

Comments on Brooks Road Landfill expansion ESR

Table 1 Comments from MECP on the ESR

Date of Comment	Method of Communication	Topic	Comment from MECP	How the Comment was Considered
02/06/2024	Email	Report Inconsistencies	Several sections of the draft ESR are displaying error messages. This should be corrected in the final ESR. Examples: Sections: 6. Summary of Comments Received, 3.1.4 Description of Surface Water Existing Conditions, 4.2.3 Surface Water Net Environmental Effects, etc.	Comment addressed
		Screening Criteria Checklist	<p>The Screening Criteria Checklists in Section 2.2, Appendix C Section 2, and Appendix B contain inconsistencies:</p> <ul style="list-style-type: none"> Row 1.3 in Section 2.2 checks “No” and states that the sedimentation effects caused by the project are “not anticipated to be significant”; Row 1.3 in Appendix B checks “Yes” and states that the project “may cause sedimentation”. In Appendix B, Row 2.1 is omitted, and Row 2.2 is duplicated. Row 2.5 in Section 2.2 and in Appendix C Section 2 check “Yes” and state that the project “may require the use of hazard lands”; Row 2.5 in Appendix B checks “No” and states that the project “would not require the use of hazard lands”. Row 4.1 in Section 2.2 checks “Yes” and states that “numerous” Species At Risk exist within the project site; Row. 4.1 in Appendix B checks “No” and states that “no” Species At Risk exist within the project site. Row 4.4 in Section 2.2 states that a Wildlife Activity Area is “present within the Study Areas”; Row 4.4 in Appendix B states that “none have been identified as being present on-site”. Row 4.7 in Section 2.2 checks “No” and states that the land changes cause by the project are “unlikely to cause an increase in bird hazards”; Row 4.7 in Appendix B checks “Yes” and states that land changes “may cause an increase in bird hazards”. 	<p>Criteria 1.3 is addressed in Appendix A – Surface Water Assessment Report and matches with Section 2.2 of ESR.</p> <p>The text in the “additional information” column is updated to match the ESR.</p> <p>Comment addressed</p> <p>Appendix B of the Open House Summary Report contains the Display Boards presented during Open House 1 in June 2022. The Screening Criteria Checklist in Appendix B was prepared at the start of this project and has been updated based on the feedback received at the Open House and subsequent consultation with interest holders, along with information obtained through investigation and technical studies.</p>

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			<ul style="list-style-type: none"> Row 6.1 in Section 2.2 and Appendix C Section 2 check “No” and state that the project “will not cause negative effects” to character; Row 6.1 in Appendix B checks “Yes” and states that the project “may cause negative effects” to character. 	
			<ul style="list-style-type: none"> Row 6.3 in Section 2.2 checks “No” but states that the project “may cause negative effects” on local businesses; Row 6.3 in Appendix C Section 2 checks “No” and states that the project “would not result in negative effects” on local businesses; Row 6.3 in Appendix B checks “Yes” and states that “may cause negative effects” on local businesses. 	Updates made to “additional information” text in the ESR Section 2.2, Row 6.3 to align with Appendix C. Appendix B of the Open House Summary Report contains the Display Boards presented during Open House 1 in June 2022. The Screening Criteria Checklist in Appendix B was prepared at the start of this project and has been updated based on the feedback received at the Open House and subsequent consultation with interest holders, along with information obtained through investigation and technical studies.
			<ul style="list-style-type: none"> Row 6.9 in Section 2.2 and Appendix B state that a “private airfield used for soaring” is located near the project site; Row 6.9 in Appendix C Section 2 states that the “Cayuga East Airport” and “a private airfield used for soaring” are located near the project site. 	Text updated in the ESR to align with Appendix C. Appendix B of the Open House Summary Report contains the Display Boards presented during Open House 1 in June 2022. The Screening Criteria Checklist in Appendix B was prepared at the start of this project and has been updated based on the feedback received at the Open House and subsequent consultation with interest holders, along with information obtained through investigation and technical studies.
			<ul style="list-style-type: none"> Row 6.11 in Section 2.2 checks “No” but states that the project “may cause negative effects” on public health and safety; Row 6.11 in Appendix C Section 2 checks “No” and states that the project “would not cause any negative effects” on public health and safety; Row 6.11 in Appendix B checks “Yes” and states that the project “may cause negative effects” on public health and safety. <p>Please review and correct accordingly. If no correction is needed, please provide the reasoning of these discrepancies.</p>	
		Surface Water	<p>All the comments regarding surface water refer to the Surface Water Assessment Report in Appendix A.</p> <p>Section 3.2.1 describes the current surface water monitoring program that quarterly sampling of a comprehensive list of parameters at three off Site background locations (SW1, SW8, and SW9), two on – site locations (SW2 and SW5), and four locations downstream (SW3, SW4, SW6, and SW7). Surface water quality is assessed against the Provincial Water Quality Objectives (PWQO), and an attempt is made to correlate surface water monitoring with rainfall events using the precipitation data from John C. Munro Hamilton International Airport (HIA).</p> <p>The proposed expansion does not appear to impact the access or remove any of the current monitoring locations. As such, there is no need to relocate or establish new monitoring locations due to the expansion. The current monitoring program is sufficient to determine impacts from landfilling activities on the site.</p>	Comment noted.
			<p>The ministry previously conducted review of recent Operations and Monitoring Reports (2020, 2021, 2022) and noted that quarterly samples at various locations are often missed due to dry or stagnant water conditions at the monitoring locations. A better effort to collect surface water samples under appropriate conditions should be made, so that there is an adequate data set to determine impacts from the landfill. The HIA rainfall data is not representative of the actual rainfall that the site receives as it is too far away from the site. The HIA data is also not available in real-time making it difficult to plan sampling events that are dependent on adequate rainfall. The Grand River Conservation Authority (GRCA) operates a real-time rainfall gauge in York (York, Station 12122042) that is</p>	The suggested station will be reviewed by the team that prepares the Operations and Monitoring Reports and appropriate changes will be implemented, as required.

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			<p>approximately 8 km to the northwest of the site, as compared to HIA that is 24 km to the north. Real-time data can be accessed from the GRCA website at the hyperlink below. Using the rainfall data from the GRCA's York station will not only more accurately reflect rainfall totals experienced at the site, but also be more useful in planning surface water sampling events. Historical data can be accessed from GRCA upon request from the second hyperlink below.</p> <p>GRCA Real Time Rainfall Data Link: https://apps.grandriver.ca/waterdata/kiwischarts/rt_rainfallsummary.aspx#gsc.tab=0 GRCA Historical Data Downloads: https://data.grandriver.ca/downloads-monitoring.html</p>	
			<p>While assessing surface water quality against the PWQO is sufficient for many parameters, the owner should consider assessing surface water quality against the Canadian Water Quality Guidelines (CWQG) for the protection of aquatic life (long-term exposure) values as well. PWQO values are no longer being updated based on recent science and it is the intent of the Ministry to adopt CWQG as they are updated from time to time. In general, it is good practice to use the more recently developed of the PWQO or CQWG to assess surface water quality.</p> <p>In many cases the CWQGs are based on more recent science and toxicity data than the PWQO and are more appropriate for assessing impacts to surface water. It should be noted that some CWQG include calculations considering toxicity modifying factors or are based on the dissolved proportion of a contaminant. For example, the CWQG for zinc is based on dissolved zinc using a calculation that considers hardness and dissolved organic carbon (DOC). To assess surface water quality against the CWQG the sampling program may need to be modified to include toxicity modifying factors (hardness, DOC, pH, etc.) and sampling requirements (i.e., field filtering for dissolved metals).</p> <p>That being said, a number of contaminants are naturally elevated in the surface water features near the site as demonstrated by background water quality data. For these contaminants, it is still appropriate to compare concentrations at potentially impacted locations to the historical range of background concentrations.</p> <p>Section 4.1 includes a summary table of proposed capacity expansion design (Table 4.1) on page 10 and 11.</p>	<p>The Owner will consider this information and review with the team that prepares the Operations and Monitoring Report, and appropriate changes will be implemented, as required.</p>
			<p>The existing stormwater pond capacity is sufficient for the proposed expansion based on the existing stormwater management plan. Further to a review of the stormwater management plan prepared by Conestoga Rovers and Associates dated September 2013, it is confirmed that the existing pond has sufficient capacity for the proposed expansion. As such, no changes to the existing stormwater pond are required.</p>	<p>Comment noted.</p>
			<p>The proposed expansion requires that the stormwater drainage ditch along the northern expansion is to shift by approximately 30 meters. Additionally, the perimeter access road along the northern expansion area is to be shifted by 29 meters. Currently, the northern extent of the access road and stormwater ditch are</p>	<p>Construction period erosion and sediment control measures will be part of detailed design. Changes have been made to the Mitigation Measures section of the Surface Water Assessment Report as well as the ESR in response to the comments.</p>

