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Work Instruction**

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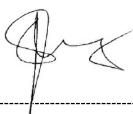
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1. INTRODUCTION

This work instruction will detail the control, containment, remediation, and notification measures to be undertaken in the event of a hazardous materials spill that has the potential to cause injury, damage, and/or environmental harm.

2. SUPPORTING CLAUSES

2.1 Scope

2.1.1 Purpose

To establish a Work Instruction that Eskom Rotek Industries will use in responding to the accidental release (spillage) of Hazardous Materials that may occur on any Eskom Rotek Industries SOC Ltd premises. This Work Instruction applies to all employees, contractors, visitors, and suppliers.

2.1.2 Applicability

This document shall apply throughout Eskom Rotek Industries SOC Ltd.

2.1.3 Effective Date

This document shall be effective once authorised.

2.2 Normative/Informative References

Parties using this document shall apply the most recent edition of the documents listed in the following paragraphs.

2.2.1 Normative

- a) ISO 9001 - Quality Management Systems.
- b) ISO 14001 - Environmental Management System.
- c) ISO 45001 - Occupational Health & Safety Management System

2.2.2 Informative

- a) ERI Waste Work Instruction (240-95405655)
- b) Eskom Environmental Incident Management Procedure (240-133087117)

2.3 Definitions

Definition	Explanation
Ash spillage	Refers to the spillage of ash (residue remaining from the burning of coal) or water containing ash, whether it is in its dry form or in the form of a slurry from any ashing activity on site that is released into the environment (including land or water, but excluding atmospheric and fugitive emission), which could or does result in an environmental impact.
Carcinogenic	Having the potential to cause cancer.
Clean-up	The action of remediation, and may include soil excavation or solvent soil wash.
Containment	The prevention of the spreading of an oil spill.

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Definition	Explanation
Drip	Where continuous dripping takes place and can result in pooling of the oil.
Environmental Legal Contravention	An incident where a provision of environmental legislation (national, provincial, or local) and/or a condition of an environmental approval (for example, environmental authorisation, water use license, waste license, license in terms of the National Forests Act) or any other legal document issued in terms of environmental legislation is contravened. (An environmental legal contravention incident is considered a breach in terms of compliance reporting.)
Hydrocarbon	An organic compound (such as acetylene or butane) containing only carbon and hydrogen and often occurring in petroleum, natural gas, coal, and bitumens
Leak	A continuous dripping that will result in pooling of hydrocarbons that will require corrective action
Spill	The accidental, unauthorised release of a Hazardous Material into the surrounding environment
Weep	Where no free-running hydrocarbon is visible, but the area is damp with hydrocarbon. It will be an area where dust is accumulating but no effective loss of hydrocarbon is evident

2.4 Abbreviations

Abbreviation	Explanation
ERI	Eskom Rotek Industries SOC Ltd
PCB	Polychlorinated biphenyl
SDS	Safety Data Sheet
SHEQ	Safety, Health, Environment, and Quality

2.5 Roles and Responsibilities

The person who is responsible for/or discovers a spill is responsible to report it to his/her SHEQ Officer/Site Foreman/H&S Representative.

- 2.5.1 The Responsible Manager shall be responsible for:
Ensuring that all requirements of this document are implemented
- 2.5.2 The SHEQ Manager shall be responsible for:
- Communicating the requirements of this document.
 - Ensuring that all employees within the relevant division are familiar with this document.
 - Monitoring the level of conformance towards the requirements of this document.
- 2.5.3 Environmental Officer (or appointed representative) shall be responsible for:
- Coordinate regular inspections of the condition of spill kits and response trailers (if applicable).
 - Coordinate training required in this Work Instruction.

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- c) Schedule audits to verify efficiency and compliance of spill response procedures for blasting contractors.

2.5.4 ERI Employees and Contractors

- a) Containing, cleaning up, and reporting spills in line with this Work Instruction.
- b) Notifying their Supervisor when site spill kits are running low on absorbent material.

2.5.5 Site Foreman / Supervisor

- a) Will be the spill kit owner and be responsible for ensuring:
 - i) Determining the number of items needed through the risk assessment process
 - ii) The spill kit is appropriately labeled and the clean-up Work Instruction is displayed.
 - iii) Replenishment of the used absorbents and ensure that the spill kit contains all stipulated contents and is checked monthly.
 - iv) Where appropriate, assistance, coordination, and implementation of spill response by employees and contractors under their supervision.

2.5.6 Blasting Contractor

- a) The Blasting Contractor shall comply with all the requirements for emergency and spill response as required by the Occupational Health and Safety Act and Regulations (Act 85 of 1993), as well as the Explosives Act (Act 15 of 2003).
- b) The blasting contractor will be responsible for compiling an approved spill response procedure pertaining to explosives.
- c) This Work Instruction will be submitted to the SHEQ Department before the commencement of a contract.
- d) All relevant documentation will be kept by the Contractor.

2.6 Process for Monitoring

- 2.6.1 Visual inspections will identify hydrocarbon spills.
- 2.6.2 Compliance with this procedure will be assessed during internal audits.
- 2.6.3 Monthly checklist to be completed for oil spill kits (Oil Spill Kit Checklist 240-166342636)

2.7 Related/Supporting Documents

- 2.7.1 Hydrocarbon Spill Assessment and Feedback form (240-94026543)
- 2.7.2 Environmental Incident Register (240-94026547)
- 2.7.3 Oil Spill Kit Checklist (240-166342636)

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3. ERI SPILL RESPONSE

3.1 Spill Prevention

Spill prevention measures will be implemented based on residual ratings assigned to impacts in the environmental aspect and impact assessments. Preventative measures shall include, but not be limited to, using drip trays, parking on impermeable surfaces, parking within bunded areas, etc.

