June 8, 2017

Dear [redacted]

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act [Our File #: SNL-042-2017]

On May 11, 2017, Service NL received your request for access to the following records/information:

“I am requesting information concerning the Granite Canal Hydroelectric Site, with a particular focus on Occupational Health and Safety ("OHS") orders, inspection reports and correspondence. This request is [redacted] Specifically, I am requesting Orders 661639 and 661686, and any inspection reports, associated orders or correspondence relating to these orders or any other related orders. Thank you.”

I am pleased to inform you that a decision has been made by Service NL to provide access to some of the requested information. Access to specific lines of text contained within the responsive documents that would reveal personal information if disclosed has been refused. This is in accordance with the following exception to disclosure, as specified in the Access to Information and Protection of Privacy Act (the Act):

Section 40(1): “The head of a public body shall refuse to disclose personal information to an applicant where the disclosure would be an unreasonable invasion of a third party’s personal privacy.”

As required by 8(2) of the Act, we have severed information that is unable to be disclosed and have provided you with as much information as possible. In accordance with your request for a copy of the records, the appropriate copies have been enclosed.

Please be advised that you may appeal this decision and ask the Information and Privacy Commissioner to review the decision to provide partial access to the requested information, as set out in section 42 of the Act (a copy of this section of the Act has been enclosed for your reference). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner. Your appeal should identify your concerns with the request and why you are submitting the appeal.

The appeal may be addressed to the Information and Privacy Commissioner as follows:

Office of the Information and Privacy Commissioner

P.O. Box 8700, St. John’s, NL, Canada A1B 4J6 Telephone 709.729.7437 Fax 709.729.4754
You may also appeal directly to the Supreme Court Trial Division within 15 business days after you receive the decision of the public body, pursuant to section 52 of the Act (a copy of this section of the Act has been enclosed for your reference).

Please be advised that responsive records will be published following a 72 hour period after the response is sent electronically to you or five business days in the case where records are mailed to you. It is the goal to have the responsive records posted to the Completed Access to Information Requests website within one business day following the applicable period of time. Please note that requests for personal information will not be posted online.

If you have any further questions, please contact me by telephone at 709-729-7437 or by email at ellenhaskell@gov.nl.ca.

Sincerely,

ELLEN HASKELL
ATIPP Coordinator

Enclosures
Access or correction complaint (Section 42)

42. (1) A person who makes a request under this Act for access to a record or for correction of personal information may file a complaint with the commissioner respecting a decision, act or failure to act of the head of the public body that relates to the request.

(2) A complaint under subsection (1) shall be filed in writing not later than 15 business days

   a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

   b) after the date the head of the public body is considered to have refused the request under subsection 16 (2).

(3) A third party informed under section 19 of a decision of the head of a public body to grant access to a record or part of a record in response to a request may file a complaint with the commissioner respecting that decision.

(4) A complaint under subsection (3) shall be filed in writing not later than 15 business days after the third party is informed of the decision of the head of the public body.

(5) The commissioner may allow a longer time period for the filing of a complaint under this section.

(6) A person or third party who has appealed directly to the Trial Division under subsection 52 (1) or 53 (1) shall not file a complaint with the commissioner.

(7) The commissioner shall refuse to investigate a complaint where an appeal has been commenced in the Trial Division.

(8) A complaint shall not be filed under this section with respect to

   a) a request that is disregarded under section 21;

   b) a decision respecting an extension of time under section 23;

   c) a variation of a procedure under section 24; or

   d) an estimate of costs or a decision not to waive a cost under section 26.

(9) The commissioner shall provide a copy of the complaint to the head of the public body concerned.

Direct appeal to Trial Division by an applicant (Section 52)

52. (1) Where an applicant has made a request to a public body for access to a record or correction of personal information and has not filed a complaint with the commissioner under section 42, the applicant may appeal the decision, act or failure to act of the head of the public body that relates to the request directly to the Trial Division.

(2) An appeal shall be commenced under subsection (1) not later than 15 business days

   a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

   b) after the date the head of the public body is considered to have refused the request under subsection 16 (2).

(3) Where an applicant has filed a complaint with the commissioner under section 42 and the commissioner has
refused to investigate the complaint, the applicant may commence an appeal in the Trial Division of the decision, act or failure to act of the head of the public body that relates to the request for access to a record or for correction of personal information.

(4) An appeal shall be commenced under subsection (3) not later than 15 business days after the applicant is notified of the commissioner's refusal under subsection 45 (2).
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

Toll Free: 1-800-563-5471
Accident Reporting: 729-4444

INSPECTION / OFFICER'S REPORT

EAST COAST CATERING LTD / O'CA
30 QUEENS ROAD
ST. JOHN'S
NL

Firm #: 2630
WCC #: 614432
Tel: 709-576-1741
Fax: 709-576-1742

A1C-2A5
Worksite: Maritime Link Project
Location: Granite Canal, NL

Employer Co-Chair: N/A
Employee Co-Chair: N/A
Worker Rep/Designate: [Redacted]

Employees: 6
NIC: 9214
Insp. Time: 10:20AM

REPORT:

Arrived on site with fellow OHS Officer Aiden Browne and met with Chef Manager [Redacted] and Water Treatment Operator [Redacted] to conduct an inspection. 

At the time of the inspection, there was very little activity at the site as construction activities related to the work of Marine Contractors has been suspended by Emera. Blackstar has also been contracted by Emera to perform tree clearing work at the site but at the time of the inspection, there were no workers employed by Blackstar at the site (away from site on time off). As a result of the work suspension and work schedules there are only East Coast Catering workers at the site at this time. The low number of workers has resulted in less activity occurring at the camp and surrounding site.

Today's inspection included the water and sewer treatment facility and a discussion around the emergency response plan. There is a paramedic at the site and workers advise that there is a plan to contact air ambulance in the event of any life threatening emergency. Fire Wardens have been assigned and a fire drill has recently been conducted. However, workers at the site inform that they have not been trained in fire fighting procedures and the nearest fire department is several hours away (Millertown). The current plan is to evacuate the camp in the event of a fire. [Redacted] advised that Fire and Emergency Services personnel had recently been at the site to discuss issues related to emergency response. It became apparent during the inspection that workers at the site have not been trained in the use of fire extinguishers.

Orders attached.

Received By: 
Date: MAY 17, 2017
Position: 
Time: 10:17AM

Officer's Name: Roberts, Welson

Browne, Aiden

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

ORDER FORM

Toll Free: 1-800-563-5471

EAST COAST CATERING LTD / O’CA
30 QUEENS ROAD
ST. JOHN’S
NL

Firm #: 2630
WCC #: 614432
Tel : 709-576-1741
Fax : 709-576-1742

A1C-2A5

Reference #: 0661639
SEP 10, 2015

TAKE NOTICE THAT YOU ARE TO COMPLY WITH THE FOLLOWING ORDER(S) ISSUED UNDER AUTHORITY OF THE OCCUPATIONAL HEALTH AND SAFETY ACT, REVISED STATUTES OF NEWFOUNDLAND AND LABRADOR 1990, CHAPTER 0-3 AS AMENDED AND REGULATIONS PASSED PURSUANT THERETO.

ORDER: 0661639- 01

REGULATION: Part V - General Health & Safety Require
38 2- Emergency plan risk assessment

Where the risk assessment required by subsection (1) shows a need for evacuation or rescue, appropriate written procedures shall be developed and implemented and a worker assigned to coordinate their implementation.

TO WIT:

The employer shall provide documentation to the undersigned officer which indicates that the Emergency Response Plan for this site (ENL Document No.: D-00HS-0-700-00-021) has been reviewed by Fire and Emergency Services. Any recommendations that come from the review shall be forwarded to the OHS Division.

This Order shall be carried out on or before: DEC 31, 2015

Extension: 2

ORDER: 0661639- 02

REGULATION: Part V - General Health & Safety Require
41 1- Emergency training

A worker shall be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to his or her workplace.

TO WIT:

The employer shall ensure that all of its workers at this site that may be required to use a fire extinguisher attend a training session in the proper use of fire extinguishers.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
ORDER FORM

This Order shall be carried out on or before: NOV 17, 2015
Extension: 2

ORDER: 0661639-03

REGULATION: Part V - General Health & Safety Require
41 1- Emergency training

A worker shall be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to his or her workplace.

TO WIT:

Following the review of Emergency Response Plan by Fire and Emergency Services, the employer shall ensure that all of its workers at this site are made aware of the plan and their role in it.

This Order shall be carried out on or before: DEC 31, 2015
Extension: 2

ORDER: 0661639-04

REGULATION: Part VI - Occupational Health Requirements
63 -c Emergency washing facilities

An employer shall ensure that access to emergency eyewash and shower facilities is not blocked by material or equipment; and

TO WIT:

The employer shall assess the access to all of its emergency eye wash stations at this site as a means of ensuring that the access is not blocked. Noted at the time of the inspection is a blocked emergency eye wash station in the water treatment building.

This Order shall be carried out on or before: SEP 17, 2015

ORDER: 0661639-05

REGULATION: Part VII - Personal Protective Equipment
85 1- Respiratory protection equipment

An employer shall select and provide appropriate respiratory protection equipment based on the respiratory hazard to which a worker is exposed and workplace and user factors that affect the performance and reliability of the equipment.

TO WIT:

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
ORDER FORM

The employer shall conduct a review of the Material Safety data Sheets for controlled products used in the water/waste water treatment processes as a means of determining the required type of respiratory protection equipment. Appropriate respiratory protection equipment shall be provided based upon the review. Noted at the time of the inspection is that P100 particulate cartridges are being used for protection against the inhalation of chemicals.

This Order shall be carried out on or before: SEP 30,2015

ORDER: 0661639- 06

REGULATION: Part VII - Personal Protective Equipment
83 - Respiratory protection program

Where required, an employer shall establish, implement and maintain, and revise where necessary, a written respiratory protection program in accordance with CSA Standard Z94.4 "Selection, Use and Care of Respirators".

TO WIT:

The employer shall ensure that all of its workers at this site that are required to wear a respirator pass a fit test for the type of respirator being worn. Additionally, the employer shall ensure that respirators are stored away from sources of contamination when they are not in use.

This Order shall be carried out on or before: SEP 30,2015

YOU ARE TO NOTIFY THE INSPECTOR IN WRITING UPON COMPLIANCE. FAILURE TO COMPLY WITH THE ABOVE ORDER(S) IS AN OFFENCE UNDER SECTION 67 OF THE OCCUPATIONAL HEALTH AND SAFETY ACT, RSNL 1990, CHAPTER 0-3 AS AMENDED.

AN ORDER MADE BY AN OFFICER MAY BE APPEALED, IN WRITING, TO THE ASSISTANT DEPUTY MINISTER WITHIN 7 DAYS OF THE ORDER.

Received By:                      Return Address:

Position:                      Provincial Bldg, Cromer Ave

Officer's Name:               Grand Falls, NL, A2A 1W9

                                    Fax: (709) 292-4430

                                    Date: MAY 17,2017

                                    Time: 10:18AM

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

INSPECTION / OFFICER'S REPORT

Toll Free: 1-800-563-5471
Accident Reporting: 729-4444
Reference #: 0661686
Inspection: JAN 29, 2016
May 17, 2017

EAST COAST CATERING LTD / O'CA
30 QUEENS ROAD
ST. JOHN’S
NL

Firm #: 2630
WCC #: 614432
Tel: 709-576-1741
Fax: 709-576-1742

A1C-2A5

Worksite: Maritime Link Project
Location: Granite Canal, NL
Employer Co-Chair: [Redacted]
Employee Co-Chair: [Redacted]
Worker Rep/Designate: N/A

Employees: 6
NIC: 9214
Ins. Time: 10:30 AM

REPORT:

Reference Inspection 661639

Arrived on site on January 29, 2016 with Fire Protection Officer Linus Tremblett (Fire and Emergency Services) to conduct a follow-up to order 661639 - 01 [review of Emergency Response Plan (ERP) by Fire and Emergency Services] and 661639 - 02 (training in ERP). We were joined on the site by [Redacted] both with Emera and met with Camp Manager [Redacted] at the time of the inspection there were six workers at the site including water treatment operator, kitchen staff and a nurse. It is expected that the numbers of workers at the site will ramp up in the near future as transmission line and switchyard construction activities increase.

The inspection revealed that there is no fire department response for the site despite references in the emergency response plan to a fire department. There is a dry hydrant at the site meant for drafting water from the canal water supply with a fire truck but there is no fire truck. There is presently no means at the site of supplying water for fire suppression. There is a potable water supply at the site and water in the hydro canal but no means of connecting either supply to a fire suppression system (i.e. no connecting devices, no hoses, no portable pumps, etc.). In the event that a person becomes trapped in a dorm room and fire wardens are unable to get to the dorm room from the inside, there is a plan to place a portable ladder to the dorm room window from the outside to rescue the worker. This rescue procedure is not identified in the emergency response plan. [Redacted] state that the focus of the plan to date has been to evacuate workers from the camp in the event of an emergency.

The inspection also revealed that several self-closing fire rated doors were blocked open in a manner that would allow smoke or fire to travel unimpeded from the kitchen unit to the dorm rooms. Blocking the doors in this manner takes away the fire rating of the various building areas. At least one exit door does not have panic hardware installed and is locked. The door for the main electrical room in the dorms does not have a self closing device installed. There is an opening in the electrical room wall where conduits pass through the wall. The building is equipped with a fire alarm system but an inspection report for the system is not available.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
Serviced fire extinguishers are available and workers have been trained in the use of fire extinguishers. The Company reports that emergency lighting, first aid kits, eye wash stations and exits are checked on a regular basis. Additionally, [ ] state that all high risk activities stop during periods of adverse weather where emergency evacuation by air or road transportation may not be possible (e.g. severe winter storms). The ERP makes reference to the use of a road ambulance service but other details around the service are unclear (where located, response time, contact numbers, etc). The plan does not address any need for an emergency transportation vehicle located at the site.

No orders are issued by the undersigned officer for deficiencies identified in the above paragraphs as Mr Tremblett will be issuing a report to address these deficiencies. However, the undersigned officer is requesting that the emergency response plan be updated to reflect plans for fire suppression with water, rescue, and emergency road transportation (including dedicated emergency transportation vehicle). The revised ERP shall also address any deficiencies identified in [Mr. Tremblett's report]. A copy of the updated plan shall be forwarded to the undersigned officer along with confirmation that workers have been trained in the new plan.

No new orders issued.

Received By: ___________________________ Date: MAY 17, 2017
Position: ___________________________ Time: 10:18 AM
Officer's Name: ___________________________ Roberts, Welson

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
Welson and Aiden,

In response to the orders that were issued following your above referenced inspection, we have the following updates to provide:

**Order 0661639-01:**
We have made contact with Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, and forwarded him a copy of ECC's Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) as well as copies of the last two dry-run fire drill reports. Mr. Hogan has confirmed receipt and agreed to review the document in detail and provide appropriate feedback. In addition, he has indicated that he is hoping to visit our site in the coming weeks. I will provide an update once I have received feedback from Mr. Hogan.

**Order 0661639-02:**
During my discussion with Mr. Hogan, I advised that while we have posted (the attached) signage next to each of the 30+ fire extinguishers on site (as well as copies being included with the Camp Rules that are distributed to all residents), we have not provided any formal training on the proper use of fire extinguishers to our staff. Mr. Hogan advised that he would certainly be able to assist with this, and could even possibly provide the training himself during his upcoming visit(s) to site.

**Order 0661639-03:**
ECC will be addressing all feedback received from Fire and Emergency Services, following their review of our ERP. Once the associated action items (if any) have been implemented and the plan updated accordingly, ECC will be utilizing our Site Medic (and ERP Coordinator) to perform training sessions with all staff to ensure that all are aware of their respective roles in the event of an emergency.

**Order 0661639-04:**
All emergency eye wash stations have been assessed and confirmed to be easily accessible. The clutter which was blocking the water treatment building eye wash station at the time of your inspection has since been removed. Please see attached photo.

**Order 0661639-05:**
The Material Safety Data Sheets for all chemicals being used on site have been reviewed and the appropriate respiratory protection equipment identified (Full Face 3M 6000 series masks with 3M combination filters, Product Code: 0923 Classification OV/AG/P100 - Organic vapours, acid gases and particulates). This PPE will be purchased and issued to the workers once the appropriate fit testing has been completed in accordance with Order 06 below.

**Order 0661639-06:**
I have confirmed that Rogers Enterprises has qualitative fit testing services available at their location in Grand Falls (and waiting to see about Corner Brook area). I will provide an update once we have scheduled fit testing for all applicable
workers. After that, I will follow up with evidence of the completed fit testing, as well as the proper issue and storage of the associated respiratory protection equipment.

If you have any questions or comments, please do not hesitate to contact me directly. Trusting this is satisfactory...

Best regards,

Section 40(1)

Section 40(1)

Section 40(1)

Section 40(1)

Safety and Satisfaction... Our Commitment to Those We Serve
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Good morning

Thanks for the update. Order 0661639-04 is closed. Please provide a further response to the remaining open orders by the Compliance Date listed for each order.

If you have any questions or comments, please get in touch.

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430

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Welson and Aiden,

In response to the orders that were issued following your above referenced inspection, we have the following updates to provide:

**Order 0661639-01:**
We have made contact with Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, and forwarded him a copy of ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) as well as copies of the last two dry-run fire drill reports. Mr. Hogan has confirmed receipt and agreed to review the document in detail and provide appropriate feedback. In addition, he has indicated that he is hoping to visit our site in the coming weeks. I will provide an update once I have received feedback from Mr. Hogan.

**Order 0661639-02:**
During my discussion with Mr. Hogan, I advised that while we have posted (the attached) signage next to each of the 30+ fire extinguishers on site (as well as copies being included with the Camp Rules that are distributed to all residents), we have not provided any formal training on the proper use of fire extinguishers to our staff. Mr. Hogan advised that he
would certainly be able to assist with this, and could even possibly provide the training himself during his upcoming visit(s) to site.

Order 0661639-03:
ECC will be addressing all feedback received from Fire and Emergency Services, following their review of our ERP. Once the associated action items (if any) have been implemented and the plan updated accordingly, ECC will be utilizing our Site Medic (and ERP Coordinator) to perform training sessions with all staff to ensure that all are aware of their respective roles in the event of an emergency.

Order 0661639-04:
All emergency eye wash stations have been assessed and confirmed to be easily accessible. The clutter which was blocking the water treatment building eye wash station at the time of your inspection has since been removed. Please see attached photo.

Order 0661639-05:
The Material Safety Data Sheets for all chemicals being used on site have been reviewed and the appropriate respiratory protection equipment identified (Full Face 3M 6000 series masks with 3M combination filters, Product Code: 0923 Classification OV/AG/P100 - Organic vapours, acid gases and particulates). This PPE will be purchased and issued to the workers once the appropriate fit testing has been completed in accordance with Order 06 below.

Order 0661639-06:
I have confirmed that Rogers Enterprises has qualitative fit testing services available at their location in Grand Falls (and waiting to see about Corner Brook area). I will provide an update once we have scheduled fit testing for all applicable workers. After that, I will follow up with evidence of the completed fit testing, as well as the proper issue and storage of the associated respiratory protection equipment.

If you have any questions or comments, please do not hesitate to contact me directly. Trusting this is satisfactory....

Best regards,
From: [redacted]@eccltd.ca
Sent: Tuesday, September 29, 2015 11:01 AM
To: Roberts, Welson
Subject: RE: Emergency Response Plan for Emera NL's Granite Canal Camp

Thank-you very much, Welson.

Best regards,

-----

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: September-29-15 10:44 AM
To: [redacted]; Hogan, Blair
Cc: [redacted]; @emera.com; Browne, Aiden
Subject: RE: Emergency Response Plan for Emera NL's Granite Canal Camp

Good Morning

Thanks for the update. Orders 661639-01, 02, 03 are extended until Oct 31, 2015.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@eccltd.ca
Sent: Monday, September 28, 2015 4:24 PM
To: Hogan, Blair; Roberts, Welson
Cc: [redacted]; @emera.com
Subject: RE: Emergency Response Plan for Emera NL's Granite Canal Camp

Thanks for the update, Blair.

Welson,

As per the below update, would it be possible to get an extension on Order #’s 0661639-01, 0661639-02 and 0661639-03?

Best regards,
From: Hogan, Blair [mailto:BlairHogan@gov.nl.ca]
Sent: September-28-15 4:17 PM
To: [redacted]
Cc: [redacted]; ECC Granite Lake Manager; [redacted]; Roberts, Welson; [redacted]
Subject: Re: Emergency Response Plan for Emera NL's Granite Canal Camp

Hi [redacted]

I have met and discussed the info provided by yourself with the Emergency Services side of the FES-NL shop. The documents also has to go through the Fire Protection side. This may not happen by October 1st. It may be prudent to asked for an extension from OH&S.

Blair

Sent from my BlackBerry 10 smartphone on the Bell network.

From: [redacted]
Sent: Friday, September 25, 2015 3:35 PM
To: Hogan, Blair
Cc: [redacted]; ECC Granite Lake Manager; [redacted]; Roberts, Welson; [redacted]
Subject: Re: Emergency Response Plan for Emera NL's Granite Canal Camp

Much appreciated, Blair! Have a great weekend...

[redacted]

On Sep 25, 2015, at 3:28 PM, Hogan, Blair <BlairHogan@gov.nl.ca> wrote:

Hi [redacted]

The review of the material is now before the Director of Emergency Services at FES-NL. The is the protocol established by Management.

I will see the Director on Monday and will have a further update for you by mid morning.

Sincerely

Blair
Sent from my BlackBerry 10 smartphone on the Bell network.

Good morning Blair...

Just touching base to see if you have made any progress in reviewing the below mentioned ERP for Granite Canal? We have been given a deadline by OH&S to close out these orders by September 30th. If you anticipate any delays, please advise so that I can provide Welson Roberts (OH&S Officer) with an update.

On a related note, myself and [redacted] will be out on site all day on October 14th...just giving you a heads up in case you might be in the area and want to stop by for a tour of the facilities and lunch.

Thanks again and all the best!

---

From: Hogan, Blair [mailto:BlairHogan@gov.nl.ca]
Sent: September-15-15 12:32 PM
To: [redacted]
Cc: ECC Granite Lake Manager
Subject: RE: Emergency Response Plan for Emera NL's Granite Canal Camp

Confirming receipt of your email. I will be back in the office on Friday whereby I will fully review the attached files and information.

Sincerely,

Blair Hogan, B.M.&A.B.
Regional Emergency Management Planning Officer

Government of Newfoundland and Labrador
From: [Email redacted]@ecc ltd. ca
Sent: Tuesday, September 15, 2015 10:24 AM
To: Hogan, Blair
Cc: [Email redacted] ECC Granite Lake Manager
Subject: Emergency Response Plan for Emera NL’s Granite Canal Camp
Importance: High

Good morning Blair,

As per yesterday's discussion, attached for your review is our Emergency Response Plan (ERP) D-000HSD-0-700-00-021 for the 100-person Accommodations Facility located at Granite Canal. In response to the OH&S Inspector's order, resulting from the Sep 10 inspection, we have been directed to provide our ERP to Fire and Emergency Services for review. Any resultant recommendations shall then be forwarded to the OHS Division for follow-up implementation. I have also attached the reports that came from our two dry-run emergency drills. Essentially, East Coast Catering's involvement during an emergency evacuation is to ensure that all residents evacuate the camp and muster at the assigned area(s). Any significant fire-fighting elements would be handled by Fire and Emergency Services. We have a full-time medic on staff who acts as the ERP Coordinator and the Communications Coordinator is our Chef Manager, who is also full time. There is one (1) Fire Warden assigned to each of the two dorms (if camp population exceeds 50 persons, otherwise only 1 dorm will be occupied). While Emergency Responders are mentioned in the plan, they would only apply in the absence of the site Medic, which we don't anticipate to be likely to occur, however we have included this element as a contingency.