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			<p>adjacent to the former railway that ran along the northern edge of the site. As such, it is possible that there are historical contaminants associated with railway ballast may be disturbed by the excavation of the existing berm and construction of new access road and drainage ditch.</p> <ul style="list-style-type: none"> • Will the quality of the soils/materials to be removed be assessed, and what mitigation strategies will be in place to prevent the mobilization of these contaminants into the stormwater management system or of-Site drainage? • Additionally, it is recommended that an erosion and sediment control plan be followed during construction to prevent the downstream transport of excess sediments. • If significant dewatering (e.g. greater than 50,000 liters/Day) is required to construct the roadway and ditch, then a Permit to Take Water (PTTW) may be required or if the water taking meets the requirements of the Environmental Activity Sector Registry (EASR) then the activity would need to be registered. Further information on the PTTW program and water taking EASR can be found at the following links: <ul style="list-style-type: none"> ○ PTTW Link: https://www.ontario.ca/page/permits-take-water ○ EASR Link: https://www.ontario.ca/page/water-taking-user-guide-environmental-activity-and-sector-registry#section-2 <p>Sections 4.3.1 and 4.3.2 discuss potential effects on surface water and proposed mitigative measures, respectively. These include potential surface water quality impacts and surface water quantity impacts.</p>	
			<p>Potential water quality impacts include minor erosion/soil loss from the landfill cap due to steeper slopes. This may lead to increases total suspended solids (TSS) and associated contaminant (e.g. metals entrained in the soil) runoff into the stormwater management system. The existing stormwater management ditches and pond should be sufficient to mitigate these impacts. However, increased TSS loads to the pond may result sedimentation within the pond that could lead to reduced capacity or increased maintenance (i.e. cleanout, dredging of pond sediment). Reductions in pond capacity and inspection and maintenance of the pond should be addressed through the stormwater ECA. Additionally, the final cover should be revegetated with native plants to increase soil stability and reduce erosion/soil loss from the final cover.</p>	<p>The operations and maintenance requirements of the pond include checking for sediment accumulation and requiring cleanout when maintenance threshold is reached.</p>
			<p>The proposed expansion is not anticipated to result in a significant increase in peak flow rates or runoff volumes. The hydrological modeling that was conducted based on the proposed expansion scenario included analysis of storm events from the 2 year up to 100 year, 24 hour SCS Type 2 distribution. This is consistent with the guidance provided in the MECPs Stormwater Planning and Design Manual, 2003. It is expected that the expanded stormwater drainage ditch and SWM pond have sufficient capacity for any minor increases in peak flow or volume that may occur as a result of the expansion. As such, no modifications to the existing stormwater management works are required, other than the proposed modifications to the stormwater drainage ditches to capture stormwater from the capped landfill areas.</p>	<p>Comment noted</p>

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			<p>Section 5.2 summarized previous monitoring results. In addition, the ministry recently reviewed the 2020, 2021 and 2022 operations and monitoring reports for the site (see attached). The ministry provides the following comments from that review.</p> <p>In General, water quality on Site and downstream are similar within the historical ranges of the background locations with some exceedances of the relevant PWQO values for select metals and general chemistry parameters noted. However, there are some notable exceptions, as follows:</p> <ul style="list-style-type: none"> • SW5 – Boron concentrations were elevated above historical background concentrations and have shown a slight increasing trend since 2017. • SW3 – while SW3 was not sampled in 2022 due to dry conditions, the historical data record indicates occasional concentrations of select metals (Iron in 2019) and PAHs greater than the background locations. GHD has suggested that elevated metals and PAH concentrations are not associated with leachate but may be related to historical slag piles and road ballast along the site entrance. SW2 has also experienced similar elevated concentrations in the past, however it appears to be locally isolated as results from further downstream at SW4 are within the range of historical background concentrations. • SW6 – The 2021 data showed some detections of PAH above background concentrations, which GHD suggested may be relate to historical slag piles rather than landfill leachate. GHD also noted an increasing trend in boron concentrations since 2012. <p>While GHD indicated that surface water quality is not impacted by landfill leachate, there are some concerning trends including increasing boron concentrations at SW5 and SW6, and occasional detections of PAH above background concentrations at SW2, SW3 and SW6.</p> <ul style="list-style-type: none"> • The increasing boron concentrations may be related to landfill leachate as boron has been selected as a leachate indicator for the site. This trend should be monitored closely as it could be an indication of a failure in the leachate collection system or leachate seeps. • While the PAH exceedances may not be related to landfill leachate, it is recommended to maintain the current monitoring program to determine if any additional actions may be required. This could include delineation of the impacts from the historical slag piles and road ballast that have been suggested by GHD as a potential source of observed metals and PAH exceedances. 	<p>The trend for Boron and PAHs will be reviewed and actions may be proposed, if warranted. This could include potential delineation of historical activities that have the potential to cause impacts.</p>
			<p>I have the following comments as relates to surface water content in the referenced reports and the requirements of the ECAs. While reviewing each individual report (2020, 2021, 2022) I noted the conclusions, recommendations and concerns from a surface water perspective were similar. As such, the comments noted below, and section references correlate to the latest report (2022 Operation and Monitoring Report)</p> <p>1) Section 4.1.3 describes the Surface Water Monitoring program that is conducted at nine locations (two on Site, and seven off Site). Surface water samples are collected on a quarterly basis during flowing conditions that correlate with rainfall events where possible. GHD notes that they use precipitation data from John C. Munro Hamilton International Airport (HIA) in Mount Hope, Ontario that is 24 kilometers to the north. In the 2020, 2021, and 2022 reports it is noted</p>	<p>The suggested station will be reviewed by the team that prepares the Operations and Monitoring Reports and appropriate changes will be implemented, as required.</p>

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			<p>that conditions are often dry during the sampling events resulting in missed opportunities to assess off-Site impacts.</p> <p>Comment 1: The HIA precipitation data is not representative of the actual rainfall that the Site receives as it is too far away from the Site. The HIA data is also not available in real-time making it difficult to plan sampling events that are dependent on adequate rainfall. The Grand River Conservation Authority (GRCA) operates a real-time precipitation gauge in York (York, Station 12122042) that is approximately 8 km to the northwest of the Site. Real-time data can be accessed from the GRCA website at the hyperlink below. Using the precipitation data from the GRCA's York station will not only more accurately reflect precipitation totals experienced at the site, but also be more useful in planning surface water sampling events. Historical data can be accessed from GRCA upon request from the second hyperlink below. GRCA Real Time Precipitation Data Link https://apps.grandriver.ca/waterdata/kiwischarts/rf_rainfallsummary.aspx#gsc.tab=0 GRCA Historical Data Downloads https://data.grandriver.ca/downloads-monitoring.html</p> <p>It is recommended that the GRCA York (station 12122042) precipitation gauge be used for planning and correlating surface water monitoring with precipitation events. Precipitation data from HIA may also be used for verification, but the GRCA York station is likely more representative. A better attempt should be made to plan sampling events following significant rainfall event (i.e., greater than 15mm over 24 hours) to ensure off Site impacts can be properly assessed.</p>	
			<p>2) Section 5.1 on page 9 includes a table with reasoning for samples that were not collected in 2022. The 2020 and 2021 reports also contain similar tables. The table notes that many samples were not collected due to dry conditions or insufficient volume.</p> <p>Comment 2: Following my recommendation noted in comment 1 may result in more samples collected at more monitoring locations by targeting sampling after rainfall events of adequate volume (i.e., greater than 15mm over 24 hours).</p>	<p>Comment noted and will be addressed during operations and monitoring.</p>
			<p>3) Section 5.5 notes that surface water quality is assessed against the Provincial Water Quality Objectives (PWQO) where available.</p> <p>Comment 3: While assessing surface water quality against the PWQO is sufficient for many parameters, the consultant (GHD) should consider assessing against the Canadian Water Quality Guidelines (CWQG) for the protection of aquatic life (long-term exposure) values as well. In many cases the CWQGs are based on more recent science and toxicity data than the PWQO and are more appropriate for assessing impacts to surface water. It should be noted that some CWQG include calculations considering toxicity modifying factors or are based on the dissolved proportion of a contaminant. For example, the CWQG for Zinc is based on dissolved zinc using a calculation that considers hardness and dissolved organic carbon (DOC). To assess surface water quality against the CWQG the sampling program may need to be modified to include toxicity modifying factors (hardness, DOC, pH, etc.) and sampling requirements (i.e., field filtering for dissolved metals).</p>	<p>The Owner will consider this information and review with the team that prepares the Operations and Monitoring Report, and appropriate changes will be implemented, as required.</p>

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			<p>4) Section 5.5 discusses surface water quality both on and off Site and the results historical results are presented in Appendix G. In General, water quality on Site and downstream are similar within the historical ranges of the background locations with some exceedances of the relevant PWQO values for select metals and general chemistry parameters noted. However, there are some notable exceptions.</p> <p>a. SW5 – Boron concentrations were elevated above historical background concentrations and have shown a slight increasing trend since 2017.</p> <p>b. SW3 – while SW3 was not sampled in 2022 due to dry conditions, the historical data record indicates occasional concentrations of select metals (Iron in 2019) and PAHs greater than the background locations. GHD has suggested that elevated metals and PAH concentrations are not associated with leachate but may be related to historical slag piles and road ballast along the site entrance. SW2 has also experienced similar elevated concentrations in the past, however it appears to be locally isolated as results from further downstream at SW4 are within the range of historical background concentrations.</p> <p>c. SW6 – The 2021 data showed some detections of PAH above background concentrations, which GHD suggested may be relate to historical slag piles rather than landfill leachate. GHD also noted an increasing trend in boron concentrations since 2012.</p> <p>Comment 4: While the results indicate that surface water quality is not impacted by landfill leachate, there are some concerning trends including increasing boron concentrations at SW5 and SW6, and occasional detections of PAH above background concentrations. The increasing boron concentrations may be related to landfill leachate as boron has been selected as a leachate indicator for the site (see section 5.2.2. of the 2022 report). This trend should be monitored closely as it could be an indication of a failure in the leachate collection system or leachate seep to surface water. While the PAH exceedances may not be related to landfill leachate, it is recommended to maintain the current monitoring program to determine if any additional actions may be required. This could include delineation of the impacts from the historical slag piles and road ballast that have been suggested by GHD as a potential source of observed metals and PAH exceedances.</p>	<p>The trend for Boron and PAHs will be reviewed and actions may be proposed, if warranted. This could include potential delineation of historical activities that have the potential to cause impacts.</p>
			<p>5) The reports discuss SWMS pond sampling in section 6.2. On occasion the samples indicated trigger level exceedances of pH (both field and lab), arsenic and boron. It is noted in the 2020 report that the trigger level for boron was increased from 0.2 mg/L to 1.5 mg/L which is consistent with the newer developed CWQG for boron. Since this change there have been no trigger exceedances for Boron. GHD noted a well that on occasion in 2021, re-sampling within 2 weeks of an exceedance was not completed, which does not conform with Condition 11 (10) of the SW ECA. Regardless of some occasional minor exceedances of the trigger levels the data indicates the SWMS Pond is functioning adequately to prevent impacts from the on-Site stormwater to the Brooks Road ditch and Norton Creek.</p>	<p>Comment noted and will be addressed during operations and monitoring.</p>

