

## POLLUTION INCIDENT RESPONSE PLAN

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**SCOPE:** *This guidance sets out best practice for producing a Pollution Incident Response Plan to deal with an environmental incident or personal contamination on a malting site. Preparing and following such a plan will help prevent or reduce damage should an incident occur.*

### **Risk Assessment**

Causes of environmental incidents on a malting site include:

- Delivery or use of materials
- Overfilling containment vessels
- Containment failure
- Equipment failure
- Oil pipework failure
- Hydraulic hose bursting on a tipping lorry
- Discharge of partially treated or raw effluent
- Fire and explosion
- Flooding
- Deliberate acts (vandalism)

Before deciding on what measures need to be put in place, a Pollution Risk Assessment should be carried out.

A Risk Assessment should consider:

- the biological, chemical and physical properties of a material that could be spilt
- the effects of accidents, flooding and failure of containment
- how materials are stored or moved around site and the condition of storage
- the location to water courses and to any environmentally sensitive areas e.g. Sites of Special Scientific Interest
- areas of unsurfaced or porous ground
- the risks posed to people (including neighbours) and the environment and the extent of possible damage

A Risk Assessment should be carried out to:

1. Identify materials stored and used at the maltings and processes that may be a hazard.
2. Identify where hazards may impact on receptors.
3. Assess the likelihood and severity of any potential hazard.

Once the Risk Assessment has been completed, the risks should be prioritised to focus on those that will cause most harm. Identify measures needed to reduce the likelihood and severity of a spill. Include these in a Pollution Incident Response Plan.

## Site Plan(s)

There should be plan(s) of the site showing layout and access details.

More than one plan can be used if there is too much detail.

The Site Plan must be:

- Stored securely
- In a location known to employees
- Readily available to all in the event of an emergency

Features that should be shown on the plan are:

- Buildings and other main constructions
- The site entrances and exits available to the Emergency Services

Drainage: including

- Foul drainage (red)
- Surface water drainage (blue)
- Combined drainage (marked with a red letter C)

Drainage: indicate

- Direction of flow
- Inspection points to detect pollution
- Discharge points to the water course or sewer
- Location of manhole covers and drains
- Number the drain covers to help identify them
- Location of any penstock valves and interceptors

Utilities:

- Electricity, gas and water supply isolating switches/valves

Other key locations:

- Storage location of hazardous materials
- Location of effluent treatment plant
- Vulnerable receptors
- Areas of porous or unmade ground
- Location of mains water supply stopcocks
- Location of hydrants
- Any bunded areas, including materials stored and estimated retention capacity.
- Any watercourse, borehole or well located on or near the site
- Fire assembly point

## **Key Site and Emergency Contact List**

Prepare a list of key site and emergency contacts (names, telephone numbers, include out of hours).

Site Name and Address:

Site contacts:

- Site Manager
- Emergency management team
- Duty Manager(s)
- H&S Manager
- Environment Manager
- First aiders
- Maintenance

Emergency services:

- Emergency Services (Police/Fire/Ambulance)
- Local Medical Centre/Hospital

Regulators:

- Health and Safety Executive
- Local Authority
- Environmental Regulator Incident Hotline
- Environmental Regulator Local Contact
- Natural England
- Scottish Natural Heritage

Utility/key services:

- Water company
- Gas supplier
- Electricity supplier
- Oil supplier
- Chemical supplier
- Waste contractor
- Specialist haulage contractor (waste transfers)

Other key contacts:

- Head office
- Neighbours
- Adjacent landowners
- Specialist advisors

### Chemical, Material and Waste Inventory

Prepare a table of chemicals, materials and wastes that are stored on site and could cause harm to the environment if they escape e.g.

Location	Equipment/Substance	Construction	Capacity	Bund Capacity	Internal Check
Barley Drier Plant	Fuel Oil Storage Tanks	Steel Tanks with Brick Bund	2 x 54,000lt	110%	Monthly Inspection
Effluent Plant	Treatment/Aeration Tanks	Vitreous Glass Tanks on a Concrete Base	2 x 600,000 gallons		Monthly Inspection

Inspect and record the condition of the equipment on a regular basis. Carry out maintenance as required.

Material Safety Data Sheets (MSDS) must be available for any substance that could cause harm to health or the environment.

