# Environmental Procedures

Airside Operational Instruction 24

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AOI Owner – Airfield Operations



## SECTION 1 - AIRCRAFT WASHING AND USE OF DETERGENT/CLEANING MATERIALS

## 1. Aircraft Washing

- 1.1 Detergents and other cleaning chemicals can cause pollution of watercourses. Washing of aircraft using detergents is therefore only permitted on the aircraft washdown point, as runoff from this area is discharged via the airports drainage system to the foul sewer for treatment.
- 1.2 The aircraft wash-down point is available 24 hours per day.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 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 <u>controlroom@eastmidlandsairport.com</u>. 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.
- 1.7 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.

- 1.8 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.
- 1.9 '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.

## SECTION 2 - ACCIDENTAL FUEL/OIL/CHEMICAL SPILLAGES

## 2. Introduction

Legislation places a duty on all companies to take all reasonable precautions to ensure that water pollution does not take place. One of the potential sources of pollution is from fuel, oil chemical spillages and toilet waste (sewage). It is therefore essential that oil, fuel, chemicals and toilet waste are stored and handled correctly and that all spillages are reported as soon as possible.

Tanks, bowsers 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).

Staff must have been given appropriate training in the use of equipment to reduce the risk of spillages and must know and understand what to do in the event that they cause or discover any kind of spillage. All personnel, regardless of employer are responsible for:

- reporting any spillage which they cause or discover without delay.
- providing information and where possible assisting in preventing the spill from entering the water drains/

## 2.1 Storage Requirements

- 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 protection and measures to reduce the risk of spillages during filling, handling or dispensing from the tank/container.
- 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. However, any contaminated rainwater that accumulates in a bunded enclosure should be disposed of separately and should **not** be allowed to enter the Airport drainage system.

### 2.2 Reporting and Clean Up Procedure

- 2.2.1 All accidental spillages that may have entered the drainage system are to be reported to the Operations Control Room on 01332 852973 or Ext 2973.
- 2.2.2 Any fuel / flammable liquid spills over 500 litres are RIDDOR reportable and should be reported to the EMA 'Health and Safety and Fire Safety Manager'.
- 2.2.3 Spillages which have not entered the drainage system are to be cleaned up immediately. In order to assist in the control of such spillages, absorbent granules are located in bins on the central, central west and east aprons. Spill Kits will primarily be utilised by RFFS and the operations team but may also be used by third party companies. Absorbent granules are also carried in some operational vehicles. If the granules are applied by a third party, this must still be notified to the Operations Control Room on 01332 852973 or EXT 2973.
- 2.2.4 Should a spillage occur at the tenant fuel point and granules from within the spill kit bin are used by a third party, this must still be notified to the EMA Control Room on 01332 852973 or EXT 2973.
- 2.2.5 If a company cannot clean up any spillage immediately nor has any facility for a clean-up operation, the Airport Company will carry out this task and charge the responsible company, accordingly, as detailed in the EMA Fees and Charges.
- 2.2.6 Unless permission is obtained from Airfield Operations, no spillages (no matter how small) are to be left unattended or untreated. Absorbent materials used to contain any spillage are to be removed immediately and disposed of in accordance with appropriate waste legislation. Hazardous wastes must be stored in suitable, appropriately labelled, lidded containers.
- 2.2.7 Drainage interceptors are situated at various points landside and airside.
  - 2.2.7.1 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.

- 2.2.7.2 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.
- 2.2.8 Management of personnel with responsibilities for managing, and where applicable clearing spillages, ensure those people are appropriately trained and that their proficiency is maintained.

## 2.3 Spillage Related Charges

2.3.1 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/

## 2.4 Hazardous Chemicals

- 2.4.1 Operators are to ensure that spills of any chemicals which are deemed to be hazardous are reported immediately to the Operations Control Room. Examples of such chemicals include but are not limited to de-icer, anti-icer, fuel, oil, paint. Spills of other wastes which must also be reported are toilet waste, detergent, dispersant and AdBlu. EMA RFFS have specific procedures for dealing with such incidents.
- 2.4.2 Spills of toilet waste must be contained to prevent emission to surface water drains and removed to the discharge point known as the 'mono-muncher' in the Mitie-operated waste compound as soon as possible. Toilet waste must not be washed into the surface water drains.

## **SECTION 3 - AIRCRAFT DE-ICING OPERATIONS**

## 3. Introduction

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.

3.1 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.

