

# Pollution Incidents Handling, Assessing & Self Reporting

## Purpose and scope

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### Purpose

To ensure the correct actions are taken on notification of a potential pollution.

### Scope

All Anglian Water personnel defined in the procedure.

## Responsibilities

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Operational Control Manager (Water and WR)	
1	Monitor the PCC for new pollution jobs, own the overall control of the event, delegating actions as required to ensure prompt response and complete information capture within PCC
2	Liaise with FR to ensure appropriate immediate remedial action is taken to prevent, stop or minimise any discharge
3	<p>Where there is a <u>Visual Impact</u> or evidence of a prior impact: (e.g. ammonia monitor trend with high levels, blanket alarm, debris, discolouration)</p> <ul style="list-style-type: none"> <li>Ensure FR completes the 'Categorisation Wizard' within the Mobile App to capture all required information Where FR is not able to complete the 'Categorisation Wizard' ensure the impact information is captured using the Tactical Operations Wizard</li> <li>Ensure a copy of the Tactical Operations Wizard (when used) output is copied into the relevant job in the PCC</li> <li>Where FR unable to complete IA, assess probability of need to report based on OCM Guidance Note (linked in Supporting Information Section 6) and Self Reporting Guidance for OCMs also linked in Section 6</li> <li>Ensure all field sample results and on site checks are captured in the PCC</li> <li>Consider whether evidence points to a third-party either contributing or causing the impact.</li> <li>Consider specific circumstance of each reported event. If applicable, record within the PCC any reasons for overriding the Mobile App result. If incident is a Water Recycling event, then consult with Water Operational Control Manager and Water Quality Scientist regarding any potential impact on water abstraction points</li> </ul>
4	Where there is a suspected discharge to the environment, but an impact cannot be verified or only partially observed ensure the process within the Self Reporting Guidance Note (linked in Supporting Information Section 6) is followed
5	<p>Where a bathing water has been, is or could be, affected:</p> <ul style="list-style-type: none"> <li>Provide onsite FR with tide times, when requested, to ensure health and safety whilst investigating (see link in Supporting Information Section 6)</li> <li>Obtain information on the level of impact and input details into the Tactical Operations Wizard to</li> </ul>

