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May 23, 2014

File No. 4320-25-FIS

HAND DELIVERED

David Laing
Fisher Road Holdings Ltd.
6844 Oldfield Road
SAANICHTON BC V8M 2A2

Dear Mr. Laing:

**RE: Application for Major Amendment to Facility Licence 003-06
at 1355 Fisher Road, Cobble Hill, BC - CVRD Bylaw No. 2570
Waste Stream Management Licensing Bylaw, 2004**

As the Manager, I have reviewed the above application for a major amendment to the composting and recycling operations at the above property.

Determination on Application

I have determined that the applicant has met the requirements for the granting of the following major amendments subject to a number of strict conditions outlined below:

- An increase in incoming compostable material from 10,897 to 18,000 metric tonnes;
- An increase in stockpiled Class A Compost allowable on-site from 2,640 to 4,400 metric tonnes;
- An allowance for tar and gravel roofing material to be received and stored on site up to a maximum of 15 metric tonnes on-site at any one time and up to 300 tonnes annually shipped from the Property.

In addition I have considered the application to treat residuals from composting, putrescible garbage, residential and commercial garbage and mixed recyclables as one general category with an increased stockpile limit of 50 metric tonnes, with a similar annual throughput to the current licensed amount for all mixed loads of recyclables and garbage.

While I have approved the tonnage limits requested, I have required the continued separation and interior storage of all putrescible garbage, and so have divided the total stockpile limits and tonnage restrictions to reflect this requirement in the License.

The conditions that will be imposed on these major changes are more fully outlined in the License and in this letter below, but include the following:

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- The removal of biosolids as an acceptable material on the Property;
- A comprehensive odour study, and improvements to odour management practices, monitoring, reporting and complaint response;
- Expanded water quality testing;
- A mandatory monitoring regime for the swale, leachate ponds and underground drainage systems;
- Improvements to vector and dust suppression requirements, including the requirement of further study and certification in relation to the use of well water for dust suppression;
- Requiring truck traffic to enter and exit the facility from the highway to reduce traffic near the Cobble Hill village;
- Fully enclosed storage of all putrescible garbage; and
- Improvements to the Facility's inspection and reporting regime.

Review of Application

Public Consultation:

This application for a major amendment has gone through a thorough review which has included a formal public notice of the application, a public information meeting, and independent third party review of the facility operations and the operating plan to ensure compliance with CVRD Bylaw No. 2570 – Waste Stream Management Licencing Bylaw, 2004, the provincial Organic Matter Recycling Regulation (OMRR), and compliance with best practices in relation to composting operations.

The initial application was received by the CVRD on October 24, 2013. Following a staff review of the application documents, and a number of required revisions of these documents, the mandatory 45-day public consultation began March 5, 2014 and ended on April 18, 2014. During this consultation period, approximately 60 written comments from the public were received on the application. Comments received by the CVRD from the public were shared with the applicant for a response.

In light of past and current public concerns with the composting operation at 1355 Fisher Road (both prior to current management of the site, and since the operation of the facility by the applicant), the CVRD requested a public meeting on the application, which I attended. The meeting was held in Cobble Hill on March 31st, 2014. The public meeting was facilitated by Judith Cullington, from Judith Cullington & Associates, a facilitator retained by the CVRD. Information on the application and the composting and recycling operation was provided on story boards and a presentation by FRR. The CVRD provided information on the decision making process and a summary overview of the latest groundwater monitoring results from Thurber's latest report: New Monitoring Well Construction and Well Sampling Fisher Road Groundwater Investigation, February, 2014 on story boards and in a verbal presentation.

Approximately 125 people attended the public meeting. Participants had an opportunity to provide comments, both in writing, on a feedback form, on poster boards and verbally. Participants also had the opportunity to ask questions to both the applicant and to CVRD staff.

