

**November 6, 2019**

**Replacement Effluent Treatment Facility Project**

**To:**

**Mr. Gordon Wilson and The Nova Scotia Department of Environment**

**My name is Robert Snow and I am a lifelong citizen (65years) of the Town of Pictou. Today I am writing to you in regards to the application for permission to build an effluent treatment plant (it is NOT waste water) at the Northern Pulp site in Granton which also includes a pipe that will carry same said treated effluent out into the Northumberland Strait via an overland route to Caribou Harbour. This plan is due to the planned shutdown of Boat Harbour, as per the Boat Harbour Act which was passed in 2015.**

**I am totally against this happening and I shall go into further details as to why.**

**I am not a scientist, by trade or education, but have a Millwrights Certificate and have practiced that trade for some 35 years. In all honesty I feel with everything I have managed to get a hold of and read and what I have seen with my own eyes, one does not need much education to come to the same conclusions that I have. I find the report is lacking in many ways with much needed information that has yet to be studied and produced. But really pretty much all you need is one simple thing, which seems to be a bit of a rarity these days and that is just some good old common sense.**

**So let's get to it and I will try to explain to you what I mean.**

**First off, have you ever visited Boat Harbour? If not you should above all do so, before you do anything else. If you did, it makes me wonder why you would even entertain the thought of moving what is in Boat Harbour out into the middle of Prime Fishing grounds in the Northumberland Strait.**

**Because from all that I have read, and what I have witnessed as to what is now going on in Boat Harbour and to think that basically it will be much the same thing going into the Strait.**

**My reasoning for this is :**

**First this comment taken from the Halifax Examiner:**

**“Chapman’s on-air boasts about effluent from the new system being better than it is now contradicts the views Northern Pulp’s technical manager expressed in private communication. In an email of November 29, 2017 to Dillon consultants, she writes:**

**Some say effluent quality [from the replacement treatment facility] will be worse than today because of all the polishing that is happening across the Boat Harbour basin — and they are correct to some extent”...**

**Then this taken from the EA 9.0 Human health Evaluation pg 489**

**At this time, effluent chemistry characteristics (including the specific substances present in treated effluent and their anticipated concentrations) will not be known with certainty until the project is operational.**

**Finally this taken from same section of EA page 491**

**In the EA they also used as their example a report from Tasmania of the proposed Bell Bay Pulp Mill as to what the effluent would be like.**

**So here they are planning to put a by product into the Strait, where Northern Pulp say they do not know what it contains now,( why do they do not know that, have they not ever had it tested?) Then they use a report that is in fact imaginary and just pure speculation; on top of that have a technical manager from Northern Pulp saying the new treated effluent will not be as good as to what flows into Boat Barbour at present day.**

**Does that sound good to you? Well it certainly does not feel very comforting to me at all.**

**Now not only will this Treated Effluent have all kinds of different pollutants in it like Furins, Dioxins even Mercury and Cadmium plus some other heavy metals, there is also the fact that it will also be hot and will contain nutrients that will be a type of BOD, Biochemical Oxygen Demand and Suspended Solids SS.**

**All of these things are known to be acutely lethal to fish. The pipe will of course create a dead zone in the Strait. How big that dead zone will be is yet to be determined, as we are lead to believe that the effluent coming out of the pipe will be apparent all be gone within five meters of dispersal. Northern Pulp states it will meet Marine Guidelines according to one ad that they have been posting on the internet. A statement that is actually false advertising ,as there are no Marine Guidelines, where ever they got that idea from?**

**So if you will imagine please, if you can, using the Town of Pictou’s Freshwater Containment Standpipe at the top of our Town. Then picture a total 19 of these full of effluent spilling out in the Strait in one specific place, every single day. Now tell me you believe that it will all just vanish? There is that Common Sense thing again jumping out at you!**

**Then let’s not forget the possibility of Pipe Leaks like the three known ones. Two major ones that have happened between Boat harbour and Northern Pulp one in 2014 of 47 million lts and a more recent one in 2018, that DOE is still sitting on to tell us the results even after 13 months of investigation.**

**So where does Northern Pulp want to run their Pipe? The route would take it right over the Town of Pictou's watershed. This is the good and friendly neighbour that they say they are. So they want to put at risk a whole town's water supply? Hello Common Sense !**

