

May 27, 2021

## 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: Emily Vandermeulen, Risk Management Inspector, Township of Guelph/Eramosa

From: Kyle Davis, Risk Management Official, Township of Guelph/Eramosa

**RE: ERO Number: 019-3499 (Ministry Reference Number 1000101709),  
Snork's Septic Service  
Environmental Compliance Approval – Application of Hauled Sewage to Land  
7922 Speedvale Avenue East, Guelph/Eramosa Township**

## General

1. The following comments are related to the above referenced Environmental Compliance Approval (ECA) application. This is an application for a new approval.
2. 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. Our individual municipalities may have separate comments including technical review, therefore, 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.
3. The subject property is located in a:
  - a. Wellhead Protection Area C (WHPA-C), 5 year time-of-travel, with a moderate vulnerability score of 6, for the City of Guelph municipal wells;
  - b. Significant Groundwater Recharge Area (SGRA), partially; and
  - c. draft Wellhead Protection Area Q (WHPA-Q) with a significant risk level for the City of Guelph municipal wells.

The property is not located within a Highly Vulnerable Aquifer. The applicable source protection plan is the Grand River Source Protection Plan – Wellington County Chapter. It is

recommended that Ministry staff consider these vulnerable areas in their evaluation of the ECA. Please see attachments 1-3 for vulnerability zone mapping.

4. There are no significant threat, water quality policies that affect the subject property, as the only threat possible is the handling and storage of dense non-aqueous phase liquids, an activity which is unlikely to be occurring on this site. The application of hauled sewage to land is considered a low threat activity in a WHPA-C with a score of 6. There are no low or moderate threat policies in the Grand River Source Protection Plan. We request that consideration be taken, while reviewing this application, of the location of this property within a wellhead protection area, within three kilometres of the closest well, and within 1100 metres of a new municipal well site identified in the City of Guelph's Water Supply Master Plan (see attachment 4).
5. Draft water quantity policies are currently under development to be added to the Grand River Source Protection Plan to manage consumptive water taking and recharge reduction activities within the WHPA-Q. It is unlikely that these policies would affect this site.

Based on the information provided in this application and its supporting documents, as well as the comments outlined above, it is recommended that the Ministry consider the recommendation in comments 3 and 4 while reviewing this ECA application and add terms and conditions to the ECA as appropriate.

