

MEMO

Date: February 6, 2003

To: David Ohashi, Manager Special Projects

cc: Alan Elgar, Kevin Flynn

RE: Mid Halton Waste Water Treatment Plant Expansion

By: Grace Arcaro and Ross Boncore (1562 Stoneybrook Trail), L6M 2R6

Grace and I have attended both the Nov., 14, 2002 and the Jan., 29, 2003 public meetings. We also have reviewed the Mater Plan Review (MPR) and we have concluded that more time is needed for the residents of Glen Abbey and the rest of Oakville to consider the consequences of expanding the Mid Halton WWTP. We are suggesting that the time limit be expanded 120 days.

Our reasons for requesting an extension are that more time is needed:

- To study the MPR
- To complete further studies that are needed
- For others to acquaint themselves with what is a very complicated issue. Although an extension has already been granted it came in the middle of Christmas so that awareness of the issues was minimal.

More detailed comments:

2. according to section 2.1.1. of the Master Plan Review (MPR), the purpose of the environmental assessment is “to examine and document the environmental affects which might result from major projects or activities.” It appears that Halton Region has interpreted this primarily with regards to disruption to land and animals during or after construction as these considerations appear time and again in discussing each alternative. The plan fails to discuss the effects that the expansion to the Mid Halton plant will have on:

- 1.1 Odours
- 1.2 Airborne toxins
- 1.3 Land Values

It is true that a discussion of 1.1 was presented at the Nov 14, 2002 public meeting but this

discussion is not in the MPR. It appears that the issue of odours was considered only as an after thought and then only superficially. **All issues 1.1, 1.2, and 1.3 require much further study and should take into consideration, for example, actual health effects experienced by children/ residents/citizens living in proximity to a plant similar in size to the Mid Halton plant after the proposed expansion**

3. At the November 14, 2002 meeting, residents inquired about how the wind direction surrounding the Mid Halton plant was determined. The Region indicated that only one study was done and at one point in time only. The issue of wind direction is very important as it determines the area affected by odours and airborne toxins. **For example, if the wind direction is indeed from north-west to south east, the residents living in south west Oakville should also be made aware of the intended Mid Halton expansion as they are going to be as affected as much as Glen Abbey residents.**
4. If the regions plans to carry out more wind direction studies, they will not be completed until another year passes. **The information will then be too late. More study of wind direction is needed before the completion of phase 2.**
5. At the public meeting held on Jan. 29, 2003, it was clear that although not all the causes were known, the increase in near shore algae levels was directly related to the increase in phosphorous levels. For each alternative discussed in the MPR, there is no discussion supported by detailed studies of the effects increased phosphorous levels will have on algae growth in Lake Ontario. Rather one finds in the MPR—alternative after alternative—“Expansion of Mid Halton WWTP would have minor impacts resulting from increased discharges to Lake Ontario” and [..the effects] would be mitigated by developing effluent compliance criteria designed to take advantage of the assimilative capacity of Lake Ontario in compliance with provincial standards” **More studies are needed regarding the levels of all effluent components that will be discharged into Lake Ontario and their effects.**
6. What are the provincial standards for discharges into Lake Ontario? When were they set? Do these levels have little or no health hazards associated with them? The Hamilton region has passed a Remedial Action Plan (RAP) regarding the flow of effluent into Hamilton Harbor. This RAP places stringent requirements for the clarity of effluent. **The region should set similar standards before Lake Ontario becomes as bad as Hamilton Harbor. Stringent requirements need to be developed in connection with the effluent flow from the proposed Mid Halton expansion. These should be designed to prevent the growth of near and offshore algae. The standard should be based on what it takes to keep Lake Ontario safe and clean. The Provincial Standard should be used only if it meets this objective.**

