



## TOWN OF PINCHER CREEK

962 St. John Ave. (BOX 159), PINCHER CREEK, AB. T0K 1W0

PHONE: 403-627-3156 FAX: 403-627-4784

e-mail: [reception@pinchercreek.ca](mailto:reception@pinchercreek.ca)

web page: [www.pinchercreek.ca](http://www.pinchercreek.ca)



July 18, 2017

Environment and Parks  
Regulatory Approvals Center  
5<sup>th</sup> Floor, 9915 – 108 St.  
Edmonton, Ab. T5k 2G8

Dear Sir/Madame,

Re: Crowsnest/Pincher Creek Landfill Association application # 009-18701

The Town of Pincher Creek would like to submit a statement of concern regarding the Crowsnest/Pincher Creek Landfill Association application # 009-18701, adding an incinerator to the landfill license to operate.

The Town of Pincher Creek represents 3650 people, and is situated approximately 17 km. due east of the Landfill properties. The Town is downwind and downriver from the landfill facility, as are the Town's water sources, the Castle River and the Pincher Creek. As Alberta Environment and Parks is very aware, being downwind means that we are regularly receiving whatever air mass forms west of us, via our strong southwesterly winds.

The Town Council has several concerns and/or questions regarding the proposed incinerator, as follows:

\*Air Quality/particulates – the Town is aware of only one incinerator component being considered by the landfill association – what other options have been considered, and have we received adequate assessment of the system proposed and the level of emissions anticipated?

- has an assessment been done on the ambient air quality when diseased animals are incinerated, such as carriers of BSE, and wasting disease, not to mention the level and toxicity from the pharmaceuticals used to treat sick animals prior to their death?

\*Water Quality – are the water streams east of the landfill going to be monitored on the levels of toxicity derived from air particulates and ground water run-off which will be derived from burying the final, remaining ash after incineration into the landfill?

\*Soil contamination – will a baseline test of the soil contents in a 10, 20 or 30 km. radius be conducted for further regular tests, to determine levels, if any of contamination?

\*Odor – burning of animal carcasses, hair, treated wood and plastics usually results in offending odors, will there be a permeating smell downwind of the proposed incinerator for residents to contend with?

The Town is a partner in the Crowsnest Pincher Creek Landfill Association, the board however has a weighted voting system with one community having three votes, and the others having one vote each. In this instance with two partners for and two against, the project may still move ahead. We are not

sure if all members of the landfill board are aware of the level of concern from local residents. Three of the members represent the Crowsnest Pass which is west of the landfill, where they are not regularly subjected to the prevailing winds. Residents in that area are not likely to be as affected or concerned as residents to the east. Given this scenario, the Town of Pincher Creek Council strongly requests that an independent Environmental Impact Assessment and a Public Hearing Process be conducted prior to any approval being considered. In addition, the Town recommends that a baseline test for both soil and water content be conducted, to enable future monitoring.

The Town is aware of other options available to dispose of animal carcasses; Lethbridge Rendering will pick up dead livestock in the rural bear zone for free (to the owners), and others for a fee; and an additional Lethbridge company has applied for license to dispose of deceased farm animals and anticipates their approval this summer. There is also a practice of disposing of "road kill" in remote areas for wildlife, to detract from bears, etc. searching for food in populated areas.

In addition, members of the Town Council and other local residents are aware of several options for recycling of baler twine and silage bags.

With other options being available to southern Alberta residents, we question how an incinerator, with the potential of releasing toxic air particulates for others to breath and or consume fits with the Provincial Governments focus on carbon dioxide emissions?

The Province, and Alberta Environment and Parks have also focused on the designation and development of the Castle Provincial Park and the Castle Wildland Park as a major tourism attraction. How will the transport of dead carcasses appeal to our local, national and international visitors? The application in fact states that animals from "Alberta and British Columbia" may be accepted? The residents and visitors of Pincher Creek and area will be the recipients of such action and process.

In closing I would like to reiterate that the Town is requesting an independent Environmental Impact Assessment, and a Public Hearing on the proposed incinerator application. Although public engagement opportunities took place in September 2016, many local residents did not feel that their concerns were given due consideration. The process appears to have a foregone conclusion, and was not seen to be open and transparent. Resident's should be given an opportunity during a public meeting to share their concerns and objections, if applicable with the Crowsnest Pincher Creek Landfill Board. I trust that the Department of Environment and Parks will provide for a proper analysis, and an opportunity for the local area residents to be heard.

Sincerely,



Mayor Don Anderberg  
Town of Pincher Creek

cc. Minister Shannon Phillips – Alberta Environment and Parks  
cc. Ping Zhao– South Saskatchewan Region