

Port Talbot Operating Procedure PT-OP-001: Responding to Chemical Spills

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1.00 PURPOSE AND SCOPE

This document outlines the procedure to be followed when cleaning up spills and leaks, and disposing of the resulting waste. It gives instructions for spill response equipment and training. It is also used to provide a guideline for drivers or other company representatives attending a customer site.

2.00 DEFINITIONS

None.

3.00 REFERENCES

Safe Storage and disposal of used oil: PPG8, Environment Agency

3.01 Supporting Documents

Procedure 28: Emergency Preparedness & Response

Procedure 30: Incident Reporting and Preventive and Corrective Actions

Procedure 35: Waste & Effluent Management

Site Operating Procedures: PT-OP001 - Responding to Chemical spills,
PT-OP002 – Site Emergency Plan (part of TATA's plan)

Form 1015: Environmental Incident Report

Form 1020: Waste Transfer Authorisation

Form 1025: Spill Response Equipment Checklist

Form 1037: List of Approved Waste Contractors – Port Talbot

Form 1044: Emergency Response Drills - Spills

Form 1045: Emergency Response Drills – Leaks

Form 2026: Contact Telephone Numbers (emergency response) – Port Talbot

Changes to this issue: First Issue					
Originator	Title	Date	Approvals	Title	Date
 C. Harling	Environmental Manager	10/12/2015	 Mike Porretta	Site Manager	10/12/2015
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4.00 PROCEDURE

- 4.01 Before approaching a spill or leak, large or small, it is important to know what the product is and also to be aware of the spilled material's potentially hazardous properties; the product could, for example, be corrosive, flammable, or release toxic gases. Note that all liquids in use or stored on all sites have the potential to be classified as corrosive, dangerous or toxic to the environment and can include but not be limited to Hydrochloric acid, Ferrous chloride, Sodium hydroxide, Hydrogen peroxide, Nitric acid to name but a few.

Ensure that the correct PPE is worn during clean-up. When handling a spill or leak, unless the operator is fully aware of what the product is. It is necessary to wear the following a full chemical suit, rubber boots, rubber gloves, safety goggles/face shield. Any work carried out in a bunded area automatically requires the wearing of a full chemical suit, rubber boots, permit to work, etc.

If it is not safe to clean-up the spill, staff are to contact the TATA Pickling Line Team Leader. Details can be found on Form 2026 – Contact Numbers (emergency response) – Port Talbot

Uncontained spills/leaks

- 4.02 Cordon off the spill area to restrict access. Consult the relevant Safety Data Sheet (SDS) to determine which spill response action should be taken. All sites have spill kits available, Form 1025: Spill Response Equipment Checklist, should be completed when using the spill kit. However, there may be times where it is more economical to replace the whole kit and use the old bin as a method of containing the contaminated waste.
- 4.04 Stop the source of the spill as soon as it is safe to do so, in order to prevent further growth. Tip up drums; shut off valves etc.
- 4.06 If it proves difficult to bring the spill under control, it may be decided to seek outside help staff are to contact the TATA Pickling Line Team Leader. Details can be found on Form 2026 – Contact Numbers (emergency response) – Port Talbot
- 4.07 In the event of the uncontained spillage reaching the surface water drains, it is essential that staff are to contact the TATA Pickling Line Team Leader, asking for the following information to be passed over to the Energy Department asap. Details can be found on Form 2026 – Contact Numbers (emergency response) – Port Talbot

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Contained spills/leaks

- 4.08 A spill/leak contained within a bund, must be removed as soon as possible. Allowing the spill to remain within a bunded area indefinitely, may have the following adverse consequences:-
- The capacity of a bund to contain any further spillages could be compromised.
 - Over time rainwater and residues will accumulate, further reducing the bund's storage capacity.
 - Any corrosive spills could potentially damage the bund structure; attack tanks, associated pipework, etc., located within the bund.
 - The contained chemical may emit noxious gases, which could potentially harm people working and living in the vicinity.
 - Other personnel /contractors may not be aware of the hazardous nature of a bund's content and could therefore sustain an injury when inadvertently coming into contact with the spilled chemical.
 - Accumulated rainwater which has been contaminated by the spilled material must be disposed of as hazardous waste if being sent off-site for disposal.
- 4.09 On discovering a bund filling with product- as a result of a ruptured or over-flowing tank, leaking pipework, pump(s), valve(s) etc notify the site manager immediately.
- 4.10 Again, it is important to deal with a spill in a conscientious and safe manner. Ensure that appropriate PPE is worn, (consult the relevant SDS if necessary), and stop the source of the spill as soon as it is safe to do so.
- 4.11 Note that the spilled material must be removed from the bund for either disposal or recovery as soon as possible.
- Disposal: If the spill cannot be recovered. Using Form 1020: Waste Transfer Authorisation, complete the form so that the waste product can either be treated by the second part of the effluent treatment system (operated by Tata) or Industrial Chemicals can arrange for it to be sent off site for disposal via an approved waste contractor. Approved waste contractors can be located on Form 1037: List of Approved Waste Contractors – Port Talbot
- Recovery: Gain authorisation to discharge the spilled material into a clean tank, drum or IBC as appropriate.

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Spillage/Leakage of chemicals delivered to site

4.12 Industrial Chemicals can have raw materials delivered in the following containers:-

- Bulk Lorry
- IBC's
- Pressurised Pump-over containers
- 205l drums
- 50l drums (known as poly-drums)
- 25l drums (known as poly-drums)

The Port Talbot site is owned by Tata, the Industrial Chemicals plant is located on the TATA site. All product container systems are checked on a regular basis and those that fail to meet the standard for the containment of the product are either sent for repair (Bulk containers & pressurised pump-over containers – these are both manufactured using metal and as such fairly easy to repair/patch, and then inspected to ensure that the fault has been repaired). IBC's & plastic drums have a known life span and once this end date has been reached, they are taken out of use and sent for either disposal or recycling.

4.13 If the container starts to leak or there is a spillage, the driver will stop the discharge and notify a member of staff of the situation and they will instruct the driver to act within according of the site procedure. It is expected that for the site delivered to, Tata will have a similar sort of procedure for dealing with a spill or leak as Industrial Chemicals. At all times on the Tata site, the driver will act in accordance with the site rules and adhere to instructions from the site.

Training

4.14 It is the site manager's responsibility to ensure that personnel have received training in the use of spill response equipment and PPE. Forms 1044 and 1045 which allow for the training of what to do in the event of a spill or a leak. These forms are generic and factor in all possible products that could be held on an Industrial Chemicals Site.

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Post-Incident Investigation

- 4.15 It is the responsibility of the Site Manager to carry out an investigation in order to identify how the spillage occurred and how such an incident can be avoided in the future. Form 1015, Environmental Incident Report, shall be completed for this purpose and signed off by the Environmental Manager on completion of the investigation and any follow-up action that was required. Preventative measures identified must be reported to Senior Management by the Environmental Manager.

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