

Management and storage of combustible recyclable and waste materials - indoor storage guideline

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Foreword

The safe storage and management of combustible recyclable and waste materials is an increasing challenge for industry, the wider community and emergency services. Indoor storage of waste materials requires due diligence from site owners and occupiers to ensure that fires do not occur and, if they do, that their consequences are minimised.

The information in these guidelines is intended to help owners and operators of facilities where combustible recyclable and waste materials (CRWM) are stored or processed indoors, understand the legislative requirements relating to indoor storage. The guidelines set out the expectations of the fire services for meeting the obligations and practical measures to minimise fire risk and to facilitate the timely intervention of the fire services.

It is important that people who own or operate these facilities are fully aware of their legislative obligations and take the necessary measures to ensure fire safety within their premises. This minimises health and safety risks to employees, firefighters and the broader community and environmental risks associated with fire and makes good sense from a business perspective. Victoria's fire services invite key stakeholders to consider these guidelines and work together to maintain and improve fire safety.



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Purpose

These guidelines:

- advise building owners, occupiers and operators of waste and resource recovery facilities (WRRF) in Victoria how to store combustible recyclable and waste materials (CRWM) indoors.
- supplement EPA's *Management and Storage of Combustible Recyclable and Waste Materials Guideline* (Publication 1667.2, October 2018).

'Indoors' means any facility that processes and/or stores CRWM in any fully or partially enclosed building, warehouse, shed, hangar or other structure.

As the ongoing legal occupation of a building is governed by the planning permit, building and occupancy permits issued, any changes in the type of occupancy, such as the storage of CRWM, will directly impact the building's approval under Victorian building legislation, the National Construction Code (NCC) and relevant local planning requirements. Additionally, changes to building use will require duty holders to assess their work practices and risk controls to ensure they continue to meet their obligations under the *Occupational Health and Safety Act 2004*.

These regulatory frameworks outline the minimum requirements for the safety of people working in them, including their ability to safely evacuate in the event of fire. They do not provide an exhaustive list of requirements or recommendations to prevent fire occurring.

As well as using these guidelines it is recommended that the building owners, occupiers or operators engage suitably experienced practitioners such as a building surveyor, risk engineer, fire services engineer and fire safety engineer to address not only the building compliance aspect but also using the building as a WRRF, prior to construction, leasing or occupation.

Any new construction of a building to be used as a WRRF will require a building permit which may be issued by a Municipal Building Surveyor (MBS) or a Private Building Surveyor (PBS). Due to the special hazards presented by the storage of CRWM indoors, it is also likely that a building permit will be required to change the use of any existing building.

An owner, occupier or operator must not change the use of an existing building unless the building complies with the building regulations applicable to the new use and a building must not be occupied in contravention of the permitted use and class of occupancy specified in the occupancy permit applicable to the building. A building permit is required for any building work relating to alterations or additions/extensions to a building, which includes the installation of, removal of, or alterations to any essential safety measure.

Where an existing building is permitted to be used as a WRRF, but the occupancy is limited to a particular use and not for the storage of CRWM, an MBS or Relevant Building Surveyor (RBS) are the only statutory authorities permitted to amend an occupancy permit. Any owners, occupiers or operators must apply for an amended occupancy permit to ensure the building complies with the *Building Act 1993* and the building regulations (which includes the Building Code of Australia [National Construction Code] and referenced Australian Standards).

- When using a building for the storage of CRWM, Victorian Government agencies expect that an assessment of the building is carried out to ensure the building and the essential safety measures installed in the building are fit and operational for the intended purpose, eg storing/processing.
- The current National Construction Code and Australian Standards provide a benchmark when assessing and subsequently designing the fire safety and essential safety measures systems and equipment.

Victorian Government Authorities - Roles and Responsibilities

Local Government (Councils)

Councils are responsible for the administration and enforcement of parts 3, 4, 5, 7 and 8 of the *Building Act 1993* and the Building regulations within their municipal district (*Building Act s212*). Councils implement this through appointing a Municipal Building Surveyor. The Municipal Building Surveyor has various duties, functions and powers under the Act to administer and enforce compliance with the Act and the regulations. This includes powers to inspect buildings and issue notices and orders. Other powers under the Act may be authorised or delegated to them by council. This may include the power to bring proceedings for offences under the Act or Regulations.

