Hallenbeagle Transfer Station and Material Recycling Facility

1.5 Business Continuity & Contingency Plan

October 2023

Document Details

Document title	Hallenbeagle Transfer Station and Material Recycling Facility Business Continuity & Contingency Plan
Version	1.0
Date	October 2023
Prepared by	Alice Shaw - Environment Permit Manager Geraldine Guiguet-Doron - Environment Permit Manager
Reviewed by	Andrew Jones - Environment & Industrial Risk Manager Christine Roos - Production Operations Manager
Approved by	Craig Mouatt - Processing Contract Manager
Distribution	SUEZ – Site Copy SUEZ – Environment & Industrial Risk Department Environment Agency

Document Review History

Date	Description	Summary of Changes
October 2023	Version 1.0	Original document produced as part of permit application

1. Introduction

1.1 This document details how SUEZ will:

- Minimise the environmental impact of major changes to normal operations. Minor changes are covered as part of the site Operations Management Plan (Document reference 1.2) and Accident Prevention and Management Plan (Document reference 1.4) and as part of SUEZ's standard maintenance and operational procedures; and
- Comply with Contract and Authority requirements (where relevant) in relation to business continuity and contingency planning.

1.2 The plan outlines an assessment of external and internal risks, the critical areas of the service and how they can be protected, how contingencies are arranged and how service can be recovered.

1.3 Details of specific roles and responsibilities are laid out as well as incident management plans, emergency action plans and all other related documents.

1.4 Although this document cannot detail every event and every scenario, broadly it will show SUEZ's site staff the steps to be taken in situations where business continuity is threatened, and contingency action is required.

1.5 This plan will be revised following each implementation of the Business Continuity and Contingency Plan (BCCP) to incorporate learning and experience from planned and unplanned outage events.

1.6 The steps outlined in this document will be shared with relevant parties. This includes internal stakeholders (i.e., commercial teams and communications teams), external stakeholders (i.e., regulators) and third-party customers and clients (i.e., Local Authorities).

2. Critical Activities and Services

Introduction

2.1 This section details the key activities and services that could be affected by any of the scenarios outlined in the subsequent sections, including contractual, operational and commercial responsibilities.

Contractual

2.2 The site operates under a local authority contract and so strict contractual requirements are in place. The site is contracted to accept waste from Cornwall Council. Other waste streams (non-contract) are also accepted on site, including from trade and commercial customers.

Operational

2.3 The site will be permitted as a Refuse Transfer Station (RTS), Clinical Waste Transfer Station (CWTS) and Material Recycling Facility (MRF) with a combined annual waste acceptance limit of 140,000 tonnes. The maximum combined annual tonnage limit will be 100,000 tonnes at the RTS and CWTS and 40,000 tonnes at the MRF.

2.4 The RTS will provide a facility for the storage and ‘bulking up’ of household residual waste (general waste), food waste, bulky waste, street sweepings and fly tipped waste collected by Waste Collection Authorities (WCAs), plus residual waste from SUEZ’s network of Household Waste and Recycling Centres (HWRCs). The RTS will also accept waste from third party trade customers.

2.5 Non-hazardous and inert waste will be treated as part of the RTS. Treatment activities within the RTS may consist of manual and mechanical sorting/ separation, screening, baling, shredding, dewatering, crushing or compaction of non-hazardous waste for disposal or recovery.

2.6 The Clinical Waste Transfer Station will provide a facility for the storage and ‘bulking up’ of offensive healthcare and clinical waste. There will be no physical treatment of waste as part of this activity.

2.7 The MRF will provide a facility for the physical treatment of recyclable materials for onward transport to re-processing facilities. Recyclable materials will derive from kerbside collections, third party trade customers and SUEZ’s network of HWRCs and Transfer Stations. The treatment includes manual and mechanical sorting/separation, screening, baling, shredding, compaction or ‘bulking up’ of waste.

