

### What is HAZMAT?

HAZMAT

### Lifecycle Management

- Lifecycle Management
- Lifecycle Managers
- Reducing Hazards
- Reducing Quantities

### Due Diligence

- Due Diligence
- Standard of Care
- Types of Offences
- Degree of Care
- How to Promote Due Diligence

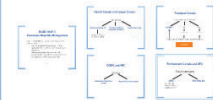
## Terms and Concepts



### Role of a UHMC



### Policies and Legislation



## Role of a UHMC

- Advise on selection of HAZMAT
- Advise on procurement of HAZMAT
- Advise on reception of HAZMAT
- Advise on use of HAZMAT
- Advise on handling of HAZMAT
- Advise on storage of HAZMAT

## **Role of a UHMC (cont.)**

- Advise on transport of HAZMAT
- Advise on issue of HAZMAT
- Advise on disposal of HAZMAT through local disposal system
- Maintain Unit HAZMAT inventory
- Maintain SDS
- Inspect HAZMAT storage and use areas

## **Role of a UHMC (cont.)**

- Adhere to procedures, plans and programs
- Maintain Unit HAZMAT procedures
- Participate in audits, reviews, verifications
- Promote HAZMAT awareness
- Coordinate spill response
- Liaise with Base HAZMAT Officer

# What is HAZMAT?



HAZMAT is any material that, if handled improperly, can endanger human health and well-being of the environment or equipment

## Petroleum Products



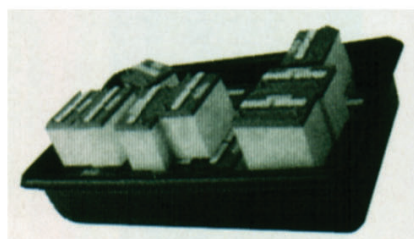
## Aerosol and Compressed Gas Products



## Chemical Products



## Hazardous Waste



# Lifecycle Management

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## Lifecycle Management

The control of a product from initial selection to disposal:

- Initial Selection
- Procurement
- Receipt
- Use
- Handling
- Storage
- Transportation
- Disposal

## **Lifecycle Managers**

- Life Cycle Material Managers (LCMM)
- Purchasers
- Supply personnel
- POL Handlers
- Tradesmen / users
- Safety Officers

## **Lifecycle Managers (cont.)**

- Waste contractors
- Fire protection personnel
- Spill responders
- Environment Officers
- HAZMAT Coordinators

## **Reducing Hazards will:**

- Require less or no personal protective equipment (PPE)
- Reduce liability and involvement of enforcement personnel
- Require less stringent storage requirements

## **Purchasing smaller quantities will:**

- Minimize potential for spills
- Minimize waste due to shelf life expiration
- Reduce the need for dedicated storage areas for the stock on hand



# Due Diligence

- Due Diligence
- Standard of Care
- Types of Offences
- Degree of Care
- How to Promote Due Diligence

## Due Diligence

Due diligence is the reasonable standard of care for the environment and for the health and safety of others that individuals shall exercise in the course of their actions and duties

## Standard of Care

As a minimum, individuals must:

- know and obey applicable HAZMAT laws, regulations, by-laws, guidelines and adhere to the 'customs of trade'
- prepare for risks that a thoughtful and reasonable person would foresee
- respond to accidents and incidents as soon as practicable

## Types of Offences

- Absolute Liability (e.g. parking):
  - if all elements are proven - a conviction results
- Strict Liability (e.g. HAZMAT, environmental):
  - if all elements are proven - a conviction results unless defendant can establish due diligence
- Mens rea or true criminal offences:
  - if all elements are proven AND criminal intent is proven - a conviction results.

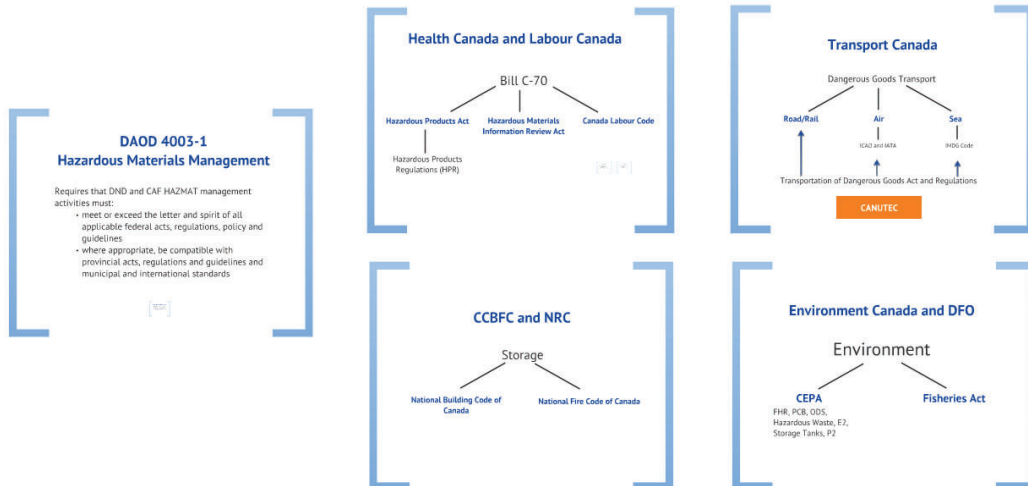
## **Degree of Care**

- Gravity of potential harm
- Reasonable alternatives available
- Knowledge and skill of personnel carrying out the activity

## **How to promote due diligence**

- Awareness through training
- Monitor and evaluate the HAZMAT plan
- Integrate HAZMAT policies into planning
- Conduct audits, inspections and assessments
- Documentation and records
- Posting of HAZMAT and PPE Storage locations
- Surprise but supervised spills
- Annual Environment Day
- HAZMAT orientation upon new posting
- NOT through email

