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J. F. HAMM, M.D.

STELLARTON, NOVA SCOTIA

March 22, 1970

To Rust and Associates Consulting Engineers

Sirs:

You have invited representations concerning the area of your involvement as consultants to the Nova Scotia Government "in the matter of pollution control adequacy in the Boat Harbor area".

Two announcements appeared in the New Glasgow Evening News, the first on Thursday, March 20, 1970, which was in the nature of a news flash. The second was on Friday, March 21, and this was evidently a paid advertisement, placed either by your company or the Nova Scotia Government or the Nova Scotia Waters Resources Commission. A photostatic copy of each is attached on the next page.

Please allow me to draw attention to the fact that in neither announcement did the terms of reference of your duties appear. The first announcement designates the problem as the "Scott Maritime-Boat Harbor situation". The second refers to the problem as "the matter of pollution control facilities at Boat Harbor".

Since the first designation appears to me to be more appropriate to the actual problem I prefer to consider the problem as the Scott Maritime-Boat Harbor situation, and therefore begin my comments which are factual, directly at the Scott Maritime plant at Abercrombie.

Firstly, the Scott Mill must be considered a new mill. Operations only started in the late summer of 1967.

Secondly, effluent toilette at the new Scott plant is inefficient and inadequate as judged by present day standards. Robert M. Fowler, president

of Canada's Pulp and Paper Association has been quoted quite frequently in the Canadian Press this year and I enclose a photostatic copy of one of his shorter quotes--to the effect that anti-pollution measures now introduced in new mills are capable of eliminating practically all harmful and unpleasant waste material. This was contained in the Winnipeg Free Press, February 7, 1970.

Thirdly, not all the Scott effluent waste material is even reaching the so called treatment lagoons at Boat Harbor. Trips by boat over the pipeline area reveal constant bubbling, indicating leaks in this pipeline, and this effluent is polluting Pictou Harbor and has caused lobster pound loss to Mr. Campbell MacKay at the area of Pictou Landing referred to as Fairview.

The Ontario Waters Resources Commission, 801 Bay St. Toronto, Ontario, in one of their booklets on water management in Ontario (this particular booklet is called Industrial Pollution Control in Municipalities) state "the high temperatures of industrial effluents may accelerate corrosion, place thermal stresses on piping material, and adversely affect jointing material". This has obviously happened in the pipeline across the East River and this corrosion is very evident also on the concrete sluices after the effluent reaches the first lagoon.

Fourthly, the lagoons are very rapidly filling and the first and second appear to have reached three quarters of their capacity in two years and a few months, which would indicate that without dredging they will be overflowing and useless in less than a year.

Fifthly, The foul odor from the lagoons indicates that they are "dead"--that no oxygen is available to carry out necessary degrading. Mr. R. M. Billings of Neenah, Wisconsin, then vice-president of the Kimberley-Clark

Corporation advised Dr. John Bates in 1965-66 that this could happen and said that if it did, that the addition of 1:1,000,000 parts of oxygen would largely correct this malodorous condition. Mr. Armand Wigglesworth, then chairman of the Nova Scotia Water Authority definitely undertook to have aerators installed. This commitment on his part was made at a meeting of a citizens Committee, at the Federal Building, New Glasgow in February, 1966. The Chairman of what is now called the Nova Scotia Water Resources Commission, at a meeting of citizens, at Pictou Landing in the autumn of 1966, Mr. E. L. Rowe, disclaimed any responsibility whatsoever, for any previous commitments made by Mr. Wigglesworth and stated the aerators would not be installed because he said it would cost too much money, and to quote himself "he was a cost man". To date no attempt has been made to add oxygen. We more than agree with Mr. Rowe that he is a "cost man". He has cost our county a great deal.

Sixthly, the effluent is not being detained in Boat Harbor for the projected forty-one days. Tests have shown that some effluent entering Boat Harbor can appear in the receiving waters of the Northumberland Strait in as short a space as eight days.

