



FOOTHILLS
FOREST PRODUCTS

SPILL RESPONSE PLAN

2026 - 2027



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All individuals working for Foothills Forest Products Ltd (this includes employees and contractors) must know Foothills Spill Response Plan and be able to properly respond to a spill.

Treat spill response with the same care as you would a fire. You must ensure all personnel and/or equipment required to carry out the action plan are made available immediately and will remain on-site until clean-up is complete and/or until relieved by a Foothills employee. It is the responsibility of the Contractor to clean up any spill they are responsible for.

ACTION IN THE CASE OF A SPILL

1. Ensure safety of yourself and co-workers first.
2. Prevent fire. Enforce no smoking, shut off motors and electrical circuits, etc.
3. Warn people in the immediate area and request their help if required.
4. Stop the source of the spill, if possible and safe to do so.
5. Contain the spill and prevent entry into ditches or waterbodies such as creeks, wetlands, lakes, etc. (see CONTAINMENT section for information on how to do this). If in the water already, use absorbent booms to enclose area around spill.
6. Notify Foothills Key Personnel if one or more of the following are present: (see REPORTABLE SPILL LEVEL table for greater detail)
 - The amount spilled is legally reportable: 100 litres of gas, diesel, or oil or 5 litres of antifreeze.
 - The spilled material has entered a water body.
 - Foothills assistance is required.
 - The amount or type of substance spilled is unknown.
7. The contacted Foothills key personnel is to:
 - Notify Graham Duckers immediately and
 - Notify Alberta Environment 1800-222-6514
8. Obtain required assistance from:
 - Petro-Canada: 403-296-3000 (24hour emergency)
 - Public Land, Provincial Parks, Protected Area: 780-310-5263
 - Environmental and Dangerous Goods: 780-272-9600

10. Use spill kit material to absorb as much of the spill as possible. Additional spill mop-up kits of absorbent materials and containment devices are available at the Foothills forestry shed.
11. Investigate cause of spill and complete a SPILL REPORT form.

Response to public and media calls will be made by Foothills Forest Products Ltd. designated personnel only

FOOTHILLS FOREST PRODUCTS CONTACT LIST		
Coordinator	Office Phone	Mobile Phone
Graham Duckers	780-827-2225 ext 112	780-827-8348
Trent Johnson	780-827-2225 ext 109	780-227-5056
Skyler Lewis	780-827-2225 ext 108	780-827-6700
Brenden Elgert	780-827-2225 ext 114	587-938-2983

CONTAINMENT

Minimize the Effect

Product that is not immediately contained on land can flow into adjoining water courses and be transported considerable distances from the spill site making containment and mop-up difficult, expensive and perhaps impossible. Every effort must be made to divert spills away from possible pathways that would enable the product to spread over a larger area.

Build an Earth Dam

A simple earth dam may be sufficient to contain and restrict the flow of product spill when the surrounding ground or surface area is impermeable. If the soil is permeable, it will be necessary to dig a hole/trench that could be lined with a plastic tarp, or other impervious material.

Build a Wooden Dam

A wooden plank placed across a ditch or small stream and embedded on both banks can be used to hold back product flow. Provision can be made for water to underflow the barrier by leaving an open space under the plank.

Build a Straw/Hay Wire Mesh Barrier

If straw or hay and wire mesh are available, a floating barrier, held in place by a wire cable or rope, can be constructed.

Use Logs

Logs can be used as a means of restricting the spill flow. If more than one log is required, the joining points must be secured in such a manner that will not allow a flow through of product. This can be done using plastic, overlapping the logs, or using a double row of logs and offsetting the ends.

Use a Combination of Wood and Absorbent Barriers

Similar to a wooden dam design, it also uses materials to absorb the product spill.

The following dimensions can be applied to either berm or catch-basin construction. Where possible the berm must be constructed of impervious soils and the top must be 3 feet wide:

CAPACITY	DIMENSIONS
500 gallon	6' x 8' (internal) x 3' (top)
1000 gallon	8' x 15' (internal) x 3' (top)
2000 gallon	10' x 15' (internal) x 3' (top)
3000 gallon	10' x 22' (internal) x 3' (top)
4000 gallon	12' x 22' (internal) x 3' (top)



5000 gallon

15' x 25' (internal) x 3'(top)

REPORTABLE SPILL LEVELS

TYPE	CLASS	AMOUNT
Explosives and detonators	1.0	Any
Flammable gases, other than natural gas (i.e. propane, acetylene)	2.1	10kg
Non-flammable gas (i.e nitrogen, carbon dioxide, argon)	2.2	10kg
Flammable liquids (i.e. gasoline, diesel solvents, naphtha, "Jet B")	3.0	100L
Oxidizing substances (i.e. hydrogen peroxide, oxygen)	5.1	50kg or 50L
Toxic substances (i.e. anti-freeze)	6.1	5kg or 5L
Corrosive substance (i.e. battery acid)	8.0	5kg or 5L
Waste oil and any petroleum products (i.e. hydraulic oil, gear oil, transmission fluid)		100L
Waste containing a pest control product		5kg or 5L

GENERAL MEASURES

Fuel spills are often the result of improper or careless operation of fueling equipment and the lack of preventative maintenance of the fueling equipment. Self-discipline on the part of everyone responsible for fueling is required to prevent fuel spillage. It is better to prevent a spill in the first place than to have to deal with it once it has occurred.

The following measures must be used to reduce the risk and environmental impact of gasoline, oil and diesel when they are handled, transported and stored. These include legal requirements as well as best practices. In case of a contradiction between best practices and any legal requirements, the legal requirements take precedence, and you must inform a Foothills Supervisor.

- All individuals handling, transporting or storing fuel must be trained in Foothills Spill Response Plan.
- If a fuel spill occurs, initiate the ACTION IN THE CASE OF A SPILL procedure.

- Proper containers must be used:
 - Containers with a capacity of 20L or more for gasoline must be UN certified (will have a UN decal) and these must be pressure tested at least every 5 years.
 - Containers with a capacity less than 454L for oil and diesel must meet the intent of TDG (all Tidy Tank Ltd. tanks in good repair meet this standard).
 - Containers with a capacity greater than 454L used for oil or diesel must be UN or ULC certified, and pressure tested every 5 years.
 - All tanks greater than 20L must be labelled with a flammable/combustible sticker or placard as well as WHMIS, so that it is visible from the outside of the truck. If the contents are to be used within the day, WHMIS labelling not required.
 - Only dispensing pumps designed for gasoline or diesel are to be used.
 - Check with supply agent for container requirements of all other substances.
- All leaks on logging equipment and fuel tanks must be repaired promptly and clean-up of the site is to be undertaken right away.
- All fuel tanks and fuel trucks must be located in a level and stable position, at least 50 meters from any water course (i.e., creek, swamp, lake, etc.) and away from regular traffic.
- A Risk Assessment is suggested for all sites but is only required for fixed location tanks.
- If Risk Rank is high (see RISK ASSESSMENT form), additional control measures are required, such as moving the fuel site, which must be documented. If the risk can't be reduced, contact Foothills.
- When considering a temporary storage location for all vehicles with tidy tanks or tank vehicles, the site should be easily visible and away from congested traffic.
- Dispensing of fuels must be continuously supervised: never leave a nozzle unattended and frequently check the amount of fuel to prevent over filling.
- Never tie or wedge the nozzle trigger in an open position (automatic shut-off nozzles with a break-away coupling must be used when using an integral hold-open device).
- Tanks, pumps, caps, hoses and nozzles used for dispensing fuel must be maintained in good repair. Visually check all such equipment every day.
- All nozzles must be secured when not in use and have drip containment.
- Fuel hose length cannot exceed 4.5m.
- All valves must be closed and locked during moving and when the site is left unattended.
- Containers must not be filled beyond their safe filling level (90% of capacity).

- All tanks must be secured in a safe manner and so that the contents will not spill.
- Regular inspections must be conducted and documented to ensure that all refueling equipment meets all safety and environmental requirements. At a minimum, each contractor must inspect their facilities each season using the FUEL MANAGEMENT INSPECTION REPORT and provide a copy to Foothills.
- All vehicles used to transport fuel and all fuel cache locations must have a copy of the Spill Response plan and a spill response kit (as per the FUEL MANAGEMENT INSPECTION REPORT).
- All vehicles transporting fuel tanks must be legal to drive on public roads.
- Keep current MSDS in a location known and available to all workers.
- Spill response training is recommended for anyone transporting or dispensing fuel.
- All contaminated soil and water, cleaning products, and used oil and filters must be stored in a suitable container and lawfully disposed of after consultation with the appropriate Provincial Agency.
- All garbage and empty containers must be removed each day from the tank site and appropriately disposed with.

