

**Report 6  
Summary Accident  
Management Plan**

**SSQ MATERIALS  
RECYCLING FACILITY  
LLANWERN**

*Report Number 2473r6v1d0925*

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**September 2025**

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Figure 1-1 Position of SSQ east of Newport

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Version	Issue	Notes
V1	September 2025	Permit application

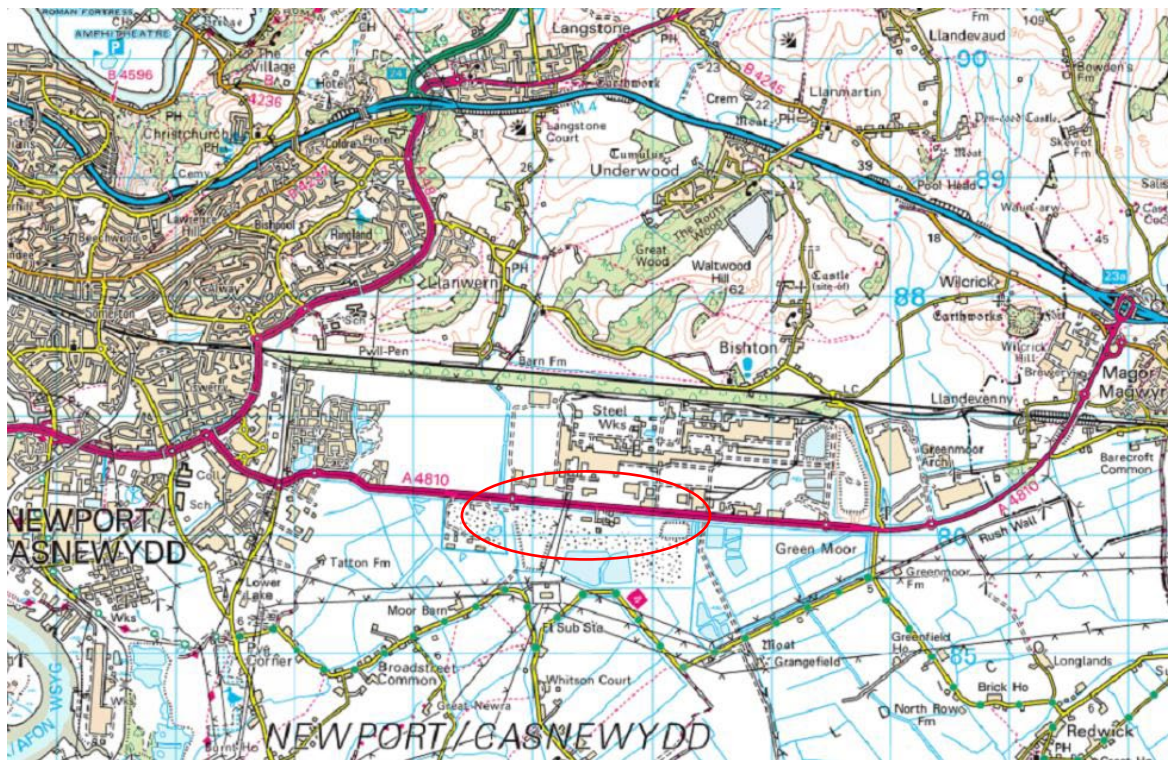
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# 1 BACKGROUND

Geotechnology has been commissioned by Darlow Lloyd and Sons Ltd (DLS) to prepare a bespoke Permit application for submission to Natural Resources Wales (NRW) for a proposed waste materials recycling facility located to the East of Newport at Llanwern. The area is referred to as South Side Queensway (SSQ) as it is to the south of the A4810 Queensway. The details of the application are summarised in Table 1-1 and the site location is shown on Figure 1-1.

**Table 1-1 Application Details**

<b>Name of the Applicant</b>	Darlow Lloyd and Sons Ltd (DLS)
<b>Activity Address</b>	Queensway, Newport. NP19 4QX
<b>National Grid Reference</b>	Area1_5: E336686 N186114 Area2_10: E336941 N186171 Area3_26: E337863 N185779



**Figure 1-1 Position of SSQ east of Newport**

## 1.1 Context of Proposed Activities

The proposals would enable DLS to receive and process waste on hardstanding to enable recovery and recycling.

