

Oil Management

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1 Documentation Scope

To define the key requirements for the management of oil and out-of-service oil-filled equipment, including licensing, storage, transport and assurance processes and management of Oily Water Separators.

This Standard applies to all Endeavour Energy workers and Accredited Service Providers (ASPs), but does not address the following:

- in-service oil-filled equipment (refer to Substation Design Instruction SDI540 – Transformer Oil Containment)
- analytical testing and disposal of oil, oily water or oil-filled equipment (refer to Environmental Management Standard EMS 0007 – Waste Management); and
- leaks or spills of oil (refer to Environmental Management Standard EMS 0008 – Environmental Incident Response and Management).

2 References

External Regulations	
Electricity Supply Act 1995 (NSW)	
Australian Code for the Transport of Dangerous Goods by Road and Rail (7th Edition June 2016)	
Electricity Supply (Safety and Network Management) Regulation 2014 (NSW)	
Environment Protection Council (NSW) Act 1995	
Environmentally Hazardous Chemicals (EHC) Act 1985 (NSW)	
Environmentally Hazardous Chemicals Regulation 2017 (NSW)	
Identification of PCB Containing Capacitors – Australian and New Zealand Environment and Conservation Council 1997 (ANZECC)	
Local Government Act 1993	
Polychlorinated Biphenyl (PCB) Chemical Control Order 1997	
Protection of the Environment Operations (POEO) Act 1997 (NSW)	
Protection of the Environment Operations (Waste) Regulation 2005 (NSW)	
Scheduled Chemical Wastes Chemical Control Order (CCO) 2004 (NSW EPA)	
Work Health and Safety (WHS) Regulation 2017 (NSW)	

Standard No.	Title
AS 5577	Electricity Network Safety Management Systems
AS 1940-2004	The storage and handling of flammable and combustible liquids

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Company Policies and Procedures
Board Policy (Environment) 4.0 – Environmental Sustainability Policy
Company Procedure (Environment) GPE 0013 – Monitoring, Measurement, Analysis and Continual Improvement of Environmental Performance
Company Procedure (Health & Safety) GSY 0025 – Safety and Environment Audit
Company Procedure (Health & Safety) GSY 051 – HSE Incident Learning & Reporting
Company Procedure (Health & Safety) GSY 1066 – Worksite Hazard and Risk Assessment
Company Form (Health & Safety) FSY 0118 – Worksite Coordination / Hazard & Risk Assessment
Division Procedure (Network) GNV 1087 – Over Height Loads Transported within the company's Franchise Area
Division Workplace Instruction (Network) WNV 1016 – Preparation and Disposal of Surplus Oil Filled Distribution Electrical Equipment
HSE Quick Guide – Transporting oil filled transformers from the field to the FSC

Company Standards
Environmental Management Standard EMS 0007 – Waste Management
Environmental Management Standard EMS 0008 – Environmental Incident Response and Management
Substation Design Instruction SDI 540 – Transformer Oil Containment
Substation Maintenance Instruction SMI 115 – Oil Water Separators and Bunds
Substation Maintenance Instruction SMI 121 – Storage and Handling of Insulating Oil
Electricity Network Safety Management System
Environmental Guidelines Handbook

