

The following information has not been included in your fire plan and as per our guidance it **must** be included.

- The amount of waste received daily and how it is managed
- The total amount of waste and the types and forms (e.g. unprocessed, shredded, chipped, fines or baled) that are stored on site at any one time
- How each waste type will be stored
- all combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on people, critical infrastructure and the environment) and how they will be minimised
- Contact details of sensitive receptors within 1km of your site

### **Site plan**

- Any areas where hazardous materials are stored on site (location of gas cylinders, process areas, chemicals, pile of combustible materials, oil and fuel tanks)
- the location of plant, protective clothing and pollution control equipment and materials
- location of “off- site” emergency information pack with site

Ideally all the site plan information should where possible be included on one plan, in this case it is over four separate plans.

You **should** address:

Actions to be taken should a fire occur such as:

- reducing the amount of firewater run-off generated - use sprays and fogs rather than jets
- recycling firewater if it's not hazardous and it's possible to reuse
- applying water to cool unburned material and other hazards, taking care to prevent this water causing or adding to water pollution and/or increasing air pollution
- separating unburned material from the fire using heavy plant
- separating burning material from the fire to quench it with hoses or in pools or tanks of water (this will reduce the amount of firewater produced)

To decide which of these options, or combinations of options, is appropriate you should consider the following.

- scale and nature of the environmental hazards on site and the activities that take place on it
- risks posed to people, the environment and property
- type of materials you store on site, the form they're stored in and the length of time needed to extinguish a fire involving them

- local topography, weather conditions and fire scenarios that could reasonably be expected on site

You have not provided sufficient information with regards to the following areas of our fire prevention and mitigation plan guidance.

### **Common causes of fires and preventative measures**

- Visitors & contractors
- Ignition sources
- self-combustion (e.g. due to chemical oxidation)
- Build up loose combustible waste, dust and fluff
- “Tramp” metal
- Batteries within waste deposits
- Cylinders stored at site
- Leaks and spillages of oils and fuels

### **Storage times and self-combustion factors**

- reduce risk factors (e.g. exposed metal content, proportion of 'fines', mixing of materials and heat generated during treatment)
- minimise stacks sizes (small stacks with appropriate separation are safer than one larger one)
- control moisture levels
- store material in its largest form prior to processing e.g. do not undertake preparatory treatments such as size reduction of green waste unless you are intending on
- routinely turn stacks
- detect and control hotspots within stacks
- define the maximum storage time of all materials on site and show how this will be monitored and controlled
- minimise external heating during hot weather by shading from direct sunlight

### **Managing Waste Material Stacks and Separation Distances**

- Are stack lengths and separation distances in line with **Graph 1** for general wastes such as RDF, SRF (Refuse derived fuel/solid recovered fuel - various types of fuel derived from wastes using various treatment processes), wood, paper etc.
- Are stack lengths and separation distances in line with **Graph 2** for plastics and rubber wastes? - *Are being stored in skips no separation distances stated. Separation distances need to be stated to confirmed that they meet with our guidance and are suitable for the waste streams being stored.*
- Graphs 1 and 2 assume a stack height of 4m, if stack sizes are significantly lower bespoke separation distances can be used - *Some stacks are below 4 meters but have not given any info on bespoke separation distance.*
- Has a competent fire engineer been used to calculate any bespoke separation distances?
- manage all stacks of materials that can self-combust and demonstrate suitable additional precautions if they are stored for more than 3 months

### **Baled waste storage**

Baling of waste has been outlined in the EMS but storage of this baled waste has not been addressed in respect of the requirements of the FPMP guidance.

### **Enclosing stacks using bays and walls**

The guidance states that the FPMP SHOULD demonstrate:

- protection from wind
- how you intend to check temperature and moisture content of all the material within the bay so that the entire volume of the pile receives representative checks
- how stock capacity will be managed and controlled
- how you will ensure segregation of materials
- how calculation of flame height and radiation has been taken into account in preventing the spread of fire between piles
- prevention of brands or lighted material moving outside the bay walls
- prevention of bridging across or around walls
- how a 'freeboard' space at the top and sides of the walls will be physically retained at all times in accordance with the latest available guidance
- the frequency and method of turning piles

### **Waste stored within a building**

The EMS discusses operations occurring within the waste transfer building but the fire plan does not address any operations occurring within a building.

### **Firefighting Strategy**

A specific firefighting strategy has not been outlined

### **Water supplies**

- alternative water supplies.

### **During and after an incident**

No information outlined in respect of this section of our guidance.

### **Reviewing and Monitoring your Fire Prevention & Mitigation Plan**

No information outlined in respect of this section of our guidance.

The response to the below sections does not cover all the information outlined in our FPMP in respect of these sections. The level of detail is not sufficient to ensure the FPMP complies with our guidance:

#### **Managing fire water**

#### **Designated quarantine area**

#### **Waste Stored in containers**

#### **Layout of waste stacks on site**

#### **Monitoring and turning of stacks**

#### **Fire detection and fire suppression systems**

