

**AltaGas Utilities**  
**Emergency Response Handbook Review**

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Prepared For  
**The Alberta Utilities Commission**

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## STATEMENT OF WORK

*The consultant is to review and provide a written report respecting ATCO Pipelines and AltaGas Utilities manuals that address gas utility pipeline integrity management and emergency response plans. The report should address the degree to which the manuals comply with legislation and standards including, but not limited to Sections 7 and 8 of the Pipeline Regulation, CSA Z662-11:Oil and Gas Pipeline Systems including Annex N, CSA Z731 Emergency Preparedness and Response and CSA Z1600 Emergency Management and Business Continuity. Recommendations to alleviate any deficiencies identified with the procedural manuals are to be provided. The consultant will also provide high level perspectives respecting recommended procedures or exercises for use in the AUC development of a gas utility pipeline procedural audit plan for integrity management and emergency response.*

## SCOPE

The following report addresses the compliance of AltaGas Utilities Emergency Response Handbook to the requirements of:

*CSA Z1600-08 Emergency management and business continuity programs*

*CSA Z731-03 Emergency Preparedness and Response*

*ERCB Directive 071<sup>1</sup> Emergency Preparedness and Response Requirements for the Petroleum Industry*

*Note: This report references ERCB Directive 071 - Revised November 18, 2008. The ERCB has prepared a draft update of Directive 071, which was open to feedback until January 15, 2013.*

The reports focus is on gas utility pipelines operated in excess of 700 kilopascals operating within the province of Alberta. The construction and operation of gas utility pipelines, operated in excess of 700 kilopascals, is regulated by the Alberta Utilities Commission.

The document used in the review was AltaGas Utilities Emergency Response Handbook, revision March 2002.

## METHODOLOGY

AltaGas Utilities Emergency Response Handbook was reviewed to the requirements of *CSA Z1600-08*, *CSA Z731-03* and *ERCB Directive 071*.

Policies, procedures and methods, both externally referenced and contained within the Emergency Response Handbook were categorized and evaluated as per the Standard or Directive.

The review's focus is to verify that AltaGas Utilities has documented policies, methods and procedures in place to manage the requirements of *CSA-Z1600-08*, *CSA-Z731-03* and *ERCB Directive 071*.

<sup>1</sup> Section 8 of the Pipeline Regulation requires that the licensee of a pipeline prepare and maintain a corporate emergency response plan in accordance with the requirements of ERCB Directive 071.

## REVIEW SUMMARIES

*Note: Documents referenced in the AltaGas Emergency Response Handbook were not reviewed, and may address deficiencies outlined in this report.*

AltaGas Utilities Emergency Response Handbook does not meet the requirements of CSA Z1600-08, CSA Z731-03 and ERCB Directive 071.

## REVIEW RECOMMENDATIONS

### Emergency Preparedness and Response

*The Pipeline Regulations, Part 1 Administration, Section 8(1) "A licensee of a pipeline shall prepare and maintain a corporate emergency response plan in accordance with the requirements of Directive 071 and shall submit a copy to the Board for review on request."*

AltaGas Utilities should develop a comprehensive Emergency Management Program that meets the requirements of CSA Z731-03 and ERCB Directive 071.

### Emergency Management and Business Continuity

*The National Strategy and Action Plan for Critical Infrastructure, Section 4. "The Strategy"*

*"The Strategy proposes that federal, provincial and territorial governments and critical infrastructure sectors collaborate to strengthen the resiliency of critical infrastructure in Canada.*

*The strategy recognizes that primary responsibility for strengthening the resiliency of critical infrastructure rests with the owners and operators.*

*....at the national level, the Strategy classifies critical infrastructure within the 10 sectors listed below:*

<i>Energy and utilities</i>	<i>Information and communication technology</i>
<i>Finance</i>	<i>Health</i>
<i>Food</i>	<i>Water</i>
<i>Transportation</i>	<i>Safety</i>
<i>Government</i>	<i>Manufacturing</i>

*The Government Emergency Management Regulation, Section 2 Responsibilities of the Alberta Emergency Management Agency<sup>2</sup>(1) " The Agency shall (f) require departments, in consultation with the Agency, (i) to prepare, implement and maintain, in accordance with the Government plans, consequence management plans, business continuity plans and any other plans required by a responsible Minister."*

AltaGas Utilities should develop a comprehensive Emergency Management and Business Continuity program that meets the requirements of CSA Z1600-08.

