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Accident Management Plan EPR/LP3127SM V2

Stockport Wastewater Treatment Works Bioprocessing

Eco Clarity Wastewater Services Limited

Report No. CRM.597.003.PE.R.003.B

'Experience and expertise working in union'

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Accident Management Plan EPR/LP3127SM

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For:	Eco Clarity Wastewater Services UK Limited
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Site details

Site name: **Stockport Sewage Treatment Works**

Site address: **Swythamley Road, Cheadle Heath, Cheadle, Stockport, SK3 0NE**

Operator name: **Eco Clarity Wastewater Services UK Limited**

Permit number: **EPR/LP3127SM**

Document owner

- **Document author: Jane Hall BSc(hons) CEnv FCIWM, Enzygo Limited**
- **Version number: 2**

List of revisions

Revision number	Revision authorised by	Date submitted to Environment Agency	Revision owner
1	Chris Clemes	8 October 2025	Bogdan Bujor
2	Chris Clemes	29 October 2026	Bogdan Bujor

1.0 Introduction

1.1 Overview

1.1.1 This Accident Management Plan (AMP) has been prepared to support Eco Clarity Wastewater Services UK Limited's technical submission to support the application for a Permit Variation to Environmental Permit EPR/LP3127SM. The proposed changes are to the Stockport Wastewater Treatment Works Bioprocessing Facility.

1.1.2 The Facility is Operated by Eco Clarity Wastewater Services UK Limited whose registered office is 36 Scotts Road, Bromley, England, BR1 3QD. The Company Number, as registered on Companies House, is 12842022.

1.2 Scope of the Plan

1.2.1 The plan covers all operations and activities associated with the Fats Oils and Grease (FOG) Treatment Facility, including offloading, storage, treatment, and discharge. It considers mechanical failures, human errors, external threats, and extreme weather events.

1.3 Responsibilities

1.3.1 The Site Manager is responsible for implementing the AMP and ensuring all staff are trained. Emergency responsibilities and contacts are clearly outlined in the facility's Environmental Management System (EMS).

1.3.2 The operator will Ensure all staff are trained in accident prevention and emergency response procedures and will maintain records of training and competence assessments.

1.4 Site Description

1.4.1 The FOG Treatment Facility is located within the Sewage Treatment Works (STW) at Cheadle Heath, Stockport. The full site address is:

Stockport STW
Swythamley Road
Cheadle Heath
Cheadle
Stockport
Greater Manchester
SK3 0NE

1.4.2 The location is centred at National Grid Reference (NGR) SJ 86624 89723, as illustrated with a star in Figure 1 below.

Figure 1: Site Location



Reproduced from GoogleMaps™

1.5 Operating Hours

1.5.1 The FOG Treatment Facility will operate continuously with waste deliveries made during the following hours:

- 08:00 to 17:00 Monday to Friday
- 8:00 to 13:00 Saturday
- Sunday and bank holidays - closed

1.6 Environmental Setting

1.6.1 The facility is bordered by the River Mersey 100m to the north, with Mersey Vale Nature Park situated approximately 600 meters to the northwest. The surrounding land use is predominantly industrial and green space, with the Embankment Business Park located about 300 meters to the northwest.

1.6.2 Residential areas are in proximity to the site; the suburb of Cheadle Heath lies roughly 350 meters to the southeast. The Alexandra Hospital, a private healthcare facility, is located approximately 1.6 km to the southwest. There are open fields and a recreational ground 250m to the west and the M60 (Manchester outer ring road) 230m to the south.

Sensitive Receptors

1.6.3 Sensitive receptors have the potential to be impacted by emissions from the site and include both ecological and human receptors. Locations of nearby ecologically sensitive receptors were identified using Magic.gov data sources. The following types of sites, areas or zones were checked for their presence within 2km of the facility:

- Nitrate Vulnerable Zone (NVZ)
- Local Nature Reserve (LNR)
- National Nature Reserve (NNR)

- Ramsar Site
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)
- Area of Outstanding Natural Beauty (AONB)
- Environmentally Sensitive Area
- National Park

Receptor List

1.6.4 Table 1 below summarises the human and ecological receptors within 2000m of the site which have been considered in the context of this AMP.

