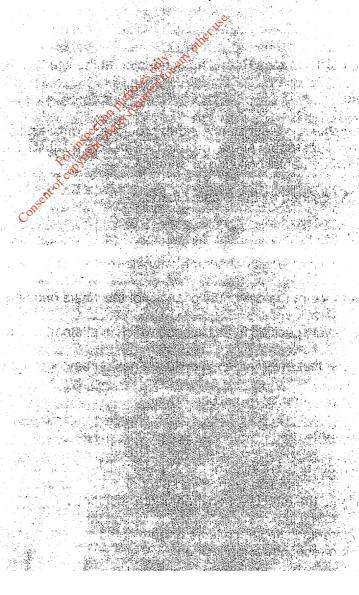
Attachment K: Contingency Arrangements

The following draft procedures are attached to describe the actions taken in the event of an accidental emission or spillage.

When the facility is operational these procedures will be incorporated into the company's environmental management system.



Procedure Title: Emergency Response		Procedure No:		
Date issued:	Last revised:	Revision No:		
Waste Licence Condition Number:				
Env. Off reference:				
Related procedures:				

To set out roles and responsibilities in connection with implementation of Thorntons Recycling response to an emergency and/or incident.

To provide guidance on actions to be taken in response to an emergency/ incident.

Scope

All activities of Thorntons Recycling conducted at the site.

Definitions

Harmful substance – a substance either prohibited from being accepted or discharged to a receiving medium (atmosphere, ground of water) or a substance released in sufficient quantities to cause environmental pollution or damage.

Incident - As defined by the Waste Licence

An emergency:

Any emission which does not comply with the requirements of the licence

Any exceedance of the daily duty capacity of the waste handling equipment

Any trigger level specified in this licence which is attained or exceeded

Any indication that environmental pollution has or may of taken place

Agency

– Environmental Protection Agency.

Responsibilities

It is the ultimate responsibility of the Managing Director to ensure sufficient and appropriate measures are adopted and employed throughout the organisation to prevent the occurrence, and/or mitigate the effects, of environmental incidents.

Site Managers and site supervisors or nominated representatives, are responsible for coordinating the response to an incident. It is the responsibility of all persons to ensure that they comply with the provisions of this procedure so far as they relate to matters within their control.

It is the responsibility of the Site Managers to ensure that their nominated representatives who may be called upon to respond to an incident have had appropriate training and instruction.

It is the responsibility of Site Managers to ensure that any necessary equipment for dealing with incidents is available on site.

Procedure

A suspected or detected incident will be immediately reported to the Environmental Manager, Operations Manager or nominated representative.

The Environmental Manager, Operations Manager, or nominated representative, will take all reasonable measures to ensure that any release is contained within the site boundary and that harm to human health and the environment is minimised, both within and beyond the site boundary.

In the event of an incident occurring, the Environmental Manager, Operations Manager, or nominated representative, will take all reasonable measures to ensure that any environmental damage is appropriately remedied.

The Environmental Manager, Operations Manager, or nominated representative shall:

- a) Notify the Agency as soon as practicable and in any case not later than 10.00 am the following working day after the occurrence of any incident;
- b) Submit a written record of the incident, using the Incident reporting Form, to the Agency as soon as practicable and in any case within five working days after the occurrence of any incident;
- c) In the event of any incident which relates to discharges to surface water, notify the Westmeath County Council as soon as practicable and in any case not later than 10:00am on the following working day after such an incident; by submitting the Incident Recording Form;
- d) Should any further actions be taken as a result of an incident occurring, the licensee shall forward a written report of those actions to the Agency as soon as practicable and no later than ten days after the initiation of those actions.

All incidents will be immediately reported to the Managing Director, Environmental Manager and Operations Manager.

Out-of hours incidents: If an incident occurs outside of normal working hours, the person discovering the incident (e.g security firm or passer-by) would call the emergency telephone number on the Site Entrance Notice Board. A system will be in place to ensure that the call is directed to a responsible member of staff at all times. The incident reporting procedure outlined above would then be initiated.

