

## Environmental protection

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# 1 Introduction

- 1.1 This policy provides guidance to Incident Commanders (IC) on:
- (a) The agencies responsible for environmental protection.
  - (b) The agencies legislation and powers, and how it affects the London Fire Brigade (LFB).
  - (c) The requirements of ICs.
  - (d) When the EA need to be notified of an incident.
  - (e) What equipment is available for pollution control.
  - (f) Sources of specialist knowledge.
- 1.2 It is the LFB's policy to 'take all reasonable steps within its powers to preserve and protect the environment'.
- 1.3 The LFB's actions in relation to pollution of the water environment are to be in accordance with the protocol between the Local Government Association (LGA) and the EA on Fire Service issues and agreed local working arrangements. Actions in relation to pollution of air and land will be in accordance with statutory legislation, local government initiatives (e.g. the London mayoral strategies) and best practice.

## Legislation

- 1.4 It is emphasised that any area with people is a sensitive environment. However, there are other areas or features that are particularly sensitive to pollution and may need additional consideration before a plan is implemented. The following list is not exhaustive or in any particular order:
- Drinking water abstraction (intakes) points.
  - Zones where the EA have determined that the groundwater is vulnerable to pollution.
  - Special protection areas for birds (SPA).
  - Special areas of conservation (SAC).
  - Sites of special scientific interest (SSSI).
  - These designations are to form part of the European network of outstanding wildlife sites. If an incident involves one of these sites, a message should be sent to Brigade Control to inform the EA.
  - Off site emergency plans prepared by emergency planning under the Control of Major Accident Hazards (COMAH) regulations 2015 specify environmental sensitive sites.

# 2 Hazards

## Life risk

- 2.1 Preventing fatalities, injuries and adverse health effects to people will always override environmental considerations. Under no circumstances should life be put at risk at the expense of protecting the environment.

## Sources of pollution

- 2.2 A **pollutant** can be any material, natural or man-made, introduced into the environment that has undesired effects, or adversely affects the usefulness of a resource. Pollutants can however be classified into three groups:

- Eco toxic materials. Hazardous materials including acids, solvents, oils, dyes, poisons, detergents, disinfectants, etc.
- Organic materials, milk, beer, orange juice, blood, cooking oil, firefighting foam etc.
- Inorganic solids, cement, silt, plaster, sand, chalk, etc.

There are a range of hazards from what we commonly perceive as hazardous materials and these are covered in Policy number 796 - HAZMATS; fires and incidents involving hazardous substances.

### 2.3 Pollution can arise from:

#### (a) Air pollution:

- (i) Gaseous and airborne products from fires.
- (ii) Products from fires involving materials categorised as hazardous e.g. fires involving hazmats.
- (iii) Materials released at special services.
- (iv) Releases of gas or vapour from premises, plant or transport.
- (v) Evaporation from liquid spillages.
- (vi) Deliberate release of gas or vapour.
- (vii) Releases or liberation of particulates or fibres e.g. asbestos or manmade mineral fibres (MMMMF).
- (viii) Exhaust emissions from vehicles and equipment.

#### (b) Land and water pollution:

- (i) Liquid spillages at special services involving materials categorised as hazardous.
- (ii) Spillages of liquids not categorised as hazardous but nevertheless polluting e.g. milk, beer, orange juice, etc.
- (iii) Contaminated firefighting water runoff.
- (iv) Firefighting foam.
- (v) Decontamination run off.

2.4 The EA have a published list of notification criteria, see Appendix 1. These threshold quantities are provided as an illustration. In the event of a spillage of any of these substances the EA must always be contacted. In environmentally sensitive areas, especially during 'low water flow' conditions, notification to the EA may be required below these thresholds.

2.5 It is often difficult to decide what quantities of polluting products are likely to result in damage to the environment. As a general rule, ICs should inform the EA when 'above normal domestic quantities' of products are involved in incidents or enter drainage systems. Ideally, notification that a pollutant or polluting activity is about to impact the environment should take place as early as possible. The following are examples of situations when notification should be initiated by the IC.

