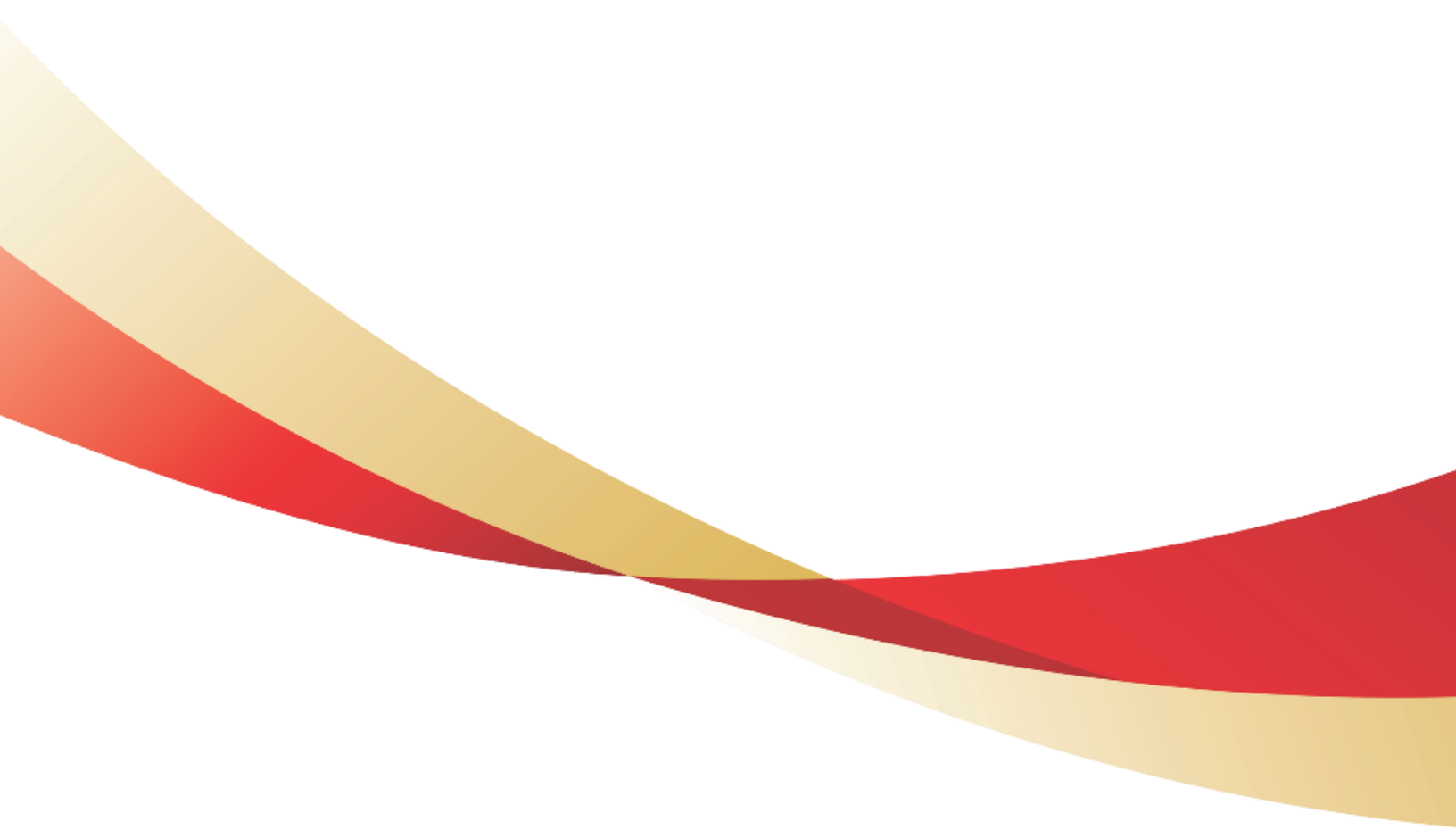


Appendix E

Integrated Contingency Plan: Emergency Preparedness and Response





INTEGRATED CONTINGENCY PLAN

EMERGENCY PREPAREDNESS AND RESPONSE



Plan updated Jan 1, 2017



Responsible Care®

Integrated Contingency Plan Emergency Preparedness and Response

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LIST OF ACRONYMS

AAR	Association of American Railroads
ACC	American Chemical Council
AEI	Automatic Equipment Identification
BOE	Bureau of Explosives (AAR)
CANUTEC	Canadian Transport Emergency Centre (Transport Canada)
CCOH&S	Canadian Centre for Occupational Health & Safety
CIAC	Chemical Industry Association of Canada
CEPA	Canadian Environmental Protection Act
CFR	Code of Federal Regulations (U.S.)
CHEMTREC	Chemical Transportation Emergency Centre
CNEA	Canadian Nuclear Energy Agency
CTEH	Centre for Toxicology and Environmental Health
DFO	Department of Fisheries and Oceans (Canada)
DECIDE	Detect/Estimate/Choose/Identify/Do/Evaluate
DIST	Emergency Response Process: Discovery/Initial Response/ Sustained Actions/Termination, Follow-up
DND	Department of National Defense (Canada)
DOD	Department of Defense (U.S.)
DOE	Department of Energy (U.S.)
DOT	Department of Transportation (U.S.)
EC	Environment Canada
EMP	Environmental Management Procedures
EMT	Emergency Medical Technician
EO	Environmental Officer
EPA	Environmental Protection Agency (U.S.)
ERAC	Emergency Response Assistance Canada
ERAP	Emergency Response Assistance Plan (Canada)
ERP	Emergency Response Plan
FRA	Federal Railroad Administration
FWS	U.S. Fish and Wildlife Service
HAZWOPER	Hazardous Waste Operations and Emergency Response (U.S.)

HMO	Hazardous Material Officer / HazMat Officer
HRSDC	Human Resources and Skills Development Canada
IC	Incident Command or Commander
ICP	Integrated Contingency Plan
ICS	Incident Command System
IDLH	Immediately Dangerous to Life or Health
MSDS/SDS	Material Safety Data Sheet / Safety Data Sheet
NFPA	National Fire Protection Association
NRC	National Response Center (U.S.)
NTSB	National Transportation Safety Board (U.S.)
OC	Operations Centre
OSHA	Occupational Safety and Health Administration (U.S.)
PIO	Public Information Officer
PCC	Police Communications Centre
PPE	Personal Protective Equipment
RAC	Railway Association of Canada
RTC	Rail Traffic Controller
SOP	Standard Operating Procedures
TC	Transport Canada
TC/TDG	Transport Canada / Transportation of Dangerous Goods
TSB	Transportation Safety Board (Canada)
UC	Unified Command

SECTION 1

INTRODUCTION

1.1 PURPOSE AND SCOPE OF PLAN

The purpose of this Emergency Response Plan is to explain the framework and procedures in place for CP's operations to safely and effectively respond to emergencies. ***An emergency consists of any accident, incident, or act of nature outside of regular CP operations.***

This plan is applicable to all operations involving CP property or employees system wide and covers accidents/incidents that may represent a potential hazard to people, property or the environment.

The Plan was developed to achieve the following objectives:

- to prevent injuries and save lives,
- to minimize property and environmental damage, and
- to ensure and provide for the continuity of business.

The Integrated Contingency Plan (ICP) will serve as the primary response tool. This plan is broadly constructed to allow for CP operations to address a wide range of risks in a manner tailored to the specific needs of their facilities and dangerous goods operations. This plan includes both physical and chemical hazards associated with events, including natural, technological and human-caused emergencies.

The annexes are designed to provide key supporting information for conducting an emergency response under the core plan as well as document compliance with regulatory requirements not addressed elsewhere in the ICP.

The ICP and annexes have been written to reflect CP's Health and Safety Culture and Operating Standards. These priorities and policies are outlined below:

Life safety is the highest priority of incident response followed by environmental and property protection and restoration. The following sections of the corporate health, safety and environment statements are especially applicable to incident response though the statements in their entirety apply to all CP operations.

- CP will integrate workplace, operational and public safety into incident response.
- CP will meet or exceed all applicable safety and environmental laws and regulations.
- CP will protect the health and welfare of its employees and other persons who may be affected by its operations and activities.
- CP will establish response objectives and develop site specific plans at incident sites to meet these goals.
- CP will keep employees and the public informed about its environmental plans through communications programs.
- CP will endeavor to protect property from damage arising from incidents along the rail. Where damage does occur, claims services will be made available to those impacted.

The ICP encompasses the pre-incident assessment and action plan development phase and will be used to develop specific incident plans as required.

1.2 DOCUMENT FORMAT

This document has been specifically organized in a modular format to ensure that new or updated information can be easily incorporated. As such, there are three primary sections that, together, comprise the ERP (the Plan):

1. Introduction
2. Core Plan
3. Annexes

The Introduction includes basic information that describes the purpose and scope of the Plan, documents the legal authority for the Plan, crosswalks the Plan's relationship to relevant Regulations, and documents how the Plan is amended.

The Core Plan describes the fundamental components of the emergency response process in the event of an accident/incident release and/or potential release, at any of CP's Operations.

The Annexes following the Core Plan provide additional information as referenced in other sections of the Plan.

