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Sunny Sandher
Development Manager
Wesgroup Properties
Suite 910 – 1055 Dunsmuir Street
Vancouver, BC V7X 1L3

Dear Sir,

RE: TIER 1 LOGISTICS BUILDING – 8579-8644 RIVER ROAD, DELTA, BC
PRELIMINARY SPILL PREVENTION PLAN

This correspondence represents a preliminary Spill Prevention Plan (Plan) that is to be incorporated within an Environmental Protection Plan to be prepared by the Contractor retained to construct the stormwater outfall (Project) for the above referenced building.

Spill Prevention Plan

Training and General Practices

Training and general management practices will be implemented by the Project's Contractor to facilitate the prevention of spills of deleterious substances (toxic and/or hazardous materials) during the Project. These include, but are not limited to:

- ensuring that all staff and sub-contractors have received training and are adequately trained in the implementation of best environmental practices and standards before the commencement of overall construction, and before specific tasks and/or activities that have the disproportionate risk of causing a spill;
- conducting a tailgate meeting with staff and/or sub-contractors regarding the Plan whenever a change of conditions may affect the risk of a spill; changes of conditions include changes in construction personnel, work activities, weather, and the presence of visitors within the limits of the site;
- documentation of all training sessions, meetings, and instructions through signed training and tailgate forms, and written instructions signed by the instructor; documentation will include a description of subjects addressed and the identification and signatures of all training session and meeting attendees;
- ensuring that adequate supplies are onsite to implement spill mitigation measures and to respond adequately to spills (as prescribed by the Emergency and Spill Response Plan); and,
- embracing an adaptive management approach to the implementation of prescriptive measures presented by the Plan, and best management practices and standards; the Environmental Monitor is part of this adaptive approach, and should be consulted during consideration and implementation of actions intended to mitigate the risk of spill.

Key Project Personnel

This section of the Plan describes the roles and responsibilities of Wesgroup Properties (Wesgroup) and the Project's Contractor for implementing, inspecting, and reporting on spill prevention measures. Wesgroup is responsible for the construction of the Project as required by the City of Delta as part of the building permit for the Tier 1 Logisitcs Building. The City of Delta is the owner of the Project.

Wesgroup and the Contractor, and all respective personnel working on the Project, are responsible for the mitigation of risk for all spills. Personnel involved in the implementation, inspecting and reporting on spill prevention measures are presented in Table 1. Details on the roles and responsibilities these personnel follow.

Table 1. Key Project Contacts

Name	Role	Organization	Phone Number
TBD	Project Manager	Wesgroup	
TBD	Project Construction Manager	Wesgroup	
TBD	Project Environmental Monitor	Wesgroup	
TBD	Contractor Project Manager	Contractor	
TBD	Contractor Environmental Manager	Contractor	
TBD	Contractor Environmental Specialist(s)	Contractor	
TBD	Municipal Inspector	City of Delta	

<u>Wesgroup Manager and Construction Manager</u>

Wesgroup is responsible for overall Project implementation, including the administration of contracts, technical quality control, adherence to and performance of engineering requirements of Contract Specifications. Wesgroup, as facilitated by its Project Manager and Construction Manager, is responsible to:

- ensure compliance with terms and conditions of regulatory permits, approvals, and authorizations, relevant legislation, and best management practices and standards;
- coordinate construction inspections to ensure compliance with engineering specifications and standards;
- ensure effective communication links among respective personnel of Wesgroup and the Contractor;
- manage communications and relations with the City of Delta;
- delegate authority and communicate requirements as needed regarding all aspects of the Project;
- assess the qualifications, experience and performance record of the Contractor's Environmental Manager and Specialist(s), and the Contractor's environmental record, as part of tender evaluations; and,
- engage a Qualified Environmental Practitioner as Wesgroup's Environmental Monitor.

