



**Brooks Road  
Environmental**



## **Brooks Road Landfill Site Vertical Capacity Expansion**

Environmental Assessment Annual Compliance Report  
February 14, 2022 – February 14, 2023

**Brooks Road Landfill Site  
160 Brooks Road  
Haldimand County, Ontario**

February 2023

REF. NO. 018235 (112)

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# 1. Introduction

## 1.1 Purpose and Background

In accordance with Condition 5 of the Minister of the Environment, Conservation and Parks' (Minister's) Notice of Approval to Proceed with the Undertaking, this report describes the results of the Brooks Road Landfill Site Vertical Capacity Expansion Environmental Assessment (Brooks Road Landfill EA) Compliance Monitoring Program (CMP) for February 14, 2022, to February 14, 2023.

The Minister approved the Brooks Road Landfill EA that proposed to increase the capacity of the landfill on February 14, 2019. The Minister's Notice of Approval (Approval) to proceed with the Undertaking issued under Section 9 of the *Environmental Assessment Act*, dictates the conditions of the Approval of the Undertaking that must be adhered to by Brooks Road Environmental (BRE). In particular, the following conditions relating to compliance monitoring and reporting were specified by the Minister in his approval to proceed:

### 4. Compliance Monitoring Program

- 4.1 *The Proponent shall prepare and submit to the Director for approval and for the public record, an Environmental Assessment compliance monitoring program.*
- 4.2 *The compliance monitoring program shall be submitted within one year from the Date of Approval, or 60 days before the commencement of Construction, whichever is earlier, or by another date agreed upon by the Director.*
- 4.3 *The compliance monitoring program shall include a description of how the Proponent will:*
  - a. *monitor implementation of the Undertaking in accordance with the Environmental Assessment with respect to mitigation measures, public consultation, and additional studies and work to be carried out;*
  - b. *monitor compliance with the conditions in this Notice of Approval; and,*
  - c. *monitor compliance with all commitments made in the Environmental Assessment and the subsequent review of and approval process for the Environmental Assessment with respect to mitigation measures, public consultation, and additional studies and work to be carried out.*
- 4.4 *The compliance monitoring program must contain an implementation schedule for monitoring activities to be completed.*
- 4.5 *The Director may require the Proponent to amend the compliance monitoring program at any time. Should an amendment be required, the Director will notify the Proponent in writing of the required amendment and the date by which the Proponent must complete and submit the amendment to the Director.*
- 4.6 *The Proponent shall submit the amended compliance monitoring program to the Director within the time period specified by the Director.*

4.7 *The Proponent shall implement the compliance monitoring program and any amendments to it.*

## **5. Compliance Reporting**

5.1 *The Proponent shall prepare an annual compliance report outlining the results of the compliance monitoring program (Condition 4 above) and place the document on the public record.*

5.2 *The first compliance report shall be submitted to the Director for review and for the public record no later than one year following the Date of Approval. Each subsequent annual compliance report shall be submitted on the date that is the anniversary of the Date of Approval thereafter. Each report shall cover the previous year to the date of report submission.*

5.3 *The Proponent shall submit annual compliance reports until all conditions are satisfied.*

5.4 *Once all conditions in this Notice of Approval have been satisfied, the Proponent shall notify the Director in writing that the final annual compliance report is being submitted, and that all conditions in this Notice of Approval have been satisfied. The Ministry will confirm whether all conditions have been satisfied and the Director will state this in writing to the Proponent.*

5.5 *The Proponent shall retain either on the Site or in another location approved by the Director, copies of the annual compliance reports for each reporting year and any associated documentation of compliance monitoring activities.*

5.6 *The Proponent shall make the compliance reports and associated documentation available to the Director or a designate in a timely manner when requested to do so by the Ministry.*

In accordance with Condition 4, the CMP was approved by the Ministry of the Environment, Conservation and Parks (MECP) on June 22, 2020. The EA CMP outlined the following components to be monitored and managed:

- EA Commitments
- Mitigation and Monitoring Commitments
- *Environmental Assessment Act* (EA Act) Approval Conditions
- Environmental Approvals and Permits

## **1.2 Overview of the Annual Compliance Report**

In accordance with Conditions 5.1 through 5.6 of the Minister's Approval, Brooks Road Environmental is to report on the results of this EA CMP. The Annual Compliance Reports (ACRs) are to cover the activities of the previous year to the date of report submission. In accordance with Condition 5.2, this ACR covers the period of February 14, 2022, to February 14, 2023 (2023 ACR).

Consistent with the framework presented in the EA CMP, the 2023 ACR comprises the following sections:

- **Section 2** lists the mitigation and monitoring commitments made by Brooks Road during the EA that were documented in **Section 7** of the Brooks Road EA Report (EA Report), as well as the Minister's *EA Act* Approval conditions that need to be satisfied.

- **Section 3** lists the additional approvals, authorizations and permits acquired beyond *EA Act* approval as documented in **Section 8** of the EA Report.

Sections 2 and 3 of the ACR include compliance monitoring tables. The following column headings common to all tables are included for compliance tracking purposes:

- **Evidence of Compliance** – describes how each provision will be monitored for compliance/fulfillment during implementation of the Undertaking
- **Implementation Schedule** – outlines the estimated project stage when each provision will be fulfilled
- **Status/Remarks** – allows for an update to be provided on where the fulfillment of the provision stands versus its planned implementation schedule
- **Compliance Achieved? (Yes or In Progress)** – allows for a “yes” or “in progress” response to be provided so compliance fulfillment can be easily tracked

The **Evidence of Compliance** and **Implementation Schedule** are included as they appear in the EA CMP. The **Status/Remarks** and **Compliance Achieved** columns contain information specific to this ACR.

## 2. **EA Mitigation and Monitoring Commitments and EA Act Approval Conditions**

**Table 2.1** includes the following:

- Commitments made during the EA that need to be satisfied during implementation of the Undertaking as documented in Section 7.3 of the EA Report. These commitments include mitigation measures identified in Section 5.0 of the EA Report for addressing potential adverse environmental effects associated with implementing the Undertaking.
- *EA Act* approval conditions that need to be satisfied during implementation of the Undertaking included in the Minister’s Notice of Approval. Where an *EA Act* approval condition relates to an EA commitment, both are included in the same row for compliance tracking purposes.
- Monitoring programs included in Section 7.1 of the EA Report to ensure that predicted net negative effects are not exceeded, unexpected negative effects are addressed, and predicted benefits are realized.

