



Spill Kits and Incidental Spill Response

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**What is the difference
between an incidental spill
and an emergency spill?**

Incidental or emergency?

“The quantity of product spilled does not by itself determine if an incidental spill has occurred. Several variables, including the volume of the spill, must be considered ... Examples of other variables include the type of material spilled and the location of the spill.”



OSHA interpretation letter

July 31, 1990

Incidental or emergency?

An incidental release:

- Does not pose a significant safety or health hazard to employees in the immediate vicinity or to the employee cleaning it up
- Does not have the potential to become an emergency within a short time
- Is limited in quantity, exposure potential or toxicity



Incidental or emergency?

According to an OSHA interpretation letter, for the definition of “emergency response” to be satisfied, the release or situation must pose an emergency.



Incidental or emergency?

Examples of an emergency include:

- It may cause high levels of exposures to toxic substances
- It is life or injury threatening
- Employees must evacuate the area
- It poses Immediately Dangerous to Life and Health (IDLH) conditions
- It poses a fire and explosion hazard
- It requires immediate attention because of danger
- It represents an oxygen deficient condition



Incidental or emergency?

Consider:

- The properties of hazardous substances onsite, such as toxicity, volatility, flammability, explosiveness, corrosiveness, etc.
- The particular circumstances of the release itself, such as volume spilled, confined space considerations, ventilation, etc.
- Employees' level of knowledge
- Personal protective equipment (PPE) available



Incidental or emergency?

There is no “one-size-fits all” answer to whether a spill is incidental or an emergency release.

- The answer is facility and spill-specific



Being Prepared



Preparing for the not-so-worst

Many regulations require facilities to prepare for the “worst-case scenario” spill.

While this is important; according to the National Response Center, most spills in fixed facilities are less than 10 gallons, making response to incidental spills an important consideration.



Preparing for the not-so-worst

Employees who are trained to clean up incidental spills have the ability to:

- Safely and efficiently clean up incidental spills
- Keep the workplace cleaner and safer
- Minimize slip and fall incidents
- Quickly recognize spill hazards that are beyond the scope of their training



Response Basics



Before a spill happens...

All employees need to be trained on their specific roles and responsibilities for spills.

- Even if the only action an employee will take is to evacuate the area, response plans need to state this
- Plans should also establish exit routes and list the location that employees should report to after evacuating

Learning the rules

Because the type of liquid spilled and its quantity play a role in spill response, facility response plans should provide guidance on what is considered to be “incidental” at your facility, and what defines an “emergency response.”



Learning the rules

There may be different rules for different types of chemical spills within the facility. Example:

- Clean up a 20-gallon oil spill
- Sound an alarm and evacuate the facility for any ammonia spill





Learning the rules

Employees who will be involved in responding to emergency releases must be properly trained to the criteria in OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) regulation [29 CFR 1910.120].

- Incidental spill response is not covered under the HAZWOPER standard



Steps for Incidental Spill Response



1. Determine the scope

Does the spill meet your facility's definition of "incidental"?

- If it does not, follow your facility's procedures for evacuating the area and notifying trained spill responders
- If you are not sure, ask a supervisor



2. Safety first

Life safety is always the top priority in spill situations.

- If it is not safe for you to remain in the area to clean up a spill, the spill may no longer be “incidental”
- Do not enter a spill area to help victims. Notify trained responders who will be able to do this safely

3. Inform and block

- Notify your supervisor and coworkers in the area of the spill to help avoid slip and fall or other injuries
- Limit or stop foot, cart, forklift or other traffic through the spill area



4. Protect yourself

Don the proper personal protective equipment (PPE) before cleaning up a spill. Proper PPE may be:

- What you normally wear
- Specialized clothing or protective gear
- Check Safety Data Sheets (SDS) or the facility response plan to be sure



5. Use appropriate spill response materials

Before a spill, learn how to use the spill response materials available at the facility. Spill response materials can include items such as:

- Absorbent mats and socks
- Shovels, brooms or other tools
- Vacuums
- Neutralizers
- Temporary disposal bags and labels

6. Decontaminate

After the spill is cleaned up, decontaminate the floor, tools and any other surfaces that were exposed to the spill.



7. Bag or containerize wastes

- Clean up used spill response materials
- Properly label disposal bags or containers or ask your supervisor for the appropriate actions to be taken



8. Restock

Restock or replace items used during the spill response so that materials will be ready for the next incident





What items should be included in a spill kit?

Spill Kits

Although OSHA and EPA require facilities to be prepared for spills, neither has a comprehensive list of required spill response materials.

- Spill kits are a convenient way to be prepared for spills and comply with various regulations



Spill Kits

Because spills and levels of training vary, it is the employer's responsibility to determine which materials and tools will work best for their possible scenarios.

Many responders use a variety of materials and techniques such as:

- Absorbents
- Vacuums
- Dikes
- Neutralizing

Spill Kits

Spill kits traditionally contain some or all of the following items:

- Absorbent socks and mats
- Loose absorbents
- Temporary disposal bags
- Plugs, repair items and tools
- Basic PPE



Spill Kits

When selecting absorbents, make sure that they will be compatible with the liquids spilled.

In general:

- Cellulose-based absorbents are good for noncorrosive spills
- Polypropylene or other “inert” materials are necessary for corrosive spills
- Absorbents do not neutralize a spill or make it less hazardous



Spill Kits

Spill response items can be housed in cabinets, placed on shelving, stored in plastic containers or bags or kept in cardboard boxes.

No matter what type of container is used, it is critical for workers to easily find and access the materials in the spill kit when they are needed.

Spill Kits

Personal Protective Equipment (PPE) is often stored with spill response supplies to help ensure that employees have the proper protection when responding to a spill.

PPE for incidental spills may be as simple as a pair of goggles and gloves.

Check Safety Data Sheets (SDS) for guidance.



Spill Kits

Response tools can be stored in or near a spill kit. Common tools include:

- Brooms, dustpans and shovels
- Vacuums
- Drain covers
- Nonabsorbent containment dikes
- Plugs and other patch and repair items
- Wrenches, hammers or other hand tools

Spill Kits

If you are creating your own spill kit for incidental spills, be sure to pack it in the order the materials will be used:

- Disposal bags on the bottom
- Absorbent mats next
- Absorbent socks on top of the mats
- PPE on top





Spill Kits

Spill kits for larger spills are packed similarly to small spill kits.

- Keep PPE on top
- Consider bins or bags for absorbents and tools so they can be removed easily without dumping the whole kit onto the ground to find materials that are needed

Stocking Materials

Spill response materials and tools should be easy to find and access.

Consider:

- Brightly colored kit containers or labels
- Using signs to identify kit locations
- Placing several small kits throughout the facility in spill-prone areas such as fluid dispensing areas, production lines and waste collection stations



Thank You