

## **July 21, 2021 5:46 PM**

Hello:

Today a letter was dropped off at my door while I was out. The letter is dated June 21st but it was delivered on July 21st, so I assume the 15 days to ask questions starts today.

The letter explains the process and that odours will be contained within and removed prior to external venting. What the letter did not tell us was how much extra traffic to expect on County Road 2. Could you let me know how many trucks will be coming per day or will the railway behind the facility be used? Whether by truck or train, will the transport containers be airtight or will odours be escaping? What is the proposed timeline for having the plant operational?

## **July 22, 2021 11:25 AM**

July 22, 2021

To: Signing Director, Mr. Mohsen Keyvani

From: (name removed)

Dear Sir,

I received a letter from a Mr. Donald Duncan on July 21, 2021. I was not available and did not speak with him or his representative who may have visited my home on July 21<sup>st</sup>.

I am aware that a representative of H&D Properties Ltd (also referred to here as the Company) was going door to door and speaking with some neighbors.

I also know that the facility is being built on the former PraxAir/Air Liquide site and that a gas company may have extended a gas main to the site this past year.

Please respond to the following questions:

1. H & D Properties Ltd is not listed as a member of the Canadian BioGas Association. Why Not?
2. What is the planned start-up date?
3. Does the company have REG approval to proceed?
4. Who is the supplier of the Anaerobic Digester (AD) technology? Is it approved for use in Ontario by a Regulator? Will the supplier educate plant management, operations and maintenance using a recognized training and testing program?
5. Will a certified "stationary engineer" be present on site when the plant is operating?

6. Will the plant be operated and maintained using quality documents procedures and standards such as ISO9000?
7. Will the plant employ only qualified and certified tradespeople in its construction, operation, and maintenance?
8. Will the plant be certified "safe-to-operate" before start-up, by an authority or regulator?
9. Water: What is the source of plant water? Ground (well) or river?
10. Wastewater: How will waste liquids including process contact water and service water be disposed? Confirm that the facility will not operate a sewer to the St Lawrence River to dispose of process contact water or any wastewater; or dispose of wastewater to groundwater.
11. Traffic Increase: Plant throughput is 600 tonnes or 600 cubic meters per day. A typical transport carries 20k kg. That means approximately 30 trucks in and 30 trucks out on a continuous basis, 24 hrs a day, 365 days per year. The plant entrance is on a corner.
  - a. Will a turning lane be installed on hwy 2 at the plant entrance?
  - b. Will speed limits be reduced?
  - c. Will signage be installed to stop the use of truck airbrakes?
  - d. Have county officials been notified of the new traffic volume?
  - e. Diesel transports emit fumes and noise when idling: will diesel transports be shutoff while waiting to unload?
12. Will the plant operate on a continuous basis; 24hrsx7 days.
13. Noise: the continuous ambient noise levels in the adjacent RW (residential zone) is very low, given the country setting; quiet.
  - a. Will the plant be sound insulated and operated to ensure that the neighboring residential zone remains quiet?
  - b. How will the plant conform to the Environmental Noise Guideline (NPC 300)?
  - c. Will all blowers, compressors, flare stacks etc be insulated for noise in accordance with the standards defined by NPC 300 for manufacturing that abuts residential neighborhoods?
14. Raw Material processing: clarify what Industrial commercial and institutional source (IC&I) source separated organics (SSO) is.
  - a. Is this essentially food waste: grains, fruit, vegetable etc. from industrial food producers; and or sourced from recycled household food waste; manure?
15. Odours inside the Reception Building are treated.
  - a. Will carbon filtration be used?
  - b. Will there be odors outside that building not treated?
16. Bell supplied IT: phone and internet service in this neighborhood is already stretched. The service is limited because we have reached the capacity of Bell's infrastructure. Will the plant increase the demand on this infrastructure at the expense of the neighborhood?

end

## **July 22, 2021 12:00 PM**

I am responding to the letter your associate Donald Duncan of H & D Properties Ltd distributed to my home on June 2021 regarding the proposed construction and operation of an anaerobic digester facility at 1336 County Road 2, Maitland Ontario.

I am aware of the new funding grants available by the Ministry of the Environment for proposals to develop clean fuels. The timing of your plan to produce BioGas and fertilizer would fall under this opportunity.

I do not have a concern around Biogas production as this is supported by the Ministry of the Environment. I do however have concerns with your proposal as outlined. Please see my comments below:

- A) Your background and experience to construct and operate a safe business to ensure our community is protected
1. You and Mr. Duncan did not provide any background or experience to assure us you know what you are doing and you could construct and operate an efficient and safe Facility. In fact when I tried to find out more about you both, you do not exist.
  2. I did not find you or Mr. Duncan listed on the Canadian Biogas Association web site as members.
  3. I did not find H & D Properties Ltd listed on the Canadian Biogas Association web site as a member.
  4. I did not find you or Mr. Duncan listed on Face Book as members.
  5. I did not find H & D Properties Ltd listed on Face Book as a member.
  6. I did not find you or Mr. Duncan listed on Linkedin as members.
  7. I did not find H & D Properties Ltd listed on Linkedin as a member.
  8. I did not find you or Mr. Duncan listed on a google search.
  9. I did not find H & D Properties Ltd listed on a google search.

- B) Location of Proposed Facility

1. I have concerns that there will be odor impacting the enjoyment use of our properties located on the historic St Lawrence River.
2. I have concerns that there will be a noise impact from your facility that will impact our enjoyment use of our property
3. I have concerns that there could be a potential leak and seeping into the water table leading into the St Lawrence river from your facility. Even safe designs fail or are compromised over time if not cared for.

#### C) Traffic and Trucking

1. I have concerns that you identified a 24hr x 7days x 365 day a year operation with 600 tonnes of non-hazardous waste or up to 600 cubic meters of liquid non-hazardous waste per day. This is a huge volume of trucking and impact in our small village and along the historic County Road 2.
2. This is way too many trucks travelling on Hwy 2 with the potential for accidents.
3. This is way too many trucks traveling in this area with joggers, cyclist and sight seeing people traveling up and down the historic St Lawrence River Hwy 2.
4. The congestion and noise of all these trucks is not acceptable. The potential for more increased crashes, injuries and trucking accidents leading to spills and leaks is too great.
5. I am concerned that your plan is to take waste from all of Ontario. That is a large operation. When reviewing other Biogas sites, they work locally with farms etc and operate smaller facilities. You are planning on a major enterprise. Too big for our small area.

#### D) Impact to the Environment

1. I would require a copy of the Environmental Impact Assessment outlining at a minimum the following areas to even start to consider your company knows what you are doing and you have our interest, our health and our lands protected.
  - a. Impact on the air quality,
  - b. Potential for soil Contamination
  - c. Water table impact and contamination
  - d. Potential of effluent reaching The St Lawrence River

- e. Traffic and road repair due to increased heavy trucks
- f. Land value impact due to this facility

## **July 26, 2021 8:44 PM**

Recently I received a letter indicating that H & D properties has applied for an Environmental Compliance Approval from MOE to build an Anaerobic digester facility at 1336 County Road 2, Maitland Ontario handling upto 600 tonnes of non-hazardous waste or 600 cubic meter of liquid.

We have a number of concerns/questions regarding this proposal which I would appreciate clarity on

- How far along is this application process and what further approvals are required and by whom?
- How many residents have been informed of this proposed construction and facility usage?
- Will there be a formal public presentation to the surrounding area/residents including Maitland that would be impacted by this facility including the trucking in of this waste and the off gases (odor) produced?
- What exactly does "non hazardous" material entail in the context of this application?
- What steps can be filed to formally object to this proposed application?
- What environment impact studies will be done with respect to air quality, potential leakage of liquid waste into the water shed etc?
- What guarantees will be in place for local residents that noxious odors will not escape and negatively impact the usage and property value of residents in the area?
- What compensation will there be for decreased property value in the vicinity of this waste disposal facility?
- Will the Digestate be odorless? How will this be stored prior to shipping off site? How many truckloads of digestate will be shipped per day? How long might it be stored on site? What impact will this digestate have on air quality, water run off from the storage area etc?
- How much light pollution will this facility produce?
- How will leakage by trucks on local roads be addressed?
- Are all trucks completely sealed to prevent odor from impacting residents along its route?
- How many trucks per day does the current 600 Tons or upto 600 cubic meter of other liquid waste represent?

- What road safety improvements will be made to handle these heavy trucks especially entering and existing HWY 2?
- Where else has a similar (by size, by amount of material processed,) anaerobic digester facility been built and in operation?
- What impact has a similar facility had on local residents?
- How many full time jobs are created by such a facility?
- Why has this location been chosen where there are already toxic elements left behind by other large scale chemical plants?
- Has this location gone through an environmental inspection for toxic materials on the property prior to any new construction based on the former plants production?
- What makes this location ideal?
- What other locations have been considered?
- What guarantees will there be that this facility will not increase in size should permits be approved?

Without detailed information regarding the application process, appropriate residential impact assessments and further information we are not in favour of another industrial plant along the river regardless of its intended purpose.

## **July 27, 2021 11:38 AM**

More questions – pdf letter

A letter from a Mr. Donald Duncan regarding his proposed Anaerobic Organic Digester facility across the road from me was left at my door on July 21, 2021 (the letter was dated June 1 – copy attached).

The letter is very thin on information. While I'm not opposed to a well-run, facility that respects its neighbours and does not create noise or odours, we have not been given any information to assess this proposed facility and how it will impact our quality of life and our health.

The letter in fact, did not even make it clear that you were the MECP representative. My previous e-mail assumed you were a signing director for Mr. Duncan's company, so I apologize if that e-mail asked questions that were not related to your role in this process.

To assess this project, residents need to know:

- Who will operate this plant?
- If it is H&D Holdings, then we need to know how they are qualified to do so and/or what team they have put together of qualified individuals.

- What materials will be processed at this facility (will there be medical waste, meat processing/meat packer/meat rendering waste, sewage waste, etc.)?
- Who will be building the plant and who will be their supplier of the digester technology/equipment? What are their credentials / track record? Can we get a list of their past projects of this kind so that their track can be researched?
- How will traffic be dealt with on County Road 2?
- Will they have trucks lined up and idling waiting to unload? (And will that lead to corners being cut on the proper venting process?)
- Are the delivery truck containers airtight and leakproof?
- Will they have a generator available to keep the filtration/ventilation running in the case of power failures?

MECP related questions:

- Who acts as the building inspector on such a facility (I'm assuming our local municipal building inspector is not qualified for this type of project)?
- Are there standards that they must maintain regarding noise and odours, especially in light of the fact they say they plan to operate 24/7?
- Will testing be done now, of air quality and ground water, so that we have a baseline for future reference?
- Will rigorous testing be done prior to being allowed to go into full production mode?
- Is this industry self-regulated or are they subject to regular inspections and if so, by which regulatory body? Are those inspection reports public?
- What is the process for complaints by neighbouring residents? And how quickly are complaints acted upon? And what penalties / enforcement can be done? (We have been hearing about the StormFisher facility and its problems in London, ON, and don't want a repeat of that here.) – will be handled by Ministry conditions in ECA
- Will air sampling sniffers be installed to monitor odours outside the plant?
- Are they allowed to draw water from the St. Lawrence River?
- How will they be dealing with waste water?
- Once they provide a list of materials to be processed, can that list change in the future without MECP approval and notifying neighbours?

- Will there be a community forum/event where we can all get answers to these types of questions?

- Can H&D Properties be held accountable if what they say now vs. what happens later on is vastly different?

- What happens if H&D Properties do the start-up and then flip the operation, will new owners be bound to H&D Properties promises to us?

Thank you for your consideration of these questions and concerns.

## **July 28, 2021 1:48 PM**

I was visited last week by a Donald Duncan, owner of h and d properties ltd. he informed me of his intentions to construct an anaerobic digester plant on an adjacent property to mine. I have some concerns regarding such intentions, our property, as well as my neighbours is on the St. Lawrence river. Anaerobic digestors do not have a good reputation in regards to environmental odours, effluents, safety, etc. Mr duncan introduced himself to me as a farmer and former truck driver, he failed to supply me with credentials regarding his expertise in the engineering and construction of a multimillion dollar complex. Thankfully he supplied me with your name, of which he identified you as his signing director. I believe this would make you an employee of h and d properties, however when referring to your email address, it seems you are a government of Ontario employee also. I would be interested in knowing just what your role as signing director is and also your credentials in regard to advising concerned residents of their questions regarding this enterprise. Myself as well as my neighbours have many concerns and questions regarding the construction of and operation of the proposed plant, which i will reserve until later after you have replied to my email.

## **July 29, 2021 2:30 PM**

I have additional concerns.

There are technologies employed by BIOGAS producers that eliminate or reduce and control H<sub>2</sub>S.

We are concerned that the proponent will not install equipment, detection systems and operate as required to contain H<sub>2</sub>S and other odours.

We are concerned that this chemical and its sources will not be regulated under the MOE permitting process, even though events in South London clearly show that these compounds if not controlled are the cause of recent fines by the MOE.

I asked this question of CHFour and await an answer.



“Do you contain H<sub>2</sub>S within your process and mitigate against release. Do you have measurement data from customer property lines that show H<sub>2</sub>S is contained and controlled by automatic control systems including detection monitoring to ensure that levels are kept below the odour threshold limit, on your customers property.”

If H<sub>2</sub>S and or other odourous compounds are vented through doors, windows, stacks, etc, a north or west wind that blows 40% of the time will fill Claybank Bay with fumes.

I suppose that those fumes will end up in the USA or up and down the river.

We are concerned that the proponent or CHFour have not or are not capable of undertaking the necessary release modeling with meteorological data

The MOE should be setting the source standard for H<sub>2</sub>S at a level below the odour threshold limit as measured at the proponent's property line.

We are concerned that if the MOE does not take this kind of action the proponent will take shortcuts.

## **July 29, 2021 3:34 PM**

Could you please advise if the facility you are proposing for 1336 County Rd 2 Maitland On is similar to the one that just exploded and killed several people in Leverkusen Germany-ET BALFE

## **July 29, 2021 6:12 PM**

Firstly, many of the residents along the Waterfront Trail are proximal to the proposed building site for this commercial business and may not have been notified properly or given the requisite time to review and respond to this proposed venture. It is apparent that the correspondence was meant to be delivered early in June but was only delivered a month later. As such, I have reservations that many will not have been adequately informed or given the requisite time to prepare or review the potential impacts that this venture would have on the immediate community.

As a home owner I have serious concerns about living within the immediate vicinity of yet another large-scale commercial business. I have significant environmental and health concerns that this business may have on our community. Also, I have major concerns about the direct impact to the property values on our homes. Many homes along the St Lawrence river are multimillion dollar properties.

Albeit my knowledge around anaerobic digesters is limited I am hoping the you will be able to provide answers to my questions. I have significant concerns on the health and wellbeing of my community and how this business can adversely impact the quality of our lives. Anaerobic digesters ferment waste and animal products and byproducts

increasing the risk of odors and pathogens into the environment. Additionally, the inherent risks proportionately increase with the scale and size of the waste management site, maintenance, storage, and plant production. Hence why these plants are not suitable for urban and built-up residential areas.

Our concerns and questions:

- Has this business venture been approved or is it still in the planning phase?
- Who is responsible for making the decision to identify the proposed site for this business? This site is proposed to be established within residential affluent community of residents with many waterfront properties worth millions—why so close to a residential area?
- What is the approval process and how can residents be involved to actively voice their concerns?
- I understand that anaerobic digesters are not ideally suited for urban sites—then why is this business being considered to be so proximal to a built-up residential area?
- Is H&D Properties the sole proprietor or are the unnamed silent partners in the game?
- This is a large-scale business (24/7-365) that will create a significant amount of commercial traffic, noise and potential pollution to the community when delivering and processing 600 tonnes of “non-hazardous” waste material per day:
  - o What are the limits on the production? (600 tonnes of “non-hazardous” material is the minimum or would this potentially increase and to how much?)
  - o What exactly is “non-hazardous” material and how is this material stored, processed and disposed?
  - o Are there impacts and dangers to the processing of this waste material?
  - o How is the hazardous material stored and what assurances are being made to protect our properties from contamination?
  - o Treatment of odors—how is the odors controlled and what guarantees will be made to protect our homes from potential offensive odors?
  - o How much heavy commercial traffic is estimated to support this business and what will be the operating hours for this traffic—all day or only nights?
  - o Transportation of any biological waste has risks—what are the risks of spillage during transport and delivery?

- o What are the probabilities of a biological spill contaminating the soil and neighbouring properties?
- o How much ambient noise and light pollution will be introduced with a 24/7/365-day operation?
- o What are the environmental impacts as anaerobic digesters processing creates odor and pathogens?
- o What assurance will the Ontario government provide that the air quality will remain unchanged?
- o What are the inherent risks to the environment during the fermenting process, creation of effluent matter, contaminated water and bio toxic waste?
- o What are the inherent risks this process will contaminate the soil and water tables?
- o What are the inherent risks this process will pollute our air quality?
- o Are there any off-gassing during the production?
- o What are the inherent risks this process will create irritants and allergic issues?
- o What are the inherent risks to the surrounding protected avian and fragile aquatic wildlife?

