Spill Response Plan

WORK PLAN

Tower Arctic LTD.

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Submitted From:	Tower Arctic LTD.
Submitted To:	Government of Nunavut, Advisian
Date Submitted:	Mai 14, 2021

Contents

1. INTRODUCTION

This document is a general contingency plan in case of accidental spill of hazardous materials in the environment. This document is presented as part of the Pond Inlet Marine Infrastructure, by the company Tower Arctic LTD.

This document demonstrates the organization that structures the environmental procedures that Tower Arctic LTD. will execute in case of an accidental spill of hazardous material happens in the environment.

2. PEOPLE RESPONSIBLE

Table 1: List of managers of the environment

TITLE	NAME	PHONE NUMBER
Project Director	Simon Goulet	418-955-3068
Project Manager	Simon Brochu	418-563-1128
Assistant Project Manager	Alexandre Beaumont	581-397-6437
Superintendent	Alain Fortier	418-930-2598
Day Shift Foreman	Mikaël Aubin	418-561-9554
Night Shift Foreman	Normand Ringuette	418-554-1712
Environmental Coordinator	Olivier Bédard-Richard	418-953-3781
On site Environmental Monitor	Sara Dubosq	514-214-9075

3. COMMUNICATION PATTERNS

The communication patterns are shown in **Appendix A** and will be posted in the following area:

- In all Tower Arctic office trailers

4. INVENTORY OF HAZARDOUS MATERIALS STORED ON SITE

The layout of hazardous materials is submitted in the **Appendix B**:

- Fuel Truck 20 000L (diesel fuel)
- Mobile tank 2 000 liters (diesel fuel)
- Mobile tank 2 000 liters (gasoline)
- Support for gas bottle (acetylene, oxygen, propane)
- Various types of hydrocarbons (oil, grease)
- Explosive materials (packaged emulsion, booster, detonating cords)

The next table lists the minimum mitigation and monitoring measures for the project:

Table 2: Mitigation and monitoring measures for the hazardous materials

Reference #	Requirement
Hazardous Materials Measures	
HM01.	Ensure staff are trained and qualified to safely handle the hazardous waste and materials.
HM02.	Hazardous waste and materials shall be stored a minimum 31 m distance from high water mark of any waterbody or identified sensitive environmental area (as identified through permitting, during pre-construction surveys [if required] or by the EI or EM).
HM03.	A suitable container, based on the properties of the waste or materials to be stored, shall be selected: hazardous materials shall be stored in their original containers, where possible, or in containers specially manufactured for the purpose of storing a specific hazardous waste or materials.
HM04.	Containers used for hazardous waste and materials shall not be used for non-hazardous waste types.
HM05.	All hazardous waste and materials shall be stored on a firm working surface that is impervious to leaks.
HM06.	All hazardous waste and materials shall be stored within a container which has at least 10% more capacity than the total volume of substances to be stored, and is inaccessible to wildlife.
HM07.	Drainage into and from the storage area shall be controlled, and/or suitable secondary containment implemented, to prevent spills or leaks from leaving the site and to prevent run-off from entering the site.
HM08.	Containers shall be sound, sealable and not damaged or leaking.
HM09.	Containers shall be closed and sealed at all times, except while materials are being added or removed.
HM10.	All hazardous waste and materials shall be classified and labelled – containers must be clearly labelled to identify their contents according to requirements of the WHMIS and the relevant Transport Authority.
HM11.	All hazardous waste and materials containers shall be accompanied by the Material Safety Data Sheet (MSDS) or have the MSDS on file available.
HM12.	Incompatible waste and materials shall be stored in a manner that contact, in the event of a spill or accidental release, is not possible (i.e. corrosive materials must be kept away from flammable materials).
HM13.	Containers shall be placed so that each can readily and easily be inspected for signs of leakage, corrosion or deterioration. Leaking, corroded or deteriorated containers shall immediately be removed and their contents transferred to a sound container.
HM14.	Inspections of the hazardous waste and materials management shall be performed and recorded at least weekly.
HM15.	A registered hazardous waste carrier shall be used to transport the waste to a registered receiver or hazardous waste management facility if disposal is required.
HM16.	Shipping of all dangerous goods shall be registered with Government of Nunavut as detailed in Table 4-1 and appropriate shipping documents shall accompany all movements of dangerous goods.
HM17.	Records are to be maintained indicating the type and quantity of waste being stored along with the date, type and quantity of hazardous waste brought into or removed from the facility.

