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Control of Major Accident Hazards (COMAH)

# External Emergency Plan

Treatt PLC  
Suffolk Park  
Bury St Edmunds  
Suffolk  
IP32 7FR

<b>Author:</b>	Joint Emergency Planning Unit on behalf of SRF
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## DOCUMENT MANAGEMENT

### GENERAL DATA PROTECTION REGULATIONS 2016/679 AND DATA PROTECTION ACT 2018

This plan does not include personal, sensitive or special category data as defined under the General Data Protection Regulations. It does include data/information relevant to achieve planning arrangements and identifies how more specific personal data will be used during any emergency.

### FREEDOM OF INFORMATION ACT 2000

This document will be made publicly available through the SRF website. Where content has been redacted under the freedom of Information Act 2000 (FOI) in the publicly available version, the paragraph number will be highlighted to show there has been a redaction and the relevant section of FOI referenced.

### ENVIRONMENTAL INFORMATION REGULATIONS 2004 (IF REQUIRED)

This plan presumes disclosure of all environmental information, under Environment Information Regulations. Where exemptions are claimed under Environment Information Regulation 12 (5)a, this will only be where one of the responder agencies has judged that the information may adversely affect either international relations, defence, national security or public safety. Where such content has been identified, the paragraph number will be highlighted and the paragraph text removed from public versions of the plan.

### REVIEW

This plan will be reviewed by the Suffolk Joint Emergency Planning Unit on behalf of Suffolk County Council and the Suffolk Resilience Forum at least every 3 years. Earlier reviews will take place if there is a change in the working practices carried out by or chemical quantities held by Treatt PLC, if there is a change in legislation or if information from other Industrial accidents and exercises where lessons are identified.

Any amendments will be issued by way of replacement page(s). Should significant changes be required, a complete re-issue of the plan will take place.

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**Glossary:**

COMAH	Control of Major Accident Hazard Regulations 2015
DLUHC	Department of Levelling Up Housing and Communities (Formally MHCLG)
Forward Control Point/Forward Command Post (FCP)	Any service's command and control facility nearest the scene of the incident, responsible for immediate direction, deployment and security. This might be an Operational/Bronze or Tactical/Silver facility depending on the circumstances of the incident.
HART	Hazardous Area Response Team (Ambulance)
HSE	Health & Safety Executive
IBC	Intermediate Bulk Containers
ICB	Integrated Care Board
Inner Cordon	The inner cordon surrounds the immediate scene to provide security and a measure of protection for personnel working within the area. Suffolk Fire and Rescue Service will maintain and control access to the inner cordon.
JEPU	Joint Emergency Planning Unit
Outer Cordon	The outer cordon controls movement of persons outside the inner cordon. The Police will maintain and control access to the outer cordon.
PIZ	Public Information Zone – area identified by HSE to describe the zone within which public information and warning of potential COMAH hazards is mandatory
RCE	Centre for Chemical, Radiological and Environmental Hazards (PHE)
RCG	Recovery Coordinating Group
Rendezvous Point (RVP)	The point to which all resources arriving at the outer cordon are directed to for logging in, briefing, equipment issue and deployment.
SCG	Strategic Co-ordination Group
SRF	Suffolk Resilience Forum
STAC	Scientific & Technical Advisory Cell
Strat.CC	Strategic Coordination Centre
TCG	Tactical Coordination Group
Traffic Control Point (TCP)	To manage the traffic flow in and around the site of a major incident
UKHSA	UK Health Security Agency (Formally PHE)

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**Amendment Record**

Amendment	Date	Amended by	Summary
1	Jan 22	SH	Update re change of title for MHCLG & PHE
2	June 22	SH	Removal of Dean Taylors details at para 1.4.1
3	Oct 22	SH	Change of names from CCG to Integrated Care Boards
4	Apr 23	VW	Update SRF Logo on front page. Change of SPOC. Update Exercise Log. Change of number of SRS command vehicles attendance Para 3.4.12, 3.4.16 updated flow chart. Appendix 8 replaced with clearer version
5	May 24	BHB	Added Appendix A COMAH Agenda
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## **Foreword**

This document is the multi-agency External Emergency plan for Treatt PLC Bury St Edmunds Suffolk. It details the roles and responsibilities of individual agencies for Suffolk Resilience Forum and other organisations as appropriate for the coordination of emergency response and recovery management in Suffolk.

The plan has been developed in accordance the Control of Major Accidents Hazards (COMAH) Regulations 2015 (hereafter referred to as the 'COMAH Regulations').

Further reference has been drawn from the Health and Safety Executive (HSE) Guide to Control of Major Accident Hazards Regulations 2015.

The plan whilst designed as a self-contained document is produced in accordance with the Suffolk Resilience Forum Emergency Plans protocols, in so far as it is both site specific and commensurate with SRF generic plans.

Consultation for developing this document has taken place in accordance with the joint agency protocols of the Suffolk Resilience Forum and Control of Major Accident Hazards (COMAH) Regulations 2015; Regulation 12 - Preparing an Internal Emergency Plans, Regulation 13 & Schedule 4 – Preparing External Emergency Plans, 14 - Reviewing External Emergency plans, Regulations 17 & 18 - information provided to the public.

**Distribution**

The information below details the recipients of this plan, together with their copy number if the plan is issued as a controlled document.

**Addressee**

Anglian Water

West Suffolk Council

Treatt PLC

DLUHC Resilience and Emergencies Division

East of England Ambulance Service NHS Trust

Environment Agency

Food Standards Agency

Health and Safety Executive

UKHSA

NHS England

West Suffolk Integrated Care Board

Suffolk Constabulary

Suffolk Fire and Rescue Service

National Highways

Suffolk Joint Emergency Planning Unit (for Suffolk County Council)

Suffolk Libraries Bury St Edmunds (sanitised)

**Exercise Log**

Details the date, type of exercise and any pertinent comments each time the plan is exercised.

Date	Exercise	Type	Comments
01.02.23	Zest	Live Play	3 Yearly Comah Exercise



# **Treatt PLC External Emergency PLAN**

## **1. Introduction**

### **1.1 General**

1.1.1 Treatt PLC has been designated as an Upper Tier Establishment under the Control of Major Accident Hazards (COMAH) Regulations 2015. Suffolk County Council is responsible for producing the External Emergency Plan and this has been undertaken on behalf of the County Council by the Suffolk Joint Emergency Planning Unit.