**Table 2.1** indicates the status of fulfilling each provision between February 14, 2022, and February 14, 2023. The following is a summary of activities took place during this reporting period:

- Continuation of complaint tracking, as reported in Appendix A.



- Continuation of groundwater, surface water, and the current leachate quality monitoring programs per Section 7.7 of the updated D&O Report, which are reported in the Annual Monitoring Report (AMR) forming part of the amended ECA issued by the MECP on October 1, 2021.

The commitments/conditions included in Table 2.1 that remain as “In Progress” this reporting year primarily reflect ongoing monitoring activities. As a result, these commitments/conditions are expected to remain “In Progress” throughout operations.

**Table 2.1 EA Mitigation and Monitoring Commitments and Approval Conditions**

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
<b>General</b>	Not Applicable (N/A)	N/A	N/A	N/A	<p><b>Condition #2 - General Requirements</b></p> <p>2.1. The Proponent shall comply with the provisions in the Environmental Assessment, which are hereby incorporated into this Notice of Approval by reference, except as provided in the conditions of this Notice of Approval and as provided in any other approval or permit that may be issued for this Site.</p> <p>2.2. The Proponent shall fulfill all commitments made in the Environmental Assessment.</p> <p>2.3. The conditions of the Notice of Approval do not prevent more restrictive conditions being imposed under other statutes.</p>	Confirm the Conditions of Approval have been fulfilled and commitments made have been undertaken. Prior to March 27, 2020, and during operation, closure, and post-closure of the Site.	Prior to March 27, 2020, and during operation, closure, and post-closure of the Site.	<p>The following conditions of approval have been fulfilled as documented in this Annual Compliance Report:</p> <ul style="list-style-type: none"> <li>- Condition #4: Compliance Monitoring Program</li> <li>- Condition #8: Air Quality and Odour</li> <li>- Condition #9: Groundwater and Surface Water Protection</li> <li>- Condition #12: Wetland and Species at Risk Protection</li> </ul> <p>The following conditions of approval are ongoing:</p> <ul style="list-style-type: none"> <li>- Condition #2: General Requirements</li> <li>- Condition #3: Public Record</li> <li>- Condition #6: Compliant Protocol</li> </ul> <p>Commitments made in the Environmental Assessment that have been fulfilled are noted in in this Annual Report as "Completed". Commitments that are ongoing are noted as "In Progress."</p>	In Progress
<b>Best Management Practice Plans</b>	5.0 & 7.2	Prepare Best Management Practice (BMP) Plans following approval of the undertaking by the Minister of the Environment and Climate Change and prior to vertical expansion of the Site. The BMP Plans will include a description of proposed mitigation measures, monitoring requirements, and commitments. The BMP Plans will ensure these mitigation measures, monitoring requirements, and commitments are implemented during construction, operation, closure, and post-closure of the Site.	N/A	N/A	N/A	Confirm BMP Plan(s) have been prepared prior to implementation of the Undertaking.	Preparation and implementation of BMP Plans in 2020. Specific time commitments for each BMP Plan are outlined below in the table.	BMP Plans were included within the D&O Report submitted as part of the ECA, which was approved on October 1, 2021.	Compliance Achieved
<b>Consultation</b>	6.0	Continue to facilitate the ongoing function of the PLC as per Conditions 86 and 87 of ECA No. A110302 for the existing Brooks Road Landfill Site.	N/A	N/A	N/A	Confirm that the PLC continues during construction and operation of the Undertaking.	Conduct PLC meetings three times a year. They are anticipated to be held at the beginning of March, June, and November of each year. The exact dates will be confirmed during the last meeting of each year, for the following year.	Three PLC meetings were conducted between February 14, 2022, and February 14, 2023, in the months of March, June, and November. In March 2022, the PLC Committee chose not to meet in-person and a PLC Committee electronic update was completed. The other two meetings were conducted in-person. These meetings included a presentation and discussion on	In Progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
		Ongoing consultation and engagement, as requested by the public, agencies, County, PLC, and First Nations/ Aboriginal communities associated with ECA amendment(s) and other regulatory approvals required at the Site.	N/A	N/A	<p><b>Condition # 7 – Consultation with Indigenous Communities</b></p> <p>7.1 The Proponent shall prepare, in consultation with Indigenous Communities, an Indigenous consultation plan that sets forth:</p> <p>a. How, during the planning, design, Construction, operation, and closure of the Undertaking, the Proponent will consult with Indigenous Communities and provide them with opportunities to be involved in environmental monitoring activities</p> <p>b. How the Proponent will notify Indigenous Communities, using a notification protocol, if archaeological resources or Indigenous remains are encountered during the planning, design, construction, operation, and closure of the Undertaking</p> <p>c. How the Proponent will issue notices and updates to Indigenous communities on keysteps in the planning, design, construction, operation, and closure of the Undertaking</p> <p>2. 90 days before the start of Construction or by such other date as may be agreed to in writing by the Director, the Proponent shall submit the Indigenous consultation plan to the Director for approval with an outline of how the Proponent consulted on it as per Condition 7.1 above.</p> <p>3. Once the Director is satisfied with the Indigenous consultation plan, the Proponent shall implement the Indigenous consultation plan during the planning, design, construction, operation, and closure of the Undertaking.</p>	<p>Confirm that consultation is undertaken as per ECA application requirements.</p> <p>Confirm that an Indigenous consultation plan is prepared and submitted to the Director.</p>	<p>Submit final Indigenous consultation plan to Director by May 31, 2020, and carry out consultation with Indigenous Communities during operation and closure of the landfill as per the Indigenous consultation plan.</p>	<p>operations at the Site. A link to these presentations and meeting minutes can be found <a href="#">here - PUBLIC LIAISON COMMITTEE   brooksroadenvironmental.com</a></p> <p>Brooks Road Landfill and the PLC committee will continue to review and consider hosting in-person meetings alongside electronic updates.</p> <p>The Indigenous Consultation Plan was submitted to MECP on July 22, 2020, and approved on August 19, 2020.</p>	<p>Compliance Achieved</p>
<b>Air Quality &amp; Odours</b>	5.0	Fugitive Dust Best Management Plan will be implemented to reduce roadway emission by a minimum of 90 percent.	N/A	N/A	<p><b>Condition #8 - Air Quality and Odour</b></p> <p>8.1 When applying for an Environmental Compliance Approval (ECA), the Proponent shall provide, to</p>	<p>Confirm that a Fugitive Dust Best Management Plan is implemented during operation</p>	<p>Prior to March 27, 2020. Final version of Odour Management Plan</p>	<p>The ECA amendment was approved by the MECP on October 1, 2021. The ECA application was completed to the satisfaction of the Ministry. The ECA amendment application included the Odour</p>	<p>Compliance Achieved</p>

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring	Status/Remarks (as of February 14, 2023)			Compliance Achieved? (Completed in Progress)	
		This may include watering and sweeping of roadways and temporary monitoring of particulate matter to confirm that the mitigation measures implemented are effectiveCorrect .			<p>the satisfaction of the Ministry, the following information as part of its application:</p> <ol style="list-style-type: none"> <li>An emissions summary and dispersion modelling report that includes landfill gas</li> <li>An odour assessment and modelling report for the expanded landfill Site</li> <li>A dust management plan for the Site which shall include fugitive dust emissions from allsources at the Site</li> <li>An odour management plan detailing themeasures for addressing the potential odours that may emanate from the Site</li> </ol>	<p>Confirm that a SOP forodour has been prepared.</p> <p>Confirm that an Odour Management Plan has been prepared and includes daily odour monitoring.</p> <p>Confirm that the ECA application is completed to the satisfaction of the Ministry.</p>	<p>to be submitted byJune 25, 2020.</p> <p>Implement plans and protocols as specified throughout the life of the Site.</p>	<p>control measures (revised to address comments received by the MECP), and the Dust Management Plan (see Section 6.9 of the D&amp;O Report).</p> <p>The Landfill Operator/Supervisor performs daily dust monitoring through visual inspections of climatic conditions that contribute to fugitive dust. When a build-up of dust is observed, the Landfill Operator/Supervisor uses wetting and covering as mitigation measures.</p> <p>The entire Site is inspected daily to monitor odour generation, which is documented within a daily log. This includes inspection of the odour source and control measures to ensure effectiveness.</p>	
					<p><b>Condition # 6 - Complaint Protocol</b></p> <p>6.1. The Proponent shall prepare and implement a complaint protocol that sets out provisions for dealing with and responding to inquiries and complaints during all stages of the Undertaking. The complaint protocol shall include a procedure for notifying the Ministry's Hamilton District Office of the complaints received.</p> <p>6.2. The Proponent shall submit the complaint protocol to the Director for approval and for the public record within one year from the Date of Approval, or 60 days before the start of construction, whichever is earlier, or by andotherdate agreed upon by the Director.</p> <p>6.3. The Director may require the Proponent to amend the complaint protocol at any time. Should an amendment be required, the Director shall notify the proponent in writing of the amendment required and when the amendment must be completed.</p> <p>6.4. The Proponent shall submit the amended complaint protocol to the Director within the timeperiod specified by the Director.</p> <p>6.5. The Proponent shall implement the complaint protocol and any amendments to it.</p> <p>The Proponent shall provide a summary on the complaints received and how they were addressed as part of the annual compliance reporting (Condition 5) and post the summary on the website as part of the public record.</p>	<p>Confirm that a Complaint Protocol is prepared.</p>	<p>Implement plans and protocols as specified throughout the life of the Site.</p>	<p>A Compliant Protocol was prepared, submitted on September 30, 2020, approved by the MECP on October 21, 2020, and implemented thereafter.</p> <p>The Complaint Protocol will continue to be completed throughout the life or the Site. A summary of annual complaints is provided in Appendix A.</p>	<p><b>Compliance Achieved</b></p> <p>In Progress</p>

