**Prevention of pollution from oil, fuel, and hazardous chemicals**

**Scope**

This procedure applies to all KCC sites that store and use bulk oil, fuel and hazardous chemicals which fall under the responsibility of the KCC services. This also includes bulk storage of waste oil, fuel, and hazardous chemicals. Outside and underground bulk storage (e.g., tanks, IBCs, and larger capacity containers) and pipework are deemed a higher risk.

This procedure does not apply to oil, fuel and hazardous chemicals which fall under the responsibility of the Facilities Management contractors, but it is expected that they work with services to make sure this procedure is implemented.

Where KCC services procure and use household type cleaning and maintenance products within the buildings these are deemed low risk in terms of causing environmental pollution. Compliance with the Control of Substances Hazardous to Health (COSHH) regulations for these low-risk products falls under the Health and Safety responsibilities of service staff and not covered by this procedure.

**Risk assessment**

All activities which could cause environmental pollution (ground or water) or cause air pollution arising from a fire must be risk assessed using the appropriate risk assessment template:

* See **appendix 1** for the Fuel oil storage and delivery risk assessment checklist
* Use the COSHH template for hazardous substances (cleaning, maintenance, garden, and pest control) (available on KNet/KELSI)
* Use the fire risk assessment template (any oil or fuel stored should be identified as additional combustible sources) (available on KNet)

**Storage**

All oils, fuels and hazardous chemicals need to be stored securely and away from surface water drains and watercourses. Bulk oil and fuel need to be stored in a double-skinned or bunded container in order to prevent escape into the environment (see **appendix 1**).

Smaller quantities should be stored in locked cabinets or inside the main building segregated from different types/incompatible chemicals.

Bunds/secondary containment used to contain hazardous chemicals (including waste chemicals) must be able to contain all the liquid stored in the container (or the largest container if there is more than one), plus an extra 10% capacity for rainfall and firefighting water.

Flammables should be stored in locked fireproof/metal cabinets or a designated outside secure, locked storage area. Refer to [www.hse.gov.uk](http://www.hse.gov.uk/fireandexplosion/storageflammliquids.htm) for more information.

**Disposal of waste**

Waste chemicals, oils and fuels or materials contaminated with these substances such as oily rags or spillage granules are classed as hazardous waste. Wastes must be contained (e.g., original container or double bagged), labelled appropriately with contents, segregated from other chemical products and stored appropriately as stated above. Disposal must comply with the KCC Control of Waste procedure (OP 1) (available on KNet).

**Communication and training**

All sites deemed at higher risk (see Scope above) of causing environmental pollution should display **appendix 2** in a prominent place in the building to remind staff of the action to take in case of a spillage.

All staff should be made aware of this notice and its importance. For sites managed under facilities management there is now a single helpdesk for logging all issues, operated by Skanska who can be contacted via **0800 901 2464** or [KENTHELPDESK@skanska.co.uk](mailto:KENTHELPDESK@skanska.co.uk)

All employed KCC staff that supervise or directly deal with oil, fuel or chemical deliveries and storage, cleaning or handyman type maintenance tasks must be aware of and have read the relevant risk assessment (see **appendix 1**). These staff must also receive instruction and be competent to:

* Deal effectively with a spillage using the correct spill kit or clean up materials
* Know how to dispose of contaminated clean up materials correctly (please refer to the KCC Control of Waste Procedure (OP 1)).
* Know who must be notified within KCC and external agencies (e.g., Environment Agency), including where necessary the emergency services (see **appendix 2**).
* Review the incident, formally report it, and take necessary corrective actions.
* Undertake regular spill drills onsite to test emergency procedures.

