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## 1. Safety

Any person carrying out any of the following instructions shall do so in accordance with United Utilities Ltd. Blue Book and all Generic Risk Assessments (GRAs), details of which are contained in United Utilities Ltd. Health and Safety Policy – Organisations and Arrangements document and available via the UU intranet site.

If in carrying out this instruction, it is not possible to rectify any problem encountered within a reasonable timescale, the Production Manager or senior equivalent person must be contacted.

All other applicable regulatory and statutory requirements shall be observed at all times.

Detailed operating instructions, control philosophies and technical information may be found in the following;


- Process Loss Contingency Plans
- Compliance Action Plans
- Environmental Permits
- Accident, Incident and Emergency Management Plans
- Drainage Plans
- Environmental Risk Assessments
- O & M Manuals
- Control Philosophies

## 2. Responsibility

All Standard Operating Procedures, Instructions and other documented operational procedures and activities are to be carried out by the Process Controller or other trained person designated by the Production Manager.

If in carrying out the instruction, it is not possible to rectify any problem encountered within a reasonable timescale, the Production Manager or senior equivalent person must be contacted.

Any operational problem that cannot be dealt with by normal operational procedures shall be classed as an INCIDENT and the current issue of UU Incident Management Procedure shall be referred to and SOP WP.S/001 Incident Response.

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All actions and communications carried out while applying any Standard Operating Procedure, Instruction or other documented operational procedure or activity shall be recorded using form WwP/F/001/31/08 Site Diary Log.

### Objective

To safely minimize the business and environmental impact of a flood or spillage affecting this facility and to ensure a return to normal operation as quickly as possible.

These guidelines set out best practice for producing an incident response plan to deal with an environmental incident on your site. Following such a plan will help you to prevent or reduce environmental damage if such an incident occurs.

Within the Environmental Permitting Regulations 2007 reference 3 under these regulations there is a statutory obligation to have an incident response plan in place.

This procedure shall be considered as the Flood Risk and Spillage Plan as required by EP (PPC) permit.

Site Address:	Blackburn WwTW, Cuerdale Lane, Samlesbury, Preston, PR5 0UY
Person in Charge:	Alan Evenson / Robert Jackson / Gary Mayal (Process Controllers)


This procedure contains the following section:

- Spill Plan
- Flood Plan
- Incident Response Plan

### Spill Plan

This spill plan shall include provision for catastrophic failure of large vessels and containment of accidental spillages.

A site drainage plan shall be maintained by the Production Manager and displayed for permitted sites. This will be kept alongside the inventory of chemicals and products and the incident response plan. Where sensitive surface water drains are identified on site these will have the above ground iron works marked in blue paint and additional precautions regarding possible contamination from spills will be taken.

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## Spill Kits

Appropriate spill kits shall be located on site. The spill kits should be appropriate for oil spillages and general spillages, including sludge (this may include drain covers or sandbags to divert sludge away from drains). Consideration shall be given to the size of spillage / spill kit.

An assessment shall be made regarding the appropriateness of chemical spill kits. This shall take into account the type of chemicals held on site, COSHH assessment, adequacy of containment and quantity of potential spillage.


All staff shall be trained on the use of spill kits and shall be made aware of the location of all kits. Arrangements shall be made for appropriate disposal of the used kits and the quick replacement of spill kits, following use. Arrangements shall also be made for the training of staff in the proper emptying and disposal of bunds and blind tanks which contains spillages.

## Spill Response

- Identify the spill type and assess the risks
- If a spill occurs, the spillage shall be contained and not allowed to escape and cause harm to the environment
  - Seal drains within the vicinity of the spillage (if harmful to the wastewater treatment works or controlled waters)
  - Position booms to contain the flow of spillage
  - Use spill pads
- Wear suitable PPE
- Identify and stop source of spillage
- Clean up the spillage using spill kit, wash down the facility. Tanker may be used
- Dispose of any contaminated material through a licensed operator. Liaise with your Environmental Regulator Advisor (ERA)
- Spills that contain chemicals, diesel or oil should be considered as hazardous waste and must be disposed of in an approved manner. Seek advice from your ERA

If the site is operating under an environmental permit all spillage events shall be recorded. A Schedule 5 EA Notification may also be required. Refer to your permit and liaise with your ERA for guidance.

