

# **NORFOLK TRADITIONAL POULTRY LTD**

## ***ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN***

**Issued March 2020**

**Document Reference ENVR-003**

**Prepared by:**

**Green Sustain UK Ltd  
Cardiff Business Centre, Cardiff House; Cardiff, CF63 2AW**



**NORFOLK TRADITIONAL POULTRY**

***ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN***

<b>Report Reference Number:</b>	EMS – ENVR003
<b>Report Issue:</b>	Final – March 2020
<b>Client Review Date:</b>	March 2020
<b>Review Date:</b>	12 Months from issue date.

**NORFOLK TRADITIONAL POULTRY**  
***ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN***

**TABLE OF CONTENTS**

<b>Section</b>	<b>Page</b>
<b>1. INTRODUCTION</b>	<b>1</b>
<b>2. STRUCTURE OF ACCIDENT MANAGEMENT PLAN</b>	<b>2</b>
2.1. Requirements of New Guidance for Permitted Installations	2
2.2. Identification of Hazards and Assessment of Risks Associated with the Installation's Activities	3
<b>3. ACCIDENT MANAGEMENT CONTROL MEASURES AND PROCEDURES</b>	<b>4</b>
3.1. Introduction	4
3.2. Roles and Responsibilities	4
3.3. Incident Recording and Reporting	5
3.4. General Control Measures and Procedures	5
3.5. Improvement Measures	6
 <b>APPENDICES</b>	
<b>APPENDIX A</b>	<b>Spill Procedure</b>

# NORFOLK TRADITIONAL POULTRY

## ***ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN***

### **1. INTRODUCTION**

---

- 1.1. This Accident Management Plan has been prepared on Traditional Norfolk Poultry (“TNP”) by Green Sustain UK Ltd environmental consultant(s). An up to date Accident Management Plan is a requirement of the Environmental Permit; specifically, Section 1.2.
- 1.2. This plan is put into place in anticipation of an Environmental Permit – (application process submission April 2020). A Permit traditionally requests:
- “Condition 1.1.1(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints...”
- 1.3. There is currently a Site Crisis Contingency Plan; Reference No TE17P o the site QMS. This plan addresses many of the utility emergency scenarios. It addresses floods and fire, and has a comprehensive list of emergency contacts. The information within that plan is not duplicated here. Note – in the creation of this AMP, there were some additions to the TE17P to provide completeness of any environmental emergency. Additions were made for contact details of the local Environment Agency, and the Pollution Control department of the local authority (the site had already included the Environmental Health information of this authority).
- 1.4. At the time of this report compilation (March 2020) there are some ongoing physical pollution prevention measures planned (moving storage tanks/creating hardstanding areas). These improvements are addressed accordingly
- 1.5. At the time of the review compilation, the site Environmental Management System (“EMS”) is being completed. All procedures referred to within the document will be externally certified to an accredited UKAS Standard by autumn 2020.
- 1.6. There is 24-hour staff presence on site. Some areas are covered by CCTV.
- 1.7. This document is intended as a live document, and will be updated to include new items as they are developed. This report has been assigned an issue reference which fits in with TNP EMS numbering system.

## 2. STRUCTURE OF ACCIDENT MANAGEMENT PLAN

---

### 2.1. Requirements of new Guidance for Permitted Installations

---

2.1.1. A Permit application has been made in April 2020. The EA guidance (taken from <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits#accident-prevention-and-management-plan>) stipulates that any management plan must address:

- *You need a plan for dealing with any incidents or events that could result in pollution.*
- *The plan must identify 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.*

For each potential incident, it must also state the:

- *likelihood of the accident happening*
- *consequences of the accident happening*
- *measures you'll take to avoid the accident happening*
- *measures you'll take to minimise the impact if the accident does happen*

2.1.2. EA Guidance also states the following must be addressed:

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

Your accident plan must also include:

- *the date it was reviewed*
- *when it will next be reviewed*
- *a list of emergency contacts and how to reach them (described within TE17P)*
- *a list of substances stored at your site, and your storage facilities (listed within COSHH information, this is trained to relevant personnel, and several copies issued across the site).*
- *forms to record accidents on (ENV-F001)*

