

Issue Details	Ref	ENV/08	Issue No.	2	Issue Date	01/08/2014
Issue Title	Management of Environmental Incidents					
Issue Status	Revised					
Compliance Date	Immediate					
Standard Contact	Chris Leek, Head of Q&E or Calvin Robertson, Environmental Advisor					

Affected Roles

The following roles have specific responsibilities within this standard and must receive a briefing as part of implementation. This is determined using the 'RACI' principle for roles identified as 'Responsible' and 'Accountable'

An awareness briefing will be circulated to those roles identified as 'Consulted' and 'Informed'

Role	Type of briefing	Business
VRCC	Technical	P&W
Project Managers	Technical	Group
HSQE Managers / Advisors	Technical	HSQE
Environmental Advisor	Technical	HSQE
Project Staff	Awareness	Group
All Staff	Awareness	Group

Purpose

This standard details how environmental incidents are identified and dealt with in a consistent, comprehensive and structured process, thereby preventing pollution to land and watercourses, preventing excessive nuisance and preventing harm or damage to protected species and/or a protected site.

Scope

This standard applies to environmental incidents in relation to all VolkerRail (VR) normal and abnormal company operations. It is to be applied at all depots, offices and line side workings and includes oil/diesel spillages from rail plant, equipment and machinery and resulting from activities such as the maintenance and refuelling of vehicles.

This standard also applies to any incidents relating to other methods of pollution (e.g. waste disposal), nuisance as a result of our works and any negative effects to protected sites/species.




When managing discoveries of SSSI's, other protected sites and/or species of flora/fauna or when damage to them occurs, the action also outlined in VR Standard ENV/09 Management of Protected Sites and Species, must be followed.

Summary of Changes

The standard has been updated to include further detail of potential environmental incidents. The tables included in clause 6.2 identify examples of environment incidents including oil spills, disturbance of a protected species, breach of a Section61 consent etc.



Management of Environmental Incidents

Author	 _____	
	Calvin Robertson, Environmental Advisor	
Approved by	 _____	
	Chris Leek, Head of Quality & Environment	
Accepted for issue	 _____	
	Emma Glenc, Assurance Manager	

Document Control

This is a controlled document.

Electronic Copies issued under controlled procedures will be maintained via a controlled intranet environment. Hard copies will be marked green 'Controlled Copy' with a red controlled copy number.

Any copies printed from the intranet will be deemed uncontrolled and will not be subject to update. These documents should be used for information only.

Issue Details

This document will be updated when necessary by distribution of a complete replacement.

Amended or additional pages will be marked by a vertical black line in the adjacent margin.

Issue No.	Date	Details of Change
1	September 2010	First issue as ENV08 - formerly issued as SQE78. Historical revision details can be sought from the Operations Standards Manager if required. No changes to the process requirements
2	01/08/2014	Updated to include further detail of potential environmental incidents. Also updated in line with updated legislation and business needs.

Copyright

This document is property of VolkerRail. It shall not be reproduced in whole or part nor disclosed to a third party without the written permission of VolkerRail.

© Copyright VolkerRail 2014.

Published and Issued by VolkerRail, Carolina Court, Lakeside, Doncaster, DN4 5RA

Contents

1. Purpose 4

2. Scope..... 4

3. Compliance 4

4. Definitions and Abbreviations 4

5. References 5

6. Management Arrangements 6

6.1. Introduction 6

6.2. Incident Response Reporting Procedure 6

6.3. Guide to when the EA/SEPA must be informed 8

6.4. Emergency Spill Kits 9

6.5. Environmental Emergency Planning..... 10

6.6. Completion of Environmental Incident Report on AIRSWEB..... 10

6.7. Management of Subcontractors 11

6.8. Staff Awareness and Training..... 11

6.9. Testing the Emergency Response Procedure 11

7. Monitoring 11

7.1. Proactive 11

7.2. Reactive 11

8. Retention of Records 11

Appendices

- A Actions to be taken following an oil spill flowchart

Associated Forms

None

1. Purpose

This standard details how environmental incidents are identified and dealt with in a consistent, comprehensive and structured process, thereby preventing pollution to land and watercourses, preventing excessive nuisance and preventing harm or damage to protected species and/or a protected site.

2. Scope

This standard applies to environmental incidents in relation to all VolkerRail (VR) normal and abnormal company operations. It is to be applied at all depots, offices and line side workings and includes oil/diesel spillages from rail plant, equipment and machinery and resulting from activities such as the maintenance and refuelling of vehicles.

