7.0 EMERGENCY RESPONSE AND PREPAREDNESS PLAN

The Emergency Response and Preparedness Plan ("ER&PP") for propane releases from Breakaway Fuels addresses two types of releases: on-site (generally small) releases and off-site or external releases.

Most aspects of the ER&PP are associated with post-incident response and are not considered preventative. Some components of the ER&PP however are designed to mitigate damage or prevent incident escalation. Where appropriate, these aspects of the ER&PP have been factored into the Quantitative Risk Assessment in Section 9.

7.1 Requirement for Emergency Response and Assistance Plan

Breakaway Fuels stores propane on site in a single 25,383 USWG horizontal ASME tank that is 20,383 USWG over the maximum volume permitted under the new legislation to permit a Level I RSMP submission. The facility has the potential to store a maximum of approximately 75,576 USWG of propane liquid between the storage tank, trucks, and various sized cylinders and tanks.

Since the storage is over the 5000 USWG limit, the company is required under the new regulation to prepare a Level 2 RSMP submission. In regards to Transport Canada Regulations, the Breakaway Fuels facility does have to have an Emergency Response & Assistance Plan (ERAP) as they transport propane with their own vehicles. Breakaway Fuels does have a registered plan and they are allowed to use this plan as members in good standing with the Canadian Propane Association (CPA).

At any point during an incident, leak and or fire the Canadian Propane Association Emergency Response Assistance Plan can be activated. Breakaway Fuels are members in good standing with this association, and can call on this mutual aid program which is approved by Transport Canada. By calling 1-800-265-0212 and identifying Breakaway Fuels number ERP 2-0010-434 will connect you with the dispatch center and activate the response.

7.2 Requirement for Environmental Emergency Plan

Breakaway Fuels is required to file an Environmental Emergency ("E2") Plan with Environment Canada. This plan is not required for the existing fuel oil storage operation as the threshold requirements for diesel fuel are much higher volumes than they are for propane under Environment Canada. The minimum threshold for propane under the E2 regulations is 4.5 tonnes of propane. If any operation exceeds this minimum storage capacity, an E2 Plan must be prepared and registered with Environment Canada.

This plan serves as both an RSMP for submission to the T.S.S.A. and an E2 Plan for submission to Environment Canada satisfying the requirements of both. When this location is approved by the T.S.S.A. to commence operations the E2 Plan will be submitted to Environment Canada. The RSMP/E2 Plan will be maintained in the main Breakaway Fuels office. The general public can go to the Environment Canada website and search for hazardous products found within their neighbourhood and how much is present in the area.

7.3 Breakaway Fuels Internal Emergency Response Plan

Breakaway Fuels has prepared their own Emergency Response Plan for the facility and it is presented here for review by the Town of Georgina Fire Department.

The Breakaway Fuels facility has an in-house Fire Safety Plan that all employees are required to read and sign off. The Emergency Response & Preparedness Plan for the Breakaway Fuels facility is presented here for review by the Town of Georgina Fire Services and the T.S.S.A.

EMERGENCY RESPONSE PLAN
Breakaway Fuels
8307 Old Homestead Road
Pefferlaw, Ontario

In case of any emergency, staff and customers will be informed by the Owner or the Office Administrator or driver an incident has occurred at the propane tank and filling area. In the event of a fire or propane leak it will be reported immediately to Russell Howes or designate at the Administration Office. He will call the appropriate authorities at 9-1-1. If it is deemed the facility must be evacuated, the Owner will inform all staff and customers to leave the building and yard and proceed to the Emergency Muster Point (EMP) located in the parking lot.

It is the responsibility of each employee to ensure safe evacuation of the visitors or customers they are dealing with. When staff and visitors leave the building and property, they will meet on the northwest corner of the site near the main entrance off of Old Homestead Road.

Russell Howes will be responsible to ensure all yard staff are informed of the emergency and evacuation takes place and directs them to the meeting location. Before leaving the Administration building he will also ensure the emergency shut off for the propane tank located at the electrical panel (inside quanset hut) is activated.