- 3.2 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.
- 3.3 Aircraft in the Maintenance Area that require to be de-iced must be relocated to an approved area (central, central west, east or west apron).
- 3.4 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.
- 3.5 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.
  - 3.5.1 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.
  - 3.5.2 Third party-maintained de-icer application information may still be requested at any time for corroboration of records received.

## SECTION 4 – WASTE MANAGEMENT

## 4. 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.

- 4.1 Use of the Mitie-Operated MAG waste management facilities is restricted to authorised airport operators and tenants only. Only airport related waste may be deposited.
  - 4.1.1 Waste from fit out or construction works may not be deposited into MAG waste facilities.
- 4.2 There is a legal obligation for all companies to segregate material for recycling and manage waste in accordance with the law.
  - 4.2.1 MAG provides facilities for storing paper, card, plastic bottles, glass bottles, electrical equipment, batteries, fluorescent tubes, wooden pallets and scrap metal separately.

- 4.2.2 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.
- 4.2.4 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.
- 4.2.5 All staff using MAG waste compactors must have been trained in their safe use. Training will be provided to trainers and/or supervisors.
- 4.3 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.
  - 4.3.1 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

#### 4.4 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.

- 4.4.1 Waste Disposal 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.
- 4.5 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.

- 4.5.1 All companies are responsible for obtaining and retaining hazardous waste consignment notes in compliance with the legislation.
- 4.5.2 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
- 4.5.3 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.
- 4.5.4 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.

## SECTION 5 – ENVIRONMENTAL REGULATION SCHEME

#### 5. 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. 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 cooperative and consultative initiative and does not replace any operators existing disciplinary or internal regulatory procedures.

#### 5.1 Operation of the Scheme

- a) 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/areas.
- b) Penalty points, issued as a result of failure(s) to comply with airport regulations will be issued against the company which the person committing the offence is employed.
  - i. If there is a genuine minor error, (e.g., there was no obvious potential for an accident to be caused), a verbal warning will be given, and the details recorded.
  - ii. More serious breaches or persistent minor breaches of regulation will result in a formal written notification of non-compliance being issued and copied to the employer.
  - iii. If the points awarded for any breach of regulation leads to the offending company holding 22 or more penalty points at one time, a senior representative from the company will be requested to attend a in person meeting with MAG's environmental team whereby corrective actions will be set. Operators will have to inform the Environmental Team of any rectifications in writing within 14 days of the meeting.
  - iv. 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.

- c) For each formal notification of non-compliance issued, EMA will notify 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.
- d) 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.
- 1.1 Non-Compliance Notices
  - a) Points will be awarded for each formal notification of non-compliance. The number of points for company offences is shown in paragraph 1.6.
  - b) The points awarded against each non-compliance will remain in force for a period of 12 months, unless the company has received more than 12 penalty points.
  - c) Should an operator receive more than 22 points in any 12-month period, a senior representative from the company will be requested to attend a in person meeting with MAG's environmental team.
  - d) Corrective action will require that the company demonstrates that appropriate mitigation measures have been implemented within a predetermined timescale.
  - e) Upon completion of the appropriate mitigating action set out by the Environmental Specialist, the number of points held by the company will return to zero, however the non-compliance notice(s) will be held on file for a period of five years.
  - f) 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.
- 1.2 Appeals
  - a) Appeals against the issue of a fine and/or issued notifications of noncompliance must be submitted to the Head of Airfield Operations in writing within 14 days of the issue of the notice.
  - b) Details to be included in the appeal notification are:
    - i. The name, ID number and company of the appellant.
    - ii. The non-compliance number, as shown on the non-compliance form.
    - iii. The date and time of the incident, as shown on the non-compliance form.

- iv. The grounds on which the appeal will be based.
- c) 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.
- d) 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.

Code		Environmental 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 (ie grass or unconsolidated stone)	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 i.e. Fuel, Oil, De- lcer, or any other media that could cause harm to the environment	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	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. ` 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.	12

#### 1.4 Penalty Points awarded:

Code		Environmental Infringements	Points
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	No electronic equipment or other hazardous waste must be placed in general or mixed recycling skips or containers. Bulky POPs containing upholstered domestic seating must be kept separate for disposal by incineration or other suitably destructive process.	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 and clearly marked. The correct authorisation should be in place from APHA for handling/ transporting the waste.	8
E9	Incorrect or unauthorized connection of surface or foul water drainage	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. 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.	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