



Standard Operating Procedure

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Department: Environment	Owner: Sylvie St. Jean

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Rev A	October 26, 2017	Carolyn Winik	Updated format and Spill Reponse chart.
Rev 1	January 31, 2018	Carolyn Winik	Issued for Approval.
Rev 2	February 12, 2018	Jono Irwin	Updated Flow Charts.
Rev 3	May 22, 2018	Carolyn Winik	Updated Call List and Spill Reporting Form.
Rev 4	June 26, 2020	Carolyn Winik	Updated Section 6 and all Appendices.

Approvals

Title	Name	Signature	Date
Environment Manager	Sylvie St. Jean		June 26, 2020

	ENV-SOP-0002 Environmental Department Spill Reporting Procedure
Department: Environment	Status: Approved
Review Frequency: Annual	Date Approved: June 26, 2020

1.0 Purpose

The purpose of the following document is to clarify spill reporting responsibilities of the Environmental Department for the Rainy River Mine including spill tracking and external required reporting. This document is designed to be consistent with Federal and Provincial Reporting Regulations, Corporate Standards for spill reporting (EMS Standard 008.01) and aligned with Site Wide Spill Reporting Policy ENV-POL-0001. Spill response requirements and responsibilities for those working on the Rainy River Mine can be found in ENV-SOP-0001.

2.0 Scope

This procedure is an outline of the spill reporting responsibilities for the Environmental Department.

3.0 Definitions

3.1 Spill

A spill is defined as a “spill”, when used with reference to a pollutant, and means a discharge:

- (a) into or onto the natural environment,
- (b) from or out of a structure, vehicle or other container, and
- (c) that is abnormal in quality or quantity in light of all the circumstances of the discharge.

Spills requiring reporting under this requirement do not include approved discharges such as discharges to air, water and land approved under the Environmental Protection Act (EPA) or other regulatory approval provided the discharge is compliant with the approval.

Spill volume is the amount of material that contacted the environment (ground, water or air).

3.2 Mine Site

The Mine Site is defined as;

- All project components within the ESA boundary;
- Highway 600 from Hwy 71 to Seven Bends;
- Teeple Road from Hwy 71 to Hwy 600;
- Municipal roads used for access including but not limited to Teeple Road, Roen Road, Korpi Road and Eluik Road.

4.0 Responsibilities

4.1 Rainy River General Manager

- Ensures a process is in place for reporting Environmental incidents.
- Reviews and signs Regulatory Incident Reports before submission to Government Agencies.

4.2 Rainy River Environment Manager

- Approves this policy and ensures its communication to site personnel.
- Oversees the Environmental Department to ensure compliance with this procedure.
- Is responsible to ensure reportable spills are communicated appropriately to Regulatory bodies in line with approvals and reporting requirements.

4.3 Environmental Department

- Provide support to Rainy River personnel and contractors in regard to spill response and reporting, including sampling where necessary.
- Maintains an on call schedule to ensure support is provided to mine personnel 24 hours a day.
- Contacts the Spill Action Centre as a first contact after a reportable spill.
- Compiles incident details and composes Regulatory Incident Report detailing incidents to Regulators.
- Maintain a registry of all spills.
- Distribute spill information to authorized internal and external stakeholders.

4.4 Area Managers

- Support the procedure and ensure departmental staff follow its expectations.
- Ensure departmental Supervisors are trained to lead the spill response within their crews and are familiar with the external reporting thresholds.
- Support any follow up investigations as required.
- For spills in their respective areas, reviews and signs Regulatory Incident Reports before submission to Government Agencies.

5.0 Guideline and Instructions

5.1 Regulatory Reporting

Externally reportable spills exceeding mandatory reporting thresholds of O. Reg 675/98 (Table 1) and spills on third party property within the mine site (e.g., municipal roads, Hwy 600, Table 2):

- Environmental Manager or designate to follow “Environmental Reportable Incident Call List” Appendix 3.
- The Manager or designate will contact the Spills Action Center at 1-800-268-6060 and report:
 - your name and phone number
 - name and phone number of the person or company in control of the product spilled

- date, time and location of the spill
 - duration of the spill (if known) and whether the spill is ongoing
 - type and quantity of pollutant spilled, including hazard level or toxicity information
 - source of the spill and information on the cause
 - description of adverse effects i.e. waterbodies
 - environmental conditions that affect the spill (weather, traffic, etc.)
 - actions being taken to respond i.e. contain, clean up
 - other agencies and parties responding
- A Regulatory Incident Report detailing the incident must be submitted via a transmittal to Regulatory bodies within the time frames detailed below. The report must include:
 - The measures that were taken to mitigate the effects of the occurrence;
 - If an emergency response plan was implemented, details concerning its implementation; and
 - Changes made to avoid a subsequent occurrence of the accident or malfunction (corrective actions).
 - MECP within 7 days of incident.
 - MNRF within 7 days of incident, if TSS or Fisheries related.
 - DFO within 30 days of incident.
 - ECCC within 30 days of incident.
 - IAAC within 30 days of incident.
 - New Gold Environmental Department INX Moderator will update the spill incident in INControl consistent with O.Reg 675/98 when Spill Report Form is received.
 - Classify incidents according to the NG Risk Consequence categories (Level 1, 2 or 3) as per 008.04 Incident Assessment and Response Matrix

