

GUIDELINES

for

Environmental Preview Report

for the

Foxtrap – Incinerator Road NORM Storage and Decontamination Facility

Honourable Bernard Davis

Minister

Environment and Climate Change

November 22, 2021

Registration No. 2166

ENVIRONMENTAL PREVIEW REPORT GUIDELINES

The following guidelines are intended to assist the proponent with the preparation of the Environmental Preview Report (EPR) for the proposed undertaking. The EPR is a report that presents the results of an investigation based on readily available information that supplements the information provided by the proponent upon registration of the undertaking. The purpose of the information in the EPR is to assist the Minister of Environment and Climate Change in making a determination as to the potential for significant environmental effects from the proposed undertaking and whether an Environmental Impact Statement (EIS) will be required. The EPR is expected to be as concise as possible while presenting the comprehensive information necessary to make an informed decision.

The EPR should include and update the information provided in the original registration document(s) and focus on the information gaps identified during the government and public review of the registration. The EPR should address the information gaps in sufficient detail to enable the Minister of Environment and Climate Change to make an informed decision as to the potential for significant environmental effect from the undertaking.

The contents of the EPR should be organized according to the following format:

1. NAME OF UNDERTAKING:

The undertaking has been assigned the Name *“Foxtrap – Incinerator Road NORM Storage and Decontamination Facility.”*

2. PROPONENT:

Name the proponent and the corporate body, if any, and state the mailing and e-mail address.

Name the chief executive officer if a corporate body, and telephone number, fax number and e-mail address.

Name the principal contact person for purposes of environmental assessment and state the official title, telephone number, fax number and e-mail address.

Please note: the EPR will be posted on the Department’s web page and accessible to the public. Personal contact information such as telephone numbers and mailing addresses can be provided in a separate cover letter that will not be posted on the web page, if preferred.

3. THE UNDERTAKING:

State the nature of the project.

State the purpose/rationale/need for the project. If the proposal is in response to an established need, this should be clearly stated. Identify needs that are immediate as well as potential future needs.

If the project has changed from the original project description in the Environmental Assessment (EA) registration document, clearly identify the proposed changes and state the rationale for the change(s).

4. DESCRIPTION OF THE UNDERTAKING:

Provide a complete overview of the project in the following subsections, including information about the preferred choice of location, design, construction standards, operation and maintenance standards, etc.

4.1 Geographical Location/Physical Components/Existing Environment:

Provide an accurate description of the proposed site, access road, facilities and equipment, including GPS location coordinates. Attach an original base map (1:25,000 scale) and/or recent air photos/aerial imagery.

Provide information regarding ownership and/or zoning of the land upon which the project is to be located and any restrictions imposed by that ownership or zoning, including municipal ownership/zoning, Crown, and private land.

Provide a hydrogeological assessment completed by a qualified professional, which shall include the following information: groundwater flow direction, baseline water quality including radiological parameters outlined in Table 5.1 of Health Canada's NORM Guidelines located here: <https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/canadian-guidelines-management-naturally-occurring-radioactive-materials.html#a5.1>.

4.2 Construction:

State the time period in which proposed construction will proceed (if staged, list each stage and its approximate duration) and proposed date of first physical construction-related activity.

Provide the details, materials, methods, schedule, and location of all planned construction activities.

Provide a detailed site plan showing the proposed NORM storage and decontamination area in relation to your current facilities on site.

Provide detailed information on the proposed storage and decontamination chamber. What material will be used in the construction? Will the storage be above or below ground? How will the NORM material be stored in the storage area? What is the estimated maximum volume of material that will be stored?

4.3 Operation and Maintenance:

All aspects of the operation and maintenance of the proposed development should be presented in detail.

Provide details on the radiation detection and monitoring, as well as a radiation protection plan. Provide details as to how you plan to ensure the application of the "As Low As Reasonably Achievable (ALARA) principle" for all workers to keep radiation exposures as far below the American Conference of Governmental Industrial Hygienists (ACGIH) guidelines as practicable.

Provide details on leak detection and monitoring.

Provide details on surface and groundwater protection. Provide details on how NORM contaminated runoff will be prevented from contaminating the environment.

Provide information on the proposed transportation plan and procedures for material coming to and leaving the site, including any radiation testing prior to accepting the material.

Provide the details of the proposed decontamination process, including but not limited to:

- a) Method of decontamination including previous applications and efficacy of the technology;
- b) Materials and procedures for the collection and storage of wastewater and scale, including details on the storage tank, drums and sump pump collection system;
- c) Mitigation and hazard controls for the decontamination process;
- d) Type of personal protective equipment to be used during the decontamination process; and,
- e) A description of how atmospheric monitoring and filtered ventilation will be address during decontamination;

Provide information on the training requirements for employees at this facility who will be involved with the decontamination and/or storage of the NORM waste.

