

EXCELLENCE IN ENVIRONMENTAL CONSULTING SERVICES May 29, 2009

XCG File No. 1-664-17-03

Chief and Council Mohawks of the Bay of Quinte 13 Old York Road, RR#1 Tyendinaga Mohawk Territory, ON K0K 1X0

Re: Odour Modelling, Richmond Landfill Vicinity

Dear Chief and Council:

1. INTRODUCTION

XCG Consultants Ltd. (XCG) has conducted preliminary and detailed air dispersion modelling to evaluate the potential for odour impacts arising from operations at the Richmond Landfill Site near Napanee, Ontario. This study was completed at the request of the Mohawks of the Bay of Quinte (MBQ), and focused on investigating potential odour impacts from the landfill emissions on the northeast portion of the Tyendinaga Mohawk Territory (TMT). The approach to the air dispersion modelling was based on applicable Ontario Ministry of the Environment (MOE) standards as defined in Ontario Regulation (O. Reg.) 419/05 – Local Air Quality and other supporting MOE guidance. In addition, where appropriate, additional research was completed in order to suitably assess odour emissions resulting from landfill operations.

1.1 Background and Understanding

The Richmond Landfill is approved under Provisional Certificate of Approval (C of A) Number A371203 dated March 30, 1988, with various amendments made to date. The landfill has a licensed tonnage of 125,000 tonnes per year and receives wastes from a combination of municipal/residential, commercial, industrial, institutional, construction, and demolition sources (termed "co-disposal"). The site also accepts hydrocarbon impacted soil for use as cover material. Although the landfill has been in operation since 1954, the waste acceptance rate has varied over the past 55 years. XCG understands that the waste acceptance rate has decreased recently due to reduced designed capacity; however, the landfill is still active and receiving waste.

In this investigation odour dispersion was modelled at a preliminary level using the SCREEN3 air dispersion model. Detailed modelling was conducted using the AERMOD air dispersion model. Appropriate standards described in O. Reg. 419/05 – Local Air Quality and other supporting MOE guidance were used for comparison of modelled point of impingement (POI) concentrations.

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2. DOCUMENTATION REVIEW

Several historic documents were reviewed for information specific to understanding odour characteristics and emissions scenarios at the Richmond Landfill. These included both site-specific reports as well as scientific literature as applicable. The scientific literature review was carried out for landfill odour-specific issues where the site-specific documentation did not provide sufficient information to generate odour-specific data and provide a comprehensive odour emission scenario for the Richmond Landfill and the vicinity.

2.1 Richmond Landfill Site-Specific Reports

The historic site-specific reports reviewed included the following:

- Waste Management of Canada Corporation (WM) document "Richmond Landfill Expansion Environmental Assessment" dated October 2005 (WM EA);
- RWDI Air Inc. report entitled "Richmond Landfill Odour Survey", dated February 4, 2009;
- WM EA Detailed Background Report to Discussion Paper #5 Air Quality Background Conditions, dated November 2004 (Final), prepared by SENES Consultants Limited (SENES);
- WM EA Detailed Background Report to Discussion Paper #7 Air Quality Impact Assessment, dated November 2004 (Initial Draft) and dated September 2005 (Final), prepared by SENES;
- WM 2008 Annual Monitoring Report prepared by Water and Earth Associates (WESA), dated March 2009;
- WM Richmond Sanitary Landfill Site Monitoring Report No. 22, prepared by Genivar Consultants LP (Genivar), dated March 2009;
- Canadian Waste Services Inc. monitoring report prepared by Henderson, Paddon & Associates Limited, dated March 2000; and
- Audit of Canadian Waste Services Richmond Landfill Operation prepared by Terraprobe Limited (Terraprobe), dated May 12, 2000.

Additionally, historic geo-referenced site plans of TMT and the Richmond Landfill as well as aerial survey plans of the landfill from previous work completed by XCG and those available from the reports above were used as the basis for the air dispersion modelling terrain information.

The site-specific documentation reviewed did not have sufficient data in order to adequately estimate odour emissions from all sources at the Richmond Landfill. Odour-specific information was not provided for all landfill operations that might generator odour. For example, the odour generated by active deposition of fresh waste at the working face does not appear to have been adequately accounted for in the previous site-specific air quality modelling studies. Therefore, a concise review of the applicable scientific literature was completed.