5.2 Follow up Investigation

- Following the initial incident and once clean-up has been completed, a follow-up investigation of the incident will occur as per area Manager's request. This will be led by the Supervisor responsible for the area in which the spill occurred with the support of The Environmental Department.
 - The investigation should include all information required for the Regulatory Incident Report as detailed above and focus on implementing measures to reduce the chance of reoccurrence
- Root cause analysis is required for all significant incidents. Spills which require this as per 002.06_CORPORATE ESR INCIDENT REPORTING GUIDELINES are:
 - Cyanide spills outside of normal processing area.
 - Hydrocarbon spills that trigger requirement to report to regulatory authorities.
 - Other spills that trigger requirement to report to regulatory authorities.

Table 1: Reportable Levels for Different Substances (off municipal/provincial roads) (O.Reg 675/98)	
Substance Spilled	Reporting Threshold
Refrigerants (as listed in O Reg 189/94)	100 Kg
Hydrocarbons <ul style="list-style-type: none"> • Gasoline • Petroleum products 	100 L, any if into water
Electrical utilities (excluding PCB's) <ul style="list-style-type: none"> • Oil from Transformers 	100 L, any if into water
Dangerous goods (as listed in TDG act)	<i>See TDG Act Schedule 1 for complete list</i>
Class 1, Explosives	10 kg, any quantity that poses a public risk
Class 2, Gases <ul style="list-style-type: none"> • SO₂ 	Any release of 10 + minutes, any quantity that poses a public risk
Class 3, Flammable Liquids	200 L, any if into water
Class 4, Flammable Solids/Water-Reactive Substances	25 kg, any if into water
Class 5.1, Oxidizing Substances <ul style="list-style-type: none"> • O₂ 	50 kg/ 50 L
Class 5.2, Organic Peroxides	1 kg/ 1
Class 6, Toxic Substances <ul style="list-style-type: none"> • Cyanide, Copper Sulfate, Sodium Metabisulfite 	5 kg/ 5 L
Class 6.2, Infectious Substances <ul style="list-style-type: none"> • N/A 	Any quantity
Class 7, Radioactive Materials <ul style="list-style-type: none"> • Nuclear Devices 	Any quantity that poses a public risk
Class 8, Corrosives <ul style="list-style-type: none"> • Hydrochloric Acid, Sodium Hydroxide, Lime 	5 kg/ 5 L
Class 9, Miscellaneous Products, Substances or Organisms	25 kg/ 25 L
Tailings	Any Amount is reportable
Emulsion	Any Amount is reportable

Table 2: Exemptions for spill reporting on Highways	
Description	
Less than 100 L of fluid other than other than fluid transported as cargo, from the fuel system or other operating system of a motor vehicle.	
the spill does not enter and is not likely to enter any waters, as defined in the Ontario Water Resources Act, directly or through drainage structures	
the spill does not cause and is not likely to cause any adverse effects, other than those that are readily remediated through cleanup and restoration of surfaces that are prepared for vehicular traffic or paved, graveled, sodded areas adjacent to those surfaces	
Arrangements for the remediation referred to in clause (c) are made and carried out immediately.	

6.0 Documentation

The Spill Report Form is to be completed by Supervisor or Designate of the area in which the spill occurs.

For New Gold Departments only, the incident details are to be entered into INControl software by the supervisor or designate as soon as possible and before shift end.

The Environment Moderator will update INControl consistent with O. Reg 675/98.

A follow up report is to be sent to the following agencies within the time frames specified below: Ministry of the Environment and Climate Change (MECP) - Within 7 Days

Ministry of Natural Resources and Forestry (MNR) – Within 7 Days

Environment Canada (ECCC) – Within 30 Days

Department of Fisheries and Oceans (DFO) – Within 30 Days

Impact Assessment Agency of Canada (IAAC) – Within 30 Days

Annually, the Environmental Department will conduct Spill Audits on 10% of reported spills as per ENV-SOP-0006.

Root Cause Analysis completed on all externally reportable spills as per EMStd-008.1 Incident and Crisis Management.