1.1.2 This plan provides information concerning the management and coordination of the response and recovery to the off-site consequences of a major accident, by the multi-agency partners of the Suffolk Resilience Forum and other agencies and organisations as is appropriate, in the event of a major accident occurring at Treatt.

1.1.3 The regulations define a major accident as:<sup>1</sup>

*an occurrence such as a major emission, fire or explosion resulting from uncontrolled developments in the course of the operation of any establishment to which these Regulations apply, and leading to serious danger to human health or the environment, (whether immediate or delayed) inside or outside of the establishment and involving one or more dangerous substances.*

### **1.2 Aim and Objectives<sup>2</sup>**

1.2.1 The aim of this plan is to detail the roles of the emergency services, local authorities and other external organisations in the event of a major accident including the arrangements established to help with the emergency response on site.

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<sup>1</sup> Reg 2 COMAH Regs 2015

<sup>2</sup> Reg 11 COMAH Regs 2015

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1.2.2 The objectives of this plan are:

- *Containing and controlling incidents so as to minimise the effects, and to limit damage to human health, the environment and property;*
- *Implementing the necessary measures to protect human health and the environment from the consequences of major accidents;*
- *Communicating the necessary information to the public, and to the services or authorities concerned in that area;*
- *Providing for the restoration and clean-up of the environment following a major accident*

1.3 On site and off site definitions:

1.3.1 An '**on site Incident**' is defined as "any hazardous condition, which is wholly confined in its effect, within the perimeter fence of the establishment."

1.3.2 An '**off-site COMAH Emergency**' is defined as "any hazardous condition which results in, or is likely to result in, any immediate measures that need to be taken for warning and informing the public or business neighbours within or beyond the Public Information Zone."

**Any declaration of a major Incident at Treatt will automatically activate this plan unless otherwise advised.**

1.4 Site Contact Details

1.4.1 Routine Contact Details/Non Emergency (Site Operator):

Treatt PLC Suffolk Park Bury St Edmunds IP32 7FR

Mr Robert Ferencz, Health & Safety Manager

1.4.2 Emergency Contact Details

Reception	Mon - Fri Office Hours	
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1.5. Site Information

1.5.1 Treatt PLC is situated at Suffolk Park Bury St Edmunds on a 10 acre plot. Its main operation is the distillation of citrus and essential oils into ingredients predominantly for the food, beverage and fragrance industries.

The site itself is situated on an business park and surrounded by industrial units. To its north there is an educational establishment school (Syble Andrews Academy) as well as a leisure centre operated by Abbeycroft Leisure

1.5.2 Treatt also has laboratories on site which are involved in the development and testing of new and existing products.

1.5.3 The normal operational hours for the site are

24 hrs operation Monday to Friday

There is a total shutdown of the site during the Christmas period (Christmas Eve to the first week in January).

1.5.4 Plant Shut Down Time

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All processes, including deliveries will cease until the emergency has been dealt with.

1.5.5 **Staff personnel**


1.5.6 Key Grid References

Main Site                      TL 8836 639

What Three Words =        **town.capillary.repeats**

Site plan - See maps and aerial photos as detailed at [APPENDICES 4 & 5](#)

1.5.7 Site Access and Egress

The Treatt site is contained within its own site perimeter fence and all operations as well as the reception and offices are contained in one building. There is also onsite parking for staff and visitors

1.5.8 Public rights of Way:

There are no public rights of way on the Treatt site.

It should be noted that National Cycle Path 13 lies within 500m of the perimeter of the site.

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The site itself is protected by security fencing and CCTV. Access to buildings and yards (apart from the visitor's car park and reception) require a security pass.

## 2 **Risk**

### 2.1 **Suffolk Community Risk Register**

2.1.1 The Suffolk Community Risk Register for Suffolk has assessed industrial activity for Treatt for Toxic and Chemical release as MEDIUM RISK and fires and explosion as MEDIUM RISK.

2.1.2 As part of the COMAH Site Safety Report Treatt have identified 11 major accident Hazards, of which 6 relate to fire & explosion. It is from these scenarios that the Internal and External Emergency plans are developed and revised against.

2.1.3 The Health & Safety Executive has assessed the site hazards at Treatt and identified an area described as the Public Information Zone (PIZ) see [APPENDIX 1](#) as one in which persons and or the environment are liable to being immediately affected by a major accident occurring at the establishment. The PIZ for Treatt is the site boundary.

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**However**, other scenarios considered less likely may arise involving other raw materials and combined by-products which affect the public or the environment for longer periods of time and or greater distances. These additional risks can be found in the site safety report which has been submitted to the Competent Authority by the site operator. This information can be supplied by the site representative at the various multi-agency command points.

2.1.4 The site operator is responsible for the provision of information to the public, Inc. business premises, within the PIZ<sup>3</sup> in accordance with Regulations 17 & 18 of The COMAH Regulations There are no additional sites within the PIZ.

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<sup>3</sup> Reg 18(2) COMAH Regs 2015

## 2.2 Domino Sites,

- There are no domino sites.

## 2.3 Wind direction.

The predominant wind direction is from the south west with a typical average wind speed of 8 knots. Treatt currently identify wind direction by use of a weather station located on the roof together with and 2 flags located in the front carpark.

## 2.4 Primary risks to the public.

2.4.1 The Treatt major accident scenarios consider the impacts of fire, fire and explosion, chemical fires and or explosion. There are no materials processed or stored on site that will potentially cause a toxic gas cloud.

2.4.2 A fire involving a mixture of chemicals may produce large amounts of smoke and or vapours which may be hazardous to health and or the environment due to the by-products of combustion. A fire or an explosion, may lead to additional hazardous particulates in any smoke plume. [APPENDIX 9](#) details the hazard impacts associated with these risks.

## 2.5 Primary Risk to the Environment

2.5.1 Treatt site risks to the environment are determined under the Major Accident to the Environment (MATTE) definitions. These assessments consider the impacts of fire, fire and explosion, chemical fires and or explosion, and toxic releases.