Tower will respect the special requirements for AN or ANFO as the Natural Resources Canada guidelines.

Table 3 provides the list of hazardous materials potential discharge during the project.

Table 3: List of potential spill scenarios according to the presence of hazardous materials

Material (sources)	Discharge volume (worst case)	Potential contamination	Worst case scenario
Diesel	20 000 L	Ground and water	Empties through a hole in the tank
Gasoline	2 000 L	Ground and water	Empties through a hole in the tank
Lubricants and oils	1 000 L	Ground and water	Empties through a hole in a container
Paint	5 L	Ground and water	Container drop
Explosives	25 kg	Ground and water	Container drop
Propane	5 m^3	Air	Valve not closed or broken
Oxy/Acetylene	5 m^3	Air	Valve not closed or broken

5. GENERAL CONTINGENCY PLAN

For Tower Arctic LTD, the speed of operations is the key element in this plan which ensures an effective response from different mobilized resources on site when an accidental spill happens.

For this reason, the marine activities (< 30 m from the most recent high water level) or terrestrial activities (> 30 m from the most recent high water level) must be coordinated while respecting the patterns of the both kind of activity.

5.1 Marine Activities

The marine activities are the construction operation which are performed in water and within 30 m from the most recent high water level. These activities are at high risk of spilling contaminants in the water. As soon as an accidental spill of a hazardous material in the environment is reported, TA will proceed with the following steps:

A. CONTROL THE LEAK

- Quickly locate the contaminant source;
- If possible, immediately neutralize the leak;
- Evaluate amount of damage on site;

B. CONFINEMENT OF SPILLED PRODUCT (MINIMIZE THE RISK OF CONTAMINATION)

If there is a spill in the water, a floating barrier made of absorbent strands will be installed using boat(s) to confine and absorb the contaminant. During ice break-up and freeze-up periods when it's not possible to navigate, the floating barrier will be placed on water using an on-land excavator and/or another heavy equipment. Cables and anchors shall be used to place and maintain the barrier.

If the spill doesn't occur in water, put up barriers to reduce spread of spilled material by laying down socks, pads or absorbent aggregate. Protect sensitive areas such as watercourses, water well sources, catch basins, and wildlife habitats.

The locations of the spill kits are shown on the sketch in **Appendix C**, this drawing is also posted in our office trailers.

C. INFORM THE PEOPLE RESPONSIBLE

Describe the incident to the superintendent and/or the project manager and fully collaborate with the participants. Inform the responsible on which type of hazardous material were currently spilled on site, the amount released, the source of the leak, the area affected, and the immediate action taken to solve the situation.

D. RECOVER HAZARDOUS AND RESIDUAL MATERIALS

- Recover the spilled material manually or mechanically as the case may be;
- Haul the hazardous and residual material to the specific container;
- Dispose of the hazardous material as per the law and good practice.

E. FILE THE ENVIRONMENTAL REPORT / INVESTIGATION REPORT

- The spill will be reported to the Environmental Inspector of the Government of Nunavut and a copy of the report will be also provided (see **Appendix D** to consult the spill report form) within 12 hours following the occurrence. The Environmental Inspector will determine in accordance with applicable regulations if an incident is reportable to regulatory agencies.
- A spill log will follow and be discussed with the Government of Nunavut.
- Proof of hazardous waste disposal will be issued at Government of Nunavut.
- TA will report to the authority (24-hour spill report line as per the Nunavut spill planning and reporting regulations) where the spill occurred, the spill amount equal to or greater than the amount set out in schedule B of the Spill contingency planning and reporting regulations (**Appendix E**).

  A spill scene checklist is developed in **Appendix F**.

5.2 Terrestrial Activities

The terrestrial activities are the construction operation which are performed at more than 30 m from the most recent high water level. As soon as an accidental spill of a hazardous material in the environment is reported, TA will proceed with the following steps:

A. CONTROL THE LEAK

- Quickly locate the contaminant source;
- If possible, immediately neutralize the leak;
- Evaluate amount of damage on site;

B. CONFINEMENT OF SPILLED PRODUCT (MINIMIZE THE RISK OF CONTAMINATION)

Put up barriers to reduce spread of spilled material by laying down socks, pads or absorbent aggregate. Protect sensitive areas such as watercourses, water well sources, catch basins, and wildlife habitats.

