

## **Directive 058**

Release date: February 7, 2025 Effective date: February 7, 2025 Replaces previous edition issued October 7, 2022

# Oilfield Waste Management Requirements for the Upstream Petroleum Industry

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#### 1 Introduction

#### 1.1 Purpose of This Directive

The purpose of this directive is to identify the requirements for the handling, **treatment**, reuse, and disposal of **oilfield waste** produced by the upstream petroleum and geothermal resource development industries. This includes waste management responsibilities, activities, methods, and documentation.

Definitions applicable to *Directive 058* are included in appendix 1, and defined terms are set in **boldface** at first use, as seen above.

#### 1.2 Waste Management Jurisdictional Overview

Both the Alberta Energy Regulator (AER) and Alberta Environment and Parks (AEP) have jurisdiction over waste.

Generally, the AER is responsible for oilfield waste, and AEP is responsible for most other waste generated in Alberta. Each agency's requirements provide an equivalent level of environmental protection and public safety; however, their regulatory processes may differ.

The AER and AEP have divided regulatory responsibilities based on the type of waste management **facility** or activity.

#### 1.3 AER Requirements

Following AER requirements is mandatory for the responsible duty holder as specified in legislation (e.g., licensee, operator, company, applicant, approval holder, or permit holder). The term "must" indicates a requirement, while terms such as "should," "recommends," and "expects" indicate a recommended practice.

The <u>Oil and Gas Conservation Rules</u> (OGCR), section 8.150(2), and the <u>Geothermal Resource</u> <u>Development Rules</u> (GRDR), section 62(2), set out the responsibilities of the **oilfield waste generator**, while OGCR, section 8.150(3), sets out the responsibilities for the **oilfield waste receiver**. In this directive, the duty holder has been identified when a requirement is specific to the oilfield waste generator or oilfield waste receiver.

Each AER requirement that is unique to this directive is numbered.

Information on compliance and enforcement can be found on the AER website.

1) All documentation required under this directive must be provided to the AER upon request to confirm compliance.

#### 1.4 Reporting a Release of an Oilfield Waste

- 2) The duty holder must immediately report any release of oilfield waste to the AER through the Energy and Environmental Emergency 24-Hour Response Line if the release
  - a) is greater than two cubic metres  $(m^3)$  on lease,
  - b) is off lease, or
  - c) regardless of size or location, is causing or has caused an adverse effect.

Refer to the AER website for more on release reporting requirements.

#### 1.5 What's New in This Edition

This edition has been updated with the ongoing consolidation and integration of requirements as part of the ongoing implementation of the *Liability Management Framework* (*LMF*).

#### March 2022 Changes

The directive has been extensively restructured and rewritten and now incorporates

- Directive 058—Addendum 2015-04-14, which has been rescinded;
- relevant sections of <u>Report 2009-A: Updates to Storage Requirements for the Upstream</u> <u>Petroleum Industry; Discussion Document on Directive 055</u> and <u>Interim Directive (ID) 2000-</u> <u>03: Harmonization of Waste Management and Memorandum of Understanding Between the</u> <u>Alberta Energy and Utilities Board and Alberta Environment</u>; and
- the following documents, which have also been rescinded:
  - ID 99-04: Deposition of Oilfield Waste into Landfills,
  - ID 2000-04: An Update to the Requirements for the Appropriate Management of Oilfield Wastes,
  - Informational Letter (IL) 98-01: A Memorandum of Understanding Between Alberta Environmental Protection and the Alberta Energy and Utilities Board Regarding Coordination of Release Notification Requirements and Subsequent Regulatory Response, and
  - IL 98-02: Suspension, Abandonment, Decontamination, and Surface Land Reclamation of Upstream Oil and Gas Facilities.

Below are additional changes made to this edition:

• Waste storage has been expanded to include storage of **water for reuse** in hydraulic fracturing operations.

Rarely used waste management methods "disposal by pipeline" and "spreading oily by-product on roads" have been removed. Duty holders may still use these methods but must apply for an alternative waste management activity as per section 5.

• Obsolete requirements have been removed and duplicated requirements removed or clarified.

#### 2 Waste Characterization and Classification

Waste characterization is the assessment of the physical, chemical, and toxicological characteristics (i.e., properties) of a waste and is needed in order to classify the waste. The classification determines the dangers relating to transporting the waste on public roads and the appropriate management option.

The AER and AEP use different terminology to classify waste, but the terms have the same meaning.

AER term	AEP term
Non-dangerous oilfield waste (non-DOW)	Non-hazardous waste
Dangerous oilfield waste (DOW)	Hazardous waste

The duty holder should therefore be mindful of this terminology when referring to AEP documents such as the *Waste Control Regulation* (*WCR*) or the *Alberta User Guide for Waste Managers*.

- 3) The oilfield waste generator must classify the waste and the oilfield waste receiver must verify the waste's classification as per
  - a) the WCR, Schedule 1, sections 1 and 2; and
  - b) appendix 2 of this directive, which provides common waste classifications for waste with historical data (pre-1996).
- A container or collection of containers with an aggregate internal volume greater than 5 litres
   (L) must be classified as a DOW if it contains a DOW and it is not "empty," as defined in the *WCR*.

The oilfield waste generator may manage wastes other than those substances listed in table 4b of the *Alberta User Guide for Waste Managers*, referred to in the *WCR*, as non-DOW if

- the amount of waste produced at a single site is less than 5 kilograms (kg) per month if solid or less than 5 L per month if liquid, and
- the total quantity accumulated over a 30-day period does not exceed 5 kg or 5 L.
- 5) The duty holder must characterize and classify the waste before adding any amendment (e.g., waste must meet landfill acceptance criteria prior to any amendment) and before adding any sorbent materials to facilitate transportation.
- 6) The duty holder must not dilute oilfield waste by adding any solid or liquid to avoid regulatory requirements.

#### 3 Documentation for Transport

Tracking and classification requirements for the movement of hazardous wastes and hazardous recyclables between Alberta and other provinces and territories are set out in the <u>Cross-Border</u> <u>Movement of Hazardous Waste and Hazardous Recyclable Material Regulation</u> under the <u>Canadian Environmental Protection Act</u>.

Where applicable, DOW shipments follow the <u>Transportation of Dangerous Goods (TDG) Act</u> and <u>Regulations</u>, which promote public safety when dangerous goods are being handled or transported by road, rail, air, or water. The safe transportation of hazardous wastes and hazardous recyclables in Alberta is regulated under the <u>Environmental Protection and Enhancement Act</u> (EPEA) and the *WCR*.

- 7) The oilfield waste generator must use shipping documents (e.g., recycle docket, movement documentation, waste form [electronic or hard copy], manifest, truck ticket) to ensure that oilfield wastes are safely transported and received at the intended point of treatment or disposal facility.
- 8) The oilfield waste receiver must fill out their portion of the shipping document.
- 9) The oilfield waste generator must provide detailed information on the shipping documents for first responders to use in the event of an accident, including the waste code and the waste source (i.e., where the waste was generated).

#### 3.1 When to Use the Alberta Oilfield Waste Form

- 10) The oilfield waste generator and the waste receiver must complete their respective parts of the AER's Alberta Oilfield Waste Form when DOWs are being transported entirely within Alberta. If more space is needed, additional pages may be attached to the form. Waste volumes may be recorded in tonnes, kilograms, cubic metres, or litres.
- 11) The AER's waste form must be filled out for each load of DOW being transported unless the same oilfield waste is being transported by one or more trucks. If the same waste is being transported, one form may be used; however, the following information must be attached for each load:
  - form number
  - truck unit number
  - waste code
  - UN number
  - TDG shipping name

- waste classification
- packing group
- quantity shipped
- composition (oil, water, solids) (oilfield waste receiver only)
- handling code

The AER's waste form cannot be used on its own when transporting DOWs across provincial, territorial, or international borders, which falls under federal jurisdiction. The federal requirements for shipping documents must be followed.

- 12) When a shipment contains mixed waste, the oilfield waste generator must document the shipment based on the most dangerous waste and identify for each waste type, its code, source, and volume. If the individual volumes are not known, the total combined volume must be documented.
- 13) If the oilfield waste generator uses the AER's waste form as a tracking document for non-DOWs, they must clearly identify on the form that the waste is non-dangerous and include the waste code.

#### 3.1.1 Exemption From Using the AER's Waste Form

The oilfield waste generator does not need to complete the AER's waste form in the following situations:

- The quantity of DOW being transported does not exceed 5 kg or 5 L.
- The DOW is treated or disposed of on site.
- The DOW is transported from the site of origin to another site, provided that
  - the duty holder of both sites is the same,
  - the transport vehicle displays a placard with the appropriate UN number (as per the *TDG Regulations*), and
  - the DOW is accompanied by a shipping document that includes the hazard class, emergency response contact, total mass or volume of the DOW, and the number of packages if applicable.
- The DOW is being transported to an AEP-authorized recycling facility and has an AEP recycle docket.

#### 3.2 Reconciling Discrepancies in the Waste Form

14) The oilfield waste generator must reconcile any differences between the waste details entered in the waste form by the receiver and those entered by the generator.

Discrepancies could include differences in recorded waste quantities that may be due to inaccurate measurement in the field.

15) If the discrepancy has not been reconciled within 60 days from the date of the shipment, the oilfield waste generator must notify the AER at <u>Directive058@aer.ca</u>.

#### 3.2.1 Serious Discrepancies

16) The oilfield waste receiver must notify the waste generator and the transporter within 24 hours of finding a serious discrepancy regarding the quantities or characteristics of the waste shipped relative to what was received.

A serious discrepancy is one that may have resulted in an impact to the environment (e.g., spills, leaks, waste that did not arrive at the intended receiver) or one where the waste received differs significantly from the waste sent by the generator.

- 17) Upon being notified or becoming aware of a serious discrepancy, the oilfield waste generator must notify the AER at <u>Directive058@aer.ca</u> of the discrepancy as soon as possible by the quickest, most effective means available, investigate the discrepancy, and take corrective action.
- 18) In cases where a serious discrepancy is the result of an activity by the transporter (e.g., truck spill), the oilfield waste generator must have procedures in place for the transporter to contact them within 24 hours of the occurrence.

#### 3.3 Waste Tracking and Document Retention

- 19) The oilfield waste generator must track, using a system of their choice, the handling, movement, treatment, and disposal of wastes from the initial point of generation through to final **disposition**, including the quantities and characteristics of both DOW and non-DOW.
- 20) If the oilfield waste is shipped to a facility (e.g., storage or transfer station) prior to final disposition, the oilfield waste generator must obtain the details of the final disposition from the waste receiver (cradle-to-grave waste management).
- 21) The oilfield waste generator must retain the shipping documents (e.g., the waste form) and tracking information for a minimum of two years.
- 22) The oilfield waste receiver must retain copies of all dockets for materials received and shipped for a minimum of two years on site or at the local field office *unless* the activity has to be reported through Petrinex, in which case the copies must be retained for a minimum of

five years as per <u>Directive 047</u>: Waste Reporting Requirements for Oilfield Waste Management Facilities.

#### 3.4 Oilfield Waste Disposition Reports

The oilfield waste disposition (OWD) report is an annual summary of the types and quantities of oilfield wastes, the points of generation or consolidation, and the specific disposal or treatment methods used.

The AER may request the annual OWD report, or portions of it, at any time during the current year for the previous two calendar years.

- 23) The oilfield waste generator must electronically submit the OWD report through the designated information submission system within 45 calendar days of a request from the AER. Refer to <u>Directive 030</u>: Digital Data Submission of the Annual Oilfield Waste Disposition Report for what to include and how to submit the report.
- 24) Within the OWD report, the oilfield waste generator must include
  - a) all DOWs,
  - b) all waste that may be a DOW (i.e., identified as "may be a non-DOW" or "testing required" in appendix 2), and
  - c) any non-DOWs requested by the AER.
- 25) For the OWD report, the oilfield waste generator must use the waste codes from appendix 2 and the descriptors for the disposal or treatment methods in appendix 3 of this directive.
- 26) The oilfield waste generator must report solid oilfield waste in tonnes and liquid oilfield waste in cubic metres in the OWD report, and therefore may need to convert the volumes recorded in the waste form. If known, the actual density of the oilfield waste should be used for the conversion.

#### 4 Oilfield Waste Management Activities That Do Not Require Approval

If the duty holder meets the requirements in this section, an approval is not required.

#### 4.1 One-Time On-Site Biodegradation

Duty holders may biodegrade their oilfield waste on site via one-time land treatment and biopiles or biocells.

The duty holder has five years (from commencement of treatment) to successfully treat the waste.

- 27) The duty holder must not use treatment techniques that will prevent the site from meeting reclamation certificate requirements.
- 28) The duty holder must remove unsuccessfully treated waste (i.e., waste not treated within five years) and send it to an approved waste management facility for further management.

Only hydrocarbon-contaminated soils that are suitable for biodegradation may be sent to AEPregulated land treatment facilities.

29) The treatment area must be located in an area that is not subject to seasonal flooding and that is at least 100 m from a body of water or a domestic use well, and the treatment area's base must be at least 1 m above the seasonal high groundwater table.

The AER expects the soils beneath the treatment area to have a hydraulic conductivity of  $10^{-5}$  cm/s or less as measured in situ.

- 30) The duty holder must only treat oilfield wastes that
  - a) are biodegradable in the soil,
  - b) are soils or **sludges** contaminated by unrefined hydrocarbons from spills and leaks or from pits and ponds, and
  - c) create no off-site odour.
- 31) The duty holder must not aerate the waste as a means to reduce contaminate levels.
- 32) The duty holder must treat the waste
  - a) on the site it was generated, or
  - b) on another site within the same production system.

In situations where a contaminant plume is migrating off a well or facility site or the contamination is from a pipeline release, it is acceptable to dig up the off-site contaminated soil and land treat it on the site from which the spill originated.

- 33) If the waste is being treated at another site within the same production system, the duty holder must notify the AER at <u>Directive058@aer.ca</u> no later than 10 business days before the start of biodegradation at the site.
- 34) The notification must include biodegradation in the subject line and the company name, locations of the source site and treatment site, and the biodegradation start date in the body of the email.

#### 4.1.1 Land Treatment

On-site land treatment is the planned and controlled mixing of oilfield wastes with a receiving soil in which the inherent soil processes are used to biodegrade, transform, and assimilate the waste constituents.

- 35) If the duty holder chooses to land treat oilfield waste, the maximum predicted time to successfully reduce the hydrocarbon concentrations in the treatment zone must not exceed five years.
- 36) The duty holder must obtain landowner and occupant consent if the waste is being treated on a different site than where it was generated.
- 37) Land treatment must occur only within the shallow subsoils of the site.
- 38) The land treatment area must not exceed a 5 per cent slope.
- 39) The waste volume must not exceed the amount that can be treated in a single application.
- 40) The duty holder must not apply oilfield waste to a land treatment area from October 15 to April 30, during rainfall periods, or when the soil is saturated with water, is ice- or snow-covered, or is frozen.
- 41) The duty holder must analyze a representative sample of the waste and the receiving soil for the following parameters to determine whether the waste and soil are suitable for land treatment:
  - pH
  - electrical conductivity (EC)
  - sodium absorption ratio (SAR)
  - total metals (as per <u>Alberta Tier 1 Soil and Groundwater Remediation Guidelines</u>)
  - hydrocarbons (i.e., benzene, toluene, ethylbenzene, xylene [BTEX], and petroleum hydrocarbon fractions F1 to F4) (*waste only*)
  - bulk density (*waste only*)

- major ions (e.g., calcium [Ca], magnesium [Mg], sodium [Na], and chloride [Cl])
- extractable organic halogen (*waste only*)
- soil particle size (e.g., fine or coarse grained) (receiving soil only)
- 42) The receiving soil (0 to 15 cm depth) before the waste is mixed in must not exceed Tier 1 soil remediation guidelines for EC, SAR, metals, and pH for the applicable land use.
- 43) The duty holder must not land treat waste that contains more than two parts per million (ppm) organic halogen.
- 44) The waste must not be mixed deeper than 15 cm into the receiving soils.
- 45) The maximum spread rate must not exceed 75 kg waste per square metre (750 tonnes per hectare) or a waste to soil mix ratio of 1:4 by volume.
- 46) The duty holder must manage all leachate generated as an oilfield waste.
- 47) The duty holder must analyze the treatment zone to confirm that the waste was successfully treated. Land treatment of the waste is considered a success when the treatment zone (i.e., soil/waste mix) meets all of the following:
  - a) Tier 1 guidelines for the applicable soil particle size and land use, including those for metals, EC, and SAR
  - b) total petroleum hydrocarbon concentration (sum of BTEX and F1 to F4 hydrocarbon fractions) of less than or equal to 2 per cent by mass
  - c) pH between 6.5 and 8.5
- 48) The duty holder must document the following information and retain the documentation until a reclamation certificate for the site has been issued:
  - a) soil horizon used for the treatment zone
  - b) soil classification of the treatment site to the subgroup level (*The Canadian System of Soil Classification*)
  - c) number, location, and depth of samples taken to characterize the treatment area
  - d) analytical results from the samples (i.e., background soil conditions)
  - e) sketch of the site identifying the treatment area and other key features such as slope topography and drainage features
  - f) area of land used for land treatment
  - g) volume of waste that was land treated (cubic metres)
  - h) oilfield waste spread rate

- i) date of initial placement of waste
- j) photo of the treatment area
- k) estimated biodegradation period (years)
- 1) description of application method and depth of application
- m) amendments added to the treatment area (types, rates, and frequency)
- n) the volume of collected leachate and the method used to manage it
- o) treatment zone analyses (pH, EC, SAR, total metals, and hydrocarbons) confirming that land treatment was a success

#### 4.1.2 Biocell or Biopile

Waste biodegradation is the reduction of organic constituents by an aerobic microbial process. Optimal conditions for microbial activity (e.g., temperature, pH, moisture, nutrient, and oxygen levels) and a degradable, non-toxic organic constituent are needed for successful waste biodegradation. Carbon dioxide, water, and non-toxic residue compounds are the expected byproducts of the microbiological process.

The duty holder may biodegrade hydrocarbons in oilfield waste using a one-time on-site biocell or a biopile. If the biocell or biopile will be used more than once or for longer than five years, see section 7.4.

One-time biocells and biopiles are constructed on an **impervious liner** or base pad on the ground surface with the waste material placed in windrows or in a pile. A biocell also includes a walled containment system.

Moisture and nutrients can be applied topically or, along with air to sustain the microorganisms, through perforated pipes laid within the piled waste material. Some designs involve covering the pile to collect off-gases such as highly volatile organics or carbon dioxide. Carbon dioxide monitoring can aid in determining the activity levels of the microorganisms responsible for biodegradation; the need for additional nutrients, air, or moisture; or the status of biodegradation.

- 49) Biocells and biopiles must include a containment device and a leachate collection system that collects all leachate from the treatment activities and all precipitation that enters the containment area.
- 50) The containment device must
  - a) have a minimum 15 cm high curbed impervious liner (primary containment) as per <u>Directive 055</u>: Storage Requirements for the Upstream Petroleum Industry;
  - b) be constructed of steel, plastic, or fibreglass-reinforced plastic; or

- c) be a specifically prepared surface. The surface option can only be used if the contaminants in the waste are relatively nonleachable (i.e., the waste does not exceed an EC of 4 decisiemens per metre, a SAR of 6, and a hydrocarbon concentration of 2 per cent by mass, and metal concentrations do not exceed Tier 1 criteria) and the soil at the site has a hydraulic conductivity 10<sup>-6</sup> cm/s or less measured in situ.
- 51) If a specifically prepared surface is chosen as the containment device, the duty holder must remove the A and B soil horizons and prepare the C soil horizon for the base pad.
- 52) The duty holder must manage the fluids collected in the leachate collection system by either
  - a) irrigation within the containment device provided that the fluid does not hinder the biodegradation process or create a soil quality problem, or
  - b) injection into an approved disposal well as per <u>Directive 051</u>: Injection and Disposal Wells Well Classifications, Completions, Logging, and Testing Requirements.
- 53) The duty holder must analyze representative waste samples prior to the start and at the end of the biodegradation process for the following parameters:
  - pH
  - EC
  - total metals (as per Tier 1)
  - hydrocarbons (i.e., BTEX and F1 to F4 hydrocarbon fractions)
  - major ions (e.g., Ca, Mg, Na, and Cl)
  - extractable organic halogen
- 54) The duty holder must use the analytical results to confirm the treated material's suitability for its intended use.
- 55) The duty holder must remove the biodegraded or partially biodegraded oilfield material at the end of treatment or within the maximum allowable five-year timeframe, whichever is reached first, for further treatment or disposal, or if appropriate, for use as fill material on the originating site or another site within the same production system.
- 56) The duty holder must close the one-time, on-site biocell or biopile treatment area by removing the material, removing the containment device and leachate collection system, and returning the treatment area to equivalent land capability.
- 57) The duty holder must document the following information:
  - a) the location where the biocell or biopile was used
  - b) start date of treatment

- c) the analyses of the parameters of the original waste and the final treated material
- d) the biocell or biopile construction details
- e) the volume of waste and location of the originating site
- f) the types, rates, and frequency of any amendments added to enhance the biodegradation process
- g) the volume of leachate collected and how it was disposed of
- h) the name and location of the site or facility where the treated material was sent for final disposition or for further treatment
- i) confirmation that the biocell or biopile has been closed
- 58) The duty holder must retain all documentation on site for a minimum of two years after the treated material has been removed.
- 4.2 Mobile Thermal Treatment of Oilfield Wastes

**Mobile thermal treatment units** are regulated by AEP. Duty holders that have received approval from, or have been registered with, AEP may use these units at AER-regulated sites provided that all operations comply with

- the operating requirements of the AER-licensed or -approved site, including any site-specific conditions; and
- the mobile thermal unit licence, approval, or registration.
- 59) If the mobile thermal unit is expected to operate for more than six months, the duty holder must review the possible environmental impacts of the unit with the AER before operations exceed six months.
- 60) The duty holder must thermally treat only oilfield wastes originating from the site where the mobile thermal unit is located or from sites within the same production system.

Note: Since the terms DOW and hazardous waste are synonymous, a mobile unit approved to handle hazardous waste may be used for DOW.

#### 4.2.1 Notification of Operations

61) The duty holder must notify the AER at <u>Directive058@aer.ca</u> and all landowners and residents within 1.5 km of the mobile thermal unit at least 30 days before mobilizing the unit. If the AEP licence, approval, or registration has more stringent public notification requirements, the duty holder must follow those.

- 62) The notification must include
  - a) the AEP licence, approval, or registration number and the operator of the mobile thermal unit;
  - b) the AER licence or approval number and legal land location of the site where the mobile thermal unit will operate;
  - c) the volumes, types, and sources of the oilfield waste to be treated;
  - d) the final disposition of the treated material; and
  - e) the duration of the mobile thermal treatment activity.
- 63) At least 48 hours before running the mobile treatment unit, the duty holder must notify the local AER field centre that operations will be starting.

#### 4.3 Movement of Oilfield Waste From Remediation or Reclamation Activities

The duty holder may move oilfield waste from remediation or reclamation activities from one site to another for temporary storage as per *Directive 055* or one-time treatment if

- the originating AER site (e.g., battery, well site) is not suitable for managing the waste, and
- the other site is an AER-regulated site within the same production system.

This type of oilfield waste includes contaminated soils, sludges, and waters from earthen pit/pond reclamation, spill reclamation, or tank reclamation.

#### 5 Alternative Waste Management Activities

As per section 8.152 of the *OGCR* and section 64 of the *GRDR*, the duty holder, through the designated information submission system, must apply for approval to use alternative storage, treatment, or disposal to that prescribed in this directive. Examples of alternatives include the following:

- one-time temporary variance to the requirements for a waste management activity
- one-time temporary variance to approval conditions (e.g., accepting waste not included in the approval during an emergency)
- managing an oilfield waste in a manner not specified in this directive (e.g., volatilization, boiling or heating for volume reduction, solvent extraction)
- conducting a pilot, including testing a technology for waste management
- 64) The duty holder must include the following in the application:
  - a) the legal land description of the well or facility where the activity will take place and the corresponding AER licence or approval number
  - a description of the activity and how it varies from existing oilfield waste management activities (if applicable), including its purpose and the criteria that will be used to measure its success
  - c) the proposed start date and the anticipated duration (e.g., weeks, months) of the activity
  - d) the volumes and types of oilfield waste to be managed or treated, including a description of the waste acceptance procedures to verify composition, volume, characterization, and classification
  - e) a description of how the residual liquids or solids will be managed
  - f) a plot plan identifying the location of all infrastructure (e.g., storage systems, equipment) associated with the activity and a process flow diagram (if applicable) for the activity
  - g) a description of related storage systems as per Directive 055
  - h) a description of the record-keeping program
  - i) any other relevant information to support the application

- 65) If an approval is granted for a pilot, the duty holder must complete a summary report containing the following information upon completion of the activity, retain it for two years, and make it available to the AER upon request:
  - a) the total volume of each waste type managed
  - b) the volume of by-products and residuals generated, as well as where these materials were disposed of
  - c) any operational problems encountered and how they were overcome
  - d) whether the activity was successful, including the data and rationale used to make this determination
  - e) confirmation that the associated surface infrastructure was dismantled and the necessary remedial work to mitigate impacts caused by the activity was completed

#### 6 Oilfield Waste Management Facilities and Oilfield Waste Management Components

This section sets out requirements that cover the full life cycle of an oilfield waste management facility or an oilfield waste management component from preapplication through to closure. It does not, however, cover activity-specific requirements (see section 7) or application requirements (see section 8).

Under the *Oil and Gas Conservation Act*, a duty holder must apply for approval of an oilfield waste management facility.

A duty holder proposing a waste management activity at a site can apply for approval of an oilfield waste management component if

- the well or facility is licensed or approved under the OGCR;
- the site is active (i.e., it has not been designated as RecExempt, Cancelled, Abandoned, or RecCertified); and
- the duty holder is managing oilfield waste that was generated at that site and other sites within the same production system.

If the well or facility is licensed under the *GRDR*, an oilfield waste management component is not permitted.

Table 1 explains the differences between an oilfield waste management facility and an oilfield waste management component.

- 66) Oilfield waste management facilities and oilfield waste management components must be designed, constructed, operated, and closed by **qualified persons**.
- 67) The duty holder must ensure that all required approvals, licences, and permits are available on site or at the field or plant office.
- 68) The total annual volume of **non-oilfield waste** received at an oilfield waste management facility must not exceed 25 per cent of the total annual volume of oilfield waste received.

