

# PETITION AGAINST PROPOSED CORONATION DRIVE WASTE PROCESSING PLANT

Typical Biosolid Heavy Truck



Typical Wet Organic Waste Heavy Truck



[steve woods](#) started this petition to Ministry of the Environment and 2 others

Prevent environmental damage to our neighbourhood from >200 heavy trucks per day transporting waste in and out of West Hill 24/7/365, resulting in the production of significant noxious gas emissions and raising neighbourhood noise/safety concerns.

## Clarification:

The project will not release significant noxious gases into the atmosphere, and not pose a safety issue to the neighbourhood

An Emissions Summary and Dispersion Modelling Report which models the impact of site emissions to the air within a 4.8 square km area of the facility was conducted. This Report has been submitted to the Ministry of Environment Conservation and Parks (MECP) for review.

An Odour Assessment was conducted to determine if the facility design will meet odour requirements that are set by the MECP. The results from the dispersion model indicate that the rigorous odour control mechanisms that are in place will protect the community from odour issues.

An assessment of the impact of noise from the facility was submitted to the MECP and a full Acoustic Assessment Report is currently underway.

In addition, a Traffic Impact Study is currently being done to assess the impact of truck traffic that this project will have on the community. The number of trucks and the types of trucks as well as the routes they will take will be reviewed and recommendations will be made on the best

way for the Facility to move material into and out of the facility to minimize impact on the community. It should be noted that the photographs used in the petition are not representative of the types and cleanliness of the trucks that will be used at the facility. The ECA application that was submitted to the MECP clearly states that all trucks leaving the Facility will be washed inside a closed building that is designed to control and treat odours

### **West Hill, Coronation, Highland Creek, Centennial and West Rouge Neighbours:**

**THE ISSUE:** A proposal by 2683517 Ontario Inc. has been received by the Ontario Ministry of the Environment to develop a private waste processing and transfer plant, with a biogas anaerobic digestion system, at 633 Coronation Drive (just up the street from the sewage treatment plant) on the Lake side of the site.

#### **Clarification:**

The proposed facility is a combination of an organics processing centre and anaerobic digester system. The organics processing centre is used to segregate any infeed that cannot be processed in the anaerobic digesters. **Biogas technology takes places within a fully closed tank that** uses a biological process to produce a combustible gas from the decomposition of organic waste in an anaerobic setting. The gas, known as biogas, contains roughly 60% methane and 40% carbon dioxide and can be converted to provide usable energy: gas, electricity and/or heat. The second product that is produced with biogas technology is a pathogen-free organic fertilizer called "digestate".

**FACT:** If this proposal to process huge amounts of putrescible wastes and truck the wet incoming materials and biosolids by-product out through our neighbourhoods all day and night is approved we are facing a major disruption to the liveability, and safety of our communities

#### **Clarification:**

This application is to process a maximum of 1,240 tons of commercial organic material daily. The product of anaerobic digestion, digestate, is not a biosolid material, it is an odourless organic fertilizer which will be used on farms north of the facility to replace and offset the use of chemical fertilizer products. The third-party traffic study will assess impact to our community.

**FACT:** The proposed operation will involve 20 times as many trucks as the proposal that was turned down by the Biosolids Environmental Assessment (EA) for the Highland Creek Treatment Plant, and includes 2 anaerobic digesters, 11 natural gas boilers, ***one open air storage facility***, and other waste processing and storage facilities.

#### **Clarification**

There will be no open-air storage of any organic wastes at this facility. All of the processes, including reception, pre-treatment and anaerobic digestion, all occur within enclosed buildings or tanks.

The facility is designed with a number of high efficiency, low emission boilers to provide process heat which is required for the process of anaerobic digestion. The heat requirements vary from summer to winter and as such, there are numerous boilers to allow the facility to efficiently heat the system.

**FACT:** The City of Toronto currently collects 150,000 tonnes per year of residential and commercial green-bin organics which are processed at its Dufferin and Disco Road Plants. The Coronation Plant proposes to process up to 900,000 tonnes of wet rotting waste annually – **6 times as much as the entire City of Toronto.**

#### Clarification:

This application is for 1,240 tons of organic tonnage per day and is for a mix of both putrescible and non-putrescible. This represents a maximum of 452,600 tons per year (based on 365 days). These materials are brought to site in closed trucks, delivered into a closed reception building and processed in sealed anaerobic digesters. There is no open storage of material at this facility at any time in the process.

The plant is designed to process organics originating both from Municipal curb side collection, as well as commercial organics, which is not collected by the city of Toronto but will be banned from going into landfills starting 2022.