As you can see, we have significant concerns around this business being established in our backyard. We are very protective of our investment and require information as well as assurances that will indemnify our intrinsic interest. We are not in support of this commercial plant nor any other industrial business along the river and the Waterfront Trail.

## **July 29, 2021 9:37 PM**

Re South London Stink problem associated with StormFisher BioGas, Orgaworld (tunnel composting) and the South London Landfill

The source of the problem is fugitive emission of H<sub>2</sub>S, methane and rotting waste odors. The stink continues because to the best of my knowledge a regulator has not set limits on noxious odors such as H<sub>2</sub>S. Building doors and windows should be treated under the permitting process as “sources” of fume emission.

Two photos are attached that show

With this kind of history any new installation in Ontario should have built in engineered solutions.

## Solutions?

1. The Township should step up and define noxious odours starting with H<sub>2</sub>S, in measurable terms such as Odor Threshold and not subjective terms. Specifically, the odor permitted at a company's boundary shall be equal to or less than the odor threshold.
2. Reduce or stop the production of H<sub>2</sub>S in the process using technology. Companies are working on micro aeration or ozone addition.
3. Clean vented gas with activated carbon filtration or scrubbers.
4. Buildings should be built with minimal doors and windows with all work taking place inside under negative pressure. Work includes waste disposal, off loading, loading truck, truck wash down etc. Only closed trucks, bins, etc should be permitted outside.
5. Doors should have plastic curtains when open for truck entrance.
6. If this is not practical, then the plant must be located at a distance from residential areas determined by fume dispersion modeling.
7. Hazard assessments: it should be mandatory before the twp approval of this facility that the twp sees proof of a OSH hazard assessment that has assessed and mitigated against odors greater than the odor threshold limit.
8. Walls and natural buffers should surround the site to separate it from the residential community.

## **July 30, 2021 7:14 AM**

I meant to say " the photos show the similarities between the London Site and the proposed Maitland Site, you can find this on google earth. use the google earth measuring tool to understand how close"

## **July 27, 2021 1:15 PM**

Email to duty officer, Sushant Agarwal replied

My name is (name removed). I am a retired (text identifying commenter removed). I was involved with many MOE Project Approval submissions over my career.

I was also involved in the design, procurement, operation, and maintenance of mitigation and abatement systems.

I would like to know if the MOE applies key learnings from industry charges and fines, when and if the same or similar technology comes before the MOE for new project approvals.

For example

StormFisher Environmental Ltd, London ON was fined for the emission of strong odours.

Kirchmeier Renergy Inc., St Isadore ON was fined for failure to control strong odours.

Ontario: Fines issued to anaerobic digester companies related to odour complaints – Advanced Waste Solutions

Will the MOE in its approval process for future BioGas Anaerobic Digester based installations, based on charges laid, require the identification of all odour causing sources, such as doors, windows, vents, air exhaust without scrubbing and or carbon filtration and open transports?

Some of these “sources” were the cause of the fines levied but would normally not be considered as “sources” when applying for MOE approval.

I don't want to have to go through what residents of South London Ontario have had to go through when StormFisher moved into the neighborhood.

## **July 30, 2021 7:17 PM**

I need to know if operations personnel will be present on site 24x7. This suggests that this specific example unit is not staffed but runs on Auto Pilot.

Is Donald Duncan building a unit that will run on auto pilot? The township should understand the operation plan.

## **July 31, 2021 9:35 AM**

Another council dealing with the complexity of BIOGAS. Another vague answer to the questions by the proponent to a question of odours. Odours can be defined and measured. Odour threshold limits are known for all major decomposition gases and compounds.

Policy makers, councillors, planners, and staff should not be vague when it comes to setting standards for odour emissions. London city staff are getting an education the hard way and worse for residents.

Landfills when in use are covered with sand daily to bury wastes to prevent gas emissions from decomposing food, diapers etc, but BioGas producers open the door and decomposition gases escape.

Is opening a door insignificant? Yes, and a properly constructed biogas receiving building would have a vapour lock: think inflated tennis court domes.

Do the math: based on a production rate input of 600k kg.

raw materials in and empty trucks out

60 transport movements at 10 minutes a move =10 hours /day.....large transport sized doors will be open 40% of the day. Unfortunately, at this level of open/close, the doors will be left open in good weather or on the back shift for fresh air. I know from experience that this becomes an administrative challenge.

Sludge out

60 or more transport trucks a day

? we don't know how sludge might be managed but suspect it's removed in a closed liquid loop via tanker truck with hose connections outside a sludge tank.

60 hose connections at 5 minutes per connection and it too will be a source of odour for 5 hrs a day

Combined there would be a fugitive emission from a transport truck size receiving door or truck hose connection for 15 hrs/day or 62% of the time.

Why was StormFisher fined? Because the doors were open for receiving more than 40% of the time?

## **July 31, 2021 10:39 AM**

There is work activity underway at 1336 County rd 2. There appears to be a large pile of bags perhaps demolition debris in the yard.

Please confirm that Demolition and Removal (D and R) of a brownfield site requires a township building permit.

If that is correct, please confirm that a hazard assessment (HA) has been completed by a knowledgeable and competent person in accordance with the Industrial Safety Act.

The purpose of the HA is to identify all regulated hazardous materials: asbestos, lead, found in building block, floor tile, ceiling tile, window construction, building and insulation etc.

This requires knowledge of regulations governed by MOL, SOH, WHMIS, MTO, TDG rules and regs. In other words the work must be permitted and done safely and correctly by competent and trained workers

Some site work is permitted before MOE project approval, but it very limited in scope.

## **July 31, 2021 3:36 PM**

Re - Wind Direction Air quality and shifting winds

There are many residents south, east, and west of the proposed plant that will be negatively affected by foul odours for days at a time.

The fact that the St Lawrence River is only 440 meters south of the plant will magnify the problem by facilitating odour spread up and down the shoreline.

A review of meteorological data from one year clearly shows that my property at 1347 County Rd 2 could face 80 days of stink in any given year and that is unacceptable.

Winds are as fickle as weather patterns. But weather patterns last for days at a time.

Will residents be dependent on wind to dilute or disperse the odours that will emanate from this plant if poorly engineered, operated or maintained?

My worst fear is that is exactly what will happen.

Mr. Duncan in speaking with a neighbour was quite satisfied that the only gas coming from his plant would be CO<sub>2</sub> and I quote "its natural".

Mr. Duncan fails to appreciate that CO<sub>2</sub> is a major green house gas and contributor to climate change.

South London residents continue to suffer when the wind blows their way while StormFisher and the city dither with finger pointing and odour detection.

I would ask that you please ensure that the gases and odours on the attached H<sub>2</sub>S fact sheet, plus methane and mercaptan are identified, quantified, and verified as sources; that impingement points be set as close as possible to "the closed receiving building", that no exhaust air from any source is allowed to vent to atmosphere without treatment; that odour measurement systems be installed and lastly that the source emissions be limited to the odour threshold or less.

## **July 31, 2021 5:06 PM**

Folks I am trying to ensure that the authorities know that an “incompetent person” as defined by the MOL, MOE, SOH, Industrial Safety Act is trying to build a hazardous manufacturing plant.

Whether Don Duncan is the owner, project record holder or whatever he has no right to do this in our neighborhood or any other in this township. The risks are real and quite frankly baffling to me that the project has gotten this far. I also plan to share this with Enbridge Gas the proposed customer of this operation.

Please make your concerns known to Enbridge Gas, the township, and the MOE.

## **August 1, 2021 6:41 AM**

I am trying to give the township a balanced perspective.

This is the company that built the Woolwich facility that the ministry speaks well of. It is a 110000 tonne Research and Development Facility in Elmira.

R&D facilities tend to be the flagship of the company. The place where you take customers. They tend to have better, more effective fume capture and containment, excellent housekeeping and operating standards.

Its also home base for the knowledge experts.

Its obviously very close to residences.

Even so they had complaints that I will track down.

If Mr. Duncan was held to this standard and if Mr. Duncan had this level of competency and organizational capability, I probably would not see his proposal as the serious threat that it is.

The photo shows the Bio-En Power Inc three domed facility in Elmira. Compare that with Double Diamond Farms at 10839 Van Camp Rd Mountain.

## **August 1, 2021 10:06 AM**

It would be pointless for me to simply reiterate the concerns of my next door neighbours, Jamie and Helene Harper. Let it however be on record that I share his concerns as do all of those that I know who live on #2.

This is a prime residential area. Residents pay exorbitant taxes for which we receive basically nothing in return, simply for the privilege enjoying the river.

Immediately north of here are open areas where a project of this type could be developed with far less disruption and risk of environmental damage. Should there be a



major leak or similar disaster where the site is proposed,, the effect on the St Lawrence river ecology could be catastrophic.

Traffic on #2 is already at a dangerously high level, a road on which our high taxes cannot even get the shoulders paved for the safety of cyclists. We need lower local truck traffic, not more. This region is a part of the vast Great Lakes Waterfront Trail. Nothing should be allowed to compromise it.

I believe that, although the concepts you presented on the good features of anaerobic digesters are probably valid, this project is planned for the wrong location.

## **August 1, 2021 11:23 AM**

Re Air Application 019-2772

I take exception to the fact that the proponent failed to notify any resident during the “open” period. It was “closed” before we could comment.

This was done during COVID 19 lockdowns. There were no public notifications or attempts to notify residents. The proponent has snuck this by area residents. That was despicable.

The emission list fails to include these compounds that are or reasonably expected to be, found in the proponent’s slurries, sludge, and waste streams and therefore air emissions.

The fact that they are not listed suggests to me that the proponent does know what he will emit, or he chose not to list them.

Please add these compounds to the list of emissions.

He also seeks to emit to the atmosphere contaminants including Sulfur Dioxide, methane, nitrogen oxides and particulate matter and noise.

This is exactly what he should contain within his process and NOT EMIT to the environment. No emission greater than odour threshold should leave the site.

Bio-En Woolwich Site Elmira staff of engineers and trained operations under professional management have implemented appropriate methods and installed mitigation equipment to deal with process, transports, on site wastes etc.

The proponent must meet or exceed these standards even though he proposes to build a plant with double the throughput and has absolutely no experience operating, maintaining a production facility of any kind.

How is this even allowed?

## **August 1, 2021 12:05 PM**

I have searched the MECP website but cannot find complaints/fines laid against specific biogas producers

StormFisher London ON

Bio-EN Woolwich Site, Elmira ON

Can you direct me to the location where these can be found please?

Mr. Mohsen Keyvani of the MECP suggest that I review them.

## **August 1, 2021 8:41 PM**

Re info from Mary Ann Van Berlo

CH Four are behind this one that was fined in Dec 2019.

send a note to the MOE and the twp, re the fine, what were the key learning and corrective action: if CH four technology is installed here will it fail in the same way?

## **August 1, 2021 8:48 PM**

I'm concerned as I'm seeing many transport truckloads of debris being hauled away from the site of the former Praxair plant over the last few months.

Are the proper permits in place to ensure that the cleanup of this factory / brownfields meets environmental regulations? And are there inspections / testing done to ensure that the surrounding area is not being harmed? I did a search on the Ministry of Environment, Conservation and Parks website for a "Record of site condition" (which I believe is required prior to any work), but none came up for our area.

## **August 2, 2021 11:53 AM**

Pdf doc 10 pages

Mr. Donald Duncan, owner of H & D Properties Ltd., delivered a Notice to our home on July 21 or 22 and had a short discussion with Donna. This Notice outlines a proposed Waste Disposal Site (with anaerobic digesters) facility at the former Praxair site — 1336 County Road 2, Augusta Township — very near to our home. We would hope you have seen this Notice, but in case Mr. Duncan neglected to send you a copy, it is attached as Appendix A.

That Notice, dated June 21, 2021 and delivered July 21 or 22, 2021, stated that if we had any concerns or required clarifications, we should "send written comments to the Signing Director (Mr. Mohsen Keyvani).... within 15 days of receipt of the Notice." We

do not know if the “15 days” is a regulatory requirement, however, this email is being sent within 15 days of receipt of the Notice. The time between the date of the Notice and the actual delivery of the Notice is an indication of Donald Duncan’s lack of organization and/or deceitfulness. The description of you as “Signing Director” misled us to believe that you were a representative of Duncan’s company. A few minutes on the internet showed us that is not the case. We will take advantage of the invitation to express our deep concerns over the proposed Waste Disposal Site (with anaerobic digesters) facility at 1336 County Road 2 in Augusta Township.

We bought our property at 1345 County Road 2 in 1983. We built a home on the property in 1984 and have lived there for the 37 years since. The distance between the property lines of 1336 and 1345 County Road 2 is 351 m +/- 5 m, as measured on Google Earth (Appendix B).

Donald Duncan, who dropped off the Notice at our home, did not impress us as a person with the knowledge or capabilities to construct and/or manage a facility as described in the Notice; in fact, he described himself as “just a farmer.”

The Canadian Biogas Association lists its “professional member companies” on its website – there is no mention of H & D Properties, Ltd. Does this man and/or his company have the education, knowledge, expertise and capability to construct and operate a highly technological and highly environmentally sensitive company? We think not.

The facility proposes to accept organic waste materials none of which are explicitly named; most organics have odours, some distinctive, and some of which are very malodorous. What is the dry, supposedly odourless, material which will be stored in silos? What does the digestate consist of? There is a dearth of information in this Notice.

Donald Duncan’s Notice implies that there will be no foul odours from the facility because everything involved is odourless and the building will be under negative pressure and any air will be treated before being discharged. We are sure that all anaerobic digester facilities have made similar statements before commencing to operate, underplaying the odours and complaints that come from their process technology. These goals are not always achieved, due to such things as open doors, spills, or discharging of contaminants. There will be odours caused by poor design and/or poor procedures and/or operator apathy or negligence around the use and operation of equipment for the processes and wastes to be handled. Some of these have been demonstrated by other such facilities, some of which are described in Appendix C. A review of meteorological data for one year clearly shows that any

harmful and/or unpleasant fumes from the facility are liable to blow in the direction of our property 22% of the time, that is, for an average of 1972 hours in a typical year. Odours can be defined and measured. Odour threshold limits are known for all major decomposition gases and compounds. Will the facility install equipment, detection systems and operate as necessary to contain noxious fumes, specifically at levels below the odour threshold level at their plant impingement points? When we, or our neighbours, walk out into our yards every morning, we want to breathe only the same fresh air as we do today!

Are there no waste materials from the intended processes? None are mentioned in the Notice. If there are waste materials, how will they be handled? Where will they be disposed?

Will the facility require water? What will be the water source, ground or river? If the facility takes water from the ground, how will the water table in the area be affected? Will there be limits placed on the amount of water which may be used per hour? Per day? Per month?

Will the facility discharge water? How much discharge per hour? Per day? Per month? How will the water be treated? Where will it be discharged? Surely not into the St. Lawrence River! Will there be odorific settling lagoons? How will our drinking water (well water) be affected?

Should a Hydrogeological Investigation and Terrain Analysis be done by the South Nation Conservation Authority before such a facility is permitted?

There is no mention in the Notice of the noise which may emanate from the facility itself. Why not? Will there be regular and random acoustic checks of noise levels? More on noise later....

The Notice states that **“H & D Properties has applied for an Environmental Compliance Approval from the Ministry of Environment, Conservation and Parks to process a maximum of 600 tonnes/day of material.”** Most transports carry about 40,000 lb per load, so 600 tonnes will necessitate 30 transports passing by our front doors each day to bring in the odorous organic garbage; if and when these transports leave empty, then another 30 transports pass our doors. How will the digestate be removed and transported? Is that another 30 transports arriving empty and another 30 leaving with the digestate each day? That could mean up to another 120 transports passing our doors, day and night, 365 days per year. How will all this affect noise levels in the area? How will this affect the flow of traffic on County Road 2 and the Maitland Road? How will the transport of the various materials affect the air quality in the area? Foul odours and multiple transport deliveries a day will ruin the residents' quality of life and enjoyment of property. Will there be limits imposed on the number of transport vehicles (large and small) entering and leaving the property per hour? Per day? Per Month?

When one examines the Ministry of Environment, Conservation and Parks (MECP) summary of the proposal, dated 2020 August 5 (<https://ero.ontario.ca/notice/019-2185#proposal-details> ), it states: **“The maximum daily waste received is 600 tonnes of non-hazardous waste and 600 cubic metres of other liquid waste.”** The obvious discrepancy between the Notice and the actual Proposal indicates Donald Duncan is lying in one document or the other, most likely the Notice he distributed. This summary of proposal now reveals a possible 240 transports per day on County Road 2 and the Maitland Road. These roads are part of the Highway 401 Emergency Detour Route system; they are also roads which are used frequently by the local emergency vehicles – ambulances and fire trucks. Indeed, the Augusta Fire Rescue Hall is located on the Maitland Road. There is an obvious possible problem!

In a second MECP proposal, dated 2020 December 3 (<https://ero.ontario.ca/notice/019-2772#proposal-details>), there is a statement that “Contaminant emissions to the atmosphere include: particulate matter, nitrogen oxides, methane, sulphur dioxide [and] noise.” None of these noxious discharges are mentioned in the Notice distributed by Donald Duncan; once again Donald Duncan is misleading the public to whom he distributed the Notice. At the time Duncan delivered the Notice to our home, Donna asked him specifically if the facility would create noise; Duncan lied and said no, contradicting his proposal submitted to the MECP.

