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1.0 PURPOSE & SCOPE

1.1 Purpose

The purpose of this Spill Prevention and Response Plan (SPRP) is to inform personnel of the required actions and guidelines to prevent spills and respond appropriately should spills occur during demolition or construction activities on NAPG projects.



The SPRP is an Environmental Management Plan (EMP) with the following objectives:

- Identification of plausible spill scenarios based on construction and demolition activities;
- Identification of control measures to prevent and mitigate plausible spill scenarios, including training and equipment;
- Record keeping and reporting requirements,
- Supporting the North Atlantic Project Group Environmental Plan (NAPG-EP) for the environmental performance of projects.
- Supporting Vale's Spill Prevention and Contingency Plans (SPCPs) for operations in Ontario that are required to have them.
- Supporting Vale's Environmental Emergency Plans (E2 Plans) for Canadian operations that are required to have them.
- Support Vale's Integrated Management System (VPS) objectives.

1.2 Scope

The SPRP identifies preventative measures and spill response actions to address unintended releases of potentially hazardous materials during the construction activities at NAPG Projects.

The SPRP requirements apply to all NAPG Project site personnel including project workers. The SPRP includes:

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- a) Roles and responsibilities of all personnel involved in spill response activities;
- b) Spill reporting requirements;
- c) Requirements for spill prevention measures and spill response equipment;
- d) Spill response actions and clean-up procedures to be executed; and,
- e) Follow-up remediation and restoration action requirements.

2.0 COMPLIANCE OBLIGATIONS

The compliance obligations associated with construction and demolition activities on the NAPG Projects are detailed in each Project's Permitting Plan.

Each jurisdiction has legislation covering spills as well as other types of releases. However, definitions and requirements for prevention, control and reporting vary. Each project must adopt and follow the requirements applicable for their work site. The following are the principle laws regarding spill prevention, control and reporting.

2.1 Federal:



- o Canadian Environmental Protection Act (Environmental Emergencies, Toxic Substances);
- o Fisheries Act (Deposit of deleterious substances);
- o Transportation of Dangerous Goods (TDG Releases); and,
- o Canada Shipping Act (Discharges in Canadian waters);

2.2 Ontario:

- o Environmental Protection Act, RSO 1990 (Spills, exemptions, and discharges);
- o Ontario Water Resources Act, RSO 1990, Chapter O.40 (Discharges); and,
- o Technical Standards and Safety Authority. (Leaks and discoveries of liquid fuels and petroleum products)

2.3 Manitoba

- o The Dangerous Goods Handling and Transportation Act (Environmental Accidents and reportable quantities);

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2.4 Newfoundland and Labrador

- Environmental Protection Act (Releases).

Various SPCPs prepared for Vale’s Ontario facilities outline spill prevention measures and contingency procedures for operations at the facilities. The SPCP prepared with respect to routine operations at the facility is applicable to a NAPG Project that is under construction within the facility. The NAPG SPRP supports the facility SPCPs as it covers items not related to operations (i.e., not included in the existing SPCPs).

3.0 ROLES AND RESPONSIBILITIES

The following table identifies roles and responsibilities specific to spill prevention and spill response, applicable to NAPG Projects.



3.1 Project

Manager- Health, Safety, Environment and Risk (HSER): Reports directly to the Director, NAPG and provides overall direction for all health, safety, environment and risk accounting activities at site. Spill prevention and response duties include:

- Approve any modifications or changes made to the SPRP.
- Appoint an Environmental Coordinator (or representative) to complete the responsibilities noted herein.
- Arrange for delivery of environmental training for all site personnel and contractors relative to spills prevention and response.
- Ensure monitoring of construction activities and performance to ensure that identified and appropriate control measures are being effective and ensure compliance with the SPRP.
- Approve designated locations for storage of hazardous products.

HSE Advisor/Environmental Coordinator: Reports directly to the Manager- HSER.

- Ensures all activities are performed in accordance with all legislation, regulations and Project policies and procedures.
- Coordinates closely with the Project Engineering to support the activities, such as, secondary containment requirements; as required.
- Provide Project training (which includes requirements relative to incidents and spills).



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- Complete periodic inspections to ensure spill prevention measures are being followed and to ensure response equipment is in good working order.
- Deliver training to all personnel working on the Project on the prevention and management of hazardous material spills, including training to designate staff and Construction Contractors on the operation and maintenance of clean-up equipment.
- Lead activities, in conjunction with Vale, in the event of an environmental incident.
- Review and approve Contractor environmental documentation prior to work starting;
- Develop content for environmental spills section of the Project site orientation;
- Lead the investigation and related activities in the event of an environmental occurrence / incident;
- Complete the communication process for all field environmental inquiries and liaise with the Manager, Corporate Affairs, Vale Canada as required;
- Provide advice and liaise with the construction team to ensure that environmental risks are identified and appropriate controls are developed and included within method statements and risks assessments (Example: Designated Substances & Hazardous Materials Survey, JHA, PMRA);
- Liaise with the Manager-HSER and the team to ensure coordination of environmental mitigation and monitoring procedures as required;
- Maintain spill records as per regulatory requirements and enters incident information and spill investigation reports in SAP-IM.

Environmental Lead: The Project's Environmental Lead reports to the Project Director/Manager and is responsible for coordinating and managing all the environmental activities during construction with support from HSE Advisors (or equivalent) in the field.

Spill prevention and response duties include:

- Define local statutory and regulatory requirements and communicate throughout the Project;
- Provide advice and liaise with the construction team to ensure that environmental risks are identified and appropriate controls are developed and included within method statements and risks assessments;
- Advise Construction Management on the requirements of the SPRP including managing compliance, reporting on performance, arranging to inspect and audit the Plan and propose improvements;

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- Regularly review, audit and update the SPRP and specialist procedures and plans as required;
- Set up system to collect, store and dispose of small quantities of hazardous waste generated by the projects, e.g. spill clean-up materials;
- Coordinates annual review of the SPRP and documents exercise.

Construction Manager: Reports to the Project Director/Manager and provides a single point of contact for all construction activities at site. Spill prevention and response duties include:

- During the construction, directly responsible for all activities and scope related to Construction and Management.
- Environmental management within the battery limits;
- Ensuring all personnel on-site adhere to the NAPG-EP and associated EMPs;
- Regular project review meetings address environmental issues;
- Implement and ensure compliance with the SPRP and applicable regulations and guidelines through planning, training, managing, monitoring, auditing and reporting.
- Oversee Contractors to ensure compliance with the requirements of the SPRP.
- Monitor all site contractors and subcontractors bringing chemicals and hydrocarbons to the Site for the Project.
- Ensure that Contractors provide readily available appropriate spill clean-up equipment at all locations where spills may occur and work is being completed.
- Provide all necessary information and documentation required by regulation to the HSE team and as required by Vale's host site Environmental Group, such as, spill reports following successful implementation of clean-up and remediation measures.

Project Team: Responsibilities of the Project Team include the following where requested by the Manager-HSER:

- Inspect and audit project activities as required;
- Support external communication by Vale relative to spill or release issues, as requested;
- Provide technical support for field identification of equipment, content and piping etc to mitigate or prevent spills;

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- Contracts Manager ensures the NAPG-EP, EMPs and appropriate certificates are included in tender documents.

3.2 Vale



Vale Operations Environmental Group: Responsibilities of the Group include the following:

- Provision of training information and training material, where requested;
- Conducts table top exercises for spill prevention/contingency plans; and,
- Provide on-call coverage for environmental occurrence regulatory reporting.
- Assess and classify any incidents.
- Receive spill notification and formal reviews from Contractor or Project team.
- Provide verbal notification and written reports to external authorities when required.
- Provide support to the Project team and/or Contractor in fulfilling their obligations with respect to spills by providing advice and/or mobilizing environmental department personnel to assist where necessary with sampling, government inspections and investigations, etc.
- Facilitate on-going communications with authorities, with respect to incidents.
- As required, report to management along with any current information on spill reduction initiatives.

3.3 Contractors

Contractor Environmental Representative: The Contractor’s Environmental Representative is responsible for the day-to-day environmental management, which includes:

- Notify the project of spills and other environmental incidents using this procedure.
- Issuing a “stop work order” if unknown or unanticipated environmental risks or work conditions evolve that may impact the environment or necessitate greater precautions.
- Supervising the installation of control measures and any remedial actions that may result from their activities.

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- Use hazardous products for their intended purpose using all safeguards identified in the SDS.
- Identify and evaluate the risk of spills as part of PMRAs and JHAs.
- Provide a management guide for each storage area/facility of hazardous products that, documents the types and quantity of materials stored, secondary containment provided, access control, inventory management, emergency procedures, training requirements and appropriate spill control equipment.
- Prior to commencement of work, ensure that all project personnel have the required spill prevention and response training and document this in writing.
- Ensure that all spill clean-up equipment is in good working condition, is in sufficient quantity and is available in areas where hazardous materials are used and stored.
- Coordinate on-site containment and clean-up activities in the case of a spill.
- Properly dispose of any and all wastes generated from spill clean-up activities. No clean-up materials can be disposed at Vale facilities without prior notification and approval by the Project HSE.



All On-Site Project Personnel and Contractors:

- Follow all requirements of this SPRP, including spill prevention measures and spill response procedures.
- Inform their supervisor or designate immediately when a spill or other issue of non-compliance with this SPRP occurs. Supervisor or designate shall immediately inform Contractor Environmental Representative, and the Project Team (as required, see Section 2.6).

4.0 DEFINITIONS

Emergency: A situation or a set of circumstances which, if not promptly eliminated, controlled or contained, results or could result in significant injury to people (including the community) and/or damage to the plant, property or the environment. A spill may be considered an emergency.

Event: A quantifiable occurrence or happening (not a condition, state, issue or conclusion).

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Environmental incident: Accidental discharge of solids, liquids or gases that is potentially harmful to the environment. It applies to hydrocarbon spills, fire, explosions, noise, odours, paint, acids, bases, pesticides, other chemical products and contaminated water emanating from the worksite.

Incident: An unplanned event that may or may not result in harm to personnel, the environment or assets or equipment.

Hazardous Product: Material or substance that has potential to cause harm to persons, property or the environment due to its chemical, physical or biological properties as described in SDSs.

Hazardous Waste: Waste material that meets the definition of hazardous waste in the jurisdiction the project is being built. (Subject waste in Ontario).



Near Miss: An undesired event (transfer of energy) that, under slightly different circumstances, could have resulted in harm to people or damage to property, materials or the environment.

