

GFL Environmental Inc.

Instrument type: Environmental Compliance Approval (Sewage)

ERO Posting Number 025-1045

Comments from City of Hamilton

General

The City of Hamilton requested an extension until November 28th to provide comments on ERO Number 025-1045 (Ministry Reference 2081-DJ5Q63) from MECP on November 05, 2025. The City only received the related file on November 4, 2025, as it was not posted on the Environmental Registry of Ontario (ERO) website. When Ministry staff attempted to send the file directly to the City upon request, it could not be delivered due to a system error.

Given the short timeframe and the number of internal teams involved in this review, additional time was required to ensure a thorough and coordinated response. City departments, including the Compliance and Regulation Section, Water and Wastewater Planning and Capital team, and the Source Water Protection team, reviewed the application to provide comments.

A confirmation email was received by MECP on November the 07th to directly submit the comments to following recipients after the November 08th deadline if required.

- envirop permissions@ontario.ca
- Fariha.Pannu@ontario.ca
- Yousouf.Kalogo@ontario.ca
- Khalid.Hussain@ontario.ca

Application Form

1. Comment: 2.3 (Project Type) It is understood that the landfill accepts wastes from industrial, commercial, and institutional sources (see application pdf page 59, slide 6). Should 'Sewage – Private' also be checked?
2. Comment: 2.5 (Other Approval/Permits) The list of Sewer Use Permits needs to be updated (eg current Sulfate Compliance Permit 250825-C). The Sewer Use By-Law Permits will likely have to be renewed since they require the installation and operation of the Leachate Treatment System by January 1, 2026.
3. Comment: 5.3.1 (Facility Information – Sewage Plant) No information provided: Does the pumping station pump directly to a sewage treatment plant? Y/N- No
4. Comment: 5.3.1 (Facility Information – Sewage Plant) No information provided: Sewage Treatment Plant Details, Facility Type, Municipal or Private Facility; Category; Maximum design capacity

GFL Environmental Inc.**Instrument type: Environmental Compliance Approval (Sewage)****ERO Posting Number 025-1045****Comments from City of Hamilton**

Effluent Quantity

5. Storm and Sanitary Servicing Details:

The storm and sanitary servicing details are being assessed through the City's formal development application review process. No new connections or changes to site servicing may proceed without approval through SPA-25-040.

Maximum flow rates from the leachate treatment facility referenced in the meeting minutes from February 12, 2024 are much lower than the ultimate discharge rate to the Mud St sanitary sewer per the sanitary design sheet (83.38 L/s). Hamilton Water has not received a downstream capacity analysis confirming if the receiving Upper Centennial sewer system can accept the proposed flows of 83.38 L/s from the leachate treatment facility. A downstream sanitary capacity analysis is expected to be included in the SPA submission and subject to review and approval.

6. Plant Operations Section has a current agreement with GFL. The process is during wet weather when Plant Operations reaches a trigger point for "primary effluent overflow", Operations contacts GFL to cease pumping leachate. When the overflow event ceases, Operations again reaches out to GFL to notify that they can resume pumping. How will GFL continue to abide by this agreement if there is no leachate storage as part of the Leachate Treatment System design.

7. Leachate Holdback Agreement and Contingency Planning:

The City notes that the GFL site operates under a Leachate Holdback Agreement with the City of Hamilton. GFL is required to develop, implement, and maintain a contingency plan that ensures the facility has the capacity to fully contain and temporarily hold all process discharge during wet weather events or any period when the City's wastewater treatment system is in bypass or otherwise unable to receive flow. Failure to maintain such a plan may be considered non-compliance with the conditions of the Agreement.

Effluent Quality

8. Compliance with Sewer Use Bylaw:

The discharge from the facility must meet the limits established under the City of Hamilton's Sewer Use Bylaw No. 14-090. There is currently no indication or supporting data demonstrating that GFL will be able to comply with the bylaw limits. GFL shall provide a statement indicating that facility will be able to comply with the City of Hamilton's Sewer Use Bylaw No. 14-090.

