



OXFORD COUNTY WASTE MANAGEMENT FACILITY

LANDFILL GAS COLLECTION AND FLARING SYSTEM

2025 ANNUAL MONITORING REPORT

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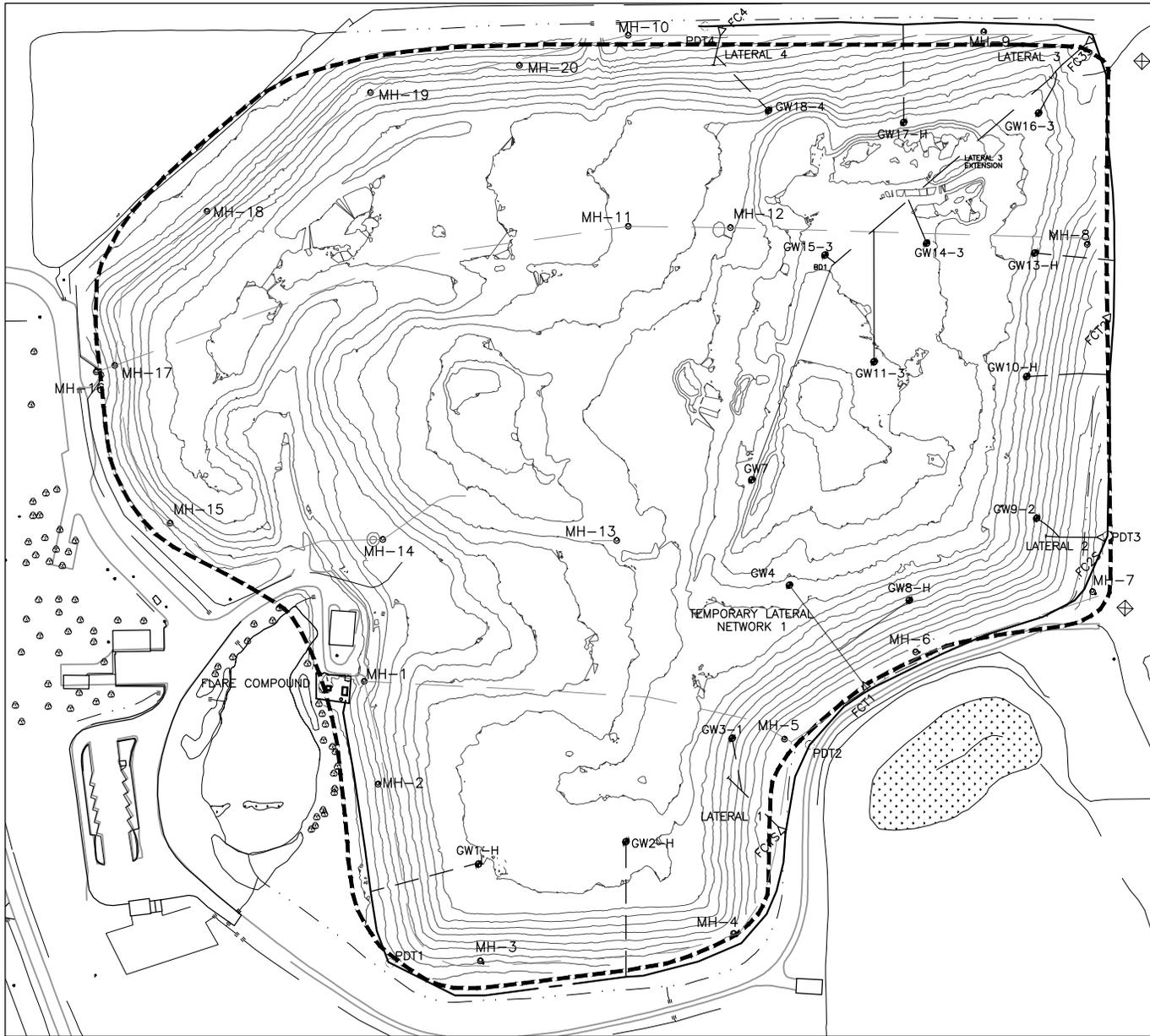
- APPENDIX A Ministry of the Environment, Conservation and Parks Environmental
Compliance Approval (ECA) (Waste) No. A070808
- APPENDIX B Maintenance and Monitoring Schedules
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1.0 INTRODUCTION

Oxford County (County) had Environmental Compliance Approval (ECA) (Waste) No. A070808 amended to allow for the installation of a landfill gas collection and flaring system (LGCFS) at the Oxford County Waste Management Facility (OCWMF) in Salford, Ontario. The original ECA amendment was issued by the Ministry of the Environment, Conservation and Parks (MECP) on September 29, 2010. The MECP revoked and replaced all previous ECAs and issued a new ECA to the County on November 7, 2013. This report is being submitted to fulfil Condition 6.0, which requires an Annual Report outlining the maintenance and monitoring activities of the gas collection system.

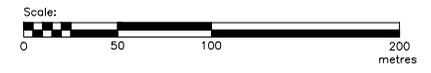
Construction of Phase 1 of the LGCFS commenced in June 2010 and included the installation of 18 vertical extraction wells within the waste. Construction was substantially completed in August 2010, and the system was commissioned in December 2010. In September 2016, three vertical gas wells were drilled and connected to the LGCFS to replace three wells that were decommissioned to allow for landfilling in the vicinity.

In 2025, three vertical gas wells were decommissioned for landfilling in their vicinity. The LGCFS, shown in Figure 1, currently consists of 15 vertical extraction wells.



LEGEND

-  APPROVED LIMIT OF FILL
-  LANDFILL GAS EXTRACTION WELL
-  LATERAL 3 EXTENSION AND WELLS
GW11-3, GW14-3, GW15-3
REPLACED IN SEPTEMBER 2016



2.0 2025 LANDFILL GAS COLLECTION SYSTEM OPERATIONS

2.1 Summary of Plant Operations

Plant operations were maintained throughout 2025 at an average flow of 89.0 cfm and an average methane by volume of 46.1%. The average system vacuum for the year was -38.52 inches of water column. Run times were varied throughout the year, ranging from 30.9% runtime in October to 68.8% runtime in May, and an average runtime of 49.9%. On November 25, 2025, a temporary candlestick flare began flaring operations while the enclosed flare was shut down for the Landfill Gas Facility Upgrades (LFGU) project. The LFGU project will be discussed in further detail in Section 5.1.

Table 1: 2025 Flare Runtimes

Month	Runtimes (hrs)	Runtime (%)
January	253.3	34.1%
February	369.8	55.0%
March	406.4	54.6%
April	411.0	57.0%
May	511.8	68.8%
June	480.3	66.7%
July	406.2	54.6%
August	368.2	49.5%
September	339.6	47.2%
October	230.1	30.9%
November ¹	233.1	32.4%
December ¹	357.9	48.1%
Total	4367.7	49.9%

¹ Runtimes are inclusive of both the enclosed flare and the temporary candlestick flare.

2.2 Assessment of Effectiveness of Gas Collection System

The OCWMF has been in operation since 1986, has a maximum approved waste capacity of 5,905,200 m³ (cubic metres), and receives approximately 45,000 tonnes of non-hazardous residential, commercial, institutional, and industrial solid waste annually. Table 2 presents the estimated landfill gas (LFG) recovery rates for the years 2010 through 2030 using the Scholl Canyon Model with MECP Default inputs for methane production potential (Lo, m³ CH₄/tonne waste) and gas production coefficient (k, 1/yr).

Table 2: Landfill Gas Recovery Rates

End of Year	Landfill Gas Recovery Estimate			
	Scholl Canyon Model			
	Production <i>k=0.04, Lo=125 m³/tonne</i>		70% Recovery	
	m ³ /hr	ft ³ /min	m ³ /hr	ft ³ /min
2010	1,350	794	942	556
2011	1,352	796	946	557
2012	1,356	798	949	559
2013	1,362	802	954	561
2014	1,360	800	952	560
2015	1,359	800	951	560
2016	1,358	799	951	560
2017	1,353	796	947	557
2018	1,346	792	942	554
2019	1,342	790	940	553
2020	1,346	792	942	555
2021	1,362	801	943	561
2022	1,363	803	954	562
2023	1,368	805	958	564
2024	1,372	808	960	565
2025	1,376	810	963	567
2026	1,380	812	966	569
2027	1,384	814	969	570
2028	1,387	817	971	572
2029	1,391	819	974	573
2030	1,394	821	976	574

In 2025, the estimated LFG recovery of 963 m³/hr (567 cfm) is based on a 70% recovery rate. This recovery rate assumes full wellfield coverage and implies that with full coverage 70% of the gas produced on site would be collected and flared. The current recovery rate at the OCWMF is below the 70% recovery rate due to several factors. The first factor is landfill coverage; the existing wellfield coverage at the OCWMF is approximately 25%–30% of the landfill. The second factor is the location of the wellfield coverage, as the existing coverage is primarily in areas of older waste. LFG production declines as waste ages and this then limits the LFG in the vicinity of the well. In addition, where newer waste has been added above the existing LFG wells, the wells have

been incrementally raised; this requires solid piping as opposed to perforated. The influence of these LFG wells then remains limited to the lower, perforated portion of the well installed within the older waste. Due to the current wellfield coverage and age of the waste within the coverage area, the LFG recovery rate at the OCWMF is currently around 15%.

The lower recovery rate at the OCWMF can also be attributed to having a large area of the landfill not at final grade, which therefore does not have LFG coverage. It has been identified that several areas of the landfill are approaching final contours and the expansion of the existing wellfield is planned to occur during the Phase 2 LGCFS expansion. The Phase 2 LGCFS expansions will be further discussed in Section 5.2

2.3 Summary of Unplanned LGCFS Shutdowns

The enclosed flare operated for 328 days in 2025. During this period, the flare tripped numerous times, and restarts were completed on 148 days. A total of 305 alarms were sent during this period in 2025; however, in many instances, multiple alarms were associated with the same issue and were sent out simultaneously or in the same short time period. This contributed to the high number of alarms over the course of the year. The primary causes of alarms in 2025 were those associated with flare flameouts (40.0%), compressed air related issues (32.1%), gas quality/quantity related issues (17.7%), power failures (5.6%), maintenance related/emergency stops (3.6%), and gas analyzer related issues (1%). The numerous flare flameouts are due to low gas quality/quantity to the flare.

On November 25, 2025, a temporary candlestick flare was connected to the LGCFS to maintain operations while the enclosed flare was shut down for the LGFU project.

On July 4, 2025, the flare shutdown exceeded 48 hours and as such was reported to the Spills Action Centre in accordance with Section 7 (11) and (12) of the ECA. The extended shutdown was due to a brief power outage that caused the controls system to freeze. The County was then unable to restart to flare within the 48-hour window and the flare was ultimately restarted on July 7, 2025. Following this event, the County received additional training to address this situation if it occurs in the future.

Historically, the system has had frequent shutdowns due to insufficient gas quantity to run the flare continuously. In 2015, notification was given to the MECP that the flare would be run on an on/off basis due to gas quality. This notice is attached in Appendix C. Flare operations are now conducted in a manner to maximize run times while still achieving correct flare temperatures for proper greenhouse gas destruction.

The underlying cause for most of these trips is the low flow of LFG to the flare. A sufficient quantity (flow rate) of LFG is required to operate the flare as without sufficient flow the flare cannot maintain a consistent flame/temperature. At the same time, the quality of the gas (% CH₄) also needs to be maintained to support proper combustion. Quantity and quality of LFG are both required for proper flare operation but also directly impact one another when balancing the wellfield. Typically, quantity can be increased at the expense of lower quality LFG as is the case with the balancing at the OCWMF. The average flow to the enclosed flare dropped in 2025 relative to past years, largely due to declining gas quality and quantity in the current area of gas collection

3.0 2025 MONITORING SUMMARY

The LGCFS is monitored to ensure that the system is controlling LFG related odours at the site and reducing greenhouse gases. The LGCFS is also monitored to ensure that the system operates in compliance with the ECA (Air).

System monitoring was conducted in 2025 in accordance with the Maintenance and Monitoring Schedules attached in Appendix B. The results of the 2025 field monitoring are summarized in Table 3. Note that the December monitoring event was conducted while the temporary candlestick flare was in operation. Various repairs discussed further in this report were completed in October that helped improve flare runtime.

