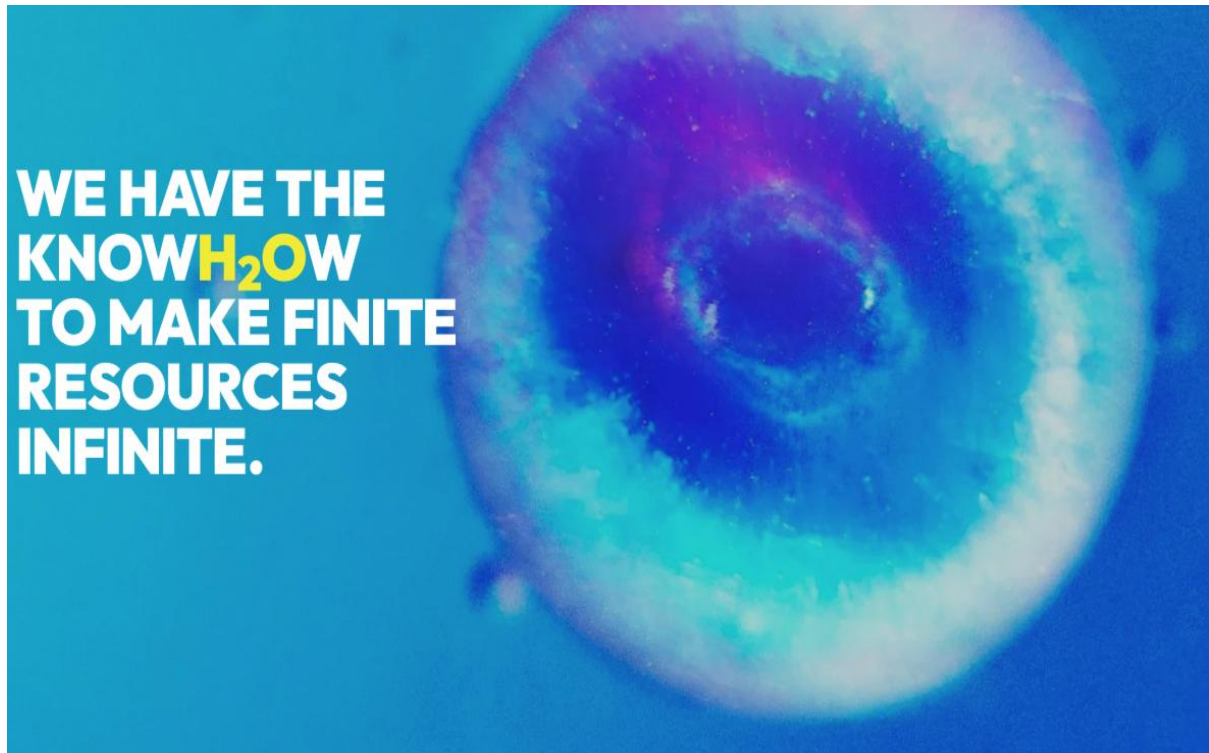


Accident Management Plan (AMP)

Block 8, The Heath Business & Technical Park, Runcorn



Owner:	Matt Rockey	[Security]- Uncontrolled if printed	WCT-POL-003
Author:	Kevin English	Organization: Watercycle Technologies Limited	Page 1 / 21
Publish	12/05/2026	Site: Manchester & Runcorn	Draft

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1. Introduction

- 1.1 This Accident Management Plan (AMP) provides guidance to prevent or reduce the impacts of accidents occurring at Block 8, The Heath Business and Technical Park, Runcorn, Cheshire, WA7 4QX.
- 1.2 This AMP forms part of the ISO14001:2015 accredited Environmental Management System (EMS) for the site.
- 1.3 This AMP has identified risks from the activities carried out that could cause environmental harm, assessed how likely they are to happen, outlined the actions needed to minimise the potential causes and identified how to minimise the consequences if they do happen.
- 1.4 This AMP is a live document and will be reviewed:
 - * Every 12 months.
 - * Following an environmental accident, incident or significant near miss occurs.
 - * Changes to the site environmental permit operating conditions and/or a permit variation.
 - * Upon request by the Environment Agency.
- 1.5 The AMP has been prepared in accordance with the following Environment Agency guidance and legislation:
 - * Risk assessments for your environmental permit
 - * Develop a management system: environmental permits
 - * Environmental Permitting (England and Wales) Regulations 2016
 - * Environmental Protection Act 1990
 - * Health and Safety at Work etc. Act 1974
 - * Dangerous Substances and Explosive Atmosphere Regulations 2002
 - * Regulatory Reform (Fire Safety) Order 2005
 - * Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013

