

Environmental Procedures

Airside Operational Instruction 24
Applicable to Airside and Landside Spillages

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AOI Owner – Airfield Operations

SECTION 1 – RESPONSE & REPORTING OF SPILLS

1.1.1 All spillages must be reported without delay to Operations Control Room (OCR) on **Ext. 3333** or **01332 818555** giving details of:

- i. the name and company of the caller
- ii. location (to include landside or airside)
- iii. type of spillage (fuel, oil, other)
- iv. quantity if known
- v. a description of what happened
- vi. has the spillage reached a drain line?
- vii. any immediate action taken

1.1.2 The Operations Control Room will mobilise RFFS to attend the scene and assess the situation. Should further assistance be required from internal departments the Incident Commander (IC) shall make the request via the appropriate channels and be in liaison with the OCR.

1.1.3 The IC will maintain operational authority of the scene; the IC can delegate this authority to the most appropriate department/personnel for continued monitoring/clean up.

1.1.4 All persons involved, witnesses, vehicles, plant, and equipment should not be moved until the airport authority attends the scene.

1.1.5 If in the judgement of the senior person present or the IC of the RFFS that their removal is necessary in the interests of safety or to affect a rescue, they may be removed from the scene. The scene should be digitally photographed before being disturbed. It will be the responsibility of the AOS, for the investigation of airside spillages.

1.1.6 RFFS response may affect the Fire Category. This decision will be made once a scene assessment has been taken by the Officer in Charge (OIC).

RESPONSIBILITIES

ADM

- The Airport Duty Manager has responsibility to take information from the Control Room (CR) and where required or on request, action the third-party spill response.
- The ADM has overall responsibility of communications via CIM upon instruction to the CR.
- In the event of reduction in the RFFS fire category, consideration will be given to the communication of the reduction.
- The ADM is responsible for initiating landside spill investigations via CAMMS

AODM

- The Airfield Operations Duty Manager (AODM) has responsibility for the monitoring of spillages airside by the Airfield Operations department and initiating spill response as required.
- The AODM is to liaise with the RFFS IC on scene to assess, evaluate a plan to contain and clear up the area.

- The AODM has responsibility for all spillage investigations airside, including small spillages that will be recorded on CAMMS and significant spillages that will be recorded on TOKAI as a Mandatory Occurrence Report in line with CAA CAP382.
- Airfield Operations are responsible for investigating all spillages on CAMMS and assigning actions as required.
- Airfield Operations have overall responsibility in deeming areas fit for normal operations post spill clean up and initiating closures on the movement area following a spill that may degrade flight safety standards or pose hazards to airside users including vehicles and equipment. This will include checks on spill kit stocks which will be reported to the RFFS.

RFFS

- RFFS will attend all spillages following notification from the OCR.
- RFFS retain the overall responsibility of the safety of the scene, contain the spill and implement emergency procedures where required.
- RFFS will assess whether the airport drainage system has been compromised by the spill and if necessary, instruct the OCR to activate the drainage isolation system, determining whether if an emergency contractor is required to further contain, clear and remove the spill including the removal of hazardous waste, this will be escalated accordingly to the OIC for review and discussion.
- The OIC will carry out an inspection of the spillage site. Upon review – if it is deemed that an external company is required to clean the spillage then the OIC will consult with the ADM.

EXTERNAL ENGINEERING

- External Engineering is to respond to an activation of the drainage isolation system.
- External Engineering is to ensure the local brooks are protected and to call out third parties if contamination is found to the local watercourses.
- External Engineering will collate information for the Environment Agency and the Environmental Specialist.
- External Engineering will confirm the reset of the drainage isolation system to the ADM which will be disseminated to the OCR.

Drainage interceptors are situated at various points landside and airside.

- I. All drainage interceptors are to be cleaned regularly under the supervision of the Head of External Engineering. Third parties responsible for their own drainage system must ensure drainage interceptors are cleaned regularly having records of such cleanses available to EMA upon request.
- II. Any interceptor downstream of significant spills which are known to have entered the drainage system and impacted the interceptor preventing effective operation will be emptied/ skimmed as appropriate within 24 hours of the incident.

THIRD PARTIES

- It is the responsibility of all operators to report all spillages.

