UK Remediation Ltd

ACCIDENT MANAGEMENT PLAN

Fixed Soil Treatment Facility, Exeter

October 2025

DOCUMENT CONTROL SHEET

Report No:	E7555UK.AMP.01.R02
Issue:	03
Author:	Chris Baker
(Signature):	
Project Manager/Director:	Simon Hockin
(Signature):	
Date:	14/10/2025

Issue	Status	Date	Author	Reviewer 1	Reviewer 2
01	ISSUE	17/02/2025	CB	SH	RD
02	ISSUE	29/05/2025	LM	CB	SH
03	ISSUE	14/10/2025	CB		

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1. INTRODUCTION

This Accident Management Plan has been produced in accordance with EA Guidance Document 'Develop a Management System: Environmental Permits, 3rd April 2023'.

It is stipulated under this guidance document that the Accident Management Plan fulfils the following four key requirements:

• Identifies events or failures that could damage the environment;

• Assesses how likely they are to happen and the potential environmental consequences;

• Actions to minimise the potential causes and consequences of accidents.

This Accident Management Plan has been implemented and maintained at the site as part of the company's Environmental Management System and will ensure the site and all operatives within are fully prepared for such incidents.

The Accident Management Plan and all associated procedures will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence / recurrence.

All the necessary actions that are required to be taken in the event of an accident will be detailed within the detailed Site Emergency Procedures.

2. RISK MAGNITUDE ESTIMATIONS

2.1 Waste Types and Substances Stored Onsite

Permitted waste types are tabulated in Table 1.

Table 1: Permitted waste types into Exeter FSTF.

EWC Code	EWC Description
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 03 05*	Other tailings containing hazardous substances
01 03 06	Tailings other than those mentioned in 01 03 04 and 01 03 05
01 03 07*	Other waste containing hazardous substances from physical and chemical processing of metalliferous minerals
01 04 09	Waste sand and clays
01 04 12	tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 07*	Wastes containing hazardous substances from physical and chemical processing of non-metalliferous mineral
01 05 04	Freshwater drilling meds and wastes
01 05 05*	Oil-containing drilling muds and waste
01 05 06*	Drilling muds and other drilling wastes containing hazardous substances

EWC Code	EWC Description
05 01 03*	tank bottom sludges
05 01 09*	Sludges from on-site effluent treatment containing hazardous substances
05 01 10	sludges from on-site effluent treatment other than those mentioned in 05 01 09
06 05 02	Sludges from on-site effluent treatment containing hazardous substances
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 04*	Oil fly ash and boiler dust
10 01 14*	Bottom ash, slag and boiler dust from co-incineration containing hazardous substances
10 01 15	bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 16*	fly ash from co-incineration containing hazardous substances
10 01 17	fly ash from co-incineration other than those mentioned in 10 01 16
10 01 20*	sludges from on-site effluent treatment containing hazardous substances
10 01 21	sludges from on-site effluent treatment other than those mentioned in 10 01 20
10 02 07*	Solid waste from gas treatment containing hazardous substances

EWC Code	EWC Description
10 02 13	Sludges and filter cakes from gas treatment containing hazardous substances
10 11 15*	Solid wastes from flue-gas treatment containing hazardous substances
10 11 16	solid wastes from flue-gas treatment other than those mentioned in 10 11 15
10 11 17*	sludges and filter cakes from flue-gas treatment containing hazardous substances
10 11 18	sludges and filter cakes from flue-gas treatment other than those mentioned in 10 11 17
10 11 19*	solid wastes from on-site effluent treatment containing hazardous substances
10 11 20	solid wastes from on-site effluent treatment other than those mentioned in 10 11 19
10 12 05	sludges and filter cakes from gas treatment
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 09*	solid wastes from gas treatment containing hazardous substances
10 12 10	solid wastes from gas treatment other than those mentioned in 10 12 09
10 12 13	sludge from on-site effluent treatment
10 13 11	wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10

