



GOVERNMENT OF  
NEWFOUNDLAND AND LABRADOR  
Department of Municipal Affairs and Environment

## CERTIFICATE OF APPROVAL

Pursuant to the Environmental Protection Act, SNL 2002 c E-14.2 Section 83

Issue Date: *May 29, 2020*

Approval No. AA20-055660

Expiration: *December 31, 2023*

File No. 765.057

Proponent: **Carino Processing Limited**  
P.O. Box 39  
South Dildo, Newfoundland  
A0B 1R0

Attention: **Dion Dakins, Chief Executive Officer**

Re: **Seal Oil Processing Facility and Seal Skin Tannery**

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Approval is hereby given for: the operation of a seal oil processing facility and a seal skin tannery, located at South Dildo, Trinity Bay, NL.

This Certificate of Approval does not release the proponent from the obligation to obtain appropriate approvals from other concerned provincial, federal and municipal agencies. Nothing in this Certificate of Approval negates any regulatory requirement placed on the proponent. Where there is a conflict between conditions in this Certificate of Approval and a regulation, the requirement in the regulation shall take precedence. Approval from the Department of Municipal Affairs and Environment shall be obtained prior to any significant change in the design, construction, installation, or operation of the seal oil processing facility and a seal skin tannery, including any future expansion of the seal oil processing facility and a seal skin tannery. This Certificate of Approval shall not be sold, assigned, transferred, leased, mortgaged, sublet or otherwise alienated by the proponent without obtaining prior approval from the Minister.

This Certificate of Approval is subject to the terms and conditions as contained therein, as may be revised from time to time by the Department. Failure to comply with any of the terms and conditions may render this Certificate of Approval null and void, may require the proponent to cease all activities associated with this Certificate of Approval, may place the proponent and its agent(s) in violation of the *Environmental Protection Act*, and will make the proponent responsible for taking such remedial measures as may be prescribed by the Department. The Department reserves the right to add, delete or modify conditions to correct errors in the Certificate of Approval or to address significant environmental or health concerns.

  
For **MINISTER**

## TERMS AND CONDITIONS FOR APPROVAL No. AA20-055660

May 29, 2020

### General

1. This Certificate of Approval is for: the operation of a seal oil processing facility and a seal skin tannery located at South Dildo, Trinity Bay, NL, as per plans and specifications supplied previously by Carino Processing Ltd. to this Department. The operation produces oil and tanned seal furs. It is noted that this Certificate of Approval is not for the tanning of leather which would require additional chemicals to remove hair and specialized wastewater treatment. Extensive future expansion or change of activities will require a separate Certificate of Approval.
2. Any inquiries concerning this Approval shall be directed to the St. John's office of the Pollution Prevention Division (telephone: (709) 729-2556; or facsimile: (709) 729-6969).
3. In this Certificate of Approval:
  - **accredited** means the formal recognition of the competence of a laboratory to carry out specific functions;
  - **BOD<sub>5</sub>** means biochemical oxygen demand (5 day test);
  - **Carino** means Carino Processing Limited;
  - **CCME** means Canadian Council of Ministers of the Environment;
  - **CSQG** means the Canadian Soil Quality Guidelines;
  - **Department** means the Department of Municipal Affairs and Environment and its successors;
  - **Director** means the Director of the Pollution Prevention Division of the Department;
  - **discharge criteria** means the maximum allowable levels for the parameters listed in Table 4;
  - **effluent treatment system** means **Carino's** effluent treatment system that includes pH adjustment, screen, fat separator, flocculation and filtration systems, settling tank, sludge filter press and all associated works;
  - **EDMS** means Environmental Data Management System;
  - **facility** means **Carino's** seal oil processing facility and seal skin tannery at South Dildo, Trinity Bay, NL;

