To: The committee on General Government Review of the Aggregate Resources Act

Attention: Sylwia Przezdziecki and Tamara Pomanski,
Room 1405, Whitney Block, Queen's Park, Toronto, ON, M7A 1A2

CLEAN, FRESH AIR

WHO NEEDS IT? WHAT’S IT WORTH?

Is it worth due regard in the Aggregate Resources Act? I believe it is.

One of the major concerns that many of us share is the restoration and preservation of our air quality.

According to current legislation and regulations, an applicant cannot obtain a license to extract aggregate unless:

“the Applicant has demonstrated that the impacts from dust and other air pollutants will be mitigated to acceptable levels “

So what is an “acceptable level”, and to whom must it be acceptable? Is this requirement properly dealt with in the ARA?

Consider - In the 1996 Caledon Planning Report #96-36, in comments regarding the proposed James Dick gravel pit expansion east of Kennedy Rd. it was stated: “Although dustfall levels exceed the provincial criterion, the marginal increase in dustfall resulting from the proposed expansion is not expected to have a noticeable effect.” [emphasis added] These words were intended to be reassuring, but what is the reality?

Imagine if your child came home from school with a note saying that classroom asbestos levels exceeded the provincial criterion and that a “marginal increase” might not be noticed. Would YOU be reassured? Besides, who can ‘notice’ dangerous particulates that are invisible?

I would like to know what actually happened in the above-mentioned case, now that we are 16 years further down the ‘gravel’ road. I am therefore asking that your committee determine what has been done, what is being done, and especially what needs to be done to preserve and protect the clean air that we require for healthy living.

Some of the questions that need to be asked are:

• What air contaminants are contained in the dust and fumes that are produced by aggregate operations – machinery, trucks, wind, etc.? I am especially concerned about the very fine particulate matter such as crystalline silica.
• What are the long term health effects of inhaling fine particulate matter such as is contained in diesel exhaust and wind-blown contaminants from open-pit mining operations?

• Are there any official tolerable/acceptable limits to exposure? What are they?

• What measures are being taken to see that limits are NOT exceeded? What happens if/when excesses occur? As far as I can determine there has been no requirement in the ARA or related acts and regulations for specific standards, monitoring and control measures.

• It appears there was no follow-up to the Caledon Planning Report mentioned above. It is unacceptable to continue with such laxity when the outcomes can be so tragic, as pointed out so clearly in the submission made by Ken Cressey on his own behalf and of his deceased wife Jeanine.

As a resident of Caledon, living in close proximity to a few thousand acres of operating pits, and on a major haul route, I can attest to high levels of visible dust. That’s bad enough to become concerned. But it is the INVISIBLE dust that is the most dangerous! Who is measuring this and determining its source? Please help remedy this acute danger by incorporating into the Act provision for adequate and ongoing monitoring as well as proper compensation for victims. Such a compensatory fund must be required by the legislation and provided by the aggregate industry, perhaps by means of a ‘Financial Assurance Agreement’ as is presently used in the mining industry. This would be just another cost of doing business in proximity to populations, and must be part of a ‘Full Cost Accounting’ approach to determining the economic viability of proposed and on-going aggregate operations.

Thank you for your serious consideration of these matters and for incorporating them in your recommendations.

Sincerely;
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