

**Pilon, Janet**

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**Subject:** failure to properly identify the PFAS/PFOS Hazardous Waste Repository at the Hamilton International Airport

**From:** Joseph Minor [REDACTED]

**Sent:** October 4, 2023 11:33 AM

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**Subject:** failure to properly identify the PFAS/PFOS Hazardous Waste Repository at the Hamilton International Airport

Dear AVIANG Airport Consultants:

Please correct your failure to mention and properly locate the PFAS/PFOS Hazardous Waste Repository at the Hamilton International Airport in your “Hamilton International Airport 2023 to 2043 Airport Master Plan Draft Technical Report September 5, 2023”

Introductions: AVIANG Cons please meet: HORA Cons, FlyHI, City of Hamilton, OMECC, Transport Canada

AVIANG Cons: In case you are new to Hamilton, I thought you should be informed of the dirty big secret at the Hamilton International Airport.

For TWELVE YEARS I have been perplexed by the secrecy surrounding the big toxic mess of PFAS/PFOS at the Hamilton International Airport and the 50km stretch of the upper Welland River that it has badly contaminated. (Children and women who are either pregnant or who may become pregnant should not eat the badly contaminated fish that are currently swimming in the upper Welland River downstream of the airport, down through the Binbrook Conservation Area, on to and including the Port Davidson Conservation Area in Niagara.) Public disclosure by the professionals involved in this mess about where the contamination is, where it is moving, and whether or not the attempted clean ups are working has been minimal for more than a decade.

All of the parties I introduced you to (above) by copying them on this eMAIL have a lot of information about the big toxic mess of PFAS/PFOS at the Hamilton International Airport that they should have shared with you.

I am concerned that they did not share information with you because I see no mention of the big toxic mess of PFAS/PFOS at the Hamilton International Airport anywhere in your 124 page Airport Master Plan.

This is despite numerous maps in your Airport Master Plan that clearly show the area of the primary site of contamination (but it is not labelled on any of your maps).

For example: “Exhibit 6-9” page 43 “Recommended Airport Land Use Plan”: The primary site of contamination of the big toxic mess of PFAS/PFOS is right in the middle of a yellow triangle that you recommend be zoned as “AC” (Airport Commercial).

(Is it the usual practice of AVIANG to recommend “Airport Commercial” zoning on top of an unmarked PFAS/PFOS hazardous waste repository?)

It is possible that most of the big toxic mess of PFAS/PFOS at the Hamilton International Airport is in a mound inside the small rectangle inside a larger square with three small buildings along the west side of the square. Location: 43.166834N, 79.939798W.

In order to see the area in close up, please see the attached file: 2210HIA.pdf.

The file is a Google Earth image. The skull and cross bones icon marks the raised mound that is the primary PFAS/PFOS Hazardous Waste Repository. The secondary PFAS/PFOS Hazardous Waste Repository is the grey outer edge of the square (the secondary PFAS/PFOS Hazardous Waste Repository was covered over just before this image was taken in October 2022).

There may be other areas of PFAS/PFOS contamination that the public has not been told about. Particularly absent from public disclosure is what is happening to the PFAS/PFOS underneath the surface at the Hamilton International Airport.

City of Hamilton Zoning officials: I checked on the City's zoning website to see if the PFAS/PFOS Hazardous Waste Repository was marked there. Nope. The entire airport area is "no information available". It would be nice if this Hazardous Waste Repository was officially marked. The City of Hamilton has already been fined \$450,000 for its failure to properly identify and clean up a hazardous waste site in Hamilton. Can we please do better this time? If we fail to properly mark this spot in a permanent manner, who knows what will happen in the future when someone tries to construct "AC Airport Commercial" on the PFAS/PFOS Hazardous Waste Repository.

HORA Cons: Can you please explain to the AVIANG Cons that if the PFAS/PFOS Hazardous Waste Repository at the Hamilton International Airport is disturbed (for example, by AC Airport Commercial construction), that your "Hamilton Offsite Risk Assessment" study will be rendered meaningless and will need to be redone? Please explain to them that you have been working on your HORA study for 10 years. Could you please let us know when you will be done?

