



Generic Spill Contingency Plan

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TABLE OF CONTENTS

1.0	INTRODUCTION.....	2
1.1	Purpose of the Spill Contingency Plan.....	2
1.2	Contents of the Spill Contingency Plan	2
1.3	Harold Sutherland Construction Ltd. - Environmental Policy.....	2
2.0	ROLES AND RESPONSIBILITIES	3
2.1	Owners Responsibilities.....	3
2.2	First On-Scene.....	4
2.3	On-Scene Commander.....	5
2.4	Operations Manager.....	6
3.0	CLASSES OF SPILL	7
3.1	Spill of Diesel, Lubricating Oils, or Other Hazardous Materials.....	7
4.0	CLEAN-UP PROTOCOL.....	7
5.0	SITE REHABILITATION	8
6.0	NOTIFICATION AND ACTION LIST	8
7.0	SPILL REPORTING	8

1.0 INTRODUCTION

Harold Sutherland Construction Ltd. Limited (“Harold Sutherland Construction Ltd.”) requires the implementation of a site-specific spill contingency plan for spills that occur at any of the company sites or plants. The Spill Contingency Plan (SCP) has been developed to provide an appropriate and consistent response capability to any spill event.

1.1 Purpose of the Spill Contingency Plan

The purpose of the SCP is to have a system in place in the event of an emergency spill situation for the protection of life, environment and property/equipment. It is also intended to identify predetermined courses of action for accidents, system failures or other situations resulting in a spill event.

This plan defines the roles and responsibilities of key personnel and outlines the general procedures to be followed when responding to a spill event in a manner that will avoid or minimize health and safety risks, as well as environmental damage.

1.2 Contents of the Spill Contingency Plan

The Spill Contingency Plan will include the following elements:

- Notification and alerting procedures in the event of a spill;
- Contact information for spill reporting;
- Duties and responsibilities of the “On Scene Commander”;
- Duties and Responsibilities of the “Operations Manager” and other staff;
- Clean up Procedures in the event of a spill;
- Spill site rehabilitation procedures;
- An inventory of available resources in the event of a spill.

1.3 Harold Sutherland Construction Ltd. - Environmental Policy

A key ingredient of Corporate Policy for Harold Sutherland Construction Ltd. is a commitment, in the conduct of its activities, to reduce or eliminate any adverse effects on the natural environment. As well, Harold Sutherland Construction Ltd. will endeavor to protect the health and safety of its employees and others who may be affected by these activities. The environmental policy will be subject to review and revision when necessary. All employees will have changes brought to their attention as soon as practicable after they

have been made. Harold Sutherland Construction Ltd. is committed to a strong environmental plan that protects and preserves the biophysical environment in which its activities are carried out. Employees at every level, including management, are responsible and accountable for the company's overall environmental initiatives. Complete and active participation by everyone, everyday, in every job, is necessary for the environmental excellence the company expects. Management supports coordination of environmental initiatives and issues among all workers on the jobsite.

Management supports participation in the plan by all employees, and requires that all employees and contractors comply with the company environmental requirements as they relate to planning and the operation and maintenance of facilities and equipment. Employees are responsible for following all procedures and, wherever possible, improving on environmental measures.

The protection and preservation of the biophysical environment is our objective. Through heightened environmental awareness and action this can be accomplished.

2.0 ROLES AND RESPONSIBILITIES

The initial stage of any spill situation is critical. An effective and timely response is essential in preventing a situation from escalating. However, in reaching decisions on containment and clean-up procedures, the following criteria will be applied:

- Minimize danger to persons;
- Protect water bodies;
- Minimize area affected by the leak or spill;
- Minimize pollution of watercourses;
- Minimize the degree of disturbance to the area and watercourses during the clean up.
- Specific responsibilities and duties of personnel are outlined below.

