



May 22, 2020
Project Number: 200375

Ms. Ariane Côté, Environmental Manager
Romney Energy Centre Limited Partnership
53 Jarvis Street, Ste 300
Toronto, ON M5C 2H2
E-mail: Ariane.Cote@edf-re.com

**Re: Review of Operator Procedures with Respect to Renewable Energy Approval
3397-AV3NVX, Condition K2
Sewage Works of the Transformer Substation Spill Containment Facility
Romney Wind Energy Centre**

Dear Ms. Côté:

BluMetric Environmental Inc. (BluMetric™) has prepared this letter for the Romney Wind Energy Centre (the "Project") following review of plans and procedures prepared by others to confirm that the Project is in conformance with Condition K2 (1) of the Renewable Energy Approval (REA) 3397-AV3NVX, related to the construction and operations of a transformer substation containment facility (the "facility"). The Project REA is provided as Attachment 1. It is the intention that this letter will be provided to the Ministry of Environment, Conservation, and Parks (the Ministry).

Prior to BluMetric's involvement, Wood Canada Limited (Wood), was retained to ensure conformance of the REA Conditions K2 (1)(a) and (b) related to the actual construction and design of the facility. The final letter report by Wood stamped by a Professional Engineer licensed in Ontario is provided in Attachment 2.

As such, the purpose of this letter is to review the following provided documents to Conditions K2 (1)(c) and (d) of the Project REA:

- Spill Prevention Control and Countermeasure (SPCC) Procedure prepared by EDF Renewable Services, Document # HSE-01-2356, dated February 2020, Revision 1; and
- Emergency Preparedness and Response Plan (EPRP) prepared by EDF Renewables, Document # EENA-OEMS-PR1201, dated January 2020, Revision 3.

Tel. 519-742-6685

BluMetric Environmental Inc.

Unit 3B, 209 Frederick Street, Kitchener, Ontario, Canada N2H 2M7

www.blumetric.ca



The SPCC and EPRP are provided in Attachments 3 and 4, respectively.

REA Conditions K 2(1)(c) and (d) specify:

(c) confirmation of the adequacy of the operating procedures and emergency procedures manuals as it pertains to the installed sewage works.

(d) procedures to provide emergency response to the site in the form of pumping and clean-up equipment within 24 hours after an emergency has been identified. Such response shall be provided even under adverse weather conditions to prevent further danger of material lost to the environment.

As detailed in the REA, Condition K2 pertains only to the Sewage Works of the Transformer Substation Spill Containment Facility for substation oil spills, and as such, the provided documentation was reviewed with respect to their adequacy to those sewage works.

The location of the Transformer Substation Spill Containment Facility is 5591 Richardson Side Road in Comber, Ontario. The substation contains a single 230 kV transformer. The substation's main transformer oil containment pit has an impervious concrete floor and walls. The floor is sloped towards a maintenance hole instrumented with a sump pump and an oil detection system. The sump pump discharges to a drainage ditch located on the east side of the substation. It is presumed that the sump pump does not operate if oil is detected in the maintenance hole.

This design, including containment sizing, and construction has been reviewed and approved by Wood (see Attachment 2).

BluMetric has referenced Ontario Regulation (O.Reg.) 224/07 – Spill Prevention and Contingency Plans and the Canadian Environmental Protection Act (CEPA) (1999) in the review of the procedures. BluMetric has reviewed the provided procedures with respect to the following details:

1. Prevention of an Emergency Situation
2. Preparation for an Emergency Situation
3. Response to an Emergency Situation
4. Recovery from and Emergency Situation

Adequacy of SPCC (EDF Renewables, February 2020)

BluMetric has confirmed that the SPCC procedure generally aligns with O.Reg. 224/07 and CEPA, as well as Conditions K2 1(c) and (d) of the Project REA. The SPCC specifically states the overall goal is to first prevent a spill, then ensure that there is appropriate equipment and training/ testing

in place to react to a spill, and it documents how to respond to a spill and finally the overall recovery from the spill. The SPCC identifies the types of spill to be related to petroleum hydrocarbons and assumes a worst-case scenario for a large spill of oil during a rainfall event. It is noted that Attachment 2 concludes that the worst-case scenario spill has been considered in the design and construction of the facility.

Specific to Condition K2 1(c), the SPCC covers the prevention, planning for, response to, and recovery of a spill at the facility. The posting of plans and the emergency contact list, as well as testing of the plan and training staff is detailed throughout. The SPCC also clearly identifies what is to be included in the spill kit based on spill kit location (i.e. facility or company vehicle). The location of two facility spill kits and an incident report form is provided in the appendix of the SPCC. In an email correspondence provided on May 12, 2020, the Project confirms that the SDS documents are available on site. In general, the SPCC is adequate to address the response to emergencies at the facility (sewage works).

Specific to Condition K2 1(d), the need to pump out and clean up the site within 24 hours of an emergency (spill), the Project confirmed in email correspondence provided on May 12, 2020, that the contractor retained for spill response is retained to respond within 24 hours of a spill. The SPCC details what the response is, who is responsible, and provides the contact information for a cleanup contractor. This spill response is dictated by the size of spill with small spill considered under 100 litres (L) and large spill considered to be greater than 100L. Disposal considerations post-spill are also detailed.

Adequacy of EPRP (EDF Renewables, January 2020)

BluMetric has confirmed that the EPRP documentation aligns with REA 3397-AV3MVX Conditions K2 1 (c) and (d). It is understood that this document applies to multiple sites and that the Romney Wind Energy Centre is only one of the sites that falls within its scope. The EPRP details its general purpose to prevent loss from a disaster, and details several potential emergency situations and the necessary response, including: fire, life threatening emergency medical, criminal behavior, severe weather, monitoring and response procedures, and environmental (specific to spills).

Specific to Condition K2 1(c), the EPRP covers the legal requirements set forth at the facility (i.e. OSHA 1910.8 Emergency Action Plan Requirements, Canada Occupational Health and Safety Regulations, CSZ Z731-03 (R2014) – Emergency Preparedness and Response Standard, NFPA 1, Fire Code, NFPA 10 – Portable Fire Extinguishers, and Ontario Occupational Health and Safety Act). The evacuation procedure is detailed, and an evacuation plan is provided in the appendix of the EPRP. Similar to the SPCC, the EPRP is adequate to address the response to emergencies at the facility (sewage works).

Specific to Condition K2 1(d), the required timing of response to a spill at the facility was confirmed by the Project in email correspondence on May 12, 2020. The Project confirms that the contractor retained for spill response is retained to respond within the required timeframe.

CONCLUSION

Attachment 2 provides a letter report by Wood that specifically states that the actual construction and design of the facility conform with Conditions K2 (1)(a) and (b) of the Project REA.

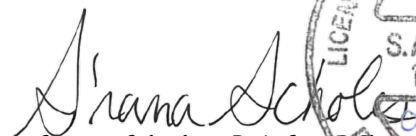
BluMetric has reviewed the SPCC and EPRP provided in Attachments 3 and 4 respectively and finds them generally adequate in their planning for and response to emergency situations, and specifically to the spill situation with conformance to Condition K2 1(c) for the Project REA. The Project confirms that the contractor retained for spill response has been retained to respond within the required timeframe which conforms to Condition K2 1(d) of the Project REA.

CONFIDENTIALITY

All information, data, material, etc. gathered as a part of this study shall be treated as confidential and shall only be discussed with DNV GL – Energy and the Project unless otherwise directed. All queries on the Project from the public, news media, etc. will be referred to DNV GL – Energy and the Project. No contacts will be made to any third party without the full knowledge and approval of DNV GL – Energy and the Project.

Regards,

BluMetric Environmental Inc.


S'rana Scholes, B.A.Sc., P. Eng.
Environmental Engineer/ Project Manager




Michael J. Duchene, M.A.Sc., P. Eng.
Senior Engineer



Encl.

Ref: 200375 DNVGL - REA Review Letter_FINAL.docx

ATTACHMENT 1

Renewable Energy Approval 3397-AV3NVX

RENEWABLE ENERGY APPROVAL

NUMBER 3397-AV3MVX
Issue Date: April 16, 2018

Romney Energy Centre GP Inc., as general partner for and
on behalf of Romney Energy Centre Limited Partnership
53 Jarvis Street, Suite 300
Toronto, ON
M5C 2H2

Project Location: Romney Wind Energy Centre
Municipality of Chatham-Kent
Town of Lakeshore, Essex County

You have applied in accordance with Section 47.4 of the Environmental Protection Act for approval to engage in a renewable energy project in respect of a Class 4 wind facility consisting of the following:

- the construction, installation, operation, use and retiring of a Class 4 wind facility with a total name plate capacity of up to 60 megawatts (MW).

For the purpose of this renewable energy approval, the following definitions apply:

1. "Acoustic Assessment Report" means the report included in the Application and entitled "Romney Wind Energy Centre, Renewable Energy Approval Application - Noise Impact Assessment, Romney Energy Centre Limited Partnership; Document No.: 10021083-CAMO-R-01, Issue: G, Status: Final, Dated: 17 January 2018", prepared by DNV-GL and signed by S. Dokouzian;
2. "Acoustic Audit - Emission" means an investigative procedure that is compliant with the CAN/CSA Standard 61400-11 and consisting of measurements and/or acoustic modelling of noise emissions produced by wind turbine generators, assessed to determine compliance with the manufacturer's noise (acoustic) equipment specifications and emission data of the wind turbine generators, included in the Acoustic Assessment Report;
3. "Acoustic Audit - Immission" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the Equipment, assessed to determine compliance with the Noise Performance Limits set out in this Approval;

4. "Acoustic Audit Report-Emission" means a report presenting the results of the Acoustic Audit - Emission;
5. "Acoustic Audit Report-Immission" means a report presenting the results of the Acoustic Audit - Immission;
6. "Acoustic Audit - Transformer Substation" means an investigative procedure that is compliant with the IEEE Standard C57.12.90 consisting of measurements and/or acoustic modelling of all noise sources comprising the transformer substation assessed to determine compliance with the Sound Power Level specification of the transformer substation described in the Acoustic Assessment Report;
7. "Acoustic Audit Report - Transformer Substation" means a report presenting the results of the Acoustic Audit - Transformer Substation;
8. "Acoustical Consultant" means a person currently active in the field of environmental acoustics and noise/vibration control, who is knowledgeable about Ministry noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from wind facilities;
9. "Acoustically Equivalent Wind Turbine" means a wind turbine with the same or lower octave band sound power levels, tonal audibility values, and predicted noise impact levels at receptor(s) as the Reference Wind Turbine(s).
10. "Act" means the *Environmental Protection Act*, R.S.O 1990, c.E.19, as amended;
11. "Adverse Effect" has the same meaning as in the Act;
12. "Application" means the application for a Renewable Energy Approval dated July 24, 2017, and signed by Stephane Desdunes, Director, Romney Energy Centre Limited Partnership, and all supporting documentation submitted with the application, including amended documentation submitted up to April 16, 2018;
13. "Approval" means this Renewable Energy Approval issued in accordance with Section 47.4 of the Act, including any schedules to it;
14. "A-weighting" means the frequency weighting characteristic as specified in the International Electrotechnical Commission (IEC) Standard 61672, and intended to approximate the relative sensitivity of the normal human ear to different frequencies (pitches) of sound. It is denoted as "A";
15. "A-weighted Sound Pressure Level" means the Sound Pressure Level modified by application of an A-weighting network. It is measured in decibels, A-weighted, and denoted "dBA";
16. "CAN/CSA Standard 61400-11" means the "Wind turbine generator systems – Part 11: Acoustic noise measurement techniques";

17. "Class 1 Area" means an area with an acoustical environment typical of a major population centre, where the background sound level is dominated by the activities of people, usually road traffic, often referred to as "urban hum";
18. "Class 2 Area" means an area with an acoustical environment that has qualities representative of both Class 1 and Class 3 Areas:
 1. sound levels characteristic of Class 1 during daytime (07:00 to 19:00 or to 23:00 hours);
 2. low evening and night background sound level defined by natural environment and infrequent human activity starting as early as 19:00 hours (19:00 or 23:00 to 07:00 hours);
 3. no clearly audible sound from stationary sources other than from those under impact assessment.
19. "Class 3 Area" means a rural area with an acoustical environment that is dominated by natural sounds having little or no road traffic, such as the following:
 1. a small community with less than 1000 population;
 2. agricultural area;
 3. a rural recreational area such as a cottage or a resort area; or
 4. a wilderness area.
20. "Company" means Romney Energy Centre GP Inc., as general partner for and on behalf of Romney Energy Centre Limited Partnership, a partnership under the laws of Ontario, and includes its successors and assignees;
21. "Compliance Protocol for Wind Turbine Noise" means the Ministry document entitled, Compliance Protocol for Wind Turbine Noise, Guideline for Acoustic Assessment and Measurement, April 2017;
22. "Decibel" means a dimensionless measure of Sound Level or Sound Pressure Level, denoted as dB;
23. "Director" means a person appointed in writing by the Minister of the Environment pursuant to section 5 of the Act as a Director for the purposes of section 47.5 of the Act;
24. "District Manager" means the District Manager of the appropriate local district office of the Ministry where the Facility is geographically located;
25. "Equipment" means the eighteen (18) wind turbine generators and one (1) transformer substation, identified in this Approval and as further described in the Application, to the extent approved by this Approval;

26. "Equivalent Sound Level" is the value of the constant sound level which would result in exposure to the same total A-weighted energy as would the specified time-varying sound, if the constant sound level persisted over an equal time interval. It is denoted L_{eq} and is measured in dB A-weighting (dBA);
27. "Facility" means the renewable energy generation facility, including the Equipment, as described in this Approval and as further described in the Application, to the extent approved by this Approval;
28. "IEEE Standard C57.12.90" means the IEEE Standard Test Code for Liquid-Immersed Distribution, Power, and Regulating Transformers;
29. "Independent Acoustical Consultant" means an Acoustical Consultant who is not representing the Company and was not involved in preparing the Acoustic Assessment Report. The Independent Acoustical Consultant shall not be retained by the Acoustical Consultant involved in the noise impact assessment;
30. "Ministry" means the ministry of the government of Ontario responsible for the Act and includes all officials, employees or other persons acting on its behalf;
31. "Noise Guidelines for Wind Farms" means the Ministry document entitled "Noise Guidelines for Wind Farms", dated May 2016, PIBS 9900e, as amended;
32. "Noise Receptor" has the same meaning as in O. Reg. 359/09;
33. "O. Reg. 359/09" means Ontario Regulation 359/09 "Renewable Energy Approvals under Part V.0.1 of the Act" made under the Act;
34. "Point of Reception" has the same meaning as in the Noise Guidelines for Wind Farms and is subject to the same qualifications described in that document;
35. "Project Location" has the same meaning as in O. Reg. 359/09;
36. "Professional Engineer" has the same meaning as in O. Reg. 359/09;
37. "Publication NPC-233" means Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October 1995;
38. "Reference Wind Turbines" for this Approval are the turbines described in section 4.1 of the Acoustic Assessment Report:
 1. Vestas V136 STE, 3.60 MW Mode P01 STE {maximum sound power level 106 dBA},
 2. Vestas V136 STE, 3.45 MW Mode S01 STE {maximum sound power level 104.9 dBA}, and

3. Vestas V136 STE , 3.45 MW Mode S02 STE {maximum sound power level 104.0 dBA}
39. "Qualified Inspector" means a person with training and/or experience in erosion and sediment control, stormwater management, and surface water monitoring not representing the Company who was not involved in preparing the stormwater management and erosion and sediment control plans;
40. "Sound Level" means the A-weighted Sound Pressure Level;
41. "Sound Level Limit" is the limiting value described in terms of the one hour A-weighted Equivalent Sound Level L_{eq} ;
42. "Sound Power Level" means ten times the logarithm to the base of 10 of the ratio of the sound power (Watts) of a noise source to standard reference power of 10^{-12} Watts;
43. "Sound Pressure" means the instantaneous difference between the actual pressure and the average or barometric pressure at a given location. The unit of measurement is the micro pascal (μPa);
44. "Sound Pressure Level" means twenty times the logarithm to the base 10 of the ratio of the effective pressure (μPa) of a sound to the reference pressure of 20 μPa ;
45. "UTM" means Universal Transverse Mercator coordinate system.
46. "Wind Turbine Specifications Checklist" means a document which summarizes the parameters of the Acoustically Equivalent Wind Turbine. The document is available at <https://files.ontario.ca/moecc-20-wind-specifications.docx> .
47. "Wind Turbine Specifications Report" means a document which details the parameters of the Acoustically Equivalent Wind Turbine and at a minimum contains the information specified in the Wind Turbine Specifications Checklist.

You are hereby notified that this approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

A – GENERAL

- A1. The Company shall construct, install, use, operate, maintain and retire the Facility in accordance with the terms and conditions of this Approval and the Application and in accordance with the following schedules attached hereto:

Schedule A - Facility Description

Schedule B - Coordinates of the Equipment and Noise Specifications

Schedule C - Noise Control Measures

- A2. Where there is a conflict between a provision of this Approval and any document submitted by the Company, the conditions in this Approval shall take precedence. Where there is a conflict between one or more of the documents submitted by the Company, the document bearing the most recent date shall take precedence.
- A3. The Company shall ensure a copy of this Approval is:
- (1) accessible, at all times, by Company staff operating the Facility and;
 - (2) submitted to the clerk of each local municipality and upper-tier municipality in which the Facility is situated.
- A4. If the Company has a publicly accessible website, the Company shall ensure that:
- (1) this Approval, the Application, and any amendments to this Approval or the Application, are posted on the Company's publicly accessible website within five (5) business days of the date this Approval is issued or amended;
 - (2) any technical report(s) required to be prepared by a condition of this Approval is posted on the Company's publicly accessible website within five (5) business days of the date the report(s) is prepared, subject to the redaction of any personal, commercially sensitive or proprietary information, as deemed appropriate by the Ministry; and
 - (3) all of the documentation described in Conditions A4(1) and A4(2) remains posted on the Company's publicly accessible website for the life of the Facility.
- A5. The Company shall, at least six (6) months prior to the anticipated retirement date of the entire Facility, or part of the Facility, review the report included in the Application and entitled "Decommissioning Plan Report" dated July 27, 2017, and prepared by DNV GL, to ensure that it is still accurate. If the Company determines that the Facility cannot be decommissioned in accordance with the "Decommissioning Plan Report" dated July 27, 2017, and prepared by DNV GL, the Company shall provide the Director and District Manager a written description of plans for the decommissioning of the Facility.
- A6. The Facility shall be retired in accordance with the report included in the Application and entitled "Decommissioning Plan Report" dated July 27, 2017, and prepared by DNV GL, and any directions provided by the Director or District Manager.
- A7. The Company shall provide the District Manager and the Director at least ten (10) days written notice of the following:
- (1) the commencement of any construction or installation activities at the Project Location; and
 - (2) the commencement of the operation of the Facility.

- A8. The Company shall, at least six (6) months prior to the anticipated retirement date of the entire Facility, or part of the Facility, contact the ministry responsible for agriculture in Ontario at that time to discuss its plans for the decommissioning of the Facility, and follow any directions provided by that ministry in respect of the Company's plans to restore the Project Location to its previous agricultural capacity.
- A9. As described in Schedule A of the Approval the Company shall not construct or operate more than seventeen (17) out of the eighteen (18) wind turbine generators identified in the Schedule B of the Approval;
- A10. If Acoustically Equivalent Wind Turbines are utilized in the Facility then:
- (1) at least three (3) months prior to the delivery of the first Equipment component to the site of the Facility or such other date as agreed to in writing by the Director, a Wind Turbine Specifications Checklist confirming the actual equipment make/model, must be submitted to the Director and the District Manager for review and Director's written approval;
 - (2) at least three (3) months prior to the delivery of the first Equipment component to the site of the Facility or such other date as agreed to in writing by the Director, the following documents must be submitted to the Director and the District Manager for review and Director's written approval:
 - (a) a Wind Turbine Specifications Report;
 - (b) an IEC 61400-11 test report(s) confirming the chosen turbine is acoustically equivalent to the approved Reference Wind Turbine; and
 - (c) a summary containing updated tables 7-1, 7-2, 7-3, 7-4 and 7-5 of the Acoustic Assessment Report.