Councils are also responsible authorities for their municipal district under the *Planning & Environment Act 1987*. Responsible authorities have a duty to administer and enforce the planning scheme within their district (*Planning and Environment Act s.14*). This includes consideration of permit applications for land use, as well as the enforcement of permits and conditions. Enforcement may include issuing infringement notices, seeking enforcement orders through the Victorian Civil and Administrative Tribunal, and prosecuting offences under the Act.

Councils also have powers under other Acts including local laws established under the *Local Government Act 1989* and nuisance provisions under the *Public Health and Wellbeing Act 2008*. These provisions generally deal with smaller scale amenity issues.

Victorian Building Authority (VBA)

The Victorian Building Authority (VBA) regulates Victoria's building and plumbing industries to ensure a quality-built environment in Victoria. Relevant legislation administered by the VBA includes the *Building Act 1993* and the *Building Regulations 2018* which adopt the National Construction Code and referenced Australian Standards.

The VBA's functions include:

- registering, licensing and disciplining building and plumbing practitioners in Victoria;
- providing expert technical advice and informed solutions to industry;
- working with other agencies and regulators to ensure building and plumbing practitioners are compliant and that consumers are protected; and
- overseeing the work of building surveyors and Victoria's building permit system.

The VBA's role in regulating the indoor storage of CRWM in a WRRF is to oversee building and plumbing practitioner conduct and provision of technical advice concerning building and plumbing work.

WorkSafe

WorkSafe is Victoria's workplace health and safety regulator and aims to ensure that every Victorian worker returns home safe from work every day.

WorkSafe administers the *Occupational Health and Safety Act 2004* (OHS Act), the *Dangerous Goods Act 1985* (DG Act) and related regulations. WorkSafe encourages compliance through providing guidance and information to duty holders, whilst deterring health and safety contraventions through compliance monitoring and enforcement activity.

To monitor compliance WorkSafe may inspect workplaces and work with employers and employees to ensure that the risks to health and safety of storage of CRWM indoors are reduced, so far as is reasonably practicable.

Fire Services - Country Fire Authority (CFA) and Metropolitan Fire Brigade (MFB)

Victorian fire services, CFA and MFB, have legislated responsibilities for the prevention and suppression of fires, and for the protection of life and property in the event of fire. The fire services prevention responsibilities include the provision of specialist advice and support to regulatory authorities (councils, EPA, Victoria Building Authority (VBA) and WorkSafe) and where appropriate, occupiers/duty holders, regarding fire protection and emergency planning as it relates to special hazards for firefighting at WRRF. The fire services suppression responsibilities include responding to calls for assistance at WRRF located within Victoria and taking the necessary steps to suppress fire, assist people, and protect property.

Environment Protection Authority (EPA)

EPA's role in regulating indoor storage of CRWM at WRRF is to ensure duty holders take all reasonable steps to reduce environmental and human health risk arising from fire in accordance with the Waste Management Policy (CRWM) 2018 (WMP CRWM) or the relevant regulatory tools under the *Environment Protection Act 2017* as amended by the *Environment Protection Amendment Act 2018*.

EPA works closely with the relevant fire authorities, planning compliance officers, municipal building surveyors and WorkSafe on indoor CRWM storage compliance and enforcement activities. EPA's authorised officers can enter an WRRF to assess compliance (of a site's risk and emergency management plan) against the WMP CRWM and the *Management and Storage of CRWM Guideline* (EPA publication 1667.2). EPA may issue remedial notices to WRRFs that do not comply with the WMP CRWM or the relevant regulatory tools under the *Environment Protection Act 2017* as amended by the *Environment Protection Amendment Act 2018*.

