

## FIRE STATEMENT

Old Coal Depot, Tavistock Road, West Drayton, London Borough of Hillingdon

**Punjab Skips**



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## Document History:

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## Site Information & Key Contacts List

<b>Site Address:</b>	Old Coal Depot, Tavistock Road, West Drayton, London Borough of Hillingdon		
<b>Site Operator:</b>	Punjab Skips	<b>National Grid Ref:</b>	TQ 0552 8025

CONTACT	DESCRIPTION	OFFICE HOURS	OUT OF HOURS
Harsimran Sran	Directors	07749112313	07749112313
Harsimran Sran	Site Manager	07749112313	07749112313
Hillingdon Hospital, Pield Heath Rd, Uxbridge UB8 3NN	General Enquiries	01895238282	
	Accident & Emergency (A&E)	01895 279314	
	NHS Direct	111	111
The Green Medical Centre, 6 The Green, West Drayton UB7 7PJ	Local Doctor Surgery (GP)	01895 442026	111
Hayes Police Station 755 Uxbridge Rd, Hayes End, Hayes UB4 8HU	Local Police Non-Emergency	101	101
	Police Emergency	999	999
Hillingdon Fire Station, Uxbridge Road, UB10 0PH	Fire and Rescue Service (in Emergency Dial 999)	020 8555 1200	999
Environment Agency, Weybridge, Shepperton TW17 9LJ	Environmental Regulator	07946702414	0800 80 70 60
London Borough of Hillingdon	General Enquiries	01895 250111	01895 250111
	Planning Dept.	01895 250230	01895 250111
	Environmental Health Dept.	01895 556000	01895 250111
Thames Water, Clearwater Court, Vastern Road, Reading RG1 8DB	Mains water and sewerage supplier	0800 316 9800	0800 316 9800

# **1 Introduction**

## **1.1 Fire Prevention Objectives**

1.1.1 This Fire Statement has been designed to meet the following 3 objectives:

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

1.1.2 The site will operate under the conditions of an Environmental Permit and a site specific Fire Prevention Plan. All site staff and contractors must be aware and understand the contents of the Fire Prevention Plan (FPP) and what they must do during a fire.

1.1.3 The FPP document will be kept in the site office as shown on the 'Site Layout & Fire Plan' in Appendix I of this document.

## **1.2 General Site Information**

1.2.1 This document considers the risks associated with fire on site at Old Coal Depot, Tavistock Road, West Drayton, London Borough of Hillingdon. The site will be operated as a non-hazardous Household, Commercial and Industrial (HCI) waste transfer station with treatment.

1.2.2 The proposed waste transfer station building would be located in the north of the application site, as shown on the Site Layout Plan. The waste transfer station building would have a total height of approximately 11.5m to the roof ridge (10m to the eaves) and an approximate footprint of 30m length by 30m width (i.e. 900m<sup>2</sup>). It is proposed that the building walls and roof would be constructed of 0.4mm profiled steel cladding. The waste transfer station building would be open fronted on its southern elevation with enclosed sides on the western, eastern and northern elevations.

1.2.3 In summary, waste treatment processes carried out on site would include the following:

- i) Compacting (by loading shovel or grab)
- ii) Sorting (with loading shovel, 360 excavator with grab/bucket or floor sorting and

hand/picking line)

- iii) Screening/separation (by using appropriate plant and equipment i.e. trommel screen)
- iv) Shredding
- v) Baling and compaction

- 1.2.4 If additional processes are to be used, the FPP will be updated accordingly and sent to the EA for comment.
- 1.2.5 The site receives waste from Punjab Skip Hire Ltd's own operations and provides a tipping facility for a wide range of regular customers from the local area to promote recycling and reduce fly tipping.
- 1.2.6 In addition to this document the site is managed and operated in accordance with a fully comprehensive Environmental Management System (EMS). Reference should be made to Section 3 of the EMS which details the acceptance, storage, treatment and removal of waste.
- 1.2.7 The layout of the site is shown on Drawing No. PUN/SRP/01 as shown in Appendix I of this document.

### **1.3 Staffing and Management**

- 1.3.1 The table below details the staff structure of the site when operating at full capacity. Positions in bold italic print below are the minimum staff requirements when the site is open for the reception of waste and, therefore, shows the minimum number of staff available to tackle a fire on site during operational hours. Only the site manager, machine/plant operators and general operatives will be permitted to tackle fires on-site.

**Table 1.3.1**

<b>Position</b>	<b>No. of Employees</b>	<b>Responsibilities</b>
Site manager	<b>1</b>	Overseeing and co-ordinating all activities which take place at the site
Machine / plant operator	<b>2</b>	Operating loading plant / site supervision
Site / office manager	<b>1</b>	Managing site administration
General operatives	<b>4</b>	Sorting waste, maintenance, litter picking etc.

## **1.4 Plant and Equipment**

1.4.1 The table below details the proposed plant/equipment on site in relation to the waste operations. Only trained operators will be permitted to drive/operate the plant/equipment listed below.

**Table 1.4.1**

<b>Item</b>	<b>Number</b>	<b>Function</b>
360° excavator with grab attachments	2	Loading/unloading/movement/sorting
Trommel screen & conveyor	1	Mechanical treatment of mixed waste

1.4.2 All plant will be stored on site and will only be operated by trained personnel.

## **1.5 Hours of operation**

1.5.1 The site would operate according to the hours specified below:

Monday to Friday	07:00 - 18:00
Saturday	07:00 - 13:00

## **1.6 Correspondence with Fire and Rescue Service**

1.6.1 London Fire Brigade (LFB) were contacted in the preparation of this Fire Statement with a view to obtaining details regarding the nearest hydrants in the proximity of the site and also their projected water supply in the event of an incident. The site is bounded by railway lines

on all sides and no fire hydrants are located within this boundary. However, the site is located just 150m from Frays River.