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2. Staff Responsibilities

- 2.1 IMPORTANT: In case of an emergency, employees must only undertake tasks they have been trained and authorised to perform. All employees must inform the site management team immediately of any actions undertaken.**
- 2.2 The Chief Operations Officer acting as Site Manager has overall responsibility for the AMP and is responsible for ensuring all staff receive instruction and training, both formal and informal, in all relevant aspects of operational procedures and Permit requirements.
- 2.3 All relevant staff will be trained in the requirements of this AMP and the EMS. Training requirements are identified through the use of a Competence and Training Matrix which details type and frequency of training, and personal training needs assessments are completed during the annual performance review appraisal system. Training is either delivered by third party suppliers or internally, whichever is most efficient and effective.
- 2.4 The HSE Manager is responsible for monitoring and checking the AMP and confirming arrangements are being followed.
- 2.5 All staff working at the Runcorn site are responsible for:
- * Identifying and reporting accidents and incidents.
 - * Identifying and reporting near misses and potential hazards.
 - * Reporting all accidents to the HSE Manager & Chief Operations Officer (COO).
 - * Completing pre-use checks on plant and equipment being used and reporting any issues as soon as practicable.
- 2.6 All employees should ensure that they are familiar with the fire/emergency response procedures and comply with LEL's guidelines regarding safety arrangement.
- 2.7 All employees on induction shall have the emergency arrangements relevant to their role communicated to them. They shall also receive ongoing safety awareness training throughout their employment.
- 2.8 Visitors/sub-contractors shall receive a briefing on the emergency arrangements for the site as part of their induction
- 2.9 A copy of this AMP and EMS will be kept on site and be available at all times.

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3. Site description

- 3.1 The facility recovers critical minerals from refined black mass (RBM) and water (product water and industrial wastewater) as metal salts and/or hydroxides. There will be two process lines, one for the black mass process and a second process line for the water process.
- 3.2 The water process involves the addition of solid inorganic materials to blend, filter, crystallise, precipitate and dry the finished product, producing metal salts e.g., lithium carbonate or lithium phosphate. The black mass process involves the leaching of the black mass with sulphuric acid and hydrogen peroxide to precipitate out the relevant minerals at different stages. The materials are washed, concentrated, crystallised, processed via a filter press and dried to produce the required mineral products. Neither process produces metals in their elemental form.
- 3.3 Output products include:
- * Lithium salts (carbonates or phosphates dependent on reagent used)
 - * Mixed metal hydroxides (iron, aluminium, copper)
 - * Nickel, manganese, cobalt (NMC) hydroxides
- 3.4 The installation is located in the Heath Business and Technical Park in Runcorn, Cheshire. The immediate surroundings external to the business park would largely be classed as suburban, with larger areas of industrial land use adjacent to the River Mersey to the west, south and north of the Site in Weston Point and Runcorn.
- 3.5 The nearest residential properties are located approximately 210 m to the south-west, and 250 m to the north-east and west. Weston Primary School is located approximately 325 m to the south-west. Within 100 m to the east runs a golf course in a north-south orientation.
- 3.6 The nearest protected habitat site under the Habitats Regulations is the Mersey Estuary Special Protection Area/Ramsar, which at its nearest point is 1.6 km to the south-west. This is also the nearest Site of Special Scientific Interest (SSSI). The nearest local wildlife site is the Runcorn Hill Local Nature Reserve (LNR), which is approximately 700 m to the north-west.
- 3.7 There are no Air Quality Management Areas (AQMA) within the Halton Borough Council area, with the two AQMAs that were previously established for nitrogen dioxide concentrations revoked in 2023.

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- 4.3 The likelihood of each of these potential accidents occurring is dependent on different scenarios, for example, under normal and abnormal working conditions, activities being undertaken and in worst-case scenarios in regard to weather, temperature, or breakdowns.
- 4.4 Each identified accident will be reviewed to determine the likelihood of occurrence and the preventative measures in place.
- 4.5 Where applicable, response actions will be outlined for accidents following their occurrence.

5. Accident and incident response

5.1 Incident or Accident Protocol

On detection of an incident or accident, the COO or Operations Technician(s) becomes the Incident Controller. It is the responsibility of the Incident Controller to:

- * Assess danger
- * Assist in the evacuation process by checking specific areas if required (i.e., if not everyone accounted for) ONLY if safe to do so.
- * Assess response – consult the COO & HSE Manager to decide whether to alert the Emergency Services and / or Environment Agency.
- * Take control of an incident until relieved by the Emergency Services.
- * In the absence of the COO or HSE Manager serve as a single point of contact between the Emergency Services and other involved parties.
- * Ensure that the correct procedures within the Accident Management Plan are followed.
- * Ensure a formal handover takes place if the Incident Controller changes.
- * Assist in a full incident / accident root cause analysis, review lessons learnt and recommend any changes to procedures.
- * Making a record of the accident and the subsequent investigation using the HSE Unplanned Events Tracking System (for actual or potential environmental incidents).

