration of the fire and the cleaning process afterwards, no wastes will be accepted on site.

10.2 Following a fire, once the Fire and Rescue Service deem the site to be safe, an inspection of the site shall be made, and a decontamination plan produced.

10.3 Residual waste will be sent for recycling at a suitably permitted facility or disposal to landfill as appropriate. Once the site is cleared of the products of combustion, an inspection of the site infrastructure shall take place to determine the extent of damage to site surfacing etc.

10.4 A plan of action shall then be created to repair or replace any elements of site infrastructure damage by fire and such remedial works as are required shall be carried out before the site is re-opened and any wastes are accepted.

11. FIRE SUPPRESSION

Fire prevention is a key part of staff duties, but they are all also trained in fire suppression and in the event of a fire, will attempt to extinguish a fire if it is considered safe and practicable to do so.

11.1 Fire Extinguishers

11.1.1 There are 4 foam fire extinguishers on site. There are 2 located in the site office for easy access to the quarantine area and external yard stockpiles, as well as another 2 located in the depollution shed for wastes and materials stored within the building.

11.1.2 The fire extinguishers on site are at a size of 6 litre, 10kg and are maintained in accordance with the manufacturer's recommendations.

11.1.3 Each stockpile can be easily accessed from more than one side to be extinguished using foam fire extinguishers or using water via the FRS and nearby fire hydrant.

11.1.4 Daily inspections will involve a site operative checking each extinguisher to ensure that it lies within the green pressure band on the pressure gauge. If the extinguisher is not in the correct pressure band or has visual damage, a replacement will be sourced immediately. If an extinguisher fitted to plant is not in the green pressure band, the plant will be taken out of operation until a replacement extinguisher can be found.

11.1.5 All extinguishers, including those fitted to mobile plant, and fire suppression devices will be subject to an annual maintenance program provided

11.2 Automatic Fire Suppression

11.2.1 The depollution bay will be covered by an automatic fire suppression system, which will be activated in the early stages of a fire. Automatic suppression systems are particularly beneficial out of operational hours

11.2.2 The system will be installed and maintained by a UKAS accredited technician to ensure its continuous functionality

11.2.3 The device works using a bulb which breaks when the temperature exceeds 65^{o}C, which then triggers the fire suppression system – a spraying of dry powder onto the material below.

11.2.4 These Automatic Fire Suppression devices will be subject to the same daily check and maintenance procedures which the fire extinguishers are, as outlined in section 11.1.4 and 11.1.5

12. FIRE AND RESCUE SERVICE

12.1 The nearest fire station to the site is Cudworth Fire Station, which is approximately 1.58km south of the site. Google maps indicates a travel time of 5 minutes, however this is expected to be lower for the fire rescue service

12.2 A second station, Barnsley fire station, is approximately 6.22km south west of the site. Google maps indicates a travel time of 20 minutes however this is expected to be considerably shorter for the fire rescue service

12.3 Tankersley and Wakefield fire station are both 11.17km to the south west and north west of the site respectively. The travel time from Wakefield is 23 minutes and the travel time from Tankersley is slightly longer at 27 minutes. However these are both expected to be considerably lower for the FRS.

12.4 the site will gain its firewater from a hydrant which lies approximately 30m north east of the site entrance on the same industrial complex which the site lies on. The FRS will not have to stop traffic on Shaw Lane in order to access the hydrant

13. WATER SUPPLY

13.1 The site will use a private water tank to supply water in the event of a fire

13.2 The largest combustible stockpiles on site are stockpiles 1 and 2. Each of these stockpiles contain 32 ELVs which equates to 320m^2. Crucially, these stockpiles are separated by a 6m fire break so can be considered their own separate stockpiles for fire water considerations. ELV water calculations can be used, assuming that the average ELV requires 1,800L of water, a total of 57,600L (1800L x 32) of water would be needed to extinguish a fire in the largest stockpile. As the fire would need to be extinguished within 4 hours, a flow rate of 240L/min($\frac{57{,}600L}{240}$) would be required.

13.3 This flow rate will be easily achievable by the hydrant, and due to the proximity of 4 nearby FRS stations, the need for a water storage facility on site is superfluous

14. FIRE WATER CONTAINMENT

14.1 The site has an existing impermeable surface which is where all combustible stockpiles are to be stored. We have therefore assessed the potential effect of water on:

- The local groundwater and surface water bodies.

- Any well, spring or borehole within 50 metres used for the supply of water for human consumption, including private water supplies.

14.2 Fire water will be contained by the surface of the site, site perimeter fencing, the topography and the private drainage system with sealed sump. Parts stored for resale in the external yard, buildings and shipping containers are not considered waste. The wastes which aren't on concrete will be stored on compacted hardstanding made up of fragmented pieces of concrete, brick and stone. This compacted surface is generally considered to be impermeable and will offer the surrounding environment a considerable degree of protection against potentially contaminated throughflow. The topography of the site dictates that any water should naturally drain off the hardstanding and concrete into the drainage sump and the surrounding surface in the north of the site where the surface is impermeable concrete.

