

**Saint John Energy**  
***ISO 14001 Environmental***  
***Management System***  
***(EMS) Manual***



*Originally Submitted by*

**Dillon Consulting Limited**

*June 2015 Revision 23*

## AMENDMENT LIST

MANUAL TITLE: ISO 14001 Environmental Manual MANUAL NO.

Form: April 2000 Revision 1

DATE yr/mo/dy	AMENDMENT #	DESCRIPTION	INITIAL
05/04/29	12	Revision Master List, Pg#4 Policy, Aspects, Pg#12-13 Objectives & Targets, Regulatory & Other, Management Review	DBY
06/04/12	13	Pg#12-13 Objectives & Targets, Appendix C, Revision Master List	DBY
07/02/28	14	Policy, Tables 3.2 and 3.3, Procedures 4.5 and 4.11 List (Appendix B), Form List (Appendix C)	DBY
08/03/14	15	Tables 3.1 and 3.3, Procedure 4.6 (Appendix A – Aspects), Appendix C)	
09/03/10	16	Amendment List, Master List, Objectives & Targets Table 3.1 Aspects, 4.6 Operational Controls, Appendix A Aspects Evaluation, Appendix C Contractor Form	DBY
10/01/29	17	3.2.2 Pg 12 Other Requirements, Proc 3.4 Pg 16 SEP Program, Proc 3.5 Pg 17 Pollution Prevention, Appendix A Aspect Evaluation, Pg 13-14 Objectives & Targets, Proc 4.10 Resource Management	DBY
11/03/03	18	Table 3.2 and Table 3.3 Objectives and Targets, Pg. 2 Scope and Introduction, Pg. 5 Policy Statement, Pg. 11 Legal Requirements, Pg. 22 Organizational Chart, Pg. 28 Proc 4.6 Operational Controls	DBY
12/03/8	19	Table 3.2 and Table 3.3 Objectives and Targets, App A Aspect Impact Evaluation Table, Proc 3.7, Proc 5.1	DBY
13/06/03	20	Policy, Table 3.2 and Table 3.3 Objectives and Targets, Proc 3.5, Proc 4.6, Appendix A, Proc 4.8, Proc 5.1, Tables 3.1, Proc 3.2, Proc 3.5, 4.1 Structure & Responsibility, Proc 4.1, Proc 4.3, Proc 4.5, Proc 4.10, Proc 5.4,	DBY
14/03/21	21	Policy, Table 3.2 Objectives and Targets, Appendix B, Appendix C, Proactive Hazard Report Form	DBY
15/02/20	22	3.2 Objectives and Targets, 4.1 Structure and Responsibility, Proc 5.2, Appendix C-Proactive Hazard Report Form,	DBY
15/06/15	23		

**SAINT JOHN ENERGY  
ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM  
IMPLEMENTATION MANUAL**

**DILLON CONSULTING LIMITED  
Fredericton, New Brunswick**

*March 2009 Revision 16*



**EMS Implementation Manual**

**Revision Master List**

<b>EMS ELEMENT</b>	<b>REVISION</b>	<b>DATE</b>
2.0 Policy Statement	10	Jan 2014
Procedure 3.0 Identification of Aspects	1	Dec 2000
Table 3.1 Identification of Environmental Aspects	7	Mar 2009
3.2 Legal and Other Requirements	7	Sept 2009
Table 3.2 Objectives And Targets from the Policy Statement	16	Jan 2015
Table 3.3 Objectives and Targets from Environmental Aspects	14	Jan 2013
Procedure 3.1 Achievement of Policy Goals	1	April 2000
Procedure 3.2 Regulatory Requirements Compliance	7	Jun 2013
Procedure 3.3 Maintain an EMS Compatible with ISO 14001	2	Jan 2001
Procedure 3.4 Meeting Requirements of CEA SEP Sustainable Electricity Program	2	Sept 2009
Procedure 3.5 Development of Pollution Prevention / Environmental Improvement Plans	4	Jun 2013
Procedure 3.6 Continual Improvement	2	Jan 2001
Procedure 3.7 Use of Unsustainable Products/Materials	5	Jun 2013
Procedure 3.8 Establishing Objectives and Targets	2	Oct 2000
4.1 Structure And Responsibility	5	Jun 2013
Figure 4.1 Organization Chart	4	Mar 2011
Procedure 4.1 Personnel Training And Competence	3	Jun 2013
Procedure 4.2 Promoting Awareness of The EMS	3	Jan 2001
Procedure 4.3 Internal External Communication	3	Jun 2013

2.0	Policy Statement	10	Jan 2014
Procedure 4.4	Application of EMS Manual	3	May 2001
Procedure 4.5	Document Control	6	Jun 2013
4.6	Operational Controls	3	Mar 2003
Procedure(s) 4.6	Operational Controls	8	Jun 2013
Procedure 4.7	Solid Waste Management	2	Mar 2012
Procedure 4.8	Hazardous Waste Generation / Handling / Accidental Discharge	2	Jun 2013
Procedure 4.9	Generation of Exhaust / Fugitive Dust / Noxious Fumes	2	Oct 2000
Procedure 4.10	Resource Management	4	Jun 2013
Procedure 4.11	Emergency Spill Response	3	Feb 2007
Procedure 5.1	Monitoring and Measurement	5	Jun 2013
Procedure 5.2	Identifying Non Conformance And Determining Corrective And Preventative Action	2	Jan 2015
Procedure 5.3	Records Maintenance	2	Jan 2001
Procedure 5.4	Conducting Internal Audits	3	Jun 2013
Procedure 6.1	Management Review	3	Apr 2005

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## **1.0 SCOPE AND INTRODUCTION**

**SCOPE:** The environmental management system (EMS) as it applies to the distribution of electricity, including building maintenance, administration activities, purchasing, fleet management and field activities (substation, street and city lighting, pole and wire maintenance).

**INTRODUCTION:** An increasing number of businesses are reflecting a current trend in Canada and elsewhere to integrate the management of environmental issues pertaining to their company with all other aspects of the business. Such organizations are working to ensure that each of the components of their activities take in to account what is in the best interest of the customer, the company and the environment, both for the present and for the future.

A common tool now available for organizations wishing to adopt this approach is implementation of an Environmental Management System (EMS) which adheres to the principles of ISO 14001. Saint John Energy (SJE) has committed to such a sustainable approach to operations through their membership in the Canadian Electricity Association (CEA). The Association has stipulated that member distribution utilities must have an ISO 14001 compatible or registered EMS. The development and implementation of SJE's EMS will ensure that SJE continues to conduct its business in a proactive, environmentally accountable, and socially acceptable manner.

Saint John Energy's Environmental Management System is a comprehensive system for managing all environmental aspects of the utility and integrating environmental matters into the utility's overall management system. The EMS will serve as a planning tool to allow SJE to continually improve and refine its operations.

March 4 2011 Revision 3



This EMS Implementation Manual details policies and procedures to be adopted by SJE to allow for sound environmental management in all areas of its operation. Effective use of the EMS will allow SJE to achieve and maintain acceptable environmental performance by controlling the impact of their activities on the environment. The EMS will provide a structured process for achievement of continual improvement and thus ensure improved environmental performance. The EMS is an integral part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

SJE has utilized the standard described in the International Organization for Standardization (ISO) 14001 as issued by the Standards Council of Canada as CAN/CSA-ISO 14001-04 "Environmental Management Systems - Specifications with Guidance for Use". The approach to implementation is defined as a model, which is shown on Figure 1, and shows the sequence from the policy to planning, implementation and operation, checking and corrective action and management review. The principle of continual improvement is provided by the "checking and corrective action" item in the model from which corrective/improvement items are regularly fed into the system resulting in updating of the procedures as appropriate.

The commitments defined above and the approach presented in Figure 1 has been reflected in this EMS Implementation Manual. The document is structured to reflect the general headings defined in ISO 14001. Periodic reviews will be conducted to evaluate the performance of the EMS and identify potential improvement opportunities.

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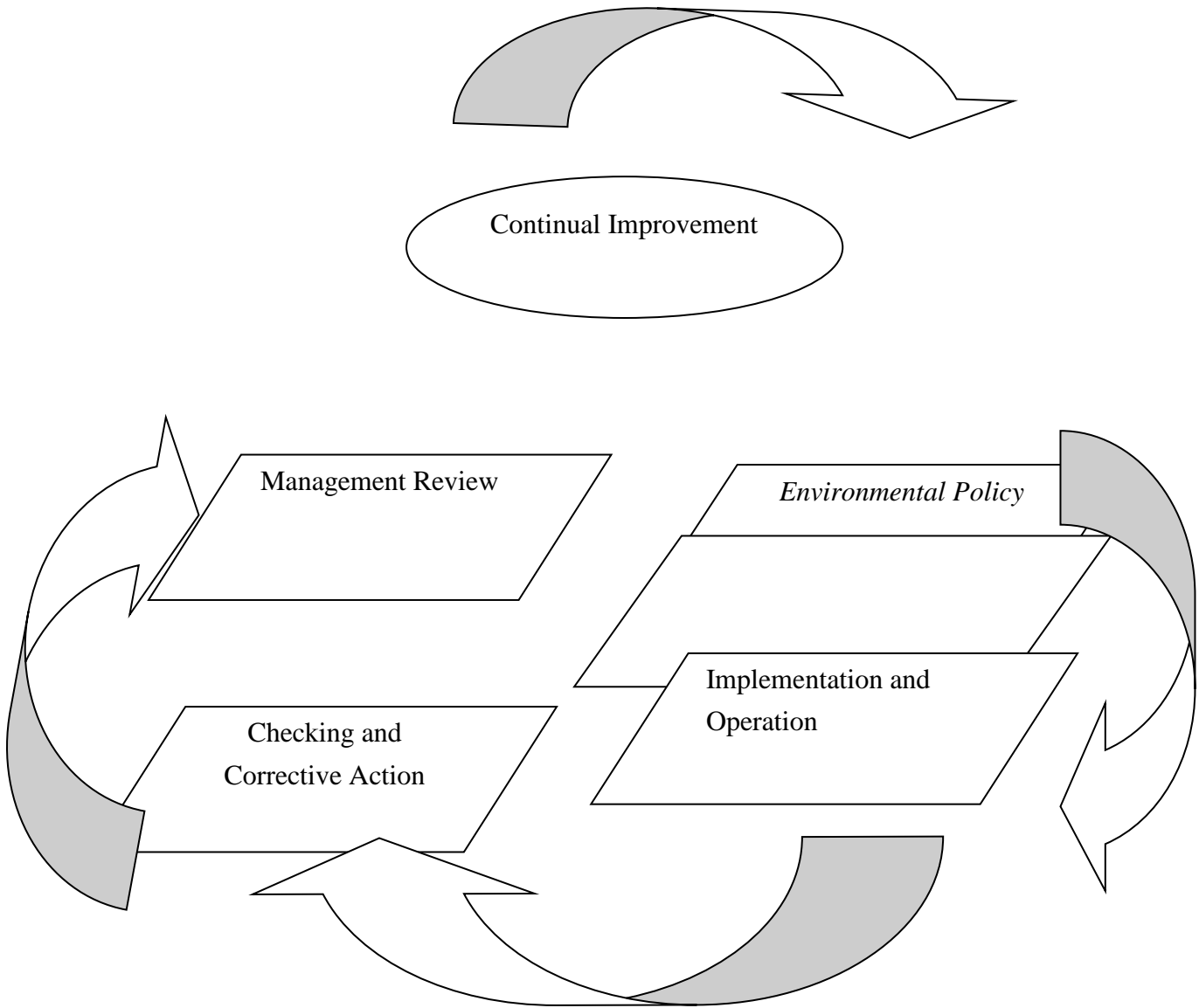


Figure 1  
Environmental management system model for this  
*International Standard*

Figure 1 - Environmental Management System Model for this International Standard.

