

Chapter 3

ORGANISATIONAL RESPONSE : DECISIONS AND RESPONSIBILITIES

3.1 INTRODUCTION

The response of organisations to an emergency combines established structures and procedures with innovative actions to deal with new situations. For the purposes of this analysis, these continuous and complex interactions are divided into four phases:

- (a) Pre-Emergency Planning (before the derailment);
- (b) Emergency Response Tactics (the initial response);
- (c) Emergency Control Strategies (the longer-term management of the emergency);
- (d) Emergency Resolution (the elimination of the hazard).

Within each of the last three phases, certain decisions taken by the Control Group stand out as signifying points at which the course of the emergency was -- or could have been -- altered. At these points, debate was joined over the evaluation of risks; resources and personnel were canvassed; key people interacted, or left to make way for others; and new problems became part of the agenda.

Eight such "key" decisions are analysed here to examine how different agencies and individuals responded to the situation and to each other, and to identify, where possible, the factors that appeared to enter into the decision taken.

The eight decisions are:

- 1) The decision to evacuate populated areas near the site (Sunday, November 11);
- 2) The decision to evacuate Mississauga Hospital (Sunday, November 11);
- 3) The series of decisions to expand the boundaries (Sunday, November 11);
- 4) The reorganisation of the Emergency Operations Control Group (Monday, November 12);

- 5) The decision to allow some re-entry (Tuesday, November 13);
- 6) The evaluation of the CHLOREP team (Wednesday, November 14);
- 7) The decision to allow liquid pumping (Thursday, November 15);
- 8) The decision to allow final re-entry (Friday, November 16).

In general, the organisational response of the key agencies centred around the derailment site can be described as having begun with local, autonomous, immediate-response agencies that committed a sizeable fraction of their available resources to the event. The internal emergency management structure of these agencies sought to mobilize maximum resources and direct them toward the site, while maintaining a skeleton regular staff to handle normal affairs. Alerting senior internal personnel and calling on the assistance of "sister" organisations were the main priorities of the immediate response. In addition, particular emergency organisations with special expertise were called on for information and personnel. Early decisions were made on an improvisational basis, using little technical knowledge but relying heavily on the experience of senior people at the scene.

In the days that followed the initial response, the local autonomous agencies became part of an overall emergency control strategy built on the framework set up by the initial response. This new configuration reflected both the expanding size of the operation, and the need for political management of the situation. In addition to the immediate-response agencies, a new array of small--mostly managerial or expert--components or organisations came on-site. For these organisations, the response to the emergency was peripheral to their larger responsibilities so that it did not consume all

their efforts. The regional and national organisations, the chemical companies, and all the other members of this group, relied on their on-site representatives to ascertain what role the organisation should play in the continuing situation, and to represent the interests of that organisation.

For these and other reasons, the decisions made by the Control Group later in the week differ from the earlier decisions. In the later decisions, opinions from all sectors are weighed, technical information is vetted in substantial depth by the relevant available experts, competence is analysed, supervision of components--hitherto autonomous--is subjected to scrutiny and managerial control, unanimity is sought. Not only that, but the transmission and formulation of the decisions themselves are subjected to analysis. More and more time is taken up with assessing the command structure and the clearing up of jurisdictions and access to key personnel. The nature of risks and questions of perception of risks appear on the agendas of meetings. And by the end, it is possible to state (with all due respect to the strains and stresses on the official personnel) that the emergency itself had become more "routine".

3.2 PRE-EMERGENCY PLANNING

3.2.1 Peel Region Emergency Planning

Essential to the success of the week's operations was the well designed, well defined, and substantially flexible emergency plan put into operation by Peel Region Police. This plan developed out of a number of problems, perceived needs, and events:

- (a) the problems of managing growth in Peel Region;
- (b) the provision of emergency planning in Ontario;
- (c) regional government requirements;
- (d) previous emergencies in the area

As one report on the derailment noted:

When it was formed in 1974, Mississauga already included the Toronto International Airport (the busiest in Canada), a segment of the Queen Elizabeth Way (busiest highway in Canada), the second busiest port on the Canadian side of Lake Ontario, three oil refineries, a petroleum distribution terminal, and two major rail lines...