### 2.6 Seek agreement with the Environment Agency or water/sewerage undertaker before:

- Polluting materials are likely to, or have entered drains or a watercourse.
- Decontamination of personnel is about to take place.
- Before or when firefighting foam is deployed, excluding small vehicle fires.

- Incidents are on or adjacent to watercourses.
- Stacked waste material such as tyres, fridges, etc. are involved in a fire.
- Before decontamination of operational equipment, unless in previously agreed areas.

This is not a definitive list and at times there may be incidents that do not fall into any precise category and if any doubt exists the EA should always be contacted.

- 2.7 The EA supplied equipment is not intended for the control of uncontaminated flood water e.g. from a burst main, however, it is recognised that the equipment may be ideally suited to controlling the water if pollution could arise as a result of it e.g. compromising a sewage treatment works, or compromising a SSSI habitat.
- 2.8 For Incidents involving the tidal River Thames, The Port of London Authority must be notified, via Brigade control.
- 2.9 It may be that LFB personnel attend incidents where an offence may have been or is being committed. In such cases the respective regulatory authority may want to investigate the incident. The IC may be asked to give evidence, therefore they should consider making notes that may assist with the recollection of facts. The following examples may be offences.

<b>Offence</b>	<b>Regulatory authority</b>
Burning of trade waste.	Environment Agency.
The emission of black/dark smoke from trade premises.	Local Authority.
The emission of smoke so as to cause a health hazard or nuisance.	Local Authority.

### **3 Pre-planning**

#### **The Environment Agency (EA)**

- 3.1 The EA is responsible for:
- (a) Advising on and regulating the management of any waste arising at an incident, but not for its disposal.
  - (b) Main drainage and pollution control relating to sewers. This function is exercised in conjunction with the appropriate London Borough/City Corporation / water and sewerage utilities.
  - (c) Pollution control over the River Thames and all its tributaries, watercourses and all other open water sites in the Greater London area.
  - (d) Flood control within the Greater London area, including the operation of flood barriers on the River Thames and adjacent tidal creeks.
- 3.2 The enforcing regulations are found in The environmental permitting (England and Wales) regulations 2016. In Section 40, within the regulations there is a defence that applies to the LFB, as long as all three parts are met.
- (a) It is a defence for a person charged with an offence under regulation 38(1), (2) or (3) to prove that the acts alleged to constitute the contravention were done in an emergency in order to avoid danger to human health in a case where:

- (b) The person took all such steps as were reasonably practicable in the circumstances for minimising pollution; and
- (c) Particulars of the acts were furnished to the regulator as soon as reasonably practicable after they were done.

Once environmental damage has occurred, the regulations introduce procedures for the establishment of appropriate remedial measures.

3.3 The damage must be in an area as specified thus:

- (a) Damage to water: All water up to one nautical mile seaward from the baseline in England.
- (b) Damage in a site of special scientific interest: Damage to protected species or natural habitats: The seabed of the continental shelf, anywhere other than the seabed in the renewable energy zone.
- (c) Damage to land.

### **Natural England**

3.4 Whilst the enforcing agency for environmental damage lies with the EA, the nature conservation body is Natural England Section 28 of the Wildlife and Countryside Act 1981 as replaced by Schedule 9 to the Countryside and Rights of Way Act 2000 and inserted by the Natural Environment and Rural Communities Act 2006 ('the Wildlife and Countryside Act') gives Natural England the power to make sure SSSIs are protected and managed effectively. They are responsible for enforcing this section of the law and can take appropriate enforcement action when the law is broken and when the habitat and features of SSSIs are damaged, disturbed or destroyed. This applies to any LFB activity.

3.5 Types of offence include:

- (a) Carrying out, causing or allowing operations likely to damage an SSSI without consent.
- (b) Carrying out or authorising operations likely to damage an SSSI without meeting the requirements to notify us.
- (c) Failing to minimise any damage to an SSSI and if there is any damage, failing to restore it to its former state so far as is reasonably practical and possible.
- (d) Intentionally or recklessly damaging, destroying or disturbing any of the habitats or features of an SSSI.

