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PRELIMINARY FACILITY DECOMMISSIONING PLAN FOR THE MANITOBA ENVIRONMENTAL CENTRE

1.0 INTRODUCTION

The Manitoba Hazardous Waste Management Corporation has been issued a Licence under the Dangerous Goods Handling and Transportation Act (Licence No. 15HW) to construct and operate a central hazardous waste management facility, known as the Manitoba Environmental Centre (MEC). Section 59 of the Licence requires the Corporation to submit a Preliminary Decommissioning Plan for the MEC within one year of the issuance of the Licence. The following describes the Corporation's Preliminary Decommissioning Plan for the MEC.

2.0 OVERVIEW

The decision to decommission the MEC may be predicated on one or more of the following:

- Hazardous wastes requiring management decrease to levels which make the operation of the facility economically or otherwise unfeasible;
- Facility life expectancy is reached; or
- Alternative operating procedures or superior treatment technologies become available to industry, rendering the facility unnecessary.

Following the submission and approval of the Final Decommissioning Plan the decommissioning process will involve undertaking the following steps and procedures:

- A detailed facility assessment;
- A site investigation;
- Requirements for future use will be established;
- A development plan, based on the above, will be prepared and initiated; and
- The post closure monitoring program will be implemented.

If information obtained during the facility assessment and the site investigation reveal a site contamination problem, the future use

requirements will address the requirements for restoration of the site. The steps to restore the facility will involve the following:

- A detailed site assessment will be completed;
- A restoration plan will be outlined, and reviewed with appropriate stakeholders;
- A specific plan of remediation will be developed and implemented; and
- An evaluation of future use will be made.

The scenarios presented above are discussed in further detail in the following.

3.0 PRELIMINARY DECOMMISSIONING PLAN

3.1 Facility Assessment

The facility assessment will involve collection and review of all reports and records which may impact the condition of the facility. These records will include the following:

- A complete set of design drawings and specifications;
- A record of aerial photos, contour maps, and drainage maps illustrating pre-development site information;
- A complete set of "as-built" drawings;
- General comments from employees addressing concerns regarding facility operation;
- Any reports or comments from regulatory agencies detailing concerns about the facility; and
- The operational history of the facility, including:
 - a detailed account of accidents, spills and leaks and the results of any field investigations and remedial actions taken at that time,
 - a history of breakdowns and associated repairs to the various repository components,

- a complete history of all environmental monitoring performed during facility operation, highlighting instances of contamination, and
- modifications to the facility and/or its operation.

3.2 Site Investigation

The objective of this investigation will be to determine if the site has been contaminated. The information gathered in the facility assessment will outline areas of potential contamination. Field testing will be undertaken to establish the presence and degree of contamination. The evaluation will examine the following areas using detailed analysis of representative samples:

- The site and underlying overburden, including groundwater in the active areas or in areas of known contamination;
- Core samples will be taken through the floor of the main operations building; and
- Core samples will be taken at various locations along the internal roadways of the site.

The testing will determine the site condition, which will subsequently impact future use.

3.3 Requirements for Future Use

Upon completion of the site investigation, requirements for future use will be established. If the site is not contaminated, the requirements will include the following:

- A review of potential future use;
- A review of the capital cost of conversion of the facility for options explored; and
- Disposal methods for process equipment no longer required.

In the event that site restoration is required, the steps required to restore the site, prior to outlining a development plan, are as follows:

- Establish restoration criteria;
- Perform a detailed site investigation;
- Develop a restoration plan;

- Restore the site; and
- Undertake confirmatory testing.

3.4 Site Development

The site development plan will outline the steps required to convert the facility to its intended future use, including:

- Drawings and specifications detailing the extent of conversion;
- A list of equipment, building, process equipment, roads and fencing that require removal;
- Schedule of development;
- Costs associated with the development; and
- Capital recovery from the sale of process equipment, buildings, or the facility itself.

3.5 Post-Closure Monitoring

Post-closure monitoring will identify the following basic requirements with respect to monitoring and maintenance of the site, and in particular, of the repositories. The program may be expanded to other areas of the site based on recommendations established during the decommissioning process:

- The following information will be identified with respect to monitoring and sampling of surface water, groundwater and water collected in the leachate collection systems:
 - frequency of sampling,
 - sampling locations,
 - method of sample collection and analysis, and
 - identification of contractors and laboratories capable of performing sampling and analytical services;
- Repository inspection will address the following:
 - frequency of inspection,
 - cell cap inspection and reporting,
 - leachate collection system, and

- surface water drainage system;
- Site fencing and signage will be inspected;
- Site maintenance requirements will include:
 - grass cutting and reseeding,
 - weed and undesirable vegetation control, and
 - repair of settlement and cap breakdown.

In addition to the above, a funding system for program financing will be established, as well as a mechanism for the independent periodic review of the monitoring program to ensure its effectiveness.

Further considerations, which can only be determined through operating experience, may be added to the plan at a later date. Such items may include:

- Leachate treatment, if the leachate collection system has collected liquids requiring treatment; and
- Contingency plan requirements.

These items, and any others that may develop during the operating life of the facility, will be addressed.