(Hilbert et al, 1980)

These possible sources of hazard, combined with a spectacular population growth in Peel County (now Peel Region) had had a number of results, of which two are relevant to the organisational response. First, the proper management of burgeoning growth necessitated the creation of modern governmental structures, exemplified by the consolidation by the provincial government of towns, villages and municipalities - including Mississauga (itself a recent consolidation of towns and villages) into Peel Region in 1974. This regional government was based on the previous county system, but was now given the resources to engage in long-range planning. As a result, some of these resources were directed towards planning for emergencies. Second, emergencies in the area have multiplied along with the population.

Under the Regional Municipality of Peel Act, R.S.O. 1973, s.116:

- (1) *The Regional Council may pass by-laws,*
- a) for the establishment and maintenance of an emergency measures civil defence organisation in the Regional area; and*
 - b) for providing moneys for emergency measures and civil defence, for the purpose of the emergency measures civil defence organisation and for the cost of operation of such organisation, and for other work in the Regional Area*

Using these powers, Peel Region drew up its master plan

in conjunction with the Police, municipal and volunteer agencies, to deal with situations

abnormally affecting the lives and property of our society, requiring a controlled and co-ordinated response by a number of agencies, both governmental and private.

(Peel, 1976 Section 1, part 1)

Above these agencies, a co-ordinating body, the regional Emergency Operations Control Group (EOCG), is given the mandate to take control in an emergency situation. In the Mississauga derailment, the Regional Emergency Plan was not put into effect, but the concept of the Emergency Operations Control Group was used. The Peel Region Police Disaster Plan takes the formation of an EOCG for granted when the necessity arises. Even if the Regional Emergency Plan had been put into effect, however, Peel Regional Police would probably have remained the lead agency, since the Chief of Police remains in control where police action or the investigation of criminal acts are involved. The Emergency Plan specifically states:

Where the situation cannot be adequately dealt with under the existing division of statutory responsibilities the Regional Chairman may, at the request of the mayor of the affected Area Municipality, co-ordinate and control all services both of the Region of Peel and the Area Municipality required to deal with the emergency and provide such additional Regional services to such Area Municipality as may be required. However, where police action or investigation is required the responsibility and control in the area will remain with the Chief of Police or his designate and the police action will be co-ordinated with the other services.

(Peel, 1976 Section 2, part 3)

The resources of regional government enabled the Peel Regional Police to live up to their responsibilities by allowing the re-assignment of senior police personnel to emergency planning on a full time basis. Failure to put the Regional Emergency

Plan into effect did have some complicating effects, discussed below in Section 3.3.2.

3.2.2. Peel Regional Police Disaster Plan

As befits an organisation with immediate emergency responsibilities and frequent exercise of those responsibilities, the Police Disaster Plan is flexible, based on previous experience, and thought out in depth. It provides a framework within which all other local agencies can work during an emergency; and yet it can also expand to implement the Emergency Operations Control Group and to include other levels of government.

Peel Regional Police began planning for large-scale emergencies following a natural gas explosion in 1969 which flattened a community in Mississauga, resulting in one death, and the evacuation of 200 people from the area. The death of 108 people in the next year's air crash in Woodbridge near Malton airport underscored the need for the integrated responses of ambulance Red Cross, regional and provincial police to events of this magnitude. With hindsight, one can see that subsequent emergencies highlighted necessary elements in the creation of a workable plan. In 1975, a gunplay incident at a local school in which four people died, forced Peel Police to come to terms with massive media coverage, resulting in subsequent emphasis on managed media centres and having senior officers trained in communication skills. Another air crash at Malton, this time in 1978, required the co-operation and co-ordination of emergency ambulance teams, volunteer agencies, Federal Transport officials, and others. The Texaco oil refinery fire, also in 1978, provided a full-scale "rehearsal" for the derailment. In this incident, over 1,000 people were evacuated from their homes by police, including the residents of a home for the aged. In addition, the Texaco fire tested the co-ordination of police,

fire departments and other agencies, in both using and acquiring personnel and resources. The Mississauga Branch of the Red Cross, for instance, received valuable experience in setting up evacuation and registration facilities.

