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**JOINT MUNICIPAL COORDINATING COMMITTEE**

**PEER REVIEW REPORT**

**Review Of**

**WALKER ENVIRONMENTAL GROUP**

**SOUTHWESTERN LANDFILL**

**ENVIRONMENTAL ASSESSMENT**

**ALTERNATIVE METHODS INTERIM REPORT**

**(Dated January 3, 2017)**

**March 10, 2017**

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March 10, 2017

Mayor Margaret Lupton, Chair  
Joint Municipal Co-ordinating Committee  
Township of Zorra  
274620 27th Line, RR#3  
Ingersoll, Ontario  
N5C 3J6

**Re: Peer Review of Walker Environmental Group Report: *Alternative Methods Interim Report***

Dear Mayor Lupton:

I am pleased to submit herewith the report of your Peer Review Team (PRT) on Walker Environmental Group's (WEG) *Alternative Methods Interim Report* dated January 3, 2017. This was prepared by WEG pursuant to the Terms of Reference (ToR) governing the Environmental Assessment of the Southwestern Landfill Project (the EA) as approved and amended on 17 March 2016 by the Ontario Minister of Environment and Climate Change (MOECC).

Our report is comprised of memoranda from Morrison Hershfield, the EA Planner on the PRT, and CH2M Hill, the Landfill Engineering specialists on the PRT, supported by a table of detailed comments addressing the *Alternative Methods Interim Report* section by section. The PRT had requested that other key disciplines review the report, but WEG denied funding for their review.

To summarize, WEG has generally followed the process required of them by the ToR. However, the conclusions reached are flawed by a number of weaknesses in the analysis. Of particular note:

1. WEG has not done sufficient due diligence to eliminate the greenfield alternative footprint (Alternative 1) as a reasonable option for more detailed evaluation. The precise location and value of the aggregate resource potentially foregone at this site should have been presented and evaluated against any potential advantages, hydrogeological or otherwise, that this site may offer. A land use planning analysis should have been presented documenting that the relevant policies of the PPS relied upon to exclude this option were correctly interpreted and applied. Also, Alternative 1 should have been carried forward to the next stage where a more complete investigation and assessment would be conducted to ascertain whether this site could provide better natural attenuation to protect the underlying aquifers. We understand the Citizen Liaison Committee has also strongly encouraged WEG to carry forward Alternative 1 to the next stage for comprehensive assessment.

The PRT is of the view that, when there are competing policy considerations in an environmental assessment for a project such as this, the advantages and disadvantages of

alternative courses of action should be fully investigated and evaluated. In this case, more detail is required to understand the implications on groundwater, that serves as a municipal water supply, in comparison to the protection of an aggregate resource for future extraction. This has not been done.

2. The report does not sufficiently document the genesis of the “lakes”, labeled 2a and 4a in Figure 2 of the report, to confirm that they qualify as “lakes” under Section 27. 3.2 (d) of the Environmental Protection Act and thereby disqualify these areas as potential landfill sites.
3. Hydrogeological and seismic considerations are not included in the screening and evaluation criteria for the landfill design.
4. WEG has not fulfilled the spirit of Amendment #8 in the Minister’s Notice of Approval requiring WEG to consult with MOECC and key stakeholders on the comparative evaluation methods for the selection of the preferred alternative, as well as the detailed technical studies to be used before the preferred alternative method has been selected. A review of this report by a limited number of review specialists is inconsistent with consultation required by best practices in Ontario and the *Codes of Practice for Preparing and Reviewing Environmental Assessments in Ontario* (January 2014). Our review has identified a number of areas where review by specialists in hydrogeology, seismic engineering, land-use planning, and public consultation is required to test the conclusions reached by WEG. WEG has denied the JMCC the opportunity for such reviews.
5. The report has not addressed alternatives for separation at source, at the landfill or otherwise of ICI waste (recyclables, organics etc.), as required by Amendment #9 of the Minister’s approval.

Other deficiencies are identified in the attached table of comments.

