

ISSUE DETAILS

Reference	ENV/07	Issue No.	2	Issue Date:	03/09/2014
Title	Pollution Prevention				
Status	Revised				
Compliance Date	Immediate				
Document Owner	Chris Leek, Head of Q&E or Calvin Robertson, Environmental Advisor				

BRIEFING REQUIREMENTS

The following table defines how revised issues of this document are briefed to existing employees according to related specific responsibilities.

This is determined using the 'RACI' principle. Those roles identified as 'Responsible' and 'Accountable' should receive a formal awareness briefing facilitated by the Document Owner.

Role	RACI	Type of briefing
All Staff	Informed	Awareness
Bowser Drivers	Responsible	Technical
Depot Managers / Supervisors	Responsible	Technical
Interceptor Manager	Responsible	Technical
Project Managers	Responsible	Technical
HSQE Managers/Advisors	Responsible	Technical

PURPOSE

This standard has been produced to ensure VolkerRail (VR) comply with relevant pollution prevention guidelines and legislation, effectively managing our environmental aspects and impacts relating to the prevention of pollution and control of hazardous.

The storage and use of potentially polluting materials can have a significant impact on the environment if not controlled; therefore guidance within this document provides essential details on how the environmental impacts can be managed.

SCOPE

This standard is to be followed at all locations where the storage of hazardous substances takes place, both on sites and at temporary and permanent depots.

The standard includes all storage, handling, transport and use of potentially polluting substances, material and equipment, specifically referencing high risk refuelling processes.

The requirements of this standard are mandatory for all sites with potentially polluting substances and equipment. This standard must be adhered to in order to ensure continual compliance with legislation and pollution prevention guidelines from the Environment Agency

WHAT HAS CHANGED IN THIS LATEST ISSUE AND WHY

Document reviewed and decision taken to merge the requirements of the following standards into ENV/07:

- SQE/80 - Monitoring and Maintenance of Oil Interceptors and Drainage Systems and
- SQE/82 - Requirements for the storage of Hazardous Materials Substances and Equipment
- SQE/80 & SQE/82 will now be withdrawn from the system.

Title of standard amended from 'Management of Refuelling Operations' to 'Pollution Prevention'

ISSUE RECORD

Issue No.	Date	Summary of changes
1	14/09/2012	<p>Document transferred from SQE79 to ENV07 – previous revision details are shown on the archived standard SQE79.</p> <p>Full review undertaken and changes made to reflect current organisational structure. Document also updated to include further detail for the supervision of refuelling operations, with particular focus on Bowsers, following environmental site inspections at Frodingham, Scunthorpe.</p>
2	01/09/2014	<p>Document reviewed and decision taken to merge the requirements of the following standards SQE80 - Monitoring and Maintenance of Oil Interceptors and Drainage Systems and SQE82 - Requirements for the storage of Hazardous Materials Substances and Equipment into this standard.</p> <p>SQE80 & SQE82 now withdrawn from the system.</p> <p>Title of standard amended from 'Management of Refuelling Operations' to 'Pollution Prevention'.</p>

IMS AUTHORISATION

Approval	Name	Role
Document Owner	Chris Leek	Head of Quality & Environment
Document Owner	Calvin Robertson	Environmental Advisor
Approval for IMS	Emma Glenc	Assurance Manager
Approval for IMS	Chris Leek	Head of Quality & Environment

1. PURPOSE

This standard has been produced to ensure VolkerRail (VR) comply with relevant pollution prevention guidelines and legislation, effectively managing our environmental aspects and impacts relating to the prevention of pollution and control of hazardous.

The storage and use of potentially polluting materials can have a significant impact on the environment if not controlled; therefore guidance within this document provides essential details on how the environmental impacts can be managed.

2. SCOPE

This standard is to be followed at all locations where the storage of hazardous substances takes place, both on sites and at temporary and permanent depots.

The standard includes all storage, handling, transport and use of potentially polluting substances, material and equipment, specifically referencing high risk refuelling processes.

