

ACCIDENT MANAGEMENT PLAN

Fernbrook Bio Limited



Helping clients prosper through compliance



SITE DETAILS

Fernbrook Bio Limited

Rothwell Lodge AD Facility

Rothwell Lodge Farm

Rothwell Road

Kettering

Northamptonshire

NN168XF

OPERATOR DETAILS

Fernbrook Bio Limited

Fernbrook Bio

Rothwell Road

Kettering

England

NN168XF

PERMIT REFERENCE

EPR/EP3894SC

DOCUMENT REFERENCE

K114.1~11~002

ISSUE DATE

29/07/2022



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DOCUMENT CONTROL

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REVISION HISTORY

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K114.1~11~002/V1	21/08/2009	01	Final draft to accompany Permit application	
K114.1~11~002/V2	26/11/2012	Amendments following letter from Pat Kelly (E dated 23/10/12 (ref: K114.1~04); incorporation to changes to the ERA to incorporate information to odour mitigation.		
K114.1~11~002/V3	30/04/2014	03	Amendments following meeting with Pat Kelly (Exon 05/11/13; changes to Odour Management Plato include reference to action levels, and to reflet improvements to odour management technique Review against How to comply with your perm Additional guidance for anaerobic digestion (v1. Nov 2013)	
K114.1~11~002/V4	30/04/2015	04	Amended to incorporate 'gas clean up' technology applied for through permit variation reference: EPR/EP3894/V003.	
K114.1~11~002/V5	15/05/2015	05	Amendments following comments from determining officer during 'Duly Made' stage of permit variation application to reflect Fire Prevention Plan Guidance.	
K114.1~11~002/V6	16/10/2017	06	Amendments following client instruction to review existing Management System documentation, change in ownership, change in EA guidance and	



REFERENCE:	DATE	ISSUE	REVISION SUMMARY	
			following independent review of incident in April 2017.	
K114.1~11~002/V7	30/03/2021	D7	Amendments following installation of gas upgrading equipment.	
K114.1~11~002/V8	28/05/2021	08	Amendments following installation of thermal oxidizer.	
K114.1~11~002/V9	27/07/2022	09	Amendments in line with proposed changes in Substantial Variation application.	

QUALITY CONTROL

ACTION	DATE	NAME
Prepared	25/07/2022	Elliott Howard
Checked	27/07/2022	Josh Freeman
Approved	27/07/2022	Graeme Outridge



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Appendix B	Incident Response Plan (K114.1~09~011)



1 INTRODUCTION

This document forms an Appendix to the site's Management Plan (K114.1~09~006) that supports the bespoke Environmental Permit operated by Fernbrook Bio Limited at Rothwell Lodge Farm, Rothwell Road, Kettering, Northamptonshire, NN16 8XF.

This Accident Management Plan should be read in conjunction with the site's Management Plan and other supporting Management System documents.

The previous Accident Risk Assessment & Management Plan was originally written to accompany the permit application and had been updated in February 2014 to reflect improvements to odour abatement measures and had been further updated in April 2015 to reflect the addition of 'gas clean up' technology for the production of biomethane.

This latest revision is to support the proposed changes detailed as part of a Substantial Variation application.

1.1 Scope

The site is operated in accordance with policies, plans, procedures and practices outlined within the Management Plan.

This Accident Management Plan assesses the operations at the site at the time of writing and is based upon observations made and a desk study. This assessment relies upon information provided by Fernbrook Bio Ltd and White's Recycling Ltd, combined with the findings of the independent review following the incident involving Digester 2 in April 2017.

The Accident Management Plan has been produced in accordance with the Environment Agency's environmental management system guidance:

Develop a management system: Environmental Permits¹

1.2 Aims

This assessment aims to identify potential accidents, environmental hazards, sensitive receptors to those hazards and the influence of site management practices for reducing risk.

¹ <u>Develop a management system: environmental permits - GOV.UK, 1st February 2016 (updated 4th August 2021)</u>



1.3 Review

The Accident Management Plan has been reviewed and updated following the change in ownership in 2016, and where further changes are identified to either current or future operations the document will be amended accordingly.

Following the incident in April 2017 which resulted in damage to Digester 2, an independent review was commissioned by the operator to investigate the root cause(s), provide advice on how to prevent a further incident and identify where existing management practices needed to be reviewed and improved.

The findings from the review of the incident were used by the operator to inform the scope of works to update the Management Plan and the Incident Response Plan (K114.1~09~011, Appendix B); before developing the emergency procedures for Digester Tank Rupture Emergency Response and Disaster Escalation Procedure (see Appendix to Incident Response Plan, K114.1~09~011).

A 'toolbox talk' entitled Avoiding & Managing Incidents was developed by the operator to reinforce the lessons learned following the incident and this presentation was trained out along with the updated emergency response procedures with the site team.

The review of the incident identified a number of priority areas for improvement, including:

- Temperature/heating measurement and control
- Mixing/grit control
- Feed measurement and control
- Waste Acceptance Procedure
- Pressure monitoring and safety devices
- Site documents, daily records and maintenance records
- Management of bubbling and foaming

The revised site's Management Plan (K114.1~09~006) and Standard Operating Procedures (SOPs) (see Management Plan, Appendix A) have been developed incorporating the recommendations of the independent review and following the retrofitted installation of additional temperature probes and pressure sensors in Digester 1.



2 SITE SETTING

2.1 Location

The site is located at Rothwell Lodge Farm, Rothwell Road, Kettering, Northamptonshire, NN16 8XF, at NGR SP 82389 80138. Lying approximately 600 m south of Rothwell, 1.1 km northwest of Thorpe Malsor, 1.3 km northeast of Loddington, and 1.5 km northeast of Orton. The site covers an area of 2.33 hectares. Access to the site is gained directly from the west bound A14.

2.2 Environmental Setting

2.2.1 Geology

Review of the geological map for the area reveals that the local area is formed in deposits of Northampton Sands, which in turn are overlying the Upper Lias Clays. It is estimated that the depth of the Northampton Sands is less than 5 m and that the Upper Lias Clays extend to depths in excess of 50 m. Records suggest that significant areas of the site have been subject to open cast mining to exploit iron deposits within the Northampton Sands, and subsequently backfilled with quarry spoil.

2.2.2 Groundwater and Surface Water

The site is located over a Secondary A Aquifer but not within a Source Protection Zone. The closest surface water course is the Slade Brook approximately 500 m to the north of the site. The Thorpe Malsor reservoir is approximately 500 m to the south.

2.2.3 Flood Risk

The site is located within Flood Zone 1 where the probability of flooding at the site is regarded as Very Low; additionally, given the secondary containment measures installed for water management, the site will not further contribute to flood risk further downstream.

2.2.4 Air Quality

The site does not fall within an Air Quality Management Area (AQMA). However, site design incorporates a dedicated air quality management system for the management of odours and bio-aerosols which is described within the separate Odour Management Plan.

2.3 Nature Conservation

There are no designated conservation sites within 2 km of the site.

- Talby Meadow Local Nature Reserve lies 2730 m to the north northwest;
- River Ise & Meadows SSSI 4330 m to the northeast:



- Alder Wood and Meadow SSSI lies 4560 m to the north northeast; and
- Birch Spinney and Mawsley Marsh SSSI lies 3260 m to the south southwest of the site.

2.4 Nature of the Risk Assessment

This document provides a broad and general assessment of the risk factors considered to be of importance for an anaerobic digestion facility. The supporting documents detailed below provide more specific evaluation of impact from the principle risk factors to receptors within the site vicinity.

2.5 Supporting Information

In support of the planning application originally submitted for the site various reports were produced. Several of these documents are of relevance and have been used in undertaking this risk assessment.

- Ground Investigation Report (Prepared by Soiltechnics Ltd)
- Ground pollution prevention and control (Prepared by JPP Consulting Ltd)
- Dust and Odour Assessment (Prepared by STATS)
- Flood Risk Assessment (Prepared by JPP Consulting Ltd)
- Noise Impact Assessment (Prepared by STATS Ltd)
- Ecological Appraisal (Prepared by The Landscape Partnership)

This document is also supported by: the Environmental Risk Assessment (K114.1~11~001) and the Management Plan (K114.1~09~006).



3 METHODLOGY

3.1 Process and Accident Identification

Accidents present the possibility of hazards which have potential to cause harm to something else. For example, there is potential for vehicle breakdown to result in oil spill. This then presents a risk of pollution to groundwater for example. This document provides a broad assessment of the potential hazards resulting from accidents that may occur at the site. The processes and potential accidents are presented in Table 1 below:

Table 1. Identified Processes and Accidents

PROCESS	ACCIDENT		
Waste Inputs	 Vehicle or machinery breakdown and associated escape of oils. Escape of wastes. 		
Waste Storage	 Mixing of incompatible wastes resulting in excess gas production and foaming. Plant mechanical failure and associated overfilling of storage tanks. Damage to storage tanks by vehicles on site. 		
Waste Processing	 Vehicle or machinery breakdown and associated escape of oils. Damage to process tanks by vehicles on site. Plant mechanical failure and associated cessation in material processing. 		
Gas treatment and/or upgrading	 Damage to the biogas upgrading unit by vehicles on site. Plant mechanical failure and associated cessation in biogas treatment. 		
Ancillary Operations	 Spillage of stored chemicals or oils. Escape of oils during servicing operations. Escape of oils during filling operations. Fire during filling or decanting operations. 		
Environmental Factors	Lightning strike.Heavy rain.Prevailing winds.		
Other Factors	Vandalism or unauthorised access.		