2.1.1 Site-Specific Odour Emission Inventory

The following significant odour-related data was compiled, current as of 2008, based on the available site-specific documentation:

- Total accepted landfill waste in 2008: 10,316.29 tonnes;
- Total estimated waste mass: 2.7 million tonnes (up to 2008);
- Total approved landfill area: 16.2 ha (approximately 550 x 300 m);
- Maximum elevation of waste mound (based on 2008 reports): 165.0 metres a.s.l., approximately 40 metres above grade;
- Gas collection vertical gas wells: 47 (depths and efficiencies unknown);
- Leachate/gas collection: 5 clean-outs, 3 manholes listed (12 manholes on drawings);
- Total leachate collected in 2008: 37,942.70 m³ (approximately 103.95 m³ per day);
- Total number of waste trucks per day: approximately up to 110 trucks (historically).

This compiled data was used to generate odour emission estimates from landfill gas (LFG) generation and fresh waste placement activities. Based on initial calculations, only odour emission estimates from fresh waste operations were considered significant in this report. It is understood that there are presently air monitoring stations at the property boundary, but details on these locations and their placement rationale are unknown.

A weather station is located to the south of the main office at the Richmond Landfill, but the reliability of data as applicable to representative site conditions is unknown (e.g. anemometer height, proper siting relative to surrounding terrain including the main waste mound, data collection frequency, etc.). Previously, air quality was assessed by WM's consultants using one year of meteorological data from the Kingston airport. This "metdata" was selected due to the station being located "very close" to the Richmond Landfill "from a regional perspective." Additional metdata considerations are provided below related to appropriate data selection for site-specific dispersion analysis.

The leachate holding lagoon located to the north of the main waste site is stated to be only slightly impacted by leachate on a temporary basis (part of WM's leachate management plan) and is considered not odorous according to WM documentation. The lagoon was not used in 2008. It is believed that odorous emissions from this lagoon may have been historically present as a result of leachate management operations. In addition, leachate collection manholes were not assessed quantitatively in terms of their odour emissions in the WM EA documentation. Although they are relatively small sources individually, as these are potentially strong odours and ground level sources, they are less likely to disperse effectively due to relatively stagnant air movement close to the ground surface. In addition, masking of odour from other sources (i.e. landfill gas and freshly placed waste) is difficult to assess or disqualify; additive effects may also occur and produce higher overall odour emissions on a detectable odour basis.

Composting operations are present to the west of the main waste mound at the Richmond Landfill. According to the site-specific documentation, compostable material includes biosolids and sludge from waste water treatment facilities. Although characteristically different in odorous "tone," the composting operations on-site are another source of odour emissions



contributing to the overall odour scenario. The odour emissions were assessed in the WM EA using non-site-specific data. WM's results showed odour impacts to the surrounding area exceeding the MOE odour threshold values. Modelled off-site impacts as high as 3.92 OU/m^3 were identified in the 2005 WM EA document (based on the WM EA report entitled "Detailed Background Report to Discussion Paper #5 – Air Quality Background Conditions." The MOE odour threshold value is 1 OU/m³ at 0.15% frequency or 3 OU/m³ at any frequency.

Other potential sources of odour include a pad for temporary soil storage located near the main entrance area, use of hydrocarbon contaminated soil as cover material, and LFG not captured by the gas collection system.

2.2 Scientific Literature and Reference Documentation

A brief review of the available scientific literature related to landfill odour was completed. XCG focused on gathering and reviewing odour emission and flux data specific to significant odour sources at landfills. Despite WM EA documentation regarding odour source inventories at the landfill, only composting and LFG sources of odour were historically assessed.

The literature reviewed (Bibliography attached) indicated that odour from fresh waste operations is the most significant source of odour emissions from landfills, with odour emissions and flux data typically orders of magnitude greater than those calculated from LFG generation. The odour emission rate of LFG for the Richmond Landfill site was conservatively calculated by XCG based on compiled odour-specific data from WM documentation (see above) to be on the order of 10^2 odour units per second (OU/s), with an odour flux rate on the order of 10⁻⁴ OU/s/m² (accounting for assumed 70% LFG collection efficiency). By comparison, the equivalent odour emission rate based on odour flux conversions for fresh waste operations is on the order of 10^3 to 10^4 OU/s (or between 10^{-1} to 10^1 OU/s/m²). For example, one study indicated that typical fresh waste tipping operations generated a geometric mean of 67,000 OU/s (Nicolas, J. et al., 2008), based on actual field measurements. This value was used in the odour dispersion modelling performed and reported below. It should be noted that odour from fresh waste acceptance at the Richmond Landfill was not assessed to any degree in the WM EA documents reviewed. According to Nicolas, J. et al. (2008), there is only low correlation between odour emission rate and truck frequency, and that odour is mainly generated from fresh waste handling operations.