### **Other legislation**

3.6 The Environmental Damage (Prevention and Remediation) (England) Regulations 2015 implement Directive 2004/35/EC on environmental liability (ELD) of the European Parliament and of the Council on environmental liability with regard to the prevention and remedying of environmental damage.

- (a) The Regulations apply to serious environmental damage to land, water and to species and habitats.
- (b) They cover not only species and habitats protected by the Birds and Habitats Directives but also any other species and habitats protected on Sites of Special Scientific Interest (SSSIs). Of the activities listed in Schedule 2, those that the LFB may be directly attributable for include:
  - (i) Any discharge into surface or ground water requiring a prior permit.

- (ii) Water abstractions that require a prior permit.
- (iii) Release of dangerous substances into the environment.
- (iv) will be liable for damage caused whether or not they are at fault; or
- (v) Any other activity responsible for species and habitat damage that is the fault of the LFB, (that is, they intended to cause damage or were negligent).

There is no defence for these regulations

### **Water resources**

- 3.7 For England and Wales, the principal water pollution offences are contained in the Environmental Permitting (England and Wales) Regulations 2016.
- 3.8 It is an offence to cause or knowingly permit a water discharge activity unless you are complying with an environmental permit or exemption. They include:
  - (a) Discharging poisonous, noxious or polluting matter or solid waste matter into inland freshwater, coastal waters and relevant territorial waters.
  - (b) Discharges of pollutants, either directly or indirectly, into groundwater
- 3.9 Within this legislation there is a clear defence for the LFB.
  - (a) It is a defense to a water pollution offence if the activity was done in an emergency in order to avoid danger to human health, provided that reasonable steps were taken to minimize pollution and notify the regulator promptly.

### **Air pollution**

- 3.10 The Secretary of State for Environment, Food and Rural Affairs has responsibility for meeting the limit values in England and the Department for Environment, Food and Rural Affairs (Defra) co-ordinates assessment and air quality plans for the UK as a whole.
- 3.11 Legislation in this area covers vehicles and premises using the Clean Air Act 1993 as amended, Road Vehicles (Construction and Use) Regulations 1986 as amended, and for industrial premises the Pollution Prevention and Control Act 1999 as amended and are therefore easy to control and regulate. The LFB is only bound by these regulations in creating air pollution.
- 3.12 The only instance whereby the LFB could be perceived to be deliberately creating air pollution and therefore not complying with the regulations is in the case of a controlled burn, see PN 859 – Controlled burn. However, controlled burn is an agreed tactic with the EA to reduce water and air pollution.
- 3.13 In England and Wales, the Fire and Rescue Service Act 2004 (Reference 9) places no legal duty on Fire and Rescue Authorities to extinguish fires. Their duty is only to provide for extinguishing fires and protecting life and property in the event of a fire. The decision on how to conduct firefighting operations is governed by the principles of common law relating to reasonableness. In practice, this means there are likely to be circumstances such as the protection of public water supplies, where it would be reasonable for the Fire and Rescue Service Incident Commander to decide to cease - or limit - firefighting operations because the consequences of continuing would be worse than the destruction of property.

