Spill Response Procedure

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1. INTRODUCTION

Exact Contracting recognises its commitment under the Exact Contracting Environmental Policy and its obligation to minimise impact on the environment and employees health due to exposure to hazardous materials in the workplace.

The following procedure has been documented through task observation, experience and using industry best practices. The procedure consists of instructions to be abided by when completing this task. These guidelines are either in point form or numbered lists, with the level of detail varying dependent on the individual task.

It is important to note:

If the task you are about to carry out is not detailed within this procedure or if you are unsure or do not fully comprehend the correct procedure, contact your Supervisor or HSET Coordinator.

Remember **safety first.** No job is so important that your safety or the safety of your fellow workers should be put in jeopardy. If this task places you in danger due to the chemicals you are dealing with, contact your Supervisor or HSET Coordinator.

2. PURPOSE

The purpose of this procedure is to outline the appropriate management of chemical and hydrocarbon spills to minimise the potential impact on the environment and the safety of those utilising chemicals. The containment of spills, removal and disposal of all contaminated material, including contaminated soil, is required for the area to be properly remediated.

3. OVERVIEW

This procedure describes the following spill response requirements:

- Training.
- Spill response equipment (spill kits).
- Initial notification and risk assessment.
- Spill management.
- Reporting, spill registration and investigation.
- Site-specific client reporting.

4. RELEVANT LEGISLATION

- *Work Health and Safety Act 2012* (SA).
- *Work Health and Safety Regulations 2012* (SA).
- *Work Health and Safety Act 2011* (NT).
- *Work Health and Safety Regulations 2011* (NT).
- *Work Health and Safety Act 2011* (NSW).
- *Work Health and Safety Regulations 2017* (NSW).
- *Work Health and Safety Act 2020* (WA).

- *Work Health and Safety (General) Regulations 2022* (WA).
- *Work Health and Safety (Mines) Regulations 2022* (WA).
- *Mines Safety and Inspection Act 1994* (WA).
- *Mines Safety and Inspection Levy Regulations 2010* (WA).
- *Occupational Health and Safety Act 2004* (VIC).
- *Occupational Health and Safety Regulations 2017* (VIC).
- *Mining Management Act 2001* (NT).
- *Mining Management Regulations 2001* (NT).
- *Work Health and Safety (Mines and Petroleum Sites) Act 2013* (NSW).
- *Work Health and Safety (Mines and Petroleum Sites) Regulations 2014* (NSW).
- *Environmental Protection Act 1993* (SA).
- *Environmental Protection Regulations 2009* (SA).
- *Environment Protection Act 2019* (NT).
- *Environment Protection Regulations 2020* (NT).
- *Waste Management and Pollution Control Act 1998* (NT).
- *Waste Management and Pollution Control (Administration) Regulations 1998* (NT).
- *Environmental Planning and Assessment Act 1979* (NSW).
- *Environmental Planning and Assessment Regulation 2021* (NSW).
- *Environmental Protection Act 1986* (WA).
- *Environmental Protection Regulations 1987* (WA).
- *Environment Protection Act 2017* (Vic).
- *Environment Protection Regulations 2021* (Vic).

5. REFERENCE DOCUMENTS

- SafeWork Australia – Guide for Major Hazard Facilities.
- National Codes of Practice – Managing Risks of Hazardous Chemicals in the Workplace.
- AS 1940-2004: The storage and handling of flammable and combustible liquids.
- AS 3780-2008: The storage and handling of corrosive substances.
- WHSPRO-007 Hazardous Chemicals Procedure.
- WHSFRM-089 Spill Kit Inspection Tool.

6. PERSONAL PROTECTIVE EQUIPMENT

Hand protection -leather gloves.

Eye protection – safety glasses.

Foot protection – safety boots with steel/carbon toe cap.

Body protection - protective clothing.

Eye Protection – full face shield.

Respiratory protection – face mask.

