EMR Limited

Accident Management Plan

Report produced for Cupral Group Limited

Provided by Walker Resource Management Ltd (WRM)

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0.1	27/05/2021	First Draft
0.2	28/05/2021	Internal Review
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0.4	02/07/2021	WRM Review
0.5	02/07/2021	Cupral Review
1.0	05/07/2021	First Issue
1.1	08/06/2022	Update to Sections 1.1 and 1.3
1.2	08/05/2024	Update with EMR business name after acquisition

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1.0 EMERGENCY

1.1 Site Location Details

Company:	EMR Middlesbrough Granulation
Access via:	Gould Avenue
Office Phone:	01642 989739
Site mobile phone:	07376 609305
Site Grid reference:	NZ 48006 20273

1.2 Emergency Contacts

Emergency services:	999
Local Police:	101
Environment Agency Hotline:	0800 807 060
Health and Safety Executive:	0345 300 9923
Electricity Supplier (Emergency):	EDF – 03332 005100
Local Authority:	Middlesbrough Council – 01642 245432
Gas Supplier:	EDF – 03332 005100
Sewerage Undertaker:	Northumbrian Water – 0345 717 1100
Fuel Supplier:	Oil NRG Teesside - 01642 686 000

1.3 Out of Hours

Site Manager: Carl Lerpiniere – 07872 852698

2.0 ACCIDENT MANAGEMENT PLAN

Development of this Accident Management Plan has been made in line with the requirements set out in Section 2.8 of S5.06. For accident management, there are three particular components:

- identification of the hazards posed by the installation/activity;
- assessment of the risks (hazard x probability) of accidents and their possible consequences; and,
- implementation of measures to reduce the risks of accidents, and contingency plans for any accidents that do occur.

2.1 Identified hazards

The following hazards have been identified for the proposed facility requiring assessment and management:

- Inadequate waste acceptance procedures;
- Fires arising from storage of fuel and waste;
- Fuel leak from fuel tank or vehicles;
- Overfilling of on-site storage bays;
- Breach of site containment systems;
- Failure of site infrastructure/mains services;
- Failure to contain firewater;
- Site security failures/vandalism/arson;
- Fugitive emissions (Noise, Pests, Odour, Mud, Debris);
- Pest management; and,
- Mud & debris.

2.2 Assessment of the Risks

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
Inadequate waste acceptance procedures.	Rare - pre-acceptance procedures in place.	Acceptance of non-permitted waste.	Unsuitable waste entering waste treatment process.	Damage to human health, local environment and infrastructure.	Low probability of event due to well-established acceptance procedures.
Fires arising from storage of fuels and waste.	Extremely rare – appropriately stored waste, fuel and limited sources of ignition. Site also has Fire Prevention Plan in place.	Toxic and polluting smoke from waste and fuel storage area. Water used to extinguish a fire could be harmful to the surrounding environment if it isn't contained within the site.	Aerial dispersion of smoke to local residents depending on wind direction. Potential risk of a fire spreading to the surrounding environment. Environmental damage from fire water runoff causing land contamination.	Risk to life of site operatives. Closure of the site for a potentially significant period. Contamination of land. Destruction of habitat if the fire was to spread beyond the site. Potential respiratory harm from toxic smoke, which may result in death.	Low probability of event with high potential consequence.
Fuel leak from fuel tank or vehicles.	Rare - fuel is dispensed from a bunded fuel tank located on the impermeable concrete surface south of processing building. Spill kits and drip trays are available at the point of use.	Potentially polluting liquids flow onto impermeable surface area of facility. Potential risk of fire if a naked flame is present. Increase risk of slips or vehicles skidding on	Polluting substances could drain into the site's drainage system, or run-off paved areas onto adjoining land and pollute groundwater, surface water and soils. Potential for fire water runoff and	Potential slip and trip hazards making the area hazardous for site traffic and pedestrians. Potential fire hazard if a naked flame is present, which may have damaging environmental impacts from fire run off water and emissions.	Low probability of event with low potential consequence due to robust control measures.

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
	Vehicles are housed in the bunded processing units when not in use. Pre-use checks are undertaken on all vehicles which would identify any potential fuel leaks.	the spilled fuel if there is a large quantity. Potential handling hazards if PPE and COSHH risk assessment for the substance is not followed.	smoke emission in worst case scenario.	Potential for land contamination if not constrained. Potential harm to operatives cleaning the spill if the appropriate COSHH risk assessment is not consulted.	
Overfilling of on-site storage bays.	Rare - bays are not filled to above their fill level, through proactive management of fill levels.	Release of potentially polluting waste materials over bay walls and off site.	Polluting substances could leave site and make its way onto adjoining land and pollute groundwater, surface water and soils.	Potential for land contamination if not constrained.	Low probability of event. Bays are adequate, maintained and subject to regular inspections. Volumes are monitored.
Breach of site secondary containment.	Rare – storage tanks are bunded. Concrete pad has a fall towards sealed system.	Fuel runoff from tanks.	Surface runoff and infiltration to sensitive groundwater.	Contamination/potential pollution of local freshwater courses and soil ecosystems.	Low probability of event. Storage tanks are appropriately bunded. Facility sited on impermeable concrete surfacing so fuel will be contained preventing surface runoff and infiltration to sensitive groundwater.
Failure of site infrastructure/mains services.	Rare – infrastructure regularly maintained.	Loss of electrical power.	Fugitive emissions to atmosphere. May interfere with waste treatment process.	Failure of site infrastructure could result in risks of leaks, fire, explosions, gas leaks, odour emissions or temporary closure of the site.	Low probability of event with a high potential consequence.

