

ERO Public Comment Template

To whom it may concern,

We are writing to express our **grave concerns regarding the proposed approval of Ash Grove Cement's application to burn Alternative Low Carbon Fuels (ALCFs)** at their Mississauga facility.

As local residents, business owners, and active stakeholders within the City of Mississauga and the surrounding region, we urge the Ministry to reject this expansion of industrial waste-burning. The introduction of highly variable solid waste streams into our immediate neighbourhood poses unmitigated risks to human health, environmental safety, and the long-term planning vision of our municipality.

We request that the Ministry enforce regulatory frameworks and oversight standards comparable to those in European jurisdictions governing waste co-incineration in cement kilns (such as the EU Industrial Emissions Directive). Unlike Ontario's piecemeal framework, European regulations require:

- **Continuous Emissions Monitoring:** Mandatory real-time, continuous stack monitoring for a wide spectrum of pollutants—including total organic carbon (TOC), hydrogen chloride (*HCl*), hydrogen fluoride (*HF*), and heavy metals—rather than relying on delayed, periodic manual sampling.
- **Strict Input Characterization & Chemical Profiling:** Mandatory administrative, chemical, and physical profiling of all incoming waste batches prior to facility acceptance. This is essential to prevent contaminated wood or paper waste—containing chlorinated solvents, synthetic resins, adhesives, or treated lumber—from entering the kiln, where chlorine donors can trigger the formation and release of highly toxic dioxins and furans.
- **Stringent Thermal and Combustion Safeguards:** Enforced minimum operating temperatures (e.g., maintaining gas temperatures above 850°C to 1100°C for at least two seconds) to guarantee the complete destruction of complex organic compounds and persistent pollutants.
- **Integrated Quality Chains:** Dedicated, centralized pre-processing infrastructure that guarantees fuel homogeneity before it ever reaches a kiln.

Ontario's ALCF framework (O.Reg 79/15) lacks these mandatory continuous monitoring and strict input profiling safeguards. By relying heavily on self-reporting and infrequent spot-checking, the current framework exposes suburban residents to unmonitored environmental and health risks.

We submit the following detailed objections for the Ministry's immediate consideration:

1. Disregard for the Dr. Balsillie Airshed Action Plan and Local Land-Use Protections

The Ash Grove facility sits directly within the Clarkson Airshed, which has a well-documented history of cumulative pollution challenges. Over a ten-year span, the provincial government commissioned two separate study initiatives to address these growing pressures. The first, the *Clarkson Airshed Study* commissioned in 2001 in response to community alarm over poor air quality, culminated in a 2007 report identifying the severe extent of local pollution. To determine actionable solutions, the province then commissioned the *Southwest GTA Oakville-Clarkson Airshed Action Plan*, led by Dr. David Balsillie and published in 2010. The Balsillie report explicitly declared this a "taxed" and compromised airshed, **specifically identifying fine particulate matter ($PM_{2.5}$) as a critical pollutant with no safe exposure threshold**, and mandated that heavy industrial emissions must be aggressively reduced over time to yield zero net increase in key contaminants like $PM_{2.5}$. Now in 2026, far from seeing the promised environmental recovery, our local air quality has continued to degrade under the compounded weight of ongoing industrial intensification (which includes truck traffic) and regional atmospheric pressures—making any new particulate-generating permit completely indefensible.

While Ash Grove frames this proposal as a carbon-neutral strategy to reduce CO_2 emissions, burning solid biogenic waste inherently generates both primary soot/ash and secondary fine particulate matter ($PM_{2.5}$). Moreover, if incoming waste streams contain unverified chlorine sources—such as synthetic resins, chlorinated solvents, or treated lumber—combustion yields additional inorganic chloride aerosols and toxic organochlorines, elevating $PM_{2.5}$ levels far beyond those of clean natural gas.

Proponents of ALCF combustion often argue that high kiln temperatures and long residence times guarantee complete pollutant destruction. However, this claim ignores fundamental post-combustion chemistry. Extreme heat cannot destroy inorganic heavy metals, which vaporize in the kiln and condense into fine particulate matter ($PM_{2.5}$) as flue gases cool. High temperatures also fail to prevent *de novo synthesis*—the re-formation of toxic dioxins and furans in lower-temperature exhaust zones downwind of the kiln core. Additionally, because variable waste fuels cause frequent micro-swings in kiln temperature, unmonitored incomplete combustion events will inevitably occur.