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5.2 Reporting incidents and accidents to the Regulatory Authorities

- * There is a written procedure for reporting incidents and accidents (WCT-SOP-001) pertinent points are described below.
- * To aid reporting of accidents and incidents a list of key emergency contacts is provided in Appendix 1 of this plan. Ensure the list is clearly displayed in the main office and plant areas.
- * At the time of the incident, the most senior person on site is responsible for reporting the incident to the Environment Agency (EA) incident hotline (0800 807060) as soon as practicably possible, and in all cases within 12 hours of the incident or breach of permit conditions.

5.3 All incidents that result in the following must be reported:

- * Damage or danger to the natural environment.
- * Pollution to air, water or land.
- * Any incident which is causing or may cause significant pollution including breakdowns or failure of equipment or techniques and accidents.

Following the incident a record and investigation of the incident must then be made:

- * Using the online HSE reporting system to record the details of the incident, the consequences (pollution/ damage/ breaches etc.), the people involved and immediate response activities that were carried out.
- * Investigating using the online HSE reporting system for incidents with an impact (or potential impact) on the environment finding the root cause(s) of the incident and identifying corrective action(s).
- * Ensuring that a regular review of outstanding actions is undertaken, to ensure that the corrective actions are followed through to completion.
- * On completion of the corrective actions (where identified), updating the form with completion dates and filing the form for future reference.
- * Provide written confirmation to the Environment Agency of all pollution incidents and breaches of emissions **within 24 hours**.

6. Operational controls relating to emergency response

- 6.1 Watercycle Technologies has established and implemented emergency procedures relevant to the operational processes and the organisation's significant environmental risks. These procedures integrate with this Accident Management Plan.
- 6.2 Emergency response procedures will always be adhered to, by all employees and personnel working for and on behalf of the organisation. The company therefore ensures that all emergency response procedures are communicated to personnel to whom they apply.

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- 6.3 Emergency response procedures are reviewed at planned intervals as stated within with the EMS and revised when necessary.
- 6.4 Table 1 below lists the Management System documents relating to Emergency Response that are being implemented.

Table 1: Management System documents (Emergency Response):

Document Reference	Document Title
Overarching Documents	
WCT-MAN-001	Accident Management Plan
WCT-PRF-001	Process Flow for Water System
WCT-PRF-002	Process Flow for Black Mass System
Standard Operating Procedures	
WCT-SOP-001	Accident & Incident Reporting Procedure
WCT-SOP-002	Emergency Response Procedure
WCT-SOP-002 (Appendix 1)	Acid Spillage Procedure
WCT-SOP-002 (Appendix 2)	Alkali Spillage Procedure
WCT-SOP-002 (Appendix 3)	Black Mass Spillage Procedure
WCT-SOP-002 (Appendix 4)	Peroxide Spillage Procedure

7. Substances stored on site

- 7.1 The raw materials used in the process will be stored in fully segregated rooms within the storage area of the building as described in Table 2 below.

Table 2: Substances Stored on Site

Substance Name	Hazardous & Physical Properties	Storage Location
Lithium Containing Water	Irritant Liquid	Main plant room
Black Mass Powder	Carcinogenic, Toxic, Sensitiser Solid	Black Mass storage room
Sodium Hydroxide 32%	Corrosive Liquid	Akaline materials storage room
Sodium Carbonate	Irritant Solid	Akaline materials storage room
Trisodium Phosphate	Irritant Solid	Akaline materials storage room
Sulphuric Acid 96%	Corrosive Liquid	Acidic materials storage room
Hydrogen peroxide 35%	Irritant, toxic, oxidiser liquid	Peroxide storage room

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- 7.2 All substances are clearly labelled and their storage, handling and processing is accompanied by documented procedures along with relevant COSHH and workplace risk assessments.
- 7.3 All storage vessels containing potentially polluting liquids will be stored within the enclosed process building in appropriate containers (e.g., rigid IBCs) constructed of material suitable for the contents, and stored on impermeable hardstanding with additional containment measures in place that meet the requirements of CIRIA C736 Containment systems for the prevention of pollution. Process tanks/reactors will also be used that will temporarily store potentially polluting substances.