2.8 In addition, there is a covered bale storage area to store waste bales and loose recyclable materials from the MRF.

Commercial

2.9 The site is a key strategic location for SUEZ and for Cornwall Council.

3. Risk Tables

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

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

3.1 External Risks

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management
Train crash	Transport routes, linked facilities	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities), injury and death, impact on amenity control systems	Low	High	Medium	The site is located adjacent to railway lines There are multiple transport routes connecting site to customers and offtakes	In the event of a rail crash impacting primary infrastructure (the site itself), will be diverted to alternative facilities detailed in Section 4. In the event of a rail crash impacting secondary infrastructure (nearby roads), then alternative (road) offtakes will be used. Other SUEZ facilities can be used to alleviate the number of vehicles at site. In the event of the facility's operations being affected by loss of transport routes, then alternative routes and hauliers will be used
Bridge collapse or severe road accident	Transport routes, linked facilities	Physical damage to secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	The site is located close to the A30, so major road accidents will affect transport to and from the site However, any disruption is likely to be for a short period.	In the event of a severe road crash affecting the area, alternative tipping points will be arranged depending on the situation. SUEZ facilities will be considered first, with third party facilities being used if a SUEZ option is not feasible. Commercial waste inputs may decrease in the short term, and so these may be

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management
							diverted to alternative facilities to alleviate traffic in the area
Industrial explosion	Site operations and infrastructure, transport routes	Physical damage to primary and secondary infrastructure (transport routes, third party facilities), impact on amenity control systems, injury and death	Low	Medium	Medium	The facility does not accept explosive wastes (aside from gas cylinders). These are stored in very small volumes.	In the event of an industrial explosion on site, waste will be diverted to alternative SUEZ facilities detailed in Section 4.
Storm or freak weather	Transport routes and site infrastructure	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities), impact on amenity control systems	Low	Medium	Medium	The site is not located immediately adjacent to a watercourse so risk to the site is low However, storms and freak weather can affect transport links and potentially the site infrastructure	Climate change risk assessment in place. In the event of flooding or infrastructure damage which results in the site being non-operational, materials will be diverted to alternative facilities detailed in Section 4. Offtake transport routes will be adapted as necessary.
Seismic activity	Transport routes and site infrastructure	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	There has been no history of seismic activity in the area	The site has been constructed in line with reasonably foreseeable risks.

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management
Protestor action	Transport routes and site infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	The site is not a high public interest facility There has been no history of protestor action	If protestor action focuses on the site or the surrounding area, then waste will be diverted to alternative facilities detailed in Section 4. If protestor action affects secondary infrastructure (transport links), offtake transport routes will be adapted as necessary.
Industrial action	Transport routes and site infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	There has been no history of industrial action	Industrial action could prevent the use of the site and secondary infrastructure (primarily road links). If this is the case, then action will be taken to resolve the dispute but, in the meantime, waste can be diverted to alternative facilities detailed in Section 4.
Disease pandemic	Site operations	Illness and death	Low	High	Medium	A pandemic is an unlikely scenario but has the potential to affect multiple members of staff	Government guidance will be followed; SUEZ will ensure that appropriate controls and PPE is in place. Staff from other locations can be used to provide cover.
Loss of power	Site operations and infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes,	Low	Low	Low	Power supply is critical for site operations, as it allows use of processing equipment.	In the event of full power loss for a prolonged period, waste can be diverted to alternative facilities detailed in Section 4. Small generators will be kept at site to enable basic operations and security to be maintained

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management
		third party facilities)					
Loss of telecommunications	Site operations	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	Telecommunications are important for communication between SUEZ and third parties	If telecommunications are lost, then the site has the ability to function manually in this respect. A manual weighbridge pack is provided, which negates the need for the computer system.
Loss of water	Site operations and infrastructure	Impact on amenity control systems, loss of drinking water	Low	Low	Low	Drinking water is a legal requirement for site staff and fresh water is required for dust suppression systems and refilling of the fire suppression system tank (although this is maintained at capacity)	In the event of a loss of water supply, bottled drinking water and temporary welfare facilities / water supply can be provided to site Alternative measures in relation to dust / fire management can be implemented as necessary.

