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Control of Major Accident Hazards (COMAH)

External Emergency Plan

Treatt PLC
Northern Way
Bury St Edmunds
Suffolk
IP32 6NL

Author:	Joint Emergency Planning Unit on behalf of SRF
Date:	January 2022
Review:	January 2025
Version	Issue 3

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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
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			
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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

DLUHG Resilience and Emergencies Division

East of England Ambulance Service NHS Trust

Environment Agency

Food Standards Agency

Health and Safety Executive

UKSHA

West Suffolk Clinical Commissioning Group

NHS England

Suffolk Constabulary

Suffolk Fire and Rescue Service

Suffolk Joint Emergency Planning Unit (for Suffolk County Council)

Suffolk Libraries Bury St Edmunds (sanitised)

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Exercise Log

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

Date	Exercise	Type	Comments
10/2/16	Aroma	TTX	Validation exercise
16/1/19	Aroma19	TTX	3 yearly COMAH exercise
1/12/21	Aroma 21	TTX	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:¹

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 Objectives²

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.

¹ Reg 2 COMAH Regs 2015

² 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 Northern Way Bury St Edmunds IP32 6NL

Director of Operations (email and phone)

Engineering & Site Services Manager (email and phone)

1.4.2 Emergency Contact Details

Reception	Mon - Fri 0600 hrs - 2145 hrs	01284 702500
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1.5. Site Information

1.5.1 Treatt PLC is situated in Northern Way Bury St Edmunds. Its main operation is the distillation of citrus and essential oils into ingredients predominantly for the food, beverage and fragrance industries.

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

0600 hrs – 2145 hrs Monday to Friday

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There are occasions during busy period when the site may be operating over a 24 hour period.

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

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 843 666

What three words **anchorman.eyelashes.reboot**

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

1.5.7 Site Access and Egress

The Treatt site is divided into two parts by Northern Way as follows:

The main reception to the site is situated in Building 1.

1.5.8 Public rights of Way:

Northern Way is a public highway which splits the site into two parts and is the main access road for the Northern Way Industrial Estate from Mildenhall Road. (Note: Northern Way is not within the PIZ although it splits the site in two).

There is a large housing estate which is situated adjacent to the south of the site (Mildenhall / Howard Road estate).

The site is protected by security fencing on all four sides as well as access gates to the site that are closed and locked during periods when the site is unmanned.

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 has identified 12 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 of both sites not including Northern Way.

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 PIZ³ in accordance with Regulations 17 & 18 of The COMAH Regulations There are no additional sites within the PIZ.

³ 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. Treatt currently identify wind direction by use of a flag outside Building 1 and a weather station which is situated within the main reception.

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](#)

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2.5.3 The site is assessed by the Environment Agency as a Source Protection Zone II (i.e. pollutants permeating into the ground water could contaminate the public water supply within 400 days).

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 approximately 500 metres to the east 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 and then into the River Lark. **This is particularly relevant to the northern part of the site.**

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 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 system which covers all the manufacturing, office and laboratory buildings on site. The system is zoned for each of the northern and southern sites which will allows the alarm to sound an evacuation for the relevant site and an intermittent alarm on the other site, warning that there is an incident.

2.6.3 On Site Medical Facilities. The site currently has a team of 16 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 Most of the operational areas on the site are concreted, with tarmac roadways and transport areas. There are a number of areas of unmade ground which are decoratively planted and situated to the front of the buildings, away from main process areas.

2.7.2 External storage of materials can be split into two types, bulk materials are stored in fixed tanks in bunds, and, transient storage of materials are held in intermediate bulk containers (IBC) and drums. The tanks are designed, maintained and operated in line with the guidance in HSG176 “The storage of flammable liquids in tanks.”

2.7.3 Transfer and handling of the highly flammable materials is carried out in designated, self-bunded chemical stores.

2.7.4 Hazardous materials

2.7.5 Spillage Kits are located around the site and particularly in locations where materials which could cause damage to people or the environment are stored or transported. These kits comprise drums of absorbent materials e.g. sand and vermiculite where appropriate for the materials present. Site personnel are trained in the use of drain covers.

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2.7.6 In the event of a loss of containment surfacing outside of bunded areas, the spillage will typically flow down the gradient and be collected into the site surface water drainage system, which on the Northern site can be contained by isolation of the drains using a Pen Stock valve, and on the Southern site lead into a 60,000 litres interceptor.

2.8 Fire water run off

2.8.1 The majority of the site's drains and all of the surface drains in the external storage areas are routed to the local sewers via pumping stations or the action of a normally closed pen-stock valve. However, there are a number of surface water drains, in particular to the front of the site in car parking areas, where excess fire water could migrate to the River Lark, if not prevented. The site has a number of 'Telestopper bladders' available which can be used to block outlet drains on the site to prevent surface water drainage reaching the River Lark and foul water drains reaching the effluent plant.

2.8.2 Should the firewater run off the site onto the road, the water will migrate to the River Lark where potentially 2.5 million litres could make its way to the river. Treatt hold a number of booms and appropriately trained staff which they can deploy on the River Lark if required.

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 [3.4.15](#) 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
- Treatt Site Incident Controller
- 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.

3.2.3 The on-site Emergency Control Centre (ECC)

The decision on where the Emergency Control Centre is located will be made by the Site Main Controller taking into account the nature and location of the incident.

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).

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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.

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. If the fire alarm sound for more than 10 seconds 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 site uses an electronic badging system (Tensor) to record all personnel (including visitors) who are on site at any time with the exception of delivery drivers to Building 4's Yard. When the fire alarm is sounded, the relevant side of the site evacuates (North or South) to their designated muster points. Muster points are allocated by department at specified points at the front of the respective buildings on site and identified by relevant signage. [APPENDIX 6](#)

3.3.5 On the activation of a site evacuation a printout is taken from Tensor printer of each respective building with the exception of Building 6 (covered by reception sign out log) to determine if anyone is not accounted for.

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3.3.6 The respective building "Roll Caller" will ensure by cross referencing the Tensor personnel list that everyone is accounted for. If there are any discrepancies or unaccounted personnel, these are reported to the Site Incident Controller who will instigate a search if deemed safe to do so, pending their last reported position. If the emergency services are present, this information will be passed on to them. The "Fire Marshals" will conduct a post evacuation sweep to ensure that everybody has evacuated the buildings.

3.4 Method of alerting the Emergency Services – see Diagram at 3.4.16

3.4.1 The site fire alarms do not automatically call out the fire and rescue service, but alerts Red Care who monitor the alarms for the company. Between 0800 hrs and 1700 hrs Red Care will contact the site direct (Site Main Controller or Site Incident Controller) who will make the decision on whether to call the emergency services.

3.4.2. 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.

3.4.3 A Gerda Property Information Box is also sited externally to Building 1. This contains relevant site information in the case of an emergency situation, particularly outside standard operating hours, including fire service operational risk plans, fire zone plans, drainage plans, asbestos register, keys and codes for site access.

3.4.4 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.

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3.4.5 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.

3.4.6 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](#)

3.4.7 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.

3.4.8 The Forward Control Point (FCP), if not one of the pre designated 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.

3.4.9 There is no restriction of the use of Airwaves radios and mobile phones on site.

3.4.10 **The Pre Designated RVPs**

3.4.11 Suffolk Fire and Rescue Service will support an Off-site COMAH Emergency with the provision of two Command Vehicles 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. One Command Vehicle will be located at the multi-agency Forward Control Point. The other may be at the incident scene or removed to an appropriate location at the discretion of the Fire Incident Commander. It should be noted that the provision of the command vehicles will take some time.

