Temiskaming Federation of Agriculture
RR 1 Englehart, Ontario P0J 1H0

January 28, 2002

Mr. Danny Ponn
Bennett Environmental Inc.
1540 Cornwall Road, Suite 208
Oakville, Ontario L6J 7W5

Dear Mr. Ponn,

The minutes of the Public Information Seminar hosted by the Temiskaming Federation of Agriculture on January 5, 2002 regarding your proposed high temperature thermal oxidizer are enclosed for your review as well as the Executive Summary, the TFA position statement and Appendices A to D.

If you have any questions or comments please feel free to contact me at 705 544 7451.

Yours truly,

John Vanthof
President Temiskaming Federation of Agriculture

cc. Ariane Heisey, Ministry of Environment
Terry Graves, Public Concern Temiskaming
Louis Ethier, Temiskaming Dairy Producer Committee
Jack Wilkinson Ontario Federation of Agriculture
Dan Tasse Ministry of Agriculture and Rural Affairs
David Ramsay MPP
Ben Serre MP
Ministry of Northern Development and Mines
Town of Kirkland Lake
file.

Information Seminar Document For:

Bennett Environmental Inc.
Proposed Thermal Oxidizer
Kirkland Lake, Ontario

Prepared by:
Temiskaming Federation of Agriculture
RR 1 Englehart, Ontario
P0J 1H0

John Vanthof President
Dianne Mitchell Secretary

January 20, 2002

Temiskaming Federation of Agriculture

Public Information Seminar
Bennett Environmental Inc. Proposed Thermal Oxidizer
Main Auditorium, Northern College,
Kirkland Lake, Ontario
January 5, 2002

Table of Contents

`January 20, 2002

Executive Summary Public Information Seminar
Bennett Environmental Inc. Proposal for a Thermal Oxidizer in Kirkland Lake, Ont.

Introduction

The Temisakming Federation of Agriculture (TFA) is an affiliate of the Ontario Federation of Agriculture. The TFA represents 400 farm business members. Our mandate is to represent the interests of agriculture in dealing with other organizations, industries and all levels of government.

Our involvement and participation within the EA process regarding this application is outlined in Appendix B. The Temiskaming Federation of Agriculture hosted this seminar because we felt that there was a potential lack of objectivity in the public consultation process. This is due to the fact that the only consultants that the public have access to are employed by the proponent.

The format of the seminar consisted of presentations by an expert panel which included representatives from Bennett Environmental Inc. This was followed by an open question period and brief closing statements by the panel members. An agenda and speakers list is attached as Appendix C.

The entire seminar was taped. These recordings are included as Appendix D. The printed minutes were taken verbatim from the question period portion of the seminar.

We estimate that 150 people attended the seminar.

Issues and Concerns identified at the seminar or raised as a result of the seminar.

All parties involved agreed that hazardous waste sites especially those containing PCBs should be remediated.

The issues that were not resolved or adequately addressed include:

A Planning and Land Use

1) What is the rationale for locating the proposed facility in a populated area considering that there will be uncontrolled releases of contaminants during upset conditions? (minutes page 36, 63,64)

2) What is the rationale for the location of the proposed facility considering the location of the main markets and the location of sites approved to accept heavy metals which this facility cannot treat? (minutes pages 6 - 10, 76, 77, 39 - 41)

3) Could the proposed facility hinder the present land use and future development of existing industries eg. agriculture or mining? (appendix A)

4) Could the proposed facility be hindered by the present land use and future development of existing industries?

B Environmental Assessment Process

1) Is this proposal going through a Full Environmental Assessment? (minutes page 34, 54)

2) Two conditions that have to be met in a Full Environmental Assessment are the review of alternatives to the undertaking and the review of alternatives to conducting the undertaking. Were these studies completed? (minutes page 54) It should be noted that Dr. Mill's presentation and comments during the meeting were based almost exclusively on the effectiveness of a mobile PCB incinerator. (Tape 1 Side A&B, minutes pages 25, 26, 71,72)

C Baseline Testing, Long Term Monitoring, Verification of Data

1) Has baseline testing been conducted using animal tissue samples, soil samples etc to determine actual background conditions in this area? (appendix A page 2, minutes page 15)

2) Assumptive exposure ratios from ecological risk assessment show unacceptable build up of contaminants in the natural environment. Should background conditions be confirmed before risk assessment modelling is done? (minutes pages 14 -16)

3) Why does BEI not use data from it's facility in St. Armbroise for contaminant loading in the background conditions rather than making assumptions from reference data collected around the Great Lakes? (minutes page 17)

4) Was actual baseline data collected at BEI's four year old facility in St. Armbroise? (minutes page 17, 36)

5) Elevated levels of heavy metals and dioxins are being detected around BEI's St. Armbroise facility by the Quebec Ministry of Health. Due to lack of baseline data, confirming the Bennett facility as the source is impossible at this point. Why did the company not implement a base line monitoring and verification program? (minutes pages 36, 37, 42 - 48)

6) Do other facilities of this type perform baseline testing on animal tissue etc? (minutes pages 24 -27)

7) Is it possible for simple monitoring of air and soil to detect biomagnification that occurs in the

food chain? (minutes page 27)

8) Other point source contributors were mentioned in the documentation but they were not included in the air modelling. Why not? (appendix A page 3, minutes pages 50 -54)

9) Given that definitive conclusions have been drawn based on assumptions, and given that EA approval could be granted based on these conclusions, is it possible for a proponent to design and conduct an objective baseline monitoring and verification program? (minutes pages 15, 36, 37, 42 - 48)

D Liability Issues

1) Who assumes liability if secondary agricultural products like milk or meat are unable to be marketed due to a real or perceived threat from facility? (minutes pages 10, 11)

2) Would local homeowners be reimbursed or relocated if their property values were affected by the project? (minutes pages 80 - 82)

E Design and Operations

1) Does the design of this project make it safer than other presently operating facilities? (minutes pages 28 -32)

2) Does test burn data reflect actual operating conditions? (minutes pages 48 -50, 59 -62)

3) How many upset conditions have occurred at the St. Armbroise facility? (minutes page 70)

4) How many upset conditions are predicted to occur in Kirkland Lake? (minutes page 71, 78)

5) Is this a state of the art facility? (Dr. Carmen's presentation, tape 1 side B, tape 2 side A)

F Health and Social Issues

1) Will residents be warned when upset conditions occur at the proposed facility? (minutes pages 36, 63, 64, 75, 78, 79)

January 20, 2002

Temiskaming Federation of Agriculture

Position on Bennett Environmental Inc. Proposed Thermal Oxidizer

The agricultural industry in Temiskaming contributes one hundred million dollars annually to the local economy. Two thousand jobs in the district are directly related to agriculture. Unlike the rest of the province, both farm size and farm numbers are increasing. Milk production is the base on which our agricultural infrastructure is built. It has taken four generations to build some of the most progressive family dairy farms in the country.

The dairy industry is committed to providing traceability of its' products from the dinner table back to the farm of origin. With traceability comes accountability. We are responsible for not only our own industry but we are also liable for other industries who could impact our product or our ability to market that product. As our farms pass to following generations, these liabilities will also be passed on.

Based on our review of the draft EA documents and the unresolved issues stemming from the January 5 information seminar, we are gravely concerned that Bennett's proposal has the potential to become a major liability for agriculture in Temiskaming.

As of January 20, 2002, the Board of Directors of the Temiskaming Federation of Agriculture recommends that the Bennett Environmental Application for a Thermal Oxidizer be subjected to a Full Environmental Assessment including an unbiased peer review by the Environmental Assessment Review Board in a hearing forum.

Minutes
Public Information Seminar
Proposed Thermal Oxidizer
January 5, 2002
Main Auditorium, Northern College
Kirkland Lake, Ontario

Call to order, welcome, outline of procedures, etc.

The meeting was called to order at 10:30 a.m.

The audience was welcomed to the public information seminar on Bennett Environmental Inc. proposed hazardous waste impacted materials incineration facility.

Darlene Bowen introduced herself as the Chairperson for today's proceedings and gave the following history of working for the Ontario Federation of Agriculture as the Member Services Representative for the Northeastern Region.

Darlene acknowledged that Northern College had graciously allowed us the use their facility to hold this information meeting and thanked them for this consideration.

Darlene acknowledged that this meeting had been organized by the Temiskaming Federation of Agriculture but the discussion topics are not limited to agriculture. Awareness of the pros and cons of a hazardous waste incinerator is the main priority of this gathering and it is hoped that everyone will leave here today with a better understanding of this facility.

At this point the Chairperson presented a brief overview of the day's activities. Stating that we will start with a panel discussion and each member of the panel will have 30 minutes to make their presentation. The presentations will take until 12:30 p.m. and then we will break for lunch. We will resume at 1:45 p.m. and at that time there will be a 15 minute presentation by the Temiskaming Federation of Agriculture. After the presentation there will be a question period for the remainder of the meeting. Questions will be answered by the four panelists and any agriculture related questions that the panel can not answer will be directed to John Vanthof, President of the Temiskaming Federation of Agriculture. The Chairperson indicated that the panelists have assured her they will answer all questions to the best of their knowledge and I will not ask the panel members to answer abusive or disruptive questions.

All interested parties are invited to join in this discussion through the question period. This is our opportunity to access and to understand the facts.

Minutes of this meeting will be taken and submitted to the Ministry of the Environment as part of the Temiskaming Federation of Agriculture's report on the Bennett Proposal. This meeting is being tape recorded so that the minutes will be accurate. The tape will also be part of the Bennett Proposal submission. Copies of the minutes and written presentations can be obtained from the Secretary of the TFA, Dianne Mitchell.

At this point in the meeting the four panelists were introduced by name. The first panelist introduced was Dr. William Mills, principle associate of Mills Consulting Incorporated. Next is Mr. Danny Ponn, Vice-President and Chief Operating Officer of Bennett Environmental. Then, Dr. Neil Carmen and Dr. Paul Connett both here on behalf of Public Concern Temiskaming were introduced.

The question period will follow lunch and run until approximately 4:00 p.m. and at that time each panelist will have and an opportunity for a short summation and the meeting will adjourn at 4:30.

Mr. Danny Ponn was introduced at the first presenter. He is the lead contact for this proposal. He is a professional engineer and is currently Vice President and Chief Operating Officer for Bennett Environmental Inc.

Mr. Ponn's presentation can be found on Tape #1, side A.

At this point the Chairperson thanked Mr. Ponn for his presentation and introduced Dr. William Mills, the principle shareholder in Mills Consulting Inc. He hails from Arnprior. He is formally employed by Environment Canada and the Ministry of the Environment, as a provincial officer. He has worked for several consulting firms.

Dr. William Mills' presentation can be found on Tape #1, side A & B.

The Chairperson thanked Mr. Mills for his presentation and introduced the first speaker from Public Concern Temiskaming Dr. Neil Carmen. He was Chief of the Regional Stack Sampling Team testing air emissions at industrial plants for the Texas Air Control Board from 1980 to 1992. He is currently employed by the Sierra Club, Lone Star Chapter.

Dr. Carmen's presentation can be found on Tape #1, side B and continues on Tape #2, side A.

The Chairperson thanked Dr. Carmen and introduced Dr. Paul Connett, also from Public Concern Temiskaming. He is a Professor of Chemistry at St. Lawrence University in New York. For the past 14 years he has been researching the issue of waste management with a particular interest in dioxins.

Dr. Connett's presentation can be found on Tape # 2, side A.

At this point the Chairperson thanked Dr. Connett for his presentation and the meeting adjourned for lunch at 12:30 p.m.

The meeting reconvened at 1:45 p.m.

The Chairperson introduced the first speaker of the afternoon, Mr. John Vanthof a local dairy farmer. He has been a Director of the TFA since 1992 and is currently President of this organization. He is an elected member of the Temiskaming Dairy Producers committee and is currently serving his third term as a councilor for the Township of Evanturel.

Mr. Vanthof's presentation can be found on Tape #2, side B.

The Chairperson thank Mr. Vanthof for his presentation and announced that there would be a change in the schedule. Earlier presentators discussed the issue of human health and public studies and because this is an open forum we asked Bob Willis to come forward and speak. Mr. Willis is the Chairperson of Cantox and Cantox does human health and public studies for government, communities and for the private sector. They are a national company with 3 office in Halifax, Mississauga and Calgary.

Mr. Willis' presentation can be found on Tape #2, side B.

The Chairperson thanked Mr. Willis for his presentation.

At this time the Chairperson outlined the procedure for the question period.

The following question period is transcribed from Tape #2, side B through to Tape #4.

At this point a member of the audience delivered a document to Mr. Ponn.

Chairperson: Excuse me, can you please state your name please.

Mr. Terry Graves, Public Concern Temiskaming.

Chairperson: Thank you.

Mr. Graves: (due to technical difficulties it is not possible to transcribe much of what is said) ... The document indicates bank loans and long term debts of Bennett one of which is a IT Corp loan for $3,064,111. We talked about this at the Englehart open house, if you recall, and at that time you told me that was actually for a (unable to understand) in exchange for this New Jersery Corporation bringing 20 - 30 thousand tons per year of contaminated soil from New Jersey to Kirkland Lake. Is that correct?

Mr. Ponn: The IT loan is basically a business deal where Bennett bought IT equipment and it is not specific to Kirkland Lake but it is a body of equipment that they have and it is a way of taking them out of the soil business in the US because they wish to exit that market.

Mr. Graves: Yes, and my actual point has nothing to do with the loan except in the ancillary that in exchange you are responsible for taking 20 - 30 thousand tons of PCB contaminated soil or other contaminated soils from IT Corporation in New Jersery and bringing it to Kirkland Lake to incinerate. That is what you told me at the time in any case.

