

City Council, Standing Committee and Commission
Conseil, comités permanents et commission

☒ **Motion**

☐ **Notice of Motion / Avis de motion**

Committee / Commission: Select a Committee / Commission
Comité / Commission : Sélectionner un(e) Comité / Commission
OR / OU

☒ **Council / Conseil**

Report / Agenda:
Rapport / Ordre du jour:

Item / Article:

Re: West Carleton Environmental Centre new Landfill Environmental Assessment Review

Moved by / Motion de: **Councillor E. El-Chantiry**
Seconded by / Appuyée par: **Councillor S. Qadri**

BE IT RESOLVED THAT Council waive the Rules of Procedure to consider the following motion at its meeting of 27 March 2013, because the comment period for the Amended Environmental Assessment (Amended EA) for a new landfill footprint at West Carleton Environmental Centre ends April 2, 2013; and

WHEREAS the Ministry of the Environment has jurisdiction over approval and oversight of environmental assessments in accordance with the *Environmental Assessment Act*; and

WHEREAS the purpose of the *Environmental Assessment Act* is the betterment of the people of the whole or any part of Ontario by providing for the protection, conservation and wise management of the environment; and

WHEREAS environmental assessments are an important and significant mechanism in the furtherance of the *Act's* purpose in that assessments determine the ecological, cultural, economic, and social impact of a project and that assessments serve a key part of the planning process; and

WHEREAS on April 10, 2010, Waste Management of Canada announced it was initiating an Environmental Assessment for the expansion of their existing facility to adjacent lands that it owns and/or has an option to purchase on Carp Road; and

WHEREAS on November 25, 2010, Waste Management of Canada received approval from the Ministry of the Environment to proceed with an Environmental Assessment; and

WHEREAS a final Environmental Assessment was submitted to the Ministry of the Environment on September 14, 2012 and the process allowed for agency and public

comment on the Environmental Assessment; and

WHEREAS the City staff had reviewed the Environmental Assessment and identified a number of concerns and deficiencies relating to same as set out in the staff Report on the Environmental Assessment of a New Landfill Footprint at the West Carleton Environmental Centre (ACS2012-COS-ESD-0013); and

WHEREAS the Environment Committee at its public meeting of October 16, 2012 endorsed the Staff Report; and

WHEREAS City Council at its public meeting of October 24, 2012 approved the recommendations of the Environment Committee and additional motion items relating to the Environmental Assessment, including the submission that the capacity of the proposed facility be reduced to 4 million cubic metres; and

WHEREAS the City's concerns had been forwarded to the Ministry of the Environment as part of the agency and public consultation process; and

WHEREAS Waste Management of Canada submitted an Amended Environmental Assessment to the Ministry of the Environment on January 21, 2013 and the Ministry released its Review of same dated February 22, 2013; and

WHEREAS the concerns and deficiencies previously raised by the City through its public consultation process in 2012, have not been resolved in the Amended Environmental Assessment or in the Ministry's Review and it appears that the Ministry of the Environment may recommend to the Minister of the Environment approval of the project without sufficient regard to the City's concerns; and

WHEREAS there is a further opportunity for agency and public input on the Amended Environmental Assessment by April 2, 2013; and

WHEREAS it is prudent for the City to reiterate its concerns to the Ministry of Environment, and directly to the Minister of the Environment, given that the Minister has the ultimate discretion and decision making authority on the Amended Environmental Assessment and project; and

THEREFORE BE IT RESOLVED THAT Council:

1. Reiterate its concerns on the Environmental Assessment, which were carefully arrived following staff's technical review of the Environmental Assessment and was further based upon the public consultations conducted by Council; and
2. That Council support the Mayor providing a further submission in the form and content of the draft letter attached hereto as Document 1, to the both the Minister of the Environment and the Ministry of Environment in accordance with the current public consultation deadline, reiterating Council's outstanding concerns and that the Minister of the Environment, being the ultimate decision maker on Environmental Assessments, give weight to the City's concerns and incorporate same into the decision making process and result.

3. That the legal opinion provided by Heenan Blaikie in this matter be made public.

DRAFT

March ____, 2013

BY FAX & COURIER

The Honourable Jim Bradley,
Minister of the Environment
77 Wellesley Street West
11th Floor, Ferguson Block
Toronto ON
M7A 2T5

AND TO:

Agatha Garcia-Wright, Director
Environmental Approvals Branch
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

Dear Minister Bradley:

**Re: Environmental Assessment for a New Landfill Footprint at the West
Carleton Environmental Centre
Reference No: 09025**

On behalf of Ottawa City Council, I am pleased to provide this letter as a further submission on the Environmental Assessment for a New Landfill Footprint at the West Carleton Environmental Centre (WCEC), as prepared by Waste Management of Canada. I have been directed by City Council by way of a unanimous Resolution of City Council made March 27, 2013 to provide this correspondence to both of your office's immediate attention. A copy of Ottawa City Council Resolution ____, is enclosed hereto for your reference.

I understand that the purpose of the *Environmental Assessment Act*, as set out in Section 2 of the Act, is for the betterment of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment. As indicated in the Ministry's documents, including as set out on your website, I further understand that in furtherance of this purpose, the environmental assessment process has been developed as an important and significant mechanism to determine the ecological, cultural, economic and social impact of a project and that assessments comprise a key part of the planning process for projects like the WCEC. In light of the purpose of the Act and the important mechanism that the environmental

assessment process serves, it is important that the concerns of the immediate community, municipality and the concerns of Ontarians as a whole be sufficiently addressed.

It is in this regard that the City is providing further input as part of the comment period for the Amended Environmental Assessment (Amended EA) for the WCEC.

By way of introduction, I am pleased to highlight that the City of Ottawa has taken its responsibility for managing the residential waste stream very seriously. Council believes strongly in the *Waste Diversion Act* and has tried to lead by example within the City by following the waste hierarchy of reduce, reuse, and recycle. We have developed and implemented a number of programs such as the blue/black box recycling, green bin organics recycling and household hazardous waste collection. We have developed and actively promote numerous other waste reduction and educational programs such as Take it Back, Give-away weekends, Green Bins in Schools and Public Events Recycling to name a few. The City has shown its leadership by entering into an agreement with Plasco Energy to develop a gasification technology to handle the City's residual residential waste. In addition, the City has initiated *Ottawa's Waste Plan* that has aggressive waste diversion targets and looks at our waste management needs over the long-term to achieve these targets. The outcome of these various commitments has been to reduce our reliance on landfilling and to extend the life of our landfill assets, namely the Trail Road Landfill and the Springhill Landfill.

COMMENTS ON THE EA

With respect to this application for an expansion of the WCEC, we recognize the Ministry's jurisdiction as being the ultimate approval authority. City staff and Council have participated throughout the environmental approval process, holding public meetings and submitting what we consider to be a number of carefully articulated concerns in regards to the proposed facility to assist your processes. However, the ***Ministry of the Environment (MOE) Review of the Amended EA*** document states, "Overall, the ministry in consultation with the Government Review Team (GRT), is satisfied with the proponent's decision making process." As a member of the GRT, the City feels this statement does not accurately reflect the City's position. In particular, there remain a number of concerns identified to the Ministry by City Council, which the City believes have not been adequately addressed by Waste Management or the Ministry.

Specific comments from Ottawa City Council, Environment Committee, being a Standing Committee of Council, and those of individual Ward Councillors representing residents in the vicinity of the proposed expansion of the WCEC, and City staff are reiterated in Tables 1 through 4, provided as an enclosure to this letter. However, there are a number of key issues of concern which I wish to bring to your attention. The following includes a summary of chief items of concern to the City.

Prioritization of Waste Diversion Activities

In the Amended EA, Waste Management has assumed a 2 percent increase in waste diversion and confirmed requested disposal capacity based on 400,000 tonnes of waste

per year for 10 years, plus interim and daily cover. The City is supportive of Waste Management's efforts to divert waste away from landfill and believes that landfill disposal should be of secondary importance.

Significant improvements will however need to be made to the Industrial, Commercial and Institutional (ICI) and Construction and Demolition (C&D) waste diversion rate to achieve the Province's goal of 60%. The City is requesting that the Province set established waste diversion targets for ICI and C&D waste diversion for the service area of the landfill and that Waste Management's total allowable annual tonnage accepted at the WCEC landfill, if approved, decrease at the same percentage rate from the first year annual tonnage of 400,000 tonnes. Contaminated soils that are landfilled must be counted towards the site's annual capacity, even if they are used as daily, interim or final cover.

The City is seeking a commitment from both Waste Management and the Ministry that this be the last time that Waste Management be allowed to request a new or expanded landfill footprint at the WCEC.

Service Area

The proposed service area for the waste diversion facilities and landfill should be restricted to exclusively the municipal boundary of the City of Ottawa and that of Lanark County. Contaminated soils brought to the site should also be restricted to those generated within the same territorial limits. The service area for all waste diversion facilities at the site should be restricted to the City and Lanark County so as to prevent materials from other communities being brought into the landfill through these recycling facilities.

Odour

The City has not accepted the approach taken by Waste Management and their consultants to exclude process upset conditions from the odour impact assessment studies. The City considers "upset conditions", examples of which include temporary inoperability of the landfill gas collection system, cracks or fissures in the landfill cover, or the installation of additional landfill gas collection infrastructure, to have significant potential for generating odours which may have an impact to areas surrounding the landfill. The detailed impact assessment for odour also excluded odours arising from on-site daily cover contaminated soil stockpiles and the use of compost "anticipated to generate odour similar to the background odour from agriculture farming" to be used to promote vegetative growth on top of the clay cover.