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- Proof of hazardous waste disposal will be issued at Government of Nunavut.
- TA will report to the authority (24-hour spill report line as per the Nunavut spill planning and reporting regulations) where the spill occurred, the spill amount equal to or greater than the amount set out in schedule B of the Spill contingency planning and reporting regulations (**Appendix E**). The Environmental Inspector of the GN will determine in accordance with applicable regulations, if an incident is reportable to regulatory agencies.

  A spill scene checklist is developed in **Appendix F**.

6. OTHER MEASURES

- TA will visually make sure the spill sites are well remediated. The sites will be pictured to show that all hazardous spilled wastes are recovered. If it cannot be confirmed visually that a spill is fully recovered, TA will prepare a remediation plan to meet the Canadian Environmental Quality Guidelines. Prior to its implementation, the remediation plan shall be submitted and approved by the Inspector of the Regulatory Agency responsible for the land. Environmental Enforcement Division of the GN has the responsibility for all spills located on Commissioner's lands, and CIRNAC will cover the lead on spills on Crown Land. The results of the implementation will be provided to the Regulatory Agency responsible for the land.
- If necessary, a company specialized in the disposal of hazardous waste will be contacted as soon as possible. Coordination and follow up of their operations will be ensured on site to enable a fast execution. Because there is no local contractor, Tower Arctic has the material (Quatrex Bags) for transport to Quebec City where the contractor listed below is located. These containment bags may be stored in our sea cans between the time of the spill and the time it gets to the specialized contractor.
- Specialized contractor:
    - Englobe Corporation 4495, Wilfrid-Hamel. Quebec. Tel 418-653-4422
- Hydraulic equipment working over/in water will use biodegradable hydraulic oil.
- If necessary, recommendations from Government of Nunavut or opinions of specialists from the Ministry of Environment and Climate Change Canada will be considered.
- During Site Safety Induction and Toolbox Meetings, TA will train its construction workers on spill prevention and spill reporting (e.g. mandatory use of spill trays and reporting immediately all spill).

Note that a complementary document on spill prevention measures is presented in ***Appendix E*** *and will be considered during the whole project.*

7. CONCLUSION AND RECOMMENDATIONS

This document has been presented to you to show the structure that Tower Arctic LTD. will put in place if an accidental spill in the environment occurs during this project.

An emergency structure and communication pattern will be developed in order to ensure a quick and efficient response during an environmental incident.

Appendix A :
Communication pattern

Specific action

Superintendent (Day Shift)
Alain Fortier Cell: (418) 930-2598

Forman (Night shift)
Normand Ringuette Cell: (418) 554-1712

GN on site/ Pond Inlet Marine Infrastructure

Justin McDonnell
Cell: 867-975-5414

ENVIRONMENTAL EMERGENCIE (1)

ENVIRONNEMENT MANAGER
Olivier Bédard-Richard
Cell (418) 953-3781

Within 12 hours after the spill occurrence

Within 24 hours after the spill occurrence

CALL
ENVIRONMENTAL
EMERGENCIES, NUNAVUT
(867) 920-8130

GN
Justin McDonell
Office: (867) 975-5414

ADVISIAN
Victoria Burdett-Coutts
Office: (778) 945-5501 / Cell: (778) 839-2372
or
Robert Crompton
Office: (778) 945-5286 / Cell: (604) 612-5144

(1) For any incident

1.1 Company Contact Details

Company Name:	Government of Nunavut, Community and Government Services
Address:	P.O Box 1000 Station 200, Iqaluit, Nunavut, X0A 0H0
Contact Person:	Justin McDonell, Project Manager, Capital Projects
Phone:	(867) 975-5441
Email:	jmcdonell@GOV.NU.CA

