

Section 13



Plan

Site Emergency plan

This document relates to the emergency procedures in place which includes but is not limited to spillage procedures, fire prevention, actions in the event of fire including measures in place at the above site in relation to any potential accidental spillage or fire related incident and how it would impact the surrounding environment.

The objective of this document is to assist the Directors, Management and staff of SAR to act in a responsible and planned manner to meet the main objectives as listed below:

- To minimise the likelihood of a fire occurring in the first instance.
- To minimise the spread of fire within our site and also to the surrounding properties on SAR
- To prevent or reduce to as low as possible the accidental spillage / release of substances that could be harmful to the environment.
- To ensure that in the event of an accidental spillage or release of such substances site staff are aware of the actions to be followed to prevent such substances entering the foul or surface water drains
- Non-conforming waste breakdown as per permit requirements

This plan applies to all directly employed staff but also to any external contractor staff visitors and members of the public who may have reason to visit the site at any time.

Copy of this plan will be available in the main reception and transport office for perusal of staff, BFSC's and visitors alike as and when they see fit. Any significant points relating to spillage or the site fire prevention policy may be briefed out to staff as part of their initial induction or any follow up training in the unlikely event of an incident occurring on site.

As part of the Company's commitment towards the prevention of contamination of the environment and control of fire related incidents ALL persons who have reason to visit the SAR site must ensure they familiarise themselves with the site safety rules by signing the visitors book located in the main reception area which includes simple instructions of what to do in the event of a fire.

To try and make the plan as simple and straight forward as possible the plan follows the format, where applicable, as detailed in the above mentioned publications / guidelines. It should be read in conjunction with the site fire action plan as displayed throughout the site (e.g. In main reception above manual call point) and the emergency spill procedure as communicate to staff as part of the site operating procedures.

This plan also complements the current fire risk assessment which underpins the arrangements for the protection of life and property in accordance with current Fire Authority guidelines.

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TYPES OF WASTE MATERIAL HELD / PROCESSED ON SITE:

There are a number of waste products processed on the site and dependent upon the number of planned collections and deliveries the quantity of material waiting to be processed / sorted can vary from one day to the next. However, the Company will always ensure that the total quantity, by specific waste type, on the premises, is not in breach of the current permit as issued by the Environment Agency.

The main streams of waste sorted on site at any one time are

- Scrap Catalytic Converters
- Scrap metals
- WEEE waste
- Cardboard, plastic, textiles, paper, wood
- RCF (Refractory Ceramic Fibres)
- Catalytic powder
- Batteries

INFORMATION, INSTRUCTION AND TRAINING

To ensure all staff are made aware of spillage and fire related issues on site the following measures are in place:

1. All staff are inducted at the start of employment which includes spillage control and fire prevention and control measures this includes but is not limited to the Company smoking policy on site etc
2. A number of staff have received formal fire safety training as provided by a suitably competent training provider.
3. A series of toolbox talks has been delivered to staff regarding but not limited to fire prevention and actions on an accidental / uncontrolled spillage of potentially hazardous substances.

Regular (6 monthly) fire evacuation drills are conducted and documented accordingly this includes instruction as if there were a fire in one of the buildings and the appropriate action to be followed.

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An exercise involving a simulated accidental spillage has been conducted with those staff taking part debriefed on any issues raised as a result of the drill.

A copy of this plan is displayed in the main reception area (in the emergency information pack) with an additional copy available in the Health and Safety Office.

All hot work must be approved by the QHSE Manager before its own staff and any BFSC's conduct such works on site.

A fire risk assessment in accordance with the Fire Regulatory Reform (2005) Order (FRRO) has been conducted which is reviewed on an annual basis as per local authority guidance

Plans are included within this plan (See Annex 1) showing:

- Layout of the buildings on site showing location of waste operational areas
- Main entrance on site with any alternative entrances to be use in the event of an emergency
- Location of the site spill kit equipment
- Location of drains which are to be considered in the event of spillage or a major fire related incident
- Location of fixed and portable fire appliances (Eg hose reels, fire extinguishers and fire hydrant)
- Location of drainage and possible routes of contamination to external drains.
- Location of material on site (note that this can vary dependent upon material intake)
- Location of site with regards to the surrounding area taking into account residential / commercial properties and main access route into site

POSSIBLE CAUSES OF FIRE OR ACCIDENTAL SPILLAGES ON SITE

There are number of factors to be taken into account when considering this issue

ARSON

Control Measures

Gates locked when site not occupied with additional security measures in place to prevent access to site.

The site is equipped with CCTV which can be remotely accessed by the site operation manager.

PIRs are fitted internally and externally which work on movement detection

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In the event of unauthorised entry there is a cascade system in place where nominated persons will be contacted to decide what course of action will be taken. (e.g. contact police).

The site is suitably illuminated during hours of darkness to deter unauthorised entry.

All external doors are locked when the site is not in operation.

