

**WASTE MANAGEMENT  
WEST CARLETON ENVIRONMENTAL CENTRE  
COMMON QUESTIONS AND ANSWERS**

June, 2010

*Over the past weeks, we have been consulting with the communities that surround our site on Carp Road. The purpose of our consultation has been to listen to various questions, comments and concerns from these communities regarding our proposed West Carleton Environmental Centre (WCEC) and our Terms of Reference (TOR) for a new landfill footprint at the facility. To facilitate further discussion and information sharing with these communities, we have taken the key questions asked and provided below answers that we hope you will find address issues raised and related concerns.*

**Q.** *Why does WM need to pursue this project?*

**A.** Our existing landfill on Carp Road is expected to reach its current approved capacity by September 2011. While the City of Ottawa is responsible for managing residential waste, the industrial, commercial and institutional (IC&I) sector contracts with companies like WM for waste management services. We provide service to about 7,500 IC&I customers in Ottawa and the surrounding area. We want to continue to serve our customers in Ottawa and the surrounding area and continuing our current business operations at Carp Road will enable us to do this.

**Q.** *How much waste disposal capacity is required?*

**A.** Currently, more than 1,000,000 tonnes of waste is generated by residential and IC&I generators in Ottawa annually. IC&I waste represents about 70% of the total; residential waste is the other 30%. There is an ongoing need for waste disposal capacity for generators in Ottawa and the surrounding area.

**Q.** *What amount of waste disposal capacity will WM need?*

**A.** Based on our historical market share for waste disposal in Ottawa and the surrounding area, we estimate that WM will need up to 400,000 tonnes per year to continue to serve our customers. The overall amount of waste proposed for disposal is estimated to be 4,000,000 million tonnes, or up to 400,000 tonnes per year for approximately 10 years at the site. Since landfills are designed and permitted on the basis of air space, and given compaction of waste and cover material, the amount of air space needed is estimated to be 6,500,000 million cubic meters.

**Q.** *Why is WM seeking 10 years of landfill capacity?*

**A.** Given the importance of this facility to WM's business operations and to our customers in Ottawa and the surrounding area, WM wishes to maintain continued waste disposal capacity at this facility. However, WM understands the importance of increasing waste diversion rates and emerging new technologies as factors in long-term strategies for the management of waste. As a result, WM is proposing new waste disposal capacity of approximately 10 years. Inevitably, the landscape will have shifted dramatically by then. There should be maximum flexibility to consider all options at that stage.

**Q.** *Will the new facility accept waste from outside of Ottawa?*

**A.** The current facility has a service area of the Province of Ontario. However, WM has an agreement with the City of Ottawa to reserve up to 90% of the available waste disposal capacity at the current landfill for wastes generated from within Ottawa. WM intends to continue to provide this disposal service to generators from within the City of Ottawa. The remaining disposal capacity will serve needs of residential and IC&I customers outside the City of Ottawa, generally smaller communities immediately around the city and from time to time elsewhere in Eastern Ontario.

Please also refer to "Some Waste Management Commitments to the Community -- June, 2010" sent as a separate companion document.

**Q.** *What about encouraging more waste diversion?*

**A.** The City of Ottawa has a target of diverting 60% of the residential waste stream away from disposal. Most of this waste diversion will be achieved through the City's curbside recycling and Green Bin programs. We applaud the City's diversion efforts and support them with a residential drop off and e-waste recycling at our current facility. Diversion from disposal by the IC&I sector is regulated by the Province. The Province is in the process of considering legislative changes to enforce greater IC&I waste diversion. The City has developed its own strategy, *Diversion 2015*, to encourage IC&I waste diversion to reach 60%. Current IC&I waste diversion rates in Ottawa are less than 20%. WM is committed to develop diversion facilities at the same time as a new landfill footprint. The diversion facilities will have capacity to service about 75,000 tonnes per year, escalating upwards depending on demand. Actual diversion will depend on incentives to divert, recyclables commodity markets, enforcement and participation. When enhancement of these capabilities is warranted, we will act quickly.

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**Q.** *What alternatives will WM look at?*

**A.** WM will look at alternatives that are appropriate and reasonable for a private proponent to implement. The MOE approved *Codes of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario* (October 2009) outlines the consideration of alternatives to by private proponents like WM. The Code of Practice states "...*what is reasonable for one proponent to implement may not be reasonable for another when trying to solve a similar problem because the circumstances between proponents may vary widely. A private sector proponent's inability to expropriate land or implement public programs will influence the range of alternatives it may examine.*"

As it relates to WM and its business, the Code of Practice also makes reference to private sector proponents in the waste industry as follows: "*The private sector proponent may only consider landfill or on-site diversion because:*

- *It cannot implement a municipal waste diversion program such as curbside recycling;*
- *Export would affect their business; and,*

- *Thermal technology is not economically viable because waste volumes are too small.*

Therefore, based on the above statements within the Code of Practice, WM has identified and assessed only those alternatives that are appropriate and reasonable for WM to implement.

