

# Fire Prevention & Mitigation Plan

Thomas Recovery Services (TRS)



May 2019

# **Fire Prevention & Mitigation Plan**

**Plot 12a Waterston Industrial Estate, Waterston,  
Milford Haven, Pembrokeshire SA73 1DP**

**TRS Recycling**

**May 2019**

**Schedule of Document Revisions**

This Fire Prevention & Mitigation Plan is a live document which, consequently, requires periodic revision, the Schedule of Revisions below will be updated and reissued with each revision, to ensure that the reader has a reference advising him/her that the section they are referring to is the most up to date.

Section	Revision No.	Nature of Amendments	Date of Issue
	1.0	Initial Issue	September 2017
All	1.1	Re-written	May 2019

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**SITE INFORMATION & KEY CONTACTS LIST**

<b>SITE DETAILS</b>			
Location:	Unit 12a Waterston Industrial Estate, Waterston, Milford Haven		
Postcode:	SA73 1DP		
Site Access Grid Reference:	SM 93267 06037		
<b>SITE CONTACTS</b>	<b>Name</b>	<b>Office Hours</b>	<b>Out of hours</b>
Owner:	Phillip Thomas	07831 240303	07831 240303
Owner:	Steven Thomas	07775 592255	07775 592255
Main Office:		01646 690074	
<b>EMERGENCY SERVICES</b>		<b>Office Hours</b>	<b>Out of hours</b>
Emergency		999	999
Medical:		01646 690674	0845 46 47
Police:		101	101
Fire:		03706 060699	
<b>REGULATORS</b>		<b>Office Hours</b>	<b>Out of hours</b>
Health and Safety Executive (HSE)		0345 300 9923	0151 922 9235
Local Authority:		01437 771891	0845 601 5522
Natural Resources Wales (NRW) (24 hr)		0300 065 3000	0300 065 3000
<b>UTILITY / KEY SERVICES</b>	<b>Name</b>	<b>Office Hours</b>	<b>Out of hours</b>
Water undertaker:	Welsh Water	0800 520 130	0800 520 130
Sewerage undertaker:			
Welding Gas supplier:	A.C. Davies	01646 693248	07970 544121
Electricity distributor:	Western Power	0800 052 0400	0800 052 0400
Electricity supplier:	SSE	0345 026 2658	105
Oil supplier:	West Wales Lubricants	01267 222064	
Fuel supplier:	K.P. Thomas	0834 861 438	
Chemical supplier:			
Oil spill contractor:	Braemar Howells	020 3142 4464	020 3142 4464
Maintenance contractor:			
Electrician:			
Plumber:			
Locksmith:			
Joiner:			
<b>OTHER KEY CONTACTS</b>	<b>Name</b>	<b>Office Hours</b>	<b>Out of hours</b>
Adjacent landowners:			
Estate Neighbours:			

## 1 INTRODUCTION

### 1.1 Fire Prevention Aims & Objectives

This Fire Prevention & Mitigation Plan has been prepared in order to meet the following objectives:

- Minimise the likelihood fire;
- Extinguish any incident within hours;
- Minimise the spread of fire within the site, to surrounding areas & neighbouring sites.

Site staff and contractors will be made aware and understand the contents of the Fire Prevention & Mitigation Plan (FPMP) and what they must do during a fire, this document will be kept in the site office.

### 1.2 Site Information

This plan considers the risks associated with fire on site at Plot 12a, Waterston Industrial Estate, Waterston, Milford Haven, Pembrokeshire, SA73 1DP. The site is operated according to the following activities:

- Vehicle storage, depollution & dismantling (Authorised Treatment Facility, ATF), with a maximum throughput of 5,000 tonnes per annum (20 Tonnes per day).
- Metal recycling site, with a maximum throughput of 25,000 tonnes per annum (100 Tonnes per day).
- Waste electrical or electronic equipment (WEEE), with a maximum storage capacity of 400m<sup>3</sup> at any one time.

In addition to this document the site is operated in accordance with an Environmental Management System (EMS); details on acceptance, storage, treatment and removal of all wastes handled on site, are also made in Section 3 of the EMS. The main operations that take place on site are as follows:

- Compacting (by loading shovel/360° excavator);
- Sorting (with loading shovel/360° excavator or by hand);
- Magnetic separation of ferrous metals;
- Depollution of waste motor vehicles;
- Metal recycling (sorting, separation, grading, shearing, baling, compacting, granulating of cables, and cutting using hand-held equipment only, of ferrous metals or alloys and non-ferrous metals into different components for recovery);
- WEEE Storage & reloading.

The layout of the site is shown on the 'Site Layout & Fire Plan', which appears in Appendix I of this document.

### 1.3 Staffing & Management

The table below details the staff structure when the site is operational, showing the minimum number of staff available to tackle a fire on site during operational hours. Only the site management, machine/plant operators and general operatives will be permitted to tackle fires on-site.

<b>Table 1.0 Staffing</b>		
<b>Position</b>	<b>Employees</b>	<b>Responsibilities</b>
Site Manager	1	Overseeing and co-ordinating all site activities.
Technically Competent Manager (TCM)	1	Ensure the site operates in accordance with the Environmental Permit and associated regulations.
Administrative Staff	1	Office/administrative duties.
Machine/Plant Operator Site Operative	2	Waste handling/processing, reception and plant operation.

The site shares resources with other businesses on neighbouring sites that are also within the Thomas Brothers business group.

### 1.4 Plant & Equipment

The table below details the plant/equipment on site.

<b>Table 1.1 Plant &amp; Equipment</b>		
<b>Item</b>	<b>Number</b>	<b>Function</b>
360° Excavator	1	Loading/unloading/movement/sorting
Forklift Truck	1	Loading/unloading/movement/sorting
Depollution Rig	1	Depollution & dismantling of vehicles
Shearer	2	Size reduction
Storage Containers	2	Storage of vehicle parts for recycling

*N.B. Plant and equipment numbers on site may vary due to circumstances.*

Maintenance of plant and equipment on site is described in Section 2.5 of this document.

### 1.5 Fire & Rescue Service

The Fire Rescue Service has made site visits and expressed satisfaction regarding the current layout, infrastructure and storage volumes of the site. Contact will be maintained with the Fire Service over the passage of time to ensure they're continued satisfaction with the site and that all measures to prevent, mitigate and contain fires are up to date and deemed sufficient.

## 1.6 Sensitive Receptors

As part of the commitment to minimise the impact on the local area and associated receptors from a fire on site, this document details mitigation measures which will decrease the likelihood of a fire occurring on site and limit the size and duration should it occur, as per Section 1.1 above, a ‘Sensitive Receptors Plan’ has been provided in Appendix I to highlight all main receptors within 1,000m of the site.

The primary sensitive receptors for any fire event would be the site itself, staff and any site users and beyond the site is the immediate industrial estate and the businesses that dwell there. The site is located in the North-eastern corner of Waterston Industrial Estate, it is bordered by a Waste Transfer Station to the North and North-west and a caravan storage site to the South. The surrounding land beyond the industrial estate is agricultural apart from the railway line, which abuts the site to the east. The nearest housing is Waterston Village 300 meters to the east and beyond the B4325 Main Road, some 250 meters to the South, lies the Valero oil storage tank farm. Table 1.2 below identifies the key populated receptors in the area surrounding the site.

Table 1.2 Key Populated Receptors		
Receptor	Contact Information	Directions & Distance from Site
Neighbouring Businesses on Waterston Industrial Estate	No specific point of contact. TRS personnel will knock on doors of immediately adjacent properties as required.	Neighbouring units are to the North, South & East of Plot 12a, less than 100m from the Site.
Residential areas, shops, food outlets, tourism facilities and public open spaces.	No specific point of contact. TRS personnel will knock on doors of immediately adjacent properties as required.	Waterston Village is 300m to the East Rosemarket Village is 2.6 km to the North-east. Neyland town is 2.7 km to the East. Milford Haven is 1.7 km to the West.

Table 1.3 below identifies the Critical Infrastructure within and beyond a 1km radius of the site.