Source: CAN/CSA-ISO 14001-04

April 2005 Revision 3

## **2.0 POLICY STATEMENT**

### **Environmental Motto: We respect the environment we work and live in.**

Saint John Energy is committed to the achievement of excellence and innovation in protecting the environment of the City of Saint John, while meeting its mandate to provide economic and reliable energy to the people of Saint John. The Power Commission of the City of Saint John considers that the environmental performance of its system is as important to its customers as the quality of the service which they receive. The following commitments define the overall components by which the Commission will address its environmental affairs:

- SJE will consistently comply with, or exceed, all environmental regulatory requirements applicable to its planning and operational functions;
- SJE will monitor all environmental activities associated with its energy distribution, field work, fleet management, building maintenance, water heater program, purchasing and administration;
- SJE will conduct its business within a framework of a corporate Environmental Management System (EMS) compatible with the standards and philosophy described in the standard CAN/CSA-ISO 14001-04, approved by the Standards Council of Canada;
- SJE will reference the ISO 14001-04 framework to identify its significant environmental aspects and review its objectives and targets on a quarterly basis as per Procedure 3.12;
- SJE commits, as a member of the Canadian Electricity Association, to the principles and requirements defined in its Sustainable Electricity Program;
- SJE will continue to monitor, measure and report its status and progress on meeting the eleven utility environmental indicators as required by the Canadian Electricity Association;
- SJE will conduct its operations to respect the principles of pollution prevention, with the application of environmental risk assessment and management, and with respect to life-cycle management of hazardous materials;
- SJE will seek to continually improve its environmental performance with internal and external audits, and will report its performance to the Board of Commissioners no less than two times per year and to the public at least once per year.
- SJE will make its environmental policy available to its employees and customers. The policy will be revised as operations and activities evolve.

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### **3.0 PLANNING**

The following sections outline the environmental aspects (issues) associated with the daily activities of the utility and applicable legislation to which the utility must adhere. Following identification of the environmental aspects and legal requirements, a series of objectives and targets are defined to ensure that SJE meets the corporate policy goals as well as legal and environmental requirements.

#### **3.1 Environmental Aspects**

Under ISO 14001, environmental aspects are defined as "*...an element of an organization's activities, products or services that can interact with the environment.*" Saint John Energy's EMS addresses the aspects of the utility's operations that could potentially impact air, water, land and/ or social systems.

There are several components that make up SJE's operations and daily activities, not all of which have environmental concerns associated with them. Activities include, but are not limited to, the following: building maintenance (including grounds keeping), administration activities (paper use, toner cartridge replacement, etc.), purchasing, fleet management, and various field activities. Following discussions with representatives of the administration, engineering and operations departments and the Safety, Training and Environment Coordinator, environmental aspects of concern were identified as those which may adversely impact air, water or terrestrial resources. These are identified using Procedure 3.0 Identification of Aspects and summarized in Table 3.1.

Criteria used to evaluate the significance of potential impacts associated with each of the aspects includes consideration of the following:

- scale of potential impact;
- severity of potential impact;
- probability of occurrence;
- duration of potential impact;
- potential regulatory and legal exposure;
- difficulty to change impact;
- cost to change impact;

January 2001 Revision 2

- effect of change on other activities and processes;
- concerns of interested parties; and
- effects on public image.

For each aspect, the above criteria were scored 0 to 3 (0 = low, 3 = high) for a maximum total score of 30 for each aspect. The totals were then used to categorize the overall impact as low (total less than 16) or high (total greater than or equal to 16). (See Appendix A for a tabulation of the significance of the potential environmental impacts). Objectives and targets were then developed (Tables 3.2 and 3.3) for those aspects ranked as "high".

### **Procedure #3.0 Identification of Aspects**

1. SJE will develop and evaluate its aspects based on a review of its operation that could potentially impact air, water, land and/or social systems as outlined in 3.1 Environmental Aspects.
2. SJE commits to a yearly review of its aspects. New or modified activities, operations, products and/or services will require an aspect review prior to implementation.
3. New aspects will be developed or existing ones modified with the consultation of the affected departments.
4. All environmental aspects will be reviewed and grouped into categories for ease of handling and review. Categorized aspects will be listed in Appendix A: Suspected Environmental Aspects Table.
5. Grouped aspects will be evaluated to determine the significance of the potential environmental impacts using the evaluation form in Appendix A: SJE Environmental Aspects Evaluation Form.
6. Evaluation results will be identified and summarized in Table 3.1 Identification of Environmental Aspects.
7. Significant Aspects will be addressed through objectives and targets as per 3.3 Objectives and Targets.

Responsibility: HSE Coordinator

Schedule: The review will be yearly or sooner if new or modified activities occur.

December 2000 Revision 1

<b>Table 3.1                      Identification of Environmental Aspects -June 2013 Revision 8</b>			
<b>Activity/Product/Service</b>	<b>Environmental Aspects,                      Legal &amp; Other Requirements                      Associated with the                      Activity/Product/Service</b>	<b>Potential                      Environmental                      Impacts</b>	<b>Significance                      of Impact</b>
<b>Waste Management</b>			
<ul style="list-style-type: none"> <li>• general office and administration activities</li> </ul>	<ul style="list-style-type: none"> <li>• solid waste generation</li> </ul>	<ul style="list-style-type: none"> <li>• consumption of space at landfill</li> <li>• recycling</li> </ul>	H L
<ul style="list-style-type: none"> <li>• replacement of broken or phased-out products in the field</li> </ul>	<ul style="list-style-type: none"> <li>• hazardous waste generation</li> </ul>	<ul style="list-style-type: none"> <li>• consumption of space at landfill</li> <li>• contaminated material, soil and water</li> </ul>	H
<ul style="list-style-type: none"> <li>• product purchase</li> </ul>	<ul style="list-style-type: none"> <li>• use of non-sustainable, environmentally unfriendly products</li> </ul>	<ul style="list-style-type: none"> <li>• potential contamination to water and soil</li> <li>• consumption of space at landfill</li> </ul>	H
<b>Air Emissions</b>			
<ul style="list-style-type: none"> <li>• vehicles</li> </ul>	<ul style="list-style-type: none"> <li>• exhaust, fugitive dust</li> </ul>	<ul style="list-style-type: none"> <li>• ozone depletion</li> <li>• nuisance issue</li> </ul>	H
<ul style="list-style-type: none"> <li>• painting, cleaning</li> </ul>	<ul style="list-style-type: none"> <li>• fumes</li> </ul>	<ul style="list-style-type: none"> <li>• nuisance issue</li> </ul>	L
<ul style="list-style-type: none"> <li>• HVAC system</li> </ul>	<ul style="list-style-type: none"> <li>• Malfunctioning system</li> </ul>	<ul style="list-style-type: none"> <li>• poor air quality</li> </ul>	L
<b>Release to Water</b>			
<ul style="list-style-type: none"> <li>• storm and surface water</li> </ul>	<ul style="list-style-type: none"> <li>• potential discharge of hazardous materials</li> </ul>	<ul style="list-style-type: none"> <li>• water contamination</li> </ul>	H
<ul style="list-style-type: none"> <li>• pesticide use</li> </ul>	<ul style="list-style-type: none"> <li>• potential discharge of hazardous materials</li> </ul>	<ul style="list-style-type: none"> <li>• water contamination</li> </ul>	H
<ul style="list-style-type: none"> <li>• chemical or fuel spills</li> </ul>	<ul style="list-style-type: none"> <li>• potential discharge of hazardous materials</li> </ul>	<ul style="list-style-type: none"> <li>• water contamination</li> </ul>	H
<ul style="list-style-type: none"> <li>• pole replacement</li> </ul>	<ul style="list-style-type: none"> <li>• sensitive area-WAWA</li> </ul>	<ul style="list-style-type: none"> <li>• contamination</li> </ul>	L

<b>Table 3.1                      Identification of Environmental Aspects -June 2013 Revision 8</b>			
<b>Activity/Product/Service</b>	<b>Environmental Aspects,                      Legal &amp; Other Requirements                      Associated with the                      Activity/Product/Service</b>	<b>Potential                      Environmental                      Impacts</b>	<b>Significance                      of Impact</b>
<b>Resource Management</b>			
<ul style="list-style-type: none"> <li>office building</li> </ul>	<ul style="list-style-type: none"> <li>aesthetics, potential discharges, electricity consumption, hazardous materials</li> </ul>	<ul style="list-style-type: none"> <li>nuisance issues</li> <li>aesthetics</li> <li>noise pollution</li> <li>pollution</li> <li>consumption</li> </ul>	H
<ul style="list-style-type: none"> <li>general office activities</li> </ul>	<ul style="list-style-type: none"> <li>paper use</li> </ul>	<ul style="list-style-type: none"> <li>consumption of natural resources</li> </ul>	H
<ul style="list-style-type: none"> <li>operation of vehicles and heavy equipment</li> </ul>	<ul style="list-style-type: none"> <li>consumption of diesel/gas</li> </ul>	<ul style="list-style-type: none"> <li>reduction of raw materials</li> <li>ozone depletion</li> </ul>	L
<ul style="list-style-type: none"> <li>SCADA/load management</li> </ul>	<ul style="list-style-type: none"> <li>consumption of electricity</li> </ul>	<ul style="list-style-type: none"> <li>consumption of natural resources</li> </ul>	L
<ul style="list-style-type: none"> <li>electricity – customer energy efficiency , lighting for streets and Christmas decorations</li> </ul>	<ul style="list-style-type: none"> <li>consumption of electricity</li> </ul>	<ul style="list-style-type: none"> <li>consumption of natural resources</li> </ul>	H
<b>Hazardous Materials</b>			
<ul style="list-style-type: none"> <li>use of PCB-containing materials</li> </ul>	<ul style="list-style-type: none"> <li>potential discharge of hazardous materials</li> </ul>	<ul style="list-style-type: none"> <li>water, soil, human contamination</li> </ul>	H
<ul style="list-style-type: none"> <li>use of mercury-containing materials</li> </ul>	<ul style="list-style-type: none"> <li>potential discharge of hazardous materials</li> </ul>	<ul style="list-style-type: none"> <li>water, soil, human contamination</li> </ul>	H
<ul style="list-style-type: none"> <li>Asbestos</li> </ul>	<ul style="list-style-type: none"> <li>Potential discharge</li> </ul>	<ul style="list-style-type: none"> <li>air contamination</li> </ul>	L
<b>Land Management</b>			
<ul style="list-style-type: none"> <li>contaminated / potentially contaminated sites / substations/transformers</li> </ul>	<ul style="list-style-type: none"> <li>potential discharge of hazardous materials</li> <li>decommissioning sites</li> </ul>	<ul style="list-style-type: none"> <li>water, soil contamination</li> </ul>	H
<ul style="list-style-type: none"> <li>flora/fauna</li> </ul>	<ul style="list-style-type: none"> <li>species at risk</li> </ul>	<ul style="list-style-type: none"> <li>species at risk</li> </ul>	L
<ul style="list-style-type: none"> <li>tree trimming-contractor</li> </ul>	<ul style="list-style-type: none"> <li>sensitive area-WAWA</li> </ul>	<ul style="list-style-type: none"> <li>sensitive area</li> </ul>	L
<ul style="list-style-type: none"> <li>substations</li> </ul>	<ul style="list-style-type: none"> <li>noise and visibility (aesthetics)</li> </ul>	<ul style="list-style-type: none"> <li>noise pollution</li> <li>nuisance issue</li> <li>aesthetics</li> </ul>	L

Activities conducted at SJE that were determined to have potentially adverse environmental impacts associated with them include activities associated with:

- 1) Waste Management;
- 2) Building Management;
- 3) Hazardous Materials Management;
- 4) Materials/Product Management; and
- 5) Pesticide Usage.

The key environmental aspects associated with these activities and for which procedures are detailed in Section 3.4 include:

- 1) solid waste generation (any product that cannot be recycled or used as feedstock for another process);
- 2) hazardous waste generation/handling/accidental discharge;
- 3) use of unsustainable / non-green products;
- 4) generation of exhaust, fugitive dust, noxious fumes; and
- 5) resource consumption.

October 2000 Revision 2

### **3.2 Legal & Other Requirements**

The specific action items dictated in the legislation and other requirements have not been fully identified in this revision but have been allocated as procedure 3.2 Regulatory Compliance under the responsibility of the HSE Coordinator. Internal regulatory and other compliance audits are conducted yearly. Legislative update sources for SJE are the monthly Royal Gazette and the monthly Environment, Health & Safety Reporter from Templegate. Regulatory changes are communicated to affected employees by transmittal slip or email.



### 3.2.1 Legal Requirements

Saint John Energy operates within the boundaries of the City of Saint John, within the Province of New Brunswick. The EMS will therefore address the applicable municipal, provincial and federal environmental legislation.

#### Legal and Other Requirements

##### Canada-Federal

1. Canada Wildlife Act, RSC 1985, c W-9
  - a. (no regs)
2. Canadian Environmental Protection Act, 1999, SC 1999, c 33
  - a. Environmental Emergency Regulation SOR/2003-307
  - b. Ozone - Depleting Substances Regulation, 1998, SOR/99-7
  - c. PCB Regulation SOR/2008-273
  - d. Release and Environmental Emergency Notification Regulation SOR/2011-90
3. Transportation of Dangerous Goods Act, 1992, SC 1992, c 34
  - a. TDG Reg, SOR/2001-286
  - b. TDG Reg, SOR/2008-34

##### Provincial-New Brunswick

4. Clean Environment Act, RSNB, 1973, c C-6
  - a. Environmental Impact Assessment Regulation, NB Reg 87-83
  - b. Petroleum Product Storage and Handling Regulations, NB Reg 87-97
  - c. Used Oil Regulation, NB Reg 2002-19
  - d. Water Quality Regulation, NB Reg 82-126
5. Clean Water Act, SNB 1989, c C-6.1
  - a. Watercourse and Wetland Alteration Regulation, NB Reg 90-80
  - b. Watershed Protected Area Designation Order, NB Reg 2001-83
6. Electricity Act, SNB 2013, c 7
  - a. Electricity from Renewable Resources, NB Reg 2013-65
7. Endangered Species Act, SNB 1996, c E-9.101
  - a. Endangered Species Regulation, NB Reg 96-26
8. Municipalities Act, RSNB 1973, c M-22
9. New Brunswick Building Code Act, SNB 2009, c N-3.5
10. Occupational Health and Safety Act, SNB 1983, c O-0.2
  - a. Administration Regulation, NB Reg 84-26
  - b. Code of Practice for Working Alone Regulation, NB Reg 92-133
  - c. Code of Practice for Working with Material Containing Asbestos Regulation, NB Reg 92-106
  - d. First Aid Regulation, NB Reg 2004-130

- e. General Regulation, NB Reg 91-191
- f. Training and Designated Trades Regulation, NB Reg 2007-33
- g. Workplace Hazardous Materials Information System Regulation,
  - i. NB Reg 88-221
- 11. Pesticide Control Act, RSNB 2011, c 203
  - a. General Regulation (Pesticide), NB Reg 96-126
- 12. Protected Natural Areas Act, SNB 2003, c P-19.01
  - a. Establishment of Protected Natural Areas Regulation, NB Reg 2003-8
- 13. Species at Risk, SNB 2012, c 6
  - a. List of Species at Risk Regulation, NB Reg 2013-38
- 14. Transportation of Dangerous Goods Act, RSNB 2011, c 232
  - a. General Regulation (TDG), NB Reg 89-67

### 3.2.2 Other Requirements

Other requirements include the following:

- 15. CEA Sustainable Electricity Program (SEP) -refer to Procedure 3.4 for requirements
- 16. Fire Code-inspections by Saint John Fire Department
- 17. Insurance Requirements-inspection by BI&I for Frank Cowan Insurance
- 18. Crane Mountain Landfill Requirements-refer to Procedure 4.7 Solid Waste Management
- 19. Certificate of Authorization for PCB Storage and Handling-inspection by NBDOE
- 20. Temporary Environmental Permits for Term Projects-inspections by NBDOE

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### 3.3 Objectives and Targets

The objectives and targets identified in Tables 3.2 and 3.3 are derived from the requirements of the Policy statement and the Environmental Aspects defined in Sections 2, and 3.1. The objectives and targets are designed to provide specific action items which, when implemented, will result in each of the action items being reflected in the Commission's means of operation. The targets show, where feasible, a measurable means of determining performance and thus the achievement of improvement. To achieve some of the objectives and targets, SJE will consider the use of the best available technology or best available product/material where practical.

Objectives and targets should be reviewed periodically and revised to reflect changes in circumstances or recommendations from periodic audits of the EMS. This, in effect, provides the means by which continued improvement will be achieved.

January 2001 Revision 3

<b>Table 3.2 2015 Objectives and Targets from the Policy Statement</b>			
<b>Area of Responsibility</b>	<b>Objective</b>	<b>Target</b>	<b>Operational Controls and Procedure(s)</b>
Policy Commitments	Achieve policy goals.	President & CEO will review all planned activities identified in the Board approved 2015 budget/plan to ensure they are consistent with goals of the environmental policy by February 1, 2015.	3.1
Regulatory Compliance	Meet or exceed all regulatory requirements for activities associated with SJE.	HSE Coordinator will review current municipal, provincial, and federal environmental legal and other requirements and verify SJE is in compliance by June 1, 2015.	3.2
ISO 14001 Compatibility	Maintain an EMS compatible with ISO 14001 standard.	Board will review and accept Environmental Policy with or without changes by February 15, 2015.	3.3
Canadian Electricity Association (CEA)	Meet requirements of CEA's Sustainable Electricity Program (SEP).	VP Engineering & Operations will review SEP to identify all distribution utility benchmarks and verify that SJE is tracking/benchmarking to the appropriate benchmarks by March 15, 2015.	3.4
Pollution Prevention	Continue to develop pollution prevention / environmental improvement plans.	VP Finance & Administration will have the Efficiency/Marketing group prepare a marketing plan to promote electricity consumption reduction for 2015 by March 31, 2015.	3.5
Continual Improvement	Determine ongoing performance of EMS.	JHSC will conduct four quarterly internal environmental audits prior to the last day of each quarter.	3.6

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<b>Table 3.3 2015 Objectives and Targets from the Environmental Aspects</b>			
<b>Environmental Aspect</b>	<b>Objective</b>	<b>Target</b>	<b>Controls/ Procedures</b>
Solid Waste Management	Minimise non-hazardous material disposal, incorporating three R's (1. Reduce, 2. Reuse and 3. Recycle) where applicable.	Purchasing Supervisor to perform two formal work observations to verify that only appropriate waste is sent for disposal at Crane Mountain as per the Landfill Approved Items List by September 1, 2015.	4.7
Hazardous waste generation / handling / accidental discharge.	Phase out use of PCB containing materials as per legislation and industry standards. Minimize release of hazardous materials to the environment ( oil, fluids)	VP Engineering & Operations to have all remaining 630 unverified pole mount transformers tested for PCB contamination by December 1, 2015.	4.8
Use of unsustainable or non-green products or materials	Reduction in use of non-green products from the MSDS inventory. Select non-hazardous products through evaluation process when feasible.	Standards Committee shall review the MSDS hazardous materials list to substitute at least one green product by September 1, 2015.	3.7
Generation of exhaust, fugitive dust or noxious fumes	Ensure environmentally acceptable and sustainable working environment.	Fleet, Insurance & Building Coordinator shall ensure HVAC and vehicles meet optimum operating and maintenance standards by October 1, 2015.	4.9
Resource consumption (Including New Office Building)	Ensure that recyclable materials or feedstock materials are not being landfilled.  Minimize impact of electrical energy supply.  Manage an energy efficient modern office building.	Green Team to continue organic material separation and recycling trial for 2015.  VP Engineering & Operations to continue investigating load control through Power Shift Project and give status report by September 15, 2015.  Manager Shared Services to present a plan to reduce consumption from the 2014 baseline by April 15, 2014.	4.10

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### **3.4 Environmental Management Program**

The environmental management program component of the EMS provides the framework for SJE and its employees to follow to achieve the objectives and targets outlined in Section 3.3. The environmental management programs or procedures are subject to change as targets are achieved and new objectives are set. In addition to providing a road map for achievement of the targets, the procedures also identify line responsibility and assign accountability within SJE for the success of the EMS.

The following Sections describe procedures derived from the Policy statement and the Environmental Aspects with respect to achieving and maintaining ISO 14001 registration.

#### **3.4.1 Procedures for Achieving Objectives and Targets Developed from the Policy**

##### **Procedure 3.1 Achievement of Policy Goals**

1. The activities, products and services provided by SJE will be reviewed to ensure that they are consistent with the goals of the environmental policy.

Responsibility: Board of Commissioners and President in consultation with the  
HSE Coordinator

Schedule: The review will be conducted on an annual basis. April 2000 Revision 1

##### **Procedure 3.2 Regulatory and Other Requirements Compliance**

1. Legislation and requirements outlined in Section 3.2 will be reviewed to identify sections applicable to SJE activities.
2. Employees whose duties are impacted by legislation and requirements will be trained as per procedure on a 3 year annual basis and or when major changes to legislation occur.
3. Unforeseen incidents that result in a non-compliance with respect to legislation and requirements will be mitigated immediately to bring the situation into compliance. Regulatory agencies will be advised of the non-compliance as per the applicable legislation

4. Regulatory and requirement compliance audits will be conducted every three years or when changes occur.
5. Regulatory and requirement compliance audits will be recorded using the Audit Checklist, Summary Report Form, Crane Mountain Compliance Checklist and PCB Compliance Checklist in Appendix C. A number of other legislation specific checklists are also used internally.

Responsibility: HSE Coordinator.

Schedule: Review of legislation will be yearly or when changes occur and internal regulatory audits will be done on a three year basis.

June 2013 Revision 7

### **Procedure 3.3 Maintain an EMS Compatible with ISO 14001**

- 1 The Board of Commissioners will adopt the revised Environmental Policy statement described in Section 2.0 of this manual.
2. The Board of Commissioners will review and adopt new and modified procedures contained within this EMS as revisions for subsequent implementation at SJE.

Responsibility: Board of Commissioners.

Schedule: Both items will be adopted within 30 days of receipt of the revised EMS Implementation Manual.

January 2001 Revision 2

### **Procedure 3.4 Meeting Requirements of CEA Sustainable Electricity SEP Program**

1. SJE will meet the benchmarks set by the CEA.
2. The report summarizing the results of the measures and indicators will be filed in an annual report to the CEA.

Responsibility: VP of Engineering and Operations.

Schedule: Ongoing.

