

November 26, 2021

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CGL4703-CGP-BCEAO-REG-LTR-4953

Dear Mr. Smith,

**Re: Coastal GasLink Pipeline Project (Project)
Inspection Record IR2021-027 Opportunity to Respond
Environmental Assessment Certificate (EAC) #E14-03
October 14 to 21, 2021 Project wide inspection**

Coastal GasLink Pipeline Ltd (Coastal GasLink) is providing the following information in response to IR2021-027 received by email on November 9, 2021.

EAO Requirement 1: *NOT COMPLIANT with EN2020-011 regarding controlling the risk of sediment transport to Environmentally Sensitive Receptors, watercourses.*

Coastal GasLink Response:

On October 19, 2021 Coastal GasLink provided a response to Requirement 1 in regard to controlling the risk of sediment transport to Environmentally Sensitive Receptors, watercourses.

EAO Requirement 2: *NOT COMPLIANT with EN2020-011 regarding controlling the risk of sediment transport to Environmentally Sensitive Receptors, wetlands.*

Coastal GasLink Response:

On October 19, 2021 Coastal GasLink provided a response to Requirement 2 in regard to controlling the risk of sediment transport to Environmentally Sensitive Receptors, wetlands.

EAO Requirement 3: *NOT COMPLIANT with EN2019-003 regarding storing waste in animal proof containers.*

Coastal GasLink Response:

On October 19, 2021 Coastal GasLink provided a response to Requirement 3 in regard to storing waste in animal proof containers.

EAO Requirement 4: *NOT COMPLIANT Condition 26 of Schedule B regarding providing secondary containment for all chemical liquids and hazardous wastes.*

Coastal GasLink Response:

Coastal GasLink can confirm that actions have been taken to resolve the findings identified in IR2021-027. An update on specific locations and associated photo, where appropriate, have been provided below.

Sukunka MUS

The hydrocarbon containers (bulk containers) and other liquid chemical containers identified in IR2021-027 Photo 25 were staged for pickup and have been removed from site, please see Photo 1.



Photo 1: Previous location of bulk containers at Sukunka MUS.

The jerry cans identified in IR2021-027 Photo 26 have been removed from the skid and properly stored – see Photo 2 below.



Photo 2: Sukunka MUS - Jerry cans are no longer stored on the skid.

Parsnip MUS

The bulk oils e.g. hydraulic and motor oil and antifreeze identified in IR2021-027 Photo 27 are now stored in a covered storage area.



Photo 3: Parsnip MUS - Covered lubricant and antifreeze storage.

The barrels identified in IR2021-027 Photo 28 are empty methanol and methyl hydrate barrels and therefore were not placed in secondary containment as there was minimal risk of release to the environment. See Photo 4 below.



Photo 4: Parsnip MUS - The bulk chemical liquids stored without secondary containment were empty. The barrels identified in IR2021-027 Photo 29 and Photo 36 are now stored on a secondary container tray and the barrels have been covered with a tarp to prevent rain and snow from collecting in the tray (Photo 6).



Photo 6: Parsnip MUS - Secondary containment added, and containers covered with a tarp.

7-Mile MUS (Maintenance/ Laydown area)

The location of the bulk chemical liquid products noted at 7-Mile MUS has been changed and secondary containment established, see Photo 7 below.



Photo 7: 7-Mile MUS

MUS 9A

The liquid stored within the unmarked 1000 litre (L) plastic totes was diesel exhaust fluid (DEF). These totes have been removed from MUS 9A and are stored within a sea can near KP 588+300. Photo 8 and Photo 9 shows the same area as noted in Photo 31 from IR2021-027 confirming that the totes and the batteries are no longer stored in this location. Photo 10 shows the DEF totes stored in a sea can.



Photo 8: MUS 9A - DEF totes have been removed from site.



Photo 9: MUS 9A - DEF totes have been removed from site.



Photo 10: KP 588+500 - DEF totes stored in sea can container.

EAO Requirement 5: *NOT COMPLIANT* with Condition 26 of Schedule B regarding ensuring that ice, snow, or rainwater have not decreased the volumetric capacity for storage of a spill to be less than 125% of the containment area.

