



April 3, 2020

## Memorandum

To: Client Services and Permissions Branch, Ontario Ministry of the Environment,  
Conservation and Parks, 135 St. Clair Avenue West, 1<sup>st</sup> Floor, Toronto, ON

*Submitted Online: Via Environmental Registry of Ontario website*

From: Kyle Davis, Risk Management Official, Township of Centre Wellington

**RE: Environmental Registry Number 019-1336, Polycorp Ltd. Environmental Compliance Approval (sewage) – 33 York Street West, Elora**

## General

The following comments are related to the above referenced Environmental Compliance Approval (ECA) application that was posted on the Environmental Registry of Ontario (ERO) on February 20, 2020 (ERO reference number 019-1336 and Ministry reference number 3900-B9CLMJ). The public commenting period ends on April 5, 2020.

These comments are provided in regards to the Clean Water Act, Grand River Source Protection Plan and source water protection implementation by Wellington Source Water Protection, a partnership of the Wellington County municipalities. These comments should not be construed as a hydrogeological, engineering, ecological or technical review of the application. These comments are strictly provided in regards to our municipality's role in implementing the Clean Water Act and municipal source water protection.

It is understood that Polycorp Ltd., a rubber products manufacturing facility, has applied for a new Environmental Compliance Approval (Industrial Sewage) for its location at 33 York Street West, Elora in the Township of Centre Wellington. The ECA application is for the existing stormwater management works on-site including a system of swales, culverts and storm sewers that discharge stormwater to the roadside ditch. It is understood that a draft ECA is not available for review at this time. This was requested via email from the Ontario Ministry of the Environment, Conservation and Parks and the undersigned was informed it is not available.



## Water Quality Wellhead Protection Areas

1. The subject property is located within a Wellhead Protection Area C (WHPA-C), 5 year time-of-travel, as well as a Wellhead Protection Area D (WHPA-D), 25 year time-of-travel, with a vulnerability score 6 for Elora well 3 (E3). The applicable source protection plan is the Grand River Source Protection Plan. The property has been identified as not being in a Highly Vulnerable Aquifer (HVA). The attached map (WHPA\_Map\_33YorkStW) shows the applicable vulnerable areas, as defined by the *Clean Water Act*, 2006, applicable to the subject property.
2. Additionally, new, draft delineations of the municipal WHPAs have been modelled and, though currently not approved by the Ministry of the Environment, Conservation and Parks, they are planned to be submitted to the Province for approval in 2020. Further, a new Issues Contributing Area for chloride has been declared for the E3 well in Elora. This ICA is the result of an ongoing monitoring program which indicates elevated chloride concentrations in some of the municipal drinking water wells in both Elora and Fergus. The attached map (WHPA\_Map\_33YorkStW\_Draft) shows the new vulnerable areas, as defined by the *Clean Water Act*, 2006, applicable to the subject property. Once approved, the property will be located within a WHPA-B, two year time of travel with a vulnerability score of 8 and the Issues Contributing Area for chloride. Please also note that draft policies that are applicable to the issuance of this ECA are also planned to be submitted to the Province for approval in 2020.

For further information please go to:

**For Assessment Report, including maps**

[http://www.wellingtonwater.ca/en/wswp-resources/resources/GRSPA\\_AR\\_updated\\_S6\\_Wellington\\_highlighted.pdf](http://www.wellingtonwater.ca/en/wswp-resources/resources/GRSPA_AR_updated_S6_Wellington_highlighted.pdf)

**For Source Protection Plan policies**

[http://www.wellingtonwater.ca/en/wswp-resources/resources/GRSPA\\_SPP\\_updated\\_S7-Wellington\\_highlighted.pdf](http://www.wellingtonwater.ca/en/wswp-resources/resources/GRSPA_SPP_updated_S7-Wellington_highlighted.pdf)



3. In drafting the ECA for the subject property, it is recommended that the Ministry consider that the subject property will be located in the new, draft WHPAs and especially the ICA for chloride. The existing stormwater works will be a significant drinking water threat within the ICA, therefore, it is recommended that appropriate conditions be added to the ECA to manage the significant drinking water threat. The municipality requests the opportunity to comment on the draft conditions related to the significant drinking water threat.

### **Water Quantity Wellhead Protection Areas**

4. The property is completely located within a significant groundwater recharge area (SGRA). An SGRA is an area where greater than normal recharge of water down to the aquifer is occurring. Please see attached map (WHPA\_Map\_33YorkStW\_Q). It is recommended that the Ministry consider the presence of the significant groundwater recharge area on the property as well as the property's location within an ICA for chloride and not approve any sewage works that would recharge chloride impacted stormwater into the groundwater. Due to the lack of information available on the ERO, it is unknown whether any of the existing stormwater works infiltrate water.
5. The applicant should note that the subject property is within a Wellhead Protection Area Q (WHPA-Q) that was presented to the Lake Erie Source Protection Committee as part of a Tier 3 water budget study. Please see attached map (WHPA\_Map\_33YorkStW\_Q) The results of that study and the full report are publicly available at <https://www.sourcewater.ca/en/index.aspx>. It is noted, however, that the study has not yet been incorporated into the Grand River Source Protection Plan or Assessment Report and therefore the WHPA-Q is not currently in legal effect or in the County in Wellington Official Plan schedules. Further information can also be found at <http://www.wellingtonwater.ca/en/how-does-this-affect-me/tier-3-water-budget-studies.aspx>.
6. A project is currently ongoing by Grand River Conservation Authority, County of Wellington, the Township of Centre Wellington and other municipalities to complete the steps necessary to update the Grand River Source Protection Plan and Assessment Report with these policies. The draft policies are scheduled for public consultation in



2020 and Ministry Source Protection Branch staff are involved in the review of the policies.