For spillages to gravel areas an assessment shall be made if adequate cleaning / wash down of contaminated gravel can be achieved i.e. moving gravel to hardstanding area, with suitable drainage back to the head of the works, for cleaning. If this cannot be achieved contaminated gravel shall be removed from site in an appropriate manner and replaced.

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### Site Chemical, Product and Waste Inventory

An up-to-date inventory of all substances stored on-site, together with an indication of the maximum quantity likely to be stored shall be maintained. Any product data sheets and COSHH assessments for any substances posing a risk to people and/or the environment shall be attached.

For permitted sites a site plan shall be maintained by the Production Manager; this shall indicate all stores, bulk storage vessels, drums or containers that you use for storing oils, chemicals or other potentially polluting materials. Any oils or chemicals regularly stored away from fixed installations or storage areas in any significant quantity shall be indicated on the site plan.


All emergency responders shall have access to this inventory and, if possible, it shall be distributed as part of your emergency planning process.

Records shall be maintained of the spill kit equipment and materials, their inspection and use held on site to deal with pollution incidents. For example:

- Absorbents and granules
- Drain mats / covers
- Pipe blockers and temporary bungs
- Booms
- Pumps
- Sandbags

### Flood Plan

The flood plan is required to minimize the impact of flooding from river or watercourse or other localised surface water flooding from off site. If site has an Environmental Permit (for PPC purposes), the fluvial flood risk assessment, contained within the Flood Risk and Spill Plan shall be considered. The following action shall be completed and tested on site. This covers notification of EA Flood Watch Warning to post flood operations

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## Action Plan

### Phase: Flood Watch advised by Environment Agency

Action	Responsibility	Resources
1. Notify the Person in Charge	Auto text / email system to Area Manager	N/A
2. Notify Department Managers	Area Manager	Department Managers contact details
3. Hourly / half-hourly flood watch patrol to monitor and report river level to FERP Team (Flood Emergency Response Plan Team see internal and external contact below)	Process Controller	Contact details listed below (see section 3)

### Phase: Flood Warning / Severe Flood Warning advised by Environment Agency or river levels visibly rising / impinging on the site

Action – If Appropriate	Responsibility	Resources
1. Person in Charge initiates the plan	Process Controller	Copy of the Flood and Spill Plan
2. Relocate key equipment	Technical Officer / Process Controller	N/A
3. Power down electrical units	Process Controller / FSE	N/A
4. Protect sensitive areas with flood protection e.g. sand bags	Process Site Staff	Flood protection / diversion materials
5. Secure objects that could float in floodwater. Skips, Gas bottles, etc.	Process Site Staff	Flood protection / diversion materials
6. Relocate vehicles	Vehicle owner	N/A
7. Check floor drains to ensure they are clear and continue to monitor	Process Site Staff	N/A
8. Shutdown and drain flammable liquid piping	Technical Officer / Process Controller	N/A
9. Isolate gas supplies	Technical Officer / Process Controller	N/A



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### Phase: During Flood

Action	Responsibility	Resources
1. If safe to do so have personnel remain on site to prevent unauthorised access	Technical Officer / Process Controller	N/A
2. Hire pumps to remove water from buildings / site areas	Technical Officer / Process Controller	N/A
3. Notify the FM Global Customer Service Desk	Production Manager	N/A

### Phase: Post Flood

Action	Responsibility	Resources
1. Check flooded buildings for structural stability and safety before starting clean-up inside	Site SHE Advisor	N/A
2. Check for spilled contaminants and eliminate before other work begins	Site SHE Advisor	N/A
3. Clean and dry equipment, prioritizing vital or susceptible equipment	Process Site Staff	Space Heaters
4. Remove standing water from the facility	Process Site Staff	Brushes, pump, hose etc.
5. Check, clean and test all electrical distribution equipment and components exposed to flooding or humidity	Electrical FSE	N/A
6. Dehumidify damp areas and dry wet insulation and building materials	Process Site Staff	Specialist Contractors
7. Remove flood debris	Process Site Staff	Skips, brushes, gloves etc.
8. Return and keep fire protection systems in service (clean-up can result in large piles of combustible materials)	Process Site Staff	N/A
9. Check on-site and local bridges, culverts, drains etc. to ensure they are free of debris	Process Site Staff	N/A
10. Implement plan to resurrect process / part of process impacted by flood	Technical Officer / Process Controller	N/A
11. Debrief all key personnel and update / modify the FERP where appropriate	Production Manager / Technical Officer	N/A

