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January 18, 2002

The Honourable Elizabeth Witmer  
Minister of the Environment  
12<sup>th</sup> Floor, 135 St. Clair Avenue West  
Toronto, Ontario  
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Dear Minister Witmer:

**Re: Comments on MOE proposals regarding emissions to air in Ontario  
(EBR# PA01E0025 and EBR# PA01E0026)**

The Ontario Ministry of the Environment has recently released a number of decisions and proposals regarding the regulation of atmospheric emissions from the electricity sector and other industrial sectors. Several of the announcements contain positive changes, while others must go much farther if they are to be protective of air quality and health. As the Medical Officer of Health for the City of Toronto, I am pleased to offer the following comments on two recent air quality decisions and two MOE proposals.

### **Recent decisions affecting air quality in Ontario:**

#### **1. Fuel switching to natural gas at Lakeview Thermal Generating Station**

I am encouraged by the recent decision to terminate the burning of coal at Lakeview Thermal Generating Station in 2005 (EBR# RA01E0014). Switching from coal to natural gas is a great step forward, however I am disappointed that the Ministry decided not to reap the fuel-efficiency benefits to be gained from also switching to combined-cycle natural gas turbines.

#### **2. Environmental Assessment for SCR Installation at Nanticoke Generating Station**

Numerous municipalities, states and environmental and health organizations requested that an environmental assessment (EA) be undertaken for the installation of selective catalytic reduction (SCR) equipment at the Nanticoke coal-fired power generation facility. I am disappointed that the decision was made not to conduct an EA. Environment Canada has

identified Nanticoke as the third largest source of mercury in the country (on-site releases in 2000). Merely installing SCR equipment at Nanticoke without performing an EA represents a missed opportunity to improve Ontario's air, given that alternatives to coal-burning at Nanticoke are available, and given that SCR equipment will not prevent emissions of mercury or numerous other contaminants.

### **Initiatives proposed by the MOE:**

#### **3. Shortening of Sulphur Dioxide and Nitrogen Oxides Emission Reduction Target Date for Ontario to Improve Air Quality: EBR# PA01E0025**

I commend the MOE for shortening from 2015 to 2010, the timeline under which SO<sub>2</sub> and NO<sub>x</sub> emission reductions will be achieved. By 2015, Ontario has committed to reducing NO<sub>x</sub> emissions by 45% of 1990 levels and SO<sub>2</sub> emissions by 50% of the Countdown Acid Rain cap, under the Anti-Smog Action Plan (ASAP) and Canada-Wide Acid Rain Strategy for Post 2000, respectfully. I expect and respectfully request that a plan detailing how the accelerated emission reductions will be achieved will be developed with stakeholders in a timely manner.

#### **4. Emission Reductions from Ontario's Industrial Sources: EBR# PA01E0026**

I will address the three elements of this proposal:

##### **4A) Proposal to regulate emissions from Ontario's major industrial sources**

The Ministry's current proposal to cap NO<sub>x</sub> and SO<sub>2</sub> emissions from non-power generation ("other") industrial sectors that participate in Ontario's emission trading system would address a major area of concern in Regulation 397/01. This regulation allows the power generation sector to purchase emission reduction credits (ERCs) resulting from plant upgrades in other industrial sectors whose emissions are not capped. Consequently, if production in such uncapped sectors is increased, and ERCs are sold to facilities in the electricity sector, then overall emissions in Ontario could potentially increase over time. Strategically capping the emissions of the other industrial sectors engaged in emissions trading will help ensure that total emissions in Ontario are reduced.

As I described in detail in my letter dated August 30<sup>th</sup>, 2001 (re: EBR# RA01E0020), the electricity sector caps for NO<sub>x</sub> and especially SO<sub>2</sub> are too high to be protective of health. When setting emission caps and ERC-trading limits for the non-electricity sectors, the Ministry must ensure that overall emissions from all sectors are low enough to substantially improve air quality and protect the health of at-risk groups including children and the elderly.

I am also concerned that Ontario's system to cap emissions and trade ERCs may not satisfy the Ozone Annex of the U.S.-Canada Air Quality Agreement. The Ministry's highest priority

regarding emissions from non-electricity sectors should be to ensure that the magnitude and timeline of emission caps guarantee that Ontario will reduce its emissions and meet its international commitments. As the Medical Officer of Health for Toronto, I cannot overstate the importance of Ontario's compliance with the Ozone Annex. Poor air quality is estimated to contribute to 1,000 premature deaths and 5,500 hospitalizations annually in Toronto (Toronto Public Health 2000). Delivering on our international commitments is the best way to elicit similar emissions reductions by our neighbours to the south, and to reduce the human and economic costs of air pollution.

#### **4B) Proposal to review regulations governing sulphur in fuel oil and coal**

The Ministry's proposal to reduce small point source emissions from the burning of fuel oil and coal is a step forward. However, I am unable to comment further until the Ministry releases proposed timelines and quantifies the sulphur reductions that will be made. Reducing the sulphur content in fuel is a low-cost way to reduce the emission of hazardous sulphur compounds. By purchasing low-sulphur fuel, the City of Toronto estimates that it will reduce 2002 sulphur dioxide emissions from the City's fleets by over 50% for an additional cost of approximately 1%. I recommend that the Ministry pursue dramatic reductions in the sulphur content of fuel oil and coal in order to improve air quality.

#### **4C) Proposal to accelerate the implementation of codes of practice for reducing industrial VOC emissions**

Codes of practice can effectively improve environmental quality if mechanisms are put in place to ensure that intended emissions reductions are actually achieved. The reduction of industrial VOC emissions is an important objective, and I support the Ministry's proposal to accelerate this process.

I look forward to more positive announcements by the MOE, and I trust that in future the provincial government will take advantage of the great air quality improvement opportunities that are afforded by Ontario's power-generation and other industrial facilities.

Yours truly,

*Original signed by Dr. Sheila V. Basrur*

Dr. Sheila V. Basrur  
Medical Officer of Health

cc: Gord Miller, Environmental Commissioner of Ontario  
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