The operation is permitted under a Permit issued by the waste regulator Natural Resources Wales (NRW). One of the conditions of holding such a Permit is that a written environmental management system (EMS) must be in place. As part of this EMS, this EAMP sets out how DLS will deal with any incidents or events that could result in:

- 
- Pollution or
  - Breach of Permit

## **1.2 Scope of EAMP**

An Environmental Management System (EMS) is a structured system which, once implemented, helps an organisation to identify the environmental impacts resulting from its business activities. It also helps manage and reduce those impacts, so that the environmental performance of the organisation is improved. An EMS should provide a methodical approach to planning, implementing and reviewing an organisation's environmental management during normal and abnormal conditions. For this reason the EMS is informed by an Environmental Risk Assessment (ERA) and this EAMP. This document should therefore be used alongside all of the other aspects of the EMS and Management Plans.

This plan identifies foreseeable potential accidents and evaluates the likelihood and consequences of the accident happening. This allows the overall risk to be identified. Based on these assessments, the plan then sets out the measures DLS will integrate to the EMS and day-to-day operation to avoid the accident happening in the first instance and the magnitude of any impact should the accident occur. Implementation of the EAMP will require adherence to and completion of a series of procedures and forms integrated to the documented management system.

## 2 METHODOLOGY

The assessment is based on identifying plausible risks through the use of a tabulated conceptual model based upon the conventional source (hazard)–pathway–receptor model. The approach enables the pathways via which human, environmental and infrastructure receptors may be exposed to hazards during an accident. If one element of the source – pathway – model does not exist there is no risk. If a pathway exists that potentially links the hazard to the receptor, then there is a risk that requires evaluation, management and potentially mitigation.

For each plausible exposure pathway identified, the probability and consequence of the event occurring has been qualitatively evaluated. The overall magnitude of risk associated with an exposure pathway is the product of the probability and the consequence associated with the event. Therefore, the overall magnitude of risk can be summarised as follows:

$$\text{Magnitude of Risk} = \text{Probability} \times \text{Consequence}$$

In order to assess each pathway, the magnitude of the consequence (i.e. severity) and the magnitude of the probability (i.e. likelihood) has been determined. To ensure this process is transparent and repeatable the terms used to define the magnitude of the consequence and probability is defined in Table 2-1 and Table 2-2.

**Table 2-1 Classification of Consequence**

Classification	Definition
<b>Severe</b>	Equivalent to Category 1 Pollution Incident.  Major, serious, persistent and/or extensive impact or effect on the environment, people and/or property.
<b>Medium</b>	Equivalent to Category 2 pollution incident.  Significant impact or effect on the environment, people and/or property.
<b>Mild</b>	Equivalent to Category 3 pollution incident.  Minor or minimal impact or effect on the environment, people and/or property.
<b>Minor</b>	No measurable effect on humans. Equivalent to insubstantial pollution incident. with no impact.
<b>Uncertain</b>	Further assessment potentially required to evaluate exposure pathway.

**Table 2-2 Classification of Probability (Likelihood)**

Category	Definition
<b>High</b>	There is pollutant linkage and an event would appear very likely in the short-term and almost inevitable over the long-term, or there is evidence at the receptor of harm or pollution.
<b>Medium</b>	There is pollutant linkage and all the elements are present and in the right place which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short-term and likely over the long-term.
<b>Low</b>	There is pollutant linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a long period such an event would take place and is less likely in the shorter term.
<b>Very Low</b>	There is pollutant linkage but circumstances are such that it is improbable that an event would occur even in the very long-term.
<b>Uncertain</b>	Further assessment potentially required to evaluate exposure pathway.

For each exposure pathway the overall magnitude of risk is defined by the product of the probability and consequence as shown in Table 2-3. The risk categories are defined in Table 2-4.

