MidCanada

March 21, 2011

Manitoba Conservation
123 Main St., Suite 160
Winnipeg, MB
R3C 1A5

Attn: Mr. Don Labossiere
Director, Environmental Operations
Manitoba Conservation

Dear Mr. Labossiere:

Request for Approval of Single Use Soil Treatment Site re: Disraeli Bridge Project

Mid Canada has received a request from Mr. Andrew Eason of Tetra Tech, to receive contaminated soil from the work currently being undertaken within the scope of the Disraeli Bridge project. As with previous similar projects, it is our understanding that Mid Canada will require an approval from Manitoba Conservation in order to receive this soil at our Ile des Chenes facility. Please accept this letter as the application for approval to accept and process soil from the Disraeli Bridge Project as described in the following sections.

In addition to the soil being accepted for treatment, Mid Canada has agreed to accept surplus clean fill for use as landfill cover and to broker the shipment of highly impacted untreatable material to Clean Harbours. Surplus clean fill will be stockpiled pending confirmatory sampling, as described below, before being accepted as landfill over.

Impacted Soil Sources

The majority of the soil to be received by Mid Canada is addressed under two separate Remedial Action Plans related to the land based activities of the Disraeli Bridge Project. The soil originating from the excavation of substructure locations for pile placement and footing construction is discussed in the May 6, 2010 submission from Tetra Tech to Randy Webber, titled Remedial Action Plan Adjacent to the Disraeli Bridge – Winnipeg Manitoba. The management of impacted soil from the relocation of roadways and installation of subsurface utilities is described in correspondence dated December 1, 2010, from Tetra Tech to Randy Webber, titled Remedial Action Plan – Site Services and Road Works Adjacent to the Disraeli Bridge – Winnipeg. Manitoba. It is our understanding that both of these Remedial Action Plans have been reviewed and approved by Manitoba Conservation.

Additionally, Mid Canada is proposing to accept impacted river sediment from caisson drilling below the Red River as described in the Environmental Impact Statement (Wardrop, July, 2010).

Soil Categorization for Treatment

A separate area will be designated at the Mid Canada site for stockpiling of soil from the Disraeli project. Stockpiles will be set up to differentiate levels of contaminants based on the initial analytical results provided by Tetra Tech. As truckloads of soil arrive at the site, a decision on where the load will be deposited will be made based on the area from which the soil originated and the analytical results available for that particular area.

Separate soil stockpiles will be set up as follows, based on available analytical data and other field observations:

"Clean Soil" – expected to be below landfill acceptance criteria for Benzo(a)pyrene (BaP) naphthalene, BTEX and F1 to F4 Petroleum Hydrocarbons. Landfill acceptance criteria for BaP and naphthalene have been set at 20 and 22 mg/kg respectively while the other parameters will conform to Manitoba Guideline 2002-02E.

Low Level – BaP and naphthalene concentrations less than 30 and 1000 mg/kg respectively

Moderate level – BaP concentrations between 30 and 100 mg/kg and naphthalene less than 1000 mg/kg

High Level – Concentrations in excess of Moderate Level and/or visible coal tar in soil

Where there is not a clear indication as to which category should be used for a particular shipment, the worst case option will be applied.

Confirmatory Sampling

Mid Canada will arrange to have a third party conduct confirmatory sampling in accordance with Manitoba Environment Guideline 96-05 on all soil received from Disraeli Project with the possible exception of any visually contaminated High Level material that will not be treated on site. The results of the confirmatory analyses will be used to determine the required treatment level.

Treatment Options

Four options for disposition of the soil from the Disraeli project have been identified, based on the confirmatory analytical results.

- Soil with B(a)P and naphthalene concentrations less than 20 and 22 mg/kg respectively and BTEX and F1 to F4 PHC in compliance with Guideline 2002-02E will be transferred directly to the landfill as cover material.
- Soil with B(a)P and naphthalene concentrations less than 30 and 1,000 mg/kg respectively will be landfarmed to promote natural biodegradation of the contaminants. When subsequent sample results show that target levels have been achieved as per the previous bullet, the soil will be transferred to the landfill as cover material

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- Soil with B(a)P and naphthalene less than 100 and 1,000 mg/kg respectively will be subject to chemical treatment utilizing the ORIN Treatment Process that proved successful on the IKO project. Experience with the IKO soils has shown that after the chemical oxidation process, further landfarming treatment is required to reduce naphthalene levels. Therefore, chemically treated soil will be returned to the landfarming process as per the previous bullet.
- Soil with B(a)P and naphthalene greater than 100 and 1,000 mg/kg respectively will be transported to the Clean Harbors facility for disposal.

All soil treatment for the Disraeli Project will be conducted in areas segregated from other soil treatment operations being conducted at the Mid Canada facility.

Estimated Soil Volumes

The total volume expected to be received at the Mid Canada facility from the Disraeli Project is estimated a 1685 cubic metres. The breakdown of this total volume is as follows:

TABLE 1
Breakdown of Soil Volumes and Categories

SOURCE	EST. VOLUME	CONTAMINANT RANGE
Site Services RAP	415 m^3 550 m^3	Low Surplus clean fill
RAP – Substructure Locations	70 m^3 580 m^3	Surplus clean fill Low to High
EIS – Sediment, Caisson SU6	70 m^3	Clean to Low

Reporting

Mid Canada will employ a tracking system similar to the IKO project whereby all analytical results are recorded on a spreadsheet and a log of daily site activities is maintained. Progress reports can be provided to Manitoba Conservation as required and a final closure report will be prepared when al soil treatment is concluded.