3.2 Internal Risks

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management
Fire on site	Site operations and infrastructure, personnel	Physical injury and death, physical damage to site infrastructure, loss of key amenity control infrastructure	Medium	High	High	Fire remains a likely risk at waste management facilities An uncontrolled fire can easily destroy site infrastructure, rendering the site non-operational	See management controls as outlined in the site-specific management system and Fire Prevention Plan (Document reference 1.7).
Severe accident or personal injury	Site operations, personnel	Severe physical injury or death causing cessation of site operations	Low	High	Medium	Any serious personal injury or death would need to be investigated by the HSE and Police, meaning site operations would cease	In the event of a serious injury or death, incoming vehicles will immediately be diverted to an alternative facility detailed in Section 4. The EA will be informed, and contingency arrangements will be made depending on the specifics of the situation Contingency staff can be mobilised to the site to clear residual waste if needed
Security threat	Site operations, site infrastructure (including amenity control infrastructure),	A physical or cyber security threat can affect site operations (directly through threats or damage, or indirectly via	Low	Medium	Medium	The site uses computer systems and physical measures to control operations	If cyber security threats affect SUEZ's computer systems then manual measures can be implemented to receive and dispatch wastes If a physical threat occurs (i.e., terrorist threat or incident), then waste will be

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management
	transport routes	disruption to systems)					diverted to alternative facilities detailed in Section 4.
Flood	Site operations, site infrastructure (including amenity control infrastructure), transport routes	Floodwater damage to site infrastructure including roller shutter doors, roadways	Low	Low	Low	Flooding unlikely – the site is in Flood Zone 1. Power units and electrical systems are fitted above likely flood height.	Climate change risk assessment in place. If flooding means that site operations cannot continue then incoming vehicles will immediately be diverted to an alternative facility detailed in Section 4. If flooding is expected to last for over 7 days, then wastes will be removed from site
Spillage	Site operations, site infrastructure (including drainage infrastructure)	Damage to site surface, drainage system	Medium	Low	Medium	Spillage of fuel/oil is a risk.	Spill kits, spillage procedures and suitably trained site staff.
Key plant and equipment failure	Site operations, site infrastructure (including waste handling and amenity control infrastructure)	Failure of mobile plant, amenity control systems and fire suppression system	Low	Medium	Medium	The operation of the site relies on mobile and fixed plant. This equipment is in good condition and maintained regularly.	Regular maintenance put in place on all fixed and mobile plant. SUEZ's mobile plant contract allows for provision of new plant in the event of failure.

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management
Loss of fuels, chemicals or spare parts	Site operations, site infrastructure (including waste handling and amenity control infrastructure)	Loss of fuel for mobile plant, lack of spare parts	Low	Medium	Medium	The site requires diesel for mobile plant operations, and limited supplies of spare parts / tools.	Fuel is procured by SUEZ through multiple contracts and is protected over other industries due to the operation being key. Spare parts and tools are obtained via SUEZ's contract with plant provision and maintenance suppliers.
Loss of IT	Site operations	Loss of IT	Low	Low	Low	I.T. systems are used for weighbridge operations and for supporting site operations.	The weighbridge system can be run manually, with manual operation packs provided in case of a loss of I.T. Deliveries and offtakes can be arranged by phone if needed.

