

January 24, 2022

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## Reference: Springbank Off-Stream Reservoir Project – IAAC Approval Conditions 11

The following memo provides a description of the status Alberta Transportation has made regarding IAAC approval conditions 11.2, 11.3 and 11.4.

### IAAC Approval Condition 11.2, 11.3 and 11.4

The Impact Assessment Agency of Canada (IAAC) outlined in approval conditions 11.2, 11.3 and 11.4 of their Decision Statement:

**Condition 11.2** *The Proponent shall consult, prior to construction, Indigenous groups on the measures to be implemented to prevent accidents and malfunctions.*

**Condition 11.3** *The Proponent shall develop in consultation with Indigenous groups and relevant authorities, an accident and malfunction response plan in relation to, and for the construction of the Designated Project and an accident and malfunction response plan in relation to, and for the operation of the Designated Project. The Proponent shall develop the accident and malfunction response plan in relation to, and for construction of the Designated Project prior to construction and the accident and malfunction response plan in relation to, and for the operation of the Designated Project prior to the first flood operation. The accident and malfunction plans shall include:*

- 11.3.1 *the types, location, and quantities of all substances expected to be stored and transported within the project development area that may cause adverse environmental effects in case of a spill;*
- 11.3.2 *a description of the types of accidents and malfunctions that may cause adverse environmental effects during any phase of the Designated Project, including fire, spills and overtopping, failure or breach of the auxiliary spillway and pipeline rupture;*
- 11.3.3 *the measures to be implemented in response to each type of accident and malfunction referred to in condition 11.3.1 to mitigate any adverse environmental effect caused by the accident or malfunction, including:*
  - 11.3.3.1 *measures to prevent or minimize containerized material spills from spreading over land surfaces and measures to recover spilled materials from water bodies, as required;*

- 11.3.3.2 *measures to identify any sensitive habitats where response efforts shall be prioritized and where shoreline clean up shall be undertaken; and*
- 11.3.3.3 *measures to reduce fire hazard and enhance fire preparedness.*
- 11.3.4 *the locations of spill containment kits within the project development area;*
- 11.3.5 *the implementation of regular and coordinated personnel training exercises for the prevention of and response to accidents and malfunctions referred to in condition 11.3.2; and*
- 11.3.6 *a description of how the Proponent will evacuate its property and participate in coordinated evacuation procedures with relevant authorities in the case of an accident or malfunction requiring evacuation.*

**Condition 11.4** *The Proponent shall maintain the accident and malfunction response plan referred to in condition 11.3 up-to-date during all phases of the Designated Project. The Proponent shall submit any updated accident and malfunction response plan to the Agency and to the parties being consulted during the development of the plan within 30 days of the plan being updated.*

To fulfill these conditions, the following clauses are contained in the Construction contract and the Vegetation and Wetland Mitigation, Monitoring and Re-vegetation Plan respectively.

Schedule 3 (Construction contract)

- 3.1.5 *advise the Province as soon as possible of all accidents;*
- 3.1.6: *investigate any accident that causes injury, and complete accident forms and prepare accident reports;*

Schedule 5 (Construction contract):

- 5.2.1 and 6.2.5: *not release, dump, spill or dispose of any substance into the environment that causes or could cause Environmental Damage or Degradation or harm human health or safety*
- 5.2.2: *mitigate to ensure compliance with all regulatory legislation, any wastes arising from the Work and any other substances that causes or could cause impairment of or damage to the environment or human health or safety.*
- 5.5: *During the Work, any spills or releases of Hazardous Substances, whether or not they cause or could cause Environmental Damage or Degradation or harm human health or safety, the Contractor shall:*
  - 5.5.1. *immediately report such to the Consultant, the Province, Alberta Environment and Parks (1-800-222-6514), and Fisheries and Oceans Canada (1-800-642-3800); and*
  - 5.5.2. *take all reasonable measures to contain the spill and cleanup. Any such Work shall be performed in accordance with the applicable legislation and regulations at the Contractors' expense.*

Schedule 7 (Construction contract):

- 7.2.4.: *Mitigate any potential for Hazardous Substances to enter the environment through appropriate sediment and erosion control measures, and the limitation of using herbicides and fertilizers in the dry reservoir and near waterbodies, and using non-toxic biodegradable hydraulic fluids in equipment for any required instream Work;*
- 7.2.5: *remove spilled Hazardous Substances and liquid wastes in accordance with Regulatory Requirements;*

## Schedule 8 (Construction Contract):

- *8.1: The Contractor shall*
  - *8.1.1: use regularly maintained and mechanically sound equipment with no oil leaks, fuel or fluid leaks;*
  - *8.1.2: inspect equipment daily and immediately repair any leaks in accordance with regulatory requirements*
  - *8.1.3: manage and safely store fuels, lubricants and hydrocarbons if located on the Site;*
  - *8.1.4: employ persons who are qualified to handle construction equipment fuels, lubricants and hydrocarbons;*
  - *8.1.5: transport construction equipment fuels, lubricants and hydrocarbons in accordance with regulatory requirements*
  - *8.1.6: prevent handling and fuelling operations from contaminating the ground, surface water, and ground water and shall at all times prevent Environmental Damage or Degradation;*
  - *8.1.7: use containment berms and an impermeable base course, concrete pads or other system to contain spilled fuel;*
  - *8.1.8: clearly mark and barricade fuel storage areas and non-portable transfer lines that are visible under all weather conditions;*
  - *8.1.9: ensure that all fuel nozzles are equipped with functional automatic shutoffs. Service vehicles and fuel trucks shall carry a minimum 10 kg of commercial grade absorbent, shovels, and an empty fuel barrel in case of a spill; and*
  - *8.1.10: store waste materials in a tank or closed container and dispose of off-Site in accordance with regulatory requirements*
- *8.2: All on-Site fuel storage tanks larger than 1000 litres shall be located in a bermed area lined with polyethylene sheeting. The bermed areas shall have holding capacities equal to or greater than 110 % of the largest tank within the berm.*
- *8.3: The Contractor shall maintain 100 m setback between stored fuels, lubricants and hydrocarbons and rivers, streams and surface water bodies.*
- *8.4: All equipment servicing activities with the potential for accidental spills (i.e. oil changes and hydraulic repair) shall be conducted in a designated area over an impervious tarpaulin. These activities shall not be undertaken within 100 m of rivers, streams and surface water bodies.*
- *8.8.12.: Reporting of any known accidents is a joint effort of all parties. The first person aware of the accident is to advise the other parties. If the Contractor becomes aware of an accident on the Site, they shall immediately advise the Consultant and the Province. The Consultant will do an investigation and accident report.*

## Vegetation, Wetland and Revegetation Plan

- *Potential contaminant-related effects will be mitigated through road water runoff management, using appropriate sediment and erosion control measures, limiting the use of herbicides and fertilizers in the dry reservoir and near water bodies, and using non-toxic biodegradable hydraulic fluids in equipment for any required instream works.*

A letter was sent to Indigenous groups on January 21, 2022, seeking feedback on the measures, as listed above, to prevent accidents and malfunctions. Feedback is due by February 4, 2022. This feedback will be reviewed and incorporated as appropriate to fulfill approval condition 11.3.

We hope this memo provides the necessary detail regarding Approval Conditions 11 listed above. If there are any questions, please do not hesitate to contact myself.

Respectfully,

Alberta Transportation

<Original signed by>

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