Projet d'établissement d'un lieu d'enfouissement technique à Danford Lake dans la municipalité d'Alleyn-et-Cawood

BAPE Brief submitted by:

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A Brief History of Pontiac Environmental Protection (PEP)

Pontiac Environment Protection (or PEP) has been Pontiac's environmental watch-dog since the mid 1970s. PEP has conceived and implemented projects in support of eco-tourism, local waste disposal methods, composting, alternative power, waste reduction, re-using and recycling. We supported the citizens of Bristol in their successful efforts to keep a landfill site out of their municipality.

Currently PEP has a seat on the "Table de concertation pour la gestion intégrée des ressources des aires communes 71-21 et 71-04" ("Integrated Resources Management Discussion Table for Forest management units 71-21 & 71-04") This committee is a forum for discussion about the management of natural resources on public land. PEP also occupies the seat speaking for the environment on the "Comité consultatif multiressources"("Multiresource Advisory Committee")of MRC Pontiac. By participating in these monthly meetings we strive to preserve the natural beauty and ecological health of the Pontiac in order to share it with tourists and with future generations. The chance to experience this natural beauty is the main attraction for Pontiac's eco-tourism future."

Today, PEP is still committed to the 3 R's: reduce our consumption of goods, re-use, and recycle. We also continue to promote policies and actions that take care of our precious natural resources- water, forests, and air. The protection of these resources IS our future. The wonderful thing is that we can make use of our resources AND protect them at the same time. We can do this by continuing to perceive and promote our incredibly beautiful region as a destination for tourists and particularly for the fast growing area of eco-tourism. Eco-tourists expect to see unpolluted rivers and lakes, they expect sweet smelling fresh air, and lots of trees

Those of you who have traveled extensively may have noticed that Canada still has some of the most natural landscape still left on this planet. Over time our wilderness will only become more and more valuable, particularly here in the Pontiac, due to our proximity to large urban areas such as Ottawa, Gatineau, and Montreal. Travelers from all over the world come to this area as a destination for longer vacations.

Eco-Tourism

The Quebec Canoe and Kayak Association fully understands the value of this region as a haven for canoeists and kayakers and have expressed their opposition to the Dandford landfill site. Pierre Trudel, President of the Federation, says:

"The Danford Lake proposed landfill site will undoubtedly have a negative effect on the banks of the Picanoc river that are relatively well preserved. The Federation also fears that such a project will harm the notoriety of the entire Outaouais area as a paradise for canoeists and kayak enthusiasts alike in a region that is an important destination for amateurs of such sports, an area that hosts one of the most important white water festival in North America, the FESTIVAL DE L'EAU VIVE DE LA HAUTE GATINEAU sponsored by the FCQK and Action Plein Air."

The following quote expresses the concerns of Jim Coffey, Director of Esprit Rafting, a world wide tourist destination, located in Davidson:

"The Pontiac is building a reputation as one of the world's great eco-adventure tourism destinations. With the recent demise of our timber industry it is obvious that adventure tourism will rise from the ashes. Projects that detract from our eco-adventure tourism reputation seem short sighted, and to be direct, wrong. The slogan of "Pontiac.... home of the mega dump" just doesn't have the same impact as Pontiac..... home of 2500 lakes, 5 major rivers.... .

As a leading tourism operator I feel that combined with the negative environmental impact the dump presents a serious economic blow to our adventure tourism operations, reputation and potential. Our regions regional plan for the year 2020 puts considerable emphasis on aiding and supporting the growth of eco-adventure tourism. The dump proposal for Danford Lake contradicts our regions current tourism direction."

The Problems

The Picanoc is a clean river that naturalists, canoeists, (including Pierre Trudeau), cottagers, hunters, and fisher people have used and enjoyed for over a hundred years. The Picanoc and the Kazabazua rivers both flow directly through local towns and eventually into the Gatineau River. If pollutants from the proposed landfill were to seep into this waterway, thousands of residents and the tourism industry itself would be profoundly affected. The degree to which we would be affected is not clear to anyone, scientists included. What can pollute our water? There is still so much we don't know.

