

IRMP Steering Group Integrated Risk Management Planning: Policy Guidance

Environmental Protection



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Environmental Protection

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Contents

Section 1: Introduction	5
Section 2: Scope	6
Section 3: Risk Analysis	7
Section 4: Strategies	9
Section 5: Delivery Mechanisms	10
Section 6: Monitoring and Reviewing	13
Annex A: Relevant legislation	14
Annex B: Corporate social responsibility	17
Annex C: National policy and other relevant IRMP guidance	18
Annex D: Local policy	21
Annex E: Glossary of terms	22
Annex F: Example Operational Incident Plan	23
Annex G: Cumbria Emergency Environmental Protection Group	28

Document Status

This guidance has been published by Communities and Local Government on behalf of the IRMP Steering Group.

Representatives on the Steering Group include the Chairs of the Practitioners and Business and Community Safety Fora, Chief Fire Officers Association (CFOA), Confederation of British Industry, Health and Safety Executive, Local Government Association, Fire Protection Association, and the three main uniformed representative bodies as well as other key stakeholders from the “fire industry”.

Communities and Local Government are of the view that an Integrated Risk Management Plan (IRMP) is best produced and implemented at a local level based upon local needs, but consider that these chapters of policy guidance will assist in ensuring a consistency in approach and quality in the way that IRMPs are produced. For the avoidance of doubt this guidance is not mandatory and has been made available for Fire and Rescue Authorities (FRAs) to use, should they wish to, in the development of themed areas of IRMP.

Section 1

Introduction

- 1.1 Fire and Rescue Authorities (FRAs) are required by the National Framework to produce a local IRMP that sets out the authority's strategy, in collaboration with other agencies, for reducing the commercial, economic and social impact of fires and other emergency incidents.
- 1.2 Paragraph 1.6 of the National Framework 2008-2011 requires each FRA to produce a publicly available IRMP covering at least a three-year time span which, amongst other things:
 - is regularly reviewed and revised and reflects up to date risk information and evaluation of service delivery outcomes
 - demonstrates how prevention, protection and response activities will be best used to mitigate the impact of risk on communities in a cost effective way
 - provides details of how FRAs deliver their objectives and meet the needs of communities through working with partners.

The National Framework for the FRS 2008-11 is available on the internet at:
www.communities.gov.uk/publications/fire/nationalframework200811

- 1.3 Whilst FRAs have a legal responsibility to ensure that effective arrangements are in place to deal with an incident that could adversely affect the natural environment through both planning and response, a moral responsibility also exists to ensure that the quality of life of the public is improved through the concept of sustainable development.
- 1.4 The protection of the environment by the development of pollution prevention and control is seen as a core function in an IRMP that is designed to improve the safety of the community.

Section 2

Scope

Legislation

- 2.1 The key legislation which FRAs will need to take account of in considering how to incorporate environmental matters in their IRMP strategy are:
1. *The Fire and Rescue Services Act 2004*
 2. *The Regulatory Reform (Fire Safety) Order 2005*
 3. *The Civil Contingencies Act 2004*
 4. *The Water Resources Act 1991*
- 2.2 Further detail on the relevant aspects of the legislation cited is at Annex A. In considering how to include environmental strategy needs in the IRMP process FRAs will also need to take account of corporate social responsibility (see Annex B) and national and local policy (Annexes C and D).

Section 3

Risk Analysis

- 3.1 In the emergency and non-emergency phases of an incident, Fire and Rescue Service (FRS) intervention can significantly reduce the impact that spillages or firewater run-off containing environmentally damaging materials may have on the environment. Such actions can also provide significant public health benefits. Public drinking water is drawn from rivers, lakes, lochs and groundwater. FRS activities to protect these waters will help safeguard public drinking water supplies and consequently public health, thereby fulfilling the duties under Section 7(1)(b) of the FRS Act 2004.
- 3.2 Non-fire incidents, such as flooding, may also result in environmental impact from a site which the FRS may be able to work with those responsible for the risk and other partners to mitigate.
- 3.3 FRS pollution prevention and control activities can therefore be associated with the FRS stated aim of protecting public safety. This philosophy should be borne in mind when prioritising environmental protection as an objective within the FRA's strategic, systematic and dynamic risk assessment process.
- 3.4 There are also significant cost benefits to the UK when FRS personnel implement first aid measures such as sealing a leak, blocking a drain or using a 'controlled burn' strategy. It is quite simply more expensive to clean up pollution from the environment than from a reservoir of containment provided by the service.
- 3.5 Figures from the Environment Agency indicate that:
 - The Environment Agency attends an estimated 39 per cent fewer incidents as a consequence of FRS attendance. The time saved by the Environment Agency can be used for other important environmental protection work
 - There is a reduction in the severity of pollution incidents attended by the FRS. This can be directly linked to the speed of response that the FRS can achieve
 - The Environment Agency classify incidents utilising a Common Incident Classification Scheme (CICS) methodology ranging from Category 1 which are incidents which have the potential to have a major impact on the environment to Category 4 incidents which have no significant impact on the environment.

