



INTEGRATED CONTINGENCY PLAN

EMERGENCY PREPAREDNESS AND RESPONSE



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Integrated Contingency Plan Emergency Preparedness and Response

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LIST OF ACRONYMS

AAR	Association of American Railroads
ACC	American Chemical Council
ACP	Area Contingency Plan
AEI	Automatic Equipment Identification
B.C.	British Columbia
BCMoe	British Columbia Ministry of Environment and Climate Change Strategy
B.C. C-Plan	British Columbia Spill Contingency Plan
BOE	Bureau of Explosives
BIA	Bureau of Indian Affairs (U.S.)
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
COC	Calgary Operations Centre
COSRP	Comprehensive Oil Spill Response Plan
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/
DND	Department of National Defense (Canada)
DOD	Department of Defense (U.S.)
DOE	Department of Energy (U.S.)
DOI	Department of Interior (U.S.)
DOT	Department of Transportation (U.S.)
EC	Environment Canada
EMP	Environmental Management Procédures

EMS	Emergency Medical Services
EMT	Emergency Medical Technician
EO	Environmental Officer
EPA	Environmental Protection Agency (U.S.)
ER	Emergency Response
ERAC	Emergency Response Assistance Canada
ERAP	Emergency Response Assistance Plan (Canada)
ERO	Emergency Response Organization
FOSC	Federal On-Scene Coordinator
FRA	Federal Railroad Administration
FWS	Fish and Wildlife Service (U.S)
HAZWOPER	Hazardous Waste Operations and Emergency Response (U.S.)
HMERO	Hazardous Materials and Emergency Response Officer
HRSDC	Human Resources and Skills Development Canada
IC	Incident Command or Commander
ICP	Integrated Contingency Plan
ICS	Incident Command System
ICS/UC	Incident Command System / Unified Command
IMT	Incident Management Team
IDLH	Immediately Dangerous to Life or Health
LOSC	Local On-Scene Coordinator
MOC	Minneapolis Operations Centre
MSDS/SDS	Material Safety Data Sheet / Safety Data Sheet
NCP	National Contingency Plan (U.S.)
NFPA	National Fire Protection Association
NIMS	National Incident Management System
NRC	National Response Center (U.S.)
NTSB	National Transportation Safety Board (U.S.)
OSHA	Occupational Safety and Health Administration (U.S.)
OSRO	Oil Spill Removal Organization
OSRP	Oil Spill Response Plan

PHMSA	Pipeline and Hazardous Materials Safety Administration (U.S.)
PIO	Public Information Officer
PCC	Police Communications Centre
PPE	Personal Protective Equipment
RAC	Railway Association of Canada
RTC	Rail Traffic Controller
RO	Response Organization
RZA	Response Zone Appendix
SOP	Standard Operating Procedures
SOSC	State On-Scene Coordinator
TC	Transport Canada
TC/TDG	Transport Canada / Transportation of Dangerous Goods
TSB	Transportation Safety Board (Canada)
UC	Unified Command
UCS	Unified Command System
U.S.	United States

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SECTION 1

INTRODUCTION

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1.1 PURPOSE AND SCOPE OF THE ICP

The purpose of this Integrated Contingency Plan (ICP) is to explain the framework and procedures in place for Canadian Pacific Railway's (CP) operations to safely and effectively respond to emergencies. ***An emergency consists of any accident, incident, or act of nature outside of regular CP operations.***

The ICP 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 ICP 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 ICP will serve as the primary response tool. This ICP 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 ICP includes both physical and chemical hazards associated with events, including natural, technological and human-caused emergencies.

The ICP 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. Additional Health and Safety information is included in Section 2.1.2.6.

1.1.1 Integration of ICP into other Response Plans

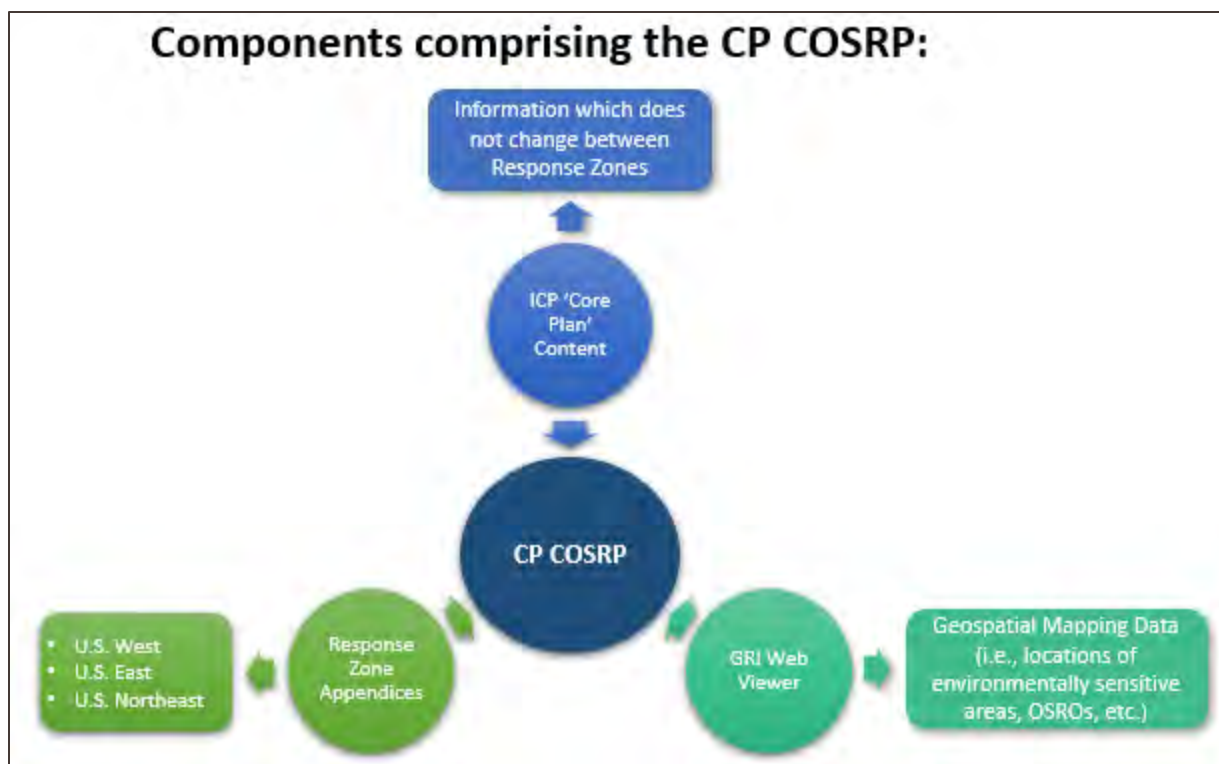
This ICP is used as the basis for and is incorporated into other CP emergency plans prepared to comply with specific oil spill response or contingency plan regulations. Two such instances are described below.

1.1.1.1 Comprehensive Oil Spill Response Plans (COSRPs)

In accordance with the U.S. Pipeline and Hazardous Materials Safety Administration's (PHMSA) Final Rule for Oil Spill Response Plans (OSRP) and Information Sharing for High-hazard Flammable Trains, 49 CFR, Subtitle B, Chapter I, Subchapter B, Part 130. 84 FR 6948, February 28, 2019, CP has prepared a COSRP. A COSRP is required for any railroad with routes or route segments used to transport a single train transporting 20 or more loaded tank cars of liquid petroleum oil in a continuous block or a single train carrying 35 or more loaded tank cars of liquid petroleum oil throughout the train.

