

REBUTTAL TO COMMENTS MADE BY CORONATION ORGANICS ON RESIDENTS PETITION

This document details our Rebuttal to the comments made by Coronation Organics on the original concerns raised in the Petition (coloured blue) against the new waste plant proposed at 633 Coronation Drive in Westhill. Our rebuttal answers are in italics following the ‘clarification responses from Coronation Organics’, which are highlighted in yellow.

Concern 1:

Prevent environmental damage to our neighbourhood from >200 heavy trucks per day transporting waste in and out of West Hill 24/7/365, resulting in the production of significant noxious gas emissions and raising neighbourhood noise/safety concerns.

Coronation Organics Response:

The project will not release significant noxious gases into the atmosphere, and not pose a safety issue to the neighbourhood. An Emissions Summary and Dispersion Modelling Report which models the impact of site emissions to the air within a 4.8 square km area of the facility was conducted. This Report has been submitted to the Ministry of Environment Conservation and Parks (MECP) for review.

An **Odour Assessment** was conducted to determine if the facility design will meet odour requirements that are set by the MECP. The results from the dispersion model indicate that the rigorous odour control mechanisms that are in place will protect the community from odour issues.

An assessment of the impact of noise from the facility was submitted to the MECP and a full Acoustic Assessment Report is currently underway.

In addition, a third party Traffic Impact Study is currently being done to assess the impact of truck traffic that this project will have on the community. The number of trucks and the types of trucks as well as the routes they will take will be reviewed and recommendations will be made on the best way for the Facility to move material into and out of the facility to minimize impact on the community. It should be noted that the photographs used in the petition are not representative of the types and cleanliness of the trucks that will be used at the facility. The ECA application that was submitted to the MECP clearly states that all trucks leaving the Facility will be washed inside a closed building that is designed to control and treat odours

Rebuttal: The opening statement from the ‘clarification’ “this project will not release significant noxious gases into the atmosphere, and not pose a safety issue to the neighbourhood” is not only misleading but it is factually incorrect. To quote the ESDM report that they completed (based on data that could not be verified, as the manufacturing data provided with their report did NOT include emission rates and could not be verified with the documents provided), the following emissions are submitted by the proponent as ‘normal operation’. Note this table is simplified and only shows the emissions predicted and their % against the MAXIMUM allowable ministry limit.

Extract from EDSM Report

Table 1 summarizes each contaminant’s predicted maximum ambient concentration by source for Emission Sources 1-6 (standard operation of the facility plus use of the flare) and the worst case hydrogen sulphide concentration resulting from the emergency use of Emission Source 7.

Total Reduced Sulfur (TRS)	71%
NOx	35%
SO2	69%
PM (particulate matter)	21%
CO2	301%
CH4	40%
TRS from PRV	9,485%

This table is taken from the executive summary in the emissions report submitted by Coronation Organics. We understand that the PRV (or Pressure Relief Valve) is not to be used in normal operation, and is there just in case of emergencies. Clearly if it is to be used, there is a SIGNIFICANT concern about safety in this residential neighbourhood when the maximum limit would be about 10,000% higher than allowed. But even ignoring this, the fact that CO₂ emissions are estimated to be 300% higher than allowed – begs the question - is this not a 'significant noxious gas release?' or 71% or 69% of the MAXIMUM allowed. Clearly the limit is there for a reason, it is completely safe if under and only bad if over. Any amount approaching that limit is bad and to say there is 'no release of significant noxious gases' is just factually incorrect. (And remember this is considered normal operation – what happens if things go wrong).

The other significant omission from the emissions report is that there are NO emissions included from the significant number of trucks entering and leaving this site. It has been estimated that about 200 heavy truck trips per day will be entering and leaving this site. Clearly anyone who has been around a large diesel truck knows there are significant emissions from these machines, but no mention of them was found in the emissions report.

The Odour assessment that was conducted talks of only two locations where odours can escape. Yet the emissions report cites 10 locations where emissions (ie: gases) are emitted. It is unclear how gases can be emitted, but no odour from those gases are considered. Additionally, there is no mention of the odour from the over 200 truck trips. Clearly as anyone who has been around a garbage or green bin truck knows that significant odours are emitted from the material in the truck, as well as odour from the operation of said truck. There is no recognition or consideration of these odours in the odour report – clearly an omission that is not acceptable. A local biogas facility located at the Zoo did take into account the odour emissions from truck traffic in its odour report, and they have significantly less truck traffic than this proposal.

Finally, the Odour assessment that was filed is based on a capture of odour from a facility that is 'similar' to this proposal. At issue is, this site is from Seabreeze Farms in B.C. (it is located on a farm right next to a major highway), it is an anaerobic digestion facility, additionally it processes about 1/10 of the amount of material that is being proposed. It also states that about 40% of the input material is manure. It is unclear if this proposal will also have 40% manure input, otherwise it is unclear how the odour emissions can be deemed similar.

The Noise assessment provided by the proponent does not accurately represent the noise issue, as the distances used in the report are inaccurate, and significantly underestimate the problem. Additionally, as before, no truck noises outside of the facility are included, only noises from trucks once they are in the facility. Clearly truck noises, including back up beepers need to be included. We also require assessment of additional noise generated by 200 trucks travelling through our neighbourhood all day and night. Finally, the noise assessment uses noise levels provided by manufacturers, but some of these are just emails, and clearly not scientific noise test limits. It is frustrating that an organization is asking for approval for a significant project such as this (would be the biggest of its kind in Canada), but is unwilling to accurately reflect the data in a professional and accurate way.

There is mention that an acoustic study is underway, but no mention of what it is. It has not been provided as of July 31, 2020, with the current end of ERO submissions ending July 31st, 2020. Clearly allowing no time for review, even if it appears now.

The 'traffic study' has been read and is found very disappointing. The purpose of the study per the proponent is to 'assess the impact of truck traffic will have on the community'. It was clear from the report that the community was not considered, nor was the impact of trucks assessed.