Table 1: Impact of the attendance of the FRS on incident severity – proportion of incidents in each CICS category

CICS Category	Overall %	FRS in attendance %
1	0.42	0.36
2	2.4	0.5
3	43.3	28.3
4	53.9	70.6

- The current cost of pollution incidents to the UK economy is estimated at £136million per annum. Although it is not possible to quantify without further study any reduction in this figure due to FRS intervention, the reduction in the severity of incidents highlighted above suggests that this figure is likely to be significant.
- 3.6 Sites of Special Scientific Interest, mines or other natural or industrial legacy sites should be identified and the potential impact an event may have upon these. For SSSI it is recommended that the FRS contacts the Natural England regional director (www.english-nature.org.uk/special/ssi/) to identify a local liaison officer. It is suggested that a useful starting point would be to agree communication and local procedures for Natural Nature Reserves, which are directly managed by Natural England as these represent the most sensitive/ significant sites.
- 3.7 Information on key environmental schemes and designations can also be accessed via the web site Magic which provides a web-based interactive map bringing together geographic information on key environmental schemes and designations in one place:
www.magic.gov.uk/default.htm
- 3.8 Further information on risk analysis for the natural environment is provided in the IRMP Wildfire chapter.

Section 4

Strategies

- 4.1 FRSs attend incidents that have the potential to pollute air, land and water. Water courses and other aquatic environments are considered to be the most vulnerable to pollution from emergency incidents and the aspect of the environment that the FRS can protect most readily. Consequently pollution prevention and control measures in the FRS concentrate primarily on the protection of the aquatic environment with protection of land and air quality being considered to a more limited extent. The development of pollution prevention and control in all areas is, however, seen as a core function in an IRMP that is designed to improve the safety of the community.

Section 5

Delivery Mechanism

5.1 It is recommended that, as part of the IRMP process, FRSs:

- (a) Undertake a review of local working arrangements between the FRS and the Environment Agency in accordance with the LGA/Environment Agency 'Working Better Together, Protocol number 8' on Fire and Rescue Service Issues.
- (b) Establish planning arrangements for incidents that may have an adverse effect upon the environment. Such arrangements would be established in liaison with the Environment Agency and where appropriate, the Highways Agency, Water Undertakers and other professional partners, an example being the HSE at COMAH sites. The arrangements would include plans detailing the specific measures required for sites that constitute a significant risk to the environment in accordance with sections 7(2)(d) and 9(3)(d) of the Fire & Rescue Services Act 2004 and the Civil Contingencies Act 2004. See Annex E. The Environment Agency publishes guidance on pollution prevention and Pollution Prevention Guide (PPG) 21 relates to Incident Response Planning. PPG 21 provides guidance to site operators on how they can produce an incident response plan to prevent and mitigate damage to the environment caused by spillages of hazardous substances and firewater run off. Fire and Rescue Services may find the information contained within PPG 21 useful when preparing 7(2)(d), Operational Incident Plans.
- (c) In order for FRS personnel to deal effectively with incidents that have the potential to pollute the environment, it is essential that they have access to appropriate information regarding;
 - Potential pollution sources
 - The sensitivity and vulnerability of the environment in their station area
 - The pathways that any pollutant will follow before it enters the environment, for example groundwater directly by soakaway, or indirectly via surface water drainage
 - Areas at a site where containment can be effectively undertaken.
- (d) Review operational procedures in order to ensure that they are consistent with the procedures and guidance set out in the FRS manual on Environmental Protection¹.

¹ Due for publication in 2008.

