Purpose
This document is intended to be used by staff working in the Peace-Liard Business Area as additional guidance for interim preworks with licensees who re-enter a TSL to burn slash piles. Several incidents have been documented whereby potential non-compliances occur due to shortfalls in emergency preparedness for fires as well as a lack of awareness around fire weather, burning conditions and venting indices. It is expected that a great deal of emphasis will also be placed on this issue at initial TSL preworks therefore this guidance is intended to be used to enhance this conversation and communication as well.

Procedures

Preparation
1. PLBA staff that oversee Timber Sale Licenses should proactively be communicating with Licensees to determine when the Licensee will return to a Timber Sale to burn debris piles. PLBA staff should notify the Licensee that an additional prework is required to focus on issues related to burning.
2. Additional burning preworks may be conducted verbally between staff and the licensee or in person, both methods require subsequent documentation that the prework was conducted (refer to documentation section)
3. Ensure that for any Scale Based TSL’s, the waste survey has been completed prior to burning.
4. If burning near the public interface, have local officials/ stakeholders been notified ( i.e. fire departments, emergency 911 )
5. Wildfire Services issues a separate Burning Reference Number for every TSL. You can conduct one prework for multiple TSL’s so long as the same personnel are doing the field work.

Content
At a minimum, elements 416, 801-803, 805, 807 and 903-907, 1201 from the EMS Harvesting Prework Checklist (CHK-003) must be re-emphasized.

416 – Smoke Venting Index
Guide the licensee to look up the venting index and obtain a burn reference number. Venting indexes for BC can easily be found by searching “BC Venting Index” on Google or clicking the following link;
http://www.env.gov.bc.ca/epd/bcairquality/readings/ventilation-index.html
The venting index must be “Good” on the day of light up and “Good” or “Fair” following day. Variations from this result in an EMS Incident as a potential regulatory Non-Compliance.

1) Unless otherwise specified for smoke management purposes in a Ministry of Forests burning permit or in a burn plan approved by the Ministry of Forests, open burning of debris must not be initiated unless the ventilation index is forecast as:
   a) “good” for the day the open burning is to be started, and
   b) “good” or “fair” on the second day the debris is anticipated to release smoke.

801 – Environmental Emergency Response Plan
The licensee must be reminded that the eERP must be on-site when burning. Review emergency response requirements from the eERP for the site. Page 10 of this plan discusses the requirement for completion of Fire Hazard Assessments. There is also a requirement to inspect piles and ensure they are extinguished by the date specified on the Burning Permit. The permit holder needs to apply for an extension if the piles are not extinguished by the expiry date of the Burning Permit (burning reference number). The ERP may need to be revised as often the key contact personnel for a burning crew are different than the logging crew.
802 – Roles and Responsibilities
Discuss EFP-02 with the licensee

803 – Incident/Event Procedures
Discussion on incident definitions and incident reporting procedures, CHK-009

805 – Emergency Response Equipment
Review the need to have fire suppression equipment available. Aldo, discuss the need for spill kits if fuel is on-site.

807 – Danger Rating
Licensees must be aware of the fire danger rating when burning and reminded to have available any additional precautions as a result of increasing fire danger ratings. The Wildfire Service does not maintain their weather stations in the winter so there is no Danger Rating available when most burning occurs. The burning crew must take into consideration factors such as snow depth, wind speed and direction, adjacent fuels, and the weather forecast when deciding to start burning debris piles.

903 – Project Plan
When undertaking any activities on-site, licensees must have the appropriate project plan documentation; this includes the Timber Sale License as this document is what authorizes the Licensee to perform any work on the site.

904 – Training Records
EMS Table 008-1A must be on-site and up to date. The training records may need to be updated to include the burning crew. All members of the burning crew must have S100

905 – Industrial Waste
Provide a reminder that all industrial waste must be removed from the site.

906 – Fuel Handling
Discussion on EFP-06; Ask if any fuel will be on-site, if so, discuss the fuel handling requirements for the applicable container size along with spill kit requirements.

907 – Other EFP’s
Consideration should be given to discussing EFP-01 (General) and EFP-05 (Harvesting)

1201 – Designated Supervisor
Designated Supervisor directing workers discussed. The onsite supervisor of the burning crew must have their BCTS EMS Awareness Training Certificate
Documentation

All interim preworks must be documented. As is the case with our TSL preworks, key personnel need to be part of the prework. Best practices would ensure that the licensee and the burning supervisor attend the prework. The burning supervisor needs to ensure he does a prework with the burning crew and that they sign off the prework document. A new prework report on Cengea Resources Certification is not required or recommended. Rather, the acceptable process is to reopen the last prework report that was saved in the system and add a dated comment in the comments section of the sign off tab.

This comment must include the date, what elements were discussed, who you spoke with and as much additional detail as possible.

Ensure that the licensee is provided with a copy of the revised prework document.

SAMPLE

Slash Pile Extinguished Declaration Form: the licensee must submit this declaration form within 14 days of the burning permit expiring. This form must be submitted as part of the confirmation of completion of all outstanding obligations necessary to release their security deposits (45-D). This form should be included in the EMS binder provided to the licensee at the initial prework. **As this is a new obligation, it should be discussed at both the initial prework and at the burning prework.**