These tanks will be designed to be watertight and constructed out of materials suitable for the contents. Where necessary, these will include appropriate lining to prevent thermal shock or chemical corrosion. Other control measures include:

- * Spill kits are available for the clean-up of all materials. The EMS will contain Spill Response Procedures and all site operators will be trained on how to respond to spillages.
- * All waste storage, handling and process areas will be located on impermeable hardstanding connecting to a sealed drainage system.
- * The integrity of these areas will be regularly checked as part of routine maintenance procedures established under the EMS.
- * Drainage onto hard-standing without specific directional flow to a collection point will not be practiced.
- * All areas where waste materials or chemicals will be delivered, or where residues are collected and loaded to vehicles, will be provided with suitable bunds or containment kerbs.
- * All fluids stored in vessels which have a potential impact on the environment will be provided with impermeable secondary containment. Bund capacities will be a minimum of 110% of the vessel volume or, if more than one vessel is located within a common bund, will be a minimum of 110% of the capacity of the largest vessel, or 25% of the total vessel storage capacity, whichever is greatest.
- * Storage vessels, reactors, pipework and fittings will be chemical resistant and using construction materials suitable for the fluid being handled

- 7.4 Handling of emergencies involving these substances, including all spillages, is documented in appropriate emergency response procedures.

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8. Likelihood of accidents/incidents, preventative measures & responses

Table 3 below identifies all the potential accidents/incidents that could take place on site, the consequences of these, what preventative measures are in place to minimise the risks and the response(s) required.

Table 3: Accidents/Incidents, Preventative Measures and Responses

Accident or Incident	Likelihood	Consequence	Preventative Measures	Response
Leaks or Spillages				
Spillage of waste or other raw materials during off-loading of deliveries.	Low	Contamination/pollution of land, drains, ground and surface water courses.	All materials are delivered in UN approved containers and where appropriate on pallets. All containers are inspected for leaks/damage, and are unloaded using an FLT by trained operators and transported inside the building away from drains and unmade ground.	Spill kits are stored on site.
Spillage of waste or raw materials during in-house movement or storage.			All materials are stored in designated storage rooms inside the building away from any surface water drains and on hard standing floors. Infrastructure monitoring checks and 5S audit system in place to regularly check for leaks or any signs of corrosion which could lead to a release.	All operators are trained on how to deal with chemical spillages. An inflatable drain protector is available to stop any releases to site water systems.

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Accident or Incident	Likelihood	Consequence	Preventative Measures	Response
Failure of Plant or Equipment				
Leakages; due to faulty pipe work, valves, over-pressure, blockages, corrosion, severe weather, ground movements etc.	Low	The potential environmental impact of plant or equipment failure is the contamination/ pollution of land, drains, groundwater, and watercourses from the release of raw materials and/or chemicals.	Pre-use checks completed by staff prior to use to check for any faults (e.g., leaks, electrical failure, increased noise, and vibration).	If the failure has resulted in a spill or leak, spill kits will be used to absorb the relevant materials as per the relevant emergency response procedure.
Puncture; of vessels and tanks etc due to impact from vehicles			Planned preventive maintenance and servicing of all plant and equipment is undertaken as per manufacturer guidelines. Only trained operatives use plant and equipment.	
Fire				
Fire (combustible waste, arson, explosion of flammable Hydrogen gas)	Low	The environmental impact of fire is air pollution (from the emissions of smoke and particulates), and generation of firewater which can contaminate/pollute drains, groundwater, and water courses.	Separation of incompatible materials and ignition sources. Incorporation of fire walls and containment of fire water. A no smoking policy is implemented on site. Maintain tidy site and minimise stockpiles of combustible materials. Fire training and emergency drills. Implementation and maintenance of site security measures reduces the risk of unauthorised access and arson.	Emergency response procedure describing what to do in the event of a fire, including details about fire alarms, exit routes and muster points, responsible personnel such as a fire warden and the location and use of emergency fire equipment such as extinguishers, hoses and drain covers.

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			Requirements of a Fire Prevention and Mitigation Plan are implemented on site.	
Cross Contamination				
Due to transfer and mixing of incompatible materials, drainage cross connections etc.	Low	Explosion, smoke and pollution of air. Contamination of land, drains, groundwater and water courses.	Any potentially reactive waste types identified will be separated and stored appropriately. Implementation of strict waste acceptance procedures to reduce the likelihood of accepting incompatible waste. Implementation of standard operating procedures for raw material acceptance and storage, finished product manufacture and storage to reduce the likelihood of accepting, using, transferring or mixing incompatible materials.	Emergency response procedure as described above.
Flooding				
Due to ingress of water course floodwater, blocked drains, burst water main, use of process and/or fire water.	Low – the site is not within a flood zone from rivers or seas	Contamination of raw materials, finished products, buildings, land, drainage system, groundwater and water courses with process, fire and flood water.	Maintenance of site infrastructure and sealed drainage system. Plant and equipment checks to ensure water hoses are not left running for processing and/or washing the finished product. Checking daily weather conditions so flooding due to heavy rainfall is unlikely so mitigation measures can be implemented to minimise the impact.	Flood procedure describing what to do in the event of a flood warning included in the emergency response procedure. If the flooding is due to a burst water main this will be isolated quickly to prevent onsite flooding.

