

**WAT-G-061**

**EASR Guidance: Permit Activity: Oil storage for onward distribution**

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# Purpose

This document provides information and guidance for anyone carrying out the storage of oil for onward distribution which is authorised by a permit under The Environmental Authorisations (Scotland) Regulations.

This guidance does not cover any other permissions that may be required.

# What activity does this guidance apply to?

This guidance applies to the storage of oil for onward distribution which couldn’t comply with GBR 28 when the oil storage provisions were brought into the Water Environment (Controlled Activities) (Scotland) Regulations in 2017 (CAR). You may have applied for a licence where your site was not compliant with GBR 28. The licence should have required you to produce an Asset Improvement Plan. This plan should show how your site would either:

* Become compliant with GBR 28; or
* Otherwise prevent oil entering the water environment.

Your licence will become an EASR permit.

If you have not already provided an Asset Improvement Plan this guidance provides advice on the information you should include within it. It should be submitted to SEPA.

If your site becomes compliant with GBR 28 you can surrender your permit. If SEPA agrees other measures to reduce the risk of oil entering the water environment, other than GBR 28 compliance, they will vary your permit to require these measures.

We will not allow any further applications for a permit for the storage of oil for onward distribution because any sites not currently authorised by a permit should be compliant with GBR 28.

# Background to oil storage regulation

The provisions of the Oil Storage Regulations[[1]](#footnote-2) (OSR) were moved into an amendment of the Controlled Activities Regulations (CAR) in 2017[[2]](#footnote-3) as General Binding Rule 28 (GBR28). When the OSR moved to CAR, the specific exclusion of sites where there is an onward distribution of oil was not carried forward. Therefore, these sites were required to either comply with GBR28 or apply for a licence to store oil as a site for onward distribution. The GBR 28 checklist (section 4) was used by operators to help assess whether the site was complaint with GBR28.

At the time of transition from OSR to CAR, SEPA appreciated that many existing oil distribution depots had been in situ for many decades and had been out with the scope of the OSR. Therefore, some would require time for improvements to be retrofitted either to meet GBR28 compliance or an agreed ‘equivalent’ or employ alternative measures to reduce the risk of oil pollution.

Where a site was not immediately compliant with GBR 28 on the date the CAR amendment came into force (notwithstanding any grace period given by SEPA), the operator was required to apply for a licence from SEPA. Any application needed to be supported by an Oil Pollution Prevention Plan (OPPP) which justified how the operator would ensure that no oil enters the water environment from the site. It was the responsibility of the operator/site licence holder to keep the OPPP up to date to reflect operations within the site. The OPPP was to be made available for inspection by SEPA Officers at any reasonable time. Once satisfied with the OPPP and arrangements at the site SEPA issued a licence with a further requirement to produce an Asset Improvement Plan which would be agreed by SEPA with dates for upgrades to the site where necessary.

Water GBR 28 is now in the Environmental Authorisations (Scotland) Regulations 2018 (EASR). Now under EASR these licences are called permits.

Guidance on GBRs 26, 27 & 28 is available in WAT-G-060, EASR Guidance: GBRs 26,27,28: Oil storage.

# Water GBR 28 Checklist

## General requirements

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Is the tank of sufficient strength and structural integrity (unlikely to leak or burst in ordinary use)?  |  |  |
| Is the tank within a secondary containment system?  |  |  |
| Is the tank/containment system located or protected so an impact or collision cannot damage it?  |  |  |

## 4.2 Secondary containment: storage capacity

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| For a single tank, is the secondary containment at least 110% of the maximum storage capacity of the tank?  |  |  |
| For two or more tanks in one secondary containment system, is the secondary containment at least 110% of the biggest tank’s maximum storage capacity, or 25% of the total maximum storage capacity of all the tanks, whichever is the greatest?  |  |  |

## 4.3 Secondary containment: integrity

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Is the secondary containment impermeable to water and oil?  |  |  |
| Is the secondary containment system intact and without openings or valves for drainage?  |  |  |
| Are any fill pipes or draw off pipes that pass through the secondary containment sealed adequately?  |  |  |

## 4.4 Tank ancillary equipment

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Are all valves, filters, sight gauges, vent pipes or other ancillary equipment within the secondary containment system?  |  |  |
| If the tank has a sight gauge, is it properly supported and fitted with a valve that closes automatically when the gauge is not in use?  |  |  |
| Are vent pipes, taps and valves arranged so that any oil lost will be retained within the containment system? |  |  |
| Are all taps and valves, through which oil can be discharged to the open, fitted with locks and locked shut when not in use?  |  |  |

## 4.5 Deliveries to the tank

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Is the fill pipe situated within the secondary containment system or, if not, is a drip tray big enough to contain any oil that remains in the pipe work after filling available?  |  |  |
| Can the tank and vent be seen from the point where the filling operation is controlled or, if not, is the tank fitted with an automatic overfill prevention device?  |  |  |
| Are vent pipes, taps and valves arranged so that any oil lost will be retained within the containment system? |  |  |

## 4.6 Fill and draw off pipes

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Are fill, draw-off pipes (and overflow pipes) located or protected from impact or collision damage? |  |  |
| If made of materials liable to corrosion, are they protected from corrosion and frost damage? |  |  |
| Are they non permeable to hydrocarbon vapours? |  |  |
| And, if above ground, are they supported properly? |  |  |

## 4.7 Underground pipes (for filling and/or draw off)

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Are underground pipes for filling, draw off (or feed) protected from physical damage?  |  |  |
| Are all mechanical joints situated as a place accessible for inspection?  |  |  |
| Are there adequate facilities for detecting leaks?  |  |  |
| If permanent leak detection is provided, is it maintained in working order and tested at appropriate intervals? (at least every 5 years)? |  |  |
| If permanent leak detection is not provided, have the pipes been tested before use?  |  |  |
| Is pipework with mechanical joints tested for leaks every 5 years?  |  |  |
| Is all other pipework tested for leaks every 10 years?  |  |  |

## 4.8 Flexible draw off pipes permanently attached to the container or delivery pump (for draw off of oil from the tank)

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Is the flexible draw off pipe fitted with a tap, or valve at the delivery end that closes automatically when not in use?  |  |  |
| Is the pipe kept within the secondary containment system or positioned above an area which drains to a suitable oil interceptor when not in use? |  |  |

## 4.9 Security

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Is the pipe enclosed in a secure cabinet (equipped with a drip tray) which is locked shut when not in use? OR |  |  |
| Is there a lockable valve where the pipe leaves the container which is locked shut when not in use? OR |  |  |
| Has the premises in which the pipe is situated appropriate security to prevent unauthorised access? |  |  |

## 4.10 Pumped draw off (non-gravity draw off of oil from the tank)

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| Is the pump fitted with a non-return valve in the feed line to the pump?  |  |  |
| Is the pump protected from unauthorised use? |  |  |
| Is the pump located or protected to minimise risk of damage? |  |  |

## 4.11 Oil storage in drums

| **Requirements** | **YES** | **NO** |
| --- | --- | --- |
| If a drum is used for the storage of oil, is it situated in a containment system with a capacity of not less than 25% of the drum’s storage capacity? OR |  |  |
| If there are more than one drum in the same containment system, 25% of the aggregate capacity of the drums? |  |  |

# Asset Improvement Plan

## 5.1 What is an Asset Improvement Plan?

Producing an Asset Improvement Plan is a condition of a permit for the storage of oil for onward distribution where your site can’t comply with GBR 28. You should submit this to SEPA by the required date on the permit. The Asset Improvement Plan will then be assessed by SEPA and the permit will be varied to include the details of the plan as upgrade conditions.

Your Asset Improvement Plan should detail what needs to be done to upgrade the permitted site to ensure that a site is:

1. Working towards water GBR28 compliance.
2. Or an agreed ‘equivalent’.
3. Where this is not possible, putting in place alternative measures, applicable to the risk, as agreed with SEPA.

Every depot site will be unique with varying potential pathways and receptors for pollution. Some sites may have space constraints or topographical difficulties complying fully with the rules. In these circumstances, SEPA will be open to look at accepting alternative arrangements which achieve similar risk reduction as full compliance with the GBR28.

Once your Asset improvement Plan has been agreed with SEPA the permit will be varied to include the agreed timescales for the work, and/or agreed mitigation procedures to be applied. If your site becomes complaint with GBR28 then the permit can be surrendered.

