

April 8, 2019

Dear Thorlakson Nature's Call Composting and Residents of Airdrie,

This open letter is in response to the April 1, 2019 Facebook post from TNC staff. What a fitting day you chose to 'clear the air.' The irony was not lost on us. Nevertheless, we appreciate that TNC has chosen to make some public statements in support of their operation as this gives the residents of Rocky View a chance to respond. In doing so, we hope that Airdrie residents will learn what we, Rocky View County residents, experience from 'our side of the fence.'

TNC states they are proud of the the fact they have been in operation for almost 50 years. A significant number of the 265 residents who signed the petition, opposing TNC's land use change application, have also been in Rocky View County for that length of time. In fact, many of the petitioners represent family farm operations who have been here twice as long as the Thorlakson operation. We are proud members of the agricultural community and support agriculture - this is our way of life. What we do not support are blatant abuses on the environment and using 'agriculture' to defend or minimize violations, or to cover for your industrial scale composting operation. For readers who have the time please check our website at east.ca to find out just how much of a negative effect the Thorlakson operation has had on its neighbors in Rocky View County during their nearly 50 year history in the area.

From what started out as a well-managed feedlot, the operation has degraded at an ever accelerating rate into one that violates numerous rules and regulations and is a detriment to the entire community. We have never said that cattle carcasses are being composted - we have simply shared publicly what the feedlot has done with their dead cattle for the past decade and what has been known by Rocky View residents for years. The dead cattle could be seen from the road and from Google Earth. The feedlot stockpiled cattle carcasses in the hundreds, over many years, for animals to scavenge, for disease to potentially be spread, and for stench to be created. From the repeated overflow of E-coli laden feedlot runoff into the community watershed, to the stench created from the illegal composting of non-vegetative feedstock from the composting site, the entire history leaves a trail of environmental violations (and no regard for neighbours) that continues to get worse and more frequent with time.

TNC mentions they were approved as a Class I composting facility accepting organic waste. TNC didn't mention their permit only allows for vegetative waste and that they themselves, without any provincial or municipal permits, converted to handling Class II non-vegetative feedstock and have been operating it illegally that way for over five years. So, yes, TNC, you do in fact compost animal flesh because meat, poultry, and fish are part of the green bin waste deposited at TNC. We also say illegally because, comparatively, if someone operates a motor vehicle without a license, they are operating it illegally - even if they claim to know how to drive. Residents of the City of Airdrie need to know that their green bin waste is being handled by a facility, without the appropriate permits, to handle the green bin material, that includes animal flesh, being sent to it. This has led to unwanted stench because the facility is not designed to handle the feedstock being accepted.

TNC made an application in 2018 to expand their facility which was "...operating without the benefit of an approved development permit" (RVC application package) only to find that their illegal operation was additionally violating land use laws. Does this sound like a well-managed organization or one that is being monitored properly? TNC states there had been no complaints prior to 2018 - which we know is completely false. Did TNC ever inquire with any neighbors or respond to the complaints of neighbours that were directed to them? Most farmers give up complaining when nothing happens following the first complaint. Just ask any of the neighboring farmers about filing complaints. A lot of people complained to the wrong governing body or gave up complaining to Thorlakson's - and this continues to this day. No one in the community had complaints about the feedlot manure odour - it was when the stench from the illegal composting became evident about two to three years ago. Neighboring Rocky View County residents all agreed that the stench really started about two to three years ago - and none of them knew that the composting feedstock had changed to include human biowaste from curbside programs and paunch. TNC's application for the land use redesignation taught area residents about what was happening and who to report complaints to.

It is also interesting that TNC has stated publicly there have been no changes in the operation for 30 years – really? The type and tonnage of feedstock waste, including mixed household biowaste, commercial waste and paunch are significant changes to the operation. TNC's letter also states the complaints started in July when the redesignation letters from RVC were sent out - and TNC chose to believe the complaints had to do with the pen cleaning. While residents within the immediate vicinity of TNC received letters from RVC, very few people knew about the expansion, still did not know where the stench was coming from, and did not know who to report to. It wasn't until late November when the petition was started and then one week prior to the hearing on December 11, 2018 (when RVC posted the agenda package) that the community truly started to become aware. We then knew where the stench was coming from and all affected neighbours, many of us meeting for the first time, described the stench in a similar way and could all say that it really began to stink in the past two and a bit years - but we hadn't known where the stench was coming from. Through this process, Rocky View neighbours became aware that the compost facility was operating illegally (in several ways) and that TNC, through their application to change the land designation, would be seeking to expand. The amount of concern from area residents was clearly demonstrated by having 265 signatures on a petition in less than 10 days.