3 Definitions and Abbreviations

Term	Definition
ASP	Accredited Service Provider
CCO	Chemical Control Order
EHC	Environmentally Hazardous Chemicals
EMS	Environmental Management Standard
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
FSC	Field Service Centre
POEO	Protection of the Environment Operations Act
PCB	Polychlorinated Biphenyl
SDS	Safety Data Sheet
SDI	Substation Design Instruction
SEPP	Infrastructure State Environmental Planning Policy (Infrastructure) 2007
SMI	Substation Maintenance Instruction
ASP	Accredited Service Provider
WHS	Work Health and Safety
WHRA	Worksite Hazard and Risk Assessment
Accredited Service Provider (ASP)	A person with accreditation under Part 3 of the <i>Electricity Supply (Safety and Network Management) Regulation 2014 (NSW)</i> categorised into Levels 1, 2 and 3 as defined by the Department of Industry Resources & Energy under the Accredited Service Provider (ASP) Scheme for contestable works. An ASP is allowed to perform work on behalf of an Authorised Network Operator (ANO) where the ANO is the Determining Authority for that work, as prescribed by Section 110(1) of the <i>Environmental Planning and Assessment Act 1979</i> .
Bund	An impervious wall of brick, stone, concrete or other suitable material, which forms part or the entire perimeter of a compound that provides a secondary containment barrier to retain liquid. A permanent bund consists of: an impervious bund wall or embankment surrounding the facility or tanks; an impervious floor within the banded area; any joints in the floor or the wall, or between the floor and the wall; and any associated facilities designed to remove liquids safely from the banded area without polluting the environment.
Chemical Control Order (CCO)	An order made and enforced by the NSW EPA for the control of specific environmentally hazardous and declared chemical wastes under sections 22 and 23 of the <i>EHC Act 1985 (NSW)</i> .
Contract	An agreement between the business and a contractor engaged by the business for defined services.
Consignment authorisation (CA)	The approval provided by the EPA or EPA licensed waste facility for the movement of controlled/trackable wastes (generally provided as a CA number). A CA can be provided for up to one year and contains the waste form and waste code from the characterisation/classification of waste. It is a legal requirement for a CA to be issued before waste which must be tracked can be transported.
Dangerous goods	Dangerous goods are substances, mixtures or articles that, because of their physical, chemical (physicochemical) or acute toxicity properties, present an

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	immediate hazard to people, property or the environment. Types of substances classified as dangerous goods include explosives, flammable liquids and gases, corrosives, chemically reactive or acutely (highly) toxic substances. They are classified as per the <i>Australian Code for the Transport of Dangerous Goods by Road and Rail</i> and include some Hazardous Chemicals defined under the <i>WHS Regulation 2017 (NSW)</i> .
Emergency situation	In accordance with SEPP (Infrastructure) 2007, works for the purpose of maintaining or restoring infrastructure facilities or equipment in order to maintain public safety or to protect buildings or the environment due to: • a sudden natural event, including a storm, flood, tree fall, bushfire, land slip or coastal inundation • accident, equipment failure or structural collapse; or • damage caused by vandalism or arson.
Environment Protection Authority (EPA)	NSW EPA regulates waste management and resource recovery programs within NSW
Environmental Product Declaration	Product specific environmental information that details the life cycle assessment of that product.
Environmentally Hazardous Chemicals (EHC)	A chemical (other than a declared chemical waste) the subject of a chemical control order.
Environmentally sensitive area	Includes but is not limited to, a water catchment area, reservoir for drinking water, freshwater or marine environment and national park or equivalent.
Ignition source	A source of energy sufficient to ignite a flammable atmosphere.
Local authority	A council as the meaning in the <i>Local Government Act 1993</i> .
Licence	Means an environment protection license (EPL) as granted under the <i>POEO Act 1997</i> , or an EHC License as granted under the <i>EHC Act 1985</i>
Life Cycle Assessment	A cradle to grave analysis of environmental impacts of a product considering raw materials, manufacturing/production process, use, re-use potential and end of life options (e.g. recovering, recycling and disposal).
National Environment Protection Measure (NEPM)	A broad framework-setting statutory instrument made under National <i>Environment Protection Council (NSW) Act 1995</i> . Consisting of any combination of goals, standards, protocols or guidelines, a NEPM defines agreed national objectives for protecting or managing particular aspects of the environment.
Non-scheduled PCB containing material	Articles, containers, equipment, oils and other substances containing PCBs at concentration levels greater than 2 mg/kg but below 50 mg/kg.
Non-scheduled PCB oil	Oil containing PCB at a concentration greater than 2ppm (or mg/kg) and less than 50ppm (or mg/kg).
Non-scheduled PCB waste	PCB waste containing PCB as a concentration greater than 2ppm (or mg/kg) and less than 50ppm (or mg/kg).
Oil container	Containment device for the storage of oil. Includes, among others, 205 L drums and palecons.
Oil-filled equipment	All electrical equipment that contains insulating oil.
PCB Chemical Control Order	An order in force under section 22 or 23 of the <i>EHC Act 1985</i> and are used to manage chemicals and chemical wastes that require additional controls beyond

