



PROCEDURE

PROCEDURE NO: 215•1

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TITLE: Environmental Incident Response

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POLICY: 215, Environment Responsibilities

REVISION DATE: May 5, 2021

SECTION: Community Services

RESPONSIBLE

DEPARTMENT: Energy Management and Environmental Stewardship

Section 110 of the Government of Alberta's Environmental Protection and Enhancement Act (EPEA) states that an employee of a local authority has a duty to report a release (spill) into the environment that may cause, is causing or has caused an adverse effect. Depending on the quantity and the condition of the release, the employee may be required to report the incident to Alberta Environment and Parks (AEP).

Section 60 of the Municipal Government Act (MGA) states that a municipality has the direction, control and management of the rivers, streams, watercourses, lakes and other natural bodies of water within the municipality, including the air space above and the ground below. Therefore, it is the municipality's responsibility to mitigate risks to these areas within their jurisdiction.

The purpose of this Procedure is to ensure that environmental incidents are handled in a safe manner and properly reported to mitigate risk to the public, risk to the environment, and liability to the organization. This Procedure applies to all employees who discover a spill or other environmental incident and initially respond to the complaint.

Response Overview

Spills may be reported internally or from a call from the public to either 911 or the Customer Contact Centre (780-538-0300). It is the responsibility of the city employee receiving the initial notification of the spill to initiate the response process as mapped (Attachment "A"). Depending on the severity of the spill, City departments including Fire, Enforcement, Transportation, or Environmental Services may be deployed to the location of the spill. In all cases, a City employee will attend the scene.

It is the responsibility of the first City employee on scene or who receives the complaint to initiate and complete the Environmental Response Tracking Form (Attachment "B") and determine if the release is reportable to AEP via the quantities in the Release Reporting Guidelines (Attachment "C").

If the release is determined to be reportable, it is the responsibility of the first City employee on scene to complete the Environmental Response Tracking Form (Attachment "B") and report the release by calling 1-800-222-6514. All completed forms must be sent to the Environmental Services (ES) department via environment@cityofgp.com immediately following the call with AEP.

Monitoring, Clean-up and Disposal

Section 112 of the EPEA states that the person responsible for the released substance must take all reasonable measures to:

- a) Repair, remedy and confine the effects of the substance;
- b) Remediate, manage, remove or otherwise dispose of the substance in a manner to prevent an adverse effect or further adverse effects; and
- c) Restore the environment to a condition satisfactory to the Director of AEP.

If the responsible person is identified, it is their obligation to adhere to the requirements listed above. However, it is the municipality's responsibility to adhere to the list above when the responsible person is not identified as per Section 60 of the MGA. The municipality must adhere to the Section 112 of the EPEA until the person responsible is identified.

Clean-up requirements will be dependent on the location of the spill and the volume of the substance released. This may require daily sampling and monitoring, which will be verified with the Environmental Protection Officer (EPO) who is responding on behalf of AEP. The ES department will lead this process and an external environmental emergency response consultant may be retained if the scale of the spill is beyond City resources.

Spill response supplies will be maintained by the Fire Department and Transportation Services. Supplies include absorbent pads, absorbent socks, and granular absorbent. The Fire Department maintains supplies on fire engines with additional equipment and supplies on the hazmat unit at the Salmond Fire Hall (11906 - 102 Street). Transportation Services also maintains supplies including compact spill kits for smaller incidents at the City Service Centre (9505 - 112 Street). Supplies at the Service Centre are available to all City staff and can be accessed via Transportation Services (after-hours call 780-876-2721).

If the substance released is deemed hazardous it must be disposed of in an appropriate manner. Hazardous substances including soiled absorbent materials must not be disposed of in general garbage bins. Hazardous waste bins are available in the yard at the City Service Centre to dispose of such material. If the bins are at capacity please advise Transportation Services immediately (780-876-2721). Large quantities of hazardous substances materials must be disposed of at an approved Class 1 landfill or equivalent facility.

Reporting

All spill incidents must be tracked internally using the Environmental Response Tracking Form (Attachment "B"). It is the responsibility of the first City employee on scene to fill out and submit this form to environment@cityofgp.com before the end of the shift.

