

A66 Northern Trans-Pennine Project TR010062

2.7 Environmental Management Plan Annex D Emergency Procedures

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A66 ENVIRONMENTAL MANAGEMENT PLAN ANNEX D EMERGENCY PROCEDURES

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D Emergency Procedures

D.1 Introduction

D.1.1 This section details the actions to be taken in the event of an environmental incident or emergency. It also provides a mechanism for recording incidents so trends can be identified and action can be implemented to prevent recurrence.

D.2 Definitions

- D.2.1 Pollution the harmful impact on the local atmospheric, aquatic or land environment caused by the release of hazardous or nuisance-causing substances; excessive noise and vibration.
- D.2.2 Accidental Pollution where an accident results in sudden pollution.
- D.2.3 Environmental Incident any event, activity or condition that causes, could have caused, or has the potential to cause damage to people, damage to property or the environment.
- D.2.4 Consent Infringement where the limits (of potential pollution) set as conditions of consents, permits or licences are exceeded or where methods of operation are not in accordance with procedures or conditions set by the regulatory authority.
- D.2.5 Non-Compliance any event, activity or condition that does not comply with the Construction Environmental Management Plan

D.3 Environmental Incident Severity

Near miss

- D.3.1 A situation where no environmental consequences occur, but where:
 - A risk of environmental harm exists as a result of conditions on site or
 - A risk of environmental harm exists as a result of individuals actions or
 - There is site rule that is not being complied with.

Minor environmental incident

D.3.2 An incident:

- Causing minor or very localised environmental harm; or
- With minor environmental consequences that have no impact beyond the site boundary or
- In the case of offsite nuisance impacts such as noise, vibration, dust and lighting an incident with minor consequences beyond the site boundary that are recognised and rectified quickly
- An environmental regulation not being complied with

Intermediate environmental incident

D.3.3 An incident:



- Causing environmental harm beyond a small, localised area of the site or
- Causing minor environmental consequences beyond the site boundary or
- In the case of offsite nuisance impacts such as noise, vibration, dust and lighting an incident with moderate consequences beyond the site boundary that are recognised and rectified quickly.

Major environmental incident

D.3.4 An incident:

- Causing significant environmental consequences that cannot be immediately rectified or contained
- Causing material environmental harm beyond the site boundary.
- D.3.5 All reportable incidents will be reported by the Principal Contractor (PC) on National Highways HART system in line with the requirements of GG128 Requirements for reporting incidents, events and undesirable circumstances: health, safety, wellbeing, structural and environmental (GG128) (Highway England, 2020)¹. The National Highways Project Manager and Health and Safety manager must be contacted within one working day (or shift) of the occurrence.
- D.3.6 All reportable incidents will be subject to an investigation and an incident report must be made of the circumstance to identify measures to be taken to prevent recurrence. They will be raised by the PC at the weekly Safety, Health and Environment (SHE) contractors meetings.

D.4 Environmental Near Misses

- D.4.1 It is important to report all environmental near misses as the lessons we learn from these can prevent more serious incidents from occurring on site.
- D.4.2 On identification of a near miss, where a potentially hazardous situation is identified staff should:
 - Ensure that the area is made safe
 - Do not put yourself or others at risk
 - Inform your supervisor of the near miss
 - Complete the site health, safety and environmental observation card and submit it to the supervisor
 - All near misses will logged via National Highways HART system and will be monitored at both Project Progress Meetings and Project Environmental meetings e.g. what are the lessons to learn and what actions have been taken to prevent the incident happening again.
- D.4.3 It is important that those who have taken time to report a near miss are kept informed of the outcome. It is the Site Managers responsibility to ensure that this information is communicated to the employees. A

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¹ Highways England (2020) Design Manual for Road Building, GG128 Requirements for reporting incidents, events and undesirable circumstances: health, safety, wellbeing, structural and environmental



- summary of the near miss reports should be included in a monthly SHE briefing.
- D.4.4 Staff, operatives and sub-contractors must believe that they can report a near miss without fear of censure from site management or off-site management. The emphasis must be on preventing re-occurrence, not apportioning blame.
- D.4.5 Examples of incident severity are noted in Table 1: Examples of incident by severity.
- D.4.6 Method statements and associated documentation must be reviewed to ensure that they are suitable and sufficient. Any actions taken or revisions to Risk Assessments/Method Statements must be communicated to the workforce through toolbox talks and other media of consultation with employees.



