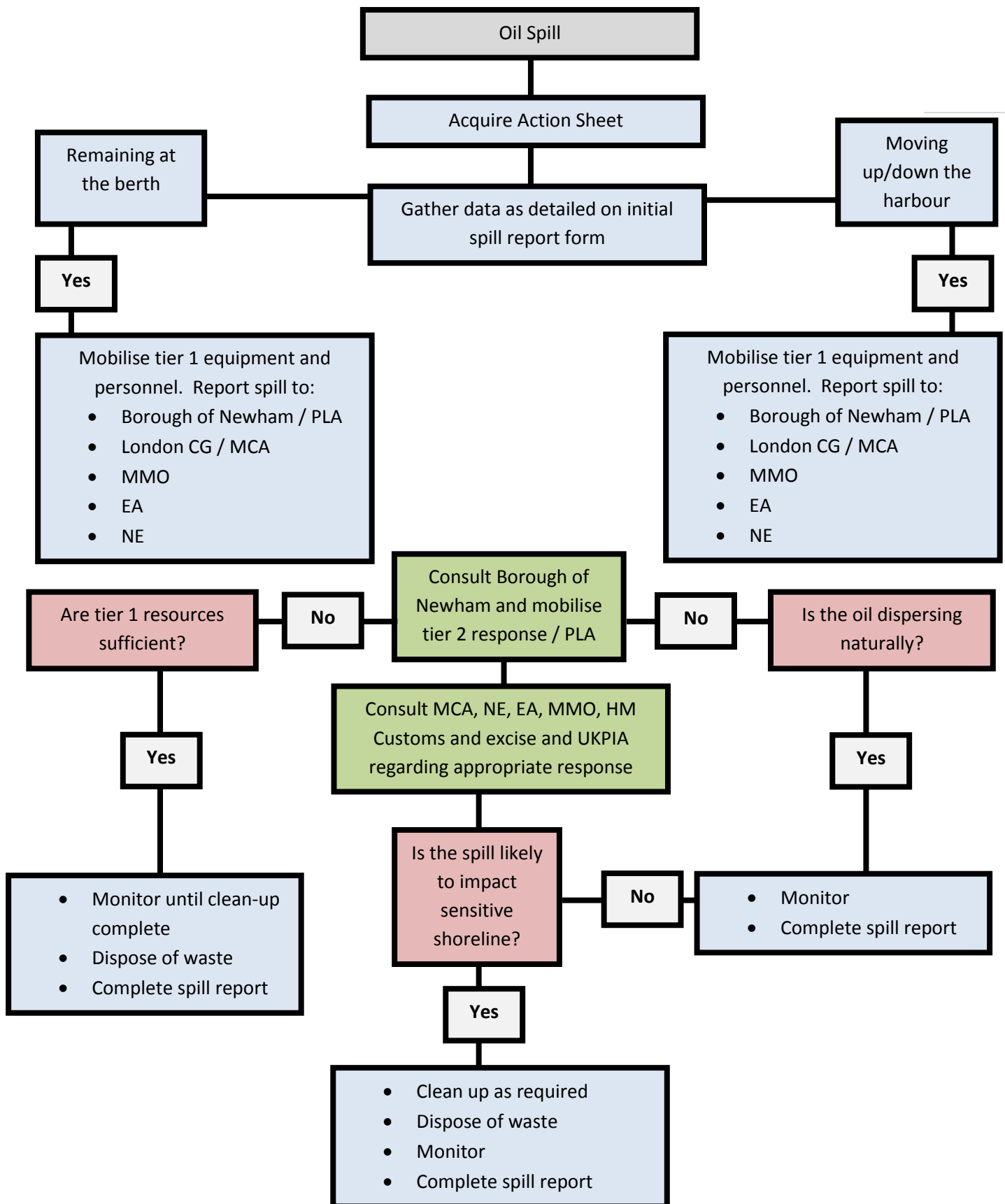


RoDMA General Manager		
No	Action	Refer to
1	Obtain all available information regarding the spillage and ensure that an Incident Log has been started.	Incident log sheet section 8.1 - 8.2
2	Go to spill site to confirm the spill quantity and determine the initial level of manpower and equipment resource mobilisation required.	Tiered response Section 4.2 & 11
3	Attempt to contain the oil.	
4	Report the spill to the Borough of Newham, EA and NE.	
5	Contact London CG / MCA to inform them of spill in accordance with the notification matrix and inform them that the POLREP will follow in due course.	Statutory notification section 6.1 & 8.1
6	Fill in the POLREP Report Form and forward to MCA London CG for submission to statutory bodies.	POLREP Report form section 8.1
7	Call-out additional response personnel ensuring appropriate PPE is available.	
8	Ensure that a sample of spilt oil is taken, especially when the origin of the spill is unknown or legal proceedings are liable to be taken.	MCA STOp Notice 4/2001
9	Constantly monitor situation.	
Tier 2 and 3 Incidents		
10	Inform Borough of Newham, EA and NE of decision to mobilise Tier 2 response contractor.	
11	Set up Marine Response Centre (MRC) / Shoreline Response Centre (SRC) as appropriate. <i>N.B. A MRC would be set up by the MCA to deal with an oil spill which has occurred offshore, while the SRC would be set up to deal with an oil spill which has/may reach land.</i>	
12	Contact oil spill response contractor and agree primary level of response required.	Resources directory section 11
13	Start and maintain an accurate log of all communications with the oil spill response contractor.	
14	Establish communication link with the oil spill response contractor duty manager and issue a call back number.	
15	Determine extent of incident in terms of: • Casualties • Safety hazards • Damage to facilities • Pollution extent	

	• Result of any action taken so far	
16	Brief oil spill response contractor site supervisor of actions as appropriate.	
17	Establish review/planning meetings. Continue normal communications and ad-hoc reporting.	
18	When incident stood down, confirm incident closure with all agencies involved.	
19	Complete incident log and ensure receipt of report from response supervisor.	



Company / body name	Contact	Telephone (office hours)	Telephone (out of hours)	Email
MMO	Spill Response	0300 2002024	0300 2002024 Mon - Fri 24 Duty Officer - 07770 977825	dispersants@marinemanagement.org.uk Daytime enquiries (not incident) Bernie Christie 0191 3762519
Borough of Newham				Switchboard: 020 8552 9587
EA	Emergency	0800 163300	0800 163300	ics@environment-agency.gov.uk
HM Revenue & Customs (HMRC)	Main National Co-ordination Unit Advice Line	08707 853600	08707 853600	ncu@hmrc.gsi.gov.uk
RoDMA	MD Ops Manager Marine Team Security 24 Hrs	020 7511 5086 07788 454841 07788 454842 07788 454843 07720 636902	07971 617262 07711 300132 07788 454841 07788 454842 07788 454843 07720 636902	Mike Luddy Scott Derben Trevor Boreham Steve Gilbert Mick Pace
London City Airport	Airport Duty Manager	020 7646 0241	More to add	
PLA	Thames Barrier PLA Harbour Master TOSCA Duty Controller	020 8855 0315 020 7743 7900 020 7743 7946 01474 560311 01474 562215	01474 560311 01474 562215	resilience@pla.co.uk
Vacuum Tanker	Cleanaway Domestic waste Thames tank cleaning services	020 7223 8393 01707 651982 01708 891313	020 7538 4526	
Skip hire	Skip in time	020 7511 912		
MCA / London CG		020 8312 7380	020 8312 7380	zone12@hmcg.gov.uk
MCA Southampton	Counter Pollution Salvage Officer – Andrew Healy	02038172485 Office hours only	Contact as above 020 8312 7380	andrew.Healy@mcga.gov.uk
Natural England	Duty Officer Marine Incident Emergency Contact	03000 601200/1316		marineincidents@naturalengland.org.uk

Police	North Woolwich	020 7474 1212	999	
Spill response contactor Tier 2				
Adler and Allan	24 hour emergency line	0800 592827	0800 592827	n/a

**LONDON'S ROYAL DOCKS***COME to LIFE*

King George V Lock | Pierhead | Woolwich Manor Way | London | E16 2NJ

RoDMA

Oil Spill Contingency Plan

June 2018

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RoDMA Assistant Manager	2 (CD copy)
RoDMA Marine Control	3 (CD copy)
London Borough of Newham	4 (CD copy)
London Coastguard	5 (CD copy)
MCA CPSO	6 (CD copy)
Natural England (NE)	7 (CD copy)
Environment Agency (EA)	8 (CD copy)
Marine Management Organisation (MMO)	9 (CD copy)
Port of London Authority (PLA)	11 (CD copy)
Adler & Allan	12 (CD copy)
Emergency Planning College Library	13 (CD copy)

Revision Page: Issued March 2013				
Section No.	Remove Pages	Insert Pages	Date Amended	Copy No.
Entire Plan	All	All	August 2013	Controlled copy
			November 2014	Controlled copy

MCA Letter of Approval

Statements from Consultees

Statements from Consultees

Glossary	
A+A	Adler and Allan
BPEO	Best Practical Environmental Option
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
EA	Environment Agency
HFO	Heavy Fuel Oil
HMR&C	Her Majesty's Revenue and Customs
HWS	High Water Springs
IMO	International Maritime Organisation
JNCC	Joint Nature Conservation Committee
LA	Local Authority
LBN	London Borough of Newham
LFO	Light Fuel Oil
LRF	Local Resilience Forum
LWS	Low Water Springs
MCA	Maritime and Coastguard Agency
MFO	Medium Fuel Oil
MGO	Marine Gas Oil
MMO	Marine Management Organisation
MRC	Marine Response Centre
MRCC	Maritime Rescue Co-ordination Centre
MRSC	Maritime Rescue Sub-Centre
NCP	National Contingency Plan
NE	Natural England
OPRC	Oil Pollution Preparedness Response and Co-operation Convention
OSCP	Oil Spill Contingency Plan
PLA	Port of London Authority
POB	Persons On Board
RoDMA	Royal Docks Management Authority

SAC	Special Area of Conservation
SCU	Salvage Control Unit
SOSREP	Secretary of State Representative
SPA	Special Protection Area
SRC	Shoreline Response Centre
SSSI	Site of Special Scientific Interest
UKBAP	United Kingdom Biodiversity Action Plan
UKPIA	United Kingdom Petroleum Industry Association

Part 1: Strategy

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Section 1: Introduction and Policy

1.1 Purpose of the Plan

This Oil Spill Contingency Plan is designed to guide RoDMA response personnel through the processes required to manage an oil spill originating from operations within or approaching their Dock under their jurisdiction.

The requirement to have an Oil Spill Contingency Plan for Harbours, Ports and Oil Handling Terminals around UK waters has been formalised by the Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998, which implement the International Convention on Oil Pollution Preparedness, Response and Co-operation, 1990 (OPRC, 1990). This Convention, adopted by the International Maritime Organisation (IMO) is aimed to “mitigate the consequences of major oil pollution incidents involving, in particular, ships, offshore units, sea ports and oil handling facilities”.

The competent national authority designated to oversee all matters pertaining to the OPRC convention under the Merchant Shipping Act 1995 as amended by the Merchant Shipping and Maritime Security Act 1997 is the Maritime and Coastguard Agency (MCA).

This plan has been prepared in accordance with the ‘Oil Spill Contingency Plan Guidelines for Ports, Harbours & Oil Handling Facilities’ issued by the Maritime and Coastguard Agency which is responsible for applying the regulations to all Harbours, Ports and Oil handling facilities in the UK.

1.2 Document Control and Plan Revision

The RoDMA Oil Spill Contingency Plan is a controlled document. All document holders, detailed in the distribution list, are assigned a specific copy number. Any changes to the situation at the dock, changes to be made to the plan or any other updates will be issued as amendments to all holders of the plan within 3 months of such change. Irrespective, the plan will be revised on an annual basis so as to incorporate changes occurring during the year plus lessons learned from the annual exercise. This document has an approved life span of 5 years from the date of approval by MCA and it shall be submitted in its entirety for re-approval after that time. The Engineering and Operations Manager will be responsible for maintenance and plan review.

This document is compiled in consultation with the following statutory bodies and authorities:

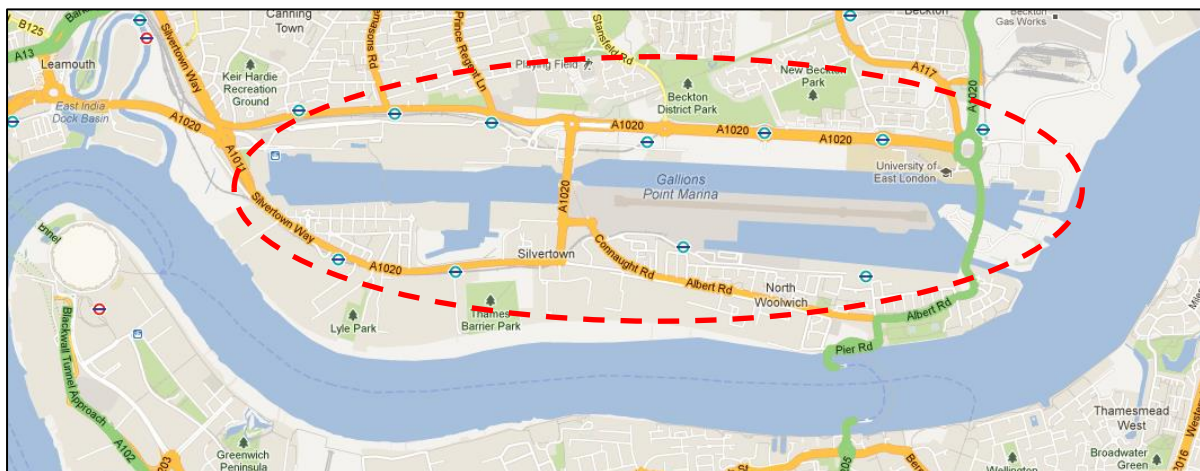
- Environment Agency (EA)
- Natural England (NE)
- Marine Management Organisation (MMO)
- London Borough of Newham

1.3 Use of Plan

This Plan is specifically for operations within RoDMA, and the associated pilotage area, for all vessels entering the Dock's boundary (figure 1). The plan is designed to initiate an appropriate oil spill response in the event of an incident. It details a tiered response strategy that is in accordance with UK legislative requirements and takes into account the spill risk associated with the operation; the nature of the hydrocarbons that could be spilt; the prevailing meteorological and hydrographic conditions and the environmental sensitivity of the surrounding areas.

