



Environmental Emergency Procedure

1. SCOPE & Purpose

This procedure applies to JEMS Environmental Operations and covers activity at the First Milk Effluent Treatment Plant (ETP) in Merlin's Bridge, Haverfordwest:

- Reporting Procedures in the event of a spillage at the facility
- Use of spill kits
- Spillage of chemicals in storage areas
- Non-liquid emissions
- Drains
- Emergencies

To highlight what steps must be taken in the event of a major spillage, release, or emission of any polluting material at any facility operated by JEMS Environmental in this case the First Milk ETP

2. Responsibilities

RESPONSIBILITIES	
JOB TITLE	RESPONSIBILITIES
Managing Director	• Ensures responsibilities are clearly set for all key staff members • Ensures all products are recorded on the site product inventory, and MSDS are in place to understand what to do in an incident • Ensures all MSDS are up to date and kept on file • Ensures all key staff members are aware of the emergency response plans for the facility • Ensures all equipment for dealing with emergencies is part of a suitable review and replacement process • Ensure that all staff are aware of the reporting process to First Milk in order to remain compliant with client obligations and the requirements of the permit
Site Lead	• Ensure all processes and products are risk assessed according to environmental impact • Ensures any control measures coming from the risk assessment process are implemented and continually reviewed for suitability.
All Staff	• Must report incidents • Must work to the requirements of the EMS • Must ensure products are used in the correct manor

3. **Reporting requirements**

All employees will report and record any leakage, spillage, incident, or accident. Additional care and attention will be paid to:

- Holding and storage tanks
- ETP Lanes and DAF
- Chemical drums or containers
- Any pipework on site
- Delivery and collection vehicles

Any event which may have or could have an impact on the environment i.e., not contained within the First Milk ETP bunded area will be notified to the First Milk responsible person immediately.

Any event which leads to, or could lead to an event outside of the operational boundary of the ETP will be reported immediately, this includes any potential breach of the permit discharge criteria.

JEMS Environmental will work with First Milk should any reporting be required to external agencies under the permit expectation.

4. **Containment**

Employees of JEMS Environmental will only try to contain any discharge/leak if it is safe to do so and only whilst wearing appropriate PPE.

Every effort possible must be made to contain the spillage using the spillage kits provided (see instruction for use of Spill kits below)

If it is impossible, or unsafe to stop the discharge or contain the liquid, ensure that it is directed towards a safe area away from any potential route to a receptor by using spillage booms, sand barriers, barriers made from flexible pipe work or any other suitable material available. It may also be possible to transfer spillage, i.e., transfer of chemical from one drum to another.

PPE must be worn when dealing with chemical spillages. The type of spillage being dealt with will dictate the type of PPE required. Material safety data sheets (MSDS) must be consulted prior to dealing with the spillage; they will contain all relevant information including PPE requirements.

The JEMS Environmental on site team should inform First Milk immediately following any event, First Milk will need to notify Natural Resources Wales of any spillage that may enter any water course, be that Merlin's Brook, or at the final discharge into the River Cleddau.

The Site Lead will inform the Managing Director as soon as the situation has been assessed and an accurate report can be given on the internal report form.



Notification of all spills must be given to the JEMS Environmental HSE Manager who must record all Environmental incidents on the Environmental Incident & Complaints Log.

Once the incident has been resolved, and any corrective or preventative actions carried out the Managing Director will close out the incident.

5 **Spill kits**

INSTRUCTIONS FOR THE USE OF SPILL KITS

Assess the risks involved

The spillage of some chemicals will be less hazardous than others. Those familiar with the chemicals in their workplace will have less difficulty identifying risks. Risks include not only the obvious direct risks to spill responders, but also the risks to other equipment and materials in the area. When in doubt, leave the spill response to someone who knows what to do.

Obtain appropriate personal protective equipment

When uncertain about the level of protection required to respond to a spill, always choose the highest possible level of protection.

Contain the spill

Once properly attired, begin to contain the spread of the spill. Stop the source of the spill to prevent its growth. Stand up drums or shut off valves. If drains are at risk, seal them off with a neoprene drain mat. Prevent the spill from spreading by surrounding it with socks and booms.

Treat the spill if appropriate

If the spill is of a highly reactive chemical, neutralize the chemical activity of the liquid to enhance worker safety and reduce the costs and dangers associated with handling the disposing of these substances.

Absorb the spill

Whether applying neutraliser or absorbing the spill, always work from the outside to the inside. Absorbent socks and booms have a considerable capacity by themselves. Push absorbents along the ground towards the centre of the spill. If the spill is larger than the absorbent capacity of the socks and booms that surround it, use absorbent pillows or sheets to absorb the remaining liquid.

