



**CONESTOGA-ROVERS
& ASSOCIATES**

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February 8, 2011

Reference No. 046254

Director
Ontario Ministry of the Environment
Environmental Assessment and Approvals Branch
2 St. Clair Avenue West
Floor 12A
Toronto, ON M4V 1L5

Dear Sir or Madam:

Re: Decommissioning Plan Report
Woolwich Bio-En Inc., Elmira, Ontario

1.0 INTRODUCTION

Conestoga-Rovers & Associates (CRA) provides this letter, on behalf of Woolwich Bio-En Inc. (Bio-En), to meet the requirements of the Decommissioning Plan Report as outlined in the Ontario Ministry of the Environment's (MOE's) Ontario Renewable Energy Approval (REA) Regulation (O.Reg. 359/09). This Decommissioning Plan Report supports Bio-En's application for REA for its proposed Anaerobic Digestion (AD) facility (Facility) to be located at 40 Martin's Lane in Elmira, Ontario.

The Bio-En AD Facility is intended to operate over the long-term. In the event that the Facility must cease operations and undertake decommissioning procedures, a Facility Closure Plan, detailing the decommissioning actions to be undertaken and the schedule for completion will be prepared and submitted to the MOE District Manager.

2.0 ACTIVITIES RELATED TO DECOMMISSIONING OF THE FACILITY

2.1 Decommissioning During Construction

The following section describes the Decommissioning Protocol for the Facility in the event of abandonment of project during construction. The need for this is based on the fact that typical renewable energy projects (wind, solar) serve no other purpose than their intended design use and abandonment of such project would result in an unusable site. Biogas facilities, however, consist mainly of tanks and a storage building which hold intrinsic value for other



non-renewable energy industrial uses with minimal changes necessitated. These projects can easily be sold for other use and, thus, site restoration should not be obligatory.

2.2 Decommissioning after Ceasing Operations

2.2.1 Procedures for Dismantling and Demolishing the Facility

In the event that Facility ceases to be operational as a biogas facility, it is probable that the site may be sold for other reuse. The following decommissioning steps are to be taken to prepare the site for non-used/sold for other purpose:

- 1) Removal and disposal of biomass and process materials
- 2) Disconnect process and generation systems from electrical service (lighting and basic electric to remain)
- 3) Clean interior of building
- 4) Clean interior of digester and other tanks

In the case that all electrical equipment and associated ancillary equipment would be removed from the site they would be decommissioned in the following manner:

- Pole Lines: The above ground electricity poles will be of standard design, therefore the poles would be reused elsewhere. Upon removal of the poles, the soil would be backfilled.
- Conductors: The conductors to be used at the Facility will be of standard design, but if actual device could not be reused or sold, the steel and copper metal components would be recycled as scrap metal.
- Switchgear: The switchgear will be of standard design, but if the actual device could not be reused or sold, the steel and copper metal components would be recycled as scrap metal.
- Transformer: The transformer used at the Facility will be unique to the project and it may be difficult to find a matching use. The transformer oil would be drained and reused and the transformer steel would be recycled as scrap metal.
- Foundations: The concrete and aggregates used for the foundation of the transformer would be broken up and removed to be reused as aggregate material elsewhere.

It is anticipated that the Facility will be used for another purpose upon ceasing operations. Therefore, it is not anticipated that the storage tanks and buildings will be dismantled and demolished. If these components are to be dismantled and removed, these details will be provided in the Facility Closure Plan.



A further plan outlining continued maintenance of non-used facilities is to be generated at time of decommissioning.

2.2.2 Activities Relating to the Restoration of any Land or Water Negatively Impacted by the Facility

Bio-En will be responsible for restoring any land or water that may be negatively impacted by the Facility or the associated ancillary features. It is not anticipated that there will be any impact to water or soil from the ancillary features of the Facility. The hydro lines will be above ground and if the electricity poles are removed, the soil will be backfilled, and will not result in contamination. If there is a spill from either the waste, or the transformer oil on site that requires remediation, Bio-En will hire an environmental consultant to remediate the land or water as required by the MOE. Bio-En does not anticipate any negative impacts to the soil or water resulting from the operation of this Facility.

2.2.3 Procedure for Managing Excess Materials and Waste

Following the decision to end operations at the Facility, Bio-En will commence the closure process by ceasing to accept waste. The Facility will continue operations until all organic waste at the Facility has been processed. Alternatively, incompletely processed material may be pumped from the digester and storage tanks and transferred to another approved digestion facility to complete the process, or to be disposed at an MOE approved facility.

Bio-En will transfer all digestate off-site to be used as a soil amendment, a fertilizer or to be disposed of at an MOE approved facility. All residual waste at the Facility will be transported off-site for final disposal at an approved facility.

Bio-En will provide details of the removal of any of the Facility's buildings or tanks as they relate to the site's future use in the Facility Closure Plan. It is anticipated that all components that will not be used for the site's future use will be removed by licensed haulers and disposed of at MOE approved waste management facilities (recyclers or other facilities as applicable).

2.2.4 Emergency Response and Communications Plan

The Facility Emergency Response and Communications Plan is discussed in Section 11 of the Facility's Design and Operations Report.

2.2.5 Decommissioning Notification

The Facility will notify the MOE prior to the decommissioning of the Facility.



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2.2.6 Financial Assurance

Financial Assurance information has been presented in the Design and Operations Report.

Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

John Ferguson, P. Eng.

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