

# ACCIDENT MANAGEMENT PLAN

Environmental and sustainability solutions provided to  
**BRYN RECYCLING LIMITED**

WRM-LTD.CO.UK



This report was prepared by Walker Resource Management Ltd (WRM) within the terms of its engagement and in direct response to a scope of services. This report is strictly limited to the purpose and the facts and matters stated in it and does not apply directly or indirectly and must not be used for any other application, purpose, use or matter. In preparing the report, WRM may have relied upon information provided to it at the time by other parties. WRM accepts no responsibility as to the accuracy or completeness of information provided by those parties at the time of preparing the report. The report does not take into account any changes in information that may have occurred since the publication of the report. If the information relied upon is subsequently determined to be false, inaccurate, or incomplete then it is possible that the observations and conclusions expressed in the report may have changed. WRM does not warrant the contents of this report and shall not assume any responsibility or liability for loss whatsoever to any third party caused by, related to, or arising out of any use or reliance on the report howsoever. No part of this report, its attachments or appendices may be reproduced by any process without the written consent of WRM. All enquiries should be directed to WRM.

Document Title	Accident Management Plan
Client	Bryn Recycling Limited
Revision	v1.0
Date	24/08/2023
Document Reference	BRY-B06
Project Reference	1213/J05
Author: Joseph Epicheff	Reviewer: Martin Ropka
	

### Copyright ©

All material on these pages, including without limitation text, logos, icons and photographs, is copyright material of Walker Resource Management Ltd (WRM). Use of this material may only be made with the express, prior, written permission of WRM. This document was produced solely for use by the named client to whom the document refers. The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of WRM. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests.

## REVISION LOG

Revision	Details	Date
0.1	First draft	26/04/2023
0.2	Internal review	28/04/2023
0.3	Further draft following client review	08/06/2023
1.0	First issue	24/08/2023

## CONTENTS

<b>1.0</b>	<b>EMERGENCY</b> .....	<b>1</b>
1.1	Site Location Details .....	1
1.2	Emergency Contacts.....	1
1.3	Out of Office .....	1
<b>2.0</b>	<b>ACCIDENT MANAGEMENT PLAN</b> .....	<b>2</b>
2.1	Identified hazards .....	2
2.2	Assessment of the Risks .....	3
2.3	Risk Mitigation Measures .....	7
2.4	Implementation .....	17
2.5	Fugitive Releases .....	17

## 1.0 EMERGENCY

### 1.1 Site Location Details

Company: Bryn Recycling Ltd  
Access via: Gelliargwellt Farm  
Office Phone: 01443 838 121  
Site Mobile Phone: TBC  
Site Grid Reference:

### 1.2 Emergency Contacts

Emergency Services:	999
Local Police:	101
Environment Agency Hotline:	0800 807 060
Health and Safety Executive:	0345 300 9923
Electricity Supplier:	N/A
Local Authority:	CCBC: 01433 815 588
Gas Supplier:	N/A
Sewerage Undertaker:	N/A
Fuel Supplier:	N/A

### 1.3 Out of Office

Site Manager: Jennifer Price	07507 195517
Company Director: Paul Price	07815 207693
Managing Director: Alun Price	07811 340769
Nightwatchman	07850 205079

## 2.0 ACCIDENT MANAGEMENT PLAN

Development of this Accident Management Plan has been made in line with the requirements set out in Section 2.8 of S5.06. For accident management, there are three particular components:

- Identification of the hazards posed by the installation/activity;
- Assessment of the risks (hazard x probability) of accidents and their possible consequences; and,
- Implementation of measures to reduce the risks of accidents, and contingency plans for any accidents that do occur.

### 2.1 Identified hazards

The following hazards have been identified for the proposed facility requiring assessment and management:

- Inadequate waste acceptance procedures;
- Fires arising from storage of fuel;
- Fuel leak from vehicles;
- Failure of site infrastructure;
- Site security failures/vandalism/arson;
- Fugitive emissions (Noise, Pests, Odour, Mud, Debris);
- Pest management; and,
- Mud & debris.