It should also be noted that MECP provides a 45 day period for public comment on each of these proposals. The proposals were submitted and the comment periods fell during COVID lockdown times which makes public comment very difficult. Also, it should be noted that Donald Duncan did not inform the public of the proposals and the public’s right to make comment until 9 and 6 months after submission of the proposals respectively, a rather scheming and deceitful action.

Will the facility be operated by properly qualified and trained personnel? Certainly, the owner is neither qualified nor trained. Persons operating the facility must be knowledgeable in:

- relevant waste management legislation, regulations and guidelines;
- major environmental concerns pertaining to the waste to be handled;
- occupational health and safety concerns pertaining to the processes and wastes to be handled;
- management procedures including the use and operation of equipment for the processes and wastes to be handled;
- record keeping procedures;
- emergency response procedures;
- specific procedures for the control of adverse effects from the facility, and

- specific procedures for refusal of unacceptable waste loads.

The facility has to be constructed, installed, operated, and maintained in such a manner that ensures the health and safety of all persons (employees and neighbours) and does not cause any adverse effects. Will the facility take steps to minimize and ameliorate any adverse effect resulting from the operations at the facility, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the adverse effect? If at any time odours, pests, litter, dust, noise or other such negative effects are generated at the facility and cause an adverse effect, will the facility take immediate appropriate remedial action that may be necessary to alleviate the adverse effect, including suspension of all waste disposal activities?

Unfortunately when environmental breaches do occur at a facility, which may bother neighbouring residents and businesses, it can take years to bring the offenders to justice and to force them to solve the problems. In the meantime, the violations may continue and the neighbouring residents and businesses continue to suffer. Will the various levels of government regulate and supervise the operation of the facility? Does the local municipal government, the Township of Augusta, even have any regulations in place to govern the operation of such a facility?

The regulation, supervision and the random checks mentioned previously have to be done by the appropriate levels of government. These authorities must also institute procedures to verify the environmental records and reports made by the facility.

Most importantly, is the 1136 County Road 2 property zoned for a Waste Disposal facility? The property is zoned as Industrial Park - MP. The proposed facility does not fall within the listed permitted uses for an Industrial Park zone. It does fall under Augusta Township Zoning By-law, Section 7.15 Waste Disposal -WD; 7.15.3 Additional Provisions, Statement 2 states clearly: "Waste to energy facilities shall be permitted subject to any required Provincial permit or authorization." But that applies to land which is zoned for Waste Disposal. The Zoning By-Law does not permit the erection of a Waste Disposal facility at 1136 County Road 2, Augusta Township.

As residents of the Township of Augusta ***we reject any change to the official plan that would permit the installation of a Waste Disposal site at 1336 County Road 2.*** We trust that the Augusta Township Council will not see fit to change the zoning of the property. There are two areas in the Township which are zoned for Waste Disposal; why would any other areas in the Township even being considered for such a facility? Ontario is "a great place to live" (Ontario gov't web-site: <https://www.ontario.ca/page/about-ontario>), and Augusta Township "truly is a great

place to live and work and to enjoy life's many pleasures." (Augusta Township web-site: <https://augusta.ca/>) We would like these statements to continue to be truthful. Donald Duncan's proposal puts those statements at risk for those of us who live within the vicinity of the proposed Waste Disposal Site.

The Maitland Chemical Park has existed since 1954 in relatively close physical proximity to Maitland and nearby residents. The facilities are operated by large corporations with the leadership, scientists, plant competency, and deep financial pockets to do so safely. They conduct first party safety audits to check themselves and they are monitored and audited by second party regulatory and government agencies. Donald Duncan is "just a farmer" and would have no understanding of oversight and regulations and should not be allowed to operate such a highly technological and environmentally sensitive enterprise. He owns and operates the Double Diamond Farm at 10839 Van Camp Rd, Mountain — use Google Maps to look at a satellite photograph of the farm and ask if you expect such a person to operate an anaerobic digestion facility appropriately. Cutting hay requires much less education, knowledge, expertise and capability. The Maitland industrial complex has existed benignly for decades; "entrepreneurs in a number of business sectors are drawn to the quiet country ambiance of our area, while being located in close proximity to larger centres." (Augusta – Industrial Parks Sheet-1) We are certain the Mayor and Township Councillors will choose to continue this same relationship between Township residents and businesses.

Rather than fight for years the problems which a Waste Disposal Site (with anaerobic digesters) may cause to neighbouring residents and businesses, we think the best solution is to avoid such problems entirely. ***Do not permit such a facility to be built close to a residential area by incompetent, unqualified persons or companies, as defined by the Industrial Safety Act!!!***

## **August 2, 2021 4:33 PM**

As our home and property at (address removed) is adjacent to the site we have several concerns we would like to present.

1. **Air Quality** and Water Quality - will this digester affect either of these areas ..will there be any H<sub>2</sub>S emissions ? Any odours ? Will this affect our well water ?
2. This notice states it will process 600 tons of non hazardous waste /day. However we have been told that H&D Properties have applied for double that amount in their permit request. Can this mean over 200 trucks /day ? What are the actual numbers ? How many trucks will there be ?

3. Will this property be approved as a waste disposal site and if so how much waste will be stored on site ? According to meteorological wind data we have over 4000 hrs/year of wind directed from this site toward our home.
4. We are on Bob Shackles email list and now understand how the London community suffered under Storm Fisher and we don't want the same in this community. There were several solutions presented to Storm Fisher. Will our township follow these solutions ?
5. Will CH Four be involved in the operation of this plant or will Donald Duncan be responsible for all operational procedures ?

Will there be competent trained staff on site for 24 hrs/day ?

## **August 2, 2021 6:49 PM**

I found articles (links below) indicating that CH-Four Biogas was the involved in the installation of the Kirchmeier Farm AD system in St-Isodore, ON. Kirchmeier was also the subject of MECP fines.

Have steps been put into place to ensure that whatever problems occurred there are not repeated? Have lessons been learned from the Kirchmeier experience?

Does the Ministry or the Municipality require a performance bond from applicants to ensure compliance and/or reserves to deal with issues that might arise?

Seeing these types of issues with the firm putting together the proposal for 1336 County Road 2 does not instill confidence.

## **August 3, 2021 9:30 AM**

Word doc attachment

From: (name and address of commenter removed)

Dear sir,

This email is a follow-up to the email I sent you last week regarding the proposed BioGas waste Disposal Proposal to be located at 1336 County Rd 2 Augusta Township just 1 minute from our home.

Mr. Donald Duncan, owner of H & D Properties Ltd., delivered a Notice to our home on July 21 when we were not at home. This Notice outlines a proposed Waste Disposal Site (with anaerobic digesters) facility at the former Praxair site — 1336 County Road 2, Augusta Township — very near to our home. We would hope you have seen this Notice, but in case Mr. Duncan neglected to send you a copy, it is attached as Appendix A.



That Notice, dated June 21, 2021 and delivered July 21, stated that if we had any concerns or required clarifications, we should “send written comments to the Signing Director (Mr. Mohsen Keyvani).... within 15 days of receipt of the Notice.” We do not know if the “15 days” is a regulatory requirement, however, I responded quickly with an email to ensure I did not miss the deadline while I investigated further. The time between the date of the Notice and the actual delivery of the Notice is an indication of Donald Duncan’s lack of organization and/or deceitfulness. The description of you as “Signing Director” misled us to believe that you were a representative of Duncan’s company. A few minutes on the internet showed us that is not the case. We will take advantage of the invitation to express our deep concerns over the proposed Waste Disposal Site (with anaerobic digesters) facility at 1336 County Road 2 in Augusta Township.

We bought our property at (address removed) off County Road 2 and have lived here for the past 7 years.

Donald Duncan, who dropped off the Notice at our home, he sparse letter did not impress us as a person with the knowledge or capabilities to construct and/or manage a facility as described in the Notice; in fact. The Canadian Biogas Association lists its “professional member companies” on its website – there is no mention of H & D Properties, Ltd. Does this man and/or his company have the education, knowledge, expertise and capability to construct and operate a highly technological and highly environmentally sensitive company? We think not.

The facility proposes to accept organic waste materials none of which are explicitly named; most organics have odours, some distinctive, and some of which are very malodorous. What is the dry, supposedly odourless, material which will be stored in silos? What does the digestate consist of? There is a dearth of information in this Notice.

Donald Duncan’s Notice implies that there will be no foul odours from the facility because everything involved is odourless and the building will be under negative pressure and any air will be treated before being discharged. We are sure that all anaerobic digester facilities have made similar statements before commencing to operate, underplaying the odours and complaints that come from their process technology.

These goals are not always achieved, due to such things as open doors, spills, or discharging of contaminants. There will be odours caused by poor design and/or poor procedures and/or operator apathy or negligence around the use and operation of equipment for the processes and wastes to be handled. Some of these have been demonstrated by other such facilities, some of which are described in Appendix C. A review of meteorological data for one year clearly shows that any harmful and/or unpleasant fumes from the facility are liable to blow in the direction of our property 22%

of the time, that is, for an average of 1972 hours in a typical year. Odours can be defined and measured. Odour threshold limits are known for all major decomposition gases and compounds. Will the facility install equipment, detection systems and operate as necessary to contain noxious fumes, specifically at levels below the odour threshold level at their plant impingement points? When we, or our neighbours, walk out into our yards every morning, we want to breathe only the same fresh air as we do today!

Are there no waste materials from the intended processes? None are mentioned in the Notice. If there are waste materials, how will they be handled? Where will they be disposed?

Will the facility require water? What will be the water source, ground or river? If the facility takes water from the ground, how will the water table in the area be affected? Will there be limits placed on the amount of water which may be used per hour? Per day? Per month?

Will the facility discharge water? How much discharge per hour? Per day? Per month? How will the water be treated? Where will it be discharged? Surely not into the St. Lawrence River! Will there be odorific settling lagoons? How will our drinking water (well water) be affected?

Should a Hydrogeological Investigation and Terrain Analysis be done by the South Nation Conservation Authority before such a facility is permitted?

There is no mention in the Notice of the noise which may emanate from the facility itself. Why not? Will there be regular and random acoustic checks of noise levels? More on noise later....

The Notice states that **“H & D Properties has applied for an Environmental Compliance Approval from the Ministry of Environment, Conservation and Parks to process a maximum of 600 tonnes/day of material.”** Most transports carry about 40,000 lb per load, so 600 tonnes will necessitate 30 transports passing by our front doors each day to bring in the odorous organic garbage; if and when these transports leave empty, then another 30 transports pass our doors. How will the digestate be removed and transported? Is that another 30 transports arriving empty and another 30 leaving with the digestate each day? That could mean up to another 120 transports passing our doors, day and night, 365 days per year. How will all this affect noise levels in the area? How will this affect the flow of traffic on County Road 2 and the Maitland Road? How will the transport of the various materials affect the air quality in the area? Foul odours and multiple transport deliveries a day will ruin the residents' quality of life and enjoyment of property. Will there be limits imposed on the number of transport vehicles (large and small) entering and leaving the property per hour? Per day? Per Month?

When one examines the Ministry of Environment, Conservation and Parks (MECP) summary of the proposal, dated 2020 August 5 (<https://ero.ontario.ca/notice/019-2185#proposal-details> ), it states: **“The maximum daily waste received is 600 tonnes of non-hazardous waste and 600 cubic metres of other liquid waste.”** The obvious discrepancy between the Notice and the actual Proposal indicates Donald Duncan is lying in one document or the other, most likely the Notice he distributed.

This summary of proposal now reveals a possible 240 transports per day on County Road 2 and the Maitland Road. These roads are part of the Highway 401 Emergency Detour Route system; they are also roads which are used frequently by the local emergency vehicles – ambulances and fire trucks. Indeed, the Augusta Fire Rescue Hall is located on the Maitland Road. There is an obvious possible problem!

In a second MECP proposal, dated 2020 December 3 (<https://ero.ontario.ca/notice/019-2772#proposal-details>), there is a statement that “Contaminant emissions to the atmosphere include: particulate matter, nitrogen oxides, methane, sulphur dioxide [and] noise.” None of these noxious discharges are mentioned in the Notice distributed by Donald Duncan; once again Donald Duncan is misleading the public to whom he distributed the Notice.

It should also be noted that MECP provides a 45 day period for public comment on each of these proposals. The proposals were submitted and the comment periods fell during COVID lockdown times which makes public comment very difficult. Also, it should be noted that Donald Duncan did not inform the public of the proposals and the public’s right to make comment until 9 and 6 months after submission of the proposals respectively, a rather scheming and deceitful action.

Will the facility be operated by properly qualified and trained personnel? Certainly, the owner is neither qualified nor trained. Persons operating the facility must be knowledgeable in:

- relevant waste management legislation, regulations and guidelines;
- major environmental concerns pertaining to the waste to be handled;
- occupational health and safety concerns pertaining to the processes and wastes to be handled;
- management procedures including the use and operation of equipment for the processes and wastes to be handled;
- record keeping procedures;
- emergency response procedures;
- specific procedures for the control of adverse effects from the facility, and
- specific procedures for refusal of unacceptable waste loads.

The facility has to be constructed, installed, operated, and maintained in such a manner that ensures the health and safety of all persons (employees and neighbours) and does not cause any adverse effects. Will the facility take steps to minimize and ameliorate any adverse effect resulting from the operations at the facility, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the adverse effect? If at any time odours, pests, litter, dust, noise or other such negative effects are generated at the facility and cause an adverse effect, will the facility take immediate appropriate remedial action that may be necessary to alleviate the adverse effect, including suspension of all waste disposal activities?

Unfortunately, when environmental breaches do occur at a facility, which may bother neighbouring residents and businesses, it can take years to bring the offenders to justice and to force them to solve the problems. In the meantime, the violations may continue and the neighbouring residents and businesses continue to suffer.

Will the various levels of government regulate and supervise the operation of the facility? Does the local municipal government, the Township of Augusta, even have any regulations in place to govern the operation of such a facility?

The regulation, supervision and the random checks mentioned previously have to be done by the appropriate levels of government. These authorities must also institute procedures to verify the environmental records and reports made by the facility.

Most importantly, is the 1136 County Road 2 property zoned for a Waste Disposal facility? The property is zoned as Industrial Park - MP. The proposed facility does not fall within the listed permitted uses for an Industrial Park zone. It does fall under Augusta Township Zoning By-law, Section 7.15 Waste Disposal -WD; 7.15.3 Additional Provisions, Statement 2 states clearly: "Waste to energy facilities shall be permitted subject to any required Provincial permit or authorization." But that applies to land which is zoned for Waste Disposal. The Zoning By-Law does not permit the erection of a Waste Disposal facility at 1136 County Road 2, Augusta Township.

As residents of the Township of Augusta ***we reject any change to the official plan that would permit the installation of a Waste Disposal site at 1336 County Road 2.*** We trust that the Augusta Township Council will not see fit to change the zoning of the property. There are two areas in the Township which are zoned for Waste Disposal; why would any other areas in the Township even being considered for such a facility?

Ontario is "a great place to live" (Ontario gov't web-site: <https://www.ontario.ca/page/about-ontario>), and Augusta Township "truly is a great place to live and work and to enjoy life's many pleasures." (Augusta Township web-site: <https://augusta.ca/>) We would like these statements to continue to be truthful. Donald Duncan's proposal puts those statements at risk for those of us who live within the vicinity of the proposed Waste Disposal Site.

The Maitland Chemical Park has existed since 1954 in relatively close physical proximity to Maitland and nearby residents. The facilities are operated by large corporations with the leadership, scientists, plant competency, and deep financial pockets to do so safely. They conduct first party safety audits to check themselves and they are monitored and audited by second party regulatory and government agencies. Donald Duncan is “just a farmer” and would have no understanding of oversight and regulations and should not be allowed to operate such a highly technological and environmentally sensitive enterprise. He owns and operates the Double Diamond Farm at 10839 Van Camp Rd, Mountain — use Google Maps to look at a satellite photograph of the farm and ask if you expect such a person to operate an anaerobic digestion facility appropriately. Cutting hay requires much less education, knowledge, expertise and capability. The Maitland industrial complex has existed benignly for decades; “entrepreneurs in a number of business sectors are drawn to the quiet country ambiance of our area, while being located in close proximity to larger centres.” (Augusta – Industrial Parks Sheet-1) We are certain the Mayor and Township Councillors will choose to continue this same relationship between Township residents and businesses.

Rather than fight for years the problems which a Waste Disposal Site (with anaerobic digesters) may cause to neighbouring residents and businesses, we think the best solution is to avoid such problems entirely. ***Do not permit such a facility to be built close to a residential area by incompetent, unqualified persons or companies, as defined by the Industrial Safety Act!!!***

## **August 3, 2021 4:53 PM**

Can you provide information on the following:

- Escaped outdoors or smell from transportation, downwind from plant
- Heavy traffic on our road
- Possible hazards of materials stored there
- Natural gas facility hazard

## **August 3, 2021 8:22 PM**

Thank you for allowing the families and neighbours within the immediate area of the proposed Bio-digesting site the ability to respond with any concerns. As a Chemical Engineer (P.Eng.), current Fortune 500 Plant Manager with 24 yrs experience including an International assignment and plant manager with direct experience working across the street from a similar (but much smaller) Biowaste Reactor in London, Ont., I have very strong reservations regarding the change in land use as described in the miss dated June 21st 2021 letter I received on July 21st 2021.

My direct understanding and awareness of the proposed biological operation generates numerous specific permitting and operational concerns and questions partially outlined

by my neighbours previously (Specifically by (name removed)). However, my direct experience working every day for approx. 6 yrs straight across from a similar much smaller operation in London gives me a perspective that goes well beyond the numerous technical concerns and questions. The proposed Biowaste operation will have a negative environmental impact on the immediate surroundings, it is merely a matter of to what level the impact will be and what risks are worth accepting. From my direct experience it is not only the biomass waste main conversion itself it also includes the open tanks, product mix, digestate storage/handling, over capacity issues and offloading are key elements as well as the significant odours and waste run off from the truck traffic.

I would characterize living in the township of North Augusta as a privilege where outdoor recreational enthusiasts settle. As is obvious, properties near or on the beautiful St. Lawrence River are limited and expensive when compared to a similar property elsewhere. People, such as myself and my neighbours, have all accepted the increased costs with the intention of fully enjoying the outdoors, the natural beauty of the river and the outdoor area year-round. With first-hand knowledge I will confirm that this biowaste operation will absolutely decrease the level of reasonable enjoyment and I suspect will cause a strong concern and resentment by the community, along with a very real concern for the environmentally sensitive natural resource within meters.

The prospect of having a Biodigester utilizing multiple waste streams within a couple hundred meters of this natural resource and all the properties surrounding seems completely out of touch. I would respectfully ask that the MOEE and MNR conduct a proper and full environmental impact study and make public the findings regarding the expected impacts to the river, the water table (of which we all source our drinking water from thru wells), land area, air quality concerns, waste handling, noise concerns and finally the infrastructure impacts (such as but no limited to traffic, road suitability etc etc) prior to any further progress.

I am very frustrated and perplexed with how far this has proceeded already with seemingly low oversight as well as why there is not much more concern raised over the sensitivity of the location to an environmentally sensitive area and a prime residential area that not only thrives on the outdoors but is re-assured the environmental standards are upheld. The protection of this natural resource and its surroundings must be of utmost concern.

As an aside I am assuming you have no vested interest in this application as it is written in such a way to lead someone to believe you are a Partner (Managing director) for Mr. Duncan? As with the incorrect date I assume it was another mistake?

**August 4, 2021 8:00 AM**

Line of Fire is a term used in Process Safety Management. It asks engineers, planners, and authorities to consider what harm could we inflict on the community if we locate a plant there. Can risks be eliminated or mitigated? Unfortunately, the BIOGAS industry record is just one long list of fines and complaints. CHFour BioGas the supplier of this technology is no better than any other:

The Ontario Ministry of the Environment, Conservation, and Parks (MOECP) continues to actively prosecute anaerobic digester companies for odour issues. The Environment Ministry recently issued news releases detailing the latest convictions.

Kirchmeier Renergy Inc., StormFisher

This chart shows just how many hours in 2020 neighbors in the communities surrounding the EO 019-2185 proposed plant would have been in the Line of Fire; inundated by fugitive emissions, accidental releases, and those approved by MECP. Hourly wind direction data is collected from a calibrated meteorological tower located 1 KM further east along county rd. 2.

The data also shows the risk posed to an environmentally sensitive Claybank Bay and the St Lawrence River just 400 meters east. Meteorological data from 2020 show that winds blew in that general direction for approximately 4000 hours. The wind as the potential to carry to the St Lawrence River just 400 meters east, fugitive methane and or decomposition gases such as H<sub>2</sub>S and those sewer water type odourous compounds listed on the attached H<sub>2</sub>S fact sheet. Claybank Bay is an environmentally sensitive ecosystem. Diesel fumes from passing ships can be smelled Kms before they pass. Odours from this plant will spread the same way on the St Lawrence River with odour spread measured in square kilometers and dispersion time measured in hours if not days.

I do not deserve to be in the Line of Fire of this plant. The data says that I will be at risk for 1925 hours per year. The MECP Fines levied against these companies suggest that the risk is high that the same thing will happen here. I expect that during 1925 hours per year of its operation I will have to shelter in place with windows closed. I also expect that for 1925 hours in every year I will not be able to play with my grandchildren outside or hang up the laundry.

## **August 4, 2021 8:01 AM**

I am asking that the MECP stop all work on ERO 019-2185 and ERO 019-2772; until the MECP receives a non objection from Augusta Twp to proceed. Residents affected by this proposal have taken issue with zoning and the perception that the township approved the proposal for H and D Holdings to operate a Waste Disposal Site at 1336

County Rd 2. It is our contention that a zoning variance would be required, and at a minimum due process required by law has not been followed.

I was given no notice of a zoning change in this township. I was given no notice when this proposal was made to the township. New neighbors who purchased expensive river properties were given no notice, through signage, by agents by the township that this plant had advanced as far as it has. If the MECP had not forced H and D Properties to “notify neighbors” we and I suspect the township would still be oblivious to the state of this proposal.

Please verify that due process has been followed by contacting township officials.

### **August 4, 2021 1:50 PM**

We do not know but we suspect that the proponent may need to inject Mercaptan into the gas line as it is added to the methane.

Even though this spill was large the effects of a spill on this proposed site does contaminate ground water and takes a long time to evaporate.

We expect mercaptan or any like risk be properly installed on cement pads with recovery and containment methods

### **August 4, 2021 5:33 PM**

I am requesting that a “thorough and scientific gaseous flow and waste effluent emission study” be conducted before any further assessment of this proposal is considered, so that the South Nation Conservation Authority, other branches of the MECP and the township clearly understand the effect on residents, migrating waterfowl, fish populations and those who just stop by to enjoy the Bay in their boats.

Please consider this.....no one you see in this photo would be enjoying this protected Bay if the wind had been blowing from the north over the proposed waste disposal site. The fugitive emissions from trucks, process, effluent, and fugitive emissions would fill the bay with the odours of decomposing waste, eventually tracking the shoreline, and falling below the odour threshold limits kilometers away. I believe this to be true given my understanding of the river and our winds: I am a sailor.

Its difficult to describe this setting, I cannot call it a park, I cannot call it protected lands; maybe it is or should be, but Claybank Bay is 420 meters away, 10 meters below with all ditches and drainage leading from the proposed Waste Disposal Site to the river.

350 meters away cross a drained cornfield, Lemon Creek drains surface water from the proposed site and at least 10 sq kms of land surrounding the site. There is no clay to



prevent spills from seeping into and contaminating ground water. The soil depth is shallow.

Claybank Bay is part of delicate water system fed by local shallow ground water seepage above and filtered aquifers below. Geese and other migrating birds fill this bay in the spring and fall. I believe it's a strategic to their migration patterns.

## **August 5, 2021 8:24 AM**

We believe that the applicant without permitting installed a gas main from county rd. 2 to a Brownfield facility non operating site at some time in the last 3 years, namely fall of 2020.

Neighbors and I witnessed gas main installers, and construction road signage on or near the site. This was before we were made aware of the applicants' intentions.

The property Owners adjacent to the property confirmed that they did not have underground gas pipe installed.

To the best of our knowledge the local Enbridge owned delivery system does not reach the property but ends 200 meters to the south along county rd. 2.

To the best of our knowledge Union Gas (now) Enbridge had no intentions of extending the main along county road 2 for residential use to any resident including 1336 County Rd 2.

Therefore, the install of a gas main to an old building with no present or planned source of gas connection cannot be justified as a lease hold improvement but rather an investment made, and work undertaken in support of his proposal.

To the best of our knowledge this work must be permitted by the township. We believe it was done without the knowledge of the township building inspector.

More importantly, to the best of our knowledge an investment of this nature is not allowed by MECP regulation until an approved MECP permit is issued.

We ask that you act immediately and

- 1) verify that an investment has been made in a Brownfield asset intended for a new purpose before the MECP has approved the ERO 019- 2185 and 019-2722.
- 2) If verified as true we ask
  - a. that work on these permit applications is put on hold.

- b. Levy any or all fines if the actions of H and D Properties are deemed noncompliant with any Act, Regulations, or statute
- c. Order that the proponent: H and D Properties to stop unauthorized work on the site

We ask respectfully, to the best of our knowledge with the intention of minimizing harm to all stakeholders.

## **August 5, 2021 9:57 AM**

I live at 1365 County Road 2 in Augusta Township. I am beyond angry that a proposed business of waste disposal is progressing without clearly informing the residents of possible hazards, clearly posting permits, defining increased traffic levels, air quality and how operations will affect the quality of The St Lawrence River life. If done correctly and properly, several years of studies would be required and local residents would be surveyed and informed. There is zero transparency happening on all levels of government. This is small community, where the roads are not meant to take high volumes of truck traffic. The quality of the ecosystem of the St Lawrence River is very important and fragile.

Residents building docks have to go through great detail with the conservation authorities. Where is the paper trail that this proposed business has done at least as much. All levels of government have the responsibility to check this out in detail to protect the residents of the area. Any and all work currently happening needs to stop now. We need thorough studies and transparency; as a taxpaying resident, I expect no less from all levels of government.

## **August 5, 2021 11:01 AM**

The proponent never disclosed if sludge removed from the digesters daily will be inventoried in sludge piles on site or trucked away to be stored elsewhere.

We must assume that 1200 tonnes of sludge will be generated daily and have not been told how that will be managed to prevent stink in our neighborhood.

That the 1200 tonnes of hot sludge will off gas hazardous and or odourous decomposition products if removed and inventoried or shipped while off gassing. This is also true for the 1200 tonnes of incoming materials.

Does the application cover truck releases?

Has the proponent applied for "composting on site" specifically the storage of this material in piles? If so, we were not notified. Composting piles continue to decompose and off gas.

Opening a pile creates clouds of uncontained odourous emissions.

The proponent may build hot piles of sludge in other situations, and this should not be permitted .

Sludge must be contained until temperatures fall below decomposition temperatures. Any permitting should address this risk and ensure that composting or uncontained hot sludge in any form is expressly NOT PERMITTED.

## **August 6, 2021 9:56 AM**

I strongly object to the continued review of application ERO# 019-2185.

We ask respectfully to the best of our knowledge with the intention of minimizing harm to all stakeholders, that work be stopped on this file, until the issue is resolved.

We believe that H and D Properties Ltd filed 019-2185 for the purpose of building a Waste Disposal Site without due process on property they did not own when the application was made.

The records show that 019-2185 was filed on August 5, 2020, by H and D Properties. They did not own it. H and D Properties took possession of the property on Nov 13, 2020. Is that allowed?

It is also “unknown to us” if any township bylaws were followed or any permits and applications were made by H and D Properties Ltd or the previous owner D&R Drying Ltd. Is township endorsement of some kind not required before the MECP accepts an application?

I will also notify the Praxair Corporation today. A good company and neighbor continue to be misrepresented by H and D Properties Ltd or D&R Drying Ltd as a Praxair Site a producer of CO2 and dry ice.

Neighbors believed that sign to be true and were completely surprised by Mr. Duncan’s letter of June 21, 2021. Since January 29, 2018, several million-dollar residential transactions have occurred and are occurring (see the photos taken August 6, 2021), thousands of dollars have been spent on renovations, property enhancements oblivious to the planning and actions of the owners of these two companies.

## **August 6, 2021 9:07 PM**

A short time ago, whilst my wife and I were standing in our driveway, we were approached by a Mr. Don Duncan, who briefly explained that he had purchased land to the north/west of us which he planned to use for an organic composting project.

We asked if there would be any noticeable smell, and he assured us that there would not be. He indicated that there would be "slight" increase in truck traffic, but that this would be mainly at night and should not affect us.

He said that it was necessary for him to show that he had informed residents in the area, and we did acknowledge that we had been informed. That acknowledgement in no way shall be construed as our endorsement of his venture. On the contrary, following investigation of what was to be involved, both my wife and I are bitterly opposed to his plans.

Our knowledge of organic composting on a commercial scale being extremely limited, I have spent many days investigating what it is, and how it will impact the lives of people in a prime residential area. In other areas where this process has been employed in close proximity to housing there have been many problems.

In order to keep this letter readable, I will now move to point form:

1. To say that there would be no noticeable odor is simply not true. There have been many cases where lawsuits resulted in large fines for violation.
2. Looking at the projections for how much material would be shipped in , it indicates that there would be a minimum of 240 trucks per day increasing the already excessive truck traffic on highway 2. This would almost certainly continue 24/7 and would badly affect those who live close to the road.
3. Is Mr. Duncan trying to say that these trucks would not smell?
4. The trucked in material, would then have to be trucked out, following composting. Again, is there to be no smell?
5. An operation of this type requires water, and lots of it. It must then be assumed that the source of this water would be the St. Lawrence river. It must also be assumed that this water, once used, would find its way back into the river polluting it. This area of the river is used for pleasure boating, fishing and swimming.
6. Methane gas, in addition to smelling very bad, is also explosive.
7. For anyone to undertake any construction or demolition ranging from a garden shed to a large building, permits and assessment must all be made and put in place prior to any work starting. We see activity at the site, but no permits posted.
8. After looking at zoning maps for the area, this project appears to be in violation of current zoning.

9. A study of wind direction over recent time would indicate that our home would be downwind of this plant about 25% of the time, which amounts to over 200 hours per annum.
10. There are numerous other sites north of here that would be far more suitable. Possibly a combination of this project with the existing Coville waste facility should be considered.
11. Composting should be described as processing and or processing with anaerobic digestion, you could say I fear that they will need to build large compost piles or waste piles on site, increasing odors
12. Be assured that opposition to this project is growing fast. It needs to be stopped immediately. If it is allowed to proceed, then it will be too late as the damage will be done.
13. The elected officials in this area, at all levels of government, must have been aware of this proposal long before the casual and idealistic picture that was shown to me in my driveway by Mr. Duncan. The job of any elected official is to protect the well being and safety of the constituents. Why is it that nobody drew any of this to the attention of the thousands of people who could be adversely affected? Should this not be part of the job you are paid and/or elected to do?
14. Methane, as a greenhouse gas contributes to 26% of global warming, and is 84 times more potent in that regard than carbon dioxide. One cannot believe that all methane produced will get into a natural gas pipeline. Much will reach the atmosphere.

My wife and I bought our home at #1365 in 1998. We were nearing retirement and wanted to live with clean air, clean waterfront, peace and quiet. We left Toronto to find paradise, and we love it here. The taxes we pay are exorbitant, bearing in mind that we get virtually no services in exchange.

All of this would deteriorate very quickly, along with a rapid decrease in the value of our home should this project go forward. We have, in recent years, spent a lot of money upgrading and enhancing our property. Should we have known what is being planned, we might well have done less knowing that our home value is likely to drop.

As I said earlier, this project must be stopped immediately.

**August 9, 2021 6:46 AM**

We are aware that London ON City Environmental Officials and the StormFisher company are monitoring and measuring for gaseous odour emissions that they release into the community on a continuous basis.

We are very concerned that the applicant did not include on 019-2185 odorous wastewater compounds or derivatives similar or equivalent to those listed on the attached H2S Fact sheet and could be present.

We are also concerned that your office may not require that the applicant conduct dispersion modeling for any or all these odourous emissions using local wind and other meteorological data.

We believe that a significant number of residents will suffer adverse effects from this plant within a 2km radius and for that reason a study should be undertaken to learn what the odour dispersion is based on odour threshold.

Sanitary waste Pumped directly to process

The proponent may want to direct sanitary septic wastewater flow with solids to the process rather than to a weeping field. Does that change any emission?

We are also very concerned that the proponent will inventory sludge waste (digestate) on site in “compost piles” when his bins overflow or for some other reason. We know that the storage of compost material is regulated; the customers of sludge waste (digestate) consume at specific times of the year; that the consumption pattern does not match the production schedule. We estimate, using limited and inaccurate information from his ERO proposal and letter (dated June 21, 2021), that the applicant could ship annually for storage somewhere 219,000 tonnes of sludge (digestate). Has approval for a sludge storage facility been applied for by the applicant or another applicant? How many acres would be required?

Inherently Safer Process practices

Good engineering practices seeks to reduce the risk of odourous emissions by:

1. eliminating the causes of odorous emissions or
2. reducing the volume of materials that cause odourous emissions or
3. engineer a machine solution to contain odour emissions or
4. lastly control odourous emissions with operating practices (the last and most effective means of controlling odour emissions).

Has the proponent been asked to undertake an “Inherently Safer Process Best Practice Assessment?”

Should they?

Because

1. CH FOUR BIO GAS is scaling up their technology well beyond anything they have done before.
2. Their technology is in use by one company fined by the MECP.
3. To be operated by an Owner who has never operated a chemical plant
4. To be managed by an Owner who has little experience managing safety risks and process hazards.
5. To be managed by an Owner who has little to no experience managing the logistical challenges of managing between 73000 and 100000 transport moves annually?
6. To be managed by an Owner who has no experience injecting methane into a high-pressure gas main.

## **August 9, 2021 9:19 AM**

The more I research this matter, the more concerned I become at the environmental risks involved.

Traffic, risk of spills, risks of methane explosion or leakage, long term health effects of breathing methane, smell, noise - the list goes on and on.

This is prime residential waterfront and it risks serious contamination.

