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February 08, 2003

Mr. David Ohashi  
Manager, Special Projects  
The Regional Municipality of Halton  
1151 Bronte Road  
Oakville, Ontario  
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Dear Mr Ohashi:

I have now received your letter dated January 31, 2003. As I understand the text of your letter, you are formally acknowledging receipt of my comments/questions on the proposal to expand the Mid-Halton sewage treatment plant.

Since my comments were submitted at the November 14, 2002 Open House, I can only assume that your acknowledgement refers to my comments pertaining to that particular meeting, and does not pertain to comments arising from the January 29, 2003 meeting. I delivered additional comments & questions with respect to information discussed at the January 29<sup>th</sup> meeting by the “deadline” of February 07, 2003 via direct e-mail to you and presume that you will also be formally acknowledging receipt of these comments with a direct letter response.

I would appreciate knowing why it took so long to receive an acknowledgement to the questions and comments subsequent to the date of the meeting. Was there a process in place previously that was ignored, or was there a lack of structure with respect to dealing with public input.

As a consequence of the delay in receiving responses, I believe that the community is justified in seeking an additional extension to the comment process. It would appear to be arbitrary, & also unfair to adhere to the February 7<sup>th</sup> deadline when none of the questions posed at the November meeting have been answered in a satisfactory way. By not responding to the Community’s questions prior to the February 7<sup>th</sup> deadline it leads one to believe that you were only interested in fulfilling the obligation to “receive community input” rather than to “consider community input”. By not responding to people’s questions prior to the deadline and not making the process clear, you have tainted the process and residents now generally believe that “this plant expansion is being shoved down their throats without a genuine response to our concerns”.

After reading some of the recent articles/letters to the editor in the local press and also the Toronto Star, there appears to be a groundswell of opinion that the Community has not been properly notified of the plant expansion. This can only be failure on the part of the

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Region. Perhaps all the obscure notices were indeed filed, and your lawyers will tell you otherwise, however it is a fact that many people have had no notice and only found out because of the extra curricular efforts of a couple of our local representatives. If you want to remain true to the principal of Community input, it would appear that you would be obligated to extend the comment date and do a better job of notifying people what the plan is to be and what you are planning to do to address their concerns.

Your letter also indicates that staff will be “compiling” the questions, grouping comments by theme, responding to the comments and presenting them to the Planning & Public Works Committee on March 18<sup>th</sup> and then to Regional Council on March 26<sup>th</sup>.

Could you please provide me with an explanation of the process that these two organizations are then expected to follow with respect to the public comments and the staff responses? So far as your letter indicates, the process is to “present” a compilation of comments and responses. Does the submission of this report then lead to certain immediate decisions by Regional Council, or any further evaluation of the adequacy of the staff responses, or some sort of a “vote”, or perhaps further study, or is the current intention that this exercise be one of documenting the public responses and “checking the box” with respect to public consultation. Further explanation of the details of this process are required, and I would appreciate knowing whether I will personally be receiving a response to my questions that the Region has solicited by virtue of holding public meetings.

Subsequent to the January 29, 2003 meeting I received a hard copy of your November 14, 2002 presentation. This package unfortunately arrived after the date of the meeting and did not afford me the time to refresh my understanding of the regions position and to formulate additional questions on its contents, which then could have been discussed at the meeting. I am disturbed and distressed at the way the extension to the comment period has been handled and also how key information seems to arrive in a very untimely fashion or not at all. I am wondering if this is “strategy” or just “disorganization”. Accordingly I am documenting some additional questions here and would appreciate a response.