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			<p>Comment 5: The owner should ensure that re-sampling following trigger level exceedances is completed, as it was shown that was not for some events in 2021. This represents a non-compliance with Condition 11 (10) of the SW ECA.</p>	
		<p>Consultation and Engagement</p>	<p>11. Appendix J.1 Stakeholder Tracking Database should be updated with the following changes:</p> <ul style="list-style-type: none"> Charlene Anderson is no longer the Environmental Officer of the site of this project and should be removed from the stakeholder list. Instead, the current Environmental Officer, Jordan Balch's, contact information should be added to the list: Jordan.Balch@ontario.ca. Joan Del Villar Cuicas is no longer acting in the position. The word acting can be removed. Carolynn Lee is no longer the Special Project Officer for this site and should be removed from the stakeholder list. Please include Andrew Evers, Project Coordinator Unit Supervisor, Environmental Assessment and Permissions Division, Andrew.Evers@ontario.ca. 	<p>Noted and changes made accordingly.</p>
			<p>12. Please ensure all the consultation records are included in the final report (i.e., correspondence from virtual meeting with the Mississaugas of the Credit First Nation was held on July 19, 2022, and An in-person meeting with members of the Six Nations scheduled for January 12, 2024.</p>	<p>All correspondence with Indigenous Communities including the correspondence with Mississaugas of the Credit First Nation and with the Six Nations is included in Appendix I.5</p>
		<p>Notice of Completion</p>	<p>13. Please ensure that the Notice of Completion, the follow-up correspondence, and the responses from stakeholders are included in the final Environmental Screening Report.</p>	<p>Notice of Completion is included as Appendix J in the ESR. Comments received on the draft ESR from Government Review team and Public are included in Appendix I7 in the form of comment-response tables.</p>
			<p>14. It is recommended to circulate the Notice of completion to the updated Indigenous consultation contacts below, as the contacts that were used initially may no longer be available.</p> <ul style="list-style-type: none"> Six Nations (elected) Chief- Sherri-Lyn Hill sngr.chief@sixnations.ca 2498 Chiefswood Rd. P.O Box 5000, Oshweken ON N0A 1M0 519-445-2201 cc. Dawn Russell- dawnrussell@sixnations.ca (consultation) Peter Graham- LRCS@sixnations.ca HDI- info@hdi.land Haudenosaunee Confederacy c/o- HDI P.O. Box 714 Oshweken, ON N0A 1M0 Mississaugas of the Credit First Nation- Chief Clara Sault claires@mncfn.ca 2789 Mississauga Rd. Hagersville, ON N0A 1H0 905-768-1133 cc. Abby LaForme abby.laforme@mncfn.ca (consultation) Adam LaForme adam.laforme@mncfn.ca (consultation) 	<p>Comment noted</p>

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		Species at risk	15. It is the responsibility of the proponent to ensure that Species at Risk are not killed, harmed, or harassed, and that their habitat is not damaged or destroyed through the proposed activities to be carried out on the site. If the proposed activities cannot avoid impacting protected species and their habitats, then the proponent should contact SAROntario@ontario.ca and an Information Gathering Form will be required.	Comment noted. Given that the proposed expansion is within the Site boundary, no impacts to SAR species habitats are anticipated. Mitigation measures have been included in Section 4.3.2 detailing general best management practices for encountering any wildlife or potential SAR on Site. Should the proposed activities change, an IGF will be completed if required.
		Climate Change	<p>16. Climate change considerations have not been documented in the ESR. The document "Considering Climate Change in the Environmental Assessment Process" (Guide) (www.ontario.ca/page/considering-climate-change-environmental-assessment-process) is now a part of the EA's program's Guides of Codes of Practice. The Guide sets out the ministry's expectation for considering climate change in the preparation, execution and documentation of environmental assessment studies and processes/ The Guide provides examples, approaches, resources, and references to assist proponents with consideration of climate change in EA. The proponent should review this Guide in detail. The ministry expects proponents of Waste Regulation projects to:</p> <ul style="list-style-type: none"> • Consider the project's expected production of greenhouse gas emissions and impacts on carbon sinks (climate change mitigation), as well as resilience or vulnerability of the undertaking to changing climatic conditions (climate change adaptation). • Include a discrete section in the ESR detailing how climate change was considered in the EA. <p>How climate change is considered can be qualitative or quantitative in nature and should be scaled to the project's level of environmental effect. In all instances, both a project's impacts on climate change (mitigation) and impacts of climate change on a project (adaptation) should be considered.</p>	New section 4.5.1 is added to the ESR addressing GHG emissions and impacts on Carbon Sinks.
		Air Quality	<p>17. It is understood that the proposed expansion is to allow operations to continue at the current approved annual fill rate and waste filling capacity and that there are no proposed changes to these limits as part of this project. The proposed expansion would increase the capacity of the landfill by 219,400 m³, which would result in a total capacity of 1,264,4651 m³. Ontario Regulation 232/98 requires the mandatory collection of landfill gas for new or expanding sites with a total waste disposal capacity greater than 1.5 million cubic metres. Given, that the proposed expansion is below this threshold, the mandatory collection of landfill gas is not required.</p> <p>In some cases, air emissions control may still be recommended for smaller sites based on factors such as waste type, site location near a populated area, and operational practices. In this case, the proposed expansion does not include any changes to the waste type currently received at the site (post-diversion solid non-hazardous Industrial, Commercial & Institutional waste) or changes to operational practices. Another important factor is that the site is not located in a populated area and is primarily surrounded by agricultural land uses. It was also noted that there are currently no planned developments around the site. Based on these and other considerations, it was determined that a recommendation for air emissions control was not warranted at this time.</p>	Comment noted.
			18. Section 3.3.1 of the ESR states that the Site-Vicinity Study Area is the area within the vicinity of the Site extending approximately 500 m in all directions. Section 3.3.3.1 states that "there are no residential, institutional, or recreational	Inconsistencies addressed in the ESR. A new sensitive receptors map (Figure 3.10 in the ESR) is included showing the eleven residential properties and the approximate distance of the closest sensitive receptor within the Study Areas.

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			<p>lands designated within the Site-Vicinity Study Area”. However, in Section 3.3.3.11 it states that “the closest residential dwelling is located approximately 232 m northwest of the Site” and that in the overall Local Study Area (LSA), which is within 1 km of the Site-Vicinity Study Area, there are 11 residential dwellings. Section 3.4.4.1 then states that the closest receptor is approximately 165 m from the Site. Based on these statements, the location of the nearest sensitive receptors/residences is unclear. Please clarify. If available (e.g., as part of the ESDM or Odour Management Plan), please also provide a map of the nearest sensitive receptors.</p>	
			<p>19. In Table 2.1 (Screening Criteria Checklist), it was indicated that the proposed expansion may result in an increase in emissions of greenhouse gases associated with continued operation of the Site. Though carbon monoxide concentrations are briefly discussed in the ESR, a more fulsome discussion of greenhouse gases, their mitigation and climate change are omitted. The expectation is that the ESR should include a section dedicated to the discussion of greenhouse gases and climate change and that this discussion includes an assessment of greenhouse gas emissions, and consideration of the following:</p> <ul style="list-style-type: none"> • The effect of the project on climate change; • The effects of climate change on the project; and • Various means of identifying and minimizing negative impacts during project implementation. <p>The goal is to ensure that the project has taken into account alternative methods to reduce its greenhouse gas emissions and negative impacts on carbon sinks and that the project has been planned in a manner that takes into account future changes in climate and the impacts a changing climate could have on the project. Please revise accordingly.</p>	<p>New Section 4.5.1 has been added to the ESR addressing GHG emissions and impacts on Carbon Sinks.</p>
			<p>20. It was noted that odour was one of the concerns raised during the public consultation. It is understood that the site has an Odour Management Plan and standard operating procedure to address odour and odour complaints and that the Odour Management Plan will be updated and submitted as part of the ECA process. In Appendix E the 2021 Operations and Monitoring Report indicates that there were two odour complaints documented in 2021. Please confirm the odour complaint history for 2022 and 2023. Please also include any other complaints related to dust and general air quality.</p>	<p>Three complaints were recorded in 2022 in the months of March, April, and October. No complaints were received in 2023.</p>
			<p>21. In Section 1.5, the ESR notes that some level of construction will be required for the expansion, including re-engineering the Site’s final contours and modification of the northern perimeter access road and stormwater drainage ditch. Though Section 4.4.3 does state that the potential negative environmental effects during construction related to dust and odour will be mitigated through the use of best management practices, Section 4.5 (Air Quality) should also include a discussion of construction impacts and mitigations. In particular, given that TSP levels at the property boundary are already slightly over the Ambient Air Quality Criteria, a specific dust management plan should be developed for the construction period that includes additional/enhanced measures to mitigate dust impacts. Creating a version of the mended. Please revise the ESR accordingly.</p>	<p>Text has been added to Section 4.5.2 of ESR commenting on construction and Dust Management Plan.</p>