- **grab sample** means a quantity of undiluted sample collected at any given time. In this Approval it refers to effluent;
- **licensed** means has a Certificate of Approval issued by the Minister to conduct an activity;
- **liquid waste** is defined by the *Slump Test* (Canadian Standards Association test method A23.2-5C for determining the slump of concrete). The liquid waste slump test involves placing the waste in a 30 cm open inverted cone. The cone is removed and the immediate decrease (slump) in height of the waste material is measured. If the material slumps such that the original height is reduced by 15 cm or more, the waste is considered liquid;
- **malfunction** means any sudden, infrequent and not reasonably preventable failure of air pollution control equipment, wastewater treatment equipment, process equipment, or a process to operate in a normal or usual manner. Failures, caused in part by poor maintenance or careless operation, are not malfunctions;
- **Minister** means the Minister of the Department;
- **Plan** means the specific plan as identified in the section of this Approval within which it is used. For example, in the *Waste Management Plan* section it refers to the Waste Management Plan;
- **Primary processing** means the initial preparation of seal skins and includes sorting, washing, splitting, fleshing, drumming, grading and curing as well as seal oil processing;
- **proficiency testing** means the use of inter-laboratory comparisons to determine the performance of individual laboratories for specific tests or measurements;
- **QA/QC** means Quality Assurance/Quality Control;
- **register(ed)**, in the context of storage tanks, means that information regarding the storage tank system has been submitted to a Service NL office and a registration number has been assigned to the storage tank system;
- **regulated substance** means a substance subject to discharge limit(s) under the *Environmental Control Water and Sewage Regulations, 2003*;
- **spill or spillage** means a loss of gasoline or associated product in excess of 70 litres from a storage tank system, pipeline, tank vessel or vehicle, or an uncontrolled release of any volume of a regulated substance onto or into soil or a body of water;
- **storage tank system** means a tank and all vent, fill and withdrawal piping associated with it installed in a fixed location and includes a temporary arrangement;
- **TDS** means total dissolved solids;

- **TPH** means total petroleum hydrocarbons, as measured by the Atlantic PIRI method;
  - **TOG** means total oil and grease;
  - **TSS** means total suspended solids;
  - **used glycol** means glycol that, through use, storage or handling, can no longer be used for its original purpose; and
  - **used oil** means oil that, through use, storage or handling can no longer be used for its original purpose.
4. All necessary measures shall be taken to ensure compliance with all applicable acts, regulations, policies, guidance documents and guidelines, including the following, or their successors:
- *Environmental Protection Act;*
  - *Water Resources Act;*
  - *Environmental Control Water and Sewage Regulations, 2003;*
  - *Halocarbon Regulations;*
  - *Storage and Handling of Gasoline and Associated Products Regulations, 2003;*
  - *Used Oil and Used Glycol Control Regulations;*
  - *Sampling of Water and Wastewater – Industrial Effluent Applications Guidance Document;*
  - *Accredited Laboratory Policy;*
  - *Guidance Document for the Management of Impacted Sites.*
- This Approval provides terms and conditions to satisfy various requirements of the above listed acts, regulations, policy and guidance documents. If it appears that any of the pertinent requirements of these acts, regulations, policy and guidance documents are not being met, then a further review of the works shall be conducted, and suitable pollution control measures may be required by the Minister.
5. All reasonable efforts shall be taken to minimize the impact of the operation on the environment. Such efforts include:
- minimizing the area disturbed by the operation,
  - minimizing air or water pollution,
  - finding alternative uses, acceptable to the Director, for waste or rejected materials,
  - removing equipment or structures when they no longer have further use, and
  - considering the requirement for the eventual rehabilitation of disturbed areas when planning the development of any area on the facility property.
6. **Carino** shall provide to the Department, within a reasonable time, any information, records, reports or access to data requested or specified by the Department.