Overall, the screening and comparative evaluation of alternatives provided in the *Alternative Methods Interim Report* is lacking in the rigour needed to impart confidence to the conclusions. This results from a failure to incorporate the required analysis by a number of important disciplines. As noted, the funded peer review in these disciplines was similarly constrained.

Yours truly,



Chris Haussmann  
Manager, Peer Review Team

Copy: D. Mayberry, T. Comiskey, P. Crockett, M.E. Greb, D. MacLeod, W. Tigert,  
P. Pickfield, L. Teeple, T. Conte, Peer Review Team

# MEMORANDUM



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TO:	Chris Haussman	ACTION BY:	
FROM:	Mike Bricks, MCIP, RPP	FOR INFO OF:	
PLEASE RESPOND BY:		PROJECT No.:	1170089
RE:	Alternative Methods Peer Review - Southwestern Landfill Proposal EA	DATE:	March 2, 2017

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The purpose of this memo is to summarize the results of the peer review completed on the Alternative Methods Interim Report dated January 3, 2017 prepared by Walker Environmental for the Southwestern Landfill Proposal Environmental Assessment.

The focus of this review was to confirm that the evaluation of alternative methods was conducted in a manner consistent with the requirements of the EA Terms of Reference (ToR) as approved by the Minister of the Environment and Climate Change on March 17, 2016 as well as consistent with the principles of good EA planning outlined in the *Codes of Practice for Preparing and Reviewing Environmental Assessments in Ontario* (January 2014).

This review focused only on EA process and planning principles, not on the technical validity of the impact assessment per se. In general, we note that this review would have benefitted from a more comprehensive review by other appropriate specialists, notably in the fields of hydrogeology, land use planning and social impact assessment, to confirm that the conclusions of the feasibility screenings and comparative evaluations are correct and accurate.

The basic requirements for generating and evaluating alternative methods is outlined in Section 8.1 of the EA ToR. This section outlines a seven step process for generating and evaluating alternatives.

The first step of the process focuses on generating a reasonable range of alternatives. The review by CH2M Hill addresses the question of whether or not a reasonable range of alternatives was indeed identified and evaluated.

The second step is a screening process to determine if the alternative should be carried forward for detailed analysis. The criteria used for this step were outlined in the EA ToR and applied for the six components of the project. As noted previously, this step in the process would have benefitted from a review by the appropriate specialists to confirm that the conclusions reached are indeed correct and accurate. Our concerns about these conclusions and a number of suggestions for documentation improvement are outlined in the attached table.

Steps 3-7 outline the process for the more detailed impact assessment and evaluation. The evaluation considered the net effects to the environment of the various alternatives based on the criteria presented in Appendix B of the EA ToR. Only two components of the project were subject to this evaluation (Landfill Design Alternatives and Haul Routes). In general, these steps were undertaken in a manner consistent with the requirements of the EA ToR. Again, this step in the process would have benefitted from a review by the appropriate specialists to confirm that the conclusions are correct and accurate. Some suggestions for documentation improvement are provided in the attached table.

In addition to reviewing the consistency with the EA ToR, this review considered consistency with the principles of good environmental assessment planning as outlined in Section 3.1 of the *Codes of Practice for Preparing and Reviewing Environmental Assessments in Ontario* (January 2014).

The following is a brief summary:

1. Consult with Potentially Affected and Other Interested Persons
  - Although consultation is briefly described and stakeholder input is summarized for each project component, the Report does not provide enough detail to conclude that the full range of stakeholders were adequately engaged nor does it provide sufficient back-up to ensure that the issues listed are the only relevant issues.
2. Consider a Reasonable Range of Alternatives
  - The CH2M review addresses landfill footprint, design and engineering alternatives. A reasonable range of haul route alternatives was considered.
3. Consider All Aspects of the Environment
  - Given that the criteria were proposed in the EA ToR and approved by the Minister, this review has assumed that the Minister is satisfied that the process was designed to consider all aspects of the environment.
4. Systematically Evaluate Net Environmental Effects
  - Given that the process was proposed in the EA ToR and approved by the Minister, this review has assumed that the Minister is satisfied that the process was designed to systematically evaluate net environmental effects. In general, the process was applied systematically however, given that the focus of this review was not to verify the technical validity of the impact assessment we cannot confirm that the conclusions of the feasibility screenings and comparative evaluations are correct and accurate.
5. Provide Clear and Complete Documentation
  - In general the report and evaluation tables are clear and easy to understand. The rationale for the decision making process is clearly stated, however some suggested improvements are provided in the attached table.