What we do know for a fact is the liners in landfills leak. Michel Bourret, a hydrology specialist with the Ministry of Environment knows this, Yves Gagnon, an engineer, speaking for LDC knows this, and The American Society of Civil Engineers knows this. They all know that untreated leachate, a highly toxic mixture of chemicals, will leak through the liners and into the ground water. Although, there is agreement that liners will leak, there are huge discrepancies between these experts regarding the amount

of leachate that is going to seep into our water. We can monitor this leakage, but the risk is huge and the consequences may turn out to be just as huge because there is still so much we don't know about what pollutes our water. So much we just don't know.

We do know that there will be a leachate treatment system and this treated leachate will be released directly into the Picanoc River. We are deeply concerned that in time this treatment may prove to be ineffective as we discover more about which chemicals pollute water. The Geological Society of America reports that there are elevated arsenic levels in groundwater at landfill sites in Massachusetts. http://gsa.confex.com/gsa/2003NE/finalprogram/abstract_51471.htm. The arsenic may or may not have been an obvious component of the disposed waste material within the landfill." This means that it's possible the arsenic formed as a result of some of the other chemicals mixing together. There is so much we don't know.

A study done by Texas A&M University reports that in a typical municipal landfill leachate, 32 chemicals cause cancer, 13 cause birth defects and 22 cause genetic damage. Given the fact that all liners ultimately leak, this means that over time any leachate which is not collected for treatment will leak through the liners, reaching the water table a few metres below. Let's make the choice about waste disposal that we are proud to tell our children and grandchildren.

The proposed site is designed to accept up to 250,000 tons of many types of waste per year with a minimum operational life of 30 years. In the 30 years that the site is operational, accidents and equipment or human failures are inevitable. One accident, one human slip up, one machine or computer that isn't running just perfectly can poison the river for many years.

Water is one thread, among many interconnected threads, that all together make up our ecosystem. If we follow the thread of poison water we can see that poisoned water leads to poison fish which then leads to poisoned people. There are many other threads in our ecosystem that I haven't mentioned that are also connected to water. This proposed landfill can have devastating effects on our ground and surface waters.

There are many wells, but only one water. What happens to the water here in the area of this landfill effects the water in many other areas. Let's not live in a region where there is "Water, water everywhere, but not a drop to drink." We must take seriously our duty and responsibility to keep our water safe and healthy.

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Here's what Environment Canada has to say (an article at www.nwr.ca/threatsull/ch12-2-e.html) regarding water quality problems and the associated risks.

"The legacy of solid waste management in Canada has left a complex series of water quality problems, many of which we are just beginning to understand. The problems are not entirely due to poor management practices of the past, but are due to the evolving nature of the problem which causes us to look for new contaminants and institute new disposal practices. Many of the contaminants of the future currently exist, and perhaps have existed in water for years, we just have not begun to look for them yet

(e.g.,emerging POPs, pharmaceutical compounds). The contaminants which we currently know about, will also continue to cause major problems and numerous challenges.

Predicting the significance of these contaminant releases on the long-term health of the aquatic environment, developing methods to minimize these future impacts, and formulating an effective regulatory framework that ensures effective management, represent the most immediate tasks at hand."

When Environment Canada says that a risk to the aquatic environment exists, even risks from very small amounts of contaminants we aren't yet even testing for, this is serious. This is still so much we just don't know.

The Solutions

We all produce garbage and we have to find a way to dispose of it. The first sensible thing we can and MUST do is to REDUCE the amount of waste going to final disposal. Each individual has that responsibility. There are small daily actions that we can do right now that have an effect – compost household kitchen waste, bring your own bags to the grocery store, take action against over-packaging, fix things instead of throwing them out, organize a "Give Away Free Day" in your community as they are doing in Ottawa. This promotes reusing as well as reducing what goes to final disposal and what gets purchased new. There are many, many small things that are easy for us to incorporate into our lifestyle that will reduce waste. PEP would be happy to offer individuals and groups ideas and support for making sustainable lifestyle changes.

We can no longer mistreat our earth. We must take actions that show respect and reverence for our water, air, and forests. What goes around, comes around. If Earth is to sustain us, we must sustain the Earth. Humans, too, are part of the interconnected ecosystem. The proposed landfill is not **sustainable technology. There are better solutions to our waste disposal problems. The consequences from a landfill 22 stories high of garbage could be devastating. How will we explain this to our children and grandchildren**?