Sept 2009 Revision 2

**Procedure 3.5          Development of Pollution Prevention / Environmental Improvement Plans**

1. Pollution prevention strategies will be developed through the identification of opportunities to avoid, reduce and/or control pollution-causing activities associated with SJE daily operations.
2. Risk management procedures will be developed for those activities that are identified as posing a potential environmental risk. Activities that may pose a risk will be determined based on the probability of occurrence and potential consequences.
3. Potential health hazards and adverse environmental effects will be identified for hazardous materials/products that must be used by employees of SJE. The identification will be done through a life-cycle analysis of the hazardous materials/products.
4. Customer electrical energy efficiency and electricity consumption reduction strategies will be developed through the identification of opportunities to positively impact customers use of electricity to ensure they are using the product in the most efficient manner.

Responsibility:          (1, 2 &3) Executive Managers, Managers, Supervisors, Foremen and Standards Committee. (4) VP Finance & Administration and Efficiency Group.

Schedule:                At the meeting of the Tools and Materials Committee every second month or as required. Efficiency Group meets with the same schedule.

June 2013 Revision 4

**Procedure 3.6          Continual Improvement**

1. SJE will audit the performance of the EMS through the internal and external audit process.
2. Non-compliance issues will be addressed through corrective and preventative action Procedure 5.2.
3. Aspects will be developed, evaluated and reviewed using the process as identified in Procedure 3.0 Identification of Aspects.

Responsibility:          Safety Committee and External Auditor.

Schedule:                Internal audits will be conducted on a quarterly basis and external audits will be conducted every two years or as scheduled by the Registrar.

January 2001 Revision 2

### 3.4.2 Procedures for Achieving Objectives and Targets for Significant Environmental Aspects

Targets for the significant environmental aspects are presented in Table 3.3. The procedures evolving from those objectives and targets are present in this Section.

#### **Procedure 3.7 Use of Unsustainable Products/Materials**

1. Saint John Energy will continue to review new products and materials on a life-cycle basis prior to approving them for use as part of daily operations.
2. Non-green products (materials that may cause negative or adverse impacts on the environment) that can be feasibly and effectively substituted with green products (materials that have minimal environmental impacts associated with their use) will be replaced.
3. Saint John Energy will continue to attempt this replacement at the rate of a minimum of one non-green product or material per year.

Responsibility: Standards Committee – (replaced Tools and Materials Committee)

Schedule: Minimum 6 meetings per year to review products and materials.

June 2013 Revision 5

#### **Procedure 3.8 Establishing Objectives and Targets**

1. SJE will develop its objectives and targets based on a review of its environmental policy, legal and other requirements, significant environmental aspects financial and other constraints.
2. SJE commits to quarterly review of its objectives and targets to determine performance of the EMS.
3. New or modified activities, operations, products and/or services to be utilized by SJE will be reviewed prior to implementation to ensure they are consistent with the current environmental policy, legal and other requirements, existing objectives and targets and environmental management programs.



4. New objectives and targets and environmental management programs will be developed, or existing ones modified, as required.
5. Documentation of objectives and targets will be provided as revisions to the EMS Manual.

Responsibility: HSE Coordinator.

Schedule: Quarterly.

October 2000 Revision 2

## **4.0 IMPLEMENTATION AND OPERATION**

This section outlines how SJE will develop the operational capabilities and systems to achieve the goals of the EMS through the implementation of the procedures derived from objectives and targets.

### **4.1 Structure and Responsibility**

The corporate organizational structure for the implementation, review and maintenance of SJE's EMS is shown in Figure 2. The EMS is designed to be integrated with the Company's overall management system. The roles and responsibilities for key individuals with respect to the EMS are outlined below.

The *Chairman and Board of Commissioners (Board)* are the ultimate reporting body for SJE.

The President and CEO (Chief Executive Manager) has the overall responsibility for implementing the environmental policy and subsequent EMS. The President and CEO reports to the Board and is responsible for implementing their directions on all matters including matters related to the EMS as they relate to management and operations. The President and CEO will appoint the *HSE Coordinator* responsible for the day-to-day management of the EMS, including audits, performance reviews, etc.

*Vice President of Finance and Administration* and *Vice President of Engineering and Operations (Executive Managers)* are responsible to the President and CEO for the environmental performance of their divisions and must integrate the requirements of the EMS with the Utility's other management requirements.

The Health, Safety and Environment Coordinator (HSE Coordinator) reports to the Manager of Shared Services and is responsible for all issues and aspects relating to the EMS across the Utility. The HSE Coordinator provides support to the Managers with respect to implementation of the EMS and monitoring of environmental performance in each department to ensure standards are met.

Duties of the HSE Coordinator include:

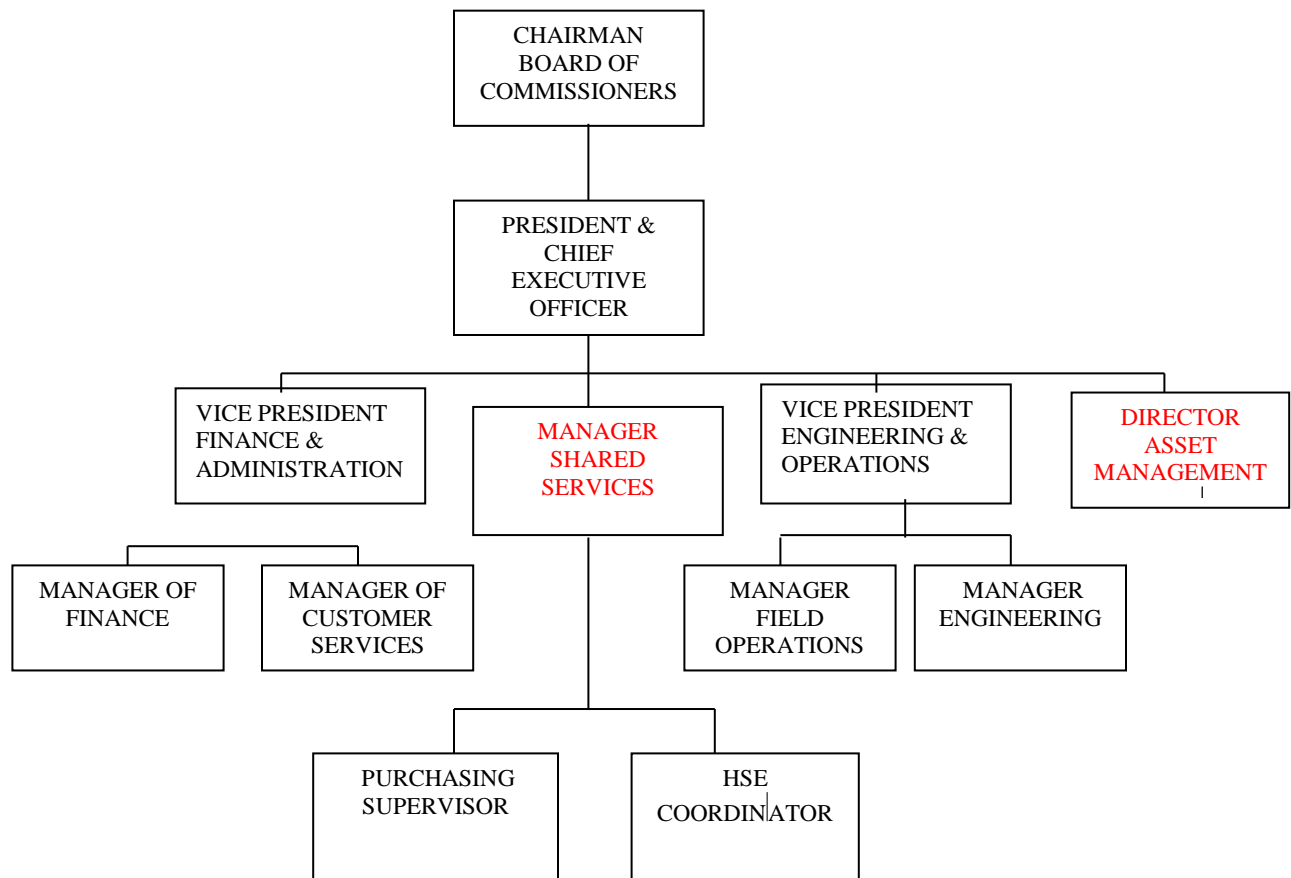
- amalgamation of monthly reports from the Managers on environmental performance into quarterly and annual summary reports for submission to the President and CEO;
- coordination of environmental budgets for training and other environmental performance related activities as necessary and amalgamation for submission to the President and CEO;
- scheduling and implementation of training programs;
- review and prioritization of expenditures to address environmental matters; and
- possession of current knowledge with respect to legislation and industry requirements as they pertain to activities of the utility.

January 2015 Revision 6

Figure 2 - Organization Chart

Saint John Energy-Corporate EMS Reporting Organization Chart

January 2015 Revision 5



## **4.2 Training, Awareness and Competence**

Successful implementation of the EMS requires that employees at all levels are made aware of the existence and purpose of the EMS and their role in the achievement of improved environmental performance.

Personnel training (as applicable to employee responsibilities at SJE) and competency as a result of this training will ensure that the goals of the environmental policy and objectives are achieved.

Various types of training that are required to implement, review and improve the EMS include:

- training of senior management to increase awareness of the strategic importance of environmental management and environmental legislation within the industry and the company;
- training of all employees to increase general environmental awareness regarding daily operations;
- specialty training to enhance the skills of all employees, particularly those whose responsibilities could impact the environment; and
- compliance training for those employees whose responsibilities could affect compliance.

### **Procedure #4.1: Personnel Training and Competence**

1. Training needs can be identified by Employees, Supervisors, Managers, the HSE Coordinator, Tools and Materials Committee, the Safety Committee and communicated to the Executive Managers.
2. Training will be provided using seminars, videos, awareness programs and/or workshops.
3. Training will include the consequences of not following environmental requirements.
4. The HSE Coordinator will review the training needs with respect to requirements and produce an annual training outline to be approved by the President and CEO. The HSE Coordinator will monitor implementation.
5. Individuals receiving training will provide confirmation of successful completion of the training to the HSE Coordinator.
6. Competency will be determined through testing of individuals on their respective training subjects and will take one or more of the following forms: written, oral, practical or on-the-job observation.

7. Results of the testing will be in written form and presented on an individual basis as pass / fail, percent correct or acceptable / unacceptable.
8. Results of testing will be filed in the EMS-related filing system as per Section 4.5.

Responsibility: HSE Coordinator.

Schedule: Every 3 years or as training needs arise. June 2013 Revision 3

#### **Procedure #4.2 Promoting Awareness of the EMS**

1. SJE will promote awareness of the EMS and its function to all employees particularly with respect to the importance of achieving and maintaining the company's registration under ISO 14001. This will be achieved through an information session to raise the awareness and general importance of environmental issues associated with activities and operations carried out at the utility.
2. All employees will be made aware of the progress of the EMS and of areas that require improvement on a regular basis. This will be accomplished through use of newsletters, notice boards, e-mails, etc.

Responsibility: HSE Coordinator

Schedule: Ongoing January 2001 Revision 3

#### **4.3 Communication**

Communication across the utility at all levels of management and operations is essential to the success of the implementation of the EMS. SJE will develop and implement a system for the communication and reporting of information. The system will apply to both internal and external communication. It will also address the results of the EMS monitoring.

Senior Management has chosen to communicate significant environmental aspects to the public through its Website, by opening its facility to the public and through its marketing and communications.