Depending on the nature of the event, the spill may need to be reported to AEP (1-800-222-6514). If any of the following criteria are met, report the incident to AEP as soon as is practicable and contact the City Environmental Technologist (780-876-7014):

- a) The substance released into the environment may cause, is causing or has caused an adverse effect;
- b) The substance released exceeds the Release Reporting Guidelines (Attachment “C”);
- c) The substance released has entered any water body or watercourse (including the City’s stormwater management system); and
- d) The first City employee on scene has any doubts of whether the spill should be reported.

It is advisable to complete the Environmental Response Tracking Form (Attachment “B”) prior to calling AEP as this form includes information that will be asked during the call with AEP:

- e) The location and time of release;
- f) A description of the circumstances leading to the release;
- g) The type and quantity of substance released;
- h) A description of any action taken and proposed to be taken at the site; and
- i) A description of the location of the release and the immediate surroundings.

AEP will issue a reference number for the spill which must be recorded on the Environmental Response Tracking Form (Attachment “B”) by the City employee on the phone call with AEP. Depending on the severity of the spill, as determined by AEP, an Environmental Protection Officer (EPO) may be deployed to the scene. All follow-up on the incident will be completed by the Environmental Technologist.

A reportable spill will require a site response plan that will include sampling to determine the substance and to provide confirmatory data that the mitigation efforts have been successful. The ES department will lead this process. Any quantity of a hydrocarbon that may enter into a body of water or the storm system is deemed reportable. When in doubt report!

If it is a prolonged clean-up, daily updates and a seven (7) day report must be provided to AEP. ES is responsible for the daily updates and the seven (7) day report. No employee outside of ES will provide follow-up statements, updates, or information of any kind to outside agencies (including AEP or Environment Canada) without ES approval.

The seven (7) day report authored by ES must be submitted to the appropriate AEP Director within seven (7) days after the immediate report. This written report must include:

- a) The duration and time of the release;
- b) The location of the release;
- c) The duration of the release and the release rate;
- d) The concentration, total weight, quantity or amount released;
- e) A detailed description of the circumstances leading to the release;
- f) The steps or procedures which were taken to minimize, control or stop the release;
- g) The steps or procedures which will be taken to prevent similar releases in the future; and
- h) Any other information required by the Director.

Substances that are released according to an approval or code of practice do not have to be reported to AEP, however, any spills that occur and require clean-up must be recorded on the Environmental Response Tracking Form (Attachment “B”) and forwarded to the ES department via environment@cityofgp.com before the end of the shift.

A best practice for information on hazardous substances includes the use of an app available in IOS and Android that can assist in decision making. ERG 2020 (Environmental Resource Guide) - assists responders in making initial decisions upon arriving at the scene.

Documenting

Accurate documentation must be kept of the incident response in order to maintain proper and accurate records (due diligence) to decrease liability exposure and ensure adequate financial resources. Documentation must include:

- a) Pictures;
- b) Invoices;
- c) Field notes/site notes; and
- d) Time sheet coding.

A best practice for documentation includes the use of a camera app available in IOS and Android (ie. Theodolite, GPS Camera 55, Dioptra) - any augmented reality app that uses your phone camera and adds a layer of geographical information such as compass orientation, GPS position and date and time stamp. Failure to use these tools will result in further reporting to substantiate data and statements.

Training

Training for these procedures will be provided by the organization. If a department is hosting training that fits within this Procedure, they must include other departments who have a role in spill response mitigation. This will ensure consistent understanding of proper and adequate tactics and techniques.

Legal requirements

Any deviation from the above terms may result in loss of credibility for the organization as well as the potential for fines up to \$500,000.00, employees may also face fines up to \$50,000. Section 229 of the EPEA provides for a due diligence defence, if all reasonable steps were taken to prevent an offense. Should an employee not practice due diligence on behalf of the organization they may face disciplinary action that may include written warnings in the employee's file.

Definitions:

“Alberta Environment and Parks” means at the time of developing this Procedure the legislative authority is named Alberta Environment and Parks.

“Authority” means the department or work unit who has the authority for the infrastructure or the particular group of tasks or bundle of work.

“Employee” means all workers or volunteers for the City of Grande Prairie.