## 5.2 What information to include in your Asset Improvement Plan

### 5.2.1 Can you comply with GBR 28?

You should consider if you can modify your site so that you can comply with GBR 28. If so, you should submit details of how you intend to do this with timescales in your Asset Improvement Plan. The [water GBR 28 checklist](#_Water_GBR_28) should help you identify what aspects will require improvements.

If agreed, SEPA will then vary your permit to reflect the plan.

### 5.2.2 Can you put in place “equivalent” measures?

If you can’t modify your site so that you can comply with GBR 28 then your Asset Improvement Plan should:

* Justify why meeting the requirements of the GBR28 will not be possible.
* Outline proposals for ‘equivalent’ measures to GBR 28 to protect the water environment.

### 5.2.3 Carry out a risk assessment to determine the appropriate measures

In exceptional circumstances you may not be able to put in place “equivalent” measures. In this case you will need to:

* Justify why meeting the requirements of the GBR28 will not be possible.
* Justify why ‘equivalent’ measures to GBR 28 to protect the water environment are not possible.
* Carry out a detailed risk assessment and determine the measures required to mitigate the risk.

You may also need to meet the requirements of COMAH legislation.

# Considering ‘equivalent’ measures

A common reason for non-compliance with GBR28 is inadequate secondary containment. GBR28 requires that the secondary containment system is at least 110% of the primary tank’s storage capacity or if in a shared bund then 110% of the largest tank’s storage capacity or 25% of the total capacity of all of the tanks, whichever is greatest. The secondary containment’s base and walls must also be impermeable to water and oil without any valves or openings for drainage.

The aim of the secondary containment system is to break the pathway to the receptor. If you can achieve this through alternative means of containment as outlined in [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)then these may be considered as ‘equivalent’ to GBR28.

[CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91) (Section 2.1) explains that ‘It is unlikely to be economic to provide the primary storage such that is it 100 per cent safe. No matter how much care is taken there is always a finite risk that, for example, a particular hazard has not been recognised, structural elements or materials do not behave as predicted or an error in the design or construction was made. Additional risks and uncertainties can be introduced throughout the service life of a primary containment system if it is poorly maintained, it is put to a different use not considered by the original design or is modified or extended in an inappropriate manner.’

Therefore, SEPA will not normally accept the sole reliance on primary containment.

If after consideration of improvements required to meet GBR28 compliance or an equivalent, it is then deemed primary containment alone is to be relied upon for the safe containment of oil, then extra attention must be given to the maintenance of the primary structure and ancillary equipment. These appropriate controls (alternative measures in section 8 of this document) can be a workable alternative to GBR28 compliance with full justification to SEPA, with a thorough environmental risk assessment, and under continued permitted control.

## 6.1 Examples of equivalent measures that can be considered

* Storage of less oil in tank(s), than it has capacity for, to meet secondary containment requirement. [HSG176](http://www.hse.gov.uk/pUbns/priced/hsg176.pdf) Paragraph 135 provides further information.
* Remote containment systems to fulfil containment requirement. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Section 3.4 provides further information.
* Combination of local and remote containment systems including repair of existing facilities. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Sections 3.5 and 12 provides further information.
* Earth banked containment. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Section 8 provides further information.
* Containment tanks. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Section 9 provides further information.
* Transfer systems. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Section 10 provides further information.

# How to carry out a risk assessment

You only need to carry out an assessment of the risks to the water environment from any release of oil if it is not possible to upgrade to meet the requirements of GBR28 or ‘equivalent’.

The risk assessment process is taken from [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91).

You need to identify and evaluate the source, pathway, receptor linkages for different credible incident scenarios.

## 7.1 Source

The source is oil. At a distribution depot the source will be the different types of oil stored on site. You should establish the nature and quantity of this potential source including:

* Physical properties (e.g. density and viscosity).
* Chemical and biochemical properties.
* Ecotoxicology properties.
* Bioaccumulation, biomagnification or persistence potential.

You should also consider the risks from any contaminated firewater.

### Source Rating

All fuel oils are HIGH because they are highly toxic to aquatic organisms.