The majority of those who attended the meeting expressed concerns with the current operation as well as the application. The key concerns raised by the community with respect to the application were odour, the odour reporting and investigation process, water quality and the potential risk and impact to the groundwater aquifer, the processing of biosolids at the facility, an increase in allowable garbage stored onsite, the processing of out-of-region compostable material, noise, dust, traffic, pests and vectors.

Members of the community also raised concerns regarding the CVRD's ability to regulate and address their concerns through the license approval process authorized under the CVRD Bylaw No. 2570.

The Applicant responded to some of the concerns raised at the public information meeting, as well as comments made in written submissions. Of particular note, for the purposes of my consideration of this application, was an admission by the Applicant's qualified professional that the Facility did not have any particular expertise in the processing of biosolids.

Comments provided in writing to the CVRD have been shared with the applicant for a response. The applicant's response was shared with the persons providing the CVRD with comments.

In its response to the written comments, the Applicant provided information to clarify areas where there had been some confusion in regards to their current operation and the application. For example, Fisher Road Recycling provided information on their methods to protect the groundwater, methods for dust suppression, their future plans to focus on food waste instead of biosolids and their efforts to address odour complaints, including welcoming individuals to contact them directly whenever there is an odour issue. The letter specifically included the following, which I have considered:

While licenced for receiving biosolids, FRR has not accepted any biosolids for at least 4 years, except for a small amount in May a year ago in order to help out another composting facility. FRR has chosen not to pursue biosolids at this time and to only focus on food and yard waste.

Aquifer

FRR has eliminated all contact between compost and soil and collects and re-uses all contact storm water and leachate. FRR will continue to cooperate with the CVRD in sampling the local aquifer, its own well and storm water.

Odour Issues

Over the years, FRR has been the focus of complaints regarding odour. Complaints, especially in the earlier years of FRR's tenure, were substantiated and the company made great efforts to correct the problems.

It is important that odour complaints are dealt with immediately and that FRR staff verifies the type of odour and the weather conditions and where the odour originates in the FRR system. However, there are other sources of odour nearby such as a composting facility and sewage

treatment plants. Currently, FRR receives odour complaints from the public through the CVRD, which can result in an untimely notification and often a lack of information to help correct the issue. FRR would rather receive odour (and other) complaints directly at their facility telephone number: 250 – 733 – 2108. This number will be monitored 7 days a week including evenings. We will then pass on the information to the CVRD together with the results of the investigation. We also participate in the efforts of the CVRD and the other two composting facilities to design a better odour complaint notification system.

Dust

FRR is using water in dust control. Pond water is used in the wetting of materials for grinding of yard and garden waste and wood waste, and well water will be used for dust control on roads. The amounts of well water used on the roads will be minimal and will not affect the aquifer.

Vermin

Nearby residents have voiced concerns about rats frequenting the neighbourhood. FRR has taken this into consideration, and has increased its rodent control program.

Traffic

FRR adheres to the conditions of the existing licence and directs traffic towards the highway and not to the Village. As well, most, if not all trucks approaching FRR come from the highway, and not from the Village.

Third Party Review

In addition to my own inspection of the facility, the CVRD retained CH2MHill to undertake a technical review of the proposed operating plan and amendment application, which included a site inspection of the composting facility. The review was done to:

- Ensure compliance with applicable regulations such as CVRD Bylaw No. 2570 and OMRR;
- Ensure best industry practices in relation to the operation of the facility;
- Review of the conditions and practices that may lead to odour or other nuisances or issues, with recommendations to address any concerns that might arise; and,
- Assess the operating capacity of the composting facility.

In addition, the review also included an assessment of status on the implementation of recommendation put forward by CH2MHill in 2008 when CH2MHill was retained by the CVRD as part of an odours investigation in the Cobble Hill area.