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	those set under current pollution laws to limit their potential or actual impact on the environment.
PCB containing material	Articles, containers, equipment, oils and other substances containing PCBs at concentration levels greater than 2 mg/kg. This includes both scheduled and non-scheduled PCB containing material.
PCB containing oil	Oil containing PCB at a concentration greater than 2 mg/kg. This includes both scheduled and non-scheduled PCB containing oil.
PCB free materials	Articles, containers, equipment, oils and other substances containing PCB at a concentration less than 2 mg/kg.
PCB free oil	Oil containing PCB at a concentration less than 2 mg/kg.
Polychlorinated Biphenyl (PCB)	A viscous, odourless, tasteless and clear to pale yellow chemical substance which was historically used as an insulating medium in electrical equipment as well as in hydraulic and cooling fluids. PCBs are associated with a number of trade names in Australia including Askarels, Aroclor, Cloresil, Pyranol, Pyralene and Pyrochlor. PCBs may also be found in capacitors in ceiling fans, fluorescent lights, dish washers, air conditioners, washing machines and clothes dryers. A list of capacitors containing PCBs can be found in Identification of PCB Containing Capacitors, <i>Australian and New Zealand Environment and Conservation Council 1997 (ANZECC)</i> .
Portable bund	A removable temporary bund that is made of chemically resistant material and designed to retain any leaks from stored materials. Includes bundled pallets.
Process owner/manager	The employee assigned with the authority and accountability to manage the waste stream. The process owner/manager is the primary overseer for the waste stream.
Protected place	A dwelling, residential building, place of worship, public building, school or college, hospital, theatre and any building or open area in which persons are accustomed to assembling whether it is within or outside the property boundary of the installation. A factory, workshop office, store, warehouse, shop or building where persons are employed that is outside the boundary of the installation.
Scheduled chemical waste	Any waste liquid, sludge or solid (including waste articles and containers) which contain one or more of the constituents listed in <i>Schedule A</i> of the <i>Scheduled Chemical Wastes Chemical Control Order 2004</i> at a concentration of more than 2 ppm (or mg/kg)
Scheduled PCB Oil	Oil containing PCB at a concentration equal to or greater than 50 ppm (or mg/kg).
Scheduled PCB materials	Articles, containers, equipment, oils and other substances containing PCB at a concentration greater than 50 mg/kg.
Scheduled PCB waste	PCB waste that contain PCB at concentrations equal to or greater than 50 ppm (or mg/kg).
Worker	A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as: (a) an employee; or (b) a contractor or subcontractor; or (c) an employee of a contractor or subcontractor; or (d) an employee of a labour hire company who has been assigned to work in the person's business or undertaking; or (e) an outworker, i.e. a person who performs work for an employer at their own home or at another location that is separate from their employer's factory, workshop, office or worksite; or (f) an apprentice or trainee; or (g) a student gaining work experience; or

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Term	Definition
	(h) a volunteer.
Worksite Hazard and Risk Assessment (WHRA)	An assessment covering worksite conditions and potential health, safety and environmental hazards that are identified prior to the commencement of work. These hazards are then assessed for severity and control measures are identified and implemented.