Consultation

Operators who:

- plan to store CRWM indoors must liaise with all relevant authorities and stakeholders at the planning and/or design stage for new storage sites as part of the risk management process
- have an existing WRRF must:
 - review the design and performance of their facility in line with the advice in these guidelines
 - seek advice from the relevant authorities where there are discrepancies with existing practices compared with these guidelines
 - undertake a detailed risk assessment to ensure robust mitigations are in place.

The relevant authorities include:

- Municipality – including the Municipal Building Surveyor (MBS), Planning Department
- relevant building surveyor (RBS)
- Environment Protection Authority (EPA)
- WorkSafe
- relevant fire authority.

An employer may also have other consultation obligations under the OHS legislative framework, for example a duty to consult with employees.

Risk Management

The risk associated with WRRF needs to be adequately managed. The utmost importance is to be placed on safety, intervention activities and the environment. As such, the provision of additional fire protection systems is necessary to minimise the risk on occupants, adjoining properties, employees, the general public, firefighters and the environment.

A robust risk assessment process must be undertaken, regardless of whether the building used for the storage and/or processing of CRWM is new or existing. The risk assessment process must be to the satisfaction of the EPA, WorkSafe, local government and the relevant fire authority.

The process is to include:

- hazard and risk identification, analysis and evaluation
- identification and implementation of effective preventative and risk controls
- review methods to ensure risks continue to be controlled so far as is reasonably practicable and to identify circumstances where risk controls may need to be changed or supplemented.

A fire risk assessment is to be:

- performed as part of the overall risk management process. It is recommended that this process be completed by a suitably qualified person such as a fire engineer or risk engineer
- informed by fire safety studies that include fire, emission and dispersion modelling to determine possible off-site impacts of toxic products of combustion.

The outcomes of the risk management process:

- provide the foundation for effective emergency and fire management planning
- inform requirements for arrangement of CRWM indoors, fire protection systems, resourcing (personnel, plant and equipment), site fire water containment, and site activities (including receipt, vetting, sorting, storage, processing, packing and dispatch, among others)
- must meet occupational health, safety and environmental requirements for eliminating or reducing risk so far as is reasonably practicable.

Planning

The Victorian planning system exists so that fair and transparent decisions, consistent with the planning rules, can be made. Each municipality in Victoria is covered by a planning scheme that regulates use and development.

Before seeking a planning permit, land or building owners should talk to the relevant council to ensure that a planning permit is required. Prior to submitting a permit application, the applicant should discuss the proposal with council. Council may then refer the application for specialist advice to inform their decision.

Building and Design

The National Construction Code (NCC) provides the minimum requirements for health and safety, amenity, accessibility, and sustainability in the design, construction, performance and liveability of new buildings (and new building work in existing buildings) throughout Australia.

A robust building assessment is to be carried out, to inform the required fire suppression capabilities and other items such as an emergency management planning to ensure that the building and the installed protection systems are fit for purpose and mitigate the associated risk within the building.

Under the OHS Act, a person who is a designer of buildings or structures, or parts of buildings or structures, must ensure, so far as is reasonably practicable, that the building or structure or the part of the building or structure that is to be used as a workplace, is designed to be safe and without risks to the health of people using it as a workplace for a purpose for which it was designed.

Combustible waste should be considered as a special hazard, as such the review process should be holistic of the building design and performance of the facility with respect to NCC compliance, inclusive of Clauses E1.10 and E2.3. It is the responsibility of the risk engineer, fire services engineer and fire safety engineer to design a facility that is suitable for its intended use and in compliance with the relevant legislation and NCC performance requirements.

For simplification in designing for special hazards, the following surface burning temperatures and fire risk rating should be applied to stockpiles of common combustible waste materials, as given in Table 1¹.

Type of waste material	Burn temperature	Fire risk
Paper and cardboard	850°C	Ordinary
Wood products	860°C	Ordinary
Plastic	1,200°C	High
Rubber	1,130°C	High
Refuse derived fuels	900°C	Ordinary
Solid recovered fuels	950°C	Ordinary

Table 1: Typical burn temperature and fire risk of combustible waste material.

