

Green Skip Services Ltd

Spill Emergency Response Plan

(SERP)

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Introduction

This Spill Emergency Response Plan has been developed to provide a formalization of mechanisms in place in the event of accidental spills.

Whilst care is always taken to minimize the risk of potential spills, accidents could happen. The Green Skip/G.S.Rec site is used, amongst other things, for the temporary storage of materials pending treatment or export for treatment. Materials in storage include hazardous substances (including solvents, sludges, acids etc) which could potentially feature in an accidental spill.

Should a spill occur on-site, this SERP outlines the necessary steps to be taken to contain the spill, clean it up, decontaminate the spill area and dispose of the resulting spill debris, as well the contact details and roles of key personnel.

General Scope and Purpose

The following Spill Emergency Response Plan applies to the MRF site located at Ramla Road, Maghtab, L/O Naxxar operated by Green Skip Services Ltd and G.S. Rec Ltd, including buildings and grounds as per attached site plan and block plan. (Annexe A and page 2 of Annexe B (reporting form) respectively).

The purpose of this SERP is to create mechanisms to minimize the hazards to personal health or the environment in the event of a spill.

The provisions of this plan include:

- Reducing the probability of serious injury or death due to inadequate response to an emergency situation.

- Ensuring an effective and smooth transition to Emergency Operations, including situations that call for a partial or total evacuation of the facility. (The evacuation procedure including plans is specifically described in the Health and Safety Manual.)

This emergency action plan is designed to accomplish the following:

- Create a policy and establish a plan to be followed in case of emergency.

- Create and sustain personnel awareness.

- Reduce the possibility of environmental incidents through proper procedures.

- Organize and train employees for emergency action to facilitate cleanup.

- Ensure the rapid resuming of normal operations.

During any emergency situation the safety and welfare of personnel shall take precedence.

Environmental protection shall take precedence over the protection of physical assets of the company.

Nature and quantities of chemicals on-site

A list of all materials stored on-site is kept at all times. The list varies continuously depending on movement into and out of the site and is updated accordingly.

Description of potential emergencies

Materials in liquid or sludge form are stored on-site in the appropriately constructed storage sheds. The sheds, referred to as 'Bins', have impermeable flooring, one open end and ventilation in the ceiling, and no contact with sources of electricity. There are frequent fire-points and spill absorbent material is located in easily accessible locations throughout the storage areas. The material is generally contained in metal or plastic drums or IBC's, depending on the type and amount. All containers are placed on wooden pallets.

All containers transported to the site are visually inspected for integrity and no obvious signs of leaks. In the case of a leaking container the material is generally immediately repackaged. Stored containers are routinely visually inspected.

The situations in which a spill could potentially occur on-site in increasing order of likelihood are

- 1) a total failure of a container structure leading to the emptying of one complete container,
- 2) the accidental dropping of a container whilst loading/unloading ie forklift incident resulting in 1 large to a number of smaller containers being accidentally dropped and rupturing or
- 3) an accidental spill during repackaging.

Taking into consideration each scenario:

1) The original inspection of the container as well as routine inspection of the Bins keeps this possibility to a bare minimum, given that a container is likely to leak before a complete structural failure. It is not envisaged that this might occur as a leaking container would either be replaced or placed entirely in a larger container such as an open leakproof skip lined with absorbent material or an open topped IBC (depending on size) to avoid spillage onto the floor.

2) During loading (for export) or unloading (for storage on-site) operations, containers on pallets are moved using a forklift. All forklift operators on-site are intensively trained due to the nature of the hazards involved, and only the most experienced operator is generally allocated duties involving movement of containers of hazardous liquid or sludge waste. Forklift operations are guided by personnel on the ground and overseen by the Site Manager, Operations Manager or a Director.

