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Cumbria Waste Recycling Ltd
Seal Sands HWTS Environmental Permit Application

Accident Management Plan

2025-12-17

UK0042157.9205 / Appendix 6

Document distribution

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Prepared for

Cumbria Waste Recycling Ltd

Seal Sands Hazardous Waste Transfer Station, Seal Sands Road, Seal Sands, Middlesborough, TS2 1UB

Submitted to

Environment Agency

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Revisions

Rev	Date	Details
01	2025-12-01	Draft for Review
02	2025-12-17	For Issue

Table of contents

Executive summary **4**

1. Accident Response Plan **5**

1.1 Context 5
1.1.1 Site Location and Receptors 5
1.1.2 Stored Substances 7
1.2 Accident Risk Assessment 10
1.2.1 Methodology 10
1.3 Roles and Responsibilities 28
1.4 Reporting and Communication 28
1.4.1 Calling the Emergency Services 29
1.5 Post Incident Review 29
1.6 Conclusions 29

Table 1-1 Ecological receptors 7
Table 1.2 Site Tank Inventory 8
Table 1.3 Substance Inventory 9
Table 1.4 Probability of Occurrence 10
Table 1.5 Severity of Consequence 11
Table 1.6 Overall Risk 11
Table 1.7 Overall Risk Categories 11
Table 1.8 Table of potential incident/accident scenarios, consequences and control measures 12

Figure 1 - Site Plan 6

Appendix A – Emergency Contacts
Appendix B – Indicative List of Working Instructions
Appendix C – Site Plans

Executive summary

This Accident Management Plan has been prepared as part of the Environmental Permit Application for Seal Sands Hazardous Waste Transfer Station (HWTS). This is required as a Best Available Techniques (BAT) and forms part of the Environmental Management System (EMS) at the site and to assist in the overall environmental performance of the site.

This Accident Management Plan identifies potential hazards posed by the installation and the associated risks and defines measures to address these risks. It also considers the inventory of potentially polluting substances present or likely to be present which could have environmental consequences if they escape as well as mitigation measures in place including both physical infrastructure and management techniques to reduce impacts from storage, handling and use of these substances.

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This Accident Management Plan is subject to regular review as a result of operational changes, incidents and accidents at the site. As a minimum, this Accident Management Plan will be reviewed every four years and the date of the next review is **December 2029**.

1. Accident Response Plan

1.1 Context

This document details the Accident Management Plan for all operations undertaken by Cumbria Waste Recycling Ltd (CWR) at Seal Sands Hazardous Waste Transfer Station (HWTS).

The Accident Management Plan (AMP) sets out the control measures that will be utilised to minimise the likelihood of accidents/failures and to minimise harm to human health, the environment and infrastructure/equipment.

Seal Sands HWTS is a transfer station for both hazardous and non-hazardous solid and liquid wastes with associated waste handling, storage, treatment and removal from site. Waste is removed from the site for further treatment or disposal at offsite locations. Waste treatments include:

- Physico-chemical treatment of liquid waste via gravity separation, adsorption and dissolving/neutralising;
- Blending and mixing of liquid wastes;
- Repackaging of solid wastes; and
- Crushing and baling of solid wastes to make onwards transfer more efficient.

Near Miss / Incident / Accident reporting is covered at the site induction so that all employees, visitors and contractors have access to the electronic system and are able to make reports electronically via QR codes displayed throughout the site.

1.1.1 Site Location and Receptors

The HWTS is located at Seal Sands industrial estate, Teesside, an industrial estate which has historically been used by the chemical industry and waste management industry, situated on the mouth of the River Tees.

The site comprises of two areas, both of which are enclosed by a perimeter fence with access control:

- Area 1 (in the south) consists of gated access for waste deliveries and the site weighbridge. The main Warehouse for the internal storage of waste, a small Warehouse for secure internal storage of waste, external yards for additional waste storage, site Laboratory and site Office are also found in this location.

  The main Warehouse will store a variety of wastes with the exception of flammable wastes while the small Warehouse will be used to safely and securely store smaller volumes of organic peroxides and oxidisers. Bulking and repacking operations will take place in a smaller Workshop on the eastern side of the main Warehouse. The yard area comprises impermeable concrete surfacing which is resistant to the materials stored here and connected to a sealed drainage system. Kerbing around the impermeable surfacing forms a containment area beyond which the land is unmade.

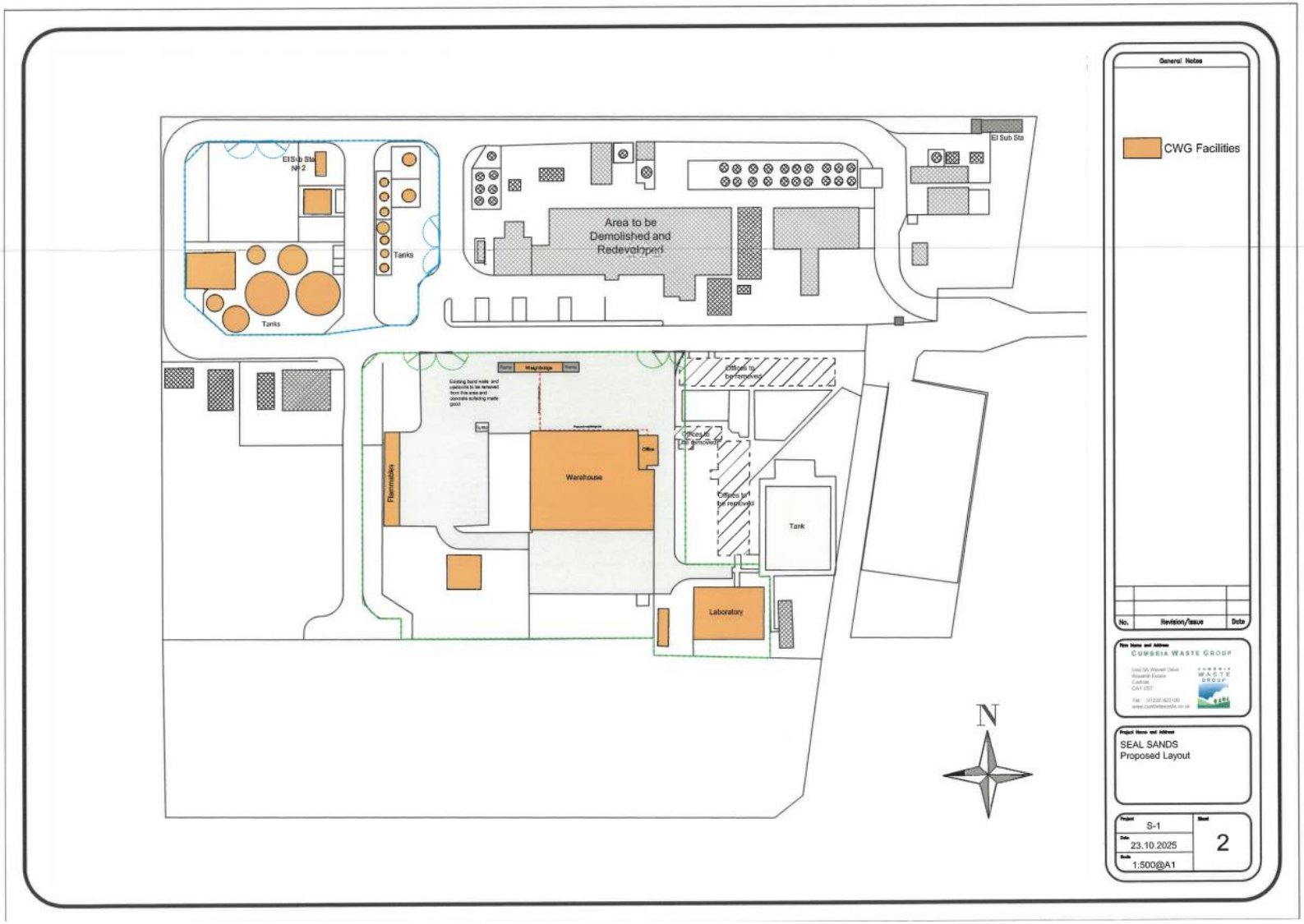
  The yard area within the western area of the site will be used for exclusive storage of flammable waste (including undercover storage). The second yard area to the south of the main Warehouse will store a variety of compatible wastes.

