



MEMORANDUM

NOTE DE SERVICE

TO
A

Yvette Morin
Secretary
Technical Advisory Committee

FROM
DE

Michael Gilbertson
A/Water Pollution Biologist
Environmental Protection

SUBJECT
OBJET

Sanitary Site Clean-ups: Broughton Island/Clyde River


Stephen Harbicht has asked me to review the above documents and the following comments are offered for your consideration:

The first comment is a point of clarification with regards to the Regulatory Requirements identified in both reports. The reports indicate that it is the Department of Fisheries and Oceans which "regulates the release of all substances to a salt water body." The Environmental Protection Directorate, Conservation and Protection Service of Environment Canada is responsible for the administration of the pollution prevention provisions of the Fisheries Act. This responsibility includes the enforcement of subsection 36(3) of the Fisheries Act, which prohibits the deposit of a deleterious substance in water frequented by fish. Contrary to the statement from the reports quoted above, this prohibition is not limited to marine waters.

Water sample analyses from both reports indicate that some parameters are currently in excess of guidelines. The reports indicate that these values are consistent with runoff from such facilities, but do not identify at what levels these parameters would be enough of a concern to consider mitigation measures.

The reports also recommend that surface and groundwater from the landfills be monitored for a period of three years following closure. Once again however, the reports do not identify at what point the various sampling parameters would be considered problematic. Any monitoring program should be prefaced upon a clear statement of the elements to be considered and the concern levels of each which would trigger some mitigative action.

Please contact me at 920-6053 if there are any questions on the above.


Michael Gilbertson

cc S. Harbicht
L. Johnston

SECURITY - CLASSIFICATION - DE SECURITE
OUR FILE - N / REFERENCE
4782 -043/050
YOUR FILE - V / REFERENCE
DATE
September 27, 1993

0640.
Clyde River
Yvette