On a quarterly basis throughout 2025 water levels and well depths were measured as part of the monitoring round. The depth to bottom measurements for the wells were consistent throughout the year with most of the wells all retaining 80% or greater of their original installation depth. Depth to water varied throughout the quarters and seasons but was elevated above the bottom depth. Water levels can be used to calculate a percentage of available well screen compared to the well screen that was originally installed. For the first three quarters (Q1-Q3) of 2025, the wells on site had an average of 15%–20% available screen. In Q4, the number increased to an average of 26%. Taking water levels can be difficult due to the high moisture levels within in the well and foam that can be present in the well from leachate, but it can be used as a general indicator of water levels. As discussed in Section 2.2, the County has taken steps to reduce the leachate level on site, and this was expected to be observed in the water levels within the LFG wells. While the average LFG collection per well did increase as expected, the water levels in the LFG wells remain elevated. The elevated water levels within the LFG wells are likely due to the limited connectivity of the LFG wells to the leachate collection system. The results of the water level monitoring for 2025 are summarized in Table 4.

Based on the average annual flow rate at the plant (89 cfm), the 15 wells together result in an average flow of 5.9 cfm per well. However, individual flow calculations at each well shows a significant variation from the 5.9 cfm average, with typical flows ranging from non-detectable flows to approximately 40.6 cfm. This is typical of LFG collection and is a reflection of balancing wells to meet production in an individual area of a landfill. Variations can result due to differences in the local waste including saturation, waste composition, compaction, and pH, to name a few. The challenge in balancing a system is to try and maximize gas collection in a localized area without overdrawing.

Table 3: 2025 Monitoring Data Summary

		25-Jan-25	13-Feb-25	10-Mar-25	1-Apr-25	5-May-25	4-Jun-25	2-Jul-25	27-Aug-25	3-Sep-25	21-Oct-25	24-Nov-25	18-Dec-25	
Plant (Gauge and GEM)	Inlet Vac ("H2O))	-29.74	-43.69	-51.40	-18.85	-25.02	-25.35	-49.12	-47.82	-38.63	-34.21	-43.10	-55.34	
	Outlet Vac ("H2O)	0.36	0.46	0.59	0.53	0.53	0.51	0.71	0.49	0.46	0.40	0.10	3.35	
	CH4 (%)	52.2	48.1	52.8	57.6	50.4	46.9	40.1	36.7	43.0	41.1	46.1	37.6	
	CO2 (%)	34.3	32.8	34.7	31.3	31.6	32.2	30.4	32.4	32.8	31.9	33.8	27.5	
	O2 (%)	1.9	2.5	2.2	1.4	2.6	2.7	3.3	2.5	2.6	2.5	2.0	2.5	
	Flow	91	82	93	88	85	88	90	87	87	87	85	106	
	Comment	Flare Restarted Before Round	Flare running on arrival	Flare running on arrival. PDT 3 flooded and choking off flow to well 9	Flare restarted before monitoring round.	Flare restarted before monitoring round.	Flare restarted before monitoring round. PDT 2 had CA leak. CSE was completed on June 8th and PDT 2 is now repaired. Wells GW 11 and GW 15 have been raised and are too high to monitor this round.	Flare restarted before monitoring round. Gas readings at GW 11 and GW 15 were taken at the lateral port (can't reach well port).	Flare restarted before monitoring round. Gas readings at GW 11 and GW 15 were taken at the lateral port.	Flare restarted before monitoring round. Gas readings at GW 11, GW 15, and GW 17-H were taken at the lateral port.	Flare restarted before monitoring round. Gas at the flare was 33% CH4 and 6% O2 before the monitoring round. This increased to 41% CH4 and 2.5% O2 after the monitoring round.	restarted flare (final restart - mobile flare will be in commission the next day). Allowed flare to stabilize before monitoring.	Mobile flare was restarted several times during monitoring round.	
	GW 1-H	Well Vac ("H2O)	-24.26	-41.20	-48.26	-22.53	-18.57	-24.04	-42.44	-33.15	-32.58	-18.25	-38.60	-41.64
		Lat Vac ("H2O)	-24.50	-41.70	-48.40	-23.50	-18.30	-27.20	-42.50	-32.60	-32.60	-20.10	-39.49	-42.50
		CH4 (%)	49.20	54.10	57.30	57.80	64.10	59.80	56.1	53.1	53.1	50.4	49.2	39.1
CO2 (%)		31.50	35.30	35.50	32.20	34.10	37.80	33.4	36.5	33.8	34.8	34.5	25.5	
O2 (%)		2.40	0.80	1.10	2.20	0.10	0.50	1.2	1.2	1.8	3.5	2.1	5.5	
Max Velocity (m/s)		1.20	2.30	2.20	2.30	0.70	1.10	1.30	1.40	3.10	2.90	3.10	2.60	
Min Velocity (m/s)		1.10	2.10	2.10	2.10	0.60	1.00	1.30	1.30	2.80	2.70	3.00	2.40	
Temp (°C)		-14.10	-10.30	1.40	2.20	5.60	6.20	17.3	17.9	20.2	16.3	12.1	4.8	
Flow (cfm)		11.11	21.25	20.77	21.25	6.28	10.14	11.6	13.0	28.5	27.0	29.5	24.2	
Comments		1/4T	1/4T->1/2T	1/2T	1/2T	1/2T->3/4T	1T	1T	1T	1T	1.33T->3/4T	3/4T	3/4T->1/2T	
GW 2-H	Well Vac ("H2O)	3.91	4.43	0.32	-12.45	-8.85	1.88	0.27	0.65	-8.69	0.34	-0.25	-0.44	
	Lat Vac ("H2O)	-24.40	-42.10	-51.30	-23.40	-17.60	-26.80	-42.60	-30.90	-30.20	-19.00	-39.11	-39.10	
	CH4 (%)	59.60	61.80	63.80	40.10	14.20	53.80	64.5	62.9	46.7	58.1	43.4	11.6	
	CO2 (%)	36.10	35.50	35.70	23.60	4.70	29.90	33.1	36.3	28.0	38.5	33.9	7.8	
	O2 (%)	0.70	0.00	0.00	7.80	14.20	3.50	0.1	0.2	5.2	0.7	2.0	14.9	
	Max Velocity (m/s)	-	-	-	-	0.50	-	-	-	2.30	-	0.50	0.40	
	Min Velocity (m/s)	-	-	-	-	0.40	-	-	-	2.20	-	0.20	0.30	
	Temp (°C)	-	-	-	-	6.40	-	-	-	13.8	-	10.2	5.3	
	Flow (cfm)	-	-	-	-	4.35	-	-	-	21.74	-	-	3.38	
	Comments	closed	closed	closed	closed	closed	closed	closed->cracked	cracked	cracked->closed	closed	cracked	cracked->closed	
GW 3-1	Well Vac ("H2O)	-22.74	-41.98	-53.61	-21.86	-17.54	-7.95	-24.68	-24.32	-22.68	-0.65	0.67	1.05	
	Lat Vac ("H2O)	-23.00	-42.30	-53.40	-22.80	-17.10	-26.40	-42.30	-35.20	-33.50	-20.00	-39.51	-45.50	
	CH4 (%)	39.10	42.80	42.80	57.70	56.60	55.20	59.9	61.0	56.9	28.1	61.8	64.7	
	CO2 (%)	25.20	31.10	26.30	30.30	30.10	35.40	35.1	35.6	33.3	22.0	36.1	32.3	
	O2 (%)	3.50	2.70	6.70	2.30	2.40	2.50	0.7	0.7	1.2	10.7	0.0	0.4	
	Max Velocity (m/s)	1.50	1.90	3.30	3.50	0.60	0.90	0.70	0.90	0.90	0.70	-	-	
	Min Velocity (m/s)	1.40	1.70	3.20	3.40	0.50	0.80	0.50	0.80	0.60	0.50	-	-	
	Temp (°C)	-9.20	-10.50	2.20	3.10	8.10	8.60	18.9	19.2	20.4	17.2	-	-	
	Flow (cfm)	14.01	17.39	31.40	33.33	5.31	8.21	5.80	8.21	7.25	5.80	-	-	
	Comments	2.25T	2.25T	2.25T->2T	2T	2T	1/2T	1/2T	1/2T	1/2->1T	cracked -> closed	closed	closed	
GW 4	Well Vac ("H2O)	-22.43	-38.27	-46.37	-20.67	-18.89	-22.73	-38.01	-35.96	-29.45	-18.88	-33.10	-31.14	
	Lat Vac ("H2O)	-24.50	-41.70	-48.70	-22.10	-19.20	-26.20	-39.00	-37.30	-35.50	-21.00	-33.72	-33.20	
	CH4 (%)	41.10	43.90	48.30	56.80	61.50	55.80	46.6	36.6	53.5	45.4	58.0	34.1	
	CO2 (%)	29.40	34.50	34.60	33.10	35.30	38.10	34.3	32.4	35.6	34.9	37.0	25.9	
	O2 (%)	2.00	0.20	1.30	1.30	0.00	0.60	0.6	1.5	0.6	2.1	0.1	3.6	
	Max Velocity (m/s)	0.50	0.50	0.60	0.60	1.30	1.70	1.9	1.6	2.5	2.5	2.5	2.2	
	Min Velocity (m/s)	0.40	0.40	0.40	0.50	1.20	1.60	1.7	1.4	2.3	2.3	2.5	2.0	
	Temp (°C)	-13.50	-10.50	1.80	2.20	8.60	9.20	19.3	19.0	19.3	12.1	9.8	3.9	
	Flow (cfm)	4.35	4.35	4.35	5.31	12.08	15.94	17.39	14.49	23.18	23.18	24.15	20.29	
	Comments	1/2T	1/2T	1/2T	1/2T	1/2T	1/2T	1/2T	1/2T	1/2->1T	1.33T->1T	1T	1T->3/4T	
GW 5	Well Vac ("H2O)	Unable to remove cap. Used a wrench and it slips off.	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	
	Lat Vac ("H2O)													
	CH4 (%)													
	CO2 (%)	Well should be lowered.												
	O2 (%)													
	Max Velocity (m/s)													
	Min Velocity (m/s)	Disconnected from Big O												
	Temp (°C)													
	Flow (cfm)													
	Comments													
GW 6	Well Vac ("H2O)	0.96	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	
	Lat Vac ("H2O)	-25.30												
	CH4 (%)	55.80												
	CO2 (%)	31.00												
	O2 (%)	3.70												
	Max Velocity (m/s)	-												
	Min Velocity (m/s)	-												
	Temp (°C)	-												
	Flow (cfm)	-												
	Comments	closed												

