

A technical publication from Alberta EDGE
(Environmental and Dangerous Goods Emergencies)

Emergency Response Assistance Plan

November 2021

Emergency Response Assistance Plan
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This material is meant as a guide to certain parts of the Transportation of Dangerous Goods Regulations and is not meant to be a substitute for them. It is the responsibility of handlers, offerers and transporters of dangerous goods to consult the Regulations for the exact requirements. Alberta EDGE (Environmental and Dangerous Goods Emergencies) of Alberta Transportation can provide accurate information regarding the Regulations 24 hours a day.

These telephone lines are recorded to assist in responding to the emergency (natural/manmade) and/or inquiry regarding Dangerous Goods and to ensure that the information is accurate. Direct any questions regarding the recording to the Regulatory Compliance Office responding to your call or contact the manager of Alberta EDGE at 780-427-8660. Legal Authority: Dangerous Goods Transportation and Handling Act, Section 13(1).

For more information regarding this bulletin visit:

<https://www.alberta.ca/safety-bulletins-and-notice-transportation-of-dangerous-goods.aspx>

What is an ERAP?

An **ERAP** is an **Emergency Response Assistance Plan** that outlines and describes the actions to be taken to respond to a release or anticipated release of certain higher risk dangerous goods in the course of their handling or transporting that endangers, or could endanger, public safety [Section 7(2), *Transportation of Dangerous Goods Act, 1992* and Section 1.4, *Transportation of Dangerous Good Regulations*]. The *Transportation of Dangerous Goods Act, 1992* (TDG Act) and the *Transportation of Dangerous Goods Regulations* (TDGR) comprise the regulatory framework for the ERAP program.

Each ERAP is specific to certain dangerous goods, mode of transport (road, rail, air or marine), the type and specification of the means of containment used to transport the dangerous goods and the geographical area in which the dangerous goods are transported. It also provides information concerning the emergency response capabilities: information regarding the ERAP response equipment and personnel's responsibilities, knowledge, experience and training; release/anticipated release scenarios and their possible consequences; measures to be taken in response to the release/anticipated release for each scenario; the identification of persons responsible for the measures; and copies of any agreements with third-party emergency responders (Section 7.3). An ERAP is intended to assist emergency responders by providing them with specialized expertise, equipment, or response teams when needed for responding to an incident. It also ensures that the risks associated with transporting these dangerous goods are well understood, and that appropriate measures are in places.

ERAPs **may** be used along with emergency response plans (ERP) from other organizations, for example, carriers and local or provincial authorities. An incident management system, usually the Incident Command System (ICS), ensures coordination between the ERAP and other ERPs.

Who has an ERAP?

Persons who have ERAPs are involved in the transportation of dangerous goods in quantities or concentrations that require an ERAP. They are often **producers, manufacturers or distributors** of dangerous goods. The TDG Act requires any **person importing or offering for transport** certain higher risk dangerous goods where the **total quantity or concentration is greater than or equal to the quantity specified by the index number in Column 7 of Schedule 1** to have an **approved ERAP** [Sections 7(1)(a) and 7(1)(b), TDG Act and Section 7.2, TDGR]. In cases where no person is importing or offering for transport the dangerous goods, **persons handling or transporting** these dangerous goods require an ERAP [Section 7(1)(c), TDG Act and Section 7.2, TDGR]. It is the responsibility of the **person importing, offering for transport, handling or transporting** the dangerous goods for which an ERAP is required to establish the ERAP and have it approved by Transport Canada [Section 7(1), TDG Act and Sections 7.2 and 7.3, TDGR].

Persons such as **emergency response contractors** who are not required to have an approved ERAP but who are able to take measures to respond to a release or anticipated release of dangerous goods **may** still have an approved ERAP plan (Section 7.4).

A person with an approved ERAP may allow another person to use their ERAP as an **authorized user**. The authorized user will **not** need to apply for an ERAP approval if:

- The authorized user is not the producer of the dangerous goods to which the ERAP relates;
- The ERAP applies to the **dangerous goods, the mode of transport, the means of containment and the geographical area** in which the dangerous goods will be in transport;
- The person with the approved ERAP agrees to **take measures to respond** to a release or anticipated release of the dangerous goods to which the ERAP relates; and
- The person with the approved ERAP provides a **written authorization** to the authorized user [Section 7.7(1)].

When requested by Transport Canada, the authorized user must now show **proof of their authorization** to use another person's ERAP [Section 7.7(2)]

There is **no requirement** for a federally **approved ERAP** for mitigating incidents involving the **transport of dangerous goods in the United States**. Canada's ERAP program is unique.