---

## **2.2. Identification of Hazards and Assessment of Risks Associated with the Installation's Activities**

---

- 2.2.1. Those activities at the Installation where accidents or abnormal operations could result in releases to the environment are identified in Appendix A. For each type of relevant operational activity at the Installation, the associated hazards have been identified, together with an assessment of the risk posed by the hazard.
- 2.2.2. The site's forthcoming application for an Environmental Permit is the catalyst for these investigations and assessments. A specified method of reporting will be required when the Permit is granted.
- 2.2.3. The risk assessment has been based on the likely frequency of occurrence of the event, what substance(s) could be released to the environment, the quantities of any such substances that could be released, the environmental fate of any substances (taking into account possible pathways and receptors), the effects of any such releases on the receptors identified and the risk reduction and control measures in place. In all cases, the scale and nature of the operations at the Installation have been taken into consideration.
- 2.2.4. For each hazard so identified, the associated contingency and mitigation measures in place at the Installation are also described.
- 2.2.5. As part of the site's target of achieving an externally certified EMS in 2020, a site Aspects Register was created in November 2019 (EMS reference ENVR-002). This was the first stage of formally identifying relevant environmental risks, and their appropriate mitigation.

### 3. ACCIDENT MANAGEMENT CONTROL MEASURES AND PROCEDURES

---

#### 3.1. Introduction

---

Accident management control measures and procedures at the Installation are based on a combination of suitable management measures and procedures and physical infrastructure arrangements (it should be noted, there are no external bulk chemical or oil storage tanks at the Installation). There is a comprehensive QMS at the site and some 'environmental' control procedures have been integrated into these documents. Relevant procedures amended are:

Relevant procedures are:

- Site Crises Contingency Response Plan;
- External Spill Response Procedure (created – ENVP-005)
- Roles and Responsibilities (updated – ENVP-001);
- Emergency Fire Procedures (included in contingency plan – amended to agree on firewater risk)
- Complaints procedure (amended to include environmental contacts).
- Site organogram (amended for environmental responsibilities).

An overview of the main arrangements at the Site are detailed below.

---

#### 3.2. Roles & Responsibilities

---

3.2.1. The roles surrounding the complete management of the site Environmental Programme is contained within controlled procedure ENVP-001: Roles and Responsibilities.

3.2.2. **The Director** and owner; Mark Gorton, is responsible for all overall activities (one of two Directors). He is responsible for setting company sustainability targets and providing appropriate resources for a suitable EMS/.

3.2.3. **The Factory Manager** (new in post. Employed in March 2020) will have responsibility of ensuring appropriate procedures are implemented. The FM is focused on incorporating lean manufacturing processes onsite, and all the communication channels to support. These communications (team talks, huddles) are undertaken twice a day on the shop floor. Any environmental improvement shall be communicated through these immediate channels.

3.2.4. **Technical Manager** is the company's Management Representative and will be responsible for the day to day implementation of a suitable EMS. He will be the main communicator with Regulators and is the driving force behind relevant company improvements. The site technical team is responsible for documenting environmental procedures through the existing QMS. The Technical Manager (and team) will implement any associated

procedures mentioned within this document, into the existing QMS or EMS (EMS in accordance with Phase III of the Standard BS8555).

- 3.2.5. Roles and responsibilities of all personnel involved in all aspects of environmental management, and therefore, appropriate accident management, are formally specified in the EMS (procedure ENVP-001)

---

### **3.3. Incident Recording and Reporting**

---

- 3.3.1. Currently all environmental incidents are recorded and tracked through the same process as Health & Safety items. To improve on this, a specific recording and reporting form has been issued as an EMS document. This sets out the exact information required to be investigated, and details of any further outside bodies (see below) are required to be notified. (ENVF-001).
- 3.3.2. In the event of successful application for an Environmental Permit. TNP is aware of the formal requirement of informing the Environment Agency, within the stipulated timeframe, any environmental release from the site. This will be through the notification process set out within (typically) Schedule 5 of the Permit. When the Permit is successful, the Schedule 5 notification will be issued to all nominated personnel.
- 3.3.3. The existing complaints and communication procedure has been amended to include details of environmental complaints and response(s).
- 3.3.4. TNP has made all key personnel aware of the procedures for contacting the relevant emergency services and external bodies, e.g. the Environment Agency, Local Authority, Whytes, utility and refrigeration company etc. Relevant contact numbers are displayed across the site (and included in Crisis manual).

---

### **3.4. General Control Measures and Existing Procedures**

---

#### **3.4.1. Substance Inventory**

TNP maintains an up-to-date inventory of substances used at the Installation. The data is compiled in correlation with the site COSHH system. This system is reviewed and updated regularly. External support is also made available (Holchem).

