

Round 2 TRC Comments

SR Number: 096012 Proponent: Fundy Regional Service Commission

SR Title: Crane Mountain Landfill Augmentation and Life Extension Project - Increasing Approved Height

Project Review ID: RRID-159 Review Iteration: 2

Response Period Close:

Comment 1 Proponent Response ID: PRID-2397

Review Comment:

Given the increase in waste tonnage managed, has the Fundy Regional Service Commission (FRSC) considered an on-site anaerobic digestion unit at Crane Mountain Landfill?

As mentioned in the Government of New Brunswick (GNB) document 'Our Pathway Towards Decarbonization and Climate Resilience - New Brunswick's Climate Change Action Plan 2022 to 2027' ([climate-change-action-plan.pdf \(gnb.ca\)](#)): the province supports the development of anaerobic digester projects as a means to reduce waste-related GHG emissions, divert organics, convert waste into a valuable resource, and promote a circular economy.

Reducing waste-related GHG emissions, diverting organics, converting waste into valuable resources, and promoting a circular economy are also objectives of New Brunswick's Strategic Action Plan for Solid Waste Management 2023 to 2030 – 'A Roadmap for Transforming our Waste into Materials for Tomorrow' ([solid-waste-management-report-e.pdf \(gnb.ca\)](#)).

Proponent Response:

Comment 2 Proponent Response ID: PRID-2402

Review Comment:

Pertaining to Comment 2, PRID-2154, of Round 1

The response indicates that, 'relocation of the leachate surge pond is considered outside the scope of this EIA' and that 'determination of this EIA will influence leachate management plans for the landfill and there are currently no detailed plans or designs for the relocation of the leachate surge pond'.

However, leachate management is part of this EIA and required in order to assess if the augmentation plan is acceptable.

DELG does acknowledge that when designed and constructed in 2004 that the leachate surge lagoon was intended to be converted to a MSW containment cell (Cell 17) once the remaining containment area was filled.

During the designed and construction, were there any preliminary relocation plans for the leachate surge lagoon - that would have been reviewed and approved by DELG?

Would the proponent have any records they could provide indicating that a prior review of the leachate surge lagoon has occurred and therefore an updated preliminary plan is not required as part of this EIA?

If not, please describe the process for converting the leachate surge lagoon into a MSW containment cell. Please include how leachate will be handled when the current leachate surge lagoon is being converted to Cell 17.

Proponent Response:

Comment 3 Proponent Response ID: PRID-2399

Review Comment:

Pertaining to Comment 4, PRID-2161, of Round 1

The response indicates, 'pending successful project determination, FRSC will revise the GHG management plan in consideration of this Project. Improvements to and expansion of the LFG collection and utilization infrastructure are expected to reduce GHG emissions from the landfill'.

DELG looks forward to receiving a revised GHG Management Plan pending successful project determination and after the project is fully implemented and operational.

Please note that this revised GHG Management Plan should be submitted for review and approval through DELG's Authorizations Branch and the Approval to Operate process.

Proponent Response:

Comment 4 Proponent Response ID: PRID-2396

Review Comment:

In addition to achieving New Brunswick's 2030 greenhouse gas (GHG) emissions target, the province has recently committed to achieving net-zero emissions by 2050.

Going forward, all activities within New Brunswick will need to align with these objectives.

To assist the Crane Mountain Landfill meet these emission targets, please use the best available technologies and practices to reduce or eliminate GHGs from this Project.

Proponent Response:

Comment 5 Proponent Response ID: PRID-2401

Review Comment:

Pertaining to Comment 15, PRID-2110, of Round 1

The response indicated, 'A report on the engagement activities undertaken by FRSC will be submitted to DELG as part of the EIA process'.

When available, as per Section 7.1 of the EIA Registration document - please submit a report documenting the Indigenous Peoples engagement activities that were undertaken, as well as the results of those activities (i.e. comments received and the responses to any such comments) to DELG for review and approval before a Certificate of Determination can be issued for this project.

Proponent Response:

Comment 6 Proponent Response ID: PRID-2400

Review Comment:

Pertaining to Comment 16, PRID-2109, of Round 1

The response indicated, 'A report on the public involvement activities undertaken by FRSC will be submitted to DELG as part of the EIA process'.

When available, as per Section 7.2 of the EIA Registration document - please submit a report documenting the Public Involvement activities that were undertaken, as well as the results of those activities (i.e. comments received from the public and the responses to any such comments) to DELG for review and approval before a Certificate of Determination can be issued for this project.

Proponent Response: