

APPENDIX 2

ACCIDENT MANAGEMENT PLAN INSTALLATION PERMIT APPLICATION

ROADWAYS WOODSIDE DEPOT



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INTRODUCTION

The Accident Management Plan supports an application for an Environmental Permit for the recovery and treatment of hazardous and non-hazardous waste at Woodside Depot, Polegate Road, Hailsham BN27 3PG. The site will be operated by Hailsham Roadways Construction Co. Limited.

As described in the Operating Techniques report (Document 3) a cold treatment process, using bitumen emulsion as a binder, will be used to treat and fully encapsulate asphalt wastes containing coal tar (AWCCT), which will be imported to the Site from highway maintenance and improvement works in the surrounding area. In addition, any soil arisings from highways contracting works that are classified as hazardous would be accepted and stored on site before onward transfer to another management facility.

The Site will also receive non-hazardous highway excavation wastes and road planings. Non-hazardous highway excavation wastes will be crushed and/or screened to recover secondary aggregates. Road planings will be stored for subsequent reuse off-Site.

The Accident Management Plan for the Permitted activities is based on:

- A risk assessment, carried out to identify potential hazards arising from the receipt, off-loading, storage, treatment and dispatch of hazardous wastes (principally AWCCT) and non-hazardous highway excavation wastes and road planings, and any possible pathways and receptors;
- Mitigation measures, designed to minimise the risk and consequences of, an accident;
- The core procedure for the prevention and management of accidents, which forms part of the operator's Environmental Management System (as detailed in the Operating Techniques report).

Environmental risks have been considered during the operational and closure phases of the facility. The treatment process is undertaken in purpose designed and dedicated sealed plant, and is well established and proven technology for the encapsulation and reuse of AWCCT. The plant can be readily decommissioned and removed from the Site once waste operations eventually cease in the future.

It is necessary to apportion a level of significance to the identified environmental risks. A risk assessment methodology, based on the requirements of H1 Annex A 'Amenity and Accident Risk from Installations and Waste Activities' (Environment Agency, December 2011), has been used to achieve this. It is based on the source pathway receptor principle and details potential risk without mitigation measures, the mitigation measures that will be used on site and the actual risk once those mitigation measures are applied.

Table 1: Accidents & Emergencies

What is the risk?			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk?
Fire or failure to contain firewater	Air transport then inhalation or deposition Groundwater and surface water. Local residents Ancient Woodlands	Infiltration and contamination of surface water	<p>The risk of fire is considered to be low as the proposed waste types are not combustible and no waste shall be burnt on site.</p> <p>The use of welding/cutting tools (tools with a naked flame) are sanctioned first by the site manager/competent person.</p> <p>All site operatives are required to recognise signs of smouldering waste at the point of reception. Such wastes shall remain in the container and removed to a safe area. The site manager shall be informed.</p> <p>There will be strict waste acceptance procedures in place at the site to prevent the acceptance of non-conforming waste types. Details of the waste acceptance procedures are provided in the Operating Techniques report.</p> <p>The operator will undertake routine maintenance of equipment in accordance with manufacturer's guidance. This will minimise the risk of mechanical failure which may result in an increased risk of combustion.</p> <p>Site notices and training will be undertaken regarding fire hazards.</p> <p>The Site Manager will be responsible for actions in the event of a fire.</p> <p>The site benefits from a positive drainage system, fire extinguishers and drainage covers to reduce the potential of fires on site.</p>	Unlikely	Contamination of local groundwater and/or surface water.	Low