Where a stockpile contains a mixture of combustible waste materials, the burn temperature and fire risk of the most predominant waste material should be used for the whole stockpile, and in the case of no clear majority then the worst-case material should be used.

Installed Building Safety Systems

While the NCC sets the minimum requirements for buildings within Victoria, the owner / occupier should undertake a robust risk assessment process that will identify the risk within the building and the required fire protection systems to mitigate that risk. This is due to the special hazards presented with the indoor storage of CRWM of which the NCC Deemed-to-Satisfy Provisions do not specifically address.

Subsequently any design which provides a solution to mitigate the inherent risks presented by the special hazards must be developed by a suitably experienced practitioner and meet the relevant performance requirements of the NCC. For further guidance on development and documentation of performance solutions visit the VBA website to obtain a copy of Practice Note 63 *Performance Solution Procedures and Documentation*.

Fire Detection and Alarm Systems

Depending on the assessment by a RBS of a special hazard, it is likely that a smoke detection and alarm system will be required. The NCC stipulates the requirements for these systems and should be referenced when deciding if a system is required.

¹ Waste Industry Safety and Health Forum, *WISH INFO 05 Waste fire burn trials summary non-technical report version 2*

Due to the hazards associated with the storing and processing of CRWM within buildings, a smoke and/or heat detection and alarm system, that is fit for purpose, should be installed within any building that stores or processes CRWM. An installed smoke detection system must be connected to the relevant fire authority to enable early notification of an incident on site.

Fire Protection

The requirements for the installation of fire protection systems are within the NCC for new or existing buildings built on or after 1 August 1997. (Note: the year the building was designed and built will indicate the year of NCC/BCA to be referenced).

Clause E1.3 of the NCC references AS 2419.1 'Fire hydrant installations – System design, installation and commissioning' in relation to the installation requirements for hydrant systems for a building. The Standard sets the performance requirements for the system along with the infrastructure that will be required, depending on the size and classification of the building.

This guideline recommends that the design of the fire hydrant system is to have enhanced standard of performance when combustible waste material is not protected by a fire sprinkler system, including having an additional fire hydrant outlet required to flow simultaneously for any open yard storage and for any non-sprinklered internal stockpiles, as given in Table 2.

Fire compartment floor area of non-sprinklered building	Area of open yard (used for stockpiles)	No. of fire hydrants required to flow
≤ 500 m ²	≤ 3,000 m ²	2
> 500 m ² ≤ 5,000 m ²	> 3,000 m ² ≤ 9,000 m ²	3
> 5,000 m ² ≤ 10,000 m ²	> 9,000 m ² ≤ 27,000 m ²	4
> 10,000 m ²	> 27,000 m ²	5 (or more)

Table 2: Minimum fire hydrants for non-sprinklered buildings and external storage.

Note: Refer to E1.3 and Australian Standard AS 2419.1 for fire hydrant system design requirements of building.

Automatic fire sprinkler systems

This guideline recommends that any waste facility is to have an automatic fire sprinkler system installed in buildings that have a floor area greater than 1000 m² and which contain combustible waste material.

Note: Unsorted mixed combustible waste material generally presents a greater ignition hazard than most other combustibles.

The fire sprinkler system should be demonstrated as being appropriate to the risks and hazards identified for buildings, including externally as necessary (eg drenchers to protect plant/equipment, exposures, high-risk external storage).

The fire sprinkler system design should be appropriate to the hazard class (eg 'high hazard class') and have enhanced standard of performance as appropriate to the special hazard.

Note: Any system design limitation set by specifying content and percentages are to be maintained for the building's operating life unless the system is upgraded.

To protect vital systems, storages or equipment or protect against high risk hazards, a deluge, drencher, fast response, mist or foam system should be provided.

Note: A localised system may be installed to protect specific areas or equipment if the whole building is not sprinkler protected.

The fire brigade booster assembly for the fire sprinkler system should be co-located with the fire hydrant system booster within sight of the designated site entry point, or in a location approved by the fire brigade.