Upon reviewing the Minister's Notice of Approval, we note the following:

1. Amendment #8 requires the proponent to consult with MOECC and other stakeholders on the comparative evaluation methods for the selection of the preferred alternative, as well as the detailed technical studies to be used before the preferred alternative method has been selected. Presumably Walker considers this review to be its consultation with the Joint Municipal Coordinating Committee through the Peer Review Team. However, the scope of this review has been significantly limited by Walker and in our view, does not constitute sufficient consultation to be consistent with Ontario's *Codes of Practice for Preparing and Reviewing Environmental Assessments in Ontario* (January 2014) insofar as a review by important, relevant discipline specialists has been denied.



2. "Source separation" was not considered as an alternative method, as required by Amendment #9. - This amendment requires the proponent to consider and evaluate alternative methods for the separation, at source, at the landfill or by other method, of Industrial, Commercial and Institutional waste.



# Review of Alternative Methods – Southwestern Landfill Proposal EA

PREPARED FOR: Joint Municipal Coordinating Committee  
C/O Chris Haussmann, M.A., R.P.P. – Peer Review Manager

PREPARED BY: Dave Lake, CH2M

DATE: March 2, 2017

PROJECT NUMBER: 469175.01.06

As a member of the Peer Review Team (PRT) appointed by the Joint Municipal Peer Review Coordinating Committee, CH2M HILL Canada Limited (CH2M) has conducted a review of the Alternative Methods – Interim Report dated January 3, 2017 prepared by Walker Environmental Group (WEG) for the Southwestern Landfill Proposal Environmental Assessment (EA). WEG is a subsidiary of Walker Industries Holdings Limited.

Detailed findings of CH2M’s review are presented in the Table attached. The Scope of Review and our summary Conclusions are reported below.

## Scope of Review

CH2M completed its peer review of the Alternative Methods – Interim Report to the extent relevant to our designated disciplines, being landfill engineering design including management of leachate, surface water, and landfill gas. CH2M’s peer review team consisted of the subject matter experts listed alphabetically below along with their designated area of expertise for this assignment:

- Wayne Cooley, B.A.Sc., P.Eng. – Landfill Engineering/Conceptual Facility Design, including Surface Water Assessment
- Dave Lake, B.A.Sc., P.Eng. – Landfill Engineering/Conceptual Facility Design
- Chuck Smith, B.A.Sc., C.A.S., B.Eng., P.Eng. – Landfill Gas Collection/Utilization Assessment

## Findings

Overall the Alternative Methods – Interim Report is generally well written and organized. The Report conforms to the approved Amended Terms of Reference.

Generally speaking, the Report presented and evaluated a sufficient number of alternatives, with a few specific exceptions noted in the attached Table. However, the evaluation of alternatives was rudimentary and the Report would benefit from detailed input from a broader, multi-disciplinary team. For example, discussion of hydrogeological and seismic impacts of the various landfill design alternatives was not considered, even though there is sufficient information on record for these disciplines to make meaningful evaluation of alternatives at this stage of the EA process. The team would impart their expertise into the screening of each potential alternative in order to more adequately determine/select the potentially feasible alternative(s) for further detailed assessment in the EA.

In Section 5.1.2 of the Report, the generic single composite liner and generic double composite liner systems were reviewed and evaluated, however a site-specific liner design(s) was not discussed. In

Table 1: Alternative Methods to be Evaluated in the EA, in the Landfill Design Alternatives row it was noted that generic or site-specific compatible liner designs would be considered. A site-specific liner design(s) should be developed for the site and included as part of the evaluation, or, rationale should be provided indicating why site-specific liner designs were not included in the evaluation.