Although it is acknowledged that WM applies daily cover to the fresh waste in order to control odour emissions, there is potential for significant areas of exposed waste to be present over the surface of the active working face each day before daily cover has been applied. XCG's modelling is based on estimates of the daily exposed area of fresh waste at the working face.

3. APPLICABLE CRITERIA

Several sources of information were gathered and reviewed to determine appropriate emission data, applicable standards, and procedures related to assessing odour-related impacts. These sources are documented below.



3.1 MOE Proposed Approach for the Implementation of Odour-Based Standards and Guidelines

According to the MOE Proposed Approach for the Implementation of Odour-Based Standards and Guidelines, an odour impact occurs when there is a simultaneous occurrence of the following:

- Discharge of a contaminant from a facility;
- A human receptor; and
- The correct meteorology to direct the emissions from the facility to the receptor.

Consequently, an odour impact may not occur under all meteorological conditions. Thus, a sampling program consisting of limited grab samples is not deemed adequate to assessing potential odour impacts (as was the case in the WM EA documentation). Furthermore, sampling field investigations including representative sampling data is considered part of Tier 2 Procedures described in the MOE Interim Guide to Estimate and Assess Landfill Air Impacts (see below). Representative sampling data may be difficult to obtain due to the complex nature of odour discharges from landfill sites. The limited sampling completed historically (in terms of both time and location sampling) suggests a high degree of uncertainty for the overall odour emissions scenario.

An appropriate regional meteorological data set must be chosen to represent a geographical region in order to reflect parameters that would affect dispersion modelling. The Richmond Landfill is located within the MOE Eastern Region (Ottawa, Peterborough, Belleville) and the applicable regional meteorological datasets have been used from the MOE website (see details below). As noted previously, the WM EA documentation indicated that only a limited meteorological data set (one "representative" year's worth of data from the Kingston airport) was used for dispersion modelling.

The guidance regarding odour-based standards details a 10-minute odour-based limit of 1 OU/m^3 at the receptor location and a frequency limit of 0.15% (or approximately 13 exceedances per year). It should be noted that the historic WM EA documentation considered odour impacts exceeding a 0.60% frequency as the non-compliance scenario.

3.2 MOE Interim Guide to Estimate and Assess Landfill Air Impacts

The MOE Interim Guide to Estimate and Assess Landfill Air Impacts (Interim Guide), dated October 1992, provides guidance on estimating emission rates related to landfill emissions to the atmosphere. The three-staged recommended procedures (Tier 1, 2, and 3) describe progressively detailed information in order to estimate landfill gas generation and associated odours.

The first stage, Tier 1, is a first-order kinetic model using the site history to estimate landfill gas generation and non-methane organic compound (NMOC) emissions. Tier 2 describes requirements for statistically representative field investigations in order to replace the NMOC constant calculated in Tier 1. Tier 3 Procedures involve detailed site-specific data to replace the NMOC constant and the landfill gas generation rate constant.

The Tier 2 Procedures describe a minimum of five preliminary samples to determine what number of samples will ensure a statistically representative data set. The historic



background reports (WM EA "Detailed Background Report to Discussion Paper #5 - Air Quality Background Conditions" November 2004, WM EA "Detailed Background Report to Discussion Paper #7 - Air Quality Impact Assessment, Initial Draft (November 2004) and Final (September 2005)) document that a total of five grab samples were collected for odour-related analyses, including one quality control blank sample, which was not deemed to be representative due to possible cross-contamination.

Furthermore, the samples collected were not evenly distributed across the landfill, as recommended by the Tier 2 Procedures. Additionally, emission rates were not explicitly provided for any of the contaminants or were stated without reference to supporting calculations. Site-specific data may be used to replace the "upper range" default values for odour concentration estimates. However, due to inappropriate or statistically insignificant sampling procedures (i.e. the sampling results from the Tier 2 procedures must indicate statistical significance of at least 90% confidence and specify the 20% confidence interval, neither of which were stated to be achieved with the limited WM sampling program), the site-specific historic data has not been used in the calculations for odour emission estimates. WM EA documentation states in Appendix H: Uncertainty Analysis of the "Detailed Background Report to Discussion Paper #5 – Air Quality Background Conditions" (November 2004) that a "medium degree of confidence with a conservative bias" was assessed for odour flux, but the statistical specifics were not stated.