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			<p>22. It is understood that the project's air quality and odour assessment was based on a number of supporting documents including the site's existing Emission Summary and Dispersion Modelling (ESDM) Report and Odour Monitoring Program results. Ideally, the air quality assessment documentation in the appendices should include a copy of these reports or sufficient details to support the conclusions made in the body of the ESR. However, the Air Quality and Odour Assessment Report in Appendix D essentially repeats the information provided in the body of the report. Please provide a copy of the site's most recent ESDM and Odour Monitoring Program results to permit a more complete review of the ESR's air quality assessment conclusions.</p>	<p>Copies of the most recent ESDM and Odour Management Plan have been added to the Air Quality and Odour Assessment Report appendices.</p>
		Air Compliance	<p>23. Odour/Odour Management Plan – A revised Odour Management Plan should be provided that incorporates the future configuration and operations at the site and updated sensitive receptors.</p>	<p>A copy of the most recent Odour Management Plan has been added to the Air Quality and Odour Assessment Report appendices</p>
			<p>24. ESDM Report / Reg.419/05 compliance – The ESR document indicates a modelled off-site concentration for Suspended Particulate Matter above the Ministry's 24-hour limit of 120 ug/m³ (at 122.4ug/m³). The non-compliance should be addressed.</p>	<p>Particulate matter was previously assessed and approved. There have been no changes to the concentrations that were originally approved.</p>
			<p>25. Leachate Treatment System – How will the prolonged operation of the site and the potential for increased leachate generation rates impact the design, operation or effectiveness of the leachate treatment system?</p>	<p>The incorporation of Stage 9 is predicted to increase the peak leachate generation rate from 46 to 49 m³/day. Post-closure leachate generation rates are estimated at 39 m³/day. The Leachate Treatment System is designed with a treatment capacity of 200 m³/day. As such, no impacts to the design, operation, or effectiveness of the leachate treatment system are anticipated due to construction of Stage 9.</p> <p>As with the current approved design, peak leachate generation rates are predicted to exceed the approved daily average of 45 m³/day for discharge to the roadside ditch. During periods where leachate generation is greater than 45 m³/day, excess treated effluent will be temporarily stored in effluent discharge holding tanks prior to loading into tanker trucks for hauling off-site for disposal at an approved facility. Post-closure leachate generation rates are predicted to remain below the average daily roadside ditch discharge limit.</p>
		Noise Quality	<p>26. Screening Report Section 3.5.3.1 / Appendix E Section 3.1.3: How is the concern with tracked vehicle noise being addressed?</p>	<p>Tracked vehicles were evaluated as steady state noise sources in App E report & Feb 2024 ECA AAR update. See Section 3.2.5.</p>
			<p>27. Screening Report Section 3.5.4.2 / Appendix E Section 3.2.2: Please refer to the MECP guideline document "Noise Guidelines for Landfill Sites" dated October 1998 for assessment of noise impact(s) of the offsite haul route.</p>	<p>Per Noise Guidelines for Landfill Sites 1998, "For a landfilling site employing off-site source vehicles (i.e. vehicles hauling waste or cover material to the site) that constitute a predominant component of the background noise, an access route should be selected which will result in a minimum noise impact. The selection process should be based on a detailed quantitative assessment of noise impact on individual receptors and the number of affected receptors along the alternative routes."</p> <p>This EA is for the vertical and horizontal expansion of the landfill capacity and there are no operational changes proposed to the daily or annual tonnage of waste received or routes used by haul trucks. Therefore, off-site haul routes were not evaluated. The landfill guideline is to evaluate potential alternatives during the design phase which is not applicable in this instance.</p>

Date of Comment	Method of Communication	Topic	Comment from MECP	How the Comment was Considered
			28. Screening Report Section 3.5.5.1 / Appendix E Section 3.2.5: <ul style="list-style-type: none"> • It appears that the numbers of some noise sources (i.e., enclosed leachate aerator, bulldozers) are not the same as those given in the Acoustic Assessment Report submitted in support of the application for ECA No. 7323-C6EJUM. Please clarify. • Will there be cover moving operations outside of the daytime operating hours? • Please note that NPC-300 is the basis for assessment of ancillary noise sources. • It is preferred that the sound emission levels of any existing equipment for which access can be provided be obtained through sound level measurements. 	<ul style="list-style-type: none"> • The only difference is that the ESR noise assessment includes 2 compactors and the new Feb 2024 Acoustic Assessment Report (AAR) has 1. As the ESR report is conservative with the higher number of compactors, no edit is required. • Both the ESR and AAR confirm no cover operations outside daytime operations. • Noted. ESR and AAR document the evaluation of ancillary sources separately against NPC-300. • Noted.
			29. Please comment on any possibility of vacant lot points of reception in the agriculture zones near the facility.	Per previous MECP reviews of the ECA AARs the review of potential vacant lots has been completed and approved by the MECP. Anthony Martella (noise review engineer) confirmed this back in 2021 ECA review. GHD again reviewed the zoning to confirm there is no potential vacant lots that need to be evaluated.
		Final Comments	Thank you for circulating this draft ESR for the ministry's consideration. Please document the provision of the draft Report to the ministry as well as this Project Review Unit Comments letter in the final report, and please provide an accompanying response letter to support our review of the final report. A copy of the final Notice should be sent to the ministry's West Central Region EA notification email account (eanotification.wcregion@ontario.ca).	Comment noted

Comments on Brooks Road Landfill expansion ESR

Table 2 Comments from MCM on the ESR

Date of Comment	Method of Communication	ESR Section	Comment from MCM	Response				
02/05/2024	Email	General comments	<p>The draft ESR should better document the due diligence related to cultural heritage resources, e.g., the screening carried out to identify them, or measures to be taken to avoid or mitigate impacts on them. MCM's letter, dated December 4, 2023, included advice on how to screen the project area for cultural heritage resources. We have the following comments and recommendations:</p> <ul style="list-style-type: none"> We continue to recommend that the EA project be screened using the Ministry's <i>Criteria for Evaluating Archaeological Potential</i> to determine if an archaeological assessment is needed. If the EA project area exhibits archaeological potential, then an archaeological assessment (AA) shall be undertaken by an archaeologist licensed under the <i>Ontario Heritage Act</i> (OHA), who is responsible for submitting the report directly to MCM for review during this planning phase. Any further recommended archaeological assessments (e.g., Stage 2,3,4) should be completed as early as possible during detailed design and prior to any ground disturbing activities. The screening checklist, <i>Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes</i>, developed by the Ministry of Citizenship and Multiculturalism, was completed as part of the Environmental Screening Report (see Appendix G) determining that the study area has low potential for built heritage resources and cultural heritage landscapes. Therefore, no technical cultural heritage studies have been undertaken. 	<p>The Checklist for evaluating Archaeological Potential is completed and attached as Appendix G1 in the ESR.</p> <p>The Checklist for evaluating the Potential for Built and Cultural Heritage Resources and Landscapes is completed and attached as Appendix G2 in the ESR</p>				
		3.7 (Cultural Heritage) p. 79-80	<table border="1"> <thead> <tr> <th data-bbox="857 937 1532 969">Original Text</th> <th data-bbox="1532 937 2365 969">Proposed Changes</th> </tr> </thead> <tbody> <tr> <td data-bbox="857 969 1532 1848"> <p>3.7 Cultural Heritage Existing Conditions</p> <p>3.7.1 Study Area</p> <p>The Cultural Heritage Study Areas to be discussed in relation to the preparation of this ESR are as follows:</p> <ul style="list-style-type: none"> - SSA: Including all lands (i.e., 14.3 ha) within the existing, approved boundaries of the Site - LSA: Including all lands and waters within a 1 km radius of the SSA boundaries including agricultural, residential, and municipal properties <p>3.7.2 Methodology</p> <p>Available secondary sources of information were collected and reviewed to determine Heritage and Culture existing conditions within the LSA. The following sources of secondary information were collected and reviewed:</p> <ul style="list-style-type: none"> - Heritage Haldimand Designated Properties Inventory <p>3.7.3 Existing Conditions</p> <p>3.7.3.1 Heritage</p> <p>Following a review of the Heritage Haldimand Designated Properties Inventory it was concluded that there are no heritage properties located within the LSA. The completed "Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes: A Checklist for the Non-Specialist" (See Appendix G) identifies the Site as having no potential for cultural heritage resources. The Brooks Road Landfill Site is</p> </td> <td data-bbox="1532 969 2365 1848"> <p>Please note that the description of existing conditions for the cultural environment should be separate from the description for natural heritage and agriculture as these are different aspects of the environment. We recommend re-organizing and revising section 3.7 in the following manner:</p> <p><i>See text to be removed crossed out and to be included underlined.</i></p> <p>3.7 Cultural Heritage Existing Conditions <u>Environment</u> <u>Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes.</u></p> <p>3.7.1 Study Area</p> <p>The Cultural Heritage Study Areas to be discussed in relation to the preparation of this ESR are as follows:</p> <ul style="list-style-type: none"> - SSA: Including all lands (i.e., 14.3 ha) within the existing, approved boundaries of the Site - LSA: Including all lands and waters within a 1 km radius of the SSA boundaries including agricultural, residential, and municipal properties <p>3.7.2 Methodology</p> <p>Available secondary sources of information were collected and reviewed to determine Heritage and Culture existing conditions within the LSA. 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Date of Comment	Method of Communication	ESR Section	Comment from MCM	Response	
			<p>within the Grand River watershed, which is considered to be a Canadian Heritage River watershed and, therefore, the checklist indicates that there is potential for cultural heritage resources on the property. However, given that the entire Site has been disturbed, it can be confirmed that there is no potential for cultural heritage resources on-Site.</p> <p>3.7.3.2 Cultural In the Study Areas disturbed and actively managed areas of the clay stockpile are classified as areas with cultural heritage potential. The vegetation community of the vegetated portion of the clay stockpile is comprised of low growing pigweed (<i>Chenopodium album</i>), white sweet clover (<i>Melilotus Alba</i>), bird's foot trefoil (<i>Lotus corniculatus</i>), and Queen Anne's lace (<i>Daucus carota</i>), many of which are non-native. Somme remnant woody debris and stumps are present at the toe of the stockpile on Site property.</p> <p>3.7.3.3 Agricultural The entire Site has been subjected to recent, extensive and intensive disturbance and it is therefore considered that the Site does not have any archaeological potential. While there may be areas within the LSA that have archaeological potential, as these areas will not be disturbed by the proposed expansion, it was concluded that an assessment of the archaeological potential within the LSA was not necessary. The completed "Criteria for Evaluating Archaeological Potential: A Checklist for the Non-Specialist" confirms the site does not possess archaeological potential. See Appendix G for Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes form.</p>	<p>3.7.3 Existing Conditions 3.7.3.2 Cultural In the Study Areas disturbed and actively managed areas of the clay stockpile are classified as areas with cultural heritage potential. The vegetation community of the vegetated portion of the clay stockpile is comprised of low growing pigweed (<i>Chenopodium album</i>), white sweet clover (<i>Melilotus Alba</i>), bird's foot trefoil (<i>Lotus corniculatus</i>), and Queen Anne's lace (<i>Daucus carota</i>), many of which are non-native. Somme remnant woody debris and stumps are present at the toe of the stockpile on Site property.</p> <p>3.7.3.1.3 <u>Archaeological Resources Agricultural</u> The entire Site has been subjected to recent, extensive and intensive disturbance and it is therefore considered that the Site does not have any archaeological potential. While there may be areas within the LSA that have archaeological potential, as these areas will not be disturbed by the proposed expansion, it was concluded that an assessment of the archaeological potential within the LSA was not necessary. The completed "Criteria for Evaluating Archaeological Potential: A Checklist for the Non-Specialist" confirms the site does not possess archaeological potential. See Appendix G for Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes form.</p> <p>[The suggested text below is if the checklist indicates that there is low potential for archaeological resources] <u>The screening checklist, Criteria for Evaluating Archaeological Potential, developed by the Ministry of Citizenship and Multiculturalism, was completed as part of the Environmental Screening Report (see Appendix X) determining that archaeological potential within the study area is low and therefore archaeological assessment was not undertaken.</u></p> <p>[The text below would apply if the checklist indicates that the study area has archaeological potential]</p> <p>A Stage 1 archaeological assessment (AA) (under Project Information Form number XX) was undertaken on [Date] by [Consultant] in support of this project. A Stage 1 AA consists of a review of geographic, land use and historical information for the property and the relevant surrounding area. Its purpose is to identify areas of archaeological potential and further archaeological assessment (e.g., Stage 2, 3, and 4) as necessary. The Stage 1 AA has been entered into the Ontario Public Register of Archaeological Reports. The Stage 1 AA is included in Appendix X.</p> <p>[Please include the Stage 1 and MCM letter indicating that the report has been entered into the Register. Then include the outcomes and</p>	