**Table 2-3 Classification of Risk**

		CONSEQUENCE			
		Severe	Medium	Mild	Minor
PROBABILITY	High	Very high risk	High risk	Moderate risk	Low risk
	Medium	High risk	Moderate risk	Low risk	Low risk
	Low	Moderate risk	Low risk	Very Low risk	Very low risk
	Very Low	Low risk	Very Low risk	Very low risk	Very low risk

**Table 2-4 Description of Risk Classes**

<i>Very high risk</i>	There is a high probability that severe harm could arise to a designated receptor from an identified hazard at the site without further intervention.
<i>High risk</i>	Harm is likely to arise to a designated receptor from an identified hazard at the site without further mitigation.
<i>Moderate risk</i>	It is possible that harm could arise to a designated receptor from an identified hazard. However, it is either relatively unlikely that any such harm would be severe, and if any harm were to occur it is more likely, that the harm would be relatively mild.
<i>Low risk</i>	It is possible that harm could arise to a designated receptor from identified hazard, but it is likely at worst, that this harm if realised would normally be mild
<i>Very low risk</i>	It is a low possibility that harm could arise to a designated receptor, but it is likely at worst, that this harm if realised would normally be temporary mild or minor.
<i>No potential risk</i>	There is no potential risk if no pollution linkage has been established.

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## **3 ASSESSMENT OF FORESEEABLE ACCIDENTS**

### **3.1 Evaluation of Current Risk Profile**

Accidents, incidents and their consequences are not always foreseeable. For this reason, the EAMP will be subject to annual review and internal audit in line with the EMS documentation. At this stage the events evaluated are tabulated in the matrix presented in Table 3-1. This will need to be reviewed following any accidents or incidents that either cause pollution, lead to breach of the Permit or result in a 'near miss within this context.

Taking into account the mitigation measures to be implemented the current assessment indicates that even under abnormal conditions there should not be any significant environmental impacts or Permit breaches from the accidents evaluated. This is because the site layout, Management Plans and procedures are aimed at ensuring that the operation does not pose an unacceptable risk to the environment and that the operation is undertaken in accordance with the Permit. Some of the key measures to be implemented are discussed further below.

### **3.2 Site Layout**

The site layout provides sufficient space with clear external lines of sight for vehicles to safely enter and leave the working area. This minimises the risk of collision and contact between vehicles, human and infrastructure. Any new drivers are inducted and each load delivered is monitored by a trained banksman.

The site layout will separate different wastes. With the maximum storage capacity of each area detailed within the Working Plan this minimises the opportunity for large stockpiles developing which helps ensure compliance with Permit conditions. Although the waste to be treated is largely mineral and not flammable, dedicated quarantine areas are also provided, either as open spaces away from other wastes or within mobile empty skips available in all site areas.

There are no drains on site.

Fuel will be delivered as required.

