



**ENVIRONMENTAL PLANS
VOLUME 10
COMPLIANCE MANAGEMENT PLAN
NEB CONCORDANCE TABLE
FOR THE
TRANS MOUNTAIN PIPELINE ULC
TRANS MOUNTAIN EXPANSION PROJECT**

**March 2018
REV 1
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Prepared for:



TRANSMOUNTAIN

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INTRODUCTION

Trans Mountain Pipeline ULC (Trans Mountain) submitted a Facilities Application (the Application) to the National Energy Board (NEB) in December 2013 for the Trans Mountain Expansion Project (the Project or TMEP). The Application includes Environmental Protection Plans (EPPs), Environmental Management Plans (EMPs) and NEB Condition Plan Reports. These plans were developed to communicate environmental procedures and measures to the Project construction and inspection personnel in a clear and concise format. Mitigation measures will be implemented, where warranted, during construction and reclamation of the Project to avoid or reduce potential adverse environmental effects during construction. A Certificate of Public Convenience and Necessity and other authorizations allowing the Project to proceed were issued and became effective on December 1, 2016, subject to 157 conditions (the NEB Conditions). A British Columbia (BC) Environmental Assessment Certificate was also issued, subject to another 37 conditions, known as the BC Environmental Assessment Office (BC EAO) Conditions.

An updated Compliance Management Plan (Volume 10 of the Environmental Plans) was prepared and submitted to the NEB in September 2017. Condition Compliance Letter Report No. 9 directed Trans Mountain to conduct a complete quality review of the Environmental Alignment Sheets (EAS) (Volume 8 of the Environmental Plans) and Resource-Specific Mitigation Tables (RSMT) (Volume 7 of the Environmental Plans). The current Compliance Management Plan (Rev 4) has been updated to ensure that any changes as a result of Condition Compliance Report No. 9 were incorporated where necessary. Trans Mountain's response to NEB Event Reporting File CV1718-355 Information Request (IR) No. 5 on March 9, 2018 outlines the changes made as a result of that IR. This concordance table was prepared to document revisions to the updated Compliance Management Plan that have occurred since the last version was filed with the NEB in October 2017.

TABLE 1

COMPLIANCE MANAGEMENT PLAN NEB CONCORDANCE TABLE

Section	Sub-heading	Update/Change	Reason
Various	Various	Updated wording, capitalization	Minor edits
1.0 Introduction	N/A	Environment, Health and Safety Policy Statement	Updated version available December 2017
1.0 Introduction	1.2 Project Description	Removal of "Contingency Alternate Routes" and "Variances"	2017 activities, no longer relevant
2.0 Tracking Trans Mountain Expansion Project Compliance Requirements	2.1 National Energy Board Condition Compliance	Sub-heading added	Heading was missed in previous revision
2.0 Tracking Trans Mountain Expansion Project Compliance Requirements	2.2 Commitments	Removed Information Request (IR) references	No longer required
2.0 Tracking Trans Mountain Expansion Project Compliance Requirements	2.2.1 Commitment Review Process	Removed references to versions of Commitment Tracking Table filed	No longer required
2.0 Tracking Trans Mountain Expansion Project Compliance Requirements	2.5 Environmental Plans	Added definition of environmental plans use	More definition
3.0 Compliance Verification	3.2.6 Continual Improvement	Updated sub-heading title	To align with NEB definitions
4.0 Environmental Compliance	4.2 Environmental and Compliance Education Program	Entire sub-section including Table 4-1 updated	Further define and clarify Education Program
4.0 Environmental Compliance	4.3 Environmental Compliance Measure	Removed "hard copies" of permits, approvals, etc.	All copies of the permits, approvals, etc. are contained within the Project Permit Binder as discussed in section 2.6

TABLE 1 Cont'd

Section	Sub-heading	Update/Change	Reason
4.0 Environmental Compliance	4.4 Field Level Environmental Change Management	Footnotes to address EP measures not implemented due to safety concerns of due to extra costs resulting from the procedural change.	Included in revision 3 of CMP filing in October 2017, included to reference CV1718-355 IR No. 5 item no. 8 (NNC#1) implementation
4.0 Environmental Compliance	4.5 Environmental Work Shut Down Procedure	Clarification on project manager and environmental manager roles for implementing an activity shut down and/or resumption of work	Update to reference NEB CV1718-355 IR No. 5 item no. 8 (NNC#1) implementation
4.0 Environmental Compliance	4.6 Issue Monitoring and Mitigation Development	Minor updates	To align with current terminology used in TMEP Environmental Reporting Standard filed with the NEB in accordance with CV1718-355 NNC#2 extension
5.0 Incident Reporting and Documenting	5.1 Statutory Reporting	Reference to Appendix B (Regulatory Reporting Guidelines for TMEP Incidents) removed	Refer to TMEP ERP Appendix E for complete reportable incident table
5.0 Incident Reporting and Documenting	5.1 Statutory Reporting	Updated Appendix reference for NEB Detailed Incident Report Form example	Removal of Appendix B (Regulatory Reporting Guidelines for TMEP Incidents)
5.0 Incident Reporting and Documenting	5.2 Reporting of Health and Safety Incidents to Government Authorities	Updated KM Contractor Incident Report form title	Form updated in late August 2017
5.0 Incident Reporting and Documenting	5.3 Environmental Release and Event Reporting to Government Authorities	Updated Appendix reference for Reportable Spill Volumes	Removal of previous Appendix B
Appendix A		Roles and Responsibilities table and description updates	Updated in accordance with NEB CV1718-355 IR No. 5 item no. 9 (NNC#1) implementation
Appendix B		Removed table for Regulatory Reporting Guidelines for TMEP Incidents	Complete reportable incident table can be found in TMEP ERP appendix E (Reportable Incidents to Regulatory Authorities Including NEB)
Appendix B		Updated to Detailed Incident Report	Removal of previous Appendix B
Appendix C		Updated to Reportable Spill Volumes table; includes reference to updated BC MOE regulation effective October 2018	Removal of previous Appendix B
Appendix D		Updated to Emergency Contacts table; minor contact number updates	Removal of previous Appendix B
Appendix E		Updated to Contractor Compliance Management Plan table of contents	Removal of previous Appendix B
Appendix F		Updated to Inspection Measurement and Monitoring Procedure	Removal of previous Appendix B