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			Ensure all doors and other exits/entrances are kept closed during bad weather.	
Failure of Utilities				
Due to failure of supply; water, electricity, gas supply and of sewerage system. Due to utility supply being struck and broken / cut.	Negligible	Additional emissions to air associated with abatement plant failure during loss of off-site power.	The caustic scrubber serving the acid leaching reactor will be equipped with local UPS on the pumps and ID fan. In the event of a power failure, with material being processed in the leaching reactor, the UPS will enable continued extraction and abatement of off-gases until a controlled shutdown of the process can be made.	In the event of plant or equipment failure, actions outlined in the EMS should be followed.
Failure of Containment				
Failure of containment facilities due to land movement, impact, corrosion etc.	Low	Contamination of land, drains, groundwater and water courses.	Secondary containment for liquids. Inspection of primary and secondary containment facilities. Integrity checks of tanks and bunds.	Emergency response procedures as referenced above.

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Unauthorised Entry				
Unauthorised entry and tampering, release of chemicals or malicious damage to property, plant, and equipment.	Low	Environmental impact of unauthorised entry is depends on the activities of the trespasser and could include arson, malicious damage to plant and equipment or the deliberate release of chemicals. Environmental impacts can include air pollution, chemical spillages, firewater generation from firefighting or the contamination/pollution of land, drains, groundwater & water courses	Security on the Heath site is 24/7 with CCTV and fire alarm monitoring in place. Site infrastructure is maintained and checked regularly for damage. The building remains locked out of operational hours and requires key card access via the turnstiles, rear gate and main access door. Only Watercycle staff, Security and other key SOG staff have access.	Emergency response procedures as referenced above.

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9. Reporting

9.1 All accidents/incidents will be reported to the Site Manager, HSE Manager and emergency services (where applicable).

9.2 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013), the permit holder will notify the EA of any serious injuries to employees of Watercycle Technologies Ltd, other site visitors or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the HSE Accident & Near Miss reporting portal accessed via the company H&S Share Point system. Automatic notification of any HSE related event is sent to the HSE Manager and company Management Team for review and action. An emergency at the site is defined by the site management as follows:

"Any incident which is likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality."

9.3 For all emergency situations, the receipt of any further waste or raw materials will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the Site or HSE Manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors. A visitor's book will be kept to check who is on site at all times.

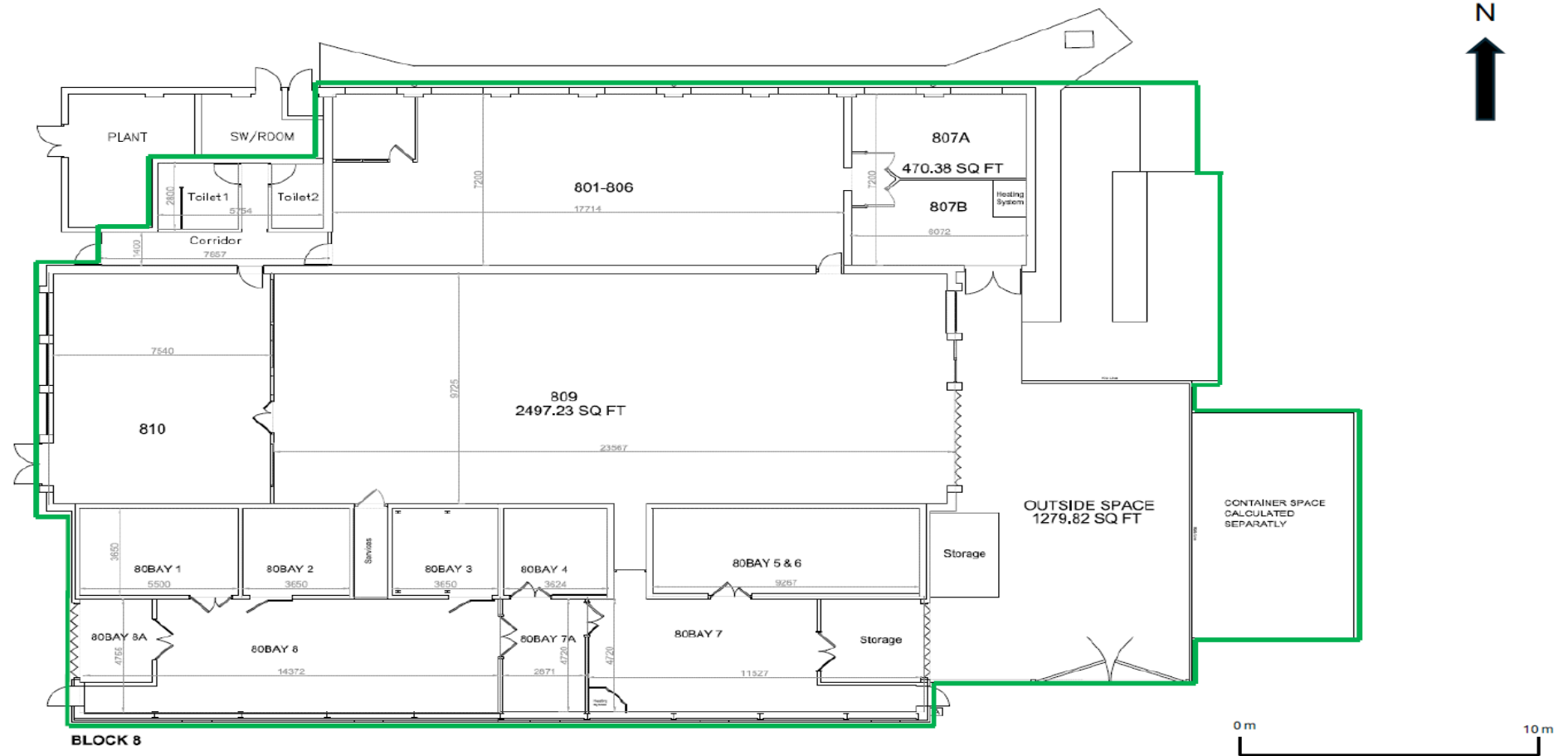
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Appendix 1 – Emergency contact details

