



Ministry of the Environment
Ministère de l'Environnement

Ontario

Provincial Officer's Order

Environmental Protection Act, R.S.O. 1990, c.E 19 (EPA)
Ontario Water Resources Act, R.S.O. 1990, c. O. 40 (OWRA)
Pesticides Act, R.S.O. 1990, c. P11 (PA)
Safe Drinking Water Act, S.O. 2002, c.32 (SDWA)
Nutrient Management Act, 2002, S.O. 2002, c.4

Order Number
5830-6Z2PPW

Incident Report No.
5485-6MQH8S

To: Waste Management of Canada Corporation
2301 Carp Road, RR 3
Carp, Ontario, K0A 1L0
Canada

Site: 2301 Carp Road
Ottawa

Pursuant to my authority under EPA Section 157.1, EPA Section 196(1) and EPA Section 157, I order you to do the following:

Work Ordered

Item No. 1	Compliance Date	2007/05/18
<u>Summary Actions Report</u>		

1. By no later than **June 1, 2007**, prepare and submit to the issuing Provincial Officer a Summary Actions Report which outlines a description of all measures that have been taken since **February 01, 2007**, and the date those measures were taken to address odour discharges from the Waste Management of Canada Corporation Landfill Site located at 2301 Carp Road in Ottawa ("WMCC Landfill Site").

Retain Qualified Person

2. By no later than **May 17, 2007**, retain the services of qualified consultant(s) or contractor(s) with experience and expertise in landfill gas emissions/control measures ("Qualified Person") to carry out the activities described in items 3 to 7 (inclusive) below. Submit written confirmation of the name of the consultant or contractor to the issuing Provincial Officer by no later than **May 21, 2007**.

Odour Sources Survey Report

3. By no later than **June 29, 2007**, submit to the issuing Provincial Officer an Odour Sources Survey Report with respect to the WMCC Landfill Site. The report shall be prepared by the Qualified Person as a result of the Qualified Person evaluating all potential sources of odour at the WMCC Landfill Site that may be discharged to the natural environment and which cause or

are likely to cause adverse effects and shall include but not necessarily be limited to:

- a) a description and ranking of the odour sources;
- b) a description of recommended measures to achieve and maintain compliance with Section 14 of the Environmental Protection Act with respect to each source of odour discharges.

Emissions Survey Report

4. By no later than the last business day of each of June, August, October, and December, 2007 submit to the issuing Provincial Officer an Emissions Survey Report with respect to the WMCC Landfill Site. Each report shall be prepared by the Qualified Person as a result of the Qualified Person having conducted a separate landfill gas emission survey at the WMCC Landfill Site in accordance with the U.S. EPA method for operational standards for emissions from landfill sites. The report shall include but not necessarily be limited to providing the results of the landfill gas emission survey for the previous month and describing any actions taken in the previous month with respect to the landfill gas collection and flaring system as a result of the survey.

Ambient Air Monitoring Report

5. By no later than **August 31, 2007**, submit to the issuing Provincial Officer an Ambient Air Monitoring Report with respect to the WMCC Landfill Site. The report shall be prepared by the Qualified Person as a result of the Qualified Person having conducted the ambient air quality monitoring, testing and reporting set out in the Ambient Air Quality Work Plan as identified in the February 16, 2007 letter prepared by RWDI AIR Inc. and attached to this Order as Appendix I, with the amendment that the monitoring and testing be completed such that the final report outlined in the 2nd paragraph on page 5 of the Plan is issued and submitted to the issuing Provincial Officer by August 31, 2007. Make all efforts to notify the issuing Provincial Officer, or if the officer is not available, Paul Kehoe, the Area Supervisor of the Ottawa District Office of the Ministry of the Environment, at least 24 hours prior to each sampling event.

