



East Bank Road Treatment Facility

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# Fire Prevention and Mitigation Plan

Document Reference: 2204A/FPMP

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## Notice

This report was produced by Land & Mineral Management for GD Environmental Limited to provide a Fire Prevention and Mitigation Plan for the road sweeping waste operation at their East Bank Road Treatment Facility at Units 18A and 19, East Bank Road, Felnax Industrial Estate, Newport, NP19 4PP.

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## Document Control

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## Drawings

Reference	Title
WW01.01	Permit Layout

## Appendices

Appendix A	Sensitive Receptors
Appendix B	Contact Information

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## Foreword

GD Environmental Limited (GD) has an environmental permit with Natural Resources Wales (NRW), reference EPR/XP3833UB, for their East Bank Road Treatment Facility on the Felnex Industrial Estate in Newport. The permit is an installation permit for the storage and treatment of hazardous and non-hazardous wastes, including liquids. GD wish to add a road sweeping recycling facility to its permit within an area of the permitted site, which is not used for the main, or any associated, existing installation permit activities. In effect the road sweeping operations are a standalone and separate, non-related activity, to the main installation activities.

The current installation activities do not require a Fire Prevention and Mitigation Plan (FPMP) however the road sweeping operations will generate street cleaning residues containing non-hazardous plant based materials (LoW 19 12 12) and as this is a combustible material, a FPMP is required. To be clear this FPMP is only for the road sweeping operations.

The FPMP deals with the practicalities of maintaining a road sweeping operation whilst meeting the objectives:

- to minimise the likelihood of a fire happening.
- to mitigate the effects on the community and the environment from a fire.
- to minimise the resources of third parties required during a fire.
- to reduce clean-up and remediation costs.

This FPMP has been prepared taking into account the constraints of the site and its surroundings, together with consideration of various fire guidance documents, including those from NRW, EA, BRE and WISH.

# 1 Overview

## Operator and Permit

- 1.1 The operator will be GD Environmental Limited (GD) and the activities will take place under environmental permit reference no. EPR/XP3833UB.

## FPMP Permitted Activities

- 1.2 The site activities covered by this FPMP are the storage of street cleaning residues containing non-hazardous plant based materials arising from a road sweeper/gulley operation which processes non-hazardous wastes through a wash plant, to recover inert materials for use as recycled aggregate.
- 1.3 This FPMP covers a single waste type LoW 19 12 12 organic material (non-hazardous wastes), which is a by product of the road sweeping treatment process.

## Site Location

- 1.4 The site address is:

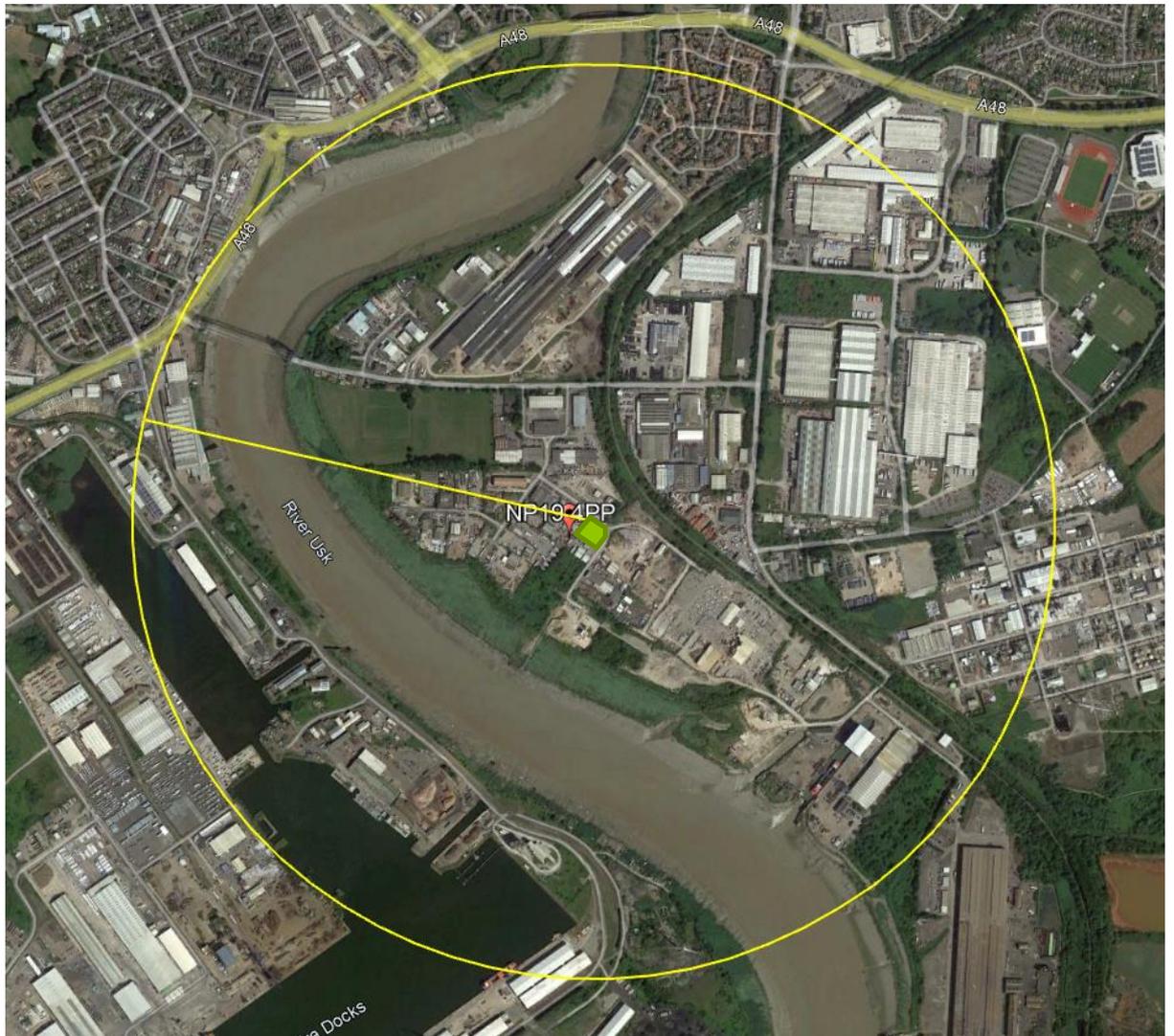
East Bank Road Treatment Facility, Units 18A and 19, East Bank Road, Felnax Industrial Estate, Newport, NP19 4PP