7.0 Reference Table

Ontario Pollution and Spills Reporting

<https://www.ontario.ca/page/report-pollution-and-spills>

O. Reg 675/98: Classification and Exemption of Spills and Reporting of Discharges:

<https://www.ontario.ca/laws/regulation/980675>

002.06_Corporate ESR Incident Reporting Guidelines

8.0 Appendices

Appendix 1: Environmental Department Spill Response Flow Chart

Appendix 2: Spill Reporting Form

Appendix 3: Environmental Reportable Call List

Appendix 1: Environmental Department Spill Response Flow Chart

ENVIRONMENTAL DEPT. SPILL RESPONSE

June 26, 2020

Spill reported to Environmental Department via radio, phone or Rainy River Enviro mailbox



- Ensure Spill Reporting Form, Attachment 2, is completed and sent to rainyriver.enviro@newgold.com and rainyriver.incident@newgold.com.
- INX Environmental Moderator to update Site Spill Log in INControl.



Follow Environmental Reportable Incident Call List Attachment 3



- Draft Regulatory Incident Report (follow previous letter templates)
- Have report reviewed by Enviro team member, Environmental Manager or designate and signed by spill area Manager and General Manager.



- Email letter to Matt Hoffmeister (MECP) matt.hoffmeister@ontario.ca within 7 days and copy jason.tittlemier@ontario.ca
- If TSS/Fisheries related, email letter to Christine Kent (MNRF) within 7 days Christine.Kent@ontario.ca
- Email letter to Lucas Coletti(DFO) within 30 days lucas.coletti@dfo-mpo.gc.ca
- Email letter to Melissa Hagmann (ECCC) within 30 days melissa.hagmann@canada.ca
- Email letter to IAAC within 30 days iaac.compliance-conformite.aeic@canada.ca

Appendix 2: Spill Reporting Form



SPILL REPORTING FORM

Date of reporting:		Time of reporting:	
Person first observing spill/witness;		Weather:	
Employer/Contractor associated with spill;			
Date of spill:	Time of Spill:	Duration of spill:	
Type of spilled material:			
Volume spilled:			
Spill location and address:			
Distance to, and nature of, nearest sensitive receptors (watercourse, 3 rd party, residence):			
Did any spill flow into watercourse or drainage? Yes <input type="checkbox"/> No <input type="checkbox"/>			
Action taken, status of clean up and success of clean up:			
Volume of contaminated material removed from site:			
Type of contaminated material removed from site:			
Method of disposal (attach photos to document cleanup):			
Description of spill/Activity at time of spill:			
Equipment or source of spill (make/model/ID):			
Preliminary assessment of cause: Mechanical Failure <input type="checkbox"/> Impact/Collision <input type="checkbox"/> Procedural error <input type="checkbox"/> MVA <input type="checkbox"/> Other (describe) <input type="checkbox"/>			
Items used from spill kit:		kit replenished: <input type="checkbox"/> Y <input type="checkbox"/> N	
Preliminary corrective actions/mitigation:			
Report completed by:		Contact information:	
Title/Company:		Date:	

REPORT ALL SPILLS IMMEDIATELY TO CREW SUPERVISOR

NEWGOLD CREW SUPERVISOR TO REFERENCE SPILL REPORTING PROCEDURE ENV-SOP-0001

CONTRACTOR CREW SUPERVISOR TO REFERENCE SPILL REPORTING PROCEDURE ENV-SOP-0007

CONTACT NEWGOLD ENVIRONMENT IMMEDIATELY FOR ASSISTANCE 1-807-632-6152

Email completed form to rainyriver.enviro@newgold.com and rainyriver.incident@newgold.com

Appendix 3: Environmental Reportable Call List

Person Reporting: _____

Date: _____

Time: _____

Contact Group:		
Environmental Manager, Sylvie St. Jean C- 807-707-3497	Yes _____	No _____
Environmental Manager will contact Regulatory Point of Contact (GM) Eric Vinet C- 416-881-7405		
Community Relations Manager, Renee Boucher C- 807-707-4899	Yes _____	No _____
Area Manager of Location of Spill Manager Contacted: _____	Yes _____	No _____
<u>Spills Action Center (SAC)</u> 1-800-268-6060 (Within 24 hours of spill/exceedance)	Yes _____	No _____
SAC Reference # _____		
<u>Matt Hoffmeister (MECP)</u> T- 807-468-2703 or <u>Jason Tittlemier</u> T 807-468-2758	Yes _____	No _____
Only call if necessary:		
<u>Melissa Hagmann (ECCC)</u> T-613-991-0568	Yes _____	No _____
<u>Department of Fisheries and Oceans (DFO)</u> Fisheries Protection 1-855-852-8320	Yes _____	No _____
<u>CANUTEC (TDG)</u> 1-613-996-6666	Yes _____	No _____
<u>Canadian Nuclear Safety Commission</u> 1-613-995-0479	Yes _____	No _____
Company Information:		
New Gold, Rainy River Mine 24 Marr Road Barwick, Ontario POW 1A0 Rainy River District		
* Use the information from the Spill or Exceedance Reporting Form		

Revised June 26, 2020