- It is strongly recommended that all operators have procedures for using, emergency spillage kits which are carried in their vehicles and should have received the appropriate training and ensure the correct PPE is worn to clean up spillages.
- A spillage must not be spread, so where the spill cannot be contained or impacts a roadway or stand, people, vehicle and equipment should not enter the spillage site. The manager / supervisor of the operation should consider stopping all activities compromised by the spillage, until the Airport Authority have inspected the scene.
- Minor contamination of wheels can be cleaned at a consented wash pad site. Heavy contamination must be removed using the appropriate spill kit such as spill pads.

1.2 Clean Up Procedure

- 1.2.1 All spillages should be cleaned up immediately. Limited action to reduce the impact of any spillages upon drainage systems may be carried out by any operator by utilising the equipment found within the quick response spillage kits and must be reported to the OCR on Ext. 3333 or 01332 818555.
- 1.2.2 Should a spillage occur at the tenant fuel point, this must also be reported to the OCR on Ext. 3333 or 01332 818555 and any supplies used from within the local quick response spillage kit, must also be reported to the OCR.
- 1.2.3 The contents found within the quick response spillage kits, located across the EMA site are available to assist in the control of spillages, any equipment utilised by a third party operator must be reported to the OCR on Ext. 3333 or 01332 818555.
- 1.2.4 If an operator or company cannot clean up any spillage, nor has any facility for a clean-up operation, the Airport Authority will carry out this task and charge the responsible company accordingly, as detailed in the EMA Fees and Charges.
- 1.2.5 Unless permission is obtained from the Airport Authority, no spillages (no matter how small) are to be left unattended or untreated. Absorbent materials used to contain any spillage is to be removed as soon as reasonably practicable and disposed of in accordance with appropriate waste legislation. All contaminated materials used to absorb oils, fuels or any other hazardous material must be stored in suitable lidded container, appropriately labelled and not with general waste. They should be disposed of using hazardous waste consignment notes, a copy of which must be kept on site for three years. Third parties are responsible for retaining records to demonstrate compliance and these records may be subject to auditing purposes upon request.
- 1.2.6 If an external contractor is to be utilised for cleaning a spillage, then the scene must be isolated to enable cleaning to be carried out. This will be under the management of the AODM (Airside) or ADM (Landside).
- 1.2.7 On completion of any cleaning – it is the responsibility of the AODM to confirm serviceability of the affected airside area or the responsibility of the ADM to confirm serviceability of the affected landside area.

- 1.2.8 Management of personnel with responsibilities for managing, and where applicable clearing spillages, ensure those people are appropriately trained and that their proficiency is maintained. Training records relating to the risks associated with the bulk storage and handling of relevant chemicals and prevention of pollution must be kept documented for all relevant staff and kept available for inspection on request.
- 1.2.9 The Airport Authority will conduct comprehensive root cause investigations for all spillages occurring across the site. In cases where negligence is identified during these investigations, the company responsible may face penalties and additional actions will be pursued.
- 1.2.10 If a spillage occurs airside and is attributed to vehicle or equipment, the vehicle's Airside Vehicle Permit (AVP) will be revoked, and the vehicle will be taken landside for a CAP642 inspection – refer to AOI 12 – Control of Vehicles.

1.3 Spillage Related Charges

- 1.3.1 Environmental 'spillage' charges are reviewed and promulgated annually as part of the fees and charges, available at;
<https://www.eastmidlandsairport.com/about-us/fees-and-charges/>

1.4 Hazardous Chemicals

- 1.4.1 Operators are to ensure that spills of any chemicals which are deemed to be hazardous are reported immediately to the OCR. Examples of such chemicals include but are not limited to de-icer, anti-icer, fuel, oil, paint. Spillages of other wastes which must also be reported are detergent, dispersant and AdBlu.
- 1.4.2 Spills of toilet waste must be reported on Ext. 3333 or 01332 818555, contained to prevent entry into surface water drains and once cleaned up, removed to the discharge point known as the 'mono-muncher' in the landside waste compound as soon as possible. Toilet waste must not be washed into the surface water drains.