Grid Ref: ST 32528 85792 (centre of permit EPR/XP3833UB)  
ST 32534 85822 (site entrance)

## Site Context

- 1.5 The East Bank Road Treatment Facility is located approximately 2km south east of Newport city centre, see figure 1 overleaf, in an extensive industrial area which has a variety of heavy industrial uses ranging from steel works to waste sites, manufacturing operations as well as storage compounds and various commercial and office sites. Associated with this, is an extensive communication network with road, rail and dock facilities within 1000m of the site.
- 1.6 The nearest conservation sites are to the west, associated with the banks of the River Usk with Marshall's SINC (local conservation site) then the River Usk itself which at this point is a Site of Scientific Interest (SSSI) and also a Special Area of Conservation (SAC). The River Usk is also the nearest waterbody. The nearest residential property is an isolated property on Stephenson Street to the north, followed by Lysaght Village 750m to the north. There are no schools or hospitals within 1000m of the site. Full details of sensitive receptors within 1000m of the site are provided in Appendix A.

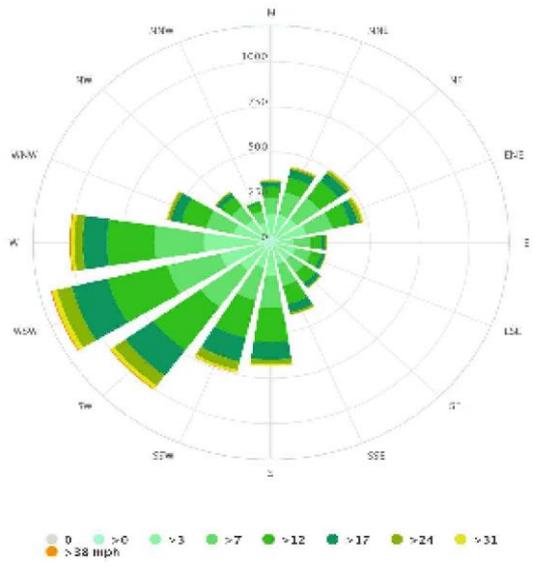
**Figure 1: Site Location**



### **Wind Direction**

- 1.7 The prevailing wind is from the west south west, see wind rose in figure 2. The downwind receptors are industrial workplaces and the railway line and two SINCS. The impact of a fire incident on these receptors would be from smoke which would be of a short duration with no lasting impacts.

**Figure 2: Wind Rose Newport Docks (0.5km west of site)**



## Combustion Products

1.8 Table 1 outlines the potential combustion products generated from a fire incident.

**Table 1: Potential Combustion Products from Fire Incident**

Combustion Product	Possible pathway to receptors
Fire waters	Surface waters: however overall contained drainage system will ensure impacts do not extend beyond permit boundary
Burnt Material	None: immobile, so no impacts beyond site boundaries
Steam	Air: Very quickly dissipates in atmosphere, no impacts anticipated beyond site boundary
Gases	Air: Very quickly dissipates in atmosphere, no impacts anticipated beyond site boundary
Thermal Radiation	Air: Very quickly dissipates in atmosphere, no impacts anticipated beyond site boundary
Smoke	Air: Smoke to be blown off site onto adjacent land/receptors. Will dissipate in atmosphere and will be time limited to the incident with no permanent impacts. Any community receptors downwind would be notified of the need to close windows during an incident and to stay indoors.
Dust/ash	Air: Smoke to be blown off site onto adjacent land/receptors and cause soiling when it settles. Any community receptors downwind would be notified of the need to close windows during an incident and stay indoors. Firefighting techniques would include the spraying of smoke with water to bring down particles in the air and reduce escape off site.
Soot	

- 1.10 From looking at table 1 the combustion products with the potential to impact the local community are smoke, dust/ash/soot. The impact is dependent on the duration of an event, therefore minimising the duration of an incident is the priority. How the receptors are impacted is also dependant on weather conditions i.e. smoke, dust/ash and soot are all dependant on wind to mobilise them off site and as the distance from the site increases the impacts will reduce and dilute. Noting the prevailing winds and the closest nearest receptors are industrial operations it is not considered that there would be significant impacts from combustions products on these receptors.

### **Site Layout Details**

- 1.11 The site layout plan is attached, Drawing No WW01.01. This includes details of the general site layout showing waste storage and processing areas, access points and site buildings.