**Procedure #4.3 Internal / External Communication**

1. External communications relating to environmental issues will be managed by the Safety, Training and Environment Coordinator with direction from the President.
2. All incoming and outgoing communications will be signed-off by the Manager receiving the communication and the Safety, Training and Environment Coordinator.
3. Communications will be filed as per Procedure 4.5.
4. Communications specific to a department or addressed to someone other than the Safety, Training and Environment Coordinator will be handled per the addressee and then follow steps 2 and 3 above.
5. Internal environmental issues and concerns will be written on the Safety and Environment Non Conformance Form and submitted to the department Supervisor.
6. The Safety and Environment Non Conformance Form will be submitted to the Safety, Training and Environment Coordinator for review and action.
7. Results of the review will be relayed to the originator if the form has been signed.
8. The completed form, with date of action and action taken, will be filed as per Procedure 4.5.
9. Media/public communications will be handled by the President and CEO or his alternate following consultation with the Safety, Training and Environment Coordinator.
10. The results of the EMS audit will be made available to the public annually by the Safety, Training and Environment Coordinator.

Responsibility: Managers and HSE Coordinator

Schedule: Ongoing

June 2013 Revision 3

#### 4.4 EMS Documentation

The EMS manual describes the environmental policy, legal and other requirements of the management system (core elements). The development of the objectives and targets establishes the relationship among the core elements. Within the procedures contained in the EMS, SJE provides direction and reference to applicable related documentation. The following procedure provides direction for employees of SJE on the application of the EMS Manual. Appendix B lists additional supporting documentation for employees of SJE on the application of the EMS Manual. Appendix B lists additional supporting documentation.

##### **Procedure #4.4 Application of the EMS Manual**

1. Saint John Energy will establish and maintain information in paper and/or electronic format to:
  - i) describe the core elements of the management system and their interaction (EMS Manual); and
  - ii) provide direction to related documentation.
2. The EMS Manual will be reviewed twice a year by the HSE Coordinator.
3. The EMS Manual is to be reviewed by all SJE employees and used for information purposes as well as practical applications.
4. Employees will initial the "sign-off" sheet at the front of their manual and return it to the Safety, Training and Environment Coordinator for filing as per Procedure 4.5 to confirm receipt.
5. Employees shall incorporate revisions to their manuals in a timely fashion following receipt of such from the HSE Coordinator.
6. If the manual is used in electronic format then the HSE Coordinator shall inform the employee of the revisions and make the revisions to the online manual.

Responsibility: HSE Coordinator.

Schedule: Ongoing.

May 2001 Revision 3

## 4.5 Documentation Control

### Procedure #4.5 Document Control

This procedure outlines the requirements for controlling documents, correspondence, etc. pertaining to environmental issues at SJE to ensure successful implementation of the EMS. See Appendix B for the related documentation list.

1. The Safety, Training and Environment Coordinator will establish and maintain a central document control and filing system for all EMS and EMS-related issues.

Material in the files will be catalogued and dated. Relevant issues will include, but not be limited to, the following:

- quarterly reports relating to environmental performance;
- annual summary reports on performance of the EMS;
- training records, schedules and budgets;
- incident and accident reports (including field book summaries, hazard reports);
- internal/external correspondence pertaining to the EMS or environmental matters;
- department-specific documents (i.e. MSDS information, daily building inspection reports); and
- copies of relevant legislation and industry standards/protocols and other applicable requirements.

2. Documentation shall be legible, easily retrieved and protected against damage, deterioration or loss.

3. The HSE Coordinator will establish and maintain the following controls with respect to the EMS Manual:

- each manual will be numbered and the allocation recorded;
- page numbers and revision dates will appear on all pages;
- revisions will be issued within one week of being prepared (with directions for insertion/destruction of old revisions) to ensure the manual remains current;
- revisions will be in red;
- discarded revision pages are to be destroyed;
- requested EMS manual changes will be submitted on the Safety and Environmental



Non-conformance form (Proactive Form) for review by the Environmental Coordinator;  
and

- The electronic online EMS Manual will be available to employees in a read only format with editing control and authority only with the Safety, Training and Environment Coordinator or his designate.

Responsibility: HSE Coordinator

Schedule: Ongoing

June 2013 Revision 6

## 4.6 Operational Control

### Procedure #4.6 Operational Controls

SJE has developed an **Environmental Emergency Response Plan** to control some of the key activities and operations that are associated with significant environmental aspects (i.e., PCB handling and spill response). The plan including emergency spill response as outlined in Procedure 4.6. The plan is incorporated into the Environmental Emergency Response Guide distributed to all Operations employees and the responsibility of the Safety, Training and Environment Coordinator.

SJE has a process by which it monitors potential site impacts. These impacts could be a result of activities on neighboring properties impacting the SJE site or activities conducted by SJE impacting neighboring sites. This monitoring is done as part of the **building, substation yard, substation maintenance and transformer inspection programs** (See inspection forms in Appendix C). Building inspections are conducted monthly by building maintenance employees. Substation yard inspections and transformer inspections are conducted yearly by substation maintenance employees and linemen respectively.

SJE has a **Workplace Hazardous Materials Information System (WHMIS)** to identify and control hazardous materials in the workplace. The WHMIS manual contains a master list of hazardous materials, material safety data sheets (MSDS) on all identified hazardous materials and a temporary product trial section. The four manuals are placed in Engineering, Operations, Purchasing and

Stores Departments and are reviewed yearly. Training is on a three year basis or as training evaluations dictate. Compliance audits are conducted yearly. March 2003 Revision 3

SJE has a comprehensive **vehicle inspection and maintenance program** to ensure vehicles are working in a safe and efficient manner. The program is through the Supply and Services Department and all maintenance is contracted out.

**Subcontractors** are made aware of Saint John Energy's environmental policy and EMS program requirements through the contracting-out/tendering process of the Purchasing Department. Applicable contracts specify that the contractors work must comply with SJE policy and specified requirements including proof of training. The Purchasing Department currently uses a Contractor Responsibility for Safety and Environment Form and a Contractor Checklist-Evaluation Information Form in Appendix C as part of the contracting process which is renewed every year. Jobs are planned and tracked using the **Job Folder Checklist** in Appendix C. The checklist is used to open the job file, track and monitor progress and finally close the job.

SJE has a **Herbicide/Pesticide Application Program** to control plant growth and pests within its substations. The program is administered through the Purchasing Department and application is performed by a licensed contractor or licensed maintenance staff. Only over-the-counter herbicide and pesticide consumer products are used and all applications are logged. The Environmental Emergency Response Guide is used to address spills.

SJE has developed a **Bird/Species at Risk Standard Operating Procedure (SOP)** to ensure bird safety before filling in bird holes in poles and it is contained in the Standard Operating Procedures (SOP) Manual.

The company will continue to review operating practices (e.g., emergency situations, hazardous material handling and storage) and develop additional procedures to address planned and unplanned operating conditions.

Responsibility: Manager of Operations and HSE Coordinator.

Schedule: Ongoing.

June 2013 Revision 8

**Procedure 4.7      Solid Waste Management**

1. Other than the materials listed in Procedure 4.10, all other materials are landfilled, in particular, treated pole butts.
2. Disposal of solid waste to the Crane Mountain Landfill will be carried out according to the Crane Mountain Landfill Requirements located in the environmental file "Landfill Requirements - Crane Mountain" in the Engineering Department.
3. Employees disposing of solid waste at the landfill will be properly trained and aware of compliance issues. Training will be done according to Procedure 4.1.
4. All loads being transported to the Landfill must be secured to the vehicle and covered with a tarp prior to transport.
5. Weigh slips must be returned to the Purchasing Department for payment and tracking of the total material landfilled by SJE.

Responsibility:      Supervisor of Supply and Services.

Schedule:            Ongoing.

March 2012 Revision 2

**Procedure 4.8      Hazardous Waste Generation/Handling/Accidental Discharge**

1. Transformer oil and accumulated varsol will be recycled by local petroleum recyclers.
2. Solid waste and oils that are contaminated with PCBs will be stored in an approved location and disposed of in a government approved manner.
3. SJE will continue to ensure that restricted chemicals are not used for pesticide purposes. Currently, over-the-counter pesticides and a licensed pesticide/herbicide contractor are used in all areas of pesticide management.

Responsibility:      Supervisor of Supply and Services.

Schedule:            Ongoing.

June 2013 Revision 2



working components such as mixing valves shall be reused in the water heater program.

13. Paint cans are cleaned, labels removed and placed in the "metals" recycling bins for collection by scrap metal dealers (only if no plastic liner in can).
14. The individual responsible shall ensure that materials that can be recycled are recycled according to the above procedure.
15. New office buildings energy efficiency shall be monitored.
16. Environmentally friendly electricity generating alternatives shall be investigated.
17. Environmentally friendly fleet vehicle alternatives shall be investigated.

Responsibility: Supervisor of Purchasing and Manager of Operations.

Schedule: Ongoing.

June 2013 Revision 4

#### **4.7 Emergency Preparedness and Response**

SJE maintains emergency response capabilities to respond within the same reporting shift to any known emergency problem. SJE provides a full spectrum of emergency response services from immediate response and containment to subsequent investigations and final restoration. As part of these capabilities, SJE maintains an on-going relationship with a number of key service providers, including:

- a number of excavation contractors;
- oil pumping contractors;
- analytical laboratories;
- soil disposal facilities; and
- hazardous waste disposal facilities.

SJE will coordinate the activities of the service providers to ensure emergencies are properly addressed.

SJE also maintains a relationship with the provincial regulators in New Brunswick. In many instances, where time is of the essence, SJE will work with the regulators to minimize the impact of

any spill occurrence. Depending on the location, there are a number of agencies which may be contacted. These include the New Brunswick Department of the Environment, Federal Emergency Response, RMCP and local police, Fire Department, Provincial - Emergency Response Contacts, and Occupational Health and Safety Commission

SJE shall review its emergency response procedures on an annual basis or following an accident or emergency situation, to determine the continuing suitability of the plans. Revisions will be made and documented as applicable.

Procedures outlined for emergency response shall be tested periodically (mock-disasters) where practical to ensure success.

May 2001 Revision 2

The following general procedure is to outline activities involved in the event of an emergency response involving a spill.

#### **Procedure #4.11      Emergency Spill Response**

1. Immediately upon notification of a spill incident, SJE will mobilize the necessary resources to make an initial assessment of the situation. Based on information provided and the Environmental Emergency Response Guide, a response plan will be formulated accordingly.
2. Upon arrival at the site, SJE will stay upwind of the spill and assess the situation from a personal and public safety perspective. If in doubt, SJE will not go near the spill but will cordon off the scene and safely attempt to obtain emergency telephone numbers and identify the material spilled.
3. Once the work area has been determined safe to work, SJE will take all reasonable action to stop the spread of spilled materials by blocking drainage ditches and catch basins, digging trenches, creating dykes, and/or spreading an absorbent. Depending on the nature of the accident or spill, different regulatory agencies will be contacted as required.

4. SJE will coordinate the cleanup of spilled material in consultation with the regulatory agencies. This will include:
- assessment of the site conditions and environmental impacts;
  - assessment of the potential for containment and collection;
  - deployment of on-site personnel to contain and clean up spilled material if within their capability;
  - call in spills response contractor if required;
  - arrangement of disposal of contaminated material and cleaning materials;
  - arrangement of confirmation of cleanup;
  - preparation and distribution of a written report on the incident; and
  - take necessary precautions to ensure that the incident does not occur again.

Responsibility:           Manager Field Operations and the HSE Coordinator

Schedule:                 Ongoing

February 2007 Revision 3

## **5.0 CHECKING AND CORRECTIVE ACTION**

The intent of checking and corrective activity is described in the ISO 14001 model (See Figure 1) is to ensure that the performance of the EMS is regularly monitored so that items requiring attention are identified and the appropriate corrective action is put in place. It is by this means that "continual improvement" is achieved in accordance with the ISO 14001 premise.