3.4.12 **Traffic Control Points (TCP) See [APPENDIX 3](#)**

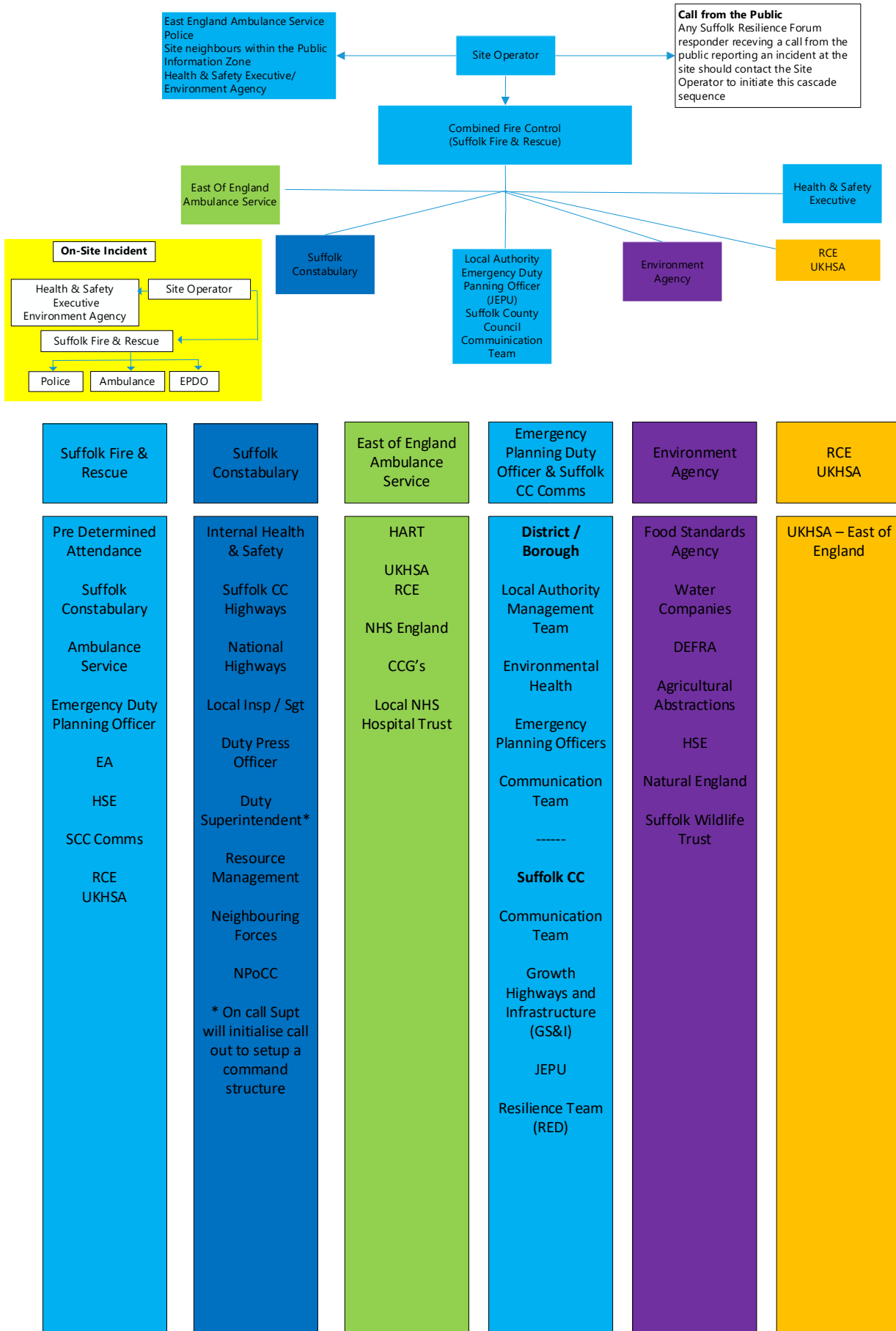
Note a new housing estate Marham Park is currently being develop on the western side of the site and a number of new roads have been established and are indicated in black on the map at [APPENDIX 3](#)

3.4.13 **Evacuation Assembly Points (EAP)**

3.4.14 Helicopter landing zones

None designated.

3.4.15 Overview of alerting and notification process.



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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 Tensor system printout (See 3.3.5 above).

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 (3.4.12 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, Fornham All Saint and Fornham St Genevieve/ St Martins Parish Councils.

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 Zone⁴. 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 / UKHSA 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
- UKHSA / 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.

⁴ 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 (Northern Way) Major Incident Plan and consult Operational Risk Information Fire Wallet.
- Despatch officer to Emergency Services RVP.

