

## **POLLUTION PREVENTION**

### **1.0 PURPOSE AND OBJECTIVES**

The main purpose and objective of the Pollution Prevention Plan is to manage substances and or activities that present a pollution risk and the objectives are:

1. Identify the personnel required to manage the substance and activities
2. Identify the activities/ materials to be managed
3. Identify the control measures to be implemented and the management practices.

### **2.0 SCOPE**

The plan applies to all construction activities and to all employees or visitors and contractors employed or working on the Corrib Pipeline Project.

### **3.0 RESPONSIBILITY**

#### **3.1.1 SEPIL Pipeline Construction Manager**

It will be the responsibility of SEPIL Pipeline Construction Manager in co-ordination with the SEPIL Environmental Officer to ensure that pollution prevention control measures are implemented and managed by the appointed Contractor at the work sites. It will also be the responsibility to ensure that control measure is in place by the Contractor to mitigate against a pollution incident.

#### **3.1.2 SEPIL Environmental Officer**

It is the responsibility of the SEPIL Environmental Officer to ensure that the appointed Contractors implement the required pollution prevention measures necessary. Also the Environmental Officer will ensure that the control measures which are utilized fit for purpose and adequately maintained to prevent a pollution incident. It is the Environmental Officers responsibility to inform the SEPIL Pipeline Construction Manager where a mal-function may have occurred in the system and plan implementation.

### **4.0 Management Control**

The following substances/activities have been identified to pose an environmental risk and control measures will be implemented to ensure that the risk of pollution is prevented:

1. Fuel Handling
2. Chemical Handling & Management
3. Plant Management

#### **4.1.1 Management Control- Fuel Handling**

- Deliveries shall be authorised by site management, be undertaken during daytime only and supervised by a designated person.
- The delivery area approaches and exits must be clear of obstructions for both vehicles and employees. Routes of transfer of material on-site shall also be identified so that any necessary protection can be incorporated.
- Receiving points shall be clearly marked with the appropriate product name.

- Loading and unloading areas shall be in designated, marked areas, alternatively isolated from surface water where practicable.
- Spill kits shall be available at all times.
- Checks shall be made that all valves are properly set so that during delivery no leaks can occur.
- Tanker deliveries shall be via a lockable fixed coupling within a bunded area or drip trays shall be used. After delivery all valves shall be properly closed and locked.
- Storage tanks shall typically be fitted with a contents indicator to prevent overfilling.
- Diesel Tanker drivers will be present during discharge - the operation shall not be left unattended.
- The driver must check bowser or equipment tanks contents prior to filling to ensure that there is sufficient space in the tank.
- The delivery quantity, date and time must be logged.
- Refillable bulk containers shall be stored and emptied in secure and bunded areas.
- All containers shall be firmly closed when not in use to prevent the possibility of leaks or ingress of rainwater.
- Drums, cans etc., must be properly maintained and handled correctly to avoid damage. Any drums, cans etc. which leak must be removed from site immediately.
- Fuel storage areas will be established on sites.
- Only required volumes of fuel will be stored on site. All main storage tanks will be bunded with a capacity of 110% of the largest tank and shall be sited on an impervious base as soon as is practicable. All storage tanks and/or bowsers shall be protected internally and externally against corrosion and shall be located where an external inspection for corrosion or leaks may be carried out. Where appropriate the bunds will be protected to prevent excess rainfall entering bunds.
- Should petrol be required on site appropriate storage containers will be used. Metal jerry cans only. Petrol will be stored in the bunded chemical cabinet at all times.
- All bunding shall be regularly examined during times of rainfall to ensure capacity is maintained.
- Bunds and drip trays shall be kept free of rubbish, debris and rainwater. They shall be monitored and emptied regularly.
- Valves and stopcocks on tanks and mobile bowsers shall be marked to show whether they are open or closed and kept locked shut when not in use.
- A designated person shall be responsible for signing out the keys and ensuring that they are closed at the end of the working period.
- The contents and volume of storage tanks, drums, bowsers and other containers shall be clearly marked.
- Handling and movement of all oils and fuels must be completed with due regard and full adherence to health and safety procedures.
- All appropriate Personal Protective Equipment must be worn when refuelling especially gloves and goggles.

#### **4.1.2 Management Control- Chemical Handling**

To ensure that appropriate materials are selected, , approval must be obtained from the Health and Safety Manager and the Environmental Officer prior to bringing on site chemicals / hazardous materials.

All chemicals or materials must be stored and managed in accordance with their material safety data sheets and disposed of in accordance with the waste management plan. Laboratory chemical, should as a minimum, be stored in the chemical closet.