7. RESPONSIBLE PEOPLE

7.1. PERSON(S) REPORTING SPILL EVENT

7.1.1. Initial notification and risk assessment.

7.1.2. Immediate action.

7.2. SITE SUPERVISOR

7.2.1. Internal notification.

7.2.2. Secondary risk assessment.

7.3. SITE HSE&T COORDINATOR(S)

7.3.1. Coordinate spill response and management.

7.3.2. Purchase and maintain spill response equipment.

7.3.3. Secondary risk assessment of significant incidents, where necessary.

7.3.4. Provide advice on spill response and management.

7.3.5. Report spill on company intranet (HSEQ Software, Lucidity or equivalent).

7.3.6. Incident investigation.

7.3.7. Communicate incident outcomes and learnings.

7.4. PROJECT MANAGER(S)

7.4.1. Report incidents to client and/or regulators where required.

7.5. ENVIRONMENTAL MANAGER

7.5.1. Governance and compliance of this procedure.

7.5.2. Reporting to regulators.

7.6. NATIONAL SAFETY, TRAINING & QUALITY MANAGER

7.6.1. Governance and compliance of this procedure.

7.6.2. Reporting to regulators.

8. EQUIPMENT AND TOOLING REQUIRED

- PPE (pursuant to section 6)
- Spill kit(s)
- Approved waste removal containers / bins

9. PROCEDURE

Hazard	Description	Controls
Chemical	▪ Exposure to hazardous chemicals. ▪ Exposure to reactive chemicals and noxious fumes. ▪ Inhalation of fumes and toxic gases. ▪ Contamination of surrounding environment.	▪ Identification labels on chemical containers. ▪ SDS registers with associated chemical risk assessments. ▪ Segregation of chemicals pursuant to AS3833. ▪ PPE suitable for handling chemicals including respiratory PPE. ▪ Spill kits suited to product type. ▪ Bunded areas / catch trays.
Gravitational	▪ Slipping from substances spilled. ▪ Undulated / unstable ground conditions.	▪ Eyes on path. ▪ Ensure boots / footwear in good condition. ▪ Clean up spill prior to walking on substance. ▪ Maintain 3 points of contact.
Thermal	▪ Reaction of chemicals causing fire. ▪ Material contact with hot surface.	▪ Fire suppression on machinery. ▪ Fire extinguishers placed in area. ▪ Trained and competent persons to spill response. ▪ Isolation of ignition sources.
Vehicle Interaction	▪ Interaction with vehicles and personnel on road.	▪ Utilise spotters as required. ▪ Maintain positive communications at all times. ▪ Isolate machinery event areas. ▪ Exclusion zones.

9.1. TRAINING

9.1.1. The National Safety, Training & Quality Manager will ensure basic environmental awareness training, which includes a spill response component is delivered and documented accordingly.

9.1.2. Additional training may include staff involved in:

A. Plant operation and maintenance of equipment;

B. Stores;

C. Transport and distribution of chemicals and hydrocarbons on site;

D. Emergency services;
E. Environmental management; and
F. Site management and administration.

9.2. SPILL RESPONSE EQUIPMENT

9.2.1. The HSET coordinator shall maintain appropriate and adequately sized spill response equipment at each facility using and storing chemicals and hydrocarbons based on an assessment of the Safety Data Sheet (SDS) including:

A. Corrosive material spill kits.
B. Hydrocarbon/non-corrosive spill kits.

9.2.2. Spill response equipment shall include spill response kits and any other material in sufficient quantities, specified in the SDS.

9.2.3. Each spill kit shall comprise a 240 litre wheelie bin with lid cover containing the following (or equivalent in absorbent materials):

A. Sorbent pads (50).
B. Booms 100 cm diameter (any combination to achieve 9 metres minimum total length).
C. Pillow 58 cm x 37 cm (1).
D. Kitty litter (2 x 10 kg bag).
E. Solvent and oil resistant gloves (1 pair).
F. Clear safety glasses (1 pair).
G. Disposable coveralls (1 pair of XL).
H. Dust pan and broom (1).
I. Disposable half mask respirator (1).
J. Contaminated waste bags (3).
K. Spill kit response flow chart (1).

9.2.4. Spill kits shall be placed in a visible location within 20 metres of hydrocarbon or corrosive storage/use areas.

9.2.5. Each site shall maintain a large roll of tear-off absorbent pads for cleaning minor spills and leaks to prevent depletion of spill kit stocks.

