Contaminant Management Plans as an Effectual Tool for Environmental Assessment and Regulatory Compliance

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Trace Associates Inc. (Trace) is presenting a risk-based approach of using contaminant management plans as an effective communication tool with stakeholders. The implemented plans facilitate effectual contamination management while minimizing production disruption.

The advantages of the contaminant management plan approach are especially valuable within active facilities undergoing construction and upgrades where the objective of ongoing environmental assessment work is to maintain regulatory compliance with an EPEA approval, while minimizing disruption to operations and production.

Contaminant management plans were developed for discrete areas of the Facility. Clear conceptual site model summaries, screening level risk assessments, and qualitative risk assessments were utilized to prioritize and schedule contamination management and infrastructure upgrades.

Challenges associated with the contaminant management plans that have been successfully employed include:

- Concentrations of petroleum hydrocarbon above the management limits
- Concentrations of polycyclic aromatic hydrocarbon above the applied guidelines potentially associated with elevated anthropogenic background concentrations
- Potential for mandatory Tier 2 trigger (i.e., high groundwater velocity) for the area
- Aggressive schedule to secure regulatory approval and minimize disruption to operations and production.

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