ENVIRONMENTAL ASSESSMENT REPORT

WASTE LEAD ACID BATTERY TRANSFER STATION

55 ROTHWELL ROAD
WINNIPEG, MANITOBA

Submitted to:

Direct LP
1115 Cardiff Boulevard
Mississauga, Ontario
L5S 1L8

Attention: Mr. Gordon R Karpf, National Customs Manager

Submitted by:

AMEC Environment & Infrastructure
A Division of AMEC Americas Limited
440 Dovercourt Drive
Winnipeg, Manitoba
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AMEC Project Number: WX17199

August 1 2013

EXECUTIVE SUMMARY

Direct LP authorized AMEC Environment & Infrastructure, a division of AMEC Americas Limited (AMEC) to complete an Environmental Assessment (ES) Report for the proposed waste lead acid battery transfer station to be located at 55 Rothwell Road in Winnipeg, 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 lead acid batteries under the Dangerous Goods Handling and Transportation (DGHT) Act.

Project Description and Existing Land Use

Direct LP is applying for a license for the proposed project site which would allow them to temporarily store and transfer lead acid batteries. 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 (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 (2) to three (3) trailers of waste lead acid batteries per week totalling approximately 55,000 kg.

The proposed project site is located along the south side of Rothwell Road in the Fort Garry North neighbourhood of the Lindenwoods Ward of the City of Winnipeg, Manitoba. The current owners of the proposed project site on which the proposed waste lead acid battery transfer station is to be developed is Direct Distribution. According to the City of Winnipeg Citizen's Information Service, the Site and adjacent properties are zoned for heavy manufacturing (M3).

The site is currently developed with a large commercial building divided into office spaces, a warehouse area and cross dock area. The surrounding land consists of manufacturing properties, commercial uses, and undeveloped grassed land, 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 partially disturbed by existing commercial facilities and the presence of surrounding commercial 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 lead acid battery transfer station will not affect the drainage ditches.

There are no waterbodies, 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 and a rail spur leading onto the Site are located on the east side of the proposed property. The nearest residential area is located approximately 250 metres on the east side of the project site. The proposed waste lead acid battery transfer station will not affect the existing CN rail lines and associated spur line or the residential area.

There is the potential for air emissions to be produced from the operation of the proposed lead acid battery 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 lead acid 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 lead acid batteries are maintained and in proper working condition. It is anticipated that potential effects as a result of air emissions from the project are negligible.

The operation of the proposed lead acid battery transfer station 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 lead acid 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 lead acid battery transfer station.

Given the location of the facility in a heavy manufacturing, existing industrial, commercial and retail developments surrounding the site, and distance to the nearest residential property of approximately 250 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 lead acid 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 lead acid battery transfer station 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 lead acid 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 lead acid 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 B, E and F respectively, are reviewed, understood and adhered to by all personnel working in the lead acid 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 lead acid batteries.

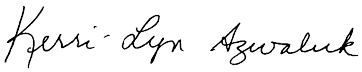
As the project is not anticipated to cause any effects to the biophysical or socio-economic environments adjacent to the site, no follow-up plans or monitoring plans are required.

Conclusion

As a result of the project location (heavy industrial use), current existing environment of the site (commercial use) and adherence to the contingency plans (including emergency response, fire safety and storage of batteries) developed by Direct LP for the lead acid 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:



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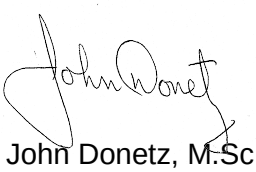


John Donetz, M.Sc.
Senior Environmental Scientist
AMEC Environment & Infrastructure

TABLE OF CONTENTS

LIST OF APPENDICES

LIST OF FIGURES

1.0 INTRODUCTION

Mr. Gordon R. Karpf of Direct LP authorized AMEC Environment & Infrastructure, a division of AMEC Americas Limited (AMEC), to complete an Environmental Assessment (EA) Report for a proposed waste lead acid battery transfer station to be located at 55 Rothwell Road in Winnipeg, Manitoba (Figure 1). Currently, the proposed project site is occupied and operated by Direct Distribution, with two additional tenants; Western Canada Express and Enns Brothers.

A licence for a facility to store and transfer waste batteries is required under the Dangerous Goods Handling and Transportation (DGHT) Act. Direct LP requested AMEC prepare the Environmental Assessment Report as part of their DGHT Act application for the Site.

2.0 DESCRIPTION OF PROPOSED DEVELOPMENT

2.1 Legal Land Description

The proposed project site is located along the south side of Rothwell Road in the Fort Garry North neighbourhood of the Lindenwoods Ward of the City of Winnipeg, Manitoba (Figure 2). The current owners of the proposed project site on which the proposed waste battery transfer and handling site to be developed is Direct Distributions.

2.2 Current Site Description and Facilities

The proposed project site identified for the battery waste handling facility is located along the south side of Rothwell Road in the Fort Garry North neighbourhood of the Lindenwoods Ward of Winnipeg, Manitoba. The site is developed with a large commercial building divided into office spaces, a warehouse area and cross dock area. The surrounding land consists of manufacturing properties, commercial uses, and undeveloped grassed land, described below.

North: Rothwell Road is located adjacent the Site to the north, followed by several commercial properties including, Arrow Specialities (advertising), Vermeer Canada Inc. (Contractors supply and service), and Urbanmine Inc. (recycling facility) located approximately 30 m north /northeast.

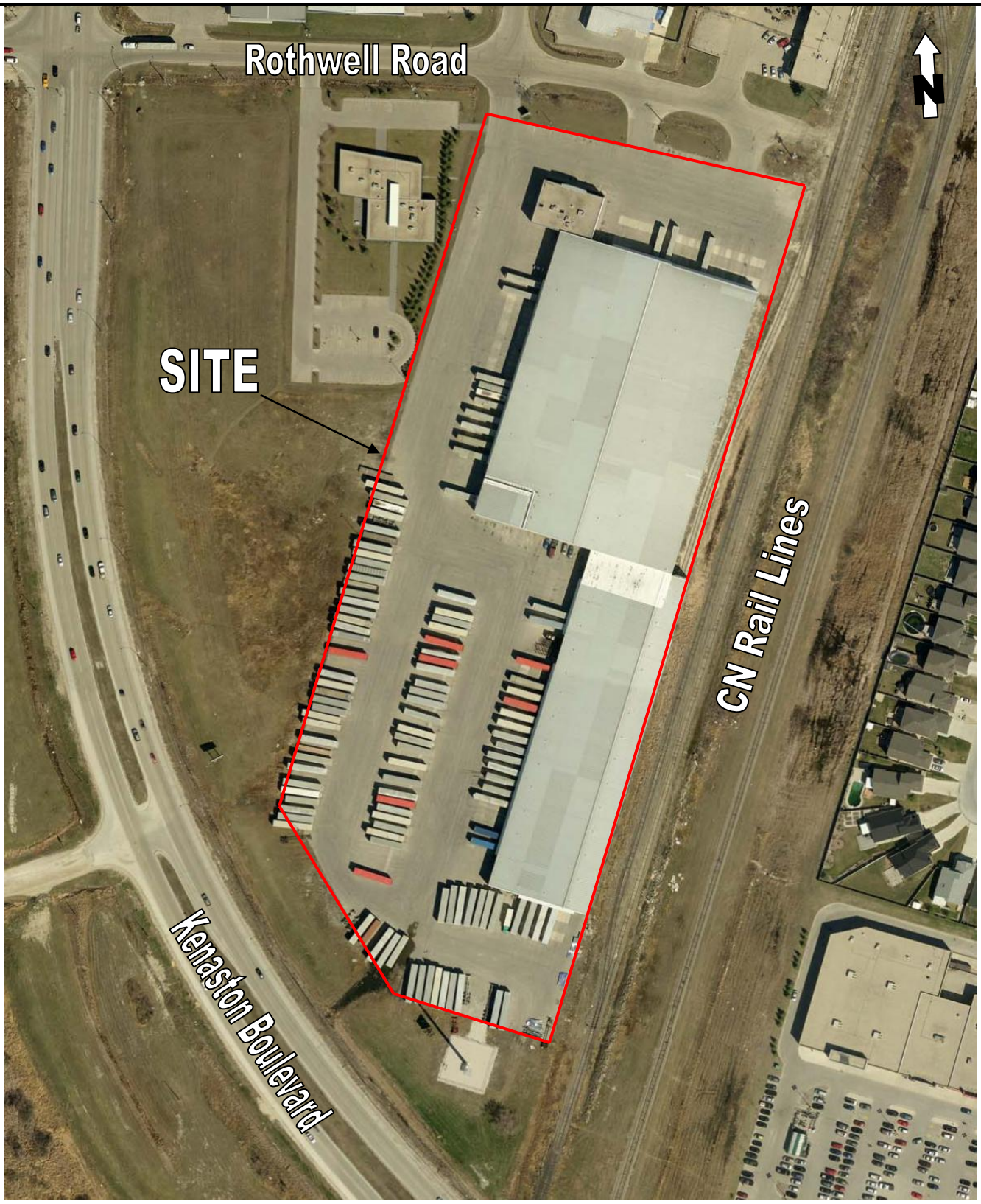
South: Kenaston Boulevard is located adjacent to the Site to the south, followed by an undeveloped grassed area with a retention pond beyond.

East: Two Canadian National (CN) rail lines and a rail spur leading onto the Site followed by a mixture of residential and commercial (retail) properties east of the Site.

West: A commercial building occupied by Canada Cartridge Systems is located adjacent to the northern portion of the western Site boundary. The remainder of the land west of the Site and west of the commercial property consists of undeveloped grass covered land followed by Kenaston Boulevard

CITY OF WINNIPEG

amec **Environment & Infrastructure** **DIRECT LP**		**REGIONAL PROJECT SITE LOCATION** **55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
Drawn: N/A	Scale: ~1:150 000	Date: JUL/31	Project No.: WX17199	Figure: 1



amec Environment & Infrastructure DIRECT LP		**PROJECT SITE PLAN 55 ROTHWELL ROAD WINNIPEG, MANITOBA**		
Drawn: N/A	Original Scale: Unknown	Date: JULY/2013	Project No.: WX17199	Figure: 2

The following information provides a description of the existing site conditions and facilities found on the site property and immediately adjacent to the property. This information was collected during the site investigation that was conducted on July 10, 2013 for the Phase I Environmental Site Assessment (ESA) prepared by AMEC for the site.

At the time of the Phase I ESA Site inspection, the property was developed with a concrete block and steel frame building. According to the City of Winnipeg Taxation and Assessment Department, the building was constructed in 1999. The northwest corner of the Site building consisted of a two story office area shared by Direct Distribution and Enns Brothers. Additional, small office spaces were observed in the warehouse and cross dock portions of the Site building associated with the shipping / receiving operations of Direct Distribution and Western Canada Express.

South of the office space is the warehouse area, occupied by Direct Distribution. Multiple loading docks were observed along the west and south exterior walls of this area. The warehouse area was observed to consist of multiple isle ways of shelving units utilized to store various items that are shipped in as part of Direct Distributions operations.

The cross dock area is located south of the warehouse. The northern portion of the cross-dock area is occupied by Direct Distribution, with the southern portion of the area occupied by Western Canada Express. Much like the warehouse area, this area was observed to consist of multiple isle ways of shelving units utilized to store various items that are shipped in as part of Direct Distributions operations. Pallets of items shipped in for Western Canada's Operations were observed within their portion of the Site building.

A rail spur was observed to branch off from the rail line located adjacent to the eastern Site boundary. The rail spur was observed to run along the eastern Site boundary and enter the eastern most part of the Site building. The rail line within the site building was observed to run the entire length of the cross dock portion of the warehouse.

The remainder of the Site was observed to consist of paved areas utilized as parking areas, trailer storage areas and access areas to the many loading docks located along the warehouse and cross dock areas.

Given the nature of Direct Distribution and Western Canada Express's operations various chemical and solutions are temporality stored within the Site building until they can be shipped out to clients/customers. It was reported to AMEC that all products that are shipped and stored on Site are stored within the Site building. Additionally, it was reported that the chemicals and petroleum products that are utilized as part of the Direct Distributions operations are stored within the Site building.

Additional information on the site can be found in the Phase I Environmental Site Assessment prepared for the site (Appendix A). Site photographs are provided in Appendix D of the Phase I ESA report.

2.3 Land Use Designation

According to the City of Winnipeg Citizen's Information Service, the Site and adjacent properties are zoned for heavy manufacturing (M3).

2.4 Proposed Development Use

Direct LP is applying for a license for the proposed project site which would allow them to temporarily store and transfer waste lead acid batteries (Figure 3 and 4). 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 B.

2.5 Funding

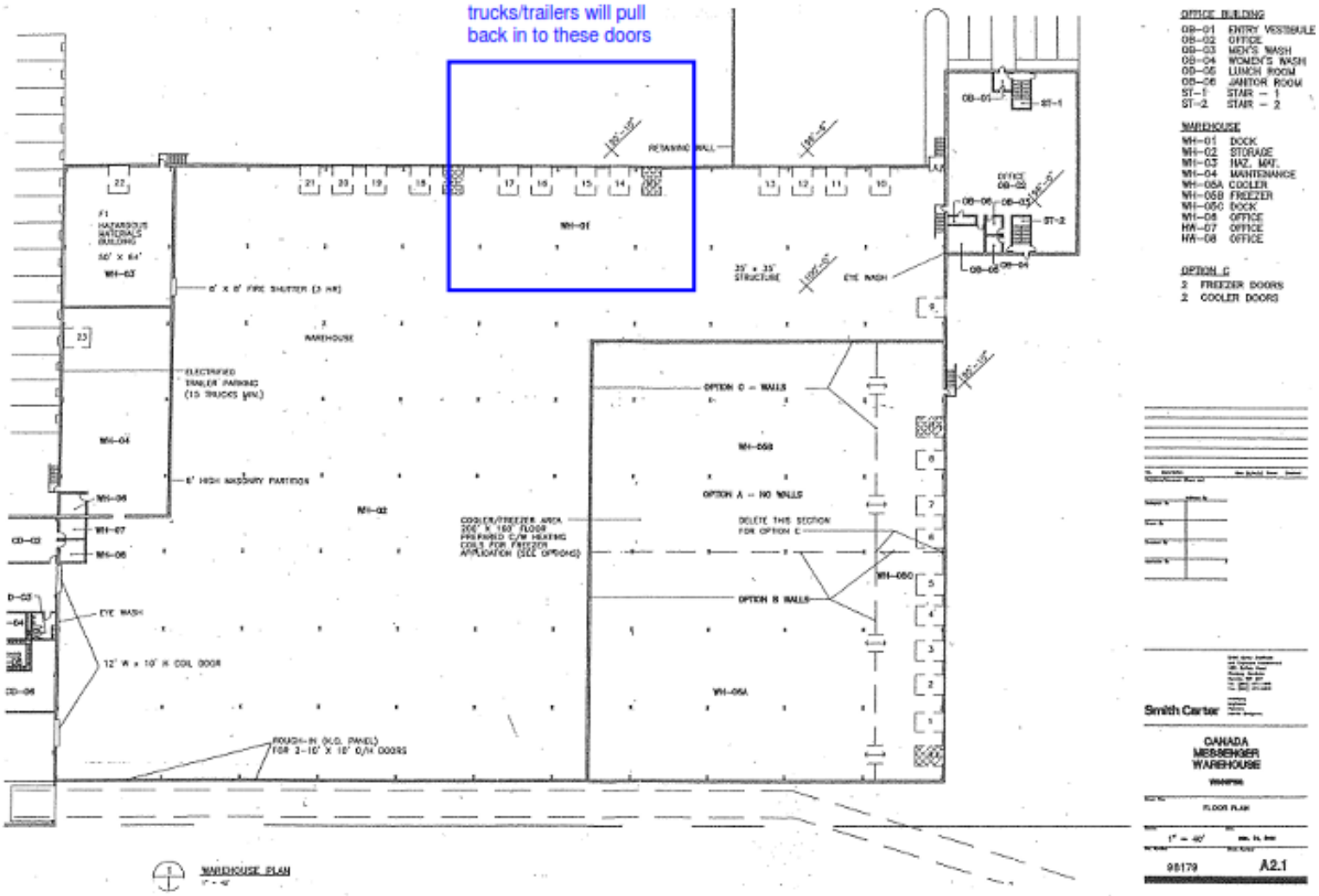
All costs required for the development of the waste battery transfer and handling storage areas would be funded by Direct Distribution (owners of the property).