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Published:  
30/11/2023

Review by:  
30/11/2026

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Head of Pollutions Strategy

	<p>determine the advised handling of the event (consider if use of the Tactical Operations Wizard is applicable and instigation of the bathing water conference call – see Appendix for internal and external stakeholders)</p> <p>Where visual impact is not an applicable indicator of impact to coastal environment ensure the Bathing Waters Predictive Tool is used to assess potential impact and instigate further actions</p> <ul style="list-style-type: none"> <li>Consider the specific circumstances of each reported event. If applicable, record within the PCC any reasons for overriding the Tactical Operations Wizard result</li> <li>Ensure the Tactical Operations Wizard output is copied into the relevant job in the PCC</li> </ul>
6	<p>Where notified of a Water Recycling Centre final effluent breaching Upper Tier or 3x Look Up Table</p> <ul style="list-style-type: none"> <li>Ensure IA is completed (inc. spot ammonia samples where appropriate)</li> <li>Ensure mitigation is in place to cease discharge or mitigate impact</li> <li>Escalate immediately to Senior Operations Manager</li> </ul>
7	<p>Where we suspect a discharge may have been caused by a third party, regardless of whether there is a visual impact, agree appropriate sampling and evidence gathering, seeking scientific advice if unsure of substances involved.</p>
8	<p>If the incident is a <u>Reportable Pollution Incident</u>:</p> <ul style="list-style-type: none"> <li>Self-report the pollution incident to the EA within 30 minutes of confirmation that an incident is reportable</li> </ul> <p><i>If we knowingly make a self report significantly after (&gt;2hrs) being made aware of a confirmed impact ensure that <u>the ICS call agent is informed that the report is delayed and the reasons why.</u></i></p> <ul style="list-style-type: none"> <li>Record in the PCC that the incident has been reported to the EA and include the NIRS reference number. Supply the EA with the Job Reference number to enable cross-referencing of data. Ensure the NIRS reference and source for the event is updated in the metadata on the PCC.</li> <li>If the incident is an indicative Cat 1, Cat 2 or Cat 3 and discharge on-going:             <ul style="list-style-type: none"> <li>Ensure that updates from the Mobile App are received in the PCC in a timely manner.</li> <li>Liaise with the FLM and SDS or WQS as appropriate</li> <li>Inform the Senior Operations Manager (SOM)</li> </ul> </li> <li>If the incident is indicative Cat 3 and the discharge has ceased:             <ul style="list-style-type: none"> <li>Ensure updates from the Mobile App are received in the PCC in a timely manner</li> <li>Inform the FLM of the event</li> <li>Out of hours: ensure FLM is advised the next working</li> </ul> </li> <li>Make suitable and accurate records of notifications and escalations are made in timeline of PCC</li> </ul>
9	<ul style="list-style-type: none"> <li>If a significant pollution has occurred, or is likely to occur (including WRC FE UT breach) and is attributable to a permitted asset check if a relevant permit has been changed to EPR using link in Supporting Information</li> <li>If site has EPR Permit, notify SDS or WQS of need to submit the Part <a href="#">A</a> and <a href="#">B</a> Notifications accordingly</li> </ul>
10	<p>Where there is a <u>No Impact</u> discharge:</p> <ul style="list-style-type: none"> <li>Ensure the necessary information has been collected by the FR. This could include upstream and downstream photos to show no impact.</li> <li>If the event has not auto closed in the PCC, close the event card with “No Impact”.</li> </ul>
11	<p>Ensure informant is updated with details of the outcome where required and where there has been EA involvement they are updated before closing the event on the PCC</p>
12	<p>Record incident information in the PCC where the event is attended by an employee without access to the Mobile App or PCC</p>
13	<p>Create a concise and technically accurate storyboard description for each event that has been allocated a NIRS reference number.</p>

## Environmental Permitting Scientist or Water Quality Scientist

1	When notified of requirement to report under EPR permit ensure the forms Part A and Part B are
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30/11/2023

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30/11/2026

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	completed and submitted within the required timescales
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<b>Operational Control Manager (Water only)</b>	
1	When notified of a burst water main, review the available information to ascertain the probable scale of water loss
2	Where significant loss is anticipated, using combined legend on GNet, review the surface water drainage connectivity to evaluate the likely point of impact (discharge) to watercourse
3	Liaise with FR to verify if/where any run-off is actually entering a watercourse and ensure evidence gathering is instigated as appropriate

<b>Field Resource</b>	
1	Take appropriate immediate remedial actions to stop pollution incident – ensuring minimal impact to the environment
2	Ensure that within 30 minutes of getting to site that the impact is briefly assessed and the OCM updated with photos uploaded via the mobile app
3	Identify if there is any third-party involvement in the pollution incident If there is any evidence of third-party involvement: <ul style="list-style-type: none"> <li>• Commence appropriate investigations.</li> <li>• Take photographs.</li> <li>• If a third-party witness is willing to provide their details and/or a statement, complete the Third Party Involvement Report (Supporting Information Section 6).</li> <li>• Take a photograph of the completed Third Party Involvement Report using the Mobile app.</li> <li>• Send the original completed Third Party Involvement Report to your Line Manager to be filed.</li> </ul>
4	Investigate discharge (if safe to do so) and assess for any visual impact.
5	Where a bathing water has been, is or could be, affected: <ul style="list-style-type: none"> <li>• Check tide times; if not available locally seek advice through the OCM to ensure Health and Safety regarding incoming tides whilst investigating.</li> <li>• Ensure the incident is investigated back to source and assets checked for functionality.</li> <li>• Take photographs and observations as detailed in supporting information.</li> <li>• Check for local beach signage (where safe to do so) to clarify information being given out to members of the public.</li> <li>• Gather data to ascertain the number of beach users.</li> <li>• Agree with the OCM any additional remedial action and clean up where necessary.</li> <li>• Take spot samples if non-saline water body.</li> </ul>
6	If the incident is a <u>Reportable Pollution Incident</u> : <ul style="list-style-type: none"> <li>• Follow the Mobile App, taking photos and samples as appropriate (See Section 6 – Supporting Information).</li> <li>• Assist the OCM as required to help determine if a discharge is a Reportable Pollution.</li> <li>• Agree with the OCM any additional remedial action, laboratory samples and clean up where necessary.</li> </ul>
7	If the incident is <u>Not Reportable</u> : <ul style="list-style-type: none"> <li>• Follow the Mobile App, taking photos and samples as appropriate.</li> <li>• Close job as “Non-Reportable”</li> </ul>
8	If an Environment Agency Officer is on site: <ul style="list-style-type: none"> <li>• Where possible shadow the Officer and take notes of any observations or comments he/she makes.</li> <li>• If an EA Officer takes photographs, try to take similar photographs to capture the same evidence</li> <li>• Update the Mobile App with the photos.</li> <li>• Update the information on the Mobile App to show the EA Officer as being on site</li> </ul>

