

# **ENVIRONMENTAL PLAN**

## **Fire Management Plan**

**EP – 08**

## 1. PURPOSE

To ensure that emergency planning is in place to reducing risk of incidents and to minimise the risk of harm to employees, third parties and the environment.

## 2. SCOPE

This Management Plan provides guidance on the appropriate preparation for, and response to, foreseeable incidents arising from Natural UK's Healthcare Waste Management Facility (HWMF) activities. Natural UK Ltd acknowledges its legal duties to control and manage any harmful emissions that could arise as part of its day to day activities and under part III of the Environmental Protection Act 1990, in respect of statutory nuisances.

## 3. RESPONSIBILITIES

The following personnel hold primary responsibility for ensuring that the requirements of this procedure are met. General responsibilities are summarised below:

Action	Responsibility
Ensuring that environmental response plans and equipment are in place on site.	Managing Directors Technically Competent Manager
Ensuring that staff have received appropriate training	Managing Directors Technically Competent Manager
Support and liaison	Managing Directors Technically Competent Manager
Completion of Weekly Environmental Checks	Operations Supervisor
Prompt reporting of environmental incidents	All
Reviewing environmental incidents for learning points	Managing Directors Technically Competent Manager

In certain instances, designated personnel may deputise for the Managing Director and or the Technically Competent Manager. In general, these deputies should operate within the same organisational functions as those with primary responsibility for the activity concerned. Natural UK, Natural Healthcare, NappiCycle staff frequently work on other companies sites and locations all staff must comply with those sites regulations and procedures all of the time.

## 4. REFERENCES

QMS -01 Working Plan

QMS -14 Management Systems Review

QMS -06 Non-Conformance Reporting

QMS -11 Health & Safety

EP -03 Spillage Management Plan

EP -04 Dust Management Plan

EP -09 Emergency & Incident Response Plan

Weekly Environmental Inspection Report

## 5. INCIDENT PREPAREDNESS

The Technically Competent Manager (TCM) is responsible for ensuring that adequate preparation has been made both to minimise the risk of incidents and to allow adequate emergency response. These measures shall include:

Periodic review to ensure that response capability is at the desired level.

The TCM will use the results of this exercise to identify requirements (training, equipment, etc) for his site. These requirements will be communicated to Management, who will put them in place, with the assistance of the Health and Safety Manager as required. Sighting of any emergency equipment will take into account the most likely areas of its use on site, security and ease of access in emergency.

The TCM shall set up an Emergency Plan including organisation and responsibilities, general precautions, liaison with the emergency services, detection systems (where relevant) and environmental training.

Emergency call out numbers will be clearly displayed on each site. These will include:

- **Technically Competent Manager**
- **Health & Safety Manager**
- **Managing Directors**
- **The Natural Resources Wales (NRW)**
- **Health & Safety Executive**
- **Police Service**
- **Fire Service**
- **Ambulance Service**
- **First Aider(s)**
- **Spill Response contractor (if applicable)**

## 6. FIRE MANAGEMENT PROCEDURE

Natural UK must employ the appropriate measures necessary to prevent pollution or minimise it when prevention is not practicable. The measures outlined in this document are a direct result of a risk assessments carried out to determine the main risks and likely impacts during the course of Natural UK and Nappicycles activities.

To create fire three things are needed: a source of ignition; fuel and oxygen (air). Within the facility there are a number of potential sources of ignition e.g. naked flames from space heaters, sparks from portable tools, electrical equipment, batteries & lighting and heat from machine operation. There are also a number of potential fuel sources including lubricating oils, gasoil, diesel, some chemicals, plastic receptacles and bins and waste materials.

Detailed risk assessments are in place within the health & safety and fire safety & COSHH procedures. Mitigating control measures are in place to minimise as far as practicable the overall risk of fire on site.

However, in the unlikely event that a fire should occur this procedure sets out mitigating controls that will reduce the potential impacts resulting from a fire to the surrounding environment and neighbours.

If there was a fire on-site the main emission risks are:

- Toxic smoke and dust from the combustion of materials such as plastic containers, oils, diesel fuels, a small quantity of chemicals and waste materials.
- Liquids leaking from damaged tanks and containers
- Liquids e.g. water and foams resulting from fire-fighting

Working on that basis to minimise the risk Natural UK will implement the following control measures:

### **Control Measures to minimise the risk of emissions resulting from Fire**

- The facility should be managed in accordance with the site Health & Safety procedures and Fire Risk Assessments
- The facility COSHH risk assessment should be regularly reviewed to understand the types and quantities of potentially flammable materials and chemicals held on site
- An Emergency Contacts list will be clearly displayed at various locations on-site
- Training to relevant personnel on Emergency & Incident Response shall be provided (EP 09)
- Floor surfaces, plant, equipment and storage containers should be cleaned regularly and be free of any build-up of dry, dusty or potentially combustible materials, preferably using vacuumation
- Wastes should be managed within the appropriate building on a sealed (dust free) impermeable surface.
- Access doors to buildings shall remain closed during processing/transfer operations.
- Incoming waste should be processed or transferred as soon as practicable and quantities of waste in storage bays kept low and within compliance limits
- Stockpiles of dry waste and output materials shall be kept at a low level and within compliance limits
- Fire prevention systems (fire extinguishers, smoke alarms) should be regularly checked and maintained
- Wet processing areas will be provided with perimeter wall bunding to contain liquid spillage from process tank failure
- Emergency spillage kits for oils and chemicals (in 240 litre wheelie bins) shall be available at a number of locations on-site and will contain drain covers, absorbent pads, socks, granules, pellets and booms for mopping up spillages
- Periodic environmental checks shall be undertaken around the site and documented (weekly environmental inspections).
- Incidence procedures are in place in order to act upon any nuisance, accidents, complaints or non-conformances (non-conformance /incident report)

## **7. RECORDS**

All incidents raised must be recorded and reported to the Responsible Manager to enable the causes to be investigated and to undergo a root cause analysis. This should ensure the likelihood of a re-occurrence is minimised. Records shall be kept on an incident response form and kept on file.

Weekly Environmental Inspection will be carried out by the Responsible Manager, documented and filed. Issues raised may require remedial actions and these can be documented on this form. The form should be reviewed and countersigned by the TCM or Managing Directors when the issues have been actioned or resolved.