14.3 The largest combustible stockpiles on site are stockpiles 1 and 2, which each have 32 vehicles and are separated by a 6m fire break

14.4 As the stockpiles comprise of just ELVs, the calculation consists of the standard guidance for waste, and ELV specific guidance. The total water supply needed per vehicle is 1,800L, meaning the total water supply required for the ELVs is 57,600L (1,800 x 32) based on standardised ELV fire water requirements

14.5 <u>Fire Water Containment Calculations:</u>

Fire water on site will be contained by fencing, topography, an impermeable surface, a sealed drainage system and hydrosnakes across the site entrance

Permitted Area

Volume of firewater = 57.6m^3

Area = 4000m^2

Height of containment required = 0.0144m ($\frac{57.6}{4000}$). This is equivalent to 1.44cm.

This height of fire water can easily be contained by the gravel board surrounding the site, and hydrosnakes across the entrance.

14.5 Foam will also likely be used to tackle fires on site. The foam extinguishes a fire by rapidly cutting the oxygen supply by expanding over the surface of the stockpile. This has an average expansion rate of 5:1 to 7:1. Foam is considered the most suitable to operate during the early stages of a fire prior to the arrival of the FRS. The foam works in the following ways:

- "The foam blankets the fuel surface smothering the fire".
- "The foam blanket separates the flames/ignition source from the fuel surface".
- "The foam cools the fuel and any adjacent metal surfaces".
- "The foam blanket suppresses the release of flammable vapours that can mix with air". (Chemguard, 2005).

14.6 Based on the worst case scenario (e.g 5:1 water to foam solution ratio) 11,520L (57,600L / 5) of water is all that is required to extinguish a fire in the largest flammable stockpile on site.

14.7 Using foam greatly reduces the runoff and potential for pollution which is also a concern for the Fire Service.

14.8 If a fire were to occur in the largest stockpile, the use of foam would mean that the volume of foam to be retained on site would be $57.6m^3/5 = 11.52m^3$. Over an area of $4000m^2$ this equates to a foam depth of 0.0028m (0.28cm) ($11.52m^3/4000m^2$), easily retained by the Hydrosnake system. It is likely that the FRS will use foam as best practice when tackling a fire. The site is capable of retaining a foam depth of 0.05m (5cm) using hydrosnakes across the entrance and various fencing types. The firewater will then be removed from the site by a tanker and disposed of to a suitable permitted facility.

14.9 Hydrosnake barrier

A barrier of up to 1.44cm high, as calculated in section 14.5, is needed to contain water around the site entrance. The total width of this area is approximately 7.5m. A single Hydrosnake has a length of 1.45m and has a flood water depth of 0.05m. (5cm) Therefore, a total of 6 hydrosnakes are required (7.5m/1.45m = 5.17). Hydrosnakes are a temporary flood barrier which form a seal to hold in water. The barrier has the advantage of allowing the FRS to still gain access to the site without the contained water being released. The Hydrosnakes take 2-3 minutes to deploy. The site manager will be responsible for ensuring that they have been appropriately deployed during any fire event. Hydrosnakes have a shelf life of 5+ years and will be immediately replaced after they have been used. Please refer to drawing Ref: for the storage and deployment locations of the barriers.

15. SENSITIVE RECEPTORS

15.1 Current guidance from the Environment Agency on Fire Prevention Plans, states that schools, nursing homes, residential area, workplaces etc are all sensitive receptors. In a fire event, sensitive receptors will be contacted by either knocking on doors or by a phone call. They will be advised to close all doors and windows until the fire has been extinguished. This will be achieved by site

management calling where possible and by staff being deployed to knock on doors of neighbouring properties.

The closest sensitive receptors of each main type are:

