Waste Management Plan – Northeast Arm Recreation Camp, Dunville, NL

1. Project Overview

PSPC is custodian of a former United States Navy (USN) Recreation Camp located in Dunville, Placentia Bay, NL. Constructed in 1943, and abandoned by the USN in 1994, the property consists of eight small cabins and seven support buildings. When title to the property was transferred in 2017 and PSPC began their environmental and legal due diligence, the buildings were in fair to poor condition. Frequent vandalism on the already deteriorating structures has become more frequent in recent years resulting in many of the structures with partially collapsed roofs and floors and easily accessible to site visitors. Hazardous building materials are also present. Attempts to secure the buildings and property has been futile resulting in increased risk to the safety and health of the general public. None of the buildings can be restored and a full scale demolition is required. This project will be tendered on the federal government procurement site, Canada Buys.

2. Project Scope

The scope of work will include the abatement and removal of hazardous and non-hazardous building materials from 15 buildings and subsequent demolition of all structures located at the site, which have been vacant for an extended period of time. Hazardous materials include asbestos, lead/mercury based paint, PCB/Lead/Mercury containing equipment, radioactive elements in smoke detectors, ozone depleting substances and mould. Non hazardous materials includes hardwood flooring, household furniture, cabinetry, household appliances, plywood, stone fireplaces, commercial freezers, wood stoves, steel support floor beams, etc.

3. Objective

This document serves as the *Demolition Waste Management Plan* needed to satisfy the requirements of the Pollution Prevention Division of Environment and Climate Change, NL as well as federal and provincial acts and regulations, sustainability policies and standards for this project.

Specifically, the objective of this plan is to divert and reduce the amount of demolition waste sent to landfill or incineration by collecting, reusing, recycling, and recovering it. Additionally, by separating hazardous waste prior to demolition, where possible, and disposing of it at appropriate licensed waste management facilities, prevention of leachable waste and other contaminants of concern from entering the environment is achieved along with federal and provincial regulatory compliance. As a result, this plan helps reduce land, water and air pollution from landfilling and incineration and promotes sound materials management that reduces the waste of resources. This document outlines the types of hazardous and non-hazardous waste, waste volume estimates,

storage, transport, disposal and documentation required to monitor the implementation of this plan.

4. Summary of Hazardous Materials By Building

BUILDING NAME	CONSTRUCTION DATE	ACCESSIBILITY/CONDITION (July 2025)	ASBESTOS	LEACHABLE LEAD PAINT	PCBs	MERCURY	ODSs	Misc. Hazardous Materials
Building 1001 Pump House	1943	Safe for entry.	Potential ACMs based on asbestos confirmation in buildings with the same construction date: - pipe run insulation: straight run and debris.	None identified.	None identified.	None identified.	None identified.	None identified.
Building 1002 (Camp Attendees Cabin)	1943	Safe for entry.	1) White vinyl floor tile (12" x 12"). 2) Grey vinyl floor tile (12" x 12"). 3) Transite wall board (bathroom). Potential ACMs based on asbestos confirmation in buildings with the same construction date: - pipe run insulation: straight run and debris. - drywall joint compound. - reflective paper - incandescent light fixture.	None identified.	None identified.	None identified.	None identified.	Potential for smoke detector (radioactive substance). Smoke detectors not observed on ceiling, may be in rubble on cabin floor.
Building 1004 Camp Attendees Cabin	1943	Safe for entry.	1) Pipe run insulation: straight run and debris identified in crawlspace. 2) White vinyl floor tile (12" x 12"). 3) Green vinyl floor tile (9" x 9"). 4) Transite wall board (bathroom). 5) Black mastic under flooring. Potential ACMs based on asbestos confirmation in buildings with the same construction date: - drywall joint compound.	None identified.	None identified.	None identified.	None identified.	Potential for smoke detector (radioactive substance). Smoke detectors not observed on ceiling, may be in rubble on cabin floor.

			- reflective paper - incandescent light fixture.					
Building 1008 (Gas Storage Building)	1950s	Safe for entry.	Potential ACMs based on asbestos confirmation in buildings with the same construction date: - roofing materials (not sampled).	None identified.	None identified.	None identified.	None identified.	None identified.
Building 1011 (Crew Quarter's Building)	1943	Safe for entry.	1) Drywall joint compound. 2) Brown vinyl floor tile (12" x 12"). 3) Green vinyl floor tile (12" x 12"). 4) Light brown vinyl floor tile (12" x 12"). 5) Green vinyl floor tile (9" x 9"). Potential ACMs based on asbestos confirmation in buildings with the same construction date: - pipe run insulation: straight run and debris. - roofing materials (not sampled).	White paint on wood moulding (interior).	None identified.	None identified.	None identified.	None identified.
Building 1012 Camp Attendees Cabin	1943	Safe for entry.	1) White vinyl floor tile (12" x 12"). 2) Green vinyl floor tile (9" x 9"). 3) Transite wall board (bathroom). Potential ACMs based on asbestos confirmation in buildings with the same construction date: - pipe run insulation: straight run and debris. - drywall joint compound. - reflective paper - incandescent light fixture.	None identified.	None identified.	None identified.	None identified.	None identified.
Building 1013 Camp Attendees Cabin	1943	Safe for entry. Possible bee hive near entrance (right hand side when looking at door from interior).	1) Transite wall board (bathroom). Potential ACMs based on asbestos confirmation in buildings with the same construction date:	None identified.	None identified.	None identified.	Residential refigerator. Fire extinguisher.	Smoke detector (radioactive substance).

