

PUBLIC

Larry W. Douglas, B.A., LL.B.

Barrister and Solicitor

Notary Public

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22 Miller Street
Parry Sound, Ontario
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August 5, 2005

VIA FACSIMILE 416-314-8452

Catherine McLennon, Project Officer
Environmental Assessment & Approvals Branch
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

Dear Ms. McLennon:

Re: McDougall Landfill Site – Environmental Assessment

I have received a copy of the notice in the local newspaper indicating that the environmental assessment is being presented to your Ministry for consideration. I wished to write to raise my concerns as to the expansion of the McDougall Landfill Site and to raise objection to it.

My objections are on a personal level and also on a public level in terms of the larger community of the Parry Sound area. My wife and I own property on the Seguin River close to its entry into Mill Lake and have the potential of being impacted by any materials leaching into the river systems which are adjacent to the existing landfill site. We have a residence located on this property with a drilled well and two vacant lots for potential for our sons. My wife also owns a potential twelve-lot subdivision in the Municipality of McDougall which would have access by way of public beach areas to the Seguin River. We are also members of the Mill Lake Cottage Association which is approximately 50 plus cottages located on Mill Lake and the Seguin River, with the majority of them drawing drinking water from this river system with filtration systems to remove organic contaminants. I do have concerns that the expansion, which in effect doubles the capacity size of the McDougall Landfill, has all of the potential to impact the quality of life at our properties because of risk to the water supply.

In a larger view, I have a concern regarding the location of the McDougall Landfill Site and its potential on the drinking water system of the Town of Parry Sound. When you examine the environmental report, it places the immediate area of the landfill site under close examination and gives the impression that this is a remote, rather less populated area and that the impacts would be rather minimal. It is obvious with a land fill on an elevated area that gravity takes all fluids to a natural water course which will be the Oxley Swamp, Cramadog Lake, all of which have connections with the Seguin River. The Seguin River then flows into the larger water body of Mill Lake and then passes through the centre of Parry Sound. The water intake for the Town of Parry Sound comes from Georgian Bay approximately one kilometre from the mouth of the Seguin River. Any contamination

issues that find their way into the Seguin River have all of the potential of entering into the drinking water supply of Parry Sound.

I believe there should be some comment made as to the history of the McDougall Landfill Site as I have been involved as a cottage owner since the mid 1980's. I understood that there was no scientific reason for locating this private waste disposal site in its present location other than it was owned by a private waste company. It appears that licences to operate were issued by the Ministry of the Environment and that problems were arising in 1989 and the Ministry had a difficulty that it had to solve. Part of these problems involved the fact that this site was unsecured, and there were no records of what was dumped into it. The solution to remediate the site from the Ministry of the Environment was to force it upon the Township of McDougall and then have it take the responsibility for correction.

This chain of events was opposed by many of the Township residents who were impacted by the landfill site and the Reeve and Council at the time committed at public meetings that the only reason they would take over this landfill site was to remediate it and close it. Those commitments are acknowledged by two of the Council members on the present Council of the Municipality of McDougall. I had also expressed the view to the municipality that the Ministry had no legal authority to order them to take over this site as the problem was created by that Ministry and they were simply passing the buck to the Township to assume those obligations.

To its credit, the municipality has taken efforts to have the site cleaned up and most of the residents were of the view that the site was going to be closed. The present Mayor and Council, save and except, I believe, one Councillor, have now undertaken a change of course to essentially double the capacity of the landfill site. There is some reference in the report that the existing capacity will end at the expiration of 2005. I do take issue with that rather serious tone because I would suspect that there would be several years of life left in the McDougall Landfill Site if it was restricted solely to garbage generated by the residents of the Municipality of McDougall. I believe that the only reason that 2005 becomes a serious concern is because the municipality wishes to take in garbage from surrounding municipalities and of course generate revenues from tipping fees.

I am now concerned that this issue really boils down to a balance of priorities of economics and the evaluation of risk to the environment. It appears obvious that the municipality wishes a 25-year life expectancy to a landfill site because it will generate great potential for revenue to offset against municipal expenses and thereby reduce taxes or at least keep it on an even line. If my assumption is correct that the Municipality of McDougall has sufficient capacity for its own residents for a number of years, then the only motive for expansion would be to accommodate other municipalities and generate revenue. On the other side of the balance is the potential risk that this site would then present a health risk to those in the immediate area which I believe includes everyone downstream including the residents of the Town of Parry Sound. Since the difficulties of Walkerton, most citizens of this Province believe that we do not tolerate risk issues with drinking water. As a resident of the municipality I would be quite prepared to pay higher taxes but know that my drinking water and the enjoyment of our recreational area was safe and free of contaminants.

In the search for an alternate landfill site, the report refers to the concept that waste disposal solutions should be dealt with locally provided that all of the host communities will agree with it. That construction I think may create some fault in the environmental protection program. The report indicates that our area in the Cambrian Shield is literally dotted with lakes, rivers, swamps and streams. All of these are water bodies that the Province commits to provide and preserve clean water. I raise the question that in such areas the concept of local waste landfill sites may be completely

inconsistent with the policies of clean drinking water. This does leave the issue of export of landfill materials to other areas that are appropriate without endangering drinking water supplies. The report indicates that this could substantially increase by 55% the expenses for waste removal, but on the other hand, any breach of leachate that contaminates the water system as in the Walkerton issue, would many times increase the cost factor that the Province would be having to deal with.

I note from the report that it tends to focus itself primarily on this site and the impact to neighbours. It is obvious from the need to zone certain adjacent properties into a holding zone, that it demonstrates the existing technology of containment of leachate is not working with 100% effectiveness. If it was, then there would be no need to hold development on adjacent properties, which abut directly on the banks of the Seguin River.

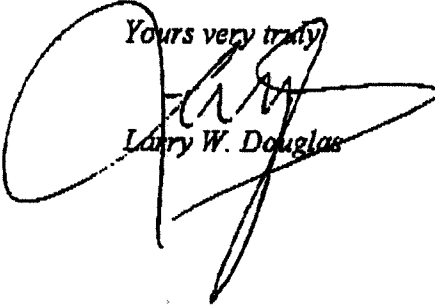
The position of containment now seems to be ditches to control surface water and leachate wells to gather up any material that comes out of the containment cell by way of liquid. I assume in the past that this leachate migrated across the McDougall Road and then contaminated the Oxley Swamp which ultimately has connection with Cramadog Lake and the Seguin River. I have personally seen red material flowing through this swamp area and into the Seguin River itself. The leachate wells seem to be a solution whereby the material is then placed in a tanker truck and I believe driven to the sewage treatment plant in Parry Sound. My concern at this point is that leachate is now not proceeding along the water course of the Seguin River, but is being transported directly into Parry Sound. I am not a chemist, but I would imagine that leachate is a solution of chemicals. I believe that the Town of Parry Sound has a treatment facility to treat organic waste material. I have a concern as to whether leachate dumped into that treatment plant receives anything that can effectively deal with it. It is probable that simply chlorine is added to the chemical cocktail and it is ultimately discharged into Georgian Bay. The outflow of the Parry Sound sewage treatment plant is approximately one kilometre away from the mouth of the Seguin River but in the opposite direction to the water treatment plant. The entire bay where the Seguin River enters into Georgian Bay is somewhat contained by islands and the possibilities exist for those waters to be drawn into the water treatment plant. I have been advised that water testing has been done through the Seguin River and in Mill Lake and the results seem to be satisfactory. In view of the fact that leachate is being transported into the treatment plant in Parry Sound, I am wondering if anyone has conducted any water studies as to any change in effect since that policy has been commenced as to water quality where the treated leachate is returned to Georgian Bay.

The chief concern I have in this expansion proposal for the landfill site is what will it do to the quality of our water supplies? I was somewhat involved in the proposals for the City of Toronto megadump a number of years ago. In fact, one of the proposed dump sites for Toronto was being proposed across the rural road from my wife's parents' farm. Upon examination of the criteria for selection for dump sites, it became obvious that this site was well within the headwaters of a conservation authority designated by the South Simcoe Conservation Authority. That waterway was to Bogartown Creek which emptied into the Holland River which passed through the Holland Marsh and into Lake Simcoe. When that criteria was raised as to the proximity of a water body that site was no longer given consideration. I now question why any landfill site would be given consideration when it essentially sits on the banks of a waterway servicing the major community in the Parry Sound area. Any escaping leachate from this site is going to end up invariably into those water systems. It would seem to me that the McDougall Landfill Site keeps being chosen as the ideal solution, but I am suggesting that it is simply the path of least resistance to be able to provide a local landfill site. It is probably far easier to argue that this site can continue although it has a faulty origin as opposed to trying to develop a new site.

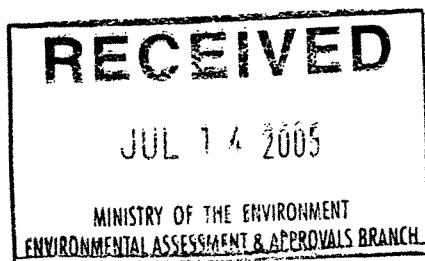
The entire economy of Parry Sound draws its origins from tourism, cottagers and service of this particular industry. The common denominator for this industry to exist is the recreation from the rivers, lakes and Georgian Bay. If anything jeopardizes the water quality of those areas, then it has drastic repercussions to the local economy and health issues.

I would submit that the proper course of action to deal with landfill materials in this area would be for the municipality to restrict the McDougall Landfill Site to its residents only and thereby carry it on for additional years of containment. This would follow the original commitment of the Township in 1989 to remediate the site and have it closed. For other municipalities that do not wish to have landfills in their particular areas, they should consider the issue of export, bearing in mind the close proximity of all waterways. In the long run, the Municipality of McDougall will have to consider the same issues.

I wish to be informed as to the decision of your Ministry and as to what steps would then be further undertaken.

Yours very truly

Larry W. Douglas

LWD:sv



58 Burnside Bridges Rd
Parry Sound

Mailing address:
12 Rambert Cres
Toronto, ON
M6S 1E6
416-766-6577
705-774-9413
bluehat001@sympatico.ca

July 11, 2005

Catherine McLennon
Environmental Assessment & Approvals Branch
2 St. Clair Avenue West, Floor 12A
Toronto, ON M4V 1L5


Dear Catherine McLennon,

If McDougall Township were looking to build a new landfill site, would the existing one pass the criteria for a present day site?

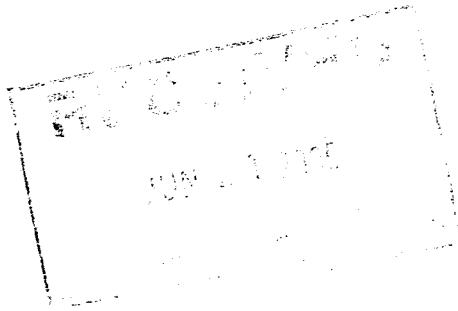
In the time when the existing site was built, it was considered to be a good thing to be in a sandy, porous area. Taking into account all the disasters that have happened with this situation, nowadays, a sandy area such as the McDougall site isn't considered to be advisable at all.

If necessary, we could sample the water for heavy metals etc above the site and below the site.

I do not think it is in accordance with environmental standards to expand and continue to make available to other communities an already questionable site.



J. Covington



William Cross
12 Rambert Cres
Toronto, Ont
M6S 1E6
416-766-6577
billcross@sympatico.ca
bluehat001@sympatico.ca

June 15, 2005

Environmental Assessment and Approvals Branch,
Ministry of the Environment,
2 St. Clair Ave W, Floor 12A
Toronto ON
M4V 1L5

Dear Catharine McLennon, project officer:

It has come to my attention that McDougall Township is expanding the McDougall Township Land Fill Site, which is located a few kilometers east of the Town of Parry Sound along the Seguin River.

I also understand that the Provincial Government will be making its decision regarding the dump expansion proposal on August 8/05.

My concerns, and the concerns of a growing group of citizens, are listed below:

- A) Several decades ago toxic effluence leaked through the containment liner at this site and created an ecological disaster to the Seguin River, Mountain Basin Lake, Mill Lake, and surrounding area.
- B) Rather than close the site and find a location that is away from a major water supply, the proposal is now to expand the dump at the present location, knowing full well that any problem will again contaminate a vital water system for a heavily populated area.

- C) There appears to be no contingency plan in place if/when a leak occurs again. The first sign of a problem will be noticed after the water supply has already been contaminated.
- D) The proposal to expand is not simply for local garbage needs, but appears to be an attempt to handle garbage from other districts, much in the same way that Michigan handles Toronto's garbage.
- E) Local governments do not appear to be putting much emphasis in communicating the facts about the proposal. Nor do they appear interested in informing the local population about the risks involved.

I would greatly appreciate you keeping me informed as to the status of this proposal and your views on the subject.

