

# Hazardous Waste

Letter to the Ministry of the Environment on Safety-Kleen's Incineration Proposal

January 5, 2001

Application Processor  
Environmental Assessment and Approvals Branch  
2 St.Clair Avenue West, Floor 12A  
Toronto, Ontario  
M4V 1L5

**Re: EBR Registry Posting IA00E1862 - EPA s. 9 - Approval for discharge into the natural environment other than water (i.e. Air)**

Dear Sir/Madam,

I am writing to you regarding Safety Kleen's proposal (EBR Registry # IA00E1862) to permit increased feed rates for lean and intermediate heating value wastes and to permit the use of an auxiliary feed port at its incinerator in Corunna, Ontario.

The Canadian Institute for Environmental Law and Policy has a number of questions and comments on this proposal.

Increasing the total volume of waste being incinerated

We contacted Randy Brown at the MOE office in Sarnia and requested clarification as to whether the application is requesting an increase in the volume of wastes being incinerated. Mr. Brown confirmed that Safety-Kleen is proposing an increase in the volume of waste (litres per minute) being incinerated.

We have strong concerns about allowing increased volumes of wastes to be incinerated at the Corunna facility. We are particularly concerned about the potential increase in emissions of toxic compounds from the incinerator and the impact on the local air quality and human health population in southwestern Ontario. Much is known about the toxic effects of contaminants that may be released from waste incinerators including lead, mercury, dioxin, and furans.

In CIELAP's June 2000 report entitled Ontario: Open For Toxics, the Safety-Kleen incinerator was ranked as the 7th largest receiving facility of hazardous waste in Ontario, having received 69,430 tonnes of hazardous waste (primarily non-halogenated lean organics) in 1998. Approximately 33,000 tonnes of this waste was received from U.S. generating sites.

In the EBR posting, it is stated that in a 1998 stack test, the emission rate of most compounds was reduced when the feed rate was increased. We have not had the opportunity to review these supporting documents, and have several questions at this time.

Our questions about the proposal are as follows:

The 1998 stack test showed that the emission rate of most compounds was reduced when feed rates for lean and intermediate heating value wastes were increased. Does the reduction in emission rates for most compounds offset the fact that greater quantities of waste are being incinerated? In other words, will there be an increase in the total quantity of compounds emitted into the air?

Our concern is that the reduction of the emissions rate of most compounds will not be significant and the total quantity of toxic pollutant emissions may in fact increase due to the greater volume of waste being incinerated. The human health and environmental impacts of environmental contaminants from incinerators is well documented.

As we have not had a chance to review the supporting documentation, it is important to identify which compounds are reduced and by how much when feed rates are increased. Also, are there any compounds that were not reduced or increased and what are the associated environmental implications?

### **Local Resident Concerns**

Many local residents have expressed concerns about safety and environmental issues regarding the Safety-Kleen facility in Corunna. Given the concerns of local residents expressed by the local MPP Carolyn Di Cocco on several occasions in the legislature and in the media, we request that the Ministry consult with local residents when reviewing this application.

The Institute would be pleased to respond any questions you may have regarding our comments on the Safety-Kleen proposal.

Yours sincerely,

**Anne Mitchell**  
**Executive Director**

Cc: Gord Miller, Environmental Commissioner of Ontario