Table 3: 2025 Monitoring Data Summary

GW 7	Well Vac ("H2O)	-24.42	-40.10	-41.48	-23.85	-23.60	-22.31	-42.1	-37.4	-38.2	-19.5	-33.8	-21.8
	Lat Vac ("H2O)	-24.60	-40.50	-41.40	-24.50	-23.40	-25.20	-42.3	-38.5	-38.9	-21.4	-33.6	-22.2
	CH4 (%)	49.50	58.40	56.80	59.10	61.10	53.20	56.0	44.8	57.4	55.2	59.6	58.8
	CO2 (%)	33.30	36.40	35.70	34.80	36.70	34.60	34.2	31.2	36.5	38.1	39.0	34.6
	O2 (%)	1.50	0.20	1.20	0.30	0.00	1.90	1.6	3.1	0.4	0.2	0.0	0.5
	Max Velocity (m/s)	2.10	3.20	0.60	0.70	1.50	1.80	1.7	1.7	3.2	3.3	3.1	3.0
	Min Velocity (m/s)	1.90	3.00	0.50	0.60	1.40	1.70	1.6	1.6	3.1	3.1	3.0	2.9
	Temp (°C)	-13.80	-9.90	4.40	5.10	9.20	12.30	17.8	17.7	21.6	17.0	10.2	4.2
	Flow (cfm)	19.32	29.95	5.31	6.28	14.01	16.91	15.94	15.94	30.43	30.91	29.46	28.50
	Comments	6T	6T->6.25T	6.25T	6.25T->6.5T	6.5T	6.5T	6.5->6.75	6.75T->6.5T	6.5->7T	7T	7T	7T
GW 8-H	Well Vac ("H2O)	-25.02	-42.48	-51.55	-21.21	-19.91	-22.95	-34.55	-46.92	-38.31	-32.06	-33.88	-51.31
	Lat Vac ("H2O)	-25.30	-42.30	-51.20	-21.30	-19.30	-26.00	-34.10	-48.60	-40.30	-34.00	-33.60	-52.30
	CH4 (%)	51.20	58.90	59.70	57.70	52.90	58.40	60.70	46.30	54.00	45.80	52.70	45.00
	CO2 (%)	36.10	38.40	38.50	32.90	31.30	39.80	36.70	37.20	38.80	33.50	33.80	31.10
	O2 (%)	0.90	2.70	0.50	2.10	1.80	0.20	0.20	2.00	0.70	4.80	2.90	1.30
	Max Velocity (m/s)	3.00	2.70	2.70	2.80	2.00	1.90	2.00	2.10	0.70	0.70	0.90	0.90
	Min Velocity (m/s)	2.80	2.40	2.60	2.60	0.80	2.70	1.80	2.00	0.50	0.50	0.80	0.70
	Temp (°C)	-12.60	-10.70	1.10	2.50	8.30	12.50	19.00	20.50	27.30	13.30	9.30	3.10
	Flow (cfm)	28.02	24.63	25.60	26.08	8.69	17.39	18.35	19.80	5.80	5.80	8.21	7.73
	Comments	1.5T	1.5T	1.5T->1.75T	1.75T	1.75T	8.5T	8.5T	8.5T	8.5->9T	9T->8T	8T	8T
GW 9-2	Well Vac ("H2O)	-0.25	-13.83	-1.63	-24.04	-18.22	-19.86	-38.27	-2.59	-0.76	-0.15	0.17	0.62
	Lat Vac ("H2O)	-15.30	-18.20	-2.00	-26.70	-20.10	-25.10	-42.60	-43.60	-41.60	-29.70	-36.99	-37.80
	CH4 (%)	58.20	53.20	60.30	58.50	59.20	52.90	37.90	33.10	50.70	24.00	58.40	60.60
	CO2 (%)	37.80	37.10	39.60	34.30	35.00	38.10	29.30	24.00	37.30	17.80	39.40	38.50
	O2 (%)	0.90	0.60	0.00	0.50	0.00	0.70	3.80	8.90	3.00	13.00	0.00	0.10
	Max Velocity (m/s)	0.90	1.70	1.00	1.20	1.20	1.40	1.50	1.60	1.50	1.60	-	-
	Min Velocity (m/s)	0.80	1.40	0.80	1.00	1.10	1.30	1.40	1.40	1.40	1.50	-	-
	Temp (°C)	-14.20	-7.40	0.90	1.50	8.50	13.40	19.80	18.80	26.80	14.40	-	-
	Flow (cfm)	8.21	14.97	8.69	10.63	11.11	13.04	14.01	14.49	14.01	14.97	-	-
	Comments	->cracked (very high pre	cracked->1/4T	1/4T	1/4->1/2T	1/2T	1/2T	1/2->1/4T	1/4->cracked	cracked	cracked->closed	closed	closed
GW 10-H	Well Vac ("H2O)	-25.46	-35.87	-38.83	-25.94	-20.87	-19.86	-41.63	-41.46	-40.56	-20.55	0.11	1.49
	Lat Vac ("H2O)	-25.80	-36.10	-38.70	-26.40	-20.80	-25.10	-42.50	-43.10	-42.30	-24.50	-37.02	-44.30
	CH4 (%)	51.00	57.40	42.50	58.90	60.90	52.90	55.50	38.40	48.90	6.80	57.70	60.30
	CO2 (%)	32.20	37.70	29.20	35.30	36.00	38.10	37.00	31.60	36.30	5.90	40.70	38.00
	O2 (%)	0.80	0.30	5.10	0.60	0.00	0.70	1.40	5.40	3.30	20.30	0.00	0.20
	Max Velocity (m/s)	1.20	1.30	0.50	0.80	1.00	0.90	0.60	0.40	0.70	0.70	-	-
	Min Velocity (m/s)	1.00	1.10	0.40	0.60	0.90	0.80	0.40	0.30	0.50	0.50	-	-
	Temp (°C)	-13.90	-8.90	1.90	3.10	10.60	14.70	18.30	18.10	26.20	12.10	-	-
	Flow (cfm)	10.63	11.59	4.35	6.76	9.18	8.21	4.83	3.38	5.80	5.80	-	-
	Comments	3/4T	3/4T->1T	1T-3/4T	3/4->1T	1T->1.25T	1.25T	1.25T	1.25->1T	1T	1.33T->cracked	closed	closed
GW 11	Well Vac ("H2O)	-25.12	-34.35	-23.37	-23.88	-23.37	Can't Reach	Can't Reach	Can't Reach	Can't Reach	-17.81	-34.35	-26.71
	Lat Vac ("H2O)	-25.30	-34.50	-40.50	-24.60	-23.30	Well Raised	-41.78	-39.13	-37.79	-21.20	-34.07	-27.10
	CH4 (%)	51.40	57.60	55.00	50.90	57.00	-	41.40	54.60	59.60	51.40	42.80	46.10
	CO2 (%)	32.90	35.80	34.90	29.00	32.50	-	25.10	35.60	37.00	36.00	31.50	30.60
	O2 (%)	0.80	0.90	2.20	4.70	1.40	-	7.00	2.50	0.10	3.00	5.80	6.70
	Max Velocity (m/s)	0.90	1.10	1.40	1.70	0.60	-	0.80	0.80	1.80	1.60	1.50	1.50
	Min Velocity (m/s)	0.80	0.90	1.20	1.50	0.40	-	0.70	0.70	1.60	1.40	1.40	1.30
	Temp (°C)	-9.50	-9.10	3.10	4.40	10.40	-	19.10	19.40	20.60	15.70	10.30	4.30
	Flow (cfm)	8.21	9.66	12.56	15.46	4.83	-	7.25	7.25	16.42	14.49	14.01	13.52
	Comments	1.25T	1.25T	1.25T->1T	1T->3/4T	3/4T	-	Can't Reach	Can't Reach	Can't Reach	Can't Reach	2.66T->2T	2T
GW 12	Well Vac ("H2O)	2.85	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed	Decommed
	Lat Vac ("H2O)	-	-	-	-	-	-	-	-	-	-	-	-
	CH4 (%)	63.40	-	-	-	-	-	-	-	-	-	-	-
	CO2 (%)	33.80	-	-	-	-	-	-	-	-	-	-	-
	O2 (%)	0.10	-	-	-	-	-	-	-	-	-	-	-
	Max Velocity (m/s)	-	-	-	-	-	-	-	-	-	-	-	-
	Min Velocity (m/s)	Disconnected	-	-	-	-	-	-	-	-	-	-	-
	Temp (°C)	from Big O	-	-	-	-	-	-	-	-	-	-	-
	Flow (cfm)	-	-	-	-	-	-	-	-	-	-	-	-
	Comments	closed	-	-	-	-	-	-	-	-	-	-	-

Table 3: 2025 Monitoring Data Summary

GW 13-H	Well Vac ("H2O)	-24.43	-35.35	-37.32	-24.15	-20.62	-21.93	-41.41	-41.11	-45.19	-21.58	-35.95	-25.45
	Lat Vac ("H2O)	-24.50	-36.10	-37.30	-24.60	-20.40	-24.60	-42.30	-43.00	-47.40	-23.70	-36.36	-26.20
	CH4 (%)	42.20	35.20	57.00	56.50	52.30	41.40	39.10	31.50	37.00	37.00	48.10	34.20
	CO2 (%)	30.40	38.60	38.20	35.80	33.60	32.50	32.30	31.50	30.80	33.80	36.20	29.10
	O2 (%)	0.80	0.70	0.70	0.30	0.50	1.30	0.40	1.20	1.50	1.20	0.10	0.40
	Max Velocity (m/s)	3.40	3.20	2.30	2.80	3.80	3.90	3.50	3.30	3.10	3.30	3.20	2.90
	Min Velocity (m/s)	3.10	2.80	1.80	2.70	3.60	3.70	3.30	3.10	2.80	3.10	3.00	2.70
	Temp (°C)	-11.60	-9.70	4.10	5.20	8.70	14.90	20.10	21.40	26.30	16.30	10.20	3.80
	Flow (cfm)	31.40	28.98	19.80	26.57	35.74	36.71	32.85	30.91	28.50	30.91	29.95	27.05
	Comments	3.5T	3.5T	3.5T->3.75T	3.75T	3.75T	4.5T	4.5T	4.5T	4.5T	4.5T	4.5T	4.5T
GW 14	Well Vac ("H2O)	-19.74	-34.40	-39.72	-23.19	-23.52	19.86	9.24	-7.95	10.14	-3.34	-36.70	-27.05
	Lat Vac ("H2O)	-25.00	-36.50	-40.20	-24.70	-23.50	-25.30	-42.70	-40.50	-38.40	22.00	-36.71	-27.50
	CH4 (%)	52.10	46.70	54.00	49.80	39.70	64.20	65.30	40.50	62.10	53.30	36.10	55.80
	CO2 (%)	34.20	27.60	32.00	29.10	20.90	35.30	32.70	24.80	34.80	34.20	25.30	33.50
	O2 (%)	0.20	4.70	1.80	3.80	8.70	0.10	0.00	6.90	0.00	4.00	9.30	2.90
	Max Velocity (m/s)	0.50	0.50	1.20	1.10	0.80	1.30	1.20	1.40	0.60	0.50	1.20	1.40
	Min Velocity (m/s)	0.40	0.40	1.00	1.00	0.70	1.20	1.10	1.30	0.50	0.40	1.00	1.30
	Temp (°C)	-9.90	-10.70	2.80	3.10	9.30	12.20	17.80	18.20	21.70	16.20	7.60	4.10
	Flow (cfm)	4.35	4.35	10.63	10.14	7.25	12.08	11.11	13.04	5.31	4.35	10.63	13.04
	Comments	cracked	cracked	cracked	cracked	cracked->closed	closed->cracked	cracked->1/4T	1/4->cracked	cracked->3/4T	1/2T->cracked	cracked	1T
GW 15	Well Vac ("H2O)	-10.18	-30.96	-32.49	-12.45	-12.15	Can't Reach	Can't Reach	Can't Reach	Can't Reach	-19.86	-26.36	-25.43
	Lat Vac ("H2O)	-24.10	-36.60	-38.00	-24.60	-22.90	Well Raised	-42.06	-39.16	-37.63	-22.00	-34.93	-33.20
	CH4 (%)	28.50	39.70	41.90	55.10	-	-	43.00	49.90	52.40	54.90	41.50	41.50
	CO2 (%)	24.90	31.70	31.40	28.10	34.00	-	31.20	38.00	35.00	37.60	36.00	28.00
	O2 (%)	0.80	0.00	2.70	3.10	1.10	-	3.80	0.20	2.50	1.70	1.90	6.60
	Max Velocity (m/s)	1.70	1.40	1.90	1.80	1.10	-	1.40	1.70	2.90	2.70	2.80	2.90
	Min Velocity (m/s)	1.40	1.10	1.80	1.70	1.00	-	1.30	1.50	2.80	2.50	2.50	2.70
	Temp (°C)	-12.90	-10.20	2.60	2.40	7.50	-	16.80	16.30	21.60	14.60	8.60	3.20
	Flow (cfm)	14.97	12.08	17.87	16.91	10.14	-	13.04	15.46	27.53	25.12	25.60	27.05
	Comments	1/4T	1/4T	1/4T->cracked	cracked	cracked	-	Can't Reach	Can't Reach	Can't Reach	1/2T	1/2T	1/2T->1/4T
GW 16-3	Well Vac ("H2O)	Unable to remove	-2.03	-2.37	0.63	1.22	0.54	-0.24	0.02	0.16	-2.57	-1.84	-1.64
	Lat Vac ("H2O)	cap. Used a wrench and it slips off.	-36.40	-37.80	-25.60	-21.90	-25.20	-42.50	-38.60	-43.50	-23.60	-35.81	-38.00
	CH4 (%)	7.30	0.00	58.40	30.80	21.90	16.30	42.10	40.70	53.70	56.40	56.00	
	CO2 (%)	1.00	0.00	34.40	27.40	25.60	10.30	27.10	27.10	37.30	36.10	36.00	
	O2 (%)	lowered.	19.90	23.20	0.10	0.40	1.50	14.60	3.70	4.00	1.20	1.40	0.50
	Max Velocity (m/s)	-	-	-	-	-	-	-	-	-	1.30	1.50	1.40
	Min Velocity (m/s)	-	-	-	-	1.10	-	-	-	-	1.10	1.30	1.30
	Temp (°C)	-	-	-	-	8.30	-	-	-	-	13.50	8.90	3.80
	Flow (cfm)	-	-	-	-	11.11	-	-	-	-	11.59	13.52	13.04
	Comments	closed	closed	closed	closed	closed	closed	closed	closed	closed	cracked	cracked	cracked
GW 17-H	Well Vac ("H2O)	-24.41	-35.65	-37.63	-24.93	-21.61	-22.15	-41.43	-40.75	Can't Reach	-20.58	-35.89	-35.27
	Lat Vac ("H2O)	-25.00	-36.40	-38.00	-25.80	-21.60	-25.30	-42.40	-42.50	-35.62	-22.70	0.40	-36.10
	CH4 (%)	50.20	49.10	60.10	61.60	57.70	54.80	48.90	43.10	50.30	53.30	54.80	55.40
	CO2 (%)	29.50	30.90	37.10	34.00	34.40	36.30	34.80	35.20	36.90	40.00	39.60	36.30
	O2 (%)	0.50	3.60	0.10	0.00	0.00	0.10	0.90	1.80	0.20	0.30	0.00	0.70
	Max Velocity (m/s)	1.50	1.40	2.00	2.20	0.50	0.90	0.90	1.00	4.30	4.00	3.80	3.80
	Min Velocity (m/s)	1.30	1.20	1.90	2.00	0.40	0.80	0.80	0.80	4.10	3.80	3.50	3.60
	Temp (°C)	-11.10	-8.60	2.40	3.50	8.70	13.10	19.50	18.40	25.00	17.60	10.10	3.70
	Flow (cfm)	13.52	12.56	18.84	20.29	4.35	8.21	8.21	8.69	40.57	37.68	35.26	35.74
	Comments	3/4T	3/4T	3/4T->1T	1T->1.25T	1.25T	1.25T	1.25->1.5T	1.5T	Can't Reach	1.66T	1.57T	1.66T
GW 18-4	Well Vac ("H2O)	-24.07	-36.07	-37.23	-27.23	-21.59	-22.12	-41.98	-41.44	-36.26	-20.25	-35.28	-37.61
	Lat Vac ("H2O)	-24.10	-36.30	-37.10	-27.30	-21.50	-25.10	-42.40	-42.60	-37.40	-22.10	-34.83	-37.80
	CH4 (%)	52.10	56.40	60.30	61.10	62.00	59.70	53.90	50.70	53.40	54.30	55.80	46.00
	CO2 (%)	30.90	36.00	37.30	34.30	35.60	39.40	33.30	37.60	34.80	35.90	36.10	29.30
	O2 (%)	1.20	0.80	0.70	0.10	0.00	0.10	2.40	1.60	1.20	2.80	0.20	2.00
	Max Velocity (m/s)	1.20	1.30	1.60	1.80	1.30	1.60	1.70	1.80	0.80	0.90	1.10	1.30
	Min Velocity (m/s)	1.10	1.00	1.50	1.70	1.20	1.40	1.50	1.60	0.70	0.70	1.00	1.10
	Temp (°C)	-13.60	-10.90	3.00	4.20	8.30	12.90	20.80	20.20	22.70	17.00	10.70	4.00
	Flow (cfm)	11.11	11.11	14.97	16.91	12.08	14.49	15.46	16.42	7.25	7.73	10.14	11.59
	Comments	1T	1T->1.25T	1.25T->1.5T	1.5T->1.75T	1.75T->2T	4T	4T	4T	4T	4T->3T	3T	3T
PDT (cycles)	PDT1	175784	176224	177521	178214	179204	179656	179976	180106	180106	180110	180114	
	PDT2	1480	1480	1511	1561	1568	1573	1857	2042	2055	2059	2063	
	PDT3	71136	71136	71137	75108	80237	83523	85720	87657	87722	88180	88644	
	PDT4	712488	712502	712528	712558	712589	712634	712642	712693	712695	712709	712714	
	Cond. Chamber	547563	549051	554936	561300	565107	566117	566745	569722	570093	571351	573990	
	Total cycles since last round	3529	1942	11108	9964	4964	3271	5280	438	438	3116	1863	
	Approximate volume	7763.8	4272.4	15928	24437.6	21920.8	10920.8	7196.2	11616	963.6	3834.6	6855.2	

Table 4: 2025 Water Levels

Water Levels - Oxford County

				10-Mar-25				06-Jun-25				03-Sep-25				18-Dec-25			
	Installed (m)	Screen (m) *	Riser to ground surface	DTW (m)	DTB (m)*	Amount Leachate (m)	% Open Screen	DTW (m)	DTB (m)*	Amount Leachate (m)	% Open Screen	DTW (m)	DTB (m)*	Amount Leachate (m)	% Open Screen	DTW (m)	DTB (m)*	Amount Leachate (m)	% Open Screen
GW 1-H	13.26	10.21	3.05	3.01	10.89	7.88	0	3.47	10.94	7.47	4	3.52	10.88	7.36	4	5.45	10.92	5.47	22
GW 2-H	15.24	12.19	3.05	4.39	12.63	8.24	11	3.66	12.78	9.12	5	4.74	12.51	7.77	14	5.87	12.23	6.36	23
GW 3-1	8.94	5.89	3.05	5.26	8.06	2.80	27	5.62	8.02	2.40	32	5.79	8.18	2.39	33	6.01	8.08	2.07	37
GW 4	16.76	13.72	3.05	5.01	11.53	6.52	17	5.85	11.86	6.01	24	5.03	11.59	6.56	17	6.12	11.71	5.59	26
GW 5	10.67	7.62	3.05																
GW 6	13.11	10.06	3.05																
GW 7	16.76	13.72	3.05	5.21	12.99	7.78	17	5.57	12.90	7.33	20	5.05	12.72	7.67	16	5.56	12.76	7.20	20
GW 8-H	10.54	7.49	3.05	3.92	6.54	2.62	13	4.19	6.67	2.48	17	4.26	6.82	2.56	18	5.03	6.70	1.67	30
GW 9-2	8.94	5.89	3.05	5.08	6.84	1.76	30	5.20	6.55	1.35	33	5.58	6.75	1.17	37	6.08	6.73	0.65	45
GW 10-H	12.07	9.02	3.05	2.92	5.86	2.94	-2	2.13	5.64	3.51	-16	2.73	5.75	3.02	-6	3.79	5.71	1.92	13
GW 11	13.72	10.67	3.05	4.95	8.84	3.89	21	Can't Reach	Can't Reach	-	-	Can't Reach	-	-	-	5.42	8.66	3.24	27
GW 12	13.72	10.67	3.05																
GW 13-H	10.21	7.16	3.05	3.94	9.45	5.51	9	8.68	9.50	0.82	59	8.13	9.50	1.37	53	8.33	9.52	1.19	55
GW 14	14.99	11.94	3.05	2.77	13.85	11.08	-2	5.20	13.55	8.35	16	5.69	15.07	9.38	18	5.95	14.89	8.94	19
GW 15	14.88	6.71	3.05	4.86	13.32	8.46	14	Can't Reach	Can't Reach	-	-	Can't Reach	-	-	-	5.43	13.30	7.87	18
GW 16-3	9.75	6.71	3.05	5.87	9.48	3.61	30	4.51	9.60	5.09	15	4.03	9.59	5.56	10	5.23	9.68	4.45	23
GW 17-H	13.72	10.67	3.05	5.08	13.34	8.26	15	4.66	13.84	9.18	12	Can't Reach	-	-	-	5.29	13.67	8.38	16
GW 18-4	10.52	7.47	3.05	4.90	8.89	3.99	21	5.22	9.06	3.84	24	3.56	8.75	5.19	6	4.86	8.71	3.85	21

4.0 2025 MAINTENANCE SUMMARY

In 2025, system maintenance was conducted in accordance with the Maintenance and Monitoring Schedule attached in Appendix B. The Maintenance Schedule was developed in accordance with the manufacturers' recommendations for preventative maintenance. These schedules outline the work and frequency of the tasks required for all components of the system. Any potential problems observed while conducting the routine maintenance were addressed in a timely manner. This schedule was originally published in the Operating Procedures and Maintenance Program Manual for the LGCFS created during plant construction.

The maintenance program for the LGCFS consists of three major parts: the Landfill Gas Wellfield System, the Mechanical System, and the Flare and Control System. The following sections summarize the maintenance completed on these individual components.

4.1 Wellfield System

All activities outlined in the Operation and Maintenance schedules were carried out as recommended. Various other wellfield system activities occurred throughout 2025 and are further described below.

With the gas collection system having temporary Big O drainage tile type piping connections above ground, the system is susceptible to wind and freezing. During high wind conditions, the Big O piping is often blown apart, and the system shuts down on a high oxygen alarm. In addition to wind being problematic with the temporary piping, cold temperatures can also be a problem. When the moist warm gas comes above ground into this piping, condensate forms and can often block the pipe and freeze solid. The piping has to be drained or replaced depending on temperature conditions.

Notable updates to the Big-O piping occurred in 2025. On January 8, 2025, the Big-O piping was removed from wells GW5, GW7, and GW12 to accommodate filling operations in this area. Taking GW7 offline resulted in a notable change to gas quantity at the flare, and on January 13 new Big-O piping was installed and rerouted on site to allow for gas collection from this well and filling in the area. Additionally, on February 6, Big-O piping was removed and well GW6 was disconnected. Gas wells 5, 6, and 12 were historically closed due to poor gas and did not have an adverse effect on flare operation being offline. Therefore, these wells were permanently decommissioned to allow for ease of filling in the area.

In May of 2025, the remaining wells connected with Big-O piping were raised prior to adjacent filling taking place. Raising the wells allows for them to remain above grade and accessible after additional waste has been placed; however, the additional height prior to the waste being placed can prove challenging during monitoring activities. Well GW17-H was also raised later in the year on August 27, 2025.

Repairs to the Big-O piping occurred throughout the year as new cracks and leaks in the above grade piping caused an increase in the oxygen at the flare. In October, high oxygen levels were observed at the flare, but the initial cause could not be located. During a subsequent visit, it was

found that well GW10-H was the cause of the high oxygen levels and the well was then closed due to poor gas quality. It currently remains closed but will continue to be monitored and re-opened if the gas quality improves.

In 2024, the pump within the condensate chamber was removed, inspected, and reinstalled as it would periodically stop pumping. Comcor continued to monitor the pump in 2025 and did not observe any further issues with this pump.

The goal of the gas collection system is to maximize gas collection, minimize odours, and reduce greenhouse gas emissions. With this in mind, the individual wells are adjusted to maximize flow and maintain a sustainable gas concentration for the flare to operate within the standards outlined in the ECA (Air). Wells with gas below 35% methane are closed or throttled until a sustainable production level is reached. Wells with approximately 50% are opened over consecutive monitoring events until a sustainable production level is reached. The actions taken during each monitoring round can be seen in Table 3: 2025 Field Monitoring Data.

4.2 Mechanical System

All activities outlined in the Operation and Maintenance schedules were carried out as recommended. Additionally, the LFGU project began in 2025 and is expected to be completed in early 2026. As previously mentioned, the scope of this project includes the replacement of the electrical shed and the equipment housed within. Further details can be found in the associated design report dated November 6, 2025.

In recent years, the air compressor at the OCWMF had begun to require additional maintenance and was prone to periodic shutdowns. An overhaul occurred in 2024 to further extend the life of the air compressor through 2025 while a replacement was included in the scope of the LFGU project. Similarly, the gas analyzer has required a notable amount of maintenance in recent years. From approximately May to July of 2025, the analyzer had encountered a fault as the diaphragm pump required replacement. The analyzer could continue to function during this time while the parts were ordered and then installed.

As part of the Operation and Maintenance schedule, Comcor completes visual inspections of the flare including the burner tips, insulation, paint, concrete, and ladder safety rail. These visual inspections help determine when any additional maintenance may be required. Rust spots on the flare were first observed in August 2024 but were deemed to not require any immediate action. No additional items were noted during the visual inspections completed throughout 2025.

4.3 Flare and Control System

Throughout the year, the controls computer continually logged all control information during flaring operations including gas concentrations, flare temperatures, and runtimes. On occasion, there were minor repairs or maintenance required due to improperly operating valves, gauges (knock out pot), sensors (i.e. heat trace, oxygen, carbon dioxide), and various errors/faults/failures (i.e. analyzer, pilot flame, purge blower). The computer and controls system are included within the LFGU project with the goal to upgrade the aging system. This will bring the controls system up to current standards and ensure parts availability for any future maintenance that may be

required. Additionally, the new system will now be able to utilize the three-phase power that was brought to site by the County.

Additional maintenance to the enclosed flare beyond the activities outlined in the Maintenance and Monitoring Schedule were minimal in 2025. The existing flare modifications remain in effect to help maintain runtimes at low LFG flow rates. In May, it was noted that the lower thermocouple had stopped functioning correctly. This thermocouple was then replaced by Comcor during a following visit on site.

To maintain the gas analyzer, the H₂S scrubber beads were replaced as required and quarterly service and calibration was performed by Novatech. As previously discussed, the diaphragm pump was repaired in July 2025 during the quarterly service and calibration.

