

1. Purpose

The purpose of this document is to set out the minimum requirements of the Environmental Protection Agency (EPA) for Accident Prevention Procedures (APP), Emergency Response Procedures (ERP), and their linkage to incident notification.

2. Introduction

The requirement to put in place and maintain an Accident Prevention Procedure (APP) and an Emergency Response Procedure (ERP) is a condition in most licences or authorisations issued by the EPA. Licence holders are reminded of their obligations under these conditions and should ensure compliance as required.

The purpose of the conditions is to ensure that incidents and accidents with the potential for adverse environmental impact are prevented, or their impact minimised. The procedures should ensure that incidents and accidents are managed and notified appropriately. EPA Guidance on incident notification, management and communication is available for download at:

<http://www.epa.ie/pubs/advice/licensee/guidancetolicenseesonthenotificationmanagementandcommunicationofenvir.html>

The APP and ERP should be site specific and may consist of a single document each or a series of linked documents.

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3. Requirements of an Accident Prevention Procedure (APP)

The APP licence condition typically requires that:

“The licensee shall maintain a documented Accident Prevention Procedure which addresses the hazards on-site, particularly in relation to the prevention of accidents with a possible impact on the environment. This procedure shall be reviewed annually and updated as necessary”.

As a minimum the Agency requires that:

- The APP shall identify all hazards and risks on site and ensure the necessary measures are taken to prevent accidents with a possible adverse impact on the environment and to limit their consequences when accidents do occur.
- The licensee should consult, where applicable, information contained in any Environmental Impact Statements for the facility, information relevant to the application of the Seveso directive, historical events and any other relevant information when identifying possible accidents which may occur on site.
- Any accidents/incidents that do occur on site should be fully investigated. The investigation should include the following:
 - Documentation of what occurred
 - The root cause of the event
 - A summary of the response actions taken
 - A summary of the impact on the environment
 - Identification of lessons regarding prevention of reoccurrence and in terms of response to future events.
 - The APP should be reviewed after any accident/incident to ensure it is still fit for purpose.
- In the event that an emergency situation or accident is also a notifiable incident the licence holder must ensure that the conditions of their licence are complied with and should refer to the Agency’s guidance on incident notification, management and communication.
- The APP must be documented, maintained and available for review at all reasonable times. If the APP is covered by multiple documents an overarching/overview procedure shall be provided.
- The APP shall be reviewed as necessary and at least annually; this may be a licence requirement. The licensee shall document that the review has occurred. The review should take into consideration the learning or corrective actions identified from any accidents which occurred since the previous review.

- All relevant staff shall be trained on the procedure at appropriate intervals (at least once per annum) and records of training of staff must be maintained and available for review.

4. Requirements of an Emergency Response Procedure

The ERP licence condition typically requires that:

“The licensee shall maintain a documented Emergency Response Procedure, which shall address any emergency situation, which may originate on-site. This procedure shall include provision for minimising the effects of any emergency on the environment. This procedure shall be reviewed annually and updated as necessary”

As a minimum the EPA requires that:

- A risk assessment or scoping exercise should be carried out to ensure that all potential emergency situations are addressed. Where relevant, it should include information relevant to External Emergency Plans for Seveso sites. The ERP must address all emergency situations (e.g. fire, gas leak, explosion, chemical spill, fuel spill, flood) that could arise on-site, including any consequential effects or impacts. It is not acceptable to cover just one or two emergency scenarios.
- The ERP shall provide for the minimisation of the effects of any emergency on the environment. It must outline the actions that will be taken and the personnel responsible. If required it can link to other documents associated with incident or emergency response.
- The licensee shall ensure that any actions required to mitigate the impacts of the emergency can be undertaken safely in the event of an emergency situation/site evacuation (e.g. access to shut-off valves on drains or switch off power supply).
- The ERP must detail how emergency scenarios occurring out of normal hours of operation will be detected, appropriately dealt with and communicated to the EPA, other regulatory bodies and the public if necessary.
- Any external bodies (including the emergency services) that may be needed to support the emergency response should be identified in the ERP. Best practice would include advising/consulting these external bodies on what is expected of them and providing information to them on what they may be facing. There should be arrangements in place for coordination of the response where multiple organisations will be involved and as a minimum, identification of who is in charge.