Deliveries of chemical or materials must be authorised by Site Management, undertaken during working hours and supervised by designated personnel. All chemicals will be stored in the designated storage area. A list of chemicals present shall be maintained on the site at all times by the Environmental Officer and a copy held in the medical centre.

The storage area will be located:

- Away from sensitive receptors, away from groundwater borehole, a reasonable distance from a body of surface water, on level ground and an area of hard-standing.
- Clear of moving plant, machinery and vehicles
- Delivery area approaches and exits will be clear of obstructions
- When working with chemicals ensure sufficient spill kits will be available at all times.
- Any material with the potential to cause a negative environmental impact should be stored on a pallet in a bunded area, avoiding direct contact with the ground.
- Where possible materials with the potential to cause a negative environmental impact should be stored in a container structure on site
- All hazardous materials will be labeled and where required appropriate HAZCHEM, hazard and risk phrases will be attached in a weather proof label.
- All storage tanks and/or bowsers will be located where an external inspection for corrosion or leaks may be carried out.
- A lockable bunded chemical cabinet will be used for storing all chemicals. All bunding will be kept free of rubbish.
- All containers will be firmly closed when not in use to prevent the possibility of leaks or ingress of rainwater. Drums, cans etc., will be properly maintained and handled correctly to avoid damage.
- Any drums, cans etc. which leak must be removed from the site immediately.
- When using chemicals onsite, steps should be taken to ensure that containers cannot be knocked over, jostled or damaged.
- Upon completion of works or at the end of the working day chemicals should be returned to the chemical container for storage.
- Storage tanks shall typically be fitted with a contents indicator to prevent overfilling. to ensure that there is sufficient space in the tank.
- Refillable bulk containers shall be stored and emptied in secure and bunded areas.

#### **4.1.3 Management Control Plant Maintenance**

- Mobile plant will be CE certified, adequately maintained and in good condition with no leaks evident.
- A site inventory of mobile plant, service schedules and pollution incidents will be kept. If mobile plant is not removed from site for servicing, then adequate precautions will be taken to ensure that no spillage is possible during maintenance work such as the use of spill kits.
- Mobile plant will have internal drip trays fitted or located beneath if located in an environmentally sensitive area e.g. not on hard standing or close to surface drainage.

#### **4.1.4 Management Control- Sewage and Waste Water Disposal**

The construction site will be serviced by:

- Chemical toilets will be hired from a licensed contractor who will empty them on a regular basis and dispose of the waste to a suitably licensed facility.
- Toilet block will have an above ground holding tank which will be emptied on a regular basis by a licensed contractor and disposed of at a suitably licensed facility.

- All temporary facilities such as sinks and the canteen will be properly connected to an appropriate holding tank (as used for the toilet block). The tank will be emptied routinely by a permitted hauler, and the content disposed of at an appropriately licensed facility. The collection and disposal procedure is detailed in the Waste Management Plan.

## **EMERGENCY RESPONSE**

### **1.0 PURPOSE AND OBJECTIVES**

The main purpose and objectives of the Environmental Emergency Response Procedure in the event of a spill, an environmental incident resulting in pollution or any other environmental emergency are:

1. To identify the personnel required to take control of an environmental incident.
2. To maintain a state of preparedness to prevent or reduce negative impacts on the environment as a result of an environmental incident on the Corrib Pipeline Development.
3. To ensure factual and timely communications between SEPIL, DCENR, Mayo County Council, and DEHLG, NPWS, Main Contractors employees, and other relevant parties during an incident.

### **2.0 SCOPE**

This procedure applies to emergencies and environmental incidents as defined and described within this procedure.

This procedure applies to all employees, visitors and contractors employed or working on the Corrib Pipeline Project during the construction phase.

### **3.0 RESPONSIBILITY**

#### **3.1 SEPIL Pipeline Construction Manager**

In the event of a significant incident the SEPIL Pipeline Construction Manager is to be informed and kept up to date regarding the status of the incident. The SEPIL Pipeline Construction Manager, in conjunction with the Environmental Officer, will be responsible for liaising with the relevant authorities on all environmental issues arising.

#### **3.2 SEPIL Environmental Officer**

It is the responsibility of the Environmental Officer or his/her delegate to ensure that all new employees at induction of the Environmental Emergency Procedure.