Ultimately, approving a project that adds to cumulative particulate loading directly violates the core mandate of the Balsillie Action Plan, undermines local land-use protections, and poses an unmitigated threat to public health in surrounding residential neighbourhoods.

2. The Perverse Clash of Industrial Carbon Accounting vs. True GHG Reductions

We note with profound frustration the logic driving this application. **By November 2026**, Enbridge Gas will complete a major pipeline expansion delivering direct, high-capacity natural gas capabilities to the Ash Grove facility. Natural gas burns cleanly, entirely eliminating the localized bottom ash, heavy metal particulates, and unpredictable emissions associated with burning municipal and industrial waste.

Ash Grove's reluctance to pivot 100% to natural gas stems from a structural flaw in industrial carbon accounting rather than genuine environmental protection. Because natural gas is a fossil fuel, its emissions count fully toward regulated carbon caps. Conversely, under current frameworks, burning solid waste fuels allows the company to capitalize on "biogenic content" (wood chips, paper, and sawdust). Because this biological material absorbed carbon during its lifecycle, international accounting rules treat its combustion as **"carbon-neutral" on paper**.

This presents a perverse paradox: to achieve a corporate, paper-based carbon reduction, Ash Grove will truck, store, and incinerate complex solid waste in close proximity to residential areas—introducing particulate pollution into our neighbourhood—rather than utilizing the clean, enclosed natural gas line sitting on their doorstep. **The Ministry must prioritize real-world local air quality over corporate bookkeeping.**

This proposed strategy flatly violates the core mandate of the Balsillie Airshed Action Plan. Dr. Balsillie explicitly concluded that because there is no safe exposure threshold for fine particulate matter ($PM_{2.5}$), **local health must take precedence over industrial operational convenience—making the decision to bypass clean natural gas in favour of solid waste combustion is completely unacceptable.**

3. The Dangerous Regulatory Disconnect: The European vs. North American Realities

Advocates for ALCF combustion frequently cite European cement manufacturing as a success story. However, this comparison is entirely disingenuous. **The European model operates within a mature, highly integrated circular economy governed by stringent, federal-level regulations.** It relies on mandatory continuous stack monitoring, unannounced third-party auditing, and automated pre-sorting technologies that strictly control waste fuel chemistry before it ever reaches a kiln.

In stark contrast, the Ontario framework relies heavily on industrial self-reporting, piecemeal oversight, and infrequent, delayed manual compliance testing. Ontario simply lacks the comprehensive regulatory infrastructure and mandatory continuous monitoring required to guarantee fuel safety. Introducing variable, poorly sorted regional

waste into a kiln situated in a densely populated suburban environment—without European-level safeguards—is an unacceptable regulatory gamble.

Deploying ALCF combustion under this weak monitoring regime directly undermines the Balsillie report's call for precautionary, health-protective oversight. Permitting unverified waste streams into an atmosphere that Dr. Balsillie warned has already reached its toxic carrying capacity exposes our community to completely unnecessary and unmonitored risk.

4. Breaches of Community Trust and Capital Deployment

During several public and community advisory panel meetings, Ash Grove representatives consistently highlighted a substantial capital commitment—frequently citing **\$100,000,000**—allocated toward achieving their corporate greenhouse gas reduction and Net Zero targets.

If such massive capital reserves are indeed available, the Ministry and the public must ask why Ash Grove cannot go "all-in" on a complete transition to clean natural gas? If Ash Grove deployed these funds to absorb the carbon compliance costs of a natural gas transition, they could legitimately position themselves as an innovative, forward-thinking industry leader producing the greenest cement on the North American market. Instead, this capital is being leveraged to construct waste-handling, storage, and feeding infrastructure to incinerate regional refuse in our backyard.

Allocating \$100,000,000 to embed long-term waste-incineration capabilities rather than just transitioning to zero-particulate natural gas directly subverts the vision of the Balsillie Airshed Action Plan. Dr. Balsillie called on major industrial leaders to actively reduce their environmental footprint over time; spending capital to introduce waste-burning infrastructure intensifies industrial heavy-use in a residential area rather than moving toward attrition.

