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Pamela Cushing
Department of National Defence
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Ottawa, Ontario K1A 0K2 ***Transmission by Email: Pamela.Cushing@forces.gc.ca***

Re: Response to Proposed Project: Trenton Cleanup Project – 8 Wing Site

The Canadian Environmental Law Association, Citizens' Network on Waste Management, Clean Production Action, and Northwatch are submitting the following comments and recommendations to the project proposal: *Source Control Remediation - 8 Wing Trenton, ON*, posted on the Canadian Impact Assessment Registry for public comment (Reference number: 89780).[1]

The Department of National Defence (DND) proposed project to remediate a contaminated site at the 8 Wing site is a welcome development. However, the proposed project covers only one of 3 sites at 8 Wing, Trenton base that have been identified with pollutant contamination in the Federal Contaminated Sites Inventory.[2] A more comprehensive proposal to address all sites is not outlined through this proposal, nor any indication of their status through this proposed project. Only one site: Site 00025077 - 8 Wing Site on the Federal Contaminated Site Inventory was explicitly identified with PFAS.[3] A search using "Mountain View" resulted in 2 sites identified, with one site under the authority of DND: Site 34476001 - Mountain View - Outer Landfill Site.[4] It is unclear how the location of the contaminated sites in the Federal Contaminate Sites Inventory aligns with the Proposed Project posted to the Canadian Impact Assessment Registry.

To support effective public consultation (particularly beyond the borders of federal lands) for proposed clean up of contaminated sites, the posting of this project on the government webpage

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[1] Government of Canada. Canadian Impact Assessment Registry. Source Control Remediation - 8 Wing Trenton, ON. Accessed at: https://iaac-aeic.gc.ca/050/evaluations/document/162635 on August 8, 2025.
[2] Treasury Board of Canada, see results for search using "8 Wing" identified 3 sites: Site 00000922 - Old Railhead Site at 8 Wing/CFB Trenton; Site 00025016 - 8 Wing 10 Hangar, and Site 00025077 - 8 Wing Site Wide PFAS. Accessed at: https://www.tbs-sct.gc.ca/fcsi-rscf/numbers-numeros-eng.aspx?qid=132118
[3] https://www.tbs-sct.gc.ca/fcsi-rscf/fsi-isf/00025077-eng.aspx?qid=132118
[4] https://www.tbs-sct.gc.ca/fcsi-rscf/fsi-isf/34476001-eng.aspx?qid=132452

is significantly inadequate. It has failed to outline how this proposed project addresses the impacts of contaminated sites on the surrounding community and its members.
The notice posted for the proposed project does not indicate what statute and regulation apply to the proposed project. Furthermore, the posting does not provide access to relevant documents and data that have been used to inform the development of the proposed remediation work. The lack of access to key documents and data to demonstrate why the proposed project is under development makes it impossible for the public to determine if the proposed project meets all legislative requirements and adequately addresses the contamination problem outlined in the proposed project.

Recommendation 1: Provide explicit information to the relevant stature and regulations that apply to the proposed project.

The information offered on the proposed project aims to undertake remedial action to remove/reduce per- and polyfluoroalkyl substances (PFAS), lead, petroleum hydrocarbon (PHC), polycyclic aromatic hydrocarbon (PAH), and volatile organic carbon (VOC) is an important effort proposed by the DND. Remediating these toxic chemicals that are found to be abundant on military sites across Canada is essential to limit the amount of harm that these chemicals can cause to individuals' health and livelihoods. Many of these toxic chemicals are associated with chronic adverse effects and therefore may not manifest for years and decades. With this, there is concern that the details of the proposed plan are inadequate and lack transparency about the impact of these substances and their long-term impacts on nearby communities and the surrounding environment. The webpage has not provided access to technical reports and accompanying test data to inform the rationale for the proposed project. No information showing the extent of contamination and how it can or has been impacting the community near the military base has been provided on the government site. It will be difficult to determine if the proposed project is actually mitigating harm caused by these chemicals without providing the public with information on how and to what extent communities were considered in this project.

Recommendation 2: Provide all data and additional guidance and details on the impacts to surrounding communities from the pollutants and whether there has been any leachate or migration of contamination from contaminated soil into groundwater, surface water and/or air.

