

GH By-Products (Derby) Ltd	Environmental Accident Management Plan			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-002	Draft	Draft	draft	Alan Asker

Purpose:

This Environmental Accident Management Plan (EAMP):

- o Outlines the methodology for accident identification;
- o Lists the accident scenarios identified;
- o Provides the control measures in place to mitigate the identified accident scenarios;
- o Lists the relevant controls and related EMS documents.

The EAMP documents will be reviewed and updated, when there have been major modifications to site operations or when there has been an environmental accident at the site.

Definitions:

Major Accident Scenario: Environmental accident scenarios that would result in a rapid response being required to deal with a situation arising on site.

Key Site Information:

- Full emergency contact list is available in the Site Office and as part of the EM 02-006 Drivers Field Manual.

Methodology:

For site operations, the potential for environmental accidents to occur has been evaluated and recorded in the following documents:

- Environment Agency's Standard Rules Permits: SR2010No4 'Generic risk assessment for standard rules set number SR2010No4 v4.0', for land spread operations:
- The Environmental Risk Assessment within the document referenced P171-R02-F1, for Permitted storage operations.

The risk assessment focus on the key environmental risk sources and assesses the potential for them to move via a defined pathway and to impact on an identified receptor.

Although all environmental residual risks are scored as low / insignificant within both assessments, scenarios that are considered 'major environmental accident scenarios' have been discussed in more detail below.

Hazardous Sources

The potential environmental hazard sources from site's waste storage and land spread operations have been identified below:

- The waste streams stored / to be spread to land;
- Fuels from delivery, dispatch and land spread vehicles.

Pathways

The pathways to identified receptors at risk from environmental pollution from major accident scenarios have been listed below;

1. Groundwater: - Any pollutants allowed to enter the underlying ground could enter groundwater and flow towards watercourses.

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2. Surface water: - Any pollutants that could be transferred via surface waters.
3. Atmosphere: - Any pollutants that could be transferred via the air (odours, dusts, noise) would travel in the direction of prevailing winds and potentially impact the closest human receptors in that direction.

Key Receptor Sensitivity:

Environmental pollutants released during an accident event should be prevented from leaving site. Release from site may impact on one of the following identified receptors.

- Residential;
- Ground and surface waters;
- Businesses / Industry.

Receptors are identified within the Environmental Risk Assessment P171-R02-F1 for Permitted Store operations and on the Field Assessment forms submitted with the deployment applications.

Identified major accident scenarios:

The scenarios below are those identified major environmental accident scenarios that would result in a rapid response being required to deal with a situation arising on site (e.g. fuels leaking from site vehicles) and to prevent uncontrolled release of material leaving site and potentially causing a pollution event.

The EAMP should be read in conjunction with the Fugitive Emissions Monitoring Programme (FEMP) which provides information on the measures taken to monitor and control potential accident scenarios to prevent emissions occurring.

Major environmental accident scenarios:

Table 2: Major environmental accident scenarios					Immediate actions required - also see further details in section below
Major risk source	Location	Accident scenario	Information, State & Hazard	Pathways & Receptors of concern	
Waste Material Delivery	Delivery routes.	Fuel leaks	Fuels liquid Flammable Tractors carry tanks for fuel.	<u>Pathways:</u> Ground and surface water. <u>Receptors:</u> Ground /groundwater. Surface water.	Follow Spill Procedure. Use spill kits to contain and clean up. Used absorbents should be placed into dedicated container / drum and marked "hazardous waste".
		Delivery trailer collision / and or failure leading to a major spill of waste materials / fuels.	Waste materials. Agronomist describes them as <i>'if this material was allowed to enter a watercourse it could result in a pollution event'</i> . Fuels liquid Flammable Tractors carry tanks for fuel.	<u>Pathways:</u> Ground and surface water. Atmosphere <u>Receptors:</u> Ground /groundwater. Surface water. Local residents / businesses	Follow Spill Procedure Use spill kits to contain and clean up where appropriate. Used absorbents should be placed into dedicated container / drum and marked "hazardous waste". If required, use Emergency Contact List to contact a chemical clean up contractor.

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Table 2: Major environmental accident scenarios					Immediate actions required - also see further details in section below
Major risk source	Location	Accident scenario	Information, State & Hazard	Pathways & Receptors of concern	
		Site vehicles catching fire.	Fuels liquid Flammable Tractors carry tanks for fuel.	<u>Pathways:</u> Ground and surface water. <u>Receptors:</u> Ground /groundwater. Surface water.	Use Emergency Contact List to contact emergency services.
Waste Storage	Permitted stores and / Storage Locations as specified in deployments.	Failure of storage tank/ lagoon and / or collection / delivery systems, leading to a major spill of waste materials. Failure of valves or pipework at base of tank – including deliberate vandalism or damage – leading to major spill of waste.	Waste materials. Agronomist describes them as <i>'if this material was allowed to enter a watercourse it could result in a pollution event'</i> .	<u>Pathways:</u> Ground and surface water. Atmosphere <u>Receptors:</u> Ground /groundwater. Surface water. Local residents / businesses	Follow Spill Procedure Use spill kits to contain and clean up where appropriate. Used absorbents should be placed into dedicated container / drum and marked "hazardous waste". If required, use Emergency Contact List to contact a chemical clean up contractor.

Pollution prevention site specifics:

- All Land Spread staff trained in land spread procedures;
- In remote locations FEMP defines additional security measures to minimise the risk of vandalism damage.

The following documents are to be used to mitigate against accidents and following their occurrence:-

- Fugitive Emissions Monitoring Programme
- Emergency and Incident Procedure;
- Emergency Contact List;
- Spill Control Procedures;
- EA Notification Form.

Summary of Key Actions in the event of an accident /emergency scenario (See EM 02-002 Emergency and Incident Procedure):

Actions:-

- Contact Environment Agency (0800 807060) and complete relevant permit notification form.
- Contact Senior Management.
- When required, inform Emergency Services.
- Where safe to do so:-
 - Prevent liquids, including fire water, from escaping into surface waters.

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- Complete Incident and Corrective Action Report Form and, where relevant and known, detail type, quantity, hazardous properties of materials that have caused the incident;
- Dispose of any waste materials created as a result of the accident in accordance with relevant legislation;
- Where relevant, provide for contingency measures for interim period whilst repairs are made;

Follow up actions:

Following any on site emergency, accident or significant near miss, the following will be undertaken:

- Replenish spills kits as required;
- Undertake site inspection of areas of the site affected and arrange for necessary repairs;
- Investigation into cause and how to prevent re-occurrence;
- Review of EAMP;
- Update any related documents as required.