



February 22, 2021

Memorandum

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

Submitted Online: Via Environmental Registry of Ontario website

CC: Matt Aston, Director of Operations, Darren Jones, Chief Building Official, Township of
Wellington North

RE: **Environmental Registry Number 019-2944 and Ministry reference number 5866-
BUTN46, 2738330 Ontario Inc., Environmental Compliance Approval (sewage)
399 Main Street North, Mount Forest**

1. 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 January 8, 2021. These comments are provided in regards to the *Clean Water Act*, Saugeen, Grey Sauble, Northern Bruce Peninsula 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.

Summary of Source Protection Vulnerable Areas and Drinking Water Threats

2. The subject property is located in:
 - a. Wellhead Protection Area A (WHPA-A), the 100 metre setback from the municipal well and Wellhead Protection Area B (WHPA-B), 2 year time-of-travel (Figure 1)
 - b. has high vulnerability scores of 10 and 8 (Figure 1)
 - c. is not in a Highly Vulnerable Aquifer (HVA) (Figure 1)
 - d. is located within a significant groundwater recharge area (SGRA) (Figure 2).



3. The Township and Wellington Source Water Protection completed a review of the site plan and building permits application under section 59 of the *Clean Water Act* to determine proposed significant drinking water threats under their jurisdiction.
 - a. Prior to site plan application, the proponent contacted Wellington Source Water Protection about the location of the fuel storage tanks. The planned location was prohibited, therefore the fuel tanks were relocated outside of the WHPA-A.
 - b. Dense non-aqueous phase liquids (DNAPLs) are prohibited to be stored or handled on the property.
 - c. Other prescribed drinking water threats, including the storage of fuel, the application and storage of road salt, the storage of snow and the storage of waste are considered low or moderate threats in this area, therefore under section 4.9.5.4 of the Wellington County Official Plan, the proponent was required to submit a drinking water threats disclosure report and an associated Chemical Management Plan (CMP) for all chemicals that were indicated in that report, in this case the products stored in the convenience store, as well as the liquid fuel stored on site. The CMP includes a spills response plan and all three documents have been completed to the satisfaction of the Township.

Recommendations

4. The Ministry should note that the entire property is located within 140 metres of the municipal well on Sligo Road (Figure 3) and that within the portion of the property within score 10, the sewage works/drainage catchment may be considered a significant drinking water threat. The Ministry should determine whether the proposed sewage is a significant drinking water threat. Regardless of whether the sewage works is a low, moderate or significant drinking water threat, the Ministry is requested to consider terms and conditions in the ECA to manage the potential risk to the municipal well from the sewage works including:
 - a. regular maintenance, monitoring and inspections by the owner to protect water quality,
 - b. direction to the owner that their property is located within a vulnerable area for the municipal wells and
 - c. the requirement for a spill response plan including instructions on how to report spills to the Ministry's Spills Action Centre and notification to the municipality.



5. It is further recommended that the Ministry consider the presence of the significant groundwater recharge area on the property and, if necessary, add conditions to the ECA to encourage recharge of contaminant-free water, such as roof runoff, to the aquifer.

If you require further information, please contact one of the undersigned:

Sincerely,

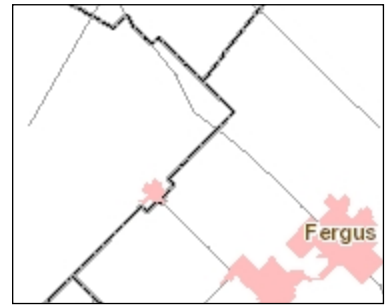
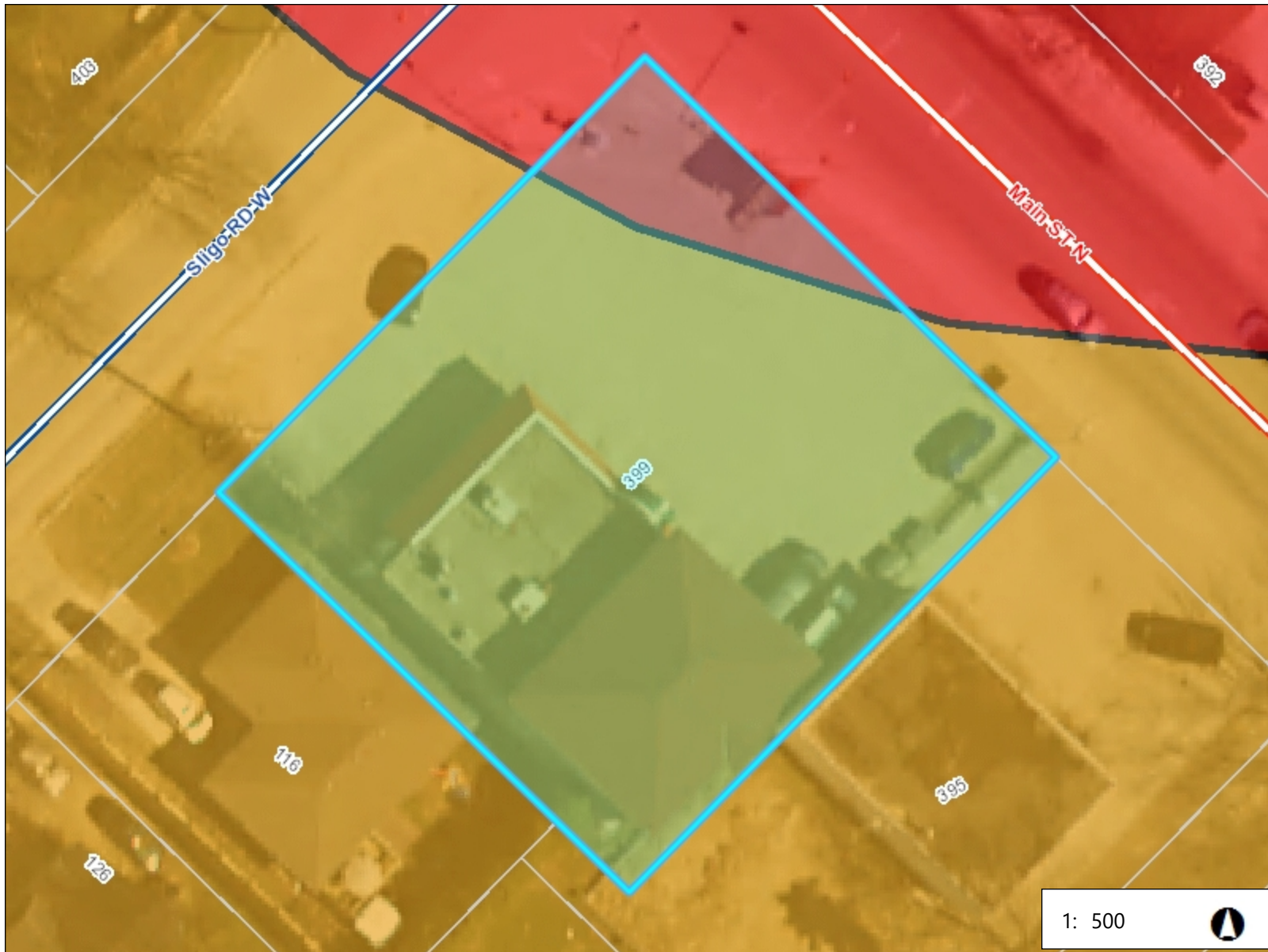
Emily Vandermeulen, Risk Management Inspector
519-846-9691 ext 365
evandermeulen@centrewellington.ca

Kyle Davis, Risk Management Official
519-846-9691 ext 362
kdavis@centrewellington.ca

Attachment 1 – Figure 1: Wellhead Protection Area map

Attachment 2 – Figure 2: Significant Groundwater Recharge Area

Attachment 3 – Figure 3: Distance to well



Legend

- Parcels
- Roads**
 - Local Road
 - County Road
 - Highway
- Waterbodies
- Watercourses
- Well Locations
- Wellhead Protection Area Boundaries**
 - A
 - B
 - C
 - D
- Vulnerability Score**
 - 10
 - 8, D; 8; 8, C
 - 2, 4, 6 (A, B or C)
 - 2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,
- HVA RoadsLookup