Sincerely,

A handwritten signature in cursive script, appearing to read 'William Cross'.

William Cross

July 20, 2005

**QUESTIONS AND COMMENTS THAT REQUIRE A REBUTTAL
RE MCDOUGALL TOWNSHIP LANDFILL SITE EXPANSION
PROPOSAL – REFERENCES ARE TO THE ENVIRONMENTAL
ASSESSMENT (EA) OF MUNICIPALITY OF MCDOUGALL
PROPOSED LANDFILL EXPANSION**

Questions:

- 1) There was nothing in this EA to suggest that any ground or surface water tests have been done for the standard 4 groups of toxic chemicals (heavy metals, pesticides, PCB's, VOC's). Would this not be a sound strategy to find out how successful the present dump is at containing the leachate?
- 2) According to this EA, lands within one kilometer of the Site will be impacted. (Vol 1, p. 104, 7.7) According to this EA, there are numerous, rivers, creeks, lakes and wetlands within 500 meters of the Site. (Vol 1, p. 102). The likelihood of contamination of the surrounding water systems appears significantly higher than LOW.
- 3) The Assessment also mentions that "the potential for surface water contamination increases with the number of watersheds which receive water flow from a site." (Vol 1, Table 8.1) Numerous watersheds appear to make the present Site inappropriate as a landfill site, and sheds much concern on expansion.
- 4) The Site sits atop a deposit of silt to medium sand w/gravel, and the site is 50 meters above the surrounding surface water level. (Vol 1, p. 102, 7.3) The proposal is to expand to the east and vertically, increasing the height of the Site. The type of material naturally found at the Site (silt, medium sand, gravel), is such as to allow an almost free flow of water into the surrounding water shed. Any unexpected leaks will quickly enter a number of water shed systems and quickly contaminate them, as has already happened in 1989.
- 5) According to this EA, Thermal Technologies is an increased risk to the environment, producing "concentrations of chemicals exceeding

the limits". Apparently there are no concerns that these same chemicals get in the ground or surface water because it is a non-hazardous solid waste site. Where would these chemicals come from that would be spewed into the air?

- 6) The transfer station at Hoddy Side Road is for bagged household garbage. I have never had the attendant check to see if what I am putting in the bags is appropriate. That means that toxic chemicals could easily be placed into the McLS by irresponsible citizenry.
- 7) According to this EA, "The Landfill is ...a local surface watershed divide, and surface water runoff would potentially drain in all directions off the Site." "...there are several small lakes, creeks, and wetlands within 500 meters of the Site...Seguin River, Agnes Lake, a wetland downstream of Agnes Lake, Cramadog lake...and (Oxley) Wetland...all waters in the area drain into this (Seguin) river...valuable fisheries exist in the Seguin River and Cramadog Lake." (Vol 1, p.102, 7.3)
- 8) Many of the lakes host cottages and resorts and are a major tourism attraction in the Study Area. (Vol 1, pg 22)
- 9) What is being done to fulfill the advice from this EA that "valuable fisheries" and "wetlands" be considered if expansion occurs.
- 10) The impact ratings put forth by this EA are HIGH, MEDIUM, LOW, NIL. The rating of NIL is never used. That means that in all categories there will be a certain impact on the environment.

EA study compiled by Biological Resources Solutions, Inc.

EA Ratings:

LOW – little impact on the component of the environment being considered.

NIL – no impact on the component of the environment being considered.

Submission by Bill Cross,

mailing address: 12 Rambert Cres,
Toronto, Ont
M6S 1E6

phone: 416-766-6577 (Toronto)

705-774-9413 (Parry Sound)

Email: billcross@sympatico.ca

August 3, 2005

(Supplement to letter of July 20, 2005)

**QUESTIONS AND COMMENTS THAT REQUIRE A REBUTTAL
RE MCDOUGALL TOWNSHIP LANDFILL SITE EXPANSION**

I have reviewed the regional Cancer Death Rates for Ontario in 2000. The source is Stats Canada. The first chart is from figures compiled by the Muskoka-Nipissing and Parry Sound District Health Council and the rate is:

202.7 per 100,000 people

This rate is the highest of any region in Ontario, of which there are 16. The average cancer rate in Ontario from this study is **180.5**

Toronto, by comparison, is **167.5**

The second chart is from figures compiled by the Muskoka-Parry Sound Health Unit and the rate is:

193.7 per 100,000 people

This rate is 10th highest out of 37 regions. The average rate in Ontario from this study is **180.5**

Toronto, by comparison, is **167.5**

Comments:

It must be pointed out that the McDougall Landfill Site is presently upstream from the drinking water for the Town of Parry Sound. Before expansion is

considered for approval, it would be prudent to try to determine why the cancer rates in this target region are higher than the normal Ontario averages (#1 out of 16 [DHC] and #10 out of 37 [PHU]).

Bear in mind that the Site, according to the **ENVIRONMENTAL ASSESSMENT of the MCDOUGALL TOWNSHIP LANDFILL SITE EXPANSION PROPOSAL**, is within 500 meters of watershed systems that supply water to the Town of Parry Sound (EA, Vol 1, p.102, 7.3) and the same Assessment admits that leachate could travel up to 1 kilometer in all directions from the Site (EA, Vol 1, p. 104, 7.7).

It would also be prudent to determine why the cancer rate in the target region is higher than Toronto rates, when historically Toronto's air and water have much higher levels of toxic contamination (common to all larger centres) than in more rural districts.

It has been argued that Parry Sound has a significant aboriginal population and this has created abnormally high readings. This however is incorrect. Except for a few examples, the cancer rate in aboriginal communities across Ontario and Canada is consistently lower than among white populations. That means that if the aboriginal figures were not included, the cancer rate in the target region among non-aboriginal peoples is more disturbing than the figures now show. In any case, the present figures should be a cause for concern.

It should be determined without a shadow of a doubt that

- a) the present McDougall Landfill Site is in no way responsible for the higher cancer rate in the region. This would require that a reason for the high rate be determined;
- b) It should be absolutely confirmed and guaranteed that any Site expansion will have no impact whatsoever on the already high cancer rate in the region;
- c) It should be guaranteed that no leak is possible from the Site in the future. Because of its proximity to water systems, any leak could have a catastrophic effect on the region.

If none or only some of the above determinations can be met, approval of the expansion might put a considerable number of people at risk.

Submission by Bill Cross,

mailing address: 12 Rambert Cres,

Toronto, Ont

M6S 1E6

phone: 416-766-6577 (Toronto)

705-774-9413 (Parry Sound)

Email: billcross@sympatico.ca

P.S. There is also another study done by the Ontario Cancer Registry. I will be receiving a CD from this department in a few days. This should shed more light on cancer rates in the target region.

August 14, 2005

(Supplement #2 to letter of July 20, 2005)

**QUESTIONS AND COMMENTS THAT REQUIRE A REBUTTAL
RE MCDOUGALL TOWNSHIP LANDFILL SITE EXPANSION**

I have now reviewed the latest data regarding cancer rates in Ontario. The Ontario Cancer Registry is the source used by Stats Canada and is the source here. The rates in this study are cancer incidence rates. Ontario has been divided into 50 regions for comparative regional study.

In 2002, out of 50 counties and districts in Ontario, Parry Sound had the 3rd (third) highest cancer rate in the province of Ontario, with an incidence rate of 652.8 (per 100,000). Toronto's rate in comparison was 397.8 in the same year. That means that residents of Parry Sound, in the year 2002, had a 64% greater chance of contracting cancer than residents of Toronto.

In 1979 the rate in Parry Sound was 397.1, but by the mid-nineties it had jumped to 618.7. Over the next decade it has climbed to the present rate of 652.8.

Although it was hoped that a more detailed study would show that Parry Sound has an acceptable cancer rate when compared to other regions, in fact the opposite is true. This more detailed view of cancer in Ontario by smaller regions has shown that the cancer rate in Parry Sound is disturbingly high.

Re Ontario First Nations cancer rates inflating the cancer rate figures for the Parry Sound area, a study by Marrett L. D. and Chaudhry M. (Division of Preventive Oncology, Cancer Care Ontario) entitled Cancer incidence and mortality in Ontario First Nations, 1968-1991 (Canada) is quoted here:

"Cancer incidence was significantly lower in FN (First Nations) compared to the general population for all cancer (rate ratio (RR) = 0.72 for females; 0.62 for males)."

The First Nations Cancer Research and Surveillance Workshop by L. Marrett of Cancer Care Ontario in 2003 showed the same results. The

Ontario FN rate from 1992 to 2001 was just above 200 per 100,000 while the Ontario rate in the same period was approaching 300.

This should shed significant light on the subject of the proposed expansion of a landfill site that is situated within 500 meters of 5 water systems upstream from the Town of Parry Sound, as stated in the Environmental Assessment (Vol 1, p. 102).

Submission by Bill Cross,

mailing address: 12 Rambert Cres,

Toronto, Ont

M6S 1E6

phone: 416-766-6577 (Toronto)

705-774-9413 (Parry Sound)

Email: billcross@sympatico.ca

ABORIGINAL PEOPLES

ACKNOWLEDGEMENT OF RECEIPT

For the Municipality of McDougall Landfill Expansion Environmental Assessment

UPON RECEIPT, PLEASE COMPLETE
BOXES/BLANK LINES AND RETURN BY FAX
TO:

Date Received

JUNE 21/05

Ministry of the Environment
Environmental Assessment & Approvals
Branch

Attn: Catherine McLennon
Special Projects Officer (A)

FAX: (416) 314-8452

2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5
TEL.: (416) 314-7222
catherine.mclennon@ene.gov.on.ca

Proponent: The Municipality of McDougall
Undertaking: Municipality of McDougall Landfill Expansion

First Nation: Wabigoon Nation

Reviewer: RICHARD HAY

Tel. No.: 705 756 2354

FAX No.: 705 756-2376

Please check the appropriate box:

☐ We will be able to provide comments to the Environmental Assessment & Approvals Branch
by: **August 5, 2005**
(Comments received after this date may not be considered in the approval process)

☐ We have no comments.

☒ We have no comments and do not require further involvement in this proposal.

Signature:

ACKNOWLEDGEMENT OF RECEIPT

For the Municipality of McDougall Landfill Expansion Environmental Assessment

UPON RECEIPT, PLEASE COMPLETE
BOXES/BLANK LINES AND RETURN BY FAX
TO:

Date Received

June 20/05-

Ministry of the Environment
Environmental Assessment & Approvals
Branch

Attn: Catherine McLennon
Special Projects Officer (A)

FAX: (416) 314-8452

2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5
TEL: (416) 314-7222
catherine.mclennon@ene.gov.on.ca

Proponent: The Municipality of McDougall

Undertaking: Municipality of McDougall Landfill Expansion

First Nation: Magnetawan First Nation

Reviewer: Chief Wilmer Noganosh

Tel. No.: (705) 383-2477

FAX No.: (705) 383-2566

Please check the appropriate box:

☐ We will be able to provide comments to the Environmental Assessment & Approvals Branch
by: **August 5, 2005**
(Comments received after this date may not be considered in the approval process)

☒ We have no comments.

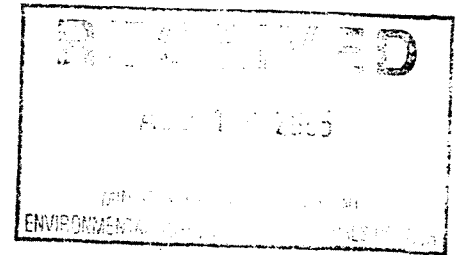
☐ We have no comments and do not require further involvement in this proposal.

Wilmer Noganosh
Signature



SHAWANAGA FIRST NATION

R. R. #1, Nobel, Ontario P0G 1G0
Tel: (705) 366-2526 • Tel: (705) 366-2576
Fax: (705) 366-2740



August 10, 2005.

Ministry of the Environment

Environmental Assessment & Approvals Branch

Attn: Catherine McLennon
Special Projects Officer

2 St. Clair Avenue West,
Floor 12A
Toronto, ON.
M4V 1L5
TEL: (416)-314-7222
FAX: (416)-314-8452

Dear Ms. Catherine McLennon;

Re: Municipality of McDougall Landfill Expansion

Please find attached to this letter a summary that was forwarded to my attention by:

Mr. Ray Alatalo- B.A.A., C.P.H.I.(C)
Environmental Health Officer
Health Canada
First Nations & Inuit Health Branch
402-128 Larch Street
Sudbury, ON.
P3E 5J8

Upon receipt of the document on June 20th 2005 I made a request for an intervention by Mr. Alatalo because of his professional expertise with aboriginal communities and of the "Federal & First Nation" relationship with Health Canada.

Initially, we had some concerns regarding the development or use of our traditional lands or hunting territory, such as wildlife impacts, water issues, traditional medicine plants and other vegetation within the vicinity of the proposed waste disposal site.