### Pollution Prevention Equipment Inventory

Record the equipment and materials you have on site to deal with pollution incidents and their locations e.g.

Type of Equipment	Location
Absorbents	Stores
Drain mats/covers	Stores
Pipe blockers	Stores
Booms	Stores
Pumps	Engineers Workshop
Shovel	Stores
Sand/Earth	Stores Yard
Sand bags	Stores
Vehicle Spill Kits	Barley Intake Pits

Provide training in the use of Pollution Prevention Equipment.

### Activation and Response Plan

Clearly define the circumstances when the Plan should be activated.

Dealing with a spill may involve one or both of the following:

- Environmental contamination
- Personal contamination

Ensure there is a documented plan in place for dealing with each scenario.

The following will assist in developing a procedure for your site. Action taken will be dependent on the nature and seriousness of the spill.

### Immediate Response

All spills must be reported immediately to your Manager.

ONLY TACKLE AN INCIDENT IF YOU HAVE BEEN TRAINED AND IT'S SAFE TO DO SO.

Identify what has been spilt and assess the risks to health and the environment using MSDS's.

Decide if Emergency Services and Environmental Regulators are required or if the situation can be dealt with in-house.

Evacuate the site (if necessary).

Move people a safe distance away from any fumes etc.

Seal off the area to prevent further exposure of people and to prevent further spreading of the spill by people and equipment.

Help any injured or exposed people and summon medical help.

Prevent liquid spills e.g. effluent plant or firewater from entering natural waterways.

Block off drains with Spill Kit Material.

Close penstock valves or shut-off valves.

Booms can be deployed on hard surfaces or a water course.

Contain liquid spills by absorbing with a suitable inert solid (sand, earth) or cover powders to prevent them being blown about.

If the spill is as a result of a leak from fixed equipment, or a vehicle, place a container under the leak (if possible) to capture drips until repairs can be made.

Stop the leak or spill at source e.g. stand up a knocked over container

### **Clean Up**

Locate the Material Safety Data Sheets for the spilled material.

Review the information given on the potential risks to health, safety and the environment.

Put on the recommended personal protective equipment (face shield, goggles, gloves, overalls and protective boots).

Assemble the proper materials and equipment for the clean-up.

If the spill takes on unusual properties (odour, smoke, bubbling), IMMEDIATELY stop the clean-up, evacuate the area and contact the Emergency Services.

Depending on the nature of the spill it may be necessary to neutralise to render it safe.

Spills of dry materials must be swept or vacuumed up and not washed to drain.

Wash any equipment or floors so that no traces of the chemical remain.

Place the contaminated absorbent material and PPE in a container suitable for storage and transportation off-site by a specialist company.

Absorb the wash water and place it in the same container with the contaminated absorbent materials.

Label the container as containing hazardous material.

Store the waste safely until it can be collected.

### **Personal Contamination**

Know where the nearest eyewash and safety shower is located.

For small spills on the skin, eyes or hair, flush immediately with water.

For spills on clothing, immediately remove contaminated clothing and stand under running water.

Inform your Manager and seek medical advice.

### **Waste**

Waste must be disposed of legally, safely and properly.

Waste material from an incident will come under the Duty of Care from the Environmental Act 1990.

The waste must be transferred to a registered waste carrier.

If the waste is hazardous or special waste in Scotland, additional requirements will apply and its movement must be accompanied by a waste transfer note.

Include procedures in the plan for dealing with any waste arising from the incident.

### **Staff Training**

All relevant staff must know how and when to contact emergency responders.

Train staff in evacuation procedures.

Staff must be trained in the use of spill kits, drain blockers and other pollution control equipment and the operation of pollution control devices. Maintain documented records of training.

Identify any special methods to deal with substances posing particular health or environmental risks.

Identify procedures for recovering spilled product and the safe handling and legal disposal of any waste associated with the incident.

Ensure trained staff are available to deal with media enquiries.

### **Plan Testing**

Test the plan with regular exercises.

These are required to demonstrate:

- Does it work?
- Develop staff competencies in emergency response
- Test standard procedures

Ideally test the plan as a live exercise.

### **Review and Maintenance**

Review the plan on a regular basis - at least annually. Update the plan after an exercise or actual incidents. Communicate all changes to staff and other responders as appropriate.