

David Blain

JANET



CITY OF CHILLIWACK  
OFFICE OF THE MAYOR

July 2, 2010

Lois Jackson, Chair  
Metro Vancouver Board  
4330 Kingsway  
Burnaby, BC V5H 4G8

Dear Ms. Jackson,

Re: Metro Vancouver Draft Solid Waste Management Plan

The City of Chilliwack (City) has actively followed the development of the Metro Vancouver Solid Waste Management Plan. We recognise that it has been a very long process for Metro and included many discussions at the board and numerous public meetings.

There is a lot in the plan that the City can support. Goals #1, minimize waste generation, and #2, maximize reuse, recycling and material recovery are by far the best methods for managing waste today and into the future. Only with an overall reduction in the amount of waste that has to go to disposal can we sustainably manage our impact on the environment. The City shares these goals and certainly would be happy to discuss any partnering opportunities that may arise.

It is recognized that there will be an amount of waste that must go to disposal and it is in the proposed approach to be taken that we must respectfully disagree with Metro. Incineration is not the best solution to the problem. This objection is based on a number of issues that will be discussed below.

The first is the obfuscation around the term 'waste to energy'. This has been presented as representing a suite of options ranging from pyrolysis and gasification to anaerobic digestion. The reality is that anaerobic digestion is not used for solid waste disposal and the alternative combustion technologies are either not proven or have been unsuccessful in commercial operation. This was confirmed by Metro's European expert at your public information meeting in Chilliwack on September 16, 2009. As a result, unless there is a desire to risk hundreds of millions of dollars on an unproven process, the only realistic option is mass burn incineration. Metro's attempts to present a wider range of alternatives only leaves the unfortunate impression that there is a desire to keep the discussion deliberately vague until the final decision is made. The process should be called what it is, incineration with some potential for energy recovery.

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Of course, the most important concern that the City has with respect to the proposal for an incinerator is the potential impacts on the Fraser Valley air shed. It has been established that the Fraser Valley is a unique air shed with significant vulnerability to pollution due to the funnel effect of the surrounding mountains. The sensitivity of the air shed has been underlined in reports by leading UBC researchers including Dr. Douw Steyn and Dr. Ian McKendry. Both of these experts have stated that adding the air pollution load from an incinerator to the local air shed is a critical concern. This is no different from the arguments put forward during the debate over SE2 which Metro supported.

We agree that there are many sources of pollution and that they should all be reduced as far as possible. That is the only way the air quality in the valley can be improved to the point where citizens can enjoy the quality of life that they are so entitled.

Adding a significant point source to an already stressed air shed is not a reasonable approach to take. The argument that waste management represents 'only' 0.3% of the total pollution load is untenable. We should be trying to reduce the pollution load, not make excuses for increasing it. In addition, garbage is a very complex fuel that leads to significant emissions of concern. Even the best pollution control technology will not remove 100% of the contaminants emitted from burning this complex mixture of chemical compounds.

With regard to discharges from the incinerator stack, the Draft Solid Waste Management plan is very vague as to what the target discharge limits are beyond a commitment to best available technology. This is a critical issue since both the modelling, the cost estimates, and the comparison of alternatives must have all assumed a certain level of discharge from the stack. The plan would be improved if Metro were to identify the stack limits that will govern the facility and demonstrate why they are equal to the best in the world. If in the future you are able to do better than this published limit, all the better, but a baseline must be established now.

Although the City has not undertaken an extensive analysis, we do have some concerns that the cost estimates for the incineration option may be low. Other analysts have also identified potential issues with the costing. Cost overruns will primarily be an issue for Metro but from Chilliwack's perspective, it affects the option selection and is a significant indicator of the level of emissions control that Metro is planning for their proposed facility. We strongly recommend that a peer review of the cost estimates be undertaken particularly with respect to strengthening the reliability of the capital and operating costs for the proposed facility.

Finally, since there is no site selection it is difficult to know if all of the proposed benefits will be realized. If the facility is located in Tsawassen then the district heating benefits will not materialize. In fact, in order to obtain all of the advertised benefits the facility has to be located in the core of an urban area. Has Metro identified suitable sites and have member municipalities agreed to this?

With significant questions still outstanding relating to the cost estimates and the site selection process the final project may be significantly different from the one being presented to the public. Without district heating, the greenhouse gas emission advantage of incineration will be reduced. Tendered costs could be significantly higher than advertised. Will there be an iteration where a further review of the preferred alternative will occur? At a minimum, a sober second look at the decision making will be important given the amount of uncertainty attached to the current plan. If this is not built into the process then a considerable amount of additional work is required before the plan is adopted.

In summary, the City of Chilliwack can find a lot of positive actions in Metro Vancouver's Draft Solid Waste Management Plan. The effort to be put into reducing the amount of waste generated and the diversion of as much waste as possible to reuse and recycling are admirable goals that we wholeheartedly endorse. The City of Chilliwack must, however, oppose the construction of an incinerator which will represent a major new point source of pollution in the Fraser Valley. A revisit of the analysis, based on concerns raised here and in other forums, will result in a more favourable assessment of the landfill option.

Thank you for considering our views. If you have any questions, please contact me at 604.793.2900.

Warm regards,



Sharon Gaetz  
Mayor

CC: Honourable Barry Penner, Minister of Environment  
John Les, MLA, Chilliwack  
Greg Moore, Chair, Solid Waste Management Committee