- (e) Develop training strategies in accordance with the environmental competencies described in the Integrated Personal Development System (IPDS) role maps and the FRS Manual on Environmental Protection. A structured approach should be adopted to environmental training that would be delivered centrally, regionally, at FRS training centres and local fire stations and include all FRS roles from Firefighter to Brigade Manager.
- (f) Establish partnership arrangements with other agencies and other FRSs in order to offer the best possible level of service and to share information and co-operate as required by the Civil Contingencies Act 2004.
- (g) Note that the concept of the controlled-burn tactic has developed and involves a restricted or controlled use of water or foam on fires to reduce potential environmental impacts of chemicals and contaminated firewater runoff.
- (h) The Environment Agency publishes guidance on pollution prevention and Pollution Prevention Guide 28 (PPG 28) relates to controlled burn tactics. The guidance details the Environment Agency policy/position on controlled burns and sets out circumstances when it believes a controlled burn may be appropriate.
- (i) Consideration should be given to adopting the recommendations contained within PPG 28, where appropriate, in order to determine the Best Practical Environmental Option (BPEO) for dealing with incidents that have an impact upon the environment.
- (j) Where a controlled burn tactic has been identified in the planning stage as a method for protecting the environment at a particular premises, this information should be included within the plan prepared under Section 7(2)(d) of the FRS Act 2004. This information should also be shared with other Category 1 Responders under the Civil Contingencies Act 2004 and neighbouring FRSs under Section 13 and 16 arrangements made under the FRS Act 2004, where appropriate.
- (k) Closely monitor the use of fire-fighting foam at incidents and for training purposes. FRSs should ensure that foam products are used which are the least damaging to the environment.

Initiatives

5.2 Work already undertaken in this area includes the following:

1. The protocol between the Local Government Association and the EA was agreed in 1999 and has been recently revised and re-issued as Protocol No. 8 in the 'Working Better Together' series. This has resulted in an excellent partnership arrangement between the two agencies.

2. The partnership arrangements are given strategic direction by the National Strategy Group (FRS and Environment Agencies) which is composed of representatives of CFA, the UK Environment Agencies, the Local Government Association, Office of the Chief Fire and Rescue Advisor and its counterpart in Scotland and Wales. The National Operational Group provides support and advice to the Strategic Group.
3. The Environment Agency (EA) has supplied pollution control equipment to FRSs in the form of 'Grab Packs'. The purpose of these packs is to provide equipment on front line fire appliances, thereby enabling rapid intervention in dealing with a variety of spills and leaks.
4. The EA has also funded the provision of more specialised equipment for use at larger incidents. The majority of FRSs carry this equipment on a special appliance, commonly termed an Environmental Protection Unit.
5. Lancashire FRS have developed Operational Incident Plans in conjunction with the EA that include information which will result in a more effective response to incidents at sites for which such plans have been produced (see Annex E).
6. Highways related incidents form the majority of occasions on which grab pack equipment is used. Cumbria FRS, the EA and Amey Mouchel have entered into a joint partnership for dealing with incidents on the county's major trunk roads, including the provision of equipment and joint training and exercising. Amey Mouchel has the responsibility for the motorway network and the majority of trunk roads in Cumbria on behalf of the Highways Agency. This initiative is being developed to include other areas, (see Annex G).

Section 6

Monitoring and Reviewing

- 6.1 Where monitoring and review processes relating to the reduction in pollution due to FRS intervention are not in place, these arrangements should be implemented to evaluate the efficacy of the FRS environment protection strategy.
- 6.2 Within local partnership agreements between the FRS and EA, arrangements should be established to monitor the number of incidents FRS attend at which pollution control measures are instigated. A comparison can be made with incidents that the FRS did not attend and the consequences of implementing pollution control actions can be measured through a cost/benefit analysis.
- 6.3 FRSs should ensure that robust and accurate recording and reporting systems of pollution control activities are in place, which will enable FRSs to quantify the effectiveness of their activities and monitor the type and quantities of equipment used. It is also important that the costs of the equipment are recovered wherever possible from the polluter. An example reporting and recording form is included in the FRS Manual on Environmental Protection.
- 6.4 Such recording systems will allow for accurate recording for central and local government and local communities as well as identifying training needs, where appropriate.
- 6.5 Consideration should be given to the development of a performance management system pertinent to Environmental Protection.

Annex A

Relevant legislation

1. The Fire and Rescue Services (FRS) Act 2004

The Fire and Rescue Services Act, Sections 6 & 7 places the following duties on Fire and Rescue Authorities:

Section 6 Fire Safety

- (1) A fire and rescue authority must make provision for the purpose of promoting fire safety in its area.
- (2) In making provision under subsection (1) a fire and rescue authority must in particular, to the extent that it considers it reasonable to do so, make arrangements for
 - (a) the provision of information, publicity and encouragement in respect of the steps to be taken to prevent fires and death or injury by fire;
 - (b) the giving of advice, on request, about–
 - (i) how to prevent fires and restrict their spread in buildings and other property;
 - (ii) the means of escape from buildings and other property in case of fire.

Section 7 Fire Fighting

- (1) A fire and rescue authority must make provision for the purpose of–
 - (a) extinguishing fires in its area, and
 - (b) protecting life and property in the event of fires in its area.
- (2) In making provision under subsection (1) a fire and rescue authority must in particular–
 - (a) secure the provision of the personnel, services and equipment necessary efficiently to meet all normal requirements;
 - (b) secure the provision of training for personnel;
 - (c) make arrangements for dealing with calls for help and for summoning personnel;
 - (d) make arrangements for obtaining information needed for the purpose mentioned in subsection (1);

(e) make arrangements for ensuring that reasonable steps are taken to prevent or limit damage to property resulting from action taken for the purpose mentioned in subsection (1).

