Lack of Public Awareness at High Consequence Sites
Transparency

= Communication & openness

Audience:
- Right to know vs need to know.
- Highest ‘need to know’ is among vulnerable populations and first responders
Existing requirements

• We have federal regulations that are intended to ensure that people who have a ‘need to know’ are provided with necessary information.
Onshore Pipeline Regulations

- **OPR Section 34** states,
  - A company shall take *all reasonable steps* to inform *all persons who may be associated with an emergency response activity* on the pipeline of the practices and procedures to be followed and *make available to them the relevant information* that is consistent with that which is specified in the emergency procedures manual.

- **OPR Section 35** states,
  - A company shall develop a *continuing education program* for the police, fire departments, medical facilities, *other appropriate organizations and agencies and the public residing adjacent* to the pipeline to inform them of the *location* of the pipeline, *potential emergency situations* involving the pipeline and the *safety procedures* to be followed in the case of an emergency.
OPR Section 6.5 (1) states [in part],

- A company shall, as part of its management system and the programs referred to in section 55,
- (c) establish and implement a process for identifying and analyzing all hazards and potential hazards;
- (d) establish and maintain an inventory of the identified hazards and potential hazards;
- (e) establish and implement a process for evaluating and managing the risks associated with the identified hazards, including the risks related to normal and abnormal operating conditions;
- (f) establish and implement a process for developing and implementing controls to prevent, manage and mitigate the identified hazards and the risks and for communicating those controls to anyone who is exposed to the risks;

Questions:

- When companies identify hazards & potential hazards, does the inventory include hazards from the pipeline, to the pipeline, or both?
- Are these inventories available to the public?
- Are these inventories available to first responders?
**High-Consequence Sites (HCSs)**

- **Definition of HCS:**
  - Very close *proximity* to transmission PL, clearly within the initial impact zone;
  - Large *population*;
  - Obvious *evacuation* difficulties;
  - Unfavourable *topography* (flat or downhill, pavement, sewers, underground parking, etc);
  - Potential for *explosion* (eg. confined spaces, ignition sources)

- HCSs exist inside and outside of HCAs.
  * A prudent goal should be the prevention of new HCSs and close monitoring of existing ones.

Please confirm: There is no database of HCSs and therefore no ready mechanism for close monitoring of these sites.
Eight HCSs with very low awareness

1. Holsgrove Public School: 100 students?
2. Holiday Inn Airport East: 191 rooms
3. Emery Collegiate: 600 students & staff?
4. Fountainhead Apartments: over 3,000 tenants
5. TTC-Finch subway: thousands per day
6. Place Nouveau condo: 22 storeys
7. Villa Elegance seniors’ condo: 12 storeys
8. Yee Hong Geriatric: 5 storeys, 155 beds
10 metres from classroom wall
Low pressure “oil”?
Pipeline markers
“Warning: Highly flammable products @ 1,200 psi”
Lack of awareness @ HPS

a. Veteran School Board trustee (18 years) had never heard of it, said there was no Board discussion.
b. Current Vice-principal said that staff could not recall any discussion re. PL (risks, procedures, etc): “Nobody heard of it.”
c. Kindergarten teacher (4 yrs) did not know of PL.
d. Previous principal: “… there was never any communication regarding safety/emergency plans. There was no communication whatsoever when I was Principal at that location.”
e. Former HPS student (5 yrs): “Students were never told… I don’t think the teachers even knew… my parents don’t know.”
Pipeline marker is concealed
Topography @ Emery
Fountainhead topography
Open stairwell: Yonge & Bishop
TTC’s concerns

• “Neither the TTC, Toronto Fire Services, nor Enbridge appear to have any specific contingency plan to manage a leak of petroleum should this occur near the TTC entrances.

• The top stair of the Bishop Avenue stairwell is at grade and provides no barrier to the flow of the product should there be a release.

• If any petroleum product was discharged either down the stairs or the escalators, or by other routes into the TTC concourse, platform or track level, there would be an enormous risk to thousands of daily passengers and TTC workers.”

Toronto’s Evidence to NEB, p. 7 (Aug. 2013, emphasis added)
The Union’s Health & Safety representative had never heard of any pipeline at the Finch subway:
“Nobody knew about it until you brought it to our attention.”
Yonge Street condo: 22 storeys
12 storey seniors’ condo: Scarborough
San Bruno Fire Chief 'Just Didn't Know about' Pipeline

Second day of federal safety hearing focuses on lack of awareness of underground pipelines

by John Upton — March 2, 2011, 5:43 p.m.  0

WASHINGTON, D.C.—San Bruno's fire chief said Wednesday that he had no idea a high-pressure gas pipeline passed underneath his city until it exploded last year, killing eight people.
To summarize federal requirements:

Companies must take all reasonable steps to inform anyone who is exposed to the risks, notably first responders and people living adjacent to the pipeline, of:

- Location of pipeline
- Potential emergencies
- How to respond.
Three concerns:

- Pipeline companies are not complying with federal regulations.
- NEB is similarly failing to check and enforce.
- The result is that people at high-consequence sites are at risk (yet many/most of them are unaware).
Emergency planning

- Need for a *site-specific* emergency plan at each HCS.
- *Electrical devices* may not be used when hydrocarbon vapours are present: fire alarm, telephone, elevator, etc.
- People need to know what to do/not do, especially “do not create a spark.”
Bellingham, WA: June 10/99
Preventing more HCSs

- Companies need to express safety concerns when an HCS is proposed next to their pipeline.
- Planners trust that safety concerns will be shared with them.
- Toronto planner re. 12 storey seniors condo: “the development [of this facility] is good planning.”
- Firefighters disagree. We should, also.