

Reach

FOR UNBLEACHED!

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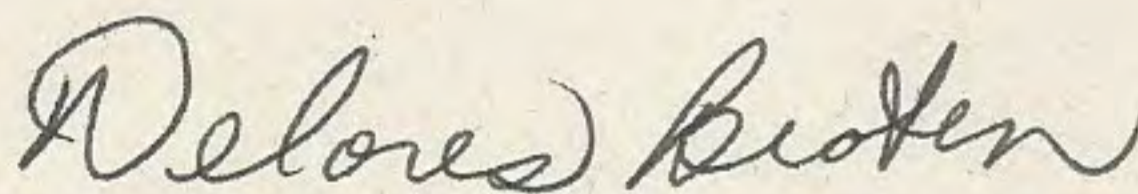
Director of Waste Management,
4th Floor, 777 Broughton St.,
Min. of Environment, Lands and Parks,
Victoria, BC V8V 1X5
Fax 604-356-9836, 1 page

Re: your file PR-14337

I wish to seek a stay of execution in the matter of the application of power boiler grate ash, because:

- * the ash has been poorly characterized,
- * only one test, dated July 16 1993, for dioxin/furan TEQ analysis, has been provided with the application.
- * 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
- * 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.
- * 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.

I sincerely hope that you will consider this appeal, issue a stay of execution, and refer the issue for more study.



Delores Broten,
Executive Director

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