



Waste Management Plan

Transmission Line 146L Gander to Gambo Rebuild Project

Submitted by:

NL Power Inc.

March 2024

Introduction

Newfoundland Power (NLP) is preparing to rebuild their 146L Transmission Line between Gambo and Gander, Newfoundland. The decommissioning project was released from Environmental Assessment on July 7, 2023 and, as a condition of release, a Waste Management Plan (WMP) is to be approved prior to commencement of the project.

The wood pole transmission line spans 40.7 km between substations in Gander and Gambo, and was constructed in 1964. This line will be decommissioned during 2025, following the construction and commissioning of the new transmission line.

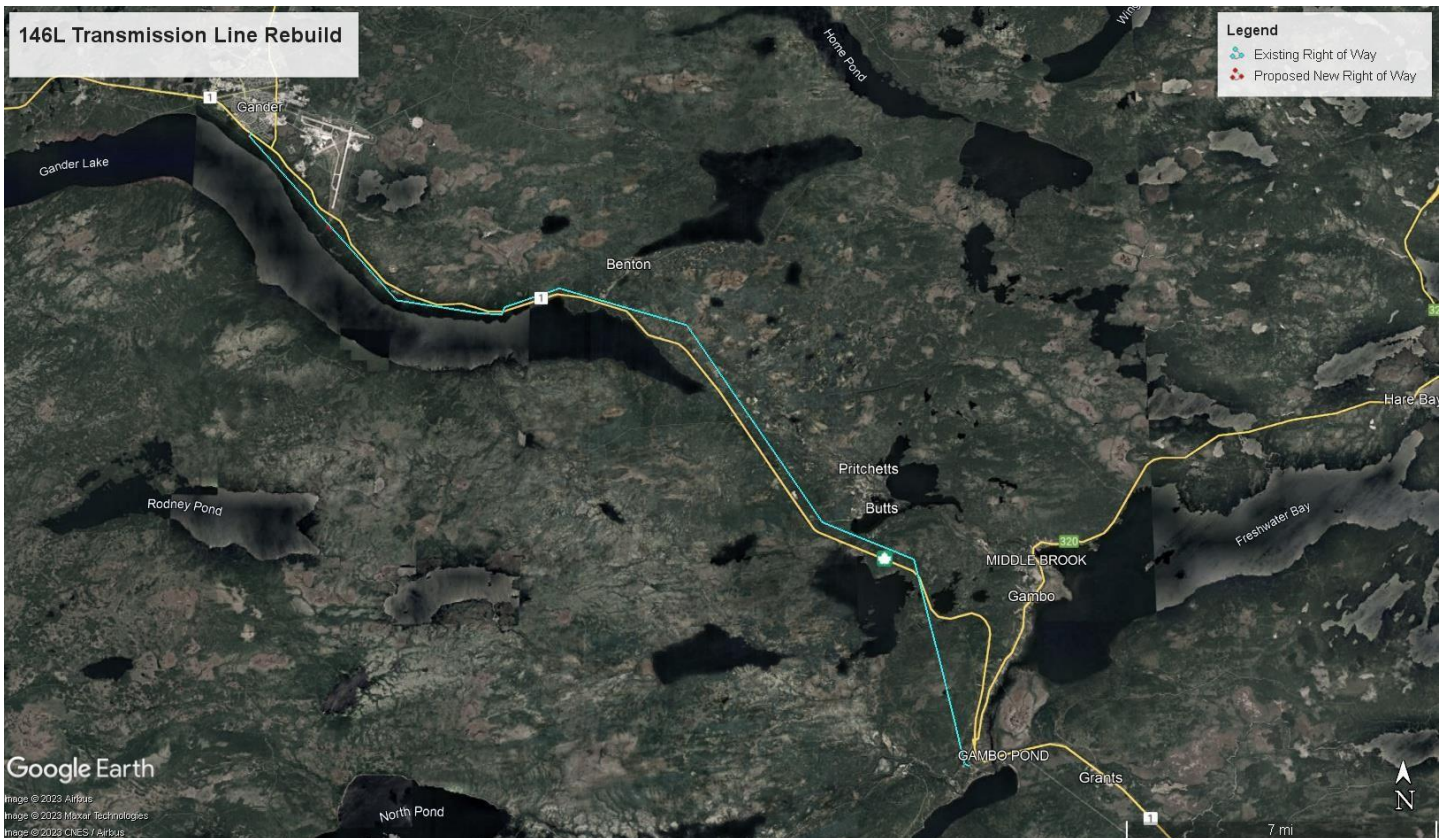


Figure 1. Project Location

Purpose

NLP is ISO 14001 registered and is committed to maintaining a high standard of environmental responsibility and performance. This WMP is consistent with NLP's Environmental Policy and Guiding Principles.

The purpose of this WMP is to identify the waste streams for this project and establish requirements for management of those wastes. In general, opportunities for reuse and

recycling of materials will be implemented where possible; otherwise, waste will be disposed of at approved waste disposal sites.

Project Personnel and Responsibilities

Decommissioning work will be performed by a contractor, with NLP providing a full-time construction monitor and environmental monitoring. The contractor is responsible for waste management functions and will be informed of waste management requirements and expectations. NLP will monitor and direct the work as required to ensure compliance.

