

# Reach

**FOR UNBLEACHED!**

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Mike Wong, Regional Waste Manager,  
BC Environment, Lower Mainland Region,  
15326 103A St., Surrey BC V3R 7A2  
Fax: 604-584-9751

RE: PR-14337

Dear Mike Wong:

I am pleased that the application of Macmillan Bloedel Powell River to discharge effluent sludges has been suspended.

However, I wish to appeal the decision of the Ministry to allow the discharge of power boiler grate ash, on the following grounds:

- \* the ash has been poorly characterized,
- \* only one test, dated July 16 1993, for dioxin/furan TEQ analysis, has been provided with the application. The tests for dioxin/furan provided for the secondary sludge (for example) reveal a non-linear variation from 15 ppt to 430. Under these conditions of wide variability, which are typical of pulp mills, one test is insufficient to determine the dioxin content of waste material.
- \* some tests for organic contaminants in the ash, carried out in 1994/95, were not provided to the Ministry (or the public) as part of the original application, and
- \* those tests indicate that the grate ash contains levels of DEHP which it might not be prudent to spread on roads as a "dust suppressant"
- \* the ash has apparently never been tested for chlorinated or non-chlorinated phenolic compounds
- \* the grate ash appears to be 5% aluminium (?) and a more beneficial re-use might be to recycle the metals. Aluminium can be environmentally active and is known to be toxic to trees. It may not be appropriate to spread on logging roads.

## Advisory Board

Carol Dansereau, Director,  
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Keith Heidorn,  
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Environment Officer,  
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Paul MacGillvray, BSc

\* it remains unclear (from the original application documentation) whether this permit is for an experiment or for a wholesale broadcast of ash on MB's privately-owned roads: "If feasible. . . the permit will be amended to accommodate this total annual output" of 1800 tonnes.

\* if experimental, the permit should spell out in detail the actual design of the experiment, including a schedule for testing for designated parameters, and site design to monitor and capture run off. (In the absence of a complete characterization of the ash, it is impossible to know whether any toxic run off will occur. )

\* Since roads are usually constructed with ditches to carry runoff away, (eventually to a nearby watercourse), the control of leachate requires attention to site design and this should be specified in the permit.

\* this permit violates the precautionary principle and there is insufficient information to tell whether it endangers workers, the community, and the environment.

I sincerely hope that you will consider this appeal, withdraw the permit, and refer the issue for more study.

Delores Broten,  
Executive Director.

cc: Drew Kilbeck, Powell River mill  
Bill Andrews, West Coast Environmental Law