Wesgroup Environmental Monitor

Wesgroup's Environmental Monitor's scope of responsibilities will include inspection, evaluation and audit of the work of the Contractor and its Environmental Manager and Environmental Specialist(s). Roles and responsibilities of the Environmental Monitor include:

- communication of the requirements of this Plan to the Contractor's Project Manager, Environmental Manager, and Environmental Specialist(s);
- audit of environmental orientation and training sessions delivered to Contractor staff by the Contractor's Environmental Manager; adequacy of sessions to be accepted by Wesgroup's Project Manager and Construction Manager prior to commencement of construction;
- review of the Contractor's EPP and component details, procedures, and plans as they relate to the prescription and delivery of spill prevention measures, and best management practices and standards; the Contractor's EPP is to be accepted by Wesgroup's Project Manager and Construction Manager prior to commencement of construction;
- review of the Contractor's environmental monitoring reports, as prepared by the Contractor's Environmental Manager, for completeness, accuracy, adequacy of applied mitigation measures, and compliance with the Plan; reviews will be reported within one business day to Wesgroup's Construction Manager and the Contractor's Environmental Manager;
- report to Wesgroup's Construction Manager on the effectiveness of mitigation measures being implemented to prevent spills, difficulties and/or deficiencies encountered, and how such difficulties and/or deficiencies were addressed; reporting will be conducted immediately upon resolution of difficulties and/or deficiencies;
- audit reports and manifests produced by the Contractor's Environmental Manager and Environmental Specialist(s); audits will be reported to Wesgroup's Construction Manager and the Contractor's Environmental Manager on a weekly basis;
- verify that copies of environmental agencies' permits/approvals and emergency and spill response procedures are maintained at work site(s) at all times;
- audit and evaluate compliance of work practices, procedures and effectiveness of mitigation measures with terms and conditions of regulatory approvals, with the Plan, and with best management practices and standards; audits will be conducted on a daily basis; non-compliance will be reported upon detection to the Contractor's Environmental Manager and Wesgroup's Construction Manager; overall audit results will be reported to the Contractor's Environmental Manager and Wesgroup's Construction Manager on a weekly basis;
- as required, provide recommendations to the Contractor through Wesgroup's Project Manager to addressed deficiencies in compliance with the Plan, and respective component details, procedures, and plans, with regulatory permits and approvals, with relevant legislation, and with best management practices and standards; recommendations will be presented in the weekly audit reports;
- review and comment on the Contractor's Environmental Monitoring Completion (i.e. Final) Report;
- assist in emergency situations or incidents, including emergency and spill response; and,
- recommend immediate suspension of construction activities to Wesgroup's Construction Manager, based on non-compliance with the Plan, contravention of regulatory permits and approvals, contravention of relevant legislation, absence of best management practices and standards, and/or environmental damage resulting from construction related activities, until

appropriate actions to achieve compliance and/or prevent further environmental damage are identified and implemented to the satisfaction of Wesgroup.

Contractor Personnel

The Contractor's roles and responsibilities include:

- compliance with project and environmental conditions of regulatory agency permits, approvals and/or authorizations issued to the Project, and all relevant federal, provincial, and municipal laws, statutes, by-laws, regulations, orders and policies;
- retention of a qualified Environmental Manager responsible training and general practices, and for implementation of spill prevention measures; the Environmental Manager reports directly to the Contractor's Project Manager and Wesgroup's Environmental Monitor;
- development and implementation of a site and activity-specific measures to ensure compliance with the Plan; as the Plan is a living document, adaptive prescriptions to address specific site conditions and activities will be developed and appended to the Plan as addendums; and,
- retention of Environmental Specialists as necessary to assist the Contractor's Environmental Manager with preparation and implementation of the Plan, including environmental monitoring, environmental reports, requirements, emergency spill response, clean-up activities, and incident investigation reports, and compliance with the Plan.

Machinery and Equipment

The greatest risk of a spill is associated with the operation of machinery and equipment. A spill associated with the operation of machinery and equipment will likely consist of the release of petroleum hydrocarbons.

A list of all equipment and machinery to be used onsite during construction will be provided by the Contractor to Wesgroup prior to construction. All non-road diesel equipment will be subject to the Port Authority Non-Road Diesel Emissions Program (NRDE). The Contractor will complete and submit the NRDE Annual Reporting Tool for applicable equipment prior to construction.

The following measures will be implemented by the Contractor to mitigate the risk of adverse impacts to environmental resources:

- inspection of all equipment prior to mobilization to the site will occur to ensure they are in good operating order and free of leaks, excess and oil grease;
- major maintenance and repairs of all equipment will be done offsite;
- all equipment, including light-duty vehicles, will have a spill containment kit onboard at all times;
- inspection of equipment on a daily basis, prior to commencement of construction, by the operator will occur to ensure it is in good operating order; the inspection will be documented and reported to the Contractor and subsequently to Wesgroup; minor maintenance may occur onsite to address deficiencies; major maintenance will occur offsite to address deficiencies;
- cleaning of equipment, involving surfactants and/or degreasers, will occur offsite; and,
- use of only biodegradable oil and/or hydraulic fluid within machinery and equipment.

