

Environmental Emergency Preparedness and Response



1.0 Purpose	The purpose of this procedure is to outline what shall be undertaken to prepare for and respond to an environmental emergency.	
2.0 Phase	Construction	
3.0 Responsible	Action	
Project Manager	Procedure is implemented	
Site Team	Procedure is carried out and contractors and operatives work in accordance with it	
Sustainability Team	Reviews and checks is appropriate	
4.0 Inputs required	Project Sustainability Plan	
5.0 Procedure		

5.1 Emergency preparedness

Small containers / drums

- Number of containers and contents shall be kept to a minimum
- If unavoidable they must be stored on drip trays when in use around site
- Must have sufficient strength and structural integrity so it won't leak or burst
- Must never be stored on top of one another - this greatly increases the risk of drums splitting under pressure or falling over
- Lids shall be kept on. Containers shall always be stored upright unless using flow control taps for controlled pouring from barrels and drums
- Hand pumps for drums and smaller containers locked away at night
- Must always be stored on a secondary containment system such as a bund, drip tray or sump pallet. If oil is stored on a drip tray in drums, the tray must be able to contain at least 25% of the total drum volume
- Materials and substances shall be sheltered from the elements to avoid corrosion and to prevent bunds and secondary containment filling with rainwater
- Substances shall be retained in the original packaging where possible. However, when it is necessary to decant into other containers, these containers shall be compatible with the liquid being used and shall also be clearly and durably labeled to ensure proper identification and safe handling information in accordance with relevant legislation

Fuel store / fuel bowsers / COSHH / chemical store:

- Must be stored on an impervious base
- Must be in good condition and well maintained
- Must be secured to prevent theft or vandalism

- The minimum required amount of fuel and chemicals shall be stored on site
- All fuel bowzers that hold over 200l of fuel must be integrally bunded with secondary containment that can hold 110% of the total volume of the tank
- Preference shall be given to approved refueling tanks with automatic cut off technology
- A Spill Response poster shall be displayed adjacent to all bulk fuel and COSHH / chemical storage areas.
- All hazardous substances must be stored within a COSHH / chemical store
- For all COSHH substances a material safety data sheet and / or COSHH assessment must be available at all times on site

Inspection and maintenance

- All storage areas and the pollution protection measures in place shall be inspected regularly. This shall include, but not be limited to, an inspection of the integrity of the storage facilities and bunds, the existence of rainwater in bunds / drip trays / plant nappies, the condition of secondary containment and evidence of any leaks / spills.
- Any maintenance required must be carried out immediately by a suitably qualified person.

Location of COSHH / chemical store / fuel storage tank

All COSHH / chemical stores and fuel storage containers shall be located:

- 10m away from a watercourse
- On hard standing
- Away from areas at risk from flooding, drains and site boundaries
- Away from areas of high vehicle movement, and protected from vehicle collision

Spill kits, drain blockers and other pollution control equipment shall be made available on site, and the location of these clearly documented on the Drainage Plan.

Refuelling

- Delivery of fuel to the site shall be by approved highway tanks or mobile refueling tanks. Staff trained in delivery and emergency procedures shall supervise all deliveries to avoid spillages.
- Tanks must only be filled to 90% of the total volume to avoid potential overflow and allow for expansion.
- The operation of moving equipment in the immediate area of re-fueling shall be suspended.
- The relevant person must prepare/source material safety data sheets to identify potentially polluting materials or fuels, the manner in which they shall be stored and information that would be required in the event of an emergency occurring.

Dispensing

- Dispensing of fuel from the main storage tank into vehicles / smaller containers shall take place at an appropriate location, away from sensitive receptors and in a bunded area or over a drip tray.

Managing drainage on site

Identification

All drainage systems and water bodies on or near the site shall be identified before work commences. These may include land drains, foul sewers, surface water drains and soakaways, as well as rivers, streams or aquifers.

The **Environmental Emergency Response Plan** must be completed prior to construction commencing in order to ensure best practice with regard to temporary drainage design and production of the drainage plan. A drainage plan shall be obtained from the relevant consultant and this shall be kept up to date as changes are made.

Where practicable, clearly distinguish between the surface and foul manhole covers and gullies on site and mark them appropriately for ease of identification. The following colour co-ordination is suggested by the statutory body:

- Blue for surface water
- Red for foul water
- Red for combined

Project toilet sewage connections must be correctly connected into the foul water drain system. Agreement may be required from the local water authority. Prior to undertaking mechanical and electrical commissioning, a flushing consent is required from the local water authority for flushing the water down the drains. This should be applied for by the Mechanical & Electrical subcontractor and must be in place prior to the commencement of flushing. A copy of the consent must be retained within the onsite Sustainability File.

Protection

Only clean water (rainwater, clean surface runoff etc) shall be allowed to enter surface water drains. It is ILLEGAL to put any polluting matter into controlled waters without obtaining permission from the environmental regulator. Controlled waters include rivers, streams, coastal waters, ponds, lakes, lochs, docks and groundwater. Remember that storm water drains may lead to controlled waters, even if distant from the site. Silty water, concrete washout water, mortar wash water, oily water and chemicals all constitute a polluting matter, and if any of these substances enter controlled waters, this is considered a pollution offence and must be treated as an environmental emergency. This includes concrete washout waters, silty water from excavations, wheel washing and road cleaning.