	Facility	Component
Location	Standalone site	On an active site licensed or approved under the OGCR
Site-specific liability assessment	$\checkmark$	
Public notification	$\checkmark$	
Activity		
Waste processing (including surface infrastructure for waste caverns)	$\checkmark$	$\checkmark$
Waste storage excluding water for reuse	$\checkmark$	$\checkmark$
Storage of water for reuse	$\checkmark$	
Waste transfer	$\checkmark$	
Surface facility associated with disposal wells (Class Ia or Ib)	$\checkmark$	$\checkmark$
Biodegradation (permanent biopiles or biocells)	$\checkmark$	$\checkmark$
Oilfield landfilling	$\checkmark$	
Thermal treatment (limited to first party and on an AER-licensed or AER-approved oil and gas site)	$\checkmark$	$\checkmark$
Drilling fluid reuse and recycling	$\checkmark$	
Other activities to process, treat, store, dispose of, or recycle oilfield waste	$\checkmark$	$\checkmark$

### Table 1. Differences between an oilfield waste management facility and an oilfield waste management component

#### 6.1 Participant Involvement

The participant involvement process is set out in *Directive 056*: *Energy Development Applications and Schedules*, section 3.

The duty holder must meet the consultation and notification requirements set out in *Directive 056* based on the following table for an oilfield waste management facility.

Facility description	Personal consultation and confirmation of nonobjection	Notification
Facility not accepting H <sub>2</sub> S material	<ul><li>Landowner and occupants</li><li>Residents within 0.5 km</li></ul>	<ul> <li>Crown disposition holders</li> <li>Local authority</li> <li>Landowners, occupants, and urban authorities within 1.5 km</li> </ul>
Facility accepting H <sub>2</sub> S material	<ul><li>Landowner and occupants</li><li>Residents within 0.5 km</li></ul>	<ul> <li>Crown disposition holders</li> <li>Local authority</li> <li>Landowners, occupants, and urban authorities within 2.0 km</li> </ul>

Table 2.	Notification	and consultation	for an	oilfield waste	management facility
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A participant involvement program is typically not required for oilfield waste management components since they must be located on a portion of an active AER-licensed or -approved upstream petroleum site.

#### 6.2 Siting Criteria

- 69) The duty holder must consider site location when designing an oilfield waste management facility or oilfield waste management component. At a minimum, the following requirements must be met:
  - a) The site must be chosen so as to minimize the risks to human, animal, and plant health and to the environment (including soils, surface water, and groundwater) during the entire life cycle of the facility.
  - b) The site must not be within 100 m of a domestic use water well or any water body as defined in *Directive 056*.
  - c) The site must avoid drainage ways, areas subject to seasonal flooding, environmentally sensitive areas, and areas where the public would be directly affected.

#### 6.3 Site Assessment

- 70) The duty holder must conduct and document a site assessment consisting of both a regional assessment and a site-specific investigation for an oilfield waste management facility.
- 71) The site assessment must be planned, conducted, and certified by a qualified person.

The duty holder may be directed by the AER to complete portions of the site assessment for an oilfield waste management component.

#### 6.3.1 Regional Assessment

The purpose of the regional assessment is to gain a preliminary understanding of the soil characteristics, geology, groundwater chemistry, and direction of groundwater flow within a 3 km radius of the facility site.

- 72) The regional assessment must include the following:
  - a) a detailed topographic map that shows all local surface water bodies, soil types and distribution, and any nearby operations that may affect the quality or flow of groundwater, such as industrial facilities, waste transfer stations, and landfills
  - b) a description of the geology (surficial deposits and underlying bedrock) and hydrogeology based on information available in the public domain, such as published reports, maps, aerial photos, water well records, and research papers
  - c) surface water users based on government records
  - d) groundwater users and the depths, specific yields, and water quality of the aquifers being used based on government records

#### 6.3.2 Site-Specific Investigation

The purpose of a site-specific investigation is to establish the **background conditions**, reconcile the information gathered during the regional assessment with the site-specific conditions, and determine the placement of groundwater monitoring wells.

- 73) The site-specific investigation must include the following:
  - a) surface and near surface features, such as the natural slope of the site
  - b) existing or potential sources of contamination and any manmade or natural features that may act as conduits for contaminant migration
  - c) surface drainage patterns and locations of all surface water
  - d) locations of pipelines, utility lines, conduits, pits, and tanks
  - e) locations of buildings, loading facilities, and storage areas
  - f) locations of disposal or source wells
  - g) locations of existing or abandoned monitoring wells or standpipes
  - h) areas containing buried fill material or waste

- i) areas of extensive or frequent spills
- j) the soil characteristics, including
  - i) the geological parent materials, thickness, and type and depth of genetic horizons
  - ii) physical characteristics, including texture (e.g., coarse or fine grained), evidence of fracturing, internal drainage characteristics, and an estimate of moisture content
  - iii) background chemical characteristics, including test results for the following parameters and for any additional site-specific parameters of concern:
    - pH
    - EC
    - major ions (e.g., Ca, Mg, Na, Cl, potassium [K], sulphate [SO<sub>4</sub>])
    - cation exchange capacity
    - metals
    - BTEX
    - petroleum hydrocarbon fractions F1 to F4
    - sodium adsorption ratio
- k) background groundwater conditions, including test results for the following parameters and for any additional site-specific parameters of concern:
  - i) pH
  - ii) EC
  - iii) major ions (e.g., Ca, Mg, Na, K, Cl, SO<sub>4</sub>, nitrite, nitrate)
  - iv) dissolved metals
  - v) BTEX
  - vi) petroleum hydrocarbon fractions F1 to F4

The background soil and groundwater conditions should not exceed the *Alberta* <u>*Tier 1*</u> and <u>*Tier 2 Soil and Ground Remediation Guidelines*</u>.

- 1) a description of the hydrogeology, including
  - i) the type, thickness, and distribution of each stratigraphic unit
  - ii) the depth of the water table (i.e., shallowest water-bearing zone)
  - iii) an estimate of the moisture content and its variation in the unsaturated zone

- iv) measured hydraulic conductivity of the first saturated stratum; including the raw test data and method of analysis
- v) the horizontal and vertical direction, rate, and approximate velocity of the groundwater
- vi) local groundwater discharge and recharge areas within 3 km of the site

#### 6.4 Groundwater Monitoring and Reporting

- 74) The duty holder must have a site-specific groundwater monitoring program for the following oilfield waste management facilities to provide an early indication of potential adverse effects on groundwater:
  - a) waste processing facilities
  - b) storage facilities managing water for reuse
  - c) storage facilities or transfer stations managing DOWs
  - d) surface facilities associated with a Class Ia disposal well
  - e) biodegradation facilities that do not have secondary containment
  - f) oilfield landfills
  - g) fixed thermal treatment facilities

The duty holder may also be required by the AER to implement a groundwater monitoring program for a facility not listed above or for an oilfield waste management component if it is warranted by the site-specific investigation.

- 75) The duty holder must select an alternative monitoring program if the results of the site assessment conclude that groundwater monitoring will not provide the necessary early detection of contamination. Examples of alternative monitoring programs include soil vapour surveys, soil sampling surveys, and EC, electromagnetic, or ground-penetrating radar surveys.
- 76) The duty holder must have qualified persons design and implement the network of groundwater monitoring wells in accordance with best practices and industry standards.
- 77) Before construction of the facility, at least four permanent monitoring wells must be installed in locations where they will not be damaged during facility construction.
- 78) At least three of the four permanent monitoring wells must be installed to determine the depth and direction of the lateral groundwater flow in the shallowest water-bearing zone, typically the permanent water table.

- 79) One of these three wells must be placed hydraulically upgradient of the site to provide the background (unimpacted) water chemistry, and one must be placed hydraulically downgradient of the site.
- 80) A fourth well must be installed beside the downgradient well that is most likely to be affected but at a deeper depth in order to measure the vertical hydraulic gradient.
- 81) Additional groundwater monitoring wells must be installed if
  - a) a perched water table exists, or
  - b) if groundwater contamination is detected and delineation is required to determine the vertical and horizontal extent.
- 82) During well installation, the duty holder must
  - a) ensure no contaminants are introduced into the well,
  - b) minimize subsurface material disturbance,
  - c) ensure placement of the well will provide representative samples of groundwater chemistry, and
  - d) prevent contaminants from zones other than the screened interval from entering the well.
- 83) Monitoring wells must be secured and protected from damage and vandalism.
- 84) Monitoring wells that are no longer used as part of the monitoring program, including those that are damaged or inappropriately placed, must be abandoned according to best practices.
- 85) Any new well that is replacing an existing well in the monitoring program must be ready before the next sampling date.
- 86) The duty holder must document their abandonment procedures.
- 87) The duty holder must determine if additional work beyond the minimum outlined in this directive is required and be able to justify why the actions taken at a specific site are sufficient.
- 88) The duty holder must sample each groundwater monitoring well once in the spring and once in the fall and analyze for the same parameters as for determining the background conditions. Additional monitoring may be required depending on the site-specific conditions.
- 89) The duty holder must prepare an annual groundwater monitoring report by March 31 of each year, unless noted below, and retain it on site for five years.

- 90) The groundwater monitoring report must include
  - a) a site map showing the locations of the facility's structures, monitoring wells, and the horizontal direction of the shallow groundwater;
  - b) monitoring results for the previous calendar year and the four years before that for each monitoring well, including groundwater elevation and analyses, in tabular format;
  - c) monitoring results for the previous calendar year and the four years before that from the alternative monitoring program, if applicable;
  - d) a summary of any work done on the monitoring system;
  - e) an assessment of whether the monitoring results indicate there may be groundwater impacts;
  - f) a discussion of the work to mitigate any identified groundwater impacts, including the status of the work (e.g., proposed, ongoing, completed); and
  - g) a trend analysis of the monitoring data.
- 91) If impacts on groundwater are identified, the duty holder within 60 days of the sampling date must
  - a) notify the AER at Directive058@aer.ca, and
  - b) submit a preliminary plan that describes the impacts, including the source of the impacts, any potential for off-site contamination, and how the problem will be addressed.

#### Exception for a storage facility managing water for reuse

- 92) The groundwater monitoring report must be completed and submitted every second year to the AER by March 31 following the start of operations.
- 93) During years that a groundwater monitoring report does not have to be submitted, the duty holder must
  - a) assess the results from the groundwater monitoring data, and
  - b) notify the AER in writing if the assessment indicates a potential for adverse effects and include the monitoring results and assessment.

#### 6.5 Soils Monitoring

- 94) The duty holder must have a site-specific soil monitoring program for oilfield waste management facilities storing water for reuse in an **engineered containment pond**.
- 95) The soil monitoring program must be developed as per the Government of Alberta's <u>Soil</u> <u>Monitoring Directive</u>.

- 96) The duty holder must implement the soil monitoring program once every five years and, as per the *Soil Monitoring Directive*, complete a soil monitoring report.
- 97) If there is an exceedance in any soil quality parameter, the duty holder must implement a soil management program and complete a soil management report, as per the *Soil Monitoring Directive*.

#### 6.6 General Operational Requirements

The following requirements apply to both oilfield waste management facilities and oilfield waste management components unless otherwise indicated.

- 98) The duty holder must install a perimeter fence to prevent unauthorized access (e.g., public, wildlife, livestock) to the oilfield waste management facility.
- 99) The duty holder must maintain on site a copy of the corporate-level emergency response plan, developed as per <u>Directive 071</u>: Emergency Preparedness and Response Requirements for the Petroleum Industry.
- 100) If any monitoring indicates that contamination has occurred, the duty holder must follow AER release reporting requirements.
- 101) The duty holder must control fugitive odours when receiving, processing, treating, and disposing of waste materials.

Fugitive emissions are governed by the Government of Alberta's <u>Alberta Ambient Air Quality</u> <u>Objectives and Guidelines Summary</u> and the AER's <u>Directive 060</u>: Upstream Petroleum Industry Flaring, Incinerating, and Venting.

- 102) If the oilfield waste management facility or oilfield waste management component is approved to handle sour fluids, the duty holder must have extra precautions in place to prevent any fugitive odours.
- 103) The duty holder must incorporate a surface water run-off control system able to accommodate the volume of water from a 1-in-10-year, 24-hour storm for oilfield waste management facilities.

The duty holder may use the collected surface water run-off in the facility's processes with proper authorizations or alternatively surface discharge the water as per *Directive 055*.

The AER expects duty holders to implement a quality assurance and quality control program to verify characterization of incoming waste materials. The AER also expects duty holders to develop a waste management plan for the handling and disposal of **residuals** (i.e., solids and liquids) resulting from the facility's processes.

#### 6.7 Financial Security

The duty holders of oilfield waste management facilities, including oilfield landfills, must meet the financial security requirements as set out in Part 1.1 of the *OGCR* and in *Directive 068: Security Deposits* before the AER will issue an approval or a security refund.

#### 6.8 End of Operations – Closure

104) The duty holder must ensure that the site on which an oilfield waste management facility or an oilfield waste management component is situated will be capable of being reclaimed to conditions suitable for the next intended land use.

As per the <u>Conservation and Reclamation Regulation</u>, oilfield waste management facilities are not included in the definition of "specified lands," and therefore are not subject to the reclamation certification process under that legislation. Oilfield waste management components are subject to the *Conservation and Reclamation Regulation* and the reclamation process of the sites they are on.

Refer to section 9.7 for operational status relating to closure activities for oilfield waste management facilities and components.