Section 9 of the FRS Act gives the Secretary of State power to confer on a Fire and Rescue Authority functions relating to emergencies, other than fires and road traffic accidents.

Section 11 of the FRS Act gives Fire and Rescue Authorities the power to respond to other eventualities. This includes an event or situation that causes or is likely to cause:

- One or more individuals to die, be injured or become ill
- Harm to the environment (including the life and health of plants and animals)

The Fire and Rescue Services Act 2004 is available on the Internet at:
www.opsi.gov.uk/acts/acts2004/20040021.htm

2. Regulatory Reform (Fire Safety) Order 2005

Extract from Article 12

Elimination or reduction of risks from dangerous substances

(3) Where it is not reasonably practicable to eliminate risk ... the responsible person must, so far as is reasonably practicable, apply measures consistent with the risk assessment and appropriate to the nature of the activity or operation, including the measures specified in Part 4 of Schedule 1 to this Order to

- (a) control the risk, and
- (b) mitigate the detrimental effects of a fire.

Extract from Article 26

(1) Every enforcing authority must enforce the provisions of this Order, and

(2) In performing the duty imposed by paragraph (1), the enforcing authority must have regard to such guidance as the Secretary of State may give it.

3. The Civil Contingencies Act 2004

One of the aims of the Civil Contingencies Act 2004 is to improve the UK's ability to deal with the consequences of major disruptive incidents by improving the planning process at a local level. The definition of an emergency within the act includes "an event or situation which threatens serious damage to the environment".

The definition of an emergency is concerned with consequences rather than with cause or source. A spillage of a single drum containing chemicals into a watercourse in itself may not appear to be an emergency; however should serious damage to the aquatic environment and/or threats to public drinking water ensue, the event would be deemed to be an emergency within the definition of the Act.

The Civil Contingencies Secretariat issue Local Risk Assessment Guidance (LRAG) annually to support Category 1 responders in fulfilling their statutory duty under Section 2 of the Civil Contingencies Act. The classified LRAG provides generic national guidance on non-malicious hazards occurring at a local level which Category 1 responders should consider when maintaining Community Risk Registers. The guidance identifies the hazards that Local Resilience Forums (LRF) may wish to consider in developing their Community Risk Registers. Likelihoods, threats and vulnerabilities are assessed for a five year period so that the risk assessment will support strategic planning for the medium term.

Risks are categorised indicating the type of threat or hazard in question including risks to the environment, for example, major pollution of controlled waters (HL4) and major land contamination (HL5). FRSs should give consideration to the risks identified in their local Community Risk Registers when preparing an IRMP Environmental Protection Strategy.

The Civil Contingencies Act 2004 is available on the Internet at:
www.opsi.gov.uk/acts/acts2004/20040036.htm

4. The Water Resources Act 1991

Discharges into controlled waters are covered by the Water Resources Act 1991.

Section 85 of the Act makes it an offence for a person to cause or knowingly permit any “poisonous, noxious or polluting matter” to enter “controlled waters”, including groundwaters.

Section 89 relates to the statutory defences to the offence of polluting controlled waters as follows:

A person shall not be guilty of an offence under Section 85 if:

- The entry is caused or permitted, or the discharge is made, in any emergency in order to avoid danger to life or health
- That person takes all such steps as are reasonably practicable in the circumstances for minimising the extent of the entry or discharge and of its polluting effects, and
- Particulars of the entry or discharge are furnished to the Authority (Environment Agency) as soon as is reasonably practicable after the entry occurs.

All three criteria must be in place for the defense to apply. The Water Resources Act is available on the Internet at:
www.opsi.gov.uk/ACTS/acts1991/Ukpga_19910057_en_1.htm

It should also be borne in mind that a number of other pieces of environmental legislation may also have relevance to FRS operational activity. These include The Groundwater Regulations, Hazardous Waste Regulations, Pollution Prevention and Control Regulations, COMAH Regulations and Water Framework Directive.

Annex B

Corporate social responsibility

The Government sees CSR as the business contribution to their sustainable development goals. Essentially it is about how business takes account of its economic, social and environmental impacts in the way it operates – maximising the benefits and minimising the downsides. Specifically, government see CSR as the voluntary actions that business can take, over and above compliance with minimum legal requirements, to address both its own competitive interests and the interests of wider society.