**FACT:** Both these City owned plants are surrounded by industrial areas with *direct* major road access to 400 series highways without going through residential neighbourhoods, which are at least 700m from the site. The proposed site at 633 Coronation is within 200m of residential homes, within 500m of parks and within 700m of schools. The 6- or 7-kilometre trip to the 401 (depending on the route) by >200 trucks per day would pass hundreds of homes, several schools (primary, and secondary), the University, seniors living facilities, shopping malls, fire/police stations, and community centres.

#### Clarification

The property that is proposed for use for the facility is zoned for heavy industrial use, and waste transfer is an allowed use by the City of Toronto By-Laws. A Traffic Impact Study is being carried out which will examine the impact of this site on local traffic and provide recommendations to minimize the impact of the facility on the neighbouring businesses and residents.

**FACT:** The Proponent is planning to truck in putrescible waste (wet decomposing waste) that may include but not be limited to: rotting food, plant waste, animal waste and human waste, and then after processing on site, ship out the residual biosolids and non-processed materials for land application or dumping. There will be noise from the processing plant operating 24/7/365, from heavy trucks entering and leaving the site, and significant emissions and odours from the plant and the trucks (they are typically the large dump trucks with the tarp covering – ie: open to air)

loaded with putrescible wastes. Not only will the impact be to the immediate area (within a few km of this site) but along the route to the 401 (Beechgrove/Port Union or Manse/Morningside likely) with open top trucks causing excessive noise, odour, vehicle GHG emissions and emissions/odours from rotting wet cargo. The current number of trucks using either Beechgrove or Manse to get to 401 from Coronation Dr daily is less than 100, ***this proposal will at least triple the amount of trucks using these routes.***

#### Clarification

The application is for putrescible and non-putrescible waste. It should be clarified the proponent has not requested permission to treat animal and human waste. There will be no treatment of animal and human waste at this facility. The anaerobic digester system is designed to meet MECP pasteurization requirements for processing source separated organics (SSO) material from curb side green-bin programs is brought to the facility. The City of Toronto allows disposable diapers to be placed in green-bins and as such the only human waste that could enter the facility would be through this avenue. If this type of material is accepted, all of the material that is processed through the anaerobic digesters will be pasteurized to MECP specifications.

All receiving, processing and truck unloading will be done inside the organics processing centre building which is designed to ensure complete air treatment of all air in the building. Full details of the design and operation of the facility can be found in the Design and Operation Report on the MECP website. A traffic study is currently being done to address the impact of this project on the community. The number of trucks and the types of trucks as well as the routes they will take will be reviewed and the impact of these trucks on air quality, noise and safety will be addressed in this third-party review and report.

**FACT:** The recently rejected proposal to truck biosolids from the Highland Creek Sewage Treatment Plant (HCTP) involved an estimated 5 heavy trucks per day, 5 days per week. The Coronation proposal is planning 70 heavy trucks incoming with wet putrescible (and likely leaving empty), and 30 heavy trucks leaving with biosolids digester residues (arriving empty). There will also be an unknown number of trucks removing unusable material to local city owned landfill sites. At least 200 heavy trucks (the two pictures above are examples of the type used in other such facilities) arriving or leaving the site every day of the year, 24 hours a day. The estimated greenhouse gases alone from heavy truck emissions will be about ***10,000 tonnes of greenhouse gases (mainly carbon dioxide)*** – this is assuming only an 80km trip per truck (typically from small communities and to farmland), however the proposal states it can ship waste from anywhere in Ontario, and if 6 times the amount of waste from Toronto is expected every year the incoming truck routes will have to reach far beyond the outskirts of GTA, and significantly add to the greenhouse gas emissions.

#### Clarification

The facility will not be processing human biosolids and produces a nutrient, odourless organic fertilizer.

This application is for 1,240 tons of organic tonnage per day. This represents a maximum of 452,600 tons per year (based on 365 days). We estimate the organic residues produced within a 50km radius of the proposed plant to be 5-times (check) the maximum capacity of the plant. Note: There is industrial and commercial organics, which are not handled by the city of Toronto but still need to find alternatives to landfill disposal. The proposed plant will facilitate a circular economy.