## 2.2 Assessment of the Risks

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
Inadequate waste acceptance procedures.	Rare - pre-acceptance procedures in place.	Acceptance of non-permitted waste.	Potentially odorous, or unsuitable waste entering waste treatment process.	Damage to human health, local environment and infrastructure.	Low probability of event due to well-established acceptance procedures.
Fires arising from storage of fuels.	Extremely rare – appropriately stored fuel and limited sources of ignition.	Toxic and polluting smoke from fuel storage area.  Water used to extinguish a fire could be harmful to the surrounding environment if it isn't contained within the site.	Aerial dispersion of smoke to local residents depending on wind direction.  Potential risk of a fire spreading to the surrounding environment.  Environmental damage from fire water runoff causing land contamination.	Risk to life of site operatives.  Closure of the site for a potentially significant period.  Contamination of land.  Destruction of habitat if the fire was to spread beyond the site.	Low probability of event with high potential consequence.

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
				Potential respiratory harm from toxic smoke, which may result in death.	
Fuel leak from vehicles.	Rare - Spill kits and drip trays are available at the point of use.  Pre-use checks are undertaken on all vehicles which would identify any potential fuel leaks.	Potentially polluting liquids flow onto permeable surface area of facility.  Potential risk of fire if a naked flame is present.  Increase risk of slips or vehicles skidding on the spilled fuel if there is a large quantity.  Potential handling hazards if PPE and COSHH risk	Spillage of fuel onto areas of the site with potential to cause land contamination.  Potential for fire water runoff and smoke emission in worst case scenario.	Potential slip and trip hazards making the area hazardous for site traffic and pedestrians.  Potential fire hazard if a naked flame is present, which may have damaging environmental impacts from fire runoff water and emissions.  Potential for land contamination if not constrained.	Low probability of event with low potential consequence due to robust control measures.

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
		assessment for the substance is not followed.		Potential harm to operatives cleaning the spill if the appropriate COSHH risk assessment is not consulted.	
Failure of site infrastructure.	Rare – infrastructure regularly maintained.	Damage of pipework and corrosion of components.	Infiltration to groundwater beneath the site.	Failure of site infrastructure could result in contamination of surface and groundwater with the potential for ecological harm.	Low probability of event with a high potential consequence.
Site security failures / vandalism/arson.	Rare – site is remote with entrance gate and perimeter fencing. No history of vandalism on site.	Damage to infrastructure and arson.	As per predictions of failure of site infrastructure.	As per consequences of failure of site infrastructure.	Low risk given no history of vandalism on site.

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
Impact of fugitive releases leaving site.	Medium – potential risk of odour, noise, vibration, or dust being noticed beyond the site boundary. See Fugitive Emissions Management Plan.	Noise, vibration, odour and dust acting as a nuisance to local residents.  Deposition of dust in surrounding area.	Aerial dispersion of noise, vibration, odour and dust depending on wind strength and direction.	Potential for harm to sensitive receptor from prolonged exposure.	Low risk given the procedures that manage fugitive releases and mitigation measures in place.
Pest management	Rare - pests could be found at the site although the type of wastes accepted reduces the likelihood of this.	Vermin such as rats carry diseases which may be harmful to animal and human health and an increase in population may be detrimental to the surrounding habitat.	Potential spread of pests to surrounding area.	Creates a nuisance and potential harm to human/animal health and environmental quality.	Low risk- could occur, however consequences are limited and chances of occurring are reduced by good housekeeping and pest control, if required. This would mitigate against the risk.
Mud & debris.	Rare - site kept clean & tidy.	Site roadways and highway network polluted with mud & debris.	Mud & debris deposited from dirty vehicles onto site roadways and highway network.	The consequences of mud on the highway could be harm to pedestrians or road users from an	Low probability of event due to good housekeeping.

Hazard	Source Frequency	Risk Evaluation	Emission Prediction	Consequences	Risk
				accident, resulting from the deterioration in the road surface.	

