

**Environmental Management Plan:
Dalhousie University - Thermal Plant
Version 1**

Dalhousie University
1236 Henry Street
Halifax, NS

Prepared for:
Dalhousie University
Facilities Management Department

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Version	Date of Change	Name	Details
1	October 20, 2016	Stantec Consulting Ltd. on behalf of Darrell Boutilier, Director of Operations, Facilities Management	Developed Plan in support of Approval to Operate 1999-011513-R01
2	Feb. 8, 2023	Roger Lloy, Central Plant Manager	Updates to reflect new plant equipment

1.0 INTRODUCTION

Dalhousie University is committed to providing a safe and healthy workplace for its employees, students and visitors, and to protect public health and safety, the environment, and property. The University's Facilities Management Department operates the Dalhousie University Thermal Plant. At the request of Nova Scotia Environment (NSE), the Facilities Management Department has developed and implemented this Environmental Management Plan (EMP) for the Thermal Plant.

1.1 PURPOSE

The Facilities Management Department operates the Thermal Plant under an Approval to Operate (Approval No. 1999-011513-R01, dated July 21, 2016) issued by NSE authorizing the operation of the Dalhousie University Thermal Plant and associated works in Halifax, Nova Scotia, pursuant to the provincial *Environment Act*. A copy of the current Approval is provided in Appendix A. The Approval includes requirements related to this EMP, noise emissions air quality emissions, spills, releases, fuel management, liquid and solid waste management, dangerous/waste dangerous goods management, environmental emergency response, and facility closure. The Facilities Management Department is committed to operating the Thermal Plant in accordance with this Approval.

The purpose of the EMP is to document the Facilities Management Department's approach to environmental management and commitment to operating the Thermal Plant in accordance with relevant environmental legislation and expectations. The EMP documents operating practices and procedures required to assist the Facilities Management Department to ensure that the Thermal Plant is operated in compliance with relevant environmental legislation and permits, including the Approval. The EMP also provides contingency procedures to be activated the event of an environmental emergency and/or public concerns.

1.2 SCOPE

The EMP applies environmental requirements associated with the operation of the Dalhousie University Thermal Plant located at 1236 Henry Street in Halifax, Nova Scotia (PID No. 41108911). The Thermal Plant consists of the one building (Central Services Building) and asphalt paved access/parking. The Central Services Building contains: offices; cubicles; conference and meeting rooms; a laboratory; workshops; maintenance facilities; storage areas; storage tanks; and a power plant.

1.3 ROLES AND RESPONSIBILITIES

The EMP includes environmental requirements associated with the operation of the Dalhousie University Thermal Plant. Key roles and responsibilities related to the EMP are described below.

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Plant Personnel: Plant Personnel are responsible for attending training relevant to their job descriptions related to this plan and implementing this EMP. Plant Personnel are also responsible for informing their Supervisor of any observed or reported incident or emergency and attending training relevant to their job descriptions related to the Contingency Plan.

Plant Supervisors: Plant Personnel are responsible for attending training relevant to their job descriptions related to this plan, ensuring the Plant Personnel under their supervision receive training relevant to their job descriptions, and implementing this EMP. Plant Supervisors are responsible for informing the Central Plant Manager/Director of Operations of the Facilities Management Department of any observed or reported incident or emergency, and attending training relevant to their job descriptions related to the Contingency Plan.

Central Plant Manager: The Central Plant Manager is responsible for implementing the both the EMP and the Contingency Plan. The Central Plant Manager is also responsible for implementing the Contingency Plan and associated records are being maintained.

Director of Operations of the Facilities Management Department: The Director of Operations of the Facilities Management Department has the overall responsibility for the operation of the Thermal Plant and the maintenance and implementation of both the EMP and the Contingency Plan. The Director of Operations of the Facilities Management Department is responsible for ensuring that these plans are reviewed and updated on an annual basis.

1.4 DISTRIBUTION

The EMP is maintained by the Facilities Management Department and can be found electronically in their Meridian Document Management System under Environmental Management Plan. The Central Plant Manager will ensure that Plant personnel are aware of where the EMP is available.

Records associated with EMP are also maintained by the Facilities Management Department and can be found electronically in their Meridian Document Management System under Environmental Management Plan.