The fire sprinkler system is to have a minimum water supply and capacity providing the maximum hydraulic demand (ie flow rate) for not less than two hours.

Note: The fire sprinkler system should contain fire spread and allow firefighters to enter the building, remove burning waste material and extinguish the fire.

Water Supply

Water supply is a significant issue for fires in CRWM facilities. Current fire service data suggests that responding fire brigades have used much more water than that required by the NCC and Australian Standards.

- The firefighting water supply is to be designed to meet the demands of the fire sprinkler and fire hydrant systems operating simultaneously.
- The amount of static water (if no adequate town main supply is available) is to be commensurate to the risk within the site. This should be determined by the risk assessment process.
- Any on site water infrastructure to be as per the Australian Standard.

Smoke Hazard Management

The NCC sets the requirements for Smoke Hazard management under Part E2. Clause E2.3 relates to smoke hazard management where special hazards are present.

Automatic smoke hazard management systems for indoor storage and/or processing of CRWM are to be designed appropriate to the potential risk within the building.

Site Containment of Contaminated Firewater

Protecting the environment is a fundamental activity that should be considered by all owners/occupiers of buildings that store and/or process CRWM. Primary containment such as bunds, catchment pits or other methods for containment of surface run-off are to be provided at the facility. Secondary containment for CRWM contaminated storm water or firefighting water is also to be provided.

Containment measures are to:

- have a capacity based on credible worst-case scenario fire water output
- be designed with consideration to EPA's 'Liquid storage and handling guidelines' (Publication 1698, June 2018).

Access for Fire Service Vehicles

CP9 fire brigade access, within the NCC stipulates that access must be provided to and around a building, to the degree necessary, for fire brigade vehicles and personnel to facilitate fire brigade intervention.

While both CP9 and C2.4 are the minimum requirement from the NCC for a large isolated building, it is understood that this is not a 'one size fits all' approach and this requirement will need to be assessed on a site-by-site basis.

Facility Operation

Maintenance

When the construction, alteration or addition/extension of a building is complete, the building owner is responsible for its upkeep and maintenance, particularly its safety features or Essential Safety Measures.

The maintenance of Essential Safety Measures will ensure that important safety systems and equipment in relation to a building remain at the required operational level throughout the life of the building. The type of maintenance needed depends on the complexity of the safety measure, equipment or feature and the maintenance program required or expected at the time of installation. Such information will be determined by the RBS and specified on the Occupancy Permit.

Owner/occupiers should refer to the Victorian Building Authority's website for further information on Essential Safety Measures, see references at the end of these guidelines for relevant links.

Ignition Source Control

Ignition sources have been identified as a real risk to operators of CRWM sites. Fire services have responded to numerous fires that have started from ignition sources such as plant and equipment as part of the operation or due to work practices that introduce unnecessary risk to the site. Operators must identify and control ignition sources on site, which in turn will reduce the risk of fire within the facility.

Recommended way to control the risks include:

- hot work permit procedure for all cutting, welding, grinding and similar activities
- maintenance of plant and equipment on an ongoing basis as per manufacturer's servicing specifications
- regular inspection of electrical equipment, vehicles, machinery, etc.
- any designated smoking areas are to be situated at least 10m from buildings
- the use of non-heat generating lights (eg LEDs)
- ensuring that security on site is maintained including:
 - security patrols
 - ensuring that boundary fencing is intact at all times.

All control measures require review and maintenance to ensure they are appropriate and effective. Vehicles, plant and equipment used in indoor areas of WRRF are to be carefully considered due to the risks associated with exhaust, heat, sparks and fuel storage.

Indoor Processing Activities

Operators are obligated under the OHS Act to identify and control risks associated with indoor processing activities so far as is reasonably practicable. Indoor processing activities include receipt, dismantling, shredding, baling, decomposing, compacting, sorting and dispatch of CRWM.

Regular maintenance and housekeeping is critical to controlling such risks, including:

- maintenance of plant and vehicles which is to be undertaken according to manufacturer's requirements or more frequently as determined by the risk management process.
- a high level of housekeeping to be maintained to ensure loose materials and dust are removed at least daily from processing plant.