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
		Development of standard operating procedure (SOP) for odour to include odour mitigation measures that will be implemented to ensure that odour complaints are investigated and that the condition that resulted in the odour complaint is mitigated.	N/A	N/A				The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. The Odour control measures was originally submitted on June 25, 2020, and updated in the most recent D&O Report, which forms part of the October 1, 2021, ECA Amendment.	Compliance Achieved
		<p>Implementation of an Odour Best Management Plan including the continuation and modification of the following odour control measures:</p> <ul style="list-style-type: none"> <li>– Daily odour monitoring</li> <li>– Minimizing exposed waste through the application of cover material</li> <li>– Limit exposed areas of the leachate collection system</li> <li>– When not in use, ensure blind flanges are placed on leachate collection system cleanouts and sump risers</li> <li>– Application of odour control granules and liquid spray</li> <li>– Community outreach to identify any impacts at neighbouring residences</li> </ul> <p>Maintain the leachate collection system under negative pressure may also be included as an Odour BMP.</p>	7.1.1	<p><b>Daily Odour Monitoring</b></p> <p>Monitoring of odour on Site is conducted and documented daily by Brooks Road Environmental staff. This includes observation of weather conditions, wind speed and direction, site operating conditions, odour type and smell (if present), and documentation of any odour complaints received.</p>				The entire Site is inspected daily to monitor odour generation. This includes inspection of the odour source and control measures to ensure effectiveness. A record of this monitoring is documented within the Annual Monitoring Report as per Section 7.7 of the updated D&O Report.	In Progress
		N/A	7.1.1	<p><b>Landfill Gas Monitoring</b></p> <p>The monitoring network currently comprises six nested gas probes installed in three on-Site locations (two gas probes per nest). An</p>	Condition #8 - Air Quality and Odour 8.2 The Proponent shall prepare and implement a landfill gas mitigation plan that specifies measures for monitoring and reducing landfill gas emissions for the construction, operation, closure and post-closure phases of the expanded landfill Site. The Proponent shall report on changes in landfill gas production in its	Confirm that a landfill gas mitigation plan has been prepared and implemented.	Implement plans and protocols as specified throughout the life of the Site.	<p>The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. The Landfill gas mitigation was included as part of the Odour control measures, originally submitted on June 25, 2020, and updated in the most recent D&amp;O Report, which forms part of the October 1, 2021 ECA Amendment.</p> <p>The Site has implemented a monthly landfill gas monitoring program based on the requirements of ECA No. A110302. Landfill</p>	In progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
				additional pair of gas probes will be installed adjacent to the leachate treatment facility following commissioning. Landfill gas monitoring activities are to be conducted monthly from December 1 to April 30 and on a quarterly basis from May through November.	annual compliance report (Condition 5 above).			gas generation modeling for the Site estimated peak annual methane emissions. Based on the low estimate of landfill gas production that has been estimated for the Site, gas collection and control systems will not be employed.  Landfill gas monitoring is conducted monthly from December 1 to April 30, and quarterly from May 1 to November 30, at 12 gas probes. The results of the 2022 monitoring will be released on March 31, 2023 and reported as part of the 2023 Annual Monitoring Report.	
<b>Noise</b>	5.0 & 7.0	Implementation of a Noise Best Management Plan to minimize noise impacts from the Site. BMPs may include barriers and/or berms at the landfill perimeter, as required, administrative controls that limit on-Site landfilling activities, and routine monitoring of landfill equipment to ensure it is performing within acceptable noise limits.	7.1.2	<b>Noise Monitoring</b> Landfill equipment will be routinely monitored to ensure that they are performing within acceptable noise limits. As all residential dwellings are below the 55 dBA noise limit, no additional annual monitoring is recommended	N/A	Ensure a Noise BMP is prepared and includes a plan for noise monitoring	Prepare Noise BMP in 2020 and conduct routine noise monitoring in accordance with the final Noise BMP throughout the operation of the Site.	The Noise BMP was initially prepared and included within the D&O Report, approved by the MECP on March 27, 2020. The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. Noise control measures are included in Section 6.9 of the updated D&O Report, which forms part of the October 1, 2021, ECA Amendment.	Compliance Achieved
<b>Geology &amp; Hydrogeology</b>	7.0	Continuation of the existing groundwater monitoring program, consisting of both hydraulic monitoring and water quality monitoring at a network of 29 monitoring wells.	7.1.3	<b>Groundwater Monitoring</b> The existing groundwater monitoring program will continue and comprises both hydraulic monitoring and water quality monitoring of a network of 29 monitoring wells (21 on Site and 8 off Site wells).  Hydraulic and groundwater quality monitoring are scheduled to take place in	N/A	Confirm that existing groundwater program is continued.	Conduct hydraulic and groundwater quality monitoring May, July, and November, each year during operation of the Landfill. Continue to conduct groundwater monitoring during the post-closure period.	Groundwater monitoring is conducted bi-annually in May and November. Monitoring activities include: – Measurement of static groundwater – Hydraulics – Water and bedrock quality sampling  Results are reported in the Annual Monitoring Report as per Section 7.7 of the updated D&O Report.	In Progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
				May, July, and November. Groundwater levels will continue to be measured at all monitoring locations, when possible, at the time of sample collection.					
	7.0	Continuation of the existing leachate quality monitoring program.	7.1.3	<p><b>Leachate Monitoring</b> The existing leachate monitoring program at the Site includes leachate quality monitoring. Leachate quality samples are currently collected directly from the leachate collection system. Leachate hydraulic monitoring will commence upon commissioning of the new leachate treatment facility. As part of Site development and progressive closure, leachate monitoring wells will be installed within the waste mound so that further leachate characterization and hydraulic monitoring can be accomplished. Leachate quality monitoring will be conducted in accordance with</p>	<p><b>Condition #9 - Groundwater and SurfaceWater Protection</b> 9.1 When applying for anECA, the Proponent shall provide, to the satisfaction of the Ministry, the following information as part of its application:</p> <ul style="list-style-type: none"> <li>a. Information documenting the performance of the existing leachate management system at the Site</li> <li>b. A description in the design and operations report on how the Proponent will manage the rate of fill and potential leachate generation</li> <li>c. A leachate management plan for the vertical landfill expansion.</li> </ul>	<p>Confirm that existing leachate quality monitoring program is continued.</p> <p>Confirm that the ECA application is completed to the satisfaction of the Ministry.</p>	<p>Provide required information during ECA application, continue leachate quality monitoring program as specified in the ECA and report annually on program as a part of Annual Compliance Report, which is to be submitted on February 14 each year.</p>	<p>Leachate monitoring is conducted monthly. Results are reported in the Annual Monitoring Report of the updated D&amp;O Report.</p> <p>The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. Leachate control measures are included in the updated D&amp;O Report, which forms part of the October 1, 2021, ECA Amendment.</p>	In Progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
				the ECA. Leachate samples are currently collected from the leachate collection system on an annual basis in July and are analyzed for inorganic chemistry parameters, metals, PAHs, and VOCs					