3.2 Receptors

A receptor is the person, organism, resource or property impacted by a hazard. For example, odour may cause offence to a human (the receptor). The above hazards have been assessed in terms of their general impact on principle receptor types identified within the vicinity. In summary these receptors may be described in Table 2 below.

 Table 2. Receptor Description

RECEPTOR TYPE	DESCRIPTION	NEAREST LOCATION FROM SITE (APPROX)	DIRECTION OF NEAREST LOCATION FROM SITE
Humans and	Site Workers	On site	On site
Property	Site Visitors	On site	On site
	Inhabitants of residential property:		
	Rothwell Lodge Farmhouse	<50 m	E
	Columbus Crescent, Rothwell	560 m	NW
	Reservoir Cottage	725 m	SE
	Orton / Binders Lodge	830 m	SW
	Users of commercial property:		
	Esso filling station & McDonalds restaurant	65 m	N
	Public Right of Way		
	(FP UH3 ² &	130 m	W
	FP UH1 ³)		N
Surface	Slade Brook	515 m	N
Water	Trib. to Slade Brook	580 m	W
	Thorpe Malsor reservoir	525 m	S/SW

 $^{^{\}rm 2}$ Terminates at Rothwell Lodge Farm and runs away from site to the south west

³ To the north of the site on the opposite side of the A14



RECEPTOR TYPE	DESCRIPTION	NEAREST LOCATION FROM SITE (APPROX)	DIRECTION OF NEAREST LOCATION FROM SITE
Groundwater	Secondary A Aquifer though not within a Source Protection Zone	Beneath Site	Beneath Site
Protected	Talby Meadow LNR	2730 m	NNW
nature conservation	River Ise & Meadows SSSI	4330 m	NE
sites (SAC, SPA, SSSI, etc.)	Alder Wood and Meadow SSSI	4560 m	NNE
	Birch Spinney and Mawsley Marsh SSSI	3260 m	SSW
Highways	A14	<20 m	N
Agricultural Land	Agricultural fields and property.	Adjacent to site	S, E & W
Atmosphere	Atmosphere	Surrounding	Surrounding



3.3 Pathways

The pathway is the means by which the hazard reaches the receptor and forms the link between the two. For example, an odour hazard may reach a human receptor by travelling through air, with the air therefore being the pathway.

The source-pathway-receptor link must be present for there to be a risk. Management measures applied at the site may minimise the overall risk by impeding the pathway.

3.4 Assessment Of Risk

Assessment of risk is based on the probability of receptor exposure to the identified hazards and the consequences of such exposure. The initial assessment of risk is made assuming no risk management practices are applied. A matrix is used to determine overall risk and uses the following definitions in Tables 3 and 4 below:

Table 3. Probability of Exposure

PROBABILITY OF EXPOSURE

HIGH – exposure is probable: direct exposure likely with no / few barriers between hazard source and receptor.

MEDIUM – exposure is fairly probable: feasible exposure possible, barriers to exposure less controllable.

LOW – exposure is unlikely: several barriers exist between hazards source and receptors to mitigate against exposure.

VERY LOW – exposure is very unlikely; effective, multiple barriers in place to mitigate against exposure.

Table 4. Consequences of Exposure

CONSEQUENCES OF EXPOSURE

HIGH – the consequences are severe: sufficient evidence that short or long-term exposure may result in serious damage

MEDIUM – consequences are significant; sufficient evidence that exposure to hazard may result in damage that is not severe in nature and reversible once exposure ceases (e.g. irritant).

LOW - consequences are minor; damage not apparent though reversible adverse changes may occur.

VERY LOW – consequences are negligible; no evidence of adverse changes following exposure.



Comparison between probability and consequence provides the overall risk which is presented in Table AM5 below:

Table 5. Assessing Overall Risk

		CONSEQUENCES				
		Very Low	Low	Medium	High	
>	High	Low	Medium	High	High	
PROBABILITY	Medium	Low	Medium	Medium	High	
	Low	Low	Low	Medium	Medium	
	Very Low	Very Low	Low	Low	Low	

3.5 Risk Management

Risk management practices for the key hazards identified are summarised in tables AM6 to AM12. The information presented below is supported by various documents within the Management System and this is clearly indicated within each table presented. Moreover, risk management practices have been developed with reference to relevant guidance documents, the following being of particular note:

- Develop a management system: Environmental Permits (February 2016, updated August 2021) - https://www.gov.uk/guidance/develop-a-management-system-environmental-permits).
- Control and monitor emissions for your environmental permit (February 2016, updated May 2021) - https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit.
- Sector Specific Guidance Environment Agency
 - o EPR 5.06 Treatment and storage of hazardous and non-hazardous waste.
- Horizontal Guidance Environment Agency
 - o H4 Odour.
- Monitoring Technical Guidance Notes Environment Agency
 - M1 sampling requirements for stack emissions monitoring (published 3rd August 2017);
 - Monitoring stack emissions: techniques and standards for periodic monitoring (16th February 2021) (formerly M2 & M16);
 - M8 Monitoring ambient air (published 7th April 2014); and



- M17 monitoring ambient particulates in air around waste facilities (published 7th April 2014).
- An Industry Guide for the Prevention and Control of Odours at Bio-waste Processing Facilities. Organics Recycling Group (formerly Composting Association).
- Groundwater protection guides covering: requirements, permissions, risk assessments and controls (previously covered in GP3): https://www.gov.uk/government/collections/groundwater-protection
- Environmental Permitting (England and Wales) Regulations 2016 (as amended).

3.6 Residual Risk

The application of management practices results in a residual risk which is detailed in each of the tables (6 to 12) presented below.



4 ACCIDENT MANAGEMENT

Processes identified and the associated potential accidents are assessed in the following separate tables (AM6 to AM12). The information presented is supported by various Management System documents which are clearly indicated within each table.

In the event of any such accident, the Incident & Accident Form (EP01/F01) (Appendix A) should be completed in accordance with Incidents and Accidents (EP01) and if necessary, the Incident Response Plan (K114.1~09~011, Appendix B) initiated and followed.

Additionally, where the incident or accident involves a breach of the site's Environmental Permit, a Schedule 6 – Notification Report should also be completed and submitted without delay to the Environment Agency in accordance with Condition 4.3.1 and Section 11.2 of the Management Plan.

Many of the hazards identified in the following tables relate to 'Environmental Risk Points (ERP)' identified throughout the anaerobic digestion process (see Figure 1 below).



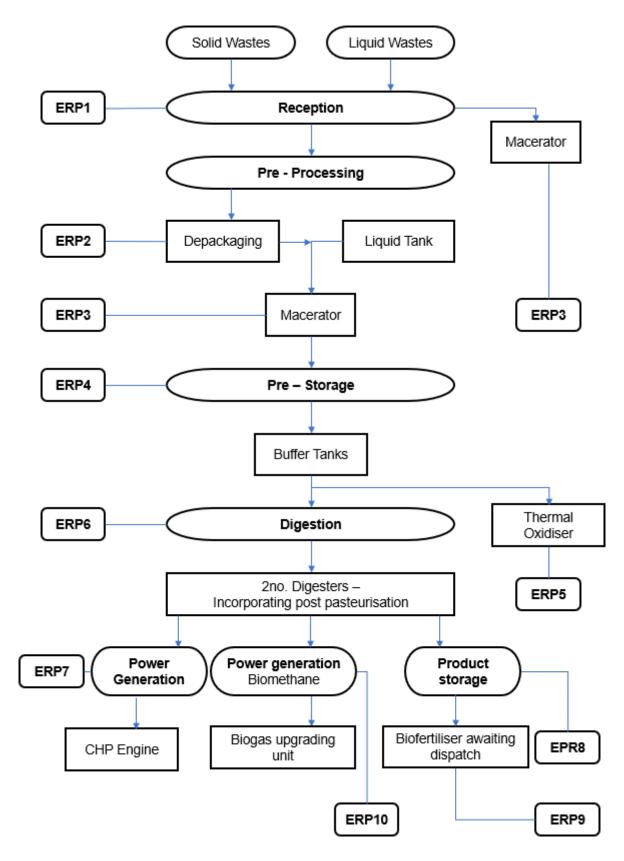


Figure 1. Locations Of Environmental Risk Points



Table 6. Waste Inputs

IDENTIFYING	THE HARM AND W	/HAT COULD BE	HARMED	AS	SSESSING THE RISH	(MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?		What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
ERP1 – ERP5 Waste Inputs	Vehicle or machinery breakdown and associated escape of oils. Deterioration of water quality.	Groundwater & Surface Water (nearest water course Slade Brook 515 m north, Trib. to Slade Brook 580 m west & Thorpe Malsor reservoir 525 m southwest; ove a Secondary A Aquifer but not within SPZ). Humans (Rothwell Lodge Farm	Through the ground or direct run-off to surface waters.	LOW	MEDIUM	MEDIUM	 All reception and pre-processing activities undertaken over impermeable surfaces (SOP001 – Waste Reception and SOP003 – Pre-Digestion Processing); Internal areas drain to sealed drainage system (Drainage Layout drawing E02 Rev C); All external surface water directed to soakaway via class 1 bypass separator. Site surfacing impermeable and maintained to a high standard (SOP021 – Site Daily Checks); Vehicles and equipment maintained to high standard (SOP011 – Process Inspection & Maintenance; Spill measures in place (Incidents and Accidents (EP01), Incident Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); Visiting vehicle turnaround is swift minimising time on site. 	LOW	
	Escape of wastes. Deterioration of water quality, odour nuisance.	<50 m, Rothwell 560 m northwest), users of vehicle filling station & restaurant (65 m north).	Through the ground or direct run-off to surface waters. Air	LOW	MEDIUM	MEDIUM	 Feedstock held within sealed tanks (SOP004 – Feedstock Storage); Tanks constructed on reinforced concrete slab; Tanks within bunded area with a capacity of >5500 m³ (110% of largest tank) (SOP002 – Waste Storage and SOP008 – Storage of Digestate); 	LOW	



IDENTIFYING	THE HARM AND W	HAT COULD BE	HARMED	AS	SSESSING THE RISH	(MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?		What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
							 Process subjected to automated control; when defined thresholds are breached alarms are triggered (SOP010 – Process Control and SOP016 - Preventing Foam); Recirculation of contaminated water back through process or disposal at suitable facility as required (SOP021 – Site Daily Checks); Float switch alarm system indicates significant leaks, and triggers closure of motorised sluice gates to prevent uncontrolled discharge (Incidents and Accidents (EP01), Incident Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); Spill measures in place (Incidents and Accidents (EP01), Incident Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); Covered vehicles. 		