I had hoped to spend the rest of my life here in what has been a paradise. I foresee it being ruined.

There is a long history of methane production facilities creating horrible smells and being fined for doing so. Many of these operations seem to consider it as merely the cost of doing business.

There is a fact at Colville that already deals with compostable waste and is not in a residential area. Why was this site not considered.

This proposed facility is a direct threat to the environment.

Was not the ministry of the environment not consulted? Do they not realize that thousands of people could be affected?

Take note from the attached photo, taken at 2.00 pm yesterday, that there was no reason for anyone to know that the plant had been sold nor that there was going to be an environmental risk.

I intend to Audit the council meeting tonight.

## **August 9, 2021 3:58 PM**

I am responding to a letter left on my doorstep July 23,2021 by Donald Duncan of H and D Properties Ltd.

It was in regards to the proposed construction and operation of an anaerobic digester at 1336 County Road 2 Augusta, ON. I would like to note that the letter I received from Mr. Duncan was dated June 21,2021 but I received said letter on July 23, 2021.

To my knowledge, 1336 County Road 2 Augusta ON was a PraxAir facility until July 23 2021 when I received the letter from Donald Duncan stating his intent. I have attached a picture of my family taken today August 9, 2021 with the existing PraxAir sign.

I am extremely concerned for the safety of my young family as we live so close. When we purchased our home on the idyllic St Lawrence River 6 yrs ago, there was no mention of a waste disposal site in the Augusta Township zoning at the proposed address.

I am extremely concerned with the credentials and competency of Donald Duncan to construct and operate a facility of this scale.

Here are the impacts to our community that worry me.

1. Odour
2. Risk of fire and explosion
3. Contamination of our drinking water from our well and soil
  - Runoff to the St Lawrence River with Hazards to our family dog and local wildlife
4. Traffic impact
  - road repair from increased heavy truck volume
  - Accidents of spills and collisions (same route as our childrens school bus)
5. Decreased value of my home.

I am extremely concerned that no level of government felt it necessary to inform me as a resident of Augusta Township of such a facility.



I am extremely concerned of the destructive and irrevocable harm to the environment and the quality of life in my community.

I believe the first priority of good governance should be the safety and well being of its citizens.

## **August 10, 2021 8:32 AM**

Hi: I am a home owner of 21 years at (address removed).

I received your letter on July 21/2021, dated June 21/2021.

I am very familiar with the type of project you are proposing as my brother-in-law was heavily involved in a setting up a similar project in the Caribbean.

Your proposal leaves me with many questions.

What is the expected transport volume on County Road 2? What specifically is the organic material they will carry?

What strategy will be used to measure the methane that is escaping outside the containment?

What safety measures will be in place for an emergency situation involving an unexpected release of methane gas. How will this safety protocol be tested and monitored? Will there be safety drills?

On a side note why is the Proxaire sign still up? Why is your notice not on letterhead? Why is there no information on line about your company?

Looking very forward to hearing from you.

## **August 10, 2021 8:36 AM**

There must be something terribly flawed if the list of chronic complaints from Ontario BioGas producers grows daily.

The victims continue to complain about the same adverse effects from fugitive emissions; but once built and operating they have no recourse.

Communities are being hurt by fugitive emissions and I ask respectfully, how can a thorough MECP process fail to assess and mitigate against the emission sources that are causing them irreconcilable harm and adverse effects?

In my humble opinion, I would suggest that

- 1) emission source disclosure or dispersions modeling is inadequate or understated for decomposing waste materials and or
- 2) mitigation equipment effective performance and useful life is overstated and or
- 3) The industry has an over-reliance on procedure vs technology

It is also our opinion that the typical Planner in their role is incapable of assessing industry specific siting risks. We believe that when the MECP approves an application that the Planner sees the approval as validation for his/her planning zone compatibility test specifically, regarding the influence area of a facility. Does the MECP not have a duty to assess and inform in this regard? Specifically:

- 1) We encourage planners to review fines and complaints found at this MECP Website.
- 2) Dispersion modeling undertaken by “x” for “y” suggests that this facility will have an area of influence of “x” kms.

Mr. Keyvani, we have undertaken dispersion modeling. Our modeling shows that an emission plume of H<sub>2</sub>S will create “notable discomfort” after just 10 minutes for anyone “outside and downwind” within 1.5 km of Mr. Duncan’s plant.

That is concerning because we based our modeling on one anaerobic digester and not three. We used H<sub>2</sub>S because we cannot find data on the products of decomposing waste, the likely source of stink and fugitive emissions in neighborhoods. Mr. Duncan should be required to model the scenario: open door and bay full of 40k kg of decomposing waste.

I am so concerned about this that I will be informing neighbors within 2 km of this plant. I have also cc’d Mayor Doug Malanka of Augusta Twp.

## **August 10, 2021 10:28 AM**

Yesterday we received a copy of the Traffic Study that was completed as part of H&D Properties’ application/proposal to the Ministry.

There are several errors in the report.

1. The property address on the report cover is stated as 1332, it is 1336. (Screenshot of report cover and a photo of actual municipal signage below)
2. The report says there are bike lanes/paved shoulders on that stretch of County Road 2. There are not (photos of both shoulders follow).
3. The report says there is a 401 interchange at Blue Church Road. There is not.

4. Figure 2 of the report describes the surrounding areas and their land use but does not include the residential strip development all along County Road 2 as Residential (the current zoning).
5. The proposed traffic volume, does not take into account round trips. So all of the figures would need to be doubled – trucks go in and then back out.
6. I'm concerned that the traffic study was done in February, 2021. First off, this is the Waterfront Trail, a very busy tourism road in the summer, but not in February. Secondly, any statistics taken during the pandemic are not reflective of the traffic during 'normal' times. I don't believe their 1.2 pandemic adjustment is adequate. The road was quite quiet at that time other than commercial traffic. Also, looking at the historic weather data on Environment Canada, it reports 2 degrees celsius and 2.1 mm of precipitation. The afternoon traffic counter reports some rain (the morning counter did not note the weather after the first hour of his shift so we don't know when the rain started) but if there was a chance of freezing rain in the forecast, was that a reason for people to stay off the roads?

These kind of errors are misleading to the officials reviewing the application and show poor quality control (or questionable integrity).

## **August 10, 2021 6:40 PM**

I received the detailed permit information today.

I went to the odour control and management plan immediately.

Fugitive Emission escape routes undocumented: the document suggest that putrescible "solid" waste is tipped/dumped onto the floor of the reception room. The document says it could be staged there for 24 hours.

The assumption is the building general ventilation system will vent fumes; the air curtain and quick acting door (auto?) will prevent fugitive emission escape. It won't work as well as they think.

Page 3 In order to mitigate odours within the Reception Building several steps are taken, these include the following items: • Putrescible organics delivered to the building are treated within 24 hours.

The design basis is flawed because it is dependent on general ventilation when it should be contained waste inventory and localized ventilation!!!!:

The presence of a truck in the bay will short circuit the air curtain. (not ok)

The truck will displace building air (ok if door shut, not ok if door opened) .

The truck engine cooling fans, brakes, and exhaust as it backs in and drives out will disturb the fumes surrounding the staged pile of putrescible “solid” waste. (not ok: heavier than air, pushed away from general ventilation and out below the transport)

The act of tipping and dumping a transport will displace a large volume of building air laden with fugitive emissions following the truck out the door. (not ok: should be contained in dump bins)

Is the building designed to accommodate 2.5 Length Transports??

A better solution? Dumping should occur inside concrete walled rows or bins with dedicated “local hood type ventilation and filtration”.

4.1 Community Norms and Baseline Conditions The facility is located on land that is zoned for industrial use and is located in an area containing a mix of industrial, agricultural and residential land use and as such there are currently odours associated with farming and industrial activities that are part of baseline odour conditions at certain times of the year.

The reality is quite different than this statement. The reality should be measured using an approved method and documented just like the traffic study. The air here is clean and fresh, free of any industrial odours for 360 days a year. There is a period early in the spring when nitrogen or other fertilizer is spread on the field adjacent to the proposed facility and it dwindles to no odour in less than for 5 days.

## **August 10, 2021 9:59 PM**

Mr Duncan, Mr Strehler, Ms. Fraser, Ms. Allen

My name is (name removed). I live at (address removed) and have for 21 years.

I am a retired (information identifying commenter removed). During my career I built and operated manufacturing plants, safely and in compliance. I was audited by external regulators many times. I have created FD's, PID's and sought MECP permit approval. I have managed the complexities of maintenance, JIT, unions, HR, Inherently Safer Processes and Lean Mfg. More than anything else I took PSM very seriously.

Then came the letter from Mr. Duncan on or around July 23rd. I did the math and quickly realized that this was far from a good news announcement.

Here is the problem:

The air here is clean and fresh for 365 days of the year with some agricultural smell in early spring when they prep the fields. There are no industrial odours.

Last year the wind blew across your property in my direction and into my yard for 1925 hours. It never smelled. The problem is I expect you to perform no better and no worse than any other BioGas AD installed in Ontario meaning, I will be sheltering in my house for 1925 hours next year, lodging complaints with the MECP and Township over the stink.

Many residents are upset, fearing irrevocable harm from the adverse effects of this plant discharging fugitive emissions and inundating residential properties with the stink of decomposing waste. The cause: an open door, failure to maintain a filter or interlock, no procedure, who really knows it still stinks. We would have soon tired of the "Odour Control Protocol" and just called the MECP.

I just received your submission documents from the MECP which are publicly available.

So far, I cannot find any evidence that your plant or management processes are designed to fail safe: no fugitive emissions can occur because the process fails closed.

For example, under Odour Management there is a phrase, "Page 3 In order to mitigate odours within the Reception Building several steps are taken, these include the following items: • Putrescible organics delivered to the building are treated within 24 hours.", does that mean treatment causes odours if not undertaken within 24 hrs, or untreated putrescible wastes will in 24 hours overcome the building ventilation system? What I think it says is that you plan to leave 20 to 40k kgs of decomposing organics on the floor, uncontained with no local ventilation or blanketing expecting building general ventilation to vent the fumes. You can't come close to a fail-safe outcome if you don't contain and ventilate locally.

I would highly recommend that you hold a public meeting with the community and explain what makes you different?

If you, do you should be aware that in the room there will be at least three SR Chemical Engineers, one SR Environmental Engineer, a Ground Water Consultant, two maybe three plant managers and a few disgruntled but respectful neighbors. All I might add are residents of this neighborhood.

I have been in your position; excited about building a plant. But you should know I oppose siting this plant in my neighborhood because of the failures in London, Grimsby, Georgian Bluffs and Chatsworth, North Stormont and more.

## **August 11, 2021 9:19 AM**

On August 10th I received the submission file #4226-BQTPB5 from the MECP.

I have reviewed some parts of two documents and would share these concerns.

From Design and Op Report May 26, 2020

“The facility is located at Lot 1336, 1336 County Road 2 in Maitland, Ontario (44°39'6.8616"N 75°35'34.9872"W). The prevailing wind is from the south and west of the facility; wind flow is generally up the St. Lawrence River.”

“The surrounding area contains similar topography and is a mix of industrial, agricultural and residential zoning. The site is on a septic system and there is one well on-site (both indicated on Site Plan drawing)”

“When a delivery is brought to the Receiving Building, one of two large bay doors will open and an air curtain will engage and the truck backs up into the room. The bay doors are closed except for when a truck is entering or exiting the building. Trucks are washed down in the Receiving Building prior to exiting the building. Wash water is drained into the 40 m<sup>3</sup> Liquid Receiving Tank for processing in the anaerobic digester system”

My Issues:

- the Lot number is not Lot 1336.
- The concept of “prevailing wind and generally flows” are subjective terms that have little to no meaning beyond understating the accurate assessment of wind flows. In fact, in 2020 the wind blew across the site toward residential zones for 5133 hours or 59% of the time and that is 18% more than the “prevailing wind”. Wind direction and speed is crucial when understanding fugitive emission spread and impacts on residents.
- “Contains similar topography” what does that mean? Is topography important or not? I believe that the site topography of this location is crucial to the understanding of risks to the environment. The site and surrounding properties should be described in topographical terms or not at all. At a minimum, this submission should have been made following a “Hydrogeological and Terrain Study”: undertaken by the South Nation Conservation Authority.
- “one well on-site” what does that mean? Is it a well for potable water, a well for service water, an artesian well, a disposal well used by the previous owner for the disposal of condensate? Is adequate protection of ground water existing or proposed. Maybe I will learn more as I read on.
- Delivery: I do not believe that the mitigation systems proposed will capture the fumes from decomposing wastes in this building or at others in Ontario. Has this very plausible worst-case scenario been considered using an FMEA: a truck is dumping; a truck is leaving; there is “X k kg” of decomposing waste on the “broadcast floor” being worked with a backhoe; the wind is blowing across one or two open doors (in 2020 it

blew across the doors for 3200 hrs). We believe air curtains and building negative pressure mitigation will be compromised. Will fumes exit the building?

- SOH AEGL: the receiving building will not be pleasant to work in. Are there no exposure standards such as H2S AEGL that apply? Should there be? Should an appropriate AEGL govern the design of ventilation and containment?
- Why are truck loads of this material not contained in bunkers with LOCAL VENTILATION inside the building in addition to the mitigation methods proposed by the Owner? Would that help?
- Why is the inside of the building not treated like a closed process vessel? Should it?

From Odour Management Plan

4.1 Community Norms and Baseline Conditions The facility is located on land that is zoned for industrial use and is in an area containing a mix of industrial, agricultural and residential land use and as such there are currently odours associated with farming and industrial activities that are part of baseline odour conditions at certain times of the year

My Issues:

- I take issue with the inaccurate subjective description of the baseline air quality. The author suggests that it smells industrial and agricultural at certain times.
- The baseline air quality can be measured using approved methods. If accurate baselining data is not referenced, then generalizations like this should be challenged by the MECP.
- Without an accurate baseline what do you have to measure a complaint against? How can we argue what's new vs what existed? This statement suggests that the area at times smells already.
- The fact is there are 3-5 days per year when I smell on my property the organic treatments used by a local farmer, otherwise there are zero industrial odours just fresh air regardless of wind direction or speed.

I plan to comment further. I am asking questions or making comments, respectfully and to the best of my knowledge with the intention of minimizing harm to all stakeholders.

I also appreciate that Mr. Duncan, Ms. Fraser and Mr. Strehler have been forthcoming with information.

**August 12, 2021 1:42 PM**

August 12, 2021

Cc: Claire Allen, Benjamin Strehler, Don Duncan, Mary Fraser, Doug Malanka

Dear Mr. Keyvani

Re: 1336 County Rd 2 Are residential complaints related to Missing Odorous Emissions and Baseline Data Assumptions?

I am sharing this note with CH Four and, H and D Holdings; they have been open by sharing information with me. I appreciate that! My beef is not with them but with the industry and its failure to contain fumes.

This type of facility is a chronic source of complaint in regions where they operate. CH Four technology may be different, but I suspect not.

I have offered some ideas that if given due consideration might just help everyone avoid some aggravation.

I would respectfully suggest that:

- 1) There are more than just Four Potential Odour Sources, and the others are the source of fugitive emissions at open doors in particular; and air curtains do not work.
- 2) The Stack Discharge target of 2000 OU is twice what it should be: there is no fail-safe operating range identified?
- 3) Anytime putrescible organic waste on the floor or in the process is "open to atmosphere" those points should be serviced with LOCAL exhaust hoods and a dedicated fume hood ventilation system with containment.

The Floor Diagram and Operational description suggest these are important sources of fumes:

- Truck full/empty unwashed containing putrescible organic waste >4500 OU ?
- Broadcast Floor dumped inventory of putrescible organic waste >4500 OU ?
- Open vessels such as Separators filled with putrescible organic waste >4500 OU ?
- Backhoe Payloader buckets/tires contaminated with putrescible organic waste >4500 OU ?
- Wash Water contaminated with putrescible organic waste >1500 OU ?
- Exhaust ducts and systems contaminated with putrescible organic waste condensate > 4500 OU ?
- Building Walls and structures contaminated.

I do not know what the actual OU of 40k kg "putrescible organic waste" is, but it is likely high.

**August 12, 2021 2:39 PM**

To: Ben, Claire, Mary, and Don

For your awareness and consideration:

Some members of the community, including me, have no reason to believe that CH Four BIOGAS technology operated by Mr. Duncan, will perform any better than any other BIOGAS AD facility



currently in operation in Ontario.

As much as we try, we can find only one installation in Ontario that has not been the source of chronic complaints and ministry fines.

That installation is [BIO-EN POWER INC.](#) Bio-En Power operating in Elmira. The MECP held them up as a “good installation” since they have had the fewest complaints. Perhaps its because the site is the company’s flagship R&D and Sales Facility.

Perhaps they have very effective containment? Perhaps they process different wastes? Perhaps they use fume hoods? I do not know.

If you know of any “good neighbor stories”, please forward and I will gladly share with residents.

In the meantime, attached are articles that neighbors have sent me.

[Environment ministry slaps London waste plant with 11 charges | London Free Press \(lfpres.com\)](#)

Advanced Waste Solutions CH Four BioGas Technology was in use by ***Kirchmeier Renergy Inc.***

[Kirchmeier Farms - CH Four Biogas](#)

## **August 13, 2021 7:51 AM**

Re: Misleading Information Supplied to the MECP may have also been used for traffic studies and discussions with township officials.