Upon leaving the Office he will ensure that there are no people remaining in the area and the visitors log book is retrieved and taken outside. In addition, Russell Howes or Sheri Nicholson will contact any drivers on the road to inform them an incident has occurred and they should not return to the plant until directed otherwise.

Russell Howes will be responsible to inform the business immediately west of the propane operation that an incident has occurred and if they are conducting any activities at their business involving sources of ignition, this activity should be halted immediately must be halted for safety reasons.

EMERGENCY NUMBERS

FIRE, POLICE AND AMBULANCE	**9-1-1**
BREAKAWAY FUELS	**1-800-363-7567**
PROPANE ERAP PLAN (EPR 2-0010-434)	**1-800-265-0212**
SOUTHLAKE REGIONAL HEALTH CENTRE	**905-895-4521**
TSSA (Don Heyworth - local inspector)	**226-448-2218**
TSSA	**887-682-8772**
Ministry of Labour	**1-800-461-4383**
Spills Action Centre (Ministry of Environment,	**416-325-3000**
Energy & Climate Change)	**1-800-268-6060**
CANUTEC	**613-996-6666 (*666 by cell)**

The purpose of this Emergency Response & Preparedness Plan is to contain and control incidents related to the release of propane to minimize the consequences to the employees and visitors to the Breakaway Fuels facility. It outlines the responsibilities for the employees and persons in charge of implementing the "Internal Plan" within the facility to safely evacuate personnel away from the potential hazard and also to coordinate efforts and information with the outside

Emergency Responders in order to inform them of the potential hazards and what mitigation measures are available to reduce the risk.

Internal Plan

The personnel within the Breakaway Fuels plant responsible for coordinating the implementation of this ER&PP are found on the attached Emergency Phone List.

An Internal Safety Fire Plan is posted inside the facility and is to be reviewed by all staff. If copy of this Plan is required by the Town of Georgina Fire Services one can be made available to them as requested.

The main Emergency Coordinators for Breakaway Fuels are:

Russell Howes - Owner
Mike Lance - Assistant Manager
Sheri Nicholson - Office Administrator

Propane Hazard Mitigation Steps

In the event of a propane leak or fire, the attached 'Facility Emergency Management Procedures for Propane Incidents' must be followed. This procedure is reviewed with every new Breakaway Fuels employees as part of every safety meeting. These plans are understood by all personnel associated with the filling or handling of propane equipment.

After Hours

In the event an Emergency occurs after 5:00 PM when the facility is closed and unmanned, a call to Russell Howes can be made and he can respond to the site in 10 minutes.

Fire Department access can be made by using bolt cutters after hours as the front gate and gate to the propane storage area will be locked with a lock and chain. This arrangement is acceptable to Breakaway Fuels.

Russell Howes - Propane Plan Coordinator

Roles & Responsibilities

1. **Sets Emergency Procedures in Motion**
    a. Upon noticing an incident or being informed of one, would ensure the evacuation would start.

2. **Delegates roles**
    a. Upon noticing an incident or being informed of a potential threat will ensure people are made aware of the potential danger and ensure all persons in the area (office and yard) were moving towards the exits in an orderly fashion.

3. **Coordinates on site mitigation**
    a. Directs persons with Records of Training (ROT) in propane to the incident area and shut off the supply of propane if it is safe to do so.

4. **Ensures 9-1-1 has been called**

5. **If not on site, responds to the site as soon as possible**
    a. A typical response time from Russell Howes residence to the plant is approximately 10 minutes.

6. **Sets up command post of the initial evacuation point**
    a. Ensures that an accurate head count has been performed and all persons are accounted for. If all persons are not accounted for he will be prepared to advise External Emergency Responders the last known location of the person(s).
    b. If situation appears to be serious or is escalating:
        i. Make inventory data readily available when Emergency responders arrive.
        ii. Enact ERAP plan if required to provide additional resources of propane technicians and propane handling equipment.
        iii. Ensure that staff ROT holders with knowledge of propane characteristics are available as a source of information.
        iv. Contact nearest neighbours by going to the buildings and advise them there has been an incident and have their staff or families evacuate to a distance of at least 600 meters away.
    c. Coordinate all on-site and off-site migratory actions.

