

7th March 2023

ASEnv_OSI_056

Version 1.1

Operational Safety Instruction

Pollution Prevention

It is the responsibility of all employers to ensure that relevant OSIs are brought to the attention of their staff. However, individuals remain responsible for their own actions and those who are in any doubt should consult their Supervisor or Manager.

1. Introduction

- 1.1** The purpose of this Operational Safety Instruction (OSI) is to advise and remind all airport companies of;
- 1.1.1** The airport byelaws and requirements for environmental pollution prevention.
 - 1.1.2** Their responsibilities are to prevent, wherever possible, pollution to land, groundwater and receiving water courses and to ensure compliance with permits, licenses and consents.
 - 1.1.3** Their duty to enable a prompt and effective response to all incidents that occur at Heathrow Airport which are, or could be harmful to the environment.
- 1.2** Red bars have been added at the side of the document to draw the reader's attention to where changes have been made.
- 1.3** This OSI should be read in conjunction with the reference documents as stipulated therein.
- 1.4** This OSI replaces ASEnv_ OSI_056 Pollution Prevention V1.0.

2. General

- 2.1** Heathrow Airport Limited (HAL) is committed to minimising the impact of its business on the environment and local communities, by acting responsibly and continuously improving its environmental performance.
- 2.2** Airports are subject to a number of environmental controls in common with other major industries. Minimising pollution from routine operations or emergency situations is an essential operating requirement of all airline/operating companies.



- 2.3** The emphasis rests firmly on the avoidance and minimisation of risk, and all practical steps should be taken to prevent pollution by means of training, awareness of legislation, good maintenance of equipment and good working practices.
- 2.4** Companies operating at Heathrow Airport should be aware of and have regard for the following documents (and any subsequent amendments) relating to the environmental pollution practice.
- 2.4.1** OSI AEnv_OSI_059 Airside Environment Incident Reporting
 - 2.4.2** OSI AEnv_OSI_057 De/Anti-Icing Fluid Management Reporting Procedures
 - 2.4.3** OSI ASGrOps_OSI_019 Fuelling of Aircraft
 - 2.4.4** OSI AEnv_OSI_061 Disposal of Pollutants, Oils and Lubricants and Other Hazardous Waste
 - 2.4.5** OSI AEnv_OSI_058 Waste Management and Disposal including Aircraft Catering Waste

3. Polluter Pays

- 3.1** It has become an established principle of Environmental Law that when cleaning up the consequences of a pollution incident 'The Polluter Pays'. In all cases, this principle will be applied at Heathrow Airport.
- 3.2** Where facilities are provided by HAL, the user must ensure they are used correctly. Examples include but are not limited to;
- 3.2.1** Waste compactors
 - 3.2.2** Battery charging points
 - 3.2.3** Vehicle and aircraft washing areas
 - 3.2.4** Sanitation blocks
- 3.3** Failure to use these areas correctly will result in any costs associated being charged to the airline/operating company and possible prohibition of the use of facilities in future.
- 3.4** All airline/operating companies shall ensure that they implement controls in accordance with the Environment Agency's guidance of best practices. Further information can be found at <http://www.netregs.gov.uk/>

4. Sanitation Blocks

- 4.1** The sanitation blocks are for the disposal of aircraft toilet waste only. No hand wipes, cleaning wipes or rags should be disposed of in sanitation blocks.



4.2 Companies using the sanitation blocks must only discharge their waste over the drain aperture.

4.3 Any waste not completely contained within the drain must be washed down with the supplied water hose.

5. Surface Water

5.1 Only rainwater that has run off from roofs and uncontaminated surface areas (and de/anti-icer used for safety requirements) is allowed to drain to open water (rivers, streams, lakes) via the surface water drainage system. In order to remain compliant with consent, HAL has in place strict controls over activities, which are monitored and reported.

5.2 All airline/operating companies are required to have appropriate controls in place and implement best practice techniques to ensure they comply with all environmental legislation and HAL procedures, minimising all spills as far as possible. Areas to be considered include, but are not limited to;

5.2.1 Above-ground chemical and oil storage tanks, drums, bowsers and bulk containers

5.2.2 Below-ground chemical and oil storage

5.2.3 Disposal of waste liquids including chemicals and oil

5.2.4 Prevention and mitigation of spillages

5.2.5 Aircraft (wet/dry) and vehicle washing and maintenance

5.2.6 De-watering and construction run-off

5.2.7 Anti/De-icing

5.2.8 Waste storage areas and compactors

6. Foul Drainage System

6.1 Effluent unsuitable for discharge to the environment should not be discharged to Thames Water Utilities PLC treatment plants. This includes, but is not limited to, effluent from cleaning operations, water contaminated with oils, greases, chemicals, solids and food waste.

6.2 Vehicle and aircraft wet/dry washing & maintenance activities must only take place in designated areas. For details of designated areas or to inform HAL of planned sites, prior to use, contact the Airport Control Engineer at 020 8738 0034.

7. Land

7.1 Release of liquid through spills or leaks onto the unmade ground (soil or grass areas) will cause contamination to the land and possibly the groundwater.



- 7.2** Any intrusive ground works carried out must be approved through the appropriate HAL contact and include a qualified professional assessment of land quality. This may require remediation if advised.

8. Incident Response

- 8.1** An incident is defined as an event, condition or behaviour which has or could have resulted in harm, loss or damage to the environment. This includes but is not limited to;

- 8.1.1** Spills of liquids (e.g. milk, alcohol, sewage) or chemicals (acids, alkalis, detergents, aviation fuel, petrochemicals etc.)
- 8.1.2** Release of gaseous pollutants
- 8.1.3** Fly-tipping and incorrect segregation of wastes
- 8.1.4** Emissions of noise, dust, smoke, odour, light or vibrations in excess of agreed or acceptable limits
- 8.1.5** Breaches of environmental permits, Licenses and consents

- 8.2** In the event of an environmental incident please refer to OSI AEnv_OSI_059 Airside Environment Incident Reporting Procedures

- 8.3** It is a requirement, that all companies operating Airside ensure they have an appropriate mitigation in place for spills. This includes spill kits and clean-up procedures for the materials and chemicals they use. Training for colleagues in their use and awareness of OSI AEnv_OSI_059 Airside Environment Incident Reporting Procedures is also required.

9. Enquiries

Any questions regarding the contents of this OSI should be referred to the Airport Control Engineer at 020 8738 0034.

10. References

- 10.1** AEnv_OSI_059 Spillage and Incident Reporting Procedures
- 10.2** AEnv_OSI_057 De/Anti-Icing Fluid Management Reporting Procedures
- 10.3** ASGrOps_OSI_019 Fuelling of Aircraft
- 10.4** AEnv_OSI_061 Disposal of Pollutants, Oils and Lubricants and Other Hazardous Waste
- 10.5** AEnv_OSI_058 Waste Management and Disposal including Aircraft Catering Waste
- 10.6** www.netregs.gov.uk



Document Data

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| Author Name Paul Wiggins | Approval Name Lisa Allen | Technical Approval Name Jakub Hajko |
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Document History

| Revision | Description of Change | Date |
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| v0.1 | Initial draft by ST | 18 th October 2016 |
| v0.2 | Amended by SD | 15 th May 2017 |
| v0.3 | Amended by ST | 16 th May 2017 |
| v0.4 | Reviewed by MM | 18 th May 2017 |
| v1.0 | Final for issue | 26 th May 2017 |
| v1.1 | Updates on sanitation block information, and contact details for vehicle/ aircraft designated washing areas. | 7 th March 2023 |