3. REFERENCES (INPUTS) / RELATED DOCUMENTS

- ENV/07 Appendices A to E
- ENV/05 – Waste Management
- ENV/08 - Management of Environmental Incidents
- Environment Agency Pollution Prevention Guidelines (PPG)
- Other Environmental Legislation as listed in the [VolkerRail Legislation Register](#)

4. DEFINITIONS

Discharge Consent	This can be obtained from the local sewerage undertaker when discharging to foul sewer or from the Environment Agency if discharging to surface water
Impermeable Bund	An impervious wall built around a fuel tank (i.e. concrete, bricks) or other fuel storage area that retains oil and any other hazardous materials by not allowing them to leak out following a spillage
Interceptor	Act's as a barrier to contaminants entering drainage systems by "filtering" out oil and other potential pollutants. They require regular maintenance and monitoring to ensure they continue to be effective
'Interceptor Manager'	Existing member of VolkerRail Staff who will be allocated the responsibilities of an 'Interceptor Manager' over and above their existing job role.
Large Plant	All OTM's, RRV's, RMMM's and RMC's
LPG	Liquefied Petroleum Gas
Other Hazardous Substances	Includes all those materials not previously discussed, e.g. paints, greases, meths, anti- freeze, cleaning materials, Batteries and Thermit welding products
Oil	Includes engine oils, gear oil, hydraulic oil, lubricating oil and any other oils not specified
Other Oils	Includes any other oils except diesel and hydraulic oils
Regulatory Body	Responsible for ensuring that the relevant legislation is complied with and for enforcing any legal action against the offending company
Small Plant	All hand-held plant/equipment able to be carried by one person. Refuelled by hand.
VRCC	VolkerRail Control Centre

Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 1 of 6	

5. PROCESS

The individuals with responsibility for the prevention of pollution must have suitable qualifications, training and/or experience in the appropriate management, control and mitigation of any potentially polluting substances and/or activities.

They have overall responsibility for liaising with the enforcing authorities and the emergency services and must be aware of the actions to take in the event of an emergency.

5.1 Management of hazardous materials, substances and equipment

5.1.1 Identification of Substances and Equipment

- a) Special conditions for storage must be identified in advance, e.g. segregation so the required conditions can be made available at the storage site.
- b) Handling methods and storage requirements must be detailed in the COSHH assessments which can be obtained through the VWUK database.
- c) On arrival, the consignments must be checked, identified and assessed for acceptability. If the contents are not immediately identifiable, they should be quarantined and placed in an area remote from other materials until identified.
- d) Any deliveries of potential pollutants that require secondary containment should be made direct to the bunded areas within the site (for example if a 205 litre drum of oil is delivered this should be immediately directed to the bunded area in order to avoid any storage on unmade ground).

5.1.2 Storage

Upon receipt, all packages containing hazardous substances must be checked to confirm there are no holes or cracks that may lead to the release of the substance to the environment. They must be handled carefully at all times to ensure they do not become damaged.

All stored containers must be periodically inspected to ensure the packaging is in good condition and there are no leaks. If a leak is found the container must be removed to a safe place in the open air and its contents safely transferred to another container.

All bunded areas, pipes, tanks, bowsers and other storage containers must undergo a regular inspection regime to ensure their integrity is maintained.

5.1.3 Handling / Transport

During transportation hazardous materials must be secured against spillages. Different substances must be segregated in vehicles and spill kits must be provided in company vans with appropriate signage displayed, further guidance on the required signage can be forced from the fleet department.

5.1.4 Plant / Equipment

Plant and Equipment should be stored inside when not in use. The store should be fully secure and resistant to weather conditions.

Small plant and equipment should be within bunded areas where possible. Alternatively it can be stored in large drip trays in order to retain any leaks and/or spillages. The drip trays must be regularly cleaned and emptied.

When plant and equipment such as generators and lighting columns are left running unattended staff should ensure that a drip tray is placed under the machine in order to catch any potential drips and leaks.

Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 2 of 6	

5.1.5 Fuel / Oil

Fuel / oil must be stored in either mobile or fixed fuel bowzers, 205 litre drums or smaller approved jerry cans. Access to the fuel/oil must be controlled, either through ensuring that one person is responsible for all refuelling or by ensuring that all those using the bowser/drums have been briefed on the correct use.

All full and empty oil drums must be retained in a secure storage area surrounded by a bund. If the number of oil drums stored at any one time increases, then the bund must also be enlarged accordingly. If there are no bunds available drip trays / plant nappies should be utilised as appropriate.

If any IBC's (Intermediate Bulk Containers) are used then these should be stored within a bunded area. When they are removed and in use they should be kept on a large drip tray or plant nappy in order to contain any possible drips or leaks.

Staff must ensure that risk of pollution is minimized, for example through ensuring that lids are placed on containers after use.

All waste oils must be transferred to the designated waste oil container(s) using an approved method, which must subsequently be retained within the bunded area until removal by contractors.

5.1.6 Aerosols

Flammable Liquids and aerosols must not be stored near other combustible, toxic, corrosive or oxidising materials, or compressed gases. Containers must be sited in a well- ventilated position away from sources of ignition.

5.1.7 LPG

All LPG cylinders must be stored in a properly constructed and carefully controlled storage area; this should be a well-ventilated position preferably in the open air.