The proposed project offers little to no information on how communities will be impacted by the site clean-up and the current and future impacts of this contamination. The Federal Contaminated Sites Inventory (the Inventory) shows that there is a population of 136,668 people within a 25 km radius of the 8 Wing Site Wide PFAS (Site 00025077). But it is unclear whether this specific reporting site encompasses the areas that are included in the remediation plan.[5] The Inventory shows for the Mountain View Inner Landfill (Site 34476004), which is included in the plan, that 137,537 people live within 25 km of the site. This is a significant number of people that have the potential to be affected by this contamination and deserve more data and details on what specifically is being done during remediation and monitoring, and how exactly this will impact

[5] *Site 00025077 - 8 Wing Site Wide PFAS*. (2024). Treasury Board of Canada Secretariat; Government of Canada. https://www.tbs-sct.gc.ca/fcsi-rscf/fsi-isf/00025077-eng.aspx

them. The government agency should include in its proposed project a substantial community engagement element throughout the development and delivery of its remediation plan that would include sharing the data collected from the contaminated site, as well as the elements of the remediation plan.

Recommendation 3: The Department of National Defence should require in its proposed project a substantial community engagement element throughout the development and delivery of its remediation plan that would include sharing data collected from the contaminated sites, as well as the elements of the remediation plan.

In regard to capping and vegetating the Inner Landfill, there are concerns about the long-term effects and effectiveness of containing contaminants. There have been some suggestions that landfilling PFAS-contaminated soil together with alkaline materials should be avoided because alkaline soils may promote leaching.[6] Is this the case with this site? How does DND aim to prevent leachate and track where and what happens with the leachate? What are the long-term limitations/implications? Will any treatments be done prior to capping? Has secondary contamination or exposure been considered? Proper excavation techniques (potential to release PFAS particles or leachate into the air or water)? Have social disturbances been considered? How will noise, dust emission or volatilization be handled?[7]

Recommendation 4: Provide an analysis of the level of reduction of PFAS and other toxic pollutants from the proposed project.

The proposal lacks clear performance targets or measurable outcomes for the remediation work. An analysis of anticipated pollutant reduction would allow the public and stakeholders to evaluate whether the proposed measures will sufficiently address the contamination. This analysis should include baseline data, projected reduction levels, and the scientific basis for these estimates. It should also clarify where the removed PFAS-laden soil was sent for disposal or treatment.

Recommendation 5: Require follow-up testing and monitoring of all the contaminated sites and the surrounding communities following remediation. The Department of National Defence should release to the public, the results of testing and monitoring of remediated sites and details on the final destination and treatment of contaminated soil to the public and hold public meetings to discuss plans to address remaining contamination of the sites.

Recommendation 6: For all suspected and confirmed contaminated sites under the authority of the federal government, including the Department of National Defence, the responsible department should require community engagement in sharing data related to the contamination and in the development of its remediation plan.

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[6] Travar, I., Uwayezu, J. N., Kumpiene, J., & Yeung, L. W. Y. (2020). Challenges in the PFAS Remediation of Soil and Landfill Leachate: A Review. *Advances in Environmental and Engineering Research*, *02*(02), 1–1. https://doi.org/10.21926/aeer.2102006

[7] Arel, N., Gagnon, F., Hains, S., & Golder Associates Ltd. (2022, March 25). *Fact sheet: Excavation and Treatment*. Public Services and Procurement Canada; Government of Canada. https://gost.tpsgc-pwgsc.gc.ca/tfs.aspx?ID=41&lang=eng

Based on the web posting, remediation is being undertaken specifically within the boundaries of the site. Was data on groundwater or soil that borders the site or that falls outside of the specific site taken? What about potential leakage of contamination outside of the borders, particularly to communities that rely on groundwater as a drinking source? Why were the results of any testing/data not made public?

Recommendation 7: Excavate deeper than 1m of soil at the FFTA and Fire Hall sites to ensure removal of deeper PFAS contamination and reduce long-term leaching risks.

