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February 12, 2026

Town of Grand Valley
5 Main St N.
Grand Valley, ON L9W 5S6
Phone: (519) 928-5652

Attention: Matthew Bos - Director of Public Works

Re: East Luther Landfill Optimization of Monitoring and Reporting Requirements - Part Lot 21, Concession 4, County of Dufferin, East Luther Landfill Site Closure Plan (Closure Plan)

I have reviewed the Proposed Optimization of Monitoring and Reporting Requirements, East Luther Landfill, Township of East Luther Grand Valley, County of Dufferin, Ontario, prepared by R. J. Burnside & Associates Limited (Burnside), and dated March 24, 2023.

To support this request, ministry staff have reviewed the following documentation in relation to the proposed including the following documents:

- East Luther Landfill Optimization of Monitoring and Reporting Requirements Prepared by R.J. Burnside & Associates Limited dated March 24, 2023.
- Township of East Luther Grand Valley -East Luther Landfill Site Closure Plan Prepared by R.J. Burnside & Associates Limited dated October 2005.
- 2024 Annual Monitoring Report East Luther Landfill Township of Grand Valley prepared by R.J. Burnside & Associates Limited dated January 2025.
- 2023 Annual Monitoring Report East Luther Landfill Township of Grand Valley prepared by R.J. Burnside & Associates Limited dated January 2024.
- 2022 Annual Monitoring Report East Luther Landfill Township of Grand Valley prepared by R.J. Burnside & Associates Limited dated March 2023.
- Memo: Technical Review of the Proposed Reduction in Monitoring and Reporting Requirements, East Luther Landfill, Township of East Luther Grand Valley, County of Dufferin, Ontario prepared by Salah Sharif dated January 3, 2024.
- Email: East Luther Closed Landfill - SW monitoring (ECHO # 1-238736742) Prepared by Mohammad Sajjad Khan dated July 23, 2024.
- Response to MECP Review Comments Optimization of Monitoring and Reporting Requirements, East Luther Landfill Project No.: MAE084000.2025 Prepared by R.J. Burnside & Associates Limited dated December 2, 2025.

Burnside has prepared a supporting document outlining a proposed plan to optimize the monitoring and reporting program for the Site. A Long-Term Monitoring Optimization (LTMO) evaluation was conducted using Mann-Kendall statistical trend analysis, as presented in the 2023 Monitoring Optimization Report. Monitoring Optimization Report identified statistically significant trends (increasing, decreasing, stable, or no trend) for contaminants of concern (COCs), specifically chloride and alkalinity, using groundwater data from 1993–2006 (pre-closure) and 2007–2022 (post-closure). Based on this analysis and the Temporal Trend Decision Rationale (Nobel, 2004), Burnside proposed certain monitoring wells to be removed and sampling frequency to be reduced from semi-annual to annual as shown in Attachment 1- Table 1: Current and proposed Monitoring Program.

The landfill Site is located in Part Lot 21, Concession 4, County of Dufferin, approximately 6 km northwest of the community of Grand Valley. The Site is situated near the southeast corner of Luther Marsh, with the nearest open water body located approximately 800 m northwest, within a significant headwaters area under the jurisdiction of the Grand River Conservation Authority (GRCA). Wetlands located to the north, west, and south of the Site represent the primary potential receptors of any landfill-related impacts, particularly via shallow overburden groundwater flow toward these areas. The Site was licensed to receive municipal solid waste under Certificate of Approval (C of A No. A180601) until 2005, and the C of A was amended on October 9, 2007, to approve the Site Closure Plan.

Considering the presence of potential receptors, including marshes and wetlands located to the north, west, and south of the landfill site, as well as the current status and trends of contaminants of concern in groundwater, the hydraulic characteristics of the overburden aquifer, and the low potential for off-site migration via groundwater flow, the proposed reduction in the number of monitoring wells is considered appropriate. The Technical Review of the Proposed Reduction in Monitoring and Reporting Requirements prepared by Salah Sharif, dated January 3, 2024, also recommends the removal of OW3 and OW2, as OW13 and OW9R provide sufficient coverage to monitor contaminant migration. This reduction is considered adequate to assess the potential for leachate migration in shallow groundwater from the landfill site to the surrounding wetlands.

The proposed revision to reduce groundwater sampling frequency to once per year, alternating between spring and fall was reviewed and not found to be considered appropriate at this time. This approach does not provide a sufficiently representative dataset to accurately track long-term plume behavior and may compromise the reliability and effectiveness of the monitoring program.

