

Great partnerships begin with chemistry



## E2 Communication Plan

### Canadian Environmental Protection Act Environment Emergencies Regulation, (CEPA E2)

The Government of Canada has updated the Environmental Emergency (E2) regulations requiring that any industrial facility storing specific quantities of regulated substances notify members of the public; who may be impacted by a serious chemical environmental emergency. This notification is to provide awareness of the prevention and safety measures that are in place at our facility. The substances identified are Chlorine (gas) and Hydrochloric Acid. The probability of an incident occurring is low, however Chemtrade is taking advance preparation to ensure your safety.

### Chemtrade is Connections

Chemtrade is committed to doing business in a responsible manner. Emergency management is an integral part of our safe operating practices. Safety is one of Chemtrade's strategic pillars and the most vital component of our culture. We provide employees with extensive and ongoing training in safety protocols. Due to the nature of our business, we are mindful of our commitment to the protection of the environment in our handling, transporting and processing systems. Our commitment to Environmental, Social & Governance principles and to the Responsible Care® ethic further highlights the importance we place on safety and sustainability.

### Safe use of Regulated Substances

The facility manufactures sodium chlorate in solution and crystal form. Hydrogen gas is a by-product of the manufacturing process that is used as a fuel in the boilers for the plant. A chlorine release is the main public health concern at this site. Safety and Environmental protection equipment and procedures are in place to minimize the potential for chlorine and other chemicals being released to the environment. Any condition endangering life, property or the environment may be considered an emergency. Each situation will need to be quickly and individually assessed to determine best practicable strategies and actions.

Chlorine (Cl <sub>2</sub> )	Hydrochloric Acid (HCL)
The Plant receives liquefied chlorine in railcars which is delivered via piping to the plant's vaporizer. Chlorine (gas) is a toxic greenish/ yellow gas with a pungent irritating odour. It is heavier than air so settles in low lying areas. Inhalation and absorption represent the primary entry routes into the body. It is corrosive to the skin and respiratory tract. Exposure to low levels can result in nose, throat and eye irritation. At high levels breathing chlorine gas can cause severe complications.	HCL is delivered by railcar and is used in the plant in liquid form for pH control of the process. HCL is a colourless gas with a pungent, suffocating odour. It is very soluble in water and the aqueous solution is highly corrosive, non-combustible chemical. It is an upper respiratory irritant at low levels and may cause damage to the lower respiratory tract at higher concentrations. It is a poisonous and infectious material that has immediate toxic effects.
The estimated probability of a chemical release impacting off site is less than 0.012 times in 1,000 years.	The estimated probability of a chemical release impacting off site is less than 0.1 times in 1,000 years.



## Prevention

- Preventative maintenance program that includes inspection and testing of storage tanks and associated systems
- Trained emergency response team Brandon Plant Emergency Response Team (ERT) and capable of 24/7 response
- Gas and smoke monitors and alarms are distributed throughout the plant to warn employees and neighbours of unwanted conditions.
- Mutual Aid Partnership with surrounding companies and municipal emergency responders (BEST)
- Real time monitoring of ambient air quality and wind direction
- Process safety management for its and performance are continually monitored
- Continuous, automatic monitoring and alarms – monitored 24 hours by qualified operators
- Member of Chlorine Emergency Program (CHLOREP); Chlorine Institutes' Chlorine Rail Transportation Security Management plan (CI Plan)
- Regularly scheduled ERT exercises with emergency responders
- Operator training programs and procedures

## If an Incident Occurs

In the unlikely event of an environmental emergency outside of the perimeter fence Chemtrade has agreements with local agencies to assist with alerting the community; Brandon Emergency Support Team (BEST). Chemtrade has a plan in place to minimize the potential of injury to people, and to protect the environment and the property of both the plant site and the surrounding community. Communication process to notify public in the event of an emergency will include available information such as:

- Type of incident, location, date, time
- Information and guidance concerning actions that should be taken by the public to reduce potential harm to human health and environment
- Details about any closures or community impacts
- Mitigation efforts and next steps to address the incident

There are several ways in which notification may occur and may include local radio and/or social media communications. Instructions may be issued to evacuate or shelter in place. You are encouraged to follow the direction from local authorities.

While the chance of an uncontrolled release of HCL or CL is remote the emergency response plan for this area is in place to ensure your safety.



### Shelter in Place - Follow BEST (Brandon Emergency Support Team) practices

<ul style="list-style-type: none"> <li>Go indoors (and stay there); until given the all clear</li> </ul>	<ul style="list-style-type: none"> <li>Close all windows and doors (every door inside the building)</li> </ul>
<ul style="list-style-type: none"> <li>Do not sure bathroom or kitchen vents</li> </ul>	<ul style="list-style-type: none"> <li>Do not use fireplaces (close all dampers)</li> </ul>
<ul style="list-style-type: none"> <li>Set thermostat so air conditioners, furnaces and hot water heaters will not come on</li> </ul>	<ul style="list-style-type: none"> <li>Shelter in an inside room away from windows and door is possible</li> </ul>
	<ul style="list-style-type: none"> <li>Stay tuned to, radio or website for further information</li> </ul>
<b>Extra protection considerations</b>	
<ul style="list-style-type: none"> <li>Seal the crack around doorway with wide tape and a rolled up damp towel at floor space</li> </ul>	<ul style="list-style-type: none"> <li>Tape a pieces of plastic over the window to seal it; Be prepared ahead of time by cutting a piece of plastic to window size and storing it, with some tape so that it is readily available.</li> </ul>

### Evacuation

If evacuation is ordered then residents will be contacted by emergency responders. This will be done through telephone alert, local media or emergency personnel. It is important to follow directions of first responders.

- Vacate your home; when advised to do so
- Leave a note for your family saying why you left and where you are
- Make arrangements for your pets
- Follow instruction provided by local authorities

### Recovery

- In the unlikely event that an incident does occur, cleanup will commence as soon as incident investigations are complete and restoration plans made. Before returning the plant back to normal operation, equipment verification will be completed.

### Contact us:

If you have any general questions or inquires please reach out to:

Chemtrade Plant Manager at 2504-725-5313

General inquires at 204-728-3777



Plant Location – 8080 Richmond Ave. E, Brandon MB

