

**Staff Comments on Terms of Reference for an Environmental Assessment of the  
Proposed Capital Region Resource Recovery Centre  
Taggart Miller Environmental Services (TM)  
October 2012**

Issue	Comment
1. Air Quality	<p>a) Both proposed sites lack baseline air quality data. The closest NAPS station is 35 km west. Using data exclusively from the west would underestimate levels, as slightly higher concentrations have been observed in the east due to the prevailing wind flow. In the absence of baseline air quality data, the proponent is advised to obtain such a data to estimate the total impact of their operations.</p> <p>b) The ToR does not go into detail as to what level of monitoring will be done, what parameters will be monitored, and for how long. It is advised that both air quality, as well as meteorological data be measured at the site to aid in the modelling work and assess the cumulative impacts of the proponent operations.</p> <p>c) The ToR needs a plan to prevent toxic soils from impacting air quality. Although the proponent proposes regulatory and impact monitoring in the Operation and Design plans, it is unclear if this monitoring will be continuous, intermittent or partial.</p> <p>d) The proponent also proposes bioremediation to treat soils contaminated with hydrocarbons. Monitoring of the volatile organic compounds and ground level ozone are recommended.</p> <p>e) Higher levels of ground level ozone have been observed in the east area than in the west. The bioremediation plans need to take this into account, as some types of vegetation would contribute to the formation of ozone.</p> <p>f) Drywall recovery has air quality impacts that also need to be addressed by the proponent.</p> <p>g) Finally, a recommendation to calculate the benefits in terms of greenhouse gas (GHG) from diversion would help the City in its GHG inventory and demonstrate the importance of this proposal.</p> <p>The following comments relate specifically to the Boundary Road option.</p> <p>h) Truck haul routes should include the best route that would reduce air quality impacts on residents.</p> <p>i) In their Design and Operations Report, we would strongly advise that</p>

	<p>they undertake GHG emission modeling for the proposed LFG generation. It should show the various planned scales of operation. GHG compliance monitoring should also be ongoing in their LFG to energy as well as reporting to the Province/Federal Government. The LFG component will need to comply with O. Reg. 452/09.</p> <p>j) What are the impacts on Ottawa's level of GHG?</p> <p>k) Where is the detailed Air Quality work plan - it's vague compared to the others.</p>
2. Transportation	<p>a) Are the rural roads serving the Ottawa site unpaved? Would the new road being proposed for the North Russell site be paved?</p>
3. Leachate	<p>Based on a review of the Proposed Terms of Reference for Environmental Assessment of the Proposed Capital Region Resource Recovery Centre, the City of Ottawa Sewer Use Program (SUP) has comments regarding the possible treatment and disposal of the landfill site leachate at the City's Robert O. Pickard Environmental Centre (ROPEC).</p> <p><u>Boundary Road Landfill Location:</u></p> <p>a) For the potential discharge of leachate to the City's ROPEC, Taggart Miller will be required to consult with SUP staff and Wastewater Department staff to determine the feasibility of discharging leachate to the City's ROPEC. This would apply for either the primary or as the contingency disposal method.</p> <p>b) For any potential discharge of leachate to the City's ROPEC, leachate treatment methods would require consultation with SUP staff and Wastewater Department staff.</p> <p>c) Any treated leachate that is discharged to the City's ROPEC must have a Leachate Discharge Agreement and the treated leachate must be in compliance with the by-law discharge limits.</p> <p>d) The General Manager of Environmental Services would make the final decision to accept treated leachate in the City's ROPEC.</p> <p><u>Russell Township Landfill Location:</u></p> <p>e) No actions would be required since the City would not be required to receive any treated leachate for disposal to the ROPEC. However, The General Manager of Environmental Services would make the final decision to accept treated leachate in the City's ROPEC.</p>
4. Surface Water	<p>a) Appendix C – Surface Water Work Plan – North Russell Road Site (and Boundary Road Site) – Section 3.2 Approach and Work Plan:</p>

