



Solid Non-Hazardous Waste Disposal Site Inspection Report

Client:	The Corporation of the Municipality of Southwest Middlesex Mailing Address: 153 McKellar St, Post Office Box, 218, Glencoe, Ontario, Canada, N0L 1M0 Physical Address: 153 McKellar St, Southwest Middlesex, Municipality, County of Middlesex, Ontario, Canada, N0L 1M0 Telephone: (519)287-2015, FAX: (519)287-2359, email: jfrancisco@southwestmiddlesex.ca Client #: 2308-4XUQEP, Client Type: Municipal Government, NAICS: 913910		
Inspection Site Address:	Limerick Road Landfill (Mosa Landfill) Address: Lot: 23, Concession: 3, Geographic Township: MOSA, Southwest Middlesex, Municipality, County of Middlesex District Office: London - District GeoReference: Map Datum: NAD83, Zone: 17, Accuracy Estimate: 10-30 metres eg. Medium Quality GPS, Method: GPS, UTM Easting: 431559, UTM Northing: 4724065, , LIO GeoReference: Zone: , UTM Easting: , UTM Northing: , Latitude: 42.6661, Longitude: -81.8336 Site #: 6536-62NRPU		
Contact Name:	Jill Bellchamber-Glazier	Title:	CAO/Clerk
Contact Telephone:	519-287-2015 ext109	Contact Fax:	
Last Inspection Date:	2016/12/07		
Inspection Start Date:	2018/01/11	Inspection Finish Date:	2018/01/11
Region:	Southwestern		

1.0 INTRODUCTION

On January 11, 2018 a solid non-hazardous waste disposal site inspection was conducted by Nicole Does at the Limerick Road Landfill, located on Lot 23, Concession 3, in the Municipality of Southwest Middlesex. The inspection consisted of a file review at the municipal office, followed by a tour of the landfill. Present during the inspection was Provincial Officer John McGlynn, Public Works Manager Tara Clayton, and CAO/Clerk Jill Bellchamber-Glazier.

The site is surrounded by agricultural land and forested areas, and is several metres south of the Fansher Creek. It services Southwest Middlesex and Chatham-Kent Zone, and is open on Wednesdays from 12PM to 5PM, and Saturdays from 9AM to 5PM.

This planned and scheduled inspection is part of the Ministry of Environment and Climate Change (MOECC) London District Office's 2017/2018 inspection program. The purpose of the inspection is to assess compliance with the requirements of the Environmental Protection Act, the Ontario Water Resources Act, Regulation 347 (Waste), Certificate of Approval #A041902, and all other applicable MOECC policies and guidelines.

2.0 INSPECTION OBSERVATIONS

Certificate of Approval Number(s):
A041902

Certificate of Approval # A041902 was issued originally in 1971, and renewed each year until its final issuance in 1980, which was not given an expiry date. It approves the use of 6 hectares (15 acres) for the disposal of domestic

and non-hazardous solid industrial (limited to fencing etc., from agriculture) wastes.

The Approval has two conditions, including:

- Requirement to register to approval on file
- no burning of domestic waste at the site (as of August 28, 1980)

2.1 FINANCIAL ASSURANCE:

Specifics:

Financial Assurance is not applicable for the Limerick Landfill as it is owned by the municipality.

2.2 APPROVED AREA OF THE SITE:

Specifics:

The site does not have a waste footprint defined in the Approval. The municipality is unable to identify what areas have been landfilled in the past. Mike Sholdice, the contractor in charge of operating the site, stated during an MOECC inspection in December of 2016 that most of the 6 hectares have been filled at some point, with the exception of the wooded area to the south. The current active cell is located to the south of the entrance, landfilled using the trench and fill method. No deposited waste or blown litter was observed outside the perimeter of the site.

2.3 APPROVED CAPACITY:

Specifics:

There is no approved maximum waste capacity listed in the Approval. The municipality is unaware of what the current waste capacity at the site is. No records are kept of the quantity or type of waste coming in, with the exception of some tipping fee receipts which only document the amount paid by the individual who deposited the waste.

2.4 ACCESS CONTROL:

Specifics:

There is fencing around the site with a gate and an informative sign at the entrance.

