



9. EMERGENCY RESPONSE AND COMMUNICATIONS PLAN

DWP will create and Emergency Response and Communications Plan (ERCP) to manage emergencies at the project location for the construction, operations and decommissioning phases of the project. The plan will outline how the project, public and local municipalities will communicate with each other during a period of emergency and during normal operations. A detailed Response Plan will be available to regulatory agencies, County of Dufferin, the Townships, local residents and aboriginal communities. The plan will be developed in consultation with local emergency services and will form part of the Environmental Management and Protection Plan, which is being prepared as part of the detailed design phase of the project.

The ERCP will cover the wind farm's construction, operation and decommissioning activities and will be organized into Emergency Response and non-Emergency Communications.

9.1 Emergency Communications

The ERCP will be developed in cooperation with Dufferin County, local municipalities and provincial authorities and implemented prior to the start of construction.

If there is an emergency, first responders (Police, Fire, and Ambulance) will be contacted via the 911 Operator. Emergency responders will then be expected to respond following their established procedures and guidelines, referring to the Emergency Response Communications Plan (ERCP) and Emergency Action Plan (EAP) agreed to with Dufferin Wind Power Inc. In the rare instance that the wind farm exceeds operational parameters and potentially unsafe situation may arise, the person observing the situation may report the circumstances to 911, or alternatively contact a designed wind farm representative. For the purpose of the REA, questions regarding emergency communications may be directed to:

Jeff Hammond, Senior Vice President
Dufferin Wind Power Inc.
161 Bay Street, Suite 4550
Toronto, ON M5J 2S1
Phone: 416-551-2578
Fax: 416-551-3617
Email: jeff.hammond@clypg.com.cn



Permanent emergency contact signs will be posted and emergency contact numbers will be established as agreed to with Dufferin County, Melancthon Township, and surrounding municipalities. Should an incident occur, the following will be contacted by phone or in person within four hours or sooner of the occurrence of the operational exceedance/emergency. An incident report of the incident will be submitted to the same organizations within 24 hours of first notification and on an ongoing basis until the incident is resolved:

- The Ministry of Environment (including spills action Centre, if applicable)
- Dufferin County (including road and service boards)
- Melancthon Township (Designated representative and roads supervisor).

The following organizations or stakeholders will be contacted by phone or in person within four to eight hours of the occurrence of the operational exceedance/emergency and a copy of the incident report of the incident will be made available for their review:

- Local community members
- Aboriginal communities as applicable.

9.2 Non-Emergency Communications

Regulatory agencies, Dufferin County, municipalities, local residents, and Aboriginal communities will be notified through mailings, the project website, and newsprint of project activities and changes to procedures. This could include start of construction, construction and operational updates, maintenance activities that affect the local community, changes in regulatory procedures, and general information that is of public interest. When finalized in collaboration with Dufferin County and local municipalities, the project communications plan will address the following areas in greater detail:

- How the public and other organizations will be provided with information about the project
- A plan for receiving communications from the public
- A procedure for recording any complaints from the public.



9.3 Emergency Response

9.3.1 Chemical Handling and Spills

Spills Response Plan

Various lubricants, oils and fuels will be required during the operations period. Although unlikely, any leakage of oils from the turbines would be captured within the containment system. Legislation of relevance to spills management and response include:

- *Environmental Protection Act*
- *Fisheries Act*
- *Gasoline Handling Act*
- *Ontario Pesticides Act*
- *Ontario Water Resources Act*
- *Transportation of Dangerous Goods Act.*

Federal and Provincial legislation place the responsibility for spill prevention and mitigation on the owner or controller of products or materials that can be spilled. Spills are defined under these Acts, as, but not limited to:

- Spills from containers including drums and tanks
- Spills resulting from breaks in hydraulic or transfer hoses or piping
- Spills resulting from traffic accidents and fire fighting.

In accordance with these Acts, DWP has an obligation to:

- Prevent, eliminate or remediate an adverse affect resulting from a spill
- Report the spill to the Ontario MOE (Spills Action Centre- Tel: 1-800-268-6060).

The County and local municipalities will be notified in the event of any accidental spills.

DWP and its contractors shall reduce the likelihood of spills by implementing effective spill prevention measures such as the careful handling and proper storage of the products in use. In the event of a spill, the procedures detailed below shall be followed to facilitate a quick response.