Table 1: Examples of incident by severity

EIS	Spillage	Water	Waste	Dust	Noise	Ecology/Archaeology
Near Miss	Fuel containers left on ground outside bund, or mobile plant without a plant nappy	Material left in place where it could fall, blow or be washed into a watercourse or drain,	Waste left in workplace, skips not segregated on 1 or 2 occasions –easily rectified	Small amounts of dust are being produced, but not repeatedly	Noise levels raised during one off event	Nesting bird, noxious weeds or archaeological find discovered during works but no harm/damage/disturbance occurs.
Minor	Small spill dealt with on site immediately as amount is not significant and unlikely to cause harm to the immediate environment.	Incident where pollutant amounts entering a watercourse or drain are very small and can be controlled immediately and will not reoccur or cause harm to the surrounding environment.	Waste Storage area not kept tidy on repeated occasions. Waste mixed in skips regardless of signs on repeated occasions. Small amount of hazardous waste mixed into general skip. Can easily be removed. Waste Transfer Note/Consignment Note signed by untrained operative.	Small amounts of dust are being produced repeatedly, but intervention at site level prevents it from leaving site.	Emergency overrun of Section 61 Consent or Section 61 amendment / dispensation consented hours.	Minor damage occurs to protected trees roots or crowns, but does not destroy the tree. Noxious plants or injurious weeds are disturbed
Intermediate	Spill where help is required from the offices in the form of booms, pads, granules etc. Can be dealt with on site with a quick turn round time.	Abstraction of water without a licence or outside of an existing licences' conditions Discharge of water without consent or outside of existing consent conditions.	EWC codes/written descriptions not completed correctly on repeated occasions. Waste allowed to escape from inadequate skip storage.	Dust crossing site boundary. Dust from site causes members of the public to complain – but amounts do not cause damage to property/crops etc.	Noise levels lead to repeated complaints from local residents. Non-compliance with S61 conditions.	Site clearance commences without an ecological survey Noxious plants or injurious weeds are disposed of without correct procedures being followed. Earthwork or topsoil strip operations commence without a watching brief.



EIS	Spillage	Water	Waste	Dust	Noise	Ecology/Archaeology
			Hazardous waste mixed into general skips contaminates contents leading to waste requiring reclassification. Fly tipping on site.			Work commences on site without Archaeological assessment or consent.
Major	Large spill where watercourses, sewers, public highways, ground, air or habitats are endangered. Outside help required to contain spillage. May take hours/days to correct and may require the assistance of external authorities.	Major pollution incident to watercourses, sewers or groundwater that requires outside help to contain the spillage. Could be fuels, oils, chemicals, suspended solids in amounts that are detrimental to the surrounding environment.	Hazardous waste sent off site without a premises registration code. Waste sent off site without WTN/CN Waste sent to unlicensed premises. Unlicensed waste carrier used.	Large amounts of dust from site causes damage to property, farmers crops. Environmental Health Officer might issue hold on construction activities. Accidental fire causes smoke damage to neighbouring properties.	Noise levels lead to Environmental Health Officer putting a hold on construction activities. Serious noncompliance with S61 conditions or operating without S61 consent.	Habitat and protected species are destroyed, disturbed and / or killed. Disturbance of archaeological remains/ scheduled ancient monuments etc. leads to their damage or destruction.