Comments were made about the pictures being inaccurate because they show dirty trucks, and the trucks are washed prior to leaving the facility. These pictures were included because they do reflect some concerns we have with so many trucks coming into the facility. It has been stated that trucks arriving will be full of 'putrescible waste' (rotting green bin type waste), and because these trucks will be arriving 7/24 and will be arriving along roads that do not have sidewalks on both sides, are passing school zones, past parkland and many many residences, there will

be occasions that a truck will have to break hard and fast in order not to hit children crossing the road, bicyclists, dogs, deer, pedestrians stepping off the sidewalk because of social distancing etc.....The picture of waste all over the truck was of a truck carrying waste and stopping fast, it created a mess and does happen (see photo below), and will happen in this neighbourhood,

Truck carrying Toronto sewage sludge has to break suddenly and spills load in Flat Rock, Michigan (Globe and Mail)



Concern 2: A proposal by 2683517 Ontario Inc. has been received by the Ontario Ministry of the Environment to develop a private waste processing and transfer plant, with a biogas anaerobic digestion system, at 633 Coronation Drive (just up the street from the sewage treatment plant) on the Lake side of the site.

Coronation Organics Response: The proposed facility is a combination of an organics processing centre and anaerobic digester system. The organics processing centre is used to segregate any infeed that cannot be processed in the anaerobic digesters. Biogas technology takes place within a fully closed tank that uses a biological process to produce a combustible gas from the decomposition of organic waste in an anaerobic setting. The gas, known as biogas, contains roughly 60% methane and 40% carbon dioxide and can be converted to provide usable energy: gas, electricity and/or heat. The second product that is produced with biogas technology is a pathogen-free organic fertilizer called "digestate". ([See Operations](#))

Rebuttal: *The provided description does more accurately reflect the project; the comment from the petition was taken from the proposal documentation provided by the proponent. This clarification is very helpful in defining the project, however, there are some concerns that are raised. Since this facility is more than a waste processing site, it is clearly a renewable energy project, creating biogas and digestate. This makes it clear that a renewable energy zoning is required for this site, and it was agreed with a meeting with the proponent that a change in zoning is required.*

Additionally, there is significant concern that the site for which ECA (Environmental Compliance Approval) is being requested is in fact 4 times larger than the facility that is used for the emission/noise/odour reports. Basically in order to put this plant on the site, there is need to do construction (create new roads, add weigh scales, create a storage site etc) on the entire site where ECA approval is being sought. Unfortunately, the existing facilities are not included in the various emissions/odour/noise reports. There is an existing waste facility on the site, that will remain in place and operate when the new facility is built. There is an office facility, and there is existing truck traffic to support the current operations. None of these facilities or trucks are included in the ECA application, even though approval is being sought for the entire site. Clearly this is not appropriate and the ECA applications need to be not only resubmitted with accurate data, or the ECA site needs to be revised to accurately reflect the area being approved.

Finally, since this is a renewable energy project, it is requested that an REA (Renewable Energy Approval) application be required, since the REA process more accurately represents the process needed to assess a biogas type facility, and ensures local approval is included in the assessment.

The applicability for this site is a major concern and a document from the Canadian Government giving recommendations to municipalities on creating and locating A.D. facilities. The document can be found here: https://www.ec.gc.ca/qdd-mw/3E8CF6C7-F214-4BA2-A1A3-163978EE9D6E/13-047-ID-458-PDF_accessible_ANG_R2-reduced%20size.pdf. The entire section 8 talks about considerations for facility siting, and this site does not meet many of the recommendations. Of particular concern is a chart that is below:

Table 8-1: Typical setback distances

Setback type (distance from)	Distance
Property line	15 to 50 m
Drainage ditches/pipes leading to natural surface water bodies	30 m
Natural surface water bodies and wetlands	100 m
Private well or other potable water source	150 m
Permanent residence	300 m
Hotel, restaurant, food processing facility, school, church, or public park	300 m
Commercial/industrial occupancies	300 m
Water supply intake	300 m
Airports	8 km

Notes:

Municipal and/or provincial regulations may exist that contain specific setback requirements. These requirements should be identified and reviewed during the facility planning process.

km—kilometre

m—metre

This site in particular is within 300M of a residence, within 150M of a restaurant, surrounded by commercial/industrial occupancies, very close to a water supply intake (from the HCTP), as well as abutting an environmentally sensitive area, and part of the Heritage System of Ontario.

Another comment further on states: “first identify a location with the best chance of community acceptance and compliance with regulatory requirements” – clearly this was not done.

Of contrast, the Durham region has just announced a location for a similar facility to produce biogas. The facility is only 40,000 tonnes/year initially with capacity to 110,000 tonnes/year, significantly smaller than the proposal. They have clearly made choices that fit the environmental and common sense requirements for this type of facility.

[Durham takes next step towards Anaerobic Digestion facility](#)

Durham takes next step towards Anaerobic Digestion facility

It is at least 1km from the nearest residence, other side of the 401.

It is within 400M of the 401, and not near any other commercial facilities or restaurants.

It only increases the number of trucks to the existing waste management site by 2 trucks per day.

Concern 3.: If this proposal to process huge amounts of putrescible wastes and truck the wet incoming materials and biosolids by-product out through our neighbourhoods all day and night is approved we are facing a major disruption to the liveability, and safety of our communities.

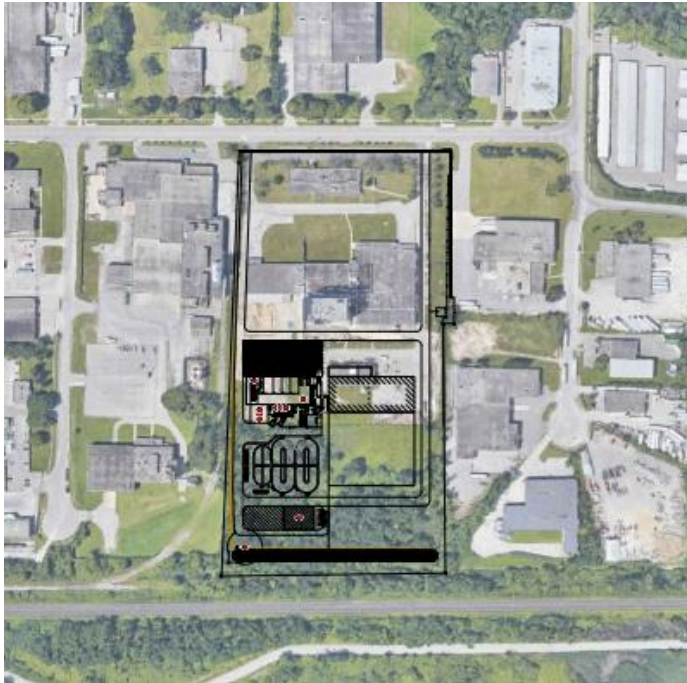
Coronation Organics Response: This application is to process a maximum of 1,240 tons maximum of commercial organic material daily. The product of anaerobic digestion, digestate, is not a biosolid material, it is an **odourless organic fertilizer** which will be used on farms north of the facility to replace and offset the use of chemical fertilizer products. The third-party traffic study will assess impact to the community.

Rebuttal: *We incorrectly used the term biosolids instead of digestate. However, the traffic study did not address the impacts on the adjacent communities. There is no discussion in the traffic study of how the movement of waste trucks will impact the liveability of the affected neighbourhoods, and the safety of the residents The Traffic study does not assess impact to the community as promised.*

Concern 4: The proposed operation will involve 20 times as many trucks as the proposal that was turned down by the Biosolids Environmental Assessment (EA) for the Highland Creek Treatment Plant, and includes 2 anaerobic digesters, 11 natural gas boilers, *one open air storage facility*, and other waste processing and storage facilities.

Coronation Organics Response: There will be no open-air storage of any organic wastes at this facility. All of the processes, including reception, pre-treatment and anaerobic digestion occur within **enclosed buildings or tanks**. The facility is designed with a number of high efficiency, low emission boilers to provide heat which is required for the process of anaerobic digestion. The heat requirements vary from summer to winter and as such, there are numerous boilers to allow the facility to efficiently heat the system. This ensures efficient and timely processing.

Rebuttal: This ECA application is for the site is of a total of 3.24 hectares. There were several site maps provided with the submission and an overhead view is shown below.



The organics processing facility is proposed for the bottom left of this map. ECA approval 4568-AJTR84 is already approved for this site and that approval includes "An Open Permit Storage Area for the temporary storage of 20,000 tonnes of Woodwaste, concrete, brick and block". This open storage area already exists on the site where this ECA approval is being sought (part of the 3.24 hectares). We are unsure how an approval can be requested for the entire site, that includes an open air storage facility, but the activities, facilities, emissions, noise and odour on the entire site are not to be included in the assessment.

Concern 5: The City of Toronto currently collects 150,000 tonnes per year of residential and commercial green-bin organics which are processed at its Dufferin and Disco Road Plants. The Coronation Plant proposes to process up to 900,000 tonnes of wet rotting waste annually – **6 times as much as the entire City of Toronto.**

Coronation Organics Response: This application is for 1,240 tons of organic tonnage per day and is for a mix of both putrescible and non-putrescible. This represents a maximum of 452,600 tons per year (based on 365 days). The plant is designed to process organics originating both from Municipal curb side collection, as well as commercial organics, which is not collected by the city of Toronto but will be banned from going into landfills starting 2022.

These materials are brought to the site in closed trucks, delivered into a closed reception building and processed in sealed anaerobic digesters. There is no open storage of material at this facility at any time in the process. ([See Odour Control](#))

Rebuttal: *There is definitely contradictory information contained in the various applications for approval for this site. The ERO No. 013-2624 that was approved in January, 2019, and includes both the demolition waste processing plant and the organics plant, indicates that site has a limit of 2500 tonnes of waste/day. The current application ERO No.019-1444 that relates only to the organic processing facility, indicates that the incoming waste could include 1240 tonnes of non-hazardous waste **AND** 1240 cubic metres of other liquid waste, We assumed that this could indicate that the organics plant could at some time be extended to handle 2480 tonnes of organic waste. However, based on the clarification, it now appears that the application should probably have replaced the "AND" with "OR".*

We now assume that the demolition waste plant will be allowed to import the other 1240 tonnes of waste daily. Thus, the size of the organics plant and the construction waste plant would be both be 450,000 tonnes of waste/year for a total of 900,000 tonnes. Since the application is for the entire site including the existing facility, it seems only logical that all facilities existing and proposed be included in this application.

Based on the truck photographs included in the Traffic report, it appears that the incoming waste trucks will have tarpaulin covers, rather than tightly sealed lids, these look exactly like the trucks used to haul biosolids. Clearly these trucks give off odours during transit.

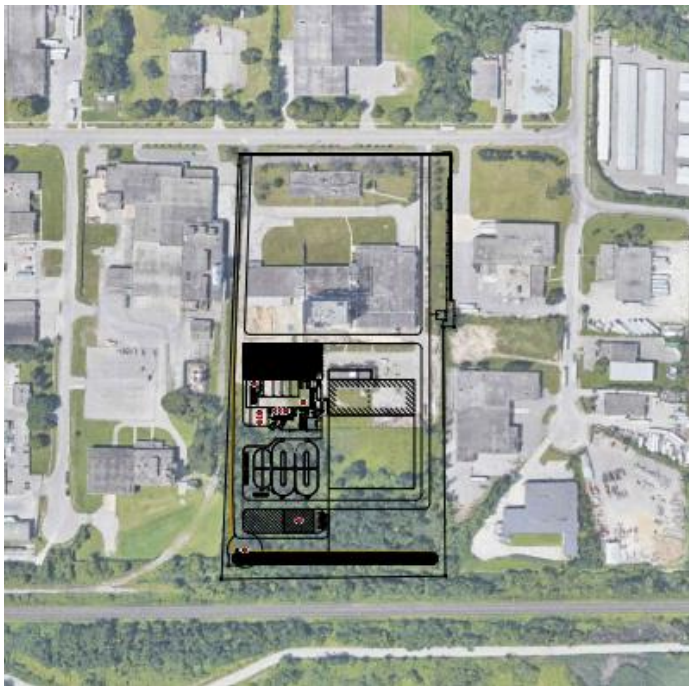
We do not contest that green-bin organics will be banned from landfills in 2022, and we are not against the use of anaerobic digestion for the processing of municipal and commercial organics. The issue we have is the location of this facility; it does not fit in a residential neighbourhood, with emissions above allowed limits, in an environmentally sensitive area that already has high levels of toxic emissions and is part of the waterfront path system.

Concern 6: Both these City owned plants are surrounded by industrial areas with *direct* major road access to 400 series highways without going through residential neighbourhoods, which are at least 700m from the site. The proposed site at 633 Coronation is within 200m of residential homes, within 500m of parks and within 700m of schools. The 6 or 7 kilometre trip to the 401 (depending on the route) by >200 trucks per day would pass hundreds of homes, several schools (primary, and secondary), the University, seniors living facilities, shopping malls, fire/police stations, and community centres.

Coronation Organics Response: The property that is proposed for the facility is zoned for heavy industrial use, and waste transfer is an allowed use by the City of Toronto By-Laws. A Traffic Impact Study is being carried out which will examine the impact of this site on local traffic and provide recommendations to **minimize the impact of the facility on the neighbouring businesses and residents.**

Rebuttal: *The site being assessed is a split site of both Industrial and Heavy Industrial. The current zoning is for 'waste transfer'. The actual use of this site is for creation of renewable energy (biogas) and as discussed at a meeting with the proponent will require zoning approval. There is a renewable energy zoning designation that is required for this site. There is also a concern that part of the site is designated within the natural heritage system, is adjacent to an environmentally sensitive area, has archaeological interest (although no archaeological study was provided as part of the assessment), and is subject to a "ravine and natural feature protection bylaw" (although no plan was submitted how this facility would comply with that bylaw). Confirmation is shown below:*

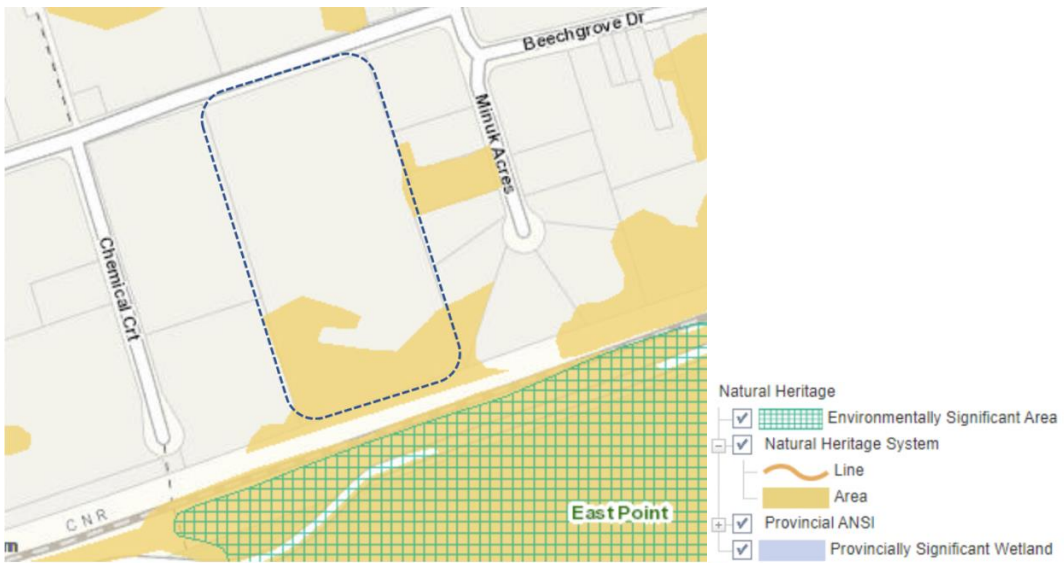
This map is from the Proponents ECA application, showing the site that the application is for. Although the entire site is being evaluated, of most interest is the bottom part of the site (the part shown with the existing trees).



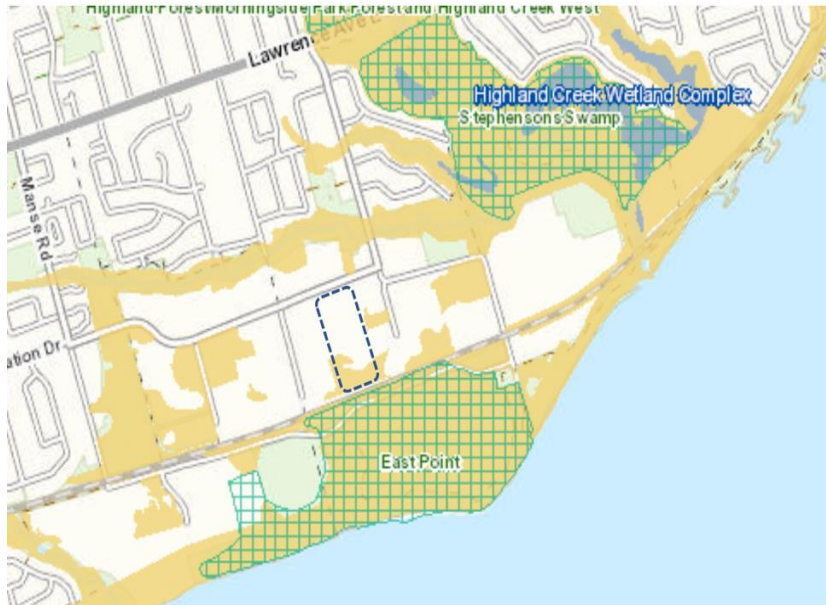
This following map is from the city of Toronto (using data from the Ontario Government where necessary) and is a similar area map. Note that not only is the bottom part of this site subject to the "Ravine and Natural Feature Protection Feature Bylaw", but it also is defined as an area with archaeological interest.



An additional map of this site shows that this facility is located on part of the Natural Heritage System, and the bottom part of the site (where the trees are located as per the proponent's site map) should be managed as directed by the Ministry of Natural Resources. The other concern is that this proposed facility is immediately adjacent to a significant environmentally sensitive area.



Finally, a map with a zoom-out shows how close this facility is to significant wetlands, a large part of the natural heritage system, a large environmentally significant area, and many parks/residences/Lake Ontario etc.



Additionally, the ECA documentation clearly states that the Proponent submitted a letter from the Municipality confirming zoning was in place for this facility, when in fact no letter was submitted, and when asked, the Proponent confirmed they have not yet received zoning approval letter from the city.

Putting aside the zoning issue, it is our opinion that the decision to propose that the largest green-bin waste processing plant in the Province be located on this site is totally inappropriate for all the reasons stated above. As discussed under the other comments herein, and those already submitted to ERO by others, the Traffic Impact Study contains major errors, and does not provide any acceptable suggestions to minimize the impact on the neighbouring businesses and residents. The only acceptable resolution to the stated concerns is to relocate the proposed plant to a more suitable industrial location that is close to a major 400 series highway, is not in a residential area and preferably like many other facilities of this kind, be located on a farm or close to a farm.