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9	<p>Formal Samples:</p> <ul style="list-style-type: none"> <li>If the EA Officer takes a formal sample, ensure the sample is split and the “Receipt of Formal Samples from the Environment Agency” procedure is followed</li> </ul>
10	<p>Accurately and fully record incident information using the Mobile App: For <b>ALL</b> discharges to a watercourse ensure there is an upstream, point of impact and a downstream photo which clearly show the condition of the watercourse. If samples are taken, then a photograph of the watercourse should be taken at each sample location where possible. When returning to an event to carry out a follow-up IA, wherever possible repeat the samples and photos in the same locations as previously done, ideally from the same viewing angle to provide consistent information If you do not have a suitable mobile device contact the OCM to record details in the PCC for you.</p>
11	<p>Ensure adequate evidence, including photographs are collected to support any potential No Impact or Third-Party claims to the EA</p>
12	<p>Assist with investigations to understand the root cause of the incident and to help minimise the risk of future incidents. Support the FLM in any reviews or investigations</p>

<b>Senior Operations Manager</b>							
1	<p>Arrange a conference call as soon as reasonably practical in response to an indicative Cat 1 or 2 incident, suggested attendees (time dependent):</p> <ul style="list-style-type: none"> <li>On site operational representative</li> <li>FLM</li> <li>Relevant Senior Leader (optional if available)</li> <li>Operational Control Manager</li> <li>Service Delivery Scientist (or standby if out of hours)</li> <li>Duty Water Quality Scientist</li> <li>Legal Team Representative (optional if available)</li> <li>Pollution Technician (optional if available)</li> <li>Coastal Water Protection Team Representative (if linked to impact on Bathing Water)</li> <li>Media Team</li> </ul> <p>Use the Conference Call template [REDACTED]</p>						
2	<p>For all events reported to, or by, the EA where a NIRS ref is obtained ensure suitable event information is added to the ‘Description’ field within the Storyboard tab of the PCC</p>						
3	<p>For each NIRS referenced event, after the OCM has created a storyboard description, review the storyboard description and all attached photos for relevance then publish the storyboard to the EA portal. This should be as soon as possible after the NIRS reference has been obtained.</p>						
4	<p>Arrange Case Management conference call within 72 hours of an indicative Cat 1 or 2 incident for:</p> <ul style="list-style-type: none"> <li>Relevant Senior Leader</li> <li>FLM</li> <li>Operational Control Manager</li> <li>Service Delivery Science Manager (where applicable)</li> <li>Water Quality Manager (where applicable)</li> <li>Legal Team Representative</li> <li>Biology Lab Representative</li> <li>Pollution Technician</li> <li>Coastal Water Protection Team Representative (if linked to impact on Bathing Water)</li> </ul> <table border="0"> <thead> <tr> <th><u>Agenda item</u></th> <th><u>Presenter</u></th> </tr> </thead> <tbody> <tr> <td>1. Incident status</td> <td>SOM</td> </tr> <tr> <td>2. Post-incident action</td> <td>FLM</td> </tr> </tbody> </table>	<u>Agenda item</u>	<u>Presenter</u>	1. Incident status	SOM	2. Post-incident action	FLM
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3.	Pollution Impact Assessment	FLM/delegate
4.	Regulatory position	SDSM or WQM
5.	Legal position	Legal
6.	Next Steps – confirm actions	SOM

