



MARSH INDUSTRIES >
Leaders in off-mains drainage

Spill Response Plan

Units 2-20

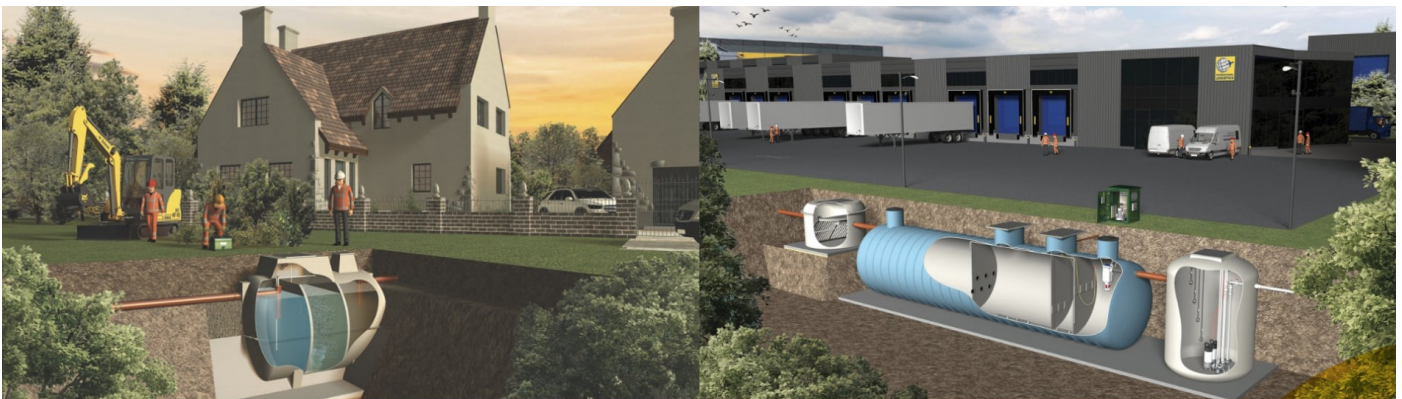
Addington park Industrial Estate

Little Addington

Kettering

Northamptonshire

NN14 4AS



Marsh Domestic

Water and wastewater treatment products

Marsh Civils

Water and wastewater treatment products





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Spill Management Plan

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1. Purpose

The purpose of this Spill Management Plan (“SMP”) is to detail spill prevention, preparedness and response requirements to support the safe response to accidental spills, leaks or releases of both hazardous and non-hazardous materials to the environment (releases to land and / or water); to eliminate or minimize the adverse effects should a spill occur and to protect the health and safety of employees.

2. Scope

This SMP applies to the Site managers (Spill Response Coordinator and Alternate Spill Response Coordinator), Site Personnel (employees) and contractors at the Marsh Industries Little Addington site

The Site consists of 7 buildings (units), two units are used for spraying, two units are used for assembling the tanks, 1 unit is a mixture of office and assembly (with a small amount of spraying) , 1 chemical store and 1 porta cabin used for offices .

Table 1: Site Information

Category	Information
Owner, Site Location and Mailing Address	<p>Steve Boyer</p> <p>Marsh Industries Limited,</p> <p>Units 2-20 Addington Park Industrial Estate, Little Addington, Kettering, Northamptonshire, NN14 4AS</p> <p>Phone: 01933 654 582</p> <p>Email:</p>
Site Surroundings and Access	<p>The surrounding area includes industrial units, residential and agricultural property uses. Access to the Site is from Concession Road 7. Industrial units</p>

A Site plan identifying the key areas of the Marsh Industries is provided in Figure 1 – Site Plan.

3. Roles and Responsibilities

The Spill Response Coordinator (or designated Alternate) has the following responsibilities:

- In case of a spill, responding to the spill location and taking charge or ensuring someone takes charge of containing the spill and ensuring the safe handling, clean-up and proper disposal of spill residues and clean-up materials.
- Reporting the spill internally (to the Environmental, Health and Safety Manager, Production Manager and/or Senior Management) and externally (as required) and ensuring a Spill Investigation form is completed including an investigation of the causes of the spill and evaluation of actions taken to respond to the spill event;
- Ensuring Material Safety Data Sheets (“MSDSs”) are readily available and current for all hazardous materials used on Site be in contact with, including flammable and combustible liquids;
- Establishing specialized training for responding to chemical spillages/releases
- Ensuring spill response equipment is readily available at critical points of use at all times; and
- Ensuring that all employees are trained and knowledgeable of this SMP, and that the SMP is updated as needed.