Concern 7: The Proponent is planning to truck in putrescible waste (wet decomposing waste) that may include but not be limited to: rotting food, plant waste, animal waste and human waste, and then after processing on site, ship out the residual biosolids and non-processed materials for land application or dumping. There will be noise from the processing plant operating 24/7/365, from heavy trucks entering and leaving the site, and significant emissions and odours from the plant and the trucks (they are typically the large dump trucks with the tarp covering – i.e. open to air) loaded with putrescible wastes. Not only will the impact be to the immediate area (within a few km of this site) but along the route to the 401 (Beechgrove/Port Union or Manse/Morningside likely) with open top trucks causing excessive noise, odour, vehicle GHG emissions and emissions/odours from rotting wet cargo. The current number of trucks using either Beechgrove or Manse to get to 401 from Coronation Dr daily is less than 100, **this proposal will at least triple the amount of trucks using these routes**

Coronation Organics Response: All receiving, processing and truck unloading will be done inside the organics processing centre building which is designed to ensure complete air treatment of all air in the building. Full details of the design and operation of the facility can be found in the Design and Operation Report on the MECP website. A traffic study is currently being done to address the impact of this project on the community. The number of trucks and the types of trucks as well as the routes they will take will be reviewed and the impact of these trucks on air quality, noise and safety will be addressed in this third-party review and report.

Rebuttal: *While we understand the majority of operations will be inside that does not reduce the impact this facility will have on the environment. All 3 reports (noise/odour/emissions) clearly show that limits are being exceeded for all 3 environmental concerns, and that is just utilizing the data provided which is within the facility. There is significant concern regarding trucks as they arrive at the facility. One of the major concerns are the truck warning alarms that go off when the trucks are reversing up to the unloading and loading bays. This has been a problem from time to time at the existing wastewater treatment plant when there is an occasional night-time delivery, especially on a still summer evening when residents are outside in their gardens, going on walks, in the parks etc. The proposed operation plans to deliver most of the incoming waste, and haul out the digestate, during the evening and night-time hours through residential streets. This is a valid concern.*

This traffic study did very little to address the concerns of trucks posed by the community. There were no details on the numbers of trucks travelling through the neighbourhood in evening or overnight hours. There was no discussion on the noise concerns, no discussion on the odour concerns, no discussion on the emissions concerns. Also of great concern, the City was not involved, as was requested by the City Manager on behalf of the City of Toronto.

The assessment of the additional truck traffic from the report shows it will add approximately 100 truck trips during the daytime hours. That means an increase of over 100% of trucks during the day, with large emissions, noxious gases and significant noises going around our school yards, past our houses, our community centers, our parks and other urban areas.

The really disturbing revelation of this study, shows that most of the heavy, emission filled, noisy truck traffic will occur from 8pm to 6am every night, with another approximately 100 trucks making that trip every evening every day of the year. There is NO data in the study on number of trucks currently during overnight hours but an observational account by local residents may show 10 trucks total all night (and that is probably a high number). Assuming that this number is close, this will indicate an increase of truck traffic by 1000%. This will have a significant impact on the community, not only from an emissions, odour and noise perspective, but certainly for the resident's health and safety, and local wildlife and environmentally sensitive areas etc.

Finally, the Government of Canada has a guide for municipalities to address concerns and implementation of A.D. facilities. This guide can be located here: https://www.ec.gc.ca/gdd-mw/3E8CF6C7-F214-4BA2-A1A3-163978EE9D6E/13-047-ID-458-PDF_accessible_ANG_R2-reduced%20size.pdf Section 8.1 has a couple of recommendations on traffic and location of a facility, in particular: "Being able to access the organics facility via a network of appropriate access roads is important to minimizing traffic, noise, and dust impacts on surrounding neighbours, and increasing traffic safety." And further on "Access to the site from arterial and collector roadways is normally a benefit, since it reduces the likelihood that traffic will have to travel through residential areas."

Concern 8: The recently rejected proposal to truck biosolids from the Highland Creek Sewage Treatment Plant (HCTP) involved an estimated 5 heavy trucks per day, 5 days per week. The Coronation proposal is planning 70 heavy trucks incoming with wet putrescibles (and likely leaving empty), and 30 heavy trucks leaving with biosolids digester residues (arriving empty). There will also be an unknown number of trucks removing unusable material to local city owned landfill sites. At least 200 heavy trucks (the two pictures above are examples of the type used in other such facilities) arriving or leaving the site every day of the year, 24 hours a day. The estimated greenhouse gases alone from heavy truck emissions will be about **10,000 tonnes of greenhouse gases (mainly carbon dioxide)** – this is assuming only an 80km trip per truck (typically from small communities and to farmland), however the proposal states it can ship waste from anywhere in Ontario, and if 6 times the amount of waste from Toronto is expected every year the incoming truck routes will have to reach far beyond the outskirts of GTA, and significantly add to the greenhouse gas emissions.

Coronation Organics Response: The majority of the trucks that come to the site will leave the facility empty. They will be delivering material for treatment; the totes will be power washed, and the trucks will leave. The digestate will be loaded onto specialty truck by secure piping will leave the facility to bring to area farms for storage until they are land applied as an organic fertilizer.

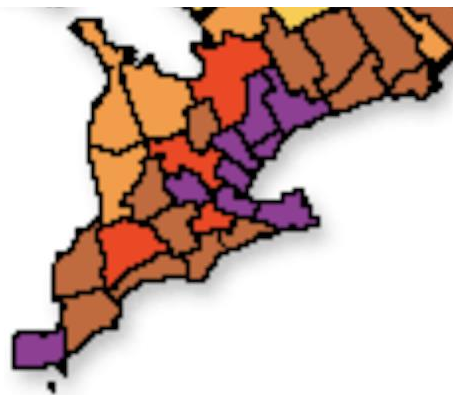
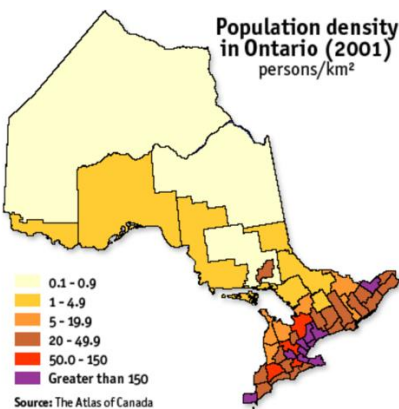
Currently trucks pick up organic waste from the GTA and bring them to a variety of areas for processing – either other anaerobic digesters, farms or landfills. The location of this facility will result in less trucking of organic materials around Ontario (and sometimes further) to find “homes” for it and close the nutrient loop, returning valuable nutrients to farmer’s for use on their farms, reducing chemical fertilizer usage. The facility will result in a reduction of greenhouse gas emissions as it will reduce trucking of organic wastes. The process of anaerobic digestion will treat these organic materials and captures the carbon dioxide and methane gas that is released during the decomposition of these materials. Rather than diversion to a landfill, these byproducts will contribute to a [circular economy](#).