Oxygen cylinders must be segregated from those of other gases, for example, propane and acetylene.

All full and empty gas cylinders should be segregated in locked cages/compound areas with steps taken to prevent tampering and vandalism.

5.1.8 Other Hazardous Substances

All other hazardous substances must be segregated from one another and all containers / packaging materials must be resistant to corrosion and protected from the elements.

- Greases must be stored in the boxes until they are required.
- Paints must be stored in a designated cupboard or area.
- Meths and anti- freeze must be stored in weather resistant containers.
- Unused cleaning materials must be stored away from potential contaminants. Residues from the cleaning processes must be disposed of via the oil interceptor (separator).
- Lead acid & NiCad Batteries shall be stored in cool, weather resistant conditions in a secure container
- Thermit welding consumables must be held in weather resistant conditions.

Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 3 of 6	

5.1.9 Site set-up

Permanent / Long term

It is the direct responsibility of the Depot Manager/ Storesman to identify, assess and ensure the safe storage of all potentially hazardous materials at permanent or long-term depots.

It is essential that they are stored in a safe and secure manner and at the designated locations within the depot or storage area and that they are not tampered with.

Temporary / Short term

It is the direct responsibility of Project Manager in liaison with the HSQE Advisor to identify, assess and ensure the safe storage of potentially hazardous materials at all site access points and temporary depots.

5.2 Refuelling Operations

5.2.1 Operational Control

In accordance the Environment Agency Pollution Prevention Guideline (PPG) 7 – The Safe Operation of Refuelling Facilities, it is necessary for staff trained in spill response / emergency procedures to supervise refuelling operations. All refuelling operations hold the potential for pollution incidents, therefore VR must implement appropriate measures to minimise the risks and mitigate the effects.

VolkerRail Bowser drivers should be outside of their vehicle, supervising the refuelling process at all times. At no point should the bowser be left unattended, helping to avoid spills, environmental damage and risks to staff on site.

Staff undertaking refuelling operations must ensure that they are not distracted whilst supervising the activity e.g. using mobile phones, entering into discussions with colleagues etc.

In order to minimise the risk to the environment during refuelling, the following items should be available to use at all times both on sites and in depots:

1. Spill kits

To be located on VR plant machines as well as in company vans and relevant areas on-site (this should be based on risk and identified when setting the site up). A large supply of spill kits must also be available at depots. Spill kits and/or spillsorb granules must be used to contain and clean up any spillages that occur during refuelling operations.

2. Drip Trays / Plant Nappies

To be used when refuelling to catch any drips and/or small spillages that may occur. Small plant should be stood in a drip tray during refuelling and they should be placed under the nozzle when refuelling large plant from bowsers/tanks or drums.

Drip trays can be pumped out and the contents can be transferred to a waste oil container. Alternatively, the pads from the spill kits can be placed in the bottom of drip trays to absorb any spillages. When the pads have reached their capacity they can be disposed of as hazardous waste.

3. Funnels

To be used when refuelling small plant from jerry cans. A funnel should be placed inside the entrance to the fuel tank to channel the fuel/petrol into the tank more easily minimising the risk of spillages.

Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 4 of 6	

4. Bunded Areas

All mobile fuel bowsers must be bunded with all pipes, delivery nozzles and gauges located within the bund when the bowser is locked.

Any storage of fuel / oil exceeding 200 litres must legally be within a bunded area in order to comply with oil storage regulations. Alongside this any other smaller containers used for the storage of fuel / oil should still be kept in a bund in order to contain any spillages that may occur and minimise pollution risk.

All bunds, whether of permanent or temporary construction must be capable of containing at least 110% of the volume of the largest container or where there is more than one container 25% of the aggregate volume of all containers held within the bunded area.

5.2.2 Flow Charts

This standard contains appropriate flowcharts to be followed depending on the type of refuelling being carried out. For ease of use flowcharts have been provided to describe the correct procedure to follow in Appendices A-D.

The most appropriate flowchart should be followed according to the type of refuelling taking place. These flowcharts are as follows:

- Appendix A - Refuelling at a Depot using Diesel
- Appendix B - Refuelling at Sites using Diesel
- Appendix C - Refill / Replenish using Oil's
- Appendix D - Maintaining Oils at the Correct Levels in Small Plant.

5.3 Site Drainage

5.3.1 Drainage Plan

A drainage plan must be produced or obtained from the landowner. The plan must be maintained, indicating the locations of surface and foul water drains. The drains must be easily identifiable, for example, drain covers painted blue for surface water and red for foul water drains.