Spill: For the purposes of this procedure the Ontario spill definition is provided. Other jurisdictions may define spills or discharges differently:

A discharge of a pollutant into the natural environment; from or out of a structure, vehicle, or other container and that is abnormal in quality or quantity in light of all the circumstances of the discharge. (Source: Ontario Environmental Protection Act)

- "Natural environment" means the air, land and water, or any combination of the three. Both "air" and "land" mean the air and land not contained in a building or structure. Therefore, a discharge of a pollutant that does not escape outside a building or structure is not a spill. "Water" includes surface water or ground water.
- "Structure" and "container" may include anything built by human activity, especially to contain a substance (e.g., tanks, containment ponds, reservoirs, or fuel cans). Engineered landfills or stacks of tires designed to contain waste, can also be structures or containers.
- "Abnormal" means a discharge that is not part of the normal activities of a plant or facility.

Exceedance: Non-compliance with limits specified in a legal instrument (e.g. Permits, Environmental Compliance Approval, etc.) on amount or quality of discharge or release to air, water or land as a result of an environmental incident.

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5.0 REQUIREMENTS

5.1 Spill Prevention Measures

The following section outlines spill prevention measures that shall be built into contractor standard operating practices for NAPG Projects. Proper training and well maintained equipment is at the forefront of spill prevention. Well-trained employees can reduce human errors that lead to accidental releases or spills.



The Contractor shall ensure that any spill prevention measures that may be damaged due to an incident or severe weather are immediately replaced and/or repaired. Any spill mitigation supplies or equipment that are consumed and/or damaged during an incident shall be immediately replaced and/or repaired.

5.1.1 Hazardous Materials



The Contractor shall ensure that hazardous materials are used, stored and handled in accordance with their SDS and only in Project areas where their use is designated.

Facilities/equipment shall meet regulatory requirements where applicable. Such requirements shall be determined through risk assessment using the Project's PMRA or JHA process. The following is a list of practices that may be required following a risk assessment:

- Locate hazardous materials storage facility at least 100 m from any surface waters or drainage feature;
- Protect storage facilities against weather conditions such as rain, snow, sun and wind and ensure they are well ventilated with an impermeable floor and curbing to contain minor leaks and spill;
- Clearly label storage facilities and associated infrastructure to indicate contents and the nature of the stored products;
- Keep new products in their originally labeled container unless they are not re-sealable; label all stored products and containers and ensure that SDSs are available;
- Store incompatible materials separately and in accordance with their SDS;
- Ensure that stack heights do not exceed two drum heights on pallets. Replace defective pallets and ensure that a minimum of 80 centimeters is left between stacks, and 100 centimeters is left between stacks and a wall.

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- Protect spill trays and secondary containment from rainwater infiltration, if possible.
- Inspect spill trays and secondary containment for rainwater. Remove and dispose of rainwater using a qualified service provider or competent internal resources with appropriate treatment.
- Register all storage tanks or other containers for flammable and combustible reservoirs as required by petroleum product regulations;
- Contain all tanks, drums and other storage containers which contain hazardous materials within an embankment, a chemical-resistant concrete berm, or an equivalent containment structure, capable of holding 110% of the largest container plus 25% of the total volume stored, whichever is greater;
- Ensure that the bermed area is sloped towards a low point to allow for spill collection. Drainage or openings shall not be permitted in the impounding structure. In the event that a spill occurs, safely vacuum or use absorbent material to collect/separate contaminants – do not drain out of impoundment;
- Empty tanks with leaks until they are repaired;
- Ensure tank materials and hardware are compatible with stored materials;
- Ensure that spill response procedures and sufficient spill clean-up materials are maintained at the storage facility by the Contractor;
- Lock off tanks except during loading or off-loading, and equip them with an automatic shut-off system and an alarm;
- Store tanks or drums in designated locations with signage, impact protection and secondary containment.
- Protect fuel storage areas with abutments (bullards, guard posts or concrete blocks) to prevent collision by vehicles;
- Prohibit smoking within at least 10 m of hazardous material storage and refuelling facilities;
- Ensure all necessary firefighting equipment is adequate and available;
- Equip portable tanks with emergency venting and drip trays;
- Equip portable fuel cans (< 25 litres) with self-closing, explosion-proof spouts, anti-spill mechanisms and labels and ensure that they are dedicated to the original fuel stored;

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- If there is no need for a flammable liquids storage area, ensure that flammable liquids are stored in a metal cabinet designed for flammable storage, with symbolic signs indicating “no open flames” and “no smoking” in the vicinity;
- Store gas cylinders in a dedicated area, separately according to their types. Ensure they labeled, are maintained in a vertical position and are firmly attached to a solid structure;
- Inspect above ground storage tanks and secondary containment systems for condition, maintenance needs and signs of leaks, spills or rainwater accumulation;
- Maintain an up-to-date register of quantities of stored hazardous materials and make available upon request for inspection; and
- Ensure that storage areas are kept free of weeds, debris, and any unnecessary combustible material.

The Contractor shall decommission the hazardous material storage facility within 30 days of work completion. All storage tank systems shall be emptied of products. Associated piping shall be removed from the ground, any contaminated soil shall be removed, the area shall be cleaned, and the site shall be restored.

