

Operations Regulatory Compliance

Closed Report - CV1920-165 - 28 April 2020

Event Type

Field
Inspection

CV Event Number

CV1920-165

Selected Related Events

- CV1920-155
- CV2021-184

Project Companies

- Trans Mountain Pipeline ULC

Name of the Operating Company

Trans Mountain
Pipeline ULC

Rationale, Scope, and Additional Description

Environmentally focused field inspection of the Trans Mountain Expansion Project's (TMEP), Spread 2, which spans from Edmonton City limits, and extends to a point near Hinton, AB; ranging approximately 288 kilometers, and parallels Alberta Highway-16. The spread moves through the Boreal Forest Natural Region and the Foothills Natural Region, which is characterized by Central Mixed-wood and Dry Mixed-wood sub-regions of Alberta. The Inspection Officer was accompanied by two Indigenous Monitors representing the Indigenous Advisory and Monitoring Committee (IAMC), pursuant to subsection 102 (5) of the Canadian Energy Regulator Act (CERA). The inspection targeted ongoing work activities on the Right-of-Way (ROW) and temporary work spaces (TWS), including Access Roads to the ROW. Other areas of interest included wildlife mitigation, wetland and watercourse crossings, waste management, storage and handling of hazardous materials, traditional land & resource use, heritage resource sites, invasive species and biosecurity management, and erosion and sediment controls.

Selected Province/Territory

- Alberta

Start Date

2020-02-18

End Date

2020-02-21

Inspection Officer Number

- 2864

Selected Disciplines

- Environmental Protection
- IAMC Observation

Tool Used:

- Corrected Non-compliance (CNC) (2)
 - Notice of Non-compliance (NNC) (1)
-

This inspection was undertaken to verify compliance with the following legislative requirements:

- National Energy Board Act (NEBA)
 - National Energy Board Onshore Pipeline Regulations (OPR)
- Canadian Energy Regulator Act (CERA)
 - Canadian Energy Regulator Act (CERA)
- Standards
 - CSA Z662-19 - Oil and Gas Pipeline Systems
- Plans And Procedures
 - Project-specific Environmental Protection Plan (EPP)
 - Pipeline Environmental Protection Plan For The Trans Mountain ULC Trans Mountain Expansion Project. Condition 72. September 2019.

Selected Regulatory Instrument Numbers

- OC-065

Facility Details**Facility Types**

Pipeline

- Pipeline right of way (ROW)

Life-cycle Phases

- Construction

Additional Information**Selected Facilities**

- TRANS MOUNTAIN EXPANSION PROJECT (Pipeline)
-

Observations (No follow-up required)**General Observations: Right-of-Way****Date**

2020-02-19

Discipline

Environmental Protection

Categories

- Soils and Soil Productivity
 - Soil Handling
 - Biosecurity
- Surface Water Management
 - Containment and Drainage Structures
- Water Bodies - Non-Fish-bearing

- Temporary Access Structures
- Water Bodies - Fish-bearing
 - Temporary Access Structures
- Wildlife
 - Access Control/Lines of Sight
- Vegetation
 - Access Control
- Housekeeping
 - Waste Management
 - Temporary Structures
- Training and Documentation
 - Documentation Available/Up to Date
- Socio-economic
 - Traditional Land and Resource Use
 - Heritage Resources

Facility

- TRANS MOUNTAIN EXPANSION PROJECT

Observations

General observations on the ROW occurred over a two day period. The Inspection Team attended the 6:30 AM company/contractor inspectors meeting both field days. Based on activities scheduled in the daily work plan, the team decided to start from the most easterly point where work was ongoing and move westward, selecting a variety of activities to observe. The ROW had been cleared in several areas and the inspection convoy was able to drive on the right of way, however, some locations were inaccessible at this time and required access by foot. The following observations were made:

Biosecurity Measures

Car wash – Biosecurity Cleaning for CER Vehicle

- CER personnel were responsible for cleaning their vehicle at the local car wash in Edson, AB. TMPU representatives followed their biosecurity protocol and applied a 1-2% bleach solution to the CER vehicle tires and let it stand for 15 minutes before moving the vehicle.

KP 215+500 – Area of Potential Soil Borne Pathogens

- Active stripping and grading operations occurring in the area.
- Site foreman advised inspection team of cleaning requirements for site entry.
- Entry declined by inspection team; observations occurred from a safe distance.
- Surveying / staking of spoils and soil piles performed by ground crews.
- No issues observed.