**AltaGas Utilities Emergency Response Handbook - Table 1  
CSA-Z1600-08 Review**

CSA-Z1600-08	AltaGas Utilities Pipelines Policies, Methods and Procedures	Comments
<b>1. Scope</b>		N/A
<b>2. Reference publications</b>		N/A
<b>3. Definitions</b>		N/A
<b>4. Program management</b>		
4.1 Leadership and commitment		No evidence of policies, methods or procedures.
4.2 Program coordinator		
4.3 Advisory committee		
4.4 Program administration		
4.4.1 General		
4.4.2 Policy		
4.4.3 Program goals and objectives		
4.4.4 Program plan and procedures		
4.4.5 Program Budget		
4.4.6 Records management		
4.4.7 Program review		
4.5 Laws and authorities		
4.6 Financial management		
<b>5. Planning</b>		
5.1 Hazard identification, risk assessment, and business impact analysis		No evidence of policies, methods or procedures.
5.1.1 Hazard identification		
5.1.2 Risk assessment		
5.1.3 Business impact analysis (BIA)		
5.2 Planning process		
5.3 Common plan requirements		
<b>6. Implementation</b>		
6.1 Prevention and mitigation		No evidence of policies, methods or procedures.
6.1.1 General		
6.1.2 Prevention		
6.1.3 Mitigation		
6.2 Resource management		
6.3 Mutual aid/mutual assistance		
6.4 Emergency response		
6.4.1 Strategy		
6.4.2 Plan		
6.5 Incident management		
6.6 Communications and warning		
6.6.1 Assessment and coordination		
6.6.2 Systems		
6.6.3 Procedures		
6.6.4 Public warning		
6.6.5 Public awareness		
6.6.6 Emergency information		
6.6.7 Crisis communications capability		

6.7 Operational procedures	ERH Responding to Gas Leaks ERH Responding to Fires and Explosions ERH Responding to Asphyxiation or Carbon Dioxide Poisoning ERH Responding to Loss of Gas Supply ERH Responding to a Gas Outage ERH Responding to a Natural Disaster ERH Responding to Personal Injury ERH Responding to District Loss of Communication ERH Release Response	
6.8 Facilities		No evidence of policies, methods or procedures.
6.9 Training		
6.10 Business continuity		
6.11 Recovery		
<b>7. Exercises, evaluations and corrective actions</b>		
		No evidence of policies, methods or procedures.
<b>8. Management review</b>		
		No evidence of policies, methods or procedures.

**AltaGas Utilities Emergency Response Handbook - Table 2  
CSA-Z731-03 Review**

CSA-Z731-03	AltaGas Utilities Pipelines Policies, Methods and Procedures	Comments
<b>1. Scope</b>		N/A
<b>2. Reference publications</b>		N/A
<b>3. Definitions and Abbreviations</b>		N/A
<b>4. Organization and Data Collection</b>		
4.1 Emergency Preparedness		No evidence of policy, method or procedure
4.2 Policy Statement		
4.3 Program Coordinator		
4.3.1 General		
4.3.2 Authority		
4.3.3 Consultation		
4.3.4 Committee		
4.4 Hazard Identification		
4.5 Emergency Response Plan (ERP) Development		
4.6 Legislation and Industry Codes of Practice		
4.7 Roles and Responsibilities		
4.8 Resources		
4.9 Emergency Response Procedures	ERH Responding to Gas Leaks ERH Responding to Fires and Explosions ERH Responding to Asphyxiation or Carbon Dioxide Poisoning ERH Responding to Loss of Gas Supply ERH Responding to a Gas Outage ERH Responding to a Natural Disaster ERH Responding to Personal Injury ERH Responding to District Loss of Communication ERH Release Response	
4.10 Mutual Aid Agreements		No evidence of policy, method or procedure
4.11 Contact List		
4.12 Communication System		
4.13 Public Education and Information		
<b>5. Emergency Response</b>		
5.1 General		No evidence of policy, method or procedure
5.2 Records		
5.2.1 General		
5.2.2 Types of Records		
5.2.3 Reasons for Record Retention		
5.3 Incident Management		
5.3.1 General		
5.3.2 Facilities		
5.4 Coordinated Response		
5.4.1 General		
5.4.2 Activation of the ERP		