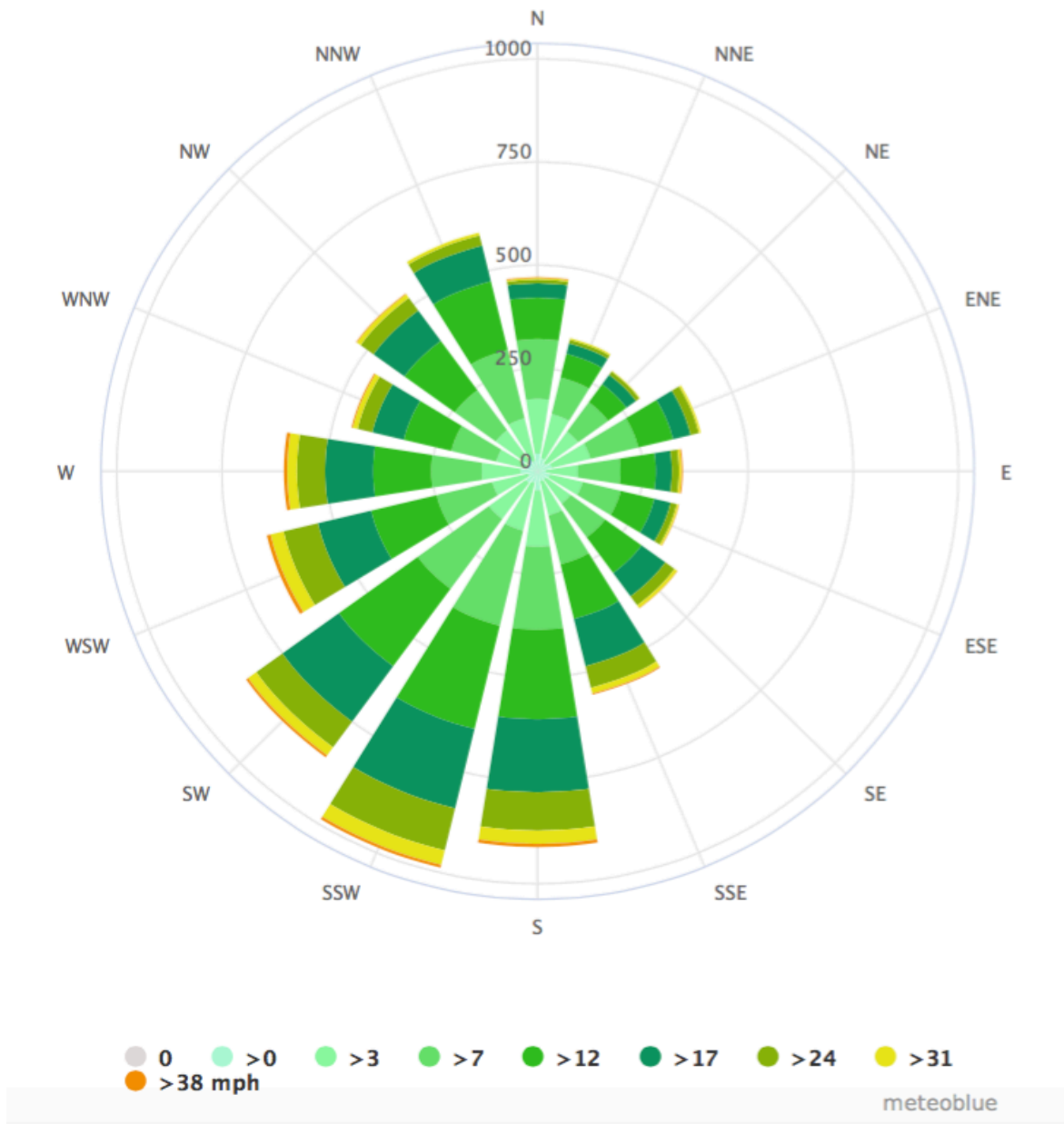
Table 1.3 Critical Infrastructure		
Receptor	Distance & Directions from Site	
Valero Oil Storage Facility	250m to the South.	< 1km
Pembroke Power Station	3.4 km to the South.	>1km
Valero Oil Refinery	3.4 km to the South-west.	>1km
Pembroke Dock	3.3 km to the South-east.	>1km

Table 1.4 below identifies Key Environmental Receptors within a 1km radius of the site.

Table 1.4 Key Environmental Receptors		
Receptor	Distance & Directions from Site	
Principal Aquifer underlying the site and its groundwater regime.	Underneath site.	< 1km
A tributary stream in woodland across the field.	100m to the North.	<1km
A tributary stream in woodland across the railway track.	100m to the East.	<1km

The Wind Rose diagram below in Figure 1.0, represents the annual wind direction distribution for Milford Haven for 2018; the prevailing wind direction is notably from the South-west which, more often than not, suggests that winds travelling over the site will pass by Waterston Village, to its North-west, and over agricultural land until they eventually arrive at Rosemarket Village, some 2.6km away.

Figure 1.0 Milford Haven Annual Wind Direction Distribution.



## 2 FIRE: CAUSES, SOURCES, RISKS & MITIGATION

### 2.1 Common Causes

The table below considers the common causes of fire, examples of their sources and the associated risks and mitigation measures necessary to manage them:

<b>Table 1.5 Fire: Common Causes, Risks &amp; Mitigation</b>		
<b>Source</b>	<b>Risk</b>	<b>Mitigation</b>
Arson or Vandalism	Deliberate ignition of wastes by intruder(s) and/or vandalism of the site infrastructure, plant and/or machinery, which may give rise to malfunction or compromise the integrity of waste storage/containment measures.	Site security measures are detailed in Section 2.7.
Visitors & Contractors	Limited awareness of the site rules, operations and layout could pose a fire risk.	All visitors and contractors are required to acknowledge their understanding of the site's safety rules and code of conduct.
Plant or Equipment	e.g. spillages of fuel, sparks from machinery or malfunction caused by poor maintenance.	All items of plant are subject to a preventative maintenance regime and stored 6m away from combustible materials when the site is closed; see Sections 2.5 & 2.6. Fuel & Oils are stored in neighbouring Plot 10 site.
Electrical appliances and cabling	Faulty appliances or damaged/ exposed electrical cables may spark as a result of a power surge.	All electrical equipment is serviced and maintained by a suitably qualified electrician on an annual basis.
Discarded smoking materials	Risk of ignition of stored wastes from smoking materials that have not been fully extinguished.	The site has a strict no smoking policy and a designated smoking area is provided at the entrance to Plot 10 next door, as detailed on the 'Site Layout & Fire Plan'.
Open burning on site or on adjacent sites	Risk of ignition from heat radiation or flames from open burning on site or on adjacent sites.	There is no open burning on site, all staff are suitably trained and checks undertaken periodically throughout the working day.
Overheating of stored waste	Sources of heat may include hydraulic pipes, hot exhausts, light bulbs, space heaters and direct sunlight.	Stored wastes will be visual inspected throughout the day and turned as necessary to prevent the formation of 'hot spots'.
Fireworks/Chinese lanterns	Ignition of stored wastes from either of these two sources	All stockpiles of combustible wastes are within the limits shown in the NRW's FPMP guidance; on site fire-fighting equipment can be used to reduce the spread of fire. All containers containing combustible wastes are individually accessible should an incident of this nature occur

Source	Risk	Mitigation
Sparks from loading buckets/shovels	Scraping of loading buckets/shovels causing sparks which may ignite stored wastes.	Fire extinguishers are fitted in the cab of all loading plant.
Hot works	e.g. welding, soldering, cutting, etc. which involve the use of high temperature equipment which may be a source of both primary and residual heat to stored wastes.	All hot works, including welding/cutting, etc., are to be carried out within the 'Hot Works Area' as defined on the 'Site Layout and Fire Plan', which is located at a minimum of 6 metres from any stored wastes. The site's hot works procedure is provided in Section 2.3 Below.
Industrial heating	Industrial heaters and/or pipe-work used to heat internal and external areas on site that may, in turn, supply heat to stored wastes increasing the risk of combustion.	There are no industrial heaters (or associated pipe-work) used at the site.
Hot exhausts	Potential source of both primary and residual heat to stored wastes.	Daily fire watch and the preventative maintenance ensure the risk is minimised.
Loose material build up around plant/machinery and exhausts	Light waste and ambient particulates with high combustibility settling and building up in key areas in and around plant/machinery and around exhausts.	Plant/equipment is monitored daily as per the checklist and cleaned as necessary; site staff will also monitor and keep the areas around plant and equipment clear of debris.
Housekeeping	Accumulations of dust, debris, fluff etc, in and around the site.	Any accumulations shall be cleaned immediately; attention shall be made to accumulations near sources of ignition such as dust/fluff build up on or around electrical equipment etc.
Hot loads	Imported wastes that may contain materials that are above ambient temperature.	All loads are inspected in accordance with the waste acceptance procedures, should such loads arrive at site they will be intercepted by site operatives who will reject the load. If required the load may be directed to the quarantine area to ensure the material does not pose a concern/fire risk. The material will if required be treated to ensure the risk of fire is completely removed.
Overhead power lines	Any overhead power lines on or around the site may ignite in the event of a fire and worsen the effects.	There are no overhead power lines that traverse the site.
Batteries within deposits & ELV's	Careless handling of batteries can easily cause electrical fires.	Batteries are disconnected within ELVs upon receipt and removed as soon as possible; they are carefully stored in sealed plastic battery boxes. Should unexpected batteries arrive within scrap loads, extraction and careful storage is a high priority.

## 2.2 Fuel Storage

Fuel, oil and other fluids for the maintenance and operation of site heavy plant are stored in the neighbouring Plot 10, however, waste fuel, oil and other fluids stored on site are shown on the 'Site Layout & Fire Plan'. Procedures for fuel storage on site are as follows:

- Tanks are surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipe-work and associated infrastructure will be enclosed within the bund.
- All valves and gauges on the bund will be constructed to prevent damage caused by frost.
- The tank will be clearly marked showing the product within and also its capacity.
- No combustible waste will be stored within six metres of the tank.

## 2.3 Hot Works

Hot works carried out on site, i.e. welding/cutting/etc., will be solely undertaken in the 'Hot Works Area' as shown on the 'Site Layout and Fire Plan', the following procedures apply:

- Establish hot works are required when alternatives, e.g. drill and bolt etc. are not applicable.
- All hot works must be carried out in the 'Hot Works Area' as shown on the 'Site Layout & Fire Plan' due to its significant stand-off from other stored materials/wastes on site, i.e. six metres.
- Ensure the area is cleared of all flammables.
- Ensure you have TWO fire extinguishers are to hand. The type would depend on your working environment but generally a CO<sub>2</sub> and a Powder extinguisher would be suitable.
- Ensure you have used screens to shield bystanders from sparks and welding flash.
- Ensure you have an observer to watch over you while you work, e.g. during cutting/welding, your observer should remain with you at all times and be constantly checking the area for sparks or signs of fire.
- When the work is complete again check for fire and if all looks OK, note the time the hot work finished.

