

**Keepers of the
Athabasca**

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Muhammad Aziz
Designated Director under the Act
Alberta Environment and Parks, Operations Division
Suite 1, 250 Diamond Ave.
P.O. Box 4240, Spruce Grove, AB T7X 3B4

January 19, 2015

Dear Mr. Aziz and Alberta Environment and Parks,

RE: Suez response to our concerns about Application No. 012-1744

Our membership's concerns were expressed directly to Alberta Environment and Parks on June 8, 2015. As the regulator for the Swan Hills (hazardous waste) Treatment Centre (SHTC), we expect that Alberta Environment and Parks are the responsible body to respond to concerns. You are the government agency that regulates SHTC, keeps track of incidents, inspects the premises, issues the Approvals, and in general keeps the owners of the SHTC, and the citizens of Alberta, in the know about what is going on there. We were extremely surprised to receive a response to our concerns from Suez Environmental, the contractor who performs operations at SHTC, on November 4, 2015. While we have responded to their letter, and you will receive a copy of our response, we are disappointed not to receive a response to our concerns from Alberta Environment and Parks. You are the only agency who is able to help us resolve these issues.

Additionally, through verbal contact with SUEZ at their Stakeholder meeting on November 4, 2015, we were given to understand that the previous Approval has been extended for a period of one year while concerns are resolved. We were not notified in writing of this, and hope to expect more clarity in future within the process, in order to properly represent our membership and present our concerns, which are shared by a great many people and groups in Northern Alberta.

As we have addressed the response to SUEZ in other correspondence, this letter details only specific monitoring and technical requests which would help allay our concerns about SHTC. Alberta Environment and Parks is the only agency able to facilitate these requests.

- We recommend less dangerous methods of hazardous organic waste treatment that do not include incineration, for example, the process called super critical water oxidation, developed by Innoveox of France (<http://www.innoveox.com/>). Here is a review of the technology: <http://www.recyclingproductnews.com/article/1635/quotrevolutionaryquot-organic-industrial-waste-treatment-technology-introduced-to-north-america>. When our member group the Society of High Prairie Regional Environmental Action Committee referred this technology to the operators of SHTC in 2011, they did not respond favorably.

- We ask that environmental monitoring be accomplished much further afield than is currently accomplished. Current monitoring stations are all within 20 kilometers of SHTC, when aerial emissions are known to travel much further as evidenced by this 2015 video produced by Environment Canada:

<http://www.theweathernetwork.com/news/articles/new-video-of-prairie-pollution-raises-air-quality-concerns-/58282/>

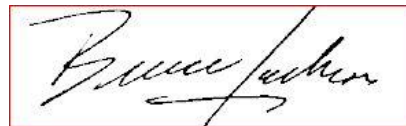
We ask that monitoring stations be established at or near the following locations, and possibly other locations to be identified, with the objective of tracking emissions specific to SHTC:

- **Town of Athabasca**
- **Town of Slave Lake**
- **Town of Fort Assiniboine**
- We ask that further lake sediment core samples be taken from the Lesser Slave Lake, at least one each from the East Basin and West Basin, and that these samples be analyzed for PCBs with an eye specifically to the years with ‘un-planned releases’ at SHTC.
- We ask that the PCBs found in lake sediment core samples that are “close in timing to the accidental release(s)”¹ from the Lesser Slave Lake be analyzed for their ‘fingerprint’ and that these are compared to the profile of PCB waste that was incinerated at that time, or that was otherwise accepted and subjected to fire or explosion at SHTC. We researched the hourly wind data report for July 11, 2009 from the Government of Canada on this, the date of the last ‘unplanned release’, fire and explosion at SHTC. Winds were blowing directly toward the Town of Slave Lake during this incident, which released immeasurable amounts of PCBs, dioxins, and furans directly into the atmosphere.
- We request copies of any studies, monitoring or reporting pertaining to wild game, fish, berries or other medicines.
- We request the initiation of talks to accomplish further studies, in partnership with Lesser Slave Lake Indian Regional Council and local First Nations to determine the extent, and in particular, any rate of change or bioaccumulation of PCB’s found in their membership.
- To state our concerns in general regarding SHTC: a) how far do their emissions travel, b) how much bioaccumulative pollution exists for the people and environment of northern Alberta due to burning toxic waste for the past 30 years (specializing in PCB waste), and c) what is our increased health risk because of this.

Thank you for your work.



DougBadger, Co-chair



Bruce Jackson, Co-chair

Cc: Hon. Danielle Larivee, Minister of Municipal Affairs, Lesser Slave Lake MLA
Fidelma Horgan, Alberta Environment and Parks

¹ State of the Watershed Report 2015 (Hutchinson Environmental Sciences Ltd. for the Lesser Slave Watershed Committee), page 57