1.4 Area of Operation

Figure 1: Location Map showing Boundary of Jurisdiction (red dashed line)



1.5 Identification of the Roles and Responsibilities of Parties Associated with this Plan

Within the UK there is an adopted structure and procedure for response to marine Oil Spills, which clearly defines the roles and responsibilities of industry, UK Government (including environmental agencies) and Maritime Authorities. Each statutory body has a designated area of jurisdiction within zones extending from the High Water Mark to 200nm or the UK Territorial Limit.

Table 1: Statutory Jurisdiction

Jurisdiction							
Authority	HWS	LWS	1nm	3nm	6nm	12nm	200nm
Docks	All operations within Dock limits						

Local ¹	
	Oil spill response out of Dock limits
MCA	
	Oil spill response, monitoring, advice
MCA (HMCg)	
	Search and Rescue
NE/JNCC ²	
	Conservation of the natural heritage
MMO ³	
	Marine environment and fisheries protection
EA ⁴	
	Water quality
HMC&E	
	Import duty

Local Authority¹	Has a duty of care to prepare and implement an oil spill contingency plan for response to oil spillage on the coastline from HWS to LWS.
NE / JNCC²	Natural England requires to be notified up to 12nm. JNCC's remit extends from 12nm to 200nm.
MMO³	Approves dispersants and their use in any depth of water and advise on their use in deeper waters – e.g. at least 1 nm beyond the 20 metre contours.
EA⁴	Requires to be notified on water quality issues up to 1nm.

Roles and Responsibilities of Concerned Authorities

The roles and responsibilities of all authorities requiring notification in the event of a spill and the appropriate paths of communication to be followed in the event of a spill are shown in Section 3.6 of this Plan. In the event of oil spill incident, RoDMA will be responsible for clean-up and the overall co-ordination of spill response within the area of jurisdiction.

Vessels in Transit

The statutory duty for reporting and dealing with pollution from any vessel en route to RoDMA prior to entering Dock limits or pilotage area lies with the Master and vessel owners. After commencing pilotage into the Dock through the designated area of jurisdiction covered by this plan, reporting and response to any pollution incident will be co-ordinated through the RoDMA office as stated within this Oil Spill Contingency Plan.

The roles and responsibilities of all authorities requiring notification in the event of a spill and the appropriate paths of communication to be followed in the event of a spill are shown in Section 3.6 of this Plan.

1.6 Scope of Plan

This plan has been compiled to cover the response to any spillage caused by or during operations associated with safe passage to or from RoDMA and within its jurisdiction.

The scope of the plan covers response to all the “Essential Elements” contained within the MCA Oil Spill Contingency Guidelines for Ports, Harbours & Oil Handling Facilities.

The Plan describes the Tier 1 response available at the Dock relevant to the perceived risk through normal operations as well as a mechanism for calling upon Tier 2 or 3 responses in the event of an

abnormal incident or major accident requiring the Dock's involvement. A definition of the tiered levels used in this Dock is shown below and the process of response escalation is described in Section 1.8 with notifications in Part 2 Section 6.1.

Table 2: Tiered Response Definitions

Response Tier	Definition
Contained Operational Spills	These are spills, which are contained on the vessel or Dockside and do not enter the water.
Tier 1	Small operational spills that may occur within a location as a result of daily activities. The level at which events can be controlled using on site resources. A tier 1 spill is not likely to require recourse to intervention by resources out with the Dock, an external incident response organisation or external authorities, except for purposes of notification.
Tier 2	Medium sized spills within the Dock, that will be handled by Dock Personnel and a nominated contractor or other external assistance as nominated within this plan. A tier 2 incident may involve local government. Oil spill response to be co-ordinated via the Dock or local authority.
Tier 3	Larger spills or a loss of containment incident that will require full involvement of other authorities and possible mobilisation of Tier 3 and national stockpiles. A tier 3 incident is beyond the capabilities of both local and regional resources. NB: A Shoreline Response Centre (SRC) will be established to coordinate onshore operations, following the agreement of the local authority and / or RoDMA and the Maritime Coastguard Agency (MCA), and a Tier 3 spill declared.

1.7 Risk Assessment

A risk assessment to meet with OPRC Contingency Planning requirements for Ports & Terminals has been completed by Adler and Allan Ltd on the basis of a format previously agreed with MCA.

Scope of Assessment

This assessment covers operations where vessels and users are under the jurisdiction of RoDMA. The Dock is located on the north side of the River Thames, London. The Dock limits are delineated by the boundary formed by the Dock wall and outer lock gate. The Dock is managed the Royal Dock Management Authority. Dock usage is equally split between commercial and leisure activities, London City Airport has its runway located in the centre of the Dock jurisdiction area.

Factors and Assessment

This risk assessment is designed to identify potential oil sources, the size of potential spills and to estimate the probability of events that may result in a release of oil into the marine environment. The result will be a targeted, specific investigation which will identify areas of unacceptable risk and potential mitigation methods.

In order to assess the consequence, and subsequent overall risk acceptance criteria of a spill, it is important to identify the oil containing systems associated with dock operations. All oil containing systems (source) connected with the harbour operations, initiating events that could result in an accidental spillage and the potential maximum volume that could be released were identified and examined. Probability and consequence are then combined in a risk matrix model to ascertain overall risk acceptance criteria.

The frequency of a specific type of incident can be expressed as probability and when classified into criteria should provide an indication as to the most commonly occurring events. Control measures can reduce the probability of an event occurring. Therefore the full range of control measures implemented by RoDMA to minimise the risk of an oil spill event have been considered before applying specific probability criteria.

The following tables (Table 3 and 4) describe the probability and consequence ratings used in this risk assessment.

Table 3: Probability of Scenario Occurrence

Level	Frequency Description
1	Remote A highly improbable occurrence
2	Low Has happened internationally
3	Moderate Has happened nationally
4	High A remotely possible but known occurrence Has happened within the company
5	Very High, an occasional occurrence Known occurrence Has happened on Site

Table 4: Consequences

Level	Consequence	Description
1	Insignificant	Causes slight nuisance off or on site of short duration Slight excursion above consent/detectable fish kill/discolouration of receiving water Aroma of oil in air, slight slivery sheen on water
2	Minor	Moderate excursion above consent/minor impact on receiving water Aroma of oil, definite rainbow sheen on water
3	Moderate	Extensive damage to immediate environment, Definite aroma of oil in air, Oil visible as metallic sheen on water surface, Large diesel spill or small heavy oil spill
4	Major	Severe and extensive damage to environment Extensive contamination of nearby shorelines Large heavy oil spill
5	Catastrophic	Severe environmental damage to surrounding area

Probability and consequence can be multiplied to produce an overall risk rating. This can then be applied to specific scenarios in order to prioritise potential control measures and risk minimisation procedures. The following table (table 5) determines the overall level of risk. In principle, all risks

should be within the insignificant to minor categories. Moderate risks and above will require attention and improvement plans to reduce the risk.

Table 5: Overall Level of Risk

Probability	Consequence				
	Catastrophic (5)	Major (4)	Moderate (3)	Minor (2)	Insignificant (1)
Very high (5)	Very high (25)	High (20)	Moderate (15)	Minor (10)	Low (5)
High (4)	High (20)	High (16)	Moderate (12)	Minor (8)	Low (4)
Moderate (3)	Moderate (15)	Moderate (12)	Moderate (9)	Minor (6)	Low (3)
Low (2)	Minor (10)	Minor (8)	Minor (6)	Minor (4)	Low (2)
Remote (1)	Low (5)	Low (4)	Low (3)	Low (2)	Low (1)

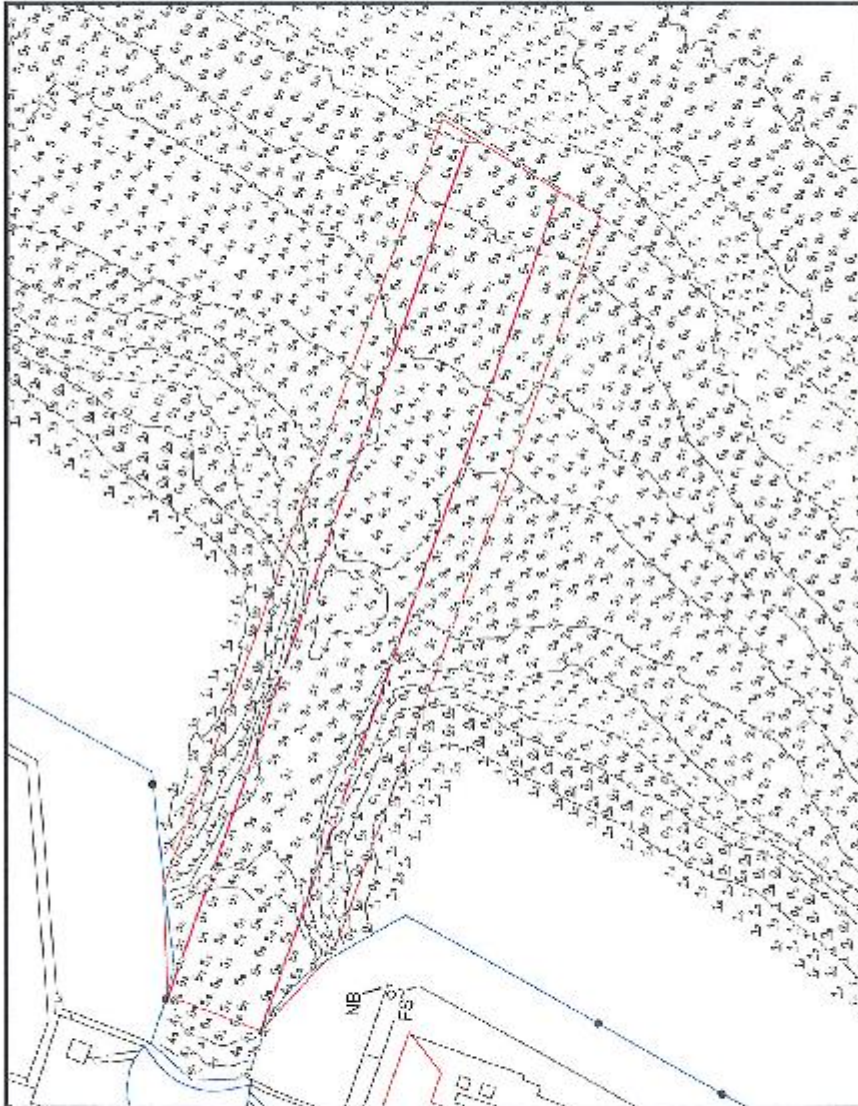
When potential hazards and the probability of their occurrence have been established the oil type and fate of the oil must be considered to evaluate the consequence hydrocarbons may have upon the resources within the marine environment and to establish the area of potential impact. It should be remembered that although the level of risk of an incident occurring may be low, the level of impact on the natural heritage can potentially be high (high volume or increased toxicity of the fuel etc.). The consequence each identified hazard is evaluated using the level of risk and the impact. Should the biological impact be rated high, the risk overall will have a higher rating.

Hydrocarbons are broadly grouped into four categories: group I oils such as diesels are non-persistent and will tend to dissipate completely within a few days. Group II and III oils are more persistent and have a tendency to form emulsions. Group IV oils are very persistent due to the lack of volatile constituents and will remain in the environment indefinitely (ITOPF 2006/2007). The volume and type of hydrocarbons released will determine the consequence for low to high probabilities. The consequence for all low to high probabilities will be mild to severe unless proven otherwise.

Risk: Passage and Berthing within the Dock

All vessels arriving at RoDMA inform the RoDMA office of their estimated time of arrival. Regular commercial marine traffic into the Docks is currently limited to River Thames passenger boats transporting passengers to and from central London and the ExCel. A number of naval vessels visit the Dock during the bi-annual defence exhibition. The London boat show attracts a number of sailing vessels, motor cruisers and various feature boats. Access to the Docks is via a set of lock gates from the River Thames. Berthing failure is considered to be a low level risk due to Dock controls and slow speed of vessel movement. Collision risk is very small and the only scenario envisaged is being between a vessel whilst manoeuvring and small pleasure craft.

The docks can facilitate a maximum draught of 11.0m and maximum length of 200.0m with a beam of 30.0m. Navigational access is tidal with a dredged channel entering from the River Thames dredged to 3.0m below chart datum. The docks offer anchoring and vessels can moor alongside all docks. There are no repair facilities, dry docks, tugs or pilotage services offered. There is no commercial fishing allowed within the dock. The dock allows leisure rowing, a marina facility and a static water skiing area.



Dredged channel entering the docks.

Risk: Bunkering Operations

There are no bunkering operations ever undertaken within the docks.