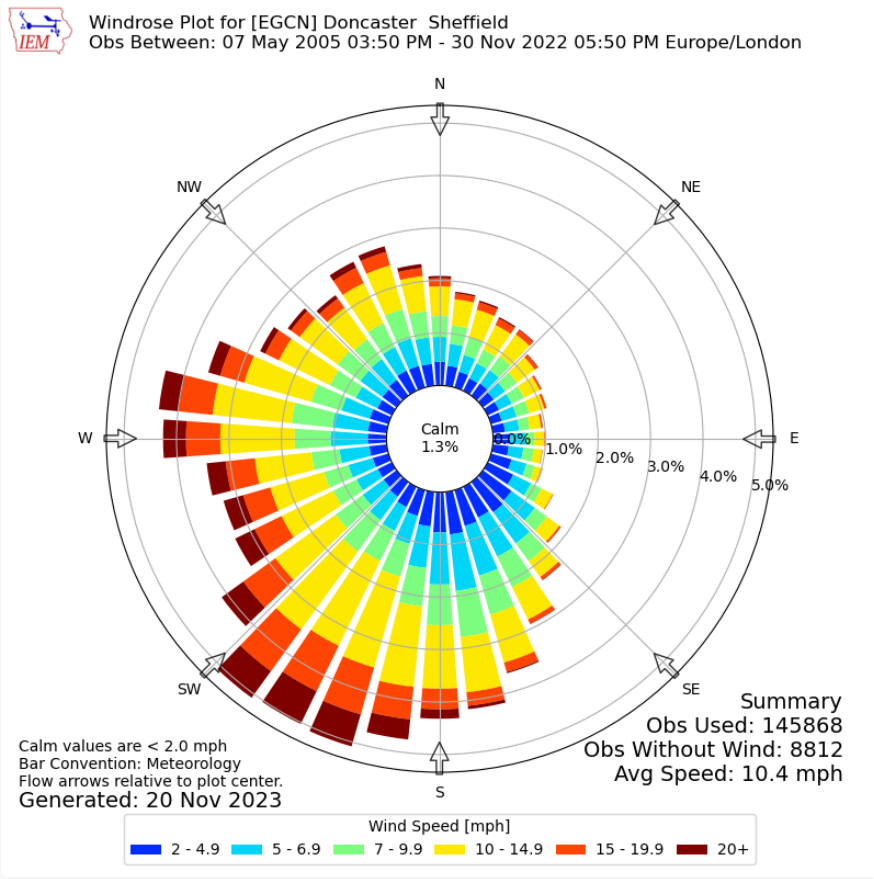
Receptor Type	Name	Adress	Distance from Site
School	Outwood Academy Carlton	Royston Ln, Barnsley S71 3EW	820m North West
Residential	107 Shaw Ln, Cudworth, Barnsley, S71 3HH		207m West
Environmental	Dearne Valley Wetlands SSSI	Shaw Ln, Cudworth, S71 3HJ	0m West

It is crucial to note that the site has implemented measures in order to mitigate any potential adverse impacts on the neighbouring SSSI. These measures include a 4m high concrete panel wall between the site and the SSSI to ensure that a potential fire in any stockpile will not protrude over into the woodland.

16. PRODUCTS OF COMBUSTION

16.1 Smoke Plume/ Dispersion

16.1.1 A wind rose from the Sheffield Doncaster Weather Station has been obtained and assessed as being the nearest to the site. The results can be seen below.



16.1.2 The prevailing wind originates from the south west and west, meaning any smoke resulting from a fire at the site will likely travel in an easterly/north easterly direction. However this could depend on the conditions at the time of the fire.

16.1.3 As a result of the prevailing wind directions, receptors which are likely to be impacted is Carlton Marsh and the fields beyond, as well as residential properties on Shaw Ln and Royston Rd and industrial/commercial properties on Shaw Ln

16.2 Storage and Disposal of Residues

16.2.1 Following any fire, an assessment of the products requiring disposal shall be made by site management and a plan produced for the most appropriate means of disposal. Following approval by the fire services, Environment Agency and site manager, the residues from the fire will be disposed of accordingly at a suitably permitted facility.

16.3 Staff Training & Awareness

16.3.1 The key to any plan is to ensure that all staff are aware of their duties and act accordingly. This plan and the duties required of staff in accordance with related procedures is communicated to staff through induction training and toolbox talks.

16.3.2 The Fire Prevention Plan is distributed freely, in full, to all staff. All copies of the FPP, both individual staff members' copies and the Master Copy are kept in the site office. Staff are trained in the requirements of the FPP at induction and at annual toolbox talks. Quarterly exercises are held to test the response to an incidence of fire. All such exercises shall be recorded in the site diary.

16.3.3 Training will also be distributed when any changes to plant, site layout or operational procedure occur. At the end of each training module, each training recipient will be required to take a short knowledge quiz to ensure that the training which has been distributed will be implemented into the daily operations of the site