Provide an emergency response plan.

5. ALTERNATIVES

Alternative means of carrying out the project to meet the stated purpose and rationale must be provided.

The EPR must identify and describe alternative means and locations of carrying out the project that are technically and economically feasible. The following steps for addressing alternative means and locations are recommended:

- f) Identify any alternative means and locations to carry out the project, e.g. other facilities owned by the proponent;
- g) Identify the environmental effects of each alternative means and location;
- h) Identify the **preferred** means and location and provide rationale for selection; and,
- i) Provide reasons for the rejection of alternative sites.

Include information from previous project related studies describing alternate locations that were considered, including the expansion of existing sites, reasons for rejection, and reasons supporting the proposed site as the preferred location, if applicable.

Alternative locations should be clearly outlined on maps of a suitable scale (i.e. 1:50,000, 1:25,000) and aerial imagery.

6. POTENTIAL ENVIRONMENTAL EFFECTS and MITIGATION:

Provide detailed information regarding the potential effects of the project on the environment and the proposed mitigation to be used to avoid adverse environmental effects.

Identify how the project will avoid interference with the rights of other legitimate land owners/users in the Incinerator Road area.

Identify how the project will avoid interference with, and mitigate the effects of the project on, the users of the Recreational Zone near the proposed undertaking location.

Identify the potential effects of the project on nearby residential receptors.

7. DECOMMISSIONING and REHABILITATION:

Describe all aspects of the decommissioning and rehabilitation plans for the project, assuming the eventual need to eliminate the entire project footprint from the landscape.

8. PROJECT- RELATED DOCUMENTS:

Provide a bibliography of all project-related documents already generated by or for the proponent (e.g., feasibility study, engineering reports, etc).

9. PUBLIC INFORMATION MEETING:

An Open House Public Information Session shall be held at a place adjacent to or in the geographical area of the undertaking, or as the minister may determine, in order to:

- a) provide information concerning the undertaking to the people whose environment may be affected by the undertaking;
- b) record and respond to the concerns of the local community regarding the environmental effects of the undertaking; and,
- c) present the information gathered to fulfill the requirements of Section 5 of these guidelines.

The public information session must adhere to all restrictions to mitigate the impacts of COVID-19 that are in place at the time of the session. Information sessions may be conducted by virtual means through a live streaming, video conferencing or teleconferencing process, such as Microsoft Teams, Skype, etc.

You are required to notify the Minister and the public of the scheduled meeting **not fewer than 7 days** before that meeting. Public concerns shall be addressed in a separate section of the EPR.

Protocol for these public sessions will comply with Section 10 of the Environmental Assessment Regulations, 2003. Public notification specifications are outlined in Appendix A.

10. APPROVAL OF THE UNDERTAKING:

List the main permits, licences, approvals, and other forms of authorization required for the undertaking, together with the names of the authorities responsible for issuing them (e.g., federal government department, provincial government department, municipal council, etc.)

You are required to provide one paper copy and an electronic version of the EPR, for posting to the Environmental Assessment website, together with a covering letter to:

Minister
Environment and Climate Change
P.O. Box 8700
St. John's NL A1B 4J6

11. FEE FOR ENVIRONMENTAL ASSESSMENT

Undertakings with an estimated capital cost greater than \$5 million are subject to the Department's fees for environmental assessment found at <https://www.gov.nl.ca/ecc/env-assessment/fees/>. You are required to email an estimate of the capital cost of the undertaking using current standard estimating practices and construction costs, to the following email address:

Director of Environmental Assessment
EAProjectComments@gov.nl.ca

APPENDIX A

Public Notices

Under the provisions of the Environmental Assessment Regulations 2003, Section 10, and where the approved Guidelines require a public information session(s), the following specified public notification requirements must be met by the proponent prior to each meeting:

PUBLIC NOTICE

Public Information Session on the Proposed

Name of undertaking
Location of undertaking

shall be held at
Date and Time
Location

This session shall be conducted by the proponent,
Proponent name and contact phone number or email address,
as part of the environmental assessment for this project.

The purpose of this session is to describe all aspects of the proposed project and the activities associated with it, and to provide an opportunity for interested persons to request information or state their concerns.

ALL ARE WELCOME

MINIMUM INFORMATION CONTENT OF PUBLIC ADVERTISEMENT

- Minimum newspaper ad size: 2 column widths. Minimum posted ad size: 7" x 5"
- Minimum newspaper ad coverage: Weekend preceding meeting and 3 consecutive days prior to meeting date; to be run in newspaper locally distributed within meeting area or newspaper with closest local distribution area.
- Minimum posted ad coverage: Local Town or City website (if permitted), proponent's web site (if applicable), and local community channel (if applicable), to be posted continually for 1 full week prior to meeting date.
- Proponent's webpage, social media sites (optional).