	Wastewater Services	Reference: WWP/S/001/01/14
		Version: 6 Issue date: 01/02/2021 Expiry date: 01/02/2023
EPR Waste and Installation Incident Notification and Reporting SOP		

Standard Operating Procedure

EPR Waste & Installations Incident Notification and Reporting

1. Purpose

This Standard Operating Procedure (SOP) details the requirements, practices and supports the training required to notify and ultimately submit a Part A incident report to the Environment Agency.

The purpose of this SOP is to ensure that all legal reporting requirements are met as detailed in the site permit to notify, record and report in a consistent, timely and compliant manner.

2. Scope

This SOP applies to all EPR Waste & Installations permitted sites.

From an environmental incident occurring to formal reporting of the incident to the Environment Agency (EA) as per the site’s permit conditions.


3. Definitions

Notification under Environmental Permitting (England and Wales) Regulations 2016 it is a requirement to notify the Environment Agency “without delay” upon detection of any of the following within the permitted installation boundary: -

- Malfunction, breakdown or failure related to equipment or techniques (where these have the potential to, or have caused, significant environmental damage / pollution).
- Breach of a limit specified with the permit.
- Any significant adverse environmental effects.

Installation Boundary / Permit boundary

- This is the boundary identified within the Permit for the site. This can be found in the site Permit and on the site Notice Board.

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The most appropriate person

- This shall be a member of staff who carries out activities within the installation / site boundary.
- Normal working hours
- Between the hours of 8am and 4.00pm Monday to Friday

Outside normal working hours

- Between the hours of 4.00pm and 8am, Weekends and Bank Holidays.

Event / Incident

- Please refer to *United Utilities Incident and Crisis Management Policy and Procedure, Departmental Sub-Procedures and Processes: Environmental Compliance*

4. Procedure


The ERA is required to telephone their EA Local Waste or Installations Officer immediately on being made aware of an issue which meets the criteria listed in Section 3.1 Notification. This does not apply to matters which occur on a non-working day or outside normal working hours. Should the ERA be unable to contact the local EA officer then they must contact the EA hotline 0800 807060 to report the incident and record the reference number.

Should an incident occur on a non-working day or outside normal working hours. ICC will refer to *United Utilities Incident and Crisis Management Policy and Procedure, Departmental Sub-Procedures and Processes: Environmental Compliance Team* to assess the impact and action required. If the incident is deemed to be reportable ICC will report the matter directly to the EA Incident Hotline 0800 807060 providing the information as detailed in Appendix B of the *United Utilities Incident and Crisis Management Policy and Procedure, Departmental Sub-Procedures and Processes: Environmental Compliance Team*.

The ICC will include details of the event or incident on the Daily ICC Response Manager Report to be received by the ERA team and Environmental Performance Lead ERA.

ERA must submit form PART A or Schedule 5 as detailed in the site permit to the local EA Officer within 24 hours of detection of the initial incident. Should the event fall on a non-working day then the submission must be made by 12:00 midday of the next working day.

Part A or Schedule 5 forms must be approved by the Environmental Performance Lead ERA.

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Should the Lead ERA consider the matter to be of a serious nature, then the Head of Environmental Performance and UU Legal are to be briefed BEFORE Part A or Schedule 5 submission.

When completed and approved the Part A or Schedule 5, together with any relevant evidence, should be sent to the local EA officer via email ensuring the following mailboxes are also copied in

- Waste Compliance (UU internal mailbox)
- EA Correspondence (UU internal mailbox)
- gmmc.installations@environment-agency.gov.uk (Manchester, Merseyside and Cheshire only)


Failure to submit a Part A within the required timeframe will result in a CCS4 score against the site for non-reporting, in addition to any CCS scores received for the actual incident.

Part A and Schedule 5 documentation, together with any relevant evidence must be stored in the ERA SharePoint folder under EA Part A Notifications here [EA Part A Notifications](#)

The ERA will raise an Airline action for the Production Manager to complete a Post Incident Review (PIR) following the Part A submission to ascertain the root cause of the failure causing the incident, details of which can be included in the Part B submission to the EA.

‘As soon as practicable’ and following approval from the Lead ERA the PART B form should be submitted by the ERA to the EA. This should include a Post Incident Review Third Party summary report, any mitigations and control measures which will help to ensure the event is not repeated (company-wide).

If a Part B cannot be submitted the EA must be notified within **21 days** from submission of the Part A / Schedule 5 relating to the event.

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Process flow chart below.