17. FIRE PROCEDURE

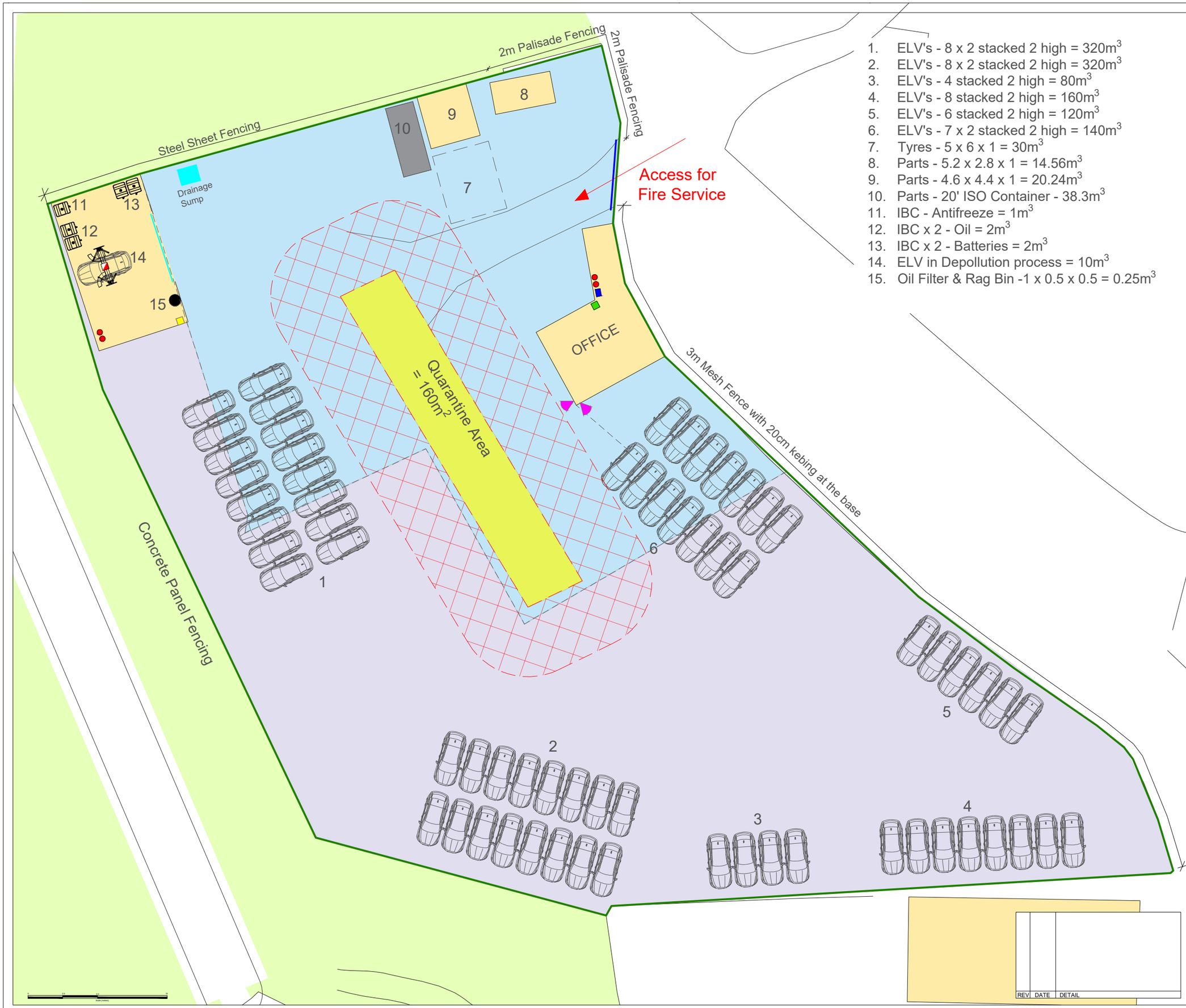
17.1 In the event of a fire the following procedures are:

- Site management will immediately be informed, and all operations will cease. All expected vehicles will be notified and unable to enter the site.
- Site staff will be trained in the use of fire extinguishers. They will attempt to tackle minor fires in the early stages to extinguish or prevent a fire from spreading. The FRS and emergency services will be contacted by site management during this time if the site cannot be dealt with using onsite resources.
- If the fire becomes uncontrollable for site staff, the site shall be completely evacuated until the emergency services arrive.
- Neighbours and other receptors including schools, care homes and medical facilities within a 1km range will be notified of the fire
- Once fires have been tackled the site will inform the Environment Agency of the fire and make amendments and actions to prevent this from happening again in the future.

17.2 After fires have been extinguished, procedures are taken to decontaminate and get the site to an operational use again. Procedures taken are dependent on the severity of the fire. These may include:

- Informing the Environment Agency of the incident and review of the site management and fire prevention plans.
- Analyse the retained fire water to see if this is contaminated. Once analysed and deemed to be acceptable it will be pumped out and released into the sewer. If the water is contaminated, then it may be removed from site by a tanker and disposed of to a suitable permitted facility.
- PPE will also be removed and disposed of at a suitably permitted facility.
- Certain wastes may need to be disposed of as they may no longer be allowed to be treated and recycled.
- If the fire is severe and large, then the concrete may become damaged. In this event the site may need to be resurfaced prior to re-opening. Any other repairs to removals that are required e.g. buildings will be carried out to manufacturers recommendations.
- Once the contaminated water has been removed, the concrete has been deemed acceptable, other repairs have been made and the quarantines and contaminated waste have been removed, the site will be inspected by the COTC holder. If after the inspection the site is of an acceptable nature, then it can reopen and continue with its usual operations.

