

Frequently Asked Questions

How to Manage Impacted Hydrovac Material

February 2018

Q1. How do I determine whether the hydrovac material is impacted or non-impacted?

A1. If it is unclear whether the material has been impacted, it must first be contained and tested to determine whether the material has been impacted. Although field-testing methods are acceptable, laboratory analysis should be conducted if there is historical evidence to indicate potential impacts or if the field testing is uncertain. Ultimately, it is the licensee's responsibility to ensure that appropriate steps have been taken to determine whether the material is impacted or non-impacted.

Q2. What are the regulatory requirements for managing impacted hydrovac material vs. non-impacted hydrovac material?

A2. Impacted hydrovac material must meet the requirements of *Directive 058: Oilfield Waste Management Requirements for the Upstream Petroleum Industry* since it is considered an oilfield waste (tracking requirements will also have to be met). Non-impacted material is not considered oilfield waste; therefore, questions about managing non-impacted material can be sent to the following email addresses:

- AERAuth.OilGas@aer.ca
- AERAuth.Pipelines@aer.ca
- AERAuth.InSitu@aer.ca
- AERAuth.Mining@aer.ca

Dangerous Oilfield Waste and Non-DOW Hydrovac Material Management

Q3. How should I store and manage impacted hydrovac material?

A3. Storage must meet the requirements of *Directive 055: Storage Requirements for the Upstream Petroleum Industry*; therefore, it cannot be stored directly on the ground. Because management of the impacted material must comply with *Directive 058*, the material must be sent to an approved facility if it is dangerous oilfield waste (DOW) (see tables 4.1a and b of *Directive 058* for DOW properties). However, if it is impacted non-DOW and meets the

requirements in section 16 of *Directive 058*, it can be bioremediated and eventually used as fill material on the site of origin.

Q4. Can I send the impacted material to landfill?

A4. The impacted material must pass the paint filter test before being disposed of at the appropriate landfill, as outlined in *Interim Directive (ID) 99-4: Deposition of Oilfield Waste Into Landfill*.

Non-DOW Hydrovac Material Management

Q5. Is a notification or application required if bioremediation occurs on the site of origin?

A5. No, as long as all the requirements in section 16 of *Directive 058* are met.

Q6. Can I bioremediate the impacted non-DOW material on another site?

A6. Storage of impacted material on another site is only permitted possible if the site is within the same production system; however, notification to the Waste and Storage Group is required. section 4.2 of *Information Letter (IL) 98-2: Suspension, Abandonment, Decontamination, and Surface Land Reclamation of Upstream Oil and Gas Facilities* outlines the information that must be included in the notification (please note landowner consent is also required). The notification must be sent to [Directive058@aer.ca](mailto:Directive058@ aer.ca). The site must also be **active**; it cannot be located on an abandoned or suspended well site.

Q7. If I have non-DOW impacted material that is collected off lease, but I wish to store the material on the site of origin, is notification or an application required?

A7. No, as long as the impacts are directly related to the activities associated with the AER-licensed site, the impacted material can be temporarily stored or bioremediated at the site of origin, provided all requirements are met.

Q8. Can I have a standalone location to manage impacted non-DOW material from our different sites?

A8. The licensee would require an oilfield waste management facility approval for a standalone location. Public consultation and a security deposit must be posted and further *Directive 058* requirements must be followed. Please contact [Directive058@aer.ca](mailto:Directive058@ aer.ca) if you have additional questions.

Q9. Can I have a central location on an active site to store non-DOW hydrovac material for bioremediation?

A9. As long as the site is active, in the same production system and, under the same licensee, you can apply for a component approval. Public consultation will be required; however, a security deposit is not required. Please contact [Directive058@aer.ca](mailto:Directive058@ aer.ca) if you have additional questions.