



Hamilton

City of Hamilton
Public Health Services
Office of the Medical Officer of Health
1 Hughson Street North, 4th Floor
Hamilton, Ontario L8R 3L5

February 10, 2009

Diane Schwier
Aggregate Technical Specialist - GUELPH DISTRICT
1 Stone Rd. West
Guelph, ON N1G 4Y2

Dear Ms. Schwier:

SUBJECT: CBM St. Marys Cement Aggregate Resources Act Application, Former Township of East Flamborough, Concession 11, Lots 1, 2, and 3, Now in the City of Hamilton

I am writing to you as the Medical Officer of Health, Public Health Services for the City of Hamilton. Our organization has public health concerns regarding the operation of a limestone quarry as proposed by an Aggregate Resources Act Application made by CBM St. Marys Cement. These concerns are due to a potential risk for adverse impacts upon groundwater quantity and quality that could be caused by the quarry. To date, our public health concerns are limited to the scope of a CBM St. Marys Cement Hydrogeological Workplan that was to;

- obtain data to assess the potential adverse effects on groundwater quantity and quality that are related to the operation of a quarry, and,
- determine the feasibility of a proposed groundwater impact mitigation system.

The CBM St. Marys Hydrogeological Workplan has not been completed; therefore it is not likely that the hydrogeological reports necessary to support the CBM St. Marys Cement Aggregate Resources Act Application are complete. Additionally, the Hydrogeological Workplan mentions a draft Adaptive Management Plan to manage the dewatering effects associated with quarry development will be provided in a Hydrogeological Level 2 Report to promote discussion. Given the proposed size of the quarry and the related risks to groundwater quality and quantity, it would be preferable from a public health perspective that significantly more work be done to ascertain the groundwater risks and the feasibility of the Adaptive Management Plan before the ARA Application is considered complete.

Due to a potential for adverse effects on groundwater quality and quantity from the proposed operation of the quarry, and the degree to which groundwater users could be affected, this letter is a respectful request of you to:

- (a) Consult with the Ministry of the Environment regarding the completeness of Level 1 and Level 2 Hydrogeological reports that may have accompanied the CBM St. Marys ARA application;

- (b) Determine if additional information is required to be submitted with the application, and specifically whether other information on water impacts or any Ministry of the Environment approval, testing or decisions on the impact of the quarry on water quality and supply should be required, and;
- (c) Decide whether such information, approval, testing or decision should be required by you under subsection 7(5) of the Aggregate Resources Act. (set out below)”

“Additional information”

(5) The Minister may require an applicant for a license to furnish additional information in such form and manner as is considered necessary, and, until the information is furnished, further consideration of the application may be refused.”

Please feel free to contact Eric Mathews at 905-546-2424 ext 2186 should you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Richardson". The signature is fluid and cursive, with a large loop at the beginning.

Elizabeth Richardson, MD, MHSc, FRCPC
Medical Officer of Health
City of Hamilton

Cc Bill Bardswick, Ontario Ministry of the Environment
Dr. Robert Nosal, Medical Officer of Health, Halton Region