

DM Appendix 1



Environmental Emergency Response Plan

Issue Number	Reason for Change	Issue Date	Issued By
1	1st issue of ERP	Nov 17	Mike Howard
2	Inclusion of Power Outage Section	Oct 18	Mike Howard
3	Inclusion of Diesel Storage	Jun 19	Mike Howard
4	Including the Preventing, preparedness and response plans	May-19	Suzanne Gray
5	Update of contact details	Aug 22	Sean Hutchinson

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Introduction

Our Emergency Response Plan (ERP) must be used to deal with any incident on site that has potential to cause a significant environmental impact. The information in the ERP may also help the emergency responders produce their own response plan for our site.

Our ERP plans for the most foreseeable types of incidents:

1	Flood
2	Fire
3	Spillage
4	Ammonia gas leak

This is an outline for the measures we must take to prevent, minimise and mitigate the effects on the environment, our staff, neighbors' and the site infrastructure if an accident or emergency occurs.

Emergency contacts list – For all Emergencies

If there is an emergency at the site the relevant people must be alerted and we must contact our neighbours if they could be affected.

Contact	Telephone Number
Senior Management Team	01978 802337
Emergency Response Team • H&S Manager • General Manager • Engineering Manager	Contact numbers held in Security
NRW - Incident Hotline: (24 hour)	0800 807060
NRW Customer Contact Centre	0300 065 3000
NRW Site Regulatory Officer – Phil Harper	03000 653 717 Mob:07890025506
Flood line	0345 988 1188
Police / Fire & Rescue	999
Food Standards Agency	07887 624 991

Depending on the type and extent of the emergency, further assistance may be obtained from key contacts.

Key Contact	Telephone Number
Specialist clean up contractors	01978 661 866
Animal by product collector & back up collector	01226 762 175
Environmental Consultant (Adrian Kesterson)	07845 668696
Effluent treatment plant contractor (CAP)	01948 820 317
Chemical scrubber contractor (Orchard)	01902-408766

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For all Emergencies Ensure the following are in place:

Item	Yes / No	Comments
Delegated person(s) has been appointed and trained to act as the incident response co-ordinator?	Yes	Senior Management Team
Is there a safe and secure location to use as an incident room in the event of an emergency?	Yes	Numerous
Are emergency response plans and key contact telephone numbers readily available?	Yes	Above
Do we know how to shut off all utility supplies? Water, Gas, Electricity	Yes	Engineering Department
Have we identified plant / equipment to shut down in terms of priority? Can some plant be shut down in isolation? Check if key plant e.g., chiller, ETP, scrubber can be kept operational?	Yes	Engineering Department
Do we have an evacuation plan and does it include an easy way to inform our staff about evacuation?	Yes	Fire & Ammonia
Is there a safe place where staff can shelter without cause for panic?	Yes	Numerous

1. Flood

The objective of this is to minimise the risk of the site flooding and to ensure that in the event of a flood occurring it is identified as early as possible and effective measures are implemented to protect the site and minimise the environmental impact.

The installation is just outside the River Dee Flood Plain and is on elevated ground so is unlikely to be flooded by the river. Extreme rainfall events could cause surface water run off flooding however.

1.1 Planning for a flood

The flood planning checklist is for dealing with a flood, to review our risks and identify actions to be fully prepared for a flood if it happens.

Item	Yes/No	Comments
Is site registered to receive NRW flood warnings? Are our details up to date?	Yes	
Do any transformers need to be protected from flooding?	Yes	
Are there permanent physical protection measures around site borehole? or else devise temporary measures to deploy on receipt of flood warning	Yes	
Do we have available flood protection equipment to reduce the risk of damage to property, stock and equipment?	Yes	Refer to Sandbags & how to use them for flood protection Guide
Do we know which roads will stay open in our area during a flood?		See Flood risk maps

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1.2 Flood protection equipment / materials

