

Title:	Oil Transloading Facilities Acceptable Industry Practices
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What is an Oil Transloading Facility?

Transloading is the process of loading a shipment from one mode of transportation to another.

A crude oil transload facility includes:

- any building, structure, installation, equipment or appurtenance that is connected to or associated with handling, storing, processing and loading primarily unrefined liquid hydrocarbon-based resources (crude oil) into railcars;
- offloading from trucks and/or pipelines; and loading into railcars.

Oil transloading facilities do not include trucks, trailers, railcars or rail lines; these facilities and equipment are regulated by Alberta Transportation and Transport Canada.

Environmental Safeguards

Potential environmental concerns associated with transload facilities include air emissions, off-site odours, and spills.

Air Emissions & Odour Controls

Volatile organic and sulphur compounds are released during transfer and storage of hydrocarbons. Because the amount and type of VOC changes with each product, proper emission controls must be in place prior to handling each product. Guidelines include:

- Canadian Council of Ministers of the Environment *Environmental Guidelines for Controlling Emissions of Volatile Organic Compounds from Aboveground Storage Tanks*.
- Canadian Council of Ministers of the Environment *Environmental Code of Practice for the Measurement and Control of Fugitive VOC Emissions from Equipment Leaks*.
- [AER Directive 060: Upstream Petroleum Industry Flaring, Incinerating, and Venting](#)
- [AER Directive 084: Requirements for Hydrocarbon Emission Controls and Gas Conservation in the Peace River Area](#)
- [AER Hydrocarbon Odour Management Protocol](#)

Spill Prevention & Containment

All tanks must be contained by structural and impermeable berms which incorporate a synthetic liner extending under the tank. Minimum standards include:

- *Alberta Fire Code 2014*;
- Guidelines for Secondary Containment for Above Ground Storage Tanks, Alberta Environmental Protection, 1997, as amended; and
- [AER Directive 055: Storage Requirements for the Upstream Petroleum Industry](#)

Procedures include:

- precautions to prevent spills during fluid transfer including sealed couplings, emergency shut-off valves, and established transfer areas;
- equipment required on-site for cleanup;
- emergency plans to deal with spills, fires and other incidents
- storage tanks equipped with level measurement, high level alarms, and an automatic shut-off device to prevent overflow from occurring;
- surface run-off collected and tested prior to release; and
- **reporting spills to the Energy & Environmental Response Line at 1-800-222-6514 and the local fire department.**

Record Keeping

Detailed records must be maintained and available for information on the oil transloaded and any spills, odours or complaints.

Regulatory Authorities

Alberta Environment and Parks (AEP) regulates the environment under the *Environmental Protection and Enhancement Act* (EPEA). EPEA Sections 109-112, Substance Release Regulation, and the Release Reporting Regulation specify substance release responsibilities.

The EPEA Activities Designation Regulation should be reviewed to determine if any activities at the proposed facility require EPEA authorization, such as:

- an approval for a bulk petroleum storage facility. Refer to the Bulk Petroleum Storage Guidance Directive for clarification;
- an approval for a rail car washing facility;
- or a registration for a small incinerator.

The **Alberta Energy Regulator (AER)** regulates facilities associated with energy resource development (batteries, gas processing plants) and provincial pipelines and related installations (pumping stations,

storage facilities) including rail loading facilities that are components of those facilities or installations under the *Pipeline Act*, the *Oil and Gas Conservation Act* and the *Oil Sands Conservation Act*.

The AER regulates crude oil transload facilities that have upstream oil and gas infrastructure; if there is a pipeline to the facility, the transload facility could be considered a loading facility under the *Pipeline Act* and Regulations.

Alberta Transportation regulates rail lines in the facilities, trucking and the transportation of dangerous goods under the *Railway Act* and the *Dangerous Goods, Transportation and Handling Act*. All sites that own or lease track from either CN or CP Rail by way of a “siding agreement” are under provincial jurisdiction. Railway operators are required to obtain operating approvals under the *Railway Act* from Alberta Transportation.

Alberta Transportation developed the following regarding transfer of dangerous goods:

- [Industrial Railway Circular No. 1 Guideline for the Transfer of Dangerous Goods to or from a Railway Vehicle](#)
- [Industrial Railway Circular No. 2 Guideline for the Development of Security Management Program for Dangerous Goods Transfer Sites](#)

The Alberta Transportation Co-ordination and Information Centre (CIC) provides information to the general public and industries on transportation of dangerous goods (TDG) compliance. The CIC is also an **emergency response centre for all TDG incidents**. For more information, please contact the CIC at **1-800-272-9600**.

Alberta Municipal Affairs (AMA) oversees the application and enforcement of the *Safety Codes Act* which includes the Alberta Fire Code, the Canadian Electrical Code, the Natural Gas and Propane Codes, the Pressure Vessels Regulations, and the Alberta Building Code all of which are likely to have some application at a transloading facility. As such safety codes permits (and inspections) for any tank storage of crude oil, piping installations, all electrical installations and gas fueled equipment on site, plus operating certificates for any pressure vessels, will be required from the Authority Having Jurisdiction (AHJ) under the Safety Codes Act. The AHJ can be determined by looking up the **local municipal authority** (city, town, village, or municipal district or specialized municipality) on the AMA website at <http://www.municipalaffairs.gov.ab.ca/permits> or alternately by calling 1-866-421-6929.

Information and Reporting Contact Information

AER Jurisdictional Queries: Jurisdiction.Queries@aer.ca

Alberta Transportation Co-ordination and Information Centre (CIC)
1 800 272-9600

Alberta Environment and Parks Co-ordination and Information Centre (CIC)
1 800 222-6514

Alberta Municipal Affairs Communication Inquiry Centre (CIC)
1 866 421-6929
Safety.services@gov.ab.ca

The Fire Administrator at AMA will be able to provide additional guidance. In non-accredited areas the Alberta Safety Codes Authority will be the AHJ.

The land use planning and development processes under the *Municipal Government Act* (MGA) need to be considered. The appropriate individual to initiate these discussions with is usually the municipal development officer (development authority) in the respective city, town, village, municipal district, or specialized municipality.

In addition to the planning and development processes, the local municipal authority has the direction, control and management of road and road diversions surveyed for the purpose of opening a road allowance with the exception of roads under the jurisdiction of Alberta Transportation. If access involves using a municipal road, you may require approvals.

Local authorities should be contacted early in the planning stages of any transloading facility.

Original signed by: Randall Barrett

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Executive Director
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Environment and Parks