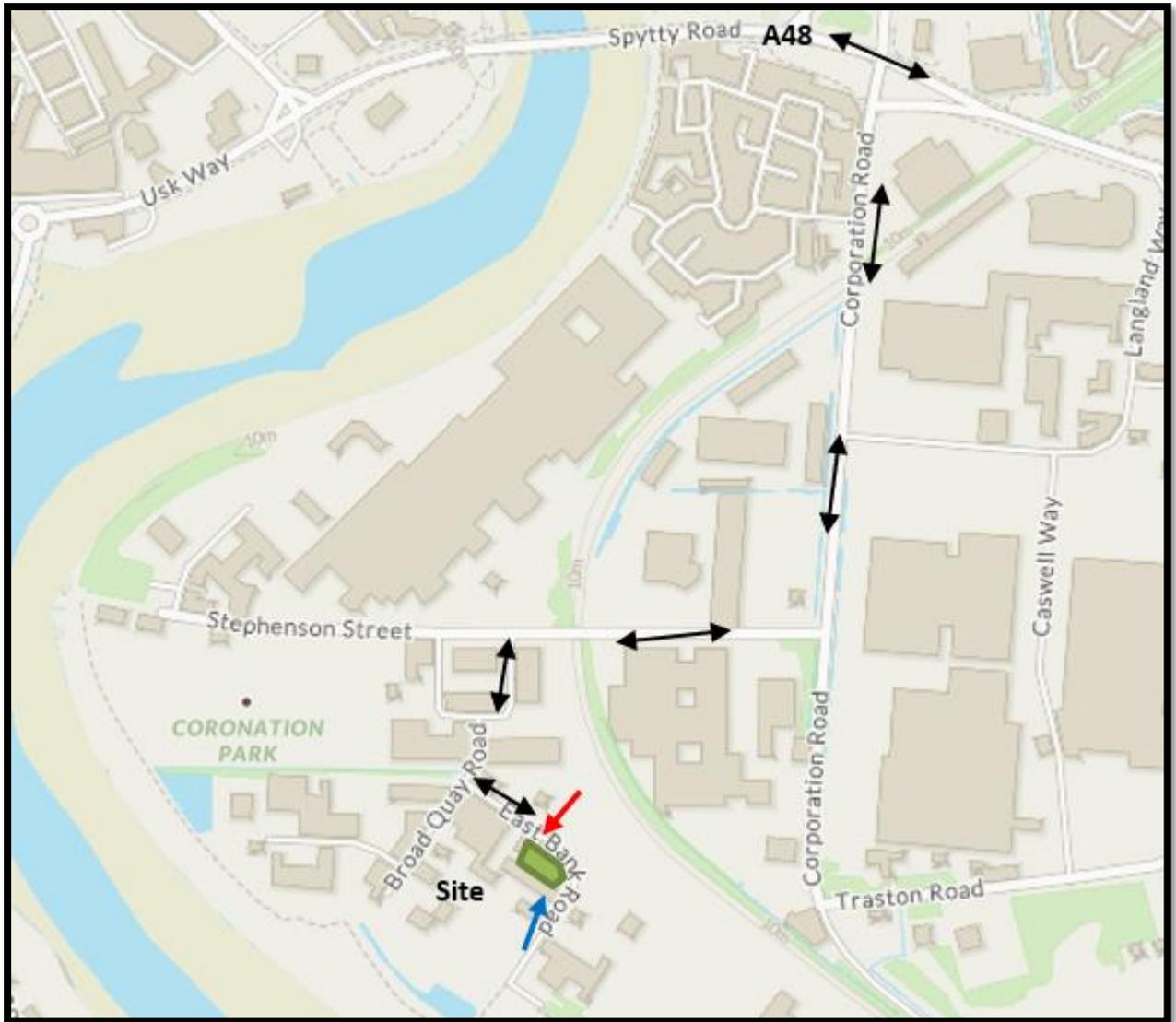
### **Site Access and Alternative Emergency Access**

- 1.12 The primary approach route to the site is from the north from the principle highway of the A48 dual carriageway, via Corporation Road, Stephenson Street, Mariner Way, Broad Quay Road onto East Bank Road. The main access point to the site is from the north (red arrow, Figure 4) but it can also be accessed from the south in an emergency, see Figure 4. All the roads leading to the site and the site accesses themselves are of a sufficient size to accommodate large emergency vehicles.
- 1.13 The main access and alternative access will be kept clear at all times from any processing or storage operations to ensure full access and unobstructed circulation of emergency vehicles. The majority of the site is an open yard area with a level surface and so the site is fully accessible to all vehicles including emergency vehicles.
- 1.14 The alternative approach from the south would only be used in an extreme situation e.g. when smoke prevented access from the north (which is assessed as unlikely).

### **Contact details**

- 1.15 Site contact details together with emergency contacts and neighbouring businesses are provided in Appendix B.

**Figure 4: Emergency Access Routes**



### Off Site Emergency Pack

- 1.16 An off-site emergency information pack will be held in the weighbridge of the operator's adjacent waste transfer station on the opposite side of East Bank Road.

## 2 Waste Material, Product and Process

### Permitted Activities

- 2.1 This FPMP is for a road sweeping recovery operation, with non-hazardous waste processed through a wash plant to separate the different materials, enabling the recovery inert inorganic materials, which can be used as recycled aggregate (R3 Recycling/reclamation of organic substances, R5 Recycling/reclamation of inorganic substances and R13 Storage pending recovery operations).
- 2.2 The waste types accepted by the road sweeping operation site are only Gulley/Sweeping Waste LoW 20 03 03 which after processing produces inert mineral (LoW 19 12 09) and organic material (19 12 12) which is essentially plant materials. LoW 20 03 03<sup>1</sup> and 19 12 09 are non-combustible wastes and do not fall under the provisions of the NRW FPMP requirements.
- 2.3 The road sweeping operation will handle a maximum of 25,000 tonnes per annum with an average weekly processing capability of 500 tonnes. It is anticipated that whilst there will be some variation in throughput it will not fluctuate greatly. There is limited storage of materials on site, with a maximum storage of 60 tonnes.

