

NorthwestTel Inc. Fuel Spill Emergency Response Action Plan

This site is equipped with a fuel tank storage system. Although our fuel system is built to prevent incidents; a spill or leak incident may occur. The primary objective is to contain fuel and prevent further environmental impact.

IN THE EVENT OF A SPILL OR LEAK TAKE THE FOLLOWING ACTIONS

Report incident immediately to NOCC (867-920-3535) and provide the NOCC operator with a preliminary assessment of the source, type and extent of the spill/leak.

NOCC will report to Bell Enviro-Line and will report to the officer-on-duty, updating as the situation evolves.

Bell Enviro-Line number is 1-877-235-5368 (24 Hours)

Immediate Action Plan – SAFETY FIRST

Priority #1 Identify source and assess hazard

- Eliminate all ignition sources (no smoking, flares, sparks or vehicle engines)
- Ensure safety of all people in the vicinity, including yourself (See First Aid table below)
- Assess hazards from the spill/leak
- Close off affected area and keep unauthorized personnel away (300m)
- Stay upwind and keep out of low areas
- If spill/leak is located inside building then ensure area is well ventilated before entering

Priority #2 Stop flow of the spill/leak (EMERGENCY SPILL KIT INTERVENTION)

- Ensure that all Protective Equipment is worn
- Stop flow of the spill/leak at the source
- Attempt to limit immediate spread of spill/leak using dike material. Prevent off-site migration and prevent entry into waterways, floor drains or confined areas

Priority #3 Notify and Update NOCC

- Note the source, volume of the spill and provide details regarding any fire risk or first aid response
- Confirm that spill is within onsite spill response capability
- Ensure that notification to external stakeholder is done and help is on its way
- First Responder must remain on-site until relieved by the authority of NOCC, Environmental Services, or ITIL Situation Manager

Priority # 4 Spill Containment

- Use onsite **EMERGENCY SPILL KIT** and follow enclosed instructions
- For large spill/leaks build a dike far ahead of liquid spilled

Priority # 5 Spill Recovery and Clean-up

- For small spill/leaks which have been successfully contained onsite, commence spill clean-up operations. Large spills may require assistance from specialized contractors.
- If applicable, ensure all soiled material placed within **EMERGENCY SPILL KIT** is properly disposed of at authorized collection points (Whitehorse, Ft. Nelson & Yellowknife Compounds)
- Notify manager/supervisor of incident details and corrective actions

REMEMBER: SAFETY FIRST!

| Health Considerations | First Aid Response (In the event of injury) |
|---|--|
| <ul style="list-style-type: none"> - Inhalation or contact with hazardous and contaminated materials may cause irritation/burns to skin and/or eyes. - Vapors may cause dizziness or suffocation. | <ul style="list-style-type: none"> -Move victim to fresh air. -Give artificial respiration if victim is not breathing -Remove and isolate contaminated clothing and shoes -Keep victim warm and quiet -Ensure that medical personnel are aware of the material(s) involved in the emergency |

1.0 ENVIRONMENTAL PROTECTION

1.1 Introduction

ATCO Structures's management has developed the following concise statement of corporate environmental policy to provide guidance to employees at all levels of the organization.

ATCO Structures is committed to protecting the environment while carrying out its business activities by meeting or surpassing legislated standards, while meeting contractual terms of reference.

In keeping with this commitment to the environment, ATCO Structures will carry out its operations to prevent or minimize the potential environmental impacts associated with contracted activities.

1.2 Potential Environmental Impacts

Table 1 lists the potential environmental impacts associated with contracted activities and the respective preventive measures and mitigation/contingency procedures that ATCO Structures will undertake.

Following Table 1 is a Spill Contingency Plan. This plan establishes policy, responsibilities and instructions for response to fuel spills which may occur at NorthwesTel sites during activities.

The spill contingency plan is consistent with the requirements and provision of ATCO Structure's Corporate Environmental Policy.

