



newgold ™ Rainy River	Document Number: ENV-SOP-0002	Revision: 05	Status Approved	Date: 2023-MAR-15
Document Title: Environmental Department Spill Reporting Procedure	Author: C. Winik	Checker: N. Baird	Approver: Garnet Cornell	Page 1 of 9

ENV-SOP-0002
Environmental Department Spill Reporting Procedure

Revision History						
Revision Index	Revision Date	Status	Author	Checker	Approver	Comments
A	[2017-OCT-26]	Approved	Carolyn Winik			Updated Format and Spill response chart
01	[2018-JAN-31]	Approved	Carolyn Winik			Issued for Approval
02	[2018-FEB-12]	Approved	Jono Irwin			Updated Flow Charts
03	[2018-MAY-22]	Approved	Carolyn Winik			Updated Call List and Spill Reporting Form
04	[2020-JUN-26]	Approved	Carolyn Winik			Updated Section 6 and all Appendices
05	[2023-MAR-15]	Draft	Carolyn Winik	Nathan Baird	Garnet Cornell	Review

Approvals			
Title	Name	Signature	Date
Environmental Superintendent	Garnet Cornell		Mar 29, 2023

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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 Responsibilities & Accountabilities

3.1. Rainy River Environmental Superintendent

- 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.

3.2. 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 in the event of an externally reportable spill.
- Compiles incident details and composes Spill Action Center Reference Report detailing incidents to Regulators.
- Maintain a registry of all spills.
- Distribute spill information to authorized internal and external stakeholders.


4.0 Guidelines and Instructions

4.1. 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):

- The Superintendent or designate will contact the Spills Action Center at 1-800-268-6060 and informs SAC of the spill, some questions they may ask include but are not limited to the following:
 - your name and phone number

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- date, time and location of the spill
- duration of the spill (if known), whether the spill is ongoing and the estimated volume of the substance lost
- type and quantity of substance spilled, including hazard level or toxicity information
- Cause of the spill
- description of adverse effects i.e. Fish bearing waterways, vegetation
- environmental conditions that affect the spill (weather, traffic, etc.)
- actions being taken to mitigate effect of the spill i.e. contain, clean up
- A Spill Action Center Reference Report detailing the incident must be submitted via a transmittal to Regulatory bodies within the time frames detailed below. The report must include:
 - The cause of the incident
 - The substance lost, the volume (can be an estimate) of the substance lost and its potential effect to the receiving environment
 - The potential for that substance to leave Mine owned or controlled property
 - 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).
 - See previous reports for reference/template
 - MECP within 7 days of incident.
- A MDMER Section 31 Report is required detailing much the same as above for events that have or have the potential to migrate outside of the control of the Mine. This type of report is required most often with unplanned discharges (spill of effluent away from a permitted discharge point), unauthorized discharges (discharge of effluent through a permitted discharge point the should not have occurred) or a deposition of a deleterious substance (exceedance of effluent objectives under federal effluent limits or a spill that could/did reach fish bearing waters). See previous reports for reference/template.
 - 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 INX 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

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4.2. 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 • Cyanide, Copper Sulfate, Sodium Metabisulfite	5 kg/ 5 L
Class 6.2, Infectious Substances • N/A	Any quantity
Class 7, Radioactive Materials • Nuclear Devices	Any quantity that poses a public risk
Class 8, Corrosives • 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.

5.0 Definitions

Term	Definition
Spill	<p>A spill is defined as a “spill”, when used with reference to a pollutant, and means a discharge:</p> <ul style="list-style-type: none"> (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. <p>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.</p> <p>Spill volume is the amount of material that contacted the environment (ground, water or air).</p>
Mine Site	<p>The Mine Site is defined as;</p> <ul style="list-style-type: none"> • All project components within the ESA boundary; • Any other area where RRM staff are performing mine related tasks

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 INX InControl software by the supervisor or designate as soon as possible and before shift end.