2.6 Regulatory Permits/Authorizations/Approvals

According to AMEC's preliminary search for the Phase I Environmental Site Assessment (Appendix A), the Site is listed on Manitoba Conservation's Hazardous Waste Generators List, Petroleum Storage Tank Registry, Impacted Sites List, or PCB Storage Facility Registry. Manitoba Conservation was contacted to gather more information with regards to the Site. According to Mr. Rospad, the Site is registered for the generation of printing ink or printing ink related material at a rate of 5 L per month, and isocyanates, or flammable solutions with no specified quantity. This registration began in March 2002.

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 City of Winnipeg Solid Waste By-Law 110/2012 will be adhered to. There are no federal legislations applicable to the project.



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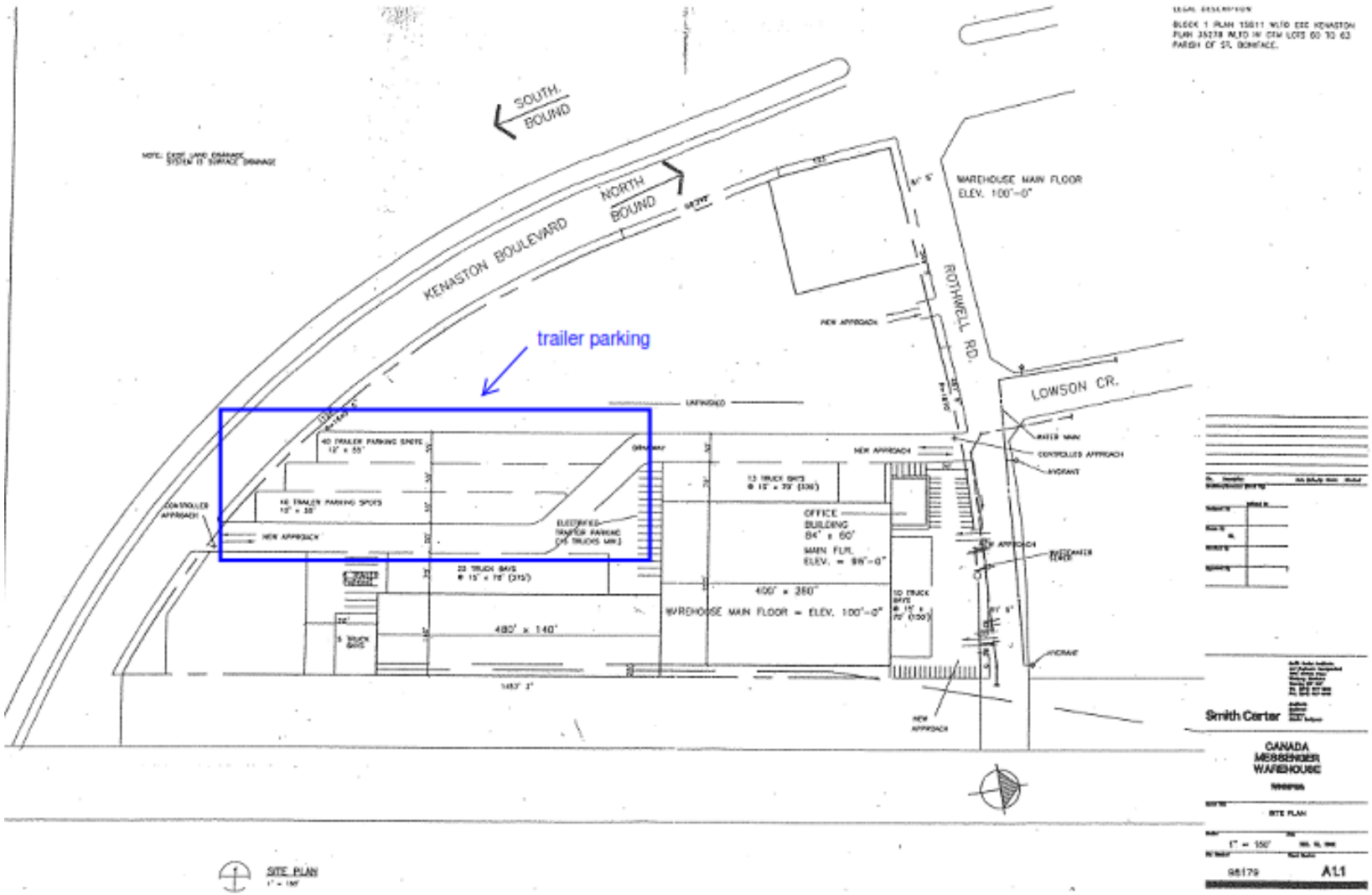
Environment & Infrastructure

DIRECT LP

PROJECT SITE PLAN – UNLOADING ZONE
55 ROTHWELL ROAD
WINNIPEG, MANITOBA

Drawn: N/A	Original Scale: Unknown	Date: JULY/2013	Project No.: WX17199	Figure: 3



SITE PLAN

amec **Environment & Infrastructure** **DIRECT LP**		**PROJECT SITE PLAN – SHORT TERM STORAGE** **55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
Drawn: N/A	Original Scale: Unknown	Date: JULY/2013	Project No.: WX17199	Figure: 4

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 (Smith et. al., 1998).

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 (Smit et. al., 1998).

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 (Smith et. al., 1998).

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 (Government of Canada, 2013). 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

Source: Government of Canada. 2013. Environment Canada Calculation Information for 1971 to 2000 Canadian Normals Data – Winnipeg Richardson Airport. Website Accessed July 2013. http://climate.weather.gc.ca/climate_normals

3.1.3 Geology and Groundwater

Based on geological maps (Baracos et al., 1983), the subsurface stratigraphy located at the proposed site consists of topsoil and fill materials underlain by glacio-lacustrine silt and clay to a depth of about 9 to 12 meters (m) from grade. A deposit of silty till, typically a few meters or more in thickness, occurs between the clay and the underlying bedrock. Bedrock in this area is from the Upper Fort Garry Member and consists of cherty limestone of variable thickness (Baracos et al., 1983). Bedrock is estimated to occur at about 12 to 15 m below grade.

According to Smith et. al., the Winnipeg Ecodistrict lies in the central lowland of the Red River Plain and is characterized as being smooth, level to very gently sloping, with clayey glaciolacustrine plain with a mean elevation of approximately 236 metres above sea level (masl).

Fractured zones in the bedrock comprise the major aquifer in the area. There are no aquifers above the bedrock. Given the substantial clay thickness, the potential for contamination of the aquifer, from on or off-site sources, is considered to be low (Baracos et al., 1983).

3.1.4 Physiography and Surficial Drainage

The topography of the Site was characterized as being generally flat-lying. It is anticipated that overland storm water collected at the Site would flow north toward the adjacent roadway and associated catch basins, toward the adjacent rail line to the east, or towards the undeveloped land south and west of the Site.

3.1.5 Surface Water Bodies

There are no surface water bodies located within the Site. The closet surface water bodies to the site are Lake Devonian and Muir Lake near Fort Whyte Alive, which are located approximately 1.8 km southeast of the Site. The project site will not affect these surface water bodies.

3.1.6 Vegetation

During the Site visit completed as part of the Environmental Screening, the ground surface was predominantly asphalt with trees, low lying vegetation and manicured grasses. Bulrushes, sedges and reeds were observed adjacent to the Site. The other surrounding areas to the Site contained similar vegetation and ground cover.

The Manitoba Conservation Data Centre (MBCDC) maintains a list of plant species of conservation concern in the province. Appendix C, Table C1 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 C, Table C2.

The potential for any species of concern to occur at the Site is low due to industrial use, ground paving, and maintained vegetation areas.

3.1.7 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 C, Table C1 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 C, Table C2.

As a result of the proposed site being located in an existing heavy manufacturing use area 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 is negligible.

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

3.1.8 Aquatic Species and Habitat

There are no major waterbodies located at the proposed site. The nearest waterbodies, Lake Devonian and Muir Lake near the Fort Whyte Alive Centre, are located approximately 1.8 km southeast of the Site. The project site will not affect these surface water bodies or aquatic species within these waterbodies.

3.2 SOCIOECONOMIC AND LAND USE ENVIRONMENT

3.2.1 Infrastructure and Commercial Properties

The proposed site is located in located in an area zoned for heavy manufacturing (M3) by the City of Winnipeg. Existing infrastructure located adjacent to the proposed site includes the following:

- Rothwell Road is located immediately adjacent to the proposed site on the north side. On the East side of the property, Kenaston Boulevard is a located within 180 metres of the proposed site on the west and south side.
- Commercial properties located immediately north of the proposed site include Arrow Specialities (advertising), Vermeer Canada Inc. (Contractors supply and service), and Urbanmine Inc. (recycling facility)
- Two Canadian National (CN) rail lines and a rail spur leading onto the Site are located on the east side of the proposed project location
- Residential properties are located approximately 250 m from the proposed site (50 m from the CN Rail Lines) on the east side,

- A commercial building occupied by Canada Cartage System is located adjacent to the northern portion of the western Site boundary. The remainder of the land west of the Site and west of the commercial property consists of undeveloped grass covered land followed by Kenaston Boulevard.
- An existing distribution line is located immediately adjacent to the property on the north side and and existing distribution line is located adjacent to Kenaston Boulevard approximately 180 metres west of the site.
- Associated sewer, water and gas lines with the commercial and residential properties located adjacent to the site

3.2.2 Recreation

There are no federal, provincial or municipal parks located on or immediately adjacent to the proposed site. The closest municipal parks are Kleysen and Van Walleghem Park located approximately one kilometre and 1.8 kilometres east of the site respectively, and Shindleman Park located approximately 1.8 km northwest of the proposed site.

The Fort Whyte Alive Centre which provides programming, natural settings and facilities for environmental education, outdoor recreation and social enterprise is located approximately 1.8 km southwest of the site.

3.2.3 Heritage Sites

There are no City of Winnipeg 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 two (2) kilometres of the proposed project site.

3.2.5 Schools

There are no schools located within one kilometre of the proposed site.

3.2.6 Residential

The community of Lindenwoods, with approximately 2400 houses, is the closest residential area located approximately 250 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 wast 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. commercial, residential, retail, industrial). Air emissions (exhause) produced from the trucks are considered negligible.

4.3 Noise Emissions

There is the potential for additional noise to be generated from the slight increased in truck traffic that will be generated as a result of the proposed wast battery facility. Given the location of the facility in a heavy manufacturing zoned area of the City of Winnipeg and the distance to the nearest residential property of approximately 250 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 generated, 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 Abosrb 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 B, E and F 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 D.

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 heavy industrial area, and that the existing site is predominantly asphalt with tree low lying vegetation and manicured grasses there are no anticipated effects to any wildlife or vegetation species of conservation concern.

4.6 Aquatic Habitat and TIAR

As there are no waterbodies located in the proposed project site, the project will 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 asphalt with trees, low lying vegetation and manicured grasses, potential effects to and 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 new residents or workers from other industries accessing 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 lead acid 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 B (Direct LP Hazardous Waste Management Contingency Program – Batteries) and Appendix D (Storage of Waste Lead Acid Batteries), and Appendix E (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 F.
- 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 B), Emergency Response Plans (Appendix E), and Fire Safety Plans Procedures outlined in Appendix F, 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.

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

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APPENDIX A

PHASE I ENVIRONMENTAL SITE ASSESSMENT

PHASE I ENVIRONMENTAL SITE ASSESSMENT
55 ROTHWELL ROAD
WINNIPEG, MANITOBA

Submitted to:

Mr. Gordon R Karpf

Direct LP
1115 Cardiff Boulevard
Mississauga, Ontario
L5S 1L8

Submitted by:

AMEC Environment & Infrastructure
A Division of AMEC Americas Limited
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26 July 2013

AMEC Project No: WX17199

EXECUTIVE SUMMARY

AMEC Environment & Infrastructure, a division of AMEC Americas Limited ("AMEC"), was retained by Mr. Gordon R Karpf of Direct LP ("Client") to conduct a Phase I Environmental Site Assessment (ESA) of a commercial property located at 55 Rothwell Road, in Winnipeg, Manitoba (the "Site"). Currently, the Site is occupied and operated by Direct Distributions, with two additional tenants; Western Canada Express and Enns Brothers.

The purpose of the Phase I ESA was to identify actual or potential environmental concerns at the Site. The Phase I ESA methodology consisted of a review of selected historical and current information pertaining to the Site and surrounding properties; an inspection of the Site on 10 July 2013 to identify practices or circumstances that may present potential environmental liabilities; and interviews with personnel familiar with the Site. Site observations were of a visual, walk-through type and did not include sampling or testing, a process consistent with the industry standard.

A rail spur is currently located on Site and two rail lines are located adjacent to the east of the Site. Rail spurs may contain PAHs (Polycyclic Aromatic Hydrocarbons) which originate from a treatment process of the railroad ties, and metals. However, the mobility of PAHs and metals in soil is very limited and any impact would be expected to be localized. As such, there is a low to moderate potential for environmental impacts to the Site from the rail spur and rail lines. A Phase II ESA is not recommended at this time, however, to reduce the uncertainty of the potential impacts to the Site as a result of rail spur and rail lines a Phase II ESA would be required.

A summary of the on-site environmental issues assessed as part of the Site inspection and addressed in this report are presented below:

Site	55 Rothwell Road
Environmental Issue	**Comments**
Air Emissions	There were no sources of air emissions observed on Site at the time of the inspection, apart from standard heating and cooling equipment.
Asbestos Containing Materials (ACMs)	As the Site was developed in 1999, asbestos containing materials are not expected to be present on-site.
Polychlorinated Biphenyls (PCBs)	As the Site building was constructed well after the ban on PCBs, PCBs are not expected to be present on Site.
Lead Containing Paints (LCPs)	Based on the construction date of the Site building (1999), LCPs are not expected to be present.