			- pipe run insulation: straight run and debris.					
Building 1014 Camp Attendees Cabin	1943	Not safe for entry; floor damaged at front of cabin.	1) Transite wall board (bathroom). Potential ACMs based on asbestos confirmation in buildings with the same construction date: - pipe run insulation: straight run and debris. - drywall joint compound. - reflective paper - incandescent light fixture.	None identified.	None identified.	None identified.		Potential for smoke detector (radioactive substance). Smoke detectors not observed on ceiling, may be in rubble on cabin floor.
Building 1016 (Caretaker's Residence)	1943	Safe for entry; however, part of accessway is not stable.	1) Drywall joint compound. 2) Brown vinyl floor tile (12" x 12"). 3) Green vinyl floor tile (12" x 12" and 9" x 9"). 4) White vinyl floor tiles (12" x 12" and 9" x 9"). 5) Grey vinyl floor tile (12" x 12"). 6) Black vinyl floor tile (12" x 12"). 7) Blue vinyl flooring. 8) Brown vinyl flooring. 9) Tan vinyl flooring. 10) Black mastic beneath flooring. 11) Window caulking (yellow) - building interior, main entrance. 12) Shingles and roof felt. 13) Transite siding (exterior). Potential ACMs based on asbestos confirmation in buildings with the same construction date: - pipe run insulation: straight run and debris.	Multiple colors - light blue, beige brown on transite siding (exterior).	Fluorscent light ballasts.	Fluorscent light tubes.	None identified.	None identified.
Building 1017 (Maintenance Building)	1943	Safe for entry.	1) Green vinyl floor tile (12" x 12"). 2) Black tar paper under siding on exterior wall. 3) Transite siding	None identified.	Fluorscent light ballasts.	Fluorscent light tubes.	Commercial refrigerators (3). Residential refrigerator. Ice maker.	None identified.

			(exterior). 4) Black mastic under floor tile					
Building 1018 (Lodge)	1984	Safe for entry.	1) Brown vinyl floor tile (12" x 12"). 2) Roofing tar (mastic).	None identified.	Fluorscent light ballasts.	Fluorscent light tubes.	Residential refigerator.	Emergency light fixture may contain lead battery. Battery missing, may be in rubble on floor.
Building 1019 (Boat House)	1950s		None identified.	None identified.	None identified.	None identified.	None identified.	None identified.
Building 1024 Camp Attendees Cabin	1963	Safe for entry.	1) Drywall joint compound. 2) Reflective paper - incandescent light fixture.	None identified.	None identified.	None identified.	Residential refigerator.	None identified.
Building 1027 Camp Attendees Cabin	1964	Safe for entry.	None identified.	Multiple paint colors (brown, light blue, grey) - kitchen bar (interior).	None identified.	None identified.	Residential refigerator.	None identified.
Building 1028 Camp Attendees Cabin	1964	Safe for entry.	None identified.	None identified.	None identified.	None identified.	None identified.	None identified.

Notes:

1) Hazardous materials identified are based on hazardous materials assessments completed by Englobe (2019) and Weston (1990).

2) Due to safety concerns at the time of the 2019 assessment, not all buildings were accessed and potential ACMs have been identified based on construction date

3) Similar hazardous materials may be observed in other buildings but unless otherwise noted above, material is not considered to be a potential hazardous material based on sampling results.

5. Summary of Non Hazardous Materials to Be Recycled or Reused

BUILDING NAME	CONSTRUCTION DATE	ACCESSIBILITY/CONDITION (July 2025)	Non Hazardous Materials
Building 1001 Pump House	1943	Safe for entry.	Two pipes (fiberglass and metal) leading from Pump House to rivers edge. Pipes are to be cut off at shoreline and capped. No removal activity at water's edge.
Building 1002 (Camp Attendees Cabin)	1943	Safe for entry.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks, and various pieces of wooden furniture (bunk beds, bureaus, cabinets) and toilet

Building 1004 Camp Attendees Cabin	1943	Safe for entry.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks and various pieces of wooden furniture (bunk beds, bureaus,cabinets) and toilet
Building 1008 (Gas Storage Building)	1950s	Safe for entry.	None identified.
Building 1011 (Crew Quarter's Building)	1943	Safe for entry.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank.
Building 1012 Camp Attendees Cabin	1943	Safe for entry.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks and various pieces of wooden furniture (bunk beds, bureaus, cabinets) and toilet
Building 1013 Camp Attendees Cabin	1943	Safe for entry. Possible bee hive near entrance (right hand side when looking at door from interior).	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks and various pieces of wooden furniture (bunk beds, bureaus, cabinets) and toilet
Building 1014 Camp Attendees Cabin	1943	Not safe for entry; floor damaged at front of cabin.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks and various pieces of wooden furniture (bunk beds, bureaus, cabinets) and toilet

Building 1016 (Caretaker's Residence)	1943	Safe for entry; however, part of accessway is not stable.	Residence has some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks, dryer, and various pieces of furniture (sofa, recliners, beds, bureaus, cabinets) bathtub/shower and toilet.
Building 1017 (Maintenance Building)	1943	Safe for entry.	Multiple pieces of metal debris: commercial fridges, work benches, ice maker, residential fridge, wood stove, hot water tank, light fixtures with ballasts.
Building 1018 (Lodge)	1984	Safe for entry.	Lodge contains come metal debris inside: kitchen stove, fridge, hot water tank, sinks, furnace, boiler, expansion tank, wooden furniture, and bathroom stalls with toilets and showers.
Building 1019 (Boat House)	1950s		None identified.
Building 1024 Camp Attendees Cabin	1963	Safe for entry.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks and various pieces of wooden furniture (bunk beds, bureaus, cabinets) and toilet
Building 1027 Camp Attendees Cabin	1964	Safe for entry.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks and various pieces of wooden furniture (bunk beds, bureaus, cabinets) and toilet
Building 1028 Camp Attendees Cabin	1964	Safe for entry.	Cabins have some metal debris inside: wood stove, kitchen stove, fridge, hot water tank, sinks and various pieces of wooden furniture (bunk beds, bureaus, cabinets) and toilet

Mandatory Recycling Streams:

- Metals: piping, fixtures, structural components
- Concrete/Masonry: reuse as structural fill

- Wood: clean dimensional wood
- Cardboard/Paper: packaging
- Plastic: packaging and fixtures
- Glass: windows, fixtures

Salvageable/Reusable Items:

-Fixtures, doors, hardwood flooring, cabinetry (if structurally sound and uncontaminated)

6. Disposal Plan

A designated Waste Management Coordinator (WMC), defined as the Contractor representative, will create their own Waste Management Plan in addition to coordinating in advance with the approved landfill to arrange for the acceptance of demolition debris that cannot be recycled or reused, hazardous building materials and mixed hazardous waste. Below is the description, condition and quantities as well as the handling and disposal criteria for all types of hazardous materials found at the NEAC property.

HAZARDOUS MATERIALS	DESCRIPTION	CONDITION	ESTIMATED QUANTITY	HANDLING / DISPOSAL
Asbestos	**PIPE INSULATION**			All ACMs must be handled and disposed in accordance with *NL Asbestos Abatement Regulation 111/98*. Asbestos waste must be disposed at an approved municipal landfill disposal site. Asbestos abatement must be completed by a certified asbestos abatement contractor. Asbestos is classified as a hazardous material under the *Transportation of Dangerous Goods Act (TDGA)*, by Transport Canada and has specific requirements for transfer (i.e. manifests, placards, etc.). Material must be transported by an operator holding a valid Certificate of Approval under the *NL Waste Material*
	Pipe insulation, straight run and debris identified in the crawlspace, Enlisted Men's Cabin (Building 1004-Camp Attendees Cabin (Englobe 2018)).	Observed by Weston.	Approximately 9.2 m (linear) and 3 m^2.	
	DRYWALL AND DRYWALL JOINT COMPOUND			
	Walls and ceilings of the Crew Quarters Bldg., the Caretaker's Residence and the Camp Attendees Cabin C (Bldgs. 1011, 1016 and 1024).	Observed by Englobe. POOR to GOOD	Approx. 670 m_2.	
	Vinyl Flooring			

	12”x12” vinyl tile, brown located in the Crew Quarters Building as well as observed in the Camp Attendees Bldgs. A, B, and C (Bldgs. 1011, 1027, 1013 and 1024). 9”x9” vinyl tile, green located in the Crew Quarters Building (Bldg. 1011). 9”x9” vinyl tile, white located in the Crew Quarters Building (Bldg. 1011).	Observed by Englobe. GOOD	Approx. 100 m^2 (12”x12” vinyl tile, brown observed during the survey) Approx. 35 m^2 (9”x9” and 12”x12” vinyl tile in Building 1011).	*Disposal Act.*
	12”x12” vinyl floor tile, light brown with dark brown and orange streaks located in the Crew Quarters Building (Bldg. 1011).			
	Seamless vinyl flooring, blue located in the Caretaker’s Residence (Bldg. 1016). Vinyl tile, white located in the Caretaker’s Residence (Bldg. 1016). Vinyl tile, black located in the Caretaker’s Residence (Bldg. 1016).	Observed by Englobe. GOOD	Approx. 5 m^2.	
	12”x12” floor tile, brown located in the Recreation Pavilion (Bldg. 1020) (i.e. Bldg. 1018-Lodge (Englobe 2018)).	Observed by Weston.	Approx. 9 m^2.	
	12”x12” floor tile, green located in the Garage and Workshop (Bldg. 1017-Maintenance Bldg. (Englobe 2018)).	Observed by Weston.	Approx. 9 m^2.	
	12”x12” floor tile, white located in an Enlisted Men’s Cabin (Bldg. 1002-Camp Attendees Cabin (Englobe 2018)). 12”x12” floor tile, grey located in an Enlisted Men’s Cabin (Bldg. 1002-Camp Attendees Cabin (Englobe 2018))	Observed by Weston.	Approx. 37 m^2.	

	12”x12” floor tile, white located in an Officer Cabin (Bldg. 1012-Camp Attendees Cabin (Englobe 2018)). 9”x9” floor tile, green located in an Officer Cabin (Bldg. 1012-Camp Attendees Cabin (Englobe 2018)).	Observed by Weston.	Approx. 79 m^2.	
	9”x9” floor tile, green located in an Enlisted Men’s Cabin (Bldg. 1004-Camp Attendees Cabin (Englobe 2018)). 12”x12” floor tile, white located in an Enlisted Men’s Cabin (Bldg. 1004-Camp Attendees Cabin (Englobe 2018)).	Observed by Weston.	Approx. 80 m^2.	
	12”x12” floor tile, brown located in the Caretaker’s Residence (Bldg. 1016). Vinyl flooring, brown located in the Caretaker’s Residence (Bldg. 1016). Vinyl flooring, tan located in the Caretaker’s Residence (Bldg. 1016). 12”x12” floor tile, gray located in the Caretaker’s Residence (Bldg. 1016). Unspecified size, floor tile, green located in the Caretaker’s Residence (Bldg. 1016).	Observed by Weston.	Approx. 53 m^2.	
	Sealants/Caulking			
	Interior window caulking, yellow located in the main entrance of the Caretaker’s Residence (Bldg. 1016).	Observed by Englobe. Good	Approx. 2 m (linear).	
	Mastic			
	Mastic, black, obtained from beneath the vinyl flooring located in the bathroom of the Caretaker’s Residence (Bldg. 1016).	Observed by Englobe. Good	Approx. 4.5 m^2.	

Mastic, black, obtained beneath roof shingles of the Recreation Pavilion (Bldg. 1020) (i.e. Bldg. 1018-Lodge (Englobe 2018)).	Observed by Weston.	Approx. 167 m^2.
Mastic, black, obtained from beneath the vinyl tile located in the storage room of the Garage and Workshop (Bldg. 1017-Maintenance Building).	Observed by Weston.	Approx. 9.7 m^2.
Mastic, black, obtained from beneath the vinyl tile located in the living space of an Enlisted Men's Cabin (Bldg. 1004).	Observed by Weston.	Approx. 74 m^2.
Mastic, black, obtained from beneath the floor tiles located in the living space of the Caretaker's Residence (Bldg. 1016).	Observed by Weston.	Approx. 26 m^2.
Roofing Materials and Felt/Tar Paper		
Mastic, black, obtained from beneath roof shingles of the Recreation Pavilion (Bldg. 1020) (i.e. Bldg. 1018-Lodge (Englobe 2018)). *Identified above in Mastic Section.	Observed by Weston and Englobe. GOOD	Approx. 4 m^2.
Tar paper, black, obtained from beneath siding located on exterior walls of the Garage and Workshop (Bldg. 1017-Maintenance Bldg. (Englobe 2018)).	Observed by Weston and Englobe. GOOD	Approx. 112 m^2.
Roof felt, black, obtained from the roof of the Caretaker's Residence (Bldg. 1016). Shingle, black, obtained from the roof of the Caretaker's Residence (Bldg. 1016).	Observed by Weston and Englobe. GOOD	Approx. 84 m^2.
Reflective Paper		
Reflective paper obtained from incandescent light fixture located in the kitchen of an Officer's Cabin (Bldg. 1024-Camp Attendees Cabin C (Englobe 2018)).	Observed by Englobe. GOOD	One (1) light fixture
Transite		