D.5 Notification Procedures

Emergency Contacts

Table 2: Site emergency contacts

A66 Emergency Contact	PC Central Service Control - TBC
Fire, Police, Ambulance	999
Environment Agency	0800 807060
Specialist Environmental Clean-up contractor	TBC
Emergency 24 hour response.	
Project Directors	TBC
Section Senior Project Managers	TBC
DIPS Project Environment and Sustainability leads	TBC
Section Environmental Leads	TBC
Section Safety Managers	TBC
Works Managers and On Call Emergency Managers	TBC
Section Construction Managers	TBC
Traffic Management Managers	TBC
Traffic Safety Control Officers	TBC

Notification of environmental incidents

- D.5.1 Environmental incidents will in the first instance be notified to the Works Manager and Section Environmental Lead, the latter will report to National Highways Project Manager and Health and Safety Manager and report via the HART system. They will implement the escalation process noted in the Project Emergency Preparedness Plan.
- D.5.2 The PC Environment and Sustainability Lead will be notified and will contact external agencies as appropriate to the scale of the incident.
- D.5.3 All incidents will be logged on the National Highways HART system in accordance with GG128 by the Section Environmental Lead.
- D.5.4 All incidents will be reported at the weekly contractors SHE meeting, recorded in the monthly report and reported at monthly project meetings.

Arrangements for Statutory Notification

- D.5.5 The PC Environment and Sustainability leads will, following consultation with the Project Lead and National Highways, ensure that the appropriate regulatory authority is notified of environmental incidents where it is required by legislation and/or in accordance with GG128.
- D.5.6 The PC Environment and Sustainability leads will make suitable and adequate arrangements for notification of pollution incidents to the Environmental Agency both during and out of hours. These will include the nomination of an appropriate senior manager to be available 24 hours a day, 365 days a year responsible for contacting the Environment



- Agency. The arrangements will be communicated to security staff, emergency call out staff and duty managers.
- D.5.7 All communications with the regulatory authorities relating to environmental incidents will be copied to the relevant person within each parent company of the PC.
- D.5.8 Records of telephone conversations with regulatory authorities will be stored as per Control of Documents in accordance with the Environmental management system.

Notification of potential nuisance activities to residents

D.5.9 The Stakeholder Leads are responsible for the notification to residents that may be affected by potential disruptive activities (e.g. night-time working).

D.6 Incident control

Incident Response Action Sheets

D.6.1 Incident response action sheets are provided in Appendix A of this plan.

Pollution Control Equipment

- D.6.2 Spill kits will be located at strategic locations around the site including fuel storage areas, security cabins, watercourses and close to areas where plant is operating. Spill kit bins will be fitted with an anti-tamper seal. If this is broken then the stock of the kit needs to be checked, restocked as required and a new seal fitted.
- D.6.3 Typical contents will be as follows, but will vary depending on local circumstances:
 - Absorbent granules e.g. Eski "ABX10 Absorbent"
 - Absorbent mats e.g. Darcy Products "Drizit Oil Pad" Product Code 0140
 - Protective gloves
 - Heavy-duty plastic sacks
- D.6.4 The following may be included depending on the work in the area of the spill kit:
 - Absorbent booms
 - Drainage gully seals e.g. Darcy Products "Dammit X Mat" Product Code 4000/X.
- D.6.5 Relevant project personnel will be trained in the general use of spill kits during the site induction and through regular 'toolbox' talks.

Emergency call out services

D.6.6 The Environment Lead will ensure that emergency call-out services are established where appropriate e.g. vacuum tanker for removal of oily water from sumps/drains. Adler and Allen 24hr emergency Response is available for major spills that cannot be cleaned with spill kits on site: 0800592827 (TBC)



D.7 Incident reporting

Classification of environmental incidents

- D.7.1 "Minor" environmental incident is capable of being resolved by immediate action on a localised scale by those present at or near the incident.
- D.7.2 "Intermediate" environmental incident requires the mobilisation of resources from outside the work-site.
- D.7.3 "Major" environmental incident requires the assistance of external emergency services and/or regulatory authorities.