### 2.3 Risk Mitigation Measures

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
Inadequate waste acceptance procedures.	N/A.	All incoming loads will be weighed, and the correct waste acceptance procedure undertaken.  Records of received wastes will be made and retained.	Site Manager  NRW (if leading to pollution event).	A confirmatory check will be undertaken at the offload area.  Additional detailed visual check is undertaken at the corresponding waste reception area.	Any non-conforming wastes identified following deposit will be removed and placed in a quarantine area pending removal from the site back to the supplier or to a suitable permitted facility.	OP02 - Waste Acceptance Procedure.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
		<p>Documentation in accordance with the Duty of Care Regulations will be completed.</p> <p>Site operatives will be made aware of the permitted waste types.</p>			<p>A record will be made of wastes found not be permitted.</p> <p>Waste rejection procedure in place at site.</p>	
Fires arising from storage of fuel and waste.	<p>Process machinery such as telehandler.</p> <p>Fuel storage areas.</p> <p>Staff areas including the welfare van.</p>	<p>Regular maintenance of all vehicles.</p> <p>No ignition sources are permitted near fuel storage areas.</p> <p>Fuel is stored in a bunded storage tank.</p>	<p>Fire Brigade- In the event of a fire.</p> <p>HSE- In the event of a serious incident.</p> <p>NRW- following a fire event.</p>	<p>Maintenance of vehicles follow strict procedure.</p> <p>Operators trained in accordance with the on-site fire procedure.</p> <p>Site checks ensuring fire extinguishers are</p>	<p>Raise alarm on site.</p> <p>Ensure personnel evacuated and accounted for away from danger area.</p> <p>If possible to do so safely, switch off all electricity/fuel supplies.</p> <p>Ensure all staff are alerted.</p>	<p>Management System</p> <p>Accident Management Plan.</p> <p>Fire Procedure.</p>

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
	Waste reception and storage areas.	<p>Flammable substances are stored in minimum quantities required.</p> <p>Fire extinguishers are located across the site and serviced annually.</p> <p>Fire procedure is enforced across site and implemented by site staff.</p> <p>Visitors to the site are required to sign in at the site office.</p>		<p>positioned in the correct location, fire exits are not blocked and flammable material is not stored in inappropriate locations.</p> <p>Fire risk assessment carried out for the facility.</p>	<p>Call fire service and other emergency services as required.</p> <p>Inform site management.</p> <p>Post member of staff at site entrance to direct emergency services.</p> <p>Liaise with and follow instructions of emergency team, making them aware of any hazards on site.</p> <p>Prevent fire waters causing pollution on site.</p> <p>Depending on the severity of the fire, site critical equipment may have been damaged and no further</p>	Site manager to co-ordinate.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
					<p>reception or processing of waste would be undertaken until agreed with the NRW.</p> <p>If equipment will be inoperable for extended periods of time, consideration will be given to the removal of material from site until repairs are effectuated.</p> <p>Record incident.</p>	
<p>Fuel leak from fuel tank or vehicles.</p>	<p>Fuel storage tank &amp; plant equipment and machinery.</p>	<p>Bunded fuel tank used to reduce the likelihood of leaks or puncturing of the tanks.</p> <p>Fuel tank is located away from the main processing areas to</p>	<p>Site Manager- After any significant spillage has occurred.</p> <p>NRW-In the event of a</p>	<p>The condition of the tank is frequently inspected as part of the standard site checks.</p> <p>Pre-Use checks are undertaken on machinery prior to</p>	<p>Spill kits are available at the point of use and will be used to contain any spillages and cover drains.</p> <p>Ensure machinery is switched off.</p>	<p>Accident Management Plan.</p> <p>Drainage Management Plan.</p>

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
		<p>minimise the risk of being punctured by a vehicle collision.</p> <p>Spill kits are in place at the point of use.</p> <p>Tank is locked when not in use.</p> <p>Hazard warning signs are located the fuel tank.</p> <p>Vehicles are stored on concrete surfacing where possible when not in use and kept in an open space</p>	<p>pollution incident.</p> <p>Fire Service- In the event on a fire.</p>	<p>use to detect any mechanical faults which may result in fuel leaks.</p> <p>Toolbox Talks are held with staff to ensure everyone is familiar with the refuelling and spillage procedure.</p> <p>Site Manager periodically observes the refuelling process to ensure safe practices are followed.</p>	<p>Restrict access to area whilst spill is being dealt with.</p> <p>Refer to the COSHH risk assessment for the safe handling on the spilled material.</p> <p>Monitor external areas to ensure no further contamination.</p> <p>Record and investigate incidents following Management System.</p> <p>Review Management System within the context of a management review.</p>	

