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Control of Major Accident Hazards (COMAH)

External Emergency Plan

PPG Industries (UK) Limited
Needham Road
Stowmarket
IP14 2AD

Author:	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 PPG Industries (UK) Limited, 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:

Bronze	Operational level of emergency services command and control (FCP)
CRCE	Centre for Chemical, Radiological and Environmental Hazards (PHE)
COMAH	Control of Major Accident Hazard Regulations
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
JESIP	Joint Emergency Services Interoperability Principles
Outer Cordon	The outer cordon controls movement of persons outside the inner cordon. The Police will maintain and control access to the outer cordon.
PHE	Public Health England
PIZ	Public Information Zone – area identified by HSE to describe the zone within which public information and warning of potential COMAH hazards is mandatory
RCG	Recovery Coordination 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.
SCC	Suffolk County Council
SCG	Strategic Coordinating Group
SRF	Suffolk Resilience Forum
SST	Site Safety Team (PPG)
STAC	Scientific & Technical Advisory Cell
StratCC	Strategic Coordination Centre
TCG	Tactical Coordinating Group
Traffic Control Point (TCP)	To manage the traffic flow in and around the site of a major incident

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Amendment Record

Amendment	Date	Amended by	Summary
1	17/01/17	KC/SH	1.4.1 replace Mark Burke with Andrea O'Connor 2.5.2 Remove Zinc Phosphate and Strontium Chromate. Appendix 10 Removal of Zinc Phosphate, Ally Methacrylate, Strontium Chromate Appendix 11 New Offsite letter Appendix 12 Update Off Site Action Card
2	5/9/19	SH	Para's 3.4.5, 3.4.7, 3.4.9 & 3.4.10 Addition of What Three Words locations Para 3.4.12 removal of on call superintend to VL Cadre
3	31/12/20	SH	Change of routine contact details at 1.4.1. from Andrea O'Conner to Andy Pugh Added Improvement after NHS England in distribution list. Addition of the fact that fire command vehicles may take some time to arrive (3.4.6) Removal of VL cadre and replace with Duty Superintendent in police responsibilities – para 3.4.12 Change from Recovery Working Group to Recovery Coordination Group – para 6.1 Bottom of para 3.4.2 amendment to the use of Airwaves radios
4	19/2/21	SH	Added Network Rail to the call cascade – para 3.4.12
5	14/10/21	SH	Change of name from XPO to GXO Logistics UK Limited

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Foreword

This document is the multi-agency External Emergency plan for PPG Industries (UK) Ltd, Stowmarket, 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.

Further reference has been drawn from the Health and Safety Executive (HSE) Guide to Control of Major Accident Hazards (COMAH) 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, Regulation 14 - Review and Testing of External Emergency Plans, Regulations 17 & 18 - Information provided to the public.

Distribution

The information below details the recipients of this plan

Addressee

Akzo Nobel

Anglian Water

British Transport Police

MHCLG Resilience and Emergencies Division

East of England Ambulance Service NHS Trust

Environment Agency

Food Standards Agency

Health and Safety Executive

Highways England

Ipswich & East Suffolk Clinical Commissioning Group

Mid Suffolk District Council

Muntons

Network Rail

NHS England Improvement

PPG Industries (UK) Ltd, Stowmarket

Public Health England

Suffolk Constabulary

Suffolk Fire and Rescue Service

Suffolk Joint Emergency Planning Unit (for Suffolk County Council)

Suffolk Libraries Stowmarket (sanitised)

GXO Logistics UK Limited (Domino Site)

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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
12/05/10	TARRAGON	TTX	Multi-agency off-site plan validation (COMAH regulation 11)
30/04/13	MINERVA	Live & TTX	Multi-agency off-site 3 yearly exercise
2/03/16	FLORIAN	Live	Multi-agency off-site 3 yearly exercise
6/2/19	FLORIAN 2019	Live /TCG	Multi-agency off-site 3 yearly exercise including TCG
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PPG INDUSTRIES (UK) Ltd EXTERNAL EMERGENCY PLAN

1. Introduction

1.1 General

1.1.1 PPG Industries (UK) Ltd, Stowmarket has been designated 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 to 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 PPG Industries (UK) Ltd, Stowmarket.

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 2015

1.2.2 The objectives of this plan are;

- *Containing and controlling incidents so as to minimise the consequences, 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 a major accident (as defined by the COMAH regulations see 1.1.3 above) which is wholly confined in its effect, within the perimeter fence of the establishment."

1.3.2 An '**Off-Site COMAH Emergency**' is a major accident (as defined by the COMAH regulation see 1.1.3 above) 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 PPG will automatically activate this plan unless otherwise advised

1.4 Site Contact Details

1.4.1 Routine Contact Details (Site Operator):

PPG Industries (UK) Limited, Needham Road, Stowmarket, IP14 2AD

Andrew Pugh Process Safety Manager & Process Safety Coordinator

Tel : **Redacted under FOI**

Email: **Redacted under FOI**

1.4.2 Emergency Contact Details

Duty Fire Officer (PPG)	24/7	01449 773465
Security (Main Gate Security lodge)	24/7	01449 773338
Main Switch Board / Fax	0800 hrs 1700 hrs	01449 613161 / 677118
Main Control Room 'PAPA (Main Office Room 18)	Incident only	01449 773227 / 773409
Alternate Control Room 1 (Main Gate Security lodge)	Incident only	01449 773338
Alternate Control Room 2 (Resin Plant training room)	Incident only	01449 773213

1.5. Site Information

1.5.1 PPG Industries (UK) Ltd, Stowmarket covers some 70 acres. PPG Industries (UK) Ltd, Stowmarket manufactures and stores significant volumes of paints and resins for the domestic and global automotive refinish coatings markets, as well as paints used in industry. The plant operates continuously 350 days a year (with stream shutdowns for maintenance and a complete plant shut down at Christmas).

1.5.2 Plant Shut Down Time

All processes, including the chemical processes on the resin plant, can be shut down with immediate effect. The main site Paint Plant can be rendered as shut down within 1 minute of the alarm being raised. Whilst the Resin Plant shut down can be initiated within a minute, it may take time to achieve a stable safe state.