SECTION 2 – STORAGE OF FUELS, OILS AND CHEMICALS

- 2.1.1 All stores of oil and fuel that are greater than 200 litres must comply with the relevant standards set out within the Prevention of Pollution (Oil Storage) Regulations.
- 2.1.2 This standard should also be applied to storage of other chemicals, including but not limited to de-icing fluids and detergents.
- 2.1.3 In general, the container should be stored away from any drains, should have secondary containment (bund or double skinned tank), impact and corrosion protection measures to reduce the risk of spillages during filling, handling or dispensing from the tank/container. Any container must be labelled clearly with content (nature and quantity) and the hazards associated with the content. No intentional damage to the bulk storage tank or any bunding to it will be tolerated.
- 2.1.4 Where bunding is provided, it should be maintained in a serviceable condition impervious to the liquid which is held in the tank it is protecting and which allows the capacity of the bund to hold 110% of the content of the largest tank it protects or 25% of the aggregated capacity of the tanks it protects. Rainwater should be regularly removed from any protective bunding. However, any contaminated rainwater that accumulates in a bunded enclosure should be disposed of separately in accordance with the environmental protection (duty of care) regulations 1991 and should not be allowed to enter the Airport drainage system.
- 2.1.5 Daily Walk Round Inspections of vehicles and equipment are mandatory. It is the responsibility of the operator to ensure these checks are carried out and any defects recorded and corrected. The operator must ensure its drivers and staff are aware of this requirement. Vehicles with multiple drivers should receive a walk-round inspection once in any twenty-four-hour period. The walk round check must include the whole vehicle including any combination of trailers or dollies. It is the responsibility of the Operator to ensure vehicles and equipment are maintained in accordance with CAP642.
- 2.1.6 As far as reasonably practicable, maintenance works involving recharging or draining of potentially polluting liquids should be protected using drip trays with any captured liquids absorbed and disposed of appropriately.
- 2.1.7 Tanks, bowzers and storage facilities for fuel, oil, de-icing chemicals, toilet waste and any other chemical must be fit for purpose and properly maintained (including all pipes and dispensing equipment).

SECTION 3 - AIRCRAFT DE-ICING OPERATIONS

3.1.1 At the start of winter operations, all aircraft de-icer operators must provide both the Airfield Operations team and Environmental Specialist copies of material safety data sheets of de-icer products to be used and commit to updating EMA if changes are made during winter period. De-icer containing urea is not permitted to be stored or used anywhere across the airport.

3.1.2 In order to enhance existing procedures and better manage the amount of chemical usage, the Airport restricts the use of aircraft de-icer rigs for aircraft de-icing to areas which are already subject to increased levels of environmental control. These areas are the central, central west, east and west aprons. Aircraft de-icer rigs are not to be used in any other area.

3.1.3 Purging of de-icer onto the ground is prohibited. If purging is required, this must be into a suitable waste container and records for the removal of such waste shall be kept for the period required by law.

3.1.4 Aircraft in the Maintenance Area that are required to be de-iced must be relocated to an approved area (central, central west, east or west apron).

3.1.5 Operators are to ensure that they have adequate procedures in place to minimise the exposure of aircraft de-icing operations to passengers and other apron users. During aircraft embarkation/disembarkation processes, aircraft de-icing operations are not to be carried out in the immediate vicinity of the passengers.

3.1.6 To allow the Airport to manage the environmental impact of de-icing operations, operators are required to provide information of aircraft de-icer usage to the Airport on a daily basis.

3.1.7 Information regarding the de-icing of individual aircraft is to be input on the Microsoft Forms OCR7 document. A copy of the form will be available online for use by each third party and the information will be stored in a master spreadsheet for review by those with access permission.

3.1.8 Third party-maintained de-icer application information may still be requested at any time for corroboration of records received.

3.1.9 To allow the Airport to manage the environmental impact of anti-icing operations, operators conducting anti-icing activities are required to provide information on anti-icer usage to the Airport on a daily basis.

3.1.10 Information regarding the anti-icing of aprons is to be input on the Microsoft Forms OCR7 document. A copy of the form will be available online for use by each third party and the information will be stored in a master spreadsheet for review by those with access permission.

3.1.11 Third party-maintained anti-icer application information may still be requested at any time for corroboration of records received.