In addition to the above, we have approximately 30 fire extinguishers located throughout the facility. Each one has a laminated sign posted directly adjacent (attached) which provides basic instructions, with illustrations, on the proper operation of a fire extinguisher. Copies of this can also be found as an appendix to the Camp Rules (also attached), which is provided to every resident upon check-in. Residents and employees are instructed not to attempt to use a fire extinguisher unless they are comfortable with doing so and the situation does not place them at further risk. Subsequent to the above-mentioned OH&S Inspection, we have been tasked with providing training on the proper use of fire extinguishers to all workers that may be required to use one. While we do have a number of management and staff who have received Basic Survival Training and/or First Responder (Advanced First Aid) Training, who could provide this training in-house, we would prefer to have it completed by a certified trainer or similar accredited individual of your recommendation. During our discussion you had mentioned that you could assist in facilitating this, and I would gladly take you up on that offer. Please let me know how we can proceed with scheduling this at your earliest convenience.

You also mentioned that you were hoping to make a trip out that way in the coming weeks. If you were, we would be thrilled if you could make a quick visit to our site! Given the remote nature of this site (~80 km SW of the Millertown Highway / Beothuck Road intersection), we feel it would be extremely beneficial to establish and maintain a close relationship with you and your associates and would really appreciate any support/feedback that you might have to offer. Myself and Isaac are actually planning a site visit for the week of October 5th (tentative)...when was it that you thought you were going to be in the area? It would be convenient (however not essential) if we were all on site at the same time.
Thanks again for your help, Blair. If you have any questions, please don't hesitate to contact me directly. I have copied our Operations Manager on this email as he is the ECC management representative directly responsible for this camp. I have also included our Chef Managers on this correspondence, to keep them in the loop.

Best regards,

---

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Thank-you, Welson... I will advise once receipt on site has been confirmed.

Best regards,

On Sep 29, 2015, at 1:14 PM, Roberts, Welson <welsonroberts@gov.nl.ca> wrote:

Thanks Order 661639 – 05 is closed. I await the final response to order 661639 – 05.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Good morning, Welson.

Regarding orders 661639 – 05 and 661639 – 06, both workers have completed qualitative fit testing for the 3M 6800 series respirators and we have since purchased two size medium respirators (+ 5 pkgs of MMM60923 filters) through Acklands Grainger, currently in transit and due to arrive on site this Thursday.

I will provide an update once I have confirmed that the respirators are indeed on site.

Best regards,
Good Morning

Please provide an update to orders 661639-05 and 661639-06. I am wondering if the respirators are available and whether the fit testing has been completed.

Welton Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [Redacted]@eccltd.ca
Sent: Thursday, September 17, 2015 1:06 PM
To: Browne, Aiden; Roberts, Welton
Cc: [Redacted]
Subject: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Welton and Aiden,

In response to the orders that were issued following your above referenced inspection, we have the following updates to provide:

**Order 0661639-01:**
We have made contact with Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, and forwarded him a copy of ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) as well as copies of the last two dry-run fire drill reports. Mr. Hogan has confirmed receipt and agreed to review the document in detail and provide appropriate feedback. In addition, he has indicated that he is hoping to visit our site in the coming weeks. I will provide an update once I have received feedback from Mr. Hogan.

**Order 0661639-02:**
During my discussion with Mr. Hogan, I advised that while we have posted (the attached) signage next to each of the 30+ fire extinguishers on site (as well as copies being included with the Camp Rules that are distributed to all residents), we have not provided any formal training on the proper use of fire extinguishers to our staff. Mr. Hogan advised that he would certainly be able to assist with this, and could even possibly provide the training himself during his upcoming visit(s) to site.

**Order 0661639-03:**
ECC will be addressing all feedback received from Fire and Emergency Services, following their review of our ERP. Once the associated action items (if any) have been implemented and the plan updated accordingly, ECC will be utilizing our Site Medic (and ERP Coordinator) to perform training sessions with all staff to ensure that all are aware of their respective roles in the event of an emergency.
**Order 0661639-04:**
All emergency eye wash stations have been assessed and confirmed to be easily accessible. The clutter which was blocking the water treatment building eye wash station at the time of your inspection has since been removed. Please see attached photo.

**Order 0661639-05:**
The Material Safety Data Sheets for all chemicals being used on site have been reviewed and the appropriate respiratory protection equipment identified (Full Face 3M 6000 series masks with 3M combination filters, Product Code: 0923 Classification OV/AG/P100 - Organic vapours, acid gases and particulates). This PPE will be purchased and issued to the workers once the appropriate fit testing has been completed in accordance with Order 06 below.

**Order 0661639-06:**
I have confirmed that Rogers Enterprises has qualitative fit testing services available at their location in Grand Falls (and waiting to see about Corner Brook area). I will provide an update once we have scheduled fit testing for all applicable workers. After that, I will follow up with evidence of the completed fit testing, as well as the proper issue and storage of the associated respiratory protection equipment.

If you have any questions or comments, please do not hesitate to contact me directly. Trusting this is satisfactory...

Best regards,

[Redacted]

<image003.png>

Safety and Satisfaction... Our Commitment to Those We Serve

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Blair Hogan, B.M.&A.B.
Regional Emergency Management Planning Officer
Fire and Emergency Services – Newfoundland & Labrador
Provincial Building, 3 Cromer Avenue
Grand Falls-Windsor, NL A2A 1W9
(o) 709.292.4078
(f) 709.292.4415
(e) BlairHogan@gov.nl.ca

October 5th 2015

RE: Fire and Emergency Services – Newfoundland & Labrador (FES-NL) review of East Coast Catering Limited’s Emergency Response Plan (ERP) D-000HS-0-700-00-021 for the 100-person Accommodations Facility located at Granite Canal. This is in response to the OH&S Inspector’s Orders 661639 – 01, 02, 03, resulting from the Sep 10th 2015 inspection. East Coast Catering Limited have been directed to provide their ERP to Fire and Emergency Services – Newfoundland & Labrador for review.

Index - If document will be circulated to or used by external entities, it may be warranted to spell out acronyms first time they are used (i.e. 4.2 HSEQ Manager).

Page 1 - Should “response” be included in the first line in front of plan?

Page 1, 3, EM - Recommend to place “Mitigate” before “Prepare for” as the 4 Pillars are: mitigation, preparedness, response and recovery.

Page 3 - R.A.C.E. is the more commonly used versus the R.E.A.C.T. acronym. R.A.C.E.

Remove: Remove all endangered persons
Alert: Alert those around to the fire
Contain the fire: Close all doors, windows and other openings
Evacuate/Extinguish: Leave the area or extinguish if possible

Page 4 - In the flow chart, recommend adding “911” under Local Emergency Services.
Page 7 - Those designated as Fire Wardens carry handheld radios. Is there a specific “channel” they can be reached on? If so, it should be listed.

Page 8 - Please confirm and test that there is no 911 service via any means (i.e. cell phone, or landline). Is it possible that 911 operators can be reached, if so then it should be listed accordingly? If no possibility, then this information warrants being mentioned earlier in the document.

Has Buchans Junction Fire Department agreed via M.O.U. or similar to respond to Granite Canal? If so, what level of response can they provide?

Recommend not utilizing names if possible but utilizing positions only.

The provincial Emergency Measures Organization is legislatively recognized as Fire and Emergency Services – Newfoundland & Labrador (FES-NL). All references in the document to Emergency Measures Organization warrants being replaced with Fire and Emergency Services – Newfoundland & Labrador (FES-NL).

Department of Government Services is legislatively recognized as Service NL and all references should be replaced accordingly.

Environmental Emergencies does not appear to have a complete phone number. Consider Department of Environment and Conservation as the provincial contact for such.

NLCSA acronym warrants being spelled out.

Page 9 - Should these forms be readily available outside the Emergency Response Plan? If so, please indicate where they may be available.

Page 11 - Consideration should be given to an alternate Muster Point.

Page 16 - R.E.A.C. T. vs. R.A.C.E as mentioned above.

Page 19 - In addition to the word “competent” consider utilizing the word “and trained.”

Under Pre-planning Considerations; if the local volunteer fire department do not have a hazardous material response team, then this warrants not being referenced or mentioned at all in this section or in the document.

Page 21 - Considering changing “Ambulatory Care” to just via Ambulance.

Page 22 - If there is no cell phone service on the site, then consider removing it under pre-planning consideration.

Page 24 - Should there be any additional handling of a suspicious packaged. Warrants following up with closest R.C.M.P. Detachment for clarification.
Consider "slurred" instead of "drunk."

Would candles be used at a commercial site?

What can Buchan's Junction Fire Department do to assess structural building damage?

ERP – consider adding "After each significant test and or use of the emergency response plan; these procedures will be evaluated to determine areas of weakness."

Consider adding "After each significant test and or use of the emergency response plan; these procedures will be evaluated to determine areas of weakness."

Questioning the Mutual Aid component and if it was considered? This may warrant more clarification.

This concludes Fire and Emergency Services – Newfoundland & Labrador's review of East Coast Catering Limited's Emergency Response Plan (ERP) D-000HS-0-700-00-021 for the 100-person Accommodations Facility located at Granite Canal. All suggestions, recommendations and considerations made herein this document by FES-NL has been made to fulfill the FES-NL review requirement as indicated in OH&S Inspector's Orders 661639 – 01, 02, 03.
Good morning [redacted] and Wilson,

Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

[redacted]

---

Thanks

---

Hi [redacted]

Status of Orders are as follows:

Order 0661639-01:
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31st, 2015.

Order 0661639-02:
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

Order 0661639-03:
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

Order 0661639-04:
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21st.

**Order 0661639-05:**
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29th and were due to arrive on site October 1st. Upon follow-up with site it was determined that they had not yet been delivered. On October 2nd, Acklands Grainger contacted [Redacted] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” – and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

**Order 0661639-06:**
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29th.

I will update you tomorrow once we have a response on the status of #05.

---

From: [Redacted]@emera.com
Sent: October-05-15 2:48 PM
To: [Redacted]
Cc: [Redacted]
Subject: FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi [Redacted] can you please provide a status update on all ECC OHS Orders?

Thanks,
Hi Wilson,

We are having some difficulties procuring a fire extinguisher training provider that is handy to the Granite Canal Camp. I was wondering if it would suffice if we provided this training in-house? I have located the following YouTube video online, which we could review with all staff and implement an acknowledgement sign-off sheet and incorporate this into our site training matrix:

https://www.youtube.com/watch?v=ktrv34zW7-A

If you are aware of any more appropriate training materials, by all means please advise. We have reached to the Buchans Fire Dept and they are unable to provide this training, nor have we had much success with Fire and Emergency Services or the NL Association of Fire Services; both suggesting that we utilize in-house electronic (video/PoworPoint) options, given the nature of our site. As you are aware, we currently have the PASS signage (attached) posted next to each extinguisher on site, and have listed in the camp rules (for which this poster is an appendix) that if you are not comfortable using a fire extinguisher not to even attempt to use one.

Your guidance would be greatly appreciated. On a related note, we are currently updating our ERP to reflect Fire and Emergency Services’ recent feedback and expect to have this completed early next week.

Thanks in advance,

Hi

Speaking with my colleagues re: Fire Extinguisher training – first step would be to contact the nearest Fire Department (Buchans Junction mentioned in your materials) and start the dialogue there to see if they can assist. Another alternative is to look at contacting the Newfoundland & Labrador Association of Fire Services to see if they can assist or recommend. There are electronic and simulator products that may be suitable and meet your on-site needs. The Region Health Authorities were researching electronic and simulator products to further enhance their Code Red – Fire emergency response protocols.

Sincerely,
Blair Hogan, B.M.&A.B.
Regional Emergency Management Planning Officer

Government of Newfoundland and Labrador
Fire and Emergency Services – Newfoundland & Labrador
Provincial Building, 3 Cromer Avenue
Grand Falls-Windsor, NL A2A 1W9
(o) 709.292.4078
(f) 709.292.4415
(e) BlairHogan@gov.nl.ca

From: [REDACTED]@ecdl.ca
Sent: Friday, October 16, 2015 9:03 AM
To: Hogan, Blair
Cc: [REDACTED]@ecdl.ca, Roberts, Welson
Subject: RE: Emergency Response Plan for Emera NL’s Granite Canal Camp

Thanks so much for your detailed review and feedback, Blair! No need to apologise for the delay...the more detailed the review the better! At a glance the comments received appears to be very supportive and certainly pertinent. We will now commence a detailed review of your recommendations, update our ERP and train all associated staff accordingly.

Myself and [REDACTED] just returned from visiting site last night and the Chef Manager had asked if we had anything to update with respect to training on proper fire extinguisher use. At this point, all untrained/uncomfortable staff have been instructed not to attempt to use a fire extinguisher until we can provide the appropriate training. Fortunately, we do have a number of staff who have received this training (former offshore workers w/ Basic Survival Training), so we are not overly deficient from an ER standpoint. That said, I was wondering what you might suggest in relation to this? Are you or any of your associates able to visit site to provide this training for our staff? If not, are you able to point us in the right direction? Perhaps a training video or similar would be appropriate?
Any suggestions would be appreciated.

Thanks again,

From: Hogan, Blair [mailto:BlairHogan@gov.nl.ca]
Sent: October-16-15 8:47 AM
To: [REDACTED]@ecdl.ca
Cc: [REDACTED]@ecdl.ca
Subject: Emergency Response Plan for Emera NL’s Granite Canal Camp

Hi [REDACTED]@ecdl.ca.

Apologize for delay in the receiving of this document. Program protocol establishes several/different sets of eyes reviewing the materials your provided. Please review the attached document and if you have any questions, please do not hesitate to contact myself either by email or phone.

Sincerely,

Blair Hogan, B.M.&A.B.
Regional Emergency Management Planning Officer
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Hi Welson:

Thank you for not forwarding on the e-mail below. I would definitely stand behind my evaluation, but would be a little more tactful in an e-mail intended for an external audience.

To sum up my overall evaluation, the document is much better than nothing, but if a real emergency occurs it would not provide the guidance or detail critically needed.

Good on you for checking into this aspect of their operations. I know this is fairly routine practice for both you and Darren when dealing with remote mining sites.

For a remote site a real weakness in appropriate emergency preparedness is evident.

John

John Morgan

OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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Thanks John. I appreciate your review. I just sent an email to East Coast Catering (ECC) which included some of your comments. Maybe we should put all comments in a document that can be forwarded to ECC and Emera. I was going to simply forward your email but of the wording is probably not appropriate.
Hi Welson:

I have read the document attached. I will start with the positive point, it meets the definition of an emergency response plan.

However, the document's content, and some of the guidance it provides, ranges from inadequate to very inadequate to unacceptable. I will list some specific examples below.

1. The document identifies that the MEDIC is the ERP coordinator who is the frontline person responsible for the management of an emergency. This is not appropriate or normally functionally possible as there is only one Medic. If there are ill or injured persons the Medic would have to deal with this aspect of the emergency and hence not be able to effectively manage the emergency response.
2. There is no critical supplies and equipment inventory.
3. There are no mutual aid agreements to specify the response to be provided by outside agencies.
4. The accepted incident command model does not appear to be utilized.
5. The document does not appear to be consistent with CSA Z703-3 or the "All Hazards Common Consequences" model of emergency management consistent with the Canadian Framework for Emergency Management. This is the nationally accepted model for emergency management.
6. The guidance for dealing with a mass/multiple casualty incident is totally unacceptable and essentially totally lacking in appropriate detail.
7. The guidance for dealing with a severe weather emergency is severely lacking to the point of being almost unacceptable.
8. The "crisis communications" guidance is severely lacking. AND
9. The guidance for emergency management exercise design is very lacking.

Regards,

John

John Morgan
OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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From: Roberts, Welson
Sent: Wednesday, October 28, 2015 2:34 PM
To: Browne, Aiden; Martin, Denis; Morgan, John
Cc: McCurdy, Darlene; Carter, Doug
Subject: FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Please see attached the Emergency Response Plan for East Coast Catering at the Granite Canal site. Also see attached some comments from FES concerning their review of the ERP. This is Emera's site and there are other contractors (such as Marine Contractors) that may have other emergencies (they work a fair distance away from the camp which is being operated by East Coast Catering). Should we be requesting an ERP from Emera? I think that we should be reviewing the plan as a group. I note that there is no list of equipment/resources in the plan and I have been told that the only firefighting equipment on the site is fire extinguishers. Keep in mind that this is a 100 man camp that is hours away from the nearest fire department (Buchans Jct). There is a paramedic employed on site but no emergency responders to a fire. The plan is to evacuate.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@eccltd.ca
Sent: Wednesday, October 28, 2015 12:38 PM
To: Roberts, Welson; Hogan, Blair
Cc: [redacted]@eccltd.ca
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Hi Welson,

As discussed, attached is our Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT for the Granite Canal Camp, revised to reflect the feedback received from Fire & Emergency Services (also attached).
As per my previous email, I will require clarification and/or suggestions regarding the training required for proper use of fire extinguishers. Also, as mentioned, there is no formal MOU in place between Emera NL and the Buchans Junction Volunteer Fire Department, simply a verbal agreement that they will respond in the event of an emergency.

Thanks again,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-08-15 3:32 PM
To: 
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update. Order 661639 - 05 is closed.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: 
Sent: Wednesday, October 07, 2015 4:09 PM
To: Roberts, Welson;
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Just a further update on the respirators... the WWTP Operator currently on site is now in possession of his respirator (it arrived on site yesterday evening). Myself and [redacted] will be heading to site on Tuesday, October 13th and will be hand-delivering the other WWTP Operator, [redacted] respirator. He is not due to return to site until October 19th.

Regards,
From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-06-15 1:05 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@emera.com
Sent: Tuesday, October 06, 2015 9:34 AM
To: Roberts, Welson
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good morning and Welson,

Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

From: [redacted]@eccltd.ca
Sent: October-05-15 8:20 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks

From: [redacted]@eccltd.ca
Sent: October-05-15 5:42 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi

Status of Orders are as follows:

Order 0661639-01:
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31\textsuperscript{st}, 2015.

**Order 0661639-02:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31\textsuperscript{st}, 2015.

**Order 0661639-03:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31\textsuperscript{st}, 2015.

**Order 0661639-04:**
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21\textsuperscript{st}.

**Order 0661639-05:**
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29\textsuperscript{th} and were due to arrive on site October 1\textsuperscript{st}. Upon follow-up with site it was determined that they had not yet been delivered. On October 2\textsuperscript{nd}, Acklands Grainger contacted [redacted] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” – and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

**Order 0661639-06:**
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29\textsuperscript{th}.

I will update you tomorrow once we have a response on the status of #05.

Thanks,

---

**From:** [redacted]@emera.com

**Sent:** October-05-15 2:48 PM

**To:** [redacted]

**CC:** [redacted]

**Subject:** FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi [redacted],

Can you please provide a status update on all ECC OHS Orders?

Thanks,

---

“This email and any attached files are intended for the sole use of the primary and copied addressee(s) and may contain privileged and/or confidential information. Any distribution, use or copying by any means of this
Thanks for the feedback, Welson... very valid points. What kind of approximate timeline are we looking at to complete this, would you say? You mentioned during our chat that these orders will need to been given extensions...

Regards,

---

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-28-15 4:05 PM
To: [redacted] Hogan, Blair; Browne, Aiden; McCurdy, Darlene; Carter, Doug; Martin, Denis; Morgan, John; Power, Loyola
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update...

I have forwarded the ERP and comments from Fire and Emergency Services (FES) to individuals within the OHS Division for review. I will provide further comments once this review is complete.

With respect to your question regarding fire extinguisher training, I believe that Martins Fire Safety (St. John's) offers a fire extinguisher training course. I also note that FES also offers a two day Defensive Firefighting course which includes training on portable extinguishers.

Required resources (such as firefighting equipment) and training needs should have been identified during the emergency plan risk assessment. Response times to emergencies should have also been considered during the risk assessment. The expected response time for local emergency responders is not identified in the ERP but this will undoubtedly have an impact on the level of resources and training required at the site. The impact that adverse weather and road conditions must also be considered during the risk assessment process. For instance, we know that the Buchans Jct Fire Department may take several hours to reach the site (even longer during a stormy winter night), but there does not seem to be a clear plan in place to deal with the situation of someone being unable to evacuate from a smoke filled or burning camp building. In this case, a rescue is required ASAP but it is not clear from the plan how this will take place. It is not even clear how evacuated workers will be dealt with if the evacuation occurs during a freezing, stormy winter night. During discussions it was stated that “people will do what they have to do to rescue someone”. This may be the case but there is likelihood in further escalating the emergency rather than resulting in a successful rescue. The whole purpose of an emergency response plan is to identify all potential emergencies (considering worst case scenario) and put a plan in place to mitigate any negative impacts from the emergency.

I am requesting that you review the emergency response plan (including emergency plan risk assessment) as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

An effective emergency response plan not only impacts East Coast Catering but also impacts other contractors at the site (such as Marine Contractors). As such, it is the responsibility of the Principal Contractor Emera to take the lead role in the development of a site specific emergency response plan.
If you have any questions or comments, please get in touch.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [email]
Sent: Wednesday, October 28, 2015 12:38 PM
To: Roberts, Welson; Hogan, Blair
Cc: [email]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Hi Welson,

As discussed, attached is our Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT for the Granite Canal Camp, revised to reflect the feedback received from Fire & Emergency Services (also attached).

As per my previous email, I will require clarification and/or suggestions regarding the training required for proper use of fire extinguishers. Also, as mentioned, there is no formal MOU in place between Emera NL and the Buchans Junction Volunteer Fire Department, simply a verbal agreement that they will respond in the event of an emergency.

Thanks again,

[Redacted]

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-08-15 3:32 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update. Order 661639 - 05 is closed.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430

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From: [email protected]  
Sent: Wednesday, October 07, 2015 4:09 PM  
To: Roberts, Welson;  
Cc:  
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Just a further update on the respirators...the WWTP Operator (current position) currently on site is now in possession of his respirator (it arrived on site yesterday evening). Myself and [redacted] will be heading to site on Tuesday, October 13th and will be hand-delivering the other WWTP Operator, [redacted] respirator. He is not due to return to site until October 19th.

Regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]  
Sent: October-06-15 1:05 PM  
To:  
Cc:  
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update...

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430

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From: [email protected]  
Sent: Tuesday, October 06, 2015 9:34 AM  
To: [redacted] Roberts, Welson  
Cc:  
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good morning [redacted] and Welson,
Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

From: [Email Redacted]@emera.com
Sent: October-05-15 8:20 PM
To: [Email Redacted]
Cc: [Email Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks

From: [Email Redacted]@ecltl.ca
Sent: October-05-15 5:42 PM
To: [Email Redacted]
Cc: [Email Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi

Status of Orders are as follows:

**Order 0661639-01:**
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-02:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-03:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-04:**
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21st.

**Order 0661639-05:**
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29th and were due to arrive on site October 1st. Upon follow-up with site it was determined that they had not yet been delivered. On October 2nd, Acklands Grainger contacted [Redacted] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” – and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

**Order 0661639-06:**
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29th.

I will update you tomorrow once we have a response on the status of #05.

Thanks,

From: [redacted]@emera.com
Sent: October-05-15 2:48 PM
To: [redacted]
Cc: [redacted]
Subject: FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi, can you please provide a status update on all ECC OHS Orders?

Thanks,

[Signatures]

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Hi:

I have reviewed the comments below. I know that this is a very preliminary response, but hopefully more will come as several key points are not addressed. For example, a meeting with near by emergency services does not satisfy the mutual aid agreement requirement. The reference to the critical supplies and equipment list only mentions fire fighting equipment. Finally, the severe weather comments are lacking, for example how would a site emergency such as a medical emergency be handled in a severe weather event when the roads in this remote area may become impassible for some time.