- 105) The duty holder must have qualified persons complete the closure activities. If it becomes apparent that future remediation or reclamation work is necessary as a result of activities that occurred on the site during operations or while it was undergoing suspension or closure, the duty holder will continue to be liable for the site.
- 106) The duty holder must carry out the groundwater and soil remediation in accordance with the *Alberta Tier 1* and *Tier 2 Soil and Groundwater Remediation Guidelines*.

#### 7 Oilfield Waste Management Activities That Require Approval

The duty holder must apply for either an oilfield waste management facility or an oilfield waste management component for the following activities unless otherwise noted. The duty holder may also apply for *Directive 056* activities, including custom treating, clean oil terminalling, and Class II fluid injection/disposal, for an oilfield waste management facility.

#### 7.1 Waste Processing

Waste processing changes the physical, chemical, or biological character or composition of waste; separates and recovers specific material from waste; or manufactures a by-product from waste.

Waste processing may involve

- using surface equipment and infrastructure to slurry and inject waste into a waste cavern;
- washing contaminants or residuals off of or out of equipment, piping, and rags to allow for reuse;
- applying methods or techniques to recover crude oil and reduce volumes, alter chemical characteristics, or remove dangerous constituents of the waste prior to final disposal;
- supplying oilfield waste to a manufacturer to use as an ingredient to manufacture a commercial product; or
- distributing or marketing a treated oilfield waste as a by-product.

#### 7.2 Waste Storage and Waste Transfer

Collecting and storing waste until volumes are sufficient for economic transfer to another facility for treatment, processing, recycling, disposal, or reuse are waste storage or waste transfer activities.

107) If the waste to be stored at a site includes waste generated at other sites, the duty holder must apply for an oilfield waste management facility or component.

If the waste is generated by multiple companies and is accepted for transfer, the approval will list the activity as waste transfer rather than waste storage.

The duty holder does not need to apply to store or consolidate small volumes of waste provided that all of the following are met:

- the storage system is a bin or, if the waste contains free liquid or is leachable, a bin and bag system
- the lid of the bin is kept closed
- the total aggregate volume of the storage system at the site does not exceed 10 m<sup>3</sup>

- the storage system is located on an AER-licensed or -approved site
- the waste is generated within the same production system
- the waste is tracked and disposed of or treated in accordance with this directive
- 108) If the duty holder is treating the waste being stored, they must also apply for a waste processing activity. Crushing filters and containers, removing liquids by gravity settling, and adding biocides and fracture treatment proppants are not considered waste processing.
- 109) If a duty holder wants to store water such as produced water, flow back, or leachate for reuse as an alternative to high-quality nonsaline water in hydraulic fracturing operations, they must apply for an oilfield waste management facility with a waste storage activity. Applying for an oilfield waste management component is not an option.
- 110) The duty holder must not dilute water for reuse with nonsaline water during storage.

The duty holder may blend the water for reuse with different types of water before conveyance or directly prior to hydraulic fracturing, but not during storage.

- 111) Water being stored for reuse must be managed as a waste until it has been used.
- 112) For facilities storing water for reuse, the duty holder must meet the following requirements regarding topsoil and subsoil:
  - a) During construction and operation of the storage area, the topsoil and subsoil must be recovered and stockpiled separately.
  - b) The stockpiles must be protected against erosion.
  - c) The recovered topsoil and subsoil must only be used for reclamation of the storage area. This also applies to areas where a natural liner is incorporated into the design.

#### 7.3 Surface Facility Associated With Disposal Wells (Class Ia or Ib)

The deep well disposal of oilfield waste fluids into a Class Ia or Ib well (well class defined in *Directive 051*) requires an approval for both the disposal well and, unless otherwise noted, the surface facility that is associated with the disposal well. Surface facilities include any storage system and the associated piping, processing equipment, and pumps.

113) If the surface facility is receiving waste generated at other sites, the duty holder must apply for an oilfield waste management facility or an oilfield waste management component.

The duty holder does not need to apply for either an oilfield waste management facility or an oilfield waste management component if

- the disposal well is tied into a pipeline originating from an AER-approved facility and there are no additional surface facilities at the disposal well site,
- the waste received for disposal is produced water, or
- the facility is under the jurisdiction of AEP.
- 114) If recovering hydrocarbons, the duty holder must segregate oilfield wastes from non-oilfield wastes upon receipt at a Class Ia well prior to disposal.

#### 7.4 Biodegradation

Biocells and biopiles that are used more than once or for more than five years are permanent structures and are considered to be facilities doing biodegradation. The duty holder must design and operate the biocells and biopiles as permanent infrastructure rather than for one-time use.

- 115) For permanent biocells or biopiles, the duty holder must apply for either an oilfield waste management facility or an oilfield waste management component.
- 116) The duty holder must design permanent biocells and biopiles with either
  - a) a primary containment device, a secondary containment system consisting of an impervious liner, a leachate collection system, and a leak detection system; or
  - b) a primary containment device, a leachate collection system, and a groundwater monitoring system.
- 117) For permanent biocells, the primary containment device must consist of an impervious liner or a tank or a vault of steel or plastic, including fibreglass-reinforced plastic.
- 118) For permanent biopiles, the primary containment device must consist of a curbed impervious liner at least 15 cm in height.

Concrete and asphalt can provide a durable working surface, but as stated in *Directive 055*, these materials are not considered appropriate for use as an impervious liner for primary containment.

- 119) For permanent biocells and biopiles, the leachate collection system must collect all leachate generated from the treatment activities and all precipitation that enters the containment area, and the collected fluids must be managed as oilfield waste.
- 120) The leak detection system must be monitored as per Directive 055.
- 121) Controls must be in place to mitigate any emissions during biodegradation.

The biodegradation process is the same for permanent biocells and biopiles as for one-time biocells and biopiles.

Before the start and at the end of the biodegradation process, the duty holder must analyze representative samples for the parameters in section 4.1.2 except for the following:

- Bulk density does not need to be analyzed before the start or at the end.
- Parameters in the waste that did not exceed the criteria before biodegradation for the intended use or disposition of the treated material do not need to be analyzed at the end of the process.

The initial sampling results are to be used to predict the time to treat the waste to levels suitable for the intended disposition or for reuse. The end results are to be used to confirm if the waste material has been successfully treated.

- 122) The biodegradation process must be completed within five years.
- 123) For each load of oilfield waste treated, the duty holder must document
  - a) the information under requirement 57,
  - b) the leak detection results (if applicable), and
  - c) the groundwater monitoring results (if applicable).
- 124) The duty holder must retain the documentation on site for a minimum of two years after the treated material has been removed.

#### 7.5 Oilfield Landfill

The AER's oilfield landfill requirements are consistent with the *WCR* and the *Standards for Landfills*.

There are three types of landfills in Alberta based on the waste accepted:

- Class I hazardous waste / dangerous waste
- Class II non-hazardous waste / non-dangerous waste
- Class III inert waste
- 125) The duty holder must not dispose of DOW by landfilling unless the landfill is Class I and the waste meets the criteria listed in section 13(2) of the *WCR*.

As per the *<u>Standards for Landfills in Alberta</u> (Standards for Landfills)*, duty holders must not accept liquid oilfield waste for landfilling. Liquid oilfield waste is waste that does not pass the paint filter test<sup>1</sup> before any amendments are added.

- 126) For an oilfield landfill, the duty holder must apply for an oilfield waste management facility if they are landfilling their own oilfield waste.
- 127) The duty holder must locate the landfill on an AER-licensed or -approved site or within the footprint of an AER-approved scheme.
- 128) The duty holder must meet the following sections in the Standards for Landfills:
  - Section 2: Landfill Development and Siting
  - Section 3: Design and Construction
  - Section 4: Landfill Operation
  - Section 5: Monitoring, Analysis, and Corrective Actions
  - Section 6: Final Landfill Closure and Post Closure
  - Section 7: Record Keeping and Reporting, subsections 7.1(c), 7.3, 7.5, 7.6, 7.7, and 7.8

An exception to above is that the AER does not require the duty holder to have a landfill operator certification. However, it is recommended. If there is a conflict between a requirement in the *Standards for Landfills*, this directive, or another AER directive, the duty holder must comply with the more stringent requirement.

The AER expects duty holders that use leachate ponds to meet the requirements (e.g., siting, design, and operations) under *Directive 055*.

- 129) The duty holder must retain the following information until the end of the post-closure period:
  - a) the waste generator identification information, type and volume of oilfield waste, and disposition location within the landfill for each load of oilfield waste
  - b) the results from the technical investigation program
  - c) the results of the groundwater monitoring program

<sup>&</sup>lt;sup>1</sup> Method 9095B: Paint Filter Liquids Test in <u>Test Methods for Evaluating Solid Waste: Physical/Chemical Methods</u> (United States Environmental Protection Agency Publication No. SW-846).
### 7.6 Thermal Treatment

Thermal treatment uses heat to remove or destroy contaminants in oilfield waste and is effective at removing organic constituents in the waste.

130) The duty holder must locate fixed thermal treatment units, small incinerators,<sup>2</sup> and campsite incinerators on an existing site regulated by the AER.

#### 7.6.1 Fixed Thermal Treatment Unit

- 131) For **fixed thermal treatment units**, the duty holder must apply for an oilfield waste management facility.
- 132) Unless the unit has already been approved for the waste, the duty holder must conduct test burns to verify that the waste can be treated while meeting the unit's performance requirements and contaminant emission limits.

The duty holder may be required to complete testing to verify compliance with the operating approval for the thermal treatment process.

- 133) The duty holder must conduct additional testing if
  - a) the facility design or operating conditions change,
  - b) the matrix of the waste feed changes, or
  - c) the principal contaminants in the waste feed changes.
- 134) The duty holder must determine stack emission levels based on the volume and type of waste being treated, the technology being used, and the site-specific requirements.
- 135) The duty holder must give special consideration to air quality issues and dispersion characteristics in the local area when selecting and operating the fixed thermal unit.
- 136) The duty holder must not thermally treat waste that contains polychlorinated biphenyls (PCBs).

The oilfield waste management facility approval may identify other waste-feed restrictions (e.g., **halogenated** organics) depending on the thermal treatment technology being used.

- 137) The duty holder must not stockpile waste waiting for treatment that exceeds six months of processing volumes.
- 138) All thermal treatment equipment must have an automatic alarm system that is triggered when preset levels of key design parameters are not met, including when an upset is imminent.

<sup>&</sup>lt;sup>2</sup> Referred to as "small batch feed incinerators" in the 2006 edition of *Directive 058*.

139) Written operating practices for receiving, unloading, and segregating waste and for responding to automated alarms must be maintained on site.

As per requirement 5, the duty holder must characterize and classify waste prior to mixing. Conditioning the waste feed (e.g., thorough mixing with processed or uncontaminated materials) is allowed only for operational purposes.

The AER expects liquid residuals to be collected and reused in the thermal treatment process as much as possible. Collected liquids that are not reused may be recycled as appropriate.

- 140) The duty holder must identify signs of wear, leaks, spills, corrosion, hot spots, and potential malfunctions by completing regular inspections of the thermal treatment equipment during operating periods. The duty holder should record the inspection results and any operational changes that were completed to correct deficiencies in the daily operations log.
- 141) The duty holder must continuously monitor the parameters that indicate the successful destruction or removal of contaminants and successful pollution control.
- 7.6.2 Small Incinerator
- 142) For small incinerators, the duty holder must either
  - a) apply for an oilfield waste management component if the waste being managed includes waste generated off site, or
  - b) notify the AER at <u>Directive058@aer.ca</u> if the waste being managed is only generated on site.
- 143) If notification is required, it must be provided at least 30 days before the start of operations and include the following:
  - a) the legal land description and the licence or approval number of the site the small incinerator is located on
  - b) a technical assessment of the small incinerator, signed and stamped by a qualified person (e.g., professional engineer, the manufacturer, or equipment supplier), that includes
    - i) the make, model, and serial number of the incinerator
    - ii) the incinerator type
    - iii) the design and number of the combustion chambers
    - iv) the operating temperatures of the combustion chambers or, if applicable, the operating temperatures of the desorption and combustion chambers of a thermal desorber

- v) any modifications made to the small incinerator
- vi) the equipment to be used in conjunction with the small incinerator
- vii) the actual and rated capacity, as specified by the manufacturer, in kilograms per hour
- viii) the source, quantity, and chemical characteristics of each oilfield waste expected to be processed
- ix) the proposed disposition of any waste resulting from the operation
- x) monitoring to be conducted
- 144) If the duty holder is using a small incinerator, the following must be met:
  - a) The **incineration** site must be located a minimum of 1.5 km from any residences or public facility unless otherwise authorized by the AER.
  - b) The surface terrain at the incinerator site must allow for the prompt and effective cleanup of all materials that may spill or leak during waste storage and disposal operations. The cleanup materials must be managed as oilfield waste.
- 145) Ash resulting from the incineration of oilfield waste must be managed as oilfield waste. Ash may contain significant levels of metals, and landfill acceptance may be subject to passing the toxicity characteristics leaching procedure. The incinerator ash should be stored and transported in enclosed containers.

The metal filter cores may be recovered and sent to a scrap metal recycler if appropriate.

- 146) The duty holder must follow the sections listed below in the Government of Alberta's <u>Code</u> of <u>Practice for Small Incinerators</u>:
  - Section 3: Analytical Requirements
  - Section 5: Design Requirements
  - Section 6: Operational and Emission Requirements
  - Section 7: Monitoring Requirements
  - Section 10: Record Keeping Requirements

If similar requirements are set out in this section of this directive, the more stringent ones must be followed.

