

Good morning Councillors,

As co-chair of the Highland Creek Treatment Plant Neighbourhood Liaison Committee, I have been living with this issue for more than six years. Throughout this period I have worked to help the residents of my community realize their expectations in relation to the management of biosolids at the Highland Creek plant.

As you will have heard, there is a very strong preference for the replacement of the existing 40 year-old multi-hearth furnaces with new state-of-the-art fluid bed incinerators, with advanced air emission controls.

You have heard today from many others about the clear recommendations in the new EA reports supporting this decision, so I do not intend to duplicate their comments.

Instead I would like to spend my few minutes talking about three issues;

1. Concerns about incineration - why burning sewage sludge is safer than burning municipal solid waste?

I would like to make the point that there are significant differences between municipal solid waste incinerators and sewage sludge incinerators. The composition of garbage varies considerably with each truckload, whereas as dewatered sewage sludge is a much more homogeneous material, that has a relatively uniform heating value. As a result, the incineration process is much easier to control, thereby ensuring complete combustion by maintaining stable high operating temperatures. As has been shown in the Air Quality Impact Assessment Report, the new fluid bed technology, will result in a significant reduction in the emission levels, compared to those from the existing multi hearth furnaces,

2. Why are we doing a new Biosolids Environmental Assessment?

The Highland Creek Biosolids issue was first discussed in 2002, when the City initiated the City-wide Biosolids Master Plan EA. Council voted twice on this issue, in 2010 and 2011, and in both cases chose not to accept the evidence-based incinerator upgrade solution, as recommended by staff and supported by the local communities, and instead opted to install the same sludge trucking solution that has been implemented at the downtown Ashbridges Bay plant.

Obviously, in Highland Creek there was strong local opposition to these decisions, and after much soul searching, and discussion with the Ministry of the Environment, the City decided to undertake a new Schedule B Biosolids Class EA, and that this time it would include an assessment of health impacts.

3. What is the EA process and how is it supposed to work?

The environmental assessment process has been in place in Ontario since the 1970s. The Municipal Class EA was started in the 1980s, and it contains the following definitions:

- It is a planning and decision-making process used to promote responsible decision-making.
- the environment is broadly defined to include natural, social, economic, cultural and constructed environments.
- a **Schedule B** undertaking includes consultation with all parties that may potentially be affected by the project to ensure that they are aware of the project and that any concerns are suitably addressed.
- the process should be open and transparent.

It is evident that biosolids management is a problem where there is no one solution that satisfies everybody. It is therefore essential that the environmental assessment process should weigh, in an open and transparent manner, all the different factors that come to bear on the decision-making process. The Highland Creek EA studies have clearly done that.

The only solution that suitably addresses the concerns in all four categories, namely health, environment, community, and cost, is Alternative 1.

However, it appears that some Councillors are intent on imposing the same solution that was implemented at the downtown plant. My concern is that trying to impose an unsubstantiated one-size-fits-all solution is inappropriate.

It is clear is that different communities have different perceptions. In the case of Highland Creek, the local residents are evidently comfortable with incinerators, since they have been operating satisfactorily at the plant for the last 40 years; we just would like to get the obsolete equipment replaced.

It now remains for you as decision makers, to consider these complex issues with an open mind, and listen to the scientists, listen to the health specialists, listen to staff, listen to the Community and its local Councillor, and then make an evidence-based assessment that is appropriate for our individual situation.

Thank you for your time.

Frank Moir
Co-chair Highland Creek Treatment Plant Neighbourhood Liaison Committee

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