SECTION 4 - AIRCRAFT AND ROAD VEHICLE WASHING AND USE OF DETERGENT-CLEANING MATERIALS

4. Aircraft Washing and Vehicle Washing

- 4.1 Detergents and other cleaning chemicals can cause pollution of watercourses. Washing of aircraft using detergents is therefore only permitted on the aircraft wash-down point, as runoff from this area is discharged via the airports drainage system to the foul sewer for treatment. A copy of the current foul drainage plan for the airport is provided in Annex A.
- 4.2 The aircraft wash-down point is available 24 hours per day.
- 4.3 The aircraft wash-down point is located in the airport maintenance area and is designated as 63WP (wash-pan). Aircraft and vehicles can access the pan without having to enter the security classified 'critical part' of the aerodrome; however, it does fall within the defined 'airside area' as well as forming part of the aircraft movement area and as such is subject to the Rules of the Air Regulations 2007. This area is not part of the aircraft manoeuvring area and therefore the entry/movement of persons and vehicles to/on this area is not subject to prior ATC permissions.
- 4.4 The maximum size of aircraft which can be accommodated on the pan is a Boeing 767-200W. When accessing the wash-down point with an aircraft, extreme caution is to be used, especially if another aircraft occupies the adjacent parking pan.
- 4.5 The run-off from the aircraft wash-down point discharges to the foul sewer and is subject to consent limits imposed by Severn Trent. Washing must be carried out in such a manner as to ensure that run-off does not escape the drainage channels taking the runoff to sewer. Chemicals must be used at the correct dilution. Run off from the wash pan is subject to regular monitoring, to ensure compliance with the consent to discharge.
- 4.6 Reservations for the wash pan can be made by contacting EMA Control Room on 01332 852973 or EMA ext. 2973 (24 hours), an email confirmation is required to secure the booking on controlroom@eastmidlandsairport.com. Operators are to state their company, date, an approximate start time, finish time, contact name and telephone number. The water supply to the wash pan is secured by a padlock when not in use. Therefore, before washing operations may commence, the key must be collected (and signed for) from Airfield Operations (07880 787543). Once the aircraft wash is complete, the key for the wash pan must be returned. Failure to return the key will result in a £50 charge being levied to cover replacement of the lock and administration costs.
- 4.7 A charge will be made for the use of the aircraft washstand, consisting of a fixed standing charge plus a charge based on the aircraft weight and time on washstand.

- 4.8 Engine core washes can only be completed on the Aircraft Washbay. Engine washes are not permitted during periods of inclement weather (where the temperature is at or is forecast to reach freezing point). For the clarification, a dry engine run (where no fuel is ignited) following an engine wash does not require an engine run permit.
- 4.9 'Enclosed' engine core washes are not permitted on central apron stands that have a rear of stand road. Stands to be used for enclosed engine washes are those on the central west apron and the north edge of the central apron.
- 4.10 Road vehicles cannot be washed in a location that is not served by a trade effluent discharge consent for that purpose. Airside, the consented vehicle wash is at the fire station and landside there is a vehicle wash at the Motor Transport department. These are for EMA vehicles unless a written agreement is in place. The consents are limited in terms of quantity and rate of effluent discharged and third parties and it may not always be possible to accommodate additional vehicles. A trade effluent discharge consent from the appropriate statutory undertaker must be in place for washing in any other area discharging to sewer before any vehicle washing other than those already the subject of consent.

SECTION 5 – WASTE MANAGEMENT

5. Introduction

Any company that generates waste of any description or handles it on behalf of another company has a legal responsibility to ensure that it is stored, transported and recycled or disposed of in a controlled way that does not harm the environment or cause FOD. There are additional controls on the storage, handling and disposal of aircraft cleaning and catering waste, biohazard waste and of hazardous wastes.

- 5.1 Use of the Mitie-Operated MAG waste management facility is restricted to authorised airport operators and tenants only. Only airport related waste may be deposited.
- 5.1.1 Waste from fit out or construction works may not be deposited into MAG waste facilities.
- 5.2 There is a legal obligation for all companies to segregate material for recycling and manage waste in accordance with the law.
- 5.2.1 MAG provides facilities for storing paper, card, plastic bottles, glass bottles, electrical equipment, batteries, fluorescent tubes, wooden pallets and scrap metal separately.
- 5.2.2 Where third parties have their own contracts for disposal of hazardous or other wastes not handled by MAG, they are responsible for ensuring that appropriately licenced contractors only are used, and that the appropriate paperwork is completed, retained in accordance with legislation and available for inspection by MAG. Flytipping or contamination of MAG bins including

recycling bins with inappropriate or third party waste is not permitted and will be investigated as far as possible.

- 5.2.4 Waste should be handled and stored to prevent the generation of FOD. Waste must not be left on the apron or on airbridges. Any litter or spilt waste must be immediately swept up and deposited into the relevant container. Failure to control waste effectively could lead to an airfield infringement.
- 5.2.5 All staff using MAG waste compactors must have been trained in their safe use. Training will be provided to trainers and/or supervisors.

