

Scrap Processing Centre Fire Prevention & Mitigation Plan

Procedure	ECP 44
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Revision	0
Date	May 2019

Prepared by: Environmental Manager

Approved by: Health & Safety Manager

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1.0 Key Information

SITE DETAILS			
Location: Rover Way, Cardiff			
Postcode: CF24 2RX			
SITE CONTACTS			
Name	Position	Office Hours (Mon-Fri 6am-6pm / Sat 6am-2pm)	Out of Hours
????	Scrap Processing Centre Supervisor	????	????
Paola Menghi	Scrap Handling Manager	07841 781342	07841 781342
EMERGENCY SERVICES			
Ambulance, Fire & Police		999	999
REGULATORS			
Natural Resources Wales (NRW)		0300 065 3000	0300 065 3000
Local Authority Environmental Health: Cardiff Council, Shared Regulatory Services (SRS)		0300 123 6696	-
OTHER KEY CONTACTS			
Name	Position	Office Hours (Mon-Fri 8am-4pm)	Out of Hours
Richard Lewis	Environmental Manager	07739 855918	07739 855918
Patricia Carranceja	Health & Safety Compliance Manager	07739 855927	07739 855927

2.0 Introduction

The purpose of this fire prevention plan is to ensure adequate control measures are in place to:

- minimise the likelihood of a fire occurring,
- aim for a fire to be extinguished within 4 hours
- minimise the spread of fire within the site and to neighbouring sites.

2.1 Risks of fires

2.1.1 It is recognised that fires involving wastes can cause significant harm to people and the environment:

- There is the risk of death and/or serious injury and health damage from high thermal energy and smoke inhalation
- Combustion products, even those from non-toxic materials, release airborne pollutants which can cause short/long term effects on human health and the environment
- Firewater run-off can transport pollutants into drainage systems, rivers and lakes, groundwater and soil, threatening water supplies, public health, wildlife and recreational use
- Explosions, sparks and projectiles can harm people and spread any fire
- Substantial property damage and subsequent financial losses

2.1.2 Examples of less direct sources of harm include:

- The significant burden for the Fire and Rescue Services (FRS) and other public agencies when responding to a fire may be both immediate and/or long lasting
- Civil claims from third parties relating to nuisance or potential health effects and fines and/or costs levied by environmental, fire and health and safety regulators
- Costs of clean-up, both on and off-site under the principle of the polluter pays.
- Damage to property and interruption to business and third party/neighbouring businesses
- Increased insurance premiums
- Costs to reputational
- Impact to environmental permit/licence/exemption

2.2 Site Waste activities

Waste activities to which this fire plan applies:

- Stockpiles of unprocessed incoming material
- Stockpiles of processed, undersize material
- Stockpiles of processed, stone and stainless steel

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- Stockpiles of processed, ferrous metals
- Skips of processed, non-ferrous metals

Types of combustible waste include:

- Stockpiles of processed, wood and plastic

Other activities

- Storage of lubricating oil for onsite plant and machinery

3.0 Site Materials Inventory

Table 1 – Site Materials Inventory

On-site Stockpiles and Storage	Maximum (tonnes)	Comments
Stockpiles of unprocessed incoming material (solid)	c. 3,000 tonnes (month)	Stockpile height of 12 metres.
Stockpiles of processed, undersize (solid)	c.150 tonnes (week) c. 600 tonnes (month)	Stockpile height of 4 metres.
Stockpiles of processed, stone and stainless (solid)	c. 300 tonnes (month)	Stockpile height of 5.5 metres.
Stockpiles of processed, wood and plastic (solid)	c. 176 tonnes (week) c. 700 tonnes (month)	Stockpile height of 3.8 metres.
Stockpiles of processed, ferrous (solid)	c. 500 tonnes (week) c. 2,000 tonnes (month)	Stockpile height of 3.1 metres
Skips of processed, non-ferrous) (solid)	As required	N/A

All materials shall be stored on an engineered surface composed of processed slag with underlying geotextile.

