November 17, 2015

Director
Environmental Assessment Licensing Branch
Manitoba Conservation
Suite 160, 123 Main Street
Winnipeg, Manitoba
R3C 1A5

Attn: Ms. Tracy Braun

Re: Dangerous Goods Handling and Transportation Application for the Re-Location of Direct LP's Waste Lead Acid Battery Transfer Station, Cross Dock and Maintenance Shop to 490 Lucas Avenue, RM of Rosser, Manitoba

Dear Ms. Braun,

Please find enclosed a completed Dangerous Goods Handling and Transportation Application for the re-location of Direct LP's Waste Lead Acid Battery Transfer Station (currently located at 55 Rothwell Road, Winnipeg), Cross Dock (currently located at 47 Gomez Street, Winnipeg) and Maintenance Shop (currently located at 100 Higgins Avenue, Winnipeg) to 490 Lucas Avenue located in the RM of Rosser, Manitoba.

An environmental assessment of the area was conducted in October 2015 and results of the environmental assessment have been provided in the enclosed Environmental Assessment report.

Also included in the package is a cheque for $250.00 for the licence application as per the Dangerous Goods Handling and Transportation Fees Regulation (Manitoba Regulation 164/2001) for Hazardous Waste Storage, Handling and/or Treatment.

If you have any questions please feel free to contact me at 204-926-2552.

Sincerely,

Evelyn Anderson

Ms. Evelyne Anderson
National Fuel Tax & Compliance Manager
Direct LP
47 Gomez Street
Winnipeg, MB R3B 0G4
Ph: 204-926-2552

Dangerous Goods Handling and Transportation Act Application Form

Manitoba
Conservation and Water Stewardship

Name of facility: Lucas Waste Lead Acid Battery Transfer Station	
Legal name of the applicant of the facility: Direct General Partner Corporation on behalf of Direct LP	
Location (street address, city, town, municipality, legal description): 490 Lucas Avenue, RM of Rosser, Manitoba	
Name of proponent contact person for purposes of the environmental assessment: Evelyne Anderson	
Phone: 204-926-2552 Fax: 204-947-3083	Mailing address: 47 Gomez St. Winnipeg, MB. R3B 0G4
Email address: Evelyne_Anderson@canadacartage.com	
Webpage address: www.canadacartage.com	
Date: November 17, 2015	Signature of person representing the legal applicant Evelyne Anderson Printed name: Evelyne Anderson

A complete Dangerous Goods Handling and Transportation Act application consists of the following components:

- **Cover letter**
- **Dangerous Goods Handling and Transportation Act Application Form**
- **Reports/plans supporting the application***
- **Application fee** (Cheque, payable to Minister of Finance, for the appropriate fee)

Per Dangerous Goods Handling and Transportation Fees Regulation (Manitoba Regulation 164/2001):

Hazardous Waste Storage, Handling and/or Treatment $250

Submit the complete application to:

Director
Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
Suite 160, 123 Main Street
Winnipeg, Manitoba R3C 1A5

For more information:
Phone: (204) 945-8321
Fax: (204) 945-5229
http://www.gov.mb.ca/conservation/eal

*The required information, as well as the quantity and types of copies required, are as described in Information Bulletin - Environment Act Proposal Report Guidelines. The applicant should also take facility impacts on environmental and human health into consideration.

GENERATOR REGISTRATION AND CARRIER LICENCING REGULATION M.R. 175/87

HAZARDOUS WASTE REGISTRATION FORM

Manitoba
Conservation and Water Stewardship

Check all that apply: ☐ New Company ☐ Name Change ☒ Moved ☐ Additional Site ☐ Update

Section 1 Generator Identification

Generator (Legal Name): Direct General Partner Corp on behalf of Direct LP **Corp. File # if app.:** 5242771

Mailing Address: 47 Gomez St. **City:** Winnipeg **Prov.** MB **Postal code** R3B 0G4

Operation Name: Direct Fleet Management/ Canada Cartage System **Site Location:** 490 Lucas Ave, RM of Rosser, MB

Operation Mailing Address: 47 Gomez St. **City** Winnipeg **Prov.** MB **Postal Code** R3B 0G4

Section 2 Waste Description

	Physical state	TDG Shipping name	UN Number	TDG Class	Packing Group	Provincial waste class code	Quantity generated per month	Frequency of generation	Treatment/ disposal code
a)	L	waste flammable liquid (mineral Spirits)	1993	3	III	213	35 L	R	X
b)	L	waste environmentally hazardous substance NOS (lead)	3082	9	III	252	1500 L	C	X
c)	S	used oil filters		9	III	252	750 kg	C	X
d)	L	waste lead batteries	2794	8	III	114	36287 kg	C, R	X

Section 3 Waste Management Information

General business type motor carrier; cross dock facility, truck and trailer repair shop

Source of hazardous waste customers used batteries: Walmart Costco, MTS, vehicles being repaired and serviced

Hazardous waste carrier(s) used Direct General Partner Corporation , GFL Environmental Corporation MBC20058

Hazardous waste receiver(s) used K.C.Recycling, Trail, BC; GFL Environmental Corporation MBR 04811

Section 4 Certification

I certify that the information provided on this form is correct and complete.

Signature of Contact Person with the Operation: Evelyne Anderson Date (dd/mm/yy): 17/11/2015

Print Name of Contact Person: Evelyne Anderson Position/Title: National Fuel Tax & Compliance Manager

Telephone :204-926-2552 Fax : 204-947-3083

For departmental use only : Region

MBG Business Code Form checked by Form processed by

Personal information is collected under the authority of the *Dangerous Goods Handling and Transportation Act*, *Generator Registration and Carrier Licencing Regulation* M. R. 175/87, and will be used to issue the Hazardous Waste Registration Number (Provincial ID number) and for administration and enforcement purposes. It is protected by the privacy provisions of *The Freedom of Information and Protection of Privacy Act*. If you have any questions, contact the Access & Privacy Co-ordinator, Box 85, 200, Saulteaux Crescent, Winnipeg MB R3J 3W3; 1 (204) 945-4170.

ENVIRONMENTAL ASSESSMENT REPORT

RELOCATION OF WASTE LEAD ACID BATTERY TRANSFER STATION, CROSS DOCK AND MAINTENANCE SHOP

490 Lucas Ave.
RM of Rosser, Manitoba

Submitted to:

Direct LP
47 Gomez St.
Winnipeg, Manitoba
R3B 0G4

Attention: Evelyne Anderson,

National Fuel Tax & Compliance Manager

Submitted by:

Amec Foster Wheeler Environment & Infrastructure
a Division of Amec Foster Wheeler Americas Limited
440 Dovercourt Drive
Winnipeg, Manitoba
R3Y 1N4

Amec Foster Wheeler Project Number: WX17773
November 2015

EXECUTIVE SUMMARY

Direct LP authorized Amec Foster Wheeler Environment & Infrastructure (Amec Foster Wheeler) to complete an Environmental Assessment (EA) Report for the proposed relocation of the waste lead acid battery transfer station at 55 Rothwell Road in Winnipeg, Manitoba, truck and trailer repair shop at 100 Higgens Avenue in Winnipeg, Manitoba, and cross dock facility at 47 Gomez Street in Winnipeg, Manitoba to 490 Lucas Ave in the RM of Rosser, Manitoba. This Environmental Assessment will support the application that will be submitted by Direct LP to Manitoba Conservation to receive a licence for the storage and transfer of waste batteries under the Dangerous Goods Handling and Transportation (DGHT) Act.

Project Description and Existing Land Use

Direct LP is applying for an Environment Act license for the proposed project site (the Site) which would allow them to relocate their existing location to temporarily store and transfer waste batteries, including their truck and trailer repair shop and cross dock facility. Waste batteries would be picked up from various customers and brought into the warehouse to be packaged and palletized. Once this is completed, the packaged batteries would then be loaded onto a truck / trailer, for short-term storage (Figure 2). When the trailers are at capacity, they would then be dispatched out to the recyclers, either in British Columbia or Ontario. In the event that pallets of batteries were delivered late in the day, they would be stored in the warehouse prior to being moved onto the trailers the following day. The facility will have the capacity to store two to three trailers of waste lead acid batteries per week totalling approximately 55,000 kg.

The proposed project site is located at the northwest junction of Lucas Ave and Brookside Blvd. in the RM of Rosser, Manitoba. The current owners of the proposed project site on which the proposed waste battery transfer and handling site is to be relocated is Direct Distributors. According to the RM of Rosser's CentrePort Zoning By-law 10-14, the Site and adjacent properties are zoned as Industrial General Zone (12).

The Site is currently developed with a large commercial building divided into two story office spaces, a cross dock area and a maintenance building. The surrounding land consists of manufacturing properties, and commercial uses, described below.

Potential Effects and Mitigation

The potential for species for fauna and flora species to be present on site in negligible due to the Site being disturbed by an existing commercial facility and the presence of surrounding commercial, manufacturing and retail facilities adjacent to the Site. There is the potential for amphibians and reptiles to be present in the drainage ditches located adjacent to the Site, but no effects are anticipated as the proposed waste battery transfer station will not affect the drainage ditches.

There are no water bodies, municipal, provincial or federal parks, First Nation lands, schools or heritage sites located on or adjacent to the Site. Two Canadian National (CN) rail lines are located approximately 350 metres south of the proposed site. The nearest residential area is located

approximately 450 metres on the east side of the project site. The proposed waste transfer battery station will not affect the existing CN rail lines or the residential area.

There is the potential for air emissions to be produced from the operation of the proposed waste battery handling and transfer station. These emissions include those that may be generated from the facility heating and cooling system and those generated by increased truck traffic transporting the waste batteries. Mitigation measures to reduce these potential effects include, ensuring the heating and cooling systems are properly maintained as well as inspected and serviced when not in proper working order and ensuring transport vehicles for the waste batteries are maintained and in proper working condition. It is anticipated that potential effects as a result of air emission from the project are negligible.

The operation of the proposed waste battery handling and transport depot will have no effects on the climate or greenhouse gas emissions. Although there is the potential for a slight increase in traffic in the area, the number of trucks transporting the waste batteries and exhaust produced will be minimal in comparison to the existing and new traffic that is generated from the existing industrial, commercial and retail development surrounding the Site.

There is the potential for additional noise to be generated from the slight increase in truck traffic that will be generated as a result of the proposed waste battery facility. Given the location of the facility in existing industrial area with other industrial, manufacturing, commercial and retail developments surrounding the Site, and distance to the nearest residential property of approximately 450 m, effects from noise emissions are considered negligible.

Increased traffic may result from the addition of transport trucks used for the delivery and hauling away of the waste batteries. It is anticipated that the number of additional vehicles/trucks will be minimal in comparison to the existing and new traffic that is generated from the existing industrial, commercial and retail development surrounding the Site. The development of a waste storage and handling warehouse may have a positive effect by way of job creation and employment. Surrounding amenities such as restaurants can benefits from the additional employees that may be required for the waste battery transfer station.

There is the potential for spills to occur as a result of the storage and transfer of hazardous materials on site. Spills or leakage from machinery (i.e, forklifts) may also occur. Potential effects from spills are considered negligible if the following mitigation measures are followed: maintenance of equipment; proper storage of hazardous materials; adherence to all contingency; emergency, and fire safety plans.

There are no anticipated residual effects as a result of the proposed waste battery transfer station.

Follow-up Plans

Direct LP will ensure that the Hazardous Waste Management Contingency Program – Batteries, Emergency Response Plans, and Fire Safety Plans Procedures outlined in Appendix C, F and G respectively, are reviewed, understood and adhered to by all personnel working in the waste battery

transfer station. In addition, Direct LP will adhere to the procedures outlined in Appendix D: How to properly stack used batteries on pallets" to properly store waste batteries.

As the project is not anticipated to cause any effects to the biophysical or socio-economic environments adjacent to the Site, no follow-up plans or monitoring plans are required.

Conclusion

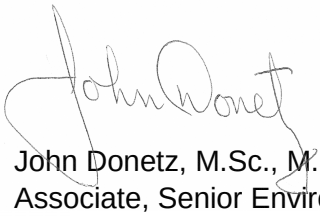
As a result of the project location (industrial general use), current existing environment of the Site (commercial facility) and adherence to the contingency plans (including emergency response, fire safety and storage of batteries) developed by Direct LP for the waste battery transfer station, it has been determined there will be no environmental effects as a result of the proposed project.

SIGNATURE PAGE

Report Prepared by:

Kerri-Lyn Szwaluk, M.Sc., P.Ag.
Senior Environmental Planner
Amec Foster Wheeler
Environment & Infrastructure

Report Review By:



John Donetz, M.Sc., M.S.B.
Associate, Senior Environmental Scientist
Amec Foster Wheeler
Environment & Infrastructure

TABLE OF CONTENTS

LIST OF APPENDICES

LIST OF FIGURES

1.0 INTRODUCTION

Ms. Evelyne Anderson of Direct LP authorized Amec Foster Wheeler Environment & Infrastructure (Amec Foster Wheeler), to complete an Environmental Assessment (EA) Report for the proposed relocation of a waste lead acid battery transfer at 55 Rothwell Road in Winnipeg, Manitoba, truck and trailer repair shop at 100 Higgens Avenue in Winnipeg, Manitoba, and cross dock facility at 47 Gomez Street in Winnipeg, Manitoba to 490 Lucas Ave in the RM of Rosser, Manitoba (Figure 1). In addition, Amec Foster Wheeler will compile the necessary permits required for the Dangerous Goods Handling and Transportation Act (DGHTA) Application that will be submitted, along with the Environmental Assessment, to Manitoba Conservation and Water Stewardship for regulatory approval.

2.0 DESCRIPTION OF PROPOSED DEVELOPMENT

2.1 Legal Land Description

The proposed project site is located on the northwest corner of Lucas Avenue and Brookside Blvd. junction in the RM of Rosser, MB. (Figure 2). The current owners of the proposed project site on which the proposed re-location of the waste battery transfer site, truck and trailer repair shop, and cross dock facility is to occur is to be developed by Direct Distributors.

2.2 Current Site Description and Facilities

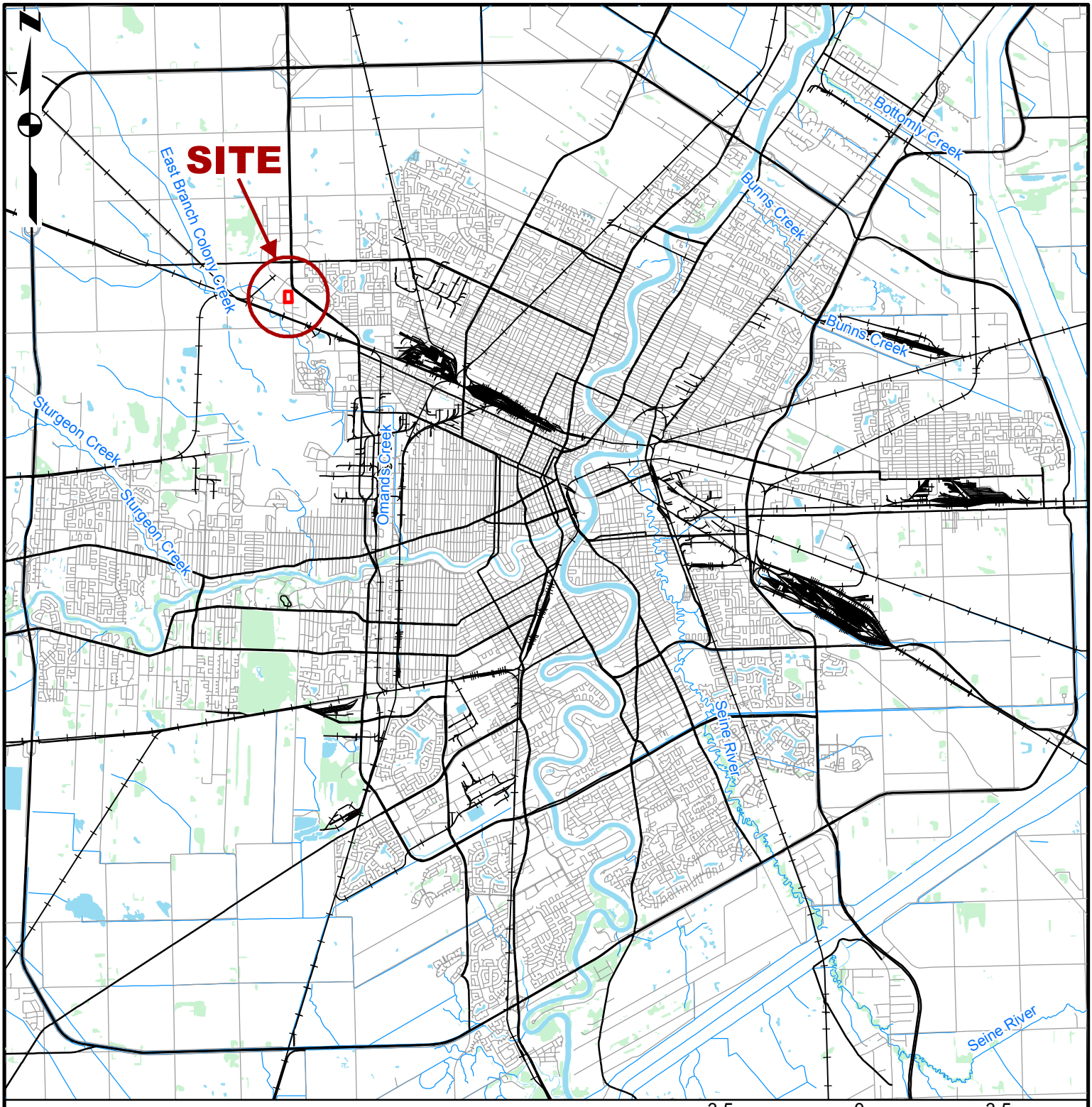
The proposed project site identified for the relocation of the battery waste handling facility, truck and trailer repair shop, and cross dock is located in the northwest corner of the junction of Lucas Ave and Brookside Blvd. in the RM of Rosser, MB (Figure 2). A site reconnaissance was conducted on October 15, 2015 to document facilities found on site and on the adjacent property. Facilities currently developed on the site include a large commercial building divided into two storey office spaces, a maintenance building and cross dock area. The ground surface of the site at the time of inspection was graveled. The surrounding land consists of manufacturing properties, commercial and retail uses, described below.

North: Fleet Brake Auto Repair Shop is located adjacent the Site to the north and Inland Audio Visual is to the northwest, followed by Oak Point Highway.

South: Lucas Avenue is located adjacent to the Site to the south, followed by Murray Kozie Trucking Ltd. And Mack Sales and Services of Manitoba.

East: Brookside Blvd. is located adjacent to the Site to the east, followed by International Pallet, Tri-Core Projects Manitoba Ltd., Uni-Jet Industrial Pipe Service, Red River Siding and Eaves troughs, and Prairie Gear Manufacturing.

West: Directly the west of the proposed site is R& D Trailer Rentals, followed by Thermo King of Mid Canada and Lucas Avenue



LEGEND

- Project Site
- Railroad
- Roads - Major
- Roads
- Watercourse
- Lakes
- Wooded Area

REFERENCE

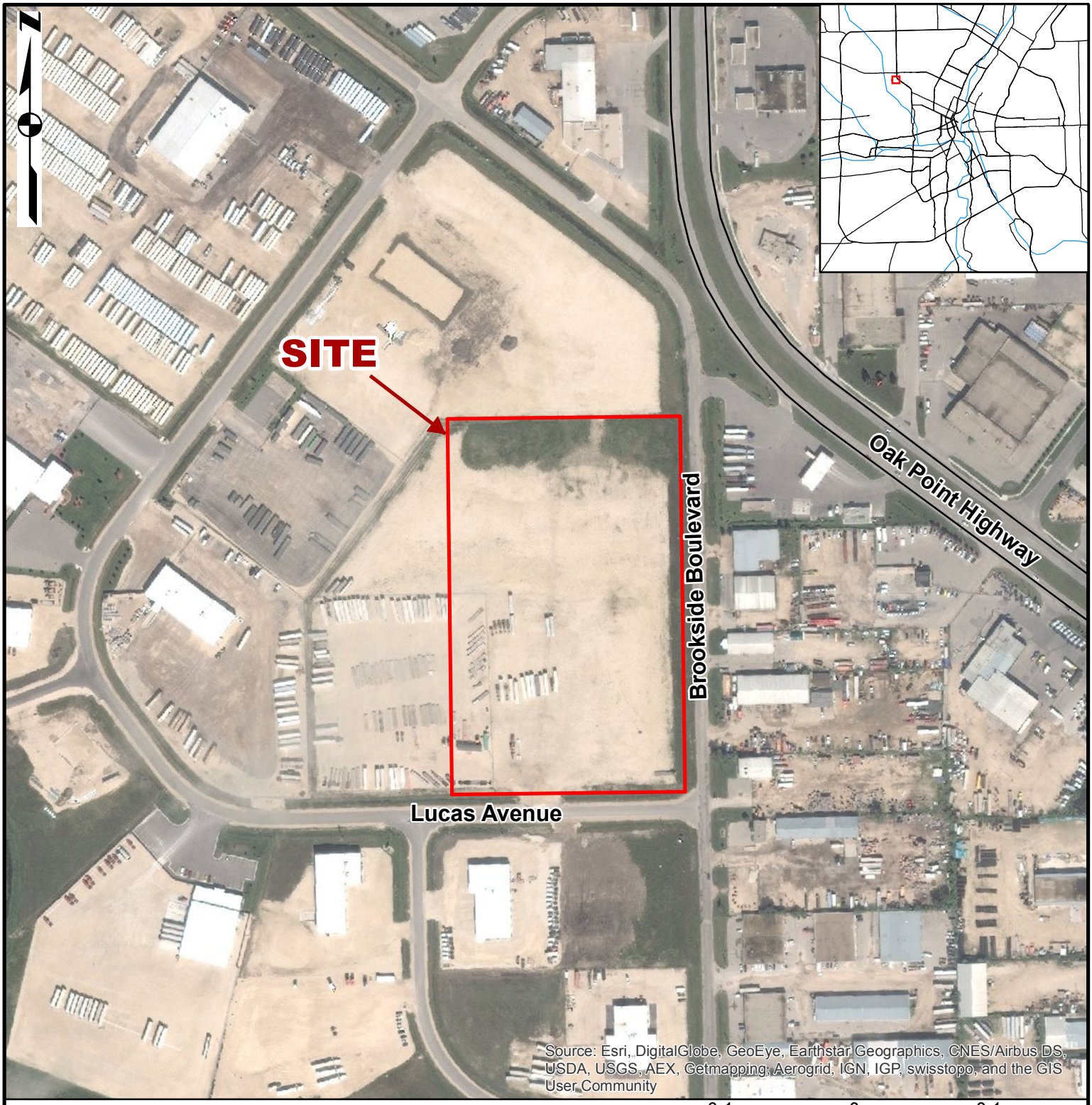
CANVEC © NATURAL RESOURCES CANADA, 2012

Project
490 LUCAS AVENUE
ENIRONMENTAL ASSESSMENT REPORT

Title
REGIONAL PROJECT SITE LOCATION

amec foster wheeler

DWN BY:	REV. NO.:	SCALE:
JJMG	-	AS SHOWN
CHK'D BY:	PROJECT NO.:	DATE:
KL	WX17771	OCT 2015
PROJECTION:		
UTM Zone 14 U		FIGURE: 1
DATUM:		
NAD83		



0.1 0 0.1

SCALE: 1:4,000 km

LEGEND

- Project Site
- Roads - Major

REFERENCE

CANVEC © NATURAL RESOURCES CANADA, 2012

Project	490 LUCAS AVENUE ENIRONMENTAL ASSESSMENT REPORT
Title	PROJECT SITE PLAN

amec foster wheeler

DWN BY: JJMG	REV. NO.: -	SCALE: AS SHOWN
CHK'D BY: KL	PROJECT NO.: WX17771	DATE: OCT 2015
PROJECTION: UTM Zone 14 U		FIGURE: 2
DATUM: NAD83		

The current Certificate of Title for the property can be found in Appendix A. Additional information on the site can be found in the Phase II Environmental Site Assessment prepared for the site (Appendix B) prepared in September 2014. Photographs of the Site taken during the site reconnaissance visit on Oct. 15, 2015 are as follows:

Photograph 1: Looking northwards from south side of the Site on Lucas Avenue

Photograph 2: Looking west from east side of the Site on Brookside Blvd.