Vehicles are parked in designated areas to prevent or minimise collateral damage in the event of a vehicle related fire.

MOBILE PLANT / MECHANICAL HANDLING EQUIPMENT (MHE)

Control measures

All mobile plant and items of mechanical handling equipment are subject to a daily before use check which identifies any faults, this is documented and signed off by the nominated person.

A site clean down / shut down procedure is in place which is completed at the end of each working day

When not in use any static plant is switched off and where possible isolated from the mains supply and items of mobile work equipment (MWE) have the ignition keys removed.

Housekeeping standards around processing plant is maintained to a high standard.

All equipment (Static and mobile) is maintained to a high standard with faults that are identified as part of the daily inspection repaired by SAR Metals or external contractor staff as soon as is practicable.

All items of MWE / mobile plant are subject to inspections in accordance with the current LOLER requirements and in addition are subject to routine service / inspection by SAR Metals or external contractor staff as part of the contract hire arrangements.

ELECTRICAL FAULTS

Control measures

When not in use all electrical items within the site are switched off and where possible isolated from the mains supply.

The fixed electrical system is subject to regular inspection / testing in accordance with the current Electrical Installation Regulations by suitably competent SAR Metals or external contractor staff with

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any remedial works completed within the given time frames. (5 yearly cycle as recommended by qualified electrician)

All electrical items of a portable nature are subject testing on a risk based frequency. (PAT testing).

Repairs to any defective electrical equipment or installation of additional equipment requiring an electrical supply are carried out by suitably competent SAR Metals or external contractor staff with supporting documentation in place to provide evidence that this is the case.

DISCARDED SMOKING MATERIAL

Control measures

Smoking is prohibited in any building on site.

Persons that need to smoke are only permitted to do so in the designated smoking areas where a suitable receptacle is provided to place discarded / spent smoking material or the smoking shelter adjacent to the staff mess room.

Signs are located throughout the site informing persons that the site is a no smoking area.

Processed material is not stored directly adjacent to the main gate in case of discarded material entering the site from the public highway / footpath.

HOT WORKS

Control measures

All hot works must be approved by the QHSE manager for work by own staff and external contractor staff when there is a need to conduct such works.

All visitors to site, including external contractor staff who attend regularly, are required to book onto site in the main reception office where a copy of the site rules which include fire prevention measures are displayed and by signing the visitors book this confirms that any visitors to site have read and understood such rules.

LEAKS AND SPILLAGES

Control measures

Spill kits, which are readily available, are provided on site for use in the event of an emergency.

Equipment is regularly checked and maintained as required.

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Any contaminated material will be disposed of in accordance with current EA guidelines.

PHYSICAL FIRE PREVENTION MEASURES

Control measures

Received waste is segregated on delivery to site in the designated area and processed as quickly as possible.

Areas where waste is received are monitored to prevent material “creep” and where this is the case the pile is reformed within the designated sorting area.

Waste with a low volume is stored in separate containers adjacent to the sort area until such time that it is economically viable to out load for further processing where required.

Due to the nature of the material sorted on site and the type of material that is authorised to be processed on site the quality of received material is closely monitored and if any unauthorised material/out of specification waste is received it is quarantined until suitable arrangements are made to either return it to the originator or to be collected by an authorised waste carrier for onward movement to a suitably licensed site.

Smoking is prohibited on site unless in designated areas as previously mentioned.

Visitors are required to book onto site and read site safety rules which include fire prevention issues.

Regular visits conducted by various consultants to advise on any improvements / additions to site spillage / fire arrangements.

MANAGEMENT OF PROCESSED / SORTED MATERIAL

Control measures

Once sorted material is loaded into designated skips / containers arrangements are made to transport such items as soon as is reasonably practicable.

Received material is checked for content of prohibited material (e.g. unacceptable batteries and other flammable liquids) and where this is thought to be excessive the material is rejected before sorting / processing.

All residual waste is stored in designated onsite waste areas & in skips, and transported to final destination as soon as possible to prevent the build up of the quantity of waste material on site at any one time.

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Batteries, including Lithium versions, have a separate storage area.

PREVENTION OF SPREAD OF FIRE

Control measures

Waste is segregated during sorting/processing into material specific areas.

Sorting area is maintained to prevent material “ creep” within designated sorting area.

Whenever possible material that has been sorted/processed is placed into different dedicated containers for each type of waste.

Where the quantity of material allows, some items are stored in containers of various sizes that can be moved out of site / further away from buildings in the event of a fire related incident.

Any “out of spec material” which is considered to be “ high risk” is stored in a non-conforming waste container where there is a clear fire break between such material and it is disposed of in a timely manner dependant upon local restrictions / regulations.

