

Emissions and Discharges Strategy

1. Introduction

Emissions and Discharges generally refers to the liquid effluent, solid waste and airborne matter that is a by-product of a business's activity.

The University's Energy and Environmental Policy commits to *"Reduce the risk and minimise the impact from campus activities by controlling emissions, meeting regulatory standards and implementing emergency response procedures to prevent pollution"*.

Emissions and discharges include:

- Foul water effluents, sewage and grey water releases to the foul water system.
- Surface water discharges, rainwater run off from buildings and surfaces
- Emissions to air including gaseous and particulate releases from stacks, the CHP, fumes cupboards,
- Vehicle emissions – commuter vehicles, deliveries, public transport - particulate matter, NOX, SOX and other greenhouse gas emissions.
- Accidental releases (spills and leaks of hazardous substances e.g. oil, chemicals, gases)

Current control measures to reduce the impact of potentially polluting discharges and emissions include:

Table 1:

| Emissions/Discharges | Responsible Party | Current Control Measure |
|--|---|---|
| Sewage and grey water – trade water effluent | Thames Water Estates | Reduction of wastewater by managing consumption. Water Management Plan. Maintenance and servicing by Estates |
| Rainwater runoff from buildings and surfaces | Infrastructure managed by Estates | Regular maintenance and servicing of drainage infrastructure – interceptors and grease traps. |
| Stack emissions – from boilers, CHP, fume cupboards. | Estates and Schools | Design and specification Appropriate use of fume cupboards Compliance Testing and Servicing by Estates |
| Vehicle emissions – commuter vehicles, deliveries, public transport. | Vehicle owner responsibility. Procurement Vehicle manager | Reduce deliveries via contracts/agreements via procurement process Travel Plan/Policy Carbon reduction plan Fleet vehicle management |
| Refrigeration gases – accidental release | Estates and contractor | Compliance testing & servicing managed by Estates |
| Accidental releases (spills and leaks of hazardous substances e.g oil, chemicals, gases) | Estates and School and third parties | Spills Plans Spill Kits Inspections of fuel tanks, stores and interceptors. |

A list of incidents related to the accidental release of hazardous substances is stored in the EEMS

Setting a target for emissions and discharges from accidental or unforeseen releases of substances hazardous to the environment is harder to achieve. Efforts to reduce the risk of emissions and discharges needs to be preventative, but also there is work that can be done on making sure that when an incident occurs, we are well prepared and can respond to an incident effectively to reduce the severity of the incident.

Half of all incidents between 2017-2022 can be attributed to University activities (see Table 2 Appendix A). Other incidents can be attributed to contractors, suppliers and staff vehicles. Between 1 and 3 incidents per year have directly emanated from University activities.

2. Plan

- Aim:** To reduce the impact of emissions and discharges on the environment. The University aims to control and reduce emissions where possible by maintaining infrastructure to meet regulatory standards and to prevent pollution from incidents originating from university activities and those of its tenants by implementing plans to eliminate or reduce emissions.
- Objective:** The University will limit the number of incidents and non-conformities raised regarding emissions and discharges from university activities. The University will respond quickly and appropriately to reduce the impact of unforeseeable instances and work to ensure incidents are prevented in the first place.
- KPI:** Number of reported pollution incidents.
- Target:** No more than 3 incidents from University activities on a rolling 3 year average. The response to incidents will be prompt and efficient to reduce the impact on the environment which will in turn save on clean up costs.
- Actions:**
1. Ensure schools and functions have Spill Plans in place where appropriate by July 2023. See H&S CoP 55 on Spill Management.
 2. Issue Pollution Prevention Guidance document. Sustainability Services to action by December 2022.
 2. Undertake spill response training for Estates staff. Full training every 4-5 years with a refresh session at least every two years. Full training completed in May 2022, next full training session due May 2026.
 3. Continue to implement Zero Carbon Plan, Water Management Plan, Travel Plans and Waste Strategy as per the targets set out in the respective documents.
 4. Continue with the programme to inspect and maintain interceptors. Priority plan being rolled out by Building Maintenance over the next 5 years.
 5. Regular inspections of oil tanks via PPM with full inspection every 5 years. Last inspection undertaken in 2020.
 6. Continue to service and maintain boilers, refrigeration units, AC-units etc in line with statutory requirements. Effective checks to be completed via annual internal environmental audit.
 7. Ensure University vehicles have spill kits on board. Checked annually via Internal Environmental Audit.
 8. Contact those suppliers and contractors that transport or use hazardous substances to ensure they have the right procedures and spill kits in place. Sustainability to action by July 2023.
 9. Continue to audit and identify issues before they present an issue via annual internal environmental auditing programme.
 10. Sign up as a Clean Air Day (CAD) supporter and commit to actions that will mitigate our contribution to air pollution. CAD is the largest air quality campaign in the UK, run by Global Action Plan (GAP). <https://www.actionforcleanair.org.uk/campaigns/clean-air-day>
- Review:** Progress with this plan will be reported annually to the EMRG and more widely in the Annual Sustainability Report. It will be reviewed as part of the EEMS Management Review process and will be audited as part of the internal EEMS audit.

| VERSION | DATE ISSUED | BY | APPROVED BY | REPORTING | REVIEW FREQUENCY | NEXT REVIEW DATE |
|---------|-------------|-----------|-------------|------------------|------------------|------------------|
| V1.0 | July 2022 | Anna Glue | EMRG | | | July 2023 |
| V2.0 | July 2023 | Anna Glue | EMRG | Annually to EMRG | Every 3 years | July 2026 |