Relevant portions of this ICP and its Annexes (constituting the COSRP's Core Plan¹), the three Response Zone Appendices (RZAs) prepared under separate cover, and the CP Geographical Response Information map application (GRI viewer), collectively comprise CP's COSRP for the U.S. These components and their relationships are shown graphically in Figure 1.

Figure 1. CP COSRP Components



¹ The COSRP Core Plan consists of relevant portions of this ICP excerpted and submitted to PHMSA for OSRP Final Rule Compliance. Section 2 of this document does not constitute the COSRP Core Plan for PHMSA-compliance purposes.

In Summary:

- CP's COSRP Core Plan presents information that does not change among different Response Zones.
 - The COSRP Core Plan consists of specific portions of the CP ICP and its Annexes which address OSRP Final Rule requirements for COSRP Core Plan content.
- CP RZAs provide additional information which differs among RZs.
- CP's GRI viewer supports the Core Plan and RZAs by identifying locations of environmentally sensitive areas, response resources, and other mapping requirements of the OSRP Final Rule.
 - CP's GRI viewer is located at https://gis.craworld.com/cp_na/ and can be accessed by credentialed personnel; agency review of this resource can be provided, upon request.

This ICP has been modified slightly to aid in meeting requirements of the OSRP Final Rule. Annex 11, Table A11.1 'PHMSA Final Rule Regulatory Requirements Cross-Reference Table' provides information on which CP resource(s) are relied upon for the fulfillment of individual COSRP requirements.

The OSRP Final Rule specifies response activities relative to the Worst-Case Discharge that are included in the RZAs. Worst-Case Discharge is defined as "the largest foreseeable discharge in adverse weather conditions [33 U.S.C. 1321(a) (24)] and includes discharges resulting from fire or explosion. The Worst-Case Discharge from a train consist is the greater of: (1) 300,000 gallons of liquid petroleum oil; or (2) 15 percent of the total lading of liquid petroleum oil transported within the largest train consist reasonably expected to transport liquid petroleum oil in a given Response Zone.

The OSRP Final Rule also requires an Information Summary within the Core Plan. This required Information Summary is provided on the following pages.

COSRP INFORMATION SUMMARY

Name and address of Railroad:

Canadian Pacific Railway: 7550 Ogden Dale Road S.E., Calgary, Alberta, TC2 4X9, Canada.

Descriptions of Response Zones:

RZA U.S. West: Includes Canadian Pacific Railway (CP)-owned route sections in Iowa, Minnesota, North Dakota and South Dakota, listed below.

Route Sections Contained in the RZ: CP-owned Subdivision and Yard Track Names		States and Counties Traversed by RZ Route Sections:	
Subdivision/Yard Name	Subdivision/Yard Name	State	County
Subdivision: BASS LAKE SPUR	Subdivision: SHELDON	Minnesota	Becker
Subdivision: BEMIDJI	Subdivision: ST PAUL		Dakota
Subdivision: CARRINGTON	Subdivision: TOMAH WEST		Dodge
Subdivision: DETROIT LAKES	Subdivision: TOMAH WEST Minnesota		Douglas
Subdivision: ELBOW LAKE	Subdivision: TRACY		Faribault
Subdivision: FORD PLANT	Subdivision: VEBLEN		Freebom
Subdivision: HARTLAND SPUR	Subdivision: WASECA		Goodhue
Subdivision: JACKSON	Subdivision: WEYBURN		Grant
Subdivision: LIGNITE	Subdivision: WITHROW		Hennepin
Subdivision: MARQUETTE MP 97.7-159 (end)	Yard: ENDERLIN		Houston
Subdivision: MASON CITY	Yard: FORDSON		Jackson
Subdivision: MERRIAM PARK	Yard: GLENWOOD		Kandiyohi
Subdivision: MN&S SPUR	Yard: HARVEY		Kittson
Subdivision: MONTANA	Yard: MINNEAPOLIS HUMBOLD		Lyon
Subdivision: NEWTOWN	Yard: MINNEAPOLIS IMS		Mahnomen
Subdivision: NOYES	Yard: MINOT		Marshall
Subdivision: OWATONNA	Yard: MPLS SHOREHAM		Martin
Subdivision: PAYNESVILLE	Yard: RIVER JCT		Meecker
Subdivision: PORTAL	Yard: ST PAUL		Mower
Subdivision: RIVER	Yard: THIEF RIVER FALLS		Olmsted
Subdivision: SAVAGE SPUR	Yard: VOLTAIRE		Otter Tail
			Pennington
			Polk
			Pope
			Ramsey
			Red Lake
			Scott
		Stearns	
		Steele	
		Wabasha	
		Minnesota	Waseca
			Washington
			Wilkin
			Winona
			Wright
		Iowa	Allamakee
			Cerro Gordo
			Chickasaw
			Clay
			Clayton
			Floyd
			Hancock
			Kossuth
			O'Brien
			Palo Alto
			Winneshie
		North Dakota	Barnes
			Burke
			Foster
			McHenry
			McLean
			Mountrail
			Ransom
			Richland
			Sheridan
			Stutsman
			Ward
			Wells
		South Dakota	Roberts

The U.S. West Response Zone also includes CP Trackage Rights route sections on non-Class 1 railroads in Minnesota, North Dakota, South Dakota and Iowa, listed below.

Route Sections Contained in the RZ: CP Trackage Rights on Non-Class 1 Railroads		States and Counties Traversed by CP Trackage Rights on Non-Class 1 Railroads:	
Track Owner: Subdivision Name	Subdivision Name	State	County
DMVW: Dakota		Minnesota	Dakota
DMVW: Napoleon			Hennepin
IANR: Mason City			Lincoln
MNNR: NA			Lyon
PGR: Egandale & Lakeville Lines			Ramsey
PGR: Lakeville, MN		Rice	
PGR: PGR		North Dakota	Burleigh
RCPE: Tracy			Richland
			Sargent
		South Dakota	Beadle
			Brookings
			Kingsbury
		Iowa	Cerro Gordo
			Floyd

RZA U.S. East: Includes CP-owned route sections in Illinois, Iowa, Missouri and Wisconsin, listed below.

Route Sections Contained in the RZ: CP-owned Subdivision and Yard Track Names

Subdivision/Yard Name
Subdivision: C&M
Subdivision: C&M WEST
Subdivision: CHICAGO
Subdivision: DAVENPORT
Subdivision: DAVENPORT NORTH
Subdivision: ELDRIDGE SPUR
Subdivision: ELGIN
Subdivision: FOX LAKE
Subdivision: KANSAS CITY
Subdivision: KANSAS CITY NORTH
Subdivision: LAREDO
Subdivision: M & P
Subdivision: MARQUETTE
Subdivision: MARQUETTE MP 0-97.7
Subdivision: NITRIN
Subdivision: OTTUMWA

Subdivision/Yard Name
Subdivision: ROCKFORD
Subdivision: TOMAH
Subdivision: TOMAH WEST
Subdivision: TOMAH WEST Wisconsin
Subdivision: UP KANSAS CITY
Subdivision: WATERTOWN
Yard: BENSENVILLE
Yard: BENSENVILLE IMS
Yard: BENSENVILLE WEST YD
Yard: GALEWOOD
Yard: LA CROSSE
Yard: MILWAUKEE
Yard: MILWAUKEE MEMONINEE
Yard: PORTAGE
Yard: SCHILLER PARK
Yard: STURTEVANT

States and Counties Traversed by RZ Route Sections:

State	County	State	County
Illinois	Carroll	Missouri	Caldwell
	Cook		Clay
	DeKalb		Grundy
	DuPage		Jackson
	Kane		Livingston
	Lake		Putnam
	Ogle		Ray
Rock Island	Sullivan		
Iowa	Appanoose	Wisconsin	Columbia
	Clinton		Dane
	Jackson		Dodge
	Jefferson		Jefferson
	Louisa		Juneau
	Monroe		Kenosha
	Muscatine		La Crosse
	Scott		Milwaukee
	Wapello		Monroe
	Washington		Racine
	Wayne		Rock
			Waukesha

The U.S. East Response Zone also includes CP Trackage Rights route sections on non-Class 1 railroads in Illinois, Indiana, Kansas, Missouri and Wisconsin, listed below.