John

John Morgan

OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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Good afternoon

Apologies for providing a formal response until now but we wanted to make sure that your comments were addressed in sufficient detail to clearly display that we have taken these points extremely seriously and dedicated the resources and attention that this deserves. I have responded to each of the comments in bolded black font below:
Best regards,

From: Roberts, Welson  [mailto:welsonroberts@gov.nl.ca]
Sent: October-29-15 1:54 PM
To: [Redacted]
Cc: McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola; Morgan, John; Browne, Aiden
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good Afternoon,

Since our discussion I have further reviewed the Emergency Response Plan and have had a meeting with Blair Hogan of FES and a phone conversation with [Redacted] Emera. Based upon the review and conversations I offer the following comments:

- There is no signed MOU with the Buchan's Jct Fire Department and the Fire Department has very few fire fighters that can respond during the day (away working) and insufficient firefighting equipment to both respond to Granite Canal and provide firefighting services for the town. Buchans Junction is several hours travel time away from the Granite Canal site. Based on these facts, it is unlikely that the Buchans Junction Fire Department would not be able to provide an effective response to the Granite Canal site. The FL&S Permit was issued to DORA by Service NL December 18, 2014, and copied to the Fire Commissioner. This incorporates any comments that the Fire Chief (Grand Falls Winsor) would have.

- Other than fire extinguishers, there is no firefighting equipment at the site. Workers have not been trained in fire extinguisher use and the emergency response plan indicates that the response is to evacuate. There are no emergency responders listed in the ERP for firefighting. DaSIT Recharging will be coming to site on Tuesday, November 3rd to provide this training for all staff. They will be doing the same for the other shift two weeks after (Nov 17). Monday was not possible due to our staff all changing out that day. [Redacted] suggested that Tuesday would be a better day anyway, due to Monday's forecast calling for rain and the adverse effects this would have on the practical training exercises required. In addition to the training, [Redacted] is going to conduct an inspection on all existing extinguishers (even though they aren’t due for inspection this year, I figured this would be a good proactive measure). He is also going to conduct an inspection on the hood suppression system in the kitchen, and change out the required fuses and filters. A detailed equipment inventory has been taken (now Appendix D of the attached ERP), listing all fire extinguishers on site and their current locations. We will be requesting that DaSIT Recharging supply us with the outstanding fire extinguishers that have since been approved via Change Order during [Redacted] visit on Tuesday. ENL would like to set up a meeting with you next week discuss the Firefighting component in further detail, if possible.

- The medic is listed as the ERP Coordinator or the frontline person responsible for the management of an emergency. This is not appropriate or normally functionally possible as there is only one Medic. If there are ill or injured persons the Medic would have to deal with this aspect of the emergency and hence not be able to effectively manage the emergency response. The medic is an emergency responder. ECC's Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT B (Attached) has been revised to reflect the change in roles — Medic is now Emergency Responder, Chef Manager is the ERP Coordinator and Maintenance Person is now Communications Coordinator.

- There is no critical supplies and equipment inventory. All fire extinguishers are being inspected by the Maintenance Person on a weekly basis. DaSIT will be performing a certifying inspection next week. As per above, attached inventory lists all fire suppression equipment.

- There are no mutual aid agreements to specify the response to be provided by outside agencies. On Aug 18th, ENL hosted a meet and greet with Buchans, Millertown Badger, Grand Falls. The attendees of this meeting were each towns Emergency Responder (i.e. Search and Rescue, Central Health, fire departments)
- The guidance for dealing with a mass/multiple casualty incident is lacking. There is a medic on site, regardless of the number of people staying in camp. Also, each one of the contractors has an ERP that will be used in the event of an emergency and people trained in emergency response.

- The guidance for dealing with a severe weather emergency is lacking. The Site has a dedicated backup generator with fuel for 4 days. Minimum 7-day par stock of food supplies is always maintained on site. ENL has an agreement with the snow clearing contractor to be able to clear the roads within a timely fashion.

- The “crisis communications” guidance is lacking. There is an ENL communication plan in place that is divided into level 1, 2, 3 events.

- The guidance for emergency management exercise design is lacking. We would like to discuss this further to identify deficiencies, if possible.

I note that one extension has been granted until Oct 31, 2015 for review of the emergency response plan. This extension was granted based upon the fact that there was very little activity at the site (shut down due to work stand downs) and that East Coast Catering would need to consult with Fire and Emergency Services. Since that time activities have begun to ramp up at the camp site and it has become evident that there is inadequate firefighting capabilities and fire rescue capabilities. This has been discussed by phone today with and he agrees that Enera will be taking a lead role in ensuring that there is an effective emergency response plan in place for the site. committed to immediately investigate the matter and to ensure that corrective actions are put in place. I advised , and am now advising you of the urgent need to ensure that there is an effective emergency response plan in place. No further extension to orders 661639 – 01, 661639 – 02 and 661639 – 03 at this time. I am requesting that you review the emergency response plan (including emergency plan risk assessment) as soon as possible as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

Please provide a response to the review of the emergency response plan as soon as possible.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]
Sent: Thursday, October 29, 2015 12:02 PM
To: Roberts, Welson
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the feedback, Welson...very valid points. What kind of approximate timeline are we looking at to complete this, would you say? You mentioned during our chat that these orders will need to been given extensions...

Regards,
From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-28-15 4:05 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update.

I have forwarded the ERP and comments from Fire and Emergency Services (FES) to individuals within the OHS Division for review. I will provide further comments once this review is complete.

With respect to your question regarding fire extinguisher training, I believe that Martins Fire Safety (St. John's) offers a fire extinguisher training course. I also note that FES also offers a two day Defensive Firefighting course which includes training on portable extinguishers.

Required resources (such as firefighting equipment) and training needs should have been identified during the emergency plan risk assessment. Response times to emergencies should have also been considered during the risk assessment. The expected response time for local emergency responders is not identified in the ERP but this will undoubtedly have an impact on the level of resources and training required at the site. The impact that adverse weather and road conditions must also be considered during the risk assessment process. For instance, we know that the Buchans Jct Fire Department may take several hours to reach the site (even longer during a stormy winter night), but there does not seem to be a clear plan in place to deal with the situation of someone being unable to evacuate from a smoke filled or burning camp building. In this case, a rescue is required ASAP but it is not clear from the plan how this will take place. It is not even clear how evacuated workers will be dealt with if the evacuation occurs during a freezing, stormy winter night. During discussions it was stated that "people will do what they have to do to rescue someone". This may be the case but there is likelihood in further escalating the emergency rather than resulting in a successful rescue. The whole purpose of an emergency response plan is to identify all potential emergencies (considering worst case scenario) and put a plan in place to mitigate any negative impacts from the emergency.

I am requesting that you review the emergency response plan (including emergency plan risk assessment) as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

An effective emergency response plan not only impacts East Coast Catering but also impacts other contractors at the site (such as Marine Contractors). As such, it is the responsibility of the Principal Contractor Emera to take the lead role in the development of a site specific emergency response plan.

If you have any questions or comments, please get in touch.

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To: Roberts, Welson; Hogan, Blair
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Hi Welson,

As discussed, attached is our Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT for the Granite Canal Camp, revised to reflect the feedback received from Fire & Emergency Services (also attached).

As per my previous email, I will require clarification and/or suggestions regarding the training required for proper use of fire extinguishers. Also, as mentioned, there is no formal MOU in place between Emera NL and the Buchans Junction Volunteer Fire Department, simply a verbal agreement that they will respond in the event of an emergency.

Thanks again,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-08-15 3:32 PM
To: 
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update - Order 0661639 - 05 is closed.

Welson Roberts, CRSP
Occupational Health and Safety Officar, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: ecc@ecltd.ca
Sent: Wednesday, October 07, 2015 4:09 PM
To: Roberts, Welson; Hogan, Blair
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Just a further update on the respirators...the WWTP Operator currently on site is now in possession of his respirator (it arrived on site yesterday evening). Myself and [redacted] will be heading to site on Tuesday, October 13th and will be hand-delivering the other WWTP Operator's respirator. He is not due to return to site until October 19th.

Regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-06-15 1:05 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@eccltd.ca]
Sent: Tuesday, October 06, 2015 9:34 AM
To: Roberts, Welson
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good morning [redacted] and Welson,

Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

From: [redacted]@emera.com]
Sent: October-05-15 8:20 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks:

From: [redacted]@eccltd.ca]
Sent: October-05-15 5:42 PM
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi [Redacted]

Status of Orders are as follows:

Order 0661639-01:
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31st, 2015.

Order 0661639-02:
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

Order 0661639-03:
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

Order 0661639-04:
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21st.

Order 0661639-05:
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29th and were due to arrive on site October 1st. Upon follow-up with site it was determined that they had not yet been delivered. On October 2nd, Acklands Grainger contacted [Redacted] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

Order 0661639-06:
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29th.

I will update you tomorrow once we have a response on the status of #05.

Thanks,

[Redacted]
Roberts, Welson

From: [Redacted]
Sent: Monday, November 02, 2015 12:01 PM
To: ECC Granite Lake Manager
Cc: [Redacted] Roberts, Welson

Subject: Fire Extinguisher training

Importance: High

Good morning

Just wanted to provide you with an update on tomorrow’s training:

• [Redacted] should be arriving on site sometime around noon tomorrow. I gave him your phone number and he said he’s going to call you from Millertown. Please ensure that all staff on site are present for this training. He will be returning again in two weeks’ time to train the opposite crew in the same.

• He will be bringing 6 x 20 lb ABC extinguishers with him, as per the related change order. He has agreed to match [Redacted] HST that we had originally quoted and received approval from ENL on. He will be asking you for billing information for ECC, so please provide him with our head office contact info.

• He will require use of a DVD player and TV for the 20-minute training video, then will proceed to carry out the practical component of the training. He will keep a record of all attendees and issue formal training certificates, which are valid for 3-years.

• The model information you provided on the Hood Suppression System doesn’t appear to be what he was looking for, so he is going to assess the unit himself and then bring all of the required fuse links and filters with him during his next trip.

• [Redacted] is going to conduct an inspection of all of our current extinguishers. Depending on how smoothly things go, he may only do a portion of the extinguishers this trip and then inspect the remainder the next time. Or, he may decide to do them all in one shot...and if he does he may prefer to stay the night. He said he would just play it by ear but can you please be prepared to accommodate him for a night if he so chooses? Is there anything that you need from [Redacted] in advance to facilitate this?

• When I explained that two of the ABC extinguishers were for the Generator, he commented that it is typically best practice to have both an ABC and CO₂ extinguisher on site. Reason being, using an ABC leaves a lot of residue that can contribute to corrosion or possibly damage if not properly cleaned (which is time consuming and quite costly), whereas the CO₂ simply evaporates. He suggested that you first try to extinguish the fire with the CO₂ and if that doesn’t work you will use the ABC as a last resort. I told him that [Redacted] will show him the generator during this visit and if we do determine that a CO₂ is something we need we can arrange to have him bring it in two weeks’ time.

Let me know if you have any issues.

Thanks,
Hi Welson,

I attempted to call you earlier today but understand you are out of the office this week attending training. I was just wondering if you had a chance to review the update email I sent you on Friday? Also, we have a meeting at ENL this afternoon, specifically to discuss the ERP activities on site, so if you have any specific updates or items that you wanted me to pass along, please advise.

Thanks and talk soon!
Hi:

It appears that the document attached is the preliminary response from the "Plan and Review" process. This is intended to ensure that fire and life safety, as well as accessibility issues, are considered during the design and construction of such occupancies. Also, evidence was not provided to verify that the actual finished project meets these requirements.

It is important to also note that the review by Fire Protection Officer Linus Trembllett identified a number of deficiencies. I understand that we have not yet been provided with documentation to verify that these have been addressed. As to the meetings with the emergency response agencies noted, there is no documentation (mutual aid agreements) to verify what if any emergency response role these agencies will play.

John

John Morgan

OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769

c. 709-691-6388

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From: Roberts, Welson
Sent: Monday, November 09, 2015 10:48 AM
To: Power, Loyola; McCurdy, Darlene; Carter, Doug; Martin, Denis; Browne, Aiden; Morgan, John
Subject: FW - Granite Canal

FYI

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [Redacted]@emera.com
Sent: Friday, October 30, 2015 3:51 PM
To: Roberts, Wilson
Subject: [Redacted] Granite Canal

Wilson;

It was good to speak to you today, I am so looking forward to meeting you and Aiden (did I spell it correctly) and to review Emera’s process and how we got to where we are today and plans going forward for your consideration. There was a whole team of individuals involved in assessing, evaluating and implementing. I have also included the Fire Safety Conditional Approval Document from NL.

Emera Processes

1. Design & Drawing Approval Process for Camp
2. Fire Life Safety Permit for Accommodation Process
3. The Standard applied by Service NL to this camp was requirements of the National Fire Code of Canada “remote work camps” section and National Building Code Requirements.
4. Meetings with fire departments (3), central health (1) and Buchan’s Red Indian SAR groups
5. Review by Fire & Emergency Services Fire Chief Linus Tremblett from Grand Falls – Windsor
6. Experience in Labrador at remote camps
7. Dry Hydrant installation

Also we would like to address gaps that have been identified and how we plan to address.

Have a great weekend!

Emera
[Redacted]

www.emera.com
Thanks Wilson... I will keep you posted.

Thanks for the update. Order 661639 – 02 (fire extinguisher training) is extended until Nov 17, 2015.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Terrific thanks for the update. Please forward us a copy of the report upon receipt. I can only assume that certificates will be held back until payment of the associated invoice is received...

Cheers,
Hi Guys,

We just completed the training for the extinguishers and all went extremely well. [redacted] is now going to start his inspections and do up a report along with some recommendations and I will forward to you as soon as they are complete. I have November 17 booked for the next crew and that will cover [redacted] until the end of the month.

[Your Name]
Chef Manager
Granite Canal Camp
East Coast Catering Ltd.

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Good morning Mr. Morgan,

Please see attached signed acknowledgements for receipt of the *Inspection / Officers Report and Order Form 640937*. Rest assured, we are currently working with our medical services subcontractor, AOMS, to address all recommended corrective actions.

Regarding Order 0640937-01, ECC’s *Project Specific Emergency Response Plan* is currently being revised to cover response and management of Multiple Casualty Incidents, with training and functional exercises to follow upon completion.

Regarding Order 0640937-02, a smoke detector is being installed in the Nurse’s clinic *today*.

Regarding Orders 0640937-03 through 06, I have a meeting scheduled today with AOMS to review all deficiencies and procure the necessary equipment/supplies for the clinic.

I will update you as we progress through addressing each order.

If you could please include me on all future correspondence pertaining to any orders/directives issued to East Coast Catering Firm # 614432 going forward, it would be greatly appreciated.

Thanks,
Good morning, Welson. I hope you and your family had a terrific holiday season!

Myself and [redacted] have had a number of meetings since our last correspondence and believe that we have made significant progress in addressing your concerns. As a follow-up to Orders 661639-01 and 661639-03, I have attached the following documents for your consideration/review:

- Service NL Fire Life & Safety Approval Documentation for Granite Canal Camp
- Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT C, revised to address your previous comments/suggestions and other improvement initiatives. Once we have received your approval, and the Camp is back up and running, all applicable staff will be trained on their specific duties/responsibilities outlined within the ERP.
- Granite Canal Emergency Response Risk Assessment
- Medical Response Consumables and Equipment Inventory
- Revised Rules of Conduct and Procedures for the Granite Canal Accommodations Facilities (now includes Section 3 – Emergency Procedures)

We have since received all of the certificates for the Fire Extinguisher training, so if you would like to see copies of these let me know and I’ll forward you the scans. In addition, all fire extinguishers/suppression systems on site have been inspected and serviced accordingly by DASIT Recharging.

I trust that the above and attached is satisfactory, however please don’t hesitate to let me know if you require anything further.

Best regards,

[redacted]
Good Morning.

Thanks for the update. I'm in Central NL today so I won't be able to meet in St. John's. Order 661639 - 02 (fire extinguisher training) is closed. Good to hear that the emergency plan risk assessment has been completed. Please forward a copy of the completed risk assessment.

Order 661639 - 01 and 661639 - 03 are extended until December 31, 2015 based upon the fact that there is no work ongoing at the Granite Canal site.

I have no problem with meeting as suggested when updates are complete.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [email protected]
Sent: Thursday, December 03, 2015 11:00 AM
To: Roberts, Welson
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Welson;

How are you doing? Are you in St. John's today, perhaps and I could get together with you if you are. I am hoping to get out today before the snow hits, my flight is at 6:30pm so should be OK but I understand they are calling for 20-30 cm here in St. John's starting late tonight.

With regard to Granite Canal, just wanted to make you aware, we have no work on site, all work is halted until the new year. At that time there will be contractors back to camp. This gives us the opportunity to get changes in place approved.

A risk assessment has been completed, is in the process of updating the Emergency Response Plan, he also wanted to inform you that the fire extinguisher training has been completed and certificates received.

We will keep you informed of progress, I will give you a call to set up a meeting with you once all updates are complete.

Have a safe & productive day!

Emera
F: 902-625-1453

www.emera.com
From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: December-01-15 1:31 PM
To: [Obfuscated]
Cc: McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola; Morgan, John; Browne, Aiden;
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good Afternoon

Could you please provide an update to orders 661639 – 01,02,03? It was my understanding from our conference call on Nov 12 that an emergency plan risk assessment would be conducted for the Granite Canal site. Once the assessment was complete, the emergency response plan would be updated. I am not sure of the present status with these matters.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [Obfuscated]
Sent: Friday, October 30, 2015 4:44 PM
To: Roberts, Welson;
Cc: McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola; Morgan, John; Browne, Aiden;
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi Welson,

Apologies for any confusion...I just realized that in my haste I inadvertently addressed the below email to [Obfuscated] instead of you.

I want to also point out a minor mistake in comment #3 below - the position of Communications Coordinator has been eliminated entirely, with all previous functions falling under the ERP Coordinator and Fire Wardens. The revised ERP that I attached reflects this.

Best regards,
Good afternoon

Apologies for providing a formal response until now but we wanted to make sure that your comments were addressed in sufficient detail to clearly display that we have taken these points extremely seriously and dedicated the resources and attention that this deserves. I have responded to each of the comments in bolded black font below:

Best regards,

Since our discussion I have further reviewed the Emergency Response Plan and have had a meeting with Blair Hogan of FES and a phone conversation with Harris McNamara of Emera. Based upon the review and conversations I offer the following comments:

- There is no signed MOU with the Buchan’s Jct Fire Department and the Fire Department has very few fire fighters that can respond during the day (away working) and insufficient firefighting equipment to both respond to Granite Canal and provide firefighting services for the town. Buchans Junction is several hours travel time away from the Granite Canal site. Based on these facts, it is unlikely that the Buchans Junction Fire Department would not be able to provide an effective response to the Granite Canal site. The FL&S Permit was issued to DORA by Service NL December 18, 2014, and copied to the Fire Commissioner. This incorporates any comments that the Fire Chief (Grand Falls Winstor) would have.

- Other than fire extinguishers, there is no firefighting equipment at the site. Workers have not been trained in fire extinguisher use and the emergency response plan indicates that the response is to evacuate. There are no emergency responders listed in the ERP for firefighting. DaSIT Recharging will be coming to site on Tuesday, November 3rd to provide this training for all staff. They will be doing the same for the other shift two weeks after (Nov 17). Monday was not possible due to our staff all changing out that day. [redacted] suggested that Tuesday would be a better day anyway, due to Monday’s forecast calling for rain and the adverse effects would have on the practical training exercises required. In addition to the training, [redacted] is going to conduct an inspection on all existing extinguishers (even though they aren’t due for inspection this year, I figure this would be a good proactive measure). He is also going to conduct an inspection on the hood suppression system in the kitchen, and change out the required fuses and filters. A detailed equipment inventory has been taken (now Appendix D of the attached ERP), listing all fire extinguishers on site and their current locations. We will be requesting that DaSIT Recharging supply us with the outstanding fire extinguishers that have since been approved via Change Order during [redacted] visit on Tuesday. ENL would like to set up a meeting with you next week discuss the Firefighting component in further detail, if possible.
The medic is listed as the ERP Coordinator or the frontline person responsible for the management of an emergency. This is not appropriate or normally functionally possible as there is only one Medic. If there are ill or injured persons the Medic would have to deal with this aspect of the emergency and hence not be able to effectively manage the emergency response. The medic is an emergency responder. ECC’s Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT B (Attached) has been revised to reflect the change in roles – Medic is now Emergency Responder, Chef Manager is the ERP Coordinator and Maintenance Person is now Communications Coordinator.

There is no critical supplies and equipment inventory. All fire extinguishers are being inspected by the Maintenance Person on a weekly basis. DaSiT will be performing a certifying inspection next week. As per above, attached inventory lists all fire suppression equipment.

There are no mutual aid agreements to specify the response to be provided by outside agencies. On Aug 18th, ENL hosted a meet and greet with Buchans, Millertown Badger, Grand Falls. The attendees of this meeting were each town’s Emergency Responder (i.e. Search and Rescue, Central Health, fire departments).

The guidance for dealing with a mass/multiple casualty incident is lacking in appropriate detail. There is a medic on site, regardless of the number of people staying in camp. Also, each one of the contractors has an ERP that will be used in the event of an emergency and people trained in emergency response.

The guidance for dealing with a severe weather emergency is lacking. The Site has a dedicated backup generator with fuel for 4 days. Minimum 7-day par stock of food supplies is always maintained on site. ENL has an agreement with the snow clearing contractor to be able to clear the roads within a timely fashion.

The “crisis communications” guidance is lacking. There is an ENL communication plan in place that is divided into level 1, 2, 3 events.

The guidance for emergency management exercise design is lacking. We would like to discuss this further to identify deficiencies, if possible?

I note that one extension has been granted until Oct 31, 2015 for review of the emergency response plan. This extension was granted based upon the fact that there was very little activity at the site (shut down due to work stand downs) and that East Coast Catering would need to consult with Fire and Emergency Services. Since that time activities have begun to ramp up at the camp site and it has become evident that there is inadequate firefighting capabilities and fire rescue capabilities. This has been discussed by phone today with [REDACTED] and he agrees that Emera will be taking a lead role in ensuring that there is an effective emergency response plan in place for the site. [REDACTED] committed to immediately investigate the matter and to ensure that corrective actions are put in place. I advised [REDACTED] and am now advising you of the urgent need to ensure that there is an effective emergency response plan in place. No further extension to orders 661639 – 01, 661639 – 02 and 661639 – 03 at this time. I am requesting that you review the emergency response plan (including emergency plan risk assessment) as soon as possible as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

Please provide a response to the review of the emergency response plan as soon as possible.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430
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Section 40(1)

From: [redacted]@ecc ltd.ca
Sent: Thursday, October 29, 2015 12:02 PM
To: Roberts, Welson
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the feedback, Welson...very valid points. What kind of approximate timeline are we looking at to complete this, would you say? You mentioned during our chat that these orders will need to been given extensions...

Regards,

Section 40(1) Section 40(1)

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-28-15 4:05 PM
To: [redacted] Hogan, Blair; Browne, Aiden; McCurdy, Darlene; Carter, Doug; Martin, Denis; Morgan, John; Power, Loyola
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update

Section 40(1)

I have forwarded the ERP and comments from Fire and Emergency Services (FES) to individuals within the OHS Division for review. I will provide further comments once this review is complete.

With respect to your question regarding fire extinguisher training, I believe that Martins Fire Safety (St. John’s) offers a fire extinguisher training course. I also note that FES also offers a two day Defensive Firefighting course which includes training on portable extinguishers.

Required resources (such as firefighting equipment) and training needs should have been identified during the emergency plan risk assessment. Response times to emergencies should have also been considered during the risk assessment. The expected response time for local emergency responders is not identified in the ERP but this will undoubtedly have an impact on the level of resources and training required at the site. The impact that adverse weather and road conditions must also be considered during the risk assessment process. For instance, we know that the Buchans Jct Fire Department may take several hours to reach the site (even longer during a stormy winter night), but there does not seem to be a clear plan in place to deal with the situation of someone being unable to evacuate from a smoke filled or burning camp building. In this case, a rescue is required ASAP but it is not clear from the plan how this will take place. It is not even clear how evacuated workers will be dealt with if the evacuation occurs during a freezing, stormy winter night. During discussions it was stated that “people will do what they have to do to rescue someone”. This may be the case but there is likelihood in further escalating the emergency rather than resulting in a successful rescue. The whole purpose of an emergency response plan is to identify all potential emergencies (considering worst case scenario) and put a plan in place to mitigate any negative impacts from the emergency.

