



Spill Prevention Control and Countermeasure (SPCC) Plan for North Kent Wind Project Project Number - 21266

Report No: 21266

Issue No: 01

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Revision History

Issue	Date	Nature And Location Of Change
01	01/09/2017	Document first created

CONTENTS

1.0	PURPOSE	1
2.0	SCOPE.....	1
3.0	REFERENCE DOCUMENTS	1
4.0	DEFINITIONS.....	1
5.0	RESPONSIBILITIES	2
6.0	PROCEDURE	4
7.0	DELIVERABLES	13
8.0	APPENDICES	13

1.0 PURPOSE

This SPCC Plan was prepared to satisfy the applicable requirements under the federal and provincial regulations and to prevent the spill and discharge of oil products (e.g., petroleum, vegetable oils) into navigable provincial waters (e.g., streams, creeks, rivers and lakes). The SPCC Plan also addresses the spill response procedures and actions that must be implemented if a spill does occur at the RES Construction site.

2.0 SCOPE

Unless specifically noted herein, this procedure shall apply to all current and future subsidiaries of Renewable Energy Systems.

3.0 REFERENCE DOCUMENTS

- 3.1 Environmental Management System, RCEMP - Link
<http://resaecm/livelink/lisapi.dll/properties/6774899>
- 3.2 Construction Environmental Plan - North Kent Wind Project,
- 3.3 Ontario Regulation 675/98 - Link:
http://www.ene.gov.on.ca/stdprodconsume/groups/lr/@ene/@resources/documents/resource/std01_079165.pdf
- 3.4 Ontario Regulation 224/07 - Link: http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07224_e.htm
- 3.5 Ontario Regulation 225/07 - Link: http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07225_e.htm
- 3.6 Environmental Protection Act RSO 1990, Chapter E.19 (Section X) - Link:
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90e19_e.htm#BK123
- 3.7 Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products -
<http://www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=61B26EE8-1&offset=14&toc=show>

4.0 DEFINITIONS

- 4.1 Regulation 675/98 - Classification and Exemption of Spills and Reporting of Discharges
- 4.2 Regulation 224/07- Spill Prevention and Contingency plans
- 4.3 Regulation 225/07 - Classification and Exemption of Spills and Reporting of Discharges

- 4.4 Act RSO 1990 (Section X) - Regulation defining spills to the environment and remediation requirements
- 4.5 Company - Renewable Energy Systems Inc. (RES)
- 4.6 Contractor - Person or Persons, firm or company, including its employees and agents or Contractors, to whom the Company has awarded a contract, which requires work to be carried out on the Company's premises or sites.
- 4.7 Contractor Representative - Person delegated by the Contractor with sufficient training and authority to act for the Contractor in matters related to the SPCC.
- 4.8 SRP - Senior Responsible Person - The person ultimately responsible for performance of the task being undertaken
- 4.9 RP - Responsible Person - The person directly responsible for performance of the specific task
- 4.10 EL - Environmental Lead - The trained, qualified individual tasked to provide oversight and direction to the RP in the performance of the task
- 4.11 Project - Within this document, the Company managed Construction site as applicable
- 4.12 RES HSQE - RES Health, Safety, Quality and Environmental Department
- 4.13 SPCC - Spill Prevention, Control and Countermeasure Plan
- 4.14 CEP - Site specific Construction Environmental Plan
- 4.15 Transporter - Any Contractor approved to transfer waste to an approved disposal point.
- 4.16 Safety Supervisor - the individual appointed by the RES SRP to supervise implementation of the RES Safety Management System (SMS) at a RES project/site/office.

5.0 RESPONSIBILITIES

- 5.1 Discharge Prevention and Reporting
 - 5.1.1 Contractor Site Supervisor - Identify the location and contents of each applicable oil storage container.
 - 5.1.2 Contractor Site Supervisor - Maintain a written copy of the SPCC Plan onsite.

- 5.1.3 **Contractor Site Supervisor, RES Project Manager, and the RES Environmental Supervisor** - If an oil spill/release occurs at the site, immediately implement the Spill Response, Cleanup, and Reporting Procedure in Appendix 4.
- 5.1.4 **Contractor Site Supervisor or Designee** - Perform and document monthly visual inspections of oil handling and storage areas, pad-mount transformers, turbines, bulk storage containers, secondary containment, piping, valves and transfer systems, temporary fueling stations, storm water features, security measures and other items - See Appendix 3.
- 5.1.5 **Contractor Site Supervisor or Designee** - Conduct and document periodic testing of company owned above ground storage tanks at least every 10 years.
- 5.1.6 **Contractor Site Supervisor or Designee** - Apply labelling and signage requirements for containers and above ground storage tanks.
- 5.1.7 **Contractor Site Supervisor or Designee** - Maintain inspections and test records for at least 3 years. Inspection and test records include routine inspections of tanks, piping, and oil handling and storage areas; leak testing of buried metallic tanks; integrity testing of aboveground containers/tanks; testing liquid level sensing devices; and integrity and leak testing of buried piping.
- 5.1.8 **Contractor Site Supervisor or Designee** - Maintain integrity testing records of bulk storage tanks after material repair.
- 5.1.9 **Contractor Site Supervisor or Designee** - Maintain tank construction/installation records, tank inspection records, and tank repair/alteration records for the life of the tank.
- 5.1.10 **Contractor Site Supervisor or Designee** - Keep records of storm water discharged from diked areas to storm drains or waters of the Province (Per SWPPP Requirements).
- 5.1.11 **Contractor Site Supervisor, the RES Project Manager, and the RES Environmental Supervisor** - If an oil spill occurs that flows off site, contact the appropriate federal, Provincial, and local agencies.
- 5.1.12 **RES EL** - Maintain a written, updated copy of the SPCC Plan on site
- 5.2 **Training**
 - 5.2.1 **RES EL** - provide documented training to all Contractors and their employees that handle oil or oil products at the site on the requirements of the SPCC Plan.
 - 5.2.2 **Contractor Site Supervisor** - provide documented training for all of Contractor's employees that handle oil or oil products at the site on the following:
 - a) Operation and maintenance of equipment required to prevent oil discharges.

- b) Proper response and actions to be taken in the event of discharge
- c) Update employees on known discharges or failures of components or equipment
- d) Applicable laws, rules and regulations relevant to oil discharges
- e) General site or facility operations and required activities

5.2.3 **RES Safety Supervisor** - Provide initial SPCC awareness training during Safety Orientation for all employees on the site spill response procedure.

5.3 Updating the SPCC Plan

5.3.1 **RES EL** - Amend the SPCC Plan if there are changes to the design, construction, operation or maintenance activities or components which affects the potential for a discharge of oil. These amendments must be timely and properly documented in the SPCC Appendix 12.

5.3.2 **RES EL** - Update the SPCC plan and site/facility diagrams and drawings as changes occur which result from the job progress, design changes or other Contractor activities.