Site Personnel (employees) must:

- Participate in spill training including general response procedures and notification requirements. Personnel, and their supervisors, will be trained on techniques to effectively contain a spill (i.e. spills of fuels and chemicals) as well as how and when to notify the Spill Response Coordinator; and
- Immediately notify their Supervisor, the Spill Response Coordinator or in their absence, the Alternate Spill Response Coordinator in the event of a spill.

Contractors must:

- Review and understand their obligations under this SMP, including general response procedures and notification requirements, prior to commencing work at the Site; and
- Immediately notify the Spill Response Coordinator or in their absence, the Alternate Spill Response Coordinator in the event of a spill.

4. Spill Management Plan

The purpose of spill management planning is to document and assess the risk of potential spills in order to identify appropriate procedures and mitigating actions to respond to a spill. Potential spill sources / areas are described below:

The following table identifies the fuels / oils / Chemicals stored and handled on- Site:

Product	Container	Use / Purpose	Controls
Diesel	One (1) 1400 L Bunded tank	The Diesel fuel is used to fuel the forklift trucks.	<ul style="list-style-type: none"> The Diesel tank is situated on a concrete pad Drip trays are placed at fueling connection points to capture any releases. A Fueling Procedure is in place and Site Personnel responsible for fueling have received appropriate procedural training. The Fueling Procedure and Spill Response Procedure are (see Section 6 – Spill Response Procedure) posted in the fueling area. The diesel Fueling Area is subject to weekly inspections.
Resins	Quantity of 1000 L IBC's 5L,10L Buckets	One part of the mixture that creates GRP (fibre-glass) Hand lay up	<ul style="list-style-type: none"> All IBC's will be stored on bunds that are 110% in the production areas. The IBC storage area(chemical store will be bunded) Decanted resin will have lids secured when not in use Only small quantities will be decanted
Catalyst (organic peroxide)	Quantity of 25L Containers 80ml Catalyst dispensers	One part of the mixture that creates GRP (fibre-glass)	<ul style="list-style-type: none"> Catalyst is stored in flammable chemical store Only quantities need are taken to work area Catalyst dispensers are locked away in flammable cabinets when not in use
Flow Coat	Quantity of 250L Drums 5L, 10L Buckets	Used as a based coat(primer) or top coat on tank moulds Touching up / painting tanks by hand	<ul style="list-style-type: none"> Drums are always left sealed and pumps inserted into top to extract Drums stored on bunds that are 110% of largest vessel Decanted Flow coat will have lids secured when not in use Only small quantities will be decanted
Aerosols(i.e Spray paint, Wd40, silicone)	Small quantities	Used in production units	<ul style="list-style-type: none"> Stored in chemical cabinets in store room



Product	Container	Use / Purpose	Controls
Chemlease PMR 90	5 L container	Waxing/ release agent applied to moulds to help release finished product	• containers are kept in flammable cabinets when not in use
Com 300 (wax)	25l Drum	Waxing/ release agent applied to moulds to help release finished product	• small quantities applied to moulds via rags
Sudaflex	600ml tubes	Strong silicone used applied to tank joints	• waste tube pellets to be placed in bins

The locations of the following potential spill sources / areas are shown in Figure 1 – Site Plan:

- Unit 2 Tank Assembly— Bunded Chemical cabinet which stores 250l Acetone barrels, bunded chemical cabinet which stores 25l containers organic peroxide
- Units 3-8 Spray (Tank Moulds) — 1000L IBC's of resin x 3, 250L barrels of flow coat x 4 , 1 Chemical cabinet with acetone, 1 chemical cabinet with
- Units 9-13 Tank Assembly— 5l– 10l buckets of flow coat
- Units 14-16 Spray (Baffles) — 1000L IBC of resin x 1, 250L barrels of flow coat
- Units 19-20 Small Component Build Area—
- Chemical Store — 1000L IBC of resin x 20,

5. Identified Receiving Bodies of Concern

There are no watercourses or water bodies located at the Site, there is a drainage ditch directly to the north of the site behind the chemical store. 1130 metres to the south east is Stanwick lakes, which is a site of special scientific interest(SSSI), Also the same distance in the same direction is the River Nene.