	Transite siding, gray, obtained from the Garage and Workshop (Bldg. 1017–Maintenance Bldg. (Englobe 2018)).	Observed by Weston and Englobe. FAIR	Approx. 112 m^2.	
	Transite, gray, obtained from bathroom walls of an Enlisted Men's Cabin (Bldg. 1002-Camp Attendees Cabin (Englobe 2018)).	Observed by Weston.	Approx. 10 m^2.	
	Transite, gray, obtained from bathroom walls of an Officer Cabin (Bldg. 1012-Camp Attendees Cabin (Englobe 2018)).	Observed by Weston.	Approx. 20 m^2.	
	Transite, yellow, obtained from bathroom walls of an Officer Cabin (Bldg. 1014-Camp Attendees Cabin (Englobe 2018)).	Observed by Weston.	Approx. 20 m^2.	
	Transite, yellow, obtained from bathroom walls of an Enlisted Men's Cabin (Bldg. 1004-Camp Attendees Cabin (Englobe 2018)).	Observed by Weston.	Approx. 17 m^2.	
	Transite, yellow, obtained from bathroom walls of an Officer Cabin (Bldg. 1013-Camp Attendees Cabin B (Englobe 2018)).	Observed by Weston and Englobe. GOOD	Approx. 15 m^2.	
	Transite siding, obtained from the Caretaker's Residence (Bldg. 1016).	Observed by Weston and Englobe. FAIR	Approx. 140 m^2.	
	Blue paint on plywood wall, interior, located in the small room of the Crew Quarters Building (Bldg. 1011).	POOR (flaking)	Approx. 30 m^2.	Any disturbance or removal of metal-containing painted materials that may generate dust or respirable aerosols, will need to conform to the federal and provincial OHSA Regulations. All work should be carried out by individuals qualified to handle metals-containing materials and will require, as a minimum, workers to wear proper PPE (respirators, disposable clothing,
	Black paint on wood siding, exterior, located on the wall of the Crew Quarters Building (Bldg. 1011).	POOR (flaking)	Approx. 25 m^2.	
	Aqua/light green paint on wood siding, exterior, located beneath the transite on the Caretaker's Residence (Bldg. 1016).	POOR (flaking)	Approx. 170 m^2.	

Lead/Mercury/ Containing Paint	Yellow/green/blue/beige paint on plywood wall, interior, located on the kitchen wall of the Caretaker's Residence (Bldg. 1016).	GOOD	Approx. 75 m^2.	etc.).
	White paint on wood eave, exterior, located on the Garage and Workshop (Bldg. 1017-Maintenance Bldg. (Englobe 2018)).	POOR (flaking)	Approx. 16 m^2.	Leachable lead/mercury paint and PCB solids must be treated as hazardous wastes for handling and disposal out of province. Transporters of hazardous waste shall have an approval issued by MAE, and shipping documentation for Transport Canada and Environment Canada will be required. Completed waste
	Green paint on plywood floor, interior, located in the Garage and Workshop (Bldg. 1017-Maintenance Bldg. (Englobe 2018)).	POOR (water damaged, flaking)	Approx. 87 m^2.	
	Green paint on plywood wall, exterior on the Crew Quarters Building (Bldg. 1011).	POOR (flaking)	Approx. 20 m^2.	manifests shall be submitted to MAE prior to the shipment of hazardous wastes.
	White paint on wood mouldings, interior located in the Crew Quarters Building (Bldg. 1011). (Also exceeds MAE Disposal Regulations for Leachate).	POOR (flaking)	Approx. 5 m^2.	
	Brown/light blue/grey paint on wood, interior located in the Camp Attendees Cabin A (Bldg. 1027). (Also exceeds MAE Disposal Regulations for Leachate).	POOR (flaking)	Approx. 5 m^2.	
	Light blue/beige/brown paint on transite siding, exterior located on the Caretaker's Residence (Bldg. 1016). (Also exceeds MAE Disposal Regulations for Leachate).	POOR (flaking)	Approx. 170 m^2.	
	Pink/yellowish-orange/light blue/beige paint on plywood wall, interior located in the Caretaker's Residence (Bldg. 1016).	GOOD	Approx. 130 m^2.	

PCBs in Equipment	Fluorescent light ballasts and pole mounted transformers.	Based on the age of buildings, ballasts and transformers may contain PCBs. The inspection of fluorescent light ballasts and transformers was not included in the scope of work.	Approx. sixteen (16) ballasts located in the Maintenance Bldg. (Bldg. 1017), the Lodge (Bldg. 1018) and the Caretaker's Residence (Bldg. 1016).Approx. three (3) potential PCB containing pole mounted transformers.	The serial numbers of fluorescent light ballasts should be compared to Environment Canada's document *EPS 2/CC/2* (August 1991) to confirm as PCB or non-PCB - containing. Fluorescent light ballasts that contain PCBs cannot be disposed of with other solid waste. PCB-containing ballasts must be disposed of through a licensed hazardous waste disposal contractor or taken to a licensed recycling facility.
Microbial Growth	Water damaged building materials.	Potentially harmful to inhabitants or workers.	Observed in all buildings surveyed by Englobe personnel at the NEAC.	Mould must be remediated by a qualified mould abatement contractor, and the cause of the mould remedied. When removing materials containing mould, the Canadian Construction Association document CCA 82-2004 should be followed. This document provides three (3) levels of remediation depending on the size or scale of the mould growth, as well as considerations for building demolition. Mould impacted materials must be disposed at an approved municipal landfill.
Animal Feces	Building materials impacted with animal feces.	Potentially harmful to inhabitants/ workers.	Observed in all buildings surveyed by Englobe except the Camp Attendees Cabin C (Bldg. 1024).	Building materials impacted by animal feces should undergo wetting techniques prior to handling. Proper PPE should be worn by workers at all times. Building materials contaminated with animal feces may be disposed of at any municipal landfill, provided they do not contain unacceptable levels of other hazardous materials (e.g., metals-based paint, asbestos, etc.).