Other oils such as fish oil are MODERATE

## 7.2 Pathway

Pathways are ways in which the source would reach a receptor. You should consider the proximity of all of the possible receptors. You then need to assess any credible pathways to these receptors. You need to identify these pathways. They can include:

* Overland flow following the topography of the land.
* Pipes, sewers, drains or other underground features that could lead to a receptor. Sewer, culverts and drains all have the potential to convey inventory rapidly away from a site and release them into the environment many kilometres from the site boundary. Even where the sewers, culverts and drains are sealed, the bedding and surround may act as a pathway for rapid off site migration.
* Permeable subsoils and strata underlying a site that could provide a pathway to groundwater or to a watercourse.

### 7.2.1 Site layout and drainage

To help identify the pathways you should consider the layout of the buildings, oil storage, roadways, hardstanding and other features, and the surface finish and permeability of the surface over which the oil may flow in the event of an escape.

In particular you should identify and assess if there:

* Is any hardstanding around the primary containment which slopes towards a surface receptor.
* Are primary containment installations surrounded by flat or slightly slopping permeable ground. This may allow oil to infiltrate into groundwater.
* Are surface water drains.
* Are on-site effluent drainage systems that provide pathways to trade effluent outfalls, to sewers, or to on or off site sewage treatment.
* Are below-ground features such as services, ducts, pipelines, filled ground, tunnels, tanks or sumps.
* Are other man-made pathways such as old mine workings, storm drains gullies, culverted watercourses and land drains.
* Are any soakaways for rainwater or other effluents that could act as a pathway to groundwater.

On large sites there may be a considerable variation in landform, soil type and geology across the site, which will influence runoff and infiltration. You should carry out geotechnical and hydrogeological surveys where the ground conditions are unknown. This is particularly important if the ground is to be used as part of a containment solution i.e. earth embankment bunds and lagoons.

You should consider the time it would take for the oil to reach the receptor. The quicker this occurs the less time there is to contain the oil and less time to warn others who may be affected i.e. sewage treatment plant operators. The time taken to reach a receptor can affect the mitigation which will be effective.

### Pathway Rating

Either HIGH, MODERATE or LOW. If a leak detection system is present and could prevent pollution reaching a receptor then this can be taken into account when rating the pathway hazard.

## 7.3 Receptor

A receptor includes humans, animals, fish, plants and biota, watercourses, groundwater and soils that would be affected (directly or indirectly) by the escape of the inventory.

A receptor could also be a downstream process such as a wastewater treatment works or a drinking water source.

You should identify receptors including:

* Nature conservation areas such as SSSIs, SPAs or SACs.
* Surface waters.
* Drinking water supplies.
* Bathing or shellfish waters.

### Receptor Rating

Nationally designated sites (SSSIs, SPAs, SACs) and drinking water sources are likely to be HIGH.

Locally designated sites, any surface water or groundwater bodies is likely to be MODERATE.

Non-designated land sites are likely to be LOW.

## 7.4 Overall Site Hazard Rating

You then need to combine the source, pathway and receptor ratings to obtain an overall site hazard rating of high, moderate or low.

Assessing the combined effects has to be a judgement based on knowledge, experience and the degree of confidence in the information available.

You will probably need to consider multiple source, pathway and receptor scenarios. For example, there may be one pathway to groundwater and another to surface water, each of which needs to be considered separately. Similarly, you might need to consider a number of receptors, since it may not be clear initially which of these is the most environmentally sensitive.

The overall site hazard rating you derive should represent the highest of the individual scenarios considered. Fuel oil storage will therefore always result in a high rating. However, the value of this exercise is to highlight where the risks are in the pathways and receptors so that proposed mitigation measures can be shown to be effective in cutting the risk.

This is different to the approach outlined in the [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)which we have found to be inconsistent because it details, in its text, that the highest rating should be applied but then suggests lower ratings in the associated table in the CIRIA guidance.

The overall site risk rating is then combined with the likelihood of the loss of containment to obtain the classification.

## 7.5 Site risk rating taking into account likelihood

Once you have worked out your overall hazard rating you should:

* Identify all of the events that are capable of causing loss of containment.
* Assessing the likelihood of occurrence of each event.