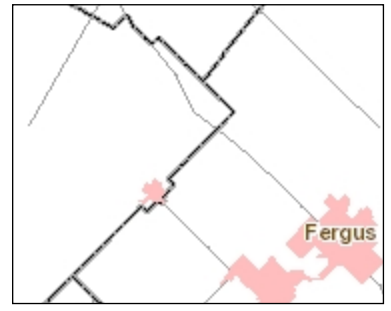
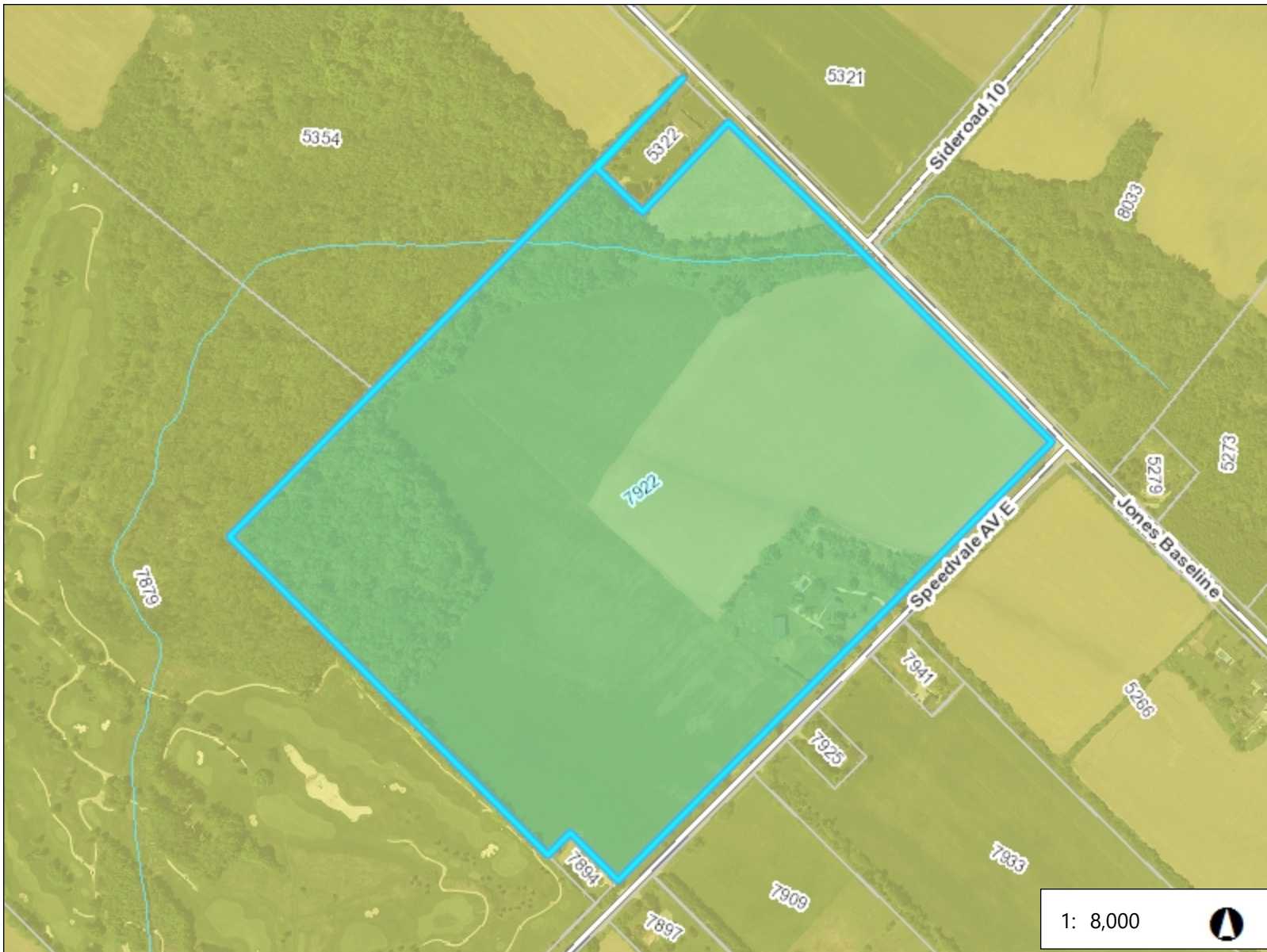
If you require further information, please contact one of the undersigned:

Sincerely,

Emily Vandermeulen, Risk Management Inspector  
519-846-9691 ext 365  
[evandermeulen@centrewellington.ca](mailto:evandermeulen@centrewellington.ca)

Kyle Davis, Risk Management Official  
519-846-9691 ext 362  
[kdavis@centrewellington.ca](mailto:kdavis@centrewellington.ca)

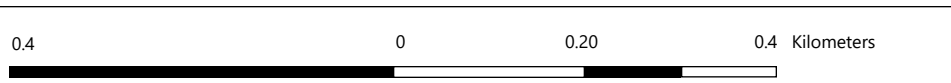
Attachment 1-3 – Vulnerable area mapping  
Attachment 4 – Distance to well mapping