Any new chemical or substance used within the Installation would be assessed. They are stored in a dedicated locked, bunded storage facility.

#### **3.4.2. Preventative Maintenance Schedule**



TNP recognises that planned, preventative maintenance (“PPM”) is vital for ensuring optimum performance of site equipment and infrastructure, which, in turn, will reduce the risk of avoidable accidents taking place.

3.4.2.2 There is a comprehensive PPM schedule at the Installation. This is paper/hard copy based and has been designed by TNP themselves. Maintenance is undertaken by suitably trained personnel. Any specialist equipment (refrigeration, boilers) is subcontracted to specialist companies.

3.4.2.3 The Engineering Manager will liaise with any external specialist contractors, to assess if any additional items of plant etc are to be added to the maintenance schedule (example – new boiler purchase Spring 2020).

### **3.4.3 Management and Audit Review of EMS**

3.4.3.1. Within the Installation EMS there is a requirement for senior management to review and assess all aspects of the system. This involves the analysis of any incidents, correspondence with the EA (once Permit is in place), any corrective action carried out and the subsequent results of any follow up investigations.

3.4.3.2. It is the intention of the site to have the EMS externally certified (by a UKAS accredited system) by Autumn 2020. In accordance with the requirements of the EMS annual certification; relevant areas of the EMS are subject to an annual external audit. In addition to this (and as a requirement of the EMS) internal audits will be performed by personnel independent of the activity/process being audited.

### **3.4.4. Fire Response**

Fire is considered to be a risk, due to the potential risk of fire water run-off into the surrounding ground and water table. Fire marshal training is undertaken at the site.

---

## **3.5. Improvement Measures**

---

### **3.5.1. Current Waste Storage Arrangements**

There are three separated areas for waste storage across the site. Please refer to Drawing in Appendix 5 of the permit application document – ‘Emission Points and Relevant Storage Areas. The areas are coloured brown.

- W1 marks the Cat 2 and Cat 3 waste storage areas
- W2 marks the dry waste(s) storage
- W3 marks the General Waste and Recycling area.

#### Current Controls

The hazard assessment of this process has deemed W1 to be classed as medium risk, due to the storage of these containers/slips on unmade ground, and the associated risk of ground and groundwater pollution. There are current controls in place, such as the transfer of waste into receptacles undertaken by trained personnel, sealed skips, no liquids in these skips, containers/skips are covered to reduce risk of rainwater. The area is

constantly used and any evidence of leachate would be immediately notified to the skip supplier.

#### Improvements Identified

The site is currently developing the area (W1 and W2) along with the extension works, to cover the area with appropriate impermeable covering. There will be no drain access in this area, and no potential to run-off to unmade ground.

### **3.5.2. Current Liquid Effluent Storage Tanks**

There are two areas where waste effluent is stored in tanks, awaiting collection. Please refer to Drawing in Appendix 5 of the permit application document – ‘Emission Points and Relevant Storage Areas. The areas are coloured green. The failure of bulk liquid tank(s) S1 (Black Tanks) and S2 (Silver Tank) has been addressed as high risk. The risk being the potential to discharge process effluent to nearby unmade ground; and release to soil/groundwater.

#### Current Controls

The ‘Silver’ effluent tank (S2) has a visible fill level. Any accidental release, failure or overflow from this tank would be released to the surrounding containment drainage system – and collected (pumped) back to bank of ‘black’ tanks. This tank is deemed to be low risk.

The 3 x black tanks (S1) have level indicators. They are single skinned, although any overflow from them is recirculated to containment drainage system (gravity fed from top to storage sump). They are emptied several times daily. There are contingencies in place in the event the waste contractor cannot remove (waste would be tankered at considerable expense to local ETP as wastewater). The contract with waste contractor includes extreme weather measures.

Engineers in the area most of a 24-hour period. A visual display is used to assess how TNPI tank is. CCTV in the area.

#### Improvements Identified

W1 activity has been assessed as high risk as the current correct containment is reliant on daily removals by a third party. At the time of this report compilation (March 2020) the site is in discussions to increase containment capacity; to enable several days of effluent storage. Any new effluent storage facility would be provided with the appropriate secondary containment and alarms (possibly overflow/by-pass facility as is currently).