Table 7. Waste Storage

IDENTIFYING	IDENTIFYING THE HARM AND WHAT COULD BE HARMED				SSESSING THE RIS	К	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?		What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
ERP4 Waste Storage	Odour nuisance, structural damage,	(Rothwell Lodge Farm <50 m, Rothwell 560 m	Air	LOW	MEDIUM	MEDIUM	 All wastes come from known sources with precharacterisation checks having been completed prior to delivery (Waste Acceptance Procedure, Protocol for Accepting Liquid Waste); pH monitoring of incoming liquid loads SOP020 – pH Determination of Liquid Loads); Retrofitted installation of additional temperature probes to Digester 1; Provision of additional training to site staff including Avoiding & Managing Incidents presentation; 	LOW	



IDENTIFYING	THE HARM AND W	WHAT COULD BE	HARMED	Δ	SSESSING THE RIS	К	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?		What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
	Plant mechanical failure and associated overfilling of storage tanks. Odour nuisance, structural damage, explosion.	Aquifer but not within SPZ).					 Development of emergency procedures and implementation of <i>Incident Response Plan</i> (K114.1~09~011); Process subjected to automated control so when defined thresholds are breached alarms are triggered (SOP010 – Process Control, Maintenance Procedure for Digester Bursting Disk & Bursting Disk Valve and SOP016 - Preventing Foam); Carbon filters & scrubber form integral part of process (SOP012 – Odour Control and SOP023 – Monitoring Output from Carbon Filters); Storage periods are minimised by business objectives; Smoking in designated areas only; Pre-storage tanks allow any incompatible wastes to be isolated from main process (SOP004 – Feedstock Storage, SOP006 – Digester Monitoring and SOP016 – Preventing Foaming); Fire procedures are in place (Incident Response Plan K114.1~09~011); No burning undertaken on site (SOP021 – Site Daily Checks). 	LOW	

IDENTIFYING	THE HARM AND W	/HAT COULD BE	HARMED	A	ASSESSING THE RIS	K	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?	What hazard is associated with potential accident?	What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
	Storage tank strike by vehicle or plant machinery, loss of structural integrity Odour nuisance, deterioration of water quality		Through the ground or direct run-off to surface waters.	LOW	MEDIUM	MEDIUM	 Speed limit in place throughout site; Tanks isolated from vehicles by bunds; Tanks constructed on reinforced concrete slab; Tanks within bunded area with a capacity of >5500m³ (110% of largest tank) (SOP002 – Waste Storage and SOP008 – Storage of Digestate); Process subjected to automated control with storage volumes monitored and if breached alarms are triggered (SOP010 – Process Control, Maintenance Procedure for Digester Bursting Disk & Bursting Disk Valve and SOP016 - Preventing Foam). 	LOW	
	Storage of digestate ⁴ Odour nuisance, deterioration of water quality			LOW	MEDIUM	MEDIUM	 Liquid digestate stored in sealed tanks (SOP008 – Storage of Digestate); All loads leaving site are visually checked to ensure adequate loading for secure transport (SOP021 – Site Daily Checks). 	LOW	

⁴ (NB <u>NOT</u> waste when produced according to QP & PAS110)



Table 8. Waste Processing

IDENTIFYING	THE HARM AND	WHAT COULD BE	HARMED		ASSESSING THE RIS	SK	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?	What hazard is associated with potential accident?	What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
	Vehicle or machinery breakdown and associated escape of oils. Deterioration of water quality.	Groundwater & Surface Water (nearest water course Slade Brook 515 m north, Trib. to Slade Brook 580 m west & Thorpe Malsor reservoir 525 m southwest; over a Secondary A Aquifer but not within SPZ). Humans and property (Rothwell Lodge Farm <50 m, Rothwell 560 m northwest), users of vehicle filling station & restaurant (65 m north)	Through the ground or direct run-off to surface waters.	LOW	MEDIUM	MEDIUM	 Site surfacing impermeable and maintained to a high standard (SOP021 – Site Daily Checks); All reception and pre-processing activities undertaken over impermeable surfaces (SOP001 – Waste Reception and SOP003 – Pre-Digestion Processing); Internal areas drain to sealed drainage system (Drainage Layout drawing E02 Rev C); All external surface water directed to soakaway via class 1 bypass separator (SOP021 – Site Daily Checks and Drainage Layout drawing E02 Rev C); Vehicles and equipment maintained to high standard (SOP011 – Process Inspection & Maintenance); Spill measures in place (Incidents and Accidents (EP01), Incident Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); Visiting vehicle turnaround is swift minimising time on site. 	LOW	



IDENTIFYING	THE HARM AND	WHAT COULD BE	HARMED		ASSESSING THE RIS	SK	MANAGING THE RISK	
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk
What process gives rise to potential accident?	What hazard is associated with potential accident?	What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?
	Plant breakdown and associated cessation of process Release to air, deterioration of water quality		Through the ground or direct run-off to surface waters. Air	LOW	MEDIUM	MEDIUM	 All plant maintained in accordance with manufacturer's specifications (SOP011 – Process Inspection & Maintenance); Maintenance support provided by equipment supplier; Stock of critical spare parts held; CHP plant allows controlled combustion of excess gases produced Incidents and Accidents (EP01) and Incident Response Plan K114.1~09~011); Wastes re-directed to alternative treatment facilities (Incident Response Plan K114.1~09~011); Site surfacing impermeable and maintained to a high standard (SOP021 – Site Daily Checks). 	LOW
	Process tank strike by vehicle or plant machinery, loss of structural integrity Odour nuisance, deterioration of water quality		Through the ground or direct run-off to surface waters.	LOW	MEDIUM	MEDIUM	 Speed limit in place throughout site; Tanks isolated from vehicles by bunds; Tanks constructed on reinforced concrete slab; Tanks within bunded area with a capacity of >5500m³ (110% of largest tank) (SOP002 – Waste Storage and SOP008 – Storage of Digestate); Process subjected to automated control with storage volumes monitored and if breached alarms are triggered (SOP010 – Process Control, Maintenance Procedure for Digester 	LOW

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IDENTIFYING THE HARM AND WHAT COULD BE HARMED			ASSESSING THE RISK			MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk
at process gives ise to potential accident?	What hazard is associated with potential accident?		How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?
							Bursting Disk & Bursting Disk Valve and SOP016 - Preventing Foam).	



Table 9. Gas Treatment and/or Upgrading

IDENTIFYING	THE HARM AND	O WHAT COULD BE HA	ARMED		ASSESSING THE R	SK	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?	What hazard is associated with potential accident?	What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
ERP6 Gas treatment and/or upgrading	Escape of liquids during servicing operations. Deterioration of water quality.	Groundwater & Surface Water (nearest water course Slade Brook 515 m north, Trib. to Slade Brook 580 m west & Thorpe Malsor reservoir 525 m southwest; over a Secondary A Aquifer but not within SPZ).	Through the ground or direct run-off to surface waters.	LOW	MEDIUM	MEDIUM	 Equipment housed within secured container (SOP021 – Site Daily Checks); Servicing undertaken in line with manufacturer's guidance; Spill measures in place (Incidents and Accidents (EP01), Incident Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); Internal surfacing impermeable and drain to sealed drainage system (SOP021 – Site Daily Checks and Drainage Layout drawing E02 Rev C). 	LOW	
	Fire due to failure in operation. Damage to health, Loss of life, Property destruction.	Humans and property (Rothwell Lodge Farm <50 m, Rothwell 560 m northwest), users of vehicle filling station & restaurant (65 m north) Surrounding land (largely agricultural)	Spread through physical contact; fanned by winds	LOW	HIGH	MEDIUM	 Emissions to air would be short term impact (Incidents and Accidents (EP01) and Incident Response Plan K114.1~09~011); Smoking in designated areas only; A high level of site maintenance is ensured (SOP011 – Process Inspection & Maintenance); Fire procedures are in place (Incident Response Plan K114.1~09~011); No burning undertaken on site (SOP021 – Site Daily Checks); 	LOW	

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IDENTIFYING	THE HARM AND	WHAT COULD BE H	ARMED		ASSESSING THE RI	SK	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?		What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
							Treatment container located in an isolated location so would not impact other components of the process.		



