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Dresden Landfill Comments
Environmental Assessment Branch
135 St. Clair Ave W
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Submitted via Environmental Registry of Ontario

**RE: Summary of Comments Related to the Proposed Designation under the
Environmental Assessment Act of the Proposed York1 Landfill and Waste
Processing Site - ERO Number 019-8417**

The County of Lambton, with the services of GHD, has reviewed the proposed designation under the *Environmental Assessment Act* of the landfill site and waste transfer and processing expansion, located in the former Town of Dresden, Municipality of Chatham Kent, posted by the Ministry of the Environment, Conservation and Parks (MECP) on March 26, 2024. It is understood that MECP is proposing a regulation that would, if made, designate the following activities as a project subject to Part II.3 under the *Environmental Assessment Act*:

- Re-establishing landfill operations, including construction of a new landfill cell, within the approved site with a theoretical approved capacity of 1,620,000 cubic metres for non-hazardous solid waste including construction and demolition waste and excess soil that are not reusable.
- Re-establishment and expansion of a waste transfer and processing station at the approved site for receiving, storing and processing up to 6,000 tonnes per day of solid, non-hazardous waste, including blue box material, construction and demolition waste, tires, asbestos, excess soil and organic waste.
- include any enterprise or activity ancillary to the project, in accordance with section 3(3) of the *Environmental Assessment Act*.

The following comments are prepared for consideration regarding the proposed designation.

The County of Lambton submitted letters on March 14, 2024 and April 9, 2024 to provide comments on two York1 ECA amendment applications under ERO numbers 019-8205 and 019-8313, respectively. These letters provide a detailed outline of specific concerns and outstanding questions regarding the two York1 applications, as they relate to the County of Lambton. Both letters are attached to further support this submission.

As noted in our previous letters, we have reviewed available information from York1 within the context of O. Reg. 50/24: Part II.3 Projects – Designations and Exemptions under the *Environmental Assessment Act*. We noted that both York1's landfilling and waste processing Environmental Compliance Approval (ECA) applications may contain triggers for an Environmental Screening under O. Reg. 50/24. Given that the original landfill at the Site was never subject to an Environmental Assessment, an Environmental Screening may not capture all potential impacts of the renewed site operations and a comprehensive Environmental Assessment would be more appropriate.

It is noted that York1 has submitted three separate applications for ECAs or ECA amendments for the Site (ERO numbers 019-8205, 019-8313, and 019-7917). We understand from supporting documents that York1 intends to apply for air and noise ECAs for the Site in the future. It is difficult to assess potential impacts to the Site and surrounding community, including impacts to Lambton County services, when applications are submitted separately. A comprehensive Environmental Assessment would allow for the complete assessment of site construction, operations, and decommissioning while considering the interdependencies between individual site components.

We had also previously noted incomplete or missing information from the following disciplines, outlined in greater detail in the attached submission letters:

- Hydrogeology
- Archaeology
- Aquatic ecology
- Terrestrial ecology
- Excess and contaminated soils
- Landfill gas emissions
- Traffic
- Socio-economic and land use

A comprehensive Environmental Assessment would require background studies that will address these information gaps and allow the County of Lambton to better understand impacts to County infrastructure and services.

It is noted that members of the public expressed a great deal of interest in York1's proposals and both open houses were widely attended. However, the County of Lambton also observed that a lack of detailed and consistent information available via

the publicly facing materials and open houses throughout the review process has created unnecessary confusion and speculation among stakeholders. Additional consultation opportunities through the Environmental Assessment process would allow members of the public, Indigenous Nations and communities, and relevant agencies to share feedback on York1's proposal.

Closing

The proposed operations at the Site will have a clear and direct impact on public services provided by the County of Lambton and associated local municipalities. The current information available is not sufficient to conduct a complete analysis of municipal and public impacts resulting from the submitted amendment. In addition, the piecemeal submission of multiple applications relating to the Site obfuscates the full and compounding nature of each of the site components.

Designating the York1 proposals at the Site as a project subject to Part II.3 under the *Environmental Assessment Act* will provide opportunity to conduct additional public outreach and municipal consultation to adequately recognize, compile, and address the resulting impacts from the changes noted in the ECA amendment applications. This is particularly relevant due to the magnitude of potential waste and traffic volumes included as part of the amendments, as compared to observed historical activity at the Site.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Jason Cole, P.Eng.
General Manager

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