



Hamilton

Public Health Services
Healthy Environments Division
110 King Street West, 3rd Floor, Hamilton, ON L8P 4S6

May 26, 2021

Client Services and Permission Branch
135 St Clair Ave West
1st Floor
Toronto, ON
M4V 1P5

RE: ERO 019-3241 Approval of site-specific air standard ArcelorMittal Dofasco G.P.

Dear Sir/Madame,

Thank you for the opportunity to comment on the proposed *Approval of a site-specific air standard* for ArcelorMittal Dofasco G.P.

About the Healthy Environments Division

The Healthy Environments Division of the Healthy and Safe Communities Department within the City of Hamilton (hereby referred to as HED) 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 hazards⁹ 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."

The HED 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 HED 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 HED does not support the extension of the site-specific standards (SSS) for ArcelorMittal Dofasco G.P integrated iron and steel facility in Hamilton unless the below recommendations are included as part of the extension.

Ensuring Transparency and Public Participation

The HED staff have participated since the first approvals of several SSS in Hamilton and wish to continue to do so. The MECP is strongly recommended to continue to require that any company registered within the SSS 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 SSS. 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 HED strongly recommends the MECP to continue its historical efforts to require continuous improvement for reducing emissions, especially as it relates to harmful carcinogens including Benzene and Benzo[a]pyrene.

Currently ERO# 019-3241 states:

“Over the last decade, we have worked with the iron and steel industry to drive reductions in emissions of benzo[a]pyrene through the use of site-specific standards.

Although these actions have resulted in significant reductions in benzo[a]pyrene emissions, we recognize that further reductions are needed to reduce the risk of adverse health effects.”

The MECP has clearly articulated the need for further reductions, however is it unclear on how those reductions will occur until the proposed technical standards are created.

The HED strongly recommends the MECP **require** that before any extension or renewal of the SSS is approved, that any company requesting the extension also submit an abatement plan or continuous improvement plan and the MECP compare that plan against a robust scan of new potential techniques, technologies and hold the company accountable to those best practices for **all** the emissions that require the SSS.

Increased Benzo[a]pyrene Monitoring

According to MECP Hamilton District Office and the Hamilton Air Monitoring Network (<http://www.hamnair.ca/>) there are currently only four B[a]P monitors across all of Hamilton’s Downtown, Industrial Core and Beach Strip area.

Recent airshed modelling completed by MECP for their *Cumulative Effects Policy* and the City of Hamilton’s Airshed Modelling System completed by Golder Associates Inc. on behalf of the HED both show modelled higher concentrations of B[a]P within Hamilton’s Downtown, Industrial Core and Beach Strip community. Some data from the air quality monitoring station shows elevated concentrations of B[a]P, however because of the limited amount of monitoring

stations and their location, it is unclear of what the potential exposure risks to the community are.

The HED is strongly recommending that the MECP require B[a]P fence-line monitoring as part of the SSS extension to better understand the actual concentrations of B[a]P crossing the property boundary line. Furthermore, HED is strongly recommending that both the MECP and Hamilton Air Monitoring Network work together to establish more community-based B[a]P air quality monitors that represent actual exposure risks to nearby neighbourhoods.

Thank you very much for your time. The HED 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,

A handwritten signature in black ink, appearing to read 'KM', with a large loop at the end.

Kevin McDonald
Director, Healthy Environments Division
Public Health Services, Healthy and Safe
Communities Department
City of Hamilton