5.1.2 Fuel Handling and Transfer



The Contractor will be required to abide by the following procedures related to spill prevention during fuel handling and transfer:

- Prior to transporting fuels and oils on the Site, submit to the Project for approval, the emergency plan it proposes to implement in the event of a fuel or oil spill and ensure that the driver of the transport vehicle has received written instructions on what actions are required in the event of a spill;
- Mobile fuelling is the preferred method to fuel vehicles and equipment; Minimize the number of temporary fuelling tanks and stations.
- Ensure that delivery of fuel to the site is by approved highway tanks or mobile refuelling tanks. Delivery may be into on-site mobile refueling tanks or directly into the equipment;
- Ensure that refuelling of vehicles and equipment on project site is carried out either in dedicated areas with impermeable surface or while using liners or drip trays;
- The Project HSE department shall approve all dedicated refuelling areas on surface;

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- Consider the use of an oil/water separator, as needed;
- Ensure that all dispensing or transferring of fuel will be attended for the duration of the operation and that the attendant is aware of proper fuel handling procedures to minimize the risk of a spill, including continuously scanning the area adjacent to the fuelling operation for possible leaks or spills;
- During unloading of fuel, ensure that trucks are appropriately grounded and bonded to avoid the possibility of static charge;
- Do not transfer product from a highway tank or mobile refueling tank except by means of pumping. The pump shall be equipped to prevent siphoning of the tank should a leak occur in the fuel nozzle, hose, or pump;
- Stop the transfer of fuel prior to overflowing, leaving room for expansion. Mobile refueling tanks and fuel tanks on vehicles and equipment are not to be overfilled;
- Maintain regular inspections of fuel systems and their components. Check for leakage, deterioration, or damage;
- Avoid dispensing within:
 - a) a building;
 - b) 30 m of a watercourse;
 - c) 3 m of a property line;
 - d) 4.5 m of any opening in a building; or
 - e) 3 m from any source of ignition;
- Ensure that a fire extinguisher with a minimum rating of 20B:C is readily available for use and spill containment kits adequate to contain any spill that may occur are readily available during fuelling; and,
- Ensure that cell phones are off during re-fuelling and within 5 meters of a fuel pump.
- Only certified petroleum equipment mechanic may repair from fuelling equipment (hose, pump, tank, etc.).

Contractors must also abide by all other requirements of the *Technical Standards and Safety Authority's Liquid Fuels Handling Code* In Ontario or equivalents in other jurisdictions. These may include mobile fuelling requirements, dispensing requirements, signage and product identification, among others.

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5.1.3 Transport Trucks, Construction Vehicles and Heavy Equipment

The following spill prevention and mitigation requirements apply for the transportation of hazardous materials:

- Transport vehicle must be equipped with fire fighting and spill response equipment.
- Ensure only properly licensed carriers are used;
- Ensure that transportation vehicles are appropriately identified and signs posted to warn of the nature of the material being transported in accordance with the UN Hazard Classification System and TDG placarding rules;
- Ensure that the vehicle is in sound condition and capable of containing any leakages, and has sufficient capacity to carry the materials without overloading;
- Provide documentation, such as the Safety Data Sheet, to the transporter and accompany each consignment of hazardous materials;
- Ensure that transporters and persons involved in the transportation of these materials shall be appropriately trained in the nature and hazard of the materials as well as appropriate spill response for the materials; and,
- Ensure that ownership and control of transported materials is made clear prior to transport such that in the event of spill responsible parties are prepared to provide response activities as needed.

The following apply to construction vehicles and equipment:

- All construction vehicles and equipment on-site shall be equipped with a minimum of 10 kg ABC fire extinguisher, a first aid kit and a spill kit(s) suitable to the material being transported and of sufficient capacity to contain any spill that may occur.
- Do not allow vehicles or equipment leaking hydrocarbon fluids to enter the site until they are repaired, or if being repaired on site, must be repaired in a designate area approved by the Project HSE Department. All repairs conducted on site must be approved by the Project and risks managed through the JHA process;
- Ensure that lubricants, coolants and other hazardous material used for vehicles and equipment maintenance are stored in limited quantities in the appropriate maintenance areas;

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- Store and dispose used oil, coolant, filter and other hazardous waste generated by vehicles and equipment maintenance in accordance with the NAPG Waste Management Plan and site-specific procedures;
- Conduct preventative maintenance on all vehicles and equipment on a periodic basis according to manufacturers' manuals;
- Equip **all** stationary equipment using diesel or gasoline with secondary containment.

5.1.4 Surface Water Protection Measures

Prevention measures are required for the protection of surface water. Although there may be no natural surface water bodies within the Project area, drainage may be directed to a wastewater treatment system using drainage ditches and collection ponds. Measures to protect surface water apply to these ditches and collection ponds and are detailed in the *Water and Wastewater Environmental Management Plan*.

5.1.5 Spill Response Planning

Contractors shall develop and implement written safe material handling procedures as well as spill response procedures for hazardous materials storage areas and at fuel handling locations.



Contractors shall ensure that spill clean-up equipment is available in areas where hazardous materials, including fuels, are stored and used. Equipment must be appropriate and adequate for the nature and quantity of material that could be spilled and the hazards presented.

5.2 Spill Equipment Requirements

The availability and maintenance of spill response equipment are essential for a quick and effective response.

A sample spill equipment inspection checklist is provided in Appendix A. Where a work management system has been implemented, i.e. SAP monthly inspection of spill kits shall be generated.

The following sections provide typical equipment lists for contractors to supply depending on the quantity and nature of materials stored or used on site. The equipment must be maintained in good working condition and inspected monthly.

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5.2.1 Required Resources

Contractors shall provide sufficient spill response equipment to contain and clean-up all potential spills associated with their work. Equipment will include spill kits (absorbent pads, socks, etc.), shovels (non-sparking), drums or industrial containers/bins for disposal, construction equipment (skid steer or loader) for removal of contaminated soil, and appropriate PPE.