Leaks and spillages of oil or fuel.	Groundwater and surface water.	Infiltration	<p>The operator does not accept liquid wastes. The operator will undertake regular maintenance of plant and equipment in accordance with manufacturer's guidance. This will minimise the risk of mechanical failure which may result in leaks.</p> <p>All fuel, oil and lubricants will be contained within bunded tanks. The tanks will be maintained and inspected in accordance with the manufacturer's recommendations.</p> <p>Daily vehicle / plant checks to ensure any fuel/oil leaks etc. are repaired as soon as possible.</p> <p>The site benefits from a positive drainage system with full retention interceptors and holding tanks with a shut off valve to retain spillages and prevent them from entering the foul drainage system.</p> <p>The drainage scheme for the development uses SUDS features positioned in a cascading configuration: a settlement pond, swale and geocellular crates. Sediments would accumulate in the pond which is visually inspected regularly and cleaned/maintained as necessary.</p> <p>The Site Manager will be responsible for ensuring effective remediation and documenting any incident.</p>	Unlikely due to measures in place.	Contamination of land and watercourses.	Low
Flooding	Groundwater.	Infiltration and Percolation	<p>The site is not located in an area at risk of flooding from rivers or surface waters.</p> <p>Hazardous waste is managed and stored on an impermeable concrete surface with a sealed drainage system.</p> <p>The waste stored onsite is unlikely to cause contamination of groundwater through infiltration as the proposed waste types likely to cause pollution will be covered when stored and the underlying geology is clayey soils; a highly impermeable material. Due to the</p>	Unlikely due to measures in place and the nature of the proposed development.	<p>Disruption to works operations</p> <p>Contamination of local groundwater and/or surface water</p>	Low

			nature of waste types which are proposed to be treated, if surface water comes into contact with these wastes, significant pollution or contamination of groundwater or surface water is considered unlikely.			
Vandalism	Groundwater Local human population in residential dwellings and commercial and industrial properties and ancient woodlands listed in Table 2	Unauthorised entry to the site	The site is gated with CCTV and is surrounded by security fencing and vegetation. Access to the waste area will be restricted to trained depot staff. Any identified damage to the gate and the perimeter fence that could compromise the site security will be recorded and temporarily repaired as necessary before the end of the working day. Permanent repair or replacement will be undertaken as soon as practicable. Procedures are in place which require all visitors to the site to sign in on arrival and sign out on departure.	Unlikely due to measures in place.	Release of polluting materials to air, water or land.	Low
All on-site hazards from wastes; machinery and vehicles	Local human population gaining unauthorised entry to the site, site staff and contractors.	Direct physical contact	Activities will be managed and operated in accordance with an EMS which will include measures to prevent unauthorised access. Wastes, machinery, and vehicles will be handled by trained site operatives. All plant is serviced and maintained as part of a cyclical maintenance plan.	There is always a risk of accidents, but measures have been put in place to reduce the risk associated with site activities.	Injury or health effects	Low

Potential Environmental Hazards

What is the risk?			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk?
Waste material spilt from delivery vehicle	Site personnel, visitors and local residents	Airborne, land, water	<p>Asphalt wastes containing coal tar (AWCCT) and non-hazardous highway excavation wastes and road plainings will be received in sheeted vehicles.</p> <p>Speed restrictions will be in force on site to minimise the risk of vehicle accident.</p> <p>Only Registered Waste Carriers, or those who are lawfully exempt from registration, will be permitted to use the site.</p>	Unlikely due to measures in place.	Injury or health effects, release of polluting materials to air, water or land.	Low
Inadequate waste acceptance procedures, resulting in the receipt of non permitted waste	Site personnel, visitors and local residents	Airborne, land,	<p>There will be strict waste acceptance procedures in place at the site to prevent the acceptance of non-conforming waste types. Details of the waste acceptance procedures are provided in the Operating Techniques report.</p> <p>As part of the development a Weighbridge is to be constructed where the site operative can inspect the load, physically or with CCTV.</p>	Likely	<p>Disruption to works operations</p> <p>Contamination of land & water</p>	Low
Operator error	<p>Site personnel, visitors and local residents.</p> <p>Surface water, air quality and soils</p>	Airborne, land, water	<p>Only trained personnel will receive and process the waste.</p> <p>Access to the waste area will be restricted to trained depot staff.</p> <p>Only trained operators use plant.</p>	Likely	<p>Disruption to works operations</p> <p>Contamination of land & water</p>	Low