5.3 Handling International Catering Wastes

International Catering Wastes (ICW) are subject to Animal By Products Legislation requiring strict controls on the escape of such waste:

- a) ICW are to be bagged inside the aeroplane and placed in a caged vehicle for transfer landside to the waste compound.
 - b) At the waste compound the ICW is to be placed directly into a compactor and then the opening to the compactor is to be sanitised using the sanitiser provided.
 - c) Any escaped waste must be retrieved immediately and contained in the compactor.
 - d) Any caged vehicle transferring the waste must be sanitised in accordance with an APHA approved sanitisation regime.
- 5.3.1 Aircraft cleaning companies must be able to evidence to MAG and the regulator Animal and Plant Health Agency (APHA) the following:
- a) Understanding of the legislative requirements.
 - b) Registration as an ABP transporter;
 - c) Written method statements and auditable training records demonstrating staff's knowledge of ICW requirements, including: bags of aircraft cleaning waste must be tied or otherwise secured; waste must be loaded directly from the vehicle into the Cat 1 ICW compactors and not put on the ground; ICW must only be deposited at ABP-compliant facilities; any spillage of waste must be immediately cleaned up (whether on the apron, in vehicles or at the waste site);
 - d) Cleaners'/waste vehicles are labelled "Category 1 - for disposal only" and carry equipment to allow any spilt waste to be immediately cleaned up;
 - e) The disinfection regime for vehicles and equipment, including after spillages of waste;
 - f) Supervision and auditing regime for ABP compliance

5.4 Aircraft Engineering Waste

Collection and disposal of hazardous wastes including waste oil, oil cans, oil filters, oily rags, solvents etc must only be by an appropriately licenced contractor. Storage facilities must be secure and located in an area protected from impact.

Waste oil tanks and any other bulk containers must comply with the Control of Pollution (Oil Storage) Regulations. All companies are responsible for obtaining and retaining hazardous waste consignment notes in compliance with the legislation.

5.4.2 Containers for waste oil filters must be prevented from leaking into the drainage system.

5.5 Aircraft de-icing waste

Aircraft de-icing companies are responsible for the disposal of waste fluid arising due to stock management, testing or any other reason.

5.5.1 All companies are responsible for obtaining and retaining hazardous waste consignment notes and waste returns in compliance with the legislation.

5.6 Waste upholstered domestic seating

There are additional controls required in relation to handling and storage of waste upholstered domestic seating containing Persistent Organic Pollutants (POPs - normally fire retardants). It includes:

- sofas
- sofa beds
- armchairs
- kitchen and dining room chairs
- stools and foot stools
- home office chairs
- futons
- bean bags, floor and sofa cushions

5.6.1 There is limited space at the Mitie-operated MAG facility for storage therefore if this is the usual path for your waste, this type of waste should be kept in situ until a separate collection can be arranged to remove the waste directly to a suitable facility.

5.6.2 All producers of this waste must sort, and store their waste upholstered domestic seating containing POPs in a way that prevents damage, release of POPs and contamination with other waste. If stored externally the waste must be placed in an enclosed skip specifically for this waste type without being mixed with any other wastes

SECTION 6 – ENVIRONMENTAL REGULATION SCHEME

6. Introduction

East Midlands Airport is responsible for protecting the environment from the operation and maintenance of the aerodrome. Each member of the aerodrome operating staff should undertake their duties in conformity with the relevant provisions of the Aerodrome Manual and Airside Operational Instructions. Companies operating at East Midlands Airport must have in place an environmental policy and follow procedures which are designed to protect the environment and prevent pollution. The primary objectives of the Airside Environmental Regulation Scheme are to prevent environmental damage. The scheme extends to all airside operators including employers, employees, subcontractors, representatives, authorised agents, and invitees of EMA. EMA retains the right to take such action, as it considers necessary to ensure protection of the environment following serious breaches of regulations, policies or procedures. The scheme primarily regulates the procedures and regulations contained within the Aerodrome Manual, Airside Operational Instructions, Operational Advice Notices and Airport Bye Laws.

The aim of this scheme is to have a system that will ensure that all airside operators are aware of the environmental performance of their company and employees and that, when required, fair and corrective actions are taken to remedy any shortcomings. It operates as a co-operative and consultative initiative and does not replace any operators existing disciplinary or internal regulatory procedures.

