POLLUTION PREVENTION NOTE - SPILLAGE RESPONSE, DEC. 2019

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This Plan has been compiled by Estates Services and is to be used in the unlikely event of a spillage of oil or other substances that may escape into the environment. This Plan does not cover mercury or other spills that occur within a laboratory or other internal spaces. Advice on how to deal with these may be found on the University's Health and Safety website.

1.0 Introduction

1.1 Spillages have the potential to cause significant environmental harm, threaten water supplies and public health in and around the numerous University buildings and facilities. The most obvious threats are spillages of oils and chemicals, but consideration should also be given to apparently innocuous materials such as milk, coffee and tea from Halls of Residence or catering facilities. These substances have the potential to strip oxygen from freshwater sources.

1.2 In many cases, major pollution incidents can be prevented, if appropriate pollution prevention measures are in place or immediately available. It is the duty of all members of the University to ensure that where possible, they do not knowingly contribute to such an incident.

1.3 A spillage, may possibly breach environmental legislation and in doing so, it could lead to possible court costs or fines if prosecuted by the Scottish Environment Protection Agency (SEPA). Spillages may remain undetected or untreated for some time, with the effects being substantial, but not immediately evident. A spillage that occurs and spreads beyond the University's property onto private or public land, may attract unwanted adverse publicity to the University, especially as the cost of remediating any contaminated land or water is extremely high.

1.4 Land values and usage potential can be changed if it becomes contaminated, and the effects of polluting groundwater, ponds streams, rivers are well documented.

2.0 Common Causes of Spillage

2.1 Pollution incidents tend to result from a combination of causes, which include:

- Inadequate storage tanks, bunds, valves and pipework.
- Lack of means of containment and appropriately intercepted drainage systems where
- Products and vehicles are stored and handled, and where vehicles are washed down.
- Unforeseen equipment or installation failures.
- · Inadequate procedures and non compliance with procedures, including overfilling of
- tanks and other containers and accidental spillage during delivery/transfer and transport of products.
- Leaks due to vandalism, sabotage and fire.

- Lack of awareness or deliberate illegal disposal leading to misuse of surface waters for disposal of chemicals.
- Inappropriate use of soakaways.
- Road traffic accidents where fuel or oil tanks are ruptured.
- Lack of briefing and supervision of contractors working on site.

3.0 Types of Spillage

3.1 Some minor spillages will be within the capability of the University to deal with and clear up. The Estates Grounds Department holds a comprehensive spill kit at the John Anderson Campus. Those major spills that are outside the capabilities of the University to clean up will require the assistance of a specialist contractor such as K&N Services based in Perth, (telephone 01821 640201).

4.0 Prevention

4.1 Good management practices and common sense will reduce the risk of spillages. To enhance this, the Estates Environment Office regularly inspects all of the University's oil tanks and completes risk assessments (see Appendix 1).

The following should be implemented in areas that are designated as high risk:

- Ensure that the integrity of any storage medium and its associated delivery point are inspected on a regular basis.
- The personnel designated to receive deliveries of fuel/oil should receive practical training as to how to use the spill kits, as the drivers of the tankers do in order to receive their licence.
- The designated personnel should also be aware of any potential areas in their vicinity that are at risk of contamination, such as surface water drains.

5.0 Actions to be Taken Following a Spill

5.1 Any person discovering a spill should take the following immediate actions:

- Stop the flow of fuel/oil if possible. Any pumps should be stopped and switched off. Where a spillage occurs during a pipeline receipt, pumping should cease immediately.
- Take measures to protect life, including your own. If you have first aid skills, then render them to any injured person, and if possible, remove them from danger.
- If the spillage occurs during pumping, prevent the spread of fuel/oil and its escape into the surface drains by using the spill kits carried by the tanker driver.
- If the spillage is discovered in the course of a normal working day, the person discovering it should attempt to prevent the situation from becoming worse by any reasonable practical means.
- Immediately report the incident to the Estates Helpdesk on 0141 548 2614 giving your name, location of spill, substance and amount spilled and number of any injured personnel.
- Stay at the scene until a member of the Estates Team arrives, who will decide on the further course of action.
- If the spillage is discovered out of hours, the University Out of Hours Team on x3333 must be alerted prior to contacting a specialist contractor or the local Fire Brigade.

6.0 General Health and Safety Precautions

6.1 The main risks to health and safety of personnel involved in the spillage/pollution operation are:

- Fire/explosion
- Inhalation of toxic fumes
- Contamination of skin/body surfaces
- Asphyxiation due to oxygen starvation

6.2 All members of the University should be aware of the risks, and should consider the following guidelines when dealing with a spillage:

- Approach the spillage from an upwind direction
- Wear the appropriate protective clothing
- Remove the contaminated clothing as soon as possible
- Seek medical advice if ill effects are experienced
- Do not smoke
- Do not operate electrical or battery powered equipment, unless told it is safe to do so.
- Do not eat or drink with contaminated hands or whilst wearing contaminated clothing

7.0 Removal of Contamination and Disposal

7.1 Used absorbents are classified as special waste, and are therefore covered by the Special Waste Regulations 1996 (as amended). These regulations implement the European Hazardous Waste Directive 91/689/EEC, and their purpose is to provide an effective system of control for wastes that are difficult to handle. They ensure that dangerous wastes are soundly managed from their production to their final destination for disposal or recovery.

7.2 Personnel involved in a spillage that required the utilisation of an absorbent have a Duty of Care to:

- Ensure that all used absorbent is placed into sealed double black bags prior to disposal.
- Label the bags effectively and store them safely and securely.
- Contact the University Estates Environment Office to arrange for the disposal of the waste using the appropriate route.
- Ensure that the contractor who removes the waste is in possession of the correct legally required paperwork i.e. a consignment note. The University's copy should be passed onto the University Estates Environment Office, who will then retain it for three years.

7.3 Oils and other contaminated materials recovered from a spillage are also to be disposed of as Special Waste, including contaminated soil.

8.0 Useful Contact Numbers

8.1 The following is a list of useful contact numbers:

University Estates Services Office, Tel: 0141 548 2164

University Estates Out of Hours Service (7pm to 7am), Tel: 0141 548 3333

K&N Services Perth, Tel: 01821 640201