We intend to contact Natural Resources Solutions Incorporated with respect to plant and vegetation listed in the report which might clarify our concerns of flowers, plants, roots and other vegetation for traditional purposes.

Before concluding we are aware that (*Comments received after August 5, 2005 may not be considered in the approval process*) nevertheless, we strongly consider it very important in light of bridging those gaps between area Municipal governments and area First Nations leadership.

In the spirit of co-existence,

A handwritten signature in black ink, appearing to read 'H. Pamajewon', with a horizontal line extending to the right.

Chief Howard A. Pamajewon

c.c. Ray Alatalo – Health Canada



(705) 671-0760 Fax (705) 671-4112

August 5, 2005

Your file Votre référence

Chief Howard Pamajewon
Shawanaga First Nation
RR#1
Nobel, ON P0G 1G0

Our file Notre référence

Dear Chief Pamajewon:

**RE: ENVIRONMENTAL ASSESSMENT - MCDOUGALL WASTE DISPOSAL
EA FILE NO. EA 02-08-01**

My apologies for the delay in responding to the above noted Environmental Assessment, but I have reviewed the document and offer the following for your consideration.

With respect to the Scope of the project, this application is for the expansion of the existing landfill operation *within* the existing boundaries of the landfill site located on McDougall Road. As such, the significance of the undertaking is limited to the area already previously affected by aggregate activities in the same area. The anticipated 678,738 cubic metres of waste volume represents a 25 year, uninterrupted supply of non-hazardous solid waste disposal for the municipality and it's partner municipalities.

The site is undergone a significant engineering assessment for surface and groundwater impact assessment and mitigative measures are being actively monitored by the Ministry of Environment with respect for protection of these water resources. Other natural resources such as wildlife and significant vegetation has been outlined in the report, and the significant biological resources are outlined within the Primary Study Area by Natural Resources Solutions Inc.. Significant vegetation listed in the report (page 23) include:

- Leatherleaf - Chain fern/St. John's-wort Shrub Fen
- Dry - Fresh Hemlock - Oak Mixed Forest
- Common Juniper Acidic Shrub Rock Barren Type
- Acid treed Talus Ecosite

Since I am not familiar with the value of these species with respect to traditional medicine, their significance is raised for your review. Similarly, I would suggest that contact with the Natural Resources Solutions Inc. (519) 725-2227 may be worthwhile for a more detailed listing of biological

resources of the study area (See Appendix C - Volume II).

Overall, the report is complete in that it clarifies the validity of this proposal in lieu of other alternatives. There are significant operational limitations to provincial landfill operations, and as was discussed in this report, there are no other economical solutions to the landfill needs of McDougall Township and the partner municipalities. Since your community makes use of the North Area Landfill #9, this undertaking does not specifically affect the non-hazardous landfill needs of your community. Nonetheless, an awareness of the project is fruitful to the protection of our natural resources, and I have no recommendations to offer with respect to this undertaking.

If you have any questions regarding this matter, please contact the undersigned to discuss, and I will return your copy of the reports upon my next visit to your community. Please note that public comment on this proposal is due today, and I have attached a copy of the original letter should you wish to submit formal comments.

For healthier communities,

A handwritten signature in black ink, appearing to be 'RA', written over a horizontal line.

Ray Alatalo, B.A.A., C.P.H.I. (C)
Environmental Health Officer
Health Canada
First Nations & Inuit Health Branch
402 - 128 Larch Street
Sudbury, Ontario
P3E 5J8

RA/mg

cc: Ralph Condotta, Sr. EHO

-----Original Message-----

From: Elizabeth Sandy [mailto:chief@moosedeerpoint.com]

Sent: Wednesday, August 31, 2005 10:22 AM

To: Kozak, Mark (ENE)

Subject: McDougal Landfill Expansion EA

Mark:

Please be advised that Moose Deer Point First Nation has no comments with respect to the McDougal Landfill Expansion EA.

Have a great day

Elizabeth (Betty) Sandy
Chief

Moose Deer Point First Nation
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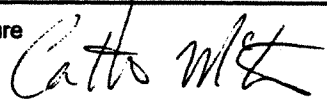


Ministry
of the
Environment

Ministère
de
l'Environnement

Environmental Assessment & Approvals Branch

File No. EA-02-08

| Identification | | Conversation With | |
|--|------------------------------------|---|------------------------------|
| Name Catherine McLennon | Name Chief William Restoule | | |
| Section EA Project Coordination | Organization Dokis First Nation | | |
| Telephone No. 416-314-7222 | Telephone No. 705-763-2200 | | |
| <input type="checkbox"/> Incoming Call <input type="checkbox"/> Outgoing Call <input type="checkbox"/> In Person | | Time 8:30 | Date September 1, 2005 |
| RE: McDougall Landfill Expansion Environmental Assessment (EA) | | | |
| On my behalf, Mark Kozak, a co-op student, called Dokis First Nation to see if they had any comments about the above noted EA. A message was left by Chief Restoule on Mark's voicemail stating that Dokis First Nation had no comments. | | | |
| | | Signature  | |

APPENDIX D

MUNICIPALITY OF MCDOUGALL WASTE DISPOSAL SOLUTIONS

ENVIRONMENTAL ASSESSMENT

JUNE, 2005, EA REPORT

SUMMARY OF PUBLIC/AGENCY REVIEW COMMENTS AND RESPONSES

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| Source | Comment | EA Report Reference | Response |
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| Memo from Catherine McLennon (MOE EAAB Project Officer) to Douglas Robertson (CRA) (August 12, 2005) | 1. For comparative purposes do the diversion programs (and applicable rates) for the partner municipalities also include the diversion of scrap metals, wood and tires as provided for McDougall? | Page 64 | 1. Yes. As noted in Section 4.3.1 of the EA Report the 1990 Parry Sound and Area Waste Management Systems Plan included McDougall's diversion programs and rates in comparison with those of the other area municipalities. The comparison of "Alternatives to" for this EA reflects those earlier data and incorporates them in an updated form, into the comparative evaluation for this EA. |
| | 2. The 4 th last paragraph, last sentence, is incomplete. | Page 61 | 2. "The Municipality of McDougall currently participates" should read: "The Municipality of McDougall currently participates in a waste separation and recycling program. Materials used for reuse or for recycling are separated out." |
| | 3. It is stated that composting is the only feasible enhanced waste diversion strategy. Is this being contemplated as a way to minimize the amount of waste to be disposed of? | Page 62 | 3. Yes. The Municipality of McDougall is committed to enhancing its waste diversion programs where possible and feasible, including the diversion of organics from the waste stream. This includes the continuation and expansion, where possible, of home composting units. |

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| 4. | The "export" description references the alternatives to of "landfilling" rather than "export". Also, only primary study area is referenced, what about the Secondary Study area (this is also true for other environmental components)? | Page 77 | 4. | <p>Comment one noted. "The "Alternative To" of landfilling within the Primary Study Area..." should read: "The "alternative to" of <i>exporting</i> waste from the Primary Study Area..."</p> <p>As described in S. 1.6.2, the Secondary Study Area, consisting of other landfill sites elsewhere in the Districts of Parry Sound and Muskoka, and in private landfill sites located elsewhere in Ontario, would be impacted if "Export of Waste" was chosen. Since "Export of Waste" was not the preferred "alternative to", it was not carried forward for further evaluation in the Secondary Study Area.</p> |
| 5. | The "do nothing" description references alternatives to 'landfilling' rather than 'do nothing' | Page 77 | 5. | <p>Comment noted. "The "alternative to" of landfilling within the Primary Study Area..." should read: "The "Alternative To" of "Do Nothing" within the Primary Study Area..."</p> |
| 6. | What is the rationale for the "1.5 times increase is considered a substantial increase in the current level of spending"? | Pages 85 and 92 | 6. | <p>As described in S. 5.1 of the EA Report, the Screening Criterion of Economic Feasibility was assessed based on the ability of McDougall and participating parties to afford to implement the alternative without substantially increasing the funding currently allocated to waste disposal services. The present annual cost of solid waste disposal, as described, is \$450,000. An increase in annual cost of waste to \$675,000 or 1.5% was considered a substantial increase. As noted in S. 5.7 of the EA report, the % increase over existing annual costs are as follows: 15% for landfilling, 65% for thermal technologies, 55% for export to waste and enhanced waste diversion and the "do nothing" alternatives were not economically feasible. See also Response # 20.4.</p> |

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| 7. | The rationale for the alternative methods of expanding the McDougall landfill is needed. | Page 98 | 7. | <p>Rationale for Alternative Methods:</p> <p>Following completion of the Screening of a range of "Alternatives To", which led to the identification of the expansion of the waste disposal capacity of the McDougall Landfill Site as the Preferred "Alternative To", several "Alternative Methods" of expanding the capacity of the Site were identified.</p> <p>Seven "Alternative Methods" chosen for comparative evaluation were identified and evaluated on the basis of their ability, alone or in combination, to accommodate all or as much as possible of the required waste disposal capacity identified under the EA Purpose and Description of Need and to do so in compliance with all applicable industry and engineering design standards, as well as all relevant statutes, regulations, policies and guidelines.</p> <p>Prior to evaluation, it was anticipated that each Alternative Method would have its own strengths and weaknesses, its own advantages and disadvantages, and its own potential environmental effects and that, relative to the others, one or more would emerge from the evaluation process as the Preferred Alternative Method(s).</p> |
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| 8. | Has a road inventory been done since 1998? | Page 105 | 8. | <p>No. However there have been no new developments along McDougall Road since the Site was established (and none are planned by either the Township or by private proponents). As a result, there have been no significant increases in the level of traffic along the road between the Site and Hwy. 400 in the ensuing years, nor will there be for the foreseeable future. As noted in the EA Report waste hauling vehicles number only about 15 packer trucks and 2-3 private vehicles per day, a very small proportion of existing traffic flow, of 200-399 vehicles per day, which consists almost entirely of personal vehicles traveling to and from residences and cottages located further to the east of the Site. The number of waste hauling vehicles will not increase significantly during the Site's operating life.</p> |
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| 9. | <p>Less subjective explanation of the scores for the comparative evaluation of alternative methods is required. Stating that the scoring is based on experience and site knowledge does not allow the reader to trace the decision-making of the proponent. This traceability is also important as the total scores for several of the alternative methods were close.</p> | Page 109 | 9. | <p>The scoring of the seven "Alternative Methods" was based on the respective data sets applicable to each of the Comparative Evaluation Criteria. As noted in Sec. 8.2 (page 109) of the EA Report scores from 1 to 5 were assigned to each of the Alternative Methods under each of the 13 criteria with each scoring being based objectively on the potential for each of the Alternative Methods to affect the segment of the environment reflected by the criteria, with 5 being a low potential for effect (therefore yielding the highest desirability for implementation of that Alternative Method component) and 1 being a high potential for effect (therefore yielding the lowest desirability for implementation of that Alternative Method component). While another reader could conceivably arrive at slightly different individual scores under the 13 criteria and among the 7 Alternative Methods, by the time the scores for each Alternative Method are summed any such differences are reduced to the point where the overall ranking of the Alternative Methods is not affected.</p> |
| 10 | <p>The environmental monitoring plan also must monitor commitments made throughout the EA (not just the commitments listed in Section 10.0) and during the EA review Period.</p> | Page 125 | 10. | <p>Comment noted. The Environmental Monitoring Plan will monitor the implementation of any commitments made during conduct of the EA (e.g. in response to review comments by Agencies, the public and First Nations) as well as those listed in Section 10.0 of the EA Report.</p> |

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| Memo from Stephanos Habtom to Catherine McLennon (July 29, 2005) | 11 Review comments on the draft EA, dated February 2005 are still outstanding with the exception of comment #2 and comment #5, which have been addressed. | Section 9.1, Page 111 | 11. Presumably this comment refers to Senior Water Engineer Stephan Habtom's March 16, 2005, memo to Catherine McLennon, in which he provided comments on: (1). the EA's Screening Criteria; (2). Identification of Alternative Methods; (3). Comparative Evaluation of Alternative Methods; (4). leachate collection and treatment; and, (5). an editorial comment about the cover of the EA Report. The Table entitled Summary of Public/ Agency Review Comments (provided as Appendix I, in Volume II to the EA Report) includes detailed responses to all of these 5 comments (pages 8 and 9 of 48). No further response and no change to the EA Report is required. |
| 12 | Section 9.1 indicates that CRA previously evaluated various waste footprint expansion alternatives for the McDougall Landfill Site in a report entitled "Engineering/Planning Evaluation and Cost Assessment" prepared in February 2003. It is critical that this document be made available to me to evaluate the comparative evaluation scoring provided in Table 8.4 of the EA document and evaluate the potential impacts of each alternative method. | Page 111 | 12. Five copies of the document "Engineering/Planning Evaluation and Cost Assessment" (February, 2003) have been provided to the EA Project Officer. |
| 13 | The EA does not include any discussion on leachate collection, treatment and disposal alternatives. The EA needs to identify the potential amount of leachate that will be generated if the selected expansion alternative is implemented and provide comparison of available leachate treatment and disposal alternatives based on environmental impact, technical feasibility and economic feasibility of the available alternatives. | Page 117 | 13. The proposed leachate collection and treatment system is the same for all the Alternative Methods and has been described in the "Compliance Plan" and "Leachate Treatment System Conceptual Design Report", both of which have been the subject of comprehensive discussion and negotiation with MOE technical staff (North Bay/Sudbury). |