**Reporting incidents (see Appendix 2)**

## In the event of an incident, a decision needs to be taken on whether the Environment Agency (EA) should be notified; this should be discussed with the Programme and Business Services team (KCC Environment Team) promptly. (Contact Matthew Williams 03000 414651 or Emma Clarke 03000 411471 or by email, [scc@kent.gov.uk](mailto:scc@kent.gov.uk))

* **It is recommended that in all cases the Programme and Business Services team oversee any liaison with the Environment Agency**, so prompt notification is the first step to ensure clear responsibility in this role\*
* Where a significant pollution event occurs outside of working hours, such as chemicals, fuel or oil entering a watercourse, surface water drains or open ground the **Environment Agency (EA) hotline (0800 80 70 60)** should be contacted immediately and subsequently notified to the Programme and Business Services team as soon as possible.
* Under no circumstance should a contractor inform the EA of any incident or discuss an incident on behalf of KCC unless authorised by KCC to do so (with the exception of out of normal working hours, where a KCC officer cannot be contacted).
* Report back to the Programme and Business Services team clarifying the following:
  + When and where the incident occurred
  + The nature of the incident
  + Relevant persons Involved
  + What mitigating action was taken
  + Need for any further remedial action
  + Confirm who has already been in contact with the EA
  + Confirm the EA incident reference number and EA investigating officer’s name, if known
* Note: Even if the event has not caused actual environmental damage but had the potential to   
  (i.e., Near Miss), please inform the Programme and Business Services team of the event and action taken that prevented actual pollution.

\*This is with the exception of waste sites and highways depots where site managers or contractors will have established EA contacts. Programme and Business Services team should be notified of any incident or Compliance Assessment Reports (CAR) issued at these sites to maintain a central KCC incident record.

**Appendix 1**

**Fuel oil storage and delivery risk assessment checklist**

Protection of the environment and property is vital. Fuel oil is a common and highly visible form of pollution because of the way it spreads. Just one litre of fuel oil could make a million litres of fresh water undrinkable. Although fuel oil is an intrinsically safe fuel, this checklist has been provided to aid a competent person to assess the risks associated with fuel oil storage.

Please also see the health & safety risk assessment guidance on KELSI and KNet.

It is good practice to insert the appropriate emergency contact details on the display poster **Appendix 2**, and display this in the vicinity of the fuel oil tank, and or where the delivery takes place.

**Location/Site:**

**Date of risk assessment:**

**Name of people/person(s) undertaking risk assessment:**

1. **ROAD TANKER ACCESS TO SITE**

If the tanker requires access onto your site to deliver fuel oil **complete A1 to A3** **then B onwards**. If the tanker parks on a public highway to deliver fuel oil complete **A4 only, then B onwards.**

**A1.** Can a large articulated vehicle drive on and off site, without obstructions (including height)? **Yes/No**

**Guidance:** If No - consider ordering a small/baby tanker; however, the load will be smaller

**A2.** Can the vehicle turn on site to enter and exit forwards? **Yes/No**

**Guidance:** Reversing on the public highway should be avoided. Any person directing a large goods vehicle needs to be trained. Wear a reflective waistcoat if directing the vehicle.

**A3.** Are pedestrians and other vehicle traffic segregated from the delivery area? **Yes/No**

**Guidance:** If No - action should be taken to restrict access to the area with special consideration to any public walkways, public rights of way on site i.e., elderly, disabled and children.

**A4.** Can you ensure the public footpath is not obstructed during delivery? **Yes/No**

**Guidance:** If No - signage or barriers must be provided to ensure pedestrians are directed to an alternative route.

1. **DELIVERY ACCEPTANCE PROCEDURE**

**B1.** Is there an ‘Authorised Person(s)’ available to receive the delivery and be in attendance with the driver at all times? **Yes/No**

If Yes - please detail the following for the authorised person:

**Name(s):**

**Job Title:**

**Contact Number:**

**Guidance:** The ‘Authorised Person’ should be at the delivery point at all times. If this is not possible, the driver must be told how to contact the ‘Authorised Person’ in the event of an emergency and that person should be able to get back to the offload point within approximately 2 minutes. **NOTE: If neither of the options are available, the delivery CANNOT proceed.**

**B2.** Is the ‘Authorised Person’ aware how to establish the existing contents and unfilled capacity in the tank before delivery and understand the procedure to be followed in the event of a spill? **Yes/No**

**Guidance:** If No - instruction to the authorised person needs to be undertaken as soon as possible by a competent person and in all circumstances, before the ‘authorised person’ supervises a delivery

**B3.** Is there a spill kit/spillage granule specifically for oil spills available and located close to the fuel oil tank and accessible during deliveries? **Yes/No**

