

May 20, 2021

Campbell River Environmental Committee (CREC) Concerns with the Comox Regional District Application for a Compost Facility next to the Campbell River Landfill.

A compost facility can be a good project if located in the right place. The Comox Regional District's proposed facility, located on Argonaut Road next to the Campbell River landfill, is not the right place. It is less than 250 meters from the facility's footprint border to the nearest residence's property border. The BC government guidelines for siting of a compost facility is 400 to 1000 meters. See table 4.1 at: <https://www2.gov.bc.ca/assets/gov/environment/waste-management/organic-waste/biosolids/compost-facility-req.pdf>

The guideline may be based on the distance airborne emissions (called odour) have been found to travel from a compost facility. The Canadian National Collaborating Centre for Environmental Health states VOCs (chemicals emitted from plant debris) such as the carcinogens toluene and benzene have been measured 800 meters downwind from a compost facility. P.2 [http://www.nceh.ca/sites/default/files/Odour from compost facility-Feb 2018.pdf](http://www.nceh.ca/sites/default/files/Odour%20from%20compost%20facility-Feb%202018.pdf)

While it is difficult to find an existing compost facility that matches the plan for the Campbell River location, The Campbell River Environmental Committee's (CREC) research finds that the gore cover proposed to be used may not meet the manufacturer's claims of odour control in all cases. Existing compost facilities using the gore cover (Waterproof membrane) at Cobble Hill, Abbotsford and Seattle are experiencing airborne emissions (odour) issues. A facility in Delaware was closed due to the inability to control emissions. P.6 & 7 <https://crecwebcom.files.wordpress.com/2021/05/washington-state-odour-document-2013.pdf>

Another issue in the composting process is possible fires. There have been fires at compost facilities due to the high heat generated in the process. At this site, beside the Campbell River Landfill, the absence of hydrants and a sprinkler system is a concern for fire suppression. This is a heavily forested area. Should a fire reach the crowns of the large trees, it could head to the neighbours or burn northeast to Elk Falls Park. It is important that any facility in this location meets the fire code including hydrants and sprinklers.

<https://crecwebcom.files.wordpress.com/2021/05/2014-143-afrs-201410040202-redacted.pdf>

https://www.aria.developpement-durable.gouv.fr/wp-content/uploads/2018/05/2018-05-14-SY-IncendiesCompostage-PA-Vfin_EN_OK.pdf

So, let's have a compost facility, but in an appropriate location at least at a distance from residences that meets the BC government guidelines. If cancer-causing emissions travel to the neighbours, what are the City of Campbell River, the Comox Regional District and the Ministry of Environment prepared to do about it?

Action Items:

The Comox Regional District has applied to the Ministry of Environment for the Compost Facility permit under the Organic Matter Recycling Regulation (OMRR). You have until June 12, 2021 to comment.

See notice at: <https://crecwebcom.files.wordpress.com/2021/05/compost-facility-for-comment-in-may-12th-mirror-paper.pdf>

Send your comment to:

Authorizations.South@gov.bc.ca

cmakinson@comoxvalleyrd.ca

The Comox Regional District has also applied for Development Permit (DP) to the City of Campbell River. Fire protection is under the DP. Residents will pay an extra fee on their property taxes for the compost facility service.

Development Application at:

<https://crecwebcom.files.wordpress.com/2021/05/p21-32-mjp-dev-ap-map-pkg..pdf>

If you have concerns with this project, you can express your concerns to the City and the Comox Valley Regional District at:

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