

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

May 3, 2025

Delivered via email: Enviropermissions@ontario.ca

Re: Public Comments on ERO 025-0288 and ERO 025-0289 – IMT Partnership Proposals

Attention: Ontario Ministry of Environment, Conservation and Parks - Client Services and Permissions Branch,

Transition to Less Waste (TTLW) and the Oxford Environmental Oxford Committee (OEAC) are nonprofit organizations based in Oxford County, Ontario that provide public education on issues related to air quality, water, and soil health. We pilot initiatives that promote and share key concepts of the international Transition community movement, with the goal of increased environmental sustainability and improved public health and wellbeing.

Our organizations have concerns about how the additional sources of pollution proposed through the two noted Environmental Registry of Ontario (ERO) posted proposals might impact the health of local families, our neighbourhoods within Ingersoll, those living in nearby communities, and the environment.

The Ministry of Environment, Conservation and Parks (MECP) is aware that our airshed is already impacted by the proximity of local quarrying, lime and cement manufacturing plants and other industrial sources of air pollutants.

ERO proposal 025-0288 asks for an amendment to an existing air and noise pollution permit (ECA number 8169-BRHS75) that would increase the amount of air pollution to be discharged from the facility due to increased production limits at the site at 347 King St. W., Ingersoll, ON:

The emission sources from the manufacturing and associated processes that discharge to the air include:

- *forging*
- *nosing*
- *hardening*
- *metal machining*
- *assembly*
- *welding*
- *cleaning*
- *phosphating*

- bitumen coating, and
- painting

The amendment includes an increase in the facility production limit to 2250 shells per day, and the addition of foraging and nosing presses, furnaces, welders, exhaust fans, a shot blast unit, dust collectors, a paint booth, comfort heating equipment, and a fume scrubber. Emissions to the air from this facility include:

- talc
- copper
- total suspended particulate
- nitrogen oxides, and
- crystalline silica

Source:

<https://ero.ontario.ca/notice/025-0288>

ERO proposal 025-0289 asks for a new air and noise pollution permit (ECA) for the site at 11 Underwood Road, Ingersoll, ON and states:

This application includes all emission sources from the facility that exhaust to the atmosphere including 20 machining centers with oil mist filtration systems discharging through four wall-mounted exhaust fans, and various heating units. Contaminant emissions to the atmosphere include:

- particulate matter
- triethanolamine, and
- 2-(2-aminoethoxy)ethanol

Source:

<https://ero.ontario.ca/notice/025-0289>

Concerns about proposed emissions include:

Talc

The Canadian Government has proposed adding Talc to Canada's **Toxic Substances** list due to impacts on human health¹, including respiratory health impacts and concerns about cancer.

Copper

Ontario includes occupational copper fume and dust and mist limits within **Ontario Regulation 833: Control of Exposure to Biological or Chemical Agents**. As the public does not wear the

¹ Government of Canada., Chemicals and Pollutants: Talc. Canada.ca

personal protective equipment recommended or required via **Ontario Regulation 185/19**² for those who work in occupations where they may be exposed to such fumes and dust, we are concerned that neighbours of the facility and others in the community may be exposed to respirable copper particulate, including PM2.5.

Particulate Matter

The Government of Canada's **Toxic Substances list: schedule 1**³ lists respirable particulate matter less than or equal to 10 microns as a "*toxic substance*" under the **Canadian Environmental Protection Act (CEPA)** "*It is entering or may enter the environment in a quantity or concentration or under conditions that c) constitute or may constitute a danger in Canada to human life or health*"⁴.

The MECP does not have any continuous air monitors in or around Ingersoll, and does not provide any real-time data or monitoring results for those who reside, work in or attend school or daycare in Ingersoll's airshed. We are concerned that Ontario is unable to confirm that concentrations of respirable particulate such as fine particulate matter are or will remain under the Canadian Ambient Air Quality Standard (CAAQS) or within the limits set of **Local Air Quality Regulation 419/05** for Ingersoll's airshed.