Route Sections Contained in the RZ: CP Trackage Rights on Non-Class 1 Railroads

Track Owner: Subdivision Name
KCTL: Kansas City
WSOR: NA
IHB: NA
KCTL: Kansas City
IR: Rockford
CIRY: NA
BRC: NA
WSOR: Milwaukee
WSOR: Milwaukee
BRC: NA
IR: Rockford
IAIS: Nitrin

States and Counties Traversed by CP Trackage Rights on Non-Class 1 Railroads:

State	County
Illinois	Cook
	DuPage
	Ogle
	Rock Island
	Winnebago
Indiana	Lake
Kansas	Wyandotte
Missouri	Jackson
Wisconsin	Dane
	Milwaukee

RZA U.S. Northeast: Includes Canadian Pacific Railway (CP)-owned route sections in New York and Michigan, listed below. The U.S. Northeast Response Zone does not include any CP Trackage Rights route sections on non-Class 1 railroads.

Route Sections Contained in the RZ: CP-owned Subdivision and Yard Track Names

Subdivision/Yard Name
Subdivision: ADIRONDACK RUNNING TRACK
Subdivision: CANADIAN
Subdivision: CANADIAN CONNECTOR
Subdivision: COLONIE
Subdivision: COLONIE-KENWOOD
Subdivision: FREIGHT NORTH
Subdivision: STEVENSVILLE SPUR
Subdivision: WINDSOR
Yard: FORT TICONDEROGA
Yard: PLATTSBURGH
Yard: SARATOGA SPRINGS
Yard: ALBANY

States and Counties Traversed by RZ Route Sections:

State	County
Michigan	Wayne
New York	Albany
	Saratoga
	Schenectady
	Washington

- RZA boundaries are shown graphically on Figure 1 in each RZA document.
- Figure 2 in each of the RZAs shows detail of the area specific to that RZA, and the associated Spill Response Planning Zone.

24-hour number for all Qualified Individuals (QIs) and Alternates: CP Police Communications Centre/Midwest Operations Centre (800-716-9132)

- **QIs for each of the RZAs are included in each respective RZA and are summarized in Table 1:**

Table 1. QIs for Each RZA

Name/Position	Company/Title	Office Address	Mobile	Email
Primary QI				
Dale Buckholtz	Manager Emergency Response	120 South 6TH Street, Minneapolis, MN	612-904-6132	Dale_Buckholtz@cpr.ca
Alternate QIs				
Chris Miller	Dangerous Goods Officer	Bldg 9, 1702 – 30th Avenue SE, Calgary, AB	403- 863-3634	Christopher_Miller@cpr.ca
Ed Dankbar	Hazardous Materials and Emergency Response Officer	1010 Shop Road, St Paul, MN 55106	612-202-8497	Ed_Dankbar@cpr.ca
Mike Magee	Dangerous Goods Officer	2025 McCowan Rd Scarborough ON	613-929-6838	Michael_Magee@cpr.ca
Tony Houdyshell	Hazardous Materials and Emergency Response Officer	504 Slayton Blvd, Milwaukee, WI 53215	414-208-8546	Tony_Houdyshell@cpr.ca
Jon Gardiner	Dangerous Goods Officer	801 Gray Avenue, Saskatoon SK	306-716-5184	Jon_Gardiner@cpr.ca
Clemens Schimikowski	Hazardous Materials and Emergency Response Officer	55 Glenham Ave, Saratoga Springs, NY 12866	518-930-1772	Clemens_Schimikowski@cpr.ca
TBD	Dangerous Goods Officer	Bldg 1, 7550 Ogden Dale Road, Calgary AB	XXX-XXX-XXXX	@cpr.ca

1.1.1.2 British Columbia Spill Response Plan

The British Columbia (B.C.) Spill Contingency Plan² (C-Plan) is required by Division 2.1 Spill Preparedness, Response and Recovery of the Environmental Management Act (EMA), S.B.C. 2003, C. 53, (B.C. Regulations) administered by the B.C. Ministry of Environment and Climate Change Strategy. Section 91.11 of this amendment focuses on spill preparedness and the requirement for regulated persons to prepare C-Plans.

Under B.C. Regulations, a regulated person is a person who has possession, charge or control of liquid petroleum products in quantities: over 10,000 litres – as defined in the Spill Preparedness, Response and Recovery Regulation – for transport by rail.

The B.C. C-Plan demonstrates CP's capability, to the maximum extent practicable, of promptly removing spills of regulated substances and minimizing potential resource damages from a variety of spill sizes, up to and including worst-case spills of regulated substances transported on CP-operated tracks in B.C.

For fulfillment of B.C. Regulations, the B.C. C-Plan relies upon and references additional CP resources (under separate cover), including the CP ICP and its Annexes and the CP GRI System.

The C-Plan 'Regulatory Cross-Reference Table' (Table A11.2 in Annex 11) provides information on which CP resource(s) are relied upon for the fulfillment of individual B.C. Regulations requirements. In general, the ICP and its Annexes are relied upon to provide information on company-wide standard operating procedures/guidelines for health and safety, communication, initial spill assessment and actions, etc., while the CP GRI System provides geospatial data required in the 'Spill Response Planning Map'.

² The C-plan may also be referred to as a 'Response Zone Appendix' which covers B.C.

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 ICP:

1. ICP Introduction
2. ICP Core Plan³
3. ICP Annexes

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

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

³ As introduced in Section 1.1.1.1 the ICP Core Plan does not constitute the COSRP Core Plan for PHMSA-compliance purposes.

1.3 APPLICABLE REGULATIONS

The ICP has been prepared in general accordance with the regulatory requirements for emergency planning as outlined in Table 2 below:

Table 2. 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
British Columbia (B.C.) Ministry of Environment (BCMoE) and Climate Change Strategy	Division 2.1 - Spill Preparedness, Response and Recovery of the Environmental Management Act, S.B.C. 2003, C. 53.
Occupational Safety & Health Administration (OSHA)	29 CFR part 1910.120 Hazardous Waste Operations and Emergency Response (q) Emergency response program to hazardous substance releases (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 Duty to notify and avoid water pollution
Federal Railroad Administration	49 CFR Section 171.15 Immediate notice of certain hazardous materials incidents
U.S. 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 (NCP) and associated Area Contingency Plans (ACPs) described and included as links in the Response Zone Appendices (RZAs).
Transportation Safety Board (TSB)	Transportation Safety Board Regulations Part 1 Reports (5) Railway Occurrences
U.S. Pipeline and Hazardous Materials Safety Administration (PHMSA)	Final Rule for Oil Spill Response Plans and Information Sharing for High-hazard Flammable Trains; 49 CFR, Subtitle B, Chapter I, Subchapter B, Part 130. 84 FR 6948, February 28, 2019
National Response Center (U.S.)	At the earliest practicable moment, CP will notify the National Response Center (NRC) 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.
US Department of Transportation	49 CFR Part 130 Oil Spill Prevention and Response Plans

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

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

1.4 REVISION DATE & REVIEW PROCESS

This section provides the date that the ICP was last revised to identify the currency of the ICP. More detailed information on ICP 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
- Substantial changes defined by PHMSA for COSRPs⁴

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

1.5 ICP CUSTODIANS

Table 3. ICP Custodians

Safety and Sustainability	Regulatory and Environment
AVP Safety and Sustainability	Managing Director Environmental Risk
Hazmat Programs	Environment Programs & Operations
Director HazMat Programs	Director Environmental Programs & Operations
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	

Access to the ICP/Annexes and RZAs is available at CP's principle places of business and dispatch centers and to CP Qualified Individuals.