Risk: Ditched aircraft from London City Airport

The London City Airport has its runway located in the middle of the dock waterway.

Risk: Leak from London City Airport fuel storage / transfer

An unknown quantity of aviation fuel is located on the London City Airport site.

Risk: Vehicles entering Dock

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There are two road bridges spanning the docks, Connaught Bridge (A1020) in the western region of the docks and Woolwich Manor Way Bridge in the eastern region of the docks.

Note: *Spillages of diesel fuel and / or lubricating oil and illegal bilge pumping have been identified as the most likely source of oil pollutant to enter the Dock water column. RoDMA personnel are to be trained in operating procedures to prevent oil spills, and where practical, maintain that all visiting vessels be in good condition to use the Dock subject to inspection by RoDMA.*

Any vessel entering the docks must provide RoDMA with their insurance detail and Risk Assessments and Methods Statements (RAMS) for their activity.

Table 6: Summary of Risk

Source Land/air/marine	Hazard	Volume	Risk prior to control	Control measures	Consequence	Probability	Risk overall
Operational							
Marine	Passage and berthing	Unknown	Minor	Slow speed and guidance from dock authority personnel	2	3	Minor
Air / Marine	Ditched aircraft	Unknown	Minor	CAA compliance	5	2	Minor
Land	Leak from London City Airport	Unknown	Moderate	Primary and secondary containment measures - airport specific	2	3	Minor
Land	Vehicles entering docks	Unknown	Minor	Road bridge barriers	2	3	Minor

Response Strategy

Small oil spills within the Dock will be recovered using tier 1 materials (namely sorbent equipment) held in stock by RoDMA. In the event of a tier 2 spill, this will be contained, recovered and disposed of by the nominated RoDMA contractor, Adler and Allan who offer a <4.0hour response time in working hours and a <6.0hour response time out of working hours. Oily waste will be disposed of by a certified disposal route. Dispersants will not be used. Any spillage of the size nominated within this study would be recovered using sorbents or mechanical means where possible. Booming for containment would not be necessary within an enclosed dock, booming however would be used to corral product to an extraction point.

Overall Conclusion

RoDMA is considered to be a minor risk. Proper controls exist through set procedures. There are few vessel movements and no oil tanker movements within the Dock limits. It is considered that there are adequate procedures in place to ensure that the chance of an operational spill is minor, both from the dock themselves and the London City Airport.

Tiered response level is determined by;

- Tier 1, <100L
- Tier 2, >100L – 110T (or as deemed necessary by RoDMA management personnel)
- Tier 3, >110T

1.8 Environmental Sensitivities and Priorities for Protection

General strategy

On all occasions Natural England (NE) must be contacted if an incident were to occur.

The Royal Docks are designated as a protected site of nature conservation interest in the London Borough of Newham Unitary Development Plan (UDP). Two aquatic bird rafts have been provided in Pontoon Dock to promote Arctic Tern breeding during the month of April.

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Photograph 1: Arctic Tern breeding raft



Where possible, considering safety and open water conditions, any floating gas oil on the water surface should either be allowed to degrade naturally or be removed physically – **no chemical dispersants are to be used.**

Note: The Marine and Coastal Access Act 2009 and the Marine Licensing (Exempted Activity) Order 2011, requires approval for the use of substances to treat oil on the surface of the sea. However, approval is not needed under this order for the use of equipment to control, contain or recover oil. This means that respondents do not need to approach MMO before the use of items of equipment like recoverable absorbent booms, absorbent rolls, absorbent tails and absorbent pads. Respondents do however need to ensure that they have MMO approval for the use of any items like loose absorbent granules, chips, moss, sawdust or chemicals which would be classified as substances rather than equipment if there is a possibility of these substances entering the marine environment.

Inner Thames Marshes Site of Special Scientific Interest (SSSI): the largest remaining expanse of wetland bordering the upper reaches of the Thames Estuary. The site is of particular note for its diverse ornithological interest, and especially for the variety of breeding birds and the numbers of wintering wildfowl, waders, finches and birds of prey, with wintering teal populations reaching levels of international importance. The Marshes also support a wide range of wetland plants and insects with a restricted distribution in the London area, including some that are nationally rare or scarce.

West Thurrock Lagoon and Marshes SSSI: one of the most important sites for wintering waders and wildfowl on the Inner Thames Estuary. The combination of extensive intertidal mudflats together with large and secure high tide roost attracts waders in nationally important numbers with significant populations of other bird species. The adjacent Stone Ness saltmarsh is noted for the size and character of its high marsh plant community.

Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site: a wetland of European importance comprising a mosaic of intertidal habitats, saltmarsh, coastal grazing marshes, saline lagoons and chalk pits. The site provides wintering and breeding habitats for important assemblages of wetland bird species, particularly wildfowl and waders as well as supporting migratory birds on passage. The site forms part of the wider Thames Estuary together with other classified SPAs in both Essex and Kent. The marine component of the SPA includes intertidal mudflats, saltmarsh and shingle.

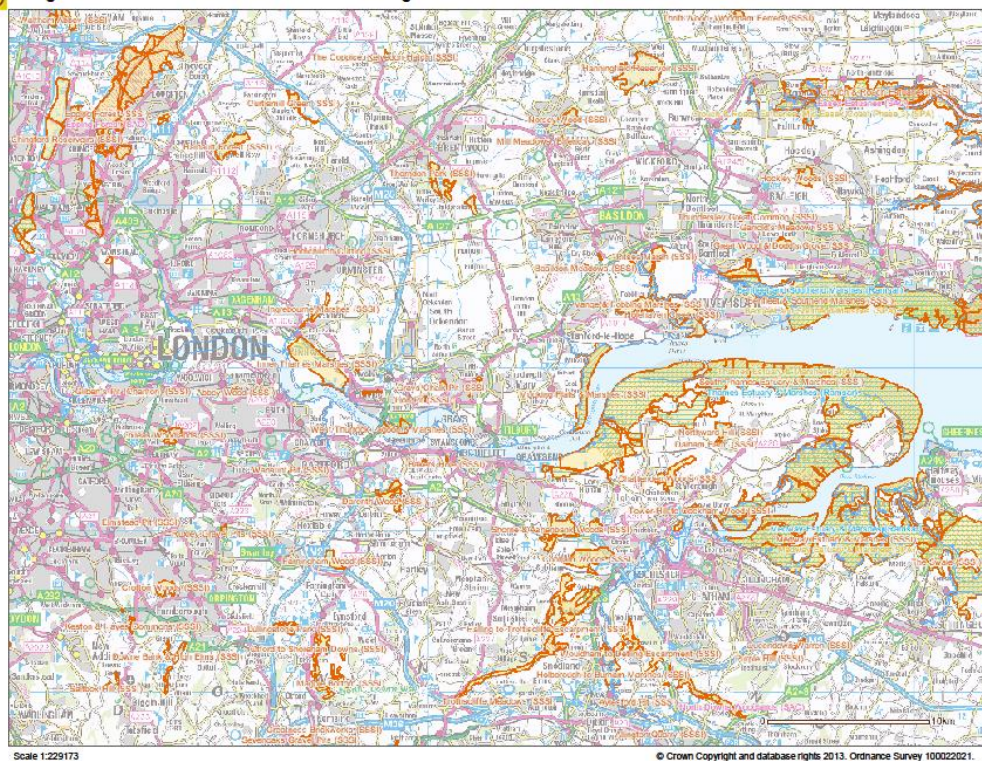
South Thames Estuary and Marshes SSSI: an extensive mosaic of grazing marsh, saltmarsh, mudflats and shingle characteristic of the estuarine habitats of the north Kent marshes. The site supports outstanding numbers of waterfowl with total counts exceeding 20,000. Many species regularly occur in nationally important numbers and some species regularly use the site in internationally important numbers. The breeding bird community is also of particular interest. The diverse habitats within the site support a number of nationally rare and scarce invertebrate species and an assemblage of nationally scarce plants.

Mucking Flats and Marshes SSSI: an extensive stretch of the Thames mudflats and saltmarsh, together with seawall grassland. The saltmarsh is dominated by sea couch and sea purslane, and to seaward has patches of the nationally scarce golden samphire and other nationally scarce plants. The mudflats form the largest intertidal feeding area for wintering wildfowl and waders west of Canvey Island on the north bank of the Thames. Ringed plover occur in internationally important numbers, with nationally important numbers of Avocet, Black tailed godwit, Dunlin, Grey plover and Shelduck.

There is office space to accommodate the SRC, SCU and EG within the docks office accommodation.



Designations of the River Thames and Surrounding Areas



Fate and Movement of Spilled Oil

The fate and movement of spilled oil cannot be easily predicted because of several unknowns such as, the point of spillage and the prevailing wind regime at the time of spillage (tidal range, etc. is not an issue in the dock due to lock gates). Any spillage will be wind driven at 3.3% of the wind speed.

In general terms the Dock Authority will attempt to stop any movement of oil from the point of spillage using the tier 1 equipment available within this plan. If oil does spread and leaves the area of the Dock Jurisdiction in any quantity that may impact a sensitive area, the spill shall be upgraded to tier 2. The EA, NE and Local Council will be advised and the appropriate action taken as described within Part 2 of this plan.

The booming and collection of such oil after it leaves the area of the Dock jurisdiction will be dealt with as described within the Protection Strategy Plan for the surrounding area. The Dock Authority will advise on the likely track of the spill and possible point of impact and the response will then become the joint responsibility of the Dock Authority through its tier 2 contractors, the PLA, EA and the Local Authority response plan.

1.9 Categories of Incident

RoDMA has in place a three tiered incident response system for oil spillage. The responsibility of escalating an incident from tier 1 to tier 2 lies with RoDMA.

Levels of Call-out

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Tier 1 Spills

For minor spills, where the response is addressed within the Dock area, RoDMA will take the appropriate action and arrange for safe storage and legal disposal of waste arising. Since all oil spills, regardless of size, have to be reported to the Authorities, RoDMA will always alert the MCA.

Tier 2 and Tier 3 Spills

For all spills of a higher level, RoDMA will activate the Response required according to this Plan.

1.10 Waste Disposal Operations

NB: Within this Plan waste oil refers to the disposal of oil which has been contained and recovered as the result of a spill or a pollution incident. The safe handling and disposal of recovered oil is governed by relevant sections in the following legislation:

1. Control of Pollution (Amendment) Act 1989,
2. The Environmental Protection Act 1990,
3. The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991,
4. Environmental Permitting Regulations 2010,
5. Landfill (England and Wales) Regulations 2002,
6. Hazardous Waste (England and Wales) Regulations 2005,
7. List of Wastes (England) Regulations (2005),

If oily waste material is produced as a result of a pollution incident then the polluting party (operator) has a duty of care to ensure that the waste is contained, handled, transported and ultimately disposed of in an appropriate manner. If the material is to be handled by contractors then the operator (to reduce liabilities to a minimum) has to ensure that each contractor has the relevant transportation registration and waste management licences, where applicable. In addition HM Customs and Excise must be notified if recovered oil is brought ashore by dedicated oil recovery vessels. Landing should not be hindered by the absence of an official from HM Customs and Excise; however, the Operator should maintain a careful log on quantity and nature of the recovered oil.

The options for waste disposal or treatment of material, be it oily liquids or oil solids are:

- a) Take to appropriate disposal sites;
- b) Temporary store, clean, stabilise and then recover or re-use;
- c) Temporary store and then take to appropriate disposal site for burial;
- d) Take to a refinery/incinerator (mainly for oily liquids only)

a) Direct to Appropriate Disposal Site

Environmental Permitting Regulations (EPR) 2010. There are only a few sites that are allowed to receive organic or chemically polluting materials (includes oily waste). There will be a charge levied by the site operator for depositing material at the site. In addition there is a landfill tax/levy applied to all waste deposited in a landfill. Furthermore, waste oil is likely to be classified as Hazardous Waste and should be treated as such until otherwise determined. It would therefore be subject to the EPR 2010. Mixes of sand and oil/seawater etc. would probably be considered as Hazardous Waste if the percentage of carcinogenic compounds is above 0.1%. It is therefore likely that oily beach materials and oil/water liquids would have to be handled as Hazardous Waste.

The transportation of Hazardous Wastes generally requires that the EA be informed before the waste is removed. This is done by filling in parts A, B and D of a Hazardous Waste Consignment Note, available from the EA, which is sent to EA responsible for the receiving facility. This should be done at least three clear working days before the waste is to be moved. However, in the event of an 'emergency' EA may waive the requirement for pre-notification. The licensed waste carrier completes part C of the Consignment Note and takes it with the load to the receiving facility. The licensed operator of the receiving facility then signs the consignment note to say that they have accepted the load and that they are authorised to manage it properly.

The requirement for pre-notification generally does not apply to special waste from ships. Therefore oil recovered at sea by a dedicated Oil Recovery Vessel could be discharged within a harbour to an appropriate waste reception facility without having to pre-notify EA. However a consignment note will have to be supplied with each load sent for disposal.

To ensure that oily waste material is transported and disposed of in an appropriate manner, a licensed waste carrier and disposal company should be contracted. The Operator and Waste Disposal Company should then liaise with EA to confirm that the disposal route identified meets with their satisfaction.

Each of the following options for disposal will be subject to all the factors listed above.

b) Temporary Storage/Clean, Treat, Stabilise, Recover, Reuse

This option aims to store temporarily the material and then, slowly over the ensuing period, to clean it or stabilise it and then to recover or reuse it. In most cases this is the best practical environmental option (BPEO). It avoids the risk of changing what was a marine pollution into an inland surface pollution problem or groundwater pollution problem.

