

Company Directive

STANDARD TECHNIQUE : EN2A/6

Relating to Oil and Fuel Spill Prevention, Reporting, Containment, and Response Actions

Policy Summary

This Standard Technique describes spill prevention and emergency response measures including the use of spill kits and other actions to be taken in the event of spillage of oil, fuel or other hazardous substances. It also addresses arrangements for reporting of incidents.

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Approved by



Policy Manager

Date:

9 September 2015

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Implementation Plan

Introduction

This document provides information on the reporting of and responding to environmental incidents on the network and at WPD sites..

Main Changes

New Emergency Response arrangements are detailed following new contract award.

Impact of Changes

Very minor incidents meeting the criteria set out in this ST will no longer have to be reported to the EA. They will, however, still have to be reported into CROWN.

Implementation Actions

Distribution Managers and Team Managers with responsibility for yards and storage areas shall familiarise themselves with the ST to ensure reporting requirements are clear for compliance .

Implementation Timetable

This Standard Technique can be implemented with immediate effect.

Document Revision & Review Table		
Date	Comments	Author
21/01/2016	Updates to reflect new business Emergency Response Arrangements	M. Lovely
20/03/2015	Update to set out different reporting process for very minor, controlled incidents at WPD depots. Details of new spill kit equipment / provision added	M. Lovely
30/05/2013	Update to incident reporting procedure	J. Russell
30/04/2013	Updates to account for the CROWN incident reporting tool. Appendix F removed – environmental incident investigation form now in CROWN. Details on new spill equipment added. As of 01/04/13 the Environment Agency in Wales is now known as Natural Resources Wales.	J. Russell / M. Lovely

1.0 INTRODUCTION

- 1.1 Equipment present on the Distribution network and its associated activities have the potential to cause pollution to land and water. The company must ensure that the risk of pollution is appropriately managed and that incidents are responded to quickly and effectively in line with the company's Pollution Prevention Policy.

2.0 PREVENTION OF OIL SPILLS

- 2.1 WPD must aim to prevent spills occurring in the first place. This is done through routine inspection – eg see ST SP2A, risk assessments and taking action to repair leaks when they are found. (see also CA11B relating to cable fluid leaks).

- 2.2 There are some additional specific requirements applying to use of oil drums and bowsers:

- When it is reasonably practicable, do not remove drums from vehicles or trailers when working on site – use a hose. Unless the delivery end is being directly coupled to a valve on the equipment, this hose must be fitted with a tap or valve at the delivery end which closes automatically when not in use. Hose end connections which are not self sealing, e.g. by an automatic valve, shall be fitted with bungs as soon as they are detached.
- If drums do have to be removed from the vehicle or trailer, assess the way in which they have to be moved to the place where they are to be used, to minimize manual handling and risk of damaging the drum.
- When at site, the drums must be located in a drip tray having at least 25% of the drum capacity, or stored indoors. Such drip trays may be of rigid metal or plastic or collapsible types which have been made for the purpose. If containment cannot be provided a site specific risk assessment must be carried out identifying control measures to be applied to control the pollution risk.
- If it is necessary to leave drums or bowsers containing oil on site, the time they are on site must be kept to a minimum and the site must be secure. Storage should be as described above.
- Bowsers must have their oil discharge valves locked shut when not in use. If they have permanently attached flexible pipes, these must also be fitted with a lockable valve or pump at the discharge end and this has to be locked when not in use.

3.0 INCIDENT REPORTING AND NOTIFICATION PROCESS

3.1 All environmental incidents must be reported to the Environment Agency / Natural Resource Wales on their Freephone number (0800 807060) with any spill above 20 litres being classed as a major spillage. The information that they will require is detailed in section 3.5 of this document.

An exception to this reporting rule are incidents which meet the following criteria:

- They occur at a depot / stores area completely within WPD control
- They occur on concrete / impermeable surface
- They have NOT entered any drainage
- They are completely cleaned up by staff leaving no possible residual environmental impact
- They involve no more than a 1 – 2 litre spill

These incidents MUST still be reported in CROWN. The box next to “No EA report following agreement with Environment Team” should be ticked.

If there is any doubt whether the incident qualifies contact the Environment Team for clarification or apply caution and report the incident to the EA in any case.

All incidents should be reported to the Environment Agency / Natural Resources Wales without delay.

