

RISK MANAGEMENT PLAN (RMP) (SECTION 58, CLEAN WATER ACT)

Handling and Storage of Dense Non-aqueous Phase Liquids (DNAPL)

This document is a Risk Management Plan (RMP) under section 58 of the Clean Water Act, 2006 (the “Act”) for the protection of municipal wells and wellheads. It reflects current requirements of the Approved Assessment Report: Severn Sound Source Protection Area, the South Georgian Bay Lake Simcoe Source Protection Plan (approved: January 26, 2015; amended November 15, 2022) and the Act.

This RMP will be in effect on the date it is signed by the Risk Management Official (RMO). The activities listed in Section 2 below will be carried out in accordance with this RMP.

SECTION 1: SITE INFORMATION

45 Robillard Drive contains office space as well as two mechanical shops and one storage building.

OWNER INFORMATION

RMP HOLDER	The Wright Group Inc. / Maacon Construction Corporation		
Mailing Address:	45 Robillard Drive	Community:	N/A
Municipality:	Penetanguishene	Postal Code:	L9M 1G9
Land Use:	Retail / Commercial	Government / Institutional	<input checked="" type="checkbox"/> Industrial
Business Description:	Maacon Construction Corporation is a company that installs water main, sanitary and sewer services in the residential, commercial, and industrial sectors. The Wright Group is a trucking company.		

PRIMARY CONTACT INFORMATION

Title:	Owner	Name:	David Wright
Phone Number:	705-549-1066		
Fax Number:	705-549-2402	Email:	dwright@maacon.com
Subject Property:	45 Robillard Drive	Community	N/A
Municipality	Penetanguishene	Postal Code:	L9M 1G9

SECONDARY CONTACT INFORMATION

Title:	Safety Officer	Name:	Chris Chechak
Phone Number:	705-229-9350		
Subject Property:	45 Robillard Drive	Community	N/A
Municipality	Penetanguishene	Postal Code:	L9M 1G9

SOURCE PROTECTION DETAILS

Source Protection Region:	South Georgian Bay Lake Simcoe
Source Protection Area:	Severn Sound
Municipal Wellfield and wells:	Payette Drive; Wells 1, 2, and 3
Wellhead Protection Area:	C1
Vulnerable Score:	4
Applicable Source Protection Plan Policies:	DNAPL-1

SECTION 2: SIGNIFICANT DRINKING WATER THREAT ACTIVITIES:

The subject property is located within the Wellhead Protection Area C1 for the Payette Drive municipal drinking water supply. The vulnerability score in this area is 4. For this property, the handling or storage of dense non-aqueous phase liquids (DNAPLs) is a significant drinking water threat as defined by the Clean Water Act and associated regulations.

DNAPLs (pronounced dee-napple) are chemicals that are denser than water and do not dissolve readily in water. If spilled, they tend to sink into the ground and can contaminate our groundwater resources. These chemicals are also quite toxic to humans and / or the environment, even at low levels.

DNAPLs are listed in the Ministry of Environment, Conservation and Parks Table of Drinking Water Threats, and include:

- Dioxane-1,4 (stabilizer for chlorinated solvent)
- Polycyclic Aromatic Hydrocarbons (PAHs) (such as Naphthalene)
- Tetrachloroethylene (PCE)
- Trichloroethylene, or another DNAPL that could degrade to Trichloroethylene
- Vinyl Chloride, or another DNAPL that could degrade to Vinyl Chloride

INFORMATION ON CHEMICAL PRODUCTS HANDLED AND / OR STORED ON THE SITE, THE MAXIMUM ESTIMATED VOLUME PRESENT AT ANY ONE TIME, AND HOW THE CHEMICAL PRODUCTS ARE HANDLED AND / OR STORED: COMPLETE SDS ON FILE.

Chemical Type and/or Product Name:	# of Containers	Container Type	Container Volume (L)	Net Volume Stored (l)	SDS
1) Degreasers / cleaners	4	Portable	.473 L	1.89 L	Yes
2) Metal Paints	3	Cans	4 L	12 L	Yes
3) Marking Paint	43 cases /12	Cans	.473 L	244.07 L	Yes
4) Paint Strippers	N/A	Portable			
5) Adhesives	N/A	Portable			
6) Sealant	N/A	Portable			
Review date: July 19, 2023	Aggregate Volume: 257.96 L				

SECTION 3 APPLICABLE SOURCE PROTECTION PLAN POLICY

Policy DNAPL-1 of the South Georgian Bay Lake Simcoe Source Protection Plan (approved: January 26, 2015; effective: July 1, 2015; and amended November 15, 2022) reads as follows: "The existing handling and storage of DNAPLs (excluding incidental volumes for personal / domestic use) is designated for the purpose of Section 58 of the Clean Water Act, and therefore requires a Risk Management Plan where the activity is a significant drinking water threat. The risk management plan, at a minimum, will promote above ground storage and handling, and include terms and conditions to ensure the handling and storage of DNAPLs ceases to be a significant drinking water threat."