Table 10. Ancillary Operations

IDENTIFYING	IDENTIFYING THE HARM AND WHAT COULD BE HARMED				SSESSING THE R	ISK	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?		What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
Ancillary Operations	Spillage of stored chemicals or oils. Deterioration of water quality.	Groundwater & Surface Water (nearest water course Slade Brook 515 m north, Trib. to Slade Brook 580 m west & Thorpe Malsor reservoir 525 m southwest; over a Secondary A Aquifer but not within SPZ). Humans and property (Rothwell Lodge Farm <50 m, Rothwell 560 m northwest), users of vehicle filling station & restaurant (65 m north) Surrounding land (largely agricultural)	Through the ground or direct run-off to surface waters.	LOW	MEDIUM	MEDIUM	 All chemicals / oils are stored in small quantities in secure containers either within buildings or bunded tanks meeting regulatory requirements (SOP021 – Site Daily Checks); Spill measures in place (Incidents and Accidents (EP01), Incident Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); Limited access to such materials; All reception, processing & storage activities undertaken over impermeable surfaces (SOP021 – Site Daily Checks, SOP001 – Waste Reception, SOP002 – Waste Storage and SOP008 – Storage of Digestate); Internal areas drain to sealed drainage system (Drainage Layout drawing E02 Rev C); All external surface water directed to soakaway via class 1 bypass separator. Site surfacing impermeable and maintained to a high standard (SOP021 – Site Daily Checks and Drainage Layout drawing E02 Rev C). 	LOW	



IDENTIFYING	IDENTIFYING THE HARM AND WHAT COULD BE HARMED				SSESSING THE R	ISK	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?	What hazard is associated with potential accident?	What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
	Escape of oils during servicing operations. Deterioration of water quality.			LOW	MEDIUM	MEDIUM	 Equipment housed within buildings (SOP021 – Site Daily Checks); Servicing undertaken in line with manufacturer's guidance (SOP011 – Process Inspection & Maintenance); Provision made for storage of waste oil products prior to disposal (SOP002 – Waste Storage); 	LOW	
	Escape of oils during filling operations. Deterioration of water quality.			LOW	MEDIUM	MEDIUM	 Spill measures in place (Incidents and Accidents (EP01), Incident Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); Internal surfacing impermeable and drain to sealed drainage system (SOP021 – Site Daily Checks and Drainage Layout drawing E02 Rev C). 	LOW	
	Fire during filling or decanting operations. Damage to health, Loss of life, Property destruction.		Spread through physical contact; fanned by winds	LOW	HIGH	MEDIUM	 No filling of petroleum fuels undertaken on site; Minimum quantities decanted for necessary maintenance (SOP011 – Process Inspection & Maintenance); Emissions to air would be short term impact (Incidents and Accidents (EP01) and Incident Response Plan K114.1~09~011); Storage periods are minimised by business objectives; Smoking in designated area only; 	LOW	

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IDENTIFYING THE HARM AND WHAT COULD BE HARMED			ASSESSING THE RISK			MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk
What process gives rise to potential accident?	What hazard is associated with potential accident?		How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?
							 Wastes stored within secure areas (SOP002 – Waste Storage); A high level of site maintenance is ensured (SOP011 – Process Inspection & Maintenance); Fire procedures are in place (Incident Response Plan K114.1~09~011); No burning undertaken on site (SOP021 – Site Daily Checks). 	



Table 11. Environmental Factors

IDENTIFYING THE HARM AND WHAT COULD BE HARMED				ASSESSING THE RI	SK	MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk
What process gives rise to potential accident?		What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?
	Lightning strike Odour nuisance, structural damage, explosion.	Groundwater & Surface Water (nearest water course Slade Brook 515 m north, Trib. to Slade Brook 580 m west & Thorpe Malsor reservoir 525 m southwest; over a Secondary A	Air	LOW	HIGH	MEDIUM	 Site-specific DSEAR Assessment completed in 2016; Earthing strips fitted to digesters; DSEAR Zones established and DSEAR Zone Plan available onsite; DSEAR Awareness training provided to operational staff. 	LOW
Environmental Factors	Very Heavy Rain Deterioration of water quality.	Aquifer but not within SPZ). Humans and property (Rothwell Lodge Farm <50 m, Rothwell 560 m northwest), users of vehicle filling station & restaurant (65 m north) Surrounding land	Through the ground or direct run-off to surface waters.	LOW	MEDIUM	MEDIUM	 All wastes stored within covered tanks (SOP002 – Waste Storage); Site surfacing impermeable and well maintained (SOP021 – Site Daily Checks); Surface water drainage system designed to accommodate 1 in 100-year storm (Drainage Layout drawing E02 Rev C); Tanks within bunded area with a capacity of >4400m³ (110% of largest tank) (SOP002 – Waste Storage and SOP008 – Storage of Digestate); Float switch alarm system indicates significant leaks and triggers closure of motorised sluice gates to prevent uncontrolled discharge (Incidents and Accidents (EP01), Incident 	LOW

IDENTIFYIN	IDENTIFYING THE HARM AND WHAT COULD BE HARMED			ASSESSING THE RISK			MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?	What hazard is associated with potential accident?	What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains	What measures will you take to reduce the risk? If it occurs, who is responsible for what?	What risk remains following the application of management measures?	
		(largely agricultural)					Response Plan (K114.1~09~011) and associated appendices: Digester Tank Rupture Emergency Response and Disaster Escalation Procedure); • Bunded area around tank provides emergency storage capacity during storm conditions.		
	Prolonged winds in receptor direction. Odour nuisance.		Air	LOW	MEDIUM	MEDIUM	 All wastes stored within covered tanks (SOP002 – Waste Storage); All waste is pumped directly into tanks (SOP010 – Process Control); Tanks set into ground reducing exposure to strong winds; Topography to the immediate south higher than buildings and tanks providing additional protection. 	LOW	



Table 12. Other Factors

IDENTIFYING THE HARM AND WHAT COULD BE HARMED				ASSESSING THE RISK			MANAGING THE RISK		
Process	Hazard	Receptor	Pathway	Probability	Consequence	Overall Risk	Management Practice	Residual Risk	
What process gives rise to potential accident?	What hazard is associated with potential accident?	What is the risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains		What risk remains following the application of management measures?	
Other Factors	Vandalism or unauthorised access Substance spills, fires Deterioration of water quality, damage to health, loss of life, property damage, litter nuisance, odour nuisance	Slade Brook 515 m north, Trib. to Slade Brook 580 m west & Thorpe Malsor reservoir 525 m southwest; over a Secondary A Aquifer but not within SPZ).0 Humans and property (Rothwell Lodge Farm <50 m, Rothwell 560 m northwest), users of	Through the ground or direct run-off to surface waters, air and physical transport and deposition, physical contact.	LOW	MEDIUM	MEDIUM	 Site secured by fencing and bunding around perimeter (SOP021 – Site Daily Checks); Access from A14 is not a through road – access only to Rothwell Lodge Farm & facility; CCTV cameras in place; A CoSHH Register is maintained for all potentially harmful chemicals stored on site (SOP021 – Site Daily Checks); Storage of hazardous substances limited and secured (SOP021 – Site Daily Checks); All waste processing areas secured when site is not operational (SOP021 – Site Daily Checks); One vehicular access to site. 	LOW	



