# Internal Spill Reporting SOP

#### 1 Purpose and Scope

This Standard Operating Procedure (SOP) describes the proper procedures for reporting spills internally to the Environmental Department. Proper spill reporting is required to meet regulatory and Teck Alaska requirements for spill notifications.

#### 2 Procedure

#### 2.1 Environmental Department – Spill Reporting Office

The Spill Reporting Officer (SRO), or the designated SRO, will be responsible for making all outside agency and non-agency notifications for Teck Alaska related spills. Contractors please refer to the <u>Spill Reporting Instructions for Contractors</u> for required internal notification requirements.

#### 2.2 Spill Notification

Supervisors, instruct your team that any and all spills must be reported immediately to you. Supervisors are then responsible for reporting spills to the Spill Reporting Officer in the Environmental Department as described below. Supervisors must follow guidelines and timeline for reporting, below:

1. Report all spills immediately (see Section 2.3 for exceptions)

# Contact the Spill Reporting Officer by calling the Spill Reporting telephone number at 754-5367, or extension 45367.

- If there is no answer at this number, contact the Control Room at 45222, 911, or if you don't have access to a phone, use Radio Channel 4.
- Control Room Personnel will contact the on call Spill Reporting Officer.
- You must speak to the Spill Reporting Officer. Email or voice messages do not satisfy this notification requirement. In the event the Spill Reporting Officer cannot be reached, notification can be made to an Environmental Coordinator.

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- 2. When reporting a spill, provide the following information:
  - Name and telephone number
  - Date and time of spill
  - Details of spill
  - Substance spilled
  - Quantity spilled
  - Location of spill
  - Cause of spill
  - Actions being taken to stop and contain the spill
  - Where will contaminated substances be placed
  - How will contaminated clean up materials be disposed
  - Equipment Unit #
  - Maintenance Work Order # (if applicable);
  - Type of System (i.e. hoist, steering, brake);
  - Type of failure such as hose failure, hardline failure, seals, or fittings.

If you do not have all of the information listed above, then report all information that is available to you at the time; however, information gaps must be filled in later. In any event, <u>do not delay reporting to the Spill Reporting Officer</u>.

#### 2.3 Exceptions - Report Certain Spills by End of Shift

Report the following oil, petroleum, or glycol spills by the end of the shift in which they occurred:

- Less than 55 gallons oil, petroleum or glycol to ground/gravel (any spills to tundra, water, or on the Port Haul Road within the Park Boundary must be reported immediately);
- Any amount of oil, petroleum or glycol to secondary containment i.e., bermed/walled impermeable containment structures, or tanks with double-walled containment.
- Call the Spill Reporting Office, as described above in Section 2.2

The above are regarding only oil, petroleum or glycol spills to ground/gravel or secondary containment only – NOTE that any spill of any substance to water, tundra, or National Park (Cape Krusenstern) land is immediately reportable.

## 2.4 Spill Reports

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Spill reports are completed by entering a new Supervisor's Investigation Report (SIR) into SiteLine.

- 1. This is very important: *do not delay* submitting the spill report even if you do not have all the required information to immediately complete the report.
- 2. The Spill Reporting Officer or their designee is responsible for ensuring copies of spill reports are provided to agencies or other groups as required.

# 3 Key Responsibilities

<u>Supervisor</u>: Responsible for completing incident reports and reporting spills to the Spill Reporting Officer.

<u>Contractors</u>: NANA/Lynden is responsible for reporting spills to regulatory agencies and other parties. All other contractors follow the procedures in 2.1.5 above.

<u>Spill Reporting Officer</u>: Responsible for reporting spills to regulatory agencies and other parties. The Spill Reporting Officer will assign a designated Reporting Officer when he is off-site.

## 4 Departure from Procedure

This SOP was written to comply with applicable laws and regulations pertaining to spill notifications. Failure to follow this procedure could result in consequences to health and safety and/or the environment. Departure from procedures resulting in pollution may also lead to criminal or civil penalties for you and the Company as well as adverse affects on corporate performance and reputation.

#### 5 Definitions

<u>Spill Reporting Officer</u>: A position held by an Environmental Coordinator or Environmental Technical Supervisor within the Environmental Department.

## 6 General Requirements

18 AAC 75: ADEC reporting

40 CFR 110: Oil Spill Reporting

40 CFR 112: Clean Air Act

40 CFR 117: Clean Water Act Reporting

40 CFR 302: CERCLA reporting

ISO 14001 – 4.4.6 Operational Control

## 7 Key Documents/Tools/References

Spill Reporting Instructions for Contractors

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