

Emergency Response Plan

Clark, Wayne

2023

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Introduction

The aim of the Site Emergency Plan is to ensure that the site’s response to any emergency is as efficient and effective as possible.

It is intended that the Site Emergency Plan will facilitate best use of the combined resources of the site, HBR Personnel and Emergency Services in connection with any emergency at the site and, where applicable, to

* effect the recovery and treatment of casualties.
* safeguard other individuals (on and off site)
* minimise health impacts, damage to property and the environment (on and off site)
* prevent escalation and ultimately bring the incident under control.
* identify all injuries (on site)
* provide counselling and support where necessary.
* provide authoritative information to the news media.
* restore the site to normal operation as quickly as possible.
* preserve relevant records and equipment for any subsequent enquiry.

The Site Emergency Plan is primarily intended for use by individuals based at the site that may become involved in dealing with or be directly affected by an on-site emergency.

The document is also intended for use by any other HBR personnel who may be involved in any capacity in dealing with an emergency at the Bradleys Lane site.

# Scope

The Site Emergency Plan will be initiated in all cases when an emergency, as defined, below exists on site as declared by sounding of the Site Emergency Alarm. The on-site alarm is given by sounding (an) air klaxon(s).

The Site Emergency Alarm will be triggered in any situation where one or more of the following criteria are satisfied.

* an incident which causes injuries to several individuals.
* a fire which cannot or, in the judgement of site personnel, is unlikely to be controlled using first action level fire-fighting equipment, (e.g. fire extinguishers), and which threatens the safety of personnel on site.

NOTE: If you do not consider that you can extinguish any fire easily and quickly using such equipment, you must ensure that the Emergency Services are called without delay.

* a release of any flammable, toxic or corrosive substance or substances which threaten the safety of, or in the judgement of site staff, are likely to affect site personnel, members of the public or neighbours or cause serious environmental impact, which cannot be controlled by on-site site staff using readily available resources
* any other situation which threatens the safety of site staff, neighbours and/or the public or the environment and which cannot be controlled by on-site staff using readily available resources

All site personnel have the authority to raise the emergency alarm if, in their judgement, it is appropriate to do so.

The Emergency Plan fulfils part of the duties required under the Management of Health and Safety at Work Regulations 1999.

# Emergency Initiation

## Raising the alarm

Upon discovery of

* fire
* release of flammable, toxic or corrosive substances
* spill
* any other situation which threatens the safety of site personnel, neighbours, the public or the environment

Activate the nearest emergency alarm (fire alarm) call point then inform a member of the site management team by:

* Telephone: Duty Lead 07850 033741
* runner.

All site personnel have the authority to sound the emergency alarm if, in their judgement, it is appropriate to do so.

NOTE: The Emergency Services must be informed of ANY incident on site which involves an emergency response and the implementation of this Emergency Plan.

Once the emergency alarm is sounded, the Site Emergency Plan will be initiated in all cases.

Emergency shutdown procedures will be followed for all operations on site on every occasion that the emergency alarm is sounded.

The site, including on-site service and office buildings will be evacuated on every occasion that the Site Emergency Plan is initiated, unless instructions to the contrary are issued by the Incident Controller (IC) either directly or via the Evacuation Marshalls (EM).

The normal evacuation assembly point is located next to the pedestrian entrance of the site, opposite the main office block.

The Site Controller (SC) will advise evacuated personnel of alternative assembly point arrangements if the normal assembly point is affected by the circumstances of the emergency in progress. The assembly point may be indoors or outdoors depending upon the circumstances.

The most likely alternative assembly point is outside the access gate, across the road located on the green next to the residential building.

The IC will advise the EMs of an alternative safe route to the assembly point if the most direct route is affected by the circumstances of the emergency in progress. This may include an instruction for evacuees to report to the nearest safe haven or to remain indoors. The locations of the safe havens are shown on the Site Plan at Attachment 2 to this document.

The EMs will direct evacuees to follow the most appropriate safe route to the assembly point. Assembly point locations are shown on the Site Plan at Attachment 2 to this document.

The IC, in conjunction with the SC, will assess the emergency situation to determine the appropriate message to give to the Emergency Services.

If on initial assessment it is decided that attendance by all Emergency services is not required, the IC and SC will review the assessment whilst the emergency is still in progress to determine whether the situation has escalated to a point where attendance by other Emergency Services are required.

The Emergency Services will be contacted by the SC or by their support, as instructed by the SC except in circumstances when these individuals are incapacitated or otherwise prevented from contacting the Emergency Services when contact will be made by the Office Supervisor.