- Area 2 (in the north) consists of a yard area and a number of above ground tanks which are connected by above ground pipework. The yard area comprises impermeable concrete surfacing which is resistant to the materials stored here and connected to a sealed drainage system with a sump, that can be used to pump out waste waters generated here. The yard is an engineered bunded area with kerbing which forms a containment area and beyond the bunded area is unmade ground. A variety of compatible wastes will be stored within the yard area.

  Of the above ground tanks in Area 2, one of the tanks is used as a mixing tank for waste waters generated at the site and one of the tanks is used as an effluent discharge tank, for discharging waste waters to sewer. Both tanks are contained within a bunded concrete area. This discharge is via a private sewer connection.

  A site plan for Seal Sands is shown in Figure 1 below.

Figure 1 - Site Plan



The site is located away from sensitive human receptors, the nearest of which are found approximately 3.8 km to the south west of the site, beyond the River Tees on the A65/Middlesborough Road, in the South Bank area of Middlesborough. Residential receptors can also be found 4.2 km to the north of the site, at Seaton Carew. Human receptors may also be found at nearby recreational facilities including the footpaths, car parks and hides associated with Teesmouth National Nature Reserve, approximately 2 km west of the permit boundary, North Gare Beach and South Gare Marine Club (both approximately 3 km to the north east), either side of the mouth of the River Tees.

There are no Local Nature Reserves (LNR) or Ancient Woodland sites within a 2 km vicinity of the site and no Marine Conservation Zones (MCZs), Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) within a 10 km vicinity of the site. However there is one Sites of Specific Scientific Interest (SSSI), one Ramsar site, one National Nature Reserve (NNR) and one Local Wildlife Site (LWS) within 2 km, which are listed below in Table 1-1.

This site is in Flood Zone 1 which indicates a low probability of flooding from rivers and the sea (less than a 0.1% or 1 in 1,000, chance of flooding from rivers and the sea). The site also has a low likelihood of flooding from surface waters with a small area of the site at risk of surface water flooding (annual exceedance probability of 3.3%).

The site is not located within a Source Protection Zone (SPZ).

The nearest surface water features are small surface water ponds located approximately 30 m to the south and 175 m to the west of the site. The nearest main river is the River Tees which is located approximately 0.525 km to the north east of the permit boundary.

Table 1-1 Ecological receptors

Site Name	Designation	Direction from site	Distance from site (km)
Teesmouth and Cleveland Coast	Ramsar	N	0.430
Teesmouth and Cleveland Coast	SSSI	N	0.430
Teesmouth	NNR	NE	0.640
Zinc Works Bird Field	LWS	N	1.975
N/A	SAC	N/A	N/A
N/A	SPA	N/A	N/A
N/A	MCZ	N/A	N/A
N/A	LNR	N/A	N/A
N/A	Ancient Woodland	N/A	N/A

The Tees Estuary is a habitat European Eels and a migratory route for the following: Atlantic Salmon, European Eel, River Lamprey and Sea Lamprey.

1.1.2 Stored Substances

The primary purpose of Seal Sands HWTS is a transfer station for both hazardous and non-hazardous solid and liquid wastes, with associated waste handling, storage, treatment and removal from site. The site will store a variety of waste types with different hazardous properties depending upon the types of wastes accepted and removed from the site. Waste will be stored within suitable waste containers at all times including wheeled bins, Integrated Bulk Container (IBC), drums and bottles. At any one time there could be up to 1,965 tonnes of waste in waste containers at the site (equivalent to 1,965 m^3 of storage space). In addition, the site will store up to 190 tonnes (or 190 m^3) waste waters within one of two tanks located at the site. The site can store a total of 2,155 tonnes of waste.

The site will accept both non-hazardous waste (which is not classified as hazardous following an assessment using Technical Guidance WM3) and hazardous waste, which could include hazardous waste with any of the following properties:

- Oxidising (HP2)
- Flammable (HP3)
- Irritant (HP4)
- Harmful (HP5)
- Toxic (HP6)
- Carcinogenic (HP7)
- Corrosive (HP8)
- Infectious waste (HP9)
- Toxic for Reproduction (HP10)
- Mutagenic (HP11)
- Release of an acute toxic gas (HP12)
- Sensitising (HP13)
- Ecotoxic (HP14)
- Waste capable of exhibiting a hazardous property listed above not directly displayed by the original waste (HP15).

An up-to-date inventory is maintained for the site by the computerised waste tracking system that is in place and available on the CWR intranet to all site staff. The computerised system links every job from quotation stage, the waste pre acceptance stage, waste acceptance at the site and storage location using a Microsoft Excel database. This produces a site inventory, showing what is in stock at the site and when/where it is sent offsite.

Computer records are backed up automatically to off-site servers.

The site will also store a small number of raw materials which are used within the waste treatment processes and for day-to-day operations of the site.

A site tank inventory and list of raw materials stored at the site are included in Table 1.2 and Table 1.3 below. Of the tanks listed, the Mixing Tank is used to blend some of the waste waters generated at the site. Waste waters are then manually pumped to the Effluent Discharge Tank from where the waste waters are discharged to sewer.