I trust that this provides adequate information to process an approval for this project. If additional information is required please contact Dave Ediger at 771-4245.

Sincerely,

John S. McCabe, P.Eng.

c. A. Eason, Tetra Tech

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Stephens, Mark (CON)

From: Webber, Randy (CON)
Sent: March-01-11 7:58 AM
To: 'Eason, Andrew'
Cc: Stephens, Mark (CON)
Subject: RE: Disraeli Br SU 1 construction

Thanks Andrew,

Bruce Webb and I are meeting with Bill Ebanspanger this morning. The approval letters will go out subsequent to that under Don Labossiere's signature.

I would remind you that in order for mid-canada to accept any of this soil, they must apply for and receive separate approval.

Thanks
Randy

Randy Webber
Manager, Pesticide and Land Use Section
Environmental Assessment and Licencing Branch
Manitoba Conservation
160 - 123 Main Street
Winnipeg MB R3C 1A5
204-945-7107 (phone)
204-945-5229 (fax)
randy.webber@gov.mb.ca

From: Eason, Andrew [mailto:Andrew.Eason@tetratech.com]
Sent: February-28-11 1:37 PM
To: Webber, Randy (CON)
Subject: Disraeli Br SU 1 construction

Randy,

Further to our discussion last week about approvals for the two RAPs submitted for the new Disraeli Bridge work on the south side of the Red River, it is expected that the agreement between the City of Winnipeg and Manitoba Hydro will be submitted to Manitoba Conservation today, i.e. February 28, 2011. It is our understanding the RAP approvals will be issued after Manitoba Conservation has seen the agreement. You had expected that the approvals would be issued this week.

In anticipation of receiving the RAP approvals and to proceed with the construction schedule, the contractor will be moving equipment to the location of pier SU1; the southernmost pier of the bridge. Foundation work will commence at pier SU1 early next week. This will include the pre-boring and driving of precast concrete piles. Based on analytical information presented in the RAP dated May 6, 2010, coal tar related impacts are not expected to be encountered at this location.

Do not hesitate to call if you have any questions.

Regards,
Andrew

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MidCanada

ENVIRONMENTAL SERVICES LTD.

March 7, 2011

Manitoba Conservation
123 Main St., Suite 160
Winnipeg, MB
R3C 1A5

Attention: Mr. Don Labossiere
Director, Environmental Operations
Manitoba Conservation

Dear Mr. Labossiere:

We have been requested by Mr. Andrew Eason of Tetra Tech, to receive contaminated soil from the work currently being undertaken within the scope of the Disraeli Bridge project. This letter addresses impacted soil that may be excavated during the land-based construction activities, in particular at five sub-structure locations. As identified in the Remedial Action Plan, it is estimated that 70 m^3 of "clean soil" will be excavated from sub-structures SU1 & SU2, and an estimated 580 m^3 of potentially contaminated soil will be excavated from sub-structures SU3, SU4 & SU5.

Excavated soil will be categorized by Tetra Tech personnel at the Disraeli project site based on visual observation, vapor concentrations and noticeable odors. The intent is to deliver treatable soil to MidCanada, and non-treatable material to the Clean Harbors facility in Lambton, Ontario.

According to the analytical data provided by Mr. Eason on March 4, 2011, it would appear that, on the basis of 18 samples sent for PAH analyses, only two samples had concentrations of benzo(a)pyrene and naphthalene significantly above MidCanada's acceptance criteria of 20 and 22 mg/kg respectively. It would further appear that these two samples were obtained from soil containing raw coal tar.

PCL and Tetra Tech's operational preference would be to stockpile soil at the MidCanada facility, and have MidCanada's third party Consultant obtain samples for analysis according to Manitoba Environment Guideline 96-05. Once the analyses are received, a

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determination would be made as to the disposition of the material. The following four scenarios are possible, with the appropriate management option provided:

- Soil with B(a)P and naphthalene concentrations less than 20 and 22 mg/kg respectively would be transported to the landfill as cover material;
- Soil with B(a)P and naphthalene less than 30 and 1,000 mg/kg respectively would be incorporated into a treatment pile of soil with similar concentrations awaiting treatment;
- Soil with B(a)P and naphthalene less than 100 and 1,000 mg/kg respectively would be subject to chemical treatment utilizing the ORIN Treatment Process that proved successful on the IKO project; and
- Soil with B(a)P and naphthalene greater than 100 and 1,000 mg/kg respectively would be transported to the Clean Harbors facility for disposal.

Based on the analytical data provided, and with effective material segregation at the Disraeli site, all soil received at the MidCanada facility should fall within the first two categories as provided above. This type of contaminant has been successfully managed at the MidCanada facility over the past few years.

On the basis of the information provided above, we are hereby requesting that Manitoba Conservation approve the use of the MidCanada facility for the treatment and final disposition of this soil. We have attached the analytical data, as provided by Andrew Eason of Tetra-Tech, for your information. If there is anything further that you require, please call me at 981-4813.

Sincerely,

John S. McCabe, P.Eng.