Section 8.0
Contingency Planning

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CONTINGENCY PLANNING

The proposed OlyWest pork processing facility in the City of Winnipeg will have numerous contingency plans in place for fire, emergency response, accidental spills, and disruption of service to the City's sewer line.

This section of the report describes in detail some of the contingency plans that the proposed OlyWest facility has developed to ensure an appropriate response to unlikely, but potential mishaps.

8.1 MALFUNCTION OF PROCESS EQUIPMENT

Although not emergencies from a public viewpoint, pork processing facility upsets are generally caused by failure of equipment or of the power source. Typical stoppages from equipment breakdowns are usually about a half hour in duration, but can extend to more than one hour.

To reduce stoppages due to equipment failure, backup replacement parts will be kept on-site for commonly used equipment. In the event of a power source failure, the proposed OlyWest facility will be equipped with a backup generator for the purposes of protecting the integrity of the Information Technology (IT) systems. There will also be a backup generator located near the manure storage bin in the hog holding facility which will be used to power the ventilation system and the lighting within the hog holding facility to allow reloading of hogs into trucks in the case of extended power outages. As a prime electrical customer of Manitoba Hydro, it is anticipated that the proposed facility would be quickly serviced by Manitoba Hydro in the event of a power failure.

8.2 MALFUNCTION OF EMISSION CONTROL EQUIPMENT

In the event of a major malfunction of emission control equipment for the wastewater pre-treatment facility and for the protein recycling facility, the proposed OlyWest facility would have to stop operations. Maintenance agreements with equipment suppliers would include provisions for short turn-around time repairs to ensure that major malfunctions are quickly addressed.

In the event of minor malfunctions, the fact that the air treatment train includes a dual process will help to provide some mitigation if one piece of major equipment fails. Maintenance agreements with equipment suppliers would include provisions for short turn-around time repairs to ensure that such malfunctions are quickly addressed.

8.3 MALFUNCTION OF WASTEWATER PRE-TREATMENT SYSTEM

If a component in the wastewater pre-treatment system has a malfunction that results in poor wastewater quality, a turbidity meter located at the exit stream of the DAF system, will detect a change in quality of the effluent. If the turbidity meter value is too high, a valve located

down the pipe is switched, and all treated wastewater is diverted back into the equalization basin for another round of treatment. This diversion will occur until either the wastewater is treated to the point that it meets the turbidity meter criteria, or the equalization basin is full and facility operations must stop.

Alternatively, all process wastewater can be contained in the equalization basin while parts are replaced. Again, the process wastewater can only be held in the equalization basin until the basin is full, then the facility operations must be shut down. However, all pumps (wastewater feeding pumps, $Fe_2(SO_4)_3$ pumps, polymer pumps, caustic pumps, etc.) will be installed in duplicates to ensure continuous operation even with primary pump failure.

Significant wastewater pre-treatment malfunctions would be communicated to the City of Winnipeg at the time of the occurrence. If the wastewater can be adequately handled by the City of Winnipeg, the City may permit continued discharge of the less treated wastewater on a temporary basis depending upon quality and quantity. Such events would be addressed on a case by case basis with the City of Winnipeg.

8.4 FIRE

During construction and operation, the City of Winnipeg Fire Department should be the first to respond to any fire reported at the proposed site. To counteract small fires dry extinguisher systems will be provided on-site where necessary.

The proposed facility will contain sprinklers where necessary. Where necessary, as per National Fire Protection Agency codes, the building will be constructed accordingly (i.e. non-combustible construction) and as according to the combustible load within the area. Regarding the site, a fire loop containing hydrants will protect the building and a designated fire access route will be constructed around the building. The City of Winnipeg potable water supply will charge all of the wet fire protection systems on-site.