6.0 PROCEDURE

6.1 SPCC Introduction

6.1.1 The Regulation 224/07, and 225/07 made under the Environmental Protection Act requires each individual Subcontractor to be subject to the SPCC Plan requirements due to the intended storage either in storage tanks or contained in the various construction equipment of over 100 liters of new and used oil.

6.1.2 The SPCC Plan must be available on site during normal business hours.

6.2 Conformance with Applicable Requirements

6.2.1 This SPCC Plan has been prepared in accordance with the Environmental Protection Act and the attendant regulations (as identified in the Section 3 of this procedure).

6.2.2 This site/facility will be in conformance with all applicable requirements under Section 3 through the implementation and maintenance of this SPCC Plan.

6.3 Site / Facility Description

This SPCC plan applies to a large construction project for the construction of the North Kent Wind Project and associated infrastructure located in the Municipality of Chatham Kent. The project is bounded by Bear Line Rd. on the west, Pioneer Line in the south, Center Side Rd on the east and Old Field Line in the north. The Contractor's project office and the other office and storage features are shown on the project site layout drawings which are kept in Figure 1.

6.4 Oil Products Storage

6.4.1 An oil storage area will be established at various approved storage areas throughout the site (As necessary).

- a) Aboveground Storage Tanks (ASTs) shall be positioned in such a way that the AST is protected from impact or rupture using berms or barriers.
- b) The ASTs containing oil or oil products will be properly grounded and have bonding equipment for use during fuel transfer.
- c) Alternatively, the fueling and oil product transfer process may be performed with mobile operations.

6.4.2 ASTs containing oil or oil products will be suitably labelled:

- a) AST's containing diesel fuel will be labeled "Diesel Fuel" or "Fuel Oil", include a "No Smoking" sign, and display the NFPA diamond designated: Health -, Flammability - 2, Reactivity - 0.
- b) AST's containing gasoline will be labeled "Flammable Liquid", include a "No Smoking" sign, and display the NFPA diamond designated: Health -1, Flammability - 2, Reactivity - 0.
- c) AST's or other storage tanks containing used/waste oil will be labeled "Waste Oil" and "Combustible", include a "No Smoking" sign, and display the NFPA diamond designated: Health -1, Flammability - 2, Reactivity - 0.
- d) AST's or other storage tanks containing new, unused (Virgin) hydraulic, motor, gear or other oils will be suitably labeled and have correct NFPA designators.

6.4.3 Fire Prevention - A class ABC Fire Extinguisher with a minimum 9kg rating will be located and demarcated within 20 M of the AST area.

6.5 Equipment and Storage Facilities Used on Site

6.5.1 The various Contractors potentially have the following oil product storage containers or equipment with total capacity $\geq 100\text{L}$ and the respective types and volumes of oil products they can contain at the project site.

- 6.5.2 The Contractor shall compile a register which represents a list of the equipment expected to be used on the project by this Contractor. If additional equipment is required, the Contractor Site Supervisor will modify the list and take appropriate measures to ensure that the appropriate spill protection measures are addressed. The completed listing will be kept in Appendix 10 of the SPCC which will be periodically updated to reflect changing conditions and workloads.
- 6.5.3 This Appendix will contain all Contractor listings of type, content and quantity in separate contractor-specific sections so that all equipment containing oil will be accounted for in one section of the SPCC.
- 6.6 Storage areas for oil and oil products will be established in accordance with this procedure. The location(s) will be shown on a site plan drawing and stored in the SPCC as Figure 1 and located at the end of the Appendices.

6.7 Spill Prevention Measures

The following sections describe potential and reasonable scenarios in which a release on a construction site could occur and descriptions of discharge prevention measures both specific to the associated release scenarios, and general including procedures for routine handling of products (loading, unloading, and site/facility transfers), tank designs and prevention equipment.

6.7.1 Failure of Primary Storage Container

Due to corrosion, weathering, aging, stress, vandalism, accidental impact, or manufacturer defect, a storage container could leak or completely fail causing a gradual or instantaneous release of all the containers contents. Periodic inspections and integrity testing procedures (as described in Section 6.12) have been developed to minimize the potential for these types of failure. Bulk storage tanks are designed and equipped with various features to ensure unnecessary releases do not occur.

6.7.2 Storage Tank Material Compatibility and Design

The ASTs in use at the site/facility are cylindrical in design, constructed of steel, and compatible with storing fuels like diesel and gasoline.

6.7.3 Storage Tank Secondary Containment

Contractors will confirm that ASTs storing oil products are equipped with secondary containment in the form of double-walled tanks unless otherwise agreed upon with RES. Contractor personnel will ensure good housekeeping practices are implemented when adding and removing oil from any AST to prevent oil run-off during precipitation events. Contractors will confirm that each AST is designed and constructed to meet Underwriters Laboratories, Inc. Standard UL 142 (or equivalent) for the storage of flammable and combustible liquids. In addition, Contractors will confirm that double-walled ASTs are equipped with monitoring gauges/ports (site glass) and emergency vents as required by the Standard UL 142 (or equivalent).

6.7.4 Spill Response Materials

Contractors will use spill kits to contain and/or divert inadvertent oil spills or leaks from ASTs, containers, and mobile equipment at the site. The inadvertent spills will be cleaned up immediately with the use of spill kits. The spill kits will be well-marked and accessible to all personnel provided access by RES and maintained onsite at the following locations:

- a) Office Compound and laydown yard (if separate)- 2 kg and 35 kg spill kits with containers, tarps, acid neutralizer, surplus oil sorbent/oil dry, booms, absorbent pads, and drip pans.
- b) All Contractor Vehicles - pads and/or absorbent materials.
- c) All Contractor Mobile Equipment - pads and/or absorbent materials.
- d) Contractor Mechanic's Truck - drip pan, diapers and absorbent materials.
- e) Contractor Fuel/Lubrication Truck - drip pan, diapers and absorbent materials

6.7.5 Physical Puncture, Rupture, or Overturn of Storage Containers

The nature of a construction site and the size of construction vehicles and equipment create opportunity for collisions of construction vehicles or equipment with oil storage containers. Such a collision could puncture, rupture, or overturn a storage container thereby causing a gradual or instantaneous release of the container's contents. Prudent placement and appropriate demarcation of oil storage areas, ensuring that procedures are followed for storing containers only in designated areas, and general site safety procedures are used to minimize the potential for collisions with oil storage containers. Because ASTs are equipped with or located within secondary containment, a release to the environment is unlikely; however, vehicle and mobile equipment operators are to be instructed in proper oil handling procedures to prevent releases from secondary containment.