Materials	Used for
Sand and sand bags (unfilled), shovel	Creating floor barriers (used with plastic sheeting)
Tools – hammer, nails, saw	Boarding up doors, windows and openings, creating shelves
Wood – plywood, blocks of wood	Boarding up doors, windows and openings, creating shelves
Sturdy plastic sheeting	Sandbags, pulling up around furniture and appliances
Strong plastic bags	Putting around legs of tables and chairs
Pallets	Raising stored stock above flood level
Emergency power generator	Maintaining function of air conditioning units (can help dry out a building), running fridges and freezers

1.3 Immediate Flood Response

If we receive a flood warning or adverse weather warning of extreme rainfall or snow, we must undertake the following tasks to protect the site and be prepared for imminent flooding. A copy of this list should be used to record the actions taken.

1.4 Tasks if flooding imminent

Task	Responsible	Completed?
Incident response co-ordinator(s) to be alerted and incident room prepared.		
Alert staff to be prepared to implement evacuation procedure		
Contact customers and suppliers to put production contingency plans on standby		
Have engineers on standby to shut off electric supplies to plant that could be affected, quickly and safely		
Arrange to deploy emergency power generator and emergency lighting		
Check that any items of plant, equipment, skips or containers are secured and cannot cause damage to site infrastructure or be washed offsite		
Move site & staff vehicles to a secure area outside the expected flood area		
Keep site inventories as low as possible during the flood warning period		
Move any sensitive materials or loose stocks to the most elevated areas of the site and ideally inside on an upper level / platform		
Get sand bags and other materials ready and deploy to form physical barriers across building doorways to keep floodwaters out.		
Monitor weather forecast and flood warnings and check the site for signs of initial flooding		
Alert the gatehouse to restrict access to site and instruct staff / contractors already on site to keep off the installation or affected areas until advised flood is over		
Update senior management, staff and the authorities accordingly.		

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2. Fire Prevention Planning

Here is a list of combustible, flammable, explosive or hazardous substances that are present on site which could start or contribute to a fire or cause adverse environmental effects or dangers in the event of a fire.

Combustible, flammable, explosive or hazardous substances

Material	Storage location / arrangements	Management controls to prevent fire or spillage in event of fire
Paper or cardboard (compactor unit)	Waste area. Compactor unit metal skip	Compactor inspected & maintained, located away from main buildings.
Plastics	Waste area. Metal skip	Located away from main buildings
Wood	Waste area. Metal skip	Located away from main buildings
Waste electrical and electronic equipment	Waste area. Metal skip	Located away from main buildings
Carbon filters	ETP DAF unit & Sludge tank. Sealed drums / canisters	Maintenance & inspections & replacements as per schedule
Flammable liquids / aerosols • Paints • Varnishes • Solvents • Lubricants • Greases	Flammables store in engineering workshop	No smoking policy
Chemicals / fuels • Ammonia • Glycol • HFC refrigerants • Detergents • Degreasers • Hypochlorite • Caustic (Scrubber) • Caustic (ETP) • Ferric chloride • Polymer • Gas oil	In main chiller In main chiller In chiller units Utilities area - IBCs Utilities area - IBCs Scrubber - IBC Scrubber - IBC ETP - Bunded tank ETP - Bunded tank ETP - IBC Bunded tank	Pressurised system with controls / alarms, maintenance IBCs held in utilities store and contents transferred to cleaning equipment via lines. Scrubber IBC levels checked daily. IBCs housed on bunded trays. Bunded tanks.

Areas which could be vulnerable to a potential ignition source are listed along with the controls in place:

Potential source	Management controls
Arson or vandalism	Site is manned 24/7 with site security, CCTV and secure perimeter
Plant or equipment failure	Fans / drives overheating due to lack of maintenance – PPM covers inspection and lubrication of plant.
Naked lights	No smoking policy / designated area
Carbon filters	ETP DAF unit and sludge tank. Maintenance & inspections of filters, replaced according to schedule.
Hot works (e.g., welding or cutting)	Engineering workshop, plant / site - permit to work system
Hot exhausts	Boilers – insulated pipes / flues
Damaged or exposed electrical cables	PPM, Incident reporting.
Incompatible wastes	There are no waste streams which are incompatible and which could cause a fire

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Electrical faults	PPM
Discarded smoking materials	No smoking policy. Designated smoking area is located away from the main building and is clear of combustible materials
Industrial or workplace heaters	There are no industrial or workplace heaters on site. If there is a requirement for these then they will be controlled by permit to work
Open burning (on site or adjacent sites)	No burning of waste or other materials is permitted on site. No other adjacent sites close enough to provide pathway for fire to spread to our site.