3.1 Receipt and Storage of Waste

All deliveries are weighed in at the site weighbridge by the Scrap Yard Supervisor.

The Scrap Yard Supervisor conducts an initial check of the load which, if found to be satisfactory, is allowed to be tipped and whereupon a thorough inspection is then made. In the event of any non-conforming items of waste being identified, these are either returned to the source facility or are stored in a clearly marked quarantine area for authorised disposal.

4.0 Whole Site Considerations

4.1 Protection of human life

To ensure suitable control measures are in place to protect personnel on site there are arrangements in place for adequate mean of fire escape that is clearly marked, lit where required, not blocked and kept unlocked during operational hours. There are effective evacuation procedures in place to which all staff are trained, and visitors inducted.

4.2 Location and neighbouring sites/ businesses/ environment

The site is located approximately 3-km east of Cardiff City centre at National Grid Reference (NGR) ST 21444 76235. The site is located south of the existing permitted installation that is located on the northern side of Rover Way. The following current activities have been identified surrounding the Site:

- NORTH – Rover Way beyond which is the main Celsa Manufacturing (UK) site and permitted installation. A Western Power 132 kV substation is located adjacent to the northern edge of the site. The closest residential receptors to the site are located approximately 470 metres north (Willow Avenue) across the main steel works site (that forms the main part of the permitted installation). Willows mixed High School is in the same area approximately 450 metres north of the site.
- EAST – Cardiff Motocross Centre MX and Minibike Track (Foreshore MXC track) beyond which is the Severn Estuary(200 metres).
- SOUTH – Tide Fields Road beyond which a welsh Water waste water treatment works, and other light industrial activities associated with Tremorfa Industrial Estate.
- WEST – Rover Way beyond which is the main Celsa Manufacturing (UK) Ltd site.

The site is adjacent (within 250 metres) of the Severn Estuary, which is designated a Ramsar Site, Special Area of Conservation (SAC), Special Protection Area (SPA) and a Site of Special Scientific Interest (SSSI).

Access to the site is via Rover Way.

4.3 Risk to sensitive receptors

The fire risk to sensitive receptors from the impact of our operations is low.

The nearest local fire service station is Cardiff Central Fire Station, Ely Fire Station, Cowbridge Rd W, Cardiff CF5 5BQ – approx. 16 minutes from site (8 miles dependent on route).

5.0 Managing common causes of fire/ sources of ignition

5.1 Arson

To minimise the risk from vandalism and arson the site is secured with perimeter fencing and CCTV; these arrangements include working and outside working hours. The site has 24 hour manned security.

5.2 Plant and Equipment

All plant and equipment will be maintained and be fitted with fire extinguishers. Mobile plant that isn't being used will be kept away from combustible material. Other controls include:

- Operators are instructed of the importance of ensuring materials are kept clear from around exhausts and igniting.
- In the event of fire, heavy plant may be used to relocate wastes on fire to designated areas where the fire can be tackled and away from sensitive areas where it could spread more easily. Plant may also be used to move waste away from a fire to prevent spread. All relevant plant operators will be trained as part of the emergency response plan. The training will include ensuring:
 - Making operatives aware that such action must only be done without risk to the health and safety of themselves or others.
 - Only suitable plant be used i.e. completely enclosed cabs, fire and heat protected hydraulic systems etc.

5.3 Electrical faults including damaged or exposed electrical cables

General electrical systems, such as lighting and heating are regular inspected this includes portable and fixed electrical equipment.

5.4 Discarded smoking materials

No smoking policy inside premises and provision of designated smoking areas situated away from combustible materials. All designated smoking areas are signed and supplied with receptacle for discarded smoking materials.

5.5 Hot works

No hot works will be undertaken in the area of the scrap processing centre.

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5.6 Industrial heaters

Not applicable – currently there are no industrial heaters on site.