1.3 APPLICABLE REGULATIONS

The ICP has been prepared in general accordance with the regulatory requirements for emergency planning as outlined in Exhibit 1:

Table 1. Regulatory Requirements

Regulatory body	Governing Legislation
Transport Canada (TC)	Transportation of Dangerous Goods Regulations Part 7 – Emergency Response Assistance Plan; Part 8 – Accidental Release and Imminent Accidental Release Report Requirements
Environment Canada (EC)	Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations (SOR/2008-197) Part 30 - Emergency Plan
Occupational Safety & Health Administration (OSHA)	29 CFR part 1910.120 Hazardous Waste Operations and Emergency Response (q) Emergency response program to hazardous substance releases <ul style="list-style-type: none"> • (q)(1) Emergency Response Plan • (q)(2) Elements of an Emergency Response Plan
Minnesota Pollution Control Agency (MPCA)	Minnesota Statute 115 E - Spill Bill requirements for railroad companies Environmental Protection - Chapter 115 - Section 115.061 <ul style="list-style-type: none"> • Duty to notify and avoid water pollution
Federal Railroad Administration	49 CFR Section 171.15 Immediate notice of certain hazardous materials incidents
US Environmental Protection Agency	40 CFR 68 Chemical Accident Prevention Provisions; 40 CFR 112 Oil Pollution Prevention Regulations; 40 CFR 300 National Oil and Hazardous Substance Pollution Contingency Plan
Transportation Safety Board (TSB)	Transportation Safety Board Regulations Part 1 Reports (5) Railway Occurrences

National Response Centre

At the earliest practicable moment, CP will notify the National Response Center after each incident that occurs during the course of transportation (including loading, unloading and temporary storage), as required by 49 CFR 171.15.

The NRC is responsible for contacting other Federal agencies.

For a full list of regulatory requirements and corresponding plan section, see Annex 11.

NOTE: Reporting will be completed in accordance with relevant Federal, Provincial and Municipal requirements. These and additional stakeholder reporting are outlined in Section 2.1.1.2

1.4 REVISION DATE & REVIEW PROCESS

This section provides the date that the plan was last revised to identify the currency of the plan. More detailed information on plan update history (i.e., a record of amendments) may be maintained in Annex 10 (Incident Debrief and Plan Review and Modification Process).

Current Version: Month/Day/Year
 Previous Revision Date: Month/Day/Year
 Upcoming Revision Date: Month/Day/Year

The ICP will be reviewed annually or when a substantial change occurs. The following operating condition changes would warrant the need for the implementation of the revision process:

- Product Change / Update
- Addition or Omission of Transportation Route

NOTE: The review process will ensure that the most accurate information is integrated into the plan. A record of revisions is kept. See Annex 12. for a full revision schedule and record.

1.5 ERP CUSTODIANS

System Safety and Emergency Response	System Environment
Assistant Vice-President Environmental Risk	Director Environmental Programs & Operations
Dangerous Goods	Field Safety & Systems
Director HazMat Programs	Assistant Vice-President Field Safety & Systems
CP Police	
Chief of Police	

In case of an Emergency contact the CP Police Communications Centre at: 1-800-716-9132
 General Inquires please call Community Connect at: 1-800-766-7912

1.6 FACILITY IDENTIFICATION INFORMATION

The facilities which have their own individual contingency plans are outlined in the table on the following page.

The Facility plans are located in Annex 4 of this plan.

1.7 PLAN STRUCTURE

This Integrated Contingency Plan has been organized into a modular framework. The plan structure ensures minimal duplication between emergency plans incorporating a combination of pre-existing CP emergency plan documentation and existing contingency plans into the modular format. The plan structure is interconnected through the following three primary sections:

1. Introduction
2. Core Plan
3. Annexes

The core plan contains an overview of Emergency Response Procedures and information that is consistent across CP operations in Canada and the United States. Specific geographic, regulatory or hazard information will now be found in the appropriate annex as outlined below:

Annex 1 ICS Structure and Implementation

Annex 2 Notification and Reporting

Annex 3 Contacts

Annex 4 Response Plans

Annex 5 Strategies and Tactics

Annex 6 Response Contractors

Annex 7 Forms and Field Guides (Incident Command Log Book)

Annex 8 Crossing Process

Annex 9 Training and Exercises

Annex 10 Incident Debrief and Plan Review and Modification Process

Annex 11 Regulatory Compliance and Cross Reference Matrices

Annex 12 Document Control

Annex 13 A Disciplined Approach

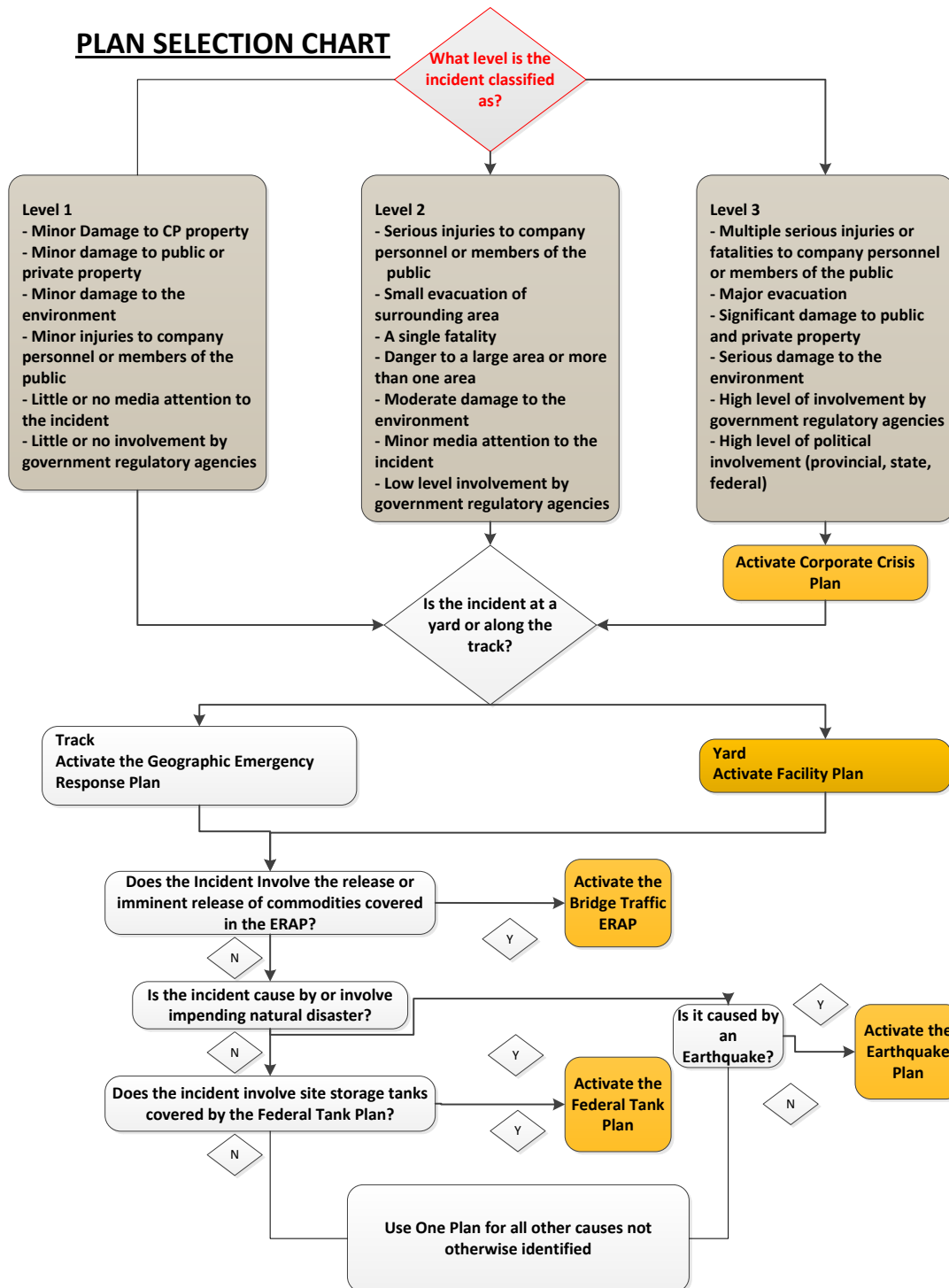
Annex 14 Derailment Scene Handbook

1.8 NATURE OF HAZARDS OR EVENTS APPLICABLE

The associated hazards to each event are identified as a road map mechanism to an existing supporting plan within CP Operations. For further information, consult the corresponding Annex 4.

Figure 1 below integrates the supporting plan selection with the above event type and associated hazard with incident classification levels.

Figure 1. Plan Selection



SECTION 2
CORE PLAN

The Core Plan describes the fundamental components of CP’s emergency response process. This section provides the critical information necessary to understand how CP’s Operations personnel respond to emergencies.