B – EXPIRY OF APPROVAL

- B1. Construction and installation of the Facility must be completed within three (3) years of the later of:
- (1) the date this Approval is issued; or
 - (2) if there is a hearing or other litigation in respect of the issuance of this Approval, the date that this hearing or litigation is disposed of, including all appeals.
- B2. This Approval ceases to apply in respect of any portion of the Facility not constructed or installed before the later of the dates identified in Condition B1.

C – NOISE PERFORMANCE LIMITS

- C1. The Company shall ensure that:

- (1) the Sound Levels from the Equipment, at the Points of Reception identified in the Acoustic Assessment Report, comply with the Sound Level Limits set in the Noise Guidelines for Wind Farms, as applicable, and specifically as stated in the table below:

Wind Speed (m/s) at 10 m height	at or below 4	5	6	7	8	9	10
Sound Level Limits, dBA	40.0	40.0	40.0	43.0	45.0	49.0	51.0

- (2) the Equipment is constructed and installed at either of the following locations:
- (a) at the locations identified in Schedule B of this Approval; or
 - (b) at a location that does not vary by more than 10 metres from the locations identified in Schedule B of this Approval and provided that,
 - (i) the Equipment will comply with Condition C1(1); and
 - (ii) all setback prohibitions established under O. Reg. 359/09 are complied with.
- (3) the Equipment complies with the noise specifications set out in Schedule B of this Approval.
- C2. If the Company determines that some or all of the Equipment cannot be constructed in accordance with Condition C1(2), prior to the construction and installation of the Equipment in question, the Company shall apply to the Director for an amendment to the terms and conditions of the Approval.
- C3. Within three (3) months of the completion of the construction of the Facility, the Company shall submit to the Director a written confirmation signed by an individual who has the authority to bind the Company that the UTM coordinates of the "as constructed" Equipment comply with the requirements of Condition C1(2).
- C4. Prior to construction and installation of the transformer substation the Company shall submit to the Director a written confirmation signed by an individual who has the authority to bind the Company that the subject transformer sound power levels, determined fully in accordance with the IEEE Standard C57.12.90-2010, do not exceed the maximum sound power levels specified in the Schedule B of the Approval.

D – CONFIRMATION OF VACANT LOT NOISE RECEPTORS

- D1. The locations identified as vacant lot receptor in Appendix A of the Acoustic Assessment Report are specified as Noise Receptors for the purposes of subsection 54 (1.1) of O. Reg. 359/09 and subsection 35 (1.0.1) of O. Reg. 359/09.

E – ACOUSTIC AUDIT - IMMISSION

- E1. The Company shall carry out an Acoustic Audit - Immission of the Sound Levels produced by the operation of the Equipment in accordance with the following:

- (1) the acoustic audit measurements shall be undertaken in accordance with Part D of the Compliance Protocol for Wind Turbine Noise, {all data including Supervisory Control and Data Acquisition data (SCADA) from the subject turbines is to be documented in one (1) minute intervals unless prior to the measurements another interval is agreed to in writing by the Director};
- (2) the acoustic audit measurements shall be performed by an Independent Acoustical Consultant on two (2) separate occasions at five (5) different Points of Reception that represent the location of the greatest predicted noise impacts, i.e., the highest predicted Sound Levels, and that are located in the direction of prevailing winds from the Facility;
- (3) if any of the five (5) Points of Reception cannot be selected on the basis of the criteria described in Condition E1(2) due to access restrictions or for any other reason, the Company must select alternate Points of Reception or locations (other than a Point of Reception), and must provide a clear written explanation to the Director and District Manager prior to undertaking the acoustic audit measurements as to why the criteria described in Condition E1(2) could not be met and the basis for selecting the alternate Points of Reception or locations. The Company must obtain the written agreement of the Director, and follow any directions provided, for the use of these alternate Points of Reception or locations prior to proceeding with the acoustic audit measurements.

E2. The Company shall submit to the Director and the District Manager an Acoustic Audit Report - Immission, prepared by an Independent Acoustical Consultant, at the following points in time:

- (1) no later than twelve (12) months after the commencement of the operation of the Facility, or such other date as agreed to in writing by the Director, for the first of the two (2) acoustic audit measurements at the five (5) different Points of Reception; and
- (2) no later than eighteen (18) months after the commencement of the operation of the Facility, or such other date as agreed to in writing by the Director, for the second of the two (2) acoustic audit measurements at the five (5) different Points of Reception.

E3. The Company shall carry out an Acoustic Audit - Transformer Substation and shall submit to the Director and the District Manager an Acoustic Audit Report – Transformer Substation prepared by an Independent Acoustical Consultant, in accordance with Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended, and no later than six (6) months after the commencement of the operation of the Facility.

E4. In addition to the requirements described in Condition E3, the Acoustic Audit - Transformer Substation must include a compliance summary of the measurement results and the transformer sound data contained in the Acoustic Assessment Report. The following items must be included in the compliance summary:

- (1) transformer sound power levels (overall level and frequency spectra in octave bands); and

- (2) a statement that the transformer overall A-weighted sound power levels do not exceed the maximum sound power levels specified in the Schedule B of the Approval.

F – ACOUSTIC AUDIT- EMISSION

- F1. The Company shall carry out an Acoustic Audit - Emission of the acoustic emissions produced by the operation of the wind turbine generators in accordance with the following:
- (1) the acoustic emission measurements shall be undertaken in accordance with the CAN/CSA Standard C61400-11:07;
 - (2) the acoustic emission measurements shall be performed by an Independent Acoustical Consultant; and
 - (3) the acoustic emission measurements shall be performed on one (1) of each type / model of the following wind turbine generator(s):
 - (a) Vestas V136 3.60 MW, Mode P01 STE;
 - (b) Vestas V136 3.45 MW, Mode S01 STE; and
 - (c) Vestas V136 3.45 MW, Mode S02 STE;and/or Acoustically Equivalent Turbine(s) in the Facility.
- F2. The Company shall submit to the Director and the District Manager an Acoustic Audit Report-Emission, prepared in accordance with Section 9 of the CAN/CSA Standard C61400-11 by an Independent Acoustical Consultant, no later than twelve (12) months after the commencement of the operation of the Facility, or such other later date as agreed to in writing by the Director.
- F3. In addition to the requirements described in Condition F2, the Acoustic Audit Report-Emission must include a summary of the measurement results corresponding to the Maximum Sound Power Levels (dBA) shown in Schedule B. The purpose of the summary is to confirm the noise specifications of the wind turbine generators with specifications included in the Application. The following items must be included in the summary:
- (1) sound power levels (overall levels and frequency spectra in octave bands for each wind speed) of the wind turbine generators;
 - (2) tonal audibility values (for each wind speed) of the wind turbine generators;
 - (3) a statement that the measured overall A-weighted sound power levels of wind turbine generators, do not exceed the values of the Maximum Sound Power Level (dBA) shown in Schedule B of the Approval with consideration that Part E of the Compliance Protocol for Wind Turbine Noise will be used to evaluate compliance of the Facility; and

- (4) a statement commenting on the measured wind turbine generators tonal audibility values, as per Condition F3(2), and the maximum tonal audibility value noted in the Acoustic Assessment Report with consideration that Part E of the Compliance Protocol for Wind Turbine Noise will be used to evaluate compliance of the Facility.

G – WATER TAKING ACTIVITIES

- G1. The Company shall carry out water taking activities in accordance with the report included in the Application and entitled "Hydrogeological Assessment and Effects Assessment", dated October 18, 2017, and prepared by DNV GL.
- G2. The Company shall implement any proposed mitigation measures, contingency measures, and monitoring described in the report included in the Application and entitled "Hydrogeological Assessment and Effects Assessment", dated October 18, 2017, and prepared by DNV GL

H – STORMWATER MANAGEMENT AND EROSION AND SEDIMENT CONTROL

- H1. The Company shall employ best management practices for stormwater management and erosion and sediment control during construction, installation, use, operation, maintenance and retiring of the Facility.
- H2. The Company shall prepare a detailed, site-specific stormwater management and erosion and sediment control plan for the construction, installation, use, operation and maintenance of the Facility, and submit the plan to the Director prior to the commencement of construction of the Facility.
- H3. The stormwater management and erosion and sediment control plan shall be prepared by a qualified Professional Engineer and shall:
 - (1) include details related to site-specific erosion and sediment control measures (including measures to address any construction dewatering discharge), stormwater management measures, contingency measures, monitoring, monitoring frequency, and the requirement for a Qualified Inspector to do the monitoring; and
 - (2) comply with the Ministry's Guideline B-6 "Guidelines for Evaluating Construction Activities on Water Resources", January 1995; "Stormwater Management Planning and Design Manual", March 2003; and "Erosion and Sediment Control Guideline for Urban Construction, as Compiled by the Greater Golden Horseshoe Conservation Authority", December 2006.
- H4. The Company shall not commence construction of the Facility (including any site preparation, site clearing, or site grading) unless:
 - (1) the stormwater management and erosion and sediment control plan mentioned in Condition H2 has been approved in writing by the Director; and

- (2) the pre-construction measures outlined in the approved stormwater management and erosion and sediment control plan have been properly installed.

H5. The Company shall implement the approved stormwater management and erosion and sediment control plan during the construction, installation, use, operation and maintenance of the Facility.

I – SURFACE WATER

- I1. The Company shall implement any proposed mitigation measures, contingency measures, and monitoring described in the report included in the Application and entitled "Romney Wind Energy Centre Water Body Report", dated September 2017, and prepared by Natural Resource Solutions Inc.
- I2. A Qualified Inspector retained by the Company shall conduct the site inspections and monitoring described in the following reports:
 - (1) the stormwater management and erosion and sediment control plan approved per Condition H4(1);
 - (2) the report included in the Application and entitled "Romney Wind Energy Centre Water Body Report", dated September 2017, and prepared by Natural Resource Solutions Inc.
- I3. The Company shall create records of all inspections and monitoring carried out pursuant to Condition K2, and shall ensure that the records include the name of the Qualified Inspector who conducted the inspections, date and timing of inspections, and any contingency actions taken. The Company shall retain these records for the life of the Facility, and shall make them available for inspection by the Ministry, upon request.

J – ACCIDENTAL SPILLS

- J1. The Company shall retain a qualified expert to prepare a spill prevention and response plan for the construction, installation, use, operation, maintenance and retiring of the Facility, and submit the plan to the Director prior to the commencement of construction of the Facility.
- J2. The Company shall not commence construction of the Facility (including any site preparation, site clearing, or site grading) until the spill prevention and response plan mentioned in Condition J1 has been approved in writing by the Director.

K – SEWAGE WORKS OF THE TRANSFORMER SUBSTATION SPILL CONTAINMENT FACILITY

- K1. The Company shall design and construct a transformer substation oil spill containment facility which meets the following requirements:

- (1) the spill containment facility serving the transformer substation shall have a minimum volume equal to the volume of transformer oil and lubricants plus the volume equivalent to providing a minimum 24-hour duration, 50-year return storm capacity for the stormwater drainage area around the transformer under normal operating conditions. This containment area shall have:
 - (a) an impervious floor with walls usually of reinforced concrete or impervious plastic liners, sloped toward an outlet / oil control device, allowing for a freeboard of 0.25 metres terminating approximately 0.30 metres above grade to prevent external stormwater flows from entering the facility. The facility shall have a minimum of 300mm layer of crushed stone (19mm to 38mm in diameter) within, all as needed in accordance to site specific conditions and final design parameters; or
 - (b) a permeable floor with impervious plastic walls and around the transformer pad; equipped with subsurface drainage with a minimum 50mm diameter drain installed on a sand layer sloped toward an outlet for sample collection purposes; designed with an oil absorbent material on floor and walls, and allowing for a freeboard of 0.25 metres terminating approximately 0.30 metres above grade to prevent external stormwater flows from entering the facility. The facility's berm shall be designed as needed in accordance to site specific conditions and the facility shall have a minimum 300mm layer of crushed stone (19mm to 38mm in diameter) on top of the system, as needed in accordance to site specific conditions and final design parameters.
- (2) the spill containment facility shall be equipped with an oil detection system; it also shall have a minimum of two (2) PVC pipes (or equivalent material) 50mm diameter to allow for visual inspection of water accumulation. One pipe has to be installed half way from the transformer pad to the vehicle access route;
- (3) the spill containment facility shall have appropriate sewage appurtenances as necessary, such as but not limited to: sump, oil/grit separator, pumpout manhole, level controllers, floating oil sensors, etc., that allows for batch discharges or direct discharges and for proper implementation of the monitoring program described under Condition K4; and
- (4) the Company shall have a qualified person on-site during construction to ensure that the system is installed in accordance with the approved design and specifications.

K2. The Company shall:

- (1) within six (6) months after the completion of the construction of the transformer substation spill containment facility, provide to the District Manager an engineering report and as-built design drawings of the sewage works for the spill containment facility and any stormwater management works required for it, signed and stamped by an independent Professional Engineer licensed in Ontario and competent in electrical and environmental engineering. The engineering report shall include the following:

- (a) as-built drawings of the sewage works for the spill containment facility and any stormwater management works required for it;
 - (b) a written report signed by a qualified person confirming the following:
 - (i) on-site supervision during construction;
 - (ii) in case of a permeable floor systems: type of oil absorbent material used (for mineral-based transformer oil or vegetable-based transformer oil, make and material's specifications);
 - (iii) use of stormwater best management practices applied to prevent external surface water runoff from entering the spill containment facility; and
 - (iv) confirm adequacy of the installation in accordance with specifications.
 - (c) confirmation of the adequacy of the operating procedures and the emergency procedures manuals as it pertains to the installed sewage works;
 - (d) procedures to provide emergency response to the site in the form of pumping and clean-up equipment within 24 hours after an emergency has been identified. Such response shall be provided even under adverse weather conditions to prevent further danger of material loss to the environment.
- (2) as a minimum, the Company shall check the oil detection systems on a monthly basis and create a written record of the inspections;
 - (3) ensure that the effluent is essentially free of floating and settle-able solids and does not contain oil or any other substance in amounts sufficient to create a visible film, sheen or foam on the receiving waters;
 - (4) immediately identify and clean-up all losses of oil from the transformer;
 - (5) upon identification of oil in the spill containment facility, take immediate action to prevent the further occurrence of such loss;
 - (6) ensure that equipment and material for the containment, clean-up and disposal of oil and materials contaminated with oil are kept within easy access and in good repair for immediate use in the event of:
 - (a) loss of oil from the transformer;
 - (b) a spill within the meaning of Part X of the Act; or
 - (c) the identification of an abnormal amount of oil in the effluent.

- (7) in the event of finding water accumulation in the PVC pipes at the time of inspection, as per Condition K4, the Company shall: (a) for impervious floors, inspect the sewage appurtenances that allow drainage of the concrete pit; or (b) for permeable systems, replace the oil absorbent material to ensure integrity of the system performance and design objectives;
- (8) for permeable floor systems, the Company shall only use the type of oil specified in the design, i.e. mineral-based transformer oil or vegetable-based transformer oil. If a change is planned to modify the type of oil, the Company shall also change the type of the oil absorbent material and obtain approval from the Director to amend this Approval before any modification is implemented.

K3. The Company shall design, construct and operate the sewage works such that the concentration of the effluent parameter named in the table below does not exceed the Maximum Concentration Objective shown for that parameter in the effluent, and shall comply with the following requirements:

Effluent Parameters	Maximum Concentration Objective
Oil and Grease	15mg/L

- (1) notify the District Manager as soon as reasonably possible of any exceedance of the maximum concentration objective set out in the table above;
- (2) take immediate action to identify the cause of the exceedance; and
- (3) take immediate action to prevent further exceedances.

K4. Upon commencement of the operation of the Facility, the Company shall establish and carry out the following monitoring program for the sewage works:

- (1) the Company shall collect and analyze the required set of samples at the sampling points listed in the table below in accordance with the measurement frequency and sample type specified for the effluent parameter, oil and grease, and create a written record of the monitoring:

Effluent Parameters	Measurement Frequency and Sample Points	Sample Type
Oil and Grease	Quarterly, i.e. four times over a year, relatively evenly spaced having a minimum two (2) of these samples taken within 48 hours after a 10mm rainfall event.	Grab

- (2) in the event of an exceedance of the maximum concentration objective set out in the table in Condition K3, the Company shall:
 - (a) increase the frequency of sampling to once per month, for each month that effluent discharge occurs; and

(b) provide the District Manager, on a monthly basis, with copies of the written record created for the monitoring until the District Manager provides written direction that monthly sampling and reporting is no longer required;

(3) if over a period of twenty-four (24) months of effluent monitoring under Condition K4, there are no exceedances of the maximum concentration set out in the table for Concentration Objective, the Company may reduce the measurement frequency of effluent monitoring to a frequency as the District Manager may specify in writing, provided that the new specified frequency is never less than annual.

K5. The Company shall comply with the following methods and protocols for any sampling, analysis and recording undertaken in accordance with Condition K4:

(1) Ministry of the Environment and Climate Change publication "Protocol for the Sampling and Analysis of Industrial/ Municipal Wastewater", January 1999, as amended from time to time by more recently published editions; and

(2) the publication "Standard Methods for the Examination of Water and Wastewater", 21st edition, 2005, as amended from time to time by more recently published editions.

L – ARCHAEOLOGICAL RESOURCES

L1. The Company shall implement all of the recommendations, if any, for further archaeological fieldwork and for the protection of archaeological sites found in the consultant archaeologist's reports included in the Application, and which the Company submitted to the Ministry of Tourism, Culture and Sport in order to comply with O. Reg. 359/09.

L2. Should any previously undocumented archaeological resources be discovered, the Company shall:

(1) cease all alteration of the area in which the resources were discovered immediately;

(2) engage a consultant archaeologist to carry out the archaeological fieldwork necessary to further assess the area and to either protect and avoid or excavate any sites in the area in accordance with the *Ontario Heritage Act*, the regulations under that act and the Ministry of Tourism, Culture and Sport's *Standards and Guidelines for Consultant Archaeologists*; and

(3) notify the Director as soon as reasonably possible.

M – CULTURAL HERITAGE RESOURCES AND PROTECTED PROPERTIES

M1. The Company shall implement all of the recommendations for the protection of cultural heritage resources and protected properties found in the heritage consultant's report included in the Application, and which the Company submitted to the Ministry of Tourism, Culture and Sport in order to comply with O. Reg. 359/09.

N - NATURAL HERITAGE AND PRE AND POST CONSTRUCTION MONITORING

GENERAL

- N1. The Company shall implement the Environmental Effects Monitoring Plan for the Romney Wind Energy Centre, titled "Romney Wind Energy Centre, Bird and Bat Environmental Effects Monitoring Plan" dated July 2017, and the commitments made in the following reports included in the Application, and which the Company submitted to the Ministry of Natural Resources and Forestry in order to comply with O. Reg. 359/09:
- Romney Wind Energy Centre, Natural Heritage Records Review Report, dated June 2017, and prepared by Natural Resource Solutions Inc.
 - Romney Wind Energy Centre, Natural Heritage Site Investigation Report, dated June 2017, and prepared by Natural Resource Solutions Inc.
 - Romney Wind Energy Centre, Natural Heritage Evaluation of Significance Report, dated June 2017, and prepared by Natural Resource Solutions Inc.
 - Romney Wind Energy Centre, Natural Heritage Environmental Impact Study Report, dated June 2017, and prepared by Natural Resource Solutions Inc.
- N2. If the Company determines that it must deviate from the Environmental Effects Monitoring Plan or the Environmental Impact Study, described in Condition N1, the Company shall contact the Director, the District Manager and the Ministry of Natural Resources and Forestry, prior to making any changes to the Environmental Effects Monitoring Plan or the Environmental Impact Study, and follow any directions provided.