Continuous Monitoring Report

6. By no later than **August 31, 2007**, submit to the issuing Provincial Officer a Continuous Monitoring Report prepared by the Qualified Person that assesses options and the potential effectiveness of installing continuous ambient air quality monitoring equipment that is capable of monitoring odour and/or odour causing compounds at the point or points of impingement at the WMCC Landfill Site. The assessment shall include, but not necessarily be limited to, identifying the various types of equipment available, the contaminants to be assessed, the proposed method detection limits, and the suitability of using continuous monitoring equipment at the WMCC landfill site.

Landfill Cover Report

7. By no later than **June 29, 2007**, submit to the issuing Provincial Officer a Landfill Cover Report with respect to the WMCC Landfill Site. The report shall be prepared by the Qualified Person as a result of the Qualified Person re-evaluating the adequacy of the current landfill cover and shall include but not necessarily be limited to outlining a summary of the findings of the

evaluation and providing recommendations as to measures that should be taken with respect to landfill cover at the WMCC Landfill Site to achieve and/or maintain compliance with Section 14 of the Environmental Protection Act with respect to odour discharges.

Operations Manual

8. a) By no later than **June 1, 2007**, prepare a Manual which includes plans, specifications and a description of the operations and maintenance procedures for the landfill gas system collection and air injection systems at the WMCC Landfill Site, including but not necessarily limited to:

- i) Phasing/timing of system installation, start up and operation - particularly with respect to integration with overall landfill operation and maximizing landfill gas control;
- ii) Inspection frequencies and maintenance/replacement procedures for system equipment;
- iii) Monitoring of landfill gas flow rates and concentrations;
- iv) Contingency provisions in the event of unexpected component failures.
- v) List of recommended procedures that are to be taken to minimize the discharge of odour and to address any resulting adverse effects from the discharge of odour during the disposal of gas well water and during the construction, installation, repair, maintenance of any landfill gas system components including but not limited to landfill gas wells, landfill gas well pumps, trenches and headers

b) By no later than **June 1, 2007**, submit written confirmation to the issuing Provincial Officer that you have prepared the manual.

c) Once the manual is prepared, operate and maintain the landfill gas collection system in accordance with procedures set out in the manual.

d) Keep a copy of the manual on the Site and maintain and update the manual as necessary.

Monthly Progress Reports

9. Commencing no later than **June 15, 2007** and on or before the 15th day of each month thereafter until December 31, 2007, prepare and submit to the issuing Provincial Officer a Monthly Progress Report on the status of all measures that have been taken during the preceding month and an identification of those measures which are planned to be undertaken in the next month to address the adverse effects that are being caused or are likely to be caused as a result of the discharge of odours from the WMCC Landfill Site.

Contingency Work Plan

10. By **August 01, 2007**, prepare and submit to the issuing Provincial Officer a Contingency Report which describes and evaluates potential contingency measures which could be implemented at the WMCC Landfill Site on and after September 30, 2007 to eliminate ongoing odour discharges from the Site that cause or are likely to cause adverse effects beyond those measures outlined in any of the reports outlined above. The Contingency Report shall include, but not necessarily be limited to, a description and evaluation of the possibility of ceasing the acceptance of waste at the WMCC Landfill Site and the capping of the Site with final cover in accordance with a revised closure plan.

Posting on WMCC website for Public Viewing

11. By no later than **May 18, 2007** post this Provincial Officer's Order and accompanying Provincial Officer's Report on the WMCC website by providing a link at <http://www.ottawalandfillea.com/>

12. By no later than **June 15, 2007** post the report submitted to the ministry required by Condition 1 of this Order on the WMCC website by providing a link at <http://www.ottawalandfillea.com/>

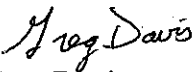
13. By no later than **September 14, 2007** post a summary of the results from the Ambient Air Quality Monitoring program as required by Item 5 of this Order on the WMCC website by providing a link at <http://www.ottawalandfillea.com/>.