Seventhly, the effluent reaching the Northumberland Strait-22,000,000 gallons approximately daily(minus what goes out the transriver pipeline into Pictou Harbor) is excessive in chemical, color, and solid content. Since resumption of the mill operations following the recent strike, the color index, on one occasion was found to be three times its usual index. I have heard many query the thoroughness of an investigation carried out at a time when the mill was not always in operation and weather conditions and ice might not make for optimal investigation.

Eighthly, the effluent discharged into the receiving waters outside Boat Harbor, in other words, into Northumberland Strait pollutes it. I cannot see how this can be refuted and I quote the definition of pollution as given in the Nova Scotia Water Act and Regulations, Chapter 312, Revised Statutes of Nova Scotia 1954 and amended in 1955-62-63-65. -67.

"Pollution means any alteration of the physical, chemical, biological, or aesthetic properties of the waters of the province, including changes of the temperature, taste or odor of the waters or the addition of any liquid, solid, radioactives, gaseous, or other substances to the waters, or the removal of such substances which will render or is likely to render the waters harmful to the public health, safety, or welfare or less useful for domestic, municipal, industrial recreational, or other lawful uses, or for animals, birds, or aquatic life."

The effluent discharged from the Boat Harbor lagoons into the receiving waters of the Northumberland Strait have, without any doubt, whatsoever, rendered several summer homes completely useless as recreational facilities, including swimming and fishing. This effluent has rendered many ~~more~~^{of} useless as recreational facilities for as much as five days a week in the summer season. The effluent has driven the aquatic life further and further out to sea. Gases from the effluent (and from the stacks) have removed or discolored paint on many houses and have interfered with the full right of owners or occupants "to enter into and enjoy" their homes. The nearby beaches, including Lighthouse Beach, have and are being spoiled. There is evidence that the area of this despoliation is spreading and effects have been felt as far away as Melmerby Beach, eight miles from the lagoon.

In the report of the Nova Scotia Water Resources Commission for 1969, given under the hand of the Minister Donald R. MacLeod, and presumably written by E. L. L. Rowe, (a photostatic copy of page is enclosed with the pertinent paragraphs marked) Mr. Rowe has the temerity to say he has eliminated the foam problem. Unqualified, this is not true. It has reduced the foam where the effluent first meets the receiving waters- but with some conditions of weather and turbulence this foam forms beyond this point and is washed up onto beaches. I don't think it is necessary here to comment on the statement that odor at the discharging lagoon is minimal. This is obviously untrue.

As a physician I have been asked to comment on the Public Health aspects of the situation and I will say this: The lagoons are contributors to what are at times alarming concentrations of sulphur dioxide in some areas of our county. It has been recently stated by medical authorities, after research, that when the concentrations of SO_2 over New York reaches a figure greater than .2 parts per million that 10-20 deaths will occur, attributed to this. Higher concentrations than the above have been observed in some county areas. As regards the malodorous H_2S -it is quite likely that people existing in the lagoon areas and close by habitation, subjected to the concentrations of this gas for long periods, will suffer increased morbidity. Calamities involving many deaths have happened in other countries where, accidentally, large quantities of H_2S have escaped.

It has been observed by all in the area that there has been a remarkable change in the insect life since the mill started operations-there are flying insects and mosquitoes by the millions. While driving at night

on the roads at Pictou Landing ones vision can be virtually interfered with by the myriad insects.

Secondly, as regards public health hazards from the effluent--it is not conceivable that any humans, except small children or mentally retarded ones, would deliberately go into the water when it is at its blackest. (I refer to the waters of the outside beaches, not the lagoons). Should such mentioned, however, ever get into trouble in such waters, rescue would not be possible. Objects cannot be seen at all beneath the surface.

I do not believe there is any knowledge as to what the ingestion of large amounts of this black effluent would do to a child's gastric or pulmonary tissue. I shudder to think of it. Externally, numerous cases of dermatitis have occurred when children have gone into water when discoloring had not been great.

Finally I feel compelled to make a few general remarks before closing. These I believe are pertinent to your consultation or investigation.

We are grateful to the Premier for taking cognizance of our difficulties and complaints and appreciate the fact that following his first real briefing on the problem he promised and instituted an independent enquiry.