KP 215+720

- Biosecurity records check conducted on two pieces of heavy equipment: 2 bull dozers (DR 8007 and DR 8008).
- Documentation confirmed biosecurity program was followed according to requirements.
- Topsoil mulching operations observed ahead of stripping and grading crews.
- No issues observed.

Clearing, Stripping and Grading

KP 146+712

- The inspection team observed active clearing operations with heavy equipment utilized.
- Stripping and grading occurring to provide site access.
- TMPU stated the site will be ramped/matted to the adjacent road crossing nearby.

KP 215+720

- Active topsoil stripping, grading and stock piling observed.
- Spoils being segregated and staked.
- Signs were present and visible, indicating no fueling near wetlands and feature ID.
- Clearing activities were observed for approximately ~700 meters (westward), and proceeding through multiple wetland features with segments of ROW narrowed.
- Merchantable timber was stacked, whereas slash piles for burning had been piled up.

KP 249+000

- Multiple activities noted through this section of ROW including clearing, mulching, stripping and grading.
- Merchantable timber had been stacked, and slash timber piled up for burning.
- Activities were occurring in close proximity to each other.
- Topsoil and spoils were segregated according to color variation and staked for ID.

KP 249+200

- Two separate crews observed working on the ROW; one crew is timber harvest/clearing, second crew was stripping and grading.
- Distance of approximately 500 m between operating crews.
- Timber crews observed applying level 1 biosecurity cleaning to their vehicles to enter work area. Level 1 cleaning consists of manually brushing of large clumps of dirt off the vehicle tires and wheel wells.
- The Inspection Team's vehicles were also subject to level 1 biosecurity cleaning.

KP 285+000

- Clearing operations were active at this location of the ROW.
- Slash and merchantable timber had been piled in multiple places.
- Corridor crosses wetlands and watercourses.
- All features were observed having the required and visible signs, including no fueling and feature ID.

Access Roads

KP 155+980 – Shoefly 67A

- Active work crews were observed placing wood matting down to gain access to a wetland feature. Geotextile fabric was used as underlay with mats placed on top.
- Signs were present and visible, including wetland ID and no fueling.
- Small watercourse (AB-93) is present. The area was ramped with rig mats for temporary access to mitigate disturbance footprint, as stated by TMPU personnel.
- Sediment control fencing (e.g., geotextile fabric) present over the watercourse crossing.
- The location has been identified as a deficiency for housekeeping, as stated by Company personnel. The area will be monitored and cleaned up once access is complete.

KP 285+280 (Associated with rare plant site)

- Mulching completed in surrounding area.
- Plant plot delineated and flagged for notification to operators; work crews avoiding plot site during CER inspection.
- Signs present and visible, including feature ID and rare plant notifications.
- No issues observed.

Watercourses and Wetlands

KP 172+720 – Little Brule Creek

- Access clearing completed.
- TMPU states that seasonal work is complete and no further activities are planned for this construction season.
- Riparian area has been left intact on either side of watercourse.
- Merchantable timber was observed as piled in temporary work space (TWS) and removal is planned.
- ROW narrowed through the riparian area where trenching will occur.
- No active work observed.

KP 226+460 – Bench Creek (AB-132)

- Private property adjacent to the ROW (~200m uphill from channel); site has been characterized as an area of moderate contamination because the landowner has a vehicle salvage yard on the property.
- TMPU representatives state that stripping operations have taken reasonable precautions when working in area to avoid the landowner's property.
- Signs present and visible, identifying contaminated area.
- Property has been fenced off and flagged.
- Steep slope leading down to the watercourse crossing.
- Diversion trenches were excavated on either side of the steep ROW as erosion/sediment control measure, allowing for catchment of surface water.
- A clear-span bridge has been constructed for access; geotextile fabric used as sediment control measure over crossing.
- No issues observed with sediment.
- Spill kits present on either side of the watercourse.
- Watercourse construction activities are subject to biosecurity measures for whirling disease.
- Signs present and visible indicating level 1, full wash and bleach solution cleaning required before site access is permitted.
- No trenching activities occurring during the inspection.
- TMPU representatives stated the plan is to contain the area using sheet piling ~ 2.5 meters from the center line and on both sides of the trench to limit disturbances instream.