Additional Measures for Mobile Tanks with a Capacity >454L

- Signs must be installed that give refueling instructions, indicate that smoking is not allowed, and the ignition must be turned off.
- Safety measures must be taken against static electricity.
- Must be physically protected against collision.

Additional Measures for Fixed Location Tanks with a Capacity >230L

- Signs must be installed that give refueling instructions, indicate that smoking is not allowed, and the ignition must be turned off.
- Must have spill control (double walled tank, tank-in-a-box system, sloped site that prevents spills from entering all waterbodies and a barrier capable of containing a spill) or secondary containment (no water is allowed to accumulate).
- All fixed location tanks must be installed on firm foundations and mounted on a skid or positioned in a cradle.
- If more than 2000 litres is being transported, must have a valid certificate in TDG.
- A Risk Assessment must be completed for all fixed tank locations as well as when there is a significant change in any of the potential risks.

In addition to the above best practices, each contractor must perform a spill drill at least once a year. These drills must be documented on the SPILL DRILL EVALUATION FORM and a copy given to Foothills.

FIRE EXTINGUISHER REQUIREMENTS

All mobile fuel tanks < 454L	One (1) 20 B:C rated or, Two (2) 10 B:C rated fire extinguisher
All mobile tanks > 454L	One (1) 80 B:C rated or,
All fixed location tanks	Two (2) 40 B:C rated fire extinguisher

All mobile fuel tanks less than 454L are required to have at least one 20 B:C rated or two 10 B:C rated fire extinguishers. All mobile tanks greater than 454L and all fixed location tanks are to have at least one 80B:C or two 40 B:C rated fire extinguishers. All extinguishers must be portable and within 9m of the fuel tank.

FIRE EXTINGUISHER DEFINITIONS

1A FIRE EXTINGUISHER

1 = 1 ¼ gallons of water (2 = 2 1/2, 3 = 3 ¾)

A = Ordinary combustibles

10 B:C FIRE EXTINGUISHER

10 = Cover to ten (10) square feet

B = Flammable liquids

C = Electrical equipment



FUEL MANAGEMENT INSPECTION REPORT

	Yes	No	N/A	Comments
All vehicles with tidy tank have a "Truck Spill Kit" with at least one (1) 20 B:C or two (2) 10 B:C fire extinguisher				
All large engines have a "Truck Spill Kit" with all items required				
All large fuel tank (> 1,000 litres) have 45-gallon drum "Spill Response Kit" with all items required				
All refueling equipment meets all safety and environmental requirements				

ITEMS REQUIRED FOR 'TRUCK SPILL KIT'

ITEM	#
Oil sorbent sheets (white)	10
Antifreeze pads (grey)	10
Socks (4' long, 3" wide)	3
Plug pattie (instant stop leak)	1
Disposal bag	3
Rubber gloves (pair)	1
Splash goggles	1
Spill Response Plan	1
Commercial bio-remediation product	1