However small spills, typically less than 20 litres, and which are contained, occur out of hours and are not in close proximity to any watercourse, may be reported to the Environment Agency / Natural Resource Wales during the next working day if more practical to do so.

3.2 Reporting

It is the responsibility of local Team Managers or Standby Managers to ensure that incidents are reported to the Environment Agency / Natural Resources Wales;

Incident Reporting Hotline 0800 807060 (24 hours)

Local Team Managers must also ensure that environmental incidents are reported in the CROWN Incident Reporting Tool to capture the details, generate the notification email and to record the CROWN incident investigation.

3.3 In the case of an incident occurring which has a significant environmental impact the escalation process detailed in Appendix D should be followed. The Network Services Manager will decide, on the basis of the extent of the incident, whether it is necessary to advise WPD Corporate Communications or the CEO.

- 3.4 The Environment Team will assess the incident for severity, escalate it to corporate managers as appropriate and assign staff to carry out investigations into the cause of the incident.
- 3.5 The Environment Agency / Natural Resources Wales will need to know the following detail:
- The type of incident that has occurred (what is the nature of the release)
 - The location of the incident
 - The name or properties of the substance that has been released
 - The quantity (approximately)
 - Where it has been released to
 - What time the incident occurred or was discovered
 - Who else has been informed (e.g. emergency services, waste contractor, managers)
 - What actions have been taken so far (including actions arranged with the emergency response contractor)
- 3.7 If assistance is needed on site to deal with the incident appropriately the Emergency Response Provider will need to be contacted. The Environment Agency / Natural Resources Wales may request that you do this. In all cases refer to Appendix B for details of how to contact the Emergency Response Provider.
- 3.8 If you require non-emergency follow-up waste services, contact Biffa 0845 608 6093.
- 3.9 Completed investigation details need to be entered into the CROWN Incident Reporting Tool to make the information available to managers and the Environment Team. This will allow trend analysis and the sharing of learning points.
- 3.10 Following the initial clean up of the incident follow up work may be required to address hidden pollution resulting from the incident. On more serious incidents, which have been attended by the Emergency Response Provider, a Post Incident Evaluation report will be produced to advise if further investigative work is required or if the incident can be safely closed out. Liaison with the contaminated land specialists should involve the local Distribution Manager, the Project Manager and the Environment Team.

4.0 CONTAINMENT AND RESPONSE ACTIONS

If oil, fuel or any other hazardous substance is spilt, action must be taken by staff on site to contain the spillage, *when it is safe to do so*, and the prescribed incident reporting process as detailed above must be followed. Depending on the size of the spill and the possible extent of the resulting pollution, the response actions will vary.

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Emergency Response key steps are shown below and in the flowchart in Appendix A.

Environmental Guidance Notes EGN 3 and 4 provide more detail.

With the exception of small spills, typically 20 litres or less, which can be dealt with by WPD staff, clean up operations will normally be undertaken by an approved contractor – see Appendix B.

Where WPD staff are cleaning up small spills PPE as detailed in ST SP2LD shall be worn. Good hygiene shall be observed, as normally required for oil handling. Used containment/clean up materials shall be bagged in impervious plastic bags and transferred to the nearest WPD Depot for safe keeping until it can be passed to the WPD waste disposal contractor for onward disposal as "Hazardous Waste". (Because of the mixture of oil and soil etc it cannot be classed as "general" waste).

4.1 Spill Response

12 Steps to Containment and Spill Response

1. Be aware – make sure that you know the risks and where you can find the spill kit on your site. Locate your nearest spill kit before you start work.
2. Extinguish all sources of ignition – ensure no smoking.
3. Raise the alarm – at the very least you may need assistance
4. Identify the spilled material – What are the risks? Can you handle it or do you need the emergency services?
5. Protect yourself – make sure you have the correct PPE that is adequate for the job
6. Help the injured – but only if it is safe to do so.
7. Stop the source if it safe to do so – do you need to turn off valves or taps, or block a hole?
8. Contain the spill – get the booms in place and cover drains as soon as possible. Decide if you can handle the clean up effectively yourself or if specialist assistance is required (note – if spill has entered a watercourse the emergency response contractor should **ALWAYS** be contacted for assistance).
9. Follow the prescribed incident reporting process for your area
10. Clean up if you are able to do this yourself – work from the outside towards the centre of the spill
11. Waste disposal – contain, store and dispose of waste correctly in accordance with legal controls as detailed in ST EN3 Waste Handling
12. Restock the spill kit – make sure you have the kit to do the job

4.2 Purpose made oil spill kits have been provided as follows

- Large kits moved from site to site by Major Projects, when project work involving bulk oil equipment is taking place. These are contained in yellow "industrial size" wheelie bins. Two each of these are based at 132kV and Major Projects locations at

Feeder Road, Sowton, Pool, Ffynnon Menter, Church Village and Ty Coch. In the Midlands van spill kits are utilised within WPD and Major Projects Principal Contractors arrange the provision of spill kits appropriate to the projects.