### 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

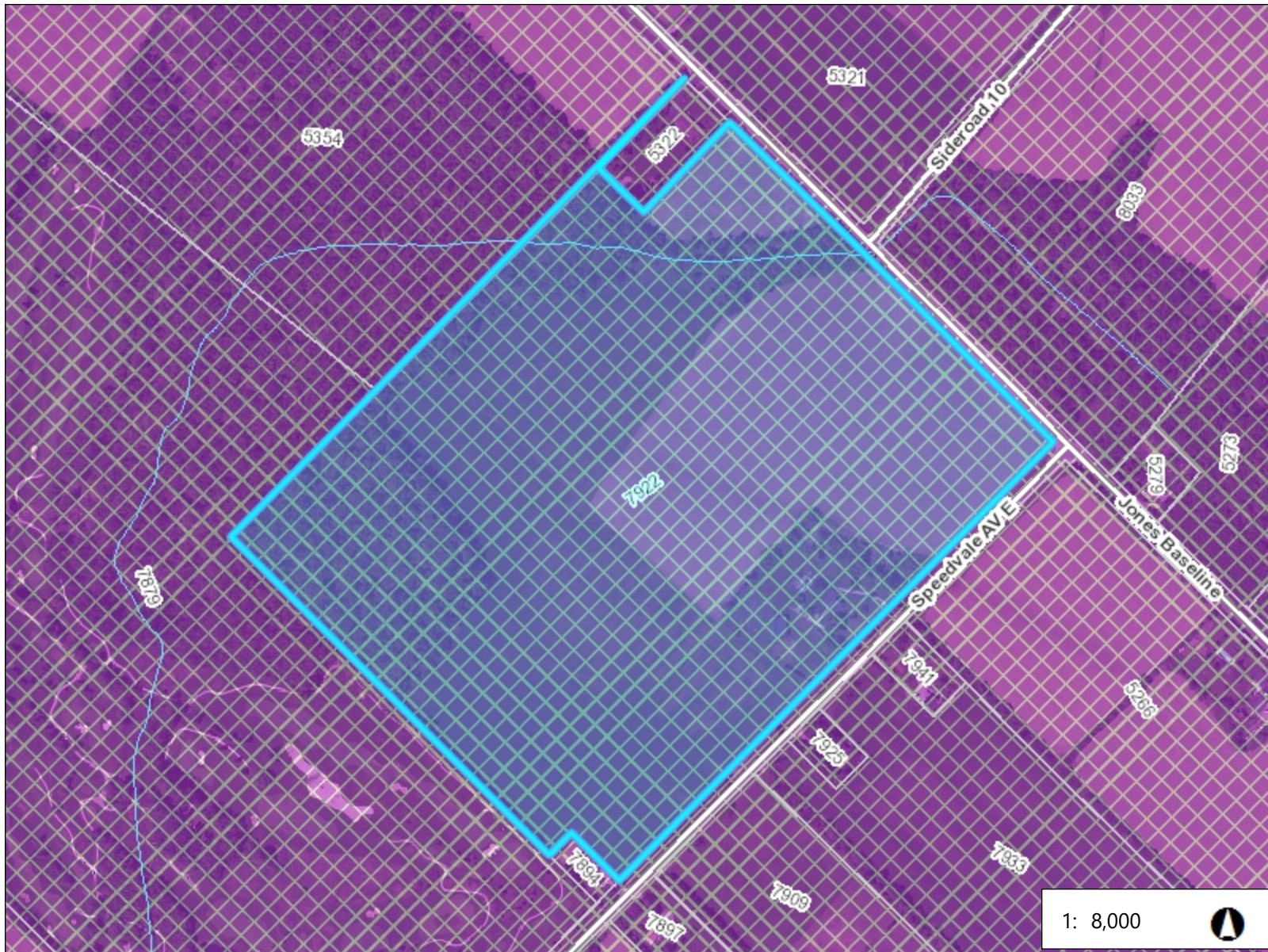
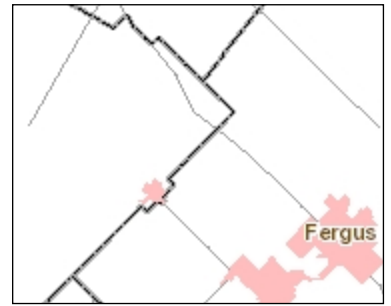
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Notes



**Legend**

- Parcels
- Roads**
  - Local Road
  - County Road
  - Highway
- Waterbodies
- Watercourses
- Well Locations
- Q1 and Q2 Boundary
- Q1 and Q2
  - Approved
  - Draft
- RoadsLookup

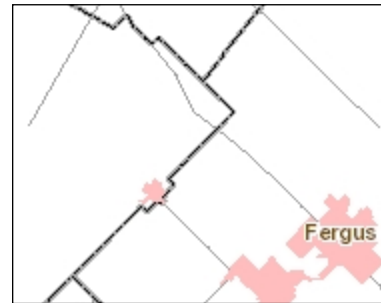
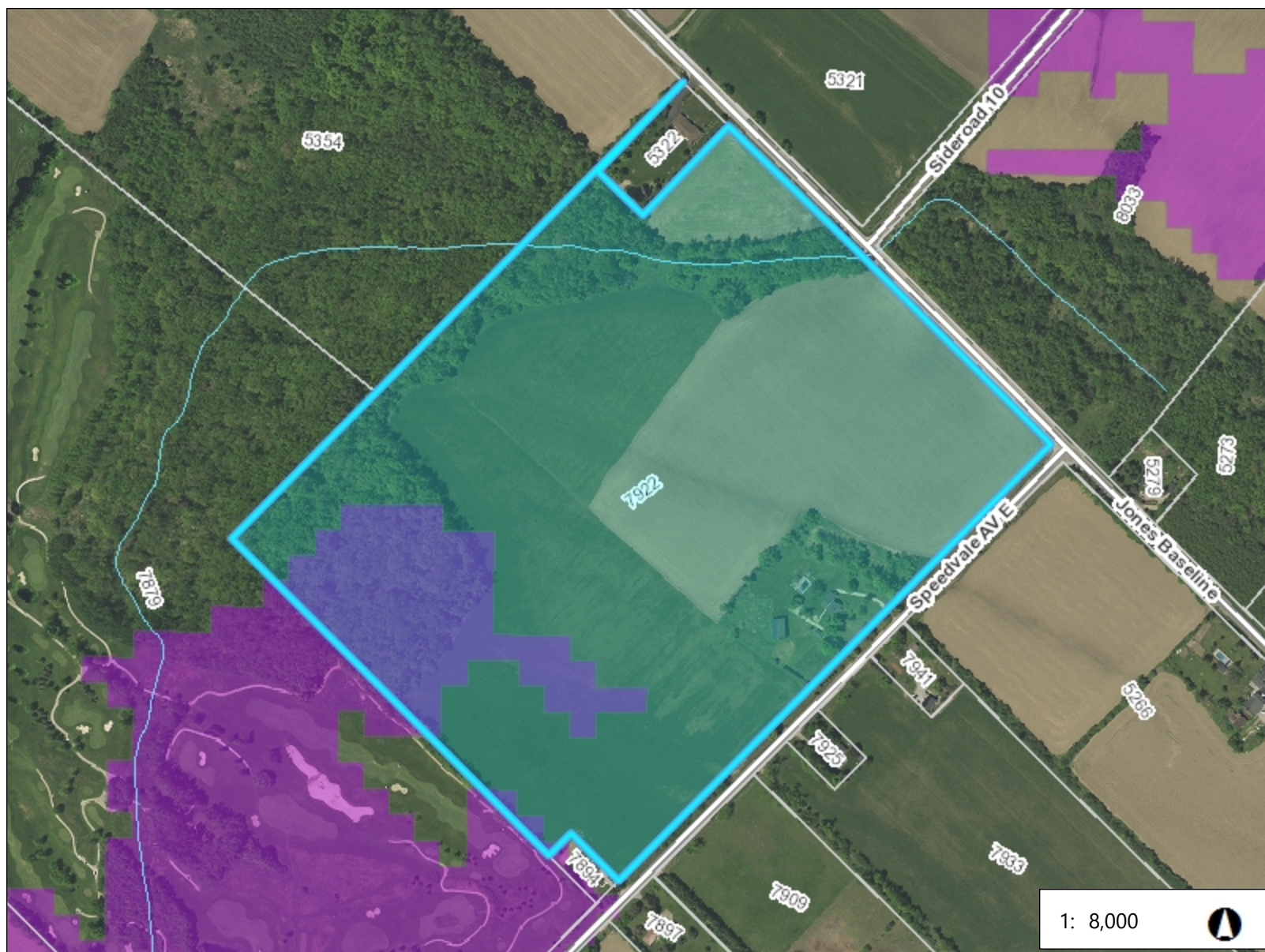
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0.4 0 0.20 0.4 Kilometers









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THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2018