5.2.2 Fuel Handling and Transfer Spill Kits



Contractors shall ensure that fuel handling and transfer areas are equipped with spill response equipment to respond to fuel spills or leaks. The minimum equipment recommended in a fuel handling/transfer location includes (more may be required for large installations or remote locations):

- Tyvek splash suits;
- Absorbent socks (minimum 4);
- Absorbent pads (minimum 25);
- Granular absorbent on surface only (minimum 1 gal);
- Sections of Linkable Absorbent Boom (minimum 3);
- Oil Absorbent Pillows;
- Drain Covers;
- Epoxy filler (stoppering paste);
- Hazmat Disposal Bags;
- Nitrile Gloves (minimum 2 pairs);
- Fuel transfer hoses with pumps; and,
- Empty storage drums/containers

5.2.3 Hazardous Products Storage

Contractors shall ensure that the hazardous products storage area is equipped to recover spills of stored materials. The minimum equipment required includes:

- Supply of bulk inert sorbents such as sorbent flakes, sand, or clay soil;

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- Sorbent socks and booms to contain spills;
- Sorbent pillows;
- Neoprene drain covers;
- Shovels, mops, and brooms;
- Plastic containers with lids for storage of recovered materials; and,
- Disposal bags.

5.3 Spill Response Measures

5.3.1 Response Activities

Contractors must be sufficiently prepared to address spills that may arise as a result of their specific work at the site. Any support required from Vale or Project resources must be requested and approved through the PMRA process.



Spill response and clean-up activities are required for all spills. The level of response activities, including the amount of resources (equipment and personnel) required will be dependent upon the magnitude, quantity, nature of the material released, and the general characteristics of the surrounding environment.

Timely, internal and external, reporting and communication is required. See Section 7 for details.

5.3.2 Immediate Response and Containment

The first person(s) on the scene of an environmental leak or spill must take all reasonable steps to:

- Notify occupants in the immediate area of the spill;
- Assess immediate health and safety hazards to themselves and others in area;
 - Contractors should first respond to any health and safety concerns then once safe to do so, execute spill containment and clean-up.
- Stop the leak or release if safe to do so; Identify the source, assess the scene, and stop the spill by doing any of the following (if possible):
 - Cease filling operations;

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- Turn off valves or pumps;
- Use patching kits to seal leaks;
- Remove ignition sources if safe to do so;
- Contain the spill if safe to do so (especially where there is a risk a spill could enter a natural water course, a drainage ditch or catchbasin):
 - Block material from flowing further (using socks, pads, etc.) and prevent spill from reaching water courses, catchbasins or unpaved areas;
 - Cover or close nearby drains;
 - Notify downstream personnel if spill not fully contained;
 - Rope or cone off affected area;
- Stay uphill and keep upwind if possible; and,
- Notify the area Supervisor or designate, and the Contractor's Environmental Representative.

The Supervisor or designate and the Contractor's Environmental Representative will then notify the Project's HSE staff and, if applicable, Vale Operations Environmental On-Call and proceed to the scene to evaluate the situation.

All incidents that are considered emergencies, such as fires, shall follow the project's emergency response procedure. If necessary, emergency response personnel will be summoned by either the Project HSE staff or by the host operation's Environment Department (or On-call). The Project may order an evacuation of the immediate work area, if necessary.

5.3.3 External Resources

For situations requiring additional resources, e.g., declared emergencies, the Project HSE staff will assist the Contractor in obtaining additional equipment and personnel (at the Contractor's expense) to proceed with spill containment and clean-up and supervise these activities. The equipment may be supplied by external contractors or by Vale (especially for remote locations). External contractors must be approved to work on Vale sites.

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5.3.4 Spill Response and Clean-up

After the notifications, the Contractor's personnel may proceed to clean-up spills themselves under the following conditions:

- The material is known; If not, identify material being spilled and understand the hazards. Material may be flammable, corrosive, oxidizing material, etc.
- The individuals have received appropriate WHMIS and spill training, and have an understanding of the hazardous nature of the material;
- The release is relatively small (<10L) and clean-up is manageable with nearby Contractor resources;
- The spill does not affect areas outside their designated work area;
- The spill did not affect natural watercourses;
- The spill did not cause damage to existing infrastructure or Vale property;
- The individuals have appropriate personal protective equipment and use it; and,
- The collected hazardous materials and other potentially contaminated materials will be properly package, labeled, and disposed of.

All spills shall be cleaned up at the Contractor's expense and to the satisfaction of the Project's HSER Supervisor. Best practices for spill clean-up include, but are not limited to the following:

- Use additional resources/equipment as needed (which may be obtained from external resources, if needed) to completely contain spill (soil berming, dyking, ditching, etc.);
- Use sorbents to absorb spilled fluids (generally loose spill control material should be placed over the entire spill area, working from the outside, circling to the centre to reduce the chance of splashing and/or spreading);
- Use appropriate shovel, scoop or pumping equipment to capture spilled material and store captured material into temporary holding tanks or containers;
- If on water, limit the spread in watercourses by booming, absorbent socks, skimmers and collection at an accessible containment location. Pump any impacted surface water into temporary storage tanks;
- Remove impacted materials and place at a designated area or into marked containers for subsequent disposal at an approved waste facility; and,
- Collect any contaminated soil and vegetation and store in a weather-protected area for disposal. (Note: If the severity of the spill requires below grade excavation, it will be necessary to identify, isolate and eliminate any underground service hazards and a NAPG excavation permit will be required.)