APPENDIX 1 – FIRE PREVENTION PLAN LAYOUT: 260310MG101



1. ELV's - 8 x 2 stacked 2 high = 320m^3
2. ELV's - 8 x 2 stacked 2 high = 320m^3
3. ELV's - 4 stacked 2 high = 80m^3
4. ELV's - 8 stacked 2 high = 160m^3
5. ELV's - 6 stacked 2 high = 120m^3
6. ELV's - 7 x 2 stacked 2 high = 140m^3
7. Tyres - 5 x 6 x 1 = 30m^3
8. Parts - 5.2 x 2.8 x 1 = 14.56m^3
9. Parts - 4.6 x 4.4 x 1 = 20.24m^3
10. Parts - 20' ISO Container - 38.3m^3
11. IBC - Antifreeze = 1m^3
12. IBC x 2 - Oil = 2m^3
13. IBC x 2 - Batteries = 2m^3
14. ELV in Depollution process = 10m^3
15. Oil Filter & Rag Bin -1 x 0.5 x 0.5 = 0.25m^3

AC ENVIRONMENTAL
Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF

N

- Fire Extinguisher
- Automatic Fire Extinguisher
- Sleeping Policeman
- Spill Kit
- Hydrosnake Storage
- Hydrosnake deployment
- Sleeping Policeman
- Quarantine Area (showing 6m buffer zone)
- Concrete Surface
- Hardcore Surface
- Covered Area
- CCTV Camera

CLIENT
Milton Goughs

SITE
Shaw Ln
Cudworth
Barnsley
S71 3HJ

PROJECT
Permit Application

TITLE
Fire Prevention Plan

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:300	Apr 2026	T Kearns	D Alcock

