



File: D03 – Windlectric

March 9, 2016

Algonquin Power Co.
354 Davis Road, Suite 100
Oakville, Ontario
L6J 2X1

Attn: Alex Tsopelas, Project Manager, Renewables

Dear Alex:

Re: Review of Emergency Response and Communication Plan

Thank you for providing the above-noted report for our review. Our consultant, AECOM, has prepared a response compiled from their observations as well as Loyalist Township staff comments on the report. We are pleased to attach these for your review and comment.

Please do not hesitate to contact the undersigned at 613-386-7351, ext. 117, should you have any questions.

Yours truly,

A handwritten signature in black ink, appearing to read "David MacPherson".

David MacPherson, C.E.T.
Public Works Manager
DM/ka

Encl.

March 9, 2016

Mr. David MacPherson C.E.T.
Manager of Public Works
Loyalist Township
263 Main Street, P.O. Box 70
Odessa, ON K0H 2H0

Dear Mr. MacPherson:

Project No: 60483242

**Regarding: Review of Emergency Response and Communication Plan
Amherst Island Wind Energy Project**

We have completed our review of the report entitled "Amherst Island Wind Project; Emergency Response and Communication Plan" prepared by Stantec and dated October, 2015. Our comments are as follows:

General Comments

This document has merit as a component of a safety plan that can be shared with workers and sub-contractors but it does not address safety issues and commitments made to residents of Amherst Island. This plan does not address maintenance of emergency routes, traffic concerns, traffic delays and impacts on ferry operations.

This document does not address Windlectric's commitment to implement a public communications plan.

Comments

1. Introduction

- a. List of things to be built appears to be detailed (both temporary and permanent).

2. Emergency Overview

- a. Note developed in consultation with Loyalist Township and County of Lennox & Addington.

3. Facility Monitoring

- a. Monitored by security when workers not on site.

4. Emergency Notification Procedure

- a. First contact is to be to the Construction Manager or Operation Manager – he calls 911
- b. Who is responsible to contact Province, County and Township reps within 4 hours?

- c. It is suggested that the plan identify that any excessive delays or delay resulting from a breakdown that blocks any roads must be relayed to the Emergency Services department immediately.

5. Emergency Preparedness

- a. Clarify training requirements for sub-consultants/ contractors. Will it be the same level as Algonquin employees?
- b. Emergency preparedness and fire extinguisher training are both mentioned, but vague around the amount of time this will take up.
- c. All personnel need to know the location of the turbine they are working at – should commit to temporary signage at work sites (i.e. turbine ID number)
- d. Unclear if fencing will be used for designated work areas as a preventative measure?
- e. Concerns about access to work areas don't seem to be mentioned.

6. Emergency Response

- a. Contractors, landowners, others are responsible for calling 911 and then notifying construction manager – contradicts Emergency Notification Procedure.
- b. First Aid/ CPR/ AED – The plan mentions First Aid Attendants, but it doesn't mention where First Aid kits/ AEDs will be located.
- c. Consideration of Road safety/ vehicle hazards could be identified with an emergency response protocol, along with preventative action (directing traffic, visibility, use of traffic cones for on road work, etc.).
- d. High Angle/Confined Space Rescue Protocol:
 - i. Second bullet states to bring injured person to ground level or a safe area; please identify who would be doing this. (e.g. – during construction – contractor responsible for this? During operation – service ground crew?).
 - ii. Last bullet states to call competent third party contractors as required – would this timeframe be a concern, due to access considerations to the island? Should those personnel working on the units be trained in both high angle and self rescue?
- e. Emergency Events and Response Protocols
 - i. The list includes “Breakdown / Collapse / Collision” – however this protocol is not discussed further like the others, please incorporate.
- f. Emergency Response Protocol – Fire/Explosion
 - i. Has the protocol considered fires in the turbine unit? Do the turbines have fire suppression systems built in? The recommendation from Emergency Services is that the operator be responsible for maintaining a foam bank with a type and quantity of foam to ensure a sufficient supply to deal with any flammable liquid emergency, both in the turbines as well as the storage/maintenance facility. Foam proportioning equipment would need to be obtained for the Amherst Island Station and training would have to be provided to personnel on this equipment and proper foam application.
- g. Emergency Response to Scheduled Maintenance
 - i. The Township requires a timeline for receipt of the schedule; e.g. a 7 day lead time on receiving regular maintenance activities notifications would be preferred.
- h. Emergency Response Protocol – Severe Thunderstorm and Lightning
 - i. Suggest that the protocol also identify what would occur in event that a lightning strike causes material/structural damage – emergency services to be notified; they have identified they would set up a safe perimeter / close road traffic as required and keep everyone out while allowing operations staff to deal with the situation.

- 7. Environmental Spill**
 - a. Clarify what is meant by “spill containment system.” (pg. 14) It isn’t discussed elsewhere.
- 8. Marine Safety**
 - a. Barge Activity and Dock Construction; this should state both Ambulance and Fire service in Emergency Situations, not just Ambulance.
- 9. Appendix A – Organizational Chart**
 - a. Clarify in the text/organizational chart how sub-consultants/contractors to be notified of/or report health and safety issues.
- 10. Appendix B – Amherst Island Wind Project Contact Information**
 - a. Need to include contact information for barge operations.
- 11. Appendix E - Municipal and Regulatory Contacts**
 - a. Suggest to include Township’s (i.e. AECOM’s) representatives, as well as Fire Chief
- 12. Note:**
 - a. We noted grammar/punctuation issues throughout (extra bullets, missing periods). Not listed individually as this is a Draft report.

Closing

David Kielstra and Guy Laporte, Senior Engineer, both of AECOM, have assisted in preparation of this letter.

Sincerely,
AECOM Canada Ltd.



Marissa Mascaro, P.Eng.
Project Engineer
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