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INCIDENTS & ACCIDENTS FORM



WHAT HAPPENED, WHAT WAS IT ABOUT? WHAT CAUSED IT? WHAT ACTION DID YOU TAKE TO FIX THE PROBLEM? WERE EXTERNAL AGENCIES INVOLVED? WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON THE ENVIRONMENT AGENCY ON TIME: DATE: E.A INCIDENT NUMBER:	DATE AND TIME OF THE INCIDENT							
WHAT CAUSED IT? WHAT ACTION DID YOU TAKE TO FIX THE PROBLEM? WERE EXTERNAL AGENCIES INVOLVED? WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WAS THERE ANY SIGNIFICANT POLLUTION IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON TIME: DATE: DATE: E.A INCIDENT NUMBER:	WHAT HAPPENED, WHAT WAS IT ABOUT?							
WHAT CAUSED IT? WHAT ACTION DID YOU TAKE TO FIX THE PROBLEM? WERE EXTERNAL AGENCIES INVOLVED? WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WAS THERE ANY SIGNIFICANT POLLUTION IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON TIME: DATE: DATE: E.A INCIDENT NUMBER:								
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WHAT ACTION DID YOU TAKE TO FIX THE PROBLEM? WERE EXTERNAL AGENCIES INVOLVED? WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WAS THERE ANY SIGNIFICANT POLLUTION IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON 03708 506 506 ASAP. HAVE YOU DONE SO? WERE EXTERNAL AGENCIES YES/NO/NOT HAPPEN AGAIN?	WAS ANYONE ELSE AWARE OF THIS – OTH	ER WITNESSES? IF SO WHO?						
WHAT ACTION DID YOU TAKE TO FIX THE PROBLEM? WERE EXTERNAL AGENCIES INVOLVED? WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WAS THERE ANY SIGNIFICANT POLLUTION IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON 03708 506 506 ASAP. HAVE YOU DONE SO? WERE EXTERNAL AGENCIES YES/NO/NOT HAPPEN AGAIN?								
WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WAS THERE ANY SIGNIFICANT POLLUTION IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON TIME: 03708 506 506 ASAP. HAVE YOU DONE SO? YES/NO/NOT APPLICABLE TIME: DATE: E.A INCIDENT NUMBER:	WHAT CAUSED IT?							
WHAT HAVE YOU DONE TO MAKE SURE THAT IT DOES NOT HAPPEN AGAIN? WAS THERE ANY SIGNIFICANT POLLUTION IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON 03708 506 506 ASAP. HAVE YOU DONE SO? WAS THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON 03708 506 506 ASAP. HAVE YOU DONE SO?								
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WAS THERE ANY SIGNIFICANT POLLUTION –. IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON TIME: 03708 506 506 ASAP. HAVE YOU DONE SO? TIME: DATE: E.A INCIDENT NUMBER:		ROBLEM? WERE EXTERNAL AGENCIES						
WAS THERE ANY SIGNIFICANT POLLUTION –. IF SO WHAT? E.g.: oil entering a surface water drain IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON TIME: 03708 506 506 ASAP. HAVE YOU DONE SO? TIME: DATE: E.A INCIDENT NUMBER:								
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IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON TIME: 03708 506 506 ASAP. HAVE YOU DONE SO? PES/NO/NOT APPLICABLE TIME: DATE: E.A INCIDENT NUMBER:								
IF THERE WAS THEN YOU MUST NOTIFY THE ENVIRONMENT AGENCY ON TIME: 03708 506 506 ASAP. HAVE YOU DONE SO? YES/NO/NOT APPLICABLE TIME: DATE: E.A INCIDENT NUMBER:		IF SO WHAT? E.g.: oil entering a surface water						
THE ENVIRONMENT AGENCY ON 03708 506 506 ASAP. HAVE YOU DONE SO? TIME: DATE: E.A INCIDENT NUMBER:	drain							
THE ENVIRONMENT AGENCY ON 03708 506 506 ASAP. HAVE YOU DONE SO? TIME: DATE: E.A INCIDENT NUMBER:								
THE ENVIRONMENT AGENCY ON 03708 506 506 ASAP. HAVE YOU DONE SO? TIME: DATE: E.A INCIDENT NUMBER:	IF THERE WAS THEN YOU MUST NOTIFY	VEO/NO/NOT A DRI IO A DI E						
HAVE YOU DONE SO? E.A INCIDENT NUMBER:								
	03708 506 506 ASAP.	DATE:						
PLEASE PRINT YOUR NAME AND SIGN	HAVE YOU DONE SO?	E.A INCIDENT NUMBER:						
	PLEASE PRINT YOUR NAME AND SIGN							

Fernbrook Bio Ltd Doc. Ref: **EP01/F01** Version: 01 Date: March 2012 Author: WISER



INCIDENT RESPONSE PLAN for Rothwell Lodge AD Facility

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DOCUMENT CONTROL

TITLE:	Incident Response Plan
REFERENCE:	K114.1~09~011
CLIENT:	Fernbrook Bio Ltd
AUTHOR:	WISER Environment Ltd.
STATUS:	FINAL
ISSUE:	6
ISSUE DATE:	May 2018
APPROVED BY:	James Astor, Director

REVISION HISTORY

This plan will be reviewed at least every 4 years or when there are significant changes to; plant and equipment; or to the activities on site.

DATE	REF:	AUTHOR	REVISION SUMMARY
29 th April 2013	K114.1~09~011/V1	WISER	N/A
5 th April 2016	K114.1~09~011/V2	WISER	Document reviewed and updated to include information received from both EA and Fire Service.
October 2016	K114.1~09~011/V3	WISER	Reviewed and updated following personnel changes
July 2017	K114.1~09~011/V4	WISER	Reviewed and updated following significant incident and personnel changes
August 2017	K114.1~09~011/V5	WISER	Minor amendments to emergency contacts
October 2017	K114.1~09~011/V6	WISER	Update site drainage plan

K114.1~09~011/V6 Page ii May 2018

Incident Response Plan

Revisions will be indicated in the document by a vertical line inserted in the right hand margin adjacent the altered text, as indicated here.

DISTRIBUTION

This Plan will be distributed to all staff identified in Section 3 Internal Contacts; a paper copy will be held in the site office; an electronic copy will be held on the company server for distribution to the emergency services and regulatory authorities in the event of an incident.

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APPENDICES

Appendix A Site Emergency Plan (K114.1~20~005)

Appendix B Emergency Procedure for Primary Containment
Failure or Major Spillage

Appendix C Disaster Escalation Procedure

TABLES

TABLE 1 Vulnerable Receptors

FIGURES

FIGURE 1	Site located off the westbound carriage way of the A14, west of
	Kettering.
FIGURE 2	Site located in predominantly agricultural area south of Rothwell.
FIGURE 3	Site is accessed directly from A14 westbound or using underpass
	when entering from eastbound carriageway.
FIGURE 4	View WESTBOUND along A14 showing exit sign to site NB take Farm
	Access Only route.
FIGURE 5	View EASTBOUND along A14 slip road from petrol station – take left
	turning to access underpass to site.
FIGURE 6	View showing restricted height access from EASTBOUND A14
	carriageway.

K114.1~09~011/V6 Page v May 2018

1 INTRODUCTION

This Incident Response Plan has been drafted to reflect best practice previously set out in the Environment Agency's Pollution Prevention Guideline *PPG 21 Incident Response Planning [withdrawn 17th December 2015]*, in order for Fernbrook Bio Ltd to manage their environmental responsibilities to prevent pollution and to comply with the law.

This document provides information required by the site operator, regulators and emergency services when an incident occurs. It identifies key staff who are available 24/7 to respond to any incident; details of the emergency services and regulatory bodies who may be involved in any such incident; as well as providing plans for the site and identify the location of service mains.

Supplementary to this plan, where risk assessment identifies it is required; process specific emergency plans will be developed and appended to this document. These will outline the risk management measures used to reduce the likelihood of an incident and the actions to be taken in the event of an incident occurring.

Any incident is dynamic in nature and will be subject to ongoing health, safety and environmental assessment as it unfolds; this will primarily be provided and directed by the relevant regulatory bodies but Fernbrook will also consult with their specialist advisors in these areas.

This document is support by and must be read in conjunction with:

- The Company's Management System
- The Company's Health and Safety Management System
- The site's Management Plan (K114.1~09~006)
- Environmental Risk Assessment (K114.1~11~001)
- Accident Management Plan (K114.1~11~002)
- Disaster Escalation Procedure
- Emergency Procedure for Primary Containment Failure or Major Spillage
- Hazard Analysis and Critical Control Point (HACCP) Plan (OP01/F01)
- Standard Operating Procedures
- Plant Manuals

1.1 SITE DETAILS

ADDRESS	Rothwell Lodge AD Facility Rothwell Lodge Farm Rothwell Road Kettering Northamptonshire NN14 1SS
POSTCODE	NB The site does not have its own postcode; if using Sat Nav this will direct you to the McDonalds Restaurant on the A14 Eastbound (see Access below).
NATIONAL GRID REFERENCE	Site access: SP 82459 80144
(NGR)	Centre of site: SP 82391 80131
OS MAP REFERENCE	OS 1:25,000 Explorer Map 224
ACCESS	The site can be accessed from both the west and east bound carriageways of the A14.
	WESTBOUND
	WESTBOUND Take the slip road identified as Farm access only (see Figure 4 below)
	Take the slip road identified as Farm access only
	Take the slip road identified as Farm access only (see Figure 4 below)
KEY ACTIVITIES	Take the slip road identified as Farm access only (see Figure 4 below) EASTBOUND Approximately 1500m east of exit 3 (A6 Rothwell) take the exit slip to the services. Access to the site can be made by taking a left turn, just passed the petrol station, but before re-joining the eastbound carriageway; an underpass takes you beneath the A14 and to the entrance of the site. See Figure 5 below. NB Height restriction 4.1m
KEY ACTIVITIES	Take the slip road identified as Farm access only (see Figure 4 below) EASTBOUND Approximately 1500m east of exit 3 (A6 Rothwell) take the exit slip to the services. Access to the site can be made by taking a left turn, just passed the petrol station, but before re-joining the eastbound carriageway; an underpass takes you beneath the A14 and to the entrance of the site. See Figure 5 below. NB Height restriction 4.1m (13'6")
KEY ACTIVITIES	Take the slip road identified as Farm access only (see Figure 4 below) EASTBOUND Approximately 1500m east of exit 3 (A6 Rothwell) take the exit slip to the services. Access to the site can be made by taking a left turn, just passed the petrol station, but before re-joining the eastbound carriageway; an underpass takes you beneath the A14 and to the entrance of the site. See Figure 5 below. NB Height restriction 4.1m (13'6") • Anaerobic Digestion of food & other organic
KEY ACTIVITIES	Take the slip road identified as Farm access only (see Figure 4 below) EASTBOUND Approximately 1500m east of exit 3 (A6 Rothwell) take the exit slip to the services. Access to the site can be made by taking a left turn, just passed the petrol station, but before re-joining the eastbound carriageway; an underpass takes you beneath the A14 and to the entrance of the site. See Figure 5 below. NB Height restriction 4.1m (13'6") • Anaerobic Digestion of food & other organic wastes;

2 SITE LOCATION

FIGURE 1:Site located off the westbound carriage way of the A14, west of Kettering.

