

**ONEIA**

Ontario Environmental Industry Association

**Meeting the Soil  
Management Challenge**



**TERRANOVA**  
ENVIRONMENTAL SERVICES INC.

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## Meeting the Soil Management Challenge



## ADOPTION OF BMP'S AND POTENTIAL ISSUES

1. Procurement - As uptake of the BMP's or portions of them begins, it will take time for the industry to develop the requirements specified in them (i.e. FMPs/SMPs);
2. Size of Project – BMP's are specified for large construction or development projects. What is large? (1,000 m<sup>3</sup> = 100 triaxle loads = one day of bulk excavation);
3. Nature of Project – BMP's are for excess construction soils but as a receiving site pits, quarries, registered landfills are exempt. What about farms, subdivision development, soil amendment producers, road construction? (BMP's may become part of the permit process);

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4. Liability – excess clean soil is not a waste. BMP's drive due diligence to owner, contractor , QP's and receiving site;
5. Technical Requirements – difficult to meet and limits reuse options (i.e. Invasive Species and Like to Like sites);
6. Standards – current practice is to use the Regulation 153 standards where the BMPs stipulate that these are not intended for excess clean soil management. It is unlikely that stakeholders would stop using these standards since they are so widely accepted and are integral in development projects.

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## FUTURE CONSIDERATIONS

- Current practices will have to adapt to public and regulatory pressure to promote responsible excess clean soil management.
- In order to meet these requirements, the management of excess clean soils will have to be part of the initial design process when considering development projects.
- Owners and consultants will have to properly assess, characterize, and establish associated risks with soils prior to procurement. Characterization will have to incorporate soil disposal/reuse options.
- Ultimately, final reuse/disposal locations may have to be determined prior to procurement.