5.4.3	Situational Assessment		
5.4.4	Action Plan		
5.4.5	Resource Mobilization		
5.4.6	Notification and Reporting		
5.4.7	Damage Assessment		
5.4.8	Claims Management		
5.4.9	Public Communications		
5.4.10	Critical Incident Stress Management		
5.4.11	End of Emergency		
5.5	Review and Debriefing		
<b>6. Administration</b>			
6.1	Training		No evidence of policy, method or procedure
6.2	Equipment Inspection and Maintenance		
6.3	Exercises		
6.4	Distribution		
6.5	Updating		
6.6	Approval		
6.7	Audit		

**AltaGas Utilities Emergency Response Handbook - Table 3**  
**ERCB Directive 071 Review**

ERCB Directive 071	AltaGas Utilities Pipelines Policies, Methods and Procedures	Comments	
<b>1. Introduction</b>		N/A	
<b>2. Corporate Level ERPs</b>			
<p>2.1 Corporate-level ERP Requirements  The licensee must have a corporate-level ERP with preplanned procedures that will aid in effective response to an emergency.  The licensee is expected to determine the level of detail required to address each item in a corporate-level ERP based on the hazards and potential consequences of the emergency scenarios that its operations pose to the public and/or environment and to keep the plans current. Corporate-level ERP's do not require ERCB approval; however, the ERCB may request that they be submitted for review.</p>		No evidence of policy, method or procedure	
<p>2.1 Corporate-level ERP Requirements  As a minimum, the licensee must include the following information in its ERP:</p>		No evidence of policy, method or procedure	
	key licensee contacts	ERH Appendix IX	
	a 24 hour licensee emergency contact telephone number		
	a method of classifying incidents and response actions for specific incidents		No evidence of policy, method or procedure
	a communications plan that addresses <ul style="list-style-type: none"> <li>- communication with response team</li> <li>- communication with the public and media, and</li> <li>- downgrading and stand-down of emergency levels,</li> </ul>		
	responsibilities of personnel required to respond to an emergency	ERH Responding to Gas Leaks ERH Responding to Fires and Explosions ERH Responding to Asphyxiation or Carbon Dioxide Poisoning ERH Responding to Loss of Gas Supply ERH Responding to a Gas Outage ERH Responding to a Natural Disaster ERH Responding to Personal Injury ERH Responding to District Loss of Communication ERH Release Response	
	establishment of incident management systems, and		No evidence of policy, method or procedure
	activation of a reception centre		
3	The license must ensure that a call to its 24 hour emergency telephone number initiates immediate action.		No evidence of policy, method or procedure

