

HIGHWAY MAINTENANCE BULLETIN 19/2017

Risk Management Plan Requirements

Summary

This bulletin is issued to provide information pertaining to Risk Management Plan (RMP) requirements at Alberta Transportation's (AT's) Highway Maintenance Yards (HMYs). Alberta Environment and Parks (AEP) requires the remediation, or development of RMPs, under the Alberta Environmental Protection and Enhancement Act (EPEA) whenever Alberta Tier 1 / Tier 2 criteria, as defined by the Act, have been exceeded at HMYs. The Environmental Management Plan (EMP) Guidelines dated April, 2011 (and subsequent versions) have been developed to ensure that the Highway Maintenance Contractor (HMC) is aware of, and complies with, all applicable environmental legislation, including RMP requirements.

Other applicable Federal and Provincial legislation that must be adhered to by HMCs includes, but is not limited to, the following:

- Environmental Protection and Enhancement Act (EPEA) – Provincial
- Canadian Environmental Protection Act (CEPA) – Federal
- Waste Control Regulation – Provincial
- Release Reporting Regulation – Provincial
- Water Act – Provincial
- Storm Water and Drainage Regulation – Provincial

Recent AT EMP inspections, off-site contamination monitoring at Legacy HMYs (GoA currently or previously owned), and adjacent landowner complaints revealed that current practices are not meeting the EMP Guidelines, nor RMP requirements at select sites.

Key Changes

Given the ongoing concerns of non-compliance with Federal and Provincial legislation the following is a reminder of the existing roles and responsibilities with respect to the EMP Guidelines:

HMC's Roles and Responsibilities

EMP Guidelines states:

- HMCs must inspect HMYs to ensure compliance with the EMP and relevant environmental legislation and guidelines.
- HMCs will remediate or manage contaminant releases and restore the environment to a satisfactory condition.

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- HMCs will monitor and adjust their performance to meet the requirements of the EMP.

In addition:

- Under EPEA, HMCs are required to report releases and to take remedial measures where a substance (e.g. salt) that may cause, is causing, or has caused, an adverse effect to the environment.
- Where HMYs have releases that exceed Tier 1/Tier 2 criteria, AEP requires the remediation or development of a RMP.
- HMCs are responsible for the source control measures at HMYs to meet RMP requirements at each HMY site.
- Source control includes the review of current operational practices and implementation of mitigation/remediation to address salt (chloride) impacts.
- HMCs must immediately address all outstanding issues arising from annual EMP inspection results and provide Corrective Action Plans within two weeks to the Operations Managers (OMs).
- HMCs can obtain assistance from their Environmental Consultants regarding cost effective source control measures and corrective actions.

AT's Roles and Responsibilities

- District operational staff will:
 - Review AT's annual EMP inspection reports and provide these to the HMCs within two weeks of receipt of the reports.
 - Approve the HMCs' Corrective Action Plan within two weeks of receiving the plan so that the HMCs can proceed with corrective actions in a timely manner.
 - Track the schedule for corrective actions provided by HMCs to ensure RMP requirements are being met.
 - Provide technical guidelines and clarification to the HMCs regarding their EMP/RMP obligations.
- AT's Environmental Services can provide detailed information on site specific issues to OMs for Legacy HMYs (as required).
- AT is committed to prepare RMPs for Legacy Sites.
- Environmental Services (ES) will conduct annual EMP inspection on Legacy HMYs.

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Implementation

HMCs and Department staff are to review roles and responsibilities and take applicable action to ensure practices are meeting the EMP Guidelines and RMP requirements.

Effective Date

October 16, 2017

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Approved



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