1.5 REVIEW

To ensure continual improvement and environmental performance, the Facilities Management Department is committed to reviewing the EMP on a regular basis (at least annually) and updating and implementing changes where required. Revisions to the EMP must be reviewed and approved by the Central Plant Manager and the Director of Operations of the Facilities Management Department.

In addition to the annual review, the EMP will be reviewed whenever any of the following occurs:

- when process changes are made; or

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- when there are changes to legislation that may warrant plan revisions.

A version number is assigned to the modified document to ensure document control. A summary of the changes and improvements to the EMP is provided to NSE as part of the Thermal Plant's Annual Report.

2.0 ENVIRONMENTAL MANAGEMENT PLAN

The components of the EMP for the Dalhousie University Thermal Plant are outlined in the following sections.

2.1 ENVIRONMENTAL COMPLIANCE REPORTING

The Facilities Management Department has implemented an environmental compliance reporting program for the Thermal Plant in accordance with their NSE Approval to Operate. Reports demonstrating the status of operation of Thermal Plant with the Approval are maintained on a quarterly basis, and submitted to NSE annually. The reports summarize the status of operation of the facility related to the requirements in Section 13 of the current Approval, as summarized below:

- A summary indicating the total SO_x TSP and NO_x emissions produced from the facility.
- A summary of opacity data including monthly summary tables, daily averages, descriptions of events during which opacity requirements in the Approval were exceeded, and a summary of any operational problems associated with the opacity monitors.
- A summary of reconciliation of the fuel storage tank inventory control program.
- A summary of the quantity and type of wastes (i.e., sludges, waste dangerous goods, tank bottoms, processing wastes, and solid wastes).
- A summary of complaints received from the public regarding the operation.
- A summary of any changes to the EMP.
- A summary of any air quality related emergencies or incidents.
- A summary of any emergency or upset conditions.
- A summary of any violations to conditions in the Approval and actions taken to correct them.

2.2 EMERGENCY RESPONSE REPORTING

The Facilities Management Department will report spills or releases in accordance with the provincial *Environment Act* and *Environmental Emergency Response Regulations* as outlined in the Contingency Plan. A summary of the environmental emergencies is provided to NSE as part of the Thermal Plant's Annual Report.

2.3 PROCEDURE FOR ADDRESSING COMPLAINTS

The Facilities Management Department has developed and implemented a procedure for addressing complaints from the public regarding unfavorable environmental impacts associated with the operation of the Thermal Plant. If Dalhousie University receives a complaint from the public regarding unfavorable environmental impacts associated with the operation of the Thermal Plant, Facilities Management Department personnel will implement the following procedure:

- Complaints from the public (e.g., external agencies or individuals) regarding unfavorable environmental impacts associated with the operation of the Thermal Plant will be directed to the Director of Operations of the Facilities Management Department and Central Plant Manager immediately upon receiving the complaint.
- Once notified of the complaint, Central Plant Manager and Director of Operations of the Facilities Management Department will immediately assess and respond to the complaint or incident accordingly. Where feasible and required, remedial action will follow.
- The Director of Operations of the Facilities Management Department will contact the Office of Communications and Marketing, if required.
- The Director of Operations of the Facilities Management Department or the Office of Communications and Marketing will contact and communicate results of the assessment to the agency or individual who initiated the complaint, as appropriate.
- The Facilities Management Department will maintain electronic records of complaints received from the public associated with the operation of the Thermal Plant, including:
 - the date and time;
 - steps taken to determine the cause of the complaint;
 - the corrective action taken to alleviate the cause and prevent its recurrence; and
 - the response to the complainant.
- A summary of complaints received from the public regarding the operation provided to NSE as part of the Thermal Plant's Annual Report.

2.4 SOUND LEVELS

Sound levels from the operation of the Dalhousie University Thermal Plant will be maintained at a level not to exceed the following equivalent sound levels at the property boundaries:

65 dBA - 7:00 - 1900 hrs.
60 dBA - 1900 - 2300 hrs.
55 dBA - 2300 - 0700 hrs.

Noise monitoring will be conducted at the direction of NSE.

2.5 AIR QUALITY MANAGEMENT

The primary sources of air emissions from the Thermal Plant consists of one original steam boiler and its original stack, and two new boilers, one (2022) using one of the original stacks and the other with a new stack (2021). The Thermal Plant also includes a diesel-fired emergency back-up generator and three chillers. Sources of air emissions are managed as outlined below.