While upset conditions and compost use are anticipated by Waste Management to be infrequent and short in duration, they are considered to be the most likely cause of significant odour events related to the site. Excluding evaluation of these types of occurrences results in an underestimation of the potential impact the proposed facility may have on the surrounding community.

The City also has concerns that, excluding the conditions described above, the combined odour impact from site-wide operations is predicted to exceed the 1 Odour

Unit / cubic metre (OU/m³) detection threshold and the 3 OU/m³ recommended “annoyance threshold” near the facility property line from time to time.

The existing landfill at the WCEC has had historical odour issues leading to the Ministry issuing a Provincial Officer’s Order in 2007 requiring Waste Management to implement an Odour Contingency Plan. The City has previously requested that Waste Management use historical odour complaint data to determine the extent of potential odour impact at the site resulting from upset conditions.

As part of the approved Terms of Reference (ToR), Waste Management committed to developing an Odour Enforcement Mechanism. This was not articulated in the Amended EA, but rather Waste Management committed to developing an Odour Best Management Plan during the *Environmental Protection Act* (EPA) permitting process, following approval of the Amended EA. The City supports the Ministry in ceasing operations if persistent and on-going odour issues occur at the site until such time the odour issues are resolved.

The City recommends that Waste Management be required to better define the potential for community impacts related to odour as a result of process upset conditions and to provide a more prescriptive definition for odour impact such as “noticeable odour at any property that lasts for 10 minutes or longer”. The City also recommends that Waste Management be required to articulate proposed odour mitigation and compensation strategies to be distributed for comment by the affected communities and City staff, as part of the approval process.

Property Value Protection

The Amended EA does not identify which properties will be eligible under the proposed Property Value Protection Plan. Given that the environmental assessment process serves as an important mechanism in determining the economic impacts of the project, the City reiterates its request that this factor be incorporated into the Amended EA. Waste Management should be required to provide a clearly defined zone to provide affected residents with certainty that they will be compensated for any loss in property value. The City reiterates its recommendation that Waste Management establish a Property Value Protection Plan which includes all residences within a five (5) kilometer radius of the new landfill footprint.

The City also requests that Waste Management provide indemnification to the City such that Waste Management is fully prepared to provide any and all compensation, where applicable, with no cost or responsibility attributed to the City due to expansion of the landfill and the resulting impacts to surrounding properties.

Traffic

Traffic around the WCEC landfill is a large concern to the City and local residents. City Council recommended that issues related to road design to accommodate the site need to be addressed if the Amended EA is approved and that Waste Management be advised the City will require that Waste Management contribute a proportionate share to

the cost of widening Carp Road through the site plan process.

Groundwater

Waste Management must develop a comprehensive program to ensure that there are no future groundwater and surface water impacts on and around the site. City Council previously recommended Waste Management provide a comprehensive groundwater monitoring program, including monitoring of private wells within 3 kilometres of the landfill and include Best Management Practices and Mitigation to handle current and future impacts. This recommendation is herein reiterated.

All Ministry and Sewer Use order's and issues of non-compliance identified should be reported to the Mayor, West-end Councillors (West Carleton-March, Kanata North, Kanata South, Stittsville and Rideau-Goulbourn) and the General Manager of Environmental Services within 24 hours of identification. An annual report should be provided to the Mayor, five West-end Councillors and the General Manager of Environmental Services that ensures there are no environmental impacts resulting from the operations at the facility.

Conclusion

On behalf of Ottawa City Council, I appreciate the opportunity to provide further comment as part of the comment period for the Amended EA for a new landfill footprint at the WCEC. These further submissions seek to reiterate the importance of the concerns previously made by the City of Ottawa and are made in furtherance of addressing the various ecological, cultural, economic and social impacts of the proposed project upon the local community and the municipality as a whole. Finally, in light of the foregoing, may I recommend that a meeting between my Office and the Minister's Office take place in the near future in order to address any questions that you may have on this matter.

Yours truly,

Mayor

Encls.

cc:

Table 1. City of Ottawa Council Comment Summary Table

Proposal: West Carleton Environmental Centre Environmental Assessment

Proponent: Waste Management of Canada Corporation

Submitter	Summary of Comments	Proponent's Response	Status
Local Agencies			
City of Ottawa Council	<p>COMMITTEE RECOMMENDATIONS AS AMENDED</p> <p>That Council endorse the comments contained in Document 3 as the City's comments on Waste Management of Canada Corporation's Environmental Assessment for a New Landfill Footprint at the West Carleton Environmental Centre (WCEC) (September 2012), and direct staff to forward the approved comments to the Ministry of the Environment and Waste Management of Canada Corporation, as amended by the following.</p> <p>1. That the capacity being considered at the WCEC landfill be reduced to 4 million cubic metres capacity, based on 400,000 tonnes per year for the period of ten years; and,</p> <p>That the Ministry put in place programs and policies necessary to move the ICI sector from its current 17 percent diversion rate to the Ministry's target of 60 percent diversion before considering new or expanded landfills to dispose of residual ICI wastes; and</p>	<p>We proposed a new landfill of 6.5 million m³ based upon receipt of approximately 400,000 tonnes of solid waste per year, over a period of approximately 10 years. This volume includes solid waste and daily and interim cover material.</p> <p>We have proposed the WCEC as an integrated waste management facility that will provide diversion and disposal services. In the projection of the need for capacity for the new landfill we have assumed an average 2% annual increase in diversion within the IC&I sector.</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
	<p>2. That the proposed WCEC landfill expansion contain a comprehensive groundwater protection program to collect and treat all leachate produced during the contamination lifespan of the facility; and</p>	<p>Further details on the rationale for the undertaking are provided in Chapter 3 of the Final EA Report.</p> <p>We have developed and implemented a comprehensive environmental monitoring plan (EMP), which includes groundwater monitoring. The EMP is approved by the MOE and results of the monitoring are regularly reported to the MOE.</p> <p>We have established Contaminant Attenuation Zones (CAZs) as per MOE Guideline B-7 (Reasonable Use) where potential groundwater contamination from the existing closed landfill was identified beyond the site boundary. We monitor groundwater conditions within the CAZs to assess groundwater quality and the attenuation of impacted groundwater to Reasonable Use limits.</p> <p>In addition, we are responsible for undertaking and funding of the post-closure care of the existing closed landfill in keeping with the CofA issued by the MOE. This includes ongoing groundwater monitoring for the duration of time over which the existing landfill has the potential to generate contaminants (contaminating life). We must post and maintain financial assurance in the form of an irrevocable letter of credit issued by a Canadian Chartered Bank in favour of the Province to ensure the safe closure and long-term management of the existing landfill.</p> <p>The proposed new landfill will be designed to meet Ontario Regulation 232/98, which includes double-liner</p>	

Submitter	Summary of Comments	Proponent's Response	Status
	<p>That the groundwater protection program include best Management Practices and Mitigation to handle current and future potential impacts; and</p> <p>That proposed WCEC landfill contain a comprehensive groundwater monitoring program to assure effectiveness of the groundwater protection program; and</p> <p>That the groundwater monitoring program include on-site and off-site monitoring including private wells within 3 kilometres of the landfill; and,</p> <p>3. That the MOE require Waste Management to:</p> <ul style="list-style-type: none"> a. Require WM to invite the five West-end Councillors (West Carleton-March, Kanata North, Kanata South, Stittsville and Rideau-Carleton) to participate on the PLC. b. That city staff and the Ministry of the 	<p>design, leachate collection, and groundwater monitoring requirements, and post-closure care will be applicable to the new landfill.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p> <p>We have committed to the development of Best Management Practices and mitigation regarding groundwater quality and flow.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p> <p>We have committed to the development of a program for monitoring groundwater quality and flow.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p> <p>We have committed to the monitoring of groundwater quality and flow on-site and within the site-vicinity. The location of any private wells that may be included in this program will be identified within the EMP.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p> <p>We have committed to continue to participate on and support the Community Liaison Committee (CLC), or a similar body, formed for the WCEC.</p> <p>Further details on the CLC are provided in Section 7.8 of the Final EA Report.</p>	

Submitter	Summary of Comments	Proponent's Response	Status
	<p>existing transfer stations in Ottawa and Lanark, a request to the Ministry of the Environment that a condition be inserted that residual waste from waste brought to the facility from outside Ottawa or Lanark not be eligible for depositing at any landfill in Ottawa; and,</p> <p>5. That the comments in Document 3, Section 6.7.7 Transportation be reworded to the following "The comments that we have on the Transportation Detailed Impact Assessment are related to road design required to accommodate the site, which will be addressed if the EA is approved"; and,</p> <p>6. That the Waste Management Corporation be advised that the City will require through the site plan process that it contribute a proportionate share to the cost of widening Carp Road.</p>	<p>the Good Neighbour Zone. This may include residual waste from future and existing transfer stations in the City of Ottawa and County of Lanark.</p> <p>Further details on the rationale for the undertaking are provided in Supporting Document #1 of the approved ToR and Chapter 3 of the Final EA Report.</p> <p>We have committed to communicate with the City of Ottawa regarding transportation-related matters to be addressed if the EA is approved, including road design and level of service changes and/or improvements.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p> <p>We have committed to communicate with the City of Ottawa regarding transportation-related matters to be addressed if the EA is approved, including acquiring all necessary permits and/or approvals (e.g., site plan).</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Unacceptable

