



June 3, 2025

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Attention: Dave Heyworth

Via e-mail: [Dave.Heyworth@hamilton.ca](mailto:Dave.Heyworth@hamilton.ca)

Re: GTR-25005241-A0

Project Name: **Peer Review of Land Use Compatibility and Preliminary Air Quality and Odour Impact Study - Elfrida Community**

Subject: **Peer Review of Land Use Compatibility and Preliminary Air Quality and Odour Impact Study - Elfrida Community  
Prepared by SLR Consulting (Canada) Ltd. - March 11, 2025**

## 1 Introduction

EXP Services Inc. (EXP) was retained by the City of Hamilton ('City') to complete a peer review of Land Use Compatibility and Preliminary Air Quality and Odour Impact Study - Elfrida Community prepared by SLR Consulting (Canada) Ltd. ('SLR'), dated March 11, 2025, hereinafter referred to as the 'Study', in support of a proposed urban boundary expansion in the Elfrida neighbourhood of Hamilton ('Project Site'). The stated intent of the study is to identify any existing and potential land use compatibility issues and to identify and evaluate options to achieve appropriate design, buffering and/or separation distances between the surrounding sensitive land uses, including residential uses, and nearby Employment Areas and/or major facilities.

This report presents our review of the Study. The Study has been reviewed for method, completeness, and accuracy of the findings in the Study. Our comments are provided in the following sections.

## 2 Scope of Work

EXP's peer review is comprised the following:

- Evaluation of the assumptions, methodologies and standards of practice used to prepare the assessment
- Review of the Study against the applicable policies of the Provincial Planning Statement and Rural Hamilton Official Plan

### 3 Peer Review Comments – Air Quality Assessment

#### 3.1 Introduction

SLR: It is noted that the Study has been conducted in accordance with the Terms of Reference (ToR) prepared by SLR, dated January 17, 2025, and provided in Appendix A of the Study.

EXP Comments: EXP understands that given the preliminary stage of the Project Site approvals, a detailed Odour Impact Study is not proposed at this time. Accordingly, EXP's review is limited to the ToR accepted by the City comprising a Land Use Compatibility – Air Quality and Odour Impact Study following the Ministry of Environment, Conservation and Parks (MECP) D-Series of Guidelines. Further, the results of this study will inform the next steps, including identification of where more detailed studies and/or air quality monitoring may be required within the Project Site.

#### 3.2 Description of Development and Surroundings

SLR: The Proposed development location and current occupation uses are described and it is noted that the proposed use is to support a mixed-use residential community in the early stage of the planning process. Due to the early stage, the site planning is incomplete and designation of land uses within the Project site has not been established.

EXP Comments: While EXP understands that planning is in the early stages, no information is provided on the density of the proposed project. Existing low density residential uses are provided for comparison without comment that the proposed project would have similar density. Opinion should be provided on whether there is a need for additional studies such as if high density (i.e. high rise) or significant open spaces are being considered.

##### 3.2.1 Surroundings

SLR: The surrounding land uses are described as residential to the west, and agricultural lands to the north, east and south with respect to the City of Hamilton Official Plan and City of Hamilton Zoning By-Law 05-200.

EXP Comments: The surrounding land uses are accurately described.

##### 3.2.2 Land Use Designations in the Area

SLR: SLR provides the land use designations with respect to The City of Hamilton Official Plan and City of Hamilton Zoning By-Law 05-200 within sections 3.3 and 3.3.1.

EXP Comments: The surrounding land uses are accurately described. It is noted that the only D-Series guideline considered is the D-4 series guidelines. While this is consistent with the ToR and limited to impact from the Stoney Creek Landfill, it should be recognized that as the planning progresses and the concept plan develops assessment with additional guidelines may be required. Specifically:

- D-6 Compatibility between Industrial Facilities for:
  - Rural industrial zoned properties east of Hendershot Road / South of Highway 20;
  - Properties zoned as Rural Industrial Business Park southwest of the Rymal Road East and Highway 56 intersection;
  - Properties zoned Prestige Business Park west of Trinity Church Road; and
  - Mixed use properties along Rymal Road East and Upper Centennial Parkway
- Air quality issues other than odour noted in D-4 Guideline such as "litter, contaminant discharges from associated vehicular traffic, visual impact, dust".
- The Ontario Ministry of Food, Agriculture and Rural Affairs (OMFRA) Minimum Distance Separation (MDS) Formulae given its proximity to farms.