PFAS compounds, particularly from AFFF use, can migrate downward through soil over years or decades, eventually reaching groundwater and nearby waterways, while concentrations are highest in the top 1-2 m of soil, PFAS has been detected at depths up to 15 m, especially in sandy or coarse-grained soils that allow for faster migration.[8] Given that 8 Wing has operated as a military base since 1931, the duration of potential contamination suggests that PFAS has likely migrated well beyond the top metre. Limiting excavation to only 1m risks leaving deeper contamination in place, continuing the threat of leaching into water sources. Without site-specific soil type and depth testing, the current plan may underestimate both the extent and long-term risks, leaving nearby communities and ecosystems vulnerable. Without site-specific data on groundwater proximity to the contaminated sites and the extent of possible PFAS groundwater plumes, the public will not be assured that their well water is safe.

Recommendation 8: Work with the Public Health unit to test all private wells neighbouring the military base for PFAS and other toxic pollutants and use the test data to inform the proposed project. The results of testing and how the data have been used to inform the project should be released and accessible to the public.

Testing of drinking water sources, particularly for private well owners off-site and down gradient of the Inner landfill site, was conducted. This data is important to inform this project to help determine what possible migration has occurred into drinking water sources for the surrounding communities. It is not clear, though, the extent of this testing. How many private properties were tested? How close in proximity to the site were they? Were sites other than those located down gradient of the Inner Landfill tested? Were PFAS groundwater plumes adequately monitored?

While DND attributes PFAS contamination at 8 Wing primarily to historical AFFF use, it has not publicly confirmed whether these foams have been fully discontinued. Only the Inner Landfill is listed under the Federal Contaminated Sites Inventory, leaving no official public record for other contaminated areas. The plan also lacks clarity on certain measures, such as the decision to backfill specific utility trenches near the FFTA, with absorbent material rather than fully excavating them. The rationale, cost, and timeline for these approaches remain unclear. Providing full disclosure on ongoing foam use, remediation strategies across all impacted areas, and detailed project milestones would improve public trust and accountability.

[8] Brusseau, M. L., Anderson, R. H., & Guo, B. (2020). PFAS concentrations in soils: Background levels versus contaminated sites. *Science of the Total Environment, 740*, 140017. https://doi.org/10.1016/j.scitotenv.2020.140017

Recommendation 9: Increase transparency on the scope, methods, and progress of the remediation plan, and publicly confirm whether AFFF are still used at 8 Wing.

Summary of Recommendations

Recommendation 1: Provide explicit information to the relevant stature and regulations that apply to the proposed project.

Recommendation 2: Provide all data and additional guidance and details on the impacts to surrounding communities from the pollutants and whether there has been any leachate or migration of contamination from contaminated soil into groundwater, surface water and/or air.

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Thank you for considering our comments and recommendations. Please contact us if you have questions. We look forward to opportunities to discuss your proposed project.

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Description of our organizations:

The ***Canadian Environmental Law Association*** (CELA) is a legal aid clinic dedicated to environmental equity, justice, and health. Founded in 1970, CELA is one of the oldest advocates for environmental protection in the country. With funding from Legal Aid Ontario (LAO), CELA provides free legal services relating to environmental justice in Ontario, including representing low-income and vulnerable or disadvantaged communities in litigation. CELA also works on environmental legal education and reform initiatives. CELA exists to ensure that low-income and disadvantaged people have access to environmental justice through courts and tribunals. As long as communities face barriers to accessing environmental justice, there will be a need for CELA's work.

The ***Citizens' Network on Waste Management*** is a network of citizens' groups throughout Ontario working on municipal waste, radioactive waste, and hazardous waste issues since 1981. The CNWM is dedicated to minimizing material and energy consumption, maximizing reuse of used materials, eliminating waste disposal, and eliminating toxic contamination of the environment.

Clean Production Action designs and delivers strategic solutions for green chemicals, sustainable materials and environmentally preferable products.

Northwatch is a regional coalition of environmental organizations, community groups and individual members in northeastern Ontario. Founded in January of 1988, Northwatch has as a priority issues that are of a regional nature: sound energy planning, healthy forests, responsible mining, waste reduction, and conservation of our natural resources and environmental assets. Northwatch has worked with residents over the past two decades to prevent northeastern Ontario from becoming the receiving ground for foreign wastes, whether it's Toronto's garbage, Ontario's biomedical waste, Canada's nuclear reactor fuel waste, or PCB's from around the world.