The appropriate amount of CRWM stored indoors must be determined by the site's risk assessment considering variables such as the building size/layout, compartmentation, installed safety systems and other fire controls, process equipment and plant, etc.

In a building fitted with an automatic fire sprinkler, the maximum amount of CRWM stored indoors should be 1,000m³. If adhering to the storage dimensions and distances described in this document is not possible at your site, you may be required to demonstrate how your alternative storage design minimises the risk from fire to at least an equivalent level, while still meeting the requirements of the relevant regulations. A fire safety engineer may be able to assist you with this.

In a building not fitted with an automatic fire sprinkler system, the maximum amount of CRWM stored indoors should be limited to a volume that can be moved to the dedicated external quarantine area using on-site resources only within one hour or less.

Note: For example, two waste handlers with 5 m³ bucket capacity taking two minutes per return trip can move a 300 m³ stockpile in an hour (ie 2 x 5 m³ x 30 trips).

Internal stockpiles may be located side by side when separated by a masonry wall. If stockpiles are not separated with a wall, they should have a minimum of 6 m unobstructed access on each accessible side in a building fitted with an automatic fire sprinkler system, or 10 m in a building not fitted with an automatic fire sprinkler system (see Figure 1).

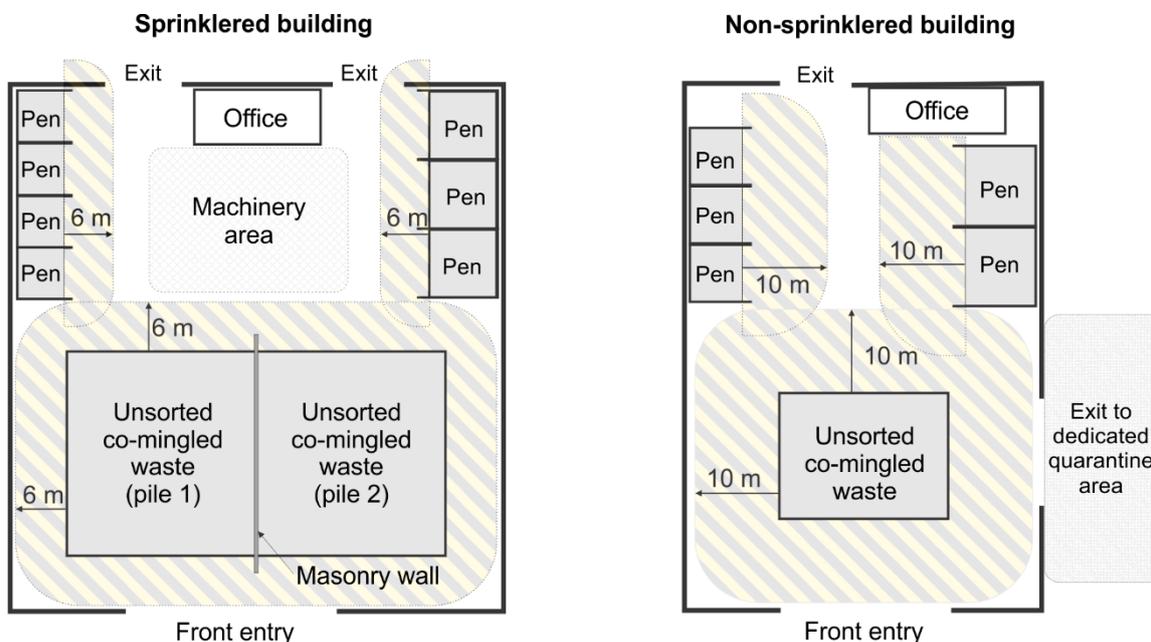


Figure 1 Example of unobstructed access around internal stockpiles.

Internal stockpiles should be protected from high or unnecessary ignition risks (eg friction/heating from conveyors, waste movers, heaters, chippers, shredders, balers, sorters, other machinery, etc.)