After the clean-up

Ensure that 'Clean up' is complete

Liquids are mobile and can migrate through the small crack and holes to pool in unseen locations. Clear out the area surrounding the spill while still protected by PPE, to ensure that all spilt liquids have been absorbed. Wash the area of the spill, if possible to ensure no residue remains.

Dispose of the spill according to its nature

Often, oil can be wrung out of absorbents and collected for recycling. This minimises the volume and mass of the waste. Collect all waste residues and contaminated absorbents into a suitable container



and label, identifying liquid and characteristics. Dispose of as special waste in accordance with current waste regulations and arrange collection by a license Waste contractor.

Remember – Absorbents do not change the nature or characteristics of the liquid absorbed. Exercise care when handling contaminated absorbents!

Replace used equipment

Where a spill happened once, it can happen again. Replace all equipment used during spill response immediately. Decontaminate or replace all used PPE.

Write a report on the spill

Report what happened to cause the spill, what actions were taken and what recommendations would prevent a spill, or aid in future spill response.

6. **Non-liquid emissions**

Emissions from site during fire, and from combustible fuel driven plant.

Calls received regarding nuisance complaints will be reported to management immediately and all details recorded, according to the procedure for non-conformance and corrective action.

7. **Drains**

In accordance with the Natural Resources Wales guidance all drains that are designed primarily for the use of surface water will be painted blue and any to effluent or trade discharge will be painted red.

In areas that have a strong possibility of a release of a contaminant to drain, the drains should be painted red. These drains should be located in areas in which chemicals are handled such as production, storage, loading and unloading areas, all drains painted red should flow to a containment or treatment location, and should never be directed to a surface water drain.

It should be noted that at the First Milk ETP all drains make-up part of the bunding as such all drains within the ETP treatment and storage areas are diverted to the foul system.

8. **Emergencies**

In the event of a fire, there is a considerable increase in water usage generating from Fire Brigade activities. This water may contain contaminants which can enter the surface water drains if not controlled.

During an emergency, appropriate considerations and actions are taken to prevent pollution, but only when safe to do so.

In the event of a major chemical spillage, the emergency response is provided by an external specialist, who can be contacted on:

020 3981 4371 or 07900 241 364

9. **Emergency testing procedure**

This procedure will be tested on at least an annual basis.

The significant areas to be covered are chemical storage and chemical unloading points. Each of these areas should be routinely tested and training records kept for the personnel involved. The records of these tests are kept in the audit file and any action that is required is documented and closed out.

Findings of each of the Emergency Procedure tests are reported in the Management Reviews.

Document Title	Document No.	Rev	Reason for review	Date of issue	Issued by	Approved by
Environmental Emergency Procedure	EP21	1	New Document	07.02.2022	Simon Matthews	Shaun Jones
Environmental Emergency Procedure	EP21	2	Reviewed for ETP operations	07.07.2022	Simon Matthews	Shaun Jones

Issue	Risk Assessment High / Medium / Low	Prevention Measures	Mitigation Measures
Spillage of ETP fluids, chemicals, sludge etc. .	Medium	- Training (Transport & Handling of Chemicals) - Segregation of chemicals and limited access - Bund measures on chemical storage units/sheds. - Audit during which maintenance records are measured. - All ETP drains sent to foul creating a bunded area within the facility	- Spillage kits - Training
Chemical Storage	Medium	- Ensure that all storage facilities are suitable for purpose. - All stores to be clearly signed. - All stores to be kept locked when not in use. - All stores to be inspected at least weekly and documented on fabrication audit, - Segregation of acids and caustics must be adhered to.	- Bunded stores - Spillage Kits - Training
Despatch of Products	Medium	- All products are despatched in specific yard area which is fully washable to a drain that goes through the interceptor. - Approval of third party haulage and continual monitoring - All FLT's used are checked daily and weekly by the Warehouse Manager	- Spillage kits - Training - Increase inspection/ monitoring procedures
Fire at ETP	Low	- Storage of Chemicals. - No smoking policy in operational areas (smoking area provided).	- Fire alarm (regularly checked) - Fire drill procedures

			- Fire extinguishers - Emergency Contact Numbers held in ETP for JEMS Environmental key staff, and First Milk key Staff
Flood	Low	- Maintenance of Drains - Maintenance of Water pipes	
Vandalism	Low	- Operate stringent security strategy (coded security gates, CCTV etc) - Communicate the emergency contact details in the event of an emergency. - Access is controlled to key site areas, with access control in place on all doors into the ETP and external buildings	Emergency contact details for Natural Resources Wales: 24 hour incident report helpline 0300 065 3000