KP 246+710 – Sundance Creek

- A clear-span bridge has been built for access. Geotextile fabric utilized as sediment control barrier and adequately containing sediments and debris.
- Required signs present and visible; including no fueling and watercourse ID.
- Biosecurity concern present; possible whirling disease.
- Level 1 cleaning required.
- No issues observed.

Other Areas of Interest

KP 269+800 – Traditional Land Use (TLU) Site

- This site was mitigated in cooperation with local indigenous partners.
- Mitigation measures were explained to participating Indigenous Monitors (IM).

- IM's indicated no concerns.
- No issues noted or observed.

KP 223+300 – Road Bore

- Site had been cleared and prepared for ditching activities, and bell holes excavated on either side of the road.
- Side boom was present to assist in the activity; no environmental concerns observed.
- Required safety signage is present and visible indicating "Open Ditch" and fall hazards.
- Exclusion fencing surrounds open ditch.
- Level 1 cleaning station present at road access.
- The pipe had just been pulled through the bore path before CER visited the site.

Tool Used

No Tool Used

General Observations: Construction & Lay-down Yards

Date

2020-02-18

Discipline

Environmental Protection

Categories

- Soils and Soil Productivity
 - Chemical Spills/Releases
- Housekeeping
 - Waste Management
- Training and Documentation
 - Documentation Available/Up to Date
 - Inspections

Facility

- TRANS MOUNTAIN EXPANSION PROJECT

Observations

The Inspection team inspected both Trans Mountain and Midwest construction yards on two separate days during the inspection week. On Tuesday, February 18, at the lay-down yard where the Trans Mountain and Midwest management trailers are located was inspected. On Friday, February 21, the Midwest construction yard was inspected. The following general observations were made:

Trans Mountain/Midwest Lay down Yard

- The CER inspection team performed a walk around inspection of the materials stored on site.
- The main area of environmental interest was the refueling site; no issues were found.
- A bucket labelled "windshield wash" was observed on the ground; the Inspector requested to view the MSDS sheets for the liquid – Contents were a household glass cleaner.
- No issues were observed regarding storage of non-hazardous materials.
- The Yard Inspection logs were requested. Trans Mountain personnel supplied the logs. Procedures were being followed and documentation was up to date.

Midwest Construction Yard

During the yard inspection, several areas were observed, including waste management, fuel and materials storage, and the biosecurity wash bay.

- The waste bins are labelled according to content.
- Re-fueling stations observed in good condition. No residual staining and the applicable signage, fire extinguishers and spill kits were present.
- Larger construction materials were sorted and proper house-keeping observed.
- The biosecurity cleaning station was active with large equipment observed receiving a level three sanitation by power washing.
- Site supervisor reviewed FLHA and the inspection team signed off.
- Secondary containment present where required for hydrocarbon sources near the wash bay.
- CER Inspection Team observed no unsafe work practices.
- The IO observed housekeeping being conducted by contractor personnel.

Tool Used

No Tool Used

IAMC, Indigenous Monitor Observation 1

Date

2020-02-19

Discipline

Environmental Protection

Categories

- Soils and Soil Productivity
 - Erosion Control
 - Soil Handling
 - Biosecurity
- Surface Water Management
 - Containment and Drainage Structures
- Water Bodies - Non-Fish-bearing
 - Temporary Access Structures
- Water Bodies - Fish-bearing
 - Temporary Access Structures
- Wildlife
 - Access Control/Lines of Sight
 - Destruction/Loss of Habitat
- Vegetation
 - Species of Concern
- Housekeeping
 - Waste Management
 - Temporary Structures
- Socio-economic
 - Effects on Communities (including indigenous)
 - Traditional Land and Resource Use
 - Heritage Resources

Facility

- TRANS MOUNTAIN EXPANSION PROJECT

Observations

Additional Observation recorded by IAMC Indigenous Monitors participating in the CER Inspection. Any compliance related observations that require specific regulatory follow-up have been recorded above.