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| <p>Memo from Ed Snucins (MOE Surface Water Specialist, Northern Region) to Catherine McLennon (July 27, 2005)</p> | <p>14</p> | <p>The inventory of aquatic biota in the vicinity of the landfill relied heavily upon available data, which were not necessarily up-to-date, and no data were provided for some features. In particular, surveys should have been done to characterize the aquatic biota in the surface waters that were identified as receiving drainage from the site: (a). the intermittent stream that drains to the Seguin River; and (b). the large wetland located along McDougall Road. Those features were identified in Appendix D, but should also be marked on the figures.</p> | <p>N/A</p> | <p>14.</p> | <p>Although some of the background data available from the MNR may be somewhat dated, they nonetheless provide some information on fish communities in the vicinity. The field reconnaissance was used to provide more site specific assessment of habitat potential. Due to the timeframe of the study, conservative approaches were used for the identification of potential fish habitat, even in locations where intermittent flows appeared to limit the likelihood of fish. In the assessment of the potential for impacts all of the areas considered as providing possible fish habitat were treated as fish habitat. Fish community assessments of some locations (for example the wetland along McDougall Road may have identified fish present as per our assessment, or revealed that no fish were present at the time of sampling). In order to take the more conservative approach as well as to deal with the limited study timeframe and seasonal variations, we have assumed that fish communities are present in these watercourses.</p> |
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**MUNICIPALITY OF MCDOUGALL WASTE DISPOSAL SOLUTIONS
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| | 15 The net effects on surface waters and aquatic biota were predicted to be low after implementation of mitigation and contingency measures, but there was no description of the potential impacts of an uncontrolled release of contaminants. The assessment of overall risk should include consideration of the consequences of contaminant failure, even though the likelihood of it occurring is assumed to be low. Historical site contamination data should be presented to help illustrate the magnitude and spatial extent of potential effects. | N/A | 15. | It is noted that the standard operations of the proposed facility will include regular monitoring of possible accidental releases of compounds including potential contaminants. A spill/release containment protocol will be developed to minimize the extent of any accidental releases. In the event that this procedure is not initiated sufficiently quickly to ensure capture of contaminant releases, monitoring of potential impacts at the receivers will be conducted. It is anticipated that the spatial distance between the point of possible release and the receivers is sufficiently great to assist in mitigating negative impacts. The combination of low frequency of occurrence, spatial separation between the source(s) and receivers, as well as the history of past impacts to the possible receivers suggest that the likelihood of significant negative impacts to the receivers will be very low. |
| Memo from Frank Driscoll (MOE Sr. Environmental Officer, Timmins/North Bay Area Office) to Catherine McLennon (August 1, 2005) | 16 North Bay Office of MOE has no objections to Environmental Assessment approval of the proposed expansion of the existing landfill site as the preferred waste disposal solution set out by the Municipality of McDougall in the document. The document adequately addresses the previous district office concerns and comments put forward upon review of the draft document. | N/A | 16. | Comment noted. No response and no change to the EA Report is required. |

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| Memo from Jim Hiraishi (MOE WMPB) to Catherine McLennon (August 5, 2005) | 17 | The Waste Management Policy Branch has no further comments to make at this time. | N/A | 17. | Comment noted. No response and no change to the EA Report is required. |
| Memo from John Kowalewski (MOE Sr. Engineer, Noise & Air) to Catherine McLennon (August 10, 2005) | 18 | One of the objectives of the EA is to identify and evaluate potential noise effects due to the proposed operations of the above-noted facility. A previous noise review of the draft report was found to be incomplete (refer to memorandum dated March 15, 2005). | N/A | 18. | As noted in the EA Report (Section 9.9, page 119): "The proposed expansion of the Site's waste capacity is not expected to create an increase in noise levels that cannot be mitigated by general operational controls at the Site. A detailed noise assessment will be conducted as part of the required EPA level approvals for this undertaking." No further response and no change to the EA Report is required. |
| | 19 | The subject report has identified audible noise as part of the potential environmental effects for evaluation and possible mitigation. Based on the current operations at the site and the land uses in the surrounding area, the report indicates that the anticipated environmental effect due to the proposed facility is expected to be low. However, this report does not provide detailed noise information for review but it indicates that a detailed noise assessment will be submitted at the approvals stage under the EPA requirements. Therefore we expect to review the application for approval for the subject site, including a detailed noise assessment for compliance with MOE Noise guidelines, once it is submitted. | N/A | 19. | Comment noted. Noise will be dealt with in the Design and Operations Plan for the proposed capacity expansion and will, of course, be subject to detailed review and approval under Ministry noise guidelines and regulations. No further response and no change to the EA Report is required. |

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| Memo from Greg Washuta (MOE Sr. Waste Engineer, Waste Unit) to Catherine McLennon (August 5, 20 | 20 | 20.1 Text estimates the amount of waste to be generated over a 25-year period to be 678,738 cubic metres. The EA document does not [provide] the basis for how this number was determined. The document should include the annual amount of waste to be handled, the waste generation per capita for current population, waste generated per capita considering the seasonal population, future growth rates and yearly waste generation. Values for waste density and ratio of waste to daily cover material should also be provided. | Executive Summary | 20.1 | The basis of the 678,738 cubic metre figure is described in detail in the report: Engineering Planning Evaluation and Cost Assessment, February, 2004", copies of which have been provided to the Ministry. No further response and no change to the EA Report is required. |
| | 20.2 | Text reads: "Ontario's long-term prosperity, environmental health and social well-being". Text should read: "Ontario's long-term prosperity, environmental health and social well-being". | Page 42. S. 3.8 | 20.2 | Comment noted. Text should read "Ontario's long-term prosperity, environmental health and social well-being". |
| | 20.3 | Text refers to "Canadian Waste Moose Creek Landfill". Change to read: "Lafleche Environmental Inc.'s Moose Creek Landfill" | Page 70. S. 4.4 | 20.3 | Comment noted. Text should read "Lafleche Environmental Inc.'s Moose Creek Landfill". |
| | 20.4. | What is the basis for using greater than 1.5 times the current level of spending on waste disposal services as a substantial increase? | Page 85, footnote at bottom of page | 20.4 | The 1.5 figure was developed in consultation with the Municipality of McDougall and reflects the Municipality's waste disposal costs within the context of current revenues and expenditures and what future waste disposal costs the municipality anticipates it can reasonably and responsibly accommodate within its potential future fiscal horizons. |
| | 20.5 | A schematic or a drawing should be provided to illustrate the engineering advances that have led to significant improvements in site performance and environmental protection for waste disposal. | Page 88, S. 5.7.1, Landfilling, fourth bullet points. | 20.5 | See comment 20.8, below. These details may be found in many of the historic Site documents. Most, if not all, of these documents should be in the possession of the Ministry (either in Toronto or in the North Bay/Sudbury field offices). |

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| | 20.6 | What are the ongoing improvements in engineering design, construction and operation that will be employed at the proposed site? | Page 89, S. 5.7, Landfilling, first bullet point | 20.6 | These are detailed design issues that form part of the upcoming Design and Operations Plan and EPA CofA amendment application. No further response and no change to the EA Report is required. This project will use the best engineering designs and landfilling protocols available in the industry today. Innovative design protocols with respect to cell geometry, site life and enhancement of biodegradation and reduction of contaminating life span are proposed. |
| | 20.7 | The document fails to provide information on each of the proposed alternatives such as proposed height, proposed depth, proposed landfill area and method of waste placement (area versus trench method). | Page 98, S. 6.0, Identification of "Alternative Methods" | 20.7 | See Response # 20.6. |
| | 20.8 | As mentioned in the review of the draft EA document, this section does not indicate if there are suitable soils on site for the construction of the engineering landfill. The text speaks in general terms about the geology of the site area. Specifics such as borehole logs and test pit logs should be included in appendices to the EA document. | Page 100, S. 7.1, Geology | 20.8 | These are Site design matters that will be addressed in the detailed technical design to be completed for the Design and Operations Plan, in support of the EPA C. of A. amendment application. Nevertheless, it should be noted that the proposed capacity expansion area was previously used for waste disposal before the Site was mined and the waste placed in a new, lined cell. Stratigraphic logs and other geotechnical information for the Site are contained in the Annual Operating Reports for the Site and in several of the background reports prepared for the Site consolidation and new cell construction. Most, if not all, of these documents should be in the possession of the Ministry (either in Toronto or in the North Bay/Sudbury field offices). |

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| | <p>20.9 The text mentions that "landfill gas will be managed in accordance with the requirements of Part III S. 14 of O. Reg. 232/98".</p> <p>Section 14(1) of Reg. 232/98 states: A person shall not establish a new landfilling site or increase the total waste disposal volume of an existing landfill site unless a written report has been prepared in accordance with this section that contains the following: 1. An assessment of the potential for the migration of landfill gas in the subsurface. Plans, specifications and descriptions for the monitoring, control, collection, use or discharge of landfill gas at the site, if, on the basis of the assessment, any of these actions are necessary.</p> | <p>Page 115, S. 9.2, Air Quality, second paragraph.</p> | <p>20.9</p> | <p>This matter will be addressed in the Design and Operations Report which will be submitted in support of the EPA application for C. of A. amendment for the proposed capacity expansion. No change to the EA Report is required.</p> |
| | <p>20.10a The piggy back method of landfilling is referred to in this section. The preferred option would be to "piggy back" over the east slope of the existing landfill waste footprint. In the absence of design/engineering details, the MOE remains concerned about this approach. When assessing the potential environmental impacts due to landfill expansion over existing waste, the effects of the increased mass per unit of fill area on the contaminating life span, service lives, and contaminant transport must be evaluated as required by O. Reg. 232/98. The additional waste thickness must be shown to not adversely affect the natural environment, either through increased contaminant transport, potential instability, or adequacy of landfill facilities such as leachate contaminant / collection systems.</p> | <p>Page 117, S. 9.6, Design & Operations</p> | <p>20.10a</p> | <p>This matter will be addressed in the Design and Operations Report which will be submitted in support of the EPA application for C. of A. amendment for the proposed capacity expansion. No change to the EA Report is required.</p> |

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| | 20.10b Consideration must also be given to global and differential settlement caused by compression of existing waste under additional waste loading and its effects on newly-placed liners and leachate collection systems (it is good practice to instrument a landfill for determination of settlement with time before vertical expansion proceeds). | Page 117, S. 9.6, Design & Operations | 20.10b | This matter will be addressed in the Design and Operations Report which will be submitted in support of the EPA application for C.ofA. amendment for the proposed capacity expansion. No change to the EA Report is required. |
| | 20.10c Consideration must also be given to landfill stability of newly-placed waste and lining systems and the effects of increased loading on the global stability of the landfill, including the existing waste. | Page 117, S. 9.6, Design & Operations | 20.10c | This matter will be addressed in the Design and Operations Report which will be submitted in support of the EPA application for C.ofA. amendment for the proposed capacity expansion. No change to the EA Report is required. |
| | 20.10d The tying-in of engineered facilities such as liners and leachate collection systems between existing and new waste disposal areas presents challenges. It is unclear from the document if an engineered liner or leachate collection system will be constructed on several meters of solid waste. If this is the case, the design is not a preferred design since the suitability of solid waste as a foundation material is questionable. Significant total and differential settlement may be predicted to happen after the construction of an engineered system on the existing waste and placement of new wastes over the system. | Page 117, S. 9.6, Design & Operations | 20.10d | As per standard landfill engineering practice and in accordance with applicable landfill regulations the liner and leachate collection system will be installed before any new waste is placed in the capacity expansion. This matter will be addressed in the Design and Operations Report which will be submitted in support of the EPA application for C. of A. amendment for the proposed capacity expansion. No change to the EA Report is required. |
| | 20.11 As mentioned in the review of the EA document, a schematic of the composite liner system should be provided in the EA document. | Page 117, S. 9.7.1, Overall Groundwater Assessment, First para. | 20.11 | A schematic diagram could be provided but would be of limited value to the EA as it will be subject to change as a result of the EPA level work to follow. The final liner configuration will conform to industry standards and MOE design requirements and will be based in part on the hydrogeological impact assessments. Final design will, of course, be subject to Ministry technical review and approval. |