The result of CH2MHill review found that four of the recommendation from 2008 had not been addressed; however, CH2MHill considered that these deficiencies were minor or procedural in nature. CH2MHill also provided recommendations, which included but were not limited to, adjusting some of operating parameters to ensure optimum composting, resulting in reduced

risk of odours, and to implement an improved method to measure ammonia in the airstream to and from the biofilters. I have reviewed some of the specific deficiencies and recommendations below, as part of my review of the license conditions that I have determined should be imposed on the Applicant in relation to this license amendment application.

Importantly, CH2MHill found no conditions or practices at the facility or in the operating plan that would lead to significant odour releases or other nuisance conditions. Nor did they find any conditions that are not consistent with generally accepted industry practices during the site inspection. Overall, it was found that the infrastructure for the composting facility had been significantly improved, and operational practices had also greatly improved since 2008. Their recommendations for further minor improvements have been incorporated into the License as License conditions.

The CVRD also requested Vancouver Island Health to review the FRR application to provide comments in regards to potential public health impacts.

Island Health has issued a public statement regarding odours from composting facilities indicating that there is no health concern regarding these often objectionable odours. They also reviewed a copy of the proposed operating plan, and a summary of the amendment application, and concluded that the amendment application and operating plan did not raise any concerns in relation to health matters.

Finally, three water quality investigations were commissioned by the CVRD and conducted by Thurber Engineering Ltd. These include Fisher Road Groundwater Investigation, (April, 2013), Fisher Road Recycling Ditch and Swale Environmental Testing (May, 2013), and New Monitoring Well Construction and Well Sampling Fisher Road Groundwater Investigation (February, 2014). Although these studies were done in relation to existing operations, they are relevant to the potential impact of an increase in compostable materials processed and stored onsite.

Considerations under Bylaw 2570

The CVRD Bylaw 2570, Waste Stream Management Licensing Bylaw, 2004 (Bylaw 2570) requires that I consider the following matters with respect to the facility proposed in this major amendment application:

5.4 Evaluation of Facility Licence Application. The Manager will consider the following matters with respect to the facility proposed in the application:

- a) The potential risk posed to the environment and public health;
- b) The protection of the environment;
- c) Comments from the host municipality relating to compliance with the local zoning or other bylaws that may affect a facility design and/or operating plan;
- d) Comments from persons who consider themselves adversely affected;
- e) Information received as a result of the fulfillment of the requirements set out in Sections 5.3 and 5.3;

- f) Compliance with the Solid Waste Management Plan;
- g) Any operating plan submitted to the Manager under Section 11; and
- h) Compliance by the applicant with the requirements to pay fees and report as required under this bylaw.

I have considered all of these factors, and consider that the most significant of these issues in this major amendment license application have been as follows:

1. Potential risks posed to human health posed by the proposed increase to the amount of materials processed at the composting facility on the property;
2. Potential risks posed to the environment posed by the proposed increase to the amount of materials processed at the composting facility on the property; and
3. Comments from persons in the community who consider themselves adversely affected, primarily in relation to groundwater quality, and odours and other nuisances that may be caused by the proposed increase to the amount of materials processed at the composting facility on the property.

I note that there are no comments from a host municipality under 5.4(c) with respect to zoning or other bylaws because this Facility is not located in a municipality, but is rather subject to the Regional District's land use and building regulations. In this respect, the land use bylaw does permit in-vessel composting and recycling facilities on this Property.

While I am aware that this application is only for an amendment to an existing License, largely to allow an increase in composted material, and the License conditions I have approved specifically relate to that amendment, I will also address in this letter some of the concerns about the existing operation that were raised through the course of the amendment application process.

1. Human Health

I am satisfied by the response of the Vancouver Island Health Authority (now Island Health) to this application that this amendment application and the accompanying operating plan for the facility, does not raise any threats to human health.