We have no objection to the organic processing plant being built in Ontario to help reduce the amount of waste that will be buried in landfill. Our objection is that the location selected for the plant, is surrounded by environmentally sensitive park areas and residential neighbourhoods, and the part of the site where this facility is expected to be built is actually part of the Natural Heritage System, and on an archeologically interesting area.

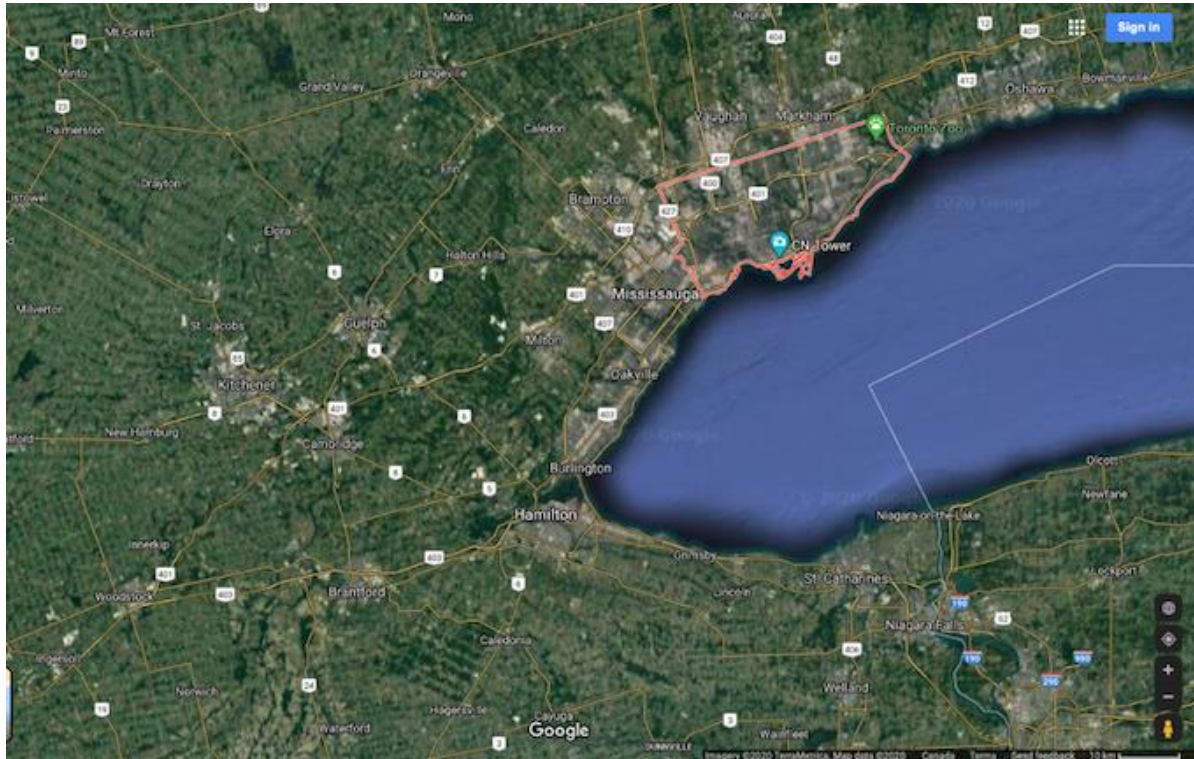
It is also a long way from major highways and is at the very east end of the City, far from most sources of the waste materials and the destination of the processed digestate fertilizer material.

The claim is that this project location is will result in less trucking around Ontario is patently not true.

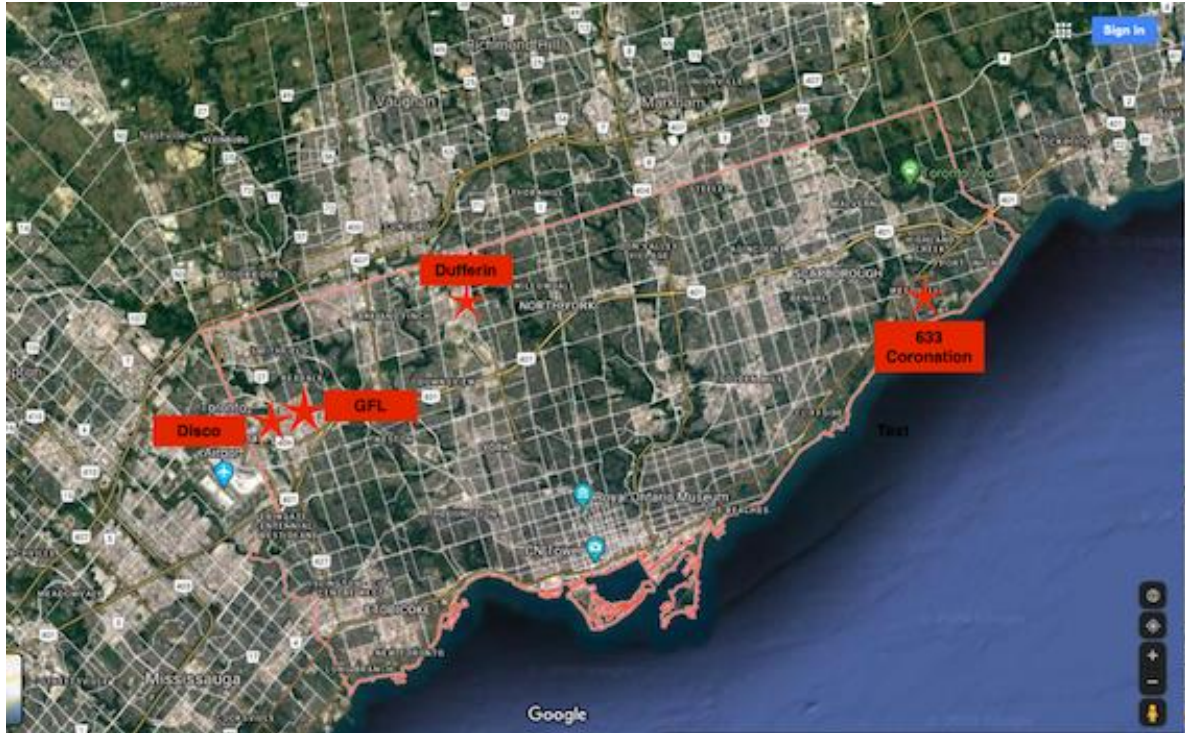
It is reasonable to assume that the source of the organic waste material for the plant is tied to the location of the population. The maps below show the population density for Ontario and southwest Ontario. It is clear that the ideal location for the plant would be close to the northwest corner of the City of Toronto, or preferably outside the City on a major highway.