5. Shambolic Material Sorting and Sampling Safeguards

Current provincial environmental legislation lacks stringent material sorting requirements and enforcement mechanisms for industrial fuel production. Consequently, highly recyclable materials, chlorinated plastics, treated wood, and household hazardous wastes inevitably cross-contaminate the ALCF mixture.

Coupled with a profoundly inadequate material sampling and testing regimen at both origin waste-processing facilities and the Ash Grove plant itself, there is no viable mechanism to guarantee what materials are entering the kiln at any given hour. This leaves neighbouring communities entirely in the dark regarding the heavy metals, dioxins, and furans they may be breathing in. **If you can't enforce, don't approve.**

Allowing unverified, loosely sampled waste streams into a cement kiln directly ignores Dr. Balsillie's fundamental mandate: toxic emission risks in the Clarkson Airshed must be strictly quantified and systematically eliminated. Without continuous, unannounced, and rigorous input-testing, this application exposes adjacent neighbourhoods to an unquantifiable burden of secondary toxics in an airshed that is already severely overburdened.

6. Microclimate Vulnerability, Great Lakes Protection, and Transboundary Failure

The application completely glosses over critical local meteorological realities. The Ministry must recognize that prevailing wind currents off Lake Ontario regularly generate unique thermal inversion layers and microclimates. Far from resulting in the "substantial dilution" of industrial plumes claimed by proponents, these atmospheric conditions actively trap fine particulate matter close to the ground, concentrating toxic emissions directly over local homes, schools, and parks.

Furthermore, the facility directly borders Lake Ontario and key tributaries feeding the Credit Valley Watershed. **The continuous airborne deposition and runoff of heavy metals, chemical particulates, and toxic ash pose an immediate, unmitigated threat to these vital aquatic ecosystems and municipal drinking water sources.**

Canada and Ontario are bound by international commitments under the *Great Lakes Water Quality Agreement* to prevent, reduce, and eliminate toxic deposition into the Great Lakes basin. This proposal directly undermines those binding ecological commitments, yet the application fails to provide long-term modelling or testing for airborne deposition into the watershed.

Ignoring shoreline inversion layers and microclimate realities flatly contradicts the atmospheric modelling principles established in the Balsillie Airshed Action Plan. Dr. Balsillie explicitly warned that emissions in the Clarkson region do not safely disperse into the broader atmosphere, but instead pool directly over local neighbourhoods and waterways—making any addition of particulate-generating waste fuels an immediate threat to both public health and watershed integrity.

Conclusion

In an era where Ontario wildfires are increasingly blanketing **Mississauga and the Greater Toronto Area** in dangerous levels of smoke—regularly triggering some of the worst air quality indices on earth—the Ministry of the Environment, Conservation and Parks cannot in good conscience permit an industrial facility to intentionally introduce a new, variable, and unverified source of localized air pollution into an already compromised regional airshed.

To protect public health and restore regulatory integrity, we submit the following **urgent demands** to the Ministry:

1. **Overhaul Provincial Regulation:** We call on the Ministry to immediately update and overhaul Ontario Regulation 79/15 to align provincial ALCF rules with international Best Available Techniques (BAT)—including mandatory real-time continuous emissions monitoring, rigid third-party auditing, and strict prohibitions on burning waste fuels within designated, stressed urban airsheds.
2. **Ensure Transparency and Cumulative Impact Assessments:** We demand full transparency regarding the Ministry's due diligence when evaluating industrial waste processing and ALCF applications across the Southdown Industrial District—such as the recent York1 proposal at 580 Hazelhurst Road. Evaluating these projects in isolation actively ignores the cumulative environmental burden placed on adjacent residential communities.
3. **Reject the Ash Grove Application:** We demand that the Ministry **deny the ALCF permit application under ERO 026-0626** and mandate that Ash Grove utilize its upcoming Enbridge pipeline connection to transition 100% to clean-burning natural gas.

When an already compromised airshed, a Municipal Official Plan, and international Great Lakes protections all point to the same imperative, the Ministry's duty is clear. How can the Ministry justify evaluating these hazardous industrial proposals in piecemeal isolation—without performing a comprehensive, cumulative health and environmental impact assessment—while knowingly placing the burden of unquantified toxic emissions onto the residents of Mississauga and the Greater Toronto Area?