

# Public Feedback on a Proposal Made to the Ministry of the Environment, Conservation and Parks

Proposal initiated by: Dwayne Andrew Wilson operating as The Stool Bus

Instrument Type: Environmental Compliance Approval (waste)(/taxonomy/term/376)

ERO: 019-6708

Ministry Reference Number: 5619-CN5RQZ

Posted by: Ministry of the Environment, Conservation and Parks

Comment Period: March 2, 2023-April 16, 2023 Open

Site Address: 6953 Falconbridge Drive, Melbourne, ON N0L1T0

Site Details: Lot 4, Concession 3

## **Comments from a homeowner who lives downstream of the site.**

### **Environmental Assessment**

The proposal contains no provision for a thorough environmental assessment to be done before the operation begins. Issues to do with soil type, slope, water table height, the drains that pass through the property and the potential for run off into them, and more, are all issues that need careful examination.

### **Location of the Site Where Raw Sewage is Proposed to be Dumped**

The proposed site is flanked by pasture which apparently floods annually. Cattle grazing beside this site will not be fit for human or animal consumption if this raw sewage proposal is approved.

The land slopes from the road toward the drains that run through the property.

The water table is high & most residents in the region are on well water because there is no alternative. It appears that when previous digging occurred, water was struck and a pond created close to the road on this property. With our aquifer so shallow, we should not risk considering this

proposal.

### **Environmentally Protected Land At Risk**

The map included in the proposal shows 2 drains entering the site & one leaving. The drain then passes by environmentally protected land north of the railway line. With seasonal overflow of drains in the area a *reality*, the environmentally protected area is at risk of being impacted by bacteria, toxins & viruses contained in human waste.

The sewage pumped from a septic tank contains more than human waste. It contains the kitchen refuse, chemicals used in house cleaning, and other items that are flushed down a toilet. These toxic items all pose hazards to the health of local birds & animals.

### **Contamination of our Property Since the Drain Downstream of the Proposed Site Regularly Overflows**

Our property downstream of the proposed sewage dumping site experiences at least one overflow of the drainage ditch per year. It floods portions of our lawn as well as backing up along our sump drain. With pets & young grandchildren using our outdoor property, we fear for the risk of their contacting chemical irritants and contaminated items when they should be safe out in nature.

The drain system in Southwest Middlesex & Strathroy-Caradoc is extensive and eventually flows into the Sydenham River. Pollution from this site would have a far-reaching impact.

### **Other Chemicals Introduced Through Waste from Portapotties and People's Indiscriminate Flushing of Medications, Cleaning Agents & the Like**

Another fact is that the raw sewage that is proposed to be spread on the site will contain sewage from portapotties. They are utilized in supervised and unsupervised locations very commonly, and these may contain a host of chemicals and unhealthy items which may not be biodegradeable and may harm wildlife.

The chemicals used to deodorize portapotties can contain formaldehyde, a known carcinogen. The toilet paper used in all toilets can also contain bleach & formaldehyde.

There is no way to know just how many toxic chemicals are sitting in portapotties & septic tanks located in uncontrolled sites throughout the area. What is being spread is unknown and potentially dangerous to humans & wildlife.

### **Availability of Appropriate Treatment Facilities for Raw Sewage**

The raw sewage that The Stool Bus proposes to dump on this site can be treated within a reasonable distance in London. Spreading raw sewage on land is banned in many places, and is an especially undesirable choice when appropriate treatment of the material is nearby. Cost cutting over care of the environment is unacceptable.

### **Unregulated Sewage Disposal Companies Can Use the Site**

There is no statement in this proposal that prevents The Stool Bus from subletting the site to other companies which would not be specified as subject to the guidelines that The Stool Bus creates. Clarification about the users of the site must be made within the proposal and subsequently in the documents that will regulate the site.