2.1 Owners Responsibilities

- Harold Sutherland Construction Ltd. will ensure that its employees and agents comply with all applicable environmental laws, regulations, permits and requirements of federal and provincial authorities, and other relevant rules and requirements which Harold Sutherland Construction Ltd. shall establish with respect to its operations;

- Harold Sutherland Construction Ltd. will ensure that all plants and site operations are operated in compliance with all applicable laws, regulations, permits, and any other requirements;
- Harold Sutherland Construction Ltd. will ensure employees responding in the event of a spill are trained and practiced in spill response, containment and clean-up, including equipment deployment.
- In the event of a spill, Harold Sutherland Construction Ltd. will ensure that every effort is made to clean up and restore the affected area as rapidly as possible as a first priority of operations;
- Harold Sutherland Construction Ltd. will report all incidents of spillage or leakage of a regulated substance within one working day to the Province of Ontario Ministry of Environment, Owen Sound District Office by phoning (519) 371-2901 or faxing (519) 371-2905
- Harold Sutherland Construction Ltd. will submit a written report including a detailed description of the incident, a summary of the contributing factors, measures taken to clean up and monitor the area surrounding the spill and an action plan to prevent future occurrences. This report will be submitted within 30 days of the original incident to:

Ministry of Environment - Owen Sound District Office
101 17th St. East, 3rd Floor
Owen Sound, ON N4K 0A5
Telephone (519) 371-2109

2.2 First On-Scene

The individual who discovers a leak will do the following:

- If safe to do so, attempt to stop the leakage and contain the flow.
- If the person is unable to immediately stop the leak, report immediately to the senior on-site employee of Harold Sutherland Construction Ltd..
- This senior employee will act as the “On Scene Commander” (“OSC”) for the purposes of cleaning up the spill and containing the spilled material.

In the event that the spill material is coming into contact with, or close to, live wires or electrical equipment:

***DO NOTHING, STAY AT LEAST 10 METERS AWAY FROM THE WATER AND THE WIRES,
SECURE THE AREA, CALL OUT THE ON-CALL ELECTRICAL FOREMAN.***

The electrical foreman will isolate the electrical supply and make the area safe prior to anybody working on the spill response.

2.3 On-Scene Commander

Personnel designated “On Scene Commanders” will be trained in spill clean-up procedures and how to mobilize the clean-up equipment.

The On Scene Commander, upon being notified of a leak or spill, will do the following:

- Determine the substance accidentally released or spilled if not already known;
- Secure the spill scene and take all safety measures for the protection of human life;
- Identify potential fire hazards and eliminate them;
- Assess the requirement for evacuation of the area proximal to the spill;
- Assess the size and nature of the spill area and assess the requirement for additional personnel and resources;
- Contact **Robert Mantha, Operations Manager Aggregate Division, (519) 373-7242** to act as Operations Manager (“OM”). If Robert Mantha is not available, then contact should be made with the next person on the relevant telephone list at the end of this document.
- Commence efforts to contain the spill under direction of designated personnel (OM) and applicable procedures;

The following information will be provided if possible:

- Name of reporter and phone number;
- Time of leak or spill;
- Time of detection of leak or spill;
- Type of product leaked or spilled;
- Location of product leaked or spilled;
- Amount of product leaked or spilled;
- The source of the leak or spill;
- If the leak or spill is still occurring;
- If the leaked or spilled product is contained; if not contained, where it is flowing;
- Wind speed and direction;
- Temperature;
- Proximity to water bodies, wells, water intakes, buildings;
- Snow cover and depth, terrain, and soil conditions;

- Type of accident, if one has occurred- (e.g. collision, rupture, overflows,);
- Owners of product and phone number.

The “On Scene Commander” will act in consultation with the OM and regulating authorities to accomplish the following:

- Assess site conditions and environmental impacts of various clean up procedures;
- Assess potential for material recovery;
- Deploy on-site staff to build containment dykes and commence pumping spilled material into drums;
- Apply absorbents if necessary;
- Dispose of all contaminated debris, cleaning materials and absorbents appropriately;
- Take all necessary precautions to ensure that the incident does not occur.

2.4 Operations Manager

The Operations Manager (“OM”) will assume the overall responsibility of coordinating a clean-up and maintaining this contingency plan current and up-to-date. The Operations Manager will have full authority to take necessary and appropriate action with unnecessary delay.