1.6 FACILITY IDENTIFICATION INFORMATION

CP facilities which have their own individual contingency plans are listed in Annex 4 of this ICP.

⁴ Defined in CP Response Zone Appendices (under separate cover).

1.7 PLAN STRUCTURE

This ICP has been organized into a modular framework. The ICP 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 ICP structure is interconnected through the following three primary sections:

1. ICP Introduction
2. ICP Core Plan
3. ICP Annexes

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

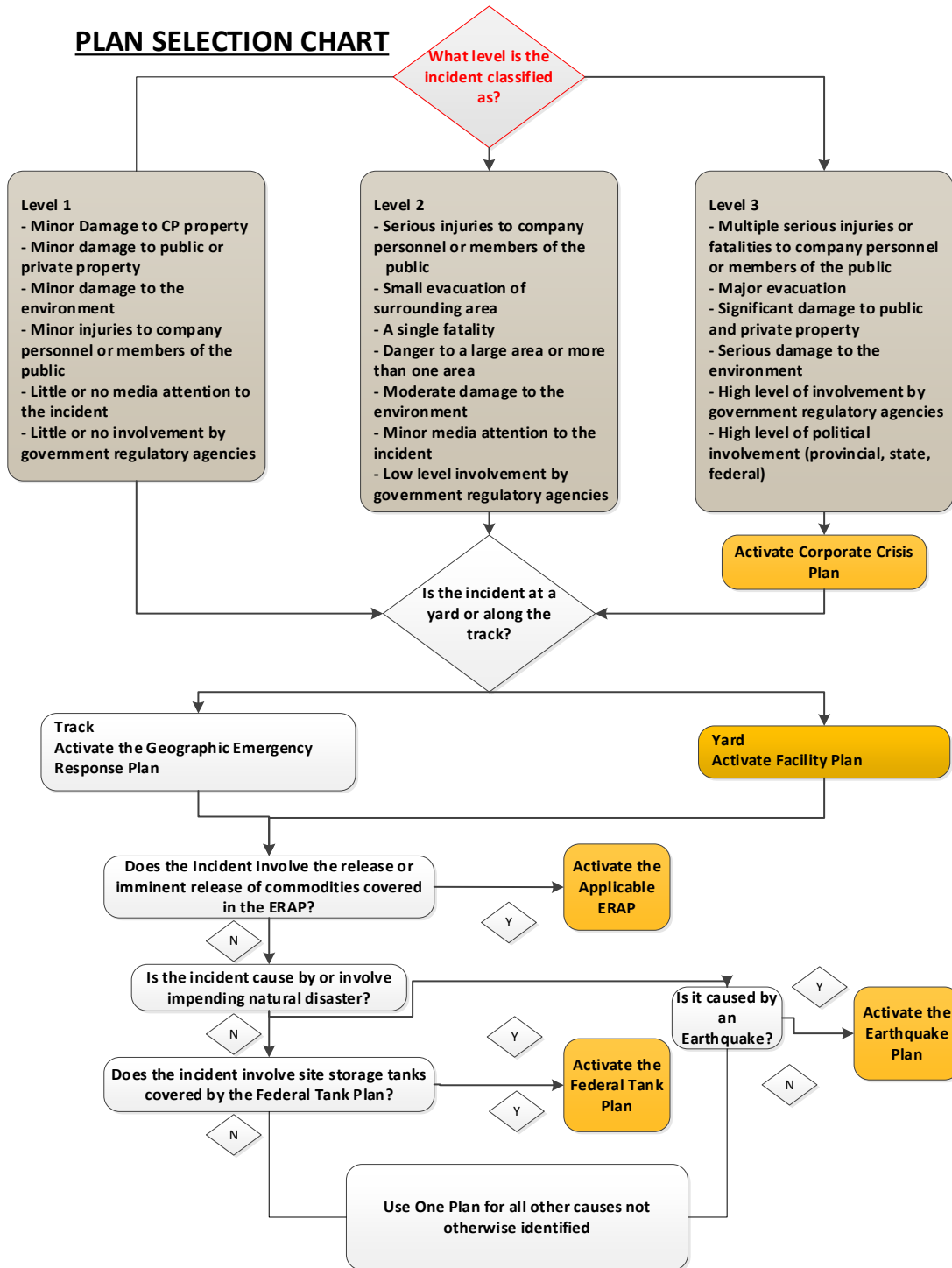
- Annex 1 ICS Structure and Implementation
- Annex 2 Notification and Reporting
- Annex 3 Contacts
- Annex 4 Response Plans
- Annex 5 Strategies and Tactics
- Annex 6 Response Contractors
- Annex 7 Emergency Response Incident Command Logbook and Forms
- Annex 8 Border Crossing Processes
- Annex 9 Training 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 to Emergency Response
- 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 Annex 4.

Figure 2 below integrates the supporting plan selection with the above event type and associated hazard with incident classification levels.

Figure 2. Plan Selection



SECTION 2

ICP CORE PLAN

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

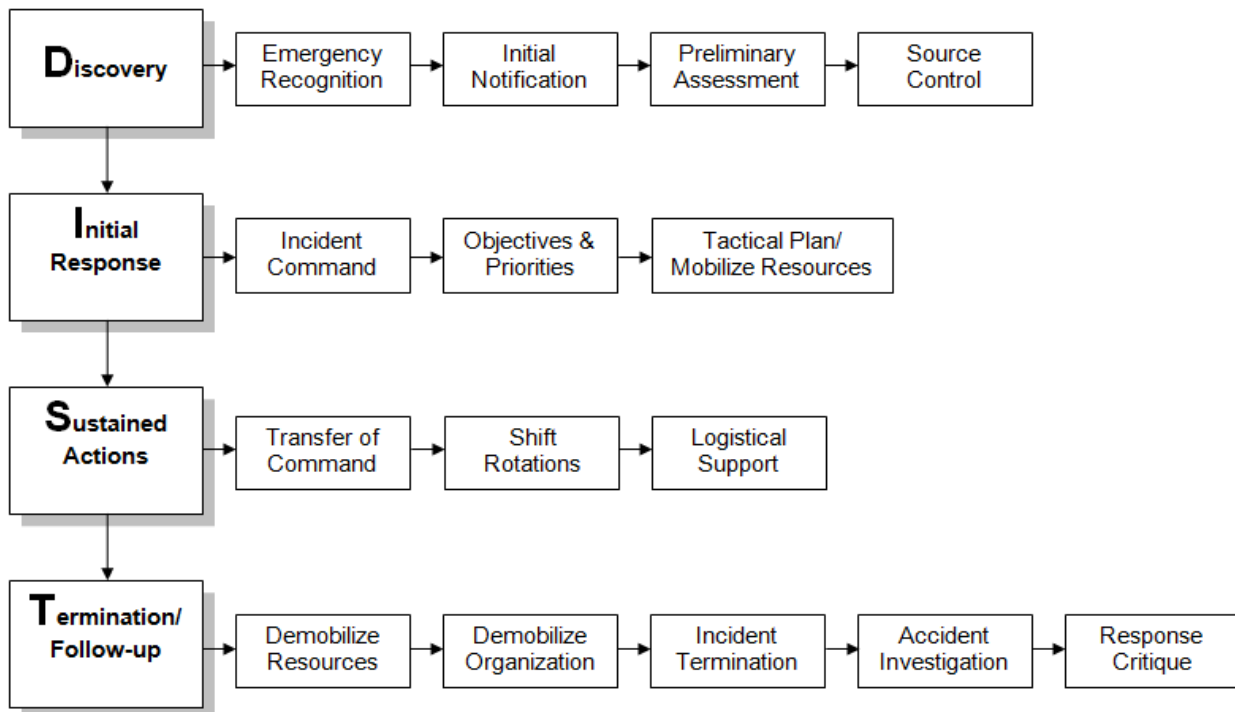
INITIATE EMERGENCY RESPONSE LOGBOOK IMMEDIATELY