<b>Surface Water Resources</b>	7.0	Continuation of the existing surface water monitoring program, consisting of water quality monitoring and surface water flow measurements.	7.1.4	<p><b>Surface water monitoring</b></p> <p>Surface water monitoring will continue to include both water quality monitoring and surface water flow measurements. The surface water monitoring network currently comprises seven surface water monitoring stations (two on Site and five off Site), as shown in Figure 4.14. These stations will be maintained.</p> <p>Water quality monitoring and surface water flow measurements at the current seven surface water monitoring stations will take place on a quarterly basis in March, May, August, and November. The measurements are also correlated with rainfall events.</p>	N/A	Confirm that the existing surface water monitoring program is discontinued.	Continuation of the surface water monitoring program on a quarterly basis each year in March, May, August, and November, during operation of the landfill. Continue to conduct surface water monitoring during the post-closure period.	<p>The Surface water Monitoring Program is included in Section 7.2 of the D&amp;O Report, which was approved by the MECP on March 27, 2020.</p> <p>Surface water monitoring takes place on a quarterly basis.</p> <p>Results are reported in the Annual Monitoring Report of the updated D&amp;O Report.</p>	In Progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
				As such, the John C. Munro Hamilton International Airport in Mount Hope, ON (Hamilton Airport), located approximately 24 km to the north, is often used to schedule surface water monitoring events.					
	7.0	An eighth surface water monitoring station (SW-2) will be added following the construction of the on-Site stormwater management pond. SW-2 will be located on-Site at the outlet from the on-Site stormwater management pond.	7.1.4	An eighth monitoring station (SW 2) will be added following the construction of the on-Site stormwater management pond.	N/A	Confirm that SW-2 is added following construction	2019	SW-2 has been added to the Site and it will continue to be monitored on a quarterly basis as part of the water quality monitoring and surface water flow measurements at all water stations.	Compliance Achieved
<b>Stormwater Management</b>	5.0	Implementation of a stormwater management infrastructure operation, maintenance, and inspection plan, including regular sediment level monitoring (recommended annually under stabilized post closure conditions) to estimate the portion of the permanent pool that is filled by sediment, sediment removal activities (once accumulation reaches approximately 1/3 of the available permanent pool volume), annual inspection of sediment accumulation within the vegetated swales, and maintenance activities if conveyance capacities are reduced significantly and/or if bare soil areas are present.	N/A	N/A	N/A	Confirm that a stormwater management infrastructure operation, maintenance, and inspection plan is implemented.	Implementation of plan prior to March 27, 2020, and inspection of infrastructure in accordance with the plan.	A Stormwater Management Plan for the Site was updated in 2013. The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. Stormwater management is included in Section 4.6 of the updated D&O Report, which forms part of the October 1, 2021, ECA Amendment.	Compliance Achieved
<b>Terrestrial &amp; Aquatic Environment</b>	5.0	Implementation of a Terrestrial & Aquatic Environment Best Management Plan. BMPs for continued operation of the landfill may include: – Notification of Site operators and delivery	7.1.6	1. Routine inspections of the integrity of the perimeter silt fence. Inspections should be conducted at	<b>Condition # 12 – Wetland and Species at Risk Protection</b> 12.1. The Proponent shall install a permanent silt fence that extends the entire perimeter of the Site property to exclude wildlife from accessing the Site. This exclusion fence shall be routinely monitored and maintained in	Confirm a Terrestrial and Aquatic Environment BMP is prepared. Confirm silt fencing is installed. Confirm staff are trained in the identification of SAR.	Confirm BMP is submitted, and silt fencing is installed in 2020 and confirm staff are trained in the identification of Species at Risk at the beginning of each year during the life of the Site.	The Terrestrial and Aquatic Environment BMP was submitted to the MECP on September 30, 2020, and approved on October 21, 2020.  Section 5.1 of the D&O Report, approved by the MECP on March 27, 2020, details the design and installation of the silt and wildlife	In Progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
		<p>contractors of the presence of reptiles and amphibians in the surrounding areas. This includes visual identification tools for species at risk (SAR) common to the area.</p> <ul style="list-style-type: none"> <li>- Any wildlife incidentally encountered during Site operation activities will not be knowingly harmed and will be allowed to move away from the area on its own, if possible</li> <li>- If an animal encountered during Site operation activities does not move from the area, or is injured, the Site Supervisor will be notified.</li> <li>- If the animal is a known or suspected SAR, the Site Supervisor will contact MNRF Species at Risk biologists for advice</li> <li>- Silt fence is recommended to be added to all perimeter Site fencing as an enhanced effort to minimize human-wildlife interactions on Site.</li> </ul> <p>Erosion and sediment controls shall be maintained until all disturbed areas of the Site, including the pond and swales, have fully stabilized and vegetated areas have achieved 70 percent of the native background density of growth. The condition of all swales, culverts, vegetation, infiltration basin outlet, and outflow channels leading to the Brooks Road drainage ditch and off-Site will be noted at regular intervals.</p>		<p>a regular frequency (e.g., minimum quarterly monitoring). Inspection reports should be prepared and maintained on-Site. Incidental observations of silt fence disrepair should be reported immediately to the Site Operations Manager and addressed in a timely fashion.</p> <p>2. Routinely evaluate the extent of the heavy-duty silt fence and 5 m north Subject Land vegetated buffer. Extend the silt fence and vegetated buffer east along the north Subject Land boundary when disturbance of the temporarily vegetated portion of the stockpile is scheduled.</p> <p>3. Routine inspections of the integrity and effectiveness of the Sites chain link fence for any</p>	<p>good working condition throughout the construction, operation, and closure of the landfill.</p> <p>12.2. The Proponent shall train staff in the identification of Blanding's Turtle and other Species at Risk known to be within the general vicinity of the Site. Training shall include Species at Risk awareness and the appropriate steps to take upon encountering a SAR. If a Species at Risk is found on the Site property, all activities that could potentially harm the animal shall cease and a Ministry of Natural Resources and Forestry biologist shall be contacted.</p> <p>The Proponent shall develop and implement a wetland monitoring program to demonstrate that there are no impairments to water quality, quantity, vegetation, or wildlife in the Cayuga Swamp Wetland Complex located adjacent to the Site because of the Undertaking. The Proponent shall prepare wetland monitoring reports outlining the results of the wetland monitoring program. The Proponent shall provide copies of the wetland monitoring reports to the Ministry of Natural Resources and Forestry and submit them to the Ministry as part of its annual compliance report (Condition 5 above).</p>		<p>exclusion fence, which was installed onsite between September 27 to December 1, 2021.</p> <p>A GHD ecologist performed regular inspections during installation to ensure that the fence was installed as per Condition 12.1 of MECP requirements and to limit impacts on local wildlife. No damages in the fence were reported. The fence will be maintained by Brooks Road Environmental and monitored at a minimum of each quarter by GHD staff in 2022 and 2023.</p> <p>GHD prepared a Site-specific Species at Risk identification guide for Brooks Road Environmental Site staff and visitor use to address Condition 12.2 of the Approval.</p> <p>This guide provides a visual and descriptive representation of Species at Risk species potentially occurring within the area.</p>		