### Waste Acceptance

- 2.4 The waste arises from road sweeper operations. Head office conducts an initial assessment as to the suitability of the arising waste material from a contract to ensure it is suitable for the East Bank Road facility.
- 2.5 Guidance is given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types which are acceptable at the site, to ensure any waste brought to site complies with the correct waste types and is free from contaminants. The bulk of the waste comes direct from a limited number of suppliers, the main one being local authority road sweepers.
- 2.6 Where waste is brought in under sub-contract, or is delivered by other hauliers, the carrier registration details will be taken (for all new haulage operators bringing waste to the site) and

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<sup>1</sup> Although organic material is contained in LoW 20 03 03 the majority of this is made up by water rendering the waste non-combustible.

details will be periodically checked with the NRW/ Environment Agency to ensure that they are still registered. The procedures below are followed prior to the receipt of waste on site.

- 2.7 When a GD employed driver arrives at a customer site to collect a consignment of waste, (s)he will inspect the load for conformity with relevant regulations and safety procedures.
- i. If the load is satisfactory the driver will sign the relevant paperwork and remove the load from the customer's premises.
  - ii. If the waste does not meet the description stated on the controlled waste transfer note the customer will be advised to check the note and give a more detailed description of the waste.
  - iii. If the more detailed description of the waste reveals that the waste is not permitted at the transfer site then the customer will be advised to contact the NRW/Environment Agency to find an alternative site.
  - iv. The driver may also report back to the site manager for instructions.
  - v. Where it is suspected that the details given on the transfer note are incorrect the NRW/ Environment Agency may be contacted for advice.
- 2.8 GD has supporting operational procedures, OP-012 Grit Buster Waste Procedures, covering this activity. Documentation is checked on arrival to ensure an appropriate waste transfer note has been completed. The waste is also visually checked before it is permitted to be unloaded. If the initial check and documentation indicate that the material is allowed under the Permit it is directed to unload. If the material is not permitted or the inspection shows that it contains foreign bodies/un-permitted materials for example material not included in the permit or if there is a suspicion of chemical contamination (e.g. a strange colour or smell), the load is refused and not accepted at the site. A record of any load refused (rejected) is made in the Site Diary.
- 2.9 Following the initial acceptance, the material is directed into a tank which links to the processing plant.

2.11 The following is recorded for each load of waste:

- i. The date and time of delivery.
- ii. The name and address of the waste producer.
- iii. Location of waste arisings.
- iv. The type (including EWC codes) and quantity of waste (in tonnes or cubic metres).
- v. The waste carrier's name, address and registration number.
- vi. Driver's name, signature and vehicle registration number.
- vii. Signature or initials of person accepting/ inspecting the waste.
- viii. Additional handling details/notes made by the driver after inspection of the load .

2.12 Records are kept on site and are available for inspection by the NRW with reasonable notice. Alternatively, information can be supplied on request. Commercial information will be regarded as confidential. Within one month of the end of each quarter details of the waste movements are forwarded to the NRW on the appropriate form.

### **No acceptance of waste**

2.13 In addition to the general waste acceptance procedures outlined above, material will not be accepted onto site if at any point during the working day the following conditions preventing normal working operations arise:

- Insufficient storage capacity,
- Extreme weather conditions,
- Abnormal site conditions e.g. critical infrastructure failure, a fire incident.

2.14 Details of such events will be recorded in the Site Diary.

### **Waste Acceptance: Incompatible/hot loads**

2.15 The nature of the waste accepted to site is such that heated loads will not occur, irrespective a heated load would not represent a fire risk given the load will be in liquid form.

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### **Waste Acceptance: Permitted Waste**

- 2.16 The majority of this waste will be sourced from municipal street cleaning contracts which has not been subject to any treatment.

### **Waste Treatment: Processing**

- 2.17 The processing operations involve physical treatment (washing) to separate and size material using mobile plant (Gritbuster). The treatment does not use heat nor result in the generation of heat. The organic material is screen/floated off and collected in a skip, separating it from the water and mineral mix.

### **Waste Storage: Combustible Waste**

- 2.18 The only combustible waste is the separated organic material. This material is variable in nature and site but is typically >100mm. The material is not subject to any further treatment after its separation and deposit into the skip. The material is only stored in a skip beside the plant and no further treatment takes place on this material.

### **Storage Times**

- 2.19 Separated organic waste material is only stored on site for a matter of days and arrangements will be made remove the skip from site when it is two thirds full. The maximum storage duration does not exceed one week which complies with NRW guidance for organic material which recommends a maximum storage period of 3 months.

### **Storage Pile Sizes**

- 2.20 The organic waste material is stored in a single skip with dimensions of 2.29m x 1.52m x 1.07m high giving a maximum capacity of 3.75m<sup>3</sup> and a footprint of 3.5m<sup>2</sup>.

### **Storage Arrangements**

- 2.21 The organic waste material is stored in a loose form in a container, a skip. The waste arisings are not subject to seasonal fluctuations and together with the limited nature of the organic arisings. Issues of rotating material to avoid long storage durations do not arise.

### **Storage Building Considerations**

- 2.22 The organic waste material is stored in a skip inside a building. The storage quantities are very limited and there are no other combustible wastes stored in the building such that it is not considered that fire walls/bays are required. The building is not heated and there are no areas

of office or welfare accommodation in the building. Large roller shutter doors provide a means for clearing smoke from the building. The skip is fully accessible and can be readily moved.