Site Address	Block 8, The Heath Business and Technical Park, Runcorn, Cheshire, WA7 4QX
National Grid Reference	SJ 51297 80974
Emergency Contact Details	
Emergency services	999
Local police	101
NHS	111
Heath security	01925 511500 ext. 3999 (Emergency); ext. 5050 (non-emergency)
Environment Agency Incident Hotline	0800 80 70 60
Gas supplier	Emergency gas supply issues are part of the site MI planning and co-ordinated by SOG. Emergency contact for any gas supply issues would be the Security (emergency) contact number above.
Local power network operator	SP Energy Networks (105 or 0800 001 5400)
Water and sewerage	United Utilities (0345 672 3723)
Local authority	Halton Borough Council (0303 333 4300)
Nearest hospital	Accident and Emergencies (call 999 for all life threatening injuries): Warrington Hospital, Lovely Lane, Warrington, WA5 1QG 01925 635911 Urgent Treatment Centre (non-life threatening injuries): Runcorn Urgent Treatment Centre, Halton General Hospital, Hospital Way, Runcorn, WA7 2DA 01925 714567

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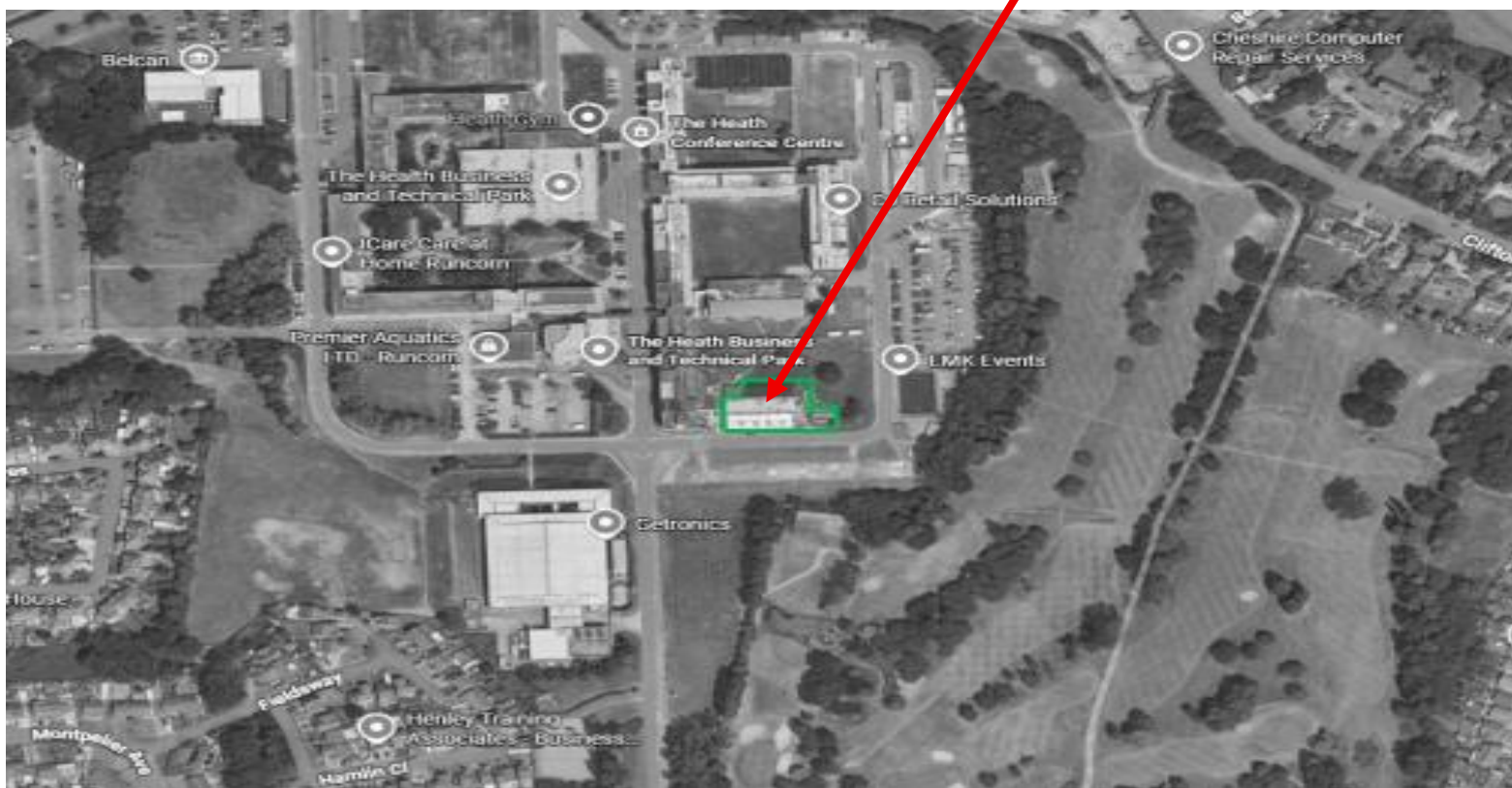
Appendix 2 – Site permit boundary