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| | 20.12 | The proponent should provide as appendices to the EA document any studies or reports completed to prove that any incremental increase in groundwater impacts due to the proposed expansion will be attenuated through engineered controls or mitigative measures. | Page 117, S. 9.7.1 | 20.12 | This matter has been addressed in the Compliance Plan and will be addressed, as appropriate, by the Hydrogeologic Evaluation Report and Design and Operations Report. No change to the EA Report is required. |
| | 20.13 | The proponent shall demonstrate that the performance criteria for groundwater protection in Landfill standard #10(2)(b) in O. Reg. 232/98 are met. | Page 117, S. 9.7.1 | 20.13 | This matter has been addressed in the Compliance Plan and will be addressed, as appropriate, by the Hydrogeologic Evaluation Report and Design and Operations Report. No change to the EA Report is required. |
| | 20.14 | Text reads: "A Compliance Plan (CRA, April 2005) has been implemented...." Text should read: "A Compliance Plan (CRA, April 2005) has been implemented." | Page 118, S. 9.7.3 | 20.14 | Comment noted. Text should read " Compliance Plan (CRA, April 2005) has been implemented. " |
| | 20.15 | The report indicates that "storm water management facilities will be capable of conveying and storing the runoff volume associated with the 100-year storm event". Section 4.9.2 Guideline (d)(iii) on page 61 of the Landfill Standards Guidelines of MOE, May 1998, were provided. Accordingly, the text should be revised to reflect the requirements of O. Reg. 232/98 | Page 120, S. 9.11.2 | 20.15 | This matter has been addressed in the Compliance Plan and will be addressed, as appropriate, by the Hydrogeologic Evaluation Report and Design and Operations Report. No change to the EA Report is required. |

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| 20.16 | Why is the groundwater flow system position within the flow system not applicable for Alternative Method 5 and 7? | Tables 8.2 & 8.3 Groundwater | 20.16 | <p>The objective of Alternative Method # 5 was to address the <i>concept</i> of accommodating the proposed capacity expansion at some other location elsewhere on-Site - not to identify <i>specific</i> alternative areas on-Site. The concept of locating the new waste capacity elsewhere on Site was rendered unacceptable for other reasons, noted in the EA Report. As such, a detailed description and discussion of groundwater pathway flow systems was rendered unnecessary (N/A). Similarly, groundwater pathway flow systems for Alternative Method 7 (Vertical) are identical to those for the other directional expansion methods and so a detailed description and discussion was rendered unnecessary (N/A).</p> |
| 20.17 | For Alternative Method 3 (north), it should be mentioned that the design would not meet the requirements under O. Reg. 232/98 for a 100 metre buffer zone on the west side. For Alternative Method 5 (new waste footprint elsewhere on site) it appears an adequate buffer zone would exist as shown on Figure 14. It is unclear for Alternative 7 (vertical expansion) what the term "would not comply with existing requirements for maximum slopes" means. Any landfill expansion would be subject to O. Reg. 232/98 requirements for final slopes, which at present are 5% to 25%. | Table 8.2 Design and Operation | 20.17 | <p>A vertical expansion within the existing footprint would require construction of slopes greater than 25% to achieve the required capacity. As such, meeting the capacity requirement solely through a vertical lift of proposed final contours would not meet the requirements of O. Reg. 232/98.</p> |
| 20.18 | Table 8.3 references Highways 401, 402, 403, 404, 405, and 406, which are not relevant to this particular site. The reference should be to Highway 400. | Table 8.3 | 20.18 | <p>Comment noted. The references to Highways 401, 402, 403, 404 405 and 406 are typographic errors. All should read "Highway 400".</p> |

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| | 20.19 | Text reads: "Letter to Catherine McLennon, Project Officer of the Ministry of Transportation" Text should read: " Letter to Catherine McLennon, Project Officer of the Ministry of the Environment." | Appendix H, Cover Page. | 20.19 | Comment noted. Text should read "Letter to Catherine McLennon, Project Officer of the Ministry of the Environment." |
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| | <p>20.20 Definitions should be provided for the terms "shred-fill method", "bale fill method", and "place and compact method".</p> | <p>Appendix H, Sub Appendix B, page 3.</p> | <p>20.20</p> | <p>The following definitions should be considered as part of the EA Report:</p> <p><u>"Shred-Fill Method"</u>:</p> <p>A method of landfilling whereby wastes are mechanically cut to reduce the materials to a relatively small size and uniform shape in order to facilitate their reprocessing and/or disposal in the landfill. Advantages include the potential to achieve higher waste-in-place densities (and therefore greater useable site capacity). Disadvantages include higher costs and longer contaminating site life (due to slower decomposition of organics in the waste mass).</p> <p><u>"Bale-Fill Method"</u>:</p> <p>A method of landfilling whereby wastes are compacted into bales before being stacked in the landfill site. Advantages include the potential to achieve higher waste-in-place densities (and therefore greater useable site capacity). Disadvantages include higher costs and longer contaminating site life (due to slower decomposition of organics in the waste mass).</p> <p><u>"Place and Compact Method"</u>:</p> <p>The most common method of landfilling whereby wastes are placed directly into the landfill, compacted and covered with interim cover soil. Advantages include lower costs to achieve the desired waste placement and shorter contaminating site life, due to a higher rate of decomposition of organics. Disadvantages include lower waste densities, thereby reducing overall site capacity.</p> |
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| 20.21 | A conceptual operational principle for the landfill should be provided. The document neglects to provide this information. | N/A | 20.21 | This matter will be addressed, as appropriate, in the Design and Operations Report. No change to the EA Report is required. |
| 20.22 | The EA document fails to mention other Ministry guidelines that will be followed in implementing the preferred alternative such as Guideline B-7, Guideline D-4-1, Ontario Drinking Water Standards, Provincial Water Quality Objectives, etc. | N/A | 20.22 | As noted in Section 13.0 of the EA Report, approval for the proposed capacity expansion will be sought under the <i>Environmental Protection Act</i> (Part V, C. of A. amendment application); and under EPA Regulation 346/90, as amended (air); and the <i>Ontario Water Resources Act</i> (sewage works). Each of these three submissions must, of course, comply with all applicable guidelines and regulatory standards. No change to the EA Report is required. |
| 20.23 | An estimate of the amount of leachate that will be generated if the preferred alternative is implemented, how the leachate will be generated if the preferred alternative is implemented, how the leachate will be handled, whether the local wastewater treatment plant will be able to handle the proposed increase in leachate quantities and confirmation in writing that the local wastewater treatment plant will accept the quantity and quality of leachate originating from the site should be provided. | N/A | 20.23 | Disposal of leachate changed in 2004 from Parry Sound to the City of Greater Sudbury Wastewater Treatment Plant. Based on trucking records approximately 10,000m ³ /year of leachate was disposed at the wastewater treatment plant. Historically, leachate disposed included leachate from the lined site and extracted groundwater. After BHA- 2 was shut down, the annual leachate generation from the lined site based on trucking records is approximately 3,500m ³ /year. With the proposed Site capacity expansion, the estimated amount of leachate generated is an average of 11,000m ³ /year including the existing lined site. |
| 20.24 | The text fails to mention the requirement for a Geotechnical assessment to be completed as required under O. Reg. 232/98. | N/A | 20.24 | This matter will be addressed in the Design and Operations Report. No change to the EA Report is required. |

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| <p>Memo from Stephanie Barnes (MOE EA C-Ordinator, Technical Support Section, Northern Region) to Catherine McLennon (August 5, 2005)</p> | <p>21</p> | <p>As the proposed expansion is within the approved waste fill area, it is unlikely that there will be any new compatibility issues with existing surrounding land uses. The EA states that the proposed waste expansion area has been previously disturbed for aggregate extraction, and was previously used for waste disposal. The OP for the Municipality of McDougall contains a policy that recognizes the existing landfill site within the Landfill Impact Area (Official Plan Section 15.02), and the municipality's zoning by-law zones the existing landfill as "Waste Disposal." Therefore, all the appropriate zoning is in place to permit the extension of the existing fill area.</p> | <p>N/A</p> | <p>21.</p> | <p>Comment noted. No response and no change to the EA Report is required.</p> |
| | <p>22</p> | <p>The Landfill Impact Area identified in the O.P. recognizes the land within 1 km of the existing landfill site may be impacted by leachate-impacted groundwater migrating from the site due to its former operation as an attenuation site. All lands within the impact area have been placed in a "holding" zone in the zoning by-law. The EA states that the "Holding" zone will remain in place until the municipality is satisfied that the groundwater quality has improved. The use of the "Holding Zone" may also serve to control future development of the surrounding lands. The municipality should consider using the "Holding" zone to place restrictions and controls on land use near the landfill. The conditions for removing the "Holding" symbol to permit a land use proposal could include a requirement for a study to address environmental issues, an assessment of adverse effects from the operation of the landfill, buffering techniques, and monitoring techniques. The municipality should consult the Ministry's Guideline D-4, "Land Use on or Near Landfills and Dumps" for further direction.</p> | <p>N/A</p> | <p>22.</p> | <p>Comment noted. See also Review Comment # 29, from MMAH. No response and no change to the EA Report is required.</p> |

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| <p>Memo from K.D. Hawley (MOE Hydrogeologist, Northern Region) to Catherine McLennon (August 3, 2005)</p> | <p>25</p> | <p>This site has and is being well studied and monitored. The hydrogeology is well understood. The existing site is now a contained cell with leachate collection and treatment. The proposed addition will only cover the remainder of the existing licensed fill footprint. The new cell will also be a lined engineered cell with leachate collection and treatment. Residual contaminants from the past natural attenuation operation is being dealt with. This will continue to be the case. Additional monitoring of the new cell will also be done via the installation of additional monitoring wells. Contingency plans are in place. The site boundaries will not need to be increased. The fill site footprint based on the original footprint will not be increased. The new cell will be located where the ground has already been disturbed with waste. It is my belief that the choice made by the consultants is not only the most obvious choice but would also appear to be the best ranked choice after going through the process.</p> | <p>N/A</p> | <p>25.</p> | <p>Comment noted. No response and no change to the EA Report is required.</p> |
| <p></p> | <p>26</p> | <p>The project is to find a site to deal with the waste for the area for the next 25 years. It is my belief that the other landfills currently servicing this area should be looked into for closure or the 25 years based on the continued operation of those sites? This needs to be clearly put forward.</p> | <p>Section 6.0. Pages 95-98 and Appendix E.</p> | <p>26.</p> | <p>Section 6.0 of the EA Report and Volume II, Appendix E, provide information on the evaluation of remaining capacity in other area landfills; the potential availability of the remaining capacity to address the waste management problem/opportunity; and the potential for expansion of capacity on those landfills. As noted, none of that remaining capacity is available to address McDougall's waste disposal problem/opportunity and the owners of those sites are not prepared to entertain potential expansions. No further response and no change to the EA Report is required.</p> |

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| Mr. Bob Bird, (Environmental Planner, Ministry of Transportation, Northeastern Region) (July 26, 2005) | 27 | MTO has no comments on this proposal. This subject property is located a sufficient distance from Highway 400 at Parry Sound so as not to be of a concern to our management of the facility. | N/A | 27. | No response and no change to the EA Report is required. |
| Mr. Hugh Bremner, (Acting Superintendent, Parks Canada: Georgian Bay Islands National Park) (July 19, 2005) | 28 | We are in receipt of the documentation concerning this project and have no comments. | N/A | 28. | No response and no change to the EA Report is required. |
| Ms. Laurie Brownlee, (Planner, Northeastern Municipal Services Office, Ministry of Municipal Affairs and Housing) (July 18, 2005) | 29 | The Northeastern Municipal Services Office did receive the EA for McDougall, your file no. EA 02-08-01, however, due to workload issues, we do not anticipate providing comprehensive comments at this time. The Township has landfill policies in effect in their Official Plan which are in accordance with MOE Guidelines "D-4 Land Use On or Near Landfills and Dumps" and a recently adopted Official Plan, but not yet approved, which retains these policies. | N/A | 29. | No response and no change to the EA Report is required. |
| Memo to Catherine McLennon (Michelle Roberge, Fish Habitat Biologist, DFO) (July 27, 2005) | 30 | The submitted report indicates that there are no surface waterbodies on the site and the landfill is surrounded by a perimeter ditch that collects surface water and conveys it to a stormwater management pond. As long as the mitigation measures suggested in the document are implemented as described, Fisheries and Oceans Canada has no comment on the proposed project. | N/A | 30. | Comment noted. No response and no change to the EA Report is required. |