Equipment Refuelling Procedures

The Contractor will implement the following mitigation strategies to ensure that petroleum and other hazardous products are not discharged to the environment during refuelling:

- any land-based storage of petroleum and/or other hazardous products will be located at least 30 metres from the mean high water elevation of the Fraser River, and the landside drainage system;
- petroleum storage will be in accordance with the Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum Products and Allied Petroleum Products (Canadian Council of Ministers of the Environment 2003);
- any land-based petroleum storage facility will be surrounded by an impermeable berm capable of containing at least 125 percent of the stored volume or comprise a double walled tank protected from accidental rupture by barriers capable of preventing heavy equipment and/or vehicle access (with the exception of the fuel truck); all containment areas will be covered to prevent the capture and containment of rain water;
- refuelling of equipment will only be undertaken by personnel trained for this work;
- all refuelling of all equipment will only be undertaken with immediate access to a spill response kit;
- storage containers will be inspected daily for leaks and/or other structural deficiencies;
- stationary equipment will be inspected on a daily basis for structural deficiencies;
- stationary equipment with fuel tank capacity exceeding 25 litres will be placed within a tray capable of containing at least 125 percent of the volume of the fuel tank; trays will be covered to prevent the capture and containment of rain water; and,
- spill event reporting (Emergency and Spill Response Plan) will be implemented immediately in the event of a spill.

Concrete

The Contractor will conduct all construction activities involving the use of concrete, cement, mortar and other Portland cement or lime-containing construction materials in a manner that prevents sediments, debris, concrete (cured or uncured), and concrete wastewater from being deposited into the Fraser River or the landside drainage system. Containment will be provided for concrete wastewater and solid concrete waste. Concrete wastewater associated with the wash down of concrete trucks will be contained within the concrete truck and transported back to the batch plant for reuse.

Hazardous Materials

The proper management of hazardous materials mitigates the risk for spills of hazardous material that may be associated with the Project. Measures to mitigate the risk for spills, and the overall management of hazardous materials, are as follows:

- hazardous waste containers will be leak-resistant, possess removable tops, kept upright, and kept closed except when being filled or emptied;
- each container or areas used to store hazardous waste will be clearly labeled as containing hazardous waste;

- each container or areas used to store hazardous waste will be equipped with secondary containment sufficient to contain the entire volume of waste;
- hazardous waste storage areas will be checked weekly and a corresponding log will be kept; waste disposal will be recorded on the waste disposal tracking sheet;
- a Waste Stream Profile form will be prepared by the Contractor for each hazardous waste and kept on file at the relevant site office;
- training records for those involved with the handling and transportation of hazardous waste will be kept at the relevant site office;
- hazardous waste will be managed in compliance with applicable fire codes;
- hazardous materials including, but not limited to, fuels, bitumens, solvents, cleaners, used fuel and oil filters, and other construction materials will be stored and handled to minimize loss and to allow containment and recovery in the event of a spill;
- the Contractor will designate area(s) for the transfer and temporary storage of hazardous materials and waste; land-based storage is to be at least 30 metres away from the mean high-water elevation of the Fraser River and the storm water drainage system; there will not be marine-based storage of hazardous materials; land-based storage area(s) will be clearly delineated by signage and appropriately managed;
- the Contractor will promptly remove hazardous waste and/or hazardous materials from the Project location that are not in active use;
- the Contractor will be responsible for maintaining proper Workplace Hazardous Materials Information Systems (WHMIS) labels and Safety Data Sheets (SDS) for all hazardous materials used and stored onsite; and,
- hazardous waste generated by the Contractor during the course of construction activities will be disposed of in accordance with the Hazardous Waste Regulation of the *Environmental Management Act* (British Columbia); waste includes, but is not limited to, waste oils, greases, lubricants, solvents, batteries, and used spill clean-up materials.

Should you require further information regarding this correspondence, please contact me at 604-312-2406 or adams@envirowest.ca.

Yours truly,
ENVIROWEST CONSULTANTS INC.

Mark A. Adams, R.P.Bio.
Director

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