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The Facilities Management Department is committed to managing air emissions from the Thermal Plant in accordance with the applicable provincial legislation and Section 5 of Approval to Operate for the Thermal Plant.

2.5.1 Ambient Air Quality Management

The Facilities Management Department understands that air emissions from the Thermal Plant must not result in an exceedance of the maximum permissible ground level concentrations specified in Schedule "A" of the provincial *Air Quality Regulations* (N.S. Reg. 28/2005). The Facilities Management Department will conduct ambient air monitoring at the direction of NSE.

2.5.2 Stack Emissions Management

The Thermal Plant includes three stacks associated with steam boilers. In 2010, the existing oil-fired boiler heating system was converted to natural gas. Bunker fuel continues to be burned as a peaking fuel in the original boiler & #2 Fuel Oil is used in the two new boilers (typically between December and April) and emergency back-up fuel. Currently, approximately 90 percent of the fuel burned at the Thermal Plant is natural gas. Procedures related to the stack emissions management at the Thermal Plant include:

Continuous Emission Monitors (CEMs):

All three boiler stacks are equipped with a CEM. The CEMs are operated in accordance with the manufacturer's instructions. Outputs from the CEMs are continuously logged. Records of outputs from CEMs are maintained by operators in the Control Room. The availability of CEMs is tracked by operators in the Control Room. Reasons for unavailability and records of operational problems, including the date and time, are maintained electronically. This information provided to NSE as part of the Thermal Plant's Annual Report.

Preventative Maintenance Program:

Stacks, ductwork and CEMs are maintained in accordance with a Preventative Maintenance Program developed by the Facilities Management Department. As part of this program, CEMs associated with boiler stacks are serviced, cleaned, and calibrated annually, and stacks and ducting from the boiler are serviced and cleaned annually. Preventative maintenance is scheduled and tracked through the plant's electronic FAMIS preventative maintenance system.

2.5.3 Management of Ozone-Depleting Substances

The Thermal Plant includes two chillers containing R-514A. The Facilities Management Department understands that ODS at the Thermal Plant must be managed in accordance with the provincial *Ozone Layer Protection Regulations* (N.S. Reg. 54/95) as well as other applicable legislation and codes of practice. Procedures related to the management of ODS at the Thermal Plant include:

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- Equipment containing ODS is serviced by persons who have successfully completed an approved environmental awareness course.
- Persons servicing equipment containing ODS will recover ODS that would otherwise be released into the atmosphere.
- Persons servicing equipment containing ODS will not recharge or add an ODS to equipment unless they conduct a leak test in accordance with applicable legislation and codes of practice. If a leak test reveals a leak, persons servicing equipment containing ODS will not recharge or add an ODS to equipment unless they have effectively repaired the leak.
- Equipment containing ODS will not be disposed of unless the ODS is recovered.

2.6 ENVIRONMENTAL EMERGENCY RESPONSE

To respond quickly and successfully in the event of an environmental emergency, the Facilities Management Department has developed and implemented a Contingency Plan for the Thermal Plant. As Dalhousie University has a separate Crisis Management Plan for the university, the Contingency Plan for the Thermal Plant is intended to supplement the Crisis Management Plan and provide a mechanism to identify potential environmental emergencies related specifically to the operation of the Thermal Plant and how to prevent, prepare, respond, and recover from the associated adverse environmental impacts. A copy of the Contingency Plan is attached (Appendix B).

2.7 FUEL MANAGEMENT

Table 1 provides a summary of the six petroleum storage tank systems used to store fuel at the Thermal Plant.

Table 1 Summary of Fuel Storage Tank Systems On-site

Tank Registration Number	Type of Tank	Year of Manufacture	Capacity	Substance Stored	Location
2017-099463-001	Single Wall, Metal, Insulated, Equipped with Secondary Containment	1970	90,922 L (20,000 imp. gal.)	#2 fuel, Furnace Oil	Room 001, Fuel Storage, Basement
2017-099463-002	Single Wall, Metal, Insulated, Equipped with Secondary Containment	1970	90,922 L (20,000 imp. gal.)	#2 fuel, Furnace Oil	Room 001, Fuel Storage, Basement
2017-099463-003	Single Wall, Metal, Insulated, Equipped with Secondary Containment	1970	90,922 L (20,000 imp. gal.)	Bunker fuel	Room 002, Fuel Storage, Basement
2017-099463-004	Single Wall, Metal, Insulated, Equipped with Secondary Containment	1970	90,922 L (20,000 imp. gal.)	Bunker fuel	Room 002, Fuel Storage, Basement