PRE-CONSTRUCTION MONITORING - SIGNIFICANT HABITAT

- N3. The Company shall implement the pre-construction monitoring described in the Natural Heritage Environmental Impact Study Report described in Condition N1, for the following candidate significant habitats:
- (1) Bald Eagle Habitat (BAL-002);
 - (2) Eastern Wood Pewee Habitat (EWP-001, 003, 004, 005);
 - (3) Cattail Sedge Habitat (CSE-001, 003, 007);
 - (4) Pumpkin Ash Habitat (PAS-001, 003, 007);
 - (5) Halberd-leaved Smartweed Habitat (HLS-001, 003);
 - (6) Shumard Oak Habitat (SHO-001, 003);

POST-CONSTRUCTION MONITORING - SIGNIFICANT HABITAT

- N4. The Company shall implement the post-construction monitoring described in the Natural Heritage Environmental Impact Study Report and the Environmental Effects Monitoring Plan described in Condition N1, for the following confirmed significant habitat:
- (1) Bald Eagle Habitat (BAL-001);
- N5. Based on the results of the pre-construction monitoring described in Condition N3, should any of the habitats described in Condition N3 be deemed significant, the Company shall implement the post-construction monitoring described in the Environmental Effects Monitoring Plan and the Natural Heritage Environmental Impact Study Report described in Condition N1, at the specific habitats that are found to be significant, including the following:
- (1) Bald Eagle Habitat (BAL-002);
 - (2) Eastern Wood Pewee Habitat (EWP-001, 003, 004, 005);
 - (3) Cattail Sedge Habitat (CSE-001, 003, 007);
 - (4) Pumpkin Ash Habitat (PAS-001, 003, 007);
 - (5) Halberd-leaved Smartweed Habitat (HLS-001, 003);
 - (6) Shumard Oak Habitat (SHO-001, 003);

POST CONSTRUCTION MONITORING - BIRD AND BAT MONITORING

- N6. The Company shall implement the post-construction bird and bat mortality monitoring described in the Environmental Effects Monitoring Plan, described in Condition N1, at a minimum of ten (10) turbines, including Turbines 1, 2, 6, 8, 9, 10, 11, 13, 16, and 17.

THRESHOLDS AND MITIGATION

- N7. The Company shall contact the Director, the District Manager, and the Ministry of Natural Resources and Forestry if any of the following bird and bat mortality thresholds, as stated in the Environmental Effects Monitoring Plan described in Condition N1, exceeds:
- (1) 10 bats per turbine per year;
 - (2) 14 birds per turbine per year at individual turbines or turbine groups;
 - (3) 0.2 raptors per turbine per year (all raptors) across the Facility;

- (4) 0.1 raptors per turbine per year (provincially tracked raptors) across the Facility;
- (5) 10 or more birds at any one turbine during a single monitoring survey; or
- (6) 33 or more birds (including raptors) at multiple turbines during a single monitoring survey.

N8. If the bat mortality threshold described in Condition N7(1) is exceeded, the Company shall:

- (1) implement operational mitigation measures consistent with those described in the Ministry of Natural Resources publication entitled "*Bats and Bat Habitats: Guidelines for Wind Power Projects*" dated July 2011, or in an amended version of the publication. Such measures shall include:
 - (a) adjust cut-in speed to 5.5 m/s and/or feather wind turbine blades when wind speeds are below 5.5 m/s between sunset and sunrise, from July 15 to September 30 at all turbines for the operating life of the Facility;
- (2) implement an additional three (3) years of effectiveness monitoring.

N9. If the bat mortality threshold described in Condition N7(1) is exceeded after operational mitigation is implemented in accordance with Condition N8, the Company shall prepare and implement a contingency plan, in consultation with the Director, the District Manager, and the Ministry of Natural Resources and Forestry, to address mitigation actions which shall include additional mitigation and scoped monitoring requirements.

N10. If any of the bird mortality thresholds described in Conditions N7(2), N7(3), or N7(4) are exceeded for turbines located within 120m of bird significant wildlife habitat, or if disturbance effects are realized at bird significant wildlife habitat within 120m of turbine(s) while monitoring is being implemented in accordance with Conditions N6, the Company shall implement immediate mitigation actions as described in the Natural Heritage Environmental Impact Study Report and Environmental Effects Monitoring Plan described in Condition N1, and an additional three (3) years of effectiveness monitoring.

N11. If any of the bird mortality thresholds described in Conditions N7(2), N7(3), or N7(4) are exceeded for turbines located outside 120m of bird significant wildlife habitat, the Company shall conduct two (2) years of subsequent scoped mortality monitoring and cause and effects monitoring. Following the completion of scoped monitoring, the Company shall implement operational mitigation and effectiveness monitoring at individual turbines as agreed to between the Company, the Director, the District Manager, and the Ministry of Natural Resources and Forestry, for the first three (3) years following the implementation of mitigation.

N12. If either of the bird mortality thresholds described in Conditions N7(5) or N7(6) are exceeded, the Company shall prepare and implement a contingency plan to address immediate mitigation actions which shall include:

- (1) periodic shut-down of select turbines; or
- (2) blade feathering at specific times of year; or
- (3) an alternate plan agreed to between the Company, the Director, the District Manager, and the Ministry of Natural Resources and Forestry.

N13. If any of the bird mortality thresholds described in Conditions N7(2), N7(3), or N7(4) are exceeded while monitoring is being implemented in accordance with Conditions N10 or N11, or if either of the bird mortality thresholds described in Conditions N7(5) or N7(6) are exceeded after mitigation is implemented in accordance with Condition N12, the Company shall contact the Director, the District Manager, and the Ministry of Natural Resources and Forestry and prepare and implement an appropriate response plan that shall include some or all of the following mitigation measures:

- (1) increased reporting frequency to identify potential threshold exceedance;
- (2) additional behavioural studies to determine factors affecting mortality rates;
- (3) periodic shut-down of select turbines;
- (4) blade feathering at specific times of year; or
- (5) an alternate plan agreed to between the Company, the Director, the District Manager, and the Ministry of Natural Resources and Forestry.

REPORTING AND REVIEW OF RESULTS

N14. The Company shall report, in writing, the results of the post-construction disturbance monitoring described in Conditions N4, N5, and N6, to the Director, the District Manager, and the Ministry of Natural Resources and Forestry for three (3) years on an annual basis and within three (3) months of the end of each calendar year in which the monitoring took place.

N15. The Company shall report, in writing, bird and bat mortality levels to the Director, the District Manager, and the Ministry of Natural Resources and Forestry for three (3) years on an annual basis and within three (3) months of the conclusion of the November mortality monitoring, with the exception of the following:

- (1) if either of the bird mortality thresholds described in Conditions N7(5) or N7(6) are exceeded, the Company shall report the mortality event to the Director, the District Manager, and the Ministry of Natural Resources and Forestry within 48 hours of observation;
- (2) for any and all mortality of species at risk (including a species listed on the Species at Risk in Ontario list as Extirpated, Endangered or Threatened under the provincial *Endangered Species Act*, 2007) that occurs, the Company shall report the mortality to the Ministry of Natural Resources and Forestry within 24 hours of observation or the next business day;

- (3) if the bat mortality threshold described in Condition N7(1) is exceeded, the Company shall report mortality levels to the Director, the District Manager, and the Ministry of Natural Resources and Forestry for the additional three (3) years of monitoring described in Condition N8, on an annual basis and within three (3) months of the conclusion of the October mortality monitoring for each year;
- (4) if any of the bird mortality thresholds described in Conditions N7(2), N7(3), or N7(4) are exceeded for turbines located within 120m of bird significant wildlife habitat, the Company shall report mortality levels to the Director, the District Manager, and the Ministry of Natural Resources and Forestry for the additional three (3) years of effectiveness monitoring described in Condition N10, on an annual basis and within three (3) months of the conclusion of the November mortality monitoring for each year;
- (5) if any of the bird mortality thresholds described in Conditions N7(2), N7(3), or N7(4) are exceeded for turbines located outside 120 m of bird significant wildlife habitat, the Company shall report mortality levels to the Director, the District Manager, and the Ministry of Natural Resources and Forestry for the additional two (2) years of cause and effects monitoring described in Condition N11, on an annual basis and within three (3) months of the conclusion of the November mortality monitoring for each year; and
- (6) if the Company implements operational mitigation following cause and effects monitoring in accordance with Condition N11, the Company shall report mortality levels to the Director, the District Manager, and the Ministry of Natural Resources and Forestry for the three (3) years of subsequent effectiveness monitoring described in Condition N11, on an annual basis and within three (3) months of the conclusion of the November mortality monitoring for each year.

N16. The Company shall publish the following documents on the Company's website;

- (1) any modifications to the Environmental Effects Monitoring Plan as described in Condition N2 within five (5) days of submitting the final plan to the Director, the District Manager, and the Ministry of Natural Resources and Forestry;
- (2) the results of the post-construction disturbance monitoring as described in Condition N14 within five (5) days of submitting the final report(s) to the Director, the District Manager, and the Ministry of Natural Resources and Forestry; and
- (3) annual bird and bat mortality monitoring as described in Condition N15 with the exception of subsection N15(2), within five (5) days of submitting the final report(s) to the Director, the District Manager, and the Ministry of Natural Resources and Forestry.

O – ENDANGERED SPECIES ACT REQUIREMENTS

- O1. The Company shall ensure that activities requiring authorization under the *Endangered Species Act, 2007* will not commence until necessary authorizations are in place.

P – PETROLEUM RESOURCES

- P1. The Company shall implement all recommendations made in the report included in the Application and entitled "Romney Wind Energy Centre Wind Turbine/Petroleum Resources Interaction", dated February 13, 2018, and signed by Jim McIntosh, P.Eng., Jim McIntosh Petroleum Engineering Ltd.

Q – AVIATION

- Q1. Prior to erecting any wind turbines, the Company shall retain, at its own expense, an independent aeronautical consultant, and ensure that the independent aeronautical consultant offers to the aerodrome owners identified in the report entitled "Romney Wind Project - Local Aerodrome Evaluation", dated February 22, 2018, and signed by Charles Cormier, Aeronautical Information Consultant, assistance in establishing optimum safe circuit configurations and any other relevant safe operating procedures for their respective aerodromes, and assistance in publishing any necessary information in the Canada Flight Supplement and other relevant publications, as described in the aforementioned report. Should the aerodrome owners consent to being offered this assistance, the Company shall ensure that the independent aeronautical consultant retained at the Company's expense provide this assistance to the aerodrome owners prior to erecting any wind turbines, and that this assistance continue to be available to the aerodrome owners, as required, for the life of the Facility.
- Q2. The Company shall notify NAV Canada at least ten (10) business days prior to the erection of any wind turbines and shall provide a copy of the notification to the Director and the District Manager on the same day it is provided to NAV Canada.

R – FOUNDATION DESIGN

- R2. The foundations for Facility components shall be constructed in accordance with the Application and shall not include the use of piles.
- R2. If the Company determines that the foundation for Facility components require the use of piles, prior to the commencement of construction of the Facility components in question, the Company shall apply to the Director for an amendment to the terms and conditions of this Approval.

S – MUNICIPAL CONSULTATION

- S1. At least three (3) months prior to the commencement of construction of the Facility, the Company shall prepare a traffic management plan and provide it to the Municipality of Chatham-Kent, Town of Lakeshore, and Essex County.
- S2. The Company shall make reasonable efforts to enter into a road users agreement with the Municipality of Chatham-Kent, Town of Lakeshore, and Essex County prior to the commencement of construction of the Facility.

- S3. If a road users agreement has not been signed with the Municipality of Chatham-Kent, Town of Lakeshore, and Essex County prior to the commencement of construction of the Facility, the Company shall promptly provide a written explanation to the Director as to why this has not occurred.
- S4. The Company shall not erect Turbine 5 and Turbine 6 unless:
- (1) the Company receives written correspondence from the Municipality of Chatham-Kent confirming that the Municipality of Chatham-Kent does not have outstanding concerns regarding the potential for Turbine 5 and Turbine 6 to impact two-way communications from the Baton radio tower site; or
 - (2) the Company receives written correspondence from the Municipality of Chatham-Kent confirming that any outstanding concerns from the Municipality of Chatham-Kent regarding the potential for Turbine 5 and Turbine 6 to impact two-way communications from the Baton radio tower site have been addressed in the form of a written agreement between the Company and the Municipality of Chatham-Kent.
- S5. The Company shall notify the Director and the District Manager in writing within five (5) business days of receiving written correspondence from the Municipality of Chatham-Kent pursuant to the requirements of Condition S4(1) and/or Condition S4(2).

T – COMMUNITY LIAISON COMMITTEE

- T1. Within three (3) months of receiving this Approval, the Company shall make reasonable efforts to establish a community liaison committee. The community liaison committee shall be a forum to exchange ideas and share concerns with interested residents and members of the public. The community liaison committee shall be established by:
- (1) publishing a notice in a newspaper with general circulation in each local municipality in which the Project Location is situated; and
 - (2) posting a notice on the Company's publicly accessible website, if the Company has a website;
- to notify members of the public about the proposal for a community liaison committee and invite residents living within a one (1) kilometre radius of the Facility that may have an interest in the Facility to participate on the community liaison committee.
- T2. The Company may invite other members of stakeholders to participate in the community liaison committee, including, but not limited to, local municipalities, local conservation authorities, Indigenous communities, federal or provincial agencies, and local community groups.
- T3. The community liaison committee shall consist of at least one Company representative who shall attend all meetings.
- T4. The purpose of the community liaison committee shall be to:

- (1) act as a liaison facilitating two way communications between the Company and members of the public with respect to issues relating to the construction, installation, use, operation, maintenance and retirement of the Facility;
 - (2) provide a forum for the Company to provide regular updates on, and to discuss issues or concerns relating to, the construction, installation, use, operation, maintenance and retirement of the Facility with members of the public; and
 - (3) ensure that any issues or concerns resulting from the construction, installation, use, operation, maintenance and retirement of the Facility are discussed and communicated to the Company.
- T5. The community liaison committee shall be deemed to be established on the day the Director is provided with written notice from the Company that community liaison committee members have been chosen and a date for a first community liaison committee meeting has been set.
- T6. If a community liaison committee has not been established within three (3) months of receiving this Approval, the Company shall promptly provide a written explanation to the Director as to why this has not occurred.
- T7. The Company shall ensure that the community liaison committee operates for a minimum period of two (2) years from the day it is established. During this two (2) year period, the Company shall ensure that the community liaison committee meets a minimum of two (2) times per year. At the end of this two (2) year period, the Company shall contact the Director to discuss the continued operation of the community liaison committee.
- T8. The Company shall ensure that all community liaison committee meetings are open to the general public.
- T9. The Company shall provide administrative support for the community liaison committee including, at a minimum:
- (1) providing a meeting space for community liaison committee meetings;
 - (2) providing access to resources, such as a photocopier, stationery, and office supplies, so that the community liaison committee can:
 - (a) prepare and distribute meeting notices;
 - (b) record and distribute minutes of each meeting; and
 - (c) prepare reports about the community liaison committee's activities.
- T10. The Company shall submit any reports of the community liaison committee to the Director and post it on the Company's publicly accessible website, if the Company has a website.

U – INDIGENOUS CONSULTATION

- U1. During the construction, installation, operation, use and retiring of the Facility, the Company shall:
- (1) create and maintain written records of any communications with Indigenous communities; and
 - (2) make the written records available for review by the Ministry upon request.
- U2. The Company shall provide the following to interested Indigenous communities:
- (1) updated project information, including the results of monitoring activities undertaken and copies of additional archaeological assessment reports that may be prepared; and
 - (2) updates on key steps in the construction, installation, operation, use and retirement phases of the Facility, including notice of the commencement of construction activities at the Project Location.
- U3. If an Indigenous community requests a meeting to obtain information relating to the construction, installation, operation, use and retiring of the Facility, the Company shall make reasonable efforts to arrange and participate in such a meeting.
- U4. The Company shall invite members of Indigenous communities to participate in further archaeological fieldwork.
- U5. If any archaeological resources of Indigenous origin are found during the construction of the Facility, the Company shall:
- (1) notify any Indigenous community considered likely to be interested or which has expressed an interest in such finds; and
 - (2) if a meeting is requested by an Indigenous community to discuss the archaeological find(s), make reasonable efforts to arrange and participate in such a meeting.

V – OPERATION AND MAINTENANCE

- V1. Prior to the commencement of the operation of the Facility, the Company shall prepare a written manual for use by Company staff outlining the operating procedures and a maintenance program for the Equipment that includes as a minimum the following:
- (1) routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the Equipment suppliers;
 - (2) emergency procedures;
 - (3) procedures for any record keeping activities relating to operation and maintenance of the Equipment; and

- (4) all appropriate measures to minimize noise emissions from the Equipment.

V2. The Company shall;

- (1) update, as required, the manual described in Condition V1; and
- (2) make the manual described in Condition V1 available for review by the Ministry upon request.

V3. The Company shall ensure that the Facility is operated and maintained in accordance with the Approval and the manual described in Condition V1.

W – RECORD CREATION AND RETENTION

W1. The Company shall create written records consisting of the following:

- (1) an operations log summarizing the operation and maintenance activities of the Facility;
- (2) within the operations log, a summary of routine and Ministry inspections of the Facility; and
- (3) a record of any complaint alleging an Adverse Effect caused by the construction, installation, use, operation, maintenance or retirement of the Facility.

W2. A record described under Condition W1(3) shall include:

- (1) a description of the complaint that includes as a minimum the following:
 - (a) the date and time the complaint was made;
 - (b) the name, address and contact information of the person who submitted the complaint;
- (2) a description of each incident to which the complaint relates that includes as a minimum the following:
 - (a) the date and time of each incident;
 - (b) the duration of each incident;
 - (c) the wind speed and wind direction at the time of each incident;
 - (d) the ID of the Equipment involved in each incident and its output at the time of each incident;
 - (e) the location of the person who submitted the complaint at the time of each incident; and

- (3) a description of the measures taken to address the cause of each incident to which the complaint relates and to prevent a similar occurrence in the future.

W3. The Company shall retain, for the life of the Facility, all records described in Condition W1, and make these records available for review by the Ministry upon request.

X – NOTIFICATION OF COMPLAINTS

- X1. The Company shall notify the District Manager in writing of each complaint within two (2) business days of the receipt of the complaint.
- X2. The Company shall provide the District Manager with the written records created under Condition W1(3) within eight (8) business days of the receipt of the complaint.
- X3. If the Company receives a complaint related to groundwater, the Company shall contact the District Manager within one (1) business day of the receipt of the complaint to discuss appropriate measures to manage any potential groundwater issues.

Y – CHANGE OF OWNERSHIP

- Y1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any of the following changes:
 - (1) the ownership of the Facility;
 - (2) the operator of the Facility;
 - (3) the address of the Company;
 - (4) the partners, where the Company is or at any time becomes a partnership and a copy of the most recent declaration filed under the *Business Names Act*, R.S.O. 1990, c.B.17, as amended, shall be included in the notification; and
 - (5) the name of the corporation where the Company is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the *Corporations Information Act*, R.S.O. 1990, c. C.39, as amended, shall be included in the notification.

SCHEDULE A
Facility Description

1. The Facility shall consist of the construction, installation, operation, use and retiring of the following:
 - (a) a total of seventeen (17) wind turbine generators each rated between approximately 3.45 to 3.6 megawatts generating output capacity, as specified in the Acoustic Assessment Report and/or Acoustically Equivalent Wind Turbine(s). The Acoustically Equivalent Wind Turbine(s) shall:
 - (i) have a maximum total name plate capacity of approximately 60 MW,
 - (ii) be designated with source ID Nos. noted in Schedule B of this Approval,
 - (iii) have a hub height of up to 132 metres above grade and blade length of up to 68 metres, and
 - (iv) be sited at the coordinates shown in Schedule B, in accordance with Condition C1(2)(b).
 - (b) associated ancillary equipment, systems and technologies including one (1) transformer substation, on-site access roads, and underground and overhead cabling and distribution lines,

all in accordance with the Application.
2. The location of any temporary laydown areas, access roads, entrances to the site, underground or overhead distribution or transmission lines, and other project components associated with the Facility, excluding the Equipment, may be altered or moved by up to 20 metres from the locations specified in the Application, provided that:
 - (a) proposed modifications to the project are all within the already-assessed Project Location;
 - (b) all setback prohibitions established under O. Reg. 359/09 are complied with;
 - (c) the appropriate ministries have been consulted, including the Ministry of Natural Resources and Forestry and the Ministry of Tourism, Culture and Sport, as applicable;
 - (d) any applicable revised report in respect of the proposed modifications, as well as a modifications document prepared in accordance with Chapter 10 of the Ministry of the Environment and Climate Change publication "Technical Guide to Renewable Energy Approvals", 2017, as amended, is prepared and submitted to the Director; and
 - (e) no modifications to the project occurs until the Director provides written approval of the proposed modifications in the form of a letter.
3. The Company shall follow any and all directions provided to the Director in respect of project modifications proposed pursuant to Item 2 of Schedule A.