1.5.3 Staff personnel

Maximum Numbers on Site Including Contractors (if any):

	0800 hrs - 1700 hrs	0600 hrs - 0800 hrs	1700 hrs - 2200 hrs	2200 hrs - 0800 hrs
PPG Staff	260	65	65	30
Contractors	70	10	10	10

1.5.4 Key Grid References

- Main Entrance (accessed from A1308) TM 058 576
What Three Words = inventors.launch.opened
- International Manufacture Paints - centre TM 058 579
What Three words = musical.kings.greyhound
- Finished Goods Warehouse - centre TM 057 578
What Three Words = shut.soon.fussy
- Resin Plant (E Site) - centre TM 060 573
What Three Word = hilltop.charging.worms
- Resin Plant Alternate Access Gate (from B1113) TM 061 571
What Three Words = observer.distorts.orchestra

Site plan - See maps and aerial photos as detailed at [**APPENDICES 1 - 7**](#)

1.5.5 Site Access and Egress

Site Vehicular Access Points – There are two access points for vehicles to the site:

- The main entrance off Needham Road, Stowmarket (A1308).
- Alternate access point situated on the B1113 road approx. 400m from the A1120 junction. (**For use in emergencies only**).

1.5.6 Public Rights of Way:

There is a public footpath which follows the River Gipping along its south side adjacent to the site

If this footpath is closed during an incident for safety reasons, then Suffolk County Council Highways should be informed as soon as possible

2 **Risk**

2.1 **Suffolk Community Risk Register**

2.1.1 The [Suffolk Community Risk Register](#) has assessed industrial activity for PPG Industries (UK) Ltd, Stowmarket for toxic and chemical release as MEDIUM RISK and fires and explosions as MEDIUM RISK.

2.1.2 As part of the COMAH Site Safety Report 2017 PPG Industries (UK) Ltd, Stowmarket has identified a representative set of 34 major accident scenarios, of which 24 relate to fire & explosion with some potential environmental impacts and 10 specific to environmental risks. 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 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.

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, including business premises, within the PIZ in accordance with Regulations 17 & 18 of COMAH Regulations. Detail of the information provided to the public within the PPG Industries (UK) PIZ is shown at [APPENDICES 11 & 12](#). These were last distributed in August 2017.

2.2 Domino Sites,

GXO Logistics UK Limited (Previously XPO) Distribution Warehouse, **Redacted under FOI** is a designated domino site and a lower tier COMAH establishment in its own right. It lies immediately to the south east and adjacent of the finished goods warehouse. There are also a number of industrial sites within the PIZ, although not designated as domino sites by the Competent Authority, may have an impact on an incident at PPG these are Akzo Nobel, Muntons and Bosch. Further information is held in the PPG safety report.

2.3 Wind direction.

2.3.1 The prevailing wind ranges from north westerly to south westerly. Average wind speeds range between 1 – 30 mph.

2.4 Primary risks to the public.

2.4.1 The PPG Industries (UK) Ltd, Stowmarket major accident scenarios consider the impacts of fire, fire and explosion, chemical fires and or explosion, toxic releases and potential liquid spills to the environment.

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. Additionally, both Resin Plant (E Site, building 500) and the Refinished Paints Warehouse (Building 376) have asbestos material in the roof cladding which during a fire or an explosion, may lead to additional hazardous particulates in any smoke plume. **APPENDIX 10** details the hazard impacts associated with these risks.

2.5 Primary Risk to the Environment

2.5.1 PPG Industries (UK) Ltd, Stowmarket 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 substances classified as dangerous to the environment (see [APPENDIX 10](#)) include **Redacted under FOI**

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 particulates, surface water run-off; drainage into surrounding land, and, contaminated equipment and or personnel.

2.6 On Site Resources and Mitigation

2.6.1 The site maintains 24/7 Duty Fire Officer Cover, supported by a fire crew (minimum of 4 personnel). Their primary tasking is to contain any on site incidents. If the Duty Fire Officer assesses that the PPG staff are unable to contain the incident, it is immediately passed to Combined Fire Control seeking assistance from Suffolk Fire and Rescue Service.

PPG Fire Crews are **not** available during the site shut down periods.

All staff are trained to identify and report any hazardous situation. Resin Plant (E site) staff are additionally trained to containing chemical spills within their respective areas of responsibility.

2.6.2 On Site Fire Fighting Resources;

- Water can be drawn initially from site boreholes and fire pumps (Main Site), 1 x 1.5 million litre storage tank and fire pumps (Resin Plant).
- The Resin Plant Reactor Building has manually controlled foam pouring systems on all floors.
- Main Site (Paint Manufacturing Plant) and Refinish Warehouse are additionally protected by foam enhanced sprinkler system.
- Tank deluge on the Main Site Tank Farm.

- Manually operated foam cannons.
- Other provisions such as portable Aqueous Film Forming (AFF) Foam.

2.6.3 On Site Medical Facilities:

The site is equipped with an occupational health department and shower facilities, with a minimum of one first aider on site 24/7. (This department does not have the facilities to deal with casualties from an incident)

2.7 On Site Containment – Spillages, Surface Water and Effluent

2.7.1 Site assessments consider loss of containment retainable within the site boundary. Hazardous liquids are stored in bulk tanks (primary containment), which are located in bunds (secondary containment), which provide protection in the event of leakage from any of the tanks (Bunding on site is set at 110% of the maximum holding for each tank). Kerbing (leading to interceptor drainage and holding tanks) across the site has been so designed to provide a third area (Tertiary) containment. The Paint Manufacturing Plant and surrounding areas bounded by the River Gipping and the railway line have a purpose made perimeter Fire Water Retention Wall but the Refinished Paints warehouse and Resin Plant (E-site) do not.

2.7.2 The tertiary containment area is also designed to collect fire water run-off, which would then be pumped to an interceptor for off-site disposal by road tanker.

2.7.3 Whilst fluvial flooding has historically affected on site road access to the Resin Plant (E Site) and the Main Site Drum Park, both fluvial and surface water runoff have been assessed as unlikely to initiate a major accident. They may however contribute to the consequences of major accident being less easy, or unable to be managed without environmental impact.