Table 1.2 Site Tank Inventory

Tank Name	Quantity	Storage Volume (m3)	Material
Effluent Discharge Tank (Tank T80/G)	1	130	Lined Carbon Steel
Mixing Tank (Tank T81/G)	1	60	Lined Carbon Steel
Sludge Holding Tank	1	50	Lined Carbon Steel
SBR Tank1 / Stormwater Tank (Tank T88/G)	1	1,000	Carbon Steel
SBR Tank 2 / Firewater Tank (Tank T89/G)	1	1,000	Carbon Steel
Treated Effluent Tank (Tank T85/G)	1	300	Carbon Steel
Off Spec Tank (Tank T86/G)	1	160	Carbon Steel
Filtrate Holding Tank (Tank T87/G)	1	180	Carbon Steel

Table 1.3 Substance Inventory

Raw Material Name	Storage Type	Quantity	Storage Volume	Total Operational Volume
Diesel	Self bunded diesel tank	1 x tank	2,000 litres	2,000 litres
Calcium hydroxide	25 Kg sacks inside of main Warehouse	40 sacks	1 tonne	1 tonne
Sodium hydroxide	Bunded 1,000 litre IBCs in main Warehouse	Max 5 x IBCs	5,000 litres	5,000 litres
Antifoam	200 litre containers stored in a bunded container in main Warehouse	2 drums	400 litres	400 litres
Vermiculite	100 litre bags inside of a building	2 x pallets	4,000 litres	4,000 litres
Sodium carbonate	25 Kg sacks inside of Warehouse in main Warehouse	10 sacks	250 kg	250kg
Flammable liquid wastes	1,000 litre IBC Drums (up to 205 litre) Clip-top drums Smaller bottles and jerry cans	c. 100 tonnes per week	<324 m^3 or 324 tonnes of all flammable wastes at any one point.	324 m^3
Flammable solid wastes	Drums (up to 205 litre) Clip-top drums Wheeled bins	c.50 tonnes per week	<324 m^3 or 324 tonnes of all flammable wastes at any one point.	324 m^3
Acidic wastes	1,000 litre IBC) Drums (up to 205 litre) Clip-top drums Smaller bottles and jerry cans. Labs smalls containers (<5 litres)	c. 100 tonnes per week	<1,616 m^3 or 1,616 tonnes of all wastes at any one point.	1,616 m^3
Hydrogen Peroxide and organic peroxide wastes	Drums (up to 205 litre) Clip-top drums Smaller bottles and jerry cans.	Maximum 5 tonnes	<25 m^3 or 25 tonnes of all wastes at any one point.	25 m^3
Mercury	Drums (up to 205 litre) Clip-top drums Smaller bottles and jerry cans.	Maximum 1 tonne	<1,616 m^3 or 1,616 tonnes of all 'other' wastes at any one point.	1,616 m^3

Raw Material Name	Storage Type	Quantity	Storage Volume	Total Operational Volume
Inorganic bases	1,000 litre IBC Drums (up to 205 litre) Smaller bottles and jerry cans. Labs smalls containers (<5 litres)	c.50 tonnes per week	<1,616 m^3 or 1,616 tonnes of all wastes at any one point.	1,616 m^3
Solvents	1,000 litre IBC Drums (up to 205 litre) Clip-top drum Smaller bottles and jerry cans.	c. 100 tonnes per week	<324 m^3 or 324 tonnes of all flammable wastes at any one point.	324 m^3

1.2 Accident Risk Assessment

The accident risk assessment assesses the likelihood and consequence of a number of accident/failure scenarios at Seal Sands and has been written in accordance with the requirements of the Environment Agency guidance document Develop a management system: environmental permits (Published 2016, updated 2023).

1.2.1 Methodology

The Seal Sands HWTS AMP has been developed using the following approach:

1. Potential incident/accident scenarios are identified and listed in Table 1.8 along with the consequence of the accident and the control measures in place.
2. Potential incident/accidents are given a Probability of Occurrence and a Consequence rating with the current controls against each accident/failure (as per the classifications of Table 1.4 and Table 1.5).
3. The Probability of Occurrence and Consequence ratings are used to generate an overall risk score with Risk Management controls subsequently applied to reduce the risks from each event and generate an Overall Risk rating that remains from each activity.
4. This is presented as either low, medium or high risk.

Table 1.4 Probability of Occurrence

	Category	Definition
1	Very Unlikely	Incident occurs more than every one hundred years
2	Unlikely	Incident occurs every ten to a hundred years
3	Somewhat unlikely	Incident occurs every five to ten years
4	Fairly probably	Incident occurs once per one to five years
5	Probable	Incident occurs at least once per year

Table 1.5 Severity of Consequence

	Category	Definition
1	Negligible	No noticeable consequence to the environment. No loss of amenity.
2	Minor	Minimal localised environmental harm. Minor breach of permitted emission limits. Minor loss of amenity.
3	Significant	Noticeable localised environmental harm. Major breach of permitted emission limits. Minor loss of amenity.
4	Major	Widespread environmental harm. Significant environmental damage. Major loss of amenity.
5	Catastrophic	Site shutdown. Serious environmental damage onsite and offsite.

Table 1.6 Overall Risk

Probability of Occurrence		Severity of Environmental Harm				
		Negligible	Minor	Significant	Major	Catastrophic
		1	2	3	4	5
Very Unlikely	1	1	2	3	4	5
Unlikely	2	2	4	6	8	10
Somewhat unlikely	3	3	6	9	12	15
Fairly probably	4	4	8	12	16	20
Probable	5	5	10	15	20	25

Table 1.7 Overall Risk Categories

Overall Risk	Score
Low	6 or less
Medium	8 – 12
High	15 or more

Table 1.8 Table of potential incident/accident scenarios, consequences and control measures

