Limitations on Brush and Woody Debris Burning

**Document Number:** ECS0110A

**Standard – Administrative**

**Applies To:** Regional Wood Buffalo

**Revision Date:** 2016/04/06

**Revision:** 6

**Review Cycle:** 3 Years

**Document Owner (Title):** Director, Regional Environment and Regulatory Compliance

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**Summary of Changes**

<table>
<thead>
<tr>
<th>Rev No.</th>
<th>Section Changed</th>
<th>Revision Made</th>
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</thead>
<tbody>
<tr>
<td>6</td>
<td>Document</td>
<td>Updates include:</td>
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<tr>
<td></td>
<td></td>
<td>1) Suncor Regulatory and Environment organizational changes</td>
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<td>2) Regulatory agency changes</td>
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<td>3) Governance Document Framework requirements</td>
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<td>4) Usability mapping requirements</td>
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<td>5) Regionalizing this standard.</td>
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**Scope**

This standard applies to all activities associated with the burning of brush and woody debris performed by Suncor personnel and contractors in the Wood Buffalo Region.

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**Purpose**

- To minimize the on and offsite health and environmental effects associated with brush/woody debris clearing and burning.
- To ensure that personnel, equipment and materials are protected from open fires.

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**Compliance**

On the date noted on the signature page, compliance to standard is applicable to all personnel and contractors working in the Wood Buffalo Region.

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**Roles and Responsibilities**

The following individuals and groups have the following roles and responsibilities:

**Document Owner**

- Ensures this document is reviewed according to the required revision cycle.
- Ensures the document is updated to accommodate changes to Suncor, provincial, and federal regulation.
- Ensures the document is updated to mitigate risks found as the result of an incident.

**Document Approver**

- Ensures this standard is necessary and that it aligns with management and company direction.

Continued on next page
Roles and Responsibilities Continued

**Emergency Services**
- Inspects burn area before issuing a Burn Authorization.
- Inspects area to ensure total extinguishment of fires before signing off the Burn Authorization.
- Ensures proper regulatory authorization is received prior to issuing a burn authorization.

**Supervisors**
- Ensures that this document is available and implemented when required.

**Document Users**
- Works in compliance with this document.

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**Important Contacts**
The following contacts are important to this standard:

<table>
<thead>
<tr>
<th>Role</th>
<th>Base Plant</th>
<th>Firebag</th>
<th>Fort Hills</th>
<th>MacKay River</th>
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<tbody>
<tr>
<td>Safety</td>
<td></td>
<td>780-713-6844 (Safety)</td>
<td>780-598-4355 (EHS)</td>
<td>780-743-6840 (EHS)</td>
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<td>780-792-5667 (Safety)</td>
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<td>Fire Prevention Group</td>
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<td>780-762-4311 (Fire Prevention)</td>
<td>780-714-6205 (Fire Prevention)</td>
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<td>Suncor Environmental Department</td>
<td>Base Plant</td>
<td>780-370-7114 (Environmental Affairs)</td>
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<td>780-598-4355 (EHS)</td>
<td>780-743-6840 (Environmental Affairs)</td>
<td>780-792-2454 (EHS)</td>
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</table>

**References**
- EPEA Operating Approvals
- LMP0024A Burn Authorization Oil Sands
Terms, Definitions and Acronyms

The following terms, definitions and acronyms are used in this standard:

- **AEP**
  Alberta Environment and Parks

- **CEMA**
  Cumulative Environmental Management Association

- **Clear-cut**
  To log an area by removing all of the trees at one time.

- **EPEA**
  Environmental Protection and Enhancement Act

- **Salvageable**
  Anything that meets the merchantability standards, and to save woody material from destruction or waste and put it towards further use such as the manufacturing of wooden products.

**Note:** For merchantability standards and specifications the local Operating Ground rules for the area must be followed and can be obtained through the local Alberta Environment and Parks (AEP) office. [http://aep.alberta.ca/](http://aep.alberta.ca/)

1. Operating Requirements

1.1 As per CEMA (2011) other options, including coarse mulching, and use of materials such as coarse woody debris on reclaimed sites should be considered for managing woody debris before burning.

If burning is the desired management option, burn piles should be placed on upland or mineral soils. Upland surface soil under the burn piles must be salvaged prior to burning.

**Note:** Suncor’s EPEA operating approvals should also be referenced.

1.2 Burning operations must adhere to the Forest Prairie and Protection Act and Regulations which outlines burning requirements and timelines in Alberta.

1.3 All Suncor employees and contractors burning woody debris shall adhere to this standard and any requirements set out by the AEP, Regional Municipality of Wood Buffalo, and / or Suncor Emergency Services.

1.4 If the requirements and timing to burn woody debris coincides with wood burning by other Oil Sands operators in the Wood Buffalo Region, the local Lands and Forest Service branch may require the development of a joint smoke management strategy.
2. Operating Procedural Requirements

2.1 All Suncor employees and contractors who perform clearing of forest on behalf of Suncor shall:
   a) effectively clear-cut an area by utilizing all salvageable wood in order to minimize the amount of woody debris generated
   b) ensure all woody debris is removed or otherwise disposed of in a manner consistent with the guidelines in this standard
   c) estimate the volume of the unsalvageable woody debris requiring disposal
   d) evaluate all possible options of woody debris disposal before selecting burning
   e) notify the applicable Suncor environmental department, who shall determine whether to notify the local Lands and Forest Service branch, Suncor communication personnel, and the media of the status of the planned burning and smoke management control contingencies in effect
   f) notify the applicable Suncor environmental department, who shall determine what permits are required through consultation with the local Lands and Forest Service branch, obtain Lands and Forest permits if required; and obtain necessary burn authorization permits from Suncor Emergency Services department before burning (see LMP0024A).

Required Conditions 2.2 Fires shall be started and burned when conditions are good for rapid smoke dispersion. Required conditions include:
   • easterly or westerly winds
   • during strong dominant cold fronts or low-pressure systems (or troughs)
   • during slightly unstable atmospheric conditions
   • during the lowest feasible relative humidity consistent with fire control; and during the daytime.

Common Practices 2.3 Common burning practices shall be followed, including:
   • ensure all fire protection requirements are in place before beginning the burn
   • burn woody debris in piles or windrows by creating a bed of hot embers
   • avoid burning in the Athabasca River Valley and concentrate on burning above the river valley crest
   • construct control lines down to the mineral soil around piles before burning starts
   • avoid igniting organic soil by using brush rakes mounted on dozers to separate woody material from organic material
   • burn in small blocks so piles can be extinguished easily if required
   • have machinery (example – dozer or backhoe) work on burning piles to help ensure complete burns
   • be prepared to stop a burn if it is not burning according to plan or if weather conditions change
   • ensure all burning is properly and promptly extinguished when the wood has been consumed. This can be achieved by soaking the area down with water tankers, or using a cat guard down to the mineral soil.

End of Standard
The following individuals have approved and signed this document.

UserName: Sheila Chernys (schernys)
Title: Dir OS Enviro & Reg
Date: Wednesday, 06 April 2016, 01:14 PM Mountain Time
Meaning: Approver 1 Signed

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