



INFORMATIONAL LETTER IL 84-11

29 October 1984

To: All Oil, Gas, Oil Sands, and Gas Plant Operators

APPROVAL, MONITORING, AND CONTROL OF SULPHUR STORAGE SITES

Alberta Environment (AE), Alberta Energy and Natural Resources (ENR), and the Energy Resources Conservation Board (ERCB) have reviewed the existing approval system and inspection procedures for sulphur handling facilities. This Informational Letter summarizes the responsibilities of each agency and the current guidelines for installing and operating sulphur handling facilities.

I New Facilities

Applications for new or modified primary sulphur handling facilities¹ associated with sour gas plants are to be sent to the Gas Department of the ERCB. Applications for new or modified primary sulphur handling facilities associated with primary crude bitumen upgrading plants are to be sent to the Oil Sands Department of the ERCB. Primary sulphur handling facilities have been and will continue to be approved as part of an application for a gas processing scheme pursuant to the Oil and Gas Conservation Regulations or an oil sands processing plant pursuant to the Oil Sands Conservation Act. It is intended that distinct approvals or licences would not be issued for these facilities.

¹ *This and other terms are defined in [Section V](#).*

Approvals and regulation of secondary sulphur handling facilities are the sole responsibility of AE. Applications for new or modified secondary sulphur handling facilities are to be sent to the Standards and Approvals Division of AE.

It is expected that operators will select sites for primary and secondary sulphur handling facilities and design and operate such facilities in a manner that minimizes environmental impact on the surrounding area. Particular emphasis is to be placed on minimizing sulphur dust emissions, minimizing the release of entrained gases, and preventing releases of contaminated waters to surface or ground-water systems.

II Modification of Existing Facilities or Operations

Primary sulphur handling facility operators who are contemplating major changes in mode of

operation are to notify either the Oil Sands or Gas Department of the ERCB (whichever is appropriate) in advance, outlining the changes in operations and addressing action that will be taken to minimize the potential for environmental impacts. The ERCB will then refer this notice to the appropriate divisions within AE or ENR. A major change in mode of operation would include, but is not limited to:

- (i) commencement of sulphur block recovery by any method,
- (ii) development of a new block or stockpile,
- (iii) installing new or additional prilling, slating, or forming facilities,
- (iv) recovery of contaminated sulphur or sulphur base pad, and
- (v) final clean-up of sulphur product.

Notification of changes to mode of operations at a secondary sulphur handling facility are to be made to the Standards and Approvals Division of AE.

III Facility Operation Responsibility

The operator of a primary sulphur production facility will be deemed responsible for clean-up, reclamation, and rehabilitation of the primary sulphur handling facilities site and any off-site rehabilitation effort required as a result of the operation of the primary sulphur handling facilities, regardless of ownership of the sulphur being handled or stored. The operator of a primary sulphur handling facility shall be the company recognized by the ERCB in its respective approvals, and in the case of public lands, includes the lessee as defined in the Public Lands Act.

IV Monitoring and Corrective Action

The ERCB is the primary contact for operations, inspection, and corrective action at the site of primary sulphur handling facilities. Where off-site monitoring by the operator, AE, or ENR indicates undesirable environmental impacts are occurring, the ERCB will be the contact agency respecting initiation and inter-agency co-ordination of corrective action.

AE is the primary contact and co-ordinating agency for operations, inspection, and corrective action at the site of secondary sulphur handling facilities.

Specific off-site air, water, and soil monitoring requirements are a direct responsibility of AE. In addition, the following on-site matters should be dealt with directly between operators of primary sulphur handling facilities and AE:

- (i) all systems that discharge liquid waste off-site to surface,
- (ii) ground-water systems, and
- (iii) site decontamination and reclamation.

ENR manages the publicly-owned resources of timber, public land, fish, and wildlife in Alberta. In

addition to approving surface uses of public lands, ENR will become involved through the respective lead agency for sulphur handling facilities in any matters that have or may impact these resources, including problem identification.

V Definitions

For the purpose of this Informational Letter:

- a. sulphur production facility means any facility producing sulphur at a sour gas plant or a crude bitumen upgrading plant,
- b. primary sulphur handling facility means any location, structure, or equipment which is associated directly with and proximal to a sulphur production facility and which handles, stores, forms, remelts, or loads sulphur, and
- c. secondary sulphur handling facility means any location, structure, or equipment which receives sulphur from a sulphur production facility or from a primary sulphur handling facility for the purposes of handling, storing, forming, remelting, or loading sulphur and is located a significant distance from the facility from which it receives its sulphur or operates by virtue of an approval independent of the sulphur production facility.

signed by

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