2.7.4 There is a site Emergency Response Team trained to intervene in the event of a spillage occurring. An Incident Controller will attend the scene.

2.7.5 Any hazardous product release into the watercourse will require abstraction to stop until such time as water can be assessed and or the river is cleaned.

2.7.6 On the main site, there are two sewage pits which also collect a limited amount of surface water (i.e. rainfall). Material accumulating here is sent to the municipal sewage system.

2.7.7 The main site also utilises a storm water drain system to collect rainfall. Water from this drain system flows to interceptor pits where it is tested by the Site Safety Team (SST) prior to release to the River Gipping.

2.7.8 On the Resin Plant (E-site), surface water is collected in a 3-chamber interceptor pit (number 101), from which it is pumped to the two main sewage collection pits on the main site.

2.7.9 In addition to effluent from the Resin Plant (E-site), the pits on the main site receive effluent from the Paint Manufacturing Plant, composed of surface water runoff and sewage.

2.7.10 Both the Paint Manufacturing and Resin Plant operate tanker unloading areas and have tertiary containment consisting of bunded sleeping policemen, each with the capacity to contain at least one tanker load. All transfer routines require drain covers to be in place before transfers commence. Any spillage material collected within these areas is collected and pumped, in the first instance, to road tankers (sub contracted arrangements are in place) or into temporary storage using Intermediate Bulk Containers (capacity 1000 litres), if road tanker(s) are unavailable, for subsequent off-site disposal. The Paint Manufacturing Plant has a fifth unloading area which drains to a closed interceptor or foul drain. All interceptors on site are fitted with a penstock valve and are normally kept closed. All materials collecting in foul drains flow into sewer pits.

2.7.11 Whilst the tertiary site containment is designed to prevent contaminated fire water flowing off-site or into the River Gipping, contamination of the river is possible should the interceptor tanks overflow. Similarly, the road between the Resin Plant and the Paint Manufacturing Plants may be unable to contain a spillage resulting from an overturned tanker in transit.

2.8 Water Course Containment

2.8.1 Watercourse surface barriers (booms), to retain lighter than water pollutants, are located:

- By the A1120 flyover and adjacent road access (TM 062 576), leading to the Resin Plant (E-site).
- 640 m further downstream on the Muntons site, where the site access from the B1113 crosses the River Gipping (TM 063 570). This boom is deployed following a call from the Main Security Office, or the PPG Duty Fire Officer, to Muntons, requesting staff to deploy their boom.
- Additional temporary booms are available with spill kits in several locations on the site, including adjacent to the bridge across the river at the entry to the main site.

2.8.2 The paint manufacturing tank farm area is approximately 1500 m upstream of the PPG boom.

2.8.3 The river flow between the Paint Manufacturing Plant to the PPG boom is approximately 4 minutes at average winter flow rates, and 40 minutes at average summer flow rates.

2.8.4 The river flow between the 2 booms (PPG / Muntons) is approximately 2 minutes at average winter flow rates, and 20 minutes at average summer flow rates.

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 an Off-Site COMAH Emergency has been declared this will automatically be a Major Incident for responding agencies.

The diagram at [3.4.12](#) below gives an overview of the alerting / notification process.

The following have the authority to declare an Off-Site COMAH Emergency and will activate this plan.

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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:

- PPG on site Duty Fire Officer.
- PPG Emergency 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 PPG Duty Fire Officer and supported by the PPG Emergency Team Main Coordinators (Red Hats).

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 PPG emergency capability to support the incident will be directed by the Emergency Services Incident Commander.

3.2.3 Redacted under FOI

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(These are used by PPG to coordinate their response to an incident).

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 (in the StratCC at Suffolk Constabulary HQ and usually chaired by the Police), Tactical Coordinating Group (located at Landmark House Ipswich usually chaired by the Police) and Incident Commander at the scene (Forward Control Point). PPG Liaison Officers will attend each of these functions to support the coordination process.

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 Groups can be found in the Suffolk Resilience Forum Generic Emergency Response Plan, Chapter 6 & Appendix C.

3.2.7 Communications between the responding Suffolk Resilience Forum partners will be by Airwave radio (Interoperability channels), 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.

3.3 PPG Plant Site Alarm Systems and Personnel Reactions

3.3.1 The site is constantly monitored for hazards by automatic sensors and alarms, and the Main Security Office using CCTV. The Duty Fire Officer carries out regular routine shift safety inspections.

3.3.2 Incident Alarm - All personnel on site have a responsibility to raise the alarm by using the manual break glass alarm system for any fire, chemical spill or injury or otherwise dialing extension 3333 to alert security. The emergency services will be directed to a pre identified appropriate rendezvous point (para [3.4.5](#) refers) by the site security staff.

3.4 Method of Alerting the Emergency Services – see Diagram at [3.4.12](#)

3.4.1 A break glass alarm automatically activates an internal communications network alerting all PPG emergency responders (Duty Fire Officer, retained fire and rescue crews, Emergency Team Main Coordinators, technical officers and first aiders).

3.4.2 The PPG Duty Fire Officer will assess if there are insufficient PPG Fire Crew to contain the incident on site or if there is a high risk of incident escalation. If the assessment is that the incident is or likely to escalate, the Duty Fire Officer will;

- Immediately call Combined Fire Control for support from Suffolk Fire and Rescue Service, via a 999 call, and will provide incident update details to Combined Fire Control, including any relevant fire-fighting technical and/or environmental information as known for the products involved in the incident (i.e. relevant Material Safety Data Sheets 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. This should be provided in the METHANE format see [APPENDIX 13](#)
- Indicate if known, whether this is an on-site incident or (or is likely to be) an Off-Site COMAH emergency.

- Consult the PPG Emergency Team Coordinators and will, in liaison with Suffolk Fire and Rescue Service, determine which of the predesignated RVPs should be used, see [3.4.5](#), based on estimated wind direction and safe approach.
- It is important that the RVP is located in a safe location taking into account the prevailing wind conditions (as indicated by the windsocks located by the Finished Paints Warehouse and Resin Plant (E-Site) or as advised by the PPG Main Control Centre) and nature of the incident.
- The Forward Control Point, if not one of the predesignated RVP locations (para [3.4.5](#) refers) must be in an area where non intrinsically safe communications may be used by all responding agencies, large enough to be accessible, safely, by multiple agency vehicles and 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 services are made aware of its location.