## 2.4 Site Smoking Policy

Smoking is prohibited in all waste management and storage areas; employees who wish to smoke may do so in their own time during lunch breaks. Employees will not be permitted to smoke whilst carrying out their duties, SMOKING IS ONLY PERMITTED IN THE DESIGNATED SMOKING AREA as shown on the 'Site Layout & Fire Plan', which is located at the entrance to Plot 10 next door at safe distance from any potential fire risks or other flammable materials/wastes. Non-compliance with the site policy by site staff or visitors will attract disciplinary proceedings and/or removal from site.

## 2.5 Plant & Equipment

External separation distances of six meters will be observed between plant and stored material when the site is not staffed. All plant will be powered-down and completely shut off prior to cessation of operations on any given day, any plant which is not in use for any extended period will also be stored at least six metres from any stored combustible wastes.

All Plant will contain fire-fighting equipment in the cab in addition to measures around the operational area, mufflers will be fitted onto hot exhausts, where possible, to ensure the source of ignition from plant/equipment is reduced to a minimum.

Dust from processing/treatment operations on site can settle at the end of daily operations onto hot exhausts and engine parts, therefore, a fire-watch will be implemented after cessation of works. Any build of dust/fluff on plant or equipment will be removed and comments noted in the 'Site Diary' or the 'Site Inspection Report' as shown in Appendix II.

## 2.6 Preventative Maintenance

All items of plant and equipment listed in Section 1.4, and any additional items of plant which may be hired in to cover busier periods, are subject to preventative maintenance checks to ensure their safe operation and to reduce faults and/or malfunctions. The 'Preventative Maintenance Checklist' is shown in Appendix II.

All plant and equipment on site and all vehicles in the fleet are subject to regular maintenance to ensure optimum working order, additional preventative maintenance checks on a more frequent, but less formal basis i.e. daily, before, during and at the end of each working day to ensure, where possible, the machinery is mechanically sound will also be undertaken. In the event of any problems requiring attention the 'Preventative Maintenance Checklist' will be used in conjunction with the 'Site Diary'.

## 2.7 Site Security

The site access gates are of steel palisade construction to a height of 2.4 meters and are lockable should the site be left unmanned at any time, to prevent unauthorised vehicular or pedestrian access.

As detailed in the site's EMS, the neighbouring yard, Victoria Depositary, which extends beyond the permit boundary, is also entirely surrounded by a mixture of security fencing, i.e. palisade and chain-link. The site access road also benefits from 24-hour CCTV coverage.

The site security measures (fencing/gates) will be inspected on a daily basis, should any defects that impair the effectiveness of security occur, repairs to the same or better standard would be undertaken within 7 working days. All repairs will be noted on the 'Site Diary' within 24 hours of the event and the 'Preventative Maintenance Checklist' provides further information.

Should unauthorised access become a problem at the site, security measures will be reviewed and improvements implemented.

## **2.8 Electrical Faults**

All electrical cabling, distribution equipment, motors, machinery and other fixed site equipment will be visually inspected periodically as part of the preventative maintenance program, any damaged cables, equipment and appliances will be repaired as soon as practicable.

Armoured cables have been installed wherever possible to reduce the impact of mechanical interference on cable integrity, over-current protection and where applicable residual current devices (RCD's) have been installed on final circuits to protect staff, appliances, equipment and cabling from the risk of electric shock and fire.

Fire fighting equipment, suitable for electrical fires, is available in multiple locations throughout the waste processing area.

### 3 SELF-COMBUSTION PREVENTION

#### 3.1 Storage Time Control & Monitoring

The ethos behind daily operations, management and layout of the site with regard to reception, storage and removal of waste is to follow a 'first in, first out' principle where incoming waste is sorted processed and stored pending its export off-site as soon as practicable. The key to managing the site efficiently is to minimise over-stocking, which in-turn reduces the risk of overheating and spontaneous combustion (albeit that this only applies to a limited number wastes handled at the site). Therefore, the maximum storage capacities of all wastes on site are defined in the 'Waste Storage Details' table in Appendix II, these figures are calculated in line with the NRW's guidance document.

All combustible wastes are managed to ensure that they are stored for no longer than three months as the intention is to remove as soon as practically possible, i.e. waste materials such as scrap and WEEE are removed when sufficient quantity/volume has been stocked to produce a full load.

#### 3.2 Temperature Control & Monitoring

All loads will be visually inspected before and after deposit to identify the potential for hot loads, should any loads be identified as being 'hot', then the rejected load procedures will be followed.

Whilst there are other forms of combustible waste stored at the site, these will have been sorted and stored as described in subsequent sections of this document to await removal and have very little chance of combusting other than arson or staff negligence; both of which are addressed.

As a general rule waste materials entering the site are processed and exported from site with a reasonably quick turn around, well within the three-month maximum storage time. However, should a situation ever arise where combustible materials require storage for more than the three-month limit, TRS will invest in a thermal imaging camera to conduct temperature monitoring on a daily basis by a trained employee/fire marshal noting time and upper and lower temperatures recorded by the thermal imaging camera. Any relevant comments regarding the stored, e.g. physical condition, steam etc., and/or actions taken, will also be noted.

#### 3.3 Waste Acceptance

Strict waste acceptance procedures are in place on site and detailed in EMS, when waste is accepted, records are produced that can be used to determine how long waste has been on site and how long other separated wastes are stored prior to removal from the site. This will ensure compliance with the maximum storage duration for specific wastes, as shown on the 'Waste Storage Details' table.

The following details will be recorded for every load deposited at the site:

- The date and time of delivery.
- The name and address of the waste producer.
- The detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
- How the waste is contained e.g. loose, container type.
- The carrier's name and address.
- Driver's name, signature and vehicle Registration N<sup>o</sup>.
- Signature or initials of person(s) producing/accepting/inspecting/ carrying the waste.
- Additional handling details/notes made by the driver after inspection of the load.
- SIC code of the premises that produced the waste (where relevant).
- Waste hierarchy declaration.
- Information on previous treatment of the waste e.g. manual or mechanical.

Any wastes identified during the incoming waste inspections that do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site. The NRW will be contacted, where necessary, should the non- conforming waste discovered be likely to lead to a breach of permit conditions.

## 4 STORAGE OF WASTE

### 4.1 Combustible Waste Storage

The site building has three walls with an open front and a pitched roof, the walls were constructed from concrete with steel reinforcement to a thickness of 200mm and a height of five meters, above that height to the roof the walls are box profile corrugated sheets.

The concrete walls are sufficient to accommodate stockpiles of a maximum height of four meters whilst providing an ideal fire barrier preventing flames or sparks escaping, concrete is a non-combustible material and has a slow rate of heat transfer thus providing a shielding effect from heat, it also enables natural cooling. The building is monitored for damage and repaired as needed as part of the preventative maintenance regime.

The 'Waste Storage Details' table highlights how all combustible wastes will be stored in line with the NRW's FPMP guidance; this includes specific comments, stock rotation and management techniques specific to each stockpile. Wherever possible waste materials will be stored in their largest form and stockpile sizes kept to a minimum.

### 4.2 Solid Waste Storage

Undepolluted ELV's are delivered via a recovery vehicle and stored in a storage area, as shown on 'Site Layout & Fire Plan', each ELV stored will be accessible from at least one side or from above.

Once ready for the depollution process, the undepolluted ELV will be taken directly into the building and put on the depollution rig as shown on 'Site Layout & Fire Plan'. The depollution area has been designed to contain any spillages from the depollution process and there are spill kits and absorbents on hand to ensure that any leaks are cleaned up immediately.

A suitably trained employee will carry out the depollution process to ensure it is undertaken correctly and that only fully depolluted ELV's enter the depolluted storage area. These measures ensure the risk of leaking fuels and combustible liquids trailing to other areas of the external concreted area are reduced to a minimum.

The rest of the scrap metal accepted on site is stored in a stockpile located outside the building on the concrete at the easterly side of the site.

### 4.3 Fluid Waste Storage

Drained fluids from the ELV process are stored in dedicated tanks housed within a converted curtain sided truck body that is situated on concrete outside the building, adjacent to the southern wall of the vehicle maintenance workshop section of the building, as shown on the 'Site Layout & Fire Plan'. When full, the storage tanks are emptied by an approved contractor for recovery/disposal at a suitably permitted

facility. The tanks are fully sealed and surrounded by a bund capable of containing a minimum of 110% of the volume of fluids, all pipe-work and associated infrastructure is enclosed within the bund and each tank is clearly marked showing the product within and also its capacity.

#### **4.4 Waste Tyre Storage**

Tyres from the ELV depollution process are stored using up to three containers as shown on the 'Site Layout & Fire Plan'; when full, the tyres will be removed from site for recovery at a suitably permitted facility.

#### **4.5 Waste Stored in Containers**

There are a number of containers and skips used for the storage of waste, i.e. 12yd<sup>3</sup> - 40yd<sup>3</sup> skips, these skips and containers are used for the storage of separated wastes such as vehicle engines, batteries, cable, alloy wheel rims and catalytic converters etc. The containers are removed from site once full and are replaced by an empty container; in general no waste is stored in a container/skip for longer than two months.

Clear access to skips and containers will be maintained at all times, should they require quick removal in an emergency fire situation to the quarantine area. If the container should be subject to fire or any materials within a container, then given the health and safety risk and potential risk of fire spreading, the operator reserves the right not to attempt a move of a container full of waste when significantly ablaze.

