

FAQ for Emergency Management Regulation Changes effective March 1, 2018

The following questions and answers were developed from an industry-Commission discussion session on 14 February, 2018.

1. Is it okay to be trained by JIBC for BCERMS and ICS?
 - a. Our intent is to ensure permit holders focus on training opportunities that are consistent with what other first responders are using. Alberta Emergency Management, JIBC, and others recognized by ICS Canada or their provincial partners have this capacity.
2. We are an international company and in the US we use NIMS, not ICS.
 - a. Much like BCERMS, there are some minor interpretations of the ICS system in use. To be effective in an incident response process, consistency between responding agencies is vital, and ICS achieves this commonality. Our focus is on outcomes, and your ability to effectively integrate with other potential response partners and agencies.
3. In regards to training, the emergency management manual says should have some specific courses – and some are not ICS courses we are familiar with.
 - a. While we highly recommend a number of specific ICS courses, the manual includes some other training references as well. Our experience has found that these other courses – or any similar training – are vital to understanding how the various roles actually work together, and provide a practical, hands-on opportunity to test functions and processes. Whenever possible, we also urge permit holders to seek out opportunities for ICS and other incident management training with their local communities.
4. We are a part of WCSS – can reference be made to the WCSS procedures or do we have to put that into the Core.
 - a. We recommend consolidating all of your response materials and processes into your emergency response plans. Common elements, which may include WCSS developed guidance, could form a key part of your ERP.
5. I can't staff a full ICS chart locally. What do I do?

- a. You need to consider how critical roles can be fulfilled, and which are vital to have in field operations, and which can be managed by your company's EOC. The role of the EOC is to support the on-scene incident commander and their team. Past incidents and exercises have seen finance, admin, risk management and advanced planning all facilitated through a head office team. Since you scale your org chart based on the needs of the incident, you may find that some roles or functional areas only require minimal, or even no staffing – as unassigned duties are managed by the incident commander.
6. On page 10, when a facility isn't in use, do an HRVA and it may not have to be in an ERP.
 - a. The reference includes a number of criteria that must be met for exclusion from an emergency response plan, including an HRVA. Please note that this reference only considers exclusion from a supplemental plan. The permit holder continues to have public safety obligations which can be met through the processes outlined in a CORE plan, similar to how a CORE plan may be used during the construction phase of a pipeline, facility or well pad. Supplemental / site specific plans are required prior to any asset being placed into service, and these plans must be maintained until the asset is no longer in use, and all associated risks have been eliminated.
7. March 1 is the compliance date? Will there be no grace period?
 - a. The Commission announced changes to the Emergency Management Regulation in December, 2017, providing several months of advance notice. Prior to issuing the new regulation, Industry associations were consulted on this very subject, and no concerns about the implementation date were noted. All ERPs submitted on or after March 1st must be in compliance with the new regulations. Permit holders submitting in advance of this deadline may develop their plans to meet either the new regulation, or the regulation in place until March 1st.
8. I am drilling in April under new regs, but my Core is not due until November. What should I do?
 - a. We recognize that there will be some overlap in the first year. ERPs are expected to be in compliance with regulations that are in place at time of submission. There is no need to resubmit plans in order to be compliant.
9. What is an accountable officer for ERP review and responsibility?
 - a. The ERP is vital for the protection of public safety and the environment. Errors and omissions can have significant consequences. For this reason, only persons with authority to implement or direct changes to practices and processes contained within a plan should be considered an accountable person.

10. Under new regulations there are more rigorous training requirements for responders. Do they need to have all this training before March 1?

- a. We recognize that training to staff ICS roles can be time consuming, and that training resources and programs need time to adjust to these requirements. A well thought out, and appropriately resourced emergency management program has been a requirement under regulation for several years, so our expectation is that program leaders will have a training plan in place as of March 1st that will efficiently and promptly connect staff needing training with those resources.

11. Are the risk management and safety officer interchangeable?

- a. Yes, these are fundamentally similar positions, though in larger organizations risk management may take on legal issues and concerns, while a safety officer focuses on ensuring responder wellbeing.

12. Your guidance directs us to put OGC's emergency contact number of the front, but our Core is also sent to other regulators. Do we really need to have OGC's number on the front?

- a. The OGC emergency contact number must appear on the front of all supplemental plans. For CORE plans, it is acceptable to include the number within the document so long as there is a simple and clear index to guide users to it.

13. The OGC would allow two smaller permit holders to do a combined exercise. Can a small permit holder do an exercise with a larger permit holder?

- a. Our goal is to ensure any incident has a robust, and safe response through collaboration of field staff within an operating area. If the smaller permit holder has a meaningful role, we would be prepared to consider it.

14. I share a right of way with another permit holder. My line is sweet, theirs is sour. Do I need to show their EPZ on my map?

- a. You don't have to show another permit holder's EPZ on your map but as part of a good risk assessment you should know the risks surrounding your assets and have conversations with the other permit holder. You should know what to do if you had an incident that caused a release on the other permit holder's line, including potential coordination (ICS – Unified Command) and any additional safety precautions or considerations that may be necessary for your own first response staff. You may also want to consider a joint exercise to test assumptions you have made in your response plans.

15. Can you clarify the difference between exercises and a drill?

- a. A drill is a highly focused process such as a man down drill, how to ESD a plant, set up a road block, or conduct a site evacuation and muster. Drills are typically conducted on a regular basis, and supplement good working practices such as tailgate safety meetings, or reviewing a key section of your ERP.

An exercise pulls together these various competencies, using a scenario that reflects one or more of the hazards identified in your HRVA process, and adding details and complexity through the use of injects – changes in weather, additional equipment malfunctions, simulated injuries, etc.

16. Are permit holders required to document drills?

- a. Your emergency management program should have a documentation process for all your drills, exercises, staff training and courses, etc. Lead operators and managers should be aware of what competencies, and potential gaps they have within their operating area team, and have a process to ensure any such gaps are quickly addressed.

17. What is an Emergency Awareness Zone compared to an Emergency Planning Zone?

- a. When an EPZ is based on a sour product release, the calculated values create a public safety zone consistent with exposure limits. For all other hazards, the EPZ must be determined by the permit holder in accordance with regulation. An EAZ is typically twice the EPZ diameter and defines an area where there may be public impacts which are not immediately threatening to life and safety. The EAZ is not a consultation boundary – please see the Consultation and Notification regulation if you need more information on requirements to consult.

18. Should hazards be listed in the Core or the Field / Supplemental?

- a. Hazards specific to an operation should be listed in the applicable field / pipeline / facility supplemental plan.

19. How many attempts are permit holders obligated to make to contact landowners?

- a. When the permit holder is obligated to provide or gather information, multiple attempts may be necessary, and should consider any special conditions that would indicate period in time when success may be more likely – such as growing season for farm operations, hunting season for guide-outfitters, etc. Try to schedule your attempts at a time when communication is more likely to be successful. If seeking an exemption for a specific person or group, it will be necessary to enumerate all efforts that have been made.