ATTACHMENT 8

Waste Management Plan

Waste Management Plan for Construction Projects

Effective January 2011

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Environmental Construction Permitting
1100-915 N. Eldrige Parkway
Houston, TX 77079

ABBREVIATIONS AND DEFINITIONS

Company – Any Enbridge, Inc. personnel that may include, but is not limited to, Houston Environmental, Regional Environmental, Environmental Construction Permitting, Transmission Field Staff, Transmission Technical Staff, Engineering & Construction personnel

Contractor – Any personnel hired by Enbridge, Inc. to perform the project work

Hazardous Waste – Any liquid, solid, contained gas, sludge substance, mixture of substances, or other waste that poses a dangerous or potentially harmful risk to human health or the environment due to its physical or chemical properties. This includes waste with properties such as ignitability, corrosivity, reactivity and/or toxicity, waste that is or contains substances listed in hazardous waste regulations, and waste derived from certain industrial processes, as defined in hazardous waste regulations. In certain states, waste with 50 ppm or greater PCBs is considered hazardous waste.

Non-hazardous Waste – Any liquid, solid, contained gas, sludge substance, mixture of substance, or other waste that does not pose a dangerous or potentially harmful risk to human health or the environment due to its physical or chemical properties. This includes domestic solid wastes such as office trash, paper, and food packaging, as well as industrial waste such as construction debris, oily waste, empty product drums, concrete, non-hazardous spent blasting media, used oil filters, uncontaminated concrete or soil, rock, asphalt, plastic, used straw bales, used silt fence and similar waste.

PCB Waste – Any liquid, solid, contained gas, or sludge substance waste that contains polychlorinated biphenyls (PCBs).

Plan – Waste Management Plan

Recyclable Material – Any uncontaminated material which can be re-used intact, processed, refined, or reclaimed. Examples are excavated fill, rock, wood chips, used oil, used glycol, scrap metal, tires, paper, glass, filters, and similar waste.

Solid Waste - The term "solid waste," used in Subtitle D, refers almost exclusively to non-hazardous solid waste. Subtitle D covers all wastes not regulated by Subtitle C, which regulates hazardous waste. Subtitle D covers certain hazardous wastes which are excluded from Subtitle C, including household hazardous waste and hazardous wastes generated by small quantity generators. Section 100(27) of the Resource Conservation and Recovery Act (RCRA) defines solid waste as:

> Garbage (e.g., milk cartons and coffee grounds), refuse (e.g., metal scrap, wall board, and empty containers), sludge from a waste treatment plant, a water supply treatment plant, or an air pollution control facility (e.g., scrubber sludge). Other discarded material, including solid, semi-solid, liquid, or contained gaseous material resulting from industrial, commercial, mining, agricultural, and community activities (e.g., boiler slag or fly ash).

A good definition of municipal solid waste is that it includes durable goods, non-durable goods, containers and packaging, food wastes and yard trimmings, and miscellaneous inorganic wastes.

Subtitle D Landfill – Subtitle D landfills are typically municipal solid waste landfills (MSWLFs) and receive household waste. MSWLFs can also receive non-hazardous sludge, industrial solid waste, and construction and demolition debris. All MSWLFs must comply with the federal regulations in 40 CFR Part 258 (Subtitle D of RCRA) or equivalent state regulations. Federal MSWLF standards include:

- **Location restrictions**—ensure that landfills are built in suitable geological areas away from faults, wetlands, flood plains, or other restricted areas.
- **Composite liners requirements**—include a flexible membrane (geomembrane) overlaying two feet of compacted clay soil lining the bottom and sides of the landfill, protect groundwater and the underlying soil from leachate releases.
- **Leachate collection and removal systems**—sit on top of the composite liner and removes leachate from the landfill for treatment and disposal.

- **Operating practices**—include compacting and covering waste frequently with several inches of soil to help reduce odor; control litter, insects, and rodents; and protect public health.
- **Groundwater monitoring requirements**—requires testing groundwater wells to determine whether waste materials have escaped from the landfill.
- **Closure and postclosure care requirements**—include covering landfills and providing long-term care of closed landfills.
- **Corrective action provisions**—control and clean up landfill releases and achieves groundwater protection standards.
- **Financial assurance**—provides funding for environmental protection during and after landfill closure (i.e., closure and postclosure care).

Waste Material Storage Containers – Anything that adequately and safely contains waste per Enbridge, Inc. guidelines and federal, state, and local guidelines; examples are, but not limited to, roll-off containers and frac tanks.

Waste Material – any excess liquid or solid material that will not be reused and needs to be discarded or has been identified for disposal.

PURPOSE/PLAN OBJECTIVE

Enbridge, Inc. ("the Company") has prepared this Waste Management Plan ("the Plan") for construction projects in the United States. The purpose of this plan is to ensure the proper management and documentation of all waste generated during construction projects.

Waste disposal planning and waste minimization are important elements of any successful project. The Company should work closely with the selected Contractor to verify that all construction waste material is properly estimated prior to starting any construction project and that recycling or disposal options are identified in advance of starting the project.

All Company and Contractor personnel will be trained on the awareness level for this Plan. The Plan does not cover health and safety concerns associated with handling, storage, transportation, and disposing of non-hazardous or hazardous materials.

This Plan outlines both Contractor and Company responsibility for management of non-hazardous and hazardous waste. If the waste type is unknown, the Company will work with the Contractor to determine the waste type through sampling, historical data, or other documented resources.

In the absence of a Contractor, Company personnel are responsible for managing and disposing of the waste generated as a result of construction activities.

