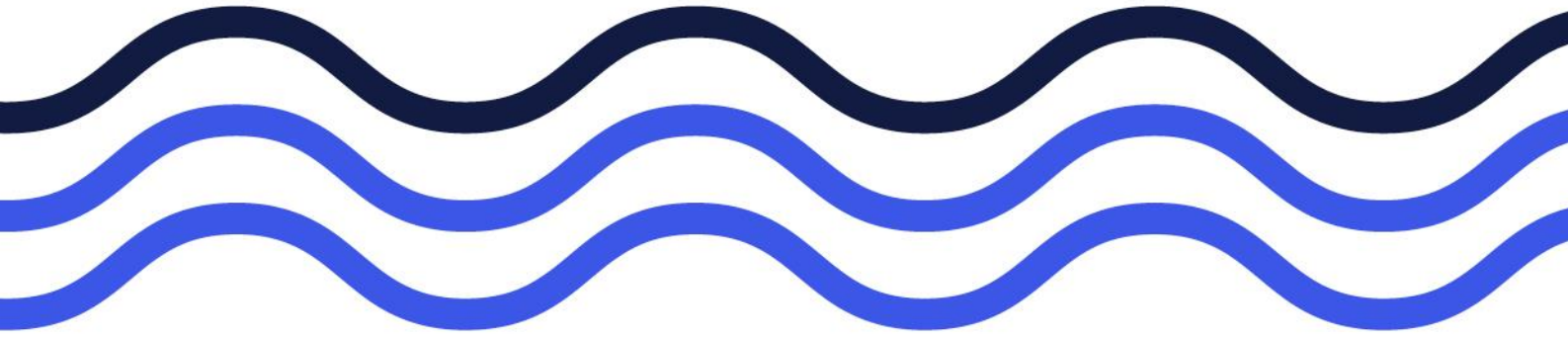
Mitchell Laithes Sludge Treatment Facility: Accident Management Plan



YorkshireWater

Document Control

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Review Period:	Every 4 years or sooner in the event of changes that may impact this plan, including (but not limited to): • Changes to site activities, equipment or management / operational procedures. • An accident or incident on this site, or other similar sites (whether or not these are YW sites) that prompts a review of accident risks, preventive controls and emergency responses measures.

Document Approval

Name	**Name**
David Shaw Policy and Assurance	
Document Owner (Author)	**Document Approval Manager (Tier 3)**

Document Revision History

Version	Date	Revised By	Reviewed By	Amendment Details
1	24/1/2024	David Shaw	Hazel Morgan	New document

Business areas affected by this document
This applies to colleagues that are operating or managing Mitchell Laithes STF.

1. Introduction

In accordance with the Environmental Permit for Mitchell Laithes Sludge Treatment Facility (STF) (permit reference: EPR/VP3730GB), this document presents the Accident Management Plan for the permitted facility.

This plan is established to identify, evaluate and prepare for potential incidents or events that could result in:

- Pollution; and / or
- not being able to comply with permit conditions.

This plan for accident prevention and management follows relevant Environment Agency guidance and includes the following sections:

- Overview of management controls (Section 2)
- Identification of relevant sensitive receptors (Section 3).
- Identification of potentially polluting substances held on site (Section 4).
- Identification potential accidents and incidents and assessment of the overall risk posed by these hazards (Section 5).
- The overall risk of each of the hazard is identified on the basis of the likelihood of the event occurring and the environmental consequence of that event, taking account of:
    - Preventive controls in place; and
    - Actions to be taken in the event of the accident / incident occurring.
- Summary of actions to be taken following an accident or incident occurring, including measures to record, investigate and respond to the incident (Section 6).
- List of emergency contacts (Section 7).

2. Overview of relevant management controls and procedures

YW has an established EMS, which is certified to the ISO 14001 standard. The EMS forms part of a wider corporate Integrated Management System (IMS) which also incorporates quality management, health and safety management, asset management, organisational resilience and business continuity requirements. The management system follows an asset life cycle approach, from design through to decommissioning. Corporate level management system processes are in place, which are supplemented by site-specific documented procedures and processes.

YW has developed processes to identify, respond to and control emergency situations that may cause adverse environmental consequences. Spill kits are readily accessible at locations where there is a risk of spillage (e.g. delivery, storage and areas of use). Spill control toolbox talks are provided to staff. This includes information about how to prevent and control pollution incidents from accidental spills of oils, fuels, sludge and chemicals.

Contingency plans help minimise potential environmental impacts; this includes emergencies arising from breakdowns, enforced shutdowns, abnormal circumstances such as flooding as well as major fire and spill/loss of containment events.

The YW Business Continuity Plan is in place to define and prioritise critical business functions, details the immediate response requirements for a critical incident and details strategies and actions to be taken to ensure business continuity. All Bioresources sites, including Mitchell Laithes STF, have the capability of remote monitoring and remote operation of key functions. A security guard is present on site 12 hours per day Monday to Friday and CCTV security cameras are located across the site with monitoring provided 24/7 by the YW Service Delivery Centre. All buildings are alarmed and high-risk equipment is provided with secondary fencing for added security.

3. Sensitive receptors

A summary of sensitive receptors relevant to Mitchell Laithes STF is provided in Table 1 below.