9.2.6. The HSET coordinator will inspect spill response equipment for tamper tag presence on a monthly basis to ensure appropriate and adequate supplies are maintained as per HSE Team Accountabilities (WHSFRM-091) and the Spill Kit Inspection Tool (WHSFRM-089).

9.3. INITIAL NOTIFICATION AND RISK ASSESSMENT

9.3.1. The reporting person shall:

A. Stop all work in the immediate area once the spill has been identified.
B. Assess the risk associated with the spill before responding:
- Identify the spill material;
- Determine the quantity and source of the spill;
- Review the relevant guide and/or SDS via Chemwatch and obtain the appropriate PPE;
- Ensure the area is safe to enter and remain up wind from the spilt material; and

- Remove any ignition risks.

C. Report all spills to the supervisor as soon as reasonably practicable, but at least within the shift in which the spill occurred. Where the incident is considered potentially significant, the incident shall be reported to the supervisor immediately.

9.3.2. The Supervisor shall:

A. Where the spill constitutes an emergency, notify the 'Emergency Response Team' (where applicable) and comply with the site-specific emergency response plan.

B. Notify the project manager and HSET coordinator of the spill as soon as practicable. Where the spill is considered significant, seek advice on spill containment, clean up, material disposal and controlled waste tracking method.

9.4. SPILL MANAGEMENT

9.4.1. The reporting person shall control the spill (immediate actions) using appropriate PPE, isolate the source of the spill (e.g., shut off valves, plug any visible holes).

9.4.2. The supervisor or HSET coordinator shall (secondary actions):

A. Conduct a secondary risk assessment based on the information provided by the reporting person.

B. Implement further control measures where necessary to isolate and contain the spill:

- Prevent the spill from reaching any ground or surface water systems and the drainage network; and
- Surround the spill with suitable material (e.g. earthen bund, absorbent boom) to contain the spill from spreading.

C. Clean-up the spill.

- All chemical and hydrocarbon spills must be cleaned up as soon as practicable.
- Where the spill has occurred in a bunded area:
  - Contain the spill in the bund and have the spilt material pumped out by an appropriately licensed controlled waste contractor and/or use a suitable spill kit or readily available non-combustible material (e.g. soil, sand) to absorb or recover the spilt material.
  - Serviced by an oily water separator and the spill is not contained (spilt material has been processed through the oily water separator), arrange for the oily water separator to be emptied where necessary. Use a suitable spill kit or readily available non-combustible material (e.g. soil, sand) to absorb or recover any remaining spilt material in the bund.
  - Not serviced by an oily water separator and water is present in the bund (resulting in oily water), arrange for the bund to be pumped out by a controlled waste contractor and disposed of appropriately. Where water is not present in the bund, pump the spilt material into a waste oil container for disposal and/or use appropriate spill kit or readily available non-combustible material (e.g. soil, sand) to absorb or recover the spilt material.
- Use the appropriate spill kit, where available, to absorb or recover the spilt material.
  - Clean up corrosive material using the corrosives spill kit.
  - Clean up non-corrosive material using the hydrocarbon/non-corrosive spill kit.

- Where a spill kit is not required or unavailable or the spill is too large to be effectively managed with the available spill response equipment, absorb, and recover the spill using readily available non-combustible material (e.g., soil, sand, crusher dust). Remove all contaminated soil for appropriate disposal.
- Where the spill has occurred in a workshop, use appropriate cleaning products to remove any oily residue that remains after the spill has been cleaned up.

D. Use of booms to contain or divert spills:

- Place downhill from spill on sloping ground.
- Surround leaking drums and containers to prevent spill from spreading.
- Protect drains by placing booms in front or around drain.
- Divert spill away from drains etc. to an area where the spill can be cleaned up.

E. Using pads to absorb or clean up spills:

- Place pads behind booms to absorb any seepage under booms.
- Place pads under leaking pipes or valves.
- Use pads to wipe down clothing, floors, containers etc. contaminated by spill.

