

Reference: Taggart-Miller Environmental Services proposed Capital Region Resource Centre (CRRRC) – Project Reference # 10261

## INTRODUCTION

I am a resident of the village of Embrun, in the Township of Russell, and I live about 7 km from the centre of the proposed Capital Region Resource Recovery Centre (CRRRC), North Russell Site. This email is to provide my comments on the Proposed Terms of Reference (TOR) for the Environmental Assessment (EA) for this project (<http://www.crrrc.ca/whatsnew.htm>).

My specific comments are noted below but I have some general comments to make by way of introduction. Though I am a scientist by academic background, BSc (Physics and Mathematics), I found the TOR difficult to evaluate often due to its lack of specific information. In addition, Taggart-Miller Environmental Services (TMES) has not provided a complete and public explanation of each of the items in the terms of reference, especially noting the very tight timelines (14 September to 15 October) to provide comments. This precludes complete and meaningful personal and public comments on the TOR.

Please note that I live about 235m from one of the creeks that are proposed to dump the processed leachate effluent, the mouth of the creek is at the Castor River (45.271403N / 75.261330W, elevation 61m). In addition I live 7 km directly downwind of the prevailing wind, from the North Russell site. I am concerned the TOR does not provide a reasonable evaluation or consequential mitigation of the risk to me and my family created by this project.

I will provide general comments on Volume 1 of the TOR and Appendix C to Volume 1. I have not had to review the remaining approximately 5000 pages of Volumes 2 and 3 (with supporting appendices) of the TOR.

## REVIEW AND COMMENTS

### Volume 1

Section 1.2 (Page 1) – This is a general statement of government policy but it does not tell us if or how CRRRC will improve on the current performance of the numerous existing similar sites in eastern Ontario. This must be noted to ensure the EA and any strategies to remediate any negative effects contributes to the Provincial objectives.

Section 2.5 (Page 6) – TMES states any changes to the EA in the future may be subject to public consultation. Public consultation should be an ongoing requirement and TMES should be obliged to consult the public on any changes to the EA.

Section 4.2.1 (Page 9) – TMES notes here that “in the absence of new provincial regulation” diversion of IC&I and C&D waste is voluntary. Provincial regulations should be made to provide direction to TMES and others in developing such sites as the CRRRC.

Sections 4.2.2 (Page 11) – The statistics here on per capita waste are not justified in the TOR. Especially the comment that per capita waste will increase due to population increases is not

justified. There is no comment on any analysis of the effects of another “diversion” site on the existing sites and what will CRRRC do to increase diversion that is not happening now. If the CRRRC does not increase diversion rates it is nothing more than another landfill site. In addition the TOR does not mention what increased diversion rates are targeted. These targets must be available, justified, and reviewable to ensure the EA is meaningful.

Section 5.0 (Page 15) – The TOR states that the CRRRC site should be rectangular or square but the proposed North Russell Site certainly does not fulfill this criteria, unless the CRRRC is developed primarily in the existing quarry. An explanation of why the existing site configuration is acceptable is needed here.

Section 5.0 (Page 16) – TMES has not identified an unsatisfied market for material that is potentially divertible. TMES only states that it will produce divertible material. In the absence of an unsatisfied market then this material will be land filled on the site and the TOR is only for a land fill site, not a diversion site. This unsatisfied market must be identified in the TOR to provide a complete EA. I note especially that TMES does not note all the landfill and diversion sites that service the “Proposed Service Area,” (see figure 3-1) and evaluate the products of these projects and compare the outputs of all these sites with the unsatisfied market demand. If TMES simply wants to enter and compete for market share in an existing satisfied market then we need not take the additional risk of another land fill site. In addition, as no new market is identified here then the result will not increase diversion just simply spread around the waste into yet another land fill site.

Section 5.1 (Page 21) – This section states that TMES will focus on diversion through recycling and “other processes”. These other processes are not completely identified and TMES states that things beyond its control, the market for diverted material, government regulation, and preferential rates for renewable energy, will affect diversion. In other words, if things don’t work out, then be aware that the TOR is for a land fill site not a diversion site. The EA must be for a viable diversion site and the unsatisfied market for diverted material, including energy, must be identified in the TOR.

Section 6.0 (Page 22) – TMES does not identify how markets for divertible material will be developed. Again, if no market exists this is simply another land fill site. If other sites for some material, e.g.: petroleum or metal contaminates soils, and are licensed for this (Lafèche-Leblanc), why do we need a CRRRC site? This seems to be an admission that there is no unsatisfied market for these types of diverted materials. If there is an unsatisfied market why is there no appropriate license application noted in the TOR?