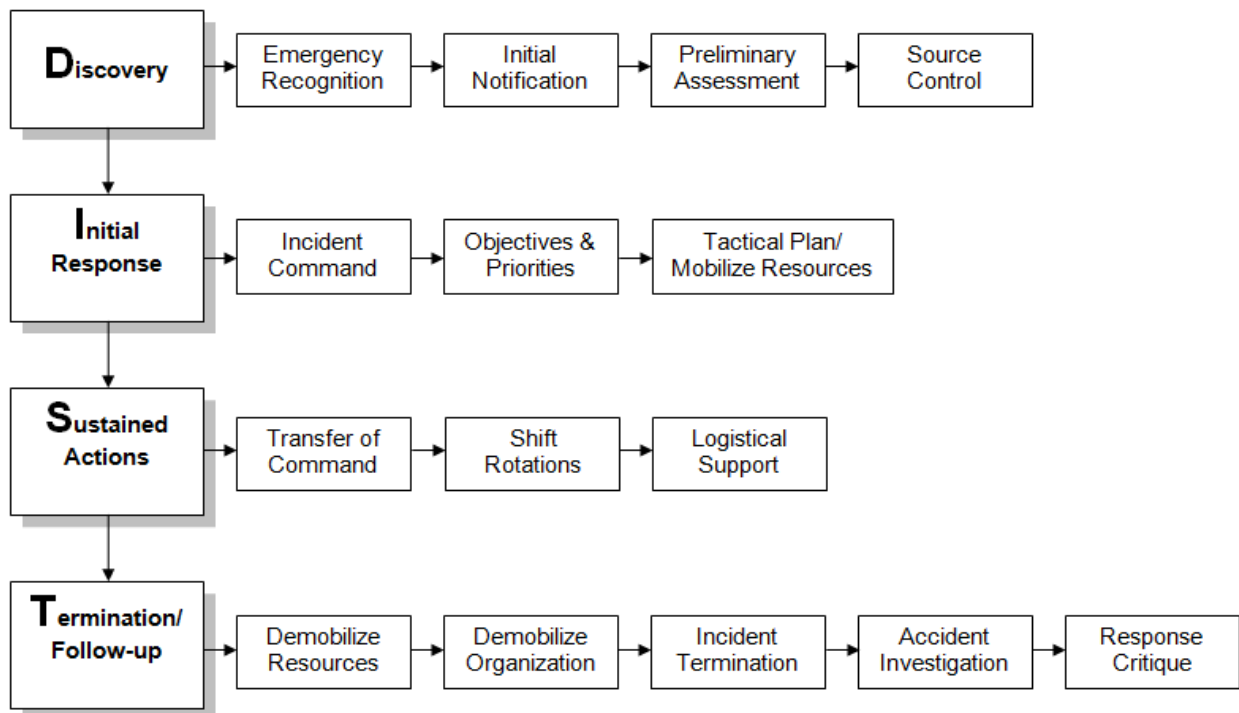
INITIATE EMERGENCY RESPONSE LOGBOOK IMMEDIATELY.

- This is essential in order to maintain an accurate event timeline, implement effective emergency response and protect CP’s interests. Refer to **Section 2.2.5**
- The Incident Command Logbook facilitates documentation during “operational periods” where sustained actions are required. Operational periods may be short in duration early in an incident (ex. 3 hours or 6 hours) but will likely lengthen as the incident progresses (ex. 12 hours). Refer to **Section 2.2.5**

Additional information and response tools (e.g., Field Guides) for several of the response actions identified in this section can be found in Annex 5. Figure 2 below depicts the basic activities and actions that are involved in the Emergency Response Process. The procedures associated with each activity or actions are elaborated further in this section.

D.I.S.T. is an acronym for CP’s incident response methodology used to manage incidents and associated operations. Section 2 of the ICP describes in further detail key elements including notification, command, objectives and priorities, shift rotations, logistical support and demobilization.

Figure 2. Emergency Response Process (D.I.S.T.)



2.1 DISCOVERY

This part describes the initial actions to be taken by the person(s) discovering an incident prior to the commencement of any initial response activities. Actions discussed in this section include emergency recognition, initial notification, preliminary assessment of the situation and source control.

IMPORTANT!

Report all emergencies involving CP trains or equipment, fires, spills, derailments, crossing accidents and all other emergency situations to:

CP POLICE COMMUNICATIONS CENTRE:

1-800-716-9132

&

your immediate supervisor

Once you have identified that a problem has occurred:

REMEMBER: S-I-N

SAFETY: Protect yourself

ISOLATE: Control access to protect employees and the public.

NOTIFY: Contact the CP Police Communications Centre and your supervisor.

Never rush in, or get in over your head.

2.1.1 Emergency Recognition “What Am I Faced With?”

Anyone on CP property who encounters an emergency should follow the following steps, as applicable:

1. Protect the movement of cars and immediately advise an immediate supervisor (i.e. Assistant Superintendent, Trainmaster, Yardmaster, etc...) if operating within yards or Rail Traffic Controller if operating outside of yards.

Note: When notified of a yard incident, **the immediate supervisor is responsible for immediately notifying the Rail Traffic Controller / Operations Centre.**

2. As required, communicate with the CP Police Communications Centre (1-800-716-9132). If deemed necessary, notify directly the municipal responders (Fire, Police, and Emergency Medical Services (EMS)) by calling 911. EMS and ambulance shall be notified when there are injuries or suspected injuries and the fire department shall be notified if there is a potential for, or an actual fire.
3. Keep clear of the incident scene and take immediate action to warn the public and other employees.
4. Avoid any exposure to smoke or fumes, and keep all open flames, including cigarettes, pipes, etc. away from the incident scene.
5. If the locomotive is not directly involved in the incident, cut the movement as close as safely possible to the incident location, and remove the remaining cars to a safe distance.
6. If a fire or vapour cloud is present and/or dangerous goods/hazardous materials are known to be involved, employees shall move to a safe distance up wind. Bring the shipping papers and emergency response information. Determine the status of the train from this point and advise the appropriate contact.
7. Reference Table 2 for the information to provide to the operations supervisor or RTC /Operations Centre, as soon as possible: For example:
 - Determine as quickly as possible the cars directly involved in the incident, as well as those in close proximity to them.
 - Before approaching the cars, identify the products involved by referencing any of the following:
 - Train consist/ journal (confirm accuracy with latest AEI reading and records of cars picked up/set off en route)
 - Shipping documents / Waybill
 - Switch lists and any other available documentation
 - Emergency response information: (Emergency Response Guidebook)
 - Determine which cars contain products that may pose a risk to employee / public health and safety or to the environment by providing:
 - Car numbers
 - Contents
 - Emergency response telephone numbers
 - Condition of the cars

Even if they are not involved in the incident, but are located near the cars involved, this information should also be obtained for cars containing products which may pose environmental, health or safety hazards.

In the event that such information is unavailable, contact the immediate supervisor or Rail Traffic Controller/Operations Centre for assistance in identifying the goods involved.

- Inform other crew members of products involved and any hazards that may be present.
- In all situations, cooperate with emergency response personnel. Provide information from the shipping papers. Make available emergency response information to arriving emergency response personnel. Retain possession of all original copies of the shipping papers and the train journal / consist until they can be delivered to the relieving company officer.
- The Public Information Officer (PIO) (Public Affairs & Communications) will be the point of contact for the media or other organizations seeking information directly from the incident or event. Consistent with CP's policy, it is important that CP personnel not volunteer information, make guesses or estimates, or offer opinions related to the incident unless authorized to do so by the PIO.

Table 2. Information to be provided by the first witness to the immediate supervisor (Yard) or Rail Traffic Controller (Main Track and All other Locations)

Name, title (call-back number) of the person making the report	
Nature and extent of any injuries.	
Exact location of incident (subdivision and mileage)	
Time incident occurred	
Numbers and types of the cars that are directly involved in the incident and those in close proximity to the incident	
Products contained in the cars directly involved in the incident and those in close proximity to the incident	
When a release or suspected release has occurred, the approximate rate of release and volume released	
Action taken (leaking car isolated, etc.)	
Status and condition of the cars directly involved in the incident and those in close proximity to the incident	
Prevailing weather conditions (rain, wind direction and speed, etc.)	
Surroundings, such as nearness to populated areas, terrain and local bodies of water, in order to gauge danger to persons and the environment	
Whether a water body, sewer system, culvert or other perceived sensitive receptor is or may be impacted by any release	
Resources necessary to handle the situation, such as fire, ambulance or law enforcement agencies	
Location where a member of the crew will meet arriving emergency response personnel	
Name of shipper and origin	
Name of consignee and destination	

2.1.1.1 Initial Notification “has the notification process been initiated?”

The incident notification process for CP is presented in Figure 3 below and explained on the following pages.