Pollution Technician	
1	Ensure, prior to assignment, that each NIRS referenced event has had a storyboard initially published to the EA portal.
2	Assign each storyboard categorised as Indicative Category 3 or higher to the relevant FLM and supporting staff for Post Event Analysis.
3	Review all returned storyboards for quality assurance: <ul style="list-style-type: none"> <li>If the storyboard has not been completed appropriately then return to FLM and supporting staff for review.</li> </ul> If the storyboard has been returned by a Senior Manager, review the comments: <ul style="list-style-type: none"> <li>If the storyboard has been returned due to minor presentation or formatting, then correct the storyboard and resubmit it to the senior manager.</li> <li>If there are technical inaccuracies, errors or omissions within the storyboard or PEA then return the storyboard to the appropriate FLM.</li> </ul>
4	Track each storyboard and make chases, where appropriate, to ensure that all storyboards are completed within the agreed timeframe.

First Line Manager	
1	Investigate each pollution that has an Indicative Categorisation of 3 or higher and complete all sections of the PEA (Root Cause Analysis, Lessons and Mitigating Actions) and complete the “Mitigation Actions” section of the storyboard. Allow sufficient time for peer review and return within 28 days of notification.
2	(Water Services only) Ensure agreed actions are raised onto the ‘Action Management System’.
3	Peer Review each storyboard within appropriate forum dependent of risk/impact and pass the storyboard back to the PT for quality assurance and onward processing within 28 days of initial notification

Regional Manager	
1	Review each relevant storyboard and PEA for technical accuracy: <ul style="list-style-type: none"> <li>If all parts of the storyboard have been completed accurately and appropriately then finally publish the storyboard to the EA portal.</li> <li>If there are any errors or technical inaccuracies in the storyboard then return the storyboard for review.</li> </ul>

## Records

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Record name	Record to be retained by (job role)	Retention Period
Pollution Storyboards	Tactical Operations Team	30 years
Pollution Form (electronic)	Electronically	30 years
Duty Manager Log	Tactical Operations Team	30 years
Third Party Involvement Report	First Line Manager	3 years

## Glossary of terms

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30/11/2023

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Term	Definition	Explanation (Link to Lighthouse if available)
Bathing water	Bathing waters are water bodies close to beaches that are used by a large number of bathers and have been designated under the 'Bathing Water Directive'	
EA	Environment Agency	
EA Portal	A web app that allows Environment Agency officers to view specified details and photos for incidents within the Pollution Control Centre.	
EPR	Environmental Permitting Regulations (type of discharge permit)	
FLM	First Line Manager	
IA	Impact Assessment – provisional assessment of impact to the environment to identify the extent and aesthetic properties of any contamination	
ICS	Environment Agency's Incident Communication Service	
Mobile App	The Mobile Pollution Application	
NIRS	National Incident Reporting System (Environment Agency database)	
OCM	Operational Control Manager	
PCC	Pollution Control Centre	
Pollution category 1	Environment Agency incident category for a Major incident	
Pollution category 2	Environment Agency incident category for a Significant incident	
Pollution category 3	Environment Agency incident category for a Minor incident	
Pollution category 4	Environment Agency incident category for a No Impact incident	
Potential Pollution	Any discharge to a watercourse and/or land which has the potential to impact the environment	
Pollution Storyboard	Part of the Pollution Control Centre that is partially transferred onto the EA Portal.	
PT	Pollution Technician	
PEA	Post Event Analysis - Part of the Pollution Control Centre where FLM's complete a root cause analysis, lessons learned and assign mitigation actions.	
Reportable Pollution Incident	Any incident that is considered reportable as a pollution incident to the Environment Agency under the Environment Agency's Operational Instruction 16_02 – Recording and Categorising water industry self-reported pollution incidents	
Tactical Operations Wizard	A manual back-up process to assign indicative categorisation to events when the mobile app is not available (there is a Water and Water Recycling version)	
FR	Field Resource, i.e. Person attending potential pollution including but not limited to WRN Field Technician (FT), Works Technician (WT), Maintenance Technician (MT), Network Technician (NT), Supply Technician (WT), Leakage technicians (LT) and Restoration Technicians (RT)	
EPS	Environmental Permitting Scientist	