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Table 1 Summary of Fuel Storage Tank Systems On-site

Tank Registration Number	Type of Tank	Year of Manufacture	Capacity	Substance Stored	Location
2017-099463-005	Single Wall, Metal, Insulated, Equipped with Secondary Containment	1970	4950 L (1,100 imp. gal.)	Diesel fuel	Room 006, Fuel Storage, Basement
Not required	Single Wall, Metal, Insulated, Equipped with Secondary Containment	2000	1,137 L	Diesel fuel	Room 003, Pump Room, Basement

Storage tank management procedures at the Dalhousie University Thermal Plant are based on the requirements of applicable legislation (provincial *Petroleum Management Regulations*, N.S. Reg. 44/2002), standards and permits as well as Approval No. 1999-01 1513-R01 and this EMP.

Storage tank management procedures at the Thermal Plant will include, the following:

Inventory Control Program:

- The fuel storage tank systems located at the Thermal Plant are connected to heating appliances. As such, the storage tank systems are protected with secondary containment systems and leak monitoring devices. The secondary containment areas associated with the petroleum storage tanks constructed of concrete, and designed to be liquid tight and retain 110% of the capacity of the largest tank. Each secondary containment system is equipped with a leak monitoring device.
- The fuel storage tanks are equipped with fuel level sensors. Fuel levels are tracked in the Control Room.
- Daily visual inspections of aboveground storage tank systems to ensure that there has been no leakage in the containment system will be conducted every day they are in operation.
- Fuel inventory records are maintained electronically and include:
 - Fuel shipments (in and out) of the plant, including tank, volume, and date;
 - Volume being stored in each tank;
 - Volume consumed.
- A summary of inventory control program is provided to NSE as part of the Thermal Plant's Annual Report.

Preventative Maintenance Program:

Fuel storage tank systems, including secondary containment areas, are maintained in accordance with a Preventative Maintenance Program developed by the Facilities Management Department. Preventative maintenance is scheduled and tracked through the Plant's electronic FAMIS preventative maintenance system. This program includes:

- Annual maintenance checks on electrical and mechanical leak detection systems are conducted.
- Annual visual assessments of secondary containment area(s) associated with fuel storage tank systems for deficiencies such as cracks and spalling are conducted.
- Periodic storage tank inspections, including emptying, cleaning and servicing, are conducted and documented.

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- Periodic third-party audits of petroleum storage tank systems to assess compliance with applicable legislation and permits will be conducted.
- When there is an indication of a corrosion protection system failure or a mechanical problem, the storage tank system will be immediately repaired and NSE will be notified of the repair within three 3 days of completion of the repair.

Fuel Loading Procedures:

- Visual documented inspections are conducted at the tankage and associated piping during loading and unloading of product.

Petroleum Storage Tank Decommissioning:

- Storage tank systems will be removed, decommissioned or re-used as outlined in the provincial *Petroleum Management Regulations*.
- NSE will be notified of the proposed tank removal in writing at least 3 working days prior to the starting date of the removal.
- Storage tank systems that are considered out of service (i.e., aboveground storage tank systems that have been unused for 12 consecutive months or more) will be managed as outlined the provincial *Petroleum Management Regulations*.

Petroleum Storage Tank Installation:

- New petroleum storage tank systems will be designed, installed and registered as outlined in the provincial *Petroleum Management Regulations*.

2.8 LIQUID AND SOLID WASTE MANAGEMENT

Liquid and solid wastes generated by the Thermal Plant are managed as outlined in the following sections.

2.8.1 Process Wastewater Management

Boiler blow down generated at the Thermal Plant is discharged to municipal sewer system.

2.8.2 Sanitary Wastewater Management

Sanitary wastewater generated at the Thermal Plant is discharged to municipal sewer system.

2.8.3 Stormwater Management

Buildings and paved driveways and parking areas cover a large part of the surface area of the Thermal Plant property. Stormwater from roof drains and paved parking areas is directed to the municipal stormwater system.