Figure 3. Incident Notification Process

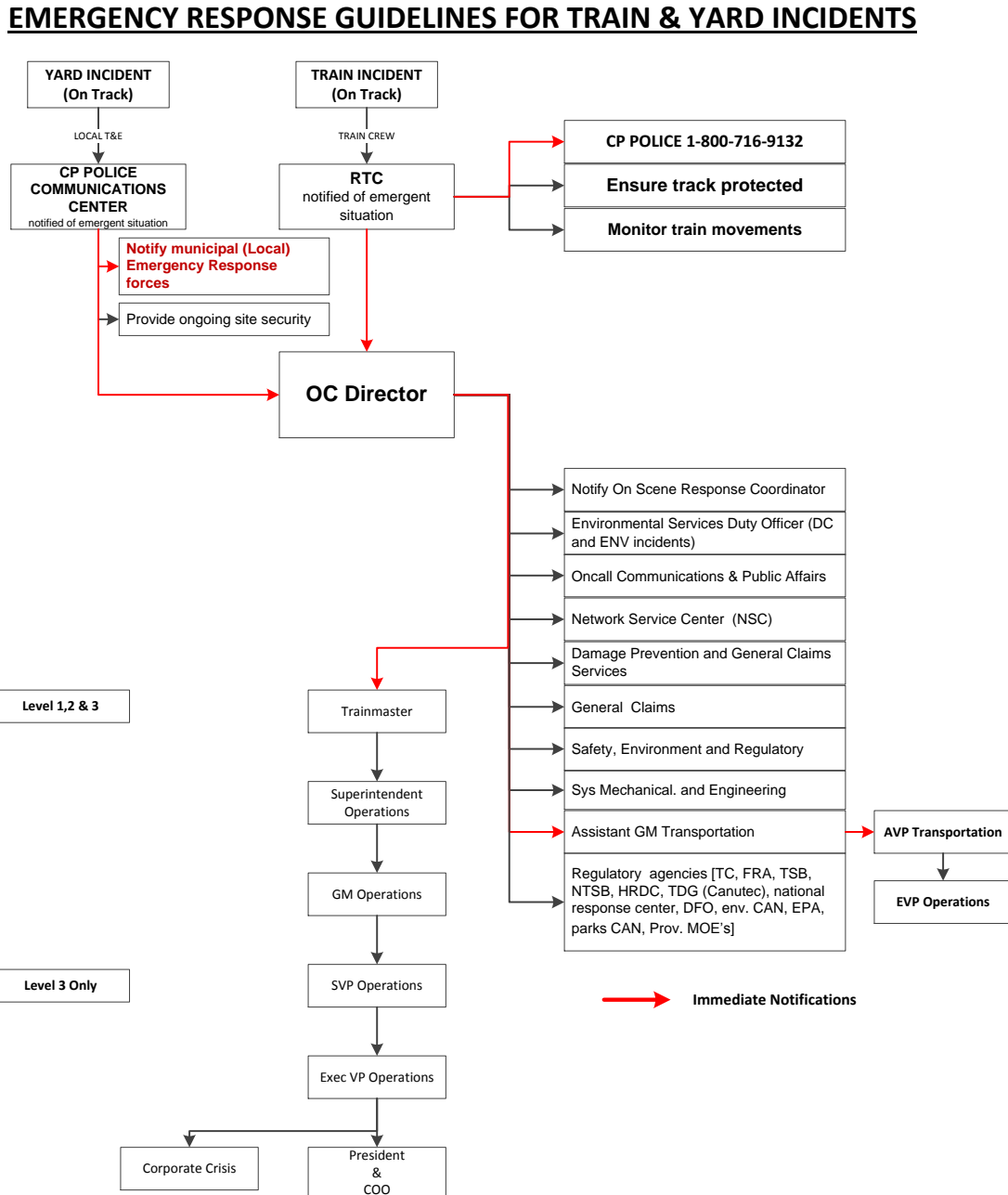


Figure 3 provides an overview of the incident notification process for a typical emergency involving dangerous goods / hazardous materials or any other product which may pose a risk to employees, responder and/or public health and safety, or the environment. This process can be divided into two components: (1) incident notifications required regardless of the incident conditions; and (2) incident notifications required only as conditions warrant. Each of these processes is described in further detail below. In addition, Annex 2 Notification and Reporting, provides detailed criteria and Annex 3 Contacts provides contact information for notification.

2.1.1.2 Required Incident Notifications

This section describes contacts that are required in the event of any incident regardless of size or magnitude including any emergency involving dangerous goods / hazardous materials or any other product which may pose a risk to employees, responder and/or public health and safety, or the environment.

First witness (Road vs. Yard Incident)

When a report of an incident or potential for an incident occurs in a CP yard, the first witness is responsible for immediately notifying their immediate Supervisor. When the incident occurs on main track or any other location, the first witness must immediately contact the Rail Traffic Controller / Operations Centre directly.

Immediate supervisor or senior CP Operations officer

The immediate supervisor or the senior CP operations officer or their designee will serve as the CP Incident Commander (described in more detail throughout the CORE PLAN (Section 2) Command may be transferred upward when a higher authority arrives on scene. The immediate supervisor is responsible for:

- Advising operations employees to warn all persons not to approach damaged or derailed cars until the hazardous properties of all materials have been identified and/or contained or the site has been declared safe;
- Instructing operations employees to remain at the scene, unless safety is threatened, with all documentation until relieved;
- Ensuring that the Rail Traffic controller has been notified without delay;
- Advising Senior Officers;
- As required, communicate with the CP Police Communications Centre (1-800-716-9132). As deemed necessary, the CP Police Communications Centre directly notifies municipal responders (Fire, Police, EMS).

Rail Traffic Controller

As depicted in Figure 3, when notified of an emergency regardless of magnitude, the Rail Traffic Controller is responsible for immediately advising the Operations Centre Director.

Operations Centre (OC) Director

The Director OC is responsible for contacting:

- a) Municipal ER Forces (if not already done by the CP Police Communications Centre)
- b) CP Police (if not already notified)
- c) Environmental On Call Duty Officer (EO or HMO)
- d) Mechanical & Engineering
- e) Senior Officers
- f) Regulatory Agencies such as:

i. Transport Canada (CANUTEC) / Transportation Safety Board (TSB)

CANUTEC is the Canadian Transport Emergency Centre operated by Transport Canada. CANUTEC provides advisory services and is staffed by professional chemists experienced and trained in interpreting technical information and providing emergency response advice. They also maintain the largest library of Material Safety Data Sheet (MSDS) information in Canada.

If the situation dictates, the OC may also be responsible for arranging prompt notification of additional government agencies, as described in more detail below.

All derailments, collisions, crossing accidents and releases of Dangerous Goods must also be reported to the Transportation Safety Board of Canada.

ii. Additional Government Agencies

In Canada, the OC is responsible for arranging prompt notification of additional government agencies, as the situation dictates, including:

- Canadian Nuclear Safety Commission
 - Provincial Environmental Agencies; and
 - Canadian Forces (Department of National Defense).
- g) On Call Public Affairs and Communications
 - h) Network Service Centre
 - i) Damage Prevention and General Claims

1. Senior Officers

In the event of an emergency (main track, yard, etc...) the Director OC will notify senior officers, or confirm that they have been notified.

The senior officers are composed of personnel from the Region, including:

- Sr. Vice-President Operations;
- General Manager;
- General Superintendent / Superintendent;
- Mechanical, Engineering, and Transportation Officers;
- Engineering Line Operations Officer.

All senior officers are called unless the Director /Operations Centre have been advised of an alternate person on call. Usually within an hour of the event, senior officers will conduct a preliminary assessment of the situation, including identifying the incident type, identifying the specific hazards involved, identifying the magnitude of the problem and identifying the populations or resources threatened.

Senior officers may delegate authority to the HazMat Officers (HMO) until any products posing a threat to employee, responder and/or public health and safety, or the environment are under control.

2. CP Police

In the event of an emergency, the CP Police Communication Center (PCC) is responsible for dispatching CP Police and making the initial notifications to the entities listed below as well to send out an internal alert email:

a) Municipal Responders

As conditions warrant, the CP Police Communications Centre will notify municipal responders (Fire, Police, and Ambulance) (Local 911). EMT and ambulance should be notified when there are injuries or suspected injuries and the fire department shall be notified if there is a potential for, or an actual fire.

b) Network Service Centre (NSC)

The NSC is responsible to efficiently deliver electronic copies of consists, waybills, MSDS, etc. to the OC, responders, HMO and other parties as required. The NSC is responsible for initiating the customer notification process following the incident.

The NSC is also responsible for coordinating the acquisition of rail cars for possible transload operations. After receiving initial notification of an incident, the NSC will obtain periodic status updates throughout the course of the incident.

c) Environmental On Call Duty Officer

Two members of the Environment and Hazardous Materials team will be assigned to the role of primary and secondary Environmental On Call duty officer for 24/7 coverage 365 days a year. The Environmental On-Call Duty Officer is notified by the Operations Centre for all incidents involving dangerous goods/hazardous materials or any other products posing a threat to employee, responder and/or public health and safety, or the environment. Such notification shall be made to the EO/HMO even when no release exists but a car / intermodal unit incurs damage that may result in a possible leak.

The Environmental On-Call Duty officer is responsible for providing guidance to the Operations Centre on reporting requirements when dangerous goods/hazardous materials or any other products posing a threat to employee, responder and/or public health and safety, or the environment. The Environmental On-Call Duty Officer is responsible for contacting the regional HMO and/or EO and provides assistance mobilizing emergency response contractors and resources to the incident scene.

d) Regional HazMat Officer (HMO) / Environmental Officer (EO)

The Regional HazMat Officer (HMO) / Environmental Officer (EO) are subject matter expert for on scene response operations. For emergencies involving dangerous goods/hazardous materials, the HMO or their designate shall immediately notify the shipper using the 24-hour emergency response number on the shipping document, whether or not emergency response is required and obtain a MSDS for the product involved. In addition the HMO shall contact the Emergency

Response Assistance Plan 24 hour number, if applicable, and advise the Plan holder of the incident and advise the expertise and resources en route to determine if additional resources are required. The HMO or their designate will keep the plan holder updated on the status of the incident as conditions change.