ERO # 019-2185 (land) and ERO # 019-2772 (air) Documents obtained through MECP ref # 4266-BQTPB5

Dear Mr. Keyvani

I am concerned that information supplied to the MECP was also shared with other officials or regulators.

Insignificant errors in a submission to the MECP are tolerable.

But in this case the proponent clearly states that the daily waste digestate production of 540 cubic meters will be “pumped to Dyno Nobel via pipeline or loaded on a truck” and confirms in truck count tables submitted that there will be zero trucked digestate waste leaving the site: therefore, I conclude that the digestate must be going to Dyno Nobel.

The problem:

1. Dyno Nobel without their knowledge were identified as a destination for the daily production of 540M3 of digestate waste: CH4 drawing G3 and noted in Design and Op Report May 26 2020, sections 3.3 and 3.4.

2. Dyno Nobel were not given a copy of Mr. Duncan's letter of June 21, 2021.
3. H and D Properties may have been told before the submission that Dyno Nobel would not take this feed; perhaps as early as 2018.
4. That planners at Augusta Twp, Leeds County including the County Road Engineer undertook their assessments with false or incomplete information.
5. The truck traffic number count submitted does not include an outbound digestate waste traffic of a minimum of 21.6 trucks per day (bulk density of sludge is 800kg/ cubic meter).: see extracts from Design and Op Report May 26 2020

Significance:

1. Planning: Augusta Township officials, may have endorsed this project because it was close coupled to another manufacturer in the industrial park.
2. Leeds County Planner and Roads Engineer received a Traffic Study that did not include outbound digestate waste trucks. They seemingly endorsed the project and made or could have made entrance recommendations based on a false traffic count.
3. The truck count impact is lower than stated and does not address impact on residents on two county roads and intersections along the route: for every truck inbound full there is an outbound empty and vice versa.

Notification: The Dyno Noble site manager was notified by me on August 12, 2021, that they were named on an MECP application. The Leeds County Planner who had endorsed the traffic study was informed by me on August 12, 2021.

CH Four biogas submission documents state:

- "3.3 Site Storage of Digestate Products

There will approximately 540 m<sup>3</sup> of liquid digestate produced on a daily basis. Digestate will be pumped to liquid storage tanks at Dyno Nobel (the neighbour facility) or removed directly from the digester via cam[1]lock connection into closed liquid trucks for export from the facility. On-site removal of digestate can occur within the Reception Building or directly at the anaerobic digesters (if required). In the unlikely event that digestate cannot be pumped or removed directly from the AD, each anaerobic digester tank can provide approximately 2 days of digestate storage."

- On a submitted drawing “G3 Mass Flow Preliminary Design” they show flow 3 to Dyno Nobel.
- 3.4 Truck Traffic to Site

The facility is located at what was previously a Praxair Dry Ice Facility and the surrounding area is a mix of industrial, agricultural and residential. It is anticipated that the increase in truck traffic will have minimal impact on the community. A Traffic Impact Study (TIS) will be conducted to meet Site Plan Approval requirements set by the Township of Augusta. The trucks coming and leaving the site will travel on Highway 2 for a short distance before traveling north to Highway 401. Given the area is zoned for industrial use, it is not anticipated that the increased truck traffic will cause a nuisance. Prescott Anaerobic Digester Facility Design and Operation Report 7 The daily truck and employee traffic has been predicted based on the plant operation capacity and process details described in the present document. The table below details traffic to the site, assuming the use of 20-25 tonne trucks being used for deliveries. Table 1: Truck Traffic to Facility Trucks – Incoming substrate 27-34 trucks/day (average for 6 days/week) Trucks – Outgoing Inorganics Contamination and Waste 1 truck/day Employee Traffic 4 cars/shift, 2 shifts per day Other – Deliveries/Utilities/maintenance 1-2 vans or trucks/week (average on irregular basis

To the best of my knowledge there has been no attempt to correct this misinformation using proper transmittal letters to all interested parties.

## **August 17, 2021 9:06 PM**

Much protest has recently evolved because of the proposed building of an anaerobic digestion plant in Maitland at the site of the disused Praxair plant which used to produce dry ice and carbon dioxide gas.

Whilst there are undisputable benefits to be gained from the process, it is equally undisputable that there is an appallingly bad track record for these plants when built anywhere in the vicinity of residential housing. Promises are always made ahead of time that there will be no odors or escape of pollutants, these promises have been meaningless. Stenches from these facilities have made living conditions in residential areas unbearable, and there are numerous cases of fines being levied for infractions. These fines do not reverse the damage that has been done. This is a classic case of shutting the stable door after the horse is gone.

Anaerobic digestion facilities should be constructed far from residential areas and, even at that, there must be tight controls on possible gaseous or liquid release.

As most are aware, methane gas CH<sub>4</sub> is a simple hydrocarbon that is the prime component in natural gas. Natural gas is much used as a fuel. Methane is produced in nature, but modern agriculture, in particular cattle farming, has doubled the atmospheric percentage since the industrial revolution. Atmospherically, methane is eighty-four times worse than carbon dioxide as a greenhouse gas. A lot of attention has focused on carbon dioxide as the culprit for global warming, but this is fallacious. Trees absorb carbon dioxide, but do not absorb methane, which is far worse. Methane poses various hazards. It is highly inflammable, explosive and, as amount breathed increases, it becomes a severe health hazard. Even comparatively small leakages into the atmosphere should be avoided.

That said, methane itself is not the main environmental problem. It is also extremely useful as a non-polluting fuel.

The problem lies with the stench that anaerobic digestion involves and the virtual impossibility of controlling this entirely. The breakdown of organic material produces many compounds other than methane. The worst, and most putrid, smell comes from hydrogen sulphide H<sub>2</sub>S, also called sewer gas, which is a colorless gas known for its pungent "rotten egg" odor at even low concentrations. It is extremely flammable and highly toxic. At low levels, hydrogen sulfide causes irritation of the eyes, nose, and throat. Moderate levels can cause headache, dizziness, nausea, and vomiting, as well as coughing and difficulty in breathing. Higher levels can cause shock, convulsions, coma, and death.

Hydrogen sulfide is heavier than air and may travel along the ground. It collects in low-lying and enclosed, poorly ventilated areas such as basements, manholes, sewer lines, under-ground telephone vaults and manure pits. Even if high stacks are constructed to blow the gasses into the atmosphere, the H<sub>2</sub>S will sink towards the ground and in conditions of calm or light winds will be immediately objectionable.

All the waste to be shipped in for anaerobic digestion is to be trucked in. All remaining matter must then be trucked out. The incoming material and the outgoing remainder will both stink. It is unrealistic to suggest that all this unloading, processing, and reloading of waste can be accomplished with no noticeable odor escape. This is always promised, but the long track record of failure indicates that these promises are not kept. The increase in traffic noise will be great and will be ongoing 24/7. If only one truck is involved in an accident and rolls over, the consequences are unthinkable. With literally hundreds of extra trucks coming and going, the risk of accident is high. The Maitland Road and County Rd 2 are not suited to that traffic volume. The location of the property is on a tight curve on #2 and there does not appear to be sufficient room to put in a turning lane, thus adding to congestion and the probability of accident.

As to the proposed plant in Maitland, I would suggest that we have been deliberately uninformed, misinformed and possibly deceived. Although the Praxair Plant was, I am told, sold two years ago, the sign for Praxair today remains in place giving the impression that dry ice is still being produced there. The new owner had an obligation to remove or cover the sign but did not do so. One is forced to ask - why the deception? The first any of the local area residents knew of any of this was a brief visit from Mr. Duncan, letting us know that he had been instructed to tell residents what he was doing. This was only a few weeks ago. He propounded the supposed advantages to the area and made it all sound very "green".

A short distance from the proposed plant flows the St. Lawrence River. In addition to being a major shipping channel, it is also a playground for swimmers and boaters. Once again, one must consider the risk of pollution.

I am not for one moment decrying advantages that can be gained from the anaerobic digestion process for methane fuel production. What I, and hundreds of others are saying is that siting it in a residential area, as proposed, has far too many risks and disadvantages.

Many days of research on the internet have all produced information that backs up what I have written. I could attach a great many links to these sites, but that would likely achieve little as you can find them as easily as I did. Figures on odor units and what are deemed "acceptable" limits are all there to read and analyze.

This area is not zoned for this activity, and it is essential that a full investigation of all health, social, environmental, potential decline of property values and other consequences be taken before anything further happens.

On a personal basis, my wife, Patricia, and I have lived here for twenty-two years. We love our home, and everything we have in the world is invested in it. We live on my one teacher's pension and a few savings. We cannot afford to see our home drastically devalued and our having the necessity to move. The residents in this area feel as we do, and it is unthinkable that one company could potentially disrupt so many lives. Residential victim in such places as London, Grimsby, Georgian Bluffs, Chatsworth, North Stormont and many other places would be quick to endorse what I have said. Life became unbearable for many of them.

**August 19, 2021 9:07 AM**

To: Mr. Mohsen Keyvani; Director, Waste Management Branch MECP

From: (name removed)

Re File #4226-BQTPB5 ERO 019-2185 and 2772 1336 County Rd 2

Dear Sir,

I obtained and reviewed the application submission documents from the MECP.

The CH Four submission dwg "G3" clearly shows the Anaerobic Digesters close coupled to a neighboring plant. **Is this true?**

Assessments undertaken by the applicant are consistent with a close coupled arrangement.

The Traffic Study, EDSM and Odour Emissions studies also show no outbound traffic and zero impact from digestate truck filling. If Digestate Truck filling is required, at 30 trucks per day filling could release as much as 23500 scf/hr of air laden with digester fumes and odours.

The documentation also shows little in terms of the methane disposition beyond "injected into the local grid". I checked with the owner of the "local grid", and they have no knowledge of this project. The Twp Planner on the other hand stated in a letter to a resident "The Industrial Park zoning allows for such uses as biofuel depots"

As a resident I want to know if the applicant has approval to connect to the NG grid at an approved Tie-Point and under what standards and controls, or will methane be dispensed as a fuel for inbound/outbound transports and or trucked off site in fuel tankers and under what standards and controls. In either case emission controls and containment must be proposed and assessed by agencies and regulators, and the traffic impact on our neighbourhood analyzed using accurate information.

I am very concerned that agencies and planners are acting on information that is misleading.

**August 22, 2021 9:39 AM**

Dear sirs,

I am confused. Maybe location does not matter.

I have seen four different locations on officially submitted documentation for this project.

1332 County Road 2: Traffic Study

Prescott 1300 Brockchem Road, Prescott ON: MECP Application FD

Prescott Anaerobic Digester Project Title Block: MECPP Application

Prescott 1336 County rd 2 Maitland ON: MECP Application Site Plan

Since some drawings including site plans and flow diagrams are shown as preliminary or draft perhaps, they have yet to decide where the waste disposal site will go!

I chose Prescott.

## **August 27, 2021 10:37 PM**

Has the proposed site had a current environmental/water assessment? ie are there any contaminants in and around the property that would be hazardous currently and should the site be disrupted? Should there not be a water assessment to develop a baseline no matter what else takes place?

This would seem prudent.

## **August 30, 2021 10:36 AM**

To: Mohsen Keyvani

From: (name removed)

Re: Odour Concerns from 1336 County Rd 2, Maitland

We checked out CH Four locations in the USA and BC that they offered as locations without complaints or with 1 complaint. Seabreeze BC is 2 km away from residential areas in a farm setting: Vanguard USA operations such as Rutland are small and located in the middle of farm country surrounded by manure lagoons or extensive treelines.

FYI there are approximately 250 homes within a 2km radius of 1336 County rd 2 and many more that can be affected by odourous fumes if they reach the St Lawrence River just 425 M east of the proposal. West winds blow 25% of the time.

Putrescible Waste: The proponent shows a concentration of 2000 OU/? discharged from OP1. Air with contaminates discharge rate out the stack of 13,592 m3 /hr.

Is this right given an emission rate from all wetted surfaces??

Attached is an article describing a measured value of "landfilled putrescible wastes" used by PAE Holmes for a report on a similar receiving building.

What is the worst-case scenario: doors open and systems down from a power outage, truck just dumped waste? H2S and or Putrescible Waste?

Why is there no modelling baseline showing the outcome from the odour emitted from the waste stockpile inside the building as an area source emitting continuously for the modelling period without the building enclosure and fume abatement?

I am concerned that

- 1) OP1 2000 OU is low and does not include a sufficient safety factor of 100% given "C" above.
- 2) There is not a baseline Worst Case for item "C" above: all systems down, doors open, and waste just dumped: the knowledgeable person in charge should know what this means to neighbors!
- 3) The Air curtains will not draw fresh air from outside, rather the air curtains will use inside odourous air.
- 4) Digestate truck loading outside will vent displaced air to the atmosphere (not accounted for??) The Ops document suggest that digestate tankers will be loaded inside the receiving building. Is there time and space for both dumping and filling to occur? Is the yard sized for more than 1 truck at a time?
- 5) Is the filter sized for this capacity since the document talks to digestate piping to Dyno Nobel???
- 6) That 10% of odours modelled are  $> 0.1$ ; the target should be 1% of odours modelled are  $> 0.1$ .....99% of the time odours do not exceed 0.1
- 7) That truck loading (digestate) and truck dumping (putrescible waste) are supposed to happen inside the receiving building? 50 to 60 trucks a day will soon overcome operations personnel leading to shortcuts.
- 8) Under these circumstances how does CH Four know that 2000 OU is a conservative number: CH Four and Duncan to the best of my knowledge have no experience managing odours on this scale of loading and dumping, and washdown?

I am not an odour or modelling expert so judge this accordingly.

I am a resident who remains concerned that this facility will stink like South London and most other Waste Disposal Sites handling putrescible wastes that are located too close to residential areas.

## **September 3, 2021 3:16:10 PM**

In reviewing the traffic study supplied by Mr Duncan there are many errors and misleading/incomplete information has been provided. This application should be delayed until a full and thorough traffic study is provided. Below I've highlighted the obvious issues in the report that cannot be ignored.



1. Location: the application is for 1332 when actual property is 1336 - if he can't get this right how do we trust anything submitted is accurate
2. Paved shoulders/bike lanes: the application states there are paved shoulders when there are not. Walking along and biking along hwy 2 between maitland and prescott is by far a dangerous proposition given the lack of paved shoulder, lack of clear line of sight etc. Adding more large truck traffic will only make this situation worse. During summer months HWY 2 -aka waterfront trail by its very nature is a heavily cycled route.
3. Interchange/entrance to 1336: - having a large volume of truck stopping/turning in and out of this location with very limited line of sight will present dangerous situations for local motorists or when tourists season picks up - a formula for death.
4. Surrounding residential area: - current submission ignores the fact of the significant residential area along HWY 2 near this location and not just in maitland.
5. Site Trip generation: This does not account for the fact trucks must enter and leave thereby doubling the amount of traffic in and out of this location. This equates to almost one truck entering or leaving every 15 minutes assuming equal distribution every hour of every day which is highly unlikely. Therefore during some periods of the day this frequency could be double or triple this. How did he compute this site's trip information (ie trucks coming)? This should be provided so accuracy can be checked. Given errors in this report, perhaps the real # are very much understated. What happens if this facility gets approval to expand... By then it's too late.
6. Interchanges with 401: there is NO 401 interchange at blue church
7. Daily traffic study information: this snapshot is at perhaps the slowest month in the slowest year for traffic on record due to covid restrictions. This report doesn't come close to traffic during summer months during tourist and summer camping season. This information is basically worthless and not representative of factual traffic patterns throughout the year. HWY 2 is a detour road for the 401. On many occasions even with covid last year HWY 2 was back to back with 401 detour traffic due to closures on the 401.
8. Access to HWY 2 from maitland: This study does not touch on the fact these trucks must cross the busiest rail line in Canada, then proceed down to HWY 2 via a severe downward slope to a stop sign. This will cause excessive noise from braking or truck engines working hard as they travel up the hill. Now add poor driving conditions during winter months and the risk for trucks to enter onto HWY 2 without stopping only increases dramatically. Will it take a major accident/death to realize this is not a good location for truck traffic?

## September 6, 2021 12:07 PM

To twp

I am confused and need your help.

- On September 25, 2018, the CAO of Augusta Twp: Mr. Ray Morrison provided Mr. Donald Duncan; D and R Drying Ltd, with a Zoning Official Plan Compliance Letter stating that the proposal to install anaerobic digesters at 1336 County Rd 2 located in an MP: Industrial Park zone, was allowed.
- In May 2020 Mr. Donald Duncan; H and D Properties Ltd applied to the Waste Management Branch of the MECP for “air” and “land” approval to build and operate a waste disposal site with anaerobic digesters at 1336 County rd 2. Approval is pending.
- In May 2020, then again in May and July 2021 at the request of the MECP and in accordance with the Environment Assessment Act and at the insistence of the Signing Director; Mr. Duncan notified neighbours of his intent.
- On August 9, 2021, you state in an email response to a resident, that “the Industrial Park zoning allows for the use biofuel depots and the production of any goods or substances to be established, as well as uses that are accessory to such industrial development.”
- The Augusta Township Planning website shares a link to the OMAFRA document that stipulates the Minimum Distance Separation (MDS) Document Formulae and Guidelines for Livestock Facility and Anaerobic Digester Odour Setbacks Publication 853.