EWC Code	EWC Description
10 13 12*	solid wastes from gas treatment containing hazardous substances
10 13 13	solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	waste concrete and concrete sludge
12 01 14*	machining sludges containing hazardous substances
12 01 15	machining sludges other than those mentioned in 12 01 14
12 01 16*	waste blasting material containing hazardous substances
12 01 17	waste blasting material other than those mentioned in 12 01 16
13 05 01*	solids from grit chambers and oil/water separators
13 05 02*	sludges from oil/water separators
13 05 03	Interceptor sludges
13 05 08	Mixtures of waste from grit chambers and oil/water separators
16 07 08	Wastes containing oil
17 01 02	Bricks
17 01 06*	mixtures of, or separate fractions of concrete, bricks, tiles and ceramics containing hazardous substances
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06

EWC Code	EWC Description
17 03 01*	bituminous mixtures containing coal tar
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05 03*	Soil and Stones
17 05 04	Soil and Stones other that those described in 17 05 03
17 05 05*	dredging spoil containing dangerous substances
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 07*	track ballast containing hazardous substances
17 05 08	track ballast other than those mentioned in 17 05 07
17 06 05	Construction Waste Containing Asbestos
17 09 03*	Mixed construction demolition waste other than those mentioned in 17 09 03*
19 01 11*	bottom ash and slag containing hazardous substances
19 01 12	bottom ash and slag other than those mentioned in 19 01 11
19 01 13*	fly ash containing hazardous substances
19 01 14	fly ash other than those mentioned in 19 01 13
19 01 15*	boiler dust containing hazardous substances
19 01 16	boiler dust other than those mentioned in 19 01 15
19 02 03	Pre-mixed wastes composed only of non-hazardous wastes

EWC Code	EWC Description
19 02 04*	Pre-mixed wastes composed of atr least one hazardous waste – waste suitable for biological treatment only
19 02 05*	Sludges from physio/chemical treatment containing dangerous substances
19 02 06	Sludges from physico/chemical treatment other than those mentioned in 19 02 05
19 02 11*	Other wastes containing hazardous substances – wastes suitable for biological treatment only
19 04 02*	fly ash and other flue-gas treatment wastes
19 05 03	Off specification compost
19 08 01	Screening
19 08 02	Waste from desanding
19 08 13*	Sludges containing hazardous substances from other treatment of industrial waste water
19 08 14	Sludges from other treatment of industrial waste water other than those mentioned in 19 08 13*
19 11 05*	sludges from on-site effluent treatment containing hazardous substances
19 11 06	sludges from on-site effluent treatment other than those mentioned in 19 11 05
19 12 11	other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
19 13 01*	solid wastes from soil remediation
19 13 02	solid wastes from soil remediation
19 13 03*	sludges from soil remediation

EWC Code	EWC Description
19 13 04	sludges from soil remediation
19 13 05*	sludges from groundwater remediation
19 13 06	sludges from groundwater
20 02 02	Soil & Stone
20 03 03	Street Cleaning Residue

Substances contained within the wastes detailed in Table 1 include Total Petroleum Hydrocarbons (TPH), Poly Aromatic Hydrocarbons (PAH), Benzene, Toluene, Ethyl, Xylenes (BTEX), heavy metals, ammonia and amine concentrations, formaldehyde, and PCB's.

3. ACCIDENT MANAGEMENT PLAN

The Accident Management Plan (Table 2 overleaf) has adopted a risk assessment approach to each potential hazard by combining the probability and magnitude of the potential risk to give an estimation of the risk prior to any mitigation measures. The risk management measures, which are designed to reduce the likelihood of occurrence, are then detailed followed by an estimation of the actual risk post-mitigation (Residual Risk Rating).

The DEFRA guide to risk assessment indicates the approach of subjectively classifying the magnitude of potential consequences into four categories depending upon the degree of the impact that the potential risk could have and the context in which the risk is being assessed. The classification is used as a guide in this Risk Assessment.