The Emergency Services will be contacted as follows

* Dial 999 and ask for
* Ambulance/Police/Fire Service as appropriate

State: “An emergency is in progress/has occurred at the site.”

Halo Battery Recycling Ltd.

Bradleys Lane

Tipton

DY4 9EZ

Brief details of the nature and extent of the incident must then be given using the checklist included overleaf (Appendix I to this document) as a guide.

Stay on the phone and ask the operator to connect you to the Police so can inform them of the incident.

The SC or their support, will contact the following individuals/Authorities/ other organisations in turn, at the earliest opportunity (if they are not already on site).

## Key Personnel

|  |  |  |  |
| --- | --- | --- | --- |
| **Key Company Personnel** | | | |
| **Name** | **Title** | **Contact No.** | **Contacted Y/N** |
| TBC | Site Manager | TBC |  |
| Leigh Davies | Compliance Manager | 07850 033741 |  |
| Steve Andrew | Chief Technology Officer | 07521 053375 |  |

Once the On-site emergency plan has been initiated, the procedure must be followed at least until the roll call is completed including in cases when the alarm has been raised but the incident in question is brought under control very quickly. Authorisation to return to work must not be given before the roll call is completed and all individuals accounted for.

# Key Roles for Emergency Response

The following key roles will be fulfilled by nominated site personnel or their nominated deputy in response to any emergency requiring initiation of the Site Emergency Plan. The individual(s) fulfilling each of the roles is/are identified as shown in the table below.

|  |  |
| --- | --- |
| **Key Role** | **Identification** |
| Site Controller (SC) | High Visibility Tabard |
| Incident Controller (IC) | High Visibility Tabard |
| Site Controller Support (SCC) | High Visibility Tabard |
| Evacuation Marshalls (EM) | High Visibility Tabard |
| Roll Call (RC) | High Visibility Tabard |

High visibility tabards and emergency grab bags are located in the:

* Reception Area (Office Building)
* Plant/Production Office

The grab kits are collected, if possible, and delivered to the evacuation assembly point by the relevant individuals.

## Managing Director

It is the responsibility of the Managing Director (MD) to ensure that all personnel based at the site receive appropriate training and are fully conversant with the requirements of the Site Emergency Plan.

## Site Manager

It is the responsibility of the SM to ensure that any contractors working at the site are formally inducted, including appropriate training in emergency procedures.

## Employees

It is the responsibility of every individual based at the site to follow the requirements of the Site Emergency Plan in any situation where the site emergency alarm is sounded and the Site Emergency Plan initiated. Further, it is the responsibility of every individual present at the site when an emergency is in progress, to follow any instructions given by those assigned specific responsibilities via the Site Emergency Plan.

It is the responsibility of any individual receiving visitors at the site (e.g., customer audits) to ensure that these visitors are accompanied on site and, should an emergency arise, that they are accompanied to the assembly point.

Note: The principal duties of the key role holders as set out below are reproduced as laminated cards contained in the Emergency Plan Grab Packs for quick and easy reference. The Site Plan which appears at Attachment 1 of this document is reproduced on the back of each laminated card.

## 

## Incident Controller

This role will normally be fulfilled by the Site Manager. The nominated deputy will be the Plant Supervisor.

|  |  |
| --- | --- |
| **DUTIES** | **COMPLETED**  **Y / N** |
| In charge of the response to the emergency incident on site |  |
| In control of all individuals required to assist directly in controlling the emergency incident on site |  |
| Assess and monitor the emergency incident and liaise with the SC to ensure that response requirements are satisfied, and to ensure that the most appropriate message is given when calling in the Emergency Services using the checklist provided. The IC must maintain contact with the SC mobile telephone or by runner |  |
| Direct the shutdown of operations in accordance with the relevant emergency shutdown procedures |  |
| Liaise with the Emergency Services on site and assist where appropriate to bring the incident under control |  |
| Inform the SC and the EMs when the normal safe route to the assembly point is affected by the emergency incident and advise of a safe alternative route and/or assembly point. |  |
| Work with the Emergency Services in the search for casualties on site |  |
| Liaise with the SC to draw up an Emergency Response Team from any suitably trained and experienced site staff present on the site or at the assembly point |  |
| Liaise with the SC to ascertain the wind direction and decide the path and affected areas as a result of the wind dispersing the release. |  |
| Assist the SC in providing the following information to the Emergency Services.   * A safe route to the emergency incident location on site * Site areas which require cordoning off * Whether or not the site access roadway is affected or likely to be affected |  |

Site Controller

This role will normally be fulfilled by the SM. The nominated deputy will be the SS. The SC is in overall charge of the emergency working from the designated assembly point/Emergency Control Centre.

