

SUMMARY OF COMMENTS

PROPONENT: Rural Municipality of Richot
PROPOSAL NAME: R.M. of Ritchot Waste Disposal Ground Class 1 Application
CLASS OF DEVELOPMENT: 2
TYPE OF DEVELOPMENT: Waste Disposal - Class 1 Waste Disposal Ground
CLIENT FILE NO.: 4412.00

OVERVIEW:

On January 22, 1999, Manitoba Conservation received a Proposal from Mid Canada Waste Management Ltd. on behalf of the Rural Municipality (R.M.) of Ritchot for the development of a Class 1 waste disposal ground (the Development). Mid Canada Waste Management Ltd. and the R.M. of Ritchot (the Proponents) were declared as partners for the proposed Development. The Development is proposed to be located on subdivision 4 of Section 32 - Township 8 - Range 4EPM in the R.M. of Ritchot. An existing Class 2 waste disposal ground, presently located and operated at this location, will be decommissioned once the Development is licenced and operating.

Manitoba Conservation, on January 25, 1999, placed copies of the Proposal in the Public Registries located at 123 Main St. (Union Station) Main Floor, the Centennial Public Library and at Manitoba Eco-Network and provided copies of the Proposal to the appropriate Interdepartmental Technical Advisory Committee (TAC). The newspaper and TAC notification invited responses until March 1, 1999.

Adrian Jackson represented Manitoba Conservation Environmental Approvals Section (the Department) until December 1999. Thereafter, Charles Conyette represented the Department as the contact person for the proposal and chairman of the Interdepartmental TAC reviewing the Proposal. Robert Boswick was assigned to assist Charles Conyette in the day to day follow-up activities for the Proposal.

On March 1, 1999 the Canadian Environmental Assessment Agency (CEAA) submitted information to Manitoba Conservation indicating that an environmental assessment under The Canadian Environmental Assessment Act (the Act) would not be required by federal officials with respect to the project.

During the period from June 25, 1999 to September 12, 2000, several meetings between the proponent, their consultants and the TAC were held while a number of technical reports and response letters were submitted in support of the Proposal. TAC members that remained actively involved in the assessment of the Proposal throughout the process were provided opportunities to present comments and concerns and request additional information. This process continued until

a draft Licence, incorporating the results of the TAC review process, was prepared for distribution to and comment from the original TAC members.

On September 18, 2000, a draft Environment Act Licence was distributed to appropriate TAC members. Comments were to be forwarded back to the Environmental Approvals Section by September 29, 2000. Much of the comments returned indicated no concerns while some requested alterations. Alterations to the draft Licence were prepared.

On October 2, 2000, Environment Act Licence No.: 2482 was issued pursuant to Section 11(1) of the Environment Act (C.C.S.M.c. E125) to the Proponents for the construction, operation and maintenance of the Development, being a Class 1 Waste Disposal Ground on subdivision 4 of Section 32 - Township 8 - Range 4EPM in the R.M. of Ritchot. The Licence was developed as a specific extension of the Public Health Act and the Environment Act, utilizing the information made available in the EAP and submitted documents and letters. Environmental requirements, encompassing the Development's construction, operation and maintenance and considering the concerns of the public, are incorporated in the Licence.

Pursuant to Section 27 of the Environment Act, the Licence may be appealed to the Minister of Conservation within 30 days of the date of the Licence.

OVERVIEW - Briefs:

- Date of receipt of Proposal – January 22, 1999
- Date of Proposal – January 1999
- Date when Proposal was sent to TAC – January 25, 1999
- Brief Description of the Proposal

The Development is proposed to be located on subdivision 4 of Section 32 - Township 8 - Range 4EPM in the R.M. of Ritchot. A Class 2 waste disposal ground is presently located and operated at this location. This Class 2 facility will be upgraded to a Class 1 designation. Solid waste is currently being received from residents and commercial establishments within the R.M. of Ritchot, and commercial/industrial solid waste is being received from commercial and industrial establishments from outside the municipality.