2.3 Land Use Designation

According to the RM of Rosser's CentrePort Zoning By-law 10-14, the Site and adjacent properties are zoned as Industrial General Zone (12).

2.4 Proposed Development Use

Direct LP is applying for an Environment Act license for the proposed project site which would allow for the temporarily store and transfer of waste lead acid batteries (Appendix A). Waste lead acid batteries would be picked up from various customers and brought into the warehouse to be packaged and palletized. Once this is completed, the packaged batteries would then be loaded onto a truck/trailer, for short-term storage. When the trailers are at capacity, they would then be dispatched out to the recyclers, either in British Columbia or Ontario. In the event that pallets of batteries were delivered late in the day, they would be stored in the warehouse prior to being moved onto the trailers the following day. The facility will have the capacity to store two to three trailers of waste lead acid batteries per week totalling approximately 55,000 kg.

Direct LP proposes to operate the business during the hours of 8:30 am to 5:00 pm, Monday to Friday. The facility will be operated by staff trained in the transportation of dangerous goods regulations, facility operating procedures and spill cleanup procedures. All semi-trailers used by the company will have spill kits and acid neutralizer to contain any spills. Within the warehouse, spill kits shall be conveniently located for cleanup of spills. A Contingency Plan will be in effect for the Site and has been included in Appendix C.

2.5 Funding

All costs required for the development of the waste battery transfer and handling storage areas would be funded by Direct Distributors (owners of the property).

2.6 Regulatory Permits/Authorizations/Approvals

According to Amec Foster Wheeler's preliminary search, which was limited to that information which is publicly available, the Site is not listed on Manitoba Conservation and Water Stewardship's Hazardous Waste Generators List, Petroleum Storage Tank Registry, Impacted Sites List, or PCB Storage Facility Registry. However, several neighbouring and nearby properties are registered with MCWS's Hazardous Waste Generator Registry, Petroleum Storage Tank Registry, Impacted Sites Registry, and the All Sites List. According to the City of Winnipeg landfill plans, the Brookside Landfill was located approximately 1.25 km east/southeast of the Site. Given the distance of the former landfill to the Site, and given the expected low permeability of the subsurface soil in this area of the City of Winnipeg, impacts to the Site as a result of the former landfill are not expected.

A licence for the proposed facility to store and transfer waste batteries is required under the Dangerous Goods Handling and Transportation (DGHT) Act. This Environmental Assessment will be submitted with the completed licence application and provided to Manitoba Conservation for review and approval.

Any applicable regulations listed in the RM of Rosser CentrePort Zoning By-Law 10-14 will be adhered to. There are no federal legislations applicable to the project.

2.7 Public Advertisement

A notice, describing the development of the proposed waste battery facility, will be published in local newspapers. A thirty day period will be granted to the public to provide comments or concerns on the project to Manitoba Conservation.

3.0 DESCRIPTION OF EXISTING ENVIRONMENT

3.1 Biophysical Environment

3.1.1 Ecological Land Classification

The site identified for the proposed battery storage and transfer area is located in the Prairies Ecozone, Lake Manitoba Plains Ecoregion and the Winnipeg Ecodistrict. The Winnipeg Ecodistrict (849) occupies most of the southeast portion of the Lake Manitoba Plains Ecoregion.

3.1.2 Climate

The Winnipeg ecodistrict is in the most humid subdivision of the Grassland Transition Ecoclimatic Region in southern Manitoba. The climate is characterized by short, warm summers and long, cold winters with a mean annual temperature about 2.4 C. The average growing season is 183 days and the growing degree days number about 1,720.

Mean annual precipitation is approximately 515 mm of which less than 25% falls as snow. Year to year precipitation varies greatly from highest in late spring through summer and the average yearly moisture deficit is about 200 mm. The ecodistrict also has a cool, subhumid to humid, Boreal to moderately cold, Cryoboreal soil climate.

Table 1 shows selected climate data for the City of Winnipeg collected from 1971 to 2000 from the station located at the Winnipeg Richardson International Airport. The mean annual temperature for the Winnipeg Richardson International Airport station is 2.6^{o}C. The mean annual precipitation is 513.4 mm with 415.6 mm occurring as rainfall.

Table 1
Selected Climate Data for the Winnipeg Richardson International Airport

Parameters	Year	June – Aug.	May – Sept.	July	Jan.
Temperature ^{0}C	2.6	18.3	15.8	19.5	-17.8
Precipitation mm (equiv.)	513.4	235.2	346.3	70.6	19.7
Rain/Snow (mm/cm)	415.6/110.6	235.2/0.0	345.1/1.2	70.6/0.0	0.2/23.1
Growing degree-days >5^{o}C	1806.3	1228.40	1675.40	450.50	0.0

3.1.3 Geology and Groundwater

The bedrock in the Project area is from the Ordovician period and belongs to the Gunn and Penitentiary Members of the Stony Mountain Formation (Manitoba Mineral Resources, 2013). Areas of bedrock geology in the project area are characterized as being calcareous shale, fossiliferous limestone and argillaceous dolomite (Manitoba Mineral Resources, 2013).

The surficial geology of the in the general area of the RM of Rosser is characterized as being glaciolacustrine sediments comprised of clay, silt and minor sand. These sediments range in thickness from 1 to 20 metres and are found in areas of low relief (Manitoba Mineral Resources, 2013).

Based on the results of the Phase II Environmental Assessment (Appendix B) the site consists of areas of gravel overlying granular fill material to a depth of approximately 0.46 metres below ground surface (mbgs) overlying native soil comprised of brown damp clay of moderate plasticity. This material is followed by brown moist silty clay and areas with no fill material transitioning into natural material consisting of brown damp clay of moderate plasticity and black damp organic clay of moderate plasticity.

Within the RM of Rosser, the formations that form the aquifers are parts of the long narrow sand and gravel deposits at or near surface and carbonate rock. (Rutulis, 1974). The carbonate aquifers found in RM of Rosser, are comprised of carbonate rock and the depth to the aquifer ranges from 10 to 90 feet (Rutulis, 1974).

Groundwater in most of the municipality is fair to good quality. In general the groundwater in the upper part of the carbonate aquifer within the project area is considered to be of good quality. Total dissolved solids concentrated is less than 1000 parts per million (ppm) and hardness less than 500 ppm. Groundwater levels at the site measured on September 16, 2014 varied between 0.61 mbgs and 0.91 mgbs.

Ground pollution hazard areas exists in the municipality area where the carbonate aquifers are at or near the ground surface (Rutulis, 1980). Potential groundwater pollution sources in these areas include: seepage from septic drain fields, leachates from waste disposal grounds and any toxic substance that is spilled.

3.1.4 Physiography and Surficial Drainage

The Winnipeg Ecodistrict lies in the central lowland of the Red River Plain and in general is characterized as a smooth, level to very gently sloping, clayey glaciolacustrine plain with an a mean eleveation of 236 masl. (Smith et al. 1998). The topography of the Site was characterized as being generally flat-lying. Meandering north through the centre of the plain to Lake Winnipeg, is the Red River. It is anticipated that overland storm water collected at the Site would flow into the adjacent drainage ditches surrounding the Site.

3.1.5 Soils

Soils in the Winnipeg Ecodistrict consist mainly of imperfectly drained Gleyed Humic Vertisols and Gleyed Vertic Black Chernozems, and poorly drained Gleysolic Humic Vertisols and Humic Gleysols which have been developed on calcareous, clayey glaciolacustrine sediments (Smith et al. 1998). According to the Phase II Environmental Site Assessment (Appendix B), soils at the Project Site are prominently comprised of fine-grained soils (clay and silt).

3.1.6 Surface Water Bodies

Currently there are no surface water bodies located within the Site. The closet surface water body to the site is Omands Creek which is located approximately 350 m southwest of the Site. The project site will not affect this surface water body.

3.1.7 Vegetation

During the Site visit completed as part of the Environmental Screening, the ground surface was predominantly gravel. Bulrushes, sedges and reeds were observed adjacent to the Site in drainage ditches. The majority of the areas surrounding the site are developed for industry with similar vegetation and ground cover found in drainage ditches.

The Manitoba Conservation Data Centre (MBCDC) maintains a list of plant species of conservation concern in the province. Appendix D, Table D1 lists flora of conservation concern in the Lake Manitoba Plain Ecoregion which encompasses the Site. Species listed by *The Endangered Species Act* of Manitoba (MBESA), *Species at Risk Act* (SARA) and the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) are also included in Appendix D, Table CD.

The potential for any species of concern to occur at the Site is low due to industrial use, graveled ground surface, and lack of vegetated areas.

3.1.8 Wildlife, Amphibians, Reptiles and Terrestrial Invertebrates

Mammals and birds that may be observed within industrial areas of Winnipeg include rodents and common bird species such as crows, robins and Canada geese. There is the potential for amphibians and reptiles to be present in neighbouring ditches and low lying areas adjacent to the site.

The Manitoba Conservation Data Centre (MBCDC) maintains a list of wildlife and invertebrate species of conservation concern in the province. Appendix D, Table D1 lists species of conservation concern in the Lake Manitoba Plain Ecoregion which encompasses the Site. Species listed by *The Endangered Species Act* of Manitoba (MBESA), *Species at Risk Act* (SARA) and the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) are also included in Appendix D, Table D2.

As a result of the proposed site being located in an existing industrial use area and currently developed, the potential to encounter wildlife, terrestrial invertebrates, amphibians and reptile species of concern in the project area is low. The proposed project will not impact the adjacent ditches and low-lying areas and therefore the effect to invertebrates, amphibians and reptiles potentially found in these areas is negligible.

There are no wildlife management areas or ecologically significant areas within 2 km of the proposed site.

3.1.9 Aquatic Species and Habitat

There are no major water bodies located at the proposed site. The nearest water body, Omands Creek, is located approximately 350 m southwest of the Site. The project site will not affect this surface water body or aquatic species within this water body.

3.2 SOCIOECONOMIC AND LAND USE ENVIRONMENT

3.2.1 Infrastructure and Commercial Properties

The proposed site is located in an area zoned for industrial general use (12) by the CentrePort Area Zoning By-Law 10-14, RM of Rosser. Existing infrastructure located adjacent to the proposed site includes the following:

- Oak Point Hwy is located to the north of the proposed site. Brookside Blvd. is immediately adjacent on the east side of the property, Lucas Ave is located immediately adjacent to the south and continues on the west side of the Site.
- Commercial properties located immediately north of the proposed site include Fleet Brake Auto Repair Shop), and Inland Audio Visual to the northwest of the Site.
- Two Canadian National (CN) rail lines are located 350 m to the south of the proposed project location.
- Residential properties are located approximately 450 m from the proposed site on the east side.
- R&D Trailer Rentals is located adjacent to the western Site boundary followed by a commercial building occupied by Thermo King of Mid Canada.
- The eastern site boundary is bordered by Brookside Blvd. and the following commercial properties: International Pallet, Tri-Core Projects Manitoba Ltd., Uni-Jet Industrial Pipe Service, Red River Siding and Eaves troughs, and Prairie Gear Manufacturing.
- The southern site boundary is bordered by Lucas Ave. followed by Murray Kozie Trucking Ltd. And Mack Sales and Services of Manitoba.

- Associated sewer, water and gas lines with the commercial and residential properties located adjacent to the site.

Of note in the RM of Rosser is CentrePort Canada, a Winnipeg-based inland port that will provide businesses with single-window access to free trade zone benefits, access to tri-modal transportation and a gateway to key markets in North America, Latin America, Asia and Europe. The development of CentrePort Canada will see the construction, over time, of some 3,642 ha of business parks, general industrial, aviation related industrial and distribution related facilities in the northwest area of Winnipeg and in the Rural Municipality of Rosser. The CentrePort Canada initiative includes development of a high-speed transportation corridor for the inland port. Currently more than 150 acres are in various stages of development or have been completed by 27 companies. In addition, the four lane divided highway which aims to better connect businesses within the inland port to national and international highways is more than 70% complete (Centreport Canada website, 2015).

3.2.2 Recreation

There are no federal, provincial or municipal parks located on or immediately adjacent to the proposed site. The closest municipal park is Omand's Creek Park located approximately one kilometre south east of the Site, while Little Mountain Park is located just over one kilometre to the northwest of the Site.

3.2.3 Historic Sites

Brookside Cemetery in the City of Winnipeg is located less than 2 km southeast of the Site. There are no other municipal, provincial or national designated sites within five kilometres of the proposed site (City of Winnipeg, 2010)

3.2.4 First Nations

There are no First Nations reserve lands or TLE's (Treaty Land Entitlement) selections located within 2.0 km of the proposed project site. The closest First Nations lands is Roseau River Anishinabe First Nation Reserve No. 2B located approximately 8.5 km northwest of the proposed site in SW-7-12-2EPM. It is approximately 75.4 ha (305,000m2) of land located at the junction of Hwy 6 and 236 and the Perimeter Highway on the east side of PTH 236.

3.2.5 Schools

There are no schools located on properties adjacent to the site. The closest school is Prairie Rose Elementary located approximately 800 m northeast of the proposed site.

3.2.6 Residential

The community of Tyndall Park, with approximately 2730 houses, is the closest residential area located approximately 450 metres east of the site.

4.0 DESCRIPTION OF POTENTIAL ENVIRONMENTAL EFFECTS AND MITIGATION MEASURES

The following outlines potential effects on the physical, biophysical and socio-economic environment that may occur from the operation of the proposed waste battery handling and transfer depot. Mitigation measures for any potential effects identified are also discussed.

4.1 Air Emissions

Air emissions that may result from the operation of the proposed waste battery handling and transfer depot include emissions that may be generated from the facility heating and cooling system and those generated by increased truck traffic transporting the waste batteries. Mitigation measures include:

- Ensuring the heating and cooling systems are properly maintained as well as inspected and serviced when not in proper working order.
- Ensuring transport vehicles for the waste batteries are in proper working condition

No other emissions will be generated by the proposed waste battery and handling depot.

4.2 Climate

The operation of the proposed waste battery handling and transport depot will have no effects on the climate or greenhouse gas emissions. Although there is the potential for a slight increase in traffic in the area, the number of trucks transporting the waste batteries will be minimal with respect to the amount of vehicles currently used for other reasons in the area (i.e. Centreport Canada Way transportation corridor, commercial, residential, retail, industrial). Air emissions (exhaust) produced from the trucks for the waste battery transfer station are considered negligible.

4.3 Noise Emissions

There is the potential for additional noise to be generated from the slight increase in truck traffic that will be generated as a result of the proposed waste battery facility, maintenance shop and crossdock.

Given the location of the facility in an industrial zoned area of the RM of Rosser and the distance to the nearest residential property of approximately 450 m, effects from noise emissions are considered negligible.

4.4 Hazardous and Non-Hazardous Waste

Based on the information provided by Direct LP, hazardous materials that will be stored as a result of the proposed operation of the waste battery handling and storage includes:

- small amounts of petroleum hydrocarbons (for forklift operation and maintenance) including gasoline, motor oil, hydraulic oil, lubricants and grease

- waste batteries (lead acid batteries)

There is the potential for spills to occur as a result of the storage and transfer of hazardous materials on site. Spills or leakage from machinery (i.e, forklifts) may also occur. The following mitigation measures will be followed to minimize potential effects from spills or leakage from any hazardous or non-hazardous waste generate, stored and transferred from the site:

- Forklifts and other machinery that may be used will be kept in good working condition. Regular inspections and maintenance of equipment will be conducted.
- All used oil on site will be stored in sealed containers until it is transported off site by EnviroWest.
- Absorb All will be used to clean up any minor spills that occur and EnviroWest will be contacted immediately to remove the Absorb All and spilled material
- All applicable regulations and conditions of the DGHT Licence will be adhered to for the collection, storage and transportation of the waste batteries
- Storage of Waste batteries will be for a limited time until transportation can be arranged
- Direct LPs Standard operating procedures for battery core handling, palletizing, and shipping as well as contingency plans and emergency response plans will be adhered to (see Appendix E for procedures and plans).
- Batteries will be palletized and shrink wrapped to reduce the potential for spills. All cracked and leaking batteries will be bagged in plastic and stacked on the top layer. Batteries will be stacked and stored as outlined in the procedures identified in Appendix E.

Non hazardous material that may be generated on site includes domestic garbage and recyclable material. Non-hazardous wastes, including domestic garbage and recyclables, will be separated and disposed of in commercial dumpsters and picked-up by a licensed commercial hauler.

4.5 Wildlife and Vegetation

As the proposed location for the waste battery storage and handling depot will be located in an existing industrial use area, and that the existing site is developed and the ground surface is predominantly gravel with no vegetation, there are no anticipated effects to any wildlife or vegetation species of conservation concern.

4.6 Aquatic Habitat and TIAR

As there are no water bodies located in the proposed project site, the project will have no effects on any aquatic species or aquatic habitats. There is the potential for amphibians and reptiles to be present in the adjacent drainage ditches to the site. As the development of the proposed waste

battery storage and handling warehouse will not affect the adjacent ditches, no effect to amphibians or reptiles are anticipated.

As a result of the ground surface consisting predominantly of gravel with no vegetation, potential effects to any terrestrial invertebrate species of concern is considered negligible.

4.7 Socio-Economic Effects

Socio-economic effects that are anticipated as a result of the project include increased traffic and economic benefits.

4.7.1 Increased Traffic

Increased traffic may result from the addition of transport trucks used for the delivery and hauling away of the waste batteries. It is anticipated that the number of additional vehicles/trucks will be minimal and therefore are negligible as a result of additional cars/truck would occur from residents or workers from other existing industries in the area.

4.7.2 Economic Benefits

The development of a waste storage and handling warehouse may have a positive effect by way of job creation and employment. Surrounding amenities such as restaurants can benefits from the additional employees that may be required for the waste battery storage and handling warehouse.

There are no parks (municipal, provincial or federal), First Nations, schools or heritage sites located on or adjacent to the property.

4.8 Health and Safety

There is the potential for workers on site to be affected if potential spills of hazardous materials stored on site occur. The following mitigation measures will be adhered to minimize potential effect:

- Procedures outlined in Appendix C (Direct LP Hazardous Waste Management Contingency Program – Batteries) and Appendix E (Storage of Waste Lead Acid Batteries), and Appendix F (Emergency Response Plan) will be adhered to by all workers involved with the storage, handling and transport of the waste batteries. Adherence to these procedures will negate potential health and safety effects that may result from spills or other contact with waste batteries.

- Employees will ensure they review and understand the Material Safety Data Sheets (MSDS) that will be posted at the site for all hazardous materials stored on site.

- Employees will review and adhere to the Fire Safety Plan outlined in Appendix G.

- Direct LP will ensure a sprinkler tie-in system in provided for the waste battery transfer station.

- The sprinkler system will be supplemented by standpipe fire hoses and fire extinguishers.

4.9 Residual Effects

There are no anticipated residual effects as a result of the proposed waste battery transfer station.

5.0 FOLLOW-UP PLANS

Direct LP will ensure that the Hazardous Waste Management Contingency Program – Batteries (Appendix C), Emergency Response Plans (Appendix F), and Fire Safety Plans Procedures outlined in Appendix G, are reviewed, understood and adhered to by all personnel working in the waste battery transfer station. In addition, Direct LP will adhere to the procedures outlined in Appendix E: How to properly stack used batteries on pallets" to properly store waste batteries.

As the project is not anticipated to cause any effects to the biophysical or socio-economic environments adjacent to the site, no follow-up plans or monitoring plans are required.

6.0 CONCLUSIONS

This environmental assessment has been prepared for Direct LP to support the application that will be completed in order to receive a licence for a facility to store and transfer waste batteries under the Dangerous Goods Handling and Transportation (DGHT) Act.

Direct LP proposes to relocate the current waste battery transfer site at 55 Rothwell Road to 490 Lucas Ave in the RM of Rosser in an area already designated for industrial use with existing facilities owned by Direct LP located on site. After review of the proposed site location (industrial general use) and adherence to the contingency plans (including emergency response, fire safety and storage of batteries) developed by Direct LP for the waste battery transfer station, it has been determined there will be no environmental effects as a result of the proposed project.

