

# Decommissioning Plan Report

## St. Catharines Glendale Avenue Plant Renewable Biogas Cogeneration Project

### 1.0 Introduction

#### 1.1 Purpose

The purpose of this report is to outline the process required to decommission the equipment associated with the proposed renewable biogas cogeneration project. The report fulfills the requirement under the Renewable Energy Approval process.

#### 1.2 Project Location

St. Catharines Glendale Avenue Plant is located at 570 Glendale Avenue in St. Catharines. The facility is an automotive parts manufacturing facility producing engines and transmissions, including ancillary and support processes, operations and activities. The entire facility consists of approximately 2.08 million square feet (193,232 square meters) of floor space on 142 acres (57.4 hectares) of land. The proposed site for the renewable biogas cogeneration project is within the existing footprint of the facility around the southwest corner of the site.

### 2.0 Decommissioning Procedure

If the project is not extended past its planned commercial operational life, the project will be decommissioned using established processes at the manufacturing site.

When major processes and equipment at GM are shutdown, a project is typically approved to decommission the equipment. If it is just idled, energy sources would be terminated and equipment cleaned of hazardous materials. If the equipment is to be removed, skilled trades and contract workers would be engaged for the project.

The facility has established a “Disposal or Relocation of Equipment, Machinery and Components” procedure under its ISO14001 Environmental Management System to ensure obsolete equipment and machinery is clean and free of liquid and hazardous materials prior to disposal of the equipment to ensure environmental impact is minimized or eliminated. These procedures will manage the decommissioning activity of this project.

When the equipment is taken out of service, any fluid is drained and disposed according to waste management requirements. If necessary, the equipment is cleaned to remove any oily residual on the exterior. The equipment is then inspected by the facility environmental department to ensure all environmental risks have been minimized prior to storage or disposal. The environmental department will complete an inspection checklist and affix an approved equipment removal tag to the equipment.

Some of the equipment, such as engines and pumps, may be reused or sold. If necessary, the equipment may be stored onsite until it is reused or sold. Alternatively if the equipment is deemed to be a waste, it may be sent for salvage or disposal by the facility Resource Manager.

### **3.0 Restoration of Land and Water Negatively Impacted**

The project is located in an industrial facility. The area is paved and the project will be located inside an existing building at the facility. The decommissioning of the project equipment is not expected to negatively impact the land or water surrounding the project.

If during decommissioning it is necessary to remove excess materials, such as soil and concrete, the facility has an established ISO 14001 Task Instruction "Management of Excess Materials" for managing the excess materials prior to disposal.

### **4.0 Management of Excess Materials and Waste**

Excess materials generated at the facility are required by GM policy to be tested for potential environmental concerns. The test also allows for proper classification and characterization of excess materials. The result of the test will determine if excess materials can be reused onsite or if they are considered waste.

If it is deemed acceptable for reuse onsite, the excess materials may be reused during site reclamation landscaping or visual and sound barrier purposes or it will be shipped offsite to an approved facility. If determined to be waste, the excess materials will be managed in accordance with waste management requirements.

### **5.0 Environmental Emergency and Response**

In the event of an environmental emergency during the decommissioning activity, the facility has established a procedure to handle the environment emergency. For example, if a spill of fluid occurred during equipment decommissioning, the facility will activate the emergency response protocol, which includes spill response, cleanup and agency communications.