2.5.2 Those main substances that are held on site and which are classified as dangerous to the environment are citrus oils and their derivatives see [APPENDIX 9](#)

2.5.3 The site is assessed by the Environment Agency in accordance with its ground water protection policy as Medium- High Vulnerability Zone. The location falls between the two definitions of: -

High Vulnerability – Areas easily able to transmit pollution to groundwater. They are characterised by high leaching soils and the absence of low permeability superficial deposits.

Medium Vulnerability – Areas that offer some groundwater protection. Intermediate between high and low vulnerability.

2.5.4 Environmental risks are determined as chemical spillages, by-products of combustion, and by products of firefighting activity. Vectors for transmission are airborne, surface water runoff and drainage into the surrounding land and contaminated equipment and or personnel.

2.5.5 The nearest watercourse which may be subject to a MATTE is the River Lark which is located 1.8km to the south west of the site and flows into the Great Ouse at Littleport Cambridgeshire.

2.5.6 The main risk of a MATTE occurring is that of fire water run off which is produced during a fire, running off site into the public drainage system.

## 2.6 On site countermeasure resources and mitigation

2.6.1 The site has does not have a dedicated emergency response team trained to tackle a fire (other than fighting a small fire with an extinguisher). However, it does have the equipment and trained personnel to mitigate loss of containment events. Treatt also maintains a close working relationship with a local contractor (Acumen Waste Services) who can be swiftly called upon in the event of a major loss of containment on site (4 hour response time 24/7).

2.6.2 The site has a fire detection/suppression system which is zoned and covers all the manufacturing, office and laboratory buildings on site. The fire alarm panels themselves are located within the main reception area of the building.



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2.6.3 On Site Medical Facilities. The site currently has a team of 24 First Aiders, with at least one based in every department. In an emergency a casualty clearance station would be established and Treatt first aiders would treat injuries until the Ambulance Service arrived.

### 2.7 On-site containment – Spillages, surface water and effluent

2.7.1 The operational areas of the site are concrete. There are a number of areas of unmade ground which will be decoratively planted and situated away from process or storage areas.

#### 2.7.2

2.7.3 Although there are bulk storage tanks approximately 80% of raw materials delivered to the site are delivered in drums via a container

2.7.4 Transient raw materials and finished goods are located internally, either in the Manufacturing area or the main Warehouse. The Warehouse is purposely designed for drums storage of flammable liquids and comprises a concrete floor, secondary bunding and drum storage racking (mobile and fixed) with in-rack sprinkler protection.

2.7.5 Spillage kits are located around the establishment. The kits comprise absorbent materials appropriate to the inventory. Employees will be trained to use drain covers. The Site Incident Controller (SIC) can request drains to be covered if this will limit the consequence of the loss of containment.

2.7.6 The drainage system has been designed to route through to interceptors or a lagoon using gravity. From these locations the contents can be tested and either discharged to foul water sewer (under trade effluent consent) or recovered by road tanker for appropriate treatment.

2.8 Fire water run off

2.8.1 All surface drains and yard topography will result in any fire water being contained in the fire water lagoon which has a capacity of 7,700m<sup>3</sup>.

2.8.2 In the remote event of the lagoon failing on demand the contaminated fire water would enter the surface water drains on Skyliner Way and discharge into a balancing pond on route to the River Lark. Treatt hold stock of absorbent booms that can be deployed on this water course to limit the extent of any contamination.

### 3. **Activation, Warning and Informing**

#### 3.1 **Activation of the External Emergency Plan**

The External Emergency plan will be automatically activated when an off-site COMAH Emergency/Major Incident has been declared in accordance with the criteria defined at 1.3.2

**Once the site operator declares an off-site COMAH Emergency this will automatically be declared as a Major Incident for responding agencies.**

The diagram at [3.4.16](#) below gives an overview of the alerting/notification process.

3.1.1 The following have authority to declare an off-site COMAH Emergency and will activate this plan.

The Site Operator or Emergency Services Incident Commander will declare an off-site COMAH Emergency and activate this plan under the direction of one of the following:

- Treatt Site Main Controller (SMC)
- Treatt Site Incident Controller (SIC)
- First Emergency Services responder in attendance
- Emergency Services Incident Commander
- Local Authority Duty Officer (JEPU)

Additionally, the emergency services may activate elements of this plan on the declaration of an on-site incident.

#### 3.2 **Command and Control**

3.2.1 The initial site response will be as directed by the Treatt Site Main Controller assisted by the Site Incident Controller.

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3.2.2 The on-site response will be supported by the Emergency Services until such time as they deem it appropriate to assume overall command of the emergency response. Thereafter, the Treatt emergency capability to support the incident will be as directed by the Emergency Services Incident Commander.

**Should** the on-site Emergency Control Centre be compromised, an off-site ECC can be set up by taking pre-packed “pilot cases” with all the necessary equipment and information regarding the site.

3.2.4 Command and Control of the off-site response will be in accordance with the [Suffolk Resilience Forum Generic Emergency Response Plan](#), i.e. Strategic Coordinating Group (located at StratCC at Suffolk Police HQ, usually chaired by the Police), Tactical Coordinating Group (located at Landmark House Ipswich, usually chaired by Police), and Incident Commander at the scene (Forward Control Point).

3.2.5 It is the aspiration of the local Suffolk responders to hold the first Strategic Coordinating Group meeting within an hour and a half of the off-site COMAH Emergency being declared.

3.2.6 Specific arrangements for the Strategic Coordinating Group can be found in the [Suffolk Resilience Forum Generic Emergency Response Plan](#), Annex C.

3.2.7 Communications between the responding Suffolk Resilience Forum partners will be Airwave radio (Interoperability channels automatically activated by Suffolk Police) and, where available, teleconferencing and Resilience Direct (See SRF Telecommunication and ICT Plan).

3.2.8 Contact details for all Suffolk Resilience partners and other agencies can be found in the Suffolk Resilience Forum Alerting Directory.

3.2.9 Treatt Liaison Officers will attend each of these functions to support the command and control process.

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3.3 Treatt Plant Site Alarm Systems and personnel reactions

3.3.1 The system for alerting on-site personnel of an incident is the fire alarm. all persons on site will evacuate to their respective assembly points.