I am requesting that you review the emergency response plan (including emergency plan risk assessment) as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

An effective emergency response plan not only impacts East Coast Catering but also impacts other contractors at the site (such as Marine Contractors). As such, it is the responsibility of the Principal Contractor Emera to take the lead role in the development of a site specific emergency response plan.
If you have any questions or comments, please get in touch.

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430

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From: [REDACTED]@eccitltd.ca
Sent: Wednesday, October 28, 2015 12:38 PM
To: Roberts, Welson; Hogan, Blair
Cc: [REDACTED]@eccitltd.ca
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Hi Welson,

As discussed, attached is our Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT for the Granite Canal Camp, revised to reflect the feedback received from Fire & Emergency Services (also attached).

As per my previous email, I will require clarification and/or suggestions regarding the training required for proper use of fire extinguishers. Also, as mentioned, there is no formal MOU in place between Emera NL and the Buchans Junction Volunteer Fire Department, simply a verbal agreement that they will respond in the event of an emergency.

Thanks again,

From: Roberts, Welson (mailto:welsonroberts@gov.nl.ca)
Sent: October-08-15 3:32 PM
To: [REDACTED]@eccitltd.ca
Cc: [REDACTED]@eccitltd.ca
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update. Order 661639 - 05 is closed.
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From: [redacted]@ecc ltd.ca
Sent: Wednesday, October 07, 2015 4:09 PM
To: Roberts, Welson;
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Just a further update on the respirators....the WWTP Operator (redacted) currently on site is now in possession of his respirator (it arrived on site yesterday evening). Myself and (redacted) will be heading to site on Tuesday, October 13th and will be hand-delivering the other WWTP Operator (redacted) respirator. He is not due to return to site until October 19th.

Regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-06-15 1:05 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@ecc ltd.ca
Sent: Tuesday, October 06, 2015 9:34 AM
To: [redacted]; Roberts, Welson
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good morning [redacted] and Welson,
Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

From: [Redacted]@emera.com
Sent: October-05-15 8:20 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks

From: [Redacted]@eccltd.ca
Sent: October-05-15 5:42 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi

Status of Orders are as follows:

**Order 0661639-01:**
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-02:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-03:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-04:**
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21st.

**Order 0661639-05:**
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29th and were due to arrive on site October 1st. Upon follow-up with site it was determined that they had not yet been delivered. On October 2nd, Acklands Grainger contacted [Redacted] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” – and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

**Order 0661639-06:**
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29th.

I will update you tomorrow once we have a response on the status of #05.

Thanks,

From: [redacted]@emera.com
Sent: October-05-15 2:48 PM
To: [redacted]
Cc: [redacted]
Subject: FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi, can you please provide a status update on all ECC OHS Orders?

Thanks,

―

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December 18, 2014
Dora Construction Limited
60 Doray Avenue, Suite 100
Dartmouth, NS
B3B 0E1

Attention: [Redacted]

Re: Plans – Proposed Temporary Construction Camp, Granite Canal

We acknowledge receipt of plans and other information pertaining to fire and life safety and buildings accessibility for the above project. Our comments for each aspect of review are as follows:

FIRE & LIFE SAFETY

We have reviewed the plans and FC/NBC form and found them generally acceptable. However, at the time of construction, you must ensure that the following items are included:

1. That this building, because of the type of occupancy, occupant load, and/or the installation of an automatic sprinkler system is required to be equipped with a fire alarm system. This system shall be designed in accordance with Section 3.2.5 of the National Building Code of Canada. The system devices and panel shall be plotted on the floor plans and be identified with a device schedule. These plans shall be designed by a licensed fire alarm company and submitted to this office for review and approval before “Final Occupancy” is granted.

2. That emergency lighting shall be provided in accordance with Chapter 7 of the Life Safety Code. Emergency lighting shall provide not less than 90 minute duration and shall be extended to include all exterior access to the public way.

3. Construction camp buildings shall meet the requirements of the National Building Code of Canada. Listed below are the requirements that need to be incorporated into the camps design.
   a. Sleeping rooms shall be fire separated for a minimum of 30 minutes.
   b. Floor assemblies shall be fire rated for a minimum of 30 minutes.
   c. Flame spread ratings shall not exceed 25.
   d. Camp buildings shall be separated by a distance of not less than 10m.
   e. A fire alarm system shall be designed for the sleeping buildings. Plans for the system shall be forwarded to the Government Service Centre for review and approval prior to installation.
   f. Fire extinguishers shall be installed in accordance with NFPA-10.
   g. Hose stations shall be installed in sleeping buildings and located near exits. A hose of sufficient length shall be used so every portion of the building is within reach of a hose stream. Hose shall be not less than 19mm inside diameter shall be connected to a central water supply or to a storage tank having a capacity of not less than 5 L/s at a gauge pressure of 300 kPa.

Additional requirements that must be adhered to at the time of construction are as follows:

That where a fire alarm, sprinkler, and/or kitchen system, fire extinguishers, and/or emergency lighting have been installed, they shall be inspected to ensure proper operation and location. This inspection shall be performed by a service company listed and licensed by the Office of the Fire Commissioner. A copy of all inspection certificates, where applicable, shall be forwarded to the Office of the Fire Commissioner for filing.

The project shall be completed with the approved plans and information provided on the FC/NBC Form. All applicable provisions of the National Building, Fire Code of Canada and Means of Egress requirements as outlined in the NFPA 101 Life Safety Code must be complied with.
BUILDINGS ACCESSIBILITY

We have reviewed the drawings of the above project for compliance with the Buildings Accessibility Act and Regulations. As a result of our survey, we have registered the design of the project as follows:

<table>
<thead>
<tr>
<th>PROJECT #</th>
<th>DRAWING #</th>
<th>REGISTRATION#</th>
</tr>
</thead>
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<td>A101-A107, A1, C00002-A-004, C00002-A-005</td>
<td>BA 15483</td>
</tr>
</tbody>
</table>

Please note that in addition to the plan and details referenced above, you must ensure that:

1. Every doorway that is located in a barrier-free path of travel shall have a clear width of not less than 810 mm when the door is in the open position, as per The Schedule (Section 5.2) of the Canadian Standards Association Accessible Design for the Built Environment. Thresholds for doorways shall be not more than 13 mm higher than the finished floor surface and shall be bevelled to facilitate the passage of wheelchairs, as per the Schedule (Section 5.2.6).

2. Door operating devices shall be of a design which does not require tight grasping and twisting of the wrist as the only means of operation as per the Schedule (Section 5.2.7) of the Canadian Standards Association Accessible Design for the Built Environment.

3. Where a fire alarm system is provided, visual alarms must be included as per the Schedule (Section 5.7.1) of the Canadian Standards Association Accessible Design for the Built Environment.

4. Exterior barrier free paths of travel must conform to the Schedule (Section 8) of the Canadian Standards Association Accessible Design for the Built Environment.

This registration is subject to a final inspection before occupancy. To arrange for an inspection, please contact Service NL at (709) 258–1431.

We trust that you will note and adhere to the requirements as stated above for both Fire and Life Safety and Buildings Accessibility.

Barry Porter
Design Approval Technician II
G.S.C Gander
Phone (709)256-1436
Fax (709)256-1439

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Hi Everyone,

I'll have Jill schedule a meeting in the next few days. Welson if you could just let them know you are reviewing the documentation and will get back to them by weekend that should be fine.

Thanks,
Loyola

Loyola Power
Director

Service NL
Occupational Health and Safety Division
28 Pippy Place, St.Johns, NL A1B 3X4
Tel (709) 729-3275 Fax (709) 729-3445
Email: Loyolapower@gov.nl.ca
Website: www.gs.gov.nl.ca

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From: McCurdy, Darlene
Sent: Monday, January 4, 2016 3:51 PM
To: Morgan, John; Roberts, Welson; Power, Loyola; Martin, Denis; Carter, Doug; Browne, Aiden
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Who is taking the lead on this? Something needs to be set up.

Darlene McCurdy, BSc, CRSP
Manager
Service NL
OHS Inspections (Western)
P. O. Box 2006
Corner Brook, NL
A2H 6J8
Phone: 637-2304
Fax: 637-2928
Hi:

Have to agree, there are significant deficiencies with regard to what has been submitted.

John Morgan

OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

From: Roberts, Welson
Sent: Monday, January 04, 2016 3:19 PM
To: Power, Loyola; McCurdy, Darlene; Martin, Denis; Carter, Doug; Browne, Aiden; Morgan, John
Subject: FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Further to our recent teleconference with Emera and the email below (with attachments) I believe we need to further discuss the ERP for the Granite Canal site.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430
Good morning, Wilson. I hope you and your family had a terrific holiday season!

Myself and [redacted] have had a number of meetings since our last correspondence and believe that we have made significant progress in addressing your concerns. As a follow-up to Orders 661639 – 01 and 661639 – 03, I have attached the following documents for your consideration/review:

- Service NL Fire Life & Safety Approval Documentation for Granite Canal Camp
- Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT C, revised to address your previous comments/suggestions and other improvement initiatives. Once we have received your approval, and the Camp is back up and running, all applicable staff will be trained on their specific duties/responsibilities outlined within the ERP.
- Granite Canal Emergency Response Risk Assessment
- Medical Response Consumables and Equipment Inventory
- Revised Rules of Conduct and Procedures for the Granite Canal Accommodations Facilities (now includes Section 3 – Emergency Procedures)

We have since received all of the certificates for the Fire Extinguisher training, so if you would like to see copies of these let me know and I’ll forward you the scans. In addition, all fire extinguishers/suppression systems on site have been inspected and serviced accordingly by DASIT Recharging.

I trust that the above and attached is satisfactory, however please don’t hesitate to let me know if you require anything further.

Best regards,

[Signature]

From: Roberts, Wilson [mailto:welsonroberts@gov.nl.ca]
Sent: December-03-15 1:01 PM
To: [redacted]<emera.com>
Cc: [redacted]; Power, Loyola <LoyolaPower@gov.nl.ca>; Browne, Aiden <brownea@gov.nl.ca>; Morgan, John <jimorgan@gov.nl.ca>; Martin, Denis <martind@gov.nl.ca>; Carter, Doug <dcarter@gov.nl.ca>
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good Morning [redacted]

Thanks for the update. I’m in Central NL today so I won’t be able to meet in St. John’s. Order 661639 – 02 (fire extinguisher training) is closed. Good to hear that the emergency plan risk assessment has been completed. Please forward a copy of the completed risk assessment.

Order 661639 – 01 and 661639 – 03 are extended until December 31, 2015 based upon the fact that there is no work ongoing at the Granite Canal site.

I have no problem with meeting as suggested when updates are complete.
Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
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Ph: 709-292-4351
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From: [redacted]@emera.com
Sent: Thursday, December 03, 2015 11:00 AM
To: Welson Roberts
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Welson;

How are you doing? Are you in St. John’s today, perhaps [redacted] and I could get together with you if you are. I am hoping to get out today before the snow hits, my flight is at 6:30pm so should be OK but I understand they are calling for 20-30 cm here in St. John’s starting late tonight.

With regard to Granite Canal, just wanted to make you aware, we have no work on site, all work is halted until the new year. At that time there will be contractors back to camp. This gives us the opportunity to get changes in place approved.

A risk assessment has been completed [redacted] is in the process of updating the Emergency Response Plan, he also wanted to inform you that the fire extinguisher training has been completed and certificates received.

We will keep you informed of progress, I will give you a call to set up a meeting with you once all updates are complete.

Have a safe & productive day!

[redacted]

www.emera.com

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: December-01-15 1:31 PM
To: [redacted]@emera.com
Good Afternoon

Could you please provide an update to orders 661639 – 01.02.03? It was my understanding from our conference call on Nov 12 that an emergency plan risk assessment would be conducted for the Granite Canal site. Once the assessment was complete, the emergency response plan would be updated. I am not sure of the present status with these matters.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
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Fax: 709-292-4430

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Hi Welson,

Apologies for any confusion...I just realized that in my haste I inadvertently addressed the below email to [redacted] instead of you.

I want to also point out a minor mistake in comment #3 below - the position of Communications Coordinator has been eliminated entirely, with all previous functions falling under the ERP Coordinator and Fire Wardens. The revised ERP that I attached reflects this.

Best regards,

Good afternoon
Apologies for providing a formal response until now but we wanted to make sure that your comments were addressed in sufficient detail to clearly display that we have taken these points extremely seriously and dedicated the resources and attention that this deserves. I have responded to each of the comments in bolded black font below:

Best regards,

Section 40(1)

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-29-15 1:54 PM
To: 
Cc: McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola; Morgan, John; Browne, Aiden
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good Afternoon

Since our discussion I have further reviewed the Emergency Response Plan and have had a meeting with Blair Hogan of FES and a phone conversation with [mask] from [mask]. Based upon the review and conversations I offer the following comments:

- There is no signed MOU with the Buchan’s Jct Fire Department and the Fire Department has very few fire fighters that can respond during the day (away working) and insufficient firefighting equipment to both respond to Granite Canal and provide firefighting services for the town. Buchans Junction is several hours travel time away from the Granite Canal site. Based on these facts, it is unlikely that the Buchans Junction Fire Department would not be able to provide an effective response to the Granite Canal site. The FL&S Permit was issued to DORA by Service NL December 18, 2014, and copied to the Fire Commissioner. This incorporates any comments that the Fire Chief (Grand Falls Winsor) would have.

- Other than fire extinguishers, there is no firefighting equipment at the site. Workers have not been trained in fire extinguisher use and the emergency response plan indicates that the response is to evacuate. There are no emergency responders listed in the ERP for firefighting. DaSIT Recharging will be coming to site on Tuesday, November 3rd to provide this training for all staff. They will be doing the same for the other shift two weeks after (Nov 17). Monday was not possible due to our staff all changing out that day. [mask] suggested that Tuesday would be a better day anyway, due to Monday’s forecast calling for rain and the adverse effects this would have on the practical training exercises required. In addition to the training, [mask] is going to conduct an inspection on all existing extinguishers (even though they aren’t due for inspection this year, I figured this would be a good proactive measure). He is also going to conduct an inspection on the hood suppression system in the kitchen, and change out the required fuses and filters. A detailed equipment inventory has been taken (now Appendix D of the attached ERP), listing all fire extinguishers on site and their current locations. We will be requesting that DaSIT Recharging supply us with the outstanding fire extinguishers that have since been approved via Change Order during [mask] visit on Tuesday. ENL would like to set up a meeting with you next week discuss the Firefighting component in further detail, if possible?

- The medic is listed as the ERP Coordinator or the frontline person responsible for the management of an emergency. This is not appropriate or normally functionally possible as there is only one Medic. If there are ill or injured persons the Medic would have to deal with this aspect of the emergency and hence not be able to effectively manage the emergency response. The medic is an emergency responder. ECC’s Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT B (Attached) has been revised to reflect the change in roles – Medic is now Emergency Responder, Chef Manager is the ERP Coordinator and Maintenance Person is now Communications Coordinator.

- There is no critical supplies and equipment inventory. All fire extinguishers are being inspected by the Maintenance Person on a weekly basis. DaSIT will be performing a certifying inspection next week. As per above, attached inventory lists all fire suppression equipment.
There are no mutual aid agreements to specify the response to be provided by outside agencies. On Aug 18th, ENL hosted a meet and greet with Buchans, Millertown Badger, Grand Falls. The attendees of this meeting were each towns Emergency Responder (i.e. Search and Rescue, Central Health, fire departments).

The guidance for dealing with a mass/multiple casualty incident is lacking in appropriate detail. There is a medic on site, regardless of the number of people staying in camp. Also, each one of the contractors has an ERP that will be used in the event of an emergency and people trained in emergency response.

The guidance for dealing with a severe weather emergency is lacking. The Site has a dedicated backup generator with fuel for 4 days. Minimum 7-day par stock of food supplies is always maintained on site. ENL has an agreement with the snow clearing contractor to be able to clear the roads within a timely fashion.

The "crisis communications" guidance is lacking. There is an ENL communication plan in place that is divided into level 1, 2, 3 events.

The guidance for emergency management exercise design is lacking. We would like to discuss this further to identify deficiencies, if possible.

I note that one extension has been granted until Oct 31, 2015 for review of the emergency response plan. This extension was granted based upon the fact that there was very little activity at the site (shutdown due to work stand downs) and that East Coast Catering would need to consult with Fire and Emergency Services. Since that time activities have begun to ramp up at the camp site and it has become evident that there is inadequate firefighting capabilities and fire rescue capabilities. This has been discussed by phone today with [redacted] and he agrees that Emera will be taking a lead role in ensuring that there is an emergency response plan in place for the site. [redacted] committed to immediately investigate the matter and to ensure that corrective actions are put in place. I advised [redacted] and am now advising you of the urgent need to ensure that there is an effective emergency response plan in place. No further extension to orders 661639 – 01, 661639 – 02 and 661639 – 03 at this time. I am requesting that you review the emergency response plan (including emergency plan risk assessment) as soon as possible as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

Please provide a response to the review of the emergency response plan as soon as possible.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@eccld.ca
Sent: Thursday, October 29, 2015 12:02 PM
To: Roberts, Wilson
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the feedback, Wilson...very valid points. What kind of approximate timeline are we looking at to complete this, would you say? You mentioned during our chat that these orders will need to been given extensions...
Regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-28-15 4:05 PM
To: Hogan, Blair; Browne, Aiden; McCurdy, Darlene; Carter, Doug; Martin, Denis; Morgan, John; Power, Loyola
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update

I have forwarded the ERP and comments from Fire and Emergency Services (FES) to individuals within the OHS Division for review. I will provide further comments once this review is complete.

With respect to your question regarding fire extinguisher training, I believe that Martins Fire Safety (St. John's) offers a fire extinguisher training course. I also note that FES also offers a two day Defensive Firefighting course which includes training on portable extinguishers.

Required resources (such as firefighting equipment) and training needs should have been identified during the emergency plan risk assessment. Response times to emergencies should have also been considered during the risk assessment. The expected response time for local emergency responders is not identified in the ERP but this will undoubtedly have an impact on the level of resources and training required at the site. The impact that adverse weather and road conditions must also be considered during the risk assessment process. For instance, we know that the Buchans Jct Fire Department may take several hours to reach the site (even longer during a stormy winter night), but there does not seem to be a clear plan in place to deal with the situation of someone being unable to evacuate from a smoke filled or burning camp building. In this case, a rescue is required ASAP but it is not clear from the plan how this will take place. It is not even clear how evacuated workers will be dealt with if the evacuation occurs during a freezing, stormy winter night. During discussions it was stated that "people will do what they have to do to rescue someone". This may be the case but there is likelihood in further escalating the emergency rather than resulting in a successful rescue. The whole purpose of an emergency response plan is to identify all potential emergencies (considering worst case scenario) and put a plan in place to mitigate any negative impacts from the emergency.

I am requesting that you review the emergency response plan (including emergency plan risk assessment) as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

An effective emergency response plan not only impacts East Coast Catering but also impacts other contractors at the site (such as Marine Contractors). As such, it is the responsibility of the Principal Contractor Emera to take the lead role in the development of a site specific emergency response plan.

If you have any questions or comments, please get in touch.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Hi Wilson,

As discussed, attached is our Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT for the Granite Canal Camp, revised to reflect the feedback received from Fire & Emergency Services (also attached).

As per my previous email, I will require clarification and/or suggestions regarding the training required for proper use of fire extinguishers. Also, as mentioned, there is no formal MOU in place between Emera NL and the Buchans Junction Volunteer Fire Department, simply a verbal agreement that they will respond in the event of an emergency.

Thanks again,

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@eccltd.ca
Sent: Wednesday, October 07, 2015 4:09 PM
To: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Cc:Section 40(1)
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Just a further update on the respirators....the WWTP Operator (who is currently on site) is now in possession of his respirator (it arrived on site yesterday evening). Myself and Section 40(1) will be heading to site on Tuesday, October 13th and will be hand-delivering the other WWTP Operator's respirator. He is not due to return to site until October 19th.

Regards,

{redacted}

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-06-15 1:05 PM
To:Section 40(1)
Cc:Section 40(1)
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update {redacted}

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: {redacted} @ecitd.ca
Sent: Tuesday, October 06, 2015 9:34 AM
To:Section 40(1) Roberts, Welson
Cc:Section 40(1)
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good morning Section 40(1) and Welson,

Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

{redacted}

From: {redacted}@emera.com
Sent: October-05-15 8:20 PM
To:Section 40(1)
Cc:Section 40(1)
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks...
Hi [Name]

Status of Orders are as follows:

**Order 0661639-01:**
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-02:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-03:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-04:**
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21st.

**Order 0661639-05:**
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29th and were due to arrive on site October 1st. Upon follow-up with site it was determined that they had not yet been delivered. On October 2nd, Acklands Grainger contacted [Name] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” – and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

**Order 0661639-06:**
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29th.

I will update you tomorrow once we have a response on the status of #05.

Thanks,

[Name]
Hi can you please provide a status update on all ECC OHS Orders?

Thanks,

Section 40(1)
Hi:

Have to agree, there are significant deficiencies with regard to what has been submitted.

John Morgan

OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
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Further to our recent teleconference with Emera and the email below (with attachments) I believe we need to further discuss the ERP for the Granite Canal site.

Wilson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Good morning, Welson. I hope you and your family had a terrific holiday season!

Myself and [redacted] have had a number of meetings since our last correspondence and believe that we have made significant progress in addressing your concerns. As a follow-up to Orders 661639 – 01 and 661639 – 03, I have attached the following documents for your consideration/review:

- Service NL Fire Life & Safety Approval Documentation for Granite Canal Camp
- Emergency Response Plan D-00095-00000-021 Rev 3 DRAFT C, revised to address your previous comments/suggestions and other improvement initiatives. Once we have received your approval, and the Camp is back up and running, all applicable staff will be trained on their specific duties/responsibilities outlined within the ERP.
- Granite Canal Emergency Response Risk Assessment
- Medical Response Consumables and Equipment Inventory
- Revised Rules of Conduct and Procedures for the Granite Canal Accommodations Facilities (now includes Section 3 – Emergency Procedures)

We have since received all of the certificates for the Fire Extinguisher training, so if you would like to see copies of these let me know and I'll forward you the scans. In addition, all fire extinguishers/suppression systems on site have been inspected and serviced accordingly by DASIT Recharging.

I trust that the above and attached is satisfactory, however please don’t hesitate to let me know if you require anything further.

Best regards,

[redacted]

---

Good Morning [redacted]

Thanks for the update. I'm in Central NL today so I won't be able to meet in St. John's. Order 661639 – 02 (fire extinguisher training) is closed. Good to hear that the emergency plan risk assessment has been completed. Please forward a copy of the completed risk assessment.

Order 661639 – 01 and 661639 – 03 are extended until December 31, 2015 based upon the fact that there is no work ongoing at the Granite Canal site.

I have no problem with meeting as suggested when updates are complete.
Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
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C/O Provincial Building  
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From: [Redacted]@emera.com
Sent: Thursday, December 03, 2015 11:00 AM
To: Roberts, Welson
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661539

Welson;

How are you doing? Are you in St. John’s today, perhaps and I could get together with you if you are. I am hoping to get out today before the snow hits, my flight is at 6:30pm so should be OK but I understand they are calling for 20-30 cm here in St. John’s starting late tonight.

With regard to Granite Canal, just wanted to make you aware, we have no work on site, all work is halted until the new year. At that time there will be contractors back to camp. This gives us the opportunity to get changes in place approved.