8.5 ACCIDENTAL SPILLS OR RELEASES OF DANGEROUS GOODS OR HAZARDOUS WASTES

During construction, spills or releases of wastes and dangerous goods will first be reported immediately to the Site Engineer. If the spill is estimated to be more than 68 L (19 US gal), the Site Engineer will inform Manitoba Conservation's Emergency Response Team (945-4888). After the response team has been notified, the Site Engineer will next inform Earth Tech (Canada), Inc.'s Environmental Services engineers to initiate and co-ordinate clean-up and monitoring of the spill. If the spill is less than 68 L, the Site Engineer will co-ordinate clean-up of the proposed site. A clay-based or synthetically lined fueling area will be installed to prevent spills from contaminating large areas and facilitate any clean-up. To prevent unnecessary emissions, heavy equipment will be well maintained.

In case of a liquid spill or release during operation of the proposed processing facility, the pre-treatment facility or the truck wash, the spill or release will be evaluated based on size and

type of release. If it is less than 68 L, the spill would be considered minor and would be cleaned up by properly trained facility personnel. Hazard communication program trained staff will be notified and organize site clean-up. If it is more than 68 L, then the spill would be classified as major and everyone will be cleared away from the area. The local supervisor and hazard communication program trained staff will organize clean-up. Following Manitoba regulations, all major spills will be reported to Manitoba Conservation's Emergency Response Team (945-4888). Manitoba Conservation's response team will have final authority on the clean-up.

In the event that a solid is spilled, the product will be collected using shovels and requisite safety equipment. If possible, the product will be reused. If the product is too contaminated and is classified as a waste, OlyWest will ensure that the product is disposed of properly.

In the event that employees must be evacuated from the building, an alarm will sound. All employees not involved with the OlyWest emergency response team, will evacuate to pre-determined mustering areas outside the building. In the event of an ammonia spill, the mustering areas will change in order to keep employees upwind of the exhaust.

8.6 TRANSPORTATION ACCIDENTS

During construction, road and highway closures may impact the construction schedule. However, there will be two access roads with which to enter the site. These access roads include one coming from Mazenod Road along the western edge of the site and either Ray Marius Road on the east side of the site or the private road (Elizabeth Road) option from the south of the site. Two entry points not only allows construction vehicles to have access to the site at all times, but also allows emergency vehicles multiple points of entry anytime.

On-site during operation, there will be two points of entry for general, supply and emergency vehicles. This ensures that if one entrance becomes blocked or damaged there will be a second entrance. These entrances are the same as those utilized during construction.

To minimize vehicle accidents on-site, employee parking will be kept separate from truck parking. Both types of vehicles will also have separate paths of travel while on-site to minimize their interactions and potential accidents. As well, there will be a shunt man who will be responsible for shunting reefer trucks, containing outgoing product around the site. Since the shunt man will be associated with the proposed facility, the road right of way will always go to the hog trucks, eliminating potential accidents caused over the right of way.

8.7 EXTREME RAINFALL EVENTS

During construction, the disturbed portion of the proposed site will be minimized to the extent possible and silt fences will be installed to minimize erosion from occurring with rainfall events. After construction is complete, seeding operations will occur to facilitate erosion control once the silt fences are removed.

During operation, the pre-treated wastewater, sanitary wastewater and the truck wash wastewater will exit the site in a sewer line. This sewer line will not be connected to land drainage sewers which will prevent the occurrence of CSO problems in high rainfall events.

8.8 FLOODWATERS TRANSPORTING POLLUTANTS

The proposed site does not lie within the flood plain as shown in Figure 2.11. As a result, no flooding across the proposed site is anticipated to occur except in the form of overland flooding due to spring thaw and exceedingly large rainstorm events.

To prevent floodwaters from transporting pollutants during construction, standard construction procedures will be undertaken. Any fuel spills will be cleaned up immediately, all heavy equipment will be well maintained to prevent any lines from leaking, all waste materials will be stored properly and dealt with in a timely fashion and there will be no dumping of wastes on-site.

To prevent flood impacts during operations, several features will be installed. The majority of all chemicals are stored inside the building in one of two chemical storage rooms. This prevents the chemicals from being affected by floodwater outside. A second inherent feature is that chemicals and other materials stored outside have a secondary containment around them, separating floodwaters from the inner tank. Fertilizers applied to the yard and the contents of the meal silos, if the silos are impaired, are the only items without secondary protection from floodwaters. However, as the land will be graded to flow into a retention pond, these materials will flow with the water and be contained in the retention pond.