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| Memo to Catherine McLennon (Richard Saunders, Corp. Aboriginal Policy and Management Branch, OSAA) (July 28, 2005) | 31 | The Ontario Secretariat for Aboriginal Affairs (OSAA) has reviewed the materials and notes that there does not appear to be any land claims in the vicinity of the project, which could impact on this project. OSAA recommends that, as per our May 17, 2005, correspondence, contact be made with the Anishinabek Nation/Union of Ontario Indians (AN/UIOI) if this has not already been done. | N/A | 31. | See First Nations and related comments, below. Full consultation with area First Nations by both MOE and the Municipality has been ongoing and will continue, as appropriate. No change to the EA Report is required. |
| 32 | 32 | OSAA recommends follow-up contact be made with the identified seven First Nations to determine if they have any further comments regarding the EA. OSAA also recommends that they be provided with a copy of the final EA. | N/A | 32. | See First Nations and related comments, below. Full consultation with area First Nations by both MOE and the Municipality has been ongoing and will continue, as appropriate. No change to the EA Report is required. |
| 33 | 33 | The Crown has a duty to consult with Aboriginal communities where its actions may adversely affect established or asserted Aboriginal treaty rights. We recommend that you consult your legal branch for advice on whether the Crown has any constitutional or other legal obligations to consult Aboriginal peoples in these circumstances. | N/A | 33. | See First Nations and related comments, below. Full consultation with area First Nations by both MOE and the Municipality has been ongoing and will continue, as appropriate. No change to the EA Report is required. |
| Ms. Rebecca Earl, (Environmental Officer Transport Canada) (July 4, 2005) | 34 | The rationale used for evaluating the preferred alternative of landfill expansion does not satisfy Transport Canada's mandate. It is our position that all waste facility projects should include the implementation of a bird management plan, which addresses aviation safety criteria, and that these facilities should commit to operating as bird-free sites. The rationale should be revised to include the following: | N/A | 34. | Bird management will be included in the wildlife management plan, which will be developed as part of the Design and Operations Report for the Site, for approval under the EPA Part V CofA amendment application. No further response and no change to the EA Report is required. |

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| 35 | Seek to avoid developments that would attract birds into proximity with airports. Specifically, Transport Canada cautions against the siting or expansion of landfills within 15km of an airport, where risks are highest. One of the compliance criteria included in Transport Canada's new Wildlife Planning and Management regulation is based on waste disposal facilities situated within 15 km of the airport geometric centre. These airports will be required to conduct a risk assessment and have in place a wildlife management plan. | N/A | 35. | See Response #34. |
| 36 | Since birds are known to travel up to 60 km between roosting and feeding sites, strict bird hazard management plans may need to be developed for waste facilities within this zone. | N/A | 36. | See Response #35. |
| 37 | Risks are greatest where an airport lies between a water body and a landfill, as this may cause bird flight paths to cross aeronautical flight paths. | N/A | 37. | See CRA's letters dated February 4, and March 15, 2005, to Transport Canada (Rebecca Earl). The model described in the comment (i.e. a landfill site located between water bodies known to be regularly utilized by flocking birds and an airport) does not apply in this case. Not only is the nearest airport (a small regional airport) some 22 km from the Site, but the entire region (i.e. Parry Sound-Muskoka) is occupied by literally hundreds of lakes, rivers, ponds and wetlands, including many in the immediate vicinity of the Parry Sound Area Municipal Airport. |

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| 38 | Comments provided by Transport Canada to the proponent on March 2, 2005 were not incorporated into the final EA. While Transport Canada maintains that all waste facility projects, with the potential to attract birds, should complete a formal risk analysis related to this hazard, we do not have an approval role with regard to waste facility proposals. Our role is limited to providing guidance to minimize impacts between aircraft and birds. | N/A | 38. | See Response # 34. This is not an EA issue. |
| Ms. Denise Fell, (Environmental Assessment Officer, EA Section, Environment Canada-Ontario Region) (June 29, 2005) | Environment Canada does not have any obligations that would trigger a Federal EA of this project under the CEEA. We would expect that the Canadian Environmental Assessment Agency has been contacted to determine whether any other federal departments have, or are likely to, trigger an EA of the project under CEEA, and if so, how coordination between federal and provincial EA processes can be achieved. | N/A | 39. | No CEAA trigger exists. |
| 40 | Our advice is in relation to our interests pursuant to the federal <i>Species at Risk Act</i> . Tab I of Volume II of the EA Report contains an April 4, 2005 letter to Douglas Robertson, Conestoga-Rovers & Associates, from David Stephenson, Natural Resource Solutions Inc. (NRSI) in response to EC's March 23, 2005 comments. This letter of response had not been previously provided to Environment Canada. | Volume II, Tab. I | 40. | Comment noted. |

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| 41 | <p>NRSI has indicated that Eastern Massassauga Rattlesnake may be found in old field, open habitats, but are not likely to be found in this area due to the early nature of the natural succession and historical impact of the gravel pit. The preferred option was not shown on a map in the EA Report with the expansion boundaries delineated in relation to vegetation communities, as recommended by NRSI in their April 4 letter (and EC in our March 23 letter). However it appears from our review that some old field communities may lie within the expansion area. Although this consultation does not appear to be documented in the EA Report, we would expect that the Ontario Ministry of Natural Resources have been or will be consulted as we had suggested regarding the potential impacts of the project on reptile species at risk since these species are the responsibility of the provincial government, and the Ontario Ministry of Natural Resources should be able to provide expertise and advice of these species.</p> | N/A | 41. | <p>It must be noted that: (a). the area proposed for the expanded landfill capacity within the existing, approved, Site boundaries was previously used for landfilling. As such the relevant part of the Site does not present potential suitable Massassauga Rattlesnake habitat; and, (b). No Massassauga Rattlesnakes were seen on or in the vicinity of the Site during conduct of the EA studies and there is no record, either formally anecdotally (e.g. landfill Site operators during the past 25 years) of rattlesnakes having been seen on or in the vicinity of the Site. The Ministry of Natural Resources, the referenced agency, expressed no concerns about Massassauga Rattlesnakes in its comments on the Draft EA Report.</p> |
| 42 | <p>The advice provided in this letter does not relieve the proponent from meeting the requirements of federal legislation such as the federal <i>Fisheries Act</i>, including subsection 36(3), the <i>Species at Risk Act</i>, the <i>Migratory Birds Regulations</i>, or any regulations made under the <i>Canadian Environmental Protection Act</i> that are applicable to the project.</p> | N/A | 42. | <p>Comment noted. All applicable Federal legislative and regulatory requirements are addressed.</p> |
| 43 | <p>We have no comments.</p> | N/A | 43. | <p>No response and no change to the EA Report is required.</p> |

Mr. Peter Jekel,
(North Bay-Parry
Sound District
Health Unit)
(June 27, 2005)

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| <p>Michael Bissonnette (Resource Planner Ministry of Natural Resources Bracebridge Area Office Parry Sound District) (Aug. 31/05 e- mail to Catherine McLennon)</p> | <p>We have reviewed the Municipality of McDougall Landfill Expansion EA (File no EA02-08-01) and the Ministry of Natural Resource (Parry Sound District) has no comments.</p> | <p>N/A</p> | <p>No response and no change to the EA Report is required.</p> |
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| Resident, Mr. William Cross 12 Rampert Cres., Toronto, ON, M6S 1E6 (June 15, 2005) | 44 | Several decades ago toxic effluence leaked through the containment liner at this site and created an ecological disaster to the Seguin River, Mountain Basin Lake, Mill Lake, and surrounding area. | N/A | 44. | CRA is not aware of any landfill-derived impacts on the Seguin River. All monitoring data show limited impacts on groundwater in the immediate vicinity of the Site. The Site had some compliance problems at its boundaries in the past, but those issues are now being addressed through the Compliance Plan and related measures. The Site is now being brought into compliance and brought up to modern engineered standards of design, construction and operation. See Response # 44. |
| | 45 | Rather than close the site and find a location that is away from major water supply, the proposal is now to expand the dump at the present location, knowing full well that any problem will again contaminate a vital water system for a heavily populated area. | N/A | 45. | |
| | 46 | There appears to be no contingency plan in place if/when a leak occurs again. The first sign of a problem will be noticed <u>after</u> the water supply has already been contaminated. | N/A | 46. | A Contingency Plan to address any unexpected impacts to groundwater and surface water will be included in the Design and Operations Plan for approval under the EPA Part V CofA amendment application. |
| | 47 | The proposal to expand is not simply for local garbage needs, but appears to be an attempt to handle garbage from other districts, much in the same way that Michigan handles Toronto's garbage. | N/A | 47. | The proposed expansion in the capacity of the McDougall Landfill Site - within existing, approved Site boundaries - is a <u>local</u> waste disposal solution, for McDougall and a small number of other nearby area municipalities. No waste will be received from other districts. Comparison with the Toronto-Michigan situation is not appropriate or relevant in this case. |

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| 48 | Local governments do not appear to be putting much emphasis in communicating the facts about the proposal. Nor do they appear interested in informing the local population about the risks involved. | N/A | 48. | <p>Consultation with the public, agencies and First Nations has been a key element of this EA from the start, including:</p> <ul style="list-style-type: none"> the preparation of Draft Terms of Reference (ToR) for the EA; the posting of the Draft ToR on the Municipality of McDougall website; the publication of newspaper Notices about the Draft ToR (including MOE's formal review of the Draft ToR and the public review period associated with that process); conduct of a Public Information Open House to provide information and seek public comment about the Draft ToR; communication by letter with area agencies First Nations and municipalities (with any such communications tabled as part of the public record of Council/Committee meetings); publication of information on MOE's web site concerning approval of the ToR; mailing of formal requests to area municipalities seeking their views about the desirability of hosting a new landfill site, expanding or sharing existing landfill capacity or participating with McDougall in its landfill capacity expansion (with any such communications tabled as part of the public record of Council/Committee meetings); preparation and release of the Draft EA Report; publication of newspaper Notice announcing the release of the Draft EA Report for review by the public, agencies and First Nations; Conduct of a Public Information Open House to provide information and seek public comment |
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| 49 | There was nothing in this EA to suggest that any ground or surface water tests have been done for the standard 4 groups of toxic chemicals (heavy metals, pesticides, PCB's, VOC's). Would this not be a sound strategy to find out how successful the present dump is at containing the leachate? | N/A | 49. | Previous groundwater quality investigations have looked for the presence of these chemicals. The contaminants of concern have been identified to be iron and manganese. Refer to the Annual Monitoring Reports and the Compliance Plan Report for the results of previous sampling. |
| 50 | According to this EA, lands within <u>one kilometre</u> of the Site will be impacted. (Vol 1, p.104, 7.7) According to this EA, there are numerous rivers, creeks, lakes and wetlands with <u>500 metres</u> of the Site. (Vol 1, p.102) The likelihood of contamination of the surrounding water systems appears significantly higher than LOW. | Volume I, p. 104, 7.7 Volume I, p. 102 | 50. | This is a mis-quote. The statement in the O.P., as stated in the EA Report, is "may be impacted" not "will be impacted". The Official Plan recognizes the presence of residual impacts off-Site. The policy of Council is to continue to remediate these residual impacts (Compliance Plan Summary Report, April 2005). Similar to many other municipalities, establishing a groundwater management zone within 1 km of the site with respect to land use and water-taking by others is a good practice. The likelihood of new contamination resulting from the continued use of the site is low, however identifying that impacts may exist is only to ensure proper investigations and precautionary measures are taken when developing these lands. |
| 51 | The Assessment also mentions that "the potential for surface water contamination increases with the number of watersheds which receive water flow from a site." (Vol 1, Table 8.1) Numerous watersheds appear to make the present site inappropriate as a landfill site, and sheds much concern on expansion. | Volume I Table 8.1 | 51. | Groundwater flow patterns on and in the vicinity of the Site are well-defined, with a comprehensive monitoring program in place for each flow path. Any contaminants in each flow path can be easily managed if unexpectedly found to be present. |

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| Resident, Mr. William Cross 12 Rampert Cres., Toronto, ON, M6S 1E6 (July 20, 2005) | 52 | This Site sits atop a deposit of silt to medium sand with gravel, and the site is 50 meters above the surrounding surface water level. The proposal is to expand to the east and vertically, increasing the height of the Site. The type of material naturally found at the Site (silt, medium sand, gravel), is such as to allow an almost free flow of water into the surrounding water shed. Any unexpected leaks will quickly enter a number of water shed systems and quickly contaminate them, as has already happened in 1989. | Volume I, p. 102, 7.3 | 52. | See Response # 51. |
| | 53 | According to the EA, Thermal Technologies is an increased risk to the environment, producing "concentrations of chemicals exceeding the limits". Apparently, there are no concerns that the same chemicals get in the ground or surface water because it is a non-hazardous solid waste site. Where would the chemicals come from that would be spewed into the air? | N/A | 53. | The EA Report clearly states that air emissions would meet the applicable air emission criteria. Chemicals would concentrate in the ash and may require the ash to be disposed of as a hazardous waste in accordance with O. Reg. 347. |
| | 54 | The transfer station at Hordy Side Road is for bagged household garbage. I have never had the attendant check to see if what I am putting in the bags is appropriate. That means that toxic chemicals could easily be placed into the McLS by irresponsible citizenry. | N/A | 54. | With any landfill site there is always the potential that irresponsible persons may attempt to send unacceptable materials to the site. Normal waste collection and site operating procedures are designed to minimize this potential by diverting such materials from the waste stream when identified. It is noted, however, that if such wastes do enter the Site, the proposed liner, leachate collection and management system, coupled with the proposed long-term monitoring programs, will identify any such contaminants leaving the waste mass. |

