



City of Toronto
Department of Public Health

A.S. Macpherson, M.D., M.Sc.,
Medical Officer of Health



Reply Attention:

Telephone:

January 23, 1989

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

Dear Mr. Brown:

Thank you for sending me a copy of the "Manual for an Improved Lakefill Quality Control Program", which was prepared by the Metropolitan Toronto and Region Conservation Authority. While I am generally satisfied that if the proposed testing and monitoring procedures were implemented, they would be effective in preventing the entry of most unacceptable material to lakefill sites, I differ with the Conservation Authority in the definition of 'unacceptable' material.

The Lakefill Quality Guidelines were introduced by the Ontario Ministry of the Environment to protect water quality. Therefore, I believe that no material that fails the Guidelines should be deposited in lakefill sites where it could adversely affect water quality. It is evident, however, from the Manual that the Conservation Authority is of the opinion that fill that fails the Lakefill Quality Guidelines is still acceptable for lakefilling, if it is placed in 'protected' or 'confined' areas.

The "Manual for an Improved Lakefill Quality Control Program" does not indicate the form or location of such protected or confined disposal areas, nor how contaminated material deposited in these areas would be protected from contact with Lake Ontario. The Manual also states that contaminated fill placed in protected areas will not be exposed to predominant wave action (my underlining), implying that it may still be subject to other wave and current action. Furthermore, there is no assurance that contaminated material in either protected or confined areas would be covered with a buffer of clean soil sufficient to protect end use.

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At their meeting on December 20, 1988, the Toronto Harbour Commissioners decided to provide protected, but not confined, areas for disposal of contaminated fill on the Leslie Street Spit. I support the rejection of confined areas, but would additionally suggest that protected areas not be provided either. I would also suggest that the Commissioners not accept any material from small excavations without laboratory testing at the Leslie Street Spit.

The Commissioners' policy, as decided at their meeting on December 20, 1988, is to allow material from small sites to be placed, without laboratory testing, in protected areas. As the material could still come in contact with the waters of Lake Ontario, this policy may not be desirable from an environmental point of view. The Metropolitan Toronto and Region Conservation Authority's recommendation that all material from small sites be placed in confined areas is preferable to the Commissioners' policy. An even better alternative would be for all material that has not been proven by laboratory testing to meet the Lakefill Quality Guidelines to be directed to one of the inland sites on the list of landfill and lakefill locations maintained by the Conservation Authority.

If you wish to discuss any of the points that I have raised, please feel free to contact Bill Munson in the Environmental Protection Office at 392-6788.

Yours truly

Brian L. Gibson, M.D., F.R.C.P.C.
Acting Medical Officer of Health

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