7.0 REFERENCES

City of Winnipeg. 2010. Heritage Conservation. Website accessed in July 2013. http://www.winnipeg.ca/ppd/historic/historic.stm

City of Winnipeg. 2015. City of Winnipeg Maps. Website accessed October 2015. http://winnipeg.ca/interhom/maps/default.stm

COSEWIC. 2011. Canadian Wildlife Species at Risk. Committee on the Status of Endangered Wildlife in Canada. Web site: http://www.cosewic.gc.ca/eng/sct0/rpt/rpt_csar_e.cfm [accessed 17 October 2011]

Government of Canada. Species at Risk Public Registry website accessed July 2013. http://www.sararegistry.gc.ca/species/schedules

Manitoba Conservation Data Centre. Occurrence of species by ecoregion. Website Accessed July 2013.http://www.gov.mb.ca/conservation/cdc/ecoreg/lakembplain.html

Manitoba Conservation Data Centre. Conservation Data Centre Ranks. Website Accessed July 2013. http://www.gov.mb.ca/conservation/cdc/consranks.html

Manitoba Conservation. Wildlife Branch. Species Listed Under the *Manitoba Endangered Species Act* website accessed July 2013. https://www.gov.mb.ca/conservation/wildlife/sar/sarlist.html

Manitoba Mineral Resources 2015: Bedrock geology, Manitoba; *in* Map Gallery – Geoscientific Maps, Manitoba Mineral Resources, URL http://web33.gov.mb.ca/mapgallery/mgg-gmm.html> [October 2015]

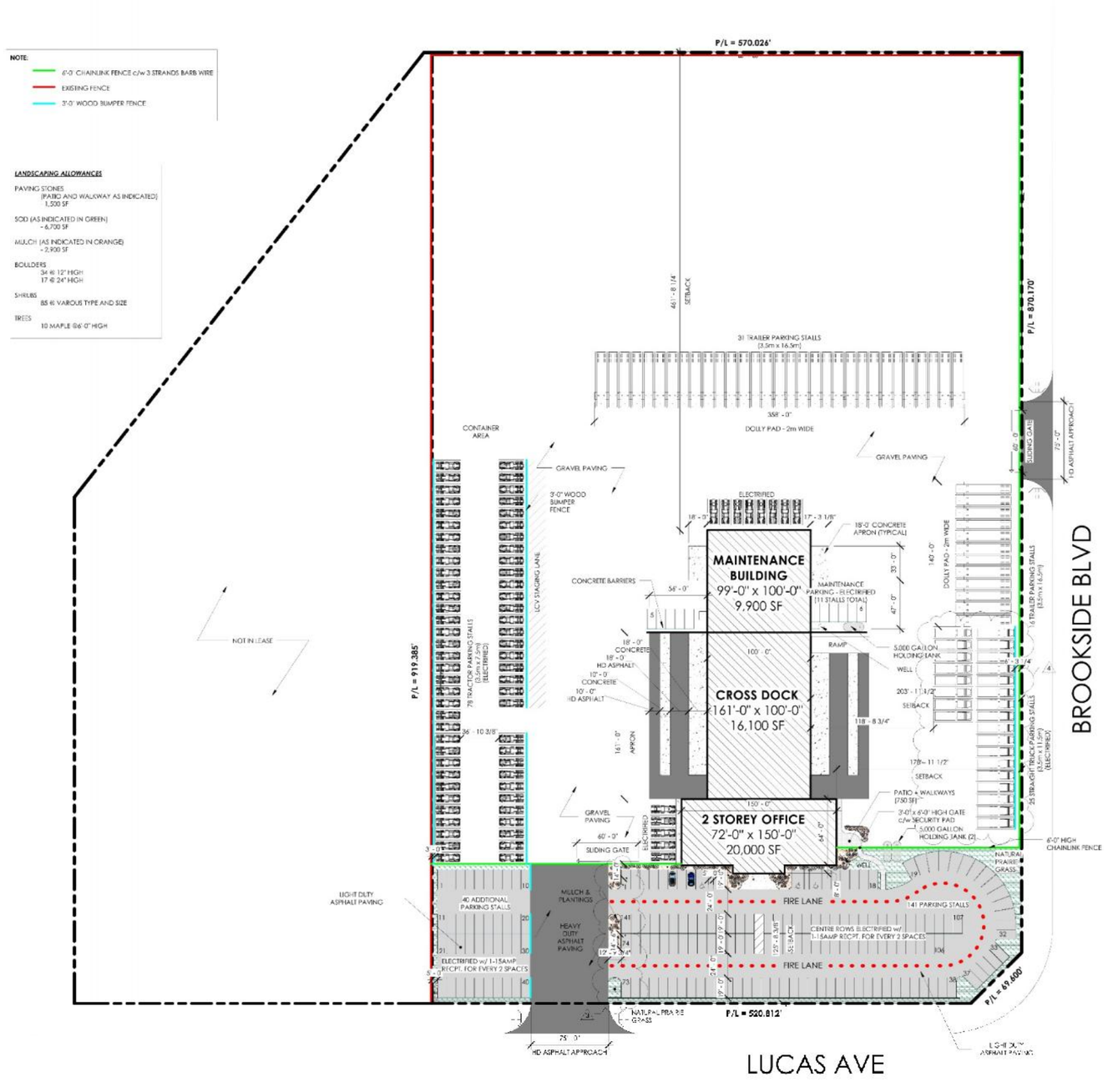
Rural Municipality of Rosser. 2011. CentrePort Zoning By-law 10-14. Website accessed October 2015. http://www.rmofrosser.com/main.asp?cat_ID=1&sub_ID=17

Rutulis, M. 1974. Groundwater Availability in the Municipality of Rosser. Inter-departmental memo. Province of Manitoba.

Smith, R.E., H. Veldhuis, G.F. Mills, R.G. Eilers, W.R. Fraser, and G.W. Lelyk. 1998. Terrestrial Ecozones, Ecoregions, and Ecodistricts, An Ecological Stratification of Manitoba's Landscapes. Technical Bulletin 98-9E. Land Resource Unit, Brandon Research Centre, Research Branch, Agriculture and Agri-Food Canada, Winnipeg, Manitoba. Report and Map at 1:1 500 000 scale. CD-ROM 2001

APPENDIX A

PROJECT SITE PLAN AND CERTIFICATE OF TITLE



A0.0 SITE PLAN 1" = 30'-0"

THOMAS DESIGN BUILDERS LTD.
2395-C McGillivray Blvd | Winnipeg, MB | R3Y 1G6 | (204) 989-5400
thomasdesignbuilders.ca

NO.	DESCRIPTION	DATE
1	ISSUED FOR TENDER	DEC., 5, 2013
2	ISSUED FOR CONSTRUCTION	SEPT 9, 2014
3	ADDITIONAL PARKING STALLS	APR 23, 2015
4	ADDITIONAL STRAIGHT TRUCK PARKING	APR 23, 2015

CANADA CARTAGE

CROSS DOCK FACILITY

480 LUCAS AVENUE
ROSSER, MB
R0H 1E0

SITE PLAN

PROJECT NUMBER	1314
DATE	SEPT 9, 2013
DRAWN BY	KW, JC
CHECKED BY	

A0.0

SCALE 1" = 30'-0"

STATUS OF TITLE

Title Number **2667478/1**
Title Status **Accepted**
Client File BJH

The Property Registry
A Service Provider for the Province of Manitoba

1. REGISTERED OWNERS, TENANCY AND LAND DESCRIPTION

ROTHWELL DEVELOPMENT CORPORATION

IS REGISTERED OWNER SUBJECT TO SUCH ENTRIES RECORDED HEREON, IN THE FOLLOWING DESCRIBED LAND:

LOT 2 PLAN 44449 WLTO
IN E 1/2 OF 22-11-2 EPM.

The land in this title is, unless the contrary is expressly declared, deemed to be subject to the reservations and restrictions set out in section 58 of *The Real Property Act.*

2. ACTIVE INSTRUMENTS

Instrument Type:	**Caveat**
Registration Number:	**3133130/1**
Instrument Status:	**Accepted**
Registration Date:	2005-05-19
From/By:	RURAL MUNICIPALITY OF ROSSER
To:	DOUGLAS WAYNE GRANTHAM AS AGENT
Amount:	
Notes:	No notes
Description:	DEVELOPMENT AGREEMENT

Instrument Type:	**Caveat**
Registration Number:	**3275078/1**
Instrument Status:	**Accepted**
Registration Date:	2006-04-12
From/By:	CENTRA GAS MANITOBA INC.
To:	
Amount:	
Notes:	AFF: WTN LTS R/W PL 44936
Description:	EASEMENT

Instrument Type:	**Caveat**
Registration Number:	**3275083/1**
Instrument Status:	**Accepted**
Registration Date:	2006-04-12
From/By:	MANITOBA HYDRO, MTS ALLSTREAM INC. & SHAW CABLESYSTEMS
To:	
Amount:	
Notes:	AFF: WTN LTS R/W PL 44936
Description:	EASEMENT

Instrument Type:	**Mortgage**
Registration Number:	**4541827/1**
Instrument Status:	**Accepted**
Registration Date:	2014-10-20
From/By:	ROTHWELL DEVELOPMENT CORPORATION
To:	BUSINESS DEVELOPMENT BANK OF CANADA
Amount:	$7,300,000.00
Notes:	No notes
Description:	No description

Instrument Type:	**Personal Property Security Notice**
Registration Number:	**4541828/1**
Instrument Status:	**Accepted**
Registration Date:	2014-10-20
From/By:	BUSINESS DEVELOPMENT BANK OF CANADA
To:	TIMOTHY A. KURBIS AS AGENT
Amount:	
Notes:	No notes
Description:	EXPIRES AUGUST 1, 2044

3. ADDRESSES FOR SERVICE

ROTHWELL DEVELOPMENT CORP.
25 ROTHWELL ROAD
WINNIPEG, MB.
R3P 2M5

4. TITLE NOTES

PLAN APPLICATION 4172-2015-7430

5. LAND TITLES DISTRICT

Winnipeg

6. DUPLICATE TITLE INFORMATION

Duplicate not produced

7. FROM TITLE NUMBERS

2123988/1 All

8. REAL PROPERTY APPLICATION / CROWN GRANT NUMBERS

No real property application or grant information

9. ORIGINATING INSTRUMENTS

Instrument Type:	**Request To Issue Title**
Registration Number:	**4365797/1**
Registration Date:	2013-06-14
From/By:	ROTHWELL DEVELOPMENT CORPORATION
To:	BY AGENT: RONALD S. ADE
Amount:	

10. LAND INDEX

Lot 2 Plan 44449

CERTIFIED TRUE EXTRACT PRODUCED FROM THE LAND TITLES DATA STORAGE SYSTEM OF TITLE NUMBER 2667478/1

APPENDIX B

PHASE II ENVIRONMENTAL SITE ASSESSMENT

APPENDIX C

CONTINGENCY PLAN

Direct General Partner Corporation Hazardous Waste Management Program - Batteries

Table of Contents

Preface

Direct General Partner Corporation is engaged in the transportation and storage of new and used lead/acid batteries. This contingency plan will outline our response to emergencies involving the accidental release of any component of the hazardous waste involved in this transportation and storage of the used batteries.

This Contingency plan will identify potential hazards and provide appropriate mechanisms for minimizing risk, loss and damage resulting from such incidents (*i.e.* reduce exposures to communities), and provide an incident management structure to guide response activities.

I Introduction

1.0 Purpose and Scope

The primary purpose of this document is to outline the Hazardous Waste Emergency contingency plans specific to the transportation and storage of lead/acid used batteries.

Provincial legislation pertaining to our response planning includes the *Dangerous Goods Handling and Transportation Act* and regulations hereunder.

This contingency plan is based on the MB Guidelines for Manitoba Conservation Emergency Response Program.

2.0 Definitions

Accident means an unexpected event which results in loss or injury to a person and/or damage to property or the environment.

Contingency Plan means a detailed program of action to control and/or minimize the effects of an "emergency requiring prompt corrective measures" beyond normal procedures to protect human life, minimize injury, to optimize loss control, and to reduce the exposure of physical assets and the environment from an accident.

Emergency means, in the context of these guidelines, an accidental situation involving the release or imminent release of hazardous waste that could result in serious adverse effects on the health and/or safety of persons or the environment.

Electrolyte solution means, in the context of these guidelines, a mixture of water and sulphuric acid contained within used lead acid batteries.

Hazard means an event with a potential for human injury, damage to property, damage to the environment, or some combination thereof

Hazardous Waste has the prescribed meaning from Section 1 of the "The Dangerous Goods Handling and Transportation Act"

Incident Response System means a method by which the response to an extraordinary event, including a spill, is categorized into functional components and responsibility for each component is assigned to the appropriate individual or agency.

Risk means the chance of a specific undesired event occurring within a specified period or in specified circumstances. It may be either a frequency or a probability of a specific undesired event taking place.

Risk Analysis means the identification of undesired events that lead to the materialization of a hazard, the analysis of the mechanisms by which these undesired events could occur and, usually, the estimation of the extent, magnitude, and likelihood of any harmful effects.

Risk Assessment means the quantitative evaluation of the likelihood of undesired events and the likelihood of harm or damage being caused by them, together with the value judgments made concerning the significance of the results.

Risk Frequency means the number of occurrences per unit of time.

Risk Management means the program that embraces all administrative and operational programs that are designed to reduce the risk of emergencies involving acutely hazardous materials. Such programs include, but are not limited to, ensuring the design safety of new and existing equipment, standard operating procedures, preventive maintenance, operator training, accident investigation procedures, risk assessment for unit operations, emergency planning, and internal and external procedures to ensure that these programs are being executed as planned.

Spill means a release or discharge into the environment, not authorized under the Act, of a substance in an amount equal to or greater than the amount listed in Column 2 of the Schedule opposite that substance in Column 1.

1.0 Policy Statement Regarding Hazardous Waste

January 2, 2009

As one of Canada's leading transportation companies, Direct General Partner Corporation is committed to protecting the health of our employees and the global environment. We are committed to safeguarding the environment and minimizing or reducing adverse environmental impacts of our operations across Canada and the United States.

We will achieve environmental excellence by our commitment to:

- **Meet** all regulatory requirements regarding transportation and storage of Hazardous Waste and, where possible, go beyond to achieve our corporate target of zero incidents.
- **Demonstrate** responsible leadership in the event of any spill by prioritizing the safety of our employees, the public and the environment and by integrating environmental, economic and social considerations into each of our operations.
- **Offer** a clear line of communication regarding environmental spills. Public and media inquiries will be directed to our corporate head office in Mississauga, ON and will be dealt with by members of the executive team.
- **Respond** to incidents by empowering our front line supervisors to activate our National Incident Response protocols under the direction of Ted Pomeroy, National Director of Risk Management.
- **Promote** awareness and protection of the environment through an appropriate management system that identifies, prioritizes and addresses environmental issues.
- **Review** yearly, effective April 1, 2009, our programs, strategies, objectives and targets and monitor environmental spill programs to ensure compliance with our policies and continuous improvement.
- **Hold** management accountable for providing leadership on environmental matters, for achieving specific targets and objectives, and providing training and resources.
- **Ensure** employees are trained in spill response and records of training are maintained in regards to the Direct Transport environmental emergency policies and procedures.

James Rudyk

Chief Operating Officer

2.0 Purpose and Scope

The purpose of this contingency plan is to develop a state of readiness which will allow for a prompt and orderly response to an emergency involving a load of used batteries containing an electrolyte solution.

- Lead acid batteries contain an electrolyte solution of water and sulfuric acid.
- Sulfuric acid is very toxic.
- Lead and its compounds can pose a severe threat to the environment. Contamination of water, soil and air should be prevented. In most surface water and groundwater, lead forms compounds with anions such as hydroxides, carbonates, sulfates and phosphates. Lead can be carried in colloidal particles in surface water. It may be immobilized by chelation with humic or fulvic acids in the soil. Lead is bio-accumulated by plants and animals, both aquatic and terrestrial.
- Under our National Risk management structure, spill response initiated by any front-line supervisor or driver will be coordinated using the procedures laid out in the emergency response binder.
- Spill notification procedures are regulated under Federal laws under the Transportation of Dangerous Goods Act. Any spill of sulfuric acid or waste sulfuric acid greater than 5kg or 5 L must be reported to the Provincial authorities listed
- The National Director of Risk Management will have the overall responsibility for Incident Management

Prevention is by far the most effective way of reducing or eliminating the potential for an accident and spill, as well as impact mitigation to reduce community and environmental impacts should a spill occur.

3.0 Pre-Emergency Planning

3.1 Hazard Identification

- Lead acid batteries contain an electrolyte solution containing sulfuric acid.Sulfuric acid is a clear, colourless to dark brown, odourless, dense, oily liquid. It will not burn but it can decompose at high temperatures forming toxic gases, such as sulfur oxides. Contact of sulfuric acid with combustible materials may cause fire. It is considered to be highly reactive. Contact with many organic and inorganic chemicals may cause fire or explosion and contact with metals liberates flammable hydrogen gas. It also reacts violently with water.
- Sulfuric acid is very toxic. It may be fatal if inhaled or swallowed and it is corrosive to the eyes, skin and respiratory tract. It may cause blindness and permanent scarring. It also causes lung injury and these effects may be delayed. Strong inorganic acid mists containing sulfuric acid are carcinogenic. Sulfuric acid is corrosive and will cause burns to the mouth, throat, esophagus and stomach if ingested. Symptoms may include difficulty swallowing, intense thirst, nausea, vomiting, diarrhea, and in severe cases, collapse and death. Small amounts of acid which may enter the lungs during ingestion or vomiting (aspiration) can cause serious lung injury and death.
- Lead itself can cause local irritation if it contacts skin or eyes. Inhalation or ingestion of lead dust or fumes may result in headache, nausea, fatigue, sleep disturbances, anemia and joint pain. Prolonged exposure can cause central nervous system damage, gastrointestinal disorders, metallic taste, kidney dysfunction and reproductive disturbances.
- **Ecotoxity**: Ecotoxicity in water (LC50) 49 mg/l 48 hours **Products of Biodegradation:** Possibly hazardous short term degradation products are not likely. However, long term degradation products may develop. **Toxicity of the Products of Degradation:** The products of degradation are less toxic than the product itself.

3.2 Risk Analysis

- Spill potential in the event of a catastrophic accident or in the event of a load collapse within the trailer during transport is limited to small amounts of acid contained in used batteries.
- Limited quantities of acid could possibly be released during such events. Quantities under 100L would be most likely in a worst case scenario.
- Such events would require clean up by experienced, trained personnel with appropriate personal protection equipment.

To reduce or eliminate risk, spill exposure can be mitigated by using proper loading and load securement techniques For this purpose, drivers and supervisors are encouraged to provide information concerning weaknesses in transport loading or operating procedures, "near misses," and potential problems they have observed, along with recommended measures for prevention/mitigation of such occurrences. Approved containment devices will be used to enclose any batteries that have exposed cracks, or leaks.

3.3 Legislation and Industry Standards

Direct Transport's Contingency Plan recognizes our responsibilities under the following federal, provincial and local regulations:

- The Dangerous Goods Handling and Transportation Act
- Classification Criteria for Products, Substances and Organisms Regulation
- Dangerous Goods Handling and Transportation Regulation
- Generator Registration and Carrier Licensing Regulation
- Manifest Regulation

- All spills over 5L must be reported to the Provincial Emergency Program (PEP) by calling 1-800-663-3456
- The report should include the shipping name and UN number, the quantities involved, the location of the event, the condition of the means of containment.
- The person in possession, charge or control of the spilled substance will take all reasonable and practical action to stop, contain and minimize the effects of the spill

3.4 Emergency Organization and Responsibilities

In the event of a spill involving the hazardous waste contained within a shipment of lead acid batteries, the response escalation and cleanup will become the primary task of all those involved.

- The person in possession, charge or control of the spilled substance will take all reasonable and practical action to stop, contain and minimize the effects of the spill
- The driver or warehouse worker involved in the spill will report the spill immediately to his supervisor or dispatch location.
- The supervisor/dispatcher will gather the required information regarding the event and contact 911 if required, call Risk Management and provide details of the event.
- Risk Management will assume control of the response when the cleanup is beyond the scope of local personnel.

3.5 Resources

Resources that will be utilized to assist in the incident include:

- Warehouse spill kits, Truck spill kits
- Personnel will include drivers, warehouse personnel and supervisors trained in the handling of lead acid batteries and spill response.
- Hazmat Spill response companies and towing services.

Direct LP will work with the appropriate federal and provincial governments to ascertain what resources (equipment, personnel, technology, and expertise) can be provided by the federal and provincial government, and under what conditions.

The following contact information and locations will be immediately available to all dispatchers and front line supervisors in all dispatch locations:

- fire departments
- police
- municipal and provincial agencies
- hospitals

3.6 Internal Alerting

In an emergency, information must be communicated quickly and accurately throughout the organization. The purpose of this portion of the plan is to communicate our emergency communication network and the procedure for the prompt notification of individuals and agencies involved in an emergency response.

In the event of an emergency involving a load of lead acid batteries the Emergency Response procedures listed in the Emergency Response binder will apply. The following are the 24 Hour contact numbers:

Risk Management 24 Hour Response: Phone: 204-479-7040

Gordon Russell 24 Hour : Phone 416-571-7251

Central Dispatch: Phone: 1-800-268-2228

3.7 External Alerting

The Emergency Response procedures laid out in the Emergency Response binders include the communication procedures to be followed in emergency situations.

- Emergency Contact Numbers
- Manitoba Insurance Adjusters
- Environmental Contact Numbers – 24 Hour Spill Response and Reporting

3.8 Electronic Communications

During an emergency, effective and reliable electronic communications equipment and procedures are vital. Direct Transport utilizes Blackberry cellular devices with pin-to-pin features to ensure consistent communication capabilities.

Direct dispatch communication centres are all equipped with multiple inbound/outbound land lines with the capacity to handle any foreseeable emergency situation.

3.9 Public Affairs

A good public relations program is extremely important in an emergency situation. Inquiries received from the media, government agencies, local organizations and the general public will be redirected to one of the following:

Ted Pomeroy- National Director of Risk Management.

Gordon Russell – National Director of Safety and Compliance

James Rudyk- Chief Operating Officer

Initial releases should be restricted to statements of facts such as the name of the Carrier involved, type and quantity of spill, time of spill, and countermeasure actions being taken. All facts must be stated clearly and consistently to everyone. Discrepancies will raise unnecessary concerns and speculation. To avoid mixed messages, the Ministry of Environment's preferred way of issuance of media releases is through a Joint Information Centre (JIC) that is separate from the Incident Command Post and that is staffed by Information Officers by both industry and government. Joint media releases are approved under Unified Command.

4.0 Emergency Response

4.1 Response Action Decision

We will use the following emergency coding to define the severity and potential impact of an emergency. The three levels of emergencies will be identified as follows:

1. LEVEL I: minor spills requiring an on-site driver to respond and take necessary actions.
2. LEVEL II: intermediate level spills requiring response by on-site driver or off-site trained staff but posing no danger to the public.
3. LEVEL III: a major incident beyond the resources of the company, where there are subsidiary problems to complicate the situation such as fire, explosion, other toxic compounds, and threat to life, property and the environment. Assistance will be required from local, regional, and/or provincial organizations. The media will be present and politicians at all levels will be requesting action.

Incident detection, information gathering and action decisions are the first steps in responding to an emergency incident. All these steps may occur over a short or protracted time period depending on the circumstances and magnitude of the incident. It is the responsibility of the personnel having on-scene access to evaluate the situation, assess the magnitude of the problem and activate the contingency plan.

When there are releases to the environment in a quantity equal to or greater than the amount listed in the Schedule in the Environmental Accident Reporting Regulation, the requirements of this regulation must be followed.

4.2 Plan Activation and Response Mobilization

Upon receiving initial notification of an incident involving release of hazardous waste into the environment, the individual having on-scene access will assess the magnitude of the problem and potential threat to personnel, equipment, and environment. If the situation warrants, the front line supervisor will invoke the contingency plan, and as soon as possible notify emergency response agencies such as the PEP, nearest fire hall and police post, etc. Situations must be assessed on an on-going basis to develop an appropriate response strategy.

The person who was in control of a substance just before it was spilled must immediately report the spill to the Provincial Emergency Program (PEP) when the amount of spilled substance is equal to or greater than the quantity specified in the Spill Reporting Regulation for the substance. Where it appears to a person observing the spill that the report to PEP has not been made, the person must report the spill.

The emergency response protocols for accident and spill response are laid out clearly in the Emergency Response binders located in each dispatch location.

For each emergency, the Emergency Action Checklist will be utilized to determine the appropriate course of action. The action items will include the following:

- identify the nature of the emergency and ascertain if there are casualties.
- locate the source of the spill, the area of immediate risk and the potential for escalation.
- mobilize the appropriate resources to isolate the hazard as far as possible and to implement "first aid" remedial actions. This will include the spill kits located on each truck and in each facility.
- initiate procedures for the protection of personnel, property and the environment. Spill kits will be used to contain the spill where possible.
- activate emergency communications links. Notify senior personnel, the appropriate agencies and neighbors where appropriate.
- liaise with officers of the emergency services and with other senior personnel as they arrive on-site, and cooperate as required.
- call for further emergency assistance as may be necessary.
- keep abreast of developments and ensure that the means of giving and receiving information, advice and assistance are functioning effectively, including that related to public relations.
- as appropriate, implement approved procedures for rehabilitation.