If no drainage plan is available a suitable sub-contractor must be used in order that it can be established. Drainage plans must be easily accessible for audit and/or inspection purposes and in the event of an emergency. A change of activity means that the plan and associated consents need to be reviewed.

5.3.2 Interceptors

Where VolkerRail is responsible for monitoring and maintaining depot interceptors, each depot requires an 'Interceptor Manager(s)', whose responsibility shall be to check the interceptor system to ensure that it is in correct working order.

The 'Interceptor Manager', in conjunction with the Head of Quality & Environment, must ensure that any necessary authorisations are obtained from the sewerage undertaker and/or the Environment Agency, for example, discharge consents when discharging effluent to foul sewer drains and/or surface waters.

The 'Interceptor Manager' is responsible for ensuring that a maintenance log is retained and is kept up to date. This must be available for inspection at audits or other random or scheduled checks.

On a regular basis the 'Interceptor Manager' must check the interceptor is in correct working order, logging these checks and their findings. These checks should be documented in the form of a log or check sheet.

Further details of the process can be found as a flowchart in Appendix E of this document.

Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 5 of 6	

5.3.3 Vehicle Cleaning Activities

Wash waters from pressure washers and cleaning activities must not be discharged to surface water drains, watercourses or soakaways, under any circumstances.

Vehicle washing and any other associated activities must be carried out in designated, hard standing areas, draining to the interceptor. Unless an interceptor is available, vehicle washing must take place away from VolkerRail depots and suitable, alternative arrangements should be made.

5.4 Pollution Incidents

5.4.1 Management of Incidents / Control of Pollution

All environmental incidents (spillages) that occur whilst refuelling must be reported to VRCC immediately as detailed in ENV/08.

Spill kits and adequate replacement spill kit materials must be held on site at all times to be used in the event of spillages. The booms found within spill kits can be used to contain spillages and can be placed around drains to prevent contaminants entering them and causing pollution. Drain covers are also available from spill kit suppliers. It is essential that all staff know the appropriate actions to take in an emergency situation.

5.4.2 Disposal of Contaminated Waste

All hazardous waste must be disposed of as per the arrangements detailed in ENV/05. Hazardous Waste Skips can be found at various VolkerRail depots and sites – where Hazardous Waste skips are not provided the contaminated waste must be transferred to the most convenient VolkerRail site/depot; it must not be left at site.

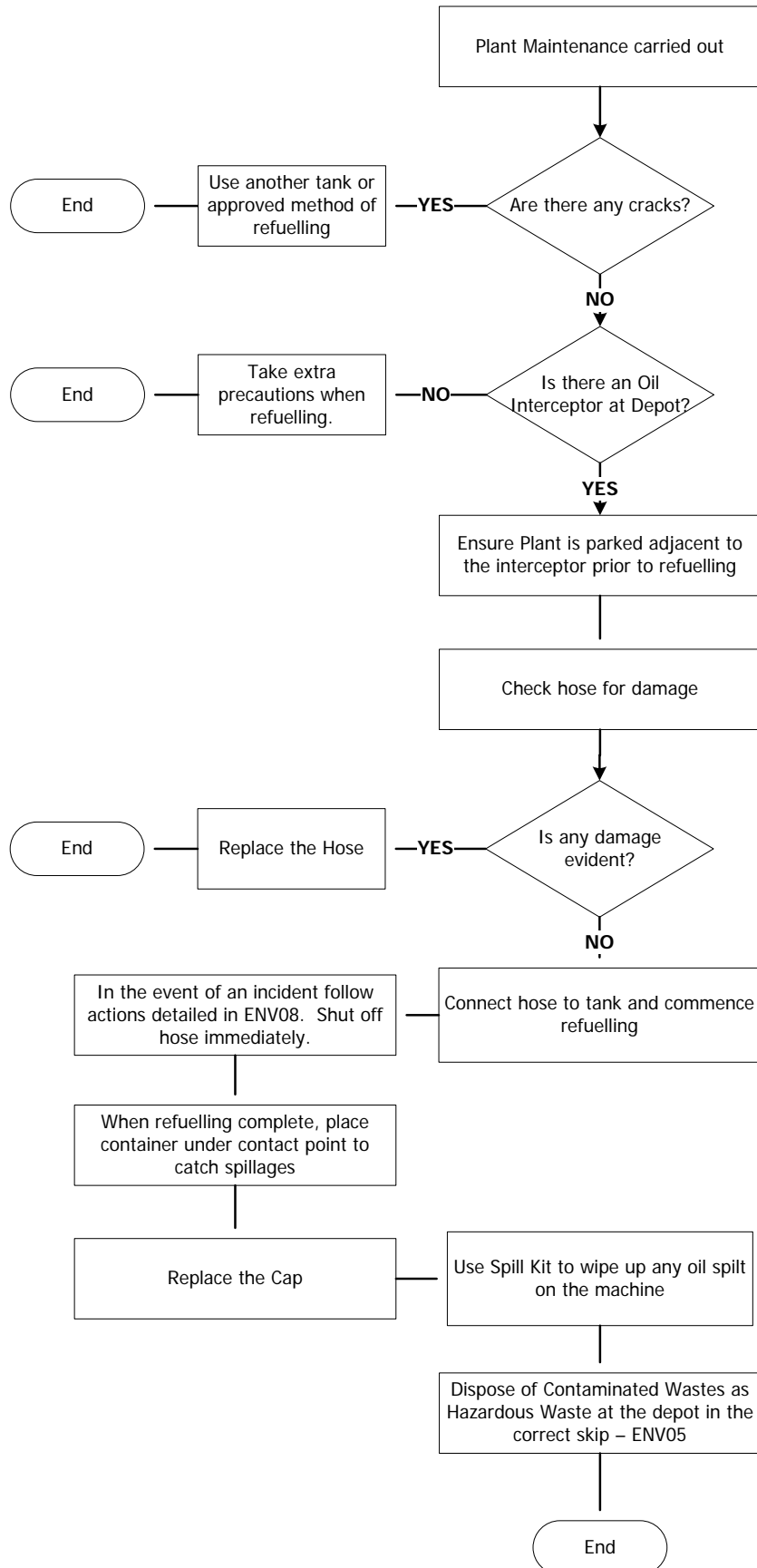
6. DOCUMENTATION (OUTPUTS)

