

December 19, 2016

City sends comments to Ministry, requests written response from company re: proposed landfill

The City of Campbell River has requested written responses from Upland Excavating on technical comments and questions related to a proposed expansion of landfill operations by the company.

City Council has reviewed and endorsed a letter to the company, which will be copied to the Province, containing 58 comments and questions on the final technical reports prepared for the company's public engagement process for expanded landfill operations at 7295/7311 Gold River Highway.

"The City of Campbell River recognizes the need for a local solution to the local waste stream, including contaminated soil and asbestos. At the same time, any proposed facility has the potential to have environmental impacts of concern, and the City wants certainty that every precaution has been considered to safeguard the community's drinking watershed as well as the Quinsam River, Cold Creek and other environmental systems," says City manager Deborah Sargent. *"The Province's review of the company's application for a new operational certificate at the landfill is part of a separate process, so the City is copying the letter to the Ministry of Environment to ensure they are aware of the City's concerns."*

The comments and questions in the letter relate to:

- baseline measures of waste already in the landfill
- baseline water quality, groundwater flow and plans to protect human health and freshwater aquatic life, including leachate treatment/runoff/spill prevention and keeping dust-borne contaminants from entering waterways
- plans to reduce greenhouse gas emissions and how landfill gas generation levels could affect meeting community energy and emissions targets
- how open burning of non-treated material could affect air quality fine particulate levels
- the ability of the landfill liner to withstand storage of hydrocarbons
- whether chromated copper arsenate-treated wood and aquaculture-related waste would be accepted at the proposed landfill
- long-term site monitoring and maintenance of records, even after landfill closure

"The City appreciates the detailed responses by the company to questions submitted in March as part of a stakeholder consultation process. These answers appear in the summary report along with the answers to the other stakeholder concerns and resulted in a number of changes and clarifications to the final technical reports," says Ron Neufeld, deputy City manager and general manager of operations. *"Staff met with Upland and their consultant in November, and the company has acknowledged that further discussion will occur on the development permit requirement subsequent to making an application under the Provincial Waste Discharge Regulation. Also, it is our understanding that the company will present a work plan to the Ministry for completing additional rationale on the application of the appropriate water quality guidelines, the connection between Mclvor and Rico Lakes, additional seasonal data, defining the watershed divide and additional information on characteristics of the surrounding bedrock."*

The proposed facility would take land clearing debris, inert construction material and demolition waste as well as non-hazardous contaminated soil and asbestos and requires the design and construction of a lined landfill and leachate treatment system. The proposed capacity is approximately 506,000 cubic metres of waste to be deposited over 20 years with an estimated annual average of 32,890 tonnes. The company has indicated that they have no formal plans for expansion beyond the current proposal.

Once the Ministry is satisfied with the applicant's technical information, they would issue a draft operational certificate, which would be posted for public and City comment. Should the proposal proceed, the development would trigger the City of Campbell River's Watershed Development Permit process and the submission of an Environmental Impact Assessment report on risks and the cumulative effects of the landfill.

The Final Technical Reports were made available to the public as part of Upland's second community engagement process.

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