From temporary storage the contaminated material can be stabilised with cement, lime, clay, organic binders, asphalt and composting. The characteristic of each product needs to be considered when determining the ultimate disposal route or any perceived end use. It is important to note that the treatment of wastes also comes under the waste management licensing system. Therefore, any strategy to deal with the waste in this manner can only be developed through close liaison with the Local Authority concerned and EA. The latest guidance from the EA indicates that if proposed temporary storage sites are pre-identified, suitable and pre-agreed with EA, then they would not require licensing for the duration of the emergency.

c) Temporary Storage and Appropriate Disposal Site for Burial

The reasons for constructing a temporary storage site are as follows:

1. There is no immediate disposal outlet for large quantities of oil/sand mixture or for oil/water mixtures and clean-up cannot be slowed or stopped.
2. The equipment used to clean beaches is usually labour intensive and therefore requires an immediate transfer area adjacent to the site to be provided.
3. The nature of the roads precludes high traffic densities.
4. The in situ treatment of contaminated material is often preferable to removing large quantities of material from the shoreline.

In creating a temporary storage site it is essential that consideration be given to the positioning of the sites to ensure that there will be no spread of pollution. A flat clear area needs to be set aside (car park or similar). Preparation should include the isolation of the area by blanking drains, stoppering outlets and laying impermeable membrane so as to provide laydown area for skips or suitable bunkering for waste containment. In addition, under the above legislation, the temporary storage site itself may require a Registered Exemption from Waste Management Licensing. Each site will have to be constructed in a specific manner. It is therefore essential that the construction of temporary storage sites be done through close liaison with the EA, NE if in or near a SSSI, and the Local Authority concerned.

d) Take to a Refinery/Incinerator (mainly for oily liquids only)

This material should be removed from site by a licensed waste handling company who will then arrange for its disposal in an appropriate manner. If there is suitable access, oily liquids produced from a shoreline clean-up operation can be removed from site by road tanker.

If the oily liquids are on-board a dedicated recovery vessel following an at sea containment and recovery operation then it can be transferred across the quay, at a suitable berth to a road tanker or other suitable waste reception facility. Alternatively this waste can be fed directly into the reception facility at a marine terminal if an oil refinery. It is the responsibility of the Ships Master to ensure that this waste is disposed of appropriately. However, the Dock Authority must confirm that any contractors have the necessary licenses to handle and dispose of the waste. The disposal route should also be agreed with EA to ensure it meets with their satisfaction.

Section 2: Training and Exercise Policy

2.1 Training Policy

In order to familiarise personnel in the use of this Oil Spill Contingency Plan and comply with MCA guidelines, Oil Spill Response training courses will be held for selected employees of RoDMA, their contractors and dock operators with an identified role within the plan. In addition, there will also be awareness briefings with other dock users and the Agencies who were involved in the consultation process.

After initial training, instruction will be specific; with the use of the tier 1 oil spill response equipment located at RoDMA. This will be tested and deployed using those personnel who will be responsible for operating this equipment in the event of a spill.

In order to meet the minimum levels as recommended in the MCA guidelines, the training and exercising of key personnel is detailed below.

Table 7: Training in the use of this Plan

Training in the use of the this Plan				
Position	Awareness	Minimum hours	Ports and Harbours	Target audience
Operators	Basic use of tier 1 sorbents and understanding contingency plans and operations	8	MCA 1p	First responder – absorbent response
Dock Management, Council Oil Pollution Officer, Council Assistant Oil Pollution Officer	Ability to control and put a specific contingency plan into action as OSC	32	MCA 4p	Dock Management, Council Oil Pollution Officer, Council Assistant Oil Pollution Officer
All personnel	Refresher	8	MCA R	Those who have undertaken training not more than 3 years previous

2.2 Exercise Programme

To ensure that the Oil Spill Contingency Plan is understood by all those involved in its use, communications and practical exercises should be undertaken on an annual basis. This will be undertaken using those personnel who will be responsible for operating this equipment in the event of a spill, namely Dock personnel and tier 2 contractors.

Table 8: Exercise in the use of this Plan

Exercise type	Frequency
Notification & Mobilisation Exercises	Twice per year
Table-top Exercise (may incorporate mobilisation and deployment of local response equipment)	Once per year
Incident Management Exercise (IME) (will incorporate mobilisation and deployment of resources up to Tier 2 Level)	Once every 3 years

2.3 Forms to be completed – Post Exercise

On page 17 is a post exercise / incident report form which should be completed and forwarded to CPSO and all relevant plan holders, each time an exercise is carried out. Similarly if a real incident were to occur, details should be logged and copied to the MCA.

Post Exercise / Incident* Report			
Name of Port/Harbour/Oil handling facility:			
Tier level (1, 2 or 3):		Name exercise / incident:	
Names of any other participating ports, harbours or oil handling facilities if joint equipment deployment exercise / incident:			
Date of exercise / incident:		Time of exercise / incident:	
Location of exercise / incident:			
Name of exercise / incident co-ordinator:			
Name of personnel participating in exercise / incident and role played:		List of equipment deployed:	
Name of any other organisations or authorities participating in exercise / incident:			
Details of amendments to be made to the Contingency Plan resulting from this exercise / incident:			
I can confirm that the details on this form provide a realistic summary of the exercise / incident. Any action points resulting from this exercise / incident have been dealt with accordingly, the relevant documents updated and copies provided to the appropriate bodies for their attention			
Authorised by: (block capitals)		Position / job title:	
Signature:		Date:	

*Delete as appropriate

To ensure that MCA's records remain up-to-date, Dock authorities should complete an annual return of changes made (for example, exercise conducted, new personnel trained etc.). 'Nil' returns should also be submitted. Electronic copies of the following form can be obtained from the MCA.

OSCP RoDMA June 2018Rev3

Section 3: Incident Response Organisation

3.1 Introduction

This plan has been compiled to cover the response to any spillage caused during operations within the jurisdiction of RoDMA. Spills from shore side operations, vessels alongside in transit or passage. The Plan indicates the tier 1 response available at the Dock relevant to the perceived risk through normal operations as well as a mechanism for calling upon tier 2 or tier 3 responses in the event of an abnormal incident or major accident affecting the dock.

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3.2 Responsibilities and Incident Control Arrangements

The Response Team will be led by the RoDMA Manager. A Marine Response Centre will be established in the RoDMA office.

Manager

The RoDMA Manager will act as Incident Controller and On-Scene Commander.

The Response Team Members comprise of:

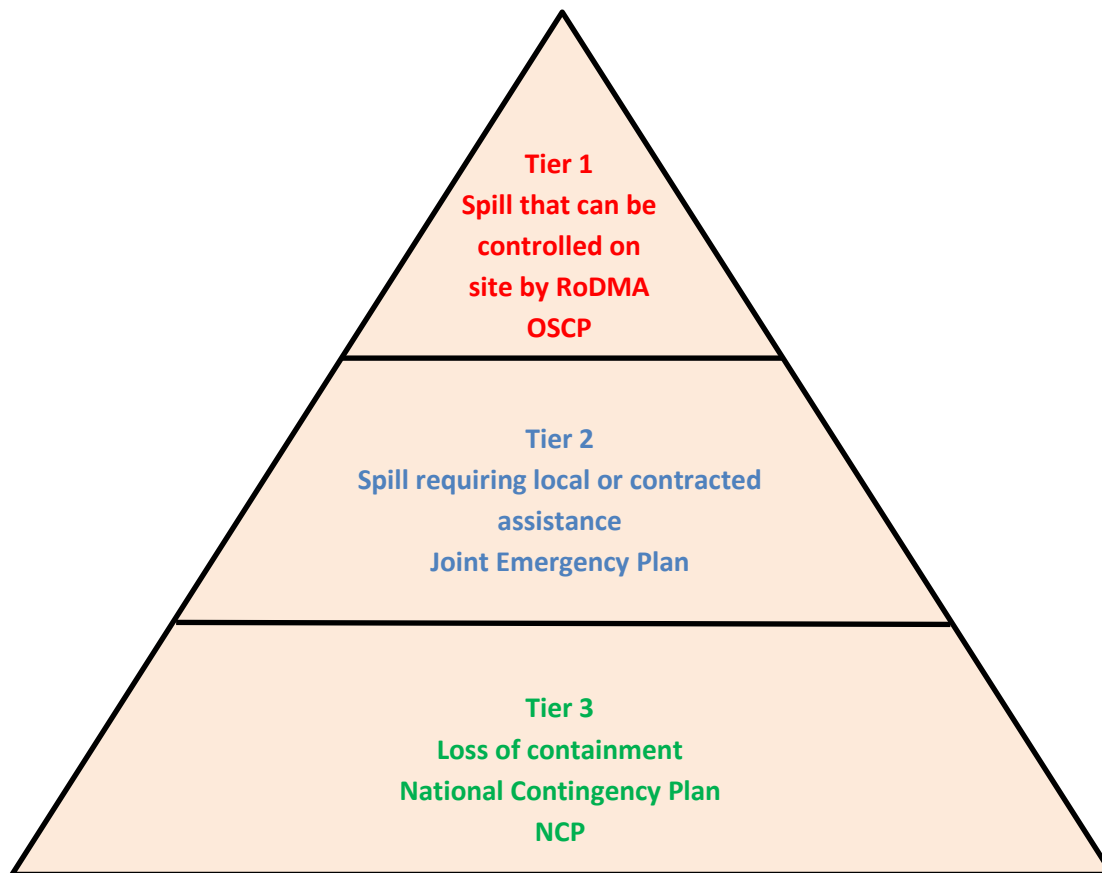
- RoDMA Manager, Incident Controller / On-scene Commander
- RoDMA personnel, responders

3.3 Dispersant Use

The use of chemical dispersant is not permitted within the area covered by this plan. Under The Marine and Coastal Access Act 2009 and the Marine Licensing (Exempted Activity) Order 2011, it is a legal requirement that oil treatment products may only be used in English waters if they have been formally approved for this purpose by MMO. In addition, specific permission from MMO must be obtained before any such products are used at any depth – these are defined as any area of the sea which is less than 20 metres deep, or within one nautical mile of such an area.

3.4 Interfaces with other Contingency / Emergency Plans

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3.5 The Role of the SOSREP

The Secretary of State's Representative's (SOSREP) role has been created as part of the Government's response to Lord Donaldson's Review of Salvage and Intervention and their command and control. The report identified that during salvage activities, ultimate control over all operations should become the responsibility of a single designated Secretary of State's Representative (SOSREP) for purposes of maritime salvage and intervention and that the SOSREP could not abdicate his responsibility. Whether or not he exercised any intervention powers at all SOSREP would be in no doubt what so ever that he was in charge and would be held responsible for the outcome of all plans and decisions. Put simply - to ignore a situation is not an option.

The powers of Intervention with which SOSREP is invested could indeed not be more far reaching. They are however presently wider for response to pollution than for safety. They provide that SOSREP can direct a person to take, or refrain from taking "any action of any kind whatsoever. Indeed, if SOSREP is not convinced that the person directed can, or will, take the action then he may cause the action to be taken himself - even if this includes the total destruction of a vessel. The legislation also creates criminal offences for noncompliance with a Direction. It should be noted that Directions must be given to specified persons who are those being in charge of a vessel or a port or harbour authority.

3.6 Internal Alerting and Call-out Procedures

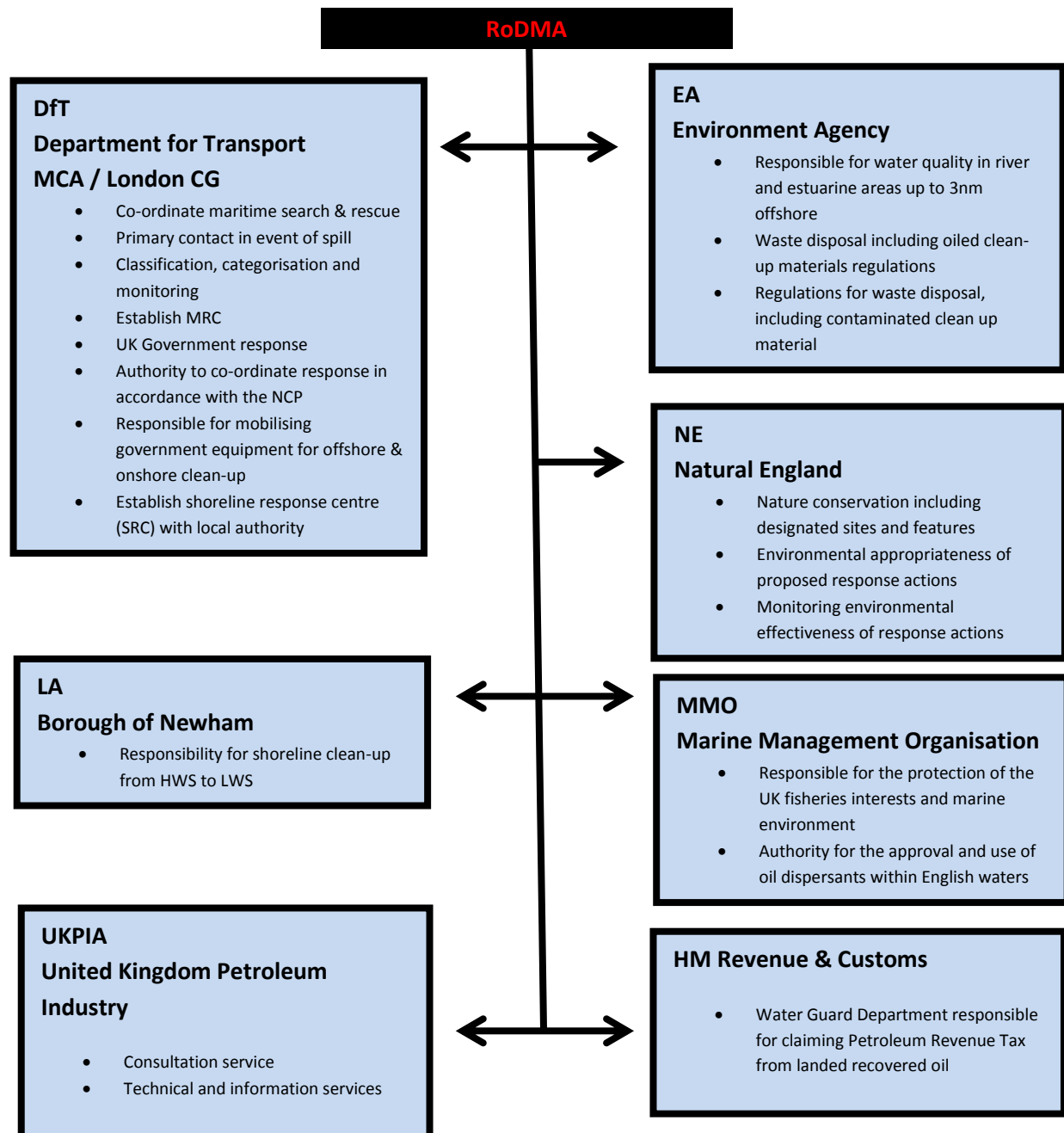
An initial spill report will come in the first instance, during working hours, to the RoDMA office. Out of working hours reports are liable to come via MCA, Police EA the public or pilots. The information received must be passed immediately to RoDMA. The RoDMA Manager will do his best to confirm the incident details and determine the level of clean-up operation necessary and the requirement as to whether to activate a Response Team. All calls and decisions made must be recorded, and an oil spill report form raised.