1.2 SPRP Distribution List

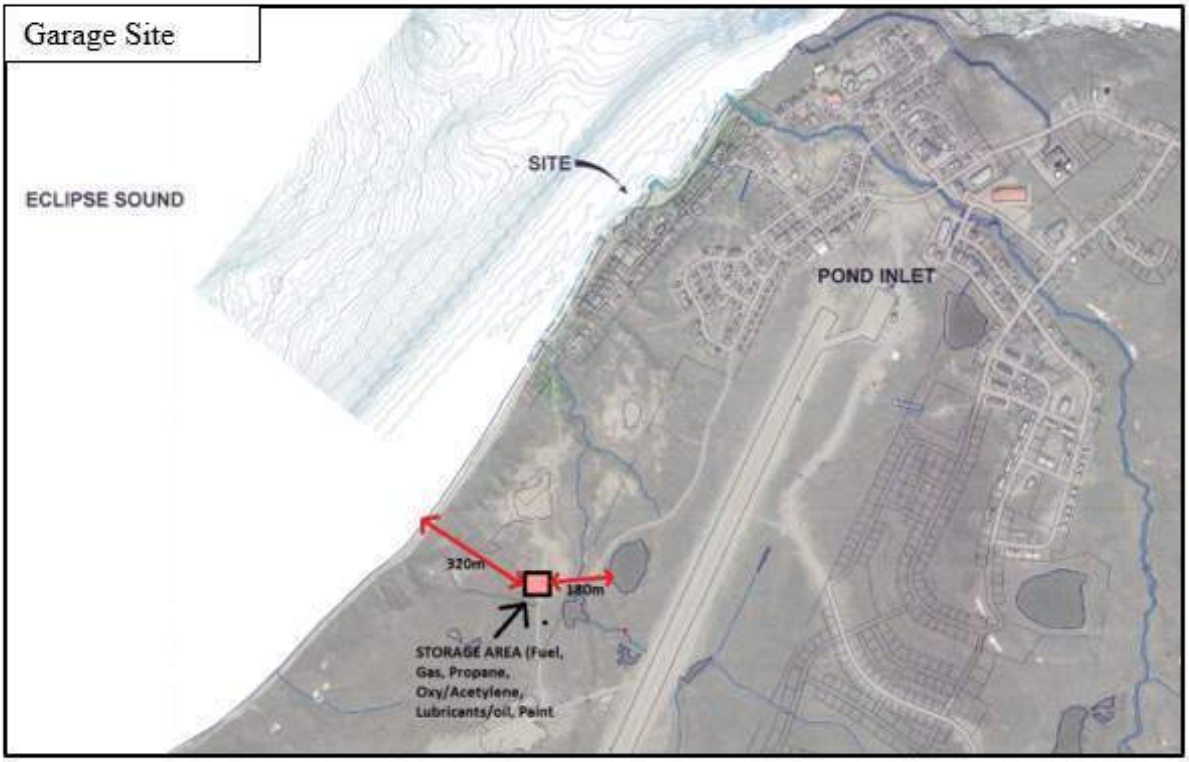
The completed SPRP will be distributed to the personnel and organizations detailed in Table 1-2.

Table 1-2 Distribution List for the Spill Prevention and Response Plan

Name	Role	Organization
John Hawkins	*Assistant Deputy Minister*	Government of Nunavut: Economic Development and Transport
Art Stewart	*Director Transportation Policy & Planning*	
Justin McDonell	*Project Manager*	Government of Nunavut: Community and Government Services
Harald Kullmann	*Project Manager*	Advisian
Victoria Burdett-Coutts	*Marine Scientist*	
Robert Crompton	*Marine Structural Engineer*	
Simon Goulet	*Project Director*	Tower Arctic Ltd.
Simon Brochu	*Assistant Project Manager*	
Alain Fortier	*Site General Superintendent*	
Olivier Bédard-Richard	*Environmental Monitor*	
Charlotte Mougeot	*Regulatory Advisor*	SRM Consulting

