To By

RECEIVED APR 2 4 1987

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April 24, 1987

Ms. Y.Lane, Registrar
Consolidated Hearing Board
1 St.Clair Ave.W.
Toronto
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re: Halton Consolidated Hearing

cc. Mr. Sid A. Chumley
David Estrin & Fred Leitch, Esq., Q.C.
Stephen R. Garrod, Esq.
Thomas R.Lederer, Esq.
Michael McQuaid, Esq., Q.C.
Colin Stevenson, Esq.
John Tidball, Esq.
Robert Tuer, Esq.
Ms.Toby Vigod

Madam Registrar,

On May 5, 1987 I will ask the Board to amend the notice of hearing (Consolidated Hearing Act, RSO, ch.20,sect.6, 4) by way of the following two motions:

motion 1: that the total capacity of the landfill be specified in tonnes, in replacement of "7.96 million cubic metres" (twice on pg.3) and of "approximately 7.96 million cubic metres"(pg.4). The proponent has to give such an amount in tonnes.

motion 2: that the partial amounts of"ashes, garbage, refuse, domestic waste, industrial solid waste and municipal waste" which now are not specified on pg.4, be also specified in tonnes by the proponent.

And furthermore:

that for each of the above items: ashes, garbage, refuse, domestic waste, industrial solid waste and municipal waste, a full chemical characterization also be specified in order to be able to match the future parameters to be tested according to:
Environmental Assessment Act
Environmental Protection Act
Ontario Water Resources Act.
The parameters to be tested are those listed in Regulation 309 of the Environmental Protection Act and the Ontario Drinking Water Objectives.

Take notice as well of the following notices of motion on mine, which will also be presented to the Board on May 5, 1987.

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motion 3. re: Appendix 12. Schedule B-F Appendices, page with the title: "Groundwater chemistry. Bayview landfill. May 2, 1986. University of Waterloo wells. Site F".

Preamble: The analytical data for Wat 2-6, 2-7, 2-8, 2-10 are reported. I ask the proponent to answer the following questions:

3.1 The name of the person(s) who took the samples and when the samples have been taken.

3.2 List and values of each field measurements: pH, temperature, conductivity, etc.

3.3 Were these samples part of a bigger study, or were they taken independently from the previous studies.

3.4 The name of the person(s) who analyzed the samples, when and where the samples were analyzed.

3.5 Were are now the full original results? can you produce them?

3.6 Have the results been analyzed for interrelations or interwell relationship?

3.7 Were these samples standardized or spiked?

3.8 What was the instrumental precision and the accuracy of the results?

3.9 What analytical method was used in each specific case and where are these methods described?

3.10 Who used these results at the University of Waterloo? And who paid for these analyses?

3.11 Whether or not the person(s) who asked for these results were aware of Ms. Hewetson's 1985 data, as published on her thesis. And how the 1986 data relate with the 1985 and previous ones?

The above questions were presented to the proponent, together with others, on March 11, 1987, as part of question 2.18 on pg.5-6, but have not yet been answered.

conclusion: that the proponent presents the name(s) of the person(s) who took the samples in the field, the name of those who analyzed, paid for, explained and published these data.

and furthermore that: the abovementioned analytical data be produced to the Board in their original form: i.e., originally signed laboratory certificates or laboratory logbooks.

and, finally, that the Board subpoena the persons who took, analyzed, ordered, paid, explained and published these measurements. The proponent will have to present these names.

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motion 4. re:-Phase 2,Stage 2C. Appendix A5,B5,C5,D5,E4,F4.Groundwater chemistry. Final report no.7 Appendices.

-Schedule B-D Appendices. Appendix 11. Water Chemistry

-Schedule B-F Appendices. Appendix 12. Water chemistry

Preamble: Concerning the data in the 36 pages I ask the proponent:

4.1 The name of the person(s) who took these samples and when the samples were taken.

4.2 List and values of the field measurements: pH, temperature,conductivity, etc.

4.3 Were there other samples taken, besides those reported?

4.4 The name of the person(s) who analyzed these samples; when and where were these samples analyzed?

4.5 Where are now the full results? Can you produce them?

4.6 Were the results analyzed for interrelations and interwell relationships?

4.7 Were these analyses standardized or spiked?

4.8 What was the instrumental precision and the accuracy of the results

4.9 What analytical method was used in each specific case and where are these methods described?

4.10 Which tests failed and therefore were not reported?

4.11 Why were the following determinations not performed:
boron, cyanide (free), fluoride, nitriloacetic acid, organic nitrogen, radionuclides, trihalomethanes, turbidity;
PCBs, uranium; colour, methane, odour, sulphide, taste, temperature, total suspended solids;
BOD5, carbon chloroform extract, COD, dissolved oxygen, total organic halogens;
bacterial counts, density.

4.12 Were selfconsistency tests performed for each analysis: ionic balance, calcium-sulfate-carbonate-hardness equilibria, TDS-conductivity-density, etc.

The above questions have been presented to the proponent on March 11, 1987 but have not yet been answered.

conclusion: that the proponent presents the names of the persons who took the samples in the field, together with those of the analysts.

and furthermore:that the abovementioned data be produced to the Board in their original form: i.e., originally signed laboratory certificates or laboratory logbooks.

and,finally, that the Board subpoena the persons who took the analytical samples, together with the analysts of the samples. The proponent will have to present these names.

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motion 5. re: Schedule M: "Leachate..." by Pollutech.

preamble: twentyfour tables are presented; I ask the proponent:

5.1 How many samples of leachates were taken; where exactly were they taken;who took them& when were they taken? Describe also in details the location and surroundings where the samples were taken, as weell as the witnesses present at sampling.

5.2 Give list and values of the field measurements: pH, temperature, conductivity, etc.

5.3 Beside the samples whose results are reported, were there other samples taken?

5.4 Name the person(s) who analyzed the samples; tell where and when were those samples analyzed.

5.5 Where are now the full results of the analyses? Can they be produced?

5.6 Were the results studied for interrelations or intersample relations?

5.7 Were these samples standardized and or spiked?

5.8 What was the instrumental precision and the accuracy reached at the end?

5.9 What analytical method was used in each specific case and where are these methods described?

5.10 List the individual tests which failed for each sample.

5.11 Compare these analyses with the list in Schedule 4 (pg.62-63) of regulation 309. Why did the proponent choose to perform some in accordance with reg.309 and avoid performance of others? Give the two lists the one in accordance and the one in avoidance.

5.12 Were selfconsistency tests performed for each analysis: ionic balance, calcium-sulfate-carbonate-hardness equilibria, TDS-conductivity-density, etc. Produce their results or the reasons why they were not performed.

5.13 Explain what the summary tables from 1 to 8, pg.16-24, are supposed to tell us differently from the nonsummary tables 1-24. Why the two sets disagree: e.g., BOD5 of summary table 3 does not agree with that of Table 1.

5.14 Tables from 9 to 22 are illegible and so are many figures. Provide an enlarged version of Tables from 14 to 20 inclusives.

5.15 Tables from 2 to 8 do not indicate the machine detection limits in each determination. Provide them now.

5.16 Table 1 does not provide the units of measurements and its note is unclear; is the latter supposed to be the same of summary table 3 on page 19? Why is Table 8 so incomplete: chloride, sulphate, etc.?

conclusions: exactly the same as those of motion 4.

P. Boldrini