It is becoming increasingly obvious that 20th-century waste disposal technologies are simply not in alignment with the need for environmentally responsible waste disposal in the 21st century. Times have changed and new technologies are now available. Plasma gasification offers immediate waste reduction to 10-15% of what is currently land-filled, and it has the potential to achieve nearly 100% diversion. In addition, this technology provides a cost-effective method of converting residual waste into a clean alternative energy source. This is the sort of environmentally responsible investment needed in order that Danford Lake and all of Pontiac can continue to develop tourism potential rather than be marginalized as a dumping ground for city wastes. Spending inordinate amounts of money on outdated, environmentally-questionable projects is money wasted.

As an alternative to the engineered landfill, we propose following the lead of Ottawa. They plan to install a plasma gasification facility on a small scale and will ultimately treat all its residual waste this way. Ottawa also plans to initiate a composting

program in the very near future. We can learn from their experiences how to apply it to our local needs. Gas plasma technology has been used to treat waste for about thirty years in Europe where space is limited. We should treat our space with respect and not waste it on garbage.

In plasma gasification technology, a high temperature electric arc is formed in a reactor vessel that is starved of oxygen, so burning or incineration is not present and fumes from burning do not occur. Metals melt and flow out and are solidified and taken away for re-use. The other solid materials are turned into a glassy material that can be used in concrete and asphalt. There is minimal landfill resulting from this treatment and what there is, is stable so that there is no possibility of water picking up harmful materials and carrying leachate into our water table and into our beautiful rivers. The gases given off are not harmful and the energy they produce can be used to generate electricity.

Research has been done and documented by Dr. Raye E. Thomas, who has a PhD. in Electrical Engineering. His specific expertise is in the field of semiconductor and solar cell manufacturing technology, water purification and industrial wastewater treatment. His experience includes 15 years as a professor at Carleton University and wide international experience is providing manufacturing technology and energy solutions.

As plasma gasification has already proved itself to be an excellent solution to our waste problems, as there are qualified people who can be consulted, and as both the technology and the experts are as close as Ottawa, why are we considering outdated technology that is guaranteed to cause us problems of mountainous proportions?

Public Participation in RMMP of MRC Pontiac:

<u>This is a summary of our concerns, which are elaborated and substantiated in the rest of our brief</u>:

PEP has serious concerns regarding the adequacy of the public consultation process, required by law, at the municipality and MRC level, which must take place before a working RMMP is adopted, and certainly before a BAPE consultation. Some sort of forum on planning occurred in 2002, concerning mostly recycling and composting, and sharing trench landfills on a temporary basis, but this was not the consultation an RMMP called for by the Québec Policy, and no report on it is included. The RMMP was adopted by the MRC council in March of 2003. A public consultation, arranged by an MRC commission, was held in May of 2003, <u>after</u> the RMMP had been officially adopted.

As well, when it was proposed to put a particular type of project (this engineered landfill), of a particular size, in a particular place (beside the Picanoc River in Alleyn-and-Cawood Municipality), the rate-payers of that municipality and the MRC were not properly consulted, and in fact in October of 2004, they were informed that a new landfill would be built just for that municipality. After the residents realised that a landfill for l'Outaouais was planned, they were told that a referendum on the landfill would be held, a promise which the municipality had no intention of honouring. When

the MRC then in 2006 took over responsibility for the landfill from the municipality, it again refused to consult the residents, again ignoring the requirement of the Policy.

In October of 2005, an addendum to the RMMP was made by resolution of MRC Pontiac council, revising management scenarios for recyclable waste, for organic materials, for recycling textiles, and for inventorying sludge and assessing whether it could be reclaimed. At the end of the addendum is a half- page amendment to the RMMP, declaring that the City of Gatineau and all of l'Outaouais could dump or incinerate residual materials in Pontiac MRC. There was no public consultation on this amendments.

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In January, 2001, the MRC Pontiac was given the responsibility of writing an acceptable residual materials management plan (RMMP) by the end of 2002. PEP understood this to mean that preparation and approval of the RMMP was to be done before any particular major project would undergo a BAPE hearing.

