



Richardson Corridor  
COMMUNITY ASSOCIATION

OttawaLandfillWatch.org

September 28, 2006

The Honourable Laurel C. Broten  
Minister of the Environment  
12th Floor, 135 St. Clair Avenue West  
Toronto, Ontario M4V 1P5

Dear Minister Broten:

We are a Coalition of Citizen Groups opposed to the proposed expansion of the Carp Rd. Landfill. Our members, all of whom are volunteers, constitute residents affected by this landfill and/or concerned about the environment in this province.

We are writing to you with regard to the state of the Carp Rd. Landfill, and information which we recently obtained under the Freedom of Information and Protection of Privacy Act (FIPPA) regarding this landfill. We received and have had the opportunity to review data from Waste Management's (WM) February 2005 annual groundwater monitoring report, prepared by Water and Earth Sciences Associates Ltd. (WESA) and supplied to the Ministry of the Environment (MoE).

Based on our analysis of the data contained in the monitoring report, we believe that contaminants typically associated with landfill leachate are likely present at significantly elevated levels over a wide area around the Carp Rd. Landfill. According to the material we reviewed, contamination levels in the majority of off-site monitoring wells exceed MoE reasonable use guideline (RUG) limits, in violation of Ontario Regulation 347 and Guideline B-7. In some instances the levels exceed Ontario Drinking Water Standards (ODWS). In addition, the data provided by WESA highlights the presence of volatile organic compounds (VOCs), which are characteristic leachate contaminants and include known and suspected carcinogens, in the groundwater northeast, east and southeast of the landfill.

The following points summarize our key findings.

1. WM asserts that the data does not conclusively indicate the existence of off-site leachate migration. We respectfully disagree. It is our opinion that the data provided in the 2005 Groundwater Monitoring Report fails to prove that leachate has been properly contained within the boundaries of WM property.
2. WM says that the high levels of some of the leachate monitoring criteria seen down-gradient are inconsistent with the landfill being a *unique* source of these contaminants because either:
  - a) the background levels are variable and sometimes exceed the ODWS limits;
  - b) the levels off-site sometimes exceed those in the wells characterizing the "leachate"; or

c) there is not a monotonic downwards trend in concentration with distance away from the landfill.

We respectfully disagree. The off-site levels are still above RUG limits for a considerable distance from the landfill and the claim of other sources for the contamination (e.g. the quarry) has not been substantiated. Furthermore:

- a) the down-gradient levels are undeniably elevated with respect to the background despite the variation in the background;
  - b) there are sound technical reasons why "leachate" wells should not be expected to show the highest concentrations; and
  - c) there is no reason to expect a monotonic trend if the purge wells are doing what they are supposed to do - namely trap leachate impacted groundwater.
3. WM reports that the high chloride and sodium levels seen in the down-gradient wells are due to road salt from Highway 417. Again, we respectfully disagree since WM's own data shows no Highway 417 effect up-gradient. Also, the sodium levels are over the ODWS.
  4. The presence of VOCs in the off-site wells is disturbing regardless of the source. These are known leachate contaminants that have serious health implications. Given this, VOCs should be more stringently and comprehensively monitored to determine their source and prevent the situation from worsening.
  5. In the case of some of the monitored compounds, the detection limit is too close to the ODWS (or above it, in the case of vinyl chloride) to provide adequate protection to groundwater users. This is unacceptable.
  6. In our opinion, the data included in the Groundwater Monitoring Report refutes WM's claims that the purge well system is working, since the levels down-gradient are not decreasing with time, with the exception of those related to ammonia.

We also offer the following additional recommendations.

- that special attention be paid to the choice of wells used to characterize the pre-existing ground water quality to ensure that they are clearly outside the zone of influence of landfill operation.
- that additional off-site groundwater monitoring points be included that will allow for any remaining confounding effects of road salt to be eliminated.
- that the distribution of sampling sites take into consideration the information reported in the latest annual report that groundwater flow now diverges to the northwest at the northwest corner of the property towards an area where there are considerable numbers of residents dependent on wells for domestic use.
- that the distribution of VOC sampling sites take in consideration the recent literature that suggests that the interaction of landfill gas with groundwater is a significant source of contamination. To date the sampling points have all been down-gradient of the waste mound. Landfill gas does not follow the directions of groundwater flow.
- that the analysis methods used for VOC monitoring have detection limits substantially lower than the ODWS.
- that further assurances be sought to establish if the current leachate control mechanisms

- including the purge well system are working effectively and that an analysis be done to show whether the system should be expanded to other sections of the periphery.
- that consideration needs to be made for the possibility of contaminated groundwater impacting the recharge zone of the tributaries of the Carp River.

Our analysis of the data raises some significant questions regarding the extent the leachate plume coming from the Carp Rd. Landfill. It also reinforces why the vicinity of the Carp Rd. at Highway 417 is NOT a suitable location for a dump of any size. Porous gravel over-laying fractured limestone under the Carp Rd. Landfill makes the surrounding area extremely vulnerable to groundwater contamination.

Given the extent to which contaminant levels found in the test wells exceed allowable limits and the established presence of VOCs, an independent assessment of the compliance of the site and the extent of leachate contamination of the groundwater aquifer and its migration off-site is essential prior to the consideration of any further expansion of the present operation. It is our understanding that the operator of this landfill, Waste Management, intends to file a Terms of Reference in the near future. In its Terms of Reference, it will seek a tripling and extension by approximately 25 years, of the present Carp Rd. Landfill.

We ask that the issue of groundwater contamination be fully investigated and resolved prior to the acceptance of the Terms of Reference related to the proposed expansion. In addition, that if there is groundwater contamination, it be rectified prior to proceeding with any Environmental Assessment related to the expansion.

Furthermore, we would like to formally request that the Ministry of the Environment conduct a thorough review, and if necessary an Environmental Assessment, of the present Landfill's Certificate of Approval, to ensure that it is consistent with current laws and policies. Our request echoes a recent motion passed by Ottawa City Council.

We believe that our request to you is consistent with the letter and spirit of the *Environmental Bill of Rights*, the *Environmental Protection Act*, and the *Protocol for Updating Certificates for Approval for Waste Management* (Ministry of the Environment, January 2005). Please note that this request for a review is in addition to a formal application for an investigation that is being made to the Environmental Commissioner under Part V of the *Environmental Bill of Rights*.

Furthermore, we would like to express our dissatisfaction with the ability to access the groundwater data and related information and the lack of transparency in the process. We were only able to obtain access to the test well data through a formal FIPPA request. Given the impact of the Landfill on the local community and its potential to pollute the environment and/or negatively affect human health, it would seem imperative and prudent to offer greater transparency and access to the information.

In closing, we respectfully request your full consideration of our concerns, comments and recommendations and look forward to your timely response.

Sincerely,

Vincent Lavoie, President, Richardson Corridor Community Association  
On behalf of the Coalition of Citizens' Groups opposing the expansion of the Carp Rd. Landfill.

c.c.: Michael Walters – Waste Management  
Gordon O'Connor – MP (Carleton – Mississippi Mills)  
Norm Sterling – MPP (Lanark – Carleton)  
Lisa McLeod – MPP (Nepean – Carleton)  
Bob Chiarelli – Mayor, City of Ottawa  
Peggy Feltmate – Councillor, Ward 4  
Eli El-Chantiry – Councillor, Ward 5  
Janet Stavinga – Councillor, Ward 6

No Dump  
Ottawa Landfill Watch  
Stittsville Village Association