Hazardous and Non-Hazardous Chemical Use and Storage	Apart from items that are temporarily stored on Site as a part of Direct Distribution and Western Canadian Express's operations, the following chemicals were observed on Site at the time of the inspection; general cleaning products, used oil (in used oil tank), motor oil, hydraulic oil, diesel fuel, adhesives, and lubricants and grease.
Storage Tanks - Underground (USTs) - Aboveground (ASTs)	An approximate 2500 L used oil tank was observed in the hazardous room located in the warehouse portion of the Site building. Small areas of surface staining were observed near the storage tank.
Hazardous and Non-Hazardous Solid Waste	An approximate 2500 L used oil tank was observed in the hazardous room located in the warehouse portion of the Site building. It was reported to AMEC that used oil that is collected from the general maintenance of the forklifts on site is stored in this location until it can be hauled off site by Envrio West. Additionally, Mr. Maria reported that any spills that occur on Site are cleaned with absorb all, which is then placed in a container that is hauled off-site by Envrio West. Non-hazardous solid waste was disposed in a metal dumpster located to the west of the building.
Ozone Depleting Substances (ODSs)	Refrigeration equipment including the building's air conditioning unit, may contain ODSs which would require servicing by a licensed technician.
Liquid Effluents	Liquid effluents (i.e. system process water and discharges to sewers or other disposal systems) were limited to domestic sewage, which was directed to the municipal sewer system.
Groundwater Wells	There are no known groundwater wells currently in use at the Site or surrounding area.
Radon	None known or reported at the time of the Site inspection.
Suspect Visible Mould Growth (SVG)	Evidence of SVG was not observed within the Site building. Water damage was observed to a small section of ceiling tiles in various areas of the office portions of the Site building.
Mercury	Potential sources of mercury observed at the Site were limited to thermostats, small commercial switches, industrial switches, and fluorescent lamps.
Radioactive Materials	None observed or reported at the time of the Site inspection.
Urea Formaldehyde Foam Insulation (UFFI)	None observed or reported at the time of the Site inspection.

TABLE OF CONTENTS

LIST OF TABLES

LIST OF APPENDICES

1.0 INTRODUCTION

1.1 PROJECT BACKGROUND AND TERMS OF REFERENCE

Mr. Gordon R Karpf of Direct LP ("Client") authorized AMEC Environment & Infrastructure (AMEC), a division of AMEC Americas Limited, to conduct a Phase I Environmental Site Assessment (ESA) of the property with the municipal address of 55 Rothwell Road in Winnipeg, Manitoba. The subject property is subsequently referred to as the 'Site' in this report.

1.2 SITE LOCATION AND ZONING

The Site is located in Winnipeg, Manitoba. According to the City of Winnipeg Citizen's Information Service, the Site and adjacent properties are zoned for heavy manufacturing (M3).

A map showing the location of the Site in relation to Winnipeg is shown in Figure A1, Appendix A. A plan showing the layout of the Site and the neighbouring properties is provided in Figure A2, Appendix A.

2.0 ENVIRONMENTAL SITE ASSESSMENT PROCESS

2.1 OBJECTIVES

The purpose of the Phase I ESA was to identify actual or potential environmental concerns at the Site. A Phase I ESA may assist in reducing the uncertainty about potential environmental liabilities and may be a basis for further investigation of the property. A Phase I ESA may be used to make informed decisions about property transactions, identify certain baseline environmental conditions, assist in meeting regulatory requirements, and as an initial step in Site remediation. Site observations were of a visual, walk-through type and did not include sampling or testing, a process consistent with the industry standard.

2.2 SCOPE OF WORK

As part of the Phase I ESA process, it is necessary to establish past and current activities at the Site and assess the possibility of these activities providing and actual or potential concern (impact) to the Site as indicated in the Canadian Standards Association (CSA) Phase I ESA guideline (Z768-01, Reaffirmed 2012).

- a review of selected historical and current information pertaining to the Site and surrounding properties;
- an inspection of the Site to identify practices or circumstances that may present potential environmental liabilities;
- interviews with personnel familiar with the Site; and
- a summary report.

Specific environmental issues that were addressed included:

- air emissions;
- asbestos containing materials (ACMs);
- polychlorinated biphenyls (PCBs);
- lead containing paint (LCP);
- hazardous and non-hazardous chemical use and storage activities;
- underground and aboveground storage tanks (USTs and ASTs);
- hazardous and non-hazardous wastes;
- ozone depleting substances (ODSs);
- liquid effluent;
- radon;
- suspect visible mould growth (SVG);
- radioactive materials;
- urea formaldehyde foam insulation (UFFI);
- dumps and landfills; and
- potential off-site sources of impact.

While this report provides an overview of potential environmental concerns, both past and present, the environmental site assessment process is limited by the availability of information at the time of the assessment. It is possible that unreported disposal of waste or illegal activities impairing the environmental status of the property may have occurred which could not be identified. A statement of limitations is provided in Appendix B.

2.3 METHODOLOGY

This assessment was conducted in general accordance with CSA Z768-01 (Reaffirmed 2012), which is currently referenced by the Canadian Mortgage and Housing Corporation (CMHC) and most banking institutions. Briefly, this guideline sets standards for review of information pertaining to the Site, development of detailed checklists or protocols, conducting the site inspection and preparation of the final report.

Ms. Angela Smith, of AMEC's Winnipeg Operations conducted the Site visit on 10 July 2013. Mr. Gary Maria, Operations Manager for Direct Distribution, assisted with the Site visit and provided information regarding the history and operations of the Site. Additional persons contacted or interviewed to evaluate the existing/historical Site operations included the following:

Name	Agency or Company	Position
Ms. Chris Hnat	Manitoba Conservation	Coordinator of Environmental File Searches
Mr. Warren Rospad	Manitoba Conservation	District Supervisor / Environment Officer

The qualifications of the assessors involved in the preparation of this report are provided in Appendix C.

2.3.1 Historical Review

A summary of the Site history was completed through a review of available sources of land use information, in order to assess the potential for site impacts from historic Site activities. The sources reviewed as part of the assessment included:

- Aerial photographs;
- Manitoba Conservation (MC) Files;
- Insurers' Advisory Organization (IAO) Fire Insurance Plans;
- Street Directories (Henderson Directories and MTS Fast Finder Directories);
- City of Winnipeg Property Assessment Department;
- Client supplied or publicly available reports or files; and
- Interviews with people knowledgeable of Site history.

Unless otherwise noted, AMEC's historical review of neighbouring properties was generally limited to a 100 m radius of the Site.

2.3.2 Review of Regulatory Information

A review of the following regulatory information was conducted:

- MC list of Impacted Sites (September 2011 and May 2012);
- MC list of Registered Petroleum Storage Tank Sites (February 2001, 2007, November 2011, and November 2012);
- MC list of Registered PCB Storage Sites (January 1999); and
- MC list of Registered Hazardous Waste Generators, Shippers and Receivers (June 2011 and September 2012).

It should be noted that review of the above regulatory documents is limited to that information which is publicly available. A review of the most current data is undertaken by MC and provided within approximately six weeks of AMEC's request. The above information is reviewed independently by AMEC to gain an understanding of whether any information may exist, within a more reasonable time frame, and is subject to later confirmation by the official MC file search.

3.0 SITE AND SURROUNDING LAND USE DESCRIPTION

3.1 SETTING OF SITE AND SURROUNDING LANDS

The Site is located along the south side of Rothwell Road in the Fort Garry North neighbourhood of the Lindenwoods Ward of Winnipeg, Manitoba. The Site was developed with a large commercial building divided into office spaces and a warehouse area and cross dock area. The surrounding land consisted of manufacturing properties, commercial uses, and undeveloped grassed land, described below.

North: Rothwell Road is located adjacent the Site to the north, followed by several commercial properties including, Arrow Specialities (advertising), Vermeer Canada Inc. (Contractors supply and service), and Urbanmine Inc. (recycling facility) located approximately 30 m north /northeast.

South: Kenaston Boulevard is located adjacent the Site to the south, followed by an undeveloped grassed area with a retention pond beyond.

East: Two Canadian National (CN) rail lines and a rail spur leading onto the Site followed by a mixture of residential and commercial (retail) properties approximately 80 m east of the Site.

West: A commercial building occupied by Canada Cartage Systems is located adjacent to the northern portion of the western Site boundary. The remainder of the land west of the Site and west of the commercial property consists of undeveloped grass covered land followed by Kenaston Boulevard

3.2 SITE APPEARANCE AND DESCRIPTION OF FACILITIES

At the time of the Site inspection, the property was developed with a concrete block and steel frame building. According to the City of Winnipeg Taxation and Assessment Department, the building was constructed in 1999. The northwest corner of the Site building consisted of a two story office area shared by Direct Distribution and Enns Brothers. Additional, small office spaces were observed in the warehouse and cross dock portions of the Site building associated with the shipping / receiving operations of Direct Distribution and Western Canada Express.

South of the office space is the warehouse area, occupied by Direct Distribution. Multiple loading docs were observed along the west and south exterior walls of this area. The warehouse area was observed to consist of multiple isle ways of shelving units utilized to store various items that are shipped in as part of Direct Distributions operations. Some of the items observed in this area included; mechanical equipment, various chemicals and solutions, and retail related items. Located in the southwest corner of the warehouse area was the hazardous room where type three chemicals and solutions were stored. This room was observed to have a separate ventilation system from the remainder of the building and a sloped floor to prevent and potential spills in the area from travelling outside of the hazardous room. Within the hazardous room an approximate 2500 L storage tank was observed, where areas of surface staining were observed beneath the storage tank. It was reported to AMEC that used oil that is collected from the general maintenance of forklifts that completed on site is stored in this location until it can be hauled off site by Enviro West. Additionally, two approximately 205 L barrels of diesel fuel are also stored within this room, surface staining was not observed near the barrels. East of the hazardous room the maintenance room was observed. It was reported by Mr. Maria that general maintenance on forklifts is completed in this location. Several areas of surface staining were observed in this location. Additionally, a 110 L barrel of engine oil, two approximate 205 L barrel of engine oil, and three 20 L pails of hydraulic oil were observed in this location. Small

areas of surface staining were observed near all of the oil containers. It was reported to AMEC that any spills that occur on Site are cleaned with absorb-all, which is then placed in a container to be hauled off-site by Enviro West.

The cross dock area is located south of the warehouse. The northern portion of the cross-dock area is occupied by Direct Distribution, with the southern portion of the area occupied by Western Canada Express. Much like the warehouse area, this area was observed to consist of multiple isle ways of shelving units utilized to store various items that are shipped in as part of Direct Distributions operations. Pallets of items shipped in for Western Candada's Operations were observed within their portion of the Site building.

The walls throughout the building were observed to consist of a mixture of painted and exposed gypsum board, painted and exposed concrete block, and metal siding along the bottom 3 m of portions of the warehouse walls. Ceilings throughout the building were observed to primarily consist of a combination of suspended ceiling tiles, exposed steel beams and insulation. Flooring throughout the building was observed to consist of a mixture of carpeting, vinyl tile flooring in the office areas, and exposed concrete and finished concrete in the warehouse areas. Lighting was provided by a mixture of fluorescent tube lighting and metal halide lamps. Heating was provided to the building by a combination of electric baseboard radiant heaters and suspended natural gas-fired radiant heating units. Cooling was provided to the building by a combination of one roof-mounted and two pad mounted air conditioning units that are utilized to cool the office portions of the Site building. Roofing of the building was reported to consist of a mixture of corrugated metal and tar and gravel. Siding was observed to consist of a mixture of stucco and corrugated metal siding.

A rail spur was observed to branch off from the rail line located adjacent to the eastern Site boundary. The rail spur was observed to run along the eastern Site boundary and enter the eastern most part of the Site building. The rail line within the site building was observed to run the entire length of the cross dock portion of the warehouse.

The remainder of the Site was observed to consist of paved areas utilized as parking areas, trailer storage areas and access areas to the many loading docks located along the warehouse and cross dock areas.

Given the nature of Direct Distribution and Western Canada Express's operations various chemical and solutions are temporality stored within the Site building until they can be shipped out to clients / customers. It was reported to AMEC that all products that are shipped and stored on Site are stored within the Site building. Additionally, it was reported that the chemicals and petroleum products that are utilized as part of the Direct Distributions operations are stored within the Site building. Given that the Site building is developed on a concrete slab, impacts to the Site as a result of the various chemicals, and petroleum products that are stored within the Site building is considered to be low.

Site photographs taken at the time of the site inspection are provided in Appendix D.

3.3 TOPOGRAPHY AND DRAINAGE

The topography of the Site appeared to be generally flat-lying. It is anticipated that overland storm water collected at the Site would flow north toward the adjacent roadway and associated catch basins, toward adjacent rail line to the east, or towards the undeveloped land south and west of the Site.

3.4 SITE GEOLOGY AND GROUNDWATER

Based on geological maps, the subsurface stratigraphy in this area of Winnipeg normally consists of topsoil and fill materials underlain by glacio-lacustrine silt and clay to a depth of about 9 to 12 meters (m) from grade. A deposit of silty till, typically a few meters or more in thickness, occurs between the clay and the underlying bedrock. Bedrock in this area is from the Upper Fort Garry Member and consists of cherty limestone of variable thickness (Baracos et al., 1983). Bedrock is estimated to occur at about 12 to 15 m below grade.

Fractured zones in the bedrock comprise the major aquifer in the area. There are no aquifers above the bedrock. Given the substantial clay thickness, the potential for contamination of the aquifer, from on or off-site sources, is considered to be low.

4.0 SITE AND SURROUNDING AREA HISTORY

The Site has been an undeveloped grassed area since prior to 1998. It was reported to AMEC that a Phase I and Phase II ESA were conducted at the Site in1998 (also including the undeveloped adjacent property to the west) to addresses the issue of refuse (solid waste) of an unknown origin being dumped on the Site. At the time of the 1998 Phase I and II ESA, refuse, reported to consist of concrete, mattresses, wood scraps, etc., was removed from the southernmost portion of the Site. Surface vegetation was also removed at this time, and any good-quality or extra fill on Site was used to form the berms located along the western portion of the Site. The current Site building was developed in 1999; there has been no substantial change to the Site since the development of the Site building.

The history of the surrounding properties is summarized as follows:

Rothwell Road has been located adjacent to the Site to the north since prior to 1977. Sometime between 1988 and 1997 commercial properties were developed in the area beyond Rothwell Road. There have been no other substantial changes to the area since 1997.

Undeveloped land has been located west of the Site prior to 1950. Between 1950 and 1960, Kenaston Boulevard was developed west of the Site. There has been no substantial change to the area since 1960.

Two Canadian Pacific rail lines situated in a north / south direction have been located adjacent to the east of the Site prior to 1950. Between 2002 and 2004 the commercial buildings and residential properties beyond the rail line were developed. There have been no other substantial changes to the area since 2004.

A more specific summary of the historic land use, as determined through the various sources, is provided in the following sections.

4.1 FIRE INSURANCE PLAN REVIEW SUMMARY

Fire insurance plans were not available for the Site or the immediate area in the City of Winnipeg.

4.2 STREET DIRECTORY REVIEW

A summary of the Henderson Street Directory and MTS Fast Finder Directory review is provided in Table 2.

