


Operating Procedure	
Document Title: Site Wide Spill Procedure	Document Number: ENV-SOP-0001
Owner: Environmental Manager	

Review Coding	
<input type="checkbox"/>	Code 1 – Reviewed with No Comments
<input type="checkbox"/>	Code 2 – Reviewed with Minor Comments
<input type="checkbox"/>	Code 3 – Reviewed with Major Comments
<input type="checkbox"/>	Code 4 – Not Accepted
<input type="checkbox"/>	Code 5 – Information Only

Rev	Rev Date	Issued For	Prepared By	Reviewed By	Approved By
A	Oct 26 th , 2017	Review	Carolyn Winik	Darrell Martindale	
1	Jan 31 st , 2018	Approval	Carolyn Winik	Sylvie St. Jean	
2	February 12 th , 2018	Approval	Jono Irwin	Sylvie St Jean	<Original signed by>

		ENV-SOP-0001 Site Wide Spill Reporting and Response	
		Owner: Environmental Specialist	Approver: Manager Environment
		Review Frequency: 3 Years	Effective Date: January 31, 2018

1. Purpose

The purpose of this procedure is to document the response when a pollutant is released into the environment on the Rainy River Mine Site.

This procedure is designed to be consistent with Federal and Provincial Reporting Regulations, Corporate Standards for spill reporting (EMS Standard 008.01) and is aligned with all stakeholder commitments of the New Gold Rainy River Mine.

2. Scope

The procedure is an outline of the spill response and reporting responsibilities for anyone working on the Project Site.

Regulatory spill reporting requirements is a function of the Environmental Department and is detailed further in ENV-SOP-0002.

3. Definitions

Spill

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

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

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

Spill Volume

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

Spill Kit

Spill kits are located in every vehicle on site as well as in parking lots, laydown areas and beside pumping and other fueled equipment. The Spill Kit contains absorbent pads to contain spilt liquids as well as other helpful items.

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Responsibilities and Accountabilities

Rainy River Manager Environment

- Approves this policy and ensures its communication to site personnel and takes appropriate measures to ensure site wide compliance
- Oversees the Environmental Department to support the implementation of this procedure and provide support as detailed in ENV-SOP-0002 Environmental Department Spill Reporting
- Ongoing monitoring of spills to identify trends and implement mitigation techniques

Environmental Department

- Ensures that this procedure is understood by everyone who works at the Rainy River Mine
- Provide support and instruction on reporting and spill clean-up including sampling where necessary as further detailed in ENV-SOP-0002
- Support the root cause analysis process and incident investigations
- Report spills externally to regulatory bodies and community stakeholders as required
- Moderate environmental incidents within Incontrol

Health and Safety Department

- Assign INControl task to Environmental Department for follow up after Spill Report is received via RainyRiver.Incident@newgold.com

Department Managers

- Support the procedure and ensure departmental staff follow its expectations
- Ensure departmental Supervisors are trained to lead the spill response within their crews
- Support any follow up investigations as required

Supervisors (of the crew reporting the spill)

- Ensure spills are reported consistent with this procedure based on size of spill and location
- Ensure spills are cleaned up properly and contaminated waste management disposed of appropriately, with records of disposal included with the Spill Report
- Maintain spill kits and ensure they are restocked after any products are used
- Ensure any contaminated material is sent to a location approved for this purpose by the Environmental Department and quantities are reported to the Environmental Department
- Lead follow up investigations
- Ensure their departments receive the required training, tools etc to comply with this policy

All New Gold Employees and Contractors

- Report all spills and respond appropriately, consistent with spill response requirements

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4. Guidelines & Instructions

Spills that pose an immediate threat to human life/health and sustained and ongoing threat to the environment (e.g., bulk fuels, sediment dam breach, truck roll over):

- Initiate Rainy River Emergency Preparedness and Response Plan through site radios and indicate environmental emergency.
 - The Environment On-Call (Environment Manager or designate) will be contacted immediately.

