



FS_ITA03



Industrial and Trade Activities

Preparing a Spill Response Plan (SRP)

What is a “spill”?

A spill occurs when a material (not naturally found in harmful quantities in the environment), is accidentally discharged from a container or an activity, into or onto ground.

Pollution occurs when a substance soaks into the ground or escapes into a waterbody. Even small amounts of pollution can injure and kill aquatic life or make water unsafe for human use.

Substances we consider harmless, for instance food stuffs or silt, can have significant adverse effects on ecological systems.



Remember:

- Speed of response to a spill event is vital to minimising pollution.
- Every spill has the potential to contaminate our land and water.
- If a substance is too dangerous to leave lying around on the ground, it is likely to harm our beaches and streams. Washing it down the stormwater system only transfers the problem to a location more difficult to control.
- Careful planning of facilities and operations can reduce the risk of spills. Simple precautions can prevent a spill from becoming a pollution incident.

- You have a legal responsibility to avoid, remedy or mitigate the effects of a spill on the receiving environment. This may include removing residue from the stormwater system, stream bed and stream banks, restocking fish and nursing injured bird life.

AUP: Permitted Activity Requirements

All sites are required to prepare and implement a spill response plan to avoid discharging contaminants from site. If you or your staff spill something and do not have a plan in place to prevent pollution to water or land, you are exposing yourself to serious financial and legal risk, as well as unnecessarily harming our environment.

It is a legal requirement to develop an SRP if you use, store or transport environmentally hazardous substances.

- Companies and individuals are legally responsible for dealing with any foreseeable incidents that may occur while carrying out their activities. They have a legal duty to avoid, remedy or mitigate any harm to the environment resulting from their activities.
- If daily activities include the use, storage or transport of any substance capable of causing environmental harm, it is foreseeable that a spill of that substance will occur at some time
- If companies and individuals can demonstrate that they were adequately prepared to deal with a spill and took all reasonable steps to clean up following an incident to minimise any harm to the environment, they are less likely to be punished by the court.
- If you need to quickly wash a spill away for safety reasons, you **must** identify the receiving environment to assess whether the spilt material can be captured at an alternative location such as somewhere within the stormwater system or at the outfall.

The Law

The Polluter Pays: The Resource Management Act 1991 (RMA) is a law designed to protect our environment. It is illegal for any substance to be discharged into rivers, lakes and streams, or into the stormwater system, or land or air unless authorised by resource consent or a district or regional plan. Polluters can be fined up to \$2000 for an individual or \$4000 for a company, issued abatement notices, or prosecuted and fined up to \$1,000,000 for an individual or \$10,000,000 for a company for breaching the RMA.

Landowners: You are responsible for any work on your land. Make sure the contractor you hire knows how to do the job properly.

Employers: you are responsible for the actions of your staff. Make sure you train them well and give them the proper tools to do the job correctly.

Workers: You are responsible for doing the job in a manner that does not breach the environmental protections put in place by your employer. If you cause pollution, you and/or your company could be held liable for clean-up costs and/or penalties.

Relevant AUP Permitted Standards:

E33.6.1.1 - Land Use

*E33.6.1.1(2) A spill response plan is prepared where any environmentally hazardous substance is handled, used or stored on land at a quantity greater than used for domestic purposes. These plans must meet the requirements of **Table E33.9.1** as relevant and be supplied to the Council on request.*

You must also contact Auckland Council's Pollution Hotline on (09) 377 3107.

E33.9.1 – Special information requirements

Under the provisions there is a minimum requirement for what a Spill Response Plan is required to cover. See the table below to check the contents of your SRP against

Spill Response Plan requirements		✓ or ✕
(i)	A protocol/method for identifying and stopping the discharge of environmentally hazardous substances to land or water and avoiding future events of this nature	
(ii)	Emergency containment and clean-up procedures	
(iii)	A list of appropriate spill kit contents to enable the containment and/or absorption of spilt material and a plan showing the location of the spill kits	
(iv)	A requirement for appropriate signage to identify the location of spill kits and the actions to be taken in the event of a spill	
(v)	Actions to remedy or mitigate any adverse effects on the environment or public health and safety arising from the discharges or spills of environmentally hazardous substances to land or water	
(vi)	Methods for disposal of spilt environmentally hazardous substances and any other contaminated materials used in the spill clean-up	
(vii)	A schedule of adequate training for personnel in the use of the emergency spill response plan and in anticipating and preventing the likelihood of spills	
(viii)	Up-to-date and accurate copies of all drainage plans for the land on which the industrial or trade activity is undertaken showing the location of the final discharge point to the public stormwater system or to land or water	
(ix)	A procedure for notifying as soon as practicable Council's 24-hour emergency response service and the relevant stormwater or wastewater network operator in the event of any discharge of environmentally hazardous substances that results in, or is likely to result in, contamination of any stormwater system, or land or water	
(x)	Methods for disposing of any spills in a secondary containment device. The plan must set out how it will be disposed of in an appropriate and authorised manner	

Appropriate collection and disposal:

A spill response procedure requires correct clean up and disposal of recovered substances and contaminated equipment (used absorbent pads etc) to ensure that the effects are not just relocated to be discharged in another manner or location.

Clean Up Options	Waste Disposal Options
Use a vacuum or road sweeper to collect spilled material	Collect spilt material in a manner that allows for reuse or recycling of your spilt product or material
Soak up spilt material with suitable absorbent product, then collect saturate waste for disposal	Ensure commercial waste bins used for disposal do not leak.
Block all catchpits that drain the area of the spill and use as a sump for collection by pump out truck	Properly treat and/or store hazardous waste prior to disposal at an appropriately licenced facility
Trade Waste (if your site has a Trade Waste Agreement with Watercare)	Ensure all waste disposal is through a responsible and authorised commercial waste contractor.

Preparing your own SRP -

Step		Contents
1	Assess your risk	- Identify and clearly label all substances. - Understand the hazards associated with each substance used, stored or transported. - Obtain the Material Safety Data Sheets (MSDS) for all substances you use. - Identify locations and causes of any past spills, plus possible high-risk areas and activities
2	Reduce your risk	- Adequately contain and/or cover high-risk areas such as loading docks, decanting and process areas to prevent rainwater intrusion and contamination. - Ensure that delivery, storage and processing areas allow for the containment of a spill. - Minimise the volume of substances stored at your site. - Use less hazardous materials, for instance water-based rather than solvent-based inks - Always keep work areas clean, tidy and safe
3	Prepare	- Cover each area of risk in your plan. Be specific. - Consider 'worst case' and 'most likely' case scenarios. - Map out your site's drainage system (access points, connection so public systems and discharge points to natural waterways). Clearly label stormwater drains on site and on your map. - Record and post notices on-site giving contact names and numbers for emergency assistance and waste disposal agencies. - Compile spill response kits with equipment for containment, clean-up and safety to deal with the substances you use.
4	Draft Your Plan	- A specific and detailed plan for training purposes and a concise, one-page version for posting at high-risk areas.
5	After a spill – review and restock	- Immediately restock all spill response materials used. - Report all incidents that require a clean-up response to management. - Review your SRP and update as necessary to be better prepared and endeavour to prevent similar accidents from reoccurring.
6	Train your staff	- When they join your company, and at regular intervals to ensure staff preparedness and swift action in the event of a spill.

At home, if you spill paint, oils, or household chemical outside, prevent it from flowing into external drains or contaminating land. Collect the spilt material in a container that can be closed and dispose of via the domestic rubbish if it is safe to do so.

Keep in mind:

Do not wash spilt material or residues into stormwater drains because external drains may flow untreated, directly into local streams and harbours



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