14. Within **30 working days** after the end of each quarterly reporting period as identified in Condition 7 of Certificate of Approval 0741-6S9NPE, post the quarterly reports required by this condition on the WMCC website by providing a link at <http://www.ottawalandfillea.com/>

- A. While this Order is in effect, a copy or copies of this order shall be posted in a conspicuous place.
- B. While this Order is in effect, report in writing, to the District or Area office, any significant changes of operation, emission, ownership, tenancy or other legal status of the facility or operation.

This Order is being issued for the reasons set out in the annexed Provincial Officers Report which forms part of this Order.

Issued at Ottawa this 11th day of May, 2007.



Greg Davis

Badge No: 725

Ottawa District Office

Tel: (613) 521-3456 Ext. 227

APPEAL/REVIEW INFORMATION

REQUEST FOR REVIEW

You may request that this order be reviewed by the Director. Your request must be made in writing (or orally with written confirmation) within seven days of service of this order and sent by mail or fax to the Director at the address below. In the written request or written confirmation you must,

- specify the portions of this order that you wish to be reviewed;
- include any submissions to be considered by the Director with respect to issuance of the order to you or any other person and with respect to the contents of the order;
- apply for a stay of this order, if necessary; and provide an address for service by one of the following means:
 1. mail
 2. fax

The Director may confirm, alter or revoke this order. If this order is revoked by the Director, you will be notified in writing. If this order is confirmed or amended by order of the Director, the Director's order will be served upon you. The Director's order will include instructions for requiring a hearing before the Environmental Review Tribunal.

DEEMED CONFIRMATION OF THIS ORDER

If you do not receive oral or written notice of the Director's decision within seven days of receipt of your request, this order is deemed to be confirmed by order of the Director and deemed to be served upon you.

You may require a hearing before the Environmental Review Tribunal if, within 15 days of service of the confirming order deemed to have been made by the Director, you serve written notice of your appeal on the Environmental Review Tribunal and the Director. Your notice must state the portions of the order for which a hearing is required and the grounds on which you intend to rely at the hearing. Except by leave of the Environmental Review Tribunal, you are not entitled to appeal a portion of the order or to rely on grounds of appeal that are not stated in the notice requiring the hearing. Unless stayed by the Environmental Review Tribunal, the order is effective from the date of service.

Written notice requiring a hearing must be served personally or by mail upon:

The Secretary	and	Director (Provincial Officer Orders)
Environmental Review Tribunal		Ministry of the Environment
P.O. Box 2382		Ottawa District Office
2300 Yonge Street, Suite 1700		2430 Don Reid Drive
Toronto, ON M4P 1E4		Ottawa ON K1H 1E1
		Fax: (613)521-5437
		Tel: (613)521-3450

Where service is made by mail, it is deemed to be made on the fifth day after the date of mailing and the time for requiring a hearing is not extended by choosing service by mail.

Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal by:

Tel: (416) 314-4600

Fax: (416) 314-4506

www.ert.gov.on.ca

FOR YOUR INFORMATION

- Unless stayed by the Director or the Environmental Review Tribunal, this order is effective from the date of service. Non-compliance with the requirements of this order constitutes an offence.
- The requirements of this order are minimum requirements only and do not relieve you from complying with the following:
 - any applicable federal legislation;
 - any applicable provincial requirements that are not addressed in the order; and
 - any applicable municipal law.
- The requirements of this order are severable. If any requirement of this order or the application of any requirement to any circumstance is held invalid, the application of such requirement to other circumstances and the remainder of the order are not affected.
- Further orders may be issued in accordance with the legislation as circumstances require.
- The procedures to request a review by the Director and other information provided above are intended as a guide. The legislation should be consulted for additional details and accurate reference.

Provincial Officer's Report

Order Number
5830-6Z2PPW

Waste Management of Canada Corporation
2301 Carp Road, RR 3
Carp, Ontario, K0A 1L0
Canada

Site
2301 Carp Road
Ottawa

Observations

Waste Management of Canada Corporation (WMCC) operates a solid non-hazardous landfill site at Lots 3 and 4, Concession 3, Geographic Township of West Carleton in the City of Ottawa. The civic address of the landfill site is 2301 Carp Road. WMCC is licensed to use and operate a 35 hectare landfill area within a 133.02 hectare site. WMCC is operating under the authority of certificate of approval for a waste disposal site number A461002 that was issued by the Ministry of the Environment on August 17, 1994 and has undergone subsequent amendments; such as company name change, annual reporting period, and acquisition of contaminant attenuation zone land.