7. **Carino** shall keep all records or other documents required by this Approval at the facility for a period of not less than three (3) years, beginning the day they were made. These records shall be made available for review by officials of the Department or Service NL when requested.
8. Should **Carino** wish to deviate in any way from the terms and conditions of this Certificate of Approval, a written request detailing the proposed deviation shall be made to the Minister. **Carino** shall comply with the most current terms and conditions until the Minister has authorized otherwise. In the case of meeting a deadline requirement, the request shall be made at least 60 days ahead of the applicable date as specified in this Approval or elsewhere by the Department.

### **Effluent Treatment**

9. Any seal oil, sludge and/or solids generated in the effluent treatment system shall be removed at a frequency sufficient to ensure that the system's ability to operate is not impeded.
10. Under no circumstance shall untreated effluent be released to the environment.
11. Effluent to be treated includes:
  - Blood water from primary processing
  - Brine from the salt pounds
  - Wastewater from secondary processing
  - Waste seal oil and wastewater from the seal oil refinery

### **Waste Management**

12. The Management of waste generated at the facility is subject to compliance with the *Environmental Protection Act*. All non-industrial waste shall be stored in a manner acceptable to the Department and, on at least a weekly basis, be disposed of:
  - at an authorized waste disposal site, with the permission of the owner/operator of the site; or
  - by some other means acceptable to the Department.

If required, industrial waste shall be disposed of by a licensed operator.
13. **Carino** shall ensure that all volatile chemical and solvent wastes, if they cannot be reused, are placed in suitable covered containers for disposal in a manner acceptable to the Department. Disposal of liquid wastes at waste disposal sites in the province is not permitted.
14. Waste sawdust that is generated from primary processing and/or dressing operations and to which no toxic agents have been added (e.g. degreasing agents, etc.) shall be either:
  - composted at a facility of **Carino's** choice, provided that the Department has approved of the end composting use, or

- disposed in an approved waste disposal site, provided the owner/operator is willing to accept such waste and the local Service NL regional office has agreed with the disposal of the material at the site.

15. Any solids or filter press cake collected from the effluent treatment system as well as waste sawdust which has been exposed to tanning chemicals and is no longer reusable shall be tested as per Table 1, and results submitted to the Director for review prior to each disposal event.

Table 1 – Effluent Treatment System Solids and Waste Sawdust Analysis Program				
Proposed Means of Disposal	Parameters			
Waste Disposal Site	Metals Scan (Including Hexavalent Chromium) TPH			
Composting <sup>†</sup>	Arsenic	Cadmium	Cobalt	Chromium
	Copper	Mercury	Molybdenum	Nickel
	Lead	Selenium	Zinc	
† Applies to Waste Sawdust Only				

16. Where all contaminant concentrations are below, or equal to, the maximum allowable levels as outlined in the CSQG for industrial land use, the waste is not considered hazardous and may be disposed in an approved waste disposal site, provided the owner/operator is willing to accept such waste and the local Service NL regional office has agreed with the disposal of the material at the site.

17. Where all contaminant concentrations are below, or equal to, the maximum allowable levels outlined in the CCME Guidelines for Compost Quality, waste sawdust which has been exposed to tanning chemicals may be used for composting, provided the Department has approved of the end composting use.

18. Where one or more contaminant concentrations are in excess of the maximum allowable levels outlined in the CSQG for industrial land use, the waste shall be further tested using the US Environmental Protection Agency Method 1311, the Toxicity Characteristic Leaching Procedure (TCLP), or other procedure as determined by the Director. Contaminants which shall be tested, using the TCLP, are those which were in excess of the maximum allowable levels outlined in the CSQG for industrial land use. Results of analysis of the extractant shall be submitted to the Director as per the **Reporting** section.

19. Where all contaminant concentrations in the extractant are below the maximum allowable levels, as determined by the Director, the waste is not considered hazardous and may be disposed in an approved waste disposal site, provided the owner/operator is willing to accept such waste and the local Service NL regional office has agreed with the disposal of the waste at the site.

20. Where one or more contaminants in the extractant are above the maximum allowable levels, as determined by the Director, the waste is considered a hazardous waste.