1: 500

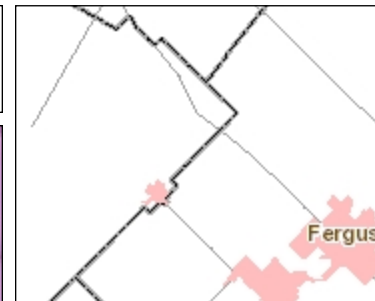
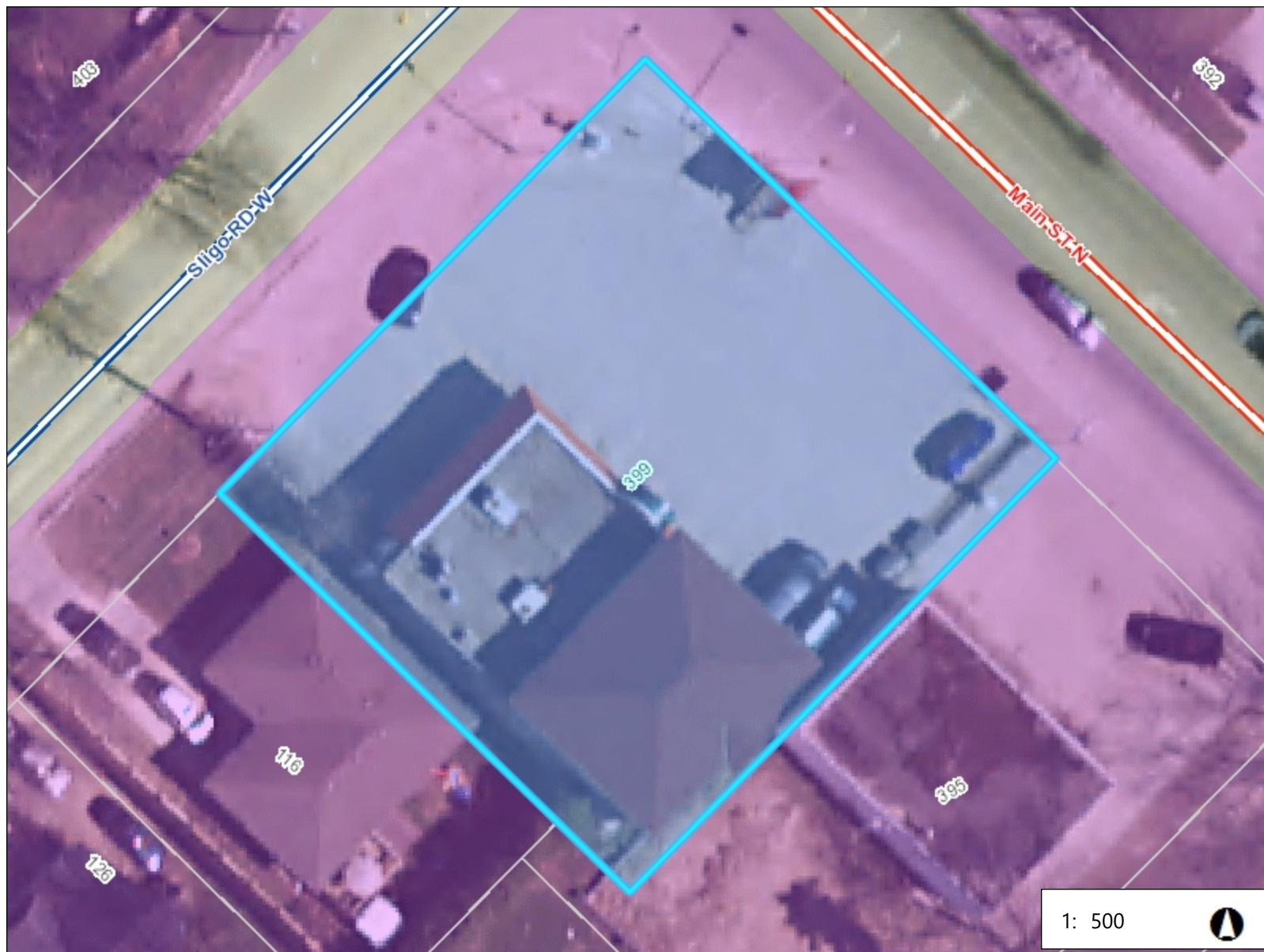
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Notes



Figure 2



Legend

- Parcels
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 - Local Road
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- Well Locations
- SGRA
- RoadsLookup