6.1 Operation of the Scheme

6.1.1. East Midlands Airport ("**EMA**") Airfield Operations has the primary responsibility for airside environmental regulation and the administration of this scheme. This is carried out through active monitoring of all airside activities and areas.

6.1.2 EMA takes compliance with applicable environmental laws, statutes, regulations, codes, policies, or procedures whether set out in this document or otherwise (the "**Environmental Obligations**") seriously. EMA reserves its rights to enforce any failure by an Operator (including any of its officers, employees, consultants, contractors, or workers) to comply with the Environmental Obligations at EMA. This includes any enforcement action taken at EMA's discretion in accordance with this Section 5.

6.1.3 EMA's exercise of any right or remedy provided under this Section 5 shall not constitute a waiver of any other right or remedy, nor shall it prevent or restrict any further exercise of that or any other right or remedy provided under this document or any other agreement between EMA and the Operator. For the avoidance of doubt, any action taken by EMA in accordance with this Section 5 shall be in addition to any other rights or remedies EMA may have under law or otherwise (including seeking damages, other remedial action or full rectification relating to a breach of Environmental Obligations).

6.1.4 Nothing in this Airside Operational Instruction shall limit or exclude the Operator's liability arising out of, or in connection with, any breach of the Operator's Environmental Obligations. The Operator shall at all times comply, and ensure that its officers, employees, workers, consultants and contractors comply, with all of the Operator's Environmental Obligations.

6.2 Verbal warnings and Investigations

6.2.1 Notwithstanding any other rights or remedies EMA may have under this Airside Operational Instruction, EMA may issue a verbal warning but take no further action for a minor infringement which it deems, in EMA's sole and absolute discretion, to be a minor unintentional breach of the Operator's Environmental Obligations.

6.2.2 In exceptional circumstances (i.e. suspected negligence, incompetence etc.) EMA may immediately call in the operator for a formal meeting. This is at the discretion of the Head of Airfield Operations and is irrespective of the number of points held or the number of previous written non-compliances. The Head of Airfield Operations will have the authority to instruct a formal investigation, this may include an environmental audit of the operator by a third-party company.

6.3 Non-compliance Notices and Points

6.3.1 Points will be awarded for each formal notification of non-compliance.

6.3.2 The number of points awarded for each type of offence are shown in paragraph

6.3.3 At the end of each 12-month period starting on date of the first infringement (each a "**Monitoring Period**"), an Operator's points will reset to zero. For the avoidance of doubt, this means that points will not carry over to the subsequent Monitoring Period.

6.3.4 If an Operator accumulates 22 points or more in any Monitoring Period, the Head of Airfield Operations at EMA may (in its sole and absolute discretion) take any enforcement action to mitigate the effects of the Operator's breach of the Environmental Obligations including, but not limited to, revoking the Operator's

Ground Handling Licence or seeking to recover the costs incurred by EMA in connection with the Operator's breaches of the Environmental Obligations.

6.3.5 All payments due under this Airside Operational Instruction shall be *be payable within 30 days of the date of the invoice*.

6.3.6 Notwithstanding paragraph 5.3.4 above, the Operator will be required to take corrective action that demonstrates that appropriate mitigation measures have been implemented within a predetermined timescale.

6.3.7 Records (including related evidence and information) of non-compliance will be retained for a period of six years.

6.3.8 Any further non-compliance occurring within one calendar month, or an operator fails to comply with previous appropriate mitigations will result the operator being requested to attend a formal meeting with the Head of Airfield Operations. This may result in formal action against the operator Ground Handling Licence.

6.3.9 For each formal notification of non-compliance issued, EMA will notify the offender and/or the offender's employer in writing. The notification letter will include a copy of the notification of non-compliance form that was issued, details of the incident and regulation/ policy/ procedure that was breached, the number of points issued for the offence, the total number of points held by the offending company.

6.3.10 Within 14 days of receipt of a written notification of non-compliance, the employer is required to advise EMA in writing of what remedial action has taken place to prevent future re-occurrence.

6.4 Appeals

6.4.1 Appeals against the issue of a fine and/or issued notifications of non-compliance must be submitted to the Head of Airfield Operations in writing within 14 days of the issue of the notice ("Appeal Deadline").

6.4.2 All appeals submitted after the Appeal Deadline will be automatically rejected. The rejection shall stand unless the Operator submits satisfactory evidence of extenuating circumstances that indicate that the Operator was unable to submit the appeal by the Appeal Deadline. Appeals submitted after 14 days will not be accepted, unless there are extenuating circumstances.