**Guidance:** If No - obtain as soon as possible.

1. **FUEL OIL STORAGE TANK DETAILS**

**C1.** Are fuel oil storage tanks located inside or outside the building?

**Guidance: If inside go to C2 only then onto section D** Oil Storage Regulations for Businesses do not apply as the building should act as secondary containment. In addition, the tank should be located so can directly be ventilated to the outside. All good practice recommendations should be followed to prevent pollution. In addition, Building Regulations are likely to apply

**If outside skip to C3** Oil Storage Regulations for Businesses apply

**C2.** Are periodic checks conducted and action taken for visible leaks or spills and the condition of the floor and walls (i.e., visible damage) within the room containing the fuel oil storage tank? **Yes/No**

**Guidance:** If No - implement regular visual checks. Please see **Appendix 3** for example checklist

**C3.** If any outside storage tanks are below ground level, is the discharge into the tanks by gravity only? i.e., product should not be pumped **Yes/No**

**Guidance:** Pumping into ground storage is not permitted.

**C4.** Are all access points including taps, valves and delivery panels locked if accessible to non-authorised staff e.g., the public? **Yes/No**

**Guidance:** If No - these should be implemented

**C5.** Is the tank surrounded by a containing wall (bund) capable of holding the capacity of the largest tank + additional 10%? **Yes/No**

**Guidance:** If double skinned tank refer to guidance from supplier/maintenance company.

**C6.** Do all storage tank vents direct any fuel oil overflow into a bund? **Yes/No**

**Guidance:** Vents which open to atmosphere should have free airflow around them and no ignition source within 3 metres. On new tanks of the ‘tank within a tank’ design, the vent should feed directly into the outer tank shell. On tanks which are surrounded by a traditional external bund, the vent pipe should extend low enough such that all fuel oil spilt goes directly into the bund.

**C7.** Is the bund area periodically checked to ensure it is clear of water, vegetation, and storage of any other materials? **Yes/No**

**Guidance:** If No - these should be conducted as soon as possible, and any action needed must be taken. Please see **Appendix 3** for example checklist

**C8.** Are all storage tanks fitted with a working, calibrated tank gauge system or calibrated dipstick and is the maximum tank fill capacity shown somewhere on the installation? **Yes/No**

**Guidance:** The driver should not be required to use a dipstick or climb over any obstacle to read a tank contents gauge. The maximum tank fill capacity can be marked on the gauge or on the tank

**C9.** Is the tank fitted with a high-level alarm and is this tested periodically i.e., during system maintenance? **Yes/No**

**Guidance:** Activation of the alarm should be detectable to the driver at the offload point while the truck engine is running. Alarm can be audible or visual. If visual, lights should be bright so as to attract the driver’s attention immediately.

**C10.** For double skinned tanks, is an audible alarm fitted in case of a dramatic drop in the level of fuel oil? **Yes/No**

**Guidance:** If No - a method of establishing inner tank failure must be in place.

**C11.** Do you have a system for maintenance & regular inspection for the fuel oil storage facility? **Yes/No**

**Guidance**: If No - this should be implemented, and evidence should be available to demonstrate that the facility including the tank contents gauge receives inspections and maintenance.

**C12.** Can all the tank vent pipes be seen by the driver from the offload position? **Yes/No**

**Guidance:** If No - ensure the storage tanks are fitted with a physical tank overfill prevention device OR ensure an ‘Authorised Person’ is always available during the delivery who is positioned within sight of the vent pipe and who is in immediate contact with the driver.

**C13.** If any deliveries are to be made outside day light hours, are the delivery premises sufficiently lit to cover the storage tank, the tank vents, and the offloading area? **Yes/No**

**Guidance:** If No - consider preventing deliveries during hours of darkness.

**C14.** Is there suitable containment at the tank(s) inlets e.g., drip tray and is this emptied in an environmentally responsible manner after each delivery? **Yes/No**

**Guidance:** Drip tray should not leak. Any waste oil captured should be disposed of in a responsible manner as hazardous waste or removed by the delivery driver.