F. Using kitty litter to absorb spills:

- Use correct kitty litter for spill. Plant-based products using material such as crushed coconut fibre must not be used for corrosive spills due to thermal risks from combustion.
- Spread onto and in front of spill.
- Push into spill with broom or shovel.
- Use to absorb and solidify larger volumes of spilt liquid.

G. Use of contaminated waste bags:

- For use during clean up stage.
- Place all contaminated absorbents into bag and tie off.
- Only fill bags half way.
- Ensure waste tracking procedure and card is completed correctly.

H. Dispose of contaminated material.

- Dispose of contaminated soils to the sites bioremediation area in accordance with license conditions where applicable. Where bioremediation facilities are not available, contact the sites environment department for advice on appropriate disposal methods.
- Dispose of contaminated absorbent material into designated bins to be removed offsite by an appropriately licensed controlled waste contractor.
- Arrange for oily wastewater to be removed offsite by an appropriately licensed controlled waste contractor. Alternatively, contact the Environmental Department to discuss other disposal options.

9.5. REPORTING AND INVESTIGATION

9.5.1. Spills under 2L are not required to be reported - but should be cleaned up and disposed of appropriately.

9.5.2. Spills over 2L, but under 20L, should be reported via a “Spill Report Card” available via the Lucidity InForm Module.

9.5.3. All hydrocarbon (i.e. fuel or oil) spills over 20L across any site must be reported on Exact Contracting HSEQ Software - Lucidity as an incident within 24 hours of the spill occurring.

9.5.4. Saline water spills over 1000L, or any water spill that enters a natural waterway must be reported on Exact Contracting HSEQ Software - Lucidity as an incident within 24 hours of the spill occurring.

9.5.5. The reporting person shall report the spill to the HSET coordinator within 24 hours of the incident occurring.

9.5.6. The HSET coordinator shall complete the data fields in Exact Contracting company intranet (HSEQ Software, Lucidity or equivalent) incident page.

9.5.7. The HSET coordinator shall investigate the spill, regardless of outcome or risk level, according to the investigation requirements outlined in the 'Accident and Incident Investigation Reporting Procedure' (WHSPRO-005).

9.5.8. Supervisors and Project Managers shall communicate the outcomes and learning of the incident to work crews and relevant stakeholders. This will support an adaptive management approach and future prevention.

9.5.9. Where the incident is considered a reportable incident, the project manager shall submit correspondence to the client and/or relevant regulators within the requirements of the specified legislative or licensing condition.

10. SITE SPECIFIC REPORTING REQUIREMENTS

10.1.1. For each site and client, procedures for varying spill sizes may differ. All Exact Contracting employees shall be properly inducted and advised of the reporting requirements and procedures prior to commencing work.

10.1.2. **If client spill reporting protocols are more stringent than Exact Contracting's internal reporting requirements, the spills shall be reported as per client protocols in lieu of Exact Contracting internal reporting.**

11. EMERGENCY CONTACTS

STATE	COMPANY	APPLICATION	DEPARTMENT	ACCESSIBILITY	NAME	PHONE NUMBER
ALL EMERGENCY SITUATIONS CALL '000'						
National	Exact	Spills on projects	Environmental	24 Hours	Dylan Edwards	0408 856 055
National	Exact	Spills on projects	Safety	24 Hours	Nathan Widger	0400 286 106
National	Poisons	Spills that have had immediate human health implications	Hotline	24 Hours	NA	13 11 26
WA	West Australian Government - DWER	Spills during transport activities	Pollution Watch	24 Hours	NA	1300 784 782
WA	West Australian Government - DWER	Spills during transport activities	Controlled Waste	Business Hours	NA	(08) 6364 6946
SA	South Australian Government - EPA	Spills during transport activities	Emergency Response Team (ERT)	24 Hours	NA	(08) 8204 2004
SA	South Australian Government - EPA	Spills during transport activities	General Enquiries	Business Hours	NA	(08) 8204 2004
NT	Northern Territory Government – EPA	Spills during transport activities	Pollution Hotline	24 Hours	NA	1800 064 567
NT	Northern Territory Government – EPA	Spills during transport activities	General Enquiries	Business Hours	NA	(08) 8924 4218

12. SPILL RESPONSE FLOWCHART