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
				<p>evidence of wildlife attempting to enter the Site. Any disrepair should be reported immediately to the Site Operations Manager and addressed in a timely fashion.</p> <p>4. Monitoring and Report any observations of Species at Risk that may enter the site. Photos of Species at Risk in the area of the site will be kept within the office at the site. Photos will be taken of any Species at Risk on site by landfill staff and documented in the annual monitoring report. Follow-up calls to MNRF will be undertaken should Species at Risk be encountered. Monitoring of the wetland to the north of the site will occur for the duration of receipt of waste at the landfill. Monitoring will review</p>					

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
				effectiveness of mitigation measures put in place to ensure no effects to wetland (i.e., silt fence is in working order, utilize monitoring data from groundwater wells to demonstrate no offsite impacts beyond the perimeter of the site).					
	7.0	Annual monitoring of wetland for duration of landfill operation	N/A	N/A	N/A	Confirm a wetland monitoring program is prepared and reported on annually.	Submit wetland monitoring program by end of June 2020, and submit wetland monitoring reports annually on February 14 as a part of compliance report.	<p>A Wetland Monitoring Program is included in the Terrestrial and Aquatic Environment BMP as part of the ECA amendment on October 1, 2021. Section 7.2 of the D&amp;O Report details additional wetland monitoring locations.</p> <p>The results of the 2021 wetland monitoring program were as follows:</p> <ul style="list-style-type: none"> <li>- The wetland characteristics are consistent with pre-Approval conditions.</li> <li>- No SARs were observed as part of GHD's wildlife surveys</li> <li>- Quarterly monitoring of silt fence will continue to be conducted</li> </ul> <p>Wetland monitoring will occur every three years..</p>	In Progress
<b>Archaeology &amp; Cultural Heritages</b>	5.0	The <i>Cemeteries Act</i> , R.S.O. 1990 c. C.4 and the <i>Funeral, Burial and Cremation Services Act</i> , 2002, S.O. 2002, c.33 (when proclaimed in force) requires that any person discovering human remains must notify the police or coroner and the Registrar of Cemeteries at the Ministry of Consumer Services.	N/A	N/A	N/A	Confirm that if human remains are found that the police or coroner are contacted.	Upon occurrence	No archaeological resources or human remains have been uncovered.	In Progress
<b>Land Use</b>	5.0 & 7.0	Monitor land use applications, plans, and/or policies, including Official Plan, Zoning By-Law,	7.1.5	Monitor any changes in plans and by-laws on a regular basis to	N/A	Confirm if any action was taken to respond to land use applications or changes to land use plans and policies.	Immediate action if required.	No relevant changes in plans or by-laws have been identified.	In Progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
		Community Development Plans, plans of subdivision, site plans, and OMB decisions, for the following: <ul style="list-style-type: none"> <li>- To determine any potential effects on the Undertaking</li> <li>- To provide comments to Haldimand County, as necessary, in relation to the above; and</li> </ul> To take further action, as required, in relation to the above, including appeals.		ensure that any related to waste disposal operations are not overlooked.					
	5.0	Nuisance related effects to off-Site recreational resources within 500 m of landfill footprint and the two residential properties within 500 m of the landfill footprint will be mitigated through the implementation of Site D&O BMPs included in the Amended Site D&O Report for the Amended ECA	N/A	N/A	N/A	Confirm inclusion of Site D&O BMPs in the Amended Site D&O Report in the Amended ECA.	Prior to March 27, 2020	The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. The Site D&O BMP was included in the most recent D&O Report, which forms part of the October 1, 2021, ECA Amendment.	Compliance Achieved
<b>Agriculture Soils &amp; Mining</b>	5.0	Nuisance related effects to surrounding agricultural operations will be mitigated through the implementation of Site D&O BMPs included in the Amended Site D&O Report for the Amended ECA (see <b>Site Design &amp; Operations</b> , below).	N/A	N/A	N/A	Confirm inclusion of Site D&O BMPs in the Amended Site D&O Report in the Amended ECA.	Prior to March 27, 2020	The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. The Site D&O BMP was updated in the most recent D&O Report, which forms part of the October 1, 2021 ECA Amendment.	Compliance Achieved
<b>Site Design &amp; Operations</b>	5.0	The Amended Site D&O Report for the Amended ECA will include BMPs to be implemented by Brooks Road Environmental to maximize operational flexibility and may include the following: <ul style="list-style-type: none"> <li>- Tarping vehicles transporting waste to and around the Site, as required, to prevent litter from blowing out of the vehicle</li> </ul>	N/A	N/A	N/A	Confirm the elements are included in the Amended Site D&O Report.	Prior to March 27, 2020	The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. The elements were included in the most recent D&O Report, which forms part of the October 1, 2021 ECA Amendment.	Compliance Achieved

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
		<ul style="list-style-type: none"> <li>- Applying daily cover to exposed waste to confine light weight material</li> <li>- Ensuring that cover material is readily available to allow the working face to be fully covered at the end of each operating day</li> <li>- Minimizing the area of exposed waste at the working face.</li> <li>- Adjusting the location of the working face, as required, to provide shelter from prevailing winds, if possible</li> <li>- Using portable litter fences around the working face to capture litter</li> <li>- Collecting litter on an as-needed basis, both from the Site and, if required, from the adjacent lands and roadway</li> <li>- Operating on-Site equipment in a manner such that noise impacts are minimized, wherever possible</li> <li>- Ensuring that all landfill construction equipment associated with the development, operation, or closure of the Site comply with the noise levels outlined in applicable MOECC guidelines and technical standards</li> <li>- Vegetating the berm on the western Site boundary and/or on-Site plantings, as required, to attenuate visual and noise impacts</li> <li>- Compacting waste immediately after placement and spreading</li> </ul>							