- Names and dates of newspapers in which Proposal was advertised
 - Winnipeg Free Press - January 30, 1999
 - Altona Red River Valley Echo - Feb. 1, 1999
- Public Registry Locations
 - Main Registry

- Centennial Public Library
- Manitoba Eco-Network
- Closing Dates for Public Comments – March 1, 1999
- Closing date for response from TAC – March 1, 1999
- Date and title of additional report submitted by the consultant – June 25, 1999 - Phase 1 Site Characterization
- Date and title of additional report submitted by the consultant – July 12, 1999 - Phase 2 Conceptual Design
- Date and title of additional information submitted by the consultant - October 14, 1999 - Response to Manitoba Conservation Letter and Attachments
- Date of meeting with TAC, consultant and proponent - November 3, 1999
- Date of letter from Manitoba Conservation to consultant requesting responses to outstanding issues - November 8, 1999
- Date when consultant responded to the November 8, 1999 request – November 23, 1999
- Date of meeting with consultant, proponent, Manitoba Highways and Government Services reps and TAC - February 3, 2000
- Date of letter from consultant summarizing topics of discussion at the February 3, 2000 meeting - February 8, 2000
- Date of letter from consultant to Manitoba Highways and Government Services - February 16, 2000
- Date when Manitoba Highways and Government Services responded to consultants letter of February 16, 2000 - March 22, 2000
- Date and title of REVISED report submitted by the consultant – March 2, 2000 - Phase 1 Site Characterization (received and distributed to TAC on March 3, 2000)
- Date and title of report submitted by the consultant - March 2, 2000 - Environmental Impact Assessment (received and distributed to TAC on March 3, 2000)
- Date and title of REVISED report submitted by the consultant – March 3, 2000 - Phase 2 Conceptual Design/Construction, Performance Monitoring and Closure (received and distributed to TAC on March 7, 2000)
- Date when Manitoba Conservation provided notice that the TAC assessment deemed the site acceptable for the siting and development of a Class 1 waste disposal ground - March 28, 2000

- Date when Manitoba Conservation provided notice to the proponent that a public meeting would be required in lieu of a public hearing - April 5, 2000
- Date of public meeting - May 18, 2000
- Date proponent submitted written report of May 18, 2000 public meeting - June 19, 2000
- Date and title of report submitted to Manitoba Conservation by the consultant – July 21, 2000 - Detailed Design - Construction, Operation and Closure (received and distributed to TAC on July 25, 2000)
- Date draft design drawings were submitted to Manitoba Conservation by the consultant - August 18, 2000 (received and distributed to TAC on August 18, 2000)
- Date of meeting for proponent(s), consultants and TAC – September 7, 2000
- Date when consultant responded to the September 7, 2000 request – September 12, 2000
- Dates when draft Environment Act Licence was distributed to TAC, the proponent and the consultant - September 15, 2000 and September 18, 2000
- Date by which any responses from TAC were required - September 29, 2000
- Date of issuing Environment Act Licence No. 2482 – October 2, 2000.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

See Appendix A.

PUBLIC HEARING:

A Clean Environment Commission public hearing was not recommended by the Director based on the following:

1. Any Environment Act Licence issued will address environmental requirements including protection of groundwater;
2. There is currently no provincial or department plan for waste disposal capacity in the Capital Region;
3. The Environment Act process is applied on a site specific basis and public hearing decisions are a discretionary decision; and

4. The R.M. of Ritchot will be required to convene a facilitated public meeting in the R.M. of Ritchot on the concept design and environmental assessment report on the proposal.

This information was provided by letter to persons with recent opposition to, or written expressed interest in, the project. The letter informed those persons requesting a public hearing that this recommendation could be appealed to the Minister within 30 days of the date of the letter.

Appeals from the public requesting a public hearing were not received by the Minister's office.

DISPOSITION OF COMMENTS FROM THE PUBLIC:

The principle concerns of the public regarding the proposed Development related to the January 1999 Environment Act Proposal and subsequent responses to requests for additional information or discussion are:

1. Groundwater pollution;
2. Surface water pollution;
3. Leachate and surface water management and treatment;
4. Wind blown litter;
5. Waste transport vehicles;
6. Radioactive waste possibly entering the Development for disposal;
7. Potential for odors; and
8. Potential impacts on local residences.

The principle concerns of the public regarding the construction, operation and maintenance of the Development were discussed during the most recent public meeting on May 18, 2000. The responses provided by the proponents were conveyed to the public at this time.

SUMMARY:

A Licence, incorporating environmental responsibilities and requirements and encompassing the Development's construction, operation and maintenance and which considers the concerns of the public and TAC, has been prepared.

