



# Operational Safety Instruction

## Pollution Prevention

02<sup>nd</sup> June 2017

ASEnv\_OSI\_056

v1.0

It is the responsibility of all employers to ensure that relevant OSIs are brought to the attention of their staff. However, individuals remain responsible for their own actions and those who are in any doubt should consult their Supervisor or Manager.

### 1. Introduction

**1.1** The purpose of this Instruction is to advise and remind all airport companies of;

**1.1.1** The airport byelaws and requirements for environmental pollution prevention.

**1.1.2** Their responsibilities to prevent, wherever possible, pollution to land, groundwater and receiving water courses and to ensure compliance with permits, licenses and consents.

**1.1.3** Their duty to enable a prompt and effective response to all incidents that occur at Heathrow which are, or could be harmful to the environment.

**1.2** This Instruction should be read in conjunction with the OSI ASEnv\_OSI\_059 Airside Environment Incident Reporting Procedures.

**1.3** This OSI replaces OSI/24/12 which is now cancelled.

### 2. Definitions

There are no definitions applicable for this Operational Safety Instruction

### 3. Safety Procedure

#### 3.1 General

**3.1.1** Heathrow is committed to minimising the impact of its business on the environment and local communities, by acting responsibly and continuously improving its environmental performance.



**3.1.2** Airports are subject to a number of environmental controls in common with other major industries. Minimising pollution from routine operations or emergency situations is an essential operating requirement of all airline/operating companies.

**3.1.3** The emphasis rests firmly on the avoidance and minimisation of risk, and all practical steps should be taken to prevent pollution by means of training, awareness of legislation, good maintenance of equipment and good working practices.

**3.1.4** Companies operating at Heathrow should be aware of and have regard for the following documents (and any subsequent amendments) relating to the environmental pollution practice;

**3.1.4.1** OSI ASEnv\_OSI\_059 Airside Environment Incident Reporting

**3.1.4.2** OSI ASEnv\_OSI\_057 De/Anti-Icing Fluid Management Reporting Procedures

**3.1.4.3** OSI ASGrOps\_OSI\_019 Fuelling of Aircraft

**3.1.4.4** OSI ASEnv\_OSI\_061 Disposal of Pollutants, Oils and Lubricants and other Hazardous Waste

**3.1.4.5** OSI ASEnv\_OSI\_058 Waste Management and Disposal including Aircraft Catering Waste

## 3.2 Polluter Pays

**3.2.1** It has become an established principle of Environmental Law that when cleaning up the consequences of a pollution incident 'The Polluter Pays'. In all cases this principle will be applied at Heathrow.

**3.2.2** Where facilities are provided by Heathrow, the user must ensure they are used correctly. Examples include but are not limited to;

**3.2.2.1** Waste compactors

**3.2.2.2** Battery charging points

**3.2.2.3** Vehicle and aircraft washing areas

**3.2.2.4** Sanitation blocks

**3.2.3** Failure to use these areas correctly will result in any costs associated being charged to the airline/operating company and possible prohibition of use of facilities in future.



**3.2.4** All airline/operating companies shall ensure that they implement controls in accordance with the Environmental Agency's guidance of best practice. Further information can be found at <http://www.netregs.gov.uk/>

### 3.3 Sanitation Blocks

**3.3.1** The sanitation blocks are for the disposal of aircraft toilet waste only.

**3.3.2** Companies using the sanitation blocks must only discharge their waste over the drain aperture.

**3.3.3** Any waste not completely contained within the drain must be washed down with the supplied water hose.

### 3.4 Surface Water

**3.4.1** Only rainwater that has runs off from roofs and uncontaminated surface areas (and de/anti-icer used for safety requirements) are allowed to drain to open water (rivers, streams, lakes) via the surface water drainage system. In order to remain compliant with the consents, Heathrow has in place strict controls over activities, which are monitored and reported.

**3.4.2** All airline/operating companies are required to have appropriate controls in place to ensure they are complaint with all environmental legislation and Heathrow procedures, minimising all waste as far as possible. Areas to be considered include, but are not limited to;

**3.4.2.1** Above ground chemical and oil storage tanks, drums, bowsers and bulk containers

**3.4.2.2** Below ground chemical and oil storage

**3.4.2.3** Disposal of waste liquids including chemicals and oil

**3.4.2.4** Prevention and mitigation of spillages

**3.4.2.5** Aircraft (wet/dry) and vehicle washing and maintenance

**3.4.2.6** De-watering and construction run-off

**3.4.2.7** Anti/De-icing

**3.4.2.8** Waste storage areas and compactors



### 3.5 Foul Drainage System

**3.5.1** Effluent unsuitable for discharge to the environment should not be discharged to Thames Water Utilities PLC treatment plants. This includes, but is not limited to, effluent from cleaning operations, water contaminated with oils, greases, chemicals, solids and food waste.

**3.5.2** Vehicle and aircraft wet/dry washing & maintenance activities must only take place in designated areas. For details of designated areas or to inform Heathrow of planned sites, prior to use, contact the Airside Environment Manager on 07900 307 697.

### 3.6 Land

**3.6.1** Release of liquid through spill or leaks onto unmade ground (soil or grass areas) will cause contamination to the land and possibly the groundwater.

**3.6.2** Any intrusive ground works carried out must be approved through the appropriate Heathrow Property contact and include a qualified professional assessment of land quality. This may require remediation if advised.

### 3.7 Incident Response

**3.7.1** An incident is defined as an event, condition or behaviour which has or could have resulted in harm, loss or damage to the environment. This includes but is not limited to;

**3.7.1.1** Spills of liquids (e.g. milk, alcohol, sewage) or chemicals (acids, alkalis, detergents, aviation fuel, petrochemicals etc.)

**3.7.1.2** Release of gaseous pollutants

**3.7.1.3** Fly-tipping and incorrect segregation of wastes

**3.7.1.4** Emissions of noise, dust, smoke, odour, light or vibrations in excess of agreed or acceptable limits

**3.7.1.5** Breaches of environmental permits, license and consents

**3.7.1.6** In the event of an environmental incident please refer to OSI  
ASEnv\_OSI\_059 Airside Environment Incident Reporting Procedures



**3.7.2** It is a requirement, that all companies operating Airside ensure they have an appropriate mitigation in place for spills. This includes spill kits and clean up procedures for the materials and chemicals they use. Training to staff in their use and awareness of OSI AEnv\_OSI\_059 Airside Environment Incident Reporting Procedures is also required.

### 3.8 Enquiries

**3.8.1** Any questions regarding the contents of this Instruction or the subject matter in general should be referred to the Heathrow Airside Environment Manager on 07900 307 697 or the Airside Environment Advisor on 07702 998 575.

## 4. References

AEnv\_OSI\_059 Airside Environment Incident Reporting Procedures

AEnv\_OSI\_057 De/Anti-Icing Fluid Management Reporting Procedures

ASGrOps\_OSI\_019 Fuelling of Aircraft

AEnv\_OSI\_061 Disposal of Pollutants, Oils and Lubricants and other Hazardous Waste

AEnv\_OSI\_058 Waste Management and Disposal including Aircraft Catering Waste

[www.netregs.gov.uk](http://www.netregs.gov.uk)