- Site kits held at all 132kV sites with bulk oil circuit breakers and some other 132kV sites where they can provide "coverage" for surrounding 132kV sites. One site kit is held by each Network Services depot to cover 33kV, 11kV and distribution sites. These are contained in yellow "domestic" size wheelie bins.
- A small mobile kit is carried on all drum trailers and fuel bowsers. These are contained in yellow plasticised bags about 600mm x 400mm x 150mm.

All the kits are available through E5.

5.0 USE OF SPILL KIT COMPONENTS

- 5.1 **Pads** - These are small rectangular sheets of absorbent material, each about 40 x 50cm and each capable of absorbing about 0.9 litres of oil. They can be used for small spills and are dropped on to the surface of water/oil mixtures to take up the oil. Can also be used to block a holes and drains if no pillows available.
- 5.2 **Socks** - These are each 120 cm long white "sausages" and are laid around the base of equipment for initial control of spills, or can be laid around drains to prevent oil from going down drain. Could be used to stuff holes if no pillows available.
- 5.3 **Pillows** - These are "pillow" like, about 38 cm x 18cm and are highly absorbent and have tear resistant covers. Use them to plug holes and drains.
- 5.4 **Booms** - These are very long "sausages", each 3 metres long, with hooks at each end to secure them. They are used in a similar way to the socks above, but can also be tethered across small streams etc to float on the surface of the water and prevent oil from floating away on the surface of the water.
- 5.5 **Drain mats** - These are bentonite clay filled mats 65 x 45 cm, and are rested on the ground to completely cover over a drain, and are to be pressed into the ground and so moulded to cover the irregularities in the ground around the drain. Two can be used together for larger drains.
- 5.6 **Sweeps** - only contained in the Large kit. These are very long "folded blankets" with loops at each end to secure a rope. Each is 30 metres long and 48 cm wide. They are used where a surface film of oil remains on still water, to provide a final "clean up", by slowly pulling it across the surface of the water.

5.7 **Other** - The mobile and site proprietary kits also contain goggles, gloves and, for wrapping up used materials, disposable bags. The site and large kit "wheelie bins" can themselves be used as a container for bags of used material.

5.8 **Quickie-Bund** – This item should be carried as part of spill kits on large vehicles used to carry oil or generators. Available in three sizes the Standard 250 Litre model should be used for most applications.

It features a foldable bund and has a large, lightweight, heavy-duty plastic bag attached via a non-return valve. The quickie-bund can be quickly deployed to catch liquids as they spill from damaged drums or tanks thereby preventing environmental damage. Emergency response contractors can then remove the full bag.

6.0 **OTHER EMERGENCY CONTAINMENT OPTIONS**

6.1 If there is no spill kit immediately available on site, or if a spill kit's contents have been used up, there are some other simple emergency measures which can possibly be used, depending on availability of material/equipment.

6.2 **Drain blocking** - Plastic bag(s) e.g. carriers, bin liners etc filled ideally with clay soil, but otherwise with sand, soil etc can be tamped down a drain to seal it. If not available use rags.