NOTE: 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

3.4.3 In the event that the Duty Fire Officer is unable to contact Combined Fire Control, directly, this information will be immediately passed to the Main Security Office to activate a 999 call requesting Fire and advising of the information at [3.4.2](#). Additional updates will also be passed by the Main Security Office if the Duty Fire Officer remains unable to contact Combined Fire Control directly.

3.4.4 The Main Security Office on receipt of an alarm panel indication, or as otherwise notified, will initiate a site shut down (including restrictions to access and egress to the site and coordinating subsequent roll call as appropriate). In the event of casualties being reported, the security officer will make a 999 call to request the Ambulance Service.

3.4.5 The Pre Designated Rendezvous Points (see APPENDIX 3) are;

Redacted under FOI

3.4.6 Suffolk Fire and Rescue Service will support an Off-Site COMAH Emergency with the provision of two Command Vehicles which will be located at the Forward Control Point to coordinate the emergency firefighting and the multi-agency operational response. It should be noted that the provision of the command vehicle may take sometime

3.4.7 Traffic Control Points (TCP) (See [APPENDIX 2](#))

Redacted under FOI

3.4.8 Evacuation of Non Essential Workforce – PPG Assembly Areas (See [APPENDIX 4](#))

PPG Industries (UK) Ltd, Stowmarket has identified five major Total Factory Evacuation Assembly Points (TFEAPs). These are inside the Public Information Zone but situated on the external boundaries of the site. In the event of a major incident contained on site, all personnel except the Emergency Response Team members will evacuate to the PPG TFEAPs for roll call purposes. In the event of a COMAH alarm the personnel will evacuate to the COMAH Evacuation Assembly Points (EAP), [3.4.10](#) refers.

3.4.9 PPG Total Factory Evacuation Area Assembly Points (TFEAP) (See [APPENDIX 4](#))

Redacted under FOI

3.4.10 PPG COMAH Evacuation Assembly Points (EAP) (See [APPENDIX 4](#))

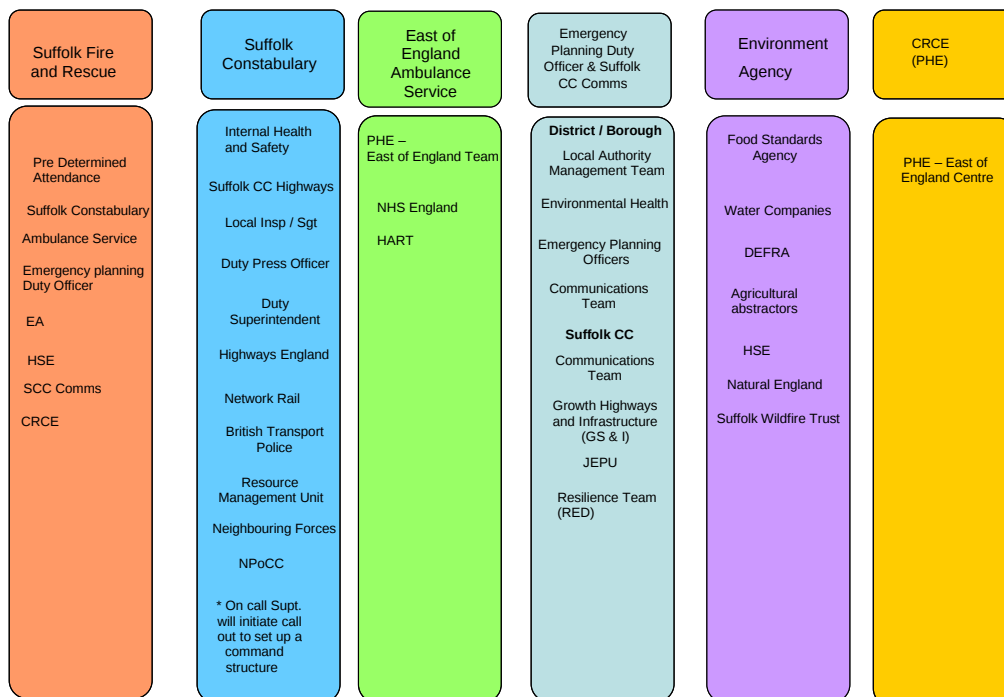
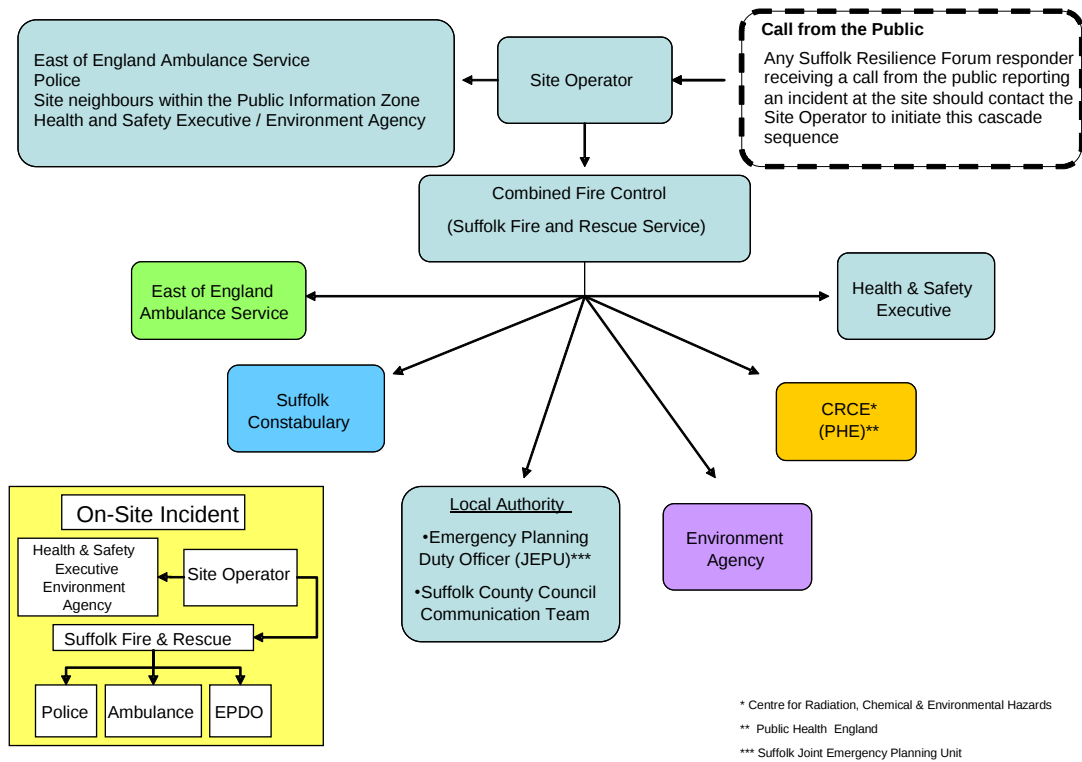
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Arrangements have been agreed with Climax Molybdenum for PPG staff to evacuate through their premises to the Tesco Car Park evacuation point, and with Akzo Nobel to evacuate through their premises to the Regal Cinema Car Park evacuation point.