This standard also applies to any incidents relating to other methods of pollution (e.g. waste disposal), nuisance as a result of our works and any negative effects to protected sites/species.

When managing discoveries of SSSI's, other protected sites and/or species of flora/fauna or when damage to them occurs, the action also outlined in VR Standard ENV/09 Management of Protected Sites and Species, must be followed.

3. Compliance

Compliance with the requirements of this standard is mandatory and necessary to ensure that VR meet their legal obligations under the relevant environmental legislation.

It also underpins the commitments and arrangements contained within elements 15 and 34 of the VR Integrated Management System (IMS) which forms part of the company safety certificate, principal contractor's licence and plant operator's licence requirements.

Alongside this the standard ensures VR's compliance with Network Rail's (NWR) reporting agreement with the Environment Agency (EA).

4. Definitions and Abbreviations

Controlled Waters	Covers virtually all fresh and saline natural waters up to the UK offshore territorial limit, including rivers, streams, lochs, estuaries, coastal waters and groundwater.
CCW	Countryside Council for Wales
EA	Environment Agency
EFR	Environmental Frequency Rate
HoQE	Head of Quality & Environment
Oil	Refers to any hydraulic fluids, fuel oil, diesel, petrol or lubricating oil
Special Area of Conservation (SAC)	An international designation
Special Protection Area (SPA)	An international designation
Site of Special Scientific interest (SSSI)	An area designated by Natural England as a result of its geological, hydrological, ornithological etc. properties. These areas must be protected.
SEPA	Scottish Environment Protection Agency
SNH	Scottish Natural Heritage
VRCC	VolkerRail Control Centre

Major Reportable Environmental Incidents

An event or series of events that causes significant environmental damage; or

A breach of Environmental Legislation or consent conditions that is likely to lead to statutory intervention and / or significant environment damage; or

Issue of Statutory Enforcement Notice e.g. an issued by the Local Authority (Abatement Notice) or Environment Agency; or

A situation where site activities must stop within the vicinity of the affected area.

Examples of a major reportable environmental incident can be found in clause 7.2.1 of this standard.

Environmental Emergency

An event or series of events that is not under control and requires the assistance of external agencies to minimise potential harm to the environment.

Examples of an environmental emergency can be found in clause 7.2.1 of this standard.

Environmental Incident

An inappropriately controlled emission to land, air or water including noise and vibration, that has the potential to cause environmental damage; or

A non-compliance with the VR environmental management standards; or

A breach of Environmental Legislation.

Includes instances of route crime; trespassing and theft on company and client's property.

5. References

ISO14001 International Standard Environmental Management Systems

IMS Element34 Environmental Management

VolkerRail Project Management Standards

ENV/01 - VolkerRail Environmental Policies and Arrangements

ENV/02 - Identification of Environmental Aspects and Impacts

ENV/05 - Waste Management

ENV/06 - Best Practicable Means: Control of Statutory Nuisances

ENV/07 - Pollution Prevention

ENV/08 - Management of Environmental Incidents

ENV/09 - Management of Protected Sites and Species

NR/SP/ENV/015 – Network Rail Contract Requirements Environment

London Underground Contract QUENSH Conditions Clause 52.

NR/L3/MTC/EN0098 – Leak and spills incident response

NR/L3/MTC/EN0099 – Protected Sites and Species Management

For a list of the most up to date environmental legislation relating to this standard please refer to the VR Legal Register available on the Intranet or from the **HoQE/Environmental Advisor**.

Spill Response Guidance Notes and associated information available on the Intranet

6. Management Arrangements

6.1. Introduction

The Environment Agency (EA) in England and Wales and the Scottish Environmental Protection Agency (SEPA) in Scotland set stringent discharge conditions for all controlled waters, including groundwater. Any breach of these conditions may result in a fine and/or imprisonment for the polluter. The Local Water Authority is also responsible for the control and management of this.

The EA and SEPA are responsible for enforcing strict waste regulations regarding legal disposal of waste.

Natural England (Scottish Natural Heritage or Countryside Council for Wales) is the body responsible for regulating the country's protected species (e.g. Great Crested Newts, bats, reptiles) and designated sites, for example Sites of Special Scientific Interests (SSSI's). VolkerRail is responsible for reporting any damage to protected species of flora and/or fauna to these agencies.