During incidents involving products which may pose environmental, health or safety hazards (that are not dangerous goods or hazardous materials), the Incident Commander or designate shall obtain the relevant MSDS from the NSC.

e) Risk Management / Risk Mitigation

CP Police Communications Centre shall notify Risk Management / Risk Mitigation / Claims to assist in areas such as:

- Significant derailments and injuries
- Evacuation
- Right of way fires

f) CP Public Affairs & Communications

Public Affairs will be notified by the CP Police Communications Centre for emergencies such as:

- Significant derailments and/or injuries
- Evacuation
- Incidents affecting the public or the environment; and/or
- Incidents that is likely to or has already come to the attention of the news media.

3. U.S. Only Notifications

For the U.S., the Minneapolis Operations Centre (MOC) shall make the following additional notifications when required:

a) National Response Centre

In the U.S., at the earliest practicable moment, the OC must notify the National Response Centre immediately after each incident that occurs during the course of transportation (including loading, unloading and temporary storage), as required by 49 CFR 171.15. The NRC is responsible for contacting other Federal agencies, including:

- The Environmental Protection Agency (EPA): Responsible for assuring environmental clean-up. The Agency must be notified of releases of reportable quantities;
- The Department of Transportation (DOT): Notified of all incidents that occur during the course of transportation (including loading, unloading and temporary storage);
- The U.S. Coast Guard (USCG): Primarily concerned with water pollution. The U.S. Coast Guard works closely with EPA, and may substitute for EPA where spills occur only in water and adjacent land;
- The Department of Energy (DOE): DOE is notified if the incident involves radioactive materials. DOE provides assistance in handling incidents involving radioactive materials.

In addition to DOE, State Radiation Control Programs can, in most situations, provide the most prompt radiological advice as well as assistance at the scene of an accident. They are also prepared to assess all types of radioactivity. In most states, the radiation control program has the responsibility for at least initial radiological assessment of a transportation accident. In general, vehicle operators should notify the state radiation control authority of any incident that delays their progress.

- The Nuclear Regulatory Commission (Nuc. Reg. Com);
- The National Transportation Safety Board (NTSB): Investigates serious or newsworthy accidents. The NRC will notify the NTSB if the incident meets the reporting requirements; and
- The Federal Railroad Administration (FRA) Investigates the incident if any of the following occurs involving a shipment of hazardous material:
 - A person is killed;
 - An injury involves hospitalization;
 - Estimated property damage exceeds \$50,000;
 - Fire, breakage, spillage, or suspected contamination involves radioactive materials or etiological agents; or
 - A situation exists of such nature that, in the judgment of the carrier, it should be reported.

b) State and Local Emergency Management Agencies

State and local emergency management agencies have reporting requirements that vary. Annex 1 provides a complete list of contact information and initial reporting requirements.

c) U.S. Fish and Wildlife Service

As conditions warrant, the Environmental Department shall contact the U.S. Fish and Wildlife Service (FWS) and the appropriate state departments of natural resources.

d) U.S. Department of Defense

The Department of Defense (DOD) is notified of incidents involving DOD escorted shipments (“White Train”). Incidents are reported to the Albuquerque Operations Office.

e) U.S. Department of Energy

The Department of Energy (DOE) is notified if the incident involves radioactive materials. DOE will provide assistance with communications and arrange for technical advice for emergency responders to a radioactive material transportation incident. DOE will, if requested, provide on-scene radiological assistance to support state and local responders through the regional coordinating offices of its Radiological Assistance Program.

Additional Assistance for Incidents Involving Radioactive Materials

In addition to DOE, State Radiation Control Programs can, in most situations, provide the most prompt radiological advice as well as assistance at the scene of an accident. They are also prepared to assess all types of radioactivity. In most states, the radiation control program has the responsibility for at least initial radiological assessment of a transportation accident. In general, vehicle operators should notify the state radiation control authority of any incident that delays their progress.

Section 2.1.1.2 provides an overview of the roles involved in the initial notification process for emergencies. Annex 2 and Annex 11 provides detailed criteria for regulatory and response notification, the requirements for providing follow-up documentation, and contact lists and telephone numbers for response and regulatory reporting.

System Protection contacts identifying responders geographically, including their respective contact information, are available in Annex 3 for the following:

- Risk Management
- Dangerous Goods
- Environment
- CP Police
- Public Affairs
- Risk Mitigation (U.S.)
- Damage Prevention

2.1.2 Preliminary Assessment “What Information Do I Need?”

This part describes the process of assessing the situation beyond the initial discovery, including an identification of the incident type, the specific hazards involved and the magnitude of the problem.

2.1.2.1 Identifying the Incident Magnitude

In order to allocate the appropriate response resources, the senior region officer will consider all the available incident information to determine the incident magnitude. For incidents involving products which may pose environmental, health or safety hazards, the senior region officer will consult with the HMO in order to properly understand the incident magnitude.

2.1.2.2 Identifying the Specific Hazards Involved

The IC and/or HMO and/or EO will seek input from all available resources in order to identify all of the products that may be involved in the incident. The products involved may be identified from information contained in the documentation listed below:

- Train journal / Consist
- Shipping documents / Waybill
- Switch lists and any other available documentation
- Emergency response information: (Emergency Response Guidebook)
- Contact appropriate resources to obtain critical information (SRS-HAZ, MSDS, CANUTEC/CHEMTREC, etc...)

Federal Regulations require that a shipping document accompany all shipments of dangerous goods/hazardous materials.

2.1.2.3 Identifying the Magnitude of the Problem

As soon as possible after the discovery of an incident an initial assessment is performed to determine the magnitude of the problem. The IC is responsible for assessing the magnitude of the incident in consultation with the HMO, the EO, and/or any qualified resource. The assessment includes, but is not limited to, the following:

- Identification of the nature, amount and location of released materials;
- Identification of materials involved in the incident, even if they are not released;
- Evaluation of the threat to human health;
- Determination of the probable direction and time of travel for released materials;
- Identification of possible exposure pathways for humans and the environment; and
- Identification of potential impacts on human health and safety, the environment, natural resources and property (see Regional Supplements).

2.1.2.4 Identifying Sensitive Receptors

Upon notification of an incident, the PCC will use all available information to quickly identify the location of any incident, the possible hazardous materials involved, the homes, farms, or other domiciles in the immediate area and details of the terrain. This information should be provided to the Senior Region Officer as well as onsite responders.

2.1.2.5 Safe Distances

The process described above will also be used to identify safe distances for all personnel that may be at the site of an incident that are not properly trained to respond to an incident involving hazardous materials. For initial Isolation and Protective action Distances consult the Emergency Response Guide Book.

2.1.3 Source Control “What Can I Do Now To Minimize The Outcome?”

When products involved may pose environmental, health, or safety hazards, extreme caution must be taken by all concerned. At no time shall operations resume until the area has been declared safe. In certain circumstances it is possible to take immediate actions safely to minimize the impact, including:

- Moving car(s) to an isolated track
- Confining release to CP property
- Isolate affected area by controlling access and activating notification process

2.2 INITIAL RESPONSE

Initial response will vary significantly depending on the magnitude of the incident. Most minor incidents will not necessitate the execution of all activities described in this part. The remediation of many incidents can be successfully handled with CP resources in a very short time. In these cases, the situation will be assessed by first responders in much the same manner as described in section 2.1.2, including identifying the incident type, the specific hazards involved, the magnitude of the problem and the populations or resources threatened.

2.2.1 Incident Command System – Establishing Organization Control

This part describes CP’s Incident Command System (ICS), which is a system for emergency response management and the Unified Command System, which brings together, as partners, all response organization at the scene of an incident to work cooperatively to resolve the incident.

2.2.2 CP's Incident Command System Organization

The ICS **facilitates** the rapid mobilization and effective use of resources needed to carry out and support emergency or non-emergency response operations. Although the ICS is highly structured, it provides for the flexibility of command needed to adjust to the dynamic nature of the incident. At the same time, the ICS maintains continuity of command throughout the conduct of response operations. For these reasons, the ICS is equally suited for small and large incidents.