“Local Authority” means the corporation of the City of Grande Prairie.

“Organization” means the City of Grande Prairie.

“Substance Release” means the release of a substance in an amount or concentration that is in excess of regulations, a code of practice or an approval.

“Spill” means the term used to refer to a substance release which may include (but is not limited to) hazardous substances; a large quantity of potable water that has the opportunity to enter the storm system or a natural body of water; and large amounts of black smoke.

This Procedure is effective May 5, 2021 and will be reviewed at a minimum of annually and after any major environmental incident response.

A handwritten signature in blue ink, appearing to read 'Horacio Galanti', with a stylized flourish at the end.

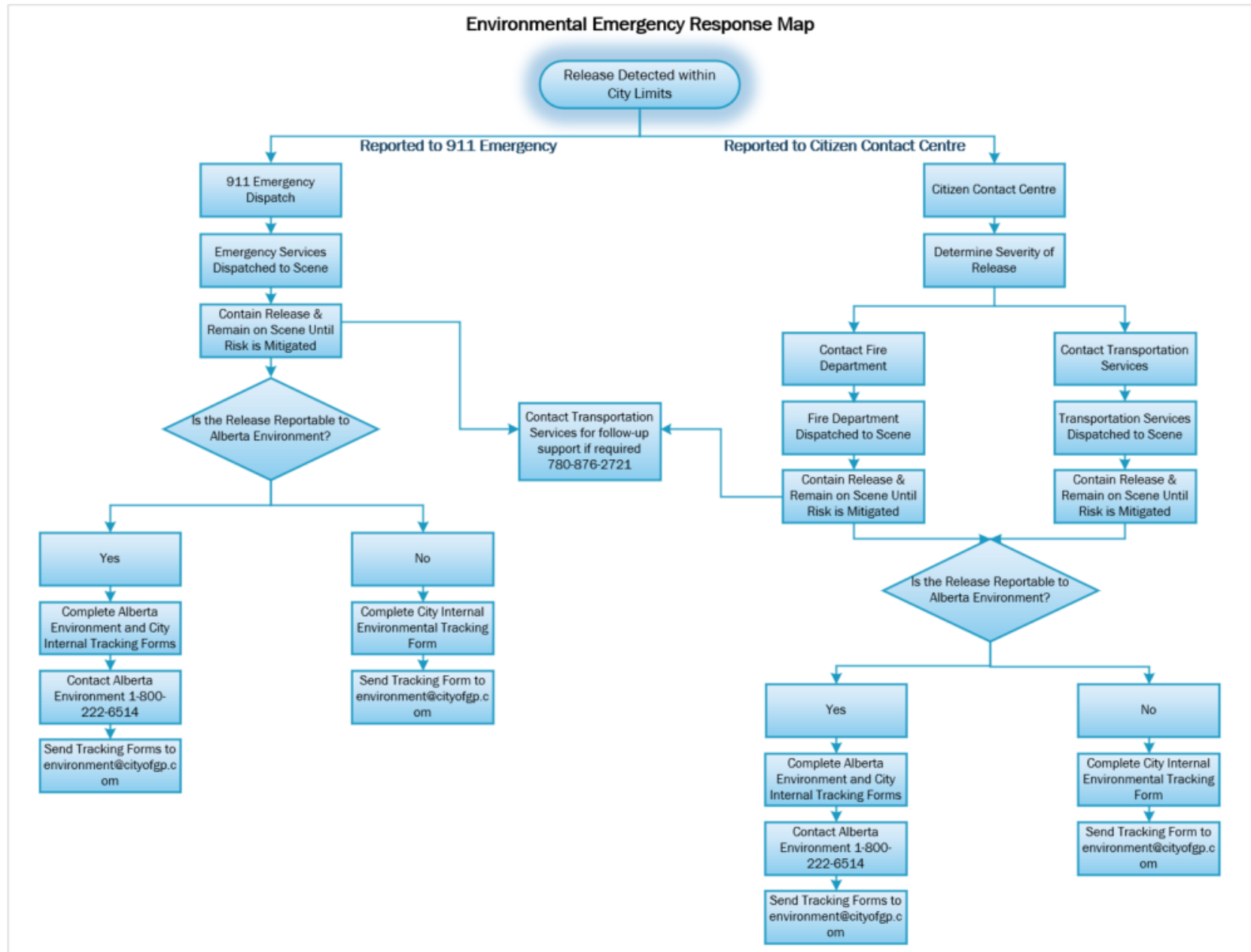
Horacio Galanti, P.Eng
City Manager

ATTACHMENTS

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ATTACHMENT "A"