5.7 Hot exhausts

Operatives to be instructed to clear material from around exhausts at end of each shift; this will be included in induction training, relative procedures and routine inspections.

5.8 Leaks and spillages of oils and fuels

Fuels and combustible liquids will be prevented from leaking or trailing from site vehicles. Fuel storage will be within flammable cabinets and be located at least 10 metres away from other sources of ignition i.e. naked flames. Spill kit stations will be provided around the site and available to clear up leaks/spillages and appropriate disposal of absorbent material will be arranged.

5.9 Build-up of loose combustible material, dust and fluff

General dust (i.e. dusts and small particle size combustible wastes, loose wastes etc) will be controlled by ensuring:

- Regular housekeeping and cleaning is maintained for all site areas including site machinery and buildings to keep dust and other combustible materials to a minimum
- Flammable materials, such as oils, greases, fuels, paints etc, are always stored correctly and put back in store after use.
- Routine site inspections are conducted to ensure good housekeeping is being maintained

5.10 Reactions between waste

Waste acceptance checks are in place to prevent unsuitable wastes being received; this is documented within internal management system procedures. These procedures are aimed to prevent unauthorised waste being accepted and where accidentally accepted limiting the impact; and include:

- a fire-watch at the end of each working day;
- not accepting high risk loads near the end of an operational shift or ensuring they are processed promptly and not left overnight;
- where possible, empty reception areas of waste at the end of each working day, or minimise the amount of waste left in reception overnight;
- employees in reception areas must be trained and instructed to look for fires, hot loads, hazardous materials and items, smoke and signs of smoulders – and know what action to

- take if they see one i.e. use of heavy mobile plant to move suspect loads to quarantine area, dousing suspect loads with water from a fire canon;
- ensure mobile plant operators spread wastes out when received to make identification of smoulders and hazardous items easier;
- provision of an 'emergency/quarantine area' for suspect loads

5.11 Deposited hot loads – quarantine area

A designated quarantine area will be located on site (refer to appendix 2 - Site Plan) to act as somewhere to place hot loads/ burning wastes to extinguish or move unburnt wastes to isolate and prevent catching fire.

The quarantine area is located within the boundary of the site, large enough to hold at least 50% of the volume of the largest pile or containers and have a separation distance of at least 6 meters around the quarantined waste.

The quarantine area will be kept clear at all times – unless it's being used in the event of a fire.

5.12 Site/plant shut-down

To reduce fires occurring outside of normal working hours the close-down procedures includes:

- Shut-off and lock-off of electrical power to plant
- Shut-off of other electrical items such as heaters
- Clearance of waste which have accumulated under equipment
- Ensuring that any flammable materials such as fuels are secured
- A fire-watch at least one hour after the end of operations
- Spread out any waste loads awaiting processing to ensure no undetected hot items or other materials which could start a fire
- Check that mobile plant has been moved to a safe distance
- Check that fire detection & security systems have been activated; gates secure etc

5.13 Waste reception

The reception facilities and temporary storage of wastes for short periods prior to treatment and/or transfer to another site will have:

- Tipping/reception area where scrap metal is discharged prior to processing
- Designated areas, where waste may be processed

Any other wastes and hazardous materials will not be accepted; if discovered attempts will be made to trace it back to the supplier and appropriate action taken to reduce the risk occurring again. Where required this will be reported to Natural Resources Wales. Waste reception will be in

external areas only.

6.0 Preventing self-combustion

It is recognised that many wastes can self-combust under certain conditions i.e. when a material which self generates heat at a faster rate than it can be lost to the environment. The temperature continues to rise in the material speeding up the rate of reaction and releasing even more heat. Eventually the material reaches auto-ignition and then self-combusts.

To prevent self-combustion storage times, pile volumes and height, and the temperature of the wastes are carefully managing.