The majority of the trucks that come to the site will leave the facility empty. They will be delivering material for treatment; the totes will be power washed, and the trucks will leave. The digestate will be loaded onto specialty truck by secure piping will leave the facility to bring to area farms for storage until they are land applied as an organic fertilizer. Currently trucks pick up organic waste from the GTA and bring them to a variety of areas for processing – either other anaerobic digesters, farms or landfills. The location of this facility will result in less trucking of organic materials around Ontario (and sometimes further) to find “homes” for it and close the nutrient loop, returning valuable nutrients to farmer’s for use on their farms, reducing chemical fertilizer usage. The facility will result in a reduction of greenhouse gas emissions as it will reduce trucking of organic wastes. The process of anaerobic digestion will treat these organic materials and captures the carbon dioxide and methane gas that is released during the decomposition of these materials.

A traffic study is currently being done to address the impact of this project on the community. The number of trucks and the types of trucks as well as the routes they will take will be reviewed. The impact on air quality and noise from these trucks as well as any safety concerns will be addressed in this third-party review and Report

**FACT:** The proposal confirms that 6 gases, which will severely affect the air quality, are to be emitted to the local environment from this processing system, The HCTP EA evaluated over 25 noxious gases; there are concerns that some noxious gases may have been missed in this assessment. A December 2019 emission model released for the proposed plant showed the following emission estimates:

- nitrogen oxides (NOx) - up to 35% of ministry limit
- sulphur dioxide (SO2) - up to 69% of ministry limit
- particulate matter (PM) - up to 21% of ministry limit
- **carbon dioxide (CO2) - up to 301% of ministry limit**
- methane (CH4) - up to 40% of ministry limit
- total reduced sulfur (TRS) - up to 71% of ministry limit

It should also be noted that besides the emissions that far exceed the allowable limit, ***all 6 of these pollutant emission rates are considered 'significant' according to ministry guidelines.***

The above emission rate is based on processing 1240 tonnes of wet waste per day, but a site approval was granted in early 2019 to ***increase importing of up to 2500 tonnes (about double what is being presented for assessment) daily.*** It is unclear if these emission amounts should be

doubled, essentially making many of the acknowledged noxious gases well above the legal limit. The impact from increased trucking, air quality, noise, safety etc are all likely impacted significantly as well.

#### Clarification

The application is for 1,240 tonnes per day. There is no approval for this facility to process up to 2,500 tonnes daily.

The MECP Emissions Summary and Dispersion Model Report Guidelines require a screening to determine if a contaminant needs to be modelled using a dispersion model. If a contaminant is “significant” it simply means that the contaminant is modelled to determine if it will have an impact on-site. As shown above, all of the contaminants being emitted from the facility that were considered significant or modelled with the dispersion model were **below the Ministry Limits for each contaminant.**

The process of anaerobic digestion captures both methane gas and carbon dioxide gas (called biogas) which is naturally emitted when organic material decomposes. This gas would be released to the atmosphere if the organic materials were brought to a landfill that does not have landfill gas capture or brought to other end uses. The biogas that is generated at this facility is not a production of new greenhouse gases. The biogas that is captured is cleaned to separate the methane gas from the carbon dioxide gas – the methane is now able to be used as renewable natural gas, offsetting fossil natural gas. As methane gas is a greenhouse gas that is much more potent than carbon dioxide, this process will significantly reduce greenhouse gas emissions compared to the status quo of treatment.

The Emission Summary and Dispersion Modelling Report is reviewed by an Air Specialist at the MECP to ensure that it adequately models emissions from the facility and meets air quality standards for the Province of Ontario.

**FACT:** In March, a brief notice outlining this huge project was sent to only a few residents immediately adjacent to the project site. However, the significant environmental impacts of this project will be felt by residents all the way to the 401. Because of COVID-19 we have all been self-isolating for the last two months. This has hindered the residents from hearing about, and learning details about this project (a copy of the text of the notice is included at the end of this petition).

#### Clarification

In December 2019 notifications were sent by Registered Mail to businesses and residents within a 300 meter radius of the facility. After submission of the ECA application, the MECP requested that further notification be sent to residents and businesses within a 500 meter radius of the facility. As such, this notification was hand-delivered to over 300 businesses and homes, often

beyond the 500 meter notification request to ensure that all homes or businesses on a street received the notification letter.

In mid-March at the request of City Councillor Jennifer McKelvie, an additional letter regarding the project was compiled as well as an email address that can be used to contact the proponent with questions. A new website will be operational by mid-June that will help to alleviate the information flow. In addition, the website will offer a monthly newsletter as well as a contact page to allow the residents to ask questions. These queries will be answered within 2 business days.

We continue to work with the offices of City of Toronto counsellor McKelvie and MPP Thanigasalam to find additional ways to reach out to the community.