Every emergency has major management actions or functions that must be performed. Even if the event is very small, and only one or two people are involved, these functions will still apply to some degree. The ICS divides an emergency response into five manageable functions that are essential for emergency response operations:

1. **Command (which includes the Incident Commander as well as his or her "Command Staff," as included in the positions of Safety, Information, and Liaison);**
2. **Operations;**
3. **Planning;**
4. **Logistics; and**
5. **Finance/Administration.**

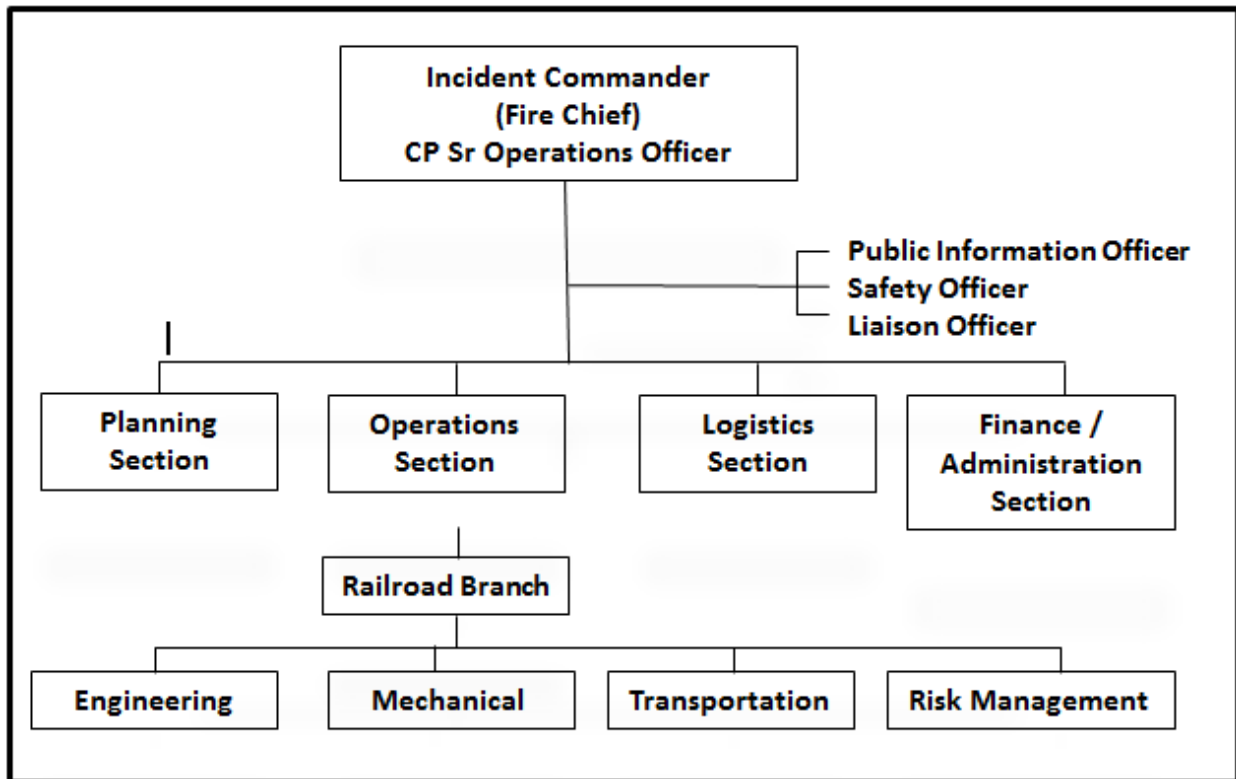
These five major management functions are the foundation upon which the ICS organization develops. They apply for handling a routine emergency, organizing for a major event, or managing a major response to a disaster. The ICS provides maximum flexibility to activate as many positions within the functional areas as are necessary to handle the magnitude of an incident.

On small incidents, one or all of the five major functions may be managed by the Incident Commander (IC). Large incidents usually require that each function be set up as a separate section within the system.

Figure 4 illustrates the ICS that would most likely be established in the event of a major incident. There is no one "best" way to organize, thus the organization should adapt to meet the needs of the incident. The characteristics of the incident and the management needs of the IC determine what organization elements should be established. If the incident is small, it may not be necessary. Conversely, if an incident begins to escalate, it may be beneficial to organize additional branches under the direction of the most appropriate function to address specific needs, as demands dictate. It is also important to recognize that, in the majority of incidents, several of the functions and activities may be performed by entities such as emergency response teams provided by the shipper / consignee, mutual aid assistance teams, or local/municipal response organizations. It is not expected that CP personnel will have to fill each position identified. It is the responsibility of the IC to coordinate the response effort and ensure that each necessary activity/function is being performed efficiently by someone involved in the response effort. Furthermore, the incident organization may change over time to reflect the various phases of the incident (more complex organization to handle more complex incidents).

Under an Incident Command system the Incident Commander is the Fire Chief or designate of the Authority Having Jurisdiction (AHJ). The senior CP operations officer or designate at the incident is the On Scene Response Coordinator (OSRC) for CP to interface with the AHJ Incident Commander through the Operations Section (Figure 4).

Figure 4. Incident Command System



2.2.3 Unified Command (UC) Organization

Incidents at a yard, along main track, or on other railway property may also have the potential for offsite consequences and various authorities may join the response effort. CP embraces the Unified Command (UC) concept where several response organizations are brought together as partners in the response effort, including provincial / state and regional response organizations, federal representatives, and the shipper / consignee and/or its mutual aid partners. UC provides guidelines for agencies with different legal, geographic and functional responsibilities to work together effectively. UC is a team effort that allows all agencies with responsibility for the incident, either jurisdictional or functional, to jointly provide direction to an incident through a common set of incident objectives and strategies. This is accomplished without losing or abdicating agency authority, responsibility or accountability.

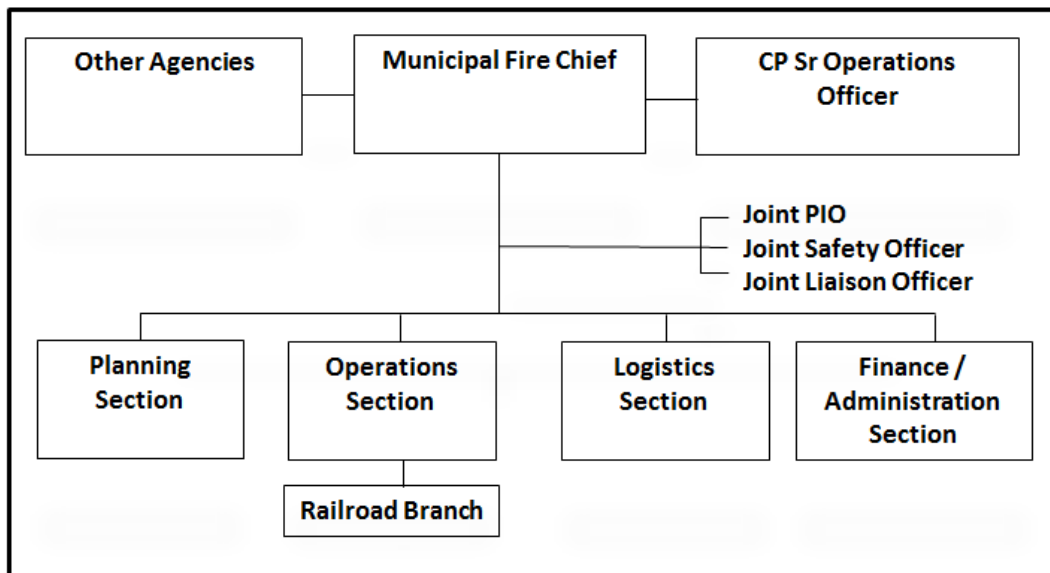
In the event of a major incident the UC would most likely consist of representatives from the shipper / consignee, the province / state, the city and/or federal representatives (Figure 5). Each of these representatives in the UC retains authority to control the resources it provides to the response effort. Provincial / state and federal legislation allow for an authority outside of the railway, such as a mayor, police chief, fire chief or federal representative to assume the role of the IC.

UC provides for shared involvement of the various responding organizations. It creates the link between the organizations responding to the incident and provides a forum for these agencies to make decisions. Under UC, the various jurisdictions and/or agencies are blended together throughout the ICS to create an integrated response team.

ICS/UC also ensures that information is shared both horizontally and vertically throughout the response organization, allowing the response to be conducted effectively. CP may also establish a Joint Information Centre, so the response effort is represented to the public by one unified voice.

Under a Unified Command System the senior operations officer or designee will operate in a unified command structure as the Railroad IC with the lead agency Incident Commander (Figure 5). Other Agencies may also be included in Unified Command which could include Provincial/State Authorities, Local Municipality, Shipper / Consignee of the product.

Figure 5. CP’s Incident Command System/Unified Command



2.2.4 National Incident Management System (NIMS)

For incidents in the U.S. on significant water bodies or of national significance, a State or Federal NIMS structure needs to be established.

2.2.5 Emergency Response Logbook

A CP emergency “Incident” is an event comprised of multiple phases:

1. The **Emergency Response Phase** consists of actions such as; initial response, fire suppression, containment and confinement, wrecking operations and stabilization.
2. The **Mitigation Phase** of an incident consists of actions such as; product transfers, cleaning, purging and scrapping of cars, infrastructure restoration and product recovery.
3. The **Remediation Phase** of an incident consists of actions such as; ground water monitoring, ground / water restoration, landscaping and environmental monitoring.

The purpose of the Incident Command Logbook is to provide the framework and necessary forms needed to assure command and control at an incident so all stakeholders are working effectively and efficiently to obtain unified goals and objectives in a safe and organized manner.