The RMMP plan is supposed to involve the public and be subject to a public consultation before it is approved by the MRC. The Québec 1998-2008 Residual Material Management Policy says:

2-Principles
.....
Citizen participation
Citizen participation in the development and monitoring of measures targeting ecologically sound waste management is essential to achieving our goals. The general public must have access to relevant information and to the appropriate forums during the decision-making process.
.....
5.2 Citizen participation

Regional municipalities are required to establish adequate mechanisms to foster public participation early in the development and monitoring stages.

A public consultation on the proposed plan must be held via a commission set up by the regional municipal council and consisting of no more than ten members appointed by the council, with at least one business representative, one union representative, one community representative and one environmental protection group representative.

The commission must hold a public meeting in at least two local municipalities located in the territory of the regional municipality concerned. It is responsible for defining its modes of operation and consultation and must report to the public and the Minister.

PEP ordered a printed copy of the RMMP from the MRC in August of 2005, for $35.00, since it was not available in electronic form, and we received this in October, 2005, along with an addendum to the RMMP that had been adopted September 26, 2005. The RMMP and the amendment were prepared by Groupe-conseil Roche Ltée of Sainte-Foy, which is a company Québec civil engineering consulting company. The original RMMP was adopted by the MRC March 24, 2003, as resolution 2003-087. The RMMP states:

> "(p. 2) The RMMP will be fully and exclusively applicable to the territory of the MRC of Pontiac. It will not be shared by any municipality located beyond its limits."

But this RMMP adopted March 24, 2003 also stated,

> "... (p. 78) In the midterm, the MRC will need to study the feasibility to convey its residual materials to a technical landfill site located in a nearby MRC (100 km to the maximum). The MRC will also need to study the feasibility to establish and operate a technical landfill site on its territory. This could be used exclusively by the residents of the MRC or be shared with one or several neighbouring MRCs or neighbouring municipalities."

So the RMMP contradicted itself.

In May of 2003, two months <u>after</u> they had adopted the RMMP, the MRC held a public consultation of the sort required by the Québec Policy. A commission was appointed by the MRC to supervise a public consultation. The commission was composed of eight gentlemen (three mayors, from Campbell's Bay, Litchfield, and l'Isle des Allumettes, two businessmen, two socioeconomic representatives) and Nicole Desroches of CREDDO (Conseil pour l'environnement et developpement durable de l'Outaouais), in Gatineau. PEP was not invited to sit on the commission. These persons presumably met and appointed two representatives of the MRC (Pierre Duchesne, planner, and Suzanne Dupuis, MRC forester 2003 - 2004), as well as two representatives of Roche, to present the plan to the public at two meetings, in Shawville and in Waltham, on May 28 and May 29 at 7 p.m. A report of these two meetings is supposed to be in Appendix 3 of the RMMP prepared by Roche, but the copy we received in October, 2005 had nothing in Appendix 3. The RMMP report also states (p. 15) that a public hearing session was held in January, 2002, at an undisclosed location, but there was also no copy of a report on this in Appendix 3 of the RMMP. (The RMMP report was written and presented by Roche in September of 2003.)

However, on p. 23 of the RMMP report, it states that several MRC inhabitants mentioned at a consultation session that illegal disposal sites are present in certain areas. On page 56 of the report, is a statement that seven orientations were determined by the population (presumably at a session facilitated by Roche in 2002):

1. **Promote source reduction and reuse of household residual materials;**
2. **Promote the recovery and recycling of recyclable materials;**
3. **Encourage and ease composting of organic materials;**
4. **Promote the recovery of hazardous household waste;**
5. **Promote and ease the collection of municipal bulky waste, used tires and construction and demolition waste;**

6. **"Strengthen the current practices of waste disposal";**
7. **Conduct an inventory of municipal sludge and verify the conformity of the current septic installations.**

Although PEP was not specifically consulted, these points reflect the concerns of several PEP members. Point 6 was extremely vague, however.