- 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 ‘**EMERGENCY RESPONSE INCIDENT COMMAND LOGBOOK AND FORMS**’ in Annex 7 facilitates documentation during “operational periods” where sustained actions are required. Operational periods may be short in duration early in an incident (e.g., 3 hours or 6 hours) but will likely lengthen as the incident progresses (e.g., 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 3 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 3. 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 4 for the information to provide to the operations supervisor or Rail Traffic Controller / 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 Automatic Equipment Identification reading and records of cars picked up/set off en route)
 - Shipping documents / Waybill
 - Switch lists and any other available documentation
 - Emergency response information: (DOT-PHMSA Emergency Response Guide Book)
 - 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 4. Information to be provided by the first witness to the immediate supervisor (Yard) or Rail Traffic Controller (Main Track and All other Locations)

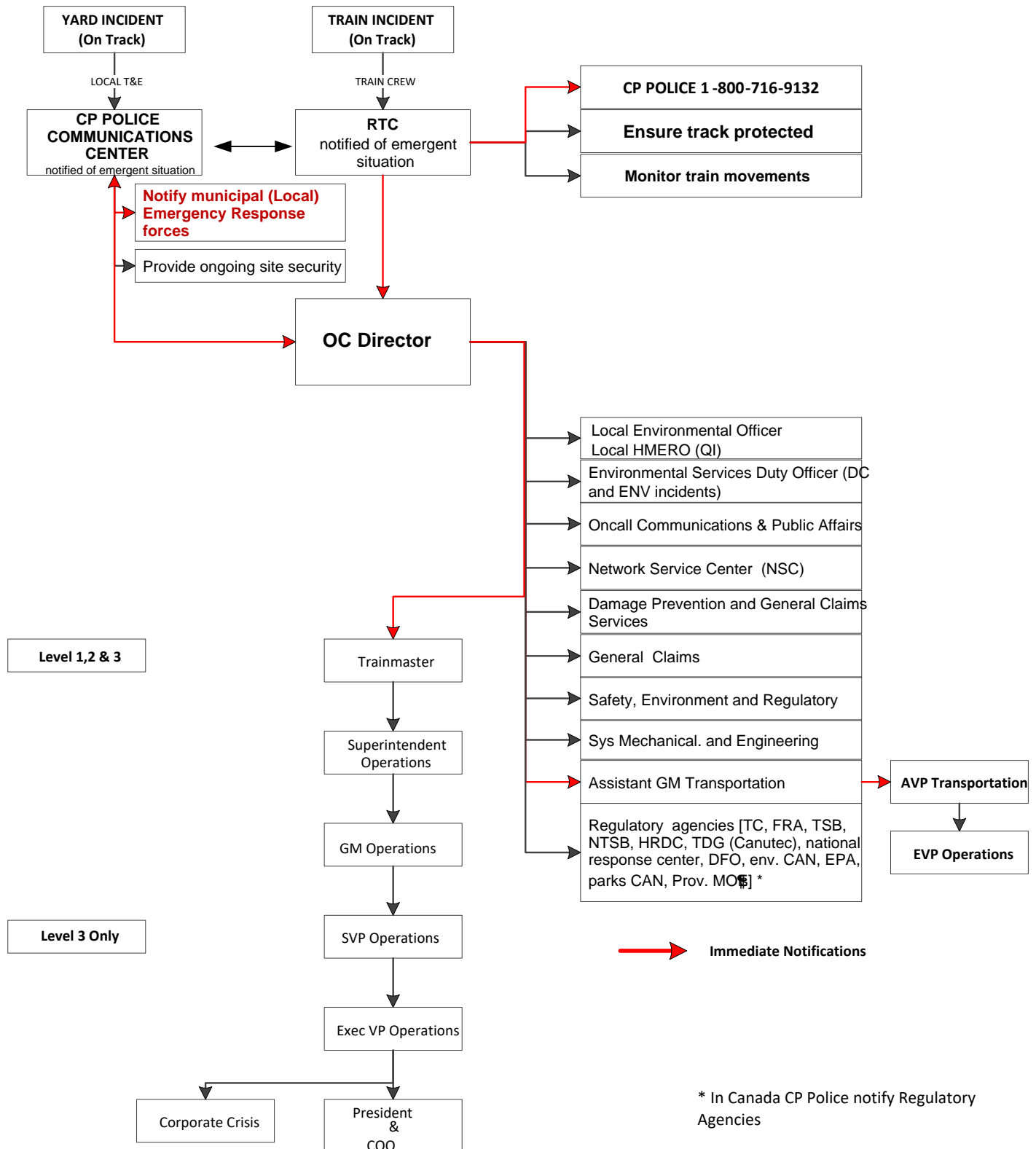
Information To Provide	Notes
Name, title (call-back number) of the person making the report	
Nature and extent of any injuries.	
Exact location of incident (subdivision and mileage)	
Time incident occurred	
Numbers and types of the cars that are directly involved in the incident and those in close proximity 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 4 and explained on the following pages. Figure 4 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.

Figure 4. Incident Notification Process

EMERGENCY RESPONSE GUIDELINES FOR TRAIN & YARD INCIDENTS



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. The primary and secondary communication methods by which notifications can be made are by telephone (cell and landline) and email.

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.

2.1.1.2.1 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 Section 2 'ICP Core Plan'). 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 Communication Centre (PCC) (1-800-716-9132). As deemed necessary, the CP PCC directly notifies municipal responders (Fire, Police, EMS).

2.1.1.2.2 Rail Traffic Controller

As depicted in Figure 4, when notified of an emergency regardless of magnitude, the Rail Traffic Controller is responsible for immediately advising the Operations Centre Director.

2.1.1.2.3 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 Hazardous Materials and Emergency Response Officer (HMERO)
- d) Mechanical & Engineering
- e) Senior Officers
- f) On-Call Public Affairs and Communications
- g) Network Service Centre
- h) Damage Prevention and General Claims

2.1.1.2.4 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 HMEMO until any products posing a threat to employee, responder and/or public health and safety, or the environment are under control.