In the event of an incident requiring salvage operations the Secretary of State's Representative (SOSREP) will decide whether it is necessary to set up a Salvage Control Unit (SCU). If the size of the incident merits the establishment of a SCU, the SOSREP will travel to the scene at the appropriate time. Upon establishment of a SCU RoDMA will become an active member of the SCU team liaising with the SOSREP throughout the course of the incident. The members of the SCU are:

- SOSREP;
- the Salvage Manager from the salvage company appointed by the ship-owner;
- RoDMA, if the incident involves the harbour or its services;
- a single representative nominated by agreement between the ship-owner and the insurers (for both the physical property and their liabilities);
- a CPSO;
- an Environmental Liaison Officer, nominated by the Chair of the Environment Group; and
- if SOSREP decides to appoint one, SOSREP's personal salvage advisor.

3.7 Liaison Procedures with Other Agencies

Rapid passing of information to other affected agencies is essential for effective response. Shown below are agencies concerned and their roles.



Section 4: Response Strategies

4.1 Health and Safety

It is essential that an effective health and safety management plan be maintained at all levels throughout oil spill clean-up operations.

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Statutory Duties - Applicable Statutory Law and its Implications

The Health and Safety at Work Act 1974 places a clear duty on all employers and persons responsible for premises to ensure that the workplace is safe and in the case of the employer, to have a safe system of work. This duty is placed regardless of whether the workers are employees, sub-contract workers, temporary workers or self-employed persons.

Implementation of the Health and Safety at Work Regulations 1999 requires that all employers carry out suitable and sufficient Risk Assessments of all tasks to be undertaken in the workplace. Where five or more employees are employed then the Assessment is to be recorded and those at particular risk must be informed accordingly.

These same regulations require that the employer executes a Safety Management System and that measurement of performance against standards is made. All employees must receive adequate training, information and supervision additionally, there is a requirement for all employees to receive suitable and sufficient health surveillance to ensure that they are fit to carry out the work and that the work and conditions do not cause them adverse effect.

The Provision and Use of Work Equipment Regulations 1998 requires that all equipment provided for use at work is safe and fit for purpose. The persons using the equipment must be adequately trained in its use and the operation must be properly supervised.

The Personal Protective Equipment Regulations 1992 requires that all equipment provided is fit for purpose and does not cause adverse effect. That all personnel are trained in its use and that all associated risks are recorded controlled and pointed out to those affected.

The Manual Handling Regulations 1992 requires that all work where lifting, pulling and pushing is involved, is assessed and all risks to the health and safety of those involved are reduced to a level as low as reasonably practicable.

The Control of Substances Hazardous to Health Regulations 2002 requires that all substances to which a worker may be exposed, including dusts and gasses are properly assessed and the risks to health reduced to a safe and acceptable level.

Site Safety Plan

To achieve a Safe Operations, those in charge of the Response must follow those generalised parts of the Contingency Plan, which apply in all circumstances. Additionally they must have available the means to prepare those elements of the Plan which are Site and Response Specific.

The Site Safety Plan is intended to prevent uncontrolled incidents occurring which may cause further damage to the environment or loss due to damage, injury or illness. The Site Safety Plan should comprise the following sections:

- a. Site Survey
- b. Operations Analysis
- c. Site Control
- d. Logistics and Supplies
- e. Personnel

Each Section should be addressed jointly and separately before work commences and the appropriate steps taken to ensure that requirements are adequately met.

a) Site Survey

A Site Survey Form should be available, which when followed correctly will add all of those site unique details which assist in the decision making process and remind staff of essentials which might otherwise be omitted. The Site Survey should address the safety of those personnel taking part in the clean-up as well as those members of the public who may also be involved. The following list indicates a few of those subjects which, should be assessed and reported in the survey. The list is by no means exhaustive.

- Communications Requirements
- Exposure to Temperature
- Feasibility of handrails or ropes
- Hazards to the eyes
- Lack of or shelter from weather
- Lighting conditions
- Machinery usage
- Manoeuvrability
- Manual handling
- Pedestrian traffic
- Requirement to access confined spaces
- Sample collection
- Terrain surface and incline
- Vehicle traffic
- Visibility
- Water Hazards

b) Operations Analysis

Having surveyed the site and assessed the aspects which are influenced by the terrain, water conditions, and other pertinent factors. The on scene commander will assess the way in which the operation is to be conducted. The intention to use the following facilities can be stated and the reasons for and priorities of each facility established.

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- Booms and Skimmers
- Cranes
- Boats
- Breathing apparatus
- Detergents
- Forklifts
- Hoses and Pumps
- Low loaders
- Motor vehicles
- Raking and sweeping gear
- Winches

c) Site Control

It is essential that those in charge of the spill clean-up have control of the site as soon as possible and before any significant part of the clean-up operation begins. Access to the site must be restricted to those personnel who are essential to the clean-up operation. Arrangements must be made for the area to have a barrier, closed and policed such that no one can enter the work area without reporting to the site supervisor. No workers should be allowed on site until they have received the full vetting and briefing with respect to the Safety Assessment.

d) Logistics and Supplies

Specifically with respect to safety, it should be ensured that the appropriate equipment, materials and substances are available at the required times. Particular attention should be paid to the availability of the various sizes of protective clothing required. This sometimes cannot be established until the members of the workforce have been detailed and their individual roles and tasks decided.

Consideration must be given for a prolonged clean-up operation possibly stretching to 24 hours operations. In which case shelter, accommodation, feeding, refreshment, rest areas, sanitation and first aid, must be available.

Where training has to be delivered prior to work commencing, the necessary instructors and equipment must be available before work commences. It is an error to allow experienced workers to commence work whilst others are waiting for training.

Protective Clothing. If the weather is at all inclement, the protective clothing issued to workers must be warm, water and chemical-proof. It should include coveralls, gloves, boots, eye protection and headgear. If the weather is warm, the use of the same protective clothing may be necessary, but the requirements for ventilation and cooling will be greater.

Personal Protective Equipment (PPE)

- Breathing Apparatus including Respirators
- Flotation Suits and Vests
- Gloves/Gauntlets
- Protective Clothing
- Goggles, Visors and Safety Glasses
- Hard Hats
- Insulated Clothing
- Reinforced Boots, Shoes and Gloves

First Aid. The Health and Safety (First Aid) Regulations 1981, together with the New Code of Practice on First Aid, lay down the requirements for trained first aiders and the equipment that must be provided. A foreshore clean-up is considered as a special circumstance and the appropriate extra provisions should be taken into account.

e) Personnel

Selection of Personnel to carry out the clean-up must be dominated by safety considerations.

Safety on the Water

Agreements with the Coastguard should be reviewed and complied with. At the very least, they should be informed of the vessels operating in their area together with all necessary detail of vessel capability and persons on board.

Protective Clothing. Workers operating from sea-going vessels should be equipped with harnesses built to BS 1397. They should, at all times, wear a self or automatic inflating lifejacket and should be protected by a Survival Suit.

Safe Operations**Risk Assessment**

Hazard Identification. The identification of all hazards at a worksite or spill location is a singular task that should be done by involvement of the people who are expected to carry out the work. The supervisor responsible for co-ordinating the risk assessment should ensure that all hazards are identified before the next step in the process is attempted. A hazard is an object, place, process or circumstance with the potential to do harm in the form of injury, damage, delay or pollution.

Decontamination**Conditions requiring decontamination**

Where workers have been wearing waterproof and protective clothing, it is likely that the clothing will become contaminated by oil or chemicals that might have been used during the clean-up operation. The clothing needs to be cleaned to prevent further contamination. Facilities for such cleansing should be made available either near to rest or feeding areas or close by, but clear of the work site.

Personal hygiene practices on the job

Workers should be instructed on the dangers of ingesting hydrocarbons and chemicals through contact of contaminated equipment or clothing, such as gloves via the mouth and nose. Facilities for removing protective clothing and washing before consuming food or smoking should be made available.

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Decontamination Area Drainage

The decontamination area where clothing and personal equipment is cleansed should be arranged so that cleansing water and contaminants are drained into tanks. Care should be taken to ensure that contaminated waste does not drain into either the normal drainage system or into the soil under the decontamination area.

Disposal of Contaminated Clothing

Clothing, which is not fully washable or capable of having all traces of contaminant removed, may need to be disposed of safely. Such clothing may comprise special or hazardous waste. If incineration facilities do not exist at the site, the clothing may need to be bagged in suitable containers, stored within an identified temporary holding area before being delivered to the Local Authority or to a Hazardous Waste Contractor.

4.2 Oil Spills

Introduction

An oil spill can occur almost anywhere – a leakage or accident during transportation or during use, which can affect many areas including sea, coastlines, ports, harbours and land.

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Oil contains a variety of different types of hydrocarbons. The exact composition is dependent upon its origin. Oil may also contain a variety of impurities such as sulphur and nitrogen products. Generally oil is of relatively low toxicity; however this is dependent upon the properties of the source oil. The route of human exposure is via inhalation and skin absorption.

Oil when released in a spill will be subjected to various actions:

- Spreading
- Evaporation
- Oxidation
- Dissolution
- Emulsification
- Microbial degradation

The effect of all these actions is to reduce the original oil volume by evaporation but increase it by emulsification, also reduce its flammability and its toxicity. The rate of these actions is dependent upon the physical composition of the oil and environmental conditions prevailing at the time. Therefore to be able to effectively combat a spill these factors must be known.

Response to Oil Spills

Oil spill within the Dock Area

Oil spilled within the Dock Area will be recovered wherever possible using tier 1 equipment held by RoDMA. Personnel should be trained to MCA level 1, if necessary owners can mutually assist each other. In the event that a larger spill occurs it will be recovered and disposed of by the accredited contractor nominated in Section 10 who will be able to respond within 4-6 hours utilising equipment shown in Section 11. Waste arising will be legally carried for disposal by Adler and Allan. Consideration as to the effectiveness of the above will need to be taken into account and will depend on the tidal regime and the time of the spill.

Most small oil spills would be allowed to evaporate and disperse naturally. Where heavy concentrations were threatening a sensitive area, boats capable of sweeping the oil with booms will be mobilised. In order to reduce the amount of oil liable to impact the dock, collection and recovery would be undertaken.

Oil spill sampling

Samples of the spilt oil should be taken as soon as possible before the oil has weathered. These samples may be required as evidence in legal proceedings. Guidance in the matter of collection samples is given in MCA STOP Notice 4/2001.

4.3 Disposal Plan

All waste arising from an oil spillage will be handled systematically and strictly in line with the current Regulations. Policy and instructions are identified in Section 1.9. A waste disposal action checklist is shown in Part 2 Section 8.3.

Within the resources of the Plan, initial holding and storage will be possible through use of portable storage tanks as listed in Part 3 Section 11 and thereafter the oil will be disposed of using a local licensed contractor.

In the event of a tier 2 or tier 3 spill responses, the legal disposal of recovered oil will be undertaken, through a disposal route agreed with the EA, on behalf of RoDMA. This will be managed by the Dock's nominated oil spill contractor (Adler and Allan) duly accredited to Level 3 under the EA / UK Spill Association.