4.1 Spill Response

- STOP THE WORK: When a spill is initially discovered all work should cease immediately if safe to do so, once any safety factors have been reduced, work should stop until the source of the spill is rectified
- STOP THE FLOW: Once the work has stopped, the source of the spill should be identified and safely stopped as soon as possible.
- STOP THE SPREAD: The spill should be contained from spreading as safety allows. A spill kit, spill tray or any other appropriate materials as identified by the supervisor should be used to contain the spill from spreading.
 - Especially for spills which are a liquid, the flow should be diverted away from any nearby water courses
- COMMUNICATE: All spills must be reported to the area supervisor as soon as possible.
- Supervisors are to provide support and aid in the immediate spill response and then identify if the spill is externally reportable. **(See Table 1)**
 - For non-externally reportable spills, the spill should be documented and cleaned up
 - Removal of contaminated material to approved containment as identified by the Environmental Department
 - Repairs and cleaning of any equipment or structural failure
 - Post incident reporting

4.2 Externally Reportable Spills

Additional requirements for spills exceeding mandatory reporting thresholds (Table 1) and for spills on third party property within the project site MUST be reported as soon as possible to the Environmental Department who are responsible for ALL external spill reporting.

- During day shift, Supervisor to contact site Environment Team via site radio or on call phone
- In the event the spill is outside 0700hrs to 1730hrs the initial contact should be directed to: Environmental On-Call 1-807-632-6152 (Environment Manager or designate)

4.3 Post Incident Reporting

All spill reporting must follow Site Spill Response Flow Chart (See Appendix 1):

- All spills are to be documented using the Spill Reporting Form (Appendix 2) by the person first observing the spill or their supervisor or designate familiar with the spill within the timelines set out in this procedure, consistent with site HSE reporting and communication.
- The Spill Reporting Form can be found on the Environment Department webpage.
- The detailed Spill Report is to be copied to the following emails: RainyRiver.Enviro@newgold.com and RainyRiver.Incident@newgold.com
- For New Gold Departments only, the incident details are to be entered into InControl software by the supervisor or designate as soon as possible and before shift end.

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

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5. Documentation

The Spill Report Form will be used as the investigation report. The report must be completed prior to the end of shift.

Photos of the scene including clean up, any witness statements, maintenance records, and contaminated material removal evidence should be included with the spill report where appropriate.

The Supervisor or Area Manager for that area of works is responsible for ensuring its completion prior to the end of shift.

The detailed Spill Report to be copied to the following emails: RainyRiver.Enviro@newgold.com and RainyRiver.Incident@newgold.com

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

All records must be maintained for 5 years in New Gold's incident reporting system, InControl. Follow up investigations may be required.

6. Reference Table

EMS Standard 008.01 and 002.06_Corporate ESR Incident Reporting Guidelines:

- <https://intranet.newgold.com/hses/SitePages/EMStd.aspx>

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

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

Emergency Preparedness and Response Plan

- <https://yag.intranet.newgold.com/hses1/Emergency%20Preparedness%20and%20Response%20Plan/Forms/AllItems.aspx>