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
Acceptance of non-conforming wastes	Human receptors in nearby industrial estate. Residential receptors. Surface water and ground water bodies Ecological receptors	Emissions to air and wind dispersion. Inhalation by human and animal receptors causing illness Discharges to soil and percolation through soil and to groundwater	4 – Fairly probable	2 – Minor consequences to site	8	Residential and sensitive receptors are not located within close proximity of the site. CWR follows strict pre-acceptance procedures prior to delivery to the site to ensure no non-conforming wastes are delivered to the site. Before accepting a booking, pre-acceptance checks confirm the site will have suitable space to accept the wastes. Site operates a strict booking-in system to prevent unauthorised and unexpected loads. CWR completes acceptance checks prior to discharge of the waste to confirm waste delivery documents and paperwork are correct. Site has a waste quarantine area for temporary storage of unsuitable wastes and rejection procedures. Site staff are competent and receive suitable training of pre-acceptance procedures. CWR has a non-conformance reporting system to report and review incidents in order to take remedial actions to prevent reoccurrence.	3	2	6 - Low
Minor spillage of liquid waste during	Surface water and ground	Discharges to surface waters.	4 – Fairly probable	2 – Minor localised harm from small spillages	8	The nearest surface water is a small pond approx. 30 m to the south of the site. The nearest main river, the River Tees is located approx. 0.525 km to the North East.	4	1	4 – Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
transfer of packaged wastes	water bodies Harm to aquatic species. Harm to protected species.	Discharges to soil and percolation through soil and to groundwater				There are no direct discharges to surface water bodies. The site is constructed of impermeable surfaces with a contained drainage system which would contain any spillage and prevent its discharge into the environment. Waste movements between different areas of the site take place on the impermeable surfaces using appropriate handling equipment. Liquid waste containers are provided with secondary containment via bunding. Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible opportunity. In event of a spillage, follow site spillage response plan and inform relevant site personnel and relevant authorities. Spill kits are provided around the site which can be used to contain a spillage. Staff are trained in their use. Site staff are competent and receive suitable spill response training and spillages would be reported in CWR's accident/near-miss reporting system to report and review incidents in order to take remedial actions to prevent reoccurrence.			
Major spillage of liquid waste	Surface water and ground	Discharges to surface waters.	3 – Somewhat Unlikely	3 – Significant consequences from these releases of	9	The nearest surface water is a small pond approx. 30 m to the south of the site. The nearest main river, the River Tees is located approx. 0.525 km to the North East.	2	3	6 - Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
during tanker transfer	water bodies Harm to aquatic species. Harm to protected species.	Discharges to soil and percolation through soil and to groundwater		large volumes of liquid waste		There are no direct discharges to surface water bodies. The site is constructed of impermeable surfaces with a contained drainage system which would contain any spillage and prevent its discharge into the environment. Tanker transfers are undertaken by trained staff to prevent misconnections and completed on impermeable surfaces. Systems are in place to prevent 'tanker drive off' incidents. Transfer operations discharging waste into smaller containers are supervised by trained staff. Regular inspections of equipment/machinery/vehicles and maintenance to prevent breakdowns occurring. In event of a spillage, follow site spillage response plan and inform relevant site personnel and relevant authorities. Accident will be reported for accident review and remedial actions implemented to prevent reoccurrence. Spill kits are provided around the site which can be used to contain a spillage. Staff are trained in their use.			
Spillage of hazardous chemical	Surface water and ground	Discharges to surface waters.	4 – Fairly probable	3 – Significant consequences from these releases off	12	The nearest surface water is a small pond approx. 30 m to the south of the site. The nearest main river, the River Tees is located approx. 0.525 km to the North East.	4	2	8 - Medium

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
	water bodies Harm to aquatic species. Harm to protected species.	Discharges to soil and percolation through soil and to groundwater		site into the local environment from hazardous chemicals		There are no direct discharges to surface water bodies. The site is constructed of impermeable surfaces with a contained drainage system which would contain any spillage and prevent its discharge into the environment. Liquid containers are provided with secondary containment via bunding. Hazardous solid waste chemicals are stored within suitable primary packaging and securely within buildings (as required). CWR staff trained in handling and use of hazardous chemicals. Treatment activities (bulking, blending and repackaging) take place inside of a building which is not connected to the site drainage system. Blending of waste waters will also take place inside of a bunded tank. The building and bund would contain any spillage, and ramps prevent liquids from escaping the building. In event of a spillage, follow site spillage response plan and emergency procedures (WI048 Drum Transfer Emergency Procedure). Accident will be reported for accident review and remedial actions implemented to prevent reoccurrence. Spill kits are provided around the site which can be used to contain a spillage. Staff are trained in their use and competent, HNC-level chemists would respond to the spillage.			

