



The Community Environmental Liaison Committee is a group formed to provide a link between Bennett Environmental Inc. and the community of Belledune. Our role is to gather relevant information about the plans and priorities of Bennett Environmental in the northeastern New Brunswick, and pass this information along to local residents.

As a co-chair of the committee, Bennett is committed to providing timely and accurate information to the community at large. For this issue, we asked Bennett questions about the transport of materials, please find the details of our discussion below. If you have any extra questions we did not cover, please contact us by email at:

belledune\_CELC@hotmail.com, or by regular mail at  
P.O. Box 1004, Belledune, NB E8G 2X9.

**CELC: Where are the soils coming from?**

**Bennett:** We can receive material from anywhere in Canada and the United States. Soils get contaminated from spillage or by the underground movement of contaminants. Hydrocarbons can originate from leaking underground or above ground storage tanks. Creosote has been commonly used to preserve telephone posts and railway ties. Such manufacturers are among Bennett's largest clients.

**CELC: What types of contamination can you receive?**

**Bennett:** We can only accept non-chlorinated hydrocarbons and creosote.

**CELC: What are non-chlorinated hydrocarbons and creosote?**

**Bennett:** A non-chlorinated hydrocarbon is an organic compound containing only carbon and hydrogen and often occurs in petroleum, natural gas, coal and bitumen. The Bennett facility will be treating soil contaminated with non-chlorinated hydrocarbons.

Creosote is a brownish oily liquid consisting chiefly of aromatic hydrocarbons obtained by distillation of wood tar and used especially as a wood preservative. There are no chlorinated compounds in creosote. The Bennett facility will be treating soil contaminated with creosote.

**CELC: How do you know exactly what is in the soil?**

**Bennett:** Before Bennett can agree to accept material, the client has to fill out a Waste Profile Questionnaire, which gives site history and lists the contaminants in the soil. After an accredited environmental laboratory has done detailed analysis, we know every contaminant in that soil and the concentration. If the results show that the soil meets our operating permit, then we can start the permit process under the Export and Import of Hazardous Waste Regulations under the Canadian Environmental Protection Act (CEPA).

**CELC: How can the public be sure that you are importing what you say you are?**

**Bennett:** We have an On-Site Transportation Coordinator for each project location. This Bennett employee supervises and coordinates the shipments from each site. Our coordinators are trained in Hazardous Waste Operations and Emergency Response procedures.



The truck picture to the right is an example of a truck that will be used to transport soil from sites to the Bennett facility

**CELC: What has to happen before you can send a shipment of soil from the United States?**

**Bennett:** It is not a simple process to move hazardous material between the US and Canada. There are a lot of legislated checks

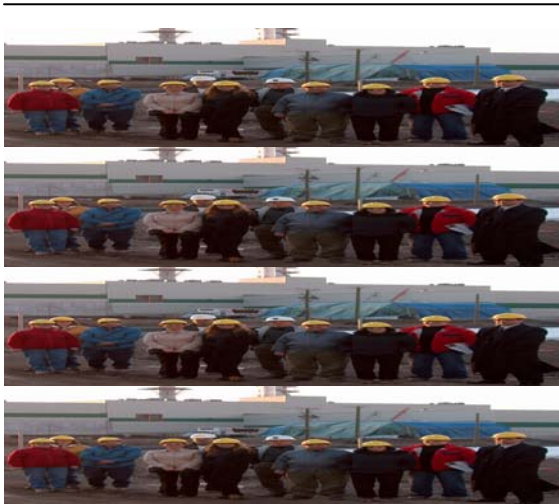
and balances in place in the two countries to make sure both governments know what the other has approved and what exactly is being moved.

**In Canada:**

- An Import/Export Agreement is signed by both the client (generator) and Bennett; it indicates the material will be treated in accordance with our permit, that completed copies of the Canadian manifest will be submitted to Environment Canada and that if material is received that cannot be treated in accordance with the permit then it must be sent back to the generator unless Bennett helps find a permitted alternative.
- A Notice to Environment Canada (EC) is submitted next with the completed Import/Export Agreement. This Notice is used by EC to match the shipment information with EPA records and to determine compliance with our permit.
- If everything in the Notice, the Import/Export Agreement and Intent to Export is correct and satisfactory, Environment Canada provides a Written Confirmation that states the material classification and amount for shipment, trucking company and the timeframe for shipping.

**In the United States:**

- An Intent to Export letter is sent by the generator to the US Environmental Protection Agency (EPA), indicates the amount of material for export, US exit point, Canada entrance point, final destination, and regulated material classification.
- After EPA has confirmed with EC that the shipment is permitted, they send an Acknowledgement of Consent to Export, that details what the material is, how much is to be shipped, the destination and the timeframe for shipping.



On April 15th, the CELC meeting took place at the construction site of Bennett's facility. Everyone in attendance received a tour inside the structure by the Plant Manager. We would also like to remind you that Bennett was required to submit to the NB Department of Environment and Local Government for approval, both a Groundwater Monitoring Plan and Soil Monitoring Plan. Both of these documents were approved in 2003. Since that time, two pre-operational monitoring events for soil have taken place, including the preparation of the appropriate reports.

The CELC has arranged to have these reports available for review at the Bennett office in Belledune at 112 Shannon Drive, Unit 6. To view these documents, please call Dawn Tardif at 522-2325.

Please watch for our next flyer where we will provide more detailed information on what happens when a shipment of soil arrives at the Bennett facility.