Table 1: Sensitive Receptors to site

Receptor type	Receptor description and distance
Human	
Residential housing – North	Land immediately to the north of the installation boundary is largely woodland/fields with residential areas beyond (Chickenley area). Some closer residential properties are located to the northwest. The nearest of these properties are: • Pump House Cottages approximately 240m; • Mitchell Laithes Farmhouse approximately 330m; • Scarr End Mill approximately 316m.
Residential housing – East/Northeast	The nearest residential properties are on the outskirts of Ossett, approximately 650m from the installation boundary (Silverwood Grange, Runtings Lane).
Residential housing – West	The nearest residential properties to the West are approximately 750m from the installation boundary (Double Lock House and houses adjacent to Paradise School).
Residential housing – Southwest	The nearest residential property is approximately 430m from the installation boundary. (Lodge Farm)
Residential housing – South	The nearest residential property is approximately 875m from the installation boundary. (Dwellings off Hall Lane)
Public amenity areas including public footpath/cycleway	Kirklees/Wakefield Way passes through woodland approximately 175m to the north-northeast of the digester area. The same paths run adjacent to the northern edge of the eastern digested sludge cake storage area, separated by a hedgerow.
Tennis club	There are tennis courts located approximately 760m to the south of the installation boundary.
Schools	There are 29 schools within approximately 2km of the site, and 5 sites within 1km. The nearest of these is 710m to the western boundary of the digested sludge cake storage area.
Hospitals/healthcare facilities	The nearest medical centre is approximately 1,820m from the northern edge of the installation boundary.

Industrial/commercial sites	Scarr End Mill is the nearest industrial (vehicle refinishers) site located approximately 235m to the northwest of the digester area. The second nearest industrial area is located to the east of the eastern digested sludge cake storage area at approximately 273m.
Ecological	
Habitat sites – statutory designations	There is one internationally designated site approximately 4.5km south of the installation (Denby Grange Colliery Ponds, SAC/SSSI).
Habitat sites – local sites and non statutory designations	The local nature reserve Sparrow Wood LNR is approximately 1,276m to the west of the installation boundary. The site is designated for woodland habitat and associated flora and fauna.
Protected species	Possible presence of protected species on or off sites.
Environment – Other	
Global atmosphere	Local, regional and global atmosphere.
Ground/groundwater	Underlying groundwater classed as a Secondary A aquifer; groundwater vulnerability classed as high.
Surface water	River Calder directly adjacent to installation boundary. Likely hydraulic continuity between underlying groundwater and river.

4. Inventory of potentially polluting materials

In assessing potential accidents and incidents consideration has been given to the potentially polluting substances held on site, including review of their properties, toxicity and the volume stored. 0 details the raw materials stored on site, 0 details the sludge, sludge cake and process liquors stored on site and 0 details the waste materials stored on site.

Table 2: Raw Materials Associated with the Facility and their Potential to Pollute

Substance (Contaminants)	Use	State	Storage Arrangements	Toxicity/ Fate/ Mobility
Polymer (powder)	Coagulant used for thickening undigested sludge and to assist in the dewatering process for digested sludge	Solid	750kg bags in dedicated hopper room within thickener and centrifuge buildings. In each location, the powder is mixed and then diluted, in a series of tanks, and applied to the sludge via a series of pumps and dosing pipework	Polluting to soil and watercourses in the event of a spillage/loss
Polymer (bulk storage of liquid coagulant)	Diluted coagulant used to aid digested sludge dewatering	Liquid	10m^3 bunded stainless steel tank within centrifuge building, located within concrete bund	Polluting to soil and watercourses in the event of a spillage/loss
Polymer (liquid coagulant stored in IBCs)	Coagulant used for thickening of digested sludge for dewatering	Liquid	Temporary use of liquid polymer for dewatering. IBC storage adjacent to centrifuge building, pumped to mixing tanks within dewatering building	Polluting to soil and watercourses in the event of a spillage/loss
Antifoam	Digester antifoaming	Liquid	IBCs (1m^3), decanting kiosk, dosing storage (stock tank of 1.2m^3) and associated pump and pipework located on hardstanding within and adjacent to digester compound	Polluting to soil and watercourses in the event of a spillage/loss
Water treatment chemicals	Boiler treatment	Liquid and solid	Brought to site by contractors for periodic maintenance. Limited storage on site within Gravity Belt Thickener building (on hardstanding in a bunded area)	Polluting to soil and watercourses in the event of a spillage/loss
Glycol	Antifreeze for use in CHP equipment	Liquid		
Biogas	Generated within the AD	Gas	Transferred from AD to gas holder (1,350m^3) for use in the CHP	Volatile and unlikely to pollute watercourses or land in the event of escape

Substance (Contaminants)	Use	State	Storage Arrangements	Toxicity/ Fate/ Mobility
Gas oil	Back up boiler fuel	Liquid	Integrally bunded steel tank. Area surrounding drains to an interceptor. Fill panel and access within locked compartment	Polluting to soil and watercourses in the event of a spillage/loss
Lubricating oil	For use in CHP and other equipment	Liquid	Small intermediary containers (20 litre) stored within designated areas on hardstanding	Polluting to soil and watercourses in the event of a spillage/loss
Diesel	Fuelling of off-road vehicles	Liquid	Integrally bunded steel tank, located on hardstanding at central cake pad	Polluting to soil and watercourses in the event of a spillage/loss
Transformer	Transformer only	Liquid	No storage other than volume in use	Polluting to soil and watercourses in the event of a spillage/loss