## 7.6.3 Campsite Incinerator

The AER expects campsite incinerators to be used only if access to an approved disposal site is not available.

If a campsite incinerator is used, the duty holder does not need to get approval from the AER or notify the AER provided that the campsite incinerator is

- capable of burning the waste to an inert ash,
- incorporates a stack of suitable height and an effective spark arrestor,
- maintained in good operating condition such that warped components, leaks, or other damage is repaired as soon as is practicable,
- provided with underfire air, and
- provided with overfire air for all incinerator types except controlled air units.

## 7.7 Drilling Waste Reuse and Recycling

147) If receiving drilling waste from other duty holders at a standalone site or at a segregated area on a site for reuse or recycling, the duty holder must apply for an oilfield waste management facility (referred to as a drilling fluid facility in the approval).

## 7.8 Reporting and Document Retention

For biodegradation and oilfield landfill, refer to the specific activity section for reporting requirements.

For waste storage, including water for reuse; waste transfer; and fixed thermal treatment, monthly and annual reporting is required as described below.

148) By March 31 of every year, the duty holder must summarize the following information for the previous calendar.

## For waste storage, waste transfer, and fixed thermal treatment:

- a) types of oilfield waste processed monthly, including for each receipt of waste material, the volume, source, generator, waste characterization, and date received
- b) an opening and closing inventory balance for each month identifying the total volumes of waste received; the total volumes of waste sent for treatment, processing, recycling, disposal, or reuse; and the name and location of the receiving facility or location
- c) if waste is being thermally treated, the total volume of waste waiting to be treated
- d) a summary of the results of any monitoring programs

#### For waste storage of water for reuse only:

- e) manufacturer and construction QA/QC reports, including as-built drawings of the storage system
- f) a summary of operations, including records on the quality and quantity of water released to the environment, leak detection, action leakage rate, and any corrective actions taken
- g) an assessment of the performance of the storage system, including the effectiveness of its wildlife and bird controls
- h) information indicating the ongoing need for the storage facility
- i) the soil monitoring report (completed every five years)
- j) the soil management report, if applicable

#### For fixed thermal treatment only:

- k) the amount of residual material (liquids and solids) disposed of monthly, the name and location of the disposal facility, and the volume of residuals stored on site
- a summary of the operational performance of the continuous thermal treatment process and emissions monitoring, including an explanation of any incidents lasting more than 60 minutes when operating parameters were not met or emissions limits were exceeded
- m) copies of all analyses conducted for feed characterization
- 149) The annual report must be retained for a minimum of two years for waste transfer and waste storage and a minimum of five years for fixed thermal treatment and submitted on request to the AER.
- 150) The annual report for storage of water for reuse must be submitted yearly to the AER by March 31 for the first five years of operating life.
- 151) The monitoring data (e.g., leachate, wildlife data) and associated documents for all activities other than biodegradation and oilfield landfill must be retained for a minimum of five years, but preferably for the lifetime of the site.

## 8 Applications for New Oilfield Waste Management Facilities and Oilfield Waste Management Components

This section sets out the specific information that needs to be submitted in an application. The information cannot be provided simply by referring to a page or section of an attached report. An attached report, however, may be cited for additional information.

### 8.1 General Application Requirements

- 152) The duty holder must provide the following information when applying to construct and operate an oilfield waste management facility or an oilfield waste management component:
  - a) the geographical area that would be serviced
  - b) the legal land description and, for an oilfield waste management component, the existing well site or facility licence number or *EPEA* approval number for the site
  - c) the current land use and zoning for the site
  - d) confirmation that participant involvement was completed as per this directive
  - e) whether the waste to be accepted will be the duty holder's own waste or will be from multiple generators
  - f) the activities that will be conducted (see section 7 for list of activities)
  - g) a facility plot plan clearly showing the location of
    - i) all equipment on site, including disposal and source wells;
    - surface improvements (as defined in *Directive 056*), water bodies, and vegetation for at least 100 metres past the edge of the lease boundaries to demonstrate off-site setback requirements are met; and
    - iii) groundwater monitoring wells and horizontal direction of the shallow groundwater flow
  - h) a list of storage systems, including any identification numbers and capacity in cubic metres
  - i) process flow diagrams that clearly identify process equipment (e.g., centrifuges, shaker systems), measurement points as required under <u>Directive 017</u>: Measurement Requirements for Oil and Gas Operations, storage systems, sources of receipt and deliveries, and all fluid lines, disposal wells, flare lines, and vent points
  - j) a description of the treatment and process technologies, from receipt to disposition of waste, that aligns with the process flow diagrams
  - k) a list of all proposed waste streams to be received under each activity

- a list of the facility identifiers (e.g., ABWP, AWIF), as per <u>Directive 007</u>: Volumetric and Infrastructure Requirements and Directive 047
- m) a description of the operational procedures to manage waste streams that may or will contain hydrogen sulphide (e.g., routed through a vapour recovery unit and either a flare stack or scrubber)
- n) any waste streams that are non-oilfield waste or **imported oilfield waste** and the information under section 9.4
- o) in a table, from the regional assessment,
  - i) the surface and groundwater users, and
  - ii) the depths, specific yields, and water quality of the aquifers being used
- p) a description of the regional hydrogeology and geology from the regional assessment
- q) a description of soil characteristics from the site-specific investigation
- r) groundwater details from the site-specific investigation
- s) in a table, the monitoring well construction details
- t) rationale for the locations, depths, and screen intervals of the monitoring wells
- u) a description of any alternative monitoring program
- v) copies of any waivers obtained from the AER

For an oilfield waste management facility, the duty holder must also complete a site-specific liability assessment, as per *Directive 011: Estimated Liability*. The duty holder should review *Directive 001: Requirements for Site-Specific Liability Assessments*, and the *OGCR* to ensure that all the required information is submitted with the application.

In accordance with *Directive 068* and the *OGCR*, duty holders must be prepared to post financial security upon AER request, which must occur before the AER will issue an approval.

In addition to the general application requirements in this section, the duty holder must provide activity-specific application information as per the following sections.

### 8.2 Waste Processing

- 153) If the waste processing is associated with cavern disposal and the cavern disposal scheme has been approved, the duty holder must include the scheme approval number with the application.
- 154) If the waste processing manufactures by-products to sell, a safety data sheet for each by-product must be included for approval.

## 8.3 Waste Storage and Transfer Stations

- 155) If the waste storage is for storing water for reuse, the following information must be included in the application:
  - a) the need for the storage facility
  - b) a summary of other sites assessed and justification for the chosen site
  - c) the proposed storage system design, including supporting diagrams, and a statement that the design is appropriate for how long the system will be used for and the fluids that will be stored
  - d) the source of the waste (i.e., the duty holder or another oil and gas company)
  - e) who will be reusing the waste (i.e., the duty holder only, the duty holder and other oil and gas operators, or other oil and gas operators not including the duty holder)

### 8.4 Surface Facility Associated With Disposal Wells

The duty holder may apply for the surface facilities associated with disposal wells either concurrently with the disposal well application or after the disposal well and scheme have been approved.

156) If the disposal scheme has been approved, the scheme's approval number and surface location must be included in the application for surface facilities associated with disposal wells.

### 8.5 Biodegradation (Permanent Biocells or Biopiles)

- 157) The duty holder must include descriptions of the following when applying for a biodegradation facility:
  - a) the oilfield waste sources and typical chemical and physical characteristics
  - b) the proposed biodegradation process, including any amendments that will be added, and the anticipated degradation period for each load of oilfield waste
  - c) the intended use of the treated material
  - d) how any leachate will be managed or disposed of
  - e) the design of the biodegradation facility, including
    - i) the primary containment device,
    - ii) the secondary containment device,
    - iii) the leachate collection system, and

- iv) the leak detection system
- f) how fugitive air emissions will be monitored

#### 8.6 Oilfield Landfill

- 158) The duty holder must include the following information when applying for an oilfield landfill:
  - a) the class of the landfill
  - b) the AER licence, approval, or scheme approval number for where the landfill would be located
  - c) the method for measuring and accounting for the volumes of waste received
  - d) a schematic cross-section of the proposed landfill, including the location of the trench or cell in relation to the seasonal high water table
  - e) the information required under the following sections in the *Standards for Landfills* (if an item does not apply, identify it as "not applicable" with an explanation):
    - Section 2: Landfill Development and Siting
    - Section 3: Design and Construction
    - Section 4: Landfill Operation
    - Section 5: Monitoring, Analysis, and Corrective Action
    - Section 6: Final Landfill Closure and Post Closure

#### 8.7 Thermal Treatment

- 159) The duty holder must include the following information when applying for a fixed thermal treatment facility:
  - a) the proposed uses for the residual solids (e.g., alternative landfill cover, fill material)
  - b) the site-specific emissions criteria with supporting data explaining how the criteria were selected
  - c) a description of the incinerator's design and the manufacturer's specifications, including the make, model number, chamber type, rated capacity, and charging method
  - d) the design and operating limits for the parameters listed below and a discussion of why the limits apply:
    - i) primary chamber temperature, pressure, design volume, and hearth area
    - ii) secondary chamber temperature, pressure, and retention time

- iii) primary air injection
- iv) secondary air injection
- v) auxiliary burner type, primary ignition, secondary afterburner, timer cycle, supply fuel, and type of flame-failure control
- vi) minimum destruction and removal efficiency
- vii) combustion performance parameters, including minimum oxygen level, maximum carbon monoxide level, and minimum incinerator operating temperature
- viii)stack emission levels for opacity, hydrogen chloride, particulates, dioxins and furans, carbon monoxide, carbon dioxide, nitrogen oxides, and sulphur dioxide
- e) a description of the incinerator stack, including its diameter, height above grade, height above roof, distance from the nearest building and the building's height, height of other obstructions, spark arrester, sampling ports, and pollution control equipment
- f) a description of the process monitoring system for the incinerator and of the continuous emissions monitoring system for the stack
- g) a scale drawing of the incinerator showing its internal dimensions, burner locations, charging doors, size and location of test openings, temperature control device, and temperature recording device
- h) a description of the testing to ensure that the required destruction and removal efficiencies and emission limits will be met
- i) a copy of the test burn protocol, including
  - i) waste type and source
  - ii) waste-feed characterization, including sampling and analysis methods
  - iii) parameters to be monitored in all effluent streams, including sampling and analysis methods
  - iv) operating parameters such as temperature, air-flow rate, mass-flow rate, waste-feed rate, residence time, total hydrocarbons, and combustion and destruction efficiencies (if applicable)
  - v) the time period for the test
- j) confirmation of a successful test burn
- k) a description of the operational procedures, including
  - i) the method of receiving, storing, and preparing waste for incineration

- a list of the gaseous and particulate substances and their volumes that will be released into the environment as a result of the incinerator's operation, as well as the methods of release and the operational steps to reduce the volumes released
- iii) a discussion of the method to dispose of or treat the liquid and solid residue or ash generated by the incinerator
- 1) a description of the facility's operational safety procedures, as well as the contingency plan to respond to emergencies such as fires or fugitive emissions

### 8.8 Other Oilfield Waste Management Activity

160) Duty holders that want to apply for an oilfield waste management activity that is not described in this directive must provide information on the design features, the operating procedures, and the monitoring systems for the activity, with the level of detail reflecting the scope and complexity of the proposed activity. Alberta Energy Regulator

## 9 Applications to Modify Existing Oilfield Waste Management Facilities or Oilfield Waste Management Components

To modify an existing oilfield waste management facility or an oilfield waste management component, the duty holder, through the designated information submission system, will need to either apply to amend the approval or notify the AER. The sections below indicate which of the two is required based on the modification.

- 161) For modifications that require the duty holder to notify the AER, the notification must be submitted at least 15 business days before starting the modifications.
- 162) For modifications that require the duty holder to amend the approval, the duty holder must not implement the modification until the AER has granted approval. Refer to the AER website for application processing times.

Duty holders do not need to notify the AER or amend the approval for the routine replacement of existing equipment (e.g., pumps, heaters, treaters), including the replacement of one tank for another tank of the same volume provided the dimensions of the new tank do not reduce the secondary containment capacity.

