

ENVIRONMENTAL PLAN

Spillage Management Plan

EP – 03

1. PURPOSE

To ensure that emergency planning is in place to reducing risk of incidents and to minimise the risk of harm to employees, third parties and the environment.

2. SCOPE

This Management Plan provides guidance on the appropriate preparation for, and response to, foreseeable incidents arising from Natural UK's Healthcare Waste Management Facility (HWMF) activities. Natural UK Ltd acknowledges its legal duties to control and manage any harmful emissions that could arise as part of its day to day activities under part III of the Environmental Protection Act 1990, in respect of statutory nuisances.

3. RESPONSIBILITIES

The following personnel hold primary responsibility for ensuring that the requirements of this procedure are met.

General responsibilities are summarised below:

Action	Responsibility
Ensuring that environmental response plans and equipment are in place on site.	Managing Directors Technically Competent Manager
Ensuring that staff have received appropriate training	Managing Directors Technically Competent Manager
Support and liaison	Managing Directors Technically Competent Manager
Completion of Weekly Environmental Checks	Operations Supervisor
Prompt reporting of environmental incidents	All
Reviewing environmental incidents for learning points	Managing Directors Technically Competent Manager

In certain instances, designated personnel may deputise for the Managing Director and or the Technically Competent Manager. In general, these deputies should operate within the same organisational functions as those with primary responsibility for the activity concerned. Natural UK, Natural Healthcare, NappiCycle staff frequently work on other companies sites and locations all staff must comply with those sites regulations and procedures all of the time.

4. REFERENCES

QMS -01 Working Plan

QMS -06 Non-Conformance Reporting

QMS -11 Health & Safety

QMS -14 Management Systems Review

EP -09 Emergency & Incident Response Plan

Weekly Environmental Inspection Report

5. INCIDENT PREPAREDNESS

The Technically Competent Manager (TCM) is responsible for ensuring that adequate preparation has been made both to minimise the risk of incidents and to allow adequate emergency response. These measures shall include:

Periodic review to ensure that response capability is at the desired level.

The TCM will use the results of this exercise to identify requirements (training, equipment, etc) for the site. These requirements will be communicated to Management, who will put them in place, with the assistance of the Health and Safety Manager as required. Sighting of any emergency equipment will take into account the most likely areas of its use on site, security and ease of access in emergency.

The TCM shall set up an Emergency Plan including organisation and responsibilities, general precautions, liaison with the emergency services, detection systems (where relevant) and environmental training.

Emergency call out numbers will be clearly displayed on each site. These will include:

- **Technically Competent Manager**
- **Health & Safety Manager**
- **Managing Directors**
- **The Natural Resources Wales (NRW)**
- **Health & Safety Executive**
- **Police Service**
- **Fire Service**
- **Ambulance Service**
- **First Aider(s)**
- **Spill Response contractor (if applicable)**

6. SPILL MANAGEMENT PROCEDURE

Many different materials can cause environmental harm if they're spilt and enter the environment. It's better to stop a spill happening than to have to clean up afterwards. Natural UK will consider procedures and security to protect the business and reduce the risk of a spill. Polluting materials include things we can clearly identify as harmful, such as chemicals, pesticides, oils, sewage and animal slurries. But many things we don't see as harmful can still have a devastating effect on the environment, for example beverages, food products, detergents, dairy products, paint and ink. Impacts can include: the closure of public water supplies and other abstractions, both surface water and ground water; damage to wetland habitats, fisheries and river ecosystem; disruption of recreational and other river uses; groundwater contamination: land contamination; risk to and impacts on human health from air pollution. These impacts can be immediate and long lasting, but sometimes the effect can take longer to be recognised, especially if groundwater has been polluted. If you're the polluter, you're likely to be responsible for the clean-up costs, even where the pollution was caused by vandalism. These can be expensive, particularly if groundwater has been contaminated. There may also be additional costs associated with spills such as fines/court costs etc.

7. HOW SPILLS CAN OCCUR

Spills often happen when least expected. Causes can include:

- Over filling or poor handling of storage containers, for example drums, IBC's and tanks.
- Damaged or leaking storage containers.
- Equipment and containment failure.
- Failure of underground tanks and pipe work.
- A collision or accident during transport or delivery.
- Weather related problems such as flooding, high wind damage or extreme temperatures.
- Fires or explosions.
- Deliberate acts.