Date of Comment	Method of Communication	ESR Section	Comment from MCM		Response
			<p>recommendations of the report, as is in the Executive Summary – just copy and paste, don't summarize.]</p> <p>3.7.3.2. 4 <u>Built Heritage Resources and Cultural Heritage Landscapes</u></p> <p>Following a review of the Heritage Haldimand Designated Properties Inventory it was concluded that there are no heritage properties located within the LSA. The completed "Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes: A Checklist for the Non-Specialist" (See Appendix G) <u>was completed</u> and identifies the Site as having</p> <p>no potential for cultural heritage resources. The Brooks Road Landfill Site is within the Grand River watershed, which is considered to be a designated Canadian Heritage River watershed. and, therefore, the checklist indicates that there is potential for cultural heritage resources on the property. However, [Please explain whether there could be any known heritage attributes that could be impacted] given that the entire Site has been disturbed, it can be confirmed that there is no potential for cultural heritage resources on Site.</p> <p>[MCM may have additional advice once it has reviewed the final ESR.]</p>		
		4.9 (Cultural Heritage - Potential Environmental Effects, Mitigation Measures, and Net Environmental Effects) p. 109	<p>Original Text</p> <p>There are no known heritage buildings, structures or sites, archaeological sites or areas of archaeological importance, or cultural heritage landscapes on the Site, which was confirmed through completion of the Vertical Capacity Expansion EA via the Ministry of Heritage, Sports, Tourism, and Culture Industries (MHSTCI) checklists: the Criteria for Evaluating Archaeological Potential; and the Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes.</p> <p>If there are areas within the LSA that may have heritage, cultural archaeological potential, these areas will not be disturbed by the proposed expansion.</p>	<p>Proposed Changes</p> <p>We recommend removing this section in its entirety and replacing it with the following mitigation measures addressing impacts to the cultural environment:</p> <ul style="list-style-type: none"> - Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the <i>Ontario Heritage Act</i>. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the <i>Ontario Heritage Act</i>. - The <i>Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33</i> requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11 the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery, which administers provisions of that <i>Act</i> related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the <i>Ontario Heritage Act</i>. <p>[MCM may have additional advice once it has reviewed the final ESR.]</p>	Comment noted and proposed changes made to the ESR.

Date of Comment	Method of Communication	ESR Section	Comment from MCM		Response
		4.11 (Summary of Net Environmental Effects) Table 4.5 p. 111	<p>Original Text</p> <p>Environment Component - Cultural Heritage</p> <p>Summary of Predicted Net Environmental Effects - There are no known heritage buildings, structures or sites, archaeological sites or areas of archaeological importance, or cultural heritage landscapes on the Site; therefore, no net negative effects in terms of Cultural Heritage are expected from the proposed expansion.</p>	<p>Proposed Changes</p> <p>We recommend removing this table row in its entirety and replacing it with the following text for consistency with ESR section 3.7: Environment Component - Cultural Heritage</p> <p>Summary of Predicted Net Environmental Effects [The suggested text below is if the checklist indicates that there is low potential for archaeological resources] - The screening checklist, Criteria for Evaluating Archaeological Potential, developed by the Ministry of Citizenship and Multiculturalism, was completed as part of the Environmental Screening Report (see Appendix X) determining that archaeological potential within the study area is low and therefore archaeological assessment was not undertaken.</p> <p>[The text below would apply if the checklist indicates that the study area has archaeological potential] - A Stage 1 archaeological assessment (AA) (under Project Information Form number XX) was undertaken on [Date] by [Consultant] in support of this project. The Stage 1 AA has been entered into the Ontario Public Register of Archaeological Reports recommending [Insert whether further AA is recommended (e.g., Stage 2,3,4). The Stage 1 AA is included in Appendix X.</p> <p>[Please include the Stage 1 and MCM letter indicating that the report has been entered into the Register. Then include the outcomes and recommendations of the report, as is in the Executive Summary – just copy and paste, don't summarize.] - The screening checklist, Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes, developed by the Ministry of Citizenship and Multiculturalism, was completed as part of the Environmental Screening Report (see Appendix X) determining that the study area has low potential for built heritage resources and cultural heritage landscapes. Therefore, no technical cultural heritage studies have been undertaken.</p> <p>[MCM may have additional advice once it has reviewed the final ESR.]</p>	Comment noted and proposed changes made to the ESR.



Comments on Brooks Road Landfill expansion ESR

Table 3 Comments from GRCA on the ESR

Date of Comment	Method of Communication	ESR Section	Comment from GRCA	Response
02/13/2024	Email	General comments	<p>Due to the length of time since wetland boundaries were last confirmed (nearly 10 years ago), a reconfirmation of these boundaries with GRCA staff should be completed for wetlands within our jurisdiction.</p> <ul style="list-style-type: none"> Please contact GRCA with a preferred date for wetland confirmation in the growing season. Boundaries should be pre-flagged by a qualified professional prior to GRCA's arrival on-site. <p>Clear demonstration that the proposed expansion will not have long-term hydrologic impacts on the water balance of adjacent wetlands compared to existing (pre-expansion) conditions should be provided. The assessment should be scoped to the sensitivity of the wetland features present, and the scale of the proposed expansion's potential impact on the wetlands' hydrology. Additionally, potential temporary impacts of site grading, construction and dewatering activities on groundwater and surface flow towards the adjacent wetlands should be assessed, with mitigation measures proposed as needed.</p> <p>In light of this outstanding information, we would request that an environmental impact study (EIS) be completed as part of the Class EA process to clearly address potential wetland impacts. Terms of Reference should be submitted to our office for confirmation prior to work being undertaken.</p>	<p>An EIS will be completed prior to applying for GRCA permit (including consultation with the GRCA and preparation of a Terms of Reference).</p> <p>Long-term effects to water levels within the wetlands to the north are not expected given that the cell construction period will be temporary and groundwater discharge to the cell during the construction phase will be minor. Based on the relatively low hydraulic conductivity of the natural soils and associated slow groundwater flow velocity, it is not anticipated that significant effects to groundwater levels in the vicinity of the wetlands will be observed during the cell excavation/construction period. All non-contact stormwater and run-off on the site currently discharges to the on-site stormwater management pond. This water management practice will not change under the scenario of cell construction. Accordingly, it is not expected that changes to site grading will affect run-off or stormwater contributions to the wetland to the north.</p>

Comments on Brooks Road Landfill expansion ESR

Table 4 Public comments on the ESR

Comment #	Date of Comment	Method of communication	Topic	Public comment	Response
1	01/29/2024	Letter	Paving the on-site road	In the Ministry Review of 2017 the BRE landfill site vertical capacity expansion assessment, BRE stated “omission of commitment to pave the future on-site road from table 7.4 was an oversight on our part. BRE is committed to paving the on-site road as part of the site design for the vertical expansion. This was considered as a mitigation measure through design, as noted in table 5.16, and is essential to ensuring on-site operations remain in compliance with ministry standards.” My question, has the on-site road been paved?	Road is scheduled for paving in 2024.
2			Water run-off/collection	In the spring of 2023, after very heavy rains, I observed from the air, what appeared to be water run-off from the waste site on the northeast face into neighbouring land. This was mentioned at the June PLC meeting, and I requested a site visit to see the method of water collection. It took until October to get the site visit, which was interesting. However, Diane and I were kept so far away from the northeast corner (approximately 250 meters) as to be useless to see what I had requested. I have no proof that the contouring and ditches were inadequate. However, during the visit there was machinery working on the face and perimeter. In November, further observation showed large perimeter ditches and contouring to handle water run-off. I am convinced the work was accomplished because of my inquiries.	Comment Recorded
3			Method of calculating tonnes to cubic meters	In the environmental assessment of 2017, a Rick Li from MOECC questioned the method of calculating tonnes to cubic meters. BRE uses 1 tonne to a cubic meter. Rick Li stated it is normally 0.7 tonnes to a cubic meter. Anything less than 1 tonne per cubic meter would trigger a mandatory landfill gas collection system at BRE. It would financially be in BRE’s interest to not need a gas collection system. Who does the calculations? Does the MOECP do any oversight on this?	<p>Waste density varies by type of waste and compaction efforts. Waste densities are calculated annually based on weigh scale records and air space usage, based on topographic surveys. The density estimate is included in annual reports submitted to the MECP. The average waste density between 2018 and 2022 was 1.956 tonnes per cubic metre.</p> <p>With that said, the threshold for a mandatory landfill gas collection system is a total waste disposal volume of 1.5 million cubic metres. The total Site waste volume is based on the approved base grades (top of granular drainage blanket) and final contours (top of waste). Including Stage 9, the total Site waste volume (1,264,465 cubic metres or 1.26 million cubic metres) remains below the 1.5 million cubic metre threshold.</p> <p>Additionally, and based on the type of waste accepted at the Site, Section 15(3) of Ontario Regulation 232/98 generally exempts sites from requiring a landfill gas collection system where it can be demonstrated that “the nature and quantity of landfill gas generated at the site is not likely to be of significant concern”. Appendix H of the Design and Operations Report Rev. 2 provides an evaluation of the landfill gas generated at the Site and demonstrates that a landfill gas collection system is not feasible for the Site, based on low landfill gas generation rates.</p>