Table 2. City of Ottawa Environment Committee Comment Summary Table

Proposal: West Carleton Environmental Centre Environmental Assessment

Proponent: Waste Management of Canada Corporation

Submitter	Summary of Comments	Proponent's Response	Status
Local Agencies			
City of Ottawa Environment Committee	<p><i>Odour control at the site</i> – the City does not accept the approach taken by WM and their consultants to exclude process upset conditions from the odour impact assessment studies. The City considers “upset conditions”, examples of which include temporary inoperability of the landfill gas collection system, cracks or fissures in the landfill cover, or the installation of additional landfill gas collection infrastructure, to have significant potential for generating odours which may have an impact to areas surrounding the landfill. The detailed impact assessment for odour also excluded odours arising from on-site daily cover contaminated soil stockpiles and the use of compost “anticipated to generate odour similar to the background odour from agriculture farming” to be used to promote vegetative growth on top of the clay cover.</p> <p>While upset conditions and compost use are anticipated by WM to be infrequent and short induration, they are considered to be the most likely cause of odour events related to the site. Excluding evaluation of these types of occurrences results in an underestimation of the potential impact the proposed facility may have on the surrounding community.</p> <p>The City also has concerns that, excluding the conditions described above, the combined odour impact from site-wide operations is predicted to exceed the 1</p>	<p>We have modelled potential odour impacts of the new landfill footprint and other WCEC facilities, as per the requirements of O.Reg 419/05. The model addresses duration, extent and frequency of effects, but not emergency situations (i.e. upset conditions), as these types of events would be covered in the contingency measures and management of the landfill operations.</p> <p>We have assumed the baseline conditions or “existing case” to be the existing closed landfill (i.e., closed on September 30, 2011), which would not reflect historic odour levels of the former operating landfill. However, historic odour complaint data recorded for the former operating landfill provided context for the frequency analysis completed for the preferred option in the Detailed Impact Assessment Report.</p> <p>We have also committed to prepare Contingency Plans related to atmosphere (i.e., odour, dust, noise, landfill gas) as part of the EPA approvals process and prior to construction.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
	<p>Odour Unit / cubic metre (OU/m³) detection threshold and the 3 OU/m³ recommended "annoyance threshold" near the facility property line from time to time.</p> <p>The existing Ottawa Waste Management Facility has had historical odour issues leading to the MOE issuing a Provincial Officer's Order in 2007 requiring WM to implement an Odour Contingency Plan. The City has previously requested that WM use historical odour complaint data to determine the extent of potential odour impact at the site resulting from upset conditions.</p>	the Final EA Report.	
City of Ottawa Environment Committee	<p>As part of the approved ToR, WM committed to developing an Odour Enforcement Mechanism. This was not articulated in the EA, but rather WM committed to developing an Odour Best Management Plan during the EPA permitting process, following approval of the EA. The City supports the Ministry of the Environment in ceasing operations if persistent and on-going odour issues occur at the site until such time the odour issues are resolved.</p> <p>The City recommends that WM be required to better define the potential for community impacts related to odour as a result of process upset conditions and to provide a more prescriptive definition for odour impact such as "noticeable odour at any property that lasts for 10 minutes or longer". The City also recommends that WM be required to articulate proposed odour mitigation and compensation strategies to be distributed for comment by the affected communities, including the City, as part of the EA.</p>	<p>We have included the Odour Enforcement Mechanism within Appendix C of the EA and Appendix D in the ToR.</p> <p>We have committed to develop an Odour and Landfill Gas BMP Plan and to ensure the principles of the Odour Enforcement Mechanism are implemented.</p> <p>We have committed to consult with stakeholders, such as the City and public, in the development of BMPs, like the Odour and Landfill Gas BMP Plan.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Unacceptable
City of Ottawa Environment Committee	<p>Property value protection – the EA does not identify which properties will be eligible for property value protection. WM must provide a clearly defined zone to provide effected residents with certainty that they will be compensated for any loss in property</p>	<p>We have committed to the implementation of a Property Value Protection Plan, as outlined in Appendix C of the EA. When the EA and related ECA approvals have been secured and associated conditions</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
	<p>value. The City recommends that WM establish a Property Value Protection Plan which includes all residences within a five (5) kilometer radius of the new landfill footprint.</p> <p>The City also requests that WM provide indemnification to the City such that WM is fully prepared to provide any and all compensation, where applicable, with no cost or responsibility attributed to the City due to expansion of the landfill and the resulting impacts to surrounding properties.</p>	<p>are known, specific properties covered by the Property Value Protection Plan will be identified by municipal address and owners of said properties will be formally notified by letter. We are also prepared to discuss with the City potential approaches to addressing City concerns regarding their civil exposure as a result of the new landfill and any potential impacts to surrounding properties.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	
City of Ottawa Environment Committee	<p>Prioritization of waste diversion activities – the EA defines the undertaking as being... “a new landfill footprint that will provide residual waste disposal capacity of approximately 6.5 million cubic meters”. The term “residual waste” is not defined in the ToR or EA glossaries. However, WM defined the term “residual waste” in the approved ToR as residual material remaining following waste diversion (i.e. to recycling). The use of this term in the EA does not draw the same clear distinction.</p> <p>The City is supportive of WM's waste diversion efforts and believes that landfill disposal should be of secondary importance.</p>	<p>We have defined the undertaking in the EA as “a new landfill footprint that will provide residual waste disposal capacity of approximately 6.5 million cubic meters”. We have also defined residual waste in the ToR as material remaining following waste diversion. We have assumed a 2% average annual increase in the diversion rate within the IC&I sector over the projected life of the new landfill. Therefore, the residual waste to be disposed of at the new landfill would be material remaining after the projected diversion within the IC&I sector.</p> <p>Further details on residual waste and diversion are provided in Supporting Document #1 of the approved ToR and in Chapter 3 of the Final EA Report.</p>	Unacceptable
City of Ottawa Environment Committee	<p>Proposed process for project amendment – the final EA includes a proposed process to be followed to make “major” or “minor” amendments to the project to allow WM to respond to unforeseen changes in conditions. In the case where WM considers</p>	<p>We have committed to consult with stakeholders, such as the City and public, on minor amendments to the EA prior to their implementation.</p> <p>Further details on the amendment</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
	<p>the change to be minor, it is proposed that the categorization be discussed with the MOE Environmental Assessment and Approvals Branch (EAAB) (in Toronto) and an amendment review document be prepared and submitted to affected stakeholders for review and comment. The minor change would then be implemented, subject to MOE EAAB approval.</p> <p>The City disagrees with the proposed self-categorization of amendments, especially in cases where proposed project changes may affect municipal infrastructure, bylaws or property values. Affected stakeholders, including City staff, should be consulted, as "minor" amendments, (e.g. what, where and how project facilities are built) may result in significant environmental effects for impacted stakeholders. This consultation should take place well in advance of any postings on the MOE's Environmental Bill of Rights Website.</p>	<p>procedure are provided in Chapter 10 of the Final EA Report.</p>	
City of Ottawa Environment Committee	<p>Service area – the proposed service area for the waste diversion facilities and landfill should be restricted to exclusively the municipal boundary of the City of Ottawa and Lanark County. Contaminated soils brought to the site should also be restricted to those generated within the City limits and Lanark County. The service area for all waste diversion facilities at the site should be restricted to the City of Ottawa and Lanark County so as to prevent materials from other communities being brought into the landfill through these recycling facilities.</p>	<p>We have proposed an Ontario-wide service area for the new landfill, based upon historic operations and future business opportunities for the site. This includes the fact that we have historically made provisions with the City of Ottawa to reserve between 75% and 90% of our landfill disposal capacity at this site for waste generated within the City of Ottawa and the Good Neighbour Zone (GNZ). We have projected that the remaining 10% to 25% of the waste received would be largely event-based, including non-hazardous soils from site remediation projects and non-hazardous waste from industrial processes. We have also projected that residential and IC&I waste regularly collected from outside the City of Ottawa and GNZ would not generally be part of the anticipated</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
		<p>waste stream. Our proposed Ontario-wide service area is consistent with the service area permitted for the former Carp Road Landfill.</p> <p>Further detail on the proposed service area is provided in Chapter 3 of the Final EA Report.</p>	
City of Ottawa Environment Committee	<p>Site Plan Control Approval – the EA notes that the landfill expansion is not subject to Site Plan Control Approval. Legal opinion has been sought on this matter and indicates that the City does have the authority to require Site Plan Control Approval to amend the current site plan to reflect new development, including the acquisition of additional lands. The proposed project includes the addition of a number of “facilities” listed as part of the expanded operation of the Ottawa Waste Management Facility, including what the City and the MOE refer to as “waste processing and transfer facilities” (WP&TF putrescible and WP&TF non-putrescible). These buildings will require both Site Plan Control Approval and Environmental Compliance Approvals from the MOE.</p>	<p>We have determined that the new landfill is not subject to site plan control approval by the City of Ottawa. However, we have also committed to acquire all necessary permits and/or approvals for the new landfill and other facilities at the WCEC.</p> <p>Further details on approvals are provided in Chapter 9 of the Final EA Report.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Unacceptable
City of Ottawa Environment Committee	<p>Traffic – Traffic around the Carp Landfill is a large concern to the City and local residents. The City is requesting that WM provide a merge lane for traffic exiting the Carp Road facility. The City requires that WM participate in any future discussions on the widening of Carp Road.</p>	<p>We have committed to maintain communication with the City regarding transportation matters, including existing and future level of service. This may involve certain road improvements, including a potential merge lane for traffic exiting the WCEC facility and widening of Carp Road.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Unacceptable
City of Ottawa Environment	<p>Reporting – WM must develop a comprehensive program to ensure that there are no future groundwater and surface water</p>	<p>We have committed to develop and implement an EMP and BMPs for monitoring and reporting on</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
Committee	<p>impacts on and around the site. All MOE and Sewer Use order's and issues of non-compliance identified should be reported to the Mayor, West-end Councillors (West Carleton-March, Kanata North, Kanata South, Stittsville and Rideau-Goulbourn) and the General Manager of Environmental Services within 24 hours of identification. An annual report should be provided to the Mayor, five West-end Councillors and the General Manager of Environmental Services that ensure there are no environmental impacts resulting from the operations at the facility. In addition, WM should report all odor, litter, noise and traffic complaints received by WM or forwarded to WM by other parties to the General Manager of Environmental Services and the five West-end Councillors within 24 hours of receipt. The report should include how and when the problem was addressed. A summary of all complaints and how they were resolved must be prepared and issued with the agenda for the Public Liaison Committee meeting.</p>	<p>groundwater and surface water conditions at the WCEC and to provide notice and communication to the MOE, City, and CLCLC.</p> <p>We are required to develop and submit to the MOE an annual report for the existing closed landfill. This report is copied to the City and CLCLC and posted on the WCEC website.</p> <p>We have committed to develop and submit to the MOE an annual report for the new landfill and other facilities at the WCEC. This report will be copied to the City and CLCLC and posted on the WCEC website.</p> <p>We have developed and maintained a system for the receipt of and follow-up to public complaints related to operations of the existing closed landfill, including any odour, litter, noise, and traffic complaints.</p> <p>We have committed to continue a system for the receipt of and follow-up to public complaints related to operation of the new landfill and other WCEC facilities, including any odour, litter, noise, and traffic complaints.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	
City of Ottawa Environment Committee	<p>Public Liaison Committee – WM must have a public liaison committee that invites members of the public, local businesses, local Councillors and City Staff that meets at a minimum on a quarterly basis. Issues that should be reviewed are complaints received, environmental compliance operational changes and other issues that may be brought forward of concern to the local</p>	<p>We have committed to continue to participate on and support the Community Liaison Committee (CLC), or a variation thereof, formed for the WCEC.</p> <p>Further details on the CLC are provided in Section 7.8 of the Final EA Report.</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
	community.	Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	
City of Ottawa Environment Committee	Waste Diversion – The City supports waste diversion away from landfill. Significant improvements will need to be made to the ICI and C&D waste diversion rate to achieve the Province's goal of 60%. The City is requesting that the Province set established waste diversion targets for ICI and C&D waste diversion for the service area of the landfill and that the total allowable annual tonnage accepted at the Carp Landfill, if approved, decrease at the same percentage rate from the first year annual tonnage of 400,000 tonnes. Contaminated soils that are landfilled must be counted towards the site's annual capacity, even if they are used as daily, interim or final cover.	<p>We have proposed a new landfill footprint of 6.5 million cubic meters to provide residual waste disposal capacity needed after an assumed 2% average annual increase of the diversion rate in the IC&I sector over the projected life of the new landfill. The residual waste to be disposed of at the new landfill would be material remaining after the projected diversion within the IC&I sector.</p> <p>We have projected an approximate annual tonnage of 400,000 tonnes of solid waste to be disposed of at the new landfill. An additional 15% of daily and interim cover material will be required using the proposed ratio of 6:1 based on our operating experience. Therefore, the total volume of waste and daily and interim cover material for the new landfill will be approximately 6.5 million cubic metres. Additional airspace will be required for the final cover material used to close the new landfill.</p> <p>Further details on waste diversion and service area are provided in Chapter 3 of the Final EA Report.</p> <p>Further details on waste volume and cover material are provided in Chapter 6 of the Final EA Report.</p>	Unacceptable
City of Ottawa Environment Committee	Site Capacity – The City requests that the overall approved capacity of the landfill site should be reduced from the requested 6.5M cubic meters to 5M cubic meters which would reflect WM's commitment to waste diversion from landfilling.	We proposed a new landfill of 6.5 million m ³ based upon receipt of approximately 400,000 tonnes of solid waste per year, over a period of approximately 10 years. This volume includes solid waste and daily and	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
		<p>interim cover material.</p> <p>We have proposed the WCEC as an integrated waste management facility that will provide diversion and disposal services. We have assumed an average annual increase in diversion within the IC&I sector of 2% in the projection of the need for capacity for the new landfill.</p> <p>Further details on the rationale for the undertaking are provided in Chapter 3 of the Final EA Report.</p>	
City of Ottawa Environment Committee	<p>Final Expansion – The City is requesting a guarantee from WM and the province that this be the last time that WM be allowed to request an expansion of the Carp Landfill Site.</p>	<p>We have proposed a new landfill footprint of 6.5 million cubic metres based upon historic operations and future business opportunities over a 10 year planning horizon given future uncertainty associated with the factors that may affect volume of disposal capacity required, but we did not exclude the future residual waste disposal needs for residential and IC&I sectors in the City of Ottawa and Good Neighbour Zone (GNZ). We have not precluded an ongoing need for disposal capacity for residual waste for the residential and IC&I sectors in the City of Ottawa and GNZ beyond a 10 year planning horizon.</p> <p>Further details on the rationale for the undertaking are provided in Chapter 3 of the Final EA Report.</p>	Unacceptable