All waste stored in containers has been subject to rigorous mechanical sorting and the waste types stored have a very low chance of self-combustion; the only risk of waste in containers igniting would be during operational hours i.e. staff negligence or arson when the site is open. Appropriate measures have been implemented to ensure this risk of a container fire is minimised and extinguished efficiently.

## 5 FIRE SPREAD PREVENTION

### 5.1 Fire Breaks & Storage of Waste

Combustible waste will be stored as per the 'Site Layout & Fire Plan' and reference should be made to the 'Waste Storage Details' table, to ensure the waste is stored within the guidelines of the NRW's FPMP guidance. The intention is to store waste materials in their largest form and minimise stockpile sizes wherever possible. Sufficient gaps and fire breaks between storage areas can be seen on the 'Site Layout & Fire Plan'.

### 5.2 Fire Walls & Bays

The building walls are constructed from shuttered concrete of a minimum 200mm thick to a height of five meters, these walls will:

- Resist fire from both heat radiation and flames; and,
- Have a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within a matter of hours.

### 5.3 Fire Fighting

Fire fighting methods for burning solid waste include smothering the waste, separating burning material from other waste and/or spraying with water. TRS has laid out the storage areas to reduce the risk of fire spreading by maintaining 'free air' fire breaks and ensuring good access for emergency vehicles. Site Supervision or available staff may attempt to extinguish a fire using the correct extinguisher or the on-site fire water if:

- It is safe to do so.
- It is a small fire that can be managed by the on-site staff.
- Staff and visitors have been moved from the danger area and an evacuation has commenced.
- The Fire Service has been called.
- The person using the extinguisher or fire appliance has been trained in their use.

If a fire occurs on a vehicle or piece of equipment, the equipment operator will bring the vehicle or equipment to a safe stop. If safe to do so, the vehicle will be parked away from fuel supplies, uncovered solid wastes, and other vehicles. The engine will be shut off and the brake engaged to prevent movement of the vehicle or piece of equipment whilst the fire is dealt with.

## 6 QUARANTINE AREA

### 6.1 Quarantine Area Location

In accordance with the NRW's guidance a quarantine area has been designated as shown on the 'Site Layout & Fire Plan', this area is accessible at all times. The site also benefits from a six meter buffer boundary around the area's perimeter giving other waste or materials stored on site an element of protection.

In the event of a fire, the quarantine area will be used to either isolate wastes which are smouldering, allowing safe dissipation of heat without exposing other areas on site to the risk of ignition, or to remove any wastes stored in bays/stockpile/containers near any material affected by a fire to prevent fire spreading to adjacent stockpiles. Waste will be moved to the quarantine area immediately or as soon as safe to do so using loading shovels from the site next door and/or the sites own excavator.

### 6.2 Quarantine Area Size & Volume

The quarantine area measures approximately 35m<sup>2</sup> and if waste were stored to a height of 4m it could hold a volume of approximately 140m<sup>3</sup>, which is more than the required 50% of the maximum pile size for combustible waste on site (largest stockpile is 140m<sup>3</sup>).

## 7 DETECTING FIRES

### 7.1 Site Inspection

Daily inspections of all site areas will be undertaken and recorded on the 'Site Inspection Form' shown in Appendix II, the inspections will be conducted by personnel who are familiar with the requirements of the EMS, EP and this document. This will monitor and curb the levels of dust, fibre, paper and other loose combustible materials that could aid the acceleration of a fire on site. Additionally employees are encouraged to monitor the site for smoke and steam emanating from stockpiles or storage containers, this is part of a 'fire watch' initiative during their daily activities to achieve early identification and rapid response.

### 7.2 Staff Training

An understanding of the procedures outlined in this FPMP document will be required as part of the site induction for all new staff and any existing staff who are not familiar with the document. This includes knowledge of what's required should a fire break-out and more importantly how to undertake their work in a way that minimises the risk of a fire occurring, also how to raise the fire alarm and to use the extinguishing equipment, should a fire be small enough to tackle.

A full test (drill) of the procedures in this document i.e. to test that the plan works, will be carried out every six months. The first test will take place within one month of the agreement of this document with the NRW. The outcome and any follow up training for staff will be documented in the site diary and relevant forms in the EMS, the 'Site Inspection Form' in Appendix II will also be used during the drills.

Ongoing training will also be provided to ensure site staff are informed of any changes to any of the site management documentation subject to regular review. All staff will review the requirements of this FPMP periodically to ensure knowledge the procedures in the event of a fire.

### 7.3 Fire Detection

If a fire is detected or suspected by a member of staff, it must be immediately reported to the Site Manager and/or the Technically Competent Person (TCP), the Site Manager will then conduct the following procedure:

- Raise the fire alarm, if not already done by another staff member.
- Initiate evacuation of staff and visitors on site to the meeting point and instruct delegated personnel to conduct a 'roll call' to ensure all site users are accounted for.
- Assess the intensity and scale of the fire and make a judgment as to whether the fire can be managed without the requirement for assistance from the emergency services, i.e. using the hose or fire extinguishers.

- If viable and safe, instruct necessary site staff to commence extinguishment.

A fire alarm utilising heat sensors is currently under consideration with a view to its installation within the building used for waste storage, limiting the potential of fires starting and advancing un-noticed.

## 8 FIRE SUPPRESSION

### 8.1 General

Site personnel are trained to deal with small fires that can be extinguished with fire extinguishers; anything beyond the site capabilities will be referred to the Fire Rescue Service will deal with. TRS will provide the Fire Rescue Service with all of the support they require including heavy plant to move waste and trained personnel who would work under their direction. Additional resources can be made available should they be required.

The NRW's FPMP guidance mentions the site should have enough water available for fire fighting to take place and to manage a worst-case scenario. A worst-case scenario would be the largest waste pile catching fire, and this scenario could potentially represent a waste pile (scrap metal) measuring 140m<sup>3</sup>, when at full capacity. This would require approximately 1,000 litres/min for 3 hours, which equates to approximately 168m<sup>3</sup> in total.

There are no natural or man made water features in close proximity that may lend themselves to assist in the provision of significant quantities of water to fight fire, therefore, the main source of water volume relies upon the water hydrants situated within the industrial estate, as highlighted on the 'Emergency Services Access Plan' in Appendix I.

### 8.2 Building Suppression Systems

The mains water pressure is known to be relatively low in the area due to the numerous leaks in the service providers network, therefore, TRS Recycling are preparing, at the point of submission of this FPMP, to design and install a rainwater harvesting system from the roof in order to stock enough water at a sufficient height to combat fire outbreak through a sprinkler system under the roof. The suppression system, when installed, will provide nozzle/sprinkler coverage of the inside area of the building.

### 8.3 Fire Hydrants

Two fire hydrants have been identified within 150 metres of the site it is assumed that the water main, servicing the site, is approximately a diameter 200mm with a maximum flow rate of 1000l/min. The locations of the nearest hydrants are shown on the 'Emergency Services Access Plan'.

### 8.4 Additional Resources

There are a number of fire extinguishers located around the site that can be deployed in the event of a smaller fire incident for fire suppression, each fire extinguisher is fully charged and ready for use at all times, all extinguishers are inspected annually by a qualified service company. The locations of the extinguishers are shown on the 'Site Layout & Fire Plan' in Appendix I.

The following types of fire extinguisher are available:

- Dry Powder
- Foam

All operating plant that is used to handle the waste is also fitted with fire extinguishers that can be used to suppress small fires should the operator or staff notice them.

As well as using on site fire fighting equipment, i.e. extinguishers, there will be up to 50m<sup>3</sup> of non-combustible inert soil / hardcore material, stored in Plot 10, which could be used to smother a fire using a loading shovel from the same site within 5-10 minutes of a fire breaking out. Utilising 'dry' fire fighting techniques will reduce the need for water when tackling a fire, which would also reduce the volume of potentially polluting and hazardous fire fighting residues requiring disposal following an incident.

## 9 FIRE RESPONSE

### 9.1 Emergency Services Access

The site has direct access from the B4325 Main Road via the industrial estate service road; this provides easy access for the emergency services. The width of the approach road and the gateway provide sufficient access onto the site for the Fire Service. Access routes for emergency services around the site and water supply hydrants are clearly shown on the 'Emergency Services Access Plan'.

### 9.2 Fire Response Procedures

Further to the above measures, the following procedure would apply:

- Upon discovering smoke or fire, raise the alarm via a call to the Site Manager or Office, or by repeated horn blasts and/or shouting to indicate a fire has been discovered.
- Call the Fire Service via 999 and the NRW's Emergency Contact Number.
- Prior to the Fire Service arriving, inform all neighbouring premises likely to be affected.
- All non-essential persons should be instructed to leave the area and report to the designated site assembly point.
- If not previously informed, senior management of the company will be informed at this point of the details, nature and extent of the fire and whether assistance from staff from other depots is required.
- Ensure access routes are clear.
- If safe to do so, the Site Manager, TCM or a senior member of staff will inspect the location of the fire, to identify immediate risks to surrounding premises and the Fire Service.
- Ensure operators of appropriate machinery are standing by in a safe location to help create firebreaks, under the direction of the Fire Service.
- Ensure relevant site staff are standing by in a safe location ready to deploy additional surface water protection equipment under the direction of the Fire Service if necessary, e.g. booms, etc.
- The Site Manager / TCM will identify themselves to the fire service and will provide them with a copy of this document and update them with relevant information that will assist them in dealing with a fire more effectively.
- Implement pollution control measures only when safe to do so.
- After all occupants are evacuated and site visitors and staff are accounted for the Site Management will contact relevant businesses / receptors, starting with those immediately downwind of the fire to advise them of any particular measures required while the fire is being brought under control (e.g. the evacuation of nearby premises, closing of windows, etc.).
- After the fire has been brought under control, wait for the 'all-clear' from the FRS before returning staff to any affected area.
- Site Management will ensure the conditions that led to the fire are investigated (in association with the FRS and Police as appropriate), also plant will be safely re-commissioned, accident plans and management system documents are

reviewed and improved, training requirements for staff personnel are reviewed and that any remedial measures, including further fire reduction measures and new procedures, are implemented.