2.1 Fire preparedness

The fire prevention and response planning checklist are used to plan for dealing with a fire, review our risks and identify actions to be fully prepared for a fire if it happens.

Item	Yes/No?	Comments
Are emergency and key contact telephone numbers readily available?	Yes	See Maelor Foods Fire Log Book
Is site registered with the local fire & rescue service? Are our details up to date? Has the fire service inspected the site? Have their recommendations been addressed? Are there suitable access routes to and through the site for the emergency services to carry out their work?	Yes	
Have we identified any dangerous materials or substances, explosives or gases and marked their location on the site plan in the emergency response plan?	Yes	Refer to Table above
Is there a sprinkler system? If so, is it serviced and inspected?	No	
Do we have available sufficient firefighting equipment / extinguishers and are they inspected / serviced?	Yes	
Is there a suitable source(s) of water available for the fire service to use for firefighting?	Yes	
Do we have appointed & trained fire wardens? Are staff trained on fire response and safety procedures? Can our staff work quickly and efficiently to protect themselves and the business in the event of a fire?	Yes	
Do we have an evacuation plan and does it include an easy way to inform our staff about evacuation?	Yes	
Is there clear signage to identify fire exits, assembly points and fire doors? Are the assembly points marked on the site plan in the emergency response plan?	Yes	
Do we undertake regular tests of the fire alarms? Do we undertake regular fire drills and evacuation drills?	Yes	

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2.2 Fire response

Upon discovery of a fire on site we must undertake these tasks to protect our staff, the site, our neighbours and the environment. A copy of this list should be used to record the actions taken.

Task	Completed?
Raise the fire alarm by activating the closest, safe alarm point. Do not tackle the fire unless it is safe and you are competent to do so. If tackling the fire use the appropriate fire extinguisher	
All members of staff must immediately evacuate the site and assemble at the designated assembly point and wait for the Site Fire Warden(s) to check the staff register.	
The emergency services must be contacted immediately – call 999 Alert the senior management team.	
Incident response co-ordinator(s) takes control of management of incident and incident room opened if safe to do so. Alert Senior Management Team.	
Contact our suppliers, contractors and clients who may be sending staff or material to site or expecting a delivery from us. Implement contingency plans for production.	
Alert the gatehouse to restrict access to site and instruct staff / contractors already on site to keep off the installation or affected areas until advised that the fire is over	
Shut off electric supplies to plant that could be affected, quickly and safely if safe to do so	
If safe to do so, follow the Spill Procedure to close off the site drainage to prevent water and land pollution from fire-fighting waters and divert the inlet to the ETP to the divert tank. The Fire & Rescue Service may be able to assist with this.	
Short term air pollution from fire is unlikely to affect air quality for the small number of closest houses to the site. The wind direction is indicated by the wind sock at the gatehouse and should be observed to identify the direction any contamination will travel. The emergency services will decide whether to instruct residents to close windows for short periods if wind is blowing smoke in their direction.	
If the chiller unit is affected by a fire there could be an escape of ammonia gas. The emergency services will decide whether to instruct residents / staff to remain inside with windows closed until the emission has stopped and dispersed. See also Response to an ammonia gas escape.	
Update senior management, staff and the authorities accordingly	

3 Major spillage

The objective of this is to minimise the risk of a spillage of polluting materials and ensure if in the event of a spillage it is identified as early as possible, and effective measures are implemented to protect the site and minimise the environmental impact.

The installation discharges treated effluent and site drainage to the River Dee, a very high-quality watercourse, designated habitats site and potable water supply. The underlying aquifer is also very high quality and used as a water supply for Maelor Foods and other nearby industrial users. It is essential that these environmental features are protected from pollution.