4	The licensee must ensure that its 24 hour emergency telephone number is posted by way of a conspicuous sign erected at the primary entrance to all licensee wells and facilities.		
2.1.1 Assessment Matrix for Classifying Incidents The ERCB has developed an assessment matrix so that incidents can be classified and communicated to others by industry, local authorities, RHA's, and government agencies in a consistent manner throughout the province.			No evidence of policy, method or procedure
5	The licensee must include all the information in Appendix 4 in its corporate-level ERP.		
6	The licensee must define appropriate actions, including public protection measures that would be taken for each level of emergency.		No evidence of policy, method or procedure
2.1.2 Communications Planning The development and implementation of an effective communications plan is essential to emergency response. In its corporate-level ERP, the licensee must			
7	describe its procedures for contacting and maintaining communication with key licensee personnel, government agencies, support services, members of the public, and the media;		
	clearly define the responsibility to contact the ERCB and other responders in the event of an emergency; the ERCB recommends that a communications flow chart be included in the ERP, identifying responsibilities by role;		No evidence of policy, method or procedure
	describe procedures that will be implemented during an incident to contact and maintain communication with directly impacted members of the public in order to keep them informed of the situation and the actions being taken; this includes plans for communicating the implementation of public protection measures, such as evaluation and sheltering in place for residents;		
	describe procedures that will be used to inform and update the media and procedures in getting factual messages out to the public at large in an expeditious manner; and		
	describe procedures to downgrade and stand--down levels of emergency.		
2.1.3 Responsibilities of Personnel The licensee must identify the roles and responsibilities of personnel required to effectively respond to an emergency. One or more functions can be assigned to an individual depending on the complexity of the potential response to an emergency.			
2.1.4 Incident Management Systems In its corporate-level ERP, the licensee must			

9	describe how it will manage and coordinate a response to an emergency, and		
	address the roles and responsibilities of personnel at its on-site command post, the company regional emergency operations centre (REOC), and the corporate EOC.		
2.1.5 Reception Centre In its corporate-level ERP, the licensee must set out the procedures for			
10	activating a reception centre located at a safe distance from the release source, and		
	meeting and registering evacuees at the reception centre.		
<b>3. Emergency Planning and Response Zones</b>			N/A
<b>4. Public and Local Authority Involvement in Emergency Preparedness and Response</b>			N/A
<b>5. Common Requirements for ERPs</b>			
5.1 Assessment Matrix for Classifying Incidents All incidents are classified as an alert or as a level-1, 2 or 3 emergency. Incidents that can be handled on site through normal operating procedures are very low risk and are typically defined as an alert. Those with low to high risk require a more difficult or complex resolution and are defined as emergencies.			No evidence of policy, method or procedure
1	The licensee must include all the information in Appendix 4 in its ERP.		
2	The licensee must define appropriate actions, including public protection measures that would be taken for each level of emergency.		
5.2 Public Protection Measures The licensee must ensure that maps included in the ERP are sized to provide a clear representation of the entire mapped area and clearly identify			
12	trapping area, grazing lease, and range allotment boundaries and their reference numbers;		
	other industrial operations, including oil and gas operations;		
	railways and airports;		
	corporate boundaries (e.g., hamlets, villages, towns);		
	municipal and RHA boundaries;		
	a legend, scale, and north directional indicator; and		
5.4 Equipment List The licensee must ensure that the ERP includes a list (including location, number, and type) of the following:			
13	communications equipment for the public safety coordinator, rovers, roadblock and air monitoring personnel, and any others that require it (the licensee is responsible for ensuring that communications equipment is made available to key response personnel);		
	equipment for roadblock kits (including contents);		
	ignition equipment that is maintained on site; and		

	gas monitoring equipment.		
5.5 Mutual Aid Understandings Mutual aid understandings should define each participant's commitment to provide aid and support during an incident and may also include other responsibilities agreed to during planning. The licensee is encouraged to provide details of mutual aid understandings in the ERP.			
5.6 Telephone Lists The licensee must include in its ERP		ERH Appendix IX	
14	a telephone list of key internal personnel designated to assist in emergency response; and		
	a telephone list of external emergency support services that may be required in an emergency, including, but not limited to, government departments and agencies, communication services, air monitoring services, emergency services, and oil spill cooperatives.		
5.7 Plan Distribution			No evidence of policy, method or procedure
17	The licensee must ensure that all required plan holders have a copy of the approved ERP.		
	The licensee must ensure that a plan distribution list is included in the ERP.		
5.8 Communications Planning The development and implementation of an effective communications plan is essential to emergency response. The licensee must			
19	describe its procedures in the ERP for contacting and maintaining communication with key licensee personnel, government agencies, support services, and the media;		
	clearly define the responsibility to contact the ERCB and other responders identified in the plan in the event of an emergency; the ERCB recommends that a communications flowchart be included in the ERP, identifying responsibilities by role;		
	ensure that the ERP clearly describes procedures that will be implemented during an incident to contact and maintain communication with directly impacted members of the public in order to keep them informed of the situation and actions being taken; this includes plans for communicating implementation of public protection measures, such as evacuation and sheltering in place for occupants within and beyond the EPZ, if applicable; and		
	describe procedures that will be used to inform and update the media and procedures in getting factual messages out to the public at large in an expeditious manner; the messages should be coordinated among all parties.		