Table 1: Sensitive Receptors

Receptor	Land Use	Direction from Site	Approximate Distance to Site Boundary (m)
Ecologically Designated Sites			
Mersey Vale Nature Park LNR	Ecological	North	134
Abney Hall LNR	Ecological	Southwest	485
Heaton Mersey Common LNR	Ecological	North	1170
Stenner Woods and Milgate Fields, Didsbury LNR	Ecological	West northwest	1804
Other Receptors			
Principal Bedrock Geology Aquifer	Hydrogeological	On site	-
Secondary A Superficial Deposits Aquifer	Hydrogeological	On site	-
Stockport STW	Commercial	North, East, South and West	0
The Embankment Business Park	Commercial	North	202
River Mersey	Hydrological and Ecological	North	112
Heathside Park Allotments	Agricultural	South	240
Agricultural Land	Agricultural	West	259
Residential properties off Selsey Avenue (nearest residential receptor)	Residential	South southeast	278
Playing Fields	Leisure	East southeast	419
Sports Grounds	Leisure	Northwest	437
Residential Properties off Walnut Tree Road	Residential	East southeast	499
Residential Properties off Craig Road	Residential	North northeast	550

Receptor	Land Use	Direction from Site	Approximate Distance to Site Boundary (m)
Didsbury Road Primary School	Educational	North	721
Cheadle Heath Primary School	Educational	Southeast	753
Mersey Vale Primary School	Educational	Northeast	949
Stella Maris School	Educational	North	988
Parrs Wood High School	Educational	Northwest	1009
St Johns Church of England Primary School	Educational	North northwest	1025
St Winifred's Roman Catholic School	Educational	North northeast	1033
Residential Properties off Morningside Drive	Residential	West northwest	1074
The Alexandra Hospital	Healthcare	Southwest	1079
Meadowbank Primary School	Educational	South	1216
Cheadle Primary School	Educational	Southwest	1299
Stockport Academy	Educational	East southeast	1363
Priestnall School	Educational	North	1430
The Barlow Roman Catholic High School	Educational	Northwest	1578
Larkhill Primary School	Educational	East	1624
Tithe Barn Primary School	Educational	North northeast	1778
Norris Bank Primary School	Educational	Northeast	1789
Ladybridge Primary School	Educational	South southeast	1856

1.7 Maintenance and Review of the AMP

1.7.1 The Plant Manager is responsible for the AMP and ensuring staff are suitability trained in the content of the AMP, in addition to other management plans and procedures.

1.7.2 A copy of this AMP will be held electronically and located at the Control Room; all members of staff will have access to this document.

1.7.3 The Site Manager will be responsible for dealing with any incidents or complaints.

1.7.4 The AMP will be reviewed annually, following an incident, or in the event of a change in operation which may impact potential accidents or emissions.

1.7.5 All relevant staff to be employed on site will be given training and instruction on implementing the AMP. Following any review of the AMP staff will be re-trained on the content of the AMP. Training will be part of the initial induction process and reviewed annually.

1.7.6 All third-party contractors will be required to be inducted; the induction process will include their responsibility concerning compliance with the Permit including the AMP, where relevant to their tasks.

1.8 Relevant Legislation and Guidance on which this AMP is Based

1.8.1 This AMP has been prepared with reference to the following key guidance:

- Environmental Permitting Regulations 2016, as amended.
- Biological waste treatment: appropriate measures for permitted facilities, Environment Agency, last updated 24 November 2024 referred to as 'Biological waste treatment AM guidance' throughout this report.
- Environment Agency, Control and monitor emissions from your environmental Permit, 24 November 2022.
- Environment Agency, Develop a management system: environmental Permits, 3 April 2023.
- Environment Agency, Risk assessments for your environmental permit, 3 January 2025.

2.0 Pollution Prevention Controls

2.1 Summary of FOG Treatment Processes

2.1.1 The FOG Treatment Facility treats incoming effluent to extract fats, oils and greases ('FOGs') for recovery into biodiesel at an off-site permitted Facility. It comprises:

- Vehicle offloading and connection points
- Buffer tank with solids screening
- Liquid waste storage and FOG treatment vessels
- Solids storage
- Wastewater discharge to UU STW via tanker
- A secondary treatment tank
- Water treatment chemicals (small quantities only)

Materials Handling and Storage

2.1.2 Materials stored and used at the site are presented in Table 2 below. Material Safety Data Sheets (MSDSs) are included in Appendix D.

Table 2: Storage of Potentially Polluting Materials

Vessel	Purpose and Contents	Materials of construction	Size	Secondary Containment	Other Pollution Controls	Surfacing
Buffer tank (Module 1)	Screen incoming FOG-containing liquor	314 stainless steel	6m^3	Bunded to 110% capacity within container	Electronic level sensors and spill switches will automatically stop any offload in process and alert site operatives.	Concrete hard standing
Skimming Tank (Module 2)	Mechanical treatment of FOG liquor to increase FOG content to 70%.	314 stainless steel	27m^3	Bunded to 110% capacity within container	Electronic level sensors and spill switches will automatically stop any offload in process and alert site operatives.	Concrete hard standing
Separation container (Module 3)	Heat treatment of FOG liquor to produce finished product.	314 stainless steel	2No. 0.71m^3	Bunded to 110% capacity within container	Electronic level sensors and spill switches will automatically stop any offload in process and alert site operatives.	Concrete hard standing
ISO Storage Tank - Brown Grease (Module 4)	Storage of finished product.	314 stainless steel	20m^3	Located within an area provisioned with a remote bund.	Electronic level sensors and spill switches will automatically stop any offload in process and alert site operatives.	Concrete hard standing
Solid waste storage tank	Storage of organic waste, before removal (from the initial screening stage).	Enclosed steel skip or similar	0.5-1.5m^3	Located within an area provisioned with a remote bund.	Enclosed chute extracts waste into a covered skip. Daily visual check. Authorised waste contractor changes containers on request.	Concrete hard standing
Settlement tank (Module 2b)	To aid further settling of solids	Mild steel	24m^3	Bunded to 110% capacity	Electronic level sensors and spill switches will automatically stop any offload in process and alert site operatives.	Concrete hard standing
Effluent Treatment Chemicals	To aid further settling of solids	Proprietary containers	<25L	Stored in bunded containers.	Daily visual check.	Concrete hard standing

2.2 Accident and Pollution Prevention Controls

2.2.1 The FOG Treatment Facility includes a comprehensive set of pollution prevention controls, with a strong focus on spill prevention. These controls are integrated into the design, operation, and management systems of the site. A Pollution Prevention and Incident Response Protocol is in place to instruct staff on what to do in the event of an incident, see Appendix C.

2.2.2 The key pollution prevention controls in place are described below.

Spill Prevention Measures

2.2.3 As potentially polluting liquids are stored on-site, spills have been identified as the main risk to the environment. Spill prevention is therefore critical to avoiding contamination of land, groundwater, and surface water, especially considering the site's proximity to sensitive receptors including aquifers and the River Mersey.

- Drainage plan will be in place and is integrated in site procedures and the EMS.
- All tanks and vessels are bunded to at least 110% of their capacity.
- Tanker offloading areas are located on sealed concrete slabs and include curbed drip collection and spill containment.
- Tanks and vessels are equipped with electronic level sensors and spill switches to prevent overfilling and initiate alerts.
- Treatment chemicals are stored in small proprietary containers inside bunded containerised plant rooms with impermeable surfaces.
- Operational areas have impermeable surfaces with sealed construction joints to prevent leaks from percolating into the ground.
- Spill kits are available at strategic locations on-site, and staff are trained in their proper use. Spill procedures in place (see Pollution Prevention and Incident Response Protocol in Appendix C).
- Routine inspections and preventive maintenance (PPM) programs are implemented to ensure ongoing equipment integrity.
- All deliveries are supervised by trained staff to reduce the risk of accidental releases during coupling/decoupling.
- Emergency shutdown procedures are in place and can be initiated remotely via SCADA control systems in case of abnormal conditions.
- Daily visual checks are conducted to identify early signs of issues and ensure rapid response.

Odour Control

- Treatment processes are enclosed within containerised units to minimise odour release.
- All tanks and vessels used for waste storage and treatment are sealed.