Requirement to Have an Approved ERAP

An ERAP **must** be submitted to the Minister of Transport for approval [Sections 7.2 and 7.3(1)] for:

- Dangerous goods that have the **same UN Number** and that are contained in a **single means of containment**, if the quantity of those dangerous goods exceeds the ERAP index in Column 7 of Schedule 1 [Section 7.2(1)(a)];
- Dangerous goods, in a road vehicle or railway vehicle, that have the **same UN Number** and that are contained in **more than one means of containment**, if the total quantity of those dangerous goods exceeds the ERAP index in Column 7 of Schedule 1 and are included in one of the following classes:
 - **Class 3**, Flammable Liquids, with a **subsidiary class of 6.1**, Toxic Substances,
 - **Class 4**, Flammable Solids; Substances Liable to Spontaneous Combustion; Substances That on Contact with Water Emit Flammable Gases (Water-reactive substances),
 - **Class 5.2**, Organic Peroxides, that are **Type B or Type C**,
 - **Class 6.1**, Toxic Substances, that are included in **Packing Group I** [Section 7.2(1)(b)];
- Dangerous goods, in a road vehicle or railway vehicle, that have the **same UN Number**, and that are contained in **more than one large means of containment**, if the total quantity of those dangerous goods exceeds the ERAP index in Column 7 of Schedule 1 [Section 7.2(1)(c)];
- Dangerous goods, in a road vehicle or railway vehicle, that are included in **Class 1**, Explosives, and that are contained in **one or more means of containment**, if the total quantity of those dangerous goods exceeds the ERAP index in Column 7 of Schedule 1 for the explosives with the lowest index number in the column [Section 7.2(1)(d)];
- Dangerous goods that are included in **Class 2**, Gases, that have the **same UN Number**, that are contained in **more than one means of containment** – each of which has a **capacity greater than 225 L** – that are a **single unit** as a result of being interconnected through a piping arrangement and that are permanently mounted on a structural frame for transport, if the total quantity of those dangerous goods exceeds the ERAP index in Column 7 of Schedule 1 [Section 7.2(1)(e)].

- Any of the following dangerous goods that are **transported by rail** in a tank car, if the quantity of those dangerous goods in the tank car **exceeds 10,000 L**:
 - **UN1170**, ETHANOL with more than 24% ethanol, by volume, ETHANOL SOLUTION with more than 24% ethanol, by volume, ETHYL ALCOHOL with more than 24% ethanol, by volume, or ETHYL ALCOHOL SOLUTION with more than 24% ethanol, by volume,
 - **UN1202**, DIESEL FUEL, GAS OIL, or HEATING OIL, LIGHT,
 - **UN1203**, GASOLINE, MOTOR SPIRIT, or PETROL,
 - **UN1267**, PETROLEUM CRUDE OIL,
 - **UN1268**, PETROLEUM DISTILLATES, N.O.S., or PETROLEUM PRODUCTS, N.O.S.,
 - **UN1863**, FUEL, AVIATION, TURBINE ENGINE,
 - **UN1987**, ALCOHOLS, N.O.S.,
 - **UN1993**, FLAMMABLE LIQUID, N.O.S.,
 - **UN3295**, HYDROCARBONS, LIQUID, N.O.S.,
 - **UN3475**, ETHANOL AND GASOLINE MIXTURE, with more than 10% ethanol, ETHANOL AND MOTOR SPIRIT MIXTURE, with more than 10% ethanol, or ETHANOL AND PETROL MIXTURE, with more than 10% ethanol, and
 - **UN3494**, PETROLEUM SOUR CRUDE OIL, FLAMMABLE, TOXIC [Section 7.2(1)(f)]; and
- Any quantity of dangerous goods that are **Risk Group 4 human pathogens** within the meaning of the “Human Pathogens and Toxins Act” [Section 7.2(1)(g)].

Any substance that would require an ERAP if its classification were determined in accordance with Part 2 (Classification) in the TDGR requires an approved ERAP if its appropriate classification in the ICAO Technical Instructions, the IMDG Code or the UN Recommendations is to be used [Sections 2.2(4) and 7.2(2)].

Once evaluated and approved, **Transport Canada issues an ERAP reference number** that ***must***, along with the **ERAP telephone number and area code** to call the person identified in the ERAP, appear **on the shipping document** when importing, offering for transporting, handling or transporting dangerous goods for which the approved ERAP is required [Section 7(1), TDG Act and Sections 3.6(1) and 7.3(2)(f), TDGR]. Every ERAP ***must*** have an ERAP telephone number and when a consignment requires an ERAP, this number is found on the shipping document. The requirement for an ERAP also determines placarding requirements (Sections 4.15.1 and 4.15.2).

ERAP Index

Column 7 of Schedule 1 gives the quantity above which an approved ERAP is required in accordance with Section 7.1, Application, of Part 7 (Emergency Response Assistance Plan). The quantity is expressed in **kilograms for solids**, in **litres for liquids**, and, for **gases, as the capacity of the means of containment**. For **Class 1, Explosives**, the quantity is expressed in either **kilograms** or **net explosives quantity (NEQ)** or, if the explosives are subject to **Special Provision 85** or **Special Provision 86**, the **number of articles**. The quantity applies to the row in Schedule 1 in which it appears. For example, UN1986 may require an ERAP for Packing Group I but not for Packing Group II or III. If no index is shown, an ERAP is ***not*** required unless the dangerous goods are subject to Special Provision 84 or 150 [Schedule 1 Legend].