The principal duties of the Site Controller are as follows.

|  |  |
| --- | --- |
| **DUTIES** | **Completed (Y/N)** |
| Act as the point of contact for the IC and liaise with the IC to ensure that the emergency situation is dealt with effectively and efficiently (the SC must maintain contact with the IC via Mobile Telephone, by runner or by any combination of such means) |  |
| Ensure that all operations have been shut down in accordance with the relevant emergency shutdown procedures |  |
| Ensure that the Emergency Services are contacted as required |  |
| Ensure that key company personnel, Regulators, Authorities and any other bodies are contacted as required. |  |
| Receive and provide appropriate information to the Emergency Services on their arrival at the site and direct them to the incident location on site via the most appropriate route |  |
| Decide if weather conditions are likely to inhibit dispersion of the release. |  |
| Liaise with the IC to ascertain the wind direction and decide the path and affected areas as a result of the wind dispersing the release. |  |
| Liaise with the SCS to confirm the extent of the release by monitoring downwind as soon as possible and if appropriate. |  |
| In conjunction with the IC provide the following information to the Emergency Services on initial contact or on route;   * A safe route to the emergency incident location on site * Site areas which require cordoning off * Whether or not the site access roadway is affected or likely to be affected |  |
| Advise the Emergency Services of any missing persons. |  |
| Prevent the unnecessary arrival of delivery vehicles, visitors or any other scheduled arrivals at the site. |  |
| At a time considered appropriate liaise with the Emergency Services to give the order to cancel the on-site emergency alarm and to sound the off-site emergency all clear. |  |
| Only when satisfied that it is safe to do so, instruct evacuated personnel to return to work |  |
| Ensure that casualties are receiving adequate attention and, if appropriate arrange for additional assistance. |  |
| Provide for the welfare need of the establishment personnel, for example the provision of food and drinks, relief and the means to keep relatives informed |  |

Evacuation Marshall

This role will be allocated at the time of the incident by the Incident Controller.

The principal duties of the Evacuation Marshall are as follows.

|  |  |
| --- | --- |
| **DUTIES** | **COMPLETED**  **Y / N** |
| On hearing the on-site emergency alarm and, after safely shutting down any plant or equipment on which he/she is working, the EM will, provided it is safe to do so, check the following areas on site and ensure that all individuals present, except those directly involved with the emergency incident, make their way to the assembly point by the most appropriate route in accordance with the IC |  |
| Report to the Roll caller to confirm that evacuation of the site is completed (except for those involved in dealing directly with the incident in progress) |  |

Roll Caller

This role will normally be fulfilled by the SM. The nominated deputy will be the Office Administrator.

The principal duties of the Roll Caller are as follows.

|  |  |
| --- | --- |
| **DUTIES** | **COMPLETED**  **Y / N** |
| On hearing the on-site emergency alarm, the RC will, provided it is safe to do so, collect the site visitors book, emergency response equipment bag and staff attendance records from the office reception area en route to the assembly point |  |
| Liaise with the EM to confirm that evacuation of the site has been completed |  |
| Carry out the roll call referring to the drivers log, check in board and visitors book |  |
| Report to the SC accordingly, including providing the details of any individual(s) not accounted for |  |

Site Controller Support (SCS)

This role will be assigned at the time of the incident.

The principal duties of the Site Controller Support are as follows.

|  |  |
| --- | --- |
| **DUTIES** | **COMPLETED**  **Y / N** |
| Collect the Emergency Grab Pack and high visibility tabards the office |  |
| Collect technical information which is likely to be relevant from the production building. |  |
| Report to the SC and provide support in the form of relevant materials information, monitoring and assessment of the emergency incident, contacting key personnel/Regulators/other bodies etc., as required by the SC. |  |
| Liaise with the SC to confirm the extent of the release by monitoring downwind as soon as possible and if appropriate. |  |
| Make a chronological record, using the template, of the emergency incident as it progresses. |  |

Immediate action to be taken in response to an emergency.

The general immediate actions to be taken in response to an emergency as set out in below are applicable under all circumstances.