TABLE 1: STREET DIRECTORY REVIEW

Street Address	Occupant	Approx. Date
Site 55 Rothwell Road	No listings	1998 and prior
	Direct Distribution Center	1999 - 2013
	Western Canada Express	2013
	Enns Brothers	2013
North of Site 72 Rothwell Road	No listings	1980 and prior
	Trans Western Express	1985 – 2000
	Urbanmine Inc.	2013
North of Site 227 – 236 Lowson Crescent	No listings	1980 and prior
	Commercial / light industrial (various listings)	1980 - 2012
	• 237 Admiral Printing Ltd.	2013
Northwest of Site 12 Rothwell Road	No listings	1985 and prior
	Westland Plastic	1990 - 2012
South of Site	Undeveloped land with no civic addresses	2012 and prior
East of Site 1539 - 1549 Kenaston Boulevard	No listings	2000 and prior
	Commercial	2013
East of Site 67 - 167Lindenmere Drive	No listings	2000 and prior
	Residential	2013
West of Site 25 Rothwell Road	No listings	2000 and prior
	Canada Cartage Systems	2013

Notes: Street Directories reviewed on approximate 5 year intervals.
Where commercial use is indicated businesses such as department stores, offices, and supply stores and other such uses were listed.

4.3 AERIAL PHOTOGRAPHS

A summary of the aerial photograph review is provided in Table 3. Aerial photographs from 1960, 1977, and 1997 are provided in Appendix E. The Site Plan, Figure A2 (Appendix A) is comprised of the 2012 aerial photograph.

TABLE 2: AERIAL PHOTOGRAPH REVIEW SUMMARY		
DATE ROLL NO. SCALE	**SITE**	**SURROUNDING PROPERTIES**
1950 A12650–206 1: 8000	Undeveloped grassed and treed land.	**North, South, and West:** Undeveloped grassed and treed land. **East:** Two Canadian Pacific Rail lines followed by undeveloped grass and tree covered land.
1960 A16849-89 Unknown	As in 1950.	No substantial changes since 1950.
1968 A20412-117 1: 15 000	As in 1960.	Kenaston Boulevard is now visible south and west of the Site.
1977 A24650-135 1: 25 000	As in 1968.	No substantial changes since 1968.
1988 A27254-57 1: 20 000	A large section of trees has been cleared from the southern portion of the Site.	**South, East, and West:** No substantial changes since 1977. North: Rothwell Road and Lowson Crescent have been developed north of the Site
1997 MB97004-105 1: 20 000	All of the trees have been cleared from the Site.	**South, East, and West:** No substantial changes since 1988. **North:** Commercial properties are now visible north of Rothwell Road.
2012 Satellite image Unknown	The current commercial development now appears on Site.	**North and South:** No substantial change to the area. **East:** Residential and commercial property has now been developed beyond the CP rail lines. **West:** A commercial building has been developed adjacent to the northern portion of the western Site boundary.

4.4 PREVIOUS ENVIRONMENTAL REPORT REVIEW

The following report was supplied to AMEC for review:

- *Phase I & Limited Phase II Environmental Site Assessments & Geotechnical Investigation, Proposed Commercial Building Development, SE Corner – Rothwell Road & Kenaston Boulevard, Winnipeg, Manitoba,* 29 June, 1998. Prepared for Canada Messenger Ltd. Prepared by Geokwan Engineering Ltd.

The report covered the entire area of the Site and included the current property considered as the east adjacent site in this report (office building and distribution centre).

Based on the above noted report, supplied by the client, the following was concluded:

- Non-hazardous refuse (primarily wood, concrete rubble, and miscellaneous building materials) was scattered at ground surface at the property, and used to fill the area

adjacent to the southeast corner of the property in the 1980s. Removal and replacement of this debris with clean fill was recommended. The area of refuse indicated in the report is considered to east of the Site.

- To verify the possible presence and extent of hydrocarbon and metal impacts in the subsoils at the property, and the area of fill, a limited Phase II ESA was conducted between 9 June and 16 June 1998.

- Flammable vapour testing of selected samples from 50 holes, chemical testing of four soil samples (including a sample from the fill material), and chemical testing of one groundwater sample was conducted.

- Significant hydrocarbon vapour concentrations were not detected in the soil samples recovered from the 50 testholes.

- Benzene, toluene, ethylbenzene, xylene, (BTEX), volatile petroleum hydrocarbons (VPH), light extractable petroleum hydrocarbons (LEPH), and heavy extractable petroleum hydrocarbons (HEPH) results received from the soil samples submitted were non-detect.

- Heavy metal analysis results indicated that all samples analysed were below applicable CCME guidelines.

- BTEX and petroleum hydrocarbon concentrations were non-detect in the groundwater sample submitted.

- The study indicated that the property was suitable for commercial / industrial use, and the removal and replacement of the debris was recommended.

5.0 REGULATORY INFORMATION

5.1 LANDFILLS

According to the City of Winnipeg landfill plans, there are no current or former landfills or dump sites located within 2 km of the Site.

5.2 LOCAL REGULATORY AGENCY

According to AMEC's preliminary search, the Site is listed on MC's Hazardous Waste Generators List, Petroleum Storage Tank Registry, Impacted Sites List, or PCB Storage Facility Registry. Additionally, the neighbouring property at 72 Rothwell Road is registered with MC as a hazardous waste generator.

AMEC requested a file search for the Site and received a response on 25 July 2013. According to the most recent records the Site is registered as an active hazardous waste generator of printing ink, isocyanates or solutions, and batteries. According to MC there are no records of any outstanding work orders or environmental accidents found pertaining to the Site. Further, MC files indicated that the Site is not listed as a impacted / contaminated site in their files. A copy of the MC file search letter is provided in Appendix F.

6.0 POTENTIAL OFF-SITE SOURCES OF IMPACT

The property with the municipal address of 55 Rothwell Road, located adjacent to the southern portion of the eastern Site boundary, is listed on the MC Hazardous Waste Generators Registry. Mr. Warren Rospad, District Supervisor and Environment Officer for MC was contacted for information about this listing.

The rail lines currently located adjacent to the eastern Site boundary were developed prior to 1950. Historical rail lines may contain PAHs (Polycyclic Aromatic Hydrocarbons) which originate from a treatment process of the railroad ties, and metals. However, the mobility of PAHs and metals in soil is very limited and any impact would be expected to be localized. As such, there is a low to moderate potential for environmental impacts to the Site from the rail line.

A Printing shop (Admiral Printing Ltd.) has been located approximately 50 m north of the Site for the past decade. Historically printing shops store large quantities of inks and paper due to the nature of their service. Occasionally, stored materials may leak, resulting in contamination to the storage area. Spills, leaks, and discarded material will typically migrate to and contaminate soils, stream sediments, and groundwater. However, due to the location and the and the fact that the printing shop is located on a paved lot there is a low potential for environmental impacts to the Site from the printing shop.

A plastic manufacturing facility (Westland Plastics) has been located approximately 50 m northwest of the Site since 1990. The plastics industry uses two main types of resins; thermoplastic and thermosetting. Spillage of liquid resins could result in contaminated soil, sediment, and/or groundwater. However, due to the location and the and the fact that the Westland Plastics is located on a paved lot there is a low potential for environmental impacts to the Site from Westland Plastics.

It was indicated that refuse was formerly scattered on site and the property adjacent to the west of the Site, and that refuse was used as fill in the southern portion of the Site. A Phase I and Limited Phase II ESA study was conducted at the Site and this adjacent property in 1998 (see Section 4.4, above) to address any associated potential impacts. It was indicated in the report that laboratory results for contaminants of concern in soil and water at the property were below the recommended guidelines at the time. As a part of the current Phase I ESA study, the 1998 laboratory results were compared to current CCME guidelines, and it was confirmed the 1998 results are below current guidelines of all tested parameters. For this reason, impacts to the Site as a result of the former refuse at the Site and adjacent properties are not expected.

Two CN rail lines are currently located adjacent to the eastern Site boundary. Historical rail lines may be associated with such contaminants of concern as PAHs (Polycyclic Aromatic Hydrocarbons) which originate from a treatment process of the railroad ties, metals and those associated with storage or transfer operations (i.e coal or fuel). However, the mobility of PAHs and metals in soil is limited and any impact would be expected to be localized. As such, impacts associated with adjacent rail lines such as those present on the adjacent property are considered to pose a low to moderate potential for environmental impacts to the Site.

7.0 SITE ENVIRONMENTAL ISSUES

The following potential environmental issues were assessed as part of the Site inspection conducted 10 July 2013.

7.1 AIR EMISSIONS

There were no sources of air emissions observed on Site at the time of the inspection, apart from standard heating and cooling equipment.

7.2 ASBESTOS CONTAINING MATERIAL (ACMS)

Manitoba Workplace Safety & Health Regulations (217/2006) defines an ACM as any non-friable material containing 1.0% or greater asbestos fibres and any friable material containing 0.1% or greater asbestos fibres. Part 37 of the Regulation also requires that any potential ACM must be treated as an ACM unless laboratory analysis indicates otherwise. As part of this regulation, employees present in buildings with known or suspect ACMs must be informed and all ACMs must be identified. It must be recognised that there was no complete ban of asbestos in building and other material. Generally, buildings constructed prior to the mid 1980s or with building materials manufactured prior to the early 1980s (with exception of potential vermiculite insulation used in the early 1990s) have a greater likelihood that friable ACMs present. Friable ACMs may pose a higher risk to building occupants.

As the Site was developed in 1999, asbestos containing materials are not expected to be present on-site.

7.3 POLYCHLORINATED BIPHENYLS (PCBS)

PCB-containing products were manufactured for use in applications where stable, fire-resistant, and heat-transfer properties were demanded up to 1977. Most PCBs were sold for use as dielectric fluids (insulating liquids) in electric transformers and capacitors. Other uses included heat transfer fluid, hydraulic fluid, dye carriers in carbonless copy paper, plasticizers in paints, adhesives, and caulking compounds. In Canada, PCBs were prohibited from being used in products, equipment, machinery, electrical transformers and capacitors that were manufactured or imported into the country after July 1980.

Where possible, labelling or other forms of identification on electrical and other equipment are compared to summary documents prepared by Manitoba Hydro. Manitoba Hydro may be contacted to determine the PCB content of electrical transformers based on their serial numbers.
A pad-mounted transformer was observed north of the Site building. The transformer was marked with a white sticker that, based on literature provided by Manitoba Hydro, indicates that it is free of PCBs. Leaking and staining was not observed around the transformer. Additionally, a second transformer was observed within the Site buildings electoral room. The label on the transformer indicated that it was a dry type, thus indicating that the transformer is free of PCBs.

As the Site building was constructed well after the ban on PCBs, PCBs are not expected to be present on Site.

7.4 LEAD CONTAINING PAINTS (LCPS)

Lead was used extensively for pigmentation, sealing, and as a drying agent in oil based paints up until the early 1950s. Exterior paints typically contained up to 60% lead by weight. Beginning in the 1960s, a decrease in the content of lead employed in paints was initiated. In 1976, the Canadian Federal Government introduced the Liquid Coating Materials Regulations under the Federal Hazardous Products Act, restricting the maximum total lead content of paints and other liquid coating materials used in or around premises attended by children or pregnant women to 0.5% by weight (5000 mg/kg). In April 2005 the Canadian Federal Government enacted the Surface Coating Materials Regulations which reduce the maximum total lead content of any new surface coatings used in or around premises attended by children or pregnant women from 0.5% to 0.06% and more recently to 0.009%. This reduction does not generally apply to surface coating applied to buildings or other structures used for agricultural or industrial purposes as an anti-weathering or anti-corrosive coating.

Based on the construction date of the Site building (1999), LCPs are not expected to be present.

7.5 HAZARDOUS AND NON-HAZARDOUS CHEMICAL USE AND STORAGE

Apart from items that are temporarily stored on Site as a part of Direct Distribution and Western Canadian Express's operations, the following chemicals were observed on Site at the time of the inspection;

- General cleaning products
- Used oil (in used oil tank);
- Motor Oil;
- Hydraulic oil;
- Diesel fuel;
- Adhesives; and
- Lubricants and grease.

All chemicals were observed to be stored indoors in containers above a concrete slab. Various areas of surface staining were observed near or surrounding the various storage containers for chemicals and petroleum related products in the maintenance room. Chemicals and petroleum products that are stored within the Site building above a concrete slab are considered low potential for impacts to the Site.

7.6 UNDERGROUND AND ABOVEGROUND STORAGE TANKS (USTS AND ASTS)

An approximate 2500 L used oil tank was observed in the hazardous room located in the warehouse portion of the Site building. Small areas of surface staining were observed near the storage tank.

7.7 HAZARDOUS AND NON-HAZARDOUS WASTE

MC defines hazardous wastes, with certain exceptions, in general as 'waste dangerous goods' from the use of familiar products that households and businesses use every day. Hazardous waste can include waste paint, paint thinners, oil, oil filters, batteries, and cleaning chemicals, among many others. If the product has a dangerous goods safety mark (label) on the packaging, the waste product is more than likely a hazardous waste.

An approximate 2500 L used oil tank was observed in the hazardous room located in the warehouse portion of the Site building. It was reported to AMEC that used oil that is collected from the general maintenance of the forklifts on site is stored in this location until it can be hauled off site by Enviro West. Additionally, Mr. Maria reported that any spills that occur on Site are cleaned with absorb all, which is then placed in a container that is hauled off-site by Envrio West. Non-hazardous solid waste was disposed in a metal dumpster located to the west of the building.

7.8 OZONE DEPLETING SUBSTANCES (ODS)

ODS, such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and halons, may be used as refrigerants, propellants, and in the manufacture of items such as packaging, insulation, solvents, and halon based fire extinguishing agents. Under the Manitoba Ozone Depleting Substances and Other Halocarbons Regulation (Manitoba Regulation 178/05) all ODSs and specified greenhouse gases (GHGs) are subject to regulatory control including spill reporting, worker training, phase-out of materials, and proper recovery and disposal of substances. In Canada, the production or import of CFCs was completely banned in January 1996 and all equipment containing CFCs will be required to be recharged with an alternate refrigerant after December 2014. While less damaging to the ozone layer, HCFCs are being phased out in Canada over a series of cap reduction dates (1996, 2004, 2010, 2015, 2020 and 2030).

Refrigeration equipment including the building's air conditioning unit, may contain ODSs which would require servicing by a licensed technician.

7.9 LIQUID EFFLUENTS

Liquid effluents (i.e. system process water and discharges to sewers or other disposal systems) were limited to domestic sewage, which was directed to the municipal sewer system.

7.10 GROUNDWATER WELLS

There are no known groundwater wells currently in use at the Site or surrounding area.

7.11 RADON

Radon is a colourless, odourless gas that occurs naturally from the breakdown of Uranium. Radon can be found in high concentrations where there are soils and rocks containing high levels of uranium, granite, shale or phosphorus. In open air or in areas with high air circulation, radon is not considered a health problem. However, in confined areas (such as basements), radon can migrate through foundation cracks or sumps and become a health hazard. According to the Interdepartmental Working Group on Radon established by the government of Manitoba, bedrock in the Winnipeg area is known for having moderate to high radon gas-generating potential. Levels of radon are not regulated, however, Health Canada have established recommended radon concentrations for residential structures.