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- Dispose of the waste material properly. Follow the requirements of the *NAPG Waste Management Plan*. Ensure the disposal containers are properly labeled and sealed. Waste may be stored for up to 90 days in a designated waste storage site.



5.3.1 Remediation and Restoration

The Contractor shall undertake corrective measures, site remediation and restoration measures as directed by the NAPG HSER Manager. These may include:

- Remediate the area of the spill until all liquid product (including petroleum products) and contaminated water has been recovered. Load recovered liquid product and contaminated water into suitable drums or tanks for treatment or disposal.
- Load the impacted soil into drums or containers for disposal.
- All waste generated from a spill must be transported and disposed at a facility approved to receive the spill waste. Recovered liquids and solids may need to be disposed of separately. The licensed waste transport system (carrier) and the waste receiving facility are required to operate under appropriate permits that specifically authorizes the transportation or receiving of the specific waste stream.
- Sampling may be required to ensure that all contaminated soil, water and sediments are removed. For any NAPG projects testing may be arranged through the host site's Environment group.
- Following remedial activities, any affected areas must be returned to at least original conditions from before the spill occurred. Backfilling the area of the excavation with clean granular material may be allowed. Based on the size of the area, proper compaction of the imported fill material may be required.
- Only TDG trained and authorized project team personnel may sign provincial manifests for waste being transported off-site for disposal. Consultation with the Vale or Project environmental staff is required.
- Contact a project HSE staff to discuss final inspection after clean-up has been completed.

Contractors may be required to undertake environmental sampling and analysis may at their expense. Sampling will be conducted for media potentially affected by the spill including soil, sediment, surface water and groundwater on a "site specific" basis.

Where environmental impacts remain following initial clean-up activities, the Project and the Contractor will design and coordinate additional remedial activities such as soil excavation and disposal.

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In certain cases an area may need to remain closed for construction activities until testing, cleaning or remediation are performed. The Project may require announcements, barricades and signage at the site to prevent unauthorized access. Restricted access will remain in place until remediation has been completed in accordance with regulatory and project requirements.

5.3.2 Hydrocarbon Spills (Fuels, Lubricants, etc.)



This section provides further guidance for spill response involving hydrocarbon spills (oil, gasoline, diesel, lubricants, etc). This guidance is **in addition** to spill requirements listed above.

GENERAL SAFETY

- Flammable/combustible material; may be ignited by heat, sparks or flames. Refer to the Safety Data Sheet for the spilled substance, when assessing the hazard of the material.
- Petroleum hydrocarbons may also present inhalation and contact risks to humans. Use appropriate personal protective equipment (PPE) including gloves, protective clothing, eye and face protection, and respirator with appropriate cartridge. Specialty safety equipment may be required depending on the severity of spill and material spilled.
- Ensure area is well ventilated and consider action only if safety permits.
- Use only the proper tools and equipment in safe working condition. Non-sparking hand tools are required for use in petroleum remediation. Only qualified and trained operators are permitted to operate machinery.
- A vacuum truck may be required to remove any pooling free liquid or contaminated water in the event that surface water or shallow ground water has been impacted by the spill. If the spilled material has soaked in to the ground, excavation of contaminated soil may be required. Any contaminated snow/ice along with soil should be removed.
- During clean-up, flammable vapours may accumulate in closed containers.

INITIAL RESPONSE

- **Assess** the situation from a safe location upwind of the spill. In the event of a large spill, it may be necessary to contact the Fire Service to have them on-site to apply foam as a preventive measure to avoid fire and explosion.
- **Identify** the source of the spill (broken line, over filling, damaged equipment, leak, etc.).
- **Stop** the spill at the source if possible. Determine the amount released and the areas of impact. Control any possible sources of ignition and ventilate the area if possible. Isolate

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and secure the area to prevent unauthorized personnel from entering. If the material is spilling from a filling nozzle and the pump shut-off is not accessible, it may be necessary to shut off power at a remote switch or breaker.

- **Contain** the spilled material in a manner suitable to prevent the spill from migrating further (place booms on surface water, apply absorbent in areas where free product exists, hand dig a shallow berm to minimize migration). Attention should be given to preventing the spilled material from entering drains or waterways.
- Mobilize additional resources if required through the Project HSE staff.
- Vale Environment personnel familiar with local regulations shall decide whether to report releases of fuels and other petroleum products to authorities.



CONTAINMENT, CLEAN-UP AND DISPOSAL

Small spills (<10L):

- Use on-site personnel and available spill kit supplies to clean up the spilled material. Apply absorbent material from the perimeter of the spill inward, covering the total spill area. Allow time for liquid/spilled material to be absorbed then use a broom and shovel (spark resistant) to mix and turn absorbent to ensure complete saturation. Transfer the spent absorbent and deposit it in an empty drum or container for disposal (Use UN certified containers if applicable).
- Never use a vacuum cleaner or Shop-Vac to clean up flammable material spills or debris because contact with the motor could start a fire.
- Never hose down a spill or leak with water unless there is an imminent risk of fire.
- Thoroughly ventilate the area during and after the clean-up.
- Clean concrete surfaces with detergent and water after the spill clean-up.

