

City of Ottawa Comment Summary Table

Comment(s)	Proponent's Response
<p>The MOECC, prior to granting approval for the Capital Region Resource Recovery Centre or any other additional landfill capacity, should establish fixed waste reduction targets, coupled to monitoring and public reporting requirements for the Industrial, Commercial and Institutional (IC&I) and Construction and Demolition (C&D) sectors and programs to support these diversion targets.</p>	<p>Taggart Miller believe that the diversion components of the CRRRC are a very important investment by the private sector to help increase the current very low commercial diversion rate in the community. We have committed to a Waste Diversion Protocol as described in the response to GRT Comment 83 which articulates the approach we will use to maximize diversion at the CRRRC over time. For Ministry disposition.</p>
<p>The MOECC, prior to granting approval for the landfill, should provide, working with the proponent, a net greenhouse gas impact assessment calculation for this proposal.</p>	<p>The potential greenhouse gas (GHG) effects are presented in Section 11.2.2.2 of the EA and in Section 5 of TSD #3. The results of the GHG emissions inventory including the summary of predicted annual GHG emissions rates and the GHG emission estimates by emission type are presented in Tables 5-1 and 5-2 of TSD #3, respectively. The quantification methodologies used are based on the Ontario Regulation 452/09 Greenhouse Gas Reporting. In addition, a comparative life cycle assessment of the proposed CRRRC project was carried out, which compares the diversion from landfill or a portion of the incoming waste to landfilling all of the waste in Section 11.2.2.2 of the EA and in Section 5 of TSD #3. The CRRRC project, with its significant diversion component, was calculated to provide GHG emission reductions of between 113,000 tonnes and 257,000 tonnes CO₂eq, compared to straight landfilling of these same wastes.</p>
<p>The City has significant concerns about the loss of forest cover and requests that the MOECC require there be no net loss in forest cover through the purchase or stewardship of equivalent quality/quantity forests or wetlands elsewhere within City limits.</p>	<p>The Site is characterized by a mix of thickets, immature deciduous forests, swamps, agricultural fields and limited residential structures and disturbed areas as described in Section 8.7.2 of the EA. A CRRRC opponent groups' expert biologist who reviewed the EA and areas surrounding the Site indicated that the Site itself is not biologically significant on a landscape scale. As any forest present is immature and not biologically significant net loss proposals seem unwarranted. The purpose of the comment, which came from a Councillor and not staff, is not even clear given the reference to "or wetlands".</p>
<p>The City encourages Taggart Miller to foster waste diversion activities for the IC&I and C&D sectors as a primary goal, and landfill disposal as a secondary measure. Waste diversion</p>	<p>See response above to similar comment.</p>