6.7.6 Potential Operator Error during Loading/Unloading or Refueling Operations

Potential operator errors include overfilling, not disconnecting lines before vehicle departure, leaving pumps on, or fill valves left open that result in tank overflow. Operators are instructed in proper oil-handling procedures to prevent a release in appendix 2. Further, oil, hydraulic fluid, and lubricating oils/grease ASTs shall be equipped with visual liquid level indicators (e.g., sight tube or volume gauge) or high level alarms to mitigate the potential for spills resulting from inadvertent overfilling.

a) Operator Error Prevention Procedures

Prior to being assigned to oil filling/transferring tasks, Contractor employees will be trained in and will be familiar with the following Work Instructions, contained in Appendix 2:

- Work Instruction Part 1 - New Oil Product Delivery and Unloading.
- Work Instruction Part 2 - Used/Waste Oil Product Pickup and Loading.
- Work Instruction Part 3 - Refueling Mobile Equipment

b) High Liquid Level Indicators for AST

New oil, hydraulic fluid, and lubricating oils/grease ASTs are equipped with visual liquid level indicators (e.g., sight tube or volume gauge) or high level alarms. Empty containers are removed from the site or reused for used/waste oil storage.

6.7.7 Small Drips, Leaks and Spills

During routine operation and maintenance activities associated with equipment, small drips, leaks, and spills can occur. Spill prevention measures include drip pans, spill kits, and specific training for all employees handling oil containing products.

6.7.8 General Discharge Prevention Measures

The following preventative maintenance program for oil-filled operating equipment shall be implemented by all Contractors affected by this plan:

- a) Store and maintain equipment in a designated area, as appropriate.
- b) Use secondary containment (drip pan) to catch spills when removing or changing fluids.
- c) Use proper equipment (pumps, funnels, flexible hoses) to transfer fluids.
- d) Keep spill response materials readily available and properly stocked.
- e) Transfer used/waste oils to designated recycling containers.
- f) Perform regular, frequent equipment inspections for leaks and spills.
- g) Implement a policy of immediate shut down and repair, if needed.
- h) Perform preventative maintenance for equipment.
- i) Low-level indicators and alarms should be provided on hydraulic equipment.
- j) Prompt correction of all visible oil discharges.

- k) Prompt removal, clean up, and disposal of oil and oil contaminated soil and clean-up materials in accordance with local, state or federal requirements.

6.8 Temporary Storage, Protection and Disposal of Spills and Contaminated Materials

As spills are remediated the spill kit absorptive materials and the contaminated soil and miscellaneous materials will be collected in sealed, leak tight containers and transported to on-site storage for ultimate disposal. The filled containers will be identified and stored in leak tight containers (such as 20 cubic meter (30 yard) dumpsters) for a period of time until sufficient material has accumulated for reasonably effective off-site disposal. The actual disposal process is documented in Appendix 8 of this document which will also contain all manifests, receipts and contacts for the periodic disposal process.

6.9 Security

The oil product containers are properly demarcated, located inside a fenced area and/or all ports/nozzles are secured with a lock. Adequate lighting should be provided in all lay-down areas (to detect spills at night and to help deter vandalism).

6.10 Personnel, Training, and Spill Prevention Procedures

The Contractor Site Supervisors are the designated persons at the site who are accountable for spill prevention. The Contractor Site Supervisors (or their designee) and the RES Environmental and Safety Supervisors are responsible for training.

Initial "Awareness" training will be used to train all personnel during site orientation. Employees who handle oil products, conduct equipment maintenance, or operate construction vehicles or equipment at the site will receive additional training. The level of detail for employee training will depend on the person's level of responsibility for spill prevention, control, and response. Operational employees with the day-to-day responsibility for spill prevention and response will be given additional training, as needed. This training shall cover the following topics as required under Regulations 224/07 and 225/07

- 6.10.1 Overview of general site/facility operations.
- 6.10.2 Procedures for handling oil products.
- 6.10.3 Operation and maintenance of equipment used to prevent oil discharges.
- 6.10.4 Procedures and requirements for reporting oil discharge.
- 6.10.5 Overview of applicable pollution control laws, rules, and regulations.
- 6.10.6 Contents of the SPCC Plan for the site
- 6.10.7 Company representatives who handle oil products at the site will receive oil discharge prevention briefings annually (or more frequently if a spill or discharge

occurs) that describe any oil discharges, and any equipment failures or malfunctions that led or could have led to an oil spill or discharge. These oil discharge prevention briefings will also include an overview of any recent prevention or control measures that have been implemented

6.11 Potential Spill Prediction Information

The following table provides reasonable spill scenarios that could occur at the site/facility. This table includes the potential spill volume, estimated rate of flow, and direction of flow/containment if failure of an oil products storage container/ equipment occurs. (Not all potential spill scenarios are identified in this section).

CONTRACTOR POTENTIAL SPILL PREDICTION INFORMATION			
Storage Tank/Container (Insert ID & Volume)	Type of Reasonable Failure	Rate of Oil Product Released	Direction of Flow & Containment
Fuel/Lubrication Truck	Tanks - Catastrophic Failure - Parked or Operational	Instantaneous	Surrounding Soil. Use Spill Kit & Activate Emergency Response Cleanup Contractor
Fuel/Lubrication Truck	Tanks - Leak, Spill, or Overfill	Gradual	Surrounding Soil. Use Spill Kit.
Mobile Equipment	Tank - Catastrophic Failure - Parked or Operational	Instantaneous	Surrounding Soil. Use Spill Kit & Activate Emergency Response Cleanup Contractor
Mobile Equipment	Tank - Leak, Spill, or Overfill	Gradual	Surrounding Soil. Use Spill Kit.
Above Ground Storage Tank (AST)	Primary & Secondary Tank - Catastrophic Failure	Instantaneous	Surrounding Soil. Use Spill Kit & Activate Emergency Response Cleanup Contractor
Above Ground Storage Tank (AST)	Tanks - Leak, Spill, or Overfill	Gradual	Surrounding Soil. Use Spill Kit.

6.12 AST Inspections, Integrity Testing and Record Keeping

This section outlines all inspections, testing, and record keeping requirements regulated under 224/07 and 225/07. Inspections are associated with containers, piping, containment areas, and equipment. Testing is focused on the integrity of bulk storage containers, piping, and liquid level sensing devices. In addition, record keeping requirements for inspections and integrity testing are addressed in this section.

6.12.1 Inspections

Contractor personnel will conduct monthly inspections to confirm their SPCC Plan is being properly implemented and maintained. These inspections will cover all applicable oil product ASTs and associated piping connections for evidence of leakage and deterioration. The inspection procedures include:

- a) An inspection of all secondary containment structures and interstitial spaces on double walled ASTs for the presence of liquid (if equipped or accessible);
- b) A visual inspection of the tank exterior for damage and corrosion;
- c) An inspection of the normal operating and emergency vents on the ASTs (if equipped);
- d) A check of the O ring/gasket on the emergency vents (if equipped); and
- e) An inspection of the tank supports/foundations for signs of deterioration.

6.12.2 Integrity Testing

As required by Environmental Code of Practice for Aboveground and Underground Tanks Containing Petroleum and Allied Petroleum Products (Reference in 3.5), the ASTs must be tested using a non-destructive testing method. The agency recommends ASTs storing flammable and combustible liquids be tested annually. Contractor or the tank owner (if using rental equipment) will ensure the non-destructive testing is performed using a certified and licensed tank inspector and records are maintained.