1: 500

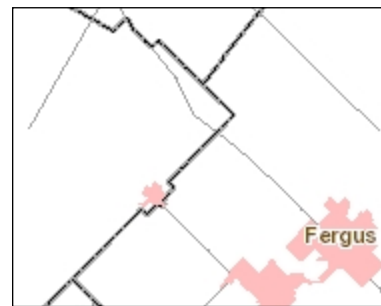
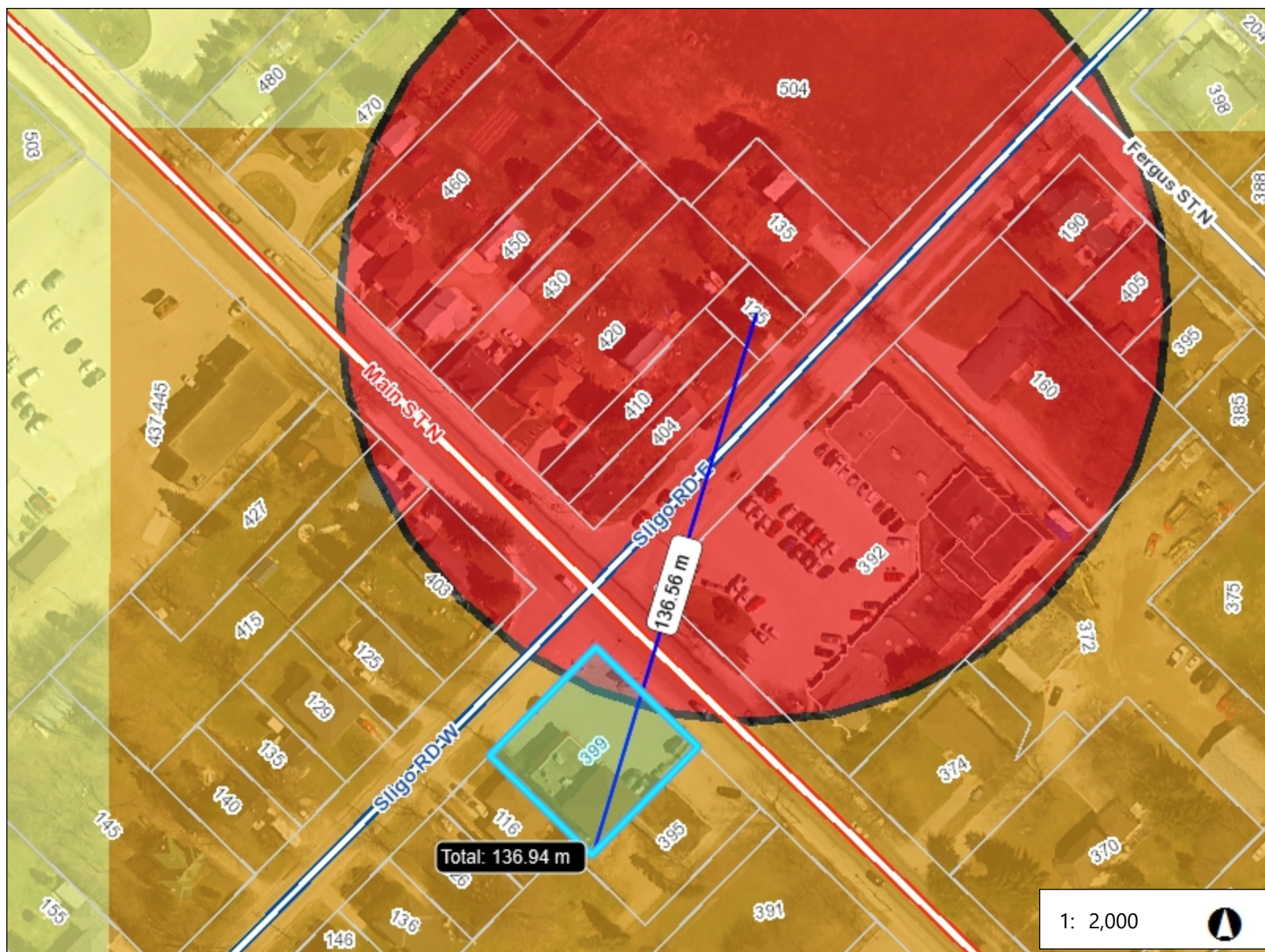
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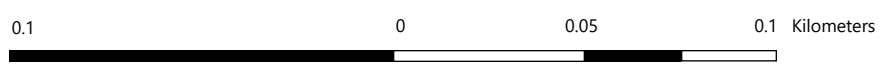
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