As a result of these events, the emergency plan is detailed, tested, and known by both senior and junior officers. Major elements in the plan are:

- (a) control at the scene is under the direction of a designated on-scene commander. This person, usually the superintendent from the affected division will be responsible for all police operations related to the incident;
- (b) to make command and control possible, the on-scene commander works from a command post at the scene, and keeps in open-line contact with Peel's dispatch centre. The command post can either be a place taken over for the incident, or the Force's own mobile command trailer (MCT);
- (c) the plan sets out a procedure for notifying senior officers, and other agencies as the need arises;
- (d) a special location is to be established as a media relations centre; and a senior officer is to be assigned to the media.

(Scanlon, 1980)

At the scene itself, the police follow a conceptual framework which is in operation in many other police forces across the province, including the Metropolitan Toronto Police. The object is the isolation--if possible--of the emergency area behind a cordon. At the edge of this cordon, or as close to it as is prudent, the police situate their Command Post which serves as the nucleus of the response operations. Between the first, isolating cordon, and the outside world, is a second cordon within which the emergency response agencies move and operate. Often using the Police Command Post as communications centre, all emergency agencies are controlled (by access, if by no other method) and monitored in this corridor. Inside this corridor

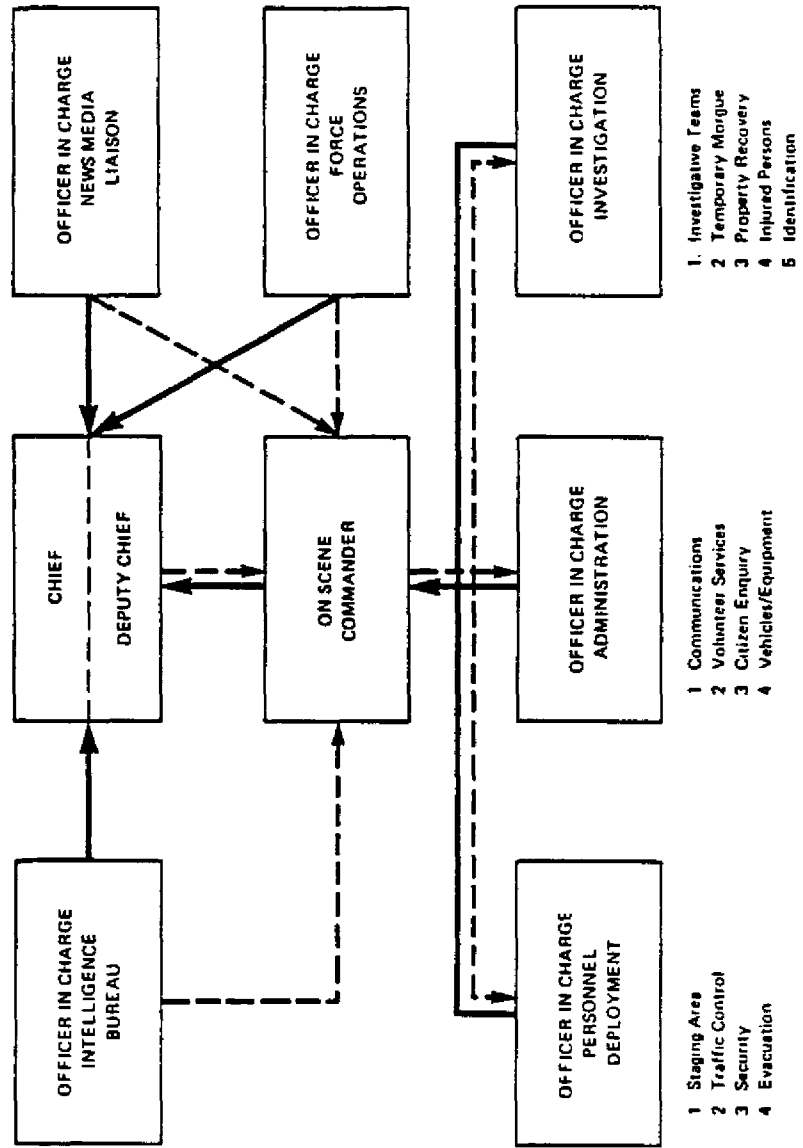
can also be found the Media Centre for the press. Beyond this second cordon, a series of wider and wider cordons (or evacuation areas) can be initiated, radiating away from the site of the emergency.