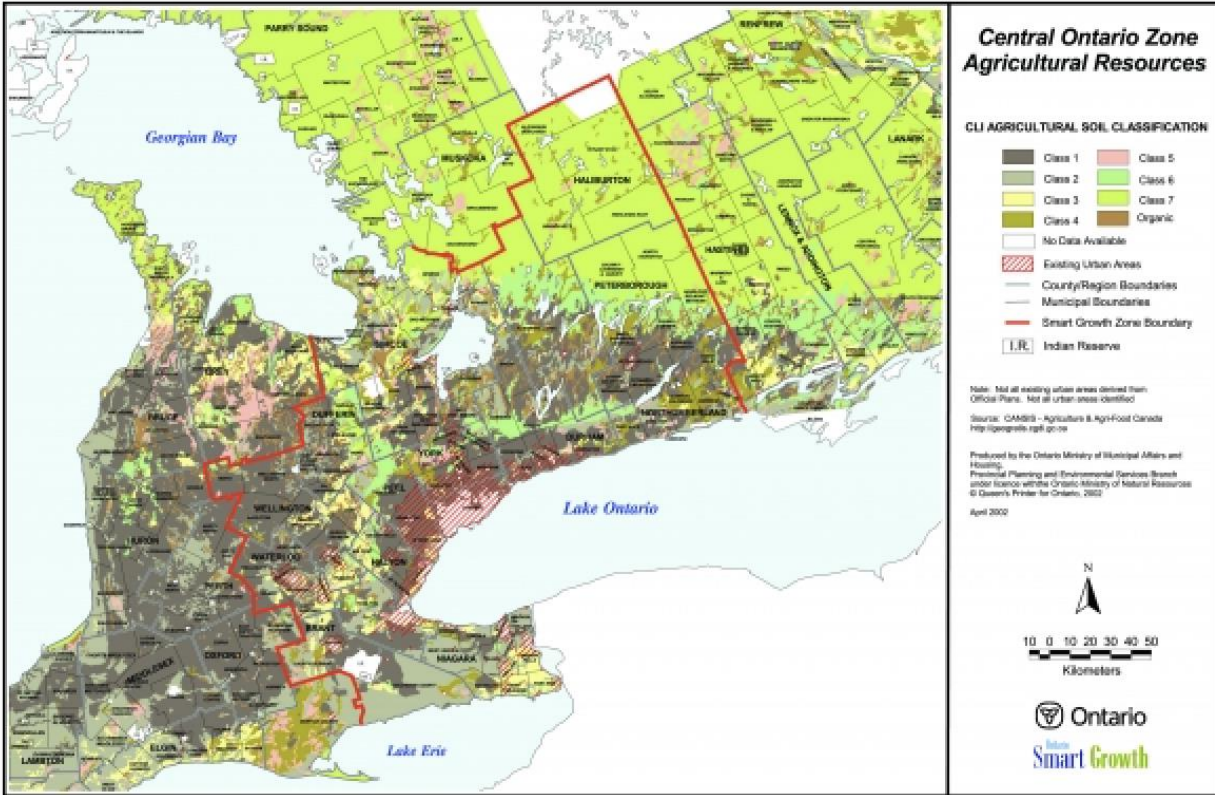
The application suggests that the waste will largely come from the GTA and surrounding municipalities. As the map below shows, a northwest Toronto location would be ideal for serving Toronto, and the large cities west of Toronto including Mississauga, Oakville, Burlington, Hamilton and St. Catharines, as well as the Guelph, Kitchener, Cambridge area, while still being close to Pickering, Ajax and Oshawa.



It will be noted the Toronto Disco and Dufferin plants are located in the northwest corner of the City.



The Proponent also states that there will be less trucking of the digestate around Ontario to the suitable farmlands that need the fertilizer. It will be seen from the map below that the majority of the Class 1 soils, which are best for agricultural use, are to the west of the City, again favouring a west-end plant.



It is therefore clear that the Coronation site for this facility is triply unsuitable, as it will result in many negative impacts on the residents of Southeast Scarborough, and it will result in significant additional release of greenhouse gases from the truck exhausts travelling the extra distance to and from the southeast site. The fact that there will be reduction in GHGs because the wastes are not going to landfill is irrelevant, as this would also be true for a location anywhere else in Ontario.

Concern 9: The proposal confirms that 6 gases, which will severely affect the air quality, are to be emitted to the local environment from this processing system, The HCTP EA evaluated over 25 noxious gases; there are concerns that some noxious gases may have been missed in this assessment. A December 2019 emission model released for the proposed plant showed the following emission estimates:

- nitrogen oxides (NOx) - up to 35% of ministry limit
- sulphur dioxide (SO2) - up to 69% of ministry limit
- particulate matter (PM) - up to 21% of ministry limit
- **carbon dioxide (CO2) - up to 301% of ministry limit**
- methane (CH4) - up to 40% of ministry limit
- total reduced sulfur (TRS) - up to 71% of ministry limit

It should also be noted that besides the emissions that far exceed the allowable limit, **all 6 of these pollutant emission rates are considered 'significant' according to ministry guidelines.**

The above emission rate is based on processing 1240 tonnes of wet waste per day, but a site approval was granted in early 2019 to **increase importing of up to 2500 tonnes (about double what is being presented for assessment) daily.** It is unclear if these emission amounts should be doubled, essentially making many of the acknowledged noxious gases well above the legal limit. The impact from increased trucking, air quality, noise, safety etc are all significant.