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| 55 | According to this EA, "The Landfill is... a local surface watershed divide, and surface water runoff would potentially drain in all directions off the Site." "...there are several small lakes, creeks, and wetlands within 500 meters of the Site... Seguin River, Agnes Lake, a wetland downstream of Agnes Lake, Cramadog lake... and (Oxley) Wetland... all waters in the area drain into this (Seguin) river... valuable fisheries exist in the Seguin River and Cramadog Lake." (Vol 1, p.102, 7.3). | Volume I, p. 102, 7.3 | 55. | See Response # 51. |
| 56 | Many of the lakes host cottages and resorts and are a major tourism attraction in the Study Area, (Vol. 1, p.22). | Volume I, p.22 | 56. | Comment noted. |
| 57 | What is being done to fulfill the advice from this EA that "valuable fisheries" and "wetlands" be considered if expansion occurs? | N/A | 57. | See Response # 51. Past and current groundwater and surface water sampling programs have shown that there have been no measurable landfill-derived impacts on water quality in surrounding water bodies that would adversely affect fisheries, fish habitat or wetlands. Proposed sampling programs will continue to monitor for future impacts and the contingency measures noted above will come into effect if and as necessary. |
| 58 | The impact ratings put forth by this EA are HIGH, MEDIUM, LOW, NIL. The rating of NIL is never used. That means that in all categories there will be a certain impact on the environment. | N/A | 58. | This is true. All human activities, including cottaging, residential activities, road usage, recreational activities, commercial and industrial activities - including landfill sites - etc., have <i>some</i> effect on the environment. So any evaluation of potential environmental effects can never truly be absolutely "NIL". The objective in this and any other EA is to identify potential environmental effects and to reduce them to acceptable levels through the application of mitigation measures. |

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| Resident, Mr. William Cross (dated August 3, 2005) (Supplement # 1 to July 20, 2005 letter) | 59 | Mr. Cross has reviewed latest data regarding cancer rates in Ontario. The source is Stats Canada. Figures compiled by the Muskoka-Nipissing and Parry Sound District Health Council and the rate is 202.7 per 100,000 people. This rate is the highest of any region in Ontario. The average rate in Ontario, from this study, is 180.5 and Toronto by comparison is 167.5. A second chart, from the same source, identifies 193.7 per 100,000. This rate is 10 th highest out of 37 regions. The average rate in Ontario from this study is 180.5 and Toronto by comparison is 167.5. Before expansion is considered for approval, it would be prudent to determine why the cancer rates in this target region are higher than the normal Ontario averages. | N/A | 59. | The commenter's implication that there is a causal relationship between the heightened cancer rate in Parry Sound District and the McDougall Landfill Site is speculative, unsubstantiated and misleading. The commenter provides no evidence from the study sources quoted that the authors found or claimed that the heightened cancer rate in Parry Sound District was related in any way to landfill sites in general or to the former operation of the McDougall Landfill Site in particular. As noted in the EA Report, in supporting technical documents and in the Annual Reports for the Site going back many years, surface water and groundwater sampling data do not indicate any discharge to the Seguin River of known carcinogenic substances. Based on this comment the design and approval of a secured, engineered landfill would be more prudent for the municipality's solid waste. The primary off-Site contaminants resulting from the historic operations are iron and manganese, which are declining with time. The proposed expansion cell will contain an engineered liner and leachate collection system for the secure long term management of the municipality's solid waste. |
| | 60 | It would also be prudent to determine why the cancer rate in the target region is higher than Toronto rates, when historically Toronto's air and water have much higher levels of toxic contamination than in more rural districts. | N/A | 60. | See Response # 59. No change to the EA Report is required. |

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| 61 | It has been argued that Parry Sound has a significant aboriginal population and this has created abnormally high readings. This however is incorrect. Except for a few examples, the cancer rate in aboriginal communities across Ontario and Canada is consistently lower than among white populations. The present figures should be a cause for concern. | N/A | 61. | See Response # 59. No change to the EA Report is required. |
| 62 | It should be determined beyond a shadow of a doubt that the present McDougall Landfill Site is in no way responsible for the higher cancer rate in the region. This would require that a reason for the higher rate be determined. | N/A | 62. | See Response # 59. No change to the EA Report is required. |
| 63 | It should be absolutely confirmed and guaranteed that any Site expansion will have no impact whatsoever on the already high cancer rate in the region. | N/A | 63. | See Response # 59. No change to the EA Report is required. |
| 64 | It should be guaranteed that no leak is possible from the Site in the future. Because of the proximity to water systems, any lake could have a catastrophic effect on the region. If none or only some of the above determinations can be met, approval of the expansion might put a considerable number of people at risk. There is also another study done by the Ontario Cancer Registry. I will be receiving a CD from this department in a few days. This should shed more light on cancer rates in the target region (see Supplement # 2 of July 2005 letter, described above). | N/A | 64. | See Response # 59. |

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| Resident, Mr. William Cross (dated August 14, 2005) (Supplement # 2 to July 20, 2005 letter) | 65. | Mr. Cross has reviewed latest data regarding cancer rates in Ontario. The Ontario Cancer Registry is the source used by Stats Canada and is the source here. The rates in the study are cancer incidence rates. Ontario has been divided into 50 regions for comparative study. | N/A | 65. | Comment noted. See Response # 59. No change to the EA Report is required. |
| | 66. | In 2002, out of 50 counties and districts in Ontario, Parry Sound had the 3 rd highest cancer rate in the province of Ontario, with an incidence rate of 652.8 (per 100,000). Toronto's rate in comparison was 397.8 in the same year. That means that residents of Parry Sound, in the year 2002, had a 64% greater chance of contracting cancer than residents of Toronto. | N/A | 66. | See Response # 59. No change to the EA Report is required. |
| | 67. | In 1979 the rate in Parry Sound was 397.1, but by the mid-nineties it had jumped to 618.7. Over the next decade it has climbed to the present level of 652.8. | N/A | 67. | See Response # 59. No change to the EA Report is required. |
| | 68. | Although it is hoped that a more detailed study would show that Parry Sound has an acceptable cancer rate when compared to other regions, in fact the opposite is true. This more detailed view of cancer in Ontario by smaller regions has shown that the cancer rate in Parry Sound is disturbingly high. | N/A | 68. | See Response # 59. No change to the EA Report is required. |
| | 69. | Re; First Nations cancer rates inflating the cancer rate figures for the Parry Sound Area, a study by Marrett L.D. and Chaudhry, M. (Division of Preventive Oncology, Cancer Care Ontario) entitled <u>Cancer incidence and mortality in Ontario First Nations, 1968-1991 (Canada)</u> is quoted here: "Cancer incidence was significantly lower in FN (First Nations) compared to the general population for all cancer (rate ratio (RR) = 0.72 for females; 0.62 for males)." | N/A | 69. | See Response # 59. No change to the EA Report is required. |

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| | 70. | The First Nations Cancer Research and Surveillance Workshop by L. Marrett of Cancer Care Ontario in 2003 showed the same results. The Ontario FN rate from 1992 to 2001 was just above 200 per 100,000 while the Ontario rate in the same period was approaching 300. | N/A | 70. | See Response # 59. No change to the EA Report is required. |
| | 71. | This should shed significant light on the subject of the proposed expansion of a landfill that is situated within 500 metres of 5 water systems upstream from the Town of Parry Sound, as stated in the Environmental Assessment. | Vol. I, p. 102 | 71. | See Response # 59. No change to the EA Report is required. |
| Source Unknown, 58 Burnside Bridges Rd., Parry Sound (July 11, 2005) | 72. | If McDougall Township were looking to build a new landfill site, would the existing one pass the criteria for a present day site? | N/A | 72. | <p>It is assumed the inquirer is referring to a hypothetical search for a new, "green field", landfill site in the area. If so, suitability of the current site would depend upon the selection criteria used for such a site selection exercise.</p> <p>It is not known whether MOE would approve a natural attenuation landfill site at this location under present-day landfill design and approvals standards. However the site could meet selection criteria for a fully-engineered (i.e. lined, with leachate collection and management system) facility - as the current site now is and as the proposed capacity expansion will be.</p> <p>It is noteworthy that the McDougall Landfill Site was one of the short-listed sites in the 1990 Parry Sound and Area Waste Management Master Plan exercise, so the site met the selection criteria used for that exercise.</p> |

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| 73. | In the time when the existing site was built, it was considered to be a good thing to be in a sandy, porous area. Taking into account all the disasters that have happened with this situation, nowadays, a sandy area such as the McDougall site isn't considered to be advisable at all. | N/A | 73. | See Response # 72. |
| 74. | If necessary, we could sample the water for heavy metals etc. above the site and below the site. | N/A | 74. | Both the current and long term water quality monitoring programs address this requirement. |
| 75. | I do not think it is in accordance with environmental standards to expand and continue to make available to other communities an already questionable site. | N/A | 75. | See above. The Site had some compliance problems in the past, but those issues are now being addressed through the Compliance Plan and related measures. The Site is now being brought into compliance and brought up to modern engineered standards of design, construction and operation. |
| 76. | I do have concerns that the expansion, which in effect doubles the capacity size of the McDougall landfill, has all of the potential to impact the quality of life at our properties (on Seguin River close to its entry into Mill Lake) because of risk to the water supply. In a larger view, I have concern regarding the location of the McDougall Landfill Site and its potential on the drinking water system of the Town of Parry Sound. | N/A | 76. | Extensive hydrogeologic\ water quality investigations have taken place to define groundwater flow paths on and in the vicinity of the Site and to search for any landfill leachate-derived contaminants in these flow paths. The contaminants identified are in the immediate vicinity of the landfill and are residual from the historic operation of the unlined landfill. The existing and proposed expansion landfill cells are/will be constructed with composite liner systems and full underdrain systems. |
| 77. | When you examine the environmental report, it places the immediate area of the landfill site under close examination and gives the impression that this is a remote, rather less populated area and that the impacts would be rather minimal. | N/A | 77. | The EA report does not suggest this is a "remote" area. It is true, however, that lands in the vicinity of the Site have a lower population density than many other areas of the municipality. |

Mr. Larry W. Douglas, B.A., LL.B., Barrister and Solicitor (August 5, 2005)

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| 78. | It is obvious with a landfill on an elevated area that gravity takes all fluids to a natural water course which will be the Oxley Swamp, Cramadog Lake, all of which have connections with the Seguin River. The Seguin River then flows into the larger water body of Mill Lake and then passes through the centre of Parry Sound. The water intake for the Town of Parry Sound comes from Georgian Bay approximately one kilometer from the mouth of the Seguin River. Any contamination issues that find their way into the Seguin River have all the potential of entering into the drinking water supply of Parry Sound. | N/A | 78. | See Response # 76. |
| 79. | I believe there should be some comment made as to the history of the McDougall Landfill Site as I have been involved as a cottage owner since the mid 1980's. I understand that there was no scientific reason for locating this private waste disposal site in its present location other than it was owned by a private waste company... The solution to remediate the site from the Ministry of the Environment was to force it upon the Township of McDougall and then have it take the responsibility for correction. | N/A | 79. | Please refer to the "Compliance Plan Report" describing how the Site was remediated and brought into compliance. |

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| 80. | <p>The chain of events was opposed by many of the Township residents who were impacted by the landfill site and the Reeve and Council at the time committed at public meetings that the only reason they would take over this landfill site was to remediate and close it. I had also expressed the view to the municipality that the Ministry had no legal authority to order them to take over the site as the problem was created by the Ministry and they were simply passing the buck to the Township to assume those obligations.</p> | N/A | 80. | <p>There is no record of the Municipality of McDougall formally promising to remediate and then close the McDougall Landfill Site. When the Ministry of the Environment required the Municipality to assume ownership and operation of the Site (which it is legally empowered to do) the Town undertook to mine the Site and consolidate the waste in a newly-constructed, lined, cell. This was successfully done and the Site has been operating with diminishing off-Site groundwater and surface water impacts ever since. No further response and no change to the EA Report is required.</p> |
| 81. | <p>There is some reference in the report that the existing capacity will end at the expiration of 2005. I do take issue with rather serious tone because I would suspect that there would be several years of life left in the McDougall Landfill Site if it was restricted solely to garbage generated by the residents of the Municipality of McDougall. I believe that the only reason that 2005 becomes a serious concern is because the municipality wishes to take in garbage from surrounding municipalities and of course generate revenues from tipping fees.</p> | N/A | 81. | <p>The existing, approved, Site capacity will expire at the end of 2005. An application for emergency capacity for a three-year period has been submitted to MOE to allow time for the completion of the approval process. The Site has always served various adjacent communities. Local commercial businesses and contractors presently utilize the Site as well. No further response and no change to the EA Report is required.</p> |