Tier 3 Procedures also provide guidance in estimating odour impacts. In preliminary odour emission calculations, it was determined by XCG that odour emissions as a direct result of LFG were significantly less than the odour from fresh waste operations described previously. XCG's dispersion modelling was based on odour emissions from fresh waste operations only; other sources of odour were not included in this odour assessment in order to consider a conservative odour impact scenario.

3.3 USEPA AP42 Emission Factors

The US Environmental Protection Agency provides AP42 emission factor documentation in order to estimate landfill air emissions. The Landfill Air Emission Estimation model equation provided is also referenced in the MOE Interim Guide to Estimate and Assess Landfill Air Impacts. There are minor variances in accepted equation factors and coefficients, as well as representative NMOC constituents (e.g. hexane versus vinyl chloride) and number of speciated LFG components. Because XCG's modelling was based only on odour from fresh waste operations, as explained above, these NMOC components, which are associated with LFG emissions and not fresh waste, were not taken into account at this time.

4. HISTORIC ODOUR EMISSION DISPERSION MODELLING

As mentioned previously, historic WM EA background documentation included information regarding odour emission dispersion modelling. Upon review of the available information, several deficiencies were noted and are described below.

Samples collected for odour analyses were essentially "grab" samples. The number of samples collected failed to account for potential odour impacts (see definition of simultaneous occurrence above) as a result of time, location, and correct meteorology. In



addition, research indicates that even the sampling equipment itself (the sampling bags) can contribute to masking or enhancing perceived odours (Juarez-Galen, J.M., I., 2008).

XCG reviewed the February 2009 RWDI report, which documented an odour survey conducted from December 8 to 31, 2008. The report indicates that meteorological conditions were recorded each day, but this information is not provided in the report. Therefore, it is not possible to assess whether the weather conditions during the survey would at any time have been approaching worst-case conditions in terms of odour impacts from the landfill. More extensive odour monitoring, with well documented meteorological information, conducted through all seasons of the year, is needed to more accurately characterize the odour impacts of the site.

The meteorological data used in the historic dispersion modelling is not considered comprehensive. Only one year of data (1991) from the Kingston Airport was used and determined to be representative. The MOE-provided data is compiled from five years of hourly weather station data. The average wind speed was noted to be 4.5 m/s. For comparison, the MOE-approved weather station data for use at the Richmond Landfill location (Ottawa) is 3.33 m/s, or approximately 25% less, with more easterly and northeasterly wind vector components. The Kingston Airport location is located very close to the Lake Ontario shoreline and is subject to shoreline meteorological effects. Even the WM EA (October 2005) document indicates (Section 5.4, page 5-14) that the Bay of Quinte (and thus, the Richmond Landfill site) is "isolated from the main lake" and unlikely to be affected by "wind induced mixing." Therefore, the chosen meteorological data is not considered representative for the subject site. Historic wind roses and explanatory documentation are attached (Attachment A) for regional locations for comparison, including up to 30 year compiled hourly data. Note that the Kingston wind rose indicates higher wind classes more likely to provide higher dispersion of emissions from the landfill.

The dispersion model chosen in the WM EA was ISC3. The US EPA has stated that ISC3 is being phased out in favour of AERMOD, which should be used effective December 9, 2005 for most scenarios. A number of technical differences indicate that the "next-generation" AERMOD model provides more realistic and representative results.

As noted previously, odour impacts exceeding the 1 OU/m^3 limit at a frequency of 0.15% is now considered the appropriate guideline.

5. DISPERSION MODELLING

Air dispersion modelling was conducted in accordance to the MOE "Air Dispersion Modelling Guideline For Ontario" dated March 2009. This document provides guidance for air dispersion requirements set out in O. Reg. 419/05. Both screening level (SCREEN3) and detailed (AERMOD) dispersion models were used. Both models are approved by the MOE as provided by the US EPA. Approved graphical user interfaces/software for the models were used (Screen View 3.0.0 and AERMOD View 6.1.0).