Comment #	Date of Comment	Method of communication	Topic	Public comment	Response
4			Waste diversion protocol	Waste Diversion- In the environmental assessment of 2017 the ministry was not satisfied with the response from BRE. BRE was to develop a waste diversion protocol which provides information on the ways that BRE will work with waste generators to provide at source diversion. Was a waste diversion protocol made? If so, what is it?	Yes, a Waste Diversion Protocol was prepared and is included in the Design and Operations Plan (Waste Screening and Acceptance). Based on the waste material accepted, limited recyclable materials are encountered. BRE maintains a portion of the Site for collection and temporary staging of segregated recyclable materials.
5			Gas emissions	In the draft BRE environmental screening document under the yes and no criterion there a yes to every gas emission question. How can anyone approve the expansion? Who would be responsible if it turns out like the Stony Creek expansion?	The screening criteria is used to determine if that criterion is to be assessed as part of the EA. The assessment of potential effects, proposed mitigation and resultant net effects related to gas emissions are documented in Section 4.5. The proponent, Brooks Road Environmental, is responsible for implementing the undertaking as outlined in the ESR, including implementing identified mitigation and monitoring measures.
6			Risks to aviation	In the draft BRE environmental screening document it mentions airports. It states, "A private airfield used for soaring is located approximately 7.5 km north of the site". The distance is accurate, but the rest is not. The airport name "Grand River Executive Airport". There are approximately 20 aircraft parked there. There is a flight training school and an aircraft maintenance base. There is a private airport 1.2 km south of the dump site and a sky diving airport approximately 2.5 km east of the site. Any organic waste will bring birds. This is a hazard to aviation.	According to the ECA, the landfill is permitted to receive only solid non-hazardous ICI waste, including contaminated soils, and processed organic waste (e.g., dewatered sewage sludge from the Caledonia Sewage Treatment Plant). Since the landfill does not accept municipal organics, it significantly reduces birds on site. Daily landfilling activities (e.g., noise, human presence, heavy machinery) as well as operational practices (i.e., daily cover) provide deterrents for use of the Site by birds.
7			Gates, daily cover, fencing	Over the years I and neighbours have caught BRE not putting on daily cover. We have pictures. It was reported to the MOE at the time. We do not inspect every day and I'm sure this was a common occurrence. Gates were left open when nobody was at the site, contrary to the ECA. We have pictures. There was inadequate fencing for many years. It was not up to the ECA standard. This was reported to the MOE. It took a long time but was finally fixed.	Comment Recorded
8			Expansion on north rail line	Why is there a screening process for expansion of landfill on the North rail line. I attended a notice of public meeting, June 17, 2014. The meeting was to rezone a portion of the north rail line into the waste disposal area. It was assured by the proponent that no land filling on the added lands would occur, and no change to the existing waste footprint would take place. I have documentation if necessary. The rail line was to be used for a buffer zone. This was also mentioned again in a capacity expansion environmental assessment of July 2017.	The assurances made at the time of the zoning change are correct. Landfilling of waste is designated for the existing waste site and within the original property boundary. Waste placement will not occur on the rail land property. The rail lands continue to be used as a buffer zone.
9			Genera comments against expansion	BRE is a company that will say something to get what they want, but not follow through. Can we believe what they say? BRE have not followed the ECA and the MOECP does very little oversight. The environmental screening should not be granted because they have shown they cannot manage what they already have according to government guidelines. I would be interested in the name of the person who decides to grant or reject the application.	Comment Recorded. The Brooks Road Landfill Expansion project is undergoing an Environmental Screening Process, which is a proponent-driven, self-assessment process, and does not require approval by the Ministry. However, as required, BRE has consulted with affected government agencies including the MECP regional office. The Ministry has provided comments on the Draft ESR, which are being addressed. Our Regional office MECP contact is: Joan Del Villar Cuicas Environmental Resource Planner & EA Coordinator

Comment #	Date of Comment	Method of communication	Topic	Public comment	Response
					joan.delvillarcuicas@ontario.ca
10	02/01/2024	Letter (maybe email)	General protest and comments against expansion	This is a protest from Haldimand County Residents against the Brooks Road Landfill Capacity Expansion. Presently the Brooks Landfill is at 100,000 cubic metres and they want to increase it to 219,400 cubic metres. The information that received at the on going PLC meetings that the dump should have been filled to capacity roughly by the past June or end of this year.	Comment Recorded
11	02/08/2024	Letter	General comments against expansion	I have lived on Concession 1 with my family for the past 45 years. Since 2016, I have been faithfully going to meetings to try and understand the proposed expansion of the Brooks Road Landfill and its impacts, to no avail. The information provided to date has been inadequate to fully understand and comment on the impacts of the expansion of the landfill. Because of this and concerns I have about BRE's ability to comply with existing requirements, I am against this expansion for the Brooks Road Landfill. While BRE has undertaken "consultation" the quality of the information provided is not sufficient to understand the impacts from the expansion and proposed mitigations. Their history of non-compliance and lack of consideration for social impacts means I do not have confidence the expansion won't negatively impact the environment and the local community. I do not support the expansion of the landfill site.	Comment Recorded
12			Financial impacts to the area	<p>BRE has suggested the expansion to the landfill will provide positive financial impacts to the area. The following statement was in the request for the vertical expansion... "BRE also considered employment opportunities provided by the continued operation of the Brooks Road Landfill Site." Is the Brooks Road Landfill employing Haldimand County residents and if so how many?? How many out of county people are employed? What economic development is Haldimand County receiving from the landfill? How are we (the residents of Haldimand County) going to benefit financially? This idea was also questioned by our former CEO Don Boyle, in the fall of 2016 and the question that still remains is why are we allowing the Brooks Road Landfill to keep growing when Haldimand County closing down live landfill sites and not receiving any major benefit, other than some donations to the food bank.</p> <p>Why is there no broader community benefits sharing approach, or proximity payments to neighbours of the site who have to deal with all the impacts?</p>	<p>BRE employs a combination of people who reside within the boundary of Haldimand County and adjacent municipalities.</p> <p>BRE provides a positive economic impact by:</p> <ul style="list-style-type: none"> • accepting waste material from Haldimand's Operation department; • Payments associated with hauling treated effluent to Haldimand's waste water treatment plant; • Sourcing fuel, potable water, equipment, materials, and many on-going services to companies located in Haldimand County and the adjacent areas; • Donating clay material to assist 6 Nations with the material needed for final cover installation to allow their landfill to meet closure requirements. <p>BRE would be willing to restart a program that would provide to support to the broad community programs such as the food bank or community related projects that benefit the entire community. BRE would be pleased to support local sports teams through jerseys, sponsoring which provides wide benefits to the whole community .</p>
13			Leachate	Leachate – The last leachate volume we were provided was October 2023 which was 192.5 metres (leachate elevation) and that 1,936,000 litres of leachate had been trucked out in October.	Leachate or contact water is contained within the landfill cell footprint and is either hauled out of the landfill by truck (and discharged at an approved wastewater treatment plant receiver) or treated in the on-site leachate treatment system. The Site is graded to convey clean stormwater away from active landfilling areas to reduce leachate generation.

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				How is BRE managing additional run-off and ensuring ground water is not contaminated. There was no information provided on how environmental changes and an increase in abnormal weather events, including heavy rainfalls and flooding will affect measures in place to stop contamination. Is the runoff being contained to the outer ditch or did it flood into nearby areas, ditches and streams like flooding everywhere else in the County?	Clean stormwater is conveyed to on-Site internal perimeter ditching that directs collected stormwater to the existing stormwater management (SWM) pond. Site grading, ditching, and the SWM pond have been designed to manage storms up to and including the 100-year storm, noting that the stormwater management pond performance allows sufficient capacity for multiple storm events. Modelling of the 100-year storm event indicates that approximately 0.44 metres of vertical capacity will remain in the SWM pond prior to overflow conditions occurring.
14			Draft summary of the ESR is long and technical	The Draft Environment Screening document is 2617 pages. The “summary” presentation provided contains very little information and suggests the expansion of the landfill site will have no impacts on anything. How does BRE expect the general public to read and interpret 2617 pages of technical information and why hasn’t the information been provided in a simplified format which actually contains information people require to make an informed submission?	The Environmental Screening Report itself is a 120-page document that provides a summary of technical studies undertaken for the project. The appendices include technical reports to support the results and findings of the studies. BRE conducted two Public Open Houses to provide information regarding the project in a simplified format including display boards with figures and key points.
15			Advantages of the expansion unclear	Page 127 Summary and Conclusion Environmental Screening Report says, “It was concluded that minor environmental impacts are expected....As a result the advantages of the project outweigh the disadvantages”. I am still unclear as to what the advantages of the expansion are. And have the social impacts of the expansion been considered as part of that conversation.	The advantage of the Project is that it will provide BRE with an opportunity to respond to the growing demands from existing customers (waste generators) who need a safe and reliable waste management facility for their residual material for approximately two additional years.
16			Methane gas emissions	Methane Gas Emissions – The monitoring network comprises six nested gas probes installed in three on-site locations (two gas probes per nest) 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. This is “IN Progress”. In response to initial comments on the expansion BRE noted, “ based on the GHG modeling that has been conducted, the low level of methane generation at the Brooks Road Landfill and the negative energy and economic factors associated with a gas collection and control system, it has been demonstrated that the operation of a landfill gas collection system is not feasible.” They note this will be revisited in future if it becomes a problem. I take this to mean, we don’t want to spend money on management measures to reduce methane gas emissions. If the landfill will make more money through expansion and intends to take in more refuse which will produce more methane gas, a gas collection and control system should be required, and the cost to implement should not be a relevant consideration for an environmental impact assessment.	Inclusion of Stage 9 will increase the capacity of the landfill by 219,400 cubic metres, which will result in a total capacity of 1,264,465 cubic metres (or 1.26 million cubic metres). As noted in the response to Comment #3, Ontario Regulation 232/98 requires the mandatory collection of landfill gas for new or expanding sites with a total waste disposal capacity greater than 1.5 million cubic metres. Given, that the inclusion of Stage 9 remains below this threshold, the mandatory collection of landfill gas is not required. Additionally, based on the type of waste accepted at the Site and as demonstrated in Appendix H of the Design and Operations Report Rev. 2, a landfill gas collection system is not feasible for the Site. The Site is exempt from requiring a landfill gas collection system in accordance with Section 15(3) of Ontario Regulation 232/98 as it has been demonstrated that “the nature and quantity of landfill gas generated at the site is not likely to be of significant concern”. There are 12 landfill gas probes installed at five locations around the landfill cell that are monitored, as required in the ECA. The landfill gas probes are intended to monitor for subsurface migration of landfill gas outside the landfill footprint (i.e., prior to Site boundary and near buildings/structures).
17			Transparency regarding current and future plans for the site	In 2016 when the application for the vertical expansion was being reviewed...”Since the landfill will be expanded vertically and there will be no change to the footprint of the landfill area or vegetation removal, no impacts to vegetation communities and the North Cayuga Swamp Wetland Complex are anticipated. There are also no anticipated impact to aquatic ecosystems as leachate and stormwater runoff will be contained and treated within the landfill Site prior to discharge to the natural environment.” BRE received approval for the vertical expansion and now BRE is asking for a footprint increase? One of my	BRE intends to continue serving its existing customer base and is responding to the economic opportunity of providing waste management services to address the continued and growing demand from local and regional customers that require a facility that is permitted to manage the residual materials they generate. With this in mind, BRE reviewed the potential to expand this site further based on: – The current post-diversion solid, non-hazardous industrial residual material generated in Ontario, requiring a local, safe, and secure disposal facility