- Tanker offloading is performed in enclosed areas and under supervision.
- Solid waste is stored in enclosed skips accessed via a sealed chute.
- Daily odour sniff tests are conducted and logged as part of routine monitoring.
- An Odour Management Plan (OMP) is implemented and regularly reviewed.

Noise Control

- Treatment equipment is housed within acoustic enclosures (ISO containers).
- Operations are limited to daytime hours.
- Preventive maintenance routines help ensure equipment operates smoothly, avoiding abnormal noise.
- Noise complaints are investigated under a formal procedure with records maintained.

Fugitive Emissions Control

- Enclosed process vessels and pipelines minimise potential emissions to air or ground.
- Impermeable site surfacing and bunded storage mitigate leaks and run-off risks.
- The site is not within a Source Protection Zone and has low potential for groundwater pollution due to robust containment.
- Treatment chemicals are used in minimal quantities and stored securely in bunded plant rooms.
- SCADA systems continuously monitor processes and trigger automatic shutdowns in abnormal conditions.

General Accident Prevention Measures

- A Pollution Prevention and Incident Response Protocol is in place to instruct staff on what to do in the event of an incident, see Appendix C.
- Staff training in place and the site employs a Technically Competent Manager.
- Fire risk is unlikely to occur as a result of the wastes stored on-site as they are all aqueous.
- Staff receive emergency response and safety training including simulation drills.
- The facility is equipped with CCTV, perimeter fencing, and controlled access gates.
- All tanks are protected from vehicle impacts. Speed limits are in force on-site and all vehicle deliveries and collections are supervised.
- The site is in a Flood Zone 1 and subscribed to the EA Flood Warning System.
- Emergency shutdown procedures are documented and practiced regularly.

2.3 Accident Risk Assessment Summary

2.3.1 Table 3 below summarises the potential accident risks identified in the Environmental Risk Assessment and summarises mitigation measures in place to prevent accidents and limit their consequences.

Table 3: Detailed Risk and Control Measures Table

Hazard	Source	Normal/Abnormal	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management Summary	Residual Risk
Loss of Noise Containment	Pumps (failure)	Abnormal	Airborne noise	Residents, businesses	Low	Low	Low	Containerised buildings, PPM, complaint procedure	Very Low
Vehicle impact on tanks	Vessels	Abnormal	Ground runoff	Public, amenity users habitats	Low	Medium	Medium	Security fencing, bollards, traffic rules, inductions	Low
Arson/vandalism	Unauthorised access	Abnormal	Air, water, land	Public, habitats	Low	High	High	Security systems, alarms, fire procedures, access control	Low
Fire/explosion	Plant/equipment	Abnormal	Air, runoff	Public, site users	Low	High	High	Fire training, equipment maintenance, emergency planning	Low
Plant failure	Equipment	Abnormal	Air, land	Public, habitats	Low	Medium	Medium	SCADA, PPM, shutdown protocols, trained staff	Low
Flooding	Stored materials	Abnormal	Floodwater	Public, habitats	Low	Medium	Medium	Not in flood zone, EA alerts, shutdown plans	Low

Hazard	Source	Normal/Abnormal	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management Summary	Residual Risk
								Climate Change Risk Assessment (CCRA) identifies mitigation measures	
Extreme weather	Equipment	Abnormal	Air, runoff	Public, habitats	Low	Medium	Medium	Insulation, heating, emergency drills, CCRA identifies mitigation measures	Low
Contaminated runoff	Stored materials	Abnormal	Ground/surface water	Habitats	Medium	Medium	Medium	Bunds, impermeable surfacing, inspections, training	Low
Effluent release	FOG processes	Normal	UU STW	Receiving waters	Low	Low	Low	Pre-treatment reduces pollutant content, SCADA, routine checks	Low
Spill from vessels	Process tanks	Abnormal	Ground/surface water	Habitats	Medium	Medium	Medium	Bunds, impermeable surfacing, spill kits, training	Low
Chemical spill	Water treatment drums	Abnormal	Ground/surface water	Habitats	Low	Low	Low	Small volumes,	Very Low

