

September 16, 1993

ONT29776.A0

Department of Environment and Workplace Safety and Health Fort Osborne Complex 139 Tuxedo Boulevard Winnipeg, Manitoba R3N 0H6

FAX: (204) 945-5229

Attention: Mr. D. Ediger

Dear Mr. Ediger:

Subject: Management of Drill Cuttings and/or Soil Containing Coal Gasification By-

Products

Pursuant to our recent discussion, CH2M HILL will be conducting a subsurface investigation at a former coal gasification site in Winnipeg in the near future. Drill cuttings will be generated which may contain coal gasification by-products. These materials will require management according to the applicable environmental regulations. However, application of the Dangerous Goods Handling and Transportation Act for these materials requires clarification. The purpose of this letter is to initiate discussions on how these materials can be managed and what testing is required.

To assist you in this request, we have attached the following information:

- (i) Ontario Ministry of the Environment (MOE) "Interim Position on the Classification and Disposal of Coal Tar and Contaminated Soils, Sediment and Water and Abandoned Sites (Revised June 1989)".
- (ii) Table 2.4 Summary of Proposed Soil Analysis for Centra Gas Site indicating the chemical parameters we propose to analyze which may be present in the soil
- (iii) Paper by CH2M HILL entitled "Remediation of a Former Coal Gasification Site: A Case History"

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- (iv) Table 2.6 Partial Analysis of Stroudsburg Coal Tar (Villaume, 1982) from CH2M HILL (1987)
- (v) Table 4.5 Solubility of Some PAHs in Water (25°C) (NRC, 1985) from CH2M HILL (1987).

I trust this information will assist you in addressing this request. CH2M HILL also has a number of other reference documents on coal gasification. If a specific request arises, we would be pleased to assist. You may also wish to obtain the Handbook on Manufactured Gas Plant Sites published by the Gas Research Institute in 1985, a useful reference on this topic.

If any questions arise regarding this correspondence, please contact either myself or Mr. Jeff Coyle at the number below. (Note: If you wish to contact the Ontario Ministry of the Environment regarding their policy, I suggest you call Mr. Ed Rodrigues, Waste Management Branch at (416) 323-5200).

Yours truly,

CH2M HILL ENGINEERING LTD.

B. Whiffin, M.Eng., P.Eng.

Project Director

/mjc

cc: A. Galarnyk, Centra Gas