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November 5, 2024

BRENT FRANCIS  
FRANCIS FUELS LTD.  
190 COLONNADE RD S, UNIT 201  
NEPEAN ON K2E 7J5  
CANADA  
[brent.francis@francisfuels.ca](mailto:brent.francis@francisfuels.ca)

**Work Order Type:** FS Variance - LF  
**Work Order No.:** 14226833  
**Facility Type:** Remotely Monitored Gasoline Station  
**Located at:** 1944 MERIVALE RD, NEPEAN, ON, K2G 1E9

**Re: Variance from Clause 5.3.9 of the LFHC 2017, O. Reg. 217/01**

Dear BRENT FRANCIS,

This is in response to your variance application involving a Remotely Monitored Gasoline Station.

Your variance request was to exempt from the requirement for continuous monitoring by trained personnel at a remotely monitoring station.

Please be advised that your variance application has been approved as a research and development project until November 5, 2026 because:

- The facility will be equipped with real-time video surveillance system continuously monitoring/recording all fueling positions.
- The system can be remotely monitored and quickly reviewed from anywhere in the world.
- The system will provide real-time monitoring and logging with SMS and e-mail alerts:
  - Tank product level and consumption patterns
  - Dispenser status and operating patterns
  - Turbine operation and power consumption monitoring
  - TVOC level monitoring of location air quality
- E-Stop button activation will automatically notify Alarm Station and dispatch Fire Department.
- All systems can be shut down remotely.
- The onsite dispenser customer training system.
  - Colour video client training - customers will receive safety and emergency procedure training on the pump display.
- Smoke/Fire/Spill detection AI system (Viana by meldCX)
  - The system involves the implementation of cameras for tracking specific object and incidents.
  - When the camera identifies Smoke/Fire/Spill it will place a red box around it and issue a MQTT code (like an SMS message). Then anything that can be controlled in the IoT space can be done. In case of fire, for example, the turbines would be shut down, the pump heads shut down and alarms triggered, fire department notified, and duty site supervisor notified.

- This is done with approved 3rd party software that runs on the camera. The test data sheets show earlier model cameras, the currently installed cameras exceed earlier model specs.
- Spill containment
    - The pad is designed so that no canopy water drains onto the pad. Canopy water is directly connected to the storm sewers.
  - There is a slight lip on the pad so at a depth of 1mm it can contain ~2.65 ft<sup>3</sup> of liquid (65 litres dispensing limit equals to 2.30 ft<sup>3</sup>, any small spills should be easily contained by the pad)

This variance is allowed under the authority of subsection 36.(3)(c) of the *Technical Standards and Safety Act, 2000*, (the “Act”) and subject to such conditions as may be specified herein, being that:

- The installation/system dealt with in this variance must be inspected by TSSA. Please fill out the FS Customer Inspection Request Form found on our [website](#) and submit to [fuelsinspection@tssa.org](mailto:fuelsinspection@tssa.org) to schedule your inspection;
- Non-conformity with the conditions specified shall thereby cause the allowed variance to become null and void;
- The applicant accepts full responsibility for any and all damages resulting from the use of the thing to which the variance applies. The applicant further accepts full responsibility for any impacts to the health and safety of any person in consequence of the allowance of the variance or of non-conformity with the conditions specified. The Technical Standards and Safety Authority accepts no responsibility for any such damages or impacts;
- In the event of any claims against the Technical Standards and Safety Authority arising from allowance of the variance or non-conformity with the conditions specified, the applicant agrees to indemnify the Technical Standards and Safety Authority and agrees to hold it harmless from such claims and attendant costs;
- The variance process is subject to public access under the TSSA Access and Privacy Code (available upon request). The fact that a variance has been granted and information about any public conditions, such as a requirement to post a sign, may be released on request. Subject to law and the TSSA Access and Privacy Code, proprietary information will not be subject to release;
- The applicant shall pay the fee associated with the review of the variance;
- A copy of the variance letter shall always be kept readily available and permanently legible in the vicinity of the appliance/equipment.
- The equipment shall be installed, operated and maintained in accordance with this application and submitted documents;
- High consequence incidents such as explosions, CO exposures, asphyxiations or an accidental release, vent, leak or spills involving equipment or locations associated with this project shall be reported immediately to Marek Kulik, [mkulik@tssa.org](mailto:mkulik@tssa.org);
- For projects extending beyond one-year, interim reports due on each annual anniversary date shall be submitted to Marek Kulik, [mkulik@tssa.org](mailto:mkulik@tssa.org);
- Final report on the results of the project pertaining to the safety shall be submitted to TSSA Fuels Safety, attention Marek Kulik, [mkulik@tssa.org](mailto:mkulik@tssa.org) by November 5, 2026;

- This authorization shall terminate on November 5, 2026. Accordingly, the installation shall not be used after this date without approval from TSSA;
- TSSA may terminate this authorization before November 5, 2026 on giving sixty (60) days notice in writing to the applicant at the address set out in the application;
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- If, however, the applicant contravenes any of the terms and conditions or fails to comply with the "Responsibility of Applicant" portion of this letter, TSSA may terminate the authorization immediately without notice to the applicant;
- The company in making the submission shall hold sufficient liability insurance pertaining to the equipment in question, which is not less than 1 million dollars per occurrence;
- It is the responsibility of the applicant to:
  - Advise any employees or members of the public participating in the project that the equipment used is approved under a time limited variance as a TSSA Field Development Project; and
  - Control all procedures and fulfill all requirements of this application during the allowance of this Field Development Project.

This variance only relates to the Act and regulations made thereunder and does not exempt you from compliance with other applicable regulatory requirements. The TSSA reserves the right to audit the installation to ensure compliance with the terms of the variance.

Should you have any questions or require further assistance, please Marek Kulik at +1 416-734-3465 or by email at [mkulik@tssa.org](mailto:mkulik@tssa.org). When contacting TSSA regarding this file, please refer to the Work Order number provided above.

Yours truly,



Gary Highfield, P. Eng.  
Engineering Manager, Fuels  
Delegated Authority under section 36(3) (c) of TSS Act

**A legible copy of this letter shall be kept readily available near the appliance/equipment.  
This Variance is not valid unless all Variance Conditions in this letter have been met.**