

CONTAMINATED SITES IN MANITOBA SUBMISSION OF REMEDIAL ACTION PLANS

Background

Remediation projects are conducted routinely in Manitoba in order to minimize or eliminate the hazards associated with contaminated/impacted sites. In some instances these projects are initiated in response to regulatory requirements, and in some cases remediation is initiated by the owner in order to enhance the marketability of the property or to reduce the future liability of the owner or occupant. Regardless of the reason for conducting a remediation project, Manitoba Conservation, as the government agency with the mandate for preserving the quality of our environment for future generations, has an interest in ensuring that the project is carried out effectively and in accordance with applicable guidelines and regulations.

For the purpose of the bulletin, remediation projects will include:

- ◆ remediation of identified contaminated/impacted sites
- ◆ clean-up of contamination associated with the removal of petroleum tanks
- ◆ clean-up of contamination or impacts at ongoing operations
- ◆ decommissioning of sites where past operations may have resulted in a residual impact on soil or water

The term "remediation" refers to methods of dealing with the risks associated with site contamination and includes options ranging from on-site risk management to physical, chemical and biological treatment systems.

In order to ensure that remediation projects are implemented effectively, a Remedial Action Plan (RAP) must be developed in advance. Because of the mandate of Manitoba Conservation, it is important that the department be consulted during the RAP development phase. This bulletin outlines the process for that consultation.

1. Submission of Proposed Contaminated Site Remedial Action Plan

A detailed written RAP proposal is to be forwarded to Manitoba Conservation for review prior to the onset of any site remedial work. Prior to reviewing any RAP design/proposal, Manitoba Conservation will require submission of a comprehensive report detailing the nature, degree of severity, and extent (areal and vertical) of site contamination. Along with information on the RAP design (discussed in the following section), this investigation phase information/data will be assessed in determining and approving appropriate site remedial actions.

Proposals should fully outline the proposed procedures and methods, proposed target remediation criteria, quantities of contaminated media, destinations for any off-site transport or treatment and/or disposal, project time frames and any other pertinent information. In dealing with contaminated materials which are classified by Manitoba Conservation as Hazardous Waste, special attention should be given to appropriate transportation requirements (i.e. manifesting, safety marks), generator registration requirements, and treatment facility destinations.

2. Response to RAP Proposal

Upon receipt of a RAP proposal, Manitoba Conservation will review the material to ensure that an appropriate site assessment has been conducted and that the RAP addresses the risk factors in a manner consistent with provincial guidelines and policies. Any requirements for permitting or notification of other agencies will also be identified.

After any deficiencies have been addressed and it is determined that the RAP proposal is acceptable to Manitoba Conservation, a written confirmation will be submitted to the proponent.



3. Submission of RAP Closure Report

Following completion of field activities associated with the RAP, a comprehensive summary report detailing the remedial actions conducted should be forwarded to Manitoba Conservation for review. The report must outline in detail the field activities conducted, account for all offsite transport of contaminated materials, account for receipt of contaminated materials at appropriate offsite treatment/disposal locations, and include all laboratory results for analytical testing of any samples obtained during the RAP program.

Following a review of the RAP closure report by Manitoba Conservation, the appropriate stakeholder(s) will receive confirmation from Manitoba Conservation that the remedial work has been completed to the satisfaction of the department.

OTHER ISSUES

Manitoba Conservation staff may routinely be on-site during contaminated/impacted site remedial actions conducted within the Province, in order to ensure that all appropriate requirements are met, and that site activities are conducted in accordance with applicable regulations.

In the event that the remediation project proceeds without following the procedure outlined in this bulletin, Manitoba Conservation has the authority to issue remedial orders under the terms of The Dangerous Goods Handling and Transportation Act. The order may require submission of data (additional testing) so that revisions to the RAP can be made.

Manitoba Conservation is frequently asked to provide letters confirming the condition of a property or acknowledging that site remediation has been satisfactorily completed. The department may not provide a response if the procedures described in this bulletin have not been followed.

FOR ADDITIONAL INFORMATION, PLEASE CONTACT ONE OF THE FOLLOWING REGIONAL OFFICES

RED RIVER REGION

123 Main Street, Suite 160
Winnipeg MB R3C 1A5

Telephone: (204) 945-7100
Facsimile: (204) 948-2338

NORTHWEST REGION

P.O. Box 2550, Provincial Bldg.
The Pas MB R9A 1M4

Telephone: (204) 627-8307
Facsimile: (204) 623-1773

INTERLAKE REGION

Lower Level, 446 Main St.
Selkirk MB R1A 1V7

Telephone: (204) 785-5030
Facsimile: (204) 785-5024

HEADQUARTERS OPERATIONS

200 Saulteaux Crescent
Winnipeg MB R3J 3W3

Telephone: (204) 945-7009
Facsimile: (204) 945-2420

WESTERN REGION

1129 Queens Ave.
Brandon MB R7A 1L9

Telephone: (204) 726-6064
Facsimile: (204) 726-6567

EASTERN REGION

P.O. Box 4000
Lac du Bonnet MB R0E 1A0

Telephone: (204) 345-1486
Facsimile: (204) 345-1440

NORTHEAST REGION

59 Elizabeth Drive
Thompson MB R8N 1X4

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