

Whitewater Raw Sewage Dumping

June 7, 2021

Carolyn Coulson
Senior Program Advisor
Ministry of the Environment and Climate Change
2430 Don Reid Drive
Ottawa, Ontario
K1H 1E1

Dear Ms. Coulson

Re Site Location: 18-OTT- 70430, 1444 Zion Line, Lot 7, Concession 3 eml, Whitewater Township, Renfrew County, MacGregor's Home Farm

We are a group of concerned citizens of Whitewater Region wishing to take issue with the above application submitted for renewal of Septic Tank dumping of raw sewage on the above dumping site within our community. We have requested documentation from your office so that we may view the required site records. It is our contention that 'full compliance' within the terms and conditions of ECA for the above mentioned license are not being fully met.

Under 'RECORD KEEPING' item 18, We understand that the service provider must maintain a log book documenting how much Hauled Sewage was spread on the Site. Auditing the billing records of the septic Tank Pumping business may be a more accurate way to determine quantities.

Under 'OPERATIONS' Item 14 states that Hauled Sewage shall only be spread at the Site at the lower of fifteen (15) litres per square metre per seven (7) days or such other lower rate which ensures that ponding at, puddling on or runoff from the Site does not occur. This section of the Environmental Compliance Approval application gives way to questionable compliance.

Under 'OPERATIONS' Item 10c it is stated that no Hauled Sewage shall be spread at the Site when conditions are such that Hauled Sewage, or water contaminated by Hauled Sewage, may runoff or discharge from the Site. The site where the sewage is dumped, is on a slope leading to a waterway (creek).

Under 'OPERATIONS' Item 11 it is stated that spreading of Hauled Sewage is prohibited in areas at the Site with a maximum sustained slope of greater than 9%. We are not at liberty to walk and measure private property. It is our contention that the slope in questions is greater than 9%.

Under 'OPERATIONS' Item 13 it is stated that prior to spreading of hauled sewage at the site, the operator shall ensure the useable spreading area is clearly flagged, digitally designated in GPS such that the designation is readily available upon the request of a Provincial Officer, or similarly marked so as to clearly identify setbacks from sensitive features and any areas where spreading is prohibited pursuant to Condition 12 of the Approval. There is no signage posted for Raw Sewage Dumping as stated in the Official Plan requirement.

Of concern is that this site has been utilized for over a 30 year period as a raw sewage dumping ground. Under the guidelines set forth by MOE we would expect limitations on concentrated usage over the years. Please comment. Has the ground been tested for high concentrated levels of chemicals, metal and plastics of recent date? Surely over this period of time we would anticipate questionable levels.

In addition at the same Site multiple cement trucks arrive daily (during active months) of excess cement onto this property. One days account showed 25 cement trucks heading for this Site. The excess contents are dumped into a hole on the land which is zoned RU Agricultural. On a site visit would the agency approve of this type of cement dumping? Who will have the responsibility in the future for the cost of cleaning up the site.

Under Exhibit C we are presenting notations from residents in and around the Site(s) areas that also share our concerns.

As a solution, we have asked that all Septic Tank Pumping Services take raw sewage to the Treatment Plant for Processing. A number of Service providers in our area are already following this procedure. We are asking that all Service providers do the same. Please note that those service providers that utilize the services of the Treatment plant charge less than the applicant. We have been advised by the Treatment Plant that they have adequate capacity to handle all raw sewage from this area.

ADDITIONAL DOCUMENTATION

Exhibit D: Map of Watershed Systems in and around the dumping Site(s).

All dumping Sites (4 in total) are within one square mile. Neighbours living within this designated area are concerned about the environmental impact of spreading large amounts of raw sewage in a concentrated area over many years and the possible contamination of their wells and environmental safety. Further that due to the small geographical dumping area we are experiencing enhanced truck traffic re: hauling with four sites (plus the cement truck traffic) and this excessive activity will impact our children's safety and real estate values

We would urge MOE to respond to our concerns prior to any action being taken on approving this and other Site applications in our area.

Respectively

Concerned Whitewater Residents

Karen Caldwell, Lynne Langton, Louise Johnston (supportive resident Emails and Facebook responses to date)