2.1.1.2.5 CP Police

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

a) Municipal Responders

As conditions warrant, the CP PCC 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) 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 CP Police 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 CP Police 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).

c) Network Service Centre (NSC)

The NSC is responsible to efficiently deliver electronic copies of consists, waybills, MSDS, etc. to the CP Police, responders, HMEMO 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.

d) 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/HMERO 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 HMERO and/or EO and provides assistance mobilizing emergency response contractors and resources to the incident scene.

e) Regional Hazardous Materials and Emergency Response Officer (HMERO) / Environmental Officer (EO)

The Regional HMERO / Environmental Officer (EO) are subject matter expert for on scene response operations. For emergencies involving dangerous goods/hazardous materials, the HMERO 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 HMERO 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 HMERO 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.

f) 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; and
- Right of way fires.

g) 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 are likely to or have already come to the attention of the news media.

2.1.1.2.6 U.S. Only Notifications

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

a) National Response Center

In the U.S., at the earliest practicable moment, the CP Police must notify the National Response Center at 1-800-424-8802 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 USCG works closely with U.S. EPA, and may substitute for U.S.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;
- The National Transportation Safety Board (NTSB): Investigates serious or newsworthy accidents. The Nuclear Regulatory Commission 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) CP Qualified Individual (QI)

The MOC shall immediately notify the environmental on-call duty officer of incidents involving High Hazard Flammable Trains (HHFTs) by phone. The environmental on-call duty officer contacts the local EO and HMIRO (QI) (see Figure 4). See Sections 2.2.4.2 and 2.2.4.3 for additional information on QI roles and responsibilities. QIs are generally the individuals communicating with OSROs, or other entities providing personnel and equipment.

c) State and Local Emergency Management Agencies

State and local emergency management agencies have reporting requirements that vary. Annex 2, A2.5 and A2.6 provide a complete list of contact information and initial reporting requirements.

d) U.S. Fish and Wildlife Service

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

e) 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.

f) 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.

g) 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.

This section (Section 2.1.1.2) provides an overview of the roles involved in the initial notification process for emergencies. Annex 2, Annex 3, and the RZA ER Contact Sheet provide 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.); and
- 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 HMEMO in order to properly understand the incident magnitude.

2.1.2.2 Identifying the Specific Hazards Involved

The IC and/or HMERO 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); and
- 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 HMERO, 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 DOT-PHMSA Emergency Response Guidebook.

2.1.2.6 Health and Safety

In any response, the priority response objective is protection of public health and safety, which includes response worker health. Health and Safety considerations are integrated by CP throughout all aspects of response initiation and are presented in Annex 7, **EMERGENCY RESPONSE INCIDENT COMMAND LOGBOOK**, Section 1. The Hazard Assessment Action List will be used to develop a site-specific Health and Safety Plan using Incident Command System (ICS) Form 208 (also included in Annex 7). In general, the approach to Health and Safety will include:

- Assessing initial site safety issues and first responder/public safety;
- Working with local responders to protect life safety;
- Developing CP's Health and Safety Plan / Implementing site safety assessment(s)/PPE requirement(s).
- Identifying General CP Health and Safety Requirements and Site-Specific information on ICS Form 208;
- Performing and documenting air monitoring and developing an air monitoring plan, if necessary;
- Performing Job Hazard Analysis and Safety Briefing(s); and
- Maintaining the Health and Safety Plan with updated assessment information.

CP's Health and Safety programs comply with health and safety regulations guidelines (including OSHA requirements) to protect personnel, visitors, and the public from physical harm and exposure to hazardous materials or wastes are critical to a safe response and will be communicated and documented.

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; and
- 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 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.

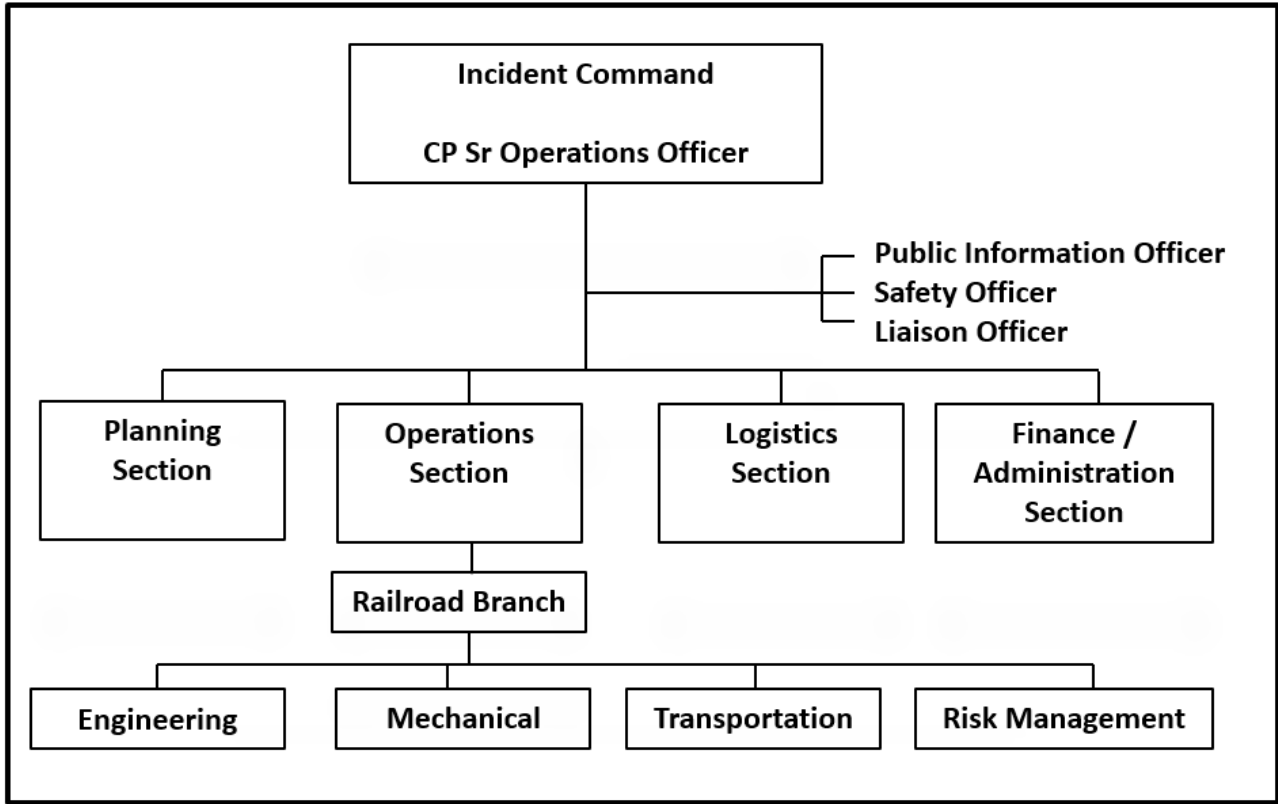
These five major management functions are the foundation upon which the ICS organization develops, and the foundation for responsibilities of the CP Incident Management Team (IMT). They apply for handling a routine emergency, organizing for a major event, or managing a major response to a disaster. The ICS provides maximum flexibility to activate as many positions within the functional areas as are necessary to handle the magnitude of an incident. CP’s IMT maintains a large group of well-trained personnel to lead and assist with emergency response incidents. The CP IMT is comprised of CP Dangerous Goods/HMEROs, Environmental Officers, Qualified Individuals (QIs), etc. IMT roles and responsibilities for each position are consistent with the job descriptions contained in the area contingency plans (ACPs), B. C. Spill Response Plans, and the USCG Incident Management Handbook.