TNC states that Rocky View County amended and passed the land use bylaw to satisfy the concerns of the residents. We were all at the same hearing and if TNC feels the concerns of the residents were satisfied at that hearing, this definitely shows how much they do not know about their neighbors' feelings. Contrary to some statements and accusations made, our community is very much in favor of composting, and arguably much more concerned about the environment than the Thorlakson operation. We most definitely know how devastating the stench can be to our lives, which is probably not fully appreciated by those who don't endure it on a daily basis. We would encourage all interested parties to drive by the Thorlakson operation and smell it for yourselves. We include one caveat - go out there unannounced. If you go to a TNC Open House you will get the tourist version - something like showing your house when you know guests are coming. On tour days there will be no paunch trucks dumping their loads of stench in open piles, all of the fresh windrows will be fully covered and undisturbed. We, as neighbors, appreciate Thorlakson tour days

and Bullpen events because we know there will be no stench on those days. We are, however, likely to experience even greater stench in the days following because piles that have gone anaerobic are then turned and the facility plays catch-up.

We have also become informed enough, through reading literature and talking with composting experts, to know two items critical to this issue. One - composting can be achieved, with no offensive odours, when the proper composting technology is used. Two – there is no known open-air composting operation that has been successful at processing non-vegetative feedstock. Think about that carefully - if you have the opportunity to ask any composting technology expert you will find that the Thorlakson open-air facility is the most basic, archaic, and inexpensive method and NOT capable of processing non-vegetative feedstock without odour issues for surrounding residents. Recall the terms that their manager used a short time ago - "We're open to improving in any way as long as it's something we could afford to do." <https://bit.ly/2uEQAj2>. We are not aware of affordability being a valid argument for continuing to break environmental laws. For an example of effective composting for the same range of feedstock delivered to the Thorlakson site, and that DOES NOT emit offensive odours, you simply have to tour the Calgary facility a few kilometers south of here.

TNC claims they have made changes to reduce offensive odour emissions and the number of complaints have reduced. As stated previously, many Rocky View residents have stopped communicating directly with TNC as this 'restorative opportunity' doesn't work. When we complain to TNC they give some other explanation for the stench or deny it all together - usually they say it's something associated with the feedlot. It is our opinion that the odour issues and frequency have not changed; our continued calls to Alberta Environment and Parks is evidence of this. Again just ask anyone who lives close to the operation, or several kilometers away to the east and south in the wind belt of this operation, and you will hear the truth. TNC claims they have purchased better equipment and began monitoring favourable weather conditions to deal with problematic material. What this actually means is, TNC deals with anaerobic, stinky material on days when the wind is not blowing into Airdrie - so too bad for Rocky View Neighbours. We are fewer in numbers, therefore our concerns and complaints aren't legitimized.

We can only imagine how bad it will be if the facility is allowed to double or triple in size - and then no amount of weather monitoring will change control for direction of stench. Airdrie will gain the notoriety of Brooks or Strathmore. TNC is 'excited' about the aeration system they are incorporating - perhaps they haven't been reading and researching enough. Harvest Power in Richmond tried the same technology in their open-air composting facility (also handling non-vegetative waste) and it failed: <https://bit.ly/2lhrWgw>. Harvest Power is now being shut down and fined because of their continued odour emission infractions: <https://bit.ly/2OUzffx>. The same happened with the Cedar Grove, an open-air facility in Washington state who also used the same technology that TNC plans to incorporate. Cedar Grove came under fire for stench, was sued and had to invest millions - and they still stink: <https://bit.ly/2OXo8Ta>. A class action lawsuit against Cedar Grove was launched with a settlement fund of nearly 1.5 million in fall of 2018: <https://bit.ly/2UllgnF>.

