

Frequently Asked Questions

Alberta-Generated Non-oilfield Waste and Imported Oilfield Waste

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Q1. Can an AER-regulated oilfield waste management facility (OWMF) receive hazardous Alberta-generated non-oilfield waste for fluid disposal activities?

A1. No. Hazardous Alberta-generated non-oilfield waste received at an OWMF must have a recoverable component (i.e., considered a recyclable by Alberta Environment and Sustainable Resource Development [ESRD]). As a result, if the non-oilfield waste is classified as hazardous, the waste must either be processed for the purpose of producing a recoverable material (e.g., crude oil) or be received for the purpose of consolidation and transfer to an approved recycling facility.

Note that wastewater that results from the OWMF's activities (e.g., processing of waste) can be injected down the appropriate Class I disposal well.

Q2. Does an OWMF need to use the waste codes in appendix 3 of *Directive 047: Waste Reporting Requirements for Oilfield Waste Management Facilities* to describe the type of Alberta-generated non-oilfield waste the facility is to receive?

A2. No. If there is a more appropriate description of the waste than what is listed in appendix 3 of *Directive 047* (e.g., landfill leachate, truck-wash fluid, interceptor fluid, etc.), use that description.

Note that when reporting to Petrinex, the reporting code NONOFD must be used.

Q3. What amount of a recoverable component must be in the hazardous Alberta-generated non-oilfield waste stream in order for an OWMF to receive it?

A3. The AER does not prescribe a volume or percentage of a recoverable component that must be in the waste stream. The OWMF approval holder is responsible for knowing the capabilities and limitations of its facility and for ensuring that the waste generators are informed of these limitations. The approval holder is also responsible for ensuring that the OWMF receives only waste that the facility is approved to handle and that the OWMF is in compliance with its licences and approvals.

Q4. What type of information is the AER looking for to demonstrate that the Alberta-generated hazardous waste stream has a recoverable component?

A4. The AER has not prescribed the type of information. It is up to the approval holder to provide documentation demonstrating that the waste received at the OWMF has a recoverable component and that the facility is capable of recovering the component.

The following are two examples of what approval holders can submit to demonstrate that the waste stream has a recoverable component:

- analytical results from lab testing (by the generator or receiver)
- results from sample cuts of the waste stream taken during offloading activities to show the percentages of oil, solids, and water

To demonstrate that the OWMF is capable of recovering the recoverable component, the approval holder must be able to describe the OWMF's efficiency at processing waste, including what volume or percentage of oil can be recovered from the waste stream.

Q5. With the revisions to *Directive 058 – Addendum 2015-01-14*, the AER is no longer calling imported oilfield waste imported non-oilfield waste. Does this mean I can treat it as Alberta oilfield waste?

A5. No. Imported oilfield waste, which is generated from the exploration and production of oil and gas outside of Alberta, does not meet the definition of “oilfield waste” in the *Oil and Gas Conservation Rules*. Imported oilfield waste received at an OWMF must have a recoverable component (i.e., considered to be recyclable by ESRD).

Note that when reporting to Petrinex, the reporting code NONOFD must be used.

Q6. Why am I required to obtain ministerial authorization and a hazardous waste receiver personal identification number (PIN) from ESRD to receive imported hazardous oilfield waste?

A6. The *Environmental Protection and Enhancement Act (EPEA)* governs the importation and exportation of wastes, including oilfield wastes, into and out of Alberta. As set out in the *Waste Control Regulation* under *EPEA*, OWMF approval holders are subject to the waste classification, manifesting, and PIN requirements.

In a memorandum of understanding between AER and ESRD (attached to *Interim Directive 2000-3: Harmonization of Waste Management*), both regulatory agencies agreed that AER-regulated OWMFs may receive imported recyclables (non-hazardous and hazardous) provided that

- the recyclables are generated from the exploration and production of oil and gas,

- the waste management process produces a recoverable material (e.g., crude oil, clean rags, or pipes), and
- the facility approval authorizes receipt of the type of waste in question.

Q7. Can an OWMF accept imported hazardous oilfield waste if it has received approval only from the AER?

A7. No. AER approval holders must also obtain written ministerial authorization and PIN from ESRD. Only after all the approvals are in place can the OWMF start to receive imported hazardous oilfield waste.

Note: The AER must be provided a copy of the written ministerial authorization and the PIN.

Q8. Can an OWMF receive imported oilfield waste for fluid disposal activities?

A8. No. Imported oilfield waste received at an AER-regulated OWMF must have a recoverable component. As a result, imported oilfield waste streams must be received for the purpose of producing a recoverable material (e.g., crude oil) or for the purpose of consolidation and transfer to an approved recycling facility.

In addition, disposal scheme approvals issued by the AER stipulate that the fluids being disposed of must be generated within the province of Alberta.

Wastewater that results from an OWMF's activities (e.g., processing of waste) can be injected down an appropriate Class I disposal well.

Q9. What volume of a recoverable component must be in the imported oilfield waste stream in order for an OWMF to receive it?

A9. The AER does not prescribe a volume or percentage of recoverable material that must be in waste stream. The OWMF approval holder is responsible for knowing the capabilities and limitations of its facility and for ensuring that the waste generators are informed of these limitations. The approval holder is also responsible for ensuring that the OWMF receives only waste that the facility is approved to handle and that that the OWMF is in compliance with its licences and approvals.

Q10. What responsibilities do the generators have for sending Alberta-generated non-oilfield waste and imported oilfield waste to OWMFs?

A10. Generators of oilfield waste must adhere to the responsibilities in section 2.0 of *Directive 058: Oilfield Waste Management Requirements for the Upstream Petroleum Industry*.

Note that approvals for AER-regulated OWMFs contain the following condition: all non-oilfield waste (Alberta-generated and imported) destined for the OWMF must be

appropriately characterized and classified prior to receipt. This information must be documented and retained at the OWMF for five years.

Q11. What type of information is the AER looking for to support that imported oilfield waste has a recyclable component?

A11. It is up to the approval hold to provide documentation to support that the waste received at the OWMF has a recoverable component and that the facility is capable of recovering the component.

The following are two examples of what approval holders can submit to demonstrate that the waste stream has a recoverable component:

- analytical results from lab testing (by the generator or receiver)
- results from sample cuts of the waste stream taken during offloading activities to show the percentages of oil, solids, and water

To demonstrate that the OWMF is capable of recovering the recoverable component, the approval holder must be able to describe the OWMF's efficiency at processing waste, including what volume or percentage of oil can be recovered from a waste stream.

Q12. Our facility has been selected for an audit. How can we demonstrate compliance regarding the acceptance of imported oilfield waste?

A12. As a receiver you must be able to demonstrate that any imported oilfield waste has a recoverable component. This may be done by providing waste manifests, truck tickets, analytical results from lab tests that you've done, or analytical results provided by the generator, as well as by indicating what quality assurance / quality control (QA/QC) measures your facility has in place to verify waste streams.

You must also demonstrate that the facility has the capability to recover the recoverable component. This may be demonstrated through mass balances, process flow diagrams, and analyses of lab tests.

As mentioned in answer 9, an OWMF may not accept imported oilfield waste for direct disposal (i.e., fluid disposal). You may demonstrate compliance with this requirement by indicating the operational controls your facility has in place to prevent the diversion of imported oilfield waste to direct disposal areas of the facility.

Q13. Who can I contact at the AER if I have questions about Alberta-generated non-oilfield waste and imported oilfield waste?

A13. Send any questions to directive058@ aer.ca and a waste and storage application and compliance specialist will assist you.