It can readily be seen from this description that there is an organic flexibility about this cordoning and command post system. In the event that more and more senior levels of government arrive on the scene, the command structure of the police can be altered to match that expansion. The police operate on the principle that the on-scene commander remains in charge of on-scene operations no matter how senior the officers who subsequently arrive may be. The more senior officers act as support, or are assigned to other activities in the expanding situation. In this way, the Chief of Police, for instance, is in overall command on and off scene, but is free to co-ordinate police activities with those of other agencies at the highest levels (see Figure 3.1).

In general, the police consider themselves to be in charge of the emergency incidents for which their plan is put into effect. The introduction of other agencies does not alter that, and - as in Mississauga - even with the creation of an Emergency Operations Control Group and a "think tank" and the incorporation of provincial agencies, the police consider that they are ultimately responsible for the public safety and security in the emergency zone. This is in line with the policy of the Government of Ontario, which at present serves as a support or augment to the first line of defence, the municipality or region in which the disaster takes place. In this case, the strong police involvement facilitated the assumption of overall authority by the Solicitor General, who is himself the senior law enforcement officer in the province.

In order to understand the involvement of the Solicitor General and ministries of the government of Ontario in the

FIGURE 3.1 THE EMERGENCY COMMAND STRUCTURE
PEEL REGIONAL POLICE



emergency, it is necessary to put the Police Disaster Plan and the Peel Region emergency planning effort in the context of emergency planning and response in the Province of Ontario as a whole.

