

Wessex Water Services

Accident prevention and management plan

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1.0 Introduction

For waste environmental permits, there is an Environment Agency requirement for an accident prevention and management plan, for dealing with any incidents or events that could result in pollution, as a part of a written management system. [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits). As a part of the Industrial Emissions Directive implementation for digesters in the water industry; the five digestion Bioresources Centres (BC) within the Wessex Water will each receive an environmental permit through IED from mid-2021. Four of the BCs are covered by this document OPSP275. The fifth site Avonmouth BC will have an individual accident prevention and management plan, due to site size and complexity.

The four BCs covered are:

Site Name	Wessex Water Site ID	IED permit date
Berry Hill BC	13018	October 2021
Poole BC	11795	April 2021
Taunton BC	11798	January 2022
Trowbridge BC	11799	July 2021

Table 1: list of Bioresources Centres (BCs) covered by this Accident Management Plan

Please note: this document OPSP275 will be developed as each site is incorporated in line with the application timeline.

Sections 2 to 5 and Appendixes 1 to 2 are general sections and apply to all BCs. Section 6 is separated into site specific sections, and contains details of individual site plans, spill kit locations, and lists of substances present at the BC.

2.0 Plan Detail

This plan identifies potential accidents, for example equipment breakdowns, enforced shutdowns, fires, vandalism, flooding, or any other incident which causes an unexpected change to normal operations, such as bad weather, and the measures taken to reduce impact.

This plan only covers the sludge treatment installation permit assets at the relevant BC and does not extend into the adjoining Water Recycling Centres (WRC) and other waste activities on each site.

A breakdown of the risks and mitigations in place is in Appendix 1.

Appendix 1 uses Wessex Waters [Risk Management Process \(AMP002\)](#). Appendix 2 refers to AMP002 and details the probability/likelihood tables (Table 1) and environmental (Table 4) which are used to provide the ratings given in Appendix 1.

3.0 Plan Review

This plan will be reviewed as a minimum:

- every 5 years as per Wessex Water review policy
- in event of a new capital scheme at the sites affecting the parts of the IED process.
- following a major or significant accident or incident.

At the time of writing of this plan, the next minimum date for review will be 01/07/2026.

4.0 Recording, Investigating, and Responding to accidents

Your accident plan must also say how you will record, investigate and respond to accidents or breaches of your permit.

- Recording
 - Health and Safety accidents are recorded through either the phone or desktop app
 - [Health and safety observation/incident reporting application \(sharepoint.com\)](#)
 - Pollution incidents are recorded through the pollution register app either via laptop or a mobile phone power application. A customer service record (RAPID) is also required to be raised. Based on permission levels, at the minimum all staff are able to view pollution register and RAPID entries. Different groups of staff will also be able edit and update records.
 - [Pollution Register](#)
 - Customer Service (RAPID) call 0345 600 4 600
 - All Engineering & Sustainable Delivery (E&SD) Incidents must be notified by using [QF107](#) (Incident Reporting Form) in line with the Emergency Pollution Incident Response procedure ([QP024](#)).
 - Incidents requiring Environmental support, notify via instructions:
 - [Incidents affecting the Environment, pollution reporting & support \(sharepoint.com\)](#)
 - [Security breach and incident reporting form \(sharepoint.com\)](#)
 - [EA notification form \(Schedule 5\) \(EPF002\)](#)
- Responding
 - The overarching [GENG012 Management of an Incident in Operations](#) is designed to complement the knowledge and experience possessed by operational staff and can be used as a framework. This document will provide advice and guidance at any level. All operational staff who may involved in an accident or incident should familiarise themselves with GENG012.
 - Environmental
 - [Pollution Response guidance \(OPSG165\)](#)
 - [CMP018 Major oil/fuel pollution incident response \(sharepoint.com\)](#)
 - [Sites with oil and chemical spill kits available \(Production and Waste\) \(ROCG019\).pdf \(sharepoint.com\)](#)
 - [CMP002 Pollution of a designated bathing beach, recreational water, or shellfish water \(sharepoint.com\)](#)
 - [CMP004 Response to Chemical Ingress into sewer or WRC](#)
 - Site – General
 - [CMP005 Inundation of a WRC or SPS by a major flood event \(sharepoint.com\)](#)
 - [CMP006 Response to major failure of bulk storage tanks on wastewater sites \(sharepoint.com\)](#)
- Investigating and Reviewing
 - Operations investigate and review any accidents or incidents and make changes to management systems and other documentation such as maintenance schedules accordingly. Other departments such as health & safety, compliance & regulation and mechanical-electrical are to be involved as required. [GENG808 Debrief Guidance and Procedures](#) is available to assist in effective debriefs to identify good practice and areas for improvement.

