FORM-11422 R017*

# Environmental Impact Worksheet

INTERNAL USE

1. The Originator shall complete Section A and review Section D of FORM-11422 and e-mail electronic word copies to BNPD-EIW. Add which facility the work affects in the subject of the email. If the work affects more than one facility, add them all in the subject line (BA, BB, CoS).
2. Environmental STEO completes Section B. Forward for additional review as necessary.
3. Additional Reviewers to provide comments in Section C and return to STEO.
4. Originator accepts the comments and AR actions, as initiated by the Environment Group.
5. Final Acceptance: Environment Manager/Delegate approves and signed copy is provided to the originator.
6. If the originator has self-identified, there is no environmental impact by signing Section D and if the STEO agrees with the assessment, the STEO can sign off, provide the signed copy to the originator and file without manager approval.

**Note:** Environment will respond to EIW originator within **10 working days** with completed EIW or timeline for completion.

**SECTION A: ORIGINATOR**

| **Name:** Andrew Bruce | **Telephone:** 14271 | **Date:** 18JAN2021 |
|---|---|---|

**Department:** Site Services Engineering

**Source of New/Revised Environment Activity:**

☒ ECC Process ☐ Work Plan ☐ Contract ☐ Other, specify:

| DCP | DCN | Contract Req. | Work Order | Project Number | Unit | USI / SCI | Other |
|---|---|---|---|---|---|---|---|
| | | | | | | 67961S | |

**Location:** ☐ Bruce A ☐ Bruce B ☒ COS ☐ Other:

Is there an existing EIW for the design or contract requisition stage for this work?
If YES, reference the EIW number, Engineering Change and/or contract requisition number and contact Environment Officer **before** completing this FORM-11422.

**Title and Description of Activity:**
(Provide attachments and references including Hazardous Chemicals, Flows, and Concentrations, OPEX etc.)

Title: Sewage Processing Plant Controls Upgrade and Third Treatment Train

Additional Details:

To address the failure risk associated with key SPP control systems, the following key SPP control systems are to be upgraded: the SPP master PLC, the UV disinfection GE Fanuc PLC and associated control cabinet, MISA sampling system/data logger and pumping system, effluent flow meters, aeration system air flow meters and the control station/contactor boxes associated with the SPP WAS control valves. An electrical duct bank shall also be installed.

In addition, a third treatment train of similar design shall be installed north of the existing treatment trains. This treatment train is being added for redundancy only as the SPP's rated capacity is not being revised. The additional train will consist of an aeration tank, settling tank, effluent trough and two aerobic digesters. The third train is fed from the same wastewater supply as the two existing trains and the effluent line will tie into the sump within the UV building where the effluent from the existing trains already collects before disinfection. As part of the third treatment

Once complete ensure Record is turned over in compliance with approved RRA.

*Associated with DPT-ENV-00016.

FORM-11422 R017

# Environmental Impact Worksheet

train project, de-watering of the existing site shall be required to facilitate the modification of the existing return activated sludge pumps which are located in the sumps of the two existing settling tanks.

| | | | | |
|---|---|---|---|---|
| Is the work related to Major Component Replacement (MCR) Project? | | | ☐ YES | ☒ NO |
| Estimated Work Schedule:<br>Start Date: 01MAY2021 End Date: 01JUN2023 | | Previous EIW # (approved) for similar work/project: | | |
| Is there OPEX related to the work being performed? If YES include details. | | | ☒ YES | ☐ NO |
| Was licensing screening form completed? | | ☐ N/A | ☒ YES | ☐ NO |
| If yes, please forward to Environment with EIW. | | | | |
| **Environmental Impact Identification Checklist -** Use Appendix C of DPT-ENV-00016 for additional guidance**.** | | | | |
| Were Life Cycle considerations used in the planning of this work (e.g., considerations of waste reduction, environmentally friendly products, minimization of transportation, etc.)?<br>Comments: | | ☐ N/A | ☒ YES | ☐ NO |
| Were Best Available Technology Economically Achievable (BATEA) considerations used in planning this work? (e.g., technology to reduce emissions or spill risks)<br>Comments: | | ☐ N/A | ☒ YES | ☐ NO |
| Will contractors and/or subcontractors be hired to complete this work?<br>If yes,<br>1. Identify in the description section which activities will be contracted and/or subcontracted.<br>2. Ensure attachment 7 “Environmental Stewardship and Waste Minimization” is included in the RFP. | | | ☒ YES | ☐ NO |
| Does contracted work include effluent, environmental monitoring or waste management activities?<br>• If yes, proof of associated qualifications (e.g., training certificates) is required from the contractor for review and approval.<br>• Send proof of these qualifications to environment for review for compliance to CSA N288 series standards (sampling, analysis, interpretation, QA/QC). | | | ☒ YES | ☐ NO |
| Will fuel operated equipment be used for the work?<br>• If yes, indicate fuel and equipment type(s) and #: Diesel Fuel and Hydraulic Oil | | | ☒ YES | ☐ NO |