**Q.** Will a “full” EA be conducted this time for the proposed expansion?

**A.** WM is completing an EA that addresses all aspects of the EA Act (i.e. a full EA). However, WM intends to address the areas of rationale and alternatives to the undertaking as part of the ToR. As a result, the EA will be focused on the consideration of alternative methods only. The technical analysis will consider the broader environment.

**Q.** *How much longer would an expansion enable the site to keep operating?*

**A.** Our proposal is for a landfill approval based on an approximation of a 10 year operating life span. Other on site facilities would still operate and the closure plan would allow for recreational facilities/trails, etc to operate well past the 10-year horizon.

**Q.** *What about the odour issues from the current landfill? Will this continue to be an issue?*

**A.** Over the past number of years, WM has been working to better manage odours for the current Ottawa WMF site. The Ministry of Environment (MOE) recently completed an odour survey that confirmed the current facility is working within the regulated limits. WM has invested resources in the landfill gas control program to more than double the number of collection wells, which in turn has nearly tripled the ability to destroy the gas through the addition of a second flare. Further, WM has also placed final cover on the slopes in an effort to prevent any gas from escaping. An extensive monitoring program has been implemented to ensure that all proactive measures that have been implemented are working.

All of the measures implemented as part of the existing operation will be implemented as required at the new site. Most importantly, a monitoring program for the new site will be implemented from day one and will be updated as appropriate.

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**Q.** *Has the current landfill caused groundwater related problems in the area?*

**A.** The current Ottawa WMF controls off-site impacts to groundwater because WM collects, contains and treats all the liquid known as leachate that drains through the landfill and is captured and contained to ensure the protection of local groundwater. When the site was initially permitted in 1970 it was granted regulatory approval as a natural attenuation site, which means that the operation relied on the existing geology to effectively treat the leachate as it moved through the sub-surface soil. WM changed this process to a contained system, to capture and treat all leachate on-site through the use of a composite liner system and a series of wells to prevent movement past the site’s boundaries. The

results of continual monitoring of groundwater around the site are regularly submitted and reviewed by the MOE.

**Q.** *How is leachate handled at the site?*

**A.** WM uses advanced leachate containment, collection and treatment technologies to ensure the protection of groundwater. All leachate is collected and treated to standards approved by the MOE. The MOE is regularly updated on the operation of the leachate collection.

**Q.** *In relation to thermal treatment technologies, what about Plasco?*

**A.** While WM can't comment on Plasco's technology, WM is engaged in a joint venture with S4 Energy Solutions and has invested in Enerkem Inc., both of which utilize gasification technology. These two initiatives are in demonstration project stages, and WM will continue to explore opportunities for appropriate commercialization of this technology.

**Q.** *Is WM considering a Waste-to-Energy facility as an Alternative?*

**A.** WM only has commercial scale operating experience with mass-burn waste to energy technology for a municipal waste stream. This operating experience is available through WM's subsidiary, Wheelabrator Technologies Inc. Wheelabrator has been one of the most successful developers, owners and operators of commercial waste-to-energy projects in North America and currently operates 17 waste-to-energy facilities. Projects of this nature require a guarantee that a certain quantity of waste will be devoted to this alternative technology, to ensure their economic viability. Given the costs associated with thermal technologies, an agreement with the City for managing a controlled waste (i.e. residential) stream would be required prior to proceeding with this alternative. It is reasonable to expect that this alternative could be approved, but people should realize that no commercial scale thermal destruction facility has been approved in Ontario during the past 20 years.

**Q.** *How are property values affected by the landfill?*

**A.** Property value questions are a valid and legitimate concern for any landowner, including WM. The team at WM would be pleased to discuss any concerns directly with individual landowners.

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**Q.** *When will the current Carp Road landfill close?*

**A.** The current landfill is expected to reach capacity by September 2011. Once the capacity has been reached, the closure plan for the site will be implemented to ensure that the gas and leachate collection continue as required. In the future, it is anticipated that the current site will become parkland/ open space and will form one piece of the overall vision for the future WCEC.

**Q.** *These are uncertain economic times – what will happen to the closure plan if WM is no longer around?*

**A.** When a landfill permit is granted by the MOE, the landfill operator must post and maintain a significant financial assurance in the form of an irrevocable letter of credit issued by a Canadian chartered Bank in favour of the Province to ensure the safe closure and long-term management of the landfill. A significant sum of assurance has already been given for the long-term management of the Ottawa WMF.

**Q.** *Will the new facility cause traffic problems?*

**A.** Traffic volumes and patterns will be addressed in the EA and any appropriate mitigation measures will be incorporated to ensure that any negative effects do not occur.

