



HSE RISK 009 Risk Assessments

Risk Assessment	SW 009	Location:	Site Wide	Operation: (Explain the operation / process / task)						Conducted By:	K.Mackinnon				
Revision Number:	0				Contamination of groundwater, surface water and soil through current operations					Date:	23.03.15				
HAZARD IDENTIFICATION			RISK LEVEL			METHOD OF REDUCTION OF RISK					FINAL RISK LEVEL				
Hazard Number	The Hazard (what could cause harm)	The Risk (how could it cause harm)	Who may be Harmed/Affected Parties (Employees, Contractors, Visitors and Environment)	Likelihood of Injury/Impact	Severity of Injury/Impact	Risk Level	Control Measures	By Whom	Completed By	Likelihood of Injury/Impact	Severity of Injury/Impact	Risk Level	Hazard Control	Associated Documents	Review Date
1	Spill of hazardous chemical	The chemical could enter the surface water drains or contaminate the ground	Environment, Employees	4	4	16	Spill training is undertaken on site for all relevant employees. There is also a spill work instruction in place- HSE WI 005. The whole site has been evaluated and spill kits are located in strategic areas around site i.e. chemical storage areas, chemical unloading areas. HSE WI 008 Environmental Emergency Procedure in place for shut-off valves.	Employees	This is on-going	2	2	4	AC, PPE	HSE WI 005, HSE WI 008	
2	Unknown chemicals stored on site	Unaware of risks associated with chemical and the potential environmental/health and safety damage that could be caused	Environment, Employees	4	3	12	There is a system in place on site where before a chemical can be allowed on site - a trial plan must be established. The MSDS for the product must also be supplied and a COSHH assessment undertaken to establish the HSE risks involved with the product and the control measures which need to be put in place both environmental and health and safety e.g. additional bunding.	Environmental Manager, H&S Manager, Department Manager	This system is on-going on site	2	2	4	AC	HSE REG 010	
3	Lack of Maintenance	Chemical contamination of surface water	Environment, Employees	4	3	12	There is a maintenance programme in place where the chemical tanks are inspected on a regular basis by the maintenance department. Any leaking chemical pumps will be identified on site walkabouts. They will be reported to maintenance and action taken immediately. Weekly visits by chemical contractors also enables any maintenance issues in regards to damaged equipment, leaks to be picked up.	Maintenance	This is on-going	2	2	4	AC	MRT3 (5-6), MRT 5 (6)	
4	Incorrect Storage of Chemicals-not banded/incompatible	The chemical could enter the surface water drains or contaminate the surrounding ground	Environment, Employees	3	2	6	On site there are designated chemical storage areas. There is a chemical plan which takes into account the incompatibilities of chemicals used on site. The chemicals are stored in areas with hard standing floors and no surface water drains will be in the area. Certain chemicals with a higher environmental risk will be banded separately e.g. sodium permanganate	Employees	This is on-going	2	2	4	AC	PML 50	
5	Use of hazardous chemicals	Environmental damage, risk to employees	Environment, Employees	4	3	12	There is a system in place on site where before a chemical can be allowed on site - a trial plan must be established. The MSDS for the product must also be supplied and a COSHH assessment undertaken to establish the HSE risks involved with the product and the control measures which need to be put in place both environmental and health and safety e.g. additional bunding. Where possible environmentally hazardous chemicals will either be substituted e.g. current biocide on paper machine or eliminated e.g. bromine doing on freshwater substituted for UV system. A list of all process chemicals has also been completed which lists any environmental hazards associated with the products used.	Employees	This is on-going	3	1	3	AC	HSE REG 010	
6	Rupture of Underground Tanks	The chemical could contaminate groundwater and the surrounding soil	Environment	3	3	9	There are three underground tanks on site which hold ink and glue washings from the converting process. These are pumped out on a regular basis and annually a test is undertaken by on-site maintenance to ensure that the tanks are not leaking. Site maintenance also check the tank levels on a daily basis to ensure that they do not overflow.	Maintenance	This is on-going	2	2	4	AC	MRT 3(1-4)	
7	Failure to report significant spill to NRW	Pollution to local area, enforcement action, damage to company reputation	Company, Environment	3	4	12	All significant spills which could cause environmental damage are reported immediately to NRW. A Schedule 5 will be completed by the Environmental Manager and sent to the NRW. This is part of our permit conditions. A full investigation will be undertaken by management and any remediation work will be undertaken. There is also an Accident Management Plan which details how any significant environmental issues should be dealt with.	Environmental Manager, Department Manager, Site Manager	This is on-going	2	2	4	AC	Schedule 5 Notification, HSE PRG 022	23.03.16
8	Chemical pipework leaking	Contamination of local area (ground and water), loss of chemical, cost to company	Environment, Employees	3	3	9	All pipework used on site for chemicals, is checked to ensure that the material is compatible with the chemical that it will be used for. Also to protect the pipework from damage a hard plastic sheath is placed around the pipework to prevent damage and subsequent leaks. All chemical pipework which is no longer in use is flushed with water and will be removed when deemed no longer to have a purpose.	Maintenance, Chemical Contractors, Department Managers	This is on-going	2	2	4	EC		
9	Chemical bund damage	Bund would not be fit for purpose- could cause environmental pollution incident	Environment, Employees	3	3	9	Any damage caused to a bund on site will be reported on HSE RISK 001. The bund will be evaluated to see whether it is possible to fix the bund e.g. purpose built bunds. If the bund can not be fixed and is no longer fit for purpose- it will be replaced with a new bund.	Maintenance	This is on-going	2	2	4	AC, EC	HSE RISK 001, HSE REG 002	
10	Lack of formal procedures in place	Incorrect handling of chemicals which could lead to environmental damage	Environment, Employees	3	3	9	There are a number of procedures on site for the use of chemicals. This includes handling, unloading, chemical tests, etc. All staff members who come into contact with chemicals will be signed off on the relevant procedures.	Environmental Manager, H&S Manager, Department Manager	This is on-going	2	2	4	AC, PPE	SSOW 200-PM-011, 200-PM-012, 200-PM-013, 200-PM-018, 100-PP-017, CV-MAIN-001	
11	Overuse of chemicals	Higher concentrations of chemical product in water system which could impact on the effluent plant	Environment	3	2	6	The chemical consumptions are monitored on a daily basis. This enables extraordinary usage of chemicals to be spotted immediately thus preventing excessive levels of chemicals in the system. Additionally the chemical levels are also monitored by the chemical supplier who will make production aware of any abnormal usage.	Chemical suppliers, employees, Department Manager	This is on-going	2	2	4	AC	PML 36, PML 37	
12	Spill not reported	Pollution of surface water and ground	Environment, Employees	3	4	12	Spill training is undertaken on site for all relevant employees. There is also a spill work instruction in place- HSE WI 005. Any spill/environmental incident that occurs on site must be reported on a HSE RISK 001 form and distributed to site via the incident e-mail address. This is logged on HSE REG 002 and investigated.	Employees, Environmental Manager, Department Manager	This is on-going	2	2	4	AC	HSE RISK 001, HSE WI 005, HSE REG 002	
13	Spill reported but no action taken	Pollution of surface water and ground	Environment, Employees	3	3	9	Any spill/environmental incident that occurs on site must be reported on a HSE RISK 001 form and distributed to site via the incident e-mail address. This is logged on HSE REG 002 and investigated.	Environmental Manager, H&S Manager, Department Manager	This is on-going	1	2	2	AC	HSE RISK 001, HSE REG 002	

14	Monitoring not undertaken as part of IED	The worsening of soil and groundwater conditions due to inadequate monitoring causing environmental damage. This could lead to high remediation costs and enforcement action	Company Environment	4	2	8	The last monitoring soil and groundwater sampling that took place at Intertissue was in 2002 as part of the permit application. This established baseline data. This data has not been updated. At the time no issues were identified in terms of the condition of the site considering it was a brown field site which had been fully remediated. Intertissue has good control measures on site to prevent any contamination of groundwater or soil. This includes incident reporting, investigation into the root cause of incidents, correct and adequate bunding of all hazardous substances on site, maintenance and the evaluation of all chemicals that arrive on site. Where possible Intertissue will substitute or eliminate the use of hazardous products.	Environmental Manager	This must be completed every 5 years for groundwater and 10 years for soil	3	2	6	AC, E, S, E	IPPC Permit Application for Baseline Data
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Date Approved: 23.03.15