FORM-11422 R017

# Environmental Impact Worksheet

| | |
|---|---|
| Will the work include the use of chemical products?<br><br>• If yes, are they approved for use on site?<br>• If no, follow BP-PROC-00306 to obtain approval. | ☒ YES ☐ NO<br><br>☒ YES ☐ NO |
| Will the work affect non-radiological (conventional) airborne or waterborne emissions (i.e., increased emissions, new emissions, water runoff, exhaust fumes, chemical odours)?<br>If yes, provide details including location(s), type of emissions, mitigation measures, etc.: Diesel Exhaust, Chemical Odours (VOCs) | ☒ YES ☐ NO |
| Will the work affect radiological airborne or waterborne emissions?<br>If yes, provide details including location(s), type of emissions etc.: | ☐ YES ☒ NO |
| Will the work take place near ditches, streams, or surface water?<br>If yes, provide location(s) and mitigation measures details: Drainage Ditch at B18 | ☒ YES ☐ NO |
| Will the work take place near inactive drains?<br>If yes, provide location(s) and mitigation measures details: | ☐ YES ☒ NO |
| **Halocarbon Containing Equipment:**<br>Will the work or equipment to be used include any halocarbon containing equipment such as: air conditioner, chiller, heat pump, cooler, dehumidifier, refrigeration, compressed air dryer, etc.?<br>Does a Cat ID exist? If yes, please provide:<br>Order equipment **without** halocarbons, refer to BP-PROC-00928 for additional guidance. | ☐ YES ☒ NO |
| Will a trailer be required for this work?<br><br>• If yes, how will power be provided (e.g., generator or connection) Connection at SPP<br><br>• If yes, does the trailer have an air conditioning unit with a cooling capacity >10 kW and >5 kg of refrigerant?<br>  • If yes, a MEL Record is required. | ☒ YES ☐ NO<br><br>☐ YES ☒ NO |
| Does the work involve alteration of the site landscape (vegetation removal, slope changes, storm water runoff modifications, creation of habitat, etc.)?<br>If yes, provide detail locations(s): North of current treatment trains | ☒ YES ☐ NO |
| Does the work involve excavation or hydro excavation?<br>If yes,<br>~~1. The contractor must engage the services of a qualified professional (Geoscientist or engineer) in accordance with O. Reg 153 "Records of Site Condition" to develop a management plan for the material prior to excavation.~~ | ☒ YES ☐ NO |
| Does the modification(s) impact the environmental safety barrier (secondary containment, etc.)?<br>• If yes, please attach a risk assessment and/or contingency plan to prevent an environmental event for the duration that the environmental safety barrier will be impaired.<br>If yes, complete the table below. | ☐ YES ☒ NO |

FORM-11422 R017

# Environmental Impact Worksheet

| | Identify the Material(s) and Source(s) | Approximate Volume (L) | Spill Mitigation Method |
|---|---|---|---|
| 1. | | | |
| 2. | | | |
| 3. | | | |

| | |
|---|---|
| Will the modification alter amounts of water taken or discharged to the lake? If yes, how much water (in litres) will be taken or discharged? | ☐ YES ☒ NO |
| Does the modification involve changes to an industrial sewage works or waste disposal? If yes, provide details: Addition of Third Treatment Train | ☒ YES ☐ NO |
| Will the work direct new effluent to the Sewage Processing Plant (SPP) or require the use of portable toilets or holding tanks? If yes, describe the type and amount of effluent being directed to the SPP or number/capacity of portable toilets or holding tank: | ☐ YES ☒ NO |
| Will the work cause a disruption to the SPP or Drinking Water Systems? If yes, provide details of the disruption including duration and contingency plan: This work is at the SPP, cutover strategy and compensatory equipment shall be utulized as needed. SPP will remain operational throughout project. | ☐ YES ☒ NO |
| Will the work add loading to Bruce A or Bruce B ALW? If yes provide detail: What is the substance, drain rate, volume and concentration? | ☐ YES ☒ NO |
| Does the work affect any regulatory monitoring equipment (e.g., MISA/ECA/Radiological monitoring equipment)?<br>• If yes, specify: New MISA equipment being installed at the SPP, cutover strategy will ensure compliance | ☒ YES ☐ NO |
| Will a laydown area be required to store equipment and material?<br>• If yes, what facility (Bruce A, Bruce B, Centre of Site)?<br>Facility: COS B18 | ☒ YES ☐ NO |
| Will the work generate conventional or hazardous waste?<br>• If yes, complete FORM-10355 for hazardous waste as per BP-PROC-00773 and/or FORM-12663 for conventional waste as per BP-PROC-00196 at the time of waste generation.<br>**Note:** Waste minimization guidance can be found in BP-PROC-00888. | ☒ YES ☐ NO |
| Will the work generate radiological waste?<br>• If yes, complete FORM-11803 and confirm an email has been sent to BNPD Waste Management Department indicating the scope of work. Attach completed FORM-11803 and the EIW (this does not have to be an approved copy of the EIW). | ☐ YES ☒ NO |
| Will the work involve the de-energizing or removal of electrical cables?<br>• If yes, list the equipment codes or cable identifiers in Section A “Title and Description of Activity”.<br>• If yes, engage Environment Waste Lead to determine requirements for PCB analysis. | ☒ YES ☐ NO |

FORM-11422 R017

# Environmental Impact Worksheet

| | | |
|---|---|---|
| Will the work involve the construction or demolition of a building with a total floor area of at least 2000 square meters?<br>If yes, create AR to ensure the project or contractor completes a Waste Audit in accordance with O. Reg 102.<br>AR#: | | ☐ YES ☒ NO |
| **Originator:** (print name)<br>Andrew Bruce | **Department:**<br>Site Services Engineering | **Date:**<br>18JAN2021 |
| **Note:** If the scope of work (e.g., process design, etc.) changes at any time during work, the originator to contact responsible Environmental Authority to review the new scope. A revised/new EIW may be required. | | |

| **SECTION B: ENVIRONMENTAL STEO REVIEW** | **EIW NUMBER: CS-2020-008 - R1** |
|---|---|
| Provide reference to existing Environmental Aspects (EA) to consider during installation and operation:<br>Review current "live" EA database stored on the H:\drive and document:<br>**EA Number and Name - AC Number and Activity Classification Activity Subject:**<br>B-EA-1000 - Emission-Conventional-Air; B-AC-600-n, Construction, Land Development<br>B-EA-10000 - uman/Non-Human Biota Interaction; B-AC-600-n, Construction, Land Development<br>B-EA-8000 - Release to Land; B-AC-79500-s, Use, Storage& Transfer, Hazardous Waste<br>B-EA-5400 - Waste Generation-Conventional; B-AC-600-n, Construction, Land Development | |
| Does this work/project provide any overall environmental opportunities (e.g., reduced emissions, reduced spill risk, etc.)?<br>Comments: Better more reliable environmental data collection, redundency and inproved treatbility | ☐ N/A ☒ YES ☐ NO |

Will activity modify any of the following?

