Spill Response Standard

Approval

	Position	Name	Date
Originator:	Environment and Sustainability Specialist	Katie Lawrence	25/05/2023
Reviewed & approved by:	Environment and Sustainability Team Leader	Ed Parker	01/06/2023
Endorsed by:	Head of Health, Safety and Environment	Ed Chetcuti	02/06/2023
Next Review:			June 2028

Feedback

Contact the Environment & Sustainability Team if you have feedback in relation to this procedure: environment@tasnetworks.com.au

Contents

Spill Response Standard

1. Purpose

This Standard outlines the requirements for responding to spills and leaks from TasNetworks assets and equipment, and other substances that TasNetworks personnel and contractors handle.

The Standard aims to:

- Minimise TasNetworks' impact on the environment and minimise health risks associated with spills and leaks
- Assist TasNetworks' personnel and contractors to effectively respond to spills and leaks and clearly define the hand over points for response and reporting.
- Ensure that the risk and residual impact to our employees, other persons, the community and the environment is minimised during clean-up, transportation, storage, and disposal of controlled wastes.

2. Scope

This Standard applies to everyone working for, or on behalf of TasNetworks with requirements relating to spills and or leaks of the following parameters:

- Insulating oil;
- Fuel and hydraulic oil;
- Asbestos;
- CCA Ash;
- Mercury; and
- Lead;

The following situations are outside the scope of this Standard:

- Larger spill responses involving multidisciplinary responses at a regional/state level are covered in TasNetworks Emergency Response Procedure (R0000709295).
- Unanticipated discoveries of contamination during excavations. For this situation refer to the Unanticipated Contamination Finds Procedure (R0002403267).
- Planned worked involving ground mounted asset replacements where potential leaks and contamination has been identified prior to work. For these works, refer to the Contaminated Land Standard (R0002403289) and the Soil Management Near Ground Mounted Assets Work Practice (IMS-WPI-13-91).

3. Definitions

For the purpose of this Standard, the following definitions have been adopted:

Leak – The release of a substance that has occurred over a period of more than one week

Spill – The release of a substance that has occurred over a period less than one week

Sensitive receptors – People, environments or organisms that are more susceptible to impacts of hazardous substances. These include residential areas, schools, waterways, important habitat or agricultural areas.

4. General Requirements

4.1 Spill prevention and preparedness

The following should be implemented to minimise the likelihood and potential impact of a spill:

- Undertaking regular inspections of equipment, including checking for leaks or degradation;
- Conducting scheduled preventative maintenance work on oil filled assets
- Storing minimum amount of hazardous substances necessary
- Storing hazardous substances on or within bunded areas
- Ensuring spill response kits relevant to the type and volume of substance being managed are accessible at depots, work sites, in vehicles and at substations.

4.2 Key principles of spill response

Given the variability in the nature and severity of spills, spill response often varies between spill events. Despite this, there are key principles that should be followed to ensure effective and consistent spill response.

These key principles are outlined below and should be used to inform spill response, regardless of the substance, volume or setting:

- The Four C's of spill response (Control, Contain, Communicate, Clean up) provide for systematic, overarching process and form the foundation of spill response. Refer to Appendix A for more information.
- Reducing the impact of substances on sensitive receptors must be prioritised during spill response.
- Spill response must not impact the environment more than the spill itself. Consultation with the Environment & Sustainability Team should be undertaken to assess the risk and impact of spill response.
- In addition to the above, the approach to spill response must be informed by any requirements specified by land managers/owners, regulatory authorities (i.e. EPA) or other key stakeholders.

4.3 Spill Management Plans

When handling or transporting hazardous substances, a suitable spill management plan should be prepared and available to all personnel. All personnel handling the substances should be familiar with the management plan and have the skills and knowledge to action it.

A spill management plan must:

- Outline the actions to be taken in the event of a spill
- Detail the required resources, such as spill kits, required
- Outline an incident reporting and documentation process.

For Controlled Waste, spill management plans must adhere to the Environment Protection Authority Controlled Waste Transport Spill Management Plan Guide.[1]

4.3.1 TasNetworks spill management plans

The following work practices outline the spill management plan for relevant substances. These plans outline the practical, step by step process for responding to spills.