1.6.2 Punjab Skip Hire Ltd will seek a response from the EA and LFB should a fire incident occur or any major site, infrastructure or operational changes with regards to their FPP and associated operations on site. This regular correspondence will ensure all measures to prevent, mitigate and contain fires on site are up to date and deemed sufficient by the EA & LFB.

## **1.7 Sensitive Receptors**

1.7.1 A Sensitive Receptors Plan (Drawing No. PUN/SPR/02) has been provided in Appendix I to highlight the main receptors within 1,000m of the site.

1.7.2 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 of a fire if it does occur. These measures will ensure the potential impact on any of the surrounding land is as minimal as practicably possible.

1.7.3 The primary sensitive receptors for any fire event would be the site itself and any site users. Surrounding land uses are predominantly industrial and include other waste management operations. Residential housing developments are present 150m to the south and 150m to the east of the site. In general, land lying west of the site comprises lakes and deciduous woodland whilst land to the east of the site is occupied by residential and commercial development (See drawing PUN/SPR/02).

## 2 Managing common causes of fire

### 2.1 Details

2.1.1 The following list outlines common causes of fire and outlines specific examples of these sources, the associated risks and any mitigation measures necessary to manage them:

Source	Risk	Specific mitigation
Arson or vandalism	Deliberate ignition of wastes by intruder(s) and/or vandalism of 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.
Mobile plant/equipment	e.g. spillages of fuel, sparks from machinery or malfunction caused by ineffective maintenance	Mobile plant/equipment will be kept 6m from combustible waste out-of-hours and each item will be visually inspected prior to use for the presence of leaks and its suitability. All plant / equipment undergoes a preventative maintenance checklist as shown in Sections 2.5-2.6. All mobile plant / equipment has its own automated fire detection and suppression built in meaning a fire in relation to plant failure will be immediately extinguished.
Electrical appliances and cabling	Faulty appliances or damaged/ exposed electrical cables may spark as a result of a power surge	All electrics on site will be fully certified by a qualified electrician and with written procedures in place that set out the regular maintenance.  Any potential ignition sources from suspected electrical faults should be isolated and an electrician should be contacted immediately to rectify the situation. Where possible, staff should immediately remove any stored wastes from the vicinity of the fault area or cable traverse if safe to do so.
Discarded smoking materials	Risk of ignition of stored wastes from smoking materials which have not been fully distinguished	The main operational site has a strict no smoking policy.
Gas canisters	e.g. gas cylinders, fuel tanks, aerosols or combustible liquids and chemicals on site.	Oxy acetylene equipment for welding and an LPG cage for empty cylinders are stored more 6m from combustible or flammable materials and only take place within the site workshop.
Open burning on site or on adjacent sites	Risk of ignition from radiative heat or flaming from open burning on site or an adjacent sites	Open burning is strictly prohibited at the site. Staff are trained regarding the implications if they are found to be carrying out this operation.

Source	Risk	Specific mitigation
Overheating of stored waste	sources of heat may include heating pipes, hot exhausts, light bulbs, space heaters or direct	Reference should be made to Section 4 of this Statement which details storage and processing procedures for all wastes on site.
Sparks from loading buckets/shovels	Scraping of loading buckets/shovels causing sparks which may ignite stored wastes	Fire extinguishers will be fitted in the cab of all loading plant and operational vehicles.
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	Hot works will be not routinely be carried out on site. If hot works are absolutely essential and no alternative can be found, the hot works procedure set out at section 2.3 will be followed.
Industrial heating	Industrial heaters and/or pipework used to heat internal and external areas on site which may, in turn, supply heat to stored wastes increasing the risk of combustion	There are no industrial heaters situated at the site.
Hot exhausts	Potential source of ignition for both primary and residual heat to stored wastes	Hot exhausts will be kept 6m from combustible waste piles during out-of-hours. Staff will be trained and made aware of the risk. The site manager will constantly monitor operational staff/plant; and where possible, ensure a 6m distance is maintained.
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 will be monitored daily as per the checklist and dedicated site staff using cleaning agents to keep the areas around plant and equipment clear of debris. Shift teams at end of each shift clean the area around the equipment they have been working on and ensure the equipment is clear of all debris and material. This is shown on Section 2.5.5.
Hot loads	Imported wastes which may contain materials which are above ambient temperature	All loads are inspected in accordance with strict waste acceptance procedures. If such loads arrive at site they are intercepted by site operatives who will refuse the acceptance of the waste. If found following tipping, they will be consigned to the quarantine area to ensure the material does not pose a concern/fire risk to the site. The material will, if required, be treated to ensure the risk of fire is completely negated.
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 powerlines located in close proximity to the site.
Naked flames, space heaters, furnaces, incinerators	Potential source of ignition for both primary and residual heat to stored wastes	None present at the site.

## **2.2 Fuel storage**

2.2.1 The site will store the following fuel/oil at the site:

- i) Diesel = 20,000 litres
- ii) Engine oils = 205 litres
- iii) Hydraulic oils = 205 litres
- iv) Gear oil = 205 litres

2.2.2 The fuel and oil is not stored within the main site building for waste storage and treatment but are instead stored adjacent to the site offices, where they are regularly monitored.