21. Seal flesh, hair, trimmings and other organic wastes may be disposed of at an authorized waste disposal site with the permission of the owner/operator of the site. Landfilling of these wastes and/or wastes from the effluent treatment plant requires the preparation of a trench at the site prior to the disposal, with liming (at sufficient quantities to control odour) and backfilling of the waste performed on the day of disposal.
22. Disposal of hazardous waste in a municipal or regional waste disposal site in this Province is prohibited. Transporters of hazardous waste shall have an Approval issued by the Minister. Those generating hazardous waste shall have a waste generator's number issued by the Director and shall also complete the required information outlined in the Waste Manifest Form.

### **Waste Management Plan**

23. **Carino** shall continue to implement the Waste Management Plan (*November 13, 2013*) for their facility, including all revisions. Every year the Plan shall be reviewed and revised as necessary, accounting for expanding or alteration of activities. All proposed revisions shall be submitted to the Director for review. The Department will acknowledge receipt of the Plan and/or revisions, and shall provide any review comments within a reasonable time frame.

### **Open Burning**

24. Materials listed in Table 2 shall not be burned in open fires.

<b>Table 2 - Material Not Approved for Open Burning</b>	
tires	manure
plastics	rubber
treated lumber	tar paper
asphalt and asphalt products	railway ties
drywall	paint and paint products
demolition waste	fuel and lubricant containers
hazardous waste	used oil
biomedical waste	animal cadavers
domestic waste	hazardous substances
trash, garbage, or other waste from commercial, industrial or municipal operations	materials disposed of as part of the removal or decontamination of equipment, buildings or other structures

25. The Department shall be notified prior to the burning of any materials not listed in Table 2.

## **Noise**

26. Efforts shall be made to minimize and control noise resulting from **Carino's** operations and maintenance activities. All vehicles operating within the facility shall have exhaust and muffling devices in good working order.

## **Chemical Operations**

27. All chemical loading and blending shall be done inside the facility, with no chemical containers being opened outside. All vessels will be blanketed to eliminate vapour or odour releases.
28. Empty chemical drums, totes or packaging shall be either sent:
- back to the original equipment manufacturer for re-use;
  - to a recognized disposal company; or
  - to a recognized re-cycling facility.

When deemed necessary, waste material from drums, totes or packaging will be retained on-site for collection and disposal by a recognized waste treatment company according to provincial and federal regulations.

## **Spill Prevention and Containment**

29. The areas in which seal oil are to be used or stored shall have impermeable floors and a gutter system that discharges to the wastewater treatment system. These gutters shall be kept clear of material that may compromise the capacity of the gutter system.
30. Areas in which tanning chemicals (liquids) are used or stored shall have spill containment systems constructed with impermeable floors, walls, dykes or curbs as applicable and be configured, maintained, inspected and repaired as follows:
- they shall not discharge to the environment;
  - they shall have an effective secondary containment capacity of at least 110% of the chemical storage tank capacity, in the case of a single storage container;
  - if there is more than one storage container, they shall have an effective secondary containment capacity of at least 110% of the capacity of the largest container, or 100 % of the capacity of the largest container plus 10% of the aggregate capacity of all additional containers, whichever is greater;
  - they shall be kept clear of material that may compromise the containment capacity;
  - they may include a floor drain system provided that the floor drains, and the place or device to which they drain, are configured in such a manner that the required effective secondary containment capacity is maintained;
  - every year they shall be visually inspected for their liquid containing integrity, and repairs shall be made when required; and
  - once every ten years, spill containment systems shall be inspected, by a means other than visual inspection, for their liquid containing integrity, and repairs shall be made when required.