- City of Hamilton's Framework for Processing & Evaluating Urban Boundary Expansion Applications guideline, which is currently in draft.

## 4 GFL Facility

SLR: SLR identifies that the GFL waste management Facility is located approximately 130 m northwest of the Project site and that it operates under the MECP Amended ECA Number A181008 and includes relevant MECP orders and permits.

EXP Comments: EXP agrees with SLR's identification of the GFL waste management facility's location and operation under MECP approvals. However, no discussion is provided in the Study with respect to the MECP Order which identified a failure to maintain an odour management plan and receipt of 302 odour complaints from local residents regarding various odours experienced off-site. The MECP Order concluded that GFL has not been operating in accordance with their Design & Operations Report and the ECA. Regardless of the distance of the proposed Site the Study should include comment on the status of the order and the likelihood of continued operations in compliance with the ECA and Design and Operations Report; or a rationale as to why it was not considered. The majority of complaints in 2023 were received in the fall season between September and November. Comment on if this is related to any seasonal operations and/or meteorological conditions in September and November would be helpful.

## 5 Preliminary Odour Impact Study of Stoney Creek Regional Facility

### 5.1 SLR Field Monitoring Program

SLR: Section 5.1 provides a description of the field monitoring program consistent with the City's ToR.

EXP: EXP agrees the field monitoring program is consistent with the City's ToR.

### 5.2 SLR Field Monitoring Program Equipment

SLR: Section 5.2 describes the use of a field olfactometer to conduct the survey, conversion to Odour Units and averaging periods, as well as SLR personnel qualifications and equipment calibration.

EXP: EXP agrees the field monitoring program equipment is consistent with standard industry practice.

### 5.3 SLR Quality Assurance/Quality Control

SLR: Section 5.3 describes the use of detailed field notes capturing observations, measurements, and meteorological conditions.

EXP: EXP agrees the quality assurance/quality control program is adequate.

### 5.4 Preliminary SLR Odour Monitoring Results

SLR: Section 5.4 describes the limited scope of the five-day monitoring program from February 10, 2025, to February 20, 2025, and choice of sampling times and locations. A summary of the findings of the weekly monitoring program conducted by GFL is provided in section 5.5 and further in Table 2.

EXP: EXP understands the summary provides a high-level presentation of the findings, however, more details on all sampling locations and meteorological conditions would provide more clarity and confidence in the program. For example:

- Including a map, such as in Appendix E, showing the location points and location numbers referenced in Table for easier reference.
- Including all sample data rather than just maximum or rationale why, and
- Confirmation location referenced as First Street is the adjacent road First Road West.

Also, it appears the tables referenced in section 5.4 for SLR sampling are for Table 3 not Table 2 as stated, and the Study should be updated accordingly.

## 5.5 External Data Reviews

### 5.5.1 Ministry of Environment, Conservation and Parks Facility Information.

SLR: Section 5.51 notes that obtaining compliant history is useful and that based on Environmental Property Information there are a number of documents that warrant a Freedom of Information (FOI) request. Further that such a request has been advanced.

EXP: While EXP understands the time frame for FOI response is uncertain and can be lengthy the history of complaints, ECA compliance, and available MECP order warrants an FOI request and recommends the report be updated on receipt of the information. It is further noted on the CLC web portal that 22 odour complaints have been received from April 10 to April 16<sup>th</sup> time period alone.

### 5.5.2 GFL Annual Reporting

SLR: In section 5.52 SLR notes that annual reports prepared by the facility are to be shared with the Community Liaison Committee and provided a summary of the complaints in Table 1. Further, that the number of complaints increased dramatically in 2023.

EXP: While EXP recognizes that the summary is accurate to 2023, a review of the CLC website portal indicates that complaints are ongoing. A rough breakdown of complaints for 2024 is provided in Table 1. The report is dated March 2025 and the website which includes information on number of complaints for 2024 and first quarter of 2025 is available. This gap should be addressed and the report updated accordingly.

Month	Number of Complaints
<b>2024</b>	
January	33
February	99
March	21
April	7
May	35
June	11
July	15
August	46
September	67
October	30
November	31
December	20
Total 2024	415
<b>2025</b>	
January	36

February	19
March	21
April	29

The CLC reports also notes that three air monitoring units have been installed to collect air quality data, located at the west landfill holding pond and the north buffer zone adjacent to Green Mountain Rd. W. These units monitor for TRS (Total Reduced Sulphur) and can be found on the Hamilton Air Monitoring Network (HAMN) website at [www.hamnair.ca](http://www.hamnair.ca). While review of this data is not specifically noted in the ToR, it is readily available and is relevant data which could provide useful information with respect to odour impact on the proposed Site.