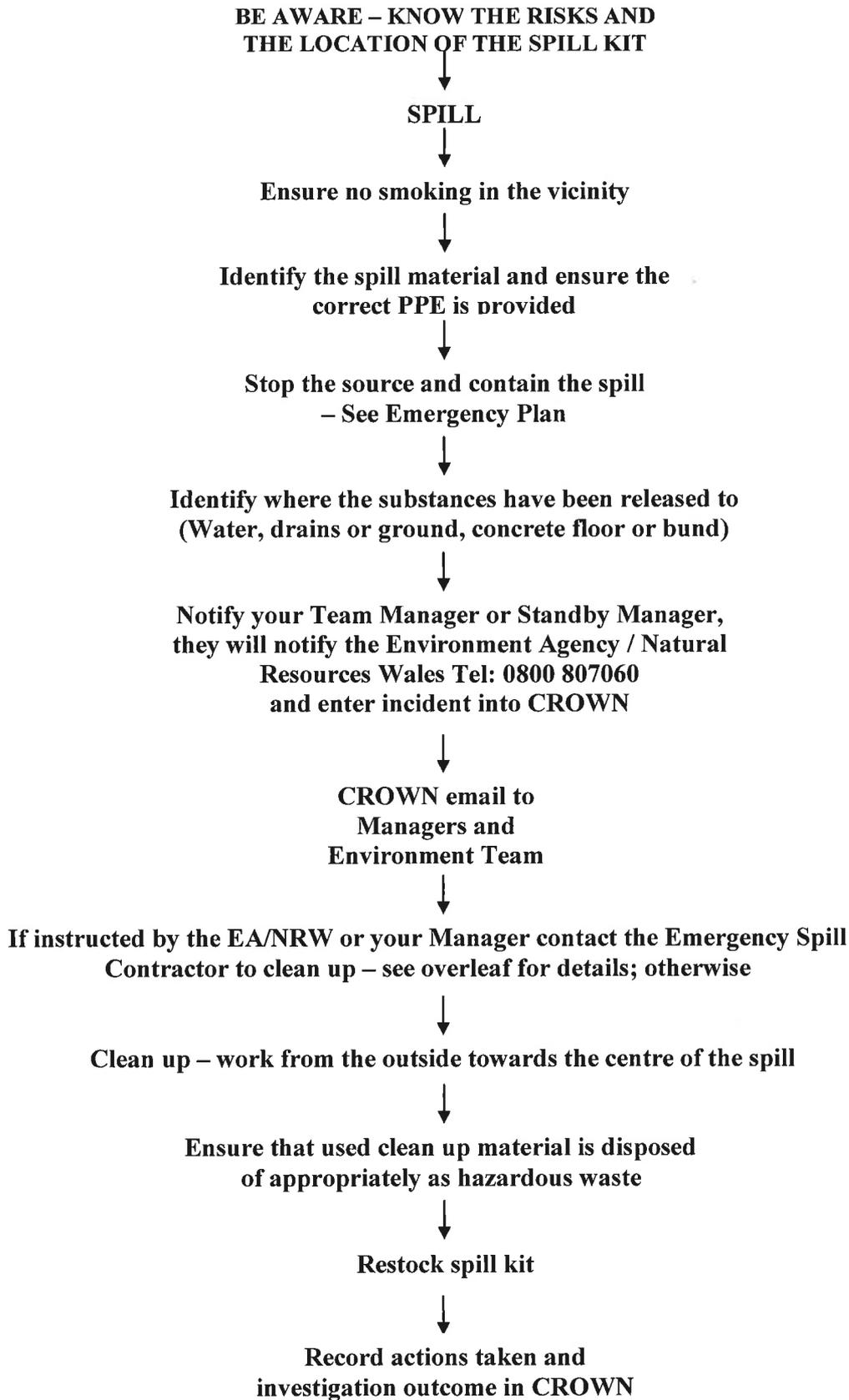
6.3 **Create bunds** - Excavate soil, ideally clay/sub-soil to create a bund wall to stem flow and to divert around drains.

6.4 **Dig diversion ditches** - Dig ditches to divert flow or to create "reservoir" for spill.

6.5 **Create boom across stream** - A plank wedged into the banks of a small stream and extending an inch or two above water level and say five or six inches below water level, will have some benefit in preventing flow downstream of oil floating on the surface of the water.

Alternatively a wire fence stretched across a small stream with straw or hay placed against the upstream (oily) side of the fence at water level and extending down into the water can also be effective at containing oil on the water surface.

INCIDENT REPORTING PROCESS



APPENDIX B

EMERGENCY OIL SPILLS - APPROVED CONTRACTORS FOR ALL WPD AREAS

Company Name & Address	Main Telephone No	Emergency Telephone No	Contact	BOSCA Level	Response Time	Notes
Adler & Allan Unit 4b, Lovett Road, Hampton Lovett Trading Estate, Droitwich, Worcester, WR9 0QG	01905 794351	0800 592827 (24hr)	Henry Simpson / Steve Welch		3 hours	Anywhere in WPD Area

Incidents in the Southwest Region will be responded to our of Adler and Allan's Exeter depot after initial reporting via the free phone emergency number.