SCHEDULE B
Coordinates of the Equipment and Noise Specifications
Coordinates of the Equipment are listed below in UTM, Z17-NAD83 projection:

Source ID	Maximum Sound Power Level (dBA)	Easting	Northing	Hub Height [m]	Turbine Model or Acoustically Equivalent Wind Turbine	Vestas' Operational Mode
		[m]	[m]			
1	106.0	380,450	4,670,257	132	Vestas V136 3.6 MW	P01
2	106.0	380,172	4,667,904	132	Vestas V136 3.6 MW	P01
3	104.0	380,880	4,668,771	132	Vestas V136 3.45 MW	S02
4	104.9	381,401	4,668,982	132	Vestas V136 3.45 MW	S01
5	106.0	380,034	4,666,186	132	Vestas V136 3.6 MW	P01
6	106.0	381,193	4,666,947	132	Vestas V136 3.6 MW	P01
7	104.9	382,074	4,667,940	132	Vestas V136 3.45 MW	S01
8	104.9	382,601	4,668,405	132	Vestas V136 3.45 MW	S01
9	106.0	379,836	4,664,164	132	Vestas V136 3.6 MW	P01
10	104.0	380,294	4,664,560	132	Vestas V136 3.45 MW	S02
11	104.0	382,928	4,666,887	132	Vestas V136 3.45 MW	S02
12	106.0	381,306	4,663,384	132	Vestas V136 3.6 MW	P01
13	106.0	381,882	4,664,077	132	Vestas V136 3.6 MW	P01
14	106.0	382,914	4,665,008	132	Vestas V136 3.6 MW	P01
15	104.9	383,866	4,665,878	132	Vestas V136 3.45 MW	S01
16	106.0	385,721	4,666,054	132	Vestas V136 3.6 MW	P01
17	106.0	376,473	4,669,991	132	Vestas V136 3.6 MW	P01
A1	106.0	379,958	4,671,291	132	Vestas V136 3.6 MW	P01
Transformer Substation	103.5	378,771	4,678,188	N/A	N/A	N/A

Note: The Maximum Sound Power Level of the Transformer includes the applicable 5 dB tonal penalty described in the Noise Guidelines for Wind Farms.

SCHEDULE C

Noise Control Measures

Acoustic Barrier

One (1) three (3) sided acoustic barrier with a height of 6.0 m on the east side of the transformer substation and with a height of 5.0 m on the north and south sides of the transformer substation, positioned as per Section 4.4 of the Acoustic Assessment Report. The acoustic barrier shall be continuous without holes, gaps and other penetrations, and having surface mass at least 20 kilograms per square metres.

Minor adjustments to barrier positioning are acceptable, in order to accommodate the final transformer geometric size, as long as modelled sound levels are equal or below sound levels in the Acoustic Assessment Report. If there are minor adjustments to the barrier alignment an updated Acoustic Assessment Report based on the actual barrier configuration shall be submitted to the Director and the District Manager three (3) months (or a date agreed to in writing by the Director) prior to construction of the acoustic barrier.

The reasons for the imposition of these terms and conditions are as follows:

1. Conditions A1, A2, A9, A10, and R are included to ensure that the Facility is constructed, installed, used, operated, maintained and retired in the manner in which it was described for review and upon which Approval was granted. These conditions are also included to emphasize the precedence of conditions in the Approval and the practice that the Approval is based on the most current document, if several conflicting documents are submitted for review.
2. Conditions A3 and A4 are included to require the Company to provide information to the public and the local municipality.
3. Conditions A5, A6, and A8 are included to ensure that final retirement of the Facility is completed in an aesthetically pleasing manner, in accordance with Ministry standards, and to ensure long-term protection of the health and safety of the public and the environment.
4. Condition A7 is included to require the Company to inform the Ministry of the commencement of activities related to the construction, installation and operation of the Facility.
5. Condition B is intended to limit the time period of the Approval.
6. Condition C1 is included to provide the minimum performance requirement considered necessary to prevent an Adverse Effect resulting from the operation of the Equipment and to ensure that the noise emissions from the Equipment will be in compliance with applicable limits set in the Noise Guidelines for Wind Farms.

7. Conditions C2, C3, and D are included to ensure that the Equipment is constructed, installed, used, operated, maintained and retired in a way that meets the regulatory setback prohibitions set out in O. Reg. 359/09.
8. Conditions E and F are included to require the Company to gather accurate information so that the environmental noise impact and subsequent compliance with the Act, O. Reg. 359/09, the Noise Guidelines for Wind Farms and this Approval can be verified. Specifically, Condition F is also included to verify whether the results of the acoustic emission measurements for wind turbines comply with the Maximum Sound Power Levels (dBA) shown in Schedule B of the Approval, however with consideration that Part E of the Compliance Protocol for Wind Turbines will be used to evaluate compliance of the Facility.
9. Conditions G, H, I, J, K, N, O, P, Q, and S are included to ensure that the Facility is constructed, installed, used, operated, maintained and retired in a way that does not result in an Adverse Effect or hazard to the natural environment or any persons.
10. Condition L is included to protect archaeological resources that may be found at the Project Location.
11. Condition M is included to protect cultural heritage resources and protected properties.
12. Condition T is included to ensure continued communication between the Company and the local residents.
13. Condition U is included to ensure continued communication between the Company and interested Indigenous communities.
14. Condition V is included to emphasize that the Equipment must be maintained and operated according to a procedure that will result in compliance with the Act, O. Reg. 359/09 and this Approval.
15. Condition W is included to require the Company to keep records and provide information to the Ministry so that compliance with the Act, O. Reg. 359/09 and this Approval can be verified.
16. Condition X is included to ensure that any complaints regarding the construction, installation, use, operation, maintenance or retirement of the Facility are responded to in a timely and efficient manner.
17. Condition Y is included to ensure that the Facility is operated under the corporate name which appears on the application form submitted for this Approval and to ensure that the Director and District Manager is informed of any changes.

NOTICE REGARDING HEARINGS

In accordance with Section 139 of the Environmental Protection Act, within 15 days after the service of this notice, you may by further written notice served upon the Director, the Environmental Review Tribunal and the Environmental Commissioner, require a hearing by the Tribunal.

In accordance with Section 47 of the Environmental Bill of Rights, 1993, the Environmental Commissioner

will place notice of your request for a hearing on the Environmental Registry.

Section 142 of the Environmental Protection Act provides that the notice requiring the hearing shall state:

- a. The portions of the renewable energy approval or each term or condition in the renewable energy approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The signed and dated notice requiring the hearing should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The renewable energy approval number;
4. The date of the renewable energy approval;
5. The name of the Director;
6. The municipality or municipalities within which the project is to be engaged in;

This notice must be served upon:

The Secretary*
Environmental Review Tribunal
655 Bay Street, 15th Floor
Toronto, Ontario
M5G 1E5

AND

The Environmental Commissioner
1075 Bay Street, 6th Floor
Suite 605
Toronto, Ontario
M5S 2B1

AND

The Director
Section 47.5, *Environmental Protection Act*
Ministry of the Environment and Climate
Change
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 326-5370 or www.ert.gov.on.ca**

Under Section 142.1 of the Environmental Protection Act, residents of Ontario may require a hearing by the Environmental Review Tribunal within 15 days after the day on which notice of this decision is published in the Environmental Registry. By accessing the Environmental Registry at www.ebr.gov.on.ca, you can determine when this period ends.

Approval for the above noted renewable energy project is issued to you under Section 47.5 of the Environmental Protection Act subject to the terms and conditions outlined above.

DATED AT TORONTO this 16th day of April, 2018



Mohsen Keyvani, P.Eng.
Director
Section 47.5, *Environmental Protection Act*

MK/

c: Area Manager, MOECC Windsor
c: District Manager, MOECC Sarnia
Kevin Campbell, Romney Energy Centre Limited Partnership

ATTACHMENT 2

Romney Letter for Main Transformer Pit (Wood, February 2020)



Wood Canada Limited
700-2020 Winston Park Drive
Oakville, ON, L6H 6X7
Canada
T: 905-829-5400
F: 905-829-5401
www.woodplc.com

February 19, 2020

Amanda Stieva
Project Manager
Black & McDonald Limited
31 Pullman Ct, Scarborough
ON, M1X 1E4

Dear Ms. Stieva,

**Re: Romney Energy Centre
Conformance of 230kV Substation's Main Transformer Oil Containment Pit to
Section K of Renewable Energy Approval Number 3397-AV3MVX**

This letter is to advise that the transformer containment pit for the 230 kV sub-station of the above referenced project has been constructed in general conformance to Engineering drawings and the following Renewable Energy Approval requirements:

- 1) The spill containment area serving the substation transformer has a minimum volume equal to the volume of transformer oil and lubricants plus the volume equivalent to providing a minimum 24-hour duration, 50-year return storm capacity for the stormwater drainage area around the transformer under normal operating conditions;
- 2) The containment facility has an impervious concrete floor and walls, sloped towards an oil/water detection pump, maintaining a freeboard of approximately 0.25 meters, terminating approximately 0.30 meters above grade and a minimum 300mm layer of crushed stone (19mm to 38mm in diameter) within, all as needed in accordance to site specific conditions and final design parameters;
- 3) The spill containment facility is equipped with a sump pump inside a manhole including an oil detection system. The manhole, sump pump and discharge pipe located within the substation facility has been constructed in general conformance with the Engineering drawings and specifications;
- 4) Stormwater management works for the Oil Containment facility is constructed in general conformance of the approved Storm Water Management Report and Drainage drawings;
- 5) BMD's quality control personnel were on-site during construction to ensure that the spill containment facility was installed in accordance with the approved design drawings and specifications;
- 6) Operator of the facility to ensure conformance to items (c) and (d) of section K2 (1) of REA No. 3397-AV3MVX.



The Containment pit Construction was completed on December 2019. As part of this submission, the following document is attached:

Document Description	Document No.	Revision
Civil Substation Grading Plan	201453-2000-DD10-GRD-0201-001	2
230kv/34.5kv Substation-Transformer & Containment pit Foundation Plan, Section and Details	201453-2000-DD20-DTL-0113-001	2

Sincerely,

Nayereh Farzanehazad, P. Eng.
Lead Civil Engineer
Wood Canada Limited
T: 905-815-2978
Nayereh.azad@woodplc.com



Hamid Rezaei, P. Eng.
Lead Electrical Engineer
Wood Canada Limited
T: 905-403-3529
Hamid.rezaei@woodplc.com





ATTACHMENT 3

Spill Prevention Control and Countermeasure (SPCC) Procedure
(EDF Renewable Services, February 2020)

 ☐ EDF RE (US) ☐ EDF RS (US) ☒ EDF RS (CAN) ☐ EDF EN (CAN) ☐ EDF EN (MX) ☐ EDF EN (CH)	Procedure				Document#: HSE – 01 – 2 356	
	Spill Prevention Control & Countermeasure – Ontario					
	Applies to Audience / Specific Area: All Ontario O&M employees				Issuing Department: HSE	
	Written by: Anne-Valerie Dubois	Date: 6/1/201	Revised By: Veronique Godard	Rev. Date: 2/8/201	Rev. #: 1	Status: Approved By: Amber Bell

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1 Introduction

The primary goal of preparing and implementing a spill prevention plan is to prevent spills from occurring and respond appropriately when they occur.

The Ontario Regulation 224/07-Spill Prevention and Contingency Plans under the Environmental Protection Act require the preparation of site-specific spill prevention and contingency plan for each plant indicated in Section 3(1) of Ontario Regulations 222/07 (Environmental Penalties) made under the Act that the person owns or operates.

The spill prevention plan defines prevention, preparedness, response and recovery measures for identified incident scenarios with offsite impacts (i.e. outside or the property limits) as well as the critical site specific notification procedures for onsite and offsite.

2 Purpose

The purpose of this document is to ensure that the facility is compliant with the Ontario environmental requirements for preparing and maintaining a spill prevention plan. It is also to limit the risk of release of a pollutant into the environment and to ensure that potential spills or emergencies stemming from the installed equipment are responded safely and promptly to limit the spread of pollutants beyond their point of release (e.g. moving to other properties).

3 Scope

This plan applies to site operations in the facilities listed at the above address and where the employees may be exposed to potential oil discharge situations under normal working conditions or during an emergency. It is not intended to be an overall emergency plan for the entire facility. It has been developed to address potential emergencies related to pollutant spills (mainly related to oil spills for solar and wind sites. The Manager of each facility must implement and test this plan and make sure that the plan is available to the employees.

4 Definitions

Above-ground tank: a tank that operates at atmospheric pressure and that has all of its volume either above grade or encased within an unfilled secondary containment.

Alarm signal: an audible signal transmitted throughout a zone or zones or throughout a building to advise occupants that a fire emergency exists.

Alert signal: an audible signal to advise designated persons of a fire emergency

Biodegradable: substances capable of being broken down (decomposed) rapidly by the action of microorganisms (include food such as vegetable-oil).

Class A fire: a fire involving combustible materials such as wood, cloth and paper.

Class B fire: a fire involving a flammable or combustible liquid, fat or grease.

Class C fire: a fire involving energized electrical equipment.

Closed container: a container so sealed by means of a lid or other device that neither liquid nor vapor will escape from it at ordinary temperatures.

Combustible liquid: Class II or Class IIA liquids having a flash point at or above 37.8oC and below 93.3oC.

Facility: a property, including open air industrial processing, occurs, whether or not a building is located on the property.

Flammable liquid: Class I liquid having a flash point below 37.8oC and having a vapor pressure not more than 275.8 kPa (absolute) at 37.8°C as determined by ASTM D 323, "Vapor Pressure of Petroleum Products (Reid Method)". When a liquid

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having a flash point at or above 37.8oC is being processed, stored, handled or used at temperature at or above its flash point it must be treated as a Class I liquid.

Flash point: the lowest temperature at which a liquid within a container gives off vapor in sufficient concentration to form an ignitable mixture with air near the surface of the liquid.

Inspection: physical examination to determine that the device or system will apparently perform in accordance with its intended function.

Large spill: a spill of 100L or more that cannot be contained safely with the materials on the site, threatens safety to life, and/or threatens to enter the sewer system or travel beyond boundaries of building/property to endanger the environment. The Emergency Services shall be contacted.

Lower explosive limit (LEL): the minimum concentration of vapor in air at which the propagation of flame occurs on contact with a source of ignition.

Means of egress: a continuous path of travel provided for the escape of persons from any point in a building or contained open space to an exterior open space protected from fire exposure from the building and having access to an open public thoroughfare. Means of egress includes both exits and access to exits.

Non-Petroleum oil: includes but is not limited to mineral oil, vegetable oil and animal oil

Petroleum product: a product other than an allied petroleum product, a single hydrocarbon or a mixture of at least 70% hydrocarbons by volume, refined from crude oil, with or without additives, that is used or could be used as a fuel, lubricant or power transmitter, and includes used oil, but does not include propane, paint and solvents.

Secondary containment: containment that prevents liquids that leak from a storage tank system from reaching outside the containment area and includes double- walled tanks, piping, liners and impermeable barriers.

Small spill: a spill of less than 100L that usually presents little of no hazard to a person or property, and is small enough to be safely cleaned up using the emergency spill kit.

Spill: any loss of a petroleum product or an allied petroleum product in liquid form from a storage tank system, including a loss during a transfer of such a product to or from a storage tank system, but not including a loss that does not reach outside the storage tank system's secondary containment.

Storage tank: a closed container with a capacity of more than 230 L that is designed to be installed in a fixed location.

Transfer area: the area around the connection point between a delivery truck and a storage tank system.

Used oil: oil other than oils derived from animal or vegetable fats, including lubricating oil, hydraulic fluid and insulating oil.

Vapor pressure: the pressure exerted by a liquid as determined by ASTM D 323, "Vapor Pressure of Petroleum Products (Reid Method).

Viscosity: the resistance that a liquid offers to flow.

5 Roles and Responsibilities

The following sections assign specific roles and responsibilities to key staff for implementing this emergency plan. Please refer to the emergency contact list for names and contact information.

5.1 HSE Manager

- Ensuring the system meets all applicable regulations and codes;
- All operating, maintenance and decommissioning expenses for the system;
- Funding required and training;
- Ensuring that arrangements are made with local contractors to assist in the event of a large spill;
- Reporting to regulatory authorities as required under environmental legislation;

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- Coordinating spill response training, upon request;
- Providing guidance on incident reporting requirements when contacted;
- Reporting to regulatory authorities as required under health and safety legislation.

5.2 Area Manager / Site Manager

- Familiarizing themselves with the emergency plan and location and use of the emergency response equipment;
- Ensuring that the emergency plan is kept in their workspace and that a copy is available at the solar plant or the wind farm (e.g. inside the spill kit);
- Ensuring that all employees are trained before being involved in an emergency procedure;
- Ensuring that an employee supervises all product deliveries and communicates with the Manager and the other appropriate emergency contacts in case of emergency;
- Following the emergency measures outlined in this document, as required;
- Keeping the Emergency Contact List up-to-date;
- Advising the HSE Manager if revisions to the emergency plan are necessary (excluding revisions to the Emergency Contact List);
- Following standard operating procedures and completing required inspections of the system.
- The Site Manager has the ultimate responsibility for ensuring that employees comply with the spill prevention plan.

5.3 Site Safety Specialist

- Familiarizing themselves with the emergency plan and location and use of the emergency response equipment.
- Ensuring that the emergency plan is kept in their workspace and that a copy is available at the solar plant or the wind farm (e.g. inside the spill kit).
- Following the emergency measures outlined in this document, as required.
- Advising the HSE Manager if revisions to the emergency plan are necessary (excluding revisions to the Emergency Contact List).
- Advising their managers when on-site emergency response equipment needs replacement.
- Following standard operating procedures and completing required inspections of the system.

5.4 All Solar Technicians/ Wind Technicians

- Familiarizing themselves with this emergency plan, and the location and use of the emergency response equipment;
- Calling the appropriate contact numbers in case of emergency;
- Keep unnecessary and unprotected personnel out of the spill area;
- Shutdown the system (valves);
- Follow Assessment Procedure;
- Use personal protective equipment (PPE) as required by the situation. This may include gloves, face shield and respiratory protection.

5.5 All Employees

- Must sign the acknowledgement (Appendix 5) to confirm the review of the spill prevention plan.

6 Equipment Description and Content

Description of the operations related to the equipment covered by the spill prevention plan is included in the Appendix 1.

All equipment is designed such that any accidental release should be contained and not directly released into the environment.

An accidental leak would be contained by the external containment system. However the equipment is designed such that any accidental release should be contained and not directly released into the environment.

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In the event of a release (loss of containment), spill response equipment (e.g. universal sorbent) and operational procedures will mitigate the consequences of this event.

The solar and wind sites are operated, maintained and inspected by solar/wind technicians. The solar/wind technicians inspect the plant when in operation and perform the majority of typical required maintenance. Qualified external contractors are called in when the required work falls outside of the scope normally covered by the solar/wind technicians (e.g. HV contractor).

7 Hazard Analysis

Include all your SDS sheet in the appendix 3.

Include the SDS sheet of the oil contained in the transformer.

8 Emergency Measures – Spills

The nature and chemical characteristics of petroleum products make emergencies associated with storage systems a continual priority. Fires and spills are more likely to occur during product delivery or dispensing activities. Potential scenarios include a delivery truck colliding with the system, operator error during transfer and equipment failure. These potential scenarios could result in a spill.