6.1 Manage storage time

The maximum storage time of all scrap metal will be no longer than 3 months and stock will be regularly rotated. In general stocks will be processed and transferred from site well within a 3-month period i.e. 'first in, first out'.

The materials being stored on site are not subject to seasonal variation as they will be only supplied to our steelwork site in Cardiff (end user) which is a 24/7 operation, consuming over 1,000,000 tonnes of scrap metal per year which is received daily.

6.2 Monitoring and controlling temperature

Measures to control heat to prevent self-combustion include:

- visually inspecting stored wastes frequently (at least once a week as a minimum) and recording any significant findings within the site diary
- separate and segregate combustible content from within scrap metal
- staff are trained to detect and manage hotspots; and to include stock management
- routinely turning of piles to ensure the waste remains cold and any localised warming is dissipated quickly
- CCTV will be installed to monitor the yard remotely
- materials will be processed and transferred from site well within a 3-month period i.e. 'first in, first out';
- materials segregated through the yard will be processed and transported off site for treatment therefore eliminating the need to store for periods longer than 2-3 weeks.
- Implementing additional control measures such as increased stock rotation in summer months when the weather is warm and self-heating is more prevalent'

7.0 Managing waste piles

Where possible our policy aims to keep a continuous movement of waste to reduce the storage

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times, which will in turn help prevent the risk of self-combustion and limit the scale of a fire if one breaks out. The piles will be monitored, moved and turned on a daily basis to minimise internal heating.

Waste scrap metal piles will be managed to reduce the risk of self-combustion and to limit the scale of a fire if one breaks out; this will be done through minimising pile sizes and where possible, storing material in their largest form.

7.1 Material storage arrangements

For all waste piles/stacks, the maximum length or width will be no more than 20 metres with a Cumulative Maximum Storage Time of 12 weeks.

8.0 Prevent fire spreading

8.1 Separation distances

A separation distance of at least 10 metres between loose waste pile to loose waste pile and at least 13 metres between loose waste piles and any buildings, or other combustible or flammable materials will be maintained.

A clear area is established around the perimeter of the site allowing at least 13 metres separation distance from any waste piles.

9.0 Quarantine Area

Refer to section 5.11

10.0 Detecting fires

10.1 Fire Alert Procedures

- Regular visual inspections will be completed by the Yard Supervisor to check waste stock management and to quickly identify any issues.
- CCTV system will be installed to monitor the site remotely.
- There must be no hesitation in raising the alarm. Any person discovering a fire must immediately shout 'FIRE' to warn others in the vicinity. Fire alarms must not be used for any purpose other than as a signal for fire action or pre-arranged fire drills.
- Everyone must immediately leave the site and proceed directly to the designated assembly area upon hearing the alarm.
- The mobile plant/machine operators are, if possible, to remove their machines from the vicinity of the fire; park and turn off their machines at a safe distance from the fire without blocking any emergency access routes.

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- No-one is to return to the affected part of the site until it is confirmed safe to do so by the person in charge of the premises (Yard Supervisor).
- During normal operational hours, the person in control of the site must notify Fire and Rescue Service, and Natural Resources Wales immediately and delegate a member of staff to direct the Fire Service. In addition, the person in control must check that occupants of adjacent sites have been notified.
- During out of hours the senior security officer conducts notification.
- The person in control of the site must ensure that the site has been evacuated and in particular:-
 - Supervise the evacuation of visitors and staff.
 - Supervise roll calls and collate information e.g. persons not at the assembly point, information about the fire location and source.
 - Ensure first aid is given if required.
- On arrival the Fire Service will take charge and the person in charge must co-operate with the Fire and Rescue Service Officers. See Fire Service Act 2004 Sect. 45 for Fire Service Powers of entry.

10.2 Non-waste facilities on site

The main building (including mess room and toilets) will have a fire/smoke detection system, in line with building regulations. Fire extinguishers will be provided with training for personnel likely to use them.