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
				Build-up of waste material on site, exceeding storage limits.	
Failure to contain firewater.	Rare - systems in place to contain firewater.	Release of firewater following event of fire.	Fire water entering surface waters or into the ground.	Pollution of the environment. Potential damage to neighbouring buildings.	Low probability of event due to established fire procedures and possibility to seal drainage system and store firewater in bays or on concrete area.
Site security failures / vandalism/arson.	Extremely rare – fully fenced facility.	Damage to infrastructure and arson.	As per predictions of failure of site infrastructure.	As per consequences of failure of site infrastructure.	Low risk.
Impact of fugitive releases leaving site.	Medium – potential risk of noise, vibration, or dust being noticed beyond the site boundary.	Noise, vibration, and dust acting as a nuisance to local residents. Deposition of dust in surrounding area.	Aerial dispersion of noise, vibration and dust depending on wind strength and direction.	Potential for harm to sensitive receptor from prolonged exposure.	Low risk given the procedures that manage fugitive releases and mitigation measures in place.
Pest management	Rare - pests could be found at the processing facility although the type of waste accepted and treated reduces the chances.	Vermin such as rats carry diseases which may be harmful to animal and human health and an increase in population may be detrimental to the surrounding habitat.	Potential spread of pests to surrounding area.	Creates a nuisance and potential harm to human/animal health and environmental quality.	Low risk- could occur, however consequences are limited and chances of occurring are reduced by good housekeeping and pest control, if required. This would mitigate against the risk.

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
Mud & debris.	Rare - site kept clean & tidy. All access routes are on impermeable surfacing.	Site roadways polluted with mud & debris.	Mud & debris deposited from dirty vehicles onto site roadways.	The consequences of mud on the highway could be harm to pedestrians or road users from an accident, resulting from the deterioration in the road surface.	Low probability of event due to impermeable surfacing and good housekeeping.

