

# Spill Response Procedure

## 1. Introduction

A number of materials with the potential to be hazardous to the environment are used and stored at the University. This procedure defines the emergency procedures to ensure that incidents occurring which have a potential risk of pollution to the environment are dealt with in a safe manner to ensure minimal environmental impact.

## 2. Definitions

**Spill** – When a substance escapes its ordinary container. Spills may include oils, chemicals, solid waste, firewater pollution entering the drainage system and drainage system failures.

**Minor Spill** – Small spill (Less than 5 litres or less than 1m diameter) which is contained

**Significant Spill** – Where a significant (greater than 5 litres) spill occurs

**Major Spill** – A spill of over 50 litres and where the substance spilled enters drainage system, soil or surface waters

**Pollution incident** – Incident or set of circumstances where there is likely to be a spill or leak of a substance, as a result of which pollution has occurred, is occurring or is likely to occur

**Emergency Incident** – When a spill results in or may result in a pollution incident.

**Key Staff** – Persons who have responsibility for maintaining equipment containing oils or chemicals, managing equipment containing oils or chemicals or accepting deliveries of oils or chemicals. Key staff are trained in spill response.

**Key locations** – Areas where deliveries of oils or chemicals takes place, oils or chemicals are used and oil and chemical storage areas. Staff are trained in spill response and spill kits are stored on site.

**Dynamic Risk Assessment** - A continuous process of observing, assessing and analysing an environment to identify hazards and remove risk while completing a task i.e. they require some quick decisions about safety.

**Major Incident Response Plan (MIRP)** - This is the University response document setting out command and control protocol's, plans and procedures for a major incident.

## 3. Scope

This procedure applies to external (outdoor) spills and emergency incidents (as defined above). It covers the Canterbury and Medway campuses and all staff at these locations.

Indoor spillages are not usually pollution incidents. Unless spilt liquid exits the building, either directly or via drainage systems, only safety and janitorial arrangements apply.

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## 4. Responsibility

**Divisions and/or Departments** are responsible for ensuring that adequate spill response materials are available at key locations, identifying key staff and ensuring they have received training on how to deal with spills in their area of responsibility. Where key staff are present they are responsible for conducting the spill response as detailed in this procedure.

**Health, Safety and Environmental Sustainability** are responsible for providing training for key staff in spill response (via e-learning), testing emergency response procedures, advising on assessment of spill risks, and checking spill response training and provision of spill materials through internal audit.

**Campus Security** are responsible for attending spills on request and initiating the appropriate response detailed in this procedure.

**Estates Facilities management** are responsible for cleaning up minor spills on request and ensuring that used absorbents are disposed of correctly.

**All staff** have a responsibility to report spills to campus security.

## 5. Emergency Preparedness

Key staff should undertake spill response training provided by **Health, Safety and Environmental Sustainability and hosted on the University's Moodle platform** every 3 years in line with the University's Environmental Management System training schedule (EMS-Training). This training may be accessed directly from Moodle, may be arranged through the Training and Development Officer (Estates and Commercial Services Staff only) or by contacting the Sustainability Manager ([c.morris@kent.ac.uk](mailto:c.morris@kent.ac.uk)).

Emergency response will be tested at least annually, and aim to cover all key locations over a 5 year cycle.

Spill kits and copies of the spill response procedure should be kept in **key locations** and be accessible in an emergency. Spill kits are currently located in the following areas:

- Landscape and Grounds Yard (Oil only)
- Estates Maintenance Yard
- Science Supplies yard
- Workshops (where chemicals and/or oils are used)
- Laboratories
- Catering Outlets/Cooking Oil storage locations
- Campus security vehicles
- Landscape and Grounds vehicles
- Estates FM office area, Medway building
- Estates FM Caretakers office

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## 6. Spill Response

### **On discovering a spill**

If a spill has occurred in a key location, determine the location of the spill kit and any staff trained in spill response and initiate the spill response procedure as detailed by this document. If the spill covers a large area or there is potential of risk to human health or safety, campus security may be contacted to help secure the area.

For all other areas, spills should be reported immediately to **Campus Security**.

Staff should not attempt to deal with spills of hazardous materials unless they are trained in spill response and have adequate personal protective equipment (PPE) and spill kits.