Commencing February 2006, the Ministry of the Environment's Ottawa District Office began receiving numerous notifications from the residents in the surrounding communities of Carp, Stittsville and Kanata indicating foul odour emissions from WMCC's landfill site. The residents indicated these odour impacts were causing them discomfort and loss of enjoyment of their property. The Ministry has since continued to receive complaints on a regular basis until the date of this report. Over 3000 complaints have been submitted during this time.

After meeting with staff from the Ministry's Ottawa District Office in May 2006, WMCC entered into a Voluntary Abatement Plan (VAP) in June 2006 to assess and resolve the odour emissions from the site. WMCC provided evidence that the primary source of the odour emissions from the site was from the landfill gas being generated from the historic waste contained in the landfill mound at the site. WMCC stated their capacity to extract landfill gas through their well network as well as their flaring capacity was not sufficient to manage the landfill gas being generated at the site. WMCC had applied (March 2006) to the Ministry of the Environment's Environmental Assessment and Approvals Branch (EAAB) to amend their air

certificate of approval (8-4076-99-0060) to include a temporary flare, a second enclosed flare, a landfill gas-to-energy facility and a bioremediation facility.

WMCC acknowledged that the capacity of the second enclosed flare is required in order to increase the wellfield vacuum and flaring capacity. WMCC submitted to the Ministry of the Environment's EAAB a revised application for an amendment to its air certificate of approval in July 2006. Certificate of approval 0741-6S9NPE (air) allowing the use and operation of the second enclosed flare was issued by the Ministry of the Environment on November 28, 2006 and revoked and replaced certificate of approval 8-4076-99-0060.

Between June and November 2006, WMCC enhanced their landfill gas (LFG) collection and flaring system by installing approximately 20 additional LFG wells, gas headers on north and east slopes, new LFG blowers as well as completing annual capping on 2 hectares and placement of interim cover on approximately 3 hectares, winterizing their odour control system and installing a site specific weather station.

WMCC advised the Ministry on November 2, 2006 that the excess landfill gas that had been generated ("banked") and was discharging from the landfill mound would require weeks to months after the commencement of the operation of the 2nd flare to be reduced to the point where the extraction and flaring capacity will match the landfill gas generation rate.

Following the approval and subsequent operation of the second enclosed flare on November 29, 2006 the residents in the community continued to report odour emissions at their residences. Residents have indicated adverse effects such as: having to turn off their air exchangers as they were able to detect landfill odour inside their homes, having to close windows to keep the landfill odour out of their homes, children unable to play outdoors, residents indicating that they have become nauseous and have suffered from headaches, and that they feel their property values have suffered a financial loss because of the landfill odours in their community.

To determine the success of the VAP in controlling odour emissions from the landfill site, the ministry initiated an odour survey assessment that commenced on January 25, 2007 and ended on February 23, 2007. The survey involved Provincial Officers conducting olfactory assessments in the community and the vicinity of WMCC's landfill site to determine if odours are present, and the likely source of the odours. Of the 39 odour surveys that were conducted during this time period greater than 50% of the surveys reported off-site odours at or near residential areas that were observed to be generated at the WMCC landfill site by conducting assessments at locations surrounding the landfill site and attempting to identify other potential odour sources. I have continued conducting odour surveys from February 23, 2007 to May 10, 2007 and have observed odours from the WMCC landfill site at or near residential areas that were at times obnoxious enough that I would not want to remain in the odour plume for any substantial amount of time and would not want to live in such an odour plume. I accurately determined the source of the odour as coming from WMCC's landfill site by conducting upwind, downwind and cross wind odour surveys and attempting to identify other potential odour sources. While I did observe and smell other odour sources near the landfill site such as manure, based on the nature and strength of the odours from the other sources, it is my opinion that they were not the source of the odour

smells that I determined were coming from the landfill site that gave rise to the complaints received. I have detected three distinct odours from the landfill site; sulfur/rotten egg odour, rotting garbage odour and a perfume odour.

