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Dear Mr. Tom Rakocevic

My name is Randy J Purves, I am the educator & trainer of young minds, along with being a representative on the Technical Standards & Safety Authority (TSSA) Operating Engineers Advisory Council (OEAC). I am also a resident of Bruce County and have been working in the field for over 25 years and over the last few years as a Chief Engineer.

I am writing to you today to express my concern's that TSSA is being forced by the Ministry of Government & Consumer Services (MGCS) to push through what is known as an alternate rule called Path 2.

I believe this is a result of the provincial government passing Bill 66 "Restoring Ontario's Competitiveness Act, 2018" in which the TSSA Act is now being amended to include "Alternate Rules". Attached to this letter is a timeline and explanation of events leading up to where we are presently. Is it fair to say we were being misled at the original intent of Bill 66. That intent was to make Ontario Regulation 219/01 – Operating Engineers Regulation easier to follow and modernize it. Not to eventually eliminate the regulation.

However, my primary concern is path 2. This path essentially deregulates industries that fall under Ontario Regulation 219/01 – Operating Engineers, which includes facilities that contain extremely hazardous, and potentially fatal fluids at high pressures and temperatures. You can find these plants in hospitals, schools, institutions and major industry's such as Pulp and Paper, Refinery's, and Power generation. These facilities not only utilize pressurized equipment and processes on an industrial scale and if not run by qualified personnel and maintained to high standards pose risks to the public of Ontario. An accidental steam release from any pressure vessel has an expansion rate of 1,700 times, where an accidental ammonia release has an expansion rate of 860 times with severe toxic effects. These sectors contain **1,225** steam plants, **1,210** refrigeration plants, **734** power plants, **65** compressor plants, **11** hot water Plants, and **3** Steam primer mover plants. The majority of these plants are located in a high densely populated area. Presently, under the current regulation these facilities adhere to provincial regulator to ensure Ontario is one of the safest places in the world to work and live. Presently our Colleges are facilitating in training and educating our younger workforce with the trained operators to operate these facilities to continue with Ontario's excellent safety record. So the question arises as to why is the government risking all of this? Why is the government pushing to have this implemented by this July and not taking the time to do this right?

While the regulator states that plants who apply for path 2 must maintain a safe work environment, we all know that operating costs and maintenance budgets to ensure their profit margins are maintained at a certain level to keep their investors satisfied. This can lead to disastrous results if plants are not monitored by an independent resource. A prime example, if we had routine inspections in the town of Walkerton located in the County of Bruce, the Sunrise Propane incident in Toronto, the Fernie Memorial Arena and now our long-term care homes would those incidents have occurred or be occurring now. These are only a few examples of the negative impacts that regulatory oversight can have on public safety.

TSSA has sent out a survey last year with the results that 75% of the respondents were opposed to Path 2 direction. During the last OEAC meeting in April, TSSA stated that they were sending out another survey, however, they were pursuing Path 2 regardless of the results from that survey. All members of the OEAC have expressed their opposition to the direction TSSA is taking.

One of the significant findings in the OEAC report, mentioned that the agriculture industry which is not under TSSA oversight because they are exempt under the agricultural act that there were six boiler explosions between 2015 to the mid 2017's. This was reported by one of the larger insurance group. Note that special interest groups for the agriculture industry have spent significant money over the years lobbying the government to keep this industry exempt from TSSA's oversight. One special interest group in particular, the IIAR (an international organization, based in the US) has been attempting to do the same when

it comes to Operating Engineers qualifications and experience, by lowering the standards to maintain the exemption in industry in which is currently is not under TSSA's oversight.

Another concern is that the Ministry is on record on multiple occasions stating that their vision is to have the industry no longer regulated within 10 years. As a result, all industries will be forced onto path 2.

Ontario currently follows the rest of Canada in ensuring that the personnel operating these plants such as Operating Engineers, Mechanics etc, who manage, maintain, and operate these industries are properly certified to do so in a safe & efficient manner.

Another point to consider is the country is in crisis mode some of the people effected are working longer hours and go home to school their children at night. These same people may or may not have the time to respond to this issue and give the necessary attention that it requires.

I am requesting that we extend the time line so proper feed back can be given.

Supporting Documents

<https://issuu.com/iarcondenser/docs/01condenser-nov19-digital/41>

<https://abcnews.go.com/GMA/video/killed-boiler-explosion-caught-camera-46562554>

<https://issuu.com/iarcondenser/docs/01condenser-nov19-digital/42>

<https://www.csb.gov/videos/?SID=3575>

I hope you will contact myself if you have any questions as I will be more than happy to answer them

Sincerely,

Randy J Purves

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CC: Lisa Thompson, Minister of Government & Consumer Services: Bonnie Rose, President & CEO TSSA: Andrea Horwath, Official Opposition Leader: Tom Rakocevic, Critic of Government Services & Consumer Protection: Bonnie Lysyk, Ontario Auditor General