ATTACHMENT “B”



Environmental Response Tracking Form

Upon completion, a copy of this form must be sent to environment@cityofgp.com

Clear Form

Save Form

Details

Incident Date	(DD/MM/YYYY)	Incident Time	
Reporting Date	(DD/MM/YYYY)	Reporting Time	
Complainant Name		Phone	

Spill / Release Issue Description

General location of release (Street address or neighbourhood) ☐ Storm System Impacted

Type & description of circumstance of release, if known (Please take pictures and attach them to your email) ☐ Pictures Taken

Approximate quantity / area covered of substance released, if known

Release Medium <input type="checkbox"/> Air <input type="checkbox"/> Asphalt or <input type="checkbox"/> Gravel <input type="checkbox"/> Soil <input type="checkbox"/> Water <input type="checkbox"/> Other/Unknown (Please describe)	Cause of Incident <input type="checkbox"/> Dumping <input type="checkbox"/> Transport Accident <input type="checkbox"/> Natural Causes <input type="checkbox"/> Operator Error <input type="checkbox"/> Equipment Failure <input type="checkbox"/> Other/Unknown (Please describe)	Type of Incident <input type="checkbox"/> Fixed Site <input type="checkbox"/> Continuous Release <input type="checkbox"/> Platform or Pipeline <input type="checkbox"/> Mobile Vehicle <input type="checkbox"/> Sheen on Water <input type="checkbox"/> Other/Unknown (Please describe)
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List immediate actions taken to stop / control / contain spill issue and describe results (Calls made, equipment used)

Other department contacts

ATTACHMENT “B”



Environmental Response Tracking Form

Upon completion, a copy of this form must be sent to environment@cityofgp.com

Clear Form

Save Form

Is the release into a water body?

☐ Yes

☐ No

Is the release reportable?

☐ Yes

☐ No

If yes to either of the above, fill in the fields below:

Report directly to Alberta Environment and Park (24 hours) 1-800-222-6514

Date Reported to AEP

Time Reported to AEP

Reference Number Issued to AEP

Notes From Conversation

Please immediately follow up with the City Environmental Technician at 780-876-7014

Responder (Person filling out form)
















Name

Phone

Position







ATTACHMENT “C”

Release Reporting Guidelines

Table Identified in Part 8.1 of the Transportation of Dangerous Goods Regulation				
Class#	Class Name	Class Image	Quantity	Emission Limit
1	Explosives		Any quantity that could pose a danger to public safety or 50 kg	
2	Gases	  	Any quantity that could pose a danger to public safety or any sustained release of 10 minutes or more	
3	Flammable Liquids		200 L	
4	Flammable Solids	  	25 kg	
5.1	Oxidizing Substances		50 kg or 50 L	
5.2	Organic Peroxides		1 kg or 1 L	
6.1	Toxic Substances		5 kg or 5 L	
6.2	Infections Substances		Any quantity that could pose a danger to public safety or 1 kg or 1 L	
7	Radioactive Materials		Any quantity that could pose a danger to public safety	An emission level greater than the emission level established in section 20 of the <i>Packaging and Transport of Nuclear Substances Regulations</i>
8	Corrosive Substances		5 kg or 5 L	
9	Miscellaneous Products		25 kg or 25 L	






ATTACHMENT “C”

