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Centra Gas

Centra Gas Manitoba Inc.
444 St. Mary Avenue
Winnipeg, Manitoba
Canada, R3C 3T7
Tel: (204) 925-0420
Fax: (204) 925-0630

April 17, 1996

Manitoba Department of Environment
Building 2, 139 Tuxedo Avenue,
Winnipeg, Manitoba
R3N 0H6

Attention: Mr. Edwin Yee, Manager, Contaminated Sites Dangerous Goods Section

Subject: Sutherland Avenue Manufactured Gas Plant Site Management Plan Phase IIB- Soil Gas Survey and Ecological Risk Assessment Reports and Conclusions

Dear Mr. Yee:

As part of our commitment to the manufactured gas plant site management plan for our 35 Sutherland Avenue property, I am pleased to provide you with copies of the recently completed Phase IIB Studies. You may recall one of the studies was to evaluate the potential for gas plant vapour migration through soils to neighbouring properties. The other component of Phase IIB was an ecological risk assessment of the Red River in proximity to the 35 Sutherland Avenue property.

In summary, the soil gas study concluded there were no risks associated with soil gases from the former manufactured gas plant and therefore no reason to further investigate soil gas movement or carry out any mitigative actions. Also for your information, we will be communicating soil gas testing results with the neighboring residents, (letter drop). This is in response to our follow up commitment with neighboring residents from last year's phase II reporting.

Results from the ecological risk assessment identified a minor impact on one type of invertebrate group in the localized area of river sediment with gas plant residues. All other fish species and invertebrates sampled and tested did not show gas plant residue bioaccumulation in excess of background levels, indicating the level of contamination exposure and uptake potential is low. The relatively small area of river sediment affected by gas plant residues and the lack of residue bioaccumulation in fish, indicates there is no risk to human consumers. The report also concludes recreational users of the river are unlikely to come in direct contact with the residues. Furthermore, there is no measurable gas plant residue in the water column and the residues in the sediment do not appear to extend above the winter waterline, which should prevent exposure of anyone wading in the water.

Based on these findings and provided the zone of gas plant residues remains stable, the report concludes there appears to be no immediate need for remedial measures related to the sediments containing gas plant residues or their source. At the present time, it is not believed that the sediment area containing gas plant residues is expanding. However, Centra Gas Manitoba is proposing to undertake a three year river sediment monitoring program to verify the stability of the river sediment zone containing gas plant residues. The program would use methods consistent with those employed in this ecological risk assessment. In the unlikely event the river sediment zone is found to be increasing, another assessment of the ecological effects could be conducted to re-evaluate the need for mitigative action. Should this additional work verify sediment stability, it would be our intention to conclude with any

further site assessment or remedial action associated with the river sediments or their source.

We trust your previous review and approval of the ecological risk assessment proposal, and subsequent findings and recommendations of these two studies, meets with your approval and supports our future plans and intentions outlined above. Please contact me with your concurrence and/or any further questions. Thank you.

Andrew Galarnyk
Manager Legal Affairs and Environmental Services

Attachment

c.c. D. Brett
O. Lang

Centra Gas

Centra Gas Manitoba Inc.
444 St. Mary Avenue
Winnipeg, Manitoba
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Fax: (204) 925-0630

April 17, 1996

City of Winnipeg
Waterworks, Waste and Disposal Department
1500 Plesis Road,
Winnipeg, Manitoba
R2C 5G6

Attention: Mr. Arnold Permut P.Eng., Manager of Laboratory Services

Subject: Sutherland Avenue Manufactured Gas Plant Site Management Plan Phase IIB Ecological Risk Assessment Report and Conclusions

Dear Mr. Permut:

As part of our follow up to you and our commitment to the manufactured gas plant site management plan for our 35 Sutherland Avenue property, I am pleased to provide you with a copy of the recently completed Phase IIB Study - Ecological Risk Assessment of the Red River in proximity to the 35 Sutherland Avenue property.

Results from the ecological risk assessment identified a minor impact on one type of invertebrate group in the localized area of river sediment with gas plant residues. All other fish species and invertebrates sampled and tested did not show gas plant residue bioaccumulation in excess of background levels, indicating the level of contamination exposure and uptake potential is low. The relatively small area of river sediment affected by gas plant residues and the lack of residue bioaccumulation in fish, indicates there is no risk to human consumers. The report also concludes recreational users of the river are unlikely to come in direct contact with the residues. Furthermore, there is no measurable gas plant residue in the water column and the residues in the sediment do not appear to extend above the winter waterline, which should prevent exposure of anyone wading in the water.

Based on these findings and provided the zone of gas plant residues remains stable, the report concludes there appears to be no immediate need for remedial measures related to the sediments containing gas plant residues or their source. At the present time, it is not believed that the sediment area containing gas plant residues is expanding. However, Centra Gas Manitoba is proposing to undertake a three year river sediment monitoring program to verify the stability of the river sediment zone containing gas plant residues. The program would use methods consistent with those employed in this ecological risk assessment. In the unlikely event the river sediment zone is found to be increasing, another assessment of the ecological effects could be conducted to re-evaluate the need for mitigative action. Should this additional work verify sediment stability, it would be our intention to conclude with any further site assessment or remedial action associated with the river sediments or their source.

We trust your previous review and approval of the ecological risk assessment proposal, and subsequent findings and recommendations of these two studies, meets with your approval and supports our future plans and intentions outlined above. Please contact me if you have any further questions. Thank you.

Andrew Galarnyk
Manager, Legal Affairs and Environmental Services

Attachment

c.c. A. Andres
D. Brett
O. Lang
E. Yee

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April 17, 1996

Environment Canada
513-269 Main Street
Winnipeg, Manitoba
R3C 1B2

Attention: Mr. Adolf Andres P.Eng., Senior Project Engineer

Subject: Sutherland Avenue Manufactured Gas Plant Site Management Plan Phase IIB Ecological Risk Assessment Report and Conclusions

Dear Mr. Andres:

As part of our follow up to you and our commitment to the manufactured gas plant site management plan for our 35 Sutherland Avenue property, I am pleased to provide you with a copy of the recently completed Phase IIB Study - Ecological Risk Assessment of the Red River in proximity to the 35 Sutherland Avenue property.

Results from the ecological risk assessment identified a minor impact on one type of invertebrate group in the localized area of river sediment with gas plant residues. All other fish species and invertebrates sampled and tested did not show gas plant residue bioaccumulation in excess of background levels, indicating the level of contamination exposure and uptake potential is low. The relatively small area of river sediment affected by gas plant residues and the lack of residue bioaccumulation in fish, indicates there is no risk to human consumers. The report also concludes recreational users of the river are unlikely to come in direct contact with the residues. Furthermore, there is no measurable gas plant residue in the water column and the residues in the sediment do not appear to extend above the winter waterline, which should prevent exposure of anyone wading in the water.

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We trust your previous review and approval of the ecological risk assessment proposal, and subsequent findings and recommendations of these two studies, meets with your approval and supports our future plans and intentions outlined above. Please contact me if you have any further questions. Thank you.

Andrew Galarnyk
Manager, Legal Affairs and Environmental Services

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c.c. D. Brett
O. Lang
A. Permut
E. Yee