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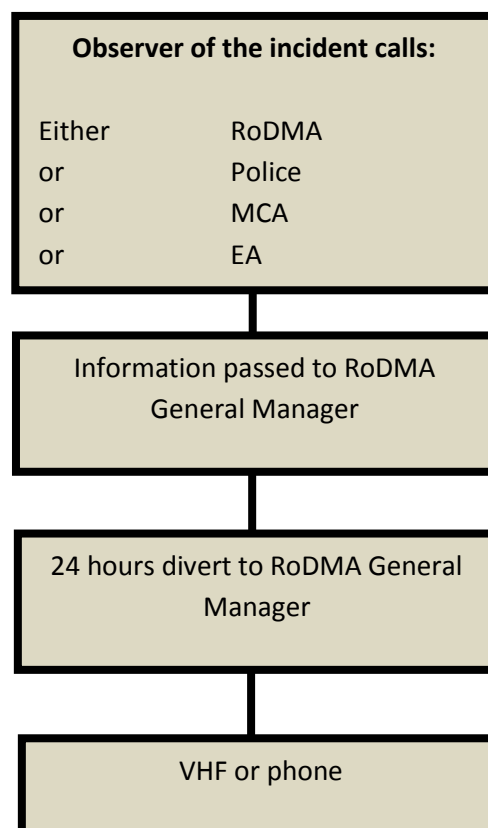
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Section 5: Actions Sheets

5.1 Observer of the Incident



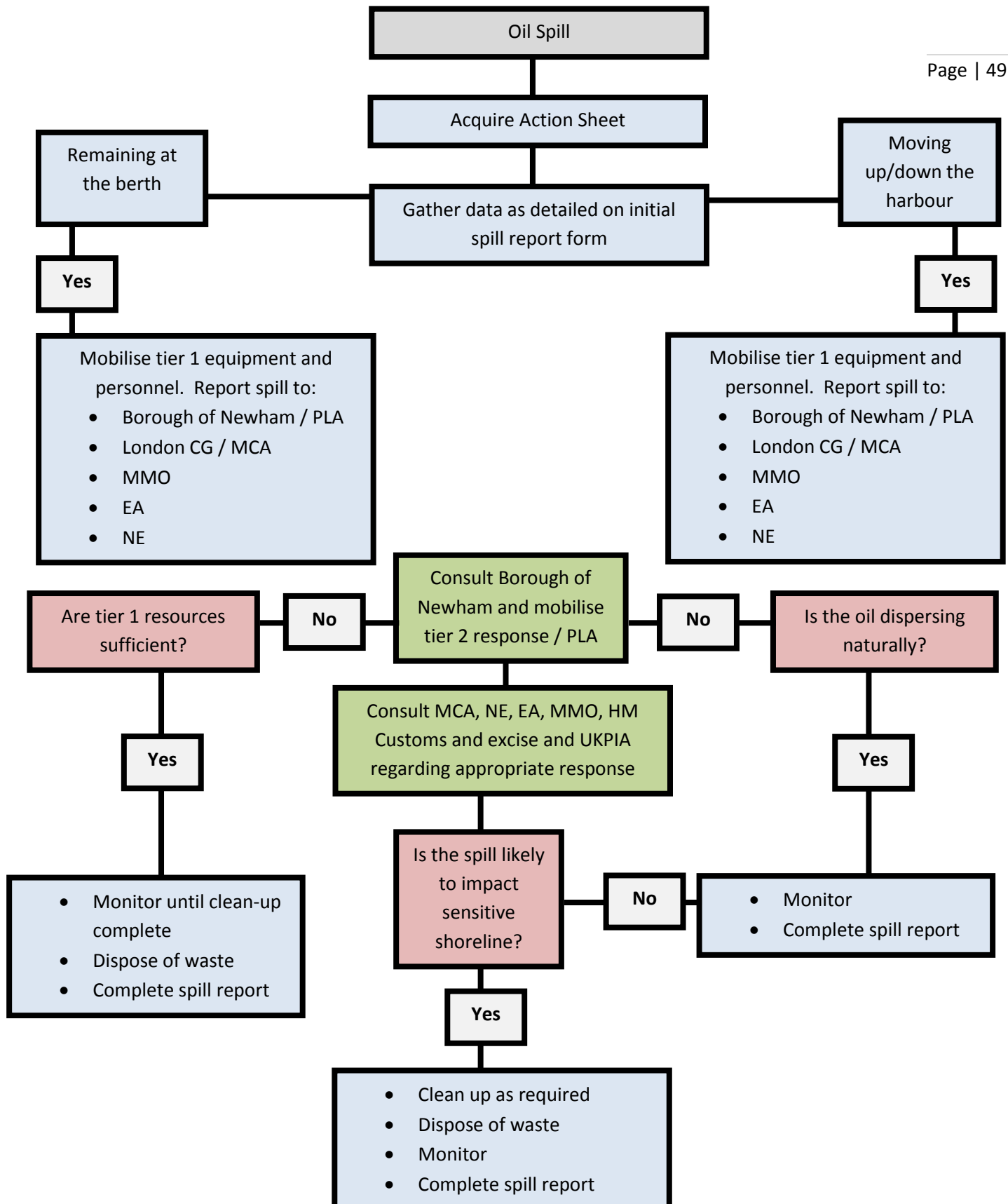
Information to be obtained as Initial Spill Report

Date and Time:
Name of person reporting incident:
Call back number:
Location of the Incident:
Estimated quantity of spilled oil: litres/tonnes
Type of oil spilled:
Action taken to prevent further spillage:
Other relevant information:
Contact Address:

5.2 RoDMA General Manager

Initial response upon notification of a spill

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Action Sheet

In the event of a call out requirement, the following action sheets should be used as a check list to ensure proper cover of all aspects of response.

RoDMA General Manager		
No	Action	Refer to
1	Obtain all available information regarding the spillage and ensure that an Incident Log has been started.	Incident log sheet section 8.1 - 8.2
2	Go to spill site to confirm the spill quantity and determine the initial level of manpower and equipment resource mobilisation required.	Tiered response Section 4.2 & 11
3	Attempt to contain the oil.	
4	Report the spill to the Borough of Newham, EA and NE.	
5	Contact London CG / MCA to inform them of spill in accordance with the notification matrix and inform them that the POLREP will follow in due course.	Statutory notification section 6.1 & 8.1
6	Fill in the POLREP Report Form and forward to MCA London CG for submission to statutory bodies.	POLREP Report form section 8.1
7	Call-out additional response personnel ensuring appropriate PPE is available.	
8	Ensure that a sample of spilt oil is taken, especially when the origin of the spill is unknown or legal proceedings are liable to be taken.	MCA STOP Notice 4/2001
9	Constantly monitor situation.	
Tier 2 and 3 Incidents		
10	Inform Borough of Newham, EA and NE of decision to mobilise Tier 2 response contractor.	
11	Set up Marine Response Centre (MRC) / Shoreline Response Centre (SRC) as appropriate. <i>N.B. A MRC would be set up by the MCA to deal with an oil spill which has occurred offshore, while the SRC would be set up to deal with an oil spill which has/may reach land.</i>	
12	Contact oil spill response contractor and agree primary level of response required.	Resources directory section 11
13	Start and maintain an accurate log of all communications with the oil spill response contractor.	
14	Establish communication link with the oil spill response contractor duty manager and issue a call back number.	

15	Determine extent of incident in terms of: • Casualties • Safety hazards • Damage to facilities • Pollution extent • Result of any action taken so far	
16	Brief oil spill response contractor site supervisor of actions as appropriate.	
17	Establish review/planning meetings. Continue normal communications and ad-hoc reporting.	
18	When incident stood down, confirm incident closure with all agencies involved.	
19	Complete incident log and ensure receipt of report from response supervisor.	

Escalation of Response

In the event that a response escalates to tier 2 or tier 3, sufficient personnel must be mobilised to establish an incident centre and a room must be made available to meet with personnel from external agencies. The RoDMA General Manager will retain the position of On-Scene Commander unless any change is agreed with the Government Agencies involved. If the response is likely to become protracted, the RoDMA General Manager must make arrangements for the incident centre to be managed and run according to the needs of the response team. This may entail providing catering and accommodation arrangements locally. In the event that outside contractors are employed to assist with the clean-up, due notice must be taken of the Health and Safety Policy contained in Section 4.1 of this Plan.

In the event of an incident requiring salvage operations the Secretary of State's Representative (SOSREP) will decide whether it is necessary to set up a Salvage Control Unit (SCU). If the size of the incident merits the establishment of a SCU, Borough of Newham Oil Pollution Officer will initiate the establishment of the SCU and the SOSREP will travel to the scene at the appropriate time. Upon establishment of a SCU the RoDMA General Manager will become an active member of the SCU team liaising with the SOSREP throughout the course of the incident. The members of the SCU are:-

- SOSREP;
- Salvage Manager from the salvage company appointed by the ship-owner;
- RoDMA General Manager or nominated representative;
- Single representative nominated by agreement between the ship-owner and the insurers (for both the physical property and their liabilities);
- CPSO
- Environmental Liaison Officer, nominated by the Chair of the Environment Group; and

- if SOSREP decides to appoint one, SOSREP's personal salvage advisor.

Under the OPRC 1990 the SOSREP has the powers to establish an environmental group where Appointed Environment Liaison Officers (ELOs) will provide environmental and public health advice to the response centres and the relevant authority.

Section 6: Communications

6.1 Notification Matrix

Organisation	Oil spill tier			For contact numbers, see section 10 – Contact directory	
	1	2	3	Method	Remarks
RoDMA	t	t	t	telephone	
MCA / London CG	t/f	t/f	t/f	telephone and fax	Coastguard will require information on the oil spill report form in section 8.1. Confirm detail with fax.
NE	email	t/f	t/f	telephone and fax	Fax all spills. Contact if spill exceeds one tonne.
EA	t/f	t/f	t/f	telephone and fax	Contact if spill has originated from land based source. Confirm by fax.
MMO	t/f	t/f	t/f	telephone and fax	
Borough of Newham	t/f	t/f	t/f	telephone and fax	
Adler & Allan		t/f	t/f	telephone and fax	Contact the 24 hour contact number and ask for the duty manager.

t: notify immediately by telephone

f: notify immediately by fax

 notify during normal working hours

6.2 Communication and Reporting

Reporting of Oil Pollution

It is essential that all spills are reported by whatever means as quickly as possible.

- a) Responsibility for reporting of oil pollution rests with the Master in all cases involving a vessel and with the berth Operator in the case of a berth or quayside incident. In cases involving a vessel alongside both parties are equally responsible.
- b) Any person either ashore or afloat, seeing oil pollution on the water within the Dock Authority's jurisdiction or liable to pose a threat to it, should report it whether or not the source is known (section 5.1).
- c) The RoDMA General Manager is responsible for ensuring mandatory notifications are made (section 3.6).

Communication

Being a small-scale operation, and with the limited number of persons involved, initial reports will be passed by telephone, primarily landline. Should personal mobile phones be used consideration must be given to security level. In the event of escalation primary communications will be augmented with assistance from other agencies.

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In the event of a clean-up operation a shift system will be instituted to ensure the main switchboard is manned on a 24 hour basis.

Records

It is essential that all events occurring during an incident are logged and recorded (sheet shown in Section 8.2). This will provide assistance if liability, compensation or reimbursement issues arise as a result of the incident. To achieve this, all key personnel should keep logs.

Entries in the log should detail as a minimum, events, actions taken, communications with outside Agencies, decision made and points relevant to the operation.

These logs should be forwarded to the RoDMA General Manager once the incident has ended to form part of the final incident report and provide the basis for a “wash-up” meeting.

Section 7: Sensitivity Areas Response Information

7.1 General Information

There is only one sensitivity issue related to the dock, two aquatic bird rafts provided in Pontoon Dock which promotes Arctic Tern breeding in the month of April.

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The docks are designated as a protected site of nature conservation interest on the London Borough of Newham UDP.

Recommendations: use booms to prevent oil from entering the Pontoon Dock site. No dispersant to be used and manual collection of tar balls and other oily debris is recommended.

7.2 Tidal Data

The docks are locked with gates. Tidal movement is static at these times. Wind driven movement will only occur.