If you require further information, please contact:

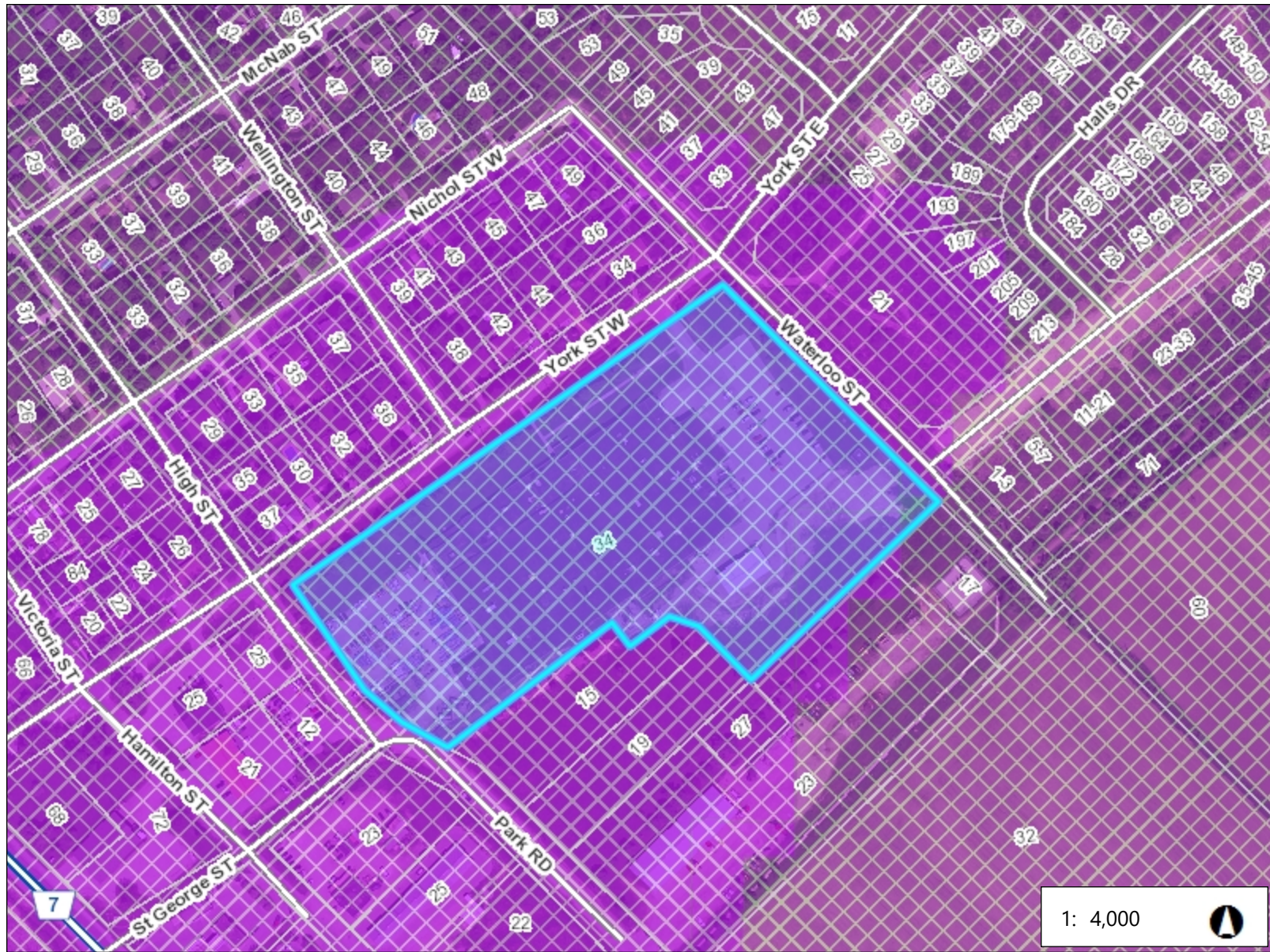
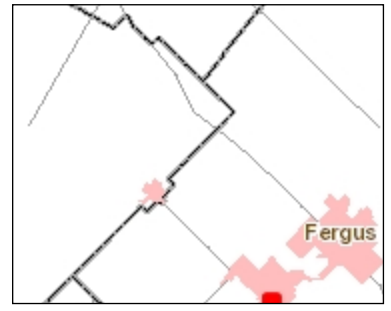
Kyle Davis, Risk Management Official

519-846-9691 ext 362

[kdavis@centrewellington.ca](mailto:kdavis@centrewellington.ca)







**Legend**

- Parcels
- Roads**
  - Local Road
  - County Road
  - Highway
- Waterbodies
- Watercourses
- Municipalities
- Ontario - Urban Centres
- Well Locations
- Q1 and Q2 Boundary
- Q1 and Q2
  - Approved
  - Draft
- SGRA
- RoadsLookup

0.2 0 0.10 0.2 Kilometers

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. Produced using information under License with the Grand River Conservation Authority. Copyright © Grand River Conservation Authority, 2016.

Notes