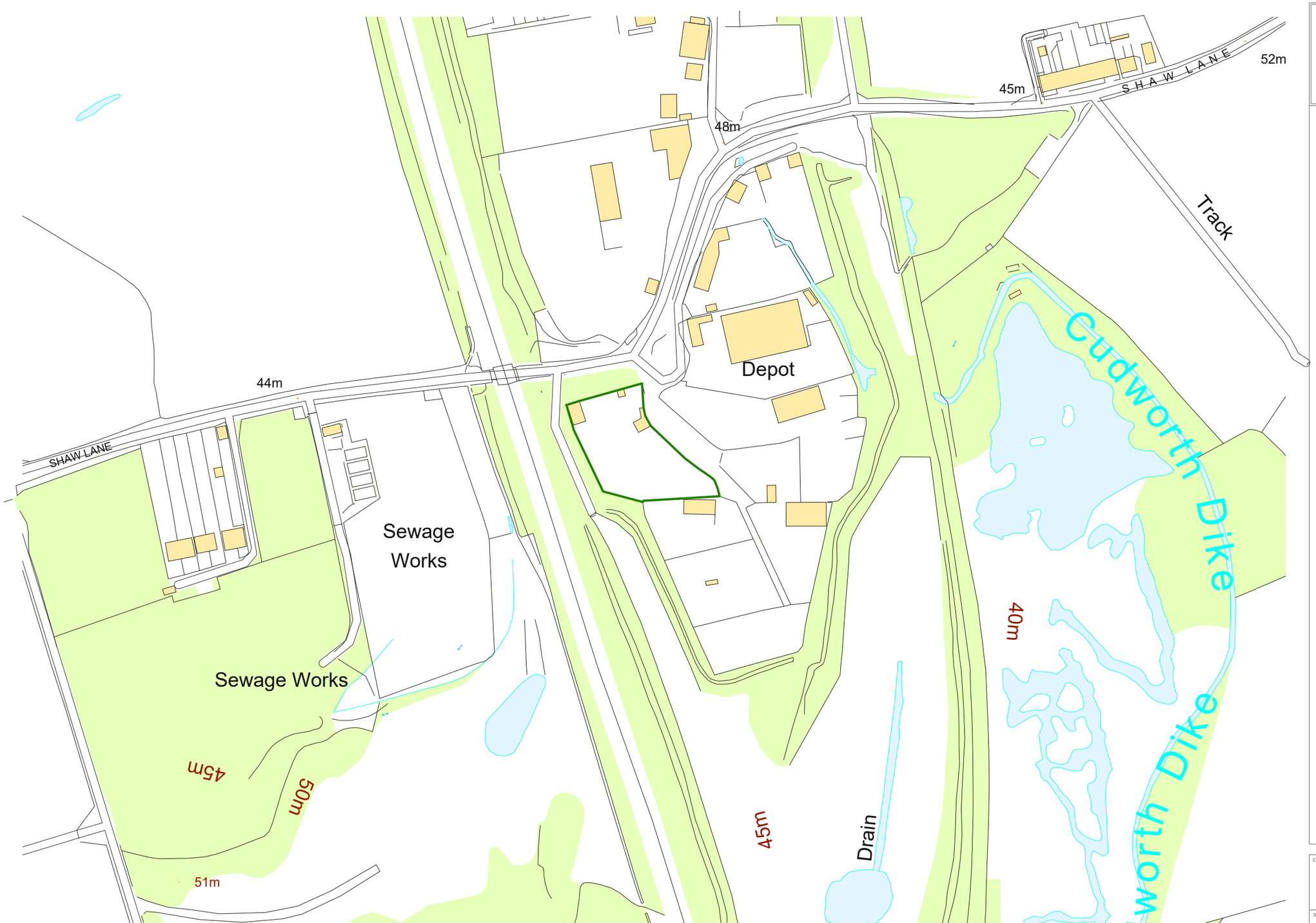
DRAWING NO
260310MG101

REVISION

REV	DATE	DETAIL

APPENDIX 2 – SITE LOCATION PLAN LAYOUT: 260310MG101

AC ENVIRONMENTAL
Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF



REV	DATE	DETAIL

CLIENT
Milton Goughs

SITE
Shaw Ln
Cudworth
Barnsley
S71 3HJ

PROJECT
Permit Application

TITLE
Site Location Plan

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:2500	Mar 2026	T Kearns	D Alcock