2.2.3 The following ensure tanks do not cause a fire risk at the site:

- Tanks are surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipework and associated infrastructure will be enclosed within the bund.
- A lock will be fitted to the tank valve to prevent unauthorised operation.
- All valves and gauges on the bund will be constructed to prevent damage caused by frost.

2.2.4 All tanks are clearly marked showing the product within and also its capacity.

## **2.3 Hot works procedure**

2.3.1 The following procedures are implemented at the site:

- Check that hot work is required or could you use an alternative (drill and bolt etc.)?
- If not and there is ABSOLUTELY NO ALTERNATIVE proceed as below:
  - Clear the area of all flammables. The “area” is the distance around you which could be affected by sparks or heat. If practical this should be 10m around the welding site.
  - There will be occasions when removal of all flammables within 10m will not be possible i.e. grease in bearings, then you must shield flammables as far as is practicable with screens or non-flammable materials such as fire blankets or sand.
  - Ensure you have TWO fire extinguishers to hand. The type would depend on your

working environment but generally a CO<sub>2</sub> and a Powder extinguisher would be suitable.

- When you are ready to setup you will need to get a key to unlock the welding equipment from the Site Engineer.
- When you are set up you must get the site supervisor or manager to check your preparation.
- If they are happy, they will sign your Permit which should be displayed and you can proceed.
- Ensure you have used screens to shield bystanders from sparks and welding flash.
- During 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 on the Permit.
- Check again for fire for at least 30 minutes and if all is clear, the Permit must be signed off as cancelled. This would usually be by the person who authorised it, but may be another person authorised by site management to do so.
- Hot work in the waste transfer station requires one Permit per person for each day.

## **2.4 Smoking policy**

2.4.1 Smoking of cigarettes and e-cigarettes is prohibited in operational areas on site.

2.4.2 Employees who wish to smoke may do so in their own time during lunch breaks at a location outside of the operational site.

2.4.3 Managers will be responsible for the promotion and maintenance of the 'no smoking policy' in operational areas of the site by their staff. Managers will receive training and guidance regarding their responsibilities in relation to the policy and enforcement of it.

2.4.4 Employees should inform the appropriate manager immediately if anyone fails to comply with the policy.

2.4.5 Employees not complying with the policy will be referred to their manager for support subject to the usual disciplinary procedure.

2.4.6 Visitors not adhering to the policy will be asked to comply or leave the site.

2.4.7 All job applicants will be made aware of the policy via application packs, where a requirement to abide by it will be part of the person specification. Applicants will be

reminded of the policy at interview stage.

- 2.4.8 A copy of the policy will form part of new employees' induction packs. Training and guidance on enforcing the policy will form part of new managers' induction process.
- 2.4.9 The policy will be reviewed every 12 months.

## **2.5 Plant and equipment maintenance**

- 2.5.1 Any spillages of fuel will be cleared immediately by depositing sand or absorbents on the affected area and removed to the quarantine area or to a dedicated skip to await removal to a suitably permitted facility.
- 2.5.2 External separation distances of at least 6m will be observed between plant and stored material when the site is not staffed. In the building, all plant will be powered-down and completely shut off prior to cessation of operations on any given day. Plant which is not in use for any extended period will be stored as shown on Drawing No. PUN/SPR/01.
- 2.5.3 All operational vehicles will contain fire-fighting equipment i.e. fire extinguishers in the cab.
- 2.5.4 Mufflers will be fitted onto hot exhausts to ensure the source of ignition from plant/equipment is reduced to a minimum.
- 2.5.5 Dust from processing/treatment operations on site can settle at the end of the shift / working day onto hot exhausts and engine parts so a fire-watch will be implemented after cessation of works. Any build of dust/fluff will be removed from the equipment by using manual techniques i.e. hose/brush at the end of the working day and depending on weather conditions, more frequent. The checklist will be completed and comments noted in the inspection sheet shown in Appendix II or the operator's own in house inspection procedural checklists.
- 2.5.6 Site management will undertake or delegate additional preventative maintenance checks on a daily basis to ensure it is mechanically sound and no obvious leaks are present.

## **2.6 Preventative Maintenance**

- 2.6.1 All items of plant and equipment listed in Section 1.4 will be subject to preventative maintenance checks to ensure their safe operation and to prevent any potential situations which may give rise to faults or malfunction. A preventative maintenance and fire checklist are shown in Appendix II of this Fire Statement as a guide for the operator to observe.

However, the operator may have their own in house checklists.

2.6.2 Much of the plant and equipment on site and all vehicles in the fleet will be subject to manufacturer maintenance to ensure proper working order in the form of service contracts. Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis to ensure i.e. daily, before, during and at the end of each working day to ensure where possible, the machinery is mechanically sound and comments noted on an inspection sheet.

## **2.7 Site security**

2.7.1 The boundary of the site is protected from unauthorised access by members of the public for security. The site is surrounded on three sides by concrete walls of at least 2.5m in height. The rear of the site is secured by a soil bund and the metal wall of the proposed waste transfer station building. The site access gates are of steel construction and are lockable to prevent unauthorised vehicular or pedestrian access out-of-hours.

2.7.2 The site has 24 hour CCTV system. The site also benefits from the presence of a 24 hour security guard.

2.7.3 The site security measures will be inspected daily and any defects which impair the effectiveness of the security will be repaired by the end of the working day. If this is not possible, temporary measures will be put in place to ensure no unauthorised access to the site can be gained until the proper repairs can be carried out as soon as practicably possible.