Table 3: Bulk Storage of Sludge, Sludge Cake and Process Liquors and their Potential to Pollute

Material	Nature of material	Storage Arrangements	Nominal capacity (m^3)
Raw sludge (un-thickened)	Liquid	Incoming underground and overground pipes from WwTW	-
		Sludge screen feed tank, steel construction, uncovered, c.2009	165
Screened sludge	Liquid	Sludge feed primary storage tanks	-
		Primary storage tanks, No. 1 and No.2, concrete construction, covered, c. 2008	2 x 1,000
		Sludge feed to Gravity Belt Thickeners (GBTs)	-
Surplus activated sludge (SAS)	Liquid	Sludge feed to SAS tanks	-
		SAS tanks, No.1 and No.2, concrete construction, uncovered, c.2010	2 x 1,960
		Sludge feed to Gravity Belt Thickeners (GBTs)	-
Thickened sludge – imported, indigenous primary and indigenous SAS	Liquid	Sludge feed to digester feed blending tank	-
		Digester feed blending tank, concrete construction, covered, c. 2008	1,530
Sludge within digesters	Liquid	Sludge feed to digesters	-

		Digesters x 2, concrete, covered, constructed c.1980 (asset refurbishment 2019).	2 x 5,114
Digested sludge	Liquid	Sludge balance tank, concrete, uncovered, constructed 1979, refurbished 2019	334
		Sludge feed to centrifuge feed tanks	-
		Centrifuge feed tanks x 2, concrete, uncovered, constructed 2008	1,885
		Sludge feed to centrifuges	-
Thickening/dewatering liquor	Liquid	Liquor return from GBT to discharge into WwTW	-
		Liquor return from drum thickeners to discharge into WwTW	-
		Centrate tank, concrete construction, beneath centrifuge building	279
		Centrate pumping station and transfer of liquors to centrate pumping sump	-
Cake	Solid	Concrete pad adjacent to centrifuges	(max) 2,000 tonnes
Run-off from concrete pad	Liquid	Western concrete pad	(max) 4,250 tonnes
		Eastern concrete pad	(max) 3,500 tonnes
		Return pipework (to WwTW)	-

Table 4: Process Wastes and Potential to Pollute (Main app pp.260)

Waste Type	Nature of material	Storage Arrangements	Storage and Disposal Method
Sludge screenings	Non-hazardous	Stored within skips on hardstanding at waste import, prior to collection by approved waste contractors	Collected by approved waste contractor for off-site disposal
Waste oil	Hazardous	Stored in small containers (<50 litres) within bunded areas/containers before removal by maintenance contractors	Collected by approved waste contractor for off-site disposal
General waste	Non-hazardous	Dedicated skips and smaller containers, located on hardstanding at designated points within the installation	Collected by approved waste contractor for off-site disposal
Metals	Non-hazardous	Stored within a skip in designated area	Collected by approved waste contractor for off-site disposal
Empty IBCs	Hazardous	Stored in designated locations within the installation prior to removal	Collected by approved waste contractor for off-site disposal
Oil contaminated absorbents	Hazardous	Dedicated containers (20 litre drum) within digester areas	Collected by approved waste contractor for off-site disposal
Oil filters	Hazardous	Dedicated container (20 litre drum) within digester areas	Collected by approved waste contractor for off-site disposal
Antifreeze	Hazardous	Removed from site when servicing requires (in small containers, <50 litres)	Collected by approved waste contractor for off-site disposal

5. Accident Management Plan

The potential for accidental releases resulting from the activities proposed in this variation application are identified and assessed in Table 5 below. This includes a summary of measures in place to manage/reduce accident risks. Refer to Appendix 1 for the scoring mechanism.