Hazard	Source	Normal/Abnormal	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management Summary	Residual Risk
								bunded storage, sealed joints, spill kits	
Odour due to leak	Tanks/vessels	Abnormal	Air	Residents, businesses	Low	Medium	Medium	Enclosed tanks, OMP, odour checks, SCADA	Low
Odour from tanker leak	Offloading area	Abnormal	Air	Residents, businesses	Low	Medium	Medium	Enclosed offload, OMP, supervision, drip trays	Low
Odour from treatment containerised building	Treatment tanks within containerised building	Abnormal	Air	Residents, businesses	Low	Medium	Medium	No vents, enclosed plant, OMP	Low
Odour from solid waste skip	Solid waste storage	Normal	Air	Residents, businesses	Low	Medium	Medium	Enclosed skip, OMP, odour sniff testing	Low

2.4 Monitoring and Maintenance

2.4.1 The Operator maintains critical plant and equipment and there are service contracts or other similar provisions in place where tasks cannot be carried out by site staff.

2.4.2 The new plant and equipment will employ computerised controls. If a fault is detected an automated email is sent to the site operator and the Eco Clarity management team. The system can be monitored remotely and if necessary, can be shut down remotely.

2.4.3 Plant and equipment will be subject to regular inspections to check integrity. All new plant and equipment will be maintained as per equipment manufacturer's instructions. Provision of spare parts is maintained on-site for known perishable items.

2.4.4 If an incident occurs due to on-site operations, an investigation will be conducted to determine the root cause of the problem and an action plan will be initiated to address and mitigate any issues identified.

2.5 Abnormal and Emergency Operations

2.5.1 As well as the abnormal operation scenarios identified in Table 3 above, the following occurrences related to external factors may also result in abnormal operation or exacerbate normal operating conditions potentially resulting in releases of emissions from the site. The sections below describe how each external factor is managed on site and how it can potentially impact emissions.

Abnormal Meteorological Conditions

2.5.2 Abnormal meteorological conditions can cause disruption to operation in the following ways, for example:

- Localised flooding can cause damage to plant and equipment and prevent access to the site.
- Hot weather can damage plant and equipment and exacerbate odours.
- Cold weather can freeze the contents of pipework and cause damage to plant and equipment.
- Heavy snow fall can cause damage to plant and equipment (such as through snow loading on buildings) and prevent access to the site.

2.5.3 In extreme circumstances, damage may result in odorous releases, for example if the damage was caused to FOG tanks and pipework.

2.5.4 The Site Manager and staff operatives undertake weather checks to ensure that any abnormal weather conditions can be foreseen as much as possible and contingency arrangements can be put in place prior to any problem occurring on site. If the site must be closed due to severe weather conditions deliveries are diverted to an alternative suitably authorised site for either recovery or disposal.

Breakdown of Process Equipment and Plant

2.5.5 The new plant and equipment will employ computerised controls. If a fault is detected an automated email is sent to the site operator and the Eco Clarity management team. The system can be monitored remotely and if necessary, can be shut down remotely.

2.5.6 Plant and equipment will be subject to regular inspections to check integrity. All new plant and equipment will be maintained as per equipment manufacturer's instructions. Provision of spare parts is maintained on-site for known perishable items.

Staffing Issues

2.5.7 If there is insufficient staff, for example through illness, it could result in an increased potential for an incident to occur. The scenarios identified in Table 3 above could all be impacted from inappropriate staffing (e.g. individual staff members have not received training or instruction), or inadequate staffing.

2.5.8 The facility has in place a standby staff rota which is actively managed. Equally, during staff holidays the standby rota is updated to ensure there is always adequate cover.

2.5.9 All staff listed on the standby rota are provided with a list of emergency contact names and numbers. Staff are provided with training relevant to their role, whether they are full time or standby members of the operational team.

3.0 Reporting and Record Keeping

3.1 Complaints Reporting

3.1.1 Complaints received at the facility investigated by the Operator without delay to identify the root cause in accordance with the Complaints Procedure in Appendix A. Complaints are responded to as soon as possible, typically during the same day that the complaint was recorded. Verified problems will be reported to the Environment Agency within 24 hours.

3.1.2 The Operator will undertake a formal review of on-site processes following any major incident and will routinely review any complaints received as and when they occur.