AMEC is unaware if there has been a radon gas survey completed at the Site. Generally speaking, maintaining good air circulation limits the potential for radon gas accumulation.

7.12 SUSPECT VISIBLE MOULD GROWTH

Suspected visible mould growth (SVG) on building materials is identified by visual growth or evidence of water intrusion / damage. Evidence of SVG was not observed within the Site building. Water damage was observed to a small section of ceiling tiles in various areas of the office portions of the Site building. SVG may occur within enclosed spaces and may not be evident from a walk through building assessment.

7.13 MERCURY

Mercury has historically been employed in the construction of thermostats, switches and lamps. Small commercial switches and thermostats reportedly may contain 2 to 18 mg of mercury with industrial switches and equipment containing 5 kg or more. Older mercury containing lamps can contain up to 80 mg of mercury per lamp. Newer style fluorescent lamps manufactured since 2000 have in the order of 4 to 12 mg of mercury per lamp. Other types of lamps, such as metal halide and high pressure sodium, can also contain mercury in the order of 20 to 250 mg/lamp.

Mercury was also commonly added to paint coatings as a fungal retardant, and other paint coatings, however it is not commonly tested for as the proper handling and disposal of lead containing paints would typically minimize any safety or disposal issues for mercury. The Surface Coating Materials Regulations restricted the maximum total mercury content of paints and other liquid coating materials to 10 mg/kg in or around premises attended by children or pregnant women.

Potential sources of mercury observed at the Site were limited to thermostats, small commercial switches, industrial switches, and fluorescent lamps.

7.14 RADIOACTIVE MATERIALS

No evidence of radioactive materials was identified during the Site visit.

7.15 UREA FORMALDEHYDE FOAM INSULATION (UFFI)

UFFI is a thermal insulation material that is pumped into interstitial spaces between the walls of buildings where it hardens to form a solid layer of insulation. The sale and installation of UFFI was banned for health-related reasons because of the formation of formaldehyde gas, which is released from the UFFI to the building interior. Most installations occurred between 1977 and its ban in Canada in 1980.

Because the building was constructed in 1999, UFFI is not expected to be present.

7.16 SUMMARY OF SITE INSPECTION FINDINGS

A rail spur is currently located on Site and two rail lines are located adjacent to the east of the Site. Rail spurs may contain PAHs (Polycyclic Aromatic Hydrocarbons) which originate from a treatment process of the railroad ties, and metals. However, the mobility of PAHs and metals in soil is very limited and any impact would be expected to be localized. As such, there is a low to moderate potential for environmental impacts to the Site from the rail spur.

8.0 CONCLUSIONS AND RECOMMENDATIONS

A rail spur is currently located on Site and two rail lines are located adjacent to the east of the Site. Rail spurs may contain PAHs (Polycyclic Aromatic Hydrocarbons) which originate from a treatment process of the railroad ties, and metals. However, the mobility of PAHs and metals in soil is very limited and any impact would be expected to be localized. As such, there is a low to moderate potential for environmental impacts to the Site from the rail spur. To reduce the uncertitenty of potential impacts to the Site as a result of rail spur and rail lines A Phase II ESA is not recommended at this time, however, to reduce the uncertainty of the potential impacts to the Site as a result of rail spur and rail lines a Phase II ESA would be required.

CLOSURE

The Canadian Standards Association notes that no environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of a standardized environmental site assessment protocol is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with the property, given reasonable limits of time and cost.

This report was prepared for the exclusive use of Direct LP and is intended to provide a Phase I ESA for the Site located at 55 Rothwell Road at the time of the Site visit. Any use which a third party makes of this report, or any reliance on or decisions to be made based on it, are the responsibility of the third party. Should additional parties require reliance on this report, written authorization from AMEC will be required. With respect to third parties, AMEC has no liability or responsibility for losses of any kind whatsoever, including direct or consequential financial effects on transactions or property values, or requirements for follow-up actions and costs.

The report is based on data and information collected during the Phase I ESA of the property conducted by AMEC. It is based solely on the conditions of the Site encountered at the time of the Site visit on 10 July 2013, supplemented by a review of historical information and data obtained by AMEC as described in this report, and discussion with a representative of the owner/occupant, as reported herein. Except as otherwise maybe specified, AMEC disclaims any obligation to update this report for events taking place, or with respect to information that becomes available to AMEC after the time during which AMEC conducted the Phase I ESA.

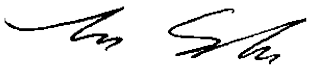
In evaluating the property, AMEC has relied in good faith on information provided by other individuals noted in this report. AMEC has assumed that the information provided is factual and accurate. In addition, the findings in this report are based, to a large degree, upon information provided by the current owner/occupant. AMEC accepts no responsibility for any deficiency, misstatement or inaccuracy contained in this report as a result of omissions, misinterpretations or fraudulent acts of persons interviewed or contacted.

AMEC makes no other representations whatsoever, including those concerning the legal significance of its findings, or as to other legal matters touched on in this report, including, but not limited to, ownership of any property, or the application of any law to the facts set forth herein. With respect to regulatory compliance issues, regulatory statutes are subject to interpretation and change. Such interpretations and regulatory changes should be reviewed with legal counsel.

This Report is also subject to the further Limitations contained in Appendix B.

We trust that the information presented in this report meets your current requirements. Should you have any questions, or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,
AMEC Environment & Infrastructure



Angela Smith, Dilp.
Environmental Technician

John Donetz
Senior Environmental Scientist
Project Manager

Reviewed by:

Kerri-Lyn Szwaluk, M.Sc., P.Ag
Senior Environmental Planner

Dist. (1) Electronic Copy – Addressee

9.0 REFERENCES

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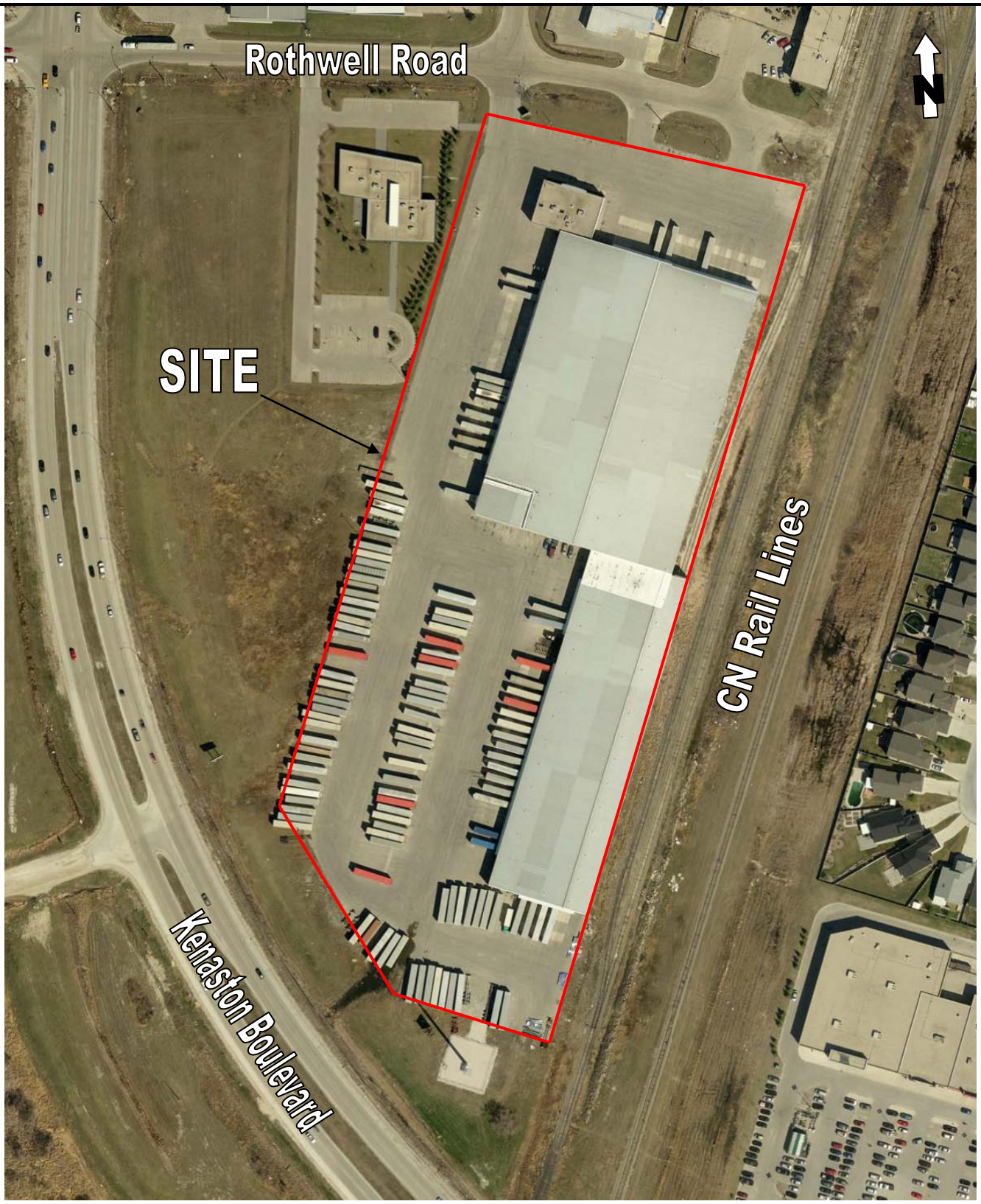
APPENDIX A

FIGURES

CITY OF WINNIPEG

amec **Environment & Infrastructure** **Direct LP**		**SITE LOCATION PLAN** **PHASE I ENVIRONMENTAL SITE ASSESSMENT** **55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
Drawn: N/A	Scale: ~1:150 000	Date: JUL/13	Project No.: WX17199	Figure: A1



amec Environment & Infrastructure DIRECT LP		**SITE PLAN** **PHASE I ENVIRONMENTAL SITE ASSESSMENT** **55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
Drawn: N/A	Original Scale: Unknown	Date: JULY/2013	Project No.: WX17199	Figure: A2

APPENDIX B

STATEMENT OF LIMITATIONS

LIMITATIONS

1. The work performed in the preparation of this report and the conclusions presented are subject to the following:
   (a) The Standard Terms and Conditions which form a part of our Professional Services Contract;
   (b) The Scope of Services;
   (c) Time and Budgetary limitations as described in our Contract; and
   (d) The Limitations stated herein.
2. No other warranties or representations, either expressed or implied, are made as to the professional services provided under the terms of our Contract, or the conclusions presented.
3. The conclusions presented in this report were based, in part, on visual observations of the Site and attendant structures. Our conclusions cannot and are not extended to include those portions of the Site or structures, which are not reasonably available, in AMEC's opinion, for direct observation.
4. The environmental conditions at the Site were assessed, within the limitations set out above, having due regard for applicable environmental regulations as of the date of the inspection. A review of compliance by past owners or occupants of the Site with any applicable local, provincial or federal by-laws, orders-in-council, legislative enactments and regulations was not performed.
5. The Site history research included obtaining information from third parties and employees or agents of the owner. No attempt has been made to verify the accuracy of any information provided, unless specifically noted in our report.
6. Where testing was performed, it was carried out in accordance with the terms of our contract providing for testing. Other substances, or different quantities of substances testing for, may be present on Site and may be revealed by different or other testing not provided for in our contract.
7. Because of the limitations referred to above, different environmental conditions from those stated in our report may exist. Should such different conditions be encountered, AMEC must be notified in order that it may determine if modifications to the conclusions in the report are necessary.
8. The utilization of AMEC's services during the implementation of any remedial measures will allow AMEC to observe compliance with the conclusions and recommendations contained in the report. AMEC's involvement will also allow for changes to be made as necessary to suit field conditions as they are encountered.
9. This report is for the sole use of the party to whom it is addressed unless expressly stated otherwise in the report or contract. Any use which any third party makes of the report, in whole or the part, or any reliance thereon or decisions made based on any information or conclusions in the report is the sole responsibility of such third party. AMEC accepts no responsibility whatsoever for damages or loss of any nature or kind suffered by any such third party as a result of actions taken or not taken or decisions made in reliance on the report or anything set out therein.
10. This report is not to be given over to any third party for any purpose whatsoever without the written permission of AMEC.
11. Provided that the report is still reliable, and less than 12 months old, AMEC will issue a third-party reliance letter to parties that the client identifies in writing, upon payment of the then current fee for such letters. All third parties relying on AMEC's report, by such reliance agree to be bound by our proposal and AMEC's standard reliance letter. AMEC's standard reliance letter indicates that in no event shall AMEC be liable for any damages, howsoever arising, relating to third-party reliance on AMEC's report. No reliance by any party is permitted without such agreement.

APPENDIX C

AMEC ASSESSOR QUALIFICATIONS

AMEC Environment & Infrastructure

AMEC is a highly respected environmental, geotechnical, materials and water resource engineering firm supplying services to clients throughout North America and internationally. The Winnipeg office of AMEC provides specialist expertise in environmental and geotechnical projects, as well as materials testing, combining the best of local understanding, experience and depth, along with AMEC's global reach, experience and support. The Winnipeg AMEC office services the entire province of Manitoba and, if required, beyond the border into Saskatchewan and Northwest Ontario. The Environment & Infrastructure division in Winnipeg conducts over 100 Phase I ESAs each year. In addition the Winnipeg office has conducted over 1000 Phase II and III ESAs in Manitoba, all in accordance with the various and current Manitoba Conservation and CCME guidance documentation publicized over the years. The Winnipeg office of AMEC has a total of 30 full time and seasonal staff, of which nine are directly involved in the environmental field, and has experienced steady growth since opening in 1987. AMEC's Winnipeg office focuses on quality and timely project deliverables to our clients in the manufacturing, mining, commercial and public sectors.

John Donetz

Senior Environmental Scientist

Mr. Donetz is an Environmental Scientist with over thirty years of experience conducting environmental studies, EA and EIS evaluations and site assessments (ESA) for a variety of projects ranging from large scale hydro development to residential and industrial land Phase I, II and III evaluations. He is familiar with applicable federal, provincial, and local legislation and published guidelines throughout Canada and has worked with regulators in most provinces and territories. He has completed numerous ESAs including the $4 million eight mile channel remediation for Manitoba Hydro near Norway House in Manitoba, and over 50 studies for commercial realtors. Mr. Donetz specializes in aquatics and water quality issues.

Kerri-Lyn Szwaluk, M.Sc., P.Ag.

Senior Environmental Planner

Kerri-Lyn Szwaluk currently has 15 years of experience in land use planning, environmental assessments, environmental impact statements, and environmental protection plans. Throughout her work experience she has developed an extensive knowledge of hydro developments in Manitoba, and the oil and gas industry in Alberta. Kerri-Lyn has previously been responsible for project management and coordination of numerous pipelines and well sites. Over the last eleven years Kerri-Lyn has been involved with transmission line projects for Manitoba Hydro, with responsibilities such as route selection, preparing and submitting environmental impact statements for regulatory approval and assisting in the preparation of protection plans. In addition to Manitoba Hydro projects, Kerri-Lyn has also managed and assisted in the preparation of Environmental Assessments for transportation projects, the conversion of a tramway to and all weather road, floodway recreational opportunity concepts and a private golf course.