31. All on site storage of petroleum shall comply with the *Storage and Handling of Gasoline and Associated Products Regulations, 2003*, or its successor. Storage tank systems shall be registered with Service NL. All aboveground storage tanks shall be clearly and visibly labelled with their GAP registration numbers.
32. Where applicable, all tanks and fuel delivery systems shall be inspected to appropriate American Petroleum Institute or Underwriters' Laboratories of Canada standards, or any other standards acceptable to this Department. The required frequency of inspections may be changed at the discretion of the Director.
33. **Carino** shall maintain an inventory of all petroleum and chemical storage tanks. This inventory shall include the following:
- site plan showing tank location,
  - registration number (where applicable),
  - identification number,
  - material stored,
  - capacity,
  - annual throughput,
  - tank material,
  - tank type,
  - tank diameter,
  - tank height,
  - tank colour,
  - roof type,
  - year of manufacture,
  - date of installation,
  - date of last inspection,
  - failure history,
  - maintenance history,
  - effective secondary containment capacity, and
  - date of next planned inspection.

An update of the complete storage tank inventory, including any changes to it, shall be submitted to the Director within three (3) months of the change having occurred.

### **Contingency Plan**

34. **Carino** shall continue to implement the Contingency Plan (*December 2010*) for their facility, including all revisions. This Plan describes the actions to be taken in the event of a spill of a toxic or hazardous material. Copies of the Plan shall be placed in convenient areas throughout the facility so that employees can easily refer to it when needed. **Carino** shall ensure that all employees are aware of the Plan and understand the procedures and the reporting protocol to be followed in the event of an emergency. An annual response exercise is recommended for response personnel. Every year, as a minimum, the Plan shall be reviewed and revised as necessary. Any proposed significant revisions shall be submitted to the Director for review. Changes which are not considered significant include minor variations in equipment or personnel characteristics which do not affect implementation of the Plan.

35. Every time **Carino** implements the Contingency Plan, information shall be recorded for future reference. This will assist in reviewing and updating the Plan. The record is to consist of all incidents with environmental implications, and include such details as:

- date;
- time of day;
- type of incident (i.e. liquid spill, gas leak, granular chemical spill, equipment malfunction, etc.);
- actions taken;
- problems encountered; and
- other relevant information that would aid in later review of the Plan performance.

Each incident report shall be submitted to the Department as per the **Reporting** section.

### Site Decommissioning and Restoration

36. An Industrial Site Decommissioning and Restoration Plan has been submitted to the Department (**September 2014**). The Plan shall be implemented progressively as required and completed upon site closure.

37. As part of the site decommissioning and restoration process, **Carino** shall employ a registered Site Professional to complete a site-wide environmental site assessment, as defined in the **Guidance Document for the Management of Impacted Sites**. Should impacts be identified, **Carino** shall proceed through the process outlined in the Guidance Document to achieve regulatory site closure.

### Used Oil and Used Glycol

38. Used oil and used glycol shall be retained in separate approved or registered tanks or closed containers, and disposed of by a company licensed for handling and disposal of used oil and/or used glycol products.

### Effluent Monitoring and Discharge

39. **Carino** shall perform an Effluent Monitoring Program as per Table 3. The applicable limits for the effluent discharge are listed in Table 4. All analytical results shall be submitted to the Director as per the **Reporting** section.

Table 3 - Effluent Monitoring Program					
Location	EDMS Location Code	Parameters			Frequency
Grab Sample Immediately Prior to Discharge	00339	Boron	Iron	pH	Weekly Grab Sample if Outflow
		Cadmium	Lead	BOD <sub>5</sub>	
		Chromium	Nickel	TSS	
		Chromium (VI)	Zinc	Copper	
		TOG	Ammonia	Phenolics	

40. **Carino** may reduce the frequency of testing for a parameter that is set out in Table 3 to not less than once per month if that parameter's weekly concentration has been compliant with the limits outlined in Table 4 for the 12 samples immediately preceding the most recent test. Carino shall notify the Director in writing of the reduction in the frequency of testing in the monthly report submitted as per the **Reporting** section.
41. **Carino** shall increase the frequency of testing to the originally prescribed frequency for a parameter that is set out in Table 3 immediately following any result that is not compliant with the limits outlined in Table 4. Carino shall notify the Director in writing of the increase in the frequency of testing in the monthly report submitted as per the **Reporting** section.

