

Pilon, Janet

Subject: Amended letter RE: Big toxic mess of PFAS/PFOS at the Hamilton International Airport**From:** Joseph Minor**Sent:** Tuesday, October 6, 2020 12:29 PM**To:** clerk@hamilton.ca**Subject:** ammended letter RE: Big toxic mess of PFAS/PFOS at the Hamilton International Airport

October 6, 2020

(I have received concerns about the accuracy of the previous version of this letter dated October 2, 2020 and sent on October 5, 2020. I have considered those concerns. I do not think the previous version was incorrect (based on what I knew at the time of writing and sending). In light of the concerns raised I have updated two sentences, and added a note. Please destroy the version dated October 2, 2020 and replace it with this version dated October 6, 2020.)

To: The Mayor and All members of Hamilton City Council c/o the Clerk, Hamilton International Airport, The Ontario Ministry of the Environment, Conservation, and Parks

Please show us the good work you have done putting a “cap” on top of the big toxic mess of PFAS/PFOS at the Hamilton International Airport. (43.1668, -79.9398)

(What follows is a summary of what I believe to be correct based on the information I have been granted access to. But that is part of the problem – there is very little information available to the public. If there is anything incorrect here, please send me the data that indicates what the error is and I will send a correction.)

This eMAIL is likely to arrive around October 12, 2020 (Thanksgiving). Thanksgiving 2020 marks almost exactly the one year anniversary of the completion of the “Mitigation Plan” construction to address the big toxic mess of PFAS/PFOS as well as address the toxic pond and ditch that were directly downstream of the big toxic mess of PFAS/PFOS.

In the spirit of Thanksgiving, I want to say that I am very grateful to be living in Hamilton, Ontario, Canada. We have it really good here, and almost everything works well almost of the time. I want to thank the politicians and government staff and public sector workers and private sector workers who all pull together to “keep the lights on”. And I am also grateful for all of the people who are working to clean up the big toxic mess of PFAS/PFOS at the Hamilton International Airport. And this means everybody: politicians (municipal, provincial, federal), public officials (municipal, provincial, federal), private sector officials, and consultants.

I have been spending a lot of time thinking about the difficult job all of these people do. A long time ago, I came to the conclusion that I lacked the skill set to be City Councillor. Amongst my many other deficiencies: I am impatient, and I am incapable of keeping a secret. It is ironic that the politicians we elect to speak for us have significant job related restrictions imposed on their free speech. What I have come to appreciate more with the wisdom of old age is that the same restrictions on free speech also apply to the other actors in this clean up as well. I used to think City Councillor was the most difficult job, but I now think City official might be harder. It is also clear that actors in the other categories share the difficult mental problem of having to keep information in their heads that they have to carefully meter out in differing quantities depending on who they are speaking to.

It is my opinion that there are serious deficiencies and even some inaccuracies in the current state of public information available about the big toxic mess of PFAS/PFOS at the Hamilton International Airport. In an effort to improve both the quantity and quality of the public record, I will need to be specific about the sources of information that exist. I am not trying to single anybody out, and I am not saying anything was done wrong. The specificity is just necessary to properly identify the information I wish to discuss.

As the cleanup progresses, it is important to both communicate clearly about what has been done, and to generate an open public record of accurate information. I think it is safe to say that aspects of this problem will continue to linger for many years. We need to consider the best way to package all of the very expensive information that we are compiling so that it will be available to those who will have to deal with this continuing problem many years later. I leave it to the many paid professionals in this process to construct and distribute (backups, eh?) the appropriate long-term public data archive. (Personally, I am big fan of public libraries as repositories for public information.) I will focus my efforts on asking questions (and hopefully receiving answers) about information that I think should be included in the public archive.

Since it has been a year since the completion of the Mitigation Plan construction project, I think the dust should have settled enough for us to see what was done. When I went looking for this information in August 2020, I was unable to find any (and I mean ANY) public information from after the completion of the Mitigation Plan work on October 11th, 2019.