Mr. Ponn: I don't recall that exact answer but let me be clear. The facility in St. Ambroise, Quebec can handle that volume of soil so it is not necessary that soil comes to Kirkland Lake. It's just that it is a business deal where we buy their equipment because they want to exit that business and in exchange they guarantee or promise to deliver soil because they are in the site clean-up business in the US.

Mr. Graves: I believe the way you phrased it with me is that you have committed to them that you will take 20 - 30 thousand tons and that is part of the business deal so called as well.

Mr. Ponn: The business deal has some minimum volume, I believe of 20 thousand up to 30 thousand tons per year.

The Chairperson thanked Mr. Ponn and asked for the next question.

My name is Alex Melaschenko, I'm a resident of Haileybury, this is my first meeting here, I just came to be informed. My question is to you Mr. Ponn. Considering that most of the contaminated earth comes from industrial areas, right, am I right?

Mr. Ponn: Yes, that is correct.

Mr. Melaschenko: Why would you not locate your plant within proximity of that as opposed to having to pay for all that trucking. That's one and the other question is when you had on your map where the contaminated earth might come from would that also include contaminated earth from Japan, lets say, from Army bases in Japan.

Mr. Ponn: Let me answer your second question first if you don't mind. Our terms of reference in our EA strictly states that we will take or we will propose to take soil from NAFTA signatory countries that's basically US, Canada and Mexico but the market dictates that the Mexican market is not there so it is mainly the US and Canada that we will be taking soil from. Bringing material from outside using other means than trucking or train or intra-model would be prohibitively difficult so it's not conceivable that we will be taking soil from Japan, we did not apply to have soil coming from Japan or any other country other than North America

Mr. Melaschenko: And under the world trade organization it doesn't change?

Mr. Ponn: No, because we don't see a market there.

Mr. Melaschenko: And the answer to the first part?

Mr. Ponn: In your first question, the bringing soil in from different parts of the country, because we're proposing to have a fixed facility because we believe that fixed facilities are better than mobile facilities in terms of it's infrastructure.

Mr. Melaschenko: I meant why didn't you have your fixed facility within proximity, lets say of industrialized areas, Hamilton, Toronto.

Mr. Ponn: If you can see the map or refer you to the map that 1,000 mile radius is what we consider proximity because that is the trucking radius that is economical.

Mr. Melaschenko: I don't quite get that. How much contaminated soil would you get from this area as opposed to southern Ontario?

Mr. Ponn: Let me give you an example. This year we took close to 6,000 tons from Fort Albany which is even North of here. We also have taken soil from Smooth Rock Falls and all along highway 11 corridor. There is also the (unable to understand word) mine radar sites that are contaminated with material and other sites from the North as well and they contain a sizeable number of tons of contaminated soil.

Mr. Melaschenko: I understand that but most of the contaminated soil would still come from the areas that I mentioned. Am I right or wrong?

Mr. Ponn: I can't predict that because the market happens when it happens. We sign the contacts as they come.

Dr. Connett: Madam Chairperson, may I also respond to that question? I think a more direct and simple answer to your question is that they wouldn't be able to build this facility, locate this facility in the area of Toronto.

Mr. Melaschenko: That is exactly what I am inferring.

Matt Duke, Temiskaming area farmer, I too would like to thank Mr. Ponn and of course the other people on the other side of the coin for coming up here. From a logistic standpoint, with reference to what the gentleman spoke about previous to me. The further away you bring product from its source the more costly it becomes. And exactly with what was just stated that chances are public perception and a lot of what this is going to be about in the future is going to be about public perception whether the fact comes through or not, it's going to be we don't want this in our backyard and we have to plead with the people of this town that hopefully they don't want it in their backyard as well. But what I wanted to ask you for more clarification is what I submitted in the draft terms of reference, also was made reference to by Dr. Connett. With respect to the PCB tanked container of pork that came out of Belgium in the year 2000. He made

reference and the word he used was economic impact when that container of probably no more than 600 carcases of hogs was railed. That had a major economical impact to the country of Belgium in the fact that they were no longer allowed to export pork product until the source was uncovered and the preventative measures were put in place to ensure that would never happen again under the HACLP rules and the food safety rules. The thing that I would like to impress upon you Mr. Ponn and perhaps get more clarity from you is who is liable? In 2001 Canada became the worlds largest exporter of pork products, it exports now more than the United Sates over 70% of what we produce is in export. The liability and the financial impact of a potential problem down the road is no longer a regional issue which we could say is Kirkland Lake it becomes a national issue and who is liable to recuperate and to help recover the loss in equity and cash when a nation's pork production, or meat production or milk production facility is closed as a result of PCB contaminates in food stuffs.

Mr. Ponn: The answer from my point of view I think that question is beyond the scope of this exercise. The terms of reference that were approved by the Ministry focuses the study very narrowly and does not cover that. I'm sorry but that is the way it is.

Dr. Connett: I'd like to respond to that because I had the experience of helping a community in New Zealand and they were concerned about an incinerator which was proposed right in the middle of their dairy country and I had the opportunity to speak to the person from McDonalds that purchased beef for McDonalds for Asia, a resident in New Zealand and when he heard that was the proposal I mean the guy just sort of

leapt about 3 feet into the air because he recognized immediately that this is not simply a reality issue, its not just a question of well once they have built it we'll go and make measurements to see if it is okay. What you've got is the middle man have the power to short circuit their whole approach they can just simply say we will not purchase near an incinerator. He recognized that immediately and before I knew what was happening I was being wheeled out, I was talking to the agriculture correspondence, to the editors of the agriculture newspapers and within a relatively short time that incinerator proposal was killed. And really, it didn't make any difference whether it was good or its bad, whether the dioxin emissions were low or high it was the simplest way for them to kill this in the bud. So, and I'm not sure that's sort of indirect answer to your questions but I just want underline that it isn't just a real reality issue, it isn't just a question of whether or not your lucky enough to keep the levels of dioxin in your beef or your pork, or your chickens down to a certain amount it's if the issue becomes alive in Canada, if the public catches up with the fact that there is too much dioxin in our food and there is too much dioxin in our babies they will then demand we want food without dioxin and that's when the middle man will take the short cuts and innocent people will get hurt, just as in the United States. I'm don't know if you remember this but we had the Alar apple scare and the result of that is that many farmers who sold apples that never used Alar in their whole lives were hurt because the people just didn't buy apples from New York State or Washington State or wherever these apples were being produced. And I think anybody that knows anything about

agriculture will understand what I'm saying here, you have got to be worried about perception.

Mr. Willis: A couple of things that are related to several of the questions that have come up. First of all facilities not exactly like this one but very similar have been approved in southern Ontario, there is three of them that I can think of and I can give you the details on them if you want, over the last five years so I don't think it is impossible to get something like this approved down there. The second thing is, and I think we have to be very careful with this, and I think publicizing this the way Dr. Connett does is contributing to this problem. There is already dioxin and furans in all your beef and dairy products, your chickens and everything its ubiquitous and Dr. Mills gave you an idea where it is coming from and how it gets there. This facility, based on all the information that we've got is not going to add significantly to that background at all. The sources for that, we know what they are, that in fact every year the percent contribution from different sources is decreasing because more sources are being found. It is coming from the steel industry, it's coming from the smelting industry, it's coming from anybody or anything that burns petroleum hydrocarbons. The new studies the EPA have out now show that there is enough chlorine in your air, natural background, to produce significant quantities of dioxin and furans if you burn anything without a proper combustion system on it. That includes your automobile, your house, your cigarettes you smoke, everything, so we have to be very careful about this. This is a ubiquitous

problem that has surfaced and its coming out of everything we use in modern society and you can't point your finger at one thing. This proposal is aimed at getting rid of many of the substances that are contributing to that load, and I think that is going to help in the long run.

My name is Stan Gorzalczynski and I'm a resident of Haileybury. My question is directed at Mr. Ponn and before I ask this question I would like to thank you for subjecting yourself to our questions, it says a bit about Bennett Environmental. My question is actually two tiered and you may want to get a hand from Mr. Willis. Is it? Your ecological risk assessment Appendix M, the executive summary, there is a paragraph in the conclusions, that paragraph states that ecological risk assessment modeling indicates that exposure ratios for certain species are in accedence of one and thus unacceptable risk is confirmed for the operating life of the BEI Facility. Cantox, which is your environmental risk assessment consultant strongly recommends that BEI verify existing contaminate concentrations in the soil, water, sediment and animal tissue for the immediate study area prior to proceeding with their proposal. I'm reading this verbatim. My question to you Mr. Ponn is in your presentation this morning you ignored that completely. I'd like to know, first of all, what are you planning to do to address that issue and secondly, why did you basically mislead this audience this morning?

Mr. Ponn: Let me just answer that quickly and hand the mike of to Bob Willis. The basis of that report or that paragraph is based on the fact that there isn't a stack of data that we can go back to as background document. So what they did there was,

correct me if I am wrong, is that they took the most likely contamination level, lets say in the fish, and they used data from the Great Lakes or some other place like that and just build it up from there and there was an accedence so the recommendation there was that if the EA is approved and Bennett is given the go ahead with building this facility we would need, I believe, four seasons worth of sampling where the fish tissues will be collected and there assumptions to be verified at that point.

Mr. Gorzalczynski: May I interrupt you there. I'm reading verbatim prior to the proceeding with their proposal, prior to proceeding with their proposal is not after the MOE has given you a C of A.

Mr. Ponn: The EA and the C of A has to be differentiated here because the EA basically looks at all the peripherals to a C of A, like the social issues and so on. The C of A looks at all the technical aspects of the operation such as what temperature, what residence time and so on. So the EA would be approved first and the C of A would be approved next and in between those two there will be some, I would say, heavy duty sampling because at this point in time its not warranted for Bennett to spend the money and collect fish tissue samples when the EA is not certain.

Mr. Gorzalczynski: You haven't answered the second part of my question. Why did you not include that in your presentation this morning? Why did you tell the people in this audience that the ecological risk assessment did not show any areas of concern when your consultant actually pointed out a very clear concern?

Mr. Ponn: Can I get back to that, let Bob answer the question first.

Mr. Willis: I'll give it back to him in a moment, there is a very important point that is being missed. The accedences we are seeing are based on the assumptions we have made on what the background levels are for these substances in the eco system now and the point Mr. Ponn made is that we don't have enough data from the local area so we have to make some extrapolations from fish concentrations elsewhere and in order to determine whether that is actually correct we need to do local sampling to get the data. The study does say that there is no predicted impacts from the facility itself that the impacts already exist from background. Does that help clarify it?

Mr. Gorzalczynski: At the risk of hogging the microphone here, I understand what you are saying, I'm not convinced that assumptions are needed at this point. Human health, I look at human health risk and ecological risk as almost being one. How would I vocalize this? If you make a statement like you have done here and we are going to an EA which supposedly verifies all the

negative impacts on the environment before you proceed, what would happen if you did background data and you found that nothing has changed, you still had an accedence in your exposure risk ratio? Would you pack up and leave or would you just ignore that like you presumably did this morning?

Mr. Ponn: I did not ignore that statement. What I am saying is exactly what Bob was saying is that the incremental impact from this facility would not create a significant impact on the environment. Now, if the fish tissue came out that is significantly impacted that any additional impact to that, then we would seriously have to look at that and that is a thing for the Ministry to decide on whether we should pack up our tent and leave or is there any mitigation measures that can be put in place at that point in time.

Dr. Connett: Can I respond to that to please. What I find intriguing about this is having to go to fish in the Great Lakes when this company has been operating a facility in Quebec. Why don't we have levels of dioxin in fish near that facility? Why don't we have levels of dioxin in cows milk from near that facility? Why aren't we using real data from a real machine that was built by the same company? Why are we having to do extrapolations? This does not give me any confidence that this company is going to do much once it gets it's permit. I think this is the kind of things that Neil was

talking about and I'd like to tack onto that a response to what Dr. Willis said which suggested I think, if I translated, that I'm being alarmist. That I am suggesting to you that incineration is contributing to dioxin to the food chain when in fact there are many other sources. Now I've been doing this for seventeen years and I told you that in 1986 our estimates showed that the food chains dwarfed exposure through inhalation. We showed that a quart of cows milk was equivalent to eight months of breathing at the same point as the cow but in terms of being alarmist the consultants who were present at that meeting, the people who were doing risk assessments and only using inhalation jumped up at that symposium in Japan and said I was being premature, that this needs to be looked at, etc, etc. So they wanted to put me down, put us down in 1986. Now, should people have dismissed me as an alarmist because in 1989, three years later, the Dutch government found exactly what we were talking about. That the levels of dioxin in cows milk 1km from the Rotterdam incinerator had these very high levels and that was three years later and then thirteen years later, sorry twelve years later, the French find the same thing. Then in 1994 which is eight years later when consultants did a risk assessment for the Columbus, Ohio incinerator that was putting up nearly 1,000 grams of dioxin, actually the Ohio EPA, they only looked at the inhalation route. So I think the point is while we have been saying this consistently since 1986 and we have been ignored by critical people, we've been ignored by governments, we've been

ignored by consultants. Yes they have gradually done things to do what we were suggesting 15 year ago, they are now doing those things. But it wasn't willingly. I would also point out the other thing we were saying is, you know what you do when you do a risk assessment for these facilities is you look at the maximum point of impact and what we say is you are missing the point, you are missing the point. What you really should be doing is estimating how much dioxin comes out of that stack and how much is it going to be captured by agriculture, by food anywhere. It doesn't matter if it is 10 km away, 20, 30, 50 km away. This whole discussion pivoted around maximum point of impact. It looks conservative. They make it look extremely conservative but it is not conservative because what we should be looking at is the cumulative load, we should be considering the impacts of all facilities. So when the EPA in 1994 eventually came around and said look here is the levels of dioxin in the food chains and we are over the limits if we consume that food number 1. Number 2, now lets work out where it is coming from. It's coming from combustion. It's coming from municipal waste combustion, hospital waste combustion, hazardous waste combustion, etc, and incidently they put very low on the inventory some of the things that Dr. Willis is saying now. So I don't think I'm being alarmist. I think what I'm trying to say to you is that we made these warnings in 1986 and some people have listened to us and some people have ignored us but I don't think you can charge us

with being alarmist at all.