During the inspection, the entrance gate was not locked, however Mr. Sholdice was on-site performing maintenance on equipment. The fence surrounding the property was damaged in some areas along the west end, and there was no fencing visible along the south end. It is recommended that fencing be installed on the south end, and maintenance be done on the surrounding fence perimeter to ensure the site is properly secured. This is a standard practice for both open and closed landfills.

2.5 COVER MATERIAL:

Specifics:

Ms. Clayton stated that cover is now being used on an as-needed basis. Cover material was piled beside the active cell and is re-stocked every 12 weeks by Public Works. During the inspection, the active waste cell was uncovered. A cat was observed around the waste, and there was evidence of animal trails around/through the waste. Ms. Clayton acknowledged the presence of a rat population as well.

On Friday January 12th, an email was received from Mr. Sholdice stating that he had pushed and covered all exposed waste approximately a few hours after the inspection. He mentioned that waste is generally covered within 24 hours after the landfill has been open.



Active waste cell during inspection



Active waste cell later that afternoon (pushed and covered). Picture taken and sent by Mr. Sholdice

2.6 WASTE BURNING:

Specifics:

Condition 2 in the Certificate of Approval states that no burning of municipal waste is permitted. Burning still takes place at the site on an as-needed basis. During the inspection, there was evidence of burning other than clean wood and brush. Observed were the remains of wood furniture, door knobs, table frame/legs, other pressure treated wood, cans and other unidentifiable debris. The burning of waste other than clean wood and brush has been an ongoing issue communicated in past MOECC inspection reports in 2016, 2014 and 2004. The municipality is reminded that these materials do not meet the criteria for "clean wood and brush".

The definition of "municipal waste" taken from Regulation 347, is:

(a) **any waste**, whether or not it is owned, controlled or managed by a municipality, except,

- (i) hazardous waste
- (ii) liquid industrial waste
- (iii) gaseous waste, or

(b) solid fuel, whether or not it is waste, that is derived in whole or in part from the waste included in clause (a)



Evidence of burning.



Mr. Sholdice stated that these plastic bags contained only weeds, ashes and pine tree needles, and that the burn pile in this picture are ashes dumped from barrels brought by residents.

2.7 GROUNDWATER/SURFACEWATER IMPACT:

Specifics:

At the time of the inspection, it was difficult to assess the condition of surface water due to the wet weather conditions and partially snow covered ground. No obvious leachate springs or ponding was observed. The pond on-site was reported to have garbage floating in the water at times, however this could not be visually confirmed during the time of inspection due to the wet/snow covered ground conditions, which limited walking access in certain areas of the site. This landfill sits in a generally low-lying area, with a wetland and a creek nearby. The Fansher Creek is several metres north of the property, and eventually drains into the Sydenham River.

No groundwater monitoring has ever been conducted in this area, with the exception of a Preliminary Hydrogeological Assessment done in 1981. In August 2017, the municipality retained RWDI AIR Inc. to conduct a surface water characterization in the vicinity of the Limerick Landfill, which included an upstream and downstream sample of Fansher Creek, and the wetland area located in the central portion of the site. The sample results show concentrations of phosphorous and iron in both creek samples, with higher concentrations upstream than downstream, which RWDI did not attribute to landfill leachate. Phosphorous levels also exceeded limits in the wetland sampling location. The report recommends that a surface water quality monitoring program be established for the site with semi-annual monitoring in spring and fall, given the proximity of the wetland feature and creek. The full surface water report is attached to this inspection report.

During the inspection, Ms. Clayton stated that for now, further surface water sampling will be taking place annually.

2.8 LEACHATE CONTROL SYSTEM:

Specifics:

There is no leachate control system in place for this site.

2.9 METHANE GAS CONTROL SYSTEM:

Specifics:

There is no methane gas control system in place for this site.

2.10 OTHER WASTES:

Specifics:

The municipality has 2 bins for household recyclable materials, provided and picked up by Waste Management. Other noted recycled material accepted on-site includes used tires, leaf and yard waste, and construction and demolition waste (including shingles, carpeting, porcelain, and concrete).

Ms. Clayton said that composting does not take place on-site anymore, and she is not aware of any treated characteristic waste being accepted.