4 Technical Requirements

4.1 Polychlorinated Biphenyls (PCBs)

PCBs are progressively being removed from the network through oil replacement and refurbishment programs. Remaining PCBs are typically found at very low levels (less than 15ppm). It is noted that oil replacement programs do not result in the complete removal of PCBs from contaminated electrical equipment; PCB free oil may become contaminated (at lower concentrations) following the release of PCBs from the internal surfaces and windings.

The business has data for the PCB concentrations in power transformers. **Riverstone Zone Substation** is the only substation site where there are power transformers containing scheduled PCB containing oil. As such, the business is required to have an Environment Protection Licence for this premises.

There are several substation sites where there are power transformers containing non – scheduled PCB containing oil. All power transformers that contain scheduled or non-scheduled PCB containing oil will be **labelled as “PCB containing oil”**. Advice must be sought from the Operations Division on the status of PCBs in such equipment.

Other electrical equipment that was manufactured prior to 1991 and is not designated “PCB free” on the nameplate will be assumed to contain PCB materials. Sealed electrical equipment, manufactured prior to 1991 and not readily accessible for sampling via drains or removable access panels, must not be breached for the purposes of sampling. This equipment must be assumed to contain PCB materials and managed in accordance with the requirements of this Standard.

4.1.1 Safety hazards and controls

PCBs enter the body through skin contact, inhalation of vapours and swallowing contaminated food or drink. Repeated or prolonged exposure may cause acne-like skin conditions, respiratory tract symptoms, digestive disturbance, irritation of eyes and noise, and thyroid gland disorders. PCBs are also a suspected carcinogen.

PCBs identified at business sites are reflected on the **Hazardous Materials Register**. Prior to the commencement of works at business sites, the Hazardous Materials Register will be reviewed to assist in identifying and controlling potential risks associated with PCBs.

Where PCBs are located (or potentially located) at a worksite, the work team must identify relevant actions within the WHRA to control the hazard. Actions to be considered by the work team include:

- avoid smoking, eating or drinking in the working area
- wash hands and face with soap and water at the conclusion of work and/or prior to eating, drinking or smoking
- use appropriate Personal Protective Equipment (PPE) including chemical resistant gloves, safety glasses/goggles, long sleeves, long trousers and appropriate safety footwear (disposable overalls and respiratory protection may be required based on the risk assessment); and
- use exhaust fans when working in confined areas to avoid the build-up of gases.

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If skin contact occurs, wash the area immediately with soap and water, dry with disposable towels/rags and seek medical attention if drying/chapping of skin occurs. If eye contact occurs, thoroughly flush with running water for a minimum of 15 minutes and seek medical attention.

4.1.2 Reporting

Reflecting the requirements of the Polychlorinated Biphenyl (PCB) *Chemical Control Order 1997 under the Protection of the Environment Operations Act 1997* (NSW), annual reporting must be provided to the NSW EPA.

4.2 Storage

4.2.1 Storage licensing requirements

An Environment Protection License from the NSW EPA is required if the cumulative total of oil within redundant equipment, oil removed from equipment and oily water removed from oil water separators exceed one or more thresholds detailed in Table 1 below. Therefore the disposal process for waste oil (Environmental Management Standard EMS 0007 – Waste Management) must be commenced as soon as possible to prevent storage threshold exceedance.

Oil stored in oil-filled equipment while awaiting refurbishment or PCB testing is not considered a waste and is exempt from the licensing requirements discussed in this section. However, removal and lawful disposal by a licensed liquid waste contractor must be undertaken within **three weeks** of being advised that the oil contains PCB (refer to Environmental Management Standard EMS 0007 – Waste Management).

Table 1: Oil and Oily Water Storage Licensing Thresholds

Oil Category	PCB Concentration	Maximum Storage
PCB containing oil	> 2 mg/kg PCB	5,000 litres
Scheduled PCB oil	> 50 mg/kg PCB	One tonne or 1,000 litres
PCB free oil	< 2 mg/kg PCB	60,000 litres
Oily water	N/A	5,000 litres

4.2.2 General Storage requirements

All out-of-service oil-filled equipment, including Envirottemp FR3 fluid, must be stored in a permanent or temporary bund.