The “Operations Manager” will be responsible for the preparation of a written report, including a detailed summary of the incident, summary of contributing factors, and an action plan to prevent future incidents of a similar nature. This report shall be submitted to the Ministry of Environment, Owen Sound District. The action plan will include a description of actions already taken and future actions to be implemented. This report will be submitted as soon as possible and no later than 30 days after the leak or spill to the following:

Environmental Officer
MOE Owen Sound District Office
101 17th St. East, 3rd Floor
Owen Sound, ON N4K 0A5
Telephone (519) 371-2901
1-800-265-3783

The local Municipal office will be notified by the OM in the event of a spill.

3.0 CLASSES OF SPILL

Spills of fuel and hazardous materials, as well as silt-laden water, can be damaging to vegetation, soil, surface water, groundwater, and wildlife. Spills anywhere within the boundary of any HSCL project work site or licensed site will be immediately dealt with, and any contaminated soils removed and transported to an approved disposal area.

3.1 Spill of Diesel, Lubricating Oils, or Other Hazardous Materials

Harold Sutherland Construction Ltd. will have on-site bulk storage for diesel fuel, lubricating oils, or other combustible fuels and asphalt cement.

The following measures will minimize the potential for spills affecting the environment

- All equipment will be serviced and fueled within the work site but at a specified location at least 30 m from any pond or in areas designated for spill containment.

There exists potential for a spill event associated with fuel delivery trucks, as well as spills associated with the fuelling of on-site equipment and leakage from associated fuel lines. Other petroleum products associated with equipment maintenance (e.g. hydraulic fluids, lubricating oils, solvents, and antifreeze) are used in relatively small quantities and represent a limited hazard.

4.0 CLEAN-UP PROTOCOL

Harold Sutherland Construction Ltd. shall assume the overall responsibility of coordinating a clean-up. In consultation with regulatory authorities, Harold Sutherland Construction Ltd. will:

- deploy on-site personnel to contain the spilled material using a dyke, pit, absorbent material as appropriate and necessary;
- assess site conditions and potential environmental impacts of various clean-up procedures;
- dispose of all contaminated debris, cleaning materials, and sorbent material (i.e., absorbents) using an approved disposal facility;
- choose and implement an appropriate clean-up procedure; and
- take all necessary precautions to ensure that the incident does not recur.

Clean-up equipment present at the site will include, as a minimum, three 45 gallon drum spill kits

5.0 SITE REHABILITATION

Harold Sutherland Construction Ltd. shall, in consultation with regulatory authorities, attempt to restore any site effected by a spill event.

6.0 NOTIFICATION AND ACTION LIST

The persons on the list below should be called upon to act as an “On Scene Commander” in the event of a spill or hazardous incident at any site of Harold Sutherland Construction Ltd.

<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Dave Munro	Compliance Mgr	519-375-2977 - Cell
Robert Mantha	Aggregates Operation Mgr	519-373-7242 - Cell
Jennifer Prentice	V.P. Finance	519-372-8859 – Cell 519-372-1961 – Home
Mark Shortt	Health & Safety Director	519-372-6178 – Cell

Transport Canada

Canutec

(613) 996-6666

MINISTRY OF ENVIRONMENT SPILLS ACTION CENTRE

(800) 268-6060

7.0 SPILL REPORTING

- Harold Sutherland Construction Ltd. will report all incidents of spillage or leakage of a regulated substance within one working day to the Ministry of Environment by phoning (519) 371-2901 or faxing (519) 371-2905

- Harold Sutherland Construction Ltd. will submit a written report including a detailed description of the incident, a summary of contributing factors, measures taken to clean up and monitor the area surrounding the spill and an action plan to prevent future occurrences. Such reports will be submitted within 10 days of the original incident to:

MOE Owen Sound District Office
101 17th St. East, 3rd Floor
Owen Sound, On. N4K 0A5
Telephone (519) 371-2901
800-265-3783