Table 5: Potential accidental releases and associated risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
Site Wide - general						
Flooding leading to damage to site processes and/or mobilisation of polluting materials	Ground / groundwater / surface waters	Floodwaters / Infiltration	**Preventative controls** • Mitchell Laithes STF is built on a hillside. The • majority of the sludge treatment assets are towards the top of the hill and outside all flood zones. • Flood risk review undertaken. A small area of the STF installation lie within Flood Zone 2 (land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding) • Flood mapping shows there is a risk cake pads may be affected by flooding. • Materials are stored in appropriately sealed • containers (preferably bulk or semi-bulk), or proprietary secondary containment cabinets, such that the risk of contents being mobilised or containers being washed away in a flood event is low. • Vulnerable Asset Protection Plan details flooding actions including how river levels	Likely	Medium	Moderate risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
			should be monitored and what actions are required. **In the event of an incident/accident** • Initiate site emergency plan. • Remove mobile fuel/ chemical sources away from flood risk, if appropriate and safe to do so			
Flooding due to drain blockages and/or excessive rainfall causing localised on-site surface water flooding leading to damage to site processes and/or mobilisation of polluting materials	Ground / groundwater / surface waters	Floodwaters / Infiltration	**Preventative controls** • Drains are monitored for blockages and cleaned as required. • Gradient of site means significant accumulation of surface water is unlikely. • Materials are stored in appropriately sealed containers (preferably bulk or semi-bulk), or proprietary secondary containment cabinets, such that the risk of contents being mobilised or containers being washed away in a flood event is low. • Vulnerable Asset Protection Plan specifically details flooding actions. • Planned maintenance / inspection of site drainage systems. **In the event of an incident/accident** • Initiate site emergency plan. • Remove mobile fuel/ chemical sources away from flood risk, if appropriate and safe to do so.	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
Fire	Nearby human receptors Local air quality and global climate impacts Ground / groundwater / surface waters	Air Overland runoff / infiltration / drainage systems	**Preventative controls** • Regular maintenance of equipment; LDAR programme in place. • Fire alarms are fitted in CHP/boiler rooms. • DSEAR assessment has been completed for site and only appropriate ATEX rated equipment may be used in high-risk areas. • Access controls in place for digester compound and portable gas monitor use required when inside compound. • Site does not treat combustible wastes. Sludge is wet. • Gas slam shut valves on biogas feeds to the CHP / boiler. • Gas and fire detection in the boiler/CHP rooms, and other key AD plant areas. • Lightning protection provided for biogas storage. **In the event of an incident/accident** • Follow site emergency procedure. • Hydrants connected to a final effluent supply can be used by the fire service. • Excess biogas created by the site will be burnt through the flare.	Highly unlikely	Severe	Low risk
Failure to contain firewater following fire /	Ground / groundwater / surface waters	Floodwaters / Infiltration	**Preventative controls**	Highly unlikely	Medium *Subject to review*	Low risk *Subject to review*

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
explosion event leading to localised on site surface water flooding leading to damage to site processes and/or mobilisation of polluting materials			• Site drainage systems, hardstanding, sumps, storm tanks etc will minimise flow of firewater to receptors. **In the event of an incident/accident** • Initiate site emergency procedure.			
Excessively low temperatures leading to blockages or damage to pipework, valves or equipment and unplanned release of gas with fire / explosions risks and/or release of potentially polluting liquids	Nearby human receptors Local air quality and global climate impacts Ground / groundwater / surface waters	Air Overland runoff / infiltration / drainage systems	**Preventative controls** • 'Winterisation' procedures. • Bunding provided to environmentally critical plant and equipment. • Current YW technical standards include trace heating for vulnerable pipework. **In the event of an incident/accident** • Isolate systems as appropriate and initiate fire, spill and emergency response procedures, cleaning up spill and disposal of wastes appropriately. • Carry out repairs (as required).	Unlikely	Mild	Low risk
Generalised or localised power failure leading to	Nearby human receptors	Air	**Preventative controls** • Process for recovering from power failure has been planned and recorded.	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
failure of pumps / control systems and escape of sludge and/or biogas	Local air quality and global climate impacts Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	• In the event of power failure, sludge transfers will stop but this will not affect security of containment e.g., tanks will not overflow. **In the event of an incident/accident** • Halt sludge imports to site. • Confirm backup power supply is online. • Confirm that all systems are operating normally.			
Vandalism / site security failure leading to unplanned release of gas with fire / explosions risks and/or release of potentially polluting liquids (chemicals, oils, sludges)	Nearby human receptors Local air quality and global climate impacts Ground / groundwater / surface waters	Air Overland runoff / infiltration / drainage systems	**Preventative controls** • High level of security on site with 24 hr security monitoring, secure entry gate systems and locked cabs and control units. • In addition to perimeter fencing around site, key digestion equipment sits within a separate fenced area. • Storage containers bunded. **In the event of an incident/accident** • Isolate systems as appropriate and initiate fire, spill and emergency response procedures, cleaning up spill and disposal of wastes appropriately. • Carry out repairs (as required). • Review security measures on site.	Highly unlikely	Mild	Negligible risk
Cyber security incident which leads to unauthorised site	Nearby human receptors	Air Overland runoff / infiltration /	**Preventative controls** • YW operates an information security management system to provide cyber security protection and response.	Highly unlikely	Mild	Negligible risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
access and unplanned release of gas with fire / explosions risks and/or release of potentially polluting liquids (chemicals, oils, sludges)	Local air quality and global climate impacts Ground / groundwater / surface waters	drainage systems	• High level of security on site with 24 hr security monitoring, secure entry gate systems and locked cabs and control units. • Storage containers bunded. **In the event of an incident/accident** • Isolate systems as appropriate and initiate fire, spill and emergency response procedures, cleaning up spill and disposal of wastes appropriately. • Carry out repairs (as required). • Review cyber security measures.			
Failure of chemical or oil containment due to deterioration of storage containers, pipework or valves leading to spillage	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** • All oil storage and waste oil storage tanks are fully bunded (using either fixed or mobile bunds). • Joints external to containment minimised and fully welded. • Tank and pipework inspections undertaken as part of routine maintenance. • Operational procedures for refilling oil and chemical storage tanks. Spill kit to be available at tanks. • Any oil spilt around engines during maintenance will be cleaned up and disposed of appropriately. **In the event of an incident/accident**	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
			• Isolate systems as appropriate and initiate spill response procedure, cleaning up spill and disposal of wastes appropriately. • Carry out repairs (as required). • Review systems to prevent recurrence.			
Failure of chemical or oil containment during delivery	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** • Delivery procedures inc. supervision by site staff, check on space available in receiving tank. • Storage containers bunded. • Chemical/oil storage only in area surrounded by hardstanding **In the event of an incident/accident** • Follow incident plan.	Unlikely	Mild	Low risk
Vehicle impact leading to loss of pressurised gas and explosion / fire risk or loss of liquid containment (chemicals, oils, sludges)	Nearby human receptors Contribution to local air pollution and global warming Ground / groundwater / surface waters	Air	**Preventative controls** • Site speed limits in place to reduce chance and consequence of collision. • Tanker discharge point and access to this area are controlled by manned security point at main site entrance. • Key areas including barriers to prevent collision with equipment. • Key digestion assets including digestion tanks are set back from road and surrounded by a fence.	Unlikely	Mild *Subject to review*	Low risk *Subject to review*