4.3 Response Action/Containment/Cleanup

Spill kits will be located on each truck involved in the transportation of the batteries and at all locations involved in the storage of the batteries. Personnel will be trained in the use of the spill kits as both containment and recovery equipment. In the case of small spills the 40L truck kit will be sufficient for containment and cleanup.

Spills beyond the scope of the on site equipment will be handled by approved spill response and hazardous waste removal companies. Vendors must be Ministry of the Environment licensed/approved for the disposal of such wastes.

4.4 Emergency Operations Centre - Incident Command Post

During emergencies, response operations will be directed by Ted Pomeroy in Winnipeg. The Incident Command Post will be responsible for directing and controlling the cleanup operations.

4.5 Evacuation

In the unlikely event of a catastrophic incident that would require an emergency evacuation of the surrounding community if there is any, most MB communities have their own emergency plans and therefore we would simply have to connect with the community authorities.

4.6 Disposal of Spilled Contaminants and Debris

Removal and Disposal of recovered spilled material and contaminated soil or absorbents will be done in conjunction with approved spill response and hazardous waste removal companies. Vendors must be Ministry of the Environment licensed/approved for the disposal of such wastes.

Legislation and regulations will be followed in waste disposal.

4.7 Site Restoration/Remediation

Direct LP will restore the affected environment to the pre-spill conditions. The required degree of restoration will usually be determined through consultation between the party responsible for the spill and the government regulatory agency with primary responsibility in that situation. Generally, this restoration will be accomplished through third party suppliers.

Restoration can include physical removal of contaminated surface materials, high-pressure washing, chemical cleaning, replacing of contaminated beach materials, restocking of lakes, and bioremediation.

All applicable legislation and regulations must be complied with in the site restoration/remediation.

4.8 Post-Incident Evaluation

A post-incident evaluation will be done on both mock exercises and actual emergency incidents to identify from the spill response operation the weaknesses or strengths in the Action Plan and to make appropriate corrections to the plan. Other uses for post-incident evaluation include accounting, legal, and public relations matters.

The post-incident evaluation will include the following:

- adequacy of training, contingency manual, control centre, communication plans, security, spill containment and recovery procedures, monitoring, etc.
- appropriateness of the emergency response action plan, media communications plan, mutual aid plans, etc.

Direct Transport personnel will prepare a written report on each incident. The report will include:

- a general description of the incident
- source and cause of the incident
- description of the response effort
- quantity of the spill and percent recovered
- itemized cleanup costs
- recommendations for preventative and mitigative measures
- plans for upgrading emergency preparedness and contingency plans

5.0 Training and Practice Drills

5.1 Training

Competency in responding to emergency incidents requires a complete understanding of the roles and duties of each person responsible on the team. Training of all drivers and front line supervisors on the hazards associated with the transportation and storage of lead acid batteries containing a sulphuric acid electrolyte solution will be provide prior to exposure to the risk. Training on the procedures in the Emergency Response binder will be provided to all front line supervisors and dispatchers.

This section of the plan should provide details of training programs for the company personnel and mutual aid agencies involved in responding to an emergency. The amount, type and frequency of training for each member of the team should be clearly spelled out.

Training will be provided at least annually and in the following situations:

- for new employees during their orientation period
- for existing employees when there is a change in their duties
- for existing employees when there are changes to operations
- when new equipment or materials are introduced
- when emergency procedures are revised
- when a drill indicates need for improvement

5.2 Practice Drills

Practice drills may be necessary to confirm the adequacy of the contingency plan. Generally, the emergency response protocols are utilized throughout the company on a regular basis during the normal course of business. In the unlikely event that the system is not utilized, a mock disaster shall be scheduled annually to confirm and evaluate the response. We will confirm the following:

- practicality of the plan (structure and organization)
- adequacy of communications and interactions among parties
- emergency equipment effectiveness (spill kits)
- adequacy of first aid and rescue procedures
- adequacy of emergency personnel response and training
- public relations skills

Drills may be conducted in various forms such as desktop, on-site or computer-synthesized. The complexity of the drill may be increased as the response team gains proficiency. Drills should be conducted in a variety of situations Roll-over, trailer fire). It is also desirable to include mutual aid organizations and public emergency response organizations in these drills.

6.0 Plan Evaluation

Annual evaluation of the contingency plan for hazardous waste spills and the emergency response protocols will be the responsibility of Ted Pomeroy and Gordon Russell. Any incidents will be reviewed as part of the evaluation.

7.0 Plan Updates

Plan updates will be the responsibility of Risk Management. When an amendment is made to the plan, the amendment date will be noted on the updated page of the plan. Ted Pomeroy will ensure that all plan-holders are notified of changes as soon as possible. Plan-holders will be requested to verify that they have received the changes.

Plan holders will be notified immediately of any key changes regardless of review period.

8.0 Appendices and Operational Guidelines

In an emergency situation it is extremely important that response personnel have immediate access to vital information. For this purpose some of the information may be organized in easy-to-follow tables in the appendices.

The following information will be included in the appendices:

- emergency response manual which includes:

- response team and key company personnel call out list
- provincial, federal and local government agencies
- organization, roles and responsibilities
- emergency incident report forms
- cleanup contractors

- material safety data sheets for materials to be transported
- emergency response manual distribution list

APPENDIX D

SPECIES OF CONSERVATION CONCERN

Table D1: Species of Conservation Concern in the Lake Manitoba Plain Ecoregion.

Animal Assemblage			
Gull Colony		GNR	SNR
Snake Hibernaculum		GNR	SNR
Tern Colony		GNR	SNR
Invertebrate Animal			
Hesperia dacotae	Dakota Skipper	G2	S2
Ligumia recta	Black Sandshell	G5	SNR
Orconectes immunis	Calico Crayfish	G5	SNR
Quadrula quadrula	Mapleleaf Mussel	G5	S2
Strophitus undulatus	Creeper	G5	SNR
Stylurus amnicola		G4	SNR
Terrestrial Community - Other Classification			
Andropogon gerardii-sporobolus heterolepis-andropogon scoparius herbaceous vegetation	Big Bluestem-prairie Dropseed-little Bluestem Herbaceous Vegetation	GNR	S1
Fraxinus pennsylvanica-(ulmus americana)-acer negundo forest	Green Ash-(American Elm)-manitoba Maple Forest	GNR	S3
Fraxinus pennsylvanica-ulmus americana-(celtis occidentalis, tilia americana) forest	Green Ash-american Elm-(Hackberry, Basswood) Forest	GNR	S2
Phragmites australis herbaceous vegetation	Common Reed Herbaceous Vegetation	GNR	S3?
Populus tremuloides/corylus americana-(symphoricarpos occidentalis) forest	Trembling Aspen/american Hazel-(Snowberry) Forest	GNR	S4
Populus tremuloides-quercus macrocarpa/aralia nudicaulis forest	Trembling Aspen-bur Oak/sarsaparilla Forest	GNR	S3S4
Quercus macrocarpa/amelanchier alnifolia/aralia nudicaulis-carex assiniboinensis forest	Bur Oak/saskatoon Serviceberry/sarsaparilla-assiniboia Sedge Forest	GNR	S3?
Salix exigua shrubland	Sandbar Willow Shrubland	GNR	S3S4
Scolochloa festucacea herbaceous vegetation	Sprangletop Herbaceous Vegetation	GNR	S3S4
Typha spp. herbaceous vegetation	Cattail Herbaceous Vegetation	GNR	S5
Vascular Plant			
Agalinis aspera	Rough Purple False-foxglove	G5	S1S2
Agalinis gattingeri	Gattinger's Agalinis	G4	S1
Agalinis tenuifolia	Narrow-leaved Gerardia	G5	S2S3
Agrimonia gryposepala	Common Agrimony	G5	S1S2
Alisma gramineum	Narrow-leaved Water-plantain	G5	S1
Ambrosia acanthicarpa	Sandbur	G5	S1S2
Amorpha fruticosa	False Indigo	G5	S1S2
Antennaria plantaginifolia	Plantain-leaved Everlasting	G5	S1S2
Arisaema triphyllum ssp. triphyllum	Jack-in-the-pulpit	G5T5	S2
Asclepias verticillata	Whorled Milkweed	G5	S2
Astragalus neglectus	Milkvetch	G4	S1
Atriplex argentea	Saltbrush	G5	S2
Boltonia asteroides var. recognita	White Boltonia	G5T3T5	S2S3
Botrychium pallidum	Pale Moonwort	G3	SH
Bouteloua curtipendula	Side-oats Grama	G5	S2
Bromus porteri	Porter's Chess	G5	S3?
Bromus pubescens	Canada Brome Grass	G5	SNA
Calamagrostis montanensis	Plains Reed Grass	G5	S3

Cardamine bulbosa	Spring Cress	G5	SH
Carex albicans var. albicans	Bellow-beaked Sedge	G5T4T5	SNA
Carex crawei	Crawe's Sedge	G5	S3S4
Carex cristatella	Crested Sedge	G5	S2
Carex douglasii	Douglas Sedge	G5	S3?
Carex emoryi	Emory's Sedge	G5	S2?
Carex hallii	Hall's Sedge	G4?Q	S3
Carex hystericina	Porcupine Sedge	G5	S3?
Carex livida	Livid Sedge	G5	S3
Carex parryana	Stalked Sedge	G5	S3?
Carex pedunculata	Parry's Sedge	G4	S3?
Carex projecta	Necklace Sedge	G5	S2?
Carex supina var. spaniocarpa	Weak Sedge	G5T3T5	S2?
Carex tetanica	Rigid Sedge	G4G5	S2
Carex tribuloides	Prickly Sedge	G5	SNA
Carex vulpinoidea	Fox Sedge	G5	S3?
Celtis occidentalis	Hackberry	G5	S1
Chamaesyce geyeri	Prostrate Spurge	G5	S1
Circaea lutetiana ssp. canadensis	Large Enchanter's-nightshade	G5T5	S2
Cirsium discolor	Field Thistle	G5	S1
Clematis ligusticifolia	Western Virgin's-bower	G5	S1
Clematis virginiana	Virgin's-bower	G5	S2
Corispermum americanum var. americanum	American Bugseed	G5?T5?	S2S3
Corispermum villosum	Hairy Bugseed	G4?	S1S2
Cornus alternifolia	Alternate-leaved Dogwood	G5	S3
Cuscuta pentagona var. pentagona	Dodder	G5T5	SU
Cyperus erythrorhizos	Red-root Flatsedge	G5	S1
Cyperus houghtonii	Houghton's Umbrella-sedge	G4?	S2
Cyperus schweinitzii	Schweinitz's Flatsedge	G5	S2
Cypripedium candidum	Small White Lady's-slipper	G4	S1
Dalea villosa var. villosa	Silky Prairie-clover	G5T5	S2
Desmodium canadense	Beggar's-lice	G5	S2
Dichanthelium linearifolium	White-haired Panic-grass	GNR	S2
Draba reptans	Creeping Whitlow-grass	G5	SU
Elatine americana	mud-purslane	G4	S1
Elodea nuttallii	Waterweed	G5	S1
Elymus diversiglumis	Various-glumed Wild Rye	G3G4Q	S2?
Elymus hystrix	Bottle-brush Grass	G5	S2
Eragrostis hypnoides	Creeping Teal Love Grass	G5	S4
Festuca hallii	Plains Rough Fescue	G4	S3
Festuca subverticillata	Nodding Fescue	G5	S1
Fraxinus nigra	Black Ash	G5	S3
Galium aparine	Cleavers	G5	SU
Gentiana puberulenta	Downy Gentian	G4G5	S2
Helianthus pauciflorus ssp. pauciflorus	Stiff Sunflower	G5T5?	SU
Heteranthera dubia	Water Star-grass	G5	S2
Hudsonia tomentosa	False Heather	G5	S3

Hypoxis hirsuta	Yellow Stargrass	G5	S3
Krigia biflora	Cynthia	G5	S2
Lactuca floridana	Woodland Lettuce	G5	SH
Lechea intermedia	Pinweed	G5	S1
Leersia oryzoides	Rice Cutgrass	G5	S3?
Leucophysalis grandiflora	Large White-flowered Ground-cherry	G4?	S3
Linum sulcatum	Grooved Yellow Flax	G5	S3
Lotus unifoliolatus	prarie trefoil	G5	S2S3
Lysimachia quadriflora	Whorled Loosestrife	G5?	S2
Menispermum canadense	Moonseed	G5	S3
Nassella viridula	Green Needle Grass	G5	S3
Oenothera perennis	Sundrops	G5	S1S2
Orobanche ludoviciana	Louisiana Broom-rape	G5	S2
Orobanche uniflora		G5	SU
Osmorhiza claytonii	Wooly or Hairy Sweet Cicely	G5	S2
Osmorhiza depauperata	Blunt-fruited Sweet Cicely	G5	S2
Parietaria pensylvanica	American Pellitory	G5	S4
Pellaea glabella ssp. occidentalis	Cliff-brake	G5T4	S2
Penthorum sedoides	Ditch-stonecrop	G5	S1S2
Phryma leptostachya	Lopseed	G5	S3
Platanthera orbiculata	Round-leaved Bog Orchid	G5	S3
Polygala verticillata	Whorled Milkwort	G5	S2
Polygala verticillata var. isocycla	Whorled Milkwort	G5T5	S2
Ranunculus cymbalaria var. saximontanus	Seaside Crowfoot	G5T5	S1S2
Sanguinaria canadensis	Blood-root	G5	S2
Shinnersoseris rostrata	Annual Skeletonweed	G5?	S1S2
Sisyrinchium campestre	White-eyed Grass	G5	SU
Solidago riddellii	Riddell's Goldenrod	G5	S2
Sporobolus compositus	tall dropseed	G5	
Sporobolus neglectus	Annual Dropseed	G5	S3?
Symphyotrichum sericeum	Western Silvery Aster	G5	S2S3
Townsendia exscapa	Silky Townsend-daisy	G5	S2
Verbena bracteata	Bracted Vervain	G5	S3
Vernonia fasciculata ssp. corymbosa	Western Ironweed	G5T3T5	S1
Veronicastrum virginicum	Culver's-root	G4	S1
Viola conspersa	Dog Violet	G5	S3?
Vertebrate Animal			
Accipiter cooperii	Cooper's Hawk	G5	S4S5B
Aechmophorus occidentalis	Western Grebe	G5	S4B
Ammodramus bairdii	Baird's Sparrow	G4	S1S2B
Ammodramus savannarum	Grasshopper Sparrow	G5	S2B
Anthus spragueii	Sprague's Pipit	G4	S2B
Ardea herodias	Great Blue Heron	G5	S4S5B
Athene cunicularia	Burrowing Owl	G4	S1B
Calcarius ornatus	Chestnut-collared Longspur	G5	S1S2B
Caprimulgus vociferus	Whip-poor-will	G5	S3B
Cardinalis cardinalis	Northern Cardinal	G5	S1B

Chaetura pelagica	Chimney Swift	G5	S2B
Chordeiles minor	Piping Plover	G3	S1B
Chelydra serpentina serpentina	Common Snapping Turtle	G5T5	S3
Charadrius melodus	Common Nighthawk	G5	S3B
Coturnicops noveboracensis	Yellow Rail	G4	S3S4B
Dolichonyx oryzivorus	Bobolink	G5	S4B
Falco peregrinus anatum	Peregrine Falcon	G4T4	S1B
Geomys bursarius	Plains Pocket Gopher	G5	S3
Hirundo rustica	Barn Swallow	G5	S5B
Ichthyomyzon castaneus	Chestnut Lamprey	G4	S3S4
Ixobrychus exilis	Least Bittern	G5	S2S3B
Lanius ludovicianus excubitorides	Loggerhead Shrike	G4T4	S2B
Lanius ludovicianus migrans	Loggerhead Shrike	G4T3Q	S1B
Macrhybopsis storeriana	Silver Chub	G5	S3
Margariscus margarita	Pearl Dace	G5	S5
Melanerpes erythrocephalus	Red-headed Woodpecker	G5	S2S3B
Numenius borealis	Eskimo Curlew	GH	SNA
Nycticorax nycticorax	Black-crowned Night-heron	G5	S3S4B
Pelecanus erythrorhynchos	American White Pelican	G3	S3S4B
Phalacrocorax auritus	Double-crested Cormorant	G5	S5B
Podiceps auritus	Horned Grebe	G5	S3B
Podiceps nigricollis	Eared Grebe	G5	S4S5B
Spea bombifrons	Plains Spadefoot Toad	G5	S2S3
Sterna caspia	Caspian Tern	G5	S3S4B
Sterna forsteri	Forster's Tern	G5	S4B
Strix varia	Barred Owl	G5	S3S4
Thamnophis sirtalis	Red-sided Garter Snake	G5	S4
Vermivora chrysoptera	Golden-winged Warbler	G4	S3B

Source: Manitoba Conservation Data Centre. Website Accessed July 2013.http://www.gov.mb.ca/conservation/cdc/ecoreg/lakembplain.html

Conservation Data Centre Rankings Definitions

Rank	Definition
1	Very rare throughout its range or in the province (5 or fewer occurrences, or very few remaining individuals). May be especially vulnerable to extirpation.
2	Rare throughout its range or in the province (6 to 20 occurrences). May be vulnerable to extirpation.
3	Uncommon throughout its range or in the province (21 to 100 occurrences).
4	Widespread, abundant, and apparently secure throughout its range or in the province, with many occurrences, but the element is of long-term concern (> 100 occurrences).
5	Demonstrably widespread, abundant, and secure throughout its range or in the province, and essentially impossible to eradicate under present conditions.
U	Possibly in peril, but status uncertain; more information needed.
H	Historically known; may be rediscovered.
X	Believed to be extinct; historical records only, continue search.
SNR	A species not ranked. A rank has not yet assigned or the species has not been evaluated.
SNA	A conservation status rank is not applicable to the element
G	Global
S	Sub-National

Other Heritage Codes

Code	Definition
G#G# S#S#	Numeric range rank: A range between two of the numeric ranks. Denotes range of uncertainty about the exact rarity of the species.

Subrank

Code	Definition
T	Rank for subspecific taxon (subspecies, variety, or population); appended to the global rank for the full species, e.g. G4T3.

Qualifiers

Code	Definition
B	Breeding status of a migratory species. Example: S1B,SZN - breeding occurrences for the species are ranked S1 (critically imperilled) in the province, nonbreeding occurrences are not ranked in the province.
N	Non-breeding status of a migratory species. Example: S1B,SZN - breeding occurrences for the species are ranked S1 (critically imperilled) in the province, nonbreeding occurrences are not ranked in the province.
Q	Taxonomic questions or problems involved, more information needed; appended to the global rank.
T	Rank for subspecific taxon (subspecies, variety, or population); appended to the global rank for the full species.
#	A modifier to SX or SH; the species has been reintroduced but the population is not yet established.
?	Inexact or uncertain; for numeric ranks, denotes inexactness.

Source: Manitoba Conservation Data Centre. Website Accessed July 2013. http://www.gov.mb.ca/conservation/cdc/consranks.html

Table D2: Species Listed by the Manitoba Endangered Species Act (MBESA), the Species at Risk Act (SARA) and the Committee on the Status of Endangered Wildlife in Canada (COSEWIC)

Scientific Name	Common Name	MBESA	SARA	COSEWIC
Vascular Plants				
Agalinis aspera	Rough Agalinis	Endangered	Endangered	Endangered
Agalinis gattingeri	Gattinger's Agalinis	Endangered	Endangered	Endangered
Buchloë dactyloides	Buffalo Grass	Threatened	Threatened	Threatened
Celtis occidentalis	Hackberry	Threatened	-	-
Chenopodium subglabrum	Smooth Goosefoot	Endangered	Threatened	Threatened
Cypripedium candidum	Small White Lady's-slipper	Endangered	Endangered	Endangered
Dalea villosa	Hairy Prairie-clover	Threatened	Threatened	Threatened
Platanthera praeclara	Western Prairie Fringed Orchid	Endangered	Endangered	Endangered
Solidago riddellii	Riddell's Goldenrod	Threatened	Special Concern	Special Concern
Spiranthes magnicamporum	Great Plains Ladies'-tresses	Endangered	Endangered	-
Symphyotrichum sericeum	Western Silvery Aster	Threatened	Threatened	Threatened
Tradescantia occidentalis	Western Spiderwort	Threatened	Threatened	Threatened
Veronia fasciculata	Western Ironweed	Endangered	-	-
Veronicastrum virginicum	Culver's-root	Threatened	-	-
Invertebrates				
Hesperia dacotae	Dakota Skipper	Threatened	Threatened	Threatened
Quadrula quadrula	Mapleleaf Mussel	Endangered	Threatened	-
Vertebrate Animal				
Ammodramus bairdii	Baird's Sparrow	Endangered	-	-
Anthus spragueii	Sprague's Pipit	Threatened	Threatened	Threatened
Athene cunicularia	Burrowing Owl	Endangered	Endangered	Endangered
Calcarius ornatus	Chestnut-collared Longspur	Endangered	Threatened	-
Caprimulgus vociferous	Whip-poor-will	Threatened	-	-
Chaetura pelagic	Chimney Swift	Threatened	Threatened	-
Chordeiles minor	Piping Plover	Endangered	Endangered	-
Chelydra serpentina serpentine	Common Snapping Turtle	-	Special Concern	-
Charadrius melodus	Common Nighthawk	Threatened	Threatened	-
Coturnicops noveboracensis	Yellow Rail	-	Special Concern	Special Concern
Falco peregrines anatum	Peregrine Falcon	Endangered	Special Concern	Threatened
Ixobrychus exilis	Least Bittern	Endangered	Threatened	Threatened
Lanius ludovicianus excubitorides	Loggerhead Shrike	-	Threatened	Threatened
Lanius ludovicianus migrans	Loggerhead Shrike	Endangered	Endangered	Endangered
Macrhybopsis storeriana	Silver Chub	-	Special Concern	Special Concern
Melanerpes erythrorhynchos	Red-headed Woodpecker	Threatened	Threatened	Threatened
Numenius borealis	Eskimo Curlew	Endangered	Endangered	Endangered
Podiceps auritus	Horned Grebe	Endangered	-	-
Vermivora chrysoptera	Golden-winged Warbler	Threatened	-	-

Sources:

Government of Canada. Species at Risk Public Registry website accessed July 2013. http://www.sararegistry.gc.ca/species/schedules

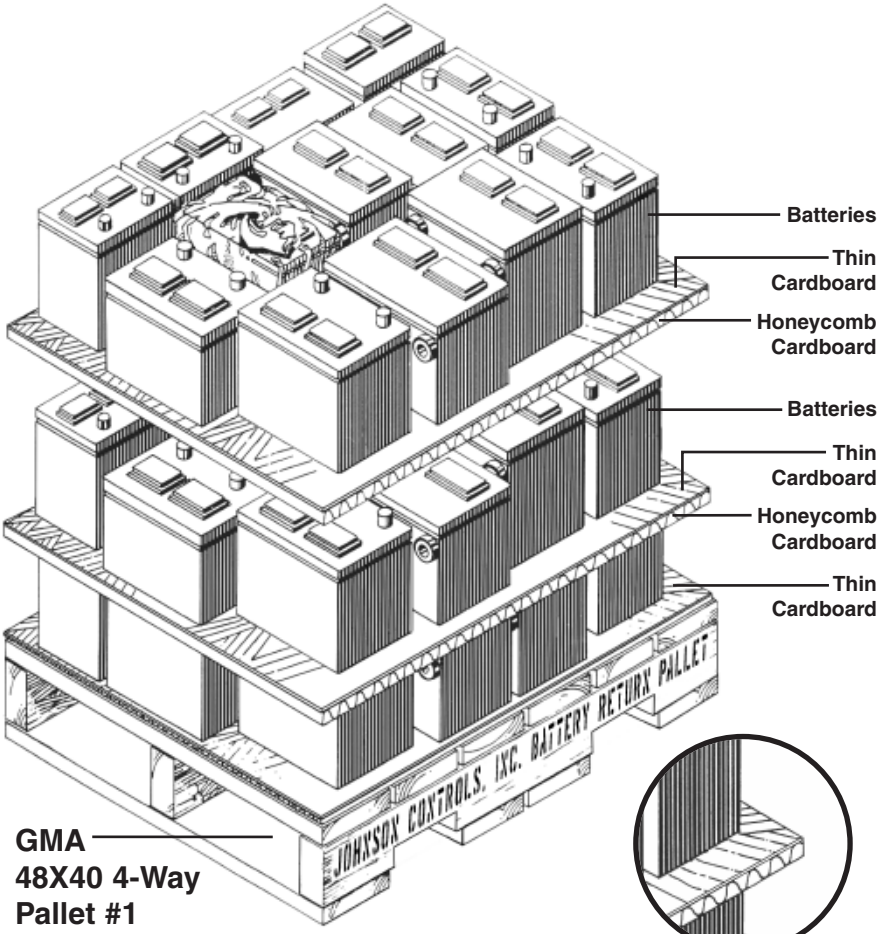
Manitoba Conservation. Wildlife Branch. Species Listed Under the *Manitoba Endangered Species Act* website accessed July 2013. https://www.gov.mb.ca/conservation/wildlife/sar/sarlist.html

COSEWIC. 2011. Canadian Wildlife Species at Risk. Committee on the Status of Endangered Wildlife in Canada. Web site: http://www.cosewic.gc.ca/eng/sct0/rpt/rpt_csar_e.cfm [accessed 17 October 2011]

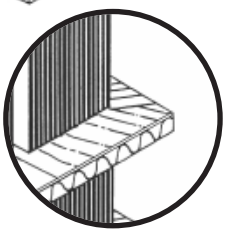
APPENDIX E

BATTERY CORE PROCEDURES

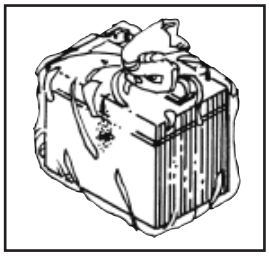
How To Properly Stack Used Batteries On Pallets



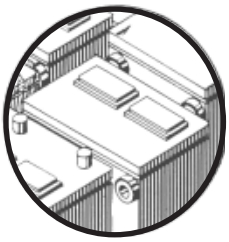
GMA 48X40 4-Way Pallet #1



Make sure there are no over hanging batteries.