Containers of liquid waste on pallets may consist of one IBC or smaller drums, however the maximum volume per pallet is reached when 1 IBC is loaded as all other combinations (eg 4x 205L) consist of a smaller liquid volume. When multiple containers are loaded onto a pallet,

these are strapped together or shrink-wrapped, depending on their origin and destination. This prevents the possibility of movement and renders the structure more evenly balanced and stable. Multiple containers bundled together will contain the same material so that in the event of an accident, a spill will consist of only one type of material. The only exception to this is 'laboratory smalls' which may be mixed together in one open-topped IBC with all inter-container spaces filled with absorbent material and shrink-wrapped.

Should a forklift accident occur, the worst case scenario in terms of volume spillage would be 1000L of material.

All pallets used are inspected prior to usage to ensure they are structurally sound.

During these operations, a large leakproof skip lined with absorbent material should be kept at hand along with extra absorbent material. Should a container (or multiple containers) be dropped and broken, the entire structure should be picked up and deposited inside the skip which would automatically contain the spill and prevent further spillage to the ground. With an appropriate response time, it is therefore unlikely that even in this worst-case scenario type of spill, the entire volume contained in the structurally damaged container would be spilled.

IBCs, whilst constructed of plastic, are surrounded by a metal cage structure which, should the IBC be dropped, is the part of the structure that would strike the ground, thus lessening the likelihood of the plastic structure being extensively damaged. Smaller containers weigh less and the distance they are lifted off the ground is limited by the forklift structure. During movement, the forklift operator lowers the load to as close to the ground as possible in order to give the moving structure a lower centre of gravity, thereby removing the risk of toppling over and also reducing the risk of extensive damage should the load fall off, as it would only fall a very short distance to the ground.

3) Material may sometimes be repackaged, either because of faulty containers, or, more often, for bulking purposes i.e. in order to combine small, separately stored amounts of the same material into one larger container in order to optimize storage space and also for making transportation (export) more economically feasible. This is carried out in the hazardous storage area. The risk for spills in this scenario is more likely as more persons are involved in the handling of the material thus augmenting the risk of operator error. The spillage from this kind of operation however is more likely to be on a small scale and whilst it is in theory the most likely to occur, it is also the most easily contained. Absorbent material should be kept at hand at all times during repackaging and any small spills should immediately be covered, contained and collected.

All repackaging, loading and unloading operations of liquid hazardous waste take place in the loading bay adjacent to the storage Bins, which is floored with an impermeable flooring just like the inside of the bin. A channel which runs the entire length of the storage area leading to a holding reservoir is in place to collect material should any potential spill occur which is not speedily contained.

Drain blockers and bunding strips should be kept on hand during any operation which could potentially result in a spill.

Spill containment and collection

In all cases involving a spill, drain blockers are to be placed above drain covers to avoid the possibility of contaminating the contents of the water reservoirs. Bunding strips may also be used to restrict any spills from spreading.

In case of a small scale spill where the containers are still intact, (eg during repackaging) absorbent material should be thrown onto the spill, left to absorb the liquid and then swept up and collected into an appropriate container. The spill cleanup debris should be stored and treated as hazardous waste.

In the case of a larger, spreading spill, absorbent material should be used to surround the perimeter of the spill in order to contain the spreading. Once this is in place the centre of the spill should then be covered in order to absorb the bulk of the material. Once all of the spill is absorbed, the absorbent material should be swept and collected into an appropriate container and stored and treated as hazardous waste.

Should a container break through accidental dropping during a forklift operation, this should be speedily collected and placed inside an open topped leakproof skip lined with absorbent material in order to minimize the spill volume. Once the source of the spill is contained, the spill should be treated as described above.

The same cleaning operation applies to any breakages of neon tubes, that generally result in fine glass. This is collected as above. Material to be disposed of together with the rest of the neon tubes.

All cleaning materials (brooms, shovels etc) should always be kept close at hand during operations which could result in potential spillage. Should it be necessary, extra staff members may be mobilised to aid in the cleanup process.