Specific peer review comments pertaining to landfill engineering design have been listed and referenced to particular sections of the Report in the attached Table, along with any general comments arising during CH2M’s review.

## Conclusions

The Alternative Methods – Interim Report is informative, but incomplete in a few sections insofar as it lacks comprehensive consideration of a number of alternatives as noted in the attached Table.

We trust this report (i.e., Technical Memorandum) and the attached Table of CH2M’s PRT comment disposition is satisfactory.

Sincerely,

CH2M HILL Canada Limited

Prepared by:



Dave Lake, B.A.Sc., P.Eng.  
Civil Engineer/Landfill Specialist



Chuck Smith, B.A.Sc., C.A.S., B.Eng., P.Eng. (Alberta and BC)  
Senior Civil Engineer/Landfill Gas Specialist

Reviewed by:



Wayne Cooley, B.A.Sc., P.Eng.  
Senior Environmental Engineer/Landfill Specialist

Enclosure: PRT Comment Disposition Table: Landfill Engineering Design including Leachate, Surface Water and Landfill Gas



<b>Walker Southwest Landfill Environmental Assessment Peer Review</b>				
<b>Alternative Methods Interim Report</b>		<b>DISCIPLINE: EA Planning and Landfill Engineering Design</b>		
<b>Section /Page</b>	<b>Para/ Line</b>	<b>PRT Comment</b>	<b>WEG Response</b>	<b>Final Disposition</b>
General Comment		This review was limited by the proponent to the two disciplines identified in the heading above. However, it is clear from our review that, in order to confirm that the conclusions of the feasibility screenings and comparative evaluations are correct and accurate, expertise in the following disciplines is required for a comprehensive review of the Alternative Methods Interim Report: Land Use Planning, Social Impact Assessment, Hydrogeology and Seismology.		
Sections 1-3 (Introduction, Range of Alternatives and Evaluation Methodology)		These sections generally conform to the requirements of the ToR.		
Section 2/Page 3	Table 1. Landfill Gas Mgmt Alternatives	Renewable natural gas (RNG) should be included in the sentence after industrial fuel as an option, since it is described in Section 7 as a potential option.		
Section 4.1 (Identification of Landfill Footprint Options)	Entire Section	Morrison Hershfield and CH2M Hill have reviewed this section and are of the opinion that a reasonable range of alternatives was initially identified.		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
Section 4.2  (Feasibility Screening)	Par 4, 5, 6	Although the rationale for why Alternative 1 is not consistent with the PPS may be reasonable, it is not sufficiently supported by the information provided. Additional data and analysis should be presented to demonstrate that the entire Greenfield area contains economically viable aggregate resources and that there is no potential for location of a landfill within this large area. . Also, a peer review of this section by a land use planner with knowledge of aggregate resources planning should be undertaken to confirm compliance with the County of Oxford Official Plan and the Provincial Policy Statement.		
Section 4.2.2 and 4.2.3 / Page 12  (Feasibility Screening)	Para 1	Under Section 27. 3.2 (d) of the Environmental Protection Act (EPA), <b>if the area of land identified as a “lake” was less than one hectare in area on the day that this subsection came into effect (which was June 17, 2004) then the area is not subject to this landfilling exclusion.</b> This report should document with historic records that the “lake” areas labeled as 2a and 4a in Figure 2 meet the criteria set out in the Section 27.3.1 landfilling exclusion. Otherwise, these areas should be included as part of the Landfill Footprint Alternative 2: East Quarry area and Alternative 4: Former Southwest Quarry & Stone Plant area respectively.		

