

Sent by email only

Québec, May 8, 2019

Isaac Voyageur
Regional Administrator for Chapter 22
of the James Bay and Northern Quebec Agreement
Cree Nation Government
284, Queen Street, Suite 202
Mistissini (Québec) G0W 1C0

**OBJECT : Development of a new landfill in Whapmagoostui by
Whapmagoostui First Nation
Environmental and social impact assessment study
Questions and comments
N/Réf : 3214-16-099**

Mr. Voyageur,

The Review Committee (COMEX) received, on March 20, 2019, for recommendation, the environmental and social impact assessment study for the project mentioned above.

Following its analysis, COMEX wishes to obtain additional information on various aspects of the project that should, in its view, be clarified. For this purpose, you will find below the questions and comments to address to the proponent. Once COMEX has obtained the required information and the analysis of the project will be complete, a recommendation for this project will be sent to you.

Section 2.1.3 - Provincial guidelines

QC-1. The proponent mentions that the type of landfill that is the subject of this impact study is a northern landfill. Combustible residual materials deposited in a northern landfill must be burned at least once a week, weather permitting.

The proponent must confirm the management method chosen, the type of landfill site to be built and authorized, and ensure that the design criteria for the landfill are adjusted, where applicable.

- QC-2. The proponent have to validate and transmit the distance between the landfill and the nearest rivers and lakes.

Section 2.1.3.2 - Waste management

- QC-3. Considering that the project wishes to comply with the Regulation respecting the landfilling and incineration of residual materials, the proponent must notably document the signage modalities of the site and the origin and nature of the soil recovery.

Section 2.1.3.2 - Waste Management

Section 2.2.1 - Existing waste management facilities

- QC-4. The proponent states that the burning of waste produces smoke and generates emission of contaminants (dioxins, furans, mercury, arsenic, etc.). Exploitation of northern landfill will also generate odors. The proponent should indicate whether any concerns have been raised by the communities regarding air quality and whether air quality monitoring is being considered. If necessary, the proponent must specify the planned follow-up measures.
- QC-5. The proponent states that he wants to operate its site as a northern landfill by adding more conservative parameters more related to trench disposal management. The proponent must specify when, how and by whom decisions will be made regarding the end or resumption of burning or transition operations from one management mode to another. To this end, the proponent must detail the approach chosen for the waste management program and, if necessary, update the schedule for implementation.

Section 3.2 - Access road selection process

- QC-6. The future access road to the site includes eight watercourse crossings. Taking into account the Regulation respecting sustainable development of forests in the domain of the State for the construction of the road and the installation of watercourse crossings, the proponent must describe the working methods and mitigation measures adopted for the installation of watercourse crossings.

Section 4.2.4 - Climate

- QC-7. The proponent must submit a characterization study of the prevailing winds by documenting the percentage of time the wind is directed to the community and any other relevant elements to clarify the impacts of burning and odor emanation from the site to the communities. In light of this study and impact assessment exercise, the proponent will have to specify the mitigation measures to be implemented.

Section 4.4.4 - Land use and tenure

QC-8. The proponent must provide a map to better visualize the layout of the Inuit Category I land access road. The proponent must also specify the distance of the access road to be built in Inuit land and in Cree land.

Section 5.1 - Project location

QC-9. The proponent must send a northern landfill map identifying, in particular, the infrastructures to be constructed, the geographic coordinates of the site, the limits of phases 1 and 2 of the project, the total area of the site and the area of the operating area.

Section 5.2 - Project construction

QC-10. The proponent must locate the existing borrow pits that will be used to supply construction materials. The proponent must demonstrate that the quantity of materials required is available for the project and that the project does not require the opening of new borrow pits, quarries or sandpits.

Section 5.2.3 - Northern landfill

QC-11. The proponent must specify the source of the 40,000 m³ of material required for the construction of the berms.

QC-12. The proponent mentions that the project will be built in two phases. The proponent must specify the area of the site used for each phase, the schedule and the costs related to each stage of construction. The proponent must describe the proposed work method and specify if a progressive restoration is planned.

Section 5.2.3 – Northern landfill

Section 8.3.4 – Aquatic wildlife

QC-13. It is mentioned in the impact study that a ditch will be dug around the landfill and around the platforms to capture the runoff and direct them outside the waste accumulation areas. The proponent must present the flow diagram of these waters, specifying in particular the point(s) of discharge to the environment and the characterization of the receiving environment.