	<p>“The following tasks will be undertaken to obtain and review the published information and complete the preliminary investigations/assessments for the North Russell Road Site: Surface water flow and water quality monitoring stations”.</p> <p>It is not clear whether they intend to establish new monitoring stations, or whether they plan to rely on data from existing monitoring stations.</p> <p>b) Appendix C – Surface Water Work Plan – North Russell Road Site (and Boundary Road Site) – Section 4.1 Task 1: Complete Assessment of Existing Environment.</p> <p>There is no indication of the frequency of the surface water quality tests that they plan to do. Will tests only be done once, or will they be done monthly or on some other schedule?</p>
5. Stormwater	<p>The Stormwater Management Section/Surface Water Management Services Branch reviewed the Term of Reference for the Environmental Assessment of the proposed Capital Region Resource Recovery Centre and do not have any comments regarding the Surface Water Component Assessment Criteria.</p>
6. Natural Environment	<p>We have reviewed the terms of reference for the natural environment, specifically Appendix C-2.4 Biology Work Plan and Volume 1 of the ToR. From a natural environment perspective, we don't have any comments on their work plan as they have outlined it.</p>
7. Drainage	<p>a) The Simpson Municipal Drain transects the proposed site from west to east. Due to its status under the <i>Drainage Act</i>, any changes to the drain itself or the drainage area will require an update to the Engineer's Report, pursuant to Section 78 of the Act.</p> <p>b) If the drain and drainage area are not altered in any way, then nothing is required by the owner other than to provide a working space along one side of the drain for future maintenance.</p> <p>c) The Engineer's Report for the Simpson Municipal Drain specifies that any excavated material is to be spread at least 8 feet back from the top of bank along the drain to a depth of no greater than six inches. In this case, the material would be spread to whatever width is required, based on that depth. The landowner may also choose to have the material removed from the site at their cost. In this case, a minimum working easement of 15 m would be required.</p>
8. Approvals	<p>We have reviewed the 'Other Approvals' Section within Volume 1 of the Term of Reference for the Taggart Millar ICI, and C &amp; D sites EA and note the following:</p> <p>a) They indicate that they will apply for the Planning Approvals after the</p>

	<p>completion of the EA process and that the same reports could be used. In order to ensure issues are adequately addressed to the satisfaction of the City's Official Plan, they really should have a pre-consultation with staff prior to the initiating the EA itself. The Pre-Application Process is mandatory for Official Plan and zonings. The scope and range of studies required would occur at that time. If nothing else, they need to be aware that they MUST pre-consult on the planning applications.</p> <p>b) In addition, they do not indicate a site plan requirement. If this is like other C&amp;D or transfer facilities, there are typically buildings that generate the requirement for site plan control. Again, a pre-consult is required.</p> <p>c) From the scope of the traffic assessments they are looking at, they seem to make assumptions that the trucks will all be using the 417. That is unlikely the case and needs to be more fully examined as some of the more direct truck routes from Orleans or Riverside South, for example, do not involve the 417.</p> <p>d) South Nation permits would be required and potentially their DFO approvals.</p>
9. Waste Projections	<p><u>Terms of Reference (Volume 1):</u></p> <p>a) Page 11 states:</p> <p><i>“The current transfer of approximately 200,000 tonnes of Ottawa area IC&amp;I waste for disposal elsewhere reflects the current diversion and disposal deficit in the proposed service area. It is believed that waste from the Capital Region is currently exported to privately owned facilities New York State, as well as in the Gatineau, Quebec area. The current deficit in availability of facilities to manage IC&amp;I and C&amp;D waste in the service area is also demonstrated by the transfer of waste from the Kingston and Belleville areas for disposal in New York State.”</i></p> <p>Materials are generally transferred out of Ottawa (and assumed disposed of) due primarily to economics and not the lack of local disposal capacity.</p> <p><u>Volume 3 Supporting Document #1:</u></p> <p>b) Nowhere in the Terms of Reference does it indicate that Taggart Miller have commissioned any studies to quantify the amount of waste generated or diverted in Ottawa or eastern Ontario themselves. Rather, Taggart Miller is relying solely on publicly available third-party waste generation data as the basis for justifying their undertaking. This reliance is of concern to the City of Ottawa, given that assumptions behind some of the calculations are not known by Taggart Miller and the fact that some of the data is outdated.</p>