Table 4 - Effluent Discharge Criteria	
Parameter	Allowable Limits *
Ammonia	2.0
Boron	5.0
Cadmium	0.05
Chromium	1.0
Chromium(VI)	0.05
Copper	0.3
Iron	10.0
Lead	0.2
Nickel	0.5
Zinc	0.5
pH	5.5 – 9.0 pH Units
Phenolics	0.1
BOD <sub>5</sub>	20.0
TSS	30.0
Total Oil & Grease	15
* All units are expressed in mg/L unless otherwise stated.	

42. All oil/water separators shall be checked routinely to ensure they are working properly. A log of these checks shall be maintained.

### Water Chemistry Analysis

43. **Carino** shall perform a Water Chemistry Analysis Program monthly during primary processing and tanning operations as per Table 5. All results shall be submitted to the Director as per the **Reporting** section.

Table 5 - Water Chemistry Analysis Program					
Location	EDMS Location Code	Parameters			
Grab Sample Immediately Prior to Discharge	00339	<b>General Parameters</b> - must include the following:			
		nitrate + nitrite nitrate nitrite ammonia pH	colour sodium potassium calcium sulphide cyanide	magnesium alkalinity sulfate chloride turbidity TSS	reactive silica orthophosphate phosphorous DOC conductance TDS (calculated)
		<b>Metals Scan</b> – must include the following:			
		aluminum antimony arsenic barium beryllium bismuth	boron cadmium chromium cobalt copper	iron lead manganese molybdenum mercury	nickel selenium silver strontium thallium tin titanium uranium vanadium zinc

### Analysis and QA/QC

44. Unless otherwise stated herein, all solids and liquids analysis performed pursuant to this Approval shall be done by either a contracted commercial laboratory or an in-house laboratory. Contracted commercial laboratories shall have a recognized form of accreditation. In-house laboratories have the option of either obtaining accreditation or submitting to an annual inspection by a representative of the Department, for which **Carino** shall be billed for each laboratory inspection in accordance with Schedule 1 of the *Accredited Laboratory Policy (PD:PP2001-01.2)*. Recommendations of the Director stemming from the annual inspections shall be addressed within 6 months; otherwise further analytical results shall not be accepted by the Director.
45. If **Carino** wishes to perform in-house laboratory testing and submit to an annual inspection by the Department then a recognized form of proficiency testing recognition shall be obtained for compliance parameters for which this recognition exists. The compliance parameters are listed in the *Effluent Monitoring and Discharge* section. If using a commercial laboratory, **Carino** shall contact that commercial laboratory to determine and to implement the sampling and transportation QA/QC requirements for those activities.
46. The exact location of each sampling point shall remain consistent over the life of the monitoring programs, unless otherwise approved by the Director. Using a GPS or similar device, the northing and easting of each sampling location shall be recorded and submitted by **October 31, 2020** to the Department.
47. **Carino** shall bear all expenses incurred in carrying out the environmental monitoring and analysis required under conditions of this Approval.

## Monitoring Alteration

48. The Director has the authority to alter monitoring programs or require additional testing at any time when:
- pollutants might be released to the surrounding environment without being detected;
  - an adverse environmental effect may occur; or
  - it is no longer necessary to maintain the current frequency of sampling and/or the monitoring of parameters.
49. **Carino** may, at any time, request that monitoring programs or requirements of this Approval be altered by:
- requesting the change in writing to the Director; and
  - providing sufficient justification, as determined by the Director.

The requirements of this Approval shall remain in effect until altered, in writing, by the Director.