Section 5.2.5 – Contaminated soils storage platform

Section 5.3.5 – Contaminated soils storage platform activities

Appendix B

QC-14. The proponent is encouraged to refer to the Regulation respecting contaminated soil storage and contaminated soil transfer stations to design the contaminated soil storage platform. In addition, the proponent must specify the management mode of the contaminated soils, and without limiting itself, to document the record keeping, the methods of soil sampling and the frequency of analysis. The proponent must also justify the choice of the chosen concept regarding the collection and treatment of leachate and the storage time of contaminated soils in particular.

Section 5.2.5 – Contaminated soils storage platform

Section 5.3.5 – Contaminated soils storage platform activities

QC-15. The proponent must justify the choice of constructing a contaminated soil storage platform alone rather than choosing to construct a contaminated soil treatment platform.

Section 5.3.3 – Landfill operation activities

QC-16. The proponent must indicate why the sludge (septic tank, municipal sludge) will not be disposed of in the northern landfill while the Regulation respecting the landfilling and incineration of residual materials allows it under certain conditions. He must specify how these will be managed.

Section 5.3.4 – Metal storage platform activities

QC-17. The proponent can refer to the *Guide des bonnes pratiques pour la gestion des véhicules hors d'usage* for the activities of warehousing, dismantling, pressing and shredding of the vehicles for the preparation of the vehicles before disposition to the platform envisaged for this purpose.

QC-18. It is mentioned that metal and end-of-life vehicles could be stored up to a maximum of 15 years. The proponent shall detail the planned management mode for metals and end-of-life vehicles including the frequency at which recovery will be performed.

Section 5.3.4 – Metal storage platform activities

Section 8.2.3 – Surface and groundwater quality

QC-19. The proponent must indicate the management mode of residual hazardous materials, used or obsolete electronic products, cumbersome refrigerant gases, etc. to prevent these materials from ending up in the northern landfill.

Section 8.1 – Sources of impact

QC-20. The proponent must clarify what preconstruction activities include.

Section 8.3.5 – Species of concern

QC-21. The proponent indicates that the significance of the project's impact on precarious species, including migratory caribou, is low. The proponent must indicate if any concerns have been raised by the communities regarding this species.

Section 8.2.3 – Surface and groundwater quality

Section 8.4.2 – Water resources, table 50

Appendix L, figure 11

QC-22. Based on the available mapping, a water collection site and the water supply area of the Wetland Complex West area are located within 500 meters and downstream of the landfill. A mitigation measure to avoid the consumption of water in watercourses located less than 500 meters downstream of the landfill is included in the impact statement study and the proponent mentions that the results of surface water analysis will be shared with community members to keep them informed about water quality.

The proponent must specify the mode of communication chosen and the information that will be transmitted to the communities.

Section 11.2.2 – Surface water monitoring

Section 11.2.3 – Sampling frequency and analysis parameters

QC-23. The proponent must characterize surface water and groundwater prior to the operation of the landfill in order to determine the initial state of the environment for the parameters to be monitored, including C10-C50 petroleum hydrocarbons and polycyclic aromatic hydrocarbons.

Section 12.2 – Closure of the Whapmagoostui existing metal storage site

Section 12.3 – Closure of the Kuujjuarapik existing metal storage site

QC-24. The proponent must provide more detail on the elements related to the decommissioning and rehabilitation of the three existing sites (closure method, schedule for completion of closure works, projected use of future sites, post-closure monitoring).

Appendix E

QC-25. The hydrogeological study specifies the value attributed to the hydraulic conductivity and mentions the fact that the level of groundwater varies during the year. The proponent must describe and qualify the assumed migration of contaminants based on the type of soil and hydraulic variations encountered during the year. In addition, the proponent must indicate whether the study covers the entire area where the landfill is located or update the study.

Appendix K

QC-26. The proponent must update the agreement between the Inuit and Cree communities presented in Appendix K. This agreement specifies the responsibilities and deadlines for the various aspects of the project, namely, the development of the landfill, the development of access maintenance and decommissioning of the existing landfill site and other sites currently hosting waste.

General comment

QC-27. The proponent is invited to contact the Abitibi-Témiscamingue and Nord-du-Québec regional direction of analysis and expertise of the Ministry of the Environment and the Fight against climate change to verify the standards applicable to the project for both landfill development and activities such as the development of metal storage platforms and contaminated soils or the closure of the existing landfill.

Best regards,

Vanessa Chalifour

Vanessa Chalifour

Executive secretary

On behalf of COMEX members

Environmental and Social Impact Review Committee - COMEX