In the event of the Site Manager or TCM being absent from the site, the operator will ensure a suitable person is trained and familiar with the site.

### 9.3 Staff/Visitor Response Procedures

The following actions will be undertaken by site operatives when a fire is detected or suspected on site:

- Don't panic!
- Inform the Site Manager or TCM immediately.
- Raise the alarm, if not done so already.
- Do not try to tackle the fire yourself unless you are trained in doing so and you are sure of the nature of the fire.
- Leave the site using the nearest exit as quickly and as orderly as possible.
- Assemble at the specified fire assembly point.
- The site manager or delegated operative will be in charge of calling the emergency services on "999" and ensuring that all persons who were working in the building are assembled safely.
- Do not return to the site until you have been given the 'all clear' by the emergency services and/or the Site Manager, TCM or responsible person.

### 9.4 Site Evacuation & Drill Procedure

An evacuation plan has been formulated for the site and all persons have been made aware of it, through site induction and refresher training. The fast and effective evacuation of staff to the Fire Assembly Point shown on the 'Site Layout & Fire Plan' will ensure personnel safety on site.

Fire drills will take place every six months and one month after site operations commence to ensure evacuation times are acceptable and that site staff remain informed of evacuation procedures.

The full drill involving a dry run of the procedures involved in this document will be carried out every six months, the drill will be a simulation of an emergency with the location of a mock fire notified to staff in order to test the response speed in deploying pollution control equipment, i.e. including drain mats/plugs and ensure all fire fighting equipment is sound.

### 9.5 Out of Hours Fire Procedure

It is considered arson would be the only cause of a fire outside of operating hours, hence, the site access roads have 24 hour CCTV that is remotely accessible. Should a fire were to occur out-of-hours the following procedure will be employed:

- Irrespective of whether a company presence is required at the site by the Fire Service, the out of hours appointed contact, or delegated responsible person will attend the site to assist in any way possible and to ensure that surface water protection and control measures are deployed, if safe to do so, under the instruction of the Fire Service.
- The site appointed out-of-hours contact will subsequently contact as many additional members of staff as required to ensure that surface water protection, smothering and/or separation measures may be effectively deployed. Ideally this will be a minimum of three other staff members, enabling safe working in pairs, with at least one machine operator.

## 10 FIRE WATER

### 10.1 Drainage

The impermeable surface within the building drains to the rear and collects in a drain gully in the Northern corner of the building, it is then piped forward where it feeds into an inspection chamber that redirects the flow under the road and connects with the transfer station's sealed drainage system in the neighbouring yard. The outdoor storage area is also an impermeable surface and the drainage fall collects at a central point that feeds into its own dedicated storage tank, see the 'Site Drainage Plan' in Appendix I.

### 10.2 Fire Water Containment (Within Building)

Leftover firewater can be contained within the storage and processing area within the building, this would constitute a total floor volume of  $20.84\text{m}^3$ , which could be increased by an additional  $69.7\text{m}^3$  with the deployment of a single layer of sandbags (approximately 90 sandbags) across the front of the building. The largest stockpile of combustible waste in the building is  $100\text{m}^3$ , which, under the guidance would require 670 litres per minute for three hours ( $120\text{m}^3$ ) of water to extinguish. Therefore, the capacity for runoff storage within the internal concreted area is a little short of containment capacity for the firewater volume required to extinguish a 'worst case scenario' fire in that area. Consideration is now being given to either a reduction in the maximum stockpile volume or a significant investment in sandbags.

### 10.3 Fire Water Containment (External Storage Area)

The external, impermeable surfaced, storage area measures approximately  $1,193\text{m}^2$  and is serviced by a dedicated sealed drainage system that includes a 12,000 litre storage tank. The storage area has no edging or kerbing, therefore in itself has no storage capacity for holding any residual fire water volume, however, it is considered that the storage tank would be the obvious method of containing leftover fire water in an emergency.

The storage tank can provide a containment capacity of 12,000 litres ( $12\text{m}^3$ ) of water, the largest stockpile of combustible waste in the external concreted area can be a maximum of  $140\text{m}^3$  and under the guidance, a stockpile of this size would require 1,000 litres per minute for three hours ( $180\text{m}^3$ ) of water to extinguish. Therefore, the capacity for runoff storage within the external concreted area is also short of the capacity required to contain all firewater required to extinguish a 'worst case scenario' fire in this area. Consideration is also now being given to a solution to this situation with a view to accommodating the recommendations regarding fire water containment.

## 10.4 Fire Water Removal

Upon successfully extinguishing a fire the quality of impounded firewater would be evaluated and a decision made about its management. This could be collection by vacuum tanker for off-site treatment; TRS would consult with NRW and the sewerage undertaker in this regard

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## 11 INCIDENT MANAGEMENT

### 11.1 Mitigating Fire Impact

Fires potentially pose significant direct and indirect harm to people, the environment and commercial activities. Such impacts may include:

- Heat and flames can directly harm people and damage infrastructure and the environment.
- Release of smoke and airborne particulates can smother vegetation and present a risk to human health through inhalation.
- Contaminated fire fighting fluids migrating to drainage systems and/or controlled water (surface water and groundwater) can impact water quality and wildlife.
- Explosions and falling debris may result in physical injury to people and infrastructure in the locality.
- Fire fighting resources that are not available to attend other unrelated emergencies.
- Loss of business!

On and off-site impacts of fire can be strongly influenced by environmental factors that include wind direction, rainfall, run-off, surface water and groundwater.

- Wind direction is typically from the southwest and towards Rosemarket village some 2.5km away.
- Fire water run-off will be contained within the drainage fall areas and be prevented from migrating to surface water and groundwater by sealed drainage. This will also provide the opportunity for the Fire Rescue Service to re-circulate fire water.

### 11.2 Notifying Neighbouring Properties

The nearest receptors within 300m of the site i.e. houses, business and the Valero tank farm will be informed in the event of a fire by the operator and the Fire Service, the Local Council and NRW will also be contacted to ensure further properties are informed should the fire become problematic.

### 11.3 Contingency Planning

In the event of a fire the site will cease accepting waste and all customers who wish to deliver wastes during a fire will be notified by site administration staff, any who arrive without prior notification will be turned away.

No waste will be accepted on site until the post-fire site recovery procedures outlined in below have been fully implemented and the site is authorised to re-open for trade and waste acceptance.

### 11.4 Post Incident - Site Recovery

If a recovery procedure is required, TRS will instigate the following;

- After consultation with NRW regarding re-classification of fire damaged waste material, removal to a suitably permitted facility.
- Ask engineers to carry out repairs on any plant, vehicles and/or infrastructure.
- Assist the Fire Service with the fire investigation and where necessary engage the advice from a professional fire consultant.
- Review the FPMP and EMS procedures and improve upon where found deficient.
- Review training requirements for staff.
- Assess whether further preventative measures could be implemented.
- Ensure all fire equipment, where used, is replenished.
- Remove firewater to a permitted facility for disposal.