## Equipment

- 3.14 The Environment Agency (EA) has supplied Fire Rescue Services (FRS) with pollution control equipment in the form of grab packs carried on pumping appliances, and the large scale spill kit carried on the Operational Support Unit (OSU).
- 3.15 Grab packs
- (a) The grab packs are specifically designed as an emergency first aid measure for environmental protection. The absorbent pads and booms they contain are ideally suited to oil based pollutants including petrol and diesel, they are ineffective when used for aqueous materials. Aqueous materials will require the use of the large spill kit, see 3.16. Prompt action following a spillage can prevent or reduce any polluting effects, whilst inappropriate action may cause or worsen them. The response in the first 30 minutes to such spillages is therefore crucial. ICs will need to undertake a RA in order to decide the most appropriate course of action and follow the advice on the pollution control aide-memoire (Appendix 1) contained within the grab pack. If necessary further advice can be sought from the SA/ HMEPO and EA. Crew safety must remain the overriding consideration and is always to be given priority over environmental protection if there is a conflict of interest. All environmental protection activities should be carried out in the appropriate PPE for the nature of the incident, and incorporate safe systems of work.
  - (b) Incident commanders must consider the use of the grab pack to prevent these pollutants entering watercourses by either blocking drains or containing the spillages at source. However for flammable fuel spillages the use of sand must remain the preferred method. Best practice dictates that a clear channel should be left for rain water to enter the drains without first mixing with the absorbent material.
  - (c) Each station is required to have one grab pack per pumping appliance and a reserve stock. Details of the grab pack inventory can be found in Policy number 908 - Environment Agency grab pack and large spill kit - technical information.
- 3.16 Large spill kit
- (a) The large spill kit is designed to be used at major pollution events, hazmat incidents or situations where polluting materials from firefighting run off need to be contained. It contains all of the items found in grab pack, but in greater quantities, and equipment suitable for absorbing aqueous materials. It also contains longer and larger containment booms, a pump suitable for hazardous materials, and items to enable spillages to be contained.
  - (b) Each OSU station is required to have one complete large spill kit and a reserve stock. Details of the large scale spill kit inventory can be found in Policy number 908 - Environment Agency grab pack and large spill kit - technical information.
- 3.17 The items in the grab pack and large spill kit are supplied to the LFB free of charge for use at operational incidents to control pollution. For spillages at LFB premises, the premises spill kit is to be used see Policy number 747 - polluting material storage and spillage procedure.
- 3.18 The EA do not provide equipment for training purposes. For training, damaged items or those no longer fit for operational service should be used.
- 3.19 It is a mandatory requirement of the EA that their Pollution notification form is completed for all orders of replacement equipment. The EA recover the cost of the items used from the polluter using the 'polluter pays principle', this enables them to continue funding the equipment.

## **Sites of Special Scientific Interest (SSSI)**

- 3.20 In London there are currently 37 recognized sites and one new notification. Full details of all sites can be found on the Natural England web site. Abridged versions of each site together with a map detailing its location can be found on SharePoint. The sites have also been uploaded onto appliance MDT systems and are accessible as a layer from the map view.
- 3.21 Stations should review and visit the SSSIs on their ground where possible arranging joint 7 2 (d) visits with the Environment Agency, noting:
- (a) Access points.
  - (b) High risk premises that border the site.
  - (c) The protected species or feature/geology present.

## **4 En-route**

- 4.1 Where available, operational contingency plans can be found in the operational risk database of the MDT.
- 4.2 Crews are to consider:
- (a) Prevailing weather conditions.
  - (b) SSSIs.
  - (c) Water courses.
  - (d) Approach direction.

## **5 Operational considerations**

- 5.1 Before decisions can be made the IC will have to assess the hazards. In most cases extinguishing the fire or controlling a release will prevent or control pollution. Where it is not that simple, the issues below will need to be considered.
- (a) Wind speed and direction: The assessment of toxic hazards from airborne materials, and airborne dispersion can be obtained from the hazardous materials and environmental protection officer (HMEPO) and the scientific adviser (SA).
  - (b) Are substances involved, lighter or heavier than air, soluble, toxic, flammable?
  - (c) On site specialist advice.
  - (d) Methods to reduce 'gassing off'.
  - (e) Sealing leaks.
  - (f) Absorption with inert materials.
  - (g) Blanketing with foam.
  - (h) Cooling overheating containment systems.
  - (i) 'Washing' or containing/directing the gas/vapour cloud with water sprays and water curtains.
  - (j) Advice from the environmental health officer.
  - (k) The nature and severity of the pollution that the activities of the LFB will create, e.g. the use of water and foam to resolve an incident.