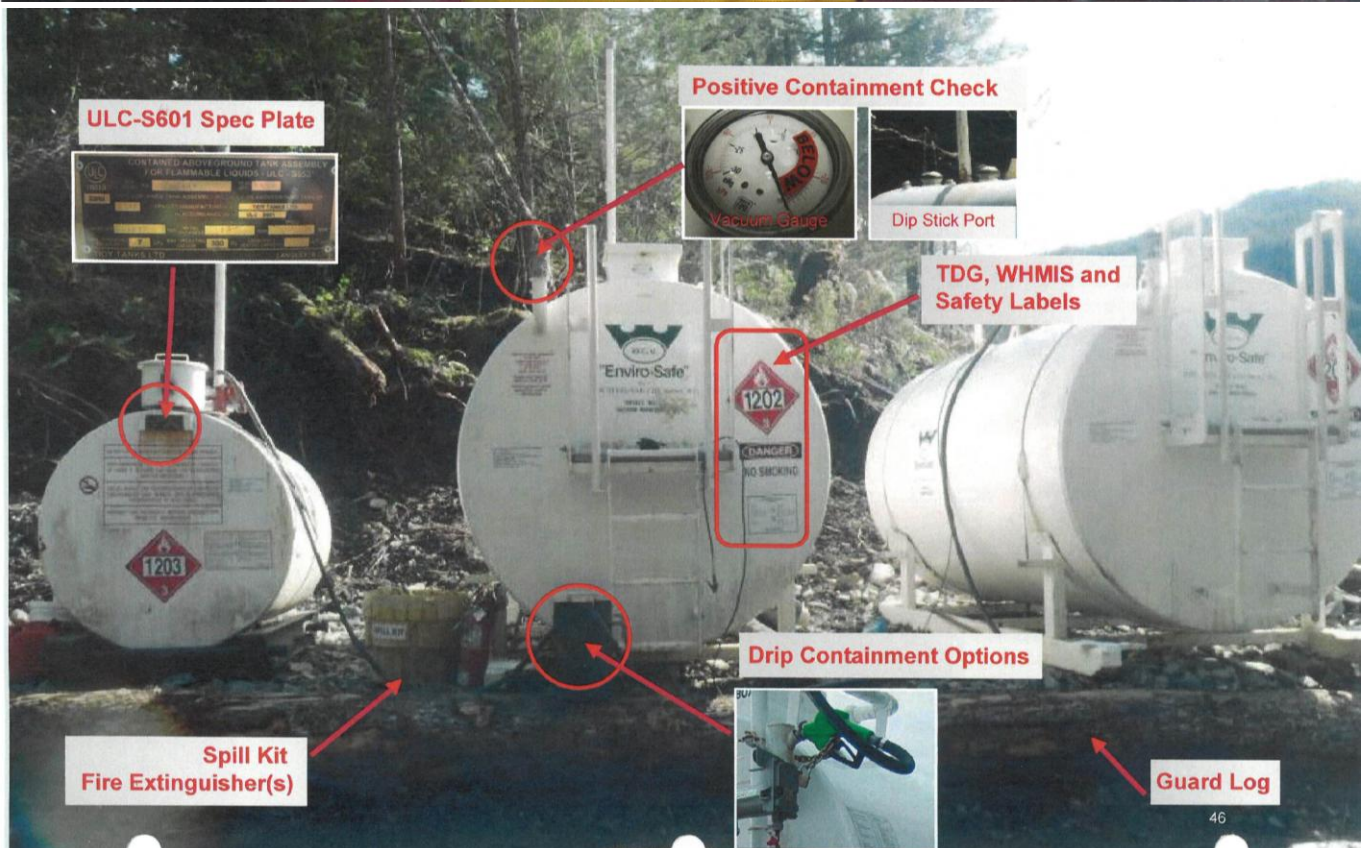
ITEMS REQUIRED FOR 45 GALLON DRUM 'SPILL RESPONSE KIT'

ITEM	#
10' boom	2
Oil sorbent sheets (white)	20
Antifreeze pads (grey)	20
Socks (4' long, 3" wide)	6
25lb bag qualisorb	1
Plug pattie (instant stop leak)	1
Disposable bag	5
Splash goggles	1
Nitrile gloves (pair)	1
Poly coated Tyvek suit	1
Disposable respirator	1
Spill Response Plan	1

COMMENTS

DATE	YY	MM	DD	CONTRACTOR SIGNATURE

FORM MUST BE FILLED OUT BY EACH CONTRACTOR ONCE PER SEASON (WHEN OPERATIONS ARE BEING CONDUCTED) AND SUBMITTED TO YOUR FOOTHILLS SUPERVISOR)





FUEL FACILITY RISK ASSESSMENT

The objective of the risk assessment is to help operators understand the level of risk they are taking in managing their fuel facility for the purpose of taking appropriate risk-control measures.

LOCATION	DATE YY MM DD
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This section provides a simple risk ranking approach:

- Assign a risk-rank value (3 for high, 2 for medium, and 1 for low) for each of the risk identification categories indicated in the column on the left in Table 1
- Add these values to arrive at the total risk-ranking value for the fuel storage facility.