3.3.2 The Site Operator has agreed to warn neighbouring sites of the declaration of an off-site COMAH Emergency, and this will be carried out by the Site Main Incident Controller.

3.3.3 Emergency response can be initiated by anyone on site by local initiation, or by calling the Reception Office. A more detailed description can be found within the Internal Emergency Plan.

3.3.4 The Suffolk Park establishment has an electronic badging system to record all personnel who are on site at any time. A fire alarm activation will generate a roll call from the badging system. Fire Marshalls will conduct a sweep of the establishment as they exit the establishment. Designated roll callers will check the attendance register against the mustered personnel. Unaccounted personnel would be reported to the Site Incident Controller (SIC) who would instigate a search only if deemed safe to do so, based on the last known position and the location of the incident. If the emergency services are present, this information would be communicated.

3.4 Method of alerting the Emergency Services – [see Diagram at 3.4.16](#)

3.4.1 There is no off-site physical alarm present.

3.4.2 The fire alarm system is connected to a remote monitoring station through the red care system. Either Treatt can notify the emergency services directly or the remote monitoring station can perform this task on behalf of Treatt. During operational hours the SIC/SMC are responsible for this decision. Outside operational hours the remote monitoring station will notify Suffolk Fire and Rescue directly.

3.4.3 Out of hours, the monitoring station will notify Suffolk Fire and Rescue. The site has in place a duty manager system to provide coverage and response in the case of an incident.

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3.4.4 A Premises Information Box is attached to the external aspect of the administration building which will contain relevant information for the emergency services attending the site, particularly outside of normal operating hours. The information will include the brigade operational risk plans, fire zone plans as well as keys and codes to access the premises.

3.4.5 On receipt of an alarm activation for a COMAH off-site emergency the Site Incident Controller will immediately make a 999 call to the Combined Fire Control and provide a summary assessment of the incident details and indicate if known, whether this is an on-site or off-site incident. Additional to that assessment, the Site Incident Controller will also advise of the initial support to contain the incident and request the appropriate Suffolk Fire and Rescue Service pre-determined attendance for a Fire, Chemical Fire or Chemical Spillage. They will also initiate a site shut down (including restrictions to access and egress to the site). Additionally, they will coordinate a roll call of all staff and visitors.

3.4.6 The Treatt Site Incident Controller/Emergency Service Liaison will also provide incident update details to the Combined Fire Control, including any relevant firefighting technical and or environmental information as known for the products involved in the incident (e.g. 'Instructions in writing' details for either specific product or assessed hazards) until such time as Suffolk Fire and Rescue Service are in attendance, and that information can be passed directly to the Suffolk Fire and Rescue Service Incident Commander in order to ensure the appropriate responses can be set in train.

3.4.7 The assessments of the incident nature, scale or casualties being reported should use a suitably consistent reporting format using the METHANE mnemonic as used by the Emergency Services which is essential to enable the appropriate responses to be made.

### [APPENDIX 13](#)

3.4.8 Emergency Services' Rendezvous points (RVP) will be identified by the first emergency service that arrives on site in consultation with the Site Incident Controller. It is important that this location is in a safe location taking in account the prevailing wind conditions and nature of the incident.

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3.4.9 The Forward Control Point (FCP), if not one of the predesignated RVP locations, (para 3.4.10) must be an area where non intrinsically safe communications may be used by all responding agencies, large enough to be accessible safely by multi-agency vehicles staff, and freely accessible. This location will normally be identified by the Suffolk Fire and Rescue Incident Commander. It is important that once identified all other emergency responders are aware of the location.

**3.4.10 The use of airwaves radios on site should be a multi-agency agreement based on benefit/risk decision made in consultation with the site operator.**

3.4.11

3.4.12 Suffolk Fire and Rescue Service will support an Off-site COMAH Emergency with the provision of one Command Vehicle to coordinate the emergency firefighting response on site and provide the Forward Control Point location for the multi-agency operational response activity to take place. It should be noted that the provision of the command vehicle will take some time.

3.4.13

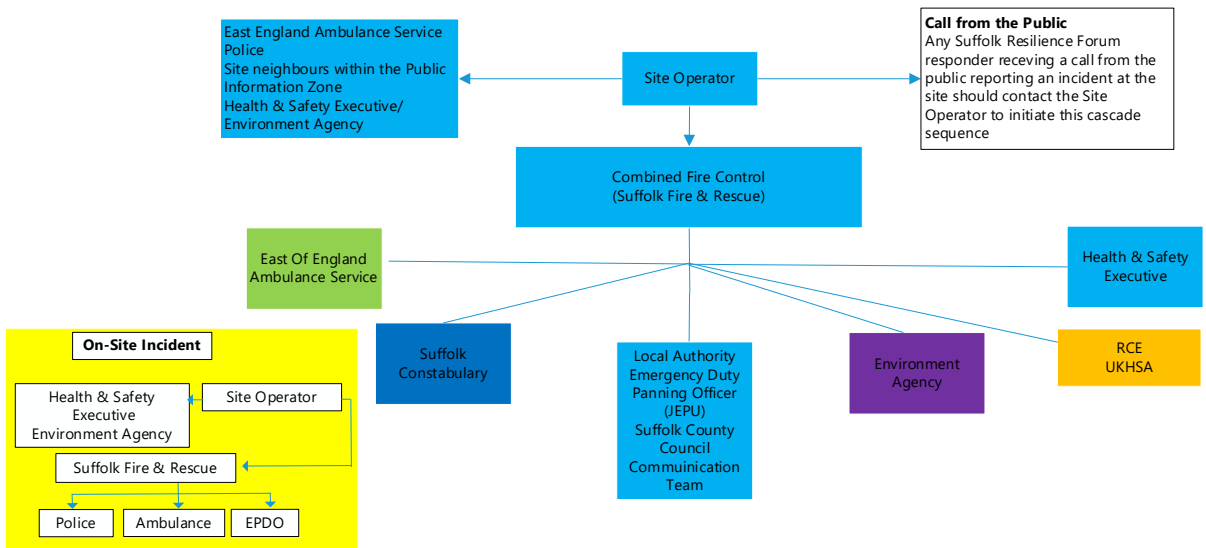
3.4.14

3.4.15 Helicopter landing zones

None designated although Rougham airfields is situated approximately 600m to the NE of the site.