All incidents will be reported to all the relevant regulatory authorities in compliance with the appropriate procedure.

All contractors working at the site will be made aware of the contents of this procedure and be required to comply with its provisions.

Further References

None.

Record Forms

Environmental Incident Recording Form.



Procedure Title: Breakdown Of Essential Equipment		Procedure No:		
Date issued:	Last revised:	Revision No:		
Waste Licence Condition Number:				
Env. Off. Reference:				
Related procedures:				

This procedure covers the steps and operations taken in the event of a breakdown in essential equipment operated by Thorntons Recycling.

Scope

This procedure covers the requirement to detail the steps taken in the event of a breakdown at the site.

It covers the provision of three types of breakdown composting equipment breakdown, monitoring equipment breakdown and pollution prevention equipment breakdown.

Definitions

Essential Waste Handling Equipment machinery that is necessary for the efficient operation and steady throughput of waste and compost at the facility.

Essential Monitoring Equipment – machinery that is used for detecting and/or measuring environmental emissions from the facility

Duty Capacity – the maximum quantity of waste that can be handled per day

Responsibilities

The, Maintenance Manager and Operation Manager are responsible for the maintenance and smooth running of all essential onsite waste handling equipment at the site.

The Environmental Manager and Maintenance Manager are responsible for ensuring that all monitoring and pollution prevention equipment are in sound working order.

All pollution abatement and monitoring equipment shall be checked and tested every week. Records of such checks shall be documented and filed by the Environmental Manager.

The Maintenance Manager and Operations Manager shall create and operate a servicing calendar to maintain and document all services carried out on essential waste handling equipment.

Procedure (Waste Machinery and composting plant)

The facility will be fitted out with all the usual safety features relating to vehicles, visibility and general safety in the work place.

Composting tunnels: The primary method used to prevent overheating is the temperature feedback control of the blowers that is programmed to maintain the biomass temperature within defined limits.

In the event of a prolonged power cut, i.e. >36 hours the tunnels will be emptied by loader. If duty capacity is almost reached, waste shall be diverted to another composting plant or landfill without prior treatment and third party contractors shall be diverted from the facility.

Waste handling equipment: In the event of a breakdown of essential waste handling equipment the Maintenance Manager and Operations Manager shall be informed immediately so an assessment can be made of the breakdown.

If after inspection the machinery/plant cannot be fixed within one hour by onsite engineers then a standby machine will be substituted to continue waste handling.

If after 24 hours the machine is still inoperable, waste shall be diverted to another composting plant or landfill and third party contractors shall be diverted from the facility.

If the duty capacity of the plant is exceeded then the breakdown will be treated as an incident. An incident recording form shall be filled in and submitted to the Environmental Manager by the end of the working day.

Water supply: Water is required to add to the compost to maintain optimum moisture levels. Water will be obtained from recirculation of surface water run-off and from the water supply well. In the event of a breakdown of the water pump of loss of power, the procedure for waste handling equipment above shall be followed.

Procedure (Monitoring and Pollution Control Equipment)

In the event of a breakdown of essential monitoring and/or pollution control equipment the Environmental Manager shall be informed immediately so an assessment can be made of the breakdown.

If after inspection the equipment cannot be fixed by onsite engineers If onsite engineers cannot fix or replace a part/unit then an outside contractor will be contacted by the end of the working day. The breakdown will be fixed within 48 hours.

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None.

Record Forms

None.

Procedure Title: Fire Fighting		Procedure No:		
Date issued:	Last revised:	Revision No:		
Waste Licence Condition Number:				
Env. Off. Reference:				
Related procedures:				

This procedure covers the steps and operations taken in the event of a fire.

Scope

This procedure covers the requirement to detail the steps taken in handling the outbreak of a fire at the site.

Definitions

None.

Responsibilities

The Operations Manager and Health and Safety Officer are responsible for identifying and highlighting all fire ricks on site. highlighting all fire risks on site.

