

August 26, 2022

Compliance Promotion and Enforcement Unit
Impact Assessment Agency of Canada
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**Subject: SPRINGBANK OFF-STREAM RESERVOIR PROJECT – IAAC CONDITION 11.5.4:
NOTIFICAION OF SPILL**

As required by Condition 11.5.4 of the Decision Statement, Alberta Transportation is submitting a written report for the spill that took place on May 26, 2022, initial notification was sent to IAAC on May 30, 2022, and under IAAC condition 11.5.3 a 30-day spill report was issued on June 24, 2022. The report contains details that fulfills IAAC condition 11.5.4:

11.5.4 submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of the changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 11.5.3. The report shall include all additional views from Indigenous groups and potentially affected parties and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 11.5.3.3 were received by the Proponent.

Please contact me if you have any questions regarding this notification.

Sincerely,



Mark Svenson, P.Biol
Water Management Environmental Specialist
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Attachment 1: 90-day Post Spill Report

Description of Changes Made to Avoid a Similar Accident

As described in the 30-day post spill report, it was determined that stockpile shape and an inexperienced operator were the root causes that led to the tipping of the scrapper and release of fluids. A mass safety meeting was held on June 2, 2022 where the circumstances of the incident and the corrective/preventive measures were presented to labour and staff. The following has been committed to:

- Informing new hires on how to communicate and what to document in the event of a spill
- potential hazards and risks, and measures to reduce both are discussed at the onset of each day
- on the job training/buddy system is in place for junior equipment operators
- heavy equipment operators are experienced, and
- stockpiles are inspected frequently and, if required, reshaped to eliminate the potential of a similar incident.

There are no expect residual environmental effects as a result of this spill; Alberta Transportation is confident that all contaminated soils have been removed. Additional mitigation measures are not required at this time. The area is still within active construction and reclamation will be completed at the end construction. At the end of construction, the area in question will be reclaimed and monitoring will be completed as described in the Vegetation and Wetland Mitigation, Monitoring and Revegetation Plan.

Indigenous Engagement

Indigenous groups were issued a letter on June 21, 2022 informing that a spill took place on May 26, 2022 at the Project site. Details of the event were provided in the letter; however, no feedback has been received to date.

Regulatory Requirements

To date, Alberta Transportation has not received any feedback or inquiries from Alberta Environment and Parks (AEP) regarding the spill.

Accident and Malfunction Plan Compliance

Since sending the 30-day post spill report to IAAC, Alberta Transportation has reviewed the Environment Construction Spill Response Plan: Construction Spill Response and Communication Plan (the Plan; submitted to IAAC on April 14, 2022) to confirm if the spill response was in compliance with the Plan. Based on Table 2 of the Plan, the following steps were taken in response to the substance release:

1. **Be safe – Assess the risk**
2. **Call for Assistance**
3. **Stop the Flow**
4. **Contain the Spill**
5. **Report**
6. **Clean up**

There is one aspect of spill response that was not in compliance with the plan: communicating the spill to Alberta Transportation and self-reporting to AEP within 24 hours of the spill. Both were completed

over the 24-hour Plan requirement. Alberta Transportation and the Prime Contractor have discussed the reporting timeline as well as what constitute a reportable spill and the plan will be updated to reflect lessons learned from this substance release and the spill response.

The Environment Construction Spill Response Plan will be redistributed to IAAC and Indigenous groups for review once updated.