Pollution prevention equipment

- The relevant person shall ensure that adequate pollution prevention equipment such as spill kits, absorbent materials and drip trays / plant nappies are readily available and accessible where re-fueling and dispensing is taking place.
- Spill kits must be of a suitable size which reflects the amount of fuel that is stored on site.
- Staff and contractors that are handling fuel shall be trained in their use.
- Where other relevant COSHH materials are present on site e.g. chemicals, safety data sheets shall be reviewed to ensure suitable spill kits are also available.

Maintenance and housekeeping

- All ancillary equipment (valves, hoses etc.) shall be contained securely within the bund when not in use and the tanks shall be locked.
- If bunds, drip trays and plant nappies require emptying, the waste material may contain oils and fuel and shall be disposed of appropriately in compliance with current legislation.

Emergency preparedness testing

Emergency preparedness testing must be carried out in line with the risk identified in the Project Sustainability Plan.

5.2 **Emergency response**

Environmental emergency response plan

Every site must complete the **Environmental Emergency Response Plan** template before construction starts, to ensure environmental risks on site are minimised and managed appropriately.

It shall be updated regularly for example when the drainage system becomes live.

Action in the event of a pollution incident

Pollution incidents

On detecting a pollution incident, the STOP-CONTAIN-NOTIFY process must be followed.

Site management shall refer to the **Environmental Emergency Response Plan**, for further information on any remaining risks and extent of damage.

Other incidents

Nuisance

Where nuisance (e.g. dust, noise) or other issues are caused and these result in complaints from neighbours and/or visit(s) from regulators, the relevant person shall contact the site management team and the Sustainability / HSQE Manager / Advisor, agreeing an appropriate course of action.

Contaminated land

If suspicious substances, drums and containers, underground structures, soil discoloration or unpleasant smells are uncovered during construction, all works must stop and the area be made safe. The H&S department and Sustainability Advisor/ Manager must be informed immediately and further sampling and analysis must be undertaken.

Efforts must be made to avoid contaminating the ground during the construction activities. Potential contaminants could consist of hazardous demolition materials, unauthorised combustion, contaminated fill, diesel fuels and oils from construction equipment, hazardous construction chemicals, pile drilling mud, waste materials.

Covered skips shall be used for the removal of contaminated materials from site. Drivers shall be discouraged from covering the skips unless wearing appropriate PPE. Detailed waste movement records must be collected and recorded. Where remediation works are being undertaken, and vehicles are required to travel on public roads, washing shall include the under body and wheel arches.

Ecology

In the event of discovering flora, fauna, invasive species or injurious weeds that could be harmed and/or disturbed as a result of construction operations, works must stop and the sustainability team notified.

Regulatory visits

Shall the site receive a visit from a regulator (either in response to an incident or otherwise), the sustainability team shall be informed.

Other incidents

Aspects and impacts not covered in this section and identified as significant for the project shall also be considered in the preparedness and response plan e.g. disturbance of protected flora or fauna, smoke or fumes.

Reporting minor and major environmental incidents

Any visit by, or communication from an environmental regulator (e.g. EA, NRW, SEPA, EHO etc.) must be communicated to a member of the HSQE or sustainability team. The HSQE or sustainability team shall then provide advice and guidance on how best to deal with and/or respond.

Minor incident

A minor environmental incident or consent infringement capable of being resolved and contained by immediate action on a localised scale by those present or near the incident e.g. minimal contamination of land, effect on air quality, or effect on local ecosystem.

For minor incidents, the Environmental Emergency Reporting Form must be completed and returned to the Sustainability Manager/ Advisor within 48 hours. The HSQE / sustainability team will then contact the site to agree on corrective and preventative actions.

Major incident

A major environmental incident requires the involvement of external emergency services and/or regulatory authorities. This may subsequently lead to prosecution or restriction of works by external bodies e.g. major spillage to controlled water, destruction or major impact on protected and/or important fauna and flora; spillage to ground requiring extensive decontamination measures.

For major incidents, the HSQE / sustainability team must be contacted immediately via telephone.

Group Incident / Accident Reporting Protocols shall be followed immediately following a major incident. The Significant Event reporting template shall be completed as soon as possible and emailed to se.team@isgplc.com.

The HSQE / sustainability team will notify the relevant authority if;

- Pollution has reached surface drains or surface water bodies. This shall be reported to the Environment Agency, in England, Natural Resources Wales, or SEPA in Scotland.
- If pollution has entered foul drains this shall be reported to the utility company.

Major incidents will be investigated by the HSQE / sustainability team and site management must facilitate and assist with this investigation where required. Any recommended actions must be implemented within the agreed timescale and the report signed off by the site management team.

If clean-up of polluting materials is required, the Emergency Spill Response Contractor, Cleansing Service Group (CSG), must be contacted.

END

6.0	Output/s delivered by this procedure
	Environmental Emergency Response Plan Environmental Emergency Reporting Form
7.0	Key related information
	Non- applicable