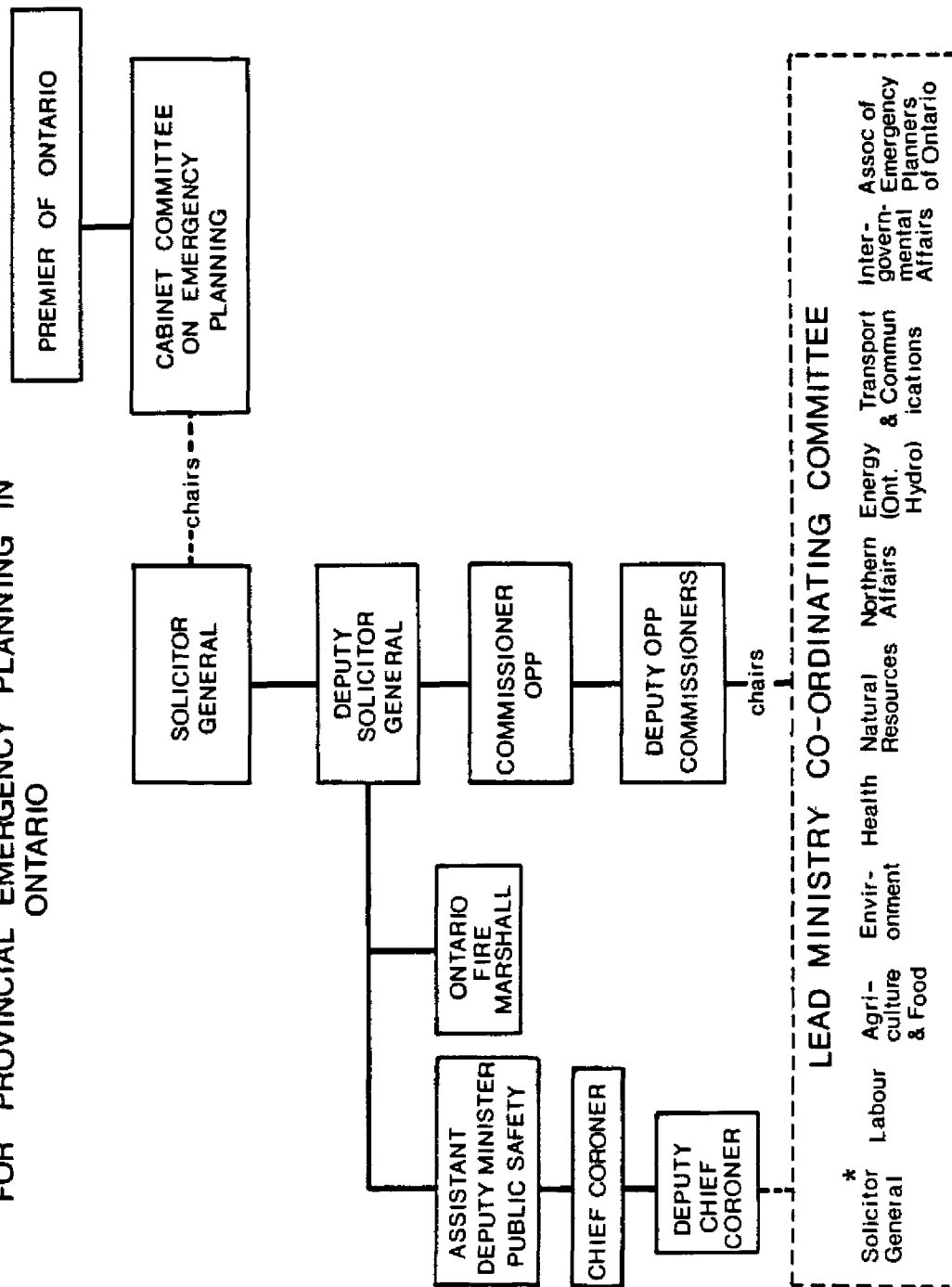
3.2.3. Provincial Emergency Planning

In Ontario, provincial emergency planning has generally been structured around a "lead ministry" concept (as outlined in Orders-in-Council 1484/75, 1487/75 and 178/79). The "lead ministry" structure provides that in the case of an emergency beyond the capacity of private, local or municipal agencies, a ministry of the provincial government, either specially competent or previously designated to handle the particular type of emergency, will become the lead agency; that is, it becomes the co-ordinating and controlling body of any provincial response to the emergency. This may entail the use of its own resources, or any other resources it may be disposed to call upon from other ministries. This designation is jurisdictional, not statutory.

Designated ministries and their special areas of responsibility (as of January, 1979) are:

<u>Ministry</u>	<u>Event</u>
Energy	Energy supply matters
Environment	Spills of chemicals, oil or other contaminants or toxic agents; gas or oil pipeline break
Health	Epidemic
Intergovernmental Affairs	Funding and co-ordination of extraordinary provincial expenditures on emergencies
Labour	Nuclear reactor accident with off-site effects; heavy water accidents with off-site effects
Natural Resources	Flood; forest fire
Solicitor General	Major air crash; snow emergency; other peacetime emergencies; war emergency

FIGURE 3.2 SENIOR POLICY MAKING STRUCTURE FOR PROVINCIAL EMERGENCY PLANNING IN ONTARIO



*Note addition of Emergency Planning Co-ordinator to Solicitor-General's office (1980)

In addition, though not by Order-in-Council, the Ministry of Northern Affairs has been given a co-ordinating role for emergencies in Northern Ontario, involving a response by more than one provincial ministry, and the Ministry of Agriculture and Food takes a lead role in cases of crop disaster and drought.

The present policy-making structure depends on the Emergency Planning Committee of Cabinet, which steers (through the Ministry of the Solicitor General) the Lead Ministry Co-ordinating Committee, made up of planning personnel and other interested parties from the relevant ministries. (See Figure 3.2) There has recently been set up an Emergency Planning Co-ordinator in the Ministry of the Solicitor General.

The policy-making structure is embedded in the Ministry of the Solicitor General, partly because of the Solicitor General's overriding responsibility for public safety, and partly because some of the initial emergency response agencies are within the Solicitor General's Ministry. The communication structure is presumed to function as follows: a municipal official (or possibly a private citizen) who feels that provincial assistance may be required (usually when municipal resources have first been utilised), contacts the nearest detachment of the OPP. They in turn relay the information to OPP Headquarters, where established procedures enable them to pass the communication to a contact person in the appropriate lead ministry. In some cases, the OPP detachment may get in touch directly with the field offices of the ministry. In the case of Mississauga, it appears that all of these functions of the OPP alert system were carried out.