Spills Response Measures

- The individual who discovers a leak or spill shall immediately attempt to stop and contain the release if it can be done in a safe manner
- Any spill or leak shall be reported immediately to DWP
- DWP shall immediately report the release to the MOE Spills Action Centre (1-800-268-6060)
- DWP will have the authority to take appropriate action without unnecessary delay
- DWP shall assume the overall responsibility of coordinating a cleanup and maintaining this contingency plan current and up-to-date. DWP shall, in consultation with regulatory authorities:
 - Deploy on-site personnel to contain the spilled material using a dyke, pit, absorbent material or booms, as appropriate
 - Assess site conditions and environmental impact of various clean up procedures
 - Choose and implement appropriate clean up procedure
 - Deploy on-site personnel to mobilize pumps and empty drums (or other appropriate storage) to the spill site
 - Apply absorbents as necessary
 - Dispose of contaminate debris, cleaning materials, and absorbents by placing in an approved disposal site
 - Take all necessary precautions to ensure that the incident does not reoccur.
- DWP shall submit a written report to appropriate regulatory authorities as required by applicable legislation
- In order to respond to accidental releases, the following resources shall be made available on-site in an appropriate location to allow for immediate use:
 - Absorbent material (i.e., sorbent pads, Sorb-All, vermiculite)
 - Protective equipment, shovels, rakes, tool kit, buckets and drums, stakes and tarpaulins.

To ensure proper storage and disposal of waste, and to prevent contamination, DWP will be required to remove all waste materials during maintenance activities. There will be a systematic collection and separation of waste materials within on-site storage areas in weather protected areas located at the O&M building.

To prevent accidental spills, liquid wastes will be labeled and stored in secure areas of the O&M building to ensure containment in the event of a spill. Refueling and equipment maintenance would occur in designated areas. Spill kits will be provided on-site during maintenance activities and as per Section 13 of the *Environmental Protection Act*, all spills with potentially adverse environmental effects will be reported to the MOE's Spills Action Centre.

The septic tank design for the O&M building will conform to local building code requirements.



Storage of Petroleum, Oil, Lubricant and Chemical Handling

All necessary precautions to prevent and minimize the spillage, misplacement or loss of fuels and other hazardous materials shall be taken. All Acts and Regulations pertaining to special substances shall be followed.

The delivery, storage, use and disposal of these hazardous materials will be handled only by trained personnel in accordance with government laws and Regulations. The following precautions will be taken in handling petroleum, oils, lubricants (POLs) and chemicals:

- The transport of fuel will be conducted in compliance with the *Transportation of Dangerous Goods Act*
- Mobile fuelling trucks will be used to minimize the requirements for onsite storage of POLs
- Diesel fuel and gasoline may be stored on site in limited quantities. Drums as required for one day's use will be on site, and drums will be delivered on a daily basis. Fuel drums will be stored upright on a deck with drip trays for the collection of spilled substances
- Where possible, vehicle maintenance will be performed off site, at a nearby commercial fuelling station, in order to minimize the amount of lubricants and oils stored on site; On-site POL storage will be in a ventilated, lockable steel container. The container will be equipped with galvanized steel drip trays for the collection of spilled substances
- The on-site POL storage container shall be located on level terrain, at least 100 m from any water body or wetland
- Spill decks will be used for transferring products to smaller containers
- No POL storage will occur in sensitive areas (e.g., near wetlands, watercourses or wells)
- Fire extinguishers and a spill kits will be located near POL storage areas
- POL storage areas will be identified by signs, and "No Smoking" signs will be displayed at all POL storage sites and refueling areas
- Smoking will not be permitted within 50 metres of any POL storage area. On-site signage will indicate the location of smoking areas.



POL and Chemical Handling Measures

- Equipment used will be mechanically sound with no oil or gas leaks. The Contractor shall undertake frequent inspection of equipment and repair leaks immediately
- Fuelling, storage and servicing of vehicles and construction equipment is not allowed within 30 metres of a watercourse, drainage ditch, areas with a high water table, or exposed and shallow bedrock
- Spill clean-up materials shall be accessible and maintained in the areas of fuel and chemical storage. Any spilled fuel or lubricants shall be promptly cleaned up and disposed of in accordance with Ontario MOE requirements (MOE Spills Action Centre - 1-800-268-6060)
- No equipment shall be washed within 30 metres of a watercourse
- All tanks shall be protected from collision damage by the use of snow fencing to alert operators, or by the placement of barriers to impede equipment movement near the tank
- Handling and fuelling practices shall ensure that contamination of groundwater will not occur
- Fuel storage areas and transfer lines shall be clearly marked or barricaded to prevent damage from vehicles
- If drums are stored on their sides, the drums shall be stored so that the bungs are in the 9" and 3" position, on level ground and prevented from rolling
- Drum storage areas shall be marked or fenced with temporary fence to avoid impacts
- Day-use quantities can be stored upright or on the side as required. Drip pans lined with absorbent pads shall be used beneath taps
- All stained soil resulting from the use of chemicals or fuels shall be cleaned-up and disposed of prior to leaving the work area
- Waste oils and lubricants will be retained in a closed container, and disposed of in an environmentally acceptable manner.