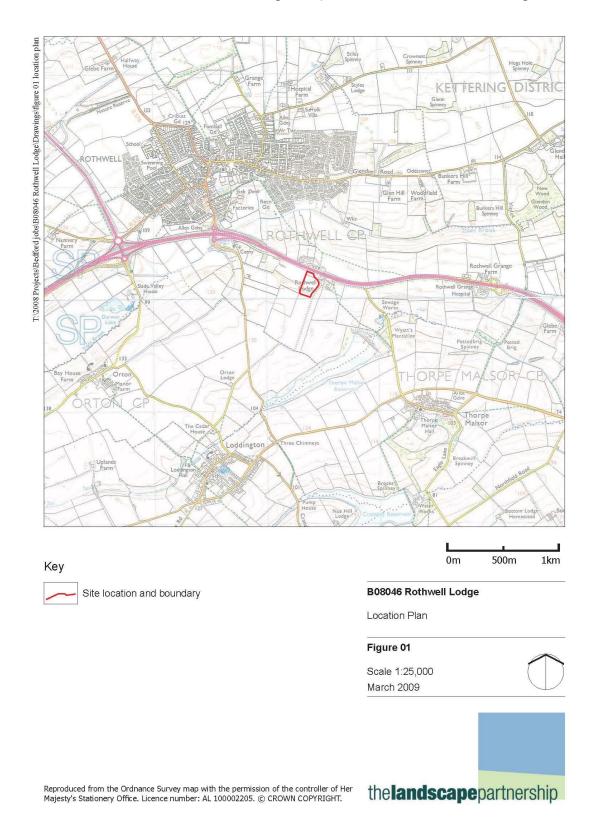


FIGURE 2:

Site located in predominantly agricultural area south of Rothwell.

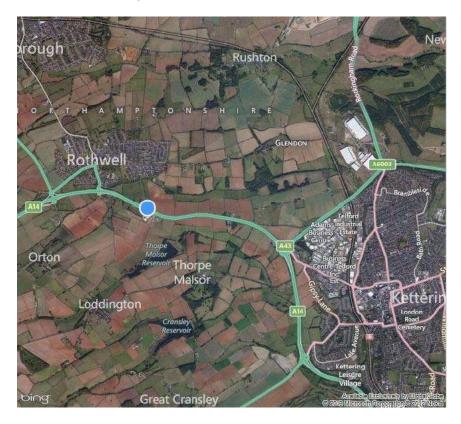


FIGURE 3:

Site is accessed directly from A14 westbound or using underpass when entering from eastbound carriageway.



FIGURE 4: View WESTBOUND along A14 showing exit sign to site NB take Farm Access Only route.



FIGURE 5:View **EASTBOUND** along A14 slip road from petrol station – take left turning to access underpass to site.



FIGURE 6: View showing restricted height access from EASTBOUND A14 carriageway. NB Height restriction 4.1m (13'6")



3 INTERNAL CONTACTS - Disaster Escalation Procedure

SITE CONTACTS	OFFICE HOURS	OUT OF HOURS
Site Manager	01536 710381	
(where not available refer to contacts listed in Disaster Escalation Procedure)	07738 401343	07738 401343

4 EXTERNAL CONTACTS

EMERGENCY SERVICES	NAME	OFFICE HOURS	OUT OF HOURS
EMERGENCY SERVICES (Fire/Police/Ambulance)	-	999	999
LOCAL HOSPITAL	Kettering General Hospital Rothwell Road Kettering Northamptonshire NN168UZ	01536 492000	01536 492000
LOCAL POLICE. (Non-emergency)	Northants Police	03000 111 222	N/A
FIRE SERVICE (Non-emergency)	Northamptonshire Fire and Rescue Service	01604 797000	N/A
AMBULANCE SERVICE (Non-emergency)	East Midlands Ambulance Service	0115 884 5000	N/A

REGULATORS	CONTACT	OFFICE HOURS	OUT OF HOURS
HEALTH & SAFETY EXECUTIVE	For reporting fatal and major injuries only – call the Incident Contact Centre on 0845 300 9923	Switchboard 0151 951 4000 0845 345 0055	0151 922 92351

 $^{^{1}}$ Only call HSE out of hours ;

following a work-related death

following a serious incident where there have been multiple casualties

following an incident which has caused major disruption such as evacuation of people, closure of roads, large numbers
of people going to hospital etc.

REGULATORS	CONTACT	OFFICE HOURS	OUT OF HOURS
	(opening hours Monday to Friday 8.30 am to 5 pm).		
ENVIRONMENT AGENCY (24 Hr Incident Hotline)	-	0800 80 70 60	0800 80 70 60
ENVIRONMENT AGENCY			
(General No. Mon-Fri, 8am – 6pm)	-	03708 506 506	N/A
ENVIRONMENT AGENCY (Local number)	-	01536 385153	0800 80 70 60
ENVIRONMENTAL HEALTH (Kettering Borough Council)	Chris Stopford	01533 410333	01536 416005
LOCAL AUTHORITY Northamptonshire CC - Emergency Planning Department	-	0300 126 1000	0300 126 1000
ANIMAL PLANT & HEALTH AGENCY Bury St Edmunds	Caterina Soares	01904 405 138	01904 405 138
LOCAL AUTHORITY – Northamptonshire CC – Development Control (Planning)	-	01604 367197	N/A
PUBLIC HEALTH ENGLAND (formerly Health Protection Agency)	South Midlands and Hertfordshire PHE Centre	0300 303 8537	N/A

UTILITY/ KEY SERVICES	CONTACT	OFFICE HOURS	OUT OF HOURS
WATER COMPANY	Anglian Water Services Ltd	08457 145 145	08457 145 145
FUEL SUPPLIER	-	VARIOUS	
GAS SUPPLIER	-	NONE	NONE
ELECTRICITY SUPPLIER SmartestEnergy	-	020 7448 0900	N/A
EMERGENCY SPILL CONTRACTOR Whites Recycling Ltd	-	01572 767177	07500 786617

OTHER KEY CONTACTS	CONTACT	OFFICE HOURS	OUT OF HOURS
NEIGHBOURS			
Rothwell Lodge Farm	Mr Ian Pentlow	07817 315 882	07817 315 882
McDonalds	N/A	01536 713 922	01536 713 922
Petrol Station	N/A	01539 625 432	N/A
SPECIALIST ADVISORS			
PROCESS – WELTEC BIOPOWER GmbH	Carsten Hesselfeld	00 49 4441 - 999 78-418 or 00 49 15208 993 548 (mobile)	Weltec 24hr Service 00 49 4441 999 78 999
H&S - Safety Services (UK) Ltd	N/A	0845 4025050	0845 4025050
Environmental – WISER Environment Ltd	Charles Thomas	01480 462232	07974 264387
Waste Brokers - RUR3 Environmental Ltd White's Recycling Ltd	Michelle Websdale Stuart Vernon	01327 304921 07500786615	N/A
LOCAL INTEREST			
Town Council Rothwell	Mrs CE Mackay (Clerk)	Via email	N/A
Parish Council Thorpe Malsor Parish Council	Zandra Powell	Via email	N/A

OTHER KEY CONTACTS	CONTACT	OFFICE HOURS	OUT OF HOURS
Local Liaison Group	Tracy Coombs / Michael Jones	Via Facebook	N/A

5 PRIMARY HAZARD INFORMATION

I.D.	HAZARD	LOCATION (see Site Emergency Plan)	VOLUME
1	Biogas (gas)	Digesters 1 & 2	1,900 m³ Total (950 m³ each)
2	Digestate (Liquid)	Digesters 1 & 2	5,400 m³ Total (2,700 m³ each)
3	Feedstock (Liquid)	Buffer tanks x3	482 m³ Total (2 x 192 m³ and 98 m³)
4	Digestate (Liquid)	Storage tank	4,000 m ³

5.1 ADDITIONAL INFORMATION

The Site Emergency Plan (Ref. Appendix A) shows the location of flammable or potentially explosive products, consisting of:

- Baled cardboard (up to 10)
- Propane cylinders (x5)
- Small chemical store (secure storage) for on-site laboratory
- 2,500 litre internally bunded diesel tank

5.2 BUNDED AREA

Drainage Plan (Ref. Section 10) shows the bunded area within which firewater/foam or lost digestate will be contained (exceeds 110% of the largest tank capacity, some 4,400m³). Groundwater protection is provided for by a geosynthetic clay liner. Any spillages will drain via gravity to a sump with an isolation valve preventing any uncontrolled discharge to the soakaway to the North of site. The containment areas are therefore able to contain any potential spillages from the tank farm and firefighting water or foam.

5.3 CAR PARK AREA

Drainage Plan (Ref. Section 10) shows surface water drainage via an oil interceptor to a soakaway.

5.4 TANKS / PROCESS PIPEWORK

The digestion process is fully automated with level monitoring in all tanks and pressure monitoring on pipework. Critical pipelines have automatic valves fitted which can be activated remotely following an alarm triggering.

5.5 BUILDINGS CONSTRUCTION

The site consists of a single detached building with two floors (second floor comprises a small laboratory and meeting room only), there is also a small mezzanine floor.

General dimensions are 40 m x 30 m with a height of 12 m.

- External Brick, Concrete block and Aluminium Cladded Material
- Columns / Beams Steel
- Roof Steel and Aluminium
- Stairs Concrete
- Ceilings Timber and Building boards

6 VULNERABLE RECEPTORS

The site is located immediately south of the A14, a major east/west trunk road linking the M6/M1 in the west to the A1 in the east.