## **APPENDIX I – Maps & Plans**

Site Location Map & Permit Boundary Plan

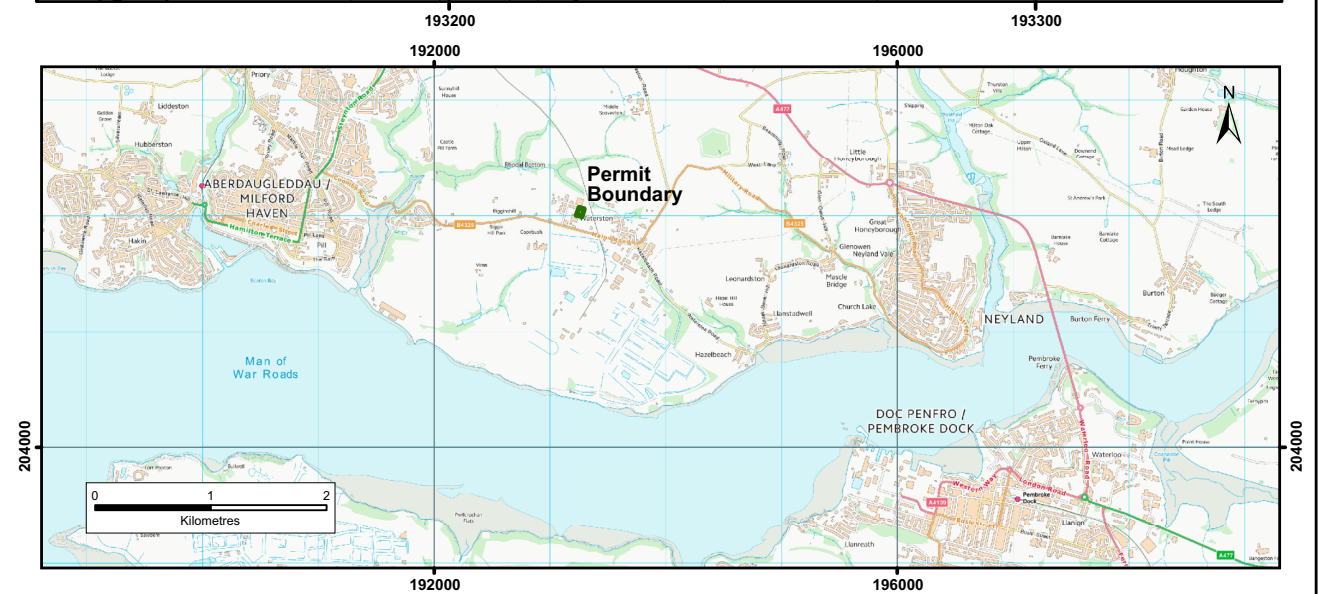
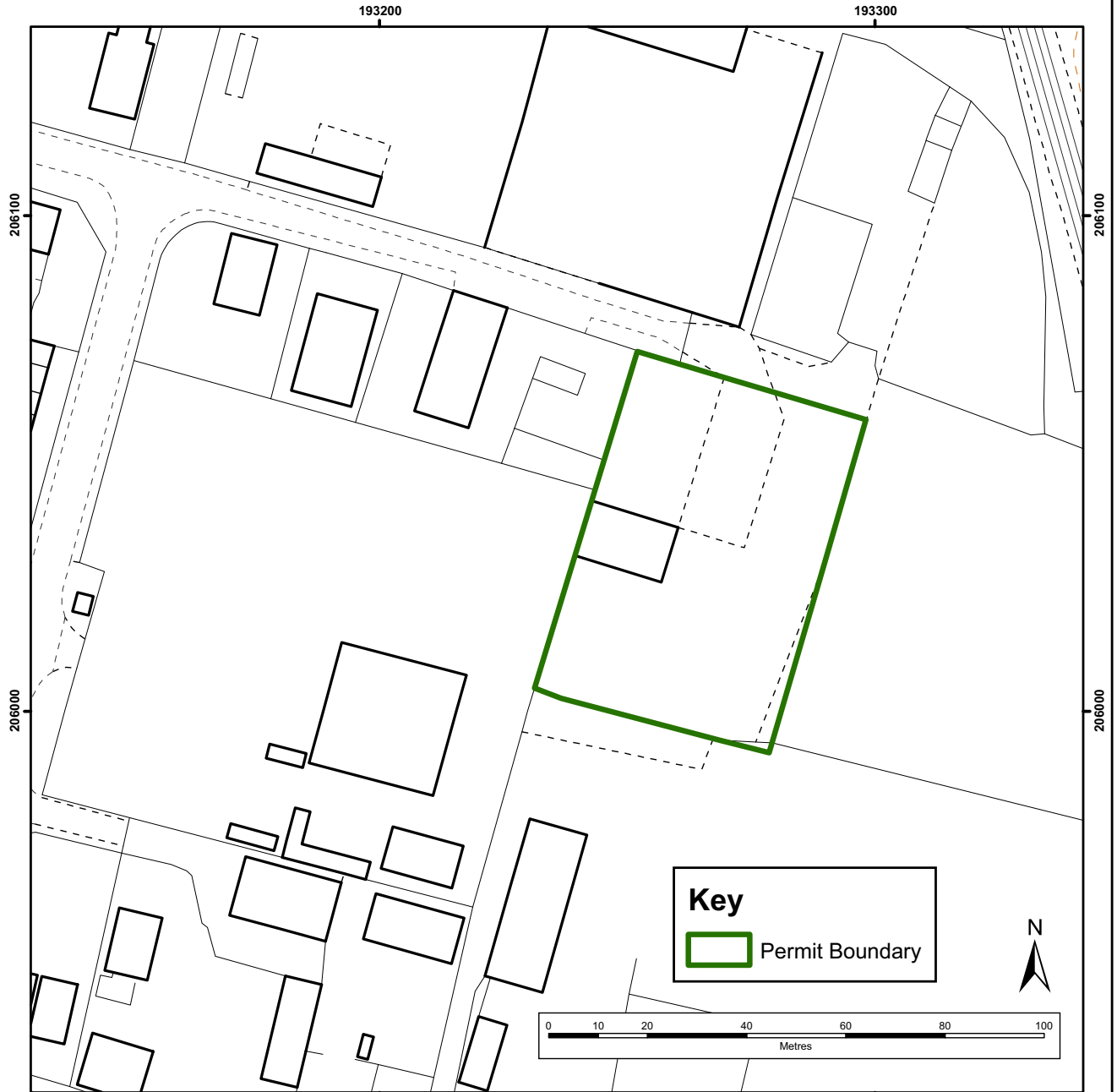
Sensitive Receptors Plan

Site Layout & Fire Plan

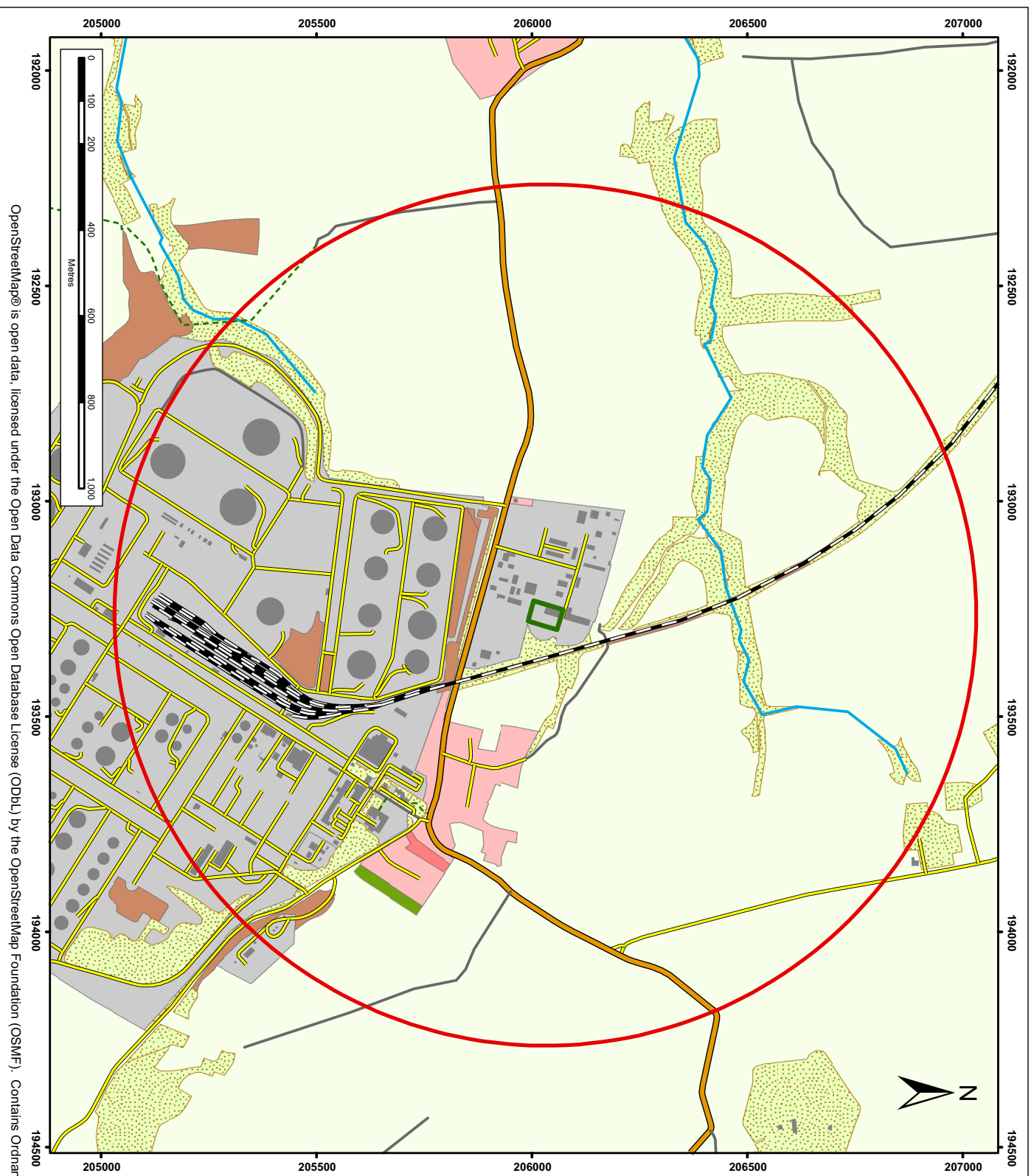
Site Drainage Plan

Emergency Services Access Plan

# Site Location Map & Permit Boundary Plan



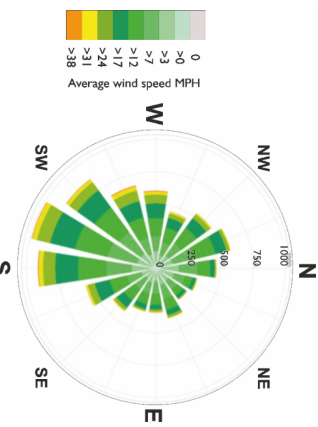
# Sensitive Receptors Plan



## Key

- Permit Boundary
- 1km from Permit Application
- Rail
- Main Road
- Secondary Road
- Tertiary/service Road
- Track/undclassified
- Bridleway/footpath
- Watercourse
- Buildings
- Public open space
- residential/garden
- Industrial
- Agriculture/woodland
- Commercial/Retail
- Scrub/Brownfield
- national\_park
- School/Education
- Healthcare
- Other Farmland/Open space