Equipment Fuelling

Only equipment that is not easily transported will be refueled on site. All other vehicles and equipment will be refueled at a central fuelling station:

When refueling equipment, operators will:

- Use designated fuelling locations where practical
- Use drips trays
- Use leak free containers and reinforced rip and puncture proof hoses and nozzles
- Be in attendance for the duration of the procedure
- Seal all storage container outlets except the outlet currently in use.



Fuelling must be done at least 30 metres from a wetland or water body. The Construction Manager will make daily inspections of hydraulic and fuel systems on machinery and leaks will be repaired immediately. All spills will be reported to the MOE Spills Action Centre (1-800-268-6060). Servicing of equipment will not be allowed within 100 metres of a wetland, watercourse or drainage ditch. Fueling attendants will be trained in the requirements under the Fuel and Hazardous Material Spills Contingency Plan in the Environmental Effects Monitoring Plan.

The MOE's Spills Action Centre will be notified of all spills with potentially adverse environmental effects. Soil and groundwater will be assessed and remediated as required, and a monitoring plan would be implemented.

9.4 Non-Emergency Communications

DWP representative contact information will be available to the public to address concerns and questions during the life of the project including construction, operation, and decommissioning.

DWP will continue its stakeholder engagement activities through operations phases. This could include some of the communications activities planned for the construction period.

Broad community relations activities are also seen as essential to the implementation of a successful project. To this end, the following activities will be undertaken:

- Offers to conduct on-site tours with community leaders, local media and other interested parties during construction and periodically during operations
- Erect signs
- Establish a project reporting mechanism for status reports with key regulatory stakeholders.

DWP will engage and inform the public, identified Aboriginal communities, Local Services Boards, the Townships, the County of Dufferin, and related Provincial Ministries (i.e., Ministry of the Environment) in the following manner:

- Non-emergency communications related to the project will be dealt with via update bulletins posted at the project office, project website and distributed to the local Aboriginal communities' offices as well as to the Municipal Town Office and relevant stakeholders. This could, for example, include notification of project changes or results of the ongoing project monitoring.



- Throughout the life of the project, DWP will maintain detailed “issues identification and resolution tracking tables.” The issues/resolution tables will record key information such as name, address and the telephone number of the complainant; time and date of the complaint, details of the complaint; actions taken to remediate the cause of the complaint; and proposed actions to be taken to prevent reoccurrence in the future. This document would be available in a log book electronic file.

A local project office is currently being established. In the interim, all correspondence regarding the project will be directed to the main project contact as follows:

Full Name of Company:	Dufferin Wind Power Inc.
Address:	TD Canada Trust Tower 161 Bay Street, Suite 4550 Toronto, ON M5J 2S1
Telephone:	Office: 416-551-6375
Website:	http://www.dufferinwindpower.ca
Prime Contact:	Jeff Hammond, Senior Vice President
Email:	info@dufferinwindpower.ca

All correspondence and concerns raised will be recorded in a form of a log book in an electronic file including: detailed information (name, address and telephone number of the complainant), response to concerns and methods addressing the concerns. The procedure for recording any complaints from the public would also include notifying the Ministry's Spills Action Centre at 1-800-268-6060 of the receipt of the complaint.

9.5 Complaints Resolution Process

DWP acknowledges that some members of the community may have negative reactions to some of the construction activities and long-term wind farm operations. Both the complainants and DWP have a stake in collaborating to resolve issues. A solution, in which both parties have had input, is more likely to constitute a long-term solution and is one that can often be implemented more effectively and efficiently than a decision rendered through an adjudicative process. To resolve disputes in a collaborative manner DWP will establish a Complaint Resolution Process (CRP). The Construction or Operations Manager will be responsible for the implementation of the CRP, including the documentation of all complaints and inquiries from the public in relation to Project construction and operations. The Construction or Operations Manager will attempt to initially respond to complaints within a one or two day period following receipt.



At a minimum, the CRP shall include provisions for the following:

1. Direct communications between the complainant and the receiver of the complaint (if not DWP) and DWP as the project proponent.
2. Fact-finding concerning the complaint, including:
 - a) the area affected by the construction or operation activity, the area's zoning and its occupation, and the proximity of the affected persons as well as their sensitivities
 - b) the characteristics and magnitude of the effect
 - c) the impact on the persons affected
 - d) any existing goals or standards acceptability
 - e) the history of operations in the affected area
 - f) any changes in existing conditions (e.g., changes to land use)
 - g) the availability of additional mitigation measures
 - h) a balance between the needs of the community and those of DWP
 - i) technically, operationally, and economically feasible solutions
 - j) regulatory precedents regarding the effect
 - k) other issues specific to the complaint.
3. All parties would have the ability propose constructive and feasible solutions and should be receptive to the solutions proposed by the other party.
4. Should the parties be unsuccessful in their attempts to resolve an issue through collaborative measures, they may, on agreement, request the services of a mediator.

The Township of Melancthon will be provided with a copy of all correspondence arising from the Complaints Resolution Process, including confirmation of the outcome of the process.