9. Based on Appendix 2 the estimated effluent limits will not meet the Sewer Use By-Law for TKN and BOD. Page 63 of the submitted PDF indicates that the "effluent quality is anticipated to be similar" to existing conditions however, Page 92 identifies an

GFL Environmental Inc.**Instrument type: Environmental Compliance Approval (Sewage)****ERO Posting Number 025-1045****Comments from City of Hamilton**

anticipated LTS effluent quality of 380 mg/L BOD, which would require an Overstrength Agreement from the City of Hamilton for BOD. At present, the facility only holds an Overstrength Agreement for TKN. There are also concerns regarding H2S loadings into the sewer at a concentration of 20 mg/L which does not meet the Sewer Use By-Law limit of 1 mg/L).

10. Resolution of Existing Effluent Issues:

The City notes ongoing issues with effluent quality from this facility that are presently in contravention of the Sewer Use Bylaw. These issues must be fully resolved to ensure compliance prior to any new or continued discharge authorization.

11. Sewer Meter Installation Requirement:

The City requires that a sewer meter be installed on the new sewer line discharging to the Upper Centennial trunk sewer. This meter is necessary to accurately calculate the applicable surcharge in accordance with City requirements.

12. Sewer Access Manhole for Sampling:

The City requires the installation of a sewer access manhole on the sewer line discharging to the Upper Centennial trunk sewer. This access point needs to be accessible 24/7/365 as it will be used by City staff to conduct routine sampling and compliance verification.

13. Dedicated sanitary Line Connection from Potable Source:

If possible, facility may need to look into installing a separate sewer line for the potable water discharge downstream of the surcharge meter to ensure accurate surcharge calculation, unless otherwise approved in writing by the City of Hamilton.

14. Stormwater Discharge Requirements:

Any discharge to the storm sewer must meet the most stringent applicable criteria among the following:

- a. Provincial Water Quality Objectives (PWQOs),
- b. Effluent limits set under the Environmental Compliance Approval (ECA) issued to the City of Hamilton for outfalls, and
- c. City of Hamilton Sewer Use Bylaw limits for stormwater.

15. Stormwater Pond Maintenance:

The on-site stormwater pond should be dredged and maintained to remove legacy sediments or contaminants that may hinder future compliance with discharge quality requirements. The current ERO Posting does not include a maintenance plan for the stormwater pond.

16. Controlled Discharge Conditions:

The stormwater pond should remain in a normally closed position and only discharge to the storm sewer when all applicable PWQO parameters are met, not solely the five parameters listed in Table 3 (page 41). If the Ministry of the Environment, Conservation and Parks (MECP) intends to permit broader discharge conditions, the City requests that the Ministry provide written assurance releasing the City of Hamilton from any liability

GFL Environmental Inc.

Instrument type: Environmental Compliance Approval (Sewage)

ERO Posting Number 025-1045

Comments from City of Hamilton

related to impacts of the discharge to the City's storm system. The City of Hamilton requires that sample results from the storm pond be submitted to the City on a monthly basis.

17. Storm Outlet Security:

The City requests clarification on whether a locking mechanism or controlled valve system installed on the storm outlet will be fully sealed to ensure that discharge only occurs when water quality parameters are within compliance limits.

Groundwater Comments

18. The applicant has provided a draft amended Environmental Compliance Approval (ECA) for the leachate treatment system through the Planning application process, and we note that a corresponding amendment application has also been posted on the Environmental Registry of Ontario (ERO). The submitted Hydrogeological Reports (dated 2019 and 2025) associated with the submission have been reviewed as part of previous planning application submissions.

The site has a Permit to Take Water (PTTW) to account for the groundwater being pumped for remediation purposes. The permitted groundwater taking rate, subject to renewal, is 9,908,000 m³/day. Table 4.4 of the Functional Servicing Report appears to include groundwater as part of the wastewater flow rates generated on site. We would appreciate clarification on two points:

- Does the wastewater flow referenced in the FSR report include the groundwater taking permitted under the PTTW, or is the groundwater extraction considered separate from the reported wastewater flow?
- Is the full volume of groundwater permitted under the PTTW intended to be discharged into the municipal sanitary sewer system?

19. The PTTW was up for renewal in October 2025 and Hamilton Water reviewed the water taking information provided by the MECP and provided comments accordingly. In response to Hamilton Water's comments, the MECP confirmed the potential for impacts to nearby private wells and natural features is low, with no significant groundwater receptors or surface water features within the zone of influence, and there were no reports of well interference complaints during the term of the previous permit. Based on the MECP's confirmation and the supporting technical information, we have no further hydrogeological concerns with the proposed works or the associated water taking.