Cracked and leaking batteries are to be bagged in plastic and stacked on top layer.



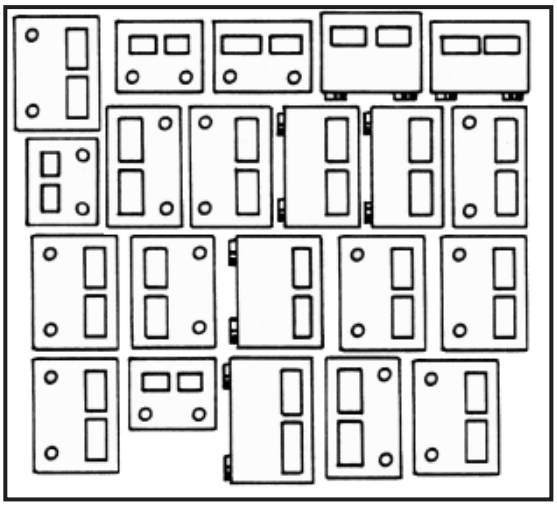
Correct

Incorrect

Arrange batteries to prevent terminals from touching each other.

Checklist

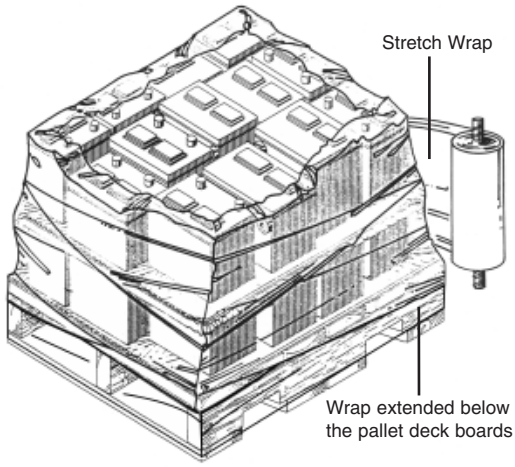
- ✔ A complete Johnson Controls, Inc. pallet is 3 layers with cardboard under all layers as illustrated above.
- ✔ No side terminals near each other
- ✔ No overhanging batteries
- ✔ Leaking batteries are bagged
- ✔ At least 7 wraps of 70 gauge stretch wrap tightly wrapped
- ✔ Wrap extended below the pallet deck boards
- ✔ No metal strapping or bracing materials
- ✔ Damaged casings and batteries should be placed on top layer



Top View - Mixed sizes of batteries typical layer 12-20 batteries

STEP 1

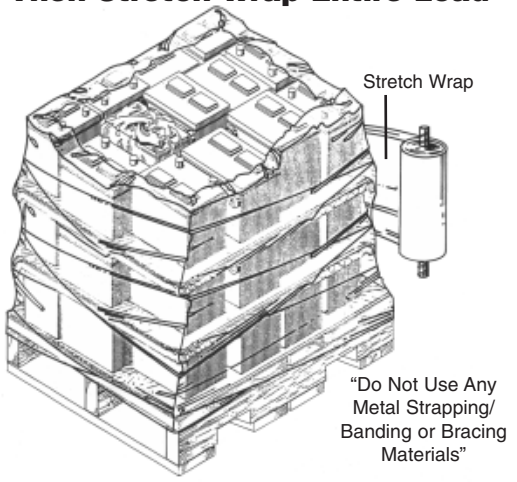
Load Batteries 2 Layers High, Then Stretch Wrap



Wrap tightly 7 times around, making sure to catch top of pallet to anchor load to the pallet.

STEP 2

Load 3rd Layer, Then Stretch Wrap Entire Load



Wrap tightly 7 or more times around, making sure to catch top of pallet to anchor load to the pallet.

APPENDIX F

EMERGENCY RESPONSE PLAN

RISK MANAGEMENT

SAFETY AND COMPLIANCE

EMERGENCY RESPONSE

- EMERGENCY RESPONSE PHONE NUMBERS
- ADJUSTERS
- TOWING COMPANIES
- ENVIRONMENTAL PHONE NUMBERS
- EMERGENCY RESPONSE GUIDELINES
- ACCIDENT REPORT (FROM SCENE)
- DANGEROUS GOODS OCCURRENCE GUIDELINES
- ACCIDENT REPORT LEVEL FLOW CHART
- U.S. ACCIDENT REPORT LEVEL FLOW CHART
- U.S. ACCIDENT REPORT (FROM SCENE)

UPDATED OCTOBER 2015

British Columbia Adjusters

Fort St. John

4 – 9831 98A Avenue
Fort St. John, BC V1J 1S3
Business Phone: 250-785-8544
Sid Belziuk: 250-261-1118

Prince George

Shumka Craig Moore
404 – 1488th Avenue
Prince George, BC V2L 4Y2
Peter Neuman: 250-564-5580

Abbotsford

ClaimsPro
100-2760 Tretheway Street
Abbotsford, BC V2T 3R1
888-235-2447
604-504-5331

Penticton

ClaimsPro
3390 Airport Road
Penticton, BC V2A 8X1
250-492-3828
877-492-3828

Kamloops

ClaimsPro
635 Victoria Street Suite 204
Kamloops, BC V2C 2B2
250-372-7166

Kelowna

ClaimsPro
202-1658 Commerce Ave
Kelowna, BC V1X 8A9
800-240-6744
250-862-4922

Nanaimo

ClaimsPro
2B-4488 Wellington Road
Nanaimo, BC V9T2H3
877-585-4010
250-585-4010

Revelstoke

1-1749 Emerald Drive
Revelstoke, BC V0E 2S0
250-837-6011

Trail

Kootenay Adjusting & Consulting Ltd
3-825 Spokane Street
Trail, BC V1R 3W4
Gary Kanda 250-364-3300
Cell 250-368-1276

Vancouver

600 – 1111 Melville Street
Vancouver, BC V6E 3V6
888-681-6331
604-681-6331

Victoria

204 – 990 Hillside Avenue
Victoria, BC V8T 2A1
866-382-2345
250-592-6300

Alberta Adjusters

Calgary

HBA Adjusters Ltd
201-1217 Centre Street NW
Calgary, AB T2E 2R3
Business Phone: 403-802-4243
Howard Friesen Cell 403-651-2433

Edmonton

Independent Risk & Claims Management
53210 Range Road 264
Spruce Grove, AB T7X 3H5
Business Phone: 780-960-4090
Cell Phone: 780-916-6086
Brian Coldwell

Fort McMurray

Shumka Craig Moore
10210 Centennial Drive
Fort McMurray, AB T9H 1Y5
Business Phone: 780-790-0090
Allan Plaggenhoet

Medicine Hat

Shumka Craig Moore
208, 1865 Dunmore Rd SE
Medicine Hat AB T1A 1Z8
Business Phone: 403-526-2920
Fax 403-526-5278

Grande Prairie

Shumka Craig Moore
11530 – 97 Avenue Suite 200
Grande Prairie, AB T8V 6R8
Business Phone: 780-539-7737
Marlene Lefebure

Peace River

Shumka Craig Moore
10022-99 Street
P.O. Box 6088
Peace River, AB T8s 1S1
Business Phone: 780-624-9696
John Berg

Red Deer

Shumka Craig Moore
4802 – 50 Street
Red Deer, AB T4N 1X4
Business Phone: 403-347-3285
Michael Murphy

Crawford Adjusters
200 – 4825 47 Street
Red Deer, AB T4N 1R3
Business Phone: 403-347-7747
Nancy Fish

Saskatchewan Adjusters

Regina

Shumka Craig Moore
374 University Park Drive
Regina, SK
Business Phone: 306-352-1635
Fax 306-352-1669
Dan Stinson 306-539-6997

Crawford Adjusters
2150 Scarth Street
Regina, SK
Business Phone: 306-586-4994

Saskatoon

Shumka Craig Moore
214 2750 Faithful Ave
Saskatoon, SK
Business Phone: 306-975-0950
Fax 306-975-0935

Jonathan Fast cell 306-370-7096

Manitoba Adjusters

Brandon

James Dube Spraggs Adjusters
2036 Currie Blvd. #7
Brandon, MB R7A 5Y1
Business Phone: 204-728-6126
Cell 204-729-6115

Crawford Adjusters
201 – 37 11th Street
Brandon, MB R7A 4J2
Business Phone: 204-727-7027

The Pas

Hawrysh Adjusters
Box 248
The Pas, MB
Business Phone: 204-623-7701

Thompson

Kernaghan Adjusters
304 – 83 Churchill Drive
Thompson, MB R8N 0L5
Business Phone: 204-677-2351

Winnipeg

McClarens Canada
395 Notre Dame Ave
Winnipeg, MB R3B 1R2
Business Phone: 204-663-2332
Cell Phone: 204-981-7733
Dave Lavergne

James Dube Spraggs Adjusters
Suite 207 – 675 Pembina Hwy
Winnipeg, MB R3M 2L8
Business Phone: 204-985-1200
Direct Phone: 204-985-1205
David Dube 204-981-5804

Ontario/Quebec Adjusters

Fort Frances

North Country Adjusters
815 Williams Avenue P.O. Box 207
Fort Frances, ON P9A 2R3
Business Phone: 807-274-7447
Toll Free Phone: 800-809-3096
Keith Knapp: 807-274-3224

Kenora

NWO Claims Services Inc.
P.O. Box 421
213 Main Street South
Kenora, ON P9O 3X4
Business Phone: 807-468-2028
Dan Loewen

Thunder Bay

Shumka Craig Moore
1204 Roland Street
Thunder Bay ON P7B 5M4
Business Phone: 807-623-7333
Toll Free Phone: 800-530-8256
Fax 807-623-4777

Toronto / Quebec

Crawford Adjusters
B3 2125 South Service Road W
Oakville, ON L6L 5W2

Chris Rutherford
416-803-4073
905-845-3801 ext 23
800-909-1170
Home 905-847-4724

ACE Trucking Program – Ontario

Where possible and practical, the following Appraisers should be used in Ontario:

Windsor, Sarnia, London Corridor:	Canadian National Appraisal 519-326-6116 Bob Bakes
Kitchener, Guelph	Somers Appraisal Services Ltd. 519-887-8686 Ross Somers
Brantford, Hamilton	Central Ontario Appraises Inc 905-276-5320 Barry and/or Jason Waring
St Catharines, Niagara Falls	Niagara Appraisal Services 1-800-996-6020 Wally Clark and/or Wally Ford
Greater Toronto Area Oshawa to Oakville	Golden Horseshoe Appraisals 905-564-1949 Bill Vrbetic
Newmarket and Barrie	Golden Horseshoe Appraisals 905-564-1949 Bill Vrbetic
Belleville to Cornwall Corridor	Wayne Hunt Appraisals 613-498-0394 Wayne Hunt

Quebec

Crawford Adjusters
7171 Jean Talon Est
Montreal, QC H1M 3N2

Mathieu Sirois
514-748-7300 ext 7649
514-212-9878 cell

Yukon Territories Adjusters

Whitehorse

Brouwer Adjusters / Alcan Adjusters
Suite 17 – 1114 1st Avenue
Whitehorse, YT Y1A 1A3
Business Phone: 867-668-4888 ext. 24
Cell Phone: 567-334-3038
Deborah Coyne

North West Territories Adjusters

Yellowknife

Arctic West Adjusters Ltd.
401-5204 50 Avenue
Yellowknife, NT X1A 1E2
Business Phone: 867-920-2212
After Hours Phone: 867-444-8005
Eric Kieken

United States Adjusters

Idaho

Frontier Adjusters
Hal Campbell
Coeur D'Alene, ID 208-773-9640
Night 208-773-0710

Oregon

Frontier Adjusters

Russell V. Storey
Hermiston OR 888-758-2201
Cell 509-947-5547

Alan Broadbent
Logan, OR 801-394-9928

Edward Gronich
Portland, OR 503-391-5685

Montana

Frontier Adjusters

Richard DaSilva
- Billings, MT
- Butte, MT
- Helena, MT 406-587-4222
Cell 406-570-4030

Larry Milligan
Great Falls, MT 406-727-9520
Cell 406-788-2636

Washington

Frontier Adjusters

Hal Campbell	Spokane, WA		509-924-3329
Kevin Krieg	Olympia, WA		888-815-6596
	Bremerton, WA		888-815-6596
Ron Abraham	Tacoma, WA		360-893-3399
		Cell	253-209-3440
John R. Walker SR	Seattle, WA		425-337-9798
		Cell	425-754-3474

Utah

Crawford Adjusters
Michael Schlaikjer
Salt Lake City, UT 801-268-0160
After hours 801-346-0300

North Dakota

Fargo Moorehead Adjusting Company 218-236-7860

Noble Adjustment Co
Grand Forks 701-772-4879

Minnesota

Cunningham Lindsay
Scott Hoey
Minneapolis/St Paul 952-897-3839
Cell 952-240-9412

Wisconsin and Illinois

Crawford Adjusters
Claims Alert Call Centre 877-346-0300
Mark Killion
Office 404-300-0258
Cell 440-570-0919

TOWING COMPANIES

BRITISH COLUMBIA

LANGLEY	CLOVER TOWING	1-604-513-1900
CRANBROOK	FREIGHTLINER	1-250-489-8781

ALBERTA

CALGARY	CITY WIDE TOWING	1-403-287-0030
EDMONTON	CLIFF'S TOWING 11480 156 ST EDMONTON AB, T5M 3N2	1-780-451-1555
RED DEER	ACE TOWING	1-888-466-5968 1-403-343-3909
	KEY TOWING	1-403-343-1668

SASKATCHEWAN

REGINA	CLUB TOWING 1200 TORONTO ST REGINA, SK S4N 0A1	1-306-543-2332
	ABC CENTRAL TOWING PO BOX 245 REGINA, SK	1-306-525-3022
SASKATOON	ASTRO TOWING 3015 MINERS AVE SASKATOON, SK S7K 8A1	1-306-242-2030
	BRIDGE CITY TOWING 140 29TH ST E SASKATOON, SK S7L 6Y6	1-306-244-3777

MANITOBA

WINNIPEG	DR HOOK	1-204-956-4665
	ALL RIG TOWING	1-204-782-5433 1-877-525-5744
BRANDON	ACCEL TOWING	1-204-728-2580

ONTARIO

KENORA/DRYDEN	GODBOUT BOX 681	1-807-548-5050 1-877-365-6491
KENORA	ALL RIG TOWING	1-807-548-7000 1-877-525-5744
IGNACE	ALL RIG TOWING	1-877-525-5744
NIPIGON COVERS: MARATHON/ GERALDTON/ LONGLAC/ THUNDER BAY	BEST TOWING	1-807-887-4357 1-800-417-1345
GERALDTON	LARRY'S 24 HOUR CELL	1-807-854-0484 1-807-854-7615

YUKON

WATSON LAKE	RUDY'S TRANSPORT	1-867-536-2123 1-867-536-7466

ADVISE THE RISK MANAGEMENT DEPARTMENT IN ADVANCE OF REPORTING ANY NON-EMERGENCY OCCURRENCES.

24 HOUR SPILL RESPONSE AND REPORTING

Federal **1-613-996-6666**

British Columbia 1- 800 - 663 - 3456

Alberta 1-800-272-9600 TDG
1-800-222-6514 (AB Environment)

Calgary: 1-866-249-7583 (Enviro Hazmat Emergency Response)
1-403-312-2424 (cell)

Edmonton: 1-780-416-6082 Shields Emergency Services
1-866-334-1290 (after hours)
Dave – emergency response coordinator

Manitoba Environment 1-204-945-4888

Saskatchewan Environment 1-800-667-7525

Ontario Ministry of Environment and Energy Spill Action Centre
800-268-6060

OFFER THE FOLLOWING DETAILS

- Company Name
- Location
- Type of Occurrence (urgent, non-urgent)
- Product Identification (UN # or MSDS #)
- Quantity
- Is Environment Assistance Required
- Resolution Process Undertaken (if any)
- Disposal Method (if any)
- Obtain an Incident or Reporting Number if available

Emergency Response Phone Numbers

Local Emergency Service – Dial 911

Risk Management Representative	24 Hour Response
24 Hour Cell	204-479-7040
Between 0800 hrs – 1700 hrs	204-631-0526

Environmental Emergency Lines

Manitoba Environment	24 Hour Emergency Line
Call collect	204-944-4888
Manitoba & NW Ontario	Hazmat Response
	204-957-6327
	204-925-9600
Saskatchewan Environment	24 Hour Emergency Line
	800-667-7525
Envirotec Waste Management	
Regina	306-721-9500
Saskatoon	306-244-9500
Alberta – CEDA	888-793-2378
British Columbia	800-663-3456
Philp Emergency Response Services	800-567-7455
United States HazMat Incident Reporting	800-424-8802

Emergency Response Procedures

Loss Event

For the purpose of this reporting procedure, a loss event includes all motor vehicle accidents, cargo claims (overages, shortages or damages), damage to equipment, theft, fires, environmental, property damage, etc.

Reporting of Loss Events

The reporting of the loss event is very critical to our ability to perform a thorough investigation, establish liability, and make applicable notifications and to reduce our cost by responding to the situation quickly. Please note that not all loss events require the same level of response. The level of response for each type of loss event is dependent on the type and severity of the loss.

Motor Vehicle Accidents

A motor vehicle accident is defined as a collision involving any moving Canada Cartage System (CCS) equipment with any object, vehicle, pedestrian or animal. An event also includes any equipment that leaves the roadway unintentionally regardless of whether a collision resulted.

The manner in which an accident situation is coordinated is dependent on the severity of the accident in terms of injuries, customer requirements, jurisdictional requirements, the extent of the damages, the company's financial exposure, and the degree of legal liability and the loss of company reputation.

Every accident situation is different but most situations can be classified into one of the following levels of severity; Level 1, Level 2 and Level 3. Level 1 is classified as the least severe.

Level 1

Although a Level 1 accident is less serious in terms of the response required, it still has the potential to be very expensive and should not be treated lightly. A Level 1 accident can be coordinated at the Operations and Maintenance level. This level of accident does not need to be escalated to the Risk Management department immediately. A Level 1 accident may involve minor injuries to our employees or minor damages to another person's (third party) vehicle. An accident is immediately escalated to a level 2 when there are injuries or possible injuries to a third party.

Some examples of a Level 1 accident are as follows:

- Animal strikes: Moose, deer, etc.

- Minor property damage accidents, such as hitting a dock, hitting a sign or post, hitting a parked unattended vehicle or any such object that does not result in environmental impairment. An approximate damage cost for Level 1 property damage accidents is less than $10,000.

- Single vehicle accidents such as driving off the road surface, minor jackknife accidents, hitting overhead objects, hitting objects on the road surface and sudden stop accidents.

- Minor collisions with third party vehicles. Level 1 collisions with third party vehicles usually involve hitting a parked vehicle or being hit by another vehicle. These types of collisions do not involve injury or the potential for injury. These accidents are sometimes difficult in making a proper assessment due to the possibility of injury after the fact. In some circumstances there are no injured parties at the scene of the accident but when the effects of shock and adrenaline wear off, several hours later, the third party may need or decide to seek medical treatment. The assessment of the situation is based on the information provided by our driver and other sources from the accident scene and always involves the possibility of injury. If the situation does or could result in a personal injury claim we must escalate it to a Level 2 accident without delay.

NOTIFY: Risk Management by way of faxing a completed copy of the accident notification report. Fax: 240-947-3083

Level 2

A Level 2 accident is more serious in nature and requires the immediate involvement of the Risk Management department. In most Level 2 accidents an independent insurance adjuster will be assigned to investigate the accident on the company's behalf. Depending on the location and severity of the accident the Risk Management department may dispatch a representative from the company to attend the accident scene. As soon as the Risk Management department has been notified of the accident they will assume responsibility for the accident recovery and investigation. They will coordinate these efforts in conjunction with the CCS Branch/Operations, Canada Cartage Fleet Management, CCS Customers, independent insurance adjusters, police or ambulance services, government agencies, recovery and repair facilities and all other involved parties.

Some examples of a Level 2 accident are as follows:

- All accidents involving injury to a third party.
- All accidents involving loss of $10,000 or greater.
- All accidents involving pedestrians, cyclists or minors.
- All accidents involving the transportation of dangerous goods.
- All accidents involving the release of product or diesel fuel into the environment.
- All rollover accidents or accidents resulting in fire.
- All accidents involving damages to reefers or heaters jeopardizing perishable cargo.
- All accidents involving insecure loads where cargo has released.