- Permanent or temporary bunds will have a minimum capacity of 1.5 times the transformer oil volume. In the event of insufficient bund capacity, new distribution transformers will be stored on a sealed surface that is:
- located within a secure site, for example FSC or substation
- located at least one (1) metre from the site boundary, workshop, dwelling or emergency escape routes
- located at least five (5) metres away and not upslope from any protected place, body of water, stormwater drain, watercourse or environmentally sensitive area

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- located at least five (5) metres away from ignition sources and any store of flammable and/or combustible liquids
- located and identified in such a way to minimise the potential for damage by vehicle collision or vandalism
- located adjacent to a fully stocked, appropriate and identifiable spill kit; and
- inspected regularly for damage, sediment, oil, combustible materials, debris and non-complying usage.

Additional requirements that apply to the storage of drums are detailed in Substation Maintenance Instruction SMI 121 – Storage and Handling of Insulating Oil.

If oil-filled equipment is stored on a pallet (either within a bund or on a sealed surface), the integrity of the pallet must be assessed regularly to determine if it can support the weight of the equipment.

4.2.3 Permanent bunds

The design of permanent bunds will comply with AS 1940 – The Storage and Handling of Flammable and Combustible Liquids. Operating requirements include:

- installing appropriate signage specifying material stored, oil response procedures and emergency contact details
- placing oil-filled containers and equipment a sufficient distance from the inside edge of the bund so that in the event of a puncture the liquid will be contained (generally half the height of the storage container)
- signposting valves in draining bunds and providing adequate information to workers on the correct setting for normal operation and maintenance activities
- cleaning and servicing on a quarterly basis by an appropriately licensed liquid waste contractor
- regularly removing refuse and appropriately disposing in accordance with Environmental Management Standard EMS 0007 – Waste Management
- maintaining a current Trade Waste Agreement for FSC bunds fitted with oil-water separators which discharge to sewer; and
- contacting the relevant licensed liquid waste contractor when a high level warning is activated on a FSC sump.

4.2.4 Temporary bunds

Temporary or portable bunds will only be used for a finite time where a permanent bund is not practical or available. In addition to the general requirements detailed in Section 4.2.2 General requirements, operating requirements include:

- placing oil-filled containers and equipment in a single level (unstacked) and a sufficient distance from the inside edge of the bund so that in the event of a puncture the liquid will be contained (generally half the height of the storage container)
- installing the bund on a level surface and, where possible, under cover
- maintaining any drain valves in a fully closed position at all times except during controlled conditions for the purpose of maintenance
- retaining a minimum capacity of 1.5 times the volume of stored oil filled containers and/or equipment
- contacting the Transmission Manager or site property manager to arrange bund repairs or replacement

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- regularly removing refuse and disposing in accordance with EMS 0007 – Waste Management; and
- consulting with the relevant Environmental Specialist prior to commissioning where there is doubt that the above requirements can be achieved.

Liquids that accumulate within a temporary bund must be removed in accordance with the criteria detailed below.

Table 2: Removal options and criteria for liquids accumulating in temporary bunds

Removal Option	Criteria
Pump accumulated liquid into a permanent bund fitted with an oil-water separator	< 1,000 litres of liquid; and NO evidence of an oil sheen. Monitor oil-separator performance.
Engage a licensed liquid waste contractor to pump out accumulated liquids and legally dispose	> 1,000 litres of liquid; and/or Liquid contains oil or visible oil sheen.

4.2.5 PCB Storage

PCB containing oils must not be combined with PCB free oil. The storage area must comply with AS 1940 – The Storage and Handling of Flammable and Combustible Liquids, 2004 and appropriate containers in good condition must be used to store PCB containing oils (for example 205 litre drums with clip on lids or 1,000 litre Intermediate Bulk Container tanks). All storage containers must be clearly marked as containing PCB oil.

