

TRIPLE M Metals Scrap Yard – Provincial Air Permit Application

How to prepare and submit commits via the Environmental Registry of Ontario

This information sheet provides all of the basic information you need to prepare and submit comments on Triple M Metal’s application to amend its provincial ‘Environmental Compliance Approval’ (ECA) for air & noise emissions from the company’s scrapyards located at 799 Parkdale Avenue North in Hamilton.

Under Ontario’s *Environmental Bill of Rights*, every Ontarian has the right to be informed of and to comment on applications with the potential to impact on the environment. As a result, Triple M’s application to amend its air permit has been posted to the [Environmental Registry of Ontario \(ERO\)](#) for public comment. The specific posting can be viewed on the registry by [clicking here](#) or searching the registry for ERO Posting Number 019-2002.

According to the registry posting, the company has applied to amend its existing ECA (air & noise) to ‘include new and previously unapproved equipment and potential sources of air emissions to the approval’.

Environment Hamilton requested the documents to support the company’s application to amend this permit. These documents – which are detailed technical documents – have been uploaded to our website for anyone who is interested in viewing them. Visit www.environmenthamilton.org/take_action to access them. We have also reviewed these documents and have pulled out key information that is summarized below.

Air Pollution Emissions

To apply to amend its air & noise permit, the company is required to do an ‘Emission Summary Dispersion Model’ – a computer air modelling exercise designed to assess air pollution emissions from the facility when operating at maximum capacity. The modelling done for Triple M’s Parkdale Avenue facility shows that the company is in compliance with Ontario’s maximum allowable emission levels for pollutants generated at the site. But it is worth noting that modelling shows one of those pollutants as being very close to the maximum allowable level – manganese. It is also worth noting that iron oxides are at 45 % of the maximum level and that ‘total suspended particulate’ or ‘dust’ is surprisingly and unconvincingly low for this facility at 17%.

Contaminant	CAS Number	Total Facility Emission Rate (g/s)	Maximum Concentration ($\mu\text{g}/\text{m}^3$) ¹	Air Dispersion Model Used ²	Averaging Period (hrs)	MECP POI Limit ³ ($\mu\text{g}/\text{m}^3$)	Limiting Effect	Regulation Schedule	Percentage of MECP POI Limit
Beryllium	7440-41-7	2.40E-06	8.10E-04	AERMOD v19191	24-hr	0.01	Health	B1 - Sch. 3	8%
Cadmium	7440-43-9	8.43E-06	2.06E-03	AERMOD v19191	24-hr	0.025	Health	B1 - Sch. 3	8%
Calcium Oxide	1305-78-8	3.77E-03	1.55E+00	AERMOD v19191	24-hr	10	Corrosion	B1 - Sch. 3	16%
Chromium	7440-47-3	2.70E-04	5.52E-02	AERMOD v19191	24-hr	0.5	Health	B1 - Sch. 3	11%
Inorganic Fluorides (as F)	7664-39-3	3.70E-04	2.70E-01	AERMOD v19191	24-hr	1.72	Soiling	B1 - Sch. 3	16%
Inorganic Fluorides (as F)	7664-39-3	3.70E-04	9.67E-02	AERMOD v19191	30-day	0.69	Vegetation	B1 - Sch. 3	14%
Iron (III) Oxide	1309-37-1	4.47E-02	1.12E+01	AERMOD v19191	24-hr	25	Soiling	B1 - Sch. 3	45%
Iron (metallic)	7439-89-6	7.94E-04	5.80E-01	AERMOD v19191	24-hr	4	Health	B1 - Sch. 3	15%
Lead	7439-92-1	2.15E-04	6.05E-02	AERMOD v19191	24-hr	0.5	Health	B1 - Sch. 3	12%
Lead	7439-92-1	2.15E-04	2.27E-02	AERMOD v19191	30-day	0.2	Health	B1 - Sch. 3	11%
Manganese	7439-96-5	1.38E-03	3.66E-01	AERMOD v19191	24-hr	0.4	Health	B1 - Sch. 3	91%
Nickel	7440-02-0	5.09E-05	3.58E-03	AERMOD v19191	Annual	0.04	Health	B1 - Sch. 3	9%
Nickel	7440-02-0	5.09E-05	1.17E-02	AERMOD v19191	24-hr	0.2	Health	DAV	6%
Nickel	7440-02-0	5.09E-05	3.58E-03	AERMOD v19191	Annual	0.4	Health	AAV	<1%
Particulate Matter	N/A	1.12E-01	1.99E+01	AERMOD v19191	24-hr	120	Visibility	B1 - Sch. 3	17%
Silica	7631-86-9	7.97E-04	5.82E-01	AERMOD v19191	24-hr	3	Health	B2 - MD	19%

Sch. 3: Refers to Standards in Schedule 3 of O. Reg. 419/05

B1: Benchmark 1 Value - Standards and Guidelines

E-GEN: Standard Applied for emergency generator testing.

¹ Sensitive receptors within the property were modelled using AERMOD and/or ASHRAE. Flagpole receptors 1.5 m above roof were used.

² The worst case result of the AERMOD and ASHRAE dispersion concentrations was used

³ Criteria listed in Version 2.0 of the MECP Air Contaminants Benchmarks (ACB) List dated April 2018.