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
			• Site drainage will capture spills related to pipe failure and return this to the WwTW for treatment. **In the event of an incident/accident** • Isolate systems as appropriate and initiate fire, spill and emergency response procedures, cleaning up spill and disposal of wastes appropriately. • Carry out repairs (as required)			
Excessive noise from plant or equipment e.g., due to equipment deterioration or failure	Nearby human receptors	Air	**Preventative controls** • Procurement controls mean plant are selected to comply with relevant noise limits. • Regular maintenance completed to ensure equipment operates within normal noise parameters. • Acoustic enclosures / controls on some noise generating plan (e.g. compressors) • Sensitive receptors not located within close proximity to the site. Refer to Table 1 for summary of sensitive receptors. **In the event of an incident/accident** • Investigate cause and implement preventive measures, which may include system maintenance interventions.	Unlikely	Mild	Low risk
Site wide - sludge pipework, tanks, valves						

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What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
Spillage of sludge during transfer / handling activities	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** • Staff training on system operation. • Hardstanding in key/high risk areas. • Surface water runoff from all areas of the site returns to the WwTW for treatment, other than very small areas with low or no risk of sludge spillage. **In the event of an incident/accident** • Isolate systems as appropriate and initiate spill response procedure, cleaning up spill and disposal of wastes appropriately.	Likely	Minor / negligible *Subject to review*	Low risk *Subject to review*
Failure (cracks, splitting) of underground pipework (e.g. fuel, chemicals, sludge, site drains)	Ground / groundwater / surface waters	Infiltration	**Preventative controls** • Existing underground pipework will be periodically surveyed using in-pipe crack detection technology. • Where new pipework at the site has to be underground, the containment provision will be risk assessed and appropriate design specification implemented, which may include secondary containment and leak detection. **In the event of an incident/accident** • Damaged pipe will be isolated. • Spill management procedure will be followed. • Repairs to damaged pipework will be arranged.	Unlikely	Medium	Moderate / Low risk

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What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
Minor failure of sludge storage tanks / digester tanks e.g., tank overtopping, pipework leaks	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** • High level probes to prevent overfilling of tanks. • Trace heating is provided to tank level gauges to prevent freezing and reduce the risk of false readings. • Site is monitored on a daily basis. • Infrastructure maintenance and inspections. • Protective measures as for sludge spillage. • Surface water runoff from all areas of the site returns to the WwTW for treatment, other than very small areas with low or no risk of sludge spillage. • Refer to Secondary Containment Report for details of risk assessment **In the event of an incident/accident** • Isolate systems as appropriate and initiate spill response procedure, cleaning up spill and disposal of wastes appropriately. • Arrange repairs.	Likely	Minor / negligible	Minor risk
Major failure of digester or other sludge storage tank or associated pipework leading to large scale	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** • Design and construction of assets is governed by relevant YW technical standards to ensure it is fit for purpose. • Infrastructure maintenance and inspections.	Highly unlikely	Severe	Moderate / Low risk