7. **When Emergency Responders arrive provide relevant information on:**
    a. Status of persons that were on site. (ie: Is everyone accounted for or are there still people on the site).
    b. Inventory amounts.
    c. Who from ERAP has been contacted and what is their expected arrival time.
    d. Ensures that staff persons with propane knowledge remains at the secondary muster point as a resource.
    e. Liaison with Emergency Responders to enact the External Emergency Plan. **If required by the Town of Georgina**.
    f. Liaison with the Emergency Incident Commander or any other designate of the Town of Georgina emergency responders, to provide relevant information in what behavior the public should adopt if required to evacuate.

Mike Lance - Assistant Propane Plan Coordinator

Roles & Responsibilities

1. **Contacts 9-1-1 and informs staff and visitors**
    a. If the owner is not on site during an incident, the Assistant Propane Plan Coordinator will make the call to 9-1-l and then insure staff are aware of the situation and have them start evacuation measures.

2. **Contacts Drivers and Owner who are away from plant**
    a. If incident is serious, will contact drivers who are out delivering product that an incident has occurred at the site and they are not to return to the plant until notified to do so. This includes the fuel oil and propane delivery drivers.
    b. Contacts Owner (if not on site) to inform him of the situation and then ensure all persons in the area (office and yard) were moving towards the exits in an orderly fashion.

3. **Coordinates on site mitigation**
    a. Directs persons with Records of Training (ROT) in propane to the incident area and shut off the supply of propane if it is safe to do so.
    b. Takes log book to Muster Point to insure all staff and visitors are accounted for and to provide information to the Emergency Responders upon their arrival.

Site Plan Drawing for Fire Plan

The Facility Site Plan shows the location of the propane facility at 8307 Old Homestead Road and also the Fire Services access route that is to be unrestricted at all times. The meeting point for all employees and visitors is also identified and it is the responsibility of the employees or Owner to take the list of employees and guests with them in the event of an emergency and bring it to the meeting place to insure all staff and visitors are accounted for. This information must be relayed to the Town of Georgina Fire Emergency Responders after verification.

External Plan Contact

The individual who will liaise with the responding Incident Commander in the event of a Propane Incident will be Russell Howes.

Russell Howes will be responsible for any contact with the media in the event they come to the site. Any release of information regarding the Breakaway Fuels operation will only be through Russell Howes.

BREAKAWAY FUELS AFTER HOURS EMERGENCY CONTACT LIST

Name	Home Phone Number	Cell Phone Number
Russell Howes	(705) 513-1400	(905) 953-6620
Michael Lance	N/A	(905) 953-6418
Sheri Nicholson	N/A	(905) 953-6417

Emergency Preparedness Steps

1) Warn all personnel and visitors at the plant they are to evacuate the Administration building and fuel storage yard using only the north exit gate (See Facility Site Plan) if inside the plant and head toward the "Muster Point" toward the entrance on Old Homestead Road.
2) Ask all operators of equipment and vehicles to turn off the machines and secure them before leaving their position.
3) Assemble on the northwest side of the prope1ty outside the gate adjacent to the Administration building.
4) If anyone is missing, ask the people assembled whether they saw the individual(s) who is/are missing and when and where they were seen last.
5) Provide this information to the Emergency Coordinator so it can be provided to the External Emergency Responders.
6) Once the External Emergency Responders arrive, the Coordinator must provide them with the location and nature of the emergency. This includes any information related to the propane storage tanks and cylinder storage area.

7) Provide a sketch of the site indicating the location of the fire extinguishers and how access to the tank and yard can be made.
8) MSDS sheets are available, provide this information to the Emergency personnel if requested to do so.
9) Once all persons are accounted for wait for clearance from the Emergency Coordinator before leaving or returning to the office/yard.

All employees should be familiar with the ER&PP. It should be reviewed once a year and the attached list should be signed off after review. This Plan should be updated whenever there are changes to the facility or procedures associated with the Breakaway Fuels facility. This forms part of the Management of Change (MOC) that should be implemented for this site.

External Plan

As per the requirements under the 0. Reg 440/08 this plan is to be submitted to the local Fire Authorities for their review and approval as stated under the Regulations:

27.1(1)
"The director shall not consider an application for a license for a retail outlet, filling plant, card lock/key lock, private outlet or container refill centre or an application for an expansion of one, unless it is unaccompanied by an approval from the fire service responsible for the area where the referenced facility is located."

27.1(2)
"The approval of the fire service shall indicate that the fire service has approved all components of the risk and safety plan that address fire safety, fire protection and emergency preparedness. "

The External Plan will be at the discretion of the Town of Georgina and Emergency Services. The decisions to:

1) Name the persons authorized to set Emergency Procedures in motion and authorize people to take charge.
2) Evacuate the surrounding area.
3) Arrangements for off-site mitigation action.
4) Utilize either Breakaway Fuels personnel or the Canadian Propane Association (CPA)/ Emergency Response Assistance Canada (ERAC) response team.
5) Arrangement for on-site mitigation action.

Plausible Emergency Situations for Breakaway Fuels Pefferlaw Propane Filling Plant

Purpose: The following information presents a possible Emergency Situation that could occur at the Breakaway Fuels - Pefferlaw facility. It should be understood that these "potential" incidents are hypothetical only and represent a major incident and a minor incident. The safety features at the Breakaway Fuels site will severely restrict a major incident from occurring since a fire needs three major inputs to be sustained:

The fuel in this case is propane. In order to sustain a fire, all three components must be present. The use of internal valves and other pneumatically controlled equipment installed at the Breakaway Fuels site will severely restrict any fuel spills so the component of the triangle above will be severely curtailed.

Scenario #1 **WORST CASE SCENARIO**

At approximately 8:00 PM a call is received from the fire department saying that the main storage tanks at your facility is involved in an uncontrolled fire. This information is then dispatched to Russell Howes or Mike Lance contacts the fire department to find out more information and to inform them she(he) is on the way to the facility. The company responder is informed that the pressure relief valves on the tank are relieving and that an evacuation based on the National Emergency Response Guidebook for up to 800 metres has been ordered. The company responder is requested to meet with the fire department outside the hazard zone at the command centre to discuss what steps need to be taken.

Once on site, it is determined in conjunction with the company responder and the fire department the best course of action is to maintain a steady water stream on top of the tank to keep the steel cool to avoid metal fatigue.

If the tank and other areas like the trucks are kept cool there will be no chance of a BLEVE from the tank. If no remediation is possible and the scene must be totally evacuated, the fire department will have to pull back and within 30 minutes the propane storage tank BLEVE's. Due to the decision to do a total evacuation of the area no one was injured, but some buildings may have some minor damage.

Scenario #2 **ALTERNATE SCENARIO**

During the cargoliner unloading procedure, the hose ruptures releasing propane. The resulting release of propane from the 2 inch hose migrated outside the facility property without finding an ignition source. The emergency shut-down system built into the facility was activated by the driver which immediately stopped the release of propane. Due to the inherent safety features built into the facility no evacuation was required;

This could have been a very serious incident had no safety system been installed or it was not maintained properly and tested on a regular basis. On a facility without an emergency shut-down system this would have required total evacuation of the facility up to 200 metres due to a flash fire hazard and if an ignition source was found, a hazard evacuation to 200 m would be needed. This would have resulted in the total loss of product from the facility with potential heat damage to tank and related piping.