Incidents in the South Wales region will be responded to our of Milford Haven / Swansea / Droitwich after initial reporting via the free phone emergency number.

CONTENTS OF SPILL KITS

Details of all Spill Response Equipment available from the approved supplier together with codes and lead times are held on the Purchasing Catalogue under “Goods – Safety / Environment – Oil Spill Equipment. All items can be ordered via E5.

If the item you need is not on the list please contact the supplier and discuss your requirements with them in order to procure a suitable product as a one-off. Please also inform the Environment Team so the product can be assessed and potentially be added to the E5 list.

ENVIRONMENTAL INCIDENT NOTIFICATION AND ESCALATION PROCESS

Information regarding environmental incidents of a serious nature is required to be escalated within the company to ensure all appropriate response actions are taken. Environmental incidents requiring escalation are categorised as those that:

- Give rise to serious environmental effects
 - Breach consents or authorisations
 - Are likely to result in legal action being taken
 - Are likely to result in a Civil Sanction being issued
 - Have a threat of legal action being taken.
-
- These more significant incidents require notification and escalation as follows:
 - EA category 2 incidents are escalated by the Environment Team to the area DM and the Policy Manager.
 - EA category 1 incidents are escalated by the Environment Team to the area NSM as well as the area DM and the Policy Manager.
 - Any incidents upgraded from category 2 to category 1 are escalated by the area DM to the area NSM.
 - The area NSM is responsible for escalating and onward notification of the incident to the WPD Directors and the CEO.
 - The area NSM / DM will seek guidance from the Policy Manager to determine the best course of action to deal with the incident.
 - The area NSM / DM is responsible for coordinating the actions to deal with the incident, keeping the Environment Team informed as the actions progress.
 - On conclusion of the incident the Environment Team must be informed of the outcome and the incident closed out on the WPD Incident system.
 - The Environment Team hold details of relevant DMs and NSMs for notification and escalation in the business.

APPENDIX E

ENVIRONMENTAL GUIDANCE NOTES

For a brief overview of guidance, display on site and environmental overall awareness.

EGN 3	Spill Control
EGN 4	Water Pollution Prevention
EGN 5	Environmental Incidents

ENVIRONMENTAL GUIDANCE NOTE 3

SPILL CONTROL

WHAT?

Accidental releases of oil and chemicals make up a large number of pollution incidents that occur each year.

Many spillages can be prevented. It is important that everyone in a WPD depot or site knows how to control a spill to minimise its impact.

Would you know what to do?



WHY?

- **Minimise potential harm:** Spills spread very quickly and lead to environmental harm
- **Avoid prosecution:** Fines and clean up costs can be expensive
- **Public relations:** Avoid negative publicity for the company and impact on customers.

Do

- ✓ STOP WORK immediately
- ✓ If spillage is flammable, extinguish all possible ignitions
- ✓ Identify the source of pollution and rectify the problem – seek help if required
- ✓ Contain the spillage – on land use earth / sand or absorbents from the spill kit to construct a bund around the spill to stop it spreading. Use booms to contain oil spills that have already entered a watercourse.
- ✓ Contact your Line / Standby Manager
- ✓ Put on appropriate PPE – rubber gloves and boots, goggles, impervious disposable coveralls.
- ✓ Protect sensitive areas (e.g. watercourses or surface water drains – use drain covers or use earth / sand to construct a bund).
- ✓ Clean up the spill. Use absorbent granules or pads to mop up spills. Large pools of oil or spills which cannot be absorbed should be removed by a gulper.
- ✓ Dispose of all contaminated material (soil / absorbents) correctly – those containing substances such as oil, diesel or paint will be hazardous waste. Ensure that any contaminated water is taken to an appropriately licensed disposal site.
- ✓ Notify your manager of actions taken

Don't

- ✗ DON'T ignore it! STOP WORK and ACT immediately
- ✗ DON'T hide the incident – ensure you report it and implement controls
- ✗ DON'T ever hose a spill into the drainage system. Always use absorbent materials



ENVIRONMENTAL GUIDANCE NOTE 4

WATER POLLUTION PREVENTION (FUEL & OIL)

WHAT?

A large number of oil related water pollution incidents occur each year.

Discharging fuel or oil or water containing fuel or oil into drains (foul or storm water) or watercourses is illegal.

Many pollution incidents are from unbunded tanks and can easily be avoided by following simple guidelines.

WHY?