We do rather lament the fact, however, that failure on the part of the Chairman of the Nova Scotia Water Resources Commission (and also on the part of the Minister under whom the commission is administered) to admit and perhaps to recognize that a problem existed, has cost the citizen's committee several thousand dollars* and uncounted hours of our time. In addition, of course, as previously mentioned there has been the loss of many many more thousands to some, in devaluation of real estate. This

* one item of which is \$11,500
the statement of which is herewith
enclosed.

applies both to summer and to permanent residents.

Moreover in spite of the fact that it is obvious to most everyone that a real problem exists, the aforementioned two gentlemen have continued to assert their satisfaction with the situation as it now exists and appear to take it for granted that they will be backed up in this by the consultants. In the light of what can readily be seen by ordinary discerning people- we believe that this is rather insulting to the integrity of the consulting firm of engineers, to continue this attitude during the investigation.

Our committee refuses to countenance any suggestions we have heard to the effect that a consulting firm of engineers, which is referred to in the paper as the pulp and paper engineering firm, may find it difficult to be objective and impartial, since it may depend largely on the pulp and paper industry for a large part of its work. We do not believe that a reputable firm such as yours would give anything less than a completely objective and impartial decision and recommendations.

Respectfully submitted,


J. B. MacDonald, M. D.

P. S. Since the writing of this submission, an article has appeared in the Evening News, March 24, 1970 (photostatic copy enclosed). In the light of this frank revelation, we must conclude that Mr. E.L.L. Rowe, who has always maintained very close contact with Scott Paper, must have had knowledge of these omissions, and has therefore been ^{somewhat} derelict in his duty to the Nova Scotia Government and to its people. The same would appear to apply to ~~Mr. Walter Miller, General Manager of Scott Maritime.~~ We must concede, however, that ^{HON} Mr. Donald R. MacLeod could have been completely unaware of this situation as he has more than once said in public that Mr. Rowe is his teacher.

PULP INDUSTRY TALKS POLLUTION AND PRODUCTION

HALIFAX — World demand for pulp and paper doubles every 10 years according to world industry officials.

MONTREAL: World demand for pulp and paper doubles every 10 years according to world industry officials.

The head of Canada's pulp and paper association Robert Fowler said production of 31 million tons after the Second World War had increased sharply to 112 million tons in Canada, Mr. Fowler said, the capacity can still be increased substantially.

He declared the Canadian industry has increased pollution control efforts and had reduced the amount of suspended wastes in the country's streams to 21 per cent of what escaped 8 or 10 years ago.

Anti-pollution measures introduced in new mills are capable of eliminating "practically all harmful and unpleasant waste material," he said. **FREE PRESS**

IN THE MATTER OF

POLLUTION CONTROL FACILITIES

AT BOAT HARBOR

The Company of Rust Associates, Consulting Engineers, will receive representations on

Wednesday, March 25, 1970

between the hours of 10 a.m. and 5 p.m.

**at the Norfolk Hotel
in New Glasgow**

Rust And Associates To Hold Public Hearing

HALIFAX — Rust and Associates, the pulp and paper engineering firm investigating the Scott Maritimes - Boat Harbor situation, will hold their public hearing in the Norfolk Hotel on March 25, E. L. L. Rowe of Nova Scotia Water Resources Commission confirmed here today.

Mr. Rowe said in a telephone interview staff members of the Montreal engineering consultants will be here to receive briefs or representations from any interested in presenting them.

"We'd prefer them to be in writing so the facts contained can be studied later by their expert staff. However, they'll have a tape recorder with them so statements can be taken and transcripts made."

Mr. Rowe added the Rust staffers would not be answering questions.

"They'll be here to listen. As engineers they are interested in facts and this is considered a part of their fact finding expedition. They are not interested in debating."

Mr. Rowe said he intended to be present but he would be sitting in purely as an observer since the firm had been engaged directly by the Nova Scotia Government to make an independent appraisal of the whole problem.

(At the time it was announced the firm would also be evaluating the report prepared by Delaney and Associates for the group of private citizens banded together as the Northumberland Strait Pollution Control Committee).

The hearing at the Norfolk will sit from 10 a.m. to five o'clock to give all interested the opportunity of making representation.