5.0 CAPITAL PROJECTS AND REGULATORY UPDATES

5.1 Landfill Gas Facility Upgrades

The LGFU project began construction in 2025 and aims to replace several pieces of aging equipment at the facility. In addition, the project will utilize the three-phase power now available at the OCWMF and replace the electrical shed that houses the equipment. The major components of the upgrades project are summarized below:

- Containerized electrical building
- Air compressor
- Gas analyzer
- Controls system
- VFD retrofit

To maintain operation of the LGCFS during the construction phased of the LFGU project, a temporary candlestick flare began operation on November 25, 2025. Once the new containerized building is fully commissioned the enclosed flare will resume operation.

It is expected that the LFGU project will reduce the number of outages related to the air compressor and gas analyzer. While not the leading cause of outages in 2025, the air compressor and gas analyzer related outages accounted for 33.1% of all outages throughout 2025.

5.2 Phase 2 Wellfield Expansion

In 2024, several areas of the OCWMF approaching final contours were identified. To add additional coverage to these areas the process of expanding the collection system began. In June 2024, Comcor, on behalf of Oxford County, applied for an amendment to ECA No. A070808 to expand the LGCFS. Approval was then granted on May 16, 2025, and includes the remaining build out, termed Phase 2, of the collection system for the current North Fill Area.

Phase 2 is set to occur through several projects as the final contours on site area are achieved, the first of which began in 2025 is denoted with the name Phase 2-1. This project is expected to be constructed in 2026 and will add wellfield coverage in areas of the landfill with recent filling. The

additional wellfield coverage is anticipated to increase the overall LFG recovery rate on site, providing more LFG to the enclosed flare. As low LFG flow has been a factor in the flare shutdowns related to flare flameouts, increased gas flow should improve flare runtimes and reduce the frequency of restarts.

5.3 Landfill Methane Regulation

The new federal landfill methane regulations came into force on December 12, 2025. The regulation applies to landfills across Canada and will include the OCWMF. Initial requirements under the regulation include the use of the Environment and Climate Change Canada (ECCC) Landfill Methane Modeling Tool to complete an initial assessment by June 10, 2026. Compliance obligations are phased depending on the outcome of the methane generation assessment with the earliest compliance date being January 1, 2028.

The compliance obligations will include LFG recovery and monitoring and methane leak detection and repair. One aspect of methane leak detection will be the obligation to complete surface emission monitoring (SEM) three times per year in accordance with the regulation. Notably the regulation defines a leak as a concentration greater than 500 ppmv, an exceedance as 500 ppmv at any single location, and an average concentration of 25 ppmv in a zone of 4,500 m². Any exceedances observed during the SEMs will then need to be addressed within six months and re-monitored to confirm that the exceedance has been addressed. It is expected that SEM events will occur in 2026 and 2027. These results can then be utilized to help identify and address potential exceedances prior to the compliance obligations timeline.

6.0 CONCLUSIONS AND RECOMMENDATIONS

1. Although there is declining gas quantity/quality in the existing wellfield area, the LGCFS operated as intended in 2025.
2. The monitoring and maintenance schedule should be continued in order to maintain collection of LFG and safe operation of the LGCFS. The system also must be monitored and maintained in order to remain in compliance with regulatory agency approvals.
3. The phased wellfield expansions should continue to be prioritized to increase the LFG collection rate and reduce fugitive emissions. This includes the replacement of temporary above grade piping with permanent buried HDPE piping. Increased collection rates will help maintain consistent flare operation.
4. Landfilling operations should focus on completing sections of the landfill to final contours where possible to align with the installation of the wellfield expansions and allow for the placement of final cover.

All of which is Respectfully Submitted,

COMCOR ENVIRONMENTAL LIMITED



Ian Censner
Engineering Project Coordinator



Luxon Burgess, CET, LET
Supervisor, Wellfield Operations

APPENDIX A

Ministry of the Environment, Conservation and Parks Environmental Compliance Approval
(Waste) No. A070808

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A070808

Issue Date: May 16, 2025

County of Oxford
21 Reeve St
Woodstock, Ontario
N4S 7Y3

Site Location: Oxford County Waste Management Facility
Lot 11 & 12, Concession 2
South-West Oxford Township, Restructured County of Oxford

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

*the use and operation of a **43.7 hectare** (108 acre) Waste Fill Area within a total Site area of **89.44 hectares** (221 acres)*

For the purpose of this environmental compliance approval, the following definitions apply:

"Approval" means this Environmental Compliance Approval No. A070808, including all items, conditions and Schedules attached to and forming part of this Approval, as amended by the Director;

"Director" means any Ministry employee appointed in writing by the Minister pursuant to Section 5 of the EPA as a Director for the purpose of Part II.1 of the EPA;

"District Manager" means the District Manager of the local district office of the Ministry in which the Site is geographically located;

"EPA" means Environmental Protection Act, R.S.O. 1990, c. E. 19, as amended;

"Ministry" or "MECP" means the Ontario Ministry of the Environment, Conservation and Parks;

"Operator " means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the Site and includes its successors or assigns;

"Owner" means any person that is responsible for the establishment or operation of the Site being approved by this Approval, and includes the County of Oxford, its successors and assigns;

"OWRA" means the Ontario Water Resources Act, R.S.O. 1990, C. O.40, as amended;

"PA" means the Pesticides Act, R.S.O. 1990, c. P-11, as amended;

"Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to Section 5 of the OWRA or Section 5 of the EPA or section 17 of PA;

"Regulation 347" or "Reg. 347" means Regulation 347, R.R.O. 1990, made under the EPA, as amended;

"Site" or "Facility" means the entire waste disposal site, including the waste fill Area, the buffer lands/contaminant attenuation zone, and all the operations approved by the Approval, as amended and located at part of Lot 11 & 12, Concession 2, South-West Oxford Township, Restructured County of Oxford, known as Salford and or Oxford Landfill; and

"Trained personnel" means personnel knowledgeable in the following through instruction and/or practice:

- relevant waste management legislation, regulations and guidelines;
- major environmental concerns pertaining to the waste to be handled;
- occupational health and safety concerns pertaining to the processes and wastes to be handled;
- management procedures including the use and operation of equipment for the processes and wastes to be handled;
- emergency response procedures;
- specific written procedures for the control of nuisance conditions;
- specific written procedures for refusal of unacceptable waste loads; and
- the requirements of the Approval.

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1.0 GENERAL

Compliance

1.1 The Owner/Operator shall ensure compliance with all the conditions of this Approval and shall ensure that any person authorized to carry out work on or operate any aspect of the Site/System is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same. Any non-compliance constitutes a violation of the EPA, R.S.O. 1990 and is grounds for enforcement.

In Accordance

1.2 Except as otherwise provided for in this Approval, the Site shall be designed, developed, used, operated and maintained, and all facilities, equipment and fixtures shall be built and installed, in accordance with the documentation listed in the attached Schedule "A" and the terms and conditions of this Approval.

1.3 The requirements specified in this Approval are the requirements under the EPA, R.S.O. 1990. The issuance of this Approval in no way abrogates the Owner's legal obligations to take all reasonable steps to avoid violating other applicable provisions of this legislation and other legislation and regulations.

Interpretation

- 1.4 (a) Where there is a conflict between a provision of any document, including the application, referred to in Schedule "A" of this Approval, and the conditions of this Approval, the conditions in this Approval shall take precedence.
- (b) Where there is a conflict between the application and a provision in any documents listed in Schedule "A", the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
- (c) Where there is a conflict between any two documents listed in Schedule "A", other than the application, the document bearing the most recent date shall take precedence.
- 1.5 The conditions of this Approval are severable. If any condition of this Approval, or the application of any condition of this Approval to any circumstance, is held invalid or unenforceable, the application of such condition to other circumstances and the remainder of this Approval shall not be affected thereby.

Adverse Effect

- 1.6 The Owner and Operator shall take steps to minimize and ameliorate any adverse effect on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.
- 1.7 Despite the Owner/Operator or any other person fulfilling any obligations imposed by this Approval the person remains responsible for any contravention of any other condition of this Approval or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the adverse effect to the natural environment or impairment of water quality.

Notifications

- 1.8 The Owner shall notify the Director, in writing, and forward a copy of the notification to the District

Manager, within 30 days of the occurrence of any changes in the following information:

- (a) change of the Ownership and/or Operator of the Site;
- (b) change of the address of the Owner or Operator;
- (c) the partners, where the Owner or Operator is or at any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R. S. O. 1990, c. B.17, shall be included in the notification;
- (d) any change of name of the corporation where the Owner or Operator is or at any time becomes a corporation, and a copy of the most current "Initial Notice or Notice of Change" (Form 1 or 2 of Ontario Regulation 182, Chapter C-39, R.R.O. 1990 as amended from time to time), filed under the Corporations Information Act shall be included in the notification to the Director.

- 1.9
- (a) The Owner/Operator shall, forthwith upon request of the Director, District Manager, or Provincial Officer, furnish any information requested by such persons with respect to compliance with this Approval, including but not limited to, any records required to be kept under this Approval; and
 - (b) In the event the Owner/Operator provides the Ministry with information, records, documentation or notification in accordance with this Approval (for the purposes of this condition referred to as "Information"),
 - i. the receipt of Information by the Ministry;
 - ii. the acceptance by the Ministry of the Information's completeness or accuracy; or
 - iii. the failure of the Ministry to prosecute the Owner, or to require the Owner to take any action, under this Approval or any statute or regulation in relation to the Information;

shall not be construed as an approval, excuse or justification by the Ministry of any act or omission of the Owner/Operator relating to the Information, amounting to noncompliance with this Approval or any statute or regulation.

- 1.10
- The Owner/Operator shall allow Ministry personnel, or Ministry authorized representative(s), upon presentation of credentials, to carry out any and all inspections authorized by the Environmental Protection Act, R.S.O. 1990, and the Ontario Water Resources Act, R. S. O. 1990 or the Pesticides Act, R. S. O. 1990, as amended, of any place to which this Approval relates and without restricting the generality of the foregoing to:

- (a) enter upon the premises or the location where the records required by the conditions of this Approval are kept;

- (b) have access to and copy, at any reasonable time, any records required by the conditions of this Approval;
- (c) inspect at reasonable times any facilities (including monitoring and control equipment), equipment, practices or operations required by the conditions of this Approval; and
- (d) sample and monitor at reasonable times for the purposes of assessing compliance with the conditions of this Approval.

1.11 All records and monitoring data required by the conditions of this Approval shall be kept on the Owner's premises for a minimum period of two (2) years from the date of their creation.

1.12 The Owner/Operator shall ensure that all communication made pursuant to this Approval refers to the Approval No. A070808.

1.13 Any information relating to this Approval and contained in Ministry files shall be made available to the public in accordance with the provisions of the Freedom of Information and Protection of Privacy Act, R.S.O. 1990, C. F-31.

2.0 SITE DESIGN, DEVELOPMENT AND OPERATION

2.1 (a) The Site shall be designed, operated and maintained at all times, in accordance with the EPA, Regulation 347, the conditions of this Approval, report entitled Oxford County Salford Landfill Site Design and Operations Report, prepared by M.M. Dillon Limited, dated September 12, 1984, and revised on June 17, 1986 and report entitled County of Oxford, Oxford Landfill Site, Amendment to 1986 Design and Operation Report, prepared by R.J. Burnside & Associates Limited, dated April 2013, included in Schedule "A" as Items 6 and 7.

(b) The combined capacity of North Fill Area and South Fill Area, including waste, daily, and final cover, shall not exceed 5,900,000 cubic metres, as represented by final contours in Figure 5, Item 7 of Schedule "A".

(c) Two years prior to North Fill Area reaching final capacity and before South Fill Area is to be utilized, the Owner shall submit to the Director, a complete design and operation plan for utilization of the approved capacity in the South Fill Area.

DAILY, INTERMEDIATE AND FINAL COVER

2.2 Waste shall be deposited in the fill area in an orderly manner. All waste shall be compacted and then covered in accordance with the following schedule:

- (a) (i) Soil cover material with a minimum thickness of 150 mm or an equivalent thickness of alternative cover material as approved by the Director shall be placed over the

entire working face at the end of each operating day;

(ii) The Owner shall ensure that a minimum cover material supply equal to two days requirements is maintained at the Site to ensure that adequate cover is always available.

(b) Interim cover consisting of a minimum thickness of 300 mm of soil cover or an equivalent thickness of alternative cover material as approved by the Director shall be placed on areas where landfilling has been temporarily discontinued for six months or more.