It is for the FRA to consider and determine the extent to which CSR applies to the service locally and the extent to which different aspects of service delivery, including those associated with the wider social agenda, discharge that responsibility.

Whilst FRSs have a legal responsibility to ensure that effective arrangements are in place to deal with an incident that could adversely affect the natural environment through both planning and response, a moral responsibility also exists to ensure that the quality of life of the public is improved through sustainable development.

Further information on CSR can be found at www.csr.gov.uk

Annex C

National policy and other relevant IRMP guidance

In addition to the National Framework, FRAs will wish to consider the following:

1. Extant IRMP Guidance notes

Guidance Note 1

Paragraph 1.2 states that the Government thinks that a modern and effective fire and rescue service should serve all sections of our society fairly and equitably by ... safeguarding the environment and heritage (both built and natural).

Guidance Note 4 Fire Authority Integrated Risk Management Planning

Annex A Paragraph 2.2 states: It must be borne in mind that an assessment of the risk in a building, and its subsequent inclusion in a fire safety inspection programme, can be made for a number of reasons other than the legal responsibilities of the fire authority. These could include, at a national or local level:

- the strategic importance of a particular property or business
- the potential loss of heritage
- **potential environmental damage, and**
- **the need to assess likely fire fighting operations.**

The IRMP Guidance Notes are available on the internet at:

www.communities.gov.uk/fire/developingfuture/integratedriskmanagement/

2. Working Better Together Protocol Series Protocol No. 8 Fire and Rescue Service Issues

In 2003, the Local Government Association for England, the Welsh Local Government Association and the Environment Agency agreed and signed a joint agreement, 'Working Better Together'.

Local authorities and the Environment Agency have powers and duties that complement each other in protecting the environment and protecting and enhancing the quality of life for local communities. Working Better Together is designed to ensure a close working partnership exists in order to deliver a series of environmental outcomes.

A series of individual protocols have been formulated one of which, Protocol number 8, relates to Fire and Rescue Service Issues.

The protocol surrounding the partnership between the Environment Agency and Fire and Rescue Services has three sections under Part 1:

- Section 1 describes the aims of the protocol, roles and responsibilities, shared environmental outcomes and the arrangements for joint working between the FRS and the EA
- Section 2 sets out the review arrangements for the protocol
- Section 3 details the areas of mutual interest between the FRS and the EA in 5 separate annexes. These annexes detail the principles, legislation and procedures that must be adopted in relation to these areas of mutual interest, one of which refers to IRMPs/Risk Reduction Plans.

Protocol number 8 is available on the Internet at:

www.communities.gov.uk/pub/679/FRSCircular612006AnnexFireProtocolno8_id1503679.pdf

3. Government Public Service Agreements

Nationally, the Government is committed to deliver various Public Sector Agreement (PSA) targets, attainment of which depends on the control of diffuse pollution. For example, the Government is committed:

- to bring 95 per cent of Sites of Special Scientific Interest (SSSIs) into favourable condition by 2010
- to raise compliance with river quality objectives to 91 per cent (compared to 86 per cent in 1999), and
- to bring about continued improvements in bathing water quality to ensure at least 97 per cent compliance with the mandatory coliform bacteria standards for English bathing waters.

DEFRA will lead two cross-government PSAs in the new CSR period from April 2008, one on Climate Change and the other on the natural Environment.

The titles of these are:

- Secure A Healthy Natural Environment For Today And The Future
- Lead The Global Effort To Avoid Dangerous Climate Change.

Further detail on DEFRA's PSAs for 2008-2011 can be found at:

www.defra.gov.uk/corporate/busplan/spending-review/psa2007.htm

The Water Framework Directive is a particularly important new Directive and will require River Basin Management plans to be developed that ensure 'good status' can be achieved in the UK's river basins by 2015.

To ensure that this is achieved a programme of measures will need to be in place. The partnership could be seen as part of that process particularly where incidents threaten good status. See <http://www.defra.gov.uk/environment/water/wfd/index.htm>

Annex D

Local policy

Local working arrangements have been established between Fire and Rescue Services (FRS's) and the Environment Agency to allow for local flexibility as to how the Protocol No. 8 is implemented.

Regional Liaison Groups can further assist the process and such groups enable co-operation and information sharing as required by the Civil Contingencies Act 2004.