- COSHH datasheets
- VRCC records of pollution incidents (airsweb)
- Interceptor Maintenance Logs
- Monitoring / Analysis Results
- Consignment Notes from Drainage Contractor when Interceptor emptied

All outputs should be retained/archived in line with VolkerRail’s Document Retention Guide within VolkerRail Standard QUA/10.

Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 6 of 6	

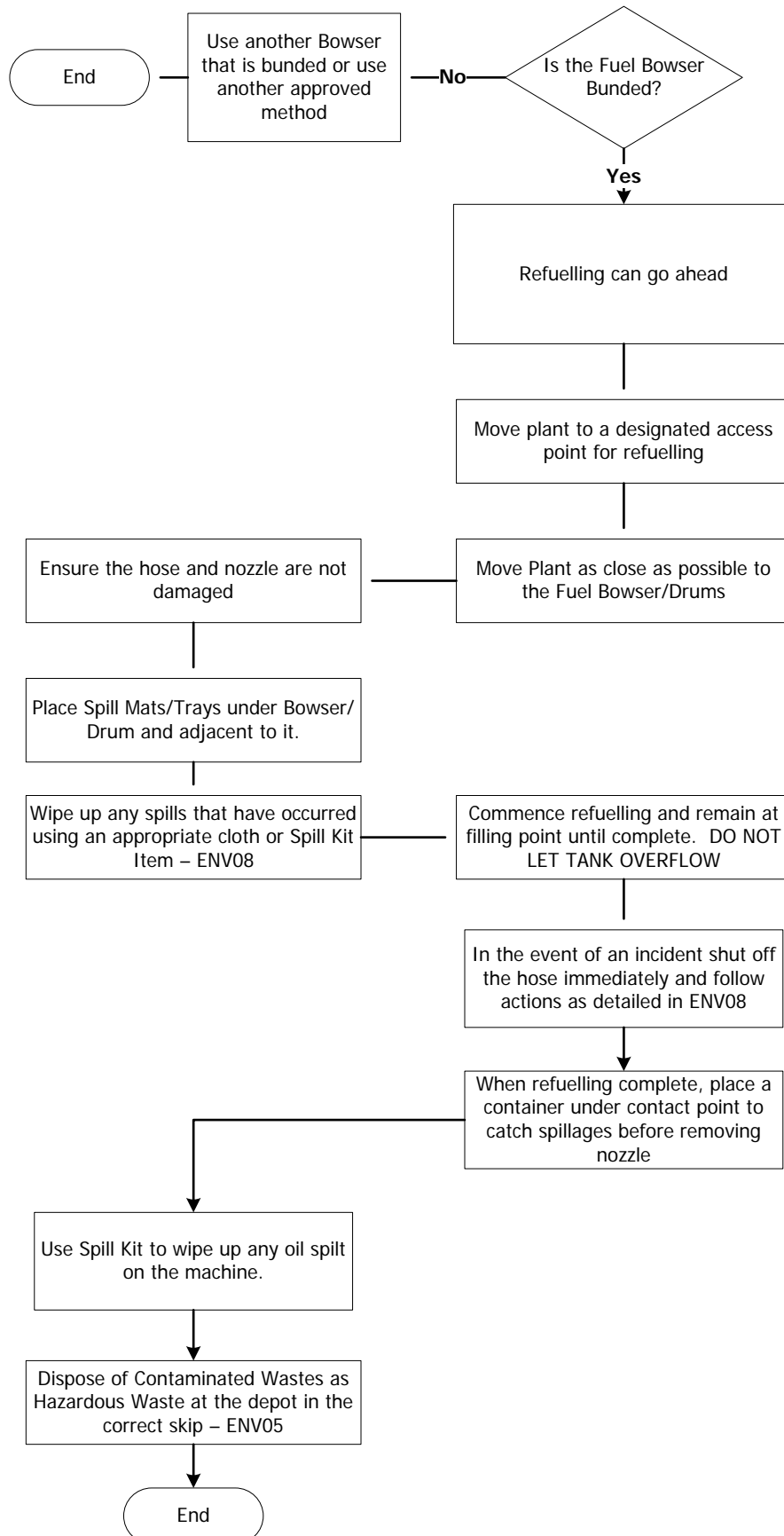
Person Responsible: Plant Maintainer/Operator
Frequency: Every time plant returns to a depot



Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 1 of 1	

Person Responsible: Plant Maintainer/Operator/Bowser Driver

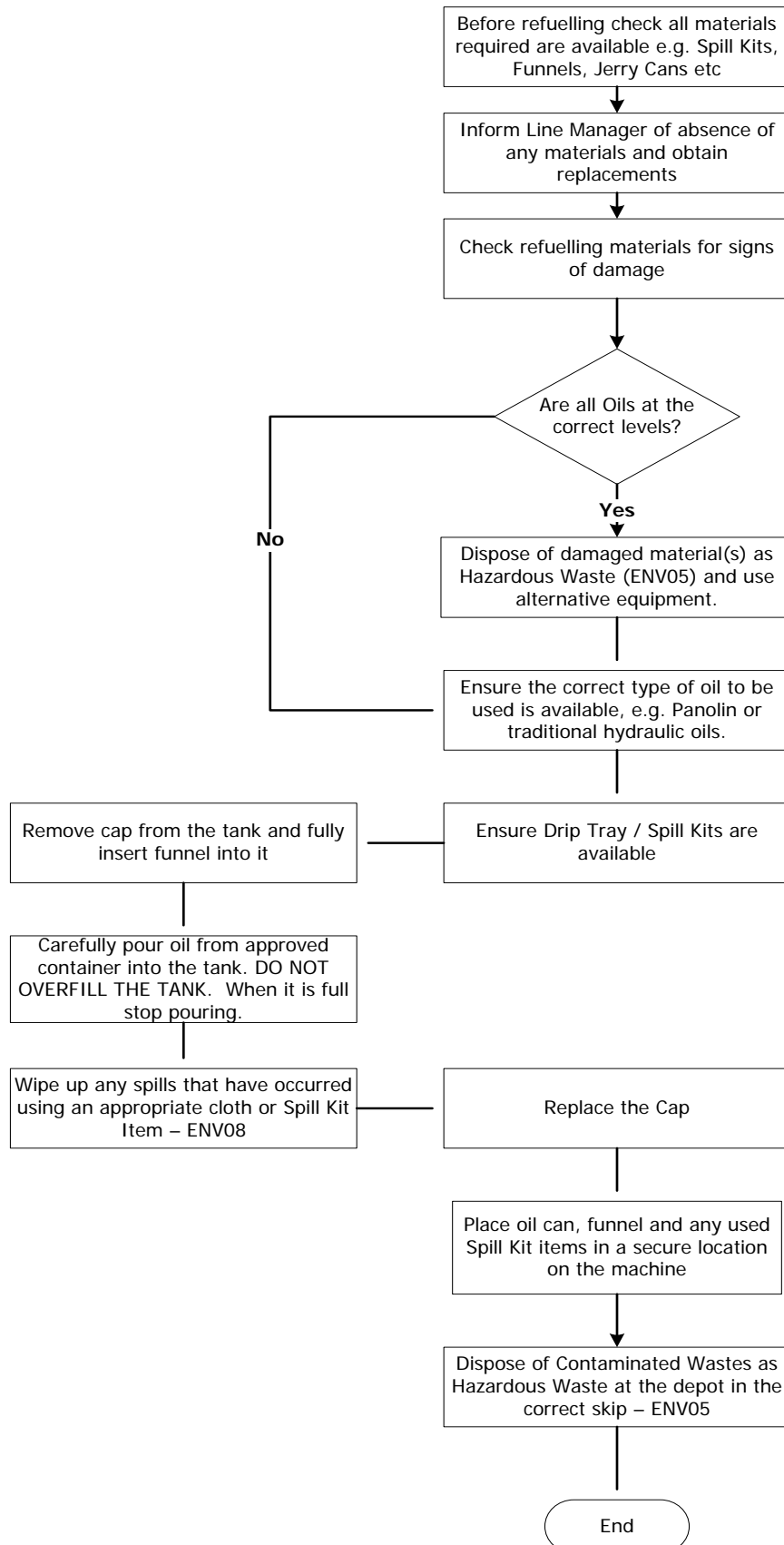
Frequency: End of every shift



Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 1 of 1	

Person Responsible: Plant Maintainer/Operator

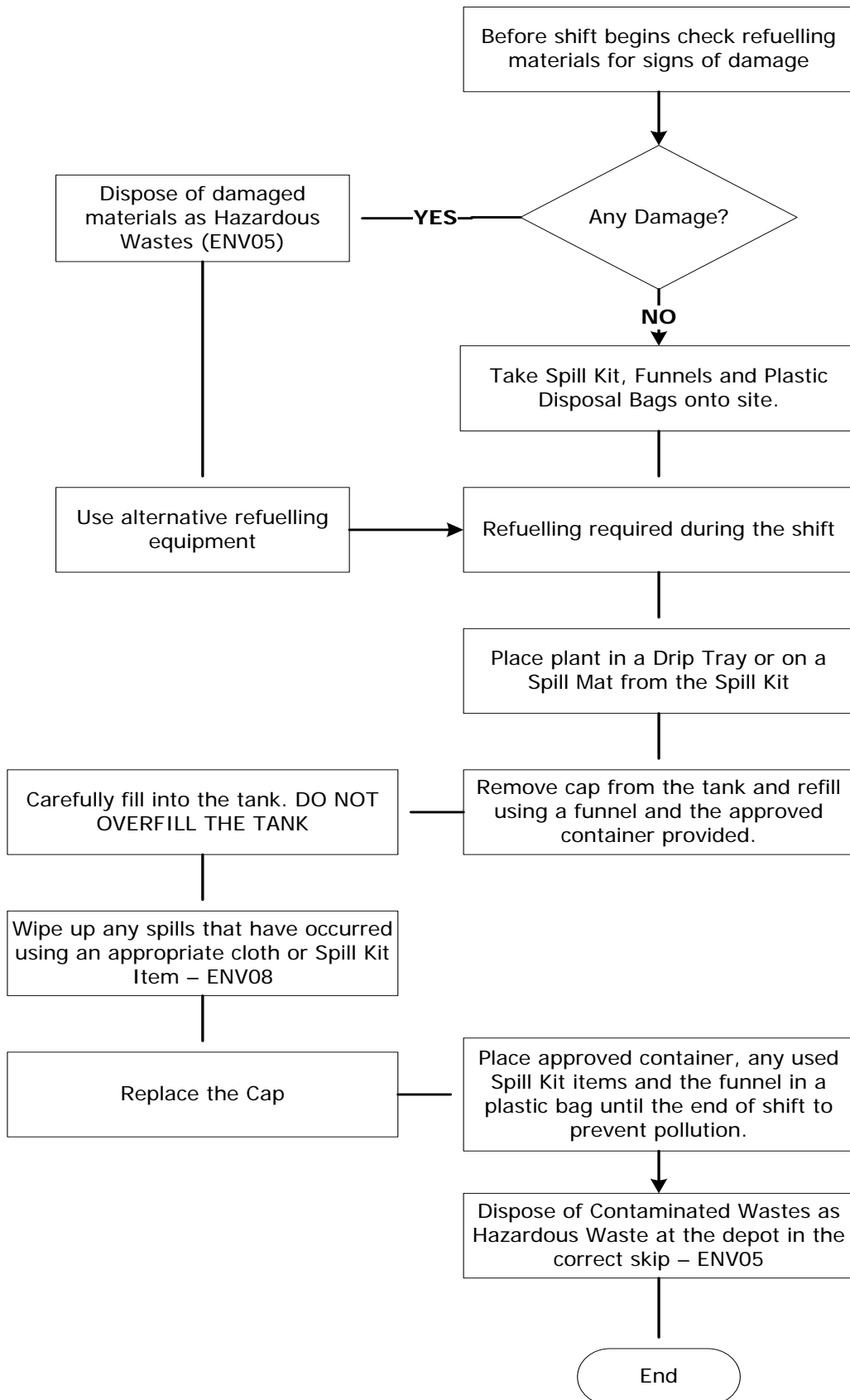
Frequency: Varies dependent on machine. Defined in planned service schedules.



