

SMART *Remediation*

QP Perspective on Excess Soil Reuse



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Excess Soil Quality Standards

- Excess Soil Quality Standards (ESQS) much more conservative than Site Condition Standards (SCS) from Ontario Regulation (O. Reg.) 153/04.
- Understood that conservative due to no groundwater monitoring or soil vapour measurements.
- In some cases, too stringent for reuse:
 - i.e., Petroleum Hydrocarbons (Fraction F2);
 - Disposal at Landfill
- Geotechnical Quality.
 - Ontario soil variations “dog’s breakfast.”

Reuse Sites

- Beneficial Reuse:
 - Limited Opportunities
- Pits & Quarries Rehabilitation:
 - Need a significant amendment for any meaningful increase
 - Or relinquish the ARA license and municipal approvals
 - NIMBY-ism;
 - Electrical Conductivity/Sodium Adsorption Ratio (EC/SAR) issues
 - Beneficial Reuse Assessment Tool (BRAT) limited reuse success

Municipal Soil Recycling Campus

- Infrastructure Projects:
 - Space and timing issues for project reuse
- Concepts of Local Waste Transfer Facility
- New depot types in recent amendments should help
- P3 models for campus operations
- Reduce needs for virgin aggregate purchase

Enforcement

- Many amendments, changes, and pauses since 2019
- Confusion within the industry
- Program credibility
- Will get industry attention when fines/charges and reputation are at stake
- Source Site Regulation ... focus
- RPRA Registry use