Investigating and reporting environmental incidents

- D.7.4 An incident investigation will be undertaken by the Environmental Team or someone else suitably qualified appointed by the PC Environment and Sustainability lead, as a result of an incident or emergency. This will involve gathering evidence as the first part of the investigation. It is crucial to gather evidence as soon as the incident has been brought under control. If this is not done straightaway it is easy to forget details.
- D.7.5 Evidence is important to ensure that sufficient information is available to enable a thorough investigation of what happened in order to prevent it happening again. The PC may also need to provide evidence to an enforcing authority of court if a prosecution takes place later.
- D.7.6 If an enforcing authority takes any photos, samples or does any monitoring, a representative from the PC should take photos, sample or monitor in the same way at the same time in the same place. This might include the Environment Agency taking water, waste or soil samples or the Local Authority Environmental Health Officer carrying out noise, vibration or dust monitoring.
- D.7.7 Important evidence that needs to be gathered and recorded includes:
 - What happened before, during and after the event
 - The consequences of the incident e.g. harm, damage, intervention by an enforcing authority, breach of a consent
 - Witness information and statement/s
 - Photographs of the incident and the area affected
 - Sketches showing what happened and where e.g. positions of people, plant and equipment, environmental receptors
 - Other relevant factors e.g. weather
- D.7.8 The purpose of the investigation is to identify exactly what happened and the circumstances leading up to the incident in order to prevent it happening again not only on the site where it occurred, but also on any other construction site.
- D.7.9 Any investigation must identify:
 - What happened before, during and after the incident this should include a precise, step-by-step timeline of the sequence of events, where they happened, who was present



- Details of instructions provided prior to and during the incident (verbal and written)
- Records of competence/training of all personnel present at the location of the incident
- Plant and equipment records, including maintenance records
- All points of failure in methods, plans, processes, procedures, training, communication etc.
- Immediate and root cause
- Actions to correct the incident and to prevent the incident from happening again
- D.7.10 On completion of the investigation, the final report together with any relevant supporting documentation, including the lessons learned report and mitigating actions report shall be recorded and attached to the HART event record. National Highways shall be kept informed of developments in relation to investigations and follow-up activities. The event entry on HART shall be kept up to date by the PC.
- D.7.11 The mitigating actions report for an incident, event or concern shall include:
 - an assessment of the effectiveness of the mitigating actions which have been implemented
 - a recommendation as to whether further risk reduction mitigation actions should be implemented
 - a recommended timetable for implementation of such further risk reduction mitigating actions, to ensure that risks to affected populations are reduced to a level that is as low as reasonably practical.
- D.7.12 Confirmation that actions required have been undertaken shall be reported to the National Highways Project Manager.



Appendix A - Environmental incident action sheets

- EIAS 01 Fuel, oil or chemical spill to watercourse or drainage system
- EIAS 02 Silty runoff to watercourse or drainage system
- EIAS 03 Fuel, oil or chemical spill to ground
- EIAS 04 Fuel, oil or chemical spill to highway
- EIAS 05 Unexpected discovery of contaminated land
- EIAS 06 Discovery of potential asbestos containing material
- EIAS 07 Unexpected discovery of protected species or habitat
- EIAS 08 Uncontrolled release of dust
- EIAS 09 Complaint due to construction noise
- EIAS 10 Enforcement action by LPA / EHO / EA / Police
- EIAS 11 Flooding of worksite
- EIAS 12 Unexpected archaeological discovery outside planned archaeological works
- EIAS 13 Fly tipping
- EIAS 14 Illegal disposal of Waste



EIAS 01	
Incident:	Fuel, oil or chemical spill to watercourse or drainage system
Action:	Stop work and contact supervisor immediately.
	Establish nature of substance spilled, considering personal safety
	before beginning any action to stop or clean up spillage. Use appropriate PPE e.g. gloves.
	Identify the source of spillage and stop flow immediately. Switch of sources of ignitions.
	Prevent spillage spreading by diverting the flow, creating a dam with earth or blocking drains.
	Locate the nearest spill kit and use absorbent booms, pads and granules as appropriate to soak up the spillage.
	Do not wash spillage into drains and do not use detergents, as this will make things worse.
	Call in emergency vacuum tanker / gully gulper if required to remove spillage.
	Collect all used spill kit materials and contaminated soil for disposal as hazardous waste.
	Record in environmental incident log.
	Replace any spill kits/granules used.
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability Director
	Corporate EHS Manager
	Environment Agency where spillage is likely to enter controlled water
	Sewerage undertaker where spillage is likely to enter sewers or
	drains
Severity Rating:	Major