RISK-RANKING FOR LAND-BASED FUEL FACILITIES


RISK IDENTIFICATION	RISK RANK HIGH (3)	RISK RANK MEDIUM (2)	RISK RANK LOW (1)	ASSIGNED RISK RANK VALUE
Distance to nearest watercourse	<50m	50m-100m	>100m	
Characteristic of soil at the fuel facility	Porous or unknown	Semi-porous	Non-porous clay/bedrock	
Slope of terrain surrounding the fuel facility	>6%	2-6%	<2%	
Site designation or description	High traffic (mainline)	Low traffic (side spur)	No through traffic	
Duration of fuel facility operations	>6 days	2-6 days	<2 days	
Volume of fuel stored at the fuel facility	>4500L	500-4500L	<500L	
Number of times the fuel facility is used per day	>12	6-12	<6	
Amount of traffic around the fuel facility	>15 persons on-site	5-15 persons on-site	<5 persons on-site	
Distance to additional spill response cache	>60 min	15-60 min	<15 min	
Additional spill control	Tank with no secondary containment	Tank with secondary containment	Tank with secondary containment & additional spill control – graded site	
Last spill response training for everyone handling fuel	Operator not trained in >2 yrs	Operator not trained in 1-2 yrs	Operator trained in the last year	


Total Risk-Rank Value (total of the assigned risk-rank value)

Use the total risk-rank value determined in the table above and compare it to the table below to determine appropriate levels of effort to mitigate the risks at the fuel handling facility.

RECOMMENDATIONS ON RISK CONTROL MEASURES

NUMERICAL VALUE	RISK RANKING	RECOMMENDATIONS ON RISK CONTROL MEASURES
<12	Low Risk	No additional control measures are necessary
12-23	Medium Risk	a) Additional control measures should be considered to reduce risk. b) Document inspections.
>23	High Risk	a) Additional controls are necessary to reduce risk b) Consider moving the fuel facility c) Document inspections.

				<h2>SPILL DRILL EVALUATION FORM</h2>				
CONDUCTED BY			DATE	YY	MM	DD	CONTRACTOR	
GEOGRAPHIC LOCATION			CREW PRESENT					
SCENARIO								
							YES	NO
REQUIRED EQUIPMENT ON SITE							<input type="checkbox"/>	<input type="checkbox"/>
CREW WAS ABLE TO USE EQUIPMENT							<input type="checkbox"/>	<input type="checkbox"/>
RESPONSE ACTION FOLLOWED PROCEDURE							<input type="checkbox"/>	<input type="checkbox"/>
CREW KNEW HOW TO ACCESS ADDITIONAL RESOURCES							<input type="checkbox"/>	<input type="checkbox"/>
OPPORTUNITY FOR IMPROVEMENT AND REQUIRED FOLLOW UP								

		<h2>SPILL REPORT</h2>	
REPORTED BY		DATE YY MM DD	TIME OF DISCOVERY
FOOTHILLS PERSONNEL CONTACTED		GEOGRAPHIC LOCATION	
ESTIMATED AMOUNT OF SPILL		TYPE OF MATERIALS SPILLED <input type="checkbox"/> OIL <input type="checkbox"/> ANTIFREEZE <input type="checkbox"/> CONCENTRATE <input type="checkbox"/> MIX <input type="checkbox"/> OTHER	
DID SPILL REACH WATER COURSE? <input type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, TYPE OF WATERCOURSE	
IS CLEAN UP COMPLETE? <input type="checkbox"/> YES <input type="checkbox"/> NO IF NO, WHY?		CONTACTED AGENCIES <input type="checkbox"/> PEP <input type="checkbox"/> PETRO-CANADA <input type="checkbox"/> OTHER	
ACTIONS TAKEN TO STOP, CONTAIN AND CLEAN-UP SPILL			
DESCRIPTION OF DISPOSAL OF SPILLED PRODUCT AND ABSORBENT MATERIAL			
DESCRIPTION OF CIRCUMSTANCES & CAUSE OF THE SPILL			
WHAT CHANGES OF METHODS OR EQUIPMENT ARE NEEDED TO PREVENT REPETITION			
WHAT CHANGES IN CLEAN-UP METHODS OR EQUIPMENT TO AID IN FUTURE SPILLS SHOULD BE MADE			