Section 8: Report Forms and Checklists

8.1 CG77 POLREP Pollution Report Form

To: MCA, London – MRCC Copy to: Agencies as required From: RoDMA

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Part 1 – Information which should be provided in an Initial Pollution Report	
Classification of report: <i>(*delete as necessary)</i> *doubtful *probable *confirmed	
Date: _____ Time pollution observed: _____ Identity of observer/reporter: _____	
Position of pollution: <i>(latitude/longitude, range and bearing from prominent point of land)</i> Extent of pollution in litres/barrels/tonnes: Size of polluted area: <i>(Estimated amount of pollution, e.g. size of polluted area, number of tonnes of oil spilled; or number of containers, drums, etc. lost. When appropriate, give position of observer relative to pollution).</i>	
Wind speed (knots): _____ Direction from: _____ Tidal status at time of pollution observation (after/before HW/LW): _____	
Weather: _____ Sea state: _____ Wave height (metres): _____	
Characteristics of pollution: Type: <i>(crude, diesel, garbage, etc.)</i> Appearance: <i>(liquid, solid, sludge, etc.)</i>	
Source of pollution: <i>(from vessel or other)</i> Cause of pollution: _____ <i>(Apparent deliberate discharge or casualty. If the latter, give a brief description. Where possible name, type, size, nationality and Port of Registry of polluting vessel. If vessel underway, give course, speed and destination if known)</i>	

Detail of vessels in the area:

(To be given if the polluter cannot be identified and the spill is considered to be of recent origin)

Photographs taken: *(*delete as necessary)* *yes / *no

Sample taken for analysis: *(*delete as necessary)* *yes / *no

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Remedial action taken / intended to deal with spill:**Forecast of likely effect of pollution:**

(e.g. arrival on coastline with estimated timing)

Names of those informed other than addresses:**Any other relevant information:**

(e.g. names of other witnesses, references to other instances of pollution pointing to source)

Part 2 – Supplementary information to be provided later

(this part may be disregarded when POLREPS are for UK internal distribution only)

Results of sample analysis:**Results of photographic analysis:****Results of supplementary inquiries:**

(e.g. Inspection by surveyors, statements from ship's personnel, etc. if applicable)

Results of mathematical models:

8.2 Incident Log Sheet

[illegible]

8.3 Waste Disposal Action Checklist

Oily Waste Generated from a Shoreline Clean-up Operation

a) Direct Transportation to Appropriate Disposal Site for Burial

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1. Identify suitably licensed waste carrier to remove material from site.
2. Confirm with waste carrier the disposal route and ultimate disposal site. Liaise with EA to ensure that the disposal strategy is acceptable.
3. Ensure all associated paperwork, i.e. consignment notes, are retained and catalogued.
4. Ensure all associated paperwork is retained and catalogued.

b) Temporary storage/Clean, Treat, Stabilize, Recover, Reuse

1. Discuss requirement to establish temporary storage sites along the shoreline with EA, the Local Authority and the NE.
2. If agreed, identify temporary storage sites in close liaison with EA, NE and Local Authority.
3. Instruct Oil Spill Response Contractors to construct temporary storage sites. Area to be isolated, outlets and drains plugged, membrane laid, bunded area created, skips set or lagoons lined.
4. Identify suitably licensed waste carrier to remove material from site.
5. Confirm with waste carrier the disposal route and ultimate disposal site.
6. Ensure all associated paperwork, i.e. consignment notes, are retained and catalogued.

c) Temporary Storage and then to Appropriate Disposal Site for Burial

1. Discuss requirement to establish temporary storage sites along the shoreline with EA and the Local Authority.
2. If agreed, identify temporary storage sites in close liaison with EA and Local Authority.
3. Instruct Oil Spill Response Contractors to construct temporary storage sites. Area to be isolated, outlets and drains plugged, membrane laid, bunded area created, skips set or lagoons lined.
4. Identify suitably licensed waste carrier to remove material from site.
5. Confirm with waste carrier the disposal route and ultimate disposal site. Liaise with EA to ensure that the disposal strategy is acceptable.
6. Ensure all associated paperwork, i.e. consignment notes, are retained and catalogued.

d) Take to a Refinery/Incinerator (mainly for oily liquids only)

1. Identify suitably licensed waste carrier to remove material from site.
2. Identify suitable facility to receive waste.
3. Confirm with waste carrier the disposal route and ultimate disposal site. Liaise with EA to ensure that the disposal strategy is acceptable.
4. Ensure all associated paperwork, i.e. consignment notes, are retained and catalogued.

Oily Liquids Recovered at Sea and Held on a Dedicated Oil Recovery Vessel

1. Notify HM Revenue and Customs that you intend to land recovered oil.
2. Identify suitable oil handling plant (refinery) to receive the waste.
3. If 2 is not available identify a harbour with a suitable berth for handling oils.
4. Identify a suitably licensed waste carrier to take the oily liquids off the vessel.
5. Confirm the disposal route with the waste carrier.
6. Notify Regulator and confirm that the identified disposal route meets with their satisfaction. Ensure all associated paperwork, i.e. consignment notes, are retained and catalogued.
7. The removal of landed ships waste that is Hazardous Waste to:
 - a. conveyance for transport outside the harbour area.
 - b. reception facilities within the harbour area.
 - c. by pipeline to reception facilities outside the harbour All require to be consigned. However, there is no requirement to pre-notify these movements and consignment notes can be SC coded.
 - d. all oil wastes including fuels, mixtures, emulsification and spills are classed as Absolute Entries in terms of the regulations therefore there is no longer any percentage threshold of carcinogenic compounds; they are now Hazardous Waste regardless. All waste oils with the exception of edible oils are considered Hazardous Waste irrespective of their composition, biodegradability, synthetic nature or otherwise. There is no longer any threshold applicable to consider whether they are Hazardous Waste or not.

Notify Regulator and confirm that the identified disposal route meets with their satisfaction. Ensure all associated paperwork, i.e. consignment notes, are retained and catalogued.

Section 9: Press and Public Information

9.1 Press Statement

In the event of a pollution incident, it will be necessary for an efficient and comprehensive information service to be brought into action so as to:

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- Deal professionally with the representatives of the media.
- Co-ordinate and release information to the general public regarding the pollution incident and the RoDMA response to it.
- Keep Staff and involved personnel informed of developments regarding the progress of the incident; in so far as it affects their responsibilities.
- Minimise the pressures on those directly concerned with combating the spill.

Responsibility for media relations needs to be clearly understood and who will be required to respond.

For guidance it would be expected as follows:

- Tier 1 spill – RoDMA involvement only.
- Tier 2 spill – Local Authority and RoDMA involvement.
- Tier 3 spill – SRC established with MCA Press Office staff in attendance.

It is essential that the media are provided with a “balanced” view of the incident and actions taken. Remarks like “No comment” only increase rumour and fuel unnecessary speculation. Below is the format of an Initial Press Statement that could be used by a responsible RoDMA Manager pending full details becoming available and a press release issued.

Mike Luddy (RoDMA Managing Director) is the identified press liaison person for RoDMA, all enquiries would be routed to Mike via the RoDMA telecommunication system.

Initial Press Statement

“RoDMA confirm that an incident has occurred (state where and give brief description)
at approximately (give time)hours today.

Emergency response procedures have been initiated and relevant authorities (have been / are being) advised. All support services are being co-ordinated through the Authority’s incident response team and every possible effort is being made both to minimise risk to personnel at the scene and to contain and mitigate any effects.

Further information will be released, (as it becomes available) at a press conference scheduled for time today.”

Part 3: Data Directory**Section 10: Contact Directory**

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Section 11: Resources Directory

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Section 10: Contact Directory

Company / body name	Contact	Telephone (office hours)	Telephone (out of hours)	Email
MMO	Spill Response	0300 2002024	0300 2002024 Mon - Fri 24 Duty Officer - 07770 977825	dispersants@marinemangement.org.uk Daytime enquiries (not incident) Katherine Morton 0208 026 5325
Borough of Newham				Switchboard: 020 8552 9587
EA	Emergency	0800 163300	0800 163300	ics@environment-agency.gov.uk
HM Revenue & Customs (HMRC)	Main National Co-ordination Unit Advice Line	08707 853600	08707 853600	ncu@hmrc.gsi.gov.uk
RoDMA	MD Ops Manager Marine Team Security 24 Hrs	020 7511 5086 07788 454841 07788 454842 07788 454843 07720 636902	07971 617262 07711 300132 07788 454841 07788 454842 07788 454843 07720 636902	Mike Luddy Scott Derben Trevor Boreham Steve Gilbert Mick Pace
London City Airport	Airport Duty Manager	020 7646 0241	More to add	
PLA	Thames Barrier PLA Harbour Master TOSCA Duty Controller	020 8855 0315 020 7743 7900 020 7743 7946 01474 560311 01474 562215	01474 560311 01474 562215	tbncdo@pla.co.uk
Vacuum Tanker	Cleanaway Domestic waste Thames tank cleaning services	020 7223 8393 01707 651982 01708 891313	020 7538 4526	
Skip hire	Skip in time	020 7511 912		
MCA / London CG		020 8312 7380	020 8312 7380	wm.lndn@mcga.gov.uk london.coastguard@mcga.gov.uk
MCA Southampton	Counter Pollution	02380 329407 Daytime Only	Contact as above	andrew.Healy@mcga.gov.uk

	Salvage Officer – Andrew Healy		020 8312 7380	
Natural England	Kevin Cook Marine Incident Emergency Contact	03000 601316/1200		marineincident@naturalengland.org.uk
Police	North Woolwich	020 7474 1212	999	
Spill response contactor Tier 2				
Adler and Allan	24 hour emergency line	0800 592827	0800 592827	n/a

Section 11: Resources Directory

Tier 1

RoDMA have limited tier 1 resources located at the docks, these stocks would be pooled if necessary. Personnel are available to deploy the kit. Out of normal working hours (07:00 – 16:00) RoDMA staff has a recall of 30minutes initially, and then 4.0hours with x3 trained personnel to MCA2P level. There is x1 person trained to MCA4P level.

No.	Description
1000	Spill mats in packs
4	Absorbent sausage 3.0m booms
2	Absorbents cushion packs
n/a	Granules
n/a	XXXL paper suits, latex gloves, paper masks, safety glasses
1	Permanent 27.0m boom
2	Oil spill pad packs
5 sets	Hard hats / gauntlets / coveralls / safety glasses / safety shoes / lifejackets

Tier 2

These resources will be available from Adler & Allan Limited, on a call out basis. During working hours the reaction time to scene is <4.0hours, out of working hours the reaction time to scene is <6.0hours. All areas needing to be cleaned will be undertaken by Adler and Allan. The PLA would also be informed if the incident developed into a tier 2 situation.

No.	Description	
	Vehicle	7.5tonnes
	Inshore skimmer	Portable weir skimmer and hoses (minimax)
	Pumps	Spate pump 3"
	Oil storage	Fastank – 2000gallons
8	Shore sealing boom	Inflatable Silverbeach 10m 550
8	Inshore fence boom	Rigid fence boom 10m (50P boom)
8	Inflatable sea boom	Silverboom 20m 75i
4	Inflatable sea boom	Silverboom 10m 75i
	Inflatable boom	Air fan – echo PB6000
	Inflatable boom	Air fan – echo PB2400
	Shore sealing boom	Water pump – Honda WP20X
8	Inshore boom	Bruce anchors
	Inshore boom	Tripping buoys
	Inshore boom	Connectors and lines
	Inshore boom	Anchor chains
	Decontamination equipment	n/a
	Sorbents	Booms and pads, various
	Inflatable vessels	Yamaha 2.65S
	Outboard motors	Mariner 4S
	Generator	Belle Minigen 2000 – Honda EC4000B
	Portable lighting	Twin floodlight 500w 110v
	Medical equipment	First aid kit
	Ancillary equipment	Toolkit
2	Fire fighting equipment	Powder 2kg
	Spare PPE container	Basic consumables
3	Grab bag	Personal safety and communications

Tier 3

Tier 3 Response resources from the MCA. The response will be in accordance with the National Contingency Plan.

During a protracted long running incident, RoDMA would coordinate a 12hour shift rotation for their immediate staff and offer services on site such as kitchen, dining, various meeting rooms and local hotels and further dining facilities.

Appendix I: MCA STOp Notices

Scientific, Technical and Operational Advice Note

STOp4/2001 - Important

This STOp notice replaces STOp 2/98; please destroy your copy of STOp 2/98

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Advice to Local Authorities on the Collection and Handling of Oil Samples

1. Background
2. Sampling from the sea and shoreline
3. Size of samples
4. Methods of collecting samples
5. Bottling, sealing, packaging and boxing of samples
6. Labelling and addressing of samples
7. Transportation of samples
8. Handling of samples for Bonn Agreement States

Appendices

Appendix A: Oil Pollution Sample – Standard Label

Appendix B: Collection of Sample – Standard Form

Note: This document should be read in conjunction with:

- STOp 1/2001 - The Environment Group and Maritime pollution response in the UK.
- STOp 2/2001 - The Establishment, Management Structure, Roles and Responsibilities of a Shoreline Response Centre during a Maritime Pollution Incident in the United Kingdom.
- The National Contingency Plan for Marine Pollution from Shipping and Offshore Installations (NCP).

All extant MCA STOp notices may be found on the MCA web site: www.mcga.gov.uk and all enquiries regarding this and other MCA STOp notices should be directed to meor meor@mcga.gov.uk

1. Background

Where an oil pollution incident is thought to have arisen from an illegal operational discharge an effort should be made to collect a sample of the pollutant and, if possible, matching samples from the suspect ship or other source for analysis, comparison, and possible subsequent use in legal proceedings. Samples of the pollutant may need to be taken from the sea or coastline. When beach pollution has occurred, local authorities or HM Coastguard would usually take the necessary samples. For advice on sampling at sea, contact the Counter Pollution Branch of the Maritime and Coastguard Agency (MCA) on 02380 329483. This notice sets out the procedures to be followed when collecting and handling oil samples.

The MCA's Enforcement Unit will collect evidence concerning pollution incidents from shipping at sea, upon which a decision will be made as to prosecute or not. In England, Wales and Northern Ireland the MCA will conduct prosecutions. In Scotland the case will be presented to the Procurator Fiscal for action. If samples are likely to be used in connection with legal proceedings then the following procedures should be implemented:

In England and Wales

Although a single sealed sample of each type of pollutant is required by law, MCA would prefer three samples to be collected.

In Scotland

There is no longer a legal requirement for three sealed samples of each type of pollutant in Scotland but as in England MCA recommend three samples: one for analysis, a second to be handed to the owner or master of the suspect vessel for retention and any appropriate action, and the third for production in court, where the prosecution will be handled by the local Procurator Fiscal.

In Northern Ireland

Although the law in Northern Ireland concerning this matter is the same as that in England and Wales, the Director of Public Prosecutions, who is responsible for handling prosecutions in Northern Ireland, has asked that for the sake of safety, three sealed samples of each type of pollutant should be provided on the same basis as in Scotland.

Responsibility for the collection of oil samples in Northern Ireland rests with Environment and Heritage Service, Department of the Environment (Northern Ireland).