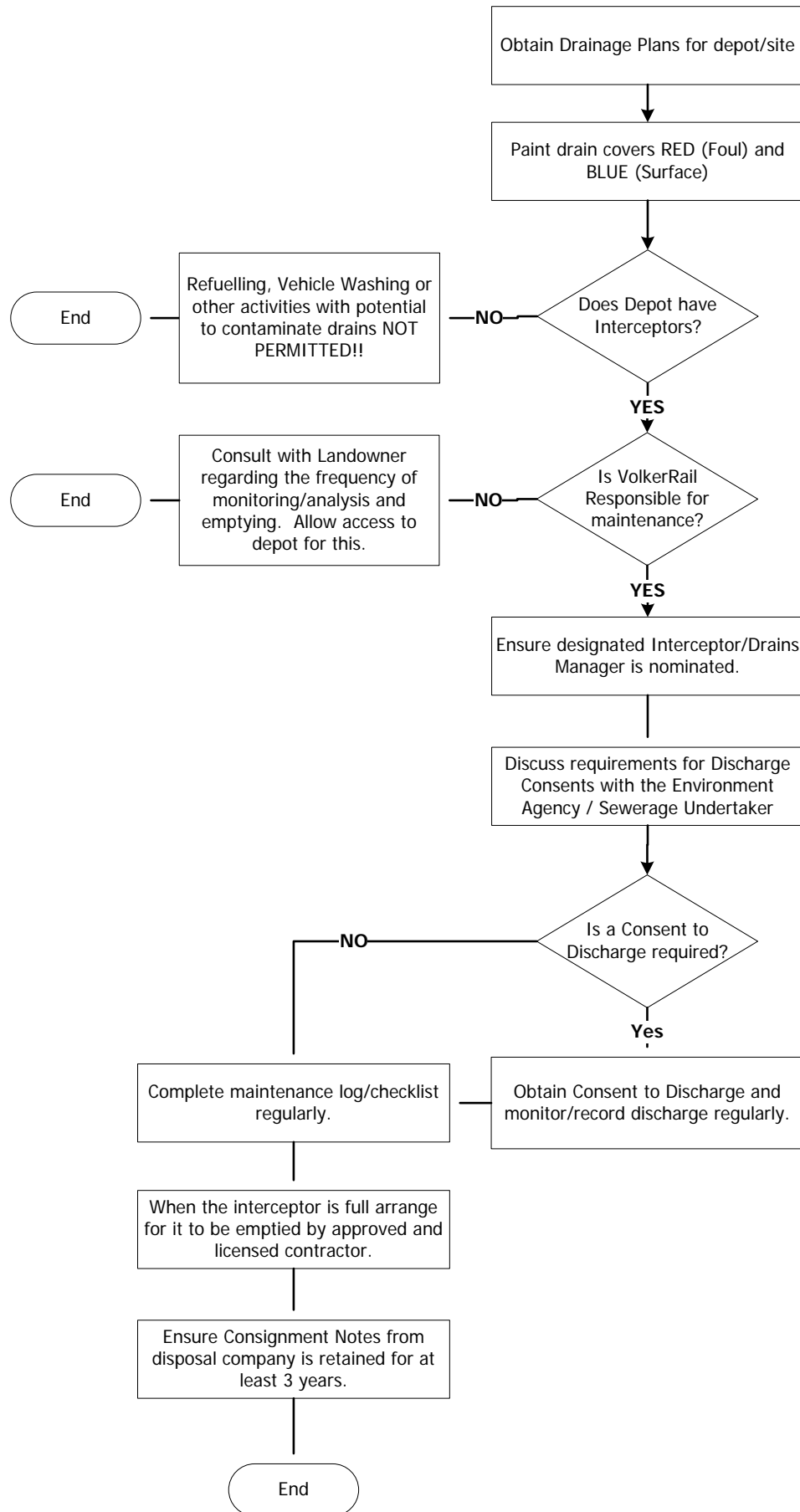
Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 1 of 1	

Responsibility: **Operatives of Small Plant**

Frequency: **Various. Whenever deemed necessary or when tank is empty**



Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 1 of 1	



Issue no:	2	Date:	03/09/2014	Parent document:	IMS Section Number 9.34		
Approved for IMS:	Assurance Manager	Document owner:	Head of Q&E	Workspace file:	N/A	Page 1 of 1	