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What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
sludge loss/spillage			• Existing and planned bunding / secondary containment (Refer to Secondary Containment Report). • Surface water runoff from all areas of the site returns to the WwTW for treatment, other than very small areas with low or no risk of sludge spillage. **In the event of an incident/accident** • Cancel all sludge deliveries to site. • Isolate systems as appropriate and initiate spill response procedure, cleaning up spill and disposal of wastes appropriately.			
Biogas pipework, valves, vents						
Failure of biogas pipework, valves and biogas holder (corrosion, cracks, material defects etc) leading to **minor** release of biogas and slight fire / explosion risk	Nearby human receptors Local air quality and global climate impacts	Air	**Preventative controls** • Design and construction of pipework is governed by relevant YW technical standards to ensure it is fit for purpose. • Most biogas pipework operates at low pressures. • Pipework/gas holders protected from excessive pressure by pressure relief valves. • Pipework is above ground where possible to facilitate inspection and maintenance. • Maintenance schedule defined as part of LDAR strategy at site.	Unlikely	Minor / negligible	Negligible risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
			• ATEX requirements and use of rated equipment control risk of leak leading to fire/explosion. **In the event of an incident/accident** • Consider need to isolate pipework. • Consider need to initiate emergency response procedures. • Arrange repair to affected asset.			
Failure of biogas pipework, valves and biogas holder (corrosion, cracks, material defects etc) leading to **major** release of biogas and fire/ explosion risk	Nearby human receptors Local air quality and global climate impacts	Air	**Preventative controls** • Design and construction of pipework is governed by relevant YW technical standards to ensure it is fit for purpose. • Most biogas pipework operates at low pressures. Pipework/gas holders protected from excessive pressure by pressure relief valves. • Pipework is above ground where possible to facilitate inspection and maintenance. • Maintenance schedule defined as part of LDAR strategy at site. • Standard operational H&S requires staff to wear personal gas monitors at all times, these will detect large scale leakage from pipes. (PPE and personal gas detectors represent the final layer of protection from a safety perspective and are not relied upon for detection).	Highly Unlikely	Medium	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
			• Requirements around use of ATEX rated equipment control risk of leak leading to fire/explosion. **In the event of an incident/accident** • Immediately follow safety control mechanisms in place to isolate pipework / equipment. • Consider need to initiate emergency response procedures.			
Breakdown or other damage to on site gas consumers e.g. CHP/boiler leading to disposal of biogas without energy recovery	Nearby human receptors Local air quality and global climate impacts	Air	**Preventative controls** • Site is designed to minimise risk of uncontrolled release to air. • Operational and maintenance controls in place to ensure reliability of equipment and minimise requirement to send biogas to flare. • There are three CHP engines and two steam boilers with biogas firing capability, therefore flaring rarely occurs. **In the event of an incident/accident** • Any remaining capacity on on-site gas storage will fill. • Once gas storage is full flare will operate, ensuring proper combustion of biogas. • If flare fails, gas will vent through PRVs to prevent damage to site gas system.	Unlikely	Mild	Low risk
Failure of flare leading to release	Nearby human receptors	Air	**Preventative controls**	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
of unburnt biogas to atmosphere	Local air quality and global climate impacts		• Flare only used as backup in event of problems elsewhere on site. • Flare selected to give minimum 0.3s retention at 1,000 deg. C ensuring full combustion of biogas. • Operational and maintenance controls in place to minimise requirement to send biogas to flare. • Flare has control system that ensures ignition e.g., flame detection. • Maintenance programme in place to ensure that flare is always in good operational condition. **In the event of an incident/accident** • Raise urgent maintenance request for repairs to flare. • If flare fails, valve will automatically shut down flow of gas to flare. • Once all site gas containment is full, pressure will release through PRVs to prevent damage to equipment and uncontrolled release of biogas.			
Incorrect setting or damage to emergency pressure relief valves leads to	Local air quality and global climate impacts	Air	**Preventative controls** • Inspection and maintenance of PRVs carried out on a routine basis to ensure they are set and operate correctly.	Unlikely	Minor / negligible	Negligible risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
premature release of gas or valve fails to reseat after release leading to uncontrolled release of biogas to atmosphere			• Checks on PRVs part of normal operational routine. • Over-pressure alarms in control system will alert site staff to incidents that could trigger PRV release. **In the event of an incident/accident** • Follow management procedures to ensure that the valves are re-seated/pressure setting adjusted rapidly and without putting staff at risk.			
Digester foaming blocks gas lines, leading to release of biogas and/or foam through PRVs	Local air quality and global climate impacts	Air	**Preventative controls** • Feed rate to digesters is controlled to prevent organic overloading. • Digester mixing is regularly assessed as part of operational checks to ensure that it is functioning effectively. • Feedstock assessment ensures that nature and quality of feedstock is understood. • Anti-foam system is fitted to digesters to control foaming. **In the event of an incident/accident** • Follow site procedures for dealing with foaming. • Investigate cause and implement preventive measures. • Ensure that PRVs are not blocked with foam and operating correctly to protect tanks.	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
