

sites would be remediated, it is likely that some sites will be determined to have contaminants at such a level that the sites will require remediation. As a result, there will likely be significant expenditures for site remediation.

Government does not have complete and accurate information available on its landfill sites to determine the status of each site for use in planning, implementation, and monitoring of these sites. For example, although a number of the waste disposal sites are nearing the end of their useful life, there is no information readily available to identify when these sites will expire or what alternate course of action will be taken when the sites expire. A consultant was engaged in September 2004 to gather information and assess and classify existing waste sites in the Province and a report is expected by December 2004.

2.14 Used Tire Recycling Program

In April 2002, the Multi-Material Stewardship Board (MMSB), on Government's direction, implemented a Used Tire Recycling Program which currently operates under the authority of the *Waste Management Regulations, 2003* of the *Environment Protection Act*. Under these *Regulations*, used tires are no longer permitted to be disposed of in landfills throughout the Province. The goal of the Used Tire Recycling Program is to collect and process used tires in the Province.

The Used Tire Recycling Program since its inception in April 2002 could not be considered a success as it has not met its goal of collecting and processing used tires in the Province. For example, collection sites were not established in all areas of the Province, not all tires were collected from retailers and other sites, not all collected tires were processed, and not all processed tires were marketed and sold.

As at 31 October 2004, there are approximately 1.3 million passenger tire equivalents stored in five locations throughout the Province (including 461,965 in passenger tire equivalents stored and owned by a former MMSB contractor at the contractor's site in Stephenville).

This situation could result in considerable environmental damage if the tires became ignited. While MMSB officials indicated that the tires located at the Placentia storage yard are stored in accordance with guidelines established by the Department of Environment and Conservation and the Fire Commissioner's Office, those stored at Bull Arm and at the former contractor's site at Stephenville are not.

As at 7 June 2004 when the MMSB assumed direct responsibility for the Used Tire Recycling Program, there were approximately 1,015,000 passenger tire equivalents stored at Transportation and Works depots, Municipal Waste Disposal Sites, contractor's collection sites, retailers, Bull Arm, and at the contractor's site in Stephenville (stored and owned by the contractor). MMSB has indicated that the cost of tire recycling has increased as a result of their assuming direct responsibility for the Program. Between 7 June 2004 and 31 October 2004, MMSB collected over 212,000 used tires (551,000 passenger tire equivalents) from Transportation and Works depots, Municipal Waste Disposal Sites, contractor's collection sites, and retailers throughout the Province and stored these tires in designated storage yards.

The cost of collecting and storing these approximately 212,000 used tires was \$672,500 or \$3.17 per tire consisting of \$441,200 or \$2.08 per tire in collection costs and \$231,300 or \$1.09 per tire for storage. While the mix of tires is normally split 92% small tires and 8% large tires, MMSB officials indicated that the 212,000 tires collected are comprised of 60% small and 40% large. As a result, the fee that would have been paid to the former contractor to collect these tires would be \$2.70 per tire. While MMSB's collection cost of \$2.08 per tire is less than the \$2.70 that would have been paid to the former contractor, the interim cost of \$1.09 per tire to store the tires means that the overall cost of \$3.17 per tire is greater than the \$2.70.

In addition to the 1.3 million passenger tire equivalents stored at 31 October 2004, an additional 220,000 (290,400 passenger tire equivalents) in newly generated used tires are expected to be collected from retailers and individuals from 1 November 2004 to 31 March 2005. Although the MMSB has not finalized how it will address processing and disposing of all these tires, it has announced its intention to issue a "call for proposals".