Regarding the proposed elimination of surface water monitoring, the reviewer found this proposal to be acceptable. However, the consultant must update the existing contingency plan under the site's closure plan. This update needs to be completed by a Licensed Professional Engineer and submitted to the Ministry for review and approval. The revised plan must clearly outline the actions to be taken if the Performance Monitoring Program identifies changes or increases in Target Analytes above the Reasonable Use Criteria (RUC) for the site.

Finally, the recommendation from Burnside to reduce the reporting schedule was found to be acceptable.

Based on the above, I hereby approve:

- Removal of proposed groundwater monitoring wells, OW2 and OW3 from the monitoring program, as remaining wells provide adequate coverage to assess potential contaminant migration.
- Discontinuation of surface water monitoring at stations SW1, SW2, and SW3, as current evidence indicates no landfill-related impacts to nearby surface water receptors.
- Replacement of the annual monitoring report with a biennial report, equivalent in scope to the current annual report, to be submitted by August 31, 2026, and every two years thereafter.

As identified above, the proposal to reduce groundwater sampling frequency to once annually, alternating between spring and fall, is not acceptable at this time; therefore, semi-annual groundwater sampling shall continue. In addition, the Owner is required to update the Closure Plan contingency measures, prepared and stamped by a Licensed Professional Engineer, to clearly outline the actions to be taken if monitoring identifies exceedances of the Reasonable Use Criteria.

This letter is being issued following a discussion between the ministry and the owner's consultant. It is understood and agreed under section 11 of the Closure Plan.

If you have any questions or concerns, please don't hesitate to contact Environmental Compliance Officer, Halla Salih at (519) 766-7587 or at halla.salih@ontario.ca.

Sincerely,



Aaron Todd,
Director for the purpose of s. 168.6 of the Environmental Protection Act

cc. **E-MAIL ONLY:**

Meghan Townsend- CAO/Clerk - mtownsend@townofgrandvalley.ca

David Hopkins- Senior Hydrogeologist - Dave.Hopkins@rjburnside.com

Attachment 1

Table 1: Current and proposed Monitoring Program

Current Monitoring program	Frequency	Proposed Monitoring program	Frequency	Parameters
Groundwater Monitoring Wells: OW1S, OW1D, OW2, OW3, OW4, OW5, OW6S, OW6D, OW7, OW8, OW9R, OW10R, OW11R, OW12R, OW13 and OW14	Twice per year	Groundwater Monitoring Wells: OW2, OW3 OW4, OW7, OW8, OW9R, OW11R, OW12R and OW13, OW5	Once annually, alternating between spring and fall	Field Parameters: Water level, Temperature, pH, conductivity, TDS, DO and methane. Laboratory Parameters: Alkalinity, Chloride, Conductivity, Nitrite, Nitrate + Nitrite, pH, Sulphate, TDS, Aluminum, Chromium, Cobalt, Copper , Iron , Lead, Magnesium , Manganese, Antimony , Molybdenum , Nickel , Potassium , Selenium , Silver , Sodium , Strontium , Arsenic , Tin , Titanium , Vanadium , Zinc , Barium, Beryllium, Bismuth, Boron, Cadmium, Calcium, Chemical Oxygen Demand , Ammonia, Total Kjeldahl Nitrogen, Phosphorus, Phenols, Organic Carbon and Mercury.
Groundwater Monitoring Wells: OW13	Twice per year	Groundwater Monitoring Wells: OW13	Once annually, alternating between spring and fall	VOC Laboratory Parameters: Benzene, 1,4- Dichlorobenzene, Ethylbenzene, Methylene Chloride, Toluene and Vinyl Chloride
Surface Water Monitoring: SW1, SW2, SW3	Twice per year in spring and autumn	Surface Water Monitoring: SW1, SW2, SW3	Eliminate from program	Field Parameters: Water level, Temperature, pH, conductivity, TDS, DO and methane. Laboratory Parameters: Alkalinity, Chloride, Conductivity, Nitrite, Nitrate + Nitrite, pH, Sulphate, TDS, Aluminum, Chromium, Cobalt, Copper , Iron , Lead, Magnesium , Manganese, Antimony , Molybdenum , Nickel , Potassium , Selenium , Silver , Sodium , Strontium , Arsenic , Tin , Titanium , Vanadium , Zinc , Barium, Beryllium, Bismuth, Boron, Cadmium, Calcium, Chemical Oxygen Demand , Ammonia, Total Kjeldahl Nitrogen, Phosphorus, Phenols, Organic Carbon and Mercury.