Annex E

Glossary of terms

Term	Definition
BPEO	Best Practical Environmental Option
CCA	Civil Contingencies Act 2004
CFOA	Chief Fire Officers' Association
CICS	Common Incident Classification Scheme
COMAH	Control of Major Accident Hazards Regulations 1999
DEFRA	Department for the Environment, Food and Rural Affairs
EA	Environment Agency
FRA	Fire and Rescue Authority
FRS Act 2004	Fire and Rescue Services Act 2004
FRS	Fire and Rescue Service
IPDS	Integrated Personal Development System
IRMP	Integrated Risk Management Plan
LGA	Local Government Association
LRAG	Local Risk Assessment Guidance
LRF	Local Resilience Forum
PPG 28	Pollution Prevention Guidance 28
PSA	Public Service Agreement
SSSIs	Sites of Special Scientific Interest

Annex F

Example Operational Incident Plan

62 – Gibson Paints, Albion Works, Trafalgar St, Newton

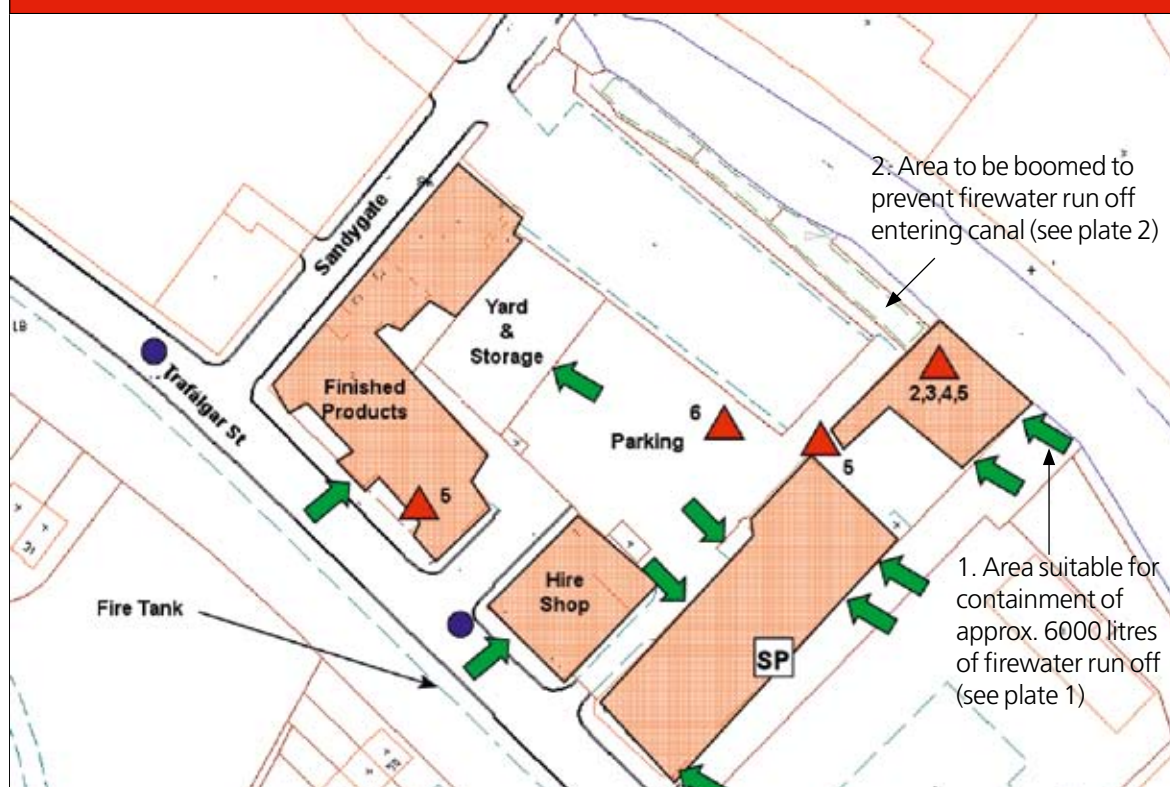
Lancashire Fire and Rescue Service Incident Plan – Fire & Rescue Services Act 2004 – 7.2 (d)	Ref No 62007
---	-----------------

Name: Gibson Paints Address: Albion Works Trafalgar Street Newton, BB65 4JX FSIS No: M0399 Grid Ref (6 figure): 654786 PDA: 2P	Informative Message Use: Paint Distribution and Biodiesel Manufacture Floors: 3 Basement: – N/A Length: 60m Width: 20m
--	---

Route from nearest main junction. Grid Ref of junction: 676789
From Jct 18 M68 follow Westway turn right into Trafalgar St. Premises are on left before Petrol Station.