The four categories are as follows:

• Severe: Possible irreparable damage to environmental resources;

• Moderate: Possible damage to environmental resources which are limited within a regional context;

• Mild: Possible effects might be transient damage to environmental resources which are commonplace on a regional basis and alternative sources are readily available;

• Negligible: The effects are negligible or might cause very slight temporary deterioration in the current environmental resource quality.

The matrix shown below considers the probability of the potential risk against the magnitude of the potential impact, thereby giving an estimation of the resulting likelihood of the risk occurring.

Table 2: Risk Estimation Matrix

Probability of Potential Risk	Magnitude of Potential Impact			
	Severe	Moderate	Mild	Negligible
High	High	High	Medium/Low	Near Zero
Medium	High	Medium	Low	Near Zero
Low	Medium	Medium	Low	Near Zero
Negligible	Medium	Medium/Low	Low	Near Zero

The qualitative risk assessment for the Accident Management Plan has been based on the matrix outlined above.

The final stage of the risk assessment is the judgement of the severity of the residual risk following implementation of the mitigation measures.

Table 3: Accident Management Plan

Accident Scenario	Probability of Accident Occurring	Magnitude of Potential Impact	Risk Rating before mitigation	Mitigation	Residual Risk Rating (following Mitigation)	Actions To Minimise Accident Impact
1 - Spills and Leaks / Loss of Containment / Transfer of Substances / Overfilling of Vessels	Medium	Moderate Spillage and leakage could occur during fuel deliveries, vehicle refuelling, vehicle breakdowns/ accidents and or damage to tanks or bunds; Loss of containment could result in potentially polluting liquids (including oils) being discharged in surface water drainage systems and to controlled waters;	Medium	• The treatment area is entirely sealed hardstanding with fully contained and sealed drainage and therefore considered to have a low potential for impacts to groundwater; • The water will drain to the onsite interceptor and through the water treatment system. There will be storage for reuse of this treated water. The discharge water will be tested regularly (at least monthly) and ensured safe for discharge to foul sewer. • The site will be bunded to ensure no unexpected drainage issues are encountered. • A sealed drainage and containment system for storage vessels containing potentially polluting liquids has been constructed so that any leaks / spills are contained; • All contaminated soil delivery areas are contained within a sealed drainage and containment system that incorporates appropriate falls and drains; • All storage vessels have been constructed to the appropriate British Standard;	Low	• Minor spills to be cleaned up immediately, using sand or proprietary absorbent. Resultant materials to be placed in container for off-site disposal to appropriate facility, if necessary; • Immediate action to be taken in event of major spill which is likely to cause polluting emissions to the environment to prevent liquid from entering surface water drains or any adjacent unsurfaced ground. Spillage to be cleared immediately and placed in containers for offsite disposal. EA to be informed; • The company has established accident and emergency procedures.

Accident Scenario	Probability of Accident Occurring	Magnitude of Potential Impact	Risk Rating before mitigation	Mitigation	Residual Risk Rating (following Mitigation)	Actions To Minimise Accident Impact
				• Tanks are inspected visually on a daily basis by site staff to ensure continued integrity of tanks, and identify any necessary remedial action;		
2 - Vandalism	Medium	Moderate The site could be subject to intentional vandalism and damage by intruders/ trespassers who could cause damage or harm to the plant and equipment, spills and leaks to tanks.	Medium	• On-site security measures: • Security lighting (on haul road to site) 24 hours a day; • Security cameras are installed at key areas of the Exeter site; • Security fencing extends around the site perimeter; • Lockable gates are located at the Exeter site entrance; • Gates will be locked whenever the site is closed; • Gates and fencing are inspected daily by operations staff to identify deterioration and damage and the need for repair; • Fencing and gates are maintained and repaired to ensure their continued integrity; • All visitors to the site are required to register in the visitor's book and sign out again on exit, thereby minimising the risk of unauthorised visitors on the site and; • Operational procedures have been implemented including regular inspections, ensuring continual monitoring of security provision at the site.	Low	• If damage is sustained, repair will be made within the same working day. If this is not possible, suitable measures will be taken to prevent unauthorised access to the site and permanent repairs will be affected as soon as is practicable.
3 - Flooding	Low:	Moderate	Medium	• The site is equipped with a sealed drainage and bunding systems which will prevent the	Low	• Emergency plans are regularly updated including evacuation routes.