2.7.4 If unauthorised access becomes apparent as a problem at the site, the security measures will be reviewed and improvements implemented.

## **2.8 Electrical faults or damaged/exposed electrical cables**

2.8.1 All electrics on site will be fully certified by a qualified electrician annually and with written procedures in place that set out the regular maintenance. PAT tests will be kept in the site office for inspection by the EA / HSE.

2.8.2 Any potential ignition sources from suspected electrical faults will be isolated and an electrician should be contacted immediately to rectify the situation. Where possible, staff should immediately remove any stored wastes from the vicinity of the fault area or cable traverse if safe to do so.

### **3 Waste acceptance procedures**

3.1.1 Strict waste acceptance procedures will be in place at the site and the following details will be recorded for every load deposited at the site which has been extracted from Section 3 of the site's EMS:

- a) The date and time of delivery.
- b) The name and address of the waste producer.
- c) A detailed and accurate description of the waste including type, quantity (in tonnes and/or cubic metres) and EWC codes.
- d) How the waste is contained e.g. loose, container type.
- e) The carrier's name and address.
- f) Driver's name, signature and vehicle registration No.
- g) Signature or initials of person(s) producing/ accepting/ inspecting/ carrying the waste.
- h) Additional handling details/notes made by the driver after inspection of the load.
- i) SIC code of the premises which produced the waste (where relevant).
- j) Waste hierarchy declaration.
- k) Information on previous treatment of the waste e.g. manual or mechanical.

3.1.2 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site and the EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of Permit conditions or a potential risk of combustion.

## **4 Managing waste storage to prevent self-combustion and the fire spreading**

### **4.1 General**

- 4.1.1 The only pile of combustible waste that will be present on site is in the reception area which will have a maximum size of 25m<sup>3</sup> and will be constantly attended and removed by the end of the working day. All other waste storage will be within containers (20 to 40yd<sup>3</sup> ROROs).
- 4.1.2 The operator will minimise pile sizes and store waste materials as discussed below.
- 4.1.3 The aim for the site operator is to follow a 'first in, first out' principle where incoming waste is sorted and processed on arrival to arrange for its export off site as soon as practicably possible, to minimise over-stocking which in-turn minimises the risk of overheating and spontaneous combustion.
- 4.1.4 It is also the operator aim not to store unsorted combustible waste. All waste once sorted will be placed into containers and will be moved off site as soon as they are full.

### **4.2 Combustible waste pile storage**

- 4.2.1 Table 4.2.1 on the next page details the waste stored and on-site procedures to reduce the risk of the pile combusting. Table 4.2.2 continues to list the wastes stored on site which are not considered combustible (reference should be made to Drawing No. PUN/SPR/01 for details of the locations of the storage areas):

**Table 4.2.1**

<b>Pile / Container Reference (Combustible Waste)</b>	<b>Storage/monitoring procedures to reduce the risk of fire</b>
Pile 1 - Waste reception area for Household, industrial commercial and construction / demolition waste	<ul style="list-style-type: none"> <li>Once tipped the any large visible recyclables will be hand-picked and subsequently moved using the mechanical grabs and placed into one of relevant storage containers at the site.</li> <li>The waste in this stockpile will be tipped at the front of the stockpile and then extracted from the rear of the stockpile to ensure the first in first out principle will apply. The stockpile is therefore dynamic and, given the material throughput of the plant on site, waste will not be stored in this pile for longer than 24 hours.</li> <li>The pile can be visually monitored throughout the day by trained site operatives who will be trained via toolbox talks in recognition of fire risks.</li> <li>Apart from the use of loading equipment to load the waste from this area, no mechanical processing will take place within 6m of this pile so it is unlikely to reach a trigger temperature.</li> <li>Due to the immediate nature of treatment / sortation, a maximum projected pile size of 25m<sup>3</sup> should be acceptable and visual monitoring by trained staff throughout the day is considered ample.</li> <li>The pile will undergo constant monitoring via thermal imaging (see Appendix V) and if a temperature of 65°C is detected, the waste will be turned and then consigned immediately to the quarantine area if the temperature hasn't reduced.</li> </ul>
Container 1 - Wood which has been mechanically sorted or hand picked	<ul style="list-style-type: none"> <li>Sorted wood waste will be stored in a 40 yd<sup>3</sup> RORO skip container and will be removed from the site when full.</li> </ul>
Container 2 – Card which has been mechanically sorted or hand picked	<ul style="list-style-type: none"> <li>Sorted card will be stored in a 40 yd<sup>3</sup> RORO skip container and will be removed from the site when full.</li> </ul>
Container 4 – Non-recyclable waste.	<ul style="list-style-type: none"> <li>Waste which cannot be recycled following sortation will be placed in a 40 yd<sup>3</sup> RORO skip container and will be removed from the site when full.</li> </ul>
Container 5 – UPvC windows and doors	<ul style="list-style-type: none"> <li>Separated UPvC frames will be stored in a 20 yd<sup>3</sup> RORO skip container and will be removed from the site when full.</li> </ul>
Container 6 – Plastic packaging including plastic builder's bags	<ul style="list-style-type: none"> <li>Separated plastics will be stored in a 20 yd<sup>3</sup> RORO skip container and will be removed from the site when full.</li> </ul>