Internal stockpiles should be maintained so that all building egress points and required paths of travel are not blocked or impeded at any time.

Internal stockpiles should be maintained so that access to the dedicated external quarantine area is always kept clear and unobstructed (ie by waste handlers).

Note: Any door opening (eg roller door) providing access to the quarantine area must be able to be readily opened at any time, including when power is lost.

Fires can be prevented through the effective management of indoor processing activities.

Effective Storage Management

Operators are obligated under the OHS Act to identify and control risks associated with the volume and arrangement of CRWM stored indoors so far as is reasonably practicable. Control measures include:

- establishment and maintenance of separation distances of CRWM to:
 - Roof Mounted Sprinkler heads
 - Building walls
 - Fire protection equipment
 - Building exits
 - Paths of travel
 - Storages of dangerous goods, flammable or combustible materials
 - Hot works, including processing activities
 - CRWM processing equipment
- site practices (eg standard operating procedures) that ensure piles of CRWM do not encroach separation distances
- ensuring storages of dangerous goods are in accordance with dangerous goods legislation
- restricting the use of liquid-fuelled vehicles indoors
- a high level of housekeeping that ensures that loose materials are removed at least daily
- the use of floor markings that delineate:
 - CRWM storage areas
 - paths of travel to exits
 - clearance around fire protection equipment.

The potential for fire spread can be reduced through effective storage management.

Occupational Health and Safety

Under the OHS legislative framework, employers must provide and maintain a working environment that is safe and without risks to the health of employees and contractors. This includes identifying risks to health or safety and eliminating or reducing those risks, so far as is reasonably practicable.

Further, employers must:

- so far as is reasonably practicable, provide and maintain plant and systems of work that are safe and without risks to health
- ensure, so far as is reasonably practicable, that people other than employees are not exposed to risks to their health or safety arising from the conduct of the employer's undertaking
- provide employees and contractors with such information, instruction, training or supervision as is necessary to enable them to do their work in a way that is safe and without risks to health

Emergency Preparedness

Emergency Management Plan

An emergency plan specifies procedures for handling sudden or unexpected situations. The objective is to be prepared to:

- prevent fatalities and injuries
- reduce damage to buildings, stock, and equipment
- reduce impact to the environment and to the community.

Operators are required to develop an emergency plan by the Waste Management Policy (Combustible Recyclable and Waste Materials) 2018. Emergency Management Plans are to be made available for all agencies upon request.

Emergency Equipment

Operators are to:

- identify on-site equipment that could assist in containing and managing emergency incidents
- make arrangements with suppliers to obtain equipment that is not available on-site
- develop deployment procedures for emergency equipment during emergencies.

Where emergency equipment includes forklifts, operators:

- are to be trained in the use of Self Contained Breathing Apparatus (SCBA)
- should ensure that sufficient SCBA equipment is available and maintained at all times.

Fire services personnel will not operate forklifts.

All staff are to be trained in the site emergency management arrangements and the relevant emergency response procedures.

Provision of Emergency Information

The provision of emergency information to responding emergency services is a requirement of numerous Victorian regulations and Australian Standards.

An Emergency Information Book (EIB) is to be provided at site entrances, stored within an Emergency Information Container. Emergency Information Books are to be prepared in accordance with the guidance available from the fire services.

<https://www.cfa.vic.gov.au/plan-prepare/dangerous-goods>

Emergency Information Containers are to be:

- located at all vehicle access points to the facility
- installed at a height of 1.2m - 1.5m
- painted red and marked 'Emergency Information' in white contrasting lettering not less than 25mm high
- accessible with a fire brigade standard 003 key.

References and Resources

Country Fire Authority and Metropolitan Fire Brigade Fire Services Guideline 2014, Indoor Storage of New and Used Tyres, Version 5 https://www.cfa.vic.gov.au/documents/20143/202133/Fire_Services_Guideline_Indoor_Storage_of_New_or_Used_Tyres.pdf/b70a3a23-10b0-dbad-0105-8ca4f57e3549

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