Mr. Willis: (First part of comment not recorded because the tape was being changed) ... it puts steel right at the top of the list today. So you are a little out of date. Secondly, food chain analysis has been done on dioxins and furans since 1984. We did an assessment on an incinerator in Toronto which was closed by the way because of the assessment that we did and we looked at complete food chain update for everything that was available at that time. We didn't have agriculture because there is no agriculture in Toronto. So, I don't want to belittle it but I think it is very important. Food is the route. Air is relatively minor but the sources for the food come from the air. With a deposition just like Dr. Connett has described and so I don't think, I'm not saying your being alarmist what I am saying is that these things have to be taken in perspective and you have to look at the total sources. And we have to figure out as a society how do we reduce the concentrations of these substances in the environment totally. And focusing on one facility or another doesn't answer the question.

Dr. Connett: Again, I have to come back here because you slipped straight into it. Right, you slipped straight into it. There is no agriculture in Toronto, that is precisely the tactic and strategy that I'm warning against. There may not be agriculture in the city of Toronto, but there's certainly agriculture within

50 km, 30 km, 20 km of Toronto and that was not assessed by you, from what you've just said. And incidently if we go to a more recent assessment that you did for Cornwall you made the same mistake again. In Cornwall, you only looked, in your first risk assessment, you only looked at exposure to vegetables grown in people's backyards and the argument that you used is that there was no agriculture at the maximum point of impact. I had driven around the area and I found dairy farms within a kilometer, 2 kilometers of your facility. And indeed they weren't at the maximum point of impact. And based upon my commentary, at that time, you went back and did do the risk assessment now for what you should have done in the first place which was the exposure to the dairy cattle. And I believe the number is, and you can correct me, but I think the number you came back with was then about 3,000 times higher than the dose that you represented in the first place because you made the same mistake again of concentrating on the maximum point of impact instead of considering, I wouldn't say long distance transport but relatively long distance transport to the nearest agriculture.

Dr. Willis: I don't want to go into a lot of detail about why we did that but what did the result show when we corrected it?

Dr. Connett: Well, okay.

Dr. Willis: What did the result show when we corrected it?

Dr. Connett: What the results showed was that there is no end to your ability to play with smoke and mirrors and I will explain that to the audience. Now, when they finally got the dose from these calculations they compared they compared it to the regulatory dose. Now I want the audience to understand this, cause it can get a little complicated so let me be very clear. Supposing, lets convert this to a bridge and engineers have determined that the safety limit for this bridge is 10 cars, okay. Now you're proposing something which is going to increase the traffic and you find out that there is one extra car that is going to cross this bridge. Now, I think I'm not doing you a disservice Dr. Willis but your approach was to say, look one car is one tenth of the standard and therefore everything is honky-doory and my approach was but you haven't considered the background level. You should be adding this increment to the background exposure and then comparing that to the regulatory level and I said this is like having, if you like, nine cars on the bridge already, now you add one car and you've got ten cars on the bridge and it is no longer, its not safe, you shouldn't do it. So here we've got the same story, we've done the calculations, we've got an extra increment of one car, Dr. Willis' approach is to say one car is nothing because the standard is ten. My approach is to say lets estimate the background level and lets say its nine cars and you add one car to nine

cars and now it is not safe. And the simple thing is to say is that they did not use background levels even though they were dealing with a highly contaminated Cornwall area. They made no attempt to find out what the current exposure to PCBs was in that population even though some of them were eating fish with PCBs in it from the St. Lawrence river. Even though they were downstream of industry that was producing dioxins. No, none of that was done.

Dr. Willis: Your amazing. I find this absolutely amazing because we did a background assessment on that study, we did a background assessment on this study, we did it before Dr. Connett came on the scene, we always do a background assessment and if you're a chemist you know why you do a background assessment that's because there are hundreds of assumptions made in this thing just like there is in a chemical analysis and the only way you can get a reasonable estimate of what is happening is to compare your background with something that you've got measured.

Dr. Connett: Well, if your background analysis is what you were saying then these people should be warned, you did not calculate a background dose for somebody living in Cornwall, you did not calculate a background dose, what you did was to look

At this point there was disruption from the audience and the Chairperson moved on to the next question.

Gilles Bisson, MPP for Timmins/James Bay and I am also a concern citizen and a resident of Northern Ontario and I was a bit troubled by what you talked about when you said we shouldn't worry too much because much of what pollutants out there now. When it comes to dioxin are not just caused by plants such as what is proposed but what is in the atmosphere because of what is already happening out there. And it reminds me of what exactly happened to us in mining back in the 1970s and 80s when we assumed the reason many men were dying underground from cancer was because of what they were exposed to underground the same type of specialists the same type of government officials came in and said its lifestyle, it raydon in the basement, they smoke too much it is everything else but what they are exposed to at work. It took 10 years and a whole bunch more deaths to finally get it right that people were dying underground because of what they were exposed to. So my question is this, the Federation of Agriculture, the OFA made a good presentation when they talked about the need for baseline studies and to me it makes some sense that if you can take a picture of what's going on now in an area when they first try to start up one of these plants and then look at what's happened over a period of lets say 5, 10, 15 or 20 years as to what pollutants got into the environment when it comes to cows, the milk, the beef, etc, etc, it would at least give us an idea of what you could expect with a plant if it was build here. So my question is has there been a baseline study done somewhere else where one of these plants was established 5, 10, 15, 20 years ago and what have those baseline studies told us over the longer term?

Dr. Mills: I'd like to, I have been keeping quiet so I'd like to take my special card for this one. First of all, we have, certainly on Smithville, certainly on Goosebay every project I have been involved with we have done background both monitoring to get the data ...

Mr. Bisson: Taking blood from the animals, taking soil samples, milk samples.

Dr. Mills: We've taken all, I've spent many a day out in (unable to hear as Mr. Bisson was speaking at the same time) ...

Mr. Bisson: Can we get those reports?

Dr. Mills: Yes, I can, if you at the end of it I'd can give you my card and tell you where you can get them, they are all publicly available, I think. I would say that in some cases we weren't able to catch as many animals and that as we would have liked to have got but what I am trying to say is that we did have monitoring. At Smithville we had a problem. We could see it. There is a halo around that site in soil and we were seeing elevated PCB concentrations 10 to 100 times higher than what I showed you here in the ambient air and much higher in the summer and that. And we've got the data clearly showing the different remediation steps that we took on that site and by incinerating the material we went to background there is zero impact. So these types of site, now people say that didn't operate 15 to 20 years,

the Smithville cleanup started in 1985 and the sampling went on, regarding the incineration, until 1993. So there is at least 8 years of data on that site where you can see a discernable reduction in the biota and in the, there are no real fish near there it's about 20 km from the Great Lakes but we definitely saw a reduction in the areas surrounding it. The halo is not there now. You can go there, there was, during that time period there was a house there 350 meters away, the school 650 meters away, there was a grainery 700 meters away and their exposure has been significantly reduced by cleaning it up. I guess that is my concern. The answer to the bigger picture which is the background exposure we have today is not to do nothing, whether it is incineration we need to destroy those contaminated soils. So no matter what people walk away with and what your opinion is on destruction technology, which one is better, please don't go away thinking that the answer is to do nothing. We are all being exposed right now. We are seeing elevated levels in the Canadian Arctic that can only be getting there, we believe, by atmospheric transport. So we need to get the source of this, which we believe and a lot of the data shows, is contaminated soils.

Dr. Connett: Respectfully, I think there are two larger questions. One question is there is a need to clean up the PCB, I agree, should it be done with incineration, should it be done with alternatives, should it be done in Kirkland Lake and who decides whether it be done in Kirkland Lake? I think these are larger questions from what you said. May I ask you some direct questions here? In your monitoring did you monitor the levels of dioxin in cows milk?

Dr. Mills: The technical answer right now is I don't recall 100%. I believe we have data from that if I can not give that to you right today.

Dr. Connett: Did you measure it in beef?

Dr. Mills: Again, I think we had dairy, beef, we did not do fish near there, we got chicken eggs, cause we did chicken eggs I believe. Like I said, just for the air, soil, water we had over 14,000 samples plus we had separately at least 50 to 100 biota samples that were done before and after and that also included animals. I can't exactly remember which ones.

Dr. Connett: Because this is extremely important in Oroville, California there was an accident and when the Californian authorities, the Department of Health, measured the levels of dioxin in the soil they declared there was no problem, when they measured the dioxin level in chicken eggs they discovered that one egg, just simply one egg, would take a consumer over the acceptable level. So you can miss the point with air samples and soil samples, and the beauty of doing cows milk is that you know that cow is scavenging over 60 square meters and it isn't just doing it for one day it's doing it for months. That's the data that you really want.

At this point the audience member asking the question did not have a mike and I'm unable to transcribe.

Virginia Prentice: My first question is to Dr. Neil Carmen. In most of your discussion you talked about your experiences with monitoring stack emissions back in the early 80s and a major problem with that being a lot of shafty business and things not being done properly because of bad regulations, bad government monitoring and such like that and then in the end of your presentation you praised government and the EPA for their discovery of non-incineration methods for destruction of PCBs so I found that a little imbalanced. But your discussion you had a, main concern was your discussion for potential of fugitive emission leaks from untreated materials and you did agree, that you know, the contaminated soil areas are much more higher concentration of emissions than what would come out of a stack emission after the soil was treated. Do you agree? Just yes or no.

Dr. Carmen: Well it depends, it depends. There's fugitive ...

Virginia Prentice: No, I'm just saying like ...

At this point the Chairperson requested that the audience member ask their question.

Virginia Prentice: Okay, so. I understand, in my understanding, fugitive emissions from a contaminated site are greater, just emitting into the air they create more pollution than after being treated and the potential emissions coming from a

stack under good operating conditions. My question is where do you see the fugitive emission coming from on the proposed Bennett facility?

Dr. Carmen: My comment about the fugitive emissions was not just with respect to what's coming out of the soil. Fugitives, specifically at the plant site, refer to various leaks in the whole system anywhere between your bringing it into the plant to the stack is a different, you know that's a point source, so you can have fugitive leaks at many, many points in the system. Those were the fugitives I was alluding to earlier not from the soil out at the site.

Virginia Prentice: I understand that but the soil at the site is also called fugitive emissions, is it not?

Dr. Carmen: Sure, that's certainly one place that you will get fugitive emissions. The volatilization that was alluded to earlier but you can have the whole, almost the, many, many parts of the incinerator train will have fugitive leaks. That's where you have seals in it, but you know if you go out there with a meter that has a detectable limit some of it may mean levels that are non-detectable. You can also have levels that are detectable. The point is you will have fugitive leaks of PCBs and other gases from that incinerator system.

Virginia Prentice: Under ideal operating conditions?

Dr. Carmen: Absolutely.

Virginia Prentice: Okay, that's your opinion.

Dr. Carmen: Now, you'll have pressure in the system, negative pressure, to minimize that but you know all these incinerators have kiln puffs, they have leaks, you know if you start really investigating you will find that fugitives, fugitives are one of the ways that incinerator workers get exposed, I mean its not so much what's coming out the stack, I think, for the workers but there's been a number of places where the workers have demonstrated elevated dioxin levels and also people in the community. Jacksonville, Arkansas is a very good example of where an incinerator at a dioxin site operated for less than two years and it was supposed to be state of the art, this was the early 90s and what happened was ...

Virginia Prentice: So I'm, at the proposed Bennett facility, are you aware of the facility, that it is totally enclosed, negative pressure. I just want to talk about the facility here in Kirkland Lake. I know what your getting at where these other places and these things happen I do understand that. But with regards to a rotary kiln incineration and what their process is and a totally

enclosed building, the negative pressure, are those things, they benefit or do they hamper fugitive emissions? Do they make them less or do they make them more? I only want to discuss what's going on in Kirkland Lake. This is where I live.

Dr. Carmen: Theoretically, I think that, I don't know what predication or calculation Bennett has used for the fugitive emission at the plant site in terms of the incinerator itself. I'm sure that there is some number that would be put in the permit that would be a maximum limit for the fugitives not counting the handling the soil before it goes into the incinerator. But, again, I would say that, that is somewhat of a theoretical number. You need to be out there measuring it and then you can have non-detectable levels at many points in the system, so, you know.

Virginia Prentice: So, basically, which is better, storing soil outside in piles or storing it inside a building?

Dr. Carmen: Well, I would use ...

Virginia Prentice: So, can you say that they are taking mitigating circumstances to prevent these things from happening by doing these things? By doing these things?

Dr. Carmen: Well, what you are doing is taking one set of problems and your trying to solve it with an incinerator that you hope and pray is going to work right. The fact is that they don't. There is many, many cases of very similar thermal oxidizers, maybe not identical to Bennett's but they are duel chambered systems and state of the art even in the last 10 years, and they have horrible problems.

Virginia Prentice: Okay, thank you. You've answered my question.

Dr. Carmen: And also you asked about my comment in terms of the EPA and alternative treatment technologies. My point was really that the US government is looking at non-incineration technologies for disposal of things like PCBs, dioxin, military weapons, in fact they're looking at, at least, six technologies. One failed, that was plasm ark destruction. Two technologies have passed and three more are going through demonstrations.