Any surface water runs off into various drains around the site marked on Figure 1– Site plan

6. Preventive Measures

Appropriate measures should be taken to prevent the occurrence of a spill. Assigned Site Personnel are responsible for conducting regular inspections of the preventive measures implemented on-Site. All Site Personnel and contractors are responsible for following training, operating procedures and work instructions set out and required by Marsh Industries.

On-Site re-fueling of equipment is only conducted by Site personnel who have received appropriate training. Site personnel follow a documented Fueling Procedure which is posted in the fueling area along with a copy of the Spill Response Procedure. Drip trays are placed at fueling connection points to capture any releases.

Drums, IBC's and containers of chemicals on Site should be stored in the chemical store , where possible, and be provided with secondary containment. Drums / containers should be kept away from vehicular traffic and heavy equipment.

The each area is inspected on a daily basis and any leaks identified are immediately cleaned-up. Documented site inspections are conducted regularly to ensure any equipment or container leaks are identified and addressed before they become bigger issues. Small leaks and spills are cleaned-up immediately.

Spill kits are located in high risk areas and regular documented inspections are conducted to ensure the spill kits are fully stocked.

Up to date Material Safety Data Sheets ("MSDS") are maintained on-site for all applicable materials. This Spill Response Procedure is posted in the notice boards



7. Spill Response Procedure

The primary steps to take in the event of a spill are as follows:

- A. **Assess the spill.** Protect the health and safety of Site personnel and the public (in the event of immediate public safety or health risk, i.e. explosion or fire contact 999 immediately).
- B. **Notify the Spill Response Coordinator of the spill.** All Site personnel shall immediately notify the Spill Response Coordinator or in their absence, the Alternate Spill Response Coordinator, or on-Site Supervisor, of any spill situation. The Spill Response Coordinator, or Alternate, will direct all aspects of any spill incident.
- C. **Identify the material.** Wear appropriate personal protective equipment (refer to the appropriate MSDS) before proceeding with spill response activities. See **Appendix C** for MSDS for fuels, oils, and chemicals stored / handled on-Site.
- D. **Evaluate the size of the response to be initiated.** Determine if the spill response and clean-up can be handled by Site personnel or whether the assistance of a spill response contractor is required. Refer to **Appendix A** – Emergency Contact Information for applicable contact numbers.
- E. **Decide whether or not Site personnel need to be evacuated from the area.** If evacuation is required, the Spill Response Coordinator, or Alternate, is responsible for ensuring that all Site personnel are safely evacuated from the building / area. Should the Spill Response Coordinator, or Alternate, not be available, an on-Site Supervisor may take the lead on evacuation, if required.
- F. **Stop / contain the spill, only if safe to do so.** Stop and contain the spill if possible and only if it is safe to do so in order to prevent further release. If possible, plug the leak from the drum, tank, or pipe with plugging compound. Deploy sorbent socks around the spill then dike the spill to prevent it from spreading. Turn off engines and other sources of ignition (i.e. cigarettes), if applicable.
- G. **Prevent the spill from entering nearby watercourses.** Use all available materials to contain the spill to prevent it from reaching the low-lying area on-Site and away from any watercourse. Cover/ block all drains, ditches, etc. with drain covers, booms or diking materials.
- H. **Protect the affected area.** Protect the spill area as necessary, including the equipment and materials exposed to the spill. (Do not drive equipment through the spill and around the Site, this just increases the area requiring clean-up).
- I. **Report the spill as soon as possible.** Only the Spill Response Coordinator, or Alternate, will notify the appropriate internal and external parties Referring to Appendix A – Emergency Contact Information for applicable contact numbers. Refer also to Section 6.2, Reporting Requirements.
- J. **Clean up the spill.** When the spill is contained, place sorbent on the ground at the outer edge of the spill. Then work your way with the sorbents towards the center of the spill.