Mercury	Fluorescent light tubes.	Contain mercury vapour.	Approximately thirty-two (32) located in the Maintenance Bldg. (Bldg. 1017), the Lodge (Bldg. 1018) and the Caretaker's Residence (Bldg. 1016).	Mercury vapour-containing light tubes should be disposed according to the *Canada Wide Standard for Mercury-Containing Lamps* (May 2001). Units should be handled carefully to ensure that they are not broken, and then carefully packaged in suitable boxes for recycle or disposal. Mercury vapour-containing light tubes are considered a hazardous waste and should be disposed at a licensed disposal facility.
Radioactive Materials	Smoke detectors.	May contain radioactive elements.	Approx. one (1) located in the Camp Attendees Cabin B (Bldg. 1013).	Smoke detectors are exempt from the Canadian Nuclear Safety Commission (CNSC) Packaging and Transport of Nuclear Substances Regulations SOR 208/2000, Nuclear Safety and Control Act and therefore require no special handling or transportation considerations. At the time of disposal, smoke detectors containing radioactive material should be sent back to the manufacturer or to a licensed disposal facility.
Lead/Lithium Batteries	Emergency lighting and vehicle batteries.	May contain lead/lithium.	Approx. one (1) vehicle battery located in the Maintenance Bldg. (Bldg. 1017) and one (1) emergency lighting system in the Lodge (Bldg. 1018).	Materials must be manifested as a Dangerous Good and requires disposal at an approved disposal facility.
Lead Piping	All copper piping should be assumed to contain lead in the joint solder. Lead is also common to bell fitting joints for cast iron drainage piping, wire connectors, electrical cable sheathing, and other electrical applications.	N/A	Not quantified.	These materials, if present, must be recycled or disposed of at an approved facility that accepts this waste.

ODS	Household refrigerators, water coolers and fire extinguishers may contain ODS.	May contain ODS.	Three (3) commercial refrigerators, two (2) residential refrigerators and one (1) ice maker located in the Maintenance Building (Bldg. 1017).	Refrigeration units should be checked to confirm the presence of refrigerant prior to disposal. The *NL Ozone Depleting Substance Regulations,* Canadian Council of Ministers of the Environment (CCME) *National Action Plan for the Environmental Control of Ozone Depleting Substances (ODS) and their Halocarbon Alternatives, Canadian Environmental Protection Act* (CEPA) *Ozone Depleting Substances Regulations* and the *Federal Halocarbon Regulations* stipulate stringent control of ozone-depleting substances and any unit containing CFCs/halocarbons must
			One (1) residential refrigerator located in the Lodge (Bldg. 1018).	
			One (1) residential refrigerator located in the Camp Attendees Cabin A (Bldg. 1027).	
			One (1) residential refrigerator and one (1) fire extinguisher located in the Camp Attendees Cabin B (Bldg. 1013).	
			One (1) residential refrigerator located in the Camp Attendees Cabin C (Bldg. 1024).	
			Cabins not accessed may also contain an unknown quantity of ODS containing equipment.	be maintained or recharged by a licensed CFC/halocarbon handler. Disposal of units containing ODS should be completed by a certified air conditioning/refrigeration *Ozone Depleting Substance Regulations*.
Silica	All concrete components of the subject buildings.	Freshly-cleaved crystalline silica may be formed when pulverized.	Not quantified.	The concrete, clay products and associated mortar may be disposed of at a Construction & Demolition (C&D) debris site if disposal is required; however, construction disturbances such as cutting, breaking or pulverizing of silica-containing products may result in exposure to airborne silica. Appropriate hygiene and personal protection measures must be developed and employed to ensure that the American Conference of

				Governmental Industrial Hygienists (ACGIH) exposure criteria for silica is not exceeded (0.025 mg/m^3) if work with these materials is to be conducted.

*Note: Hazardous materials including mixed waste will require disposal at the City of St. John's Robin Hood Bay Waste Management Facility. The WMC is responsible for scheduling the acceptance of hazardous materials with the landfill. Disposal shall occur only on the designated day(s) permitted by the approved landfill, and the WMC shall schedule transport accordingly. Currently, hazardous waste disposal at the approved landfill is limited to Thursdays from 8am-2pm. Any requests to dispose of hazardous wastes outside of this time would be considered on a case-by-case basis by the landfill operator along with stipulations for the hauler to provide their own fill and equipment to ensure immediate covering of the hazardous waste, as required by landfill operating procedures. The WMC is responsible for making alternate arrangements with the approved landfill outside of their designated day and time.

7. Storage and Disposal of Waste

Hazardous and Regulated Waste

1.) Asbestos-containing materials (ACM) –Asbestos waste will be placed in sealed double thickness 6 mils bags or similar double lined bins and labelled with appropriate warning labels. ACM will be transported and disposed of at the Robinhood Bay Waste Management Facility in St. John's, NL, with prior approval from facility operator.