DRAWING NO
260310MG102

REVISION

APPENDIX 3 – SENSITIVE RECEPTORS PLAN REF: 260310MG101

EDUCATIONAL

1. Carlton Primary School
2. Outwood Academy Carlton

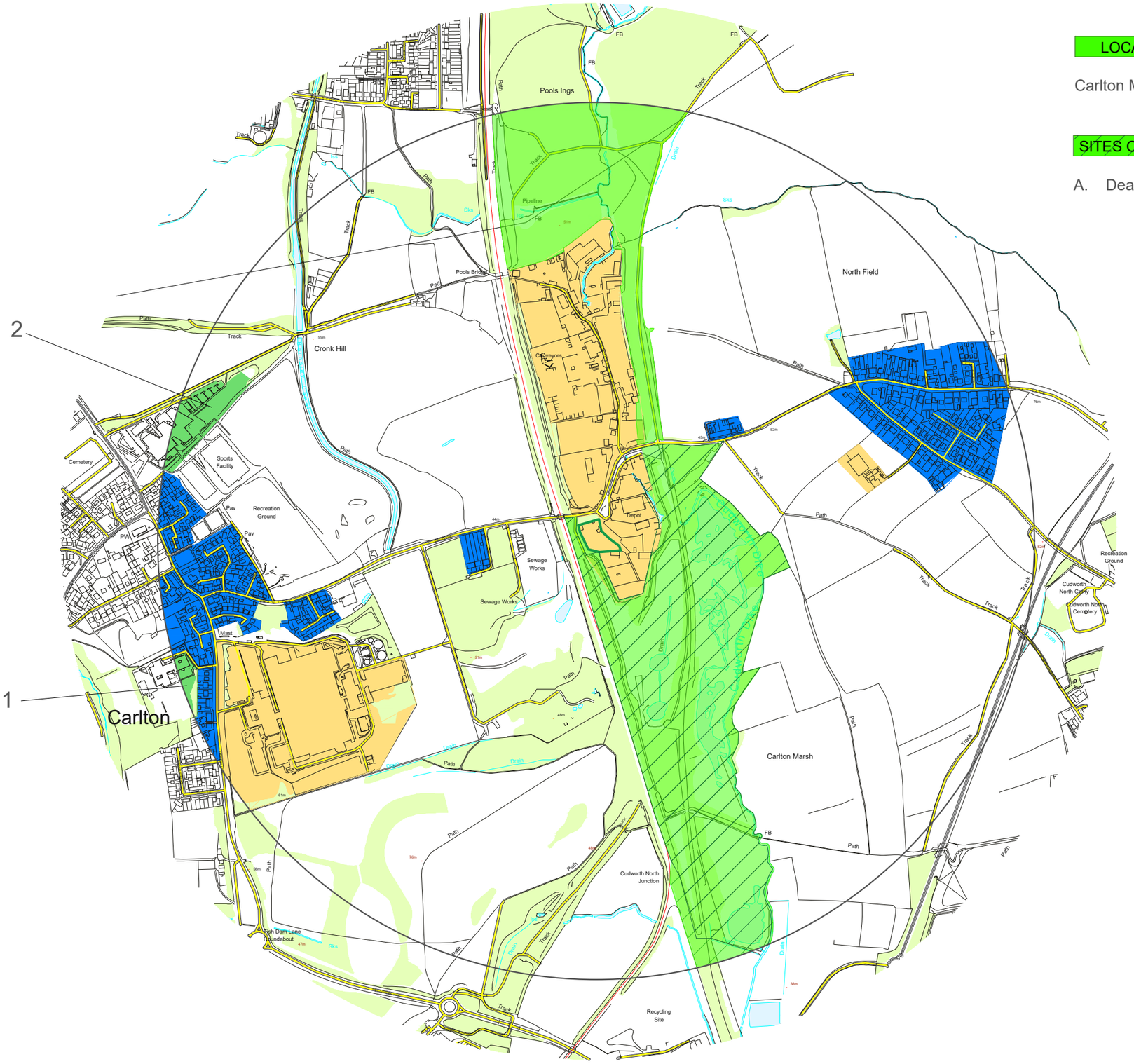
LOCAL NATURE RESERVE

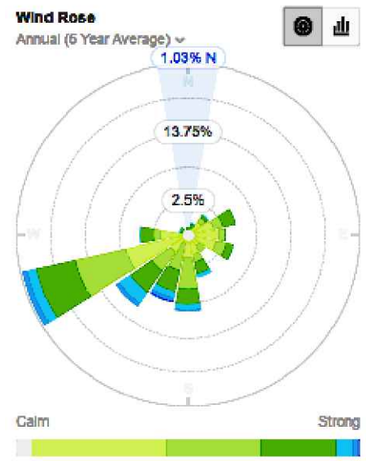
Carlton Marsh (mapped boundary not verified)(LNR)

SITES OF SPECIAL SCIENTIFIC INTEREST

A. Dearne Valley Wetlands (SSSI)

AC ENVIRONMENTAL
Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF





- Residential
- Commercial / Industrial
- Educational
- Road
- Rail

CLIENT
MILTON GOUGH

SITE
Shaw Ln
Cudworth
Barnsley
S71 3HJ

REV	DATE	DETAIL

PROJECT
PERMIT APPLICATION

TITLE
KEY RECEPTOR PLAN

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	MaR 2026	T Kearns	D Alcock

DRAWING NO
260310MG103

REVISION

APPENDIX 4 – CONTACT DETAILS FOR SENSITIVE RECEPTORS

Name	Contact Number
Carlton Primary School	0113 378 3040
Outwood Academy Carlton	01226 728494
Network Rail	03457 11 41 41

APPENDIX 5 – FIRE WATCH FORM

Fire Watch Form

To be completed every day by the Operations Manager or nominated person. Keep completed forms in file in Site Office. This is in addition to the Daily Diary

Fire Watch Inspection	Checked by (initial)	Time	State condition & action taken
Mobile and fixed plant and equipment - Hot exhausts and engines			
• Check for signs of fire, smoke, heat, and dust settling on hot exhausts & engines. • Check for leaking fuels and oils from fixed and mobile plant and vehicles • Ensure that all portable electrical equipment is unplugged • Ensure that plant extinguishers are the correct pressure and in good condition			
Forklift Trucks			
All waste stockpiles, ELV's and containers of waste			
• Check for signs of fire, smoke, heat, and dust settling on piles / containers • Check all containers are accessible on one side at all times • Check all stockpiles are accessible on one side			
Wastes			
ELVs			
Batteries			
Oils			
External containers			

APPENDIX 6 – FIRE WATCH PROCEDURE

Site Working Procedure - Fire Watch Procedure **SWP021**			
Issue:	1	Date:	08/10/2025
Written/Revised By:	Sam Davies	Approved By:	

1. Purpose

1.1 To identify situations that may lead to fire and to discover fire early to minimise the impact of any fire and to ensure that the safety of site staff, visitors and neighbours and to ensure that actions comply with the Fire Prevention Plan, Environmental Permit and the planning permission.

2. Responsibility

2.1 It is the responsibility of all site staff to follow this procedure and the site manager to ensure this procedure is implemented & followed.

2.2 Failure to follow this procedure will be considered a disciplinary matter and may lead to dismissal.

3. Fire Watch

3.1 A fire watch is a formal inspection of all stockpiled of waste held on site.

3.2 The fire watch shall be carried out by the nominated person, usually the Site Manager or supervisor.

3.3 The fire watch shall take place at the start and end of each day with one further inspection in the middle of the operating day.

3.4 The fire watch shall be a visual inspection of all stockpiles to identify steam, vapours, smoke of charring, the precursors of a fire. In addition to the visual inspection, temperature monitoring shall be undertaken to identify heating within stockpiles.

4. Actions in the event of discovering an issue

4.1 If a fire is discovered, the Fire Procedure (SWP020) shall be implemented immediately.

4.2 If one of the precursors to fire (smoke, charring etc) is discovered, site management shall immediately investigate further. Investigations shall include excavation of suspicious materials to identify the extent of the issue discovered.

4.3 Any stockpile which has been identified as having the potential to ignite due to evidence of smoke charring etc., once the immediate issue has been dealt with, shall be prioritised for removal from site for disposal at the earliest opportunity.

5. Actions to be taken

5.1 The site gates shall be closed to prevent unauthorised access by shall be manned to allow access for emergency services.

5.2 Site staff trained in the use of extinguishers and firefighting shall tackle the fire to attempt to extinguish it or to prevent the fire spreading. The fire may be fought with extinguishers, or pumped water from the fire hydrant. The Leader Stop fire blanket may also be used to put out any fires. Site management shall direct efforts to fight the fire until the emergency services arrive.

