



**Brooks Road
Environmental**



Brooks Road Landfill Site Vertical Capacity Expansion

Complaint Protocol

Brooks Road Landfill

160 Brooks Road Haldimand County, Ontario

**September 2020 (Revised)
REF. NO. 018235 (94)**

GHD

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1. Introduction

1.1 Purpose and Background

This document describes the Complaint Protocol prepared in accordance with Condition No. 6 of the Minister of Environment, Conservation and Parks' (Minister) Notice of Approval to Proceed with the Undertaking. The Minister approved the EA for the Brooks Road Landfill Site Vertical Capacity Expansion on February 14, 2019.

The Notice of Approval, issued under Section 9 of the *Environmental Assessment Act*, gives Brooks Road the approval to proceed with the proposed vertical expansion of the waste disposal capacity of the Brooks Road Landfill Site, subject to the conditions set out in it. With this in mind, the Minister's Notice of Approval specified the following compliance monitoring and reporting related conditions:

6. Complaints Protocol

- 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 for the complaints received.*
- 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 another date agreed upon by the director.*
- 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.*
- 6.4 *The Proponent shall submit the amended complaint protocol to the Director within the time period specified by the Director.*
- 6.5 *The Proponent shall implement the complaint protocol and any amendments to it.*
- 6.6 *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.*

In addition, the following conditions are included in the Amended Environmental Compliance Approval No. A110302:

9. Complaints Response Procedure

- (1) If at any time the Owner receives complaints regarding the operation of the Site, the Owner shall respond to these complaints according to the following procedure:
 - a. The Owner shall record and number each complaint, either electronically or in a log book, and shall include the following information: the nature of the complaint, the

name, address and the telephone number of the complainant if the complainant will provide this information and the time and date of the complaint;

- b. The Owner, upon notification of the complaint, shall initiate appropriate steps to determine possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint. When possible, the Owner will forward a written reply to the complainant; and
- c. The Owner shall complete and retain on-site a report written within one (1) week of the complaint date, listing the actions taken to resolve the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

11. Public Liaison Committee (PLC)

- (1) The Owner/Operator shall maintain and participate in a landfill PLC, which shall function in accordance with the Terms of Reference for the PLC, as amended from time to time. Any amendment to the Terms of Reference must be approved by the District Manager. The PLC shall serve as a forum for dissemination, consultation, review and exchange of information regarding the operation of the landfill Site, including environmental monitoring, maintenance, complaint resolution, and new approvals or amendments to existing approvals related to the operation of this landfill Site.

With these EA and ECA conditions in mind, Section 2 provides details on the complaints procedure that is in place at the Site, including complaint documentation and issues resolutions mechanisms, and Section 3 outlines the complaint reporting process.

2. Complaints Procedure

The purpose of this procedure is to establish a clear process for residents to voice any concerns they may have with respect to operating issues at the Site. This Public Complaint Procedure is an update to the currently approved procedure dated December 2004. The following steps outline the various avenues the public may follow to lodge any complaint resulting from operations at the Site:

1. During regular hours of operation, 7:00 am to 5:00 pm (Monday to Friday) any complaints should be made directly to the Site by calling 1-888-40-BRENV (27368) or 416-389-8876. The Site Supervisor on duty at the time will ensure the issue is dealt with immediately. Alternatively, complainants may choose to visit the Site in person and speak directly to the Site Supervisor during the above noted regular hours, provided the Site is not closed between these hours. Upon entering the Site, the complainant shall check-in at the scale house.
2. Outside regular hours of operation, a voice message can be left at 1-888-40-BRENV (27368) or 416-389-8876. In cases of emergency, residents should call 911 so that appropriate action(s) can be taken

3. When making a complaint, residents should be prepared to provide the following information
 - i) Date and time
 - ii) Resident's name
 - iii) Resident's address
 - iv) Location relative to the Site
 - v) Contact information (email address is preferred for follow-up purposes)
 - vi) Nature of the complaint
 - vii) Weather conditions at the time of the complaint

Weather conditions will be documented to determine if the weather was a contributing factor to the complaint (e.g., litter impacts can be associated with periods of high winds, or odour impacts can be associated with overcast periods with little wind).

In the event of receipt of a complaint related to odour, BRE personnel will travel to the location of the odour complaint (or the nearest accessible location) to assess for the presence of odour. BRE personnel will then trace back toward the Site and complete a perimeter inspection for the presence of odour. This inspection will be in addition to any daily inspections already carried out by BRE. The purpose will be to determine if odour is coming from the Site and to determine the potential on-Site source. If odour is confirmed to originate from the Site, per Condition 3(29) of ECA No. A110302, BRE will initiate mitigation measures in accordance with the Odour Management Plan. Mitigation measures to be implemented are specific to the source of on-Site odour.

When a complaint is received, BRE will notify the MECP as soon as practicable. Complaint forms will be completed and logged by Brooks Road Environmental (BRE) when a complaint has been received. This will be undertaken for all complaints, whether written or verbal. The complaint form template is provided in Appendix A. Any complaint investigations activities recorded on the complaint form will be sent to the MECP within seven (7) days of completion.

These forms will provide a record to be kept on file, along with copies of any correspondence to, or discussion with, the complainant. Upon request, members of the Public Liaison Committee (PLC) will receive a copy of each complaint.

A response will be made to the complainant by the end of the next business day (from the day that BRE receives the complaint) confirming the receipt of the complaint, the nature of the complaint, and results of any follow-up. If the complaint cannot be resolved within a reasonable time period, the complainant will be notified of the action to be taken.

Appropriate signage will be placed at the Site entrance/exit indicating the overview of the Public Complaint Procedure, including the phone number for registering any complaint. Phone numbers for the Ministry of the Environment, Conservation and Parks (MECP) Hamilton District Office and Haldimand County By-law enforcement will also be included on the signs.

MECP Hamilton District Office:
Taylor Buck, 365-336-7491

Haldimand County By-law Enforcement
Caledonia Office, 905-318-5932

3. Complaint Reporting

All complaints will be reviewed on an annual basis and summarized in the Annual Monitoring Report. BRE will be responsible to ensure that the following is undertaken and documented:

- Circulating all complaints to members of the PLC, MECP Hamilton District Office and Haldimand County prior to each PLC meeting, and keeping a public record at the Owner offices. Copies of complaint forms will be available at the Site office.
- Reviewing with the PLC and County all complaints received and Owner's response/ action at each PLC meeting.
- Provide a summary of complaints received and how they were addressed as part of the Annual Compliance Report and posting that summary on the website, as per EA Condition of Approval 6.6



Appendix A Complaint Form

Brooks Road Environmental

160 Brooks Road, Cayuga NOA 1E0

Tel: 416-389-8876

COMMUNITY REPORT 2020 -

Complaint Details	
How was the complaint received	
Date / Time of Complaint Received	
Resident Name	
Address	
Phone Number	
Nature of Complaint	
Date / Time of Complaint Occurred	
Quality of the odour	
Intensity	
Frequency	
Duration	
Reported weather conditions	
Odour affect on the complainant	
Investigation	
Did the Complaint occur during business hours	
Was Odour detected by Staff at the time of complaint	
Weather condition (Environment Canada - Hamilton A)	
What odour control measures were being utilized at time of complaint	
Other	
Corrective Meassures	
Measures used to mitigate the complaint	
Agencies notified	
Community Report Details	
Completed by	
Name	
Title	
Date	