## **APPENDIX A**

### ***HAZARD IDENTIFICATION AND RISK ASSESSMENT***

Nature of Accident/ Abnormal Occurrence	Hazard	Risk Reduction Techniques in Place	Assessment of Risk	Contingency & Mitigation Measures in Place
<b>1. Liquid &amp; Hazardous Materials Storage, Handling and Transportation</b>				
<i>Transfer of food grade oils/chemicals from unloading to storage</i>	Spillage or failure of containment could potentially result release to areas not covered by hardstanding/concrete (and the associated contained drainage system), with potential to reach surface water or nearby unmade ground.	All chemicals (mostly for cleaning) brought to site in small containers (less than 205 litres – vast majority 25kg kegs). Unloading and transfer activities undertaken by trained TNP personnel. Minimal drains (or none) located in the transfer paths. No drains at all near the bunded storage area.	Low	Specialist spill absorbent materials and kept at relevant area(s). Specialist COSHH Training provided, includes handling and spill response.
<i>Chemical and food grade oil Transportation [across site]</i>	Very small amounts of engineering oil used sparingly in internal relevant areas. Spillage or failure of containment could potentially result release to areas not covered by hardstanding/concrete (and the associated contained drainage system), with potential to reach surface water or nearby unmade ground.	Transportation across site is minimal. When undertaken, transportation is generally by a small team of trained personnel, on foot. Cleaning chemicals are dispensed at nominated locations (set dosage) to minimise handling. Site personnel responsible for transportation are trained in chemical handling procedures, and relevant spill response procedures. Condition of containers is subject to ongoing visual inspection. Any internal spillage of oil or chemical (the majority of usage is within buildings) is captured by the contained drainage system.	Low	Specialist spill absorbent materials kept at site. Specialist COSHH Training provided, includes handling and spill response. Clean- up procedures for minor chemical and oil spills shall be undertaken in accordance with the materials usage instruction.

<i>Bulk Chemical Storage – Other (Nitrogen and CO2 and LPG)</i>	Spillage or failure of containment could potentially result in release to atmosphere. Considered low pollution risk due to nature of materials and quantities stored.	Tanks are visually inspected for signs of contents release/leak and entered into a PPM  Tank design accounts for the Physio-chemical properties of substances stored (to prevent corrosion).	Low	When designing Site Layout- consideration has been given to how access will be achieved during an emergency and periods of peak demand.  Engineering/Preventative maintenance procedures for these tanks considered sufficient.
<i>Product/Material Transference – Above Ground Pipework to receptacle</i>	Corrosion or failure of relevant pipework, and risk of release of potentially polluting ABP materials; particularly the ‘in-situ’ Cat3.  Pipework/‘chute’ failure could result in ABP material onto unmade ground.	Selection of correct/most appropriate pipework for substance being transferred (minimise corrosion - steel).  Preventative Maintenance schedule.  This area is visually inspected daily.  Skip on concrete.	Medium	Daily checks on waste distribution system from processing area to the ‘in-situ’ skip: ABP Cat 3.
<i>Non-Bulk Chemical and Oil Storage</i>	Failure of bunded storage area would result in to areas not covered by hardstanding/concrete (and the associated contained drainage system), with potential to reach surface water or nearby unmade ground.	Non-bulk process chemicals are delivered and stored in small containers, minimising large releases.  Lockable bunded storage is provided. Integrity of chemical storage areas is visually inspected as part of the PPM schedule.  Integrity of containers are checked prior to placing into storage.  Bunded storage in on concreted area with no drain access.	Low	Clean- up procedures for minor chemical and oil spills shall be undertaken in accordance with the materials usage instruction.  Stores of appropriate clean-up response materials are held on site and staff have been given relevant training in their usage.  Where deemed appropriate by trained personnel, small spillages will be suitably diluted and washed to the storm water drainage system, and subsequent contained drainage system.
<i>Red Diesel Unloading, Storage and transfer</i>  <i>(Support fuel tank 35sec red diesel)</i>	Diesel is unloaded into 2500 litre bunded tank. Release from the unloading and loading process would discharge to the ground and potentially reach areas of unmade ground in the vicinity.  As above, but with no risk of reaching unmade ground (area concreted).	The tank is new and double-skinned. The fill and unloading point is within the secondary tank (i.e. activity protected by bund).  All deliveries are supervised as the tank is locked. Only trained personnel can access.  1,000 litre new tank, on hardstanding. Spill kit next to it, deliveries supervised.	Low	Spill materials are in place near the tank.  The tank is entered onto a suitable PPM.  Spill materials are in place near the tank.  The tank is entered onto a suitable PPM. +