3.4.11 Helicopter Landing Zones

None designated.

3.4.12 Overview of alerting and notification process.



This diagram details the alerting cascades of the 'core emergency responders and others involved in the response to an OFF SITE emergency at the site. The 'core' responders will act as the gateway into their respective organizations and to the many other organizations likely to be involved.

3.5 Method of Warning the Workforce

3.5.1 The site operates a four zoned area alarm system; Zone 1 - Administration and Training buildings, Zone 2 – Paint Manufacturing Plant and raw materials storage, Zone 3 - Resin Plant (E-Site), Zone 4 - Refinished Paints Warehouse. The alarms for these areas are a continuous ringing bell, and staff are trained on hearing that alarm to evacuate to their designated area Evacuation Assembly Points.

If these evacuation points are compromised by the incident hazards, staff will report to alternate evacuation assembly locations. All roll calls are coordinated by the Main Security Office to identify any known missing persons.

3.5.2 The Total Factory Evacuation Alarm (TFEA) overrides the building zone bell alarms but sounds on a 4 x 10 seconds (with a 5 second intervals) followed by a 20 seconds break before the cycle repeats. On hearing this alarm, all staff not immediately involved in the on-site emergency response evacuate to their designated Total Factory Evacuation Assembly Points (TFEAP - see [3.4.9](#)) at the perimeter of the site.

3.5.3 The Main Security Office, on activation of the TFEA, will advise the security offices for the commercial neighbours immediately adjacent to the site of the incident details, and confirm it is an on-site incident or likely to escalate to an Off-Site COMAH Emergency. The priority list for advising those neighbours will be dependent on the prevailing wind direction.

3.5.4 The Main Security Office will advise Roll Call Marshalls at any of the site Evacuation Assembly Points of any incident details pertinent to safeguarding or informing staff at those locations.

3.6 Off-Site Notification

3.6.1 The site operator is responsible for providing prior notification of any potential major accident hazard to those residents and premises within the Public Information Zone. ([APPENDICES 11 and 12](#) refer) – Off-Site Notification Letter and Off-Site Action Card) which set out the public reactions on hearing the COMAH Alarm Siren.

3.6.2 The COMAH Alarm is a 2 minute 'air raid siren tone'. 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](#)

3.6.4 The Main Security Office, on activation of the COMAH Alarm will advise the security offices for the commercial neighbours immediately adjacent to the site ([APPENDIX 8](#) Table 1 refers) of the incident details, and confirm it is an Off-Site COMAH Emergency. This will be done by the use of the Rapid Reach System which will be activated by the site controller.

The site operator will ensure that there are sufficient resources within the security office and if necessary, deploy additional resources to the security office to support its role.

3.6.5 The priority list for advising those neighbours will be dependent on the prevailing wind direction. All off-site neighbours are to be advised to extinguish any naked lights or other burning processes employed by their business or staff immediately and to 'Go in' - close all doors, windows and forced air ventilation, 'Stay in' - until further notice and 'Tune

in' - to local radio for further information as per the Off-Site Notification Letter and Off-Site Action

When an Off-Site COMAH Emergency has been declared the operator will update the Tactical Coordinating Group (once established) of those premises that have been notified of the incident.

3.6.6 Whilst traffic control points have been pre identified (para [3.4.7](#)) 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 Suffolk Constabulary in order to prevent and minimise public exposure to any consequential effects of an incident occurring on site.

3.6.7 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 as per the Off-Site Notification Letter.

3.6.8 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 that the latter advice is given within the first hour of the incident. If required rest centre locations will be identified by Mid Suffolk District Council. Any evacuation will be carried out in accordance with the SRF Shelter and Evacuation Guidance.

3.6.9 Escalation of the incident may require wider areas to be considered for evacuation based on the current wind direction.

3.6.10 Immediately post incident, all participating agencies will use the processes above to advise the public that the incident has been brought under control. (para [3.6.4](#) and [Section 4](#) below)

3.6.11 The Media response during and after an Off-Site COMAH Emergency is described in [Section 4](#) and [APPENDIX 14](#)

4. **Media Arrangements**

4.1 On notification of an Off-Site COMAH Emergency, Combined Fire Control will alert Suffolk County Council Communications that an incident is taking place. Suffolk County Council Communications will advise the locally elected members for the Suffolk County Council Divisions. Mid Suffolk District Council Communications will advise the locally elected members for Mid Suffolk District Council and will also update Stowmarket Town Council. A media Action Card is provided at **APPENDIX 14**

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

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.
- 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 via rapid reach.
- Provide liaison officer to Emergency Services FCP, plus Technical Liaison officer to the SCG and TCG (plus appropriate support staff) with access to appropriate Safety Data Sheets, details for raw materials, production batch and transported substances, to support emergency responders and other agencies requiring technical information.
- Call in appropriate management staff.
- Participate in a multi-agency media plan
- Notify the HSE and EA of incident.
- Advise off-site neighbouring premises, commercial properties residential properties etc. of situation overview. (Supply updated list to the TCG).
- Advise, as briefed by Fire / Police, the coordinated notification to the off-site 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.