Based on my observations conducting the odour surveys, and based on the observations of my colleagues conducting the odour surveys, as well as the numerous odour complaints I have received from the residents in the community indicating the adverse effects they have been subjected to by the odour discharges from the landfill site, I have reasonable grounds to believe Waste Management of Canada Corporation's landfill site, despite the activities carried out pursuant to the Voluntary Abatement Program, is still discharging a contaminant, namely odour, into the natural environment that is causing or is likely to cause an adverse effect, contrary to section 14 of the Environmental Protection Act. I also reasonably believe, based on the grounds set out above, that the requirements in the Provincial Officer's Order are necessary to prevent or reduce the risk of the discharge and/or prevent, decrease or eliminate the identified adverse effects resulting from the odours from the landfill site operated by WMCC.

Offence(s)

Suspected Violation(s)/Offence(s):
Act - Regulation - Section, Description {General Offence} 1) EPA - 14 (1), Despite any other provision of this Act or the regulations, no person shall discharge a contaminant or cause or permit the discharge of a contaminant into the natural environment that causes or is likely to cause an adverse effect. {186 (1)}

Greg Davis

Greg Davis
Provincial Officer
Badge Number: 725
Date: 2007/05/11
District Office: Ottawa District Office

APPENDIX I



CONSULTING ENGINEERS
& SCIENTISTS

February 16, 2007

Mr. Mike Walters
Waste Management of Canada Inc.
2301 Carp Rd.
Ottawa, ON K0A 1L0

RWDI AIR Inc.
650 Woodlawn Road West
Guelph, ON
Canada N1K 1B8

A member of the
RWDI Group of Companies

**RE: Proposed Ambient Air Quality Work Plan
RWDI Reference #W07- 1002P**

Dear Mr Walters:

In response to our recent conversation and the letter issued to you from the Ministry of the Environment dated February 5, 2007, RWDI AIR Inc. (RWDI) is pleased to submit this proposed work plan to conduct ambient air quality monitoring for Waste Management of Canada Inc. (WM) at the Carp Road Landfill in Ottawa, Ontario. This document confirms that WM has retained RWDI for this work and outlines the proposed plan to examine a number of air quality parameters at the site.

SCOPE OF WORK

Overview of Proposed Measurement Program

A number of air quality parameters will be examined at regular intervals. Five days of ambient measurements are proposed. The sampling will be conducted during June, July, August and/or September. The survey will include a total of five pairs of concurrent samples (ten in total) for volatile organic compounds (VOCs). In addition, 5 pairs of samples will be taken for reduced sulfur compounds including hydrogen sulphide, mercaptans and Total Reduced Sulphur (TRS). A maximum of two sample days will be allowed for each month. These surveys will include coincident sampling at locations both upwind and downwind from the facility. An on-site meteorological station will measure wind speed, wind direction, rainfall and ambient temperature concurrently with the field measurements.

Short-term (1/2-hour) samples will be taken. In order to best maintain the important upwind and downwind positions, the sampling locations will vary to adjust to current meteorological conditions. The results of this monitoring program will be compared to the applicable MOE Point of Impingement (POI) Limits for 1/2-hour samples. Sampling will be conducted only during periods when the landfill is operating. The samples will not be taken within two days of a significant rainfall (greater than 1 mm).

Reputation Resources Results

Tel: (519) 823-1311 Fax: (519) 823-1316 E-mail: info@rwdi.com Web: www.rwdi.com

CANADA
UNITED KINGDOM
UNITED STATES

Compounds of Interest

Table 1 contains a summary of the proposed target list for VOCs. Table 2 contains the proposed target list for reduced sulfur compounds.