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| 82. | <p>I am now concerned that this issue really boils down to a balance of priorities of economics and the evaluation of risk to the environment. It appears obvious that the municipality wishes a 25-year life expectancy to a landfill site because it will generate great potential for revenue to offset against municipal expenses and thereby reduce taxes or at least keep it on an even line. If my assumption is correct that the Municipality has sufficient capacity for its own residents for a number of years, then the only motive for expansion would be to accommodate other municipalities and generate revenue. On the other side of the balance is the potential risk that this site would then present a health risk to those in the immediate area which I believe includes everyone downstream including the residents of the Town of Parry Sound.</p> | N/A | 82. | <p>The proposed Undertaking is not a trade-off between economic and environmental considerations. Rather, it reflects a <i>combination</i> of economic and environmental considerations so that the proposed Undertaking represents the waste disposal option having the least economic impact on area taxpayers with the fewest possible net environmental impacts. Any potential health risks are managed through the <i>EPA</i> Site Design and Operation Plan (and CofA amendment process) and the Site Compliance Plan. No change to the EA Report is required.</p> |
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| 83. | In search for an alternate landfill site, the report refers to the concept that waste disposal solutions should be dealt with locally provided that all of the host communities agree with it. That construction I think may create some fault in the environmental protection program. The report indicates that our area in the Cambrian Shield is literally dotted with lake, rivers, swamps and streams. All of these are water bodies that the Province commits to provide and preserve clean water. I raise the question that in such areas the concept of local waste landfill sites may be completely inconsistent with the policies of clean drinking water. This does leave the issue of export of landfill materials to other areas that are appropriate without endangering drinking water supplies. The report indicated that this could substantially increase by 55% the expense for waste removal, but on the other hand, any breach of the leachate that contaminates the water system as in the Walkerton issue, would many times increase the cost factor that the Province would be having to deal with. | N/A | 83. | As noted in the EA Report and supporting documents impacts on surface water and groundwater at the Site are residual from the previous, unlined, landfill operation and are diminishing steadily with time. The proposed Undertaking will be a fully-engineered, lined facility with leachate collection system and extensive monitoring program, with contingency procedures in place. Potential impacts on area lakes and rivers (already at a very low, and diminishing, level) will be further reduced to levels that comply with all applicable Provincial regulatory requirements. No change to the EA Report is required. |
| 84. | I note from the report that it tends to focus itself primarily on this site and the impact to its neighbours. It is obvious from the need to zone certain adjacent properties into a holding zone, that it demonstrates the existing technology of containment of leachate is not working with 100% effectiveness. If it was, then there would be no need to hold development on adjacent properties, which abut directly on the banks of the Seguin River. | N/A | 84. | The contaminants present are residual. The existing technology is proven to be working as intended. The control of development on lands in the vicinity of the Site is in accordance with Provincial planning policies and the McDougall Official Plan and Zoning By-law. |

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| 85. | The position of containment now seems to be ditches to control surface water and leachate wells to gather up any material that comes out of the containment cell by way of liquid. I assume in the past that this leachate migrated across the McDougall road and then contaminated the Oxley Swamp which ultimately has connection with Cramadog Lake and the Seguin River. I have personally seen red material flowing through this swamp area and into the Seguin River itself. | N/A | 85. | The groundwater extraction well is located and operated to address residual impacts from the historic operation of the unlined landfill. The Oxley wetland is an established attenuation zone for the management of residuals that previously migrated from the Site. The red material observed is iron precipitate. No further response and no change to the EA Report is required. |
| 86. | The leachate wells seem to be a solution whereby material is then placed in a tanker truck and I believe driven to the sewage treatment plant in Parry Sound. My concern at this point is that leachate is now not proceeding along the water course in the Seguin River, but is being transported directly into Parry Sound. | N/A | 86. | Previously, leachate from the lined landfill was transported to the Parry Sound Wastewater Treatment Plant for treatment. Presently, it is being transported to Sudbury. Both facilities are licenced by MOE to receive leachate such as that from the McDougall Landfill Site. No further response and no change to the EA Report is required. |
| 87. | I am not a chemist, but I would imagine that leachate is a solution of chemicals. I believe that the Town of Parry Sound has a treatment facility to treat organic material. I have a concern as to whether leachate dumped into that treatment plant receives anything that can effectively deal with it. It is probable that simply chlorine is added to the chemical cocktail and it is ultimately discharged into Georgian Bay. | N/A | 87. | The Parry Sound Wastewater Treatment Plant is permitted under the <i>Ontario Water Resources Act</i> to receive and treat landfill leachate such as that from the Site. The facility accepts liquid waste from the community and surrounding area, in accordance with its Certificate of Approval. |

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| 88. | <p>The outflow of the Parry Sound sewage treatment plant is approximately one kilometre away from the mouth of the Seguin River but in the opposite direction to the water treatment plant. The entire bay where the Seguin River enters into Georgian Bay is somewhat contained by islands and the possibilities exist for those waters to be drawn into the water treatment plant. I have been advised that water testing has been done through the Seguin River and in Mill Lake and the results seem to be satisfactory. In view of the fact that leachate is being transported into the treatment plant in Parry Sound, I am wondering if anyone has conducted any water studies as to any changes in effect since that policy has been commenced as to water quality where the treated leachate is returned to Georgian Bay.</p> | N/A | 88. | <p>Presently leachate is being transported to the City of Sudbury WWTP. From 1994 to 2004, it was transported to at the Parry Sound WWTP. Both treatment plants are licenced under the <i>Ontario Water Resources Act</i> and both have effluent sampling requirements.</p> |
| 89. | <p>I now question why any landfill site would be given consideration when it essentially sits on the banks of a waterway servicing the major community in the Parry Sound area. It would seem to me that the McDougall Landfill Site keeps being chosen as the ideal solution, but I am suggesting that it is simply the path of least resistance to be able to provide a local landfill site. It is probably far easier to argue that this site can continue although it has a faulty origin as opposed to trying to develop a new site.</p> | N/A | 89. | <p>See Response # 83, above. No further response and no change to the EA Report is required.</p> |

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| 90. | I would submit that the proper course of action to deal with landfill materials in this area would be for the municipality to restrict the McDougall Landfill Site to its residents and thereby carry it on for additional years of containment. This would follow the original commitment of the Township in 1989 to remediate the site and have it closed. For other municipalities that do not wish to have landfills in their particular areas, they should consider the issue of export, bearing in mind the close proximity of all waterways. In the long run, the Municipality of McDougall will have to consider the same issues. | N/A | 90. | The other area municipalities have expressed interest in using the Municipality of McDougall Landfill Site. Some in fact already do access the Site and have done so for many years. These other area municipalities are not "foreign" to the area; they are McDougall's local neighbours and represent a responsible local waste management solution for their residents as well as for the residents of McDougall Township. In regard to the question of closure of the existing Site, there is no record of any formal commitment having been made by the Municipality of McDougall to close the Site when it reaches its approved capacity. No change to the EA Report is required. |
| 91. | "The chief concern I have in this expansion proposal for the landfill site is what will it do to the quality of our water supplies". | | 91. | This issue has been addressed under several of the above responses. The proposed expansion will include a liner with leachate collection and control system, and a comprehensive long-term monitoring program. Any groundwater or surface water originating at the Site and discharging to the Seguin River must meet all regulatory requirements. Contingency measures will be put in place. |
| 92. | We have no comments and do not require further involvement in this proposal. | N/A | 92. | No response and no change to the EA Report is required. |
| 93. | We have no comments. | N/A | 93. | No response and no change to the EA Report is required. |

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| Chief Howard A. Pamajewon, Shawanaga First Nation August 10, 2005) | 94. | Upon receipt of the EA document on June 20 th , 2005, Chief Pamajewon requested an intervention by Mr. Ray Alato (Environmental Health Officer, Health Canada) because of his professional expertise with aboriginal communities and of the "Federal & First Nation" relationship with Health Canada. | N/A | 94. | Comment noted. No response and no change to the EA Report is required. |
| | 95. | Initially the Shawanaga First Nation had some concerns about the development or use of their traditional lands or hunting territory, such as wildlife impacts, water issues, traditional medicine plants and other vegetation within the vicinity of the proposed waste disposal site. | N/A | 95. | Comment noted. No response and no change to the EA Report is required. |
| | 96. | The Shawanaga First Nation intends to contact Natural Resources Solutions Incorporated with respect to plant and vegetation listed in the report, which might clarify the Shawanaga First Nation concerns of flowers, plants, roots and other vegetation for traditional purposes. | N/A | 96. | Comment noted. Other than to confirm results with NRSI, no response and no change to the EA Report is required. Comments from NRSI to be forwarded if Shawanaga FN contacts NRSI. |
| Chief Howard A. Pamajewon, Shawanaga First Nation August 10, 2005) (cont'd) | 97. | We are aware that comments received after August 5, 2005, may not be considered in the approval process, nevertheless, we strongly consider it very important in light of bridging those gaps between area Municipal governments and area First Nations leadership. | N/A | 97. | Comment noted for forwarding to the Municipality of McDougall and the other municipalities referenced in the EA Report. No response and no change to the EA Report required. |
| Ray Alatalo, Environmental Health Officer, Health Canada. Letter to Chief Howard Pamajewon, Shawanaga First Nation (August 5, 2005) | 98. | With respect to the scope of the project, this application is for the expansion of the existing landfill operation <i>within</i> the existing boundaries of the landfill site. As such the significance of the undertaking is limited to the area already previously affected by aggregate activities in the same area. The anticipated 678,738 cubic metres of waste volume represents a 25-year uninterrupted supply of non-hazardous solid waste disposal for the municipality and its partner municipalities. | N/A | 98. | Comment noted. This information is correct. No response and no change to the EA Report is required. |

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| 99. | <p>The site has undergone significant engineering assessment for surface and groundwater impact assessment and mitigative measures are being actively monitored by the Ministry of the Environment with respect for protection of these water resources. Other natural resources such as wildlife and significant vegetation has been outlined in the report, and the significant biological resources are outlined within the Primary Study Area by Natural Resource Solutions Inc. Significant vegetation listed in the report (page 23) include:</p> <ul style="list-style-type: none"> • Leatherleaf - Chain fern/St. John's-wort Shrub Fen • Dry - Fresh Hemlock - Oak Mixed Forest • Common Juniper Acidic Shrub Rock Barren Type • Acid treed Talus Ecosite | N/A | 99. | Comment noted. This information is correct. No response and no change to the EA Report is required. |
| 100 | <p>Alatalo advised that he is not familiar with the value of these species with respect to traditional medicine, their significance is raised for your review. He suggests contacting NRSI for a more detailed listing of Biological resources of the study area.</p> | N/A | 100. | <p>Comment noted. Other than to confirm results with NRSI, no response and no change to the EA Report is required.</p> <p>Comments from NRSI to be forwarded if Shawanaga FN contacts NRSI.</p> |
| 101 | <p>Overall the report is complete in that it clarifies the validity of this proposal in lieu of other alternatives. There are significant limitations to provincial landfill operations, and as was discussed in this report, there are no other economical solutions to the landfill needs of McDougall Township and the partner municipalities.</p> | N/A | 101. | Comment noted. No response and no change to the EA Report is required. |

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| | 102 | Since your community makes use of the North Area Landfill # 9, this undertaking does not specifically affect the non-hazardous landfill needs of your community. Nonetheless an awareness of the project is fruitful to the protection of our natural resources and I have no recommendations to offer with respect to this undertaking. | N/A | 102. | Comment noted. No response and no change to the EA Report is required. |
| Chief Elizabeth (Betty) Sandy, Moose Deer Point First Nation (Aug. 31/05 e-mail to Catherine McLennon). | 103 | Please be advised that Moose Deer Point First Nation has no comments with respect to the McDougal Landfill Expansion EA. | N/A | 103. | No response and no change to the EA Report is required. |
| Dokis First Nation | | No comments. | N/A | 104. | No response and no change to the EA Report is required. |
| Wasauksing First Nation | | Comments outstanding | | | |
| Henvey Inlet First Nation | | Comments outstanding | | | |
| Anishanabek Nation, Nippising First Nation | | Comments outstanding | | | |