Spread 2 of the Trans Mountain Expansion Project (TEMP)

Opening Meeting at Laydown Yard, West of Edson

- Introductions between Trans Mountain Environmental personal and CER Inspectors/ IAMC-TMX Indigenous Monitors
- Completed the TMEP visitor Orientation
- Did an Inspection of one of the yards in the area on the first day and requested to inspect the other yards at a different day.
- Attended morning Inspector meetings on February 19 and February 20, 2020.
- February 21, 2020. Had our close out meeting

Right of Way Inspection

- Made our way to different areas of interest along spread #2. Observed areas where access was being done on each side of the gravel roads. Observed access and clearing being done at wetlands and watercourses. Clearing crews, and burning crews were working on the RoW.
- At Road 92 wetland crossing there was Geo textile on the access crossing that was falling down in some areas and down on the end at the crossing. Just a few minor issues to take care of at that crossing, which the TMEP Environmental Inspectors are aware of.
- Bridge Installations have been done on a few watercourse crossings, my observation is that they did a great job, erosion control measures were in place.
- Along the RoW there was signage indicating the area of Bio-Security, Cleaning stations were in place and sign off sheets were available at each station. Higher levels of Bio-Security Equipment would have to be cleaned at the yard before it can be moved elsewhere along the RoW.
- There were sensitive areas on our inspection that had proper signage, and flagging was visible to let personal about the area.
- Access matting was constructed to RoW, at one site we observed a leak coming from a logging contractors' truck that had a tide tank, the leak was dripping on the matting. My observation is that where the leak was coming from. Either the tide tank or nozzle. Nozzle was not in the holster; it was just laying in the floor of the box.
- Traditional Land Use Site along the RoW, had proper signage. Mitigation measures for each site were in place from speaking with the TMEP EI. I was very pleased to hear that they take these sites very serious.

Tool Used

No

Tool Used

IAMC, Indigenous Monitor Observation 2

Date

2020-02-19

Discipline

Environmental Protection

Categories

- Soils and Soil Productivity
 - Erosion Control
 - Soil Handling
 - Biosecurity
- Surface Water Management
 - Containment and Drainage Structures
- Water Bodies - Non-Fish-bearing
 - Temporary Access Structures
- Water Bodies - Fish-bearing
 - Temporary Access Structures
- Wildlife
 - Access Control/Lines of Sight
- Vegetation
 - Access Control
- Housekeeping
 - Waste Management
 - Temporary Structures
- Socio-economic
 - Effects on Communities (including indigenous)
 - Traditional Land and Resource Use
 - Heritage Resources

Facility

- TRANS MOUNTAIN EXPANSION PROJECT

Observations

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SPREAD 2 - TMX

Feb 18-21. 2020

Opening remarks introduced CER to iamc IM's , cci ltd and trans mountain staff

Went over spread 2 orientation for the ones that were first time on spread still attended to take part in the orientation. Following up on an environmental inspection on the Midwest yard (Edson) observed the yard and looked at secondary containments and gas fuelling station. Waste management's containers were all button-up and were properly stored materials. Labeling and drip trays were where they needed to be in place so that was cool to see. Biosecurity cleaning will be done before heading to the row (right of way) also attended the 6:30 AM company. inspectors meeting took place at Mid-west yard (Edson) got a rundown on activities that are actively working mostly continued accesses and bore push welds and stringing activity's right down to clearing and stripping/grading.

Right of way inspection:

- Midwest wash bay yard (Edson) observed secondary containments for fueling up stations were label and signage in visual approach and stored chemicals stored in proper containers, labeling and drip trays were used and put out in the right places. garbage contaminants were all button-up, just a little few items stored not in the proper container but was taken care of properly, also took a look at the wash bay station that's beside the other midwest yard. workers were busy cleaning machines and were properly wearing the right PPE for the wash bay
- Observed the biosecurity level one station workers brushing off the dirt (soil) off of tires and wheel well and bumpers, boots finally signing off on the paper that they did the proper thing in a good manner and also we went through it and brushed off our boots and crews vehicles signed off before we go observe clearing, I thought that was pretty cool and a good practice measure that the workers take it seriously.
- went to observe the mulching machine from a safe distance breaks up the topsoil real nice and fine leaves with no big clumps of dirt. Stripping and grading were ongoing, Active stockpiling was also observed by crew. Soils being staked. signage was in proper places
- the crew went to observe the burning pit signed off on the FLHA. was also pleased that trans mountain on sending loads of wood to communities. It also was cool to see them backfill the completion of the fire pit, that was cleared and soil was properly backfilled that was cool.
- observed the bore push under the roadway was awesome and pleased to know that the optic fabric wire runs along the pipeline can detect leaks or anything in that matter along the stretch of the project. fencing was in place around open ditch areas
- observed placing of wooden mats down to gain access to wetland features. fabric was used underneath the mats proper signage was visible, that was cool to see.
- was interesting observing the heavy machinery towing large tires to compact the ground right equipment was used for activities
- Observed TLU Site it has been mitigated with local indigenous communities. mitigation measures were explained to IMs. very good job they are doing throughout the spread