5.0 Emergency Contacts

Your accident plan must also include:

- a list of emergency contacts and how to reach them
- The Wessex Water Business Continuity policy regarding key external contacts is GENG001:
 - [GENG001 \(Key External Contacts for Use With CMPs and LEPs\) \(sharepoint.com\)](#)
 - Including police, oil clean up contractors, mobile centrifuge contractors, tankering contractors, local council contacts, etc
- For incidents affecting the environment, see Source page
 - See [Incidents affecting the Environment, pollution reporting & support \(sharepoint.com\)](#)
 - A copy of the key information is contained in the table below, but refer to the [Source webpage](#) for the master information.

Body	When to Contact	Contact Info.
Internal (WW)	For any accident/pollution, requiring a response or ecological survey	environmental.incident@wessexwater.co.uk
Internal OHES (WW)	Out of hours ecological survey	OHES 0333 600 2424 and email: Response@ohes.co.uk copy in environmental.incident@wessexwater.co.uk and the Regional Pollution Manager
Internal (WW)	Non-urgent environmental queries	environmental@wessexwater.co.uk
Environment Agency	Any pollution incident to watercourse. Incidents resulting in fish/eel death. Breach of environmental permit conditions. Land pollution suspected to be CICS ¹ Category 1 or 2. Air pollution suspected to be CICS Category 1 or 2.	0800 80 70 60 (24hrs) And EA Notification form (Schedule 5) (EPRF002)
Natural England	For incidents affecting (or for works within) Sites of Special Scientific Interest (SSSI) , Special Areas of Conservation (SAC), Special Protection Areas (SPA) and/or legally protected species (such as Great Crested Newts, Water Voles, Badgers, Bats) You should ensure any works to deal with the incident cause as little	Inform Natural England as soon as possible (and within 24 hours) by email to: protectedsites@naturalengland.org.uk Main Contact Number - 0300 060 6000

¹ CICS = Common Incident Classification Scheme

Body	When to Contact	Contact Info.
Internal (WW)	For any accident/pollution, requiring a response or ecological survey	environmental.incident@wessexwater.co.uk
Internal OHES (WW)	Out of hours ecological survey	OHES 0333 600 2424 and email: Response@ohes.co.uk copy in environmental.incident@wessexwater.co.uk and the Regional Pollution Manager
Internal (WW)	Non-urgent environmental queries	environmental@wessexwater.co.uk
	damage to the special features as possible.	

Table 2: Key environmental agencies to notify in event of an accident affecting the environment

6. 0 Online security risks

There is an [information security management manual](#) which provides guidance for Wessex Water to demonstrate compliance with the [Information Security Policy](#). Wessex Water's Information Security Management System (ISMS) is accredited to ISO27001:2013.

Wessex Waters information security is taken seriously and there is an ongoing programme of ensuring operational technology (OT) such as outstations, telemetry, and control systems on sites; is aligned with the NIS (Network and Information Systems) Regulations. This involves increased monitoring and improved response to potential cyber security incidents, plus increased segregation of OT networks and devices and addressing security risks present due to legacy OT equipment. A cyber safe training module on iLearn is being rolled out for all staff.

7. 0 Site specific

7.1 Poole BC (11795)

Appendix 3 details the sensitive receptors surrounding Poole BC.

Note that Poole Harbour is a SSSI, SPA, RAMSAR and a Shellfishery. There are also designated bathing waters within Poole Harbour area.