20	If there are separate ERPs for a gathering system that is tied into the sour operations facility, HVP pipeline, or cavern storage facility, then all the licensees must ensure that their ERPs have a bridging paragraph outlining what emergency communication will take place between the parties in the event of an emergency. The sour operations, HVP pipeline, or cavern storage facility ERP bridging paragraph refers to the other ERPs and vice versa.		
5.9 Responsibilities of Personnel In its ERP, the licensee must			No evidence of policy, method or procedure
21	identify roles and responsibilities of personnel required to effectively respond to the emergency, and provide the names of key personnel and responders.		
One or more functions can be assigned to an individual depending on the complexity of the potential response to an emergency. As a minimum, the licensee is expected to assign the following responsibilities to personnel. If applicable:			
21	field incident command		
	public safety coordination including evacuation and sheltering		
	roadblocks and rovers		
	air quality monitoring		
	ignition, and		
	communication with the responders, media and public.		
5.10 Incident Management Systems In its ERP, the licensee must			
22	describe how it will manage and coordinate a response to an emergency, and		
	address the roles and responsibilities of personnel at its on-site command post, company REOC, and corporate EOC.		
5.11 Record Keeping As part of its notification and consultation programs, the licensee must have a process for recording the following:			
23	local authority and other government discussions,		
	type of notification provided to the residents in an urban centre,		
	attempts made to contact an individual if the licensee was unable to make contact, and		
	consultation with the public, including unsuccessful attempts to contact or obtain the cooperation of any required persons and any outstanding issues yet to be resolved.		
5.12 Reception Centre			
24	The licensee must include procedures in the ERP for establishing, activating, staffing, and meeting and registering evacuees at the reception centre		No evidence of policy, method or procedure

5.13 Downgrading and Stand-down of Emergency Levels			
25	The licensee must include procedures in the ERP to downgrade and stand-down levels of emergency.		
<b>6. Sour Well Site-specific Drilling and/or Completion ERP's</b>			N/A
<b>7. Sour Operations ERPs</b>			N/A
<b>8. ERPs for HVP Pipelines</b>			N/A
<b>9. ERPs for Cavern Storage Facilities Storing HVP Product</b>			N/A
<b>10. Spill Cooperative Response Plans</b>			
10.1 Requirements	A licensee is exempt from the requirement to develop its own spill response plan, purchase spill cleanup equipment, and conduct an annual exercise if it is an active member in good standing of an oil spill cooperative. Spill preparedness requirements apply to <ul style="list-style-type: none"> <li>• all wells</li> <li>• facilities, and</li> <li>• pipelines transporting liquids and licenced to the ERCB</li> </ul>	ERH Release Response	No evidence of policy, method or procedure
10.2 Member of an Oil Spill Cooperative			
10.2.1 Spill Cooperative Response Plan Contents			
	The spill response plan addresses a release of any liquid product onto land or water from any well, pipeline, or facility described above. The plan, which may consist of several different manuals, contains the following:		
	a description of initial emergency response procedures and actions, as well as information on all contacts and services;		
	an inventory of wells, pipelines carrying liquids, and associated facilities;		
	topographical maps showing designated spill control points (if applicable), access roads, urban centres, bodies of water (i.e. streams, rivers, lakes) and water supply intakes for municipal and industrial operations, pipelines, wells, and facilities within the operating area;		
	roles, responsibilities, and resources to manage the response ( the on-scene commander role can be filled with a designated licensee employee or a third party with appropriate expertise);		
	policies for worker safety at emergency spill management sites;		
	inventory and location of response equipment;		
	containment and recovery procedures applicable to the type, volume, and nature of the production and time of year; and		
	annual training and exercise programs, a record of the training and exercises, and recommendations for continuous improvement.		
10.3 Member of an Oil Spill Cooperative			No evidence of policy, method or procedure
10.3.1 Spill Cooperative Response Plan Contents			