Action on arrival (O.I.C. 1st Attendance)
• Main Entrance to Building at Front, (Trafalgar Street) • Contact Site Manager • Old Design and Layout of Building could possibly lead to rapid fire spread • Large quantities of paint stored in premises • Unlimited Water Supply from Canal off Sandygate

Site Location Plan



Primary Hazard Information

Hazard No	Type and Amount	Location	Further Information	Hazard
1	Petroleum mixes and paints	All Floors	Hazchem 3YE	Flammable & Toxic
2	Methylisobutyl ketone	Underground Tank	2500 Litres 3YE FDP 21°C	Flammable Liquid
3	Methyl Ethyl ketone	Underground Tank	4500 Litres, FP -5°C	Flammable Liquid
4	Toluene	Underground Tank	4500 Litres, FP -5°C	Flammable Toxic Liquid
5	Xylene	Underground Tank	4500 Litres, FP -24°C	Flammable Toxic Liquid
6	White Spirit	Ground Floor	5000 Litres	Flammable
7	Biodiesel	Ground Floor	10000 Litres	Combustible at raised temperatures & Toxic
8	Ethanol	Tank adjacent to Biodiesel Plant	Hazchem 2YE 5000 Litres	Flammable Toxic Liquid

Additional Information

- Electric cut off, ground floor works side entrance
- Gas cut off, ground floor works side entrance adjacent to inner yard
- Water cut off, adjacent to gas cut off
- Sprinkler stop valve, main corner entrance works, off Trafalgar Street

Environmental Protection

- Sources of pollution on site:
Various oils and toxic chemicals and waste solvents = HIGH RISK
- Pathways for run-off:
Most run-off direct to Leeds/Liverpool Canal at Rear.
Surface-water sewer along Trafalgar Street and Sandygate Lane, drains to River Calder under St James's Street
Groundwater – minor aquifer, vulnerability unknown.
Foul sewer runs along Trafalgar Street and Sandygate Lane, leads to Newton WwTW.
- Receptor sensitivity:
River Calder = MEDIUM
Leeds/Liverpool Canal = HIGH
Groundwater = MEDIUM
Newton Waste-water Treatment Works = LOW

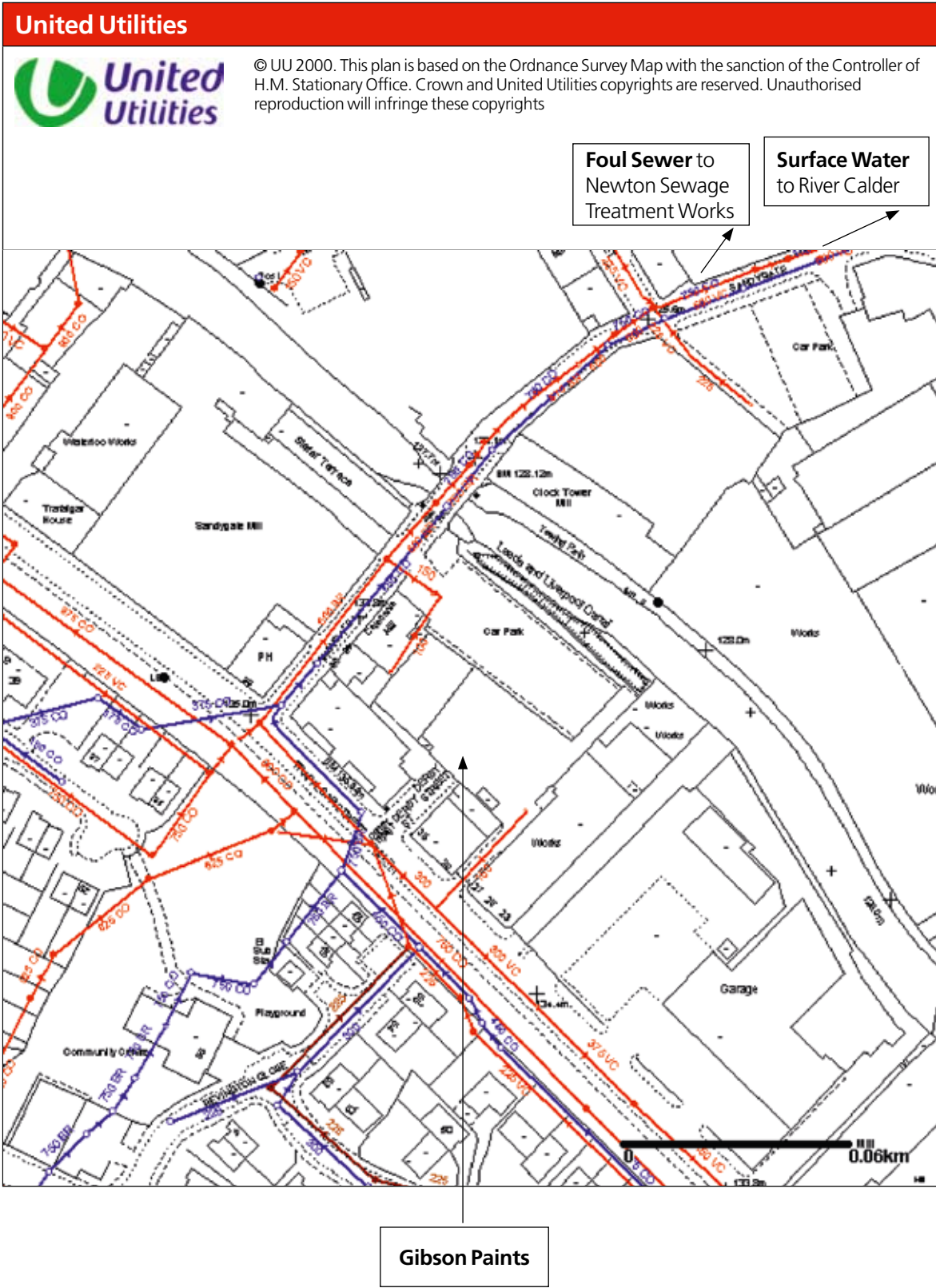
Environmental Protection (continued)