The Federal government is only involved in those contingencies that entail inter-provincial jurisdictions, specially designated for emergency responses, such as radiation accidents, or disasters large enough to require military intervention or an extremely large expenditure of funds (over \$1 per head of provincial population). In many provinces, however, the Federal government has an emergency planning function,

overseen by Emergency Planning Canada, specifically geared to supporting municipal emergency planning. In Ontario, before the lead ministry concept came into being, a joint federal-provincial organisation called the Emergency Measures Organisation (EMO) was the basis of the municipal planning effort. Federal funding now supports the Emergency Planning Officers in those municipalities that retain the old EMO system. (Timmerman, 1980)

There is no municipal-provincial joint planning in Ontario at present, except for planning for specific contingencies such as the evacuation of the Pickering nuclear power plant area following a nuclear accident. Nevertheless, many of the existing municipal plans and by-laws offer guidance and incorporate previous planning efforts into the governing structure. Legislation is now being considered to remedy the obvious gaps in this part of the overall emergency planning effort.

3.2.4. Industry Emergency Planning: TEAP and CHLOREP

Of particular relevance to the Mississauga emergency is the emergency planning carried out on a voluntary basis by private industry, specifically the Canadian chemical industry. The Transportation Emergency Assistance Plan (TEAP) is a 24-hour-a-day, 7 days-a-week emergency telephone communications network run by the Canadian Chemical Producers' Association from Regional Control Centres (RCC), staffed by member chemical companies. This is equivalent to the CHEMTREC system in the U.S.A. The caller can receive standard technical advice immediately from a Technical Adviser who may then communicate with the manufacturer or shipper of the chemical involved. In the case of chlorine accidents, a further industry resource involves CHLOREP, a plan which designates emergency response teams from industries with chlorine-related expertise in sectors dividing up North America. (See Section 2.2.9.) The teams of two or more specialists can be dispatched to provide on-site

assistance in the event of a chlorine spill. This is a voluntary program, and has only been recognised as an appropriate role by the industry itself in the last 15 years.

3.2.5 Volunteer Emergency Planning and Provision of Social Services

Other elements in the emergency planning effort are the volunteer and other agencies providing assistance for social needs during emergencies. Much of the impact of the week's events fell on their shoulders; their planning and response are described in Chapter 4.

3.3 EMERGENCY RESPONSE TACTICS

3.3.1. The Implementation of the Immediate Response Plans

As outlined in the event reconstruction, the immediate emergency plans of the Police, Fire and Ambulance services were implemented within seconds of the derailment, due to the spectacular nature of the accident. In each case, the first concern was the mobilisation of as many personnel and as much ready equipment as possible, even before the specific characteristics of the emergency were fully clarified. The second concern was the alert of more senior personnel, coupled with the commencement of a fan-out procedure linked to the central communications office of each agency. The evidence indicates that this second alerting procedure - in the case of Police and Fire Department - was a combination of official emergency procedures and internal judgements as to personnel priorities within each agency. As the size of the expected response grew, the fan-out became less of a specific alert, and more of a general call-up of all available resources.

Each initially responding agency was thus:

- (a) mobilising all available personnel and resources;

- (b) communicating internally, and to a limited extent with officially designated external agencies;
- (c) setting up a rudimentary command structure.

The seriousness of the situation was immediately apparent to the Peel Regional Police, and within minutes senior officers had put the Disaster Plan into effect. After an initial assessment of the problem, much of the constables' and officers' work was confined to the preliminary establishment of a cordon around the area, through the direction of traffic and the evacuation of skeleton crews on Mavis Road. (See Sections 2.2.3. and 2.2.4) The police log (another requirement of the Disaster Plan), shows that the rudiments of the command structure were in place within half an hour of the derailment, including the first establishment of a designated command post. If there is one failure of the response at this point, it is in the lack of a fan-out procedure that included the Mayor of Mississauga and the Chairman of Peel Region. Although Chief of Police himself had requested that they be contacted, (there is no formal requirement) the Mayor herself telephoned one hour later, and the Regional Chairman was not notified until four to five hours after the derailment. It is clear that Police gave priority to alerting their own people.