10.3 Procedure in Event of Fire on Neighbouring Sites

In the event of a fire on a neighbouring site, sound the alarm immediately and initiate safe evacuation of all staff to the assembly area.

Ensure the adjacent operators are notified of the outbreak if not already aware.

The procedure on the displayed fire notices to be followed when an alarm is raised.

11.0 Emergency Fire Procedures

11.1 Prior to Fire & Rescue Service (FRS) Arrival

- Raise the alarm and initiate evacuation of people on site to the assembly area
- Dial 999 and call for assistance from Fire & Rescue Service;
- Ensure appropriate machinery is standing by to help assist the Fire & Rescue Service to create appropriate breaks as instructed;
- Firefighting Strategy - If safe to do so, use plant machinery to remove hot/burning materials to the fire quarantine area (isolate the source at least 6m away from any potentially flammable materials);

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- Management will delegate a person responsible to liaise with the emergency services and an operative to notify the neighbouring operations of the fire risk (see appendix 3 for nearby human receptors – contact details to be contained within site diary);
- Where practicable deploy sandbags to form barrier to prevent the uncontrolled discharge of firewater either to ground, sewer or soakaway.
- Ensure access to site is clear for Fire & Rescue Service to gain easy access by liaising Celsa gatehouse.
- Divert any incoming waste to an alternative Celsa facility if it cannot be returned to source.
- Notify Senior Celsa Management and Natural Resources Wales (contact numbers in section 1.0 Key Information, on page 1 of FPMP)

11.2 Emergency Fire Procedures (FRS Arrival)

- On arrival of the Fire & Rescue Services (FRS) the responsible person will provide this Fire Prevention Plan to assist in combating the fire.
- The responsible person must inform the FRS about what measures have been taken to tackle the blaze.
- The responsible person must inform the FRS of any potential sensitive receptors.
- To minimise the potential for fire water run off the use sprays and fogs rather than jets will be considered by the FRS. Water run-off will be managed through the use of sand bags and the existing drainage/interceptor system to provide containment and prevent pollution.
- Instigate a controlled burn; the final decision to do this will rest with the FRS's Incident Commander.
- Under FRS instruction, Celsa personnel will separate the burning material for the FRS to quench it with hoses or in pools of water. Hence reducing the amount of firewater produced.
- Where practicable, isolate and recycle firewater through the interceptor system.
- Where safe to do so, Celsa Personnel will assist in the removal of unaffected material using mechanical equipment as instructed by the FRS.

11.3 Post-Incident Procedures

- Remove all burnt material using appropriate and lawful disposal methods
- Stop any incoming waste from entering the site until it is deemed safe to do so.
- Contact clean up contractors where required including an approved supplier will be appointed to tanker away and dispose of fire waste water.
- Post incident reports and enquiries. Ensure any incidents are recorded on ProSafety. Initiate a thorough investigation to establish the root cause of any incident and provide sufficient control measures/actions to prevent re-occurrence. As part of this investigation an assessment must be made as to whether the site can be reinstated.
- Notify Natural Resources Wales, Local EHO and the FRS when the site has been reinstated. In the event of a fire this Fire Prevention Plan will be reviewed and improved as required and updated copies provided to the relevant authorities.

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12.0 Communication, training and drills

This FPMP including any relevant records will be readily available to access at all times, including during an incident. All records will be stored in the site office and will be communicated during the company site induction.

All employees, new starters and visitors will be inducted into the emergency arrangements to ensure they know how to prevent a fire occurring and what to do in the event of a fire. Any changes will be communicated through toolbox talks.

Drill and exercises will be undertaken at regular intervals to test how well the plan works and to make sure that site personnel understand what to do. These will be recorded and reviewed to identify any improvements and fed back to relevant persons.

Operational staff will be trained in the fire systems, firefighting techniques and importance of prioritising the protection of the health and safety of people on site before fighting the fire.