Beyond the A14 to the north there is a service station with fast food restaurant, and petrol station; beyond this lies the town of Rothwell.

To the south of the site the land is predominantly agricultural.

The Table 1 below identifies sensitive receptors which would potentially be impacted by an incident at the site.

TABLE 1: Vulnerable Receptors

RECEPTOR TYPE	DESCRIPTION	DISTANCE FROM SITE	DIRECTION FROM SITE	
Humans and Property	Site Workers	On site	On site	
rioperty	Site Visitors	On site	On site	
	Inhabitants of residential property			
	Rothwell Lodge Farmhouse	<50 m	East	
	Columbus Crescent, Rothwell	560 m	North west	
	Reservoir Cottage	725 m	South east	
	Orton / Binders Lodge	830 m	South west	
	Users of commercial property			
	Petrol station & McDonalds restaurant	65 m	North	
	Public Right of Way			

RECEPTOR TYPE	DESCRIPTION	DISTANCE FROM SITE	DIRECTION FROM SITE	
	(FP UH3 ² &	130 m	East	
	FP UH1 ³)	100 m	North	
Surface Water	Slade Brook	515 m	North	
	Trib. to Slade Brook	580 m	West	
	Thorpe Malsor Reservoir	525 m	South/south west	
Groundwater	The bedrock has a designation of Secondary A (previously Minor Aquifer) though not within a Source Protection Zone	Beneath Site	Beneath Site	
Protected nature conservation sites	NNR Talby Meadows	2,680 m	North	
(SAC, SPA, SSSI, etc.)	SSSI River Ise & Meadows	4,200 m	Northeast	
Highways	A14	<20 m	North	
Agricultural Land	Agricultural fields and property.	Adjacent to site	South, east & west	
Atmosphere	Atmosphere	Surrounding	Surrounding	

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 $^{^2}$ Terminates at Rothwell Lodge Farm and runs away from site to the south east 3 To the north of the site on the opposite side of the A14 $\,$

7 ENVIRONMENTAL PROTECTION

7.1 SOURCES OF POLLUTION

- Loss of digestate from tanks via soakaway to groundwater or Slade
 Brook
- Products of combustion (e.g. smoke), firewater or foam draining via soakaway to groundwater or Slade Brook

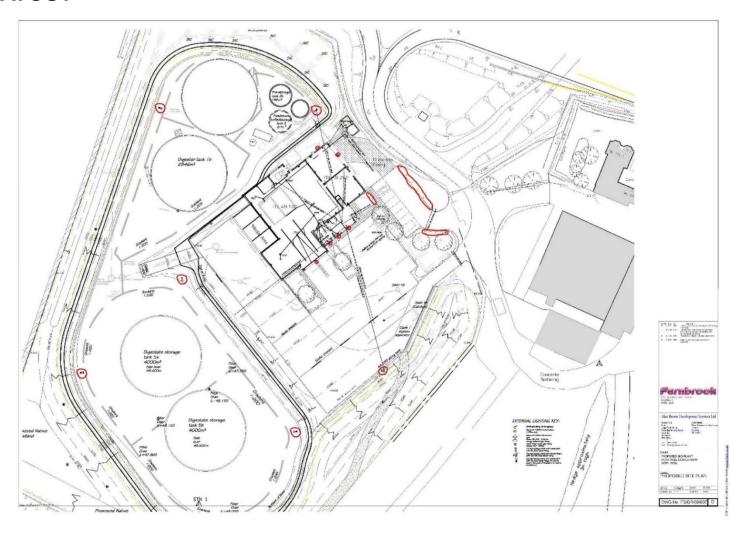
7.2 PATHWAYS FOR RUNOFF

- Thorpe Malsor Reservoir 525 m to the South
- Slade Brook 515 m to the North
- Surface water drains to soakaway via oil interceptor in car park
- Surface water directed to soakaway to the North of site in external bunded area
- Groundwater: Secondary A Low Vulnerability

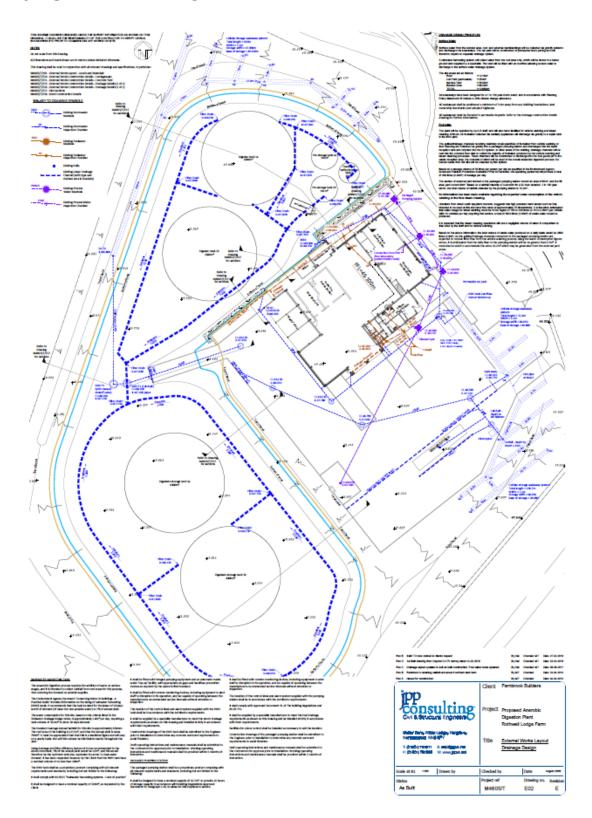
7.3 RECEPTOR SENSITIVITY

- Thorpe Malsor Reservoir **HIGH**
- Slade Brook HIGH
- Groundwater LOW
- Nearby Residents & Users of A14 **HIGH** (Downwind only)

8 SITE LAYOUT

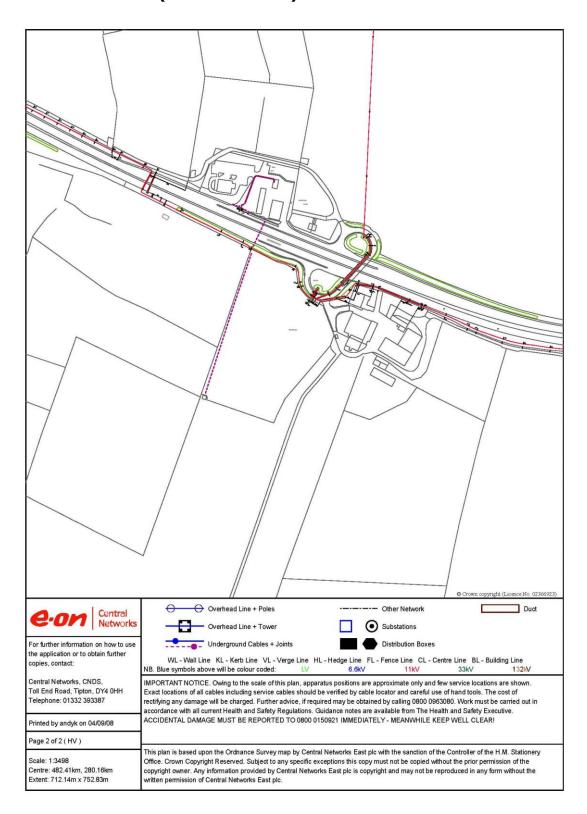


9 SITE DRAINAGE

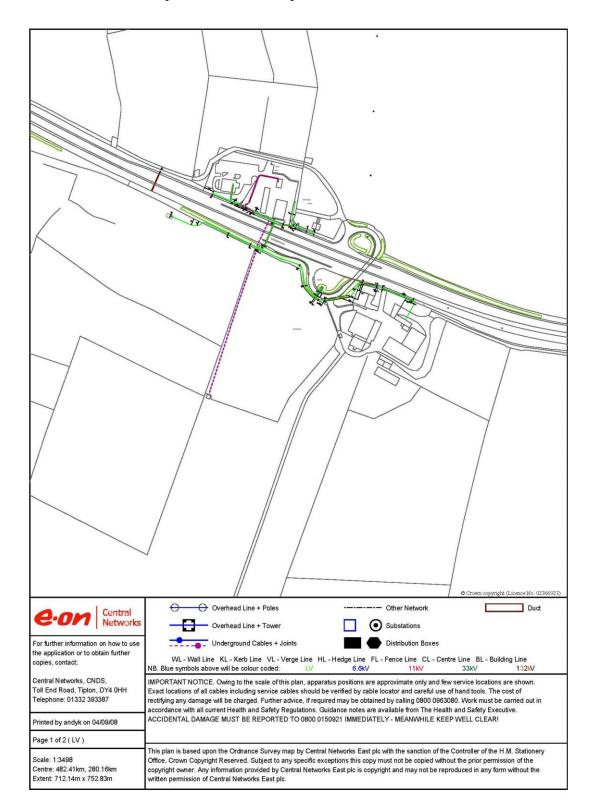


10 SERVICE MAINS

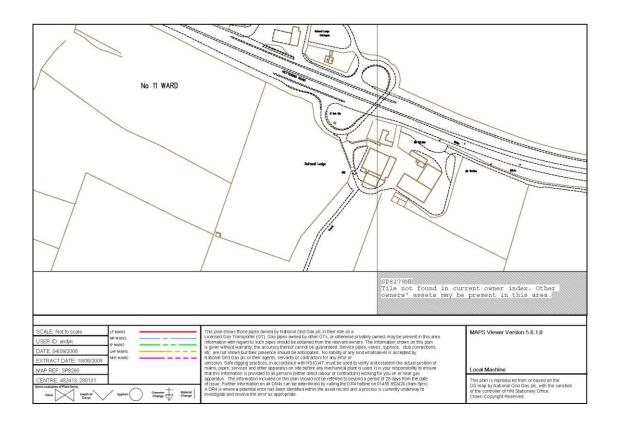
10.1 ELECTRICITY (HIGH VOLTAGE)