			• Ensure PRVs reseat once pressure in headspace returns to normal levels.			
Spillage / loss of containment of liquids	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** • Checks on condensate traps and valves are part of regular operational routine. • Condensate runs to site drainage for treatment. • Digester operation is controlled to minimise risk of foaming, which could lead to blockages on condensate system. **In the event of an incident/accident** • Clear up any spills. • Ensure all valves are operating correctly.	Unlikely	Minor / negligible	Negligible risk
Sludge treatment processes						
Import of sludge which does not meet waste acceptance criteria leading to disruption to sludge treatment processes	Ground	Spread to land as part of disposal	**Preventative controls** • YW control all sites supplying sludge to the STF. Only YW sewage waste is imported to Mitchell Laithes STF, this has a consistent composition and comes from carefully controlled treatment processes. • JRP – WaSP system records the dry solids, volume and origin of every import brought to site. • Site operators and tanker drivers are trained to identify problem sludges and divert them to alternative sites for treatment. **In the event of an incident/accident**	Unlikely	Minor / negligible	Negligible risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
			• Digester health will be investigated to understand cause of problem and best route to resolution. • Digestate being removed from digesters will be subject to enhanced monitoring to ensure that there is no environmental risk. Note this is also a HACCP requirement. • Where relevant the Environment Agency will be alerted that a problem has occurred. • The root cause of the problem will be investigated and procedures updated in order to minimise reoccurrence.			
Failure/blockage of sludge screening facility leading to spillage and excess odour emissions	Ground Air	Overland runoff / infiltration / drainage systems Odour to air	**Preventative controls** • Design and construction controls ensure equipment is correctly specified for task. • Maintenance to ensure reliable operation of equipment. • Imports are from YW sites which gives control over content/ • Hardstanding around import facility prevents spills travelling to land. • Site drainage will collect spills and return to WwTW for treatment. **In the event of an incident/accident** • Stop imports. • Clean up spill. • Unblock screens.	Likely	Minor / negligible	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
Sludge contamination leading to inhibition of microbial activity / process disruption and insufficient digestion and build up of H_2S and CO_2	Ground	Spread to land as part of disposal	**Preventative controls** • Management controls to identify potentially problematic sludges at source. • All sludge imports are from YW sites where sludge characteristics are considered stable. • Contamination levels would need to be very severe to significantly impact digestion processes due to the very large digester volume. **In the event of an incident/accident** • Assess digester content to decide best route to normal digester health. • Sample cake prior to export from site to confirm it is safe to spread to land. • Review acceptance procedures.	Highly Unlikely	Medium	Low risk
Excessive feeding of digester leads to reduced retention time and failure to meet pathogen kill requirements	Ground / groundwater / surface waters	Spread to land as part of disposal	**Preventative controls** • Staff training • Digesters have a maximum feed interlock ensuring that a set daily feed volume cannot be exceeded. This limit has been calculated to ensure digester stability and environmental safety. • HACCP monitoring. **In the event of an incident/accident** • Turn off digester feed. • Stop additional sludge imports until normal operational situation returns.	Highly Unlikely	Medium	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
Failure of dewatering process leading to discharge to cake pad of cake with high water content	Ground / groundwater / surface waters	Overland runoff / infiltration / drainage systems	**Preventative controls** • Liquid runoff from sludge cake pad collected and directed to WwTW for treatment. System has large storage and handling capacity. **In the event of an incident/accident** • Switch off centrifuge and identify cause of problem.	Unlikely	Minor/negligible	Negligible risk
Temporary cessation of land spreading e.g. due to extreme weather conditions, leading to build up of digested sludge cake	Local air quality and global climate impacts	Air	**Preventative controls** • There is significant contingency capacity on cake storage pads at Mitchell Laithes. • Additional storage is available at nearby YW sites. **In the event of an incident/accident** • Monitor available storage on cake pad and reduce/stop sludge imports as required. • Divert sludge imports to alternative YW sites for storage.	Likely	Minor/negligible	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
Very warm weather leading to increase in odour generation from sludge cake	Local air quality	Air	**Preventative controls** • Only likely to happen during a prolonged of extreme weather event. • Sensitive receptors not located within close proximity to the site. Refer to Table 1 for summary of sensitive receptors. **In the event of an incident/accident** • Initial response would be to review operating times and avoid cake generation during problematic weather events, considering both temperature and wind. • If this was not sufficient, YW would look to remove cake from site and store elsewhere.	Likely	Minor/negligible	Low risk
Odour extraction and dispersal						
Failure of components within odour extraction and dispersal systems leading to reduced dispersion of odorous emissions to air	Nearby human receptors Local air quality and global climate impacts	Air	**Preventative controls** • Regular operational checks on systems (e.g. fan operation). • Inspection and maintenance schedule to ensure reliability of extraction system. • Sensitive receptors not located within close proximity to the site. Refer to Table 1 for summary of sensitive receptors. **In the event of an incident/accident** • Follow operational procedures to minimise generation of emissions until system is repaired.	Unlikely	Mild	Low risk