3.4.16 Overview of alerting and notification process.



Suffolk Fire & Rescue	Suffolk Constabulary	East of England Ambulance Service	Emergency Planning Duty Officer & Suffolk CC Comms	Environment Agency	RCE UKHSA
Pre Determined Attendance	Internal Health & Safety	HART	<b>District / Borough</b>	Food Standards Agency	UKHSA – East of England
Suffolk Constabulary	Suffolk CC Highways	UKHSA	Local Authority Management Team	Water Companies	
Ambulance Service	National Highways	RCE	Environmental Health	DEFRA	
Emergency Duty Planning Officer	Local Insp / Sgt	NHS England	Emergency Planning Officers	Agricultural Abstractions	
EA	Duty Press Officer	ICB'S	Communication Team	HSE	
HSE	Duty Superintendent*	Local NHS Hospital Trust	-----	Natural England	
SCC Comms	Resource Management		<b>Suffolk CC</b>	Suffolk Wildlife Trust	
RCE UKHSA	Neighbouring Forces		Communication Team		
	NPoCC		Growth Highways and Infrastructure (GS&I)		
	* On call Supt will initialise call out to setup a command structure		JEPU		
			Resilience Team (RED)		

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### 3.5 Method of Warning Workforce

3.5.1 The site has a single fire alarm system and on activation all staff are required to attend the primary assembly points. The site emergency alarm is a continuous ringing bell for a prolonged period.

3.5.2 On the activation of the site alarm all staff are required to immediately evacuate their buildings/areas and go to the roll call assembly point. (If the initial assembly point is comprised due to the incident staff will be redirected to alternative assembly points which will be identified by the Main Site Controller).

3.5.3 The Site Incident Controller will advise the Roll Call coordinators at the assembly point of any incident details pertinent to safeguarding of staff at those locations.

3.5.4 On the alarm activation designated roll call coordinators conduct a roll call at the pre designated locations using the information from the electronic badging system printout

### 3.6 Off-Site Notification

3.6.1 Although the sites PIZ has no premises within it other than Treatt, the site's ECC on activation of the alarm has agreed to make contact with the neighbouring sites/businesses informing them of the nature of the emergency, and confirm it is an on-site incident or likely to escalate to an off-site COMAH Emergency.

3.6.2 The COMAH alarm is the sites fire alarm. The alarm can be heard (subject to the prevailing wind) throughout the Public Information Zone and further afield.

3.6.3 The activation of the COMAH alarm is as directed by the personnel at [3.1.1](#)

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3.6.4 Whilst traffic control points have been pre identified (3.4.13 refers) to manage access and egress around the site, coordination and management of cordons and access routes will be as directed by Suffolk Fire and Rescue Service and Police in order to prevent and minimise public exposure to any consequential effects of an incident occurring on site.

3.6.5 The initial advice to all persons within the Public Information Zone is to turn off/douse any naked lights outside their premises, 'Go in' - close all doors, windows and forced air ventilation, 'Stay in' - until further notice and 'Tune in' - to local radio for further information.

3.6.6 Once wind direction is confirmed, priority notification to the public will be based on the area affected taking into account the estimated plume width (Chemical and Metrological modelling – CHEMET) as requested by Suffolk Fire and Rescue Service. This is also available to Emergency Planning Officers on the Meteorological Office Hazard Manager service.

3.6.7 If the assessed off-site hazards within the Public Information Zone are such that evacuation is preferable to shelter, this will be led by the Police. It is unlikely the latter advice is given within the first hour of the incident. If required rest centre locations will be identified and staffed by West Suffolk Council

3.6.8 Escalation of the incident may require wider areas to be considered for evacuation.

3.6.9 Immediately post incident, all participating agencies will use the processes (see 3.6.1) above to advise the public that the incident has been brought under control.

3.6.10 The media response during and after an off-site COMAH Emergency is described in section 4 below.

#### 4. **Media Arrangements**

4.1 On notification of an off-site COMAH emergency the Combined Fire Control will alert Suffolk County Communications that an incident is taking place. Suffolk County Council Communications will advise the locally elected members for the Suffolk County Council Divisions.

West Suffolk Communications will advise the locally elected members for West Suffolk Council and will also update Bury Town Council, Rushbrooke with Rougham Parish Council.

In the first instance Treatt media representatives will make contact with Suffolk County Council Communications.

4.2 The Strategic Coordinating Group (Media Coordination Cell) will determine how information to the public will be disseminated to provide ongoing advice to those persons and vulnerable groups both within (and if necessary, outside) the Public Information Zone<sup>4</sup>. All media responses to an off-site incident will be in accordance with the [SRF Communication Plan](#).

4.3 The following agencies are able to offer specific advice as follows:

- The Environment Agency/UKHJSA will advise regards any outstanding issues to Air quality
- The Environment Agency will advise with regards to any incident resulting in pollution of the environment.
- UKHSA will advise regarding health impacts and advice
- Food Standards Agency will advise regards any outstanding issues to environmental health aspects regards locally produced foods, either for domestic or commercially consumption.
- The Local Authority Environmental Health or the Environment Agency will advise regarding contaminated land issues.

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<sup>4</sup> Reg 26(5) COMAH Regs 2015

5. **Roles & Responsibilities**

- The [SRF Generic Emergency Response Plan](#) identifies main roles and responsibilities of responding agencies. Those listed below are site specific for this plan.

5.1 **Site operator**

- Declare Off-Site COMAH Emergency, inform Combined Fire Control (999)
- Activate Emergency teams and Main Control Room
- Assess situation, identify substances and potential volumes involved, collate information, continue to advise emergency services and maintain log.
- Determine wind direction and advise emergency services of appropriate RVP
- Alert workforce.
- Alert off-site neighbouring premises, commercial sites, residential properties etc as required by External Emergency Plan PIZ.
- Provide liaison officer to Emergency Services RVP with access to Safety Data Sheets, 'UN/Trem card' details for transported substances, to support emergency responders and other agencies requiring technical information.
- Provide Technical Liaison Officer (Senior Manager) to SCG
- Provide Technical Liaison Officer (Senior Manager) to TCG
- Call in appropriate management staff.
- Provide media representative at the forward Media Liaison Point as set up by Police and provide liaison with the Multi-Agency Strategic Co-ordinating Group (SCG) if established otherwise TCG.
- Notify HSE & EA of incident.
- Advise, as briefed by Fire/Police, neighbouring premises, commercial properties residential properties etc. when safe to return to place of work/residences.
- Liaise with Environment Agency post incident for recovery of site and mitigation of on- and off-site environmental consequences.