## **Monitoring and Measurement**

Saint John Energy will monitor its activities in the following areas: energy distribution, field work, fleet maintenance, building maintenance, purchasing and administration. Measuring and monitoring of the company's environmental performance will ensure that the implementation of the EMS and the achievement of the Commission's environmental objectives are being met. Monitoring and measuring will enable the Commission to:

- gauge environmental performance;
- identify areas where corrective action is needed;
- analyze causes of problems; and
- improve performance and increase efficiency.

Calibration of environmental equipment ensures measurement accuracy and precision. Currently the calibration of equipment is contracted out. Chlor-N-Oil PCB oil field test kits come with instructions for use, are a one time use kit and require no on site calibration.

The CEA-Sustainable Electricity Program (SEP) program requires Saint John Energy to monitor and report yearly on eleven environmental indicators following the SEP Reporting Guidelines. The reported information is be audited by the CEA currently on a four year cycle.

Managers are to ensure that targets set by the SEP Program through Objectives and Targets in Tables 3.2 and 3.3 are being met by their departments.

March 2012 Revision 5



## **Procedure # 5.1      Monitoring and Measurement**

1. SJE will monitor its activities in the following areas: energy distribution, field work, fleet vehicles, building maintenance, purchasing and administration.
2. SJE will monitor and measure the following environmental indicators as required under the SEP Program as a member of the Canadian Electric Association: internal energy efficiency, reuse of electrical insulating oil, spills, PCB management, public reporting of environmental performance, response to external input concerning environmental performance and evidence of an effective employee awareness and training program.
3. SJE will gauge its environmental performance by benchmarking its environmental indicator performance to the CEA's most current Utility SEP Summary Report.
4. SJE measures the above-mentioned items as detailed in the CEA Guidelines for the SEP Utility Progress Reports.
5. SJE will monitor its compliance with legal and other requirements as listed in 3.2.1 Legal Requirements and 3.2.2 Other Requirements. The monitoring schedule is addressed in Procedure 3.2 Regulatory Compliance.
6. SJE will complete required annual government and agency monitoring and measurement reports as follows:
  - a) CEA SEP Report due by April 23 annually,
  - b) Env Can HWIN Hazardous Waste Generation/Disposal Registration Report due between Jan 1 and Feb 15 annually,
  - c) Provincial Watercourse and Wetland Permit renewal every 5 years (expires Feb 1, 2017),
  - d) Env NB PCB storage report due by June 10 annually, and
  - e) Env Can online PCB e-registration due by March 31 annually.

Responsibility: Supervisor of Purchasing, Manager of Engineering and the HSE Coordinator

Schedule: Ongoing

June 2013 Revision 5

## 5.2 Nonconformance and Corrective and Preventative Action

The purpose of this procedure is to outline the activities involved in identification and investigation of nonconformances, mitigation of associated impacts and determination of corrective and preventative action.

### **Procedure #5.2 Identifying Nonconformances and Determining Corrective and Preventative Action**

1. All health, safety and environmental concerns or other reported problems are to be recorded on Safety and Environment **Proactive Hazard Report** available throughout the building and returned to a Supervisor.
2. The Supervisor forwards the report to a JHSC Member to verify the corrective action is completed then to the HSE Coordinator so the Non Conformance and Corrective Action can be logged and tracked.
3. The original Safety and Environment Hazard Report and Proactive Hazard Report (Non-conformance / Corrective Action form) and completed reports are filed in the EMS filing system.
4. Incidents of nonconformance will be investigated to:
  - identify the cause of the noncompliance;
  - identify and implement the necessary corrective action;
  - identify controls necessary to avoid repetition; and
  - record required changes to procedures.
5. Corrective and preventative action will commensurate with the magnitude of the problem.

Responsibility: Staff and the HSE Coordinator

Schedule: Ongoing

January 2015 Revision 2

### **5.3 Records**

The maintenance of environmental records as they pertain to the performance of the EMS will form tangible evidence of the success of the implementation of the system.

#### **Procedure #5.3 Records Maintenance**

1. The Safety, Training and Environment Coordinator will ensure that environmental records are maintained in a central file on the following items:
  - training;
  - internal and external audit results;
  - comments/suggestions received with respect to the EMS;
  - instructions from the President and Board of Commissioners; and
  - any other matters related to the performance of the EMS.
2. Records will be maintained as per Section 4.5.
3. Records will be kept in the EMS filing system for a minimum of two years then removed and placed in the designated storage cabinet for a minimum of three additional years.
4. Records removed from storage and not required will be destroyed.

Responsibility: HSE Coordinator

Schedule: Ongoing

January 2001 Revision 2

## **5.4 Environmental Management System Audit**

Internal audits will be conducted by the Safety Committee on a quarterly basis on random activities. External audits will be conducted every two years by a certified external environmental auditor appointed by the Board of Commissioners. Activities audited for either internal or external audits shall be based on the environmental significance of the particular activity and previous audit performance.

The audit process will determine the conformity of the EMS to the systems described in the manual (proper implementation and maintenance) and to the ISO 14001 standard. This will provide management with information on the success of the implementation of the EMS.

### **Procedure #5.4 Conducting Internal Environmental Audits**

1. Portions of the Environmental Management System will be audited quarterly by the Safety Committee established at Saint John Energy. If nonconformances are found, then the particular area will be audited at an increased frequency, determined by the Safety, Training and Environment Coordinator in consultation with the Safety Committee, until performance improves.
2. Internal auditors (Joint Health and Safety Committee Members-JHSC) will receive formal training in the ISO 14001 standards and auditing procedures from a qualified person or organization.
3. The schedule of items to be audited is presented by the Safety, Training and Environment Coordinator to the President a minimum of once per year for approval.
4. Monthly Safety Committee meetings will be held to address which areas are to be audited, when the audit will occur, who will audit each area and what the auditors will be looking for. This information will be documented in the meeting minutes.
5. The Safety Committee will develop Audit Checklists for auditing each different area of the Environmental Management System and attach a sample of the forms in Appendix C. The audits cover policies, procedures, legislation, instructions and evidence of implementation of the EMS.

6. The Safety Committee notifies the Department Supervisors of the audit date and areas being audited. Department Supervisors indicate the contact person(s), as applicable, representing each area to be audited.
7. During the audit, the Audit Checklist will be used to ask questions and record compliance /noncompliance and objective evidence supporting this conclusion.
8. If a nonconformance is found, other similar examples should be investigated to determine if the nonconformance is evidence of a single occurrence or of a systemic quality system problem.
9. After completing the audit, the Safety Committee member will document nonconformances as Corrective Action Requests or as Observation Notes, as outlined in Procedure 5.2.
10. A post audit meeting is held with the Department Supervisor to review results and answer any questions.
11. The Safety Committee member prepares an Internal Audit Summary Report for the HSE Coordinator. The Summary Report identifies the components of the EMS audited and the results.
12. The HSE Coordinator summarizes and reviews the results of internal audits at the next Executive Meeting.
13. Copies of the Internal Audit Summary report and associated documents will be filed in the EMS Quality Files.
14. The HSE Coordinator ensures the Preventive and Corrective Action Requests are followed up in accordance with Procedure 5.2.

Responsibility: Joint Health and Safety Committee and the HSE Coordinator

Schedule: Quarterly internal audits and external audits every two years.

June 2013 Revision 3

## 6.0 MANAGEMENT REVIEW

The Board of Commissioners will review the performance of the EMS on a regular basis (at least once every six months) to ensure its continued suitability, adequacy and effectiveness. On the basis of these reviews, improvements and refinements of the EMS will be authorized, thus providing for the continued improvement of the system as specified in ISO 14001.

### Procedure #6.1 Management Review

1. The results of the internal audits and ongoing environmental summary reports will be consolidated by the HSE Coordinator for submission to Senior Management and to the Board at least once every six months. The review process will include the following eight inputs:
  - a. results from internal audits and compliance with legal and other requirements,
  - b. external communications,
  - c. environmental performance of the organization,
  - d. the extent to which objectives and targets have been met,
  - e. status of corrective and preventive actions,
  - f. follow-up actions from previous management reviews,
  - g. changes in business including regulatory and other requirements and
  - h. recommendations for improvement.
2. The results of the Board's review shall be documented in the minutes of meeting and circulated to members of the Board and the Safety, Training and Environment Coordinator. The Board's review shall include the following two outputs: decisions and actions related to changes in environmental policy, objectives, targets other EMS elements and comment consistency with ongoing commitment to continual improvement.
3. All employees will be made aware of the Board's findings by the Safety, Training and Environment Coordinator through methods outlined in Procedure 4.3.

Responsibility: HSE Coordinator  
Schedule: At least twice a year

April 2005 Revision 3

**APPENDIX A**  
**DETERMINATION OF SIGNIFICANT**  
**ENVIRONMENTAL ASPECTS**

Determination of Impacts of Saint John Energy Environmental Aspects

Activity / Product/ Service	Environmental Aspects	Potential Environmental Impacts	Legal & Other Requirement (Ref to 3.2.1 Legal Requirements)	Evaluation of Impacts											Significance of Impact
				Scale of Impact	Severity of Impact	Probability	Duration of Impact	Regulatory or Legal	Difficulty to Change	Cost to Change Impact	Effect of Change on Other	Concern of Interest	Effect on Public Image		
<b>Waste Management</b>															
office/administration	solid waste generation	consumption of landfill	Other #18	1	2	2	3	3	2	3	1	2	1	20-High	
biowaste/needles	Hazardous waste	landfill	Other #18	1	1	1	1	1	2	1	1	0	1	10-Low	
product replacement	hazardous waste generation	consumption of landfill, contamination of soil, water	Legal #2b, #4d Other #18	2	3	2	3	0	3	3	2	2	2	22-High	
product purchase	use of non-sustainable products	consumption of landfill, contamination of soil, water	Legal #2b, #4d Other #18	2	3	2	3	0	3	3	2	2	2	22-High	
<b>Air Emissions</b>															
vehicles	exhaust, fugitive dust	ozone depletion, nuisance	Legal #2b, #10e	1	2	2	1	0	3	3	3	3	3	21-High	
painting and cleaning	fumes	nuisance (air quality, odour)	Legal #10e	2	2	2	1	0	1	1	1	3	3	15-Low	
HVAC	malfunctioning system	poor air quality	Legal #10e	1	2	1	1	0	1	1	2	3	3	15-Low	
<b>Release to Water</b>															
storm & surface water	potential discharge of hazardous materials	water contamination	Legal #2a, #2d, #4b	2	3	1	2	3	3	3	2	3	3	25-High	
pesticide use	potential discharge of hazardous materials	water contamination	Legal #11a	2	3	1	2	3	3	3	2	3	3	25-High	
chemical or fuel spills	potential discharge of hazardous materials	water contamination	Legal #2a, #2d, #4b	2	3	1	2	3	3	3	2	3	3	25-High	
<b>Resource Management</b>															
operation of vehicles	consumption of energy	reduction of raw materials	Legal #2b												



& heavy equipment		ozone depletion		2	2	1	1	0	2	1	1	1	1	12-Low
Office Building	consumption of electricity	consumption of natural resource	Other #15	2	2	2	1	1	2	3	2	3	2	20-High
SCADA/load management	consumption of electricity	consumption of natural resource	Other #15	1	1	1	1	0	1	2	1	1	2	11-Low
Customer Electricity Consumption Energy Efficiency	consumption of electricity	consumption of natural resource	Other #15	3	3	2	2	2	3	1	1	2	3	22-High
<b>Hazardous Materials</b>														
use of PCB containing materials	potential discharge of hazardous materials	water, soil, human, animal contamination	Legal #2a, #2c, #2d, #5, #14a Other #15, #19	3	3	2	3	3	3	3	2	3	3	28-High
use of mercury, containing materials	potential discharge of hazardous materials	water, soil, human, animal contamination	Legal #2a, #2d,	2	3	1	3	3	3	3	2	3	3	26-High
<b>Land Management</b>														
contaminated/potentially contaminated sites	potential discharge of hazardous materials, decommissioning sites	water, soil contamination	Legal ##2a, #2c, #2d, #3a, #4a Other #19	3	3	2	2	3	3	3	2	3	3	27-High
substations	noise and visibility (aesthetics)	noise pollution and aesthetics	Legal #10e	2	1	1	2	0	2	1	1	2	1	13-Low
flora & fauna	sensitive area	damage	Legal #7a, #12a, #13a,	1	1	0	1	3	2	1	0	2	2	14-Low
pole placement	Sensitive area	Water contamination	Legal #5a-b	2	1	1	1	1	2	2	1	2	1	14-Low

Note: Each issue in the "Evaluation of Impact" is scored from 0 to 3 points, for a total possible score of 30. Aspects are then ranked low (0-15) and high (16-30) significance, based on the total.