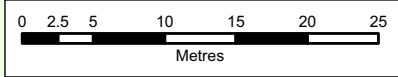
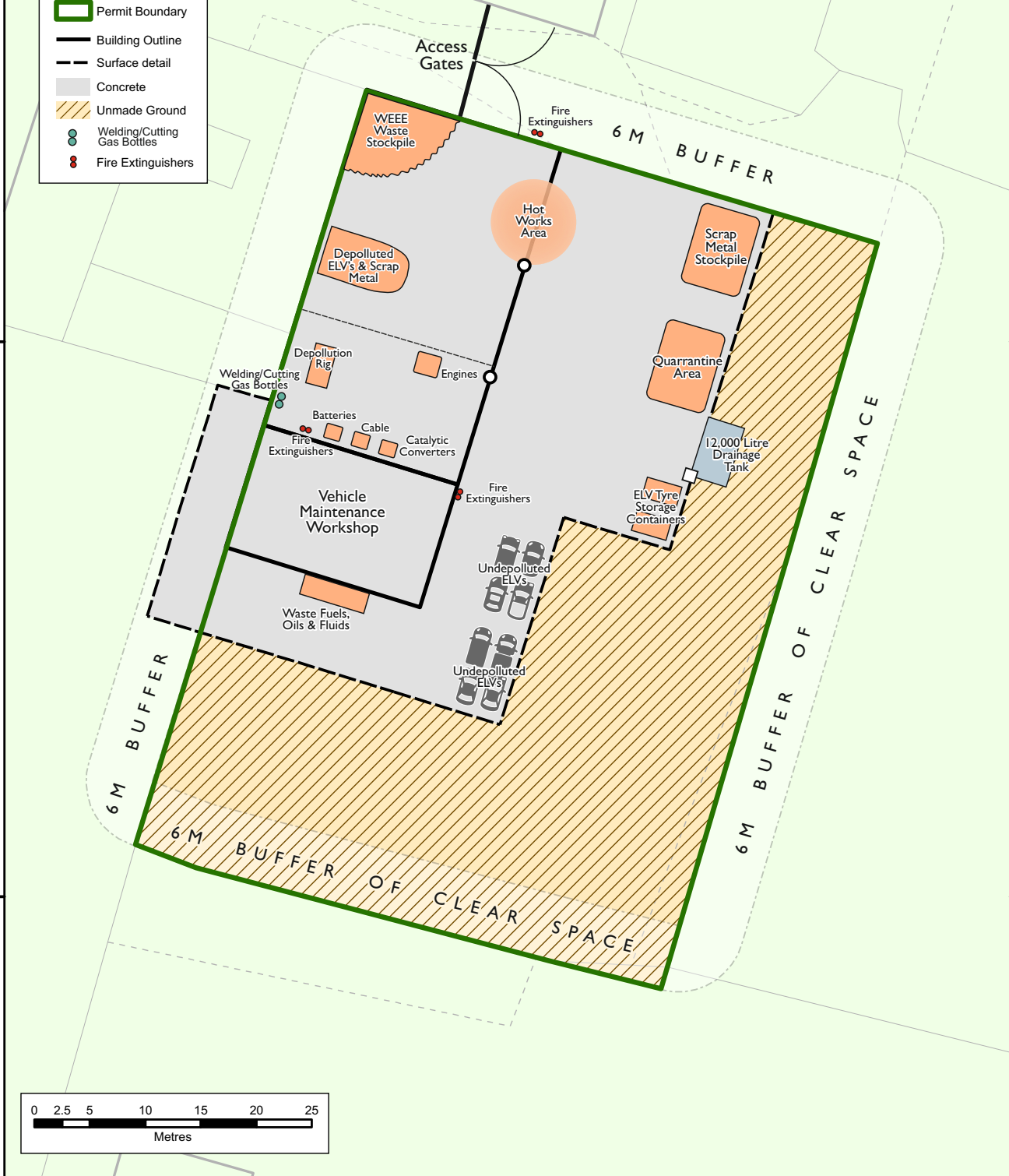
## Average Annual wind for Milford Haven



# Site Layout & Fire Plan



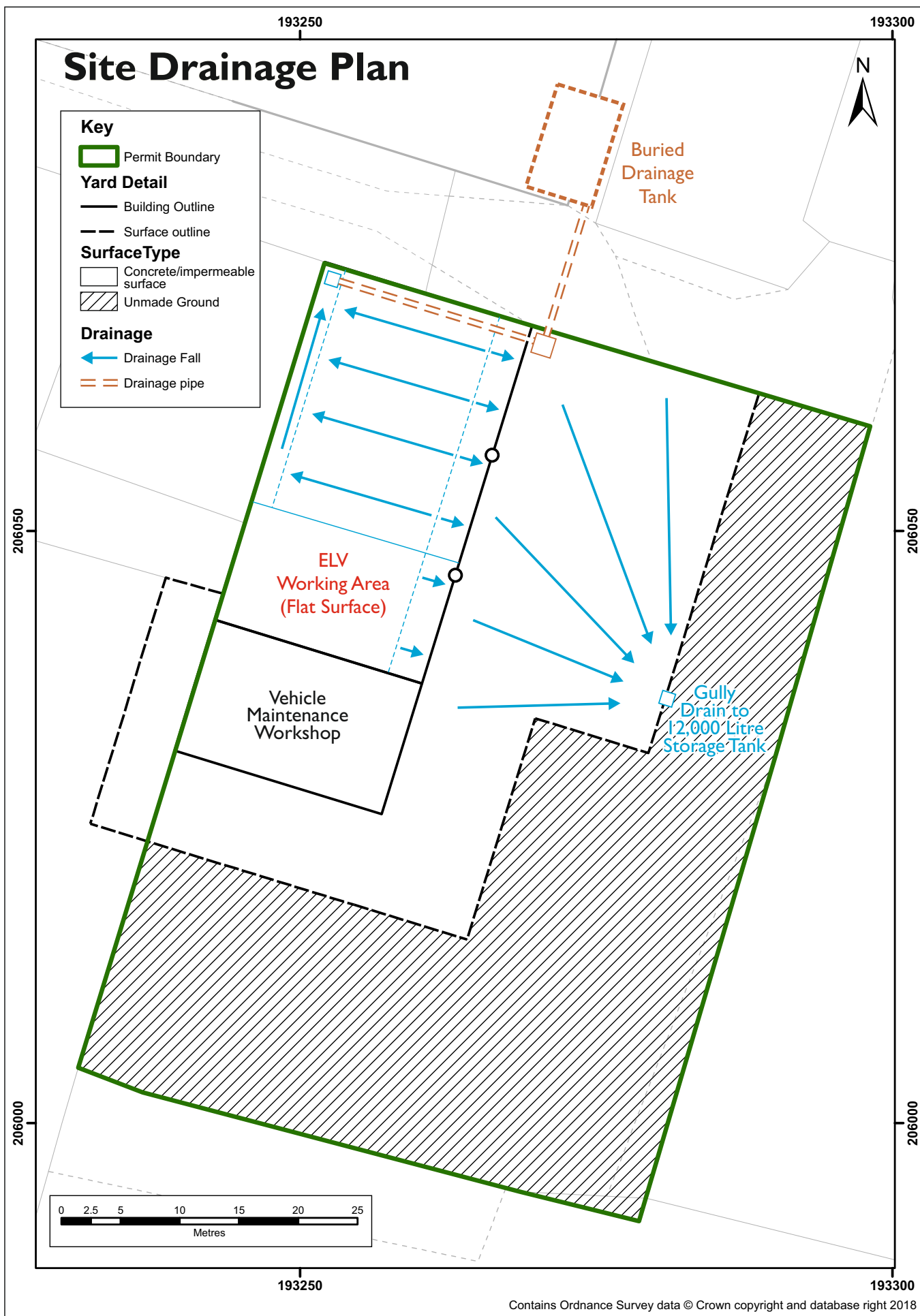
Key	
	Permit Boundary
	Building Outline
	Surface detail
	Concrete
	Unmade Ground
	Welding/Cutting Gas Bottles
	Fire Extinguishers