SECTION 4: IMPLEMENTATION SCHEDULE FOR RISK MANAGEMENT MEASURES

The RMP includes 7 mandatory Risk Management Measures categories listed below;

1. Chemical/Product Inventory
2. Chemical/ Product Storage
3. Chemical/Product Handling
4. Waste Disposal
5. Training
6. Inspections and Reporting
7. Spill Response

RISK MANAGEMENT MEASURES	CURRENT PRACTICE	FUTURE PRACTICE
1. CHEMICAL / PRODUCT INVENTORY		
An up-to-date SDS available from the product supplier, is available on-site for all hazardous chemicals	Implemented and to be maintained while DNAPLs are on site	
The operator should consider alternative, less-hazardous products. Where practical, solvent-based products with a specific gravity greater than 1.0 and products containing chlorinated solvents will be avoided. Product suppliers can be consulted to discuss potential alternative product that some businesses are using	Implemented and to continue to assess alternatives while the use of DNAPLs is in place	
2. CHEMICAL / PRODUCT STORAGE		
Hazardous chemical containers shall not be stored where they may be exposed to precipitation or runoff, except where the container and / or tank meets approval requirements (e.g., ULC/ORG; ANSI/API; CAN/CSA)	Currently implemented and to be maintained while DNAPLs are on site. Tanks meet approved requirements	
Hazardous chemicals should be stored in a location that minimizes risk of spills due to collision of equipment or vehicles, or other hazards	Currently implemented and to be maintained while DNAPLs are on site	
Keep storage areas clean and dry. Inspect storage areas for leaks and spills	Chemical storage inspection report completed monthly. To be maintained while DNAPLs are on site	
3. CHEMICAL / PRODUCT HANDLING		
Old, leaky, or damaged hazardous chemicals containers should be properly disposed of. If the product is still usable the product should be given a new container and/or label	Currently implemented and monitored by the monthly chemical storage inspection. To be maintained while DNAPLs are on site.	

4. WASTE DISPOSAL		
Contaminated absorbent material used for spill clean-up shall be disposed of appropriately based on the chemical that was spilled. An appropriate waste hauler will be consulted and employed as needed	Safety-Kleen is the contracted waste hauler used to remove spill contaminants if necessary and empty used DNAPLS as required. Double wall tanks are on site. Currently implemented and to be maintained while DNAPLS are on site	
Any unused hazardous chemicals shall be disposed of appropriately based on its chemical characteristics. A provincially approved waste disposal company, with the appropriate approval based on the hazardous chemical, shall be contacted for transfer and disposal of the unused hazardous chemical.	Currently implemented and to be maintained while DNAPL's are on site	
5. TRAINING		
Introduction training sessions for new employees as well as refresher training for longer term staff should include activities or products at the facility that may pose a risk to the environment. The measures in the Risk Management Plan will be reviewed and staff responsibilities will be explained	Currently implemented and to be maintained while DNAPL's are on site	
Employees responsible for spill response shall be trained to understand the contents of the spill response plan and know the location and proper use of spill response supplies and personal protective equipment. Employees trained shall be periodically refreshed	Currently implemented under the Environmental policy and Spill Containment Procedure. To be maintained while DNAPLS are on site	
6. INSPECTIONS		
Monthly inspections of all hazardous chemical storage areas shall be conducted. A checklist log shall be maintained that includes the following: <ul style="list-style-type: none"> • the date and person(s) responsible for the inspections • condition of all items inspected • quantities in storage 	Currently implemented and to be maintained while DNAPL's are on site	
Checklist logs from monthly inspections shall be kept on site and made available to the Risk Management Official / Risk Management Inspector upon request	Currently implemented and to be maintained while DNAPL's are on site	

Records of employee training regarding the Risk Management Plan and Spill Response Plan shall be maintained and provided to the Risk Management Official / Risk Management Inspector upon request	Currently implemented and to be maintained while DNAPL's are on site	
Where an oil/grit separator or interceptor is used on-site, the following records shall be maintained and provided to the RMO/RMI on request: records of clean-outs, including the date, the name of the company handling material removed, and a record of inspection indicating that the separator or interceptor is in proper working order. Additionally, if deficiencies were identified during the inspection, records of the corrective action taken shall be provided to the RMO/RMI on request.	Currently implemented and to be maintained while DNAPL's are on site	
7. SPILL RESPONSE		
The facility shall have a Spill Response Plan (or equivalent policies and procedures) and shall be posted in an easy to find and read location that specifies. a) The contents and location of the Spill Kits shall be identified. b) The procedures to be followed. c) Emergency Contact information (including Spills Action Centre and RMO/I. d)Forms available to record the details of the spill	Currently implemented and to be maintained while DNAPL's are on site	
The facility shall have a Site Plan that includes the locations of chemical/waste storage and handling areas (including loading and unloading) and the location of the spill kits. The Site Plan shall be posted in an easy to find location along with the Spill Plan Procedure	Currently implemented and will be maintained while DNAPL's are on site	
Absorbent and/or containment materials, as specified in the spill Response Plan for the facility, shall be on hand at all times for responding to spills of any reasonable size	Currently implemented and will be maintained while DNAPL's are on site	

