



THE TORONTO HARBOUR COMMISSIONERS

60 Harbour Street, Toronto, Ontario
Cable: 'Torport'
Telephone: (416) 863-2000

M5J 1B7
Telex: 06-219666
Facsimile: (416) 863-4830

John D. Herck, Chairman
Betty Dwyer, Vice Chairman
Ivan Clifford
Frank R. Smith
Dale Martin

ICB Brown, General Manager
Gary F. Reed, Secretary

*Circulate
to Environmental
Committee for
Review*

reply refer to file no

June 16, 1988

Chairman and Members
The Toronto Harbour Commissioners

We are in receipt of the attached letter and enclosures from Mr. W. A. McLean, General Manager of the Metropolitan Toronto and Region Conservation Authority requesting the Commissioners' approval of their proposed Lakefill Quality Control Programme. T.H.C. staff have not had an opportunity to adequately review this proposal and its implications however, I would like to make the following preliminary comments for your information.

1. The proposal does extend the control area significantly and expands the testing requirements to all projects generating more than 200 metres of material. This is a significant improvement over the requirements under L.Q.A.P. but the small projects remain untested.
2. The new testing criteria proposed for protected or confined areas appears to be more realistic and will certainly provide more flexibility.
3. In addition to greatly increased sampling, testing and consulting costs the developer/owner will be faced with an immediate doubling of the tipping charges from \$10.00 per load to \$20.00 per load to cover the cost of this programme.

- 2 -

4. The proposed programme is dependent on the availability and definition of "protected areas" and "confined areas". It is also dependent on the availability of rubble to develop and maintain the increased length of active shoreline that will result from the development of confined areas.
5. The proposed programme is limited to the Metro Toronto Waterfront.

In view of the above I would respectfully recommend that the Commissioners approve in principle the proposed M.T.R.C.A. Lakefill Quality Control Programme, subject to staff being able to resolve the many operating details necessary to implement the programme, while reserving the right to restrict the type and volume of material that will be accepted at any particular site.



Acting General Manager

:aeg





the metropolitan toronto and region conservation authority

5 shoreham drive, downsview, ontario, m3n 1s4 (416) 661-6600 FAX 661-6898

June 15, 1988

Mr. I. C. R. Brown
The Toronto Harbour Commissioners
60 Harbour Street
Toronto, Ontario
M5J 1B7

Dear Sir,

Re: Lakefill Quality

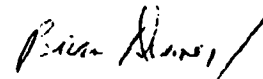
The Toronto Harbour Commissioners and The Metropolitan Toronto and Region Conservation Authority have always been concerned about the quality of material used in lakefilling projects and over the years have implemented many control measures. In recent months renewed concern about the Lakefill Quality Assurance Program has been expressed. The Minister of Environment has asked the Authority to serve as an agent for the Ministry in establishing an Improved Fill Quality Control Program which would apply to the Metro Region Waterfront. I have attached a copy of the Minister's letter for your information.

The Authority has responded to the Minister's request with a proposed Fill Quality Control Program. I have attached an outline of that Program which was reviewed with the Minister on June 9, 1988 and received his approval in principle.

You will note from the outline of the Program that the participation of the Toronto Harbour Commissioners is the vital ingredient. The Authority proposes to establish an agreement with the Commissioners whereby Authority staff would be stationed at Leslie Street Spit to advise the Commissioners staff as to the suitability of material. It is our firm belief that our two agencies can cooperate to ensure that reasonable precautions are being taken to control the quality of material which is used to construct valuable waterfront open space.

The Authority requests the Commissioners approval of the proposal for the Lakefill Quality Control Program. We acknowledge that many operational details must be resolved by our respective staff to implement the Program. Authority staff will be available to discuss the details of the Program at your convenience.

Yours very truly,



W. A. McLean
General Manager

Attachments:

BED/md



DELIVERED

Office of the
Minister

Ministry
of the
Environment

135 St. Clair Avenue West
Toronto, Ontario
M4V 1P5
416/323-4359
04M2502 (N/A)

APR 27 1988

Mr. W. T. Foster
Chairman
Metropolitan Toronto and
Region Conservation Authority
5 Shoreham Drive
Downsview, Ontario
M3N 1S4

Dear Mr. Foster:

My Ministry is intending to implement an improved lakefill pollution control program. The primary focus of our efforts has been the on-going lakefilling activities at the Leslie Street Spit. Control measures implemented there would likely be applicable to all lakefilling projects on the Metropolitan Toronto Waterfront.

We have had many discussions with numerous agencies, public interest groups and industry to explore how to improve the program. Based on these discussions and the meeting between your Mr. Bill McLean and our Mr. Walter Giles, I believe the Metropolitan Toronto and Region Conservation Authority would be the agency best able to administer such a program. I am therefore requesting that the authority consider acting on the Ministry's behalf for the administration of a lakefill quality control program for the Metropolitan Toronto Waterfront.

{ Such a program would be self-supporting, possibly through an increase in tipping fees.