And, again, apologies to AVIANG – apparently nobody told you about the PFAS/PFOS Hazardous Waste Repository at the Hamilton International Airport.

This (2023) is not the first time that the Hamilton International Airport "forgot" about the big toxic mess of PFOS at the Hamilton International Airport. In 2011, when I first pointed out that this very spot (43.166834N, 79.939798W) was the primary source of the contamination, both of the top executives of the airport told me that this spot could not be contaminated with PFOS. One of them even issued a veiled threat that I should be very careful what I say about the airport being contaminated with PFOS because there are other sources of PFOS and the airport is not the main source. This 2011 "forgot" happened even though it was the airport that had been spraying PFOS on this location for years. In 2023 while the airport remembered his name and found a place to mention both his name and his position in the "Master Plan" (page 8), the airport once again "forgot" to mention both the name and position of the big toxic mess of PFOS at the Hamilton International Airport anywhere in the 124 pages and 54 maps in the "Master Plan".

Speaking of the dirty big secret at the Hamilton International Airport: What are the workers being told? You can see equipment being moved around inside the square. Are the people working in the square being told that they are working next to the primary PFAS/PFOS Hazardous Waste Repository (43.166834N, 79.939798W) and are surrounded by the secondary PFAS/PFOS Hazardous Waste Repository? I think it would be prudent to tell the workers (both present and future) about the big toxic mess of PFAS/PFOS at the Hamilton International Airport. If for no other reason so that in the future when the Master Plan instructs them to go out and start digging for the AC Airport Commercial construction that hopefully someone will remember what is here before exposing the hazardous substances.

The public needs to be given an explanation for: why the incomplete and discontinuous clean up? Why is only a small portion of the middle section capped? Why is there a wide ring of between the mound (43.166834N, 79.939798W) and the outer square channel that has been left both unremediated and open to precipitation? How could it be possible for the PFAS/PFOS contamination travel from the area where it was sprayed (43.166834N, 79.939798W) out to the surrounding square without contaminating the area in between? The limited clean up effort (e.g., compared with CFB Borden) just does not make any sense

considering what we know happened at the fire fighting training pad (the total square area surrounding 43.166834N, 79.939798W).

I am assuming that AVIANG was not informed about this repository of PFAS/PFOS hazardous waste at this location, because it seems inconceivable that AVIANG would recommend construction on this Hazardous Waste Repository had it been told of its presence there. If AVIANG had been told, it is even more inconceivable that they would not mention the big toxic mess of PFAS/PFOS anywhere in their 124 page report or on any of the many maps that cover the location.

I am disappointed that no one on the Airport Subcommittee said anything (in public) about the big repository of PFAS/PFAS hazardous waste at the Hamilton International Airport when they were given the “Master Plan” presentation on 9/11 2023.

There were multiple maps where the PFAS/PFOS hazardous waste repository could have been identified (frankly, on all would be prudent...). In particular, the PFAS/PFOS hazardous waste repository should have been mentioned on Exhibit 5.1 page 34 “Constraints and Opportunities”.

Certainly the presence of a PFAS/PFOS Hazardous Waste Repository is a “Constraint”. Green letter “G” should be put on the skull spot (43.166834N, 79.939798W) to say that: “Nothing should be built on this pile of PFAS/PFOS hazardous waste unless the City wants to be fined again.” (PFAS/PFOS are known as “forever chemicals”: if the airport/City fail to properly and permanently mark this big toxic mound of PFAS/PFOS and somebody disturbs it in the future, the \$450,000 fine the City paid the last time it messed up will look like nothing compared with the inevitable lawsuits that would follow.)

In 2011, I suggested that the best course of action regarding the big toxic mess of PFCs/PFOS at the Hamilton International Airport was to dig it up and move it to a hazardous waste facility designed for its safe containment.

If this action had been taken, then we would not need the Green letter “G” Constraint in the middle of the proposed AC Airport Commercial Zone.

It is not too late to do the right thing – actually on the map next to the Green letter “G” constraint you could put a Blue number “7” Opportunity:

Removing the big toxic mess of PFAS/PFOS from the airport property will increase the area available for AC Airport Commercial, as well as greatly reducing the probability of successful litigation against the airport/City for its ongoing failures to both properly clean up the mess and its failures to properly notify the public about the hazards. Opportunity Blue “7”.