**Table 4.2.2**

<b>Pile / Container Reference (wastes with low or no combustibility)</b>	<b>Storage/monitoring procedures to reduce the risk of fire</b>
Pile 2 & 3 - Hardcore and soil storage area	<ul style="list-style-type: none"><li>Hardcore and soils will be stored in separate piles within the building.</li></ul>
Container 7 – Sorted, uncontaminated ferrous metal	<ul style="list-style-type: none"><li>Separated ferrous metal will be stored in a 40 yd<sup>3</sup> RORO skip container and will be removed from the site when full.</li></ul>
Container 8 – Sorted uncontaminated Non-ferrous metals and large ferrous (i.e. girders)	<ul style="list-style-type: none"><li>Separated non-ferrous metal and large metal articles will be stored in a 40 yd<sup>3</sup> RORO skip container and will be removed from the site when full.</li></ul>

## **4.3 Waste stored in containers**

4.3.1 The following measures are in place for the containerised wastes described above. Once the containers are full, they will be removed to a suitably permitted site. The containers are situated on the ground so can be quickly moved by mobile plant in the event of a fire in close proximity.

- i) Any waste stored in skips/containers will consist of waste which will have been handpicked and sorted manually or mechanically.
- ii) As the waste in the skip will be pre-sorted, it will not contain any hot loads which could lead to a spark or overheating causing a fire.
- iii) The container will be removed from site when full.
- iv) The containers containing combustible waste will have a 6m separation distance from all 4 sides and access from the top in the event of a fire occurring in the skip to allow access for fire- fighting.
- v) The waste in the containers will not exceed the height of the containers which is approximately 2.5m.
- vi) In the event of a fire breaking out in a container, other containers nearby can be moved to the quarantine area in order to prevent the spread of fire.

## **4.4 Site inspection program**

- 4.4.1 A daily fire watch using the Fire Checklist will monitor the site at set intervals during the working day, to detect signs of a fire from hot exhausts or engines and cleaning up of loose combustible waste. The intervals may vary due to site operations but there will be at least one at the start and end of each working day. Operational staff may be given a dedicated section of the Fire Checklist to ensure they can monitor at all times throughout the working day. It is estimated the fire watch will take a minimum of 15 minutes but start and end times will be completed using the fire checklist.
- 4.4.2 Carrying out the above checks daily will keep the levels of dust, fibre, paper and other loose combustible materials, which could aid in the acceleration of a fire, on site surfaces to a minimum and ensure all containment of wastes on site are functioning effectively in accordance with the storage limitations provided in the tables 4.2.1 and 4.2.2.

## **4.5 Staff training**

- 4.5.1 The site managers and TCM will be suitably qualified to carry out specific fire risk training to all operational staff who work in relation to combustible waste activities.
- 4.5.2 Each relevant staff member will undergo training from the on-site fire marshal using the forms shown in Appendix II of this FPP or the operators own in-house records. New members of operational staff will be required to complete a training sheet and be deemed competent in completing the fire checklist. As a minimum, each relevant member of staff will be assessed from the date of approval of this FPP and then every 12 months afterwards.
- 4.5.3 Ongoing training by the TCM, site manager using toolbox talks will also be provided to ensure site staff are informed of any changes to any of the site management documentation that is subject to regular review.
- 4.5.4 A full test (drill) of the procedures in this document will be carried out every 3-6 months to test that the plan works. The first test will take place within one month of the Environment Agency approving the site's Fire Prevention Plan (submitted to the EA as part of the Environmental Permit application). The outcome and any follow-up training for staff will be documented in the site diary and relevant forms in the EMS. The Fire Checklist will also be used during the drill. Details of an in-house inspection sheet for a fire drill are shown in Appendix II and following previous drills, on average all staff members can be at one of the

two assembly points within 2 minutes.

## 5 Quarantine area

### 5.1 General

- 5.1.1 The largest waste stockpiles on site will be within the 40yd<sup>3</sup> RORO containers which will form a mixture of combustible and non-combustible wastes and will total a volume of less than 30.6m<sup>3</sup> if stored at full capacity
- 5.1.2 The quarantine area shown on Drawing No. PUN/SRP/01 measures 3000m<sup>2</sup> and could hold at least 10 RORO containers. The quarantine area will be clearly marked out using paint to ensure operational staff can keep it clear and maintained.
- 5.1.3 If a fire broke out in a container or in the reception pile, nearby containers will be moved to the quarantine area to reduce the spread of fire.

## **6 Detecting fires & response procedures**

### **6.1 Fire detection procedure (manual)**

6.1.1 If a fire is detected or suspected by a member of staff during operational hours, it must be immediately reported to the site manager, TCM or fire marshal. The relevant person will then conduct the following procedure:

- a) Raise the fire alarm (if not already done so by another staff member).
- b) Initiate evacuation of staff and visitors on site to the meeting point and instruct delegated person(s) to conduct a roll-call to ensure all site users are accounted for.
- c) 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.
- d) If viable and safe, instruct necessary site staff to commence extinguishing the fire.
- e) If viable and safe, instruct necessary site staff to commence moving nearby combustible waste containers into the quarantine area.

### **6.2 Out of hours fire detection (automated)**

6.2.1 The site has 24 hour CCTV system. The site also benefits from the presence of a 24 hour security guard.

### **6.3 Fire response procedures**

6.3.1 Further to the above measures, the following procedure would apply if a large fire is detected during operational or out-of-hours:

- a) Call the Fire Response Service (FRS) immediately using 999.
- b) Call the EA's Emergency Contact Number.
- c) Prior to the FRS arriving, inform all neighbouring premises likely to be affected.
- d) 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.
- e) Ensure access routes are clear.

