Recycling and recovery UK

Sidegate Lane

Battery Recycling Facility

1.4 Accident Prevention & Management Plan

June 2025

recycling and recovery UK
www.suez.co.uk

DOCUMENT DETAILS

Document title	Sidegate Lane Battery Recycling Facility Accident Prevention and Management Plan
Version	1.0
Date	June 2025
Prepared by	Katie Heath – Environment Permit Manager
Reviewed by	Geraldine Guiguet-Doron – Environment Permit Manager Amy Mcaree – EIR Manager Alan Colledge – Technical Director
Approved by	Nigel Ingram – Operations Director
Distribution	SUEZ – Site Copy SUEZ – Environment & Industrial Risk Department Environment Agency

DOCUMENT REVIEW HISTORY

Date	Description	Summary of Changes
June 2025	Version 1.0	Original document to support permit variation to add battery treatment

CONTENTS

1 SITE DETAILS 1
1.1 Site Activities 1
1.2 Emergency Contacts 1
1.3 Accident Investigation 2

TABLES

Table 1 Emergency Contacts

Table 2 Accident Prevention and Management Assessment

APPENDICES

Appendix A Probability and Consequence Assessment Definitions

1 SITE DETAILS

1.1 Site Activities

1.1.1 Sidegate Lane Battery Recycling Facility is located on Sidegate Lane in Wellingborough, Northamptonshire (NGR SP 91464 70336).

1.1.2 Activities undertaken at the site are detailed below. Refer to the Operations and Emissions Management Plan (document reference 1.2) and Environmental Risk Assessment (document reference 1.3) for full details of site activities.

- Waste pre-acceptance and acceptance.
- Unloading of waste, including lithium–ion batteries, lithium-ion battery materials, non lithium–ion batteries and fluorescent tubes.
- Storage of lithium-ion batteries and lithium–ion battery materials
- Storage and transfer of non-lithium batteries and fluorescent tubes.
- Treatment of lithium-ion batteries and materials including, as appropriate, discharging, dismantling, shredding and separation and sorting.
- Loading of batteries, fluorescent tubes and lithium-ion battery treatment outputs for further recovery.

1.1.3 The COSHH index details the substances stored on site and the location in which they are stored. This is located on site within the H&S Folder. Chemicals and oils are stored in the chemical/oil store located in the site building near to the plant. Cleaning equipment is stored internally in the same area of the site building and in the site offices.

1.2 Emergency Contacts

1.2.1 Contact details for stakeholders who may need to be contacted in the event of an emergency are provided in Table 1 below.

Table 1: Emergency Contacts

Name	Organisation	Contact Number
Environment Agency	Regulator	0800 80 70 60
SUEZ 24 hour emergency number Amy McAree (EIR Manager) Alan Colledge (Technical Director)	SUEZ	0800 064 8887 07581 026 276 07970 213692

1.3 Accident Risk Assessment

1.3.1 The risk is determined by the probability of an accident occurring and the likely consequences of any impact. The assessment of risk considers the residual risk that remains after implementation of the preventative measures.

1.3.2 Risk assessment definitions and the risk estimation matrix are presented in Appendix A.

1.3.3 Control measures to mitigate potential accidents within SUEZ's control are listed within Table 2.

1.4 Accident Investigation

1.4.1 IMS – Accident Investigation and Reporting, describes the methods for reporting, recording and investigating accidents and near misses (including the forms required).

1.4.2 All accidents shall be reported and recorded in a timely manner and shall be investigated as soon as practicable, which may include an Incident Review Panel, dependant on the severity of the incident.

1.4.3 Investigation findings shall be recorded and preventative measures, where identified, shall be implemented as soon as practicable.

Table 2: Accident Prevention and Management Assessment

Accident	Avoidance Measures	Impact Minimisation Measures	Likelihood Rating	Consequence Rating	Risk Rating
Spillage of oil, fuel or hydraulic fluid from plant colliding with infrastructure, mechanical failure, leak during refuelling / maintenance or leak from storage containers.	A fuel tank is available on site, but is unlikely to be used as the mobile plant are electric. Siting of fuel storage tank located to reduce possibility of impacts from vehicles. The fuel oil storage facility onsite is fully bunded in compliance with the control of Pollution (Oil Storage) (England) Regulations 2001 and are located on impermeable surface, with vehicle impact protection. A small volume of hydraulic fluid will be stored in the site building to support plant maintenance. All fuel/oil storage on site takes place in accordance with relevant legislation and in suitably bunded containers, as appropriate. Oil/fuel/waste containers will be inspected daily for damage or defects. Plant and equipment is only operated by suitably trained personnel. Prior to use, all plant will be subject to inspecting and any issues will be reported via the defect reporting procedure. Preventative maintenance schedules are implemented for all fixed and mobile plant.	The site is provided with impermeable concrete surfaces to prevent the transmission of potentially contaminated liquids into groundwater beneath the site Any bunding to be kept clear of accumulating liquids to ensure capacity of containment systems is maintained. Spill kits provided at suitable locations around site, with staff trained in their use. These include drain mats to allow spills to be retained on the impermeable surface. Small volumes of oils and hydraulic fuels will be stored in the building only. A spill kit will be available for clean-up of minor spills. The drainage system directs run-off from the northern area of the site to the sealed surface water lagoon. The lagoon is monitored daily to ensure content level, removal of debris and integrity of the surrounding fence. All surface water run-off from the external impermeable surface in the yard area in front of the site building is directed to the interceptor (9000 litres) through gullies and drains. This runoff is collected in a Class 1 Full retention Interceptor and cellular attenuation tank before discharging to	Low	Medium - pollution of local water courses, groundwater and aquifers	Medium