The Fire Chief, Gordon Bentley, has himself outlined one of the main problems of a massive early call-up:

If you yield to the temptation to use all these men...or keep them standing by in reserve, this can create a problem at shift change when you need a fresh complement of fresh men at the fire scene and to run the fire halls. In other words, if a chief yields to the natural temptation to pour in everything he's got for a massive first strike, rather than think ahead eight or ten hours, he runs the risk of fatigue setting in to his whole department at the same time.

(Oughton, 1980)

Indeed, one of the lessons of Mississauga for every agency was the need to foresee the possibility of the emergency's lasting more than 24 hours. The other temptation is for the Chief to become a fire-fighter. In both the Police and Fire Departments, the division was made between the on-scene commander and the

overall commander. In the Fire Chief's case, for instance, his time at Headquarters was taken up with inter-departmental co-ordination, locating extra equipment, assigning special duties, organising the "covering" of fire stations by Fire Departments on the fringe of the municipality, and handling the media that converged on his station.

The main characteristic of the second part of the immediate response (that is, that period before the first official evacuation) was the need for increased specificity about the nature of the hazard being faced by the response agencies. Due to the circumstances of the derailment, this took some time to achieve; in addition to managing the men and resources encircling the derailment site, the senior officials of the immediate response agencies on-scene began to try to find out the probable outlines of the entire problem. At his Headquarters, the Fire Chief demanded a copy of the train manifest from CP Rail; at the Command Post, the Police and on-scene Fire Department personnel tried to decipher the smudged manifest in their hands. The resolution of that issue altered the fan-out procedure: in particular, the initial alert of propane companies in the area by the Fire Chief shifted to the alert of TEAP and subsequently the Dow Chemical CHLOREP team in Sarnia (alerted by CP Rail from London).

In the same way, the fan-out procedure had now progressed to the point where emergency groups of larger regional and provincial agencies were alerted. First, the standard emergency numbers were contacted, and the specific group in the organisation with emergency capability responded. In general, this means that senior levels of these peripheral (in the strictly logical sense) groups were not contacted until much later in the morning. There was no automatic progression up hierarchies: the magnitude of the alert followed the perception of the growing magnitude of the response required.

The 1978 Texaco fire had forged strong links between the Police Department and the Red Cross, and it was likely this rapport, rather than a careful following of the Peel Police plan that resulted in the alert of the Red Cross within half an hour of the derailment, well before evacuation of residential areas was being considered (See Section 2.2.7). Nevertheless, this marks the onset of a complicated relationship between the evacuations and the Evacuation Centres which required skilful management, most obviously because many Evacuation Centres had to be opened prior to any influx of evacuees. Clear confidence that this could and would be done by the Red Cross and other agencies without Police supervision was obviously a strong element in the speed with which the first evacuations were decided upon.

The swift implementation of the Police Disaster Plan meant that jurisdictional questions were sorted out very early on: Police Chief Burrows and Fire Chief Bentley confirmed their respective duties, and Burrows took overall command of the emergency. (See Section 2.2.5.)

3.3.2 The Decision to Evacuate Populated Areas Near the Site

The first decision Chief Burrows made was to evacuate homes to the southwest of the site (the direction the wind was blowing at that time). There had already been a clearing of factories north and south of the site, and all official personnel were themselves ordered back at least 600 metres. This was in response to the advice of the Fire Chief and the CP Rail Police who were concerned about the 19 cars of propane and other explosive material that could be expected to explode. There are reports of police knocking on doors in the nearby residential area, advising of the propane danger, well before the official evacuation began.

The key to the evacuation decision, however, was the confirmation of the possibility that a chlorine car was in the burning portion of the derailed train. Chief Burrows was dissatisfied with the assertion (based on the manifest copy) that the chlorine car was not in the wreck. He ordered teams to do a car by car check of the tankers and report back to the Command Post. According to the police transcripts, at 01:38, the danger was reported as shifting from explosives to "volatile, corrosive and highly flammable substances" (See Section 2.2.5.). The perception of the emergency had moved into a new phase based on the probable location of the car. As Burrows also noted in an interview, there was a mixture of chemical smells now present, one of which he thought was chlorine. He said that for the first few hours, one could see the plume of smoke heading downwind from the blaze.