6.12.3 Record Keeping

- a) The monthly inspection records, and spill reports for the AST's will be maintained on site for the duration of the construction project in Appendix 6 of the Construction Environmental Plan and then on the RES-Canada ECM for a minimum of three years.
- b) For Contractor owned ASTs, the non-destructive integrity testing records will be maintained at the Contractor's office for directly owned tanks or the ultimate owner for rental units for the most recent test performed and for comparison with future testing results. Documentation related to a "critical situation" (see below) will be kept on site for the duration of the construction project in the Construction Environmental Plan and then on the RES ECM for three years. Critical situations include situations where:
 - (1) A leak is found in the tank at any time.
 - (2) The tank has been exposed to a fire or other means which could cause damage.
 - (3) After a major storm event - tornado/hurricane/etc.

6.13 Spill Response, Clean-up and Reporting Procedures

- 6.13.1 If an oil product spill occurs, Contractor's representatives will follow the spill response, clean-up and reporting procedure provided in Appendix 4. Migration potential and the need for activating the Spill Clean-up Contractor will be evaluated by Contractor and/or the RES EL for all spills.

6.13.2 If a spill occurs during new oil product delivery and unloading by a Supplier under contract to Contractor, the Supplier will implement their spill response, clean-up, and reporting procedures. The Supplier is required by Contractor to carry a copy of their spill response, clean-up, and reporting procedures, as well a spill kit while on site.

6.13.3 RES Classifications, Reporting Procedures and Thresholds.

- a) If there is a spill which is reportable (> 100 liters in areas restricted to the public, or >25 liters in areas with public access) RES will respond to SPCC protocol outlined in appendix 4: Spill Response, Clean-up, and Reporting Procedure; RES will categorized this as a MAJOR SPILL and will be logged in the RCEMT 001 Environmental Incident Log located in appendix 12 of the CEP.
- b) If the spill is not reportable (< the amounts noted above), it is MINOR SPILL. RES observes no lower thresholds in regards to spill reporting. All spill/release (hydrocarbon to soil) regardless of volume, will be documented and mitigated. Subsequent Spill Response Form will be completed, and attached with photos and storage/disposal information.
- c) If the spill is contained in the vehicle and it does not impact the ground, RES will record this as a NEAR MISS. Procedure dictates that the faulty equipment will be Locked Out and Tagged Out (LOTO) until repaired. The repaired equipment will be re-inspected by the EL or qualified RES personal before it is placed back into service.
- d) The reporting requires an estimate of the quantity spilled and the approximate volume of spoil generated by the clean-up process. All spill information, including volumes will be included in the RCEMT001 Environmental Incident Log.

6.13.4 Emergency Contacts

a) Project Specific

Non Reportable <100L - Site EA during normal working hours

Reportable >100L - Project Manager

b) Local Agencies (Reportable)

Fire Department (threat to human health) (519) 436 - 3270

Police Department (threat to human health) (519) 436 - 6600

Local Hospital (emergency) (519) 352 - 6400

c) Ontario Ministry of Environment (MOE) 24 hr line) 1-800-268-6060

d) Spill Response Cleanup Contractors
Environmental Services Inc. (519) 682 - 2903

6.13.5 Reporting Information

In the event of a reportable spill the necessary information to be collected and provided is found in Appendix 4.

7.0 DELIVERABLES

- 7.1 Management Approval (Appendix 1).
- 7.2 SPCC Plan Review and Amendment (Appendix 12).
- 7.3 Monthly SPCC Plan Inspection Checklist (Appendix 3).
- 7.4 Spill Response Form (Appendix 5).
- 7.5 Reportable Spill Reports (Appendix #4).
- 7.6 Waste Oil Log (Appendix 8).
- 7.7 Certificates and all other approvals (Appendix 11).
- 7.8 Revisions as necessary

8.0 APPENDICES

- 8.1 Appendix 1 - Management Approval of SPCC
- 8.2 Appendix 2 - (To be completed and performed by the Contractor)
 - 8.2.1 Work Procedure Part 1 - New Oil Product Delivery and Unloading
 - 8.2.2 Work Procedure Part 2 - Used/Waste Oil Product Pickup and Loading
 - 8.2.3 Work Procedure Part 3 - Lubrication/Maintenance/Refueling of Mobile Equipment
- 8.3 Appendix 3 - Monthly SPCC Plan Inspection Checklist
- 8.4 Appendix 4 - Spill Response, Cleanup and Reporting Procedure
- 8.5 Appendix 5 - Spill Response Form
- 8.6 Appendix 6 - Provincial SPCC Contacts
- 8.7 Appendix 7 - Municipal/ Local Spill Response Contacts
- 8.8 Appendix 8 - Waste Oil Log, Waste Manifests and disposal Contractor Contacts
- 8.9 Appendix 9 - Above Ground Storage Facilities - Photos and Certifications

- 8.10 Appendix 10 - Register of Oil Storage Containers & Mobile Equipment with Controls
- 8.11 Appendix 11 - Executed Certifications by individual Contractors and RES
- 8.12 Appendix 12 - SPCC Revisions

Figure 1 - Site/Facility Diagram

Appendix 1 - Management Approval and Commitment Certification

North Kent Wind Project
Management Approval

I hereby certify that RES (Construction) and management of this construction site extends its full approval of this Spill Prevention, Control and Countermeasure (SPCC) Plan and will commit the necessary resources for implementation. The programs and procedures outlined in this Plan will be implemented and periodically reviewed and updated in accordance with Ontario Regulations and in the EPA, as amended, and with applicable federal, provincial and local requirements.

Additionally, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information I believe that the submitted information in this plan is true, accurate and complete.

Name: Faris Sha'ban

Title: RES Project manager

Signature: 

Date: 01/20/2017

Appendix 2 - Fuel, Lubrication & Disposal Procedures

- 1.0 Work Procedure Part 1 - New Oil Product Delivery and Unloading
- 2.0 Work Procedure Part 2 - Used/Waste Oil Product Pickup and Loading
- 3.0 Work Procedure Part 3 - Lubrication/Maintenance/Refueling of Mobile Equipment

Work Procedure Part 1 - New Oil Product Delivery and Unloading

This procedure will be followed to prevent an oil spill or discharge during the delivery and unloading of fuel and new oil bulk products from a Supplier tanker truck or delivery truck to Aboveground Storage Tanks (ASTs) and/or storage areas at RES construction sites:

1. For the first delivery, the Supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The Supplier delivering the new oil products will be required to complete both a RES Site Safety Induction and the required SPCC Training specific to the three applicable Work Procedures.
2. For all subsequent deliveries, the Supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The Site Security personnel will inform the Contractor representative of the delivery.
3. The Contractor representative will rendezvous with the Supplier at the site laydown yard.
4. The Supplier delivering the new oil products will park the tanker/delivery truck on flat ground in the designated delivery and unloading area of the laydown yard.
5. For filling ASTs:
 - The Contractor representative will unlock (if necessary) the fill ports on the new oil products ASTs.
 - The Supplier will check the available capacity in each new oil product AST to determine the approximate volume for filling the ASTs, recognizing absorbent materials are available if needed.
 - The Supplier will attach the hose to the AST to begin the filling process.
 - During the filling process, the Supplier and the Contractor representative will visually monitor (or use a high liquid level indicator if equipped) the liquid level in the AST and the Supplier will shut off flow when the AST is properly filled.
 - After the new oil product unloading process is completed, the Supplier will drain the hose into the AST, or if necessary, into a portable container.
 - The fill ports on the ASTs will be closed and locked.
6. For unloading bulk containers (e.g. 200 liter drums):
 - The Supplier will unload the bulk storage containers using appropriate handling equipment.
 - The Contractor representative will visually monitor the unloading procedure and ensure that Contractor's equipment, vehicles, and personnel do not interfere with the process.
 - The bulk containers will be staged on spill containment pallets or Rotary Top Containers (RTCs).
7. The Contractor representative will use spill kits to control any minor spills that may occur during the filling or unloading process.

8. The Supplier will prepare the tanker/delivery truck for departure. The Supplier will check for any oil drips or leaks from under the truck. If any oil drips or leaks are observed, the Supplier will take corrective actions to stop the drips or leaks. Prior to signing the Supplier manifest and allowing the Supplier to leave the site, the Contractor representative will also inspect the unloading area for any oil drips or spills that occurred during the unloading process. If any drips or spills occurred, the Supplier and the Contractor representative will clean up the spill and properly dispose of the residue. The Supplier will then leave the site.
9. The Contractor representative will lock all ports and nozzles on the ASTs after operational hours to prevent unauthorized access to the contents.
10. The Contractor representative will restock spill kits as needed.

Work Procedure Part 2 - Used/Waste Oil Product Pickup and Loading

In the event the project stores used/waste oil onsite in Aboveground Storage Tanks (ASTs) or drums, the procedure below will be followed to prevent a spill or discharge during the transferring and loading of used/waste oil to a tanker/recycling truck at the Contractor maintenance and storage site:

1. The Contractor representative will transfer the used/waste oil into the used/waste oil AST or drum with a pneumatic pump, electric pump, or pouring from collection containers and using direct observation.
2. After the transfer is complete, the Contractor representative will complete the Waste Oil Log found in Appendix 8.
3. When the used/waste oil AST or drum is full, or as part of a standard frequency, a Supplier will come to the site to pick up the used/waste oil.
4. For the first pickup, the Supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The Supplier delivering the new oil products will be required to complete both a RES-Canada Site Safety Induction and the required SPCC Training specific to the applicable Work Procedures.
5. For all subsequent pickups, the Supplier will stop at the security guard shack and register as part of the Site Security/Passport System. The Site Security personnel will inform the Contractor representative of the delivery.
6. The Contractor representative will rendezvous with the Supplier at the site appointed location..
7. The Supplier will park the tanker/recycling truck on flat ground in the designated loading area of the appointed location.
8. For vacuum pumping:
 - The Supplier will attach the hose to the used/waste oil AST or drum to begin the pumping process.
 - During the pumping process, the Supplier and the Contractor representative will visually monitor the liquid level in the tanker/recycling truck and shut off the flow when the AST or drum is emptied.
 - After the used/waste oil loading process is completed, the Supplier will drain the hose into the tanker truck, or if necessary, into a portable container.
 - The drain port on the used/waste oil AST or drum will be closed.
9. For loading of bulk containers (e.g. 200 liter drums):
 - The Supplier will check to ensure that lids are securely closed.
 - The Supplier will load the bulk storage containers using appropriate drum handling equipment and secure the load on the truck with adequate restraints.
 - The Contractor representative will visually monitor the loading procedure and ensure that no equipment, vehicles, and personnel interfere with the process.

10. The Contractor representative will use spill kits to control any minor spills that may occur during the filling or loading process.
11. The Supplier will prepare the tanker/delivery truck for departure. The Supplier will check for any oil drips or leaks from under the truck. If any oil drips or leaks are observed, the Supplier will take corrective actions to stop the drips or leaks. Prior to signing the Supplier manifest and allowing the Supplier to leave the site, the Contractor representative will also inspect the unloading area for any oil drips or spills that occurred during the unloading process. If any drips or spills occurred, the Supplier and the Contractor representative will clean up the spill and properly dispose of the residue. The Supplier will then leave the site.
12. The Contractor representative will lock all ports on the ASTs and close the lids on all drums after operational hours to prevent unauthorized access to the contents.
13. The Contractor representative will restock spill kits as needed.

Work Procedure Part 3 - Lubrication/Maintenance/Refueling of Mobile Equipment

There is a wide range of mobile equipment used on Contractor construction sites that require lubrication, maintenance, and refueling. This equipment is often too dispersed to bring to one central location. Most of the mobile equipment lubrication, maintenance, and refueling activities will be performed using a Fuel/Lubrication Truck. The following procedures will be followed:

1. Lubrication, maintenance, and refueling operations shall be performed in accordance with all federal, state, and local requirements - The Fuel/Lubrication Truck will be properly placarded according to the MOT requirements for Hazardous Materials. The Fuel/Lubrication Truck will be stocked with a spill kit (drip pan, diapers and absorbent materials) and Class ABC Fire Extinguisher with a minimum 4kg rating. Mechanical locks and other positive securing technology will be used to prevent acts of vandalism that would lead to an accidental discharge of oil product into the environment. The contact information for the Emergency Response and Clean-up Contractor will be readily available to the driver/operator inside the cab.
2. To the extent practical, all lubrication, maintenance, and refueling activities shall be at one or several designated locations with flat ground and at a minimum distance of 15M from any water-way, creek, river, stream, storm drain, or other body of water. The Contractor representative responsible for the lubrication, maintenance, and refueling will survey the area to ensure the optimal location is selected.
3. All fuel dispensing systems will be equipped with automatic shutoffs and hold open type latches. No artificial means of keeping the nozzle open are to be used.
4. The Contractor representative responsible for refueling shall wear the following PPE: Hard Hat, Safety Glasses, Steel-toe Work Boots, Work Gloves, Flame Retardant Clothing (covering the entire body), and a Class II Reflective Vest. Chemical Resistant Gloves and Splash Goggles shall be made available if skin contact is expected.
5. The Contractor representative will have a radio that is capable of communicating with the site office and a mobile phone for contacting the Emergency Response and Clean-up Contractor, in the event of an emergency.
6. Proper bonding and grounding procedures will be utilized during all fuel dispensing or filling operations. All other operating vehicles should remain a minimum of 30 meters from ongoing refueling operations. Fuel hoses will not be subject to running over by vehicles or equipment or dragged excessively resulting in abrasion, kinking, or damage.
7. Engines on equipment being refueled will be shut off and the parking brake set. The engine on the Fueling/Lubrication Truck will also be turned off providing the battery can adequately power the onboard electric pump to complete the refueling process.
8. Lubrication, maintenance, and refueling equipment will be inspected regularly for integrity and at each time of use. Evidence for corrosion or deterioration will be noted. The Contractor representative will inspect the mobile equipment being refueled for leaks, drips, staining, or other evidence of leakage prior to initiating fuel transfer. Fuel will not be transferred if leakage is evident. Fueling will be stopped if leaks are identified during the refueling process. Defective or malfunctioning equipment shall be reported to the Contractor Site Supervisor. Systems are to be

periodically tested according to the manufacturer's recommendations. There will be no topping off of equipment after an automatic shutoff device terminates the flow. Records of equipment maintenance, lubrication, and fuel transfers shall be kept in accordance with project requirements. All minor spills must be addressed properly in accordance with the SPCC requirements.