- 9.1 General Application and Notification Requirements
- 163) The duty holder must include the following information when applying to amend an approval or when notifying the AER:
  - a) the approval number and the name of the oilfield waste management facility or oilfield waste management component
  - b) the legal land description and, for a component, the existing licence or approval number of the site
  - c) the purpose and a description of the modification, including the area of the facility where the proposed activity will occur
  - d) updated plot plan (if applicable)
  - e) updated process flow diagram for the entire facility (if applicable)
  - f) updated site-specific liability assessment as per Directive 011, as required
  - g) statement as to whether additional financial security will be required based on an updated site-specific liability assessment; if additional security is required, provide information about the security adjustment, in accordance with *Directive 068*
  - h) confirmation that Directive 055 will be met

- i) any additional tracking, record-keeping, or reporting requirements, including any new facility identifiers
- j) any other information requested by the AER, including during preapplication meetings
- 9.2 Modify a Storage Device
- 164) The duty holder must notify the AER when
  - a) adding or removing storage tanks or aboveground synthetically lined walled storage systems (AWSSs) within an existing tank farm or secondary containment area;
  - b) replacing or upgrading an existing tank farm, AWSS secondary containment area, or bulk pad;
  - c) adding or expanding an existing tank farm, AWSS secondary containment area, or bulk pad; or
  - d) redesignating the storage devices (i.e., changing the identifiers).
- 165) The notification must include the following information, if applicable:
  - a) the number of tanks or AWSSs being added or removed
  - b) the storage device identifier and volume (m<sup>3</sup>) or maximum storage capacity (for solids pad) associated with the storage device being added, removed, or redesignated; if being redesignated, include the previous device identifier and new device identifier
  - c) the dimensions of the new or expanded storage device area
  - d) whether the replacement storage device will be located within the same area or within a different area
  - e) if the replacement storage device is located within a different area,
    - i) confirmation that any materials stored in the existing storage device will be removed within 30 days of the completion of the replacement storage device, and
    - ii) a description, including timelines, of how *Directive 055* requirements for the permanent withdrawal of the existing storage device will be met
  - f) if the existing storage area will be expanded, a description of how the new portion will be tied into the existing containment system (i.e., dikes, liners), and how the dike and liner integrity will be maintained prior to completion
  - g) confirmation that public consultation has been completed
- 166) If the tanks were identified in the original application as future tanks, the duty holder must notify the AER at <u>Directive058@aer.ca</u> once they are put into service.

### 9.3 Add a New Cavern or Disposal Well

- 167) If the existing approval does not include waste processing associated with a cavern or deep well disposal, the duty holder must apply to amend the approval as per section 7.1 and section 7.3, respectively.
- 168) The duty holder must notify the AER once the new cavern or disposal well has been approved and include the legal land location of the cavern or well, the disposal scheme approval number, and the facility ID for the cavern.

#### 9.4 Add or Remove Waste

Whether the duty holder has to apply to amend the approval or has to notify the AER depends on the waste being added or removed.

- 169) For any of the following, the duty holder must apply to amend the approval:
  - a) To add a non-oilfield waste or an imported oilfield waste, *unless* the waste is already included in the approval, in which case the AER must be notified. The notification must provide the same information as that required in applying for an amendment.
  - b) To add **materials requiring special handling**, including naturally occurring radioactive materials (NORMs) and PCBs.
  - c) To add waste containing H<sub>2</sub>S, which will change a sweet facility to a sour facility.
- 170) The amendment application must include the waste management activity associated with the waste, the type of waste being added based on the list in the requirement directly above, and the waste name and waste code from appendix 2.
- 171) The amendment application must also include the following information depending on the waste type:

#### For imported oilfield waste and non-oilfield waste

- a) confirmation that the waste has similar characteristics to the oilfield waste currently approved for the facility
- b) the waste classification (hazardous or non-hazardous)
- c) source of the waste
- d) a description of the acceptance procedures and methods used to verify the characteristics and classification of the waste
- e) if the waste is hazardous, the recoverable material and how will it be recovered
- f) if the waste is being received for consolidation and transfer, the name, location, and approval number of the recycling facility

#### For materials requiring special handling

- g) a description of the materials to be added, including any unique properties or characteristics
- h) source of the materials
- i) a description of the acceptance and handling procedures
- j) name, location, and approval number of the facility where the residual waste will be sent for further treatment or disposal
- k) confirmation that public consultation as per this directive has been completed

#### For waste containing H<sub>2</sub>S

- 1) a description of the waste acceptance and handling procedures
- m) a description of the modifications to accommodate the waste, including odour control during receiving, processing, and disposing of residuals (e.g., vapours routed through a vapour recovery unit or flare stack)
- n) confirmation that public consultation has been completed
- 172) To add or remove any oilfield waste not identified in this section, the duty holder must notify the AER.
- 173) The notification must include
  - a) the waste being added or removed, including its oilfield waste code; and
  - b) the waste management activity associated with the waste.

#### 9.5 Change a Soil or Groundwater Monitoring Program

- 174) The duty holder must apply to amend the approval when making a change to an existing soil or groundwater monitoring program *unless* a new groundwater monitoring well is being added, in which case the AER must be notified.
- 175) The amendment application must include
  - a) a description of the proposed change and the purpose of the change, and
  - b) an updated plot plan, if applicable.
- 176) The notification to add a new groundwater monitoring well must include
  - a) the rationale for adding the well, and
  - b) an updated plot plan showing the well's location.

- 9.6 Add a New Waste Management Activity
- 177) The duty holder must apply to amend the approval when adding a new waste management activity.
- 178) The amendment application must include
  - a) the activity-specific application information (sections 8.2 to 8.8),
  - b) the information from section 9.5 if there are any changes to the groundwater or soil monitoring program, and
  - c) confirmation that public consultation has been completed.
- 9.7 Change the Status of an Oilfield Waste Management Facility or Oilfield Waste Management Component

The status of an oilfield waste management facility or oilfield waste management component must be accurately reflected in the approval.

179) To change the status of the oilfield waste management facility or oilfield waste management component, or a portion of either, the duty holder must apply to amend the approval.

The amendment application must include the information set out below.

- 180) To change the status from operating to suspended, provide
  - a) a description of the work that will be taken to
    - eliminate all inventories (include the volumes of each waste type or material and the types of facilities the inventories will be sent to for treatment, disposal, or recycling), and
    - ii) secure the facility or the relevant portion of it to prevent waste management activities in the suspended area; and
  - b) the timelines for abandonment, decontamination, and surface land reclamation.
- 181) To change the status to abandonment, provide
  - a) the information under requirement 181, if suspension has not already occurred;
  - b) a description of the work to remove associated equipment and structures and to abandon wells and pipelines;
  - c) a description of the work
    - i) to determine the extent of any impacts caused by the waste management activity, and
    - ii) to secure the facility or portion of the facility that will be abandoned; and

- d) the timelines for decontamination and surface land reclamation work.
- 182) To change the status to undergoing closure, provide
  - a) the information under requirements 181 and 182 if suspension or abandonment has not already occurred;
  - b) a closure plan describing
    - i) the environmental site assessment to determine the potential sources, nature, and extent of contamination; and
    - ii) the reclamation work to return the site to equivalent land capability, including timelines; if only a portion of the facility is undergoing closure, indicate if the reclaimed lands will be removed from the facility footprint and used for the next intended land use;
  - c) rationale for any structures or buildings remaining on site; and
  - d) the next intended land use.
- 183) To change the status to undergone closure, provide a closure report that includes
  - a) a summary of the suspension and abandonment work;
  - b) the results from the environmental site assessment, including a discussion about the types and extents of any contamination found;
  - c) a summary of any work completed to decontaminate the site, including confirmatory environmental site assessment work;
  - d) a summary of the surface land reclamation work; and
  - e) details on the post-closure monitoring program, if required, including the time period and type of monitoring.

All work associated with closure activities (i.e., suspension, abandonment, undergoing closure) must be documented.

- 184) To change the status from suspension to operating, provide
  - a) confirmation that public consultation has been completed as per this directive if the entire facility has been suspended for more than one year, and
  - b) a summary of work done and planned for operations to resume.

## 9.8 Transfer of an Oilfield Waste Management Facility

Agreements for the purchase and sale of AER-approved oilfield waste management facilities do not result in a transfer of the associated approval until a transfer application is submitted to and approved by the AER.

185) The duty holder must submit a transfer application in accordance with *Directive 088* for transfer of an oilfield waste management facility.

### 9.9 Add, Expand, or Close a Landfill Cell or Closing a Landfill

186) The duty holder must apply to amend the approval to add, expand (vertically or horizontally), or close a landfill cell or to close the entire landfill.

The amendment application must include the following information.

- 187) For the addition or expansion of a landfill cell, provide
  - a) all of the applicable information detailed in section 8.6 of this directive, and
  - b) if expanding beyond the initial landfill footprint, confirmation that public consultation as per this directive has been completed.
- 188) For the closure of a landfill cell or closure of the entire landfill, provide all of the applicable information detailed in the *Standards for Landfills* pertaining to final cover and final landfill closure and post-closure care.

### 9.10 Add or Expand an Engineered Containment Pond

- 189) The duty holder must apply to amend the approval to add or expand an engineered containment pond.
- 190) The amendment application must include
  - a) all the applicable information in section 8.3, and
  - b) if expanding beyond the initial facility lease boundary, confirmation public consultation as per this directive has been completed.

#### 9.11 Expand Lease Boundaries

- 191) The duty holder must apply to amend the approval to expand the lease boundaries.
- 192) The amendment application must include
  - a) written confirmation from the landowner consenting to the lease expansion;
  - b) an updated plot plan clearly identifying the expanded lease area, including the dimensions;

- c) a detailed description of the oilfield waste management activities proposed in the expanded lease area;
- d) a description of the effects of the lease expansion on the current groundwater and soil monitoring programs (as applicable), including the need for additional groundwater wells and additional site investigation in the area of the expanded lease as per section 6.3.2;
- e) information set out in section 9.5 to support modifications to the groundwater or soil monitoring program; and
- f) the background soil conditions in the expanded area as per section 6.3.2.
- 9.12 Dispose of Residual Wastes by an Alternative Method Not Authorized by the Approval
- 193) The duty holder must apply to amend the approval to dispose of residual waste by a method not authorized in the existing approval.
- 194) The amendment application must include
  - a) a description of the residual waste to be disposed of by the alternative method, including the characterization and classification of the waste;
  - b) the estimated annual volume of residual waste to be disposed of by the alternative method; and
  - c) if the alternative method is occurring off site, the name, location, and operator of the facility; confirmation that the facility is authorized to accept the material; and a description of how the residual waste will be managed.

## 10 Other Waste Management and Disposal Options

### 10.1 Send to an AEP-Regulated Landfill

The duty holder may send only construction and demolition debris, garbage and domestic wastes, and scrap metal to registered landfills in Alberta or landfills currently operating under the <u>Code of</u> <u>Practice for Landfills</u>.

Duty holders are allowed to send oilfield waste to an AEP-regulated Class II landfill if the facility is approved to accept oilfield waste, the oilfield waste does not impact the lifespan of the facility, and the waste does not exceed the limits set out in table 3 for total petroleum hydrocarbons and chloride based on landfill design. Class II landfills approved prior to 1996 often lack an engineered liner and a leachate collection and removal system.

If the facility is a municipal Class II landfill, either (a) the oilfield waste must be of a quality or treated to a quality that allows it to be used (e.g., contaminated soils for cover material), or (b) the facility must have dedicated trenches or cells for oilfield waste.

Table 3. Total petroleum hydrocarbon (	<b>TPH</b> ) and chloride limits for accepting non-dangerous oilfield
waste at Class II landfills	

Landfill design	Oilfield waste quality
Engineered clay or synthetic liner and a leachate collection and removal system	TPH no limit Chloride no limit
Engineered clay or synthetic liner <i>but no</i> leachate collection and removal system	TPH <30 000 mg/kg Chloride <5 000 mg/kg
Natural clay liner <i>but no</i> leachate collection and removal system	TPH <20 000 mg/kg Chloride <3 000 mg/kg

The limits in table 3 address oilfield wastes such as produced sands, drilling mud and cuttings, oily sludges, tank and treater bottoms, and flare pit material, which are often unsuitable for landfilling due to their non- or semivolatile hydrocarbon content or salt content.

## 10.2 Control and Dispose of Returned Radioactive Fracturing Sand

Sand and fluids returned back to surface after fracturing a well are considered oilfield wastes.

The use of radioactive substances and their disposal are subject to regulation and licensing by the Canadian Nuclear Safety Commission in accordance with the <u>Nuclear Safety Control Act</u> and the <u>Nuclear Substances and Radiation Devices Regulations</u>.

#### 10.3 Manage Naturally Occurring Radioactive Materials

NORMs are regulated by the provincial and territorial governments, each having its own specific regulations on the handling and disposal of the material. The <u>Canadian Guidelines for the</u> <u>Management of Naturally Occurring Radioactive Materials</u> has been developed by the Federal Provincial Territorial Radiation Protection Committee to harmonize standards throughout the country and ensure appropriate control over NORMs.

- 195) The duty holder must monitor waste containing NORMs in accordance with the *Canadian Guidelines for the Management of Naturally Occurring Radioactive Materials* and must send the waste to a facility authorized to accept it.
- 196) The waste receiver must apply to the AER for approval to receive oilfield waste containing NORMs for management.
- 197) To ensure worker safety, the duty holder must have in place a management plan for assessing, controlling, and handling NORMs in accordance with provincial <u>occupational health and safety legislation</u>.

#### 10.4 Minimize Waste

The AER expects duty holders to minimize waste production by reducing, reusing, recycling, and recovering waste. Duty holders should ensure effective management strategies are employed to minimize waste. See appendix 4 for examples.

#### 10.5 Manage Drilling Waste

As per the *OGCR*, section 8.151(4), the duty holder must manage drilling waste in accordance with *Directive 050*: *Drilling Waste Management* and this directive.