Release Reporting Guidelines

Supplementary Information For Table Identified in Part 8.1 of the Transportation of Dangerous Goods Regulation					
Class #	Class Name	Class Image	Commonly Transported Substances		
1	Explosives		Air bag inflators Ammunition/cartridges Blasting caps / detonators Detonating cord Explosive charges (blasting, etc)	Fireworks/pyrotechnics Flares Fuse Igniters PETN / PETN compositions	Primers RDX / RDX compositions Rockets TNT / TNT compositions
2	Gases		Acetylene / Oxyacetylene Aerosols Carbon dioxide Compressed air Fertilizer ammoniating solution Fire extinguishers	Gas cartridges Helium / helium compounds Hydrocarbon gas-powered devices Hydrogen / hydrogen compounds Insecticide gases Lighters	Natural gas Nitrogen / nitrogen compounds Oil gas Oxygen / oxygen compounds Petroleum gases Refrigerant gases
3	Flammable Liquids		Acetone / acetone oils Adhesives Alcohols Aviation fuel Coal tar / coal tar distillates Diesel fuel	Gas oil Gasoline / Petrol Heating oil Kerosene Liquid bio-fuels Paints / lacquers / varnishes	Perfumery products Petroleum crude oil Petroleum distillates Resins Shale oil Tars
4	Flammable Solids		Activated carbon Alkali metals Aluminium phosphide Calcium carbide Camphor Carbon	Celluloid Cerium Copra Desensitized explosives Firelighters Matches	Metal powders Oily cotton waste Oily fabrics Seed cake Sodium batteries Sodium cells
5.1	Oxidizing Substances		Aluminium nitrate Ammonium dichromate Ammonium nitrate Ammonium nitrate fertilizers	Chlorates Hydrogen peroxide Lead nitrate Lithium hypochlorite Magnesium peroxide	Persulphates Potassium chlorate Potassium chlorate Potassium nitrate Potassium perchlorate
5.2	Organic Peroxides		Ammonium persulphate Calcium hypochlorite Calcium nitrate Calcium peroxide Chemical oxygen generators	Nitrates Nitrites Perchlorates Permanganates	Potassium permanganate Sodium nitrate Sodium persulphate

ATTACHMENT “C”

Release Reporting Guidelines

Supplementary Information For Table Identified in Part 8.1 of the Transportation of Dangerous Goods Regulation					
Class #	Class Name	Class Image	Commonly Transported Substances		
6.1	Toxic Substances		Acids Adiponitrile Alkaloids Allyls Ammonium metavanadate	Biological cultures / samples / specimens Carbamate pesticides Chloroform Clinical waste Cresols Cyanides Dichloromethane Dyes Hexachlorophene Lead compounds	Medical/Biomedical waste Medical cultures / samples / specimens Mercury compounds Motor fuel anti-knock mixture Nicotine / nicotine compounds Phenol Resorcinol Selenium compounds Tear gas substances Thiols/mercaptans
6.2	Infectious Substances		Antimony Arsenates Arsenics / arsenic compounds Arsenites Barium compounds Beryllium/ beryllium compounds		
7	Radioactive Materials		Americium radionuclides / isotopes Caesium radionuclides / isotopes Density gauges Depleted uranium / depleted uranium products Enriched Uranium	Iridium radionuclides / isotopes Medical isotopes Mixed fission products Plutonium radionuclides / isotopes Radioactive ores Radium radionuclides / isotopes	Surface contaminated objects Thorium radionuclides / isotopes Uranium hexafluoride Uranium radionuclides / isotopes Yellowcake
8	Corrosive Substances		Acids/acid solutions Alkylphenols Amines Batteries Battery fluid Bromine Chlorides Chlorosilanes Cyclohexylamine	Dyes Fire extinguisher charges Flux Formaldehyde Fuel cell cartridges Hydrochloric acid Hydrofluoric acid Hydrogen fluoride Iodine	Morpholine Nitric acid Paints Phenol / carboic acid Polyamines Polysulphides Sludge acid Sulfuric acid Sulphides
9	Miscellaneous Products		Air bag modules Ammonium nitrate fertilizers Battery powered equipment Battery powered vehicles Benzaldehyde Blue asbestos / crocidolite Castor bean plant products Chemical kits Dangerous goods in apparatus Dangerous goods in machinery	Dibromodifluoromethane Dry ice / cardice / solid carbon dioxide Expandable polymeric beads / polystyrene beads First aid kits Fuel cell engines Genetically modified micro-organisms Genetically modified organisms Internal combustion engines Life saving appliances	Lithium ion batteries Lithium metal batteries Magnetized material Plastics moulding compound Polychlorinated biphenyls Polychlorinated terphenyls Seatbelt pretensioners Vehicles