Your report indicates that the property was acquired in 1980. Accordingly this is an old plan, and we are dealing with “legacy thinking” at this point. Much has changed in the world since that time. Have there been updated studies with respect to the marginal costs of expanding this particular plant, versus the installation of smaller plants employing different technology, on smaller sites, that would be more suitable for handling the projected growth in Milton & the Halton Hills “401 Corridor” on a more local basis? These reviews of course would ignore the “sunk costs” of the 1980 decision, as any good economic analysis would. **If these types of cost studies have not been completed, why not, and if they have been completed, will you disclose the results to the public?**

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Your presentation indicates that the current site was selected with a number of objectives in mind, one of them being: “The site master plan that could accommodate servicing demands of future growth in Oakville and potentially Burlington (Alton) and Milton”. The underlined “could” is your emphasis. I assume by your wording and emphasis that this long range plan was conceived 22 years ago with a great deal of flexibility and with no thought that it “would” absolutely service Burlington and Milton – the underlined “could” being the operative word (rather than “would”) along with the very key word “potentially”. **What are the other site alternatives that were considered prior to launching the request for an additional expansion of this particular site? Did the Region explore the feasibility of other “potential” sites to service Halton Hills projected growth?**

This site is destined to be a large industrial installation that is surrounded by residential and recreational property. When the original selection was made 22 years ago, there were virtually no people living in Glen Abbey so it is safe to say that the selection was not a controversial one at the time. Also when the previous expansion was approved in 1992 the population was also considerably smaller while now there are many more families living in the area. **When the most recent engineering recommendation for this site was made, were there any local community members involved directly with the decision making process (other than the post decision process we are dealing with now). Do any of the senior staff that made the recommendation live in the area affected by their decision?**

As I understand the eventual size of the plant, production would top out at a capacity of 166,000 cu.m/day. This is an eight fold increase from present levels of production. **How would the size of this plant rank when compared to other plants in Southwestern Ontario or Metro. Would it be in the top ten, the top five, the top three?**

We also understand that the plant will be operating utilizing trucks to bring in chemicals and to accommodate the “bio – solids” program. Obviously this will require heavy use of Third Line and also Bronte Road. **Have the necessary studies been completed to indicate that such a large industrial installation can be effectively operated on this site without railcar service?**

Your presentation indicates that the plant “process includes a byproduct (bio – solids) after treatment process” Apparently this employs land application on farms throughout Halton, and a “program review is now underway”. **How extensive and successful has the plant bio-solids program been to date, and is this a generally accepted process throughout the rest of Ontario or is it experimental in nature? Is it possible that a rejection of this type of program may require the construction of a large incinerator in the neighborhood at some point in the future and has this course of action been considered by the Region, but not yet discussed with the community?**

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As I understand your presentation, the Phase 1 module was commissioned in 1991 and in 1992, almost immediately, a “preferred alternative” was settled upon to expand the plant to 50,000 cu.m/day. The second plant module came on line in June 2002. Over the last year the installation has been operating at approximately 20,000 cu.m/day, or at 40% of current capacity. Your presentation also indicates that “The model predicts that Odors have increased. The absence of odor complaints to date could correlate the findings (I infer here that findings are that there should be more smell than there actually is) are very conservative”. This seems to imply that while the odor study has been completed, that it is a worse case scenario and residents should not be troubled. Since the plant is only at **40% of current capacity, and 12% of total planned capacity**, how can the region draw any conclusions about odor other than there does not appear to be a current odor problem at 20,000 cu.m/day? **What is the budget in this next planned expansion for odor control? What was the budget in the last expansion for odor control and was that money actually spent? What is the evaluation of the most recent odor abatement processes and what organization regulates that process? What are the Provincial Regulations with respect to odor control? I would have similar questions about the level of phosphorous that is being discharged into the lake. Current operations of 20,000 cu.m/day are significantly less than 166,000 cu.m/day, yet we have a significant lake water problem. What is the plan to deal with this?**

Your presentation indicates that “failure to meet operating standards and requirements under the certificate may result in fines and prosecution (jail) for both plant operators and senior responsible officials”. **How far does this personal liability extend? Does it extend to Town of Oakville officials and/or Regional or Town politicians? Have there been any recent changes to these Regulations, procedures since Walkerton? What organization does the Regulating, and levies the charges – MOE or a local organization. What role does the MOE have in all of this?**

Could you please acknowledge receipt of this letter and advise when I may expect some answers.

Yours truly,

**Gary & Heather Wade**