

## Department of the Environment and Local Government

# OPERATIONAL PRACTICE FOR THE EVALUATION OF C&D DEBRIS DISPOSAL SITE APPLICATIONS

### Background

The environmental risks and impacts associated with disposing of a given quantity of construction and demolition (C&D) debris at a single site are recognized as being significantly less than those associated with disposing of the same quantity at several sites. Thus, there are environmental and risk management benefits associated with reducing the overall number of sites available for C&D debris disposal.

In addition to the risk reduction benefits, the Department has identified a number of indirect environmental benefits that are made possible by concentrating C&D debris disposal at a limited number of sites. These benefits include, but are not limited to:

- 1) Facilitating voluntary waste diversion programs by providing the necessary economies of scale to make recycling efforts feasible;
- 2) Reducing the incidence of illegal dumping of C&D debris;
- 3) Increasing the efficiency of Departmental compliance monitoring; and,
- 4) Providing for improved environmental protection.

The Department recognizes that, within some Regional Service Commission boundaries, C&D sites have concentrated in some areas and they may not offer reasonable access to the general public. Consequently, the Department has decided that additional sites may be allowed under exceptional circumstances. In these cases, the proponent must demonstrate, beyond the existing requirements and setbacks for the sector, that their proposed site is needed based on criteria such as location, occurrences of illegal dumping of C&D debris, public accessibility, history of land reclamation applications, departmental compliance, and any other rationale for the site.

### Approach

The Department limits the number of C&D Debris Disposal Sites by restricting the number of Approvals to Operate granted based on population levels within each Regional Service Commission boundary. As each region should have access to a C&D Debris Disposal Site, each region will be eligible for one (1) site regardless of population size. Based on historical trends and experience, a population of 35,000 has been identified as the minimum needed for efficient operation of a C&D Debris Disposal Site. As such, a population of 70,000 will be needed in a region before it will be eligible for a second site and, another site will be warranted for every additional 35,000 persons in the region thereafter.

That is, in a region with 0-69,999 persons one (1) site can be approved. Two (2) sites can be approved in regions that have 70,000 – 104,999 persons; three (3) sites can be approved in regions that have 105,000-139,999 persons, and so on.

The total number of sites permitted in each region is indicated in the attached Appendix A. A map of the Regional Service Commission boundaries is found in Appendix B. Sites holding a valid

Approval to Operate will not be affected, regardless of the current number of sites in a given region. Potential applicants should contact the Authorizations Branch of the Department for the number of C&D Debris Disposal Sites available within each regional boundary.

Applications for C&D sites above the allowable limit for each Regional Service Commission will be evaluated on additional criteria. These criteria include, but are not limited to: location, occurrences of illegal dumping of C&D debris, public accessibility, history of land reclamation applications, departmental compliance, and the rationale for the site. Approval of these sites will be at the discretion of the Minister of Environment and Local Government.

## **Purpose**

The purpose of this document is to establish a procedure for the Authorizations Branch of the Department to evaluate applications for C&D sites in areas where the allowable limit, based on population, has been reached or has been surpassed.

## **Evaluation Procedure**

The Authorizations Branch will ensure the proposed application meets all siting and application requirements.

The additional criteria to be used to evaluate C&D site applications, for Regional Service Commission boundaries at or above the allowable limit, are listed below:

- 1) Distance to a regional landfill without a C&D site and neighbouring C&D sites**  
A proposed C&D site that is located further away from a regional landfill without a C&D site or neighbouring C&D sites will receive a higher evaluation.
- 2) Distance to receptors identified in the siting guidelines**  
A proposed C&D site that exceeds minimum siting requirements will receive a higher evaluation.
- 3) Number of land reclamation applications in the area**  
A proposed C&D site that is located in an area that has had numerous land reclamation applications will receive a higher evaluation. The number of land reclamation applications will demonstrate a need for a C&D site.
- 4) Number of incidents of illegal dumping of C&D debris in the area**  
A proposed C&D site that is located in an area that has had numerous incidents of illegal dumping of C&D debris will receive a higher evaluation. The number of illegal dumping occurrences will demonstrate a need for a C&D site.
- 5) Number of C&D sites existing in the Regional Service Commission boundary**  
A proposed C&D site in a boundary with fewer sites over the allowable limit will receive a higher evaluation.

**6) Public accessibility**

A proposed C&D site that is accessible to the public will receive a higher evaluation.

**7) Public accessibility at existing landfill and C&D sites within 30km**

A proposed C&D site will receive a higher evaluation if any existing landfills or C&D sites within 30km do not allow reasonable public access.

**8) Departmental compliance**

A proposed C&D site will receive a higher evaluation if the proponent has a history of compliance with Departmental regulations and policies.

**9) Sound argument of need**

A proposed C&D site will receive a higher evaluation if the proponent has demonstrated a need for an additional site.

Once the Authorizations Branch has evaluated the application with the additional criteria mentioned above, a C&D Debris Disposal Site Approval to Operate may be issued.

**Effective date**

This operational practice is effective as of May 2019.

**Inquiries**

For more information on the disposal of construction and demolition debris in New Brunswick, please contact the Authorizations Branch of the Department of the Environment and Local Government.

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**APPENDIX A**

The following table indicates the number of C&D Debris Disposal Sites allowed based on population limits for each proposed Regional Service Commission Boundary as shown in Appendix B. This table is based on currently anticipated Regional Service Commission boundaries and may be subject to change.

<b>Regional Service Commission Boundaries</b>	<b>Population (2016)</b>	<b>Allowable Sites based on population <sup>(1)</sup></b>
<b>1</b>	47,053	1
<b>2</b>	25,394	1
<b>3</b>	35,110	1
<b>4</b>	48,098	1
<b>5</b>	37,125	1
<b>6</b>	30,572	1
<b>7</b>	178,741	5
<b>8</b>	29,005	1
<b>9</b>	115,623	3
<b>10</b>	28,724	1
<b>11</b>	129,484	3
<b>12</b>	34,009	1

*<sup>(1)</sup> Based on the Minister's discretion, more sites may be allowed in a region*

These limits are based on 2016 Census data and may change in response to population variations in the future.

**APPENDIX B**

## Regional Service Commissions Commissions de services régionaux