Tool Used

No

Tool Used

Compliance Summary**Corrected Non-Compliance 1: Sediment Control Structures****Date**

2020-02-19

Discipline

Environmental Protection

Categories

- Water Bodies - Non-Fish-bearing
 - Sedimentation/Turbidity

Facility

- TRANS MOUNTAIN EXPANSION PROJECT

Observations

While inspecting the pipeline Right-of-Way, near kilometer posting (KP) 198+800 and WT-446 (wetland feature), the inspection team observed access clearing activities through multiple wetland features, most of which are seasonal. Heavy equipment was present in the area, however work crews were observed as inactive. The following observations were made:

KP 198+800

- The inspection team observed access paths that had been cleared through a hotline crossing, and adjacent to an unnamed watercourse.
- ROW has been narrowed through the crossing area.
- Sediment control structures (e.g., geotextile fabric) have been erected to contain sediment and debris. The tail sections and wing walls were observed in poor condition, sagging and loose with organic debris piling up against the fence.

WT-446

- While driving the ROW, the inspection team observed poor maintenance of erosion and sediment control (ESC) fencing (geotextile).
- The geotextile was observed by the IO as torn, nearing load capacity and in disarray from the adverse weather conditions, likely attributed to previous heavy snow fall which was observed in the area.

Tool Used

Corrected
Non-compliance (CNC)

Legislative Requirement

Pipeline
Environmental Protection Plan For The Trans Mountain ULC Trans Mountain Expansion Project. Condition 72. September 2019.

Applicable Wording from Legislative Document

EPP.
Pg. 41/514 (PDF). Section 7. General Pipeline Construction Mitigation Measures. Drainage, Erosion and Sediment Control. 117. Temporary drainage, erosion and sediment control measures will be implemented and will remain in place and be maintained over the course of construction activities. During construction, the control measures will be inspected to ensure functionality and repairs will be completed as required (i.e., rain event, after pipe installation).

Company Action Required

TMPU will provide evidence demonstrating they have achieved compliance with the legislative requirements, and have corrected the issues with sediment control near KP 189+800, and in the vicinity of wetland 446.

To assist in achieving compliance, photographic evidence will be provided to the CER to confirm corrective actions.

Due Date

2020-02-21

Corrected Non-Compliance 2: Management of Waste Receptacles

Date

2020-02-21

Discipline

Environmental Protection

Categories

- Housekeeping
 - Waste Management

Facility

- TRANS MOUNTAIN EXPANSION PROJECT

Observations

While inspecting the Midwest construction yard, the Inspection Team observed several of the waste receptacles containing improperly segregated materials. The following observations were made:

- In the bin labelled, "Metals", multiple plastic water bottles and a loose tie-down straps were observed intertwined in scrap metal.
- In the "Contaminated Soils" bin, several garbage bags were observed inside. One of the bags did not feel as though it was containing soils. Upon opening of the bag, the inspector found absorbent pads used for collecting hazardous liquids, and snow.
- In the "garbage" bin, multiple small containers that had originally contained hazardous chemicals (e.g., antifreeze) were observed inside.

Tool Used

Corrected

Non-compliance (CNC)

Legislative Requirement

Pipeline

Environmental Protection Plan For The Trans Mountain ULC Trans Mountain Expansion Project. Condition 72. September 2019.

Applicable Wording from Legislative Document

EPP.

Pg. 42/514 (PDF). Section 7. General Pipeline Construction Mitigation Measures. Waste Disposal. 119. Collect construction debris (e.g., welding rods, oil cans, ropes, bands, timbers and caps) and other waste materials on a regular basis and dispose of at a Trans Mountain-approved waste disposal facility and in accordance with the Waste Management (Appendix G) and the Spill Contingency Plan (see Appendix B). Ensure wastes are recycled where practical.

Company Action Required

TMPU must demonstrate how their management of waste materials is in compliance with the legislative requirements in the EPP and Appendix G – Waste Management Plan, with respect to waste segregation.