For the purpose of this document, a small spill is a spill of less than 100 L and a large spill is a spill of 100 L or more.

The worst case scenario would be a large spill of oil when it is raining (e.g. transformer failure causing leakage, spill during removal or transfer of oil, etc.).

8.1 Prevention of Spills

The following measures will help prevent the occurrence of fires and spills:

- Ensure the checking, inspection and testing of safety devices;
- Ensure appliances, devices and its components operate or appear to operate as intended;
- Repair/replace any failure/malfunctioning appliance, device or component of a device and keep records of tests and corrective measures;
- Check on site spill kits for completeness (see Section 10) and ensure a spill kit is also available in the company vehicle;
- Ensure an employee supervises all product deliveries;
- Follow standard operating procedures and complete required inspections for the system.
- Ensure prohibition of smoking, open flames or other sources of ignition is prominently posted in the vicinity of the oil tanks (including transformers and other installed equipment);
- Use non-sparking tools in the vicinity of the oil tanks;
- Control access to the transformers.

8.2 Preparation for Spills

The following measures will prepare the site for emergencies related to spills:

- Ensure the Spill prevention plan is displayed within the Substation Spill Kit locations;
- Prominently posted the emergency contact numbers at the Solar Plant or the Wind Farm (e.g. Entrances) and keep it up to date;
- Ensure that the Solar/Wind Technicians keep a copy of the emergency contact numbers (e.g. inside the spill kit in the truck);
- Provide a summary list of all transformers on site, including their capacity and contents;

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- Train Solar/Wind Technicians with the emergency plan and the location and use of the emergency response equipment;
- Ensure all access points are unlocked during product deliveries to facilitate escape from fire.

8.3 Response to Spills

The following measures will be followed to respond to a spill:

- NEVER PLACE YOURSELF OR OTHERS IN DANGER;
- Warn all surrounding staff upon detection of an alarming or offensive odor or a small pool of liquid on the ground;
- Notify Site Manager and act as the Spill Coordinator until Site Manager arrival;
- Determine if there is a potential for danger. Evaluate the toxicity, flammability, and other hazardous properties as well as the size and location of the spill to determine whether evacuation or additional assistance is necessary;
- If there is a potential for danger (e.g. vapors from the leak or spill can collect in a confined space sufficiently to form an explosive mixture), evacuate immediately the area, contact the appropriate emergency contacts and await assistance;
- Eliminate ignition sources (heat, flames and sparks). Turn off any ignition sources such as motors, and other spark-producing equipment;
- Isolate the affected equipment ("indicate the type of equipment") and possibly multiple unit's/ihouses depending on where the affected on is on the feeder line/Stop the flow/ Shutdown the system (DE energized the main breaker/closed the valves), etc.
- Instruct anyone not involved in the spill response to stay back at least 50 m in all directions;
- Stay upwind and away from low areas where vapors can accumulate;
- Spill on impermeable surfaces (concrete or asphalt surface): Leave diapers and snakes around the unit to absorb any existing leak;
- Spill on a permeable soil or surface fill: Dike the spill materials where this is possible to prevent entry into waterways, sewer, basements or confined areas. Avoid discharge to the aquatic environment;
- If possible, stop spill at source and contain the spill using equipment from the spill kit including available Personal Protective Equipment (e.g. Goggles/face shield, chemical resistant gloves and Chemical/oil resistant clothing, Respirator, etc.);
- Do not breathe fumes/gas/mist/vapors. Use respirator in case of vapor. Avoid contact with skin;
- Cover the spill with a plastic sheet;
- Clean up the exterior of the transformer as best as possible.

8.3.1 Small spill (< 100L)

(e.g. spill detected by an alarming or offensive odor or by a small pool of liquid in the ground)

- Complete the clean-up of spilled product using the material in the spill kits (for incident under control only);
- Absorb substance with vermiculite dry sand or earth or absorbent material on impermeable surfaces.
- Remove contaminated soil with a non-sparking shovel and ensure all the liquid has been removed with absorbent material;
- Place contaminated soil into a metal container with a lid (e.g. drum);
- Dispose waste material resulting from a leak of flammable liquid and combustible liquid in accordance with Part X of the Environmental Protection Act;
- Call the Environmental Cleaning Company (see table 11.2Appendix 4) to dispose of the waste material.

8.3.2 Large spill (> 100L)

(e.g. spill detected by the existence of a large pool of liquid on the ground or large vapor cloud and in case of spillage to drain/water body)

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	Written by: Anne-Valerie Dubois	Date: 6/1/201	Revised By: Veronique Godard	Rev. Date: 2/8/201	Rev. #: 1	Status: Approved By: Amber Bell

- Evacuate immediately if you are in danger otherwise secure the area and prevent the release of pollutants in the environment (soil, groundwater, surface water, sewer, etc.);
- Notify the Local Fire and Emergency Services at 911 and contact the Manager (e.g. during the transfer of products);
- Manager notifies immediately the relevant authorities and management (e.g. MOE, any municipality within the boundaries or the spill, regional municipality, the owner or the person having control of the pollutant, etc.) for spill over than 100 L or for spill that enter any waters or can cause any adverse effects, other than those that are readily remediated through cleanup and restoration of paved, graveled or sodded surfaces; and contacts the appropriate emergency response contractors (see **Appendix 4**);
- Dike the spill oil where this is possible in order to prevent entry into waterways, sewer, basements or confined areas;
- Cover spill with a plastic sheet to prevent spreading by the rain;
- Call the Environmental Cleaning Company (see Appendix 4) to clean the exposed area and for disposal of the waste material;
- Call a qualified person (see Appendix 4) to perform an assessment of contaminants;
- Barricade the affected area located near public and post signage to provide public notification;
- Submit an incident report to relevant authorities.

8.4 Recovery from Spills

Depending on the nature and circumstances of the incident, various follow-up measures may be required, as follows:

- Always complete an Incident Report (HSE-01-5 308 Incident Report);
- Contact the HSE Manager for guidance on the potential need for assessment and clean-up of contaminated soil, groundwater or surface water. Note that any contaminated soil or water must be removed in accordance with existing environmental regulations, which include the requirement to use a provincially licensed waste hauler;
- For physical damage or equipment failure, do not use the system until it has been inspected by a professional engineer. Make all necessary repairs or replacements before returning the system to service;
- Participate to a post-mortem;
- Revise the emergency plan, as required.

8.5 Disposal

Depending on the nature and circumstances of the incident, various follow-up measures may be required, as follows:

- Dispose of the spilled material and residue in accordance with the applicable laws and regulations. If the spill residue is non-hazardous solid waste, it shall be transported directly to an approved waste disposal. All liquid and hazardous material collected must be managed directly from the site by an MOE approved carrier.
- If the spilled material is hazardous or liquid industrial waste, it must be registered with the Spills Action Centre.
- There may be some spilled materials which can be reclaimed and reprocessed. If this is so, be certain to ensure compliance while undertaking this action.
- Large Spill (> 100L), contact your external contact (Appendix 4) and coordinate the disposal with them.

9 Emergency Response Equipment

Here is the list of the materials that the sites and vehicles need to have:

One spill kit for the vehicle that will include:

- (10) sorbent Pads
- (4) sorbent socks
- (1) Neoprene Drain Cover
- (1) Disposal Bag
- (1) Repair Putty

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- (1) Pair of Goggles
- (1) Pair of gloves

Your permanent Spill kit on site can varied from a 30 gallon drum to a 95 gallon drum. The size of your Spill Kit will be determined by how far your sites are from the Emergency Response contractor.

One spill kit at every site (note that there can be one spill kit for more than one site in a distance of less than 20 kilometers):

- 30 gal, Over pack salvage drum,
- (50) universal pads,
- (2) universal large socks,
- (6) universal medium socks,
- (1) gal. Ensorb™,
- (2) Disposable Bags,
- (2) Ties,
- (2) Pairs of Nitrile Gloves,
- (2) goggles,
- (1) Tape,
- (2) cover all,
- (1) Anti-spark shovel,
- (1) Binder with the Spill Prevention Control & Countermeasure – Ontario, the Emergency Preparedness Response Plan of the site, SDS sheets of the hazardous materials that you have on site, emergency contact list, check-list of the material of the spill kits.

This list can varied depending on the needs of the site and the size of their container. If you are not sure of the size you need for your site, please contact the HSE Manager – Canada.

The location of the spill kits and the fire extinguishers are indicated in the site plan (Appendix 2).

10 Emergency Contact Information

All aspects of incident management will be managed through EDF's emergency management governance structure which is based on the Emergency Preparedness and Response Plan. Site-specific emergency contact information is included in the Appendix 4.

The Site Manager is informed, determines the level of the incident and informs the Area Manager and the HSE Manager as required. The Site Manager will provide all logistical and resource requirements including all related information gathering, dissemination, and communications support.

When an individual uses an emergency number, the Manager will identify himself and request:

- The location of the emergency (area);
- The type of emergency and assistance required;
- If there are injuries; and
- The caller's name, and the location where the call for assistance originated.

The Manager will contact emergency services/personnel within and outside EDF, in accordance with established EDF emergency procedures.

The Manager will continually monitor and coordinate all emergency response activities. This will provide for a consistent and efficient response by emergency services/personnel, while maintaining control of activities during emergency situations and providing EDF management with a focal point for current information about the emergency. It is also the responsibility

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of the Manager to fully inform, and subsequently update, the Area Manager and HSE Manager of actions taken to respond to emergency situations at these locations.

The emergency contact list is to be kept up-to-date by the Manager or their delegate (e.g. Safety Representative). The latest list of emergency contact information must be the same in the Emergency Response Plan binder.

See Appendix 4.

11 Training

All new employees will receive a copy of the spill prevention plan. They will also be provided with basic health and safety orientation including information regarding spill control procedures, location of the emergency response equipment and the first aid kits within one week of their being hired.

Spill response training including spill control drill will be provided annually for experienced staff and within three months of beginning for a new employee.

At least one trained employees first aid attendant is available at all times during each shift.

Workplace Hazardous Materials Information System training is also provided to all employees who are exposed or likely to be exposed to a hazardous material or controlled products.

Training associated with this emergency plan will consist primarily of the review and general familiarization with the emergency plan, emergency contact, location and use of on-site emergency response equipment.

Solar/Wind Technicians are familiar with the response procedure to petroleum oil alarm. PPE requirements, training and testing are covered by the HSE Manager.

12 Document History

Rev. #	Date	Reviser(s)	Approver(s)	Short Description of Revision
0	06/01/2017	Anne Valerie Dubois	Darin Rouse	New Document
1	02/08/2018	Veronique Godard	Amber Bell	Revision

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Appendix 1- Equipment, Product and Containment Details

Description of the operations related to the equipment covered by the spill prevention plan.	
Please list any details here	
Table 6.1 Equipment, Product and Containment Details	
Details	Please Fill Out
Type of Equipment	1
# of Units on Site	
Product Contained	
Volume (in Liters)	
Stored Inside/Outside	
Acceptable Range of Temp (High & Low in °C)	
Storage Temp (in °C)	
Secondary Containment	Yes / No
Type of Secondary Containment	
Recovery Basin Description	
Recovery Basin Capacity (in Liters)	
Are transfer area(s) for the product designed to contain spills?	
Are transfer area(s) for the product connected to a recovery basin?	Yes / No

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Applies to Audience / Specific Area:

All Ontario O&M employees

Issuing Department:

HSE

Written by:

Anne-Valerie Dubois

Date:

6/1/201

Revised By:

Veronique Godard

Rev. Date:

2/8/201

Rev. #:

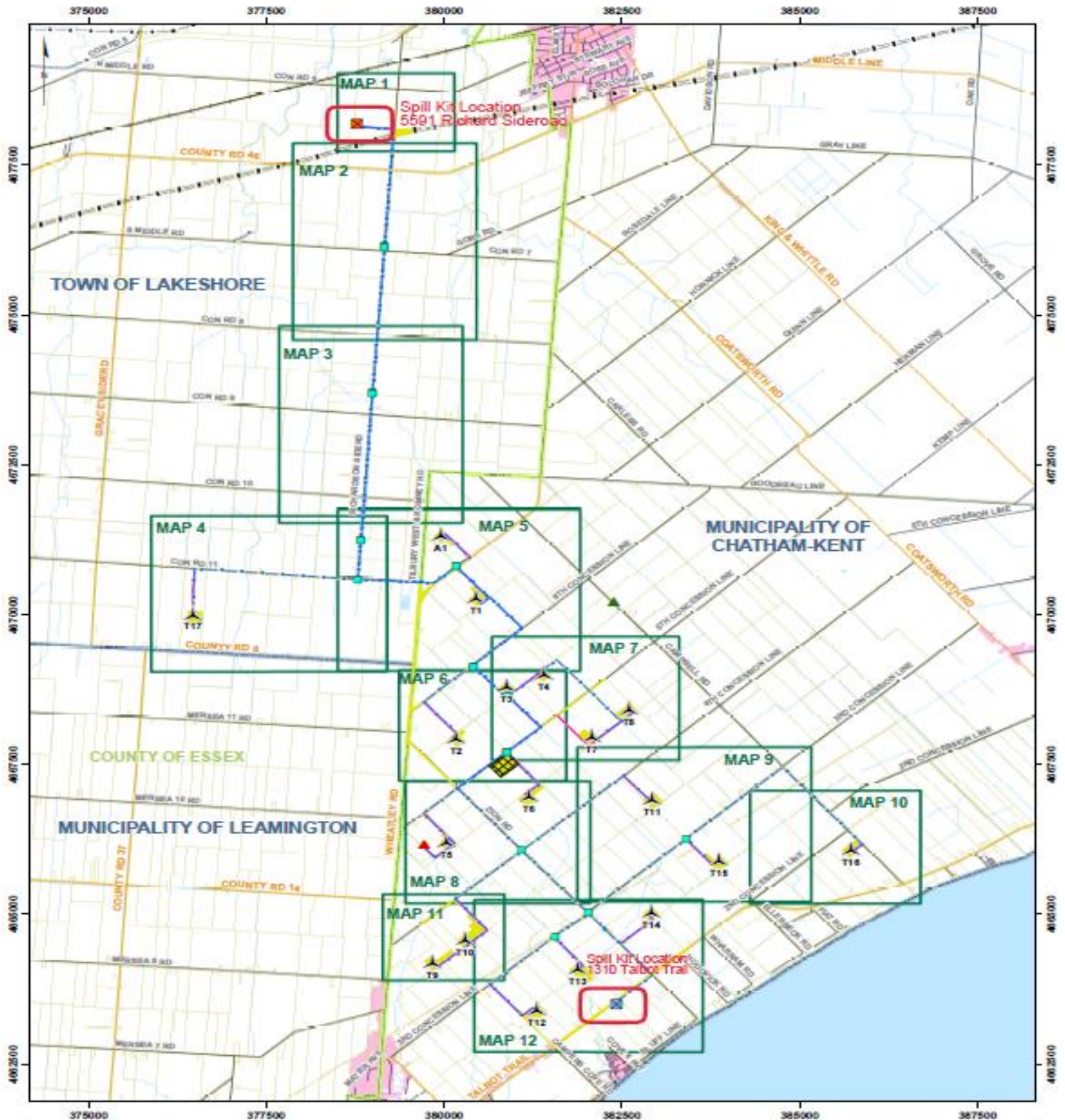
1

Status: Approved

By: Amber Bell

Appendix 2- Site Map

Insert your Site Map with the indication of where is the spill kit.



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Appendix 3 - Hazard Analysis

Insert SDS sheet of all the hazardous material that is permanently on site (Oil of the transformer, batteries, etc.)

See SDS Documents Online or Within the SDS Binder Located at the:

Romney Operations & Maintenance Building Located at

1310 Talbot Trail E Whealtley, Ontario N0P2P0

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Appendix 4

Emergency Contacts list

Internal Resources

Emergency Contact	Name	Number
Site Manager	John Stamatopoulos	M: 519-359-9525
Area Manager	Steve Lapointe	M: 418-209-6273
Site Safety Specialist		
HSE Manager	Amber Bell	M: 405-973-4313
HSE Coordinator		

External Resources

Emergency Contact	Name	Number
Fire/Police/Ambulance		911
Local Fire and Emergency Services Fire Prevention (Non-emergency day time)	City of Chatham Town of Wheatley	
Ontario Spills Line	MOE Spills Action Center	800-268-6060 416-325-3000
Ministry of Environment (MOE)		800-268-6060 416-325-3000
CANUTEC Spill Response Assistance	Canadian Transport Emergency Centre	888-226-8832 613-996-6666
Emergency Response Contractor for waste recovery, vacuum truck, cleaning crew	Safety Kleen	519-685-3040
Environmental Consultant (Qualified person)	Industrial Safety Trainers: David Ardito	705-792-0128
Client Representative		

Appendix 5

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Acknowledgement Sheet: to be reviewed and signed once a year.

Note that this information needs to be kept on site for 5 years, this is a requirement.

Employee name	Title	Date	Signature
John Stamatopoulos	Site Manager	20/27/2020	

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ATTACHMENT 4

Emergency Preparedness and Response Plan (EPRP) (EDF Renewables, January 2020)

4.3 Risk Level	Standard	Language	Country
N/A	4.7 EMERGENCY RESPONSE	EN	US/Canada/Mexico

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PURPOSE

Disasters are the consequence of inappropriately managed risk. These risks are the product of a combination of both hazards and vulnerability. In order to prevent loss from a disaster, an Emergency Preparedness and Response Plan (EPRP) must be developed, implemented and regularly tested.

The purpose of this Emergency Preparedness and Response Plan (EPRP) is to assist employees, sub-contractors, contractors, suppliers and management in making quality decisions during times of crisis.

This plan contains guidance in determining the appropriate actions to be undertaken to prevent injury and property loss, minimize hazards to human health and safety and to the environment from fire, explosion, or any unexpected release of hazardous materials to the air, soil, surface or groundwater, and natural or human disasters.

This document acts as a guideline in the event of an emergency. Every possible version of every imaginable scenario can never be captured in a usable document. The steps described may not occur in the same order at every site, every time, but this EPRP provides baseline directions on the most common steps necessary to address each situation listed.

SCOPE

This EPRP will serve as the baseline plan for employees and visitors in the event of an emergency. In situations where this plan runs in parallel with another entity's plan (for example a building manager, contractor, project manager, or customer) the plans shall be evaluated to determine if gaps exist, and management must coordinate to ensure effectiveness in the event of an emergency.

This plan applies to all EDF Renewables facilities, to include but not limited to: wind, solar, bio and office locations. UNLESS SPECIFICALLY STATED, THE TERM "HE" OR "SHE" SHALL REFER GENERICALLY TO AN INDIVIDUAL AND NOT A SPECIFIC GENDER.

ROLES AND RESPONSIBILITIES

While the Site Manager can develop and enforce appropriate procedures to follow in the event of an emergency situation, it is the responsibility of every employee to become acquainted with the EPRP prior to an emergency and respond accordingly.

1. Employees

Every employee shall take reasonable care to protect the health and safety of themselves and of other employees present and inform their manager of potential hazards present on site.

Every employee shall serve in the capacity of emergency first responder. Each employee shall be trained to the same level of first responder, and be trained in CPR, First Aid, and AED.

It is the responsibility of each employee to have a representative who has been properly trained and who understands his roles and responsibilities as a substitute. When the employee chooses his substitute, he must verify he has the training and authority to fulfill his role during an emergency.

2. EPRP Coordinator (CANADA SITES)

When an emergency situation occurs at the site, office and/or facility, the safety of employees and visitors will be coordinated by the EPRP Coordinator or his representative. The EPRP Coordinator shall be the Site Manager of the site, office and/or facility, and he shall name a person who will be able to be the Emergency Contact in case of his absence.

3. Site Manager

The site manager shall ensure that the employees under his care are present and safe in the event of an incident. He/she must ensure all employees are present after a Roll Call.

He/she must inform his/her employees about the risks related to their job.

He/she must ensure all employees have read and understand the site EPRP. He/she must make sure all the rescue equipment is available and in good condition.

He/she must ensure the EPRP is complete, up to date and distributed to the proper parties.

