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The Ontario Association of Public
Health Nursing Leaders

Re: EBR Registry Number 012-4168 Guideline for the Implementation of Air Standards (GIASO)

Thank you for the opportunity to provide comments on your ministry's *Guideline for the Implementation of Air Standards*. The Ontario Public Health Association (OPHA) supports legislation and policies that address sources of air pollution in our communities and minimize exposure to the general public. The Ontario Public Health Standards, developed by the Ministry of Health and Long Term Care, mandates boards of health to increase awareness of the health risk associated with outdoor air quality and to assist with development of healthy policies. Please find comments below related to the GIASO document.

OPHA is supportive of those parts of Ontario Regulation 419/05 which aim to reduce exposure to substances in the air that can affect human health. For example, the following are some sections from the *Guideline for the Implementation of Air Standards* that are important to addressing human health in communities and we're pleased to see these aspects maintained:

- Limiting effects of air standards are based on health effects determined using no observed adverse effect level, lowest observable adverse effect, and lifetime incremental cancer risk of one-in-one-million.
- The use of a framework to manage risks with recommended responses depending on the exceedance circumstances.
- The participation of local stakeholders including public health in the development process of site specific standards.
- Facilities are required to assess potential receptors (such as health care facilities, child care facilities, dwellings, etc.) in addition to the point of impingement as part of the risk assessment process.
- For the mandate of continuous improvement in Regulation 419, facilities are required to review their progress and improve environmental performance.

Section 1.1 provides more information regarding the standard setting process, and other sections of GIASO note how standards are used in the development of a site specific standard process. However, it is not clear how air quality guideline values (available in the Summary of Standards of Guidelines: PIBS # 6569e01) are to be used in the process, particularly when a standard does not exist.

As noted in section 3.4 MOECC may develop short term standards over time. Further clarification is needed whether this would refer to current short term standards noted in the Summary of Standards and Guidelines document. OPHA encourages the development of short term standards that review the science relevant to short term exposures during higher emission scenarios and are protective of human health.

As part of the monitoring requirements, OPHA feels it is important to inform public health units where exceedances above air pollutant standards are identified. On occasion, public health units receive air quality complaints and inquiries from the public regarding facilities regulated by Regulation 419. Notifications of exceedances can help public health units respond to inquiries and ensure that the public is directed to the appropriate facility and/or agency.

OPHA is supportive of the guidelines identifying receptors such as child care facilities, dwellings, etc. as locations that would be subject to exposure assessment. Paragraph 6 of subsection 30(8) of the Regulation notes the MOECC Director can specify by notice a location where the discharge may be of concern to human health. Further clarification or examples are needed on how other locations may be included and on what stage in the consultation process stakeholders such as public health, can identify locations/receptors of interest. Considering the rapid development and growth of communities, it is important for facilities to consider land use changes and growth projections in identifying potential receptors.

The Regulation notes how properties within 500m from the facility should be notified of the site specific standard proposed for the facility. It is unclear how the rationale of 500 m was derived and if there is a need to go beyond the 500m for certain facilities. While the D-6 Guidelines are used for land use planning purposes, the guidelines note separation distances of 1000m for certain facilities.

Section 2.5 includes economic considerations that a facility can submit as part of the request for a site specific standard. When possible, OPHA would suggest considering health costs (e.g. economic health care cost evaluation) for different technical options as well as the impact on vulnerable populations.

As an organization committed to promoting health and wellbeing for all, having a health protective standard is critical for reducing the burden of illness created through poor air quality. We would be pleased to discuss our comments further and respond to any questions you may have. Please contact Helen Doyle, Chair of OPHA's Environmental Health Workgroup at Helen.Doyle@york.ca or by calling 1-877 464-9675 x 74500.

Thank you for the opportunity to comment on this guideline.



Pegeen Walsh
Executive Director