2.8.4 Solid Waste Management

Dalhousie University has developed and implemented a solid waste management program for the university in accordance with the provincial *Solid Waste-Resource Management Regulations* (NS Reg. 25/96).

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Dalhousie University uses a comprehensive source separation system to manage municipal solid waste (Table 2). Solid waste disposal at the Thermal Plant is conducted through the University's integrated waste management service provider.

Table 2 Summary of Municipal Solid Waste Management

Type of Solid Waste	Method of Management	Method of Disposal
Mixed Waste (i.e., garbage, refuse, etc.)	Source separated at waste collection bins found throughout the building. Collected by custodian on a daily basis. Stored in a designated bin on the exterior north side of the building. Collected and compacted with like waste from other university sources on a regular basis by a Dalhousie University hauler.	Collected on a regular basis (approximately every two days) by contractor and sent to a local municipal landfill facility.
Organic Materials (i.e., food waste, wax paper, paper plates, etc.)	Source separated at waste collection bins found throughout the building. Collected by custodian on a daily basis. Stored in the building in designated green bins for organics.	Collected on a regular basis (approximately every two days) by contractor and sent to a local municipal compost facility.
Paper	Source separated at waste collection bins found throughout the building. Collected by custodian on a daily basis. Stored in the building in designated grey bins for paper.	Collected on a regular basis (approximately every two days) by contractor and sent to a municipal landfill facility for recycling.
Recyclable Materials (i.e., glass, metal, etc.) and Redeemable Beverage Container	Source separated at waste collection bins found throughout the building. Collected by custodian on a daily basis. Stored in the building.	Collected on a regular basis by local not-for-profit group and sorted. Recyclables are sent to a municipal landfill facility for recycling. Refundables are sent to ENVIRO-DEPOT™. Refunds are used to support the not-for-profit group.
Cardboard	Collected by custodian on a daily basis. Stored in the building. Collected and compacted with cardboard from other university sources on a regular basis by a Dalhousie University contractor.	Collected on a regular basis (approximately every two days) by contractor and sent to a local municipal landfill facility for recycling.

2.9 DANGEROUS GOODS AND WASTE DANGEROUS GOODS MANAGEMENT

Dangerous goods and dangerous waste goods generated by the Thermal Plant are managed as outlined in the following sections.

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2.9.1 Dangerous Goods On-site

Dangerous goods used and stored at the Thermal Plant consist of various laboratory chemicals and maintenance and operation chemicals. These dangerous goods are stored in various plastic, glass and/or metal containers/drums in designated areas. The Facilities Management Department is in the process of developing an inventory of dangerous goods used and stored at the Plant.

2.9.2 Waste Dangerous Goods On-site

Waste dangerous goods generated at the Thermal Plant is typically limited to waste oils and used rags associated with maintenance operations. Table 3 outlines the types, quantities, method of storage, storage location and method of disposal of waste dangerous goods generated at the Plant. A summary of the waste dangerous removed from the plant is provided to NSE as part of the Thermal Plant's Annual Report.

Table 3 Summary of Waste Dangerous Goods Generated at Thermal Plant

Type of Waste Dangerous Goods	Method of Storage	Location of storage	Method of Disposal
Boiler Soot	Sealed drums stored in secondary containment area	Water Treatment Chemical Storage Room, 1 st Floor	Collected on a regular basis by a qualified hazardous waste management service provider for processing and/or disposal.
Waste Oils	Sealed drums stored in secondary containment area	Water Treatment Chemical Storage Room, 1 st Floor	Collected on a regular basis by a qualified hazardous waste management service provider for processing, recycling and/or disposal.
Used Rags and similar materials contaminated with petroleum products	Sealed drums stored in secondary containment area	Water Treatment Chemical Storage Room, 1 st Floor	Collected on a regular basis by a qualified hazardous waste management service provider for processing, recycling and/or disposal.
Chemical Residuals	Sealed drums stored in secondary containment area	Water Treatment Chemical Storage Room, 1 st Floor	Collected on a regular basis by a qualified hazardous waste management service provider for processing, recycling and/or disposal.

2.9.3 Management Procedures

Dangerous goods and waste dangerous goods will be managed in accordance with the provincial *Dangerous Goods Management Regulations* (N.S. Reg. 56/95), Approval No. 1999-011513-R01 and this EMP.