Nothing of substance is mentioned by TNC regarding water contamination and leachate. The fact that both TNC and the feedlot are located above sensitive aquifer is highly concerning to area

residents. Since 2008, Thorlakson has received two emergency orders and two enforcement orders from the Natural Resources and Conservation Board, as well as a letter of warning from Alberta Environment regarding their use and abuse of water. Look at <http://easts.ca/backstory-infraction-history/> for further details. If TNC is testing for groundwater contamination in the same way that Dillon Consulting did for odour, we are justifiably concerned. How do we know that the wells being tested are the ones linked to the springs, creeks and sensitive aquifer which mingles with the groundwater that is potentially connected to our homes? Are the wells being tested consistently and accurately? We don't want the wells to become polluted between tests and neighbours becoming sick or dying because of polluted well water. Please read our review of the groundwater situation at this composting/feedlot site on our web page www.easts.ca. We would welcome any expert opinion we can get on this issue.

TNC say they have hired Engineered Composting Systems (ECS) which is an American firm based out of Seattle. We wonder why TNC didn't hire Associated Engineering, the Canadian company with offices in Calgary, who designed the Calgary Compost facility? Regardless, we hope TNC follows through on ECS' recommendations, which are likely to be costly. (Cedar Grove didn't follow ECS' recommendations <https://bit.ly/2WUsfBV> and instead went with an aeration system; we know where that got them.) On ECS' website they also share their affiliation with the Regional Compost Facility in the Okanagan, a joint venture between the City of Vernon and Kelowna, which has been in operation since 2006. Of note, in the summer of 2018, the province of British Columbia demanded an additional \$300,000 upgrade to the facility (with a projected total cost of \$800,000) over concerns that the Regional Compost Facility was not engineered to properly protect groundwaters. As mentioned, with TNC being located above sensitive aquifer, we believe any composting operation located there must be over engineered to ensure groundwater protection and hope that ECS will consider this. We also question TNC investing (according to them) \$500,000 on upgrades when they haven't even received authorization by way of a Development Permit from Rocky View County yet.

TNC claims that, according to their research, "...normal healthy individuals suffer no increased health risks from working at or living near a compost facility." First of all, Rocky View Neighbours who do have serious medical conditions, such as cancer and autoimmune illnesses, are deeply offended. Not only is TNC seemingly dismissive of the health needs of the community in which they operate, they are wrong on the potential health effects. A comprehensive literature review conducted by Cornell University <https://bit.ly/2UkJwri> found a number of health concerns for workers such as: "Acute and chronic respiratory health effects, mucosal membrane irritation, skin diseases and inflammatory markers were elevated...". With regards to area residents the research indicated, "Composting activities do emit bioaerosols at levels which can pose a hazard to susceptible members of the public." Further, although the research is currently limited, in general it appears that "...exposure to bioaerosols can be associated with a wide range of adverse health effects." It is important to note that research conducted on different compost facilities will yield different results and scientific data can be interpreted in ways meant to suit corporate purposes. Questions to ask include: is the facility enclosed, in-vessel, or open-air? Is the facility processing vegetative only materials or mixed human waste, animal feces and animal products/flesh (such as meat, fish, poultry and shellfish scraps) as found in green bin programs?

TNC keeps trying to confuse the stench issue by blaming the odors on the feedlot. The feedlot is not our issue. We are farm families and are very familiar with the smell of manure. We have been very clear about this all along - as well as stating publicly that the feedlot's delayed pen cleaning in the summer of 2018 had nothing to do with our odour complaints. The stench we endure is NOT the smell of manure - and it is extremely offensive. That TNC staff would suggest Rocky View Neighbours are reporting stench when there is none, or that we would encourage others to report stench when there is none, is even more offensive. The constant discrediting of Rocky View Neighbours is why TNC no longer receives complaints directly from us. In no other instance would the victim be required to report infractions to the offender. Attempting to discredit Rocky View neighbours is shameful and is a further insult to what we already endure from TNC. If this is meant to cause dissension amongst Rocky View Neighbours, it's not working.

As a final note, throughout North America, new legislation is being introduced to control the odour emissions from marijuana facilities. Case in point, Rocky View County recently turned down a proposal to build a marijuana facility because of odour concerns. We ask then, where an equal concern from Alberta Environment and Parks, Rocky View County or the City of Airdrie regarding odour, water and the associated health risks for residents from this open-air compost facility? What has actually been demonstrated to Rocky View Neighbours is that Thorlaksons continue to operate, without the appropriate permits in place, all the while receiving help from government to do so. The whole situation stinks and is disgraceful.

If you have read this document in its entirety and reviewed the imbedded links, we thank you. We hope you now have a better understanding of things from our side of the fence.

Sincerely,

RockyView Neighbours