2.3 Risk Mitigation Measures

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
Inadequate waste acceptance procedures.	N/A.	All incoming loads will be weighed, and the correct waste acceptance procedure undertaken. Records of received wastes will be made and retained. Documentation in accordance with the Duty of Care Regulations will be completed. Site operatives will be made aware of the permitted waste types.	Site Manager Environment Agency (If leading to pollution event).	A confirmatory check will be undertaken at the offload area. Additional detailed visual check is undertaken at the corresponding waste reception area	Any non-conforming wastes identified following deposit will be removed and placed in a quarantine area pending removal from the site back to the supplier or to a suitable permitted facility. A record will be made of wastes found not be permitted. Waste rejection procedure in place at site.	OP02 - Waste Acceptance Procedure.
Fires arising from storage of fuel and waste.	Process machinery such as shredders and 360 grabber. Fuel storage areas. Staff areas including the	Regular maintenance of all vehicles. No ignition sources are permitted near fuel storage areas. Fuel is stored in a bunded storage tank.	Fire Brigade- In the event of a fire. HSE-In the event of a serious incident. Environment Agency- following a fire event.	Maintenance of vehicles follow strict procedure. Operators trained in accordance with the on-site fire procedure. Site checks ensuring fire extinguishers are positioned in the correct location, fire exits are not blocked and	Raise alarm on site and contact the fire service immediately. Ensure personnel are evacuated away from the danger zone and assemble at the designated fire assembly point , as detailed within the site's fire procedure. Remove the visitor's book from the site office if safe to do so.	C01-Accident Management Plan. Fire Procedure.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
	site office and weighbridge. Waste reception, storage and processing areas.	Flammable substances are stored in minimum quantities required. Fire extinguishers are located across the site and serviced annually. Fire procedure is enforced across site and implemented by site staff. Visitors to the site are required to sign in at the site office.		flammable material is not stored in inappropriate locations. Fire risk assessment carried out for the facility.	Ensure all staff and visitors are accounted for at the fire assembly point co-ordinated by trained fire marshals. Liaise with the Senior Fire Officer, providing the following information: ○ location of the fire; ○ missing employees or visitors; ○ location of dangerous chemicals/substances; and, ○ location of equipment isolating points. Full incident investigation undertaken to determine the root cause and necessary corrective action. Depending of the severity of the fire, site critical equipment may have been damaged and no further reception or processing of waste would be undertaken until agreed with the EA.	
Fuel leak from fuel tank or vehicles.	Diesel fuel storage tank & plant equipment and machinery.	Bunded fuel tank used to reduce the likelihood of leaks or puncturing of the tanks. Fuel tank is located away from the main	Site Manager- After any significant spillage has occurred.	The condition of the tank is frequently inspected as part of the standard site checks. Pre-Use checks are undertaken on machinery prior to use	Spill kits are available at the point of use and will be used to contain any spillages and cover drains. Ensure machinery is switched off.	Accident Management Plan. COSHH- MSD Sheets.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
		processing areas to minimise the risk of being punctured by a vehicle collision. Spill kits are in place at the point of use. Tank is locked when not in use. Hazard warning signs are located the fuel tank. Vehicles are housed on concrete surfacing when not in use. Vehicles are fitted with cut off valves to prevent overfilling which may cause spillages. Vehicles and machinery are pro-actively maintained to ensure they are in a safe operating condition.	EA-In the event of a pollution incident. Fire Service- In the event on a fire.	to detect any mechanical faults which may result in fuel leaks. Toolbox Talks are held with staff to ensure everyone is familiar with the refuelling and spillage procedure. Site Manager periodically observes the refuelling process to ensure safe practices are followed.	Restrict access to area whilst spill is being dealt with. Refer to the COSHH risk assessment for the safe handling on the spilled material. Monitor external areas to ensure no further contamination. Record and investigate incidents following Management System. Review Management System within the context of a management review. Inform the EA of any significant spillages and the fire service if required.	
Overfilling of on-site storage bays.	Off site receptors.	Management system is strictly adhered to to avoid overfilling of bays.	Site Manager-If fill level is high, or signs of damage seen.	Regular checks of fill-levels and tank condition.	Site operatives will alert Site Manager if the bays have been overfilled. Empty bays will be	Accident Management Plan.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
			Environment Agency- Emergency event.		used to store any overfilled waste.	Environmental Management System.
Breach of secondary site containment.	Fuel storage tank.	Regular inspection of tanks to review integrity.	Environment Agency - Emergency event.	Site checks.	Inform Site Manager upon detection of breach. Try to contain liquids, where possible, with bunds (site has a natural fall to drainage system to prevent spread of spillage onto external area).	Management System. Accident Management Plan.
Failure of Site Infrastructure / mains services.	Concrete surfacing Building. Energy-using equipment. Weighbridge. Water supply.	Infrastructure regularly checked with maintenance programmes.	Service Provider – Inform loss of power. Environment Agency – Inform of any impact on the process.	Routine daily inspections of site integrity.	Inform Site Manager upon detection. Arrange for remedial works to be carried out immediately. Inform service provider to identify cause and restore service immediately. Inform the EA of failure and proposed timescale to repair. Depending on the severity of the failure and timescale to repair, reception or processing of material would not be undertaken until agreed with the EA.	Management System. Accident Management Plan. Maintenance Schedules. Site Diary.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
					Alert supply chain to the issue and cease the acceptance of waste until normal service has resumed. Weigh all outgoing waste at the facility it is being taken to.	
Failure to contain firewater.	N/A	Containment for the water via temporary bunding of area where the fire is located to prevent surface water runoff.	Environment Agency. Fire Brigade.	Daily site checks undertaken which will spot the early signs of a fire.	Firewater contained in temporary bunded area. Firewater will be removed by a subcontractor and treated off site.	Fire mitigation measures.
Site security failures/ vandalism/ arson.	All.	Security measures in place to prevent unauthorised access. CCTV inside building and covering yard areas key areas of site. CCTV has sensors that can link to a security company. Machinery is in near constant use due to the 24-hour nature of the site. Palisade Fencing around the perimeter of the site.	Police. Environment Agency (if break-in leads to pollution incident).	Daily lock up at end of each working day.	Assess damage and mitigate any damage / pollution caused (follow management practices). • Inform site management. • Inform Police. • Inform EA if required.	Management System. Accident Management Plan. Site Diary.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
Impact of fugitive releases leaving site.	N/A	Dust suppression available when levels are high. Regularly maintained equipment to ensure correct operation. Waste processing and storage occurs inside a building.	Environment Agency. Local sensitive receptor.	Daily / weekly site checks.	Dust suppression to reduce risk of further release. In extreme cases cease operation of vehicle or equipment until problem identified and fixed.	Accident Management Plan. Site Manager to co-ordinate.
Pest Management.	N/A	It is considered that the nature of the cable waste results in the risk of pest infestation being low.	Environment Agency. Pest Control.	On-going waste inspections for identification of infestation.	On detection of pests, insects or vermin, an appropriate professional pest/vermin control contractor will be employed.	Pest control measures in place.
Mud & Debris	N/A	Site operational areas will be covered with an impermeable surface. The site will be kept clean and tidy in all areas.	Site Manager.	Daily visual checks on all areas of impermeable surfacing and of public road at site entrance.	Should it become apparent that debris and/or mud has been tracked onto the public highway from this activity, then sweeping of the relevant areas, including the public highway, will be undertaken as soon as practicable.	Management System.

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