# Site Drainage Plan

**Key**

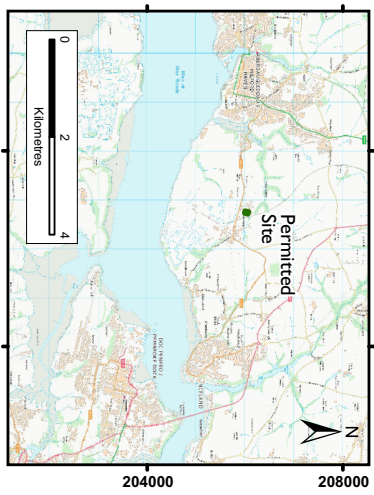
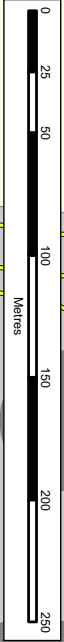
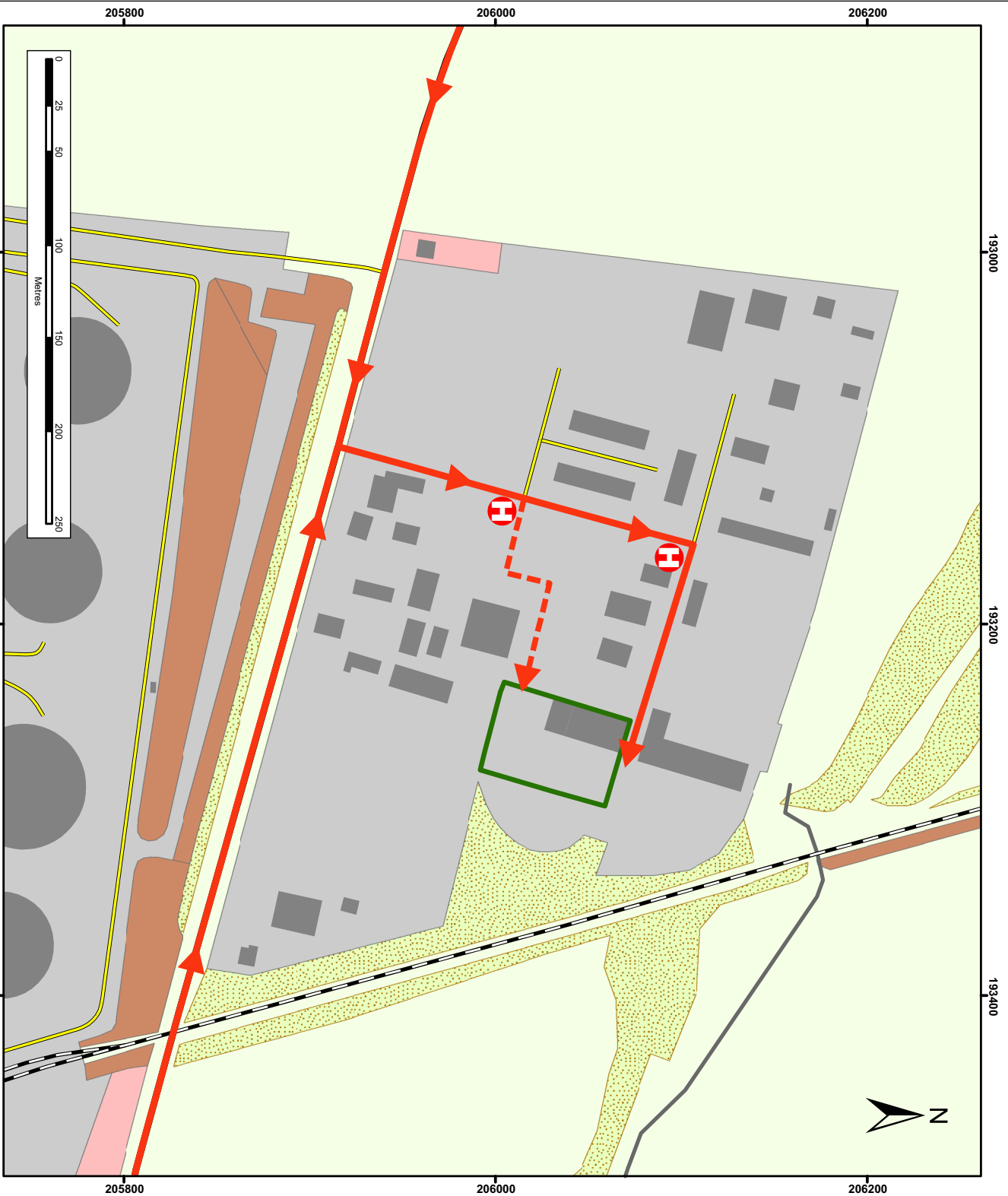
- Permit Boundary
- Yard Detail**
  - Building Outline
  - Surface outline
- SurfaceType**
  - Concrete/impermeable surface
  - Unmade Ground
- Drainage**
  - Drainage Fall
  - Drainage pipe



# Emergency Services Access Plan

## Key

-  Permit Boundary
-  Main Access via service road
-  Alternative Access through Lloyd & Pawlett yard
-  Hydrant



## **APPENDIX II – FPMP Administration**

Preventative Maintenance Checklist

Site Inspection Report

Waste Storage Details

# PREVENTATIVE MAINTENANCE CHECKLIST

<b>CHECKED BY</b>	<b>POSITION</b>
<b>DATE</b>	<b>DATE OF LAST CHECKLIST</b>

	EQUIPMENT ITEM					
<b>OFFICIAL MAINTENANCE CHECK REQUIRED (Y/N)</b>						
<b>IF NO, DATE OF LAST CHECK</b>						
<b>IF YES, DATE OF NEXT CHECK</b>						
<b>IS ITEM IN CORRECT WORKING ORDER</b>						
<b>LEAKAGES OF OIL/DIESEL ON MOBILE PLANT / VEHICLES</b>						
<b>IF NO, WHAT REPAIRS ARE REQUIRED (USE SEPARATE SHEET IF REQUIRED)</b>						
<b>WERE REPAIRS DETAILED ON THE LAST CHECKLIST</b>						
<b>IF YES, HAVE THEY BEEN CARRIED OUT</b>						
<b>ADDITIONAL REPAIRS OR ACTIONS REQUIRED</b>						

# SITE INSPECTION REPORT

**WEEK BEGINNING:** \_\_\_\_\_

Daily Inspection	Mon	Tue	Wed	Thurs	Fri	Sat	Sun	Comments
Site Entrance / Notice Board								
Security - Gates & Locks								
Security - Fencing & Boundary								
Site Access Roads - Clear								
Concrete Surfaces Damaged								
Drain & Falls Inside Functioning								
Inspection Chamber Clear								
Storage Tank Level								
Drainage Falls Outside Functioning								
Storage Tank Level								
Storage Containers & Walls								
Waste Storage Limits								
Waste Storage - Ignition Proximity								
Waste Storage - Fire Breaks								
Rejected Waste & Storage								
Waste Fuel & Oil Storage								
Fires (Reported Incidents)								
Quarantine Area Clear								
Site Signs - Condition								
Plant & Machinery Inspected								
Hot Exhausts - Dust/Fluff Removed								
Fire Fighting & Emergency Equipment								
Safety Equipment								
Accident Book & First Aid Supplies								
Welding Gas Storage								
Office & Welfare								
Noise Level								
Litter								
Dust								
Odour								
Vermin & Insects								
Records								
Site Permit Present on Site								
Site EMS Present on Site								
Site Diary Available								
Complaints Received								

General Comments:

Inspected By:..... Date:.....

## Waste Storage Details

### Waste Storage Details

Waste Stored	Form	Combustibility Risk	Max. Storage Time	Average Quantity Received	Stockpile Size (m) H x W x D	Storage Area	Storage Volume	Storage Method	Min. Storage Separation Distance	Firewater Containment	Stock Rotation
Un-depolluted ELV's	Solid	Medium	30 Days	0-5/day	4 x 6 x 4 3 High, 2 Deep	0-24m <sup>2</sup>	0-96m <sup>3</sup>	Stockpile in Open	6m	Sealed Drainage Area	Area used for bulking and storing un-depolluted vehicles, stockpile cleared no less frequently than once per month.
Depolluted ELV's & Scrap Metal	Processed	Low	10 Days	0-5/day	4 x 7 x 4	0-28m <sup>2</sup>	0-112m <sup>3</sup>	Stockpile in Open	6m	Sealed Drainage Area	Area used for bulking and sorting of metals (heavy & light iron etc.), stockpile cleared no less frequently than once per month.
Petrol	Liquid	High	5 Days	0-50 L/day	3 x 2.5 x 6.5	0-18m <sup>2</sup>	100 L 4 Drums	25 L Plastic Drums	6m	Sealed Container	Petrol is removed for disposal when drums are full.
Diesel, Oils & Coolant	Liquid	High	90 Days	0-100 L/day	3 x 2.5 x 6.5	0-18m <sup>2</sup>	1000 L Tank	Banded Tank	6m	Sealed Container	Fuel/Oil is removed for disposal when tank is full.
Washer Fluid	Liquid	Low	5 Days	0-5 L/day	3 x 2.5 x 6.5	0-18m <sup>2</sup>	5 L Container	5 L Plastic Container	6m	Sealed Container	Washer Fluid is removed for disposal when bottle is full.
Scrap Metal (Ferrous)	Unprocessed	Low	30 Days	10 Tonnes Per day	4 x 5 x 7	35m <sup>2</sup>	140m <sup>3</sup>	Stockpile in Open	10m	Sealed Drainage Area	Area used for bulking and sorting of metals (heavy & light etc.), stockpile cleared no less frequently than once per month.
Cable	Loose	Low	5 Days	0.1 Tonnes Per Day	0.5 x 1 x 1	1m <sup>2</sup>	0.5m <sup>3</sup>	Containers	1m	Sealed Drainage Area	Container is emptied when full.
Batteries	Loose	Med - High	30 Days	0.1 Tonnes Per Day	0.5 x 1 x 1	1m <sup>2</sup>	0.5m <sup>3</sup>	Containers	1m	Sealed Drainage Area	Container is emptied when full.
Engines	Loose	Low	30 Days	0.5 Tonnes Per Day	2 x 2 x 3	6m <sup>2</sup>	12yd <sup>3</sup> Container	Containers	6m	Sealed Drainage Area	Skip container is emptied when full.
Catalytic Converters	Loose	Low	30 Days	3/day	0.5 x 1 x 1	1m <sup>2</sup>	0.5m <sup>3</sup>	Containers	1m	Sealed Drainage Area	Container is emptied when full.
ELV Tyres	Loose	Low	30 Days	0-20 Tyres Per Day	2 x 2 x 3	6m <sup>2</sup>	12yd <sup>3</sup> Container	Containers	6m	Sealed Drainage Area	Skip container is emptied when full.
WEEE Waste	Loose	Med - High	30 Days	5 Tonnes Per Week	4 x 3.5 x 7	25m <sup>2</sup>	100m <sup>3</sup>	Stockpile Against Walls in Building	11m	Sealed Drainage Area	Stockpile is loaded from the back ensuring rotation.

N.B. See 'Site Layout & Fire Plan' for stockpile locations.