Where spills occur on the public highway the relevant Local Authority shall be informed. The local authority is also responsible for managing any nuisances that may cause disruption to the public, local businesses or sensitive receptors.

This standard briefly outlines the environmental legislation applicable to VR's operations and with which the company must comply and explains how to minimise the risk of environmental incidents through oil contamination, damage to protected species of flora/fauna, nuisance and unauthorised waste disposal.

6.2. Incident Response Reporting Procedure

In the event of any type of environmental incident necessary action shall be taken as quickly and efficiently as possible to prevent or minimise the detrimental effects to the environment caused by the incident. The tables below provide examples of typical environmental incidents.

Example 1 – Water related environmental incident		
Environmental Incident	Major Reportable Environmental Incident	Environmental Emergency
Oil spill less than 20 litres occurring on site but away from any noticeable watercourse, or spill contained within the machine with little or none spilt on to the ground.	Oil spill 20 litres or greater spilt on to the ground.	Oil spill occurring on site with the likelihood of runoff entering the local storm drainage or water course. Emergency services involvement e.g. Police, Fire and Environmental Agency.
Example 2 – Noise related environmental incident		
Environmental Incident	Major Reportable Environmental Incident	Environmental Emergency
Potential breach of Section 61 Consent and contract requirements narrowly avoided.	Any breach of Section 61 consent conditions and contractual requirements identified through monitoring or through complaint.	Undertaking works without Section 61 consent where required. Severe noise disruption causing a nuisance to local residents. Possible Police and EHO involvement.

Example 3 – Air Quality related environmental incident		
Environmental Incident	Major Reportable Environmental Incident	Environmental Emergency
A vehicle exceeding the site speed limit on a haul road during a dry period and creating excessive dust emissions and/or little or no dust suppression in a particular area during a dry/windy period causing excessive dust emissions.	A site activity such as concrete cutting or ballast dropping where the majority of the dust plume is affecting a nearby public residence that is causing a statutory nuisance to the inhabitants.	A vehicle fire on site creating dense black smoke plumes and causing major disruption to the local area (roads, houses etc.)
Example 4 – Waste related environmental incident		
Environmental Incident	Major Reportable Environmental Incident	Environmental Emergency
VR waste being taken away by a non VR approved waste contractor.	Waste being disposed of at an unlicensed site or fly tipped.	Contaminated waste being fly tipped causing a significant pollution risk.
Example 5 – Ecology related environmental incident		
Environmental Incident	Major Reportable Environmental Incident	Environmental Emergency
Work taking place within the vicinity of a protected site / species without appropriate controls in place.	Damage to a protected site or species (e.g. removal of a badger sett without a licence) or spread of an invasive species.	Works have caused the death of a protected species or significant pollution / harm to a protected site.

All VolkerRail staff are considered responsible for the prevention of pollution and the provision of an immediate and effective response in the event of an environmental incident. The first stages of response are:

Stop, Contain, Notify

In ALL instances the environmental incident must be reported to **VRCC** as soon as practicably after the event. When reporting incidents to **VRCC**, VolkerRail staff should remember to include as much information relating to the incident as possible e.g. proximity of watercourses, estimated volume of spilled oil, machine numbers, details of any associated third parties (clients, members of the public) etc. **VRCC Duty Controllers** will assist in prompting the reporter for relevant information.

Specific requirements dictated by the client must be reviewed and assessed by the relevant **Project Manager/HSQE Advisor/Environmental Advisor** to ensure the requirements are included within the Project Environmental Management Plan (PEMP) and communicated to all relevant project staff.

It is the responsibility of the **VRCC Duty Controller** to determine the level of onward reporting of environmental incidents, including the notification to the EA, relevant client, relevant emergency services and spill response contractors.

When major incidents occur (e.g. those involving liaison with the EA, British Waterways, Natural England and/or water authorities), or when chemicals are used in any 'sensitive areas' as defined by the EA, a risk assessment should be undertaken to achieve a balance between the need to maintain a safe operating infrastructure with protecting the environment.

Upon damage to or the discovery of any protected sites and/or species during the work, VRCC should be notified immediately and associated actions outlined in ENV/09 – Management of Protected Sites and Species should be followed.

6.3. Guide to when the EA/SEPA must be informed

If oil or other hazardous substances are present in any watercourses or surface water drains, VRCC must inform the EA/SEPA immediately. If the drain is a foul water one, the local sewerage undertakers must be informed. If necessary drainage maps of the area may be obtained to identify the locations of all surface water and foul sewer drains.