- f) If safe to do so, the TCM or a senior member of staff will inspect the location of the fire, to identify immediate risks to surrounding premises and the FRS.
- g) If safe to do so, instruct necessary site staff to commence moving nearby combustible waste containers into the quarantine area. If not, ensure operators of appropriate machinery are standing by in a safe location to help, under the direction of the FRS when they arrive.
- h) The site manager / TCM will identify themselves to the fire service as soon as they arrive on site 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.

6.3.2 In the event of the site manager or TCM being absent from the site, the operator will ensure a suitable person is employed and familiar with the site.

## **6.4 Notifying nearby properties**

6.4.1 The nearest receptors within 150m of the site i.e. other users of the Industrial Estate will be informed of the fire by employees of the operator and the FRS, Local Council and EA will be contacted to ensure further properties are informed should the fire become problematic i.e. local business, houses.

## 7 Suppressing fires & firefighting techniques

### 7.1 Internal suppression/alternative measures

7.1.1 It is not proposed to install an automated fire suppression system inside the building due to the following alternative measures:

- a) The building storing these piles is open fronted providing full access to the piles / containers for fire-fighting.
- b) The maximum duration of storage in the Units is <1 week which is significantly below the 3 month limit specified in the Environment Agency guidance. The risk of self-combustion or deep-seated fires is therefore very low.
- c) The waste stored in these containers will have been sorted and no unsorted and non-containerised waste will be present at the end of the day, meaning that there will be no hot loads or incompatible wastes which would result in a fire breaking out accidentally.
- d) The site has access to a number of on-site suppression measures which can be deployed in the event of a fire as an immediate response following the alarm being raised and the mobilisation of appointed fire contact(s) (if safe to do so). These are described further in the section below.
- e) The site has access to large amounts of non-combustible inert waste which can aid as additional suppression to water.

### 7.2 Site-wide suppression (including covered area)

7.2.1 Fire extinguishers will be located at frequent intervals around the site which can be deployed in the event of an incident to tackle the fire or for fire suppression in the intervening time between discovery of the fire and the arrival of the FRS.

### 7.3 Access for emergency services

7.3.1 The nearest fire station is Hillingdon Fire Station which is situated 3km from the site. It is calculated that the FRS could be at the site and begin fighting a fire within 12 minutes of a call.

7.3.2 The site has direct access into the site from Tavistock Road and the width of the surrounding roads and the gateway provide sufficient access onto the site for the FRS.

## 8 Water supplies

### 8.1 General

- 8.1.1 Section 16 of the Environment Agency's FPP mentions the site should have enough water available for firefighting to take place and to manage a worst-case scenario. A worst-case scenario would be the largest waste pile catching fire.
- 8.1.2 Based on the above scenario, the largest waste mass on site would be a 40yd<sup>3</sup> RORO container which measures 30.6m<sup>3</sup> when at full capacity. Assuming all waste in the container is combustible, extinguishing a fire in such a container would require 36,720 litres (37m<sup>3</sup>) of water for a minimum of 3 hours which equates to 12,400 litres per hour; 204 litres per minute.

### 8.2 On-site water supply

- 8.2.1 The site has no mains water supply but will benefit from the supply of large fire extinguishers at a spacing of no more than 10m apart.

### 8.3 Off-site water supply / fire hydrants

- 8.3.1 London Fire Brigade (LFB) were contacted in the preparation of the site's FPP review with a view to obtaining details regarding the nearest hydrants in the proximity of the site and also their projected water supply in the event of an incident. The site is bounded by railway lines on all sides and no fire hydrants are located within this boundary, however, the site is located just 130m from Frays River and the river runs within the railway track boundary and can therefore be accessed without obstruction.

### 8.4 Additional / alternative suppression measures

- 8.4.1 Fire extinguishers will be placed around the site at a spacing of no more than 10 metres apart. These can be deployed in the event of a smaller fire incident for fire suppression.
- 8.4.2 As well as using on-site firefighting equipment, there is access to significant amounts of non-combustible inert soil / hardcore material which could be used to smother a fire using the site plant. Utilising 'dry' firefighting techniques will reduce the need for water use in tackling a fire on site which would therefore reduce the volume of potentially polluting firefighting

residues requiring disposal following an incident.

## **9 Managing fire water**

### **9.1 Drainage**

9.1.1 The floor of the building will be surfaced with impermeable concrete. There will be at least a minimum of 150mm curbing around all perimeters to ensure the site benefits from a sealed drainage system.

### **9.2 Containment of fire water**

9.2.1 Using the above containment technique, the containment area will measure approximately 900m<sup>2</sup> and as the site benefits from a minimum of 150mm curbing, this area could contain 135m<sup>3</sup> of firefighting water.

9.2.2 A fire in the largest waste mass would require containment for less than 37m<sup>3</sup> of water in accordance with the Environment Agency's FPP guidance.

### **9.3 Removal of fire water**

9.3.1 Upon successfully extinguishing a fire all standing fire water would be pumped using a hired-in vacuum tanker and transported off-site to a suitably permitted site for treatment. No firewater would be discharged into sewers.

