

PART III

OPERATIONS

OPERATIONAL DETAILS

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1. INTRODUCTION

1.1 Plan Documentation

The LPG Emergency Response Assistance Plan consists of three Parts:

Part I **Management**

Addresses the overall organization and administration of the Plan; outlines the Corporation's methods for handling participation in the Plan, insurance, Plan costs and expenses, activation policy and management policies. Part I outlines how the business is run.

Part II **Preparedness**

Describes the Corporation's processes for preparedness and continual improvement. It includes response capability, methods for selecting and training personnel, defines equipment and training required. Potential scenarios are included outlining the response that would be provided to certain LPG emergencies. Part II describes what is in place to prepare for an emergency.

Part III **Operations Operational Details**

Sets out the Corporation's procedures for activating the Plan and discusses actual response activities: initiation, actions, site stabilization and post-incident actions and, "stand down procedure". Part III outlines what will be done at an incident scene.

The words "shall" and "will" are used in Parts I, II, III to indicate a mandatory requirement.

The Plan contains policies and procedures for all of LPGERC's processes and as such any changes made are subject to the approval of the Board of Directors.

2. SCOPE OF OPERATION

2.1 Plan Coverage

The Plan provides emergency response capability for:

1. “transportation” emergencies as required by the Transportation of Dangerous Goods Act, and
2. certain “stationary tank” incidents as described in the table below.

The scope of the activities covered by the Plan is:

Products:	<ul style="list-style-type: none">• LPG (as defined in Appendix A)
Container Types:	<ul style="list-style-type: none">• Tank Cars• Tank Trucks and Trailers• Tanks and Cylinders as described in Part I, 2.
Transportation Modes:	<ul style="list-style-type: none">• Rail• Road
Activities Inclusions/Exclusions:	<ul style="list-style-type: none">• <i>Includes</i> response to emergencies involving trucks, intermodal containers or tanks transported on marine vessels in Canadian territorial waters• <i>Excludes</i> response to emergencies involving marine bulk shipments• <i>Excludes</i> environmental remediation
Persons Responded For:	<ul style="list-style-type: none">• Plan Participants• Non Plan Participants as approved by the Corporation
Levels of Response:	<ul style="list-style-type: none">• Attendance of an RMA• Attendance of a Response Team

The Corporation does not perform environmental remediation.

3. OPERATING POLICIES

3.1 Function of the Corporation at an LPG Emergency

RMA's and/or Response Teams attend the scene of an LPG Emergency and provide services on behalf of the Plan Participant in accordance with the Corporation's Plan policies, procedures and SOGs.

RMA's will respond in an advisory capacity only to incidents involving small means of containment (as defined in Part I, 2).

RMA's and/or Response Teams shall remain at the scene of an emergency until released by a Response Manager.

The Corporation shall not perform the function of an Incident Commander at an LPG Emergency.

3.2 Communications - External

Media

Dealing with the media, answering questions from third parties (regulators, emergency officials, transportation officials, etc.) or offering or making comments regarding the emergency is a specialized aspect of handling an LPG Emergency. Questions shall be directed to the Plan Participant or Incident Commander.

Requests for technical information and LPGERC role at the scene will be referred to the HBC. Information must be restricted to LPGERC activities but not the cause of the incident.

Regulatory Reporting

Regulatory requirements concerning the reporting of a product discharge on behalf of the Plan Participant is not the responsibility of the LPGERC.

3.3 Equipment

Every RMA and Response Team shall maintain as a minimum, those items of equipment listed in Appendix F.

3.4 Procurement of Third-Party Equipment and Services

RMA's and RTL's may make recommendation to the Incident Commander on procuring, third-party equipment and services - for example, cranes or tow trucks. The Corporation has established certain policies and procedures with regard to such procurement:

Third-party equipment and services shall be ordered in the name of, and invoiced directly to, the Plan Participant or Transport Canada when direction and permission is given in accordance with 7.1 of the TDG Act or under any authority granted to a Transport Canada Inspector.

