IMAGE RESOURCES	**Hydrocarbon and Spill Management Procedure**	**Document #**	ATL-ENV-PRO-002
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Atlas Operations			

1. PURPOSE

The purpose of this procedure is to ensure the management of hydrocarbons and spills that have or could have the potential to impact the environment. Hydrocarbon and chemical spills can have severe environmental impacts. They can contaminate soil and water sources, harming local ecosystems and wildlife. All hydrocarbon and spill management are in accordance with legal requirements.

2. SCOPE

This procedure applies to the Atlas Project, including:

- Employees;
- Contractors and sub-contractors;
- Consultants and
- Visitors.

All personnel are required to report environmental incidents and hazards including hydrocarbon spills as per induction requirements that are on the Atlas Project mining tenure.

3. ACCOUNTABILITIES

The following people have accountabilities under this Procedure:

Role	Accountabilities
Operations Manager	• Ensure this procedure is implemented, maintained and communicated
Area Manager/ Supervisor	• Ensure that hydrocarbons are transported, stored, handled, used and disposed of in compliance with this procedure • Ensure all spills in area of responsibility are reported using a Spill Card • Undertake inspections to check hydrocarbon management
Senior Environmental Advisor / Environmental Advisor	• Communicate hydrocarbon spill reporting requirements • Undertake inspections to check hydrocarbon management • Review Spill Cards and where required request additional information/investigation based on significance • Enter hydrocarbon spills as an incident to Lucidity when required • Undertake external reporting of significant spills to government agencies, as required • Ensure all actions are completed from investigations
All personnel	• Prevent/minimise spills so probability of a spill is as low as reasonably practicable (ALARP) • Assess the spill, Control, Contain and Clean up spills where safe to do so • Use spill kits if a spill occurs • Use Spill Cards to report any and all spills

Role	Accountabilities
	• Fill in Spill Card and hand to Supervisor • Clean up spill and dispose of hydrocarbon contaminated waste appropriately • Implement follow up actions from incident investigations

4. PROCESS

4.1. Prevention

Appropriate controls need to be put in place when transporting, storing, handling, using and disposing of hydrocarbons to ensure the likelihood of a spill and potential environmental impact is minimised.

This includes the use of drip trays and spill kits when transferring hydrocarbons.

Environmentally hazardous chemicals including fuel, oil or other hydrocarbons (where the total volume of each substance stored on the premises exceeds 250 litres) shall be stored within bunds. These bunds must be:

- low permeability (10-9 metres per second or less) compound(s)
- be chemically resistant to the substances stored
- designed to contain not less than 110% of the volume of the largest storage vessel or inter-connected system, and
- designed to contain at least 25% of the total volume of substances stored in the compound.

For bulk hydrocarbon storage facility bunds these shall be:

- graded or include a sump to allow recovery of liquid;
- include valves, pumps and meters associated with transfer operations wherever practical;
- adequately protected (e.g. bollards) and contained in an area designed to permit recovery of chemicals;
- designed such that jetting from any storage vessel or fitting will be captured within the bunded area in accordance with Australian Standard 1940-2017;
- (v) be designed such that chemicals which may react dangerously if they come into contact, are in separate bunds in the same compound or in different compounds; and
- (vi) be controlled such that the capacity of the bund is maintained at all times (e.g. regular inspection and pumping out of trapped uncontaminated rain water).

Any liquid resulting from spills or leaks of chemicals shall be immediately recovered, or removed and disposed of, including fuel, oil or other hydrocarbons, whether inside or outside the bunds.

Workshop, washdown and any other areas which produce waste hydrocarbons shall include appropriate waste hydrocarbon facilities e.g. Waste oil tanks/bulk containers; oil water separators etc to prevent hydrocarbon contaminated water being discharged to the environment.

Spill response

4.1.1. Assess the Spill

If a spill has occurred, the first step to be taken is to assess the situation to determine the:

- Type of substance
- Source of the spill and whether it can be isolated
- Ability of personnel to control the spill
- Safety and PPE requirements (refer to MSDS)

4.1.2. Emergency Response

If the spill is assessed to be an emergency, then it shall be declared by following site emergency notification communications and acted upon in accordance with the site Emergency Response Plan (HST-PLA-003).

In the event of a very large/significant spill requiring emergency response, personnel working in or near the area shall be notified of the spill occurrence, evacuated if required and the area should be safely secured by coning off or erecting barricading around the spill area to prevent personnel from accessing the area unnecessarily.

4.1.3. Control the Spill

In the event of a spill involving the release of a type or quantity of a chemical which does not pose an immediate risk to health or safety of personnel, immediate action shall be taken to control the spill at the source. Eg. Plug the hole in the drum; switch off the machine; etc

The source of the spill should be isolated to prevent the spill from becoming larger. The spill should be contained by appropriate means which may include constructing an earthen bund or by surrounding the spill with the appropriate absorbent booms.