For example, the ERAP index for UN1075, LIQUEFIED PETROLEUM GASES, Class 2.1, is 3,000 L as per the entry in Column 7 of Schedule 1:

Col.1 UN Number	Col.2 Shipping Name and Description	Col.3 Class	Col.4 Packing Group / Category	Col.5 Special Provisions	Col.6a Explosive Limit and Limited Quantity Index	Col.6b Excepted Quantities	Col.7 ERAP Index
UN1075	LIQUEFIED PETROLEUM GASES; or PETROLEUM GASES, LIQUEFIED	2.1			0.125 L	E0	3000

ERAP Implementation

ERAPs are implemented to respond to a release or anticipated release of dangerous goods that are part of that plan. The person with the ERAP is responsible for implementing the ERAP as this person is the most familiar with the resources in the ERAP. An ERAP must be implemented when a release or anticipated release of dangerous goods to which the ERAP plan pertains endangers or could endanger public safety. A person with the approved ERAP must implement it to tier 1 or tier 2 in response to a release or anticipated release of dangerous goods that are part of that plan [Section 7.8(1)].

A person who implements an approved ERAP to **tier 1** must:

- **Provide technical or emergency response advice** as soon as possible after a request for the advice; and
- **Remotely monitor the response** to the release or anticipated release [Section 7.8(2)].

A person who implements an approved ERAP to **tier 2** must:

- **Provide technical or emergency response advice** as soon as possible after a request for the advice; and
- **Monitor the response** to the release or anticipated release; and
- **Send ERAP emergency response resources** to the location of the release or anticipated release [Section 7.8(3)].

When necessary to protect public safety, **Transport Canada can**:

- **Direct a person with an approved ERAP to implement their plan** in order to respond to a release or anticipated release; and
- **Authorize a person with an approved ERAP to implement their plan**, if it is unclear who is required to have an ERAP for the dangerous goods in an incident [Section 7.1, TDG Act].

ERAP Incident Report

Any **person who has the charge, management or control of a means of containment** at the time of a release or anticipated release of dangerous goods in respect of which an approved ERAP is required ***must, as soon as possible*** after the release or anticipated release, **make an ERAP incident report by telephone** to the **person who has the ERAP** at the ERAP telephone number required to be included on the shipping document if the **dangerous goods are, or could be, in excess of the quantity** set out in the below table [Sections 7(1) and 18(1), TDG Act and Sections 3.6(1)(b), 7.8 and 8.20, TDGR].

Class	Quantity
1, 2, 3, 4, 5, 6 or 8	Any quantity
7	A level of ionizing radiation greater than the level established in section 39 of the "Packaging and Transport of Nuclear Substances Regulations, 2015"

An ERAP incident report ***must*** include the following information:

- The **name and contact information** of the person making the report;
- The **ERAP reference number**;
- In the cause of a **release** of dangerous goods, the **date, time and geographic location** of the release;
- In the case of an **anticipated release**, the **date, time and geographic location** of the incident that led to the anticipated release;
- The **mode of transport** used;
- The **shipping name or UN Number** of the dangerous goods;
- The **quantity** of dangerous goods was in the means of containment **before the release or anticipated release**;
- In the case of a release, the **quantity of dangerous goods estimated to have been released**;
- A **description of the means of containment** containing the dangerous goods;
- An indication of whether a **means of containment** has been **damaged** to the extent that its **integrity could be compromised**;
- An indication of whether a **transfer of the dangerous goods** to another means of containment is anticipated or required; and
- If applicable, the **type of incident leading to the release or anticipated release**, including a collision, rollover, derailment, overfill, fire, explosion or load-shift (Section 8.21).

An **ERAP incident report** ensures an initial notification of the release or anticipated release to the ERAP holder so that the ERAP holder has the pertinent information necessary to make a timely and informed decision to implement the plan and to what response tier.

Calling the ERAP telephone number listed on the shipping document **does not** automatically trigger an ERAP implementation. **The person identified in the ERAP can be reached at any time while the dangerous goods are handled or transported.** Anyone can call the ERAP telephone number for assistance or technical or emergency response advice without automatically triggering implementation of the plan [Section 7.3(2)(f)].

ERAP Implementation Report

Once the person who has the ERAP is contacted through the ERAP telephone number, the person with the approved ERAP is responsible for implementing the ERAP and can determine the actions to take to effectively respond to the release or anticipated release. When the person who has the approved ERAP implements the ERAP to tier 1 or tier 2, the person must, as soon as possible, make an ERAP implementation report to CANUTEC (Canadian Transport Emergency Centre) at 1-888-CANUTEC (1-888-226-8832) or 613-996-6666 (Section 8.22).

An ERAP implementation report must include the following information:

- The **name and contact information** of the person making the report;
- The **ERAP reference number**;
- If applicable, the **person authorized to use the ERAP**;
- Whether the ERAP was implemented to **tier 1 or tier 2**;
- The **date and time that the ERAP was implemented** to tier 1 or tier 2;
- The **shipping name or UN Number** of the dangerous goods in relation to which the ERAP was implemented; and
- The **measures taken to respond** to a release or anticipated release (Section 8.23).