The phased-in program approach discussed by our staffs with an implementation date of July 4, 1988 appears to be practical, and I have informed the Toronto Harbour Commissioners of my concurrence with this approach.

Mr. W. T. Foster
Page 2

Given the urgency of this matter, your earliest consideration of my request would be appreciated. Please be assured of the complete cooperation of my staff in this regard.

Yours sincerely,

ORIGINAL SIGNED BY [illegible]

Jim Bradley
Minister

cc: Mr. John D. Herrick, Chairman
Toronto Harbour Commissioners

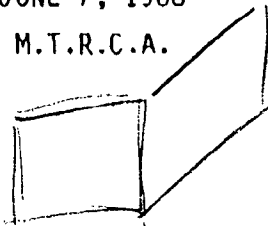
The Honourable Vincent Kerrio
Minister of Natural Resources

Mr. Bill McLean
Metropolitan Toronto and
Region Conservation Authority

OUTLINE OF PROPOSAL FOR A
LAKEFILL QUALITY CONTROL PROGRAM

JUNE 7, 1988

M.T.R.C.A.



$$10 \times 10 \times 10 = 1000 m^3$$

TESTING PRIOR TO EXCAVATION

- ADVISE INDUSTRY THAT BY AUGUST 2, 1988 ALL SITES GENERATING MORE THAN 2000 M³ MUST HAVE PRIOR TESTING AND ACCEPTANCE.
- ADVISE INDUSTRY THAT BY JANUARY 1, 1989 ALL SITES GENERATING 200 M³ MUST HAVE PRIOR TESTING AND ACCEPTANCE.
- ALL SITES LESS THAN 200 M³ WILL BE SUBJECT TO SCREENING AT THE SITE FOR SIGNS OF CONTAMINATION - VISUAL, ODOUR, ORGANICS TEST (ELECTRONIC SNIFFER).

UTILIZATION OF MATERIAL

- TEST RESULTS WILL BE USED TO DECIDE IF MATERIAL IS SUITABLE FOR LAKEFILLING
 - IN - OPEN WATER AREAS
 - PROTECTED AREAS
 - CONFINED AREAS.
- MATERIAL FOR OPEN WATER AREAS MUST MEET EXISTING LAKEFILL QUALITY GUIDELINES ON BULK CHEMISTRY FOR PRIORITY POLLUTANTS LEAD, MERCURY, CADMIUM, PCB'S.
- MATERIAL FOR PROTECTED AREAS MUST MEET PARKLAND CRITERIA FOR BULK CHEMISTRY AND MUST MEET DRINKING WATER OBJECTIVES ON A DISTILLED WATER LEACHATE TEST.
- UTILIZATION OF MATERIAL IN PROTECTED AREAS IS A CRITICAL FACTOR IN DEALING WITH THE VOLUME OF MATERIAL. NOT ENOUGH VOLUME AVAILABLE IN CONFINED AREAS TO TAKE ALL MATERIAL THAT EXCEEDS CURRENT LAKEFILL GUIDELINES.
- MATERIAL WILL BE USED IN CONFINED AREAS IF IT MEETS PARKLAND CRITERIA FOR BULK CHEMISTRY BUT THE DISTILLED WATER LEACHATE TEST EXCEEDS DRINKING WATER OBJECTIVES. EXPERIENCE TO DATE INDICATES THAT NO MORE THAN 10% OF THE MATERIAL WOULD FALL INTO THIS CATEGORY.

why water in all?

- MATERIAL FROM SMALL UNTESTED SITES WILL ONLY BE USED IN PROTECTED OR CONFINED AREAS.

- A POTENTIAL CAPACITY OF 200,000 TRUCKLOADS HAS BEEN IDENTIFIED FOR MATERIAL THAT WOULD REQUIRE CONFINED DISPOSAL. THESE SITES COULD BE AVAILABLE OVER THE NEXT 3 YEARS. ASSUMING AN AVERAGE DAILY RATE OF 1200 TRUCKS, 10% OF WHICH REQUIRE CONFINED DISPOSAL, THE ANNUAL REQUIREMENT FOR CONFINED DISPOSAL SHOULD BE ABOUT 30,000 TRUCKLOADS.

TIME FRAME FOR SOLUTION



- THIS PROPOSAL PROVIDES A SOLUTION TO THE UTILIZATION OF SURPLUS FILL FOR A PERIOD OF 5 TO 7 YEARS IF THE ASSUMPTIONS ON SUPPLY OF FILL AND MATERIAL QUALITY REMAIN VALID.

AGREEMENTS REQUIRED

- AGREEMENTS TO IMPLEMENT THE PROGRAM ARE REQUIRED AS FOLLOWS:
 - MOE/MTRCA - TO PROVIDE MTRCA WITH THE MANDATE TO ADMINISTER THE PROGRAM ALONG WITH SUITABLE LIABILITY PROTECTION AND FUNDING COMMITMENTS.
 - MTRCA/THC - TO OPERATE THE LAKEFILLING ACTIVITIES IN ACCORDANCE WITH THE PROPOSED PROGRAM AND PROVIDE FUNDING FROM REVENUES.
 - MTRCA/METRO - TO UTILIZE CERTAIN AREAS OF THE PROPOSED EXPANSION OF THE MAIN WATER POLLUTION CONTROL PLANT AS CONFINED FILL SITES.