## 10 After an incident

### 10.1 Contingency Planning

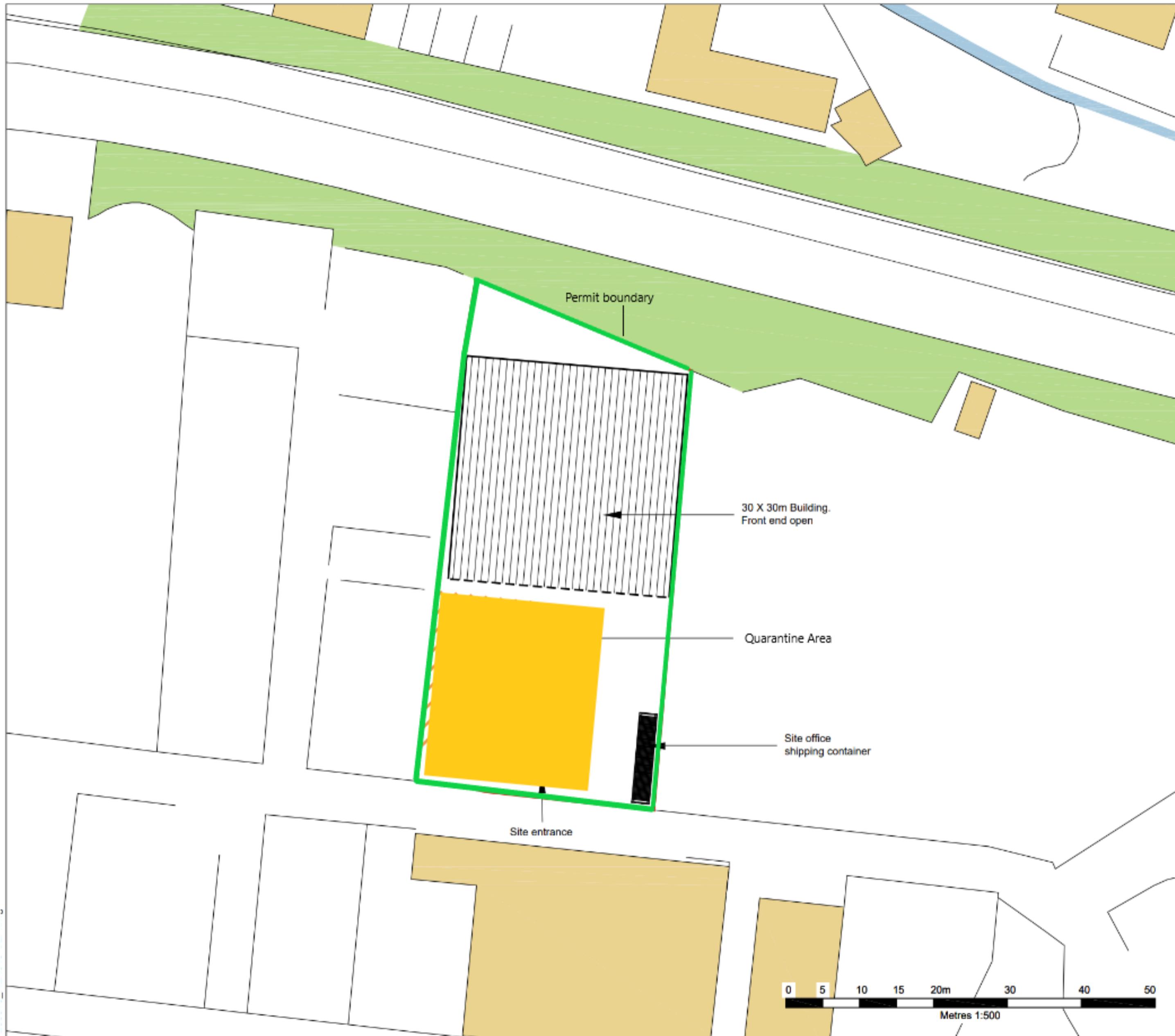
- 10.1.1 In the event of a fire, the site will cease accepting waste. All customers who wish to deliver wastes during a fire will be notified by site admin staff and any who arrive without prior notification will be turned away. If urgent, deliveries will be directed to an alternative waste facility.
- 10.1.2 No waste will be accepted on site until the post-fire site recovery procedures outlined in the section below have been fully implemented and the site is authorised to re-open for trade and waste acceptance.

### 10.2 Post fire site recovery

- 10.2.1 If a recovery procedure is required, the operator would instigate the following;
  - a) Remove damaged material to a permitted facility that is able to deal with it legally.
  - b) Ask engineers to carry out repairs on any plant, vehicles and/or infrastructure.
  - c) Assist the FRS with the fire investigation and where necessary engage the advice from a professional fire consultant.
  - d) Review the FPP and EMS procedures and improve upon where found deficient.
  - e) Review training requirements for staff.
  - f) Assess whether further preventative measures could be implemented.
  - g) Ensure all fire equipment, where used, is replenished.
  - h) Remove fire water to a permitted facility for disposal.