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
						Emergency drills are rehearsed at least twice per year. Specific wastes are stored inside of suitable containers which contain potential spillages: • Asbestos waste (double bagged inside of a container) • Aerosol waste (under cover within a cage) • Batteries and accumulators (within leakproof containers) • Fluorescent tubes and lamps (leakproof containers)			
Spillage of hydrocarbons / oil	Surface water and ground water bodies Harm to aquatic species. Harm to protected species.	Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	4 – Fairly probable	3 – Significant consequences from releases of hydro-carbons into the water environment	12	The nearest surface water is a small pond approx. 30 m to the south of the site. The nearest main river, the River Tees is located approx. 0.525 km to the North East. There are no direct discharges to surface water bodies. The site is constructed of impermeable surfaces with a contained drainage system which would contain any spillage and prevent its discharge into the environment. Waste hydrocarbons/oils are stored within suitably bunded containers e.g. IBCs located inside of the main Warehouse (which is bunded) or outside in storage, on impermeable surfaces. Larger volumes of oil/water undergoing gravity separation are stored inside of a bunded tank. Tanks have high-level and ultra-	3	2	6 - Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
						high level ultrasonic alarms to prevent overfilling. Site diesel is stored within suitable, self bunded storage tank. In event of a spillage, follow site spillage response plan and inform relevant site personnel and relevant authorities. Spillage will be recorded on CWR accident/near miss reporting system in order to be investigated and remedial actions implemented. Spill kits are provided around the site which can be used to contain a spillage. Staff are trained in their use. Emergency drills are rehearsed at least twice per year. Tanks and equipment have a maintenance and inspection schedule. Regular inspections of equipment/machinery/vehicles and storage areas will identify leaks from equipment or tanks/vessels at the earliest possible opportunity.			
Failure of site storage and containment infrastructure	Human receptors in nearby industrial estate. Residential receptors. Ecological receptors	Emissions to air and wind dispersion. Inhalation by human and animal receptors	4 – Fairly probable	3 – Significant consequences from these releases into the local environment	12	Residential and sensitive receptors are not located within close proximity of the site. There are no direct discharges to surface water bodies. Site staff perform regular site checks of the site infrastructure and site conditions to identify damage which may result in failure of containment. Tanks and equipment have a maintenance and inspection schedule.	2	3	6 – Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
	Surface water and ground water bodies Harm to aquatic species Harm to protected species.	causing illness Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater				Equipment is used on impermeable surfaces and the site has a sealed drainage system which would contain spillages within the site and provides secondary/tertiary containment. Tanks are located inside of dedicated bunds which would contain spills from this infrastructure. In the event of a spillage, follow on site emergency procedures and spill response kits are available around the site for site staff to use.			
Accidental mixing of incompatible waste chemicals during transfer and blending operations	Human receptors in nearby industrial estate. Residential receptors. Ecological receptors Surface water and ground water bodies Harm to aquatic species.	Emissions to air and wind dispersion. Inhalation by human and animal receptors causing illness Discharges to surface waters. Discharges to soil and percolation through soil	4 – Fairly probable	3 – Significant consequences from releases of hazardous wastes into the local environment	12	Residential and sensitive receptors are not located within close proximity of the site. There are no direct discharges to surface water bodies. All wastes will be subject to extensive pre-acceptance and acceptance checks, with records made about each consignment accepted at the site. Incompatible materials will be stored separately, in accordance with safe segregation guidance. All wastes are sampled and tested on arrival at the site. CWR staff transferring and handling chemicals will be suitably qualified to HNC-level and assessed as competent. Staff will follow Work Instructions (standard procedures) for undertaking such blending treatment activities.	3	2	6 - Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
	Harm to protected species.	and to groundwater				Site infrastructure is designed for storage and handling of waste chemicals and constructed to be resistant to the materials being handled. Any issues such as leaks, overflows, or accidental spills will be reported to relevant site management and addressed appropriately. In the event of an accident, staff will adhere to site emergency procedures. All accidents will be reported within CWR's reporting system and reviewed. Where remedial actions are required, this will be undertaken and staff will be re-trained.			
Minor fire causing the release of polluting substances to air, water or land	Human receptors in nearby industrial estate. Site Operators. Residential receptors. Ecological receptors Surface water and ground water bodies	Emissions to air and wind dispersion. Inhalation by human and animal receptors causing illness Discharges to surface waters. Discharges to soil and percolation through soil	3 – Somewhat Unlikely	3 – Significant consequences from these releases into the local environment	9	Fire alarm systems are in place at the site. The system will be maintained and tested according to Fire and Rescue service recommendations. Emergency response equipment is available at various points around the site and staff are instructed on how to use these. An emergency procedure incorporating actions to be taken in the event of a fire is in place. This will be reviewed and updated as necessary following the changes. All staff are informed of the emergency procedure with regards to fire and the emergency plan is subject to periodic drills. Nominated Fire Marshals are also in place at the site.	2	3	6 - Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
	Harm to aquatic species. Harm to protected species.	and to groundwater				Preventative maintenance on all electrical systems is conducted annually by an approved contractor. Smoking is not permitted at the site (staff/visitors are directed to a designated area outside of the site boundary). Good housekeeping to prevent the accumulation of combustible litter within the site. The site has a Fire Prevention Plan (FPP) in place which will be shared with Cleveland Fire and Rescue Service. In the event of a fire, waste containers and plant can be moved to safer locations. Burnt out wastes will be quarantined, placed into suitable containers (when sufficiently cool) and disposed of appropriately.			
Major fire causing the release of polluting substances to air, water or land	Human receptors in nearby industrial estate. Site Operators. Residential receptors. Ecological receptors Surface water and ground	Emissions to air and wind dispersion. Inhalation by human and animal receptors causing illness Discharges to surface waters.	3 – Somewhat Unlikely	4 – Major consequences from a large-scale fire impacting the site	12	The risk from major fire is identified in the site aspects and impacts register and mandatory compliance obligations will be met on site. Additional fire prevention measures are described in the site Fire Prevention Plan. Fire alarm systems are in place at the site including emergency fire alarm call points. The system will be maintained and tested according to manufacturer recommendations. Emergency response equipment is available at various points around the site and staff are instructed on how to use these. Waste quantities managed on site via an electronic tracking system which enables the	3	3	9 - Medium

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
	water bodies Harm to aquatic species. Harm to protected species.	Discharges to soil and percolation through soil and to groundwater				site to know what quantity of wastes are being stored and where they are. Quantities of higher-risk substances e.g. flammable wastes will be stored separately in the Flammable Yard Storage, away from sources of combustion. An emergency procedure incorporating actions to be taken in the event of a fire is in place. This will be reviewed and updated as necessary following the changes. All staff are informed of the emergency procedure with regards to fire and the emergency plan is subject to periodic drills. Nominated Fire Marshal are also in place at the site. Preventative maintenance on all electrical systems is conducted annually by an approved contractor. 'Hot Works' are prohibited at the site without prior agreement of the Transfer Station Manager. A permit to work is required and personnel are monitored by the Transfer Station Manager/their deputy. Smoking is not permitted at the site (staff/visitors are directed to a designated area outside of the site boundary). Good housekeeping to prevent the accumulation of litter within the site.			

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
						The site has a FPP in place which will be shared with Cleveland Fire and Rescue Service.			
Failure to contain firefighting water/foam within the site	Surface water and ground water bodies Harm to aquatic species. Harm to protected species.	Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	3 – Somewhat Unlikely	3 – Significant consequences from these releases off site into the local environment	9	Fire prevention measures as detailed above reduce the probability of a fire incident taking place that requires active fire-fighting and the generation of fire-fighting water/foams. Fire water will be contained on site which has impermeable surfaces and a contained drainage system; there is only one discharge from the site (to sewer) which is normally closed as discharge to sewer is a manual pumping operation. Firewater can be directed to drainage and held in the storage tanks. Following a fire event, this can then be tested prior to either treatment on site or tankering off-site for treatment.	2	3	6 - Low
Physical hazard of on-site machinery	Site operators Ecological receptors Surface water and ground water bodies.	Machinery use Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	5 – Probably	2 – Minor harm from spillages resulting from use of equipment	10	Site staff are suitably trained in the handling of on-site machinery/equipment. Regular inspections of equipment/machinery/vehicles will identify any defects at the earliest possible opportunity. Equipment is used and stored on impermeable surfaces and the site has a sealed drainage system which would contain spillages within the site and forms a bund. Tanks are located inside of dedicated bunds. Emergency equipment will be available for use to respond to spillages.	3	2	6 – Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
						Procedures are in place in case of an emergency. Accidents and near misses would be reported on CWR's electronic system in order to be reviewed and remedial actions undertaken.			
Vehicle collision/ accident	On site staff. Ecological receptors Surface water and ground water bodies.	Driving vehicles on site Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	4 – Fairly probable	2 – Minor harm from spillages resulting from a vehicle collision.	8	Use of vehicles by staff is restricted to suitably trained individuals who are familiar with its operation and will be able to identify abnormalities within vehicles. Regular inspections of equipment/machinery/vehicles will identify any defects at the earliest possible opportunity. Pedestrian/vehicle segregation enforced by use of dedicated crossing points and walkways. Site has a one-way system and 5 mph speed limit. Storage containers are protected by physical means. Waste containers provide a level of containment in the event of a collision. Emergency equipment will be available for use to respond to collisions resulting in spillages. Procedures are in place in case of an emergency. Accidents and near misses would be reported on CWR's electronic system in order to be reviewed and remedial actions undertaken.	2	2	4 - Low
Deterioration of plant /	Human receptors	Emissions to air and	5 – Probably	2 – Minor harm from spillages	10	A written procedure, inspection regime and Planned Preventative Maintenance	3	2	6 – Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
equipment due to lack of maintenance	in nearby industrial estate. On site staff. Residential receptors. Ecological receptors Surface water and ground water bodies Harm to aquatic species	wind dispersion. Inhalation by human and animal receptors causing illness Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater		resulting from use of equipment		Programme for all plant and equipment will be developed and implemented. Maintenance is carried out in accordance with manufacturers' recommendations by CWR maintenance team and external approved contractors. Plant/equipment is only operated by staff who are suitably trained in the use of on-site plant/equipment. Any operational or maintenance issues will be reported to relevant Management teams and will be addressed appropriately (i.e. repair work undertaken, replacement plant / equipment fitted where necessary). Failures of equipment will be monitored under the preventative maintenance programme to identify trends and to ensure failures are captured before they happen where practicable.			
Vandalism or arson causing the release of polluting materials	Human receptors. Ecological receptors Surface water bodies and ground water	Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	4 – Fairly probable	3- Significant harm if a hazardous material is spilt and leaves the site.	12	The site has appropriate security measures which includes storing waste securely within the site. The site is completely enclosed with fences, has security lighting, intruder alarms and CCTV, access is via perimeter entrance gates and visitors must report to the weighbridge. Site is locked outside of normal operating hours. The site is monitored out-of-hours by security patrols working within the wider industrial estate.	2	3	6 – Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
						Hazardous and dangerous wastes may also be locked inside of dedicated storage areas within buildings. The site has a sealed drainage system and can contain liquid releases in the short-term to prevent off-site discharges (which is a manual batch process). Emergency response procedures from trained staff. Site staff perform regular site checks of the perimeter fence and wider site conditions to identify damage which may allow unauthorised access.			
Flooding from rivers and the sea	Ecological receptors Surface water bodies and ground water. Harm to aquatic species	Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	1 – Very unlikely	5 – Catastrophic if flooding causes site shutdown	5	The site is not located within a flood zone with a high risk of flooding from rivers and the sea. Flood Zone 1 indicates a 1 in 1000 annual probability of flooding. Wastes in packaging or containers can be moved or removed from the site if required which reduces the consequences from a flood. An emergency procedure incorporating actions to be taken in the event of a flood is in place at the site. This will be reviewed and updated as necessary following the changes. There is no direct discharge to surface water features.	1	3	3 - Low