**Table 3-1 Accident Risk Evaluation Matrix**

Source	Pathway	Receptor	Mitigation Measures	Risk Evaluation		
				Likelihood ranking	Consequence ranking	Overall Risk
Vehicle collision/failure	Leakage of fuels/oils	Land, groundwater and/or surface water	All plant/vehicles subject to preventative maintenance. Traffic management aimed at circular routes and one-way systems. Spill kits available on site and in vehicles. Daily checks to ensure all areas free of loose debris. See spill procedure.	Low	Medium	Low
	Physical impact/damage	Infrastructure and property		Low	Medium	Low
	Fire	Environment, humans, infrastructure		Low	Medium	Low
Receipt of non-conforming waste or hidden contraries	Reaction leading to fire/waste stream contamination	Environment, humans, infrastructure	Pre-acceptance and acceptance procedures in place. Personnel trained to spot and manage contraries.	Low	Medium	Low
Storage failure	Collapse of storage/escape of waste	Environment, humans, infrastructure	All infrastructure subject to preventative maintenance and inspection.	Low	Mild	Very Low
Excess waste on site	Escape of waste and change to risk profile	Environment, humans, infrastructure	Weighbridge allows waste mass to be measured. Dedicated storage areas limit waste storage. Quarantine always available.	Low	Medium	Low
Power failure/plant shutdown	End of processing	Site operations and potentially customers	Quarantine capacity always available. Site would be temporarily closed.	Low	Medium	Low
Extreme weather	Extreme temperature/wind/rainfall	Environment, humans, infrastructure	Site would be temporarily closed/ activities limited depending upon conditions.	Medium	Medium	Moderate
Operator error/equipment failure	Build-up of untreated waste and change to fire risk profile	Site operations and potentially customers	All personnel trained and Preventative Maintenance programme in place. Quarantine capacity always available.	Low	Mild	Low
Flooding	Rising water levels/poor drainage leading to localised inundation	Humans and infrastructure on site	Site is in an area at risk of flooding. As only non-hazardous waste to be processed any waste washed off site will add to the volume of the local post-clean-up workload, rather than the hazard. Much of the material already present at SSQ. No significant change to risk profile.	Low	Medium	Low
	Washing of waste off-site	Environment		Low	Medium	Low
Trespassing / Vandalism	Arson causing fire/spillage	Environment, humans and infrastructure	Security fence and SSQ is ultimately within the land holding of Tata and subject to 24hr manned security. Spill kits available.	Low	Medium	Low
Fire	Fire damage, release of airborne pollution and fire water run-off	Environment, humans and infrastructure		Low	Medium	Low
Spillage, leakage or loss of containment	Leakage of polluting fluids and infiltration to land	Land, groundwater and/or surface water	As above. Most waste dry and already present at SSQ. Emergency procedures in place. Spill kits available.	Very Low	Low	Low

Source	Pathway	Receptor		Risk Evaluation		
What could go wrong?		Who/what could be impacted	Mitigation Measures	Likelihood ranking	Consequence ranking	Overall Risk
Infestation	Pests leading to nuisance (on-site and off-site)	Environment, humans and infrastructure	Strict waste acceptance and housekeeping measures to be implemented. Waste not likely to be attractive to pests.	Low	Low	Low
Noise	Abnormal noise	On-site personnel and local human population	All vehicles and plant handling materials will comprise modern plant designed to meet current legislative controls relating to noise and vibration emissions. All plant and vehicles will also be subject to a preventative maintenance programme and the requirements of the steel works noise management plan. To ensure that noise and vibration emissions from the on-site activities are not likely to cause off-site pollution DLS will prevent, or where that is not practicable minimise, off-site noise migration. Measures that will be adopted will include the use of modern modular plant fitted with appropriate silencers, implementation of preventative maintenance programme, orientating site activities to minimise noise from reversing warning devices and use of broadband directional alarm to vehicles, where feasible. As there are few sensitive receptors within 500m of the site, the risks are considered to be low and acceptable provided the control measures are implemented.	Low	Medium	Low
Odour	Abnormal odour	On-site personnel and local human population	Biodegradable/putrescible waste will not be accepted at SSQ. Recovery operations will not expose biodegradable/putrescible wastes that would lead to generation of malodorous gas and leachate encourage scavenging. Quarantine area with sealed skip will be available at all times in case of abnormal incident. Site operated in accordance with Permit conditions	Low	Medium	Low
Litter / mud	Escape of light fraction waste/mud	Local road network, environment and humans	Waste activities not a significant source of light fraction waste. All areas to be subject to daily housekeeping checks. Each area to be provided with wheel wash and weighbridge.	Low	Mild	Very Low

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### **3.3 Spill Kits and Emergency Grab Pack**

Within the working area, a secure box will contain a copy of this plan. NRW and FRS will have coded access to the box.

The marked box will also contain:

- Fire Marshall high viz vest
- Spare PPE - (nitrile gloves, PVC gauntlets, overalls, overshoes, safety goggles)
- Additional Fire extinguishers
- Spill kits with absorbents (granules) and booms
- First Aid Kit
- Disposal bags
- Cable ties
- Duct tape
- Spare drip trays
- Emergency signage
- Tool box

Sand bags and empty skips will also be provided in an adjacent separate container.