- Request Akzo Nobel and Muntons to place warning notices on footpath as a precautionary measure for public safety until advised otherwise by the Police.

5.2 Fire & Rescue Service

- Activate the PPG Industries (UK) Ltd, Stowmarket Major Incident Plan and consult Operational Risk Information Fire Wallet.
- Review whether train services should be suspended and convey that to Network Rail.
- Dispatch officer to FCP.

5.3 Suffolk Constabulary

- Activate emergency plan Police Emergency Plan PPG Industries (UK) Ltd.
- Facilitate information sharing via an Airwave interoperable channel.
- Activate Airwaves Interoperability Channel
- Establish a command structure.
- Assist with the multi-agency response to traffic management in the event that there are road closures.
- Liaise with British Transport Police and Network Rail should the incident impact upon train services on the adjacent railway line.
- Participate in a multi-agency media plan.
- Facilitate the closure of footpaths until an emergency closure notice can be obtained from Suffolk County Council Resource Management (Highways).
- Dispatch an officer to the FCP.

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, Public Health England, Chemical Radiological and Environmental Hazards (CRCE) If Major Incident is declared notify neighbouring Ambulance Services
- Notify local Public Health England, East of England Centre

- Deploy HART Team

5.5 Ipswich & East Suffolk CCG

- Source appropriate NHS support to Local Authority emergency reception centres as required.

5.6 Public Health England

- 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 PHE 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 Director of Public Health and Clinical Commissioning Groups.
- 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

Mid Suffolk District Council:

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

Suffolk County Council

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

- Consider closures of foot path that runs adjacent to the site by the River Gipping.

5.10 Highways England

As per the SRF Generic Response Plan

5.11 Food Standards Agency

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

5.12 Health and Safety Executive

Investigate cause, emergency response and take appropriate action.

5.13 Network Rail

- Deploy a mobile operations manager to the multi-agency Forward Control Point to liaise directly with the emergency services.
- Provide a tactical technical officer to teleconference into TCG /SCG

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 Coordinating 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 PPG 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 Regulations and under other environmental legislation such as the Water Resources Act 1991 and the Wildlife and Countryside Act 1981.

Environmental Recovery issues

- Removal and cleansing of debris.
- Segregation, containment and cleansing of waste products.
- Segregation, containment and cleansing 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 External 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 upper and lower tier status of materials held or processed on site by PPG, 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 Exercise Management.

8. **Appendices:**

- 1 [PPG Industries \(UK\) - HSE Public Information Zone](#)
- 2 [Traffic Control Points](#)
- 3 [RVP](#)
- 4 [Total Factory Evacuation Area Assembly Points \(TFEAP\) & Comah
Evacuation Assembly Points \(EAP\)](#)
- 5 [PPG Industries \(UK\) – Aerial view](#)
- 6 [Underground Services – Main Site](#)
- 7 [Underground Services – E Site](#)
- 8 [Vulnerable Populations and Areas at Risk](#)
- 9 [Local Infrastructure and Industrial Activity](#)
- 10 [PPG Industries \(UK\) – Listed Materials and Hazard Data](#)
- 11 [Information to the Public in the PIZ: Content of off-site warning letter](#)
- 12 [Information to the Public in the PIZ: Off-site Action Card](#)
- 13 [METHANE](#)
- 14 [Media Action Card](#)



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Appendix 3

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Total Factory Evacuation Area Assembly Points (TFEAP) & COMAH Evacuation Assembly Points (EAP) Appendix 4

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Vulnerable Populations and Areas at Risk

Table.1 - Commercial sites:	Relation to site (N E W S)	In Public Information Zone	Day Shift	Night Shift
PPG Paint Manufacturing (Main Site)	NW of E plant	Yes		
PPG E Plant	SE of Paint Manufacturing	Yes		
AKzo Nobel	NW of Paint Manufacturing Plant/ E plant	Yes	40	20
Climax Molybdenum	E of PAINT MANUFACTURING PLANT N of E plant	Yes	47	10
GXO Logistics UK Limited (Previously XPO) (Decorative Paints distribution)	SSE of PAINT MANUFACTURING PLANT NW of E plant	Yes	157	58
Bidfood distribution	S of PAINT MANUFACTURING PLANT NW of E plant	Yes	77	14
Anglian Water Sewerage works	N of PAINT MANUFACTURING PLANT NNW of E plant	Yes		
Cedars Hotel	S of PAINT MANUFACTURING PLANT NW of E plant	Yes	See transient Populations	
James Newell	NNW of PAINT MANUFACTURING PLANT NNW of E Plant	Yes		
Muntons	SE of PAINT MANUFACTURING PLANT NE to SE of E Plant	Site bisected by PIZ	250	25
Bosch Atco	NW	Site bisected by PIZ	200	

Table 2 – Residential areas	Estimated Populations	Relation to site (N E W S)	In Public Information Zone	Distance from site (km)
Combs Ford		S to SW of PAINT MANUFACTURING PLANT SW to NW of E Plant	Partially	0.6 – 2.0
Cedars Park		N to NE	No	
Stowmarket Centre		W to NNW	Partially	0.5 – 3.0

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Table 3 - Schools < 2.4km	Address	Relation to site (N E W S)	Distance from site (km)	Number of pupils
Combs Ford Primary School	Glemsford Road, IP14 2PN		0.7	Not known
Stowmarket High School	House Road, IP14 1QR		1.6	1076
Abbots Hall Community Primary School	Danescourt Avenue, IP14 1QF		1.9	Not known
Chilton Community Primary School	Violet Hill Road, IP14 1NN		2.4	Not known

Table 4 - Transient Populations	Postcode	Relation to site (N E W S)	Distance PAINT MANUFACTURING PLANT / E plant (km)	Potential no's
Meadlands Recreational Club		W of PAINT MANUFACTURING PLANT NW of E Plant	0.4 / 0.7	100
Cedars Hotel	IP14 2AJ	S of PAINT MANUFACTURING PLANT NW of E plant	0.5 / 0.2	6 – 15 staff, 57 beds, 260 Bar, restaurant & conferencing
TOMO Industrial Estate		NNW of PAINT MANUFACTURING PLANT NNW of E Plant	0.6 / 1.0 1.3 / 1.7	x 50 industrial units
Combs Ford Surgery – Combs Lane	IP14 2SY	W of PAINT MANUFACTURING PLANT NWW of E Plant	0.8 / 1.2	
Violet Hill day Hospital	IP14 1NH	NW	1.8 / 2.2	
Hillcroft House Nursing Home Finborough Road	IP14 1PW	NW	2.0 / 2.4	
Combs Ford Veterinary Surgery Needham Road	IP14 2AW	W of PAINT MANUFACTURING PLANT NWW of E Plant	0.8 / 1.2	
Stowe Veterinary Group Bury Road	IP14 1JF	NNW	2.1 / 2.5	
Stowmarket Town Centre	NA	NW - NNW	0.8 / 2.0	
Stowmarket Rail Station Station Road East	IP14 IRQ	NNW	1.2 / 1.8	

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Table 4 - Transient Populations	Postcode	Relation to site (N E W S)	Distance PAINT MANUFACTURING PLANT / E plant (km)	Potential no's
Regal Cinema – Ipswich Street,	IP14 1AY	NW	1.4 / 1.8	
Museum of East Anglian Life	IP14 IDL	NW	1.5 / 1.8	
Mid Suffolk Leisure Centre Gainsborough Road	IP14 1LH	NW	2.5 / 2.8	
Tesco	IP14 5BE	NE of PAINT MANUFACTURING PLANT NNE of E Plant	0.6 / 1.0	
Ipswich & Norwich Co-op Solar Superstore- Combs Lane	IP14 2DA	W of PAINT MANUFACTURING PLANT NWW of E Plant	1.1 / 1.5	
ASDA Wilkes Way	IP14 IDE	NW	1.5 / 1.8	
Our Lady Catholic Church Stricklands Road	IP14 1AW	NW	1.2 / 1.6	
Gospell Hall Church Violet Hill Road	IP14 1NN	NWN	1.2 / 1.9	
St Peter and St Mary Parish Church Violet Hill Road	IP14 1NE	NNW	1.6 / 1.9	
Stowmarket Baptist Church Bury Street	IP14 IHF	NNW	1.6 / 1.9	
Stowmarket Methodist Church Regent Street	IP14 1RJ	NNW	1.6 / 2.0	
Salvation Army, Violet Hill Road	IP14 1NN	NWN	1.6 / 2.0	
Verandah House (B&B) Ipswich Road	IP14 1BD	NWN	0.8 / 1.2	

Table 5 - Environmentally Sensitive Locations < 1km of the site	Nil - 250m from site	251 - 500m from site	501 - 1000m from site
1:250,000 Solid Geology			
Borehole Index	2	13	2
Areas of Outstanding Natural Beauty	-	-	-
National Parks			
National Nature Reserves			
Abstractions Licenses	-	-	
River Quality Survey	2	1	3
RAMSAR Sites (Wetlands of international importance)	-	-	-
Sites of Special Scientific Interest (SSSI) Combs Wood (SW of site)	-	1	-
Special Areas of Conservation (SAC) - Combs Wood (SW of site)			
Special Protection Areas	-	-	-
Groundwater Vulnerability	-	-	-
Environmentally Sensitive Areas	-	-	-

Local infrastructure and Industrial Activity

- The town of Stowmarket (population 18,660) is situated North, West and South of the site. The River Gipping bisects the site area and flows northwest to southeast. The site is immediately bordered by residential housing and industrial premises.
- Two housing estates are within 1 km of the site; “Cedars Park”, is located to the northwest and northeast of the site and has approximately 5,800 residents. “Combs Ford” is situated to the south and southwest of the site; and has approximately 5,000 residents in that area.
- The site is approximately 1km south of Junction 50 on the A14, and lays either side (northwest and southeast) of the A1120, and north of the A1308 / B1113. Peak traffic flows occur between 0700 hrs - 0900 hrs (south – north) and 1600 hrs - 1830 hrs (north – south).
- The mainline East Anglian rail link from Ipswich (London) to Norwich and Ipswich to Peterborough runs southeast to northwest, immediately adjacent and parallel (to the northeast) to the site. The line carries significant volumes of both passenger and rail freight.
- Mains pressure gas pipelines, operated by National Grid (Gas), run across the site (Licensed Waste Disposal Area) passing approximately 150 m from the nearest Major Accident Hazard on site. Spur lines on site, supply gas to the Resin Plant (Laboratory, Boiler) and Main Site (canteen, training centre). The main isolation points are at the rear of the Main Security Gate and Resin Plant (E Site) R and D Laboratory and are isolated by PPG staff as part of their Emergency Working Instructions.
- 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 is an Anglian Water sewage works and water treatment plant, serving Stowmarket, situated immediately to the north of the main site.

- To the North and East of the sites there are a number of farms. The agricultural land use is primarily as arable farmland.
- There are 205 listed buildings within 2 kms of the site. All are Grade II, except for the Church of St Mary at Badley, and the Church of St Mary at Combs.

Local environment

- The site sits 35 m above sea level, on a flat area forming part of the local flood plain. This sits above a chalk aquifer with high soil permeability. There is a high underground water flow (northwest to southeast).
- Combs Wood is defined as a Site of Special Scientific Interest (SSSI) and lies 0.5 km - 1 km to the south-west of the site. It is also defined as a Special Area of Conservation. Within 2 kms of the site on the south-west side lies an area of woodland called 'Fir Covert.' This is accessible from Combs Wood by public footpath and is included within the SSSI.
- The River Gipping flows through (northwest to southeast) the site for approximately 1750 m before leaving the site. Downstream it passes through Needham Market, Claydon, Bramford and Sroughton before entering the River Orwell at Ipswich some 18 kms away.
- The river is 'fishable' both upstream and downstream of PPG. Pollutants entering the water system either as a consequence of a chemical spillage, plume contaminates, or firefighting activity can potentially have significant impact on the aquatic environment.
- The River Gipping is joined by the Rattlesden River (running west to east through Combs Ford) immediately on the northwester boundary to the site. Upstream both rivers are designated under the Environment Agency General Quality Assessment as Grade 1 (Good), and as Grade 2 (Moderate) just downstream of the Paint Manufacturing Plant and the Anglian Water Sewerage Outfall.
- Water from the River Gipping is extracted during the winter months at Sroughton for Alton Water Reservoir (main supply of drinking water for Ipswich). During winter months or when flow is highest average (5.35 m/s), this may take about 1 hour from Stowmarket to Sroughton, during

summer months lowest average flow rates 0.6m/s, the same distance takes about 9 hours and dilution of any pollutant is estimated at 53%.