Medium and large spills (10L to 100L and >100L):

- Depending on the severity of the spill, outside authorities may need to be involved (i.e., fire department, police, municipal officials, etc.). At any time the project HSE staff can be contacted for additional assistance with containment / clean-up protocol.
- Where pooling free liquid is a concern, a berm can be constructed around the spill with spill response materials or soil (using non sparking tools and equipment) to prevent the spilled material from spreading. If fluids have spilled or leaked on an impermeable surface, such as a road or parking lot, locate the nearest down gradient storm drain and berm or cover the drain to prevent fluids from entering.

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Waste Handling:

- Some Vale sites or projects may have a landfill permitted to accept petroleum impacted soil within specified limits. Appropriate Vale manifest documents must be filled out and signed by a Vale contact. For volumes greater than specified limits an alternate licensed waste disposal company is required to accept the waste

6.0 LEARNING AND COMPETENCE

6.1 Project Orientation

Each project will provide orientation training for all personnel/contractors regarding the minimum requirements for occupational health, safety and environmental protection (OHSE) to access the site. Contractors will provide any additional OHSE training for their employees for their specific work on the project. Emergency and spill response are key components of OHSE training.

6.2 Specific Environmental Training

The host site’s or closest Operations Environment Department may conduct a “train the trainer exercise” for spill practices the project must adopt.

The Project will ensure that all project personnel are appropriately trained in the prevention and management of spills and that designated staff and contractors are trained in spill prevention and response including the operation and maintenance of clean-up equipment.



Contractors shall provide training to their employees regarding hazardous material handling and basic spill prevention measures and spill response training related to their work on the project.

Topics shall include:

Materials

- Proper handling and storage of all materials brought on site or used by contractors (including handling of hazardous wastes);
- Use of Safety Data Sheets (SDS) and the Workplace Hazardous Materials Information System (WHMIS);
- Requirements for the proper handling of fuels, e.g, TSSA Liquid Fuels Handling Code in Ontario;

Spill Prevention, Spill Response

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- Types of potential spills and releases;
- Spill prevention measures;
- Spill control and clean-up procedures for spills;
- Information on location of emergency response equipment and specifically spill response equipment;
- Proper use of spill kits;
- Transportation of Dangerous Goods (TDG); and,
- Notification procedures.

Factors that can complicate spill response include spills involving multiple chemicals, and highly volatile or toxic materials spilled in poorly ventilated areas. Personnel using highly volatile or toxic materials and/or working in poorly ventilated areas must be trained in appropriate actions for these complications.

Prior to commencement of work, Contractors shall ensure that all training has been completed and documented in writing. Records of staff training must be available before the PMRA to the Project Team.



If a project site is subject to E2 plans, SPCP requirements (Ontario) or stores large quantities of hazardous materials, the project may be required to conduct or participate in emergency drills or table-top exercises to practice spill and emergency procedures.

7.0 COMMUNICATION AND REPORTING

7.1 Summary of Notifications and Reporting

In the event of a spill or other unplanned release, the following notification and reporting actions are required:

- **First person to observe spill:**
 - Assess situation and address any immediate hazards or injuries;
 - If safe to do so stop the source of the spill;
 - **Notify Supervisor and Contractor Environmental Representative.**
- **Contractor**
 - **Notify Project HSE representative;**

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- Contain and clean-up following spill response procedures. Follow direction of Emergency Responders, if required;
- **If directed by Vale, report spill to external authorities**
- **Conduct an incident investigation. Prepare a written formal review, including root causes, corrective actions to prevent recurrence, description of site remediation/restoration measures.**
- **Project HSE Representative**
 - **Notify external authorities if required by this procedure.**
 - **For all brownfield projects, notify the Vale Operations Environment Representative.**
 - **In consultation with Project Management and Vale Operations, if applicable, activate an Emergency Response, if required.**
 - Assist Contractor in obtaining required containment and clean-up resources. Supervise clean-up activities.
 - **Maintain ongoing communications with Project Management, authorities, and Contractor as necessary.**
 - **Participate in the incident investigation and review follow-up actions.**
 - **Enter incident into SAP-IM and maintain accurate records.**
 - Confirm site has been remediated to pre-spill conditions.
- **Vale Operations Environment Representative** (projects located within a Vale operating site)
 - **Determine if spill is reportable to authorities using existing processes. Assess whether the contractor, the Vale project team or Vale operations reports the incident to authorities. Advise the Project and Contractors as required.**

7.2 Internal Reporting Requirements

All notifications that a spill has occurred or is imminent must be made “forthwith”, meaning as soon as practical after the immediate response is initiated, e.g, safety hazards, injuries, and stopping the spill source. It is not necessary to have all the details before notifying supervision, the project or Vale Operations. Make follow-up calls as new information becomes available.

The Contractor shall provide the Project with the necessary information for Vale’s SAP IM reporting system. Required information at the time of notification includes:

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Document is valid only on the date printed

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- contractor name and contact information;
- date, location, start and end time of spill;
- material released including constituents, concentrations, known hazards, etc. (refer to SDS);
- amount of material released (or rate of release if not available);
- whether material is considered toxic (refer to SDS) and under what regulation;
- area(s) affected by release (e.g. confined, water way, off-property areas, etc.);
- immediate cause of release (or steps being taken to determine cause if unknown);
- any other pollutants that may be discharged as a result of the circumstances of the discharge/spill (i.e. chemical reaction between original pollutant released and stored chemicals in the area); and,
- a description of clean-up/corrective actions already taken or planned.



The projects shall establish an “on-call” process so that spills and other environmental incidents may be reported to a Project HSE representative on a 24/7 basis.