### **Separation Distances**

- 2.23 There will be a minimum separation distance between of 6m between the storage skip and any other combustible materials or potential ignition sources.

### **Storage Quantity**

- 2.24 The maximum amount of organic waste material is stored on site is 3.75m<sup>3</sup>.

### **Combustible Waste Management**

- 2.25 Full records are kept when a skip is removed, providing a ready check of the storage duration times.

### 3 Preventing Fires

- 3.1 To prevent fires all practical measures will be taken to remove ignition sources, operate a robust acceptance/inspection regime and prevent self-ignition by controlling storage sizes, stock rotation and restricting storage times.
- 3.2 The following paragraphs details measures to combat common causes of fire and ignition sources.

#### Plant and Equipment

- 3.3 The plant and equipment used for the road sweeping operation is detailed in table 3.

**Table 3: Plant and Equipment**

Plant/Equipment	Fire Prevention	Inspection
Loading Shovel	inbuilt fire detection and suppression systems	Daily
360 excavator (grab/bucket)	inbuilt fire detection and suppression systems	Daily
Grit buster	inbuilt fire detection and suppression systems	Daily

#### Electrical and Exposed Cables

- 3.4 A schedule is maintained for the regular inspection and maintenance by a certified electrician of all electrical works on site, covering all buildings and plant. Records of inspections and maintenance works are kept by the site operator. There are no electrical installations within 6m of the combustible organic waste storage skip and no need for any electrical equipment to operate within its vicinity.

#### Naked lights, hot works and Smoking

- 3.5 The site has a strict no smoking policy on the site.
- 3.6 No naked lights, or hot works, are permitted on site.

#### Heat and Spark Prevention/Detection

- 3.7 The operation of all plant is done under continuous staff supervision which would allow the instant detection of any sparks/fire caused by plant operations.

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### **Gas Bottles and other Flammable Substances**

- 3.8 Maintenance works are undertaken off site and any materials such as gas bottles and other substances, such as oils and grease necessary for maintenance works, are kept off site in a lockable container and hence are well away from the waste storage areas.
- 3.9 No diesel is kept on site. Any refuelling necessary during the working day is done by a mobile diesel bowser with plant removed from the working area and away from any storage areas.

### **Fire Watch**

- 3.10 All site employees are briefed to remain vigilant across the site and look for signs of heating or fires throughout their working shift and to specifically check of any signs at the start and end of any breaks or shifts. All staff must immediately alert site management on discovering a fire.
- 3.11 The daily site inspection includes surveillance for any signs of heating or fires. At the end of the working, an hour after all machinery and plant has been turned off, a further site inspection will be undertaken by the responsible site operative to check for any signs of heating or fires.

### **Parking of Plant**

- 3.12 At the end of the working day all plant is either parked in the processing area, which is a minimum distance of 12m from the organic waste material storage skip.

### **Automatic Fire Detection Systems**

- 3.13 Smoke detectors are installed in the building which would raise the alarm in the event of a fire.
- 3.14 The site has a CCTV system covering the operational area, whilst not specifically designed for flame and heat detection, will provide an element of additional monitoring to assist the detection of fires outside working hours, with automatic notification out of hours to the operator for appropriate actions.

### **Industrial Heaters**

- 3.15 There will be no industrial heaters on site.

### **Exhausts and other Hot Machinery**

- 3.16 All machinery, including exhausts, will be constantly monitored whilst in use by the operative. All machinery will be cleaned down at the end of a shift day. As the waste operations involve handling wet material the risk of fire from accumulations of dust or fluff is considered to be very low.

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### **Open Burning**

- 3.17 There is no open burning permitted on site.

### **Incompatible Materials**

- 3.18 There is no possibility of any reaction between incompatible materials given that only a single waste code is accepted to site.

### **Neighbouring Site Activities**

- 3.19 The immediate neighbouring properties are a waste transfer station and storage operations, and offices which do not pose a fire risk.

### **Hot Loads Deposited on Site**

- 3.20 The nature of the waste operations mean that hot loads will not arrive at site.

### **Self-Heating /Self-Combustion**

- 3.21 Given the limited quantities of combustible wastes on site and the limited storage time that they will remain on site, this will mitigate against the risk of self-heating/self-combustion.

### **Monitoring**

- 3.22 There is daily monitoring of the combustible waste storage. This is done by means of visual inspections conducted at the start and end of the working day.

### **Contingency Arrangements: Storage and Emergency**

- 3.23 In the event of an incident on site, the operator will instigate transport management contingency arrangements to divert any incoming wastes to other facilities.

### **Seasonality**

- 3.24 Issues of seasonality of waste arisings are not applicable to this operation.

### **Arson/Vandalism**

#### Security

- 3.25 The site is remote from public areas situated in an extensive industrial complex. No members of the public are allowed on site. The site itself is securely enclosed by palisade fencing and has lockable gates. The gates are only open during working hours, when operatives are on site. The gates are located close to the weighbridge office allowing surveillance of people and vehicles entering the site. The site has a CCTV system with live streaming access. The CCTV live feed is

monitored outside working hours allowing for the prompt instigation of appropriate action in the event of unauthorised access or an incident.

### Leaks and spillages of oils and fuels

3.26 All plant and machinery are regularly maintained and inspected. Any defects, such as fluid leaks, are dealt with immediately and any machine leaking oil or fuel will not be used until repaired. Any leaks of oils or fuel will be immediately dealt with and contaminated materials will be removed off site to an appropriate disposal facility. Spill kits are kept on site and any spillage/leak incidents will be fully recorded in the site diary.