13.0 Review and Monitoring of FPMP

The FPMP will be reviewed on an annual basis unless one of the following circumstances occurs:

- A fire incident – full review required following output actions from any investigation
- New waste streams are added to the permitted activity
- Changes to the amount of waste received onsite and pile sizes
- Installation of new infrastructure e.g. new buildings, plant or equipment.

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14.0 Fire Risk Assessment

Table 2 – Potential Causes of Fire and Prevention Measures

Possible Cause	Applicable	Reason	Control Measures
Self-combustion	Y	Potential for scrap metal to be contaminated with combustible material e.g. oils, paints, grease etc.	Scrap metal is purchased to particular grades that should be free from such contaminants. Upon arrival at site the scrap is inspected for cleanliness and rejected if it is deemed heavily contaminated.
Incompatible wastes	X	Only scrap metal is stored onsite.	Separation of material not required as all scrap receipts will be processed in the same way.
Arson	X	The site has 24-hour manned security entrance and the site has CCTV in place.	Site security and CCTV.
Plant or equipment failure	Y	Electrical failure from mobile plant could present sparking risk. Spills from failure of machinery hydraulics might provide fuel.	Mobile plant is regularly inspected and maintained to prevent electrical failure. Spill kits are available on site to contain and clean up any spillages.
Electrical faults or damaged/exposed electrical cables	X	Regular inspections of all electrical equipment will prevent faults going unnoticed.	Prevent use of electrical equipment where defaults are found at any time or during an inspection.
Naked lights	X	All light fixtures that may be heat sources are raised on posts high above ground level.	No further controls required
Smoking	X	The site is designated a NO SMOKING area.	A designated smoking area is located offsite and is supplied with a suitable receptacle for discarded smoking materials.
Sparks from loading buckets	X	Loading buckets are not used on site	No further controls required
Hot works e.g. cutting	X	-	Not to be undertaken in this area.