DESIGNATED QUARANTINE AREAS IN THE EVENT OF A SPILLAGE / FIRE RELATED INCIDENT

Control measures

In the event of a spillage or a fire related incident any contaminated material will be stored in a designated area (size of which will depend upon quantity of contaminated material) whilst waiting for such material to be removed from site. (e.g. absorbent material as used to contain spilt hydraulic oil)

DETECTION OF FIRES ON SITE

Control measures

There are a number of means of fire detection on site as listed below:

- Visual throughout the normal working day. A number of staff have attended fire marshal / fire warden training and as a result are aware of the principles of fire etc.
- Smoke and heat detectors are installed in offices and warehouses.
- Site is remotely monitored by a security company/key holder whose staff visit site when an alarm activation has occurred

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- Fire Brigade are immediately notified of an activation by the security company outside of office hours even if it is a false alarm

Portable fire extinguishers are provided on site in clearly defined areas which are easily accessible for use in the event of a fire. Such items are maintained by a suitably competent BFSC with records to demonstrate this fact.

ADDITIONAL ACTIONS IN THE EVENT OF A FIRE E.G. SEGREGATION / REMOVAL OF STOCK MATERIAL

Control measures

As previously mentioned items of mobile plant will be used to enable the movement of containers on site in the event of a fire related incident.

In the event of a fire the monitoring company would communicate this fact to nominated members of staff who would attend the site as soon as is reasonably practicable.

Site drainage indicated on the attached drawings. Drain covers and a penstock valve installed/available, to be able to prevent any fire water from leaving the site via the drainage system.

Water supplies

Mains water is available for use in the event of a fire related incident.

MANAGING RUN OFF WATER OR A SIGNIFICANT SPILLAGE

In the event of a fire related incident the fire authority will be issued with a drainage plan of the site which identifies drainage on site. Drain covers and penstock valve are available for use, however each local fire authority appliance is equipped with suitable drain covers that could be used to protect such drains.

The spill kits as currently provided contains the following materials: bags of spill granules, absorbent mats, absorbent boom, drain cover/s, disposable gloves.

DURING AND POST INCIDENT ACTIONS

DURING A SPILLAGE OF A SIGNIFICANT NATURE OR FIRE RELATED INCIDENT:

1. Close liaison with the local fire authority and / or the EA will be maintained by all parties involved in the incident.

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2. The quantity of spilt fluids or run off water will be monitored in consultation with the local fire authority.

The means of protecting water drains will be monitored in consultation with the local fire authority / EA.

Where required, and only if safe to do so, own staff will assist in the removal of material from any premises on site to the designated quarantine areas.

The company will redirect any in bound waste to other locations where it can be processed / sorted in the correct manner.

Contact any customers and inform them of the incident and make alternative arrangements with regards to their waste collection.

POST INCIDENT

The Company will:

Fully assist in any investigation as conducted by any of the enforcing authorities. (Eg EA or local fire authority)

Inform current insurance broker of the incident as soon as possible to arrange for appropriate action to be taken. (Eg loss adjuster attending site)

Ensure that any waste generated as a result of the spillage or fire will be disposed of in accordance with legal requirements.

Conduct an internal investigation into the circumstances of the incident and where applicable carry out action to prevent a similar incident occurring in the future.

Any rebuilding works will be conducted in compliance with any local planning, EA or insurer requirements.

COMPLIANCE MANAGEMENT & EMERGENCY SITUATIONS

Certain emergency situations may mean that technical and other competences required to maintain compliance with the environmental permit may not be available when needed.

Such situations may include:

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1. **Pandemic such as COVID-19 – staff ill or self-isolating so cannot carry out their normal duties.** The company maintains a register of who has what competencies and as far as possible ensures
 - At least two competent people are available to the company at relevant times
 - If possible facilitate access to technical competence through alternative means (remote working, short-term consultant input)
2. **Emergencies such as fire, spillage or flooding which make it impossible to comply with permit requirements in the short-term**
 - As detailed in the emergency plans within this document all possible action is planned to prevent the emergency, and limit the impacts should the emergency arise
3. **Staff resignation that leaves a shortage of specific skills and competencies needed to maintain environmental permit compliance**
 - At least two competent people are available to the company at relevant times
 - Re-assign duties &/or recruit new staff to replace the skills and competencies lost

FLOODING

The site is located in a flood risk zone and the company has signed up to floodline to be alerted to any potential flood incidents impacting on the site. The likelihood of flooding (as described in Gov.Uk web site) is low risk from surface water and very low risk from rivers and the sea.

Once an alert is received management will review the alert and make decisions regarding continued site operation, the storage of waste materials and equipment and evacuation of personnel.



Site Accident and Emergency

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ANNEXE 1



Site Accident and Emergency

Plan

TBC completed as the site is constructed and emergency controls are installed (Fire alarms, Fire Extinguishers,

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1 – SITE PLANS – TO BE FINALISED UPON SITE COMPLETION AND IMPLEMENTATION OF SITE CONTROLS – FIRE EXTINGISHES, BUNDING ETC