When informed, the EA/SEPA will offer advice and assistance initially over the telephone. The following tables provide guidelines and the client must always be consulted prior to informing the EA/SEPA. The list is not exhaustive and each incident must be considered on an individual basis dependent on the local environment.

Type of Substance	Comment
Any HAZCHEM listed product	Any product listed in Railway Group Standard GO/RT3053/1 <i>Appendix 1 – List of Dangerous Goods with their United Nations Number, Dangerous Goods Class and TOPS Commodity Code</i> , of the Working Manual for Rail Staff
Oil and Diesel fuel 20 litres or greater	The quantities shown are as defined by the Environment Agency
Petrol 50 litres or greater	The quantities shown are as defined by the Environment Agency
Low hazard products with polluting potential	The Environment Agency has provided the quantity definitions shown in table 2 below.

Table 1 – Substances and quantities requiring to be reported where spillages or leakages to the environment occur

Low hazard products with polluting potential

The following quantity definitions have been provided by the Environment Agency in respect of low hazard products with polluting potential.

Substance	Threshold for reporting	Example of substance
Detergents	>25 Litres	Train cleaning chemicals, washing powder, washing up liquid, shampoos, soaps, car cleaning products
Disinfectants	>25 litres	Toilet cleaner, household bleach, dettol etc.
Foodstuffs	>250 litre	Most have the potential to cause problems especially sugars, salt, syrups, milk, cream, yoghurt, vinegar etc.

Fertilisers	>250 litres	All
Paints and dyes	>25 litres	All
Inorganic powders	>250 kilograms	Silt, sand, cement, chalk, gypsum/plaster
Other organic liquids or slurries	>25 litres	Antifreeze, cutting oils, lubricating oils, cooking oils, blood, offal, sewage sludge

Table 2 – Low hazard products with polluting potential

The EA must also be informed if the accidents are by / near a watercourse, or where line side drainage is close to the spillage point and may discharge to a watercourse. They must also be informed if the incidents are within or affecting protected / sensitive sites such as a Site of Specific Scientific Interest (SSSI).

6.4. Emergency Spill Kits

All VR Plant Maintenance Vehicles, OTM's, RRV's, RMC's and RMMM's must carry a 'Large Oil Response Kit' capable of responding to a major incident. Each machine must carry as many absorbents as space on it allows. Where necessary, specific boxes/containers may be manufactured for the machines in which to store the spillage kits and may be labelled to indicate where absorbents can be found. The **VR Plant Depot** must also have a supply of spill kits capable of cleaning up a minimum of 20 litres of fuel/oil as well as an ample supply of replacement materials.

It is the responsibility of the **Plant Maintenance Staff** and **Machine Operators** to ensure the contents of spill kits are replenished when any part of it has been used. It is the responsibility of the maintenance staff and machine operators to ensure that the supervisor for the project is informed of any spills that occur from plant operating on their site.

Emergency spill kits must be made available at all VolkerRail core locations and depots where there is a potential risk of pollution including:

- Carried in all company vehicles undertaking maintenance, welding activities and Tool vans
- Site access cabins
- Depot/Worksite storage areas

All sub-contracted plant, both large and small, must include spill kits and drip trays as a standard condition of hire. Where relevant, all plant and attachments must be filled with Panolin bio-degradable oil or other similar oil, to minimise the risks of pollution.

If VR respond to an incident that has occurred from sub-contractors plant and equipment, the company reserves the right to pass any costs incurred (clean-up costs, call-out fees etc.) onto the hire company. If spills occur from Train / Freight Operating Company's then the Client shall be charged for the clean-up costs incurred.

All plant hire companies shall be reminded of VR's HSQE Policy, of the company's commitment to pollution prevention as well as the control measures to be used on VR's sites by providing them with a copy of the relevant standard and policy with an acknowledgement sheet for signature(s).

'Spill Mats' are to be used to wipe/soak up spills, 'Spill Socks' must be used to contain larger spills on solid ground and 'Spillsorb' or similar granulated materials are to be used to soak up spills on solid ground and then swept up and disposed of as hazardous waste. ENV/05 – Waste Management should be referred to for the correct disposal methods. N.B. When using lubricating oils with small plant ensure that a mat is placed underneath the rail to soak up the oil.