Correcting the issues of improperly segregated waste materials will be completed with the

measures provided under section 3.1.2 – Waste Disposal, which states:

1. *All waste materials will be disposed of in accordance with Federal and Provincial legislation and Trans Mountain policy, as required.*
2. *All waste must be characterized and classified so that it may be properly recycled or disposed of. It is the Contractor's responsibility for characterizing and classifying any waste generated for their spread/work site prior to storage, transport and disposal.*

TMPU will provide the CER with evidence, photographs and documentation, to confirm the waste has been segregated into the appropriate waste streams.

Due Date

2020-02-21

Notice of Non-Compliance: Release of Hydrocarbons on the ROW

Date

2020-02-20

Discipline

Environmental Protection

Categories

- Soils and Soil Productivity
 - Chemical Spills/Releases

Facility

- TRANS MOUNTAIN EXPANSION PROJECT

Observations

At a location near Hinton, AB, the Inspection Team accessed a site of higher elevation where access to the ROW was matted to mitigate compaction and rutting. When at an area of active clearing operations, on a slope and near a watercourse, the following observations were made:

- Two contractor pickup trucks were observed parked on an upward angle with the front facing toward the exit for ease of evacuation. Both trucks were equipped with tidy tanks for refueling of larger equipment.
- Upon initial inspection, one of the trucks was leaking hydrocarbons onto the access matting, with a steady drip observed falling from the rear, left bumper side. When the Inspector looked closer, the bed of the truck was observed in poor condition, with hydrocarbons staining the entire wooden bed liner, two pails (one empty) of unknown contents, and the tidy tank nozzle

loose and not secured within appropriate secondary containment. The tidy tank was observed to have peeling paint and excessive rust on the outer wall.

- The second truck was observed having some residual staining on the plastic, grooved bed liner. A noticeable hydrocarbon sheen was present, as well as a lingering odor of diesel fuel. The vehicle did not appear to be leaking any hydrocarbons onto the access matting.
- Trans Mountain representatives immediately placed a plastic catchment tray (normally used for secondary containment) under the leaking truck.
- The vehicle did not display any visible spill kit, or fire extinguisher readily available near the tidy tank. TMPU personnel were able to open the vehicle and the IO observed and confirmed the non-visible equipment was inside the trucks.

Tool Used

Notice of Non-compliance (NNC)

Legislative Requirement

Pipeline

Environmental Protection Plan For The Trans Mountain ULC Trans Mountain Expansion Project. Condition 72. September 2019.

Applicable Wording from Legislative Document

EPP.

Pg. 43/514 (PDF). Section 7. General Pipeline Construction Mitigation Measures.

Spill Prevention. 139. All fuel nozzles are to be stored in a secure manner to prevent drips and spills. Fuel nozzle secured within a receptacle to collect incidental drips after fueling. Do not wash equipment or machinery in or near watercourses, wetlands or lakes. Control wastewater from construction activities to avoid discharge directly or indirectly into any body of water. Pg. 34/514 (PDF). Section 7. General Pipeline Construction Mitigation Measures.

Contaminated Soils. 43. Implement the Contamination Discovery Contingency Plan (see Appendix B) in the event that contaminated soils are discovered during construction. Adhere to applicable measures provided in the Waste Management section in Appendix G for handling and disposal of contaminated material.

Company Action Required

TMPU will confirm the following measures have been undertaken to bring the issues of unsecured fuel nozzles, including containment requirements, back into compliance:

- TMPU will confirm the nozzle for the tidy tank has been secured within a acceptable containment receptacle for transportation around the project footprint.
- TMPU will supply written confirmation that the contractors were informed of the requirements involved with transporting hydrocarbons, or that measures are in place, or have been put in place, to ensure that contractors follow this requirement.
- Evidence will be supplied to the CER, confirming that the nozzle has been secured and that company/contractors have been informed.

Due Date

2020-04-14

Company Action Required

TMPU will provide the following to the CER to confirm the hydrocarbon spill has been mitigated, which includes:

- Written confirmation that the area where the spill occurred has been assessed and cleaned up in accordance with the Contamination Discovery Plan in the EPP – Appendix B.
- TMPU will supply written evidence, confirming the source of the spill has been assessed, and the contaminated construction materials have been removed.
- TMPU will confirm contractors are aware of the responsibilities for disposal of contaminated materials.
- Photographic evidence will also be provided showing work has been completed.

Due Date

2020-04-14