



December 11, 2024

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) Richmond Landfill property.

WM has notified the Ministry of Environment, Conservation and Parks (MECP) District Manager of results from the most recent sampling event. This work was conducted on November 29, 2024, to verify some results from the fall 2024 routine semi-annual monitoring event, where 1,4 dioxane was detected at monitoring well M186 for the first time.

We are providing, for your information, with the notice supplied to MECP on December 11, 2024. The results outlined in this notice suggest that the detection of 1,4 dioxane at M186, located within the proposed Contaminant Attenuation Zone, is a false positive.

Regards,

Noah Wayt
Manager, Richmond Landfill
Waste Management of Canada Corporation

Encl.



MEMORANDUM

DATE: 11 December 2024
TO: Cathy Chisholm, District Manager (MECP)
CC: David Arnott (MECP), Chris Prucha, Noah Wayt and Chad Moose (WM)
FROM: François Richard and Madeleine Corriveau (BluMetric)
PROJECT NO: 240160-04
SUBJECT: Groundwater Monitoring Well M186 Verification Resampling Results, WM Richmond Landfill, Town of Greater Napanee

This memorandum is provided on behalf of Waste Management of Canada Corporation (WM) to report on recent supplementary sampling results for the Richmond Landfill, Town of Greater Napanee, Ontario.

Analytical results from the fall 2024 routine semi-annual environmental monitoring event exceeding applicable criteria were provided to the Ministry of Environment, Conservation and Parks (MECP) in a memorandum dated November 14, 2024, as required by Conditions 8.7 and 8.8 of Environmental Compliance Approval (ECA) No. A371203. The fall 2024 semi-annual monitoring event was conducted between October 22 and 24, 2024, following the requirements outlined in the current Environmental Monitoring Plan (EMP) for the site¹.

The November 14 memorandum identified that 1,4-dioxane was detected in the sample from monitoring well M186 for the first time. The laboratory (Bureau Veritas) conducted an internal investigation and confirmed the reported result; thus, verification resampling was conducted on November 29, 2024. A sample was collected from groundwater monitoring well M186 and analyzed for the primary leachate indicators (1,4-dioxane and alkalinity).

Resampling results indicate that the sample from monitoring well M186 is below detection for 1,4-dioxane. These results are consistent with historical results (see **Table 1**) and suggest that the detection of 1,4-dioxane at M186 on October 24, 2024, was a false positive result. Corresponding low alkalinity concentrations relative to other impacted wells (typically greater than 400 mg/L where 1,4-dioxane is present) support this conclusion.

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



Table 1: Historical 1,4-Dioxane and Alkalinity Results at Groundwater Monitoring Well M186

Date	M186	
	1,4-Dioxane (mg/L)	Alkalinity (mg/L)
9/5/2014	< 0.001	300
11/26/2015	< 0.001	300
12/21/2015		320
5/4/2016	< 0.001	320
10/19/2016	< 0.001	360
5/3/2017	< 0.001	340
10/18/2017	< 0.001	370
5/17/2018	< 0.001	360
10/16/2018	< 0.001	360
5/2/2019	< 0.001	350
10/30/2019	< 0.001	350
4/7/2020	< 0.001	340
10/29/2020	< 0.001	350
5/6/2021	< 0.001	340
10/29/2021	< 0.001	340
4/28/2022	< 0.001	330
11/3/2022	< 0.001	350
5/11/2023	< 0.001	350
10/27/2023	< 0.001	330
5/9/2024	< 0.001	320
10/24/2024	0.0081	320
11/29/2024	< 0.001	330

We trust the above information is satisfactory. Please do not hesitate to contact the undersigned if you have any questions or need further information.

Respectfully submitted,
BluMetric Environmental Inc.



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



Madeleine Corriveau, M.Sc., P.Geo.
 Senior Environmental Geochemist