5.2 Fire & Rescue Service

- Activate the Treatt Major Incident Plan and consult Operational Risk Information Fire Wallet.
- Despatch officer to Emergency Services RVP.

5.3 Suffolk Constabulary

- Activate Emergency Plan Teatt
- Establish a command structure
- Assist with the multi-agency response to traffic management in the event that there are road closures.
- Facilitate information sharing via an Airwave interoperable talk group.
- Participate in a multi-agency media plan.
- Dispatch an officer to the Emergency Services RVP

5.4 Ambulance service

- Despatch officer to Emergency Services RVP
- Mobilise on call NILO to RVP
- Confirm on-site facilities for casualty management and decontamination etc.
- Inform NHS England, UKHSA, Chemical Radiological and Environmental Hazards (RCE) If Major Incident is declared notify neighbouring Ambulance Services
- Deploy HART Team

5.5 Integrated Care Boards (ICB)

- Source NHS support to Local Authority emergency reception centres as appropriate
- Liaise with Local Authority and Police regarding vulnerable persons

5.6 UKHSA

Contact emergency responders to ascertain details of the incident

- Undertake public health risk assessments
- Undertake exposure assessments
- When appropriate, convene a Science and Technical Advice Cell (STAC)
- When appropriate, the Environment Agency and UKHSA will convene an Air Quality Cell (AQC)
- Provide information and public health advice direct to emergency responders and multi-agency groups (e.g. about the toxic effects of released chemicals, protective actions to be taken to protect health, health surveillance, and the need for a major incident health register)
- Provide public health advice to the Fire and Rescue Service's Incident Commander regarding the use of a 'controlled burn'
- Advise emergency responders on the health considerations of response decisions (e.g. evacuation versus sheltering decisions)
- Provide health messages for multi-agency media statements
- Provide information to GPs, hospital staff and public health staff based in Local Authorities via DPH and ICB
- Provide public health advice in the recovery phase of an incident

5.7 Environment Agency

- Activate the Air Quality Cell via the 24/7 National Air Quality Technical Advisor (NAQTA).
- Via the Air Quality Cell, consider and advise on the risk to the environment from air quality.
- Lead on water pollution incidents from land based sources.
- Support mitigation and containment through deployment of EA pollution control equipment where safe to do so.
- To investigate, sample and collect evidence where safe to do so for analysis, future enforcement and cost recovery.
- Attend the multi-agency response at FCP, TCG & SCG etc. as appropriate.
- Advise on environmental impacts to SCG via STAC, and COBR via SAGE.
- Warn water abstractors so they can take appropriate action.
- To provide specialist advice on waste management, environmental pollution and hazardous sites, including during recovery and clean-up.
- To provide warnings of flooding via the Floodline Warnings Direct system to professional partners, media, business and the community.
- Maintain and operate flood defences on certain specified rivers and coastlines.
- Participate in coordinated media engagement where appropriate, can assist with media messages and would offer the assistance of communications experts to any media cell.

5.8 National Highways

- Through the managing agent contractor provide ongoing support to traffic management including public information and shrinkage
- Through the managing agent contractor provide and maintain temporary or permanent road closures
- Initiate the variable matrix signs situated on the A14 and approach roads advising motorists of the incident.
- Through the managing agent contractor repair and, where able, improve roads and infrastructure.



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- Clear debris from those roads and other places for which National Highways has responsibility.
- Support the management of the day-to-day operation of the network (by Eastern Region Operations Centre and mobile patrols within the affected area, including minor improvements, congestion relief, encouragement of alternative travel modes and reviewing the adequacy of the current network and planning for the future)

### 5.8 Anglian Water/Essex & Suffolk Water

- Activate relevant Emergency Plan

### 5.9 Local Authority

#### Suffolk County Council

- Activate Joint Emergency Response Plan. . – Parts 2-10 and Part 4
- Provide public health support for STAC

#### West Suffolk Council:

- Activate Joint Emergency Response Plan. – Parts 2-10 and Part 4

### 5.10 Food Standards Agency

- Advise Public on food safety matters
- Testing sampling and analysis of areas affected by hazardous substances

### 5.11 Health and Safety Executive

- Investigate cause and the emergency response arrangements and take appropriate action

## 6. **Recovery**

### 6.1 Overview

Recovery is an integral part of the emergency management process and starts in the Response Phase, normally with the formation of a Recovery Coordination Group as a strategic decision taken by the Strategic Co-ordinating Group (SCG). Local authorities may be handed the role of leading the multi-agency Recovery Phase relatively quickly, depending on the type of incident and its impact.

Inclusion of Treatt in this process is vital to ensure the early restoration of normality is achieved.

This plan should be read in conjunction with the [SRF Recovery Plan](#). For the purposes of this plan, recovery is defined as:” *The process of rebuilding, restoring and rehabilitating the community following an emergency.*” (*“Emergency Response and Recovery”, HM Government*)

### 6.2 Environmental clean-up and restoration

The remedial measures should be proportional to the amount of harm caused by the accident, and to the likely level of continuing harm to people and the environment. The operator has a duty to take remedial measures to mitigate the effects of major accidents under regulation 5 of COMAH and under other environmental legislation such as the Water Resources Act 1991 and the Wildlife and Countryside Act 1981.

6.3 Environmental Recovery issues

- Removal of debris and cleansing of effected area
- Segregation and containment of waste products and cleansing of effected area
- Segregation and containment of contaminated water
- Removing, cleaning and or replacing contaminated soil
- Identifying restrictions on foodstuffs (commercial or domestic)
- Restricting access to contaminated areas (agricultural or commercial usage)
- Removal of dead animals
- Restocking watercourses, lakes
- Remedial action on surface and groundwater supplies
- Restoration of vegetation, habitats and re-introduction of animal and plant species
- Using qualified appropriately accredited/registered and licensed disposal contractors

**7. Review and Exercising of Emergency Plans**

7.1 The Review and Testing of the off-site emergency plan (in accordance with COMAH Regulations) shall be undertaken at periods of no greater than 3 years.