### Ignition Sources

3.27 Operations on site are designed to keep sources of ignition separate from the organic waste material storage skip. The FPMP deals with the management of various ignition sources under separate headings, table 3 provides a summary of ignition sources and how they are managed.

**Table 3: Summary of Ignition Sources and their Management**

Source of Ignition	Prevention/Management
Arson/Vandalism	Site Security measures including 24 hr CCTV and secure site boundaries.
Self Combustion	Storage times and pile sizes are well below NRW guidance levels and as such there is not considered to be a risk of self combustion from the inorganic waste material.
Plant or equipment failure	Regular full inspection of plant and maintenance beyond manufacturer's specification.
Electrical faults	Regular electrical inspections/testing undertaken. No electrics in vicinity of waste storage skip.
Naked lights	None allowed on site, restricted area for smoking for staff provided away from waste storage skip.
Discarded smoking materials	No fires allowed on site.
Hot works	No hot works will take place within the permit boundary.
Industrial heaters	None used on site.
Hot exhausts/plant engines	Plant subject to continual monitoring during the course of working operations. Dust and dirt (and potential for accumulation) is limited

	given wet operations. All plant and vehicles are left in a clean condition after each shift.
Open burning (on site or adjacent land)	No fires allowed on site. No burning takes places on surrounding land.
Damaged or exposed electrical cables	Regular electrical inspections/testing undertaken. No electrics in vicinity of waste storage skip.
Reactions between incompatible materials	Single waste stream not subject to chemical reactions. Waste acceptance procedures ensure no non-permitted/incompatible material is accepted at the site.
Neighbouring sites activities	Largely surrounded by uses posing little fire risk.
Sparks from buckets	Site operatives to watch for sparks and initiate procedures if a spark starts a fire.
Hot loads	Not applicable for type of waste handled.

## 4 Firefighting

### Firefighting – General

4.1 Firefighting will be undertaken by site staff when safe to do so. On discovering a fire during the working day all members of staff are instructed in the following procedures:

1. Raise the alarm.
2. Inform the TCM or on site senior staff – the TCM will immediately:
  - Assess the scale, location and intensity of the fire.
  - Bring into effect fire-fighting actions to begin immediately and safely in the affected area.
  - Call the Fire Service if required.
  - Direct staff for fire fighting purposes.

On hearing the alarm staff are instructed to:

3. Evacuate the site including, where safe to do so, shutting down plant and machinery.
4. Assist with any fire fighting as directed by the TCM (this will only apply to suitably fire fighting trained staff).
5. Notify by mobile phone Head Office to make arrangements for divert any incoming wastes (responsibility of TCM or in his absence the designated on-site deputy),
6. Recommence operations only when the TCM directs it is safe to do so,

4.2 Out of hours, there will be no processing operations or movement of plant and machinery, with plant parked away from the waste storage skip. Out of hours, on discovering a fire, the procedures are:

1. Raise the alarm.
2. Contact TCM/out of hours contact.
3. Assess the scale, location and intensity of the fire.

4. Bring into effect fire-fighting actions to begin immediately and safely in the affected area.
  5. Call the Fire Service if required.
  6. Inform Head Office.
- 4.3 In the event of a fire during the working day, all site processing operations will cease, no waste will be accepted to the site and all machines not used in firefighting in the affected area will be switched off and moved to a safe location. Operations at the site will not recommence until it is safe to do so without risk to the environment. Similarly, in the event of a fire outside normal operating times, the site will not reopen until it is safe to do so without risk to the environment.
- 4.4 Contingency arrangements for the diversion of waste will be activated to redirect any incoming wastes to the other facilities, as discussed previously.
- 4.5 Should the emergency services be called out the Site Manager will be responsible for liaising with them on their arrival.
- 4.6 Out of hours, staff and managers will be on call to attend the site to enable plant and machinery to be used in assisting the fire service.

#### **Fire Fighting –Strategies**

- 4.7 The main strategy for firefighting is that no attempt will be made to move any of the combustible material. The material will be kept contained in the skip and water/foam will be applied directly into and onto the skip.
- 4.8 It is anticipated that the scale of an incident, given the maximum amount of material is very limited, will be not result in an excessive duration.

#### **Fire Fighting – Initial Response**

- 4.9 The initial response on the outbreak of a fire will be to use hand held extinguishers and if required apply water from the reception tank of the Gritbuster.

#### **Firefighting – Movement of Material**

- 4.10 As mentioned above, no attempt will be made to move burning material.

## **Fire Service**

- 4.11 The fire service would be called in the event that site staff were unable to extinguish a fire within 30 minutes.

## **Controlled Burn**

- 4.12 GD do not propose to use 'controlled burn' as a firefighting technique at East Bank Road. A controlled burn would only take place with prior agreement with the NRW, Fire Service and Public Health Wales.

## **Firefighting Equipment**

- 4.13 Fire extinguishers and/or automatic fire suppression systems are provided on each item of mobile plant. Additionally, fire extinguishers are situated strategically around the site and all are checked and serviced annually by a certified third party company. The location of the firefighting equipment is shown on the accompanying plan WW01.01.

## **Water Supply**

### Water Requirement – NRW Guidance

- 4.14 NRW provides a 'rough guide' of water requirements that 300m<sup>3</sup> of combustible material will need a water supply of 2,000 litres a minute for a minimum of 3 hours, which equates to 1,200ltrs per 1m<sup>3</sup> (or 1.2m<sup>3</sup> of water to 1m<sup>3</sup> of combustible material). At the East Bank Road with the capacity of the skip at 3.75m<sup>3</sup> this would give a water requirement of 4.5m<sup>3</sup>. Paragraphs 4.15 to 4.17 outlines the available water supply which meets the NRW water requirements.