Step	Activity	Notes
Incident Notification	<ul style="list-style-type: none"> The most appropriate person shall notify the site ERA or ICC of the event / incident immediately upon detection by telephone or in person 	<ul style="list-style-type: none"> During normal working hours notify the site ERA directly at the earliest opportunity. During outside normal working hours notify ICC All incidents should be raised through the ICC It is the responsibility of site staff to report any potential incidents or events to ICC.
	<ul style="list-style-type: none"> During normal working hours the ERA will contact the local EA officer and advise them of the issue. Outside of normal working hours ICC contact the EA via the hotline 0800 807060 	<ul style="list-style-type: none"> Outside of normal working hours - Information to be provided to the EA is detailed in Appendix B of <i>United Utilities Incident and Crisis Management Policy and Procedure, Departmental Sub-Procedures and Processes: Environmental Compliance</i> Should the ERA be unable to reach the local EA officer to advise of an incident then they must contact the EA Hotline to report and obtain the reference number.
	<ul style="list-style-type: none"> ICC will include the details of all events and incidents on the Daily ICC Response Manager Report 	<ul style="list-style-type: none"> All ERA's and Environmental Compliance Lead receive a copy of the Daily ICC Response Manager Report. It is the responsibility of the ERA to check the report.
Part A Notification	<ul style="list-style-type: none"> ERA collates information from relevant operational staff. 	<ul style="list-style-type: none"> This will require input from relevant personnel, including but not limited to the Production Manager, Production Engineer, Technical Officer, CHP Staff, Process Controllers and Process Operators.
	<ul style="list-style-type: none"> ERA assesses the incident to determine if a Part A / Schedule 5 notification is required to be submitted to the EA. 	<ul style="list-style-type: none"> ERA makes assessment of incident against the permit and guidance.
	<ul style="list-style-type: none"> ERA completes a Part A / Schedule 5 notification if required. ERA submits this to Environmental Compliance Lead to obtain authorisation to submit. ERA gains approval from the Lead ERA and submits the document to the local EA officer including gmmc.installations@environment-agency.gov.uk, Waste Compliance internal Mailbox and EA Correspondence internal mailbox 	<ul style="list-style-type: none"> Within normal working hours the ERA must obtain approval from the Lead ERA and submit the Part A / Schedule 5 within 24 hours of the incident being detected. Outside normal working hours the ERA must obtain approval from the Lead ERA and submit the Part A / Schedule 5 by 12:00 midday of the next working day. Approval is required from the Lead ERA before any Part A / Schedule 5 submission unless there is a risk of missing the deadline, then the ERA should escalate to the next level of management and if this is not possible, then submit the Part A / Schedule 5 and seek retrospective approval from the Lead ERA at the earliest opportunity. Part A and Schedule 5 templates are provided in the individual site permit. gmmc.installations@environment-agency.gov.uk is for Manchester, Merseyside and Cheshire areas only
	<ul style="list-style-type: none"> ERA saves Part A / Schedule 5 document on ERA sharepoint ERA updates the Site Environmental Permit Event Log (formerly PPC log) to include time and date of notification being submitted. ERA raises an airline action on the 	<ul style="list-style-type: none"> All Part A's and Schedule 5s are saved here EA Part A Notifications

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	Production manager to complete a Post incident review within 21 days of the incident occurring or as soon as practicable.	
Part B Notific ation	<ul style="list-style-type: none"> ERA attends a Post Incident Review meeting to collate further information of the incident including a timeline of events, details of the breach and why it occurred, any immediate and preventative actions taken and lessons learnt A final report for internal purposes only is prepared at the end of the investigation by the Post Incident Review lead. The ERA will create a Third Party Summary Report for onward distribution to any relevant external third parties. 	<ul style="list-style-type: none"> It is the responsibility of the Production Manager to schedule the Post Incident Review once the incident has concluded to instigate the route cause failure analysis. This will require input from relevant personnel, including but not limited to the Production Manager, Production Engineer, Technical Officer, CHP staff, Process Controllers and Process Operators For incidents resulting in biogas emissions to air then it is preferred that a Kelvin Top Set methodology is used for the route cause failure analysis.
	ERA completes the Part B submission in a timely manner and requests authorisation from the Lead ERA before submitting to the local EA officer and including Waste Compliance internal Mailbox, EA Correspondence internal mailbox and gmmc.installations@environment-agency.gov.uk	<ul style="list-style-type: none"> gmmc.installations@environment-agency.gov.uk is to be included for Manchester, Merseyside and Cheshire areas only
	ERA will provide a 21 day Post Incident update to the local EA Officer if a Part B has not been submitted by this time.	

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5. Record Keeping

All incidents as defined in Section 3.1 should be recorded in the Site's Environmental Permit Event Log

Notification made to the Environment Agency should be detailed in the Site's Environmental Permit Event Log. This should include the following information:

- Time and date of incident / event
- Description of plant / process issue
- Action taken to resolve
- Date / time complete and site returned to normal operation
- Recorded by
- ERA informed Y/N
- Part A / Schedule 5 issued
- Time and date of submission
- Submitted by
- Any further comments

Records of all Part A and associated Part B submissions made to the Environment Agency should be saved in the Environmental Compliance Team sharepoint folders [EA Part A Notifications](#) and [EA Part B Submissions](#) and logged with the Central Services Team. This information is important for the UU - EA Commitments Log.

Post Incident meeting notes and summary reports should correspond with information provided in Part B submission forms.

6. References

- Site specific Environmental Permit (Section 4.3 "Notifications", Sub Section 4.3.1 and 4.3.2 and relevant Schedule as described in this subsection)
- Site Environmental Accident Management Plan
- Site Odour Management Plan
- Site Flood Risk and Spill Plan
- United Utilities Incident and Crisis Management Policy and Procedure, Departmental Sub-Procedures and Processes: Environmental Compliance
- "How to comply with your Permit" EA Guidance Document
- Post incident review document.