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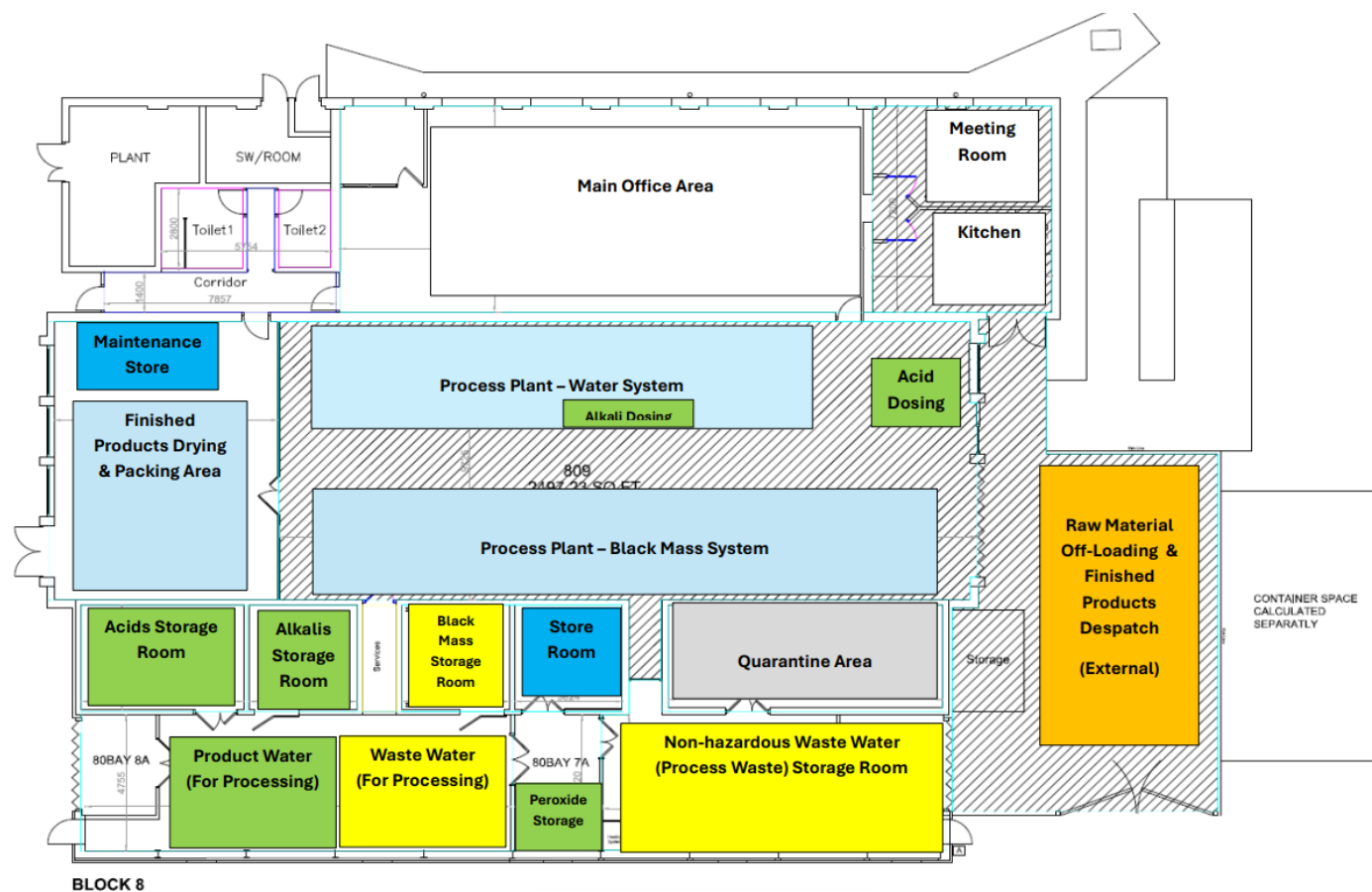
Appendix 3 – The Heath site plan