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
		<ul style="list-style-type: none"> <li>- Vector and vermin are controlled, as required</li> <li>- Maintaining the comprehensive monitoring and maintenance program to address all aspects of landfill operation, including waste inspection, and monitoring of landfill odour</li> <li>- Site haul roads are constructed to minimize mud track out and dust mitigation measures are employed on an as-needed basis.</li> </ul>							
<b>Socio-Economics</b>	5.0	Views of the Site from the west and southwest will be minimized by planting trees or shrubs on top of the berm along the western property boundary and/or introducing additional on-Site plantings, as required.	N/A	N/A	N/A	Confirm that plantings and/or berms are implemented, as necessary.	Annually during the spring and fall (as required).	Screening berms were installed along Brooks Road (west of the Site) and the vacant lands to the north, east & south of the Site. Details regarding the existing and future measures to limit the visual impacts of the Site are included in Section 4.2.2 of the updated D&O Report, included as part of the most recent ECA Amendment approved by MECP on October 1, 2021.	Compliance Achieved
	5.0	Nuisance related effects to the 11 residences within the Local Study Area will be mitigated through the implementation of Site D&O BMPs included in the Amended Site D&O Report for the Amended ECA (see <b>Site Design &amp; Operations</b> , above).	N/A	N/A	N/A	Confirm inclusion of Site Design and Operation BMPs in the Amended Site D&O Report in the Amended ECA.	Prior to March 27, 2020	The most recent ECA amendment for the Site was approved by the MECP on October 1, 2021. The Site D&O BMP was updated in the most recent D&O Report, which forms part of the October 1, 2021 ECA Amendment.	Compliance Achieved
<b>Contingency Plans</b>	7.4	Prepare Contingency Plans following approval of the undertaking by the Minister of the Environment and Climate Change and prior to vertical expansion of the Site. The Contingency Plans will include a description of proposed contingency measures, monitoring requirements, and commitments. The Contingency Plans will ensure these contingency measures, monitoring requirements, and	N.A.	N.A.	N.A.	Confirm that Contingency Plans are prepared, as necessary.	Prior to March 27, 2020	Contingency plans are included in Section 8 of the most recent D&O Report included as part of the most recent ECA Amendment approved by the MECP on October 1, 2021.	Compliance Achieved

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
		commitments are implemented, if required, during construction, operation, closure, and post-closure of the Site.							
<b>Public Records</b>	N/A	N/A	N/A	N/A	<p><b>Condition # 3 – Public Record</b></p> <p>3. Public Record 3.1. Where a document is required for the public record, the Proponent shall post the document on the Proponent website and provide one hardcopy and one electronic copy of the document to the Director.</p> <p>3.2. The EA Reference Number 13004 and EA File Number 03-08-02 shall be quoted on all documents submitted to the Ministry pursuant to this Notice of Approval.</p> <p>For every document submitted to the Ministry, the Proponent shall clearly identify which condition of approval the document is meant to fulfill.</p>	Confirm that documents have been placed on the public record, as required.	Upon submission of documents for the public record	To date, the following documents have been provided to the Director for the public record: <ul style="list-style-type: none"> <li>– Complaint Protocol</li> <li>– Compliance Monitoring Program</li> <li>– Annual Compliance Reports</li> </ul>	In Progress
<b>Compliance Monitoring</b>	N/A	N/A	N/A	N/A	<p><b>Condition # 4 – Compliance Monitoring Program</b></p> <p>4.1. The Proponent shall prepare and submit to the Director for approval and for the public record, an Environmental Assessment compliance monitoring program</p> <p>4.2. The compliance monitoring program shall be submitted within one year from the Date of Approval, or 60 days before the commencement of Construction, whichever is earlier, or by another date agreed upon by the Director</p> <p>4.3. The compliance monitoring program shall include a description of how the Proponent will:</p> <p>a. Monitor implementation of the Undertaking in accordance with the EA with respect to mitigation measures, public consultation, and additional studies and work to be carried out.</p> <p>b. Monitor compliance with the conditions in this Notice of Approval</p> <p>c. Monitor compliance with all commitments made in the EA and the subsequent review of and approval process for the EA with respect to mitigation measures, public consultation, and additional studies and work to be carried out.</p> <p>4.4. The compliance monitoring program must contain an implementation schedule for</p>	Confirm Compliance Monitoring Program have been prepared and submitted to the Director.	Submission of revised Compliance Monitoring Program by May 31, 2020.	The Compliance Monitoring Program was submitted on February 6, 2020, and approved by the MECP on June 22, 2020.	Compliance Achieved

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring				Status/Remarks (as of February 14, 2023)	Compliance Achieved? (Completed in Progress)
					<p>monitoring activities to be completed</p> <p>4.5 The Director may require the Proponent to amend the compliance monitoring program at any time. Should an amendment be required, the Director will notify the Proponent in writing of the required amendment and the date by which the Proponent must complete and submit the amendment to the Director.</p> <p>4.6. The Proponent shall submit the amended compliance monitoring program to the Director within the time specified by the Director.</p> <p>The Proponent shall implement the compliance monitoring program and any amendments to it.</p>				
	N/A	N/A	N/A	N/A	<p><b>Condition # 5 – Compliance Reporting</b></p> <p>5.1. The Proponent shall prepare an annual compliance report outlining the results of the compliance monitoring program (Condition 4 above) and place the document on the public record.</p> <p>5.2. The first compliance report shall be submitted to the Director for review and for the public record no later than one year following the Date of Approval. Each subsequent annual compliance report shall be submitted on the date that is the anniversary of the Date of Approval thereafter. Each report shall cover the previous year to the date of report submission.</p> <p>5.3. The Proponent shall submit annual compliance reports until all conditions are satisfied.</p> <p>5.4. Once all conditions in this Notice of Approval have been satisfied, the Proponent shall notify the Director in writing that the final annual compliance report is being submitted, and that all conditions in this Notice of Approval have been satisfied. The Ministry will confirm whether all conditions have been satisfied and the Director will state this in writing to the Proponent.</p> <p>5.5. The Proponent shall retain either on the Site or in another location approved by the Director, copies of the annual compliance reports for each reporting year and any associated documentation of</p>	Confirm Annual Compliance Reports are submitted annually until all conditions are satisfied.	Annually each year on February 14 until all conditions are satisfied.	<p>The following Annual Compliance Reports have been submitted:</p> <ul style="list-style-type: none"> <li>– February 14, 2019, to February 14, 2020, reporting period: Submitted to the Director on February 14, 2020.</li> <li>– February 14, 2020, to February 14, 2021, reporting period: Submitted to the Director on February 14, 2021</li> <li>– February 14, 2021, to February 14, 2022, reporting period: Submitted to the Director on February 14, 2022. Comments were received on May 12, 2021, and responded to on October 8, 2021. As per GHD's response, additional detail has been added to Table 2.1 of 2022 Annual Compliance Report concerning the timing and status for fulfilling EA commitments and conditions of approval.</li> </ul>	In Progress