2.) Lead/Mercury based paints – Lead and/or Mercury based paints exceeding Surface Coating Material Regulations and confirmed to be non-leachable for Lead and Mercury, will be bagged and sealed in double thickness 0.15 mm bags to prevent potential leaching of lead/mercury based paint Bagged waste will be stored in double lined leak proof bins and labelled with appropriate warning labels. Storage of lead and/or Mercury based paint waste generated by removal activities must comply with Federal, Provincial, and Municipal regulations. Manifests describing and listing waste created will be provided. Lead and/or Mercury based paint waste will be disposed of at the Robinhood Bay Waste Management Facility in St. John's, NL without any other special disposal considerations except for the following:

i. Any painted asbestos-containing material must be abated/removed and disposed according to maximum precautions for asbestos-containing materials.

ii. Painted building materials containing leachable lead that don't contain ACMs can be accepted as special/hazardous waste at Robin Hood Bay Landfill and will be bagged/sealed to prevent potential leaching of lead-paint. If the area of work is not safe to access and the leachable lead painted material is part of the general demolition debris then it must be treated as mixed hazardous waste.

3.) Lead and/or Lithium containing equipment – in emergency lighting will be stored separately from piping, solder, and other electrical applications in appropriate storage bins on site and covered. Lead or Lithium batteries must be manifested as a Dangerous Good and requires disposal at an approved disposal facility. Other lead containing equipment /materials must be recycled or disposed of at an approved facility that accepts this waste.

4.) PCB ballasts and /or PCB containing equipment(pole mount transformers) – Fluorescent light ballasts and pole-mounted transformers that may contain polychlorinated biphenyls (PCBs) were identified in some of the site buildings and should be treated as PCB-containing wastes unless individually inspected prior to disposal at a licensed hazardous waste facility. The serial numbers of fluorescent light ballasts should be compared to Environment Canada's document *EPS 2/CC/2* (August 1991) to confirm as PCB or non-PCB -containing. Labels and serial numbers on transformers identify whether PCB containing fluids or not. Fluorescent light ballasts and/or transformers that contain PCBs cannot be disposed of with other solid waste and so must be stored separately. PCB-containing ballasts and/or transformers must be disposed of through a licensed hazardous waste disposal contractor or taken to a licensed recycling facility out of province.

5.) Mercury containing fluorescent tubes and/or equipment - Mercury vapour-containing light tubes and/or Mercury-containing devices should be handled carefully to ensure that they are not broken, and then carefully packaged in suitable boxes and stored in appropriate covered containers on site. Once safely packaged and ready for disposal, they can be recycled or disposed of according to the *Canada Wide Standard for Mercury-Containing Lamps* (May 2001). Mercury vapour-containing light tubes and/or devices are considered a hazardous waste and should be disposed of through a licensed hazardous waste disposal contractor or recycling facility to prevent the uncontrolled release of mercury.

6.) Radioactive materials in smoke detectors - Smoke detectors are exempt from the Canadian Nuclear Safety Commission (CNSC) Packaging and Transport of Nuclear Substances Regulations SOR 208/2000, Nuclear Safety and Control Act and therefore require no special handling or transportation considerations. At the time of disposal, smoke detectors containing radioactive material should be sent back to the manufacturer or to a licensed disposal facility.

6.) Creosote Timbers- Creosote-treated materials shall be considered hazardous waste and managed in accordance with all applicable federal, provincial, and municipal regulations. Creosote-treated timbers will be segregated from other demolition debris to prevent cross-contamination. Timbers shall be handled using appropriate personal protective equipment (PPE) to minimize worker exposure to hazardous substances. Stockpiling of creosote-treated timbers on-site shall be minimized, and they shall be stored on an impermeable surface or contained to prevent leaching into the soil. Disposal of creosote-treated timbers shall be conducted at an approved disposal facility permitted to accept such materials.

7.) Mould contaminated materials – General demolition waste will be stored in appropriate waste containers unless asbestos is present which would require asbestos waste storage. Mould contaminated materials will be disposed of at an approved landfill that accepts such waste. Mould-

contaminated materials will be handled carefully to minimize dust and spore release and will be properly contained on site to prevent further contamination.

8.) Ozone Depleting Substances - Refrigeration units will be checked to confirm the presence of refrigerant prior to disposal and stored based on presence/absence. The *NL Ozone Depleting Substance Regulations,* Canadian Council of Ministers of the Environment (CCME) *National Action Plan for the Environmental Control of Ozone Depleting Substances (ODS) and their Halocarbon Alternatives, Canadian Environmental Protection Act* (CEPA) *Ozone Depleting Substances Regulations* and the *Federal Halocarbon Regulations* stipulate stringent control of ozone-depleting substances and any unit containing CFCs/halocarbons. Units containing ODS should be disposed of by a certified air conditioning/refrigeration technician in accordance with the *NL Ozone Depleting Substance Regulations* and at an approved facility or recycler that accepts this waste.