8. Appendix

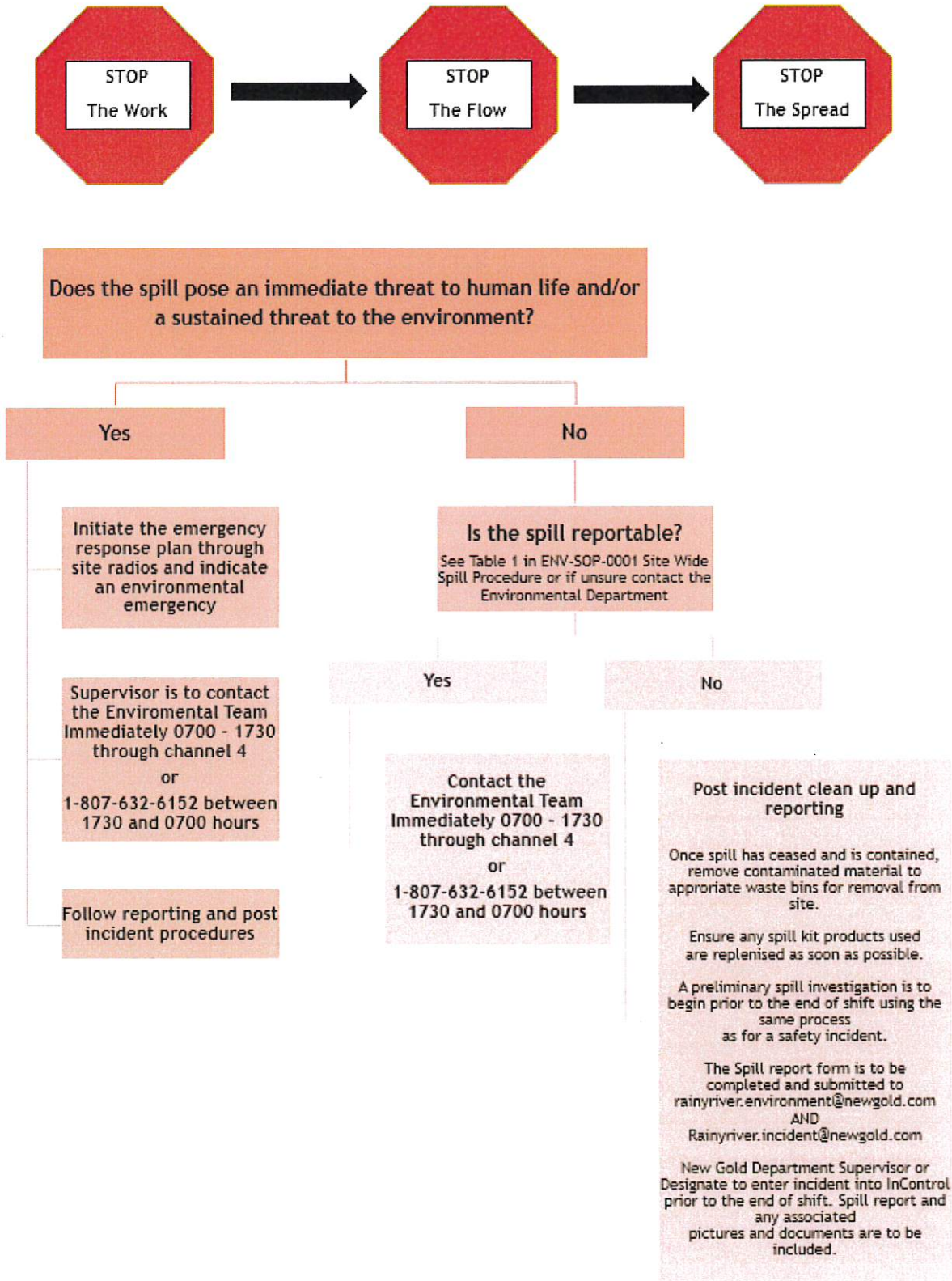
Appendix 1: Site Spill Response Flow Chart

Appendix 2: Spill Reporting Form

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Appendix 1: Site Spill Response Flow Chart



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Appendix 2: Spill Reporting Form



SPILL REPORTING FORM

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

REPORT ALL SPILLS IMMEDIATELY TO CREW SUPERVISOR

CREW SUPERVISOR TO ASSESS REPORTING REQUIREMENTS CONSISTENT WITH SPILL REPORTING PROCEDURE

CONTACT NEWGOLD ENVIRONMENT IMMEDIATELY IF SPILL IS EXTERNALLY REPORTABLE

1-807-632-6152

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

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