Dr. Mills: None of those are for soil though, lets be clear, non of those technologies that are being considered for the chemical weapons are being looked at in terms of their ability for soils.

Virginia Prentice: Thank you. My next question is to ...

At this point the Chairperson asked that this audience member ask only one more question directed to the Bennett side and then allow the other audience members to ask their questions.

Virginia Prentice: Dr. Mills, according to the MOE's metrologist's office in Timmins the predominant wind direction in this area is S to SE. With the agricultural area being 30 km south of us, does that, I know it doesn't bring any, does it make it any better than if the wind direction was N to NE?

Dr. Mills: There's two parts to that. First of all I think that it is important to do site specific metrology and in fact we found here that the wind direction is different, Danny, I just can't remember it's different than Timmins. Is it still S to SE?

Mr. Ponn: The air modeling export looked at data from the Timmins airport and they looked at data from the Earlton airport and his conclusion was that the data in Timmins represents Kirkland Lake better because there is no valley affect, where the Earlton airport has a valley effect and it is predominantly from the NW going to the SE where as Kirkland Lake is more dispersed, actually the wind roses has all points on the compass covered.

My name is Tom Wells, Mayer, Haileybury. I have a very quick question and I apologies for butting in but it is a very short question. We are very concerned in Haileybury that what is

achieved in your efforts to justify the Bennett proposal is a full environmental assessment. Could you tell me, simply yes or no, is what you are doing considered a full environmental assessment?

Mr. Ponn: I'm afraid, Tom, that there is no yes or no answer to that because the government broke up the environmental assessment into three pieces, if I'm not mistaken, and we are fitted into one of those three compartments. So as far as the Ministry of the Environment is concerned we are doing a full environmental assessment under that category.

Kathy Martin, Englehart. Mr. Willis, you talked about three similar facilities in southwestern Ontario that have been approved, people who know me know I'm a little research obsessive on primary sources, so could you tell the names of those three facilities and whether or not they're a proposal similar to this or whether they are garbage incineration or what exactly they are? So, the name and exactly what type of facility.

Dr. Willis: They are not exactly the same as this. One is a municipal waste incinerator that has been operating in Peel Region in Brampton for, I guess it's, nine years now. And the other is the MR ...

Kathy Martin: Is it municipal waste incineration?

Dr. Willis: Yes, it's just been expanded, and just had a certificate of approval for an

expansion, last year. And the other one is the MRR facility that we've heard about in Cornwall and then the third on is a ...

Kathy Martin: I'm sorry, is that municipal waste?

Dr. Willis: No, that's a combination it burns the odoring agents in natural gas and it burns PCB oils. And the other one is in Port Hope, Ontario, Stacey Metals it's called and it's a metal recycling facility where they burn transformer carcases after the oils have been drained out.

Dr. Connett: And I think that perhaps this is an appropriate time, with equal time arrangement for me to respond to the notion that there's no relevance to discussing MRR at the same time as your discussing Kirkland Lake. I think there is a lot of relevance. First of all it's the same consultants that are preparing the human health risk assessment so you need to know what kind of job they did on that. Secondly, you need to know the behaviour of the Ministry of the Environment. You need to know that they have approved, there, a facility to burn PCBs essentially up to 30 thousand parts per million or to put it their way 30 kilograms of PCBs per load. They didn't blink at that and they had agriculture, they had dairy farms 1 km away or about 1 or 2 km away short distance. So I think this underlines what I said at the beginning. Do not expect the bureaucracy to save you here. If they

are prepared to licence a facility which uses a box which was designed to recycle metals they permitted this to burn 30 kilograms a load. All they have is a wet scrub. They have agriculture 1 or 2 km away. The same consultants there said it was okay, it stands to reason that something where you've got the agriculture further away and they are burning 1/6 or 1/10 as much PCBs how could the Ministry of the Environment not approve it. So I think you should take very special attention to MRR.

My name is Martha McSherry and I'm a resident of Kirkland Lake. I have a couple part question for Mr. Ponn. Mr. Ponn you had spoke of 30 years experience, Bennett had in the waste industry?

Mr. Ponn: John Bennett has, yes, he is the founder of Bennett Environmental.

Martha McSherry: So that's a lot of years. Can you talk about the baseline testing that you did in St. Ambroise, PQ prior to the installation of that incinerator there?

Mr. Ponn: Okay, there was no baseline testing done at that time because the Ministry did not require that as condition of the permit.

Martha McSherry: And you didn't feel that, that would be prudent in order to measure down the road whether or not you were having impact on the environment.

Mr. Ponn: I have to admit that, that, was an oversight on our part because we were strictly following the requirements of the Ministry. We, at that point in time, did not take the pro-active approach and we've learned our lesson. I think that from here on in we will do the baselines and we are going to do the baselines.

Martha McSherry: It is very disappointing. The second part, you had mentioned that the Citizens Advisory Committee picked the site in Kirkland Lake for the incinerator.

Mr. Ponn Yes, that is correct.

Martha McSherry: Can you talk about the choice of sites they had to chose from?

Mr. Ponn: Okay, going back to I think late 1999 we approached the city and the city agreed to help us look for sites that are suitable for a facility like this in terms of acreage, services like natural gas, sewers and water and the necessary infrastructure. So the city recommended 8 possible sites and from those 8 possible sites the Citizens Advisory Committee debated the merits of each one and came up with this one on Archer Drive.

Martha McSherry: And am I correct to understand that each of those sites were all located within town limits?

Mr. Ponn: I believe that is correct.

Martha McSherry: Very limited choice, in my opinion. And I'm going on here a little bit, but, could you tell me if there is any possibility of a capability of burning the PCB oils or the liquid PCBs at your incinerator down the road if you were to homogenize, mix it in with the other stuff.

Mr. Ponn: The design of this facility strictly handles solids because we are not going to put in liquid systems such as tanks and transfers and so on. So, from design it is only going to handle solids. Keep in mind that the liquid market is diminishing, there is not that much volume of liquids in Canada. The Swan Hills facility is taking care of the majority of the liquids in Canada.

Martha McSherry: And one other part. There is supposedly residuals that you had mentioned coming from this burning and they are loaded with heavy metals. Was I correct in understanding you to say that?

Mr. Ponn: The process we are proposing does not handle or remove heavy metals from the soil. What comes in goes back out.

Martha McSherry: And, so these heavy metals you had suggested that they would be then dumped where?

Mr. Ponn: We have to look at the levels or the concentration of the heavy metals in that treated soil. From our experience approximately 15% of soil treated will have, we should call high heavy metals, beyond the industrial level. So that material has to go to a secure landfill and typically that could go to a secure landfill either in Sarnia or to a secure facility in Quebec. There are two of those in Quebec.

Martha McSherry: Sounds expensive.

Dr. Connett: Again, claiming the equal time provision. I'd like to ask you if you would tell me with the fly ash, which is I presume what we are talking about, the fly ash in particular you say that if that is high in heavy metals that goes to a hazardous waste facility. Do you test the fly ash for dioxin?

Mr. Ponn: We test at four points in the process. The majority of the material that comes out of the process comes out of the kiln because that is the bulk of the treated soil. That one is tested. The after burner has a provision for particulate removal as well as the quench tower has a provision for particulate removal and those streams are tested separately and fabric filter

catch is also tested for dioxin.

Dr. Connett: And how frequently is that done?

Mr. Ponn: It is done in a batch approximately, if I remember correctly the fabric filter is done on a 20 cubic meter batch.

Dr. Connett: And how frequently do you get that? The time?

Mr. Ponn: The time is difficult to predict because some soil treats without much fly ash and some soils are full of fly ash. It is basically volume.

Thank you, I'm Dr. Richard Denton a local medical doctor here and concerned about health for my patients. Just a couple of introductory questions to Mr. Ponn. On one of your slides this morning you showed that the amount that your plant in St. Ambroise was producing in 97 it was 460, in 98 a little over 9,000, in 99 36,000 and then it dropped to 15,000 in 2000. Why was that?

Mr. Ponn: The market was not available at that point. We could only secure enough contracts to contribute 14,000 to the process.

Dr. Denton: I just find that kind of interesting that you're 36,000 one year drop down to 15,000 then go up to 44,000 the following year. It is quite a drop.

Mr. Ponn: It is. It's a market driven thing. It all depends on when volumes of soil comes into the market. For example, this year 2002 the facility in Quebec will probably treat close to 70 - 75 thousand tons. The contracts are secured.

Dr. Denton: Thank you. You also talked about test burns and you gave the numbers for 97 - 99 why not 2000 and 2001?

Mr. Ponn: The 2001 is not compiled yet. The 2000 test burn is given in one of the tables as well. It is in one of the tables where we're comparing different standards from different parts of the world, not just the US max standards and so on. In that one we gave the four years of test burn data.

Dr. Denton: Okay. I was concerned though that I had heard that you had, had, problems with the plant there. That it had been closed for a period of time and that may be one of the reasons why your limits were low. I would like to just quote a paragraph ...

Mr. Ponn: Excuse me Dr. Denton. I don't understand that part of it, why the limits are low.

Dr. Denton: Why, why well if you had to stop obviously if you had to stop you couldn't be processing as much.

Mr. Ponn I don't understand. Are you saying that we had to shut down for whatever reason and we are not processing so much in 2000?

Dr. Denton: Correct.

Mr. Ponn: No, that is totally market driven. There just wasn't any contracts available for that year.

Dr. Denton: Okay. I'd like to quote a letter from a colleague who's the public health director of the Quebec Ministry of Health in St. Ambroise, PQ. Following our examination of this studies findings the Recupere Sol Inc. plant represents a non-negligible emissions source of persistent and bio-accumulating toxic substances, notably lead, mercury, cadmium, dioxin, and furans, which have accumulated on porous soils within at least 1 km radius of the stack. After the plants first two years of operation these very light measurements indicate a lightly contaminated soil. For the moment this is indicative of a low level of risk for human health. However, the contamination source is permanent and of variable intensity. It is layered over other local and defuse (unable to understand word) sources which have not been quantified. Can you comment on that please?

Mr. Ponn: We have prepared some slides on that aspect because Dr. Kennedy's report is not totally accurate as well because he is talking about mercury contamination and our ambient monitoring in a grid pattern at this Recupere Sol Site (unsure of spelling) showed non-detect levels for mercury so I'm not sure what he is alluding to. Okay. Dr. Andrew Kennedy is, how would you say, pushing us into doing more ambient monitoring and we have agreed to do that from now on, on a voluntary basis because there is no regulatory requirements to do that. And we have volunteered to do this. And as a matter of fact this first sampling that was done in November 1999 was voluntary as well. So, I think Dr. Mills can help explain a little bit what was done during the sampling. We hired an environmental consultant by the name of Sedac (unsure of spelling) in the region. And what they did was they went and collected samples in a grid, north, south, east, west grid. One point at 400 meters from the stack, another point is a 1,000 meters from the stack and another point is 2,000 meters from the stack. Maybe Bill you can go over some of the results.

Dr. Mills: Okay, I wasn't involved in the development of the sampling at this point so I was brought in afterwards to sort of look and see what we can say and not say out of the results. And I think that the results overall don't totally say that. There are some questions that are raised that are going to be addressed by additional sampling and better designed sampling programs so

that we can answer questions like what you are bringing up. In this first slide which is the analysis for PCB it was non-detect at all locations. So then the level of detection is very low. It's .05 parts per million in this case which is, in my experience, certainly sufficient to indicate. And the other thing is the wind direction at this site is from west to east basically along about equal amounts along that axis so 50% from the east, 50% from the west and North is directly at the top of the screen. If we look at penachloralphenal here, again these are all very low. You'll see this dot and this is the issue that Dr. Connett raises that this is the point of impingement here but we are also looking at more that just the point of impingement. Again, I would say not really any significant difference one way or the other. For mercury, first of all, there is a variation but the largest amounts are actually on the North South axis as on the East West axis which is more indicative to my review of the thing of a larger area source not point specific. If we look at arsenic I would say that's not showing any impact one way or the other within the variation. It is important to note that even if you have environmental monitoring there is a certain amount of variability that goes on in their measurement uncertainty, etc, and sampling uncertainty so there is some variation and what you are looking at is significantly different from within the normal variation. If we look at chromium here, in fact, the chromium emissions or the chromium, sorry, sampling and this was primarily the soil and its very boggy up there,

correct, I mean it's like moss, etc. So the chromium on the North South axis is actually more elevated than the East West axis or the samples taken to the south. If you look at cadmium the axis to the East, I would say, has elevated levels relative to the others but the most elevated, and when I say elevated unfortunately there was not good baseline before this and that's one of the things I think Bennett has learned is that you need to have really good baseline to really take a number like you are seeing here cause there can be metals occurring naturally. So, there is some natural variation. But the one with the highest concentration is the one directly to the south of 1.5 and that is near a road. And if you look at lead that same sample, which again is on the North South axis not the East West axis. When I looked at the wind rose for the airport near there with the valley I didn't see hardly any NS winds in those wind roses. So the 110 there, which is the most elevated, that actually is sort of at a corner in the road. It's probably indicative of your vehicular transport background. If you look at the PHA again it's not clear to me. There is these two numbers here that look elevated relative to some others but the one directly to the south is still coming out as relatively large. Now when you look, this is a sum of PH's when you actually look at the profiles of them it's looking more like a vehicular traffic diesel exhaust and all of them if they have a detect have naphthalene in them. Now, I think the one that raises as many questions as it answers, now these are the dioxin numbers. These are in parts per

trillion ng/kilograms. So extremely low levels, but still they are there and what you will see in fact is the highest concentration is the one that is directly to the south which is also where the cadmium and the lead was elevated and that is not wind coming from the site but I would still say, that looking at it objectively, there's definitely a need for further studying and monitoring because the ones along the East West axis are elevated relative to the ones on the North. Now, the two points farthest to the North are in deep forest land. And you mentioned Michael McLaughlin, Michael and I both shared the same, Dr. Don McKay was on my Phd. Committee and he was Michael's supervisor. Michael has shown very clearly that forest can act as filters and so one of the things, I don't know it that's what's going on here, but one of the things that any future studies would need to address and certainly around Kirkland Lake as well is whether those are in fact low because there is no impact and there is something going on south of that main east west axis or whether they're not really representative of the background. And the other thing that I should mention though is that the finger print that is in those samples here is significantly different than what is the stack emissions have shown to be in the, from the RSI facility. So, that's, it's true that over a length of time OCDD it concentrates but for a facility that's operating a short period of time you should have seen a, that would not be an issue. So the OCDD to OCDF ratio can be used and you can also look at the pentafurans to the OCDD ratio and when you do that

it's different. What's in the stack, coming out of the stack during the source testing is different from what we are seeing in here. So, it needs further study but at first glance you can really argue it almost both ways so it is inconclusive so it is not conclusive in my first review. But it certainly needs further attention and better designed studies for the future.

