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Environmental Management Toolkit

**Management Toolkit for Operators Holding a Permit to
Discharge Land Enzyme Treated Sheep Dip to Land**

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Management Toolkit for Operators Holding a Permit to Discharge Land Enzyme Treated Sheep Dip to Land

This is an example Environmental Management System. You do not have to use this but it is designed to help you meet the requirements of permit condition 1 relating to management. It will need to be modified to suit your site as some parts won't be relevant to your operation and you may need to make some additions. A copy of this document should be held along with a copy of your permit at a place where it is easily accessible to site operatives; ideally this will be on site.

All sheep dip compounds are very toxic and incredibly small amounts will kill fish and other water life for a very long way downstream if they get into surface waters. Small quantities can also be very damaging to groundwater and can affect drinking supplies, including neighbour's private supplies. If sheep dip is discharged to land in an uncontrolled manner it can lead to contamination of that land. Whilst enzyme treated sheep dip is much safer for disposal to the environment it still contains pollutants and must be handled and disposed of with care.

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for recording complaints about your site from members of the public.
7. **Accident and incident records.**
8. **Accident management plan, including;**
 - A Site plan
 - B Preventing accidents and what to do if they happen.
 - C Key site and emergency contacts

1. Maintenance/Operations Checklist

(Groundwater authorisation site)

Item	How often (tick the appropriate box)						Where are the maintenance instructions?
	Day	Week	Month	Year	Prior to dipping	Post dipping	
Check the weather forecast prior to dipping and don't dip if rain is likely within 24 hours.					✓		
You must check dipping bath for cracks, holes and leaks. Do this by filling the bath with clean water, leave overnight and if the water level is unchanged add dip concentrate ready for dipping operations. If the water level has fallen overnight, leaks must be located and permanently sealed before any dipping is done.					✓		
If you have a drain hole in the dipping bath ensure this is permanently blocked.					✓		
Inspect the draining pens for potential leaks, cracks, holes etc. Seal any that are found.					✓		
Ensure all maps are kept up to date with details of surface waters; springs, boreholes and other vulnerable groundwater so dipping activities are kept away from these sensitive areas.				✓			
Ensure that the drainage pens direct drainage back into the dipping bath and that they can hold the sheep until any liquid has stopped dripping from their fleeces. (minimum of ten minutes)					✓		
Ensure you are using the correct product for the job. Plunge dips are not authorised for use in showers, jetters and other similar equipment					✓		

Ensure that operatives who will be in contact with the dip haven't been advised by their doctors not to work with compounds containing organophosphate (OP) chemicals.					✓		
Ensure records of discharge of dip are kept to ensure compliance with your permit.						✓	

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Ensure all pipes and transportation equipment e.g. vacuum tankers are free from leaks.					✓		
Ensure appropriate Personal Protective Equipment is available for workers involved with the dipping. For example, non-lined synthetic rubber gloves, face shield, wellington boots and so on.					✓		
If spreading conditions are unsuitable or if any other factors are present which may prevent the prompt disposal of used dip it must not be stored in the dipping bath. It must be stored carefully in impermeable containers designed to store such toxic materials. These containers must then be stored so that any spillage cannot enter any drain or run over adjoining land, or banded to contain any unforeseen spillage.						✓	
Ensure dipping bath is covered after each use.						✓	
Add appropriate items for your site							

For further information refer to the *Groundwater Protection Code; Use and disposal of sheep dip compounds, August 2001 (reprinted June 2006)*, this can be downloaded from the DEFRA website

For more information on health and safety whilst dipping sheep look on the Health and Safety Executive's website for the document titled *Sheep Dipping, Advice for Farmers and Others Involved in Dipping Sheep*.

2. Maintenance Record

You need to keep a record of the checks you have completed, that are set out in your checklist, along with any additional checks you have made. This could be recorded in a diary or alternatively you could adapt the form below to create a record sheet

If you do them you should enter:

- The check or maintenance job done; •
Who did it;
- The result.

Alternatively you could use these forms. You will have to keep a good supply of them, for each line on your maintenance/operations checklist.

Item: inspect sample point		Due: weekly
Completed on	Completed by	The result
e.g. 27-08-09	Mr A Person	<i>For example, concrete drainage pens are cracked. Fix the cracks before using the dipping bath again.</i>

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3. Record of Discharge to Land of Enzyme Treated Sheep Dip

Site Name:

Groundwater Permit number:

Required Records	Discharge Date	Discharge Date	Disposal Date	Disposal Date
Licensed brand name or chemical composition of dip				
Volume of undiluted used/waste sheep dip to be treated				
Spreading equipment used				
Quantities of Landguard OP-A added to used sheep dip to facilitate effective treatment.				
What are you using to dilute the substance? (For example, slurry or water)				
Volume of water or slurry added to the dip after treatment with Landguard OP-A enzyme				

Application rate of treated sheep dip to land. In m ³ /ha (gallons/acre)				
Location of disposal area, either indicate field numbers or national grid reference.				
Area of discharge.				

