Why you Should Cry Over Spilt Milk!

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A session to highlight the environmental and business importance of having spill response procedures as well as Remedial, Restoration and Reporting Response Plans.

The session will include:
- Appropriate plans and procedures
- Why have them
- Costs vs Benefit
- Support available from external agencies
- Spill response training and spill kit
- Emergency spill exercise
- Awareness of Enforcement Undertakings
- Group activity and feedback
In order to establish the appropriate emergency plans you need to know what your risks are, it’s not always the big things which pose the biggest risk!

What do you think some of the risks might be?
- Cars – driving too fast over speed humps and damaging sumps
- Buses and HGV’s – diesel spills from overfilled / insecure tanks
- Contractors – washing stuff down surface water drains
- Refuelling – on site petrol and diesel
- Chemicals – only occasional spills, users tend to be much more careful!
- Waste Management

What procedures do you require?
- Operational Controls
- Emergency Response procedures
- Spill Kit and appropriately trained staff in their safe and effective deployment.
Why have them?

Environmental Protection:
• Pollution Prevention
• Avoid prosecution
• EMS Requirement
• Common sense

ISO14001:2015 - The organization shall establish, implement and maintain the process(es) needed to prepare for and respond to potential emergency situations

Business Continuity:
• Major incident plans - such but incidents could result in
  – Evacuations
  – Disruption to business
  – Public or community involvement / awareness
  – Cost

And therefore responders could include:
• Snr Management
• Security
• Fire & Rescue Service and other external agencies
• Publicity
What are the costs of a spill? Discuss

A UK Water company was fined £15,000 for polluting a river, however, they also had to foot the bill for the following: (the hidden cost)

<table>
<thead>
<tr>
<th>Cost</th>
<th>Amount</th>
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<tbody>
<tr>
<td>Tankering away the chemical</td>
<td>+£32,600</td>
</tr>
<tr>
<td>Plugging the leak and installing leak detection</td>
<td>+£68,300</td>
</tr>
<tr>
<td>Fish Surveys &amp; restocking the river</td>
<td>+£89,500</td>
</tr>
<tr>
<td>Charge for EA officer time and prosecution costs</td>
<td>+£5,764</td>
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</tbody>
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**TOTAL additional costs** = **£196,164**

PLUS initial Fine of £15,000 **GRAND TOTAL** = **£211,164.00**

New fines are even higher!

Rejecting a recent appeal against a £250K fine, the court said that fines “had to bring home the appropriate message to directors and shareholders of the company” and could go as high as 100% of pre-tax profits.

- Cost of spill kit – A few hundred pounds
- Cost of Training – from a few hundred pounds to as little as £75 per person
- Cost of external support – free phone support and then costs as incurred.
External Agencies.

Of course in the event of a major incident we would still require support from external agencies. This could include:

- Fire & Rescue Service
- Police
- Environment Agency
- The Council
- The Local Authority Environmental Health (air pollution)
- Natural England
- Chemical Specialists
- Local Water Authority
- Highways Agency
- Professional Responders

Loughborough University is signed up to an external contractor for support. We use:

OHES 123 Response Service
Step 1: Call - Report the spill and expert incident advisors will give free advice over the phone on practical measures to minimise the impact.

Step 2: Mobilisation – a response team will be mobilised to the incident from the nearest response depot and will keep the site contact appraised of an ETA.

Step 3: Clean Up - A UK Spill Accredited Response team will physically contain and recover spilled product in the most efficient and effective manner.

Example of response and liaising with others:
- A14 spill of gas oil
OHES Training.

OHES: Learning Objectives of Spill Training

• To be able to respond promptly, safely and effectively to a recent spillage event and take appropriate pollution prevention actions utilising suitable equipment and techniques to mitigate damage where safe to do so.

• To recognise the different spill kit materials that are available to use on spills and to know which are most suitable for use on oil based spills and chemical based spills.

• To undertake some practical testing of spill kit materials in the field.
At Loughborough we deliver in house spill training - the course takes about 2 hours and covers the key principles of:

- What is pollution
- Pollution Prevention
- The costs of pollution
- Health & Safety
- Legislation
- Authorities
- Sites & Drains
- Spill Types
- Pollution Control Hierarchy
- Spill Kit
- Spill response
- Dry demonstration of kit deployment

Over 150 people at LU have been trained in basic Spill Response
Spill Kit.

Typical Spill Kit Contents

• Loose
• Pads
• Rolls
• Cushions
• Socks
• Booms
• Drain Mats
• Putty
Emergency Spill Exercise.

ISO14001 requires you to “periodically test the planned response actions, where practicable”

It can be used to:
• Raise awareness of spill response procedures
• Engage with other departments
• Involve Senior Management (business continuity)
• Engage with and build a rapport with external agencies
• Assess the effectiveness of your Emergency Spill Response Plan
• Identify deficiencies in site infrastructure and drainage
• Identify training requirements
• Assess spill kit provision on site
• Assists with ISO14001 compliance and continual improvement
Spill response plans aim to prevent a pollution incident, but are you ready if you do?

A remedial, restoration and reporting response plan should be ready to detail how you will respond to a pollution incident.

- Who you need to call for help
- Who you need to notify – internally and externally
- How will you mitigate the impact

It may be appropriate to prepare a voluntary Enforcement Undertaking Offer to mitigate the potential for prosecution:

- An Enforcement Undertaking enables an offender to address the offending in a constructive way and avoid the stigma and reputational damage of criminal conviction and the legal costs

Have you reviewed the form?
Do you know what you will need to discuss with Senior Management?
Workshop Content.

Group 1:
• What risks exist on your campus?

Group 2:
• How are you preventing pollution?

Group 3:
• Who do you think would benefit from training on spill response in your organisation?
Group Feedback.

Group 1:
• What risks did you identify?

Group 2:
• What pollution preventing methods did you discuss?

Group 3:
• Who do you think requires spill response training?
Summary.

Key Points:
• Risks
• Procedures
• Support
• Training
• Kit
• Senior Management
• Test
• Worst case scenario
Sharing the prize.

Thank you for attending.

Any questions?