8.9 DROUGHT

In cases of drought, OlyWest would be considered a primary consumer of water due to the holding of animals and being a food processing company, and therefore would not anticipate any significant interruption of water, and would rely on the City of Winnipeg to supply water to the facility as they have committed.

8.10 EXTENDED WASTEWATER PRE-TREATMENT DISRUPTION

If there is an extended wastewater pre-treatment disruption, the process wastewater can be held in the equalization basin until it is full. If the system is not repaired before the equalization basin is filled, operations at the proposed facility will be stopped or arrangements will be made with the City of Winnipeg to accept lesser treated wastewater. If the equalization basin is the component that has a malfunction, then facility operations will shut down until repairs can be completed.

8.11 EXTENDED PROTEIN RECYCLING FACILITY DISRUPTION

If the protein recycling facility has a disruption for an extended period of time during operation, materials will be collected and sent to an off-site rendering provider for processing.

8.12 UNPLANNED DISRUPTION OF CITY OF WINNIPEG SEWAGE LINE USE

During operation, if the City of Winnipeg sewer line use is disrupted for any period of time, facility operations will shut down. Although the process wastewater can be contained in the equalization basin until it is full, there are no on-site facilities to hold sanitary wastewater or truck wash wastewater.

8.13 ACCIDENT PREVENTION

Worker protection in Manitoba is provided through standards, procedures, and training legislated under the *Workplace Health and Safety Act*. All practices performed on the proposed site will be carried out in accordance with the *Workplace Health and Safety Act* to minimize health and safety impacts.

During construction, all workers are expected to follow and be trained in the safety protocols from their company. In the event of a severe accident, the Site Engineer will phone the Winnipeg Emergency Number (911) for an ambulance. The Contractor will be required to report all accidents to Workplace Health and Safety via the 24-hour Emergency Response Line (945-0581). Regular safety meetings will be encouraged throughout the construction phase.

During operation, the Plant Managers and Superintendents will be in charge of training all employees in safety and protocol and ensuring that they all have assigned tasks in the event of an accident. The Health and Safety Coordinator will be responsible for the ERP and arranging the necessary training for an emergency situation. A sample ERP from Olymel's Red Deer facility is included in Appendix G. In the event of an accident, fire, police and ambulance/hospital will be notified (911).

As an emergency prevention method, regular facility inspections will be completed by department foreman, safety committee members and the Health and Safety Coordinator. Safety equipment and personal protective equipment will either be supplied to the employees or be located throughout the facility, where needed.

Olymel's current processing facilities employ a Health and Safety Policy. A copy of the Health and Safety Policy for the Olymel Red Deer processing facility is included in Appendix M. OlyWest has committed to employ a similar Health and Safety Policy. In the Red Deer Health and Safety Policy, Olymel indicates that they will incorporate occupational health and safety management to the overall production process and strive towards zero tolerance of accidents and occupational injuries. It is Olymel's responsibility to establish and maintain the best possible standards of plant and equipment maintenance ensuring that physical and health hazards are eliminated. Olymel will ensure that every employee is trained in proper work procedures and personal protective equipment is provided.

Employees will be oriented on proper lifting techniques to prevent back injuries. To prevent repetitive strain injuries, Olymel encourages the completion of warm up exercises prior to work, provides rest breaks throughout shifts, encourages workers to report symptoms as soon as possible and will provide a modified work program until a doctor authorizes the affected employee to return to full duties.

8.14 MANURE AND BEDDING MATERIAL MANAGEMENT PROGRAM

Manure and bedding material from the trucks, screenings from the truck wash and manure from the holding facility will be collected in a receiving bin and will be disposed of on a regular basis. The preferred disposal option is through land application in accordance with prevailing regulations. If there is a problem with the land application program, an alternative disposal method is disposal at a landfill facility. The landfill chosen would operate with an environmental license, so disposal would follow environmentally sound practices. The second backup option involves a partnership between OlyWest and soil amendment companies, or industries of a similar nature.