Samples will usually be requested by a scientist/mariner in the MCA's Counter Pollution Branch or one of the Principal Counter Pollution and Salvage Officers as part of the response to a reported incident. Once a sample has been taken, agreement must be obtained from the Counter Pollution Branch before it is analysed

Please remember that analysis of samples will only be carried out and paid for by the MCA if authorised by the Counter Pollution Branch. Please note that organisations such as Ports and Harbours or the Environmental Regulator may be taking independent samples as part of their own individual responsibilities for oil spill response and pollution regulation. The analysis of the samples and the cost of analysis of such samples will be the responsibility of the organisation taking the sample and not the MCA.

2. Sampling from the sea and shoreline

When a large oil slick exists at sea or on a coastline, the number of samples that MCA may require is:

offshore spill - minimum of 1 sample / slick / day where possible,

onshore spill - representative samples from the shoreline, following discussion with Counter Pollution Branch.

Following an incident, attempts may be made to infer that not all the oil pollution came from one vessel, and that some of it may have come from other sources. Where therefore an oiled beach is being sampled, a careful and detailed examination of the beach should be made to determine the uniformity of the oil deposit and the extent to which it is polluted by more than one type of oil. In particular, if there are any tarry, semi-solid lumps or wet tarry patches, their presence should be recorded and some idea of their quantity and extent obtained. In addition, samples of such pollution should be retained and an attempt should be made to estimate costs expended on the clean-up of different oils.

In cases where samples have been taken at intervals along the beach, these should be clearly identified (see section 6 on labelling). It is desirable that samples of oil are taken in the area where the oil is first washed ashore. This is helpful since the fresher the oil the easier it is to identify by laboratory techniques.

3. Size of samples

Modern analytical methods mean that very little original pollutant is required to carry out most analyses. However, a larger sample is likely to be more representative. Detailed analyses are often hampered by either contamination or the loss of the oil's lighter fractions. A larger undisturbed sample may consist of a weathered oil crust covering a less weathered (holding a greater percentage of lighter fractions) and therefore more valuable sample. The recommended minimum quantities required for a detailed programme of analyses are:

- Unweathered oils that are liquid and substantially free of water, 10ml
- Oil exposed to seas surface and forming water-in-oil emulsion "chocolate mousse", 10ml
- Over side water discharge where contravention of 100ppm or 15ppm is suspected, 1 litre of the discharge.
- Tarry lumps as found on beaches, 10 grams.

A sample should not be withheld because the recommended quantity cannot be obtained, since much smaller samples can give useful results. In cases of pollution within UK territorial waters, when it is only necessary to prove that some oil has been discharged, a relatively small sample may be acceptable. Larger samples may be useful to carry out a range of tests to determine the most appropriate response/clean-up strategy. MCA can advise when and why such an approach is desirable

4. Methods of collecting samples

When liquid samples are skimmed off the surface of the sea, care should be taken to ensure that the sample contains sufficient oil. Various techniques may be adopted to skim thin layers of oil from the waters' surface and consolidate using a bucket with a hole.

Care should be taken to minimise contamination of liquid samples by solid matter. Oil deposited on rocks or other impervious materials should be scraped off and placed directly into the sample container. Lumps of tarry or waxy pollutant should be placed directly into sample containers; no attempt should be made to heat or melt these samples to enable them to flow into a container. The sample container should be sealed as soon as possible to minimise evaporation of the higher fractions.

Oil adhering to seaweed, small pieces of wood, sand, plastic, material, cloth, vegetation or other debris should be dealt with by placing the complete specimen comprising oil and support material into the sample container.

5. Bottling, sealing, packaging and boxing of samples

All samples should be securely packed and sealed, using screw topped containers and UN approved fibreboard boxes to ensure safe carriage of the sample. These have been supplied to HM Coastguard Stations and MCA Marine Offices for use by MCA Staff. In consultation with CPB, MCA sampling bottles can be made available to local authorities.

As proof against unauthorised opening, the sample container should be sealed with wire and a lead or sealing wax seal. Alternatively, adhesive labels with a signature stuck on the bottle top in such a way that they have to be broken to open the bottle are acceptable.

The bottle should then be placed inside a plastic bag, which should be sealed with a further adhesive label in the same way as for the sample bottle to ensure that it is not tampered with.

If it is necessary to take an oil sample where one of the standard containers above is not available the receptacle should be of glass with a screw-cover and a seal which would not be affected by the oil. Small (100ml) and medium (500ml) glass bottles are readily obtainable from chemists or hardware shops.

The use of closed metal receptacles or plastic jars is strongly discouraged as contact with metal or plastic can, in some cases, interfere with the analysis. Avoid the use of any metal tool made of nickel or vanadium based alloys, as these metals occur naturally in crude oils and refined products and their levels may assist in the identification of the oil source.

When boxing the sealed samples for transport, the Peters and May (Dangerous Goods) Ltd, packing instructions should be followed, to ensure the integrity of the package for transport under Dangerous Goods regulations. Vermiculite should be used to surround the sample(s) in the box for added protection and to absorb any possible seepage. Make sure that the dangerous goods documentation is completed.

Whenever possible, samples should be stored in refrigerators or cold rooms at less than 5 degrees C in the dark. These precautions are particularly important for samples containing water or sediment, but less so for bulk oil samples.

When ordering sample bottles it is important to consider the following:

- Wide necked bottles make sampling easier.
- Sample security can be achieved with locking cap seal.
- Ensure that no components of the bottle can interfere with analysis, e.g. waxed cap inserts.

6. Labelling and addressing of samples

Care should be taken to ensure that every sample bottle is not only suitably sealed but also clearly labelled before being submitted to the MCA for analysis. It is important that a sample is positively identified, particularly where more than one is taken during an incident. It is of vital importance to maintain continuity in the chain of evidence. MCA recommend that each sample is labelled and is accompanied by more detailed information set out on a standard proforma. The form accompanying each container should therefore provide the following details:

- a. An identifying number; year 2 digits
 month 2 digits
 day 2 digits
 and the initials of the official in charge of taking the samples. For example 02/04/17/JS =
 Sample taken on 17th April 2002 by John Smith
- b. Description of sample
- c. Position from which sample was taken, grid reference if possible.
- d. Date and time of sampling.
- e. Purpose for which sample was taken.
- f. If known, suspected source, e.g. name of tanker or ship.
- g. Whether or not dispersants have been used and, if known, their type and make.
- h. Method of sampling (description of sampling device and any possible contamination).
- i. Name, address and contact details of person taking the samples and of anyone witnessing the taking of it.
- j. Wind direction and velocity.
- k. Air and water temperature.
- l. Sample descriptions, i.e. viscosity, colour and contaminants.
- m. Description of the oil spill, i.e. distribution and consistency.

An example of the recommended oil pollution sample standard label can be found in Appendix A. The recommended sample form is at Appendix B.

To assist with any subsequent investigations it is important that a letter is sent to MCA quite independently of the sample (but a copy should be sent with the samples), setting out details a. to m, where available.

7. Transportation of samples

If a sample needs to be analysed, the Counter Pollution Branch will contact their contractor to arrange for the sample to be collected by courier and analysed.

Please ensure that samples are labelled correctly and securely packed in UN approved boxes to avoid breakage. It is important that the standard proforma described in section 6 should also be included with the sample along with all carriage documentation. To facilitate sample transportation, clear information on the number of samples to be collected, the location they need to be collected from and a contact name and phone number must be given to Counter Pollution Branch.

8. Handling of samples for Bonn Agreement States

In cases where samples are taken at the request of a contracting member of the Agreement for Co-operation in Dealing with Pollution of the North Sea by Oil, the BONN Agreement, the Counter Pollution Branch would be the focal point for processing the samples for either analysis or onward transmission to the requesting member state. The results of such tests would not be made public until the contracting party involved was informed.

Appendix A: Oil pollution sample – standard label

OIL POLLUTION SAMPLE – STANDARD LABEL			
ID No.	Date/time	Location	Name and address of sampler
For continuity of evidence: Please complete clearly.			
Sample passed to:			
Date	Name	Address	Signature

Appendix B: Oil Pollution Sample – Standard Form

Collection of oil samples - This form to be completed by person taking sample If in doubt please refer to MCA STOP Notice on sampling. Remember to complete sample jar label and sign	
A	ID Number - YY/MM/DD - with initials of person taking sample
B	Sample description
C	Location of sample – OS Grid Ref or Lat/Long if possible
D	Date and time of sample collection
E	Purpose for which sample was taken
F	If known, suspected source
G	Were dispersants used?
H	Method of sampling (device?)
I	Name, address, e-mail address & Tel No of person taking sample and any witnesses
If possible the following information would also be helpful	
J	Wind speed and direction
K	Air and Sea Temperature
L	Sample description, viscosity, colour, any contaminants?
M	Description of the oil spill, distribution and consistency
Original form to be kept with sample - please send copy of the form to the Counter Pollution Branch of the MCA - Bay 1/11, Spring Place, 105 Commercial Road, Southampton, SO15 1EG Tel:023 8032 9485	

Appendix II: MCA Exercise guidelines

OPRC Plans – Exercises – MCA Guidance

The following provides guidance on planning and conducting exercises which have been designed to evaluate the contingency plan and include a degree of training for any personnel likely to be involved in an oil spill incident.

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Each port / harbour / oil handling facility must participate in exercises in accordance with the provisions within their OPRC Compliant Oil Spill Contingency Plan.

The objectives of any exercise need to be pre-agreed, enabling the exercise planners to tailor the exercise to the needs of the players. For example, it may be desirable for different aspects of the plan to be exercised separately such as notifications or equipment mobilisation / deployment. A larger exercise, encompassing all aspects of the response, may not explore the detail of each of these individual themes but will help promote a wider understanding of the purpose and scope of the whole plan. Whatever the scale or type of exercise, the invited participation by the appropriate environmental and regulatory authorities, and others, will aid the collective understanding of the plan, to the benefit of all involved.

The following list gives examples of exercise types that can be undertaken.

Notification Exercise – announced or unannounced

Used to test alert and call-out procedures for response teams, test communication systems, availability of personnel, evaluate travel options and arrangements and test the transmission of information. Such an exercise can be used to check the validity of contact information within the plan and should be carried out at least twice per year.

Mobilisation Exercise

May be used to test the actual mobilisation times of individuals and contracted resources. Ideally mobilisation should be tested without prior warning, although the requirement for an unannounced callout will need to be balanced against the practical difficulties and financial penalties of doing so. Whilst this important aspect of the response may be exercised in isolation, it may be seen as beneficial to incorporate this as a specific objective within the scope of another of the framework exercises.

Desktop Exercise

Whilst the degree of complexity can be decided upon by the exercise coordinator, a table-top exercise can be used to test the emergency management knowledge and capability. It provides individual and also team training, enabling personnel to be familiarised with the various roles and responsibilities and identification of resources. A table-top exercise can also explore the interaction between the different parties involved, particularly by testing the principles of the response strategies. These exercises can be used to test coordination with local authorities and the emergency services. Some

organisations, which have peripheral responsibilities, may be role-played. During this exercise the capability to respond to a tier 2 type spill and initiate the primary actions in the event of a Tier 3 response can be put to the test. As discussed above, it can be effective to combine this exercise with an equipment mobilisation / deployment exercise, but in any case a table-top exercise of the incident management structure should be incorporated within the exercise programme at least annually.

Incident Management Exercise (require significant planning)

These exercises can test the capability of local teams to respond to tier 1, tier 2 and tier 3 type incidents, providing experience of local conditions and spill scenarios, enhancing individual skills and teamwork, integrating the roles of external bodies and organisations. **MCA considers that each port, harbour and oil handling facility must hold an Incident Management Exercise, incorporating equipment deployment to a Tier 2 level at least every three years**, following initial plan approval. This is likely to incorporate, or be combined with a Tier 1 equipment deployment. Such exercises need, so far as possible, to involve actual involved organisations to represent a real emergency. However, if this cannot be achieved, role-playing personnel can be used to simulate roles and responsibilities.

A Balanced Programme of Exercises

Different types of exercises will test different facets of the plan whilst even the most ambitious Incident Management Exercise cannot be expected to test every aspect of the plan. Notification exercises, which are useful to update contact details within a plan, should be undertaken with greater frequency than equipment mobilisation exercises, for example. Before an exercise takes place, the appropriate authorities should be notified. This notification procedure should be formally documented and a copy of this documentation held and logged within the port / harbour / oil handling facility.

A typical programme of exercise frequency is as follows:

Exercise type	Frequency
Notification and tier 1 mobilisation exercises	Twice per year (2 of each per year)
Table top exercise (may incorporate mobilisation and deployment of local response equipment)	Once per year
Incident management exercise (IME) (will incorporate mobilisation and deployment of resources up to Tier 2 level)	Once every 3 years
<i>In an instance where a port, harbour or oil handling facility considers this requirement to be unduly onerous on the basis of the risk assessment, they may submit an alternative exercise programme to the Regional CPSO for consideration and approval, on an individual basis. In some circumstances it may be permissible to undertake an Incident Management Exercise in the fourth year of the plan's five-year life-cycle providing for the 'lessons-learned' to be captured within the final plan review/update year.</i>	

Sharing of exercises

In a situation where a group of ports and harbours within a distinct geographic region and sharing the same Tier 2 contractor, there may be scope to undertake a joint exercise at one of the ports. Key individuals from nearby ports could be invited to observe or participate, thus gaining from the experience of the hosting port. In any case, each plan holder must host their own exercise involving mobilisation and deployment of their Tier 2 response, at least every three years.

A post exercise/incident form should be completed and forwarded to the Regional CPSO, and all relevant plan holders, each time an exercise is carried out.