Angela Smith

Environmental Technician

Angela Smith has a Diploma in Environmental Protection Technology. She is an Environmental Technician with one year of experience conducting over 100 Phase I ESAs for a variety of properties including residential, agricultural, commercial and industrial land uses. She is familiar with applicable federal, provincial, and local legislation and published guidelines used to evaluate the actual or potential presence of contamination of the property.

APPENDIX D

SITE PHOTOGRAPHS

PHOTOGRAPH 1: Looking southwest across the Site from the northeast corner of the Site.

PHOTOGRAPH 2: Looking north across the site from the tailor storage area / loading dock area located southern portion of the Site.

amec **Environment & Infrastructure** **LP DIRECT**		**SITE PHOTOGRAPHS** **PHASE I ESA 55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
Drawn: N/A	Scale: N/A	Date: JULY/2013	Project No.: WX17199	Figure: D1

PHOTOGRAPH 3: Looking southwest across the Site from the northeast corner of the Site.

PHOTOGRAPH 4: Looking south showing the rail spur leading into the Site building.

amec **Environment & Infrastructure**		**SITE PHOTOGRAPHS** **PHASE I ESA 55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
LP DIRECT				
Drawn: N/A	Scale: N/A	Date: JULY/2013	Project No.: WX17199	Figure: D2

PHOTOGRAPH 5: Showing typical interior building materials observed in the office space located in the northwest corner of the Site building.

PHOTOGRAPH 6: Showing interior building materials observed in the warehouse area.

amec **Environment & Infrastructure** **LP DIRECT**		**SITE PHOTOGRAPHS** **PHASE I ESA 55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
Drawn: N/A	Scale: N/A	Date: JULY/2013	Project No.: WX17199	Figure: D3

PHOTOGRAPH 7: Showing the interior of the hazardous room.

PHOTOGRAPH 8: Showing the used oil storage tank located in the hazardous room.

amec **Environment & Infrastructure**		**SITE PHOTOGRAPHS** **PHASE I ESA 55 ROTHWELL ROAD** **WINNIPEG, MANITOBA**		
LP DIRECT				
Drawn: N/A	Scale: N/A	Date: JULY/2013	Project No.: WX17199	Figure: D4

PHOTOGRAPH 9: Showing interior building materials observed in the cross dock area.

PHOTOGRAPH 10: Showing the rail line located within the cross dock area of the Site building.

amec Environment & Infrastructure		**SITE PHOTOGRAPHS PHASE I ESA 55 ROTHWELL ROAD WINNIPEG, MANITOBA**		
LP DIRECT				
Drawn: N/A	Scale: N/A	Date: JULY/2013	Project No.: WX17199	Figure: D5

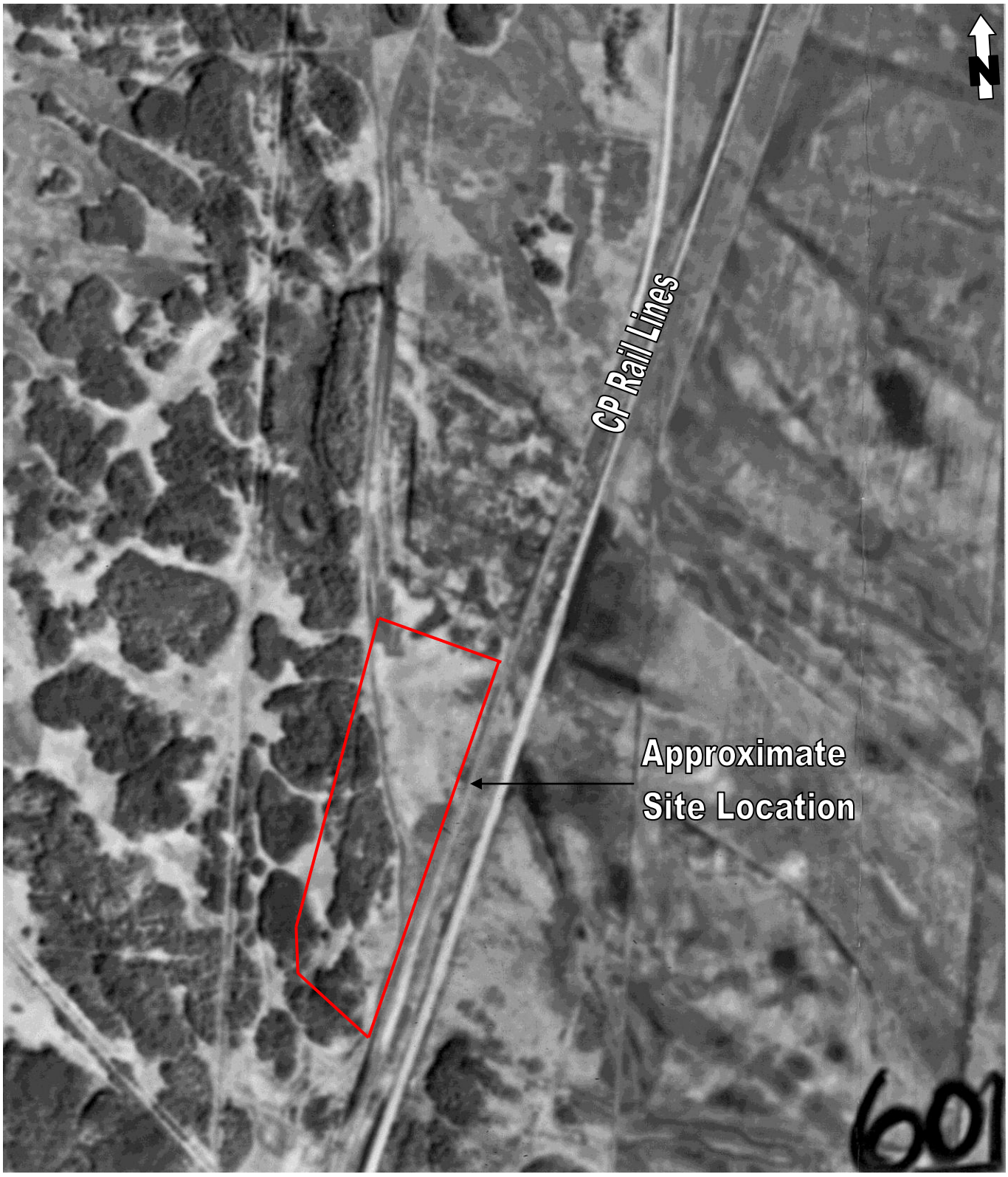
PHOTOGRAPH 11: Showing the interior building materials observed in the maintenance room. Also showing surface staining in the forklift maintenance area.

PHOTOGRAPH 12: Showing the chemical storage area for forklift maintenance equipment and supplies in the maintenance room.

amec **Environment & Infrastructure**		**SITE PHOTOGRAPHS PHASE I ESA 55 ROTHWELL ROAD WINNIPEG, MANITOBA**		
LP DIRECT				
Drawn: N/A	Scale: N/A	Date: JULY/2013	Project No.: WX17199	Figure: D6

APPENDIX E

AERIAL PHOTOGRAPHS



amec

Environment & Infrastructure

DIRECT LP

1960 AERIAL PHOTOGRAPH
PHASE I ENVIRONMENTAL SITE ASSESSMENT
55 ROTHWELL ROAD
WINNIPEG, MANITOBA

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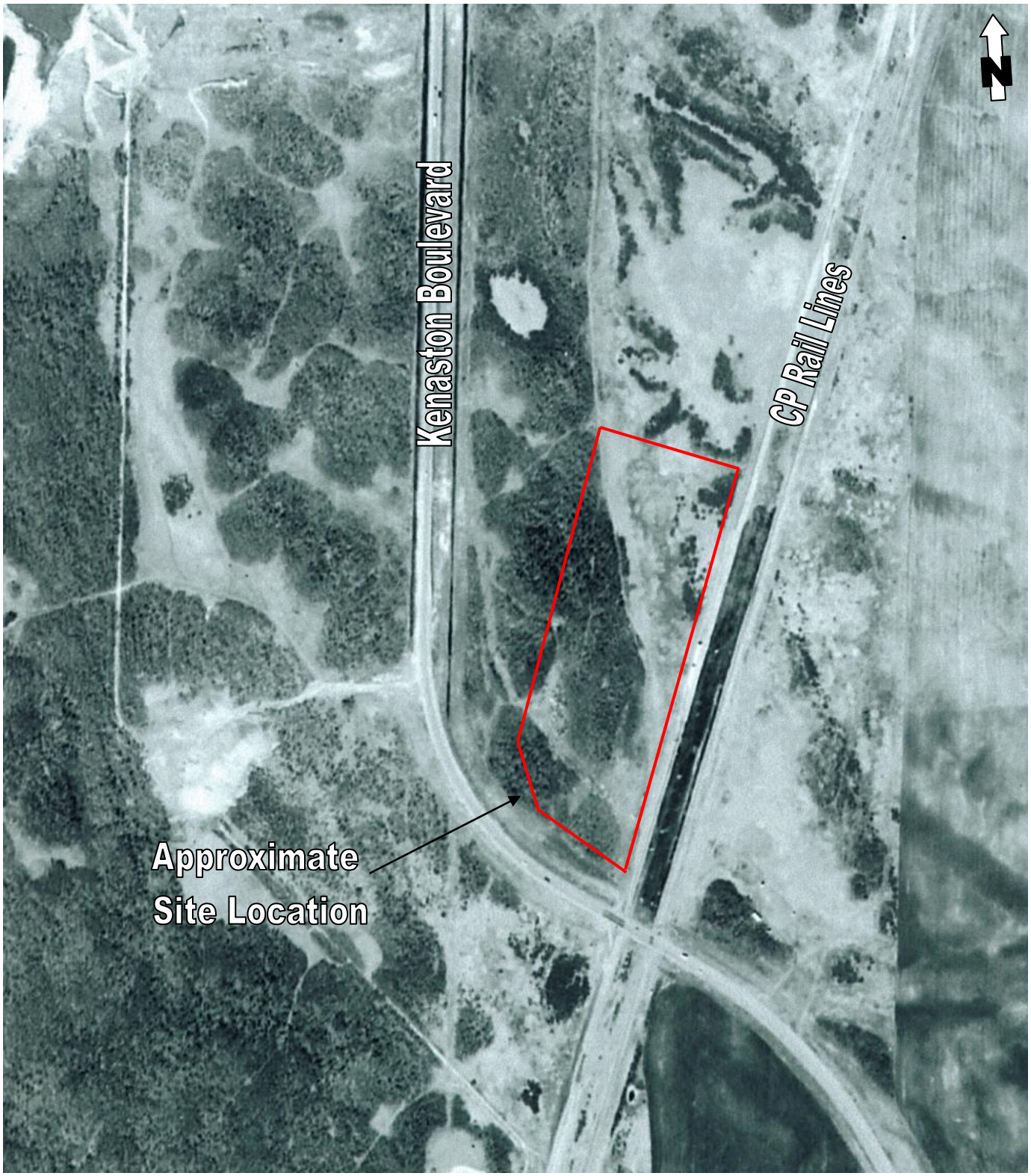

amec Environment & Infrastructure DIRECT LP		**1977 AERIAL PHOTOGRAPH PHASE I ENVIRONMENTAL SITE ASSESSMENT 55 ROTHWELL ROAD WINNIPEG, MANITOBA**		
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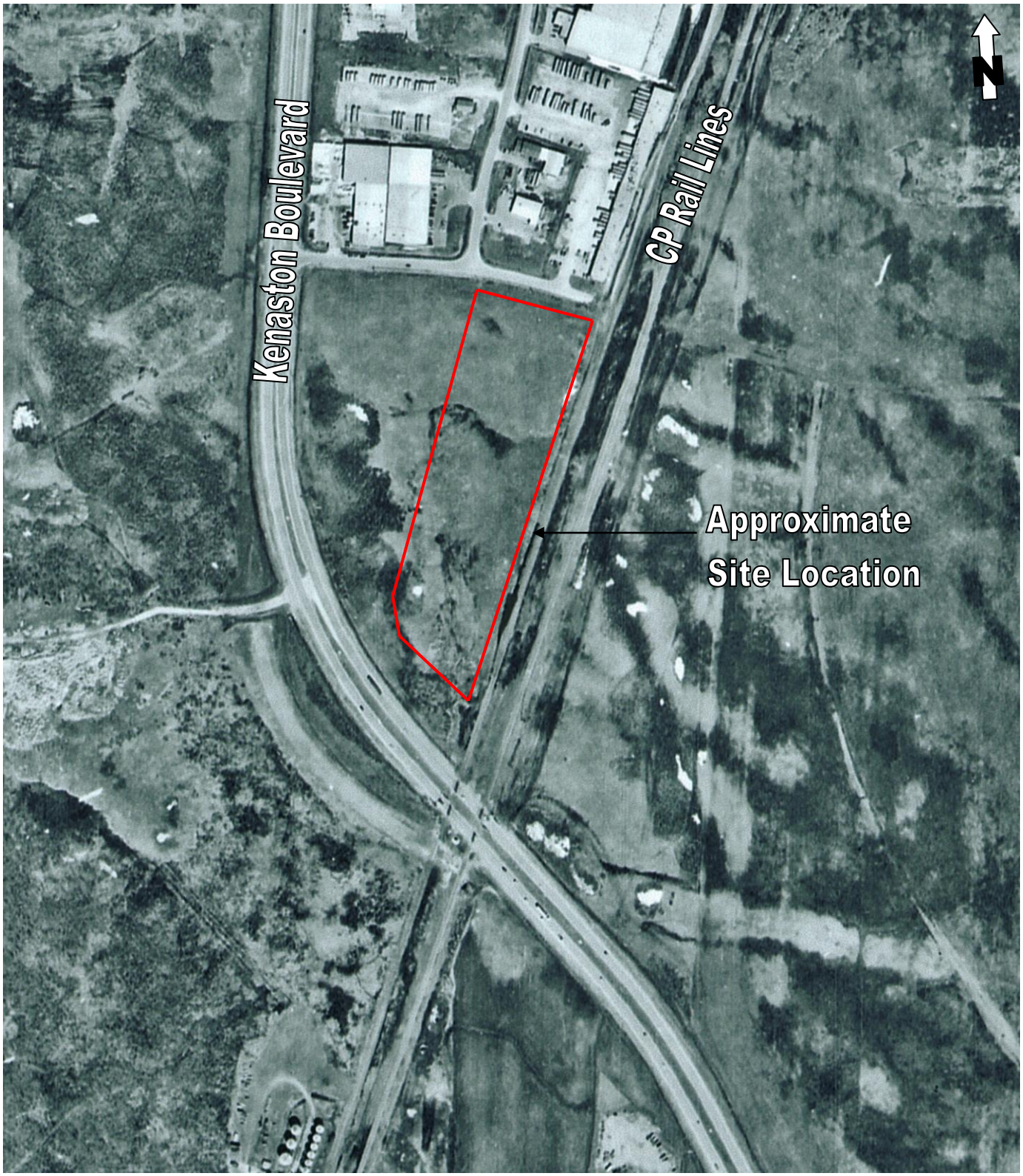


amec

Environment & Infrastructure

DIRECT LP

1997 AERIAL PHOTOGRAPH
PHASE I ENVIRONMENTAL SITE ASSESSMENT
55 ROTHWELL ROAD
WINNIPEG, MANITOBA

Drawn: N/A	Original Scale: 1: 20,000	Date: JULY/2013	Project No.: WX17199	Figure: E3

APPENDIX F

MC FILE SEARCH RESULTS LETTER

Manitoba
Conservation and Water Stewardship
Administration and Finance
200 Saulteaux Crescent, Box 85
Winnipeg, MB R3J 3W3
T 204-945-7098 F 204-945-2385
www.manitoba.ca

July 24, 2013
File # 14005

Ms. Angela Smith
AMEC Environment & Infrastructure
440 Dovercourt Drive,
Winnipeg, MB R3Y 1N4

Dear Ms. Smith:

Re: 55 Rothwell Road, Winnipeg, MB

Based on a review of our files, the Direct Distribution, listed at this address is an active hazardous waste generator of printing ink (UN1210), Isocyanates or solutions (UN2478), and batteries (UN2794).