You must also keep dated receipts showing Landguard OP-A purchase

4 - List of Substances and Storage Facilities

The following is a list of liquids, powders and so on that are stored on site and could be harmful to the environment if they escape.

Material	Maximum Quantity	Type and size of storage	Type and size of Secondary Containment
<i>Sheep dip e.g. Coopers Ectoforce.</i>	<i>10 litres</i>	<i>Farm Chemical Store constructed in accordance with HSE Agriculture Information Sheet A/S16</i>	<i>Bund integral to chemical store</i>
<i>Pesticides</i>			

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For more information on farm chemical stores look on the Health and Safety Executive's website for their document titled *Guidance on storing pesticides for farmers and other professional users*.

5. Training Requirements

Make sure everyone involved in sheep dipping has been trained in personal health and safety, animal welfare and environmental impacts.

TRAINING REQUIRED (tick boxes to show who needs which training)									
JOB	Environmental awareness					Maintenance/operations		Accidents and emergency	
	Certificate of Competence in the safe use of sheep dip	Safe disposal of sheep dip	Permit allowing disposal of spent dip is still valid	Check weather forecasts for rain	Awareness of vulnerable areas map	Dipping bath and drainage area maintenance	Livestock holding period during dipping	Fire procedure	Spill response procedure
Farmer /site manager	✓	✓	✓	✓	✓		✓	✓	✓
Farm help		✓		✓		✓	✓	✓	✓

5.1 Training Record

Use this form to record any training you, or (if relevant) your staff, receive relating to the dipping of sheep

Employee Name	Job Title
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Training Required	Date due	Date done	Passed as competent ? yes/no	Reviewers Signature	Date for Refresher	Comments

6. Complaints Record

Who made the complaint? Name:	
Address	
Phone No	
Date and time they made the complaint	
What happened, what was it about?	
Was anyone else aware of this – other neighbours or your staff? If so who?	
Assuming the complaint relates to your site, what was the problem, what went wrong?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: odour or spillage of polluting liquids onto the ground into a drain or a watercourse?	

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If there was then you must notify the Natural Resources Wales on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable At what time did you phone? EA incident number?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No/not applicable
Please print your name and sign:	

Continue on a separate sheet if you do not have enough room.

Keep the completed form in the file to discuss with Natural Resources Wales when they visit.

7. Accident and Incident Recording Form

Record of accidents, other incidents or near misses

This form is to be used for reporting things that could impact on the environment, for example: spillage of polluting liquids onto the ground, into a drain or a watercourse.

"Other incidents" covers impacts on the environment that are not accidents, such as failing to empty the dipping bath and it being filled up by rain and over flowing causing an uncontrolled release of a list 1 substance to ground.

It is good practice to record near misses – for example, there was a leak in one of the sheep dip containers but it was stored in an approved steel cabinet so all the dip was captured.

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	

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<p>What caused it? If you can't find the source of the problem you should contact a suitably qualified person to do so and record who this was, and what the problem was.</p>	
<p>How did you fix the problem and what have you done to make sure that it does not happen again?</p>	
<p>Was there any significant pollution – for example: spillage of polluting liquids onto the ground, into a drain or a watercourse? If so what?</p>	
<p>If there was then you must notify Natural Resources Wales on 0300 065 3000 ASAP. Have you done so?</p>	<p>Yes/No/not applicable At what time did you phone? EA incident number?</p>
<p>Please print your name and sign</p>	

Continue on a separate sheet if you do not have enough room.

Keep the completed form in the file to discuss with Natural Resources Wales when they visit.

8. Accident management plan

Created

by: _____ **Date:** _____

Accident Management Plan Contents

A– Site plan

B– Key site and emergency contacts **C** – Preventing accidents... and what to do if they happen.

A – Site Plan

Insert site plan showing location of the following items:

- ⌚ **Site entrances and exits** available to the emergency services and maintenance contractors
- ⌚ **Buildings**; the buildings and other main constructions, including dipping bath
- ⌚ **Drainage**; including ○ foul drainage (marked in red), ○ surface water drainage (marked in blue)

showing

- ⌚ **Accident and emergency response items**; such as fire extinguishers, spill kits, sand bags, alarms, first aid kit and so on.
- ⌚ **Vulnerable receptors**; on site or adjacent receptors that could be affected by the site operations, such as watercourses, springs, boreholes, ecologically sensitive sites, residential properties and so on.