Table 3. City of Ottawa Councillor Comment Summary Table

Proposal: West Carleton Environmental Centre Environmental Assessment

Proponent: Waste Management of Canada Corporation

Submitter	Summary of Comments	Proponent's Response	Status
Local Agencies			
City of Ottawa Environment Committee - Councillor Marianne Wilkinson	<p>The landfill has to be limited to no more than 10 years as an interim step towards using technology to deal with waste. The City should say that the EA is inadequate in dealing with alternative methods; that it speaks about recycling and reuse but there are no obligations to do so, and that a landfill so close to thousands of homes should not be located at this site.</p> <p>If one is approved the province should include a plan to reach the minimum of 60% recycling on site and the volume approved reduced to the amount needed for remnant waste over 10 years. The timeline has been removed from the application and needs to be a firm end time with a reduced size that makes recycling happen.</p> <p>The area served must not be all of Ontario but only to serve local needs.</p>	<p>We have proposed a new landfill footprint of 6.5 million cubic metres based upon historic operations and future business opportunities over a 10 year planning horizon given future uncertainty associated with the factors that may affect volume of disposal capacity required, but we did not exclude the future residual waste disposal needs for residential and IC&I sectors in the City of Ottawa and Good Neighbour Zone (GNZ). We have not precluded an ongoing need for disposal capacity for residual waste for the residential and IC&I sectors in the City of Ottawa and GNZ beyond a 10 year planning horizon.</p> <p>We have proposed a new landfill footprint of 6.5 million cubic meters to provide residual waste disposal capacity needed after an assumed 2% average annual increase of the diversion rate in the IC&I sector over the projected life of the new landfill. The residual waste to be disposed of at the new landfill would be material remaining after the projected diversion within the IC&I sector.</p> <p>We have proposed an Ontario-wide service area for the new landfill, based upon historic operations and future business opportunities for the</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
	<p>The owner must be required to not only provide turn lanes into the site (including a right turn speed up lane) but also provide funds for a future widening (based on ownership frontage which occurs on both sides of the road).</p> <p>My preference is to have this proposal refused based on the previous problems on the first landfill that have caused great concern and reduced quality of life for nearby residents. This is not a location suitable for a landfill today.</p>	<p>site. This includes the fact that we have historically made provisions with the City of Ottawa to reserve between 75% and 90% of our landfill disposal capacity at this site for waste generated within the City of Ottawa and the Good Neighbour Zone (GNZ). We have projected that the remaining 10% to 25% of the waste received would be largely event-based, including non-hazardous soils from site remediation projects and non-hazardous waste from industrial processes. We have also projected that residential and IC&I waste regularly collected from outside the City of Ottawa and GNZ would not generally be part of the anticipated waste stream. Our proposed Ontario-wide service area is consistent with the service area permitted for the former Carp Road Landfill.</p> <p>We have committed to maintain communication with the City regarding transportation matters, including existing and future level of service. This may involve certain road improvements, including a potential merge lane for traffic exiting the WCEC facility and widening of Carp Road.</p> <p>We have closed the existing landfill and implemented mitigation and monitoring measures to address odour and groundwater issues.</p> <p>We have committed to developing and implementing mitigation and monitoring measures for groundwater, surface water, and air for the new landfill footprint.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of</p>	

Submitter	Summary of Comments	Proponent's Response	Status
		<p>the Final EA Report.</p> <p>We have assessed the suitability of the location for the proposed new landfill in the EA.</p> <p>Further details on the land use and socio-economic assessments are provided in Chapter 6 of the Final EA Report.</p>	
<p>City of Ottawa Environment Committee - Councillor Shad Qadri</p>	<p>Time has shown to us that the prior decision to incorporate landfills into our surroundings has proven challenging. Burying garbage is an antiquated means of disposal. With the availability of modern diversion technologies there is no reasonable rationale to have another landfill footprint added to our community. One of the challenges we face with this potential site is that it is located in an ever growing community and it would be situated on fractured limestone that is classified as highly vulnerable to groundwater contamination, not to mention the fact that without the inclusion of a diversion component to the EA, it only deals with the landfill component.</p> <p>I am opposed to the creation of another landfill footprint at Carp Road.</p>	<p>We have proposed the WCEC as an integrated waste management facility that will provide both diversion and disposal services. We have assumed an average annual increase in diversion within the IC&I sector of 2% in the projection of the need for capacity for the new landfill.</p> <p>Further details on the rationale for the undertaking are provided in Chapter 3 of the Final EA Report.</p> <p>We have undertaken an EA for the proposed new landfill that has examined potential impacts on the environment, identified potential mitigation measures, and determined the net effects on natural, social, cultural and economic environments.</p> <p>Further details on the impact assessments are provided in Chapter 6 of the Final EA Report.</p> <p>We have closed the existing landfill and implemented mitigation and monitoring measures to address odour and groundwater issues.</p> <p>We have committed to developing and implementing mitigation and monitoring measures for groundwater, surface water, and air for the new landfill footprint.</p> <p>Further details on WM commitments</p>	<p>Unacceptable</p>

Submitter	Summary of Comments	Proponent's Response	Status
		are provided in Chapter 8 Table 8-2 of the Final EA Report.	

Table 4. City of Ottawa Staff Comment Summary

Proposal: West Carleton Environmental Centre Environmental Assessment

Proponent: Waste Management of Canada Corporation

Submitter	Summary of Comments	Proponent's Response	Status
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p>Section 4 of the Terms of Reference (ToR) provided a Description of and Rationale for the Undertaking, where the undertaking was defined in the ToR as being:</p> <p><i>“to provide additional disposal capacity for solid non-hazardous waste at the WCEC in the form of a new landfill footprint, in order to allow WM to continue to manage its current commercial operations and support the continuation of its business operations. The existing facility is expected to reach its currently approved disposal capacity in September 2011. WM is, through this undertaking, proposing to provide disposal capacity for the residual wastes remaining after waste diversion”.</i></p> <p>Chapter 3 of the EA - Overview of the Undertaking defines the undertaking as being:</p> <p><i>“a new landfill footprint that will provide residual waste disposal capacity of approximately 6.5 million cubic meters”.</i></p> <p>The term —residual waste is not defined in the ToR or EA glossaries. It is clear in the ToR that residual waste refers to waste remaining after waste diversion, whereas use of the term in EA does not make this distinction clear. Given that the term as expressed in the approved ToR refers to post-diversion residual waste, it follows that the undertaking expressed in the EA</p>	<p>We have defined the undertaking in the EA as “a new landfill footprint that will provide residual waste disposal capacity of approximately 6.5 million cubic meters”. We have also defined residual waste in the ToR as material remaining following waste diversion. We have assumed a 2% average annual increase in the diversion rate within the IC&I sector over the projected life of the new landfill. Therefore, the residual waste to be disposed of at the new landfill would be material remaining after the projected diversion within the IC&I sector.</p> <p>Further details on residual waste and diversion are provided in Chapter 3 of the Final EA Report.</p>	Unacceptable

Submitter	Summary of Comments	Proponent's Response	Status
	should be consistent.		
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Section 4.4.1.1 - Air Quality: NO _x emissions from both landfill operations and the 400 series highways will combine with methane releases to produce ground level ozone. Will the proponent monitor this pollutant?	We have committed to developing and implementing a Combustion Haul Route BMP after EA approval for the new landfill and prior to construction, which will include monitoring requirements. We have committed to consult with stakeholders, such as the City and public, in the development of BMPs, like the Combustion Haul Route BMP. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	The proponent is not committing to ground level ozone monitoring. This should be a commitment that would go beyond the EA process. In fact, the concentrations of methane will probably increase in time, contributing to the formation of ground level ozone.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Section 4.4.1.1 - Air Quality: Please advise of the location(s) of the meteorological station(s) that were used in the dispersion modeling.	We have noted the location of the meteorological station that was used in the dispersion modeling as “on-site” in Chapter 4 of the Final EA Report.	Nowhere in the Final EA is the location of the meteorological station stated. There is a mention of using meteorological data but where the data is coming from is unclear.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Section 5.1.4.1 - Conceptual Design of Landfill Footprint Options (page 5-16): In place waste density of 0.725 t/m ³ is low given modern landfill equipment.	We have proposed an in-place waste density of 0.725 t/m ³ based on our operating experience with our other landfills in North America.	Unsatisfactory - The Trail Waste Facility has averaged 0.764 t/m ³ over the past 8 years – 5% better than WM landfills. The use of a lower waste density by WM justifies a larger landfill.
City of Ottawa Environment	Section 5.1.7 Net Effect Analysis – Landfill Footprints:	We have committed to developing and implementing a Odour and	Unsatisfactory - Why is WM waiting

Submitter	Summary of Comments	Proponent's Response	Status
Committee – Document 3 - City of Ottawa Staff	<p>No inclusion of odour effects under upset conditions:</p> <p>Page 5-36 – What happens when the gas collection system is down?</p>	<p>Landfill Gas BMP after EA approval for the new landfill and prior to construction, which will include monitoring requirements.</p> <p>We have committed to consult with stakeholders, such as the City and public, in the development of BMPs, like the Odour and Landfill Gas BMP.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	<p>for EA approval to develop BMP's. The City developed a complete Design and Operations Report as part of the Trail Waste Facility EA approval process. By developing BMP's after EA approval the weight/consideration of stakeholder comments is reduced.</p>
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p>Table 5-7, Raw Leachate Characteristics:</p> <p><i>It is noted sulphide was analysed with a result of 4.2 mg/l.</i></p> <p>This is a contaminant of concern as it exceeds Sewer Use Discharge criteria and therefore must be removed by the leachate treatment process. Sulphide is often present as odourous hydrogen sulphide in leachate. Sulphide should therefore be included as a contaminant in Section 6.7.1.3 Odour, Preferred Leachate Management System in the Odour Detailed Impact Assessment.</p>	<p>We concur that a new leachate agreement with the City will be required and will define leachate quantity/quality parameters.</p> <p>We have committed to acquire all necessary permits and/or approvals for the new landfill and other facilities at the WCEC.</p> <p>Further details on leachate treatment and disposal are provided in Chapter 5 of the Final EA Report.</p> <p>Further details on approvals are provided in Chapter 9 of the Final EA Report.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	<p>Unsatisfactory - Sulphide has not been included in Section 6.7.1.3 Odour. Sulphide removal in leachate treatment process should be included in the detailed in the Odour Impact Assessment.</p>
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><u>Historical Complaints:</u></p> <p>It is difficult to ascertain from the Detailed Impact Assessment that historical complaints have been reviewed or incorporated in determining the probability of future complaints. Given that odour has been an issue for nearby residences, complaints</p>	<p>We have assumed the baseline conditions or "existing case" to be the existing closed landfill (i.e., closed on September 30, 2011), which would not reflect historic odour levels of the former operating landfill. However, historic odour complaint data</p>	<p>Ensure appropriate City technical staff are provided sufficient time to review and comment on the Contingency Plans.</p>

Submitter	Summary of Comments	Proponent's Response	Status
	<p>received previous to baseline conditions should be discussed.</p> <p>Historical complaints recorded are not referenced in Detailed Impact Assessment. It is suggested that historical complaints be referenced and used to determine most impacted receptors for the Frequency Analysis.</p> <p>Please identify where historical complaints were used to determine probability of future complaints and development/implementation of mitigation measures.</p>	<p>recorded for the former operating landfill provided context for the frequency analysis completed for the preferred option in the Detailed Impact Assessment Report.</p> <p>We have also committed to prepare Contingency Plans related to atmosphere (i.e., odour, dust, noise, landfill gas) as part of the EPA approvals process and prior to construction.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	
<p>City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff</p>	<p>During the Air Technical session of 2011, WM mentioned that they would be discussing a potential plan to address upset conditions. More than 25% of the comments obtained on the Air Technical Sessions were related to upset conditions. These concerns must be addressed in the Detailed Impact Assessment Report.</p> <p>Upset conditions are not discussed in the Odour Detailed Impact Assessment. No upset condition assessments have been provided in the Atmospheric - Odour - Detailed Assessment Impact. We request to have upset conditions evaluated, no matter how remote.</p> <p>During the Air Technical Session, WM indicated that a plan to address upset conditions would be discussed (re odour). This was not discussed in the draft EA. Please identify where upset conditions plan has been addressed in the final EA document.</p>	<p>We have modelled potential odour impacts of the new landfill footprint and other WCEC facilities, as per the requirements of O.Reg 419/05. The model addresses duration, extent and frequency of effects, but not any emergency situations (i.e. upset conditions), as these types of events would be covered in the contingency measures and management of the landfill operations.</p> <p>We have assumed the baseline conditions or “existing case” to be the existing closed landfill (i.e., closed on September 30, 2011), which would not reflect historic odour levels of the former operating landfill. However, historic odour complaint data recorded for the former operating landfill provided context for the frequency analysis completed for the preferred option in the Detailed Impact Assessment Report.</p> <p>We have also committed to prepare Contingency Plans related to atmosphere (i.e., odour, dust, noise, landfill gas) as part of the EPA</p>	<p>Ensure appropriate City technical staff are provided sufficient time to review and comment on the Contingency Plans.</p>

Submitter	Summary of Comments	Proponent's Response	Status
		<p>approvals process and prior to construction.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Odour best management practice plan not provided for review. Odour best management practice plan to be prepared as part of the ECA process.	<p>We have committed to developing and implementing an Odour and Landfill Gas BMP after EA approval for the new landfill and prior to construction, which will include monitoring requirements.</p> <p>We have committed to consult with stakeholders, such as the City and public, in the development of BMPs, like the Odour and Landfill Gas BMP.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Landfill gas best management practice plan not provided for review. Landfill gas best management practice plan to be prepared as part of the ECA process.	<p>We have committed to developing and implementing an Odour and Landfill Gas BMP after EA approval for the new landfill and prior to construction, which will include monitoring requirements.</p> <p>We have committed to consult with stakeholders, such as the City and public, in the development of BMPs, like the Odour and Landfill Gas BMP.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Noise management plan including mitigation, commitments and monitoring not provided for review. Noise best management practice plan to be prepared as part of the ECA process.	<p>We have committed to developing and implementing an Noise BMP after EA approval for the new landfill and prior to construction, which will include monitoring requirements.</p> <p>We have committed to consult with stakeholders, such as the City and</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.

Submitter	Summary of Comments	Proponent's Response	Status
		<p>public, in the development of BMPs, like the Noise BMP.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Sources of Odour - the top 4 as listed in the response to the comments are discussed in the Odour Detailed Impact Assessment (p. 6 to 11). However, the crack and fissures in the landfill surface are listed as upset conditions and not evaluated. Please provide supporting information to justify why the crack and fissure can be considered an upset condition when they are listed as a main cause of odour or include them in the assessment.	<p>We have modelled potential odour impacts of the new landfill footprint and other WCEC facilities, as per the requirements of O.Reg 419/05. The model addresses duration, extent and frequency of effects, but not any emergency situations (i.e. upset conditions), as these types of events would be covered in the contingency measures and management of the landfill operations.</p> <p>We have listed cracks and fissures in the landfill surface as a main cause of odour when they occur due to their intensity, but they have been characterized as an upset condition due to their infrequency.</p> <p>Further details on cracks and fissures and odour are provided in Chapter 6 of the Final EA Report.</p>	Based on past incidence with the WM Ottawa facility the Upset conditions occur frequently and should be included in the modeled odour impact assessment. Clay landfill caps require on-going maintenance as cracks and fissures do routinely occur and should not be considered an upset condition. This source of odour should be included in the Odour Detailed Impact Assessment.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>6.7.3 Surface Water</i></p> <p><i>Figure 6-25</i> - We would suggest extending the impermeable liner up to the top of both berms to prevent unwanted seepage though the banks.</p>	<p>We have committed to consult with stakeholders, such as the City, in the development of ECAs and BMPs, like the Surface Water BMP Plan, which would address this issue.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Ensure Mississippi Valley Conservation is consulted re water quality and quantity.	We have committed to consult with stakeholders, such as MVCA, in the development of ECAs and BMPs, like the Surface Water BMP Plan, which would address this issue.	Ensure appropriate City technical staff are provided sufficient time to review and comment on the

Submitter	Summary of Comments	Proponent's Response	Status
		Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p>Section 6.2 - Mitigation and/or Compensation Measures, page 13:</p> <p>Provide details for the measures included in the bulleted list (e.g. how far away from the SWM system will refuelling and handling of hazardous substances take place? What is considered to be —excessivell in bullet #5?, restoration details, etc.).</p>	<p>We have committed to prepare Contingency Plans related to groundwater, surface water, and atmosphere (i.e., odour, dust, noise, landfill gas) as part of the EPA approvals process and prior to construction.</p> <p>We have outlined potential contingency measures to be considered in the development of contingency plans.</p> <p>We have committed to consult with stakeholders, such as the City, in the development of Contingency Plans.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the Contingency Plans.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p>Section 6.2 - Mitigation and/or Compensation Measures, page 13:</p> <p>What happens when the 1:100 event is exceeded? Where does the runoff go to? If stage 1 bay in SWM facility is closed off, but 1:100 is exceeded, what is the proposed response (i.e. How will contamination be contained)?</p>	<p>We have committed to prepare Contingency Plans related to groundwater, surface water, and atmosphere (i.e., odour, dust, noise, landfill gas) as part of the EPA approvals process and prior to construction.</p> <p>We have outlined potential contingency measures to be considered in the development of contingency plans.</p> <p>We have committed to consult with stakeholders, such as the City, in the development of Contingency Plans.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the Contingency Plans.
City of Ottawa	Section 6.2 - Mitigation and/or Compensation	We have committed to prepare	Ensure appropriate

Submitter	Summary of Comments	Proponent's Response	Status
Environment Committee – Document 3 - City of Ottawa Staff	Measures, page 17: How will accidents and malfunctions be—limited?	<p>Contingency Plans related to groundwater, surface water, and atmosphere (i.e., odour, dust, noise, landfill gas) as part of the EPA approvals process and prior to construction.</p> <p>We have outlined potential contingency measures to be considered in the development of contingency plans.</p> <p>We have committed to consult with stakeholders, such as the City, in the development of Contingency Plans.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	City technical staff are provided sufficient time to review and comment on the Contingency Plans.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Page 19: Section 7: Description of SWM discharge is not detailed enough. For example, there is no discussion of volumes and the quality of water to be discharged in the end. Depending on quality, there could be an impact on surface or ground water.	<p>We have committed to developing and implementing a Surface Water BMP Plan as part of the EPA approvals process and prior to construction.</p> <p>We have committed to consult with stakeholders, like the City, in the development of ECAs and BMPs, such as the Surface Water BMP Plan, which would address potential volume and water quality issues.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Section 8.1.1 - Environmental Effects Monitoring, page 20: It suggests that water quality and quantity will be monitored at certain locations 6 times per year. This seems to be very limited monitoring given the need to close / separate Stage 1 from Stage 2 of the SWM facility when there is an issue. Please clarify how the ongoing monitoring will occur for the	<p>We have committed to developing and implementing a Surface Water BMP Plan and Contingency Plan as part of the EPA approvals process and prior to construction.</p> <p>We have committed to consult with stakeholders, like the City, in the development of BMPs and Contingency Plans, such as the</p>	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's and Contingency Plans.

Submitter	Summary of Comments	Proponent's Response	Status
	purposes of the emergency response (i.e. Stage 1 isolation from Stage 2 SWM).	Surface Water BMP Plan, which would address potential surface water monitoring and emergency measures. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Section 8.2 - Commitments, part b: Confirm the frequency of monitoring, in light of the above comment.	We have committed to developing and implementing a Surface Water BMP Plan as part of the EPA approvals process and prior to construction. We have committed to consult with stakeholders, like the City, in the development of BMPs, such as the Surface Water BMP Plan, which would address potential surface water monitoring. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee (Amended) – Document 3 - City of Ottawa Staff	Traffic around the Carp Landfill is a large concern to the City and local residents. The City is requesting that WM provide a merge lane for traffic exiting the Carp Road facility. The City requires that WM participate in any future discussions on the widening of Carp Road.	We have committed to maintain communication with the City regarding transportation matters, including existing and future level of service. This may involve certain road improvements, including a potential merge lane for traffic exiting the WCEC facility and widening of Carp Road. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Unacceptable
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	Section 6.7.8.3 - Mitigation and/or Compensation Measures for Land Use: <i>"WM committed to developing a property value protection plan as part of the EA."</i> We would like to see WM provide indemnification of the City in this regard and	We have committed to the implementation of a Property Value Protection Plan, as outlined in Appendix C of the EA. When the EA and related ECA approvals have been secured and associated conditions are known, specific properties covered by the Property Value	"The City continues to request that any Environmental Assessment approval be conditional upon the wording expressed in the City's original

Submitter	Summary of Comments	Proponent's Response	Status
	that they (WM) are fully prepared to provide any and all compensation where applicable with no cost or responsibility attributed to the City due to the landfill expansion and its possible effects. The City recommends that all properties within five (5) kilometres of the site be included in the property value protection program.	Protection Plan will be identified by municipal address and owners of said properties will be formally notified by letter. We are also prepared to discuss with the City potential approaches to addressing City concerns regarding their civil exposure as a result of the new landfill and any potential impacts to surrounding properties. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	comment.” We require WM to provide indemnification of the City in this regard and that they (WM) are fully prepared to provide any and all compensation where applicable with no cost or responsibility attributed to the City due to the landfill expansion and its possible effects.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	The discussion on possible mitigation measures for potential land use conflicts is vague, and more detailed discussion of the buffering and screening would be helpful.	We have committed to develop and implement BMPs and landscape/vegetation treatments to mitigate potential visual impacts caused by the new landfill and other facilities at the WCEC. Further details on visual screening are provided in Chapter 6 of the Final EA Report. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	There is no mention of the end use of the facility. The EA indicates that this will be determined as part of the EPA permitting process. It is unclear if, once the landfill reaches its ultimate capacity with the proposed expansion, will the waste processing and transfer facilities also cease to operate?	We have committed to consult with stakeholders, such as the City and public, regarding the End-Use and Closure Plans. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Ensure appropriate City technical staff are provided sufficient time to review and comment on the End-Use and Closure Plans.
City of Ottawa Environment Committee –	<i>8. Monitoring and Commitments for the Undertaking</i> Page 8-4 – How are you going to monitor	We have committed to developing and implementing an Odour and Landfill Gas BMP after EA approval	Ensure appropriate City technical staff are provided