PREPARED BY:

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October 6, 2000

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Appendix A

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Name	Address	Summary of Topics/Concerns	Date of Letter
Manitoba Conservation	Cliff Lee, P. Eng. Regional Supervisor Environment Act Winnipeg Region Environmental Operations	<ul style="list-style-type: none"> - Traffic concerns; - Groundwater assessment and monitoring information requires more detail; - Engineering assessment of leachate management and collection system required; - Details of disposal cell construction required; and - Site features such as radioactive detection necessary. 	99/11/17
Manitoba Conservation Water Quality/Terrestrial Quality Management Sections	Doug Bell Water Quality/Terrestrial Quality Management Sections Manitoba Conservation 123 Main Street, Suite 160 Winnipeg, MB R3C 1A5	<ul style="list-style-type: none"> - Comments regarding general siting conditions considerations; - Groundwater flow monitoring cannot be determined utilizing existing monitoring wells; - Hydrogeologic soil properties need to be determined through site investigations and calculations; - Time of travel calculations are required; - Silt lenses must be cut off during construction; - Need for declaration of compliance boundary details; - Additional information regarding monitoring well network and appropriate action for control and management required; - Details of groundwater sampling protocol required; - Details of groundwater sampling and testing parameters required; - Details of groundwater sampling frequency required; and - Details of site closure plan required. 	99/11/22
Manitoba Conservation	Rollie Fortin Water Quality Management Section Manitoba Conservation 123 Main Street, Suite 160 Winnipeg, MB R3C 1A5	<ul style="list-style-type: none"> - Clarification and design details required for leachate collection system; - Surface water management and testing protocol needs to be presented; and - Leachate treatment and disposal details required. 	99/11/25
Manitoba Conservation Water Quality/Terrestrial Quality Management	Doug Bell Water Quality/Terrestrial Quality Management Sections	<ul style="list-style-type: none"> - Groundwater elevations not yet stabilized; - Hydraulic gradient calculations should be reassessed; - Time of travel calculations should be clarified. 	99/12/06

Name	Address	Summary of Topics/Concerns	Date of Letter
Sections	Manitoba Conservation 123 Main Street, Suite 160 Winnipeg, MB R3C 1A5		
Manitoba Natural Resources	B. McTavish Director Policy Coordination Branch Box 38 200 Saulteaux Cres.	- Reports contain inadequate detail/discussion regarding; the leachate collection system design and operation, disposal cell design, horizontal and vertical transport of contaminants, groundwater monitoring and extent of site investigation.	00/01/12
Manitoba Conservation Water Quality/Terrestrial Quality Management Sections	Doug Bell Water Quality/Terrestrial Quality Management Sections Manitoba Conservation 123 Main Street, Suite 160 Winnipeg, MB R3C 1A5	<ul style="list-style-type: none"> - The groundwater elevation contour plans should also be updated for each monitoring event; - Time of travel calculations; - Suggesting a requirement for two nested wells in the first year and frequent sampling during the initial years; - Additional detail should be provided by the proponent regarding an action plan for when and if compliance conditions are exceeded; and - Additional details of anticipated monitoring frequency and duration should be provided and must address the post-closure period. 	00/03/20
Manitoba Conservation	Cliff Lee, P. Eng. Regional Supervisor Environment Act Winnipeg Region Environmental Operations	<ul style="list-style-type: none"> - Discussion regarding quality assurance and control as well as cell design requirements; - Suggesting storm water retention pond design and operation criteria is necessary; - Suggesting protocol for inspection of leachate collection system should be provided by the proponent(s); - Landfill gas monitoring protocol should be proposed; - Establish groundwater monitoring before operation commences; - Quality assurance and control during construction and monitoring is essential; - Site attendant must direct waste disposal and randomly check waste content; - Radioactivity detection system should be considered essential; - Measures required to ensure traffic routing and Bernat Road upgrading; - Landscape plan for the site should be submitted; and - Engineering assessment of lagoon treatment 	00/03/20

Name	Address	Summary of Topics/Concerns	Date of Letter
		effectiveness is required.	
Manitoba Conservation	Rollie Fortin Water Quality Management Section Manitoba Conservation 123 Main Street, Suite 160 Winnipeg, MB R3C 1A5	<ul style="list-style-type: none"> - Clarification of how liquids in the active cell will be managed; - Suggestion to add COD and BOD to tested parameters; and - Leachate management options/plans need to be addressed. 	00/03/21
Manitoba Highways and Government Services	Jack Gottfried, P. Eng. Director, Regional Operations Manitoba Highways & Gov't Services Box 1028 316-323 Main St. Steinbach , MB R0A 2A0	<ul style="list-style-type: none"> - PTH 59 and PR 210 can adequately accommodate current presented load requirements; - Bernat Road is under municipal jurisdiction; - PR 210 cannot be approved for semi-trailer allowable loading limits; - Intersections within PTH 59 and PR 210 consist of cross sections adequate to accommodate traffic volumes proposed, Bernat Road intersections may not; - No need for illumination warrants along the proposed route; - No hazardous goods will be hauled to the site; and - The assessment does not include the Bernat Road bridge over the Seine River Diversion. 	00/03/22
Manitoba Natural Resources	B. Betcher Groundwater Management Water Resources Branch Box 18 200 Saulteaux Cres.	<ul style="list-style-type: none"> - Proponent has adequately addressed sensitivity issue and the TOT₁₀₀; - Indicating reservations about traditional monitoring due to spatiality of existing water quality info; - Silt lenses must be monitored independent of external influence; - Nested well locations must be assessed for adequacy to acquire required record info; and - Proper abandonment of test holes and grouting of monitor wells must be ensured. 	00/03/22
Manitoba Natural Resources	B. Betcher Groundwater Management Water Resources Branch Box 18 200 Saulteaux Cres.	<ul style="list-style-type: none"> - Concerns regarding methodology of evaluating trends in groundwater quality (protocol needs to be confirmed); - Silt lenses locations require attention during construction and for monitoring; - Groundwater monitoring stations may not be sufficiently closely located to monitor all potential pathways; - Plans for abandonment and monitoring 	00/08/03

