

May 20, 2019



Emily Hogeveen
Ministry of the Environment, Conservation and Parks
135 St. Clair Avenue West; First Floor
Toronto, Ontario M4V 1P5
Emily.Hogeveen@ontario.ca

Nicole Willett
Director of Government Affairs
Waste Management of Canada Corporation
117 Wentworth Court
Brampton, Ontario L6T 5L4

RE: Excess soil regulatory proposal and amendments to Record of Site Condition (Brownfields)
Regulation, ERO 013-5000

Dear Ms. Hogeveen,

As the largest environmental solutions provider in the United States and Canada, and as the only Waste Services company to receive recognition as a “World’s Most Ethical Company”, Waste Management applauds the Ministry of Environment, Conservation and Park’s efforts to strengthen enforcement against environmental violations, including illegal soil dumping. We agree that heightened enforcement tools and modernizing the process to hold polluters accountable will safeguard our ground and surface water and preserve human health.

We do have one recommendation to the pending legislation however. The proposed regulation states that changes will include: “landfill restrictions on deposit of clean soil (unless needed for cover)”. We propose that the “(unless needed for cover)” be expanded to include all activities requiring excess soil at a landfill. These include but are not limited to: road building; contouring; capping; berms and site maintenance, which are required by MOECP to maintain site conditions related to our ECA. If we are unable to utilize excess soils for these activities, it will become increasingly difficult for the waste business to comply with MOECP issued permits.

Thank you for the opportunity to provide our comments. If you need further clarification, please do not hesitate to reach out to me at nwillett@wm.com or at 416-702-9458.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicole Willett'.

Nicole Willett