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
Flooding from surface waters due to blocked drains / excessive rainfall	Ecological receptors Surface water bodies and ground water. Harm to aquatic species	Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	2 – Unlikely	3- Significant harm if a hazardous material is spilt and leaves the site.	6	The site has a sealed drainage system and can contain rainfall in the short-term to prevent off-site discharges. Only a very small area of the site is at risk from surface water flooding, limited to land located next to the access road. Wastes in packaging or containers can be moved or removed from the site if required which reduces the consequences from a flood. An emergency procedure incorporating actions to be taken in the event of a flood is already in place at the site. This will be reviewed and updated as necessary following the changes.	1	3	3 - Low
Extreme weather conditions leading to abnormal conditions	Human receptors. Ecological receptors Surface water bodies and ground water	Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	4 - Fairly Probable	3 – Significant harm if a hazardous material is spilt and leaves the site.	12	Emergency procedures are in place as part of EMS. In the event of abnormal weather conditions, operations may be temporarily paused or diverted to other CWR facilities. On-site staff trained to deal with any abnormal weather events by following appropriate shut down measures to reduce severity of consequences. The site has a Fugitive Emissions Management Plan which will be followed to reduce fugitive emissions caused by extreme wind.	4	2	8 – Medium

Hazard **What has the potential to cause harm?**	Receptor **What is at risk? What do I wish to protect?**	Pathway **How can the hazard get to the receptor?**	Probability of Occurrence **How likely is this contact?**	Consequence **What is the harm that can be caused?**	Risk	Risk Management **What measures will you take to reduce the risk? If it occurs who is responsible for what?**	Residual Probability	Residual Consequence	What is the Overall Risk? **What is the risk that still remains?**
Loss of mains power leading to equipment failure	Human receptors. Ecological receptors Surface water bodies and ground water	Discharges to surface waters. Discharges to soil and percolation through soil and to groundwater	3 – Somewhat Unlikely	2 – Minor consequence if loss of power results in a spillage	6	In the event of a loss of external power to the site, site operations would be paused in a safe and controlled manner. Vehicles and equipment with external sources of power (e.g. batteries or engines) would safely complete handling procedures and place wastes within a safe and suitable area of the site.	3	1	3 – Low
Pest and vermin onsite	Human receptors. Ecological receptors	Transport through the air and over land.	4 - Fairly Probable	2 – Minor consequences in the local environment from pests/vermin	8	Biodegradable and putrescible wastes storage and throughput will be managed to reduce pest/vermin impacts. The site will operate on a first in, first out (FIFO) basis to manage volumes and throughputs. Infested wastes will be rejected from the site. The site will be carefully managed, including good housekeeping procedures, and regular checks will be made within and around the site for any litter/debris to prevent the attraction of pests. Operatives are trained in Emissions Management Procedures.	2	2	4 - Low

1.3 Roles and Responsibilities

The Transfer Station Manager for Seal Sands HTWS has overall responsibility for reviewing the processes on the site to minimise the risk of accidents and reduce the impact of any such accidents that occur. The Transfer Station Manager is responsible for implementing emergency procedures as the designated 'Incident Controller' in the event of an incident and co-ordinating the emergency response (with support from CWR resources and emergency services as required). In the event of the Transfer Station Manager not being onsite, their designated deputy will act as emergency co-ordinator and Incident Controller.

The Supervisor Operator is responsible for supervision of other staff completing the day-to-day tasks of the Transfer Station and be aware of what activities are being undertaken

In an emergency, the Transfer Station Manager is responsible for assessing the scenario and determining what action should be taken, which may include evacuation of the HWTS and for calling the emergency services.

All Site Staff operating at the site, under supervision from the Supervisor Operator, are responsible for adhering to CWR Working Instructions (WI) and working safely at all times. Records of training and competence are made on individual training records, which are stored electronically.

1.4 Reporting and Communication

CWR records incident/accident occurrences that occur at the installation on the internal company reporting Near Miss / Incident / Accident reporting and tracking system. This system is accessible to all employees, visitors and contractors working onsite who can report a Near Miss / Incident / Accident electronically using QR codes which are displayed around the site.

In the event of an incident which has caused, or may cause significant pollution, breach a permit limit or has any significant adverse environmental effects, CWR will notify the Environment Agency as soon as is reasonably possible and in accordance with any time limits specified in the site Environmental Permit. The designated member of staff making the notification should use Working Instruction WI145, "*Environmental permit notification of abnormal emissions and significant adverse environmental effects*".