Dr. Denten: (The first part was not taped due to changing tape) ... concern, and that certainly we need to be doing further studies. I guess then what further studies would Bennett be doing? Are they going to be doing the things that Dr. Connett suggests doing the animal studies, the milk, the beef, as well as just the soil and also Dr. Mills had mentioned the lipid bags and that sort of thing.

Mr. Ponn: One thing I can say is that we are definitely going to do more studies in St. Ambroise. Dr. Mills will be helping us design those studies so that we will get some answers rather than more questions than answers. As far as what we have to do for Kirkland Lake we definitely would like to have input, constructive input, from experts as to which direction we should go in and advise that into the Ministry and have the Ministry set that as a condition of the environmental assessment. Then we will have no choice but to follow it or not set up shop.

Dr. Connett: I'd like to first of all ask Dr. Willis what period of time do those data points represent? How long were the samples collected for? Were they all soil samples?

Mr. Ponn: Yes it was soil samples taken, composite samples taken on the same time.

Dr. Connett: At the same time. Why did you not look at cow's milk samples or chickens or eggs or anything else? Why did you decide not to do that?

Mr. Ponn: We haven't designed our studies. Like I said this study brought up more questions than answers and we are now designing a study to look at this further. If cows and milk would be a good indicator we will include that into our future studies.

Dr. Connett: Okay, let me ask the question then to Dr. Mills, because you had prior experience, you told us earlier on, with the site in Smithville where you did in fact, you told us, measure beef, dairy and a few other things. With that as your experience why did you not do it for this facility?

Mr. Ponn: Dr. Mills involvement with us just happened recently. This test was November 99.

Dr. Connett: Fair enough. Okay. Then the other question I have for you Mr. Ponn is that you reported a dioxin emission numbers, how many tests do those numbers represent?

Mr. Ponn: Triplicate tests over the four years that we have on the table.

Dr. Connett: So three tests a year for four years?

Mr. Ponn: That's right. So, twelve points basically.

Dr. Connett: So why did you decide to put those down without any error bars, any standard deviations on the number?

Dr. Mills: I agree totally with that point and in fact it's my data that's why I showed all the runs on Smithville. You are right. The data is better to be presented with the variation within those runs.

Dr. Connett: So, so your telling, essentially your saying you took an average of 12 numbers. Each year you did 3 tests, they were 6 hour tests. Six hour tests is that correct?

Mr. Ponn: Six hours per test.

Dr. Connett: So, okay you did three tests, 18 hours worth of data and you just averaged those three numbers?

Mr. Ponn: An arithmetic averaging for that particular test would represent 1997. Yes.

Dr. Connett: So it seems to me from a mathematical perspective, and I'd like to get your comment on this, that an average can be very deceptive and in terms of if you are going to input these numbers into a health risk assessment wouldn't a more appropriate methodology being reporting a 95% upper confidence limit on the data.

Mr. Ponn: I'll let Dr. Mills answer:

Dr. Mills: I can't agree with you more. I just went very quickly through it but in fact that was what I was trying to show in the slide where I showed all my... All I'll say is that you are right and that's in fact what I was trying to show and on the Smithville site I could not believe how close, how little variation there was. When we went by 3 orders of magnitude difference in the feed rate and you saw only about a maximum 25% between the minimum and maximum. Let's just leave it like that.

My name is Stan Gorzalczynski and I'm a Haileybury resident. In light of how square my rear

end feels after sitting on those stairs for half an hour I'll be quick and I'll ask that the respondent be quick as well. I have two questions both directed to Mr. Ponn. After my initial question about risk assessment modeling and exposure ratios you guys had quite a debate here about how important background levels were and how, what I got from it was point of impingement was not adequate and we needed to know more about the ambient air. My question to you Mr. Ponn, if that is the case I would assume that the air quality modeling is the backbone of this EA? Am I right?

Mr. Ponn: That's correct.

Stan Gorzalczynski: Then in your air quality modeling you ignored the point source contributors of Grants Forest Products and the TCI facility as well and if that's the case how accurate is that model in relation to the baseline or the background conditions?

Mr. Ponn: Sorry, I can't answer that question right now because I don't have the exact detail of what was put into that model. I have an idea about how it was created but what was included specifically and what was excluded specifically I don't have the answer to. That model looked at our contribution to the air shed.

Stan Gorzalczynski: I understand that but the just of this discussion that Dr. Connett brought up

was the analogy of the bridge and the cars hit home beautifully. You were looking at the 1/10 and ignoring the fact that there was now 10 cars instead of 9 cars, if I remember the analogy right. And in light of ignoring these two major point source contributors does that not shed some doubt on accuracy of the air modeling?

Dr. Willis: The air modeling that was done, and I'm not an air modeler, but we used their data. The air modeling was strictly looking at the one point source. The other data from the other sources was collected by some background sampling.

Stan Gorzalczynski: Over a two week period.

Dr. Willis: No, for, that's what I don't know. It was a two week sampling period.

Stan Gorzalczynski: Two weeks out of fifty-two weeks of the year.

Mr. Ponn: Can I just make a quick comment on that. The two weeks was used primarily as a screen to see what needs further studying if there is any hits on that screening methodology.

Stan Gorzalczynski: You had quite a hit on BOCs and you ignored it.

Mr. Ponn: I'm not saying that we ignored it or not. What I am saying is that the stack will look at the contribution to the air shed. Again, this becomes an issue of EA versus C of A. If the EA is approved it will go into a one year monitoring for ambient air.

Stan Gorzalczynski: In all due respect Mr. Ponn, the question though was if you ignore the two major point source contributors of, supposedly dioxin and furans and PCBs, is your model accurate?

Mr. Ponn: The model looked at incremental, additional pollutants into the atmosphere in Kirkland Lake.

Stan Gorzalczynski: Okay, so you are saying your model looked at what you were contributing only?

Mr. Ponn: Yes. Now if the EA is approved then we will go into the next, change gear into the second gear and go and model or collect data from the ambient air for one year.

Stan Gorzalczynski: Now, okay that's fine. I have one more quick question. Mr. Wells of Haileybury asked you a question regarding full and scope EA's. Now, understand that Mike Harris has gutted what's left of an incredibly poor act

and made it even more poor but in a full environmental assessment there are two conditions which have to be met and that is reviewing alternatives to the undertaking and reviewing alternative methods to conducting the undertaking. Have you done any of that?

Mr. Ponn: I think we've done a study or a review of the second part or alternative technologies to how to clean PCB soils. We did look at that. We have published that in one of the background documents. We looked at what's available on the market, what's commercially available and can they or can they not do soils.

Stan Gorzalczynski: But you haven't exposed those methods to a full EA?

Mr. Ponn: No, the, because you are right. The minute the government changed the EA act, so we are following what they prescribed.

Stan Gorzalczynski: I understand that but it doesn't make it a full EA. It makes it a Mike Harris EA.

Mr. Ponn: If you wish to call it that. Yes.

Dr. Connett: I would like to respond to that. Now, I'm not sure just where Canada is at

the moment, I'm sure Dr. Willis will correct me if I'm wrong, but during the MRR hearing the Canadian tolerable daily intake was 10 pg/kilogram/day. That's the tolerable daily intake and that's what you compare your dose with. After you've done your calculations you calculate a dose of what somebody is going to get. Now a couple of years back the World Health Organization lowered their tolerable daily intake to 1 - 4 and it is widely recognized that the 4 was political (not sure of word) that science would say it should be 1 pg/kilogram/day, if you do the standard methodology, but again you allowed countries to catch up. You give them the opportunity of choosing 4 which is what Japan did. Because countries do not want to tell people that they are above the tolerable daily intake. Now, with the Canadians, I believe I'm right in saying that the average dose that your getting right now is between 1 and 2 pg/kilogram/day. So you would exceed a standard of 1, you would double it if it were 2. If you include the PCBs which have dioxin like characteristics then you are probably being exposed to between 3 and 6 pg/kilogram/day. So a lot hinges politically on what the Canadians do with that standard. If they dropped it to 1 the, whatever dose you calculated if added to background either 1 - 2 or 3 - 6 would give you either 3 or 7 pg/day which means you would exceed the standard of 1. You would be 70% of the current standard which is a little too close for comfort. This is what you folks should be looking at and the way the consultants may well

handle this so that you don't spot it is to put all the attention on ambient air concentrations and get you to compare ambient concentrations here with other places in Ontario, other places in the United States, cities and rural areas. But, what you are interested in, what it's got to come down to is what dose, what incremental dose are you going to get from this facility, one, and two, what does that dose look like when you add it to the dose that you're already getting. Remembering of course that people in Kirkland Lake are already living next to a facility that handles PCBs. It is therefore, very, important that somebody does some thorough work here to calculate the dose. Having said all that I think a lot of this discussion is premature. I mean I'm glad that it is taking place but I think you should keep at the back of your mind that all these things are relevant if you, the people, living in a democratic country decide that this is the economic development that you want. If it is indeed economic development that you don't want, and if you simply don't want to take the risk whether they are large or small for something that only gives you 30 dirty jobs if that's what you decide all this discussion of health risk assessment is (unsure of word) the obvious. The first thing in a democratic society is to determine what the people want and I would like to ask Mr. Ponn this question. If it became clear to you, Mr. Ponn, I'm not talking about the mayor now, I'm not talking about the councilors of Kirkland Lake I'm talking about the people. The people in this region. If it is made clear to you that the people

in this region, for whatever reason, do not want you to move your facility here will you accept that and not build it?

Mr. Ponn: I think the question that has to be asked is if the people, and you have to define who the people are. Does that mean 50 plus 1 for, or 49% against? Does that mean the majority that we should not come here? And let me make it clear also that the Ministry do listen. They do listen to input and they react accordingly.

Dr. Connett: When I asked, I'm not worried about the Ministry, Mr. Ponn lets assume we have a referendum. If there was a referendum in this region and indeed 51% of the people said they did not want this facility would that be sufficient reason for you to abandon the project here?

Mr. Ponn: I'm not in the position to answer that right now.

Dr. Willis: I have to respond to several questions that Dr. Connett asked. I'll make it very short. First of all the assessment that we did uses both the Ministry's 10 pg/kilogram/day and the WHO 1 value. And the way the assessment was done is we assumed that the cattle and everything we had some of it was at the maximum point of impingement some of it was at the first farm. They were there all of the time 100% and we looked at total exposure from

this facility and compared that to a background exposure that was based on the best background data that we could get. We identified several areas where we think that we need more data to look at the background. And the analogy of the cars on the bridge is a good one. You look at the cars on the bridge and what the analysis shows is depending on which exposure limit you use the bridge is either full or there is too many cars on it already. But what it also showed was that the addition from this facility would not produce any measurable impact on that background.

I'm Ambrose Raftis from Charlton. It has been a long afternoon and I've probably heard more of this technical discussion than I've ever heard before and I'm just wondering how many more years you guys want to go through this because if this project goes ahead it will be another 20 or so because it will be our kids that'll be doing it. So, two areas that I'm concerned about, we keep talking in excess about the modeling that was done by Bennett. It seems to have two fundamental errors to it, one is that it uses the test burn concept which we've heard Dr. Connett talk about as well as Neil Carmen, Dr. Carmen, about the ineffectiveness of the licencing process. For us to hinge our assessment of the value of this project on two processes, that one and the fact that we do have upsets in this process, we are very much eliminating the real impact that this is going to have. I think the discussion becomes kind of academic when the modeling is incorrect and it misses the real impacts of a potential upset. So I'm wondering if we could maybe help people visualize a little bit what happens when you have an upset and you get a dark cloud coming off the plant and it settles in the community. Do you wash it up? What do you do with it? How do

you handle it? What are the impacts of it? Have you cleaned up the contamination that happened in St. Ambroise? Is it still there? Have you stopped doing it? Can you do some tomorrow and still run your plant? Where does it leave the community?

Dr. Mills: Ambrose can I, Mr. Raftis can... I would like to bring, I guess, two issues here. First of all the issue of reliability of test burns. I think that some of the points that Neil raised are valid but in fact I think the Smithville data clearly shows though that the test burn data is representative depending on how you do it and how you stress the (unable to understand word). But we did two formal test burns and the other was just a regular operations. But the same thing to remember is that we were running continuous air sampling at all times at four air sampling stations, during the source testing itself but also all the other regular operations. During that time period there were, I would not say upsets but there were thermal relief vent left open or there was an occurrence reported but non-normal operations to maybe the lay person. In all cases you can not see any, you can not differentiate them. It's not, when it's properly operated and it goes through the secondary combustion chamber you are getting complete destruction or regular destruction. It is occurring there. And in the past there have been some problems but properly operated, I think, a trial burn can be representative. I mean there's not much variation in the data.