This is not a case where odours from improperly matured and anaerobic compost are being permitted to escape the property. This application is very different from the farm in the Capital Regional District that was accepting far more food waste than it was authorized to accept for the purpose of applying compost to its land, and where it has been established that immature and anaerobic compost was directly exposed to the air. The applicant in this case operates a fully functioning in-vessel composting operation that is compliant with existing applicable regulations. Unlike the operator in the Capital Regional District, this property is zoned for in-vessel composting, and has been found by an independent expert to be substantially in compliance with its operating plan. Finally, the Applicant's facility and operating plan was found to comply with best practices related to composting, subject to some minor corrections and conditions that are addressed in the License.

The community has also raised concerns regarding the impact on human health with respect to the risk of escape of leachate from the property, and its effect on drinking water and ground water in the area. This is a human health concern, as well as a concern regarding the risk to the environment, and I will set out my reasoning with respect to the risks posed to the environment and human health in relation to leachate control and ground water below.

2. Impact on Environment and Health: Ground and Drinking Water

The three independent reports commissioned by the CVRD and prepared by Thurber Engineering are the most relevant factors in my consideration of the impact of the facility, and the potential impact of the expanded operations proposed in the license amendment application.

The Fisher Road Recycling Ditch and Swale Environmental Testing (May 2013) indicated that the swale water is not considered to be "contaminated" under CSR, but is still of some concern that would benefit from further sampling and monitoring. BOD was found to be high, although is not a regulated parameter under the CSR or GCDWQ. The high BOD indicates large concentration of organic matter and bacteria.

Studies of the aquifer underlying the Fisher Road area indicates that two plumes of nitrate contamination exist, which are above the Guidelines for Canadian Drinking Water Quality of 10 mg/L. Of these two plumes, the one that contains the highest concentration of nitrate has been found to lie south of and under the Applicant's property, however isotope analysis shows that the signature of this nitrate falls in the category of inorganic nitrogen fertilizer. A farm business upgradient of the Applicant uses inorganic nitrogen fertilizer as part of their operations. There is no indication that the current or proposed recycling or composting activities on the Applicant's property have or will contribute to this inorganic nitrate plume.

A second plume, with lower nitrate concentrations has been identified downgradient of the Applicant's property, and shows a nitrate signature which falls in the category of decomposing organic matter. The level of nitrate in this plume has been found to range between 15.3 mg/L to 28 mg/L, where samples were taken from the two monitoring wells located down gradient (i.e. North) of FRR and a neighbouring composting facility. This plume may have originated from a variety of sources, which could include either, or both, composting facilities on Fisher Road.

Since September 2011 FRR has moved all compostable material from the operation onto concrete pads, to address concerns over potential impacts to the aquifer and reduce risk of contamination. As contact storm water and leachate collected off these pads is conveyed to lined storage ponds, and then reintroduced into the composting process to maintain desired composting moisture levels, the potential for contamination from FRR's operations has been largely eliminated, provided the system is properly maintained and inspected. To ensure that all leachate and contact storm water systems are kept intact and operational, I have added conditions to the License for the annual monitoring and certification of all leachate collection and management systems.

Ultimately I consider that the requested increase in incoming yard and food waste will not increase the likelihood of groundwater contamination from this facility. No further pads or ponds or structures are contemplated or required for the requested increase, and I am satisfied that the existing concrete pads and leachate collection systems provide the necessary separation from the aquifer provided that they are inspected and maintained regularly, and the drainage and groundwater systems are regularly monitored.

3. Adverse Impact on Community

Through the consultation period the CVRD received many strong responses regarding impact of odours in the area on daily life. While a few commented that there had been substantial improvement in odours, many commented that odours had persisted and that overall impacts continue to be unacceptable.

I have no reason to doubt the sincerity of the many residents who came forward to complain about odours and I accept the validity of their concerns. Odour is an issue with all composting facilities, even ones that are managed with high standards, and there are a number of additional odour sources in this area.

Balanced against these real concerns and adverse impact I also have to consider what has and can and be done to address odour in a facility that is expressly permitted under the applicable land use regulations.

