

AN INDEPENDENT REGISTRATION SCHEME FOR THE PESTICIDE INDUSTRY

**GUIDELINES ON THE DECONTAMINATION OF
PESTICIDE STORES PRIOR TO SALE,
CHANGE OF USE, OR RETURN OF THE LEASE.****INTRODUCTION**

These guidelines are only intended as general non-mandatory advice for companies who wish to cease storing pesticides at a particular site. In all but the simplest cases, it is strongly advised that the advice of a reputable specialist is sought. Each situation will vary according to the type of building, the period of use, the types of products stored etc. Therefore, one of the most important areas of consideration is a detailed site history, to allow an in depth evaluation of the site and to make the appropriate recommendations.

To avoid excessive decontamination costs, avoidance of contamination now and correct spillage containment procedures are **essential**. These are already covered in the Defra Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry – “**The Yellow Code**”.

These guidelines do not cover insurance of legal considerations pre-or post-decontamination nor do they cover the conditions for the sale or return of a lease. These would need to be determined between the relevant parties concerned.

It should be noted that for most well operated stores with competent staff there should be little problem and that thorough cleaning, possibly followed by sealing of the floor should be sufficient.

1. CONSIDERATION OF FUTURE USE

When planning a “clean-up” operation consideration should be given to the future use of the store/site e.g. If the store is to be demolished it may only be necessary to dispose of contaminated areas of the building safely, together with any adjacent contaminated topsoil.

2. SITE HISTORY

In order to ensure that the legally required site decontamination is effective it is necessary to know the site history. This should include:

- all known uses of the building(s), site
- storage of all potentially hazardous products either inside or outside e.g. empty containers which may have been stored in the past outside without being rinsed out; the storage of contaminated waste prior to disposal, past wash down or burial of waste material on site etc.
- the structure of the building and any modifications which may have been made e.g. change of floor from wood to concrete
- detailed records of all drainage arrangements including containment areas and surface water disposal

BASIS Registration Limited, St Monica's, 39 Windmill Lane, ASHBOURNE, Derbyshire DE6 1EY

Tel: 01335 343945 / 340850

Web site: <http://www.basis-reg.co.uk>

Registered in England No.: 1365343 Charity No.:1077006 VAT Reg No.:242/54997/56

BASIS is a registered trademark of BASIS Registration Limited. All rights reserved.

- detailed records should be kept of **all significant spillages**, including quantity and type of product spilt and medical action taken
- maintain a record of products stored
- consideration should also be given to other hazardous substances which may be present in the building e.g. asbestos

Some of this information may only be obtained from memory. However, it is recommended that the best available history is compiled **NOW** and continually updated to ensure that all the information is available should it be needed in the future.

3. HISTORY

In order to assess what actions may be necessary, the occupier should consider that areas which may be contaminated and consult the appropriate experts on assessment methods.

Under the Control of Substances Hazardous to Health Regulations 1999 (COSHH) and the Management of Health and Safety at Work Regulations 1992, an assessment is required of any risks to health and safety. All those responsible for the decontamination will need to make an assessment of any potential risks entailed in the work and the precautions required to protect workers, the environment, or the public.

The assessment should proceed in sensible phases, usually starting with a desk study and a site inspection to confirm the main details. It should take into account the level of contamination in and around the store and define the extent of the area to be decontaminated.

The ground around and below the building may have become contaminated due to spillage or disposal of waste materials. A carefully designed sampling and analysis programme will be necessary in many cases to assess the presence of such contamination.

Suggested organisations that should be consulted are:

- **Environmental Agency (EA)** in respect of a watercourse or groundwater contamination (or **Scottish Environmental Protection Agency (SEPA)** for Scotland, and the **Northern Ireland Environmental Agency (NIEA)**).
- **Health and Safety Executive** in respect of the health and safety aspects of the clean-up.
- **Water Companies** in respect of sewers and drains (or Regional Councils from Scotland)
- **Environmental Health Officer (EHO)** in respect of controls on safe storage and supply of pesticides.
- **Local Authorities** in respect of waste disposal (EHO may act as a link)
- **Waste Disposal Contractor** in respect of the eventual disposal of any contaminated waste

4. ANALYSIS TO DETERMINE CONTAMINATION

Samples for analysis may be necessary from potentially contaminated water, soils or building materials ect. The relevant authorities should indicate what is required. The costs would be borne by the store occupier.