- K. **Have back-up absorbent available.** In the event that the spill is larger than the available sorbent capacity within the spill kit, obtain back up absorbents from other spill kits. Sand that may be available on-Site can also be utilized as sorbent for larger spills.
- L. **Complete the Spill Investigation Form.** Complete the Spill Investigation Form (Appendix B) and distribute to the Environmental, Health and Safety Manager, Production Manager (Alternate Spill Response Coordinator). Include photos if possible.
- M. **Dispose of all spilled material and spent absorbent.** Collect spilled material / spent absorbent/ impacted soil in drums , properly label the contents and date of the drum and place it in a secure storage area. All waste is to be handled and disposed of in accordance to the local government requirements Refer also to **Section 10**, Disposal of Spilled Materials.
- N. **Replenish spill kits.** Take an inventory of all on-Site spill kits and replace all used sorbents.

8. Spill Response Equipment and Safety Considerations

- A. Spill response equipment must be maintained and readily available on-Site. Absorbent materials must be stored in high risk areas (i.e. Chemical Store).
- B. Depending on nature of the potential spill sources / areas (i.e. quantity, physical and chemical characteristics), the spill kits may contain the following:
- Absorbent pads, pillows, socks;
 - Hydrophobic spill booms, of suitable size and length, to contain the spill in the ditch;
 - Absorbent material (i.e. clay absorbent) to absorb spills to the ground;
 - Dust-pan/ brooms;
 - Non-sparking shovel;
 - Neoprene drain cover(s);
 - Spilled material container / drum / bags;
 - Nitrile gloves;
 - Warning tape.
- C. At minimum, the following personal protective equipment (“PPE”) is kept within or in the vicinity of the spill kits, to assist with spill clean-up:
- Safety goggles;
 - Neoprene gloves;
 - Respirators with appropriate filters, if required (as identified in MSDS); and
 - Neoprene coveralls and/or aprons, if required (as identified in MSDS).

The Spill Response Coordinator must ensure that regular inspections of spill response equipment / kits are completed to verify availability and whether maintenance / replacement of any equipment is warranted.

Spill kits are maintained on Site in the following areas:

- Unit 19 Stores

The locations of the on-Site spill kits are shown in Figure 1 – Site Plan



9. Reporting Requirements

In the event of a spill, employees and contractors (if applicable) are required to immediately notify the Spill Response Coordinator, or Alternate, who are then required to notify the Environmental, Health and Safety Manager, Production Manager (Alternate Spill Response Coordinator) and Senior Management.

The Spill Response Coordinator, or Alternate, will notify any external parties if required, as soon as possible. Internal and external contact numbers are available in Appendix A - Emergency Contact Information. The following information must be provided when reporting a spill. Make sure you prepare and keep a record of the telephone call when making a spill report, documenting what was said.

- A. Your name and phone number;
- B. Nature of release (i.e. spill, leak, fire or explosion);
- C. Potential Impact on people, property, and environment;
- D. Date / time / location of spill;
- E. Type / quantity of substance released;
- F. Brief description of site and surrounding area;
- G. Circumstances leading up to the event;
- H. Resulting contamination; and
- I. Remedial action being taken/required.

A reportable spill is a release,

- into the natural environment,
- from or out of a structure, vehicle or other container,
- and that is abnormal in quality or quantity in light of all the circumstances of the discharge.

A reportable spill includes:

- Any spill that has the potential to cause an adverse effect to the environment, other than those which can be readily remediated through clean-up and restoration of paved, graveled or sodded surfaces. Remediation must be carried out immediately; and
- any spill that enter waters or is likely to enter waters directly or through drainage structures.



10. Disposal of Spilled Materials

Free standing liquids are usually removed by vacuum truck.

Spilled material / spent absorbent / impacted soil should be placed into labelled, poly-lined drums, or other sealed containers.

Larger quantities of impacted soil should be placed on a hard surface, if possible, tarped (both over and under the stockpile) and secured with sand bags or other ballast to keep storm water out.