- 5.2 When pollution control activities are taking place, personnel must not be placed at undue risk nor must operational safety be compromised. ICs should apply standing instructions together with a risk assessment (RA) regarding issues such as personal protective equipment (PPE), working on or near water, infection control, hazardous materials and working in confined spaces.
- 5.3 At fires there will be both airborne and land based pollutants, firefighting water run-off may become contaminated by the products used or stored at the premises. For certain materials e.g. pesticides, the risk to the water environment might be considered so great, that allowing a 'controlled burn' (see Policy number 859 - controlled burn) is deemed the best practicable environmental option.
- 5.4 Dispersal in the atmosphere is likely to be more easily effected than dispersal in the water or land environment. In such an eventuality full consultation with all interested parties would be advisable. When taking the 'controlled burn' option, ICs are advised to record advice given by specialists and interested parties.
- 5.5 Interested parties may include:
- Site owners, operators and their insurers.
  - Local Authority Environmental Health Officers and Emergency Planning Officers.
  - Health and Safety Executive.
  - Environment Agency.
  - Sewerage undertakers.
  - Department of the Environment, Food and Rural affairs (DEFRA).
- 5.6 For spillages on land or water use the hierarchy of pollution control.
- (a) Stage 1 – contain at source.
- (i) Seal a damaged container. Stem the flow from a damaged container, contain at source by use of an over drum, close valves.
- (b) Stage 2 – contain close to source.
- (i) Use absorbent pads, booms.
- (c) Stage 3 – containment on the surface.
- (i) Use of poly boom, drain mats. Containment dam.
- (d) Stage 4 – contain in the drainage system.
- (i) Oil separators, penstocks, pollution control valves, pipe blockers.
- (e) Stage 5 – contain in or on the watercourse.
- (i) Oil absorbent booms, fence booms.

## **6 Operational procedures**

### **Spillages on highways**

- 6.1 ICs should consider whether chemical incident procedures are appropriate or additional resources are required
- 6.2 If, after due assessment, an IC deems there to be a requirement for immediate fire service action i.e. a public safety, pollution control, or management of a hazardous materials issue, the following guidance may apply in addition to the respective policy.

- (a) Flammable liquids should be prevented from entering drains or surface water by, for example, the use of sand and allowed to evaporate, away from ignition sources.
  - (b) Oils should be prevented from entering drains and surface waters. The oil should then be soaked up using proprietary absorbents, grab pack or sand as available.
  - (c) Acids should be neutralised by the use of soda ash.
  - (d) Other chemicals should be contained and soaked up using proprietary absorbents, large spill kit or sand as available.
  - (e) Any used absorbents must be disposed of correctly, double bagged and labelled, using the grab pack equipment. Brigade control can contact the EA for guidance and advice on responsibility.
  - (f) Any discharge to the sewerage system in an emergency situation, where prior consent has not been given, must be communicated to the sewerage undertaker as soon as possible after the event via Brigade control.
  - (g) For non-emergency discharge to the sewerage system, prior consent must be sought from the sewerage undertaker.
  - (h) Any decision to control traffic (e.g. in the event of a slippery road) should be referred to the police or carried out in accordance with Policy number 979 – Rescue - NOG, pending police arrival.
- 6.3 The Brigade is often called to spillages following a Road Traffic Collision ( RTC) or spills of non-hazardous materials. The IC must assess whether this spillage is to be designated a confirmed chemical incident (see Policy number 796– HAZMATS; fires and incidents involving hazardous substances) or an incident where pollution control is required. (See appendix 1 for EA notification criteria).
- 6.4 After carrying out emergency action operational crews may come under pressure to wash the road to bring it back into use. Although carried out with the best intentions this duty is not the responsibility of the fire service and if pollution occurred as a result of this action the Brigade may be liable to prosecution.

