

Public Submission to the Environmental Registry of Ontario

Subject: Comments on GFL Environmental Services Inc. – Air & Noise Environmental Compliance Approval (Stoney Creek Landfill)

ERO Posting Number: 025-1000

Submitted by: Susan Chapman

Date: October 27, 2025

1. Introduction

I am submitting these comments regarding **GFL Environmental Services Inc.’s application for a new Environmental Compliance Approval (Air & Noise)** for its landfill at **65 Green Mountain Road West, (Stoney Creek Landfill)**. *I have been trying for weeks to comment on the ERO website however attempts to log on, register for a new account or reset my password have been futile as a link to my email is never sent.*

This landfill has been a source of long-standing community concern, and this new approval—covering emissions from the **leachate treatment plant**—presents an important opportunity for the Ministry of the Environment, Conservation and Parks (MECP) to strengthen protections for local residents, workers, and the surrounding environment.

2. Air Quality and Odour Control Concerns

The leachate treatment plant is a significant potential source of **volatile organic compounds (VOCs), ammonia, hydrogen sulfide (H₂S),** and other **odorous or hazardous air pollutants**. Given the proximity of homes, schools, and agricultural areas, it is essential that the approval include **strict and enforceable emission limits** and continuous monitoring requirements.

I respectfully request that the MECP require the following conditions:

- **Continuous air monitoring** for key odorous and health-relevant compounds (H₂S/TRS, ammonia, nitrogen oxides, methane, ozone, VOCs and particulate matter – PM 2.5) at multiple boundary points including **monitors within the community** (in close proximity to the landfill) that would allow for real time investigation and legal enforcement for exceedances.
- **Public disclosure** of all monitoring data through an online portal or annual environmental performance report.
- An updated **air dispersion model** using local meteorological data and worst-case scenarios for odour and chemical emissions.

- **Odour control measures** such as carbon filtration, bio-filtration, or air scrubbing for all leachate handling and treatment processes, ensuring emissions from the landfill are kept to a bare minimum and well below Ontario criteria.
 - A **verified Odour Management Plan** with clear performance standards and response timelines for complaints.
 - A **publicly accessible complaint hotline and log**, with required follow-up reporting to the City of Hamilton and MECP.
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3. Noise Impacts

Residents have reported significant concern about **noise from equipment, trucks, and the treatment process** at the landfill site.

I request that the approval include:

- A **comprehensive noise assessment** that accounts for cumulative operations (landfill machinery, leachate treatment, and haul traffic).
 - **Noise attenuation measures**, such as acoustic barriers or operational restrictions during nighttime hours.
 - **Ongoing noise monitoring**, especially during seasonal changes or expansion activities, with annual reporting to the public.
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4. Health and Community Protection

Given the proximity of the landfill to residential areas and the cumulative impacts of odour, dust, and emissions over time, the MECP should:

- Require a **screening-level Human Health Risk Assessment (HHRA) and Health Study** specific to emissions from the leachate treatment plant. For years, residents have been complaining of health concerns ranging from mild (sore throat, irritation, nausea, migraines) to severe (asthma admissions to hospital, neurological concerns, cancer). The surrounding community deserves every measure to safeguard their physical, mental and emotional health and wellness.
- Include **sensitive receptors** (children, elderly, those with respiratory conditions) in the risk assessment.
- Consider **cumulative exposure** from other landfill operations, including flaring, gas collection, and waste handling.

5. Transparency and Oversight

Public trust can only be maintained if monitoring data and compliance records are transparent. I therefore request that the MECP include conditions requiring:

- **Regular public reporting** of air and noise monitoring data.
- An overhaul of the **Community Liaison Committee (CLC)** to review monitoring results, discuss community concerns, and make recommendations. Consideration for a paid administrative role would be effective. Community emails to the CLC should **not** be vetted through the company.
- **Third-party verification** of emissions data funded by GFL but conducted by independent experts.

6. Conclusion

The community surrounding the **Stoney Creek Landfill** has lived with landfill-related odours and emissions for many years. As this approval concerns **air and noise impacts from the leachate treatment plant**, the Ministry must ensure that **best available technology, independent oversight, and public transparency** are non-negotiable conditions of approval.

Without strict monitoring, public reporting, and enforceable limits, this ECA would fail to adequately protect community health and the local environment.

Thank you for the opportunity to provide input on this important decision.

Sincerely,

Susan Chapman

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