- Oil & Fuel Spill Management Work Practice (IMS-WPI-00-91)

[1] https://epa.tas.gov.au/Documents/Controlled%20Waste%20Transport%20-%20Spill%20Management%20Plan%20Guide.pdf

- Asbestos, CCA Ash, Lead & Mercury Spill Management Work Practice (IMS-WPI-00-90)
- Spill Response Crew Work Practice (IMS-WPI-0-89)

5. Oil Spill Response

Oil spills are the most frequent type of spill at TasNetworks due to the number of oil filled assets in the network. The practical process for responding to oil spills is included in the relevant work practices outlined above. However, the following section outlines the requirements and standards for oil spill response.

5.1 Resources & response level

The following resources should be utilised for the three spill scenarios. These are a guide only and specific scenarios may require a different approach.

Spill description	Clean up personnel	Resources	Support	Relevant Work Practice
Spill is able to be contained and cleaned up manually by first responders with spill kits	First responders – crews/fault	Spill Kits Shovels Bags	E&S Team	Oil & Fuel Spill Management Work Practice (IMS-WPI-00-91)
Spill is not able to be contained or cleaned up by first responders	Spill Response Crew	Spill Trailer Excavator Skip bin	E&S Team	Spill Response Crew Work Practice (IMS-WPI-0-89)
Spill is on water or is in a sensitive area	Spill Response Crew, E&S Team, Consultant	Spill Trailer Excavator Skip bin Vacuum truck	E&S Team Contamination Consultant State Oil Spill Control Officer	Spill Response Crew Work Practice (IMS-WPI-0-89)

5.2 Spill Response Responsibilities

Spill response requires a multi-disciplinary approach and is often time sensitive. TasNetworks has both external and internal resources to effectively respond to spills. Appendix B outlines the steps, process and role responsibilities for spill response for TasNetworks personnel.

5.3 Land owner or occupier engagement

Where a spill occurs on private property, the land owner, occupier or manager must be notified. The nature and extent of the spill must be communicated as well as the plan for clean up and site reinstatement. The owner should be advised to stay away from the spill site, and where water storage or edible gardens are impacted, they should be advised to discontinue use until clean up and validation sampling has occurred.

5.4 Validation sampling

It is important that TasNetworks ensures spills are effectively cleaned up. Often this assurance can be achieved visually, however there are some circumstances where validation sampling is required. Validation sampling involves sampling the spill impact area following clean up to verify that all the oil has been removed or that the residue oil is at an acceptable risk level.

Circumstances where validation sampling is required include spills where:

- The EPA requests validation sampling when the spill is reported
- The spill has entered a non-flowing waterbody
- There is evidence of oil on/around a non-flowing waterbody
- The spill occurs within or adjacent to school grounds
- The spill involved greater than 300L of oil releasing
- The spill is confirmed as PCB and it occurred in a residential area or on private property
- The spill impacts an edible garden

5.5 Site reinstatement

Spills and spill response can often impact the infrastructure or natural environment of a site. For example, soil may have to be removed, requiring an area of grass or vegetation to be removed. Infrastructure, such as fences or driveways, may be damaged or removed during the spill response.

Spill sites should be reinstated as much as practically possible to reduce the impact of the spill on site amenity or use. The scenarios outlined in Table 1 are not exhaustive but include common impacts and actions.

Table 1 – Site reinstatement actions

Impact	Site reinstatement actions
Removal of soil	Soil similar to the properties of the soil removed should be reinstated (i.e. top soil replaces top soil, gravel replaces gravel)
Removal of grass	Where more than 5m^2 of grass has been removed, the soil must be reseeded as natural reseeding is unlikely.
Removal of vegetation	Where a significant amount of vegetation is required to be removed, revegetation may be required. Consultation with the land owner/manager must be undertaken to determine the appropriate reinstatement actions.
Removal or damage of structures, such as fences, sealed pavements on private property	Oil residue must be removed from the structure or the item should be replaced in consultation with the land owner/manager and the Customer Advocacy Team.

6. Waste management

Waste generated from spill response and clean up must be managed in accordance with TasNetworks Waste Management Procedure.