Note: Whenever possible, the Company prefers to reuse or recycle, sell or donate all waste construction materials. Construction and demolition waste can include untreated wood, wood chips, metal, glass, rubber, uncontaminated concrete, uncontaminated soil, rock, stone, asphalt, plastics, sheetrock, and drilling mud or bentonite clay/fluid. To do so, the proper Company approvals must be obtained to ensure the receiving facility, location and/or site meets the appropriate federal and state regulations.

NON-HAZARDOUS WASTE

Contractor Responsibility

The Contractor will be responsible for handling, managing, and disposing of all non-hazardous waste associated with the project. The Contractor will perform the following tasks:

- Maintain good housekeeping on the site;
- Ensure that all drums, product containers, roll-off boxes and frac tanks are properly labeled in accordance with federal, state, and local requirements. At a minimum all drums, product containers, roll-off boxes and frac tanks must be labeled with the name of the contents, including trash and construction waste/debris. Empty containers shall be labeled as "empty". All drums used for waste storage, other than those used for domestic trash, shall be labeled with start accumulation date.
- Properly store waste material on-site according to federal, state, and local regulations and Company policies while awaiting disposal;
- Identify all disposal locations to be used for construction waste disposal, recycling, and/or reuse (donation/selling)
- Profile all waste material for disposal acceptance at the appropriate Company approved landfill (non-hazardous waste must be disposed of in a Subtitle D landfill), or, if the material is uncontaminated and recyclable, obtain the proper Company approval to recycle, sell or donate the material;
- Transport and coordinate disposal of waste material at the appropriate landfill, recycling, or treatment facility;
- Keep all waste streams separate from generation through handling, storage, and transport;
- Arrange clean-up of waste material storage containers;
- Bring in clean fill from appropriate origin as necessary; and
- Maintain records of all waste disposals associated with the construction project and provide these records to the Company.

Company Responsibility

The Company will be responsible for oversight of the Contractor and its waste management as it relates to the adherence of Company policies. The Company will perform the following tasks:

- Sample and analyze the waste material, as necessary, for disposal profiling at the appropriate landfill or recycling facility;
- Classify the waste material per the sampling results or other means such as process knowledge;

- Complete the applicable evaluation report if the material is to be recycled or reused, sold or donated;
- Provide the proper training to Company personnel for handling non-hazardous waste material;
- Ensure all records of waste transportation and disposal are obtained from the Contractor; and
- Enter all waste transportation and disposal information into EPASS.

Monitor storage of wastes to ensure wastes are stored in compliance with company policies.

HAZARDOUS WASTE

Contractor Responsibility

The Contractor will be responsible for properly storing all hazardous waste associated with the project. The Contractor will perform the following tasks:

- Properly label and store waste material on-site according to federal, state, and local regulations while awaiting characterization and disposal;
- Keep all waste streams separate from generation through handling, storage, and transport;
- Provide documented clean fill from appropriate origin as necessary; and
- Decontaminate equipment that has come into contact with hazardous or PCB waste as per the Company policies.

Company Responsibility

The Company will be responsible for classification, handling, managing, and disposing of all hazardous waste associated with the project as stated in Company policies. The Company will perform the following tasks:

- Sample and analyze the waste material, as necessary, for disposal profiling at the appropriate treatment, storage and disposal (TSD) facility licensed to accept hazardous waste;
- Classify the waste material per the sampling results or process knowledge;
- Profile all waste material for disposal acceptance at the appropriate Company-approved TSD facility;
- Coordinate and schedule transportation and disposal of hazardous waste material at the appropriate facility;
- Provide the proper training to Company personnel for handling hazardous waste material; and
- Enter all waste transportation and disposal information into EPASS.
- Monitor storage of wastes to ensure wastes are stored in compliance with company policies.

UNEXPECTED CONTAMINATION ENCOUNTER

Prior to construction the Company will identify potential sources of unexpected contamination within the project area based on the surrounding area and/or past history.

If unexpected contamination is encountered during the project:

Contractor Responsibility

- Stop work and leave the potentially contaminated area, moving up wind;
- Notify the Chief Inspector immediately; and
- Re-enter the area ONLY after the Company has provided verbal approval.

Note: Do not unnecessarily handle any contaminated materials. Equipment that may have come in contact with the contamination should not be removed from the area.

Note: Follow appropriate best management practices, any health and safety plan and procedures, and company policies if unexpected contamination is encountered.

Company Responsibility

- Assure that the work area is marked or roped off to prevent unauthorized entry;
- Assess the situation and determine the source of the contamination, if possible;
- Gather as much available information about the contamination without unnecessary handling or exposure to the contaminated material;
- Make necessary internal and external notifications;
- Determine sampling requirements;
- Arrange for response and sampling from a licensed waste company;
- Determine onsite monitoring requirements; and
- Coordinate disposal of contaminated material, if necessary, based on analytical results.

Note: Until hazards are determined, ONLY site personnel who have current hazardous waste operations (HAZWOPER) training may enter the contaminated area to control or clean up the area.

Note: DO NOT backfill any encountered contamination. Once contamination has been encountered, it is our environmental responsibility to properly respond and manage the situation.

- Manage wastes in accordance with Company policies; and
- Once the site has been deemed safe for re-entry notify the Contractor to proceed with construction in the area.

PROJECT CLOSE-OUT & DOCUMENTATION – ALL WASTE

Contractor Responsibility

When the Contractor is handling, managing and disposing of waste material, the Contractor shall be responsible for providing the Company with the following documentation:

- Bills-of-lading and/or manifests, material shipping logs, or other waste transportation papers;
- Loading and disposal tickets from landfills or treatment facilities;
- Certifications of clean fill brought on-site for use; and
- Acceptance letters for waste disposal.