5.3 Suffolk Constabulary

- Activate Police Emergency Plan Treatt PLC (Northern Way)
- 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
- Notify UKHSA
- Deploy HART Team

5.5 Clinical Commissioning Group (CCG)

- 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 CCGs
- 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 Anglian 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 Coordinating Group (RCG) 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.

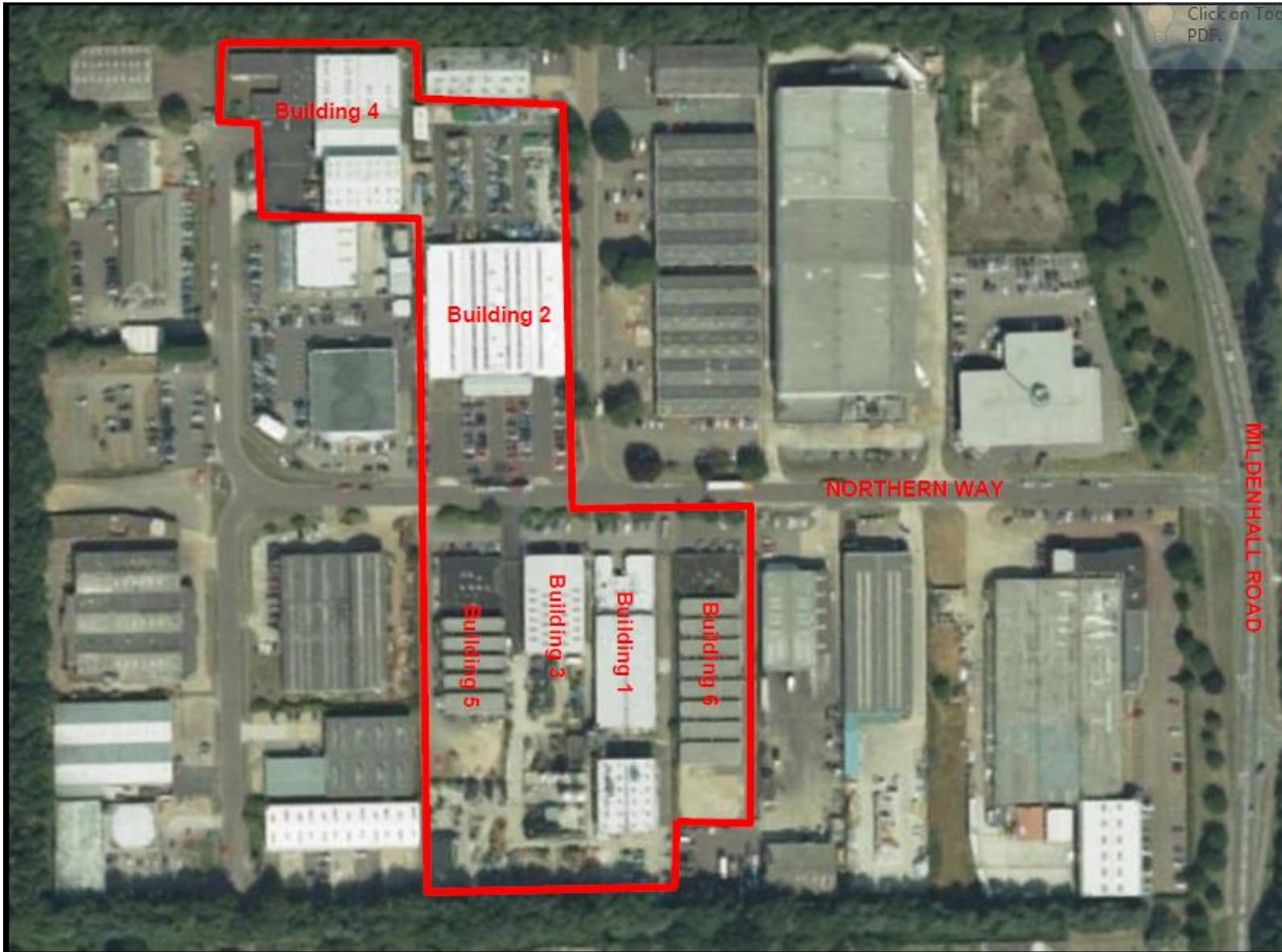
7.3 The arrangements, commensurate with the COMAH Regulations and Guidance, for exercise planning are detailed within the Suffolk Resilience Forum Protocol for Multi-Agency Exercise Planning for Suffolk.