There are no records of any outstanding work orders, licenses or environmental incidents found pertaining to the above-mentioned property. This site is not identified as an impacted or contaminated site in our files.

Yours truly,

Lorie Saflor
Administrative Services Clerk

Disclaimer attached
(GST registration # R107863847)

DISCLAIMER

Enclosed is the information requested with respect to your recent File Search Request. This response summarizes the information found in current records maintained by Manitoba Conservation and is for informational purposes only. No representation or responsibility is assumed whatsoever as to the completeness of this information as it related to the environmental condition or prior incidents associated with the property in question. In order to obtain more complete information on the property, persons may wish to retain the services of a qualified consultant for the purpose of conducting an environmental audit.

APPENDIX B

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

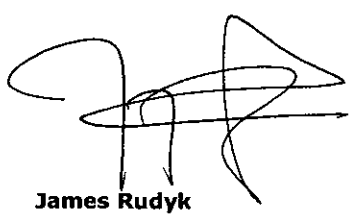
Direct

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 C

SPECIES OF CONSERVATION CONCERN

Table C1: 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 C2: 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

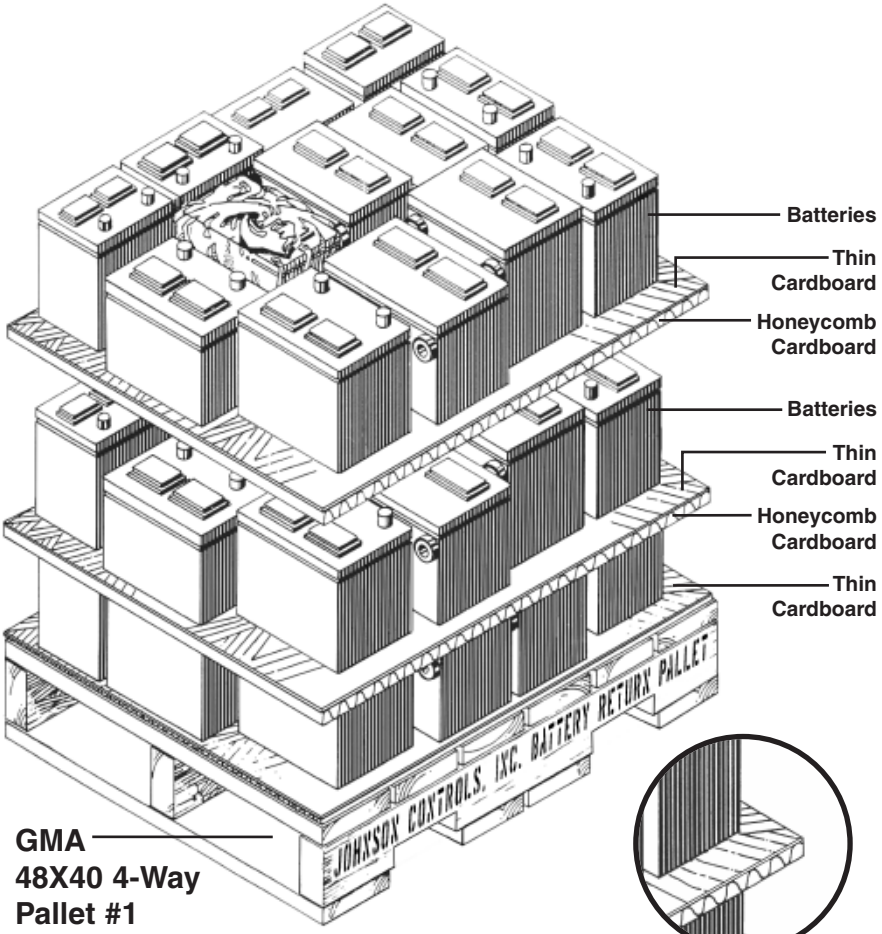
Manitoba Conservation. Wildlife Branch. Species Listed Under the *Manitoba Endangered Species Act* website accessed July 2013. https://www.gov.mb.ca/conservation/wildlife/sar/sarlist.html

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]

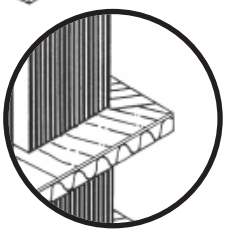
APPENDIX D

BATTERY CORE PROCEDURES

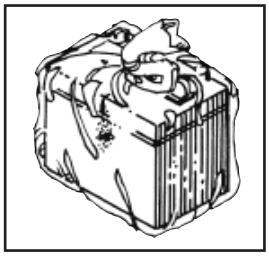
How To Properly Stack Used Batteries On Pallets



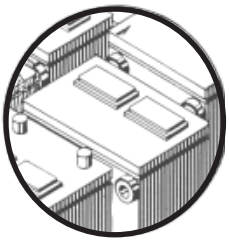
GMA 48X40 4-Way Pallet #1



Make sure there are no over hanging batteries.



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



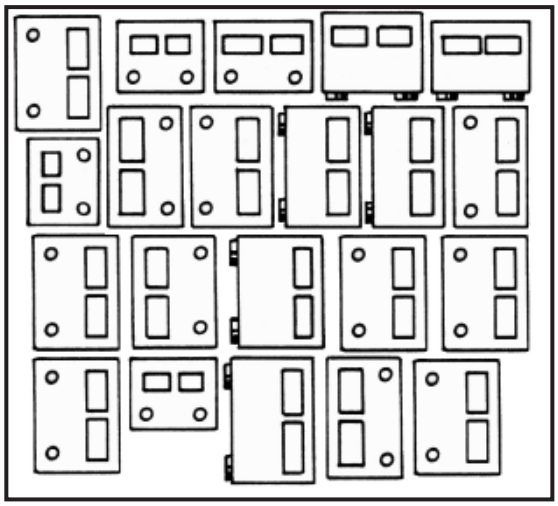
Correct

Incorrect

Arrange batteries to prevent terminals from touching each other.

Checklist

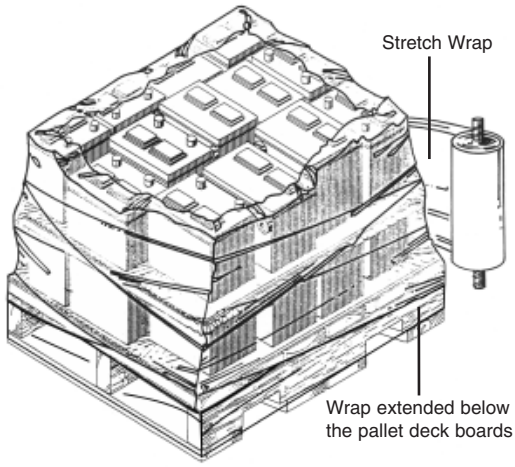
- ✔ A complete Johnson Controls, Inc. pallet is 3 layers with cardboard under all layers as illustrated above.
- ✔ No side terminals near each other
- ✔ No overhanging batteries
- ✔ Leaking batteries are bagged
- ✔ At least 7 wraps of 70 gauge stretch wrap tightly wrapped
- ✔ Wrap extended below the 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

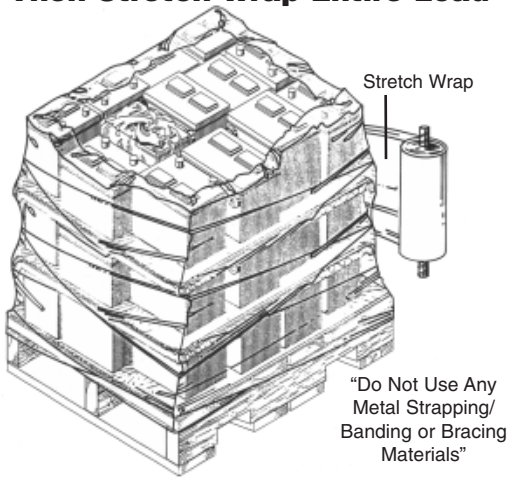
Load Batteries 2 Layers High, Then Stretch Wrap



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 E

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 2012

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	BEST TOWING	1-807-887-4357
COVERS:		1-800-417-1345

MARATHON/ GERALDTON/ LONGLAC/ THUNDER BAY

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:

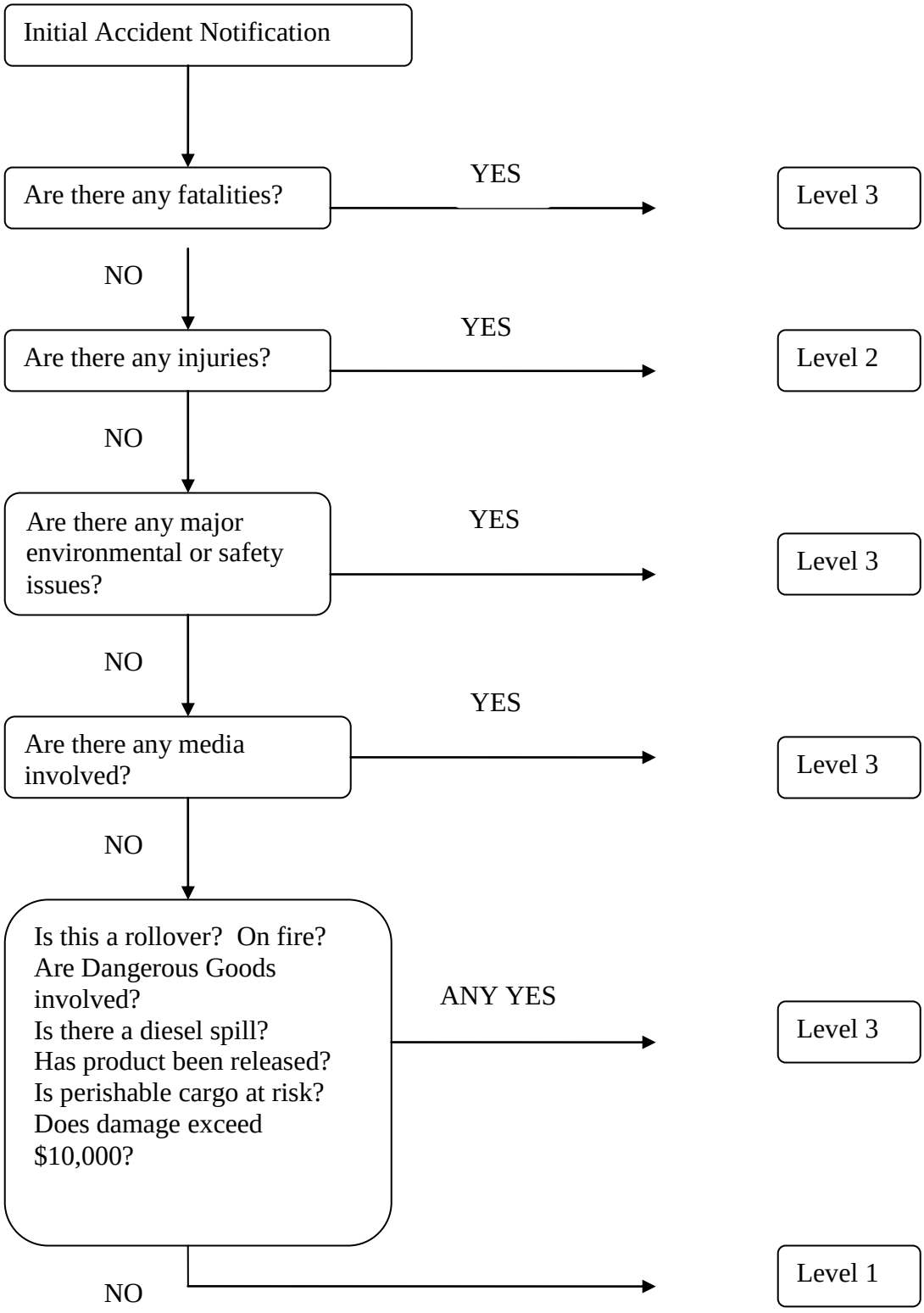
- Location
- Type of occurrence (vehicle accident, spill, leak, fire, etc.)
- Type and quantity of Dangerous Goods
- Severity of occurrence (volume of spill or leak, fire, injuries, etc.)
- Have local fire and police departments been notified
- Shippers and Receivers name and address
- Contact telephone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

Determining the Level of Severity and Response Requirements

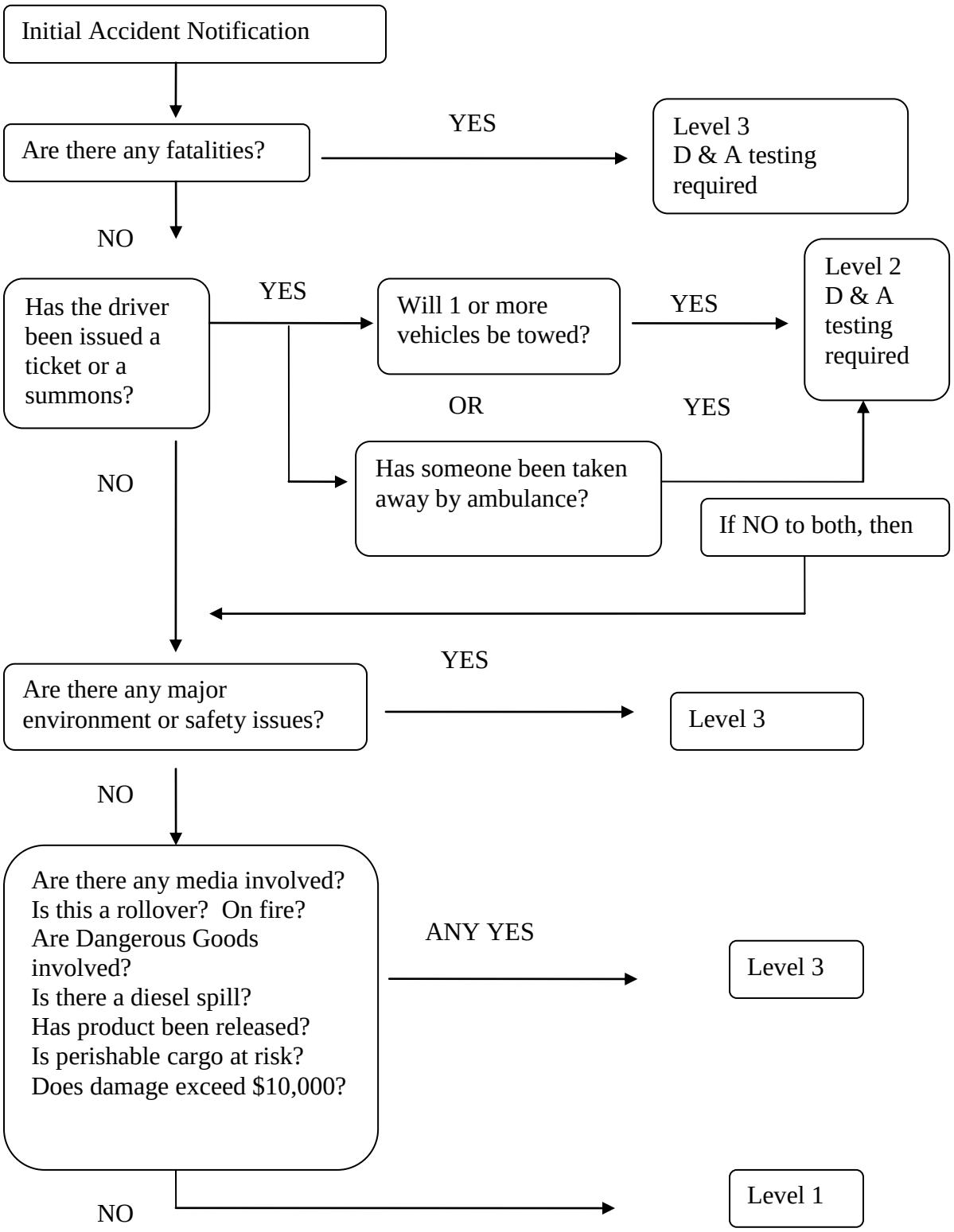
The list below provides quick reference to determining the appropriate level of response for each class and volume of dangerous goods. Please make reference to the Lass Event Procedure for details.