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 5 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 5).

Figure 5. 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.

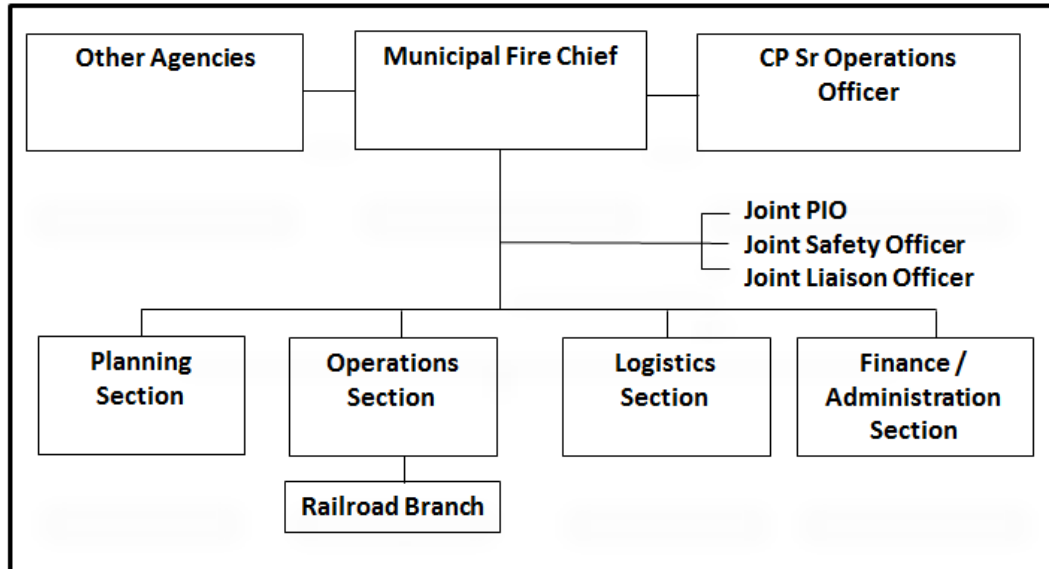
In the event of a major incident the UC would most likely consist of representatives from the shipper / consignee, the province / state, the city and/or federal representatives (Figure 6). Each of these representatives in the UC retains authority to control the resources it provides to the response effort. 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 UC System, the senior operations officer or designee will operate in a UC structure as the Railroad IC with the lead agency Incident Commander (Figure 6). Other Agencies may also be included in UC which could include Provincial/State Authorities, Local Municipality, Shipper / Consignee of the product.

Figure 6. CP’s Incident Command System/Unified Command



2.2.4 National Incident Management System (NIMS)

For more complex incidents, a NIMS structure needs to be established. This structure will be similar to the ICS discussed in Sections 2.2.1 through 2.2.3 and Annex 1 but adds additional terms and requirements as discussed below.

2.2.4.1 Local, State, and Federal On-scene Coordinator (LOSC, SOSC, and FOSC)

CP personnel and their response contractors, in conjunction with oil spill response organizations (OSROs), Response Organizations (ROs), and contractors, and agency responders including the local, state (or Provincial), and federal on-scene coordinators (LOSC, SOSC and FOSC) will use Unified Command (UC) to effectively unify command during spill response activities. For the purposes of this ICP, the term FOSC will be used as the primary On Scene Coordinator. The FOSC has the highest authority at the incident scene. At a small spill, a single individual may serve as the FOSC. Larger spills will use the UC structure to combine the various roles of federal, state, contractor, and responsible party personnel into a single group to respond to spills. When the command supervisory structure is unified under the ICS, it provides a standard organizational model for emergency response. By using standard terminology and common job descriptions, the UC allows the responsible party, contractor(s), and government agencies to meld into a single, coordinated organization to combat spills. This organization can then address the spill as a single unit and coordinate efforts to manage the issues that occur such as cleanup methods (e.g., use of dispersants and waste disposal methods) and avoidance of sinking agents as cleanup techniques.

The FOSC directs response efforts and coordinates all other efforts at the scene of a discharge or release. As part of the planning and preparedness for response, FOSCs are pre-designated by the regional or district head of the lead agency. U.S.EPA and the USCG pre-designate OSCs for all areas in each region.

The USCG provides FOSCs for oil discharges, including discharges from facilities and vessels under the jurisdiction of another federal agency, within or threatening the coastal zone. The USCG also provides OSCs for the removal of releases of hazardous substances, pollutants, or contaminants into or threatening the coastal zone (with some exceptions). U.S.EPA provides FOSCs for discharges or releases into or threatening the inland zone.

2.2.4.2 Qualified Individual (QI)

The QI is the person located in the vicinity of the incident who meets the requirements identified in U.S. federal regulations, and who is authorized to do the following: (1) activate and engage in contracting with oil spill removal organizations; (2) act as a liaison with the On-Scene Coordinator, and (3) obligate funds required to effectuate response activities. The specific QIs are identified in the RZAs.

The IMS structure begins with establishing the Command function. It is the responsibility of the QI or his/her designee to coordinate with the FOSC and in the initial stages of a response until relieved by a more senior QI or Incident Commander. The QI representing CP may also serve as the Incident Commander.

The QI will determine the need for the activation and mobilization of the IMT as part of the ICS. The IMT may be activated as a group or individually, depending upon the size, location, nature, and complexity of the incident. During a prolonged response, additional personnel may be cascaded in to sustain 24-hour operations. For the management of major incidents, the four functional units discussed in the previous sections are established under the Incident Commander as appropriate, i.e., Operations, Planning, Logistics, and Finance/Administration. Span-of-control (the number of individuals or resources than can be effectively managed by a supervisor during an incident) recommendations are followed closely as the response organization expands or contracts, so that the organizational structure is never larger than required. A recommended span of control should range from three to seven individuals, with five representing the optimal level. Exceptions may exist to this range, e.g., In cases of lower-risk assignments, assignments where resources work in proximity to each other, or assignments requiring minimal direct supervision.

Initial coordination of the response effort is the responsibility of the QI. Prior to the arrival of the QI, CP personnel have responsibilities to take actions described in Annex 7 ‘**EMERGENCY RESPONSE INCIDENT COMMAND LOGBOOK**’ Sections 1 and 2 that are generally discussed in Sections 2.2.5 and 2.2.6, so long as it has been established that it is safe to do so.

2.2.4.3 QI Duties and Authorities

The QI has the responsibility and authority to take such action as is necessary to protect human health and the environment and to coordinate remedial actions with governmental agencies. A QI or designated alternate will reside within a short period of travel time to the facility and will be trained in all aspects of the ICP and the RZAs.

The QI has the authority to commit moneys for spill response and to take all reasonable measures (including securing outside contractors) to ensure that fires, explosions, and releases do not occur, recur, or spread to other areas. These measures may include stopping facility operations, collecting and containing released materials, and removing or isolating containers. If facility operations are stopped, the QI must visually monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate. It is often the case, but not

always, that the QI and the Incident Commander are the same individual once command has been transferred from the initial FOSC.