The Applicant has carried out substantial improvements in infrastructure and its operational diligence in recent years to reduce odours. Large, well-maintained bio filters treat exhaust gases from the bio cells and secondary composting in the enclosed fabric building. During my site inspection it was demonstrated that the bio filters are effective in greatly reducing the quantity of odour in the gases generated in the composting building. I am also generally satisfied, based on my review and discussions with CH2MHill, that the Solvita test used by the Applicant is sufficient to ensure that the stored Class A compost has reached a level of maturity and stability that can be objectively verified and monitored. The facility review by CH2MHill indicates that the composting facility is operated at a level consistent with among the best in the industry.

However, with all composting facilities, it is difficult, and perhaps impossible, to attain 100% containment and treatment of all odours, and thus the potential remains for ephemeral odour events that the local community will experience as objectionable. The best systems for maturing compost will still result in some degree of odour; for example the bio-filtration systems themselves are made of wood chips which will give off their own odour. Typically these odours may be described as woody but may also be somewhat objectionable to the neighbourhood. Also, the final compost product will have some odour, mostly described as musty or earthy.

In some cases these odours, which might be acceptable to some, will be highly objectionable to others. For people who lived with odours related to poor composting practices on this same site in the past, odours that are improved but reminiscent of those past odours may continue to have a significant adverse effect.

A further complexity with the odour issue is the presence immediately adjacent to the Applicant's facility of another composting operation at Central Landscaping. My review of odour events and complaints in the area reveals that some of these complaints correlate with activities at Central Landscaping, such as compost pile turning, which is clearly a potential source of odours. Also the CVRD operates sewage treatment facilities on Hutchinson Rd, Princess Avenue and Sitka Way, which also generate odour.

In summary, I have concluded that odours from this facility and others in the area are a serious imposition on the community and in some cases result in a significant impact on quality of life. I consider that this issue cannot be left unresolved and requires further efforts by the Applicant to diminish this impact to the greatest reasonable degree possible.

My review of the improvements to the Applicant's facility and operating plan, management practices, complaint response and odour monitoring, including the review of CH2MHill, indicates that while a great deal has been done to control odours from the facility, more can and should be done to identify, monitor and abate odour at the facility. I am also satisfied, however, that this work can be done, and I have made it a condition of the requested increase in compostable material to be received as a result of the license amendment at the Applicant's facility.

License Amendment and Conditions

The Applicant's major amendment application relates to both the composting facility and the recycling centre on the property. With respect to the composting facility, the application seeks:

- An increase in incoming compostable material from 10,897 to 18,000 metric tonnes; and
- An increase in stockpiled Class A Compost allowable on-site from 2,640 to 4,400 metric tonnes.

In relation to the Recycling Centre, the amendment application seeks:

- An allowance for tar and gravel roofing material to be received and stored on site up to a maximum of 15 metric tonnes on-site at any one time and up to 300 tonnes annually shipped from the Property;
- The consolidation of all categories of mixed load recyclables and garbage and refuse into a single category, with an increase in on-site storage from 8.8 metric tonnes in the Composting facility and 11 metric tonnes in the Recycling Centre, to a total of 50 metric tonnes on-site metric tonnes.

In consideration of the factors above, I have issued a license amendment that permits the increase in materials at the composting facility subject to increased and improved monitoring and accountability requirements in relation to leachate and odour escape.

I have allowed the addition of tar and gravel roofing at the recycling centre, and I have granted a total on-site storage of mixed recyclables and garbage to a maximum of 50 metric tonnes when combined, but I have imposed requirements that continue to require the separation of putrescible waste from mixed recyclables, with a lower limit on residual and incidental putrescible waste permitted on the site.

The License imposes a number of conditions in relation to these major amendments, many of which are already incorporated in the Applicant's operating plan or contemplated in the Applicant's response to the community in relation to this application. Their inclusion in the License increases the accountability and enforceability of these commitments, and in some cases, improves upon them.