<b>Walker Southwest Landfill Environmental Assessment Peer Review</b>				
<b>Alternative Methods Interim Report</b>		<b>DISCIPLINE: EA Planning and Landfill Engineering Design</b>		
<b>Section /Page</b>	<b>Para/ Line</b>	<b>PRT Comment</b>	<b>WEG Response</b>	<b>Final Disposition</b>
Section 4.3  (Preferred Landfill Footprint Alternative)	Entire Section	To improve clarity, this section should provide a clear statement that the comparative evaluation Steps 3-7 of the Alternative Methods evaluation process were not required because only one alternative passed Step 2. Assuming Steps 3-7 are not required for this component of the project , it should be noted here that a detailed impact assessment of the preferred alternative and comparison with the do-nothing alternative will occur at a subsequent stage in the EA process.		
Section 4.4  (Input from Public Consultation)	Entire Section	As per the MOECC Codes of Practice, consultation is a key principle of good EA Planning. This section does not provide enough detail to conclude that the full range of stakeholders were adequately engaged. There is also not enough back-up provided to ensure that the five issues listed are the only relevant issues. Improvements should be made to provide more clear and complete documentation. A review by the PRT public consultation reviewer would have determined whether consultation efforts were sufficient and all relevant issues raised in the consultation process have been addressed here.		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
Section 5.1.1/Page 16	Fill and Rock Wall/Line 5	Typo: "...for Walker to remove as it support the rehabilitated lands..." should read 'as it supports' or possibly 'as it is supporting'.		
Section 5.1.2/ Page 16-18  (Landfill Design Alternatives – Regulatory and Design Requirements)	Liner System subsection	The generic single composite liner and generic double composite liner systems were reviewed and evaluated, however site-specific liner designs were not discussed. Table 1, Landfill Design Alternatives noted that generic or site-specific compatible liner designs would be considered. A site-specific liner design(s) (as contemplated by O.Reg. 232/98 in addition to generic single composite liner and generic double liner systems) should be developed for the site and included as part of the evaluation, or a rationale should be provided indicating why site-specific liner designs were not included in the evaluation.		
Section 5.1.2/Page 19-20	Landfill Orientation subsection	Only two orientations were evaluated for the landfill footprint. Additional landfill footprint configurations should be developed and included in the evaluation, such as a combined north-south and west-east orientation. Evaluation of the landfill footprint should also incorporate/discuss consideration of the location of landfill facilities, buildings and other supporting features.		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
Section 5.1.6/Page 22	Line 1	The first line discusses the possibility of a truly 'entombed' landfill, which is different than the option discussed in the rest of the section, a deep design with the landfill cap exposed to the surface. For clarity, this paragraph should only discuss the option presented, being a 'deep' design. Alternatively, a fourth design alternative could be presented to evaluate a truly 'entombed' landfill design.		
Section 5.1.6/Page 22	Line 1, footnote 9	Footnote 9 references O.Reg. 232/98; s.10. (5) 3.iii. which relates to the hydraulic conductivity of the base liner system, not the infiltration rate of the final cover system. The correct reference would be O.Reg. 232/98; s.10. (5) 2.		
Section 5.2/ Page 23	Line 1	First sentence refers to Table 3, but should be referring to Table 4.		
Sections 5.2 /5.3 Feasibility Screening and Comparative Evaluation	Entire sections	The feasibility screening and evaluation should include other technical considerations, including hydrogeology and seismic considerations, as criteria for the three alternative landfill design concepts.		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