8. HOW A SPILL CAN ESCAPE FROM SITE

Pollutants can escape from site in a number of ways, or from a spill offsite via different routes:

- Through the surface water drain system
- Direct run off into a water course
- Through the soil via soakaways, drains or damaged surfaces to ground water.
- Through the foul sewer system, where pollutants may discharge through storm overflows to surface waters, could pass through the sewage treatment works affecting its efficiency etc.

9. POLLUTION CONTROL HIERARCHY

The Pollution Control Hierarchy is fundamental to planning proper controls for spillage response and will help identify suitable pollution prevention equipment. The list below highlights the preferred order of response.

- Contain at source
- Contain close to source
- Contain on the surface
- Contain in the drainage system
- Contain on the water course

10. GENERAL SPILL PROCEDURE

Training

All employees shall have general spill procedure training and environmental awareness training with specialised environmental training being provided for employees undertaking particular identified activities. This may include both written material and training courses provided in house or by external contractors. Training will cover: where spills could occur; how spills can pollute; and where safe to do so the best way to tackle certain spillages. Where it is deemed unsafe they will be familiar with the key site & emergency contacts list. Staff will also be made familiar with procedures to make the site safe and prevent further pollution in the case of an emergency.

Storage

- All wastes should be appropriately stored on site in accordance with the waste procedure (See Working Plan).
- Responsible Managers are responsible for ensuring that materials used on their sites are adequately stored in order to prevent accidental spillage and release.
- All oils and fuels in containers over 200 litres are to be stored in or on bunded containment in accordance with General Pollution Prevention Guidance (GPP2) "Above ground oil storage tanks"

- All oils, fuels and chemicals in containers up to 1000 litres are to be stored in or on bunded containment in accordance with General Pollution Prevention Guidance (GPP26) " Safe storage of drums and intermediate bulk containers (IBCs)
- Regular (minimum weekly) site environmental checks and inspections maintenance to include bunds and drains and condition of containers.
- All containers and UN approved packaging and should be used in accordance with instructions.
- Wastes to be kept in locked containers with bung seal at all times.
- All wastes should be stored in sealed suitable containers or within specified storage bays with impermeable surface.
- Sealed containers to be stored upright ensuring lids are properly fitted.
- Any complaints or waste handling not conforming to the above should be reported to the Responsible Manager as a matter of priority.

Pollution Control Equipment

Natural UK and NappiCycle will ensure the site has adequate stocks of pollution control equipment. Its suitability will be determined by risk assessment and be made readily available and where possible stored in areas deemed necessary in that risk assessment. The following items will be marked up on a Site Plan

AHP Treatment Process (NappiCycle)

- Emergency oil spill kit located in 240 litre wheelie bin
- Emergency chemical spill kit in 240 litre wheelie bin
- Emergency drain covers & bags of absorbent granules
- Emergency Spill kits will contain: a selection of absorbent pads, socks and booms; selection of Disposable PPE (gloves, overalls, goggles, face masks) and; heavy duty clear plastic bags and cable ties
- First aid kit mounted on wall including eye wash
- COSHH Folder located in office
- Quarantine bin for spill residue bin.
- For major incident such as tank or plant failure (See procedure below).

Hazardous Waste Transfer Station

- Emergency chemical spill kit in 240 litre wheelie bin
- Emergency Spill kits will contain: a selection of absorbent pads, socks and booms; selection of Disposable PPE (gloves, overalls, goggles, face masks) and; heavy duty clear plastic bags and cable ties
- First aid kit mounted on wall including eye wash
- Disinfecting Spray located in spill kit locker
- COSHH Folder located in office
- Quarantine bin for spill residue bin.
- For major incident such as tank or plant failure (See procedure below).