A risk assessment has been completed, is in the process of updating the Emergency Response Plan, he also wanted to inform you that the fire extinguisher training has been completed and certificates received.

We will keep you informed of progress, I will give you a call to set up a meeting with you once all updates are complete.

Have a safe & productive day!

www.emera.com

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: December-01-15 1:31 PM
To: [Redacted]
Good Afternoon

Could you please provide an update to orders 661639 – 01,02,03? It was my understanding from our conference call on Nov 12 that an emergency plan risk assessment would be conducted for the Granite Canal site. Once the assessment was complete, the emergency response plan would be updated. I am not sure of the present status with these matters.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
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Hi Wilson,

Apologies for any confusion...I just realized that in my haste I inadvertently addressed the below email to instead of you.

I want to also point out a minor mistake in comment #3 below – the position of Communications Coordinator has been eliminated entirely, with all previous functions falling under the ERP Coordinator and Fire Wardens. The revised ERP that I attached reflects this.

Best regards,

From: 
Sent: Friday, October 30, 2015 4:44 PM
To: ; 
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good afternoon
Apologies for providing a formal response until now but we wanted to make sure that your comments were addressed in sufficient detail to clearly display that we have taken these points extremely seriously and dedicated the resources and attention that this deserves. I have responded to each of the comments in bolded black font below:

Best regards,

---

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-29-15 1:54 PM
To: [Redacted]
Cc: McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola; Morgan, John; Browne, Aiden
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good Afternoon

Since our discussion I have further reviewed the Emergency Response Plan and have had a meeting with Blair Hogan of FES and a phone conversation with [Redacted]. Emera. Based upon the review and conversations I offer the following comments:

- There is no signed MOU with the Buchan’s Jct Fire Department and the Fire Department has very few fire fighters that can respond during the day (away working) and insufficient firefighting equipment to both respond to Granite Canal and provide firefighting services for the town. Buchans Junction is several hours travel time away from the Granite Canal site. Based on these facts, it is unlikely that the Buchans Junction Fire Department would not be able to provide an effective response to the Granite Canal site. The FL&SP Permit was issued to DORA by Service NL December 18, 2014, and copied to the Fire Commissioner. This incorporates any comments that the Fire Chief (Grand Falls Winsor) would have.

- Other than fire extinguishers, there is no firefighting equipment at the site. Workers have not been trained in fire extinguisher use and the emergency response plan indicates that the response is to evacuate. There are no emergency responders listed in the ERP for firefighting. DaSIT Recharging will be coming to site on Tuesday, November 3rd to provide this training for all staff. They will be doing the same for the other shift two weeks after (Nov 17). Monday was not possible due to our staff all changing out that day. [Redacted] suggested that Tuesday would be a better day anyway, due to Monday’s forecast calling for rain and the adverse effects this would have on the practical training exercises required. In addition to the training, [Redacted] is going to conduct an inspection on all existing extinguishers (even though they aren’t due for inspection this year, I figured this would be a good proactive measure). He is also going to conduct an inspection on the hood suppression system in the kitchen, and change out the required fuses and filters. A detailed equipment inventory has been taken (now Appendix D of the attached ERP), listing all fire extinguishers on site and their current locations. We will be requesting that DaSIT Recharging supply us with the outstanding fire extinguishers that have since been approved via Change Order during [Redacted] visit on Tuesday. ENL would like to set up a meeting with you next week discuss the Firefighting component in further detail, if possible.

- The medic is listed as the ERP Coordinator or the frontline person responsible for the management of an emergency. This is not appropriate or normally functionally possible as there is only one Medic. If there are ill or injured persons the Medic would have to deal with this aspect of the emergency and hence not be able to effectively manage the emergency response. The medic is an emergency responser. ECC’s Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT B (Attached) has been revised to reflect the change in roles – Medic is now Emergency Responder, Chef Manager is the ERP Coordinator and Maintenance Person is now Communications Coordinator.

- There is no critical supplies and equipment inventory. All fire extinguishers are being inspected by the Maintenance Person on a weekly basis. DaSIT will be performing a certifying inspection next week. As per above, attached inventory lists all fire suppression equipment.
- There are no mutual aid agreements to specify the response to be provided by outside agencies. **On Aug 18th**, ENL hosted a meet and greet with Buchans, Millertown Badger, Grand Falls. The attendees of this meeting were each towns Emergency Responder (i.e. Search and Rescue, Central Health, fire departments)

- The guidance for dealing with a mass/multiple casualty incident is lacking in appropriate detail. **There is a medic on site, regardless of the number of people staying in camp. Also, each one of the contractors has an ERP that will be used in the event of an emergency and people trained in emergency response.**

- The guidance for dealing with a severe weather emergency is lacking. **The Site has a dedicated backup generator with fuel for 4 days. Minimum 7-day par stock of food supplies is always maintained on site. ENL has an agreement with the snow clearing contractor to be able to clear the roads within a timely fashion.**

- The “crisis communications” guidance is lacking. **There is an ENL communication plan in place that is divided into level 1, 2, 3 events.**

- The guidance for emergency management exercise design is lacking. **We would like to discuss this further to identify deficiencies, if possible.**

I note that one extension has been granted until Oct 31, 2015 for review of the emergency response plan. This extension was granted based upon the fact that there was very little activity at the site (shut down due to work stand downs) and that East Coast Catering would need to consult with Fire and Emergency Services. Since that time activities have begun to ramp up at the camp site and it has become evident that there is inadequate firefighting capabilities and fire rescue capabilities. This has been discussed by phone today with [redacted] and he agrees that Emera will be taking a lead role in ensuring that there is an effective emergency response plan in place for the site. [Redacted] committed to immediately investigate the matter and to ensure that corrective actions are put in place. I advised [Redacted] and am now advising you of the urgent need to ensure that there is an effective emergency response plan in place. No further extension to orders 661639 – 01, 661639 – 02 and 661639 – 03 at this time. I am requesting that you review the emergency response plan (including emergency plan risk assessment) as soon as possible as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

Please provide a response to the review of the emergency response plan as soon as possible.

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430

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From: [redacted]@eccltd.ca  
Sent: Thursday, October 29, 2015 12:02 PM  
To: Roberts, Wilson  
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the feedback, Wilson...very valid points. What kind of approximate timeline are we looking at to complete this, would you say? You mentioned during our chat that these orders will need to been given extensions...
From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]  
Sent: October-28-15 4:05 PM  
To: Hogan, Blair; Browne, Aiden; McCurdy, Darlene; Carter, Doug; Martin, Denis; Morgan, John; Power, Loyola  
Cc:  
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639  

Thanks for the update

I have forwarded the ERP and comments from Fire and Emergency Services (FES) to individuals within the OH&S Division for review. I will provide further comments once this review is complete.

With respect to your question regarding fire extinguisher training, I believe that Martins Fire Safety (St. John’s) offers a fire extinguisher training course. I also note that FES also offers a two day Defensive Firefighting course which includes training on portable extinguishers.

Required resources (such as firefighting equipment) and training needs should have been identified during the emergency plan risk assessment. Response times to emergencies should have also been considered during the risk assessment. The expected response time for local emergency responders is not identified in the ERP but this will undoubtedly have an impact on the level of resources and training required at the site. The impact that adverse weather and road conditions must also be considered during the risk assessment process. For instance, we know that the Buchans Jct Fire Department may take several hours to reach the site (even longer during a stormy winter night), but there does not seem to be a clear plan in place to deal with the situation of someone being unable to evacuate from a smoke filled or burning camp building. In this case, a rescue is required ASAP but it is not clear from the plan how this will take place. It is not even clear how evacuated workers will be dealt with if the evacuation occurs during a freezing, stormy winter night. During discussions it was stated that "people will do what they have to do to rescue someone". This may be the case but there is likelihood in further escalating the emergency rather than resulting in a successful rescue. The whole purpose of an emergency response plan is to identify all potential emergencies (considering worst case scenario) and put a plan in place to mitigate any negative impacts from the emergency.

I am requesting that you review the emergency response plan (including emergency plan risk assessment) as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

An effective emergency response plan not only impacts East Coast Catering but also impacts other contractors at the site (such as Marine Contractors). As such, it is the responsibility of the Principal Contractor Emera to take the lead role in the development of a site specific emergency response plan.

If you have any questions or comments, please get in touch.

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From: [redacted]@eccltd.ca
Sent: Wednesday, October 28, 2015 12:38 PM
To: Roberts, Weison; Hogan, Blair
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Hi Weison,

As discussed, attached is our Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT for the Granite Canal Camp, revised to reflect the feedback received from Fire & Emergency Services (also attached).

As per my previous email, I will require clarification and/or suggestions regarding the training required for proper use of fire extinguishers. Also, as mentioned, there is no formal MOU in place between Emera NL and the Buchans Junction Volunteer Fire Department, simply a verbal agreement that they will respond in the event of an emergency.

Thanks again,

[logo]

From: Roberts, Weison [mailto:welsonroberts@gov.nl.ca]
Sent: October-08-15 3:32 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update. Order 661639 – 05 is closed.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@eccltd.ca
Sent: Wednesday, October 07, 2015 4:09 PM
Just a further update on the respirators....the WWTP Operator (redacted) currently on site is now in possession of his respirator (it arrived on site yesterday evening). Myself and [redacted] will be heading to site on Tuesday, October 13th and will be hand-delivering the other WWTP Operator's respirator. He is not due to return to site until October 19th.

Regards,

From: Roberts, Welson (mailto:welsonroberts@gov.nl.ca)
Sent: October-06-15 1:05 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
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From: [redacted] (mailto:[redacted])
Sent: Tuesday, October 06, 2015 9:34 AM
To: Roberts, Welson
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good morning [redacted] and Welson;

Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

From: [redacted] (mailto:[redacted])
Sent: October-05-15 8:20 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks.
From: [redacted]@emera.com
Sent: October-05-15 5:42 PM
To: [redacted]
Cc: 
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi,

Status of Orders are as follows:

**Order 0661639-01:**
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-02:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-03:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-04:**
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21st.

**Order 0661639-05:**
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29th and were due to arrive on site October 1st. Upon follow-up with site it was determined that they had not yet been delivered. On October 2nd, Acklands Grainger contacted [redacted] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” – and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

**Order 0661639-05:**
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29th.

I will update you tomorrow once we have a response on the status of #05.

Thanks,

From: [redacted]@emera.com
Sent: October-05-15 2:48 PM
To: [redacted]
Cc: 
Subject: FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Hi, can you please provide a status update on all ECC OHS Orders?

Thanks,
Good Afternoon

Thanks for the update. Your email and submitted documents are presently being reviewed. It is expected that further comments will be provided by the end of the week.

Welson Roberts, CRSP
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Good morning, Welson. I hope you and your family had a terrific holiday season!

Myself and [redacted] have had a number of meetings since our last correspondence and believe that we have made significant progress in addressing your concerns. As a follow-up to Orders 661639 – 01 and 661639 – 03, I have attached the following documents for your consideration/review:

- Service NL Fire Life & Safety Approval Documentation for Granite Canal Camp
- Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT C, revised to address your previous comments/suggestions and other improvement initiatives. Once we have received your approval, and the Camp is back up and running, all applicable staff will be trained on their specific duties/responsibilities outlined within the ERP.
- Granite Canal Emergency Response Risk Assessment
- Medical Response Consumables and Equipment Inventory
- Revised Rules of Conduct and Procedures for the Granite Canal Accommodations Facilities (now includes Section 3 – Emergency Procedures)
We have since received all of the certificates for the Fire Extinguisher training, so if you would like to see copies of these let me know and I’ll forward you the scans. In addition, all fire extinguishers/suppression systems on site have been inspected and serviced accordingly by DASIT Recharging.

I trust that the above and attached is satisfactory, however please don’t hesitate to let me know if you require anything further.

Best regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: December-03-15 1:01 PM
To: [Redacted] ; McCurdy, Darlene <darcinemccurdy@gov.nl.ca>; Power, Loyola <loyolapower@gov.nl.ca>; Browne, Aiden <brownea@gov.nl.ca>; Morgan, John <morgan@gov.nl.ca>; Martin, Denis <martind@gov.nl.ca>; Carter, Doug <dcarter@gov.nl.ca>
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good Morning

Thanks for the update. I’m in Central NL today so I won’t be able to meet in St. John’s. Order 661639 – 02 (fire extinguisher training) is closed. Good to hear that the emergency plan risk assessment has been completed. Please forward a copy of the completed risk assessment.

Order 661639 – 01 and 661639 – 03 are extended until December 31, 2015 based upon the fact that there is no work ongoing at the Granite Canal site.

I have no problem with meeting as suggested when updates are complete.

Welson Roberts, CRSP
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From: [Redacted] @emera.com
Sent: Thursday, December 03, 2015 11:00 AM
To: Roberts, Welson
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Welson;

How are you doing? Are you in St. John’s today, perhaps and I could get together with you if you are. I am hoping to get out today before the snow hits, my flight is at 6:30pm so should be OK but I understand they are calling for 20-30 cm here in St. John’s starting late tonight.
With regard to Granite Canal, just wanted to make you aware, we have no work on site, all work is halted until the new year. At that time there will be contractors back to camp. This gives us the opportunity to get changes in place approved.

A risk assessment has been completed and is in the process of updating the Emergency Response Plan, he also wanted to inform you that the fire extinguisher training has been completed and certificates received.

We will keep you informed of progress, I will give you a call to set up a meeting with you once all updates are complete.

Have a safe & productive day!

Emma
www.emera.com

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: December-01-15 1:31 PM
To: 
Cc: McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola; Morgan, John; Browne, Aiden;

Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good Afternoon

Could you please provide an update to orders 661639 – 01,02,03? It was my understanding from our conference call on Nov 12 that an emergency plan risk assessment would be conducted for the Granite Canal site. Once the assessment was complete, the emergency response plan would be updated. I am not sure of the present status with these matters.

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Hi Welson,

Apologies for any confusion... I just realized that in my haste I inadvertently addressed the below email to Harris instead of you.

I want to also point out a minor mistake in comment #3 below - the position of Communications Coordinator has been eliminated entirely, with all previous functions falling under the ERP Coordinator and Fire Wardens. The revised ERP that I attached reflects this.

Best regards,

Good afternoon

Apologies for providing a formal response until now but we wanted to make sure that your comments were addressed in sufficient detail to clearly display that we have taken these points extremely seriously and dedicated the resources and attention that this deserves. I have responded to each of the comments in bolded black font below:

Best regards,

Good afternoon

Since our discussion I have further reviewed the Emergency Response Plan and have had a meeting with Blair Hogan of FES and a phone conversation with [Name of Emera]. Based upon the review and conversations I offer the following comments:

There is no signed MOU with the Buchan's Jct Fire Department and the Fire Department has very few fire fighters that can respond during the day (away working) and insufficient firefighting equipment to both respond to Granite Canal and provide firefighting services for the town. Buchans Junction is several hours travel time away from the Granite Canal site. Based on these facts, it is unlikely that the Buchans Junction Fire Department would not be able to provide an effective response to the Granite Canal site. The FL&S Permit was issued to
DORA by Service NL December 18, 2014, and copied to the Fire Commissioner. This incorporates any comments that the Fire Chief (Grand Falls Winsor) would have.

Other than fire extinguishers, there is no firefighting equipment at the site. Workers have not been trained in fire extinguisher use and the emergency response plan indicates that the response is to evacuate. There are no emergency responders listed in the ERP for firefighting. DaSIT Recharging will be coming to site on Tuesday, November 3rd to provide this training for all staff. They will be doing the same for the other shift two weeks after (Nov 17). Monday was not possible due to our staff all changing out that day. suggested that Tuesday would be a better day anyway, due to Monday’s forecast calling for rain and the adverse effects this would have on the practical training exercises required. In addition to the training, is going to conduct an inspection on all existing extinguishers (even though they aren’t due for inspection this year, I figured this would be a good proactive measure). He is also going to conduct an inspection on the hood suppression system in the kitchen, and change out the required fuses and filters. A detailed equipment inventory has been taken (now Appendix D of the attached ERP), listing all fire extinguishers on site and their current locations. We will be requesting that DaSIT Recharging supply us with the outstanding fire extinguishers that have since been approved via Change Order during visit on Tuesday. ENL would like to set up a meeting with you next week discuss the Firefighting component in further detail, if possible.

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There is no critical supplies and equipment inventory. All fire extinguishers are being inspected by the Maintenance Person on a weekly basis. DaSIT will be performing a certifying inspection next week. As per above, attached inventory lists all fire suppression equipment.

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fire rescue capabilities... This has been discussed by phone today with [REDACTED] and he agrees that Emera will be taking a lead role in ensuring that there is an effective emergency response plan in place for the site. [REDACTED] committed to immediately investigate the matter and to ensure that corrective actions are put in place. I advised [REDACTED] and am now advising you of the urgent need to ensure that there is an effective emergency response plan in place. No further extension to orders 661639 – 01, 661639 – 02 and 661639 – 03 at this time. I am requesting that you review the emergency response plan (including emergency plan risk assessment) as soon as possible as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

Please provide a response to the review of the emergency response plan as soon as possible.

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From: [REDACTED] (pgc@ecctd.ca)
Sent: Thursday, October 29, 2015 12:02 PM
To: Roberts, Welson
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the feedback, Welson... very valid points. What kind of approximate timeline are we looking at to complete this, would you say? You mentioned during our chat that these orders will need to been given extensions...

Regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-28-15 4:05 PM
To: [REDACTED] Hogan, Blair; Browne, Aidan; McCurdy, Darlene; Carter, Doug; Martin, Denis; Morgan, John; Power, Loyola
Cc: [REDACTED]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update. I have forwarded the ERP and comments from Fire and Emergency Services (FES) to individuals within the OHS Division for review. I will provide further comments once this review is complete.

With respect to your question regarding fire extinguisher training, I believe that Martins Fire Safety (St. John’s) offers a fire extinguisher training course. I also note that FES also offers a two day Defensive Firefighting course which includes training on portable extinguishers.

Required resources (such as firefighting equipment) and training needs should have been identified during the emergency plan risk assessment. Response times to emergencies should have also been considered during the risk assessment. The expected response time for local emergency responders is not identified in the ERP but this will
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I am requesting that you review the emergency response plan (including emergency plan risk assessment) as a means of ensuring that all potential emergencies are identified, required resources are outlined, training is in place and procedures are developed and implemented.

An effective emergency response plan not only impacts East Coast Catering but also impacts other contractors at the site (such as Marine Contractors). As such, it is the responsibility of the Principal Contractor Emera to take the lead role in the development of a site specific emergency response plan.

If you have any questions or comments, please get in touch.

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From: [redacted]@ecnl.ca
Sent: Wednesday, October 28, 2015 12:38 PM
To: Roberts, Welson; Hogan, Blair
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639
Importance: High

Hi Welson,

As discussed, attached is our Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT for the Granite Canal Camp, revised to reflect the feedback received from Fire & Emergency Services (also attached).

As per my previous email, I will require clarification and/or suggestions regarding the training required for proper use of fire extinguishers. Also, as mentioned, there is no formal MOU in place between Emera NL and the Buchans Junction Volunteer Fire Department, simply a verbal agreement that they will respond in the event of an emergency.

Thanks again,
From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-08-15 3:32 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update. Order 661639-05 is closed.

Welson Roberts, CRSP
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To: Roberts, Welson; [Redacted]
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Just a further update on the respirators...the WWTP Operator (Full Name Redacted) currently on site is now in possession of his respirator (it arrived on site yesterday evening). Myself and [Redacted] will be heading to site on Tuesday, October 13th and will be hand-delivering the other WWTP Operator, [Full Name Redacted] respirator. He is not due to return to site until October 19th.

Regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-06-15 1:05 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks for the update.

Welson Roberts, CRSP
From: [redacted]@eccldc.ca
Sent: Tuesday, October 06, 2015 9:34 AM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Good morning [redacted] and [redacted],

Just a quick update on the respirators – I have received confirmation that they were shipped via UPS on Friday (after not shipping on Tuesday, as promised by Acklands Grainger) and landed in Grand Falls yesterday, out for delivery to Millertown today. I will provide a final update once they are confirmed to be on site.

Regards,

From: [redacted]@emera.com
Sent: October-05-15 8:20 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Thanks

From: [redacted]
Sent: October-05-15 5:42 PM
To: [redacted]
Cc: [redacted]
Subject: RE: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi [redacted],

Status of Orders are as follows:

**Order 0661639-01:**
Blair Hogan, Regional Emergency Management Planning Officer at Fire and Emergency Services in Grand Falls-Windsor, has reviewed ECC’s Project-Specific Emergency Response Plan (ENL Doc.# D-00HS-0-700-00-021) with the Emergencies Services side of the FES-NL division and forwarded to the Fire Protection side for further review. Because of the delays beyond our control, OH&S has granted us an extension until October 31st, 2015.

**Order 0661639-02:**
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.
Order 0661639-03:
Due to its direct relation to the above pending ERP review and recommendations, OH&S has granted us an extension until October 31st, 2015.

Order 0661639-04:
All emergency eye wash stations have been assessed and confirmed to be easily accessible. This order was closed by OH&S on September 21st.

Order 0661639-05:
Two size Medium Full Face 3M 6000 series masks with 3M combination filters were purchased through Acklands Grainger on Tuesday, September 29th and were due to arrive on site October 1st. Upon follow-up with site it was determined that they had not yet been delivered. On October 2nd, Acklands Grainger contacted [REDACTED] and, while apologizing profusely, advised that the units did not ship from their warehouse as scheduled – there was a “mix-up in their shipping department” – and assured him that they were shipped that day. As of today they had not arrived on site, however we are hoping that they will be there tomorrow. Upon confirmation of receipt this order should be closed by OH&S.

Order 0661639-06:
Qualitative Fit Testing has been completed for both WWTP Operators. This order was closed by OH&S on September 29th.

I will update you tomorrow once we have a response on the status of #05.

Thanks,

---

From: [REDACTED]@emera.com
Sent: October-05-15 2:48 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: OH&S Inspection at Granite Canal Camp, Ref# 0661639

Hi [REDACTED] can you please provide a status update on all ECC OHS Orders?

Thanks,

---

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Wilson:
I just returned from St. John’s today and will be returning out there next week. I will discuss this further with Derek next week as time did not permit on my last trip. I will follow-up with you once Derek is brought up to speed.
Regards

Sent from my BlackBerry 10 smartphone on the Bell network.

Good Afternoon Linus,

I was wondering if you are able to provide a response to the email below? I have some major concerns with the Emergency Response Plan (ERP) as submitted by Emera and East Coast Catering for the Granite Canal site. The site is very remote and by road travel it would take approximately three hours from Buchans (nearest fire department). There is a 100 person two-story camp at the site which includes a kitchen and bunkhouses for various contractors. The focus of the ERP when it comes to response to a fire is to evacuate the camp. The only fire fighting equipment listed in the ERP are fire extinguishers (no hoses, bunker gear, scba’s, mobile extinguishers, etc). There is no indication in the plan how a rescue would occur in the event that a person in the camp is unable to evacuate by themselves or with the help of a fire warden. Attachments to the plan detail a situation where a conscious trapped person would shut their room door, place towels around the door to prevent smoke from entering and a blanket out the window to notify others outside that they are trapped. There is no indication in the plan however detailing how a rescue would occur. There is also no plan to deal with an event where a person may be unconscious or does not evacuate to the muster point (maybe unconscious or simply in room asleep and not hear the alarm). There are no search procedures in these circumstance where smoke or fire may impede search by a fire warden. There is no fire department to respond and no procedures for fire fighting or rescue.

I have other concerns with the ERP including lack of details around emergency road transportation, no details around mustering outside until help arrives at an isolated site in windy, extreme cold winter conditions and few details around multiple casualty incidents.

I feel that this matter is very concerning and I am again requesting the involvement of Fire and Emergency Services (FES) with this matter. Please advise if FES will have any involvement with this file.

If you have any questions or comments, please get in touch.

