



Recycling and recovery UK

Lee Mill Transfer Station

1.4 Accident Prevention & Management Plan

February 2025

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DOCUMENT DETAILS

Document title	Lee Mill Transfer Station Accident Prevention and Management Plan
Version	1.0
Date	February 2025
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Distribution	SUEZ - Site Copy SUEZ - EIR Department Environment Agency

DOCUMENT REVIEW HISTORY

Date	Description	Summary of Changes
February 2025	Version 1.0	Original document produced as part of new permit application

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1 SITE DETAILS

1.1 Site Activities

- 1.1.1 The Lee Mill facility is located at Strashleigh View on Lee Mill Industrial Estate, Ivybridge, Devon, PL21 9UH, at National Grid Reference (NGR) SX 61365 55780.
- 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 acceptance
 - Loading and unloading waste
 - Manual sorting and separation of waste
 - Physical treatment of waste
 - Storage of waste
 - Container exchange
- 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. Gas cylinders are stored in the vehicle workshop (chained upright). Chemicals and oils are stored in the vehicle workshop on bunded pallets. Cleaning products and equipment is stored internally in the cleaning cupboard in the main office. Vehicle cleaning liquids are kept in a metal shed in the yard with the pressure washer on a bunded pallet.
- 1.1.4 Control measures to mitigate potential accidents within SUEZ's control are listed within Table 2.

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	SUEZ	0800 064 8887
Andrew Jones (EIR Manager)		07974 233023
Richard Smith		07550 077361
Harry Mcleman		01395 234500

1.3 Accident Investigation

- 1.3.1 IMS – Accident Investigation and Reporting, describes the methods for reporting, recording and investigating accidents and near misses (including the forms required).
- 1.3.2 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.
- 1.3.3 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.	No Fuel is stored on the site. Lubricant/ oil storage on site takes place in accordance with relevant legislation and in suitably bunded containers. Daily inspection of oil/waste containers. Plant and equipment only operated by suitably trained personnel. Inspection of plant and equipment prior to use and defect reporting procedure. Preventative maintenance schedules for all fixed and mobile plant. Ongoing site inspection and corrective action procedure. 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.	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. External areas and roadways drain to surface water via an interceptor.	Low	Medium - pollution of local water courses, groundwater and aquifers	Medium
Vandalism to oil or waste storage infrastructure	Security fencing and gates are installed to discourage unauthorised access to the site. The site benefits from CCTV which is monitored internally. 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

Accident	Avoidance Measures	Impact Minimisation Measures	Likelihood Rating	Consequence Rating	Risk Rating
Fire	Site security measures are in place to prevent unauthorised access to the site. A fire watch is carried out at the end of daily operations. 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/Fire Prevention Plan. Plant is parked externally. Vehicles and plant are stored away from stockpiles of material when not in use as a precaution against electrical fire. Smoking areas enforced on site. Regular cleaning implemented on site. Regular maintenance of plant and electrical installation. Hot works carried out under permit to work system.	Full details are in Fire Prevention Plan The site benefits from CCTV which is monitored internally so fires can be detected quickly during operational hours. Building fitted with fire alarms and spark detection. Shredder is fitted with spark detection and fire suppression system. Out of hours the building is remotely monitored for fires. Regular checks of fire safety equipment are carried out as per the IMS. Fire fighting equipment is located at strategic locations. Three public fire hydrants are located proximal to the site. Storage of combustible materials are kept at volumes below the maximum stockpile size outlined in the EA fire prevention plan guidance. Waste storage areas are separated by a 6m gap or a partition and concrete impermeable surfacing to act as a fire break and prevent the spread of fire from one stockpile to another.	Low	Medium	Medium
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

Accident	Avoidance Measures	Impact Minimisation Measures	Likelihood Rating	Consequence Rating	Risk Rating
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