5.1 SCREEN3 Screening Level Dispersion Modelling

Using a lower bound for odour emission rates of fresh waste operations as indicated in the scientific literature reviewed (0.2 OU/s/m^2), screening level dispersion was conducted. Based on the understanding that the working face of the landfill would be the most likely



source of fresh waste odour emissions, an "area" source was provided as input for the model. It was conservatively assumed that the working face was approximately 100 m by 25 m, with a conservative release height of 40 metres above grade.

Although the SCREEN3 model produces a 1-hour averaging period data which needs to be converted to a 10-minute averaging period, it was observed that even the raw data indicated significant potential impacts at distance of up to 20 kilometres of the source. For reference, the northeast region of the TMT is approximately five kilometres from the Richmond Landfill. At five kilometres, the 1-hour averaging period indicated an odour concentration of approximately 7,500 OU/m³. At 20 kilometres, the odour concentration is approximately 2,000 OU/m³. The converted 10-minute averaging period results would be approximately 65% greater. See Attachment B for a visual representation of the screening level dispersion modelling results.

As the screening level dispersion modelling results indicated significant modelled odour impacts, refining of the modelling using AERMOD was performed.

5.2 AERMOD Dispersion Modelling

For the AERMOD air dispersion model, several inputs are necessary in order for the modelling exercise to be successfully completed. The explicit inputs have been described below for reference. The most current version of AERMOD-View (version 6.1.0) was used for the completion of all AERMOD modelling runs.

5.2.1 Meteorological Conditions

Historical meteorological data ("metdata") was obtained and reviewed from several sites in southern Ontario. The metdata was obtained from the Environment Canada Atmospheric Hazards website for Ontario. Historical metdata for Ottawa, Kingston, Trenton, and Peterborough in the form of annual and seasonal wind roses have been attached (Attachment A). Wind rose documentation provided by Environment Canada has also been attached (Attachment A). The wind data spans from 1971-2000, with up to hourly 24-hour records.

Noticeable spatial and temporal effects are evident for all wind roses. For example, the seasonal Kingston wind roses differ greatly in wind direction and frequency. More specifically, south, southwest, west, and northeast components are very frequent and include higher wind speeds in the fall, but other seasons have relatively infrequent, lower speed, and variable wind vectors. Seasonal variations in wind aspects affect dispersion models due to other associated meteorological factors such as the mixing zone height due to convection effects.

As mentioned previously, it should be noted that the Kingston wind rose is based on data collected from the Kingston airport. While this meteorological station is located within 40 kilometres of the landfill site to the west, the station itself is located less than one kilometre from the shore of Lake Ontario. Significant shoreline effects are known to affect predominant wind direction, speed, and frequency; as a result, the historic dispersion models using Kingston metdata are not considered representative of the modelling area in question.



The Richmond Landfill site is located approximately eight kilometres from the Bay of Quinte. However, Prince Edward County to the south is a large landmass that essentially "buffers" the landfill site from significant offshore winds. Effectively, the landfill site is approximately 40-50 kilometres inland from the prevailing southwest winds, and approximately 30-35 kilometres inland from the southeast shoreline.

Metdata was obtained from MOE online metdata resources. An analysis of the approved regional metdata was performed in order to select appropriate metdata for the air dispersion modelling in the vicinity of the Richmond Landfill. The Richmond Landfill and TMT is within the MOE Eastern Region (Ottawa, Peterborough, Belleville). The selected regional metdata (Ottawa Surface, Maniwaki Upper Air) were prepared with AERMET, the AERMOD meteorological pre-processor, to ensure that the metdata inputs were in the correct AERMOD format. The entire metdata file (approximately 5 years of data) was compiled for the model input to ensure that all recorded meteorological conditions would be accounted for in the model. The compiled metdata wind rose has been included in Attachment A.

Note that very light wind conditions (i.e. wind speeds of less than 1.0 m/s) may not be accurately recorded by standard wind instruments due to minimum sensitivity thresholds. Consequently, metdata may not fully describe all calm conditions (when dispersion would be at a minimum). This limitation may underestimate dispersion effects if there is inadequate or incomplete metdata under calm conditions. An examination of the raw metdata reveals that several records are incomplete; these incomplete records are discarded in the dispersion modelling input.

5.2.2 Area of Modelling Coverage

The area of modelling coverage prepared for the AERMOD model was set to consist of the model extents as well as several kilometres beyond. The additional area of modelling coverage is to ensure unbiased localised meteorological effects in the AERMOD model. The area of modelling coverage was prepared in AERMAP, the AERMOD terrain preprocessor, to ensure that the inputs were in the correct format for the AERMOD model.