### **Comments on Specific Portions of the Proposal by The Stool Bus**

Page 2 - "the company shall develop written procedures for reporting to the ministry, and municipal authorities as required in the event a spill occurs at the site"

- "Developing written procedures" by the company vs by scientists & ministry experts is vague and concerning. Communication must be prompt and thorough for the sake of the environment & local residents, and would be made best by someone without a vested interest in the company's reputation or financial standing. How quickly are these procedures created & by whom are they then enforced?
- "Spill" is not defined. Who has the discretion to decide what is reportable? Does The Stool Bus determine these parameters on its own?

Page 2 - "the company shall ensure that all personnel involved in the

operation of this hauled sewage disposal site are aware of the requirements of this approval and are trained in Spill Prevention"

- Is this training assuming someone reads a manual, or is it formalized, reviewed at regular intervals, & reinforced frequently?
- Is there a minimum standard defined for the public's safety by the ministry?
- How is the business monitored to ensure that this requirement is fulfilled?

Page 2 - "spills of a pollutant that cause or may cause an adverse effect are to be reported to the Ministry's Spills Action Centre and the company shall take appropriate remedial action to limit the impact"

- Who evaluates what will or 'may' cause an adverse effect? The company which hopes to spread the raw sewage on the property is not going to be unbiased in such an assessment.
- What constitutes an adverse effect?
- "Appropriate remedial action" is a very vague term which is concerning to me as a local resident.
- Again, who evaluates what is appropriate?
- Who holds the company accountable for downstream impacts?
- How are these remedial actions accomplished promptly?
- Adding a second cleansing pollutant to deal with an initial sewage spill is not an environmentally safe solution, in my view.
- When does the public receive notification that a spill has occurred?
- How is the public effectively notified?
- Will the public be educated as to the actions they should take in the case of a spill at this site so that they can be properly prepared?
- **Is there an automatic & significant fine that is enforced upon any company that is involved in a toxic spill?**
- The thought of any amount of raw sewage drifting by our property is repulsive.

Page 3 - "the company must ensure that no unnecessary off-site effect,

such as vermin, vectors, odour, dust, litter, noise or traffic, result from the operation of this site"

- Is this list exhaustive? What about truck exhaust? What about light pollution due to overhead lighting evenings & mornings?
- Who defines what is necessary or unnecessary? An odourless raw sewage site is an impossibility! Trucks entering & exiting the site is bound to cause more traffic noise and engine pollution to the neighbouring homeowners.

Page 3 - "a log book that documents...**any complaints received**"

- How is this enforceable?
- Can this log book be accessed by the public?
- How does a complainant achieve satisfaction in a timely & respectful manner?
- Where does a complainant CC their complaint to in order to improve accountability?

Page 3 - "no hauled sewage shall be spread or disposed of at the site when the ground is frozen, ice-covered or snow covered"

- Again, who monitors this restriction?
- What is the definition of "winter months" in a later paragraph of the proposal?

Page 3 - "...a maximum spreading rate...cannot take place within specified distances of sensitive features such as surface water..."

- There are drainage ditches/streams passing through the property as well as a pond that The Stool Bus wants to use as a spreading site.
- **The land is low and generally flat so the water table is shallow there & in the entire region. The seepage from spreading raw sewage for half the year cannot help but enter the region's water, along with the bacteria, viruses & toxins contained within.**

Page 3 - "no processed organic waste, grease trap waste or other waste, other than hauled sewage, shall be disposed of at the site"

- Again, who monitors this limitation?
- How can The Stool Bus know what percentage of kitchen waste, grease, fatty solids, etc are in a septic tank in order to avoid this restriction?

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This proposal by Dwayne Andrew Wilson and The Stool Bus is vague and makes many open-ended statements which fail to detail specific accountability by objective third parties. It appears to allow the applicant to define its own limitations & procedures. This is a serious proposal and should not be left in the hands of the applicant to operate on any kind of "honour system"!

The fact that Dwayne Andrew Wilson lives and works in Southwest Middlesex but wishes to pollute Strathroy-Caradoc is evident. Why has he chosen to do this in someone else's backyard instead of his own?

The huge berm of soil that has recently been made at the road on this site, convinces me that there is no transparency in the proposal, as those outside aren't supposed to see what's going on inside.