- Arrangements to test the plan to such extent as is necessary are undertaken by the Multi-agency partnership of the Suffolk Resilience Forum.
- Any such review and revision of the plan shall take into account any changes reflected in; legislation or guidance, operating procedures and processes or changes to top and lower tier status of materials held or processed on site by Treatt, new technical knowledge and knowledge concerning the response to major accidents.

7.2 Page vii (Exercise Log) details the date, type of exercise and any pertinent comments and should be completed each time this plan is exercised or reviewed.

7.3 The arrangements, commensurate with the COMAH Regulations and Guidance, for exercise planning are detailed within the Suffolk Resilience Forum Protocol for Multi-Agency Exercise Planning for Suffolk.

**Appendices:**

- A COMAH Agenda
  - 1. Treatt – HSE Public Information Zone
  - 2. Treatt – Map of Rendezvous Points
  - 3. Traffic Control Points
  - 4. Treatt – Site Plan
  - 5. Treatt – Aerial Photograph of Site
  - 6. Treatt - Muster Points
  - 7. Treatt - Major Accident Hazard Locations
  - 8. Treatt - Drainage plans
  - 9. Treatt – Listed Materials and Hazard Data
  - 10. At Risk Populations and Areas
  - 11. Local Infrastructure and Industrial Activities
  - 12. Consultation details
  - 13. METHANE
  - 14. Media Action Card

**Appendix A COMAH Agenda**

1. Attendees and Apologies
2. Agencies currently in Major Incident
3. Brief Incident Overview and Situation Awareness 1<sup>st</sup> meeting only
4. Any Urgent Issues
5. Update on Actions / Tasks from Last Meeting
6. MAIC Update (After 1<sup>st</sup> Meeting and only if activated)
7. Updates from Key Agencies
  - Site Operator
  - Suffolk Fire & Rescue
  - East of England Ambulance
  - Met Office
  - Suffolk Constabulary
  - Environment Agency
  - Local Authority
  - SCC Highways (PPG – footpath officer also required)
  - National Highways (Calor Gas, Treatt, PPG only)
  - Rail Operator (Calor Gas, PPG only)
  - British Transport Police (Calor Gas, PPG only)
  - UKHSA
  - ICB /NHS
  - Essex/Cambridgeshire LRF (IFF only)
  - Other Agencies as required.

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8. Declaration of Major Incident Required (SCG/TCG Chairs identified)
9. Need for National Alert,  
  
has one been issued  
Is there a need for one to be issued  
If issued, is it still required or can it be cancelled
10. Identification of Vulnerable Groups / Persons / Locations at Risk
11. Muti Agency Information Cell (MAIC) Required
12. Resilience Direct Pages and or Agency reports required? (Only applicable if MI not declared)
13. Comms Messages Agreed
14. Activation of Vols Orgs Required (4x4 cell etc)
15. AOB
16. Review of Actions / Task Agreed
17. Date / Time of next meeting

**Appendix 1 – Treatt – HSE Public Information Zone**

**PIZ SHOWN IN RED**





Appendix 1 – Treatt – HSE Public Information Zone



**Appendix 2 – Rendezvous Points**

**Treatts**

**Appendix 3 - Traffic Control Points**

**Treatts**

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**Appendix 4 – Treatt Site Plan**

Appendix 5 - Aerial Photograph of Site



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**Appendix 6 - Muster Points**

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**Appendix 7 - Treatt MAH Locations**

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**Appendix 8 - Treatt Drainage Plan**





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**Appendix 10 – At Risk Populations and Areas**

<b>3.5.1 - Commercial sites:</b>	<b>Relation to site (N E W S)</b>	<b>In Public Information Zone</b>
Treatt (Main Site)	N/A	Yes
Bury St Edmunds Audi Skyliner Way Bury St Edmunds Suffolk IP32 7YB	W 90m West	No
Jack Sealey Ltd Kempston Way Bury St Edmunds Suffolk IP32 7AR	80 m West	No
Bobby's Foods Ltd Skyliner Way Bury St Edmunds Suffolk, IP32 7YB	30m West	NO

<b>3.5.2 Residential areas</b>	<b>Estimated Populations</b>	<b>Relation to site (N E W S)</b>	<b>In Public Information Zone</b>	<b>Distance from site</b>
Morton Hall Residential Estate	8052	N NW	No	

<b>3.5.3 - Schools &lt; 2.4km</b>	<b>Address</b>	<b>Relation to site (N E W S)</b>	<b>Distance from site (m)</b>	<b>Number of pupils</b>	<b>In Public Information Zone</b>
Sybil Andrews Academy	Secondary School	N	100	600	NO
Abbots Green	Primary School	NNW	670	441	NO
Tassel Road	Day Nursery	NW	1,000	20	NO
Little Angels	Day Nursery	WSW	830	18	NO
First Base	Educational Support	NNW	670	12	NO

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Environmentally Sensitive Locations < 1km of the site <sup>5</sup>	Nil - 250m from site	251 - 500m from site	501 - 1000m from site
1:250,000 Solid Geology			
Borehole Index	-	-	1
Areas of Outstanding Natural Beauty	-	-	-
National Parks	-	-	-
National Nature Reserves	-	-	-
Abstractions Licenses	-	-	1
River Quality Survey	--	--	--

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**Appendix 11 - Local infrastructure and Industrial Activity**

**Local infrastructure.**

- Treatts is situation on the Suffolk Park establishment is located on the outskirts of Bury St Edmunds, comprising of a 6acre development within a 10acre plot. The development includes production areas, tank farm, warehousing, office, and laboratory facilities. The site is set approximately 63m above sea level and is predominantly flat in elevation, with a gentle slope towards the south of 1:140.
- The main route of access to the Suffolk Park site is via Lady Miriam Way from the Eastern Relief Road accessible from A14 Junction 45 or alternatively Junction 44, There are no specific restrictions hindering a response from the emergency services. The alternative access from Junction 44 of the A14 through the existing Suffolk Business Park provides two routes via either Skyliner Way or Kempston Way. If the A14 junctions were inaccessible, then access can be achieved from the A143 using Orttwell Road and Mount Road.
- There are a number of is an educational premises within the vicinity of the site and a leisure center (Skyliner) situated to the north of the Treatt site

