

December 1, 2017

BY EMAIL

David Arnott
Senior Environmental Officer
Kingston District, Eastern Region
Ministry of the Environment and Climate Change
1259 Gardiners Road, Unit 3
Kingston, ON
K7P 3J6

Dear Mr. Arnott:

RE: RICHMOND LANDFILL - CCCTE COMMENTS ON SITE CONCEPTUAL MODEL, CONTAMINANT ATTENUATION ZONE AND KARST REPORTS

Pursuant to Mr. Dagilis's email dated November 10, 2017, I am writing to provide you with the comments of my client, Concerned Citizens' Committee of Tyendinaga and Environs (CCCTE), regarding the latest reports and memoranda prepared for or by Waste Management (WM) and the Ministry of the Environment and Climate Change (MOECC) in relation to the above-noted matter.

In particular, please find attached two interrelated reports from the CCCTE's hydrogeologist, Wilf Ruland, dated December 1, 2017 and May 30, 2016.

In summary, Mr. Ruland's December 1st report evaluates the information provided by WM, and discusses the MOECC review of the WM materials. After analyzing this documentation, Mr. Ruland concludes that:

The plume delineation is incomplete, with gaping holes in terms of the delineation on the eastern and western and southern sides of the landfill's intermediate zone groundwater contamination plume...

It is my professional opinion (having reviewed the 2017 SCM and CAZ Update Report) that the report is unsatisfactory and seriously deficient with respect to *providing an assessment with necessary supporting rationale as to whether the off-site leachate impacted groundwater has been delineated* as required by the ERT Order (original emphasis, pages 16-17).

Accordingly, Mr. Ruland's December 1st report offers seven key recommendations that the CCCTE strongly commends to both WM and the MOECC for immediate implementation.

In light of Mr. Ruland's conclusions and recommendations, it is readily apparent to the CCCTE that WM must undertake considerably more work in order to develop an accurate Site Conceptual Model and to delineate an appropriate Contaminant Attenuation Zone (CAZ).

At the same time, the CCCTE is compelled to highlight two fundamentally important matters that remain outstanding at the present time, and that must be resolved as soon as possible:

- the need for an updated Environmental Monitoring Plan to reflect all new monitoring wells and stations that have been established by WM; and
- the need for immediate public and agency notification of the latest testing results (e.g. the 1,4-dioxane detection in Well M192) in accordance with the approved Public Notification Plan (dated February 2013).

In closing, we trust that the CCCTE's concerns and Mr. Ruland's recommendations will be duly considered and satisfactorily addressed by WM and the MOECC as these investigations unfortunately drag on into 2018.

Please contact the undersigned at your earliest convenience if you have any questions arising from the CCCTE's comments.

Yours truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Richard D. Lindgren
Counsel

cc. Paul McCulloch, for MOECC
Harry Dahme, for WM
Eric Gillespie, for MBQ