All internal reporting of spills and other unplanned releases must follow the NAPG Incident Reporting and Management Procedure (NAPG-SAF-SPI-0004).

A formal review of spills and serious near misses will be started as soon as practicable after occurrence and will be attended by the Project’s HSE Representative, Vale Operations Environment Department (if applicable) and any related contractors. The Contractor must prepare a written formal review about the spill for the review and approval by the Project’s HSER Manager and for tracking by the Project in the SAP IM Incident Reporting system.

The contractor’s written formal review shall include:

- a description of the spill incident,
- parties involved;
- investigation details and findings;
- immediate actions taken to stop the spill and contain spilled materials, including notifications,
- conclusions with root cause/s of the spill,
- any risk assessment and corrective actions to prevent recurrence, including assignment of actions and timelines,

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- site remediation/restoration measures implemented or to be completed including the effectiveness of measures.
- Sampling results, including evidence that site has been restored to pre-spill conditions.

The Project HSE Representative shall enter the spill details in SAP-IM, including the contractor’s report, and provide summary information for the project performance metrics and reports.

The Project may also audit for completion of follow-up actions and documentation.

7.1 External Reporting Requirements

For greenfield projects the Project HSE Representative shall review the circumstances of the spill and determine whether to notify external authorities and who should make the notification. Obtain Vale legal advice if possible. Normally Vale will notify external authorities. However, the contractor may be asked to notify depending on circumstances.

For brownfield projects where the project is being built within an existing Vale operation, the Vale Operations Environmental Representative shall review the circumstances of the spill and determine whether to notify external authorities and who should make the notification. Obtain Vale legal advice if possible. The project or the contractor may be asked to notify external authorities.

All spill reports to external authorities must follow reporting process in the project’s jurisdiction, e.g. Spills Action Centre in Ontario. Delays in reporting spills to authorities may be subject to penalties or prosecution. The Project team may be required to provide a copy on any spill report to external authorities.



Vale will designate a company spokesperson who will be responsible for coordinating all communications with the media as needed.

The project shall investigate all community complaints indicating a potential spill and initiate a response if required.

8.0 RECORDS

Vale shall retain SAP records (for a minimum of 5 years) and formal reviews for both spills that are reported to external authorities and those that are not reported.



Vale may maintain other records that include spill information such as Project performance reports, environmental audits and logs of community complaints.

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9.0 REFERENCE



- Canadian Environmental Protection Act;
- Fisheries Act;
- Transportation of Dangerous Goods;
- Canada Shipping Act;
- Ontario Environmental Protection Act, RSO 1990;
- Ontario Water Resources Act, RSO 1990, Chapter O.40;
- Ontario Technical Standards and Safety Authority, Liquid Fuels Handling Code;
- O. Reg. 224/07: Spill Prevention And Contingency Plans;
- Manitoba: The Dangerous Goods Handling and Transportation Act;
- Newfoundland and Labrador: Environmental Protection Act;
- NAPG HSE Plan (NAPG-SAF-SPI-0005)
- NAPG Environment Plan (NAPG-ENV-SPI-0001)
- NAPG Incident Reporting and Management Procedure (NAPG-SAF-SPI-0004)

DOCUMENT END

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Appendix A

Sample Equipment Inspection Checklist

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Blank Form – to be filled in

Area Supervisor:

Date:

Qty Req'd	Item	Qty	Location	Accessibility	Condition	Last test date	Expiry date or replacement notes

Comments:



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Example Form – Hazardous Material Storage Area

Area Supervisor: *Name*

Date:

Qty Req'd	Item	Qty	Location	Accessibility	Condition	Last test date	Expiry date or replacement notes
1	20 lb fire extinguisher	1	Wall mount	Accessible	Good	5-May-2012	1-Mar-2019
2	Absorbent rolls	2	Spill kit box	Accessible	Good	N/A	N/A
2	10' sorbent sock	2	Spill kit box	Accessible	1 Good, 1 Fair – yellow colour, likely absorbed moisture	N/A	Replace 1 since discoloured
100 L	Loose bulk sorbent flakes	1x100L container	Beside spill kit box	Accessible	Good - nearly full	N/A	Check qty next month & see if replacement req'd
10	Sorbent pads	5	Spill kit box	Accessible	5 missing/used	N/A	Order at least 5 more
4	Sorbent pillows	2	Spill kit box	Accessible	2 missing/used	N/A	Order at least 2 more
1	Epoxy filler	1 tube	Spill kit box	Accessible	Good	N/A	1-Sept-2014
1	Drain cover	1	Spill kit box	Accessible	Good	N/A	N/A
1	Shovel	1	Storage room	Blocked	Good	N/A	N/A
1	Mop	1	Storage room	Accessible	Good	N/A	N/A
1	Broom	1	Storage room	Accessible	Good	N/A	N/A
3	Containers with lids	3	Storage room	Blocked	Good	N/A	N/A
3	Disposal bags	3	Spill kit box	Accessible	Good	N/A	N/A
2 pair	Nitrile gloves	2	Spill kit box	Accessible	Good	N/A	N/A

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2 pair	Protective glasses	<i>2</i>	<i>Spill kit box</i>	<i>Accessible</i>	<i>Good</i>	<i>N/A</i>	<i>N/A</i>
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Comments: *Ordered 5 sorbent pads, 5 sorbent pillows and 1 sorbent sock. Reorganized storage room to ensure empty containers and shovel are accessible/*