Nitrogen Oxide

The US EPA shares information about the potential health impacts of industrial Nitrogen Oxide emissions:

Breathing air with a high concentration of NO₂ can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms. Longer exposures to elevated concentrations of NO₂ may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma, as well as children and the elderly are generally at greater risk for the health effects of NO₂.

*NO₂ along with other NO_x reacts with other chemicals in the air to form both particulate matter and ozone. Both of these are also harmful when inhaled due to effects on the respiratory system.*⁵

² Government of Ontario., Ontario Health and Safety Act, Ontario Regulation 185/19 / Ontario Regulation 833 – Control of Exposure to Biological or Chemical Agents. [Ontario.ca/laws/regulation/r19185](https://www.ontario.ca/laws/regulation/r19185)

³ Government of Canada., Toxic Substances List: schedule 1. [Canada.ca](https://www.canada.ca)

⁴ Government of Canada., Toxic Substances List: Respirable Particulate Matter. [Canada.ca](https://www.canada.ca)

⁵ United States Environmental Protection Agency., Basic Information About Nitrogen Oxide. <https://www.epa.gov/no2-pollution/basic-information-about-no2#>

Ontario echoes these concerns in the **Air Quality in Ontario 2022 Report**⁸:

Impacts to health and environment

NO₂ can irritate the lungs and lower resistance to respiratory infection. People with asthma and bronchitis have increased sensitivity to NO₂.

NO₂ chemically transforms into nitric acid in the atmosphere and, when deposited, contributes to the acidification of lakes and soils in Ontario. Nitric acid can also corrode metals, fade fabrics, degrade rubber, and damage trees and crops.

Crystalline Silica

The US Department of Labour describes some of the debilitating effects of breathing in crystalline silica:

Breathing in very small ("respirable") crystalline silica particles, causes multiple diseases, including silicosis, an incurable lung disease that leads to disability and death. Respirable crystalline silica also causes lung cancer, chronic obstructive pulmonary disease (COPD), and kidney disease. Exposure to respirable crystalline silica is related to the development of autoimmune disorders and cardiovascular impairment. These occupational diseases are life-altering and debilitating disorders that annually affect thousands of workers across the United States.⁶

Health Canada lists silica dust as being in *Carcinogenicity Category 1A*. Noting that it's carcinogenic to humans (WHIMIS Classification). It is also in Category 1 for *Specific Organ Toxicity – Repeated Exposure*⁷:

Inhalation Route of Exposure:

Human Evidence: An abundance of evidence from human epidemiological and case studies has shown that inhalation of quartz/silica results in silicosis and severe lung effects, including accelerated silicosis leading to death. An historical mortality study, conducted in Italy among 520 silicotic subjects, confirmed the existence of a causal association between silicosis and increased mortality from both malignant and non-malignant respiratory tract diseases. Systemic complications linked to silicosis have included rheumatoid arthritis, scleroderma, systemic lupus erythematosus, autoimmune effects, kidney effects and vasculitis.

Lack of Air Quality Monitoring Locally:

None of Ontario's 38 Air Quality Health Index urban or rural monitoring stations are located in

⁶ U.S. Department of Labor., Health and Safety Topics – Silica, Crystalline. www.osha.gov

⁷ Health Canada., Hazardous Substance Assessment, Quartz Silica. <https://www.canada.ca/en/health-canada/services/environmental-workplace-health/occupational-health-safety/workplace-hazardous-materials-information-system/hazardous-substance-assessments/quartz-silica.html#health-haz2>

or around the Ingersoll area. There are no monitors anywhere along the 401 corridor between the London and Kitchener monitors. There are also no industry monitors with publicly available real time information. Ontario recognized these gaps in local air quality data in their **Air Quality in Ontario 2022 Report**⁸:

The ministry's Air Quality Health Index monitoring stations are generally representative of ambient air quality which reflects the contribution of all sources of air contaminants to air. These air monitoring stations are sited to be representative of general population exposure and thus do not necessarily reflect air quality at locations within a community that may be influenced by nearby local sources of air contaminants such as large industrial facilities or major transportation corridors. Concentrations of some air contaminants in neighborhoods located in close proximity to local sources such as an industrial facility may be higher than those measured at the ministry's Air Quality Health Index monitoring stations.