Separate spill kits are also deployed in each site area. These comprise:

- Absorbent pads, granules, cushions and socks
- Disposal bags, bins and ties

Similar (smaller) spill kits and fire extinguishers will also be located on each item of plant. All of these spill kits are for dealing with minor spillages.

### **3.4 Site Security**

Access is directly off the A4810 running along the northern boundary of the site. At the end of each day site will be locked and secured.

At present, the site benefits from unrestricted vehicular access to the site (i.e. in terms of the site being accessed at any time of the day/night, by any category of vehicle). However, under normal operations the site will operate between 07:00 and 16:30 and deliveries will be restricted to occur between these times. The site will not accept waste or operate outside of these hours.

SSQ is ultimately within the land holding of Tata and subject to 24hr security.

### **3.5 EMS Procedures**

Procedures are in place for waste acceptance waste management including the identification and management of non-permitted wastes and contraries. These measures are aimed at ensuring the quality of the recovered product and ensuring only the appropriate waste is treated.

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### **3.5.1 Spillage**

Pollution may result from accidental leaks or spillages from waste, plant and vehicles.

#### **Spillage/Leakage – Steps to be taken**

The following procedure is adopted for all accidental spillages of liquids. Responsibility for any spillage lies with the first person noticing or finding the spill and they must take steps to contain it by taking action as follows:

If there is a fire or medical attention needed, contact emergency services on 999.

Attend to any people who may be contaminated. Contaminated clothing should be removed immediately and the skin flushed with copious amounts of water until emergency assistance arrives. Take advice from 999 call handler where relevant.

If a volatile, flammable material is spilled, immediately warn everyone, control sources of ignition and ventilate the area.

If safe to do so, stop the spill/leak if still occurring:

- Area surrounding spillage to be isolated by application of absorbent granules/mats or clean sand to prevent vehicles or personnel from passing over the area and thus spreading the spilled liquid. Apply the loose spill control materials working from the outside, circling to the inside. This reduces the chances of splash or spread of the spilled chemical.

When spill materials have been absorbed use brush and scoop to place materials in appropriate container. Polyethylene bags may be used for small spills. 5 gallon drums or 20 gallon drums with polyethylene liners may be appropriate for larger quantities.

- Site manager notified as soon as possible.
- Spill mats and spill kits, including absorbent granules, are to be spread on the spilled liquid until all is absorbed.
- When all the liquid is absorbed, the contaminated spill kits will be loaded into a suitable drum for removal by a suitably licensed carrier to a licensed disposal or recovery facility.
- Every instance of spill MUST be recorded and investigated as an accident or incident.

#### **Practice Spill Drills**

Spill drills should be performed to check the effectiveness of procedures, equipment and personnel and to identify improvements.

### **3.6 Management Plans**

The site has specific management plans for mitigation and prevention of incidents that could give rise to pollution or Permit breach.

In combination, these enable the site to be operated in way that ensures compliance with the Permit and minimises the risk of pollution.

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### 3.7 Training

All relevant staff working on the permitted activities will be trained on the requirement of the Permit and supporting documented management systems. To assist with management of training records and needs, DLS will regularly undertake analysis to identify training needs, skill gaps and record all training on the relevant forms.

Management will ensure that all relevant staff are:

- trained in aspects that can lead to pollution and the measures to be taken to prevent that pollution.
- trained to deal with accidents and incidents.
- aware of responsibilities under the Permit and Management Plans.
- aware of the importance of equipment and plant maintenance.
- competent to operate machinery and provided with safe operating instructions for that equipment or activity.
- appropriately inducted, including contractors.

Records of training will be maintained by DLS.

The management is fully committed to protecting the environment and demonstrating continual environmental improvement. Through effective training, communication and delegation, management will encourage all employees to be committed to the full implementation of this EMS.