ACTIONS:

- Prevent firewater entering Canal at rear from two Points: Point 1 adjacent to Biodiesel Plant – ensure air valve in drain to canal is CLOSED, use bunded area to contain fire water, (see plate 1). Point 2 from parking area, will require booming to contain firewater, (see plate 2).
- Consider mobilising the Hazardous Materials & Environmental Protection Unit.
- Contain firewater.
- Contact Environment Agency for advice on firewater disposal.
- Fire water may be unsuitable for re-use due to flammable nature of on-site chemicals.
- Divert firewater to sewer only if it does not contain flammable liquids. Contact United Utilities first.
- Do not allow firewater to enter road drains at front on Trafalgar Street, these drain to River Calder.

POLLUTION PREVENTION SITE SPECIFICS:

- Most run-off is over yards direct to Canal. The only drain is adjacent to Biodiesel Plant, which has an air valve which should normally be CLOSED. This bunded area can store approx 6,000 litres of fire water, (see plate 1).
- Biodiesel Plant is regulated by Environment Agency (PPC) and an emergency plan for this area is in place.
- No drains in storage yard or parking area, run-off direct to Canal.
- Spill kits available on site.
- Foul sewer connection to front of buildings only.



Annex G

Cumbria Emergency Environmental Protection Group

Background

The Environment Agency and Cumbria Fire & Rescue Service have worked in partnership for many years to protect the environment in Cumbria. The Environment Agency has provided all front line appliances with environmental grab packs to enable them to contain pollutants at incidents. Pollution prevention equipment has been provided in the form of a Multi Purpose Response Vehicle and further pollution prevention equipment is placed at Fire Stations strategically throughout the county to deal with larger scale incidents.

Analysis of data relating to environmental incidents attended by the FRS between 1 April 2004 and 31 March 2005 (with potential or actual threat to the environment), indicated that the majority of incidents requiring the deployment of pollution prevention equipment were highways related incidents. Of the 66 incidents attended that were considered to offer a significant environmental threat, 58 were highways related and were dealt with using 'grab pack' equipment from front line appliances. This represents 88 per cent of such incidents. Analysis also suggests that highways related incidents formed the majority attended by the Cumbria Brigade in 2003/4.

The working partnership between Cumbria Fire & Rescue Service and the Environment Agency has now been extended to include Amey Mouchel, who have responsibility for the motorway network and the majority trunk roads in Cumbria on behalf of the Highways Agency.

The Partnerships aim is to enhance environmental protection service delivery on the major highways in Cumbria. This is being achieved by:

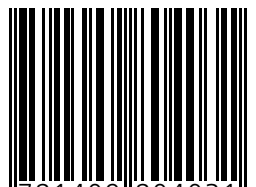
- Expanding the availability of environmental protection equipment at key strategic locations on the major roads network by utilising Amey Mouchel, Environment Agency and Cumbria Fire & Rescue Service depots
- Joint pollution control and prevention training exercises will be held in the near future. The training will concentrate on health and safety, attendance & call out procedures and primary duties at the scene
- Amey Mouchel are providing environmental protection equipment at all entrances and exits to motorways in Cumbria

- Amey Mouchel operation staff have received Incident Command and Cordon Control & Safety of training from the Fire Service
- Amey Mouchel operation staff will receive environmental awareness and incident response training from the Environment Agency
- The Fire Service and/or the Environment Agency providing health and safety information relating to any hazardous substances which may be encountered at a particular incident
- Involvement of Amey Mouchel staff in the incident debrief process.

A Memorandum of Understanding will be produced to reflect the roles and responsibilities of the three partner organisations in relation to environmental protection.

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