### **Spill Response Procedure – Minor or Significant Spills**

#### **Step 1: Ensuring personal safety**

The first responder should **dynamically risk assess the situation rapidly** as follows:

- Size and nature of spill – this will determine the level and type of response
- Competence/authority – **someone trained in spill response** should assume responsibility for this procedure
- Call Campus Security if appropriate
- Evacuate and secure the area if appropriate

As soon as possible the **liquid or solid should be identified** by checking labels on containers or asking staff working nearby. Unless you are certain of the health risks and precautions to be taken obtain the Safety Data Sheet for the liquid or solid and seek advice from management urgently.

**Use appropriate and adequate protective clothing (PPE)** and consult management if in doubt.

**End of Step 1** - If there is an immediate danger to the safety of persons and/or buildings, the Emergency services should be contacted and no further action taken to address the spill unless advised by the emergency services on site.

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## Step 2: Emergency Action

If possible stop the **spill or leak at source** to prevent the spilt liquid or solid from spreading further.

**Protect vulnerable drains** with drain covers or mats.

**Protect watercourses and soils. Divert the flow away from vulnerable areas and restrict to one area using the correct absorbents or** , if not available, take all possible steps to prevent the liquid from entering watercourses (drains, streams, rivers etc.) and soil. In the interests of speed and effectiveness other appropriate means to prevent further spread can be used if necessary, e.g. containing oil with earth.

**Contain the spill.** Using the correct absorbents ensure the bulk of the spill is fully absorbed and can not escape further.

**End of Step 2** - If the spill is not contained then our external contractors Adler& Allen should be contacted to attend and no further action taken to address the spill unless advised by the Adler & Allen on site.

## Step 3: Remedial Action

**Clean up the remainder of the spill** using the correct absorbents as appropriate depending on the nature, location and size of the spill. Do not flush to drain.

**Collect used/soiled absorbent and containment products** carefully and correctly. Note: Absorbents do not neutralise hazardous liquids so in handling and disposal observe the same safety and environmental precautions as for the spilt liquid.

In some cases, the responders may contact Estates to carry out some or all of step 3. Where this occurs the responders must stay at the location until Estates arrive. This is to ensure that there is no risk of the spill escaping further (in case of rainfall or through vehicle activity) and that no hazardous materials or waste are left unattended.

Ensure that used containment products are described accurately on labels and paperwork.

Contact Estates FM (to arrange appropriate disposal of used spill materials).

**End of Step 3** - If the spill has not been adequately cleaned up (some residue or staining remaining) then contact Estates FM to inform them a clean-up is required.

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## Step 4: Follow-Up

**Discuss with management** and other relevant persons how the spill might have been avoided and/or how to improve the speed and effectiveness of response. Where the incident has taken place away from key areas, the e-safety incident report will determine where and who the incident should be discussed with.

**Re-stock the spill kit** and order new materials where required

**Report the incident to Health, Safety and Environmental Sustainability** via the e-safety reporting system

### Spill Response Procedure – Major Spills

In the event that a major spill occurs, campus security must be contacted. The first responder must dynamically assess the potential risk to humans, buildings and the environment. Campus Security supervisors have responsibility for deciding if the emergency services or emergency spill response service is required or for initiating the University Major Incident Response Plan (MIRP).

Our Emergency Spill response providers are Adler and Allen. In an Emergency contact them on 0800 592 827.

The decision to report incidents to the Environment Agency lies with **Health, Safety and Environmental Sustainability** and all incidents should be reported via the e-safety system as soon as possible

If the incident occurs out-of-hours or the key staff detailed above are unavailable the Environment Agency Emergency hotline (0800 80 70 60) should be called if:

- Significant volumes of hazardous materials or foul water have entered the surface water drainage system
- Hazardous materials or foul water has entered controlled waters (ponds, streams, rivers)

The responder may use discretion in assessing the potential impact of the incident when deciding if the Emergency hotline is required depending on the volume, composition and dilution of the spill and the sensitivity of the receptor.

## 7. Reporting Incidents

All spills and near-misses should be reported to **Health, Safety and Environmental Sustainability** Via the e-safety reporting system

**Health, Safety and Environmental Sustainability** have responsibility for notifying the relevant authority (Environment Agency, Water Companies etc...) if necessary.

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