- If yes, please **explain and provide detail of Change**.

| | |
|---|---|
| Environmental Aspects (EA): | ☐ YES ☒ NO |
| Significant Environmental Aspects (SEA): | ☐ YES ☒ NO |
| Is this activity significant enough to warrant a change to the ERA? | ☐ YES ☒ NO |
| Environmental Management System (EMS) Scope: | ☐ YES ☒ NO |
| Environmental Legal Registry: | ☐ YES ☒ NO |
| Environment Documents: | ☐ YES ☒ NO |
| Regulatory Requirements (e.g., Environmental Compliance Approval [ECA]): | ☒ YES ☐ NO |
| Other, specify (i.e., EMP required): | ☐ YES ☒ NO |
| **If any of the above are checked "Yes", an AR owed to DPTENV is required to review and/or revise the affected process or procedure.** AR#: CR 46042 | |

FORM-11422 R017

# Environmental Impact Worksheet

Consider environmental impacts including normal, abnormal and fire conditions.
Consult Environment Programs for additional information, if required.

As part of the environmental impact reviews consider the following:

- Are there groundwater wells in the area? no
- Is there a site of contamination in the area? yes - adjacent property (OPG) spent solvent treatment metals
- Is there a habitat area? Is there one nearby? no
- Are there species at risk to consider? no

| Environmental Risk Ranking (Refer to Appendix B of DPT-ENV-00016) | ☐ 1 Very High | ☐ 2 High | ☒ 3 Medium | ☐ 4 Low | ☐ 5 Very Low | ☐ N/A |
|---|---|---|---|---|---|---|

Comments on risk ranking, acceptance and follow-up (must initiate AR for regulatory commitment):

AR#:
Controls Upgrade:
Spills:
Read and review BP-PROC-00093, Spills to the Environment to understand the internal and external reporting requirements when a release occurs.

NOTIFY your Bruce Power supervisor when releases occur to ensure that all reporting requirements are met where applicable.

Any bulk fuel oil tanks or diesel generators must have secondary containment with 110% capacity of the fuel oil being stored. Conduct circle checks daily for all fuel containing equipment prior to using that equipment that day. Also protect connections on hoses and piping before work begins. During Fueling Activities drip trays should be used to ensure over filling or other drips associated with fueling activities are contained.

Please be aware of drains in the area (active & in-active drains, yard drainage, catch basins, etc.). For high risk work that could result in pollutants being released, drains should be temporarily blocked to minimize the risk of releases to the environment.

Ensure workers are aware of spill kit/ cabinet locations and are familiar with the use of spill mitigation materials relevant for spill risks associated with planned work to ensure prompt spill mitigation if release occurs.

Ensure that releases are cleaned up appropriately and disposed of according to the requirements of BP-PROC-00773, Hazardous Waste and Disposal Requirements.

Conventional Emissions Air:
Nitrogen oxide (NOx) emissions are the most significant air contaminant on site. When possible, use equipment that meets the USA EPA Tier 3 emission standards. Sourcing newer equipment with higher emission controls and lower emissions can help ensure compliance with Ministry of the Environment and Climate Change (MECP) emission limits.

Fuel (e.g. for stationary/portable equipment & heavy machinery), fuel storage, and maintenance areas, shall be located on level ground with an impervious floor surface that will contain gas, oil or other fluids in use. The Originator shall ensure that appropriate secondary containment is in place around any fuel storage containers and during any refuelling (e.g. Drip trays). Fuel/chemical containers must be kept away from yard drains and surface waters to avoid spill risk into yard drainage and other water ways.

Any bulk fuel oil tanks or diesel generators must have secondary containment with 110% capacity of the fuel oil being stored. Conduct circle checks for all fuel containing equipment prior to using that equipment that day. Also protect connections on hoses and piping before work begins.

If a spill occurs, follow BP-PROC-00093 Spills to the Environment to ensure required reporting is completed.

