



Skootamatta District Ratepayers Association

Dec 3, 2009

I.M. Gemmill, MD, CCFP, FRCP(C)
Medical Officer of Health
KFL&A Public Health
221 Portsmouth Avenue
Kingston, ON K7M 1V5

Dear Dr. Gemmill:

We appreciate your response and commitment to consider our opinion as you proceed in your analysis of the Septic System Inspection Programme.

After considerable investigation we have reached the following conclusions:

- Since inspections of pre-build septic systems were removed from the jurisdiction of the MOE to the Building Code significant differences on how these permits are handled exist across the province. This is not necessarily a good thing for either our community Health or the Environment. To attempt to keep wells, rivers, lakes and streams unpolluted from human waste, given the constant pressure of development, we think that an arms length, professionally trained and consistent agency is required to meet community needs in this critical area of inspection and permitting. Third party inspection is a key element.
- If Public Health decides to withdraw fee for service, then we highly recommend that local Conservation Authorities, *who have trained and qualified waste water specialists on staff*, take over this inspection task.
- The convenience of a local field office in Cloyne or elsewhere is difficult to replace for those who require services. Fee for service, through another agency, without such a location is bound to cost more. Therefore the past fee for service does not fully convey the *potential true new cost* of withdrawal of Public Health from the equation.
- Additionally affecting the *potential true new cost* is liability insurance for whoever assumes this job. If coverage resides now with you, then funds must be transferred in any transition.
- It is essential, in our view, that accredited experts with *current and relevant knowledge* assess percolation rates and sewage system options under those particulars specified in Part 8 of the Ontario Building Code. To quote one expert we spoke with, ***“To continue placing only tile beds across the shield rock is in direct conflict with maintaining safe wells, clean lakes and rivers. New and***

alternate methods must be continually assessed against the location.” To ensure the ultimate in waste water assessment we think that the direction toward a *specifically trained specialist* is one our Township needs to consider.

- We , as a community organization ask that you, Public Health, our Townships and the appropriate Conservation Authorities work together to ensure and further the above strategy. We strongly support some type of public forum on this entire process. As so frequently is the case, citizens only know after the fact about decisions that seriously affect the health and welfare of their respective communities. After all, when sewage becomes a Health issue we are compelled to call in Public Health to assess the problem and, given some circumstances, the MOE. It seems unusual and in ways most unwise, that the initial installation inspection is not under the MOE or MOH to make certain that potential problems are avoided in the first place. Obviously we cannot reinvent the questionable bureaucratic events that resulted in this change to Section 8 of the Building Code some years ago. What we can do is question the approach to be taken now by your agency and the affected municipalities. Regard for the health and environmental welfare of waterway assets depend upon your collective and imminent decision.
- Compared to more urban townships, rural townships have individual septic systems versus communal treatment systems, sparser populations and less economic capability to assume *full time and qualified experts*. In the past several years we have seen transfers of multiple responsibilities of what were once provincial services to small rural municipalities. Are we to expect the same, yet again, without any commensurate funding?

Sincerely,

Rosemary Teed, Lake Steward, Skootamatta District Ratepayers Association

cc: Henry Hogg, Reeve, Addington Highlands, Terry Murphy, Quinte Conservation. Ed Gardner, Mgr Environmental Health KFL&A, John Gerretson, Minister of Environment, Deb Matthews, Minister of Health, Town of Greater Napanee ,Township of Loyalist ,Township of Stone Mills, Township of Central Frontenac, Township of Frontenac Islands ,Township of North Frontenac Township of South Frontenac ,Lake Associations within Affected Townships.