Spilled material / spent absorbent / impacted soil should be stored in a secure storage area until it can be removed for disposal.

All contaminated material / spent absorbent / soiled waste will need to be disposed off in accordance with the European directives on waste and hazardous waste. Do not flush into surface water or sanitary sewer system. waste is considered a hazardous waste and must be disposed of at a landfill licensed to accept hazardous waste.

11. Training Requirements

All employees are expected to be fully aware of the Company policies and emergency procedures.

Within the first months of being hired, new employees will be trained on spill response as part of their new hire orientation. The orientation will include, but will not be limited to, an overview of this SMP document with emphasis on reporting requirements and spill prevention techniques, location and use of emergency equipment such as relevant PPE, fire extinguishers, spill kits, etc.

After the initial orientation, all employees will be retrained on spill response and pollution prevention every 12 months thereafter.

The Production Managers are responsible for scheduling and arranging for the orientation with the Environmental Health and Safety team. The annual spill response training will be organized by the Environmental Health and Safety team. . Records of training will be retained including the trainees name and signature, the date on which training was provided and the name of the trainer.

Appendix A: Emergency Contact Information (Marsh Industries, Little Addington)

Role	Name	Position	24 Hour Telephone Contact Number	E-mail
Spill Response Coordinator	Mark Throne	Health and Safety Coordinator		Mark.thorne@marshindustries.co.uk
Alternate Spill Response Coordinator	Kreshnik Hoxhaj	Works Manager	07515 470 106	Kreshnik.hoxhaj@marshindustries.co.uk
	Nikita Taskalovs	Production Manager	07845 972 144	Nikita.taskalovs@marshindustries.co.uk
Environmental	Paul Sales	Environmental, Health & Safety Manager	07551 252 220	Paul.sales@marshindustries.co.uk
Senior Management				
EXTERNAL CONTACTS			Telephone	
Fire / Police Department (24/7)			999	

11. Appendix B: Spill Investigation Form

Marsh Industries LTD			DATE OF SPILL:	
Units 2-20 Addington Park Ind Es			TIME:	
Little Addington, Kettering			<input type="checkbox"/> A.M.	
Northamptonshire			<input type="checkbox"/> P.M.	
NN14 4AS			LOCATION OF SPILL:	
SUBSTANCE (INCLUDE SDS IF POSSIBLE):			MOECC / SAC CALLED: <input type="checkbox"/> A.M.	
			<input type="checkbox"/> P.M.	
CONTACT				
MEDIUM: <input type="checkbox"/> SOIL <input type="checkbox"/> WATER <input type="checkbox"/> ABSORBENT GRANULES Provide details:				
APPROXIMATE QUANTITY & DURATION:				
CIRCUMSTANCE / SOURCE / CAUSE OF DISCHARGE:				
POTENTIAL ADVERSE EFFECTS:				
RESPONSIBILITY / OWNER:				
WEATHER:	CLEAR CLOUDY	TEMP _____ °C <input type="checkbox"/> PRECIPITATION	WIND: _____ DIRECTION _____ SPEED	
INITIAL ACTION / WHO HAS BEEN CONTACTED:				
ASSISTANCE REQUESTED?				
CLEANUP COMPLETED:			DATE:	
			TIME:	A.M. P.M.
CLEANUP CONTRACTOR:				

CLEANUP METHODS:

AREA AFFECTED: SEE ATTACHED PLAN

% CLEANED UP:

ENVIRONMENT AFFECTED / ADVERSE EFFECTS:

PROPERTY DAMAGE:

WASTE HAULER:

MANIFEST / WAYBILL:

WASTE RECEIVER:

CLEANUP COST:

SUCCESS OF CONTAINMENT / CLEAN-UP EFFORTS / INTERNAL FOLLOW-UP:

PREVENTIVE MEASURES TO BE TAKEN:

Responsibility for implementation:

Targeted Deadline:

ADVISED OF CLEAN-UP (if required):

DATE:

TIME:

A.M.

P.M.

CONTACT:


REPORTED BY: _____

DATE: _____

Figure 1 -Site Plan



 Spill Kit

 Drains