As far as I can tell, the very limited public discussion about the Mitigation Plan actually occurred only during the fifth day (September 20th, 2019) of the 25 day Mitigation Plan construction period (Sept.16 to Oct.11). The discussion occurred as a result of a presentation to the "Airport Sub-Committee".

It appears there was an extensive discussion of the ongoing "Mitigation Plan" work at the Sub-Committee, but it occurred behind closed doors. The only mention of the "Mitigation Plan" work available to the public was:

"PFAS MANAGEMENT AND MITIGATION Airport Sub-Committee Meeting, September 2019

A Preventive Measures Order (a "PMO") has been finalized to address legacy environmental impacts associated with Transport Canada's historical firefighting practices. Working jointly with the Ministry we developed and, as of September 16, 2019, has implemented, a Mitigation Plan that calls for:

- the dewatering and restoration of an existing stormwater retention pond;
- excavation and long-term containment of PFAS-impacted soil and sediment; and
- the creation of a capped area on the former fire-fighting training area.

Following construction of the capped area, ongoing monitoring and inspections programs will be conducted to demonstrate the contamination is mitigated. This collaborative process demonstrates our ongoing commitment to public safety and the protection of the environment."

<https://pub-hamilton.escribemeetings.com/FileStream.ashx?DocumentId=203698>

The brief outline above was a small part of a much larger presentation on other airport issues given by the Hamilton International Airport to the Councillors on the Sub-Committee.

The Airport Sub-Committee meeting was also covered in a CBC news report:

<https://www.cbc.ca/news/canada/hamilton/pfos-hamilton-1.5291994>

Since there are no City records (I can find) of the content of the Mitigation Plan discussions, we are left only with the brief comments covered in the CBC News report, which included:

"The Mount Hope airport is in the midst of an 18-day clean up that involves gathering the contaminated soil in a container and sealing it, said airport president Cathie Puckering. "We're removing some of the soil and capturing it," Puckering told the city's airport subcommittee Friday. "That will reduce the risk.""

...and...

“The federal government has cleaned up the contamination that's leaked from the airport to the surrounding area, said Guy Paparella, city director in charge of the airport.”

I think both of these comments are inaccurate, and should be clarified. To be fair to the private and public sector representatives reported as giving the comments, it is entirely possible that the inaccuracies are an artifact of the reporting. Or to be fair to the reporter, they could be an artifact of editing.

(Note added October 6th. Quote from an eMAIL sent to me by the City Director in Charge of the Airport: “the statement you attribute to me is totally incorrect and was never stated by me in any context”. Please note that I did not attribute any comments to the Director, the CBC News article did. I share both of the Director's concerns: Both that the statement is incorrect, and that the CBC article attributed the false statement to the Director. The fact that the incorrect statement was attributed to the Director by the CBC gives the false statement unwarranted authority. Getting this corrected in the public record is a key point of this communication.)

But the problem remains that to this day is that if you Google “Hamilton airport contaminants” the top hit on Google is this article, which says “The federal government has cleaned up the contamination that's leaked from the airport to the surrounding area”.

This is a problem for two reasons:

1) The statement is false. Due to my past experience with the issue of the big toxic mess of PFAS/PFOS at the Hamilton International Airport, I was pretty certain that there was no way this could be true. But to be sure I contacted the consultant (Arcadis) working on the “Hamilton Offsite Risk Assessment”. Arcadis works for Transport Canada (part of the federal government). The response from Arcadis:

“Q (originally sent Sept. 28 at 1:48PM): Has “the federal government cleaned up the contamination that’s leaked from the airport to the surrounding area”?

No.”

I also asked an officer of the Ontario Ministry of the Environment, Conservation and Parks the same question and received basically the same answer.

2) The false statement could result in people eating fish heavily contaminated with PFOS.

The ubiquity and long memory of the internet means that false statements like this persist and can cause problems. I have asked the reporter to correct the error, but the commenting on the article is now closed.

