

Bagg's Road Waste Disposal Site
Report on Compliance with
O. Reg 127/01

Prepared For:

North Renfrew Landfill Operations Board



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May 9, 2007

North Renfrew Landfill Operations Board
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**Attention: Mr. James Leon
Waste Management Coordinator**

**Reference: Baggs's Road Waste Disposal Site
Report on Compliance with O.Reg. 127/01
Our Project No. 06001**

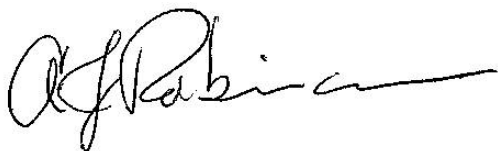
Dear Sir:

We are pleased to provide you with the report on Compliance with O. Reg. 127/01 for the Baggs Road Waste Disposal Site for the 2006 operating year. The NPRI and the MOE were notified through the online Environment Canada OWNERS system before June 1, 2007 that reporting is not required for the facility for 2006.

We trust that the contents of this report are satisfactory. Please do not hesitate to contact the undersigned should you have any questions.

Yours very truly,

ROBINSON CONSULTANTS INC.



A.J. Robinson, P.Eng.
Project Manager



Barbara Minor, M.A.Sc.
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1.0 INTRODUCTION

Ontario Regulation (O. Reg. 127/01) "Airborne Contaminant Discharge – Monitoring and Reporting" [1] took effect on May 1, 2001 (The Regulation). The Regulation requires that the owners of waste disposal facilities in the province calculate and report air emissions if specific criteria are met. These criteria are included in the Regulation, and discussed in the Ontario Ministry of Environment (MOE) Step by Step Guideline for Emission Calculation, Record Keeping and Reporting for Airborne Contaminant Discharge [2]. In addition, the MOE Guideline [2] includes the procedures for the calculation and reporting for airborne contaminant discharges. The contaminants that require annual reporting, if the respective reporting criteria are met, are listed in Tables 2A and 2B in the MOE Guideline [2].

Annual reporting to the National Pollutant Release Inventory (NPRI) is also required if the criteria included in the Guide for Reporting to the National Pollutant Release Inventory [3] are met. Substances in the NPRI are listed annually in the Canada Gazette [4], and summarized in the NPRI Guide [3]. Any person who owns or operates a waste disposal facility in the province during the 2006 calendar year must report to the MOE and NPRI by June 1, 2007 if the respective reporting criteria are met.

2.0 THE FACILITY

Table 1 in the MOE Guideline [2] includes waste disposal facilities in the Waste Management and Remediation Services sector. They are listed as "Waste Treatment and Disposal" with a North American Industry Classification System (NAICS) code 562210.

The following is the list of landfill site characteristics for the Baggs Road Waste Disposal Site:

- The amount of total working hours spent by facility staff at the site in 2006 was less than 20,000.
- There was no co-disposal of hazardous waste during the landfill history.
- There is no gas collection system at the site.
- There is no leachate collection system at the site.
- There is no waste combustion at the site.
- There is no biomedical or hospital waste incineration at the site.

3.0 REPORTING TO THE NPRI

The NPRI Guide [3] provides an overview of the reporting requirements for the NPRI substances. The substances and groups of substances listed in the 2006 NPRI are divided into five parts (1A/1B, 2, 3, 4, and 5) according to their different sets of reporting criteria.

3.1 Part 1A, 1B, 2, and 3 Substances

The criteria for which a facility has to report to the NPRI are provided in Figure 2 of the NPRI Guide [3]. To determine whether or not the facility has to report for Part 1A, 1B, 2 or 3 substances to the NPRI, the Guideline provides two decisions based on flow charts. **Table 1** outlines the questions and answers to these charts:

Table 1
Criteria for Reporting to the NPRI for 2006

Questions	Answers
Was the facility exclusively used for the exploration of oil or gas, or drilling of oil or gas wells?	No
Is the owner/operator exempt from reporting Part 1A, 1B, 2 and 3 substances for 2006?	No
Did the employees work a total of $\geq 20,000$ hours in the 2006 calendar year?	No
Were activities to which the 20,000-hour employee threshold does not apply carried out at the facility?	No

According to the above answers, the owner/operator is not required to submit a report for Part 1A, 1B, 2 or 3 substances.