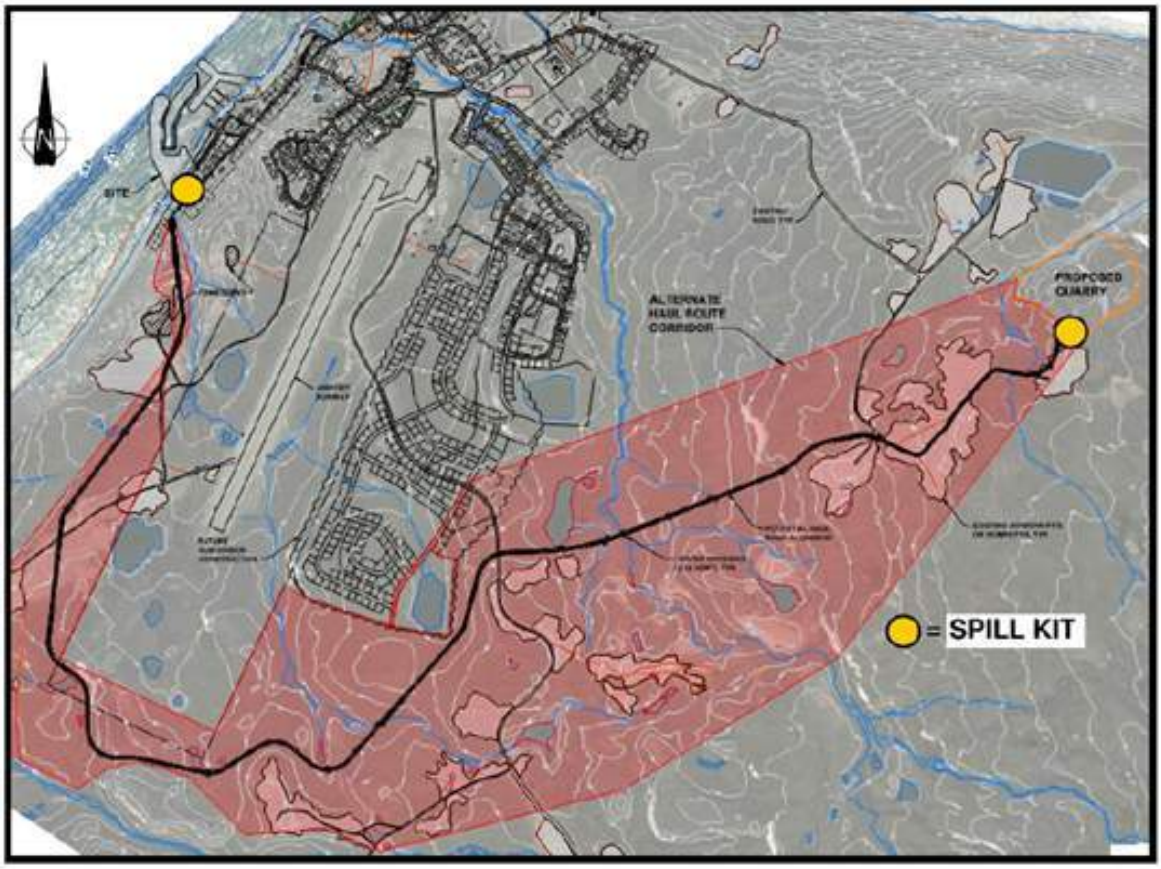
Appendix B:
Hazardous Materials Layout

HAZARDOUS MATERIALS PLAN



Appendix C:
Spill Kits Layout

SPILL KITS PLAN



*Those general spill kits will stay there permanently and there will be small kits in every truck.

Appendix D:
Spill Report Form

NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE
TEL: (867) 920-8130
FAX: (867) 873-6924
EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

A	REPORT DATE: MONTH - DAY - YEAR	REPORT TIME	☐ ORIGINAL SPILL REPORT OR ☐ UPDATE # _____ TO THE ORIGINAL SPILL REPORT	REPORT NUMBER ____ - _____
B	OCCURRENCE DATE: MONTH – DAY – YEAR	OCCURRENCE TIME		
C	LAND USE PERMIT NUMBER (IF APPLICABLE)	WATER LICENCE NUMBER (IF APPLICABLE)		
D	GEOGRAPHIC PLACE NAME OR DISTANCE AND DIRECTION FROM NAMED LOCATION	REGION: ☐ NWT ☐ NUNAVUT ☐ ADJACENT JURISDICTION OR OCEAN		
E	LATITUDE: DEGREES MINUTES SECONDS	LONGITUDE: DEGREES MINUTES SECONDS		
F	RESPONSIBLE PARTY OR VESSEL NAME	RESPONSIBLE PARTY ADDRESS OR OFFICE LOCATION		
G	ANY CONTRACTOR INVOLVED	CONTRACTOR ADDRESS OR OFFICE LOCATION		
H	PRODUCT SPILLED	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER	
	SECOND PRODUCT SPILLED (IF APPLICABLE)	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER	
I	SPILL SOURCE	SPILL CAUSE	AREA OF CONTAMINATION IN SQUARE METRES	
J	FACTORS AFFECTING SPILL OR RECOVERY	DESCRIBE ANY ASSISTANCE REQUIRED	HAZARDS TO PERSONS, PROPERTY OR ENVIRONMENT	
K	ADDITIONAL INFORMATION, COMMENTS, ACTIONS PROPOSED OR TAKEN TO CONTAIN, RECOVER OR DISPOSE OF SPILLED PRODUCT AND CONTAMINATED MATERIALS			
L	REPORTED TO SPILL LINE BY	POSITION	EMPLOYER	LOCATION CALLING FROM	TELEPHONE
M	ANY ALTERNATE CONTACT	POSITION	EMPLOYER	ALTERNATE CONTACT LOCATION	ALTERNATE TELEPHONE