7. One of the strengths advanced by the MPR is the natural buffers that exists at the Mid Halton Plant. The region also documents that no odour problems have been reported since 1991 when the plant opened. The fact there have not been any complaints does not testify to the effectiveness of the existing natural buffer. Even a polling of current residents would not be very helpful as the odour levels will be significantly higher when the plant is fully expanded. **Again, studies should be prepared by comparing expected post expansion odour levels and air borne toxins with those that arise from an existing plants similar in size. After such a study, an assessment should be made of the ability of the existing natural barrier to mitigate these odours and toxins.**
8. The treatment of bio-waste solids is left for the next phase of the Class EA. How can this issue be separate from the expansion issue? Where are these bio-waste solids going to go? Is there in fact a market for them? Will they be disposed of in Halton to maintain an all Halton solution? **Existing studies should be consulted regarding the effect of bio-waste disposal on citizens and their environment. Even if the bio-wastes are transported out of Halton, this is no solution. Does Halton want to contribute to the health risks of other citizens? A comprehensive study is required regarding the disposal of bio-waste solids.**
9. Even if Mid Halton WWTP traffic is limited to the QEW and the north service road, risks associated with spilled chlorine, cement dust etc is still ever present. Residential homes are located well within the 1.5 km radius quoted at the Jan. 29, 2003 meeting. **The effects of accidents associated with effluent treating materials should be investigated and a study prepared.**
10. It may be more cost efficient in terms of bricks and mortal dollars to have one big plant at Halton but the risks to residents and environment may well be too high. And what about the dollars associated with the health risks. **Just because these dollars are harder to calculate it does not mean they are any less important or real. Does any councillor for the region or any staff member at the region wish to move within the residential areas near the Mid Halton Plant?**
11. The Region's handout's indicated land for the Mid Halton plant was purchased in 1980. This purchase included a process that was open to public comments. However, what was the population of Glen Abbey in 1980? Very few! (I know my street wasn't built until 1987). This is a central flaw with the planning of the Mid Halton plant. At the time

12. when this all began there wasn't much of a public to comment on the plans for the Mid Halton plant. Thus, we are now being asked to comment on a bricks and mortar decision that was made without us. Our position is especially difficult since the Mid Halton plant was purchased and developed with a view to expansion. Irregardless, flaws in planning should be corrected. **No expansion should take place until all of Glen Abbey and the rest of Oakville have time to deliberate the consequences of the expansion.**
13. Given that the Mid Halton plant is to receive waste water from commercial, residential and industrial sources for such a wide area, would it not be better to build smaller WWTP's so that we are able to identify and restrict more easily the waste water components? This approach would also lend itself to distributing the waste water plants to different areas and minimize the health risks. **A multiplant alternative (over and above those discussed in the MPR) should be considered as an alternative to the expansion of the Mid Halton plant alone.**
14. What will the processing technology be for this phase of expansion? We were unable to find a presentation of the alternative ways of treating the sewage and why each alternative was dismissed for the preferred alternative. It is not in the MPR. In the meeting (jan29) Zenon technology was mentioned yet we don't know anything about it. It is not very helpful to explain that the processing technology will be discussed at the next phase of the the environmental assessment as this issue has great ramifications at the phase we are currently in. **No expansion should take place until processing technology is discussed, finalized and approved by the public.**
15. What are the benefits to Oakville in taking Milton's sewage? We would be required to live with the risks (ie: poor air quality, health, possible chemical spills) of being near a sewage treatment plant while Milton's property values increase. They should build their own plant. If its more expensive, then that expense should be born by Milton in their wastewater charges, and if that is not possible then they should relook at their growth plan.
16. Our understanding is that there are currently 2 open sewage tanks. With the proposed expansion will there be a greater number of open sewage tanks , and if so how will this affect odour levels?
17. Given the complexity, the number of issues and the short time frame for discussing them we feel that it is important to establish a citizen's committee to allow for further research and citizen participation at all levels of the decision making process. Glen Abbey residents

need a mechanism whereby they are kept informed of what is going on as well as one which will take their input into consideration. **This citizen's committee should be established first and foremost before any other steps are taken.**

Conclusion:

After attending the meeting and reviewing the MPR there are many unanswered questions and very serious concerns that need to be addressed before moving to the next phase and for this reason we recommend that the deadline date be extended 120 days or longer if so required by the studies contemplated by the above comments.

We would like to thank Allan Elgar and Kevin Flynn for hosting the meeting on Jan 29 whereby we learned of some of the issues and we look forward to your response. We would greatly appreciate a copy of the "consolidated response" once completed.

Concerned Citizens

Grace Arcaro _____ Ross Boncore