

Attachment 'A'

May 18, 2006

Mr. Andrew Campbell, P.Eng.  
Director, Solid Waste Management Branch  
Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON L3Y 6Z7

Ms. Mirka Januszkiewicz  
Director, Waste Management Services  
Region Municipality of Durham  
605 Rossland Rd. E  
Whitby, ON L1N 6A3

Dear Mr. Campbell,

**Re.: Durham/York Residual Waste Study – Comments on Draft Report on Identification of Preferred Residual Processing System**

Thank you for the opportunity to review and provide comment on your consultants' draft report recommending a preferred residual processing system for York and Durham Region. The following staff comments are being provided to you in advance of our June 27, 2006 Report to Markham Council in order to meet your consultants May 19, 2006 deadline.

**PUBLIC CONSULTATION:**

This is a significant EA document which proposes to introduce a new long-term waste management and residual processing system for York/Durham Region. As the largest municipality in York Region, Markham Council has an interest in waste management issues affecting Markham residents and a comment time frame of 30 days does not provide sufficient time for review and formal comment from a public agency. A minimum time frame of 60 to 90 days should have been allocated for agency comment.

**WASTE DIVERSION:**

Markham staff rated maximum diversion of renewable and non renewable resources out of the waste stream as paramount. The study's recommended diversion targets of 60% by 2011 and 75% by 2045 are too conservative and indicates inadequate planning for projected waste flows in the context of future and potential waste reduction and recycling trends over the study timeframe. In 2004, Markham Council established a target of 70% diversion by 2007. Markham is currently diverting 68% of its waste from landfill. We anticipate exceeding our 70% diversion target and moving toward 'Zero Waste' by 2010. Input from recent Focus Group discussions conducted in Markham indicated that residents are proud of their achievements and are willing to 'reduce, reuse and recycle' even more if provided the tools and opportunity.

The study's waste diversion target does not adequately account for diversion opportunities for waste from non residential sources. The study emphasizes residential at source diversion and

Option 2(a) is the lowest ranked option as it does not include the recovery of recyclables or organics prior to processing. This option appears to rank energy recovery from the incineration of non renewable resources higher than recycling and reuse. Input from the public consultation process ranked environmental considerations as the most important study priority.

Environmental considerations must rank source reduction or diversion of non renewable resources through reuse or recycling as a priority over energy recovery. Energy produced from the burning of renewable and non-renewable materials is inefficient and ultimately a waste of energy.

Options 2a, 2b and 2c may require fixed minimum tonnage thresholds. Such thresholds often result in "Put or Pay" requirements that work against current and future reduction and diversion efforts.

In addition, the study fails to provide a balanced analysis of the role of landfill as it relates to the outputs of all four options. The landfill crisis in Ontario is about the limited disposal options for unprocessed municipal solid waste and is impacted by historical jurisdictional limitations. The outputs from all four processing options may not be classified as municipal solid waste and could be suitable for acceptance into privately owned and operated landfills. Ontario has abundant long-term licensed capacity for processed solid non hazardous waste, bottom ash and fly ash. The Study must re-evaluate the role of waste outputs as they relate to landfill impact.

### **ADDITIONAL CONSIDERATIONS:**

The EA Study should also address the following socio-economic and environmental criteria:

- Air emissions/smog – contribution to SO<sub>2</sub>, NO<sub>x</sub>, VOCs
- Compatibility with Kyoto requirements – CO<sub>2</sub> reductions
- Effects on terrestrial environment – species at risk and habitat
- Effects on aquatic environment – fish and fish habitat
- Effects on heritage and cultural resources – heritage districts
- Effects on natural resource production – agriculture, aggregate
- Use of non-renewable resources – fuel concrete, steel
- Compatibility with existing development – displacement, opportunity for expansion, adjacent land uses
- Compatibility with Municipal Policies and Plans – supports municipal planning and development objectives

As a municipality with a progressive waste management program, Markham Council has an interest in waste management issues and will be providing a response to the technology being recommended.

Notwithstanding the May 19<sup>th</sup> deadline that was provided for public comment, the Town of Markham reserves the right to submit its formal comment at its earliest convenience. The comments contained within this correspondence represent staff's view and have not been reviewed by Markham Council. Given the quantity of information identified within the draft EA

PASSED

Attachment 'B'

**Draft Resolution for May 30<sup>th</sup>, 2006  
Durham/York Residual Waste Study  
Joint Waste Management Group**

**Be it therefore resolved that the Durham/York Residual Waste Study Joint Waste Management Group recommends:**

1. That the respective Councils for the Region of Durham and York Region APPROVE of the recommended preferred residuals processing system set out in the Report on the Evaluation of "Alternatives To" and Identification of the Preferred Residuals Processing System, summarised as follows:
  - a. The preferred system to manage the post-diversion or residual wastes is *System 2a) – Thermal Treatment of MSW and Recovery of Energy followed by the Recovery of Materials from the Ash/Char.*
  - b. Because new technologies may offer additional benefits an alternative for further consideration in the upcoming competitive process is *System 2b) Thermal Treatment of Solid Recovered Fuel.*
2. That the Staff and Consultant team for the Durham/York Residual Waste Study be directed to proceed with the evaluation of "Alternative Methods" in accordance with the approved EA Terms of Reference, including (but not limited to):
  - a. Consult with the public and agencies and confirm the proposed evaluation methodology and criteria to be utilized throughout the evaluation of "Alternative Methods";
  - b. Determination of optimal facility size and throughput and resulting site size requirements;
  - c. The identification and evaluation of siting alternatives for a processing facility;
  - d. The evaluation of implementation methods, including ownership options, public-private partnerships and system financing; and
  - e. Initiation of a formal competitive procurement process as part of evaluation of "Alternative Methods" of implementing the preferred undertaking.