FORM-11422 R017

# Environmental Impact Worksheet

Chemicals:
The originator should obtain a comprehensive list of all chemicals and verify that they are approved through MSDS process by checking the AR#s. Reference BP-PROC-00306 Chemical Risk Management Procedure.
If new approvals required, there is guidance on the Chemistry Programs Intranet page. Allow 4-6 weeks for review.
Hazardous chemical Storage (eg gasoline, compressed gas, chemicals) Follow BP-SM-00010 Chemical Storage Cabinets.

Conventional Emissions to Water:
Consutled MECP and confirmed there are no ECA changes requried based on the scope of this work. The description of the works as written is not affected by these changes

SPP Thrid Train:
100% design has been completed, with full participation from Environment. Pre-consultation meeting has been held with the MECP local district office and CR 46042, activity 6285744 has been created to track the submission of the ECA amendment application. Since the details of the contruction are still out standing (RFP has yet to be sent out) a revision to this EIW will be required once those details are better known. CR 46042, activity 6285749 have been set up to resubmit the EIW for final approval once the consturction vendor has been chosen and more contruction details are understood. It is expected that normal construction impacts will occur (similar to those discussed above as part of the controls upgrade), one area that will need to be clearly outlined is the vendors plan should contamination from OPGs spent treatment facility impact the SPP Third Train excavations. This has been given a medium risk ranking due to the process to apply and acquire an ECA amendment as well as the desire of Bruce Power to start constructioning the facility at risk before an approved amendment is received.

| | | | |
|---|---|---|---|
| Is there demonstration of Life Cycle considerations (e.g., transportation, waste reduction, environmentally friendly products, etc.)? | | ☐ N/A | ☒ YES ☐ NO |
| Is there demonstration of Best Available Technology Economically Achievable (BATEA) considerations (e.g., reduced emissions, reduced spill risk)? | | ☐ N/A | ☒ YES ☐ NO |
| Is additional review required?<br>(e.g., spill risk assessment [refer to DPT-ENV-00016])<br>Specify: | | | ☐ YES ☒ NO |
| New EIW required for other Design Change Notices (DCNs) with this Design Change Package (DCP)?<br>Please provide justification: fully engaged in project meetings | | | ☐ YES ☒ NO |
| Is any of the activity being performed by a contractor? If yes,<br>1. Identify regulatory and environmental considerations for each contracted activity (e.g., spills management, waste management, emissions).<br>2. Input AR to request applicable qualification and/or certification document.<br>3. Arrange for oversight and walkdowns, as appropriate. | | | ☒ YES ☐ NO |
| **STEO (print name):**<br>L. Snider | **Signature**  | | **Date:**<br>18JAN2021 |

FORM-11422 R017

# Environmental Impact Worksheet

| **SECTION C: ADDITIONAL REVIEW** | | |
|---|---|---|
| Additional Review Completed by: | | |
| Comments on risk ranking, acceptance and follow-up (must initiate AR for regulatory commitment):<br>AR #: | | |
| **Reviewer Name (print name):** | **Signature:** | **Date:** |
| Additional Review Completed by: | | |
| Comments on risk ranking, acceptance and follow-up (must initiate AR for regulatory commitment):<br>AR #: | | |
| **Reviewer Name (print name):** | **Signature:** | **Date:** |

| **SECTION D: ACCEPTANCE OF RECOMMENDATIONS** | | |
|---|---|---|
| I have read and understood the environmental evaluation and if applicable accept the actions.<br>Provision of Self Approval: If all environmental risk questions are accurately answered as "No" in Section A, sign off, start the activity and send the signed copy through e-mail to BNPD-EIW for review, oversight and recording. Environmental STEO is to review, agree or disagree with EIW assessment and log in the EIW tracking sheet. If there is disagreement with the assessment, initiate an Station Condition Record (SCR) referring to the EIW number. | | |
| **Originator or Authorized Manager (print name):** | **Signature:** Digitally signed by Serge Goulet Date: 2021.04.01 07:31:59 -04'00' | **Date:** |

| **SECTION E: FINAL ACCEPTANCE** | | |
|---|---|---|
| Review and ensure that follow-up AR is created, if required. | | |
| **Environment Manager or Delegate (print name):**<br>Lyndsay Reid | **Signature:** | **Date:**<br>17MAR2021 |
| **Recommended for Field Oversight (Walkdown):** | | X YES ☐ NO |
| **Note:** This form will not have a separate RRA. Use the approved EIW form as the environmental approval and attach with the applicable source references (e.g., DCP, DCN, Contract Requisition etc.). | | |