REPORT LINE USE ONLY

N	RECEIVED AT SPILL LINE BY:	POSITION: STATION OPERATOR	EMPLOYER	LOCATION CALLED: YELLOWKNIFE, NT	REPORT LINE NUMBER: (867) 920-8130

LEAD AGENCY ☐ EC ☐ CCG ☐ GNWT ☐ GN ☐ ILA ☐ INAC ☐ NEB ☐ TC | SIGNIFICANCE ☐ MINOR ☐ MAJOR ☐ UNKNOWN | FILE STATUS ☐ OPEN ☐ CLOSED

AGENCY	CONTACT NAME	CONTACT TIME	REMARKS
LEAD AGENCY			
FIRST SUPPORT AGENCY			
SECOND SUPPORT AGENCY			
THIRD SUPPORT AGENCY			

Instructions for Completing the NT-NU Spill Report Form

This form can be filled out electronically and faxed to the spill line at 867-873-6924. Commencing on January 2, 2007, the form can also be e-mailed as an attachment to spills@gov.nt.ca. Until further notice, please verify receipt of e-mail transmissions with a follow-up telephone call. Spills can still be phoned in by calling collect at 867-920-8130.

A. Report Date/Time	The actual date and time that the spill was reported to the spill line. If the spill is phoned in, the Spill Line will fill this out. **Please do not fill in the Report Number**: the spill line will assign a number after the spill is reported.
B. Occurrence Date/Time	Indicate, to the best of your knowledge, the exact date and time that the spill occurred. Not to be confused with the report date and time (see above).
C. Land Use Permit Number /Water Licence Number	This only needs to be filled in if the activity has been licenced by the Nunavut Water Board and/or if a Land Use Permit has been issued. Applies primarily to mines and mineral exploration sites.
D. Geographic Place Name	In most cases, this will be the name of the city or town in which the spill occurred. For remote locations – outside of human habitations – identify the most prominent geographic feature, such as a lake or mountain and/or the distance and direction from the nearest population center. **You must include the geographic coordinates** (Refer to Section E).
E. Geographic Coordinates	This only needs to be filled out if the spill occurred outside of an established community such as a mine site. Please note that the location should be stated in degrees, minutes and seconds of Latitude and Longitude.
F. Responsible Party Or Vessel Name	This is the person who was in management/control/ownership of the substance at the time that it was spilled. In the case of a spill from a ship/vessel, include the name of the ship/vessel. Please include full address, telephone number and e-mail. Use box K if there is insufficient space. **Please note that, the owner of the spilled substance is ultimately responsible for any spills of that substance, regardless of who may have actually caused the spill.**
G. Contractor involved?	Were there any other parties/contractors involved? An example would be a construction company who is undertaking work on behalf of the owner of the spilled substance and who may have contributed to, or directly caused the spill and/or is responding to the spill.
H. Product Spilled	Identify the product spilled; most commonly, it is gasoline, diesel fuel or sewage. For other substances, avoid trade names. Wherever possible, use the chemical name of the substance and further, identify the product using the four digit UN number (eg: UN1203 for gasoline; UN1202 for diesel fuel; UN1863 for Jet A & B)
I. Spill Source	Identify the source of the spill: truck, ship, home heating fuel tank and, if known, the cause (eg: fuel tank overfill, leaking tank; ship ran aground; traffic accident, vandalism, storm, etc.). Provide an estimate of the extent of the contaminated/impacted area (eg: 10 m^2)
J. Factors Affecting Spill	Any factors which might make it difficult to clean up the spill: rough terrain, bad weather, remote location, lack of equipment. Do you require advice and/or assistance with the cleanup operation? Identify any hazards to persons, property or equipment: for example, a gasoline spill beside a daycare centre would pose a safety hazard to children. Use box K if there is insufficient space.
K. Additional Information	Provide any additional, pertinent details about the spill, such as any peculiar/unique hazards associated with the spilled material. State what action is being taken towards cleaning up the spill; disposal of spilled material; notification of affected parties. If necessary, append additional sheets to the spill report. Number the pages in the same format found in the lower right hand corner of the spill form: eg. "Page 1 of 2", "Page 2 of 2" etc. **Please number the pages to ensure that recipients can be certain that they received all pertinent documents.** If only the spill report form was filled out, number the form as "Page 1 of 1".
L. Reported to Spill Line by	Include your full name, employer, contact number and the location from which you are reporting the spill. Use box K if there is insufficient space.
M. Alternate Contact	Identify any alternate contacts. This information assists regulatory agencies to obtain additional information if they cannot reach the individual who reported the spill.
N. Report Line Use Only	**Leave Blank.** This box is for the **Spill Line's use only.**