# Policies and Legislation



## DAOD 4003-1 Hazardous Materials Management

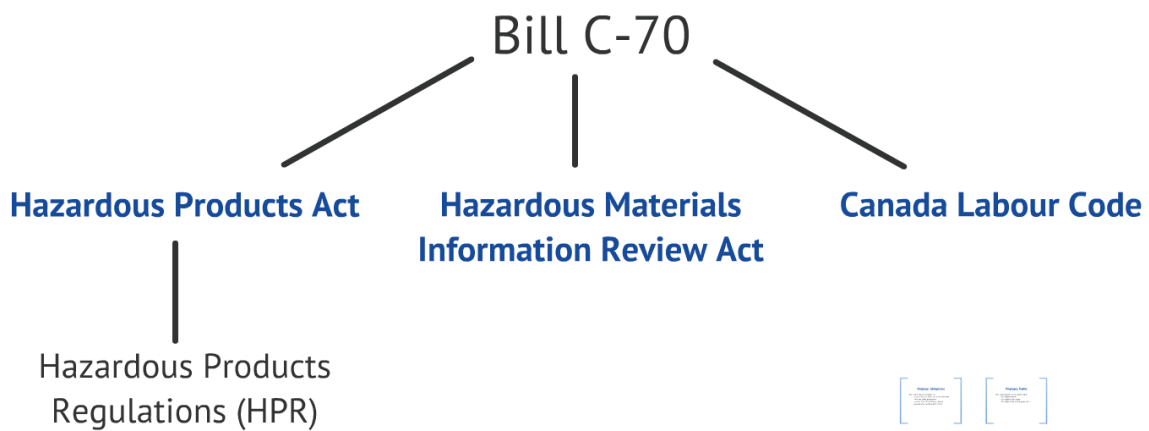
Requires that DND and CAF HAZMAT management activities must:

- meet or exceed the letter and spirit of all applicable federal acts, regulations, policy and guidelines
- where appropriate, be compatible with provincial acts, regulations and guidelines and municipal and international standards

## DAOD 4003-1: Prime Directive

- HAZMAT lifecycle management shall protect human health, the environment and equipment; while meeting legal requirements
- Due diligence shall be exercised in carrying out those duties and responsibilities

## Health Canada and Labour Canada



## **Employer Obligations**

CLC, Part II requires employers to:

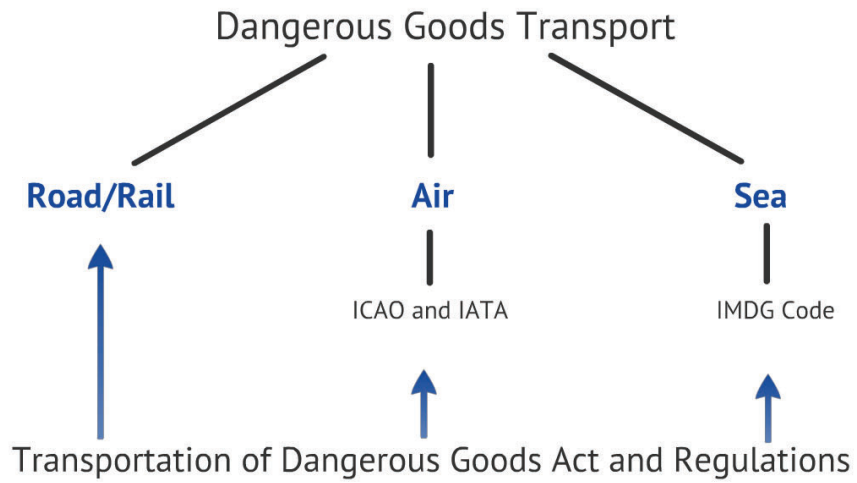
- ensure that employees are fully conversant with the safety precautions
- ensure materials are clearly labeled
- provide easy access to data sheets

## **Employee Rights**

CLC, Part II establishes employee rights:

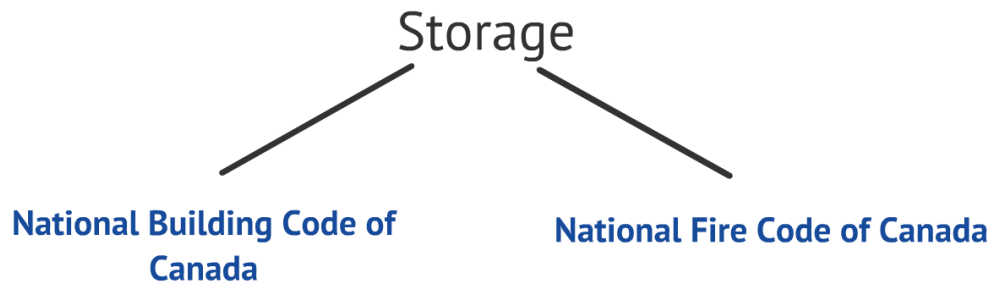
- The Right to Know
- The Right to Participate
- The Right to Refuse Dangerous Work

# Transport Canada



CANUTEC

# CCBFC and NRC



# Environment Canada and DFO

## Environment

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graph TD; Environment --> CEPA; Environment --> FisheriesAct[Fisheries Act]; CEPA --- CEPAList["FHR, PCB, ODS, Hazardous Waste, E2, Storage Tanks, P2"];
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### **CEPA**

FHR, PCB, ODS,  
Hazardous Waste, E2,  
Storage Tanks, P2

### **Fisheries Act**