EIAS 02	
Incident:	Silty runoff to watercourse or drainage system
Action:	Stop work and contact supervisor immediately.
	Identify cause of silty runoff and stop flow where possible and safe to
	do so e.g. dewatering of excavations.
	Block drains, create settlement ponds to enable settlement of solids,
	establish silt fence and / or place straw bales to filter runoff.
	Establish controlled discharge allowing for settlement of solids and
	filtration using straw bales or silt fencing as appropriate.
	Record in environmental incident log.
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability Director
	Corporate EHS Manager
	Environment Agency where a large volume of silty runoff has entered
	or is likely to enter controlled water
	Sewerage undertaker where a large volume of silty runoff has entered
	or is likely to enter sewers or drains
Severity Rating:	Intermediate, Major



EIAS 03	
Incident:	Fuel, oil or chemical spill to ground
Action:	Stop work and contact supervisor immediately. Establish nature of substance spilled, considering personal safety before beginning any action to stop or clean up spillage. Use appropriate PPE e.g. gloves. Identify the source of spillage and stop flow immediately. Switch of sources of ignitions. Prevent spillage spreading by diverting the flow, creating a dam with earth or blocking drains. Locate the nearest spill kit and use absorbent booms, pads and granules as appropriate to soak up the spillage. Do not wash spillage into drains and do not use detergents, as this will make things worse. Call in emergency vacuum tanker / gully gulper if required to remove spillage. Collect all used spill kit materials and contaminated soil for disposal as hazardous waste. Record in environmental incident log.
Notification:	Replace any spill kit used. Supervisor / Works Manager Site Manager National Highways, PM, H&S and via HART Environment and Sustainability Director Corporate EHS Manager Environment Agency where spillage is likely to enter controlled water or large spillage in groundwater protection zone Sewerage undertaker where spillage is likely to enter sewers or drains
Severity Rating:	Minor, Intermediate, Major

EIAS 04	
Incident:	Fuel, oil or chemical spill to highway
Action:	Stop work and contact supervisor immediately. Establish nature of substance spilled and risk of road traffic accident, considering personal safety before beginning any action to stop or clean up spillage. Use appropriate PPE and traffic management. Identify the source of spillage and stop flow immediately. Switch of sources of ignitions. Prevent spillage spreading by diverting the flow or blocking drains. Locate the nearest spill kit and use absorbent booms, pads and granules as appropriate to soak up the spillage. Do not wash spillage into drains and do not use detergents, as this will make things worse. Call in emergency vacuum tanker / gully gulper if required to remove spillage. Collect all used spill kit materials and contaminated soil for disposal as hazardous waste. Record in environmental incident log.
Notification:	Replace any spill kit used. Supervisor / Works Manager Site Manager National Highways, PM, H&S and via HART Environment and Sustainability Director Corporate EHS Manager Environment Agency where spillage is likely to enter controlled water or large spillage in groundwater protection zone Sewerage undertaker where spillage is likely to enter sewers or drains
Severity Rating:	Minor, Intermediate, Major



EIAS 05	
Incident:	Unexpected discovery of contaminated land
Action:	Stop work and contact supervisor immediately
	Establish nature of contaminated material and risk to personal safety
	before implementing control measures to prevent the escape of
	contamination. Control measures may involve backfilling or covering
	the excavation or the use of absorbent spill kit materials.
	Fence the affected area off and signpost to indicate "Contaminated
	Area – No Unauthorised Access".
	Record in environmental incident log.
	Agree requirements for continuing works in the area with the
	Construction Manager and the Environment and Sustainability
N. 115	Director.
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability lead
	Environment Agency and Local Authority Environmental Health
	Officer where significant risk of pollution from contaminated land
Severity Rating:	Minor, Intermediate, Major

EIAS 06	
Incident:	Discovery of potential asbestos containing material (ACM)
Action:	Stop work and contact supervisor immediately
	Establish nature of contaminated material and risk to personal safety
	before implementing control measures to prevent the escape of contamination.
	Fence the affected area off and signpost to indicate "Contaminated
	Area – No Unauthorised Access".
	Record in environmental incident log.
	Call in licensed asbestos contractor to sample potential ACM.
	Develop method statement for removal and disposal to licensed
	facility if confirmed to be asbestos.
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability lead
	Environment Agency and Local Authority Environmental Health
	Officer where significant risk of pollution from contaminated land
Severity Rating:	Minor, Intermediate, Major