INTERNAL USE

**EIW Revision:** CS-2020-008-R002

31-Mar-2021

The following information on management of:

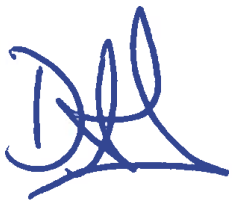
- clean concrete & asphalt,
- dry soil, and
- wet soil, soil slurry & sediment

shall replace the previous guidance outlined in the Environmental Impact Worksheet (EIW) for this project. The following forms a revision to the EIW and shall be followed by the originator and the project team.

If you have any questions on management of waste, please reach out to the Environment Waste SPOCs at “BNPD-ENVConventionalHazardousWaste”.

If you have any questions on management of soil or slurry, please reach out to the Environment Soil SPOCs at “BNPD-Soil Management”.

Thank you,



Dave Snider
2021.03.31
15:26:16
-04'00'

Dave Snider, Technical Officer, Environment & Sustainability, Bruce Power

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**Concrete and Asphalt:**

Asphalt and clean concrete (free of rebar or embedded organic materials) can be recycled (crushed and used as inert fill). If the concrete is not clean (e.g., embedded with rebar), then it must be disposed of off-site at an approved landfill. On-site disposal of concrete is not an approved activity. Submit FORM-12663 to “BNPD-Landfill Waste Disposal Request” to initiate the approval process for disposal.

Concrete slurry from cutting operations may be considered a hazardous waste. Reach out to “BNPD-ENVConventionalHazardousWaste” for guidance if your Project will create drums of concrete slurry.

**Dry soil:**

Dry soil has low moisture content, is not considered a slurry, and it would pass a 'slump test'. If dry soil can remain at the construction site and be used as backfill please exercise this option as it reduces the likelihood of moving contaminated soil from one location to another.

Dry soil may be managed at the On-Site Slurry Management Area by contacting "BNPD-Soil Management". Two management approaches are currently available at Bruce Power:

*Approach #1 – Test prior to excavation*

The Project may work with a Qualified Professional (QP) to characterize the soil quality (contamination) prior to excavation. The QP should be an accredited P.Geo or P.Eng and these services must be procured by the Project. Samples should be taken from multiple locations and suitable depths in order to get a representative characterization of the soil quality. This approach may be useful for locations that are considered medium or high risk due to historical contamination or in situations where soil sampling needs to occur anyway for other project needs (e.g., geotechnical assessment). Although this may involve more work up front, it removes the Project's risk of inadvertently moving contaminated soil and creating a larger problem to manage later on. Off-site disposal costs for contaminated soil are the onus of the Project.

Soil must meet Ontario Soil Standards (Table 3, Industrial Property Use) in order to be managed on-site.

If the soil meets Table 3 criteria, contact Environment Programs ("BNPD-Soil Management") to arrange for on-site disposal with no additional testing required. If the soil exceeds Table 3 criteria, contact "BNPD-ENVConventionalHazardousWaste" in order to arrange for off-site disposal of the contaminated soil area(s). Depending on the results, localized contamination may be managed as hazardous waste and the remainder of the clean soil may be managed on-site.

*Approach #2 – Test after excavation*

This approach is useful for locations that are considered low risk of historical contamination. One or more areas will be established within the Dry Soil Management Area for exclusive use by the Project. The Project will be permitted to deposit their soil at these designated areas, and when the Project is complete they are to notify Environment programs who will have the soils tested to confirm the absence of contamination. Once that confirmation is made, the Project is will no longer be responsible for the soil within these areas and the signage can be removed.

