

TEXTILE MILL EFFLUENTS

Comments on the CEPA PSL2 Draft Assessment Report on Textile Mill Effluents were provided by:

1. Canadian Water and Wastewater Association, Gloucester, Ontario
2. Clariant Canada, Inc., St. Laurent, Quebec
3. Canadian Textiles Institute, Ottawa, Ontario.

Comments and responses are summarized below by Environment Canada.

Comment ^(submitter)	Response
<p>Based on the observation that the problems associated with textile mill effluents are site specific, and for the most part are, or could be addressed by municipal, provincial, or territorial approvals or controls, that many of the compounds of the mill effluents are controllable through conventional wastewater treatment, can the designation of "toxic" under the <i>Canadian Environmental Protection Act</i> be delayed for 24 months to allow the industry, in cooperation with federal, provincial, and municipal, regulatory agencies to develop a plan for the comprehensive management of textile mill effluents either through on-site treatment of the effluents or through municipal wastewater treatment plant technology and processes? ⁽¹⁾.</p>	<p>Although CEPA 99 makes provisions for suspension of the assessment period for Priority Substance List, this can only be done when the provision of new information is required to complete the assessment. The suspension is not intended to allow time for development of control or preventative actions. The Act now requires that preventative or control actions be developed within 24 months of the designation of the substance as "toxic" and a further 18 months to implement these actions. In the case of the textile mill effluent assessment, there is presently adequate information to come to a conclusion on its environmental risk and, therefore, there is no provision to delay the declaration. The stakeholders and experts will be consulted during the risk management phase to determine the appropriate control or preventive action under CEPA 99.</p>
<p>The assessment recommends particular attention be paid to the use and release of nonylphenol and its ethoxylates in risk reduction strategies, which seems to be inconsistent with the whole effluent approach of the assessment. ⁽²⁾</p>	<p>Although the overall risk of the textile mill effluents is adequately quantified on a whole effluent basis, there were data which became available during the course of the assessment, primarily as a result of a concurrent assessment that was being done on nonylphenol and its ethoxylates, which allowed for risk estimates to be derived for that component of TMEs. It is believed that inclusion of that estimate of</p>

	<p>risk contributed to the weight of evidence of the risk characterization and provides some direction for the subsequent risk management effort.</p>
<p>The key assessment used a data set for entry characterization which was based on a questionnaire for which there were certain data gaps. What were those gaps, and how were they addressed?⁽²⁾</p>	<p>Although the overall response to questionnaires sent to textile mills in Canada was very good (100%), all questionnaires were not fully completed. The only extrapolation that was done for entry characterization involved the mill type categorization, where 7% of mills did not identify what process they conducted.</p>
<p>The assessment was based on certain data, such as that for toxicity, which appeared to be highly variable and, therefore, may unfairly characterize all textile mill effluents.⁽²⁾</p>	<p>The assessment determined and acknowledged that textile mill effluents vary substantially in their properties on a temporal basis. In order to reduce the effect of that variability, mills were categorized according to their manufacturing and operating and according to their level of treatment. Wet processing categories did not differ substantially in their toxic effect; however, there was a marked difference in the toxicity of effluents receiving different levels of treatment. In quantifying the risk of different levels of treatment using quotient methods (Tier 2), the median toxicity values were used and for the weight of evidence quantification all toxicity values were considered.</p>
<p>Textile mill effluents (TME) should not be added, at this time, to the List of Toxic Substances in Schedule 1 of CEPA. However the balance of the recommendations contained in the concluding paragraph of the synopsis of the assessment report should be implemented.³</p>	<p>The assessment of textile mill effluents determined that there was sufficient evidence to propose that TME be considered “toxic” as defined by Section 64 of CEPA 1999. The assessment was reviewed by members of the Environmental Resource Group and by Environment Canada staff. In addition, no scientific information contradicting the proposed conclusion was received as a result of the public comment period therefore, it is felt that the proposed conclusion and the recommendation to add TME to the List of Toxic Substances are justified.</p>