Section 5.3 / 5.4  (Preferred Landfill Design Alternative.)	Entire sections	Only a rudimentary evaluation of the two potentially feasible alternatives presented in Table 4 has been completed as part of the report. A more detailed, technical evaluation and assessment of alternatives should be completed prior to arriving at the preferred solution. The evaluation and assessment should also include input from a multi-disciplinary team of experts, including hydrogeologists and seismic engineers, who would impart their expertise to the impact assessment process in order to more adequately determine/select the potentially feasible alternative(s) for further detailed assessment in the EA.		
Section 5.5  (Input from Public Consultation)	Entire Section	As per the MOECC Codes of Practice, consultation is a key principle of good EA Planning. This section does not provide enough detail to conclude that the full range of stakeholders were adequately engaged. There is also not enough back-up provided to ensure that the six issues listed are the only relevant issues. Improvements should be made to provide more clear and complete documentation. A more detailed review by the PRT public consultation reviewer would have determined whether consultation efforts were sufficient and all relevant issues raised in the consultation process have been addressed here, but WEG denied the PRT's request for funds to conduct such a review.		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
Section 6.1/Page 28 (Leachate Treatment Alternatives )	Para 2	An additional alternative which should be identified and considered, for completeness, is Initial/Partial On-Site Treatment and Piping/Haul to Municipal Wastewater Treatment Plant.		
Section 6.1.1/Page 29	Para 2	For completeness, the report should provide a range of leachate production estimates in place of simply an estimated average production.		
Section 6.3  (Preferred Leachate Treatment Alternative)	Entire Section	To improve clarity, this section should include a clear statement that the comparative evaluation Steps 3-7 of the Alternative Methods evaluation process were not required because only one alternative passed Step 2. Assuming Steps 3-7 are not required for this component of the project, it should be noted that a detailed impact assessment of the preferred alternative together with the “do-nothing alternative” will occur at a later stage in the process.		
Section 6.4  (Input from Public Consultation)	Entire Section	As per the MOECC Codes of Practice, consultation is a key principle of good EA Planning. This section does not provide enough detail to conclude that the full range of stakeholders were adequately engaged. There is also not enough back-up provided to ensure that the five issues listed are the only relevant issues. Improvements		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
		should be made to provide more clear and complete documentation. A more detailed review by the PRT public consultation reviewer would have determined whether consultation efforts were sufficient and all relevant issues raised in the consultation process have been addressed here. The PRT was denied funding to conduct such a review.		
7.1.1 General Regulatory & Design Considerations / Page 34  (Landfill Gas Management Alternatives)	Entire section	Section does not list or describe regulatory requirements/ considerations for LFG management (Provincial or Federal). Only provides a background on how LFG is formed and estimated peak LFG generation for a similar site. Relevant regulatory requirements/ considerations for LFG should be reported in this Section.  Specifically, this section should reference O.Reg. 232/98 which requires new sites with capacity of over 1.5 million cubic metres of solid waste to incorporate collection of LFG and associated air emission controls. This would set up the regulatory basis for the following sections discussion of LFG alternatives.		
7.1.2 Passive Venting Alternative /	Entire section	It should be noted that passive venting results in LFG emissions directly released to the atmosphere which are a source of greenhouse gas emissions! This section should discuss how methane oxidation could be used to reduce methane emissions from passive venting and		



