



**Bennett Environmental Inc.  
Proposed KL Thermal Oxidizer Facility**

**Addendum to Background Document 1  
BEI Business Opportunity**

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Submitted by:  
Bennett Environmental Inc.  
220 – 2560 Matheson Blvd East  
Mississauga, Ontario  
L4W 4Y9

Page 8 of 19

### 3.1.1 ONTARIO LANDFILLS

According to a Canadian Institute for Environmental Law and Policy (CIELAP) report<sup>12</sup>, one secure landfill in Sarnia, Ontario alone *"received 254,295 tonnes of hazardous waste in 1998, the primary waste type received being organic wastes."*

BEI anticipates that expected landfill disposal restrictions, and changes to hazardous waste classification tests will cause a portion of this material to be diverted to treatment facilities such as RSI and the proposed Kirkland Lake facility.

If we make the assumption that 25% of the presently landfilled material consists of organic contaminated solids; and that this material is diverted to treatment facilities, then approximately 50,000 tonnes/year of organic contaminated solids from this Ontario landfill alone will require treatment. This amount could fill about 25% of the proposed Kirkland Lake facility treatment capacity.

The discrepancy between above values, 50,000 tonnes/year represents Ontario generated waste, whereas 254,259 tonnes/year in 1998 represents imported material.

Page 12 of 19

## 4.4 OPERATIONAL RATIONALE FOR SERVICE AREA

BEI proposes to accept waste from NAFTA signatory countries. This will help to achieve Canadian federal commitments to deal with POP's, and recognizes the transboundary nature of the movement of these wastes, existing free trade agreements that Canada has with other countries, and current market conditions for soil availability for the Kirkland Lake facility.

BEI will comply with all Federal and Provincial legislation including observing the PCB import ban that is currently in effect.

The market for the treatment of contaminated soil and solids tends to be seasonal in nature for the Canadian market. The investment required to build and to maintain a facility that can destroy these materials in an environmentally sound manner requires consistent throughput. Foreign sources complement domestic ones and help smooth out the business cycle. A high throughput facility also reduces unit treatment cost for both domestic and foreign consumers of this service.

Importation of contaminated soil from NAFTA countries is essential to the sustainability of the proposed project. Sustainability of the proposed project means strength in Canada's waste management industry, and the maintenance of sufficient domestic capacity to ensure long-term, cost-effective and environmentally responsible management of contaminated soils and hazardous waste.