

Note: The reference to ID 2000-4 in the last paragraph of this document should read ID 2000-3

# Interim Directive

## ID 2000-4

June 19, 2000

TO: All Oil and Gas Operators  
All Oil Sands Operators  
All Drilling and Servicing Operations  
All Pipeline Operators  
All Oilfield Waste Management Operators

### **AN UPDATE TO THE REQUIREMENTS FOR THE APPROPRIATE MANAGEMENT OF OILFIELD WASTES**

The purpose of this interim directive is to communicate requirements specific to the management of oilfield wastes. Some of the requirements outlined here are a clarification or modification of the requirements detailed in EUB *Guide 58: Oilfield Waste Management Requirements for the Upstream Petroleum Industry*, while others are new. The Alberta Energy and Utilities Board (EUB) believes that these requirements complement EUB *Interim Directive (ID) 2000-3: Harmonization of Waste Management* and its attached memorandum of understanding (MOU) between the EUB and Alberta Environment (AENV).

To enhance protection of the environment and public safety and to reduce liability through appropriate waste management, the EUB requires oilfield waste generators to comply with all pertinent EUB requirements as referenced in Appendix 1, as well as the following additional requirements:

- It is prohibited, with the exception of construction and demolition debris, garbage and domestic wastes, and scrap metal, to deposit oilfield wastes into any registered landfill or any landfill currently operating under an Alberta Public Health Permit that will qualify for registration under the *Code of Practice for Landfills* pursuant to the Environmental Protection and Enhancement Act (EPEA).
- Oilfield wastes, with the exception of suitable cellulose materials (e.g., trees, and other vegetative material resulting from lease construction, decontamination, or decommissioning), must not be sent to compost facilities or managed by compost components at waste management facilities, including AENV-regulated landfills.

- Oilfield wastes must not be sent to dedicated land treatment facilities, with the exception of petroleum hydrocarbon-contaminated soils that are suitable for biodegradation, as outlined in Section 16.2 of EUB *Guide 58*.
- Dangerous oilfield wastes being sent off site for collection, treatment, disposal, or recycling must only be sent to facilities approved for the management of hazardous wastes, hazardous recyclables, or dangerous oilfield wastes.
- Provided the above requirements are not contravened, oilfield wastes may be sent to AENV regulated facilities. The oilfield wastes must be
  - similar in characteristics and source to other wastes authorized by AENV,
  - within all waste acceptance limitations specified by AENV, and
  - only managed by activities that AENV has authorized for the facility.
- For liability management and to complement Alberta's Expanded Orphan Program, only wastes generated within the same production system may be managed as one-time treatment or by an on-site waste management component.
- Mobile treatment technologies (e.g., incinerators) may be used to manage oilfield wastes on EUB- approved or licensed sites provided that the technology is approved or registered, as required, under EPEA and the notification requirements in Section 17.5 of EUB *Guide 58* are followed.

Refer to Appendix 2 for a list of definitions pertaining to waste management.

Currently, Section 6.0, Alternative Disposal Options, of EUB *Guide 50: Drilling Waste Management*, identifies that when drilling waste is disposed at an approved waste management facility, the generator must meet information requirements specific to the waste management facility.

To ensure a consistent level of tracking for drilling wastes disposed in this manner, effective July 1, 2000, the following additional requirements will be applied:

- All drilling wastes sent to waste management facilities (EUB or AENV regulated) shall be considered trackable oilfield wastes under EUB *Guide 58*.
- The waste codes for drilling sumps (gel chem, hydrocarbon, and KCL) in Table 7.4, Waste Management Table, of EUB *Guide 58* shall be used to track the drilling wastes.

The EUB acknowledges that the publication of this interim directive, *ID 2000-4*, as well as other publications listed in Appendix 1 will necessitate the review and update of EUB *Guide 58*. The EUB will undertake the timely completion of this review.

*<Original signed by>*

Brian Bietz  
Board Member  
Alberta Energy and Utilities Board

Attachments

## **Appendix 1 EUB Legislation**

The EUB regulates the management of oilfield wastes under the authority of the *Oil and Gas Conservation Act* and the *Oil and Gas Conservation Regulation*. The details regarding the management of oilfield wastes at the generator's facility site, the transportation of oilfield wastes on Alberta's public roads, and the treatment and disposal of oilfield wastes at waste management facilities are outlined in the following EUB documents:

- *ID 96-3 and Guide 58: Oilfield Waste Management Requirements for the Upstream Petroleum Industry*
- *IL 96-13 and Guide 50: Drilling Waste Management*
- *IL 94-2 and Guide 51: Injection and Disposal Wells, Well Classifications, Logging, and Testing Requirements*
- *ID 95-3 and Guide 55: Storage Requirements for the Upstream Petroleum Industry*
- *ID 99-4: Deposition of Oilfield Waste into Landfills*
- *IL 99-2: Use of Produced Sand in Road Construction*
- *IL 98-2: Suspension, Abandonment, Decontamination, and Surface Land Reclamation of Upstream Oil and Gas Facilities*
- *IL 98-1: Coordination of Release Notification Requirements and Subsequent Regulatory Response*
- *IL 99-4: EUB Enforcement Process, Generic Enforcement Ladder, and Field Surveillance Enforcement Ladder (with Clarification dated February 24, 2000)*
- *Guide 36: Drilling Rig Inspection Manual*
- *Guide 37: Service Rig Inspection Manual*
- *Guide 63: Oilfield Waste Management Facility Inspection Manual (in draft)*
- *Guide 64: Facility Inspection Manual*

## Appendix 2 Definitions

Approved Landfill (AENV)	An AENV-regulated landfill that accepts more than 10 000 tonnes of wastes per year, that accepts hazardous wastes, or that is located in a ravine, gully or coulee, or over a buried valley and is approved under the Environmental Protection and Enhancement Act.
Biodegradation Facility (EUB)	A type of oilfield waste management facility where oilfield wastes are biologically degraded in a contained and controlled environment, whether it is in an impermeable cell structure (biocell) or piled on a impermeable liner (biopile). (Does not include land treatment.)
Compost (AENV)	The stable humus-like material that results from the biological decomposition and stabilization of organic materials under aerobic and thermophilic conditions. It is potentially beneficial to plant growth and is sanitized to a degree that protects human health.
Compost Facility (AENV)	A waste management facility where waste, not including hazardous waste, is decomposed through a controlled bio-oxidation process that results in a stable humus-like material but does not include a residential composter or a compost facility that receives only sludge as defined in the Wastewater and Storm Drainage Regulation.
Facility (EUB)	Any building, structure, installation, equipment, or appurtenance over which the Board has jurisdiction and that is connected to or associated with the recovery, development, production, handling, processing, treatment, or disposal of hydrocarbon-based resources or any associated substances or wastes, and includes, without limitation, a battery, a processing plant, a gas plant, an oilfield waste management facility, a central processing facility as defined in the Oil Sands Conservation Regulation (AR 76/88), a compressor, a dehydrator, a separator, a treater, a custom treating plant, a produced water-injection plant, a produced water disposal plant, a miscible flood injection plant, a satellite, or any combination of them, but does not include a well, a pipeline as defined in the Pipeline Act, a mine site or processing plant as defined in the Oil Sands Conservation Regulation (AR 76/88), or a mine site or coal processing plant as defined in the Coal Conservation Act.
Land Treatment (AENV)	The controlled application of a substance on the soil surface and incorporation of the substance into the upper soil zone in such a manner that physical, chemical, or biological degradation of the substance takes place. (Dedicated facilities allowed.)
Land Treatment	A planned and controlled mixing of oilfield wastes and soil surface in

(EUB)	which the inherent soil processes are used to biodegrade, transform, and assimilate the waste constituents. (Limited to one-time, on-site application of non-refined hydrocarbon contaminated soil or pit/pond sludge.)
Off-site (AENV)	An independent site established to manage third-party wastes.
Oilfield Waste	An unwanted substance or mixture of substances that results from the construction, operation, abandonment, or reclamation of a facility, well site, or pipeline but does not include an unwanted substance or mixture of substances from such a source that is received for storage, treatment, disposal, and/or recycling at a facility regulated by Alberta Environment.
On-site (AENV)	Management of a generator's hazardous wastes at a site owned by the generator of the wastes.
On-site (EUB)	The management of oilfield waste on the site on which it was generated or on another site within the same production system, provided that both sites have the same licensee or approval holder.
Personal Identification Numbers	A registration number from AENV required by anyone who consigns, transports, or receives hazardous wastes or recyclables.
Registered Landfill (AENV)	An AENV-regulated class II or class III landfill not located in a ravine, gully or coulee, or over a buried valley, where not more than 10 000 tonnes per year of non-hazardous and inert waste is disposed and its construction, operation, reclamation, and registration are in compliance with the requirements specified in the <i>Code of Practice for Landfills</i> .
Same Production System (EUB)	An interconnected system of upstream production facilities (e.g., wells, pipelines, batteries). An oil/gas production site receiving oilfield wastes for on-site management or storage must be within the same interconnected system of upstream production facilities as the oil/gas production site from which the oilfield wastes originated. Both the receiving and the originating site must have the same licensee or approval holder.