PCB capacitors or light fittings must be double wrapped in plastic and sealed with adhesive tape. The items must be segregated at the nearest FSC whilst awaiting removal and lawful disposal by a licensed waste contractor. Contact the Sustainability Workplace Experience Manager for assistance.

4.3 Transport

4.3.1 Transport licensing requirements

A licence (or licences) may be required when transporting oil if certain PCB concentrations, or oil and oily water volumes are exceeded. Table 3, below, summarises the thresholds that trigger transport license requirements. Refer to Section 4.3.4 for Dangerous Goods Requirements.

Table 3: Oil Transport Licensing Thresholds

Oil Category	PCB Concentration	EHC Act licence	POEO Act Waste Transport Licence
Non-scheduled PCB containing oil	> 2 mg/kg - 50mg/kg PCB	NA	>200 L (waste oil only)
Scheduled PCB oil	> 50 mg/kg PCB	One tonne or 1,000 litres (PCB material or waste)	>200 L (waste oil only)
PCB free oil	< 2 mg/kg PCB	NA	>200 L (waste oil only)
Oily water	< 2 mg/kg PCB	NA	>200 L (oily water only)

These thresholds do not apply when transporting oil-filled equipment from the worksite to the Field Service Centre (FSC) storage area for the purpose of assessment and PCB testing. If the thresholds for transporting

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waste oil removed from oil-filled equipment or oily water removed from oil water separators are likely to be exceeded, then the waste oil or oily water must be stored at its place of origin (for example at zone or transmission substations) prior to removal by an approved Endeavour Energy truck and driver, or a licensed liquid waste contractor.

If waste is to be transported under the business's waste transport license (EPL #21666), the following conditions must be met:

- The driver must have completed annual training
- The waste must be tracked using the NSW EPA's Online Waste Tracking Portal
- Only these sites are to be utilised as Receiving Facilities:
 - o Springhill FSC,
 - o Narellan FSC,
 - o Hoxton Park FSC and
 - o Mount Druitt TS)
- The Pollution Incident Response Management Plan (PIRMP) developed to comply with the licence is to be kept at all times in vehicles used for transporting
- Waste streams (e.g. waste oil and oily water) must not be mixed; and
- General Transport Requirements (refer Section 4.3.2).

4.3.2 General Transport requirements

Workers undertaking the transport of oil and oil-filled equipment must adhere to the following requirements:

- licensing requirements – refer to Section 4.3.1
- carry Safety Data Sheets in the vehicle
- use of appropriate dangerous goods placards and Emergency Information Panels as required (refer to Section 4.3.4)
- carry an appropriately maintained spill kit sufficient to contain the volume of the largest container or oil filled equipment being transported
- carry appropriate PPE (including chemical resistant gloves, safety glasses/goggles, long sleeves, long trousers and appropriate safety footwear (disposable overalls and respiratory protection may be required based on the risk assessment)
- secure and seal containers or packages to minimise leaking or damage
- store drums upright in the vehicle, cover and appropriately secure; and
- decant oil to a new drum prior to transport where the integrity of the original drum is compromised (for example rust, significant dints, etc).

4.3.3 Transformers and Oil-Filled Equipment

Transportation of transformers and oil-filled electrical equipment will be conducted in accordance with the business's HSE Quick Guide – Transporting oil filled transformers from the field to the FSCs.

A licensed liquid waste contractor must be contacted to drain the equipment of oil prior to transport. If a contractor is not available, a risk assessment must be completed to determine the risk of transporting the equipment without draining the oil compared to waiting until it is possible to drain the equipment first.

