

Project details	Environmental Permit Variation Application – EPR XP3493VP Sharpsmart Limited – Clinical Waste Facility Stoke on Trent
Applicant details	Sharpsmart Limited 9 Longport Enterprise Centre Scott Lidgett Road Stoke on Trent ST6 4NQ
Report details	EP Variation Application – Appendix J: Accident Management Plan Document reference: SHSMT_2018.01/07
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1 Introduction

1.1 General

Sharpsmart Ltd (the ‘applicant’) has requested that Reva Environmental Ltd (the ‘agent’) prepares an Environmental Permit (EP) variation application, for its clinical waste facility at 9 Longport Enterprise Centre, Scott Lidgett Road, Stoke on Trent, ST6 4NQ.

The applicant supplies re-usable sharps containers to the healthcare sector and provides a collection service to its customers whereby the used containers are taken to an applicant transfer facility, emptied and cleaned and sent back to the customer. The contents are transferred to an appropriately permitted facility for treatment. In addition to the sharps containers, a proportion of the incoming waste is bagged and in bulk containers. This waste stream is simply stored pending transfer to another treatment or disposal facility.

The facility is currently authorised by EP ref. EPR/XP3493VP which was originally granted in November 2011 and most recently varied (V005) 2018.

The objective of this application is to obtain a varied EP which enables the applicant to carry out a waste treatment activity at the Stoke facility, as a supporting activity to the existing transfer operations.

The proposed treatment plant is an autoclave which will have the capacity to process more than 10 tonnes per day; it is therefore a ‘listed activity’ and the EP will be an Installation EP as a result of its inclusion. The plant also includes a standalone shredder unit pre-treatment, and a standalone compaction unit post-treatment. The listed activity that covers all 3 parts of the treatment plant is as follows:

- Section 5.3 Part A(1)(a)(ii) – Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day, by physico-chemical treatment.

Activities directly associated with the above include:

- Operation of steam-raising boiler (natural gas-fired) to supply the autoclave; and
- Storage of hazardous waste pending treatment.

There is no intention to change the type of waste being received at the facility; the permitted waste list in the current EP (V005) is not required to be amended.

This Accident Management Plan forms part of the Environmental Management System and in the same way as other procedures are, it will be reviewed on a regular basis in accordance with the EP and also updated as required following any incidents, changes to process, or to reflect changes in legislation or best practice. It seeks to set out the potential accidents that may occur as a result of processing waste materials, to identify the mitigation measures in place to prevent accidents, and to set out the action plan in the event of an incident.

Waste materials stored at the facility are limited to those allowed to be received under the EP and are defined in the EP by EWC code and basic description. Waste storage locations are shown on the Site Layout Plan. Site procedures require waste acceptance and tracking processes to be followed. As a result, in the event of an emergency, the applicant can identify (and is able to provide the emergency services with) details of the quantity of each type of waste present on site at the time of the incident.

2 Risk Assessment

The applicant has carried out a qualitative risk assessment for the proposed new plant, a copy of which is provided in Appendix H (ref. SHSMT_2018.01/05). This identifies the potential hazards, their pathways to causing harm, and the likelihood of them happening alongside the consequences if they do. This satisfies part of the EA guidance on accident management. This AMP takes the hazard information from the ERA and aligns it with potential accidents that could result in harm to human health and/or the environment. The assessment of accident scenarios is presented in Table 1.