Contingency Plans

The contractor has an Emergency Response Plan for Spills and will have spill kits on site at all times. Contractor and NLP personnel are trained in spill response. There will be no bulk storage of fuel on site. In the event of a significant incident, NLP will initiate and support its own emergency response protocols including use of an environmental consultant for site remediation.

Table1. Waste Generation, Storage, Transport and Disposal.

Waste Source	Waste Type/Quantity	Storage and Transport	Disposal
Decommissioning activity – wood pole structures	Untreated, CCA, PCP and potential creosote treated wood waste. Includes poles, cross bracing and cross arms. All existing pole material will be removed and disposed of properly. Approximately 160 wooden H-Frame transmission structures.	Transported by truck/trailer to approved landfill by contractor.	Disposal of TWW would have to meet the requirements of GD-PPD – 075.1 the Provincial Treated Wood Waste Disposal Guidance Document. The contractor may retain suitable CCA or untreated wood material for possible reuse or donation.
Decommissioning activity – insulators and miscellaneous metal hardware	Porcelain and glass insulators. Approximately 2,900 insulators or 11,000 kg. Approximately 2,000 kg of miscellaneous hardware	Temporary storage at existing laydowns. No new laydowns planned to be constructed. Transport by truck to recycler.	Newco Metals will receive the material in Gander for processing.
Decommissioning activity - conductor	Aluminum Steel Core conductor. Approximately 123 km or 100,000 kg.	Temporary storage at existing laydowns. No new laydowns planned to be constructed. Transport by truck to recycler.	Newco Metals will receive the material in Gander for processing.
Grubbing and Pole Construction – Soil stockpile	Quantities of clean soil and vegetative matter generated on site or transported from an approved quarry site.	Stockpiled within the RoW (with appropriate covering and slope) for use when needed.	Unused soil will be buried along the RoW following construction to support natural revegetation.

Vegetation Clearing – Cut Wood Waste	Cut vegetation (where present) within the 0.6105 km ² of RoW, along with some trimming as necessary on existing RoW and access trails.	Chipped or logged and transported off site regularly with no longterm storage on site. Some nonmerchantable timber may be saved for use in corduroy over wetland areas. Merchantable timber cut within the boundary of the CBPPL License area will be donated to the company for use.	Cut wood waste will be transported to a Contractor owned site for dumping or donated.
Field activities - Domestic Waste	Unsorted domestic wastes associated with lunch materials and other consumable items. Includes plastics, glass, organic waste, beverage containers, etc. One to two bags per day.	Work sites to be kept neat and tidy at all times. Suitable containers to be used as appropriate. Waste to be removed from work sites regularly (at least weekly) for proper disposal.	Transport off-site for disposal at approved facility.
Field Activities – Industrial Waste	May include wastes in limited quantities associated with equipment maintenance and general construction activities. May include rags, grease canisters, oil containers, parts, sorbents, etc.	Temporarily stored in suitable containers and removed from work sites regularly (at least weekly) for proper disposal.	Transport off-site for disposal at approved facility.
Domestic and Industrial Carboard and Paper Wastes	May include wastes associated with the shipping and transport of materials, paperwork,	Temporarily stored in suitable containers or bundled and secured and removed from work sites regularly (at least weekly) for recycling.	Transport off-site for disposal at approved facility.

Background

Some wood poles, cross braces, and cross arm materials have been treated with pentachlorophenol (PCP) which is regulated under the Pest Control Products Act. Newfoundland Power is the beneficiary of a PMRA approved label for the use, storage, and disposal of Pentachlorophenol Treated Poles & Cross Arms. A small number of the original structure components have been replaced over the years, due to damage or deterioration, but the majority of structures have been in place for 60 years since commissioning of the original line.

The decommissioning work will be carried out following construction and commissioning in 2025. The entire line to be removed is comprised of 160 structures.

Sampling

Treated wood will be sampled during decommissioning process. Decommissioned wood products to be removed from site for which test results exceed the Landfill Disposal Standards for Treated Wood Waste will be transported to and disposed of at the Sunnyside Waste Recovery Facility.

Table 2. Landfill Disposal Standards for TWW (DOECC Pollution Prevention Division, 2015)

Type of Treated Wood	WDG/Hazardous Waste Number and Contaminant	Column 1: CCME-CSQG- mg/kg	Column 2:TCLP : (mg/l) (CEPA)	Column 3 (doubleTCLP limits)
Inorganic Preservatives:	L4 - Arsenic	26.0	2.5	5.0
	L10-Chromium (total)	87.0	5.0	10.0
Creosote Formulation	L-46 -m-cresol, L-47- o-cresol, L-48 - p-cresol and total cresol*	<u>TCLP required for total cresols</u>	200.0*	400
	L37 Benzo(a)pyrene	72.0	0.001	0.002
Chlorophenolic Formulation	L84-Pentachlorophenol	28.0	6.00	12.0

*If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200.0 mg/l.

References

DOECC Pollution Prevention Division. (2015, September 8). *Guidance Document on Treated Wood Waste Disposal*. Retrieved from Department of Environment and Climate Change:

<https://www.gov.nl.ca/ecc/files/env-protection-waste-guidancedocs-gd-ppd-075.1treatedwood-waste-disposal-.pdf>