Walson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
Good Morning Linus,

As a follow-up to our phone conversation a moment ago, I am wondering if it would be possible to arrange a visit to the granite canal site with FES to conduct a joint inspection. East Coast Catering and Emera have submitted a revised ERP to our Division and we would like to visit the site with you guys to review the ERP. I realize that you are with the fire side of your Division so it would be good if we could also have someone from the emergency planning side of your Division also join us on the inspection. From our side we are planning that myself and Aiden Browne (OHS Officer III for Construction) will visit the site. The request for a joint inspection stems from a conference call we had this morning with our management group (including Director) regarding the Granite Canal ERP.

We would like to visit the site as soon as possible. If a joint inspection is possible, please get in touch so that we can make arrangements.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Good morning, Welson.

I have advised our Camp Manager, [Redacted] that you intend to be on site around 11:00 AM on Friday. Please advise if you plan on staying overnight so we can have the appropriate number of room(s) ready.

Before you enter the Access Road, please call [Redacted] to let him know your location and intended arrival time. Leave a message if he doesn’t answer, as he may be in the kitchen when you call.

Attached for your reference is a copy of ENL’s Safe Work Procedure for Access Road Driving. If you do not have a VHF radio, that is fine...just be sure to call the number above so that the appropriate response can be initiated if you do not arrive in time.

In speaking with [Redacted], he will be reaching out to you shortly to advise on the ENL representatives that will be accompanying you during your visit.

Thanks and safe travels.

Good morning [Redacted].

I wanted to let you know that Linus Tremblett (Fire and Emergency Services) and I plan to visit the Granite Canal camp site this coming Friday, January 29. We plan to leave Badger at 8:00 a.m. so we will probably arrive at the site near 11:00 a.m. There may be one other person from our St. John’s office joining us on the site visit but I am not sure at this point. If you plan to have someone travel to the site with us we can possibly meet them in Badger or along the route. Is there a phone # that we are supposed to contact on Friday prior to travelling over the roadway?

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Good Afternoon

As discussed by phone, please see the attached Inspection Report for the inspection conducted at the Granite Canal site this past Friday. Please sign for receipt of the report in the place marked with an “X” and return by fax or email.

If you have any questions or comments, please get in touch.

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430

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Good Afternoon

Please see attached Inspection / Officer’s Report for the inspection conducted at Granite Canal this past Friday. Please sign for receipt of the report on the line marked with an “X” and return a copy of the signed page. As referenced in the inspection report, a separate report will be issued by Fire Protection Officer Linus Tremblett with respect to his findings during the site visit. Mr. Tremblett can be contacted by phone at 292-4414.

If you have any questions or comments regarding my report, please get in touch.

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

Toll Free: 1-800-563-5471
Accident Reporting: 729-4444

INSPECTION / OFFICER'S REPORT

EAST COAST CATERING LTD / O'CA
30 QUEENS ROAD
ST. JOHN'S
NL

A1C-2A5

Worksite: Maritime Link Project
Location: Granite Canal, NL

Employer Co-Chair: Blacked out
Employee Co-Chair: Blacked out
Worker Rep/Designate: N/A

Section 40(1)

Employees: 6

NIC: 9214
Insp. Time: 10:30AM

Section 40(1)

Section 40(1)

Report:

Reference Inspection 661639

Arrived on site on January 29, 2016 with Fire Protection Officer Linus Trembllett (Fire and Emergency Services) to conduct a follow-up to order 661639 - 01 [review of Emergency Response Plan (ERP) by Fire and Emergency Services] and 661639 - 02 (training in ERP). We were joined on the site with Emera and met with Camp Manager Blacked out.

This written report is compiled on February 1, 2016. A separate report will be issued to Emera by Mr. Trembllett with respect to fire and emergency services issues identified during the site visit.

At the time of the inspection there were six workers at the site including water treatment operator, kitchen staff and a nurse. It is expected that the numbers of workers at the site will ramp up in the near future as transmission line and switch yard construction activities increase.

The inspection revealed that there is no fire department response for the site despite references in the emergency response plan to a fire department. There is a dry hydrant at the site meant for drafting water from the canal water supply with a fire truck but there is no fire truck. There is presently no means at the site of supplying water for fire suppression. There is a potable water supply at the site and water in the hydro canal but no means of connecting either supply to a fire suppression system (i.e. no connecting devices, no hoses, no portable pumps, etc). In the event that a person becomes trapped in a dorm room and fire wardens are unable to get to the dorm room from the inside, there is a plan to place a portable ladder to the dorm room window from the outside to rescue the worker. This rescue procedure is not identified in the emergency response plan. Blacked out state the the focus of the plan to date has been to evacuate workers from the camp in the event of an emergency.

The inspection also revealed that several self closing fire rated doors were blocked open in a manner that would allow smoke or fire to travel unimpeded from the kitchen unit to the dorm rooms. Blocking the doors in this manner takes away the fire rating of the various building areas. At least one exit door does not have panic hardware installed and is locked. The door for the main electrical room in the dorms does not have a self closing device installed. There is an opening in the electrical room wall where conduits pass through the wall. The building is equipped with a fire alarm system but an inspection report for the system is not available.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
Serviced fire extinguishers are available and workers have been trained in the use of fire extinguishers. The site reports that emergency lighting, first aid kits, eye wash stations and exits are checked on a regular basis. Additionally, the plan states that all high risk activities stop during periods of adverse weather where emergency evacuation by air or road transportation may not be possible (e.g. severe winter storms). The ERP makes reference to the use of a road ambulance service but other details around the service are unclear (where located, response time, contact numbers, etc.). The plan does not address any need for an emergency transportation vehicle located at the site.

No orders are issued by the undersigned officer for deficiencies identified in the above paragraphs as Mr. Tremblett will be issuing a report to address these deficiencies. However, the undersigned officer is requesting that the emergency response plan be updated to reflect plans for fire suppression with water, rescue, and emergency road transportation (including dedicated emergency transportation vehicle). The revised ERP shall also address any deficiencies identified in Mr. Tremblett’s report. A copy of the updated plan shall be forwarded to the undersigned officer along with confirmation that workers have been trained in the new plan.

No new orders issued.

Received By: [Signature]

Position: [Signature]

Officer’s Name: [Signature] Roberts, Welson

Date: FEB 1, 2016

Time: 2:16PM

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
Good day Welson,

Please see enclosed signed copy received.

From: ecc@eccltd.ca [mailto:ecc@eccltd.ca]
Sent: Monday, February 01, 2016 4:16 PM
To: Roberts, Welson
Subject: Message from KM_364_ECC
Arrived on site on January 29, 2016 with Fire Protection Officer Linus Trembllett (Fire and Emergency Services) to conduct a follow-up to order 661639 - 01 [review of Emergency Response Plan (ERP) by Fire and Emergency Services] and 661639 - 02 (training in ERP). We were joined on the site by [redacted] with Emera and met with Camp Manager [redacted].

This written report is compiled on February 1, 2016. A separate report will be issued to Emera by Mr. Trembllett with respect to fire and emergency services issued identified during the site visit.

At the time of the inspection there were six workers at the site including water treatment operator, kitchen staff and a nurse. It is expected that the numbers of workers at the site will ramp up in the near future as transmission line and switch yard construction activities increase.

The inspection revealed that there is no fire department response for the site despite references in the Emergency response plan to a fire department. There is a dry hydrant at the site meant for drafting water from the canal water supply with a fire truck but there is no fire truck. There is presently no means at the site of supplying water for fire suppression. There is a potable water supply at the site and water in the hydro canal but no means of connecting either supply to a fire suppression system (i.e. no connecting devices, no hoses, no portable pumps, etc). In the event that a person becomes trapped in a dorm room and fire wardens are unable to get to the dorm room from the inside, there is a plan to place a portable ladder to the dorm room window from the outside to rescue the worker. This rescue procedure is not identified in the emergency response plan. [Redacted] state the the focus of the plan to date has been to evacuate workers from the camp in the event of an emergency.

The inspection also revealed that several self closing fire rated doors were blocked open in a manner that would allow smoke or fire to travel unimpeded from the kitchen unit to the dorm rooms. Blocking the doors in this manner takes away the fire rating of the various building areas. At least one exit door does not have panic hardware installed and is locked. The door for the main electrical room in the dorms does not have a self closing device installed. There is an opening in the electrical room wall where conduits pass through the wall. The building is equipped with a fire alarm system but an inspection report for the system is not available.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
Serviced fire extinguishers are available and workers have been trained in the use of fire extinguishers. Reports that emergency lighting, first aid kits, eye wash stations and exits are checked on a regular basis. Additionally, state that all high risk activities stop during periods of adverse weather where emergency evacuation by air or road transportation may not be possible (e.g. severe winter storms). The ERP makes reference to the use of a road ambulance service but other details around the service are unclear (where located, response time, contact numbers, etc). The plan does not address any need for an emergency transportation vehicle located at the site.

No orders are issued by the undersigned officer for deficiencies identified in the above paragraphs as Mr Tremblett will be issuing a report to address these deficiencies. However, the undersigned officer is requesting that the emergency response plan be updated to reflect plans for fire suppression with water, rescue, and emergency road transportation (including dedicated emergency transportation vehicle). The revised ERP shall also address any deficiencies identified in Mr. Tremblett's report. A copy of the updated plan shall be forwarded to the undersigned officer along with confirmation that workers have been trained in the new plan.

No new orders issued.

---

Received By: [Redacted]

Position: [Redacted]

Officer's Name: [Redacted]

Date: FEB 1, 2016

Time: 2:16 PM

Roberts, Wilson

---

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
From: Tremblett, Linus
Sent: Tuesday, February 09, 2016 9:42 AM
To: Roberts, Welson
Subject: RE: ERP for Granite
Attachments: Granite Canal Operations Facility.doc

Can you forward emails to your list below so I can send my report? As well do you have an email for [Redacted]

Thanks Wilson

Linus Tremblett
Fire Protection Officer I
Fire & Emergency Services
Provincial Building, 3 Cromer Avenue
Grand Falls-Windsor, NL
A2A 1W9
Phone - 709-292-4414
Fax - 709-292-4415

"In an emergency situation, you don’t rise to the occasion; you fall back to your level of training”
For more information on fire safety planning, visit http://www.gov.nl.ca/fes

From: Roberts, Welson
Sent: Monday, February 01, 2016 3:47 PM
To: Tremblett, Linus
Subject: FW: ERP for Granite

FYI.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: Roberts, Welson
Sent: Monday, February 01, 2016 2:38 PM
To: [Redacted]
Cc: Browne, Aiden; Morgan, John; McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola
Subject: ERP for Granite

Good Afternoon [Redacted]

Please see attached Inspection / Officer’s Report for the inspection conducted at Granite Canal this past Friday. Please sign for receipt of the report on the line marked with an “x” and return a copy of the signed page. As referenced in the
inspection report, a separate report will be issued by Fire Protection Officer Linus Tremblett with respect to his findings during the site visit. Mr. Tremblett can be contacted by phone at 292-4414.

If you have any questions or comments regarding my report, please get in touch.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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February 02, 2016

Section 40(1)

East Coast Catering Ltd
30 Queens Road
St. John's, NL, A1C 2A5

Re: Granite Canal Maritime Link Project Site

Dear [Name]

In the interest of Fire Prevention and Life Safety, a fire protection overview and inspection of the above noted facility was conducted on January 29, 2016 by the undersigned accompanied by Mr. Wilson Roberts, OH&S Inspector. The site visit was conducted as a follow-up to concerns of Fire & Life Safety Policies with the facility by Services NL, OH&S Inspection Branch order 661639-01, 02.

The following discrepancies were noted:

1. **Exterior:** The garbage dumpster is placed adjacent to the facility.

2. **Fire Alarm System:** A copy of the Fire Alarm System inspection report was not available at the time of the inspection.

3. **Means of Egress:** The smoke barrier doors leading from the exit corridors are held in the open position by the use of wooden wedges that are required to be kept closed.

4. **Electrical Rooms:** There are penetrations in the required fire separation of the electrical rooms (i.e. wire runs)

5. **Electrical Rooms:** The Electrical room is being used for storage.

6. **Service Rooms:** There are no self-closures on the utility and electrical room doors as required.

7. **Fire Suppression Equipment:** The facility has no fire protection equipment in place at the site. (i.e. portable pumps/fire hose)

8. **Exit Door:** The exit door in the center of the sleeping room does not have the required exit hardware and the door is locked.

P.O. Box 8700, 25 Hallett Crescent, St. John's, NL A1B 4J6 Telephone (709) 729-6794 Fax (709) 729-5609
9. **Sleeping Room Windows:** Windows used as a secondary means of egress require the use of a latch to open the window for egress in the event of an emergency.

Recommendations to the above noted discrepancies are as follows:

1. **Exterior:** Combustible materials shall not be stored on a roof or adjacent to any building so as to create a fire hazard to the building or its occupants. Access areas shall be provided to facilitate firefighting operations and shall be maintained free of obstruction in accordance with the *National Fire Code of Canada* section 2.5.1.5. It is recommended that the dumpster be placed a minimum of 25’ from the facility.

2. **Fire Alarm System:** That where a fire alarm system, has been installed, it shall be inspected to ensure proper operation and location. This inspection shall be performed by a service company listed and licensed by Fire & Emergency Services (Office of the Fire Commissioner). A copy of all inspection certificates (where applicable) shall be forwarded to Fire & Emergency Services (Office of the Fire Commissioner).

3. **Means of Egress:** Any doors that pass through a fire separation shall be fire rated for 20 minutes. These doors shall be “ULC” Listed and Tagged, installed in a steel frame, and equipped with a self-closing and latching device. A door leaf normally required to be kept closed shall not be secured in the open position at any time and shall be self-closing or automatic-closing in accordance with Chapter 7 of the NFPA 101 Life Safety Code.

4. **Electrical Rooms:** That the penetrations in the required fire separation be repaired with a material that provides a 1 hour fire separation as required by the *National Building Code of Canada*.

5. **Electrical Rooms:** The Electrical room is designed in accordance with the *National Building Code of Canada* as being fire rated and must not be used for storage at any time. Combustible materials in and around buildings shall not be permitted to accumulate in quantities or locations that will constitute an undue fire hazard. The room should receive housekeeping to correct the deficiency.

6. **Service Rooms:** These doors shall be installed in steel frames and equipped with a heavy duty self-closing device and a positive latch.

7. **Fire Suppression Equipment:** Taking into consideration the fact that there will be no Fire Department response to this site, it is strongly recommended that fire protection equipment be placed at the site. (i.e. portable pumps/fire hose, appliances) in order to provide emergency fire suppression and protection in case of fire involving infrastructure and or occupants at the site. Members of the ERT should have basic training in the use of the equipment and the equipment should be accessible at all times that the facility is occupied.
8. **Exit Door:** That Exit Doors be installed in accordance with Chapter 7 of *NFPA 101, Life Safety Code*. Two Exits are required and shall be separated by at least \( \frac{1}{2} \) the diagonal distance of the area that they serve. Exit doors shall swing in the direction of exit travel. In addition, if the occupant load of the facility exceeds 100 persons all exit doors shall be equipped with panic hardware and an exit sign.

9. **Sleeping Room Windows:** That except where a bedroom door provides access directly outside, each bedroom shall have one outside window able to be opened from the inside. Windows shall provide an unobstructed opening of not less than 510mm in width, 610 mm in height and 0.53 m² in area. It is strongly recommended that a clearly visible sign be posted adjacent to the windows locking latch with instructions of use and that all occupants be made familiar with its operation and reflected in the Fire Emergency Plan and Orientation Procedures.

We recommend that corrective action be started immediately and that in ten (10) calendar days of receipt of this letter, this office be notified, in writing, outlining your proposed action and completion date. Further, we request all discrepancies be corrected within a reasonable period of time, and this office and the OH&S Inspections Branch be notified, on a monthly basis, of your progress.

Yours truly,

[Signature]

Linus Tremblett
**Fire Protection Officer I**

cc Mr. Wilson Roberts, OH&S Inspector
Section 40(1)

Services NL, Gander
Blair Hogan, REMPO, FES-NL
Derek Simmons, Director of Fire Services, Fire Commissioner
Appreciate it, Welson!

On Feb 15, 2016, at 1:54 PM, Roberts, Welson <welsonroberts@gov.nl.ca> wrote:

Good Afternoon

I am not aware whether Linus Trembllett has submitted his report to Emera or not. I have copied Linus on this email so that you can contact him directly.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Good afternoon, Welson. To date, we have yet to receive a copy of the Fire Protection Officer's report referenced in your Inspection Officer's Report dated Feb 1, 2016. Would you happen to know if Mr. Trembllett has distributed his report to Emera NL yet? ECC has since addressed a number of items that were mentioned in your report, however we will need to be kept in the loop on the fire suppression, rescue and emergency road transportation details in order to properly update the ERP.

Any update/guidance would be appreciated.

Regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: February-01-16 2:38 PM
To: [Redacted]
Cc: Browne, Aiden; Morgan, John; McCurdy, Darlene; Carter, Doug; Martin, Denis; Power, Loyola
Subject: ERP for Granite

Good Afternoon [Redacted]

Please see attached Inspection / Officer's Report for the inspection conducted at Granite Canal this past Friday. Please sign for receipt of the report on the line marked with an "x" and return a copy of the signed page. As referenced in the inspection report, a separate report will be issued by Fire Protection Officer Linus Tremblett with respect to his findings during the site visit. Mr. Tremblett can be contacted by phone at 292-4414.

If you have any questions or comments regarding my report, please get in touch.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Good Morning

Did you want to discuss this? I included it in my last inspection report and have discussed with

Dedicated vehicle?

East Coast Catering/Amik Catering

On Mar 2, 2016, at 7:57 PM, Roberts, Welson <welsonroberts@gov.nl.ca> wrote:

Good Afternoon

Thanks for the update. It is good to hear that ECC and ENL are moving ahead with the provision of fire protection equipment and training on site that will facilitate fire suppression activities in the event that a camp occupant requires rescuing.

As requested in Inspection Officer’s Report 661686 please provide a copy of the updated emergency response plan which reflects plans for fire suppression with water, rescue, and emergency road transportation (including dedicated emergency transportation vehicle).

If you have any questions or comments, please get in touch.

Wilson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: Tremblett, Linus
Sent: Wednesday, March 02, 2016 2:01 PM
To:
Cc: Roberts, Wilson; Hogan, Blair; ECC Granite Lake Manager;
Subject: RE: Inspection Report

Thank you for your quick response and attention to the Fire Protection issues associated with this matter. This certainly reflects the concern your company and those you engage in your operations has towards Fire Prevention and Life Safety.

I have attached your response to our file and look forward to future correspondence.

If there is anything further we can do during your occupancy and operations period at the site we are more than willing to assist.

Regards.

Linus Tremblett
Fire Protection Officer I
Fire & Emergency Services
Provincial Building, 3 Cromer Avenue
Grand Falls-Windsor, NL
A2A 1W9
Phone - 709-292-4414
Fax - 709-292-4415

"In an emergency situation, you don’t rise to the occasion; you fall back to your level of training."
For more information on fire safety planning, visit http://www.gov.nl.ca/fes

From: [Email Address]
Sent: Friday, February 26, 2016 4:02 PM
To: Tremblett, Linus
Cc: Roberts, Wilson; Hogan, Blair; ECC Granite Lake Manager;
Subject: RE: Inspection Report
Importance: High

Good afternoon Linus,

Attached is East Coast Catering’s formal response to your Granite Canal Accommodations Facilities inspection report recommendations. I will continue to update you as each of the outstanding items are addressed. In the meantime, please do not hesitate to contact me directly if you have any questions or concerns.

Please feel free to distribute to any appropriate parties I may have excluded from this correspondence.

Best regards,
From: Tremblett, Linus [mailto:ltremblett@gov.nl.ca]
Sent: February-18-16 10:25 AM
To: 
Cc: 
Subject: Inspection Report

Good Day Gentleman:
Sorry for the delay on this but attached you will find a copy of my report as discussed on site at Granite canal.
Please feel free to call at any time regarding Fire & Life safety Issues.

Linus Tremblett
Fire Protection Officer I
Fire & Emergency Services
Provincial Building, 3 Cromer Avenue
Grand Falls-Windsor, NL
A2A 1W9
Phone - 709-292-4414
Fax - 709-292-4415

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Good morning, Linus.

I just wanted to quickly follow-up on a number of items that have been addressed since our last correspondence:

- All signage has been received on site and posted in the appropriate areas (e.g. Fire Door - Keep Closed, No Parking, No Smoking, Designated Smoking Area, etc.)
- Signs have also been posted adjacent to each dorm room window, illustrating the proper technique for fully opening the window in the event of emergency escape. The Camp Rules and Resident Orientation package has been updated to reflect this as well.
- A 3-year Service Agreement has been established with Tyco Integrated Fire and Security and the alarm system has since been inspected and fully serviced
- All smoke alarms have been inspected by Tyco and all deficiencies addressed
- All emergency and exit lights are now operational
- 3 x 32-foot fibreglass ladders are ordered with a 2-3 week ETA

Regarding our discussion on March 10th, I wanted to update that Emera NL is in full support of our suggestion to also supply emergency escape ladders for all second story dorms. This is in addition to the three exterior 32-foot emergency escape ladders that are on order (which would be used as a last resort). Regarding OH&S’s recommendation to provide some form of water suppression in the event that an asset is ablaze, it is ENL’s belief (which ECC fully supports) that the fire extinguishers on site currently provide adequate coverage. Please advise if your discussion(s) with [REDACTED] have identified any other possible courses of action for ENL to consider, otherwise we will proceed as planned.

The Emergency Response Plan has been revised accordingly, we are just currently waiting on closure of the above mentioned fire suppression situation before final approval and roll-out.

Please advise if you have any further comments or concerns... and thanks again for your support.

Best regards,

From: Tremblett, Linus
Sent: March-02-16 2:01 PM
To: [REDACTED]
Cc: [REDACTED]
Thank you for your quick response and attention to the Fire Protection issues associated with this matter. This certainly reflects the concern your company and those you engage in your operations has towards Fire Prevention and Life Safety.

I have attached your response to our file and look forward to future correspondence.

If there is anything further we can do during your occupancy and operations period at the site we are more than willing to assist.

Regards.

Linus Tremblett
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Good afternoon Linus.

Attached is East Coast Catering’s formal response to your Granite Canal Accommodations Facilities inspection report recommendations. I will continue to update you as each of the outstanding items are addressed. In the meantime, please do not hesitate to contact me directly if you have any questions or concerns.

Please feel free to distribute to any appropriate parties I may have excluded from this correspondence.

Best regards,
From: Tremblett, Linus [mailto:tremblett@gov.nl.ca]
Sent: February-18-16 10:25 AM
To: [redacted]
Cc: [redacted]
Subject: Inspection Report

Good Day Gentleman:
Sorry for the delay on this but attached you will find a copy of my report as discussed on site at Granite canal.
Please feel free to call at any time regarding Fire & Life safety issues.

Linus Tremblett
Fire Protection Officer I
Fire & Emergency Services
Provincial Building, 3 Cromer Avenue
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Welson

Per discussions of last week, I have attached a few of the E:mails which were previously forwarded by [REDACTED] of ECC on the work being done around fire safety items provided from Linus.

Additionally, a dedicated emergency transport vehicle with attendant has been established for the transmission line contractor working in the area between Granite Canal and Victoria Control Structure.

Powertel is the contractor working in the area and has included this service as part of their safety plan.

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Attachment Limits - Emera will not accept email larger than 20MB or emails containing high risk attachments like ZIP, EXE or others that could contain viruses. If you have a business need to send such an email, please contact the recipient for instructions.
Good Morning,

Thanks for the update. I look forward to receiving a copy of PowerTel’s ERP tomorrow. Can you also please provide an updated copy of East Coast Catering’s ERP by tomorrow as well?