Accident Scenario	Probability of Accident Occurring	Magnitude of Potential Impact	Risk Rating before mitigation	Mitigation	Residual Risk Rating (following Mitigation)	Actions To Minimise Accident Impact
	The site lies within Flood Zone 1 (low risk).			inflow of offsite flood water into critical areas (bunds, tanks, storage etc.). • Drainage systems are well maintained to handle heavy rainfall and prevent overflow.		
	Medium: Flooding during heavy rain events could risk contamination spreading offsite.	Severe: Offsite receptors could be exposed to leaching contaminants.	High	• Mitigating bunds designed to hold 1.5 x the calculated daily max rainfall; • Implemented drainage system designed into the slab and pumped through Water Treatment Plant (WTP).	Low	• Containment of water runoff from site and redirected to WTP; • Physical barrier to be implemented to prevent runoff from heavy rainfall; • Regular maintenance of slab to prevent of further leaching; • The EA will be advised of all incidents.
4 – Fire; Plant malfunction; Electrical equipment that could provide an ignition source; Waste products / raw materials that may support combustion.	Medium	Severe	High	• All mobile plant is subject to a planned preventative maintenance schedule and daily checks; • All mobile plant has been specified to be safe and earthed in accordance to best practice; • All aspects of the plant are constructed of non-combustible materials; • Containment system: all tanks and vessels containing flammable and potentially polluting liquids are constructed so that any leaks / spillages are contained and responded to in accordance with established emergency procedures;	Low	• In the event of a fire, the following actions will be taken: – The fire brigade will be notified immediately and the EA as soon as practicable. – The site will be immediately evacuated. • Records of fire incidences will be kept on site together with a summary of remedial action taken; • The EA will be advised of all incidents of fire as soon as is practicable.

Accident Scenario	Probability of Accident Occurring	Magnitude of Potential Impact	Risk Rating before mitigation	Mitigation	Residual Risk Rating (following Mitigation)	Actions To Minimise Accident Impact
				• Separation of combustible materials from the source prior to processing: – All waste is stored within the relevant stockpiles; – Any flammable process consumables shall be stored in bunded tanks. • Smoking will not be permitted in the operational area of the site; • Fire control systems (fire extinguishers, water suppression system); • Onsite security outside of work hours (nights and weekend); • All electrical equipment PAT tested.		
5 - Incompatible Feedstock / Unwanted Reactions: Some of the raw materials and waste inputs at the site could contain impurities that impede / prevent the recycling process.	Low	Moderate	Medium	The following methods will be implemented to ensure that incompatible feedstocks do not compromise the safe operation of the plant: • All waste accepted onto site will have been subject to 'pre-acceptance' in accordance with the sites waste acceptance procedures; • All incoming waste is inspected in accordance with the site's waste acceptance procedures;	Low	• Any non-conforming waste will be removed prior to acceptance in accordance with the sites waste rejection procedures. • Records of incidents involving incompatible will be kept on site together with a summary of the remedial action taken.
6 - Failure of Mains Services: Any short circuit and/or failure of electrical supplies affecting site	Medium	Low	Low	• Mains services are periodically inspected; • Aging or worn-out components are replaced to prevent unexpected breakdowns.	Negligible	• In the event of an electrical failure and / or short circuit the site has a dedicated Emergency Plan procedure (EP009 – Electrical Short Circuit / Failure) which will be followed.