Nature of Accident/ Abnormal Occurrence	Hazard	Risk Reduction Techniques in Place	Assessment of Risk	Contingency & Mitigation Measures in Place
<b>2. Waste Transfer and Storage</b>				
<i>Dry Waste(s) Storage</i> <i>Cat 2, Cat 3, General and recycling</i> <i>(several tonne at one time)</i>	Leak of liquids of seepage/leachate, into unmade grounds beneath the storage skips and hence into groundwater.	Transfer into waste receptacles undertaken by trained personnel. No liquid wastes in skip Skips and trailers are covered – reduce risk of rainwater. Spills are cleared up immediately Area is constantly used. Any liquid evidence would be notified immediately.	Medium	Controls in place in the factory so no liquids are placed into waste containers. At particular risk is the ABP Cat 2 skip – this is collected frequently. (The structure of the skip is an important control measure that the supply company is aware of).  Employees respond immediately for any signs of spillage or leaching from waste receptacles. All skips covered at all times aside from directly filling.
<i>Transfer of waste dolavs across the Installation</i>	Spills of liquid/ABP materials to the floor of production areas, and areas around the waste skips	Transfer into waste receptacles undertaken by trained personnel. No liquid wastes in movable waste receptacles (dolavs) All process areas served by contained drainage system (no access to surface water).	Low	Areas in question are of low risk of access to the environment.
<b>3. Process Effluent Storage and Removal</b>				
Failure of bulk liquid tank(s) 3 x Black Tanks, 1 x Silver Tank Effluent Storage	Discharge of raw process effluent to potentially unmade areas; and release to ground/groundwater.	‘Silver’ effluent tank has a visible fill level. Any accidental release, failure or overflow from this tank would be released to the surrounding containment drainage system – and collected (pumped) by the bank of ‘black’ tanks. The 3 x black tanks have level indicators. Process is recirculated to containment drainage system (gravity fed from top to storage sump). They are emptied daily. Engineers in the area most of a 24 hour period. A visual display is used to assess how TNPI tank is. CCTV in the area. Capacity is reliant on a daily collection system from specialist waste management company.	High	The activity has been assessed as high risk as the correct containment is reliant on daily removals by a third party. There are contingencies in place in the event the waste contractor cannot remove (waste would be tankered at considerable expense to local ETP as wastewater). The contract with waste contractor includes extreme weather measures. <u>The site is in discussion with specialists to either –</u> <b>A)</b> Provide on site effluent treatment – with discharge to suitable receiving water (long term) <b>B)</b> Increase containment capacity; to enable several days storage to be retained (medium term).

Nature of Accident/ Abnormal Occurrence	Hazard	Risk Reduction Techniques in Place	Assessment of Risk	Contingency & Mitigation Measures in Place
<b>4. Fire</b>				
Fire at Installation	Uncontrolled emissions to atmosphere.	Several certified portable fire extinguishers located throughout the TNP site.  Fire Risk assessments up to date.	Medium	Appropriate fire training is delivered to all TNP staff. Fire Marshall list (external fire training every 2 years).
Firewater	Release of firewater to land, the surface water drainage systems and hence surface water (as any significant firewater collection would overload effluent storage capacity quickly).	Protection will be afforded to ground and groundwater as Site is covered by hardstanding.	Low	The fire service (attending the emergency) would be consulted as to whether a controlled burn, and hence reduce the production of firewater, would present a reduced environmental risk (due to the nearby water course).

