

H. Kreplin, West Burlington Citizens Group

Mar. 25 '84

COMMENTS, Phase 2, Stage 2C Work Program

by Walker Wright Young Assoc. Ltd., February 1984

A. Questionnaire, Mar. 20 '84 public meeting at RBG, Beerlington

The form is not used here as it is too narrow in scope and is misleading in the subjects suggested for comment:

(1) I object to making no distinction between the reports 2B, Selection of Candidate Sites, and 2C, Work Program.

(2) I object to diverting attention to the question of priorities of categories ("factors" here) that was established already at an earlier stage.

(3) I object to the failure to ask for opinions on the work program process.

Obviously, the public input is sidetracked by this.

B. Draft Phase 2 Stage 2C Work Program, by item.

1.0, Objective & 2.0, General Approach:

You have misplaced the Social Impact Assessment, stating only that your objective is to draw on local opinion while your general approach drops the subject from the enumeration of subjects.

This is more than an oversight (see following comments on this item): The Social Impact is seen merely as a Public Relations exercise, and that is objectionable.

- Cultural Impact mentions only archaeological and heritage concerns, ignoring present and future culture (more on this below). Previous comment on this has been ignored. ^{Likelihood of present cultural concerns}

3.0 Evaluation Factors:

- Lists the six categories but fails to list the priorities established at an earlier stage (and the questionnaire re-opens the ranking subject). I object to either shifting or dropping this basis for assessment at this late stage. ^{Good how will priorities be weighed?}
- Apply weight numbers (numerical factors) to the assessments as per priority category to make the priorities meaningful in the end result; otherwise the priorities remain only glib statements without consequence. You say "the intent of the evaluation factors applied in Stage 2B does not change". However, the level of detail... would... be intensified... and you should live up to that.

4.1 Hydrogeological Analysis:

- The data for the NSP candidate site must include
 - (a) recent reports from Dr. Cherry re. leachate migration out of the Bayview site (1983);
 - (b) April 1981 monitoring report, Burlington landfill site, by Gortner Lee Assoc. Ltd. re. leachate plume (Fig. 3 and Fig. 13)Both are highly relevant information that cannot be ignored before recommending any preferred site(s).
- Geologic data should include gas permeability in addition to hydrogeology, and the derived consequences.

4.1.2, Activities, & 4.1.3, Engineering / Operations

Offsite constraints (4.1.3) must be identified and considered before making a "preferred site(s)" recommendation, not afterwards as part of drafting a conceptual plan for operations. Otherwise your selection would be blind to the impacts, and impacts are largely off-site in nature. Your "walkover" etc. must range a good deal farther than the site itself, especially into areas of lower elevation:

At P&Q#1 (Stage 2B), even the "Study Area" outlined in Map # 11 is grossly inadequate as it does not include any buffer zone to the South of the site which happens to be downhill of it: It is simply cut off!

Such an approach is not only incorrect but so arbitrary as to exclude primary facts from the assessment.

The close proximity of a residential area demands an extended range of study, in this case in more than one direction. I object to the deliberate elimination of important impacts, a fact that is illustrated clearly in Map # 11 of the Stage 2B report.

Again, these impacts must all be considered before, not after, the choice of a preferred site.

5.1, Biophysical Analysis:

- The human species may not enter into the "Natural Environment" factors, but the listed characteristics must be applied at least as much under "Social" and "Cultural" headings, or else humans must be included here. Your approach is highly inconsistent in this respect.

- The range of "study area" or "buffer zone" requires adjusting to the subject matter: Biophysical effects are largely above ground, involving mechanisms that are totally different from the hydrological effects below ground.

