

From: [Andrew Garland](#)
To: [Jessica Clapp](#); [Sarah Upshall](#)
Cc: [Sean Thomas](#)
Subject: RE: 23269 - Mid-Huron Landfill, Leachate Transfer Facility - Draft 2024 Annual Reports
Date: May 14, 2025 11:32:47 AM

Hi Jessica:

See notes below.

Andrew

From: Jessica Clapp <jclapp@goderich.ca>
Sent: Wednesday, May 14, 2025 8:45 AM
To: Andrew Garland <agarland@bmross.net>; Sarah Upshall <supshall@bmross.net>
Cc: Sean Thomas <sthomas@goderich.ca>
Subject: RE: 23269 - Mid-Huron Landfill, Leachate Transfer Facility - Draft 2024 Annual Reports

Good morning Andrew and Sarah,

The Mid-Huron Recycling Board did have two questions regarding the Mid-Huron Landfill Status Report, both on page 29:

1. On the top of page 29, point #1 – regarding the elevated chloride. The Board was wondering if you could expand on the sources of the elevated chloride and what type of monitoring may be needed in the future if this trend continues. Is this something to be concerned about?

In general, we would anticipate chloride sources in a setting like this to be from one of two sources: landfill leachate, or runoff from road salting activity. Focusing on the surface water quality results in Bridgewater Creek, we compare water quality “upstream” of the landfill site (i.e., expected not to be impacted by landfill activity or landfill leachate) to a monitoring location “downstream” of the landfill. Any increases in contaminant concentration from upstream to downstream could be indicative of a landfill related impact.

For 2024, we see that in the spring, chloride concentrations in Bridgewater Creek decreased from upstream to downstream (i.e., from 120 mg/L at upstream monitor SW13 to 55 mg/L at downstream monitor SW8). Our interpretation of the data is that road salting activity is the cause of the upstream results, especially considering that spring sampling follows a relatively short time after road salting activity would cease for the season. This trend reversed in the fall, with chloride going from 55 mg/L upstream to 76 mg/L downstream, which could be indicative of a small leachate impact. At this time we are not recommending any changes to monitoring locations or frequency, but will continue to monitor trends and will also discuss with the hydrogeologist in the context of the broader leachate volume generation review that is in progress.

2. Under 5.0 Recommendations (#5) – engage with MECP Regional Office – would you be able to expand further on this point. What types of discussions are needed?

With reference to the final paragraph of report section 2.9, we note that in January 2025 the MECP Regional Office provided a relatively general comment that leachate monitoring trigger criteria is “over 30 years old”, the landfill is now closed, and it may be time to update monitoring methodology. We don’t know what the MECP has in mind, but because they

have presented this comment we recommend further engagement with them. Our best guess at this time is that the MECP may ask us to complete a review of the methodology (which could include monitoring locations, monitoring parameters, and the concentration levels that would trigger further action) and provide a recommendation regarding whether current methodology be maintained or revised.

We will follow up with the Board after receiving your response. Thank you in advance,
Jessica