3.2 Assess the Risk

From the moment a spill occurs and throughout the response, determines risks that may affect human health, the environment, and property. ALWAYS put SAFETY FIRST. If possible, identify the spilled material and determine how much was spilled.

3.3 Select Personal Protective Equipment

Choose the appropriate PPE to safely respond to the incident. Consult SDS and literature from chemical and PPE manufacturers for the best recommendations. If the extent of the risk is not clear, or the characteristics of the spilled material are unknown, assume the worst and use the highest level of protection.

3.4 Limit the Spillage

3.4.1 Immediate corrective action to limit the spillage is essential in minimising the potential environmental damage and reducing the remediation costs. This can involve actions such as:

- a) Closing valves;
- b) Placing leaking containers or equipment into drip trays or bunded areas;
- c) Collecting the spilled material in a container located underneath the leak or channeling the leak into a container.

3.5 Containing the Spill

3.5.1 Any spill must immediately be prevented from spreading. Hydrocarbon-containing materials (Oil, diesel, etc.) must be prevented from entering a water body such as drains, stormwater systems, dams, or rivers. Containment of the spill at the source will minimise pollution and will enable easy cleanup and/or remediation. The following can be done to contain a spill:

- a) Soil barriers;
- b) Sandbags;
- c) Bund walls;
- d) Absorbent material.

3.6 Removal of Hydrocarbons

The free hydrocarbons shall be captured and put into a suitable container such as a drum or tanker for proper disposal. Disposal must take place as soon as possible. Disposal must comply with the requirements set out in the ERI Waste Work Instruction.

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3.7 Final Clean-Up/Remediation

- 3.7.1 After removal of excess material, sawdust, absorbents or solvents shall be used to complete the clean-up of the spill. This might include the removal of leaking equipment, cleaning of pavements, removing contaminated soil and vegetation, as well as disposing of clean-up equipment.
- 3.7.2 Any absorbing material shall be disposed of as hazardous waste at a class A registered landfill site.
- 3.7.3 The volumes of absorbed material disposed of shall be reported as contaminated waste.
- 3.7.4 Where a PCB-containing substance was spilled (refer to SDS to confirm the presence of PCBs), the spill must be treated with caution, as PCB is carcinogenic. If the PCB content is not known, the material shall be treated as if it contains PCB until it can be proven otherwise.

3.8 Spill Kits

To allow for immediate response and clean-up of a hydrocarbon spill, all sites, as well as vehicles handling oil and other hydrocarbons, shall have access to a basic spill kit. The vehicle spill kit shall be a smaller version of the onsite spill kit that meets the basic requirements for the volume of chemical transported.

3.9 Training

All employees working in areas where the potential for a hazardous material spill exists shall be trained in the use of the spill equipment, reporting, and Emergency Response Procedures.

3.10 Process for Reporting

- 3.10.1 Determining the significance rating of the hydrocarbon spill on-site by making use of the Hydrocarbon Spill Assessment and Feedback form.
- 3.10.2 All hydrocarbon spills shall be assessed. Minor, moderate, and major hydrocarbon spills shall be reported and investigated.
- 3.10.3 Hydrocarbon spills classified as “insignificant” shall be managed on-site (Environmental Incident Register), and reported (as insignificant) to ERI Environmental Department every month, using the Environmental Month Report.
- 3.10.4 ALL hydrocarbon spills that occur into a watercourse shall be reported as an incident.
- 3.10.5 The process for Environmental Incident Management (240-133087117) shall be followed.
- 3.10.6 The site shall ensure that spills are contained, cleaned, and disposed of properly. Safe disposal certificates shall be kept on file as proof of disposal.

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3.11 Existing Hydrocarbon Spill on Site

- 3.11.1 Where work is to be carried out on-site and existing contaminated soil is evident around the unit to be worked on, the relevant Supervisor shall record and photograph the condition of the contamination before work is done.
- 3.11.2 The Client or Client Representative shall be notified to witness the contaminated area before commencement of work and sign acceptance thereof.
- 3.11.3 An assessment and action plan shall be done in compliance with the contaminated land requirements of the National Environmental Management: Waste Act.

3.12 Waste Spills

- 3.12.1 Risk assessments for waste transportation (ERI Logistics – Waste Division) shall assess the risk and required mitigation for the type of waste that is transported.
- 3.12.2 Waste spills shall be managed in accordance with the Environmental Incident Management Procedure (240-133087117)

3.13 Ash Spills

- 3.13.1 Ash spills shall be managed in accordance with the Environmental Incident Management Procedure (240-133087117) and the Position paper on ash spillage, ash water spillages, and illegal dumping of ash ENV16-L009

4. ACCEPTANCE

This document has been seen and accepted by:

Name	Designation
Nalini Ramnarian	SHEQ Business Partner - Transformer and Switchgear Services
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5. REVISIONS

Date	Rev.	Compiler	Remarks
11/11/2021	1	A Bothma	Due for Review. Waste spills included Ash spills included Oil spill kit checklist form included

6. DEVELOPMENT TEAM

The following people were involved in the development of this document:

- Anélia Bothma

7. ACKNOWLEDGEMENTS

Not applicable.

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