# Appendix 1 Glossary

adverse effect	As defined in <i>EPEA</i> under section 1(b).
background condition	As defined in <i>Alberta Tier 1 Soil and Groundwater Remediation Guidelines</i> , section 2.4.2, for background concentration.
campsite incinerator	Thermal treatment equipment that has a burning capacity of less than 90.7 kilograms per hour and is used to dispose of a campsite's kitchen waste.
composition	The portion of oil, water, and solid in a given waste as determined by analysis.
equivalent land capability	As defined in the <i>Conservation and Reclamation Regulation</i> under section 1(e).
engineered containment pond	An in-ground storage system engineered to securely contain fluids, as per <i>Directive 055</i> .
facility	As defined in the Oil and Gas Conservation Act under section 1(w).
halogenated	The product of incorporating a halogen (i.e., fluorine, chlorine, bromine, or iodine) into a chemical compound.
impervious liner	Refer to section 4.1 of Directive 055.
impervious liner imported oilfield waste	Refer to section 4.1 of <i>Directive 055</i> . Waste generated from the exploration and production of oil and gas outside of Alberta that has similar characteristics to oilfield waste. Imported oilfield waste that is hazardous needs to contain recoverable material.
impervious liner imported oilfield waste incineration	<ul> <li>Refer to section 4.1 of <i>Directive 055</i>.</li> <li>Waste generated from the exploration and production of oil and gas outside of Alberta that has similar characteristics to oilfield waste. Imported oilfield waste that is hazardous needs to contain recoverable material.</li> <li>A thermal treatment process that destroys contaminants by oxidation in a controlled environment at temperatures that are effective to reduce contaminants to ashes, inert gases, or vapours.</li> </ul>
impervious liner imported oilfield waste incineration leachate	<ul> <li>Refer to section 4.1 of <i>Directive 055</i>.</li> <li>Waste generated from the exploration and production of oil and gas outside of Alberta that has similar characteristics to oilfield waste. Imported oilfield waste that is hazardous needs to contain recoverable material.</li> <li>A thermal treatment process that destroys contaminants by oxidation in a controlled environment at temperatures that are effective to reduce contaminants to ashes, inert gases, or vapours.</li> <li>As defined in <i>Directive 055</i>.</li> </ul>
impervious liner imported oilfield waste incineration leachate material requiring special handling	<ul> <li>Refer to section 4.1 of <i>Directive 055</i>.</li> <li>Waste generated from the exploration and production of oil and gas outside of Alberta that has similar characteristics to oilfield waste. Imported oilfield waste that is hazardous needs to contain recoverable material.</li> <li>A thermal treatment process that destroys contaminants by oxidation in a controlled environment at temperatures that are effective to reduce contaminants to ashes, inert gases, or vapours.</li> <li>As defined in <i>Directive 055</i>.</li> <li>Material that may pose an extra risk to the environment, public, or worker safety, such as NORMs and PCBs.</li> </ul>
impervious liner imported oilfield waste incineration leachate material requiring special handling non-oilfield waste	<ul> <li>Refer to section 4.1 of <i>Directive 055</i>.</li> <li>Waste generated from the exploration and production of oil and gas outside of Alberta that has similar characteristics to oilfield waste. Imported oilfield waste that is hazardous needs to contain recoverable material.</li> <li>A thermal treatment process that destroys contaminants by oxidation in a controlled environment at temperatures that are effective to reduce contaminants to ashes, inert gases, or vapours.</li> <li>As defined in <i>Directive 055</i>.</li> <li>Material that may pose an extra risk to the environment, public, or worker safety, such as NORMs and PCBs.</li> <li>Waste that has similar characteristics to oilfield waste but was generated by industries in Alberta other than upstream petroleum and geothermal resource development.</li> </ul>

oilfield waste generator	The licensee or approval holder, as defined by the records of the AER, of a well, pipeline, or facility over which the AER has jurisdiction that generates oilfield waste.		
oilfield waste receiver	A person or party that accepts or receives oilfield waste for storage, consolidation, transfer, treatment, disposal, or waste minimization.		
qualified person	A licensee-appointed technical person who has the necessary training, expertise, and technical knowledge of the subject matter to ensure licensee adherence to the requirements of this directive. The person is expected to be a member in good standing of an association regulated by a professions or societies act of Alberta or be certified in Canada, including appropriately trained and experienced members of the Alberta Institute of Agrologists, Association of Science & Engineering Technology Professionals of Alberta, Alberta Society of Professional Biologists, Association of the Chemical Profession of Alberta, Association of Professional Engineers, Geologists and Geophysicists of Alberta, and College of Alberta Professional Foresters.		
residuals	The material left after a treatment process, which can include ash, solids, water, and recovered contaminants.		
same production system	<ul> <li>An interconnected system of infrastructure for</li> <li>upstream petroleum production (e.g., wells, facilities, pipelines, batteries), or</li> <li>geothermal development (e.g., wells, facilities, pipelines, heat distribution systems)</li> <li>that has the same duty holder.</li> </ul>		
sludge	Semisolid material typically consisting of hydrocarbon, water, and inorganic sediments (e.g., sands, silts) where the basic sediment and water exceeds 0.5 per cent.		
small incinerator	Thermal treatment equipment burning no more than 10 tonnes of waste per month. (Referred to as a "small batch feed incinerator" in the 2006 edition of <i>Directive 058</i> .)		
standalone facility	A facility constructed and operated on its own site.		
thermal treatment unit			
fixed	Thermal treatment equipment that has been approved for use at one location only and that cannot be moved without dismantling.		
mobile	Thermal treatment equipment with an AEP approval that does not restrict the equipment to one location and that can be moved to different locations.		

transporter	A person or party who receives or takes control of oilfield waste for the purpose of transportation.
treatment	Any method, technique, or process that is applied to change the physical, chemical, or biological character or composition of a substance.
water for reuse	Water that is classified as an oilfield waste under the <i>OGCR</i> —such as produced water, flow back, and leachate—that is used as an alternative to high-quality nonsaline water in hydraulic fracturing operations.

## Appendix 2 Waste Names, Codes, and Common Waste Classification

This appendix provides common waste classifications for waste with historical data (pre-1996) along with the waste codes for use in the oilfield waste disposition report and AER Alberta Oilfield Waste Form. However, it is the duty holder's responsibility to ensure that the waste is classified correctly. For instance, a waste may commonly be a non-DOW; however, in certain circumstances it may be a DOW based on the waste's specific properties.

Where waste classification is unclear, refer to AEP's Alberta User Guide for Waste Managers for further information.

Common waste management practices, in addition to those in the main body of this directive, are also provided in this appendix.

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Absorbents	[OILABS]	l esting required	<ul><li>Flash point</li><li>Leachate</li></ul>	Reuse via laundering/dry cleaning
Acid solutions (unneutralized)	[ACID]	DOW	<ul> <li>Corrosivity</li> <li>Heavy metals</li> <li>Flash point (if hydrocarbon present)</li> <li>pH</li> </ul>	
Activated carbon	[ACTCRB]	Testing required	<ul><li>Flash point</li><li>Leachate</li></ul>	Reuse/regenerate
Aerosol cans	[EMTCON]	Non-DOW		Recycle (if possible)
Asbestos	[ASBEST]		Toxic airborne fibres	See AEP's Disposal of Asbestos Waste: Acceptable Industry Practices
Barrels, pails	[EMTCON]	Normally a non-DOW (may be a DOW based on characterization)		<ul><li>Reuse/return to supplier</li><li>Recycle (barrel/container reconditioning)</li></ul>
Batteries (wet and dry cells)	[BATT]	Wet cell: DOW Dry cell: Non-DOW (unless contains potassium hydroxide)	<ul> <li>Corrosivity</li> <li>Leachate (heavy metals)</li> </ul>	<ul> <li>Recycle via battery recycler</li> <li>Alkaline batteries as per "Garbage/Domestic Waste"</li> </ul>

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Boiler blowdown water	[BLBDWT]	Normally a non-DOW (may be a DOW based on characterization)	Heavy metals	Reuse     Surface discharge (under specific circumstances)
Catalyst – non-sulphur	[CATNS]	Testing required	<ul> <li>Leachate</li> <li>Pyrophoric characteristics</li> </ul>	Reuse/regenerate
Catalyst – sulphur	[CATSU]	Testing required	<ul> <li>Corrosivity</li> <li>Leachate</li> <li>Pyrophoric characteristics</li> </ul>	<ul> <li>Reuse/regenerate</li> <li>See AEP's Guidelines for Landfill Disposal of Sulphur Waste and Remediation of Sulphur Containing Soil</li> </ul>
Caustic solutions (unneutralized, spent)	[CAUS]	DOW	Corrosivity	
Cement (returns dry)	[CEMENT]	Non-DOW		If the waste is a result of drilling, see     Directive 050
Chemicals – inorganic	[INOCHM]	DOW	<ul> <li>Corrosivity</li> <li>Dangerous when wet</li> <li>Leachate</li> <li>Oxidizer</li> <li>Toxicity</li> </ul>	<ul> <li>Disposal practice will vary with specific chemical (considering compatibility and solubility)</li> <li>Reuse/recycle when possible</li> </ul>
Chemicals – organic	[ORGCHM]	DOW	<ul> <li>Corrosivity</li> <li>Flash point</li> <li>Leachate</li> <li>Oxidizer</li> <li>Toxicity</li> </ul>	<ul> <li>Disposal practice will vary with specific chemical</li> <li>Reuse/recycle when possible</li> </ul>
Construction and demolition material	[CONMAT]	Normally a non-DOW (unless contaminated with a DOW)		Decontaminate and reuse
Contaminated debris and soil – chemical/solvent	[SOILCH]	Testing required	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Contaminated debris and soil – crude oil/condensate	[SOILCO]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	
Contaminated debris and soil – emulsion	[SOILEM]	Testing required		
Contaminated debris and soil – mercury/metals	[SOILHM]	Testing required	<ul><li>Leachate (heavy metals)</li><li>Toxicity</li></ul>	
Contaminated debris and soil – pesticide/herbicide	[SOILPT]	Testing required	<ul><li>Leachate</li><li>Toxicity</li></ul>	On-site treatment with activated carbon
Contaminated debris and soil – produced/salt water	[SOILPW]	Non-DOW		
Contaminated debris and soil – refined fuels/oils	[SOILRO]	Testing required	<ul><li>Flash point</li><li>Leachate</li></ul>	
Contaminated debris and soil – sulphur	[SOILSU]	Non-DOW		See AEP's Guidelines for Landfill Disposal of Sulphur Waste and Remediation of Sulphur Containing Soil
Corrosion inhibitor/ oxygen scavenger solutions	[CORINH]	DOW	Heavy metals	
Crude oil/condensate emulsions (residuals after treatment)	[COEMUL]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	
Crude oil sample bottles	[EMTCON]	Non-DOW		<ul> <li>Reuse</li> <li>Recycle (commercial bottle washing facility or a plastic/glass recycling facility)</li> </ul>
Cutting oil tubes	[EMTCON]	Non-DOW		
Dessicant	[DESICT]	Testing required	<ul><li>Corrosivity</li><li>Flash point</li><li>Leachate</li></ul>	<ul><li>Reuse/regenerate</li><li>Recycle (construction fill) if non-DOW</li></ul>
Dimethyl disulphide solutions	[DMDS]	DOW	<ul><li>Flash point</li><li>Toxicity</li></ul>	<ul><li>Reuse if possible</li><li>Return to supplier</li></ul>

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Drilling waste – hydrocarbon	[DRWSHC]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Flash point</li><li>Leachate</li></ul>	See Directive 050
Drilling waste – advanced gel chemical	[DRWSAC]	Non-DOW		See Directive 050
Drilling waste – gel chemical	[DRWSGC]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Flash point</li><li>Leachate</li></ul>	See Directive 050
Filters – air pollution control	[FILAPC]	Testing required	Leachate	
Filters – gas sweetening (MEA, DEA, MDEA, sulphinol)	[FILSWT]	DOW	<ul> <li>Flash point</li> <li>Leachate</li> <li>Pyrophoric characteristics</li> </ul>	<ul> <li>Recycle (metal recovery)</li> <li>Recovered entrained liquids (DOW): Recycle or inject down an appropriate disposal well</li> </ul>
Filters – glycol	[FILGLY]	DOW	<ul> <li>Flash point</li> <li>Leachate</li> <li>Pyrophoric characteristics</li> </ul>	<ul> <li>Recycle (metal recovery)</li> <li>Recovered entrained liquids (DOW): Recycle or inject down an appropriate disposal well</li> </ul>
Filters – lube oil (waste type 201)	[FILLUB]	Undrained: DOW Drained: Non-DOW	<ul><li>Flash point</li><li>Leachate</li></ul>	<ul> <li>Recycle (metal recovery)</li> <li>Recovered entrained liquids (DOW): Recycle or inject down an appropriate disposal well</li> <li>Internal combustion engine lube oil filters are non-DOW if they are fully drained and have a drainage efficiency (DE) &gt;0.5</li> </ul>
Filters – methanol	[FILMTH]	DOW	<ul><li>Flash point</li><li>Leachate</li></ul>	<ul> <li>Recycle (metal recovery)</li> <li>Recovered entrained liquids (DOW): Recycle or inject down an appropriate disposal well</li> </ul>
Filters – other (raw/fuel gas, NGLs)	[FILOTH]	DOW	<ul> <li>Flash point</li> <li>Pyrophoric characteristics</li> <li>Leachate</li> </ul>	<ul> <li>Recycle (metal recovery)</li> <li>Recovered entrained liquids (DOW): Recycle or inject down an appropriate disposal well</li> </ul>

