

Reply to CEAEC's comments on Bulk Guidelines Revision 9 sent to ERD on September 11, 2023

The Explosives Regulatory Division (ERD) thanks the Canadian Explosives Industry Association (CEAEC) for the review and comments on revision 9 of ERD's Guidelines for Bulk Explosives Facilities.

The following is ERD's response to comments and questions received from CEAEC on September 11, 2023.

1. Regulatory references - Thank you for the positive comment.
2. Section 1.2 - This guideline is only for Division 1 bulk explosives facilities. The regulatory requirements for Division 2 are very different (much less stringent). ERD will develop a separate guideline for Division 2 facilities in the future.
3. Section 1.3 - The standards are already listed.
4. Section 2.2 – The equipment using fuel will remain at 25 m, as the rationale does not show the risk justification for having the equipment at 6 m.
5. Section 1.2 - ANFO manufacturing certificates licensed as Division 1 are included in these guidelines. Division 2 manufacturing licences and certificates are going to be covered by a separate guideline for Division 2 facilities, subject to potential package 2 modifications to Division 2.
6. Section 2.2
 - a) Heels do aggregate in accordance with the QD standard, for external QD considerations. The section was updated to clarify this.
 - b) Measurements are done from all the PES (including from MPUs with heel to external ES). Follow the rules in the QD Standard.
7. Section 2.3 – ERD has updated the language to correct the typo.
8. Section 3.2 – ERD has updated language from: "MPU decontamination would not be licensed at a site with limited washing facilities." To "MPU decontamination would not be permitted and would not be licensed at a site with limited washing facilities."
9. Section 3.2 - Please describe how the ANFO vehicles will be maintained and decontaminated on site.
10. Section 3.3 - The interpretation of "temporary" being six months has been used by NRCAN for several years. We don't see a justification to change the interpretation to eight months.
11. Section 4.4.1 - The use of "fire-resistant fabric" buildings would normally not be licensed for buildings with explosives as they are combustible. These buildings could be licensed in certain unique scenarios where non-combustible structures are not feasible and justification is provided as part of the licence application.
12. Section 4.5.1 - Sill requirements: ERD is looking into it.
13. Section 4.5.2 – ERD has updated the language from: "Wastewater and scrap explosives should be collected and disposed of in a manner approved by the provincial or other responsible environmental authority." to: "Wastewater and scrap explosives should be collected and disposed of in a manner that meets any applicable provincial, territorial, or other responsible environmental authority."
14. Section 4.6 – Change made. Zone 2 and Division 2 are the same. Division 1 comprises Zone 0 and Zone 1.
15. Section 4.5.4 & 4.6.7 - Sill requirements: as per item #12, ERD is looking into it. Similarly, ERD is looking into requirement for the 5 cm raised curb along the wall.
16. Section 4.7 – The 2,000 kg aligns with rationale of s.198(1).

17. Section 4.7 - Please provide a risk analysis on how pre-loading MPUs with explosives ahead of time provides better safety and security outcomes.
18. Section 4.8 – ERD has updated the section to say that heated water/glycol jackets are not considered double-walled if they are designed, constructed and installed to conform to good engineering practices and constructed in a manner that prevents the accumulation of explosives or raw material in cracks and cavities and that minimizes the harm to people and property that could result from an ignition of the explosives or raw material.
19. Section 4.8.2 - To section was updated by adding: “or the unit is immobilized (e.g. with the air access locked).
20. Section 4.13 – ERD has updated the language from: “Gasoline or propane powered equipment should be forbidden inside a building with explosives.” to “Gasoline or propane powered equipment would typically not be permitted and licensed inside a building with explosives.”
21. Appendix A – The appendix was updated to include TEFC motors. Heaters need to be suitable for the environment, as well as Class 1 Zone 2.
22. Appendix A – The appendix was updated to say that LIGHTING is EEMAC 4X when there is no combustible dust present and Class 2, Zone 2 when there is combustible dust present.

We look forward to any additional comments you may have and are happy to meet to discuss any concerns.