### **EA on scene protocols**

- 6.5 On arrival at the scene where there is a fire attendance, the EA officer's first task will be to make themselves known to the IC.
- 6.6 Depending upon the situation, they will assess the scene and offer appropriate advice to prevent or mitigate pollution. In cases where the source of pollution is unknown, the EA officer's task will be to locate the source, as well as to prevent and/or mitigate further effects. In all cases, even if legal action is not taken, detailed records of the resources expended will be kept, as the EA will usually seek to recover its costs.
- 6.7 The IC should request that the EA are informed of all incidents as detailed in Appendix 1. This will normally be done by Brigade Control:

### **End of incident**

- 6.8 The IC should consider the bio-security of the incident location. Bio-security is the prevention of unwanted spread of harmful organisms, pests, pathogens or invasive species from one site to another.

- 6.9 The IC must consider whether there has been any risk of infection arising from the incident and consider Policy number 707 - the control of infection and infectious diseases policy.
- 6.10 Decontamination of equipment should, where possible, be carried out before leaving the incident to prevent contamination being spread, in consultation with the HMEPO.
- 6.11 Contaminated fire kit should be removed in accordance with aide memoire number 7 of Policy number 584 - firefighter decontamination.
- 6.12 Gas tight suits or liquid tight suits as used by decontamination operatives will be disposed of in accordance with Policy number 796 - HAZMATS; fires and incidents involving hazardous substances.
- 6.13 Any other brigade equipment, particularly those that carry or contain water such as hoses and appliance water tanks, that has come into contact with a natural water source, e.g. ponds, lakes, rivers etc. should be washed off, rinsed or flushed with clean water from a hydrant prior to leaving the incident. Where this is not possible it should be completed on return to station.
- 6.14 All absorbent materials and equipment supplied by the EA in the form of grab packs or the large scale spill kit or other waste generated during the resolution of a chemical incident will be left in situ pending the safe disposal by the responsible person/appropriate authority. Under no circumstances will this waste be transported on any brigade vehicle, or stored on Brigade premises pending disposal. Using equipment supplied by the EA, this material together with any of the spill cleaned up by the Brigade, must be bagged and sealed using the ties provided, and clearly marked using the EA waste material tape to identify the contents as waste material for collection. The duty of care for the disposal of this waste is the responsibility of the premises or landowner, vehicle owner, highway authority or other (see table) as appropriate. Notification will be done through brigade control. When identified, and in conjunction with the HMEPO/SA, the responsible person must be clearly informed of the nature of the waste/contents of the disposal bag(s) and that it should only be removed by a specialist waste contractor.

Location of incident	Responsibility for disposal
Public footpath, public land or roadways other than motorway or trunk road.	Local authority.
Motorway or trunk road.	Highways Agency, or its appointed agent.
Private premises, land or vehicle.	Land owner, site occupier or owner.
Main rivers, non-tidal.	Environment Agency.
Main rivers, tidal.	The Port of London Authority.
Greater London authority road network.	Transport for London Street Management, or its appointed agent.

## 7 References

For assistance please contact the HMEP team

- Control of Major Accident Hazards (COMAH) regulations 2015
- The environmental permitting (England and Wales) regulations 2016
- Wildlife and Countryside Act 1981 as amended
- Countryside and Rights of Way Act 2000
- Natural Environment and Rural Communities Act 2006 as amended
- Environmental Damage (Prevention and Remediation) (England) Regulations 2015 as amended
- Environmental Liability Directive (ELD) Directive 2004/35/EC as amended
- Directive 2004/35/EC of the European Parliament and of the Council on environmental liability
- Clean Air Act 1993 as amended
- Road Vehicles (Construction and Use) Regulations 1986 as amended
- Pollution Prevention and Control Act 1999 as amended
- Fire and Rescue Service Act 2004
- Policy number 859 - Controlled burn
- Policy number 796 - HAZMATS; fires and incidents involving hazardous substances
- Policy number 747 - polluting material storage and spillage procedure
- Policy number 707 - the control of infection and infectious diseases policy
- Policy number 908 - Environment Agency grab pack and large spill kit - technical information.
- Policy number 979 – Rescue - NOG
- F6171
- SSSI sites on SharePoint

## Appendix 1 - Pollution control at incidents aide memoire

Pollution control at incidents Aide-memoire (contained within the grab pack)

Consideration:

- Assess risk to the environment.
- Is there danger to life or health?
- Do not compromise crew safety or operations.
- Mitigate the effects of pollution (air/liquids/solids).
- Inform and liaise with water/sewerage undertaker and Environment Agency.
- Seek advice from hazardous materials and environmental protection officer (HMEPO).

