

Public Submission to the Environmental Registry of Ontario

Subject: Comments on GFL Environmental Inc. – Leachate Treatment System Upgrade, Stoney Creek Landfill

ERO Posting Number: 025-1045

Submitted by: Susan Chapman

Date: October 27, 2025

1. Introduction

I am submitting these comments regarding **GFL Environmental Inc.'s proposal to upgrade the leachate treatment system** at the **Stoney Creek Landfill**, located at **65 Green Mountain Road West, Stoney Creek**, as posted under **ERO #025-0991**. *I have made several attempts to comment on the ERO website however efforts to log on, register for a new account or reset my password have been futile as a link to my email is never sent.*

While improving leachate management and odour control is essential, the community must be confident that this project will truly **reduce emissions and protect water quality**, not simply relocate or mask problems. The new system must include strong safeguards, transparent monitoring, and enforceable conditions to protect public health and the environment.

2. Protection of Surface Water, Groundwater, and Sewer Infrastructure

The project description indicates that the treated leachate will be discharged to the **City of Hamilton sanitary sewer** after treatment to meet sewer use bylaw standards. To ensure that this discharge poses no risk to local water resources or municipal treatment systems, I request that the MECP require:

- A **comprehensive characterization** of the leachate, including emerging contaminants such as **PFAS, micro-plastics, pharmaceuticals, and heavy metals**.
- **Demonstrated treatment performance** for these compounds, with clear effluent quality objectives prior to sewer discharge.
- **Require a comprehensive hydrogeological study reviewed by independent experts**.
- **Continuous monitoring** and reporting of key parameters (e.g., ammonia, BOD, COD, suspended solids, metals, PFAS) with monthly public summaries.
- **Establish clear action thresholds for contaminants (e.g., leachate indicators, PFAS, heavy metals)** that trigger immediate investigation and remediation.
- **Verification that the City's wastewater treatment system** can safely handle the load and contaminants without degrading Hamilton Harbour or the local watershed.

- A **contingency plan** in case the treatment system fails or the effluent exceeds sewer bylaw limits.
 - Ensure installation of multiple monitoring wells both upgradient and downgradient of the landfill.
 - Mandate public access to groundwater monitoring data through annual reports posted online.
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3. Odour Control and Air Quality

The proponent states that the new system will be enclosed indoors to improve odour control. This is a positive step, but effective odour management depends on **design, maintenance, and accountability**, not enclosure alone. I therefore request that:

- The facility include **state-of-the-art odour control technology** (e.g., bio-filters, activated carbon, scrubbers).
 - A **verified Odour Management Plan** be required as a condition of approval, including odour source testing and maintenance protocols.
 - **Continuous or frequent perimeter odour monitoring**, offsite of the landfill yet within close proximity to the facility, be conducted to confirm real reductions in emissions.
 - A **publicly accessible odour complaint system** be established, with mandatory response timelines and annual reporting to the MECP and City of Hamilton.
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4. Transparency, Oversight, and Reporting

To ensure public confidence in the upgraded system, I request that the MECP include conditions requiring:

- **Annual public reporting** of leachate treatment performance and compliance results.
 - An **independent third-party audit** of system operation and monitoring data, funded by GFL but selected jointly with the community or municipality.
 - An overhaul of the **Community Liaison Committee (CLC)** to include residents, Indigenous representatives, and local officials to review monitoring results and provide input on future improvements. Consideration for a paid administrative role would be effective. Community emails to the CLC should **not** be vetted through the company.
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5. Human Health and Environmental Risk

Although this project is presented as an upgrade, the **potential increase in leachate handling and treatment processes** could increase short-term emissions, traffic, and chemical storage risks. Therefore, I ask that the Ministry require:

- A **screening-level Human Health and Ecological Risk Assessment (HHERA)** specific to the new treatment system.
 - Assessment of **cumulative impacts** from all landfill operations, including gas flaring, odour emissions, and wastewater discharges.
 - Clear **emergency response procedures** and communication plans for spills or treatment failures.
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6. Regulatory Alignment and Conditions of Approval

The ECA and project design should fully comply with:

- **Ontario Regulation 232/98 (Landfilling Sites)**
- **Environmental Protection Act (EPA)**
- **Clean Water Act and Safe Drinking Water Act**
- **City of Hamilton Sewer Use By-law (No. 06-151, as amended)**

The approval should include **enforceable performance criteria** for effluent discharge, odour emissions, and monitoring, with mandatory corrective actions for any exceedances.

7. Conclusion

Upgrading the leachate treatment system at the Stoney Creek Landfill presents an opportunity to meaningfully improve environmental protection — but only if it is accompanied by **rigorous monitoring, transparent reporting, independent oversight, and enforceable limits**.

I respectfully urge the MECP to ensure this approval includes clear, measurable performance requirements and ongoing community engagement to protect residents, water quality, and local air quality for the long term.

Thank you for the opportunity to provide comments.

Sincerely,

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