Accident	Avoidance Measures	Impact Minimisation Measures	Likelihood Rating	Consequence Rating	Risk Rating
	The site is subject to ongoing site inspection and corrective action procedures, ensuring any potential emissions are identified quickly. Waste vehicle drivers are required to sign for a copy of the site specific procedures and must comply with SUEZ's operational practices whilst on site.	soakaway. The system is equipped with a penstock valve to allow any contamination to be contained in the event of an incident.			
Vandalism to fuel or waste storage infrastructure	CCTV, site security, fencing and gates are installed to discourage unauthorised access to the site. IMS procedures include a daily requirement to check the condition of the security measures and take appropriate remedial action in the event of any damage.	As above	Very Low	Medium - pollution of local water courses, groundwater and aquifers	Low
Fixed Plant Breakdown	Plant and equipment is only operated by suitably trained personnel. Prior to use, all plant will be subject to inspecting and any issues will be reported via the defect reporting procedure. Preventative maintenance schedules are implemented for all fixed and mobile plant. The site is subject to ongoing site inspection and corrective action procedures, ensuring any potential emissions are identified quickly.	The plant will be shut-down immediately in the event of a breakdown event. A store of critical spare parts (e.g. pollution control spares) will be kept on site to enable quick replacement. In the event of a breakdown, the plant will only be restarted once the issue has been remediated and the operation is safe to re-commence.	Low	Medium	Medium
Fire	Site security measures, including CCTV, site security, fencing and gates, are in place to prevent unauthorised access to the site. A fire watch is carried out at the end of daily operations.	Full details are in Fire Prevention Plan.	Low	Medium	Medium

Accident	Avoidance Measures	Impact Minimisation Measures	Likelihood Rating	Consequence Rating	Risk Rating
	Waste acceptance measures are in place as detailed in the Operations and Emissions Management Plan. Waste storage is managed in line with the Waste Storage Plan within the Operations and Emissions Management Plan and Fire Prevention Plan. Mobile Plant used on site is electric and is parked inside the site building. Vehicles and plant are stored away from waste storage areas when not in use as a precaution against electrical fire. Smoking areas are enforced on site. A regular cleaning regime is implemented on site. The site has a regular maintenance of plant and electrical installation. Hot works carried out under Permit to Work system.	The site benefits from CCTV and a thermal imaging system which is monitored externally during out of hours. Regular checks of fire safety equipment are carried out as per the IMS. Firefighting equipment is located at strategic locations. Shredder fitted with a fire suppression system. Waste storage is kept at volume below the maximum area size outlined in the EA fire prevention plan guidance. ISO containers for Li-ion battery storage will be stored in pairs. A pair of ISO containers will be separated by a 6 m gap and concrete impermeable surfacing to act as a fire break and prevent the spread of fire from one pair of containers to another. (Refer to indicative site layout plan in the Fire Prevention Plan) ISO containers used to store outputs from the process will be separated by a 6m gap and concrete impermeable surfacing to act as a fire break and prevent the spread of fire. (Refer to indicative site layout plan in the Fire Prevention Plan). Other materials stored on site will be separated by a 6m gap or a partition and concrete impermeable surfacing to act as a			

Accident	Avoidance Measures	Impact Minimisation Measures	Likelihood Rating	Consequence Rating	Risk Rating
		fire break and prevent the spread of fire from one area to another.			
Flooding	See Climate Change Risk Assessment and Business Contingency and Continuity Plan.	A Climate Change Risk Assessment is in place for the facility.	Low	Low	Low
Enforced shutdown	See Business Contingency and Continuity Plan.	Business Contingency & Continuity Plan in place - ability to divert and remove waste to other nearby facilities at short notice.	Low	Low	Low

Appendices

Appendix A – Probability and Consequence Assessment Definitions

Accident: An unplanned event which may cause harm or potential harm to an environmental receptor

Probability: Probability of exposure is the likelihood of the receptors being exposed to the hazard

Probability	Definition
High (H)	High – exposure is probable: direct exposure likely with no / few barriers between hazard source and receptor.
Medium (M)	Medium – exposure is fairly probable: feasible exposure possible - barriers to exposure less controllable.
Low (L)	Low – exposure is unlikely: several barriers exist between hazards source and receptors to mitigate against exposure.
Very Low (VL)	Very Low – exposure is very unlikely: effective, multiple barriers in place to mitigate against exposure.

Consequence: The adverse effects or impacts of a hazard being realised upon a receptor:

Consequence	Definition
High (H)	Possible irreparable damage to environmental resources
Medium (M)	Possible damage to environmental resources which are limited within a regional context
Low (L)	Possible effects might be transient damage to environmental resources which are commonplace on a regional basis and alternative resources are readily available
Very Low (VL)	The effects are negligible or might cause very slight temporary deterioration in the current environmental resource quality.

Risk Estimation Matrix

Risk: A combination of the probability, or frequency, of occurrence of a defined hazard and the consequence and magnitude of impact. The general High (H), Medium (M), Low (L) and Very Low (VL) ratings listed in Table 1, are for use as a guide only based on:

Matrix for the Estimation of the Risk				
	Consequence			
Probability of the Risk	High	Medium	Low	Very Low
High	High	High	Medium	Low
Medium	High	Medium	Medium	Low
Low	Medium	Medium	Low	Low
Very Low	Low	Low	Low	Low