It is the responsibility of the Environmental Officer to inform the Pipeline Construction Manager if there is any significant spillage or an environmentally impacting accident/incident on the site. The Environmental Officer will notify Mayo County Council, DCENR and DEHLG and any other relevant Authority (e.g. Inland Fisheries Ireland) by phone followed up in writing by fax or e-mail. The Environmental Officer must advise on limiting the environmental impact of the event and the mitigation measures adopted. Both the Environmental Officer and Pipeline Construction Manager will carry out any investigations required and write up the appropriate accident/incident report. In the event of impacts on a designated conservation site (other than by permitted construction activities) or to a protected species, the Project Ecologist will be informed and remedial action will

be instigated. NPWS will be notified by phone. This will be followed up by a written account of the details of the incident when available.

### **3.3 Emergency Spill Response Team (ESRT)**

The Emergency Spill Response Team (ESRT) is a team that will be assembled for the construction phase. The purpose of the ESRT is to deal with any major spill that may occur on site. The team deals with potential spill scenarios that may occur on site. Training for the team members occurs on an ongoing basis. The team is trained on how to correctly deal with a spill and preventive mitigation measures that may occur on site should a significant spill take place.

### **3.4 All Personnel**

All Site Personnel are required to report any environmental incident immediately to their Supervisor or the Environmental Officer.

## **4.0 DEFINITIONS**

<b>Emergency</b>	An unplanned event/incident requiring containment/action following an environmental incident which could, due to its scale, significantly affect site and/or personnel and/or the environment.
<b>Environmental Incident</b>	Any occurrence which has potential, due to its scale and nature, to migrate from source and have an impact beyond the site boundary.  An Incident Review Committee, comprising the Environmental Officer and Pipeline Construction Manager will be formed to agree on the classification of any non clear cut incidents.
<b>Environmental Exceedance Event</b>	In the case of surface water an exceedance event occurs when the defined number of flow proportional samples collected in accordance with the look up tables exceed the upper tier values as outlined in the Environmental Monitoring Programme, Appendix A of the EMP. The look up tables indicate compliance requirements on a rolling average in relation to accredited laboratory results yielded.  Where noise, vibration, dust and lighting results exceed assigned limits as outlined in the Environmental Monitoring Programme in accordance with conditions set out by An Bord Pleanála, DCENR and DEHLG.

## **5.0 REFERENCE DOCUMENTATION**

- Environmental Monitoring Programme and Appendices

## **6.0 MATERIALS**

Spill Response kits are stored in the on-site stores and at strategic locations within the pipeline temporary working area and at the construction compounds for use in the event of a spillage, environmental incident or emergency situation. Spill kits for immediate use will be kept in the cab of mobile equipment. Spill kits will have suitable spill control materials to deal with the type of spillage that may occur in water or land.

A typical oil kit will include the following;

- Double density Oildri pads
- Double density Oildri socks
- Oildri granules
- Oildri spill recovery bags
- Red and white barrier tape/chain
- Rubber gloves
- Safety goggles
- Spill safety instruction document
- Slikstopper/Drain Blocker
- Spill Barrier
- Shovels

A typical Acid kit will include the following;

- Neutraliser
- Wellingtons
- Chemical Suit
- Red and white barrier tape/chain
- Spill recovery bags
- Chemical Gloves
- Goggles/Face protector
- Double density Oildri pads
- Double density Oildri socks
- Spill Safety Instruction document

Track mats, drain covers and geo-textile covers may also be used.

This equipment is inspected regularly and restocked as required. Any instances where spill materials have been used without any spillage being reported in a certain area will be investigated. The spill kit locations will be reviewed as required.

### **6.1 The On Site Chemical Storage Container**

The onsite chemical spill container is located at relevant compounds. Members of the onsite Spill Response Team and the environmental department can access the container. The container contains extra spill kit equipment in the case of a large spill on site.

## 7.0 PROCEDURE

### 7.1 General

- If an environmental incident is identified then it should be reported to the Supervisor or line report and thereafter the Pipeline Construction Manager and Environmental Officer should be contacted to inform him/her of the incident, giving details about:
  - Location of the emergency;
  - Scale of the emergency
  - Nature of the emergency and any specific dangers;
  - Remedial actions taken
  - Name and who they work for
  - Other relevant details
- As soon as the Environmental Officer becomes aware of the incident they must immediately inform the Pipeline Construction Manager who will assess the situation and establish what regulatory reporting is required.
- If required the Pipeline Construction Manager must appoint a supervisor to take control of the scene of the incident or mobilise the site response team. Under any other condition the relevant contractor takes charge of the spill.
- The initial remedial efforts will be aimed towards containing and controlling the scene of the incident to prevent the release or migration of any materials from the source and, as far as possible, eliminating the source if safe to do so. People working in the vicinity of the area should be alerted of potential danger associated with the spill. The spill scene should be barriered off and inspected by a member of the ESRT team. Photographs should also be taken. The Environmental Officer will decide if it is necessary to mobilise the ESRT team. If the team are mobilised then the spill scene is handed over to the ESRT team leader who will report to the Environmental Officer.
- The Environmental Officer will ensure, if applicable, that the incident details are communicated to the relevant regulatory authorities, initially by phone and followed up as soon as is practicable by Email. The Email will include a report providing details of the emergency and what actions were taken. A copy of the Environmental Incident / Exceedance Report Form to be issued is shown in Appendix B. A schematic of the overall incident response is outlined in Figure No.1 Further measures as they apply to specific types of incidents and occurrences are outlined in the following sections.