Category	EA Commitments		Proposed Monitoring			EA Act Approval Conditions	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Compliance Reporting
	EA Reports	EA Commitments	EA Report Section	Monitoring	Status/Remarks (as of February 14, 2023)			Compliance Achieved? (Completed in Progress)	
					compliance monitoring activities. The Proponent shall make the compliance reports and associated documentation available to the Director or a designate in a timely manner when requested to do so by the Ministry.				
<b>Extreme Weather Events</b>	N/A	N/A	N/A	N/A	<b>Condition # 10 – Extreme Weather Events</b> 10.1. When applying for an ECA, the Proponent shall provide to the satisfaction of the Ministry as part of its application, an assessment of landfill vulnerability to side slope failure due to extreme weather events. The Proponent shall complete a slope stability modelling exercise to determine the appropriate safety factor to be applied to the design of the vertically expanded landfill and identify appropriate mitigation and contingency measures to prevent side slope failure.	Confirm that the ECA application is completed to the satisfaction of the Ministry.	April 29, 2019	A technical memorandum to address extreme weather events is included in Appendix B of the most recent D&O Report, which forms part of the most recent ECA Amendment, approved by the MECP on October 1, 2021.	Compliance Achieved
<b>Waste Diversion</b>	N/A	N/A	N/A	N/A	<b>Condition # 11 – Waste Diversion</b> 11.1. The Proponent shall develop and implement a waste diversion protocol, which shall contain information on awareness programs for waste generators and haulers, and on-site waste segregation protocols to maximize the diversion of industrial, commercial, and institutional waste, including organics. The Proponent shall submit the waste diversion protocol to the Ministry in its application for an ECA and report industrial, commercial, and institutional waste diversion amounts in its annual compliance report (Condition 5 above).	Confirm a waste diversion protocol is prepared.	Prior to March 27, 2020	A Waste Diversion Protocol was submitted in a letter to MECP Approvals dated September 10, 2019, and updated in Section 5.5 of the updated D&O Report, which forms part of the most recent ECA Amendment, approved by the MECP on October 1, 2021.	Compliance Achieved
<b>Duration of Approvals</b>	N/A	N/A	N/A	N/A	<b>Condition # 13 – Duration of Approval</b> 13.1. If Construction has not commenced within 2 years of the Date of Approval, the Proponent shall conduct a review of the Environmental Assessment and submit that review to the Director. The review shall look at the potential environmental effects and mitigation measures, and identify any changes to these components. If Construction has not commenced within 5 years of the Date of Approval, this Notice of Approval shall expire.	Confirm construction (expansion of the Landfill) has commenced within two years of the Date of Approval.	January 15, 2021	Expansion of Landfill commenced on March 27, 2020.	Compliance Achieved

### **3. Additional Environmental Approvals and Permits**

In addition to EA approval, further environmental approvals will be required in support of the proposed undertaking. This section outlines the other approvals that will be required for the proposed undertaking and indicates the status of obtaining each approval/permit between February 14, 2022, and February 14, 2023.

**Table 3.1 Approvals and Permits Compliance Monitoring**

Applicable Approval/Permit	Evidence of Compliance	Implementation Schedule (Estimate Timelines and Dates)	Status/Remarks (as of date of Annual Compliance Report)	Compliance Achieved? (Yes/In Progress)
<b>Environmental Compliance Approval - Ministry of the Environment, Conservation and Parks</b>				
An application to amend the existing ECA for the Site will need to be submitted to the MECP for approval. Changes to the design and operations of the landfill required because of the Preferred Alternative will be documented in an update to the existing D&O Report for the Site.	Confirm the ECA is approved by MECP.	March 27, 2020	The application to amend the existing ECA for the Site was approved by the MECP on March 27, 2020.	Completed
<b>Noise</b>				
The updated D&O and amended ECA will include any additional mobile noise sources such as crushing equipment for construction and demolition processing. Other landfill operations equipment and potential on Site noise sources, including intermittent, will be addressed under the ECA for the Site overall.	Confirm the updated D&O includes any additional mobile noise sources, as necessary	April 29 2019	No additional mobile noise sources are anticipated	Completed
<b>Surface Water Resources</b>				
The updated D&O and amended ECA will include details of any changes required to the approved on-Site stormwater management system.	Confirm the updated D&O includes changes to the approved on-site stormwater management system, as appropriate.	April 29 2019	The updated D&O Report was approved by the MECP on March 27, 2020.	Completed

## Appendix A

Date of Complaint	Time of Complaint Received	Complaint Duration	By	Mitigation Action
3/3/2022	8:34 AM	Between 7:15 - 7:45 AM	BRE	Although odour was not detected during the off-site inspection, slight odour was detected at the leachate treatment plant as a tanker was being loaded with leachate for off-site disposal. As a measure of precaution, action was taken to minimize odour generation when tankers are being loaded with leachate. These measures included reducing the amount of time that hatches or lids are open to prevent odour from escaping during the loading process. Additionally, the potential odour sources were discussed with staff working in the area to increase awareness of potential off-site odour impacts.
4/7/2022	7:53 AM	Between 7:25 - 7:45 AM	BRE	Although odour was not detected during the either of the off-Site inspections, as a measure of precaution, action was taken to minimize odour generation when tankers are being loaded with leachate. These measures included reducing the amount of time that hatches or lids are open to prevent odour escaping during the loading process. Additionally, the potential odour sources were discussed with staff working in the area to increase awareness of potential off-site odour impacts.
10/24/2022	9:42 AM	8:00 AM and ongoing	BRE	An on-site odour inspection was conducted throughout the Site and odour was detected. Source of the odour was identified to be from a liquid fertilizer activity on a farmland. Brooks Road continues with regular odour mitigation measures.