### 5.5.3 GFL Weekly Monitoring

SLR: In section 5.5.3 SLR provides a summary of the weekly monitoring since June 27, 2024, and references Table 3.

EXP: EXP understands the summary provides a high-level presentation of the findings, however, more details on all sampling locations and meteorological conditions would provide more clarity and confidence in the program. Also, it appears the tables referenced in section 5.5.3 for SLR sampling are for Table 2 not Table 3 as stated, and the Study should be updated accordingly. It is also noted that the number of complaints suggests a higher frequency than observed during the survey.

## 5.6 Meteorological Data

SLR: Section 5.6 provides the meteorological data for a five-year period and notes the closest portions of the Project site are predicted to occur less than 10% of the time.

EXP: EXP agrees that the use of Hamilton Airport and the five-year sampling period is acceptable and common practice. Given the data has noted an increase in the occurrence of complaints in the fall season, an assessment of wind frequency and direction during the fall season would be prudent; or comment if the facility operations have seasonal differences which could account for the increased complaint history.

## 6 Mixed Odour Criteria

SLR: SLR provides an overview of the MECP assessment of mixed odours and rationale of the odour sampling program.

EXP: EXP agrees with the summary and rationale provided.

## 7 Conclusions

SLR: SLR concludes that there are significant odours that extend beyond the limits of the property boundary. Mixed odours identified as objectionable were primarily detected along property boundaries and in alignment with predominant wind directions. SLR notes odour detections have been less than 1000 m from the property boundary and only a small portion of the proposed development is within the buffer. SLR further notes existing sensitive receptors are closer in proximity to the property and the new development would not require a new condition for environmental compliance. Additional air quality study should be undertaken once more details about the project are known.

EXP: EXP agrees that an additional air quality study should be undertaken once more details are known if the project moves forward. While the use of warning clauses and mitigation measures noted in Section 8 are commonly applied in early stages of planning, EXP cannot comment on the effectiveness of warning clauses and mitigation measures unless such a study is completed and notes that some of the measures would not be effective for open spaces. EXP considers the odour survey findings, history of complaints, non-compliance with ECA and MECP orders are sufficient to require additional study before considering the proposed Site compatible.

## 8 Recommendations

Based on the odour survey findings, history of complaints, and non-compliance of the Stoney Creek Landfill with their ECA and MECP orders, the following is recommended before considering the project compatible:

- Conduct additional study once more details of the project are known.
- Updating the study with respect to CLC complaint history.
- Updating the report with respect to available data on the Hamilton Air Monitoring Network.
- Updating the report with respect to Table 2 and Table 3 numbering and reference in the report.
- Consideration of updating Table 2 with information noted in response in section 5.4 .
- Provide comment on the status of the MECP order and the likelihood of continued operations in compliance with the ECA and Design and Operations Report

## 9 General Limitations

Information in this report is considered to be privileged and confidential and have been prepared exclusively for the City of Hamilton. The purpose of this report is to provide the City of Hamilton with a Peer Review of the Land Use Compatibility and Preliminary Air Quality and Odour Impact Study – Elfrida Community, dated March 11, 2025, prepared by SLR. The information presented in this report is based on information provided by others and visual observations as identified herein. Achieving the objectives stated in this report has required us to arrive at conclusions based upon the best information presently known to us. No investigative method can completely eliminate the possibility of obtaining partially imprecise or incomplete information; it can only reduce the possibility to an acceptable level. Professional judgment was exercise in gathering and analyzing the information obtained and in the formulation of the conclusions we reach, but we commit ourselves to care and competence in reaching those conclusions.

Air quality conditions at various times may differ from those encountered. In addition, any changes to operations such as the introduction of new processes and/or alterations to air-handling equipment may render the conclusions of the report inaccurate or invalid. In the event of such changes, EXP should be contacted to re-evaluate the conditions with the assessed area and make appropriate revision to the original conclusions of this report

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## 10 Closure

We trust that the information provided in this report is satisfactory for your purposes. Should you have any questions or require more information, please do not hesitate to contact the undersigned.

Sincerely,

EXP Services Inc.



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