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				<p>comments in 2016 was “when will this (expansions to Brooks Road Landfill) stop? Will it ever? Once BRE gets approval they begin plans for another expansion. Expansion after expansion and all we hear is there won’t be impacts, current mitigation measures are enough. How can that be true? And why has the company not been transparent with the community about current and future plans for the site?”</p>	<p>– Future post-diversion solid, non-hazardous industrial residual material generated in Ontario, requiring a local, safe, and secure disposal facility</p> <p>– Development and analysis of potential long-term disposal capacity options that BRE could implement in order to continue providing waste management disposal services to their current businesses and customers.</p> <p>Extending the life of the Site will provide BRE with increased flexibility in terms of how best to serve its existing waste clients while remaining competitive within the marketplace.</p> <p>The scarcity of licensed approved disposal sites makes Brooks Road landfill an essential service to the community and region at large and by providing proximity to various construction sites, it reduces the carbon transportation footprint by reducing transportation distances thereby reducing GHGs.</p>
18			Site design	<p>Site design and operations 5.0 in the Annual Compliance report for 2022-2023 – Vegetating by planting trees or shrubs on top of the berm along the western property as required will minimize visual and noise impacts...it says “Compliance Achieved”.</p> <p>All the vegetation on the west berm by the Brooks Road is weeds, so you can see the landfill from the road because of the vertical expansion and also from highway 3 and neighbouring residents. Visual impact continues to remain an issue and will have more of an impact once the vertical footprint increases. Minimal planting of ground cover is not an effective mitigation to visual impact and noise.</p>	<p>The landfill is screened along the western property boundary by a vegetated screening berm constructed to an elevation of approximately 203 to 204 metres above mean sea level (m AMSL), approximately 5 to 6 m higher than the Brooks Road approximate elevation of 198 m AMSL.</p> <p>A fence with a privacy screen has been installed on top of the western screening berm, increasing the visual barrier to an elevation of approximately 205 to 206 m AMSL (almost 8 m higher than Brooks Road).</p>
19			Expansion on north rail line	<p>The former CSR rail bed (4.7 acres), which BRE was given to be used for clean spoil stockpiling, also to form a hydrological divide between the landfill and the wetland complex to the north. Permanent erosion and sediment control measures such as heavy duty silt fencing and a vegetative buffer are in place at the north toe of the clay stockpile slope. The CSR corridor will remain as a buffer between the landfill Site and the wetland complex. This expansion will change the buffer zone and there will be less space for the clean spoil. Is this expansion on the 4.7 acres? My understanding is that is not the intended land use for that area.land!!</p>	<p>Landfilling is designated for the existing waste site and within the original property boundary. Waste placement will not occur on the rail land property. The rail lands continue to be used as a buffer zone, and will continue to be used for stockpiling of clean soil during construction, filling, and closure activities at the Site.</p>
20			Paving the on-site road	<p>A potential condition of approval for the vertical expansion was the commitment to pave the future on-Site road, as mentioned by the ministry’s Air Quality Analyst; therefore road paving is imperative in conjunction with other mitigation strategies for controlling fugitive dust emissions from the landfill operations. Omission of the commitment to pave the future on-Site road was an oversight on the part of BRE, as BRE is committed to paving the on-Site road as part of the Site design for the vertical expansion.</p> <p>This was considered as a mitigation measure through design and is essential to ensuring on-Site operations remain in compliance with Ministry standards. This still has not been done. If BRE can not comply with this simply request, how can we be confident they will manage their other environmental mitigation obligations.</p>	<p>Road is scheduled for paving in 2024.</p>

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21			Traffic and road maintenance	<p>When passing by the Landfill the week of January 29th Brooks Road was extremely muddy with large clumps of mud from the Landfill right out to highway 3. Also the Brooks road is damaged with lots of potholes due to all the heavy truck traffic. Trucks don't always use the approved haulage route. The summary report noted there would be no impacts from traffic as truck traffic wasn't set to increase. I'm curious to understand the methodology used to assess this. Was it only a desktop assessment with tonnage figures and approved haulage routes. Or did the subject matter expert, actually come out to site for a several days and count trucks and look at the actual route they take? How is BRE contributing to the upkeep and maintenance of the roads its trucks damage.</p>	<p>The state of Brooks Road with respect to potholes is a Township issue and should be dealt with by the Township when they review their road network and decide which roads need improvements. As Brooks Road is used by trucks to access the BRE landfill, it should be designated as a truck route and should therefore include a pavement structure that can accommodate heavy truck traffic.</p> <p>Truck traffic is not set to increase because there is no change to the annual fill rate limits with the proposed expansion. The project is proposing to increase the capacity of the landfill to be operational for approximately two additional years.</p> <p>GHD completed one weekday and one Saturday count at the site driveway and at Hwy 3 to get the a.m., mid-day, and p.m. peak hour turning movement counts and observed what routes the vehicles took. At the time of the count, there was actually had more traffic to/from the site than usual due to some transfer of clean clay to another property which resulted in an additional 75 loads throughout both days.</p> <p>BRE is not required to maintain Brooks Road, this is the responsibility of the Township of Cayuga.</p>
22	February 1, 2024	Email	Site Operations	<p>We have lived on the McFarlane Rd. for 48 years on a piece of property where we have planted pine and walnut trees that have matured into a little park. We have a little running stream, lots of wild life and before the dump fresh odourless air to breath. Now we breathe methane gas air.</p> <p>Methane gas is hazardous to our health and well being. It causes cancer, heart and lung disease. I note the summary from the Environmental Screening Report indicated the expansion will have no impact on recreational activities, however on warm windy days, I can no longer enjoy sitting outside by the pool because of the smell which travels from the facility.</p> <p>While the report suggests all environmental impacts are negligible because mitigation and management measures are currently in place, I raise serious concerns about the proponents compliance with said management measures.</p> <p>The proponent is not overseeing the dump with the regulations they promised to implement.</p> <p>Secure fencing was only put in place after the community requested it for safety reasons, despite being a requirement to stop wildlife from entering the site.</p>	<p>Comment noted.</p>
23			Odour	<p>The report indicates "best practice" odour management will be implemented. There is no detail on what this means. The existing site currently emits a foul odour of methane gas. It occurs even when there is no wind, damp, and foggy. It travels south and sits in the gully. What "best practice" measures have been put in place to mitigate odour, what additional mitigations will be put in place from the expansion and what improvements have been made in odour control?</p>	<p>The Odour Best Management Practices are detailed in the Odour Management Plan Report found in Appendix D of the ESR.</p>
24			Site Operations/Groundwater	<p>I also have concerns regarding the impacts to surface water, groundwater and hydrogeology. The summary noted existed mitigations are sufficient, but that a large aquifer also exists below the site. The proponent has not done a sufficient job communicating how it</p>	<p>According to the ECA, the landfill is permitted to receive only solid non-hazardous ICI waste, including contaminated soils, and processed organic waste (e.g., dewatered sewage sludge from the Caledonia Sewage Treatment Plant).</p>