Accident Scenario	Probability of Accident Occurring	Magnitude of Potential Impact	Risk Rating before mitigation	Mitigation	Residual Risk Rating (following Mitigation)	Actions To Minimise Accident Impact
equipment, computers, welfare and general equipment.						
7 - Operator Error / Failure of Equipment. The unexpected breakdown of any part of the plant could result in short term build-up of waste in the reception area or the incomplete processing of waste. The result of operator error could result in the plant not functioning efficiently.	Medium	Low	Low	• The waste will only be stored on site for a maximum of 30 days prior to treatment; • All equipment is subject to a Planned and Preventative Maintenance Programme (PPM), to minimise unplanned failures.	Negligible	• Should the above storage capacity be exceeded, incoming waste will be diverted off site.
8 – Uncontrolled release of asbestos fibres during asbestos containing materials handling, handpicking, loading and storage.	High	Severe	High	• Only authorised personnel with suitable training to undertake task. • Material stockpiled in quarantine bay, sheeted with LDPE. • Correct PPE to be worn including appropriate gloves, and overalls. • RPE include FFP3 face fits mask – operatives to be clean shaven.	Low	• Raise alarms in event of asbestos release. • Evacuate and contain the area, ensuring all persons are excluded from the affected area. • Dust suppression systems used to reduce the airborne fibres and dust particles, and dust monitors placed in affected area. • All people, clothing and PPE contaminated by asbestos fibres, must be decontaminated or disposed of.

Accident Scenario	Probability of Accident Occurring	Magnitude of Potential Impact	Risk Rating before mitigation	Mitigation	Residual Risk Rating (following Mitigation)	Actions To Minimise Accident Impact
				• Dust suppression and dampening down methods to be used throughout asbestos activities. • Picked Asbestos material to be double bagged within appropriately UN approved asbestos bags and placed into a secure lockable Asbestos Skip/secure location, then removed to a licenced facility under appropriate duty of care. • Asbestos area to be fenced off and signage placed. • Plastic membrane to be placed back over the stockpile at the end of each shift. • Use of dust monitors to monitor affected area for asbestos fibre.		• Ensure new and clean PPE and RPE are fitted correctly. • Records of incidents involving uncontrolled release will be kept on site for performance improvements.

3.1 Accident record

In the event of an accident occurring. The accident is recorded in an Incident Report Form (CR-10-009 Incident Report Form) (included in Appendix 1). This process opens an investigation into the incident, focusing on potential impacts, including health & safety and environment impacts. Immediate action taken is recorded, including a summary of the response to the accident.

If the accident constitutes a breach to the permit, the Environment Agency will be notified as soon as practicable.

4. SUMMARY AND CONCLUSIONS

This document has been prepared to meet the requirements pertaining to EA Guidance document 'Develop a Management System: Environmental Permits'.

It is concluded that despite the Installation having the potential for a low-moderate impact to the environment, the mitigation measures incorporated into the design of the plant and the site infrastructure are sufficient to mitigate the risk of accidents, and to control accidents should they arise.

The company will operate using a suite of procedures for the control and management of all materials and plant in use at the facility.

These procedures will detail the required actions to be taken in the event of an emergency and should be used in the first instance for any accident and emergency at site.

Incident Report Form

CAR Number:

Project Details	
Project Name:	**Project Supervisor:**

Incident Details	
Incident Date:	
Incident Time:	
Report By:	
Weather Conditions:	
Lighting Conditions:	

Primary Company Involved	Potential Impacts
☐ UK REMEDIATION ☐ Contractor (name):	☐ Health / Safety ☐ Environment ☐ Quality/Reputation ☐ Security ☐ Other

Description of Incident (Who, What, Why, When, Where event happened):

Operation in Progress

☐ Commissioning (Start up)	☐ Drilling	☐ Monitoring	☐ Shutting Down
☐ Construction	☐ Inspection	☐ Normal Operation	☐ Testing (pilot or slug)
☐ Demolition	☐ Maintenance (O&M)	☐ Product Handling	☐ Transporting.
☐ Domestic	☐ Material Handling	☐ Disposal	☐ Other (describe belov

Description of Immediate Action Taken:

Submitted/Review Information

Submitted By: Date:

Reviewed By: Date:

Reviewed By:

Distribution

☐ Director	☐ Project Manager	☐ H & S Manager	☐ Other (Specify)