Ambrose Raftis: I would suggest that your piolet project there was really quite irrelevant as far as raw tests industrials goes because there are literally hundreds of incinerators that have had burn tests and have had effective results on the tests and the long term operation have been significantly different, significant enough to create health impacts downstream. So I think that your Smithville example, while interesting, isn't real because it is a blank cheque government project done on a small scale, so you'd better do a good job of that one because you had all the money to do it. But that's not how industry runs and that's not how a small project out here is going to be running. When there is a problem we'll feel the problem with health impacts and your pilot project in Smithville will be quite irrelevant except for the data that it drags forward. So I don't really think that your response to that is relevant to be frank and maybe we could hear the other panel talk about where that fits in.

Dr. Connett: Ya, I would simply underline exactly what you said. Look at the Belgium data. The Belgium data went out to test how good these six hour tests were and these six hour tests are what have been used in Smithville and what have been used in Quebec. They compared those to two week tests where you collect the dioxin for two weeks and the concentration was 30 to 50 times higher. So something was happening. I noticed the phrase properly operated. I'm convinced that properly operated it's okay. And yes when the Ministry is on top of it, it's being properly

operated but what you said is these things run for 24 hours a day, 365 days a year. No one is going to be watching you. Instead what you get is with a months notice a company is going to come in and collect 3 six hour samples and send them away to a lab and a few months later you will know what happened on that particular day. What the Belgium data did was pick up what happens between the ideal measurements, the steady state measurements. They picked up the upset conditions Neil has talked about. They picked up start up and shut down, two other places where dioxins are notoriously increased. That was all picked up and I was quite staggered actually because I was expecting a doubling maybe but it wasn't it was 30 to 50 times higher with those tests.

Dr. Mills: If I'm not mistaken that, first of all, was that municipal waste or medical? I don't think it was hazardous waste incinerator it was secondary at 1200 or 1000 was it?

Dr. Connett: It was a municipal waste incinerator but we've got certain parallels with combustion and what happens with dioxin and the formation of dioxin. We jump ...

Dr. Mills: I would say that my experience actually has been much higher concentrations are usually seen in municipal waste and medical waste incinerators and I think the monitoring shows that I think the inventory shows that in general.

Dr. Connett: I don't dispute the fact that it is higher in municipal waste incinerators but what we are talking about is to compare a six hour test with a two week test. That's what we are talking about in the same facility. Whether it is high or low is irrelevant. What is relevant is they compared a six hour test with a two week test.

Dr. Mills: Can I ask just one quick question which is, no matter what technology, we all agree that we have to destroy the contaminated soil, no matter what technology is out there when you are monitoring it to prove the technology is working you are running into the same issue. Most of the alternative technologies also use source testing to prove they are working so if you accept source testing data from one type of alternative technology then what's wrong with using it for incinerators?

Dr. Connett: Well there's a very, very big distinction here because what we are talking about with the chemical system is a closed loop system. It's a closed system. You do something chemically to this solid and then after you've done that you look at the residue of how much is left on that solid. What in fact you do to the ash from the kiln. But by using a chemical system and what Neil was talking about was a cold chemical system what you don't do is to project these things into the air and if you don't project them into the air then they don't fall on grass and they don't go into cows, they don't fall into water, they don't go into fish. So what we should be looking for, and it will be more expensive, is elegant chemical methods for taking apart these problematic materials and not this, what I call the, rambo approach of

taking out a flame thrower and trying to zap them because you can't take out that flame thrower and zap them without projecting tiny little pieces into the air.

Dr. Mills: Dr. Connett I should point out that I actually worked both within the Ministry of the Environment but also I worked for one of the first companies to get the chemical dechlorination method and an improperly operated chemical dechlorination technology handling PCBs can result in emissions and the (unable to understand word) electron process that Neil talked about uses ammonia which has it's own health concerns.

Dr. Carmen: First of all I would emphasis that I have never seen an incinerator permit or a state regulation that limits the number of upset events that you could have during a year. Nor does the permit or regulation limit how long that upset event can last. Nor does it limit how much volume could be emitted. And one of the real questions I would have for Bill is with respect to the so called upset is what was the total amount of unburned PCBs, dioxin, and hydrocarbons and other pollutants emitted? You would have to determine that by building a bubble around the plant and sucking everything through you know some kind of analyzer to see what was the 100% total from that event and then doing your air monitoring, ambient air monitoring, off site and seeing did I get a very good representative sample or not because the winds move those pollutants around during an upset and yes you can get

something in the air but how representative is it in terms of what happened during that one upset. My experience with upsets in terms of incinerators is they are terribly egregious events when you can see big spikes in many of the monitors in terms of the carbon monoxide monitor, hydrocarbon monitor and so you are seeing an opacity monitor. I mean you can see very high levels of emission but most of the time you don't see any analysis of what was the dioxin emitted. How much PCB? And so that's a very, very unacceptable event. But the problem is that the regulatory agencies turn a blind eye and the company promises to run the incinerator better but promises don't protect public health. They don't protect the community and there is a lot of also kinda borderline upset events that don't even get reported to the agencies. They don't get entered into the logs. If you talk to workers who've worked in these facilities you begin to hear the horror stories. A few years ago in Houston a man came at a public hearing on an incinerator and said I work in the PCB incinerator in Deer Park for 25 years in that hazardous waste incinerator in that control room and he said they had lots of problems that were never reported to the State or the Federal EPA. And he said it was a disaster and he said he was glad he retired but he was very concerned about the exposures that he may have gotten from working in that facility. But he emphasized it was a disaster and yet that was a state of the art with two train incinerators for regular commercial hazardous waste and then one for PCBs.

Madam Chair, I don't know if it is proper for me to ask a question so, I was under my time limit for by presentation, so it's up to you.

Chairperson: You can ask one quick question.

And my question, I don't want to add to this debate at all. I think that one of agriculture's problems, maybe we have a lot more problems, but one of the base problems we have is basically the methodology. When under my planning, the way a farmer plans, if I'm going to build a barn a nutrient management plan. And the first thing I do is baseline testing, I know that I've known that since I was 12 years old because agriculture has had problems too. Nobody is going to deny that. But we have, and we didn't learn four years ago that we had to, you don't you don't, in my opinion, you don't order the rafters and then take a soil test. And that's what we are doing here. I know that is a statement. I'm just asking that's ....

Chairperson: Your rambling John. Ask the question.

John Vanthof: Is it important to take baseline tests from meat, milk, etc. before you even plan the undertaking? Yes or no.

Mr. Ponn: I think there's a sequence of events here that has to happen before we go take the samples because as you know if the EA is going to be denied then we would not go and take the samples. The other answer to your question

is that there might be background data already available but in our case there isn't any background data. So we are planning this in two steps that if the EA is approved then we will go into second gear and go do the baseline testing.

Charlie Angus, High Grader Magazine and I'm really concerned, I have to say, at this last minute that you would make an issue about rambling because I have a fear that you will cut me off very quickly. Anyway, I find there is two discussions going on here today. There are people here, justifiably so, who are against incineration under any circumstances. There are people who believe in it. There are other people here who want to know how this will affect Kirkland Lake and our region. This project in particular. I think, I'm just giving these clarifying, because I think we all bring baggage to the table and I bring lots of baggage. Anyway, for me I don't really care about incineration really. Like if we're talking about cleaning up a site because I think that's what we are talking about. Say we're talking about the Macassa tailings. I personally would think, well Mr. Ponn seems to have a very good situation here I'd rather burn the tailings, clean them up and take our chances then leave them. But, this is leading up to a question actually I can see the look. I guess I'm interested in this issue from having covered this for High Grader and CBC and having gone through these processes for Trans Cycle Industries and the issue is why Kirkland Lake comes up, comes up again and again. And if we are talking about a local regional problem is one thing, but now I hear, well, were going to be taking 30 thousand tons from New Jersey, well, maybe 100 thousand tons from Los Angeles, maybe 10 thousand from Hamilton because it is market driven. So I'd like to address my question to you Dr. Carmen because you talked about

the whole notion of government permitting the creation of a sacrifice zone. I'd like, you said and I'll just quote you because I took notes. That these sacrifice zones are in poor areas and you've seen children go to school and seen children get sick, you've met with hundreds of parents and children who suffered from things that never should have been allowed. Now assuming the best conditions at Bennett, but assuming 200,000 tons of contaminated stuff from New Jersey, New York State, from across North America coming into this community every year say for the next 20 years. What kind of impact are we looking at on the people who live here?

Dr. Carmen: I can only speak from experience but when I look at communities where existing incinerators have operated even these, they always claim they are state of the art. The experiences in the communities are just unbelievable to listen too. To me the families, and hear them tell the stories about, not just miscarriages, still borns, children with birth defects, children dying at early ages, children developing cancers because they're developmental systems are so vulnerable to chemical assaults. Yes it's not good if parents smoke and do a lot of other things but the issue is that the children are getting very large chemical assaults through living in these communities because the plants don't operate properly. The regulatory agencies come in and you know there are several communities right now in the US where they have found elevated dioxin levels in the blood of many community people. And guess what they are living near incineration sources. Known dioxin sources. Although it's not necessarily one. So, you know, what do

the agencies do? They continue to study the problem. They take more blood samples. They take soil samples. They look at the food chain. They look at the facilities. But you know at that point the damage is done. If you have children that are sterile. You know you might not find that out until the children are 25 and 30 and getting married and trying to have babies. And guess what the sperm counts are low or something is wrong with the female reproductive system. It doesn't work and at that point the family realizes there's not going to be any grandchildren no great grandchildren. Or what if they are born with more birth defects. You know we have seen with a number of studies that these contaminants do have these multi generational affects and yet. How do you study that? Right now there's not much in the way of multi generational risk assessments. So far, in this case here, with Bennett they haven't even considered the background contributing sources from the other plants in this area. I think you would want to include everything in Canada. Look at the total background from every single possible source, industrial and non-industrial and then you will see that there is simply already too much dioxin out there to allow anymore but yet this burden of these pollutants will be case upon our own biological systems. And our children and our grandchildren will pay the worst price.

Dr. Willis: I agree there is a problem. We have a high background load and when you

look at background the way it was done on these studies and the way it was done on other studies that is what you are doing. You are looking at a composite of total background from all sources by looking at levels in fish, by looking at levels in milk, by looking at levels in beef and that goes into the assessment. That's how these assessments were done. So what those assessments are showing, as Dr. Connett has said, is that our dioxin exposure in Canada is running somewhere between 1 and 6 depending on exactly where you are and what considerations are given, but how good the background data is essentially. And that's in a borderline area. The question is what is the addition of this facility to that background and what the data shows is that the addition is insignificant it's not going to be able to be measured. And these studies, there have been studies that have tried to look at impacts on the health of people living around these facilities and around landfills and all the studies come up negative. Now that doesn't provide me with a lot of confidence because most of these studies are limited because the number of people living around these facilities is relatively small and the power of the studies is low so you can't get a lot of comfort from that. However, I don't think it's reasonable to give information out to the public that these facilities are causing birth defects, low sperm counts and all the rest of these things when there is absolutely no evidence to show that's true. There's birth defects and sperm counts and everything else that are down but is that due to background or is that

due to a point source? That is the question. And I don't think it's from a point source because the point sources is usually low relative to background.

Dr. Connett: I would like to respond to that. It is not true to say that no health studies done near incinerators or landfills have found no health affects. There have been a number of studies. There was a study done in France which showed the elevation of certain cancers. There was a study done in England which showed and elevation of cancer these are where there were incinerators. And there have been other studies with landfill sites. I don't know how Dr. Willis could make that statement.

My name is Anthony Storie I'm from Kenabeek, Ontario. I actually have two questions but I'll try to make them quick. The first one is we've talked quite a bit about upsets of these incinerator processes in sort of a vague sense and upsets in the US. I'm just wondering Mr. Ponn how many process upsets have occurred in the St. Ambroise incinerator in the four years that it has operated?

Mr. Ponn: As best as I can recall I have been advised of four. The four upsets were all related to electrical power interruptions from the grid. Some of those were if lightening strikes the grid and the power spikes or the power drops out. One of those incidence where the car took out a power pole in the car accident.

Anthony Storie: Okay, that's fine. The second part of that question is how many upsets per year are included in the long term health risk assessment modeling that comes out of the air quality monitoring?

Dr. Willis: I was anticipating that question and I'm trying to find it so can I come to you afterwards.

Anthony Stories: Yes, sure that's fine we'll go onto the second question then. Which is the issue of portable versus fixed incinerators or mobile versus fixed incinerators. Bill suggested that he was going to get to that issue in his conclusion of his introductory talk, but he didn't. Just quickly to give some background. I mean I'm no expert on incinerators by any stretch but my big concern with this project is, as several people have already said, that it seems to me it's concentrating the risks associated with getting rid of this hazardous waste from a wide area and it doesn't make a lot of sense to me that if you can do this with portable units such as the one that Dr. Mills' research is based on it doesn't make sense to me that you would ship all the waste to Kirkland Lake. So if Bill or Danny could respond to that and then the other side as well.