## Reporting

50. Monthly reports containing the environmental compliance monitoring and sampling information required in this Approval shall be received by the Director in digital format within 30 calendar days of the reporting month. All related laboratory reports shall be submitted with the monthly report in XML format and Adobe Portable Document Format (PDF). Digital report submissions shall be uploaded through the EDMS web portal. The Pollution Prevention Division shall provide details of the portal web address and submission requirements.
51. Each monthly report shall include a summary of all environmental monitoring components and shall include an explanation for the omission of any requisite data. The monthly summary reports shall be in Microsoft Word or Adobe PDF and shall be uploaded through the EDMS web portal with the data submissions.
52. All incidents of:
- *Contingency Plan* implementation; or
  - non-conformance of any condition within this Approval; or
  - spillage or leakage of a regulated substance; or
  - discharge criteria being, or suspected of being, exceeded; or
  - verbal or written complaints of an environmental nature received from the public by **Carino** and related to the facility, including complaints submitted anonymously;

shall be immediately reported, within one working day, to the Department.

A written report including a detailed description of the incident, summary of contributing factors, and an Action Plan to prevent future incidents of a similar nature, shall be submitted to the Department. The Action Plan shall include a description of actions already taken and future actions to be implemented, and shall be submitted within thirty days of the date of the initial incident.

53. Any spillage or leakage of gasoline or associated product shall be reported immediately through the Canadian Coast Guard at 1-(709)-772-2083.

### **Expiration**

54. This Certificate of Approval expires *December 31, 2023*.
55. Should **Carino** wish to continue to operate the seal oil processing facility and seal skin tannery beyond this expiry date, a written request shall be submitted to the Director for the renewal of this Approval. Such request shall be made prior to *June 30, 2023*.

## APPENDIX A

### Industrial Site Decommissioning and Restoration Plan Guidelines

As part of the Department of Municipal Affairs and Environment's ongoing commitment to minimize the residual impact of industrial activities on the environment of the province, the Department requires that Carino develop a Decommissioning and Restoration Plan for the seal oil processing facility and seal skin tannery at South Dildo, Trinity Bay, NL and its associated property. The guidelines listed below are intended to provide some general guidance as to the expectations of the Department with regard to the development of the Plan, and to identify areas that are of particular concern or interest. The points presented are for consideration, and are open to interpretation and discussion.

Decommissioning and Restoration Plans are intended to present the scope of activities that a company shall undertake at the time of final closure and/or decommissioning of the industrial properties. Where it is useful and practical to do so the company is encouraged to begin undertaking some of the activities outlined in the Plan prior to final closure and decommissioning. The objectives of the restoration work to be undertaken can be summarized as follows:

- to ensure that abandoned industrial facilities do not endanger public health or safety;
- to prevent progressive degradation and to enhance the natural recovery of areas affected by industrial activities;
- to ensure that industrial facilities and associated wastes are abandoned in a manner that will minimize the requirement for long term maintenance and monitoring;
- to mitigate, and if possible prevent, the continued loadings of contaminants and wastes to the environment. The primary objective shall be to prevent the release of contaminants into the environment. Where prevention is not practical due to technical or economic limitations then activities intended to mitigate the consequence of such a release of contaminants shall become the objective of restoration work;
- to return affected areas to a state compatible with the original undisturbed condition, giving due consideration to practical factors including economics, aesthetics, future productivity and future use; and
- to plan new facilities so as to facilitate eventual rehabilitation.

The Decommissioning and Restoration Plan should:

- identify areas of known historical or current contamination;
- identify past or existing operational procedures and waste management practices that have, or may have, resulted in site contamination;
- highlight the issues or components to be addressed;
- identify operational procedures and waste management practices that can prevent or reduce site contamination;

- consider future land use, regulatory concerns and public concerns;
- enable estimation of the resources and time frame required to decommission the facility and restore the site to a condition acceptable to the Department;
- enable financial planning to ensure the necessary funds for decommissioning and restoration are set aside during the operational life of the facility, and;
- include arrangements for appropriate project management to ensure successful completion of the decommissioning and restoration program.



cc: Mr. Neil Codner  
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