Appendix E:
Other Prevention Measures

TDG Class	Substance for NWT 24 Hour Spill Line	Immediately Reportable Quantities
1 2.3 2.4 6.2 7 None	Explosives Compressed gas (toxic) Compressed gas (corrosive) Infectious substances Radioactive Unknown substance	Any amount
2.1 2.2	Compressed gas (flammable) Compressed gas (non-corrosive, non-flammable)	Any amount of gas from containers with a capacity greater than 100 L
3.1 3.2 3.3	Flammable liquids	> 100 L
4.1 4.2 4.3	Flammable solids Spontaneously combustible solids Water reactant	> 25 kg
5.1 9.1	Oxidizing substances Miscellaneous products or substances excluding PCB mixtures	> 50 L or 50 kg
5.2 9.2	Organic peroxides Environmentally hazardous	> 1 L or 1 kg
6.1 8 9.3	Poisonous substances Corrosive substances Dangerous wastes	> 5 L or 5 kg
9.1	PCB mixtures of 5 or more ppm	> 0.5 L or 0.5 kg
None	Other contaminants (e.g. crude oil, drilling fluid, produced water, waste or spent chemicals, used or waste oil, vehicle fluids, waste water, etc.)	> 100 L or 100 kg
None	Sour natural gas (i.e. contains H2S) Sweet natural gas	Uncontrolled release or sustained flow of 10 minutes or more

In addition, all releases of harmful substances, regardless of quantity, are to be reported to the NWT spill line if the release is near or into a water body, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable.

Appendix F:
Spill Scene Checklist

SPILL SCENE CHECKLIST

RECOGNIZE THE STATE OF THE SITUATION

( ) Evaluate the path of the product and more particularly towards the sensitive elements.
( ) Check for presence of contaminants in the hydraulic system
( ) Check the flow direction of the contaminant
( ) Check for sources, drinking water intakes or domestic or farm animals near the spill.
( ) Determine the nature of the product, the quantity and the location.

CONTROLLING CONTAMINATION AT SOURCE

( ) Locate the source of contamination as quickly as possible. If possible, neutralize it, if it is safe.
( ) Assess the extent of the damage on the ground.

TELL LOCAL RESPONSIBILITIES

( ) Notify the Superintendent General to initiate the emergency response and notify the resource persons concerned.
( ) In the event of a major spill that could reach a major drainage network, notify the Ministry of Environment and Wildlife and the municipal authorities (fire department) and call on specialized companies.

CONFINING THE CONTAMINANT

( ) Use appropriate emergency equipment: bulk absorbent material, absorbent sheets, absorbent pads, hand shovel, excavator (to make trenches if necessary).
( ) Restraint on the ground

Protect sensitive elements with absorbents

( ) Dig a retention pit to capture the contaminant
( ) Make a trench or mound to prevent the contaminant from reaching sensitive elements
divert runoff water from the contaminated area.
( ) Restraint on the water
( ) If there is a contaminant in a drainage ditch, block the culvert to prevent it from spreading.
( ) Install at the outlet of the culvert an absorbent bead on the ditch water to collect oily contaminant residues.
( ) Construct dikes or earthen dams
( ) Use booms made of bunches of absorbents, straw or trees and branches

INFORM THE AUTHORITIES CONCERNED

( ) Inform stakeholders concerned (see communication diagram)
( ) Warn the Municipal Fire Department if a contaminant spills into a manhole.

CHECK SENSITIVE ELEMENTS FOR INTERVENTION POINTS

( ) Use equipment and available personnel, or if necessary, call on specialized companies for contaminant recovery and cleaning of contaminated materials.

RECOVER CONTAMINANT

( ) Proceed diligently to recover the contaminant and call in specialized companies if necessary.

SPILL REPORT

( ) Write a report of accidental spill of contaminant and give it to the coordinator or environment officer.
( ) Make a retrospective analysis of the spill case and the procedure in place.