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Document 3 - City of Ottawa Staff	odours on the landfill mound?	for the new landfill and prior to construction, which will include monitoring requirements. We have committed to consult with stakeholders, such as the City and public, in the development of BMPs, like the Odour and Landfill Gas BMP. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>8. Monitoring and Commitments for the Undertaking</i> Page 8-4 – At what frequency are you monitoring Atmospheric and Geology/Hydrogeology?	We have committed to prepare EMP(s) and BMPs following approval of the new landfill and prior to construction. These will include mitigation and monitoring measures for groundwater and air. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>8. Monitoring and Commitments for the Undertaking</i> Page 8-4 – Biology – how does all of this monitoring get reported?	We have committed to developing and implementing a Biology BMP after EA approval for the new landfill and prior to construction, which will include a process for the reporting of monitoring results. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>8. Monitoring and Commitments for the Undertaking</i> Table 8.2 – to manage dust, add sweeping of off-site roads as required.	We have committed to developing and implementing a Combustion Haul Route BMP after EA approval for the new landfill and prior to construction, which will include mitigation and monitoring requirements. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Ensure appropriate City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa	Section 8.1.7 - Surface Water Monitoring:	We have committed to consult with	Ensure appropriate

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Environment Committee – Document 3 - City of Ottawa Staff	This section does not mention full suite of monitoring that is discussed in Detailed Impact Assessment.	<p>stakeholders, such as the City, in the development of a Surface Water BMP Plan, including surface water monitoring measures.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	City technical staff are provided sufficient time to review and comment on the BMP's.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p>Section 9.9 - Land Use Approvals:</p> <p>Includes a definitive statement that no site plan approval is required. Of significance, is that the consultants indicate in the Impact Assessment that the landfill expansion is not subject to Site Plan Control Approval. We have sought a legal opinion that indicates that <u>the City does have the authority to require site plan control approval.</u></p> <p>a. There is an <u>existing site plan control agreement</u> applicable to the current Carp landfill site, therefore any new development, including the acquisition of other lands, such as those of the former Laurysen Kitchen, and the development of a number of buildings on the site, must be shown by way of an <u>amendment to the current site plan.</u></p> <p>b. Proposed are at least 7 buildings, the sizes of which are not known. However, the list of facilities' listed as part of the expanded operation of the Carp landfill include what the City and the MOE refer to as waste processing and transfer facilities' (WP&TF putrescible and WP&TF non-putrescible). These buildings will <u>require Site Plan Control Approval but are also required to obtain Certificates of Approval from the MOE separate from the C of A approval being sought for the landfill itself.</u> The Land Use Detailed Impact Assessment and the EA do not speak to the numerous C of A's that will be required. Those</p>	<p>We understand that while the City's legal opinion is that the City has the authority to require a Site Plan Control Approval, we maintain that this approval is not required given that there is an existing site plan control approval applicable to the current site.</p> <p>We concur that ECAs are required for the new landfill, material recycling facility (MRF), and construction and demolition (C&D) material recycling facility.</p>	<p>Unsatisfactory - In the City's opinion, the existing site plan must be revised and approval sought, as detailed in our original comments noted herein in column 2.</p> <p><i>The Planning Act, 1990</i> provides that the municipality has the authority, where the Official Plan includes a policy authorizing the use of Site Plan Control, and where there is a Site Plan Control By-law in effect, to require Site Plan Control Approval; and where an existing Plan affects the property, or the original portion of the property, the municipality has the authority to require approval of a revised Site Plan indicating all new lands acquired, and location and size of</p>

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	<p>facilities requiring Certificates of Approval include:</p> <ul style="list-style-type: none"> i. A material recycling facility (WP&TF non-putrescible); and ii. A construction and demolition material recycling facility (WP&TF non-putrescible). 		<p>all buildings, amongst other matters specified in <i>The Planning Act, 1990</i>.</p>
<p>City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff</p>	<p>Amending the EA provides for a proposed EA amendment process that distinguishes between minor and major amendments that may be necessary in response to unforeseen or unanticipated changes in conditions.</p> <p>Using the example outlined in the EA of an inability to implement the Preferred Leachate Treatment Alternative of Option 1 (leachate discharge to City of Ottawa sanitary sewer) in combination with Option 4 (tree irrigation), the process proposed is that WM would categorize the change as minor or major.</p> <p>If the change is categorized as minor, which WM has in this instance indicated would be the recommendation, it is proposed that WM would then discuss the proposed change and categorization with Ministry of the Environment (MOE) Environmental Assessment and Approvals Branch (EAAB) staff. If MOE EAAB staff agreed that the proposed design change is a minor amendment, WM would then prepare an amendment review document, distribute the amendment review document to directly affected stakeholders (including the City of Ottawa) for review and comment, consider the comments received, and then implement the proposed change subject to MOE EAAB approval.</p> <p>Notwithstanding the EA's commitment to soliciting MOE EAAB concurrence on minor or major amendment categorization, and notwithstanding the EA's commitment to</p>	<p>We have committed to consult with stakeholders, such as the City and public, on minor amendments to the EA prior to their implementation.</p> <p>Further details on the proposed amendment procedure are provided in Chapter 10 of the Final EA Report.</p>	<p>Ensure appropriate City technical staff are provided sufficient time to review and comment on the amendments.</p>

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	<p>soliciting comments from directly affected stakeholders, including the City of Ottawa, on the resulting amendment review document, it is respectfully suggested that the City and other stakeholders should also be included at the outset, along with the MOE EAAB, in categorizing an amendment as minor or major. This is particularly relevant in terms of an amendment that may affect municipal infrastructure, by-laws, or property values, for example. Whereas the EA has considered major amendments as altering the design of the Preferred Undertaking significantly in terms of what would be built, where it would be built, and how it would be built, in which case a new EA process would be conducted to address the major amendment being considered, changes that are categorized as minor have the potential to introduce significant environmental effects upon the stakeholder(s) independent of WM which, in the view of the stakeholder(s), may be considered major.</p>		
<p>City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff</p>	<p>The City disagrees with the proposed self-categorization of amendments, especially in cases where proposed project changes may affect municipal infrastructure, bylaws or property values. Affected stakeholders, including City staff, should be consulted, as —minor amendments, (e.g. what, where and how project facilities are built) may result in significant environmental effects for impacted stakeholders. This consultation should take place in well in advance of any postings on the MOE's Environmental Bill of Rights Website.</p>	<p>We have committed to consult with stakeholders, such as the City and public, on minor amendments to the EA prior to their implementation.</p> <p>Further details on the proposed amendment procedure are provided in Chapter 10 of the Final EA Report.</p>	<p>Ensure appropriate City technical staff are provided sufficient time to review and comment on the amendments.</p>
<p>City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff</p>	<p><i>Appendix C – Community Commitments</i></p> <p>Page 1 – In the ToR, WM committed to developing a property value protection plan. This plan has not been developed in the EA. Please provide details of the property value protection plan.</p>	<p>We have committed to the implementation of a Property Value Protection Plan, as outlined in Appendix C of the EA. When the EA and related ECA approvals have been secured and associated conditions are known, specific properties</p>	<p>"The City continues to request that any Environmental Assessment approval be conditional upon the wording expressed</p>

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		<p>covered by the Property Value Protection Plan will be identified by municipal address and owners of said properties will be formally notified by letter. We are also prepared to discuss with the City potential approaches to addressing City concerns regarding their civil exposure as a result of the new landfill and any potential impacts to surrounding properties.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	<p>in the City's original comment."</p> <p>We require WM to provide indemnification of the City in this regard and that they (WM) are fully prepared to provide any and all compensation where applicable with no cost or responsibility attributed to the City due to the landfill expansion and its possible effects.</p>
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Appendix C – Community Commitments</i></p> <p>Appendix 2 - Who is eligible?</p>	<p>We have included the Odour Enforcement Mechanism within Appendix C of the EA and Appendix D in the ToR.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Unacceptable
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Appendix C – Community Commitments</i></p> <p>Appendix 2, page 3 Claim – the specified period needs to be defined i.e. hours.</p>	<p>We have included the Odour Enforcement Mechanism within Appendix C of the EA and Appendix D in the ToR.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Unacceptable
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Appendix C – Community Commitments</i></p> <p>Appendix 2, page 3, Claim – The terms —materially and adversely need to be defined. A detected odour is adverse.</p>	<p>We have included the Odour Enforcement Mechanism within Appendix C of the EA and Appendix D in the ToR.</p> <p>Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.</p>	Unacceptable

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City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>Appendix C – Community Commitments</i> Appendix 2, page 4 – —Payment to local causell needs to be defined – eg. \$10.00 * # hours* # of homes affected =.	We have included the Odour Enforcement Mechanism within Appendix C of the EA and Appendix D in the ToR. Further details on WM commitments are provided in Chapter 8 Table 8-2 of the Final EA Report.	Unacceptable
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>Existing Conditions Reports</i> <i>Biology</i> Section 4.1 - Aquatic Survey Results: <i>Tributary B originates in the Goulbourn Wetland and flows southeasterly through the western project envelope. Detailed habitat mapping was attempted during a site visit in early August 2011, but no water was present. There was no defined channel, although the general substrate was primarily sand/silt, with some rocks and cobbles in sections.</i> <i>Based on AECOM's investigations, it appears that Tributary B lacks habitat suitable for supporting a permanent fish community.</i> We would be hesitant to make this type of conclusion, since the region was under a Level II drought for much of August. Conditions would not reflect a typical summer season.	We respectfully submit that the number of samples taken and the diversity of conditions sampled adequately reflect the nature of these streams (i.e., 6 sample events during a range of seasonal conditions over a two-year period – 2006 and 2011) and provide support for the comment on water quality varying from poor to moderate influenced by nutrient enrichment and the presence of E. coli.	Unsatisfactory. This answer has been copied and pasted from a comment related to surface water. Please answer the question pertaining to fish habitat and the presence of drought conditions.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>Existing Conditions Reports</i> <i>Biology</i> Section 4.1 - Aquatic Survey Results: <i>It is also considered that ongoing disturbance will further impair creek function and deter fish from re-colonizing the reach, even though its hydraulic connection to wetlands is important for surface water conveyance.</i> Specifically, what type of disturbance? Is there any evidence to support this	We have not stated that this type of disturbance will result in the complete loss of the fish community, rather that it will deter fish from re-colonizing the reach.	Unsatisfactory. It is still not clear what type of disturbance is being referred to.

