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**SENT BY E-MAIL**

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February 19, 2019

Ministry of the Environment, Conservation and Parks (MECP)  
Jennie Weller  
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**RE: Comments on the Terrapure Stoney Creek Regional Facility Final Environmental Assessment**

In response to the submission of the Terrapure Stoney Creek Regional Facility Final Environmental Assessment, please find attached the consolidated comments from City of Hamilton staff. Please note that these comments are technical in nature.

Previous comments on the Preliminary Draft EA discussed in the City's letter to GHD, dated August 31, 2018, were brought to the City's Planning Committee on September 18, 2018 and Council on September 26, 2018. Additional technical comments from staff, were forwarded to GHD on October 22, 2018 in response to a request for comment on the Draft EA.

The following Final EA reports have minor outstanding matters as a result of comments by City of Hamilton staff (Attachment):

- Design & Operations Detailed Impact Assessment Report, prepared by GHD, dated January 2019
- Geology and Hydrogeology Impact Assessment Report, prepared by GHD, dated January 2019
- Land Use and Economic Detailed Impact Assessment Report, prepared by GHD, dated January 2019
- Noise Detailed Impact Assessment Report, prepared by GHD, dated January 2019

- Traffic Detailed Impact Assessment Report, prepared by GHD, dated January 2019

In summary, City of Hamilton staff had previously identified several gaps and issues that have generally been addressed in the SCRF Final Environmental Assessment Reports. Several minor outstanding comments remain and are outlined in the Attachment.

We thank you for the opportunity to comment on the Final Environmental Assessment Report. Should you have questions or comments, please contact Jennifer Roth at 905-546-2424 Ext. 2058 or via email at [Jennifer.Roth@hamilton.ca](mailto:Jennifer.Roth@hamilton.ca).

Regards,

Steve Robichaud, *MCIP, RPP*  
Director of Planning and Chief Planner, Planning Division  
Planning and Economic Development Department  
City of Hamilton

SR:jr  
Attachment

cc:  
Brad Clark, Councillor Ward 9  
Maria Pearson, Councillor Ward 10  
Chad Collins, Councillor Ward 5  
Dan McKinnon, General Manager, Public Works  
Angela Storey, Manager of Recycling and Waste Disposal Operations  
Tony Sergi, Senior Director, Growth Management  
Joanne Hickey-Evans, Manager Policy Planning & Zoning By-law Reform  
Christine Newbold, Manager Community Planning & GIS  
Anita Fabac, Manager Development Planning, Heritage & Design  
Matt Lawson, Manager, Public Health Services  
Justyna Hidalgo, Solicitor  
Debbie Edwards, Deputy City Solicitor  
Samantha Blackley, Capital Budgets  
Udo Ehrenberg, Manager Hamilton Water  
Jennie Weller, Project Officer, Ministry of Environment, Conservation and Parks  
([jennie.weller@ontario.ca](mailto:jennie.weller@ontario.ca))  
GHD Consulting, Blair Shoniker, Senior Waste & Environmental Planner, 65 Sunray Street, Whitby, ON  
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**Terrapure Stoney Creek Regional Facility Environmental Assessment  
City of Hamilton Staff Comments - Table 1**

<b>Section/Department</b>	<b>Staff Comments</b>
<b>Planning and Economic Development Department, Planning Division</b>	<p>With regards to the Noise Detailed Impact Assessment Report, prepared by GHD, dated January 2019, the following comments and questions should be addressed:</p> <ul style="list-style-type: none"> <li>• Based on the findings of the noise study, noise levels resulting from the revised landfill footprint will not exceed noise limits at any sensitive receptors during any phases of the landfill operation, based on the phasing plan outlined in the report.</li> <li>• Note that the phasing plan identifies Phase 3 of the landfill operations commencing in 2023. Should this phasing plan change, additional noise impact review would be required</li> </ul>
<b>Public Works Department, Source Water Protection</b>	<p>The following comments are provided regarding the Geology and Hydrogeology Impact Assessment Report and the Design &amp; Operations Detailed Impact Assessment, both prepared by GHD, dated January 2019:</p> <ul style="list-style-type: none"> <li>• GHD should provide a discussion of the corrections applied to the field permeameter testing pertaining to clay liner compatibility analysis.</li> <li>• The effective consolidation pressure used for the lab permeameter analyses was 18 to 25 kPa, the author should discuss the relevance of the effective consolidation pressure applied during testing to the anticipated consolidation pressures of the liner once the landfill is at capacity.</li> <li>• There was no leachate interaction / compatibility discussion or mineralogical assessment of the clay to identify its swelling potential, where smectite or illite clay minerals are predominant, additional conductivity analyses may be warranted using synthetic leachate. The author should discuss the clay compatibility with respect to the anticipated leachate water quality.</li> <li>• Due to the potential for groundwater impacts off-site, Hamilton Water recommends that a cursory review of any available domestic water quality from the proximal private wells be completed. An attempt should be made to re-establish a relationship with those residents</li> </ul>