Main Warehouse

- Emergency oil spill kit located in 240 litre wheelie bin
- Emergency chemical spill kit in 240 litre wheelie bin
- Emergency drain covers & bags of absorbent granules
- Emergency Spill kits will contain: a selection of absorbent pads, socks and booms; selection of Disposable PPE (gloves, overalls, goggles, face masks) and; heavy duty orange plastic bags and cable ties
- First aid kit mounted on wall including eye wash
- COSHH Folder located in office

- Disinfecting Spray located in spill kit locker
- Quarantine bin for spill residue bin.
- For major incident such as tank or plant failure (See procedure below).

Procedure for blood spillages (Reference Hazardous Waste Transfer Station)

Blood spillages or leaks must be dealt with as a matter of priority. It must be assumed that and dealt with in a way that any other hazardous waste stream is dealt with on site due to the potential for infection. This is likely to occur on certain waste streams which are known to the persons handling the waste i.e. hospitals. Should blood contaminate any surface approach with caution, ensure the correct PPE is employed such as, disposable gloves, goggles, disposable overalls. The emergency spill kit can then be employed to deal with the area the spill has occurred. Do not just transfer the orange bag directly into another receptacle as this will just increase the area likely to be contaminated with blood. Double bag where possible and store upright and inform management of your action. So they can raise the issue with the source of the waste. All absorbents and residues should then be placed in to an orange bag and treated earmarked for incineration. After the spill is absorbed the area can then be disinfected using spray cleaner located in spill cupboard.

Procedure for oil spillages (Whole Site)

Oil spillages may occur and again should be dealt with immediately. If possible stop at source if not possible containment is crucial. Drain covers are located throughout. If there is a danger of the spillage contaminating nearby drains employ drain covers as necessary according to instruction contained within the covers themselves. The emergency oil spill kit can be employed to deal with oil. Oil soaked absorbents and granules should be placed in clear plastic bags sealed and stored in Quarantine box until arrangements can be made for disposal via specialist hazardous waste contractor.

Foul water from Process Tanks & Equipment (NappiCycle)

Small spillages should be cleaned up immediately as part of the good housekeeping practices using existing surface water interceptor or spill channels where available that drain to foul sewer. Where surface spill channels are not easily accessible then absorbent granules can be used to soak up free liquids. This waste should then be bagged and disposed of appropriately. Spill channels are there to act as protection against spillage. In the unlikely event of a large scale spillage or rupture of a tank there are a number of features used to contain spillage. The impermeable concrete floor area and spill channels below the main process area act as the primary containment allowing liquids to quickly drain to the foul sewer. In the unlikely event that spillage reaches the perimeter walls of the building an in situ concrete block bund should prevent any spillage from exiting the perimeter boundary. If the spillage reaches any of the access doors absorbent booms and granules from the emergency spill kits can be used to form a temporary bund. Pumps can be utilised to pump spilled waste water into intermediate bulk containers (IBC's). Drain covers are also available to prevent spillage entering any surface water drains. Spade valves have been installed on the effluent discharge to shut off the discharge to foul sewer should that be required. The site has a permitted trade effluent discharge consent of up to 5m³ per day.

Chemical spills

All chemicals used in the process or for cleaning purposes should be stored within bunded containment in accordance with GPP 26 guidance. Chemical spillages that occur should be dealt with immediately. If possible and it is safe to do so stop further spillage at source. Before tackling a chemical spill ensure that full PPE is worn and identify the chemical. Material data sheets for all chemicals and are kept on file and form part of COSHH training and COSHH procedure. If there is a danger of the spillage contaminating nearby drains employ drain covers as necessary according to instruction contained within the covers themselves. Chemical spill kits can be employed to deal with chemicals. Residues should be disposed of via specialist contractor using the relevant Hazardous Waste Consignment notes. Contact numbers for

disposal of oil residues, oil soaked granules and oil rags can be located in the Emergency Plan and Key contacts list.

11. RECORDS

All incidents raised must be recorded and reported to the Responsible Manager to enable the causes to be investigated and to undergo a root cause analysis. This should ensure the likelihood of a re - occurrence is minimised. Records shall be kept on an incident response form and kept on file.

Weekly Environmental Inspection will be carried out by the Responsible Manager, documented and filed. Issues raised may require remedial actions and these can be documented on this form. The form should be reviewed and countersigned by the TCM or Managing Directors when the issues have been actioned or resolved.