



Schedule A
182-2002

CANADIAN ENVIRONMENTAL LAW ASSOCIATION
L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

May 17, 2001

Mr. Ken Smith
Engineering Specialist - TECHNOLOGY STANDARDS SECTION
Ministry of the Environment
6th Fl., 40 St Clair Ave. W.
Toronto, ON M4V 1M2

Dear Ken:

Further to recent exchanges of telephone messages, we are pleased to submit revisions to our proposal on pollution prevention planning for incinerators dated February 2001. The revisions detailed below takes into account your latest telephone message of May 14, 2001 indicating that there may be up to \$10,000 available to undertake the project. The total amount of this proposal is \$9,947.50.

The proposed project is intended to feed into the discussions of the Canadian Council of Ministers of the Environment in the development of pollution prevention planning for incinerators. CELA finds the proposed project an excellent opportunity to further its support of pollution prevention planning given our historical participation on the issue on the national level through the review of the *Canadian Environmental Protection Act*, international and provincial levels through its work on the *Great Lakes Water Quality Agreement* and the negotiations towards the development of a global treaty on persistent organic pollutants among others.

As noted in our original proposal, we propose:

1. To draft a survey paper outlining the pollution prevention options and opportunities for waste incineration; and
2. To present this paper to the core advisory group or another group as designated by the CCME.

The provision dealing with pollution prevention in the CWS itself defines the range of issues that are to be followed in developing the pollution prevention strategy. That provision included the following:

- *Waste diversion initiatives to minimize the generation of waste destined for disposal (waste reduction, material reuse options);*
- *Waste segregation initiatives aimed at materials with greater potential to generate emissions of dioxins and furans or other air pollutants of concern (e.g., mercury, other heavy metals);*

Schedule A
182-2002

- *Combustion control strategies to optimise performance of existing combustors at destroying pollutants of concern;*
- *Use of alternative disposal or treatment technologies (e.g., anaerobic digestion of wastes with material recovery and combustion of biogas).*

Given the reduced budget available and the timeframe required to complete the report, we are proposing to focus our activities on bullet points 1 and 2. Our original proposal indicated that we would include an investigation of alternative disposal or treatment technologies. Our report will no doubt provide a brief reflection on this issue, however, to provide a detailed assessment of the current alternative disposal or treatment technologies available require more resources and time that is unavailable to the project team currently. We will not address bullet number 3 as indicated in our original proposal because that option is more akin to a pollution control approach.

For the above exercise, our efforts will focus on pollution prevention approaches for hazardous waste incinerators, solid waste incinerators, medical waste incinerators, and sewage sludge incinerators.

Project Team

The project team will include Lisa McShane and Fe de Leon, researchers at the Canadian Environmental Law Association, Paul Muldoon, Executive Director of CELA and John Jackson, board member of CELA. Ms. McShane and Ms. de Leon will undertake the research activities for this project, while John Jackson and Paul Muldoon, will provide editorial and managerial oversight for the production of the final report. This would include the development of a terms of reference for the production of the final report and making formal presentations of the findings to the Development Committee addressing incineration and the consultations related to its work.

Research activities will include an internet search of related activities, communication with government departments, municipalities, industrial companies and other environmental non-government organizations addressing the issue of incineration. Research will commence upon agreement of the proposal.

The timeframe for completion of the project deliverable will be negotiated between the Development Committee and CELA. As indicated in a previous paragraph, the findings of this exercise will be relevant to the discussions around the development of pollution prevention planning for incinerations.

Proposed Revised Budget

The proposed budget has been reduced from the original \$20,000 to reflect the amount that will be required to effectively address the focus of the project listed above.

*Schedule A
182-2002*

Revised budget

Research and writing		
Lisa McShane	10 days @ \$300 per day	\$3,000.00
Fe de Leon	10 days @ \$300 per day	\$3,000.00
Editing and Presentation of Report		
John Jackson	3 days @ \$400/day	\$1,200.00
Paul Muldoon		in-kind
Expenses		
Long distance/fax		\$ 500.00
Courier		\$ 150.00
Miscellaneous		\$ 800.00
Overhead & Administration		
15%		\$1,297.50
TOTAL		\$9,947.50

We hope that the above details provide you with relevant information to proceed with the project. Please do not hesitate to contact us, should you require additional information. We look forward to hearing from you.

Yours truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Paul Muldoon
Executive Director

c.c. John Jackson, Sarah Miller, Lisa McShane, Fe de Leon