Concerns Regarding Environmental Registry of Ontario Process:

- The ERO postings do not share links to Emission Summary and Dispersion Modelling (ESDM) reports for the current air permit, or projections for the added pollution (no complete list of substances, contaminants potentially formed by the combining of substances, or amounts the surrounding community could be expected to be exposed to).
- There is no information available through the Environmental Registry of Ontario website on the cumulative impacts of adding additional pollution to our airshed, which is also impacted by other emitters, such as a nearby quarry operation that self-reported⁹ emitting over 519 tonnes of Nitrogen Oxides (expressed as nitrogen dioxide) and 294 tonnes of particulate matter into our local environment in 2023, an increase from the year prior.
- There was no Health Impact Assessment (HIA) or Human Health Risk Assessment (HHRA) available to view in support of the two proposals.
- There is no MECP staff member listed in either of the ERO postings as being responsible for providing additional information or materials – only a generic branch email address was provided.

The MECP has posted two complex proposals on the ERO related to air and noise permits for IMT Partnership concurrently. Our organizations are requesting that the opportunity for public comment be extended beyond the 45 days posted, to 120 days. We posit that it is in the public interest for Ontarians to learn more about the potential human health and ecological impacts from the proposals in order to comment. We recommend that reposted proposals include supporting documentation via links on the ERO.

Summary

TTLW and OEAC remain concerned that the MECP's allowance of cumulative impacts of many point sources of pollution in and around the Ingersoll area may be in contravention of the

⁸ Ontario., Air Quality in Ontario 2022 Report. Key Air Contaminants. Ontario.ca

⁹ National Pollution Release Inventory., Canada.ca

Environmental Protection Act’s “Adverse Effects” clause. Air pollution may cause people to be prevented from enjoying normal use of their properties and may cause potential risks to human health. Pollution may also have negative ecological impacts.

The various substances proposed to be emitted into the Ingersoll area airshed, include those that are reported to be toxic or potentially toxic to human health, those that cause silicosis or cancer, and those that may increase risks of respiratory, cardiovascular, autoimmune and neurological conditions and diseases. Risks from air quality are greater for those who are already vulnerable, such as our area seniors and children, and those with pre-existing conditions.

A lack of real-time monitoring in our area, and continuous air quality data gaps, reduce our confidence in the MECPS’s current methods for keeping our area population safe from increased air pollution.

The absence of supporting documentation on the ERO for proposals ERO 025-0288 and ERO 025-0289, the concurrent posting of the two applications, and the short time span available for public commenting opportunities could be remedied by increasing the comment period to 120 days and including all supporting document via links in the ERO. Information for proposals that may impact human health and the environment could also be made available in public locations such as local libraries and municipal buildings in and around potentially impacted communities.

Thank you for the opportunity to comment on these proposals.

Sincerely,

Transition to Less Waste
&
The Oxford Environmental Action Committee

Comments contained in this document are in regards to the Environmental Registry posted proposals related to ERO # 025-0288, ERO # 025-0289 and related matters. The Province of Ontario has solicited public comments via the Environmental Registry, and we are responding according to our legal rights afforded by Ontario’s Environmental Bill of Rights. The comments have been prepared by the nonprofit organizations the Oxford Environmental Action Committee (OEAC) and Transition to Less Waste (TTLW), and are the opinions of said organizations; they are submitted in the public interest, and in good faith, as comments on proposals which we feel may impact the environment and public health and safety.