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### 3. History

#### Common Problems and their Solutions

Problems	Solutions
Potential for accidental spills of sludge, oil, chemicals due to nature of work on operational site	Follow accident management plan, use spill kits on site, and contact ERA for advice regarding appropriate remediation and EA notifications (where necessary)

#### Incident Response Plan

Flood and Spillage - Incident Response Plan	
Name, address and location of site:	Blackburn WwTW, Cuerdale Lane, Samlesbury, Preston, PR5 0UY
Overview of the spill risk activities on site:	See Environmental Accident Management Plan and Environmental Risk Assessments within permit application
Source of potential flood and risk of flood:	Surface water flooding onto the site from the surrounding land; and Surface water flooding on the site due to flooded drainage
Description of surrounding area (hardstanding areas, permeable areas, etc.)	See introductory note within PPC permit
Name of person responsible for compiling the Plan:	Mark Nixon
Review date:	March 2023
Date of next Incident Response Exercise:	March 2024
Detail location of Site Plan and Chemical Inventory, held on site:	COSHH Register – PC's office

External Contacts		
Organisation	Contact Person	Phone Number
Environment Agency	Kate Elliott	
FM Global (Insurer)	Keith Davies	
FM Global Customer Service Desk	Helpdesk	
Police	Emergency Operator	999
Fire Brigade	Emergency Operator	999
Ambulance	Emergency Operator	999
Electrical contact	FSEs via Resource Coordinator / AMC	01772 227 177 0345 026 7663
Gas supply contractor	N/A	N/A
Plant hire (dehumidifiers, emergency generators, etc.)	Purchase Card Assistants Plant Desk	0345 050 0005
Key equipment manufactures	Supply Chain Buying Assistants	0345 050 0005
Equipment repair companies	Dan Jones	



Wastewater Treatment

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Internal Contacts (Emergency Response Team) (ERT)		
Role	Employee	Contact No:
Person in Charge	Martin Gilday Alan Evenson Gary Mayal	
Area Production Manager	Mark Nixon	
Area Business Manager	Simon Holden	
Health and Safety Rep.	Nicolas Williams	
On site response team: (list names)	Site Staff via Martin Gilday	
ERA	Peter Towne	
Others:		



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Annual Review of Incident Plan	
It is a legal requirement to regularly test the plan. This is to validate the whole plan, to ensure it works and to develop competencies of staff involved in emergency response. The date of all Incident Plan tests shall be recorded.	
Date Completed:	Date
Completed by:	Name
Requirements of Annual Review / Test:	
<ul style="list-style-type: none"> <li>• Involve all key personnel, review the flood plan and update if needed</li> <li>• Check site is on Environment Agency Flood Register and details are correct</li> <li>• Review and if necessary update contents of sites Accident Management Plan, Emergency Plan, site chemical inventory plan and Drainage plans</li> <li>• Conduct training for Emergency Risk Team (ERT) and ensure members have a copy of the plan</li> <li>• Conduct a test of the plan to determine how long each step will take</li> <li>• Ensure the plan covers all shifts and weekends</li> <li>• Define the point at which the plan will be activated, leaving enough time to carry out each step</li> <li>• Make sure ERT members know how to properly construct sandbag walls and drain stoppers</li> <li>• Review possible exposures that could affect the facility during flood i.e. neighbouring facilities yard storage, service interruptions, potential access problems</li> <li>• Survey the facility to identify key equipment that should be relocated, and manufacturer / repair contact details recorded</li> <li>• Survey the facility to identify any equipment that will float in a flood and how they can be anchored down</li> <li>• Check culverts, bridges, and drains to ensure they are not blocked and are properly maintained</li> <li>• Check non-return valves on drain and sewer outlets are in working order (prevents water from entering the site from back-up)</li> <li>• Check that flood materials i.e. sandbags and clean up equipment are on-site</li> <li>• Check the condition and location of floor doors and shields to make sure they are assessable and ready to install</li> <li>• Ensure electrical and gas utility shutdown procedures are current and posted</li> <li>• Test and confirm sump pumps are operational</li> <li>• For spillages caused by catastrophic failure please refer to Process Loss Contingency Plan</li> <li>• Ensure spillage site plan and chemical inventory are up to date and available</li> <li>• Ensure all spill kits are available and fit for purpose</li> </ul>	
Lessons learnt:	