**Notes**



**Legend**

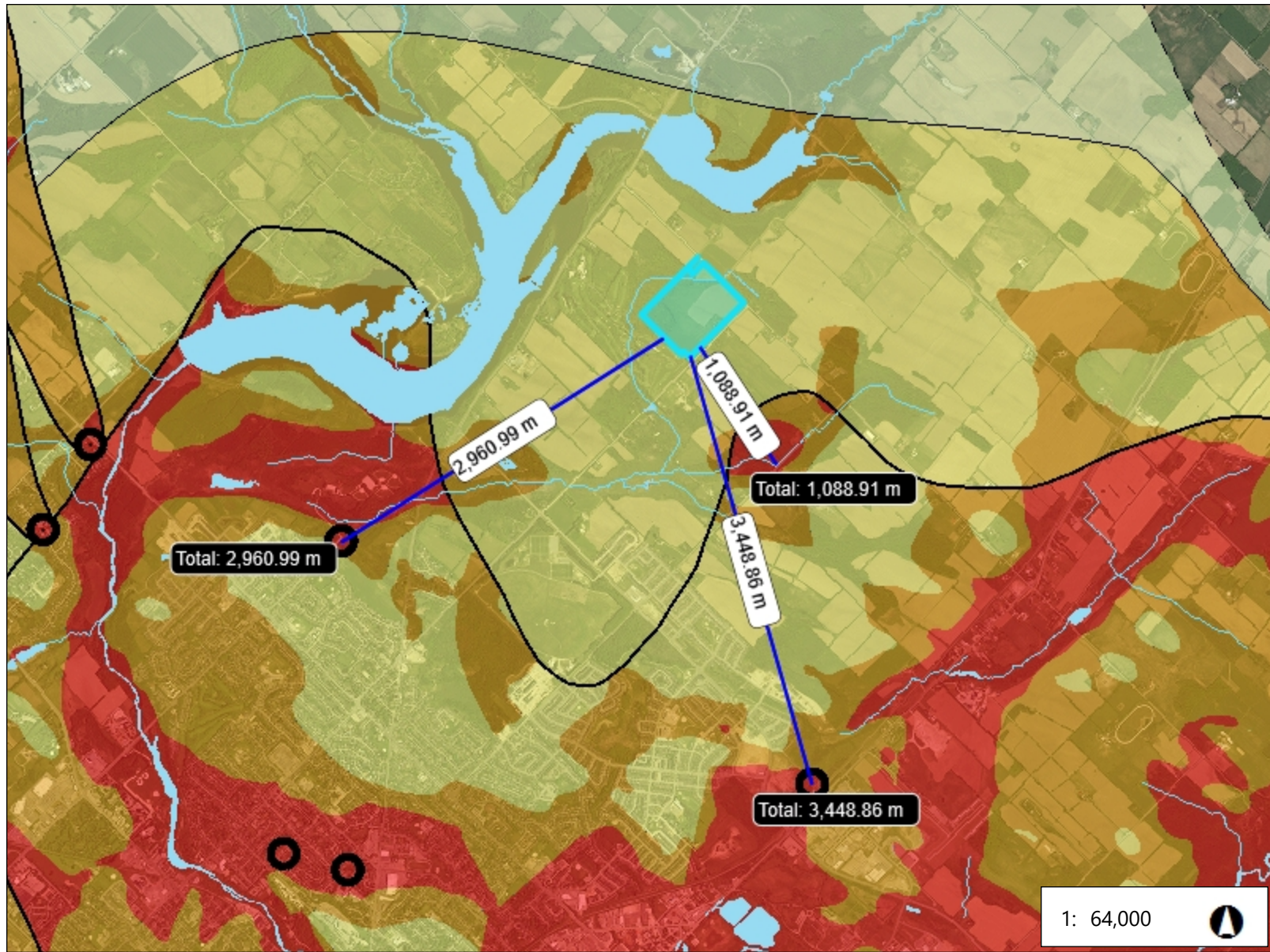
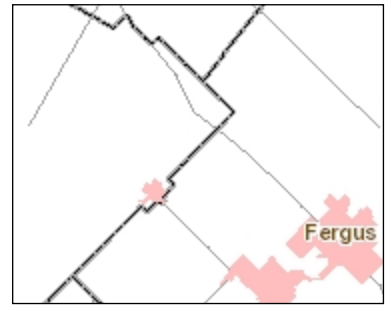
-  Parcels
- Roads**
  -  Local Road
  -  County Road
  -  Highway
-  Waterbodies
-  Watercourses
-  Well Locations
-  SGRA
- RoadsLookup

1: 8,000 



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  - A
  - B
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  - 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,
- RoadsLookup

1: 64,000



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