To visually determine the dispersion modelling output, a relatively coarse receptor grid was set up with 1,000 metre spacing overlaying the TMT. The MOE specified tiered or radial receptor grid was not used in the model set up since the modelling area was not centred around the Richmond Landfill site. Additional discrete receptors were placed along the border of the TMT for added information specific to the MBQ.

5.2.3 Terrain Data

Ontario Digital Elevation Modelling (DEM) mapping was used to provide terrain data for the AERMOD model. The DEM mapping was obtained from the MOE DEM web site and Tile 124, UTM Zone 18 was used for the model. The DEM was available in 7.5' 30 m resolution. The terrain data was imported into AERMAP and elevations were assigned to the modelled area according to AERMAP defaults. The land use for the modelled area was assigned the default crop/cultivated land values for albedo (reflectance), Bowen ratio (surface moisture), and surface roughness.



The elevation of the TMT is located several metres below the base elevation of the Richmond Landfill. In addition, areas farther north of the landfill are elevated several more meters. The elevated areas may cause under-predictions of modelled concentrations toward the TMT with respect to terrain-following emissions such as odour. The model has been run with both "elevated" and "flat" terrain options to investigate possible terrain effects in the dispersion model.

5.2.4 Averaging Periods

A 1-hour averaging period was used with the AERMOD model. The averaging time was converted to a 10-minute averaging period by specifying the appropriate conversion factor according to MOE guidance (1.65 using historical power exponent decay factor of n=0.28). The converted model results were compared to the 10-minute 1 OU/m³ POI limit described in the MOE odour guidelines.

5.2.5 AERMOD Results

The significantly more complex nature of the AERMOD model conducted provided more refined dispersion results. The geometric mean rate of odour emission for a fresh waste operation source (67,000 OU/s as reported by Nicolas, J. *et al.*, 2008) and working face dimensions (similar to the screening level dispersion model's dimensions) were used as inputs. The resulting 10-minute averaging period odour concentration ranged from approximately 12 OU/m³ at the northeastern-most region of the TMT to approximately 2 OU/m³ at the southwestern-most region of the TMT. The model indicates that under certain meteorological conditions the entire TMT may be significantly impacted by odour emissions, over the MOE odour guideline limits, as a result of fresh waste operations at the Richmond Landfill. A frequency analysis of the potential impacts has not been completed at this time. See Attachment C for a visual representation of the AERMOD dispersion modelling conducted.

6. CONCLUSIONS AND LIMITATIONS

6.1 Conclusions

Based on the air dispersion modelling activities completed, there is potential for odour impacts to receptor locations on the TMT during fresh waste handling operations at the Richmond Landfill, under certain meteorological conditions. It should be noted that other odour sources at the landfill site were not modelled and may contribute to additional potential odour impacts. Based on the modelling results and XCG's research, it is anticipated that the potential odour impacts in the area of the landfill site would be reduced substantially if the landfill were fully capped and closed, and no further operations leading to fresh waste exposure were carried on at the site.

6.2 Limitations

The air dispersion modelling exercises conducted were based on numerous assumptions due to the limited site-specific information available. Furthermore, information on the site was limited to historic reports and documentation. Based on recent site observations of the



Richmond Landfill vicinity and a limited literature review, site-specific source data was developed. These data may vary from actual site conditions and the resultant dispersion models produced may produce results that differ from actual observations. Other variables (such as more detailed temporal data accounting for seasonality) may also affect the dispersion models produced and all possible modelling scenarios have not been fully investigated. Modelling was conducted using the latest available versions of the software specified; future versions issued by the US EPA may result in changes to the modelling results produced. Other dispersion models may give varying results.

The scope of this report is limited to the matters expressly covered. This report was prepared for the sole benefit of the Mohawks of the Bay of Quinte, and may not be relied upon by any other person or entity without the written authorization of XCG Consultants Ltd. Any use or reuse of this document (or the findings, conclusions, or recommendations represented herein) by parties other than the Mohawks of the Bay of Quinte is at the sole risk of those parties.

6.3 Closing

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Yours very truly,

XCG CONSULTANTS LTD.

Salchy

David Chang, B.Sc. Project Specialist

Attachments:

Bibliography

Attachment A: Comparison wind rose plots and documentation Attachment B: SCREEN3 Screening Level Dispersion Modelling Output Attachment C: AERMOD Dispersion Modelling Output



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