

Additional Information Requirements for Decommissioning of Existing Facilities

Pursuant to Section 5(2) of the *Environmental Impact Assessment Regulation* of the Clean Environment Act, this document is intended to assist proponents in preparing a registration submission for projects involving the above-mentioned sector. It should be read in conjunction with the General Information Requirements as outlined in the latest version of the Registration Guide. Note that the following items are requirements **in addition to** those outlined in the Registration Guide. For further assistance, please contact the Project Assessment and Approvals Branch, Department of Environment at (506)-444-5382.

After reviewing a registration submission, the Technical Review Committee may require other information beyond the items listed below and in the Registration Guide.

Definition

These guidelines are applicable for projects involving the closure, decommissioning, abandonment or demolition of any undertakings listed in Schedule “A” of the *Environmental Impact Assessment Regulation*

To determine if registration is required for a specific project, please contact the Project Assessment Branch at the number listed above.

1.0 THE PROPONENT

See Registration Guide.

2.0 THE UNDERTAKING

(ii) Project Overview

- A complete description of all proposed activities associated with all infrastructure and facilities at all locations must be provided. It is important to understand that once it has been determined that the proposed undertaking will trigger an EIA, the scope of the EIA is not limited to those portions of the work specifically mentioned in Schedule “A”. As an example, if the proposed activity is the closure of a food processing facility (not listed as an undertaking in Schedule “A”) and an associated wastewater treatment plant (listed as an undertaking in Schedule “A”) the EIA registration document must address the closure of the entire facility (food processing facility plus the waste water treatment plant).

- The intended final use of the site should be described (e.g. restored to pre-development conditions, sold to a new owner, redeveloped for a new use, etc.)

(iii) Purpose/Rationale/Need for the Undertaking:

- The reason for the facility closure should be provided.

(v) Siting Considerations:

- Since the project deals with an existing facility, siting considerations are typically not required.

(viii) Operation and Maintenance Details:

- All proposed activities should be documented and the order in which they will occur should be described. The discussion should include any phasing of the proposed activities and the anticipated timing of each phase.
- Identify the origin of any required fill materials
- Describe the proposed fate of valuable assets (power generation equipment, machinery, etc.)
- The registration document should include a summary table listing all wastes/ materials/ substances/chemicals that will be removed from the site, their estimated quantity, proposed transportation method and their proposed destination. Any materials that would be disposed of on site should also be summarized in a tabular format.

(x) Project-Related Documents

- The file numbers of any previously issued Approvals to Construct or Operate should be provided.
- Any previously completed Environmental Site Assessments should be included in the registration document as appendices.
- If the project was required to undergo a review under the EIA Regulation when it was first initiated, a copy of the registration document should be provided.

3.0 DESCRIPTION OF THE EXISTING ENVIRONMENT

Include all relevant environmental features as noted in the Registration Guide. Examples of issues that may be of particular relevance to this class of project include but are not limited to the following:

- Provide an inventory (key map, table and PIDs) of all properties/facilities involved in the project.
- A scalable drawing must be provided to show the locations of the various buildings structures, storage tanks, pipes, ponds, wells, water lines, transformers, etc. The plan should be annotated to clearly show which of the foregoing will be removed and which, if any, will remain in place.
- A description of any environmental monitoring activities (air, surface water, ground water, soil sampling etc.) which took place when the facility was in operation should be provided. All sampling locations, monitoring wells should be indicated on the above drawing.
- Provide a summary table for all existing monitoring wells listing well construction details (depth, screened intervals, intersected geology, etc.), sampling frequency, and sampled parameters.
- With reference to the above information, indicate which of the wells will continue to be sampled after the site is decommissioned.
- Provide a description of the history of any on-site disposal areas and the waste materials that may have been deposited at these locations; i.e. their composition (organics plastic, metal, etc.) and their identity (tree bark, packaging material, etc.). Will any materials in the disposal areas generate leachate? Is any leachate treatment or groundwater monitoring being proposed in relation to these sites?
- There should be a detailed inspection of buildings and facilities to identify any potentially hazardous materials such as asbestos, lead based paint, etc. The proposed fate of such materials should be described.
- Where it is anticipated that contaminants may exist, an environmental site assessment prepared in accordance with the Department of Environment's current version of the Guideline for the Management of Contaminated Sites must be conducted on the entire project site as part of the EIA. The environmental site assessment must be performed by a qualified site professional in accordance with the aforementioned Guideline. The environmental site assessment should examine all portions of the subject properties for potential sources of contamination. This assessment should also include areas located between potential sources of contamination. The management process for the remediation files that may result from the presence of chemicals of concern as determined by the environmental site assessment will have to be completed until a Record of Site Condition is acknowledged by the Minister of Environment. Typically, this

management process could occur following EIA Determination or approval, rather than as part of the EIA review.

4.0 SUMMARY OF ENVIRONMENTAL IMPACTS

All anticipated impacts should be described and discussed. These will depend on the scope and complexity of the project as well as the project location. See the Registration Guide for further information.