Before transport do these checks to minimise the risk of leaks:

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- inspect the electrical connections, insulators, taps, vents, pipes and other weak points
- test all taps and plugs for tightness and leaks and apply sealant where appropriate
- seal all vents, holes and openings

Put these measures in place before transport, after completing checks listed above:

- wrap damaged or leaking equipment in plastic and store in a suitable bund on the vehicle
- the bund must have capacity for at least 1.5x the volume of any liquid oil, and sufficient absorbent material present to absorb at least 1.1x volume of oil in the transformer.
- secure new transformers on the manufacturer's pallet (for example tie down, bolt or screw to the deck board) and establish that the pallet is structurally sound
- the equipment must be secured with suitable material to prevent inadvertent movement during normal conditions of transport.

4.3.4 Dangerous Goods Requirements

Scheduled PCBs are a Dangerous Good, and as such are subject to labelling requirements and may also require placarding and Emergency Information Panels (EIPs) under certain circumstances.

All containers holding scheduled PCBs at a volume greater than 1 litre must be labelled. The information contained on the EIP (Figure 1) satisfies the labelling requirements.

Transportation of oil or oil-filled equipment containing scheduled PCBs requires placarding and/or Emergency Information Panels (EIPs) under the circumstances summarised in Table 4.

Table 4: Placarding and EIP requirements when transporting **scheduled PCBs**

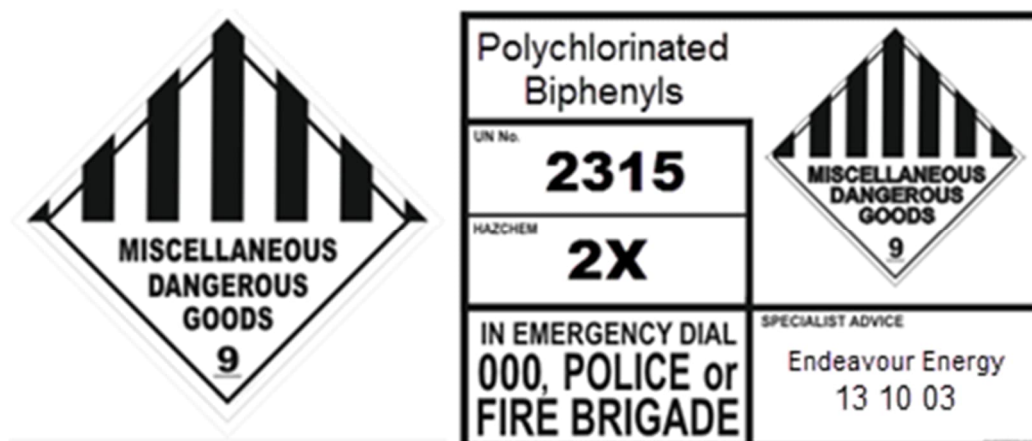
Container	Placarding Required?	Placarding Placement	EIP Required?	EIP Placement
Transformer	Yes	Front and rear of vehicle	Yes if > 500 L	On transformer, & on side and rear* of vehicle
Drums (200 L)*	Yes if >5 drums	Front and rear of vehicle	No	NA
IBC (> 500 L capacity) *	Yes	On front of vehicle	Yes	On IBC, & side and rear of vehicle

* use only approved dangerous goods containers

The EIP also satisfies the requirement of placarding (i.e. a separate placard is not required where an EIP is in use). The required placard and EIP are shown in Figure 1 following.

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Figure 1: “Class 9 Miscellaneous Dangerous Good” placard (left) and Emergency Information Panel (right).



It is recommended that workers consult with an Environmental Specialist when planning on transporting scheduled PCB oil or oil-filled equipment.

Non-scheduled or PCB free oil is not a dangerous good for transporting purposes and a dangerous goods license is therefore not required.

4.4 Wash Bays

Wash bays are installed at Field Service Centres and logistic facilities under approved Trade Waste Agreements issued by the relevant water supply authority. Compliance with these Trade Waste Agreements is monitored by the relevant Environmental Specialist.