The decision to set up a Command Post or safety perimeter is up to the Emergency Responders from the Town of Georgina. The Breakaway Fuels staff do not have the necessary qualifications or training to address these items. For this reason, the only responsibilities of the Breakaway Fuels personnel are:

a. Contact emergency services and give details of incident by designated person as per Breakaway Fuels Emergency Response Plan.
b. Evacuate property of all employees and visitors as per Breakaway Fuels Emergency Response Plan.
c. Account for all employees and visitors as per Breakaway Fuels Emergency Response Plan
d. Work with the External Responders to inform them of all potential risks and hazards and to insure information relayed to outside persons is accurate and current.

Handling of Media

Under no circumstances should any employee talk to allow themselves to be interviewed by the media. All questions directed to the staff must be answered with a "NO COMMENT" or the individual should be referred to the Propane Plan Coordinator if on site.

Do not direct outside people on what they should be doing or what hospitals to go to etc. This is the responsibility of the Town of Georgina Emergency Services personnel or the local Police Services personnel and they are responsible for evacuation and mitigation processes.

7.3.1 Scope/Application

The On-Site Emergency Plan prepared by Breakaway Fuels also includes situations where the handling of propane fuel other than the filling of the main storage tank takes place. These include the following possible scenarios and where the responses are found.

1. Non-Flammable Compressed Gases — Appendix R
2. Lockout Procedures — Appendix R

7.4 External Emergency Plans (ERAP)

The external Emergency Plan for this facility is based on the Emergency Response Assistance Plan (ERAP). The purpose of this Plan is to provide mutual assistance in the form of trained and equipped persons to assist at emergencies involving LPG that is stored, sold, used or transported by participants in the Plan, in order to protect and minimize the risk to people, the environment and property.

Breakaway Fuels transports propane so they are required to have an ERAP as the limit is if you transport more than 3000 litres on a truck an ERAP is required. Breakaway Fuels does have this limit and as a result, do have a ERAP and a typical ERAP Plan is attached (for Reference only) in Appendix "J" and can be used by the Breakaway Fuels operation.

7.5 First Responders

7.5.1 Municipal Fire Fighting

The First Responders to the Breakaway Fuels plant on Old Homestead Road will be the Town of Georgina Fire Department. The Town of Georgina Fire Depa1tment has provided a OFM Phase I form indicating what the capabilities of the Fire Department are. This is found in Appendix"I".

The response time for the Fire Department to the Breakaway Fuels facility is approximately 6 minutes for volunteers and the closest station is about 6 kilometers away from the site. The set up time for the Fire Department to get a full complement of crews is between 10 to 15 minutes depending on the situation and assistance requested. The first alarm would consist of two pumper trucks and the use of a Master Stream of 30 m (100') reach. Approximately anywhere from 6 to 8 firefighters would respond to this site in the event of a 9-1-1 call. There are no hydrants located along Old Homestead Road.

7.5.2 Flowrate for Propane Fire Main Tank

According to the NFPA document, "Fire Safety Analysis Manual for LP-Gas Storage Facilities" the flowrate and total water volume required to cool containers exposed to a fire are outlined in their Form 8.3 attached. Based on the calculations, the storage tank at the Breakaway Fuels facility has a total surface area of approximately 175 m^2 (1,884 ft^2).

According to the NFPA document, the area of a typical 30,000 USWG tank is 1,610 ft^2. The recommended flowrate for keeping a tank with this surface area is 201.3 gpm based on Form 8.3 as only half the tank surface has to be kept cool.

The 25,383 USWG tank that is in service at Breakaway Fuels has a surface area of 1,884 ft^2. To extrapolate a flowrate for this surface area from Form 8.3 in Appendix L, the recommended flowrate required to keep this 25,383 USWG tank with this surface areas is 890 lpm (235 gpm).

Since there are no hydrants on Old Homestead Road, the water supply can come from three sources for this site. Breakaway has a large 10,000 gallon underground water on their property that is accessible to the fire services at all times as it is located in front of the Administration building (See Facility Site Plan drawing, Appendix "H").