### On-Site Water Supply: Gritbuster Tank

- 4.15 The water is kept in the reception tanks of the Gritbuster as part of the road sweeping treatment process. The water in these tanks would be the first water source used for firefighting, in the event of an incident. The capacity of each tanks is circa 25m<sup>3</sup> (total 50m<sup>3</sup>), however conservatively, it is estimated in the worst case scenario, the tanks will only be half full, giving an onsite availability of 25m<sup>3</sup> of water.

### Fire Hydrant

- 4.16 The nearest fire hydrant is found opposite the site entrance only 15m from the site entrance.

#### Mains Water

- 4.17 There is a mains water supply, however it is not anticipated this would be used for firefighting purposes.

#### Containment of Firewater

- 4.18 Fire waters will be contained in the skip, the skip's integrity will be checked prior to its use to confirm there are no holes or damage or other signs of leakage which would indicate that the skip was not water tight. Secondary containment is provided for by the building itself which has concrete walling with sand bags are available to block entrances. Tertiary containment within the site boundaries created by raised kerbing around the concreted yard areas<sup>2</sup>. In the event that there was the possibility of fire fighting waters escaping from the building external drains would be isolated with drain covers as appropriate

#### Quarantine Area

- 4.19 Quarantine provision for the site is identified on plan WW01.01. The quarantine area is a bare area of ground which is kept clear in line with NRW FPMP guidance. Excluding the surrounding separation distances, the quarantine area has a footprint of 2.29m by 1.52m. There is at least 6m separation around the quarantine area. This area will be kept completely clear. This complies with of the NRW FPMP guidance.
- 4.20 It is not anticipated the quarantine area will be used during an incident as the combustible wastes will be contained in the skip. However, after a fire the quarantine area may to be used check the burnt material has cooled.
- 4.21 When the area is used to cool heated material, initially material will be tipped onto the ground and spread over the ground. An assessment will be made of how to cool the material. Options to cool the material include simply spreading out the material or the application of water via a hose.
- 4.22 If heated material has been deposited in the quarantine area, this will be kept under surveillance until the material is considered to have fully cooled. Then it will be loaded into another skip and removed to an appropriately permitted site. Currently the nearest disposal facility is the Docksway Landfill.

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<sup>2</sup> There is a very slight fall from East Bank Road to the site ensuring any site waters are contained on site.

- 4.23 Full records will be maintained of materials brought to the quarantine area including the cooling treatment and removal for off-site disposal.

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### **Combustion Products**

- 4.24 Table 1 outlines the potential combustion products from a fire incident. All staff FPMP training will include how to apply water to a fire to effectively fight the fire and minimise the generation of combustion products.

### **Disposal of Fire Residues**

- 4.25 Burnt material will be removed from site to an appropriately permitted disposal site.
- 4.26 The used fire waters will be contained within the skip. The quality of the contained fire waters will be assessed as to its possible reuse, treatment or disposal, such that it does not pose any environmental risk. It is anticipated that the water will be treated at the waste installation site, as the other permitted site activities are permitted to accept and treat such contaminated waters. This would in effect be done immediately after an incident.

### **Reporting**

- 4.27 All fire incidents will be fully recorded, including investigation of the cause of the incident and any actions implemented. Full details will be provided to the NRW.

### **Review**

- 4.28 The contents of the FPMP will be kept under regular review by management. Notwithstanding the regular review the FPMP will also be reviewed in response to changes in operational activities, new legislative requirements and any relevant site incidents.

### **Training**

- 4.29 All staff are fully trained in fire procedures which includes up-date training and routine fire drills. Fire training forms part of the site induction training before staff can commence working on site. All nominated 'firefighting' operatives will have specific practical training at the site using the firefighting equipment and following procedures of the FPMP.
- 4.30 Refresher training and a full mock site incident exercise will take place at least once a year. Management will review the need to increase the frequency of fire training and exercises in response to staff turnover, changed site practises and any incidents or near misses. Full records will be kept of all training events.

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## Communication

- 4.31 An up-to-date FPMP will be kept in the site office available for inspection by all members of staff. An 'off site' copy of the FPMP will also be kept at the operator's adjacent waste transfer site in the weighbridge offices, so the document is readily accessible in an emergency situation to the NRW and the local fire service.
- 4.32 Visitors to the site will be made aware of the fire prevention and fighting procedures to ensure they understand their responsibilities.
- 4.33 In terms of communication during an incident, when a fire incident occurs the Site Manager will directly notifying any human receptor locations which are downwind of the prevailing wind at the time of the incident. When the Fire Service is involved with an incident their advice will be sought on who to contact and how the communication will be undertaken.