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
		away from buildings/coverings  Vehicles and machinery are pro-actively maintained to ensure they are in a safe operating condition.			Inform the NRW of any significant spillages and the fire service if required.	
Breach of secondary site containment.	Fuel storage tank.  Rainwater storage tank.	Regular inspection of tanks to review integrity.	NRW - Emergency event.	Site checks.	Inform Site Manager upon detection of breach.  Try to contain liquids, where possible, within bunds.	Management System.  Accident Management Plan.
Failure of Site Infrastructure	Pipework.  Energy-using equipment.  Weighbridge.	Infrastructure regularly checked with maintenance programmes.	Site Manager  NRW – Inform of any impact on the process.	Routine daily inspections of site integrity.	Inform Site Manager upon detection.  Arrange for remedial works to be carried out immediately.	Management System.  Accident Management Plan.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
					<p>Inform the NRW of failure and proposed timescale to repair.</p> <p>Remove any waste materials from area affected by failure. Export waste materials if no on-site space available.</p> <p>Depending on the severity of the failure and timescale to repair, reception of material would not be undertaken until agreed with the NRW.</p>	<p>Maintenance Schedules.</p> <p>Site Diary.</p> <p>Site manager to coordinate.</p>
Site security failures/ vandalism/ arson.	All.	Security measures in place to prevent unauthorised access.	Police. NRW (if break-in leads to pollution incident).	Daily lock up at end of each working day.	<p>Assess damage and mitigate any damage / pollution caused (follow management practices).</p> <p>Inform site management.</p>	<p>Management System.</p> <p>Management System</p>

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
		<p>CCTV covering key areas of site.</p> <p>Night security conduct hourly site patrols and inspections.</p> <p>Fence around the perimeter of the site.</p> <p>Locked gate at site entrance.</p> <p>Warning signs around perimeter.</p>			<p>Inform Police.</p> <p>Inform NRW if required.</p> <p>Record Incident.</p>	<p>Accident Management Plan.</p> <p>Site Diary.</p> <p>Site Manager to co-ordinate.</p>
Impact of fugitive releases leaving site.	N/A	Dust suppression available when levels are high.	<p>NRW.</p> <p>Local sensitive receptors.</p>	Daily / weekly site checks.	<p>Dust suppression to reduce risk of further release.</p> <p>In extreme cases cease operation of vehicle or</p>	Fugitive Emissions Management Plan.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
		Regularly maintained equipment to ensure correct operation.			equipment until problem identified and fixed.	Accident Management Plan.  Site Manager to co-ordinate.
Pest Management.	N/A	It is considered that the nature of the waste results in the risk of pest infestation being low.	NRW.  Pest Control.	On-going waste inspections for identification of infestation.	On detection of pests, insects or vermin, an appropriate professional pest/vermin control contractor will be employed.	Fugitive Emissions Management Plan.  Pest control measures in place.
Mud & Debris	N/A	The site will be kept clean and tidy in all areas.	Site Manager.	Daily visual checks on all areas of site access tracks and of public road at site entrance.	Should it become apparent that debris and/or mud has been tracked onto the public highway from this activity, then sweeping of the relevant areas, including the public	Management System.  Fugitive Emissions Management Plan.

Hazard	Equipment at Risk	Preventative Measures	Who to Inform	Monitoring Mitigation	Response Measures	System Procedures
					highway, will be undertaken as soon as practicable.	Site Manager to co-ordinate.

## 2.4 Implementation

The site has implemented a full Accident Management Plan detailing potential accident and emergency situations that could occur on site, control measures to minimise potential occurrence and procedures to be followed should accidents occur on site.

## 2.5 Fugitive Releases

The site has a full Fugitive Emissions Management Plan (BRY-B04) reviewed on an annual basis, or as necessary, as identified by the processes installed within the Management Plan.