(I am trying to do you guys a favor here: Failing to properly mark the presence of the big toxic mess of PFAS/PFOS at the Hamilton International Airport in the Master Plan (and elsewhere) could cause you legal problems in the future. Actions need to be taken to try to prevent history from repeating itself.)

One of my ongoing frustrations with the lack of public discussion about the big toxic mess of PFAS/PFOS at the Hamilton International Airport is that it leaves the impression with the public that the problem has been adequately “dealt with”. (Clearly not true.) The paucity of open public disclosure about the ongoing mess is particularly a problem for newcomers to the area (both Hamilton and Niagara).

Can we please do a better job of telling the public:

Children and women who are either pregnant or who may become pregnant should not eat the highly PFAS/PFOS contaminated fish downstream of PFAS/PFOS toxic hot spots (e.g., the Hamilton International Airport).

We have known that this is true since 2011, but as time goes on fewer people seem to be getting the message. (And the lack of public candor about the problem from the professionals involved is not in the public interest.)

Part of the message that is not getting through (particularly to newcomers) is just how far downstream in the Welland River the PFAS/PFOS contamination is so bad that children and women who are either pregnant or who may become pregnant should not eat the fish. The highly contaminated zone extends for more than 50 km downstream from the airport, through the Binbrook Conservation Area (Lake Niapenco), past the dam, and on to and including the Port Davidson Conservation Area.

And that is based on a 2016/2017 understanding of the hazard levels associated with PFAS/PFOS. Recent medical science research has indicated that the amounts of PFAS/PFOS that are a human health concern are much lower than what we thought in 2016/2017. Early in 2023, Health Canada posted a 25 page analysis that indicated that the 2016/2017 levels of concern are 20 to 80 times too high. Later in 2023 the US EPA posted a 500 page detailed analysis that indicated that the 2016/2017 levels of concern are 600 times too high.

Once these corrections (anywhere from 20X to 600X reductions in the amount of PFOS contaminated fish it is “advisable” to eat) are incorporated into the Guide to Eating Ontario Fish, it is clear that children and women who are either pregnant or who may become pregnant should not be eating any of the fish downstream of PFAS/PFOS toxic hotspots. In Hamilton/Niagara, this means children and women who are either pregnant or who may become pregnant should not be eating any of the fish in the 50km of the upper Welland River downstream of the Hamilton International Airport. This includes both the Binbrook Conservation Area and Port Davidson Conservation Area.

Returning to the big toxic mess of PFAS/PFOS still at the Hamilton International Airport: Advances in medical science mean that in 2023 authorities (Health Canada, US EPA) are saying that PFAS/PFOS are a health concern at concentrations 20X to 600X lower than was thought just a few years before. In addition, advances in laboratory measurement technology mean that the detection limits for PFAS/PFOS have also decreased significantly. It is no longer meaningful to say things like: “not detected” or “not of concern” or “below regulatory limits” without also giving the numbers for what the detection limit is, or what the level of concern is, or what the regulatory limit is. Taken together, this means that many studies that were performed just a few years ago are now obsolete (if their conclusions were based on “not detected”, or “not of concern”, or “below regulatory limits”). It is important for those in decision making positions to keep this in mind.

Going forward. Either:

- 1) Clean up the big toxic mess of PFAS/PFOS at the Hamilton International Airport (43.166834N, 79.939798W), or
- 2) Figure out how to permanently mark the locations of the PFAS/PFOS repositories at the Hamilton International Airport, and develop a long term communication strategy to ensure that everyone who may work there in the future understands what is there and why it should not be disturbed.

With respect to (2), both the Airport Master Plan and the City's zoning website have both already failed.

Please fix both the Airport Master Plan and the City's zoning website, then spend some time considering what needs to be done to keep these failures from repeating in the future.

Sincerely,



Legend



**PFAS/PFOS Hazardous Waste**

Hamilton International Airport  
43.166834N 79.939798W



100 m

Legend



**PFAS/PFOS Hazardous Waste**

Hamilton International Airport  
43.166834N 79.939798W