CONTACT: Risk Management 24 Hour Response. Phone: 204-479-7040

Level 3

A Level 3 accident is the most serious type of accident. The roles and responsibilities associated with a Level 2 accident are similar to those of a Level 2 accident but the nature of a Level 3 accident is such that they require the immediate involvement of the CCS Executive Management Team. The Risk Management department is responsible for reporting all Level 3 situations to the Executive Management Team immediately.

Some examples of a Level 3 accident are as follows:

- All accidents involving a fatality.
- All accidents with a major safety or pollution threat.
- All accidents involving media attention.

CONTACT: Risk Management 24 Hour Response. Phone: 204-479-7040

ROLES AND RESPONSIBILITIES

(Level 1 Motor Vehicle Accidents)

Drivers and Equipment Operators (including Owner Operators)

- Ensure the safety of your partner, yourself and any other individual at the scene of the accident by activating your hazard indicators, setting up reflective triangles and removing any sources of ignition, providing any such action does not endanger your safety.

- Report all accidents to the dispatcher immediately or at your first opportunity depending on the circumstances of the accident and whether you require medical treatment. Vehicles so equipped will report the accident via satellite message unless the accident has damaged the satellite equipment. If unable to use the satellite system or when the vehicle is not equipped, the report must be made by phone at your first opportunity. It is acceptable to request that the police report the accident to the company but always follow up to ensure that this has been done at your first opportunity. Never assume that someone else has reported the accident; it is your responsibility.

- Any time an accident involves damage to someone else's property or vehicle, the driver must remain at the scene of the accident until they are authorized by the dispatcher to leave. This is to ensure that we have collected all of the pertinent information to assist with the investigation. The driver may be asked to take photographs, sketch a diagram, collect information from witnesses and record all pertinent details of the accident while they are fresh in the driver's memory.

- When the accident involves a third party vehicle or property, the driver must utilize the accident reporting kit located in the truck/tractor. This involves taking photographs and filling out the booklet with as much information as possible to assist with the investigation and the collection of costs from at fault parties. We do not want to rely on police reports to provide us with third party particulars. It is always advantageous to collect this information at the scene of the accident if the third party is cooperative.

- Assist the police and/or the recovery company with any on scene requirements such as traffic control, cargo recovery and containment.

- Make an assessment of the cargo if you feel that there may be some damages due to load shifting. **Do not break any trailer seals until you have received instruction from your dispatcher.** If cargo has shifted, you are responsible for re-stacking the load or securing the load to ensure that it does not sustain further damage. Utilize the camera in the accident reporting kit to take photographs of any damaged cargo.

Dispatch and Operations Personnel

- When an accident satellite message has been received, an immediate reply must be sent to the driver acknowledging that the message has been received and further instructions will follow shortly.

- The first question dispatch should be asking is "**was anyone injured**".

- When an accident is being reported over the phone, keep the driver on the line until you have received enough information to make a severity assessment and establish the required response. If the driver must hang up before you have received all of the required information, find out the phone number where they can be reached and instruct them not to leave until you have all the particulars.

- Using all of the information provided by the driver or the person reporting the accident, review the circumstances of the accident to determine the level of severity and initiate the applicable reporting and response action plan.

- In most Level 1 motor vehicle accidents, the driver may be instructed to proceed with the load when the accident does not involve damage to third party property or vehicle(s), does not require a tow and does not require immediate mechanical repairs. These types of accidents may involve a deer or animal strike. It is acceptable for the driver to continue with the delivery as long as they have inspected the equipment and there is no possibility of mechanical defect. The driver should be instructed to stop at the next repair facility for a thorough vehicle inspection and they should pay attention to how the vehicle responds and tracks. Cosmetic damages should not result in operational delays.

- If the damages to the equipment do not allow for the load to continue, ask the driver all of the questions on the **Accident Report Form**. If the equipment needs to be towed, make the necessary recovery arrangements with a tow company. If you require assistance with these arrangements, contact Canada Cartage Fleet Management or Risk Management for assistance.

- Remind the driver to fill out the **Driver's Accident Handbook**. If someone else's property has been damaged, ask the driver to fill out the book with as much detail as possible and ask for the third party's name and telephone number. Instruct the driver to take photographs if the damage is serious.

- Remind the driver to verify that the cargo has not sustained damage and ensure that it doesn't sustain further damage by re-bracing the load if required.

- Serve as a resource to the drivers until the accident has been cleaned up and their tractor is back on the road. In some cases this may involve arranging for alternate transportation or putting the drivers into a hotel room. These arrangements should be made in conjunction with the Dispatch Supervisor.

- Complete the **Accident Notification Form** with as much detail as possible. Forward this form to your branch's Driver Supervisor or Operations Supervisor. It is not necessary to report Level 1 accident to Risk Management immediately. Fax a copy of the **Accident Notification Form** to Risk Management – **204-947-3083**.

Canada Cartage Fleet Management

- Assist Operations or Risk Management with any equipment related concerns resulting from a motor vehicle accident. This may involve providing expertise in the area of equipment repairs, attending accident scenes to perform emergency road repairs or coordinate hiring third party repair or towing companies.

- Maintain a list of suppliers who are able to provide towing and repair services. This list should be indexed by region and the services that they are able to provide and prepared in conjunction with the Operational Division and Risk Management.

- Canada Cartage Fleet Management is responsible for ensuring that post accident safety inspections and subsequent repairs are performed. Unfit equipment is not allowed to move.

ROLES AND RESPONSIBILITIES

(Level 2 Motor Vehicle Accidents)

Drivers and Equipment Operators (including Owner Operators)

- Ensure the safety of yourself, your partner and all other persons at the accident scene by keeping people away, assisting with traffic control, removing sources of ignition and ensuring that your equipment is safely off the lane of travel and clearly marked with triangles.

- Provide care and assistance to injured persons. Do not exceed your training limitations in this area. Unless you have taken a reputable first aid course such as St. John's Medical Assistance, the prudent course of action is to cover the injured person with a blanket to assist with their comfort but only move them if their lives are endangered by fire or threat of explosion. Ensure the third party vehicles are clearly marked if they are on the lane of travel.

- Report all accidents to dispatch immediately or at your first opportunity depending on the circumstances of the accident and whether you require medical treatment. Vehicles so equipped with report the accident via satellite message unless the accident has damaged the satellite equipment. If unable to use the satellite system or when the vehicle is not equipped, the report must be made by phone at your first opportunity. It is acceptable to request that the police report the accident to the company but always follow up to ensure that this has been done at your first opportunity. Never assume that someone else has reported the accident, it is your responsibility.

- For all Level 2 accidents, you must remain at the scene of the accident until you have been authorized by the Dispatcher, Operations Supervisor or Risk Management department to leave, unless you require emergency medical assistance. This is to ensure that we have collected all of the pertinent information to assist with the investigation and subsequent accident recovery. You may be asked to take photographs, sketch a diagram, collect information from witnesses and record all information while it is fresh in your memory.

- Refrain from making statements at the accident scene. Do not apologize for your actions. Do not talk about the accident particulars with any party other than a company representative or the police. Sometimes your perception of what happened may not be reality. It may be necessary for you to collect your thoughts and work through the chain of events in your mind before you will be mentally prepared to discuss what happened and give a statement to the police.

- You must cooperate fully with the police investigation but it is acceptable for you to advise the police that you would like to clear your thoughts before you give an official statement.

- For all Level 2 accidents you must complete the **Driver's Accident Handbook**. Fill in as much detail as possible to assist with the investigation and the collection of costs from at fault third parties. We do not want to rely on police reports to provide us with third party particulars. It is always advantageous to collect this information at the scene of the

accident if the third party is cooperative. Always use the camera provided to take photographs of the accident damages.

- Assist the police and/or the recovery company with any on scene requirement such as traffic control or cargo recovery and containment.

- Make an assessment of the cargo if you feel that there may be some damages due to load shifting. **Do not break any trailer seals until you have received instruction from your dispatcher.** If cargo has shifted, you are responsible for re-stacking the load or securing the load to ensure that it does not sustain further damage. Utilize the camera in the accident reporting kit to take photographs of any damaged cargo.

- Make arrangements in conjunction with the Dispatcher, Operations Supervisor or Risk Management department to spend the night in a hotel room if you do not require medical treatment. **It is mandatory for all drivers involved in a Level 2 accident to be grounded for 24 hours.** This is to avoid the possibility of accidents resulting from post traumatic stress disorder.

Dispatch and Operations Personnel

- When an accident satellite message has been received, an immediate reply must be sent to the driver acknowledging that the message has been received and further instruction will follow shortly.

- The first question dispatch should be asking is "**was anyone injured**".

- When an accident is being reported over the phone, keep the driver on the line until you have received enough information to make a severity assessment and establish the required response. If the driver must hang up before you have received all of the required information, find out the phone number where they can be reached and instruct them not leave until you have all of the particulars. It is natural for the drivers to want to get off the phone; they will be impatient with your questions, keep the drivers calm and continue to ask questions on the Accident Notification Sheet in a systematic manner.

- Using all of the information provided by the driver or the person reporting the accident review the circumstances of the accident to determine the level of severity and initiate the applicable reporting and response action plan.

- Coordinate any immediate requirements such as calling police, fire department, emergency medical services or government agencies.

- Contact Risk Management immediately after you have identified that the accident is a Level 2 situation. 24 Hour Cellular **204-479-7040**.

- Continue to coordinate the accident recovery in conjunction with Risk Management who may ask that you handle a specific aspect of the recovery. Ensure that you clearly understand what you are responsible for and always direct any inquiries to Risk Management.

- Remind the driver to complete the accident booklet and take photographs with the portable camera supplied to all highway tractors in the accident reporting kit if applicable.

- Make alternate driving or transportation arrangements for the driver. If necessary, make arrangements for the driver to spend the night in a hotel. It is mandatory that all drivers involved in a Level 2 accident be grounded for a 24 hour period. This is not a popular policy and most drivers will resist this. It is not an option. This policy is in place to ensure that we protect the company's liability interests by ensuring that we do not place a driver behind the wheel of equipment when they may be suffering from shock or post traumatic stress disorder. Shock affects people in different ways. We are not experts in recognizing shock that could occur several hours after a traumatic incident and its symptoms can be very severe. If a driver had a second accident due to effects of shock, we could be found negligent for allowing the driver to proceed.
- Serve as a resource to the driver until they are back on the road. This may involve arranging transportation or hotel rooms pending the approval of the Operations Supervisor, Dispatch Supervisor and Risk Management.
- Fax all paperwork and documentation associated with the accident to the attention of Risk Management at 204-947-3083 immediately.

Canada Cartage Fleet Management

- Coordinate the accident recovery in conjunction with Risk Management on an as required basis.

- Be prepared to respond to the accident scene to provide immediate repairs or equipment inspections.

- Responsible for all post accident safety inspections and subsequent repairs. Unfit equipment is not allowed to move.

Risk Management

- Record all of the particulars of the accident including who has reported it and the time it was reported. Record the phone number of the person reporting the accident.

- Record all of the details in terms of who has been notified of the accident. Determine if anyone else needs to be contacted or advised of the accident.

- Contact the local police services to determine the current status. Determine what has happened and identify what needs to be done both in terms of investigation and recovery or clean up. Identify very quickly what support we can provide to the process. Determine if a tow or recovery company has been contacted. If the police have not dispatched a tow company advise that we will look after this and will call back to advise when arrangements have been made with the tow company's ETA.

- Contact a tow or recovery company. Discuss the situation with them and discuss the recovery plan. You need to look at all of the variables associated with the accident situation. Know the equipment involved and the characteristics of the cargo before dispatching equipment. It is very wasteful and expensive to send the wrong equipment to an accident site. It is often a good idea to send the tow or recovery company representative to the scene to assess the situation and report back prior to dispatching too much equipment.

- Review the circumstances of the accident to determine if an independent adjuster needs to be assigned. Due to our current deductible levels, there are very few Level 2 accidents that will not require an independent adjuster.

- When assigning an independent adjuster, follow the independent adjuster contact list that specified which adjusting firm to contact for each specific region. Provide the adjusting firm with any required information. Provide the adjusting firm with specific instructions as to what we require at the accident scene. Also advise that we require copies of all reports and original photographs. They can confirm this with our insurer.

- Determine if it is necessary to send a company representative to the accident scene. Depending on the severity of the accident and the location of the accident it may be necessary to attend the scene or request a representative to attend the scene. Any time there is a fatality, serious injury to the drivers, extensive equipment damages, cargo that requires transferring at the scene, or if attendance by a company representative is requested by our customer, a government agency, or the police services, we will send a representative to the accident scene.

- **Persons Responding to an Accident Scene**

- In most circumstances you will be responding to an accident in inclement weather and road conditions. Please respond with caution and do not jeopardize your personal safety when asked to respond to an accident.

- You are responsible for the safety and well being of our drivers involved in the accident. If they are injured, ensure that they receive proper treatment. If the drivers were transported to a hospital for their injuries, you must check on the drivers to determine if they require anything for their personal comfort. You may need to make hotel or travel arrangements for the drivers.

- Coordinate the recovery of the cargo. Often, the cargo will need to be transferred at the accident scene into another trailer so that equipment can be up-righted or recovered. This must be handled in the safest, most cost effective manner while minimizing the damages to the cargo. You will be responsible for making this decision based on the information supplied to you by operations or the customer.

- Coordinate the recovery of the equipment. Typically, with equipment recoveries, the towing company will present you with a number of options as to how the job can be done. It is your responsibility to ensure that the job is done in the safest, most cost effective manner, while minimizing the damage to the equipment.

- Verify the amount of equipment and the number of workers at the accident scene. When we are presented with a bill after the recovery, it is your responsibility to confirm the equipment and the number of hours it was used. Always take photographs of the equipment used in accident recoveries.

- Meet with the investigating officer. They will provide you with insight as to the cause of the accident that will not appear on a police report. It is imperative to maintain a good working relationship with officers at an accident scene.

- Conduct an on-scene accident investigation. This involves taking directional photographs from an oncoming and lane of travel perspective. Photograph the damaged equipment. Photograph the road surface, specifically any road gauges or skid marks to assist with determining the point of impact. Take measurements of skid marks and road surface markings to be used in a detailed diagram. Sketch a rough diagram of the scene that you can enhance with your measurements and photos at a later date. You are trying to determine the point of impact and the point of possible perception. If it is a single vehicle accident you are trying to find evidence of another vehicle or animal which may have caused our unit to go off the roadway. You also want to determine the point that our equipment left the roadway and any evasive action such as brake applications or steering.

- Conduct interviews with our drivers. First spend at least a half hour talking about the situation and try to clarify in your own mind what may have happened and then walk the driver through the chain of events leading up to the accident. In a situation involving

serious injury or death, the insurance adjuster will perform the task of taking statements from our driver for legal liability reasons.

- Interview any witnesses or third parties if they are available. In a situation involving serious injury or death, the insurance adjuster will perform these interviews.

- Communicate all aspects of the investigation and recovery to the Operations Supervisor, Branch Manager and Director of Risk Management. Provide status updates at least every two hours.

- File a complete report on the entire accident response documenting all activities and decisions made as well as how the recovery turned out. This report will be accompanied with all of the photographs, diagrams, statements and any other information collected at the scene. This report will be provided to the Director of Risk Management.

ROLES AND RESPONSIBILITIES

Level 3 Motor Vehicle Accidents

Drivers and Equipment Operators (including Owner Operators)

- The roles and responsibilities in the event of a Level 3 accident are very similar to those identified in the case of a Level 2 accident with the exception that Level 3 accidents require the involvement of considerably more company representatives due to the seriousness of the accident. You must ensure that all of your responsibilities identified in a Level 2 accident are followed very closely. Communication is very important in a Level 3 accident situation. If you are unclear about your responsibilities do not hesitate to discuss your concerns with the Dispatcher, the Operations Supervisor, the Dispatch Supervisor or the Director of Risk Management.

Dispatch and Operations Personnel

- The responsibilities of a Level 3 accident are very similar to those of a Level 2 accident. It is important to recognize a Level 3 situation and escalate it to Risk Management immediately. Do not delay in escalating these situations. Refer all requests for information to Risk Management who will be acting in conjunction with the Executive Team.

Risk Management and Persons Responding to a Level 3 Accident

- Escalate the accident to the Executive Team immediately.

- You will be involved in the development of an action plan in conjunction with the Executive Team.

- When you are sent to the accident scene, ensure that you understand your responsibilities very thoroughly. Establish who your primary Executive Team contact person is and maintain periodic contact with that person throughout the investigation and recovery.

- Follow all of the requirements identified in the Level 2 accident response guidelines.

- Provide status updates to the Executive Team contact every two hours until the situation has been de-escalated.

- Direct all media inquiries to the Executive Team. You are not authorized to speak to the media. Do not answer their questions with comments such as "No Comment". This may be interpreted as evasive and may be construed as trying to hide something. An acceptable response to a media inquiry is "we are in the process of conducting a thorough investigation; our Executive Team will share the results of the investigation when it has been concluded".

- Pay extreme attention to details. Complete every task that you are involved in to the very best of your ability. Make notes and record every conversation that you are involved in. If you are uncertain about any particular aspect, do not hesitate in contacting the Executive Team member. The only really bad decisions are ones that are made without thinking the situation through. Do not feel that you need to rush, exercise extreme caution and diligence.

Accident Report from the Incident Scene

Explanation from our driver of what actually occurred in the accident:

Date:_____Time:_____Location:_____

_____

_____

_____

If this accident occurred in the U.S. please go to the U.S. Accident Tab!

Are police in attendance? **Y / N**

If **Yes**, get all police information, include:

A. Police Force:_____B. Officer's Name:_____

C. Police Report # _____D. Phone Number:_____

If the police have not been contacted determine who will contact them if damages exceed $500, if anyone was injured or if the incident resulted in a reportable Dangerous Goods occurrence.

Has anyone else been injured? **Y / N**

If **Yes**, Describe:_____

If **Yes**, tell our driver to get the name and address of injured parties from attending police.

Is there an environmental spill **Y / N**

If **Yes**, Describe:_____

Has hazmat/cleanup attended **Y / N**

If **Yes** Who: _____

Are recovery vehicles required? **Y / N**

What is required?_____

Have police arranged for recovery vehicles already or are they leaving that up to CCS personnel?

POLICE / CCS

Has equipment been moved? **Y / N**

If **Yes**, Where/Contact info include phone number, name and address

_____

IMPORTANT: If driver can't be contacted via satellite, record phone number where driver can be located:

Hotel:_____ Other:_____

Record instructions given by yourself to the driver:

_____

_____

_____

NOTES:

_____

_____

_____

Make severity assessment as per Emergency Response Guidelines.

Level _____

CONTACT THE 24 HOUR RESPONSE TEAM IMMEDIATELY TO REPORT ALL LEVEL 2 & LEVEL 3 ACCIDENTS. **204-479-7040** and FAX 204-947-3083 ATTN: RISK MANAGEMENT

Signature:_____

Print Name:_____

DANGEROUS GOODS OCCURRENCE
Emergency Response and Incident Reporting Guidelines

A Dangerous Goods Occurrence is defined as follows:

- A spill of any quantity of dangerous goods which represents a danger to health, life, the environment or property.
- A transportation accident involving any vehicle or equipment carrying dangerous goods (this includes but is not limited to, forklift, car, van, truck, tractor, trailer, tanker, rail car, etc.)
- A fire or explosion involving dangerous goods.
- Damage to a container/package that contains or is intended to contain dangerous goods.
- Loss or theft of a dangerous good product/shipment.

PERSONAL SAFETY GUIDELINES

In the event of an occurrence involving Dangerous Goods, the following instructions are issued as guidelines only; personal safety shall take precedence over protection of property, the environment and all operational concerns.

1. Ensure your personal safety and that of all others in the vicinity takes first priority.
   - Warn others of the potential hazard and offer reasonable assistance with evacuation, if necessary.
   - At no time are you required to risk your personal safety or that of others in containing or combating the hazard.

2. Assess the severity of the occurrence.
   - Is there a fire, a spill or a leak.
   - Identify the Dangerous Goods.
   - Who/What is at risk: people, property or the environment.
   - Refer to the Emergency Response Handbook for safety precautions regarding the hazard.
   - Can the occurrence be contained and/or combated with emergency equipment immediately available to you.

3. If it is safe to do so, exercise reasonable efforts to eliminate or contain the hazard.
   - Eliminate all sources of ignition.
   - Avoid inhalation of fumes, smoke and vapors.
   - Obtain assistance, if available.
   - If available and appropriate, don personal protective equipment and use spill-kit materials to support containment efforts.

4. If the hazard possesses too great of a danger, contact the local Emergency Response Agency – dial 911.

5. At the first opportunity contact your on-duty supervisor /dispatch to notify them of the situation, offering them the following information:

    - Location
    - Type of occurrence (vehicle accident, spill, leak, fire, etc.)
    - Type and quantity of Dangerous Goods
    - Severity of occurrence (volume of spill or leak, fire, injuries, etc.)
    - Advise if local fire and police departments have been notified
    - Whenever possible have the shippers Dangerous Goods documentation available for reference purposes

DANGEROUS GOODS OCCURRENCE
Emergency Response and Incident Reporting Guidelines

The person in charge of the dangerous goods at the time of the dangerous occurrence shall immediately notify or cause to be notified all of the following:

- Emergency Response Services (fire, police, ambulance), if required.
- On-duty Supervisor or Dispatch personnel.

SUPERVISORS / DISPATCH PERSONNEL

Upon receiving notification of a dangerous goods occurrence the following information must be obtained and recorded:

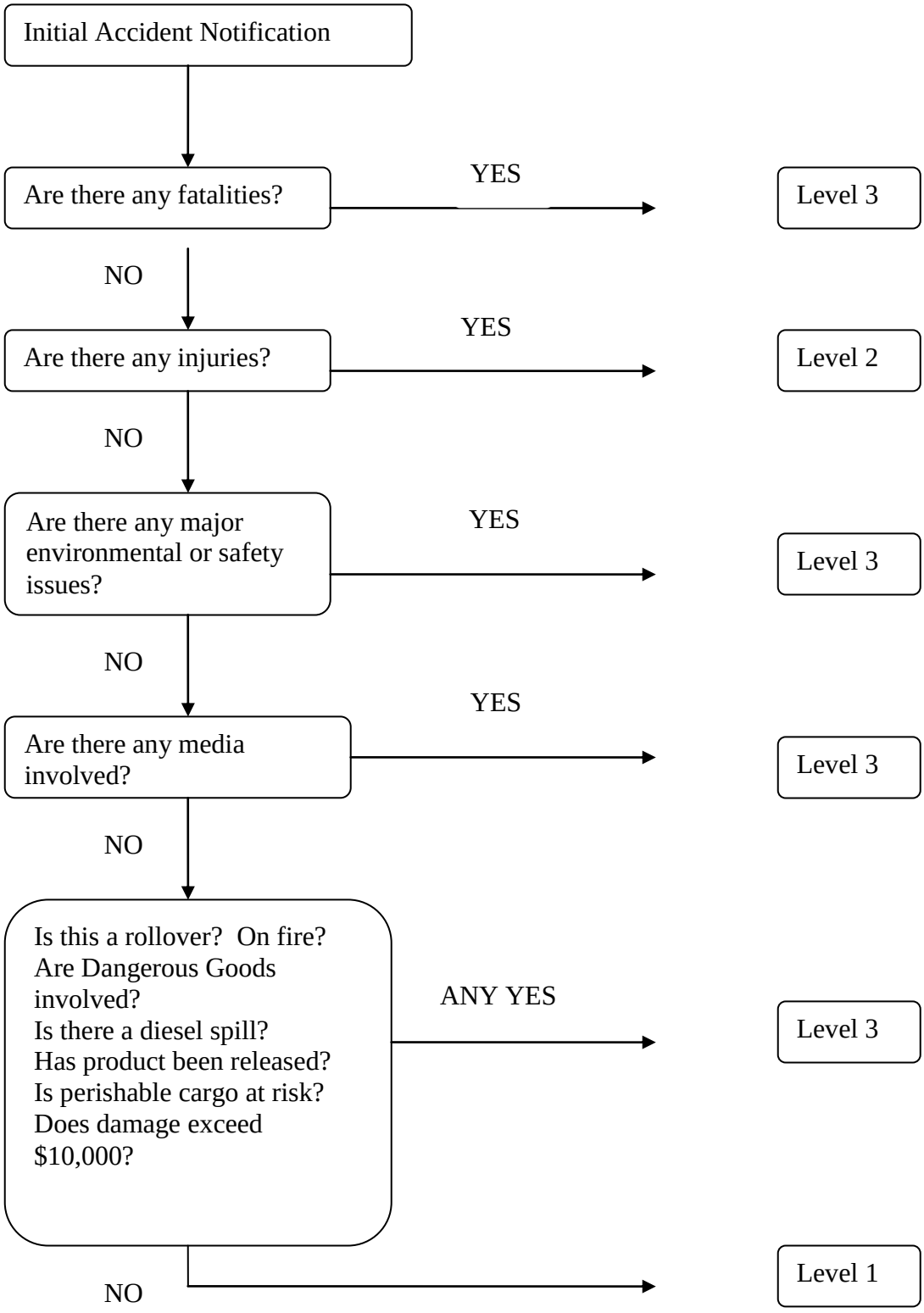
- Location
- Type of occurrence (vehicle accident, spill, leak, fire, etc.)
- Type and quantity of Dangerous Goods
- Severity of occurrence (volume of spill or leak, fire, injuries, etc.)
- Have local fire and police departments been notified
- Shippers and Receivers name and address
- Contact telephone numbers and product specified off the shippers Dangerous Goods documentation

Determining the Level of Severity and Response Requirements

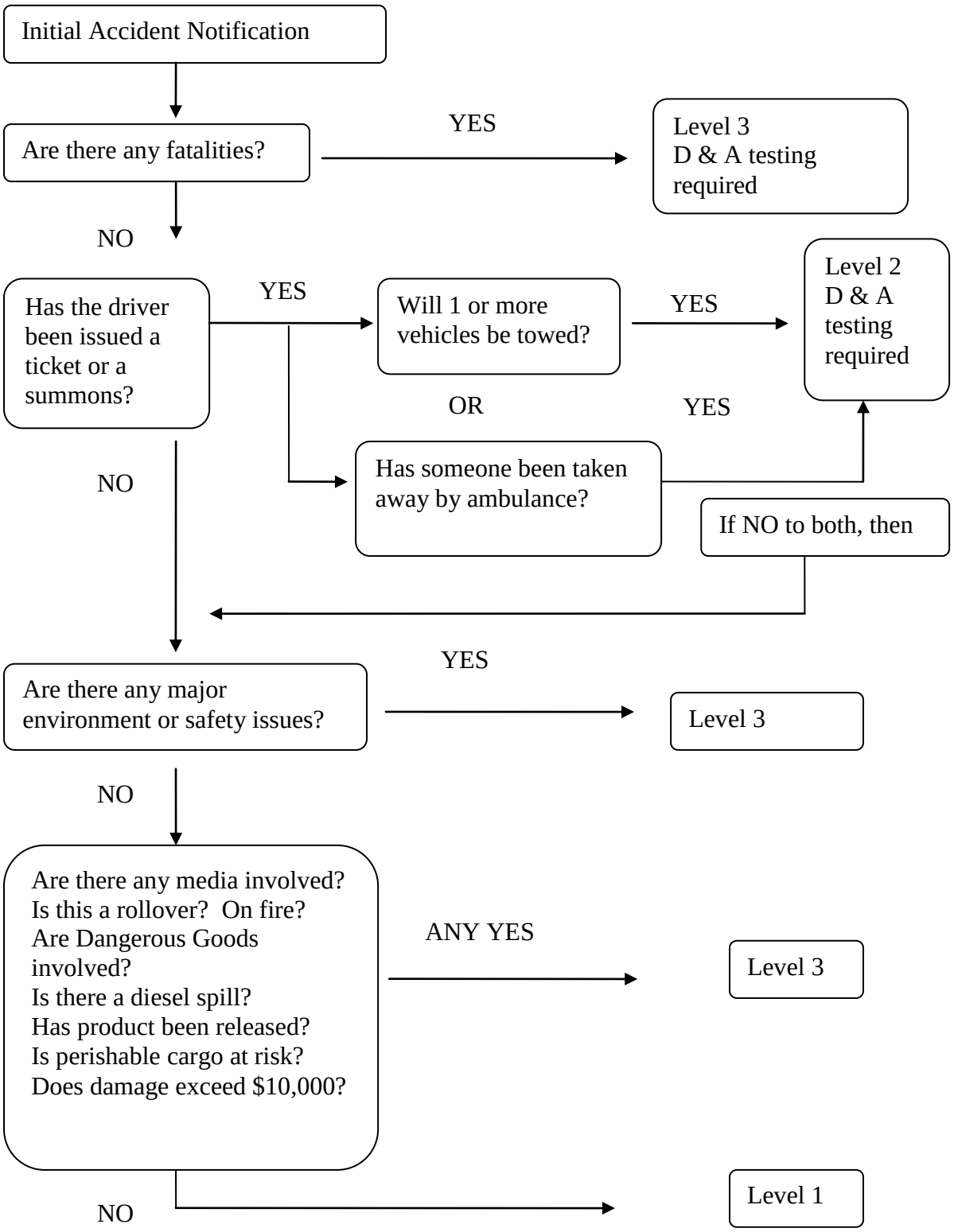
The list below provides quick reference to determining the appropriate level of response for each class and volume of dangerous goods. Please make reference to the Lass Event Procedure for details.

Class	Description	Quantity	Level of Response
1	Explosive (all divisions)	At any Quantity	Level 3
2	Flammable Gas (all divisions)	At any Quantity	Level 3
3	Flammable Liquid	Less then or equal to 5 Litres	Level 2 escalate to Level 3 if exceeds 5 liters
4	Flammable Solid (all divisions)	At any Quantity	Level 3
5	Oxidizers / Organic Peroxides	At any Quantity	Level 3
6	Poisonous and Infectious Substances	At any Quantity	Level 3
7	Radioactive Materials	At any Quantity	Level 3
8	Corrosive Substances	Less then or equal to 5 Litres	Level 2 escalate to Level 3 if exceeds 5 liters
9	Miscellaneous Substances	At any Quantity	Level 3

Accident Reporting Flow Chart



U.S. Accident Reporting Flow Chart



U.S. Accident Report from the Incident Scene

Explanation from our driver of what actually occurred in the accident:

Date:_____Time:_____Location:_____
(state / highway / mile marker / town)

_____

_____

_____

POST ACCIDENT alcohol and drug testing is MANDATORY IF A FATALITY HAS OCCURRED
OR our driver has been or will be charged as a result of this accident **AND** one or more vehicles have been towed **OR** an ambulance has taken someone to hospital.

POST ACCIDENT alcohol testing must be done within 8 hours! Contact the Risk Management dept immediately: cell 204-479-7040.

IMPORTANT: If driver can't be contacted via satellite, record phone number where driver can be located:

Hotel:_____ Other:_____

Are police in attendance? **Y / N** **Has Driver been Charged? Y / N**

If "**Yes"** get all police information, include:

A. Police Force:_____B. Officer's Name:_____

C. Police Report # _____D. Phone Number:_____

If the police have not been contacted determine who will contact them if damages exceed $500, if anyone was injured or if the incident resulted in a reportable Dangerous Goods occurrence.

Has anyone else been injured? **Y / N**

If "**Yes"** Describe:_____

If "**Yes"** tell our driver to get the name and address of injured parties from attending police.

Is there an environmental spill **Y / N**

If "**Yes**" Describe:_____

Has hazmat/cleanup attended **Y / N**

If "**Yes"** Who: _____

Are recovery vehicles required? **Y / N**

What is required?_____

Have police arranged for recovery vehicles already or are they leaving that up to CCS personnel?

POLICE / CCS

Has equipment been moved? **Y / N**

If **Yes**, Where/Contact info include phone number, name and address

_____

Record instructions given by yourself to the driver:

_____

_____

_____

NOTES:

_____

_____

_____

Make severity assessment as per Emergency Response Guidelines.

Level _____

CONTACT THE 24 HOUR RESPONSE TEAM IMMEDIATELY TO REPORT ALL LEVEL 2 & LEVEL 3 ACCIDENTS. **204-479-7040** and FAX 204-947-3083 ATTN: RISK MANAGEMENT

Signature:_____

Print Name:_____

APPENDIX G

FIRE SAFETY PLAN

FIRE AND EMERGENCY PROCEDURES MANUAL

WAREHOUSE SAFETY MANUAL

EMERGENCY PROCEDURES ORGANIZATION

The purpose:

- To establish a method of systematic, safe and orderly evacuation of the building, in order to safeguard human lives.

- To safely organize the use of available fire applications, as may have been provided for the controlling or extinguishing of fire, to limit damage to property.

This manual is divided as follows:

I. Evacuation

A. Organization

B. Duties of key personnel

II. Fire Fighting

A. Descriptions of fire fighting equipment

B. How to use this equipment

Appendix I

Memorandum to Floor Wardens

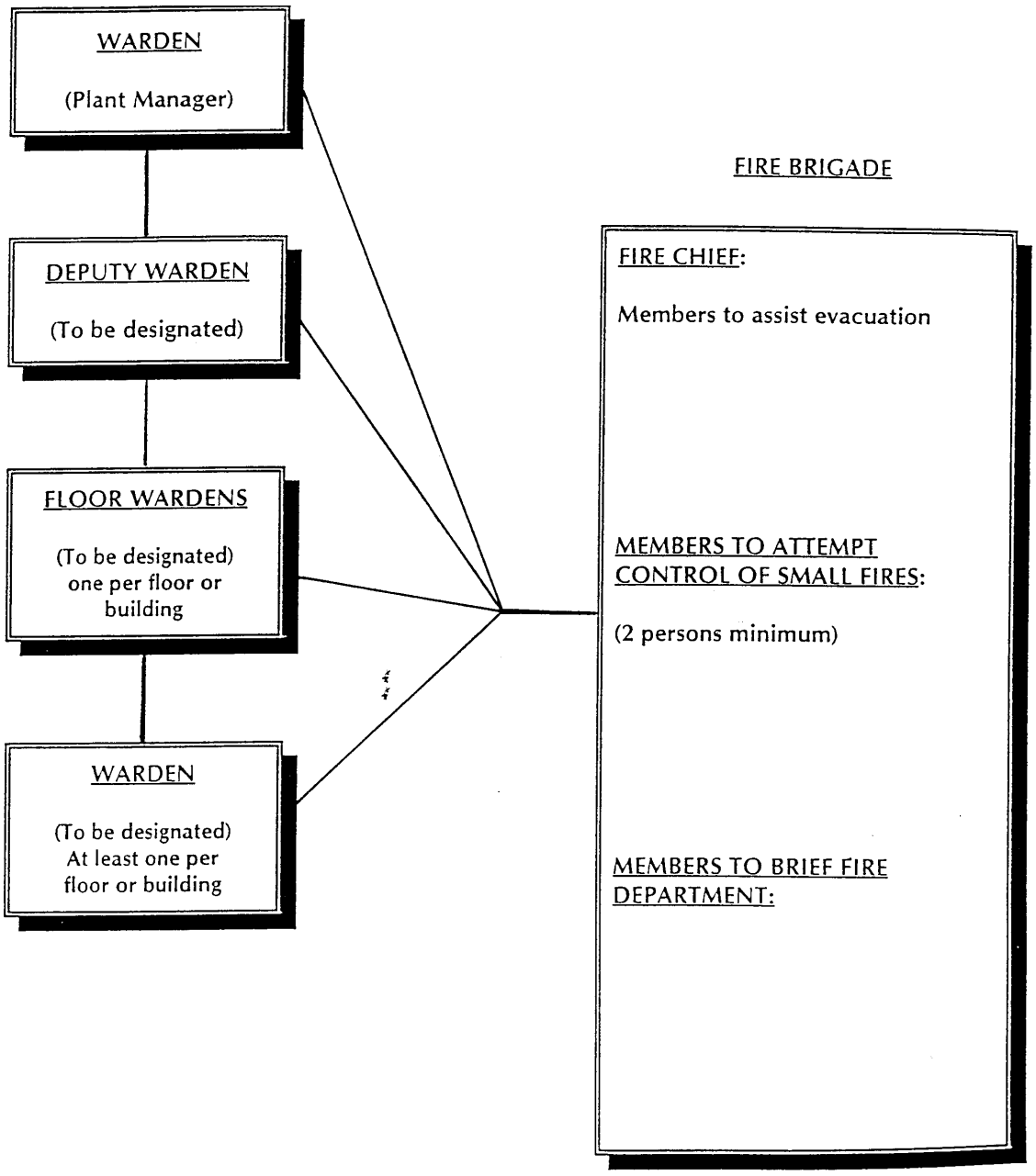
I. **Evacuation**

The prime consideration in deciding to evacuate the building, is the preservation of life and prevention of accident or injury. This can only be achieved if the following conditions are found:

1. An evacuation plan must be prepared in advance and implemented when required.
2. Department Managers must provide direction and leadership.
3. All employees must know, ahead of time, that such a plan exists and must e familiar with it.
4. The Evacuation Plan must be coordinated with the Fire Fighting Plan.

A. **Organization**

The following flow chart will best exemplify this organization as it may be used for your warehouse/office.


WARDEN
(Plant Manager)
DEPUTY WARDEN
(To be designated)
FLOOR WARDENS
(To be designated)
one per floor or
building
WARDEN
(To be designated)
At least one per
floor or building
FIRE BRIGADE
FIRE CHIEF:
Members to assist evacuation
MEMBERS TO ATTEMPT
CONTROL OF SMALL FIRES:
(2 persons minimum)
MEMBERS TO BRIEF FIRE
DEPARTMENT:

1. The Manager will be known as the Warden and will take charge in the event of an emergency. He /She will issue instructions to the Floor Wardens.

2. The Manager will appoint a Deputy or Deputies who will be in charge in his/her absence.

3. Floor Wardens are to be appointed for all floors or buildings as may be dictated by the size of the building(s), who in turn, are to appoint a Deputy or Deputies who will be in charge in his absence.

4. The name and location of the Warden, Floor Warden and Deputies, will be posted in a conspicuous location so that every person concerned should know who the Floor Warden is and where he/she is located.

5. The Floor Warden will appoint Exit Guards and Monitors who will assist him/her in his/her duties in the event of an emergency.

6. Procedures, which are to be followed by Floor Wardens, are set out in the attached separate memorandum entitled "Duties and Responsibilities of Floor Wardens". These procedures should be read and understood by each Floor Warden and Deputies, any queries that may arise should be cleared with the warden.

7. Floor Wardens and everyone else at the warehouse will be instructed on the use of various types of fire extinguishing apparatus available on the floor.

8. Besides duties in the event of an emergency, everyone is expected to interest himself or herself in Fire Prevention and to point out to the Warden practices which could lead to fire or other hazards.

9. <u>Alarm Transmission</u>

   Any person discovering fire or smoke should without delay cause the transmission of an alarm of fire by any of the following methods available:

   1. Telephone Fire Department
   2. Notify Warden and/or Deputy Warden that alarm has been transmitted.

B. **Duties of Key Personnel**

Warden's Duties

1. Be familiar with the Fire Safety Plan that has been drawn up.

2. Select your qualified employees for a Fire Brigade and organize, train and supervise such Fire Brigade.

3. Be responsible for the availability and state of readiness of the Fire Brigade.

4. Conduct fire and evacuation drills.

5. Be responsible for the designation of the Floor Wardens and Deputy Floor Wardens.

6. Be responsible for a daily check for the availability of the Floor wardens and Deputy Floor Wardens and see that up-to-date organization charts are posted.

7. In the event of a fire, shall report to the Fire Command Station to supervise, provide for and coordinate:

    a. Ensure that the Fire Department has been notified of any fire or fire alarm.

    b. Manning of the Fire Command Station.

    c. Directions of evacuating procedures as provided in the Fire Safety Plan.

    d. Reports on condition of fire for the Fire Department on their arrival.

8. The Warden will, from time to time, keep the Floor Wardens informed of any changes in procedures that are considered desirable.

Deputy Warden's Duties

1. Subordinate to the Warden.

2. Perform duties of Warden in his/her absence.

Floor Wardens and Deputy Floor Wardens' Duties

1. Each Floor Warden and Deputy Floor Warden shall be familiar with the Fire Safety Plan, the location of exits and the location and operation of any available fire alarm system.

2. In the event of fire or fire alarm, the Floor Warden shall ascertain location of the fire and direct the evacuation of the are in accordance with directions received. Floor Wardens and their Deputies shall see that all occupants are notified of the fire and that they proceed immediately to execute the Fire Safety Plan.

Fire Brigade Duties

1. On receipt of an alarm for fire, the Fire Brigade shall:

    a. Report to scene of fire to assist in evacuation if necessary.

    b. After evacuation, endeavor to control speed of fire by closing doors etc.

    c. Attempt to control the fire until arrival of the Fire Department, if the fire is small and conditions do not pose a threat.

    d. On arrival of the Fire Department, direct them to scene of fire.

II. **FIRE FIGHTING**

A major fire needed not happen in your warehouse if you follow the four simple steps below. Use them as the basis for planning your own emergency procedures. Make sure every member of your staff knows exactly what they must do in the event of a fire.

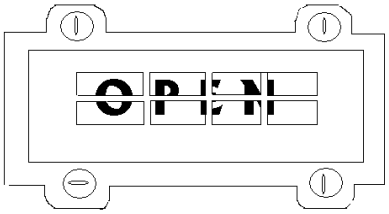
1. SPRINKLER CONTRL VALVES MUST BE OPEN.

2. PHONE THE FIRE DEPARTMENT.

3. FIGHT THE FIRE – USE EXTINGUISHERS.

4. MAKE SURE THE SPRINKLER VALVES ARE NOT SHUT BEFORE THE FIRE IS OUT.

Post Indicator Valves and Wall-mounted Post Indicator Valves are open when the indicator inside the post reads “OPEN”.



The Screw-and yoke Valve is open when the centre screw is sticking out.

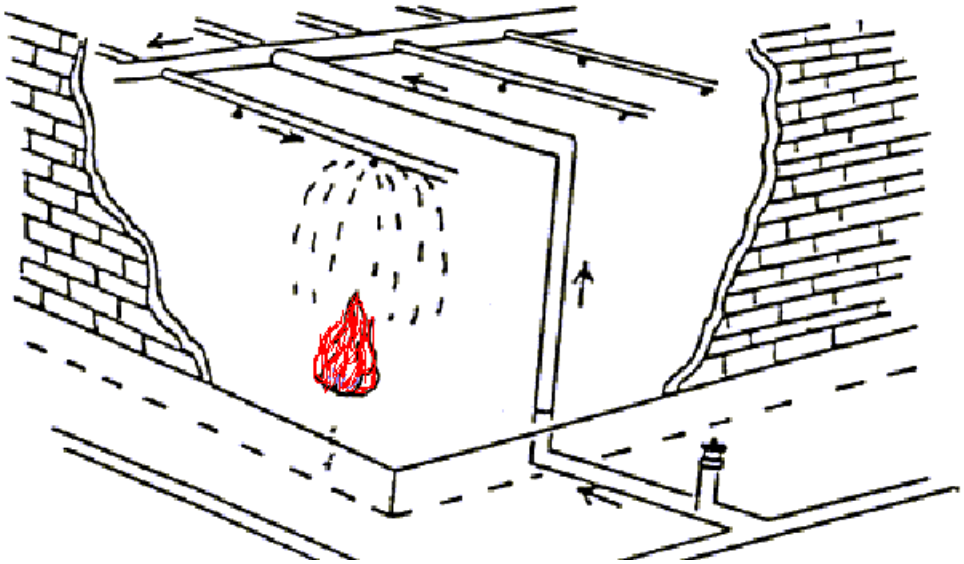
The next important stage in the sprinkler system is the Clapper valve and the devices connected to it. The clapper valve (1) sits on top of the main riser pipe and separates the water from the city main (2) from the water already in the system. The waster already in the system is kept under pressure by the pump (3).

When the sprinkler heads open the pressure in the upper pipe is relieved thus permitting the Clapper valve to open, letting more water into the system. When this happens water also starts to flow through smaller pipes to the alarm systems: A rotary water gong (4), a local electrical alarm (5), and a signal to the alarm company (6).

1. **THE SPRINKLER SYSTEM**

The best protection you have against a major fire is the sprinkler system.

Water enters the sprinkler system from the city water main. It goes though the sprinkler system from the city water main. It goes through the sprinkler control valve to the main ceiling pipes and then to the individual sprinkler heads, from which it is sprayed on a fire.



IT ONLY WORKS, HOWEVER, IF THE SPRINKLER CONTROL VALVE IS OPEN.

2. **CALL THE FIRE DEPARTMENT**

Making sure the sprinkler valve is open is the first step. The second step is calling the Fire Department even if the sprinklers are working. The faster you get professional help, the easier it will be for you.

Have the telephone number of the fire Department in plain view near the telephone.
Designate at least one employee per shift, and at least one alternate, to handle this task. Remember, however, the person on fire duty has the final responsibility to make sure the Fire Department has been called.

3. **FIGHT THE FIRE**

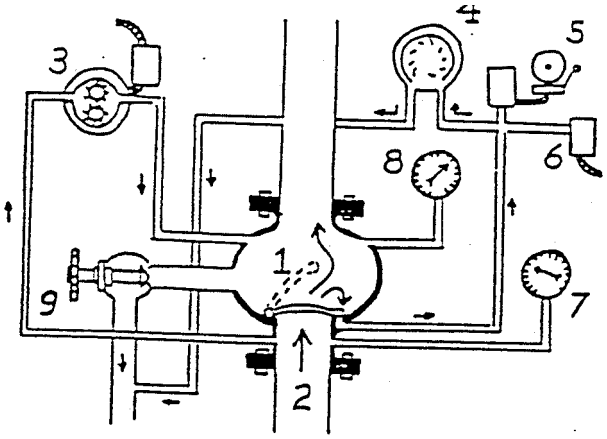
Step three begins as soon as the fire starts, even while the Fire Department is being called. Use the equipment in your warehouse to fight the fire before it even sets the sprinkler system off.

The type of extinguisher that should be used depends on the type of fire.

