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	Position	Name	Signature
Created by:	Consultant MENEX EOOD	Hristo Menzilev	
Validated by:	Director ENVEO ASTON Ltd.	Yoanna Devaney	

1. Introduction

This document describes the preventative measures that will be implemented on site to minimise the risk of accidents and incidents that have the potential to cause an impact on the environment. This document also outlines the actions that will be taken if such an incident should occur.

The Accidents Management Plan must be read in conjunction with the site’s Environmental Risk Assessment.

2. Training

All staff are trained in all aspects of the EMS, including potential accidents, response, and mitigation measures. Training is completed in accordance with **EA-P 01 Environmental training**.

3. Potential accidents:

- Leaks or spillages.
- Failure of equipment - leakages/puncture due to faulty pipeline, valves, over-pressure, corrosion.
- Fire.
- Unauthorised entry and tampering or malicious damage to equipment.
- Other extreme weather events such as heat waves, strong winds, snow or extreme cold

3.1. Leaks or spillages

3.1.1. The environmental impact of leaks or spillages is the contamination/pollution of land, drains, groundwater, and watercourses. It is considered that the likelihood of leaks or spillage to cause environmental harm is low.

3.1.2. Two tank containers with a total capacity of 48 tons are located on site. They will be used to store waste oils. The likelihood of leakage or spillage as well as preventative measures have been considered:

- It is considered that the likelihood of spillage is low due to secure storage in the metal tank containers, which are designed to store dangerous goods/wastes. The staff operating them are trained.
- It is considered that the likelihood of spillage during loading/unloading operations is low due to the planned preventative maintenance and regular checks completed to ensure that damage/corrosion would not cause leakage, requirement for a drip tray to be used and staff training.

- It is considered that the likelihood of leakage is low due to the secure tank container being situated inside a bund and planned preventative maintenance and regular checks completed to ensure that damage/corrosion would not cause leakage.
- 3.1.3. Appropriate storage of waste oils reduces the likelihood of leaks or spillages. The staff apply **EA-P 08 Waste oil storage procedure** and the guidance in the following documents is applied: *Guidance for Pollution Prevention: Above ground oil storage tanks: GPP 2, Guidance for Pollution Prevention: Safe storage and disposal of used oils: GPP 8.*
- 3.1.4. Loading/unloading operations are controlled which reduces the likelihood of leaks or spillages, see **EA-I 05 Instruction for actions when loading/unloading waste oil.**
- 3.1.5. Staff will implement **EA-I 16 Instruction for actions in the event of spillage.**

- 3.2. Failure of equipment**
- 3.2.1. The potential environmental impact of equipment failure is the contamination/pollution of land, drains, groundwater, and watercourses from the release of waste oil.
- 3.2.2. The waste operation implemented on site consists of secure storage tank containers, pump, pipelines and oil-water separator. It is considered that the likelihood of failure of this equipment to cause environmental harm is low.
- 3.2.3. It is considered that the likelihood of equipment failure is low due to the following preventative measures:
 - Pre-use checks completed by staff prior to use to check for indicative features (e.g., leaks, electrical failure, increased noise, and vibration).
 - Planned preventative maintenance and servicing as per manufacturer guidelines.
 - Only trained staff using equipment
- 3.2.4. In the event of equipment failure, actions outlined in **EA-I 17 Instruction for actions in the event of failure of equipment** should be followed to mitigate environmental impacts.
- 3.2.5. If the failure has resulted in a leak or spillage, staff will take action in accordance with **EA-I 16 Instruction for actions in the event of spillage.** This will reduce the environmental impact of the spill.

- 3.3. Fire**
- 3.3.1. The environmental impact of fire is air pollution (from the emission of smoke and particulates) and generation of firewater which can contaminate/pollute land, drains, groundwater, and watercourses. The environmental impact of fire is likely to be high.
- 3.3.2. It is considered that the likelihood of onsite fires is low as the flash point of the waste oils is typically between 180°-200°C and they are not explosive. The likelihood of fires is low due to the preventative measures implemented on site:



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- Non-conforming wastes are rejected from site, see *EA-P 07 Waste oil rejection procedure*.
 - Implementation and maintenance of site security measures will minimise the risk from arson and vandalism.
 - There is a no smoking policy on site.
 - Maintenance on equipment, including checking for accumulation of dust, debris, grease, and oil.
- 3.3.3. In the event of a fire, measures are implemented to mitigate its environmental impact, see *EA-I 18 Instruction for actions in the event of fire*.
- 3.3.4. In order to identify a fire and initiate a response, see *EA-I 18 Instruction for actions in the event of fire*.
- 3.3.5. Waste storage and handling is controlled to minimise its environmental impact, see *EA-P 08 Waste oil storage procedure*.
- 3.3.6. Staff is trained to ensure quick fire suppression and minimise environmental impact, see *EA-I 18 Instruction for actions in the event of fire*.
- 3.3.7. The Site will use inert materials as a fire suppressant which minimises the generation of firewater, see *EA-I 18 Instruction for actions in the event of fire*.
- 3.3.8. Site operations have been designed to facilitate access for emergency services. This allows for the Fire Service to deploy equipment quicker in suppressing fires, thus minimising the risk of air pollution.
- 3.4. Unauthorised entry**
- 3.4.1. The environmental impact of unauthorised entry is dependent on the activities completed by the trespasser – this can include arson and malicious damage to equipment. Environmental impacts can include air pollution and firewater generation from fighting fires and the contamination/pollution of land, drains, groundwater, and watercourses.
- 3.4.2. The likelihood of unauthorised entry as well as preventative measures have been considered:
- It is considered that the likelihood of unauthorised access is low due to the location of the site being inside Hawarden Industrial Estate which implements its own security measures.
 - It is considered that the likelihood of unauthorised access is low due to the implementation of security measures, see document *EA-SSP Site Security*.
- 3.4.3. Appropriate storage of fuels and oils reduces the likelihood of spillage during unauthorised access, see *EA-P 08 Waste oil storage procedure*.
- 3.5. Other extreme weather events**
- 3.5.1. The potential environmental impact of heat waves, strong winds, snow or extreme cold is the contamination/pollution of land, drains, groundwater, and



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watercourses from the release of waste oil. It is considered that the likelihood of these events to cause environmental harm is low.

3.5.2. The likelihood of heat waves, strong winds, snow or extreme cold have been considered:

- The likelihood of heat waves is low, although slightly increasing in recent years. Neither the waste operation on site nor the environment would be impacted. The waste oil stored has a flash point between 180°-200°C and no explosive nature.
- The likelihood of strong winds is considered low to medium. They can generally cause infrastructure damage but would not affect the waste operation on site nor the environment. The waste oil is stored in tank containers weighting more that 4500 kg which are securely attached to the ground. There are no tall structures on site.
- The likelihood of snow and/or extreme cold is considered low to medium. These events can result in accumulation of ice on the pipelines which can lead to deformation and/or disruptions. To prevent these, *EA-I 01 Instruction for operation and maintenance of equipment* is applied by staff members. In case of occurrence, *EA-I 17 Instruction for actions in the event of failure of equipment* should be followed to mitigate environmental impacts.