(c) In areas where landfilling has reached final contours, final cover shall be applied within two years in accordance to details outlined in Item 6 of Schedule "A".

(d) The landfilling area shall be inspected monthly for erosion of the interim and final cover material. Appropriate corrective measures shall be undertaken by the Owner within 5 working days, weather permitting, after an erosion problem is identified.

2.3 The Owner shall ensure that there is no burning of waste at the Site.

2.4 The Owner shall ensure that there is no uncontrolled scavenging of waste at the Site.

WASTE DIVERSION FACILITIES

2.5 (a) Diversion Facilities shall be operated and maintained as outlined in Section 2.1, Item 7 of Schedule "A".

(b) The Owner shall ensure that the Site and the Diversion facilities are operated and maintained such that the vermin, vectors, dust, litter, odour, noise and traffic do not create a nuisance.

(c) The Owner shall ensure that all white goods containing refrigerants are stored in a segregated area in an upright position and in a manner that allows for safe handling and removal of refrigerants as required by O. Reg. 189, until refrigerant has been drained and item has been tagged by a licensed contractor.

SITE INSPECTIONS AND RECORD KEEPING

2.6 (a) An inspection of the working area of the Site and all active equipment shall be conducted each day the Site is in operation to ensure that the Site is being operated in compliance with this Approval. Any deficiencies discovered as a result of the inspection shall be remedied immediately, including temporarily ceasing operations at the Site if needed.

(b) A record of the inspections shall be kept in a daily log book or a dedicated electronic file that includes:

a. the name and signature of person that conducted the inspection;

- b. the date and time of the inspection;
- c. the list of any deficiencies discovered;
- d. the recommendations for remedial action; and
- e. the date, time and description of actions taken.

SITE SECURITY AND ACCESS

- 2.7 (a) The Owner shall construct adequate fence and gate to secure Site from unauthorized access. During non-operating hours, the Site entrance and exit gates shall be locked and the Site shall be secured against access by unauthorized persons
- (b) Access roads and on-Site roads shall be provided and maintained in a manner that vehicles hauling waste to and on the Site may travel readily and safely on any operating day. During winter months, when the Site is in operation, roads must be maintained to ensure safe access to the landfill working face. Access roads must be clear of mud, ice and debris which may create hazardous conditions.

COMPLAINT PROCEDURE

- 2.8 If at any time, the Owner receives complaints regarding the Site, the Owner shall respond to these complaints according to the following procedure:
- (a) The Owner shall record and number each complaint, either electronically or in a log book, and shall include the following information: the nature of the complaint, the name, address and the telephone number of the complainant (if the complainant will provide this information) and the time and date of the complaint;
- (b) The Owner shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint if applicable and forward a formal reply to the complainant; and
- (c) The Owner shall complete and retain on-site a report written within two (2) weeks of the complaint date, listing the actions taken to resolve the complaint if applicable and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

GROUNDWATER AND SURFACE WATER MONITORING

- 2.9 (a) The Owner shall ensure that all groundwater monitoring wells which form part of the monitoring program are properly capped, locked and protected from damage.
- (b) Monitoring wells shall be inspected during groundwater monitoring events and any changes in the physical condition of each well shall be documented. Necessary repairs shall be undertaken, as needed. If a monitoring well is greatly damaged and cannot reasonably be repaired, the District Manager shall be notified and the well shall be properly abandoned.

The well shall be replaced by a new monitoring well if directed by the District Manager to do so in accordance with O. Reg. 903.

- (c) All monitoring wells which are no longer required as part of the groundwater monitoring program, and have been approved by the District Manager for abandonment, shall be decommissioned by the Owner, as required, in accordance with O.Reg. 903. A report on the decommissioning of the well shall be included in the Annual Report for the period during which the well was decommissioned.

2.10 The Owner shall conduct groundwater and surface water monitoring at the Site in accordance with the details outlined in Section 3.2, Item 7 of Schedule "A" and as listed in the following table:

Groundwater Monitoring Locations	Frequency	Parameters
00-03, 022R, 023R, 101R, 111, 141R, 191, 231R, 232R, 233R, 263R, 381R, 531R, 541(new well to be drilled in Lower Till), 551R, 552R, 561, 562, 571, 581, 591(new well to be drilled west of 591 with screens in Fractured Till, Upper Till, and Inter-Till Sand), 998, 999 (bedrock well), 03-08 (existing leachate well), and proposed South Fill Area leachate well when it is developed	Twice per year	pH, Conductivity, Hardness, Chloride, DOC, Alkalinity, Carbonate, Bicarbonate, Nitrate, Nitrite, Sulphate, Calcium, Potassium, Magnesium, Sodium, Phenols, Fluoride, colour and turbidity
Private Wells: 902, 904, 906, 907, 908, 909, 911, 912, 913, 916, 917, 918, 920, 921, 922	Once per year	pH, Conductivity, Hardness, Chloride, DOC, Phenols, Fluoride, colour and turbidity
Leachate Sampling: all accessible collection system manholes	Once per year	pH, Conductivity, Hardness, Chloride, DOC, Phenols, Fluoride, colour and turbidity

Surface Water Monitoring Locations	Frequency	Parameters
SW1 (971), Sediment Basin A SW4(974), Wet area at Manicom boundary, 11/12 lot line SW7(977), Sediment Basin B SW8(978), Hooper Drain catchbasin upstream of site SW9(979), Hooper Drain manhole downstream from site	Four times per year	pH, Conductivity, Hardness, Chloride, DOC, Phenols, Fluoride, colour and turbidity
To be added when South Fill Area is developed: SW2(972), Pond at Bartram boundary, 10/11 lot line SW5(975), Culvert at Hwy 19 on Anscombe Drain	Four times per year	pH, Conductivity, Hardness, Chloride, DOC, Phenols, Fluoride, colour and turbidity

2.11 The Owner shall follow trigger mechanisms outlined in Section 3.3.1 Item 7 of Schedule "A".

CHANGES TO THE MONITORING PLAN

- 2.12 (a) The Owner may request changes to the monitoring program(s) to the District Manager in writing.
- (b) Within fourteen (14) days of receiving the written correspondence from the District Manager confirming that the District Manager is in agreement with the proposed changes to the environmental monitoring program, the Owner shall forward a letter identifying the proposed changes and a copy of the correspondences from the District Manager and all other correspondences and responses related to the changes to the monitoring program, to the Director requesting the Approval be amended to approve the proposed changes to the environmental monitoring plan prior to implementation.

3.0 LANDFILL GAS COLLECTION AND FLARING SYSTEM

3.1 A landfill gas collection system, comprising vertical gas extraction wells, a network of sub-laterals, laterals and perimeter header piping, and a flaring facility, shall be constructed and operated, in accordance with the conceptual design and operation described in Section 2.1 in the Design Report,

Item 1 in Schedule "A", as amended by Item 3 in Schedule "A", attached to this Approval.

- 3.2 The landfill gas collection and flaring system, phase 1, shall be constructed and operated in accordance with the detailed design and development, as described in Section 2.2 in Item 1 in Schedule "A", as amended by Item 3 in Schedule "A", attached to this Approval.
- 3.3 Detailed design in phase 2 and all subsequent phases of the landfill gas collection and flaring system, shall be submitted by the Owner/Operator, for the approval of the Director, with copies to the District Manager, prior to construction. The detailed design, development drawings and specifications, shall reflect the conceptual design of the landfill gas collection and flaring system, as presented in Item 1 in Schedule "A", as amended by Item 3 in Schedule "A", attached to this Approval. Any design optimization or modification shall be clearly identified, along with an explanation of the reasons for the change.
- 3.4 The detailed Phase 2 design shall, at a minimum include the following:
 - (a) full-scale design drawings and specifications, including profiles, site plan showing all engineered facilities associated with the headers, laterals and sub-laterals, and material descriptions and requirements for delivery, storage, installation and sampling;
 - (b) detailed quality assurance/quality control (QA/QC) program for construction of the landfill gas collection and flaring system ;
 - (c) details of nuisance control programs and necessary precautions to avoid disturbance to the natural environment caused by the operation of the landfill gas collection and flaring system;
 - (d) details on the monitoring, maintenance, repair and replacement of components of the landfill gas collection and flaring system, as necessary; and
 - (e) contingency plans for environmental controls.
- 3.5 The Owner shall operate and maintain the landfill gas collection and flaring system in accordance with Operation and Maintenance Manual, Landfill Gas Collection and Flaring System, Oxford County Landfill Site, prepared by Comcor Environmental Limited, dated January 17, 2011, Items No. 5 of Schedule "A".
- 3.6 During construction of the landfill gas collection system, the Owner/Operator shall implement as a minimum, odour control plan described in Item 3 in Schedule "A", attached to this Approval. The effectiveness of the odour control plan shall be monitored and evaluated regularly, and updated or amended as necessary, based on operational experience and odour complaints received.
- 3.7 After commissioning the landfill gas collection and flaring system, the Owner/Operator shall prepare and submit to the District Manager, with copies maintained at the Site, a written report covering any significant landfill gas collection system expansion or modification. The report shall detail the construction activities, QA/QC program carried out for the construction, as-built drawings

of the landfill gas collection and flaring system to date, including a description and reasons for any changes to the design of the landfill gas collection and flaring system.

- 3.8 Phase 2 of the landfill gas collection system shall be constructed and operated in accordance with the detailed design listed as Item 8 in Schedule "A".

4.0 LANDFILL GAS COLLECTION AND FLARING SYSTEM OPERATION

- 4.1 Prior to implementation of any changes in the landfill gas collection and flaring system operation, that may result in activities not specified in the Design Report, Item 1, in Schedule "A", as amended in Item 3 in Schedule "A", attached to this Approval, or in this Approval, and that may likely cause the discharge of contaminant to the natural environment, the Owner/Operator shall obtain approval from the Director.
- 4.2 The Owner/Operator shall maintain records of landfill gas flow. Such records shall be made available for inspection upon request by a Provincial Officer.
- 4.3 In the event of a discharge of a contaminant, including landfill gas, landfill gas condensate, etc., the Owner/Operator shall immediately notify the District Manager and the Ministry's "Spills Action Centre", and advise of actions being taken to contain, control and ameliorate the situation.
- 4.4 For any situation when landfill gas is not being collected and incinerated and which cannot be rectified within 48 hours, the Owner/Operator shall notify the District Manager and advise of actions being taken to contain, control and ameliorate the situation.
- 4.5 Any gas extraction well that needs to be replaced due to damage or the well is deemed to be not functioning properly, the Owner/Operator shall replace the gas extraction well within a reasonable time frame of identifying the need for replacement. Any such changes to the gas extraction system shall be documented in the Annual Report.
- 4.6 The Owner/Operator shall carry out odour and landfill gas management, as well as the rehabilitation of the Site, in accordance with a report entitled "Landfill Gas and Odour Management Plan", Item 4 in Schedule "A", attached to this Environmental Compliance Approval.
- 4.7 The Owner/Operator shall document and include in the subsequent Annual Report, the results of the emissions survey completed. The reporting on the emissions survey shall, as a minimum, include tabulated results, drawing showing survey grid nodes, and a site map showing colour-coded concentration levels of landfill gas emissions based on the results of the surface emissions survey.

5.0 LANDFILL GAS ENVIRONMENTAL CONTROL, MONITORING/INSPECTION AND MAINTENANCE

- 5.1 The Owner/Operator shall carry out monitoring program for landfill gas to monitor the performance of the landfill gas collection and flaring system, as described in Item 1 in Schedule "A", as amended in Item 3 in Schedule "A", attached to this Approval, and as per written recommendations of the

District Manager, through the review of Annual Monitoring Reports, and any related EPA requirements.

- 5.2 Components of the active gas collection system shall be monitored on an as-needed basis, with a routine frequency of once per month for the full collection field. Any observed deficiencies/problems shall be repaired as soon as practicable and a summary of remedial actions carried out, shall be reported in the Annual Monitoring Report.

Subsurface Migration of Combustible Gas

- 5.4 Buildings and structures existing or to be built on Site shall be situated, constructed and monitored in a manner which minimizes the potential for explosive hazards due to combustible gas. Appropriate methane detection and alarm equipment, shall be installed and maintained for all enclosed unvented buildings and/or structures on Site, which at times are occupied by people.

Note: For the purposes of Condition 5.4, vented building or structure is a building or structure built with its floor sealed and elevated above ground and having adequate air space underneath the floor of the building or structure.