- There may be a requirement for carrying out mock exercises of the ERP for more complex plans/sites. This will allow for an assessment of how the emergency is dealt with, how coordination works, how the procedures work together and will get decision makers and relevant bodies engaged.
- The ERP should provide for the assessment of the off-site impact on the environment/public during the emergency response and should include arrangements for undertaking this preliminary assessment and sharing of the resulting information with the relevant bodies such as emergency services, EPA and any other agencies to ensure a coordinated response.
- The ERP must include the requirement to notify the Agency and other relevant bodies as required by the licence. The procedure shall meet the current Agency guidance on notification, management and communication of incidents i.e.
 - Notification is required by telephone **and** via the EDEN portal
 - Notification via EDEN has replaced the requirement to report by fax or e-mail.

Please refer to EPA Guidance to Licensees/COA holders on the Notification, Management and Communication of Environmental Incidents which is available at <http://www.epa.ie/pubs/advice/licensee/Guidance%20to%20licensees.pdf>.

Details of what must be notified are outlined in Annex 1 of the above document, i.e. Incident Notification Form.

- The ERP must be available at locations where it can be accessed and removed from the site in an emergency situation where evacuation of the site is required. Storage of a copy off-site should also be considered
- The ERP must be documented, maintained and available for review at all reasonable times.
- If the ERP is covered by multiple documents an overview procedure should be provided.
- The ERP should be reviewed as necessary and at least annually; this may be a licence requirement. The licensee shall document that the review has occurred. The review should take into consideration the learning or corrective actions identified from any incidents or emergencies which have occurred since the previous review.
- All relevant staff shall be trained on the procedure at appropriate intervals (at least once per annum) and records of training of staff on the procedure must be maintained and be available for review. It may be useful to carry out exercises of the ERP.

The Agency considers it best practice for the ERP to include:

- An up to date chemical, product and waste inventory and associated Material Safety Data Sheets. Combustible and hazardous materials should be clearly identified. Where available, likely burn times of materials should be included.
- An inventory of all incident response and pollution prevention equipment available on site, including for example, spill kit material, booms, the location of water supply hydrants, sampling equipment, Personal Protective Equipment, etc.
- A site plan identifying the location of all incident response and pollution prevention equipment, including Personal Protective Equipment. The plan should also show main access routes for emergency services.
- Details of the numbers and types of heavy plant/machinery and operators on-site to assist with initial fire breaks or other types of emergency response.
- A site plan(s) showing all drains (process, surface water and foul), waste storage areas and chemical or material storage areas.
- A procedure (or a link to the procedure) for disposal of fire water/contaminated water that may arise during an emergency.
- Communication arrangements, e.g. named contacts/key holders and telephone numbers as well as details of how staff and senior management will be alerted of an emergency, including during out of normal office hours.
- Health and safety information such as Personal Protective Equipment (PPE) requirements.

5. Document Control

The Agency considers it best practice for the licensee to ensure that both the ERP and APP:

- Are appropriate to the risk posed by the facility
- Are clearly documented with revision numbers
- Clearly assign responsibilities to specific roles
- Are signed by the senior site manager or director
- Are readily available and explained to all staff
- Include current internal and external contacts including emergency contact numbers.

6. Incident notification, management and communication

The ERP and APP must link to the site incident notification, management and communication procedure. In the event that an emergency situation or accident is also a notifiable incident the licence holder must ensure that the conditions of their licence are complied with and should refer to the Agency's guidance on incident notification, management and communication.

7. References/ Further reading:

Environmental Protection Agency: Guidance to Licensees/Certification of Registration Holders on the Notification, Management and Communication of Environmental Incidents; www.epa.ie

Environmental Protection Agency: IPPC Guidance Note on Storage and Transfer of Materials for Scheduled Activities; www.epa.ie

Environmental Protection Agency: (Draft) Guidance Note to Industry on the Requirements for Fire-Water Retention Facilities; www.epa.ie

Environmental Protection Agency: Guidance Document on Environmental Liability Regulation for operators, regulatory authorities and the public; www.epa.ie

NIEA/SEPA/Environment Agency: Pollution Prevention Guidelines – Incident Response Planning: PPG 21