Following a training needs assessment, training of each employee will comprise a combination of techniques including:

- Induction training – new employees (and existing employees who have not yet been inducted) will be talked and walked through the site rules and practical steps required during waste acceptance, handling and storage to prevent pollution and spot potential problems such as contraries, unacceptable waste, housekeeping improvements and fire risk awareness.
- Tool box talks lead by site management and external parties – these will focus on the key issues detailed in the management plans and be repeated in accordance with a training schedule to ensure the key technical precautions are at the forefront of everyone's mind.
- Use of free on-line and hard-copy training resources provided by WAMITAB.
- Hands-on practical incident management including evacuation drills, firefighting and extinguisher demonstrations.

Key personnel and senior management will also be trained in basic First Aid by a qualified third party institution. Records of this training will be included in the operating record for the facility.

## 4 INCIDENCE RESPONSE

This section details the specific actions personnel will take during an incident.

### 4.1 Emergency Contacts

Key emergency contact details are summarised in Table 4-1.

**Table 4-1 Emergency contact details - TBC**

<b>SITE DETAILS</b>				
<b>Location:</b>				
<b>Postcode:</b>				
<b>Site Access Grid Reference:</b>				
<b>What3words location for site entrance</b>				
<b>SITE CONTACTS</b>		<b>Name</b>	<b>Office Hours (specify)</b>	<b>Out of hours</b>
<b>Managing Director (Key holder):</b>				
General Manager:				
<b>EMERGENCY SERVICES</b>		<b>Office Hours</b>	<b>Out of hours</b>	
Fire/Ambulance/Police		999	999	
Fire: South Wales Fire and Rescue (non-emergency)		01443 232000		
<b>REGULATORS</b>				
Health and Safety Executive (HSE)		0345 300 9923	0151 922 935	
Local Authority – Newport Council				
Natural Resources Wales (24hr emergency)		0300 065 3000	0300 065 3000	
<b>UTILITY/KEY SERVICES</b>				
Fuel supplier	Oils for Wales	01267 275 777		
Tanker company/Waste removal	GD Environmental Ltd	GD - 01633 277755		
<b>IMMEDIATE NEIGHBOURS</b>				

### 4.2 Site Evacuation

In the event of an incident all personnel would muster at site entrance point joining Southside Queensway.

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## **5 ACTIONS FOLLOWING AN INCIDENT**

Incidents that impact the environment or cause breach of Permit conditions can cause significant direct and indirect harm to people, the environment, commercial activities and public resources.

### **5.1 Near Misses**

All ear misses will be reported and recorded and investigated by the Site Manager who, in-turn, will report to Senior Management. The aim of the investigation should be to identify the root cause and to prevent the same thing happening again. This will be documented.

### **5.2 On-site Assets**

Although the assets are of economic importance, DLS recognises that these items can be replaced and that, at no time, should personnel or the third parties such as the Fire Rescue Service (FRS) risk human life in their protection.

### **5.3 Receptors**

Receptor screening has examined the presence of environmental, human and natural resource receptors. The evaluation has essentially been limited to a radial zone centred on the facility with a diameter of some 2000m. This does not preclude receptors existing beyond this distance, but due to the nature of the hazards if the risks are shown to be acceptable to the receptors within this zone, then the risks posed to receptors outside this zone should also be acceptable.

Table 5-2 summarises the identified receptors.

**Table 5-1 Receptor Screening Matrix**

<b>Main Receptor Category</b>	<b>Receptor/Benefactor Type</b>	<b>Receptor/Benefactor Detail</b>	<b>Comment/Justification</b>
Human	On-site DLS/ sub-contractor staff	Site operatives	A small number of staff would be involved with all aspects of the recovery operations.
	Delivery Personnel	Delivery Driver and Crew	Some waste will be delivered for processing and some products will be removed off site
	Emergency Services Staff	Emergency Services Staff	Emergency personnel may be required at any part of the site.
	Other Working Personnel	Other companies staff working at SSQ	Site is surrounded by land owned by Tata
	General Public	Footpath Walkers	No authorised access to SSQ
	Regulatory Staff	NRW Staff	Access all areas on an intermittent basis
Groundwater	Perched groundwater at base of slag	Groundwater perched on impermeable clay	Groundwater not considered plausible receptor given presence of natural geological barrier and lack of aquifers
Surface Water	Drainage Ditches	Drainage ditches surround SSQ and drain to Water Treatment Plant	Cut-off ditches proven to be protective of wider environment
Primary Resources	Aggregate users	Construction activities benefit from use of recycled aggregate	On-site and off-site users of aggregate
Flora/Fauna	Gwent Levels SSSI	Surface water ditches located to south of proposed activities. Ditches are set upon the impermeable clay	Nationally important habitats and species.