"You didn't need environment officials or balloons to tell you that."

Burrows and his Duty Inspector, Jim Kimber, canvassed the available expertise, which included the Fire Chief, CP Railway Police, C-I-L Chemical Engineers, and a Ministry of the Environment representative who had just arrived at the Domtar plant Command Post. Available information on chlorine was also obtained from the Fire Department standard emergency documents outlining the dangers of hazardous chemicals, the advice of CANUTEC (part of the Information and Emergency Centre of Transport Canada's Hazardous Goods Branch) and the TEAP Technical Advisor.

Ultimately, however, the first decision to evacuate was made on the basis of the police chief's assessment of the danger from chlorine gas, based on:

- (a) the smell of chemical fumes;
- (b) the fact that evacuation area 1 was the closest to the site (See Figure 2.5):
- (c) the fact that the winds were blowing to the west at the time.

At 01:47, Chief Burrows ordered the first official evacuation west of Wolfedale Railway tracks - Mavis Road to Dundas - Erindale Station Road - under the direction of Inspector Kimber and Staff Sergeant Crowell. This was approximately 2 hours after the derailment. The chemical smells and the plume of smoke drifting downwind helped speed the evacuation.

3.3.3. The Transition to the Control Group

It is impossible to mark any one point in the immediate response when the need for "political" response developed out of the emergency situation. One key event, however, was the second stage of the evacuation (04:15), which implied that further evacuation stages were merely a matter of time. In addition, the descent of the chlorine cloud made the nature of the hazard more obvious to all participants, and some began to suffer minor symptoms. A review of the chronologies of the various agencies reveals that at about this time, in almost every case, the communications links were alerting police commissioners, senior management and deputy ministers. In the OPP, the Ministry of the Environment, and in Peel Region itself, there was a manifest sense that - after 4 hours - the possible repercussions of the derailment needed greater resources and input from senior management.

As mentioned above (Section 3.2.2.), the main communications network in the Province of Ontario ministry response is through the OPP which is mandated to alert other ministries as needed, and its own senior officials. In the case of Mississauga, the OPP fulfilled that mandate, since not only did they alert the OPP Commissioner who in turn appears to have contacted the Deputy Minister (Solicitor General), but they also alerted the senior levels of the Ministry of the Environment (MOE). Since from the reports one can conclude that Regional MOE officers on-scene (including duty personnel

manning the telephones) did not alert their own provincial people, the OPP network proves to have been a good back-up system in a way probably not envisioned when the procedure was set up.

In the Peel Region itself, the calling up of the Emergency Operations Control Group occurred at the same time, with Mayor McCallion and Chairman Bean being directed to the site. The detailed description of the relationship between the Police Plan and the Peel Region Emergency Plan suggests the strong police lead agency role in both plans. Because the police were already playing the lead agency role in the derailment, it does not seem to have entered the minds of the participants in the first meeting of the group to ask for official endorsement of the Police plan, nor indeed for the superseding of that plan by the Peel Region Emergency Plan, which would, presumably, have resulted in the overall command of the emergency being assumed by the Chairman of Peel Region. The Chairman has himself noted that the Region would only take charge following a request from the mayor of a local municipality.

The lack of implementation of the Peel Region Emergency Plan did have one or two unforeseen consequences, revolving about the role of Peel Region Social Services. First of all, Social Services was not alerted until quite late by the Police (see 2.27). Secondly, Social Services had carried out a series of surveys of acceptable evacuation sites in the area, which would have been extremely useful in the elimination of places such as the International Centre in Malton from consideration. Thirdly, if the Plan had been implemented, Social Services would have had the power to open and run the evacuation centres themselves, a power which would have solved some of the problems in the early manning of centres.

The other major immediate emergency response during this period was taking place 350 kilometres away from Mississauga in Sarnia. Following notification of the derailment by the CP Chief