



Warwick Chemicals
Mostyn, Holywell, Flintshire

Revision of Accident Management Plan

November 2014

Introduction

Warwick Chemicals has been issued with an Environmental Permit (BU 2357, as varied).

Section 2.8 of this permit requires the company to:

“ 2.8.1 The company shall maintain and implement when necessary the accident management plan submitted or described in response to section 2.8 of the Application. The plan shall be reviewed at least every two years or as soon as practicable after an accident, whichever is the earlier, and the Agency notified of the results of the review within two months of its completion”.

Background

The Mostyn site is classified as an Upper-Tier COMAH site, and as such, the site has a major accident prevention policy (MAPP) and an on-site emergency plan. The local council (Flintshire County Council) have also drawn up an off-site emergency plan.

These policies and plans are reviewed on a regular basis and when there are any significant changes to the site operation.

The on-site and the off-site emergency plans are also tested by carrying out desk-top exercises and full scale exercises involving the emergency services and all the related regulatory bodies.

Review

The following subjects have all been scrutinised to assess their on-going suitability and relevance to an emergency situation that may occur on the Mostyn site.

On-site emergency plan

The on-site emergency plan (EP01) was written with consideration of the hazard scenarios identified in the COMAH Safety report (submitted in March 2013) and in consultation with Flintshire County Emergency Planning Officers, North Wales Fire & Rescue Service, the ambulance service and North Wales Police.

The on-site emergency plan was reviewed and revised in June 2014. The contents are now quite extensive and cover the major COMAH scenarios identified in the Safety Report. The scope of the on-site and off-site plan covers the full range of potential site emergency incidents e.g.

- Fire /Explosions
- Loss of containment/ releases of process chemicals/raw materials
- Serious environmental occurrences
- Major injuries to people/persons present on site
- Off site incidents involving Warwick products

On Site Emergency Arrangements

On joining the company, during initial induction, all staff receives instruction on the required response to a site emergency. There has been a move away from the traditional instructions about fire fighting and employees are now instructed to simply activate the nearest alarm and evacuate the building. The on-site emergency response team will deal with any fire.

Contracting company staff receive instruction concerning emergency procedures by the use of a safety induction DVD. Visitors receive detailed information on the passes issued to them upon first entering the site. Visitors will also be accompanied at all times whilst on site – unless they are inducted.

In the event of any incident occurring that may have potential serious consequences the standing instruction for staff, visitors or contractors is to raise the alarm using any one of the available methods, e.g. telephone, radio, break-glass point.

A number of staff have been assigned specific duties in the event of a site incident. Appropriate training has been carried out for those staff designated under the on-site emergency plan.

Emergency Response Teams – Training and Drill exercises

The Emergency Response Teams are made up of five teams, all from the manufacturing department. They are trained to use emergency response equipment and to respond to a number of emergency situations including fire, confined space rescue, search and rescue from buildings, damage control (salvage) activities and spillage/environmental impact control.

Emergency Equipment

The Mostyn site is provided with a centrally located fire station equipped with a fire engine. This station is run and maintained in accordance with fire service procedures. A range of fire hoses, standpipes and nozzles are located at the station as well as retained on the fire engine. Specialist external contractors maintain the hoses whilst other items of fire fighting equipment are inspected and maintained by the Emergency Response Teams as part of their 'standard checks'.

A reserve store of fire fighting equipment is located at a location remote from the main site. An underground fire hydrant ring-main is installed on site and fire hose connections have been added to the main water storage tanks to provide the primary fire-fighting medium. A supply of appropriate fire fighting foam is provided in a portable bowser and transportable drums.

There is also an alternative water supply to the site providing a back-up to the mains water supply and this water supply has its own ring main round the high risk areas on site.

Other equipment provided for use by the site emergency squads is selected for suitability with reference to the identified scenarios within the site COMAH safety report and other emergency situations, e.g. acute medical conditions, rescue requirements or significant spillage incidents not otherwise covered.

Other subjects (listed below) have been reviewed and are part of an on-going maintenance schedule or are subject to scheduled or annual checks as part of an on-going programme:

- Escape routes/Emergency lighting
- Alarm systems & communication equipment

- Emergency vehicle management
- Spillage control equipment
- Vapour suppression
- Emergency shut-down
- First aid provision

Other Mitigation

The Mostyn site is in the final stages of an up-grade to its current fire detection and asset protection system. This is in addition to the installed dry riser system that is currently installed on a number of the process intermediate storage tanks in the production areas. The fire detection system in each of the finished product warehouses is being up-graded. Fire detection is being provided in all the production plant and tank farm bund areas with foam pouring systems installed in Plant 5 bund and FD2 bund.

Off-Site Emergency Planning and Response

As a site that falls under the Control of Major Accident Hazard Regulations (COMAH), an off-site emergency plan has been produced to ensure adequate response from the external emergency services, to identified major incidents. The production of this plan is the responsibility of the Country's Principal Emergency Planning Officer. Liaison between the Company and the Country Emergency planning officer is the responsibility of the HSE Manager.

Conclusion

A review of this area of the site operations has not highlighted any major deficiencies. The procedures for accident management are still current and the overlying procedures and operations are still felt to be suitable and sufficient for the operations on the Mostyn site.

With the on-site emergency plan there is one area that is constantly under review and that is the role that is played by the operational staff. From time to time employees move from one department to another and their availability to carry out a particular role changes. When this happens another employee is nominated to pick up this role.

Although the off-site emergency plan is the responsibility of Flintshire County Council it is our responsibility to inform them of any significant changes to the site operation so that the necessary changes can be made. There have been no significant changes to the site operations that requires any change to the plan. An off-site emergency desktop exercise was held in March 2014 with no significant findings identified for the Warwick site.

Peter Bryant
Health, Safety & Environment Manager
November 2014