What harm can be caused and who can be harmed			Managing the risk	Assessing the risk (after preventative controls)		
Hazard	**Receptor**	**Pathway**	**Risk management**	**Probability of exposure**	**Environmental Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk? What do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? If it occurs – who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains?**
CHPs, Boiler and other gas consumers						
Excessive emissions to air from boilers and CHP e.g., due to equipment failure, poor performance or malfunction leading to incomplete or inefficient combustion	Nearby human receptors Local air quality and global climate impacts	Air	**Preventative controls** • Planned preventative maintenance in place for equipment to ensure assets continue to meet original specification on emissions. • Site operational knowledge supported through contracts with specialist providers. • Regular emissions monitoring timetable in operation to confirm required performance level is maintained. **In the event of an incident/accident** • Investigate cause and implement preventive measures, which may include system maintenance interventions.	Unlikely	Mild	Low risk

Risk Assessment Methodology

The risk assessment methodology employed for the accident management plan is summarised in Tables A to D below.

The overall risk rating for each of the identified risk scenarios is determined on the basis of the probability of the scenario occurring (the probability/likelihood score) and the environmental consequence(s) if the scenario were to occur (the consequence score). The probability and consequence categories used in this methodology are provided in Tables A and B below.

Table A: Classification of Consequences

Classification	Definition
Severe	• Acute risks to human health • Short-term risk of pollution of sensitive water resource (e.g. major spillage into controlled waters) • Impact on controlled waters e.g. large-scale pollution or very high levels of contamination • Catastrophic damage to buildings or property (e.g. explosion causing building collapse) • Ecological system effects – irreversible adverse changes to a protected location. Immediate risks
Medium	• Chronic risks to human health • Pollution of sensitive water resources (e.g. leaching of contaminants into controlled waters) • Ecological system effects – substantial adverse changes to a protected location • Significant damage to buildings, structures and services (e.g. damage rendering a building unsafe to occupy, such as foundation damage)
Mild	• Non-permanent health effects to human health • Pollution of non-sensitive water resources (e.g. pollution of non-classified groundwater) • Damage to buildings, structures and services (e.g. damage rendering a building unsafe to occupy, such as foundation damage) • Substantial damage to non-sensitive environments (unprotected ecosystems e.g. crops)
Minor/Negligible	• Non-permanent health effects to human health (easily prevented by appropriate use of PPE) • Minor pollution to non-sensitive water resources • Minor damage to non-sensitive environments (unprotected ecosystems e.g. crops) • Easily repairable effects of damage to buildings, structures, services or the environment (e.g. discoloration of concrete, loss of plants in a landscaping scene)

Table B: Classification of probability / Likelihood

Classification	Definition
High Likelihood	An event is very likely to occur in the short term, and is almost inevitable over the long term OR there is evidence at the receptor of harm or pollution
Likely	It is probable that an event will occur. It is not inevitable, but possible in the short term and likely over the long term
Unlikely	Circumstances are possible under which an event could occur. It is by no means certain that even over a longer period such an event would take place, and less likely in the short term
Highly Unlikely	Probability is so low that it is close to zero; It is improbable that an event would occur even in the very long term

Table C below provides the matrix used to identify the overall risk category using these consequence and probability categories.

Table C: Risk Matrix and Terminology Used for Risk Assessments

		Consequence			
		Severe	**Medium**	**Mild**	**Minor/Negligible**
Probability (Likelihood)	**High Likelihood**	Very high risk	High risk	Moderate risk	Moderate/Low risk
	Likely	High risk	Moderate risk	Moderate/Low risk	Low risk
	Unlikely	Moderate risk	Moderate/Low risk	Low risk	Negligible risk
	Highly Unlikely	Moderate/Low risk	Low risk	Negligible risk	Negligible risk

The overall risk categories are described in Table D below.

Table D: Description of Risk Categories

Term	Description
Very high risk	Severe harm to a receptor may already be occurring OR a high likelihood that severe harm will arise to a receptor, unless immediate remedial action works / mitigation measures are undertaken.
High risk	Harm is likely to arise to a receptor, and is likely to be severe, unless appropriate remedial actions / mitigation measures are undertaken.

	Remedial works may be required in the short term, but likely to be required over the long term.
Moderate risk	Possible that harm could arise to a receptor but low likelihood that such harm would be severe. Harm is likely to be medium. Some remedial works may be required in the long term.
Moderate / low risk	Possible that harm could arise to a receptor, but where a combination of likelihood and consequence results in a risk that is above low, but is not of sufficient concern to be classified as medium. It can be driven by cases where there is an acute risk which carries a severe consequence, but where the exposure is unlikely.
Low risk	Possible that harm could arise to a receptor. Such harm would at worse normally be mild.
Negligible risk	Low likelihood that harm could arise to a receptor. Such harm unlikely to be any worse than mild.

6. Accident and Incident Response

Accidents and Incidents are managed in accordance with the Incident Management policy and procedures and Emergency Planning manual.

YW utilises the Nintex app to report, record, manage and assess incidents and accidents. This is available on phones and handheld devices of YW staff and provides an auditable record for every incident. Relevant forms used to record accidents are available electronically via this system.

In the event of a significant incident a root cause analysis is conducted. Actions are identified, reported, recorded and communicated to prevent reoccurrence.

Complaints are typically received by YW central Customer Services team, where all complaints are logged on the ICE system. Complaints relevant to Mitchell Laithes STF are passed on to the Site Manager for further investigation. The Site Manager is responsible for ensuring that any complaint is investigated and, if found to be justified, that work is undertaken to resolve the issue, including liaising with the relevant regulatory bodies where appropriate. The Customer Service Team ensure an appropriate response to the complainant in a timely manner including, if and as appropriate, detailing the reason behind the issue and the actions taken to resolve the matter.

All complaints information is recorded on the ICE system in order that this can be monitored, reviewed and analysed.

If an incident with potentially significant environmental consequences occurs, YW will notify the Environment Agency without delay, and in accordance with the procedures and requirements specified in the site environmental permit.

7. Emergency contacts

Area	Contact
Mitchell Laithes STF Contacts	Site Manager: Mick Flanagan – 07790 617673 Site Optimiser: John Bullivant – 07790 617692
Barnsley Council	01226 787787
Environment Agency	0800 807060

8. Definitions

Definitions of Terms Used:	
Yorkshire Water	Yorkshire Water is used in this document to refer to Yorkshire Water Services Limited and all other subsidiary companies within Kelda Holdings.
Anaerobic Digestion	AD is used to refer to anaerobic digestion. The process which imported waste is subject to at this sewage treatment facility.
CHP	Combined Heat and Power

9. Compliance with this document

Colleagues shall comply with the requirements of this document, in line with the company Conduct Policy.

10. Assurance

Regular monitoring of compliance with these requirements shall be undertaken by the assurance providers documented as part of the Assurance Framework.

Any sampling that is undertaken will be taken in accordance with sampling procedures as documented in the internal guidance document Operator Self-Monitoring, which can be found on the Integrated Management System. Samples must be tested at a UKAS accredited laboratory.

11. Related Documents

N/A