EIAS 07	
Incident:	Unexpected discovery of protected species or habitat
Action:	Stop work and contact supervisor immediately
	Contact Ecologist to agree working methods and mitigation measures
	that may be required before recommencing work.
	Record in environmental incident log.
	Work may only restart with authorisation of Ecologist.
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability lead
	Ecologist
	English Nature if advised by Ecologist
Severity Rating:	Intermediate, Major depending on degree of disturbance



EIAS 08	
Incident:	Uncontrolled release of dust
Action:	Stop work and contact supervisor immediately.
	Damp down working area before recommencing work.
	Review working methods to ensure best practicable means is being used.
	Review weather forecasts to confirm whether additional control
	measures are required.
	Record in environmental incident log.
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability lead
	Community Relations Officer if dust released beyond site boundary
	Local Authority Environmental Health Officer if significant release of
	dust outside site boundary
Severity Rating:	Minor, Intermediate, Major

EIAS 09	
Incident:	Complaint due to construction noise
Action:	Stop work and contact supervisor immediately. Contact Community Relations Officer. Review working hours and Section 61 consent to confirm that work has been agreed with Local Authority Environmental Health Officer. Review working hours and methods and investigate potential for improvement. Record in environmental incident log.
Notification:	Supervisor / Works Manager Site Manager National Highways, PM, H&S and via HART Environment and Sustainability lead Community Relations Officer Local Authority Environmental Health Officer
Severity Rating:	Low, Intermediate

EIAS 10	
Incident:	Enforcement action by LPA / EHO / EA / Police
Action:	Stop work and contact supervisor immediately. Record in environmental incident log.
	Do not restart work until agreement has been reached with
	enforcing authority
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability lead
	Corporate EHS Manager
	Community Relations Officer
Severity Rating:	Major



EIAS 11	
Incident:	Flooding of worksite
Action:	Stop work and contact supervisor immediately.
	Consider personal safety before attempting to access flooding worksite.
	Remove potentially polluting materials from worksite e.g. fuel, oils, chemicals and cement.
	Remove floating materials from work area e.g. timber.
	Remove plant and equipment from work area.
	Use floating booms to contain and absorb any floating
	contaminants.
	Do not pump contaminated water out of area as flooding recedes, contain and use spill kit to absorb pollutants before pumping or
	removal by vacuum tanker. Record in environmental incident log.
Notification:	•
Notification.	Supervisor / Works Manager
	Site Manager National Highways, PM, H&S and via HART
	Environment and Sustainability lead
	Corporate EHS Manager
	Environment Agency if significant flooding or pollution of
	watercourse
Severity Rating:	Minor, Intermediate, Major

EIAS 12	
Incident:	Unexpected archaeological discovery outside planned archaeological works
Action:	Stop work and contact supervisor immediately. Notify Archaeologist. Agree mitigation requirements with Archaeologist, National Highways Archaeologist and County Archaeologist prior to restarting work. Record in environmental incident log.
Notification:	Supervisor / Works Manager Site Manager National Highways, PM, H&S and via HART Environment and Sustainability lead Archaeologist
Severity Rating:	Minor, Intermediate

EIAS 13	
Incident:	Fly tipping
Action:	Notify supervisor immediately. Contact Environment and Sustainability Director / Waste Manager to arrange disposal of fly tipped material. Ensure site is secured to prevent recurrence. Record in environmental incident log.
Notification:	Supervisor / Works Manager Site Manager National Highways, PM, H&S and via HART Environment and Sustainability lead Waste Manager
Severity Rating:	Intermediate



EIAS 14	
Incident:	Suspected illegal disposal of waste
Action:	Notify supervisor immediately.
	Notify Environment and Sustainability Director / Waste Manager so
	that full Duty of Care check / waste audit can be carried out on
	supplier / subcontractor.
	Record in environmental incident log.
Notification:	Supervisor / Works Manager
	Site Manager
	National Highways, PM, H&S and via HART
	Environment and Sustainability lead
	Waste Manager
Severity Rating:	Intermediate, Major