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Published:  
30/11/2023

Review by:  
30/11/2026

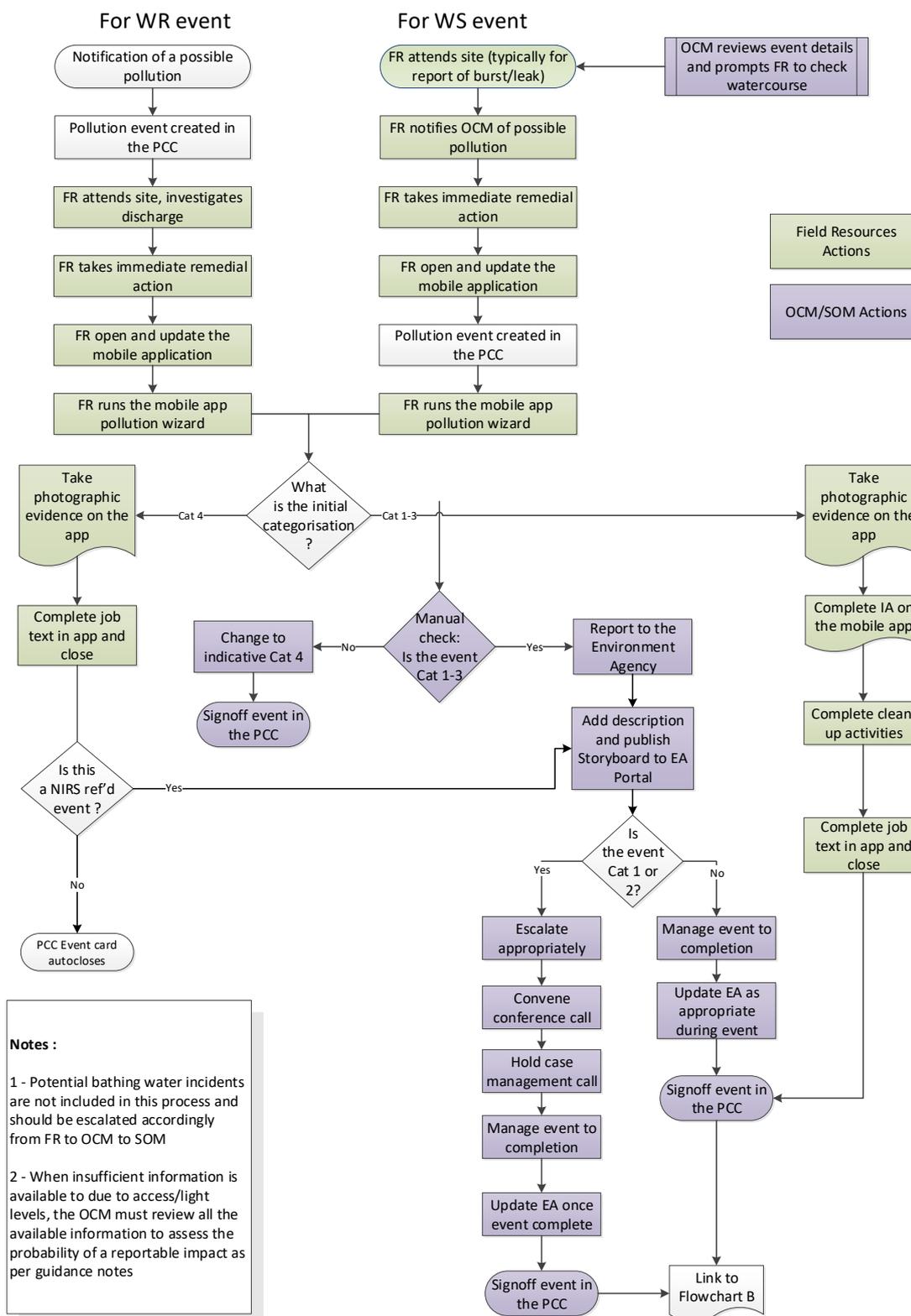
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WQS	Water Quality Scientist	
WMS	Work Management System (e.g. SAP)	