Details of the information that should be reported to the Environment Agency are found in the most recent copy of the site's Environmental Permit (once this has been issued from the Environment Agency, following application) but will include:

- Permit Number
- Name of Operator
- Location of facility
- Time and date of the detection
- Description of the type of event – malfunction, breakdown, release of substance, breach of a limit
- Description of the location of the event
- Substances released or potentially released
- Estimate of the quantity of substances released
- Measures taken to stop an emission.

For full details of the Environment Agency reporting requirements, the Environmental Permit can be found on the Site Noticeboard, Transfer Station Manager's Office, within the Welfare Cabin and on the CWR intranet. Details of the Environmental Permit will also be displayed on a noticeboard at the site entrance along with contact details for the site and the Environment Agency.

In the event of a major or catastrophic environmental effect, or if the effect is likely to be ongoing then the CWR Director and the CWR Environment Manager should be informed immediately. A list of key contacts with regards to Environmental Accidents/Incidents are contained in Appendix A of this AMP.

CWR operates a continuous training system where employees are trained on the relevant WI, Company Procedures, Toolbox Talks and Fire Procedures in order to avoid an incident/accident from happening and to reduce or minimise the impact from an accident should it happen. Depending on the type of incident, the WI will include any necessary plans identifying locations of any emergency kits or equipment for fire, spill kits & drain caps required to deal with the situation.

An indicative list of relevant WI is provided in Appendix B and the latest version of each WI is available on the CWR's Health and Safety system which all staff have access to and printed copies will be available within the Transfer Station Manager's office. Plans of the site showing the locations of suitable accident response equipment are included in Appendix C and available on the Site Noticeboard within the main Warehouse and on the CWR intranet.

1.4.1 Calling the Emergency Services

If the Transfer Station Manager or Deputy has determined that the Emergency Services should be called, the following steps should be taken

1. Dial 999 (9) or ask the weighbridge to call 999 – where safe and practicable the Incident Controller should make the phone call as they will be best able to answer any questions the Emergency Services may have.
2. Contact all employees and inform them of incident and that Emergency Services are on their way
3. Request that staff do not allow any vehicles down to Transfer Station
4. Send a member of staff to the Transfer Station Entrance to guide in the Emergency Services
5. Once the Emergency Services arrive, the transfer station manager or deputy will be responsible for liaising with, and supporting the emergency services

1.5 Post Incident Review

All incidents are promptly reviewed by site management and every site completes a monthly incident/accident review to review and follow up on post incident actions.

Following an incident at Seal Sands where potentially significant environmental effects occur an investigation will take place (commensurate to the impact) to determine the root cause of the incident and how to prevent the incident reoccurring. Findings, trends are discussed at board level and are also used to help establish objectives for improvement.

If required, the findings of the investigation will be shared with relevant employees to enable the incorporation of good practice into future works at Seal Sands or within the wider company. This could include risk assessment reviews, procedure changes and new toolbox talks.

In the event of a fire, any firefighting water that has been contained within the site will be tested and tankered off site for disposal at a suitable facility which can accept the waste. Burnt materials will be removed from the fire location (when safe to move) and stored within a designated quarantine area prior to their removal from the site.

If, as a result of the Post Incident Review, this AMP is subject to revision, it should be updated as part of this post-incident review and communicated to relevant employees.

As part of the Post Incident Review safety equipment used to respond to an incident should be checked and replenished as required outside of any regular inspections.

1.6 Conclusions

The assessment of each potential accident/failure scenario indicates that all scenarios pose a low or medium risk providing that the control measures already in place as part of the Company's Management Systems and conditions required by the Environmental Permit are utilised at the Site. The following scenarios retain a 'medium' risk after implementation of current mitigation measures and these scenarios are subject to ongoing review to identify any continuous improvement opportunities that can further lower risks.

- Major fire causing the release of polluting substances to air, water or land;
- Spillage of hazardous chemical; and
- Extreme weather conditions leading to abnormal conditions.

As part of Company Policy and as required by the Environmental Permit in the event of an accident a review will be carried out as soon as is practicable after an incident/accident or at least every four years (whichever is sooner). Any changes identified as a result of these reviews will be made as appropriate.

Appendix A – Emergency Contacts

Position	Name	Telephone Number	Email
Operations Director	Duncan Millar	07776 194274	duncan.millar@cumbriawaste.co.uk
Transfer Station Manager (Seal Sands HWTS)	Neil Trueman	07502 548798	Neil.trueman@cumbriawaste.co.uk
Head of Hazardous Waste	Neil Trueman	07502 548798	Neil.trueman@cumbriawaste.co.uk
H & S Manager	Anthony Hope	07920 651014	anthony.hope@cumbriawaste.co.uk
Group Head of SHEQ	Andrew Simpson	07385 500756	andrew.simpson@cumbriawaste.co.uk
Environment Manager	Pam Tait	07876 552056	Pam.Tait@cumbriawaste.co.uk
Environment Agency	Incident Hotline	0800 807060	n/a
Emergency Services: • Police • Fire • Ambulance • Coastguard		**999**	n/a
Operations Manager (Distington & Derwent)	Craig Cunningham	07787 278312	craig.cunningham@cumbriawaste.co.uk
Operations Manager (Hespin Wood)	Duncan MacMillan	07818 576850	duncan.macmillan@cumbriawaste.co.uk
Operations Manager (Flusco & Middlesbrough)	Gary Hetherington	07880 035116	Gary.hetherington@cumbriawaste.co.uk
Operations Manager (Wicks Barrow)	Andy Orr	07711 854672	andy@wicksgroup.co.uk
HWRC Contracts Manager	Paul Taylor	07823 412987	Paul.Taylor@cumbriawaste.co.uk