Inform the Environmental Agency and water/sewerage undertaker for:

- All hazardous materials, excluding gases, except where a water spray/fog is used to contain or disperse a gas cloud e.g. chlorine or ammonia.
- Pesticides or fertilisers.
- Major incident is declared.
- Six pumps and/or two or more jets in use and or high volume pumps (HVP) in use.
- Firefighting foam is used, excluding domestic fires.
- A 'controlled burn' is being undertaken or considered.
- Flooding of property from watercourses.
- Chemical, Biological, Radiological and Nuclear (CBRN) and or the use of mass decontamination procedures.
- Radioactive materials.
- Hazardous fly-tipped waste.
- Hazardous waste absorbed by one grab pack or more.
- Illegal burning of waste or fires involving burning of waste (above domestic quantities) (notification may originate from a member of the public and not involve the attendance of Brigade personnel).
- Environment agency regulated sites (e.g. COMAH, landfills, scrap yards).
- An identified high risk unregulated site agreed between the Brigade and the local Environment Agency (e.g. timber treatment sites).

Additionally environment agencies should be notified when it is confirmed that quantities of products involved reach the following thresholds.

- 25 litres of oil or fuel.
- 25 litres or more of detergents e.g. washing powder, washing up liquid, shampoos, soaps, car cleaning products, etc.
- 25 litres of disinfectants including household bleach, Dettol, etc.
- 25 litres of all types of paints and dyes.
- More than 25 litres of cooking oils, glycerine, alcohols.
- More than 25 litres of cutting lube or water soluble polymers,
- 250 litres of food products. Of particular concern are sauces, sugars, salt, syrups, milk, cream, yoghurt and vinegar.
- More than 250 litres of any beverage, including all soft drinks, beers, lagers, wines, spirits.
- More than 250 litres of other organic liquids, including blood, offal, farmyard slurries, fire-fighting foam, sewerage sludge, anti-freeze.
- More than 500kg of sand, silt, cement, chalk, gypsum/plaster.

These threshold quantities are provided as an illustration. In the event of a spillage of any of these substances the EA must always be contacted. In environmentally sensitive areas, especially during 'low water flow' conditions, notification to the EA may be required below these thresholds.

It is often difficult to decide what quantities of polluting products are likely to result in damage to the environment. As a general rule, ICs should inform the EA when 'above normal domestic quantities' of products are involved in incidents or enter drainage systems. Ideally, notification that a pollutant or polluting activity is about to impact the environment should take place as early as possible. The following are examples of situations when notification should be initiated by the IC.

Seek agreement with the Environment Agency or water/sewerage undertaker before:

- Polluting materials are likely to, or have entered drains or a watercourse.
- Decontamination of personnel is about to take place.
- Before or when firefighting foam is deployed, excluding small vehicle fires.
- Incidents are on or adjacent to watercourses.
- Stacked waste material such as tyres, fridges, etc. are involved in a fire.
- Before decontamination of operational equipment, unless in previously agreed areas.

This is not a definitive list and at times there may be incidents that do not fall into any precise category and if any doubt exists the EA should always be contacted.

## Appendix 2 - Key point summary - Environment Agency – incorporating the grab pack and large spill kit

### Information on task or event

- Type of pollutant.
- Route of pollution into the environment.
- Location of high risk sites – SSSI.

### Information about Resources

- EA grab packs.
- OSU large spill kit.
- On site resources (oil separators – interceptors).
- Flood barriers.

### Information about Risk and Benefit

- Consult on site specialist.
- Quantities involved.
- EA notification trigger points.
- Environmental damage.
- Life risk.
- Location.

