


Operating Procedure	
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Owner: Environmental Manager	

Review Coding	
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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-0002 Environmental Department Spill Reporting Procedure	
		Owner: Senior Environmental Specialist	Approver: Manager Environment
		Review Frequency: 1 Year	Effective Date: February 1st, 2018

1. Purpose

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

2. Scope

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

3. Definitions

Spill

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

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

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

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

Project Site

The Project Site is defined as;

- All project components plus approximately 100 m zone;
- Highway 600 from Hwy 71 to Seven Bends;
- Teeple Road from Hwy 71 to Hwy 600;
- Municipal roads used for access including but not limited to Teeple Road, Roen Road, Korpi Road and Eluik Road; or
- As designated by the Construction Director as the Project progresses.

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4. Responsibilities and Accountabilities

Rainy River Manager Environment

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

Environmental Department

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

Department and Area Managers

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

Supervisors (of the crew reporting the spill)

- Ensure that the spill incident procedure is managed effectively and limits impact to the environment as much as possible
- Report all spills consistent with ENV-SOP-0001 and determine if spills are externally reportable
- Lead any follow up investigations

Employees and Contractors

- Report all spills and respond appropriately, consistent with spill response requirements as detailed further in ENV-SOP-0001

5. 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 Emergency Response Plan through site radios and indicate Environmental emergency
 - The Environment On-Call (Environment Manager or designate) will be contacted immediately.

5.1 Spill Response

- The Environmental Department will be called as soon as possible following an Externally Reportable Spill as outlined in ENV-SOP-0001
 - via radio Channel 4 or phone 1-807-632-6152
- The main function of the Environmental Department during the initial spill response is to provide immediate assistance to site personnel in relation to the containment of the spill and remedial actions necessary

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5.2 Regulatory Reporting

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

- Environmental Manager or designate to follow "Environmental Reportable Incident Call List" Appendix 3.
- The Manager or designate will contact the Spills Action Center at 1-800-268-6060 and report:
 - your name and phone number
 - name and phone number of the person or company in control of the product spilled
 - date, time and location of the spill
 - duration of the spill (if known) and whether the spill is ongoing
 - type and quantity of pollutant spilled, including hazard level or toxicity information
 - source of the spill and information on the cause
 - description of adverse effects
 - environmental conditions that affect the spill (weather, traffic, etc.)
 - actions being taken to respond
 - other agencies and parties responding
- A follow-up report detailing the incident must be submitted via a transmittal to regulatory bodies within the time frames detailed below. The report must include:
 - The measures that were taken to mitigate the effects of the occurrence;
 - If an emergency response plan was implemented, details concerning its implementation; and
 - Changes made to avoid a subsequent occurrence of the accident or malfunction.
 - MOECC within 7 days of incident.
 - MNRF within 7 days of incident, if TSS or Fisheries related.
 - DFO within 30 days of incident.
 - ECCC within 30 days of incident, Adam Scheepers and Dan McDonell.
 - CEAA within 30 days of incident.
- New Gold Environmental Department will update the spill incident in InControl consistent with O.Reg 675/98 when Spill Report Form is received.
 - Classify incidents according to the NG Risk Consequence categories (Level 1, 2 or 3) as per 008.04 Incident Assessment and Response Matrix

5.3 Follow up Investigation

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

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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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Table 2: Exemptions for spill reporting on Highways

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

6. Documentation

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

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

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

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

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

EnvironmentCanada (EC) – Within 30 Days

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

Canadian Environmental Assessment Agency (CEAA) – Within 30 Days

Every quarter the Environmental Department will review all spills on site and conduct Spill Audits on 10% of reported spills as per ENV-SOP-0006

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

7. Reference Table

Ontario Pollution and Spills Reporting

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

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

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

002.06_CORPORATE ESR INCIDENT REPORTING GUIDELINES

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8. Appendix

Appendix 1: Environmental Department Spill Response Flow Chart

Appendix 2: Spill Reporting Form

Appendix 3: Environmental Reportable Call List

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Appendix 1: Environmental Department Spill Response Flow Chart



ENVIRONMENTAL DEPT. SPILL RESPONSE

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



Is spill externally reportable?

Is the spill...

- A hydrocarbon over 100 L?
- Sediment release causing TSS greater than 30mg/L?
- Spilled substance into a water body (i.e. a stream, pond, swamp)?
- On third party property?
- A gas (SO2) release of 10+ minutes?
- An explosive spill over 25 kg?
- A flammable liquid over 200 L?
- A refrigerant over 100 kg?

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



YES

Follow Environmental Reportable Incident Call List Attachment 3



- Draft Spill Report Letter (follow previous letter templates)
- Have letter reviewed by Enviro team member and Environmental Manager or designate

- Email letter to Matt Hoffmeister (MOECC) within 7 days matt.hoffmeister@ontario.ca
- If TSS/Fisheries related, email letter to Karli Allen (MNRF) within 7 days karli.allen@ontario.ca
- Email letter to Andrea Doherty (DFO) within 30 days andrea.doherty@dfo-mpo.gc.ca
- Email letter to Adam Scheepers and Dan McDonell (ECCC) within 30 days adam.scheepers@canada.ca and dan.mcdonell@canada.ca
- Email letter to CEAA within 30 days compliance.conformite@ceaa-



October 26, 2017

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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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Appendix 3: Environmental Reportable Call List

Environmental Reportable Call List

Person Reporting: _____

Date: _____

Time: _____

Contact Group:	
Regulatory Point of Contact: Greg Bowkett C- 807-456-3668	Yes _____ No _____
Environmental Manager, Sylvie St. Jean C- 807-707-3497 Enviro Manager will contact Corporate Office if required	Yes _____ No _____
Community Relations Manager, Stacey Jack C- 807-456-3780 Call and email stacey.jack@newgold.com	Yes _____ No _____
If Stacey is not available, contact Alyson Bisson at C-807-708-3844 alyson.bisson@newgold.com <i>Community Dept will notify Chapple and designated Communities.</i>	
Area Manager of Location of Spill Manager Contacted: _____	Yes _____ No _____
Corporate CSR Director, Dennis Wilson Contact via email dennis.wilson@newgold.com Corporate VP Operations, Cory Ativeh Contact via email cory.ativeh@newgold.com	
Spills Action Center (SAC) 1-800-268-6060 (Within 24 hours of spill/exceedance)	Yes _____ No _____
SAC Reference # _____	
Matt Hoffmeister (MOECC) 1-807-468-2703	Yes _____ No _____
Only call if necessary:	
Adam Scheepers (EC) 1-613-990-9744	Yes _____ No _____
Department of Fisheries and Oceans (DFO) Fisheries Protection 1-855-852-8320	Yes _____ No _____
CANUTEC (TDG) 1-613-996-6666	Yes _____ No _____
Canadian Nuclear Safety Commission 1-613-995-0479	Yes _____ No _____
Company Information: New Gold, Rainy River Project 24 Marr Road Barwick, Ontario POW 1A0 Rainy River District	
* Use the information from the Spill or Exceedance Reporting Form	

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