3.2 Part 4 and 5 Substances

Figure 3 from the NPRI Guide [3] provides the criteria for which a facility has to report to the NPRI for Part 4 and 5 substances. Table 2 summarizes the criteria for reporting:

Table 2
Criteria for Reporting Part 4 (CACs) and Part 5 (Speciated VOCs)
Substances to the NPRI for 2006

Questions	Answers
Was the facility exclusively used for the exploration of oil or gas, or drilling of oil or gas wells?	No
Was the facility used exclusively for an activity where only CAC emissions from stationary combustion equipment are considered?	No
Was the facility a pipeline installation?	No
Did employees work a total of 20,000 hours or more in the 2006 calendar year?	No
Were activities to which the 20,000-hour employee threshold does not apply carried out at the facility?	No
Was any stationary combustion equipment operated at the facility?	No

According to Table 2, the owner/operator is not required to submit a report for any Part 4 or 5 substances.

Through the review process outlined in the NPRI Guide [3] it is determined that the facility is not required to report to the NPRI for the 2006 calendar year.

4.0 REPORTING TO THE MOE

The MOE Guideline [2] presents the reporting requirements for the Regulation [1]. The list of contaminants and groups of contaminants are divided into two lists, which appear as Table 2A and Table 2B in the MOE Guideline [2]

4.1 Table 2A Contaminants

The Regulation requires that the owner and operator of a facility calculate the air emissions of contaminants listed in Table 2A of the MOE Guideline [2] during the 2006 calendar year if the following criterion is satisfied:

- The facility can reasonably be expected to have, at any time during the year, a name plate capacity of greater than 3 million British Thermal Units (BTUs) per hour.

The facility does not meet the above requirement. Therefore, reporting for the Table 2A parameters is not required.

4.2 Table 2B Contaminants

Owners and operators of facilities must ensure that air emissions of contaminants in Table 2B are monitored and reported for the calendar year if the contaminants are manufactured or processed or otherwise used at a facility during the year and both of the following criteria are satisfied:

1. The facility can reasonably be expected to employ or engage persons who will together work a total of 20,000 hours or more during the year.
2. The contaminant can reasonably be expected to be manufactured or to be processed or otherwise used at the facility during the year in an amount equal to or greater than the threshold amount for the contaminant set out in Table 2B of the MOE Guideline.

Because the total work hours at the facility are less than 20,000, criterion 1 is not satisfied, and accordingly, reporting for Table 2B parameters is not required.

5.0 CONCLUSIONS

According to the NPRI Guide [3] and the MOE Guideline [2], the Baggs Road Waste Disposal Facility does not meet the 2006 reporting requirements. As such, the facility is not required to report Part 1A, 1B, 2, 3, 4, or 5 substances to the NPRI for the 2006 calendar year. Similarly, reporting to the MOE for contaminants listed in Tables 2A and 2B is not required for the 2006 calendar year.

The NPRI and the MOE were notified through the online Environment Canada OWNERS system before June 1, 2007 that reporting is not required for the facility for 2006.

6.0 REFERENCES

1. Ontario Regulation (O.Reg. 127/01) "Airborne Contaminant Discharge Monitoring and Reporting", 2001 (amended February 15, 2006).
2. "Step by Step Guideline for Emission Calculation, Record Keeping and Reporting for Airborne Contaminant Discharge", Ontario Ministry of the Environment. Revised: February 2006.
3. "Guide for Reporting to the National Pollutant Release Inventory", Environment Canada, 2006.
4. Canada Gazette, Part I, Ottawa, Saturday, February 25, 2006, Vol. 140, No. 8.