Revision 15 Jun 2015

**APPENDIX B**  
**RELATED DOCUMENTATION**

April 2000 Revision 1

The following is a list of supporting documentation located in the EMS Master Filing System in the Engineering Department of Saint John Energy.

- 1 Legal Aspects -summary record and legal documents
- 2 ECR Program and Reports -guideline document and reporting records
- 3 3R-Monitored and Measured -records
- 4 PCB Removal and Disposal Programs -documents and records
- 5 Emergency Response Guide -document and record of review
- 6 Hazardous Waste Forms -documents
- 7 Completed Hazardous Waste Forms -records
- 8 PCB Storage and Reporting Requirements -documentation and approval record
- 9 PCB Storage Log (office copy) -records
- 10 Correspondence -records of internal and external communications
- 11 Oil Decontamination -documents
- 12 PCB Working Guides -documents
- 13 PCB Field Tests -records of Chlor-n-oil and L2000 test results
- 14 PCB Lab Tests -records of laboratory test results
- 15 Commission Monthly Environment Summary Reports -records
- 16 Landfill Requirements -documentation and records
- 17 Environmental Damage / Spill Reports -records
- 18 ISO 14000 Gap Analysis -documents
- 19 ISO 14000 Standards -documents
- 20 ISO 14001 Registration -documents and records
- 21 Environmental Budget and Management Plan -documentation
- 22 PCB/Oil Field Maintenance Process -documents
- 23 Internal and External Audits -records
- 24 Environmental Policies -documents
- 25 Training -records
- 26 ISO 14001 Implementation Manual and Progress Reports -document and records
- 27 Environmental Contractors/Consultants/Resources -documentation
- 28 **Proactive Hazard Reports** (previously called Non Conformance and Corrective Action Reports for Safety and Environment) -document and records

March 2014 Revision 3

**APPENDIX C**  
**FORMS**

The following is a partial list of forms that will be used in the implementation of the EMS:

Daily Work Report.....	May 2002 Revision 2
Daily Maintenance Work Report.....	December 2000 Revision 1
Daily Interior & Exterior Checklist.....	April 2006 Revision 2
Workplace Inspection Recording Form.....	December 2000 Revision 1
Material Evaluation Form.....	June 2007 Revision 2
Material Evaluation Checklist.....	December 2000 Revision 1
Safety and Environment Hazard Report.....	July 2000 Revision 1
Observation Report (Auditing).....	April 2000 Revision 1
<b>Proactive Hazard Report</b> (Non Conformance Auditing).....	January 2014 Revision 3
Audit Checklist (Auditing).....	April 2000 Revision 1
Summary Report Short Form (Auditing).....	March 2004 Revision 1
Summary Report Form (Auditing).....	April 2000 Revision 1
Crane Mountain Compliance Checklist (Auditing).....	December 2000 Revision 1
PCB Storage Compliance Checklist (Auditing).....	December 2000 Revision 1
Job Folder Checklist.....	February 2003 Revision 1
Contractor Evaluation Checklist.....	April 2007 Revision 3





## DAILY INTERIOR & EXTERIOR CHECK LIST

(GUIDELINE)

DATE: \_\_\_\_\_

INSPECTED BY: \_\_\_\_\_

	OK	REQUIRES ACTION
1. Check parking lots and driveways for Weeds, debris, leaves, snow, glass, paper etc. and that fences are in good repair		
- Lot off Queen Street	_____	_____
- Back lot off Charlotte Street (Employee's entrance)	_____	_____
- Stores area lot	_____	_____
2. Check entrances, exits and front sidewalk. Must be free of dirt, debris, snow and ice.		
- Front customer entrance	_____	_____
- Side exit	_____	_____
- Employee's entrance	_____	_____
- All overhead doors and man doors	_____	_____
- Refuse containers and butt cans	_____	_____
3. Check outdoor lights.	_____	_____
4. Interior-work area, floors and walls.		
- Protrusion of any kind	_____	_____
- Cracks or holes	_____	_____
- Spills-oil, water and grease	_____	_____
- Tires	_____	_____
- Hydraulic fluid pan and drum	_____	_____
5. Check interior lights.	_____	_____
6. Check recycle bottle container in 2 <sup>nd</sup> floor lunchroom.	_____	_____
7. Check penthouse.		
- Equipment (condenser, cooling tower, etc.)	_____	_____
- Structure, pipes, trays, etc.	_____	_____
8. Other: _____		





ISO 14001 Implementation Manual

WORKPLACE INSPECTION RECORDING FORM

ITEM, LOCATION AND DESCRIPTION	REPEAT ITEM		RECOMMENDED ACTION	ACTION TAKEN	DATE
	YES	NO			

December 2000 Revision 1

DATE: \_\_\_\_\_

**MATERIAL EVALUATION**  
July 2007, Revision 3

**EVALUATING TEST NUMBER**

**DATE INSTALLED:** \_\_\_\_\_

**STOCK CODE NUMBER**

**LOCATION:** \_\_\_\_\_

**MANUFACTURER AND DESCRIPTION**

**GOOD FEATURES**

**POOR FEATURES**

GOOD FEATURES	POOR FEATURES

**OVERALL INSPRESSIONS (COMMENTS)**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**SUBMITTED BY:** \_\_\_\_\_

**APPROVED:**

**NOT APPROVED:**

**DATE REVIEWED** \_\_\_\_\_

**APPROVED BY:** \_\_\_\_\_

**DEPARTMENT:** \_\_\_\_\_

**Material Evaluation Checklist**

(Summary)

TEST CODE	HYDRO CODE	DESCRIPTION	RESULT
TST001	HOL002	WIRE HOLDER	NO
TST002		FIBERGLASS FOLDING RULE	OK
TST003	ISU026	POLYMER SPREADER BRACKET INSULATOR	OK
TST004	ADP030	#2 DRAIN WIRE GROUND	
TST005	REL001	PRINETICS STREET LIGHTING RELAY	OK
TST006	POL819	PAINT FOR CAST IRON POLES	NO
TST007	GLOVES	STERLING GLOVES (KLONDIKE)	NO
TST008		RAINSUITS-MSA	OK
TST009		RAINSUITS-HELLY HANSEN	OK
TST010		HAND LANTERN	OK
TST011	ISU026	SPREADER BRACKET INSULATOR (AESCO)	NO
TST012	KIT012	WEATHERPROOF FUSE CONNECTION KITS	OK
TST013	BAL008	BALLAST-FOR DECORATIVE FIXTURES	OK
TST014	LUM012	150 WATT POST TOP LANTERN(CARRIAGE STYLE)	OK
TST015	LUM014	150 WATT POST TOP LUMINAIRE	NO
TST016		GLOVE LINNERS-(GANT)	OK
TST017	WIR006	12/2 STREET LIGHT WIRE	OK
TST018	SLI022	INSULATED SERVICE SLEEVES #2-#2 ACSR	OK
TST019	SLI024	INSULATED SERVICE SLEEVES #2-#4 ACSR	OK
TST020	SLI044	INSULATED SERVICE SLEEVES #4-#4 ACSR	OK
TST021	PIN002	CROSS ARM PIN	OK
TST022	HOL022	WIRE HOLDER, WITH NUT ON END FOR WRENCH	OK
TST023	BRK012	NEUTRAL BRACKET, FOR USE WITH 4/0 CABLE	OK
TST024	HOL	ENERSCAN WIRE HOLDER WITH BOLT	NO
TST025	GUA006	ENERSCAN WOOD GUARDS FOR POLE GROUNDING	OK
TST026	ISU	SANTANA PORCELAIN INSULATORS	OK
TST027	CON	AMP-PIERCING CONNECTORS	OK
TST028	SLI	AMP-ISULATED SERVICE SLEEVES	OK
TST029	CLA012	CLAMP-WEDGE McLean	
TST030	ISU	EPOLXILATORS-THERMOPLASTICS	NO
TST031	STA002	STARTER FOR HPS LUMINAIRES	OK
TST032	ISU022	INSULATOR-DEAD END 15 KV	OK
TST033	NEW	CLAMPS-ANGLE SUSPENSION	OK
TST034	CLA034	CLAMPS-DEAD END (STRAIGHT & SIDE LOADING)	OK

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TST035		JELCO-POLE CHOKER	OK
TST036		YELLOW PAINT SPRAY	OK
TST037		HELMET COVERS	NO
TST038	REL001	STREET LIGHTING RELAY (EPAC)	OK
TST039	CLA028	McLEAN HOT LINE CLAMPS 336 TO 6 ACSR	OK
TST040	CLA030	McLEAN HOT LINE CLAMPS 400 STR. TO #6 SOLID	OK
TST041	SLT110	HOMAC FULL TENSION SLEEVES 2/0 ACSR	NO
TST042	SLT108	HOMAC FULL TENSION SLEEVES 1/0 ACSR	NO
TST043		HOMAC 2-HOLE COMPRESSION LUG 250 MCM	NO
TST044		HOMAC 2-HOLE COMPRESSION LUG FOR 750 MCM	NO
TST045		BURNDY, BATTERY OPERATED PRESS FOR 750 MCM	OK
TST046		McLEAN RUNNING BLOCK	NO
TST047	TMRO11	3M TERMINATION KITS FOR 750 @ 500 MCM	OK
TST048	TMR011	JOSLYN TERMINATION KITS FOR 750 @ 500 MCM	NO
TST049	NEW	AMP WEDGE CONNECTORS	
TST050		ARKON HELMET AND ADJUSTABLE STRAPS	OK
TST051		RAY-O-VAC FLASH LIGHTS	OK
TST052		FCI CABLE CUTTERS FOR 500 MCM	OK
TST053		FCI CABLE CUTTERS FOR 1000 MCM	OK
TST054	NEW	FCI (BURNDY) WEDGE CONNECTORS	
TST055		RATCHET CABLE CUTTERS	OK
TST056	BLD-BLT	POLTEC GALVANIZED DA AND THRU BOLTS	OK
TST057	HOK002	POLTEC GUY HOOK	OK
TST058	TON002	POLTEC TONGUE	OK
TST059	WASHER	POLTEC GALVANIZED SQUARE WASHERS	OK
TST060	PIN004	POTEC POLE TOP PIN	NO
TST061	ISU012	POLTEC--LORENZETTI INSULATOR	NO
TST062	ISU022	POLTEC SUSPENSION INSULATOR	
TST063	GRI004	POLTEC 5/16 GUY GRIPS	
TST064	LAG	POLTEC LAG SCREWS	OK
TST065	DOLLY	TRANSPORT DOLLY	OK
TST066	*****	EVALUATION OF UNDERGROUND ELBOWS,CON, PLUGS	*****
	*****	TO ALLOW FULL PRODUCT EVALUATION	OK
TST067	GLOVES	BELL CUFF RUBBER GLOVES	OK

**PROACTIVE (HAZARD REPORTING) FORM**  
**For Safety & Environmental Hazard Identification and Corrective Actions**

Revision 4 - 27/01/15

PROACTIVE (HAZARD) REPORTING IS EVERYONE'S BUSINESS. When a safety or environmental hazard is observed you need to see it, fix it and report it. It may involve: People-Equipment-Material-Environment-Building Use this handy form to report your observation and help eliminate hazards. Please submit directly to your supervisor.