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				treats leachate. The summary report notes a larger area will now flow into the treatment pond and additional planting will be used to support existing surface water conditions. There has also been no information provided on the type of waste the facility is taking and potential health risks - for example, is there potential for the waste to contain PFAS or PFOA particulates? And are the existing management measures sufficient to stop this leeching into groundwater supplies?	The MECP has set standards for landfill liners and collection and treatment of leachate. Leachate or contact water is contained within the landfill cell footprint and is either hauled out of the landfill by truck (and discharged at an approved wastewater treatment plant receiver) or treated in the on-site leachate treatment system. BRE is required to meet groundwater quality standards for the entire site at the site property boundary.
25			Site Operations	BRE also has a history of non-Compliance regarding leachate levels. MECP issued an order for the company to remove leachate level is at or below 196.75 metres. The order was meant to be rectified by March 12, 2020 and is now past due. The residents surrounding the dump should not have to monitor the actions of the BRE.	Comment noted.
26			Site Operations	The proponent has also failed to put the daily cover on which was a commitment made to the community. This resulted in garbage blowing to the north side of the fence and affects our visual amenity of the area.	Comment noted.
27			Site Operations	There have also been instances where the proponent has impacted private property while carrying out works on the site with no rectification undertaken until the landowner raised the issue, this included bulldozing landfill into a farmer's field. Is this the approach taken toward environmental management?	Landfilling of waste is restricted to the existing waste site and within the original property boundary. The rail lands to the north are currently used for stockpiling of clean soil during construction, filling, and closure activities at the Site.
28			Paving the on-site road	2017 Ministry of BRE Landfill site Vertical Environment Assessment the dump promised to pave the inside of the dump entry. We visited the dump in October 23, 2023 and it has not been paved. Another example that proponent does not carry out management measures as promised.	Road is scheduled for paving in 2024.
29			Site Operations	We also have concerns about the general conditions of the site where critical infrastructure is not maintained to appropriate standards, thus increasing the likelihood of an incident. The Leachate Digester has an outlet pipe which is held up by bracing with 5 gallon plastic pails 5, which exits into an underground tank. When we went to look take a closer look, we were told to get back as the smell would be dangerous. The Febreze mister pipe was being held up by sticks, that a strong wind storm would blow down. The febreze is just one more chemical smell to cover up the methane.	Comment noted.
30			Site Operations/Leachate	With the amount of rain we have had this year the pump would be running 24-7 in order to keep up, not just 5 days a week. This again contributes to concerns I have about how overflow of the treatment pond will be managed, especially as climate change means more frequent adverse weather events including heavy rainfall and flooding.	Leachate or contact water is contained within the landfill cell footprint and is either hauled out of the landfill by truck (and discharged at an approved wastewater treatment plant receiver) or treated in the on-site leachate treatment system. The Site is graded to convey clean stormwater away from active landfilling areas to reduce leachate generation. Clean stormwater is conveyed to on-Site internal perimeter ditching that directs collected stormwater to the existing stormwater management (SWM) pond. Site grading, ditching, and the SWM pond have been designed to manage storms up to and including the 100-year storm, noting that the stormwater management pond performance allows sufficient capacity for multiple storm events. Modelling

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					of the 100-year storm event indicates that approximately 0.44 metres of vertical capacity will remain in the SWM pond prior to overflow conditions occurring.
31			Site Operations	Where they test the level of the leachate at the pipe it was all over grown with grass at least 2 ½ feet high. Another example of basic maintenance not being undertaken around the site.	Comment noted.
32			Transparency	During a scheduled tour, we asked to visit the northeast corner of the of the dump to see if they had the proper ditching. We were told we were unable to visit that section of the site for safety reasons and the tour abruptly ended. This again raises concerns that BRE are not being transparent with the community.	Comment noted.
33			Reporting	BRE says the water they are putting into the ditch is safe and not contaminated, but there is no ongoing communication to residents about monthly reporting figures, any incidents or issues.	Operations and Monitoring Reports are available to view on BRE website (Documents br-environmental (brenvironmental.com))
34				The Stoney Creek dump is presently having trouble with environment due to foul smells of methane. The Hamilton Wentworth District School Board has complained from families for health issues from their children. I spoke to one of the parents that go to the school and she was just livid. Similar to BRE, they are looking to expand this dump as well. The Tom Howe dump in Hagersville was closed in 2015 but still gives off toxic gas from it's pipes or stacks.	Comment noted.
35			Traffic and road maintenance	The number of heavy vehicles which travel to and from the dump, have also damaged the local road. While trucks are not mean to access or exit the site via McFarlane Road, they do on numerous occasions. The road is not built to support the weight of large trucks and their constant use has led to deterioration of the road. How does the dump plan to manage the transport impacts? The report says there are no transport impacts. How is this possible?	The state of Brooks Road with respect to potholes is a Township issue and should be dealt with by the Township when they review their road network and decide which roads need improvements. As Brooks Road is used by trucks to access the BRE landfill, it should be designated as a truck route and should therefore include a pavement structure that can accommodate heavy truck traffic. Truck traffic is not set to increase because there is no change to the annual fill rate limits with the proposed expansion. The project is proposing to increase the capacity of the landfill to be operational for approximately two additional years. GHD completed one weekday and one Saturday count at the site driveway and at Hwy 3 to get the a.m., mid-day, and p.m. peak hour turning movement counts and observed what routes the vehicles took. At the time of the count, there was actually had more traffic to/from the site than usual due to some transfer of clean clay to another property which resulted in an additional 75 loads throughout both days. BRE is not required to maintain Brooks Road, this is the responsibility of the Township of Cayuga.
36			Social Benefits	The social impact of the dump is probably one of the greatest concerns. Nearby residents have to put up with the smell, change their plans or activities based on how strong the smell is on a given day and waste time ensuring compliance. The summary report notes the dump contributes to the local economy through jobs. How many jobs? And what about benefits to nearby residents? Across the world, projects are acknowledging that communities most impacted by these types of activities should also benefit from their presence.	BRE employs a combination of people who reside within the boundary of Haldimand County and adjacent municipalities. BRE provides a positive economic impact by: <ul style="list-style-type: none"> • accepting waste material from Haldimand's Operation department; • Payments associated with hauling treated effluent to Haldimand's waste water treatment plant;

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					<ul style="list-style-type: none"> Sourcing fuel, potable water, equipment, materials, and many on-going services to companies located in Haldimand County and the adjacent areas; Donating clay material to assist 6 Nations with the material needed for final cover installation to allow their landfill to meet closure requirements. <p>BRE would be willing to restart a program that would provide to support to the broad community programs such as the food bank or community related projects that benefit the entire community. BRE would be pleased to support local sports teams through jerseys, sponsoring which provides wide benefits to the whole community .</p>
37			Social Benefits	<p>There is another dump that two reserves split Oneida Nations and Chippewas on the Thames are both compensated through a community benefit agreement. They split 4 percent of the gross revenue and \$4 per tonne from the landfill. The two communities split \$1,000,000 a year from the people who owns the dump. What community benefit program are they proposing for the residents nearby to mitigate the long-term impacts from the dump?</p>	<p>BRE employs a combination of people who reside within the boundary of Haldimand County and adjacent municipalities.</p> <p>BRE provides a positive economic impact by:</p> <ul style="list-style-type: none"> accepting waste material from Haldimand's Operation department; Payments associated with hauling treated effluent to Haldimand's waste water treatment plant; Sourcing fuel, potable water, equipment, materials, and many on-going services to companies located in Haldimand County and the adjacent areas; Donating clay material to assist 6 Nations with the material needed for final cover installation to allow their landfill to meet closure requirements. <p>BRE would be willing to restart a program that would provide to support to the broad community programs such as the food bank or community related projects that benefit the entire community. BRE would be pleased to support local sports teams through jerseys, sponsoring which provides wide benefits to the whole community .</p>
38			Northern Rail Road	<p>The property along the north railway line is being used right now as a buffer zone and a place to store the clay to put on the existing landfill for a daily cover. Where will the buffer zone be?</p> <p>In 2014 Dave Bruce went to a council meeting June 17,2014 where the BRE wanted to amend the Designation of the official plan and zoning by-law 1H86 of the subject property to facilitate the extension of the northern rail line to act as an additional buffer zone and temporary storage of clean clay relocation of groundwater monitoring wells. It has been assured by the proponent that there will be no land filling on the added lands and no change to existing waste footprint of the land site will take place. The BRE want the extension of the rail line to expand</p>	<p>The assurances made at the time of the zoning change are correct. Landfilling of waste is designated for the existing waste site and within the original property boundary. Waste placement will not occur on the rail land property. The rail lands continue to be used as a buffer zone.</p>

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				the dump. We cannot believe anything they say. They are not held accountable to any commitments they make.	
39			Visual Screening	The outside of the landfill is disgraceful, garbage everywhere, and carcasses of dead animals. BRE has also committed to planting vegetation eg. Trees & shrubs along the berm but this has not yet taken place. Will this be the same approach they take to measures proposed to mitigate impacts to the expansion?	The landfill is screened along the western property boundary by a vegetated screening berm constructed to an elevation of approximately 203 to 204 metres above mean sea level (m AMSL), approximately 5 to 6 m higher than the Brooks Road approximate elevation of 198 m AMSL. A fence with a privacy screen has been installed on top of the western screening berm, increasing the visual barrier to an elevation of approximately 205 to 206 m AMSL (almost 8 m higher than Brooks Road).
40			ESR	The new BRE Environmental Landfill Expansion Screening Report is 2,617 pages. BRE did very little to help the community understand what the report meant, likely project impacts and the proposed mitigations. The summary report provided was very high-level, contained a lot of jargon and essentially said, there are no impacts to anything. We have outlined our complaints in the above and do not want to police the Brooks Road Landfill Expansion Environmental Screening to the north railway line. Little by little, the site keeps expanding and keeps encroaching on our way of life. Our community takes the garbage from all over Ontario but receives no benefit from BRE, despite the profits they take in. The information we have been provided is not sufficient for us to understand the impacts and how they will be managed. We do not support the approval of the expansion of the dump and believe it will have negative environmental and social impacts on the surrounding area.	The Environmental Screening Report itself is a 120-page document that provides a summary of technical studies undertaken for the project. The appendices include technical reports to support the results and findings of the studies. BRE conducted two Public Open Houses to provide information regarding the project in a simplified format including display boards with figures and key points.
41	February 1, 2024	Email	Petitions	Please find attached names and phone numbers of local residents that do not wish the Brooks Road Landfill to expand, in other words they are objecting to the expansion!	Comment noted

This a protest from Haldimand County Residents against the Brooks Road Landfill Capacity Expansion. Presently the Brooks Landfill is at 100,000 cubic metres and they want to increase it to 219,400 cubic metres. The information that received at the on going PLC meetings that the dump should have been filled to capacity roughly by the past June or end of this year.

Mary Pearson 905-520-2232

Star Lane 289-684-7956

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289-370-0228

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W.C. Galt 905 772 5577

Bev. Bassindale 519 420 7250

Lena Williams 905 776 2438

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Jane Armstrong 905-772-3797

Beverly Redue 905-772-3387

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Ruby McWilliam 905 768 8520

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Eleanor Bell 289-736-0077

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