6.1, Social Analysis:

- People, and the impacts they suffer, are not considered in the biophysical analysis, but neither are they here: You specifically "will not include such considerations as noise, dust, litter, odour and concerns about water supply." [add: traffic etc.] "These issues would be addressed... through workshops and/or Public Open Houses..." You cannot simply deny that these issues have social impacts. They spell out "quality of life", and the facts are:
 - (1) our society is greatly concerned about the quality of life;
 - (2) living under the spillover effects of a dump is worse, in the social context, than living "on the other side of the tracks";
 - (3) the central purpose of the EA process is to minimize impacts on the environment - people's environment, and on people, directly or indirectly.Your concept of social impact clearly ignores these basic facts.
- Specifically, you propose to leave the assessment of social impacts entirely to public input. Surely, you must take the responsibility of identifying and assessing social impact factors yourself, as is done in other categories. Public input is necessary, but not as the only source.
- You do not address buffer zones for social impact, nor a study area. The effects of landfill extend at least 2 km

from a site. Here again, the range of investigation must suit the subject and the mechanisms involved.

- The factors Noise, Dust, Litter, Odour, Water Quality, ~~and~~ Traffic and Visibility clearly belong here, if nowhere else. Leaving it to the population to raise these issues is a cop-out.

- In Figure ONE, the Summary Report is to circulate for comments, but then that goes nowhere. This heightens the concern that "Social Environment" is meant to be no more than a public relations effort and of no real consequence.

The "very tight schedule" (p.1) adds the concern that time will run out before public input can run its course raising issues and having them assessed properly.

7., Cultural Environment:

- The archaeological and heritage ^{items} are only a small element of culture and deal only with the history aspect. Present and future culture are ignored.
- Landfill definitely has an impact on the style of our lives, or how refined we live (emphasis on value systems, aesthetics and taste). That includes the natural environment (what is left of it), vistas, landscaping, architecture and simply freedom from nuisances.
Typically, real estate choices depend on (1) location, (2) location and (3) location once more; This goes far beyond land values and compensation for losses. It invades people's

lives more than physically: It invades their identities, now and in the future, leaving a culturally blighted area around a landfill operation: Imagine appreciating music over the roar of a bulldozer (annoying sound swell).

- Here, too, an appropriate study area must be used.
- Factors must be identified and quantified to add the aspects of present and future impacts on culture (e.g. in classifying the types of or styles of properties in the area, from "prestige" to "cleftop").
- Note that this category ranks higher in priority than costs, engineering and operation of the landfill.

8. Costs

- The intention to count all costs of landfill is commendable, and to convert all to a cash flow basis. Since the waste quantities are also to be updated, the total cost per tonne (ton ?) can and should be stated as well.
- The possibility of a private landfill operation must be considered inherently more dangerous to public health and safety than that by a public body, requiring additional supervision and control. That, plus the profit margin, will make the cost of private operations greater; state the added cost, if you seriously consider that option.

9. Engineering and Operations:

- This section does not include the conceptual operating plan proposed in 4.1.3, which belongs here.
Transport questions are surely not the only issue:
- Review the site capacities under the applicable restraints:
 - (1) Setbacks from sensitive impact features (disregarded in Phase 2B report re. P. & Q. #1)
 - (2) Height limitations set out in Appendix G of the Phase 2B report. This will severely reduce capacities of sloped sites, incl. P. & Q. #1 (note the relation between elevation differences and leachate pressures which were found to burst the cover envelope).
- Consider the need for an on-site transfer station for the purposes of
 - (1) inspection and control of what materials are landfilled;
 - (2) separation of materials for EFW incineration or direct recycling.

Note that haulers may well find it more convenient not to go to an EFW plant, particularly if the load contains "contraband" material. Once it is dumped at the "working face", it is too late to control it.

If this item is included, it should also be entered under "Costs", item 8.

C. Conclusions

The proposed Work Program, Stage 2C is full of serious flaws, as shown by the foregoing comments. It requires extensive upgrading in almost all of its categories. Otherwise it can not be taken seriously as a fairminded assessment leading to a valid recommendation for a preferred site.

Particularly disturbing is the shallow treatment and/or the deflection to irrelevant status of the very issues of impacts on people. The human population is surely part of the environment in question, especially in heavily populated areas, but this draft appears to set out deliberately to ignore that fact.

Hans Kreplin