Table 1: Proposed Target List for VOCs

CAS No.	Compound	CAS No.	Compound
76-13-1	1,1,2-Trichloro-1,2,2-Trifluoroethane	620-14-4/622-96-8	m/o-Ethyl Toluene
526-73-8	1,2,3-Trimethyl Benzene	108-38-3/106-42-3	m/p-Xylene
95-63-6	1,2,4 Trimethyl Benzene	535-77-3	m-Cymene
108-67-8	1,3,5-Trimethyl Benzene	78-93-3	MEK
591-76-4	2-Methyl Hexane	108-87-2	Methyl Cyclohexane
107-83-5	2-Methyl Pentane	108-10-1	MIBK
78-78-4	2-Methyl Butane	75-45-6	Chlorodifluoromethane
96-14-0	3-Methyl Pentane	123-72-8	n-Butanal
589-34-4	3-Methyl Hexane	91-20-3	Naphthalene
67-64-1	Acetone	111-84-2	Nonane
71-43-2	Benzene	611-14-3	o-Ethyl Toluene
123-86-4	Butyl Acetate	95-47-6	o-Xylene
124-18-5	Decane	109-66-0	Pentane
25915-78-0	Dichlorodifluoromethane	64-17-5	Ethanol
75-09-2	Dichloromethane	103-65-1	Propyl Benzene
100-41-4	Ethyl Benzene	100-42-5	Styrene
142-82-5	Heptane	127-18-4	Tetrachloroethylene
110-54-3	Hexane	108-88-3	Toluene
67-63-0	Isopropyl Alcohol	75-69-4	Trichlorofluoromethane
138-86-3	Limonene	79-01-6	Trichloroethylene
75-01-4	Vinyl Chloride	141-78-6	Ethyl Acetate
56-23-5	Carbon Tetrachloride	71-55-6	1,1,1-Trichloroethane
67-66-3	Chloroform	75-35-4	Vinylidene Chloride
106-93-4	Ethylene Dibromide	540-59-0	1,2-Dichloroethene
107-06-2	Ethylene Dichloride	N/A	Total VOCs

Note: N/A - Not applicable

Table 2: Target Sulfur Compounds

Hydrogen Sulphide
Methyl Mercaptan
Ethyl Mercaptan
Dimethyl sulphide
Dimethyl disulphide

Note: A determination of TRS will be made from the above specific compounds.

SAMPLING PROGRAM

Sampling Methodology

A number of quality assurance measures are proposed to be implemented throughout the program. This section provides details with respect to samplers, media, methods and QA/QC procedures.

VOC Measurements

Ambient air samples will be taken directly downwind and upwind of the facility concurrently. In general, the downwind samples will focus on capturing emissions from the landfill operations. The sampling locations (upwind and downwind) will be pre-selected based on forecasts of wind direction provided by Environment Canada and any directives provided by the MOE.

The sampling methods and analytical techniques are comparable to the Operations Manual for Point Source Air Quality Monitoring developed by the MOE for VOCs. Direction for site selection and duration for non-continuous measurements from the manual will also be implemented.

Sampling for VOCs will be based on the U.S. EPA Ambient Air Method TO-17 using adsorbent tubes. The tubes will be spiked with a deuterated vinyl chloride surrogate to demonstrate vinyl chloride recovery. Air samples will be collected on pre-cleaned adsorbent cartridges containing multiple carbons material by means of a diaphragm pump. The sample flow rate will be approximately 240 ml/minute and will be regulated with rotameters or mass flow controllers. Sample volumes will be approximately 7.2 litres as suggested by the MOE. The VOC stainless steel (SS) adsorbent tube dimensions are 6.3 mm x 140 mm, and the tube is packed with Carbotrap Y, Carbotrap X, Carboxen 569, Carbosieve S-III. Exposed SS field tubes will be returned to the laboratory where they will be processed for analysis.

