

Heather Mitchell  
Sr. Environmental Officer  
Ministry of the Environment,  
Conservation and Parks  
1094 London Road,  
Sarnia, ON N7S 1P1

Date: July 15<sup>th</sup>, 2021

**Re: Clean Harbors Lambton Facility Annual Ambient Air Monitoring 2020**

I am writing in response to your letter of July 9<sup>th</sup>, 2021, and its attached memorandum of the same date, as prepared by Amanda Graham, Air Quality Analyst of the Ministry of the Environment, Conservation and Parks (MECP) - Southwest Regional office, which provides comments in response to the MECP review of the 2020 Annual Report - Appendix H Ambient Air Monitoring 2020 Report prepared by ORTECH Consulting Inc. ('ORTECH') on behalf of Clean Harbors Canada Inc.

ORTECH will provide a revised Appendix H – Ambient Air Monitoring 2020 Report by August 13, 2021, in order to address comments 1 – 12 provided in the July 9, 2021, MECP memorandum, as summarized below.

**Item 1**

ORTECH will revise Tables 11-14 to report a value of half the method detection limit.

**Item 2**

The report will be revised to include only the original sample results and not duplicates.

**Item 3**

In the event of unavailable meteorological data from the Moore Line station ORTECH or Clean Harbors will contact the local MECP office to confirm preferred meteorological data source.

**Item 4**

ORTECH will revise the averages in Table 12 of the report to reflect the geometric mean.

**Item 5**

ORTECH will revise the report to correct this clerical error such that the iron standard of 4 ug/m<sup>3</sup> is referenced.

**Item 6**

ORTECH will revise the report to update the mean and minimum VOC calculations due to a spreadsheet formula error.

**Item 7**

ORTECH will revise the report to include data qualifiers accordingly, and will review flow control procedures toward ensuring against future values outside of the +/- 4 cfm criteria.

**Item 8**

ORTECH will revise the report to include the number of valid hours/sampling periods and percent valid data calculations. ORTECH will also revise the report toward aligning with the annual report requirements described in the Operations Manual for Air Quality Monitoring in Ontario (2018).

**Item 9**

ORTECH or Clean Harbors will provide photos of the north and south stations to be added to the revised report. It is noted, however, that the south site does not strictly adhere to the station siting criteria outlined in the MECP's Operations Manual for Air Quality Monitoring in Ontario (2018), due to limitations imposed by the property host. Based on discussions with Clean Harbors, it is our understanding that the ambient air monitoring program was reviewed as part of the landfill expansion application process, and at that time the limitations of the south station were discussed with Gerald Diamond, Air Quality Analyst for MECP out of the London District Office and that Mr. Diamond was aware of these limitations and had no concern with the location. It is also our understanding that during this review of the monitoring program it was determined by MECP to move the north station to a new location, located now inside the property boundaries of the facility; however, the location of the south station remained unchanged. Should you wish to discuss this further, or arrange an opportunity to visit the site, we would be happy to arrange this at your convenience.

**Item 10**

ORTECH has obtained a copy of the missing Chain of Custody from the Laboratory and will include in the revised report.

**Item 11**

ORTECH will revise the "2020 hi vol calc parameter" spreadsheet for the revised report to reflect correct dates.

**Item 12**

ORTECH will revise the report to include the CAS No information.

Should you have any questions, or wish to discuss, please do not hesitate to contact me via cell phone (519-381-7948) or email at [jgetty@ortech.ca](mailto:jgetty@ortech.ca) or Erica Carabott of Clean Harbors at 519-864-3890 or via email at [Carabott.eric@cleanharbors.com](mailto:Carabott.eric@cleanharbors.com).

Thank You,



Jeff Getty  
Manager, Ambient Monitoring  
ORTECH Consulting Inc.

cc. Terry Lam, Project Manager – ORTECH Consulting Inc.  
cc. Erica Carabott, Senior Environmental Compliance Manager – Clean Harbors