No subject waste was observed on-site during the inspection. There was a large pile of household appliances on-site, including but not limited to refrigerators and stoves. The municipality does not keep an accurate record of the number of refrigeration units accepted at the landfill, and does not keep a record confirming that they have been inspected prior to receiving to ensure that the refrigerator units are properly tagged. Section 41(1) of Regulation 463/10- Ozone Depleting Substances and Other Halocarbons, states "A person shall not dismantle, destroy, recycle, incinerate or dispose of by depositing in a dump or landfilling site refrigeration equipment or a container that has contained refrigerant unless a notice has been affixed to the equipment or container under section 32 and the equipment or

container is dismantled, destroying, recycled, incinerated or disposed of by depositing in a dump or landfilling site in a manner authorized under the Act O. Reg. 463/10, s. 41 (1)."

3.0 REVIEW OF PREVIOUS NON-COMPLIANCE ISSUES

The burning of waste other than clean wood and brush on-site has been an ongoing issue communicated in past MOECC inspection reports in 2016, 2014 and 2004. MOECC inspection in 2014 identified 10 containers with what appeared to be used oil stored on-site. Jaime Francisco (Public Works Manager at the time) provided a receipt for soil removal contaminated by hydrocarbons, caused from spillage of the containers.

4.0 SUMMARY OF INSPECTION FINDINGS (HEALTH/ENVIRONMENTAL IMPACT)

Was there any indication of a known or anticipated human health impact during the inspection and/or review of relevant material, related to this Ministry's mandate?

No

Specifics:

Was there any indication of a known or anticipated environmental impact during the inspection and/or review of relevant material ?

No

Specifics:

Was there any indication of a known or suspected violation of a legal requirement during the inspection and/or review of relevant material which could cause a human health impact or environmental impairment ?

Yes

Specifics:

Evidence of waste other than clean wood and brush was observed to have been burned on-site, including:
-tables, doors and other wood furniture
-pressure treated wood
-cans and other unidentifiable debris

Was there any indication of a potential for environmental impairment during the inspection and/or the review of relevant material ?

No

Specifics:

Was there any indication of minor administrative non-compliance?

No

Specifics:

5.0 ACTION(S) REQUIRED

1. The Corporation of the Municipality of Southwest Middlesex must ensure that only clean wood and brush are burned at the Limerick Landfill. Confirmation of this must be sent to the undersigned Officer, with a signature from the Publics Works Manager as well as the Site Attendant, Mike Sholdice. Confirmation must be made by email or letter, no later than February 9, 2018.
2. The Corporation of the Municipality of Southwest Middlesex must keep John McGlynn (Area Environmental Officer) informed on all decisions regarding the operations the Limerick Landfill. This includes but is not limited to submitting the final Operations Review no later than 7 days after receiving it.

No

6.0 OTHER INSPECTION FINDINGS

The Limerick Landfill has been operating since 1971, with the same Certificate of Approval containing only two conditions. This Approval is in need of updates to reflect the Ministry's current standards of landfill operations and requirements.

There is very little information known about the Limerick Landfill. The municipality has not been required by the Ministry to do any ground or surface water monitoring, aside from a preliminary hydrogeological assessment in 1981. There are no records to be able to determine the current capacity and location of waste on-site.

The municipality has retained Archibald Consulting to complete an Operations Review of the Limerick Landfill, which will make recommendations for the future plans of the landfill. There is a possibility that the Limerick Landfill may close in the future if it is not economically viable to upgrade the site to current Ministry standards. In the case of closure, waste services from Limerick would be directed to the Trillium Road Landfill.

Ms. Clayton and Ms. Bellchamber-Glazier acknowledged that they would keep the Ministry posted on the municipality's decisions made for both landfills going forward. It was understood during the inspection that if the Limerick Landfill is to close, a completed Closure Plan must be submitted to the Ministry for approval. If the Limerick Landfill is to stay operational, the process of updating the existing Approval will be initiated.

7.0 INCIDENT REPORT

Applicable
1143-AUXSV2 

8.0 ATTACHMENTS

170816_DRAFT RPT -Limerick LF SW Characterization_1703470 2000.pdf

PREPARED BY:

Environmental Officer:

Name:

Nicole Does

District Office:

Southwestern Region

Date:

2018/01/29

Signature



REVIEWED BY:

District Supervisor:

Name:

Dan Crompt

District Office:

London District Office

Date:

2018/01/29

Signature:



File Storage Number: -

Note:

"This inspection report does not in any way suggest that there is or has been compliance with applicable legislation and regulations as they may apply to this facility. It is, and remains, the responsibility of the owner and/or the operating authority to ensure compliance with all applicable legislative and regulatory requirements"