## Gathering and thinking

### Objectives

- Prevent pollution of the environment.

### Communicating

- Environment Agency.
- Sewerage undertakers.
- Advice from HMEPO and SA.
- Site owner, operator.
- Local Authority environmental health and emergency planning officers.
- HSE.
- DEFRA.
- Port of London Authority for tidal River Thames.

### Controlling

- PPE.
- Risk assessment.
- Working on, in or near water.
- Infection control.
- Hazardous materials.
- Working in confined spaces.
- Controlled burn.
- Dispersal into the atmosphere.
- Disposal of waste material.

### Plan

- **Control of pollution**
  - Wind speed and direction.
  - Substances involved – heavier/lighter than air, soluble, toxic, flammable etc.
  - Methods to reduce "gassing off".
  - Sealing leaks.
  - Absorbition with inert materials.
  - Blanketing with foam.
  - Cooling overheating containment systems.
  - 'Washing' or containing/directing the gas/vapour cloud with water sprays and curtains.
- **Containment of polluting material**
  - Contain at source.
  - Contain close to source.
  - Containment on the surface.
  - Contain in the drainage system.
  - Contain in or on the watercourse.
- **Disposal of waste materials**
  - Leave with polluter
  - Leave with responsible person

## Document history

### Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	29/06/2020	SDIA	H - 24/06/2020	HSWIA	24/06/2020	RA	20/06/2020
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### Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Page 10 Para 6.3b	Update of legislation references.	16/11/ 2012
Pages 3,4 and 7 Para 2.2, 2.3, 4.5	Update lists; 2.2, 2.3, 4.5 to reflect those in 'Fire and Rescue Manual, volume 2, Fire Service Operations.'	16/11/2012
Appendix 1,2,3	Inclusion of Policy number 372 'Grab Pack', Policy number 373 'pollution prevention and control at incidents' & Policy number 459 'Large grab pack as appendices.	16/11/ 2012
Throughout	All images now have a LFB image library reference.	16/11/2012
Page 11 Page 4 and 6	Associated policies added as section 7 on page 11. Hyperlinks to policy number 527 have been updated to policy number 796 pages 4 6and 7.	16/11/2012
Page 11	References to cancelled PN324 and PN325 removed.	22/03/2013
Page 30	Key point summary removed from page 2 and new appendix 5 – key point summary flowchart added.	13/08/2014
Page 31	Subject list and FOIA exemptions tables.	28/10/2014
Page 2 and Page 11	2.2 (d) 'four pumps' changed to 'six pumps'. Appendix 1, bullet point 4 under 'Inform the Environment Agency' 'four pumps' changed to 'six pumps'.	13/03/2015
Throughout	This policy has been reviewed as current no changes were necessary.	28/09/2015
Throughout	This policy has been updated/amended throughout, please reread to familiarise yourself with the content. The technical information from this policy has been transferred to the new PN908.	20/07/2016
Para 3.7 Para 3.2, 3.7 and references Para 1.4 Para 3.11 Assessments	Removed reference to Water Resources act 1985 as not valid. Environment permitting regs updated from 2010 to 2016, and hyperlinks amended. Text "as amended" added to references. COAMH regs updated 1999 to 2015. "as amended" added after 1993, 1999 and 1986 dates. EIA, SDIA, HSWIA dates updated.	17/08/2017
Throughout	This policy has been reviewed as current with minor changes made throughout,	30/06/2020
Throughout	All cross references to cancelled policies have been updated.	04/03/2022
Throughout	Reviewed as current with no changes.	21/04/2023
Front page	Update to owner and responsible work team.	11/05/2026

## Subject list

You can find this policy under the following subjects.

Incident management	Incident type
Risk	Liaison with agencies
People	Risk planning
Control room	Risk management
Environment	Training
Environment agency	Mobile data terminals (MDT)
Large spill kit	Grab pack
Flowchart – key point summary (KPS)	

## Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

Considered by: (responsible work team)	FOIA exemption	Security marking classification