September 6, 2018

Dear All:

You are receiving this communication to keep you apprised of the status of the ongoing environmental monitoring activities associated with the closed Waste Management (WM) Landfill property.

Under the Environmental Compliance Approval (ECA) Conditions set forth in the Environmental Monitoring Plan (EMP) dated April 15, 2016 and ordered by the Environmental Review Tribunal (ERT), WM has notified the MOECC District Manager of results from the most recent sampling event conducted as a part of scheduled summer 2018 environmental monitoring event conducted on August 9, 2018.

We are providing, for your information, the notice supplied to MOECC on September 6, 2018. All results outlined in this notice are related to concentration exceedances at upstream and downstream surface water sampling locations within the proposed Contaminant Attenuation Zone (CAZ).

All results are generally consistent with historical results and will be evaluated in the fall semi-annual report that will be issued by January 15, 2019.

Regards,

Bill McDonough
Manager, Richmond Landfill
Waste Management of Canada Corporation

Encl.
MEMORANDUM

DATE: September 6, 2018
TO: Trevor Dagilis, District Manager, Ministry of the Environment, Conservation and Parks (MECP)
CC: David Arnott, Shawn Trimper and Peter Taylor (MECP)
Chris Prucha, Bill McDonough and Jim Forney (WM)
FROM: François Richard (BluMetric)
PROJECT NO: 180149-02
SUBJECT: Notification of Off-Site Exceedances, WM Richmond Landfill, Town of Greater Napanee

This memorandum is provided on behalf of Waste Management of Canada Corporation as required by Condition 8.7 of Environmental Compliance Approval (ECA) No. A371203 for the Richmond Landfill, Town of Greater Napanee, Ontario. This requirement is outlined in the Environmental Monitoring Plan (EMP) for the site1, implemented on April 16, 2016 on an interim basis as ordered by the Environmental Review Tribunal (ERT) Order dated December 24, 2015. Conditions 8.7 of the ECA stipulates that monitoring results shall be reported to the MOECC District Manager within 48 hours of the determination of the exceedance (initial data screening) if they meet either of the following condition:

- any off-site exceedance of the applicable criteria for groundwater (Reasonable Use Limits (RUL)) or surface water (Provincial Water Quality Objectives (PWQO))

RESULTS

Surface water sampling was conducted at five locations on August 9, 2018 after a summer rain event with precipitation greater than 25 mm (within 24 hrs) following the requirements outlined in the latest EMP for the site.

The analytical results for samples show the presence of parameters that exceeded their respective PWQO criteria, as summarized in Table 1.

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1 Environmental Monitoring Plan, WM Richmond Landfill, Town of Greater Napanee, Ontario, rev. No.05, prepared by BluMetric Environmental Inc., dated April 2016
These include:

- Iron at sampling locations S18 and S20; and
- Phosphorous at locations S18, S19 and S20.

**Table 1. WM Richmond Landfill - Summary of PWQO Exceedances from Summer 2018**

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Units</th>
<th>PWQO*</th>
<th>S18</th>
<th>S19</th>
<th>S20</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iron</td>
<td>mg/L</td>
<td>0.3</td>
<td>1.8</td>
<td></td>
<td>1.2</td>
</tr>
<tr>
<td>Phosphorus (total)</td>
<td>mg/L</td>
<td>0.03</td>
<td>0.1</td>
<td>0.051</td>
<td>0.19</td>
</tr>
</tbody>
</table>

*Provincial Water Quality Objectives*

**CLOSING**

The results from the latest environmental monitoring event are generally consistent with those from previous sampling events, and will be reported as part of the fall semi-annual monitoring report by January 15, 2019 as required by ECA Condition 14.1.

We trust the above information is satisfactory. If you have any questions or need further information regarding the completed work please do not hesitate to contact the undersigned.

Respectfully submitted,

**BluMetric Environmental Inc.**

[Francois Richard, Ph.D. P.Geo.]
Senior Hydrogeologist