Key duties of the QI are shown in Table 5 below:

Table 5. QI Key Duties

QI Key Duties
Assign an appropriate Incident Commander or request formation of a Unified Command.
Notify all oil spill response personnel, response contractors, IMT members, government agencies, and company representatives consistent with the notifications required under this ICP.
Identify the character, source, amount, and extent of the release and other necessary items needed for notifications.
Notify and provide information to appropriate federal, state, and local authorities.
Authorize the use of resources and work with appropriate federal, state, and local authorities to ensure the appropriate ICS response structure is formed.
Access company funds to initiate cleanup activities.
Direct cleanup activities until properly relieved of the responsibility or the incident is terminated.

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 Emergency Response 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 **Emergency Response 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 Emergency Response 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; and
- 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 **Emergency Response Incident Command Logbook** facilitates and standardizes the documentation which is the responsibility of the Incident Commander (IC). The **Emergency Response 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 **Emergency Response 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 information outlined in Annex 5 and Section 1 of **EMERGENCY RESPONSE INCIDENT COMMAND LOGBOOK** (Annex 7), 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; and
- 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. Specific response strategies including alternative response strategies (such as chemical agents, dispersants, in-situ burning, etc.) will be coordinated with the National Contingency Plan (NCP), the RZAs (including reference to the ACPs in Section 1.3 of the RZAs), and the B.C. Spill Response Plans.

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. Specific response tactics will be coordinated with the BCMoE Oil Spill Response Plans, the NCP, and ACPs described in Section 1.3 of the RZAs.

2.2.6.5 Site Coordination / Communications

The Incident Commander must ensure that the UC System maintains effective communications throughout the emergency response. ICS Form 205 may be used to coordinate communications activities. See Section 6 of the **EMERGENCY RESPONSE INCIDENT COMMAND LOGBOOK** (Annex 7).

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. ICS Form 205 can be used to facilitate a Communications Plan.

For incidents involving the establishment of a command post by CP, or in conjunction with an outside agency, CP Police will control site security. Emergency management contractors provide emergency management systems and resources as discussed in 2.2.6.6.3 and 2.2.7.1.

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 HMERO.

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 is imperative. An air monitoring plan will be developed and implemented as necessary.

The CP air monitoring Railroad Air Incident Deployment program (RAID) allows subject matter experts to connect with local contractors in order to effectively respond to emergencies involving air quality concerns. The CP RAID network consists of 15 specialized air monitoring kits owned by CP and managed by regional contractors in the program. As part of the program contractors are provided with the RAID kit equipment, expiry dates of consumables across the network are tracked and replacement equipment is ordered as required. Monthly calibration forms are tracked for each of the contractors and stored on a secure email filing database. The contractors in the CP RAID program have received hands-on training to use the air monitoring equipment and a web-based training program is being developed to refresh contractor training and allow new staff to become trained into the program.

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; and
- 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 HMERO 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 HMERO 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 HMEROs & EOs have training and experience to know their own capabilities and the capabilities of CP contractors and governmental agencies. The HMEROs 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 an incident. These include but are not limited to the following:

- Leak repair;
- Commodity transfers;
- Industrial fire fighting;
- Environmental cleanup and restoration; and
- Oil Spill Removal Organization (OSRO), RO, and ER Contractors (Collectively referred to as 'response contractors' in this ICP).

CP integrates (by contract) national, regional, and local spill response experts and response contractors that are able to provide response resources and expertise in areas including but not limited to, incident management, wildlife management, health and safety, oil spill and air dispersion modeling, toxicology, chemistry, fire-fighting, communications, waste management, railroad and commodity salvage to support tactical oil spill operations, and staff an IMT, as needed. Contracted incident management experts and associates are capable of supporting the CP IMT to manage large-scale incidents. IMT members receive position-specific ICS training as well as other role-specific specialized training. CP's Response Contractors have the authority to work within the established IMT. Evidence of IMT contracted personnel agreements is included in the RZAs.

Response Contractor personnel who are responsible for operating spill response equipment, receive annual hands-on training in the actual deployment and operation of equipment on an annual basis. Response Contractors perform their hands-on training classes in conjunction with the deployment of their equipment.

Response Contractors must have the ability to provide trained personnel necessary to continue operations. The Response Contractor manager, or agent, will maintain a listing of qualified personnel and maintain their training records.

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 HMEROs supported with employees from various departments.

Each member of the team has completed a minimum of 40 hours of initial training ICS 100 & 200 and meets the requirements necessary to assume the responsibility accorded to a railway incident. Additional training descriptions are included in Annex 9.

All HMEROs have additional specialized training and 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 HMERO, 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.

CP maintains contracts with Response Contractors to supply specialized equipment. The Response Contractor is responsible for testing, inspecting and maintaining the equipment in accordance to the manufacturers’ recommendations. Maintenance records are kept by the contractors. Equipment will also be tested during training, and exercises discussed in Annex 9, Training and Exercises.

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. Also see Section 2.1.2.6 regarding overall approach for Health and Safety.

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; and
 - The availability of other response mechanisms.

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 6 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 6. 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 en route and/or ordered;
- Facilities established;
- Communications plan; and
- 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.).

2.3.4 Wildlife Response

CP wildlife responses are generally guided by the Wildlife Response Plan. The Wildlife Response Plan outlines initial wildlife response actions, structure and function of the Wildlife Branch in an incident command structure, personnel including work force management and training, and field/rehabilitation operations, etc. Wildlife Response Plan Appendices provide supporting forms, checklists and information on pre-identified wildlife resource-at-risk locations.

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 Handbook 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; and
- 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; and
- 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; and
- 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.

Insurance Company representatives are contacted by the Risk Management Department. Information on contacting CP claims and insurance representatives through the Risk Management Department is included on the RZA ER Contact sheet.

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.

2.4.11 Waste Management

The collection, storage, transport, treatment, and disposal of wastes generated during a spill cleanup can require a significant logistics effort and must be managed in compliance with federal, provincial, state, and local regulations. Whenever possible, CP attempts to recycle commodities recovered and materials generated during response efforts to reduce waste quantities. Materials which cannot be recycled may include both hazardous and non-

hazardous wastes such as oily or contaminated debris, oiled or contaminated material such as sorbent and boom, contaminated PPE, contaminated soil, oil/water mixes, and other waste from staff support and logistics.

As appropriate to the incident, a waste management plan will be prepared to describe the details of how waste will be managed and how the entire volume of recovered wastes will be tracked and accounted for over the course of the response effort. The plan will cover all aspects of waste management including regulatory compliance, training, quantities and types of waste, waste minimization and segregation, temporary and interim storage, transport, and disposal arrangements. Temporary staging areas cannot be designated in this plan due to the nature of rail incidents. Staging will be addressed in the specific Waste Management Plan.

BCMoe Oil Spill Response Plans and ACPs contain resources for Waste Management and Disposal.

- CP will coordinate with a disposal company to coordinate all non-hazardous waste disposals. The disposal company will identify and provide non-hazardous waste disposal options to CP Environmental Services.
- Per CP procedures, the disposal of hazardous waste from emergency response or remediation activities should be coordinated through CP Environmental Services. The transportation and disposal of hazardous waste requires specialized training in profiling, manifesting, and recordkeeping. All CP staff and consultants/contractors involved in the management, transportation, and disposal of hazardous waste are required to have appropriate training. The disposal of hazardous waste should be limited to CP-approved facilities. Questions regarding the potential approval of any facility can be directed to CP Environmental Services.

SECTION 3
ANNEXES

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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	Emergency Response Incident Command Logbook and Forms
Annex 8	Border Crossing Processes
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 Revision Control
Annex 13	A Disciplined Approach to Emergency Response
Annex 14	Derailment Scene Handbook