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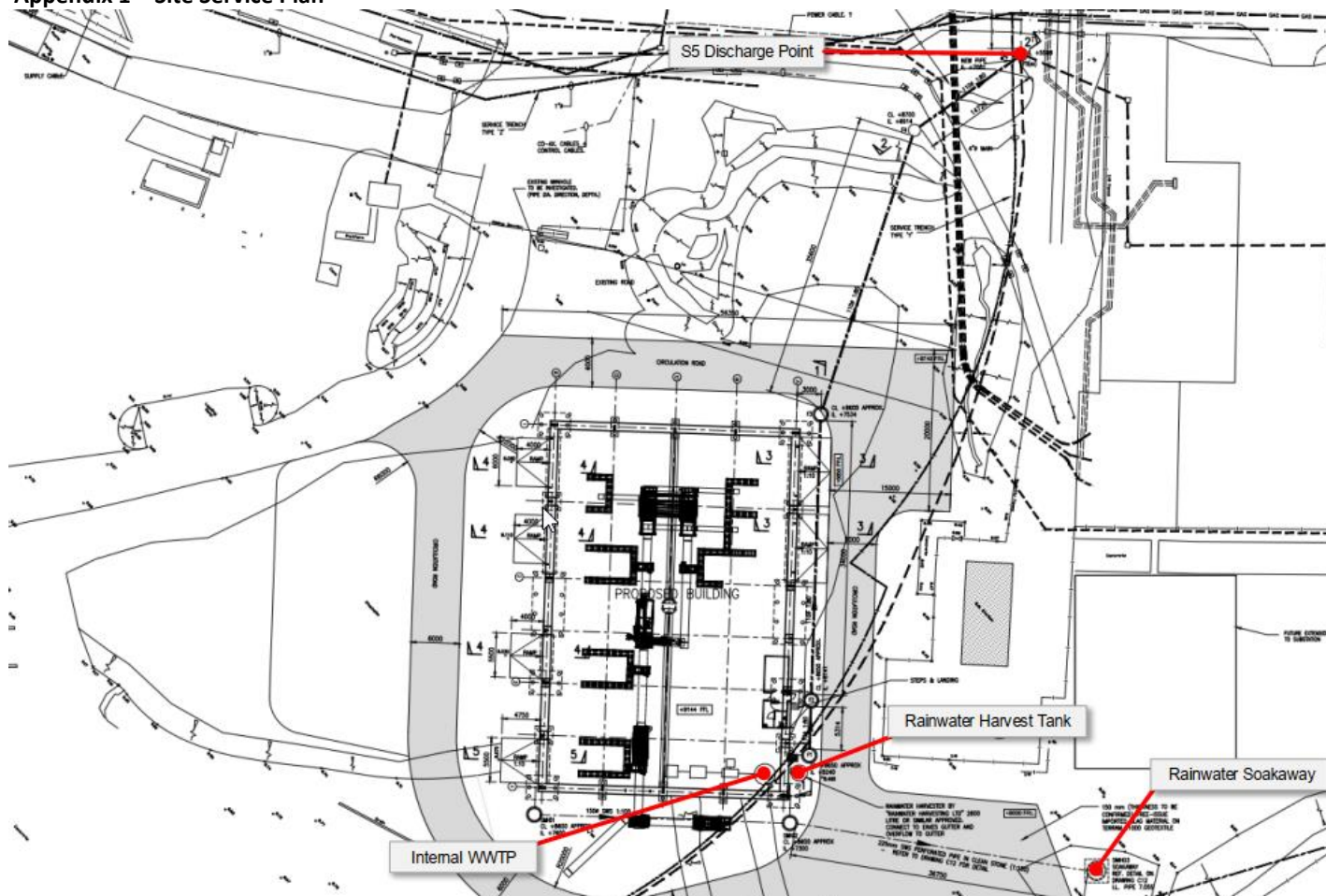
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Possible Cause	Applicable	Reason	Control Measures
Hot exhausts	Y	Mobile equipment can ignite material trapped near their exhausts	Operatives to be instructed to clear material from around exhausts at end of each shift; this will be included in induction training, relative procedures and routine inspections.
Industrial heaters	X	No industrial heaters on site	No further controls required
Open burning onsite	X	No open burning permitted on site	No further controls required
Weather, e.g. lightning strikes	Y	Naturally occurring lightning strikes could be a source of ignition	If weather is deemed hazardous site operations will be ceased until such time that it is deemed safe to return to operations.