All spill response clean up equipment and contaminated soil/structures must be treated as potentially contaminated. Waste classification, storage and disposal must be undertaken in accordance with the *Tasmanian EPA Information Bulletin No.105 – Classification and Management of Contaminated Soil for Disposal.*

The transport of waste materials, including damaged transformers, must be undertaken in accordance with the *Environmental Management and Pollution Control (Waste Management) Regulations 2020.* For TasNetworks Personnel, transport must be undertaken in accordance with the TasNetworks Controlled Waste Transport Work Practice (IMS-WPI-00-88).

7. Reporting

7.1 Internal Reporting

Any uncontained spill must be reported to the E&S Team as per the One Hour Rule. All spills or slow leaks are to be reported as incidents in SAP as per the Incident Response Procedure. The person who is the first responder should report the incident via SAP.

The following items are to be compiled where applicable:

- Relevant information pertaining to the spill, cleanup and disposal is recorded against the SAP ID, including photos, analytical results, disposal certificate and EPA communications.
- ICAM Investigation – A post spill incident investigation report (ICAM) may need to be completed when determined by the risk rating and uploaded to the corresponding SAP ID.

The E&S Team will conduct a risk assessment to determine the incident classification as described the spill consequence matrix outlined in HSE Incident Classification Matrix.

For internal reporting purposes, the incident is considered “reportable” where an EPA report is submitted following a full risk assessment.

7.2 External Reporting

Under section 32 of the *Environmental Management and Pollution Control Act 1994* (EMPCA), TasNetworks is required to report incidents or process malfunctions resulting in a pollution event that causes material or serious environmental harm.

The E&S Team will determine whether a spill is reportable under section 32 of EMPCA through undertaking an assessment of spill nature and extent.

Where the spill may potentially cause material or serious environmental harm based on the information provided to the E&S Team at initial reporting, the EPA must be notified by phone. A full assessment must then be undertaken by the E&S Team once all the information from the incident is collated.

If, following this assessment, the spill is deemed to have caused material or serious environmental harm, a report (prepared by the E&S Team) must be submitted to the EPA. If the assessment does not deem the spill to have caused material or environmental harm, no follow up is required with the EPA (unless requested by the EPA during the notification call). This logic is outlined in Figure 1.

For oil spills that enter estuaries or marine waters, the State Oil Spill Control Officer (SOPCO) is to be notified by contacting the EPA’s 24-hour pollution hotline on **1800 005 171**. The SOPCO will then make an initial assessment and advise other relevant authorities as prescribed in the Tasmanian Marine Oil and Chemical Spill Contingency Plan - TasPlan (epa.tas.gov.au).