Only quick-break detergents and degreasers available from stores or those that are provided by Fleet are to be used in wash bays at Field Service Centres and logistic facilities. No oils, fuels, solvents, batteries or chemicals (besides quick-break detergents and degreasers) are to be stored in the wash bay unnecessarily without being on a temporary bund.

4.5 Oily Water Separators

Oily water separators are located at both FSC and substations. They act as an environment control to manage oily water discharged from Wash bays and substation stormwater management systems.

Management of oily water separators is described in the following document [SMI115](#).

4.6 Audit and Inspection

The adequacy and effectiveness of this procedure will be assessed in accordance with Company Procedure GSY 0025 – Safety and Environment Audit.

Environmental inspections, conducted in accordance with Company Procedure GPE0013 – Monitoring, Measurement, Analysis and Continual Improvement of Environmental Performance, will include:

- periodic inspection of temporary bunds, permanent bunds and oil-water separator effluent
- periodic testing of separator effluent to assess compliance with petroleum hydrocarbon concentration limit (10mg/L); and

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- inspections of FSC temporary bunds following a major rainfall event (greater than 10mm in a 24 hour period) and/or high winds.

In addition to the above, Substation Civil will conduct inspections of temporary bunds located in zone and transmission substation in accordance with SMI 115 Oil Water Separators and Bunds and following:

- major rainfall event (greater than 10 mm in a 24 hour period); and/or
- high winds.

5 Authorities and Responsibilities

Chief Data, People and Sustainability Officer has the authority and responsibility for:

- approving this Standard, including any variations
- making all decisions concerning compliance in respect of this Standard; and
- delegating any of these authorities and responsibilities to the Head of Health & Safety.

General Manager Safety and Operations has the authority and responsibility for endorsing this Standard, including any variations.

Head of Asset Planning & Performance has the delegated authority and responsibility for endorsing this standard for minor changes and making recommendations to General Manager Operations for major changes in respect to this instruction.

Head of Sustainability has the authority and responsibility for:

- reviewing this Standard and making recommendations to the Chief Data People and Sustainability Officer
- making recommendations concerning compliance in respect of this Standard; and
- providing annual notification to the NSW EPA on the identify, amount and location of waste consisting of scheduled PCB waste (that is, material destined for disposal or recycling).

Project Managers/Operations Managers have the authority and responsibility for:

- storing and transporting oil and oil-filled equipment in accordance with the requirements of this Standard
- informing workers under their control of their responsibilities under this Standard; and
- labelling PCB containing materials (including storage containers, power transformers, and other oil-filled electrical equipment that has been tested and confirmed to be PCB containing).

Site Managers have the authority and responsibility for monitoring and maintaining temporary bunds located in FSCs in accordance with the requirements of this Standard.

Transmission Managers have the authority and responsibility for monitoring and maintaining temporary bunds located in zone and transmission substation sites in accordance with the requirements of this Standard.

Manager Property has the authority and responsibility for constructing and maintaining permanent bunds at FSCs.

Environmental Specialists have the authority and responsibility for:

- establishing and maintaining Trade Waste Agreements
- monitoring compliance against Trade Waste Agreements
- conducting periodic inspections of temporary bunds, permanent bunds and oil-water separator effluent during regular site inspection
- conducting periodic testing as required of separator effluent to assess compliance with petroleum hydrocarbon concentration limits (10mg/L)
- conducting inspections of FSC temporary bunds following a major rainfall event (greater than 10 mm in a 24 hour period) and/or high winds
- establishing and maintaining Environment Protection Licenses

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- monitoring compliance against Environment Protection Licenses; and
- providing guidance to workers on the establishment and maintenance of temporary bunds.

Sustainability Workplace Experience Manager

- establishing a contract for the cleaning of oil-water separators fitted to bunds at FSCs
- establishing and managing a contract for the provision of licensed liquid waste services.

Workers have the authority and responsibility for conducting operations in accordance with the requirements of this Standard.