## Fire

The IC, assisted by emergency team members (emergency team members will be selected by the IC/SC and may include any site personnel present and not having specific duties defined in the Site Emergency Plan) and provided it is safe to do so, will;

|  |  |
| --- | --- |
| **ACTIONS** | **COMPLETED**  **Y / N / NA** |
| Shut down operations in accordance with the plant emergency shutdown procedure |  |
| Use appropriate equipment to prevent the spread of fire to other areas until such time as the Emergency Services arrive at the site |  |
| Isolate electrical supplies to plant and equipment which may be affected by or contributing to the emergency incident |  |
| Close isolation valves on storage tanks and/or pipelines which may be affected by or contributing to the emergency incident |  |
| Fasten closures on containers and/or consider the relocation of containers including pressurised gas cylinders, which may be affected by or have the potential to contribute to the emergency incident |  |
| Ensure, in conjunction with the SC communicating by runner), that any information likely to be required by the Emergency Services is readily available |  |

### Location of documented information

|  |  |
| --- | --- |
| **Information** | **Location** |
| Containerised and bulk materials inventory logs | Electronic (Quick Consign) |
| Identification labels | Attached to individual containers displaying material classification and associated hazards |
| Manufacturers/producers material health and safety data sheets and general hazardous substances reference publications | Electronic (SharePoint) |
| Plant Operations Logs | Electronic (SharePoint) |

## Spill

In the event of a significant spill which has the potential to travel ensure that the four principles of spill management set out below are followed:

2

4

3

1

|  |  |  |
| --- | --- | --- |
| **Spill Action Plan** | | |
| **1** | **Communicate the Hazard** | |
| Immediately notify others working in the area and if necessary, evacuate the area. | The only possible spill which could occur would be a spill of Diluted Electrolyte (Battery Acid) >75,000L or Sodium Hydroxide <2,000L.  There would be no requirement to evacuate the area. |
| **2** | **Contain the hazard** | |
| Once the immediate situation has been addressed take steps to keep the spill from spreading to other areas or contaminating adjacent surfaces. Confine the spill into as small an area as possible using absorbent material or neutralizer. | Sodium Hydroxide can be used to neutralize spills of battery acid, but it is preferable to dilute with water using the hose pipes in the building wash the spill into the containment tanks |
| **3** | **Contain the hazard** | |
| For large spills inside the building the spill can be diverted to the spill containment tanks which are under the building. | The production building is bunded and will hold a total of 90,000L.  An AODD Pump with flexible hose can also be used to contain spills >5,000L (including water used to dilute) the spill can be pumped into the Feed Tanks. |
| **4** | **Clean up the spill and any damage** | |
| If the spill is small and has been cleaned up using adsorbents these should be collected in sealed drums or bags and labelled according to the hazardous waste classification and stored until disposal.  If the spill was significant and was diverted into the underground storage tank arrangements should be made with an approved waste contractor (see opposite) | Use Spill kits available in the area.  Empty feed tanks and or the containment tanks using:  **Castle Environmental** **Ltd**  Tel: 0115 9442994 |

## Accident Injury

Any accident injury which occurs as a direct result of an event leading to initiation of the On-site Emergency Plan, or which occurs on site during the course of and/or as a result of the response to the emergency incident, will be dealt with as instructed by the Incident Controller.

Any accident injury which occurs at any other time, depending upon the severity of the injury, may be dealt with as follows.

* Without personal risk, go to the assistance of the casualty.

Do not attempt to move an immobilised casualty, except for removal from a toxic vapour hazard or removal from an area under threat from fire.

* Call for assistance from a site first aider to apply basic first aid measures.
* Ensure that the Incident Controller is informed without delay.
* Call the Emergency Services if necessary.

Follow Up Action

It is the responsibility of the SC, in conjunction with the IC and the Emergency Services where appropriate, to determine when the emergency incident has been brought under control and it is safe for evacuated personnel to return to site and/or for the site to resume normal operation.

It is the responsibility of the SC, in conjunction with the IC, to ensure that any evidence connected with the emergency incident is preserved. In particular, any plant and equipment involved in the incident must not be moved or removed unless it represents an immediate health and safety risk.

It is the responsibility of the SC, in conjunction with key company personnel called to the emergency incident, to collect witness statements relevant to the incident at the earliest opportunity.

It is the responsibility of the SC in conjunction with key company personnel called to the emergency incident, to contact the Health and Safety Executive at the earliest opportunity and, if appropriate to do so, to report in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995.

It is the responsibility of the key company personnel called to the emergency incident, in conjunction with site personnel, the Emergency Services, Regulatory Authorities and any other bodies as appropriate, to make suitable arrangements to deal with the aftermath of the incident in order to minimise possible safety, health and environmental effects.

It is the responsibility of the key company personnel called to the emergency incident, in conjunction with site personnel, to carry out a full investigation into the incident and report its findings to all relevant parties.

It is the responsibility of the key company personnel called to the emergency incident to contact all other relevant company personnel.