	TYPE OF EXTINGUISHER		
TYPE OF FIRE	**WATER PRESSURE**	**ABC DRY CHEMICAL**	**CO_2**
A Ordinary Combustibles: Wood, paper, cardboard, clothing, plastic, etc.	Preferred	Only partially effective	Second choice
B Oil or grease fires	**NO** Dangerous	Preferred	Very good
C Electrical fires: panels or wiring	**NO** Dangerous	Effective	Preferred

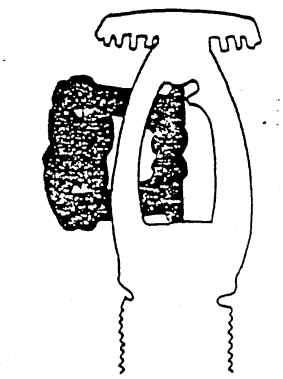
The lower gauge (7) shows the pressure of the water from the city main while the upper gauge (8) shows the pressure of the water in the system.

The final element is the drain valve (9). It is used to drain the system after a fire and to make sprinkler system tests.

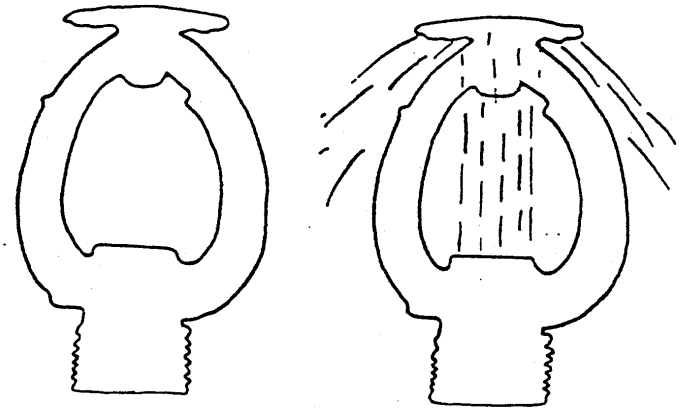


Above the Clapper valve the water is carried through pipes tot he ceiling where it enters the main sprinkler pipes. It then continues into smaller pipes organized in a grid and finally ends up at the sprinkler heads.

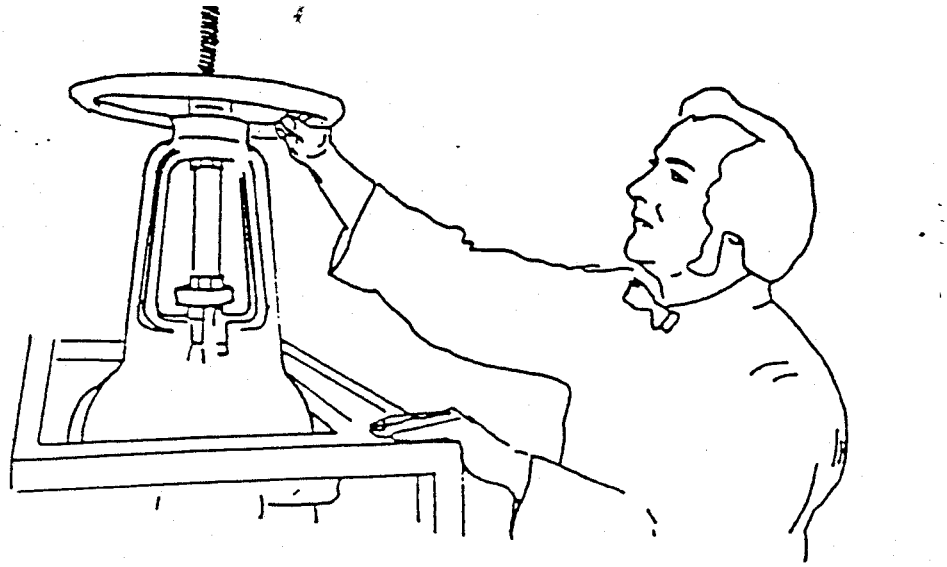
The sprinkler head consists of two parts. The body of the sprinkler head is what spreads the water when it is operating. In the centre is a fusible link that pops out when the temperature at the ceiling reaches 74 degrees Celsius.



When the link pops out water flows: if the main sprinkler control valve is open.



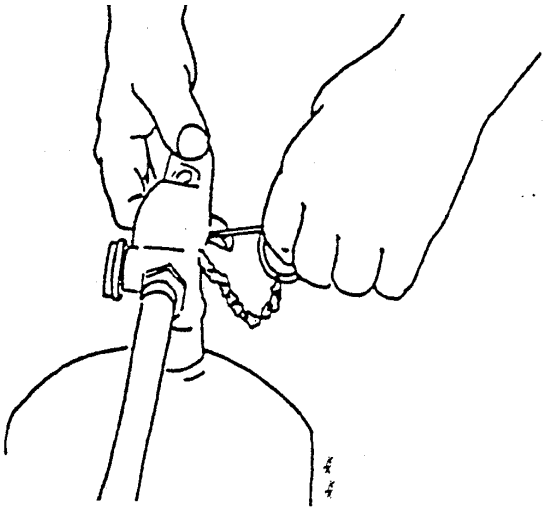
If a fire occurs, immediately send on of your employees to the sprinkler control valve. The employee should stand and make sure that the valve stays open until the Fire Chief tells him to close it. Naturally, he should not endanger his life in doing this task.



Extinguishers are located according to the type of fire most likely to occur in the area near the extinguisher. Storage areas should normally have water extinguishers. Mechanical rooms should have Dry Chemical or CO_2 extinguishers.

N.B. Water extinguishers should never be used on oil or grease fires, as they will merely spread the fire. Water extinguishers must never be used on electrical fires – the user could be electrocuted.

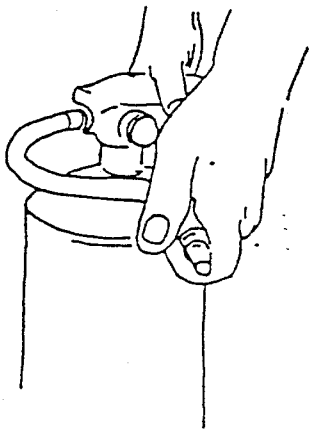
1. Determine the type of fire.
2. Select the right extinguisher.
3. Take the extinguisher off the stand and carry it to the fire.



4. Pull the safety pin

5. <u>Aim the nozzle at the base of the fire</u> and squeeze the hand lever. A wider spray can be obtained from a water pressure or soda-acid extinguisher by putting your thumb partly over the nozzle.

   <u>Make sure the spray is aimed at the base of the fire.</u> While the flames may be spectacular, spraying them will not put out the fire.



6. <u>Work around the fire,</u> as though trying to corner it. Cover as much of the base as possible.

7. Work quickly – extinguishers empty fast.

Type of Fire Extinguisher	Time to discharge
2 ½ Gallon Water Pressure Type	58 seconds
2 ½ Gallon Soda Acid Type	60 seconds
10 lb. ABC Dry Chemical	10 to 16 seconds
10 lb. CO_2	25 seconds

Use a fire hose when the fire is getting too big for a few extinguishers. It is particularly important to think of using the fire hose in areas which do not have sprinkler systems. The fast and efficient use of the fire hose can mean the saving of tens of thousands of dollars of damage before the Fire Department arrives.

There are three things to know ahead of time. First, know the exact location of the hose. Second, determine whether or not the hose has a modern nozzle control. Finally, know who is going to operate the hose, keeping in mind that it is easier with two people.

One Person Operation

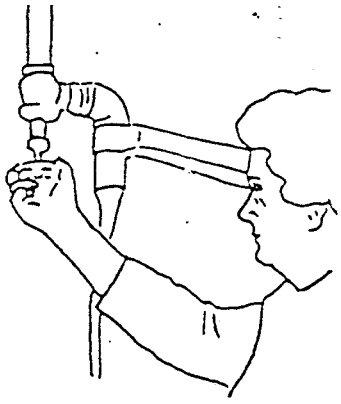
1. Pull the hose completely out of the rack before you turn the water on. If you do not pull it out first, the water under pressure may jam the hose in the rack.

2. Turn on the water, by turning the valve at the rack. If the hose has a modern nozzle control, you have to control the flow of water as you would a garden hose.

3. Go to the fire carrying the hose over your shoulder. This is the easiest way to drag a hose full of water under pressure.

4. Turn on the nozzle control, if it is not already open, to let the water out.

5. Aim the spray at the base of the fire.



MEMORANDUM TO FLOOR WARDENS

DUTIES AND RESPONSIBILITES OF FLOOR WARDENS

The Floor Warden will assume charge in his/her area in the event of an emergency arising in the building. As he will be responsible for the safety of the persons under his/her control, he/she is to familiarize him/herself with the following procedures which are designed to provide an efficient and safe means of evacuation should the need arise.

(1) In the event of an emergency the Warden, or his/her Deputy, will take charge and the Floor Wardens will immediately come under his/her direction.

(2) It is vital that every person on the floor knows who the Floor Warden is and where he/she is located. The same applies to the Floor Warden's Deputies and the Monitor's. This information is to be displayed at different locations in your area.

(3) The Floor Warden will appoint Exit Guards to supervise exit doors and monitors, who will assist him/her in the orderly assembly of staff before evacuations. Each Floor Warden will appoint searchers as necessary to check washrooms, private offices, storage rooms and other out-of-the-way spots to ensure that no one is left in the area.

(4) The duties of the Floor Warden will fall into two main categories:

a. Fire Occurring in Warden's Area of Responsibility

1. The Floor Warden should immediately notify the Warden who in turn is to immediately telephone the Fire Department.

2. If the blaze is considered serious, the Floor Warden will supervise evacuation of the personnel from the building.

3. If the fire is of a minor nature, it may be attacked in order to extinguish the blaze.

SA300.2
EMERGENCY RESPONSE

The following instructions are issued as guidelines in the event of any incident involving Dangerous Goods being handled by Direct General Partner Corporation ("Direct") employees.

Instructions should be reviewed with all Direct employees on a monthly basis, preferably at the end of regularly scheduled Safety Meetings.

> *A Dangerous Goods occurrence is described as being any incident, release or discharge from any truck, trailer or container of a Dangerous Good, whether the result of an accident or not, or damage to a truck, trailer or container containing or having contained a Dangerous Good.*
>
> *Any mishap causing damage to a truck, trailer or container containing or having contained a Dangerous Good, regardless if release or discharge of Dangerous Good is evident, is classified as a reportable occurrence.*

1. Should an incident occur involving Dangerous Goods, your first priority is your personal safety, that of other Direct employees, outside contractors, the general public and the Environment.

2. All incidents involving Dangerous Goods must be brought to the attention of the on-duty Direct Dispatcher, Division Manager or Supervisor IMMEDIATELY, whether the incident is an actual dangerous goods occurrence or a possible dangerous occurrence.

3. Supervisory staff MUST handle all incidents involving Dangerous Goods. Direct will notify:
   - The Provincial Environmental Branch.
   - The police, if necessary.
   - The consignor
   - The consignee
   - The Emergency Response number so indicated.

4. **Do no put yourself or others in a dangerous position.** Upon observing a discharge or spill, or where damages have occurred to a unit containing Dangerous Goods, MOVE AWAY, keeping upwind of the incident.

5. Keep all open flames, cigarettes and pipes away from the incident scene.

6. Stay away from the damaged equipment containing Dangerous Goods.

7. Stay away from any spilled Dangerous Goods.

8. Stay away from any odour, vapour or gas clouds that may be present.

9. Ensure all pedestrian/vehicular traffic is kept clear of the incident scene. Do not allow movement of any kind through the contaminated area(s) until appropriate personnel have arrived.

10. A Dangerous Good unit involved is NOT to be moved or unloaded from any vehicle until instructed to by the appropriate authority (the Environmental Branch, the police, Dangerous Goods inspector, CANUTEC – phone (613) 996-6666) that it is safe to do so.

11. Any accident, release or discharge of any truck, trailer or container containing Dangerous Goods, regardless of quantity released, discharged or resultant damages, is subject to notification of the appropriate Direct personnel and government authorities.

12. Should emergency action b required as a result of personal injury, fire and/or explosion, immediately take the following actions:

    a. DON'T PANIC; STAY CALM

    b. In the event of fire/explosion or vapour cloud, move upwind and evacuate to a safe distance. Follow evacuation procedures as outlined in items 8-15.

    c. Contact local Fire/Ambulance services.

    d. Contact the appropriate Direct Supervisors.

13. The Driver/Warehouse worker involved must make a detailed report of any such occurrence to Direct within twenty-four (24) hours.

14. Employees requiring further information on Dangerous Goods Regulations are to consult with their immediate Supervisor.

POLICY
BULLETIN

Division: All Divisions

Subject: Safety SA300 Dangerous Goods

SA300.2

Emergency Response

The following instructions are issued as guidelines in the event of any incident involving Dangerous Goods being handled by Direct General Partner Corporation ("Direct") employees.

Instructions should be reviewed with all Direct employees on a monthly basis, preferably at the end of the regularly schedule Safety Meetings.

> *A Dangerous Goods occurrence is described as being any incident, release or Discharge from any truck, trailer or container of a Dangerous Good, whether The result of an accident or not, or damage to a truck, trailer or container Containing or having contained a Dangerous Good.*
> *Any mishap causing damage to a truck, trailer or container containing or having Contained a Dangerous Good, regardless if release or discharge of Dangerous Good is evident, is classed as a reportable occurrence*.

1. Should an incident occur involving Dangerous Goods, your first priority is your personal safety, that of other Direct employees, outside contractors, the general public and the environment.

2. All incidents involving Dangerous Goods must be brought to the attention of the on-duty Direct dispatcher, Division Manager or Supervisor IMMEDIATELY, whether the incident is an actual dangerous occurrence or a possible dangerous occurrence.

3. All incidents involving Dangerous Goods MUST be handled by Supervisory; staff.
Direct will notify

- The Provincial Environmental Branch
- The police, if necessary
- The consignor
- The consignee
- The Emergency Response number so indicated

4. **Do not put yourself or others in a dangerous position.** Upon observing a discharge or spill, or where damages have occurred to a unit containing Dangerous Goods, MOVE AWAY, keeping upwind of the incident.

5. Keep all open flames, cigarettes and pipes away from the scene.

6. Stay away from the damaged equipment containing Dangerous Goods.

7. Stay away from any spilled Dangerous Goods.

8. Stay away from any odor, vapor or gas clouds, which may be present.

9. Ensure all pedestrian / vehicular traffic is kept clear of the incident scene. Do not allow movements of any kind through the contaminated area(s) until appropriate personnel have arrived.

10. A Dangerous Goods unit involved is NOT to be moved or unloaded from any vehicle until instructed to do so by the appropriate authority (the Environmental Branch, the police, Dangerous Goods inspector, CANUTEC – phone (613) 996-6666) that is safe to do so.

11. Any accident, release or discharge of any truck, trailer or container containing Dangerous Goods, regardless of quantity released, discharged or resultant damages, is subject to notification of the appropriate Direct personnel and government authorities.

12. Should emergency action be required as a result of personal injury, fire and/or explosion, immediately take the following actions:

a) DON'T PANIC, STAY CALM

b) In the event of fire/explosion or vapor cloud, move upwind and evacuate to a safe distance. Follow evacuation procedures outlined in items 8-15.

c) Contact local Fire / Ambulance services

d) Contact the appropriate Direct Supervisors.

13. The Driver/ Warehouse worker involved must make a detailed report of any such occurrence to Direct within 24 hours.

14. Employees requiring further information on Dangerous Goods Regulations are to consult with their immediate Supervisor.

SAFETY PRECAUTIONS FOR WAREHOUSES

The following states the Direct General Partner Corporation ("Direct") regulations for safe practices, conditions, and procedures, for the prevention of industrial accidents within any of our warehouses. These regulations should be read and signed by each employee as recognition of understanding of the regulations. A copy must be posted in a prominent location in each warehouse so as to be seen and reviewed by everyone in our employ.

REGULATIONS:

- No person in the warehouse will misuse, or without reasonable cause, remove or interfere with anything provided for securing the safety or welfare of any person in or about the warehouse.

- Defective guards, railings, hand and power tools, machinery, or any mechanical or physical condition that my cause an accident should be brought to the attention of management immediately for corrective action or if it can be immediately corrected by the employee, so it should be done.

- No person in the warehouse will engage in any contest, feat or strength, unnecessary running, rough or boisterous conduct that is likely to endanger the safety of any other person.

- No person whose faculties are impaired by alcohol or illegal drugs, or has in his/her possession any alcohol, or illegal drugs, will be permitted to enter or remain in the warehouse area or property that is so designated by Direct.

- No person who, to his/her knowledge, is affected with a communicable disease will enter or remain in the warehouse area unless in possession of the appropriate personal safety apparel required to prevent the transmission or contamination of said communicable disease.

- No person will be required to lift, carry, or move anything so heavy, or in such a manner, that they would be likely to endanger his/her safety or the safety of any other person in the immediate area.

- Any person required to climb any object above floor level will climb down again – not jump, so as to endanger his/her or anyone else's safety.

- No person will fail to use the proper equipment that is required in a safe and appropriate manner for the job that he/she is performing.

DANGEROUS PLACES:

- Every opening, place, or thing, that is likely to be a source of danger to any person, will be securely fastened, covered, or blocked off from access.

- No person will work on ore near any bulky material that is piled or disposed in such a manner as to endanger the safety of that person or fellow workers.

DANGEROUS MATERIAL:

- Any dangerous, flammable, or explosive material, substance, or thing, that is kept for immediate use, will be stored:

  - In approved containers.
  - In clearly marked areas selected to minimize personal injury or building damage.
  - In such a manner as to possess adequate safe guards against accidental spills, damage to containers, or misuse.

Any dangerous, flammable, explosive material, substance, or thing that is kept for a purpose other than immediate use will be kept or stored:

  - Outside of the building.
  - In an area not used for any other purpose.

– or –

  - In a fire resistant compartment satisfactory to the area Fire Department as to location and construction.

- Gasoline will not be used as a cleaning agent in any manner.

- Any person, whose clothing becomes soaked with gasoline or kerosene, will remove the clothing immediately.

- Varsol; or any other flammable, toxic, or caustic substance shall not be used to clean equipment, machines, or tools. (Water-soluble products are available at comparable and cheaper prices.)

VENTILATION AND DUST CONTROL

- Any place where dust may accumulate will regularly be cleaned by a satisfactory method for dust removal such as by vacuum, wet sweeping, wet shoveling, or any other method that will substantially reduce the dissemination of dust into the atmosphere.

SUBSTANCES DANGEROUS TO HEALTH:

- A medical officer will examine any person exposed to any substance that is likely to endanger his/her health. Such examination may include an X-ray exam and a blood test, or such other tests as may be directed by the examining physician.

MACHINERY:

- Clearances adequate for the safety of the persons in the warehouse or terminal will be maintained between any moving parts of any machine or any material being carried by said machines and any other machine, structure, or thing.

- Every prime mover, device, place, matter, or thing, or parts thereof, that is dangerous to the safety of any person will be safely fenced or guarded unless:

    - It's position, structure, or attachment ensures the same protection as if it were fenced safely or guarded,

    - Or -

    - A safety device is provided that automatically prevents the person operating said machinery from coming within any dangerous part.

- No person will clean, oil, adjust, repair, or perform maintenance work on any machinery or other such device, while that machine is in operation, specifically when such operation is likely to endanger the safety of any person, except when such maintenance work is not practical while the machine is stopped.

- No person will work between any machinery, objects, or other things that are of such a nature that they will likely move in a manner that is dangerous to that person's safety.

- No person will work where the accidental starting of a machine is likely to endanger the safety of any person unless effective precautions to prevent such accidental starting are taken, including the locking-out of control switches or control mechanisms, and satisfactory warning signs are posted in regards to same.

- No person will work without supervision at any machine, unless that person:

    - Has received adequate training and instruction in the operation of that machine and is totally conversant concerning any dangers that may arise from operation of that machine.

    - Has received adequate supervision by a person having thorough knowledge and experience with that particular machine.

    - and –

    - Is capable of safely operating the machine without supervision.

- The safe working load(s) limit of every lifting device will be clearly marked on each such lifting device.

- No forklift or similar lifting device will be loaded beyond its safe working load limit except for the purposes of a test, or when the load is certified as safe by the warehouse Supervisor.

- No accessorial equipment, lifting equipment, or any other type of lifting device, will be used unless it is of good condition, sound material, and adequate strength to safely support the maximum load to which it is likely to be lifting, and it is in a properly maintained condition.

- All material handling equipment will be thoroughly examined at minimum, semi-annually, by a certified inspection person. No newly acquired material handling equipment will be used until it has been thoroughly tested and examined by a certified inspection person.

- No material handling equipment will be moved when any person is in or under the path of that material handling equipment or its load, until the person is adequately warned of the proposed movement.

- Practical steps will be taken to prevent injury to the hearing of a person in the warehouse by excessive noise from equipment.

- All portable electrical tools used in the warehouses will be equipped with a three wire polarizing cap.

PERSONAL PROTECTIVE DEVICES AND CLOTHING:

- No person will work in any place where he/she is likely to be exposed to:

    - Head injuries, unless he/she is wearing a hat manufactured for the purpose of preventing such injury.

    - Eye injury from flying particles or like hazardous materials or substances, unless he/she is provided with the appropriate device manufactured for the purpose of preventing injury.

    - A Foot injury from falling, crashing objects, corrosive or sharp objects, or from wet locations, unless he/she is wearing footwear or other protective materials manufactured for the purpose of preventing such injury.

    - Injury from dangerous fumes, gases, or deficiency of oxygen, unless he/she is protected by wearing suitable breathing apparatus manufactured for the purpose of preventing such injury.

WAREHOUSE/TERMINAL FACILITIES:

- Terminals will be kept in a clean and sanitary condition, free from any substances arising from refuse of any kind. All accumulations of oil, grease, dirt, and refuse will be removed at minimum, daily, by a suitable method, from the floors or other work areas so far as is practical.

- In applications where compressed air is available within such facilities, it will not be used to dust off any personal clothing, work areas, or other personal items that may provide a dangerous situation.

- Applicable danger and caution signs will be posted, as required, to warn personnel of specific and impending dangers.

- All passageways and other walking surfaces will be kept in a safe condition and free from obstruction and accumulation of ice and/or snow. No finish or protective material will be used that is likely to make the walking surface slippery under any conditions.

- Washrooms will be adequately lit and kept in good repair, and in a sanitary condition.

- Adequate means will be provided for the proper draining of the floors that may become wet, to such an extent that the safety of persons operating within that area is not likely to be put in jeopardy.

BUILDING MAINTENANCE:

- The building will be kept properly lit, heated, and ventilated, and any repairs required to keep the building in a safe and inhabitable condition will be reported immediately to the building Supervisor. In cases or warehouses or unheated facilities, the appropriate attention will be paid to ensure that these areas are properly maintained so as to be in a safe condition similar to that of any other building.

HOUSEKEEPING:

- All items such as coveralls, rags, scrap metal, and any substances likely to cause an accident or endangerment, will be stored in approved containers or designated areas within the buildings.

- Work areas will be kept uncluttered. Any obstruction will be removed or conspicuously marked for all persons' attention.

- Building and emergency exits, circulation areas, and fire lanes will be kept clean and free of obstruction. All exits will be clearly identified with approved signage.