5.3 At all times full consideration shall be given to staff safety and if there is any doubt as to the ability of site staff to extinguish the fire, the site shall be fully evacuated until the emergency services arrive.

5.4 If the fire is large enough to warrant attendance of the emergency services, then neighbours shall be visited by site staff and advised to close windows and doors until such time as the Fire Service declare the fire is over and there are no lingering effects from smoke.

6. Reporting

6.1 The immediate actions of staff shall be to ensure the safety of staff and visitors. The secondary actions shall be to minimise the effect of the fire by attempting to extinguish or cover the fire with a Leader Stop blanket to prevent it from spreading.

6.2 When it is safe to do so, site management shall next notify the Environment Agency of the fire, providing details of the incident and the actions being undertaken.

APPENDIX 7 – SITE INSPECTION PROCEDURE

Site Working Procedure – Site Inspections **SWP016**			
Issue:	1	Date:	08/10/2025
Written/Revised By:	Sam Davies	Approved By:	

1. Purpose

1.1 To ensure the efficient operation of the site, mitigation of risk and to fulfil the requirements of the environment permitting regulations.

2. Responsibility

2.1 It is the responsibility of site manager to ensure this procedure is implemented & followed.

2.2 It is the responsibility of the site manager or duty COTC holder to carry out supporting inspections and monitor the operation of the site.

3. Daily and Weekly Inspections

3.1 The site manager will undertake a daily inspection of the site and record their findings in the Site Diary.

3.2 The COTC holder shall carry out regular visual checks of the site and to check for procedural integrity.

3.3 Either the Site Manager of the COTC holder shall undertake a formal weekly inspection and record findings on the Site Inspection Sheet.

3.4 In the event that the Site Manager conducts the Inspection, the COTC holder shall review this and countersign the Site Inspection Sheet as evidence of such review being carried out.

3.5 All issues to be reported to the site manager, who will allocate responsibilities to action any remedies that can be completed.

3.6 Complaints or reports of problems from neighbours or visitors shall be investigated in accordance with the Complaints Procedure.

4. Reporting & Records

4.1 Any problems to be noted in the site diary and incident logbook.

4.2 Any incident or breach of this procedure must be reported immediately to the site manager.

4.3 Records must be kept for 3 years.

APPENDIX 8 – HYDROSNAKES

HYDROSNAKE®

Creates a highly effective barrier
to the threat of floodwater
and is the ultimate replacement for the sandbag





Gravitas
International Ltd

Manufacturers dedicated to creating environmentally beneficial products

HYDROSNAKE®

The HydroSnake® is the solution to the inefficiencies of the traditional sandbag that have frustrated users for generations.

What is wrong with sandbags?



Besides their inherent poor performance as a floodwater barrier, sandbags are difficult to store, taking up substantial storage space for unknown period of time in anticipation of an emergency. Hessian or jute sandbags will normally rot in storage and woven poly-based bags will degrade after a short time in sunlight. They are excessively heavy and difficult to carry to site, each weighing between 15-20kg.

Sandbags are not easily disposed of and serious additional costs are incurred by transporting them away for safe disposal. They are not eco friendly as they cannot be emptied into the earth once the floods have subsided.

Sandbags not only leak and filter water through them, but once in contact with flood- water, they pose a biohazard risk as they will absorb the any sewage and contaminants within.



What are the advantages of the HydroSnake®?



The HydroSnake® is the new modern method to create a highly effective barrier to the threat of floodwater in domestic & commercial properties.

The HydroSnake® weighs less than 0.5kg before contact with water, and can easily be stored in bulk for 5+ years before they are needed. It will absorb and lock in up to 20 litres of water, weighing approximately 20kg, and will retain this weight for up to 6 months in situ.



The HydroSnake®'s absorbent core contains a stablised mixture of FSC wood pulp and super absorbent polymer (SAP), both of which are degradable after 6 months. After use, the outer sack can be slit and the contents can be emptied into the earth without any harmful effects.

The HydroSnake® is designed in bright red for optimum visibility, and is easy to move once activated, reducing the risk of injury. The unique 3-section structure allows for a controlled spread of weight, which prevents the contents from moving side to side.

Gravitas International Ltd

HydroSnake® is manufactured exclusively in the UK by:

Gravitas (International) Limited
219 Ashley Road,
Hale,
Altrincham,
Cheshire,
WA15 9SZ
UK
+44(0)161 980 1016
info@gravitasint.com
www.gravitasint.com

HydroSnake® Technical Details:

Length:	145cm	Internal Pads:	9/Snake
Width:	25cm		
Absorption:	15-20 litres	Non-toxic, EcoFriendly	
Inflation Time:	2-3 mins		
Weight before:	0.5kg	Floodwater Depth:	5cm
Weight after:	15-20kg		
Handles:	2	Floodwater length:	140cm
Outer Fabric:	Nwvn polyprop, hydrophilic		