These conditions include the following:

- The removal of biosolids as an acceptable material on the Property

This condition is in response to the significant concerns raised by the community with respect to the potential health and odour implications of this material being included in the compostable material processed at the Facility. Given that the increase in food waste and compostable material requested and authorized in this license amendment has the potential to add to odour at the facility (even if that odour is only of properly matured and maturing compost), I do not consider that the additional odour that may be generated by biosolids has been adequately addressed in the Applicant's materials. Indeed, I rely, in part, on the Applicant's concession that they have little experience, expertise, or interest, in processing these materials.

- A comprehensive odour study, and improvements to odour management practices, monitoring, reporting and complaint response

It is clear from the comments made by neighbours and the surrounding community that odour is a major issue affecting residents' quality of life in Cobble Hill, to which the Applicant's facility contributes; the increase in compostable material processed, and general refuse stored on the property may, if not managed properly, increase the risk of these odours.

It was also clear from my own review and the response of the Applicant to these concerns that there are other odour sources in an around the area that contribute to these complaints. In addition, some odours, while objectionable to some, may be related solely or primarily to fully mature compost and the properly working bio-filters, while others may be related to lapses in required operational requirements or other concerns.

In my view, it is a necessary condition to any increase in the compostable materials processed on site that certified independent odour investigations be conducted, and that improved monitoring processes certified by a person with expertise in the area, be implemented. The License terms and conditions address these conditions.

- Expanded water quality testing

The Thurber reports identify and support the need for regular and comprehensive water quality monitoring, particularly in relation to leachate escape, and the use of the existing well that has been determined to contain unacceptable nitrate loads.

- A mandatory monitoring regime for the swale, leachate ponds and underground drainage systems

The application, and my approval of it, relies upon the separation of all leachate from the ground. The maintenance and proper functioning of all leachate collection systems is essential, and therefore annual reviews and certifications of these systems by a qualified professional is a condition of this License amendment.

- Improvements to vector and dust suppression requirements, including the requirement of further study and certification in relation to the use of well water for dust suppression and equipment wash.

The Applicant has committed to improved vector management and control. Monitoring of this commitment is a condition of the License.

Comments made by the Ministry of Forest Lands and Natural Resources Operations, as well as by Thurber Engineering, indicate that the use of the contaminated well water for dust suppression and other uses needs to be further evaluated before it can be relied upon by the Licensee. However, I consider that this requirement can be met by way of a condition in the License, rather than its outright refusal, and I have therefore incorporated a condition relating to further studies in this regard, before this method of dust suppression may be utilized.

- Requiring truck traffic to enter and exit the facility from the highway to reduce traffic near the Cobble Hill village

This is a condition that is already generally contemplated in the Licensee's operating plan, but has been directly incorporated into the License terms, to address the adverse impact of traffic on the neighbouring community. This is particularly important in light of the Applicant's proposal to use fewer but larger trucks to haul mixed recyclables from the property.

- Fully enclosed storage of all putrescible garbage

In its initial major amendment application, the Applicant requested an increase in the onsite storage of residuals and putrescible waste in its composting facility from 8.8 metric tonnes to 15 metric tonnes. The Applicant also requested that the existing categories in the Licence that relate to "Garbage/General Refuse from residential sources," "Garbage/General Refuse from commercial sources," and "Mixed Recyclables/Mixed Loads" be combined in a single container of up to 35 metric tonnes at the recycling centre, to reduce the number of containers and loads hauled by the Applicant.

The Applicant committed in its operating plan to ensuring that all putrescible garbage received at the facility would be stored indoors at the composting facility. The Applicant has communicated to CVRD staff that they have indoor storage capacity inside the composting facility for these putrescibles. The Applicant has explained to the CVRD staff that they propose to store the remainder of the mixed loads in the recycling facility and that this material will be removed and emptied at least weekly. When shipped, the material can be shipped in a single 35 tonne container. Total annual output of this material was stated to be 4,000 metric tonnes in that application.

