

Complaints: Submitted via email on January 20th, 2014 (No response to date-March 25th, 2014)

Good day Mr. Packer. I am submitting the following complaints as well as the complaints from April 2013 (please see attached) for which there has been no response. I look forward to your reply. It would be appreciated if you could confirm that you received this email.

1. **Non-compliance with Scugog agreement.** Greenbank is not currently tracking license plates as you stated on January 16th, 2014. This is a requirement of the fill protocol and therefore a requirement of the agreement-how will this be rectified?

2. **Non-compliance with Scgog permit.** Soil is spilling over the fence onto the adjacent property contrary to permit approvals-how and when will this be rectified?

3. **Posting of audit reports.** Audit reports are not being posted in a timely fashion-sometimes 1 month after the results are received-concern is that they may not be looked at in a timely fashion as well-is Township receiving them any earlier than they are being posted on the portal? Can the tests be posted when they are received or within a few days of being received ?

As indicated in my July letter last year, I was hoping to be given some answers to the questions I sent to Doug in July 2013 and later to you, so that I could better articulate a complaint/concern letter to you. As I have had no response, I have listed the following complaints:

4. **No volumes indicated.** There are no volumes specified for GFL batches WC through to FFC-1 on the portal from GFL. How does your admin staff know how many tickets to give out? How do they know that the required number of “end of treatment tests” have been done at GFL that allows them to say soil is now “clean”.

5. **Observing Fill protocol.** DLS said they are screening a great deal-but in June last year --35 loads of really heavy smelling petroleum hydrocarbon soils was dumped- a neighbor could smell it over on the next farm-protocol indicates that every load is to be observed **as it is dumped**-how did 35 loads of bad smelling

stuff get dumped if every load is looked at as it is dumped and the smell was really strong...?

6. Notification re: Bad fill. For those Bad smelling June 2012 loads, DLS staff did not email GFL until **later** that evening-source site and Township should be notified immediately when there is bad fill.

7. Timeline for removing bad fill. GFL was allowed to keep importing fill during the summer while the contaminated fill was still on site. No source site should be allowed to import fill while their unacceptable fill remains on site.

It was indicated that all bad fill deposited at Greenbank came from GFL. Doug Leblanc indicated at the last October PLC meeting that they are “always” turning away GFL trucks. There should be clear rules and a zero tolerance policy re: bad fill and especially if the same source site keeps having problems. Is the Township notified when loads are rejected on site, or “turned away”, as Doug indicated.

8. Approval of fill volumes. There are not enough soil tests for the quantity of approved fill from GFL for the November 2012, December 2012 and January 2013 batches.

GFL has strict end of treatment testing for the specified quantities of treated soil. These tests are required to show the soils are "clean". DLS indicated that the results on the portal were the end of treatment tests as per a conversation with Kevin back in April last year. It was indicated that some of the November batch was sent back for reprocessing. However, the Agat tests already indicated that some tests were removed. Agat tests only indicate end of treatment testing results for a volume approaching 3000 cubic metres not the approved 15,000 cubic metres. DLS just posted additional November 2012 tests, however they were reported after DLS had already approved the 15,000 cubic metres for November. The December Batch and the January batch still do not have the required number of tests. While the December batch is approaching the correct testing number, if one considers the newly posted November batch, it is still not enough.

9. Issuing tickets. It is a concern that when asked how you issue tickets that your answer was, "depends on how much they want to pay" with no mention of the approved volumes of fill that DLS writes in the reports addressed to you. A volume needs to be approved as soil tests should correlate to the volume being approved. This way you know how many tickets you should give out based on what was tested and approved to be acceptable. If volumes change, (as Scott indicated- volumes approved do not always reconcile to what is actually deposited) who gets

notified, how do they get notified and how are those changes tracked so that only tickets for the tested fill and approved volume of fill are issued?

10. **Resubmitting** complaints from last April 2013-please see attached.

Thank you for your consideration.

regards,

Carmela Marshall

LCCW