## 5.4 Key Infrastructure

There are several industrial activities in the area. These are related to the immediate activities to the north of SSQ and in the main steelworks. This includes the COMAH facilities at Air Products on the northern boundary of SSQ.

## 5.5 Engaging Community

During an incident, the Senior Management Team would phone / message the immediate neighbour to explain that there is an ongoing incident and to advise on measures being taken.

Following the incident, the Managing Director will meet with the neighbours to explain what has happened and the steps that will be taken to minimise an incident in the future. The neighbours will also be encouraged to provide feedback that would be accommodated in the updated EAMP.

## 5.6 Becoming Operational Again

The precise actions required following an incident will be dependent on the scale and nature of the incident. Protection of the environment will be prioritised and the clean-up operation, where required, will be carried out in full consultation with NRW. Permitted activities will not re-commence without NRW approval.

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Following an internal review of the cause of the incident, the findings will be integrated to an updated EAMP. Such a review would also accommodate any observations made by NRW, FRS or other third parties.

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## **6 REVIEW AND MONITORING**

### **6.1 Routine Review**

Each year this EAMP will be subject to review. This will be aimed at ensuring that the procedures implemented on site match those documented. Improvement programmes will be developed to ensure that risks are always minimised.

### **6.2 Monitoring**

The following Key Performance Indicators will be used to monitor the effectiveness of this EAMP:

- Number of environmental incidents recorded annually
- Achieving set schedules and time frames (evacuation drills and audits)
- Measuring the number of Fire Service call outs against cause
- Number and nature of enforcement, alterations or prohibition notices from statutory authorities
- Quarterly/six monthly/annual premises inspection and meetings to ensure actions and progress are made
- Annual audit of all fire systems by external party
- Six-monthly review of all spill kits

Fire extinguishers would be subject to monthly visual inspection to check for damage and accessibility and annually tested and serviced, as required, in accordance with manufacturers requirements.

### **6.3 Audit**

DLS recognises that it is important for the day-to-day activities to implement what is written in the EMS and Management Plans to ensure compliance with the Permit and manage and minimise risks to the environment, humans and property. Therefore, a planned programme of internal and external audit will be implemented. Internal audits will be undertaken quarterly and external audits annually and coupled to the annual review. The findings of all audits will be documented. During the audits, the following aspects will be evaluated:

- Paperwork & Records – Maintenance schedules, daily checks, staff training, transfer notes, stock rotation, location and site plans.
- Procedures - Waste Treatment, waste acceptance, dust management, integrity of infrastructure.
- Prevention – check of stockpile sizes and site security.
- Emergency Response - disposal of waste, firefighting equipment.

A compliance assessment may not be limited to these areas, but it gives a good indication of what an assessment may comprise.

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## **6.4 Update following Incident**

In addition to the regular annual review and six monthly monitoring and audit, this EAMP would be reviewed and updated where necessary following an incident.

All aspects of the EAMP would be available for review during any update or review. Focussed attention would, however, be made to ensure that the document captures potential changes to the risk profile and additional preventative and management techniques required.

## **6.5 Communication of Plan**

All staff will be trained on the relevant sections of this EAMP during their induction training and this training will be refreshed annually or after any amendment to the EAMP, whichever occurs soonest. Training will be recorded in each individual employees training records.

All contractors will be made aware of the key elements of the EAMP. This will be recorded in the Site Induction Training file.

All training on the EAMP will focus on the actions necessary to:

1. Prevent an incident occurring; and
2. Actions necessary if an incident occurs.



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