	<p>c) Based on a study carried out as part of Phase 1 of the Waste Plan, the amount of projected waste to be handled by the proposal is felt to be grossly overestimated (in the order of 25%):</p> <ul style="list-style-type: none"> <li>i. Section 3.1.1, page 6 - an allowance for waste transferred outside of Ottawa was already made by the City when calculating the volume of IC&amp;I and C&amp;D waste managed by the private sector (and quoted on page 6 as being 560,000 tonnes, per City of Ottawa, 2011). Therefore, the 200,000 additional tonnes that assumed to be generated in Ottawa and transferred out is in our opinion high.</li> <li>ii. Please indicate if the 200,000 tonnes transferred through the BFI transfer station in 2010 and 2011 includes residential waste generated by City residents or whether it is purely IC&amp;I and C&amp;D tonnage?</li> <li>iii. Section 3.1.1, page 6 – the diversion rate used (14%) was initially calculated by the City of Ottawa during a 2007 study. This rate was calculated for the year 2005 and updated calculations have since been done (2011) that indicate a (low baseline) diversion rate of 19% is more appropriate for IC&amp;I and C&amp;D waste generated in Ottawa. Please update waste projections using a baseline waste diversion rate of 19%.</li> <li>iv. Can you explain why the waste diversion rate was held constant throughout the 35 year assessment period when calculating future disposal requirements, when it seems reasonable to expect at least some increased waste diversion over this timeframe?</li> <li>v. There is a vast discrepancy (32%) in the projected waste generation rates in the City of Ottawa (833kg/person/year) and the Ontario-wide rate (567kg/person/year). Can you please provide an explanation as to this significant difference?</li> </ul>
10. Public Health	<p>We have reviewed the Terms of Reference for the Capital Region Resource Recovery Centre (CRRRC) and have no specific comments to make on this document.</p> <p>Ottawa Public Health would like to remain informed about the project and receive a copy of the Draft EA document once it is completed in 2013.</p>
11. Legal	
12. Solid Waste	<p>a) There is no relationship between the proposed waste diversion facilities at the site and the proposed landfill capacity. Clarification is required on the tonnage of waste anticipated to enter the CRRRC, the capacity of each of the diversion facilities at the site, the anticipated diversion rate away from landfill and the ultimate tonnage of residuals to be landfilled or beneficially used at the landfill. The City requires a clear distinction from Taggart Miller</p>

	<p>between incoming materials to the CRRRC, materials to be diverted off site for reuse and recycling, materials to be beneficially reused at the site and materials to be landfilled or disposed of.</p> <p>b) Taggart Miller's ToR relies heavily on future changes in provincial waste policy to drive diversion rates up. The City feels that the ToR should emphasize waste diversion at the CRRRC and that landfill capacity should be based on post-diversion tonnages at the CRRRC waste diversion facilities. Clear diversion targets should be established by Taggart Miller. Landfill capacity should be determined based on these established diversion targets only.</p> <p>c) Staff wish to make sure that there is appropriate public consultation on identification of the preferred site and on configuration of the facility on the preferred site.</p> <p>d) There is inadequate backup for the projected tonnage of contaminated soils requiring processing and where these soils are to come from. The City does not agree that treated contaminated soils should be used as daily cover (i.e. landfilled).</p> <p>e) It is not clear in the ToR if all waste management facility components will be included in the EA, or just the landfill footprint.</p> <p>f) It is not clear in the ToR how the assessment of alternative methods will be carried out.</p> <p>g) Minimization of landfilling is important to the City. Therefore, thermal technologies should to be evaluated in to the EA and considered as "alternatives to the undertaking".</p> <p>h) The proposed impact zone for the effect analysis is limited to 500 metres. In many cases, impacts are felt beyond the 500m zone. As such, the net effects analysis should be expanded to 3 km around the sites.</p> <p>i) There does not appear to be any visual impact assessment included in work programs. This is extremely important to the City, since the Boundary Road Site is located adjacent to a 400 series highway that is a gateway into the City of Ottawa.</p> <p>j) The service area for the proposed waste diversion facilities and contaminated soil treatment should be the same as the landfill to prevent residuals from other municipalities being landfilled in the City of Ottawa.</p>
13. General Comments	<p>a) In ToR, define 'waste' species (very odd language – what does this mean?)</p> <p>b) Conservation Authority will take care of the water protection aspect. We would note that based on the existing uses in the area that the proposed site (Boundary Rd. option) is already allocated adjacent to brownfields (car disposal sites etc.) and would have been impacted (hydrocarbons (oils) etc.).</p>