

Lambton Facility Update

January, 2012

On-site Landfill Leachate Update

Over the last several months the Company has been actively working on measures to reduce the amount of leachate on-site. For the month of December the Company disposed of 5.5 million litres of leachate and as of January 17 was on pace for a disposal rate of 5.4 million litres of leachate for the month of January. The Company plans to have all of the leachate either disposed of, or covered in engineered leachate reservoirs, no later than May 31, 2012.

Two leachate reservoirs and the cover installation forms part of the Company's Leachate Abatement Plan. Both reservoirs will operate independently which will allow flexibility with regard to construction, cover installation, and management of the leachate reservoir system.

The pond covers are made of high density polyethylene (HDPE). HDPE is an excellent lining material and is the most widely used for this type of floating cover application. HDPE has high tensile strength along with good chemical resistance and offers very reliable containment. The material's high ultraviolet and chemical resistance as well as its flexibility makes for a longer lifespan for lining projects and superior protection to aging and degradation. The life expectancy of an HDPE liner is dependent upon the environment in which it is installed. In buried applications such as a solid waste landfill, the life expectancy can be up to 200 years. In an exposed application such as a floating cover, the life expectancy can reach 20 years.

Clean Harbors has retained Terrafix to install the leachate pond covers. Terrafix is Ontario's largest geosynthetic contractor with HDPE material in stock and their crews work predominantly in Southern Ontario within five hours of the Lambton site. Clean Harbors has established an emergency mobilization service agreement with Terrafix to service and repair the site's leachate pond covers as needed. In the event of any damage to the two installed floating covers for the east and south leachate reservoirs, Terrafix would be contacted immediately to conduct repairs. Terrafix would consider this an emergency and their response time will include weekend work as well as holiday work.

The new east leachate reservoir will have a rated capacity of 14,833,000 litres while the refurbished and covered south leachate reservoir will have a rated capacity of 5,505,000 litres. Once both reservoirs are completed and full, the Company will be conducting a detailed reassessment of the leachate volumes. It is expected that the transfer of approximately 20 million litres of leachate will have a major impact on leachate levels in the active cell. Upon completion of that assessment, the Company will then update the Leachate Abatement Plan to reflect the new estimated volumes and evaluate any changes to the Plan that may be necessary based upon the updated information.

Presently, the company is implementing plans that could effectively reduce the catchment areas by as much as 50 percent. Reductions to the leachate catchment areas have a major impact on leachate generation amounts. Once these catchment modifications are completed leachate generation rates will be assessed to ensure the Leachate Abatement Plan is accurately considering this variable in leachate calculations.



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To ensure it meets the May 31 deadline, the Company has increased the leachate destruction rates in the on-site incinerator. In order to achieve higher rates the company has installed a temporary leachate pre-treatment system to reduce the organic levels in the leachate and displaced customer waste to an equivalent of 1,000,000 litres per month.

On December 22, 2011 the Ministry of the Environment (MOE) issued a Directors Order to the Company to complete in summary the following items:

1. Incinerate no less than 5.2 million litres of leachate per month.
2. By the fifth day of each month, submit to the ministry the following:
 - a. Total amount of leachate incinerated for the previous month;
 - b. Total amount leachate incinerated on each day of the previous month; and
 - c. Estimated volume of leachate at the working face for the end of the previous month.
3. By the 20th day of each month shall notify the ministry if the leachate incineration requirements of Item No. 1 cannot be complied with.
4. Shall be allowed to incinerate up to 1 million litres less than the required 5.2 million.
5. If at the end of any the month the incineration total is less than 4.2 million litres, the difference between the amount incinerated and 4.2 million litres shall be removed from the site within 28 days of the end of the month in which the short fall was generated.
6. Monthly incineration volumes may be reduced upon written consent of the ministry.
7. By January 31, 2012 east leachate pond to be

completed.

8. By January 31, 2012 south leachate pond to be completed.
9. By February 2, 2012 submit a written contingency plan detailing the steps to prevent off-site odour impacts in the event of a leachate pond failure.
10. By December 30, 2011 submit approval application for the leachate pond vents.

Clean Harbors is confident that with the operational changes mentioned above, we will be able to meet the 5.2 million litre per month destruction rate.