### 7.2 Oil/Diesel or Chemical Spill

The following measures, depending on the nature of the incident, will be taken:

- The source of the spill will be identified and, where possible, immediately stopped;
- If a container is damaged and the spill cannot be stopped then the contents will be transferred to another container;
- If the spill is small then absorbent material will be used to remove the spill. The used absorbent material will be put in sealed bags/containers and disposed of to an appropriately licensed hazardous waste contractor; in accordance with the Waste Management Plan and other relevant procedures. Such spills will generally be recorded as Environmental Near Miss Occurrences in accordance with the Environmental Management Plan.
- If the spill is more significant then spill containment booms will be put in place to stop the further spread of material and then absorbent material will be used to remove the spill. The used absorbent material will be placed in sealed bags/containers and disposed of to an

appropriately licensed hazardous waste contractor in accordance with the Waste Management Plan and Procedures;

- If the spill is in to a body of surface water where possible the oil should be contained using an oil spill boom and the oil removed using absorbent pads.
- If a spill is onto peat/soil then the contaminated peat/soil will be excavated and disposed of in accordance with the provisions of the Waste Management Plan and other relevant procedures.
- If the spill is considered to be significant the Pipeline Construction Manager will be informed of the status and provided with the details of the incident and the programme of mitigation be put in place to manage the incident.
- A programme of monitoring may be initiated to assess the impact of the spill on the environment and the results made available to all interested parties;
- Where possible preventative and corrective action measures will be put in place to ensure that a similar event does not happen again.

### **7.3 Damage to a Designated Conservation Site**

The Corrib Onshore Pipeline will be constructed at some locations which are subject to designation under the EU Habitats and Birds Directives, i.e. the Glenamoy Bog Complex candidate Special Area of Conservation (cSAC) and the Blacksod Bay /Broadhaven proposed Special Protection Area (pSPA) respectively.

In the event of impacts on a designated site, other than by means of permitted construction activities, the following measures must be taken:

- The Environmental Officer will inform the Project Ecologist as to the nature, extent and location of the incident;
- NPWS will be informed of the incident;
- The cause of the incident will be identified;
- If an accident involving site vehicles/personnel caused the incident then all action will be postponed until such time as the Health and Safety Officer on the site considers the location/works area safe.
- Once the location/works area is secure an assessment of the nature of the incident will be carried out;
- If the damage is considered to be significant the Pipeline Construction Manager and, in consultation with the Project Ecologist, will advise the supervisor on the measures to be taken at the scene, after consultation with NPWS if necessary;
- An investigation comprising a photographic record, interviews with relevant personnel and a survey around the area may be initiated, and results are to be reported to the Environmental Officer and the Project Ecologist. Specialist ecological surveys of the affected area may be required.
- Other regulatory authorities such as Mayo County Council, DCENR and DEHLG will be informed.
- Where possible preventative and corrective action measures will be put in place to ensure that a similar event does not happen again.

### **7.4 Unauthorised Waste Management**



- All waste generated on site must be transported by a correctly permitted waste carrier and treated/disposed of at a licensed/permitted waste facility in accordance with the project
- Waste Management Plan;
- The waste management contractors for the site may be audited for environmental due diligence purposes to ensure that the site carries no potential waste management liabilities;
- Under no circumstances can waste be burnt on-site;
- If waste is not managed as defined above then this is considered unauthorised waste management and must be stopped;
- If waste is dumped on site or in land adjacent to the site this will also be considered unauthorised waste management and the cause and impact of this event will be assessed;
- If the incident is considered to be significant the Pipeline Construction Manager will be contacted and provided with the details of the incident and the programme of mitigation to be put in place to manage the incident. The Pipeline Construction Manager will inform Environmental Officer who will notify the relevant regulatory authorities (Mayo County Council, DCENR, DEHLG).
- Where possible preventative and corrective action measures will be put in place to ensure that a similar event does not happen again.