The Incident Command Logbook contains the forms most commonly used at an incident. Not all forms will need to be populated for all incidents. The forms needed at an incident are similar in concept to the incident command structure which can expand and contract based on size and complexity. *At some incidents mitigation and remediation are part of the initial response so incident duration does not warrant the use of operational periods. In these instances incident command logbook entries are limited or not required.*

At a minimum the Incident Command Logbook should be used at the following types of incidents:

- large and complex incidents where multiple CP functions require strict coordination
- where CP will interface with other first response agencies

Smaller, less complex incidents that exceed the first operational period should require completion of the ICS 201 Incident Objectives, 206 Medical Plan and 208 Site Safety Message.

The Incident Command Logbook facilitates and standardizes the documentation which is the responsibility of the Incident Commander (IC). The Incident Command Logbook is also designed to assist in the organization of activities, tracking actions taken throughout the emergency response and general record keeping.

The Incident Command Logbook facilitates documentation during “operational periods” where sustained actions are required and Incident Action Plans are carried out. An Incident Action Plan is submitted as the tactical objective by functions at the beginning of each operational period. Early in an incident the operational periods may be short in duration (ex. 3 to 6 hours) but will likely lengthen as the incident progresses (ex. 12 hours).

The IC may at any point designate a person responsible for the logbook entries and general documentation. When command is transferred, a briefing should take place and the logbook should be jointly reviewed to ensure operational goals and objectives are met.

2.2.6 Response Objectives and Priorities

This part identifies CP’s response priorities and describes the process for identifying incident objectives and strategies, and executing tactical direction.

2.2.6.1 Response Priorities

All CP employees must understand their role at an emergency is to work with all responding organizations to bring the incident to a safe conclusion. CP personnel will manage their own resources, while striving to interact and cooperate effectively with other responding entities through the principles of Incident Command System / Unified Command (ICS/UC).

CP response priorities are:

- immediate life safety;
- health of affected persons;
- protection of public, private property and the environment; and
- continuity of business.

2.2.6.2 Identifying Incident Objectives

Once an ICS has been established, the IC or UC is responsible for determining the incident objectives, strategy and tactical direction. Incident objectives are statements of intent related to the overall incident. For some kinds of incidents the time to achieve the objectives is critical. In others, time, while always important, may not be an overriding issue. All incident objectives must be measurable. In addition to the objectives outlined in Section 1.1, the following are further examples of incident objectives:

- stop the release of dangerous goods / hazardous materials;
- contain fire within existing structures;
- search affected area for injured persons or casualties;
- stop the flow of toxic or other materials to environmentally sensitive areas (example: lakes, rivers, sewers, etc...); or
- stop the release of any other product which may pose a risk to people, property, the public and/or the environment;
- contain and plan for remediation of any spilled product which may pose a risk to people, property, the public and/or the environment

2.2.6.3 Identifying Incident Strategies

The IC should develop appropriate strategies describing the methodology that will be used in achieving the incident objective.

2.2.6.4 Tactical Direction

Tactical direction describes what must be accomplished within the selected strategy or strategies in order to achieve the incident objectives. Tactical direction is the responsibility of the IC or the Operations Section Chief if that position has been established. Jointly developed tactics can assure understanding and enhance commitment. This is particularly important when the incident involves personnel from multiple disciplines.

2.2.6.5 Site Coordination / Communications

The Incident Commander must ensure that the Unified Command System maintains effective communications throughout the emergency response.

This will ensure that all responders involved in the emergency response have an opportunity to provide input into the response objectives and priorities, while remaining updated on the evolution of strategies and tactical activities. This approach will allow all responders to coordinate their respective activities safely and efficiently.

Effective communications need to be achieved through the unified command system and regular briefings with responders. Briefings must be held frequently at the onset of emergency response activities (ex: every 4 hours or as required by circumstances), and the time between briefings can be extended as emergency response activities stabilize and risks diminish.

For incidents involving the establishment of a command post by CP, or in conjunction with an outside agency, CP Police will control site security.

2.2.6.6 Additional Resources

Additional technical resources, including response equipment and specialized capabilities are referenced in Annex 6. These resources include the following.

2.2.6.6.1 Contract Responders

Local, state and federal regulations require that the Incident Command (IC) be the individual in charge of the incident. However, as it is CP's preference to have control over the hazardous materials operations, all private response contractors hired by CP work directly for CP. All tasks authorized or mandated by the IC must have the concurrence of the CP On-Scene Coordinator or HazMat Officer.

2.2.6.6.2 Air Monitoring Contract Responders

Air monitoring is used to quantify exposures to responders and the community. The results of air monitoring are critical in determining the required personal protective equipment for responders and evacuations and shelter in place needs in the community. Therefore, rapid mobilization of air monitoring assets are imperative.

2.2.6.6.3 Emergency Management Contractors

Emergency management contractors provide emergency management systems and resources. These systems and resources include:

- mobile command posts
- portable command posts
- communications
- generators
- crisis communication centre

2.2.6.7 Initiating Protective Actions

In the event of an emergency, protection of life and health is the first concern. When in doubt, the safest course of action must be taken. If an evacuation is required, CP has the decisional authority to evacuate personnel on CP property. CP may assist in simultaneously notifying nearby businesses and the community; however, it is the decision and responsibility of local authorities (e.g., police and fire departments) to initiate protective actions, such as evacuations, for the communities outside CP's operations.

2.2.7 Developing Tactical Plan and Mobilization

This part describes the process for initiating protective actions and conducting mitigating actions appropriate to the incident, including control and containment of a release.

Utilizing resources effectively minimizes exposure. Conversely, improper utilization of resources is very costly and can delay effective response.

The HMO or EO, working with the CP OSC (On Scene Coordinator) has the authority to direct company resources and CP contractors to provide reasonable assistance to abate the emergency. As resources become available, the HMO or EO will oversee the deployment of those resources to ensure the objectives of the plan are met. CP has primary responsibility for managing incidents involving its operations. The HMOs & EOs have training and experience to know their own capabilities and the capabilities of CP contractors and governmental agencies. The HMOs and EOs will have authority to marshal whatever resources are needed to mitigate the incident. CP will exercise prudence in utilizing

every available resource to mitigate an incident involving hazardous materials and assure that this is carried out in a safe and environmentally sound manner.

CP has established master service agreements with emergency response and environmental contractors who are capable of providing assistance at the incident site. Additionally, there are resources available from government agencies and associations that are useful in managing an emergency. CP also involves shippers, as primary contacts, when seeking technical information about a product.

2.2.7.1 Emergency Response Contractors

Emergency response contractors provide a number of different specialized services which can be used in mitigating and incident. These include but are not limited to the following:

- leak repair
- commodity transfers
- industrial fire fighting
- environmental cleanup and restoration
- Oil Spill Response Organization (OSRO)

2.2.7.2 CP Hazardous Material Emergency Response Team

Trained HazMat, Environmental and specific field operations, mechanical and police force members, located throughout the CP system, provide timely response to emergency situations. The HazMat Team is comprised of employees from various departments.

Each member of the team has completed 40 hours of initial training ICS 100 & 200 and meets the requirements necessary to assume the responsibility accorded to a railway incident.

All HMOs are capable of Level A site entry. Equipment for a Level A entry includes self-contained breathing apparatus, appropriate encapsulating suits, and hand and foot protection.

2.2.7.3 Heavy Equipment and Specialized Equipment

CP work crews have access to specialized equipment and operators capable of moving supplies into incident sites. Remote areas may require specialized rail-mounted equipment to bring supplies or personnel to the site. CP has access to response equipment, such as cranes, material trucks, loaders, backhoes and dump trucks. This equipment can be used to build containment areas and transport supplies. CP also has fire trailers that are equipped with foam, hose and pumps. Specialized mitigation equipment is also available, and is spread throughout the CP network. CP work crews, who are skilled in operation of the equipment listed above, may not be “40-hour” OSHA Trained, but can work at the site, as permitted by Section 1910.120(q) of 29 CFR. However, they are not expected to function as HazMat Officer, and must be given a safety briefing at the site, prior to their participation in any emergency response. The initial briefing includes the instruction of wearing appropriate personal protective equipment, what chemicals are involved and what duties are performed.

2.2.7.4 Municipal Responders

Typically, municipal emergency responders are used at the discretion of the Incident Commander. Their roles at the incident scene vary and may be used as entry, decontamination or rescue. Additionally,

municipalities have resources, such as sand and heavy equipment that can be used for damming and diking.

2.2.7.5 Government Resources

If government resources are needed at the incident scene, the request for those resources is made through the incident commander.

2.2.7.6 Site Safety Plan

A CP employee as designated by the Incident Commander will develop a Site Safety Plan. Although not specifically required under OSHA (29 CFR 1910.120(Q)), the Site Safety Plan outlines and documents the hazards and mitigations of hazards at the site.