With the exception of Booms (used to control spills in a watercourse) all items of the used spill kit etc must not be left on site. All items should be placed within the plastic bags provided with the kit, secured and then returned to the local VR depot ready for disposal as hazardous waste.

When spill kits are used to clean up the spill, replacement spill kit(s) must be provided to ensure that adequate spill response materials are always made available.

When there has been a major spill over 20 litres VRCC will contact the emergency spill contractor to deal with the clean-up operation. Due to the nature of the works however this may not always be possible (e.g. during a possession), therefore the client may take responsibility for the clean up operation.

There may be a requirement for a regulator (e.g. Environment Agency, Natural England) to visit the site following the environmental incident. In this case the regulator should be escorted at all times with their attendance on-site logged with VRCC.

6.5. Environmental Emergency Planning

It is the responsibility of the Project Manager to ensure a project specific environmental emergency plan is included within the PEMP. This emergency plan should detail the following information:

- Specific risks to the environment and employees
- Identify the controls required to protect the environment and employees
- Identify the responsibilities of project staff
- Establish the action to be taken in the event of an emergency

Alongside the above all **VR staff** must ensure that when they are setting up a depot, worksite or office a copy of the local drainage plan is requested and displayed in order to ensure quick effective response to any incidents.

In order to develop the emergency plan the **Project Manager** will utilise the Project Environmental Checklist and Report (PECR) process as stated within ENV/04 – Project Management and the Environment, which will identify the hazards and reduce the risks and minimise the damage should an incident occur.

The **Project Manager** will ensure that all project staff are briefed on the requirements of the environmental emergency plan contained within the PEMP. This briefing can form part of the project specific induction briefing, with suitable records being retained.

6.6. Completion of Environmental Incident Report on AIRSWEB

All environmental incidents as referred to in this standard shall be reported to VRCC by **VolkerRail staff** and recorded on the AIRSWEB system.

The **HoQE/Environmental Advisor** and relevant **HSQE** staff shall review the VRCC logs and indicate any further actions required on the AIRSWEB system. Where deemed necessary an investigation can be instigated following a major environmental incident – this shall be determined by the **HoQE and/or HSQE Director** following the remit process within VR standards SAF/04 – Reporting and Investigation.

The **HoQE** shall report on the number of environmental incidents in the HSQE Performance Report on a monthly basis.

6.7. Management of Subcontractors

All sub-contractors that are used by VR must comply with the requirements of this standard. The **Project Manager** shall ensure sub-contracted staff are briefed, preferably alongside VR staff, on the correct use of spill kits and of the actions to take in the event of a minor or major spill or upon any damage occurring to protected sites or species of flora/fauna.

6.8. Staff Awareness and Training

VR staff shall be made aware of the requirements of this standard through the briefing and induction processes employed within the company. The **HoQES/Environmental Advisor** shall ensure that the key messages are included in the HSQE Induction.

The **HoQES/Environmental Advisor** shall prepare a number of briefing notes/toolbox talks and alerts at regular intervals to re-enforce the requirements of this standard. These shall be displayed at all VR depots/locations.

Certain projects where VR acts as Principal Contractor will include environmental incident response highlights within the projects site specific induction.

Spill response training shall also be provided to relevant staff as identified by their line manager.

6.9. Testing the Emergency Response Procedure

This procedure and the response of the staff involved in managing an environmental incident must be periodically tested. This must be carried out to ensure that it is implemented fully in the event of a 'real' incident and that any adverse environmental impacts occurring as a result of the incident can be prevented or mitigated. These 'tests' will also highlight any deficiencies in the procedure that need rectifying in future reviews of the procedure. **VRCC** shall have prior warning of any 'tests' in order that they avoid unnecessary telephone calls to external parties.

It is important that all personnel that may have to react to an incident are fully aware of the actions to take in the event of the incident. The method of implementation of the 'tests' must be determined by the **HoQE** in conjunction with the **Environmental Advisor**. Records of all 'tests' must be retained for future audit purposes on AIRSWEB.

7. Monitoring

7.1. Proactive

Environmental incident data is analysed and included within the monthly HSQE Performance Report. Major environmental incidents contribute to the company EFR which is measured against the target EFR set by the **HSQE Directorate**.

7.2. Reactive

The **HoQE** shall include Management of Environmental Incidents within the audit programme. This process will also be subject to external audits.

8. Retention of Records

Record	Retained By	Retention Period
Record of Environmental Incident	AIRSWEB	3 years
Record of Environmental Incident Test	AIRSWEB	3 years