Dangerous goods and waste dangerous goods management procedures at the Thermal Plant include, the following:

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Inventory:

- An inventory of dangerous goods and dangerous waste goods will be maintained on a monthly basis by the Facilities Management Department. The inventory will include:
 - Generic/trade name;
 - the appropriate classification under the *Transportation of Dangerous Goods (TDG) Regulations (Canada)*;
 - the typical quantity stored;
 - identification of known major environmental hazards associated with the material; and
 - the name of the manufacturer/distributor/producer.
- Safety Data Sheets (SDS) are maintained on a regular basis by the Facilities Management Department.

Loading Area Requirements:

- Dangerous goods are received by Plant personnel in the loading area.
- The loading area is equipped with appropriate spill response equipment.
- Plant personnel working in the loading area will be training in environmental emergency response.
- Incompatible materials received in the loading area are separated in accordance with the National Fire Code and information provided in the SDS.

Storage Container Requirements:

- Dangerous goods at the plant are typically stored in their original container. If dangerous goods are transferred to another container, the Facilities Management Department confirms that the materials used to construct the new container are compatible with the dangerous goods being stored.
- Dangerous goods received at the plant are typically legibly and permanently labeled. If dangerous goods are transferred to another container or it is observed that the label associated with a container of dangerous is illegible, the Facilities Management Department will replace the label in accordance with legislated requirements.
- Containers used to store dangerous goods are kept closed when not in use.

Storage Area Requirements:

- Dangerous goods are stored according to compatibility. Incompatible materials are separated in accordance with the National Fire Code and information provided in SDS. If incompatible materials are stored in a location where an opportunity for accidental or uncontrolled contact may occur, the incompatible materials are segregated and separated by a barrier designed, constructed and maintained to prevent contact between the incompatible materials.
- Dangerous goods storage areas are secured from public entry, prominently identified using placards prescribed in the *TDG Regulations (Canada)* to properly describe the dangerous goods being stored, equipped with suitable spill response equipment, and secured to prevent spilled or leaked dangerous goods from entering the environment or causing an adverse effect.
- Dangerous goods are stored in areas with floors constructed of impervious materials.
- The storage and handling of dangerous goods is not conducted in proximity to open floor drains.
- Portable transfer pumps located at the plant have switches/panels allowing for immediate shutoff.

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- Dangerous goods storage areas will be organized so that there is sufficient aisle space between containers to allow unobstructed movement of persons, equipment and fire suppression systems in the event of an environmental emergency.
- Flammable materials are stored in flammable storage areas or flammable storage cabinets.

Preventative Maintenance Program:

Dangerous goods stored at the plant are used on a regular basis. Areas used to store dangerous goods are generally visually assessed for leaks by Facilities Management Department on a weekly basis.

Areas used to store dangerous goods, including secondary containment areas, are maintained in accordance with a Preventative Maintenance Program developed by the Facilities Management Department. Preventative maintenance is scheduled and tracked through the Plant's electronic FAMIS preventative maintenance system. This program includes:

- Annual visual assessments of secondary containment area(s) associated with dangerous goods for deficiencies such as cracks and spalling.
- Quarterly documented visual assessments of areas used to store dangerous goods to assess compliance with storage requirements outlined in provincial *Dangerous Goods Management Regulations*, Approval No. 1999-011513-R01 and/or this EMP.

2.10 EMPLOYEE ENVIRONMENTAL TRAINING

Dalhousie University is committed to ensuring that Plant personnel have appropriate environmental training and are familiar with the responsibilities and procedures outlined in the EMP. Table 4 outlines environmental training requirements.

Table 4 Required Environmental Training

Training	Frequency
Workplace Hazardous Materials Information System (WHMIS) Training	All new personnel; Annually
Product-Specific Training	All new personnel; Annually
TDG Training	Central Plant Manager; Every 3 years
EMP Training	All new personnel; Annually
Environmental Emergency Response Training	All new personnel; Annually

It is the supervisor/manager responsibility to ensure that new employees get trained. The Training Manager maintains environmental training records electronically in the Meridian Document Management System under Environmental Management. The Training Manager also periodically reviews environmental training requirements. Refresher training is provided, as required.

The need for additional training such as fall arrest and confined space, and/or respiratory fit testing will be determined, as required.

APPENDIX A
Copy of Existing Approval

APPENDIX B
Copy of Existing Contingency Plan