9. The Contractor representative responsible for refueling must remain with the Fuel/Lubrication Truck and mobile equipment at all times during the process. There shall be absolutely no smoking or open flames within 15 meters of any refueling operation.
10. All precautions utilized for preventing spills and injuries during refueling operations will also be followed during lubrication and maintenance operations (e.g. addition of hydraulic oil or motor oil to reservoirs or engines). Lubrication and maintenance that must be performed onsite will be performed in a way that all fluids can be captured, contained, and properly transferred for storage and recycling without spillage. Drip pans will be used to contain and capture drips or spillage where it has the potential to occur.
11. After lubrication, maintenance, and refueling operations are completed, the Fuel/Lubrication Truck will be parked at the Contractor's approved area.

Appendix 3 - Monthly SPCC Plan Inspection Checklist

(Each Contractor's submittal to be recorded in separate sub-folders)

**North Kent Wind Project
Monthly SPCC Plan Inspection Checklist**

The following inspection procedure will be performed to ensure the SPCC Plan is being properly implemented and the applicable ASTs and associated equipment are being properly maintained. A response of "No" to any of the inspection requirement questions below requires corrective action to be taken.

Date: _____

Inspector's Name: _____

Inspection Requirement Question	Response to Inspection Yes/No/NA	If "No" - State Corrective Action, Person Responsible & Date for Completion
Are all ASTs, aboveground valves, or piping without leaks, spills and/or signs of deterioration? If equipped, are all anchor bolts on the ASTs in good condition and properly attached?		
Is the interstitial space (if accessible) between the double-walls of each tank without oil and water, and the liquid level gage (if equipped) working properly?		
Are spill kits properly equipped and available in the designated areas?		
Are all gates and fences in the oil storage areas in good condition? All gates, doors, nozzles, and/or tanks equipped with locks to prevent vandalism? All gates, doors or ASTs locked when not in use?		
Is the lighting (if available) in the oil storage areas working properly?		
Are the used oil ASTs labeled "Used Oil" or "Waste Oil"? Have you inspected and cleaned the normal operating and emergency vents on the primary and secondary tanks of the AST (if equipped) and replaced vents if necessary?		
Have you checked to ensure that the O-rings/gaskets on the emergency vents are not damaged or deteriorated and replaced the O-rings/gaskets if necessary?		
Are all drums/containers storing petroleum products structurally sound and sealed tight?		
Is heavy equipment which uses petroleum-based fuels and oils in sound working condition?		

Additional Notes: _____

Inspector's Signature: _____

Appendix 4 - Spill Response, Clean-up and Reporting Procedure

For clarity, the following is the specific information delineation of “NON-reportable” oil spill. There are other classes for non-petroleum and electrical based spills which can be referenced in the Ontario Regulation 675/98 or 225/07 - Classification and Exemption of Spills and Reporting of Discharges

Class VIII: Petroleum Sector

The spill of gasoline or an associated product of not more than **100 liters** in areas restricted to the public, or not more than 25 liters in areas with public access, at a location defined as a bulk plant, marina, private outlet or retail outlet in O. Reg. 217/01 Liquid Fuels under the Technical Standards and Safety Act 2000, is classified as a Class VIII spill. Subject to four conditions, Class VIII spills need not be reported to the Ministry or to the municipality. Police officers or other public servants who may investigate or are aware of the spill also do not have to notify the Ministry.

The four conditions that must be met for the reporting exemption to apply are:

- 1) The spill of the gasoline or an associated product does not enter and is not likely to enter directly or indirectly water or a watercourse, as defined by the Ontario Water Resources Act,
- 2) the spill does not cause adverse effects other than those that are readily remediated through cleanup and restoration of paved, graveled or sodded surfaces,
- 3) Arrangements for remediation are made immediately
- 4) Records of the spill are maintained

Spill Response, Clean-up and Reporting Procedure

In the event that a spill to land occurs, the following procedure is to be followed:

1. Stop operations.
2. Identify the product - check container design, warning labels, and markings.
3. If necessary, prevent personnel from approaching the area and keep them at a distance sufficiently removed that they will not be injured by, or cause a fire/explosion.
4. Stop the flow at the source - reduce or terminate the motion of product without endangering anyone.
5. The Contractor representative will report the spill to the Contractor Site Supervisor. Basic information such as type of spill, location and approximate volume will be provided.
6. The Contractor Site Supervisor will implement the plan and inform the RES Project Manager and the RES EL of the spill. Based on the information provided, the RES EL will determine the classification of the spill (Non-reportable or Reportable). The RES Project Manager will inform the client's Project Manager.
7. The clean-up of non-reportable spills will usually be handled on site by Contractor representatives. Migration potential and the need for activating the Spill Response and Clean-up Contractor will be evaluated by the Contractor and RES for all spills. Should the spill present concerns for waterway or restricted area contamination, RES may require the use of an experienced and certified mitigation contractor.
8. The Contractor representatives responsible for spill clean-up shall wear appropriate PPE. This could include but is not limited to the following: Hard Hat, Safety Glasses, Rubber Boots, Chemical Resistant Gloves, and Flame Retardant Clothing (covering the entire body). Splash goggles and a disposable, tyvek suit shall be made available if deemed necessary due to expected skin contact.
9. The Contractor representatives will apply the absorbent material in a sufficient amount to absorb the oil product. If the spill occurs in an area where the ground is sloped, temporary drain covers will be placed over catch basins in the area, if applicable. Absorbent will be applied in front of the leading edge of the spill; covering the entire spill area. If appropriate for the spill scenario, oil will be prevented from reaching the storm water catch basin by applying additional absorbent around (not in) the catch basin.
10. Shovels, brooms and mobile equipment will be used to thoroughly clean the area where the spill occurred. Mobile equipment will be used to install dams in streams or waterways to limit migration potential, as needed. Oil contaminated soil in the area will be over-excavated as needed.