Nature of Accident/ Abnormal Occurrence	Hazard	Risk Reduction Techniques in Place	Assessment of Risk	Contingency & Mitigation Measures in Place
<b>5. General Emergencies</b>				
Loss of Main Site Services (gas for Calor gas boiler and biomass, and mains electricity).	Given the nature of the operations at the Installation, it is considered that there are no significant environmental consequences that would arise from a power supply failure. Dependant on season, a small risk of odour could be present if refrigerated areas are down for a period of time with product.	Ongoing control by operational staff. Processes with contaminant emissions to air would cease in the event of total power failure (boilers).	Low	Operational staff will put installation equipment in a safe condition, and ensure that it is safely restarted when the supply is restored.  There are no abatement activities on site that are power dependant.  Services and utilities are addressed in the Site Crisis Contingency Plans – TE17P
Vandalism	Fugitive releases from site	The site has personnel in attendance 24 hours a day. Site is fenced and secured. The immediate properties surrounding the Installation are owned by the company (residential). Minimum amounts of external storage which potential vandals could access. CCTV system Locked chemical and diesel storage.	Low	
Noise (vehicles, malfunctioning external operations or equipment - chillers).	Resulting in noise nuisance for neighbouring premises.	Equipment located internally, minimising potential for noise to be heard beyond installation boundary. Chillers located externally have the risk of creating noise in the event of malfunction These are entered onto a PPM and are serviced Nearest residential properties are owned by the company.	Low	In the event of a noise emission, investigative steps will be undertaken to establish source. Any faulty equipment shall be immediately shut down. If the external chillers are responsible, specialist support is available. Complaints will be followed up and appropriate documentation retained. (as part of company existing complaints procedure). If applicable, the EA will be notified using the reporting mechanism identified within the Permit (Schedule 5).



Nature of Accident/ Abnormal Occurrence	Hazard	Risk Reduction Techniques in Place	Assessment of Risk	Contingency & Mitigation Measures in Place
<b>6. Emergency releases to atmosphere</b>				
Unplanned release of pollutants to air	There are two small boilers on site. In the event of malfunctioning, it is possible that combustion pollutants could be released to the atmosphere.	Boilers are serviced within a preventative maintenance schedule. This ensures combustion is working to optimum efficiency. Boilers are serviced by external contractors. Tight restrictions surrounding fuel for biomass boiler. Certification and content guarantee to ensure optimum, smokeless combustion.	Low	As part of the Permit management (when received) TNP will notify the Agency if any event occurs smoke or issues with the emission to air points. As part of mitigation investigations, TNP shall evaluate if appropriate preventative maintenance and/or operator training is in place.
Release of dust/particulates	Unloading and moving of certain materials and waste streams across the installation could result in the occurrence of dust/particulate release.	Unloading of relevant raw materials (those which have the potential to cause pollutant/dust/particulate release) is done within buildings. Site vehicles moving materials around site are covered. All relevant storage areas are internal.		The operator will notify the EA in the event of a fugitive release which may cause pollution. Where operator or procedural error is identified as the cause, a CAR (corrective action report) will be issued as part of the EMS protocol.
Release of refrigerants	Small amounts of R404a and R452a are used on site	Regular PPMs on systems. Specialist contractors used to compile registers/leak testing	Medium	Risk classed as medium, as even though site has small quantities, R404a has high GWP. Plans for replacement R404a in place. See information PPMs/External maintenance.

## **APPENDIX B**

### ***SPILL PROCEDURE***

# SPILL PROCEDURE

1. Act fast. Stop work immediately and identify the source of the spillage.
2. Prevent further spillage if possible without endangering yourself.
3. Contain or limit the spill to stop it spreading using absorbent materials from a spill kit or sand / earth.
4. Protect sensitive areas such as rivers, ditches or surface water drains with bunds or drain covers.
5. Emergency Spill Kits are located: in the TNP Factory Workshop – Upstairs racking.
6. Contact the site Technical Manager for major spillages or where the spillage is likely to enter a watercourse or surface water drainage system. Contacts below.
7. Bag up used absorbent pads or sand and dispose of appropriately. Materials contaminated with hazardous substances such as oil must be disposed of as hazardous waste.

MARK GORTON COMPANY DIRECTOR	01953 498434 01953 497181	07768 757456	<a href="mailto:MARK.GORTON@TNPLTD.COM">MARK.GORTON@TNPLTD.COM</a>
<b>STEPHEN ALLEN</b> - TECHNICAL MANAGER <b>FIRST POINT OF CONTACT FOR ANY INCIDENT</b>	01953 498434 01953 497182	07795 382 329	<a href="mailto:TECHNICAL@TNPLTD.COM">TECHNICAL@TNPLTD.COM</a>
<b>JAMES LAMBERT</b> AGRICULTURAL MANAGER	01953 497434 01953 497188	07384461163	<a href="mailto:JAMES.LAMBERT@TNPLTD.COM">JAMES.LAMBERT@TNPLTD.COM</a>

Contact details for service and chemical providers available in TNP Incident Management Procedure (QMS document TE17P).

Doc Ref	Issue No	Issue Date	Author	Approved By	Page
ENV-P05 Spill Procedure	2	23.01.18	D Foulkes	Managing Director	1 of 1