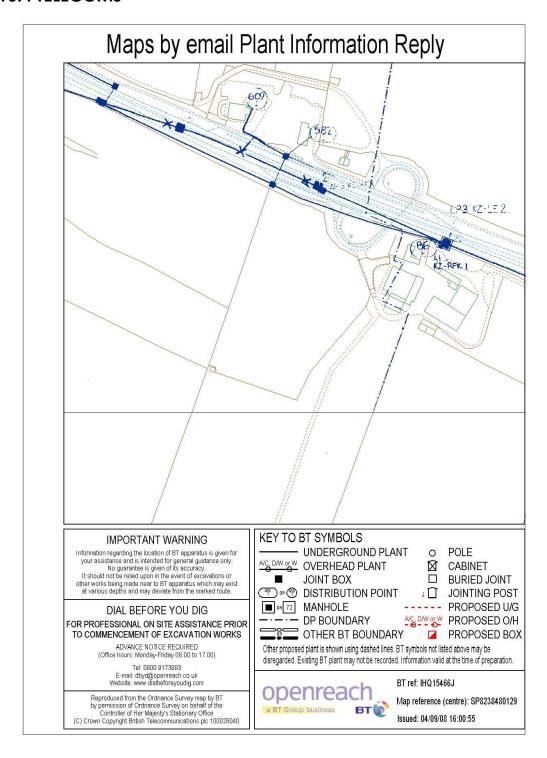
10.2 ELECTRICITY (LOW VOLTAGE)

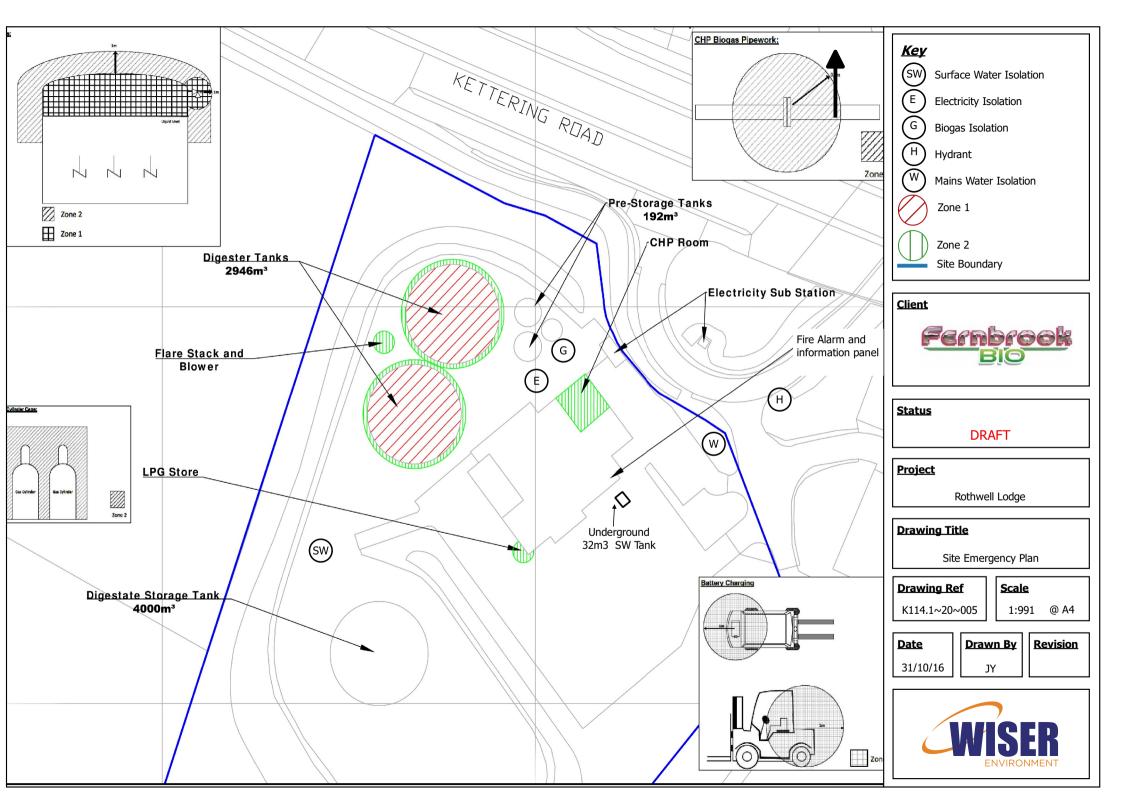


10.3 GAS



10.4 TELECOMS





DIGESTER TANK RUPTURE EMERGENCY RESPONSE



OBJECTIVE TO PROVIDE PROCEDURES IN RESPONSE TO PRIMARY CONTAINMENT FAILURE OR

MAJOR SPILLAGE

SCOPE TANKS

PROCESS

CALL FOR ASSISTANCE FROM COLLEAGUES AND MANAGEMENT .TECHNICALLY COMPETENT MANAGER TO BE DESIGNATED LEAD. ISOLATE DAMAGED TANK BY:

Stopping feeding and mixing

- 2. Checking main valve in drainage system is closed
- 3. Turning off engines
- Isolating all gas lines from the Digester desulphurisation, flare line and gas lines to engines
- 5. Bursting disc will rupture
- 6. If bursting disc fails stay clear of Digester as digestate escapes
- 7. Call EA 24 hour help-line to report incident
- 8. Inform Animal Health and OF&G as part of procedures
- 9. Call for assistance for clean-up of site
- 10. Arranging for 'soup' from buffer tanks to be taken off site by registered hauliers to a permitted site if not diverting waste from site or divert waste from site to agreed partner AD plants
- 11. Arranging for non pasteurised digestate to be leave site to ABP approved permitted facilities prior to digester repair (if required)

Clean up of major spillage (cubic meters)

- Mobilise tankers (approved CAT 3 hauliers) to remove digestate spill off site
- 2. Ensure permitted site available to take non-pasteurised digestate and inform EA and Animal Health of activity and provide permit details
- 3. Hire in misting units to mitigate odour, monitor weather conditions during removal activity
- 4. Remove contaminated gravel into covered area and covered bulkers for disposal to permitted Landfill site by approved hauliers
- 5. Check Integrity of liner as gravel removed and replaced as required

COMPETENCES

- Product and Process Knowledge
- Management System Knowledge

RELATED DOCUMENTS

Management Plan

MONITORING CONTROL	&	Objective/ Control	Target	Responsibility	Monitoring Frequency
		Review QMS	100%	Director	Annually

Fernbrook Bio Ltd Doc. Ref: [REF] Version Number: 01 Date: D/M/Y Author: [NAME]

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DISASTER ESCALATION PROCEDURE

For avoidance of doubt a disaster is a sudden, calamitous event that seriously disrupts the functioning of a community or society and causes human, material, and economic or environmental losses that exceed the community's or society's ability to cope using its own resources.

White's Recycling Ltd / Fernbrook Bio Ltd

Immediately inform others of incident and follow emergency procedures	PERSON TO ESCALATE FOR ADVICE / DECISION
Note:	SITE MANAGER ANAGING DIRECTOR – White's Recycling Ltd Notify - MD/DIRECTORS – Regen Holdings Notify CEO – Regen Holdings Ltd

white's recycling Itd



PROCEDURE FOR MAJOR POLLUTION

Immediately inform others of the incident

- Follow Site emergency procedures if safe to do so
- Contain pollution where possible if safe to do so
- Isolate and protect receptors where safe to do so
- **Phone the Emergency Services if applicable**
- Follow internal escalation & communication

Note:

A Director will take responsibility for the following: Any media approach.

Any approach by Regulatory bodies/local community Legal advice if required.

EMERGENCY CALL RECEIVED BY THE DUTY MANAGER

INTERNAL ESCALATION & COMMUNICATION

The Emergency will need to be escalated for advice/decision:



OPERATIONS MANAGER

The Emergency will need to be escalated for advice/decision:



GENERAL MANAGER - White's Recycling Ltd and/or **MANAGING DIRECTOR – White's Recycling Ltd**



Notify MD/DIRECTORS - Regen Holdings Ltd



NOTIFY CEO – Regen Holdings Ltd

white's recycling Itd



PROCEDURE FOR FATALITY OR MAJOR INJURY INTERNAL ESCALATION & COMMUNICATION

- Raise the alarm
- Phone the Emergency Services
- Locate trained First Aider(s) if available to administer help
- If possible remain with injured person until help arrives

Note:

A Director will take responsibility for the following: Inform next of Kin Any media approach. Any approach by Regulatory bodies/local community Legal advice if required.

EMERGENCY CALL RECEIVED BY THE DUTY MANAGER

The Emergency will need to be escalated for advice/decision:



GENERAL MANAGER

The Emergency will need to be escalated for advice/decision:



MANAGING DIRECTOR - White's Recycling Ltd



Notify CEO - Regen Holdings Ltd



Notify MD/DIRECTORS – Regen Holdings Ltd