<b>Name</b>	<b>Type</b>	<b>Number of pupils</b>	<b>Distance</b>	<b>Direction</b>
Sybil Andrews Academy	Secondary School	600	100	N
Abbots Green	Primary School	441	670	NNW
Tassel Road	Day Nursery	20	1,000	NW
Little Angels	Day Nursery	18	830	WSW
First Base	Educational Support	12	670	NNW

- There are also a number of leisure facilities situated within the vicinity of the site

<b>Name</b>	<b>Distance</b>	<b>Direction</b>
Skyliner Leisure Centre	100	N
Unit 1 Gym	530m	WSW
Revolution Fitness Academy	455m	W
Sports Direct Fitness	805m	WSW

- There are three existing businesses on the opposite side of Lady Miriam Way on the western boundary to the site. These are a car showroom and two wholesale distribution warehouses none of which pose an increased risk or consequence of a major accident.

<b>Name</b>	<b>Address</b>	<b>Type</b>	<b>Distance from Site</b>
Bury St Edmunds Audi	Skyliner Way Bury St Edmunds Suffolk IP32 7YB	Car Showroom	90m West
Jack Sealey Ltd	Kempston Way Bury St Edmunds Suffolk IP32 7AR	Wholesaler (Garage Equipment)	80m West
Bobby's Foods Ltd	Skyliner Way Bury St Edmunds Suffolk, IP32 7YB	Wholesaler (Food)	30m West

- Two distribution warehouses have been built to the South East, one of which has been let to Unipart Logistics for a National Health Service warehouse. The other has been sold to MH Star UK Ltd for home and garden product distribution
- There is a small private grass (760m x 18m) airfield located at the former RAF Rougham Airfield, which is approximately 600m to the NNE to the Treatt site . The runway runs east-west, with the extended area subject to height restrictions being 400m North of the proposed site.
- The Rougham Industrial site is situated to the east of the site which contains a number of industrial units carrying various activities.

<b>Name</b>	<b>Type</b>	<b>Distance from Site</b>	<b>Direction from Site</b>
Rougham: Radar Building	Museum	800m	ENE
RAF Rougham Tower	Museum	800	ENE
The Battlies House	House	1.7km	ENE
Lodge to Moreton Hall School	House	1.45km	WNW
Moreton Hall School	School	1.55km	WNW

- There are no 1 Grade 1 buildings , however there are 5 Grade 2 buildings within 1.7 kms of the site
- There are no overhead national grid electrical distributions running across the site.
- There is no assessed usage of the land beneath the site that could contribute to a major accident on the site.

**Local Population**

- The Treat site is situated within the Morton Hall ward and in 2108 the total pollution was 8052 and a total of 976 business of different sizes

**Local environment**

- The site sits above a chalk aquifer with high soil permeability.
- The nearest surface watercourse to the Treatt site is the River Lark, located 1.8km to the South West. In general, the river flows from the South East to the North West
- There is 1 licensed groundwater abstraction location located at Morton Hall School
- There is 1 Site of Special Scientific Interest (SSSI) within a 2km radius of the Treatt site that being The Glen Chalk Caves

Name	Location	Type	Relation to and distance from site
The Glen Chalk Caves	Bury St Edmunds Suffolk	SSI	1.9kms NW
Morton Hall Community Woods	Bury St Edmunds	Local Nature Reserver	1.1 kms NW
Horinger Court Caves	West Stow Suffolk	SSI	4.6 kms WSW

- There are no Special Areas of Conservation within a 10km radius of the site.
- There are no RSPB Reserves within a 10km radius of the site. However, there are 50 listed sites (either nesting or breeding sites) for Farmland birds within 5km of the Treatt site

**Industrial Activity**

- The site deals mainly with the manufacture and supply of products from essential oils and natural fractions to speciality aroma materials
- The normal operational hours of the site are
- 24 hrs Monday - Friday

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## Appendix 12 – Consultation Details

### Consultees

- Suffolk Resilience Forum (multi-agency COMAH off-site Working Group partners for Treatt).
- Treatt.
- County, District and Parish Council Elected Members
  - Suffolk County Council – Eastgate and Moreton Hall  
Thingoe South
  - West Suffolk Council – Morton Hall Ward
  - Bury Town Council.
  - Rushbrooke with Rougham Parish Council

## Appendix 13 – METHANE

**METHANE**

<b>M</b> ajor Incident	Major incident declared? (Include date & time of declaration)	
<b>E</b> xact Location	Exact location/geographic area of incident <b>What Three Words</b>	
<b>T</b> ype of Incident	Flooding/Fire/Utility Failure/HazMat/Disease outbreak etc.	
<b>H</b> azards	Present or suspected	
<b>A</b> ccess	Routes that are safe to use, any inaccessible routes and RVP's	
<b>N</b> umber of Casualties	Numbers, type and severity	
<b>E</b> mergency services	Present and those required	

**Appendix 14**

**MEDIA ACTION CARD**

During an Off-Site COMAH Emergency Incident at Treatt PLC Bury St Edmunds it is suggested that the following agencies communications departments are involved in developing the Media Strategy.

Reference should be made to the SRF Communications Plan

Holding statement

An incident at Treatt PLC has been reported to the Emergency Services for Suffolk. As part of the response, the TREATT External Emergency Plan has been activated. Residents within the Public Information Zone are advised to; Go in, Stay in and Tune in".

Agencies

Suffolk County Council will be the lead Communications department as Suffolk Fire & Rescue Service will be the lead agency.

It is suggested that the following agencies should be involved in the media and communication cell

Treatt PLC

Environment Agency

Suffolk Constabulary

Suffolk County Council

West Suffolk Council

East of England Ambulance Service

NHS England Improvement

UKHSA

West Suffolk Integrated Care Board

Anglian Water