He/she ensures that the EPRP is used correctly and that emergency operations comply with current regulations (federal, provincial or state, corporate and local).

In the event where the SM is not located fulltime on a site, he/she designates an EPRP representative who will be responsible in case of emergency.

He/she ensures that material, financial and personnel resources are sufficient to enable the development and implementation of the EPRP and the implementation of the training program.

He/she ensures that action plans are executed to correct any non-compliance and to implement the recommendations of post-incident reviews.

In the event that the emergency creates off-site impacts, he/she will establish a center of claims (Canada).

In collaboration with the HSE Manager and other internal and external resources, he/she declares the end to an emergency.

4. Contractors, Sub-contractors and Visitors

The contractor or other entity makes available the skilled labor and equipment required during emergencies and collaborates with the site manager or designee for a prompt and effective response.

All contractors and sub-contractors must sign the Contractor Orientation acknowledgement before working on site, at least once a year or after a major update of the document.

DEFINITIONS

OSHA: Occupational Safety and Health Administration

CNPI: National Fire Code of Canada 2010

CSA: Canadian Standards Association

Defensible Space: An area around a building or other protected area in which vegetation, debris, and other types of combustible fuels have been treated, cleared, or reduced to slow the spread of fire to and from the building or protected area.

DRP: Disaster Recovery Plan

EMC: Emergency Measures Committee

EPRP: Emergency Preparedness and Response Plan

ERT: Emergency Response Team

ESS: Emergency Escape System (Emergency Rescue Kit)

HSE: Health, Safety and Environment

LDSS: Lightning Decision Support System

NFPA: National Fire Protection Association

OHS: Occupational Health and Safety

OR: Owner Representative

QHSE: Quality, Health, Safety and Environment

SDS: Safety Data Sheet

SM: Site Manager / Project Manager

WCB: Workers compensation board

PV: Photovoltaic

Wildfire: An uncontrolled fire in an area of combustible vegetation occurring in rural or low population density urban areas.

POLICY

1. Legal Requirements

This EPRP will meet the applicable requirements of federal regulation, including provincial or state legislation, as well as local regulations regarding emergency preparedness and response planning.

Failure to comply with this plan may result in disciplinary action up to and including termination. This plan will be reviewed at least annually by HSE and may be revised based on changes to federal, provincial or state and local regulations and requirements.

The present EPRP is aligned with:

- OSHA 1910.38 Emergency Action Plan Requirements
- Alberta, Occupational Health and Safety Code;
- Canada Occupational Health and Safety Regulations;
- CSA Z731-03 (R2014)- Emergency Preparedness and Response Standard;
- NFPA 1, Fire Code;
- NFPA 10 – Portable Fire Extinguishers
- Ontario, Occupational Health and Safety Act
- Quebec, Regulation respecting occupational health and safety; The EPRP foresees, among others:
- Development and application of a Fire Safety and Emergency Preparedness and Response Plan;'

2. EPRP Distribution

Every site will develop and maintain an individual EPRP. Sites that are serviced or maintained by the same group of personnel (for instance, adjoining solar sites) shall have an EPRP for each site.

The EPRP format will be determined by HSE and maintained on the document management system by Document Control.

All EPRP contact information and appendix pages for each facility / project must be updated annually. The updated contact page shall be sent to the Operations Control Center (OCC) and HSE. When a project EPRP is changed or information updated, the plan shall be updated and forwarded to the OCC and HSE within 72 hours.

Hard copies of the site EPRP shall be kept in a prominent location near the facilities main entrance. EPRP's shall be stored in a red binder that is not similar to other binders utilized at the site. This allows ready identification by any personnel on site. All site personnel shall be familiar with the EPRP location.

3. Training

Training is an important part of the EPRP. Training should be continuous and on a regular basis for employees and first responders to maintain their ability to use the emergency equipment and act appropriately in an emergency.

To ensure the instructions contained within the EPRP are properly followed during site/facility emergencies, a training program is to be developed and training provided to all employees, upon hire and after any changes in site/facility operations or layout. This training will be conducted yearly as part of the Payday Friday safety training program.

The training must include exercises appropriate to the work site that simulate the potential emergencies identified in the EPRP.

The effectiveness of the training sessions and the training program in general should be evaluated and documented on the [FORM, COURSE CRITIQUE](#). The critique shall evaluate what areas of the training need improvement, what should be sustained, and what can be done differently to improve the overall efficacy of the training.

Completed critiques shall be forwarded to the area HSE specialist within 72 hours of the completion of the training. HSE shall review each critique, evaluate the training and engage appropriate parties as necessary to address any mentioned shortcomings. HSE shall file the critiques in a site-specific folder on ECRM or the HSE drive.

Any suggested improvements to the training that merit follow-up or require long term implementation shall be entered into the corrective action database on ECRM for tracking to completion, by the HSE representative responsible for that site.

4. Drills and Exercises

To ensure that the site EPRP is adapted to meet current site conditions and that all involved individuals will respond properly, the EPRP will be tested on a regular basis (but not less than once per calendar year) by the site manager.

Practical exercises should be performed regularly in order to: train employees and test their skills, check the EPRP and its components and verify the efficacy of the emergency communication and organizational structure. These exercises should be regularly reviewed to identify and correct deficiencies.

An evacuation drill of the site must be performed at least once a year. To aid in these drills during a real emergency, a map of the facilities shall be posted at the site showing the escape routes, rescue evacuation kits, shelters, fire extinguishers, exits to be used during an evacuation and the designated assembly areas.

Annual site drills do not require the attendance or inclusion of local emergency services (fire department, emergency room, police, etc.).

New sites or newly acquired sites shall hold, upon site commissioning or when EDFR accepts responsibility for the site, a full drill that includes local emergency services. These drills shall, as accurately as possible, mimic a real-time rescue event and include and exercise as many rescue organizations as possible. Though not required, at the sites request HSE may manage and coordinate the execution of these drills.

Every 5 years, each site shall conduct a full drill that includes local first responders and emergency services.

Specific areas to be evaluated during the drills will include the following:

- Evacuation and accountability of personnel;
- Proper functioning of alarm system (if applicable), radios and/or phones;
- Special procedures for evacuation of personnel with special disabilities or impairments;
- Response time of emergency response personnel;
- Adherence to EPRP procedures.

The effectiveness of the training sessions and the training program in general should be evaluated and documented on the [FORM, COURSE CRITIQUE](#). The critique shall evaluate what areas of the training need improvement, what should be sustained, and what can be done differently to improve the overall efficacy of the training.

Completed critiques shall be forwarded to the area HSE specialist within 72 hours of the completion of the training. HSE shall review each critique, evaluate the training and engage appropriate parties as necessary to address any mentioned shortcomings. HSE shall file the critiques in a site-specific folder on ECRM or the HSE drive.

Any suggested improvements to the training that merit follow-up or require long term implementation shall be entered into the corrective action database on ECRM for tracking to completion, by the HSE representative responsible for that site.

5. Emergency Communications

In the event of an on-site emergency, the Site Manager, Local Manager or equivalent shall be deemed the Emergency Manager. The Emergency Manager is in charge of directing the local response to the incident until:

1. Relieved by competent first responders.
2. Relieved by a higher authority within the EDFR organization.
3. The emergency is resolved.

At the first notification of an emergency or crisis, the Emergency Managers priorities shall be:

1. Notification of first responders through 911 or area dispatch.
2. Scene Management. Assigning EDFR resources and employees to respond to the emergency as appropriate and safe, as directed in the individual response sections of this document.
3. Notification of the first level of management above the Emergency Manager.
4. Requesting additional resources as required.
5. Incident resolution
6. Reporting

Notification Tiers

After alerting appropriate first responders and dispatching EDFR resources, as time permits the Emergency Manager shall make notification to the tier of EDFR management above the Emergency Manager. This should be the only internal notification the Emergency Manager makes, as further notifications are taken by the higher tiers within EDFR. A typical tier system will follow the format found in Appendix 6: Emergency Communications Flowchart.

- **Tier 1: Emergency Manager.** The highest-level manager, or their designee, ON SITE who manages the emergency.
- **Tier 2: Area, Work Group, Facility or Equivalent Level Manager.** This is the Emergency Managers direct point of contact. Unless requested by the Emergency Manager, no other tier should have direct contact with the Emergency Manager, to allow them to focus on emergency management. The Tier 2 individual is responsible for contacting HSE and OCC as appropriate and obtaining additional EDFR resources as requested by the Tier 1.
- **Tier 3: Senior Manager or Director.** This tier is responsible for making the broader notifications to the senior management group within EDFR. They are responsible for communicating with Tier 2 and ensuring EDFR resources as requested by Tier 2 are implemented.
- **Tier 4: Executive Committee.** Upon notification of an emergency, this Tier conveys any required information to the CEO. This Tier is responsible for managing any potential company-wide effects of the emergency and ensuring that Tier 3 is made aware of any potential ramifications that need to be managed at the site level. This Tier is responsible for evaluating any effects the emergency may have on external stakeholders, and as required shall be the point of contact for any media outlets. Tier 4 personnel or their designees are responsible for making internal, company-wide incident notifications based on the severity chart found below.
- **Tier 5: External Stakeholders and Media.** This Tier does not have a direct link to the emergency but may drive the response through contractual requirements or opinion.

Internal Communications

Tier 4 personnel hold overall responsibility for communicating to the EDFR Renewables organization details concerning high profile incidents and emergencies.

In general, HSE will provide these internal communications in the form of Lessons Learned, Safety Notifications, and Incident Notifications. On occasion, an incident may rise to the level requiring direct communication from the CEO, such as in the event of a fatality or catastrophic equipment failure. In these instances, Tier 4 personnel will collectively decide the wording, format and responsible party for this communication.

Severity	Incident Types	Preliminary Report	Complete Investigation Report
LOW	Near Miss Minor Property Damage First Aid	X	
MEDIUM	Significant Near Miss/High Potential Incident Significant Property Damage	X	X
HIGH	Recordable Incidents (Fatality, Lost Time, Medical Treatment, Modified Work)	X	X

- Low Severity Incidents do not warrant any company-wide communications.
- Medium Severity Incidents may require routine company-wide communications based on investigation findings but typically do not require any communications on an emergency basis.
- High Severity Incidents require an initial event notification with any immediately known facts, as well as a follow-up notification following conclusion of the investigation and any legal review required.

6. Fire Prevention

Listed below are specific procedures that shall be addressed by the site to minimize the occurrence of, and impact from, a fire emergency. Special emphasis is placed on housekeeping and storage practices in all maintenance, shop, and general office areas where flammable and combustible materials are used and stored.

Fire prevention is the responsibility of all personnel. Employees shall follow safe practices to minimize fire hazards, and managers must ensure safe practices are followed daily. As an organization EDFR is committed to preventing the occurrence of fires and situations that may promote a fire at any site or facility.

INSPECTION OF FIRE PROTECTION EQUIPMENT

All fire protection equipment will be inspected monthly by the site manager or designee.

All areas at each site/facility will be inspected to check for unsafe conditions, such as blocked or locked fire exits, poor housekeeping, smoking in non-designated areas, flammable/combustible materials not stored properly and obstructed access to electrical rooms and panels, etc. All results will be recorded on the Facility Inspection Checklist (OM-01-5473).

FACILITY EMERGENCY ALARM SYSTEM

Not all jurisdictions, states or provinces require the presence of a fire alarm and/or fire suppression system.

As part of the annual drills, the fire alarm system (if equipped) shall be tested for functionality after alerting the alarm company (or fire department if directly monitored) of the drill.

For those sites who do not have a central facility alarm system, a method of communicating a fire hazard to all employees in a rapid and obvious manner shall be developed at the site. This method of notification may include radio, whistles, air horns or yelling (for example), provided that all potential occupants of the facility can be notified from a singular location, meaning the notification process does not require an individual to move through the facility making notifications.

CREATE A WILDFIRE PREVENTION PLAN

Area Managers in areas where wildfire poses a potential hazard (even limited times of the year) consult with their local BLM (Bureau of Land Management) office or other fire response entity to develop a site-specific Wildfire Prevention Plan (Appendix 7). This plan should include criteria for operations during high fire risk conditions, creation of Defensible Space, and other operational activities or restrictions to reduce the risk of igniting a wildfire. In addition, the plan should include site shutdown procedures, site evacuation, and protection of personnel and equipment in the event of wildfire.

The site **FACILITY OPERATING PLAN** will specifically indicate whether or not local conditions require a Wildfire Prevention Plan, as dictated in **WORK INSTRUCTION, FACILITY OPERATING PLAN**.

CREATE DEFENSIBLE SPACES

One of the cheapest and most effective ways of mitigating the effects of wildfire is by creating spaces around solar panels, transformers and turbines that is void of fuel (grasses, trees, brush). The concept of Defensible Space (also known as firescaping) reduces the risk of fire starting and/or spreading from one area to another on a property or site. By following the basic principles of Defensible Space, EDFR sites can reduce the risks associated with drought and wildfires

- 1) The primary principle of Defensible Space is fuel reduction. Minimizing dried grasses, vegetation and debris by early season weed abatement and regular ongoing maintenance will reduce combustible fuel mass onsite.
- 2) In fire-prone areas, cut dry weeds and grass in early morning hours when temperatures are cooler thus reducing the chance of sparking a fire. This is especially important in areas where there are rocks, and mower blades can hit rocks and create sparks which set fire to dried grasses.
- 3) When possible remove surface litter from cutting/mowing operations.
- 4) Ensure a perimeter which is "low, lean and green" around structures:
 - a) Offices
 - b) Substations
 - c) Transmission lines
 - d) Meteorological towers
 - e) Laydown yards
 - f) Solar arrays

- g) On-site fueling stations
- h) On-site LP storage
- i) Other areas that need protection or prevent fire from spreading to the surrounding community.

MONITOR WEATHER AND FIRE CONDITIONS

Current fire conditions are updated in real time on the US Geological Survey webpage (USGS Firemap), as well as the ArcGIS webpage (ArcGIS Fire Information).

7. FIRE

Employees and contractors shall notify the SM immediately upon discovery of a fire. Different types of fire will require different types of response.

GRASS, BRUSH AND FOREST FIRE

1. Evaluate the situation to determine if the fire can be extinguished safely with an extinguisher (if you have been trained on the use of an extinguisher). Prohibit access to the affected area by other employees.
2. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
3. The SM shall obtain details of the exact location and size of the fire from the Notifier.
4. The SM shall call 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
5. The SM will contact any land owners in the area with the location and size of the fire.
6. The first responders may be directed by the SM to visit any buildings / dwellings that may be in the anticipated path of the fire.
7. Only employees trained to fight fires may do so and only under instruction from the Civilian Authorities. In all other events, employees, contractors, and first responders shall at no time attempt to extinguish or "fight" a grass/brush fire. The employee/contractor role is to notify the SM and lead first responders to the scene. DO NOT attempt to fight a fire that has escalated beyond your training or your capabilities; you and only you can evaluate your capabilities, if you think the fire has escalated beyond your capabilities, leave!
8. Report to the nearest assembly (Muster point) area for roll call until "ALL CLEAR" is given or until directed to do otherwise. DO NOT run or create panic; DO NOT go to your car or leave the premises unless your safety is in danger.
9. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
10. Complete the Accident / Incident Report and call the HSE Manager as soon as all personnel are accounted.

IF CAUGHT IN THE FIRE OR HEAVY SMOKE:

- Take short breaths: breathe through your nose, then crouch under the smoke line to escape;
- Place a shirt or a cloth covering over your nose and mouth, if possible.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

TURBINE FIRE – NO PERSONNEL PRESENT

1. The employee discovering the fire shall immediately get the GPS coordinates of turbine.
2. Call the SM. The SM will manage the incident and implement the site fire plan if applicable.
3. The SM shall call 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
4. Employees, contractors, and first responders shall at no time attempt to go up tower to extinguish or “fight” a turbine fire. The employee or contractor role is to notify the SM and lead first responders to the scene.
5. Report to the nearest assembly (Muster point) area until “ALL CLEAR” is given or until directed to do otherwise. DO NOT go to your car or leave the premises.
6. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
7. Complete the Accident / Incident Report and call the HSE Manager as soon as all personnel are accounted.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

TURBINE FIRE – PEOPLE IN NACELLE, HUB OR ROTOR

1. If a fire occurs up tower while employees or contractors are working in the nacelle or hub immediately stop work, alert all others present, and if time permits, place equipment in a safe condition.
2. Evacuate Immediately.
3. Only employees trained to fight fires may do so. In all other events, employees, contractors, and first responders shall at no time attempt to go up tower to extinguish or “fight” a turbine fire. The employee or contractor role is to notify the SM and lead first responders to the scene. DO NOT attempt to fight a fire that has escalated beyond your capabilities; you and only you can evaluate your capabilities, if you think the fire has escalated beyond your capabilities, leave!
4. If necessary, provide rescue assistance to the person in the turbine. Do not place your own life at risk.
5. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
6. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
7. If you are caught in a fire while working in the Nacelle, Hub or Rotor:
 - a. In case of heavy smoke, crouch below the smoke line to get to the lowest point;
 - b. Take short breaths; breathe through your nose;
 - c. Place a shirt or a cloth covering over your nose and mouth, if possible;
8. If passage through the tower is impossible;
 - a. Stay calm, access the top of the turbine if possible and stay there until rescue personnel arrive;
 - b. Maintain communication with the ERT;
 - c. If necessary and possible, open hatches to ensure that fresh air is available.
 - d. If it is necessary to exit the turbine, choose the safest way out;
 - e. Reach the emergency escape kit;
 - f. Inspect the rescue equipment;
 - g. Locate the anchor point and attach the descent equipment.
 - h. Exit the turbine.
8. When EVERYBODY is out, have the turbine stopped remotely.
9. When outside, keep away from smoke and fire. Evacuate people to the closest safe area.
10. Complete the Accident / Incident Report and call the HSE Manager as soon as all personnel are accounted.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

FIRE AT THE OPERATIONS FACILITIES, BUILDINGS, OFFICES

1. In the event of a fire in the operations facilities, the employee discovering the fire shall immediately stop work.
2. Evaluate the situation to determine if the fire can be extinguished safely with an extinguisher. DO NOT attempt to fight a fire that has escalated beyond your capabilities; you and only you can evaluate your capabilities. If you think the fire has escalated beyond your capabilities, leave!
3. Activate the fire alarm and alert all employees in the building.
4. Prohibit access to the affected area to other employees;
5. The person discovering the fire shall immediately get the GPS coordinates or address of the facility.
6. Call the SM. The SM will take on the management of the incident and implement the site fire plan, if applicable.
7. Call 911 with GPS coordinates of meeting point location, the exact location and the size of the fire.
8. The Notifier to remain in a safe place near the incident until help arrives and to direct the first responders toward the fire;
9. Calmly form evacuation lines. Be ready to merge with other people evacuation building; close doors to offices and buildings as you leave;
10. If you are descending a stairwell, stay on the right side. Fire fighters use their right side when climbing stairs;
11. Keep talking to a minimum;
12. Listen for instructions and follow them;
13. Employees will assemble at the Muster Point until "ALL CLEAR" is given by the SM or until directed to do otherwise; DO NOT Return to building for personal items; DO NOT run or create panic; DO NOT go to your car, or leave the premises;
14. All employees, contractors and visitors shall remain clear of buildings and structures until an all clear notice is received from fire-fighting personnel;
15. If the SM present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
16. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.