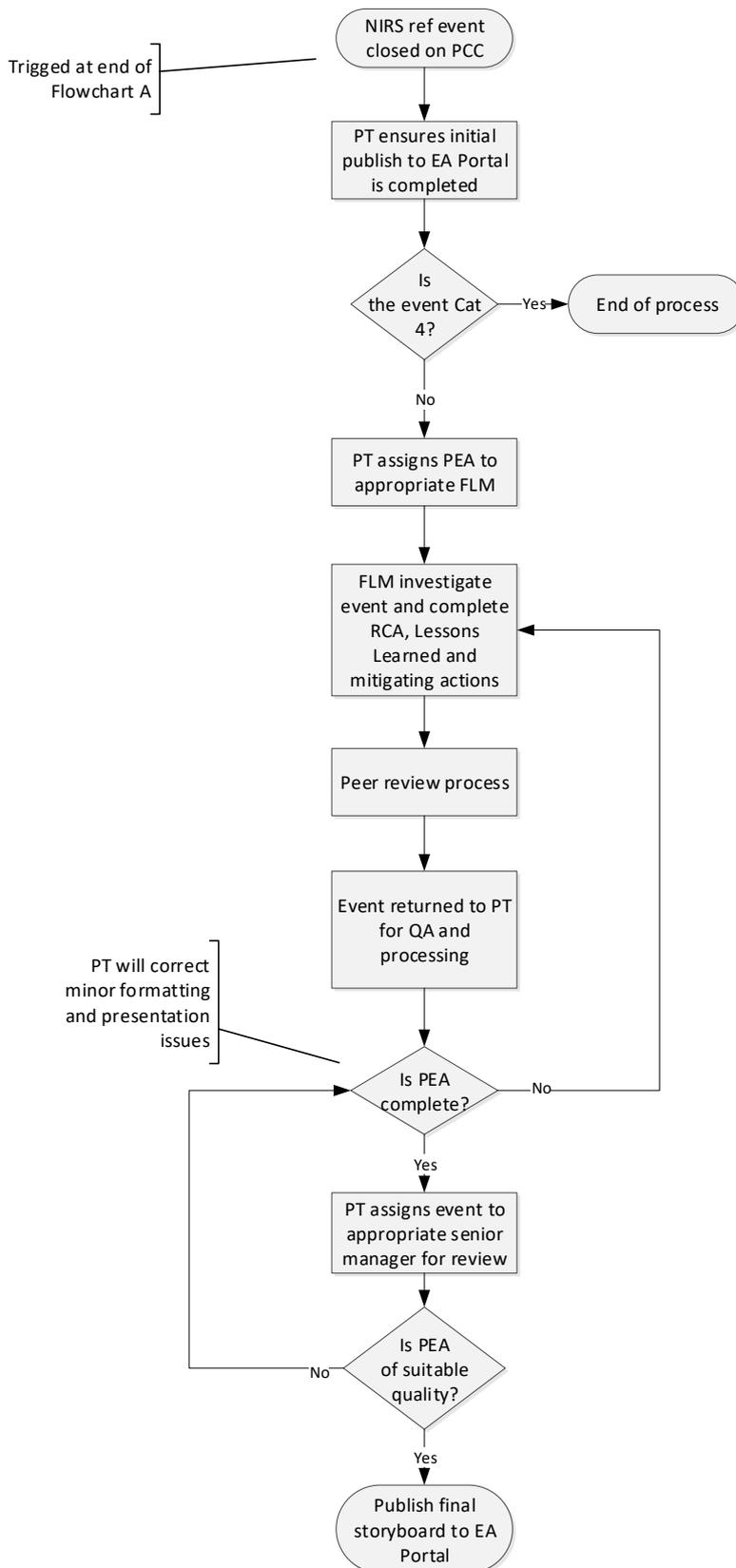
## Flowchart

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### Flowchart A



## Flowchart B



## Supporting/reference information

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### Document Name (Link to it)

#### a) Immediate Remedial Action

First response to any potential pollution incident should be to prevent or minimise the polluting effect. Where possible any flow should be prevented or diverted to avoid it reaching a watercourse.