The Health and Safety Officer is responsible for carrying out weekly checks of all fire fighting equipment.

Fire Drills shall be carried out twice a year and documented by the Health and Safety Officer.

It is the responsibility of all personnel to make themselves familiar with this procedure.

All Managers and Site Supervisors are to enforce the no smoking policy.

Site Supervisors and the Health and Safety officer are responsible for managing control and fighting of all fires.

Procedure

If a fire is detected on site the alarm will be raised and the building is to be immediately evacuated. Drivers should turn off engines and leave vehicles parked safely.

The fire brigade should be contacted by dialling 999. Details of the incident shall be reported.

An attempt should be made to fight small fires with the emergency equipment on site but only if

All dust/fire abatement sprinklers should be switched on.

All incoming traffic shall be diverted from the facility by the dispatch office and the weighbridge.

No building shall be re-entered until the Fire Brigade or Health and Safety Officer has informed personnel that it is safe to do so.

All fires shall be reported to the Health and Safety Officer and Operations Manager. Any emergency shall be treated as an emergency and therefore an incident.

Firewater retention:

The concrete base of the facility will be formed to provide for surface water and leachate control and containment and firewater retention.

In the event of a fire, firewater will be collected by the leachate or surface water collection system, depending on the area in which the firewater arises. All process and non-process areas will be bunded by kerbs which will contain firewater within those areas.

The leachate collection system will convey firewater to the leachate storage tanks, where the firewater can be held for testing. The results of the tests will be used to decide whether the firewater can be treated onsite in the leachate treatment plant, or whether the firewater will need to be tankered for offsite treatment.

Firewater entering the surface water system will be controlled by the use of an emergency stop valve at the surface water treatment plant, which will preclude flows leaving the system until such time that the firewater can be pumped from the system to either the leachate treatment plant or to tankers for offsite treatment.

Further References

Emergency Response

Record Forms

Incident Recording Form

Procedure Title: Spill Handling		Procedure No:		
Date issued:	Last revised:	Revision No:		
Waste Licence Condition Number:				
Env. Off. Reference:				
Related procedures:				

This procedure covers the steps and operations taken in the event of a spillage at the site, to ensure that ground and surface water pollution is prevented.

Scope

This procedure covers the requirement to detail the steps taken in the event of a spillage of any substance at Thorntons Recycling that has the potential to pollute the ground or water (e.g. compost leachate, diesel).

Definitions

Containment Boom – a boom which can contain spillages and prevent them from entering drains or watercourses.

Spill kit – portable kit containing adsorbent mats, socks and equipment to deal with spills.

Spill Team – at least five employees who have received training in relation to spill containment.

Responsibilities

The Operations Manager, Environmental Manager, and Site Supervisors are responsible for the identification and controlling of spills at Thorntons Recycling.

The Environmental Manager and Health and Safety Officer are responsible for ensuring all spill kits and spill cabinets are adequately stocked with pads, booms and other essential equipment.

It is the responsibility of all employees to ensure that they are familiar with members of the spill team and location of spill kits and cabinets.

The Maintenance Manager is responsible in ensuring all liquids are stored in bunded areas and that all tanks and drums are labelled.

Procedure

A member of the spill team will be notified immediately and the source of the spill shall be sealed off if possible.

The Environmental Manager, Operations Manager and area Site Supervisor will be contacted as soon as possible.

The Spill team shall contain the liquid spilt by sealing off the spill with containment booms; spill mats shall then be placed inside the booms to adsorb the liquid.

If any spilled liquid enters or has the potential to enter the drainage system then the cut off valves shall be sealed to prevent any spilt liquids entering the drainage system.

All significant spills shall be treated as an incident and the Emergency Response Procedure shall also be adhered to.

All contaminated adsorbent materials shall be collected and stored in a leak proof container.

The Environmental Manager will organise for its safe removal by an authorised contractor.

Further References

None.

Record Forms

None.