Appendices:

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 building 1-6
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 1 – Treatt – HSE Public Information Zone

PIZ SHOWN IN RED



OFFICIAL

Appendix 2 – Treatt – Rendezvous Points

Appendix 3 - Traffic Control Points

Note: the new development (Marham Park) roads are indicated in black on the above map

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Appendix 4 – Treatt Site Plan

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Appendix 5 - Aerial Photograph of Site

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Appendix 6 - Muster Points

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Appendix 7 - Treatt MAH Locations

OFFICIAL

Appendix 8 - Treatt Drainage Plan Buildings 2 & 4

OFFICIAL

Appendix 8 - Treatt Drainage Plan Buildings 1,3 ,5 & 6

OFFICIAL

Appendix 9 – Treatt Listed Materials and Hazard Data

OFFICIAL

OFFICIAL

OFFICIAL

OFFICIAL

OFFICIAL

OFFICIAL

OFFICIAL

OFFICIAL

Appendix 10 – At Risk Populations and Areas

3.5.1 - Commercial sites:	Relation to site (N E W S)	In Public Information Zone	Day Shift	Night Shift
Treatt (Main Site)		Yes		
Apex Belting Northern Way Bury St Edmund 01284 752486	S	No		
Northgate VW Dealership Northern Way, Bury St Edmunds, Suffolk IP32 6NL 01284 763441	S	No		
Eastern Fork Lift Trucks Northern Way Bury St Edmunds IP32 6NL 01284 725599	SW	No		
Bury St Edmunds Mercedes Benz Northern Way Bury St Edmunds IP32 6NH 01284 769 676	N	No		
Travis Perkins PLC 35 Northern Way, Bury St Edmunds IP32 6NL 01284 703003	N	No		
Norish PLC Northern Way, Bury St. Edmunds IP32 6NL 01284 763464	NW	No		
Chassis Cabs Northern Way, Bury St. Edmunds, Suffolk, IP32 6NL 01284 768570	NE	No		
Quality Castings Northern Way, Bury St. Edmunds IP32 6NW 01284 755941	S	No		
Herga Electric Ltd Northern Way, Bury St. Edmunds IP32 6NN 01284 701422	S	No		
Speedy Hire Northern Way Bury St Edmunds, IP32 6NL 01284 764875	SW	No		
Bury Spectrum Gymnastics Club Unit 5, 1 Northern Way, Bury St. Edmunds IP32 6NH 01284 700866	NE	No		
Helmsman Lockers 1 Northern Way, Bury Saint Edmunds IP32 01284 727626	NE	No		
Moore & Stone Carpentry & Building Ltd Unit 3 Coppice End Northern Way Bury St Edmunds IP32 6NL 01284 725533	SE	No		
Vineyard Church 28 Northern Way, Bury St. Edmunds IP32 6NL 01284 765874	SE	No		
John A Weldon Partnership Unit 4 Coppice End Bury St Edmunds IP32 6NL 01284 723335	SE	No		
Mansfield 4x4 off road dealership Chase Rd, Bury St Edmunds, IP32 6NT 01284 767174	NW	No		

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3.5.1 - Commercial sites:	Relation to site (N E W S)	In Public Information Zone	Day Shift	Night Shift
Science Supplements Ltd 2 Chase Rd, Bury St Edmunds, IP32 6NT 0845 680 0606	NW	No		
Past Parts Ltd 4 Chase Rd, Bury St Edmunds, IP32 6NT 01284 750729	NW	No		
Engineering Concepts Unit 5A Chase Road Bury St Edmunds IP32 6NT 01284 700744	NW	No		
West House Transport (S&G) Ltd Chase Rd, Bury 01284 747245 St Edmunds, IP32 6NT 01284 747245	NW	No		
Premier Paper Group Ltd 4 Chase Road, Bury St Edmunds, IP32 6NT, 01284 701454	NW	No		
VW Vans 01284 544064	S	No		
Ginsters Unit 4b Chase Road Bury St Edmunds IP32 6NT	NW	No		
Kier Construction Rail Services Unit 3A Chase Road Bury St Edmunds IP32 6NT 07748 181238	NW	No		
D&G Mechanical Solutions Unit C Chase Road Bury St Edmunds IP32 6NL 01284 704024	NW	No		