Section 1 Employee

**DETAILS OF HAZARD**

Situation (circle): **Unsafe Condition / Unsafe Practice / Environmental Observation**

Risk Level (circle): **Low / Medium / High**

Where: \_\_\_\_\_

When: \_\_\_\_\_

Details: \_\_\_\_\_  
\_\_\_\_\_

Corrective Action Taken: \_\_\_\_\_  
\_\_\_\_\_

Reported by: \_\_\_\_\_ Date: \_\_\_\_\_ (Please use back for more space)

Section 2 Supervisor

**DETAILS OF FURTHER CORRECTIVE ACTION**

Corrective Action – Action to be taken to rectify and prevent recurrence:

\_\_\_\_\_  
\_\_\_\_\_

Name: \_\_\_\_\_ Target Date: \_\_\_\_\_

Position: \_\_\_\_\_ Actual Date: \_\_\_\_\_

(Please use back for more space)

Section 3 JHSC Member

**VERIFICATION**

Verification of the Corrective Action – Acceptance of the Corrective Action/Comments:

\_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Section 4 Safety Officer

**OFFICE USE**

Hazard tracking no: \_\_\_\_\_

Event logged

Filed by: \_\_\_\_\_



**SAINT JOHN ENERGY**

**Observation Report**

Internal Audit #: \_\_\_\_\_

Auditor: \_\_\_\_\_

Date: \_\_\_\_\_

**Documentation of Deficiency by Auditor**

Requirement / Procedure: \_\_\_\_\_  
\_\_\_\_\_

Deficiency (Item, Location, Description): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Verification of Deficiency**

Agree: \_\_\_\_\_

Disagree: \_\_\_\_\_

Previously Identified Item: \_\_\_\_\_

Name of Auditee: \_\_\_\_\_  
(Print)

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Recommended Action**

Accept As-Is: \_\_\_\_\_ Repair: \_\_\_\_\_ Return to Supplier: \_\_\_\_\_ Under Review: \_\_\_\_\_

Date Recommended Action to be Completed By: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Verification of Completion of Recommended Action**

Satisfactory: \_\_\_\_\_ Unsatisfactory: \_\_\_\_\_ Not Corrected Yet: \_\_\_\_\_

Checked By: \_\_\_\_\_ Date: \_\_\_\_\_





**SAINT JOHN ENERGY**  
**Non-Conformance and Corrective Action Form**

Non-Conformance #: \_\_\_\_\_ Date: \_\_\_\_\_

**Observation Report #:** \_\_\_\_\_

**EMS Requirement**  
Requirement / Procedure: \_\_\_\_\_  
\_\_\_\_\_

Deficiency (Item, Location, Description): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Verification of Deficiency**

Agree: \_\_\_\_\_ Disagree: \_\_\_\_\_ Previously Identified Item: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Name of Auditee: \_\_\_\_\_ Signature: \_\_\_\_\_  
Date: \_\_\_\_\_ (Print)

**Recommended Action**

Accept As-Is: \_\_\_\_\_ Repair: \_\_\_\_\_ Return to Supplier: \_\_\_\_\_ Under Review: \_\_\_\_\_

Date Recommended Action to be Completed By: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Verification of Completion of Recommended Action**

Satisfactory: \_\_\_\_\_ Unsatisfactory: \_\_\_\_\_ Not Corrected Yet: \_\_\_\_\_

Checked By: \_\_\_\_\_ Date: \_\_\_\_\_



**SAINT JOHN  
ENERGY  
Audit Checklist**

Auditor: \_\_\_\_\_ Checklist # \_\_\_\_\_ Date: \_\_\_\_\_  
Division Audited: \_\_\_\_\_ Internal Audit # \_\_\_\_\_

EMS Requirement	Items to be Checked	Remarks	Conformance	
			Yes	No



**Internal Audit Form**

**Saint John Energy** Auditor: \_\_\_\_\_ Area Audited: \_\_\_\_\_  
**Summary Report Short Form Auditee:** \_\_\_\_\_ **Date Audited:** \_\_\_\_\_

Non conformances? Yes No (If yes, attach non conformance form)  
Observation Reports? Yes No (If yes, attach non conformance form)  
Audit Satisfactory? Yes No

EMS Requirement

Requirement/Procedure  
\_\_\_\_\_

Deficiencies/Comments  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Audit Verified by: \_\_\_\_\_

Date: \_\_\_\_\_

**SAINT JOHN  
ENERGY  
Summary Report Form**

Non-Conformance #: \_\_\_\_\_ Date: \_\_\_\_\_

**Observation Report #:** \_\_\_\_\_

**EMS Requirement**

Requirement / Procedure: \_\_\_\_\_  
\_\_\_\_\_

Deficiency (Item, Location, Description): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**Verification of Deficiency**

Agree: \_\_\_\_\_ Disagree: \_\_\_\_\_ Previously Identified  
Item: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Name of Auditee: \_\_\_\_\_ Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
(Print)

**Recommended Action**

Accept As-Is: \_\_\_\_\_ Repair: \_\_\_\_\_ Return to Supplier: \_\_\_\_\_ Under  
Review: \_\_\_\_\_

Date Recommended Action to be Completed By: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Verification of Completion of Recommended  
Action**

Satisfactory: \_\_\_\_\_ Unsatisfactory: \_\_\_\_\_ Not Corrected  
Yet: \_\_\_\_\_

Checked By: \_\_\_\_\_ Date: \_\_\_\_\_  
\_\_\_\_\_

**AUDIT CHECKLIST**-Crane Mountain Landfill (CML) requirements  
 for municipal solid waste disposal/recycling.

Requirement	Reference	C	NC	Objective Evidence
Are construction and demolition materials separated from wet garbage going to the cells prior to delivery?	Crane Mountain Landfill (CML) Requirements Cover letter			
Are prohibited hazardous wastes such as contaminated soils sent to an appropriate facility other than CML?	Crane Mountain Landfill (CML) Requirements Cover letter			
Are employees trained and made aware of acceptable and prohibited waste for CML?	Crane Mountain Landfill (CML) Requirements-Pg.21			
Are wastes transported as required? i.e. Loads tarped and secured.	CML-Motor Vehicle Attachment Page			
Are waste receiving and weighing guidelines followed?	CML-Pg.23			
Are waste records kept for tracking purposes?	SJE Purchasing Department			
Are vehicles cleaned/swept after unloading prior to leaving CML?	CML-Motor Vehicle Attachment Page			
Are loads inspected by onsite inspectors?	CML-Cover Page			
Are only certain registered SJE vehicles used to deliver waste to CML?	CML-Pg. 21			
Are scrap metal, white goods and wood/lumber separated out onsite for recycling?	CML-Pg/23			

**AUDIT CHECKLIST-PCB Handling, Environmental Contaminants Act, Transportation of Dangerous Goods, Clean Environment Act and Environmental Emergency Response Guide.**

Requirement	Reference	C	NC	Objective Evidence
Are materials or equipment containing more than 50 mg/kg (50ppm) being treated as a PCB material?	Environmental Response Guide Pg.2			
Are PCB's being used/handled in accordance with the Environmental Contaminants Act?	Environmental Response Guide Pg. 3			
Are PCB's being used/handled in accordance with the Transportation of Dangerous Goods Act?	Environmental Response Guide Pg.3 16-17			
Are PCB's being used/handled in accordance with the Clean Environment Act?	Environmental Response Guide Pg. 3			
Are PCB containing ballasts being handled using chemical resistant gloves?	Environmental Response Guide Pg. 7			
Are absorbent materials (eg. Zorbal) being used to contain oil spills?	Environmental Response Guide Pg. 7			
Are the guidelines for handling PCB's being followed by the workers?	Environmental Response Guide Pg. 8-9			
Are the guidelines for the collection of PCB's being followed by the workers?	Environmental Response Guide Pg. 9-10			
Are the Spill Response procedures being followed in the event of a PCB (or suspected PCB) spill?	Environmental Response Guide Pg. 10-13			
Are the decommissioning procedures for Askarel transformers, contaminated oil and lighting ballasts being followed?	Environmental Response Guide Pg. 13-15			
Are decommissioned Askarel transformers, contaminated oil, and waste solvents from flushing and lighting ballasts being stored according to procedure?	Environmental Response Guide Pg. 18			
Are PCB's being stored according to the Storage Facilities and Standards procedure?	Environmental Response Guide Pg. 19-22			
Is the PCB Storage Site Emergency Procedure Plan being carried out according to the Emergency Procedures Plan?	Environmental Response Guide Pg. 23-25			



**Job Folder Checklist**  
Revised February 12, 2003

**Brief Description:** \_\_\_\_\_

**Required Date:** \_\_\_\_\_

<b><u>Item:</u></b>	<b><u>Initials:</u></b>	<b><u>Date:</u></b>
<b>Job Information Sheet</b>	_____	_____
<b>Project/Job Number Created</b>	_____	_____
<b>WAC Form</b>	_____	_____
<b>Job Estimated</b>	_____	_____
<b>Contribution Letter Sent</b>	_____	_____
<b>PO/Contribution Received</b>	_____	_____
<b>One Line Diagram Update</b>	_____	_____
<b>Detail Notes</b>	_____	_____
<b>Wiring Permit</b>	_____	_____
<b>Survey Drawing</b>	_____	_____
<b>Padmount Required</b>	_____	_____
<b>Special Equipment Required</b>	_____	_____
<b>Metering Required</b>	_____	_____
<b>Minimum Demand</b>	_____	_____
<b>GIS Update</b>	_____	_____
<b>Contract Signed</b>	_____	_____
<b>Job Completed</b>	_____	_____
<b>Special permits (watercourse, Env)</b>	_____	_____
<b>Job Closed</b>	_____	_____

**CONTRACTOR CHECKLIST – EVALUATION INFORMATION**

Contractors Name: \_\_\_\_\_ Date of Report: \_\_\_\_\_

Completed By: \_\_\_\_\_ Contract Specifically For: \_\_\_\_\_  
 (Authorized By)

CHECKLIST ITEM	YES	NO	ATTACHED PROOF
1. The contractor is licensed and registered to perform the work. Provincial license # Registration #			
2. The contractor has the appropriate insurance coverage to protect Saint John Energy from construction site liability. WCB General Liability Ins.			
3. Estimates and contracts are complete and detail exactly what will be built or what work will be performed and the cost.			
4. Contractor Safety & Environmental Liability and Responsibility Contract has been properly completed.			
5. You understand the plans and specifications the contractor gave you.			
6. Job timeline is confirmed. Project to start: Project to end:			
7. You have checked out the contractor's references.			
8. You have seen some work that the contractor has done that is similar to your project.			
9. The contractor has a change management process that is logical and easy to understand.			
10. All contractors are bidding on the exact same specifications.			

Additional: Ask contractor for financing suggestions.

Proof of Bond Coverage for total replacement cost of project

Contractor submitted resume/business history. Legal name, number of years in business, education, training, financial stability, credit standing, previous job references. Call Better Business Bureau.