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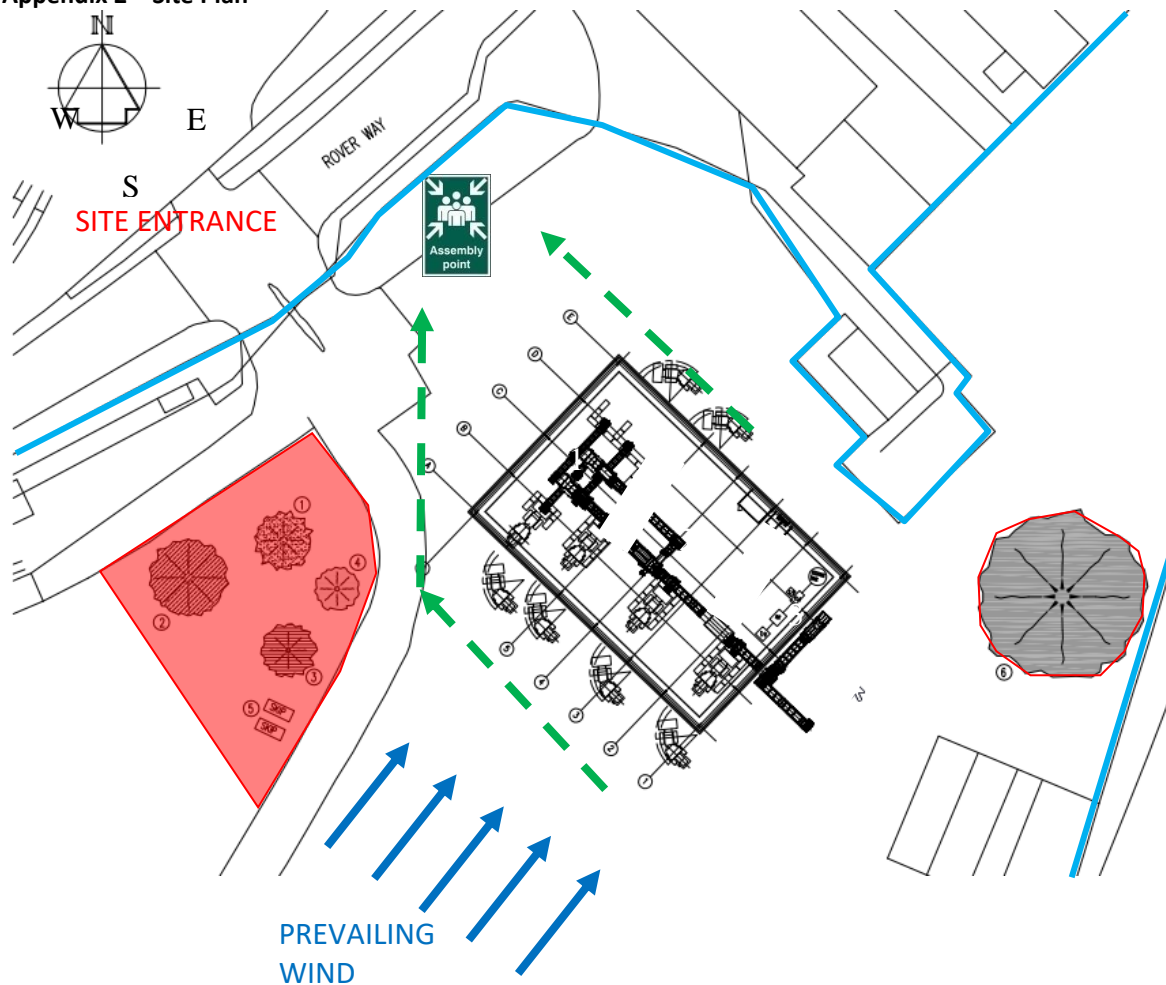
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Appendix 2 – Site Plan



LEGEND

- DENOTES SITE OWNERSHIP
AREA = 150,669m² (15.07ha)
- STOCKPILES OUT**
- ① UNDERSIZE
 - ② STONE AND STAINLESS
 - ③ WOOD/PLASTIC
 - ④ FERROUS
 - ⑤ NON FERROUS
 - SKIP

KEY

- = Exit Route
- = Assembly Point
- = Site Boundary
- = Quarantine Area
- = Unprocessed Waste Pile
- = Processed Waste Piles
- = Clear Area

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Appendix 3 – Human Receptors



Hospitals
No hospitals within 1-km of the Site. The closest is Cardiff Royal Infirmary 2.1-km northwest.


Nursing homes
No nursing homes within 1-km of the Site. The closest is St Albans care Home 1.3-km northwest.

Schools
Four schools within 1-km of the Site. Willows High school is 320 m northwest.

Residential areas
Multiple residential areas associated with the Splott and Tremorfa areas.

Places of work
Multiple businesses located within 1-km of the Site.

Transport networks
Main access point via Rover Way.

TITLE Figure A6. Human Receptors (within 1-km of the Site)	JOB REFERENCE: 018-1620 DATE: October 1, 2018	REVISIONS:		
		No.	Date	Description
		00	09/10/18	Final for report
		-	-	-
		-	-	-
CLIENT: Celsa Manufacturing (UK) Ltd	SCALE: As stated	DRAWN BY: MJS	CHECKED BY: SPR	
				



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