**C15.** Are pipes fitted with a non-return valve, a pump or similar to prevent fuel oil flowing back when the hose is disconnected? **Yes/No**

**Guidance:** If No - these should be fitted.

**C16.** Are the storage tanks positioned or protected in some way against impact by the tanker or other vehicles? **Yes/No**

**Guidance:** Either during access or egress. If No - contact Property to discuss suitable protection measures e.g., bollards.

**C17.** If there are any drains, open water, rivers, canals, or other watercourses within 10 metres of the tank, including on the public highway, is there means of preventing a spillage entering these? **Yes/No (please also give details)**

**Guidance:** The Authorised Person must be aware of the location of any particularly sensitive environments or water courses. If No - means of prevention need to be implemented.

1. **SPILL CONTAINMENT**

**D1.** Is there an oil spill kit on site? Does it contain granules/absorbents specifically for fuel oil spills and is it located close to the fuel oil tank and accessible during deliveries? **Yes/No**

**Guidance:** If No - this should be provided as soon as possible before delivery. Spill kit should be regularly reviewed for contents. Please see **Appendix 3** for spill kit checklist

**D2.** Are staff trained to deal with a fuel oil spillage and aware of how to dispose of contaminated hazardous waste and any PPE requirements? **Yes/No**

**Guidance:** If No – instruction should be provided by a competent person or the instruction booklet within the spill kit should be read in how to respond and how to use the spill kit. This procedure and **Appendix 2** of this document also details actions to take and processes/procedures to follow. Records should be available with regards to staff that have read the instruction and expiry/refresh date.

**If the answer to any of the above questions is ‘No’, an explanation of action taken should be outlined below:**

**Action details:**

**Owner:**

**Completion date:**

**Appendix 2**

**ATTENTION!**

**IN THE EVENT OF THE DISCOVERY OF A SPILLAGE OR LEAK OF HAZARDOUS LIQUIDS E.G. DIESEL, PETROL, CHEMICALS, FUEL / ENGINE OIL ETC.**

**THE FOLLOWING ACTION MUST BE UNDERTAKEN AS SOON AS POSSIBLE:**

1. **Isolate the source of the spillage if possible.**
2. **Wear suitable Personal Protection Equipment if appropriate.**
3. **Do not hose the spillage down or use any detergents.**
4. **Try to contain the spillage by placing absorbent materials such as granules, pads, sand, earth, and booms around the edge of the spillage, in order to prevent it spreading.**
5. **Place rubber mats or proprietary flexible drain covers over gullies, in order to prevent spilt contaminants entering drainage system.**
6. **Continue to apply absorbent products until liquid is absorbed and contained.**
7. **Inform your immediate superior and Facilities Management Helpdesk**

**0800 901 2464 or** [**kenthelpdesk@skanska.co.uk**](mailto:kenthelpdesk@skanska.co.uk) **who may need to appoint a contractor to assist with clean-up**

1. **Notify KCC’s environment team on 03000 414651 / 03000 411471 or by email** [**scc@kent.gov.uk**](mailto:scc@kent.gov.uk) **The team can advise on actions required and may take responsibility for liaison with the Environment Agency if the incident is significant.**

**24 Hour Emergency Hotline to report environmental pollution incidents**

**to the Environment Agency**

**0800 80 70 60**

**Appendix 3**

**Fuel Oil Tank and Bund – Inspection Checklist (Recommended Bi-Weekly)**

**Location/Site:**

**Date of inspection:**

**Name of people/person(s) undertaking inspection:**

1. **GENERAL INFORMATION**

**Tank type - Please tick which tank is onsite from the following list:**

Single skinned tank

Double skinned tank

Integrally bunded tank

Underground tank

Not known

**Guidance:** Please take steps to find out what type of tank you have e.g., request information from facilities management or search manufacturers information online.

**Does the tank have a secondary containment bund surrounding the tank e.g., a walled structure?**

Yes

No

**Is the tank/bund accessible to undertake this inspection?**

Yes

No

**Guidance:** If the tank/bund is not accessible due to overgrown vegetation or other accumulated debris etc, then please organise for this to be cleared as soon as possible.