There is also a pond within the storage yard area that is accessible to fire services if this is an option the emergency responders would consider. (See Facility Site Plan). The Town of Georgina also has two (2) tankers (T184 & T164) that are readily available to bring to the site. In addition, there are outside resources for two (2) more tankers in the region but these are stationed a fairly long distance from the site according to the Town of Georgina Fire Services.

Using the 10,000 gallon underground water tank on site will provide sufficient time for the tankers to get to the site while the pumpers are using the water from the underground tank on site. The pumpers are capable of pumping 1050 gpm so this would allow almost ten minutes of supply while the departments tankers arrived. This flowrate is well over the 890 lpm (235 gpm) needed to keep the tank cool so the amount of time the underground tank is used would be a lot longer, thus allowing the department to set up the tankers.

This also provides ample water for cooling any cylinders that may be within the heal flux area near the lank as the master stream from the Town of Georgina Fire Services should be at least 46 m (150').

According to information provided by the Town of Georgina Fire Department, the maximum water supply flow rate that can be achieved at the site is 3,975 l/min (1,050 gpm). As explained below the required flow rate is 725 gpm, well below this maximum flow rate. Therefore the anticipated flow, even if not sustained at the maximum rate will be more than enough to keep the main storage tank cool regardless of what pumpers are available, and have enough excess capacity to keep any cylinders and firefighters protected in accordance with the NFPA document.

According to the NFPA form 8.3, additional water flow is rounded up to the nearest multiple of 125 gpm if cylinders are in the yard and since the cylinder operation here is quite small, this additional flow may not be significant at this location. Form 8.3 also accounts for additional water for firefighter protection and the Town of Georgina have a good number of full time and volunteer fire fighters to call upon. Additional water for Firefighter protection on NFPA Form 8.3 states (if required), one should allow for an additional 125 gpm for this protection. If additional water is considered necessary for container protection the nearest multiple rounded up from 235 gpm is 375 gpm. This is achievable with the water supply at this location.

If firefighter protection is considered necessary, an additional 250 gpm would be factored in and this would take the required flow to 725 gpm. This is achievable by the pumping capacity available to the Town of Georgina and since this water is available it will substantially reduce the risk of a BLEVE at this site.

A complete loss of product from the tanks would be highly unlikely but a leak from a hose could occur during tank filling and this would be the largest leak at this site. Based on the NFPA document “Fire Safety Analysis Manual for LP Gas Storage Facilities” a leak from a 2” hose would be 81 gpm (See Table 7.1 Model #2b Appendix "L"). If the 25,383 USWG tank was at its maximum volume of 85%, the amount of propane involved would be 21,575 USWG. If a rupture were to occur it would take 4.5 hours to empty the vessel in a worse case situation.

It is obvious the firefighters would isolate the tank and this time would be much less but this is just a theoretical capacity and assumes the ISC valves don't close and the back check valve fails to operate. These are both highly unlikely events. The capability of the Town of Georgina Fire Department has been provided in Appendix "I" in the OFM Phase I form.

7.5.3 Medical Aid

Medical Aid within the Town of Georgina is through the Emergency Medical Services. The Town is well equipped to respond to a medical situation in a timely manner in order to assist with any treatments associated with an incident. The nearest hospital is in Newmarket at the Southlake Regional Health Centre.

7.5.4 Municipal Emergency Response Plan

The Town of Georgina has adequate resources to attend to any Emergency at this facility. A staff complement is presented in Appendix"I" where the OFM Phase I form is found. The Town has their own Emergency Response Plan that can be implemented by the towns trained personnel.

A copy of this Plan has been presented in Appendix "Q" and AltEng Inc./Sleegers has reviewed its contents and confirm that it is far more thorough and detailed than any External Plan that could be prepared by us. For this reason, AltEng Inc./Sleegers is endorsing this Plan as the official External Plan for any incident that may occur at the Breakaway Fuels facility. The Emergency Responders such as the Police Services and Fire Services will establish the protocol for securing the surrounding area and directing any evacuations (if needed), from an established Command Post.