The analytical methodology is comparable to EPA SW846 Method 8260B, NIOSH Method 2549 and equivalent to EPA Compendium Method TO-17. Calibration will be achieved using individual chemical response factors (TRFs) normalized against Toluene-d8.

Reduced Sulphur Measurements

It is proposed that the collection of reduced sulphur samples will be collected in tedlar bags at locations and times concurrent with the VOC samples. The samples will be collected over a ½ - hour period. The samples will be sent to an accredited laboratory and analysed using gas chromatography / flame photometric detection. The samples will be analysed within 24-hours of collection.

Meteorological Station

Continuous wind speed, wind direction, ambient temperature, and relative humidity measurements will be collected on-site during the sampling program. Five-minute averages for wind speed and wind direction will be collected during the 1/2-hour samples.

Quality Assurance Measures

A number of common quality assurance measures will be implemented during the sampling program to ensure the integrity of the results. These measures will include detailed documentation of all field activities, calibration of all samplers and a number of laboratory-related measures including sample handling procedures, and instrument calibrations.

All of the samplers will be bench-tested and calibrated in RWDI's office prior to field deployment and, in many cases, calibrated again in the field before use. For example, all of the low flow samplers will be calibrated against a certified primary dry cell standard, (i.e., dry cell calibrator) before and after sampling.

Chain of Custody forms will be completed and submitted along with the exposed samples to the laboratory. Where required by the method, exposed samples will be packed in coolers before transport.

RELEVANT AIR QUALITY LIMITS AND GUIDELINES

Measured 1/2-hour VOC concentrations from this proposed AAQM program will be compared to their respective Ontario Regulation 419 POI Limits. Regulation 419 sets forth explicit standards for a source's contribution to the concentration of airborne contaminants at the POI. The term POI is taken to be in the natural environment at the boundaries of the property. Based on the 1/2-hour VOC sample duration, the 1/2-hour POI Limits should be used as a comparison to determine off-site impacts, if any.

REPORTING REQUIREMENTS

Upon completion of each month of sampling, a brief status letter summarizing the measured data from each set will be issued to the WM, outlining measured levels in excess of the air quality limits, if any, and showing the status of the monitoring program. Any exceedances of air quality standards will be reported to WM within 5 business days of receiving the analytical report from the laboratory. It will then be contingent upon WM to report any exceedance to the MOE district office within one week. This reporting is a requirement specified within Regulation 419.

After the completion of the entire AAQM program, a draft report will be issued to the WM for review and comment, outlining the results of the entire program. To help expedite the review process, RWDI will issue both a bound copy and soft copy of the report to the MOE. The soft copy will be issued in PDF and Word format, and any relevant spreadsheets will be in Excel format, unless otherwise advised. The report will be suitable for inclusion in the annual landfill report and will include the following:

- Summary of all measured parameters which will include compound name as well as Chemical Abstract Number (CAS No.);
- Summary of all measured data. The measured data will include the all compounds listed herein;
- Comparison of all measured data to applicable air quality limits and guidelines;
- Comparison of upwind and downwind measured concentrations to determine net impact from the facility;
- Discussion of any exceedances to site specific operations and meteorological conditions during each sampling period;
- Site map illustrating precise sampling locations of upwind and downwind samples, and wind rose illustrating the meteorological conditions during each sample day; and
- Recommendations to help reduce off-site impacts, if applicable.
- If any samples are found to exceed standards RWDI will report the levels to the WM within 1 week of receiving analytical results. Under the new Regulation 419 the WM is then required to report the exceedance to the District MOE Office in a timely manner. There have been no exceedances measured in the past and none are expected this year.

CONCLUSION

Thank you for the opportunity to present this proposal. Should you have any questions or require additional information, feel free to give us a call at (519) 823-1311 (John DeYoe extension 2258, Colin Welburn extension 2325). We look forward to working with you on this project.

Yours very truly,

RWDI AIR Inc.



Colin Welburn
Project Manager

CTW/kic