

Board of Trustees  
Salt Spring Island Fire Protection District

March 6, 2017

Letter from Reg Jefferd

Re: OHSC Committee faulty decisions could lead to expensive problems- WCB requirements

Thank you for posting online the documents related that are relevant for the upcoming Trustees meetings. This gives the public an opportunity to discover errors or misunderstandings that can lead to problems, and I believe that is the case in the documents provided.

I have spent my entire career in construction management in BC where the WCB is a major factor in the management of all construction activity. I have read at least a hundred reports and acted on many. In some ways these documents are not easy for a non-professional to understand, and so erroneous conclusions can be drawn, as seems to be the case here.

The problem begins with the OHSC Minutes dated Oct 27 Item 3.7 where CAO Peat stated that WCB would do a **non regulatory** inspection at his request. This was to determine which of the potential list of issues actually needed to be addressed.

WCB does not do unofficial inspections. Every inspection is official, and a record is made. In this case a record was made, and on the standard official Worksafe Inspection Report form, see documents related. On this Report there were no Orders. This means that there were no violations of regulations found. The other items listed in the Inspection Notes were discussion items where the inspector was given the opportunity to find and record violations ( his job definition ) , but failed to find any. If he had found any he would have been required to write them up as Orders. So I put it to you that the WCB Report did achieve the purpose that CAO Peat intended. It showed that none of the discussion items in the Inspection Notes need to be addressed in order to meet WCB standards, acknowledged as the highest standards in the world.

Thus all of those items including asbestos, mold, and structural items could safely be eliminated from the OHSC agenda. Or, optionally, they could be addressed, if deemed worthwhile, at leisure. So how did the situation become " that repair and monitoring is to be taken immediately" as per OHSC Minutes of Dec 15,Item 4.1? Clearly some expansion of scope and necessity has happened.

I took the time to see how this occurred. The WCB Inspection Notes, were as described above, merely items that were discussed during the WCB official visit, but found to NOT violate requirements. These **discussion items** ( where no violations were found ) became, going as input to the Harold Engineering proposal , " **WCB requests**", which they were NOT. They came out of the Harold proposal as **proposals**, which went into the OHSC committee minutes as **requirements**. There is no justification for these scope changes. Somehow the scope also expanded to include a seismic review, something not even discussed with WCB. Note that a seismic review already exists, and that curiously, it was done by Harold Engineering. I am at a complete loss to try to understand why Harold Engineering was contacted or involved at all. Certainly it seems that someone was misinterpreting the WCB report to think that they needed to be called, and I didn't notice the Trustees making that decision that should have rightfully

been theirs. So much for the Harold Proposal which should be firmly rejected as entirely disingenuous and unnecessary.

As for the Northwest Report, it is properly addressed in the WCB Report. The found asbestos locations should be identified and communicated. That is it. Nothing else needs to be done. Repair and monitoring do not need to be done, immediately or ever, contrary to the OHSC minutes of December. My advice is to not repair the asbestos in place at all. The mould does not need to be addressed, although it might be advisable to do so in some locations where mould is actually found. However the timing is not critical, do it at your convenience. Confining it with poly as per the January OHSC minutes is exactly the wrong thing to do. This poly must be removed immediately or the mold will grow exponentially. Spray it with bleach or other dedicated chemicals. The suggestion to get a structural engineer to look for structural damage at locations where there is some staining on the ceiling from former roof leaks can safely be ignored, considering the anticipated remaining life of the building. But if you want to look at the structure, you can now do so by removing the drywall an any location that has not been identified as containing asbestos, without taking special precautions, thanks to the Northwest Report.

In summary I recommend that the Trustees instruct their representatives on the OHSC Committee to request that all of the items listed on the WCB Report Inspection Notes be removed from the agenda immediately, as, having been discussed with the WCB inspector, all of those items were found to be in compliance. I also suggest that the motion to hire a structural engineer (OHSC Minutes Dec 15, 3.12 ) should be rejected, as proven unnecessary by the WCB Report.

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