Potential failures and reasons for failure include:

* Operational failures, such as failure of plant or human failure by operators.
* Shortfalls in design like the lack of alarms and fail-safe devices.
* Structural failure such as failure of materials, components, corrosion.
* Abuse such as inappropriate change of use or other misuse.
* Impact e.g. from a vehicle.
* Vandalism, terrorism, force majeure etc.
* Flood, fire or explosion.
* Geological factors such as subsidence etc.
* Aging or deteriorating assets/subcomponents.

Further information on the techniques for assessing likelihood of events or failures can be found in section 2.5 of [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)[.](https://www.ciria.org/Resources/Free_publications/c736.aspx) Where company or plant specific failure data is not available, reference to the data provided in the COMAH Competent Authority guidance may be useful.

**Table 1: Site risk rating**

|  |  |
| --- | --- |
| **Possible combination of ratings (overall site hazard rating + likelihood)** | **Site risk rating**  |
| HH, HM, MH | High |
| MM, HL, LH | Moderate |
| LL, ML, LM | Low |

The combination of overall site hazard rating and likelihood of loss of containment provides a site risk rating:

* Low overall risk site risk: Class 1. Base level integrity.
* Moderate overall site risk: Class 2. Intermediate level of integrity.
* High overall site risk: Class 3. High level of integrity.

CIRIA C736 highlights ‘Combining ratings for hazard and frequency [likelihood] of loss of containment as described previously calls for skill, experience and judgement if sensible and useful conclusions are to be drawn.’ This is a judgement exercise and it is up to the permit holder to present a case for SEPA to assess.

# Proposing measures to mitigate the risk

Once you have worked out your risk rating you need to propose measures to mitigate the risk. Table 6.2 of CIRIA C736 sets out the key design recommendations for each class of containment.

Example measures to mitigate the risks include:

* Completion of a comprehensive base line survey then rectify identified issues. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Sections 5.4, 5.5, 5.6 and 5.7.
* Primary tank inspection protocol to [EEMUA 159](https://www.eemua.org/products/publications/print/eemua-publication-159), appropriate to grade of tank. [EEMUA 159](https://www.eemua.org/Products/Publications/Print/EEMUA-Publication-159.aspx) Section 5; and [HSG176,](http://www.hse.gov.uk/pUbns/priced/hsg176.pdf) Paragraphs 221-235.
* Regular maintenance and inspection regime. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Section 5.2; and [EEMUA 231](https://www.eemua.org/Products/Publications/Print/EEMUA-Publication-231.aspx) A guide to periodic examination and testing.
* Outlet drainage isolation systems. Various products available to detect oil in drainage systems, [PPG3](https://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/) information on interceptors.
* High Level Alarms (HLA) and High High Level Alarms (HHLA) within an agreed safety percentage tested regularly. [HSG176](http://www.hse.gov.uk/pUbns/priced/hsg176.pdf) Paragraphs 135-137 and [EEMUA 191](https://www.eemua.org/Products/Publications/Print/EEMUA-Publication-191.aspx).
* Hose pressure testing. [GS4](http://www.hse.gov.uk/pubns/gs4.pdf) and [EEMUA 159](https://www.eemua.org/Products/Publications/Print/EEMUA-Publication-159.aspx) Section 15.
* Stock management systems.
* Assessment of life expectancy of components. [EEMUA 159](https://www.eemua.org/Products/Publications/Print/EEMUA-Publication-159.aspx) Section 17.
* Identification of sacrificial areas for temporary containment. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Section 11.
* Drainage pipe and channel system integrity. [CIRIA C736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS&WebsiteKey=3f18c87a-d62b-4eca-8ef4-9b09309c1c91)Section 5.5.4.

# Disclaimer

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SEPA reserves the right to depart from this guidance and take appropriate action as it considers necessary or appropriate. Operators are responsible for ensuring that they are compliant with the law. If necessary, independent legal / specialist advice should be sought.

1. Water Environment (Oil Storage) (Scotland) Regulations 2006 [↑](#footnote-ref-2)
2. [Water Environment (Miscellaneous) (Scotland) Regulations 2017](http://search.netregs.org.uk/search?w=Water%20Environment%20(Miscellaneous)%20(Scotland)%20Regulations%202017)  [↑](#footnote-ref-3)