Body	When to Contact	Contact No.
Marine Management Organisation	Where emergency works are below Mean High Water Springs (MHWS) they will require emergency Marine Licencing	0300 123 1032 (Emergency Marine Licence - 24hrs)
BCP Council	Issues affecting Poole Harbour	environment@poole.gov.uk 01202 261700 Environmental services contact information - Services in Poole
CEFAS	Issues affecting shellfishery	08459335577
Coastguard and Marine Offices	Significant or Major pollution to Poole Harbour	0203 8172000 MCA Head Office, Southampton

- Responding
 - [LEP054 Loss of Poole STW Site Offices Response Plan \(sharepoint.com\)](#)
 - [LEP001 Response to pumping station or inlet works failure Poole STW 13242 \(sharepoint.com\)](#)
 - [CMP017 Loss of UV site or major reduction in capacity \(sharepoint.com\)](#)
- Spill Kit use is governed by [TBT055 Toolbox Talk - Use of Spill Kits](#)
 - Poly make up room
 - Sludge tanker import area
 - Boiler house
- List of substances stored at site:

Treated sludge and storm effluent are also stored at site as a part of the WRC sewage treatment process and is not referenced in this section.

List of substances stored at site:	Storage facilities
Polyelectrolyte (for sludge stability)	Garage, drum room, by centrifuge
Oil for boiler and CHP maintenance	Boiler house
Antifreeze	In containers in boiler house
Diesel	One tank and a fuel cube
Antifoam	Burst dosing kiosks

Table 3: list of substances stored at Poole BC.

Note: Poole WRC Site Plan for the whole WRC site is detailed in ([WRG006 Site Waste Plan Poole](#)).

7.2 Trowbridge BC (11799)

Appendix 4 details the sensitive receptors surrounding Trowbridge BC.

- Spill Kit use is governed by [TBT055 Toolbox Talk - Use of Spill Kits](#)
 - Garage
 - Belt press building
- List of substances stored at site:

List of substances stored at site:	Storage facilities
Polyelectrolyte (for sludge stability)	Garage, GBT kiosk, belt press building
Oil for boiler	Boiler house
Antifreeze	In containers in boiler house
Diesel	Diesel tank adjacent to flare
Antifoam	Burst dosing kit adjacent to digestion plant and in garage.

Table 4: List of substances stored at Trowbridge BC

Note: Trowbridge WRC Site Plan for the whole WRC site is detailed in ([WRG001 Site Waste Plan Trowbridge](#)).

8.0 Revision history

Issue	Date	Description	Prepared by
1	March 2021	First Issue	Carolyn Dewhurst
2	May 2021	Second issue – review to include multiple sites.	Carolyn Dewhurst

Appendix 1 – Breakdown of the risks and mitigations

Risk Likelihoods and Impacts are assessed using Wessex Water [AMP002](#)

Category	Likelihood of impact	Magnitude of Potential Impact	Risk rating prior to mitigation	Measures to minimise the impact if the accident does happen / Measures to avoid the accident happening	Residual risk following mitigation
Equipment breakdowns	Medium	High	High	<ul style="list-style-type: none"> • Regular maintenance of critical plant • Monitoring on critical plant, linked to manned control room • Established consequence management plans to deal with incident. • Inhibits on tanks to prevent overfilling • Tank level monitors • Pump failure telemetry alarms • CMP018 Major oil/fuel pollution incident response (sharepoint.com) • Pollution Response guidance (OPSG165) • Guidance on response to telemetry alarms (ROCP200) 	Low
Spillages / leaks / loss of containment / overfilling of tanks	Low	<p>High Spillage and leakage could occur during fuel deliveries, vehicle refuelling (outside BC permit area), vehicle breakdowns/ accidents and or damage to tanks or bunds.</p> <p>Loss of containment could result in potentially polluting liquids (including oils) being discharged to drainage system or land outside permitted area.</p>	High	<ul style="list-style-type: none"> • Monitoring linked to control room installed on key tanks • Tanks are inspected regularly by site staff • Spillages are all self-contained via drainage system to RSPS1 (Return Pumping Station) • Minor spills cleaning up immediately • Established consequence management plans to deal with incident. • TRTWG768 11795 Poole Best Tankering Practice • TRTWG801 11799 Trowbridge Best Tankering Practice • CMP018 Major oil/fuel pollution incident response (sharepoint.com) 	Medium