## **7.5 Death or injury to a protected species**

In the event of an incident resulting in the death of injury or disturbance to protected species, or damage to their breeding/resting places, the following procedures must be followed:

- The Pipeline Construction Manager will immediately report the matter the Environmental Officer who will inform the Project Ecologist as to the nature, extent and location of the incident;
- NPWS will be informed In the case of death of, or injury to a protected species.
- The cause of the incident will be identified;
- Details will be logged in the Wildlife Log and will include the following information: species details, nature of the injury / damage / disturbance, measurements of the carcass (in the case of a death) etc. Photographs will be taken and all details will be sent to the Project Ecologist;
- In the case of a death, the carcass will be kept for examination by specialists;
- In the event of damage to the resting place of a protected species (badger sett/ otter holt), the area will be cordoned off in accordance with the protocols for the particular species and works will cease in the area pending a full assessment by specialists;
- In the case of injury to a protected species, the Pipeline Construction Manager will be advised as to what measures should be taken;
- If an accident involving site vehicles/personnel caused the incident then all works will be postponed until such time the Health and Safety Officer on the site considers the location and work safe;
- Depending upon the scale of the incident the Pipeline Construction Manager may assign a supervisor to manage the incident scene and take the appropriate measures;
- The Environmental Officer and Project Ecologist will take responsibility for regulatory reporting as described above;
- An investigation comprising photographic surveying, interviewing relevant personnel and a survey of the area may be initiated and results are to be reported to the Environmental Officer and the Project Ecologist;
- Where possible preventative and corrective action measures will be put in place to ensure that a similar event does not happen again.

## **7.6 Bentonite Release**

- In the unlikely event of bentonite release during tunnelling the bentonite operating pressure will be reduced immediately to reduce bentonite loss. Immediate actions will be initialised to identify and eliminate the cause of the problem.
- The TBM speed will be altered to move out of the area where there is bentonite loss.
- In the unlikely event of a bentonite release the design and operation of the TBM will limit the volume to 7m<sup>3</sup>.
- Regulatory authorities such as Mayo County Council, DCENR and DEHLG will be informed.

## **7.7 Limit Exceedance**

- The source of the occurrence will be identified and initial mitigation measures installed to cut off the source;
- Section 4 of this document defines what an exceedance event is. The Environmental Officer will take responsibility for regulatory reporting of exceedance events. All incidents will be reported to Mayo County Council, DCENR, and the DEHLG and depending on the nature of the incident will also be reported to the IFI, the Project Monitoring Committee and the Consent Conditions Monitoring Committee as necessary. Reporting to Mayo County Council will involve a telephone initially as soon as the exceedance becomes known and thereafter an Email with a report (See Appendix B) providing details of the exceedance.
- A programme of localised additional monitoring will be initiated if required to assess the impact of the exceedance on the external receiving environment and the results made available to all interested parties;
- Where possible preventative and corrective action measures will be put in place to ensure that a similar event does not happen again.

**Appendix A - Environmental Incident / Exceedance Form**  
**Environmental Notification**

<b>Date:</b>	<b>Time</b>	
<b>Comments</b>		
<b>Further Actions</b>		
<b>Issued to:</b>	<b>Date:</b>	<b>Time:</b>
<b>SIGNED:</b>	<b>DATE:</b>	

**Appendix B**  
**Fountain Incident Report Form**

**Incident No:**

**Fountain Incident  
No:**

**Short Description:**

**Root Cause:**

**Event Type:** Drill/Exercise

Incident  
Consequences

with

Near Miss

Potential Incident

Product Quality Incident

Third Party

**Responsible  
Supervisor:**

**Responsible  
Contractor:**

**High Value Learning:**

Not review LFI

Review LFI

**Location:**

|

|

|

**Date Occurred:**

**Time of Incident:**

**Reported By:**

**To Whom:**

**Incident Description**

**Immediate Corrective Actions Taken:**

**Weather:**

**Lighting Conditions:**

**Contractor Involvement:**

**Damage or Loss of Materials/Equipment:** Yes  No

**Environmental Impact:** Yes  No

**Does the Incident warrant a Serious Incident Investigation:** Yes  No

**Have Photographs been taken:** Yes  No

**Have Witness statements being taken:** Yes  No

**Risk Assessment:**  
**Actual Severity:**

**Potential Risk Rating:**

**Was First Aid Given?** **Not Applicable** Yes  No

**Injury Type:**

**Body Part:**

**Action Items:**

**Target Date:**

1)

2)

3)

4)

5)

**Contractor Supervisor**

**Signed:**

**Date:**

**Incident Closed: Advisor**

**Signed:**

**Date:**