4. Contingency Arrangements

4.1 Each incident is unique, and as a result the corresponding contingency arrangement will need to be unique to that situation. However, there are several contingency arrangements that SUEZ can plan in advance. These are as follows:

- Alternative tipping sites should the facility in question be compromised:

Facility	Address and Permit Reference
Launceston TS	Bangors Road, Pennygillam Industrial Estate, Launceston, Cornwall. PL15 7PH EPR/GP3895LT
Bodmin MRF	Bodmin Business Park, Launceston Road, Bodmin, Cornwall. PL31 2RJ. EPR/HP3396ER
Connon Bridge TS	East Taphouse, Liskeard, Cornwall. PL14 4NP EPR/LP3596HX
St Austell (Tregongeeves) TS	Tregongeeves Lane, St Mewan, St Austell, Cornwall. PL26 7DS EPR/DP3792HA
St Erth (Hayle) TS	Treloweth Lane, St Erth, Hayle, Cornwall. TR27 6JP EPR/SP3196HU
Cornwall Energy Recovery Centre	St Dennis, St Austell, Cornwall PL26 8DY EPR/GP3433GH

- Use of replacement staff to provide cover to the site in the event of injury, disease or death affecting the workforce at the facility. Cover staff will be provided primarily from SUEZ's Cornwall facilities but can also be sourced from the wider South West region if required.
- Use of manual weighbridge tickets in the event of a full loss of power. Training is provided to the site team so that in the event of a loss of power they can use the emergency ticket pack.

5. Recovery of Service

5.1 It is important that if an incident occurs, service is recovered to the required level as quickly as possible. This is important for SUEZ, customers, and any partners (such as Local Authorities). The timescale for full recovery of service will depend on the severity of the incident. If site operations are completely stopped for over 24 hours, then a bespoke service recovery plan will be developed and

communicated to ensure full service is recovered as quickly as possible, and required actions are communicated to all invested parties.

The following stakeholders should be consulted and informed of recovery of service plans:

- Cornwall Council
- SUEZ's commercial team.
- SUEZ's health and safety team.
- SUEZ's environment and industrial risk team.
- Regulators (EA, HSE).
- Customers (both input and offtake).

6. Roles and Responsibilities

6.1 Basic roles and responsibilities for management of incidents at a regional level are as follows:

Incident Role	Normal Role	Responsibilities
Local Incident Controller	Plant Manager, Operations Manager or Site Manager	• Notify relevant parties (including emergency services if needed) • Identify and set up incident control location (generally the weighbridge office) • Liaise with the emergency services if and when they arrive on site • Manage the incident at a local (site) level
Deputy Local Incident Controller	Shift Manager or Site Supervisor	• Deputise for the Incident Controller at a local (site level) • Support the Incident Controller
Regulator Liaison Controller	EIR Manager H&S Manager	• Communicate and liaise with relevant regulators • EIR Manager to communicate with EA (and Fire Service if necessary) • H&S Manager to communicate with HSE (and Fire Service if necessary)
Regional Incident Controller	Contract Manager / Regional Manager (Operations)	• Co-ordinate regional operational response to the incident

		• Communicate with key stakeholders (including Contract partners and Local Authorities if required) • Communicate with key SUEZ stakeholders (communications team, Regional Director) • Arrange for relief staff if required • Arrange for replacement plant if required • Arrange for repairs or substitute equipment
Regional Incident Controller	Contract Manager / Regional Manager (Commercial)	• Co-ordinate regional commercial and material flow response to the incident • Arrange for emergency haulage • Communicate details of the situation and alternative tipping sites to customers

6.2 In the event of a serious incident (defined as follows) then the roles and responsibilities as identified in IMS 3.8.1 will also be adopted:

- An accident resulting in life changing injuries to a SUEZ employee or third party.
- A serious fire or explosion resulting in injury or significant business disruption.
- Any event that has led to or created the potential or actual risk of environmental and reputation harm arising out of SUEZ operations and or sites and which may give rise to an investigation by regulatory authorities.
- Any event resulting or likely to result in enforcement activity from a Regulatory Body such as the Health & Safety Executive or Environment Agency/Scottish Environment Protection Agency/Natural Resources Wales.

Appendix A – Probability and Consequence Assessment Definitions

Hazard: A property or situation that in particular circumstances could lead to harm.

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 accident and the consequence and magnitude of impact. The general High (H), Medium (M), Low (L) and Very Low (VL) ratings listed in the Table below, are for use as a guide only based on:

Table - Risk Estimation Matrix

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