3.1 Materials that can cause water pollution

Area / application	Haz sub	Environmental fate	Storage location & arrangements	Management controls to prevent spillage
By product - Blood – category 3	No	Biodegradable – high BOD & ammonia – very polluting in surface waters – will strip oxygen from watercourse killing fish and invertebrate life	Tank inside offal building.	Internal drains lead to ETP served by divert tank. Level alarms on tank to prevent overflow. Blood collection procedures. Blood tanker loading point drains to internal drainage to ETP.
Bore Hole Abstraction - Sodium hypochlorite	Yes	May cause long-term adverse effects in the aquatic environment.	Bunded IBC in the area of the borehole	IBC’s containers in bunded area or integrated bund trays
Diesel Storage Tank and pumping station - Diesel	Yes	May cause long-term adverse effects in the aquatic environment.	Double Skinned bulk storage tank located within secondary containment concrete bund	Internal drains flow through 2 x interceptors, diesel stored in double skinned tank which is housed inside an impermeable concrete bund. Key fob-controlled fuelling and all hoses and attachments contained within bunded area
Diesel Storage Tank and pumping station - Ad Blue	No	May cause long-term adverse effects in the aquatic environment.	Double Skinned bulk storage tank located within secondary containment concrete bund	Internal drains flow through 2 x interceptors, diesel stored in double skinned tank which is housed inside an impermeable concrete bund. Key fob-controlled fuelling and all hoses and attachments contained within bunded area
By product - ABP – category 3 or 2	No	Biodegradable – high BOD & ammonia – very polluting	Trailers / skips located inside offal building.	Internal drains lead to ETP. ABP collection procedures.
Combustion in old boilers, vehicle fuelling - Gas oil (low S content)	Yes	Immiscible, floats on water. Moderate to high toxic effects and bioaccumulation potential	Bunded storage tank(s) – old boiler house,	Delivery by tanker and offloaded to bulk tank as per chemicals delivery procedure. Level controls on tank.
Cleaning of vehicles, crates, process equipment & floor areas - Detergents / degreasers / sterilisers	Yes	Biodegradable - will strip oxygen from watercourse killing fish and invertebrate life	Inside utilities area in plastic containers, drums or IBCs	IBCs held in utilities store and contents transferred to cleaning equipment via lines.
ETP – raw effluent, pH control, flocculants, sterilisation - Raw effluent, Caustic, Ferric chloride	Yes	May cause long-term adverse effects in the aquatic environment. Readily degradable in water. Iron compounds are mainly resistant to degradation.	ETP – bulk storage tanks	Chemicals delivered by vehicle or tanker & offloaded to bulk storage tanks as per chemicals delivery procedure. Integrated bunded storage tanks with level protection. IBC’s containers in bunded area or integrated bund trays. Bulk effluent tanks are fitted with level sensors, corrosion inhibitors. ETP area has earth bund & sloping to catchment pit in case of spillage
Phosphoric acid	Yes		ETP - plastic containers, drums or IBCs	
Polymer	No			
Anti-foam	No			
Chemical scrubber - Sodium hypochlorite / Caustic	Yes	May cause long-term adverse effects in the aquatic environment.	IBCs in bunded areas by scrubber or inside utilities area	Scrubber IBC levels checked daily. IBCs housed on bunded trays.
	Yes			

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Refrigerant - Ammonia / glycol	Yes	Ammonia in gaseous form. Glycol in liquid form – readily biodegradable, high BOD	Pressurised vessel	Refrigeration management system and automated controls / sensors
Anti-coagulant of blood - Sodium citrate or similar	No	Readily degradable in water	Inside in plastic containers	Held inside
Engineering / maintenance - Paints, varnishes, solvents, greases & lubricants	Yes	May cause long-term adverse effects in the aquatic environment.	Flammable's store / general stores in engineering area	Held inside. Spill kits around site if spilt during use.

3.2 Spillage preparedness

The spillage prevention and response planning checklist must be used to plan for dealing with a spillage, review our risks and identify actions to be fully prepared for a spillage if it happens.

