

LCCW Deputation to Scugog Council re: Greenbank Permit

Speaking notes

Feb. 4th, 2013

Good afternoon and thank you for hearing our deputation today.

As we recognize the deadline for the Greenbank final permit agreement is approaching, LCCW would like to share some concerns and recommendations going forward. We will be addressing specific sections from the agreement as listed in our report.

We note that the groundwater monitoring details are not listed in the agreement. We are requesting a copy of the "site monitoring plan" **as mentioned in section 3**, as perhaps groundwater monitoring details are located in this document.

We will come back to section 4 when we address the fill quality control plan.

For section 6, which addresses noise and dust control plans, we submit that the 7am-7pm time is not restrictive enough and does not allow for proper oversight by township staff during normal business hours. These times do not consider the much earlier times trucks will be travelling on the haul routes past communities and private homes. Furthermore, the agreement does not address truck **volumes**. We understand that the MTO permit, which expires March 4th, indicates a maximum of 200 trucks a day. While the MTO can really only consider safety and road impacts on **provincial** property, it is the **responsibility** of the **township** to consider and mitigate the social impacts that arise from approving site-alterations of this size.

The township **does** have the ability **to further restrict** the volume of trucks per day **beyond** what MTO has permitted. We would ask that the township respects the voices of their citizens regarding quality of life issues and trucks, and **include** volume and operating time amendments in the final agreement

For section 10 of the agreement, although the portal was intended to provide transparency, we feel this has not been achieved. Citizens are still being left in the dark as to the origins of the fill.

As well, there are significant concerns with the volume of fill that is being approved for each source site and the number of soil tests that were used to approve these sites. **The amount of testing compared to the volume of fill coming into Greenbank is not enough.** If you look at Table 1 on the last page of the report, you can see that for some of the sites, the volume of fill was not disclosed yet **few tests** were included or **none at all**.

LCCW is aware of several large fill sites that have received inappropriate fill **despite professional** oversight. The township needs to do their due diligence; they **must document and enforce minimum** testing requirements of incoming fill following the MOE's requirements for brownfield sites which equates to roughly **1 test for every 160 cubic metres** of imported fill.

And with regards to our remarks regarding the lack of monthly audit tests, these were not listed on the portal until **quite** recently so perhaps these remarks no longer apply.

For section 11b), the 3 day time limit the township is being given to review source site information is **not** enough. In Pickering, the city had to hire a consultant who then sent their staff member **to visit** one of the source sites in order to determine if acceptable procedures were in place. The time constraint imposed on the township **limits** this kind of **necessary** review.

For section 13, we note that the statement would allow Greenbank to **potentially** obtain fill from out of province and out of country. If issues do arise with the acceptability of sites, and the township would like to visit certain source sites as Pickering did, this would prove difficult if the sites were located outside the GTA or outside of Ontario and would prove quite impossible if sites were out of the country, especially given a 3 day time limit.

Regarding section 15, the Township should not be limited to taking samples only when Green Banks's QP is present as the QP may not always be there.

Regarding section 22, we submit that in order to ensure due diligence on the township's part, a qualified person, experienced in site assessments, **should have been retained by the Township** in order review **all** incoming documentation. We would like to understand if this has been considered.

Also, it has been indicated that the township may be signing a 2 or 3 year agreement this coming March. We feel this is too long and would prevent necessary changes from taking place **should the need arise** before the end of a 2 or 3 year term.

With regards to the fill quality control plan, page 2 indicates that a soil management plan is to be provided to Greenbank's QP by the source site. The Township should be receiving this information as well, along with any phase 1 and phase 2 information from source sites. The **agreement** should **clearly stipulate** that the Township requires these documents for source site approval.

Also on page 2 of the quality control plan, we recommend that GFL should not be exempt from the conditions we have listed there, for the reasons we have provided.

The footnote at the bottom of page 3 should be removed for the reasons provided in the report.

And finally from page 4, we have already discussed the importance of frequent testing. Also, we would appreciate understanding how much **independent** testing the township has done and how that relates to the quantity of fill deposited at Greenbank to date.

We **have** provided a summary of our recommendations in the Deputation Report. We respectfully request that that the Township adopts our recommendations and would **appreciate a rationale** if they are rejected. As well, we would appreciate responses to the **questions** we have listed on the last page as most of these were **initially** asked in December of Scugog staff.

Thank you for your attention.