B - Preventing Accidents and Incidents and what to do if they happen.

The following table contains some of the potential environmental risks relating to a registered facility with a permit to discharge enzyme treated dip. It is not exhaustive so you should also consider if there is anything particular to your site that could cause a problem. Read the table thoroughly. Some points may not apply to your activity and please add any site specific issues to the list. The table also describes what you ought to be doing to reduce the risk of an accident and what should be done if one actually occurs.

Please ensure that you are committed to the table's contents as it forms part of your Environmental Management System which is a condition of your permit and therefore must be complied with.

You will need to develop a spill response procedure to ensure that any spillages are dealt with correctly. This should be attached to this document. Please ensure spill kits and any other equipment referred to is readily available.

Finally make sure that any contractors or farm workers know about the plan, where to find it, and what it contains. It is important that they know how to prevent accidents and what to do should an accident occur. Remember, if an accident does happen, follow the plan in this table.

You may need to review this accident management plan following an incident, accident, or if Natural Resources Wales asks you to do so.

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Possible accident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
Spillages			
Spillage during transfer, of the sheep dip to the farm	Contamination of land, drains, groundwater and watercourses.	Ensure dip and other chemicals are transported in a drip tray or similar container large enough to hold spillages and secured to avoid tipping.	<p>Follow the spill response procedure.</p> <p>It describes what to do in the event of a spill and where the kit is kept.</p> <p>Environmental pollution must be reported to the Natural Resources Wales</p>
Spillage of dip during storage before use.		<p>Ensure that the sheep dip concentrate storage area is of sound construction, is well maintained and located where it is unlikely to be damaged by vehicles.</p> <p>Ensure dip is stored away from drains and in a secure tray or bund to contain any spillage</p> <p>Store dip concentrate in a properly constructed farm chemical store or approved steel cabinet in accordance with HSE</p>	

Possible accident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
		<p>Agriculture Information Sheet A/S16</p> <p>If spillages occur soak them up with an absorbent material and dispose of through a registered waste carrier.</p>	
Just dipped sheep escaping from the holding pen and running through watercourses, over boreholes, springs and so on.		Ensure fencing is adequate so sheep cannot escape.	

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Overfilling			
Spillages of dip when transferring to a slurry tanker or vacuum tanker prior to spreading	Contamination of land, drains, groundwater and watercourses	Ensure the tanker is filled with either water or slurry before adding the spent dip. Ensure that you know the capacity of the tanker and that all pipes used to transfer the dip from the bath to the tanker are free of leaks.	Spill response procedure as described above
Failure of Plant or Equipment			
Leakages; due to faulty pipe work, holes in the dipping bath and so on.	Contamination of land, drains, groundwater and watercourses.	Visual inspection of the dipping bath, pipe work and vacuum tanker, slurry tanker prior to use. Testing of the integrity of the dipping bath and pipe work by running water through them prior to dip and completion of inspection checklist. Preventative maintenance regime.	Spill response procedure as described above.
Possible accident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens

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Inappropriate conditions			
Spreading dip onto frozen, waterlogged or cracked land	Runoff of dip into local water courses or pollution of groundwater	Dip must only be spread onto land which is in an appropriate condition to receive it. In the event of unsuitable spreading conditions store the dip securely in an appropriate container until spreading can occur	

The spaces in the table have been left for you to fill in any other potential accidents or incidents which may occur.

Pollution Prevention Guideline number 21 which can be on our website contains information on how to produce an incident response plan to deal with an environmental incident on your site.

A code of good agricultural practice for farmers, growers and land managers (COGAP) also provides advice on pesticide use

MAGIC is a web based interactive map service to bring together environmental information from across government. It will be useful in finding local sensitive sites.

C – Key Site and Emergency Contacts

This table contains information and contacts you may need in an emergency (adjust to suit your site).

SITE DETAILS		
Location:		
Postcode:		
Site Access Grid Reference:		
SITE CONTACTS	Office Hours (specify)	Out of hours
Owner:		
Farm Manager:		
Tenant:		
EMERGENCY SERVICES	Office Hours	Out of hours
Emergency	999	999
Medical:		
Police:		
Fire:		
REGULATORS	Office Hours	Out of hours
Health and Safety Executive (HSE)		
Local Authority:		
Natural Resources Wales (Local)		
EA (24 hour emergency hotline)	0800 80 70 60	0800 80 70 60
Natural England/CCW		
UTILITY AND KEY SERVICES	Office Hours	Out of hours
Pesticide use advisor		
OTHER KEY CONTACTS	Office Hours	Out of hours
Adjacent landowners:		
Neighbours:		
Specialist advisors:		