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	statement? Fish can be found in many agricultural drains, so this type of disturbance does not necessarily result in a complete loss of the fish community.		
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Existing Conditions Reports</i> <i>Biology</i> Section 4.1 - Aquatic Survey Results: <i>Roadside surveys of Tributary D confirmed the existing condition to be typical of an ephemeral or intermittent watercourse, as the channel contained little or no discernable flow. It is unlikely Tributary D can support a resident fish population, and its likely function is the provision of indirect fish habitat for warmwater baitfish species in downstream reaches.</i></p> <p>When was this visual survey conducted? If done during summer 2011, drought conditions may have influenced these conclusions.</p>	We respectfully submit that the number of samples taken and the diversity of conditions sampled adequately reflect the nature of these streams (i.e., 6 sample events during a range of seasonal conditions over a two-year period – 2006 and 2011) and provide support for the comment on water quality varying from poor to moderate influenced by nutrient enrichment and the presence of E. coli.	Unsatisfactory. This answer has been copied and pasted from a comment related to surface water. Please answer the question pertaining to fish habitat and the presence of drought conditions.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Existing Conditions Reports</i> <i>Biology</i> Section 4.1.2 - Stream Flow Table 2 - Discharge and Staff Gauge Readings: Why are there so many blank spaces in this table? It would have been better to have more discharge data from the wet weather influenced days (May 18, 2006, July 26, 2006, and October 24, 2006). We would recommend collecting additional discharge measurements at a variety of water levels to fill these data gaps.</p>	We respectfully submit that the number of samples taken and the diversity of conditions sampled adequately reflect the nature of these streams (i.e., 6 sample events during a range of seasonal conditions over a two-year period – 2006 and 2011) and provide support for the comment on water quality varying from poor to moderate influenced by nutrient enrichment and the presence of E. coli.	Unsatisfactory. This answer has been copied and pasted from a comment related to surface water. Please answer the question pertaining to the discharge measurements.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Existing Conditions Reports</i> <i>Biology</i> Section 5.2 Terrestrial Surveys: The report identifies on page 28 that the</p>	We conducted the assessment using MNR mapping and field observations and, while we indicated that the actual area of the significant wetland may be larger than the area that was mapped by MNR, this did not materially limit	Unacceptable – If the actual area of the significant wetland is larger than MNR maps, the MNR maps

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	actual area of the significant wetland may be larger than what was mapped by the MNR. The actual extent of the significant wetland should be determined and mapped to assist in understanding the impact of the proposed project on the wetland.	our understanding of wetland area, for the purposes of characterizing baseline conditions.	should be up-dated to reflect the current wetland boundary.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>Detailed Impact Assessment Reports - Odour</i> Draft EA Comment re: Odour: No justification provided for use of the 90th percentile for the working face odour emission rate. The 90th percentile could underestimate the potential for odour emissions at the working face. Please provide rationale for use of 90th percentile. Final EA: 90th percentile was used for the working face odour emission rate. No rationale provided.	We applied the 90 th percentile for the working face odour emission rate on the basis of professional experience and an analysis by an odour panel, as noted in Supporting Document 5-C.	Unacceptable – based on our operating experience these values are unreasonable.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>Detailed Impact Assessment Reports - Odour</i> Page 24 indicates that electronic copies of input and output modeling files are provided but does not indicate where. Please identify where these files are found.	We provided electronic copies of input and output modeling files to the MOE technical staff (odour), as requested, but these electronic files were not posted on the project website.	Unacceptable – this information should have been provided on the project website.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<i>Detailed Impact Assessment Reports – Landfill Gas</i> 1.7.2 – For the intermediate operation scenario (year 2018) landfill gas (LFG) collection efficiency has been assumed to be 85% for Stages 1 through 7. LFG collection efficiencies of 85% are stated in various sections of the Baseline Conditions reports for the final cover over the existing waste mound utilizing a partial geomembrane, 600 mm of clay and 15 cm of top soil. Please describe the interim cover used over Stages 1-7 and how a collection efficiency of 85% was determined for this cover. 85% collection efficiency for landfill gas in landfill cells with interim cover and 50%	We assumed the LFG collection efficiency to be 85% based upon our experience at the Carp Road landfill between the years 2004 and 2010 when overall LFG collection efficiency increased from 23% to 85% as a result of the progressive increase in the portion of the existing landfill with final cover in place and increase in the total number of LFG extraction wells installed in the landfill mound. We assumed 85% collection efficiency for Stages 1-7 based on the presence of an in-place LFG collection system and an interim cover layer of 0.30 m of soil.	Unsatisfactory - During the time LFG collection efficiency increased incoming tonnages shrunk to 0 and final cover placement rose to 100% making 85% collection efficiency a possibility. 85% collection efficiency is extremely optimistic in the expanded landfill operation until final cover is in place.

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	collection efficiency for operating cells seems very optimistic. The EA does not provide sufficient justification for use of optimistic collection efficiencies.		
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Detailed Impact Assessment Reports – Landfill Gas</i></p> <p>Please explain how landfill gas generation estimates are affected by improved waste acceptance documentation as stated on page 20 Section 3.2.2 last paragraph.</p>	We have assumed that enhanced knowledge of wastes being received at the new landfill will improve estimates of potential LFG generation.	Unacceptable – given our experience gas generation is extremely variable and field measurements provide the most reliable generation estimates.
City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff	<p><i>Waste Diversion</i></p> <p>The City supports waste diversion away from landfill. Significant improvements will need to be made to the ICI and C&D waste diversion rate to achieve the Province's goal of 60%. The City is requesting that the province set established waste diversion targets for ICI and C&D waste diversion for the service area of the landfill and that the total allowable annual tonnage accepted at the Carp Landfill, if approved, decrease at the same percentage rate from the first year annual tonnage of 400,000 tonnes. Contaminated soils that are landfilled must be counted towards the site's annual capacity, even if they are used as daily, interim or final cover.</p>	<p>We have proposed a new landfill footprint of 6.5 million cubic meters to provide residual waste disposal capacity needed after an assumed 2% average annual increase of the diversion rate in the IC&I sector over the projected life of the new landfill. The residual waste to be disposed of at the new landfill would be material remaining after the projected diversion within the IC&I sector.</p> <p>We have projected an approximate annual tonnage of 400,000 tonnes of solid waste to be disposed of at the new landfill. An additional 15% of daily and interim cover material will be required using the proposed ratio of 6:1 based on our operating experience. Therefore, the total volume of waste and daily and interim cover material for the new landfill will be approximately 6.5 million cubic metres. Additional airspace will be required for the final cover material used to close the new landfill.</p> <p>Further details on waste diversion and service area are provided in Chapter</p>	<p>1. What is the waste density of the cover soil used in the ratio determination?</p> <p>2. Based on the Ottawa landfills 2002-2005 operations reports the actual volumetric ratio of waste to cover (assuming cover has a density of 2t/m³) is 4:1.</p> <p>The Ministry should limit the volume of cover used at the Ottawa landfill on an annual basis utilizing an agreed upon waste and cover density and the proposed 6:1 ratio.</p>

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		<p>3 of the Final EA Report.</p> <p>Further details on waste volume and cover material are provided in Chapter 6 of the Final EA Report.</p>	
<p>City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff</p>	<p><i>Site Life</i></p> <p>The City requests that the overall approved capacity of the site should be reduced from the requested 6.5M m³ to 5M m³ to reflect WM's commitment to waste diversion.</p>	<p>We proposed a new landfill of 6.5 million m³ based upon receipt of approximately 400,000 tonnes of solid waste per year, over a period of approximately 10 years. This volume includes solid waste and daily and interim cover material.</p> <p>We have proposed the WCEC as an integrated waste management facility that will provide diversion and disposal services. We have assumed an average annual increase in diversion within the IC&I sector of 2% in the projection of the need for capacity for the new landfill.</p> <p>Further details on the rationale for the undertaking are provided in Chapter 3 of the Final EA Report.</p>	<p>Unacceptable</p>
<p>City of Ottawa Environment Committee – Document 3 - City of Ottawa Staff</p>	<p><i>Final Expansion</i></p> <p>The City is requesting a guarantee from WM and the province that this be the last time that WM be allowed to request an expansion of the Carp Landfill Site.</p>	<p>We have proposed a new landfill footprint of 6.5 million cubic metres based upon historic operations and future business opportunities over a 10 year planning horizon given future uncertainty associated with the factors that may affect volume of disposal capacity required, but we did not exclude the future residual waste disposal needs for residential and IC&I sectors in the City of Ottawa and Good Neighbour Zone (GNZ). We have not precluded an ongoing need for disposal capacity for residual waste for the residential and IC&I sectors in the City of Ottawa and GNZ beyond a 10 year planning horizon.</p> <p>Further details on the rationale for the</p>	<p>Unacceptable</p>

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		undertaking are provided in Chapter 3 of the Final EA Report.	