3.2 Community Engagement

3.2.1 It is vital to record and act upon complaints received and communicate the outcome of the investigation to the complainant. It is equally vital to undertake a review following complaints or incidents if warranted to implement further control measures or change behavioural practices on-site to prevent the event from occurring again.

3.2.2 Members of the public can contact Eco-Clarity Wastewater Services with any complaints in relation to the plant by the following means:

- Email;
- Phone; and
- Website.

3.2.3 The Complaints Procedure is included in Appendix A. All records of events and actions taken will be retained as required by the Permit.

3.3 Notifying the Environment Agency

3.3.1 If an accident or incident occurs the Operator will notify the Environment Agency as soon as practically possible, using the emergency 24hr phone line (0800 80 70 60). The Site Manager, TCM or duty Shift Manager for the facility will also notify the Regulatory Officer should any complaints be received directly to site and advise what remedial measures or actions have been taken to address the problem. Copies of any substantive complaints received will be made available to the Environment Agency for review.

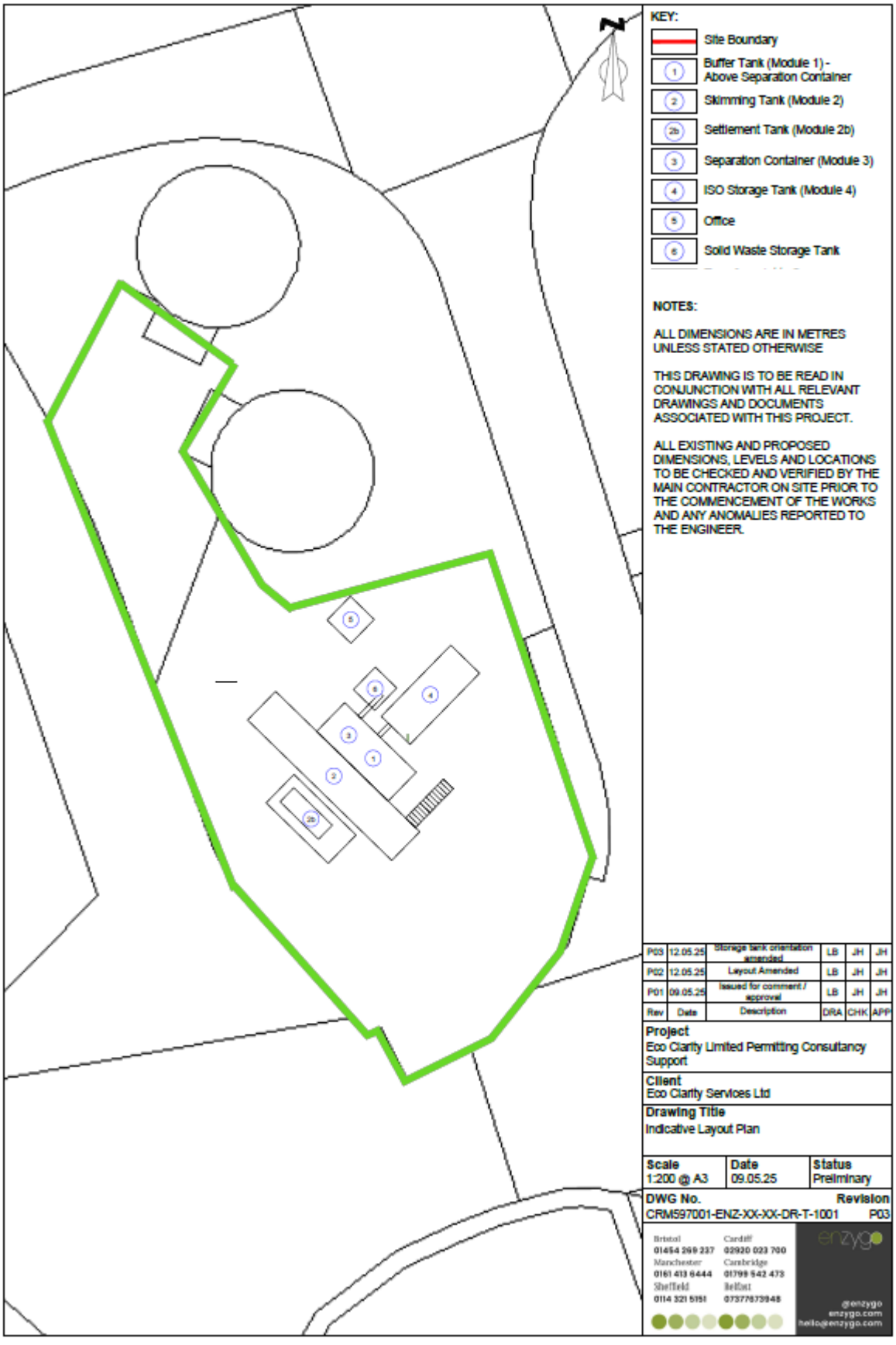
3.3.2 The EA will also be notified in accordance with Environmental Permit conditions using the Notification form provided in the Permit Schedules.