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 F

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

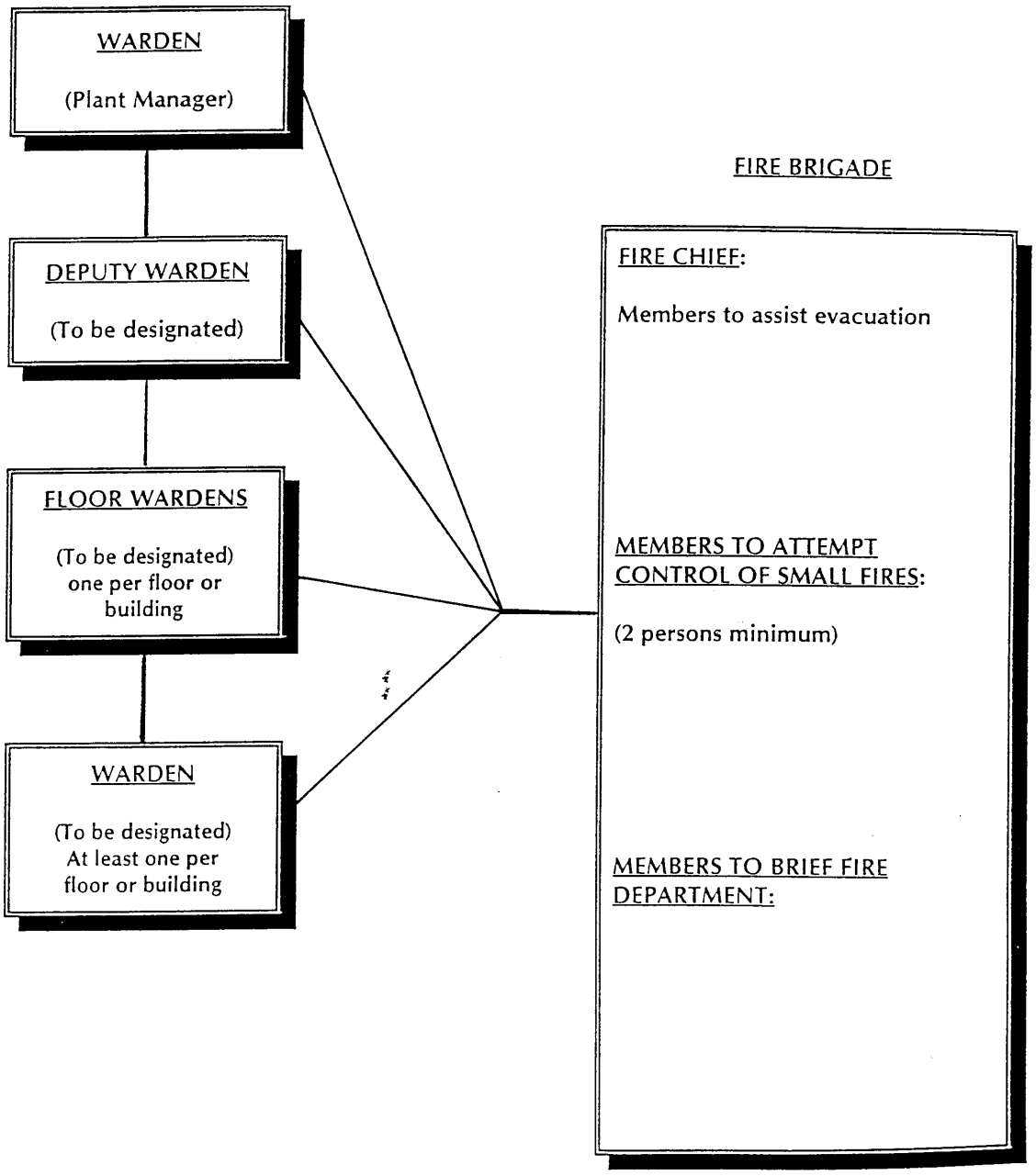
I. **Evacuation**

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.

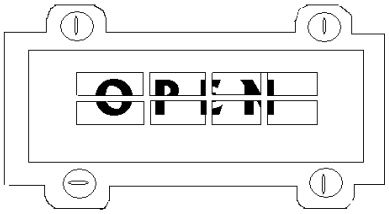
1. SPRINKLER CONTRL VALVES MUST BE OPEN.

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.

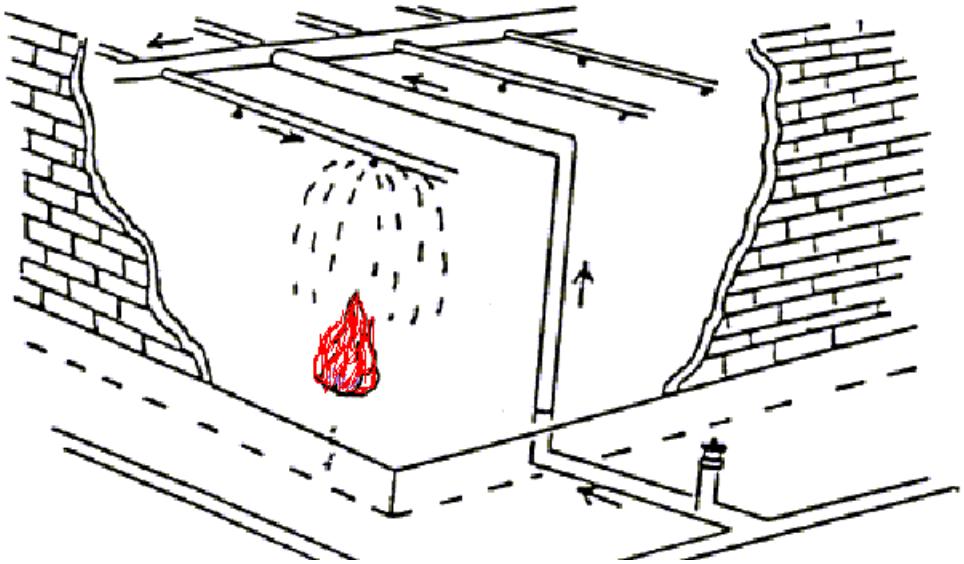
The next important stage in the sprinkler system is the Clapper valve and the devices connected to it. The clapper valve (1) sits on top of the main riser pipe and separates the water from the city main (2) from the water already in the system. The waster already in the system is kept under pressure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

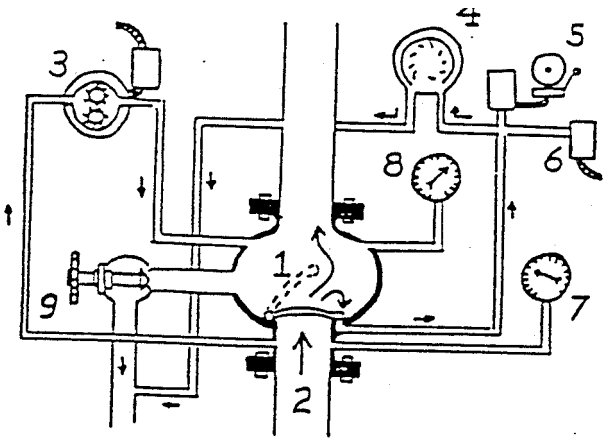
Step three begins as soon as the fire starts, even while the Fire Department is being called. Use the equipment in your warehouse to fight the fire before it even sets the sprinkler system off.

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

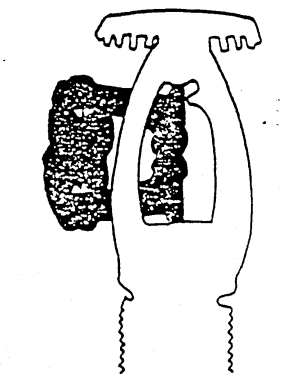
The lower gauge (7) shows the pressure of the water from the city main while the upper gauge (8) shows the pressure of the water in the system.

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

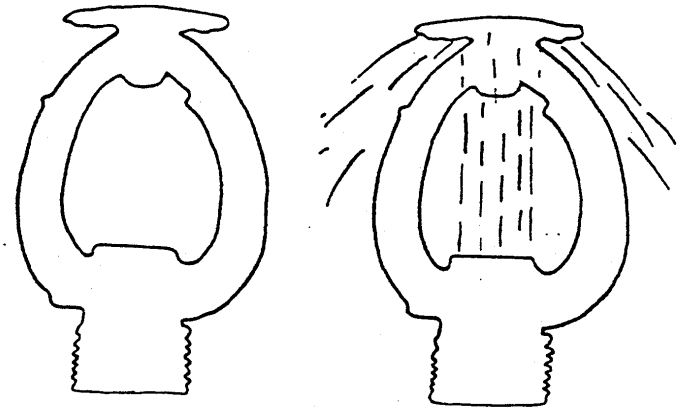


Above the Clapper valve the water is carried through pipes tot he ceiling where it enters the main sprinkler pipes. It then continues into smaller pipes organized in a grid and finally ends up at the sprinkler heads.

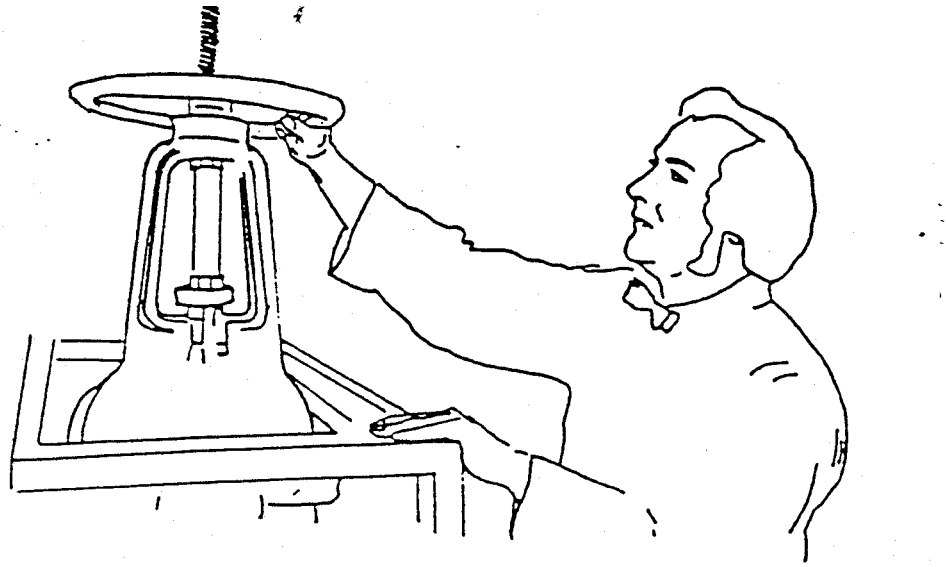
The sprinkler head consists of two parts. The body of the sprinkler head is what spreads the water when it is operating. In the centre is a fusible link that pops out when the temperature at the ceiling reaches 74 degrees Celsius.



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



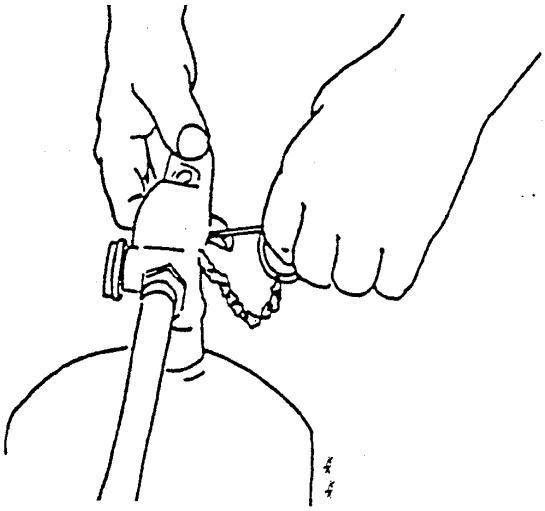
If a fire occurs, immediately send on of your employees to the sprinkler control valve. The employee should stand and make sure that the valve stays open until the Fire Chief tells him to close it. Naturally, he should not endanger his life in doing this task.



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.

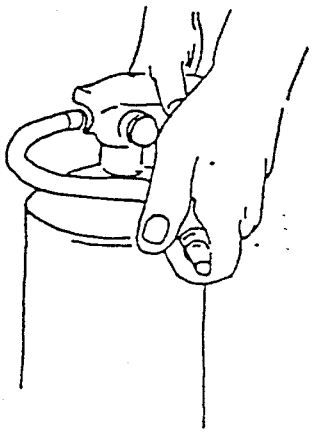
1. Determine the type of fire.
2. Select the right extinguisher.
3. Take the extinguisher off the stand and carry it to the fire.



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

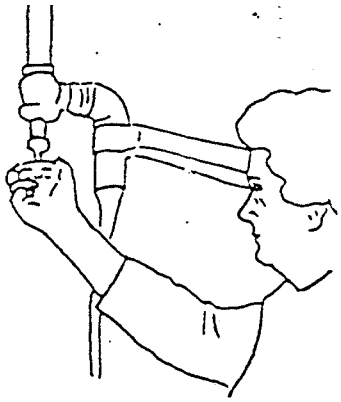
1. Pull the hose completely out of the rack before you turn the water on. If you do not pull it out first, the water under pressure may jam the hose in the rack.

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

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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.