Category	Likelihood of impact	Magnitude of Potential Impact	Risk rating prior to mitigation	Measures to minimise the impact if the accident does happen / Measures to avoid the accident happening	Residual risk following mitigation
				<ul style="list-style-type: none"> • Pollution Response guidance (OPSG165) 	
Fires	Low	High	High	<ul style="list-style-type: none"> • HSA25 Fire safety (sharepoint.com) • Fire management for Operational sites (TBT059).pdf (sharepoint.com) • ENVG008 Environmental Guidance Fire Emergencies (sharepoint.com) • Response to telemetry alarm about fire (ROCP208) (sharepoint.com) 	Low
Vandalism	Low	Medium Site could be subject to intentional vandalism by intruders, causing leaks or spills	Medium	<ul style="list-style-type: none"> • On site security measures (CCTV / security fencing / lockable gates) • Repairs undertaken as required • Requirement for visitors to sign in • Health & safety and security documentation - three yearly review plan (sharepoint.com) 	Low
Flooding	Low	Medium Site located within rivers and sea zone rating low risk ² . Medium Site located in high risk zone for surface water flooding ¹ .	High	<ul style="list-style-type: none"> • Established consequence management plans to deal with incident. • CMP005 Inundation of a WRC or SPS by a major flood event (sharepoint.com) 	Medium
Other - Power supply loss	Low	High	High	<ul style="list-style-type: none"> • On site back-up generators • Mobile back-up generators • Liaison with power supply providers • Regular maintenance of generators • Telemetry for mains failure linked to manned control room 	Low

² Environment Agency – [Long term flood risk - GOV.UK \(flood-warning-information.service.gov.uk\)](https://www.gov.uk/government/organisations/environment-agency):

Category	Likelihood of impact	Magnitude of Potential Impact	Risk rating prior to mitigation	Measures to minimise the impact if the accident does happen / Measures to avoid the accident happening	Residual risk following mitigation
				<ul style="list-style-type: none"> • Established consequence management plans to deal with incident. • CMP014 (Significant Broad Area - Power Supply Failures) (sharepoint.com) • Microsoft Word - BCIRP01 Widespread loss of power response plan (sharepoint.com) • Response to telemetry alarm about electricity failure (ROCP203) 	
Staff Operations	Medium	Medium	Medium	<ul style="list-style-type: none"> • Tank level monitors • Pump failure telemetry alarms • Training and development via Operator passport Treatment Operator Passport (TRTMAN059) and onsite training. 	Low