- **Avoid prosecution:** Western Power Distribution or you, as an individual, can be prosecuted for causing water pollution.
- **Cost:** The costs of clean up far exceed those to put control measures in place
- **Damage to wildlife:** Long-term damage to watercourses including fish kills. Oil spreads rapidly – one gallon of oil can completely cover a lake the size of two football pitches.

Do

General

- ✓ Store oils away from drains or watercourses
- ✓ Return oil and fuels to storage areas after use
- ✓ Locate oil stores away from areas of high vehicular movement to prevent accidental damage.
- ✓ Bund individual 205 litre drums to 25% of total volume
- ✓ Supervise all fuel deliveries
- ✓ Lock oil stores when not in use
- ✓ Use drip trays under all static plant and during refuelling from mobile plant.

Bulk Storage

- ✓ Bund tanks and bowzers to 110%
- ✓ Ensure that bunds are free from cracks and leaks.
- ✓ Regularly empty bunds and drip trays of rainwater which should be treated as contaminated.
- ✓ Keep all hoses and pipe work within bunded area after use.
- ✓ Keep a spill kit near to fuel and oil storage areas and refuelling areas.
- ✓ Report any irregularities or incidents

Don't

- ✗ DON'T refuel or store oil within 10m of watercourses or surface water drains.
- ✗ DON'T leave bunds and drip trays to overflow.
- ✗ DON'T leave refuelling hoses outside of bunds after use.
- ✗ DON'T use high pressure delivery systems when filling small containers.
- ✗ DON'T hose down spills
- ✗ DON'T ignore spillages



ENVIRONMENTAL GUIDANCE NOTE 5

ENVIRONMENTAL INCIDENTS

WHAT?

Although accidental releases of oils and fuels make up the majority of environmental incidents, there are a large number of other events that constitute an environmental incident.

These have to be treated in the same way as any spillages and need to be reported, logged and responded to as environmental incidents.



WHY?

- **Minimise potential harm:** Serious Environmental damage can result from a variety of events
- **Avoid prosecution:** Fines and remediation / compensation costs can be expensive
- **Public relations:** Avoid negative publicity for the company and impact on customers.

What constitutes an Environmental Incident?

- ✓ Sudden Equipment / container failure
- ✓ Slow leaks from plant and equipment
- ✓ Fluid filled cable leaks
- ✓ Spillages from drums or bowzers
- ✓ Spills / leaks from vehicles or generators
- ✓ Hydraulic pipe failures
- ✓ Release of substances due to vandalism or accidental third party actions including damage inflicted by animals
- ✓ Road Traffic accidents
- ✓ Pollution from fire / explosion including fire services run off.
- ✓ Unplanned damage to sensitive or protected sites (SSSIs)
- ✓ Unplanned damage to crops
- ✓ Unlicensed interference with protected species
- ✓ Fly tipped materials on our sites
- ✓ Damage to sewer infrastructure
- ✓ Escape of SF6
- ✓ Jointing compound spill (mixed or unmixed)
- ✓ Cross contamination of waste containers

What you need to do

- ✓ Assess the incident for its severity and decide if you need help dealing with it.
- ✓ Report the incident – follow the reporting procedure for your area
- ✓ Ensure the incident is dealt with correctly – depending on the type of incident you may need to involve various staff in its resolution.
- ✓ Ensure you involve the appropriate regulator for the type of incident



Native Derbyshire Grassland damaged during cable laying

APPENDIX F

SUPERSEDED DOCUMENTATION

This document supersedes ST:EN2A/5 dated July 2013 which should now be withdrawn.

APPENDIX G

ASSOCIATED DOCUMENTATION

POL EN2 - Pollution prevention measures and associated STs relating to distribution system and non-operational property specifically.

A useful practical reference which has been utilised in the preparation of this ST is -
IEEE Guide for Containment and Control of Oil Spills at Substations - ANSI/IEEE Std 980-1987

Legislation on pollution.

Spill Training dvd – available from Policy Team (Avonbank and Pegasus)

CROWN Incident Reporting Tool User Guide

APPENDIX H

IMPACT ON COMPANY POLICY

Limited - as spill kits have already been provided other than for Network Services Depots.

The function of this document is to provide staff with practical information on actions to be taken in the event of a spill.

APPENDIX I

IMPLEMENTATION OF POLICY

Immediate.

APPENDIX J

KEY WORDS

Incident reporting, Environmental Agency / Natural Resources Wales, watercourses, spill response and spill kits.