As this container is not stored indoors, it is not proposed that any putrescible garbage would be stored within it. The Applicant has also indicated that this bin would not be simply hauled to a dump, but would be taken to a larger facility for further sorting of recyclable materials, for example for the removal of Styrofoam and other recyclable materials.

The current application and operating plan nevertheless combines the two types of refuse: one containing putrescibles and compost residuals, and the other containing only non-putrescible materials intended for further sorting. The total requested annual output for both was stated to be 5,485 metric tonnes, which I assume includes the 4,000 metric tonnes from the recycling centre, and another 1,485 metric tonnes that would relate to the containers of putrescibles kept indoors at the composting facility.

Residents at the public information meeting raised concerns about the increase to 50 metric tonnes of unrestricted types of garbage being stored on the property, and the appearance that that creates that the primary recycling function of the facility is being displaced by a waste transfer function. My understanding, however, is that this is not, in fact, the intent or purpose of this License amendment.

I have therefore reinstated the original applied for division between garbage (putrescible materials stored within the composting facility) at 15 metric tonnes, with a maximum annual output of 1,485 metric tonnes, and the storage of mixed recyclables (non-putrescible materials that are destined for further sorting at another facility) with a limit of 35 metric tonnes and a 4000 metric tonne annual output.

- Improvements to the Facility's inspection and reporting regime

Finally, a major concern raised by the community was monitoring and accountability of the facility and the CVRD. To ensure that the facility is complying with its operating plan and procedures, as well as any conditions imposed or that may be imposed on the facility as a result of this amendment the License includes better sharing and reporting of information by the operator to the CVRD, in addition to additional monitoring requirements.

The License therefore includes more rigorous monitoring and reporting requirements, many of which require independent verification by a qualified professional, which will ensure that the conditions put in place to prevent risk to health and the environment, and adverse impacts on the community, are addressed and enforced.

The CVRD will also implement a new complaint reporting and investigation process, where complaints may be submitted on a 24 hour basis through an online form to the CVRD which are shared with the two composting facilities on Fisher Road. The CVRD is also committed to improvements in investigations of these complaints.

Conclusion

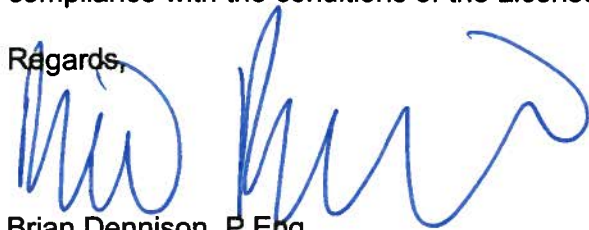
In conclusion, I have reviewed the substantial materials submitted by the public, the Applicant, and third party experts, and outside agencies in relation to this major amendment application. I have considered the factors that I am authorized to consider under the bylaw, including the potential impact of this amendment on public health, the environment, and groundwater, as well as the impact of the facility on its surrounding community in relation to vectors, traffic, and, most significantly, odour.

In considering whether to issue this License amendment I have had to balance the compelling community concerns regarding the historic, current and potential impact of this facility, against the evidence that the operator has substantially improved the infrastructure and operating conditions at the facility, to the extent that our third party qualified professionals have indicated that the Applicant is essentially meeting established best practices in relation to odour management and suppression, and has the capacity to handle the increased volume while still meeting these standards. Additional odour studies, investigation, and vigilant monitoring are, however, required to ensure that the authorized increase of materials at the facility does not further detrimentally impact the community.

The leachate control measures also satisfy me that, subject to the conditions I have imposed in relation to maintenance, certification and monitoring, the requested increase can be managed without increasing the risk to ground and drinking water.

Overall, I am satisfied that the amendment application ought to be granted subject to strict compliance with the conditions of the License I have imposed.

Regards,



Brian Dennison, P Eng.
Manager
Engineering Services

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Enclosure

pc: Ilse Sarady, Environmental Technologist

