November 23, 2016

Alberta Transportation

Dangerous Goods and Rail Safety Branch

Twin Atria Building 4999 98 Avenue

Edmonton, AB T6B 2X3

**Attention: Malcolm Mullin, Director, Dangerous Goods and Rail Safety**

**Re: Medical Requirements – Schedule 10, Industrial Rail Legislation  
 Revised Safety Management System (SMS)**

Dear Malcolm,

Please find enclosed a revised copy of the company’s SMS which highlights the site’s process for conducting informal inspections of rail cars (Section G). We believe that the inspection standard meets the intent of the legislation. Please forward a letter indicating that the inspection criteria noted, meets the intent of the Industrial Railway Regulation (AR 338/2009).

We respectfully further request an exception from the requirement to have persons in safety critical positions (i.e. employees operating a Choose an item.) undergo periodic medicals (as required under Schedule 10, Industrial Rail Legislation). Equipment is operated at a low risk facility on low speed track. Historically, no medical incidents/conditions involving operators of Choose an item.s have been recorded in our industry. We feel that our existing SMS manages the risk appropriately and therefore request that an exemption be granted as indicated. We understand that in the event of an incident occurrence involving injury to people or damage to equipment, directly attributed to a medical condition, the exception would be reviewed by the Rail Safety Branch to determine if an exception continuance is appropriate.

Should you have any questions, feel free to contact me at your convenience.

Sincerely,

Name

Position

Company