- 5.5 Subsurface migration of combustible methane gas shall meet the following limits, as required by Ontario Reg. 232/98:

- (a) The concentration of methane gas must be less than 2.5 percent by volume at the limits of the property boundary.
- (b) The concentration of methane gas must be less than 1.0 percent by volume in any on-site building or enclosed structure, and in the area immediately outside the foundation or basement floor of the building or structure that is located on Site, if the building or structure is accessible by people or contains electrical equipment or a potential source of ignition.
- (c) Sub-condition (b) does not apply to a leachate collection, storage or pumping station or a landfill gas collection and/or treatment facility for which specific Occupational Health and Safety measures and procedures relating to the risk of asphyxiation and the risk of explosion, must be followed.
- (d) The concentration of methane gas from the Site in any off-Site building or enclosed structure, and in the area immediately outside the foundation or basement floor of the building or structure, if the building or structure is accessible by people or contains electrical equipment or a potential source of ignition, must be less than 0.05% by volume.

- 5.6 If a measured gas concentration at any specific compliance location, reaches the applicable limit identified in Sub-conditions 5.5 (a) and (b) above, or if a notification is given that gas concentration has reached the limit specified in Sub-condition 5.5(d), above, the reading shall be re-measured immediately and daily for a period of up to three (3) consecutive days. If these readings confirm an

exceedance of the applicable limit, the District Manager shall be notified immediately, and appropriate control measures shall be implemented as soon as possible thereafter.

6.0 ANNUAL REPORT

6.1 By April 30th following the end of each operating year, the Owner/Operator shall prepare and submit to the District Manager an annual report, covering the previous calendar year. The report shall include, as a minimum, the following information:

- (a) a survey of the Site's waste disposal area, drawings showing areas of fill, buffer areas, current landfilling area contours, percentage of available space utilized, and an estimate of the remaining disposal capacity;
- (b) a summary of the quantities of waste received;
- (c) a drawing(s) indicating all groundwater, surface water and gas monitoring locations;
- (d) tables outlining monitor locations, analytical parameters sampled and frequency of sampling;
- (e) the results and an interpretive analysis of the results of all monitoring at the Site including groundwater, surface water, leachate and landfill gas monitoring, and an assessment of the need to amend the monitoring program or to develop and implement contingency measures;
- (f) review and assessment of any environmental and operational problems, that could negatively impact the environment, encountered during the operation of the Site and during Site inspections and any mitigative actions taken;
- (g) a summary of any public complaints received by the Owner/Operator and the responses made;
- (h) a statement as to compliance with all Conditions of this Approval and all applicable Ministry Acts, Regulations, Guidelines, including Guideline B-7, Incorporation of the Reasonable Use Concept Into MOEE Groundwater Management Activities, (MECP 1994), and Ontario Provincial Water Quality Objectives;
- (i) any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard; and
- (j) any other information with respect to the Site which the District Manager may require from time to time.

7.0 CLOSURE PLAN

7.1 At least 2 years prior to the anticipated date of closure of this Site or any aspect of the operations at the site, the Owner shall submit to the Director for approval, with copies to the District Manager, a detailed site closure plan pertaining to the termination of landfilling operations and/or any aspect of the operations at this Site, post-closure inspection, maintenance and monitoring, and end use. The plan shall include but not limited to the following:

- (a) a plan showing Site appearance after closure;
- (b) a description of the proposed end use of the Site;
- (c) a description of the procedures for closure of the Site;
- (d) advance notification of the public of the landfill closure;

- (e) posting of a sign at the Site entrance indicating the landfill is closed and identifying any alternative waste disposal arrangements;
- (f) completion, inspection and maintenance of the final cover and landscaping;
- (g) site security;
- (h) removal of unnecessary landfill-related structures, buildings and facilities; and
- (i) final construction of any control, treatment, disposal and monitoring facilities for leachate, groundwater, surface water and landfill gas;
- (j) a schedule indicating the time-period for implementing sub-conditions (a) to (e) above.
- (k) description of the procedures for post-closure care of the Site, including operation, inspection and maintenance of the control, treatment, disposal and monitoring facilities for leachate, groundwater, surface water and landfill gas;
- (l) record keeping and reporting; and
- (m) complaint contact and response procedures;
- (n) an assessment of the adequacy of and need to implement contingency plans for leachate and methane gas; and
- (o) an updated estimate of the contaminating life span of the Site, based on the results of the monitoring programs to date.

7.2 Within ten (10) days after closure of the Site, the Owner shall notify the Director, in writing, that the Site is closed and that the Site Closure Plan has been implemented.

The following documentation hereby forms Schedule "A", and part of Approval No. A070808.

1. Report entitled "Ontario Regulation 347 Design Report, Oxford County Landfill Site, Salford, Ontario", dated June 26, 2009.
2. Application for Provisional Certificate of Approval for a Waste Disposal Site, Installation and Operation of Landfill gas Collection and Flaring System, dated March 29, 2010, signed by Robert Walton, Director of Public Works, County of Oxford.
3. Letter dated April 15, 2010, from Denise Burgess, Comcor Environmental Limited to Dickson Odame-Osafo, Ministry of the Environment, Re: response to MOE comments on the design report.
4. Report entitled "Landfill Gas and Odour Management Plan, Landfill Gas Collection and Flaring System, Oxford County Landfill Site" Salford, Ontario, dated March 15, 2011, prepared by COMCOR Environmental Limited.
5. Report entitled "Operation and Maintenance Manual, Landfill Gas Collection and Flaring System, Oxford County Landfill Site", prepared by Comcor Environmental Limited, dated January 17, 2011.
6. Report entitled "Oxford County Salford Landfill Site Design and Operations Report", prepared by M.M. Dillon Limited, dated September 12, 1984, and revised on June 17, 1986.
7. Report entitled "County of Oxford, Oxford Landfill Site, Amendment to 1986 Design and Operation Report", prepared by R.J. Burnside & Associates Limited, dated April 2013.
8. Report entitled "Landfill Gas Collection System, Phase 2 Landfill Gas Expansion Design Report, Oxford County Waste Management Facility, Salford, Ontario", dated June 7, 2024 prepared by Comcor Environmental Limited.

The reasons for the imposition of these terms and conditions are as follows:

1. The reasons for **Conditions 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.9, 1.11, 1.12, and 1.13** are to clarify the legal rights and responsibilities of the Owner and Operator under this Approval.
2. The reasons for **Conditions 2.1(a), 3.2, 3.3 and 4.2** are to ensure that the Site is designed, operated, monitored and maintained in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.
3. The reason for **Condition 1.8** is to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes.
4. The reason for **Condition 1.10** is to ensure that appropriate Ministry staff has ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Certificate of Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA and OWRA.

5. The reason for **Condition 2.1(b)** is to specify the site approved capacity.
6. The reason for **Condition 2.1(c)** is to ensure submission of a design and operation plan which will meet the future standards of best practices.
7. The reasons for **Conditions 2.1, 3.1, 3.2, 3.3, 3.4, 3.5, and 3.8** are to ensure that the Site is designed, constructed and operated in a manner which conforms to current standards of landfill development and operation and as approved.
8. The reason for **Condition 2.2** is to ensure that the waste is covered regularly and that final cover is applied as the site reaches final contours.
9. The reason for **Condition 2.8** is to ensure that complains are handled properly.
10. The reasons for **Conditions 2.3, 2.4, 2.5, 2.6, and 2.7** are to ensure that the Site is operated, inspected and maintained in an environmentally acceptable manner and does not result in a hazard or nuisance to the natural environment or to any person.
11. The reasons for **Conditions 3.5, 4.1, 4.2, 4.3, and 4.4** are to ensure site is operated in a controlled manner.
12. The reasons for **Condition 3.7, 4.5 and 4.6** are to ensure optimized performance and capture efficiency of the landfill gas collection and control system design, based on operating experience and monitoring results, and to mitigate possible odour impacts from the site.
13. The reason for **Condition 4.7** is to ensure that landfill gas emission data are documented and mapped clearly to identify and remediate areas deficient of landfill gas collection.
14. The reasons for **Conditions 2.9, 2.10, 2.11, 2.12, 5.1 and 5.2** are to demonstrate that the landfill site is performing as designed and the impacts on the natural environment are acceptable. Regular monitoring allows for the analysis of trends over time and ensures that there is early warning of potential problems so that any necessary remedial/contingency action can be taken.
15. The reason for **Condition 5.4** is to ensure protection of public health and safety of people against potential for explosion due to accumulation of landfill gas generated at this Site.
16. The reasons for **Conditions 5.5 and 5.6** are to ensure that landfill gas generated at this Site is managed in an environmentally acceptable manner.
17. The reason for **Condition 6.1** is to ensure that regular review of site operations and monitoring data is documented and any possible improvements to site operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of site operations and monitoring.
18. The reasons for **Conditions 7.1 and 7.2** are to ensure that final closure of the Site is completed in an environmentally acceptable manner in order to ensure the long-term protection of the natural environment.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). A070808 issued on November 7, 2013

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal within 15 days after receipt of this notice, require a hearing by the Tribunal. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance

- approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

Pursuant to subsection 139(3) of the *Environmental Protection Act*, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar*
Ontario Land Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5
OLT.Registrar@ontario.ca

and

The Director appointed for the purposes of Part II.1 of the *Environmental Protection Act*
Ministry of the Environment, Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

* **Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.oltt.gov.on.ca**

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

DATED AT TORONTO this 16th day of May, 2025



Mohsen Keyvani, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

RL/

c: District Manager, MECP London - District
Luxon Burgess CET, LET, Comcor Environmental Ltd.

APPENDIX B

Maintenance and Monitoring Schedules



Oxford Landfill
Operation and
Maintenance
Requirements

WEEKLY

Date Completed:	GEM Serial Number _____
Completed by (print):	Anemometer Serial Number _____
Signature:	General Weather _____
	Barometric Pressure _____

Piece of equipment	Maintenance item	Details	frequency (hours)	Scheduled event	Approx. time requirement (min)	Comments	Completed (initial)
Air compressor	Check oil level	Ensure oil level is within proper range	50	1weekly	5		
Air compressor	Check DD, PD prefilter	Ensure filters are draining, ensure indicator is in green range	50	1weekly	5		
Air compressor	Inspection	Inspect for pressure, noise, temperature, vibration, etc		1weekly	5		
Air compressor	Record pressure, run hours			1weekly	5	Pressure: _____ Run Hours: _____	
Blower skid	Check vibration	Compare vibration to typical		1weekly	5		
Blower skid	Check bearing temperatures	Compare temperatures to typical		1weekly	5	Drive End: _____ Non-drive end: _____	
Blower skid	Drain blower	Open blower drain valves and remove moisture		1weekly	5	Moisture Present?	
Blower skid	Record operational parameters	Record: vacuum, pressure, flow, CH4, O2, temp, blower number and separator differential pressure		1weekly	5	Gauge: Inlet outlet: VLS Diff: CH4: CO2: O2: Blower#: Flow: Temp:	
Control room	Record operational parameters	Record vacuum, pressure, blower number, CH4, O2, flow, and run hours		1weekly	5	Screen On Arrival: Inlet outlet: Blower#: CH4: O2: Flow: Run Hours:	
Gas analyzer	Check operation	Check pressure gauges, flow meters, heat trace, drier temp, condensate drain, exhaust		1weekly	5		
Wellfield	Drain temporary piping	Drain liquid and inspect piping for leaks		1weekly	240		



Oxford Landfill
Operation and
Maintenance
Requirements

MONTHLY

Date Completed:	GEM Serial Number _____
Completed by (print):	Anemometer Serial Number _____
Signature:	General Weather _____
	Barometric Pressure _____

