

FOREST RESOURCES BUSINESS UNIT

2009 EMS Objectives & Targets Evaluation Report



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Disclaimer/ Statement of Limitations

This report was prepared exclusively for DMI- PRPD, Forest Resources Business Unit. The scope and accuracy of information, findings and recommendations contained herein is consistent with the level of effort expended and is based on: i) information provided by FRBU personnel; the scope of the operations, activities and aspects inspected or about which information was provided; ii) limited on-site inspection and interviews conducted by the evaluation team.

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Overview of Evaluation

An internal evaluation of PRPD forest operations was conducted on December 29, 2009 to verify whether the inspection monitoring practices was implemented and maintained in a manner consistent with the Field Operations Supervisor Manual as per 2009 Objectives and Targets number 2009-02 and 2008-02.

This audit included all phases of the company's harvesting operations including the construction and operation of a temporary camp site. The audit team consisted of Samuel ELKINS, RFP (AB), PEA, EMS (LA) with Steven KRAHN and Lee RUEB, RFP escorting the auditor to all the sites. ELKINS, a Registered Forest Professional in Alberta and a Provisional Environmental Auditor with the Canadian Environmental Auditing Association was involved with all aspects of the audit including documentation reviews, observations of the activities and interviews where required..

The audit sample included three cut blocks (Blk 203, 226, and 227) operated by Peace River Logging Ltd. within the EP- Whiskey Jack Operating Area, and one temporary campsite also owned and operated by the same contractor.

This report provides information regarding existing strengths and suggestions that can be used to improve the inspection monitoring system. This information will be further discussed within the body of the report.

Evaluation procedures followed the steps outlined in the Field Operations Supervisor Manual. The data collection included a combination of:

- Document review,
- Interviews, and
- Site observations.

Questions or comments regarding the evaluation process or results can be addressed to Samuel ELKINS at (780) 624 – 7448, or by e-mail at selkins@prpddmi.com.

1. Cut Blocks

Existing Strengths:

- Under-story protection of spruce identified during the operational phase was avoided as required in a manner consistent with internal policies.
- Drainage crossings observed were installed as per the DMI crossing standards. Logs exceeded the 2.0 metre allowance on either side of the running surface, brow logs were in place and filter fabric utilized to mitigate the potential of deleterious material entering the watercourse.
- In-block road location changes were made to avoid wet areas and to mitigate the installation of additional drainage crossings.
- Although no running surfaces were measured, roads appeared to be within the 5.0 metre average width requirement as outlined in the Annual Operating Plan.
- External block and internal retention boundary configurations appeared to be intact as per the Detailed Block Plan maps.
- Appears all individuals working within the logging/chipping operations had signed off on the Operations start-up meeting as required by the EMS.

Suggestions for Improvement:

- In- block road locations were made to avoid wet areas and installing additional crossings; however as per FR-G007- Self Reporting Guidelines, all in-block road changes in excess of 40 meters of the planned centreline must be documented on the Operations Monitoring Report and submitted weekly to ASRD.
- Un-merchantable and merchantable spruce stems were left standing as per the DMI retention guidelines however; more poplar stems are required for shelter and to help mitigate the potential of blow – down of the spruce.
- The retention prescriptions on all three Detailed Block Plan Maps were left blank. Having the retention prescriptions on the map as they were intended may mitigate the potential error of referring to the block information tables within the Annual Operating Plan.
- Active grinding operations were reviewed and noted that truck drivers were outside of the truck checking loads without the required PPE as outlined in the FRP- 20- Bush Hog Fuel Loading Procedures within the DMI Truck Safe Manual. Controlling hazards reduces risks, demonstrates

due diligence and a commitment by the company to the health and safety of worker and may in turn prevent an injury.

Continuous Improvement Opportunities:

- Although filter fabric was utilized with the log fill observed in the field, consider putting an additional layer on the drainage itself, prior to installing the logs, to further mitigate deleterious material from entering the channel.
- Although not required to be reported to ASRD in a formal Operations Monitoring Report, consider documenting all minor in-block amendments including road changes. This will serve as due diligence on the companies part, as well be part of the continual improvement loop for the EMS process. It also answers questions before they are asked in the event of an EMS/SMS third – party audit.
- Consider utilizing all wood waste in the grinding process including spruce tops and limbs. Having to return to the cut block post grinding operations with a brush blade for piling tops would be deemed an addition but avoidable expense. Having more fibre available for the grinding operation would mean less equipment moves which would translate into a less per unit cost.

2. Temporary Camp Site

Existing Strengths:

- Permitting requirements for the sump as required by Municipal Affairs was completed prior to the camp being set up and operating as required.
- Fuelling site is located approximately 50 metres from the camp buildings in the event of a fire/explosion.
- Tank was contained within a frozen snow/ice berm and had the required spill response equipment located adjacent to the tank in the event of a petroleum release.
- Site was very tidy and was equipped with a large portable garbage container to ensure the proper disposal of refuse material.
- Secondary containment was noted on 100 % of the nozzles observed.

Suggestions for Improvement:

- An uncertified portable tank was being utilized for gasoline storage had all the proper markings and spill prevention measures in place however the tank had not received an annual certification test as per the requirements outlined in the DMI Fuel Management Field Guide. Having all tanks certified is not only a commitment DMI makes within the Environmental Management System, it also provides due diligence in the event of a release.
- Although fencing has been installed around the sump as required, one corner requires an additional post to hold it upright. Having the fence properly installed may mitigate wildlife or a person, inadvertently falling into the sump.
- Noted PRL foreman pick – up had a tidy tank in the back, but the TDG label was not visible from outside of the box. Labels are required to be visible in the event of an incident emergency workers are cognisant of what they may have to deal with.

Continuous Improvement Opportunities:

- Although employees had an overall awareness to applicable fuel management requirements, specific knowledge could be improved. Consider periodic reviews of the Fuel Management requirements, and reviewing with employees at subsequent operational meetings. This may foster a broader working knowledge of legislative requirements for all employees.



Conclusions

Based on the findings noted, the inspection monitoring system appears to be fully implemented and maintained in a manner consistent with the associated requirements of the Field Operations Supervisor Manual. The evaluation indicates that FRBU value the EMS as a means to assist their business and avoid any potential non – compliance or adverse environmental impacts.

This evaluation has also allowed FRBU to see where the operations may need to focus it attention with the Suggestions for Improvement made, as well, continually improve as a number of Continual Improvement Opportunities was also identified.

All suggestions for improvement require a corrective action plan to reduce any potential adverse impacts or non – compliance issues. Continual improvement opportunities do not require an action plan, but may lead to a suggestion for improvement in subsequent reviews.

Thank you for the opportunity to complete this internal evaluation, and the cooperation provided from staff members during the evaluation process. Please do not hesitate to contact me should you have any questions or concerns.

Regards,

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Continuous Improvement Coordinator