SECTION 5: COMMUNICATION REQUIREMENTS

- The owner must contact the Risk Management Office /Person within 30 days prior to the sale, closure or relocation of the business/operation(s). The owner agrees to disclose to any purchaser the designated requirements as presented in the Risk management Plan.
- The Risk Management Plan Holder must contact the Town of Penetanguishene Risk Management Office/Person prior to any changes to the threat activities and any associated Risk Management Measures listed in section 4 and the Risk Management Official will determine if amendments to the Risk Management Plan are required.
- The Risk Management Plan holder must contact the Risk Management Official for the Town of Penetanguishene prior to any changes in primary and or alternate contact information and the Risk Management Official will determine if there are changes required.

SECTION 6: GENERAL

- This Risk Management Plan cannot be transferred to another person without the prior written consent of the Town of Penetanguishene Risk Management Official or designate.
- This Risk management Plan has been agreed to under the authority of the Risk Management Official appointed for the Town of Penetanguishene. This Risk Management Plan was developed in accordance with the Clean Water Act and the South Georgian Bay Lake Simcoe Source Protection Plan (Approved January 26, 2015, effective July 1, 2015, as amended November 15, 2022).
- The agreement of this Risk Management Plan and the implementation of the Risk Management Measures within it does not relieve any person of any obligation to comply with any provisions of any applicable statute, regulation or other legal requirement necessary to carry out activities at the location indicated in the attached map, including but not limited to obtaining all necessary authorizing instruments.
- The Risk Management Plan holder will ensure any person undertaking an activity listed under section 2 is aware of the contents of the Risk Management Plan and will take reasonable measures to ensure such persons comply with the Risk Management Plan.
- This Risk Management Plan should be on hand while an activity listed under section 2 is undertaken.
- Inspections by the Town of Penetanguishene Risk Management Inspectors will be completed to assess the implementation of the Risk Management Plan and appropriate actions under the Clean Water Act will be taken for any non-compliance. Any records or documentation requested by the Risk Management Official or Inspector will be provided to the Risk Management Official/Risk Management Inspector pertaining to the inspection.
- This Risk Management Plan remains in effect until such time that a notice is received from the Risk Management Official deeming that a Risk Management Plan is no longer needed.

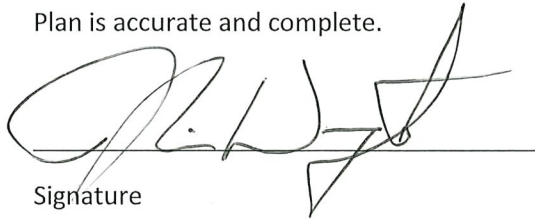
SECTION 7: DECLARATION AND SIGNATURES

RMP Number: 2020-02-001-RMP

Prepared by Melissa Carruthers. Risk Management Official / Risk Management Inspector for the Town of Penetanguishene and Chris Chechak Maacon Construction Health and Safety Officer for Maacon Construction.

Declaration

I, the undersigned, hereby declare that I have reviewed the contents of this Risk Management Plan and, to the best of my knowledge the information contained herein and attached to this Risk Management Plan is accurate and complete.



Signature
Dave Wright, Owner
The Wright Group Inc./
Maacon Construction Corporation

16 / 08 / 2023

Date
(DD/MM/YYYY)



Signature
Chris Chechak
Maacon Construction Safety Officer

16 / 08 / 2023

Date
(DD/MM/YYYY)

Signature
Melissa Carruthers, Risk Management Official
The Corporation of the Town of Penetanguishene
705-534-7283 ext. 205
mcarruthers@severnsound.ca

Date
(DD/MM/YYYY)

Notes:

All information in the RPM is subject to the Municipal Freedom of Information and Protection of Privacy Act. Information may also be provided to the Ministry of the Environment, Conservation and Parks (or their successors), other regulatory bodies and/or local municipalities.

Reviewed: _____

Revised: July 19, 2023

Section 8: Attachments and Schedules

Appendix 1 – Map of Subject Property with Wellhead Protection Area (WHPA) and Vulnerability Scores shown