Question 1:

Does the Zoning Official Plan Compliance Letter remain valid if the proposal submitted to the MECP differs from the proposal reviewed in 2018? Has this been checked and verified?

Question 2:

If the proponent makes an application for a “Waste Disposal Facility” to the Waste Management Branch of the MECP, with the intent of processing 600 tonnes of waste per day, inventory 11400 tonnes of waste on site per day and inventory 0 tonnes of biofuel on site, how can that be deemed a biofuel depot for zoning compliance?

Question 3:

If the proponent applies for a Waste Disposal Site approval and not a Biofuel depot approval would the township not consider it prudent to reassess the zoning compliance taking into consideration the Adverse Effects and Area of Influence prescribed by D-4 Land Use Near Landfills or Dumps item 5.4? Specifically, an Area of Influence of 3 km which encompasses the village of Maitland, county rd 15 subdivisions, the subdivision on the 2nd concession beyond the 401 and all residents in “residential waterfront”?

Question 4:

Does the OMAFRA document Publication 853 have any bearing on an Anaerobic Digester not located on a farm or agriculturally zoned lands?

Question 5:

If the proposal was determined a suitable industrial use, is there any documentation in the township planning office that shows that the planner gave any consideration of adverse effects on a residential zone within 1 km of the site, in accordance with D-6 Compatibility with Industrial Facilities? There are 32 homes in formally zoned “residential” within 1 km of the proposed site. There is also one institution: museum.

## **September 7, 2021 8:31 AM**

### Item 1

The Nutrient Management Act requires that agricultural operations hold 240 days of inventory of digestate or other nutrients in approved engineered structures.

Is title of the digestate transferred to Dyno Nobel if shipped to them via pipeline? Will they be responsible for the digestate?

Does the proponent have a plan to manage 240 days of digestate produced in his Anaerobic Digesters in compliance with Ontario reg 267.

I calculate that he would need 122 reservoirs to store wet digestate at 2 meters deep by 30 meters wide by 30 meters long. That would require a field 3km x3km not including road and service access.

I don't know how he plans to manage the logistics of receipt and delivery coincidental with agricultural cycles. This is another complex operation entirely requiring separate MECP approval.

Perhaps he plans to sell and deliver to regional farmers who will inventory the digestate till needed. If so, he will need to sell to 9700 farms who do not currently have their own supply of nutrients.

Perhaps he plans to sell to composters.

Perhaps he does not know?

## Item 2

Buildings: is the proposed broadcast floor and receiving area existing floor level at a loading dock height of 36 inches above grade or is a building addition proposed. The proponent shows transports backing into this space, but no mention of a building modification is made. If he plans to infill and raise the building approach, no mention of that is made either. Tank foundation details show no site infill etc. I am confused and concerned since infilling, if that is the choice, has an impact on the application.

## **September 7, 2021 10:18 AM**

I have sent you all emails around the concerns that I have and the concerns of 100's of residents have regarding a proposal by Donald Duncan of H & D Properties Ltd regarding the proposed construction and operation of a anaerobic digester facility at 1336 County Road 2, Maitland Ontario.

I vote conservative and now I would like to hear from you Michael and Steve that you have brought yourselves up to speed on this issue impacting many of your constituents and how you plan to help.

I would like to know Mohsen whether the MOE has done their full due diligence on this proposal before green lighting it.

I am aware of the new funding grants available by the Ministry of the Environment for proposals to develop clean fuels. The timing of your plan to produce BioGas and fertilizer would fall under this opportunity.

I do not have a concern around Biogas production as this is supported by the Ministry of the Environment. I do however have concerns with his proposal as outlined. Please see my comments below:

- A) Background and experience to construct and operate a safe business to ensure our community is protected
  1. Mr. Duncan did not provide any background or experience to assure us that he knows what he is doing and could construct and operate an efficient and safe Facility.
  2. I did not find Mr. Duncan listed on the Canadian Biogas Association web site as members.

3. I did not find H & D Properties Ltd listed on the Canadian Biogas Association web site as a member.
4. I have seen Mr Duncan's submission to the Ministry of the Environment and it is filled with misinformation and false statements. He is full misrepresenting his impact and operational plan.

B) Location of Proposed Facility

1. I have concerns that there will be odor impacting the enjoyment use of our properties located on the historic St Lawrence River. This has been proven by the residents of other Biogas facilities and numerous court cases.
2. I have concerns that there will be a noise and high volume trucking impact from the facility that will impact our enjoyment use of our property
3. I have concerns that there could be a potential leak and seeping into the water table leading into the St Lawrence river from this facility. Even safe designs fail or are compromised over time if not cared for. Mr Duncan has done nothing to have us believe he will properly look after this facility.

C) Traffic and Trucking

1. I have concerns that he identified a 24hr x 7days x 365 day a year operation with 600 tonnes of non-hazardous waste or up to 600 cubic meters of liquid non-hazardous waste per day. This is a huge volume of trucking and impact in our small village and along the historic County Road 2.
2. This is way too many trucks travelling on Hwy 2 with the potential for accidents.
3. This is way too many trucks traveling in this area with joggers, cyclist and sight seeing people traveling up and down the historic St Lawrence River Hwy 2.
4. The congestion and noise of all these trucks is not acceptable. The potential for more increased crashes, injuries and trucking accidents leading to spills and leaks is too great.
5. I am concerned that the plan is to take waste from all of Ontario and all of Quebec. That is a very large operation. When reviewing other Biogas sites, they work locally with farms etc and operate smaller facilities. This a major enterprise. Too big for our small area.

D) Impact to the Environment

1. I would require a copy of the Environmental Impact Assessment outlining at a minimum the following areas to even start to consider that this company knows what they are doing and have our interest, our health and our lands protected.
  - a. Impact on the air quality,
  - b. Potential for soil Contamination
  - c. Water table impact and contamination
  - d. Potential of effluent reaching The St Lawrence River
  - e. Traffic and road repair due to increased heavy trucks
  - f. Land value impact due to this facility

## **September 9, 2021 2:54 PM**

Thanks for the clarity and contacts.

I do have another question: does the fact that DuPont operated a landfill from 1955 to 2013 set a precedent? Meaning if a company did it then its ok now for another company to handle and process a larger volume of garbage from outside the township and province, in Augusta Township? Is that what we want?

Currently, I have no questions of Mr. Duncan so meeting with him would be a bit of a waste for each of us. I have submitted comments to the MECP after reviewing the submission documents as requested by Mr. Duncan in a notification letter, I received from him.

## **September 10, 2021 12:52 PM**

I discovered through a review of the documents prepared by CH Four Biogas and submitted by H and D Properties that the proponent clearly shows Dyno Nobel as the primary destination of digestate. CH Four BioGas detail this on the flow diagrams, the Operations Report, and the Traffic Study.

That's strange because Dyno Nobel had no knowledge of this.

Shortly after he made his submission to the MECP, Mr. Duncan took a notification letter dated May 20, 2020, to the Site Manger of Dyno Nobel and had her sign it. Pipeline and tanks were never discussed.

When I got my letter from Mr. Duncan on or about July 21, 2021, I met with the Dyno Nobel Site Manager; Sandra Kinghorn, to let her know that this plant was proposed. At

that time the Site Manager told me that Duncan had approached Dyno Nobel years earlier about pipelines and tanks, but she told him that Dyno Nobel would not participate.

I returned to Dyno Nobel after reviewing the Flow Diagrams and Reports and let the Site Manager know that they were implicated in the application by the proponent. She was livid and has acted through Dyno Nobel legal. She is also notifying Augusta Township, CH Four Biogas, and others.

Others have acted on this information in good faith. What does the MECP think about this? Does the following not apply?

False information

34 No person shall knowingly give false information in any application, return or statement made to the Minister, the Tribunal, an employee or appointee of the Tribunal, a provincial officer or any employee in the Ministry in respect of any matter under this Act or the regulations. R.S.O. 1990, c. E.18, s. 34; 2000, c. 26, Sched. F, s. 11 (6); 2006, c. 35, Sched. C, s. 34 (3).

I also would point out that Mr. Duncan does not state anywhere in the application how he intends to dispose of digestate beyond, "pipe to tanks at Dyno Nobel" and then to "farmer's fields". Would the proponent not be obligated to store 240 days of digestate inventory in compliance with Reg 267. If so, that is a very large storage lagoon? Would he not need farmers? If so, he needs more than 9000.

There is no way that we can trust an individual or company that behaves in an underhanded manner.

## **September 11, 2021 3:02 PM**

I am writing to you in regard to the waste treatment site proposed for the old praxair site on highway two. My family are 900 metres from this address and are very concerned this will become a reality. We have lived in this area for six years. We moved from Ottawa as we fell in love and imagined raising our children and retirement

Hello Mr. Keyvani I apologize for sending an unfinished email. The concerns I was stating and the impacts I believe that will affect the residents are. I have researched the other digesters in Ontario and the complaints of unacceptable odours that severely impact life of those residents. To my knowledge those escaping odours happen regularly and are not contained. The amount of heavy truck traffic passing through neighborhoods around the clock have another list of impacts. Noise and heavy pollutants not to mention accidents and road degradation. My children travel this route in there school bus. I have spent the last six years upgrading my home and property.

My wife and I planned on retiring here and hoping that our home would be passed on to our daughters in hope they would stay in this community.

I feel that if this facility is built we will have to leave at a great financial and emotional cost. My children will be uprooted from their school and friends. I find it very perplexing that an area with this many residents and so close to one of the world's most picturesque and important waterways is even being considered. Ontario is a large province surely there is a more suitable location. I truly hope that the health and well-being of area residents is the first priority for the government of Ontario. I am not opposed to development and the creation of jobs. My wife and I are blue collar hardworking people ourselves. I just feel that this facility is not compatible with this area. I thank you for taking our concerns into account. I apologize for sending this on a weekend but I could not find time during the week.

**September 12, 2021 8:52 AM**

Dear Sir,

I obtained a copy of the H and D Properties application from the MECP through Freedom of Information. I have reviewed that in detail and responded in writing to the MECP as requested by the proponent.

The following is a very serious finding because it understates and misrepresents the odours, noise and traffic effects that this plant will have in the Village of Maitland and my neighborhood.

I reviewed the application **Emission Information** supplied by CH Four Biogas and could find no mention of **540,000 kgs of digestate truck loading vented gas**. There is an "or" statement that mentions truck loading at or near the receiving building. This does not excuse the fact that the drawing "SP1" also shows Dyno Nobel as the receiver of this material. I can only surmise that the applicant is indeed seeking approval as drawn and noted based on a business relationship that never existed between H and D Properties and Dyno Nobel.

The proponent was told by the Dyno Nobel Site Manager long before engineering started that they would not do business with him. He also had ample opportunity to confirm or correct his plans with Dyno Nobel even on the day in May 2020 when he asked the same Site Manager to sign his "neighbour notification" letter. Did he?

The traffic study, the operations report, the odour emissions report, the leachate report, and conclusions are based on the false claim that digestate would be pumped to Dyno Nobel. Several flow diagrams all show Dyno Nobel as the destination.

Others continue to act on this assuming that this fact is truthful and accurate.



I find this behaviour very disturbing.

Has CH Four BioGas or H and D Properties attempted to correct this false hood? If so, how could they in anyway defend this!

## **September 12, 2021 11:20 AM**

My wife and I are owners and residents of the address shown above.

Let me begin by thanking all of you for your dedication to public service.

That's something we don't do often enough.

I am probably typical of thousands of Augusta residents who enjoy the day to day pleasure of living in our beautiful and special township without too much regard for the efforts required to maintain our municipality and all the privileges that we have.

I am writing now because I have a concern that we may be in danger of losing what makes our township special, or even falling below an acceptable standard.

I am referring to the proposed Biogas Facility by H and D Properties Limited, on what I assume is the former Praxair site at 1336 County Road 2, Maitland.

I'm sure you are aware of the negative effects such a facility would have on a large area around this site and so I won't list them, but most egregious would be odour and truck traffic.

The projections by the developer seem greatly underestimated. Even if such a facility should find it's way into Augusta Township, is there not a less objectionable location to be considered?

I am not a municipal planning expert nor an expert on biogas but I have researched sufficiently to know that there are cautionary cases, notably in the London, Ontario area that should raise alarm.

I also know that you have been petitioned by people much more informed of the environmental dangers and damage to enjoyment of life that could occur.

I believe some have also questioned the validity of the application.

## **September 14, 2021 5:08 PM**

I write this email to you as a concerned property owner and as a professional engineer. I work for DuPont Canada and have personally made various applications to the MECP on behalf of DuPont. I know what it takes to put together all of the required information for the MECP to make a proper evaluation.

I have read Mr Duncan's "notification letter" to the neighbours. It is interesting that Mr. Duncan provided this information to neighbours, at the MECP's request, on July 21 when the letter was dated June 21 which included a notice to respond within 15 days. Was this an oversight on Mr. Duncan's part?

Within the letter, Mr. Duncan clearly indicates "This material will be either comprised of up to 600 tonnes of non-hazardous waste or up to 600 cubic meters of other liquid (non-hazardous) waste per day". In the approval to the MECP, he is asking to process 600 tonnes and 600 cubic meters of non-hazardous waste. Was this an oversight on Mr. Duncan's part?

In the application to the MECP, Mr. Duncan indicates that digestate will be pumped to Dyno Nobel. Dyno Nobel knew nothing of this, in fact told Mr. Duncan when they met previously in 2018 or 2019, that Dyno Nobel would have no part of Mr. Duncan's plans. Yet that remains in the application to the MECP. Did Mr. Duncan lie to the engineering firm, CH Four Biogas of a business relationship with Dyno Nobel? How else would such a company include that as part of the design?

Was this an oversight on Mr. Duncan's part?

The property Mr. Duncan purchased in 2018 from Dyno Nobel still has the Dyno Nobel sign on the property. Would this not have been a condition of sale to have the sign removed? Maybe Mr. Duncan forgot to take it down. Maybe Mr. Duncan likes to be devious and hide behind false screens. Was this an oversight on Mr. Duncan's part?

Mr. Duncan did a traffic study, provided an error filled report, during a lock down due to Covid pandemic time frame. He has misrepresented the actual traffic and also failed to mention the additional trucks hauling 600 cubic meters of waste per day from the Dyno Nobel site (had the site agreed to that arrangement, which they have not). Was this an oversight on Mr. Duncan's part?

I could go on with other misstatements, falsehoods and blatant errors in the various work Mr. Duncan has submitted. In my capacity within DuPont to submitting documentation to the MECP, had I submitted such lies and egregious falsehoods, I would have likely been fired.

In my examples above, Mr. Duncan has not made a technical error. He did not make a decimal point error. He clearly is understating, misrepresenting, and withholding information from his story, in different regards, to whichever audience he needs to, in order to get his processing plant built.

If you only had one such example, you may say an error was committed. Together they start to tell a story that Mr. Duncan cannot be trusted. If he has behaved this way in the

above examples, would it not be very likely that there are other misrepresentations throughout his application? I do not know Mr. Duncan's motives, but to me, it appears like Mr. Duncan is not an honest person. Is that who I want to build and run a plant in my neighbourhood? No because I cannot trust the person and I know based on this sampling, there will be other negative consequences to our neighbourhood.

The ministry has options. The ministry can go so far as to prosecute Mr. Duncan if they wish for falsifying information. An easier solution may be to simply stop the application process and refuse to grant approval.

## **September 17, 2021 12:57 PM**

I have recently been made aware of the proposed biogas digester at the old Praxair/Liquid Carbonic site on County Rd. 2 in Maitland. As the crow flies, our site is north easterly only about 600 - 700 meters away.

Firstly, I was never made aware of the biogas project by H&D in order to make a timely remark prior to the application response period closed. I was made aware of the project by Sandra Kinghorn at Dyno Nobel and a local resident from County Rd 2.

At Airgas, we are Canada's only producer of medical grade nitrous oxide that ships coast to coast through third party distributors.

After reading the articles forwarded to me and the trouble the ministry has had with similar sites, my concern is not only for my employees being continuously exposed to obnoxious odours, but for product quality as well.

Noxious odours are airborne molecules. Our raw material is stored in atmospheric tanks and as the tanks deplete, outside air is pulled in. If this air is contaminated, I am unsure what the effects would be on our medical grade product if the raw material was exposed to such molecules. This may not be a concern however, unless this biodigester is guaranteed not to emit any airborne contaminants (which I don't think possible from reading the articles) I would definitely be opposed to any approval.

Thank you for taking the time to read my concerns.

## **September 20, 2021 6:14 PM**

I have the following building comments. I could not tell from the drawings if the existing building was to be modified for the purpose intended or if it was a drawing error.

I do know that my former employer had a laydown area of 3 acres that was paved and used for managing transport traffic into and out of the site. The proponent does not need that much space, but I suspect that the space he has is insufficient to manage the transport inbound and now outbound given no Dyno Nobel transfer or tanks. Will he

need digestate tanks on his property? Will he use the receiving building to fill digestate tankers? If so where do the contaminated payloaders go?

Thanks again for the opportunity to comment.

