

## Neudorf, Leley

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**Subject:** Your submission has been received - #070502

-----Original Message-----

From: WorkSafeBC [mailto:prevweb@worksafebc.com]  
Sent: Wednesday, June 06, 2007 10:57 AM  
To: troy.davies@lafarge-na.com  
Subject: Your submission has been received - #070502

Your submission has been received.

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Submission ID: P09.NG6.1T2.V5S

Part 4: General Conditions, relating to fills, stockpiles, terrain stability and avalanche assessments

1. Name: Troy Davies

- (a) Feedback is provided: on behalf of  
Organization: Lafarge canada Inc. Job Title: Safety Coordinator
- (b) Feedback is provided: from an employer's perspective

2. E-mail: troy.davies@lafarge-na.com

3. Feedback:

Section #:20.14.2

Comments: There is limited general support for this Regulation, with some explanation of the intent needed during our review. When reading just the regulation, it was perceived that we would need to have a professional engineer or geoscientist on the payroll with the amount of operations we have in which heavy equipment travels onto stockpiles. The guidelines explain the use of generic procedures where the materials are substantially the same. Regardless of the consistency of the materials, the stability of a stockpile will continually be affected, and not necessarily by the movement of equipment on top of them. Every time materials are added or removed, the pile is changed. Weather conditions will continue to affect stockpiles. How will prevention officers enforce this? There is concern this regulation is designed for the Prevention Division to reference 'after the incident', when proposing a penalty or additional assessment.

The guidelines also discuss the need for proper design of a structure used to retain a stockpile. There would be need for a professional engineer to provide documentation with respect to the stability of the structure, but i do not see any reference to size or height. What if the structure consists of lock blocks set two high? I am guessing this would have to be determined by the materials being retained, size or type of equipment, etc. There must be some application of practicability in the need for the documentation, taking into regard the size of the structures. Is there a history of failures or incidents the Board is looking to address?

One view of a stakeholder is that the need for additional involvement from professional engineers or geoscientists may be construed as a use of legislation to 'line the pockets' of those professions.

Although we personally do not believe this, it is important to note the sudden amount of involvement as a result of these proposed regulations.

4. Please indicate your level of support of the proposed amendments:generally disagree

5. If you agree or disagree with the proposed amendments, please provide reason(s):

Section #:20.14.2

Comments: We do not have a history of incidents involving equipment or workers arising from stockpile failure. There are more variables affecting stockpiles than just equipment or the stability of the structures used to support the toe of the pile. The piles change from day to day, and are subject to variable weather conditions. Professional engineers can provide documentation today, but there would be a very different scenario the next day, possibly before the documents are provided. We do not see how their involvement can influence the safety surrounding an ever-changing subject. We agree that the procedures for placement or removal from stockpiles is necessary, but not the involvement of professional engineers or geoscientists.