LIAISON REQUIRED

- CONSTRUCTION INDUSTRY
- ENVIRONMENTAL INTEREST GROUPS

MATERIAL REJECTED FROM LAKEFILL

- M.T.R.C.A. WILL MAINTAIN AN INVENTORY OF ON LAND SITES WHERE MATERIAL REJECTED FOR LAKEFILLING COULD BE UTILIZED.
- MTRCA WILL ADVISE M.O.E. OF MATERIALS WHICH ARE REJECTED FROM LAKEFILL AND SUSPECTED TO BE SERIOUSLY CONTAMINATED.

PHASE IN PERIOD

- PROGRAM WILL BE PHASED IN AS OF AUGUST 2, 1988 WITH FULL IMPLEMENTATION SCHEDULED FOR JANUARY 1, 1989.
 - TESTING REQUIREMENTS WILL APPLY INITIALLY TO ALL PROJECTS YIELDING MORE THAN 2000 M³ AND FOR WHICH CONTRACTS WERE AWARDED AFTER MAY 2, 1988.
 - REASONABLE FLEXIBILITY WILL BE ALLOWED OVER THE FIRST 6 MONTHS TO AVOID UNDUE HARDSHIP ON THE INDUSTRY, ESPECIALLY CONCERNING PUBLIC PROJECTS, WHILE PAYING PARTICULAR ATTENTION TO PROPOSED EXCAVATIONS WITHIN FORMER INDUSTRIAL AREAS.

MAJOR BENEFITS OF THE PROGRAM

THIS PROGRAM PROVIDES SIGNIFICANT IMPROVEMENTS OVER THE EXISTING LAKEFILL QUALITY ASSURANCE PROGRAM AS FOLLOWS:

- EXPANDS CONTROL AREA FROM A SMALL AREA WITHIN THE CITY OF TORONTO TO ANY SITE FROM WHICH MATERIAL MAY BE TAKEN TO THE LAKEFRONT.
- EXPANDS TESTING REQUIREMENTS FROM LARGE PROJECTS (COSTS GREATER THAN \$100,000) TO ALL PROJECTS GENERATING MORE THAN 200 M³ OF MATERIAL.

- ESTABLISHES CONTROLS ON UTILIZATION OF MATERIAL WITHIN SELECTED AREAS OF THE SITE SO THAT ANY MATERIAL WHICH IS NOT TESTED OFF SITE WILL BE USED ONLY IN PROTECTED OR CONFINED AREAS.
- ESTABLISHES A STAFF GROUP WITH SOLE RESPONSIBILITY FOR LAKEFILL QUALITY.
- INCLUDES PROVISION FOR LIAISON WITH THE DEVELOPMENT INDUSTRY AND OTHER INTEREST GROUPS.
- OBTAINS PRIMARY FINANCING FROM THE GROUP BENEFITTING DIRECTLY FROM THE AVAILABILITY OF LAKEFILLING SITES.
- INCLUDES PROVISION FOR AUDITING TEST RESULTS THROUGH SPOT SAMPLING BY M.T.R.C.A.
- INCLUDES PROVISIONS FOR ADDITIONAL MONITORING OF LAKEFILLING ACTIVITIES INCLUDING WATER QUALITY, SEDIMENT QUALITY, CONTAMINANT MOBILITY AND BIOLOGICAL UPTAKE WHICH WOULD SUPPLEMENT THE WORK OF M.O.E. AND ENVIRONMENT CANADA.
- DEVELOPMENT OF DATA BASE OF SOIL QUALITY WITHIN THE METRO REGION MAY BE VALUABLE FOR OTHER ENVIRONMENTAL IMPROVEMENT PROGRAMS.
- LEACHATE TEST RESULTS ARE AVAILABLE MORE QUICKLY THAN BULK CHEMISTRY AND MAY BE MORE PRACTICAL ON REDEVELOPMENT PROJECTS OR MUNICIPAL PROJECTS WHERE ADVANCED TESTING IS DIFFICULT DUE TO EXISTING LAND USES.

U10
U11
U12
U13
U14
U15
U16
U17
U18
U19
U20
U21
U22
U23
U24
U25
U26
U27
U28
U29
U30
U31
U32
U33
U34
U35
U36
U37
U38
U39
U40
U41
U42
U43
U44
U45
U46
U47
U48
U49
U50
U51
U52
U53
U54
U55
U56
U57
U58
U59
U60
U61
U62
U63
U64
U65
U66
U67
U68
U69
U70
U71
U72
U73
U74
U75
U76
U77
U78
U79
U80
U81
U82
U83
U84
U85
U86
U87
U88
U89
U90
U91
U92
U93
U94
U95
U96
U97
U98
U99
U100