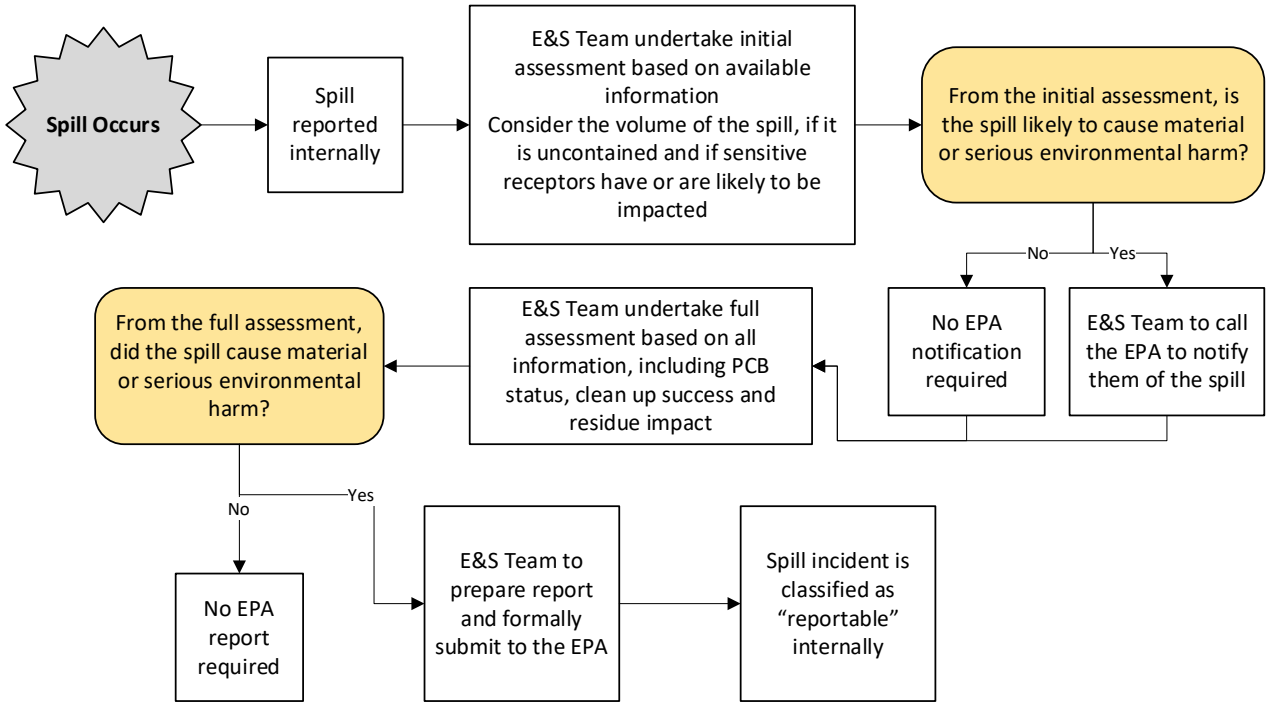

Figure 1 Spill response EPA reporting process

8. Assurance & training

8.1 Assurance

Inspections and audits will be undertaken periodically against the requirements outlined in this Standard.

8.2 Training

Relevant TasNetworks team members will be provided with training and awareness to implement their responsibilities are per this Standard. The training will be reflected in the ESI Competency Matrix and the E&S Training and Awareness Framework. It is the responsibility of Team Leaders to ensure their team members participate in the required training.

Contractors must ensure all their employees are competent and educated to implement the requirements in this Standard and must undertake the required TasNetworks training as per TasNetworks Learning Management System.

9. Related Documents and Compliance Requirements

9.1 Internal documents

Document Number	Document Title
R0000112530	Environment Handbook
IMS-WPI-00-88	Controlled Waste Transport Work Practice
IMS-WPI-00-91	Oil & Fuel Spill Management Work Practice
IMS-WPI-00-90	Asbestos, CCA Ash, Lead & Mercury Spill Management Work Practice
IMS-WPI-0-89	Spill Response Crew Work Practice
R0000502077	Hazardous Substances Management
R0000502101	Waste Management Procedure
R0001602080	Incident Management Procedure
R0000112684	Personal Protective Equipment Procedure
R0002302565	ESI Competency and Authorisations Implementation Manual
R0002333457	Environment & Sustainability Training & Awareness Framework

9.2 Compliance requirements

Document Title, Section or Part
Environmental Management and Pollution Control Act 1994
Environmental Management and Pollution Control (Waste Management) Regulations 2020
Information Bulletin No.105 – Classification and Management of Contaminated Soil for Disposal, Tasmania EPA

10. Document Control

Version	Date	Amended by	Comments
1.0	2 June 2023	Katie Lawrence	Original version for publishing

Appendix A – Foundations of Spill Response

Control	• If safe, the source of the spill should be isolated to prevent the spill from becoming worse (such as plugging and sealing cracks).
Contain	• The spill should be contained by appropriate means such as surrounding it with appropriate absorbent booms or constructing an earthen bund. • The area should be safely secured and where possible place signage around the spill area to prevent unnecessary access.
Communicate	• Notify personnel working in or near the area of the spill occurrence. • Contact relevant Team Leader and the HSEQ Team as per the ONE HOUR RULE to ensure appropriate resources are allocated and spill event is recorded. • Capture photographs and provide site information to include as part of incident recording and reporting.
Clean Up	• Spills should be cleaned up by means of absorption (converting a liquid spill into a solid enabling clean up). • A range of absorbent materials are supplied in the spill kits including absorbent booms, absorbent pads, granular absorbents, disposable bags and ties. • The method of disposal is dependent upon the nature and extent of the spill.

Appendix B – Spill Response Responsibilities & Process