Non-Hazardous/Recyclable/Reusable Materials:

Most of the buildings at the property contain metal debris including wood stoves, kitchen stoves, fridges, hot water tanks, toilets, sinks and various pieces of wooden furniture such as bunk beds, bureaus, cabinets as well as hardwood flooring. These materials will be separated and stored in appropriate, clearly marked bins for reuse and recycling, where possible. Other materials such as packaging materials, paper, plastic, polystyrene, corrugated cardboard, etc, will be collected, separated and disposed of at appropriate recycling facilities in accordance with the Waste Management Plan. Waste materials and recyclables will be removed from work areas, separated, and deposited in designated containers at end of each working day and sent to recyclers from the site at regular intervals.

8. Transport of Waste

Hazardous and Regulated Waste

When hazardous waste is generated on site, transportation and disposal will be coordinated by the Contractor with the Departmental Representative and will comply with applicable federal, provincial and municipal laws and regulations for generators of hazardous waste. Licensed carriers authorized by provincial authorities to accept subject material will be utilized. Before hazardous waste materials are shipped, written notice will be obtained by the Contractor from the intended hazardous waste treatment or disposal facility that it will accept material and is licensed to accept this material. Containers will be labelled with legible, visible safety marks as prescribed by federal and provincial regulations and only trained personnel will handle, offer for transport, or transport dangerous goods. Photocopies of shipping documents and waste manifests will be provided to the Departmental Representative and receipt of completed manifest from consignee after shipping dangerous goods will be tracked. Photocopies of completed manifest will be provided by the Contractor to the Departmental Representative. Any discharge, emission, or escape of hazardous materials will be reported immediately to the Departmental Representative and appropriate provincial authority and reasonable measures to control release will be actioned. Personnel working on site will be confirmed to have been trained in accordance with Workplace Hazardous Materials Information System (WHMIS) requirements. Spills or accidents will be reported

immediately to the Departmental Representative and a written spill report will be submitted to the Departmental Representative within 24 hours of incident. All hazardous waste bins shall be securely covered and transported directly to the approved landfill upon completion of demolition. Hazardous materials and wastes will be transported in accordance with Transportation of Dangerous Goods Act, Transportation of Dangerous Goods Regulations, and applicable provincial regulations.

Non Hazardous/Recyclable/Reusable Waste

Waste materials and recyclables will be disposed of at appropriate municipal landfills and recycling facilities in accordance with applicable regulatory requirements. Such waste will not be burned or buried on site or elsewhere. Volatile and other liquid waste such as mineral spirits, oil, paints and other coating materials, paint thinners, cleaners, and similar materials will be disposed of appropriately, i.e not on the ground, in waterways, or in storm or sanitary sewers and separated from dry waste materials. Such waste materials will be collected in appropriate covered containers, promptly remove from the site and disposed of at recycling facilities or as otherwise permitted by applicable regulatory requirements. Dry waste materials will be covered and/or wetted down to prevent blowing dust and debris during removal and transport.

9. Implementation Strategy

A designated Waste Management Coordinator (WMC), defined as the Contractor representative, is responsible for supervising waste management activities and required submittal and reporting requirements, in addition to coordinating:

- Source Separation: On-site bins for each material stream
- Documentation: Waybills, weigh tickets, photos, Waste Tracking Forms
- Monitoring: Monthly Waste Reduction Progress Reports
- Training: On-site instruction for subcontractors and workers
- Security: Lockable bins, signage, restricted access

The consultant on site overseeing the project, representing PSPC, will also ensure that this implementation strategy is followed and will report regularly to the PSPC Project Manager on waste management status.

10. Risk Mitigation Strategies

To ensure the safe and environmentally responsible execution of the Waste Management Plan, the following risk mitigation strategies are implemented:

1. Hazardous Materials Management:
   - All asbestos-containing materials, lead-based paints, lead containing equipment, PCB ballasts, mercury tubes, halocarbon/ozone depleting substances and mould-impacted materials will be handled by certified abatement contractors.
   - Workers will be trained in the safe handling, packaging, storage and transportation of hazardous

materials and provide certifications affirming qualifications.
- Personal protective equipment (PPE) will be mandatory for all personnel involved in hazardous material removal.
- Materials will be transported to licensed disposal facilities with proper documentation including waybills and disposal certificates.

2. Site Security and Public Safety:
- Lockable waste bins and restricted access zones will be established to prevent unauthorized entry and exposure to hazardous materials.
- Signage will be installed to warn of potential hazards and direct personnel to safe areas.
- Demolition of structurally compromised buildings will be prioritized to eliminate safety risks.

3. Documentation and Compliance:
- All waste handling activities will be documented using Waste Tracking Forms, weigh tickets, and photographic evidence, ensured by the Consultant overseeing the work.
- Monthly Waste Reduction Progress Reports will be submitted to the Departmental Representative.
- Compliance with provincial and federal environmental regulations will be strictly enforced.

These strategies aim to minimize environmental impact, protect human health, and ensure regulatory compliance throughout the project lifecycle.

SITE PLAN – Proposed Waste Storage Area (in red)