5. ACTION TO BE TAKEN

Ensure that all Health and Safety procedures are observed during the decontamination process (including the COSHH Assessment) prior to any actions being taken.

- I. Pressure wash and/or steam clean the floor (and walls*) of store thoroughly, to allow for a proper inspection.
 - Ensure that all washings are disposed of by a reputable disposal contractor
 - Ensure that washings cannot contaminated drains, sewers or watercourses
 - Alternatively, to minimise the disposal of contaminated washings, powder residues may be vacuumed, followed by washing.
 - Walls may require washing, though this will depend on the preliminary assessment.
- II. Once the floor and walls are dry, inspect for stains, marks and depressions, which may indicate chemical contamination. Ensure that areas such as expansion joints are assessed.
- III. Remove any contaminated sections. Where good quality concrete is concerned it is generally accepted that the depth of contamination is in the order of 3-10 mm. It is therefore, recommended, that a minimum of 20 mm be removed. If the floor is cracked removal to a greater depth may be necessary.
- IV. Appoint a flooring/wall repair specialist to remove the contaminated areas and reinstate as appropriate. This appointment should be made after a site meeting to discuss, for example:
 - The implications of the contamination and the precautions to be taken (e.g. COSHH).
 - The tools to be used, and effect on the atmosphere, together with the effect on personnel.
 - Personal Protective Equipment e.g. goggles, face masks, gloves ect.
 - Ventilation.
 - Collection and disposal of all waste arising from the work. (All waste from the site should be treated as contaminated).
 - Vacuuming of the area to remove dust ect.
 - Materials to be used for reinstatement.
- V. Dispose of all contaminated material in accordance with the advice from the local Waste Regulations Authority, which would normally be by a licensed waste disposal contractor.

NOTE:

Decontamination of ground below the flooring must be considered if the flooring is new and products were stored on an earlier, and lower, floor that may have been more permeable.

Poor quality or absent floor joint seals may have led to contamination and core sampling may be necessary.

Consideration should be given to any need for decontamination required by past spillages in-store and outside including possible contamination of open ground outside the store building. Removal or encapsulation of contaminated ground may need to be considered.

6. SITE “APPROVAL”

Once the site has been cleaned the relevant authorities, especially the EHO and EA, SEPA, Natural Resources Wales or the NIEA should be invited to inspect the site and confirm that all the appropriate steps have been taken. This should be obtained in writing.

It may be necessary to carry out a supplementary sample analysis to confirm that decontamination is satisfactory. Records should be kept throughout and passed onto the new owner.

(It should be noted that Authorities are unlikely to give formal “Approval” but they may provide confirmation that their requirements have been carried out).

7. COST

The cost of clearing up contamination may be significant. You may wish to consider this with your insurers.

8. NOTIFICATION OF THE RELEVANT AUTHORITIES

Notify the local Fire Authority, Environmental Protection Agencies, the Police and any other relevant body, of the cessation of storage of pesticides, so that their records may be amended accordingly.

USEFUL REFERENCES

1. HSE “Protection of workers and the general public during development of contaminated land” ISBN 0 11 88 5657 X
2. HSE Guidance Note EH 52 “Removal techniques and associated waste handling for asbestos insulation, coatings and insulation board” ISBN 0 11 885409 7
3. Defra Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry PB3529 (1998) http://www.hse.gov.uk/pesticides/resources/Y/yellow_code.pdf
4. HSE publication – “Asbestos – Approved Code of Practice” L27 ISBN 0 11 82037 0
5. Waste Management, The Duty of Care; A Code of Practice; ISBN 00 11 753210 X
6. The Special Waste Regulations 1996 SI 1996 No. 972; ISBN 0 11 054565 6
7. The Special Waste (Amendment) Regulations 1996 SI 1996 No. 2019 ISBN 0 11 062894 2

Other publications and guidance should be available from: www.Gov.uk