



09/15/2023

Memorandum

To: Kراسi Panayotova, Ontario Ministry of Environment, Conservation and Parks, 135 St. Clair Avenue West, 1st Floor, Toronto, ON

Submitted via E-mail

CC: Courtenay Hoytfox, Interim CAO / Municipal Clerk, Township of Puslinch

From: Kim Funk, Source Protection Coordinator, Wellington Source Water Protection

RE: Ministry Reference Number 6193-CSJPFC, Puslinch Park GP Inc, Environmental Compliance Approval – sewage (ERO-019-7435), Lot 26 & 27 Concession 7, Puslinch

The following comments are related to the above referenced Environmental Compliance Approval (ECA) application (Ministry reference number 6193-CSJPFC). This is an application to install an onsite wastewater system with a capacity greater than 10m³/day.

Based on our review of the submitted application and supporting documentation, Wellington Source Water Protection has no objection to the proposed application receiving approval subject to the following conditions, comments and /or clarifications.

1. Based on the application documentation, we understand that the stormwater management facility / ECA is not part of this application despite references to stormwater managing in the ERO posting and some of the MTE documentation. If this is incorrect, please clarify to the undersigned and copy the Township of Puslinch Municipal Clerk as we request that the stormwater ECA application be forwarded for review.
2. We have reviewed the applicant's Section 4.5 of the ECA application form and confirm that the information provided is correct. We note that MTE notes in the Hydrogeological Assessment that the site is within a draft WHPA-Q, we confirm this is also correct and that the WHPA-Q is still draft at the time of this memo. There is not a date yet for approval of the draft WHPA-Q. Due to the site's location outside any water quality WHPA or ICA, and because the draft WHPA-Q is not yet in legal effect, there are no Significant Drinking Water Threat policies that currently apply.

3. Although significant drinking water threat polices do not currently apply for this site, approved policy WC-MC-23.2 in the Wellington County Chapter of the Grand River Source Protection Plan will apply in the future to this site once the draft WHPA-Q is approved for stormwater management facilities / approvals. It is noted that this application is only for the wastewater ECA and it is unclear if the stormwater management ECA has been applied for yet. We request the MECP circulate the Township of Puslinch, through the Municipal Clerk, when the stormwater ECA is posted for public comment. At that time, it is recommended that the Ministry consider the policy text referenced below and add terms and conditions to the stormwater ECA, where appropriate.

For reference, please see the ECA policy wording WC-MC-23.2 below:

To ensure that any Recharge Reducing Activity never becomes a significant drinking water threat, where this activity would be a significant drinking water threat as prescribed by the CWA, the MECP should, during any pre-submission consultation for Environmental Compliance Approvals for Stormwater Management Facilities and / or Sewage Works, encourage design and implementation measures for the maintenance of groundwater recharge functions including but not limited to LID, minimizing impervious surfaces and lot level infiltration. The MECP shall issue Environmental Compliance Approvals for Stormwater Management Facilities and / or Sewage Works that, where appropriate, incorporate conditions that address groundwater recharge considerations. In addition, the MECP, where appropriate, shall consider incorporating conditions in the Environmental Compliance Approvals to address the proper functioning of groundwater recharge measures including, but not limited to, conditions requiring or related to operations, inspection and maintenance of the Stormwater Management Facilities and / or Sewage Works, groundwater or surface water monitoring related to groundwater recharge, and documentation including manuals and maintenance records. For Stormwater Management Facilities and / or Sewage Works located within the WHPA-Q in a Chloride, Sodium or Nitrate ICA, the MECP shall consider conditions that require best management practices that address how recharge will be maintained and water quality will be protected from application and storage of winter maintenance materials including Salt.

It is noted that the supporting documentation from MTE references stormwater design and infiltration cells and that this has been discussed with the MECP District Office.

4. It is recommended that the Ministry add appropriate terms and conditions to ensure that effluent quality will have no negative impact on water quality in private wells on adjacent properties. We note that effluent criteria has been discussed and is being reviewed by the Ministry.



Summary of Source Protection Vulnerable Areas and Drinking Water Threats

The subject property is located in:

- a) a Significant Groundwater Recharge Area (SGRA); and
- b) a draft Wellhead Protection Area Q (WHPA-Q) with a significant risk level.

Attachments show the relevant mapping. Please note the subject property is not located in an Issue Contributing Area (ICA), a Highly Vulnerable Aquifer (HVA), or a Wellhead Protection Area for Quality.