Dr. Mills: Okay, I've worked with a number of mobile incinerators and also other destruction technologies and with fixed. And there is pluses and minuses

to both. That's really what it comes out. The I won't say NIMBY, not in by backyard in terms of it's sometimes socially more acceptable for communities when they have a known problem they feel they can look after it themselves. Unfortunately, I've also had a lot of cases where even communities where they have a problem where they for various reasons either they can't or won't do it there and those types of occasions are contributing to the background to long range transport. So ideally if you could do everyone right on the site it would be socially more acceptable. Whether it's technically better I think is sometimes open to concern. It's kind of like looking at whether you'd rather live your house in a fixed house or a trailer. You can have all the comforts of home in a trailer that you tow around versus in a fixed home. I think that in some cases a fixed facility can actually operate more stable and better because it is not being taken apart and put together somewhere else and has to be made, if it's portable, it has to be made so that the design incorporates it's ability to move from place to place. My experience has certainly been that fixed facilities, overall, can achieve better performance. Whether a portable facility can achieve it, I think portable facilities can achieve acceptable performance but I don't think they can achieve as good performance as a fixed facility.

Dr. Carmen: Well, first of all I think this is a primary opportunity for the community to

be involved in making a determination. Will it be a fixed or a mobile unit that is going to operate here in the Kirkland Lake area to clean up the PCB site. Secondly, the community also should be involved in determining what is the technology. There are alternative treatment technologies for example in the chemical assembled chemical weapons program there are two technologies that have gone through demonstrations and have been approved and these were for nerve gases and mustard agents. So you know those are very toxic materials and these are the kinds of alternatives that are available in the market place plus there were three other technologies that are going through demonstration phases. So the community, not the experts, needs to be very much involved in making that determination because then you can look at whether you feel more comfortable with risks involved with alternative technologies. Bill mentioned ammonia, frankly I have a lot fewer concerns about some ammonia exposure than I do with PCBs and dioxin. There is a world of difference. But the community needs to have that primary right to make that decision otherwise your going to be left out of the whole loop and the decision will be thrust upon you.

Dr. Mills: First of all on incineration versus alternative technology. Personally I'm not against alternative technology. I've use them. I've worked for some companies that have them. It's using the most appropriate technology to

achieve the goal that you have. My concern has been that everybody is so worried about incineration that they think that any alternative technology is automatically good. But I've known of several occasions where alternative technologies were initially selected and they could not achieve and they ended up actually having to send the material after all even though they tried to use the alternative technologies. And in these two cases to Bennett's incinerator. I guess my biggest concern is just that the ground rules used for evaluating the technology should be the same for every technology. Any technology should have to meet the same performance requirements if you are going to use it. That's my personal opinion. That's not with Bennett's input. If they are all meeting the same performance requirements then you can make the other judgements.

Dr. Connett: I'd like to make two points. One is when we are talking about alternatives before we get into what alternative actually destroys the material. You heard from Mr. Ponn that the amount of PCBs that are actually destroyed out of a 107 thousand tons was about 7.7 tons of PCBs. The notion of taking truck loads of soil from New Jersey all the way up to Kirkland Lake in order to destroy a fraction of the material in that soil does not make sense. I think that if you were to look at this rationally you would say on site in New Jersey you should do thermal desorption. You should heat the material up in an inert atmosphere and essentially distill off the PCBs. You

will be left with soil which is contaminated with toxic metals but that's what your left with, you've admitted you can't do anything with toxic metals, and so from that great big tonnage of soil which is contaminated in New Jersey you'd be left with a little distilled liquid. Now we can argue about where that liquid goes to. That to me is a much more rational approach to this situation then shipping tons and tons and tons of soil from all over North America to this one site. That's the first point. The second point is I'd like to clarify what we mean by upset condition. There are a number of upset conditions. But if you cast your minds back to the diagram that Mr. Ponn showed at the very beginning you had the secondary combustion chamber and if this is a typical design, and he can tell me if I'm wrong, there is what looks like a skillet on top of the secondary combustion chamber and that skillet if there is a problem if there is an electrical failure if there is a blockage in the filters in any way so that the thing doesn't blow up the skillet opens. At the point that the skillet opens all the gases and all particulates which are in the secondary combustion chamber go directly into the environment with no control what so ever. That's what we are talking about. Now, I'd like to get Mr. Ponn's response to another little practical suggestion. You said this only happened four times to the best of your knowledge in Quebec. Would you have any objection to having a siren on the skillet so that when the skillet opened you had this emergency and at that point this crap is coming out.

This siren would be very useful for parents who for the short duration of time could tell their kids who are playing in the front yard to get inside. Or switch off the air conditioners or switch off suction fans. This is a very simple idea. A siren wouldn't even cost a thousand dollars probably. A very, very simple indeed. And I'd like to get your response to these two things. Number one is what is your response to thermal desorption on site and only dealing with the liquid that's distilled. And second the questions is a siren to tell people on the very rare occasion that it happens that the skillet has opened.

Dr. Mills: Can I address the first one because that's what my research was trying to look at is the importance of PCB liquids relative to soils. So this is an issue that depending on the site that you talk about you can actually increase the PCB fugitive emissions from concentrating it into a liquid. If you saw once we destroyed all the PCB liquids we had much lower emissions. Now, it depends on the quantity, it depends where it is, it depends whether it is properly sealed and by properly sealed you basically have to show that it is air tight that smaller quantity. I have been involved in some cases where we have done that where we have done the either solvent or thermal desorption and then you take the liquid to another facility for destruction. But you've got to remember if you don't handle that liquid that's now high concentration liquid that you could actually have more fugitive emissions.

So that's really, and then the other thing was about transportation distance. Well if you are in the US in New Jersey the closest facilities, first of all PCBs could not cross the US/Canada border so it's not about PCBs but about the hazardous materials, but most of the US facilities that material would go to are much farther away than Kirkland Lake is and so in terms of the trucking costs the trucking emissions and that. Deer Park and Kimball, NB. ...

Mr. Ponn: ... So if you look at the radius they are a bit further than coming up to Kirkland Lake so in terms of a global emission for trucking it is actually less to come to Kirkland Lake. Now, on the second question of putting a siren. I believe we have a siren at the site. I'm not 100% sure how loud that siren is. We also have a flashing orange light. So I'll check on that. And the other thing is that we will consider your suggestion about making that siren loud enough. But I'm not sure if the Ministry will allow that but at this time we will take that as a consideration and we will look at that.

Dr. Carmen: I have a couple of quick comments to make. Number one the thermal relief vent or bypass vent has no monitoring that is normally required. Is that correct?

Mr. Ponn: Yes that is correct.

Dr. Carmen: So there is no monitoring, you have no idea nor does Bennett have any idea what will come out that thermal relief vent the bypass vent. Secondly, with respect to what can be imported and exported on PCBs that's true. There is a big concern right now that those laws may be changed in the next year. So maybe certain things can't be imported right now but with our republican administration in Washington, DC anything is possible.

Anthony Storie: Did you find the number of upsets that are included in the long, and this is not short term acute modeling this is the long term modeling.

Dr. Willis: Let me describe what we did. What we assessed was a vent bypass ..

Anthony Storie: One, one event.

Dr. Willis: We assumed there was four during the year and each one lasted for an hour.

Anthony Storie: Four during each year. For the long term. Okay.

Dr. Willis: And the problem is that the assessment primarily focuses on hydrochloric acid ...

Anthony Storie: So there is no dioxin, PCBs. Okay. And finally, can TCI mix it, you know your neighbour there TCI with their concentrated liquids which are currently recognized as a significant problem that needs to be handled, if they for some reason were able to get their hands on some soil and mix their liquids into the soil and ship them to Bennett would that be an acceptable practice?

Mr. Ponn: I think what you are describing is illegal at this point in time.

My name is Chris Bisson and I live in Chaput Hughes and the reason I'm here today is this little flyer contains a quote and I suppose this flyer is produced by the sponsors of this event. It says the Chaput Hughes neighbourhood is one of the older areas in Kirkland Lake and is not known as a preferred area for home purchases. It got me a little concerned when I read yesterday's Northern Daily News, our local paper, because in it there is a flyer from a local real estate company and there's probably a couple hundred homes listed in there with a couple from Chaput Hughes. The ones from Chaput Hughes are sold. So I thought well I'll drive around town and take a look and just at the newer neighbourhoods. I had trouble finding the newer neighbourhoods I didn't know, I'm still not sure which they are, a few streets here and there. I looked around and pretty much every neighbourhood I went in had more homes for sale than in Chaput Hughes. So I'm here today because I really got to question what these consultants, I don't know who the consultant were and I don't really care, but I really got to question their impartiality when they go and do something cause they make a statement like this. I'm not a

demographic engineer or whatever but it certainly doesn't make sense to me. I just drove around and looked and it seems to me like you put a house for sale in Chaput Hughes and it's going to sell a lot faster than any most other neighbourhoods in this community. So that brought me here today.

Chairperson: Chris, you mentioned in the beginning of your presentation that the flyer was promoted by the group that was putting on sponsoring this meeting today and unfortunately that's not correct that flyer was not made up by the Temiskaming Federation of Agriculture.

Chris Bisson: I recognize that as a quote from the Bennett's report cause that's what it says here but whoever made the flyer is what brought me here in any case. I do have a couple of questions. I wasn't able to be here all day but if this project is going to be so safe and my home and my property is going to be safe from being polluted by your company will Bennett guarantee me in writing that if my property does become polluted as a result of your activities will you purchase me property where it is safe? Will you build me a house or purchase me property with a home comparable to mine and if you won't do that why not if it is so safe? My only other question is, and it's probably been answered here but like I say I got here a little late, why build this plant in the middle of town? There are thousands upon thousands of square kilometers that are undeveloped or underdeveloped.

Why build it in the middle of a town?

Mr. Ponn: Let me answer your second question first because the site was really selected for us by the Citizens Advisory Committee on the recommendation of the town by offering eight sites that were available. So being unfamiliar with the Kirkland Lake area we took the recommendation at face value and went with it. As far as guaranteeing you value or compensation for your property I think there was some wording on that regarding that aspect on one of the environmental assessment studies. I'm not quite sure if it is the social economic or it's the economic study that contains wording about that. But that is something that we will be negotiating with the Ministry in terms of those kinds of issues of liability because we do have to post a bond on the performance of this facility.

Dr. Carmen: I would just respond by saying that even if Bennett were to kindly sign an agreement with every citizen in Kirkland Lake to offer to buy you out if your property becomes contaminated. The problem I've seen is those agreements are often crafted by lawyer and unless you have a lot of money to enforce that against Bennett they can make all kinds of written promises and agreements and yet how are you going to enforce that. Is the Ministry of the Environment going to enforce that, is the city going to enforce that. No. Your going to have to hire your own lawyer and sue Bennett to get

these kinds of agreements. They look good in principle on paper but enforcing them that's the real catch 22.

At this point in the meeting the presenters were given 5 minutes each for closing comments. Of special note the Bennett side was given only 10 minutes between the three speakers.

John Vanthof thanked the expert panel members on behalf on the rural community for attending the very informative meeting. He also thanked the Chairperson, Darlene Bowan for charing the meeting on very short notice.

The Chairperson thank the Temiskaming Federation of Agriculture for hosting this event.

The meeting was adjourned at 4:26 p.m.

Appendix A
Temiskaming Federation of Agriculture
Presentation
Information Seminar
January 5, 2002

Temiskaming Federation of Agriculture Presentation

John Vanthof President

Public Information Seminar Bennett Hazardous Waste Impacted Materials Incinerator.

Ladies and gentlemen, my name is John Vanthof. My family operates a dairy farm just south of Englehart. I am currently serving as president of the Temiskaming Federation of Agriculture (TFA) The TFA has 400 farm business members who account for one hundred million dollars in direct and indirect sales in Temiskaming annually.

At the outset of my presentation, I would like to clarify our position regarding this or any other development proposed for our district. Our only interest in any development is to ensure that none of our members are negatively impacted by the proposed project.

Several years ago when our Board was first approached by Bennett, we stated that they should credibly demonstrate to us that this facility would not affect our livestock, our products, or our ability to gain a lively hood from our farms.

We made the same request to the Ministry of Environment and some of our concerns were reflected in the Terms of Reference for this undertaking.

In response, Bennett commissioned a study referred to as Agricultural Impact Assessment, Appendix F. The first draft of that study was released in September 2001. A subsequent draft was released in November 2001, and the Main Volume of the application was released in December 2001.

The TFA struck a committee to study the agricultural draft submission and supporting documents. Federation members also attended all of Bennetts open houses.

It soon became apparent to our Board that there was no possibility in this process to get a second qualified opinion or peer review of Bennett's submissions, conclusions, or answers to questions. Having gone through EA applications in the past that included peer review, we found this very frustrating. That was the seed that grew into this seminar.

Since the majority of the potential impacts, both positive and negative will occur in the Kirkland Lake area, we felt that if such a meeting were to be held it should be in Kirkland Lake. We approached several organizations including the Kirkland Lake Chamber of Commerce to co-host this seminar but for various reasons they all declined. At that point, we were forced to host this seminar on our own. We asked a prominent KL media personality to chair this meeting but that offer was also declined. In an interview, with a local media outlet, I also made it known that we were looking for a chair from Kirkland Lake but we had no response. We have a very capable chair person but it is unfortunate that no one from Kirkland Lake came forward.

To their credit, Bennett immediately accepted our invitation and have always been cooperative. We invited Public Concern Temiskaming to provide qualified individuals and they also readily accepted. We sent invitations to all municipal councils, community groups, and industry stakeholders in Temiskaming to make presentations and participate in this meeting. We also placed ads in the Northern Daily News, Temiskaming Speaker, as well as spots on CJKL and CJBB.