11. All spent materials and oil contaminated soil will be transported to a secured storage area on site, placed in labeled secondary containment, and then properly disposed of at Progressive Waste Solutions.
12. The RES Project Manager and/or the RES EL or designee will inspect the location of the spill to ensure the clean-up was performed correctly and that no recoverable residue remains.
13. Materials containing or otherwise contaminated with used/waste oil from which the used/waste oil has been properly drained or removed to the extent possible so that no visible signs of free-flowing oil remain in or on the material are subject to regulation as a Special Waste.
14. Municipal Waste Landfills listed in the

Progressive Waste Solutions
Follow links below for: http://local.progressivewaste.com/windsor

15. In the event of a spill (Reportable or non-reportable) that is beyond the ability of the Contractor representatives and available equipment to properly clean-up; the Contractor Site Supervisor will coordinate with the RES Project Manager and RES EL and arrange for assistance from one of the following Spill Response and Clean-up Contractors:

Environment Services Inc.	(519) 682 - 2903
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16. The Spill Response and Clean-up Contractor will then clean-up the spill, absorbent materials, and any potential waste materials and dispose of at one of the Municipal Waste Landfills listed above. The Spill Clean-up Contractor will also decontaminate the area, equipment and surfaces that have been contacted by the spilled material.
17. For all spills, a Contractor representative will complete the Spill Response Form in Appendix 5. A copy of the Spill Response Form will be submitted to the Contractor Site Supervisor, the RES Project Manager, and the RES EL. A copy of the completed form will be maintained on site in the site specific Construction Environmental Plan in the CEP Appendix 3.
18. In the event of a Reportable spill -the following additional actions will be implemented:

The RES Project Manager and the RES EL will notify the MOE Spill Action Center as soon as possible. The notification of the local contacts will be in accordance with local requirements but in no case more than 24 hours after the event. The following information will be provided to the authorities:

- Project point of contact and contact information.
- Exact site address/location and phone number.

- Spill date and time.
- Type of material spilled (for example, fuel oil or hydraulic oil).
- Estimated quantity spilled.
- Estimated quantity entering navigable waters.
- Source of spill.
- Description of affected area (for example, spill covered dirt area 25 meters long by 15 meters wide).
- Cause of the spill.
- Injuries or damages.
- Corrective actions taken.
- Whether evacuation is needed.
- Names of other parties contacted.
- Names of other parties to be contacted.

Appendix 5 - Spill Response Form

This document will be kept in the Construction Environmental Plan (Appendix 3)



North Kent Wind Project
Spill Response Form

Date of Incident: _____

Incident Number: _____

Complete for all oil product spills. Provide a copy of the completed form to the Contractor Site Supervisor and the RES Environmental Supervisor.

Information required (Note item number)

Item 1: Person Reporting Spill or Incident

Item 2: Type of Spill

Item 3: Location of Spill

Item 4: Describe Incident

Item 5: Actions Taken

Item 6: Env. Lead Notifications

Item 1: Person Reporting Spill

Name:

Title:

Telephone:

Signature:

Company:

Address:

Item 2: Type of Spill

Common Name of Spilled Substance:	
Quantity Spilled (Estimate):	
Concentration (Estimate):	

Item 3: Location of Spill

SPILLS TO LAND	SPILLS TO WATER
Name of Site:	Name of Water Body:
Street Address or Location (Coordinates; Road Number; Turbine Number)	Location of Discharge with Reference to Fixed Point:

Item 4: Incident Details

Affected Area	
Other Details	

Weather Conditions: Wind Direction and Speed:		Temperature:	Precipitation:
Time Spill Started:	___ AM ___ PM	Time Spill Ended:	___AM ___PM

Item 5: Actions Taken

To Contain Spill or Impact of Incident:

To Clean-up Spill or Recover from Incident:

To Remove Clean-up Material:

To Prevent Reoccurrence:

Additional Information (As required) Presented on Attachments:

Item 6:

Environmental Lead Notifications:

Potential for groundwater contamination? Yes No (circle one)

Spill Quantity at Reportable Level? Yes No (circle one)

SPILL REPORTED TO:
Name/Number:
Organization/Agency:
Date/Time:

Closure Details:

Person Responsible for Managing Termination/Closure of Incident or Spill:

Name: _____ Phone: _____

Email: _____

Appendix 6 - Provincial SPCC Contacts

Canadian Provincial SPCC Contacts

Province

Phone Number

MOECC	4510 Rhodes Dr, Unit 620,Windsor, ON N8W 5K5	(800) 387-8826	(800) 268-6060
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Appendix 7 - Local/Municipal Environmental Protection Agency Spill Response Contacts

MOECC

Appendix 8 - Waste Oil Log

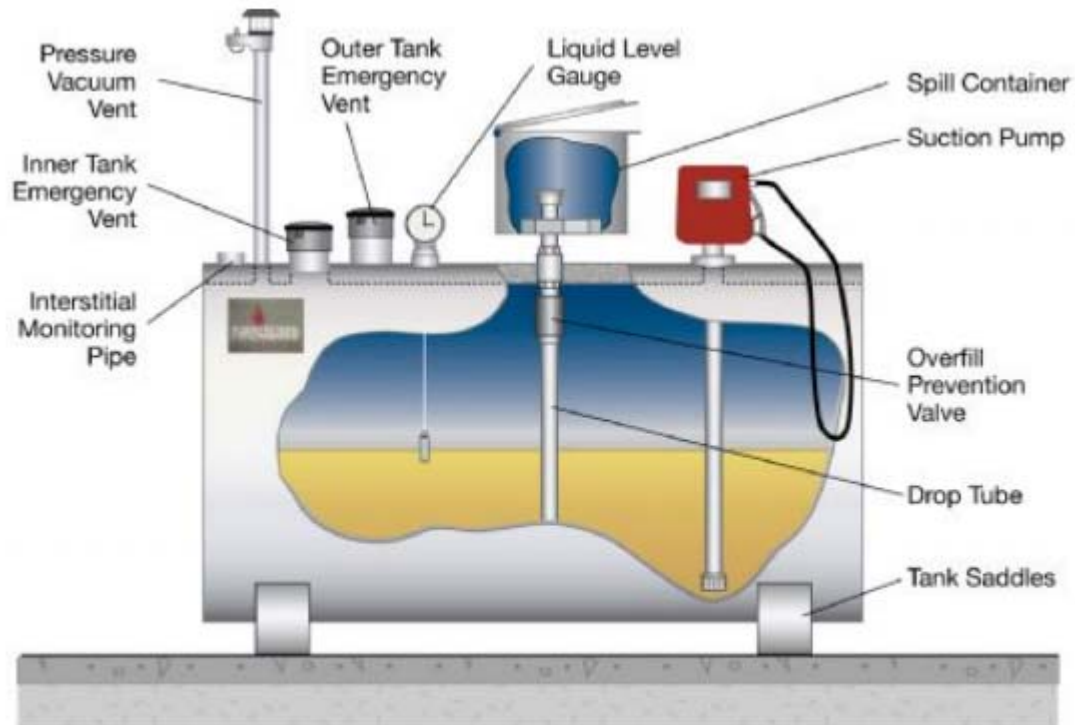
The waste manifests and other off-site disposal documentation will be kept in the Construction Environmental Plan in the CEP, Appendix 9. The attached log (Template) will track history of disposal and will be maintained in the CEP Appendix 9, also.