The purpose of the plan is:

- a. To provide a clear statement of procedures which will be carried out in response to fuel spills;
- b. To minimize the potential environmental impact of fuel spills by establishing pre-determined responses and plans of action;

- c. To establish a state of preparedness for personnel through a fuel Spill Response Training Program;
- d. To protect the health and ensure the safety of:
 - i. Personnel involved in fuel spill response activities; and
 - ii. the environment
- e. To provide a reporting service for the fuel spills;
- f. To ensure site environmental restoration through appropriate remedial activities; and
- g. To identify the roles and responsibilities of all parties involved in fuel spill response activities.

TABLE 1
EVALUATION OF POTENTIAL ENVIRONMENTAL HAZARDS

| ACTIVITY | AREAS AT RISK | POTENTIAL HAZARDS | IMPACTS (refer to legend for explanation) | PREVENTIVE MEASURES | MITIGATION/ CONTINGENCY PROCEDURES |
|--------------------------------------|--------------------------|---|---|--|---|
| Site fuel distribution | Site | - fuel line leak or break | birds, fish, mammals (2), water quality | - Preventive and predictive maintenance - Recurrent awareness education. | - contingency procedures |
| Tanker Truck Fuel Resupply/ Transfer | Transport routes | - truck accidentally overturns - tanker damaged/ruptured - hose/fittings/connectors leak - tank overflow | birds, fish, mammals (2), water quality | - Operation by qualified personnel - Preventive and predictive maintenance - Adherence to approved SOPs - Recurrent training/ awareness ed. | - Spill response contingency training - On-site simulation practice - Adequate stock of sorbent materials - Contingency procedures |
| Helicopter Fuel Resupply | Site Transport routes | - plane crash/ accident - hose/fittings/connectors leak - rupture of fuel bladder | birds, fish, mammals (1 & 2), socio-economic, water quality | - Operation by qualified personnel - Preventive and predictive maintenance - Adherence to approved SOPs - Recurrent training/ awareness ed. | - Spill response contingency training -On-site simulation practice -Adequate stock of sorbent materials -Contingency procedures |

Legend of impacts:

| | |
|----------------|--|
| Birds | Contamination of feeding/staging areas by fuel spill |
| Fish | Poisoning damage to adults or spawn from fuel spill into habitat |
| Mammals (1) | Inadvertent disturbance of animal activities especially at seasonal concentration or migration areas |
| Mammals (2) | Injury to animals due to water pollution and oil spills |
| Socio-economic | Disruption of fish or wildlife resource base |
| Water quality | Contamination of water by spills |

1.3 Spill Contingency Plan

1.3.1 Initial Response Procedures

The first priority during any emergency or incident is to ensure the safety of all personnel in the area. The person who detects a spill or leak will, while ensuring their personal safety, first try to stop the flow at its source and then briefly report the following details to the NOCC, who will in turn contact the ATCO Structures Operations Supervisor and Project Manager:

- a. Product spilled;
- b. Volume of spill;
- c. Location of spill;
- d. Cause of spill;
- e. Status of spill (i.e. terminated or continuing);
- f. Extent of any contaminated areas;
- g. Factors affecting the consequences of the spill or the ease of recovery e.g. terrain, temperature, wind, precipitation, buildings involved, other products nearby);
- h. If the spill is along a waterway or lake: location, characteristics (i.e. high or low energy) and length of shoreline contaminated;
- i. Extent of containment achieved, naturally or artificially;
- j. Projected hazard to people, property and the environment;
- k. Action taken or proposed to contain, recover, clean-up; and
- l. Outside assistance required, if any.

The ATCO Structures Operations Supervisor will direct efforts to halt, contain and minimize the effects of the spill. As soon as the situation permits, the ATCO Structures Project Manager will advise the NorthwesTel Property Manager, and the ATCO Structures Operations Supervisor will advise the designated NorthwesTel Environmental Officer of the following:

- a. Name and phone number of the spill reporter;
- b. Time of the spill or leak;
- c. Type and volume of product spilled or leaked;
- d. Location of the spill or leak;
- e. Source of the spill or leak;
- f. Owner of the product and phone number;
- g. Whether the spill or leak is still occurring;
- h. Whether the spilled or leaked product is contained and, if not, where it is flowing;
- i. Clean-up efforts being made; and
- j. Weather conditions and terrain at the spill site including:
 - i. Wind velocity and direction;
 - ii. Temperature, precipitation, snow cover;
 - iii. Proximity of the spill to water bodies, wells, water intakes or buildings;
 - iv. If the spill is on land: the type of soil (e.g. bog, sand); and
 - v. If the spill is on water: depth, wave height and current behaviour.

The NorthwesTel Environmental Officer will notify the 24-Hour Spill Report Line, Environment Canada and the CEO NorthwesTel.

1.3.2 Recovery and Clean-Up Procedures

The ATCO Structures Project Manager and Operations Supervisor; and the NorthwesTel Property Manager and Environmental Officer will assess site conditions and the probable environmental impact of the various clean-up and recovery procedures with 24-Hour Spill Report Line, Environment Canada. The proposed solution will be made in consultation with NorthwesTel.

The decision criteria used will be to minimize:

- a. Danger to personnel;
- b. Migration of contamination; and
- c. Area and degree of disturbance to land and water.

If fuel recovery is practicable, available ATCO Structures and/or NorthwesTel personnel will be mobilized to move pumps and empty drums to the spill area. Containment dykes will be built if necessary, and the fuel will be pumped into drums. Any recovered fuel will be transferred to an approved disposal site.

Whether a POL spill has occurred on concrete, asphalt, soil, water or snow, the general procedures for recovery and clean-up will be as follows:

- a. Take safety precautions and avoid personal contamination;
- b. Prevent non-essential personnel and vehicles from entering the contaminated area;
- c. Contain the POL to prevent migration using absorbent material or dykes, as appropriate;
- d. Retrieve the POL, using sorbent material, pumps, or shovels, as appropriate;
- e. Clean the immediate area using sorbent material, rags, water, solvents or dredges as appropriate;
- f. Remove the surface area past the level of contamination, where recommended by applicable environmental agencies (24-Hour Spill Report Line, Environment Canada and Pollution Division, GNWT); and
- g. All contaminated cleaning and containment material, sorbent material, retrieved POL, and contaminated soil or surface material in labeled drums or appropriate bags for disposal at an approved facility.

All necessary personnel and resources, including heavy equipment, will be deployed in the clean-up as supplied by NorthwesTel. If on-site equipment is inadequate, additional containment or clean-up equipment and additional personnel will be requested.

Notwithstanding the foregoing, clean-ups may be minimal if the appropriate government agency determines that a clean-up will cause greater environmental damage than no clean-up.

1.3.3 Follow-Up Procedures

The ATCO Structures Operations Supervisor will ensure:

- a. All contaminated debris, sorbents and cleaning material are disposed of in accordance with approved procedures after the necessary permits are obtained;
- b. Any outdoor spill areas disturbed by clean-up activities are assessed and appropriately treated, when required;
- c. Outdoor spill areas are mapped and their boundaries staked to facilitate monitoring and treatment; and
- d. bodies of water are monitored for hazmat contamination as required by environmental agencies.

The NorthwesTel Environmental Officer will provide an environmental incident report for significant spill incidents, indicating cause of spill, action taken and any follow-up action required.

1.3.4 Spill Response Kit

Spill response kits will include part or all of the following materials as appropriate to the site or refueling operation:

- a. Sorbent products;
- b. Plastic, polyethylene;
- c. Plastic bags;
- d. Shovels;
- e. Gloves, rubber lined;
- f. Rope, polypropylene;
- g. Flammable liquid pump;
- h. Pitchfork; and
- i. Salvage drums.

FIGURE 2: EMERGENCY CONTACT LIST

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|---|----------------|
| 24 Hour Spill Report Line for NWT | (867) 920-8130 |
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| Yukon Spill Report Center | (867) 667-7244 |
| | |
| British Columbia Provincial Emergency program | 1-800-663-3456 |
| | |
| NorthwesTel NOCC Center | (867) 920-3535 |
| ATCO Frontec Project Manager | (867) 335-1804 |
| ATCO Frontec Operations Supervisor | (867) 335-1398 |
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