3.5.2 Residential areas	Estimated Populations	Relation to site (N E W S)	In Public Information Zone	Distance from site
Marham Park	Not Known New Development	W	No	50m
Severn Road Bury St Edmunds	72	SE	No	50m
Mildenhall Road / Howard Estate Bury St Edmunds	3015	SE	No	Boarding rear of site
Fornham All Saint	711	NW	No	800m
Fornham St Genevieve	110	N	No	800m
Fornham St Martin	1300	NE	No	900m

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3.5.3 - Schools < 2.4km	Address	Relation to site (N E W S)	Distance from site (km)	Number of pupils (Approx)
St Benedicts Catholic School	Beetons Way Bury St Edmunds, Suffolk IP32 6RH 01284 753512	S	800m	610
Howard Community Academy	Beard Road Bury St Edmunds Suffolk IP32 6SA 01284 761405	SE	800m	150
Total Care Child-minding	31 Beard Road, Bury St Edmunds, Suffolk IP32 6SA 07717 256425	SE	800m	10
Bury St Edmunds County Upper School	Beetons Way Bury St Edmunds, Suffolk IP32 6RF 01284 754857	S	1Km	993
Tollgate County Primary School	Tollgate Lane Bury St Edmunds Suffolk IP32 6DG 01284 752742	S	1Km	324

3.5.4 Transient Populations	Postcode	Relation to site (N E W S)	Distance from site (km) (IMP / E plant)	Potential no's
All Saints Hotel 0843 178 7171	IP28 6JQ	N	200m	100+
Bury St Edmunds Golf Club 01284 755979	IP28 6LG	NW	700m	50

Environmentally Sensitive Locations < 1km of the site⁵	Nil - 250m from site	251 - 500m from site	501 - 1000m from site
1:250,000 Solid Geology			
Borehole Index	-	-	-
Areas of Outstanding Natural Beauty	-	-	-
National Parks	-	-	-
National Nature Reserves	-	-	-
Abstractions Licenses	-	-	18
River Quality Survey	--	--	--

Appendix 11 - Local infrastructure and Industrial Activity

Local infrastructure.

- Treatt is situated on the Northern Way Industrial Estate on the northern boundary of Bury St Edmunds. Access to the site is via the A1011 Mildenhall Road. The site itself is separated into two parts by the main access road to the Industrial site. There are a number of other industrial and car sales sites situated on the industrial site.
- A new housing estate Marham Park is currently being developed on land to the west 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.
- There are a number of small farms and holding sites situated 2 km North, South and West of the site. The agricultural land use is primarily as arable and livestock farming
- There is 1 Grade 1 and 43 Grade 2 listed buildings within 2 kms of the site.

Local environment

- The site sits above a chalk aquifer with high soil permeability.
- There are eight sites of Special Scientific Interest (SSSI) / Special Area of Conservation within 10kms of the site
- The nearest river course to the site is the river Lark which is 500m east of the site
- There are a total of 18 licensed groundwater abstraction points within 1 km of the site
- There are 8 sites defined as a Site of Special Scientific Interest (SSSI), within 10 km radius of the site. (See table below)

Name	Location	Relation to and distance from site
The Glen Chalk Caves	Bury St Edmunds Suffolk	3.1 kms
Horinger Court Caves	West Stow Suffolk	4.1 kms
Lackford Lakes	Lackford Suffolk	4.7 kms
Breckland Farm Land	Suffolk	5.5 kms
Black Ditches	Cavenham	7.2 kms
Breckland Forest	Suffolk	7.3 kms
Pakenham Meadows	Pakenham	9.4 kms
Hay Wood	Whepstead	9.75 kms

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
- 6am -9.45pm Monday - Friday
- **Other material stored on the site**

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 – Thingoe North Division.
Tower Division.
 - West Suffolk Council – St Olaves Ward.
 - Bury Town Council.

Appendix 13 – METHANE

METHANE

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

Anglian Water