I also was confused by the spill containment solutions and methods for the AD's and liquid tanks: hanging bags below the organic liquid tanks vs permanent concrete containment structures or the volume of containment for the AD's: I could not see how any volume was created by spray coating the concrete walls of the AD's?

## **September 24, 2021 3:26 PM**

Dear Mr. Keyvani

Does Mr. Duncan have enough acreage to safely and environmentally safely manage what he intends to do? We don't think so. We believe that Mr. Duncan saw a cheap building that looked ok (vintage 1940?) with adequate property and gave no consideration beyond that to proper siting.

I researched what others might consider essential and found this about the Durham Regional Energy Center. "The Durham Region Siting Process" which included a notification and educational process across the region, was a search for land to process 27,000 tonnes of regional organics through Anaerobic Digestion.

Durham engineers required a **minimum** of 20 acres : Mr. Duncan has 15.7 of which 4.45 acres is the road allowance into the plant site. 30% of the remaining acreage is unusable because of a steep slope and drainage ditch to a sensitive wetland below leaving him with 8 acres of useful flat property: 50% of what Durham engineers considered the minimum required acreage.

Mr. Duncan is already siting his AD's up to and encroaching on a steep slope into the drainage ditch. If he needed the Dyno Nobel tanks for digestate he may have to find room on his site for digestate storage tanks and there is not room.

Duncan plans to process 219,000 tonnes: almost 10 times the volume in less than half the space considered minimal.

I know that Commercial Jet aircraft is not your concern, but you should know that Duncan's building is on the approach to the Ogdensburg Airport only 10 km away. Commercial Jet Aircraft fly in/out daily. Durham Site planners realized the significance of the safety regulations governing construction of waste transfer near airports and chose a location that did not interfere with the safety of commercial aircraft: 15 km is the minimum.

I was disappointed though that Durham was relying too much on technology to control odours and failed to mention anything about complaints and fines when built too close to residential communities. Ultimately, they chose a location 3 kms away from residential areas. Even that can be too close.

## **September 24, 2021 4:08 PM**

I have written to you once before, August 2nd, regarding H&D Holdings proposals to build a waste disposal site with anaerobic digesters at 1336 County Road 2, Augusta Township (<https://ero.ontario.ca/notice/019-2185#proposal-details> and <https://ero.ontario.ca/notice/019-2772#proposal-details>).

Since that time, I have gathered more information pertinent to his proposals and wish to submit further comments.

In Donald Duncan's submission re Progressive Odour Management Plan he states in section 4.1 that "there are currently odours associated with farming and industrial activities that are part of the baseline odour conditions at certain times of the year." At best, this statement can be described as misleading. We bought our property at 1345 County Road 2 in 1983. We built a home on the property in 1984 and have lived there for the 37 years since. The distance between the property lines of 1336 and 1345 County Road 2 is 351 m +/- 5 m, as measured on Google Earth. We would not have continued to live here and pay exorbitant riverfront residential taxes if we had ever had obnoxious odour and noise pollution to contend with. Not the case! The only odour we occasionally get – and it is not obnoxious – is from Ingredion Corp. in Cardinal (23 km to the north-east), if there is a north-easterly wind and if rain is imminent. Very fleeting and very infrequent. We do not have any farming smells in our community. There are no active farms along County Road 2 from Maitland to Prescott, hence no farming odours ever. We have lived compatibly with the industrial companies, Invista, Dyno-Nobel, and Praxair for years; there has never been an odour issue with any of these companies. We want to continue to be free of air and noise pollution. This will not be the case with locating an anaerobic digester on this industrial site.

If Donald Duncan (and CH\$ BioGas) can be so misleading on such a simple issue, how misleading are other statements in the remainder of the submissions? There is a lot of very technical data in the submissions which I cannot speak to.

When Donald Duncan came by our house with his Notice to Neighbours (almost a year after he submitted his proposals to The MECP) he stated that the facility would not cause any bad odours. If that is true, why did he apply to the MECP (Ministry reference number 1375-BTAQUQ) for permission to emit to the atmosphere: "particulate matter, nitrogen oxides, methane, sulphur dioxide and noise." Any chemist, and I have a university degree in chemistry, can tell you that nitrogen oxides and sulphur dioxide

stink. Once again Duncan made misleading statements. How can anyone trust Donald Duncan to speak the truth?

The Richmond News published an article with a map attached (<https://www.richmond-news.com/local-news/engineers-harvest-power-differ-on-source-of-odour-3046289>) indicating the location of complaints relative to the locations of an anaerobic digester at Harvest Power in British Columbia. That map indicates that most of the complaints came from 5-10 km distant and there were many beyond 10 km. Duncan's anaerobic digester could potentially cause many residential households to be affected by putrescent odour.

Anaerobic digester facilities have a history of failing to live up to their promises of clean air and no odours. These facilities have no business being located anywhere near a residential community and we would expect the Ministry of the Environment, Conservation and Parks to protect Ontario citizens from such malodorous facilities. The first caveat by the Ministry in approving these anaerobic digesters should be locations far away from residential communities which are adversely affected with little hope of redress. I do not know if the MECP has any criteria regarding locating anaerobic digesters a minimum distance from residential areas; if not, it should.

**September 24, 2021 5:09 PM**

Dear Mr. Keyvani

I want to invite you to review a video presentation made by the residents of Dingman Drive in South London who have experienced years of malodours from StormFisher and Orgaworld. This is the simplest way for me to share the story of the victims of this “green” and “sustainable” process of generating methane from organic food wastes.

<https://drive.google.com/drive/folders/1rd0TDSPLY9zlrPWSY2RZqPH1yNKBqdwLy?usp=sharing>

Scroll Down to “**City Hall Presentation**”.

This is a recording of how “green” can cause harm and hurt people.

I hope that you will take the time to review it.

**September 24, 2021 12:46 PM**

Although the vast majority of the correspondence you will have received on the topic of the proposed waste disposal site has come from M, let me assure you that this is simply because he is by far the most knowledgeable person amongst a very large group of infuriated residents who see the potential for their health and welfare being threatened.

(Name removed) is our spokesman and we, the residents of this area are deeply indebted to him. Should it be necessary, this campaign to prevent social injustice and a threat to health and welfare can, and will, be raised to a much wider audience. The number of residential properties that would suffer from poisonous doors and the threat of vehicle mayhem along Maitland Rd and County Rd #2 is huge.

I have read the material that he has copied to you, as have many many others. Not one person has questioned the veracity of his statements.

(Name removed) is very much our representative. His vast industrial experience and his long time living in this area, make him perfect for the job. It is a job that he has unselfishly taken on, not for personal gain, but in order to protect his neighbours.

I could spend hours compiling material, as (name removed) has done and send it on to all of you, but it would gain nothing as you have already seen it all.

I urge all of you to realize that the question here is not one of whether bio digestion has a place in Canada. It has everything to do with the fact that facilities of this type should be located far from residential areas. The Thousand Islands area is a beautiful place to live and is increasingly a magnet for tourism, which is potentially a far more viable source of prosperity for Eastern Ontario.

I just leave you with this thought: (Name removed) IS RIGHT, DEAD RIGHT, AND HAS THE SUPPORT OF A LARGE AND GROWING BODY OF RESIDENTS.

**September 25, 2021 11:01 AM**

[https://drive.google.com/file/d/1EmI\\_iEDT3Mfe3AaTs7r9GvsSXp\\_FQwZP/view?usp=sharing](https://drive.google.com/file/d/1EmI_iEDT3Mfe3AaTs7r9GvsSXp_FQwZP/view?usp=sharing)

To all of you, MY APOLOGIES - VIDEO DID NOT ATACH THE FIRST TIME.

**PLEASE** take the time to watch this video in its entirety. It concentrates on the stench associated with plants of this type, but there are also massive concerns with regard to vastly increased traffic and the possibilities of accidents causing unthinkable damage from spills.

For the council and other governing bodies to approve a venture of this kind would merely be a matter of a vote and a signature. To try to remove the damage afterwards is a whole different issue. It is far better to avoid damage than to try to correct disasters afterwards.

Ours is a residential district full of lovely home of the same type you see in the video. The people who live here are again typical of the people in the video. We are peaceful, happy and want to stay that way.

It is to be noted that after the damage was done, as shown in the video, the local council were making no real effort to correct the problems. Trying to force an operation such as this to shut down and relocate is not easy. Refusing to approve it in the first case is simply a matter of voting it down and not picking up the pen to sign approval.

We pay enormous taxes in this area, for which we receive virtually nothing. Its it too much to ask that we be protected from a potential disaster, when giving that protection would cost nothing??

## **September 28, 2021 3:00 PM**

To all,

I was one of those who audited the council meeting last night and was thoroughly dismayed by the misinformation being propounded by the two persons trying to curry support for this waste disposal site with anaerobic digesters.

Unfortunately we were given no opportunity to ask questions.

When a speaker, speaking in favour of the waste disposal project, had to resort to insulting talk about a person who is a respected member of the community and who opposes this project with considerable community backing, it is immediately obvious that the arguments in favour of proceeding are, at best, weak.

I listened, hearing a good friend, who has been the spokesperson for a large and growing local community, directly vilified. His well researched data was referred to "lies and exaggerations". That, in addition to being inaccurate was unpleasant and highly insulting.

The reality is that the misinformation, or lack of information, from H & D properties was, and is, disturbing. The sign on #2 still refers to this being a CO2 plant. That sign should, correctly, have been removed immediately after purchase. The site was bought three years ago. Was this a deliberate attempt to deceive the residents? The bottom line is that a few people to this day still think Praxair is currently operational. H & D properties have stated that they can operate this plant odor free, when others in Ontario and throughout the world, for example New Zealand, have failed to do so. Statistical evidence based on what has actually happened to other communities who have had to live with operations of this kind was dismissed with the comment that technology has evolved to the point where we should all smile and be happy, because, in the words of one speaker, the waste disposal site with anaerobic digesters would be a tourist attraction. Try to keep a straight face as you reread that last sentence.

A plant in Richmond BC was shut down in 2017 because of odors. That was comparatively recently. Many have been fined.



The council has an obligation to its residents. We elected you to do the job of acting in the overall best interests of Augusta Township. This waste disposal site with anaerobic digesters. is not in our best interests. We do not want the noise, stink, traffic congestion and risk of accidental spills that would undoubtedly accompany this proposed project.

Would the proponents of this project be prepared to put it in writing that any negative effects would result in generous financial compensation to each and every household? I doubt it.

Mr. Duncan in his own words, "purchased the site to do something else with it". Why did he change his mind? Was there ever any consideration given to the health and welfare of the community. Mr. Duncan spoke to us twice. Once when instructed to do so by the ministry of the environment this past June, and again last night. Three months ago we all knew nothing.

This all boils down to money for a self-interested few versus the health and welfare of a large community.

I thus ask that the council please look at the history, follow the science and take serious consideration of where problems have arisen and then seriously respect the best interests of our community and say NO to this.

Respectfully and hopefully

**October 14, 2021 7:35 AM**

Dear Mr. Keyvani

Re: 1336 County Rd 2 Maitland ON

I know that the comment period is over, but I think this is important.

Why do some waste disposal plants with anaerobic digesters plants stink and others do not? I sought answers from the BC Biofuel Depot who process food wastes using Anaerobic Digesters (tunnel type).

I learned that the plant has been operating since 2017 and the public record indicates that the plant has had no odour complaints. The public record (video) indicates 30% of a \$68 million dollar budget was invested in odour abatement equipment for a plant capacity 50% of what is proposed for 1336 County Rd 2.

The BC Biofuel Depot manager confirmed that the OU emission out the stack performance standard is 1 OU/M3 at 70 meters above grade. 1 OU/M3 through dispersion will be significantly less at property limits with industrial park neighbours and just as important significantly less than 1 OU/m3 for residential neighborhoods located 1 Km away.

On the other hand, the proponent has applied for an emission of 2000 OU's out a 23 meter stack, relying on dispersion and weather conditions to do the work that the BC Biofuel Depot does with appropriate odour abatement technology.

Are 2000 OUs out the stack an acceptable performance standard for Ontario? Why is it not 1 OU/M3 like BC?

## **October 14, 2021 8:15 AM**

To the best of my knowledge after reviewing the submission application to the MECP the proposed stack height at 1336 County rd 2 is 30 M not 23 M as I noted in my last letter. 2000 OU's will also be emitted from four emission sources and not just the stack.

## **October 19, 2021 6:18 PM**

Dear Mr. Keyvani

Re: 1336 County Rd 2 Waste Disposal Site with Anaerobic Digesters

I followed your suggestion and spoke with Mr. Paul Taylor; site manager of Bio-En Power, Elmira Ontario. He was kind enough to return my phone call.

He confirmed:

- That Bio-En Power; Elmira is sited adjacent to residential neighbourhoods and a nearby school.
- That they have had one odour complaint since start-up in 2014.
- They responded to the complaint by conducting an engineering study and discovered a deficiency in their bio filter odour abatement system; cold air in winter negatively affected the bio filter performance when receiving building doors opened.
- That the owners; a 5th generation Elmira family, willingly spent capital to correct the defect.
- That they operate on a four-acre site.
- That they currently use "the industry standard bio filters to treat fumes and not carbon filters ". He suggested carbon filters are more suited to farm-based manure fed AD's.
- He estimates that his stack discharge today would be 1000 OU/m3. They expect better results when they "upgrade to a new odour eliminating technology; photo ionization".

- He also mentioned that he visited the Surrey BC Biofuel Depot and can attest to the plants odour and complaint record but did caution that the plant is different in terms of processing and feedstock.

I only wish that the proponent in our case was starting with a track record like Bio En Power. I am now more concerned that the Maitland facility will pollute the neighborhood because the most appropriate technology won't be installed. Mr. Duncan is not processing manure and should reconsider his odour abatement process.

**October 21, 2021 12:45 PM**

Cc: Mohsen Keyvani, Director Waste Management Branch MECP

Cc: Augusta Township Council

Re: Malodour Standards Are They Sufficient to Prevent the Pollution of Residential Communities?

Hello Minister Clark

I understand from Mr. Doug Brewer that you are consulting with the Minister of the Environment, Conservation and Parks over the proposed Waste Disposal Site with Anaerobic Digesters at 1336 County Rd 2, in Augusta Township. I hope to hear back from you soon, please.

You should know that the residents living nearby, including the village of Maitland are upset and concerned about this proposal.

As the Minister of Municipal Affairs and Housing I would hope that protecting the "health and wellness" of existing residential communities is equally as important as the governments target of removing food waste from landfill by 2022.

Unfortunately, the Ontario Waste-To-Energy Anaerobic Digestion industry has a track record that includes a long list of odour complaints from neighbours. The industry simply stinks and its infringement on residential neighborhoods should not continue.

If you have any influence at all with the MECP please insist that applications that are located within 5 km of residential communities:

- 1) meet a lower odour release limit out any stack, than current laws allow, and
- 2) include in any odour calculation the addition of "an odour safety factor" in the design of abatement equipment

For your information

- 1) the technology exists to build a plant that does not harm neighbours. I corresponded with a plant in Ontario: BIO EN Power of Elmira, and the Biofuel Depot in Surrey BC. Both plants have operated with no odour complaints. In both cases it seems that the odour released from their stacks is significantly less than the industry.
- 2) “Odour emissions can generate annoyance to residents living nearby; reporting respiratory problems, eye irritation, hoarseness and unusual tiredness among others physical symptoms from people living within 1.5 and 5.0 km from the facility (Aatamila et al., 2011).” Olores.org - Odour Control at a Waste-To-Energy Anaerobic Digestion Plant by a Full Scale Biofilter

## November 9, 2021 12:03 PM

I know its too late to comment on 1336 County Rd 2 Augusta Township Waste Disposal Site but I am compelled to ask these questions of the MECP.

Did you know that 1336 County Rd 2 is located inside a natural wind break?  
Did you know that weather near the river is very localized and is similar but different from the weather at the Brockville Airport 8 km north of the river?  
Unfortunately, the odour dispersion/dilution assessment of 1336 County Rd 2 is based on weather at the Brockville Airport where the MET Tower is located on a wide-open, tree-free flat plane.

This ship exhaust plume shows what happens to gaseous emissions on cold or fog days on or near the river: the plume is trapped and falls to the surface. Even on clear and windy days diesel odours can be detected on the water when the ship is still 2 km's upwind.

The proponent is planning to discharge 2000 Odour units/stack from four emission stacks: one stack at 29 m, two stacks at 3.7 m and one stack at 5.5 m. The surrounding trees to the north and east are higher than all but one of these stacks. **The proponent is not eliminating odours like two other AD operators are. Both Stormfisher and Bio EN Power have applied for or obtained approval from the MECP to install odour elimination technology in addition to bio filtration.** Unfortunately, it took years of residential complaints for StormFisher to act.

Concerns:

- The plant will release odours from four stacks; three of those stacks are below the treeline.
- 2000 OU's x four stacks are a very large stink number
- Odorous plumes can expand and propagate downwards becoming trapped at nearby receptors.

- Three of four stacks are lower than the surrounding tree line. Will odours from these stacks get trapped also?
- Sometimes the local weather will not dilute or disperse odours but will trap odours.
- If you must depend on the weather to dilute and disperse the stink from a stack, then expect complaints when the weather does not cooperate.
- The proponent's receptor calculations do not represent the site conditions.
- As a minimum will you require the install of stack odour elimination technology?