<p>The licensee must have an ERCB approved plan in place to address a release of any liquid product onto land or water from any well, pipeline, or facility described in Section 10.1. The plan is expected to address the following components:</p>		
1	<p>a description of initial emergency response procedures and actions, as well as information on all contacts and services;</p> <p>an inventory of wells, pipelines carrying liquids, and associated facilities;</p> <p>topographical maps showing designated spill control points (if applicable), access roads, urban centres, bodies of water (i.e. streams, rivers, lakes) and water supply intakes for municipal and industrial operations, pipelines, wells, and facilities within the operating area;</p> <p>roles, responsibilities, and resources to manage the response ( the on-scene commander role can be filled with a designated licensee employee or a third party with appropriate expertise);</p> <p>policies for worker safety at emergency spill management sites;</p> <p>inventory and location of response equipment;</p> <p>containment and recovery procedures applicable to the type, volume, and nature of the production and time of year; and</p> <p>annual training and exercise programs, a record of the training and exercises, and recommendations for continuous improvement.</p>	
<p>10.3.2 Spill Response Equipment Requirements A licensee that is not a member of an oil spill cooperative must</p>		<p>No evidence of policy, method or procedure</p>
2	<p>purchase appropriate spill cleanup equipment, considering the type of operations and terrain in which the licensee operates,</p> <p>maintain the equipment in good working order, and</p> <p>store the equipment in the general area where it may be required and ensure immediate access to it.</p>	
<p><b>11. Corporate-level ERPs</b></p>		
<p>11.1 Requirements</p>		<p>No evidence of policy, method or procedure</p>
1	<p>If an ERP is not required, the licensee must have an up-to-date copy of the corporate-level ERP (hard copy or electronic) available at a response location(s) in its area of operations.</p>	
2	<p>The licensee must review the corporate-level ERP with personnel assigned roles and responsibilities to ensure that it can be properly implemented.</p>	
<p>11.1.1 Assessment Matrix for Classifying Incidents</p>		
3	<p>The licensee must use the Assessment Matrix for Classifying Incidents (Appendix 4) to classify an incident.</p>	
4	<p>The licensee must contact the ERCB immediately after it has communicated and activated internal response</p>	

	resources to confirm the level of emergency and convey the specifics of the incident.		
<b>11.1.2 Communications Planning</b>			
5	After contacting the ERCB, the licensee must notify the local authority, the RCMP/police, the local RHA, other applicable government agencies, <sup>12</sup> and support services required to assist with initial response if the hazardous release goes off site and has the potential to impact the public or if the licensee has contacted members of the public or the media.		
6	The licensee must make the information in Appendix 8 available to the public as soon as possible during an emergency.		
<b>11.1.2.1 Downgrading and Stand-down of Emergency Levels</b>			
7	Once the situation improves, the licensee must make the decision to downgrade or stand-down an emergency in consultation with the ERCB. The ERCB will consult with other applicable agencies and confirm with the licensee that the emergency downgrade or stand-down is appropriate.		
8	The licensee must keep all notified and evacuated persons and the media informed of the status of an emergency.		
<b>12 Emergency Planning Zone</b>			N/A
<b>13 Public and Local Authority Involvement in Emergency Preparedness and Response</b>			N/A
<b>14 Common Requirements for ERPs</b>			
<b>14.1 ERP Location</b>			No evidence of policy, method or procedure
1	The licensee must have an up-to-date copy of the ERP (hard copy or electronic) at a response location(s) in its area of operations.		
<b>14.2 Assessment Matrix for Classifying Incidents</b>			
2	The licensee must use the Assessment Matrix for Classifying Incidents (Appendix 4) to classify an incident.		
3	The licensee must take appropriate actions, including public protection measures, for each level of emergency.		
4	The licensee must contact the ERCB immediately after it has communicated and activated internal response resources to confirm the level of emergency and convey the specifics of the incident.		
<b>14.3 Public Protection Measures</b>			N/A
<b>14.4 Equipment Location and Calibration</b>			No evidence of policy, method or procedure
16	The licensee must ensure that equipment identified in the ERP is available and located where specified in the ERP for any operation.		
17	The licensee must ensure that company equipment is operational and the appropriate documentation is		