Table 1: Assessment of Accident Scenarios

Consequence	Accident Scenario	Control Measures
Impact on land, air and/or water environment	Spillage of chemicals	<ul style="list-style-type: none"> ■ Disinfectant (Solid Hero, containing 35%-50% sodium hydroxide (caustic)) is stored in proprietary (small) drums within a dedicated area of the building and in small quantities ■ Disinfectant (used for the shredder), comprising sodium hypochlorite, is stored in proprietary containers within the same dedicated area of the building and in small quantities ■ Training is provided in spill control and clean up; appropriate spill kits present on site ■ The site has a chemical and spillages incident procedure
	Waste storage failure	<ul style="list-style-type: none"> ■ All waste is held within the confines of the building which has impermeable hardstanding throughout ■ All waste containers are UN approved for the contents and are sealed ■ Pollution control and storage inspection programme is in place for all bunds/containers/hardstanding ■ All waste treatment takes place within dedicated areas of the building ■ The Site has a chemical and spillages incident procedure
	Effluent storage failure	<ul style="list-style-type: none"> ■ Direct discharge to drain is via a concrete sump and engineered drainage system (to foul sewer under consent) ■ When not discharged to drain, effluent is stored in IBCs within a dedicated (and bunded) area ■ Qualified forklift truck operators are responsible for loading full IBCs onto vehicles for transfer (to minimise likelihood of damage) ■ Pollution control and storage inspection programme is in place for all bunds/containers/hardstanding ■ All waste treatment takes place within dedicated areas of the building ■ The Site has a chemical and spillages incident procedure
	Flood	<ul style="list-style-type: none"> ■ Waste segregation, processing and transfer activities carried out within an enclosed building ■ Waste handled appropriately, good housekeeping standard maintained ■ Site surfaced with impermeable hardstanding to provide mitigation of pollution potential from flood waters receding off-site. ■ Appropriate drainage in place on the site, can be closed off to contain flood water
	Vandalism	<ul style="list-style-type: none"> ■ Restricted access to site, only for authorised purposes (and in accordance with pre-booking and acceptance procedures) ■ Security CCTV located across the Site

Consequence	Accident Scenario	Control Measures
	Collision of vehicles on site leading to release of waste	<ul style="list-style-type: none"> ■ All vehicles delivering waste will be enclosed ■ Bulk storage of IBCs of treatment effluent is within a bund which provides protection from vehicle movements ■ Drivers of the site vehicle (forklift truck) are suitably qualified ■ Vehicle numbers at any one time, and speed on site are limited ■ Deliveries and transfers of waste are fully supervised ■ Facility situated on impermeable hardstanding ■ Dedicated access route to the facility, and dedicated loading/unloading points in place ■ Deliveries are scheduled
Impact to air from fugitive emissions of smoke/fumes	Accidental Fire	<ul style="list-style-type: none"> ■ There is no combustion/burning of waste on site ■ Whilst the waste is potentially combustible, it is received and moved in UN approved containers ■ All waste is within mobile containers, so waste can easily be moved away from any fire or source of fire quickly so as to prevent the spread of fire ■ Fire detection is installed throughout the building, and in key locations e.g. in close proximity to the autoclave and shredder plants ■ Fire call points, sounders, and extinguishers are positioned in key locations across the building ■ Fire marshals appointed from site team and trained ■ Fire water containment capacity is sufficient ■ Access roads enable fire engine access through main gate to industrial estate ■ Security measures in place to prevent unauthorised access which could lead to arson

Training is provided to the site team; roles and responsibilities are set out in their terms of appointment. Training includes:

- How to identify an incident;
- How to take the appropriate action;
- How to complete an incident report;
- Who to contact for external assistance if required;
- Who to notify if there is a risk to the environment and/or other persons not aware of the situation; and
- Where to find information required and to ensure incidents are dealt with appropriately.

The applicant has an incident reporting system which forms part of the EMS. A copy of the incident investigation report form is provided in Annex AMP1 of this AMP. This is kept alongside any other supporting information relating to the accident for example accident book record, witness statement, third party communications etc.).

3 Emergency Plan

Six emergency scenarios have been identified and are set out in Table 2.

Table 2: Emergency Plan

Accident / Incident / Emergency	Persons Affected	Procedure / Action Required
Spillage of liquid/release of fumes	<ul style="list-style-type: none"> ■ Site staff ■ Visitors ■ Contractors ■ Neighbouring properties, members of public 	<ul style="list-style-type: none"> ■ Staff to raise the alarm ■ If staff injured as a result of spill – see personal injury procedure ■ Evacuate and cordon off the area from staff and other personnel (staff member to identify cause/nature of spill, put on correct PPE, and isolate the spillage if required (using booms, spill granules, absorbent pads etc.)) ■ Prevent further leakage ■ If the spillage occurs outside the building (i.e. during delivery or transfer of effluent in IBCs off site, deploy drain covers to prevent entry to external site drainage system ■ Once fully absorbed, any spent spill materials are to be disposed of appropriately (e.g. off-site as hazardous waste) ■ Advise management of the incident ■ Management to advise the EA of the incident if this is required under the conditions of the Environmental Permit ■ Record the incident in accordance with site incident reporting procedures and follow up (including investigation) if required
Fire/Explosion	<ul style="list-style-type: none"> ■ Site staff ■ Visitors ■ Contractors ■ Neighbouring properties, members of public 	<ul style="list-style-type: none"> ■ If a fire is discovered and the alarm has not yet been activated by the detection system, sound the alarm at the nearest alarm call point (the fire detection may pick up a fire automatically without the need to manually press the call point) ■ On the alarm sounding continuously quickly and safely vacate the building through the nearest fire exit ■ DO NOT stop to collect personal belongings. ■ Fire marshal(s) to evacuate all personnel to the fire assembly point and ascertain if everyone is accounted for ■ Close all windows and doors behind you to help prevent the spread of fire ■ Turn machinery/plant off where possible and safe to do so ■ If necessary, and safe to do so, move waste materials away from the source of the fire (all waste is in movable UN approved containers) ■ Close the site and cease operations if applicable