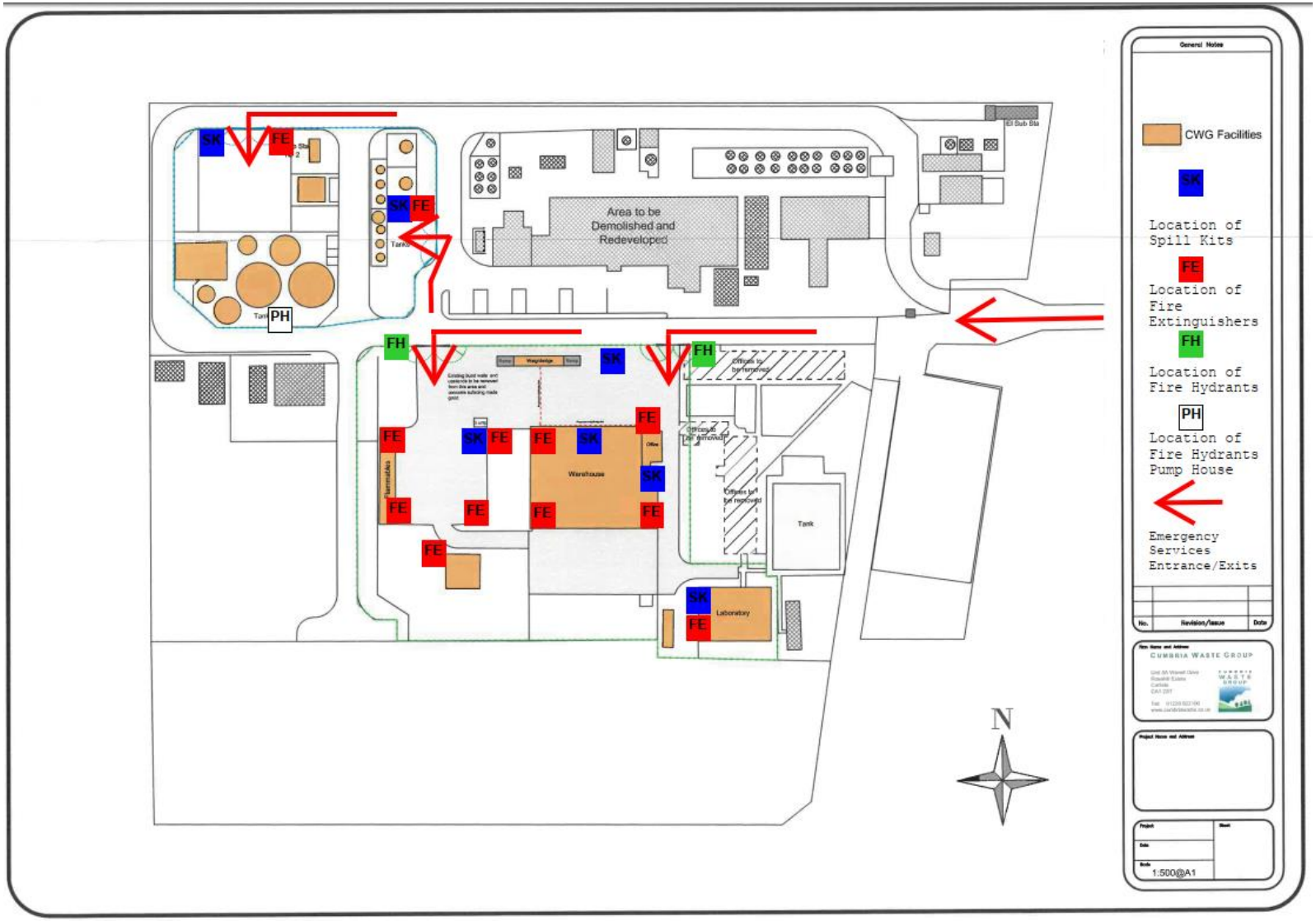
Appendix B – Indicative List of Working Instructions

Indicative List of Working Instructions	
Induction	WI038 TS Bulking chemicals
Dangerous substances & Explosive atmosphere attendance/ DSEAR awareness	WI040 Removal of Liquid Layers from Solid Waste Issue 11 (No Changes)
Working in Hazardous Areas Presentation	WI041 TS Manual Handling Guidelines Issue 11
COTC (CPD) Managing Treatment Operations	WI043 Bulking Waste Liquid into Road Tankers Issue 12
COTC (CPD) Managing Transfer Operations - Hazardous	WI044 Chemical Waste Ops on Customer Sites Issue 12 (Minor Changes)
DGSA - Dangerous Goods Safety Advisor	WI045 Over Drumming & Re Drumming Issue 12 (Minor Changes)
IOSH Managing Safely	WI048 Issue 11 (30/06/23) # TS Emergency procedures
Manual Handling Pristine Condition	WI051 DTS Loading / unloading vehicles Issue 13 (minor changes)
Pristine Condition Traca	WI053 Issue 13 (03/04/24) TS Site segregation & security
Manual Handling Passing on the Principles POPs coach	WI054 Issue 10 (03/04/2024) TS Dealing with Spills & Leaks
IOSH Working Safely	WI055 Non conforming Hazardous waste loads
Forklift (expiry)	WI056 Preparing Packaged Loads for Dispatch Issue 11
First Aid at Work	WI099 Issue 11 (09/07/24) Tankered Waste offloading into IBCs
Fire Safety Training / extinguisher awareness	WI102 Re-fuelling static & mobile plant Issue 10 (No Changes)
Fire Hose Training	WI104 Issue 10 (20/11/23) # Lab chemicals, quotation, packaging, transport, inspection and storage
ADR certificate	WI112 Issue 11 (01/05/2024) Acceptance procedure for Hazardous Waste destined for the transfer station and non haz liquid waste destined for the liquid waste treatment facility
CP004 Visitor & Contractor Control	WI114 Issue 11 (06/03/23) Pre acceptance procedure for Hazardous waste destined for the transfer station and non haz liquid waste destined for the liquid waste treatment facility
CP005 Issue 12 Permits to Work (06/01/25)	WI115 Issue 11 (26/11/24) Sampling Procedure for Hazardous / Non-Hazardous Waste #
PTW (F2F) Training	WI142 Emergency procedures for dealing with liquid spillages

Indicative List of Working Instructions	
CP017 Computer Use & Cyber Security	WI145 Environmental permit notification of abnormal emissions & significant adverse environmental effects Issue 14 (15/11/24)
CP021 Issue 12 (29/09/23) WAC & WAP assessment of waste destined for Landfill	WI146 Issue 10 (20/11/23) # Infrastructure integrity checks
CP038 Issue 8 (06/01/25) Lock out - Tag out - Try out	WI155 Issue 9 (01/05/2024) Sampling & testing of bund water from DTS prior to sewer discharge
CP066 Working in Hazardous Areas Issue 1	WI156 Issue 10 Offloading of non-hazardous tankered liquid waste at Distington LWTF
Safety programme video	WI197 Issue 6 (24/02/24) Emergency procedures at Distington #
P (CMR) Issue 5 CCTV Policy	WI299 Assigning Hazardous Waste Consignment Note codes
GR04 Issue 4 (20/11/23) General Rules Drum Transfer	WI300 Handling Hazardous waste consignment notes at weighbridges etc
GR09 Issue 2 (22/08/23) General rules Puddlers Rd	WI301 Issue 5 (28/04/21) Hazardous Waste Consignee returns to the Environment Agency
SOP035 Seat Belt Use Issue 1	WI302 Issue 5 (10/05/2024) Hazardous Waste producer returns to the waste producers
WI036 Issue 12 TS Operation & Maintenance of Forklift	WI303 Issue 4 (10/05/2024) Waste accepted and dispatched returns to the Environment Agency
WI037 De-heading steel drums Issue 11	

Appendix C – Site Plans

Site plan showing approximate locations of spill kits, fire extinguishers and emergency services entrances/exits.



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