WASTE OIL LOG						
Date of Service	Operator/Driver's Name	Project Name	Type of Oil	Quantity Removed or Added	Destination	Summary of Equipment Serviced

Appendix 9 -

Photographs of Above Ground Storage Tanks (ASTs) and Spill Containment Equipment. Locations cross referenced to Figure 1 of this document.



Top Fill and Top Mounted Pump (Suction System).

This configuration is popular in many small diesel or biodiesel vehicle fueling applications

Appendix 10 - Register of Oil Storage Containers & Mobile Equipment with Controls

Insert the completed Contractor prepared "Register of Oil Storage Containers & Mobile Equipment with Controls" in this appendix. The directions for completing this register are contained in Section 6.7 of this SPCC.

There should be one register for each Contractor on site. The register shall be periodically updated to conform to the project workflow and schedule.

Appendix 11 - Executed Certifications by individual Contractors and RES

1. Contractor Management Approval (Complete one form per contractor)
2. RES Approval

Contractor Management Approval *RES Canada Construction (Ontario) LP*

Management is committed to providing the manpower, equipment, facilities and materials required to establish precautionary measures and to expeditiously control and remove oil discharged as a result of a spill or release at this project.

By signature, I certify that I have reviewed and approved the SPCC Plan, and have authority to commit the resources required to implement it. In addition, "I certify that if any part of this SPCC Plan requires the consent of the owner(s) of or another operating entity for the site/facility, that consent has been obtained."

Printed Name:	
Title:	
Signature:	
Date:	

RES Approval

In accordance with the regulations noted in Section 3 of the SPCC (Regulations), I hereby certify that:

- ✓ I am familiar with the provisions of Regulations - Oil Pollution Prevention.
- ✓ I, or my agent, have examined the site/facility described herein.
- ✓ This SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the applicable requirements of Regulations
- ✓ Procedures for required inspections and testing have been established.
- ✓ This SPCC Plan is adequate for the site/facility.

RES Project Manager:	
Signature:	
Date:	

Appendix 12 - SPCC Plan Review and Amendment

This SPCC Plan will be amended and re-certified (if needed) within 30 days of a change in site/facility design, construction, operation, or maintenance that materially affects the site/facility's potential for discharge of oil, oil products, or hazardous substances into the environment.

The SPCC Plan also will be reviewed and evaluated at least once during the project to determine the need for amendment.

The following table summarizes plan review and identifies whether an amendment to the plan is required.

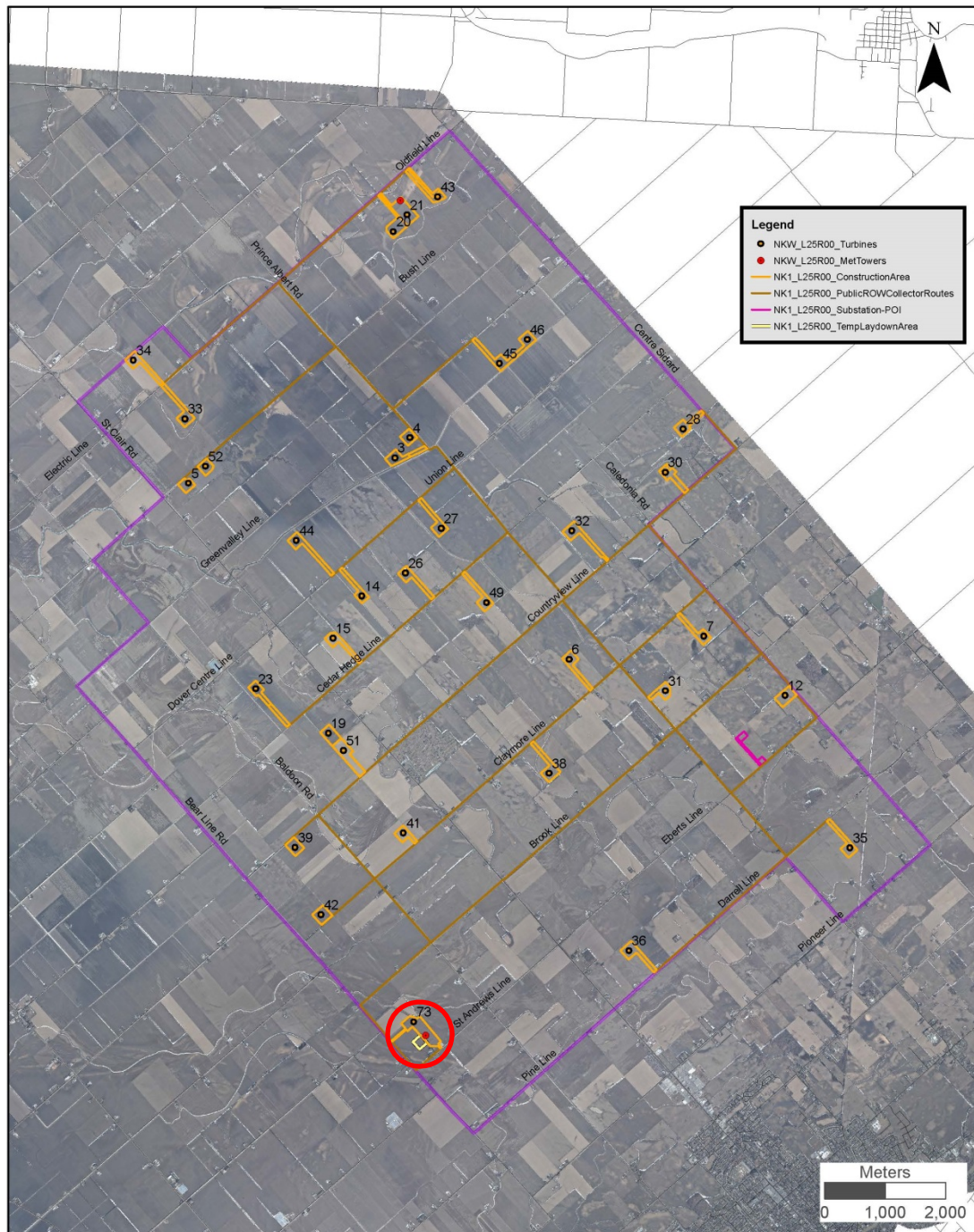
Plan Review

Date of Review	Signature	Amendment Required Yes/No

Plan Amendment

Date of Amendment	Description of Amendment	Issue Number and Distribution

Figure 1 (Site layout and location of storage areas)



North Kent Wind Project - Layout25 Rev00

Privileged and Confidential
18 Jan 2017