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<p>processes at the proposed facility should be regularly reviewed and updated to maximize diversion opportunities, and reflect changes in waste diversion technologies and markets that arise over the life of the proposed facility.</p>	
<p>The total allowable annual tonnage tipped at the proposed new landfill should decrease, proportionately to population growth and economic conditions, in accordance with rising diversion rates for IC&I and C&D waste.</p>	<p>The allowable incoming tonnage at the CRRRC will be capped at the level set out in the EA. Assuming receipts at that cap, if more waste is processed through the diversion components of the facility in a given year, less will be landfilled.</p>
<p>It is noted in the EA that the proposed facility would primarily service the IC&I and C&D sectors in Ottawa and portions of eastern Ontario. It is the City's expectation that the service area for all waste diversion and disposal facilities at the Site will be restricted to the City of Ottawa and Surrounding region (the United Counties of Prescott and Russell and the United Counties of Stormont Glengarry) as identified in the EA provided that loads containing mainly recyclable materials may be received from the broader "secondary service area" as described in the EA.</p>	<p>Due to proximity and transportation costs, the areas most likely to use the CRRRC will be the City of Ottawa, the United Counties of Prescott-Russell and the United Counties of Stormont, Dundas and Glengarry. The service area for the proposed CRRRC was clearly defined in the approved ToR and is repeated in Section 1.6 and Figure 1.6-1 of Volume I of the EA. It is primarily the Capital Region and a portion of eastern Ontario. As per the response to GRT Comment 207 in the Ministry Review, it will be up to the MOECC to determine if such a restriction is necessary or appropriate. It is noted that such a restriction on the service area would not in any way affect the results of the environmental impact assessment of the CRRRC.</p>
<p>The waste and contaminated soils originating outside of the identified service area described above will not be accepted at the Site for processing and/or disposal.</p>	<p>See response to comment above.</p>
<p>In 2011, the City adopted a policy document for the governance of waste in the city. This document, <i>Ottawa's Waste Plan</i>, set aggressive waste diversion targets for the residential, IC&I and C&D sectors. See Document 2 for details of these targets. The phasing and development of the proposed Site will have a significant bearing on the community achieving these targets. Therefore, the total annual allowable tonnage permitted to be disposed of at the landfill should always be less than the total annual tonnage of material processed at the Site's waste diversion facilities.</p>	<p>The City's position that the CRRRC will have a significant bearing on Ottawa achieving its commercial waste diversion targets is acknowledged. The Waste Diversion Protocol, referred to above, is intended to ensure that all reasonable efforts are made to maximize the diversion performance of the CRRRC over time.</p>

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<p>Leachate treatment – ROPEC, the City's wastewater treatment facility, may experience operational issues that would prevent it from accepting leachate from the proposed facility on a short-term basis. Therefore, it is essential that the proponent have a contingency plan in place to deal with any unanticipated service interruptions related to the operation of the City's wastewater treatment facility.</p>	<p>Contingencies, including short-term unavailability of ROPEC for leachate treatment, are described in Section 8.3 of Volume IV of the EASR. We also note that we are not aware of ROPEC ever having been down for any sustained period, or even on a short-term basis. All residential and commercial users in the City depend on ROPEC's availability.</p>
<p>Odour modeling results should be depicted as contours, in odour units, on an aerial photo of the affected area. Clearly showing the delineation of odour impacts would enhance reader comprehension of the overall modeled impact of odours.</p>	<p>This comment was previously addressed - see response to GRT Comment 177 in the Ministry Review. The MOECC Air Quality Analyst is satisfied with the odour modelling as indicated in Comments #98 and #100 in the Ministry Review.</p>
<p>Appendix B: Submissions Received During Initial Comment Period, Table 1: Government Review Team Comments – recommendation 20, as amended, from the Environment Committee report of April 29, 2015 was not included in the table. The recommendation stated: <i>Require that Taggart Miller post all PLC agendas, reports, meeting minutes immediately as they become available on a website hosted by Taggart Miller and dedicated to the PLC. Members of the public at large must have access to the website.</i> Please include this comment for the consultation record and consideration.</p>	<p>Note: A response to the comment referenced was provided to the MOECC. This is acceptable to Taggart Miller.</p>
<p>Appendix B: Submissions Received During Initial Comment Period, Table 2: Summary of Comments from the Public – the proponent has incorrectly characterized the City's perspective in comment No. 2. Neither City staff nor Council "support" this project, as indicated by the proponent's response. The City has provided comments on the environmental assessment throughout the consultation process and it is up to the Minister to assess the proposal and comments received</p>	<p>The comment was merely referring to the overall thrust of the four motions passed by City Council in 2015 concerning the project. The motions speak for themselves. This has been clarified with the City and MOECC.</p>

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to make a determination on the proposal based on this information.	
The Councilor's comments from the staff report of 29 April, 2015 do not seem to have been incorporated as part of the City's submission, and therefore are not specifically addressed in the review. Please add these comments to the other comments provided for the consultation record.	A response to the Councillor's comments attached to the staff report of 29 April 2015 was in fact provided to the MOECC.