



Conservation and Water Stewardship

Environmental Compliance and Enforcement

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May 22, 2012

Manitoba Hydro

1315 Notre Dame Avenue

Winnipeg, MB R3E 3G2

Attention: Rick Phillips, Construction Project Officer

Dear Mr. Phillips:

Re: **Remedial Action Plan, 69 kV Buried Distribution Line, Rover Burrows work Site - Winnipeg, Manitoba**

This will acknowledge receipt of the Proposed "Remedial Action Plan, 69 kV Buried Distribution Line, Rover Burrows work Site - Winnipeg, Manitoba", dated May 2012 for the removal of PHC, PAH and metal impacted soil associated with the installation of a 69 kV distribution line from the Rover Station to the Burrows Station.

The Remedial Action Plan proposes:

Soil Management:

- Excavation and removal of approximately 400 m³ of PHC, PAH and metal impacted soil.
- The soil will be transported and disposed of at Mid Canada Soil Recycling Facility in Ile des Chenes, Manitoba.
- Should visible evidence of free phase hydrocarbon product or liquid coal tar be observed in any soil at the work site, a sample will be collected for analysis and the soil will be segregated from other soil at the site and placed in a bin that has been sealed with an impermeable liner. Once analytical results are received, the bin will be picked up by a licensed hazardous waste transportation company and removed from the site for final disposal.
- To mitigate the potential for migration from the identified impacted areas to non-impacted areas, a hydrocarbon resistant liner will be placed along the base and sidewalls of the trench prior to installation of the distribution cable and protective concrete barrier.

Groundwater Management

- Groundwater, drilling muds and any surface water that has come into contact with contaminated soil at the site will be managed accordingly. This will include providing adequate containment and characterization prior to off-site disposal by a licensed waste hauler.
- Discharge of excavation/contact water to storm drains or open ground will be prohibited. Groundwater from dewatering activities may be discharged to sanitary drains, with prior approval of the City of Winnipeg and based on analytical test results that meet acceptable criteria specified by the City of Winnipeg.

Backfill Material

- Clean imported backfill material will be used to backfill the excavations.
- Analytical analysis of the backfill material will be required to certify that the fill materials are free of contamination.

Ambient Air Quality Sampling

- One pre construction sample will be obtained at four locations at least one week prior to starting any construction activities to establish a typical background concentration for the contaminants of concern.
- Three sets of air quality samples will be obtained from the four locations during the course of the construction activities at the work site. One post construction sample will also be taken at each location once the site has been restored and all potential exposure to the contaminated soil has been removed.
- In addition to the ambient air quality perimeter monitoring, one ambient sample will be obtained per week from the active excavation area or trench to assess conditions as near the potential source as possible.

Continuous Air Quality Sampling (Gases and Vapours)

- Air monitoring will be conducted continuously during installation of the buried distribution line from the Rover Station to Gladstone Street. A photoionization detector (PID) will be deployed at the work site where construction crews will be conducting the installation of the buried distribution line.
- An action level of 25 ppm above background for an instantaneous reading, sustained over 10 minutes has been selected for the perimeter monitoring.

Indoor Air Quality Monitoring

- One indoor air quality sample will be obtained from the Sutherland Avenue facility near the work site during the installation activities to compare the results with the historic database from this location and provide a record of air quality inside the building while the construction work is being undertaken.

It is the position of Manitoba Conservation that the Remedial Action Plan, 69 kV Buried Distribution Line, Rover Burrows Work Site, Winnipeg, Manitoba be undertaken as proposed. A Summary Report documenting the remediation should be submitted to this office for review at the completion of this work.

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It should be noted that the position of Manitoba Conservation as stated in this letter is based on the information provided to this office by EGE Engineering Ltd. No additional site monitoring was performed by Manitoba Conservation.

Sincerely,



Warren Rospad, B.Sc.
District Supervisor, Environment Officer
Contaminated Sites/Petroleum Storage

File: