

April 4, 1996

To: Moe Sihota, Minister of Environment, Lands and Parks

Dear Sir, the Pulp, Paper and Woodworkers of Canada commend the work that your ministry has accomplished in environmental protection in a very short time and in particular, the area of secondary treatment for the pulp and paper industry.

However, we do have an immediate concern which we feel needs your attention. It has been confirmed by our members from different areas of the province that pulp mill sludge is being removed from on-site locations.

The sludge, in our view, should not be used for agricultural land distribution additives for cattle food, private or commercial market gardens, or landfill makeup where streams and waterways are directly adjacent to the dumping of this material.

The PPWC is well aware that in North America no substantial testing of sludge has been carried out. Apart from the known facts that this substance contains heavy metals, chlorine dioxide, bleaching residue, chlorate, residual chemical contaminants and a real concern for dioxins and furans.

Other than the test burn conducted at Elk Falls by Environment Canada, no other tests, to our knowledge, have been carried out with conclusive results. Because of money restraints, as reported by the Federal government, this test in itself did not go far enough to dispel all concerns for worker and community health.

Having given you a very brief preliminary summary of our concerns, we are asking that you look at the following example of dispersement of pulp mill sludge.

Castlegar area – from the Celgar Pulp Mill

1. 100 tons to an Xmas tree farm.
2. 500 tonnes to Cominco for landfill. (dispersement, sensitive area or control over leachate not known).
3. Many tonnes are presently being spread on the foreshore of the Columbia River in windrows in front of the mill.

This is only one example of usage of this material that we have identified.

We believe that this sludge is not suited to any usage other than those factors that control mill waste through the permit structure. It is of further concern to us that once this material leaves the mill site there is absolutely no control over its usage.

Would you please reply at the earliest possible date as to the minister's position on the usage of sludge outside of the present landfill and incineration practices on-site.

What conditions, standards, policies or permits are in place to allow Celgar to disperse their sludge in such a manner, and of equal importance, what parameters apply to this sludge substance, where known suspected carcinogenic substances are part of its make-up, province-wide?

Since the floodgates seem to have been relaxed for industry to move its growing stockpile of waste, we would appreciate a speedy reply regarding this issue. Respectfully, Fred Henton, Environmental Officer PPWC National