4. SYSTEM ACTIVATION

4.1 Activation

The emergency response operations shall be activated by a Response Manager. In the unlikely event that the Response Centre cannot be contacted, the HBC or designate can activate the Response.

The Response Manager obtains from the caller all of the information outlined in the Emergency Notification Form (see Appendix C).

4.2 Eligibility of Request

1. If the request for assistance at an LPG Emergency is received directly from a representative of a Plan Participant, and provided that the request is within the scope of the Plan, the Response Manager activates emergency response operations.
2. If the request for assistance at an LPG Emergency is received from a caller who is calling on behalf of a Plan Participant, and provided that the request is within the scope of the Plan, the Response Manager activates the emergency response operations *unless*:
 - the Plan Participant Prime Contact confirms that they are not the "offer for transport" or importer, or
 - the Plan Participant Prime Contact confirms that the incident will be handled internally and the LPGERC resources are not required.
3. If a request for assistance at an LPG Emergency is received from any person who cannot confirm that a Plan Participant is involved, the emergency response operations will not be activated. The Response Manager will advise the caller to contact his local emergency service (or CANUTEC).
No further action is taken unless an ERAP can be verified.

4. If a request for assistance is received from Transport Canada, the emergency response operations may be activated when:
- a) a formal written direction is given by Transport Canada to LPGERC to activate emergency services;
 - b) it has been confirmed by Transport Canada that liability coverage for the Corporation and its responders is in accordance with Part 20 of the Act and Transport Canada is responsible for paying all costs and expenses incurred as a result of the direction;
 - c) an Incident Commander has been assigned to the emergency site, and
 - d) the costs and expenses of the service provided will be agreed upon at the time of activation between the Corporation and Transport Canada in writing. The costs are as follows:

• RMA Fee	double Plan Participant rate
• RT per Team Member Fee	double Plan Participant rate
• Disbursements	actual costs
• Third Party Services	actual costs
• Administrative Fee	20% of total billing

The above rates exclude applicable taxes. Transport Canada is to pay LPGERC within 30 days of receipt of invoice.

4.3 Activation of Plan

Response Manager Activities:

1. accepts initial call for assistance;
2. collects relevant information associated with an incident and confirms Plan Participant is involved;
3. dispatches the nearest available RMA and/or a Response Team;
4. provides the RMA and/or Response Team being dispatched with information contained in the Emergency Notification Form (Appendix C);
5. notifies the designated Home Base Coordinator that the emergency response operations have been activated;
6. notifies Transport Canada (through CANUTEC) that the emergency response operations have been activated providing a valid ERAP number;
7. maintains a log of activities (Appendix C);
8. may update Plan Participant if requested to do so;
9. if requested, provide written confirmation to any Response Team that has been activated, and
10. release RMA/RT from scene.

Home Base Coordinator Activities:

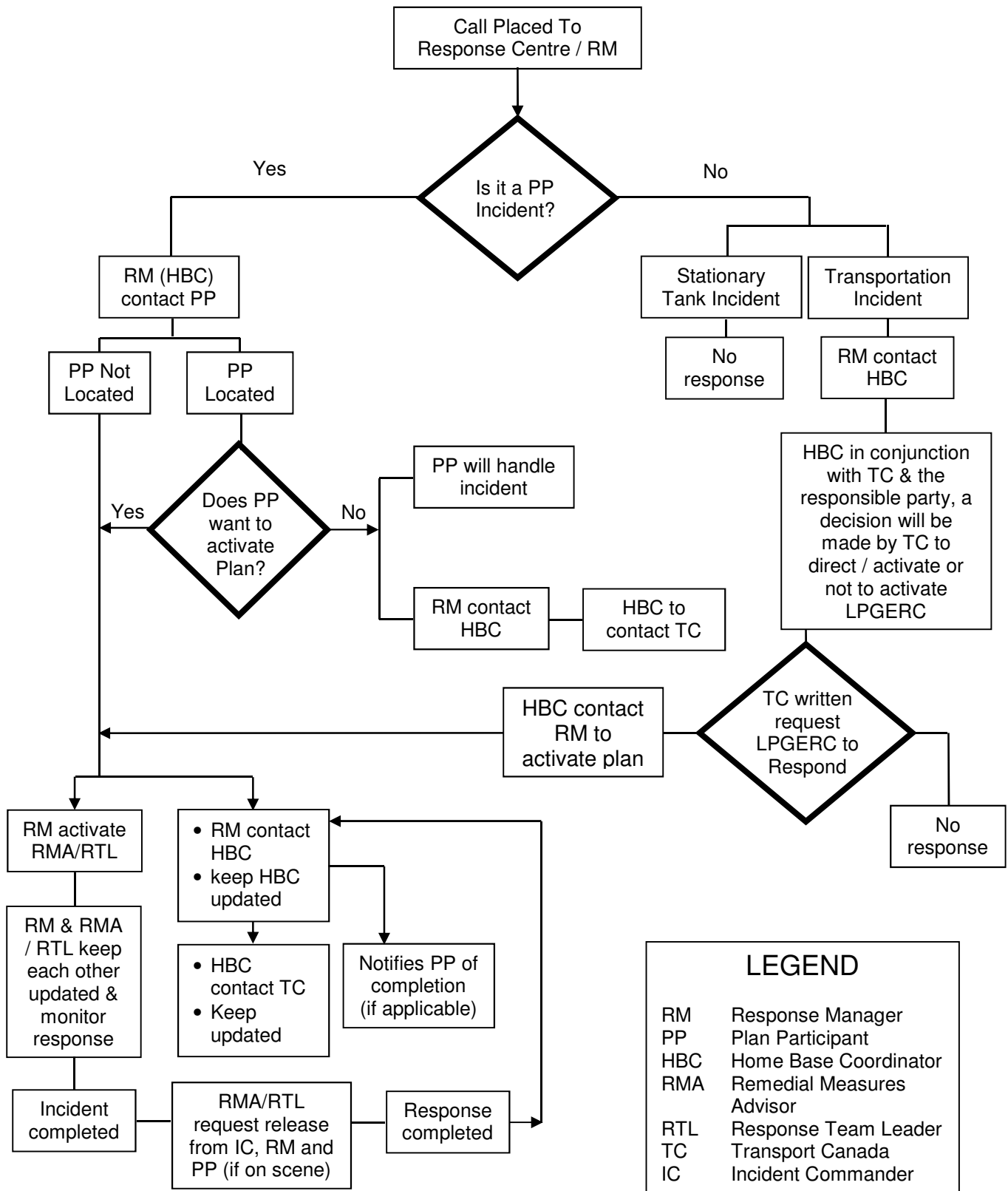
1. receives notification from the Response Manager that the emergency response operations have been activated;
2. notifies Transport Canada (through CANUTEC) that the emergency response operations have been activated if Response Manager is unable to do so;
3. monitors the response to an LPG Emergency;
4. notifies and maintains communication with the Plan Participant;
5. maintains a log of activities (Appendix C), and
6. responds to media requests pertaining to the LPGERC.

Remedial Measures Advisors / Response Team Leader Activities:

1. documents information which is recorded in the Emergency Notification Form (Appendix C);
2. attends the scene of an LPG Emergency when activated by a Response Manager or, in the unlikely event the RM is not available, the HBC may activate;
3. the RMA/RTL contacts the site to identify themselves, provide an estimated time of arrival and confirms as much information about the situation as possible;
4. RMA(s) and Response Team Members proceed to the emergency site with the mandatory equipment (Appendix F);
5. when arriving on site the RMA/RTL will introduce themselves to the Incident Commander or designate;
6. the RMA and/or Response Team Leader provides periodic progress reports to the Response Manager, and
7. obtains release from the Incident Commander, Response Manager and Plan Participant (if on scene) prior to leaving scene.