Coronation Organics Response: The MECP Emissions Summary and Dispersion Model Report Guidelines require a screening to determine if a contaminant needs to be modelled using a dispersion model. If a contaminant is "significant" it simply means that the contaminant is modelled to determine if it will have an impact on-site. As shown above, all of the contaminants being emitted from the facility that were considered significant or modelled with the dispersion model were below the Ministry Limits for each contaminant.

The process of anaerobic digestion captures both methane gas and carbon dioxide gas (called biogas) which is naturally emitted when organic material decomposes. This gas would be released to the atmosphere if the organic materials were brought to a landfill that does not have landfill gas capture or brought to other end uses. The biogas that is generated at this facility is not a production of new greenhouse gases. The biogas that is captured is cleaned to separate the methane gas from the carbon dioxide gas – the methane is now able to be used as renewable natural gas, offsetting fossil natural gas. As methane gas is a greenhouse gas that is much more potent than carbon dioxide, this process will significantly reduce greenhouse gas emissions compared to the status quo of treatment.

The Emission Summary and Dispersion Modelling Report is reviewed by an Air Specialist at the MECP to ensure that it adequately models emissions from the facility and meets air quality standards for the Province of Ontario.

Unconventional gas development can affect local and regional air quality. The MECP summary and dispersion model states that CO₂ emissions will exceed the Ministry's Limit by 300%. At a time when global warming is recognized as a real and present threat to the planet, the combined greenhouse gas emissions from this plant 24/7/365 should be of concern. Even though the MECP dispersion model shows the six of the contaminants listed in the amended Environmental Compliance Agreement (ECA) were below the maximum Ministry Limits for each contaminant, the cumulative/combined effects of all of these on air quality and human health needs to be calculated.

The ChemTRAC study (1919) found air releases of toxic non-cancer agents in our community are already the highest in all of Toronto. These include pulmonary, cardiovascular and developmental toxicants among others. Coronation industrial Park was also among the areas with highest releases of cancer-causing agents. If the largest bio-gas plant in Canada is permitted to locate here, the combined / cumulative releases from the bio-gas plant, the six chemical plants and the wastewater treatment plant, will result in increasing toxic levels of the contaminants in local and regional air. TRS/H₂S is extremely toxic at low doses, and particulates/soot are one of the six chemicals that will be released by the bio-gas plant, and are toxic to health. Exceedances of the protective reference benchmarks for particulates were noted for 24 hr exposures in a human health risk assessment (intrinsic 2015) undertaken as part of an environmental assessment here. The trucks used in this operation are diesel meaning the levels of particulates will be even higher.

A large number of people could be negatively affected by this plant on our doorstep. Health effects from chronic multi-media exposures will lead to great costs to the health system with associated social costs from other impacts affecting the community. Ethically, these factors must be taken into consideration by Ontario's air quality standards. and via a Health Impact Assessment for the community.

Concern 10: In March, a brief notice outlining this huge project was sent to only a few residents immediately adjacent to the project site. However, the significant environmental impacts of this project will be felt by residents all the way to the 401. Because of COVID-19 we have all been self-isolating for the last two months. This has hindered the residents from hearing about, and learning details about this project (a copy of the text of the notice is included at the end of this petition)

CONCERN: BECAUSE OF COVID-19 WE HAVE ALL BEEN SELF-ISOLATING FOR THE LAST TWO MONTHS. THIS HAS HINDERED THE RESIDENTS FROM HEARING ABOUT, AND LEARNING DETAILS ABOUT THIS PROJECT.

Corona Organics Response: In December 2019 notifications were sent by Registered Mail to businesses and residents within a 300 meter radius of the facility. After submission of the ECA application, the MECP requested that further notification be sent to residents and businesses within a 500 meter radius of the facility. As such, this notification was hand-delivered to over 300 businesses and homes, often beyond the 500 meter notification request to ensure that all homes or businesses on a street received the notification letter.

In mid-March at the request of City Councillor Jennifer McKelvie, an additional letter regarding the project was compiled as well as an email address that can be used to contact the proponent with questions. A new website will be operational by mid-June that will help to alleviate the information flow. In addition, the website will offer a monthly newsletter as well as a contact page to allow the residents to ask questions. These queries will be answered within 2 business days.

We continue to work with the offices of City of Toronto counsellor McKelvie and MPP Thanigasalam to find additional ways to reach out to the community.

While the Proponent may have circulated a one-page notice with very limited and incomplete information on the proposal to some residences closest to the plant site in mid-March, this happened to coincide with the beginning of the COVID-19 Emergency shutdown that was declared on March 17th. As a result, there was almost no opportunity for the area residents to learn more details about the project and to share information with their friends and neighbours.

This will be the largest plant of its type in Ontario which will service the entire Province and will require a huge number of large heavy trucks to bring the decaying waste into the plant, and to carry the processed material out of the plant. The trucks will operate on a 24-hour basis for 365 days per year. Since the trucks will access the plant from the 401 via Morningside Avenue or Port Union Road, all the residents living south of the 401 from Morningside to the Rouge River will be affected.

Councillor McKelvie recognized this situation and suggested that a public meeting be held so that the Proponent could be available to share information, and answer questions from all the affected residents. However, because of COVID-19 this has proven impossible. It also has been impossible for residents to inspect all the supporting documents at the Ministry's office. It took almost three months for the Proponent set up a webpage to provide some basic information on the project, and to start trying to communicate with the residents

In short, the position of the affected residents has been severely compromised by the COVID-19 Emergency, which today is still in full effect. It is not acceptable for the Ministry and the Proponent to try and close off discussion on this proposal, while the emergency is still in effect.

However, due the efforts of a few dedicated residents living close to the plant, it was possible to try and share the limited information available via the delivery of fliers, and by posting an on-line petition, which now has reached the astounding total of 8000+ signatures. It is therefore evident that there is the strongest opposition to locating this plant in Westhill. It should be moved to a more appropriate site close to a 400 series highway.