Appendix 2 – Wessex Water Risk Management Tables

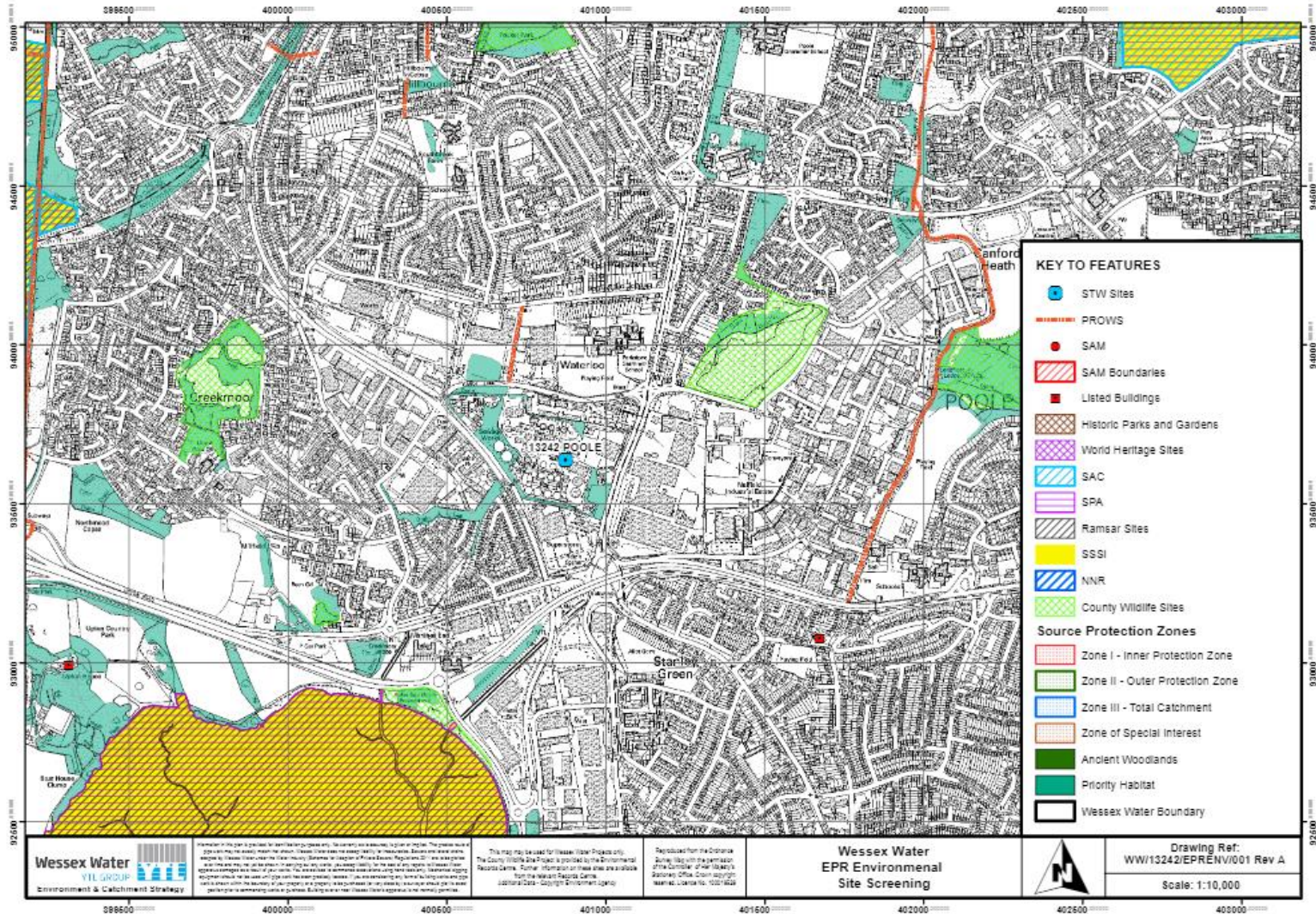
Table 1: Probability/ likelihood of occurrence

		Description	Likelihood
Very High	5	It is almost certain that the event will occur if the situation continues as it is	> 90%
High	4	It is very likely that the event will occur if the situation continues as it is	60 - 90%
Medium	3	It is foreseeable that circumstances may exist which result in the event occurring	40 - 60%
Low	2	It is unlikely that circumstances will combine to result in the event occurring	10 - 40%
Very Low	1	It is most unlikely that the event will occur it would require exceptional conditions	< 10%

Table 4: Environmental

Very High	5	Extreme environmental incident, resulting in irreversible or long-term widespread harm to environment; resulting in > 1 Cat 1 pollution incident
High	4	Major environmental incident resulting in significant impact requiring management by external authorities (EA,DWI) and high level of resources for response and remedy; resulting in 1 Cat 1 pollution incident
Medium	3	Moderate environmental impact requiring management response to aid recovery -reportable to authorities (e.g. fuel tank spillage); resulting in 1 or more Cat 2 pollution incident
Low	2	Local impact requiring management response, but from which there is natural recovery (e.g. recovery of fly-tip waste, silt into spawning river); resulting in 1 or more Cat 3 pollution incidents
Very Low	1	Minimal environmental impact (e.g. minor oil drips); resulting in 1 or more Cat 4 pollution incidents

Appendix 3: Poole BC Sensitive Receptors



Appendix 4: Trowbridge BC Sensitive Receptors