5.0 SUMMARY OF PROPOSED MITIGATION

Describe all mitigation measures that will be employed to minimize the potential environmental impacts identified above. These may include but are not limited to the following:

- A waste audit should be provided, detailing the types and volumes of waste, estimates of non-hazardous waste and reuse/recycling opportunities.
- Further to the above, the proponent should ensure that all non-hazardous waste is separated from hazardous waste prior to recycling or disposal. Landfilling of non-hazardous wastes from the facility should only be undertaken after the reuse and/or recycling of waste options have been employed. Any remaining wastes that cannot be disposed of in on-site landfills, should be disposed of in an existing provincially approved landfill capable of handling these wastes.
- Detail regarding proposed site supervision during the project should be provided. For example: a) Will there be a audit (inspection) of materials to be disposed of/recycled? b) Who will be responsible for ensuring that waste materials are directed to the proper facility (land fill, construction and demolition material disposal site, recycling facility, etc.)? c) Will there be a waste sign-off or manifest system to track shipments of materials?
- All PCB sources (including but not limited to electrical equipment such as transformers, capacitors, lamp ballasts, high voltage cables (PILC Cables), and contaminated soil) must be identified and removed prior to the demolition of any buildings, abandonment of the property, or removal from the property of electrical equipment or any other items or materials that are found to be contaminated with PCB's or that could potentially be contaminated with PCB's. This will entail the completion of a PCB audit to identify all PCB sources, the preparation of an inventory of PCB sources, the preparation of a work plan that describes how these will be dealt with, the approval of this work plan by the Department of Environment, and the subsequent implementation of that work plan (i.e. removal and shipment of these materials to approved PCB treatment/destruction facilities).
- Further to the above: i) All transformers that were decontaminated in the past must be sampled and analyzed to confirm that these units are still free of PCB's; ii) The audit should include

sampling for PCB impacted soil at locations where PCB equipment (i.e. PCB contaminated transformers) were in service. Any PCB impacted soil identified during the audit must be removed from the subject properties and shipped to an approved PCB treatment/destruction facility; iii) PCB capacitors (intact / non-leaking items only), PCB lamp ballasts, and other PCB items (other than transformers and PILC cables) can be handled by the demolition or electrical contractor, provided that the proponent ensures that the contractor has personnel on staff who are trained and knowledgeable of PCB containing equipment; iv) Because of the higher risk associated with the handling of transformers and high voltage cables (and associated potheads), these items must be handled by an approved PCB waste handling firm; v) With regard to PCB transformers, the work plan must discuss transformer preparation and draining procedures, loading, and transportation, as well as information about the intended carrier and receiver; vi) High voltage cables (PILC cables) and associated potheads identified as containing PCB's must also be removed. Sections of cable embedded into or running under concrete slabs or structures can be removed during the final phase of the project, if it is not practicable to remove them during earlier phases, provided that the ends of the cables protruding from the concrete slabs or structures have been properly sealed and protected from early project activities. Handling and removal of PILC cables will also need to be discussed in the work plan.

- How will existing outfall pipes and connections to municipal services (e.g. sewer and water) be addressed? (e.g. cut off and capped? removed? left in place?) What measures will be taken to protect the integrity of the municipal sewer and water system during decommissioning activities (back flow prevention, isolation, etc.)?
- How will water wells and associated water lines be addressed?
- The proponent will typically be required to obtain a special permit from the Transportation Policy Branch, New Brunswick Department of Transportation (NBDOT), if loads are oversized and/or overweight and will have to submit an engineered traffic management plan. The NBDOT would also request that any chemicals contained in the equipment be removed prior to transit to reduce gross mass and prevent an accidental spill.

6.0 PUBLIC INVOLVMENT

See Registration Guide. For large scale decommissioning projects involving the remediation of contaminated sites, it may be appropriate to establish a Community Liaison Committee to keep the public advised as to the status of the project.

7.0 APPROVAL OF THE UNDERTAKING

- Will any proposed activities require municipal permits (building permits, demolition permits, etc.)?

- Appropriate Approvals to Construct needed for any proposed landfill closures and potentially for other activities as well
- If any PCB wastes or other hazardous wastes are intended for disposal or recycling outside the province, the Interprovincial Movement of Hazardous Waste Regulations (IMHWR) administered by Environment Canada under the Canadian Environmental Protection Act, 1999 (CEPA) would be applicable. These regulations set out the conditions which must be met in order to monitor and track the trans-boundary movement of hazardous wastes in Canada to ensure that they are recycled or disposed of in an environmentally sound manner. If any of the identified hazardous wastes are to be shipped for disposal or recycling outside Canada, then the Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations (EIHWRMR) under CEPA would apply.

8.0 FUNDING

See Registration Guide.

9.0 SIGNATURE

See Registration Guide.

10.0 SUBMISSION INSTRUCTIONS

See Registration Guide.

OTHER APPLICABLE GUIDELINES

- All applicable portions of the current version of the Department's Guideline for the Management of Contaminated Sites must be followed as part of the EIA Registration.