6.4.3 Details to be included in the appeal notification are:

- (a) The name, ID number and company of the appellant.
- (b) The non-compliance number, as shown on the non-compliance form.
- (c) The date and time of the incident, as shown on the noncompliance form.
- (d) The grounds on which the appeal will be based.

6.4.4 Representations may be made in person to the Airfield Operations Manager who will assess appeals against points being issued within 14 days of receipt of the appeal notification by EMA, whenever practical. If for any reason the appeal cannot take place within the specified time, notice will be given to the appellant in writing.

6.4.5 The Head of Airfield Operations will assess appeals as soon as is practicable. If for any reason all evidence is not available at this time (i.e. if witnesses have not been interviewed due to shift working etc.) the appeal will be assessed, and an interim judgement will be made. A second full appeal assessment will be held within 14 days to make a final decision.

6.5 Points

Code	Infringements		Points
E1	Littering or fly tipping of waste	Leaving waste in any form uncontained. It also includes leaving waste in any cage/ container without preventing escape.	6
E2	Deliberate release of potentially polluting fluid to unsealed surface	Purging or pouring of potentially contaminating liquids such as de-icer, oils or any other chemical onto unsurfaced/ unsealed ground, grass or unconsolidated stone covered ground.	12
E3	Failure to notify airfield operations regarding a release of liquid	Any release of potentially contaminating liquids onto the ground or into surface water drainage can potentially cause harm to environmental systems. Spills should be absorbed immediately or prevented from entering drains.	12

E4	Incorrect storage of oils, liquids or other chemicals that could cause harm if released	<p>Any containers of oils, fuels other chemicals etc should be placed on a bund to capture any spill or leak. Bunds should be able to contain 110% of the volume from the container stored on it or 25% of the aggregate volume of containers stored on it.</p> <p>Storage systems should also be located appropriately i.e. Not on soft ground, away from surface water drains and spill kits present in the vicinity for use by appropriately trained staff.</p>	12
E5	Vehicle or equipment washing without a consent to discharge/ not in an approved wash area	Unauthorised discharges from these activities can lead to pollution, are controlled by legislation and can cause the airport to be in breach of its environmental permit or trade effluent consent. All washing activities must only take place in authorised locations.	6
E6	Mismanagement of waste streams, including incorrect disposal of hazardous waste such as WEEE, used spill granules etc	<p>No electronic equipment or other hazardous waste must be placed in general or mixed recycling skips or containers.</p> <p>Bulky POPs containing upholstered domestic seating must be kept separate for disposal by incineration or other suitably destructive process.</p>	6
E7	Contamination of recycling containers	Cross contamination of any clearly marked container or contaminated material	6
E8	Mismanagement of CAT 1 Waste	CAT 1 waste is animal by product that has originated outside the EU, and its disposal is tightly controlled. Skips/containers must be sealed, disinfected regularly, secure	8

		and clearly marked. The correct authorisation should be in place from APHA for handling/ transporting the waste.	
E9	Incorrect or unauthorized connection of surface or foul water drainage	<p>Surface water enters the airport's pond systems. The discharge is monitored and reported to the Environment Agency (EA) and the EA also monitor what we discharge. Contamination of the surface water drainage system may have an impact legally.</p> <p>Effluent discharging to sewer must only occur in accordance with a trade effluent consent. Discharges of this nature can only be conducted in authorised locations.</p>	8
E10	Failure to control dust emissions or mud on the highway during construction work	Airborne dust can cause a nuisance to those nearby and mud carried on to the road can cause a hazard for driving and contamination of surface water drainage. Suitable mitigation should be implemented to prevent nuisance or mud being carried onto the roads such as wheel washes, and mobilisation of a road sweeper for preventing mud being deposited on the road and a means of spraying dusty material to prevent it becoming airborne.	2
E11	Repeated failure to correctly record de-icer applications in accordance with AOI 24	De-icing companies are required to provide to EMA quantities of de-icer applied to each aircraft on a daily basis.	2
E12	<u>Storage and or handling of de-icer products containing urea anywhere at the airport</u>	<u>The use of de-icer containing urea is prohibited by the Environment Agency at the airport. Use or storage of any such product will constitute a breach of the Environmental Obligations.</u>	<u>12</u>

Annex A – Surface Water Drainage Plan