	available to verify testing and calibration requirements.		
14.5 Communications Planning			No evidence of policy, method or procedure
18	After contacting the ERCB, the licensee must notify the local authority, RCMP/police, the local RHA, government agencies, <sup>15</sup> and support services required to assist with initial response if the hazardous release goes off site and has the potential to impact the public or if the licensee has contacted members of the public or the media.		
19	The licensee must make the information listed in Appendix 8 available to the public as soon as possible during an emergency.		
14.5.1 Downgrading and Stand-down of Emergency Levels			
20	Once the situation improves, the licensee must make the decision to downgrade or stand-down an emergency in consultation with the ERCB. The ERCB will consult with other agencies as applicable and confirm with the licensee that the emergency downgrade or stand-down is appropriate.		
21	The licensee must keep all affected persons and the media informed of the status of an emergency.		
14.6 Plan Management Process The licensee must demonstrate that its plan management process keeps ERPs up to date. A plan management process ensures that			
22	plans are reviewed and updated on a semi-annual basis, if necessary, with changes made to ensure that the information remains accurate; updates could be triggered by some or all of the following: <ul style="list-style-type: none"> <li>• changes to current emergency information,</li> <li>• new mapping information—a small map of the affected area showing the changes would be acceptable for a period of one year,</li> <li>• new resident information,</li> <li>• any changes to response staff information or response capabilities, and</li> <li>• facility additions such as well or pipeline tie-ins that do not require submission of a supplement;</li> </ul>		
	residents are contacted to update their information; and		
	ground truthing identifies any changes, such as new residents, businesses, and renters, and verifies the ERP maps—the licensee may use any method for ground truthing.		
14.8 Reception Centre When evacuation of residents is required, the licensee must			No evidence of policy, method or procedure
26	activate a reception centre located at a safe distance from the release source, and		

	meet and register evacuees at the reception centre.		
14.9 Training Sessions The licensee must provide training sessions to ensure that response personnel are competent in emergency response procedures.			
27	The licensee is expected to provide ERP training on <ul style="list-style-type: none"> <li>the overall plan</li> <li>roles and responsibilities during an incident</li> <li>public protection measures used during an emergency, and</li> <li>available communication methods.</li> </ul>		
14.10 Exercise Requirements			
28	The licensee must test its ERPs through the following types of planned exercises to promote emergency response preparedness: <ul style="list-style-type: none"> <li>tabletop or communications exercise, held annually for each area ERP, except in a year when a major exercise is held, and</li> <li>major exercise, held once every three years for each area ERP.</li> </ul>		
29	The licensee must <ul style="list-style-type: none"> <li>notify the appropriate ERCB Field Centre 30 days in advance of a scheduled exercise via the ERCB DDS system, and</li> <li>invite the local authority, the RHA, or any other government department or agency to participate and/or observe at major exercises.</li> </ul>		
14.11 Record Keeping The licensee must have a process for recording the following activities:			
30	Incident Records formation gathered during and following an incident: these records provide documentation to be used for assessment, historical, and analytical purposes (see Appendix 9: First Call Communication Form, which may be used during an incident)		
	Keeping ERPs Current efforts to keep the ERP current, including attempts to contact or obtain the cooperation of any required persons and any outstanding issues yet to be resolved		
	Training, Meetings, and Exercise Records		
<b>15. Sour Well Site-specific Drilling and/or Completion ERPs</b>			N/A
<b>16. Member of an Oil Spill Cooperative</b>			
16.1.1 Spill Training Exercises and Notification Requirements		ERH Release Response	No evidence of policy, method or procedure
1	As part of its spill response training, a licensee that is a member of a spill cooperative must <ul style="list-style-type: none"> <li>attend and be appropriately represented at a minimum of one cooperative annual exercise</li> </ul>		