Coastal GasLink Response:

Monitoring of the spill trays and secondary containment has been increased to ensure that ice, snow or water do not decrease the volumetric capacity to less than 125% of the aggregate storage volume within that containment. Secondary containment has been discussed with the contractor and addressed during the daily toolbox meetings to ensure spill trays and secondary containment are emptied and rainwater and snow is removed as required. Description of site-specific actions are detailed below.

The water level in the sump, as shown in IR2021-027 Photo 33, was lowered and the pump and secondary containment are no longer situated within the pooled water (see Photo 11).



Photo 11: KP 205+700 - Pump and secondary containment on solid ground, the pump has been removed from this location

Photo 34, 35 and 37 of IR2021-027 show examples of secondary containment containing water under fuel containers and pumps. Please see Photo 12, 13 and 14 displaying the secondary containment with water and/or snow removed. The volumetric capacity of the secondary containment is now more than 125% of the fuel storage amount.



Photo 12: KP 224+500 - Secondary containment cleaned out



Photo 13: KP 223+578 - Spill tray under fuel containers has been emptied of water.



Photo 14: Spill tray has been emptied

7-Mile MUS (Maintenance/ Laydown area)

Secondary containment beneath light plant, identified in IR2021-027 Photo 38, has been re-positioned and emptied of water as shown in Photo 15 below. The pump and associated secondary containment shown in IR2021-027 Photo 39 has been removed from site.



Photo 15: 7-Mile MUS light plant secondary containment re-positioned and dry.

MUS 9A

Secondary containment at fuel island has been emptied of water however, due to a recent snowfall, snow will also need to be removed (see Photo 16). Used spill pads, noted in IR2021-027 Photo 40, were removed from the drip tray and disposed of properly.



Photo 16: MUS 9A fuel island - secondary containment covered by recent snowfall

The purpose of the grating at the fuel island (referenced in Photo 41 of IR2021-027) is to capture accidental releases during fueling of trucks/equipment. It does not serve as secondary containment for the fuel tanks as these tanks are double walled with secondary containment built into the unit itself. The pit below the grate is monitored regularly and pumped out as needed. This structure was emptied on October 22, 2021 to a nearby 1000L tote with an attached hydrocarbon filter. Since that time, heavy snowfall has blanketed the area, including the grated pit. During winter, it is challenging to empty snow and ice out of the grate area and determine if there is hydrocarbon contamination (see Photo 17). To account for this, drip trays are placed at all pumps and must be used during re-fueling (see Photo 18).



Photo 17: Grated area at MUS 9A fuel island.



Photo 18: Drip trays in use while re-fueling at MUS 9A.

Sukunka Laydown 12

The carwash location design has been revised and the wastewater catchment has been excavated below grade to increase storage capacity and geotextile walls added to contain materials which are dislodged from vehicles and equipment.



Photo 19: Sukunka Laydown 12 - Geotextile walls added to wash station.



Photo 20: A view of the excavated soils outside the wash station. Note an inverted weir in the top right constructed to mitigate against hydrocarbon release.

EAO Requirement 6: *NOT COMPLIANT with Condition 26 of Schedule B regarding enclosing camps with electric fencing to deter access to camps by bears.*

Coastal GasLink Response:

Updates to the man-gates at the Headwall MUS have been made as described below.

The bungy cords have been removed from the man-gates (as shown in IR2021-027 Photo 45) and replaced with latches to properly secure the gates.



Photo 21: Headwall MUS man-gates with latches installed.

EAO Requirement 7: *NOT COMPLIANT with Condition 26 of Schedule B regarding ensuring equipment is well maintained and free of fluid leaks.*

Coastal GasLink Response:

The spill to ground identified at Parsnip MUS (IR2021-027 Photo 46 and 47) has been cleaned up and repairs made to the generator to prevent further leaks.



Photo 22: The spill has been cleaned up and leak repaired.

Should you have any further questions please do not hesitate to contact [REDACTED]

Sincerely,

[REDACTED]

for

Coastal GasLink