Hopefully we will meet in person soon. Maybe when we get the latest ERP’s for the site we can arrange a site visit.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Welson:

I'm off on vacation returning tomorrow, however I spoke with Safety Manager with PowerTel, the contractor doing the work out of granite Canal, he will have copy of their ERP plan to me this afternoon, I will review and send it to you by tomorrow morning, that way I am sure it is in your hands.

It's too bad you couldn't attend the meeting in Corner Brook, I would like to spend some time with you, by the way did you get the ENL safety award item, if not I will bring one when we meet.

Have a great day!

Emera
902-625-1453

www.emera.com
From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: April-29-16 11:33 AM
To: 
Cc: Morgan, John; Martin, Denis
Subject: FW: Meeting with OH and S team - April 15, 2016

Good Afternoon

As requested in the email below (and through Inspection/Officer's Report 661686) please forward a copy of the revised emergency response plan. I have been directed by the Director of the OHS Division, Loyola Power, to obtain a copy of the revised emergency response plan for the Granite Canal site as soon as possible.

Please provide a response to this request as soon as possible.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: Roberts, Welson
Sent: Wednesday, April 27, 2016 11:01 AM
To: 
Cc: Tremblett, Linus; McCurdy, Darlene; Power, Loyola; Browne, Aiden; Carter, Doug; Martin, Denis
Subject: RE: Meeting with OH and S team - April 15, 2016

Good Morning

Thanks for the update. Order 661639 - 01 is closed since recommendations regarding the emergency response plan has been submitted to East Coast Catering by Fire and Emergency Services. In a letter dated Feb 18, 2016 sent to East Coast Catering by Fire Protection Officer Linus Tremblett, nine recommendations were outlined with respect to fire prevention and life safety.

I feel that it is important to note that these recommendations come from Fire and Emergency Services and not from the Occupational Health and Safety Division. In one of the attachments in your email (March 21, 2016 Email from [redacted] to Linus Tremblett) [redacted] states: "Regarding OH&S's recommendation to provide some form of water suppression in the event that an asset is ablaze, it is ENL's belief (which ECC fully supports) that the fire extinguishers on site currently provide adequate coverage." Recommendation # 7 from Mr. Tremblett's letter states: "Fire Suppression Equipment: Taking into consideration the fact that there will be no Fire Department response to this site, it is strongly recommended that fire protection equipment be placed at the site. (i.e. portable pumps/fire hose, appliances) in order
to provide emergency fire suppression and protection in case of fire involving infrastructure and or occupants at the site. Members of the ERT should have basic training in the use of the equipment and the equipment should be accessible at all times that the facility is occupied.”

I fully support recommendations made by Mr. Tremblett and the efforts made by Emera and East Coast Catering to improve health and safety at the Granite Canal site (including the provision of an emergency transport vehicle). Discussions around the recommendations are useful to improve health and safety and Fire and Emergency Services will make the decision as to whether they feel that their recommendations have been met. My concerns with the emergency response plan were outlined in follow-up Inspection Report 661686 and a copy of the revised Emergency Response Plan (to address concerns and recommendations) was requested at that time. I have not received a copy of the revised ERP and it is my understanding that work on revising the ERP is ongoing. The only other order I have outstanding at this time is 661639 – 03. The “To Wit” portion of the order states: “Following the review of Emergency Response Plan by Fire and Emergency Services, the employer shall ensure that all of its workers at this site are made aware of the plan and their role in it.” I have not received a copy of the revised ERP or confirmation that workers at the site have been made aware of the plan and their role. It is important to note that order 661639 – 03 currently has an extended compliance date which has expired and no further extension has been granted at this point.

Please provide an update as to the current status of the Emergency Response Plan.

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector  
Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
Fax: 709-292-4430

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From: [redacted]@emera.com  
Sent: Monday, April 18, 2016 4:58 PM  
To: Roberts, Welson  
Cc: [redacted]@emera.com  
Subject: Meeting with OH and S team - April 15, 2016

Welson

Per discussions of last week, I have attached a few of the Emails which were previously forwarded by [redacted] of ECC on the work being done around fire safety items provided from Linus.

Additionally, a dedicated emergency transport vehicle with attendant has been established for the transmission line contractor working in the area between Granite Canal and Victoria Control Structure.  
Powerel is the contractor working in the area and has included this service as part of their safety plan.

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Roberts, Welson

From: Roberts, Welson
Sent: Tuesday, May 03, 2016 8:29 AM
To: Morgan, John; Martin, Denis
Subject: FW: Meeting with OH and S team - April 15, 2016
Attachments: Emergency Response Plan D-000HS-0-700-00-021 Rev 3 DRAFT C.pdf
Importance: High

*Please note - this is the same version attached to the December 30, 2015 e-mail. As such the document has been provided elsewhere in this request.

FYI. Most up to date draft copy of ERP. Apparently new ERP will be available this week.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
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From: [Redacted]@eccltd.ca]
Sent: Monday, May 02, 2016 5:21 PM
To: [Redacted]; [Redacted]; [Redacted]; [Redacted]; [Redacted]; [Redacted]; [Redacted]
Cc: Tremblett, Linus; McCurdy, Darlene; Power, Loyola; Browne, Aiden; Carter, Doug; Martin, Denis;
Subject: RE: Meeting with OH and S team - April 15, 2016
Importance: High

Good afternoon, Welson...I hope all is well with you.

Regarding ECC’s Emergency Response Plan for Granite Canal (doc# D-000HS-0-700-00-021), attached is the most recent draft that was emailed to yourself and Linus Tremblett back on December 30th, 2015. You understood correctly in that draft “D” of this document is currently in the works however will be finalized this week. Myself and [Redacted] visited the site last week and held meetings with the ECC Chef Manager (“ERP Coordinator”) to discuss a number of improvement initiatives, including those that resulted from the last emergency evacuation drill conducted. During/since our visit, we have installed three 30-foot emergency ladders at designated locations on the exterior of the camp, and now have emergency escape ladders present in all second story dorm rooms. The process by which the muster lists are updated was discussed and adjusted to address after hours check-ins, which now needs to be reflected in the ERP. The only remaining outstanding item is to provide signage for the dorm cupboard doors, indicating that the emergency escape ladder is located inside. This will also be indicated in the newest revision of the Camp Rules (also currently being revised). Housekeepers will now be required to conduct an additional check during all check-out cleanings to ensure that the ladder is still present. Once the ERP has been finalized and approved, we will be holding a training session on site to ensure that all ERP Team members are aware of the changes and comfortable with their associated duties and responsibilities. This will be organized in such a way that all training is documented and acknowledged, with a drill being performed immediately afterwards to test competency.
As soon as the current draft of the ERP has been updated to reflect the above points (among other minor items) I will email you all a copy. In the meantime, if you have any questions or concerns, please do not hesitate to contact me directly.

Best regards,

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: April-27-16 11:04 AM
To: [redacted]
Cc: Tremblett, Linus; McCurdy, Darlene; Power, Loyola; Browne, Aiden; Carter, Doug; Martin, Denis
Subject: RE: Meeting with OH and S team - April 15, 2016

Good Morning

Thanks for the update. Order 661639 – 01 is closed since recommendations regarding the emergency response plan has been submitted to East Coast Catering by Fire and Emergency Services. In a letter dated Feb 18, 2016 sent to East Coast Catering by Fire Protection Officer Linus Tremblett, nine recommendations were outlined with respect to fire prevention and life safety.

I feel that it is important to note that these recommendations come from Fire and Emergency Services and not from the Occupational Health and Safety Division. In one of the attachments in your email (March 21, 2016 Email from [redacted] to Linus Tremblett) states: “Regarding OH&S’s recommendation to provide some form of water suppression in the event that an asset is ablaze, it is ENL’s belief (which ECC fully supports) that the fire extinguishers on site currently provide adequate coverage.” Recommendation # 7 from Mr. Tremblett’s letter states: “Fire Suppression Equipment: Taking into consideration the fact that there will be no Fire Department response to this site, it is strongly recommended that fire protection equipment be placed at the site. (i.e. portable pumps/fire hose, appliances) in order to provide emergency fire suppression and protection in case of fire involving infrastructure and or occupants at the site. Members of the ERT should have basic training in the use of the equipment and the equipment should be accessible at all times that the facility is occupied.”

I fully support recommendations made by Mr. Tremblett and the efforts made by Emera and East Coast Catering to improve health and safety at the Granite Canal site (including the provision of an emergency transport vehicle). Discussions around the recommendations are useful to improve health and safety and Fire and Emergency Services will make the decision as to whether they feel that their recommendations have been met. My concerns with the emergency response plan were outlined in follow-up Inspection Report 661686 and a copy of the revised Emergency Response Plan (to address concerns and recommendations) was requested at that time. I have not received a copy of the revised ERP and it is my understanding that work on revising the ERP is ongoing. The only other order I have outstanding at this time is 661639 – 03. The “To Wit” portion of the order states: “Following the review of Emergency Response Plan by Fire and Emergency Services, the employer shall ensure that all of its workers at this site are made aware of the plan and their role in it.” I have not received a copy of the revised ERP or confirmation that workers at the site have been made aware of the plan and their role. It is important to note that order 661639 – 03 currently has an extended compliance date which has expired and no further extension has been granted at this point.

Please provide an update as to the current status of the Emergency Response Plan.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
From: [Redacted]
Sent: Monday, April 18, 2016 4:58 PM
To: Roberts, Welon
Cc: [Redacted]
Subject: Meeting with OH and S team - April 15, 2016

Welson

Per discussions of last week, I have attached a few of the E:mails which were previously forwarded by [Redacted] of ECC on the work being done around fire safety items provided from Linus.

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Roberts, Welson

From:  Roberts, Welson
Sent:  Tuesday, May 03, 2016 11:33 AM
To:  Morgan, John
Subject:  RE: Meeting with OH and S team - April 15, 2016

John,

I believe that improvement initiatives as outlined in [redacted]'s email are not included in this version of the written plan but are being implemented at the site. The new plan coming this week will reflect these changes.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph:  709-292-4351
Fax:  709-292-4430

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From: Morgan, John
Sent: Tuesday, May 03, 2016 10:20 AM
To: Roberts, Welson
Subject: RE: Meeting with OH and S team - April 15, 2016

Hi:

Just to clarify is the one attached the one that is coming into effect this week?

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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From: Roberts, Welson  
Sent: Tuesday, May 03, 2016 8:29 AM  
To: Morgan, John; Martin, Denis  
Subject: FW: Meeting with OH and S team - April 15, 2016  
Importance: High

FYI. Most up to date draft copy of ERP. Apparently new ERP will be available this week.

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-292-4351  
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From: [redacted]@eccitd.ca  
Sent: Monday, May 02, 2016 5:21 PM  
To: Roberts, Welson; [redacted]@eccitd.ca  
Cc: Tremblett, Linus; McCurdy, Darlene; Power, Loyola; Browne, Aiden; Carter, Doug; Martin, Denis; [redacted]@eccitd.ca  
Subject: RE: Meeting with OH and S team - April 15, 2016  
Importance: High

Good afternoon, Welson...I hope all is well with you.

Regarding ECC’s *Emergency Response Plan* for Granite Canal (doc# D-000HS-0-700-00-021), attached is the most recent draft that was emailed to yourself and Linus Tremblett back on December 30th, 2015. You understood correctly in that draft “D” of this document is currently in the works however will be finalized this week. Myself and [redacted] visited the site last week and held meetings with the ECC Chef Manager (“ERP Coordinator”) to discuss a number of improvement initiatives, including those that resulted from the last emergency evacuation drill conducted. During/since our visit, we have installed three 30-foot emergency ladders at designated locations on the exterior of the camp, and now have emergency escape ladders present in all second storey dorm rooms. The process by which the muster lists are updated was discussed and adjusted to address after hours check-ins, which now needs to be reflected in the ERP. The only remaining outstanding item is to provide signage for the dorm cupboard doors, indicating that the emergency escape ladder is located inside. This will also be indicated in the newest revision of the Camp Rules (also currently being revised). Housekeepers will now be required to conduct an additional check during all check-out cleanings to ensure that the ladder is still present. Once the ERP has been finalized and approved, we will be holding a training session on site to ensure that all ERP Team members are aware of the changes and comfortable with their associated duties and responsibilities. This will be organized in such a way that all training is documented and acknowledged, with a drill being performed immediately afterwards to test competency.

As soon as the current draft of the ERP has been updated to reflect the above points (among other minor items) I will email you all a copy. In the meantime, if you have any questions or concerns, please do not hesitate to contact me directly.

Best regards,
From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: April-27-16 11:04 AM
To: 
Cc: Tremblett, Linus; McCurdy, Darlene; Power, Loyola; Browne, Aiden; Carter, Doug; Martin, Denis
Subject: RE: Meeting with OH and S team - April 15, 2016

Good Morning

Thanks for the update. Order 661639 – 01 is closed since recommendations regarding the emergency response plan has been submitted to East Coast Catering by Fire and Emergency Services. In a letter dated Feb 18, 2016 sent to East Coast Catering by Fire Protection Officer Linus Tremblett, nine recommendations were outlined with respect to fire prevention and life safety.

I feel that it is important to note that these recommendations come from Fire and Emergency Services and not from the Occupational Health and Safety Division. In one of the attachments in your email (March 21, 2016 Email from [Redacted] to Linus Tremblett) [Redacted] states: “Regarding OH&S’s recommendation to provide some form of water suppression in the event that an asset is ablaze, it is ENL’s belief (which ECC fully supports) that the fire extinguishers on site currently provide adequate coverage.” Recommendation # 7 from Mr. Tremblett’s letter states: “Fire Suppression Equipment: Taking into consideration the fact that there will be no Fire Department response to this site, it is strongly recommended that fire protection equipment be placed at the site. (i.e. portable pumps/fire hose, appliances) in order to provide emergency fire suppression and protection in case of fire involving infrastructure and or occupants at the site. Members of the ERT should have basic training in the use of the equipment and the equipment should be accessible at all times that the facility is occupied.”

I fully support recommendations made by Mr. Tremblett and the efforts made by Emera and East Coast Catering to improve health and safety at the Granite Canal site (including the provision of an emergency transport vehicle). Discussions around the recommendations are useful to improve health and safety and Fire and Emergency Services will make the decision as to whether they feel that their recommendations have been met. My concerns with the emergency response plan were outlined in follow-up Inspection Report 661686 and a copy of the revised Emergency Response Plan (to address concerns and recommendations) was requested at that time. I have not received a copy of the revised ERP and it is my understanding that work on revising the ERP is ongoing. The only other order I have outstanding at this time is 661639 – 03. The “To Wit” portion of the order states: “Following the review of Emergency Response Plan by Fire and Emergency Services, the employer shall ensure that all of its workers at this site are made aware of the plan and their role in it.” I have not received a copy of the revised ERP or confirmation that workers at the site have been made aware of the plan and their role. It is important to note that order 661639 – 03 currently has an extended compliance date which has expired and no further extension has been granted at this point.

Please provide an update as to the current status of the Emergency Response Plan.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [Redacted]@emera.com
Sent: Monday, April 18, 2016 4:58 PM
To: Roberts, Wilson
Cc: 
Subject: Meeting with OH and S team - April 15, 2016

Wilson

Per discussions of last week, I have attached a few of the Emails which were previously forwarded by someone at ECC on the work being done around fire safety items provided from Linus.

Additionally, a dedicated emergency transport vehicle with attendant has been established for the transmission line contractor working in the area between Granite Canal and Victoria Control Structure. Powertel is the contractor working in the area and has included this service as part of their safety plan.

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From: Roberts, Welson  
Sent: Tuesday, May 03, 2016 11:37 AM  
To: Morgan, John  
Cc: Martin, Denis; McCurdy, Darlene  
Subject: FW: Emergency Response Plan - Line Three Segment One  

FYI. Power Tel's ERP attached as requested. East Coast catering current plan already forwarded with the newest updated version of the plan expected this week. I am requesting a site visit so I will probably let him know that we will arrange this after we review the plan. What do you think?

Welson Roberts, CRSP  
Occupational Health and Safety Officer, Mining Sector Service NL  
C/O Provincial Building  
Grand Falls-Windsor, NL A2A 1W9  
Ph: 709-282-4351  
Fax: 709-282-4430

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From: [Redacted]@emera.com  
Sent: Tuesday, May 03, 2016 10:24 AM  
To: Roberts, Welson  
Cc: [Redacted]  
Subject: FW: Emergency Response Plan - Line Three Segment One

Welson;

I received the plan yesterday afternoon from PowerTel's Safety Manager for the workers on the project at Granite Canal, please have a look, look forward to your comments. [Redacted] tells me the access plan is too large to send (see email below), have to see about getting a hard copy, will make on for you also. I would like to have a visit with you to discuss the project, the setup of the contractors and what we are going to achieve with H&S on the project, I do not mind coming to Grand Falls, how does May 12th look for you, I could fly over on Wednesday evening and drive to Grand Falls for Thursday morning, we could meet and have lunch. A second option would be to go out to the camp on Thursday, stay overnight at the camp and come back on Friday, just a thought, just let me know.

Have a great day!

www.emera.com
From: [Redacted] @powertel.ca
Sent: May-02-16 1:06 PM
To: [Redacted]
Subject: Emergency Response Plan - Line Three Segment One

Good afternoon,

Please see attached.

Note: I am unable to send the access plan due to the file being too large. Please let me know if you got a drop box I can drop them in.

If you have any questions or concerns, please do not hesitate to contact me.

Regards,

[Redacted]

Maritime Link Project | POWERTEL UTILITIES CONTRACTORS LIMITED
300-1597 Bedford Hwy, Bedford, NS B4A 1E7 | www.powertel.ca

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If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Hello [Redacted]

I am contacting you as Welson is unable to this afternoon due to his performing field work.

Back on May 3rd you provided Welson with PowerTel’s ERP. I also understand that last week East Coast Catering was to implement a new draft of their ERP specific to the Granit Canal operation.

Could you please have forwarded to me, by close of day tomorrow if possible, the most up to date ERP document(s) that outline the response to medical emergencies, including multiple casualty incidents, at the Granit Canal site and immediately surrounding work sites? I understand that this will likely include related documents from several different employers.

Thank you,

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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Good Afternoon John,

As just discussed by phone, when you get back in the office and check your calendar can you please confirm that the date of October 12 is acceptable to visit Granite Canal. When you get back to me with confirmation I will contact [Redacted] with Emera to make the necessary arrangements.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Roberts, Welson

From: [redacted]@emera.com
Sent: Tuesday, October 11, 2016 11:26 AM
To: Morgan, John; Roberts, Welson
Cc: 
Subject: Granite Canal Visit - ROADS WASHED OUT

John / Welson;

With the weather event over the last 24 hours and still ongoing, we will need to reschedule the planned visit to Granite Canal tomorrow, the road to Granite has three sections that have washed out and the road between Badger and Miller town is washed out in two locations making road access impossible. ENL has shut down all work on the project at Granite Canal until the roads are open. I would suggest we reschedule the visit until next week as I believe the roads are not going to be passable until late this week. I have left messages with the Grand Falls Windsor Office and on Welson's cell.

Please give me a call when you get a chance.

Have a safe & productive day!

[Redacted]

www.emera.com

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Roberts, Welson

From: Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

Sent: Monday, November 07, 2016 10:47 AM
To: Morgan, John
Subject: FW: Emergency Response Plans for Granite Canal

Good to go tomorrow

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: Welson Roberts [mailto:welsonroberts@gov.nl.ca]
Sent: Monday, November 07, 2016 9:29 AM
To: Welson Roberts
Cc: Morgan, John
Subject: RE: Emergency Response Plans for Granite Canal

Welson;
We are good, meet you there!

From: Welson Roberts [mailto:welsonroberts@gov.nl.ca]
Sent: November 07-16 8:35 AM
To: Morgan, John
Cc: Welson Roberts
Subject: RE: Emergency Response Plans for Granite Canal

Good Morning

I just wanted to confirm that everything was a go for tomorrow morning. John and I are planning to meet in Badger at the Irving between 8:30 and 9:00 a.m.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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Page 19 Part Four
From: [redacted]@emera.com
Sent: Wednesday, October 26, 2016 10:31 AM
To: Roberts, Welson
Cc: [redacted]
Subject: RE: Emergency Resposne Plans for Granite Canal

Welson;
Excellent! Thank you

From: Roberts, Welson [mailto:welsonroberts@gov.nl.ca]
Sent: October-26-16 10:00 AM
To: [redacted]
Cc: [redacted]
Subject: RE: Emergency Resposne Plans for Granite Canal

Good Morning

Thanks for the update. I believe John has provided a response as to his review of the ERP’s but I wanted to let you know that in order to to beeter meet your needs we are planning to come to the site on the 8th of Nov. We will still meet in Badger between 8:30 and 9:00 a.m.

If you have any questions, please get in touch.

Welson Roberts, CRSP
Occupational Health and Safety Officer, Mining Sector
Service NL
C/O Provincial Building
Grand Falls-Windsor, NL A2A 1W9
Ph: 709-292-4351
Fax: 709-292-4430

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From: [redacted]@emera.com
Sent: Tuesday, October 25, 2016 10:41 AM
To: Roberts, Welson; Morgan, John
Cc: [redacted]
Subject: Emergency Resposne Plans for Granite Canal

Welson / John;

Please find attached ERPs for Granite Canal and the mutual aid agreement agreed to by all parties. We plan on closing the camp at end of year but most likely will go in to January 2017. We look forward to John and yourself visit. Were you able to change the date from November 09?
If you have any questions, please give me a call.

---

Emara  
F: 902-625-1453
Roberts, Welson

From: Morgan, John
Sent: Thursday, November 10, 2016 10:29 AM
To: Roberts, Welson
Cc: RE: Drill Exercises

Hi:

Thank you very much for these documents. It satisfies our need for this information and to ensure exercises such as this are performed.

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Compliance and Regulatory Affairs
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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From: [redacted]@emera.com
Sent: Thursday, November 10, 2016 10:20 AM
To: Morgan, John
Cc: Roberts, Welson
Subject: FW: Drill Exercises

John;
For inf.

Sent me the drills to date at Granite Canal.

From: [redacted]
Sent: November-09-16 2:46 PM
To: [redacted]
Subject: RE: Drill Exercises

Please see attached emergency drill documentation.

Can you please file these on the Z drive in preparation for our audit.

1
Thank you for your input yesterday, it was valued!
Can you send me all the emergency drills, table tops at Granite Canal fro all contractors, can you make this a priority?

Thanks

Emera

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Good afternoon John,

As a follow-up to yesterday's email, I have attached the draft of the ECC/AOMS *Multiple Casualty Incident Plan*, for your review. We have reviewed this internally, as has ENL, with all parties deeming it acceptable. Before I update our ERP to reflect this, I was really hoping to get your feedback.

Please feel free to call me at any time if you would like to discuss, as opposed to email.

Thanks again very much in advance,

---

Good afternoon John,

I just wanted to provide you with a quick update since my last email:

1. Order 0640937-01 – Had a meeting with AOMS senior management earlier today and an appending document to our Project ERP has since been drafted to assist site emergency response personnel during Multiple Casualty Incidents. This document has been developed in alignment with the Canadian Emergency Department Triage and Acuity Scale (CTAS) and, once it has been reviewed, finalized and approved by ECC and Emera NL, I will forward to you for your review.
2. Order 0640937-02 – The oxygen has been moved to the foot of the stretcher and again secured to the wall in an upright position 1.5M away from the electrical outlet and heating/cooling unit. A smoke detector was also installed in the nurse’s clinic today.

3. Orders 0640937-04, 05 & 06 – All PPE (surgical gowns, class 2 medical gloves and procedure masks w/ visor) has been ordered by AQMS through their supplier, with an ETA in St. John’s of Nov 18, which will then be shipped directly to site (~1-2 business days).

Regarding Order 0640937-02, we were wondering if you could point us in the direction of the applicable legislation and/or guidance documents regarding medical oxygen supply amounts and flow rates for multiple medical emergency and trauma scenarios, as we want to be absolutely certain that we are equipping the clinic with an adequate supply.