Section/Department	Staff Comments
	<p>who have historically refused to participate in the monitoring program. An attempt should also be made to locate and include Private Well 1 into the monitoring program (if this well has not yet been decommissioned).</p> <ul style="list-style-type: none"> <li>GHD should provide greater discussion on the likelihood of onsite operations affecting downgradient groundwater quality onto neighbouring private property. Monitoring and mitigation of potential impacts should be incorporated into this discussion. Future development on downgradient property (and the subsequent need for potential dewatering for land development) increases groundwater quality risks to these downgradient properties.</li> </ul>
<p><b>Public Works Department, Infrastructure Planning &amp; System Design</b></p>	<p>The following comment is provided regarding both the Geology and Hydrogeology Detailed Impact Assessment Report and Surface Water Detailed Impact Assessment Report, completed by GHD, dated January 2019:</p> <ul style="list-style-type: none"> <li>Staff have stated that the limited capacity of the downstream sanitary sewer will dictate the release rate of any flows from the property.</li> </ul>
<p><b>Planning and Economic Development Department, Transportation Planning Division</b></p>	<p>The following comments are provided regarding the Traffic Detailed Impact Assessment Report, prepared by GHD, dated January 2019:</p> <ul style="list-style-type: none"> <li>The Transportation Planning Section reiterates that SCRF vehicles will not be authorized to use Green Mountain Road as it is not the most direct delivery route and not identified on the truck route map and is therefore subject to enforcement.</li> <li>In addition, a Truck Operations Monitoring Framework should be created and maintained. The framework should include driver training and awareness strategies as well as monitoring and evaluation strategies on an annual and/or semi-annual basis.</li> <li>Driver training and awareness strategies to improve driver sense of responsibility may include: <ul style="list-style-type: none"> <li>Reporting of vehicle safety and driver training certificates</li> </ul> </li> </ul>

Section/Department	Staff Comments
	<ul style="list-style-type: none"> <li>○ To adhere to safety requirements when operating heavy vehicles, keep the truck under positive control at all times, and observe all established traffic regulations (may include vehicle performance reviews);</li> <li>○ To be courteous to others - abide by the rules of the road, do not exceed the maximum posted or safe operating speed, and share the road with all road users (may include driver performance reviews);</li> <li>○ To drive defensively - monitor actions of other road users, changing the weather and road conditions, and maintain appropriate following distance in all driving conditions; and</li> <li>○ To be a good neighbour - adopt a designated truck route, avoid intrusion to the residential neighbourhoods, and unnecessary use of engine brakes near residential land-uses.</li> </ul> <ul style="list-style-type: none"> <li>● Monitoring and evaluation strategies may include: <ul style="list-style-type: none"> <li>○ Community complaint logs;</li> <li>○ Monitor and evaluate driver operational performance in alignment with MTO's safety guidelines for Commercial Vehicles Operators Registration (CVOR);</li> <li>○ Introduce technological measures to monitor the driving behaviour of the truck operators concerning their interaction with other road users and in accordance to road and weather condition;</li> <li>○ Create a frequent screening policy concerning vehicles exhaust system to alleviate the noise pollution and detect illegally modified mufflers; and,</li> <li>○ Incorporate GPS tracking technologies to: <ul style="list-style-type: none"> <li>▪ trace and embrace efficient routing;</li> <li>▪ monitor truck route compliance;</li> </ul> </li> </ul> </li> </ul>

Section/Department	Staff Comments
	<ul style="list-style-type: none"> <li>▪ reduce transportation costs;</li> <li>▪ improve operational service levels;</li> <li>▪ identify deficiencies and act responsibly; and</li> <li>▪ collect data to support and simplify business improvement and decision-making processes.</li> </ul>
<b>Healthy and Safe Communities Department, Public Health Services</b>	<p>At this point Public Health Services staff has no formal detailed comments as it deals with the environmental technical reports. Public Health Services staff do not require a modified Human Health Risk Assessment.</p> <p>Further, Public Health Services staff requested the inclusion of a Pest Control Plan in the Final Environmental Assessment. A Pest Control Plan was provided at the Draft Environmental Assessment stage and was subsequently approved by staff.</p>
<b>Corporate Services Department, Legal Services</b>	<p>Legal and Finance staff are presenting two reports to Planning Committee on February 5, 2019 (Reports LS18045 / FCS18072 and LS18045(a) / FCS18072(a)) to seek further direction on negotiating updated terms to the compensation agreement with Terrapure. Provided that Council is supportive of the recommendations made in the report, and negotiations ultimately prove fruitful, staff will seek to have the new negotiated terms form part of the conditions of approval.</p>
<b>Planning and Economic Development Department, Economic Development Division, Real Estate Section</b>	<p>The following comments are provided regarding the Land Use and Economic Detailed Impact Assessment Report, prepared by GHD, dated January 2019:</p> <ul style="list-style-type: none"> <li>• Valuation Methodology proposed by RIAS Inc. was approved by the City of Hamilton in November 2018, which included an assessment of transaction prices and / or CVA pre- and post- 1996. At this time, this assessment has not been provided.</li> <li>• Provision of an assessment of transaction prices and / or CVA pre- and post- 1996 or an explanation to be provided as to why the pre- and post- 1996 analysis was not completed by RIAS Inc.</li> </ul>