Since all the floor areas involved are impermeable, it is not envisaged that a potential spill could reach the ground or groundwater. There are no natural surface waterways in the vicinity. The only off-site effect a spill could possibly have would be emissions in the case of a volatile substance being spilled, however due to the fact that all operations which could result in a potential large spill necessarily take place outdoors or in the open-faced buildings, there is no way in which these could be contained.

Responsibility Allocation

It is the Directors' responsibility to ensure that all staff handling liquid waste are appropriately trained in handling the waste in a way which minimizes risk (eg forklift should always be driven

with loads lowered) and in detecting situations which may possibly lead to accidents. Each operation which entails a spill risk (repackaging/loading/unloading) should be planned and allocated a time slot and trained personnel. Each team should include a more senior person who

is responsible for the actual carrying out of the operation. The logistics of each operation should be planned ahead and coordinated with the site manager.

All personnel working on operations which entail a potential spill risk should be trained in spill cleanup procedures.

The Site Manager and the Operations Manager are responsible for coordinating the cleanup operation. All situations which could result in potential spills should always be allocated a timeslot when at least one of the two is present on-site.

Communications

An effective communications system is essential for dealing with potential spills and all staff are made aware of their individual responsibilities pertaining to a spill situation.

Backup resources

Should an emergency arise, backup resources should be readily available to all employees dealing with the spill containment and cleanup operation. Personal protective gear is worn at all times during repackaging operations and available at hand at all other times. Absorbent material is readily available throughout the storage area as well as leakproof waste containment skips.

Test emergency procedures

The SERP should be periodically tested to ensure the staff is appropriately prepared, and response procedures work in an adequate and timely manner. Changes to the SERP should be implemented if procedures can be improved. Tests can include incident simulation exercises, evacuations, testing communication systems and team training.

Notification of authorities

The CPD and MEPA shall be notified in the case of any spill which extends beyond the site boundary or consists of such a volume that it could potentially do so.

Evacuation

Should a situation arise where it is deemed that people's health or well-being may be at risk, evacuation of all personnel not directly involved in the cleanup operation should be carried out. This is very unlikely to happen, since all operations which may result in spillage, as previously described, are restricted to a specific area on-site.