The chart on the next page illustrates the decisions and events which take place when the Plan is activated:

LPGERC RESPONSE / COMMUNICATION FLOWCHART



LEGEND	
RM	Response Manager
PP	Plan Participant
HBC	Home Base Coordinator
RMA	Remedial Measures Advisor
RTL	Response Team Leader
TC	Transport Canada
IC	Incident Commander

5. ON SCENE ACTIVITIES

On scene activities may include:

1. providing advice to the Incident Commander;
2. using portable gas detection equipment to measure combustible gas, oxygen and hydrogen sulphide, and providing an interpretation of the results to officials at the emergency site;
3. inspecting LPG container(s) to conduct a hazard and damage assessment;
4. making recommendations to officials at the emergency site on actions to be taken with respect to the LPG, the container and Site Safety Plan;
5. implementing preferred remedial options within the framework of the Plan;
6. securing valves and plugs;
7. fixing minor leaks and coordinating repairs;
8. communicating with emergency response personnel and officials at the site;
9. attending hearings, investigations or proceedings related to any emergency situation to which the RMA provided service, and
10. maintaining an incident log detailing events occurring during the LPG Emergency.

If an RMA and a RT are both present at the site of an LPG Emergency, the RMA may assist the RT and may act as the liaison with the Incident Commander.

6. STANDING DOWN AT INCIDENT

The RMA and/or RTL shall stand down:

1. if conditions are unsafe to proceed (reference applicable Right To Refuse regulations);
2. in the event the Incident Commander does not accept advice or recommendation made by the RMA and/or RTL;
3. if Incident Commander gives direction that is not in accordance with the Corporation's practices, procedures and SOGs;
4. if the RTL does not feel that the Response Team is capable of providing the services in a safe and effective manner, and
5. if Incident Commander involves non LPGERC personnel to work with, replace or direct the RMA and/or Response Team.

If RMA and/or RTL Stands-Down they shall:

1. ensure that all advice and recommendations given have been properly documented in the Incident Log;
2. advise the Incident Commander and the Response Manager of the reasons for standing down;
3. take no further remedial action, and
4. move to a safe distance until resolution or released as per SOG.

7. RELEASE OF RMA AND RESPONSE TEAM

When the RMA(s) and/or Response Team Leader are confident that their services are no longer required at the site, each of them shall:

- a) confirm with the Incident Commander that their services are no longer required and request release from the scene, and
- b) request release from the Response Manager prior to departing
- c) notify Response Manager when returned to original portal

If Plan Participant is on scene:

- notify Plan Participant of release

8. POST-INCIDENT ACTIVITIES

8.1 Incident Documentation

It is recommended that within 5 business days after the conclusion of an LPG Emergency:

1. the Response Manager will forward all records pertaining to the incident to the Corporation;
2. the RMA(s) and/or Response Team will send their Incident Logs to the Corporation, and
3. the RMA(s) and/or Response Team shall forward their expense claims and invoices to the Corporation. Such expense claims and invoices will be paid by the Corporation within 30 days of receipt (providing all paperwork i.e. Incident Logs and expenses are submitted completed).

8.2 Stress/Trauma

The Corporation recognizes that its responders may encounter situations during an LPG Emergency which will place them under stress. To assist responders through any periods of stress, the Corporation:

1. includes a session on critical incident stress management in its training curriculum, and
2. has arrangements in place to refer the personnel, if necessary, to professionals for further confidential assistance.

8.3 Post Incident Review

The review of each incident will be conducted by the Corporation to:

1. assess whether the activities were carried out in accordance with the Plan, and
2. determine if any issues need to be addressed.

The review will include:

1. assessing the conversations recorded by the Response Managers (if necessary);
2. examining the Incident Logs;
3. obtaining feedback from the Plan Participant and/or first responders who were on scene, and
4. summarizing items from response reviews for the Board and Operating Committee.