If evacuation is necessary, use the emergency escape routes. See Appendix VII – Overall Site Map

FIRE IN A SOLAR POWER SYSTEM, INVERTER OR BATTERY

1. In the event of a fire in a Solar Power System, the employee discovering the fire shall immediately stop work. DO NOT attempt to fight a fire in a Solar Power System.
2. Activate the fire alarm and alert all employees at the site or near the solar power system.
3. Prohibit access to the affected area to other employees;
4. The person discovering the fire shall get immediately the GPS coordinates and ask for the shutdown of the utilities, including the electrical utilities to remove the electrical shock hazard.
5. Isolate and shutdown as much of the system as possible
6. Isolate the photovoltaic system at the inverter using reliable methods if possible and not hazardous.
7. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
8. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) with GPS coordinates of the Solar Power System, the exact location and the size of the fire AND inform the 911 operator that the emergency is a fire in a solar system or in a building equipped with a solar power system.
9. Inform emergency personnel about the system being a thermal system or a photovoltaic system as photovoltaic system includes electric shock hazard, while thermal system includes potential scalding from hot fluid.
10. The Notifier shall remain in a safe place near the incident until help arrives to direct the first responders toward the fire;
11. While salvage covers can be used to block sunlight, some electricity will still be generated unless they are made of material 100% light blocking. Care is needed to make sure that wind does not suddenly blow off any salvage covers covering panels. Foam is not effective in blocking sunlight and will slide off the solar array.
12. Employees will assemble at the Muster Point until "ALL CLEAR" is given by the SM or until directed to do otherwise;
13. Remain at the assembly area until directed to leave; All employees, contractors and visitors shall remain clear of the Solar Power System until an all clear notice is received from fire-fighting personnel;
14. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation is necessary, use the emergency escape routes. See Appendix VII – Overall Site Map

FALLEN, SWAYING OR BOUNCING POWER LINES

1. If an overhead power line has fallen to the ground, it may still be live. Keep well away – the current can travel along the ground, through objects such as fences or metal objects and through water or other liquid. You do not need to touch the power line to be killed or injured by it.
2. If you see a fallen power line stay well clear – ideally distance yourself by at least 10 meters / 33 Feet.
3. Call 911 or the local power provider.
4. Call the SM
5. If power lines fall on your car, it is safest to remain inside the vehicle. Do not touch the windows, doors, or anything metal such as the radio. Wait for trained professionals to rescue you. Warn anyone who starts walking towards the car to stay far away.
6. Use your horn to alert others.
7. If you are in a vehicle when a line falls, if it is safe to do so, remain in the vehicle until emergency services or local electricity provider says it is safe to get out. If you must get out of the vehicle because of fire, you must get out of the vehicle without touching metal and the ground at the same time.
 - a. Gently open the door all the way, being careful not to touch anything metal, and look for the flattest spot on the ground.
 - b. Position your body so that you are facing toward the ground.
 - c. When you jump, you will be more stable if you tuck in your elbows and keep your hands clasped. Jump off the car and land on both feet at the same time with your arms folded across your chest. Do not contact the vehicle and the ground at the same time with any part of your body or clothing.
 - d. Shuffle (or bunny hop - don't step) your feet across the ground until you reach a safe distance away from the car. A safe distance is considered at least 10 feet (3 meters). Keep your feet no further than 6 inches apart.
8. Your car may be pushed in the rear bumper by another car to attempt to remove the power lines and get your car away, if emergency circumstances dictate an immediate evacuation. Do not attempt this if there is not an immediate threat.
9. In the event the vehicle catches fire, DO NOT attempt to fight the fire. Only employees trained to fight fires may do so and only under instruction from the Civil Authorities. In all other events, employees, contractors, and first responders shall at no time attempt to extinguish or “fight” a fire in the presence of fallen electrical power lines. The employee or contractor role is to notify the SM and lead first responders to the scene
10. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.

ELECTRICAL FIRE IN SUBSTATION

1. In the event of an electrical fire inside the substation, the employee discovering the fire shall immediately stop work. DO NOT attempt to fight an electrical fire;
2. Activate the fire alarm and alert all employees at effected location.
3. Prohibit access to the affected area to other employees.
4. The person discovering the fire shall immediately get the GPS coordinates of the substation.
5. Call the SM. The SM will take on management of the incident and implement the site fire plan, if applicable.
6. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
7. Employees, contractors, and first responders shall at no time attempt to extinguish or fight an electrical fire. The employee or contractor role is to notify the SM and lead first responders to the scene.
8. Remote isolation of the substation should be requested, completed, and confirmed.
9. Transformers and capacitors contain flammable/combustible material and all personnel must remain in safe areas away from these potentially explosive sources.
10. IF CAUGHT IN THE FIRE OR HEAVY SMOKE
 - a. In case of heavy smoke, crouch below the smoke line to get to the lowest point then crawl to escape;
 - b. Take short breaths; breathe through your nose;
 - c. Place a shirt or a wet rag over your nose and mouth, if possible;
11. Employees will assemble at the Muster Point until "ALL CLEAR" is given or until directed to do otherwise;
12. Listen for instructions and follow them; DO NOT return to the substation for personal items; DO NOT run or create panic; DO NOT go to your car, or leave the premises;
13. If the SM present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
14. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

ELECTRIC SHOCK

1. In the event that an employee receives electrical shock, work at the location shall be stopped immediately.
2. DO NOT attempt to rescue the injured employee unless you know and verify no risks remain.
3. Electrical contact can cause muscle contraction, preventing the victim from releasing their grip on an electrical source.
4. Rescuing a shock victim at elevation or in the presence of high voltages is likely to require specialized training and tools to do safely. Don't attempt any rescue if you are not confident you can do so safely. DO NOT touch the injured employee
5. Remote isolation of the equipment should be requested, completed, and confirmed.
6. If de-energization is impossible, you may need to remove the victim from a live conductor. While this is never desirable, hazards can be controlled by utilizing tooling that won't conduct electricity (such as a wooden broom handle) to move the victim and donning insulating gloves and overshoes before attempting rescue if they are available.
7. If the only source of power to the victim's locale is a power cord or extension cord to portable equipment, simply disconnecting it at the power source may be sufficient. However, a trip to the breaker box to open the circuit may be necessary.
8. Call the SM. The SM will manage the incident.
9. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
10. Rescues are safest when the power is off, and you are standing on insulating material. Do not touch a shock victim unless you know the source of electricity that incapacitated them is powered down. If there is a risk of a neck injury or similar contingency, do not move the victim at all. Make sure the victim's airways are clear of obstruction, check for breathing and a pulse and provide CPR if necessary (provided you have been CPR trained).
11. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation was necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

EXPLOSION

1. In the event of an explosion, affected employees shall immediately stop working.
2. Activate the fire alarm and alert all employees at effected location.
3. Alert all others present, and if time permits, place equipment in a safe condition.
4. Prohibit access to the affected area to other employees;
5. The person discovering the explosion shall immediately get the GPS coordinates the exact location, the size, the source of the explosion and the nature of any involved hazardous material, if relevant.
6. If the source of the explosion is hazardous material, the Notifier must get the SDS in order to inform emergency personnel of the substance they will have to neutralize.
7. Call the SM. The SM will manage the incident and implement the site fire plan if applicable.
8. The SM shall contact 911 (if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
9. Employees, contractors, and first responders shall at no time attempt to extinguish or fight a fire due to an explosion. The employee or contractor role is to notify the SM and lead first responders to the scene.
10. The SM must ensure that no one was injured by flying debris and the debris didn't cause damage immediately threatening to life. An area of at least 500 meters from the blast site shall be investigated to verify any damage.
11. Employees must assemble at the Muster Point until "ALL CLEAR" is given or until directed to do otherwise.
12. Listen for instructions and follow them; DO NOT return to building; DO NOT run or create panic; DO NOT go to your car or leave the premises.
13. All employees, contractors and visitors shall remain clear of area and structures until an all-clear notice is received from fire-fighting personnel.
14. If the SM is present, he/she will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
15. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

8. LIFE THREATENING EMERGENCY MEDICAL

INJURY / ILLNESS – GROUND

1. In the event of an injury/illness requiring medical treatment, stop work. If time permits, place equipment in a safe condition, and alert others present.
2. The person discovering the injury/illness shall call 911 if condition is serious.
3. First aid may be administered, if trained and experience personnel are available at the accident location.
4. Unless a tower rescue is involved, do not move the injured or ill person.
5. Try to make them comfortable.
6. If the incident implies Hazardous Material, the Notifier must get the Safety Data Sheet (SDS) in order to inform the rescuer or the first responders of the substance they will have to neutralize.
7. Call the SM. The SM will manage the incident
8. The SM shall contact 911 (or relevant local authority as appropriate, if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
9. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted.

TOWER EMERGENCY RESCUE

1. In the event of a medical emergency while up tower, work shall immediately be stopped.
2. Immediately notify the SM.
3. Address any potentially hazardous situations for rescuers (i.e. turbine yawing, pinwheeling, etc.).
4. To the maximum extent that your training and knowledge allow, treat the victim.
5. If victim is able to safely remove himself from the tower, immediately begin a supervised descent of the tower. Do not leave the injured alone.
6. The SM shall contact 911 (if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
7. If the incident implies Hazardous Material, the SM must get the Safety data sheet (SDS) in order to inform the rescuer or the first responders of the substance they will have to neutralize.
8. The SM shall notify all other employees on the site who are trained in tower rescue. All employees shall acknowledge the emergency, and as quickly as safely possible respond to the tower where the emergency is located.
9. If safe, the senior rescuer at the tower coordinates the response of the rescuers.
10. Refer to the tower rescue procedure for specific response guidelines. In general, one person remains at the base of the tower while all over capable rescuers ascend the tower to assist in the rescue.
11. Once the injured is on the ground, ensure that first responders and medical services have prompt access to them.
12. Complete the Accident / Incident Report and place a phone call to the HSE Manager as soon as all personnel are accounted for.

9. CRIMINAL BEHAVIOR

It is the responsibility of all employees, contractors and visitors to immediately notify the SM of sabotage, potential sabotage or suspicious activity.

SABOTAGE OR SUSPICIOUS ACTIVITY

1. In case of sabotage or suspicious activity, call the SM.
2. The SM will call 911
3. If sabotage occurs at generating units, transmission facilities, electric collection systems, the operational telecommunication, or control devices associated with generating units, transmission facilities, or electric collection systems the SM shall report the occurrence to OCC and HSE.
4. Do not confront or attempt to detain trespassers or attempt to intervene with suspicious activities. If an immediate threat exists, contact 911 (if not already done)
5. Investigation into suspicious individuals may require conversation with the individual to ascertain that person's connection with the site. At no time should any confrontation be allowed. If suspicious individuals seem hostile or violent, employees shall leave the area and inform the SM.
6. Complete the Accident / Incident Report

EMPLOYEE, CONTRACTOR OR VISITOR

Confrontational situations between employees, contractors, or visitors involving threats, harassment, confrontations or obscene acts or language shall be reported immediately to the SM.

THIRD PARTY THREATS TO FACILITIES

1. In the event there is a threat to employees or the site, immediately STOP WORK, alert all others present, and if time permits, place equipment in a safe condition.
2. Call the SM to initiate the Evacuation Procedure
3. Call 911 for assistance.
4. Once all employees have been accounted for, the SM will report the site evacuated to authorities.
5. Upon "ALL CLEAR" notification from law enforcement, employees may return to site facilities.
6. Complete the Accident / Incident Report and place a phone call to the HSE Manager.

ACTIVE SHOOTER

1. In the event of an active shooter, affected employees shall immediately stop working.
2. Call 911 – (from an area of safety or concealment) and provide as much of the following information as possible:
 - a. Description of suspect(s) and possible location.
 - b. Number and the types of weapons.
 - c. Suspect's direction of travel.
 - d. Location and condition of any victims.
3. Evacuate – If there is an accessible escape path, attempt to evacuate the premises. Be sure to:
 - a. Have an escape route and plan in mind.
 - b. Evacuate regardless of whether others agree to follow.
 - c. Leave your belongings behind.
 - d. Help others escape, if possible.
 - e. Prevent individuals from entering the active shooter area.
 - f. Keep your hands visible.
 - g. Follow the instructions of any police officers.
 - h. DO NOT attempt to move wounded people.
 - i. Call 911 when you are safe.
4. Hide – If evacuation is not possible, hide. Your hiding place should:
 - a. Be out of the shooter's view.
 - b. Provide protection from gunshots, such as behind a heavy desk.
 - c. Not trap you or restrict your options for movement (broom closet).
 - i. Lock the door;
 - ii. Block the door;
 - iii. Silence cell phones;
 - iv. Remain Quiet.
5. FIGHT – If no other options exist, and there is imminent/immediate danger to yourself, take direct action against the shooter:
 - a. Remain calm.
 - b. If you have not already done so, call 911 and leave the line open.
 - c. Commit to your actions.
 - d. Act as aggressively as possible against the shooter.
 - e. Move with speed and force. Improvise weapons if time permits.
 - f. Continue to fight until the shooter is physically incapacitated.
6. Once shooter is incapacitated leave the area immediately, taking as many people as possible with you.
 - a. Keep hands visible.
 - b. Do not group together once outside the building, in the event of a second shooter.
 - c. Follow all commands of law enforcement officials.
7. Regroup – When possible and safe to do so, account for all personnel and report this information through one person to law enforcement. Conduct a roll call.
8. Report – As soon as possible and practical, report the incident through the EDFR reporting chain (immediate Supervisor, site manager, and Area Manager).

BOMB THREAT

1. A bomb threat should never be taken lightly; though experience shows that most bomb threats are false alarms. EDFR will consider all bomb threats to be valid.
2. Under no circumstances are employees allowed to engage in any physical search activities.
3. Under no circumstances are employees allowed to enter the building site, until condition is deemed safe by authorities.
4. The use of electrical equipment, radio communication devices, pager or cell phones should be avoided because they produce waves that could trigger the detonation of the bomb. Keep cell phones and pagers closed.
5. When initial threat is received / discovered, gather as much information as possible from the caller using the protocols outlined in the BOMB THREAT INFORMATION LIST. APPENDIX 3 – Bomb Threat Information List.
6. Stop Work! Notify all employees
7. Follow building / Site evacuation procedures and reconvene at defined Muster Location. See APPENDIX 2 – Overall Site Map
8. Call 911 to report the threat and follow instructions given by authorities and cooperate with local officials.
9. Call HSE Manager as soon as possible to report the event.
10. Employees must not make statements to the press regarding bomb threat incidents. Refer to 12.9 Media Instructions.
11. All employees must remain at assembly areas until “ALL CLEAR” is given by the SM or until directed to do otherwise.
12. Complete the Accident / Incident Report and place a phone call to the HSE Manager.

10. SEVERE WEATHER, MONITORING, AND RESPONSE PROCEDURES

Severe weather includes, but is not limited to, strong winds, lightning, hail, ice, snow storms, and tornadoes.

Please refer to the Working in Extreme Weather and Environmental Hazards Procedure.

STRONG WINDS

13. If possible, objects and equipment that may be carried by the wind should be transferred to a building or secured.
14. Ensure that the emergency brakes are applied on all vehicles.
15. Cover electrical equipment with tarpaulins.
16. All staff must go inside a building or a shelter.
17. Be prepared in case of a power outage.
7. The SM shall monitor weather to provide advance warning of potential strong wind conditions.

LIGHTNING

1. See procedure Working in Extreme Weather and Environmental Hazards Procedure
2. No one shall commence a climb during a lightning event.
3. The SM shall issue an "All Clear" notice when no lightning has been detected at the work site within 30 miles for 30 minutes. An all clear will also be given when the lightning is greater than 60 miles from the site for 30 minutes.
4. If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

FLOOD

1. When a flood occurs, immediately STOP WORK, alert all others present, and if time permits, place equipment in a safe condition
2. Stay current with the weather conditions; Listen to the radio or check via internet for current information in your area.
3. Call your SM
4. Notify the HSE Manager
5. Watch for distant thunderheads, for likely source of flash floods.
6. Notify your employees via radio, intercom, or phone.
7. Cooperate with local officials. Respond to requests for assistance from local police, firefighters and relief workers.

ON THE ROAD

1. If you are "downhill" from thunderstorm activity, be prepared to stop on high ground. Water-filled highway dips are difficult to see while driving.
2. Drive at a moderate speed and monitor other vehicles around you.
3. If your vehicle stalls in a water, abandon the vehicle and move to higher ground if safe and possible. Later walls of water may engulf your vehicle.
4. Turn on emergency flashers and do not return to your vehicle until it is safe to do so.
5. DO NOT attempt to cross a stream where water is above your knees.
6. DO NOT try to drive over a flooded road. The water can be much deeper than it appears, and you could be stranded or trapped.
7. DO NOT try to drive around lawfully placed barricades.
8. Stay away from drains and ditches that may have the opportunity to collapse.
9. When driving into areas where flash floods are possible, inform someone of your itinerary and expected time of return. Stick with you plan and check in when you return.
10. Carry a portable radio or use your cell phone to keep alert to weather conditions.
11. If your vehicle is damaged or stalled, stay near it on high ground Search and rescue parties will locate a vehicle more quickly than a person.

OFFICE OR FACILITY

If you must evacuate, you should do the following if it is safe to do so, and time permits:

- Move essential items to an upper floor.
- Turn off utilities at the main switches or valves, if instructed to do so.

- Disconnect electrical appliances.
- Do not touch electrical equipment if you are wet or standing in water.

Employees and contractors shall make safe, any equipment being worked on, exit the field and meet at the designated inside assemble area (if possible).

If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.

If evacuation is necessary, use the emergency escape routes. Appendix 2 – Overall Site Map

Complete the Accident / Incident Report and place a phone call to the HSE Manager.

WINTER STORMS / ICING / HAILING / FREEZING RAIN

1. The SM shall monitor ice potential to provide advanced warning of potential icing conditions or winter storms.
2. Employees shall stay aware of potential weather conditions by using weather monitoring provider advanced warning notifications.
3. If a winter storm or blizzard warning is issued by third party weather information provider, the SM or designee shall notify all employees adverse weather conditions exist within a 30-mile radius and shall issue a warning to employees and contractors in the field upon which all personnel shall stop work.
4. Employees and contractors shall make safe any equipment being worked on (if possible), exit the field and meet at the inside assembly area.
5. If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

TORNADO / HURRICANE

1. The SM shall monitor the weather to provide advanced warning of potential tornado generating conditions to employees and contractors prior to starting field work.
2. If a tornado watch is issued through a weather service, this means a tornado is possible.
3. The SM shall call employees at the facility site, via radio, cell phone or any other available means to alert them of a tornado watch. The weather monitor or SM shall issue a tornado watch to employees and contractors in the field. The SM shall ensure receipt of tornado watch by employees and contractors in the field and issue an instruction to Stop Work.
4. Employees shall make safe any equipment being worked on (if possible), exit the field and meet at the designated inside assembly area. If a tornado warning is issued this means that a funnel cloud has been spotted or is strongly indicated on radar. The SM shall issue an immediate instruction to reach the O&M building. People will meet in the reception area for head count and seek shelter in the designated tornado shelter.

The following should be briefed to employees during the tailboard meetings in storm season.

If employees and contractors are unable to reach a designated shelter, the following actions shall be taken:

If in a building, go to interior rooms and halls on the lowest floor. Stay away from glass-enclosed places or areas with wide-span roofs such as warehouses. A corner is safer than the middle of the wall. A bathroom, closet, or room with short length walls is the safest area, especially if on the north or east side of a building. Crouch down and cover your head.

If in a vehicle, do not try to speed away from a tornado. Tornadoes can change direction quickly and can lift a car or truck and toss it through the air. Get out of the vehicle immediately and take shelter in a nearby building. If there is no time to get indoors, get out of the car and lie in a ditch or low-lying area away from the vehicle and protect your head with your arms. Be aware of the potential for flooding.

If in a turbine, employees and contractors shall descend immediately and take cover on the floor of the turbine or turbine basement, if available. Do not attempt to drive to a building.

After a tornado has passed through the facility, the SM shall issue an "All Clear" notice.

Employees, contractors and visitors will meet at the inside assembly area for roll-call. All employees, contractors and visitors shall be accounted for before anyone leaves the facility.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

Complete the Accident / Incident Report and place a phone call to the HSE Manager.

EARTHQUAKE WHILE IN A TURBINE

1. If an earthquake occurs while you are in the nacelle, immediately stop work, alert all others present, and if time permits, place equipment in a safe condition.
2. You are safe in a turbine during an earthquake. Remain in the nacelle until the earthquake stops. Avoid using the ladder during the earthquake.
3. Once the shaking stops, immediately evacuate the turbine.
4. Once on the ground:
 - a. Get into the open.