Name	Address	Summary of Topics/Concerns	Date of Letter
		<ul style="list-style-type: none"> - decommissioned Class 2 WDG are required; - Monitoring groundwater below disposal cells should be explored as being an option; - Action levels (such as for BTEX) should be reduced; and - Chloride should be included as a parameter to be monitored. 	
Manitoba Conservation	Cliff Lee, P. Eng. Regional Supervisor Environment Act Winnipeg Region Environmental Operations	<ul style="list-style-type: none"> - Quality assurance during construction and monitoring is considered essential; - Passive gas vents should not be a requirement of the design; - Access route issues need to be resolved and approved; - Control measures for traffic should be assessed; - Water quality assessments must be made prior to discharge from the Water Storage Area; - Action level/trigger for water quality impacts must be revisited; - Final closure of the Class 2 WDG should occur within on year of the issuance of the Licence; - Radiation detection unit must be required; and - Incorporate standard clauses for no burning, not receiving liquid and hazardous wastes and construct as proposed. 	00/08/08
Manitoba Conservation Water Quality/Terrestrial Quality Management Sections	Doug Bell Water Quality/Terrestrial Quality Management Sections Manitoba Conservation 123 Main Street, Suite 160 Winnipeg, MB R3C 1A5	<ul style="list-style-type: none"> - Groundwater sampling and analysis plan requires upgrading to target any impacts to the groundwater system; - Monitoring of shallow silt lenses should be required; - QA/QC should be incorporated to all monitoring programs; and - Closure plans and schedule for the Class 2 WDG must be identified. 	00/08/16
Manitoba Conservation Water Quality/Terrestrial Quality Management Sections	Doug Bell Water Quality/Terrestrial Quality Management Sections Manitoba Conservation 123 Main Street, Suite 160 Winnipeg, MB R3C 1A5	<ul style="list-style-type: none"> - Groundwater monitoring issues have been adequately addressed; - Requirements for closure of the Class 2 WDG must be effective; - Closure plans for the Class 2 WDG must be submitted for review. - How will the Development impact the closure of the Class 2 WDG? 	00/09/13
Manitoba	Walter Burdz, P.	- Response to September 7, 2000 letter from R.M. of	00/09/15

Name	Address	Summary of Topics/Concerns	Date of Letter
Highways and Government Services	Eng. Technical Services Engineer Manitoba Highways & Gov't Services Eastern Region Box 1028 316-323 Main St. Steinbach , MB R0A 2A0	<ul style="list-style-type: none"> - Ritchot; Intersection of PR 300S and PTH 59S will adequately accommodate the number and size of trucks intended; - Note that the present location of the connection to Bernat Road from PTH 59S will come out of service in the near future. At that point, Bernat Road will be accessible from PTH 59S via Oak Grove Road. 	
Culture, Heritage & Tourism	C. Gordon Hill Impact Assessment Archaeologist Main Floor 213 Notre Dame Ave. Winnipeg, MB R3B 1N3	- No concerns	00/09/21
Industry, Trade & Mines	B. Brennand Industry Development 500 - 155 Carlton St. Winnipeg, MB R3C 3H8	- No concerns	00/09/21
Agriculture and Food	K. McGill Agriculture Resources Section Soils and Crops Branch Box 1149 Carman, MB	- No concerns	00/09/22
Rural Development	N. Carroll Senior Policy Planner Provincial Planning Services 607 - 800 Portage Ave. Winnipeg, MB R3G 0N4	- No concerns	00/09/25