4.1.4. Contain the Spill

Spills should be contained by means of absorption, converting a liquid spill into a solid enabling clean up. Hydrocarbon and general-purpose spill kits are available at appropriate locations. A range of absorbent materials are supplied in the spill kits including absorbent booms, absorbent pads, granular absorbents, disposable bags and ties. For large spills it may be appropriate to use sand to soak up the spill. The containment of the spill is imperative to prevent runoff into sump, natural drainage lines and into vegetation.

4.1.5. Clean Up the Spill

The method of clean-up is dependent upon the location, nature and extent of the spill and may include:

- On concrete - Use absorbent pads or granules to soak up the liquid. Dispose of the used granules and absorbent pads in hydrocarbon waste bins.
- On soil – Collect impacted soil and remove to the bioremediation facility or hydrocarbon contaminated bin. Advise the Environmental Team immediately if potential for spill to impact fauna and put in place controls to minimise impact (ie cover with soil).
- In water - Reduce the area affected by using hydrocarbon booms. Use absorbent pads to soak up as much of the liquid as possible. Advise the Environmental Department if potential for spill to impact natural drainage lines/waterways.
- Within Bunds – Recover large spills by pumping into other vessels. Dispose of waste liquid with waste oil. Recover small spills by using absorbent pads. Hydrocarbon contaminated water in bunds needs to be pumped to treatment facility.

Figure 1 below shows how a spill can control and contained. The source of the spill is controlled where possible. This can be achieved by sealing the leak from the container where the hydrocarbon is coming from eg. Vehicle oil sump. The spill is then contained by surrounding it with contaminant booms. Absorbent material should then be added to the spill to convert the spill from liquid to solid allowing an easier cleanup.

All materials used to clean up a spill and contaminated soils must be disposed of appropriately. Used absorbent material which is non-biodegradable needs to be placed in the hydrocarbon bin for offsite disposal. Chemical (non-hydrocarbon) contaminated waste must be sent offsite for disposal.

4.2. Reporting

4.2.1. Internal

All releases of hydrocarbons must be reported on a Spill Card (ATL-ENV-FOR-002). All spill cards will be reviewed by the Environmental Department and entered into the Image incident reporting system Lucidity. If a spill is considered significant (i.e. due to volume or location) then a full incident report and

investigation will be required. The Senior Environmental Advisor will advise the Area Manager/ Superintendent if a spill reported via Spill Card requires a full investigation.

4.2.2. External

All environmental incidents including spills will be recorded and a summary provided to government departments via annual reports.

External reporting is undertaken by Image Resources Snr Environmental Advisor or Operations Manager (or Delegate), if required as per the below guidance:

DWER:

- Under Section 72 of the Environmental Protection Act 1986, companies must report discharges of waste that have caused or are likely to cause Pollution, Material or Serious Environmental Harm, as soon as practicable.
- The occupier is required to make preliminary notification of the discharge as soon as practicable to the CEO of Department of Water and Environmental Regulation (DWER) by calling the Pollution Watch Hotline (1300 784 782).
- A Waste discharge notification form is then to be completed, with a map of the discharge point and sent via email (pollutionwatch@dwer.wa.gov.au). For more information see

DEMIRS:

Department of Energy Mines, Industry Regulation and Safety (DEMIRS) must be notified of any incident that breaches any environmental outcome or performance criteria of the approved Mining Proposal; or any incident arising from mining activities that has caused, or has the potential to cause environmental harm or injury to land. Notification via 08 9222 3333 or incidents.environment@dmirs.wa.gov.au.

All tenements are subject to a standard condition requiring tenement holders to notify DEMIRS of any reportable environmental incidents within twenty-four hours of detection. Failure to notify DMIRS of a reportable incident would be a breach of condition and the mining tenements would potentially be subject to forfeiture action under the Mining Act.

Following the initial notification, DMIRS will require an investigation report to be provided within a timeframe agreed with the department. The timeframe in which an investigation report is required to be submitted will be determined on a case-by-case basis depending on the nature of the incident.

The report will outline the details of the incident, explaining how it occurred, the impacts on the environment and any remedial actions taken. If not a reportable environmental incident, tenement holders should report all non-compliances to DMIRS within three days of identification. For more information see

RELATED DOCUMENTS

Legislation
Mining Act 1978
Environment Protection Act 1986
Image Resources Documents
ENV-FOR-002 Spill Card
External Documents (Click the link below)
Duty to notify discharges of waste (DWER)
Guidance Note on Environmental Non-compliance and Incident Reporting (DMIRS)