But there is a better way of dealing with the stray occasionally incorrect statement. If there was a large quantity of publicly available correct information, then the chances of encountering the incorrect statements would be diminished. I am trying to do my part, but I could really use more assistance from the many professionals in this process. I was out of the country (and off the continent) when this statement was made. I am disappointed that none of the many professionals involved in the clean up process did anything that resulted in the incorrect statement being corrected in the public record. They need to be reminded that even though they knew the statement could not be true, that there are members of the public who do not have their level of expertise on the subject who could have been misled into eating PFOS laden fish.

The other statements attributed to the airport president by the CBC, while at the very least inaccurate, are not likely to cause much harm other than creating confusion about what was done. I know the statements confused me, and I guess some slight harm was done to the Ontario MECP officers who had to de-confuse me (they lost time). Briefly, the questionable statements:

From the CBC News article:

“gathering the contaminated soil in a container and sealing it”

"We're removing some of the soil and capturing it,"

From the presentation slide to committee:

“• excavation and long-term containment of PFAS-impacted soil and sediment;”

The problem with these statements is that absent the context of a full explanation of what was done (which only happened behind closed doors), the statements are actually misleading.

It is my understanding that there was no “container” and because there was no “container” there was no “sealing”.

No soil was actually “removed”, some (hopefully most) of the soil from the sites of secondary contamination was lifted and piled on top of the toxic hotspot at the former Fire Fighting Training Area (43.1668, -79.9398).

After the consolidation of hopefully most of the worst of the PFAS-impacted soil at 43.1668, -79.9398, it was “capped” there. This means it is covered on the top and some part of the sides, but it is totally open on the bottom.

Only time will tell if leaving the big toxic mess of PFAS/PFOS outdoors underneath a “low-permeability” box that is open on the bottom will result in “long-term containment”. In order to catch potential failures in containment early, the monitoring needs to be as close to the PFOS toxic hotspot as possible. Because of the widespread harm that has already occurred from this PFAS/PFOS toxic hotspot, the most effective way to restore public confidence will be to publicly share the details of the monitoring program, as well as the monitoring data as they are obtained.

The foregoing discussion cleans up most of the inaccuracies that were left in the public record regarding the PFAS Mitigation Plan construction that took place in Sept/Oct 2019. I remain disappointed that the professionals involved in the cleanup left these inaccuracies and false statements uncorrected in the public record for more than a year (Sept.2019 to Oct.2020).

But, as I am writing this (October 2nd, 2020), things appear to be improving. The Hamilton International website:

<https://flyhamilton.ca/environmental-management/>

is being updated with more information about the big toxic mess of PFAS/PFOS at the Hamilton International Airport.

This is a good start, and it will take me a while to consider the meaning of the “new” (to the public) information.

On a first read, my first impressions are that:

The “Mitigation Plan” construction that took place Sept/Oct 2019 is likely to have succeeded in mitigating the amount of PFAS/PFOS exiting airport property. In fact, there is one aspect of this Plan that went above and beyond anything I proposed in 2011. Consolidating the areas of secondary PFAS/PFOS contamination underneath the “cap” greatly decreases the area of PFAS/PFOS open to precipitation (that would wash it downstream). Thank you to the cleanup professionals who got this done.

While the size of the “cap” is smaller than I expected (and a bit off center of where I expected), I trust that there are data that support this decision. And I want to thank the cleanup professionals again for addressing what I identified as the most urgent need in 2011: dealing with the source of the contamination.

QUESTION: Would it be possible to release a picture (e.g., aerial or satellite view) of the Mitigation Plan area taken after the completion of construction? (anytime after October 11th, 2019)

I think the Mitigation Plan construction has mitigated the source of the contamination (Step One of a cleanup plan), which gives us all some breathing space to consider what should be Step Two. I am interested in any input about what this should be.

Absent any better ideas, I am going to proceed with what I think should be Step Two: Getting more of the public to hear the following message:

Do not eat the PFOS contaminated fish.

Or, more completely:

Never eat any of the fish downstream of the Hamilton International Airport (including Binbrook Conservation Area) that are so badly contaminated with PFOS that the that the recommended intake is "0".

Sincerely, Joseph Minor, PhD