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Filters – produced/process	[FILPWT]	DOW	Flash point	Recycle (metal recovery)
water			Leachate	Recovered entrained liquids (DOW):
			Pyrophoric	Recycle or inject down an appropriate
			characteristics	
Filters – raw/fresh water	[FILFWT]	Non-DOW		
Filters (media) – water	[FILWTT]	Testing required	Flash point	Reuse/regenerate
treatment			Leachate	Recycle (construction fill) if non-DOW
Filter backwash liquids – gas sweetening	[FLBWSW]	DOW	Leachate	
Filter backwash liquids – water	[FLBWWT]	Non-DOW		Reuse
treatment				Recycle (land irrigation)
				Return to source
Frac fluid – hydrocarbon based	[FRFLDH]	Testing required		Recycle/reuse in hydraulic fracturing operations
Frac fluid – water based	[FRFLDW]	Testing required		Recycle/reuse in hydraulic fracturing operations
Frac fluid – radioactive	[FRFLDR]	Testing required		
Frac sand – non-radioactive	[FRCSND]	Normally a non-DOW (may be	Flash point	Recycle (return to supplier)
		a DOW based on characterization)	Leachate	
Frac sand – radioactive (plus other radioactive diagnostic	[FRSDR]	DOW	<ul> <li>Leachate (radioactive tracer)</li> </ul>	Recycle (return to supplier)
materials)			• Toxicity (heavy metals)	
Garbage/domestic waste	[DOMWST]	Non-DOW		Reduce volumes, reduce, reuse, recycle, or replace
Glycol solutions – contains lead	[GLYCHM]	DOW	Flash point	Recycle
or other heavy metals (waste type 202)			• Toxicity (heavy metals)	
Glycol solutions – no heavy	[GLYC]	Testing required	Flash point	Recycle
metals			Toxicity	
Grease cartridges	[EMTCON]	Non-DOW		

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
High solids produced water	[HSPWTR]	Testing required		<ul> <li>Waste processing if the fines content is too high for disposal</li> <li>Refer to WATER and FRMFNS if fines and fluids are separated either on site or on a site within the same production system</li> </ul>
Hydraulic and transmission oil	[HYDOIL]	Normally a non-DOW (may be a DOW based on characterization)	Heavy metals	Recycle
Hydrovac material – chemical/solvents impacted	[HYDVCH]	Testing required		
Hydrovac material – crude oil/condensate impacted	[HYDVCO]	Testing required		
Hydrovac material – emulsion impacted	[HYDVEM]	Testing required		
Hydrovac material – mercury/heavy metals impacted	[HYDVHM]	Testing required		
Hydrovac material – pesticide/herbicide impacted	[HYDVPT]	Testing required		
Hydrovac material – produced/salt water impacted	[HYDVPW]	Non-DOW		
Hydrovac material – refined fuels/oils impacted	[HYDVRO]	Testing required		
Hydrovac material – sulphur impacted	[HYDVSU]	Testing required		
Hydrotest fluids – methanol	[METHNL]	DOW	Flash point	Reuse
			Toxicity	Recycle
Incinerator ash	[INCASH]	Testing required	Leachate (heavy metals)	• If a non-DOW, recycle (construction fill)
lon exchange resin	[IEXRES]	Non-DOW		
lon exchange resin regenerant liquids	[IEXLIQ]	Normally a non-DOW (may be a DOW based on characterization)	• pH	
Iron sponge	[IRNSPG]	DOW	Leachate	See AEP's Guidelines for Landfill Disposal
			Pyrophoric     characteristics	ot Sulphur Waste and Remediation of Sulphur Containing Soil

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Lead-based products – H <sub>2</sub> S sensing tape	[LDTAPE]	DOW	Heavy metals (Pb)	
Lead-based products – pipe dope/greases	[LDDOPE]	DOW	Heavy metals (Pb)	Recycle (if possible)
Lubricating oil – hydrocarbon and synthetic	[LUBOIL]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Heavy metals</li><li>Flash point</li></ul>	Direct to a licensed lube oil recycling facility
Metal – scrap	[SMETAL]	Normally a non-DOW (may be a DOW based on characterization or if cross- contaminated with a DOW)		Decontaminate (if a DOW) and recycle via     a scrap metal dealer
Mud sacks – drilling	[EMTCON]	Non-DOW		Reuse (return to mud supplier)
Naturally occurring radioactive materials	[NORM]	DOW	Toxicity	See Canadian Guidelines for the Management of Naturally Occurring Radioactive Materials (NORM)
Paints	[WPAINT]	DOW	Flash point	Recycle
			Heavy metals     Toxicity	Approved toxic roundup (if small volumes)
Paint cans/brushes	[EMTCON]	Non-DOW if empty and dry	Toxicity	
Pesticides/herbicides	[PSTHRB]	DOW	Toxicity	Reduce
				Reuse
				Recycle
Pesticide/herbicide – containers	[PSTCON]	DOW	Toxicity	Recycle (pesticide container collection site)
Pigging waste – liquid and wax	[PIGWST]	Testing required	Flash point	
			Pyrophoric     characteristics	
Pipe dope containers/brushes	[EMTCON]	Non-DOW if empty and dry	Heavy metals	Reuse
Polychlorinated biphenyls – askarel liquids	[PCBLIQ]	DOW	Toxicity	Direct to an approved hazardous waste disposal facility
Polychlorinated biphenyls – contaminated solids <50 ppm	[PCBSLF]	Non-DOW		

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Polychlorinated biphenyls – contaminated solids ≥50 ppm and <1000 ppm	[PCBSLI]	DOW	Toxicity	Direct to an approved hazardous waste disposal facility
Polychlorinated biphenyls – contaminated solids ≥1000 ppm	[PCBSGI]	DOW	Toxicity	Direct to an approved hazardous waste disposal facility
Polychlorinated biphenyls – fluorescent light ballasts	[PCBBAL]	DOW	Toxicity	<ul> <li>Direct to an approved hazardous waste disposal facility</li> <li>Recycle metal component if possible</li> </ul>
Rags	[OILRAG]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	<ul> <li>Reuse via laundering/ dry cleaning</li> </ul>
Residual formation fines after treatment and settlement	[FRMFNS]	Testing required		
Salt heat medium	[SALT]	Normally a non-DOW (may be a DOW based on characterization)	Oxidizes	
Sand – produced	[SAND]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	Recycle (other industrial uses)
Sludge – cooling tower	[SLGCTW]	DOW	Leachate (heavy metals)	
Sludge – emulsion	[SLGEML]	Testing required		
Sludge – flare pit	[SLGPIT]	Testing required	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	
Sludge – gas sweetening systems	[SLGSWT]	DOW	<ul><li>Flash point</li><li>Leachate</li></ul>	
Sludge – glycol/gas drying	[SLGGLY]	DOW	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	
Sludge – hydrocarbon	[SLGHYD]	Testing required	<ul><li>Flash point</li><li>Leachate</li></ul>	
Sludge – lime	[SLGLIM]	Testing required	Corrosivity	

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Sludge – process	[SLGPRO]	Testing required	Leachate	
Sludge – sulphur	[SLGSUL]	Testing required	Corrosivity     Leachate	See AEP's Guidelines for Landfill Disposal of Sulphur Waste and Remediation of Sulphur Containing Soil
Solvents/residues – halogenated	[SOLHAL]	DOW	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	Recycle (regenerate, alternative uses)
Solvent/residues – non-halogenated aliphatic	[SOLALP]	DOW	<ul><li>Flash point</li><li>Leachate</li><li>Toxicity</li></ul>	Recycle (regenerate, alternative uses)
Solvents/residues – non-halogenated aromatic	[SOLARO]	DOW	<ul> <li>Flash point</li> <li>Leachate</li> <li>Toxicity</li> </ul>	Recycle (regenerate, alternative uses)
Sweetening agents – liquids	[SWTLIQ]	Normally a non-DOW (may be a DOW based on waste characterization)	<ul><li>Flash point</li><li>Leachate</li></ul>	
Sweetening agents – solids	[SWTSOL]	Normally a non-DOW (may be a DOW based on characterization)	Leachate	
Thread protectors – casing/ tubing	[THPROT]	Non-DOW		<ul><li>Reuse (return to pipe supplier)</li><li>Recycle</li></ul>
Treater hay	[TRTHAY]	Normally a DOW (may be a non-DOW based on characterization)	<ul> <li>Flash point</li> <li>Pyrophoric characteristics</li> </ul>	
Wash fluids – organic	[WSHORG]	Testing required	<ul> <li>Flash point</li> <li>Halogenated organics content</li> <li>Toxicity</li> </ul>	<ul> <li>Recycle (regenerate, alternative uses)</li> <li>Recover hydrocarbons and inject via disposal well</li> </ul>
Wash fluids – water	[WSHWTR]	Normally a non-DOW (may be a DOW based on characterization)	<ul> <li>Flash point</li> <li>Halogenated organics content</li> <li>pH</li> </ul>	Recover hydrocarbons and inject via disposal well

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Water – contaminated (leachate, collected surface water)	[CWATER]	Testing required		
Water – process (with organic chemicals)	[PWTROR]	Testing required	<ul> <li>Flash point</li> <li>Halogenated organics content</li> <li>Toxicity</li> </ul>	
Water – process (with heavy metals)	[PWTRHM]	DOW	<ul><li>Heavy metals</li><li>pH</li></ul>	
Water – produced (including brine solutions)	[WATER]	Non-DOW		<ul> <li>Recycle (waterflood, hydraulic fracturing)</li> <li>Recover hydrocarbons before injection down a disposal well</li> <li>Recover any hydrocarbons prior to reuse or recycle in hydraulic fracturing</li> </ul>
Waste – compressed or liquefied gases	[WSTCGS]	Testing required	Depends on specific     waste	
Waste – corrosive (liquid)	[WSTCLQ]	Testing required	Corrosivity     Toxicity	
Waste – corrosive (solid)	[WSTCSO]	Testing required	Corrosivity	
Waste – flammable (liquid)	[WSTFLQ]	Testing required	Flammability	
Waste – flammable (solid)	[WSTFSD]	Testing required	Flammability	
Waste – miscellaneous	[WSTMIS]	Testing required		
Waste – oxidizing (liquid)	[WSTOLQ]	Testing required	Oxidizes	
Waste – oxidizing (solid)	[WSTOSD]	Testing required	Oxidizes	
Waste – poisonous (liquid)	[WSTPLQ]	Testing required	Toxicity	
Waste – poisonous (solid)	[WSTPSD]	Testing required	Toxicity	
Waste – radioactive material	[WSTRDM]	Testing required	Toxicity	
Well workover fluids	[WWOFLD]	Testing required	<ul><li>Corrosivity</li><li>Flash point</li></ul>	Recover hydrocarbons before injection     down a disposal well

Waste name	Waste code	Common waste classification	Common properties for waste characterization	Waste management options
Wood – chemically treated/ cooling tower	[WOODCT]	Normally a non-DOW (may be a DOW based on characterization)	<ul><li>Heavy metals</li><li>Leachate</li></ul>	
## Appendix 3 Treatment and Disposal Method Descriptors for the Oilfield Waste Disposition Report

This appendix provides the descriptors for the disposal and treatments methods that are needed to complete the oilfield waste disposition report.

- Biodegradation through one-time on-site biocell or biopile
- Biodegradation at an oilfield waste management facility
- Burial (on site)
- Cavern disposal
- Disposal wells
  - Class Ia disposal well
  - Class Ib disposal well
  - Class II disposal well
- Landfills
  - Class I landfill
  - Class II landfill
  - Class III landfill
- Manufacturer (covers manufacturing, processing, or distributing a commercial product)
- Recycling facility (excluding used oil recycler)
- Road spread (spreading oily by-product on roads)
- Small oilfield waste incinerator (small batch feed and campsite incinerators)
- Swan Hills Treatment Centre
- Thermal treatment (fixed and mobile incinerators)
- Transport by pipeline
- Used oil recycler
- Waste processing at an oilfield waste management facility
- Other (oilfield waste treated or disposed of using method not listed above)

# Appendix 4 Examples of Minimizing Waste

The most effective waste management practice is to avoid producing the waste in the first place. When that is not possible, the AER expects companies to minimize waste. Below are examples of how to do so through reducing, reusing, recovering, and recycling.

#### Reduce

Companies have the greatest opportunity to minimize waste by reducing the waste at its source.

## Ways to Reduce

- Purchase chemicals in bulk to reduce container waste and possible spills when handling.
- Segregate process streams to minimize sludge or liquid production.
- Dry sludge prior to treatment and disposal, thereby reducing the waste volume.
- Install more efficient processing equipment or improving the operating efficiency of existing equipment.
- Analyze compressor and engine lubricating oils to determine if an oil change is actually required.
- Reduce the use of filters in water injection streams.
- Discontinue the use of treater hay from treater vessels.
- Use less hazardous substitutes for toxic products.

## Reuse

Companies should make every effort to reuse waste.

## Ways to Reuse

- Reuse cleaned oil rags.
- Use reusable filters.
- Reuse filtered lube oil for chemical injection pumps.
- Filter gear lubricating oil to extend period of use.
- Reuse water-based hydraulic fracturing flow back and produced water as an alternative water in hydraulic fracturing.

#### Recycle

Companies may have limited opportunities to recycle waste and will often require the use of a third-party waste contractor. Waste to be recycled should be segregated from other waste to prevent cross-contamination.

## Ways to Recycle

- Use waste acids to neutralize caustic wastes.
- Recycle lube oil, glycol, solvents, unspent chemicals, batteries, paper, metal, plastic containers, and glass.

#### Recover

Companies may have limited opportunities to recover substances contained in the waste and will often require the use of a third-party waste contractor.

#### Ways to Recover

- Separate and recover hydrocarbons in wash waters.
- Recover oil from oily sludges.