On September 26, 2005, the Pontiac MRC passed an amendment to its RMMP (resolution 2005-284), which they said replaced section 5.2.6.3 of the original RMMP. The numbering of sections is out of order in the RMMP, and it is hard to find section 5.2.6.3. Section 5.3.6.2 says:

> "Potential Management Options. One of the possible short-term solutions for these municipalities [whose trench landfills will be full in less than 5 years] would be to establish inter-municipal agreements, which would allow the re-routing of waste from these municipalities to the in-trench disposal sites of nearby municipalities. Such agreements, however, must respect all governmental requirements or be specially authorized by the Québec Ministry of the Environment.
>
> In the midterm, in the eventuality that the draft Regulation respecting the elimination of residual materials is adopted, the establishment of a technical landfill site near the MRC of Pontiac (e.g. in the MRC of Collines-de-l'Outaouais) will oblige all municipalities located less than 100 km from this site to stop using their in-trench disposal site and forward their waste to the technical landfill site."

Then the numbering jumps to 5.2.6.3, *Recommended option*, and suggests that municipalities whose trench landfills will be full in less than 5 years could use the trench landfill of a neighbouring municipality.... it then says,

> "In the midterm, the MRC will need to study the feasibility to convey its residual materials to a technical landfill site located in a nearby MRC (100 km to the maximum). The MRC will also need to study the feasibility to establish and operate a technical landfill site on its territory. This could be used exclusively by the residents of the MRC or be shared with one or several neighbouring MRCs or neighbouring municipalities."

The amendment of Sept. 26, 2005 quotes the above two sentences from the original RMMP, and says that they will be <u>replaced</u> with:

> "The Regional county Municipality of Pontiac will not prohibit the dumping or incineration in its territory of residual materials from outside the territory, which can be disposed of at a future technical landfill site that could eventually be planned in the MRC's territory. These residual materials would have to come from the four (4) regional county municipalities (MRC) in the Outaouais region and, possibly, from the City of Gatineau. The other regional county municipalities adjacent to the MRC of Pontiac could also dispose of their residual materials at the technical landfill site, within the limits of the capacity authorized in the decree of the Québec Government."

There was no public consultation on this 2005 change to the RMMP, clearly violating the directives in the Québec 1998-2008 Residual Material Management Policy. There was also no public consultation on the original RMMP, since it was held after the MRC had approved it.

Another serious problem appeared on the municipal level, in Alleyn-and-Cawood. In a letter to rate-payers of in October of 2004, the administration proposed to construct a new engineered landfill to replace the trench landfill. The residents of Alleyn-and-Cawood were misled by that letter to believe a new landfill would be built just for that municipality, when in fact it was to be a landfill for all of l'Outaouais, for 7 ½ million tons, to be located beside the Picanoc River. The rate-payers were then further misled by promises from the mayor and the promoter that the project would not go ahead without a referendum in the municipality. This referendum never materialised.

At the same time, the promoter of the landfill has purposely misled Alleyn-and-Cawood residents by leading them to believe that they make up the membership of a legitimate landfill "watchdog" committee, when he knows perfectly well that a legitimate oversight committee is composed mostly of residents coming from the whole region, who possess a variety of skills necessary to monitor its proper operation. Furthermore, such a committee is not set up before a project is approved. To manipulate local long-time residents in such a way is callous and cruel.

Anther document of interest is the Land Development Plan (Chemin d'aménagement) of the Pontiac MRC, adopted n 1999. It states (p. 104)

> "The Council of the MRC of Pontiac is conscious of the challenges related to residual materials management. However, it considers premature to adopt any orientation without knowing what will happen to the recommendations obtained in the BAPE's report as regards this subject.
>
> However, taking into account the problems and considering that it is up to the municipal world to plan the organization and the use of the territory, the MRC Council has recently mandated its Planning Department to work to locate those parts of the territory susceptible to support waste disposal operations such as sanitary landfill."

This statement in its land use plan demonstrates that in 1999 the MRC and the planner it had hired believed (1) that they did not have to adopt an orientation (i.e. create a plan for waste management) until after a report was obtained from BAPE, and (2) that the MRC council already believed that an engineered landfill should be located on a part if its territory. Between 1999 and 2006, the MRC council and administration were only concerned with where it would be located.