



Hamilton

Public Health Services  
Healthy Environments Division  
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Client Services and Permission Branch  
135 St Clair Ave West  
1<sup>st</sup> Floor  
Toronto, ON  
M4V 1P5

**Re: ERO 019-2302 Approval of a Site-Specific Standard Harsco Canada Corp. operating as Harsco Metals Canada**

Dear Sir/Madame,

Thank you for the opportunity to comment on the proposed *Approval of a site-specific air standard* for Harsco Canada Corp. operating as Harsco Metals Canada Corp.

**About the Health Hazards and Vector Borne Disease Program**

The Health Hazards and Vector Borne Disease Program, Healthy Environments Division of the Healthy and Safe Communities Department within the City of Hamilton (herby referred to as HHVBD) is mandated by the Province of Ontario's Ministry of Health and Long Term Care (MOHTLC). One goal of *Ontario Public Health Standards: Requirements for Programs, Services, and Accountabilities, (2018)* is:

*“To reduce exposure to health hazards<sup>9</sup> and promote the development of healthy built and natural environments that support health and mitigate existing and emerging risks, including the impacts of a changing climate.”*

HHVBD maintains *Ontario Public Health Standards: Requirements for Programs, Services, and Accountabilities, (2018)* mandated by the Province of Ontario as well as *Healthy Environments and Climate Change Guideline, 2018*.

The HHVBD is working towards enhancing public health capacity to address risk factors in the environment, identify and enable mitigation of risk factors related to environmental exposures that can contribute to the burden of illness, as well as facilitate upstream, preventative strategies for advancing healthy built and natural environment.

**Discussion Points**

The HHVBD supports the extension of the site-specific standards for Harsco Canada Corp.'s facility in Hamilton. The HHVBD also strongly recommends the Ministry of Environment, Conservation and Parks (MECP) to consider and require the following recommendations:

### *Ensuring Transparency and Public Participation*

The HHVBD staff have participated since the first approvals of several site-specific standards in Hamilton and wish to continue to do so. The MECP is strongly recommended to continue to require that any company registered within the site-specific standard compliance option continue to host, at a minimum, public meetings on a quarterly basis. At these meetings companies shall present information on their action plans for continuous improvement in reducing emissions that have required them to request a site-specific standard. Since the COVID-19 pandemic these meetings have been hosted virtually and have been a viable option and should continue to do so.

### *Ensuring Continuous Improvement*


The HHVBD strongly recommends the MECP to continue its historical efforts to require continuous improvement for reducing emissions, as it relates to this company for both Suspended Particulate Matter and Manganese and Manganese Compounds.

Currently within ERO# 019-2302 it is unclear whether or not this company will be required to continuously improve its emissions or submit an updated action plan to reduce its emissions exceeding *O.Reg. 419/05*.

The HHVBD strongly recommends the MECP **require** that before any extension or renewal of the site-specific standard is approved, that any company requesting the extension also submit an action plan, based on a robust scan of new potential technologies, provide details on how the company plans to achieve ongoing continuous improvement for **all** the emissions that require the site-specific standard.

Thank you very much for your time. The HHVBD continues to look forward to working with MECP to improve air quality in Hamilton and across Ontario to ensure the protection of public health.

Sincerely Yours,



Matthew Lawson, Manager  
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Healthy Environments Division,  
Healthy and Safe Communities Department,  
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