**Q.** *The current site is an eyesore and any additional landfill will make it worse.*

**A.** In regards to the current site, a significant greening program has been implemented to ensure that the slopes are seeded and grassed. Additional landscaping around the site, including planting of trees around the perimeter to screen parts of the landfill and other ancillary operations has also been implemented.

**Q.** *The community has been told that the new facility will contribute to the local economy. In what ways will the WCEC contribute?*

**A.** The WCEC is a multi-layered diversion and residuals management facility, which incorporates community benefits from a disposal and recreational perspective. The WCEC will allow for public drop-off of residential wastes, which will divert, recycle and reuse valuable resources that would otherwise be lost in the landfill. With any community, the continued economic development of the local area and region is dependent on reliable, cost-effective and stable infrastructure. The expected economic benefits from the WCEC include job creation (approximately 70 permanent jobs), community host agreements and a community trust fund to support local causes and initiatives.

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**Q.** *You previously tried to expand this site and withdrew your ToR and stopped the process. Why are you back again and what has changed since the last time?*

**A.** Due to the volume of comments received and the issues that were raised by government agencies and the public during the ToR comment period, WM decided that there was insufficient time remaining to address these comments and the underlying issues in a meaningful manner. WM withdrew the ToR in order to revise the document and consult further with stakeholders at a future time. Withdrawing the ToR also allowed WM to address some existing issues with respect to the current operations to ensure that the current facility was up to standard prior to proposing to expand and develop the larger vision of the WCEC.

**Q.** *This site should be closed and the waste should be taken elsewhere for disposal. Why not continue to export the waste to sites in the United States?*

**A.** While exporting waste is a possibility, this would not satisfy or the desire of the community to be custodians of their own waste or the strategic or economic goals of WM's operations as a private proponent.

Exporting waste is not consistent with responsible waste management strategies or principles, as it is not a local solution and relies on shipping waste to other jurisdictions within the province, which are already experiencing an identified shortage of approved disposal capacity. Relying on others to take Ottawa's waste takes away the incentive to reduce waste.

It is no longer acceptable to assume that waste may be exported to the United States because of strong political opposition and the Province of Ontario reaching an agreement to phase out shipment of municipal waste to Michigan by 2010. In addition, at any time the Canada/U.S. border may be closed to waste shipments due to national security issues; at that time the waste would need to be dealt with at a local level.

The concerns of our company are not irrelevant here either. Relying on a third party for disposal is not financially feasible as WM's customers would not only be charged for transfer fees and disposal fees, but also subjected to the risks associated with transboundary movement of wastes. Reliance on a third party disposal facility would put WM at a significant disadvantage competitively.

**Q.** *You are trying to hide the landfill expansion with all these proposed diversion and recreational facilities. Who do you think you are trying to fool?*

**A.** We are not trying to fool anyone. Today, the City of Ottawa diverts less than 30% of waste away from disposal. The WCEC will significantly increase the percentage of diverted material that would otherwise end up in a landfill. By ensuring that other diversion facilities are incorporated into the overall vision for the WCEC, only post-diversion residuals will be disposed of in the landfill.

**Q.** *If you don't get approval for a landfill expansion, will you still go ahead with the proposed diversion and recreational facilities that make up the WCEC?*

**A.** Probably not. The revenue from the tipping fees associated with the disposal portion of the project helps subsidize many of the other facilities. Also, as mentioned previously, not everything can be recycled/re-used, so post diversion residuals must be disposed of somewhere, whether it is here at the Ottawa WMF, or elsewhere in Ottawa or Ontario.

**Q.** *Do you already own all the property you need for expansion and is it all zoned for waste management purposes? If not, and you somehow get MOE approval, can you be denied at the OMB on the re-zoning?*

**A.** WM owns or options all of the required property for the WCEC. The approval process for a project such as this is complex. There are many layers of approvals required, both provincial (EA, C of A's, etc) and municipal (Land Use, Noise Control, Council resolution, etc). While the proposed uses envisioned as part of the WCEC do not entirely conform with some of the existing OP and Zoning designations, appropriate amendments will be sought later on in the overall approvals process. It is important to remember that an EA looks at a broad definition of the "environment", including natural, social, economic and cultural aspects. Land use will be assessed as part of the EA, and the findings will "dove-tail" with future land use approvals as required.

**Q.** *If you get this expansion approved, it will just lead to another expansion in the future and so on. If somehow this expansion is approved, this has to be the first and last one ever at this site. Can you make this an official commitment?*

**A.** WM cannot make this an official commitment as we do not know, and cannot anticipate what the conditions will be many years down the road. What we can provide is an overall vision of the WCEC and the ancillary facilities/uses that WM is committed to implementing in concert with the landfill component.