- There are 48 water abstraction points within 1925 m of the site, 24 of these are used for public water supply/drinking water.

Industrial Activity

- The site is divided into three main areas; Resin plant (E Plant - East of the A1120), Paint Manufacturing Plant - which is often referred to as the Main Site) and the Finished Products Warehouse (holding up to 3 million litres of finished paint products) on the main site (West of the A1120 and North of the A1308). There are bulk storage tanks, tank farms and warehousing for raw materials on both plants.
- The Resin plant (E site) produces over 100 acrylic, polyester and alkyd resins. The resin plant is a chemical reaction process involving four pressure reactor streams in semi batch processing. Batch sizes range from 10 to 24 tonnes. Batch cycle times run from 10 hours to greater than 48 hours.

■ The Resin Plant (E site) also has, **Redacted under FOI**

- The Paint Manufacturing Plant produces over 18 million litres of paint per year, using over 1000 raw materials. Production includes further processing of some of the products from the resins plant. The process for the paint plant is cold blending of raw materials.
- The raw material, processing material and finished products held on site that qualify as COMAH Upper Tier substances; include Toxic, Flammable and Dangerous to the Environment substances (see [APPENDIX 10](#)). PPG Industries (UK) Ltd, Stowmarket stores raw materials for its production demands in bulk storage tanks, 1000li Intermediate Bulk Containers (IBCs), 205 litre drums, 500 kg and 25 kg bags. Finished goods are stored within the warehouse facility ranging from 250 mls containers up to 205 litre drums. Finished products are stored in UN approved packaging.
- The site operates water extraction from 2 boreholes under licence for its own operating processes, which include both industrial processes and domestic usage on site.

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PPG Industries Ltd
Needham Road, Stowmarket, Suffolk, England IP14 2AD
Telephone: +44 (0) 1449 613161 - Fax: +44 (0) 1449 677161

|

Dear Neighbour

Date: As Postmark

UK COMAH Regulations 2015

PPG Stowmarket manufactures paints and resins for the vehicle repair market. Under the COMAH Regulations 2015, PPG is classed as an upper tier COMAH establishment due to the quantity of hazardous materials that are stored on site. For further details please refer to the HSE website for COMAH 2015 Public Information Search which can be found at <https://notifications.hse.gov.uk/COMAH2015/Search.aspx>.

I would like to emphasise that we are writing to you as part of our 5 yearly COMAH report review and not due to any changes to our processes, chemical inventory or volumes. We are required to provide emergency information to you every five years.

PPG is proud of its safety record and its community relations and is committed to continue the long legacy of excellent safety performance that has characterized the site throughout the years.

PPG works closely with the competent authority (Health & Safety Executive & the Environment Agency) to reduce the risk of incidents occurring and with the Suffolk Joint Emergency Planning Unit to make improvements to the emergency plans and public communications. In the unlikely event of an incident occurring please refer to the attached document for advice on what action to take.

It should be pointed out that the risk of a major accident occurring is still low but the external Emergency Plan has been formed to prepare you for such an event – please refer to www.suffolkresilience.com/emergency-plans/ for more information. Hence, the attached Emergency Action Card and the information provided with this letter should be read and understood by all members of the household and kept in a prominent position so that it can be referred to in the unlikely event of a major incident occurring.

It is also recommended by Suffolk Constabulary that you subscribe to the Police Connect (www.suffolk.police.uk/services/police-connect); the subscribers are kept up to date with information from the Police Force in relation to COMAH. The Police will use the messaging service to keep people informed of any emergency actions as well as using the local radio.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Mike Walsh'.

Mike Walsh

Mike Walsh, Site Manager, PPG Industries, Stowmarket.

Actions for Residents on hearing the Major Incident Alarm at PPG Stowmarket Manufacturing Site

The Major Incident Alarm is a continuous siren lasting for two minutes; the siren repeats three times, at ten minute intervals, during the first thirty minutes of a Major Incident. If you hear this siren:

(Please note: a short 15 second siren test will sound mid-day on Fridays. Please ignore this test)



GO INDOORS....

- Go Indoors, bring domestic pets in with you.
- Close external doors and windows and turn off ventilation systems to keep out any potential fumes or smoke.
- Extinguish all naked flames.



STAY INDOORS AND STAY SAFE....

- If possible, stay in a downstairs room facing away from the PPG facility, draw the curtains and stay away from the windows.



TUNE IN FOR INFORMATION....

- Tune into the following Radio Station;
BBC Radio Suffolk FM 103.9 & 104.6 Mhz

- Further information can be found through:
 - Mid Suffolk web site: www.midsuffolk.gov.uk , follow the links for Emergency Planning & News
 - Or the Suffolk Resilience Forum web site: www.suffolkresilience.com , follow the links to COMAH
 - Or www.bbc.co.uk/news/England/suffolk

Fully co-operate with and follow instructions of the Emergency Services.
The all clear message will be given by the Police via Local Radio.
PPG Industries (UK) Ltd, Needham Road, Stowmarket, Suffolk. IP14 2AD

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	

MEDIA ACTION CARD

During an Off-Site COMAH Emergency Incident at PPG Industries (UK) Ltd, Stowmarket it is suggest 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 PPG Industries (UK) Ltd, Stowmarket, has been reported to the Emergency Services for Suffolk. As part of the response, the PPG COMAH 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

PPG Industries (UK) Ltd

Environment Agency

Suffolk Constabulary

British Transport Police

East of England Ambulance Service

Mid Suffolk District Council

NHS England East of England

West Suffolk Clinical Commissioning Group

Anglian Water

Network Rail

Rail Operator

Highways England