When preparing your comments on air pollution impacts from the Triple M facility consider these issues:

- It is worth **questioning some of the modelled air emission results summarized in the chart above**. Levels of manganese coming from the facility are modelled at 91% of the Ministry of Environment limit. The modelled levels are very close to the actual limit, warranting a call for actual monitoring to determine how high these levels really are. The iron oxide levels are modelled at 45% of the limit; it is also worth calling for actual testing of iron oxide. Finally, the particulate matter (or dust) levels are modelling at only 17% - a highly questionable result given the fact that dust clouds are often observed in and around the site. Particulate pollution and iron oxide can end up falling out on nearby properties (think about dusty patio furniture and homes). Some particulate is small enough that it can create respiratory health issues. Referred to as PM2.5 or particulate matter that is 2.5 microns in diameter or smaller – this fine dust is a confirmed cause of lung cancer in humans. It is important to ask the Ministry to require the company to monitor for respirable particulate – not just ‘total suspended particulate’ which includes all particulate sizes.

-It is worth **requesting that the provincial Ministry of Environment require the company to actually MONITOR (measure) air pollution levels from the facility rather than just estimating using a computer model**. Nearby residents need assurances that the facility is actually operating within the allowable air emission limits.

-Triple M is also not the only source of manganese within the industrial core. Manganese is also released from steel mills in the industrial core. [Click here](#) to read more about the health impacts from inhaled manganese. In your comments you should **raise this concern – the fact that there are multiple sources of manganese in the industrial core and the Ministry of Environment needs to consider the cumulative impact of all of these sources in order to properly protect human health and the environment**.

-Finally add anything else you would like to share regarding air emissions – including sharing any details about how you believe this facility has impacted on you, your family, and your property as a resident of the adjacent neighbourhood. This might include fallout of particulate pollution on patio furniture/ windows /siding, particulate getting into your house, concerns about health impacts from exposure to air emissions, etc.

Noise Impacts

As part of this amendment application, the company was also required to assess noise impacts from the facility – a process that involves evaluating all individual sources of noise to determine whether additional actions are required to operate the facility within provincial noise guidelines. The assessment report concluded that the company is operating within allowable provincial noise guidelines but that any new equipment added to the operation should not exceed a noise level of 35 decibels (dB). Of particular note is Section 6.3 of this report – which sets out the ‘Noise Abatement Action Plan’. The action plan, which is incredibly brief, focuses on two methods for noise control: maintaining the heights of storage piles and restricting hours of operation for certain activities at the site to between 7am and 11pm.

When preparing your comments on noise impacts from the facility consider these issues:

- Point out that **establishing required heights for ‘storage piles’ does not constitute proper noise abatement**. The company should be required to install proper noise control walls/ barriers in locations where such controls are warranted. Relying on ‘storage piles’ - which we are assuming are made up of scrap metal or related material – for noise abatement does not provide the necessary permanent assurances for surrounding businesses and residents that noise will be properly controlled on an on-going basis. Further, the recommended height for Storage Pile #1 is 8m – well beyond the Ontario Fire Code’s 10 foot height limit for scrap yard piles that may contain combustible materials. In other words, this requirement for storage pile height to mitigate noise impacts could be introducing a fire risk at the site if the storage piles include

combustible material. It is also worth noting that the scrap facility next door – American Iron & Steel (AIM) has been required to install properly engineered noise abatement systems (not storage piles) and the same should be required for Triple M.

-Point out that, **ideally, the facility’s operations should be restricted to the hours between 7am and 11pm in order to address noise impacts in the area.** The noise abatement plan does indicate that certain equipment and activities – including shredder operation, slag metal recovery activities, iron slag dropping, and rail car shunting - will be restricted to these hours. In your comments, **be sure to request that the Ministry of Environment add a condition to the company’s air & noise permit that formalizes these operational restrictions.**

-Finally – add anything else you would like to share regarding noise impacts – including sharing any details about how you believe this facility has impacted on you, your family, and your property as a resident of the adjacent neighbourhood. Be sure to include impacts like the inability to enjoy your property or any other noise impact issues that have disrupted your life in the neighbourhood.

Submitting Your Comments

The easiest way to submit your comments on the company’s application is on-line via the Environmental Registry of Ontario. Again – the link to this posting can be accessed by [clicking here](#) or searching the registry for ERO Posting Number 019-2002. You can also snail mail your comments to the address in the posting.

Once you are on the registry, you will see a blue box on the left hand side labelled ‘Submit A Comment’ (circled in red in the picture below). Click on that box to access the comment form and fill out the form. The comment form includes a text box where you can write your comments. We advise that you draft up your comments off-line in a document and then cut and paste your comments into the comment form text box when you are ready to do so.

Please note that the **COMMENT DEADLINE for this proposal is August 20th!** Comments must be submitted by 11:59pm that day. If you have any questions/ need any help with preparing and submitting your comments, feel free to contact Lynda at Environment Hamilton at llukasik@environmenthamilton.org.

The screenshot shows the Ontario Environmental Registry of Ontario website. The header includes the Ontario logo and navigation links: Home, Search, Map, About, Register, Log in, and Français. The main content area displays details for a proposal titled "Triple M Metal Corp., as general partner for and on behalf of Triple M Metal LP". The instrument type is "Environmental Compliance Approval (air)".

ERQ number	019-2002
Ministry reference number	1000085488
Notice type	Instrument
Act	Environmental Protection Act, R.S.O. 1990
Posted by	Ministry of the Environment, Conservation and Parks
Notice stage	Proposal
Proposal posted	July 6, 2020
Comment period	July 6, 2020 - August 20, 2020 (45 days) Open
Last updated	July 6, 2020

Below the table, there is a section for "Proposals" with a "Submit a comment" button circled in red. To the right, a "Proposal summary" is provided, stating: "This proposal is to amend the Environmental Compliance Approval (Air & Noise) No. 4483-712P53 for Triple M Metal Corp., as general partner for and on behalf of Triple M Metal LP, a metal recycling facility located in the City of Hamilton, Ontario."