It is the responsibility of the key company personnel involved in the emergency to arrange provision of counselling and support where necessary.

# Out of Normal Hours Emergency Incidents

The site is normally fully staffed between the hours of 0600 and 1800 Monday to Friday and manned by at least one operator between the hours of 0800 and 1300 on Saturday, only by prior arrangement. The Site is closed at all other times. Offloading will only be permitted by a driver trained in relevant offloading procedures and the driver must be supplied with a mobile telephone programmed with the telephone numbers of the Plant and Operations Managers.

Should an emergency incident occur at a time when the site is operational but not fully staffed, it is the responsibility of the senior member of staff on site to decide whether or not the incident can be controlled.

It is the responsibility of the individual in charge to ensure that the Managing Director & Site Manager are contacted immediately.

If it is decided that the incident can be controlled, it is the responsibility of the individual in charge to initiate those elements of the Site Emergency Plan which are appropriate to the situation in hand.

The senior member of staff will assume the role of Incident Controller and assign roles according to the Emergency Plan to other individuals present.

If it is decided that the incident cannot be controlled, it is the responsibility of the individual in charge to ensure that the Emergency Services are called. The most senior staff member on site will assume the role of Site Controller until relieved.

It is unlikely that a major incident will occur whilst the site is not manned since any such situation is likely to arise as a result of operational activities.

It is however, conceivable that an emergency situation may arise as a result of off-site events which impact on the site, vandalism, or the failure of storage tanks or containers leading to the uncontrolled release of hazardous substances.

Information regarding such a situation may reach site personnel by way of a number of available routes:-

* Via remote security/surveillance company’s emergency contact list
* Via the company’s 24-hour emergency telephone service
* Directly from the Environment Agency or any other Regulatory Body or Authority
* Directly from the Emergency Services
* Directly from a site neighbour or member of the public
* Via local radio or television news broadcasts

Any member of site staff receiving information regarding an emergency at the site when the site is unattended must, in the first instance, contact the Site Manager or Managing Director or, if neither of these are contactable, any of the other key company personnel identified in Section 3.6 of the On-site Emergency Plan.

The Site Manager or Managing Director must attend site and contact or arrange for other members of the site emergency response team to be contacted and to wait on standby for further information/instructions.

On arrival at the site, the Site Manager/Managing Director must assess the situation and arrange for other members of the site emergency response team to attend site if appropriate.

If the Emergency Services are present at the site on arrival of the Site Manager/Managing Director, the Site Manager/Managing Director must provide, as far as possible, any assistance which the Emergency Services require and contact other members of the site emergency response team to attend site.

Under such circumstances, the Site Manager/Managing Director will assume the role of Site Controller and, upon arrival of other members of the site emergency response team, will implement those elements of the On-site Emergency Plan which in his/her opinion, are appropriate to the circumstances.

Appendix I: Site Inspection Checklist

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Site | | | | | | | |  | | | | | | | |
| Week commencing | | | | | | | | *dd* | | | | *mm* | | *yyyy* | |
| TCM minimum attendance required | | | | | | | |  | | | | | | | |
| TCM attendance (hrs/wk.) | | | | | | | |  | | | | | | | |
| **Inspected items** | **Frequency** | **Mon** | | **Tue** | | **Wed** | | **Thu** | | | **Fri** | | | **TCM weekly audit** | | **Date NC raised** | |
| Person completing the checklist | Initials |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Condition of site ID boards & signs | Weekly |  | |  | | | | | | | | | |  | |  | |
| Condition of access road and surfaces | Weekly |  | |  | |  | |
| Condition of operational area | Weekly |  | |  | |  | |
| Site building & welfare | Weekly |  | |  | |  | |
| Interceptors | Weekly |  | |  | |  | |  | | |  | | |  | |  | |
| Waste types, conditions & storage | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| CCTV operational | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Quarantine area clear? | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Isolation area clear? | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Fuel storage area secure? | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Fencing, gates | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Housekeeping? | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Waste acceptance/inspection | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Fire extinguishers? | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Bays | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Skips | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Lighting | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Other liquid storage | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Surface drainage system clear | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Control of odour | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Control of dust | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Control of noise | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Control of litter/debris | Daily |  |  |  |  |  |  |  | |  |  |  | |  | |  | |
| Check tank floats/levels | Weekly |  |  |  |  |  |  |  | |  |  |  | |  | |  | |

|  |
| --- |
| *Monday* |
| *Tuesday* |
| *Wednesday* |
| *Thursday* |
| *Friday* |
| *Other* *comments* |