

Policy Directive:
Teepee Incinerators Approvals

Division: Pollution Prevention

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Subject:

Teepee Incinerators Approvals

Objective:

To guide staff of the Department of Environment and Lands and Municipal and Provincial Affairs, (and thereby, municipal officials) on the circumstances which would see the issuance of a Certificate of Approval for the establishment and operation of a waste management system employing a teepee incinerator as a means of waste treatment and volume reduction.

Background:

This Department (in recognition of our harsh climate rugged topography, isolated nature of many of our communities, and the depressed economic conditions of many of our areas) has historically approved open burning on most landfill sites in the November to April period. Also we have historically approved teepee incinerators which allow burning during the forest fire season and further conserve usually very limited backfill material. This has been justified by a 1980 Report by Proctor and Redfern Limited for the Department of Municipal Affairs which states teepee incinerators should be an important disposal means for Newfoundland municipalities for many years to come.

While hospital and airport incinerators usually employ better emission control feature, teepee incinerators have only screens to retain some of the larger particulate. Only four of our approximately 60 municipal incinerators have designs which can be expected to improve air emissions any degree above that of teepee incinerators; and then emissions would still far exceed the Municipal Incinerator Emission Guidelines of the Canadian Council of Ministers of the Environment.

Compliance with those Guidelines would require capital investment of at least \$10 M in each case (compared to \$1.5 M for a typical pit incinerator and \$0.2 M for an average teepee incinerator). Operation costs would also be higher. The Department of Environment and Lands has therefore taken the position that these Guidelines will be applied only to municipal regions with populations of more than 50,000.

In recent years the percentage of plastics in the municipal waste stream has been increasing (meaning potentially higher levels of harmful emissions) and the public is increasingly concerned about air emissions. Therefore it has been decided that **teepee incinerators may be approved for use only where alternative methods of waste disposal are not feasible** (see attached memo dated 1993 01 14 and press release dated 1993 01 26).

It must now be decided when to apply this Policy and what process will decide when "alternative methods are not feasible." In the long term this can be decided through the development, with public input, of a comprehensive waste management strategy for the province as committed in the Strategic Economic Plan. However, for the interim the following Policy is suggested to define "feasible" and appropriate exclusions.

Policy:

For purposes of determining whether the Department of Environment and Lands should approve teepee incinerators on the basis that other alternatives are not feasible, and where common sense does not dictate this to be the case (such as for isolated communities in very rugged areas of the province); a proponent will be required to submit a feasibility study by a qualified consultant showing an itemized accounting of the difference in capital cost and annual operating costs for alternative system(s) and for a system including an incinerator. If the difference in the total costs for the life of the system (generally at least 20 years but, in no circumstances to be less than 15 years) is less than \$50 per capita per year, incineration will not be approved. The standard terms of reference for consultant for waste management systems (as developed by the Department of Municipal and Provincial Affairs and as attached) will be the terms of reference for such study reports which will be evaluated by a committee of:

- the Director of Municipal Engineering Services,
- the Director of Environmental Investigations,
- the Assistant Deputy Minister (Environment), and
- the Assistant Deputy Minister (Local Government)

before a recommendation is brought to the Department's Waste Management Committee and to the Minister.

Other exception for which teepee incinerator Approvals may still be issued without such a study being submitted are:

- 1) Waste disposal sites serving populations greater than 5,000 or located in a Special Area must be registered as an undertaking under The *Environmental Assessment Regulations*. If a EPR or EIS is required, the issue should be resolved in that process.

2) An Approval may be issued as a renewal in cases where the Certificate of Approval has expired although the incinerator structure remains sound and the facility has remained in use.

3) Systems that had funding approved by the Department of Municipal Affairs prior to the press release (January, 1993) even though application may not have been made to the Department of Environment and Lands, or if application had been made but processing was outstanding