The ERAP Plan for Breakaway Fuels will also be used if enacted and this will form part of the overall Emergency procedures used at this site. The propane specialists called under the ERAP will provide assistance and technical advice to the Emergency Responders with regard to the types of equipment that is used with propane and any potential hazards or mitigation controls that could be used to battle the particular event taking place here.

7.6 Water Run-off from the Facility

The facility at Breakaway Fuels is not connected to any municipal storm system. The terrain around the propane tanks is higher than the surrounding area to the south and the slope is to the south where the water will tend to flow and also slightly to the east toward the low lying areas here. This will provide adequate water run-off in the event of an emergency at this facility as the edges of the property are heavily grassed with vegetation along the back and east and west sides so water will flow away from the propane tank towards these areas or soak into the gravel or ground surface. There are no catch basins in the yard to capture water from around the tank.

For this reason and the fact the ground around the tanks is gravel, there are no immediate concerns water run-off will be impeded and the stored tanks and cylinders are in no danger of floating away from the site. The minimum water required is in the range of 235 gpm which is not sufficient enough to cause any flooding or risk of fugitive cylinders leaving the site or area.

7.7 Summary of ERPP Review

The Owners of the Breakaway Fuels facility have made extra efforts to insure the propane operation is secure and will operate safely with properly trained operators and notification systems. The immediate neighbours close to the propane facility may be informed by Breakaway Fuels management if this is deemed to be prudent.

The other aspects of the Plan are the routine checking to insure the equipment associated with the Plan is in good working order. This commitment to potentially informing the immediate neighbours plus the training of staff will provide a very safe installation for all propane transfer activities. All Code aspects regarding the B149.1-15 & B149.2-15 Codes have been reviewed and the facility is in compliance. The T.S.S.A. will conduct a final inspection before the facility is permitted to operate and since the Risk Assessment indicates the installation meets the Guidelines for acceptable risk, we feel the facility is in compliance with the new Provincial regulations and legislation.

For this reason, we believe that should an incident occur, the rational approach is to evaluate the area around the tank and then allow the tank to burn off product and keep the top cool so as not to reduce the strength of the steel and potentially causing a BLEVE.

If the ISC valves are closed this will stop any fuel from releasing from the tank and as such will cause the leak and in case of a fire, be extinguished. The nitrogen tubing connected to the ISC valves and ESV's will also melt in case of a fire and as a result, the nitrogen drop out and all pneumatically operated valves will close as these valves a held open by springs and once the force to maintain them in the open position is removed, they close automatically.

The response time for Breakaway Fuels owner to get to this site is about 10 minutes.

If a major incident does occur Mr. Russell Howes will respond to the site and he will represent Breakaway Fuels and be the main liaison with the Incident Commander and any other Fire Services/Police Services personnel.

The Facility Site Plan for the Breakaway Fuels facility is found in Appendix "H". This shows the Fire Extinguishers, ESD locations, Muster Point and proposed Fire Route for this facility.

For the Town of Georgina Fire Department, access to the site after hours will be through the main swinging gates. There will be chains on the gates that Emergency Responders can use bolt cutters on or if preferred, Breakaway Fuels can install a combination lock or a "lock box" with a key

inside along with an access code so the Town of Georgina Fire Services can retrieve the Code and gain access to the yard.

7.8 Fire Department Approval of Emergency Response Plan

This Emergency Response Plan was prepared by AltEng Inc., updated by Sleegers, and reviewed by the Town of Georgina Fire Services. This RSMP and ER&PP was submitted to the Town of Town of Georgina Fire Services prior to the new plant being licensed by the T.S.S.A.

The Fire Services did provide approval of this RSMP and specifically, the ER&PP and have approved this document noted in Appendix "P" of this RSMP. This approval was based on a letter issued and approval by the Town of Georgina Fire Chief, on October 18, 2019.