Walker Southwest Landfill Environmental Assessment Peer Review				
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Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
Page 34		whether/when this technique would be applied.		
7.1.4 Utilization Alternative / Page 36	Subheading: Industrial Fuel (Direct Use) Para 1/Line 5	Should indicate typical distance or maximum distance from landfill to potential end-user for direct use applications (e.g. within 10 km) to be viable.		
7.1.4 Utilization Alternative / Page 36	Subheading: Industrial Fuel (Direct Use)	Should indicate that in addition to distance from the site, the fuel demand of the end-user is a key factor in the economic viability of direct-use applications.		
7.1.4 Utilization Alternative / Page 36	Subheading: Electrical Power Generation / Para 1/Line 2	Should also indicate for completeness that the LFG has to be pretreated to a greater extent due to trace contaminants (such as siloxanes) that can drastically increase reciprocating engine O&M costs and operational life.		
7.1.4 Utilization Alternative / Page 36	Subheading: Electrical Power Generation / Para 2/Line 2	Add “annually” or “per year” to the value 120,000 MWh of electricity.		
7.1.4 Utilization Alternative / Page 37	Renewable Natural Gas / Para 1/Line 2	It should be noted here that CNG could be used for fleet vehicles including waste and recyclables hauling trucks. Liquefied natural gas (LNG) is also an option with further processing.		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
7.1.4 Utilization Alternative / Page 37	Renewable Natural Gas / Para 2/Line 1	There are other RNG projects from LFG that are in the works in BC (FortisBC's Salmon Arm Landfill and Glenmore Landfill, Kelowna Biomethane projects). Consider noting these in addition to the two Quebec precedents.		
Section 7.3  (Preferred Landfill Gas Management Alternative)	Entire Section	To improve clarity, this section should provide a clear statement that the comparative evaluation Steps 3-7 of the Alternative Methods evaluation process were not required because only one alternative passed Step 2. Assuming Steps 3-7 are not required for this component of the project , it should be noted here that a detailed impact assessment of the preferred alternative and comparison with the do-nothing alternative will occur at a subsequent stage of the EA process.		
Section 7.4  (Input from Public Consultation)	Entire Section	As per the MOECC Codes of Practice, consultation is a key principle of good EA Planning. This section does not provide enough detail to conclude that the full range of stakeholders were adequately engaged. There is also not enough back-up provided to ensure that the two issues listed are the only relevant issues. Improvements should be made to provide more clear and complete documentation. A more detailed review by the PRT public consultation reviewer would have determined whether consultation efforts were sufficient and all relevant issues raised in the consultation process have been		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
		addressed here. The PRT was denied funding to conduct such a review.		
Section 8.1.1 (Haul Route/Site Entrance)	Par 1	IC&I should be defined. The non-technical reviewer may not be familiar with this term.		
Section 8.1.1	Entire Section	Rationale should better explain the 'generation criteria' used (i.e. minimize length on local roads, minimize routing through built-up areas etc).		
Section 8.2.2	Line 1	Typo 'sexisting'		
Section 8.3 "Preferred Alternative Haul Route/Site Entrance"	Entire Section	This section and the corresponding tables (C-1 and C-2) follow the process outlined in the EA ToR. The evaluation was relatively clear as the preferred alternative was preferred in every criteria/indicator and no 'trade-offs' were required.		
Section 8.5  (Input from Public Consultation)	Entire Section	As per the MOECC Codes of Practice, consultation is a key principle of good EA Planning. This section does not provide enough detail to conclude that the full range of stakeholders were adequately engaged. There is also not enough back-up provided to ensure that the five issues listed are the only relevant issues. Improvements		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
		should be made to provide more clear and complete documentation. A more detailed review by the PRT public consultation reviewer would have determined whether consultation efforts were sufficient and all relevant issues raised in the consultation process have been addressed. The PRT was denied funding to conduct such a review.		
Section 9.1	Table 12	Table 12 may need revision to incorporate changes due to prior comments.		
Minister's Notice of Approval		<p>1. Amendment #8 requires the proponent to consult with MOECC and other stakeholders on the comparative evaluation methods for the selection of the preferred alternative, as well as the detailed technical studies to be used <u>before</u> the preferred alternative method has been selected. Presumably Walker considers this review to be its consultation with the Joint Municipal Coordinating Committee through the Peer Review Team. However, the scope of this review has been significantly limited by Walker and in our view, does not constitute sufficient consultation to be consistent with Ontario's <i>Codes of Practice for Preparing and Reviewing Environmental Assessments in Ontario</i> (January 2014) insofar as a review by important, relevant discipline specialists has been denied.</p> <p>This amendment also commits the proponent to evaluating the 'do</p>		

Walker Southwest Landfill Environmental Assessment Peer Review				
Alternative Methods Interim Report		DISCIPLINE: EA Planning and Landfill Engineering Design		
Section /Page	Para/ Line	PRT Comment	WEG Response	Final Disposition
		<p>nothing' alternative, which is not discussed in this document. Information should be provided to explain how this requirement will be addressed in subsequent stages of the EA Process.</p> <p>2. Amendment 9 requires the proponent to consider and evaluate alternative methods for the separation, at source, at the landfill or by other method, of Industrial, Commercial and Institutional waste. These alternatives have not been addressed in this report.</p>		
Appendix B Table B-1 / Page 56	Item 1	Along with the currently stated subsurface gas barriers and LFG collection system controls, LFG monitoring should be added as a common element not differentiating Alternative Methods.		