3.4 Record Keeping

3.4.1 The Operator will maintain up-to-date records of all accidents, incidents, near misses, and maintenance inspections to ensure thorough monitoring and accountability. Any incidents that occur are promptly investigated to determine their root causes, with appropriate measures implemented to prevent recurrence.

3.4.2 All records of events and actions taken are retained as required by the Permit for a period of six years.

Drawings


KEY:
Site Boundary
1 Buffer Tank (Module 1) - Above Separation Container
2 Skimming Tank (Module 2)
2b Settlement Tank (Module 2b)
3 Separation Container (Module 3)
4 ISO Storage Tank (Module 4)
5 Office
6 Solid Waste Storage Tank
NOTES:
ALL DIMENSIONS ARE IN METRES UNLESS STATED OTHERWISE
THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT DRAWINGS AND DOCUMENTS ASSOCIATED WITH THIS PROJECT.
ALL EXISTING AND PROPOSED DIMENSIONS, LEVELS AND LOCATIONS TO BE CHECKED AND VERIFIED BY THE MAIN CONTRACTOR ON SITE PRIOR TO THE COMMENCEMENT OF THE WORKS AND ANY ANOMALIES REPORTED TO THE ENGINEER.
P03 12.05.25 Storage tank orientation amended LB JH JH
P02 12.05.25 Layout Amended LB JH JH
P01 09.05.25 Issued for comment / approval LB JH JH
Rev Date Description DRA CHK APP
Project
Eco Clarity Limited Permitting Consultancy Support
Client
Eco Clarity Services Ltd
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Indicative Layout Plan
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Appendix A –Complaints Procedure

Eco Clarity Wastewater Services UK Limited	Complaints Procedure	Page	Page **1** of **1**
		Version	1
		Effective Date	

1. Purpose

The purpose of this procedure is to provide details and define actions that employees are required to follow to ensure that best practice is employed on site, and that any complaints are appropriately managed.

2. Scope

This procedure applies to complaints arising from activities at the Facility.

3. General

All complaints received at the site must be notified to the Plant Manager / designated TCM for the site who is responsible for notifying the Environment Agency.

4. Procedure

1. Any complaint received will be reported to the Plant Manager.
2. If a complaint is received, the complaint report form will be completed, a copy will be kept in the site office and will be made available for inspection by the Environment Agency.
3. If details have been provided, the SHE team will contact the complainant by telephone to discuss the nature of their complaint.
4. After details of the complaint have been compiled, the cause(s) will be investigated, with reference to:
    - The activities taking place on site at the time;
    - The timing of the complaint (whether weekday, weekend, daytime, evening) etc;
    - The weather conditions at the time (if relevant to the source of the complaint).
5. The likely reasons for the complaint will be added to the form and the complainant will be contacted as appropriate.
6. The EMS and any relevant management plans will be reviewed and updated if required.
7. Details of actions taken.
8. Complete forms are kept on site in the document management system.