- b. Stay clear of power lines.
 - c. Move away from buildings, streetlights and utility wires.
 - d. Avoid roads and bridges or ramps that may have been damaged by the earthquake.
 - e. If near the ocean or water, reach high ground or go inland.
 - f. If possible, employees shall make safe any equipment being worked on, and meet at the designated inside assembly area.
5. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
6. Complete the Accident / Incident Report and place a phone call to the HSE Manager.

EARTHQUAKE WHILE ON THE GROUND

1. If an earthquake occurs while employees or contractors are working on the ground, immediately stop work, alert all others present, and if time permits, make safe any equipment being worked on, shut the gas and electricity off.
2. If indoors:
 - a. MINIMIZE your movements to a few steps to a nearby safe place.
 - b. DROP to the ground.
 - c. Take COVER by getting under a sturdy table or other piece of furniture.
 - d. HOLD ON until the shaking stops.
 - e. If there isn't a table or desk near you, cover your face and head with your arms and crouch in an inside corner of the building or under the door frame.
 - f. Stay away from glass, windows, outside doors and walls, and anything that could fall, such as lighting fixtures or furniture.
 - g. Use a doorway for shelter only if it is in close proximity to you and if you know it is a strongly supported load bearing doorway.
 - h. Stay inside until the shaking stops and it is safe to go outside;
 - i. DO NOT use elevators.
3. If outdoors:
 - a. Get into the open.
 - b. Stay clear of power lines.
 - c. Move away from building, streetlights and utility wires.
 - d. Once in the open, stay there until the shaking stops. The greatest dangers exist directly outside buildings, at exits and alongside exterior walls.
 - e. Check for ground movement.
 - f. If in a moving vehicle STOP as quickly as safety permits and stay in the vehicle. Avoid stopping near or under buildings, trees, overpasses, and utility wires.
 - g. Proceed cautiously once the earthquake has stopped.
 - h. Avoid roads and bridges, or ramps that might have been damaged by the earthquake.
4. If near ocean or water, reach high ground.
5. If trapped under debris:
 - a. DO NOT light a match.
 - b. DO NOT move about or kick up dust.
 - c. Cover your mouth with a handkerchief or clothing.
 - d. Tap on a pipe or wall so rescuers can locate you.
 - e. Shout only as a last resort, as shouting can cause you to inhale dangerous amounts dust.
6. After the shaking stops
 - a. Attempt to contact employees and SM to report alive and safe.
 - b. Call 911, if assistance is needed.
 - c. Attempt to locate employees needing help and report your co- workers alive to the SM.
 - d. Call for help for yourself and/or co-workers, if needed.
 - e. If possible and safe, attempt to reach the MUSTER POINT.

7. If the SM is present, he/she will perform a roll call to confirm all personnel are accounted for, if not, process the roll call on your own.
8. Complete the Accident / Incident Report and place a phone call to the HSE Manager.

11. ENVIRONMENT

For purposes of the EPRP, a spill is defined as the unintentional release of any chemical in excess of 15 gallons, regardless of location, hazard rating or surrounding circumstances.

SPILLS – HAZARDOUS OR NON-HAZARDOUS MATERIAL

If a spill occurs, immediately Stop Work, alert all others present, and if time permits, make safe any equipment being worked on.

- Confine the spill, prevent chemical from spreading and entering the drainage system. Stop the spill from becoming worse by shutting down pumps, closing valves or clamping broken hoses;
- Try to contain the spill from spreading further through diking or other means;
- Add neutralizing agents and/or absorbents;
- Inform the SM.
- Be prepared to show the SDS.

DO NOT attempt to handle any spilled material that you cannot identify (assume it is hazardous)

Complete the Spill Report and place a phone call to the HSE Manager.

12. MEDIA

EDF Renewables recognize that it is essential to present accurate information to the news media concerning an emergency situation involving any of our sites or facilities.

1. You are not permitted to give any information, good or bad, to the media.
2. The SM will contact the EDFR communications team to speak with the media.
3. If a journalist or any other person that is not an authorized person ask you a question, you must politely and professionally answer: Please contact the Site Manager. He/she will give the name and phone number of the person in charge of communications.

REFERENCES

ECRM (FDCC)

- Form, FO5473 Facility Inspection Checklist
- Form, FO0105 EPRP Contact Form
- Form, 5385 Course Critique

EXTERNAL

- OSHA 1910.38 Emergency Action Plan Requirements
- Alberta, Occupational Health and Safety Code;
- Canada Occupational Health and Safety Regulations;
- CSA Z731-03 (R2014)- Emergency Preparedness and Response Standard;
- NFPA 1, Fire Code:
- NFPA 10 – Portable Fire Extinguishers
- Ontario, Occupational Health and Safety Act
- Quebec, Regulation respecting occupational health and safety

DOCUMENT HISTORY

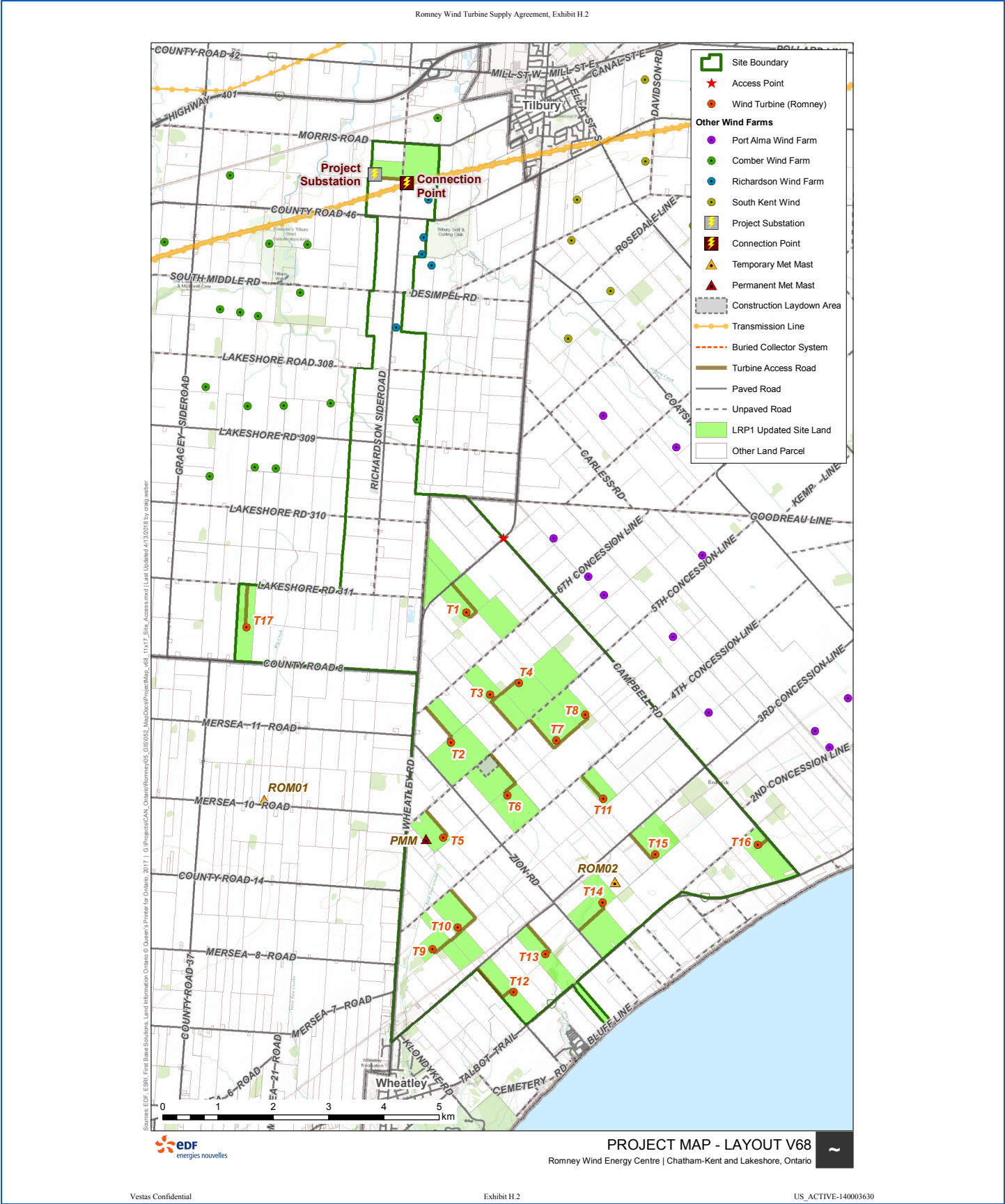
Rev #	R&E ID	Author	Owner Approval	Date	Update Notes
0	-	Solange McElreavy Consulting	Darin Rouse	3/8/2015	New Document
1	-	Beth Beaudet	Darin Rouse	9/3/2016	-
2	-	Chris Lenda	Amber Bell	11/7/2017	Updated contact numbers, responsibilities, supervisor references & added additional location fields.
3	-	Chris Lenda	Amber Bell	1/15/2019	Added data and form tracking requirements. Removed pictograms, streamlined document, clarified references.
4	-	Mike Smith	Amber Bell	12/30/2019	Add fire prevention section & appendix.

DOCUMENT PROPERTIES & APPROVAL HIERARCHY (CLICK TO COLLAPSE OR EXPAND AS NEEDED)

APPENDIX 1: FLOOD HAZARD MAP

(Insert flood or earthquake map, if any)

APPENDIX 2: OVERALL SITE MAP AND EVACUATION ROUTES



APPENDIX 3: BOMB THREAT INFORMATION LIST

WHEN BOMB THREAT IS RECEIVED

1. Listen
2. Be calm and courteous
3. Do not interrupt the caller
4. Obtain as much information as possible
5. Complete this form and give it to your supervisor

EXACT WORDING OF THREAT

TELEPHONE CALL INFORMATION

DATE	TIME	DURATION OF CALL
	☐ AM ☐ PM	

QUESTIONS TO ASK

What time is the bomb expected to explode?	
Where is it?	
What does it look like?	
Where are you calling from?	
Why are you placing a bomb here?	
What is your name?	

IDENTIFYING CHARACTERISTICS

Gender	☐ Male	☐ Female	☐ Not Sure
Estimated Age	[] ENTER AGE	☐ Adult	☐ Young Adult ☐ Teen
Accent	☐ English	☐ French	☐ Spanish ☐ Other
Voice	☐ Loud	☐ Soft	☐ Other ☐ Other
Speech	☐ Fast	☐ Slow	☐ Normal ☐ Other
Diction	☐ Normal	☐ Nasal	☐ Lisp ☐ Other
Manner	☐ Emotional	☐ Calm	☐ Vulgar ☐ Other

OBSERVATIONS

Background noises	
Voice was familiar (specify)	
Caller was familiar with area	

THREAT RECIPIENT'S PARTICULARS

Name	Phone Number

APPENDIX 4: MAP OF THE DIRECTIONS TO THE MEDICAL CARE CENTER

2/27/2020

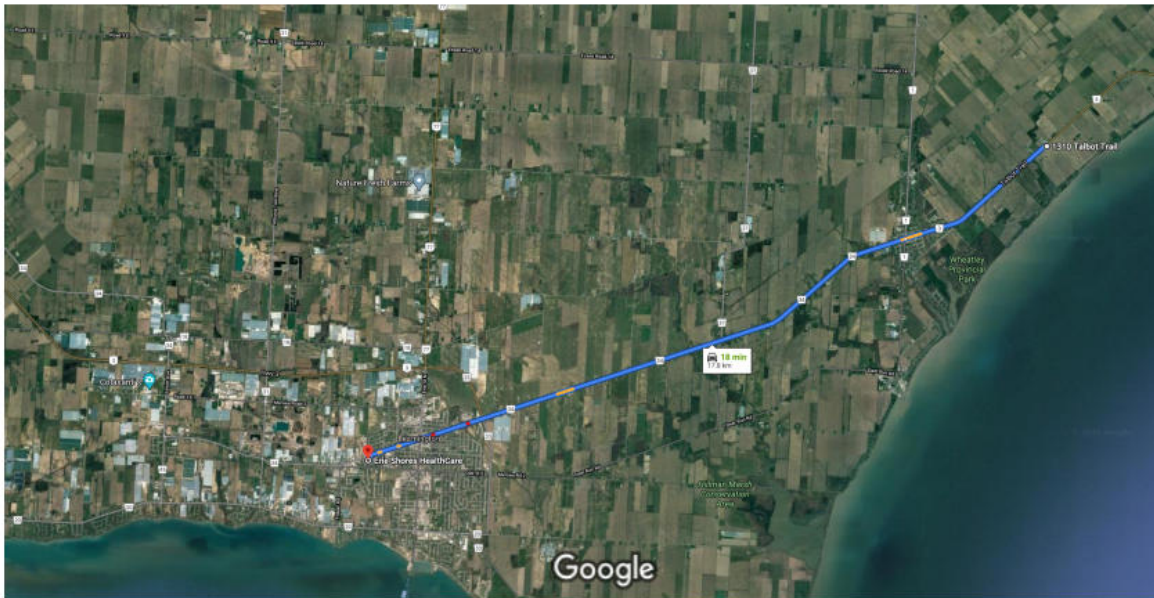
1310 Talbot Trail, Wheatley, ON to Erie Shores HealthCare - Google Maps

Google Maps

1310 Talbot Trail, Wheatley, ON to Erie Shores HealthCare

Drive 17.8 km, 18 min

Map of directions to Medical Center from Romney Energy Centre LP



Imagery ©2020 CNES / Airbus, Landsat / Copernicus, Maxar Technologies, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2020 1 km

1310 Talbot Trail

Wheatley, ON N0P 2P0

- ↑ 1. Head southwest on Chatham-Kent County Rd 3 toward Campers Cove Rd
4.0 km
- ↑ 2. Continue onto Talbot Rd W/County Rd 34 W
13.6 km
- ↙ 3. Turn left onto Fader Ave
98 m
- ↘ 4. Turn right
15 m
- ↙ 5. Turn left
8 m
Destination will be on the right

Erie Shores HealthCare

194 Talbot St W, Leamington, ON N8H 1N9

APPENDIX 5: GPS

Substation Name	Latitude (N)	Longitude (W)
Romney SS	42.245373	-82.463205
5591 Richardson Side Rd		

O&M Building	Latitude (N)	Longitude (W)
1310 Talbot Trail	42.115076	-82.422367

Solar Site Name	Latitude (N)	Longitude (W)
N/A	N/A	N/A

Meeting Point	Latitude (N)	Longitude (W)
O&M Building	42.115076	-82.422367

Muster Point	Latitude (N)	Longitude (W)
O&M Building	42.115076	-82.422367

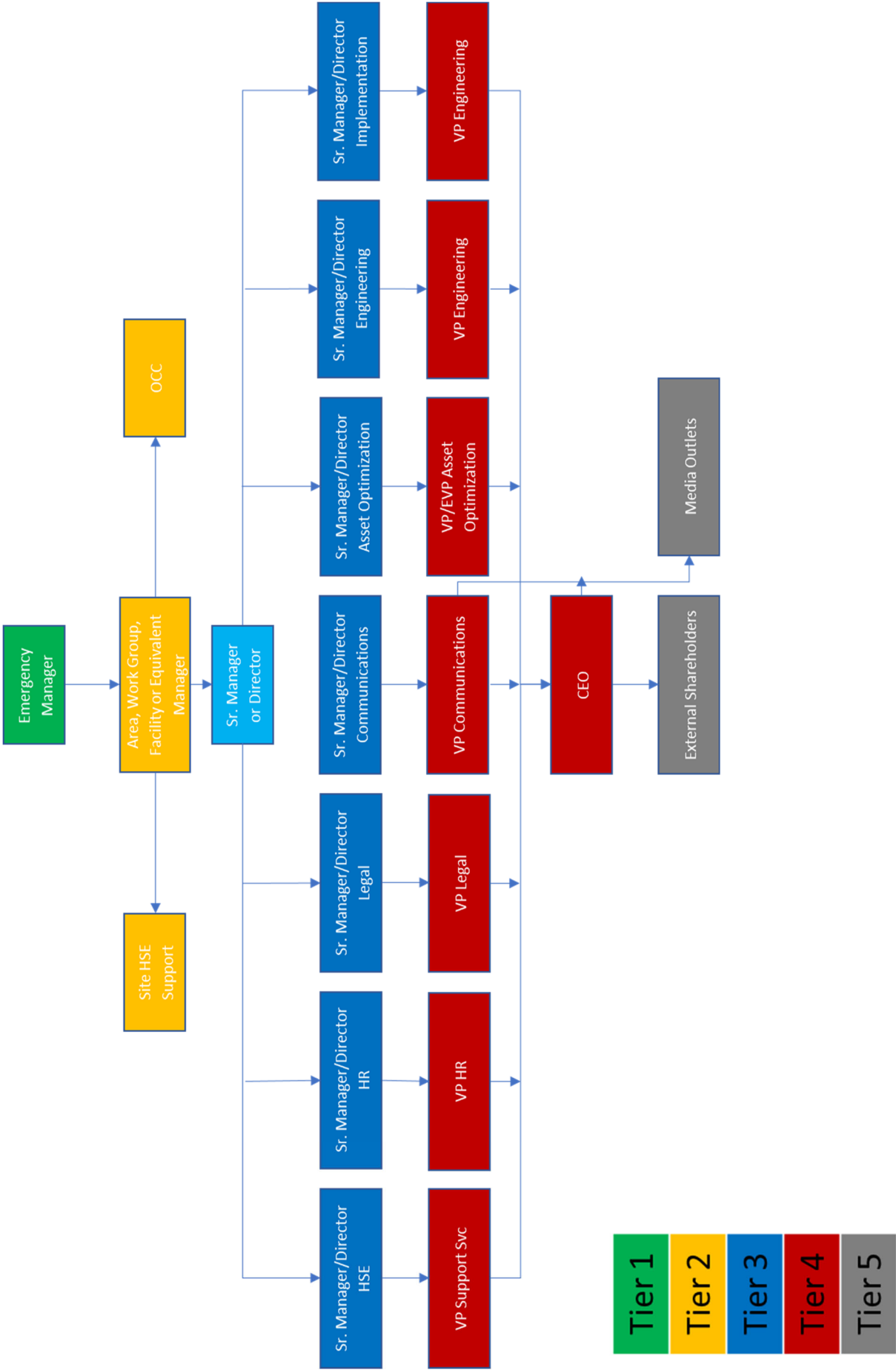
Equipment Number or Identifier	Latitude (N)	Longitude (W)
WTG 1 / 226332	42.17532819	-82.44749623
WTG 2 / 223333	42.15409192	-82.45037524
WTG 3 / 226334	42.16201235	-82.44199159
WTG 4 / 226335	42.16399002	-82.43572171
WTG 5 / 226336	42.13860494	-82.45170139
WTG 6 / 226337	42.14563682	-82.43783484
WTG 7 / 226338	42.15470706	-82.42737047
WTG 8 / 226339	42.15897125	-82.42109114
WTG 9 / 226340	42.12037325	-82.45367385
WTG 10 / 226341	42.12400275	-82.44821349
WTG 11 / 226342	42.14535622	-82.41682797
WTG 12 / 226343	42.11356932	-82.43573158
WTG 13 / 226344	42.11989907	-82.42891307
WTG 14 / 226345	42.12843319	-82.41662393
WTG 15 / 226346	42.1364129	-82.40528211
WTG 16 / 226347	42.13826644	-82.38287472

[illegible]

[illegible]

[illegible]

APPENDIX 6: EMERGENCY COMMUNICATIONS



APPENDIX 7: FIRE PREVENTION PLAN

This plan includes references to relevant EDFR-AO Work Instructions.

The **FACILITY OPERATING PLAN** must state the existence or lack of existence of this plan.

1. Fire Response Entities Consulted

Chatham-Kent Fire Station 20
130 Talbot Rd, Wheatley, ON N0P 2P0
(519) 825-7693

2. Weather and Fire Condition Monitoring

Indji Watch Client

3. Operations Actions/Restrictions During High Fire Risk

4. Defensible Space Plan

5. Site Shutdown During Active Fire or High Fire Risk

6. Alarm/Communication Plan

7. Fire Evacuation Plan

8. Protection of Personnel and Equipment During Fire