#### b) Taking Photographs

Obtaining good quality photographic evidence for all discharges is critical to enable accurate categorisation and dispute resolution in the event of conflict with other parties' information.

The taking of photographs should be balanced with other considerations including, health and safety factors, available light and time available to stop the discharge, if any, and start clean-up. This is equally as important when there is NO impact or discharge.

Best practice would be to take 5 photographs including:

- Point of impact
- A view upstream looking from the point of impact
- A view taken from upstream looking downstream towards the point of impact
- A view downstream looking from the point of impact
- A view taken from downstream looking upstream back towards the point of impact

And, where possible at each sample location

Additional photographs may include:

- Additional views upstream and downstream of the point of discharge
- Evidence of any third-party activity

If taking additional photos, consider if they add any value. All photos should serve a purpose, either to capture impact information or mitigation evidence. For example, close-range pictures of a piece of rag in long grass at an unclear location doesn't inform the level of impact or clean-up requirements. If adding ad-hoc photos into the event feed, they must be labelled explaining where they are taken.

All photographs should be taken using the Mobile App.

#### c) Field (spot) samples - WR

In order to assess and manage our clean up, where a pollution has occurred as a result of a discharge from a suspected water recycling asset operation/failure the following ammonia readings should be taken where possible:

- Upstream of the point of impact
- Point of impact
- Approximately 10m downstream from the point of impact to get a representative sample of the impact after mixing with the water in the watercourse
- Sample for the first 500 m at convenient points e.g., where you can access the watercourse or road bridges. If impact is above 3 mg/l NH<sub>3</sub> at 500 m escalate to OCM to discuss next steps.

With the exception of saline environments and bathing waters when the EA may be required to sample for us.

Published:  
30/11/2023

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## **d) Field (spot) samples - Water**

In order to be able to assess the correct categorisation, where a pollution has occurred as a result of any discharge from a suspected Water Services asset operation/failure, turbidity readings may be taken where appropriate:

- Upstream of the point of impact
- Point of impact
- Approximately 10m downstream from the point of impact
- Sample for the first 500 m at convenient points e.g. where you can access the watercourse or road bridges.

## **e) Laboratory Samples**

On occasion it may be appropriate to collect samples for laboratory analysis from the environment, this decision will be agreed as part of a conference call, if so the details below should be applied.

### Sample labelling for WR event:

Details of point code (**S01POLLIN BZ**), date, time, sampling location, and sampler initials should be recorded on sample bottle labels.

For example:

**S01POLLIN BZ, 05/02/19 10.15am, 10m upstream discharge at Wellingborough, NM**

- Request "E7" analysis, plus any other relevant determinants as discussed with the SDS or Standby SDS.

### Sample labelling for WS event:

Details of point code (**W01POLLBZ**), date, time, sampling location, and sampler initials should be recorded on sample bottle labels.

For example:

**W01POLLBZ, 05/02/19 10.15am, 10m upstream discharge at Wellingborough, NM**

- Request relevant determinants as discussed with the Duty WQS.

## **f) Reference Documents and Related Procedures:**

[Third Party Involvement Report \(WR and WS\)](#)

[Receipt of formal examples from the Environment Agency](#)

[Handling and Reporting of Formal Environment Agency Samples \(WS\)](#)

[Pollution Impact Assessment \(PIA\) WR](#)

[Pollution Incident Packs \(WR\)](#)

[Recording and Categorising water industry self-reported pollution incidents \(EA Operational Instruction 16\\_02\)](#)

<https://www.tidetimes.org.uk/>

[Pollution Conference Call Template](#)

[Operational Control Manager Guidance Note - Assessing the Likelihood of Pollution Impact](#)

Sites which have changed to EPR Permits

[About Environmental Protection Plans \(WR\)](#)

## Appendices

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None