	<p>in the area where its operations are located; attendance at an exercise held outside of the area in which the licensee operates facilities is considered satisfactory, provided that the administrator of each spill cooperative involved is notified in advance for tracking purposes; or</p> <ul style="list-style-type: none"> <li>• have an area representative complete a spill response course, self-study spill responder course, or on-scene spill commander course from a recognized training institution in lieu of attendance at an oil spill cooperative exercise; this option cannot be used in consecutive years by the licensee; further, if the option of taking a course in lieu of exercise attendance has been used, the licensee needs to notify the local oil spill cooperative administrator in advance for tracking purposes.</li> </ul>		
2	<p>The spill cooperative must notify the appropriate ERCB Field Centre in writing at least 30 days in advance of a spill equipment deployment training exercise or a tabletop exercise and include the following information:</p> <ul style="list-style-type: none"> <li>• the type of training exercise, the date on which it will be conducted, and the legal description of the land on which it will be conducted;</li> <li>• a map showing the general topography, location of and access routes to the deployment area, and the location of any municipal water intakes within 3 kilometres (km) of the deployment area;</li> <li>• the proposed spill material and volume to be used, if any (any liquid spill medium used in the exercise has to be edible canola oil or mineral oil, dyed with an innocuous dye that harms neither water quality nor flora and fauna);</li> <li>• comments on the public use of the area, the collection and disposal of garbage, and a statement indicating the extent, if any, of anticipated surface disturbance to stream banks or shorelines at the test site; and</li> <li>• the name of the landowner on whose land the training exercise will be held, and confirmation that the landowner is agreeable to the exercise proceeding at the proposed test site.</li> </ul>		
16.1.2 Training Exercise Report Summaries			
3	<p>The spill cooperative must complete the training exercise report summary within 30 days following the</p>		

	training exercise and make it available to the ERCB upon request for a period of two years following each training exercise.		
16.2 Non-member of an Oil Spill Cooperative			
16.2.1 Spill Training Exercises and Notification Requirements			
4	A licensee that is not affiliated with a local spill cooperative must conduct its own exercise in the area where its operations are located.		
5	The licensee must demonstrate the same competencies as an oil spill cooperative member.		
6	<p>The licensee must notify the appropriate ERCB Field Centre in writing at least 30 days in advance of the spill equipment deployment training exercise or tabletop exercise and include the following information:</p> <ul style="list-style-type: none"> <li>the type of training exercise, the date on which it will be conducted, and the legal description of the land on which it will be conducted;</li> <li>a map showing the general topography, location of and access routes to the deployment area, and the location of any municipal water intakes within 3 kilometres (km) of the deployment area;</li> <li>the proposed spill material and volume to be used, if any (any liquid spill medium used in the exercise has to be edible canola oil or mineral oil, dyed with an innocuous dye that harms neither water quality nor flora and fauna);</li> <li>comments on the public use of the area, the collection and disposal of garbage, and a statement indicating the extent, if any, of anticipated surface disturbance to stream banks or shorelines at the test site; and</li> <li>the name of the landowner on whose land the training exercise will be held, and confirmation that the landowner is agreeable to the exercise proceeding at the proposed test site.</li> </ul>		
16.2.2 Training Exercise Report Summaries			
7	The licensee must complete the training exercise report summary within 30 days following the training exercise and make it available to the ERCB upon request for a period of two years following each training exercise.		