Piece of equipment	Maintenance item	Details	frequency (hours)	Scheduled event	Approx. time requirement (min)	Comments	Completed (initial)
Air compressor	Check oil level	Ensure oil level is within proper range	50	1weekly	5		
Air compressor	Check DD, PD prefilter	Ensure filters are draining, ensure indicator is in green range	50	1weekly	5		
Air compressor	Inspection	Inspect for pressure, noise, temperature, vibration, etc		1weekly	5		
Air compressor	Record pressure, run hours			1weekly	5	Pressure: _____ Run Hours: _____	
Air compressor	Clean air filter	Remove and inspect filter, replace when needed	500	2monthly	15		
Air compressor	Check condensate drain	Manually open condensate drain valve to ensure drainage	500	2monthly	5	Moisture Present?	
Air compressor	Check belt tension	Inspect belt tension and wear, replace as needed	500	2monthly	30		
Blower skid	Check vibration	Compare vibration to typical		1weekly	5		
Blower skid	Check bearing temperatures	Compare temperatures to typical		1weekly	5	Drive End: _____ Non-drive end: _____	
Blower skid	Drain blower	Open blower drain valves and remove moisture		1weekly	5	Moisture Present?	
Blower skid	Record operational parameters	Record: vacuum, pressure, flow, CH4, O2, temp, blower number and separator differential pressure		1weekly	5	Gauge: Inlet outlet: VLS Diff: CH4: CO2: O2: Blower#: Flow: Temp:	
Blower skid	Inspection	Inspect for wear: vibration pads, rubber couplings, orange blower/motor coupling,		2monthly	15		
Blower skid	Operate valves	Operate all valves to stops		2monthly	15		
Blower skid	Check vapour liquid separator (VLS)	Check differential pressure, heat trace, drainage		2monthly	5		
Control room	Record operational parameters	Record vacuum, pressure, blower number, CH4, O2, flow, and run hours		1weekly	5	Screen On Arrival: Inlet outlet: Blower#: CH4: O2: Flow: Run Hours:	
Control room	Record operational parameters	Record vacuum, CH4, O2, and flow before and after round		2monthly	5	Screen After Round: Inlet outlet: Blower#: CH4: O2: Flow: Run Hours:	
Flare	Inspect flare	Visual inspection from outside the flare while shutdown including, burner tips, insulation, paint, concrete, ladder safety rail		2monthly	5		
Gas analyzer	Check operation	Check pressure gauges, flow meters, heat trace, drier temp, condensate drain, exhaust		1weekly	5		
Wellfield	Drain temporary piping	Drain liquid and inspect piping for leaks		1weekly	240		
Wellfield	Inspect pump drain traps	Check for operation, leaks, record counter, psi		2monthly	60	PSI Chamber: Counter Chamber: PDT1: PDT2: PDT1: PDT2: PDT3: PDT4: PDT3: PDT4:	
Wellfield	Operate valves	Operate all valves to stops		2monthly	60		
Wellfield	Wellfield monitoring	Gas levels, pressure and flow, valve adjustments		2monthly	240		



Oxford Landfill
Operation and
Maintenance
Requirements
QUARTERLY

Date Completed:	GEM Serial Number _____
Completed by (print):	Anemometer Serial Number _____
Signature:	General Weather _____
	Barometric Pressure _____

Piece of equipment	Maintenance item	Details	frequency (hours)	Scheduled event	Approx. time requirement (min)	Comments	Completed (initial)
Air compressor	Check oil level	Ensure oil level is within proper range	50	1weekly	5		
Air compressor	Check DD, PD prefilter	Ensure filters are draining, ensure indicator is in green range	50	1weekly	5		
Air compressor	Inspection	Inspect for pressure, noise, temperature, vibration, etc		1weekly	5		
Air compressor	Record pressure, run hours			1weekly	5	Pressure: _____ Run Hours: _____	
Air compressor	Clean air filter	Remove and inspect filter, replace when needed	500	2monthly	15		
Air compressor	Check condensate drain	Manually open condensate drain valve to ensure drainage	500	2monthly	5	Moisture Present?	
Air compressor	Check belt tension	Inspect belt tension and wear, replace as needed	500	2monthly	30		
Air compressor	Change air filter	Replace as needed	2000	3quarterly	5		
Air compressor	Change oil	Depressurize compressor, allow to cool, drain oil, fill to specified level	2000	3quarterly	30		
Air compressor	Change oil filter	Change filter when changing oil	2000	3quarterly	15		
Blower skid	Check vibration	Compare vibration to typical		1weekly	5		
Blower skid	Check bearing temperatures	Compare temperatures to typical		1weekly	5	Drive End: _____ Non-drive end: _____	
Blower skid	Drain blower	Open blower drain valves and remove moisture		1weekly	5	Moisture Present?	
Blower skid	Record operational parameters	Record: vacuum, pressure, flow, CH4, O2, temp, blower number and separator differential pressure		1weekly	5	Gauge: Inlet outlet: VLS Diff: CH4: CO2: O2: Blower#: Flow: Temp:	
Blower skid	Inspection	Inspect for wear: vibration pads, rubber couplings, orange blower/motor coupling,		2monthly	15		
Blower skid	Operate valves	Operate all valves to stops		2monthly	15		
Blower skid	Check vapour liquid separator (VLS)	Check differential pressure, heat trace, drainage		2monthly	5		
Blower skid	Change blower grease	Remove old grease and replace	1500	3quarterly	60		
Control room	Record operational parameters	Record vacuum, pressure, blower number, CH4, O2, flow, and run hours		1weekly	5	Screen On Arrival: Inlet outlet: Blower#: CH4: O2: Flow: Run Hours:	
Control room	Record operational parameters	Record vacuum, CH4, O2, and flow before and after round		2monthly	5	Screen After Round: Inlet outlet: Blower#: CH4: O2: Flow: Run Hours:	
Control room	Check operation of ambient gas monitor	Bump test with cal gas		3quarterly	10		
Flare	Inspect flare	Visual inspection from outside the flare while shutdown including, burner tips, insulation, paint, concrete, ladder safety rail		2monthly	5		
Flare	Inspect thermal valve and flame arrestor	Ensure thermal valve is fully Open and remove inspect and clean flame arrestor banks		3quarterly	60		

Piece of equipment	Maintenance item	Details	frequency (hours)	Scheduled event	Approx. time requirement (min)	Comments	Completed (initial)
Gas analyzer	Check operation	Check pressure gauges, flow meters, heat trace, drier temp, condensate drain, exhaust		1weekly	5		
Gas analyzer	Replace filter media	Change bowl filters and H2S scrubber media as required		3quarterly	120		
Wellfield	Drain temporary piping	Drain liquid and inspect piping for leaks		1weekly	240		
Wellfield	Inspect pump drain traps	Check for operation, leaks, record counter, psi		2monthly	60	PSI Chamber: Counter Chamber: PDT1: PDT2: PDT1: PDT2: PDT3: PDT4: PDT3: PDT4:	
Wellfield	Operate valves	Operate all valves to stops		2monthly	60		
Wellfield	Wellfield monitoring	Gas levels, pressure and flow, valve adjustments		2monthly	240		



Oxford Landfill
Operation and
Maintenance
Requirements
YEARLY

Date Completed:	GEM Serial Number _____
Completed by (print):	Anemometer Serial Number _____
Signature:	General Weather _____
	Barometric Pressure _____

Piece of equipment	Maintenance item	Details	frequency (hours)	Scheduled event	Approx. time requirement (min)	Comments	Completed (initial)
Air compressor	Check oil level	Ensure oil level is within proper range	50	1weekly	5		
Air compressor	Check DD, PD prefilter	Ensure filters are draining, ensure indicator is in green range	50	1weekly	5		
Air compressor	Inspection	Inspect for pressure, noise, temperature, vibration, etc		1weekly	5		
Air compressor	Record pressure, run hours			1weekly	5	Pressure: _____ Run Hours: _____	
Air compressor	Clean air filter	Remove and inspect filter, replace when needed	500	2monthly	15		
Air compressor	Check condensate drain	Manually open condensate drain valve to ensure drainage	500	2monthly	5	Moisture Present?	
Air compressor	Check belt tension	Inspect belt tension and wear, replace as needed	500	2monthly	30		
Air compressor	Change air filter	Replace as needed	2000	3quarterly	5		
Air compressor	Change oil	Depressurize compressor, allow to cool, drain oil, fill to specified level	2000	3quarterly	30		
Air compressor	Change oil filter	Change filter when changing oil	2000	3quarterly	15		
Air compressor	Clean oil cooler	Use compressed air and/or brush to clean cooler fins	4000	4yearly	30		
Air compressor	Change oil separator	Change air/oil separator during oil change	4000	4yearly	15		
Air compressor	Change DD prefilter	Depressurize system, remove bowl, replace filter	4000	4yearly	15		
Air compressor	Change PD prefilter	Depressurize system, remove bowl, replace filter	4000	4yearly	15		
Air compressor	Service air dryer	Bypass drier, depressurize drier, unplug unit.	12000	4yearly	120		
Blower skid	Check vibration	Compare vibration to typical		1weekly	5		
Blower skid	Check bearing temperatures	Compare temperatures to typical		1weekly	5	Drive End: _____ Non-drive end: _____	
Blower skid	Drain blower	Open blower drain valves and remove moisture		1weekly	5	Moisture Present?	
Blower skid	Record operational parameters	Record: vacuum, pressure, flow, CH4, O2, temp, blower number and separator differential pressure		1weekly	5	Gauge: Inlet outlet: VLS Diff: CH4: O2: CO2: O2: Blower#: Flow: Temp:	
Blower skid	Inspection	Inspect for wear: vibration pads, rubber couplings, orange blower/motor coupling.		2monthly	15		
Blower skid	Operate valves	Operate all valves to stops		2monthly	15		
Blower skid	Check vapour liquid separator (VLS)	Check differential pressure, heat trace, drainage		2monthly	5		
Blower skid	Change blower grease	Remove old grease and replace	1500	3quarterly	60		
blower skid	Inspect moisture separator filter	Disconnect and remove filter, clean/replace as required		4yearly	240		
Control room	Record operational parameters	Record vacuum, pressure, blower number, CH4, O2, flow, and run hours		1weekly	5	Screen On Arrival: Inlet outlet: Blower#: CH4: O2: CO2: O2: Flow: Run Hours:	
Control room	Record operational parameters	Record vacuum, CH4, O2, and flow before and after round		2monthly	5	Screen After Round: Inlet outlet: Blower#: CH4: O2: CO2: O2: Flow: Run Hours:	

Piece of equipment	Maintenance item	Details	frequency (hours)	Scheduled event	Approx. time requirement (min)	Comments	Completed (initial)
Control room	Check operation of ambient gas monitor	Bump test with cal gas		3quarterly	10		
control room	Calibrate ambient gas monitor	Refer to manual		4yearly	60		
Flare	Inspect flare	Visual inspection from outside the flare while shutdown including, burner tips, insulation, paint, concrete, ladder safety rail		2monthly	5		
Flare	Inspect thermal valve and flame arrestor	Ensure thermal valve is fully Open and remove inspect and clean flame arrestor banks		3quarterly	60		
Gas analyzer	Check operation	Check pressure gauges, flow meters, heat trace, drier temp, condensate drain, exhaust		1weekly	5		
Gas analyzer	Replace filter media	Change bowl filters and H2S scrubber media as required		3quarterly	120		
Gas analyzer	Calibrate analyzer	Refer to manual		4yearly	120		
Wellfield	Drain temporary piping	Drain liquid and inspect piping for leaks		1weekly	240		
Wellfield	Inspect pump drain traps	Check for operation, leaks, record counter, psi		2monthly	60	PSI Chamber: PDT1: PDT2: PDT3: PDT4: Counter Chamber: PDT1: PDT2: PDT3: PDT4:	
Wellfield	Operate valves	Operate all valves to stops		2monthly	60		
Wellfield	Wellfield monitoring	Gas levels, pressure and flow, valve adjustments		2monthly	240		
Wellfield	Clean drain trap pumps	Disassemble and clean pumps		4yearly	480		

APPENDIX C

Notification of Intermittent Flaring



December 17, 2015

320 Pinebush Road, Suite 12
Cambridge, ON N1T 1Z6
tel (519) 621-6669
fax (519) 621-9944
www.comcor.com

By: Email

Ministry of the Environment
Bob Slivar – Environmental Office
London Regional Office
2nd Floor.
733 Exeter Road
London ON N6E 1L3

9-440-11

Dear Mr. Slivar:

RE: **LANDFILL GAS CONTROL SYSTEM – INTERMITTENT OPERATIONS**
Oxford County Waste Management Facility, Salford, ON

The Landfill Gas Collection and Flaring System at the Oxford County Waste Management Site has been operating under Environmental Compliance Approval (ECA) No. A070808 since December 2010. The system is comprised of eighteen vertical gas extraction wells that are connected to a permanent main header and lateral system, including and some temporary Big “O” piping placed above ground. The average system flow at the plant in 2015 was near the minimum system threshold.

In order to maintain proper combustion temperatures in the flare, it is proposed that operations be cycled on an on/off schedule. This will allow gas reserves to build up to levels that will support combustion at the required temperatures over the operating periods. The purpose of the landfill gas collection and flaring system is primarily reduce greenhouse gases and control odours from the site. The County is not aware of any odour complaints or occurrences near the site. Therefore, the County believes that an intermittent operating schedule will not have any effect on odours from the site.

If you have any questions, please call the undersigned.

Yours truly,
Comcor Environmental Limited

Shannan McGarr, B.Sc.
Operations and Maintenance Manager

cc: Pamela Antonio – Waste Management Coordinator