One point that I want to make very clear is that this seminar is part of the Public Consultation Process for the Environmental Assessment Act Application for Bennett's proposal. This meeting is being taped and official minutes are being taken. They will be forwarded to Bennett and the Ministry of the Environment as part of our EA submission. Copies of the minutes will be available upon request. It should be noted that this is an open public meeting as is required by law when a proponent makes a presentation during an EA application process.

Our comments on the Agricultural Impact Assessment, Appendix F and its supporting documents including Air Quality Monitoring Program Appendix B-1, and the Main Volume of the Draft Submission as it pertains to Agriculture are as follows:

It should be noted that some of the documentation is still under review so there could be more comments when our review is completed.

Our first impression of the Agricultural Impact Study was that it seemed more like an economic evaluation of agriculture instead of a biological risk assessment study. In fact, less than a third of the main text is devoted to the methodology and results of the risk assessment itself. We question the heavy emphasis on economic activity compared to biological risk.

Field Data Collection: The data collection also seems to focus on economic value of agriculture in Temiskaming instead of risk assessment. Economics can be based on book values. We see absolutely no need to do field data collection for economic purposes. We question the validity of doing road side reconnaissance of cropping practices in early November in Northern Ontario especially in November 2000. In or opinion, the field data collection that was documented served little if any purpose in this risk assessment study.

Animal Tissue, Soil Concentrations, and Above Ground Plant Concentrations as they relate to Baseline Conditions: It is unclear where, when, how or if actual site specific samples were taken. We find this very puzzling since there is no shortage of graphs, maps, and tables describing the field data collection of economic information. In our opinion, the importance of accurate, understandable and verifiable biological baseline data cannot be over stated and it must be described in much greater detail. We were expecting to see this information in the field data collection report.

Other Point Sources contributing to cumulative loading. When our Board was first approached by Bennett, their representative informed us that there were already greater sources of emissions in our area than Bennett would create. One of these potential sources is named in the documentation, but we are unable to verify if it was included in the calculations. Because of the complete lack of information regarding base line sampling, we were also unable to confirm if any samples were taken in the influence zones of this point source.

Long Term Monitoring. In our opinion, it is irresponsible to make predictions twenty years into the future and not conduct a long term verification program to confirm your predictions.

Based on the above concerns, we feel that Bennett's conclusions regarding agriculture in the Main Volume of the Environmental Assessment Act Application are suspect mainly because they are not verifiable. The Board of Directors of the Temiskaming Federation of Agriculture plans to petition the Minister of Environment for a Full Environmental Assessment Hearing on the Bennett Proposal.

That concludes my presentation. Madame Chair.

Appendix B
Public Consultation Methods
Information Seminar
January 5, 2002

Fax Transmission from the Temiskaming Federation of Agriculture
2 pages

Englehart, Ontario
December 27, 2001

To: Municipal Councils, First Nations, Community Groups, Boards, Industry Stakeholders and Media,

From: The Temiskaming Federation of Agriculture
C/o Dianne Mitchell secretary RR 1 Englehart, Ont. P0J 1HO

The Temiskaming Federation of Agriculture (TFA) is an affiliate of the Ontario Federation of Agriculture. Our mandate is to represent the interests of the agricultural industry in dealings with other industries, and organizations, as well as all levels of government. The TFA has 400 farm business members. The agricultural industry is the backbone of the economy of southern Temiskaming. Farm gate sales exceed forty million dollars annually. The main income generator is dairy production. Milk produced in Temiskaming is consumed throughout Ontario.

Our members have expressed concern regarding the proposal by Bennett Environmental to build a PCB incinerator in Kirkland Lake. Presentations have been made to our Board by representatives from Bennett as well as groups opposed to the development. We have also reviewed documentation provided by all parties including the draft EA documents recently submitted by Bennett.

The Temiskaming Federation of Agriculture has not taken a position regarding this project although we do have some very serious concerns. They include long term human health effects and short and long term marketability of our agricultural products.

Our review of the Bennett EA documents has identified several problem areas. There seems to be a lack of provision for a worst case scenario as well as a failure to adequately address the cumulative effects of the emissions of this facility when added to the load produced by existing and other proposed facilities.

In order to gain a better perspective on these and other concerns, we are going to hold a public information seminar on the Bennett proposal and the PCB disposal industry in general. All stakeholders have been invited to make presentations as well as debate the merits and risks of this proposal. Any unresolved concerns that are identified will be

forwarded to Bennett and the MOE to be considered as part of the EA process currently underway for the Bennett proposal.

The seminar will be held on January 5, 2002 at Northern College in Kirkland Lake from !0:30 a.m. to 5:00 p.m.. There will be a ninety minute break for lunch.

We apologize for the short notice for this seminar but some of the Bennett EA documentation was not available for study until mid December and comments have to be returned to Bennett by January 15, 2002 so we are under a fairly tight time line. The fact that the comment period coincides with the holiday season makes the timing even more difficult.

Tentative agendas, speakers' lists etc. will be available on January 2, 2002. Due to the above mentioned timing problems if your organization wishes to make a presentation, additions will be made to the agenda up to January 4, 2002.

We urge you to attend this seminar and actively participate in the discussion. For further information, please contact us at the number or address listed below.

Yours truly,

John Vanthof TFA President telephone & fax 705 544 7451

Temiskaming Federation of Agriculture
C/o Dianne Mitchell TFA Secretary
RR #1, Englehart, Ontario
P0J 1H0

cc: Bennett Environmental
Ontario Ministry of Environment
Ben Serre MP Temiskaming Cochrane
Dave Ramsay MPP Temiskaming Cochrane

List of organizations and individuals that were faxed invitations, agendas, and speakers list regarding public information seminar hosted by TFA.

Armstrong Township
Brethour Township
Casey Township
Chamberlain Township
Town of Cobalt
Coleman Township
Dymond Township
Evanturel Township
Town of Englehart
Gauthier Township
Town of Haileybury
Harley Township
Harris Township
Hilliard Township
Hudson Township
James Township
Kerns Township
Town of Kirkland Lake
Town of Matatchewan
McGarry Township
Town of New Liskeard
Village of Thornloe

Matatchewan First Nation
Timiskaming First Nation
Temagami First Nation
Beaverhouse First Nation

Radio Nord
Northern Daily News
Temiskaming Speaker
Radio Canada
Timmins Press
CKBB Englehart
CJKL Kirkland Lake
ACFO Temiskaming
CBC Sudbury
CJTT New Liskeard
TVC Notre Dame du Nord

Ariane Heisey MOE
Benoit Serre MP

Contact list cont.

David Ramsay MPP
Gilles Bison MPP
Northwatch
Temiskaming Board of Health
Ontario Federation of Agriculture

Advertising for Public Information Session
Paid by Temiskaming Federation of Agriculture

This announcement was aired on CJKL Radio in Kirkland Lake and CJBB Radio in Englehart on January 3 and 4, 2002. The TFA purchased 10 spots per day on both stations.

The Temiskaming Federation of Agriculture is hosting an information seminar concerning the Bennett Environmental proposal.

An expert panel including representatives from Bennett will make presentations and participate in an open question period.

This forum will be at held at Northern College, Kirkland Lake Campus on Saturday, January 5, 2002. It will run from 10:30 a.m until 5:00 p.m.

This public meeting will focus on all aspects of this proposal, including public health, environmental impacts and agricultural concerns.

You are encouraged to attend and participate in this important discussion.

The following ads appeared in local newspapers. The first one was in the January 3 edition of the Temiskaming Speaker.

The second ad was in the January 2 and 3 editions of the Northern Daily News.

Advertisement size has been increased for clarity. Actual printed size was approximately 4 inches by 6 inches.

It should also be noted that Dr. Mills' relationship with Bennett Environmental Inc. was incorrectly described in the ads. We faxed drafts of the ads to Bennett before we placed them in the newspapers. We later learned that there was no one in Bennett's office due to the holiday season. By the time that the mistake had been brought to our attention, the newspapers had already been distributed. Dr. Mills' job description was changed in the speakers list that was distributed.

Public Information Session

The Temiskaming Federation of Agriculture is hosting a public information seminar concerning the hazardous waste incinerator proposed for Kirkland Lake.

January 5, 2002
Northern College - Kirkland Lake
10:30 am - 5:00 pm

Speakers include:

- Dr. William Mills, lead consultant for Bennett Environmental, is responsible for the design of the proposed facility.
- Neil Carman, former EPA inspector, is an incineration specialist based in Texas.
- Dr. Paul Connet, professor at St. Lawrence College, is a risk assessment specialist on the impact of dioxins and toxic metals on biological systems.
- John Vanthof, president of Temiskaming Federation of Agriculture, is responsible for outlining agricultural concerns.

Presentations will be followed by an open question period and closing statements by the panellists.

The Temiskaming Federation of Agriculture

The Temiskaming Federation of Agriculture is hosting a public information seminar concerning the hazardous waste incinerator proposed for Kirkland Lake. January 5, 2002 Northern College Kirkland Lake Campus 10:30 a.m. to 5:00 p.m.

Speakers include:

•**Dr. William Mills,** lead consultant for Bennett Environmental, is responsible for the design of the proposed facility.

•**Dr. Neil Carman,** former EPA inspector, is an incineration specialist based in Texas.

•**Dr. Paul Connett,** professor at St. Lawrence University, is a risk assessment specialist on the impact of dioxins and toxic metals on biological systems.

•**John Vanthof,** president of Temiskaming Federation of Agriculture, is responsible for outlining agricultural concerns.

Presentations will be followed by an open question period and closing statements by the panelists. This public meeting will focus on all aspects of this proposal including public health and environmental impacts. You are encouraged to attend and participate in this important discussion.

Appendix C
Agenda
Panel Member Introductions
Information Seminar
January 5, 2002

Fax Transmission Cover Page

From: The Temiskaming Federation of Agriculture

To: First Nations, Municipalities, Community Groups, Boards, MP, MPP, Industry Stakeholders, and Media.

Subject: **Public Information Seminar on Proposed Hazardous Waste Impacted Materials Incinerator to be built in Kirkland Lake.**

3 pages including cover.

Attached is the agenda and speakers list for the upcoming seminar.

The high calibre of the speakers on all sides of this issue promises to provide a very interesting and informative session. All interested parties are invited to attend and join in the discussion. This is an open, public meeting.

This meeting has been organized by the Temiskaming Federation of Agriculture but discussion topics will not be limited to agricultural issues. Other topics expected to be discussed include possible long term human health impacts and biological impacts etc.

For more information contact:

Bennett Environmental Inc. Danny Ponn, P.Eng VP & COO (905) 339-1540 ext.201

Public Concern Temiskaming Terry Graves (705) 647 7307

Temiskaming Federation of Agriculture John Vanthof (705) 544 7451

Temiskaming Federation of Agriculture
Public Information Seminar on
Bennett Environmental Inc.
Proposed Hazardous Waste Impacted Materials Incineration Facility

January 5, 2002

Main Auditorium, Northern College, Kirkland Lake, Ontario

10:30 a.m. to 5:00 p.m.

Agenda:

Call to order, welcome, outline of procedures, etc.
Chairperson: Mrs. Darlene Bowen, Ontario Federation of Agriculture Member Services Representative, Northeastern Region.

Presentations by Expert Panel Members:

Mr. Danny Ponn, VP & COO Bennett Environmental Inc.
Dr. William Mills, Mills Consulting Inc.
Dr. Neil Carmen, Public Concern Temiskaming
Dr. Paul Connett, Public Concern Temiskaming

Presentation by Temiskaming Federation of Agriculture:
Mr. John Vanthof, Federation President

Open Question Period

Closing Comments by Presenters

Adjournment

There will be a break for lunch as well as an afternoon break.

Temiskaming Federation of Agriculture
Public Information Seminar on Bennett Environmental Inc.
Proposed Hazardous Waste Impacted Materials Incineration Facility

Panellists Backgrounds:

Danny Ponn, P.Eng. is the lead contact for this proposal. He is a professional engineer and is currently Vice President and Chief Operating Officer for Bennett Environmental Inc.

Dr. William Mills, is the principle of Mills Consulting Inc.

Neil Carmen, PhD has a BS and MS in botany from the University of Iowa at Iowa City, 1967 and 1970 and a PhD in botany emphasizing phytochemistry from the University of Texas at Austin, 1973. He was chief of the regional stack sampling team testing air emissions at industrial plants for the Texas Air Control Board from 1980 to 1992. He is currently employed by the Sierra Club, Lone Star Chapter. A complete listing of his work, published papers and environmental awards is available upon request.

Paul Connett, PhD, recieved his undergraduate degree from Cambridge in England and did his PhD in chemistry at Dartmouth in the USA. He is a professor of chemistry at St. Lawrence University in New York and for the past fourteen years has researched the issues of waste management with a particular interest in dioxin. He has given 1400 public presentations in 48 states, 5 provinces and 39 other countries. He has co-published seven papers and co-produced ten videos on dioxin.

John Vanthof has operated a dairy farm south of Englehart, Ontario since 1984. He has been a Director of the Temiskaming Federation of Agriculture (TFA) since 1992, and is currently President of this organization. He is an elected member of the Temiskaming Dairy Producers Committee and is currently serving his third term as a councillor in the Township of Evanturel.

Minutes of this meeting will be taken by the TFA and submitted to the MOE as part of the Temiskaming Federation of Agriculture Report on the Bennett proposal. Copies of the minutes and written presentations can be obtained by contacting:

Temiskaming Federation of Agriculture c/o Dianne Mitchell, TFA Secretary
RR 1 Englehart, Ont. P0J 1H0

Appendix D
Audio Files
Public Information Seminar
January 5, 2002

Audio files
Bennett Environmental Inc.
Public Concern Temiskaming
Ministry of Environment
Temiskaming Federation of Agriculture