Incident Investigation

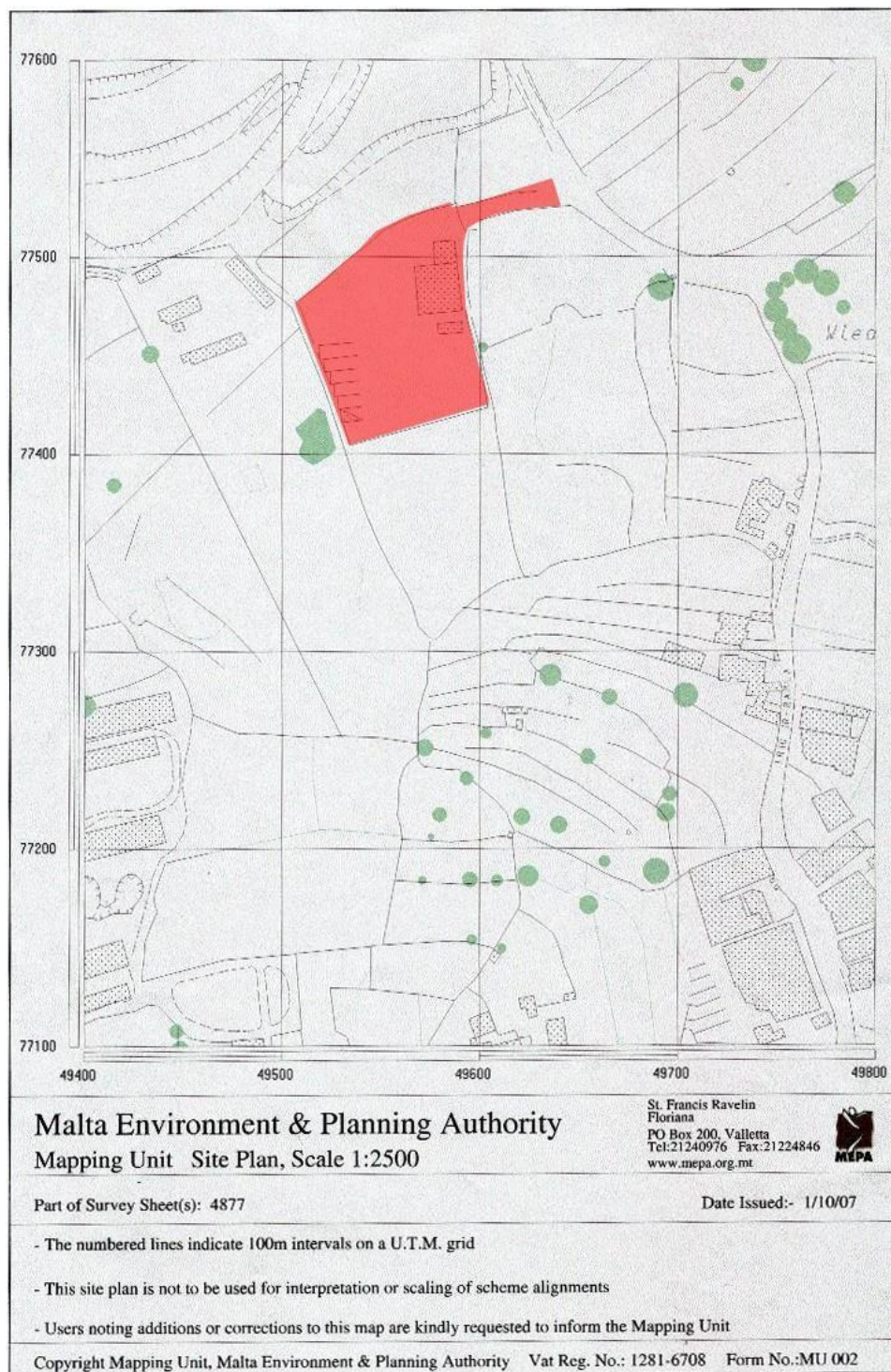
Both actual incidents and near misses should always be reported to the Site Manager who, in turn, should report to the Directors. Should any accident or near miss be the result of

inappropriate procedures or logistics, these should be reviewed and changes implemented as soon as possible.

Key Personnel/ Authorities Contact Details

Name	Role	Contact Number
SITE MANAGER	Site Manager	99500618
HEAD OF OPERATIONS	Operations	99422545
Doris Sammut Bonnici	Director	99422543
Mary Gaerty	Director	99422544
Ondine Gaerty	Chemist	99428242
CPD HazMat Unit		112
Ambulance Services		112
ERA	Authority	2292 3500

Annex A – Site Plan



ANNEX B

SPILL EMERGENCY RESPONSE PLAN – AUTHORITY NOTIFICATION FORM – Page 1/2

Name, address, and telephone number of the person reporting and the responsible party;	GREEN SKIP SERVICES Ltd, Ramla Road, Maghtab Person currently responsible on-site: Name: Role: Mobile : Landline: 21422009 21422010
Date and time the incident occurred or was discovered;	
Name of the chemical/material released	
Source and cause of the release: A brief description of the incident which led to the spill (if known)	
Total quantity discharged	
Owner (company/individual) of spilled material	
Weather conditions	
Name of the carrier, truck number, or other identifying information; Any vehicles involved in the spill should be listed, including any 3 rd party owned ones	
Number and type of injuries	
Evacuation carried out (Y/N)	
Description of current and future cleanup actions	
Agencies requiring notification	MEPA : 22900000 CPD (ask for HazMat unit): 112

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SPILL EMERGENCY RESPONSE PLAN – AUTHORITY NOTIFICATION FORM – Page 2/2

MARK EXACT LOCATION OF ORIGINAL SPILL