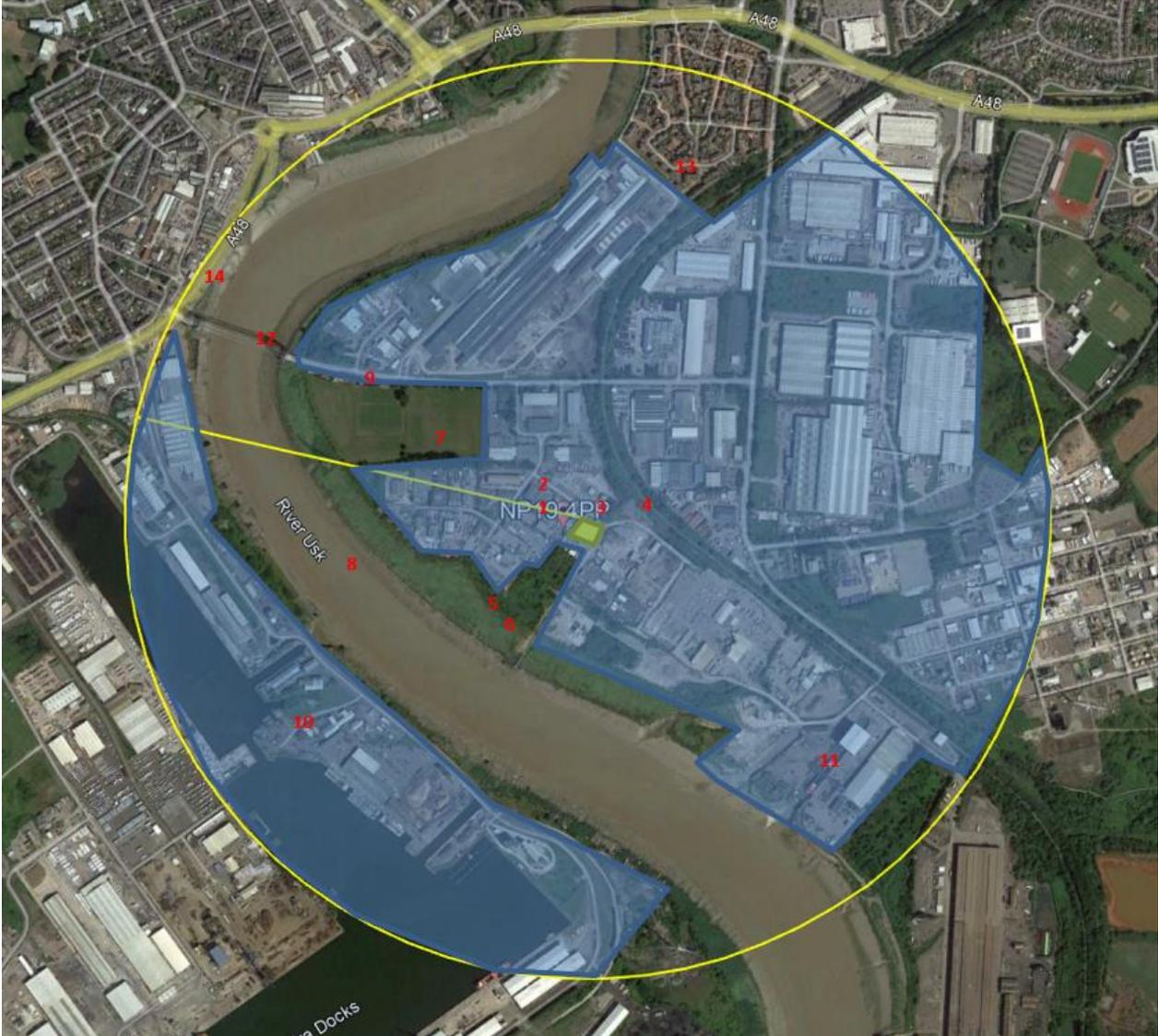
## Appendices

## Appendix A: Sensitive Receptors

## Sensitive Receptors

	Potential Receptor	Receptor Type	From Boundary of Permit	
			Distance (m)	Direction
1	Industrial (Blue shading on plan)	Workplace	0-1000	All
2	Local roads	Infrastructure	0-1000	All
3	Overhead Electricity Lines	Infrastructure	5	North
4	Railway Line (Private)	Infrastructure	110	North East
5	Marshalls SNIC	Conservation Site	220	South East
6	Welsh Coastal Path	Recreational	220	South East
7	Coronation Park	Recreational/community	250	North West
8	River Usk	Water and conservation (SSSI and SAC)	300	South East
9	Stephenson Street	Residential	525	North
10	Newport Docks	Water/Workplace/Infrastructure	625	West
11	Bird Port Docks	Water/Workplace/Infrastructure	680	South East
12	Newport Transporter Bridge	Infrastructure	700	North West
13	Lysaght Village	Residential	750	North
14	A48 Dual Carriageway	Infrastructure	975	North

Receptors Location Plan



## Appendix B: Contact Information

<b>East Bank Road Treatment Facility</b>	
Site Phone Number	
TCM	
GD Head Office	01633 277755
Emergency Services	999
Police HQ Incident Room	<b>101</b>
Local Police	<b>Newport Central Police Station, 3 Cardiff Rd, Newport NP20 2EH</b> <b>Tel: · 01633 838111</b>
Doctor	Park Surgery, 375 Chepstow Road, Newport, NP19 8XR Tel: 01633 277442
A&E	Royal Gwent Hospital, Cardiff Rd, Newport NP20 2UB Tel: 01633 234234
NHS Direct	<b>0845 4647</b>
Natural Resources Wales	24hour hot line – 0800 807060 Local Office – 0300 065 3000
<b>Electricity Emergency</b>	<b>Western Power 08006 703105</b>
<b>Water Services &amp; Emergencies</b>	Welsh Water 0800 052 0130
Local Authority	Newport City Council 01633 656656
<b>Company Contacts Out of Hours</b>	
Operator	GD Environmental 01633 277755
<b>Neighbour Contacts</b>	
Flo Gas	01633 281910
Junk4joy	01633 277755
Alfa Technology Training	01633 547214
Aquaspira	01633 281775

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MJ Lights	02920092700
KDK Metals	01633 270755
Noel Fitzpatrick Ltd	01633 290077

## Drawings



**Drawing No WW01.01 Site Layout**