Accident / Incident / Emergency	Persons Affected	Procedure / Action Required
		<ul style="list-style-type: none"> ■ If appropriate (e.g. where safe to do so and there is not a fixed fire suppression system in place), fire marshal(s) to tackle the fire with firefighting equipment on site ■ Call emergency services if required ■ Refer to the list of sensitive receptors in the Fire Prevention Plan and contact those that might be affected, if necessary (e.g. neighbouring businesses that may need to also evacuate) ■ Evacuate the area to allow access by the emergency services ■ Advise management of the incident ■ Record the incident in accordance with site incident reporting procedures and follow up (including investigation) if required
Personal injury	<ul style="list-style-type: none"> ■ Staff ■ Visitors ■ Contractors 	<ul style="list-style-type: none"> ■ Staff to raise the alarm ■ Summon site first aider to administer first aid if required ■ Call emergency services if required ■ Evacuate and/or cordon off the area to protect the casualty and to allow access to them by the emergency services and/or first aider ■ Staff to remain with the casualty until support arrives ■ Advise management of the incident ■ If staff injured as a result of spill – see spill procedure ■ Record the incident in accordance with site incident reporting procedures and follow up (including investigation) if required
Breach of Permit	<ul style="list-style-type: none"> ■ Site staff ■ Visitors ■ Contractors ■ Neighbouring properties, members of public 	<ul style="list-style-type: none"> ■ Advise management of the breach ■ If the nature of the breach poses a risk to human health or the environment, management should consider whether it is necessary to shut parts or all of the facility down ■ Record the breach and follow up (including investigation) if required (including identifying the root cause of the breach and the actions taken to bring the site back into compliance) ■ Management to advise the EA of the incident if this is required under the conditions of the Environmental Permit
Flood	<ul style="list-style-type: none"> ■ Site staff ■ Visitors ■ Contractors 	<ul style="list-style-type: none"> ■ Staff to raise the alarm ■ Evacuate all personnel to a safe location ■ Close the site and cease operations if applicable ■ Call emergency services if required

Accident / Incident / Emergency	Persons Affected	Procedure / Action Required
	<ul style="list-style-type: none"> ■ Neighbouring properties, members of public 	<ul style="list-style-type: none"> ■ Advise management of the incident ■ Record the incident in accordance with site incident reporting procedures and follow up (including investigation) if required
Damage to property (including vandalism)	<ul style="list-style-type: none"> ■ Site staff 	<ul style="list-style-type: none"> ■ Advise management of the incident ■ Undertake assessment of damage. If it poses a risk to personnel (e.g. integrity/operation of plant is compromised) hazard signs to be erected and personnel alerted ■ Record the incident in accordance with site incident reporting procedures and follow up (including investigation) if required (including identifying witnesses/persons and property involved) ■ Management to advise the EA of the incident as appropriate

4 Emergency Contacts

In the event of an accident at the facility, the applicant will defer to an emergency contacts list in order to identify any relevant party. The list is presented as Table 3. This is reviewed on a regular basis, and following any accident, to ensure that the contact details are up to date and correct. If amended, this AMP is amended in full and reissued.

Table 3: Emergency Contacts

Contact Company/Person	Contact Telephone Number
Emergency Services	999
Central Fire Station	0844 8001999
Local Police	101
NHS Direct	111
Environment Agency (24 hr emergency hotline)	0800 80 70 60
Environment Agency (local office)	03708 506 506
Electricity Supplier	TBC
Gas Supplier	
Local Authority (Stoke on Trent City Council)	01782 234 234
Sewerage Undertaker (Severn Trent Water)	01332 683369 or 0345 750 0500 (out of hours)
Electrician	TBC
Plumber	TBC
Sharpsmart / Daniels (out of hours):	
TBC	TBC
TBC	TBC
TBC	TBC