

May 15, 2020

Resource Development Coordinator
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Public Works

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RE: Proposed amendments to Ontario Regulation 244/97 and the Aggregate Resources of Ontario Provincial Standards under the *Aggregate Resources Act*

Region of Peel – Supplemental Comments

Dear Resource Development Coordinator:

Thank you for the opportunity to review and comment on the proposed amendments to Ontario Regulation 224/97 and the Ontario Provincial Standards under the *Aggregate Resources Act*. The Region of Peel provided an original set of comments dated March 23, 2020. Below you will find additional supplemental comments to be considered along with the March comments.

The following comments pertain to Groundwater and Source Water Protection:

1. The technical document is proposing applicants to have groundwater levels monitored for only a one-year period, which the Region of Peel considers is too short to properly determine cumulative impact to water table and water supply sources (both municipal and private supply). Most of the guidelines currently require a minimum of 2 or 3 years of monitoring for stabilising the water table to operate. **Therefore, the Region recommends the Ministry keep the current standard of 2 or 3 years water level monitoring to properly establish the water table.**
2. The proposed condition requiring dust suppressant, “water or another provincially approved dust suppressant”, may contribute to chloride concentrations where approved dust control includes chloride solutions. While aggregate excavation operations located in wellhead protection areas are subject to source protection plan polices where activities include prescribed drinking water threats e.g., handling and storage of fuel, application of road salt, etc., there is currently no mechanism under the source protection framework to manage and mitigate potential risks of chloride based dust suppressant.

The concern with dust suppressant containing chloride compounds is a shortcoming of the Director’s Technical Rules and the Table of Circumstances

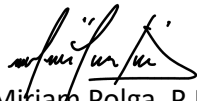
that currently only considers the “application, handling and storage of road salt” as a prescribed drinking water threat. The chemical of concern identified by the *Clean Water Act*, is sodium and chloride. We would encourage the Ministry of the Environment, Conservation and Parks to amend the Director’s Technical Rules and change the prescribed threat to “winter maintenance/dust suppressant chemicals” and defined the term in the regulation. This proposed change meets the objective of proactively protecting municipal drinking water supplies.

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Best Regards,



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