Section 6.0 (Page 24) – There is mention of gas being sent to an on-site flare. There is no mention of the products of this flare combustion and no mention of a potential downwind hazard. These flare combustion products should be linked to the work plan for the site and the EA should expand beyond the currently proposed EA work radius (see Appendix C, Section 4.3.1, Page C-1.1 page 4).

Section 6.0 (Page 25) – This section mentions “stabilized organics” but does not identify a market for this product. This market should be identified or the result could be the CRRRC becomes a simple landfill site. In addition what “other organics processing technologies” are proposed and

what is the market for the product of these technologies. This unsatisfied market must be identified.

Section 7.1 (Page 26) – The area of “more detailed studies” needs to be defined especially in light of the use of a flare for biogas.

Section 7.1 (Page 27) – As noted above I live near one of the creeks intended to dump the processed leachate effluents. The area of the surface water environmental evaluation should cover the length of this creek, and other such creeks, and not be confined to the immediate area of the proposed site.

Section 8.0 (Page 34) – This section states the methodology to be used in the work plans will be detailed only when a “preferred site” is selected. The TOR should be the revised and the public again consulted once the detailed plans are completed. Commenting on this draft is insufficient.

Section 8.2.3 (Page 38) – Again I reiterate that constraining the EA study to 500m of the outside edge of the site boundaries is insufficient. The study must cover, as a minimum, the length of the leachate effluent discharge creeks and an area of perhaps 500m either side of these creeks, the entire esker identified in the TOR, and a reasonable downwind area developed based on solid wind studies and the movement of flare gasses.

Section 8.3.4 (Pages 40 to 42) – The proposed haul routes do not include a possible new interchange with Highway 417. This would minimise the traffic (perhaps 100+ trucks per day), on existing municipal roads. This additional possibility must be added to the EA TOR.

Section 8.3.5 (Page 43) – The leachate effluent will be discharged into the local surface water system. The EA must cover the entire system of creeks that will carry this effluent. See my comments above.

Section 8.4.1 (Page 45) – When TMES develops the details of the storm water and leachate management plan are determined, at some later time, will TMES provide an opportunity for further public comment?

Section 12.1 a) (Page 61) – The area where TMES will provide Property Value Protection (PVP) is not defined except for the properties in immediate proximity to the site. This should be extended to all properties negatively affected by the project, downwind and along all surface and ground water routes.

#### Appendix C to Volume 1

C-1.2 Section 4.4 (Page C-1.2 page 6) – The public should have the opportunity to review the effluent discharge criteria prior to them being applied in the EA.

C-1.3 Section 3.1 (Page C-1.3 page 1) – The objective of the TMES noted assessment criteria is not to determine what potential environment damage may occur but simply to identify the best site. TMES presumes in these criteria that a site will go forward. This should not be. The criteria

should allow for the assessment to show that neither site is reasonable, and that the project should be abandoned.

C-1.5 Section 2.2 (Page C-1.5 page 1) – As noted previously the 500m distance is not reasonable. Effects will be felt along the effluent discharge creeks, downwind from the flare and along the esker for far greater distances. These distances must be determined and these used in the EA.

#### ADDITIONAL COMMENTS

In my life I have witnessed in person, and on the news, several fires in waste facilities. These include witnessing the Hagersville Tire Fire (1990), several fires in auto recycling facilities in east and south Ottawa in the last few years (including 2012). The effects of these unforecasted and unintended events must be considered and plans for mitigation of these effects must fall out of the EA. I am certain the current Township of Russell Fire Departments are unable to handle large industrial fires. I believe consideration must be given to TMES creating, manning, equipping, etc. an appropriate 24/7 on site industrial fire department.

#### SUMMARY

I believe the TOR for the CRRRC EA requires significant modification. There are numerous problems noted above but the key weak areas include:

1. The definition of what unsatisfied market exists for divertible materials, otherwise the CRRRC site is simply another landfill site; and
2. The expansion of the area covered by the EA to include the a reasonable downwind area affected by the proposed flare, the length of the effluent discharge creeks and the adjacent area out about 500m, and the entire length of the esker.

Thank you all for your attention to my comments on this proposed TOR for the CRRRC EA. I may be contacted for additional, more in-depth comments if required. I shall continue my reading on the remaining 5000+ pages of the TOR that I have not been able to read as of yet and I will forward my comments along as required.

Regards,

Charles Armstrong