The Environment Moderator will update INX 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
- Environment Canada (ECCC) – Within 30 Days
- Department of Fisheries and Oceans (DFO) – Within 30 Days
- Impact Assessment Agency of Canada (IAAC) – Within 30 Days

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

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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

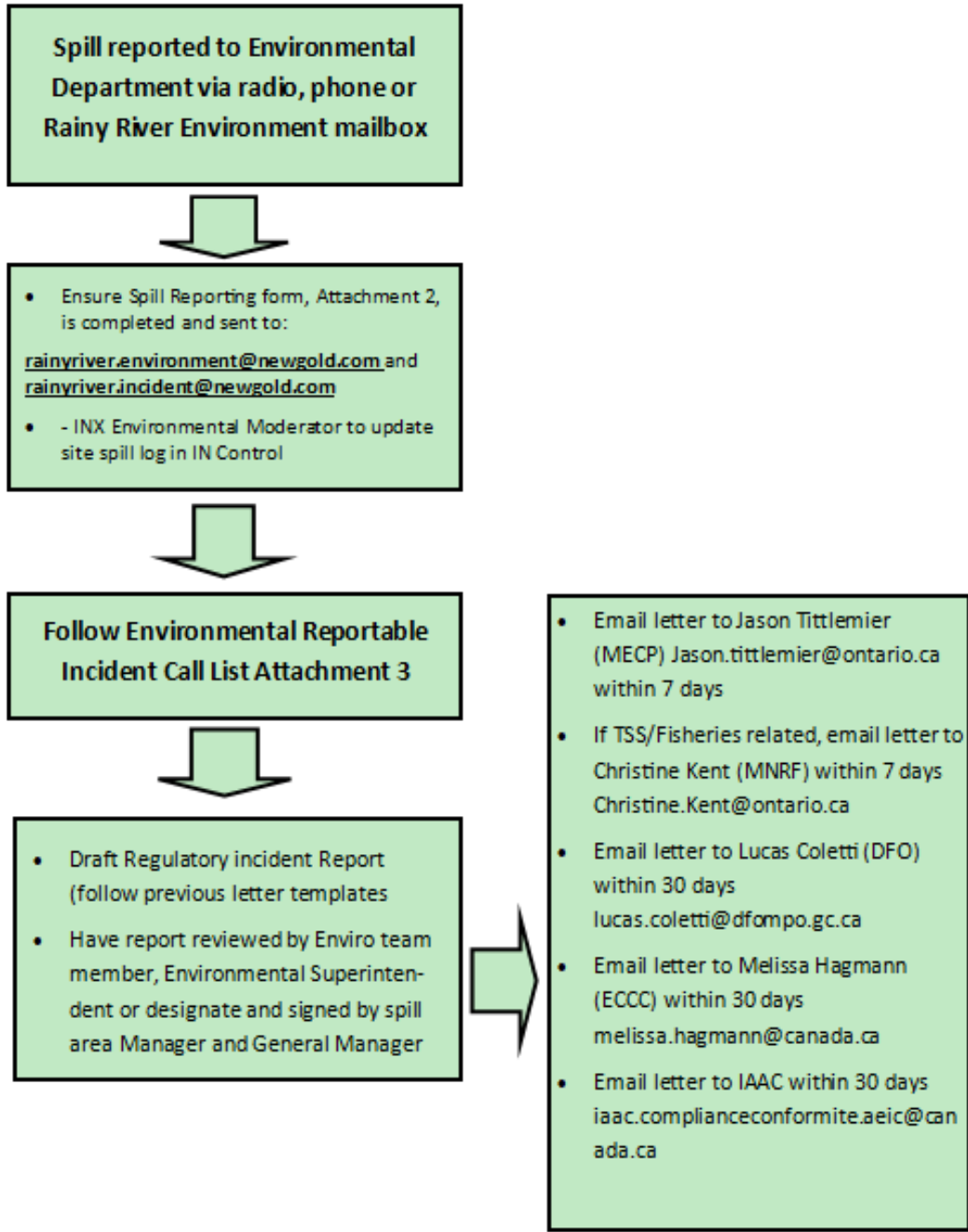
- Appendix 1: Environmental Department Spill Response Flow Chart
- Appendix 2: Spill Reporting Form

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Appendix 1: Environmental Department Spill Response Flow Chart

ENVIRONMENTAL DEPT. SPILL RESPONSE

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Appendix 2: Spill Reporting Form



SPILL REPORTING FORM

Date of reporting: <input type="checkbox"/>		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 copy of documentation):		
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

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

CONTACT NEWGOLD ENVIRONMENT IMMEDIATELY IF SPILL IS EXTERNALLY REPORTABLE

1-807-632-6152

Email completed to rainyriver.environment@newgold.com and rainyriver.incident@newgold.com

For New Gold Departments only, incident details to be entered into INControl software within 24 hours of the occurrence by the Supervisor or Designate.

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ENV-SOP-0002 Rev 5

Final Audit Report

2023-03-29

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