**Please give details of any actions required:**

1. **FUEL OIL LEVEL CHECKS**

**Gauge type – Please tick which gauge is onsite from the following list:**

Mobile device e.g., Watchman

Fixed gauge

Dipstick

Other (please give details)

**Is the gauge working?**

Yes

No

**Please give details of any actions required:**

**Record the fuel oil level in litres:**

**Are levels lower than expected?**

Yes

No

**Guidance:** If a sudden drop in fuel oil level is noticed, then please notify the facilities management Helpdesk or KCC Environmental Team as detailed in **Appendix 2**. If your gauge is not working, please organise for this to be fixed as soon as possible.

**Please give details of any actions required:**

1. **TANK INSPECTION**

**Is there any visible deterioration of the tank? Please tick all that are relevant below:**

Rust

Dents

Cracks

Holes

Other (please give details)

None of the above

**Guidance:** If any deterioration is noticed, please follow **Appendix 2** instruction, and contact your facilities management Helpdesk immediately to inspect the tank.

**Please give details of any actions required:**

**Is there any evidence the tank is leaking? Please tick all that are relevant below:**

Sudden drop in fuel oil levels

Drips or seepage from the walls

Drips or seepage from the pipes

Pooling of liquid

Fuel oil staining

Other (please give details)

None of the above

**Guidance:** If any evidence of leaking is noticed, please follow **Appendix 2** instruction, and contact your facilities management Helpdesk immediately to inspect the tank.

**Please give details of any actions required:**

**Does the tank look deformed? Please tick all that are relevant below:**

Walls of tank caved in

Walls of tank has dents

Other (please give details)

None of the above

**Guidance:** If any evidence that the tank is deformed, please follow **Appendix 2** instruction, and contact your facilities management Helpdesk immediately to inspect the tank.

**Please give details of any actions required:**

1. **BUND INSPECTION**

**Is there any visible deterioration of the bund? Please tick all that are relevant below:**

Cracks

Holes

Pipework installed through bund (only an issue if no seal around the hole)

Other (please give details)

None of the above

**Guidance:** If any deterioration is noticed, please follow **Appendix 2** instruction, and contact your facilities management Helpdesk to inspect the bund.

**Please give details of any actions required:**

**Is there accumulation of water in the bund?**

Yes

No

**Guidance:** If there is accumulation of water, please organise for this to be pumped out. If any fuel oil is noticed on the water surface, use an absorbent pad from the spill kit to soak this up before pumping the water out. Dispose of any oily absorbent pad as hazardous waste via your facilities management Helpdesk or waste contractor. Ensure any oily waste is double bagged and labelled and stored away from other chemical products.

**Please give details of any actions required:**

**Is there evidence of anything in the bund? Please tick all that are relevant below:**

Debris e.g., leaf matter

Stored materials

Vegetation growing

Other (please give details)

None of the above

**Guidance:** If anything is being stored or has accumulated within the bund, please organise for this to be removed.

**Please give details of any actions required:**

1. **SPILL KIT INSPECTION**

**Is an oil spill kit available in close vicinity of the tank in case of emergency?**

Yes

No

**Guidance:** If no oil spill kit is available onsite, then one should be purchased in case of a spill. If a spill kit is available onsite but is not in close vicinity of the tank, clear signage should be in place to indicate where the spill kit is stored.

**Please give details of any actions required:**

**Is the emergency spill response instruction (Appendix 2) displayed on the tank or in close to the tank?**

Yes

No

**Guidance:** **Appendix 2** which details emergency spill response instruction should be laminated and attached to the tank or in close proximity for use in case of an emergency.

**Please give details of any actions required:**

**Does the spill kit have sufficient spill materials and equipment? Please tick all that are contained within the spill kit as detailed below:**

Absorbent pads

Absorbent socks

PPE e.g., gloves and safety glasses

Waste disposal bags

None of the above

**Guidance:** The spill kit should contain sufficient spill materials and equipment and a small stock of spare materials should be purchased so there are always spares available.

**Please give details of any actions required:**

1. **ACTIONS REQUIRED**

**Please detail any actions identified in this checklist in the section below:**

**Action Details:**

**Owner:**

**Completion date:**

**Action Details:**

**Owner:**

**Completion date:**

**Signed:**

**Date:**