2.2.8 Mitigating Action/Containment of the Release

Once personnel and population protective measures have been activated, CP personnel will take action to prevent, mitigate or minimize the threat. In determining the appropriate extent of action to be taken at a given release or spill, the preliminary assessment and current conditions must be evaluated. The following factors should be considered in determining the appropriate mitigating actions:

- Exposure to products which may pose environmental, health or safety hazards to nearby populations, animals or food chains;
- Contamination of drinking water supplies or sensitive ecosystems:
 - Pollutants or contaminants in storage containers that may pose a threat of release;
 - High levels of products which may pose environmental, health or safety hazards, or contaminants in soils, largely at or near the surface, that may spread;
 - Weather conditions that may facilitate the spread or release of substances;
 - Threat of fire or explosion;
 - The availability of other response mechanisms; and
- Should a determination be made that an action is necessary to contain the source of the release, or potential for a release, actions should be taken as soon as possible to prevent and minimize the threat to public health, welfare or the environment.

Table 3 identifies containment actions that are appropriate in the corresponding situations identified. Additional procedures for terrorist threats or incidents involving threats to security are referenced.

Table 3. Containment Actions

Situation	Potential Action
Where humans or animals have access to the release	Fences, warning signs, or other security or site control precautions
Where precipitation or runoff from other sources may enter the release area	Drainage controls

Where needed to maintain the integrity of the structures	Stabilization of berms, dikes or impoundments
Where needed to reduce the spread of dangerous goods/hazardous materials into soil, groundwater or air	Capping of contaminated soils or sludge
Where use of such chemicals will reduce the spread of release	Using chemicals or other materials to retard the spread of release or to mitigate its effects
Where removal will reduce the spread of contamination	Removal of contaminated soils from drainage or other areas
Where it will reduce the likelihood of spillage, leakage, exposure to humans, animals or food chain, or fire or explosion	Removal of bulk containers that hold dangerous goods/hazardous materials
Where it will reduce the likelihood of exposure of humans or animals to contaminated water	Provision of alternative water supply

2.3 SUSTAINED ACTIONS

This part describes the process of transition from the initial emergency stage to the sustained action stage involving more prolonged mitigation and recovery actions. This includes transferring command, shift rotations and obtaining logistical support.

Almost every emergency will require that activity transition from the initial emergency response stage to the sustained action stage involving more prolonged mitigation and recovery actions. When this occurs, it is often necessary to provide shift rotations to relieve first responders who may have been on-scene for several hours. One of the main features of ICS is the ability to transfer command and staff positions with minimum disruption.

2.3.1 Transfer of Command - “When and How Do I Transfer Command?”

Transfer of command may take place when a more senior person arrives at the scene and elects or has been designated by higher authority to assume the position of IC. This often occurs when an incident continues to escalate. Transfer of command can also take place in reverse (e.g., transferring command to a less senior or less experienced person in an incident that is under control or moving toward demobilization). In addition, transfers may also be needed for personnel assigned to assume command or staff positions for continued operations. The decision to transfer command is based on complexity of the incident, qualifications and experience. Prior to every command transfer, the current IC should ensure that:

- An Incident Command Post has been established;
- Transfer of command will take place face-to-face, if possible;
- A briefing or status report is provided to the incoming commander; and
- Appropriate notifications are made to incident personnel and appropriate non-incident locations.

2.3.2 Shift Rotations – “Brief Personnel!”

Face-to-face briefings between outgoing and incoming personnel should be performed to cover relevant issues such as:

- the situation status
- objectives and priorities
- the current organization
- resource assignments
- resources enroute and/or ordered
- facilities established
- Communications Plan
- prognosis, concerns, related issues

2.3.3 Logistical Support

In the event that a response extends for several days, the Logistics Section of the ICS becomes increasingly important in meeting the demands of personnel and resources directly assigned to the incident. In a large scale incident, the Service and Support Units of the Logistics function will be

responsible for ensuring that all responders are provided with sufficient resources (food, water, sleeping areas, medical, transportation services, etc...)

2.4 TERMINATION AND FOLLOW-UP ACTIONS

This subsection describes the process for concluding a response, including demobilizing response resources, demobilizing organizational elements and incident termination, including follow-up actions such as accident investigation and response critique.

2.4.1 Demobilization of Resources

At all times during an incident, and especially at the conclusion of response activities, the IC and staff members must determine when assigned resources are no longer required to meet incident objectives. Excess resources must be released in a timely manner to reduce incident-related costs, and to “free up” resources for other assignments.

During larger incidents, especially those that may have personnel and tactical resources from several organizations or jurisdictions, it is important for the IC to coordinate the development and the communication of a detailed demobilization plan to all stakeholders in order to release resources expediently and effectively.

Demobilization of key resources (wrecking services, ER contractors, etc...) shall be recorded in the Emergency Response Logbook.

2.4.2 Demobilization of Organizational Elements

As the response nears conclusion, it is appropriate to demobilize units, branches and sections as conditions warrant. Anytime a unit, branch or section is demobilized, the function it was performing goes to the next higher level in the chain of command. This process must be communicated to all stakeholders.

2.4.3 Incident Termination

After consultation with each of the Section Chiefs, the IC will determine that the incident objectives have been met and response operations can be terminated. After further consultation with the Operations Section, including the Railroad branch (mechanical, engineering, and operations units, the IC will declare that the area is safe and business operations may resume at their normal capacity. Even after the response has been terminated and the ICS has been deactivated, it is possible that some members of various functions, such as the Environmental Protection Unit or Mechanical Unit, may require further participation (either on-site or off-site) to conclude the incident response, such as overseeing clean up and remediation efforts.

2.4.4 Accident Investigation

All incidents shall be investigated to determine the root cause and contributing factors. The Operations, Mechanical and Engineering Officers will conduct the investigation. CP's Derailment Scene Hand book provides guidance in determining the primary causes and contributing factors of incidents/failures and is included in CP's Emergency Response Incident Command Logbook (Annex 7).

2.4.5 Response Critique

When deemed appropriate by senior company officers an internal response debrief will be carried out. The debrief is intended to identify lessons learned to improve the response to future incidents. The debrief could include a discussion of the incident, the factors involved, the dangerous goods/hazardous materials involved, the response actions taken, whether the existing procedures and resources functioned as expected; improvements to procedures and resources, and needs for additional training, equipment and communications. A response critique with external parties such as the local fire department may also be carried out.

Each region is responsible to maintain oversight on the response debrief process and form.

2.4.6 Public and Media Relations

When an incident results in off-site impacts, it may be necessary to enact follow up public relations. The priority is to demonstrate to the public that CP is concerned for the safety of its neighbours.

These activities may include:

- Visits to neighbours to check for issues and concerns
- Meetings and follow-up with media to inform the public about the causes of the incident and what the company is doing to prevent recurrence
- Social media
- Creation of website

The key objective to managing the spread of information throughout an incident is to establish trust between CP and the public and to provide neighbouring residents with enough information to feel safe.

2.4.7 Employee Assistance / Critical Incident Response Program

Employees affected by the incident may experience delayed / long term reactions.

Critical Incident Response Program for CP employees can be obtained through:

- The Employee and Family Assistance Program Referral Agent at 1-800-735-0286 in Canada.
- The Administrator of the Employee Assistance Program at 1-800-432-5155 in the United States.

2.4.8 Legal Services / General Claims

Many legal issues may arise out of an incident. Legal Services is to be contacted for all litigation, contractual and regulatory issues including recovery of expenses from shippers where appropriate.

2.4.9 Insurance

CP has a comprehensive insurance program in place to reduce the overall financial impact of a major incident. While the terms and conditions of these policies do not hinder immediate response activities, it is necessary for reporting requirements that the Risk Management Department is **immediately** aware of incidents involving:

- Multiple or serious injuries (including, but not limited to, death) to 3rd Parties and/or CP Employees

- Significant Property damage to CP property Loss involving pollutants as a result of collision, overturning or derailment, fire, lightning or explosion
- Loss involving Dangerous Goods/TIH/PIH as a result of collision, overturning or derailment, fire, lightning or explosion
- Any other significant 3rd party property damage or bodily injury liability claim Any situation which may lead to a suit/class action suit against the Company, an employee or any member of the Board of Directors
- Any incident involving the CP corporate jet that results in a claim to CP property or brought forward by 3rd parties
- Any threats or actions undertaken by terrorist organizations
- Any claim brought against the company relating to breach of fiduciary duty with regards to the Canadian Pacific company pension plan, investments, savings, profit-sharing, share ownership, employee benefits
- Financial loss as a result of employee fraud or dishonesty

The major reporting condition of the insurance policies is that CP advises the insurance company within 120 hours (5 days) of the incident if the total cost exceeds one-half of the deductible.

2.4.10 Property Restoration

Damage caused by the incident will be repaired and the site restored as much as possible to pre-emergency conditions. In incidents where property damage is significant CP claims services will be activated.

SECTION 3

ANNEXES

- Annex 1** ICS Structure and Implementation
- Annex 2** Notification and Reporting
- Annex 3** Contacts
- Annex 4** Response Plans
- Annex 5** Strategies and Tactics
- Annex 6** Response Contractors
- Annex 7** Forms and Field Guides (Incident Command Log Book)
- Annex 8** Border Crossing Process
- Annex 9** Training and Exercises
- Annex 10** Incident Debrief and Plan Review and Modification Process
- Annex 11** Regulatory Compliance and Cross Reference Matrices
- Annex 12** Document Control
- Annex 13** A Disciplined Approach
- Annex 14** Derailment Scene Handbook