**Then of course we have the Pipe route into the Strait. Well as we all know the Strait freezes in the winter and during the breakup in the Spring we get ice moving all over the place from winds and tides. This can cause many problems, it moves underwater Buoy Bases, it gouges the seabed and it destroys wharfs and pretty much anything that gets in its way. Do a little research and find out the issue of buried sea cables and wharfs like one at Cape Pele in NB have suffered at the expense of moving ice in the Strait.**

**The sea bed at Caribou Harbour according to Navigation Charts is made up of sand and mud which are two types of underwater terrain that are never in a stable state but continually in some kind of movement. You only need to view a sandbar at the beach and see how it changes from Tide to Tide. The pipe diffusers cannot be buried so could sustain possible damage along with the pipe itself under these types of conditions. Considering the changes in the weather these last few years and the increases in wind storms, how much does that increase the odds of damage occurring?**

**I have seen nothing in the EA or the FR that address the problem of the pipe being damaged in the Strait and what they will do or how they will fix it. If damage happens what are the plans to repair it during the time ice is prevalent in the Strait?**

**Will they 1.) Just keep running and pumping effluent into the Strait, until such time as the ice is gone and work can be done. Or 2.) Will they shutdown and cease production for perhaps two to three months till conditions are right ?**

**OK so suppose you are happy with the Pipe and the treatment facility. Let's turn now to what they want to do with the dried effluent by product from the facility. My understanding is they want to take that product, which they still do not know what it contains, or perhaps refuse to tell us what it contains and burn it in their power boilers. Considering Northern Pulp's track record when it comes to air emissions I find that to be a very troubling way to deal with the destroying of the Effluent by product. Has any testing at all been done to evaluate at what temperatures the contents of the Effluent will be destroyed, if at all or if the Particular matter will be less than the 2.5m? From April 2011 to October 10, 2018, they had 14 Failed air emission tests. With it exceeding air contaminant emissions limits by nearly 50 per cent in June of 2017.**

**They are on one hand saying they are preventing some of the by product from getting to the water, but then they are basically just putting it back into the air. So not only are we looking at dealing with water pollution we are also looking at a very disturbing possibility of our air quality being even worse than it is now. With the number of respiratory cases in Pictou County over the years, can considering this kind of waste disposal actually make any sense? There it is again, that dam Common Sense.**

**I might as well add this extra bit as it also has to do with DOE and Northern Pulp. We are hearing from Forestry that if Northern Pulp fails to operate, that the Forest Industry in Nova Scotia will be decimated.**

**I think that the word decimated is used in the sentence in a very wrong way. Due to the operations and work methods of Northern Pulp it is not the Forestry Industry that is being decimated it is actually the forests themselves. I used to be an avid fisher and you would find me in the woods, on a lake or a river enjoying my favorite sport of Angling all the time. One of my favorite places to do that was in the Liscombe Game Sanctuary. In the end I had to finally give it all up, as I could no longer enjoy a day out when I would have to view the devastation from both my truck on the way or from the waters of my favorite lakes. A Game Sanctuary Clear Cut, not just a little but hundreds of acres, quite simply destroyed. Oh, they say no worries, it is a renewable resource. Yes it may be a renewable resource to some but I am afraid I do not have 80 years of life left to see it back in its previous state again. Some claim 30 years for harvestable trees. I call BS, been there after 20 years and it is still hardly taller than me and what is growing up in its place? Softwood, lots and lots of softwood and why? Because Northern Pulp sprayed it with Gylsophates. So looks like not only are they killing things with the use of their Pulp Emission Stacks, they are also killing with their spray programs and clear cutting practices. To think they say it only kills the hardwood? Guess the birds and small animals read spray warning signs and stay away when the spray is in progress. Is common sense ringing that bell again?**

**So in closing in my non scientific way, I ask you Mr. Gordon Wilson and the Liberal Government's Nova Scotia Department of Environment and all its staff. What will your legacy be? Now please think very carefully about this before you answer?**

**Are you going to have a legacy of being the ones who:**

**Saved the Northumberland Strait from becoming Polluted  
Saved our wonderful fresh Ocean Air and Forest air from being contaminated.  
Saved our Forests and all the creatures in it from devastation.**

**Or will your legacy be you saved a Multi Billion Dollar International Company and some 2700 jobs that all feel it would be a positive thing just for them lone?**

**Let's just hope you use all your common sense?**

**I am certain your families, friends and the majority of the people in Nova Scotia, Prince Edward Island and New Brunswick who are all negatively affected by it will want you to use your common sense and do the right thing.**

Sent from [Mail](#) for Windows 10