

WESTERN CANADIAN SPILL SERVICES LTD.
SPILLS OF UNKNOWN ORIGIN — GUIDELINE

WCSS ROLE

The Western Canadian Spill Services Ltd. (WCSS) will assist the lead regulatory agency in the containment and control of spills on a case-by-case basis (at the discretion of the Cooperative Chair, Alternate Chair or representative of the area cooperative (i.e.: Steering Committee member)).

In this document, “assisting the lead regulatory agency” is important in that it recognizes that although the WCSS is not legally obligated to respond to these types of spills, the organization is prepared to help when it is appropriate. It also emphasizes that the role of the WCSS is to assist with the spill response under the direction of the lead regulatory agency.

Containment and control of spills of unknown origin for the purpose of this document refers to the following:

- develop a safe incident approach plan with safety as the highest priority;
- sampling and analysis of the spill material to identify the substance;
- develop a containment plan and take steps to prevent the spilled material from migrating from the site;
- collection and appropriate disposal of free fluids from the site;
- removal and disposal of contaminated material at an approved waste facility if in-situ treatment is not an option.

SPILL REPORTING / INITIAL RESPONSE

In the event that the spill is discovered by a WCSS member company, the member company representative will:

- report the spill to their spill cooperative contact;
- if safe to do so, secure the site and under advice from the cooperative and lead regulatory agency, representatives prevent the spill from migrating off the site;
- make note of any evidence at the spill site that will assist the government inspector in identifying the responsible party.

Spill Preparedness and Response since 1972.

Following the report of a spill of unknown origin, the cooperative representative will:

- report the spill to the appropriate regulatory agency and request a site visit and direction in terms of what the agency's expectations are (agreements should be followed up in writing);
- document the key points of the incident (utilize forms in section 2 and 8 of WCSS Generic Manual or equivalent);
- dispatch a cooperative representative to the site with appropriate contractors to initiate containment and control activities;
- notify the WCSS President & COO (A. McFadyen at (403) 516-8017) or the WCSS Equipment Manager at (780) 955-6008.

Note: When possible, no work should be done at the site without direction from the lead regulatory agency.

SAMPLING AND ANALYSIS

If appropriate (inspector request), samples may be gathered at the spill site and forwarded to a commercial laboratory for analysis. The objective of the analysis should be to identify the material so that a safe, effective response can be undertaken. The analysis could also be used to fingerprint the source of the spill. When possible, the inspector should assist with the sampling process.

USE OF CONTRACTORS

A cooperative representative should work closely with the government inspector to determine the spill response plan. If contractors are utilized to contain and control the spill, they should be under the direction of the cooperative representative.

The cooperative would advise the WCSS Managing Director or their Executive Sub-Committee representative if the spill of unknown origin:

- creates public interest
- is non-routine
- has high costs associated with the response.

DISPOSAL OF OIL DEBRIS / CONTAMINATED MATERIAL

The preferred response option is to treat the material on site and if free fluids are removed, transport them to an approved waste facility.

For small spills where the contaminated material must be removed, the cooperative, in consultation with the inspector, has the authority to utilize an approved waste facility. If the disposal costs exceeds \$5,000.00, the co-op must notify the WCSS Managing Director or their Executive Sub-Committee member.

PAYMENT FOR SPILL RESPONSE ACTIVITIES

All invoices related to the spill response should be attached to a spill report form that includes the following information:

- date the spill was discovered (reported)
- location of spill
- government agency / inspector name / contact number
- brief outline of the request
- material spilled
- spill response outline
- breakdown of costs

The invoices and spill report can be forwarded for payment to:

Western Canadian Spill Services Ltd.
Box 503, 3545 - 32 Avenue NE
Calgary, AB T1Y 6M6
Attention: Alan B. McFadyen