3.3 Spillage response planning checklist

Item	Yes, or no?	Comments
Has a delegated person(s) been appointed and trained to act as the incident response co-ordinator?	Yes	Senior Management Team
Is there a safe and secure location to use as an incident room in the event of a major spillage with communication and welfare facilities?	Yes	Numerous buildings
Are emergency response plans and key contact telephone numbers readily available?	Yes	See above
Is the site drainage plan up to date and readily available?	Yes	Attached
Is site drainage colour coded to match the site drainage plan and are shut off points clearly marked / signed?	No	Colour coding to be completed following site drainage survey.
Are there permanent physical protection measures around site borehole? or else devise temporary measures to deploy in event of spillage	Yes	Spill kits are located within close proximity.
Do we have readily available spill protection equipment to contain spills on site.	Yes	
Is there unrestricted access to drainage shut off points and or are there readily available keys and equipment?	Yes	At locations around site.
Are staff trained on spill response and safety procedures? Can staff work quickly and efficiently to protect the business in the event of a major spill?	Yes	Consider spill drills / exercises
Do we have emergency lighting to deploy if the water drainage channel / interceptors need to be blocked off during darkness?	Yes	Suggest ordering more torches to be stored in strategic locations throughout site.

3.4 Spill response

- **Never wash any spilt oil, chemicals, blood or other pollutants away into surface water drains or into the ground.**
- **Do not use detergents to clean up oil; you could cause a more serious pollution incident.**
- **Only biodegradable spillages are to be washed into internal effluent drains. This must be done in a controlled manner after consulting your supervisor and notifying the Effluent Treatment Plant Operative.**

It should be possible to soak up minor spills with a cloth or tissue if safe to do so and dispose of the material in an appropriate container for safe disposal.

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Spill kits are located around the site and contents list is shown on a laminated sheet with the kit.

If a spillage of hazardous liquid or other material that could pollute the environment occurs and it cannot be quickly soaked up, we must undertake the tasks below to protect the environment and attempt to contain the spillage on site. A copy of this list should be used to record the actions taken.

Tasks if spillage occurs

Task	
1.	Try to contain the spillage at source if safe to do so: • Make sure you are wearing all appropriate PPE for the hazardous material involved. • If a spillage occurs during delivery or collection of a liquid, shut off the transfer pump immediately and close any valves on the transfer line. • If a drum or container has been knocked over, try to turn it upright and refit the lid. • If a drum or container is punctured, try to turn the container or drum so the puncture is uppermost and secure it in this position. • Can the puncture be blocked using leak sealant putty? • Try to place the leaking container inside an over drum or other suitable, empty secondary container. • If it is not safe or possible to move the leaking container try to place a drip tray or other container beneath the area that is leaking to collect the spillage.
2.	If spillage cannot be contained at source, try to stop it close to the source: • If safe to do so, move the material that is spilling into another suitable container. • Access the nearest spill kit and use sorbent granules, sheets or pillows to soak up the spill and stop it spreading. • If you have a spill and pollution control equipment isn't readily available, you may be able to contain it using materials already on site like: - o fire hoses used as a boom; - o a shovel to spread sand, saw dust or earth onto small spillages - o a car foot well mat or a sheet of polythene, weighed down with sand or earth as a drain seal. - o sand bags can be used to channel substances to a collection point or to block off drains.
3.	If spillage cannot be contained close to source contain it on the surface: • Identify and address any nearby hazards that the spill could affect: - o Spills of flammable materials could catch fire? - o Is the spill heading toward any drains or unsurfaced ground? - o Warn nearby workers who could be exposed to the hazardous material spilt. • If safe to do so, attempt to stop the material getting into the drainage system or onto any unsurfaced ground. • Access the spill kit and use sorbent booms to divert or contain spills on hard surfaces. • Fit a drain mat or seal over nearby drain(s) or gullies or alternatively spread a circle of sand around a drain to prevent the spillage entering it.
4.	If spillage cannot be contained on the surface, contain it in the drainage: • If the spillage is on the yard areas, close the shut off valve(s) on the oil interceptors to block off the drainage leading into outlets (W2 and or W3) depending on the location of the spill. These shut off points are marked on the site drainage plan. The outlets are shut off by closing the drainage valves which are accessed by lifting the manhole cover. Manhole keys are kept in the ETP monitoring cabin and in the gatehouse. • If there's a builder's drain bung or sand bags available, try to install in the drainage system at a suitable point close to and downstream of the spill. Consider the health and safety of the person installing or removing a drainage blocker to make sure they aren't exposed to any hazardous conditions or materials. • If the spill is around the effluent treatment plant it will flow towards the low point at the rear of the site by the gateway down to the river and into the small catchment pit. If safe to do so, close off the outlet from the pit and deploy a pump and flexible pipework to pump back from the pit to the effluent treatment plant divert tank or other holding area. • If the spill is in an area that drains to the effluent treatment plant, alert the effluent treatment plant operative to warn that a spillage has occurred and advise them to divert incoming effluent to the divert tank.
5.	If spillage cannot be contained on site:

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If the spillage is too big for you to deal with on your own or you are uncertain how to deal with it inform your supervisor or manager immediately for further advice.

The following actions should then be taken:

- Contact the organisations listed in the Emergency Response Plan as necessary, without delay to notify them of the incident.
- Check the surface water drainage channel upstream of where it joins the river for signs of contamination. The surface water channel can be accessed via the gate at the rear of the effluent treatment plant (ETP) area. A key to the gate is held in the ETP monitoring cabin and in the gatehouse. See the Site Drainage Plan
- Deploy a response team if safe to do so to. If oil has been spilt it may be possible to deploy an oil absorbent boom on the surface water channel. A stock of equipment to use is held at the ETP such as stakes, oil booms and oil absorbents.

5. Once the spill is contained safely clear it up

- Determine how the contamination will be removed. Undertake an environmental risk assessment if this is not straightforward.
- Tankers, pumps, flexible hoses and empty containers / IBC's may be required and lighting may need to be brought in where the water drainage channel has been blocked off.
- Specialist clean up contractors may be required if this is beyond the capabilities of in-house staff and facilities available – see contacts list in the Emergency Response Plan for details of specialist advice.
- Wear appropriate PPE.
- Transfer the spill into a suitable portable temporary storage container, where it can be held safely awaiting removal.
- Remove used granules / absorbed liquids into a marked secure container using a brush and shovel.
- All the waste must be disposed of according to the Waste Duty of Care and may be hazardous waste if soaked in oil or chemicals.
- Ensure persons handling and collecting waste are aware of the hazards and use appropriate PPE.
- If the drainage system has been contaminated residual contamination may need to be flushed out in a controlled manner, collected and treated / disposed of. Specialist contractors should be brought in to undertake this work.

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4 Ammonia gas leak

Introduction

Maelor Foods Ammonia Emergency Response Plan (AERP) is designed to prepare the business for an emergency situation relating to an ammonia release. The AERP is an essential component to Maelor Foods overall safety program. The AERP states Maelor Foods policy for responding ammonia emergencies.

This policy outlines the minimum requirements for Maelor Foods Ammonia Emergency Response Plan. The sites health and safety manager and engineering manager must develop a plan that applies these requirements to the ammonia-refrigeration within the Wrexham site.

The plan will include identifying the responsibilities for specific employees who may participate in an emergency response. It is the policy of Maelor Foods to participate with local responding emergency services in an emergency response rather than have an entire trained emergency response team onsite.

Statement of Policy

It is Maelor Foods policy to implement the requirements of this Ammonia Emergency Response Plan (AERP) by managing and operating the Wrexham ammonia refrigerated poultry facility in accordance with the associated Regulations and general good operating practices.

The objective is to minimize the risk to employees, the community, the integrity of customer's products and company reputation during an emergency. All employees are expected to cooperate as directed by the emergency response management to assure successful resolution of the emergency.

Refer to **Ammonia Emergency Response Plan**

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