Watercycle Technologies
Limited: Block 8



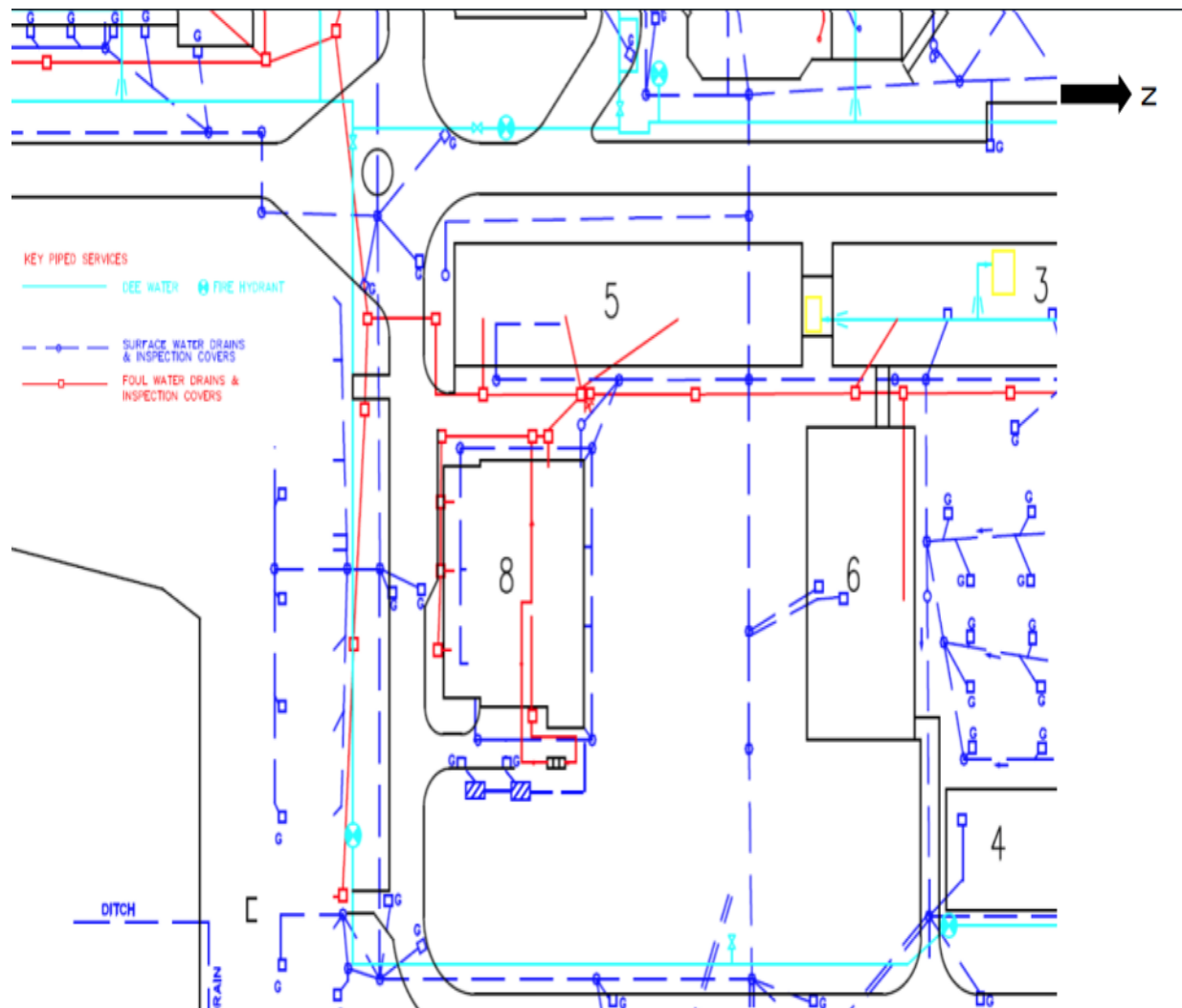
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Appendix 4 – Facility raw materials and waste layout plan



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Appendix 5 – Drainage plan



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