Appendix B – Complaint Form

Complaint Form		
Installation to which Complaint relates	**Date recorded**	**Reference number**
Name and address of caller (complainant)		
Telephone Numbers		
Date, time and duration of emission		
Incident description		
Any other comments from complainant		
Weather conditions (if relevant to complaint)		
Wind Direction and Strength (if relevant to complaint)		
Any other previous complaints relating to this complaint	**Yes / No**	
Any other relevant information		
Potential emission sources or plant operations that could give rise to the complaint		
Operating conditions at the time event occurred		
Follow-Up		
Date and time caller contacted		
Action taken		
Amendment required to the EMS or management plans?	**Yes / No**	
Form completed by:	**Signed:**	

Appendix C – Pollution Prevention and Incident Response Protocol

1. Overview This protocol outlines the steps and measures Eco-Clarity will implement to prevent pollution risks associated with the effluent storage system and ensure a swift response to any incidents. The aim is to protect the environment and comply with the Environment Agency's (EA) standards and guidelines.

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2. Pollution Prevention Measures

Tank Supervision:

- All offloading of effluent from incoming deliveries to the storage tank will be supervised by trained Eco-Clarity staff to ensure adherence to operational protocols.
- The emptying of the storage tank into licensed tanker vehicles will be continuously supervised to prevent overfilling, spills, or other operational issues.

Valve Control:

- Valves controlling the flow of effluent from our operational processes to the storage tank can be manually closed during emergencies or maintenance activities, ensuring no further discharge occurs.

Rainwater Management:

- The secondary containment bund will be inspected daily, and accumulated rainwater will be removed regularly. Proper disposal methods will be followed to ensure compliance with environmental guidelines.

Equipment Maintenance:

- Regular inspections and maintenance will be conducted on the storage tank, bund, and associated piping systems to prevent leaks, wear, or damage.
- A fixed pipe within the inner tank, securely mounted on a stand, will ensure controlled and efficient transfer of effluent to the tanker vehicle.

Spill Kits and Prevention Tools:

- Drip trays will be utilized during all tanker connection operations to capture any minor leaks.
- Spill kits will be stationed near the effluent storage area, containing absorbents, protective gear, and other essential tools for rapid spill containment.

Staff Training:

- Staff involved in effluent management will undergo regular training on pollution prevention measures, equipment handling, and emergency response procedures.

Monitoring and Inspection

- Effluent monitoring will be conducted by trained personnel using established site-based test methods.

- A daily walkover is carried out to check for spills, defects and abnormal noise or odour. Any findings are recorded in the Site Diary.

Record Keeping

The following information is recorded:

- Incidents and accidents
- Monitoring records
- Inspection records
- Communication with United Utilities and the Environment Agency
- Waste deliveries to and from the site
- Any records related to permit conditions
- EMS reviews

Any records required to be maintained by the Permit will be held for a period of six years.

Review

The EMS and associated documentation is reviewed annually by the Site Manager or following an incident or complaints with a record made of any changes.

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3. Incident Response Procedures

Step 1: Immediate Containment

- In the event of a spill or leak, Eco-Clarity staff will immediately use spill kits to contain the effluent and prevent its spread into the environment or adjacent areas.
- If the spill occurs within the bund, ensure the integrity of the bund remains intact and does not overflow.

Step 2: Cease Operations

- Close all valves leading to the storage tank to stop the discharge of additional effluent into the affected system.
- Halt all tanker loading or offloading activities until the situation is under control.

Step 3: Notification

- Notify the Environment Agency immediately to report the incident and provide details about the type and volume of effluent involved, as well as the containment measures taken.
- Inform the licensed waste carrier if the incident involves their equipment or operations.

Step 4: Clean-Up and Recovery

- Use the spill kits and additional resources to clean up the spill thoroughly. Contaminated materials will be collected and disposed of by a licensed waste contractor.
- Inspect the tank, bund, and associated systems for damage and perform necessary repairs to prevent recurrence.

Step 5: Documentation and Follow-Up

- Record the incident details, including the cause, response actions, and outcomes, in the site's environmental management records.
- Review and revise operational procedures as necessary to address any identified weaknesses.

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4. Contact Information

Emergency Contacts:

- **Environment Agency Incident Hotline:** 0800 80 70 60
- **Eco-Clarity Site Manager:** Bogdan Bujor - 07824776763

This protocol will be reviewed regularly or following any incidents to ensure its effectiveness and alignment with regulatory requirements. By adhering to these measures, Eco-Clarity demonstrates its commitment to proactive pollution prevention and environmental stewardship.

Appendix D - Material Safety Data Sheets

Brown Grease

Water Treatment Chemicals

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