## **Appendix I**

### **Drawings**



**Heatons**  
Planning Environment Design

**SITE**  
**Old Coal Depot**

**PROJECT**  
**Waste Transfer Station**

**DRAWING TITLE**  
**Site Layout Plan**

**DATE** Aug 2023 **REFERENCE** SLP

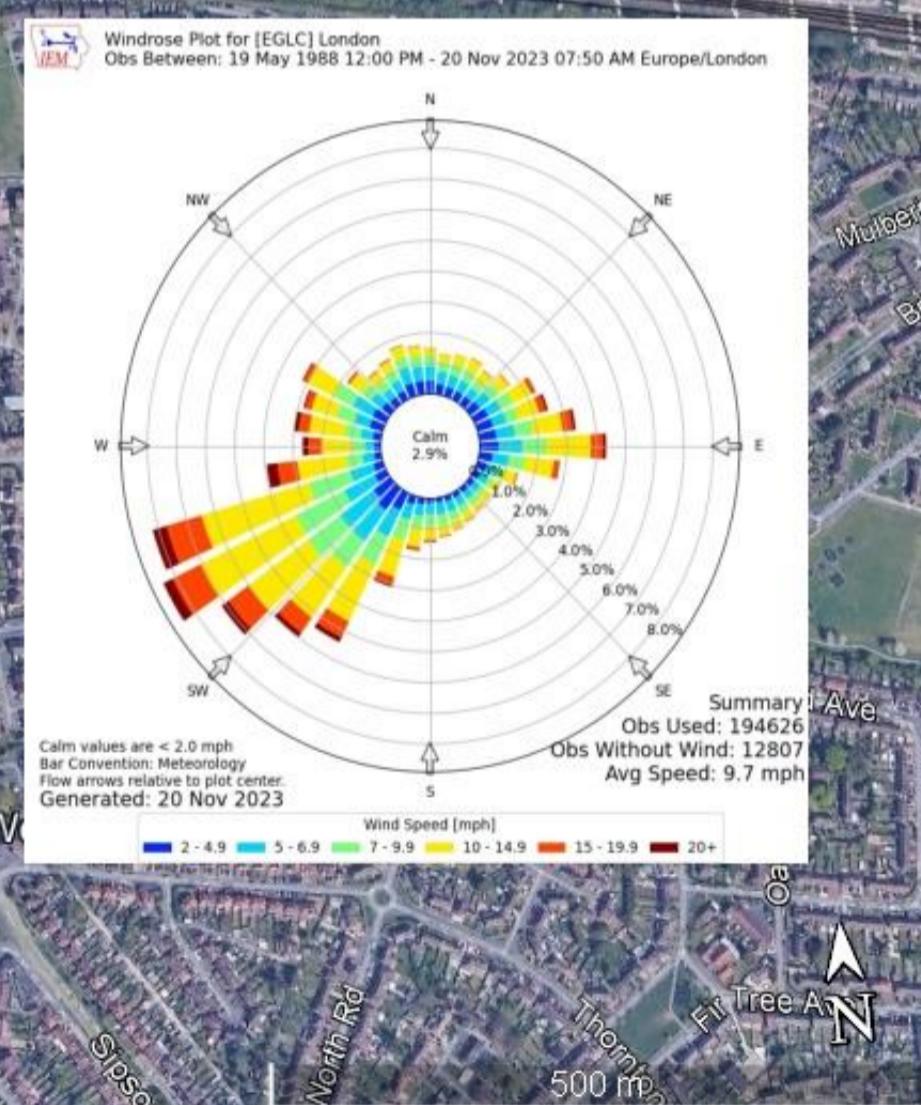
**SCALE** 1:500 @ A3

**STATUS** FINAL

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## Punjab Skips (PUN/SRP/02)

Sensitive receptors within 1km of site



## **Appendix II**

### **Record Keeping Forms**

**PUNJAB SKIP HIRE LTD**  
**SITE INSPECTION FORM (MINIMUM TWICE DAILY)**

DAY							
TYPE OF INSPECTION							
TIME OF INSPECTION (START)							
TIME OF INSPECTION (FINISH)							
SITE ENTRANCE/NOTICE BOARD							
SECURITY - GATES							
SECURITY - FENCING							
SITE ROADS (CLEAR FROM HAZARDS)							
IMPERMEABLE CONCRETE AREAS (INTEGRITY)							
BUND AROUND CONCRETE PAD (INTEGRITY)							
INTERCEPTORS							
WASTE CONTAINERS & BAY WALLS							
WASTE STORAGE LIMITS	INERT						
WASTE STORAGE LIMITS	BIODEGRADABLE						
WASTE STORAGE LIMITS	COMBUSTIBLE						
COMBUSTIBLE WASTES (AWAY FROM POTENTIAL IGNITION SOURCES)							
REJECTED WASTE TYPES / STORAGE							
NOISE LEVELS							
FIRES (ANY INCIDENTS REPORTED)							
QUARANTINE AREA CLEAR OF WASTE							
NO SMOKING SIGNS IN PLACE							
FIRE FIGHTING EQUIPMENT							
FIRE BREAKS IMPLEMENTED							
PLANT/EQUIPMENT MAINTENANCE CHECKS							
HOT EXHAUSTS FIRE WATCH (DUST/FLUFF CLEANED REMOVED)							
SPILLAGES OF OIL/LIQUIDS CLEARED							
OFFICE/WELFARE FIRE RISKS CHECKED							
ELECTRICAL APPLIANCES AND CABLING CHECK							
FUEL TANK/BUND							
LITTER							
DUST							
ODOUR							
VERMIN							
RECORDS							
COMPLAINTS RECEIVED							
OTHER (SEE NOTES BELOW)							
INSPECTION CARRIED OUT BY							
<b>NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):</b>							
CHECKED BY				SIGNATURE			
POSITION				DATE			
Sheet				of			

## PUNJAB SKIP HIRE LTD - PREVENTATIVE MAINTENANCE CHECKLIST

CHECKED BY	POSITION
DATE	DATE OF LAST CHECKLIST

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