Thanks very much in advance for your support and assistance,

From: Morgan, John [mailto:jmorgan@gov.nl.ca]
Sent: November-15-16 11:41 AM
To: Roberts, Welson
Cc: ECC Granite Lake Manager
Subject: RE: Officers Report and Order Form specific to East Coast Catering

Thank you for your prompt response. Please keep me up to date as compliance is achieved so that I can promptly close the applicable orders.

In future I will use you as my main contact for ECC orders.

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Compliance and Regulatory Affairs
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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Subject: Officers Report and Order Form specific to East Coast Catering
Importance: High

Good morning Mr. Morgan,

Please see attached signed acknowledgements for receipt of the Inspection / Officers Report and Order Form 640937. Rest assured, we are currently working with our medical services subcontractor, AOMS, to address all recommended corrective actions.

Regarding Order 0640937-01, ECC's Project Specific Emergency Response Plan is currently being revised to cover response and management of Multiple Casualty Incidents, with training and functional exercises to follow upon completion.

Regarding Order 0640937-02, a smoke detector is being installed in the Nurse's clinic today.

Regarding Orders 0640937-03 through 06, I have a meeting scheduled today with AOMS to review all deficiencies and procure the necessary equipment/supplies for the clinic.

I will update you as we progress through addressing each order.

If you could please include me on all future correspondence pertaining to any orders/directives issued to East Coast Catering Firm # 614432 going forward, it would be greatly appreciated.

Thanks,
Potential copyright material

If you wish to obtain a copy please contact the ATIPP Office at (709) 729-7072 or atippoffice@gov.nl.ca.
Roberts, Welson

From: Morgan, John
Sent: Tuesday, November 22, 2016 10:08 AM
To: Roberts, Welson
Cc: 
Subject: RE: Officers Report for Granite Canal ETV
Attachments: Order Form 640938, HSE Integrated Ltd.pdf

Hi

Please accept my apologies for the delay in forwarding this order form to you which is associated with Officers Report 640938. Unfortunately other work commitments prevented me from preparing this order form prior to today. As with the report could you please sign this document in the appropriate area on the last page and then scan and e-mail the entire document back to me. You will note that the report mentioned eight orders being issued, but the order form only details seven. I combined the medical oxygen orders into one order on the order form.

John

John Morgan, B.Sc., B.A., SET
OHS Consultant
Compliance and Regulatory Affairs
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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From: Morgan, John
Sent: Tuesday, November 15, 2016 3:53 PM
To: Roberts, Welson
Cc: 
Subject: Officers Report for Granite Canal ETV

Hi

Please find attached a copy of the Officers Report being issued as a result of my inspection of your emergency transport vehicle stationed at Granite Canal site. The associated order form will follow by late tomorrow at the latest. Normally, both are issued together, but given how hard you are working on the issues identified I wanted to get the report to you asap to clarify the issues at hand.
Could you please sign page two of the report in the appropriate area and scan the entire report and e-mail it back to me?

Thanks

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Compliance and Regulatory Affairs
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

ORDER FORM

Toll Free: 1-800-563-5471

HSE INTEGRATED LIMITED
21 DUNDEE AVE
MOUNT PEARL
NL
A1N-4R6

Firm #: 700003
WCC #: 2035467
Tel: 709-739-6490
Fax: 709-368-6464

ORDER: 0640938- 01

ACT: Occupational Health and Safety

5 - a - Specific duties of employers

Without limiting the generality of section 4, an employer shall, where it is reasonably practicable, provide and maintain a workplace and the necessary equipment, systems and tools that are safe and without risk to the health of his or her workers;

TO WIT:

A detailed listing of safety engineered medical supplies readily available to, and used by, PCPs assigned to staff the Emergency Transport Vehicle while performing IM and Subq injections and IV therapy shall be provided to this Officer by the deadline noted.

This Order shall be carried out on or before: DEC 2, 2016

ORDER: 0640938- 02

REGULATION: Part VII - Personal Protective Equipment

78 - General requirements of limb and body prot

Where there is a danger of injury, contamination or infection to a worker's skin, hands, feet or body, the worker shall wear properly fitting protective equipment appropriate to the work being done and the hazards involved.

TO WIT:

The Emergency Transport Vehicle shall be provided with extended length medical gloves which have a class 2 medical device license issued by Health Canada and also meet ASTM D6978 standards.
An example of such gloves commonly used locally is Esteem XP gloves made by Cardinal Health.

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

ORDER FORM

Toll Free: 1-800-563-5471

These gloves shall be provided in appropriate sizes for the staff of this unit. These gloves shall be used for hazardous drugs protection and also when staff have to wear both gowns and gloves for droplet precautions.

This Order shall be carried out on or before: DEC 2, 2016

ORDER: 0640938-03

REGULATION: Part VII - Personal Protective Equipment
78 - General requirements of limb and body prot

Where there is a danger of injury, contamination or infection to a worker's skin, hands, feet or body, the worker shall wear properly fitting protective equipment appropriate to the work being done and the hazards involved.

TO WIT:

There were no medical gowns available that are appropriate for direct contact precautions and/or trauma care.

The Emergency Transport Vehicle shall be provided with a supply of disposable medical gowns documented as being impervious or nonpermeable. This is often documented by the gowns being described as having an AAMI rating of 4 per the ANSI/AAMI PB70 standard. The gowns supplied shall be appropriately sized for the staff of this unit. Alternatively gowns described as chemotherapy drug tested may be provided.

This Order shall be carried out on or before: DEC 2, 2016

ORDER: 0640938-04

REGULATION: Part VII - Personal Protective Equipment
78 - General requirements of limb and body prot

Where there is a danger of injury, contamination or infection to a worker's skin, hands, feet or body, the worker shall wear properly fitting protective equipment appropriate to the work being done and the hazards involved.

TO WIT:

The Emergency Transport Vehicle shall be provided with a supply of disposable surgical masks with attached visors. The surgical masks shall be described in manufacturer's documentation as being fluid proof or splash resistant.

This Order shall be carried out on or before: DEC 2, 2016

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR  
Service NL  
Occupational Health and Safety Inspections Branch

ORDER FORM

ORDER: 0640938- 05

ACT: Occupational Health and Safety
  5 - a -Specific duties of employers

Without limiting the generality of section 4, an employer shall, where it is reasonably practicable, provide and maintain a workplace and the necessary equipment, systems and tools that are safe and without risk to the health of his or her workers;

TO WIT:

At the time of inspection medical oxygen supplies carried by the Emergency Transport Vehicle consisted of two size E cylinders of medical oxygen. Given the remoteness of the site and emergency transport times under various scenarios this medical oxygen supply is inadequate. It was also identified that one of these cylinders was not properly secured.

Increased medical oxygen supplies shall be provided, and safely secured in the Emergency Transport Vehicle. One of these cylinders shall be carried in an oxygen therapy bag/kit which is secured while the vehicle is in motion and other medical oxygen cylinders carried shall be securing in device(s) designed and manufactured for vehicle/ambulance use. Consideration shall be paid to determining whether three size E cylinders of medical oxygen (two full and one in use) are adequate to being carried on this unit for casualty/patient care purposes.

This Order shall be carried out on or before: DEC 2, 2016

ORDER: 0640938- 06

ACT: Occupational Health and Safety
  5 - b -Specific duties of employers

Without limiting the generality of section 4, an employer shall, where it is reasonably practicable, provide the information, instruction, training and supervision and facilities that are necessary to ensure the health, safety and welfare of his or her workers;

TO WIT:

The undersigned shall be provided with a protocol outlining the actions workers are to take in the event of blood and bodily fluid exposures and/or injuries associated with exposure to used medical sharps including needles.

This Order shall be carried out on or before: DEC 2, 2016

A copy of this inspection/order report must be provided at the earliest possible opportunity to your OHS Committee, Worker Representative or Workplace Designate.
GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Service NL
Occupational Health and Safety Inspections Branch

ORDER FORM

ORDER: 0640938-07

REGULATION: Part VII - Personal Protective Equipment
74.2 General requirements of safety headgear

Safety headgear shall meet the requirements of CSA Standard CAN/CSA-Z94.1
"Industrial Protective Headwear" or, in the case of emergency response personnel,
the applicable National Fire Protection Association Standard.

TO WIT:

Proof shall be provided to the undersigned confirming that by the deadline noted the Emergency
Transport Vehicle has been provided with two NFPA 1551 or NFPA 1971 rescue helmets. These shall
be worn when ever safety headwear is needed by personnel providing emergency medical response
services.

This Order shall be carried out on or before: DEC 2, 2016

YOU ARE TO NOTIFY THE INSPECTOR INWRITING UPON COMPLIANCE.
FAILURE TO COMPLY WITH THE ABOVE ORDER(S) IS AN OFFENCE UNDER SECTION 67 OF
THE OCCUPATIONAL HEALTH AND SAFETY ACT, RSNL 1990, CHAPTER 0-3 AS AMENDED.

AN ORDER MADE BY AN OFFICER MAY BE APPEALED, IN WRITING, TO THE ASSISTANT
DEPUTY MINISTER WITHIN 7 DAYS OF THE ORDER.

Received By: [Signature]
Position: [Title]
Officer's Name: Morgan, John
Return Address: P.O. Box 8700
St. John’s, NL, A1B 4J6
Fax: (709) 729-3445
Date: NOV 22, 2016
Time: 9:57AM

A copy of this inspection/order report must be provided at the earliest possible opportunity
to your OHS Committee, Worker Representative or Workplace Designate.
From: [redacted]
Sent: Saturday, January 21, 2017 11:55 AM
To: Morgan, John
Cc: Roberts, Wilson
Subject: RE: Christmas Holidays in Granite Canal Camp

John

We are now beginning planning for late spring/summer work in Granite Canal. The scope of work will be very limited. It is envisioned that about 12 to 15 persons will be at the Granite Canal site performing primarily commissioning type activities and Powertel will be on site with a crew of up to 20 performing connections and transmission line rerouting local to the Granite site.

Given the reduced work force, one scenario is that the camp would be shut down (potentially removed from site) and folks would travel from local accommodations either at outfitters lodges or in the local communities nearby.

Powertel and ABB may be in Granite Canal together some times but likely independently at different times.

We are proposing that each contractor (ABB and Powertel) would have a class 4 driver with first aid, a paramedic, and a MTC. A mutual aid agreement would be in place when both contractors are on site. We can discuss any expectations beyond these. Please indicate potential timing for a discussion.

Hi,

I will be working outside the office starting shortly for the remainder of the week. I may be able to free up some time early next week.

What you propose sounds acceptable upon initial review. I would strongly recommend that you have a second person available who is also trained in first aid. That second first aider should be trained to at least the Emergency first aid and level A CPR training levels with the ERP updated appropriately.

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Compliance and Regulatory Affairs
Occupational Health & Safety Division
John

Per voicemail of last week, wanted to follow up with you on plans for Christmas at the Granite Canal Camp. Not sure if this better directed to you or Welson. Have copied Welson for now.

We are currently expecting all construction activities to halt in the Granite Canal Area between Dec 23 and Jan 2nd inclusive.

The current complement proposed for the camp would be 3 to 4 persons in an oversight capacity.

At a minimum we would expect the Camp Manager, Water Treatment person and one security person to be at the camp during the shutdown period.

This is a scenario not yet defined in our ERP.

Given that there is no construction activity planned we are proposing to allow the nurse to take the Holiday period off.

The Camp Manager has standard First Aid and we are looking at having a second person with First Aid if required.

The ERP evacuation plan would remain the same (Helicopter / Secondary transport vehicle) given that other contractors will not be working at site.

The road to the camp will be cleared during this period.

Can we set up a time to discuss requirements for this scenario?
Hi,

That Ferno device would be fine provided it is properly installed. Please note that in this province the norm is to install both the Ferno floor bracket shown as well as the Ferno wall bracket shown on the bottom left corner of the web page. It is normally considered necessary to ensure cylinders remain secure in the event of significant vehicle impact and/or rollover by installing both floor and wall brackets. The floor and wall brackets act together as a unit, but must be installed in strict compliance with the installation instructions.

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Compliance and Regulatory Affairs
Occupational Health & Safety Division
Service NL
Government Newfoundland and Labrador

t. 709-729-5769
c. 709-691-6388
f. 709-729-3445

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Hey John,

Could you let me know if this one would be sufficient?

Hi [redacted]

A little further information is needed for the purpose of my file regarding your operation at the Granite Canal site.

My records indicate that the ambulance subsequently received was not the one initially reported as being delivered to the province for use as an ambulance here. Hence I need to clarify what details pertain to the unit actually received and placed into operation.

Could you please confirm the name of the company that did the ambulance conversion work on the unit, what type of ambulance it is (Type I, II or III) as well as the model year and the current odometer reading on this ambulance?

Thanks,

John

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Hey John,

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Please see attached to confirm FERNO base mount and wall mount installation for MTC servicing granite canal as well.

Hi

Upon receipt of confirmation that the MTC referenced is currently assigned to, and servicing, the Granite Canal site/area, the orders specific to the gloves and gowns been closed.

John

Hey John,

Please see attached invoice indicating the cardinal gloves and gowns have been purchased and are now on the MTC. I’m in the process of trying to get the Ferno brackets flown in and installed for tomorrow or Monday.

Thanks,
From: Morgan, John [mailto:imorgan@gov.nl.ca]
Sent: Wednesday, January 25, 2017 10:10 AM
To: [Redacted]
Cc: [Redacted]; Roberts, Welson <welsonroberts@gov.nl.ca>
Subject: RE: Orders

Hi [Redacted]

Please confirm when the gloves and gowns are placed on the First Aid Vehicle serving Granite Canal and those orders will be closed.

Can you please send me the installation guide, or the link to the manufacturer's on-line document, that shows how the cylinder bracket pictured is to be installed? I also need pictures of this vehicle showing how all cylinders it carries are secured. I am asking as the last pictures, and prior ones, showed a cylinder securing device designed to be installed vertically on a wall installed horizontally on the floor.

Also, one of the pictures provided yesterday appeared to show a considerable amount of snow inside the vehicle on the floor. Can you please provide an explanation as to why so much snow was inside the casualty compartment of the vehicle? Was a door left open or is a seal badly damaged or missing?

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From: [Redacted]<ahseintegrated.com]
Sent: Tuesday, January 24, 2017 4:38 PM
To: Morgan, John
Cc: [Redacted]<emera.com>
Subject: Orders
Importance: High

Hey John,

Here is the specifications for the gloves and aprons
Gloves esteem XP cardinal:


Cardinal Smart gown Level AAMI Level 4


I couldn’t find the specifications on the other items so we just purchased these from cardinal health on clyde avenue. I will send invoice when our admin receives it.

I have also attached a picture of the correct bracket for the O2 cylinders.

Thanks,

HSE Integrated Ltd.
21 Dundee Ave
Mount Pearl, NewFoundland A1N 4R6

www.hseintegrated.com

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Hi,

Just go to the Transport Canada web site and type "Section 10.0 – Ambulance Vehicles" into their search engine.

If you have any trouble finding it please let me know.

John

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Hi John,

Thank you for the clarification. I will discuss with our fleet department and advise.

Mount Pearl

HSE Integrated Health, Safety and Environmet
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From: Morgan, John [mailto:jmorgan@gov.nl.ca]
Sent: Tuesday, February 7, 2017 3:35 PM
To: [Redacted]
Cc: [Redacted]; Roberts, Welson <welsonroberts@gov.nl.ca>; Martin, Denis <martind@gov.nl.ca>

Subject: RE: Orders

My initial recollection relates to a phone conversation regarding a unit that was being considered for delivery to this province. I indicated during that phone conversation that the unit in question would not be accepted for use here as the unit was not permissible for use, as an ambulance in Canada, per Transport Canada section 10 requirements. My recollection may well be inaccurate so I will ask for clarification specific to the documentation that was most recently provided to me specific to the ambulance unit being used by your company to service Granite Canal. That document is attached.

Questions:

1 - Is the attached document accurate for the vehicle that was delivered and is being used as an ambulance in this province?

2 - Was this unit built by GSA and sold by Wheeled Coach or was it built by Wheeled Coach?

3 - What type of ambulance is it? Reference in the documentation is made to it being a Type 4 ambulance. Both GSA and Wheeled Coach typically build Type I and III ambulances with Wheeled Coach also building Type IIs. When reference is made to a Type 4, in the context of a patient transport unit, it is normally being used to refer to UTV type patient transport units. I am fairly certain the unit in question is not a UTV based patient transport. Based upon the diagrams in the attachment it should be either a Type I or Type III.

4 - Please confirm the model year of this vehicle is 2008?

And

5 - Please confirm the current odometer reading on this unit and indicate if that reading is in miles or kilometers?

Thanks for your help.

John

John Morgan, B.Sc., B.B.A., SET
OHS Consultant
Good afternoon John,

I have returned from my vacation and will assist with your inquiries. Would you be so kind as to advise what records you have that indicated that the ambulance received is not what was initially reported? I am not aware of any change to the information I had already provided.

Mount Pearl

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Could you please confirm the name of the company that did the ambulance conversion work on the unit, what type of ambulance it is (Type I, II or III) as well as the model year and the current odometer reading on this ambulance?

Thanks,

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From: Morgan, John [mailto:jmorgan@gov.nl.ca]  
Sent: Thursday, January 26, 2017 6:37 PM  
To:  
Cc:  
Subject: RE: Orders

Hi  

Upon receipt of confirmation that the MTC referenced is currently assigned to, and servicing, the Granite Canal site/area, the orders specific to the gloves and gowns been closed.

John

From: Morgan, John [mailto:jmorgan@gov.nl.ca]  
Sent: Thursday, January 26, 2017 11:13 AM  
To: Morgan, John  
Cc:  
Subject: RE: Orders

Hey John,

Please see attached invoice indicating the cardinal gloves and gowns have been purchased and are now on the MTC. I’m in the process of trying to get the Ferno brackets flown in and installed for tomorrow or Monday.

Thanks,

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From: Morgan, John [mailto:jmorgan@gov.nl.ca]  
Sent: Wednesday, January 25, 2017 10:10 AM  
To:  
Cc:  
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Hi  

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showed a cylinder securing device designed to be installed vertically on a wall installed horizontally on the floor.

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Here is the specifications for the gloves and aprons

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Cardinal Smart gown Level AAMI Level 4


I couldn’t find the specifications on the other items so we just purchased these from cardinal health on clyde avenue. I will send invoice when our admin receives it.

I have also attached a picture of the correct bracket for the O2 cylinders.
Hi,

I thought a little further information/clarification would be helpful. GSA does not build ambulances; it does however act as a middle person to facilitate public sector organizations in the US when purchasing type I and III ambulances built to the KKK 1822 specs. So an ambulance originally purchased through GSA can come from a number of builders including Wheeled Coach.

John

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4 – Please confirm the model year of this vehicle is 2008?

And

5 – Please confirm the current odometer reading on this unit and indicate if that reading is in miles or kilometers?

Thanks for your help.

John

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From: Morgan, John [mailto:jmorgan@gov.nl.ca]
Sent: Tuesday, February 7, 2017 2:45 PM
To: 
Cc: 
Subject: RE: Orders
Importance: High

A little further information is needed for the purpose of my file regarding your operation at the Granite Canal site.

My records indicate that the ambulance subsequently received was not the one initially reported as being delivered to the province for use as an ambulance here. Hence I need to clarify what details pertain to the unit actually received and placed into operation.

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From: [redacted]  
Sent: Monday, January 30, 2017 4:08 PM  
To: Morcan, John  
Cc: [redacted]  
Subject: RE: Orders  
Importance: High

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From: Morgan, John  
Sent: Thursday, January 26, 2017 6:37 PM  
To: [redacted]  
Cc: [redacted]  
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From: Morgan, John [mailto:jmorgan@gov.nl.ca]
Sent: Wednesday, January 25, 2017 10:10 AM
To: [redacted]; [redacted]; [redacted]
Cc: [redacted]; [redacted]
Subject: RE: Orders

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I couldn’t find the specifications on the other items so we just purchased these from cardinal health on clyde avenue. I will send invoice when our admin receives it.

I have also attached a picture of the correct bracket for the O2 cylinders.

Thanks,

**HSE Integrated Ltd.**
21 Dundee Ave
Mount Pearl, Newfoundland A1N 4R6

[www.hseintegrated.com](http://www.hseintegrated.com)
It has been extremely busy of late, except for a couple of sick days and a storm day or two I have not had any holiday. My family is doing well, thank God and thank you for asking. I trust is the same for you and yours.

As to the documentation you have provided, I need some further information regarding it and its application. Those questions are listed below.

1. Is this document authorized and in effect?
2. Does is also apply to ECC, AOMS, ABB and Powertel?
3. Have ECC, AOMS, ABB and Powertel been oriented to this document and do they know they are expected to follow this guidance as well?
4. Does this integrate with, and in some cases replace, relevant sections of ECC, AOMS, ABB and Powertel emergency preparedness documents? AND
5. Has Central Health, Roberts Arm, Triton and Freakes ambulance services been informed of it as they could likely be requested to respond to a MCI involving multiple casualties?

As I am sure all involved parties can understand this order matter has been outstanding for quite some time and needs to be addressed ASAP to avoid an escalation of enforcement action.

John

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From: [Redacted]@emera.com
Sent: Friday, March 17, 2017 2:04 PM
To: Morgan, John
Cc: [Redacted]
Subject: Multi-Casualty Incident Response Plan - Granite Canal

John:
Hope everything is well with you, it has been a very busy couple of months. Did you get a few days off during March Break with the family?

HSE has prepared the Multiple Casualty Incident Response Plan for Granite Canal for ENL, trust this will close out any concerns. If you have any questions, please contact [HSE name] or myself.

Have a safe & productive day!

Emera
www.emera.com

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Confidentiality Notice - The email communication is considered confidential and is intended only for the recipient(s). If you received this email in error, please contact the sender and delete the email. Unauthorized disclosure or copying of this email is prohibited.

Attachment Limits - Emera will not accept email larger than 20MB or emails containing high risk attachments like ZIP, EXE or others that could contain viruses. If you have a business need to send such an email, please contact the recipient for instructions.
Hi [name],

It was a pleasure meeting and chatting with you and [name] yesterday.

I have closed order, 640937-01, at this time. This is based on what has been detailed below and what I have viewed in applicable documentation specific to AOMS, ECC, ABB, Powertel and HSE. It is also based upon your reporting that the applicable sections of those documents will remain in effect, supplemented with the new additions, as long as those documents remain relevant given the stage of site/area operations.

I have also noted, given your report of yesterday, that at this time Central Health officials have not identified any issues of concern during your recent discussions regarding multiple casualty incident response at this work site/area.

Regards,

John

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John;
Thank you for meeting with [name] and I today, we appreciate your advice on planned staged shutdown of the Granite Canal Camp.
I want to give you a status report on the Multi Casualty Plan for Granite Canal;

1. I have received confirmation from ABB, ECC and Power Tel of inclusion of the Multi Casualty Plan completed by HSE into their Emergency Response Plans.

2. I have personally spoke with Health Services with Central Health and confirmed response from her, these are the points she confirmed in an email to me.
   a) Granite Canal is part of their coverage area and will respond to a request in the event of an emergency event if requested.
   b) When calling in for a multi casualty event we can inform the dispatcher we need a “medical intercept” at store in Millertown and there will be an ambulance sent.
   c) This will potentially allow our ambulance to go back to the work site once the transfer is completed.
   d) Central Health have access to back up from Grand Falls in the event other calls are made to their coverage area.
   e) The telephone emergency number to be used is 1-709-672-2111.

3. As you commented, we agree we have voluntarily exceeded the minimum medical transport vehicle requirements by placing an ambulance at Granite Canal, as such, we recognize that the with the ambulance in place, we are obligated to comply with requirements for ambulance services and the ambulance will be the first vehicle used to transport injured parties, while it is at site.

I trust this meets all conditions in the order and request an email confirming compliance.
Have a safe & productive day!

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