If, after testing, the excavated soil is deemed to contain contamination that exceeds the Ontario Soil Standards (Table 3, Industrial Property Use), Environment Programs will work with the Project to develop a remediation strategy. This may involve additional sampling to further delineate the contaminated soil, followed by off-site disposal with a hazardous waste vendor capable of receiving impacted soil. Environment holds waste contracts that may be used for this purpose; however the Project will be responsible to pay the cost of disposal.

In order to set up an area for exclusive use by the Project, the following tasks must be completed ahead of excavation:

1. Estimate the number and size of the area(s) required in the Dry Soil Management Area. Notify Environment Programs at "BNPD-Soil Management" who will work with Site Services to designate the areas.

2. Create signage using the on-site sign shop with the following information:

"This area is for exclusive use by Project _____. Contact info _____"

*Note for all scenarios*: Soil excavated from radiological zoned areas is treated like all other waste materials and needs to meet "free release criteria" before it can be moved outside the radiological zone. The project must work with Health Physics to meet their requirements.

**Wet Soil, Soil Slurry and/or Sediment:**

Soil slurry would fail a 'slump test' and not hold its shape when piled because there is too much liquid. It is usually generated through hydro-excavation or directional drilling. In most circumstances it is impractical to keep slurry at the construction site and use it for backfill; however that is permitted and preferred as long as sediment runoff is contained.

Slurry may be managed at the On-Site Slurry Management Area by contacting "BNPD-Soil Management". Two management approaches are currently available at Bruce Power:

*Approach #1 – Test prior to excavation*

The Project may work with a Qualified Professional (QP) to characterize the soil quality (contamination) prior to excavation. The QP should be an accredited P.Geo or P.Eng and these services must be procured by the Project. Samples should be taken from multiple locations and suitable depths in order to get a representative characterization of the soil quality. This approach may be useful for locations that are considered medium or high risk due to historical contamination or in situations where soil sampling needs to occur anyway for other project needs (e.g., geotechnical assessment). Although this may involve more work up front, it removes the Project's risk of inadvertently moving contaminated soil and creating a larger problem to manage later on. Off-site disposal costs for contaminated soil are the onus of the Project.

Soil must meet Ontario Soil Standards (Table 3, Industrial Property Use) in order to be managed on-site.

If the soil meets Table 3 criteria, contact Environment Programs ("BNPD-Soil Management") to arrange for on-site disposal with no additional testing required. If the soil exceeds Table 3 criteria, contact "BNPD-ENVConventionalHazardousWaste" in order to arrange for off-site disposal of the contaminated soil area(s). Depending on the results, localized contamination may be managed as hazardous waste and the remainder of the clean soil slurry may be managed on-site.

*Approach #2 – Test after excavation*

This approach is useful for locations that are considered low risk of historical contamination. One or more bermed areas will be established within the Slurry Management Area for exclusive use by the Project. The Project will be permitted to deposit their slurry into these 'cells', and when the Project is complete they are to notify Environment programs who will have the soils tested to confirm the absence of contamination. Once that confirmation is made, the Project is will no longer be responsible for the soil within the cells and the signage can be removed.

If, after testing, the excavated slurry is deemed to contain contamination that exceeds the Ontario Soil Standards (Table 3, Industrial Property Use), Environment Programs will work with the Project to develop a remediation strategy. This may involve additional sampling to further delineate the contaminated soil, followed by off-site disposal with a hazardous waste vendor capable of receiving impacted soil. Environment holds waste contracts that may be used for this purpose; however the Project will be responsible to pay the cost of disposal.

In order to set up a cell for exclusive use by the Project, the following tasks must be completed ahead of excavation:

1. Estimate the number and size of cells required in the Slurry Management Area. Notify Environment Programs at "BNPD-Soil Management" who will work with Site Services to build the bermed areas.

2. Create signage using the on-site sign shop with the following information:

"This area is for exclusive use by Project _____. Contact info _____"

Note for all scenarios: Soil excavated from radiological zoned areas is treated like all other waste materials and needs to meet "free release criteria" before it can be moved outside the radiological zone. The project must work with Health Physics to meet their requirements.