

SUBMISSION TO CITY SERVICE COMMITTEE

MAY 12, 1989

RE: LAKEFILL QUALITY

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The Waterfront Remedial Action Plan Committee has addressed your Committee several times before, about our ongoing concerns with lakefilling and our concerns with the Metro Toronto Region Conservation Authority's interim lakefill program.

Since 1983 this city's Board of Health, Neighbourhoods Committees and City Council have made repeated recommendations to provincial and federal agencies to control the use of contaminated fill in lakefilling.

It has been the City of Toronto's initiatives that have led to attempts to control lakefilling and its environmental impacts. Those attempts have repeatedly failed because of the bad faith of other agencies. The Ontario Ministry of the Environment (OMOE) is the agency with responsibility for water quality. Now OMOE is evading its responsibility to control and assess the impact of lakefilling by passing the Lakefill Quality Program to the Conservation Authority.

It is time for us to step back and have a full evaluation of this polluting activity which is being carried out more in Toronto's waters than anywhere else in the Great Lakes.

Too many questions remain unanswered:

- \* Is lakefilling sustainable?
- \* Is there enough "clean" soil in Toronto to carry out the growing number of lakefill projects being planned?
- \* Are there alternative disposal sites for fill exceeding open water dumping guidelines?

\* Are there alternative construction practices that could be utilized to reduce the volume of fill for disposal?

All these questions would be answered by an environmental assessment of the practice of lakefilling. We recommend that the City of Toronto call on the Minister of the Environment to undertake an environmental assessment of the practice of lakefilling.

It is time the City takes all of the steps necessary to insure that its own activities, its road, sewer and utility projects conform to guidelines for disposal of fill in the Great Lakes.

The public has indicated time and again that it is willing to pay the increased cost of environmental clean-up. City utility, road and sewer projects should be subject to the same controls that developers are subject to.

Concerns have also been expressed about the increased testing and disposal costs for the little guy excavating his back yard. We recommend that the Works Department create a temporary depot for the single small loads to be collected. The City should then test those soils in order to ascertain their suitability for lakefilling.

To insure that the trucks now being turned away from fill sites are utilising recommended upland disposal sites, a way bill system should be instituted. Bills of lading should be issued to trucks as they are turned away and those bills should be collected at the disposal site so that there will not be any unscrupulous disposal of fill.

Since the last time this Committee considered this matter, there have been several strides made in controlling lakefill.

- \* A new study by the Medical Officer of Health examining alternative disposal sites for excavated materials has been passed by City Council. This study has led to the creation of an interagency committee answering to the Board of Health and Neighbourhoods Committee. They will be reporting their recommended options by July 1, 1989.
  
- \* The Toronto Harbour Commission at its April 25, 1989 meeting decided to accept only clean fill at the Leslie Street Spit fill sites. This decision rules out the MTRCA's suggestions to categorize and place fill according to its quality.
  
- \* The Ontario Ministry of the Environment soon will be releasing new criteria for lakefill and sediment which will have more extensive perimeters for testing which will likely include biological assessment of their impact. This means that the testing regimes will only become more expensive.
  
- \* The revelations made by the Globe and Mail this week, that fuel oil tainted with toxic chemicals including PCBs have likely been available to Ontario drivers for several years, have relevance to this discussion. Those of us who have been following the quality of soils at the Spit have been puzzled by the prevalence of PCBs in soils tested. Since PCBs have been "controlled" for some time it has been troubling that they continue to be found in soils disposed of in the lake.  
The tainted fuel could account for the continuing presence of PCBs in our Toronto environment. If they have been present in fuels used in automobiles in Toronto, then we have to be very careful of how we handle the soils from road and sewer projects in areas adjacent to roads, gas stations and parking lots.

Our committee recommends that the city develop procedures to handle the materials from roads, sewer, utility projects. As well, new investigations should be undertaken to determine if

these fuels have been sold in Toronto. The implications for public health need to be evaluated as well, and the methods of for disposal and testing of soil and road rubble should be improved accordingly.

Sarah Miller

Chairperson

Waterfront Remedial Action Plan

(WRAP) Committee