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.

We respectfully request a written response to our comments via e-mail to the undersigned.

Sincerely,

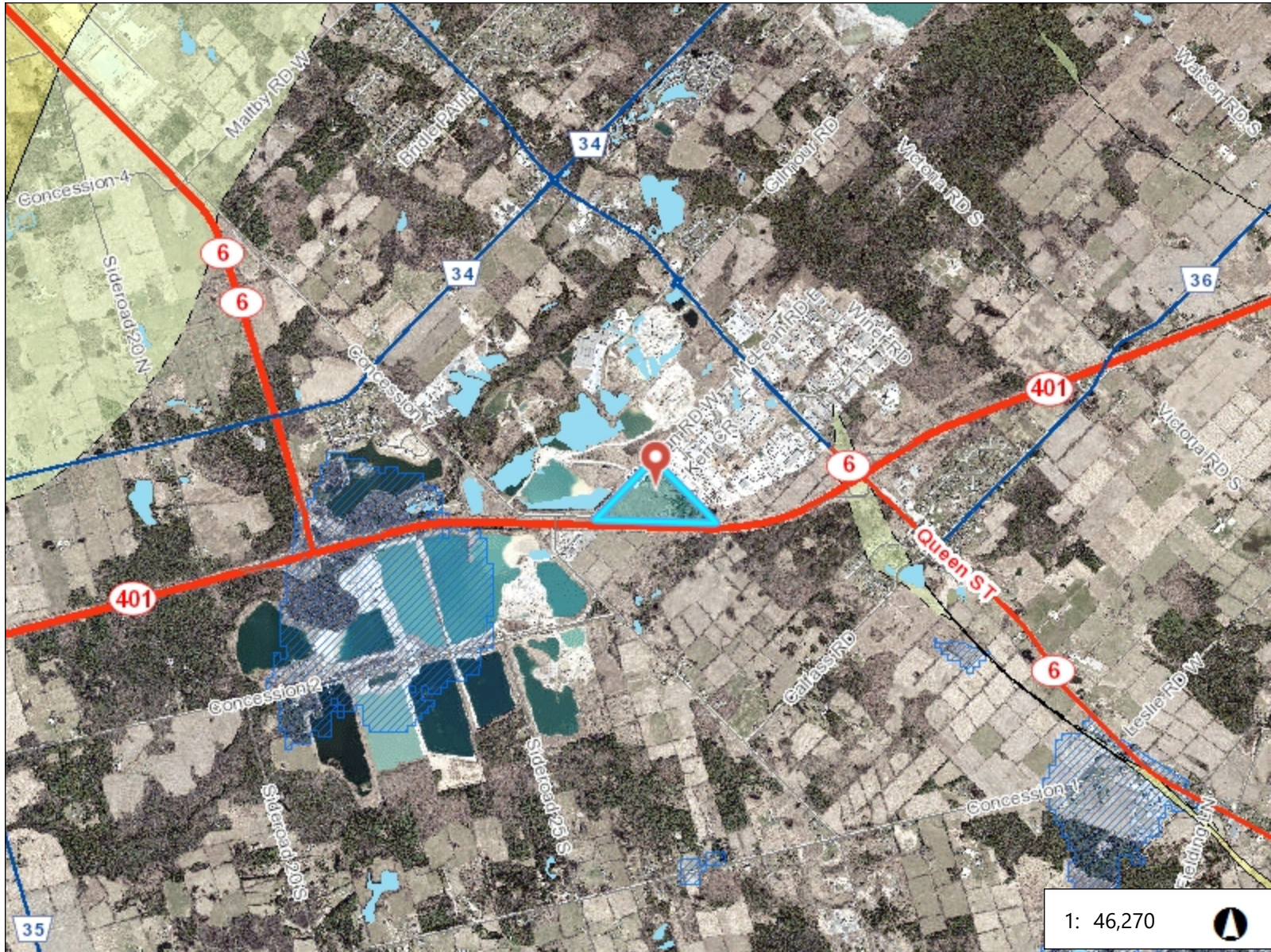
September, 15, 2023

Kim Funk, Source Protection Coordinator

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kfunk@centrewellington.ca

Attachments – WHPA Maps



Legend

- Roads - Small Scale
 - Local Road
 - County Road
 - Highway
- Waterbodies
- Well Locations
 - Existing
 - Proposed
- Wellhead Protection Area
 - 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: 46,270

2.4 0 1.18 2.4 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.

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Notes

