



2023/09/15

## 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*

CC: Glenn Schwendinger, CAO, Township of Puslinch  
Courtenay Hoytfox, Deputy Clerk, Township of Puslinch

From: Danielle Walker, Source Protection Coordinator, Wellington Source Water Protection

RE: **Ministry Reference Number 3182-CTTEGX8, 7475 McLean Road East LP, Environmental Compliance Approval (industrial sewage) (ERO 019-7430) – 7475 McLean Road East, Puslinch**

## General

1. The following comments are related to the above referenced Environmental Compliance Approval (ECA) application (Ministry reference number 3182-CTTEGX8). This is an application for a new ECA for the approval of stormwater management works. The proposal includes underground storage chambers, storm sewers, and two oil-grit separators. The works will discharge to existing ditches along the east and west of the property.
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. 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

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.

3. 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.
4. Once the Wellhead Protection Area for Quantity is approved, there will be legally binding policies that will apply pertaining to groundwater recharge. Policy WC-MC-23.2 in the Wellington County Chapter of the Grand River Source Protection plan applies to stormwater management facilities in the WHPA-Q. Although not yet approved, we recommend that the Ministry consider the policy text referenced below and terms and conditions to the ECA, where appropriate.

For reference, please see the 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 recommended that the Ministry consider this policy and add appropriate terms and conditions to the subject property ECA to address potential impacts to the WHPA-Q and significant groundwater recharge areas.

It should be noted that during a site plan application process with the Township of Puslinch, the applicant submitted documentation to sufficiently address the site's winter maintenance activities, as well as providing a water balance assessment report that addressed pre and post development recharge. It is recommended that the Ministry consider reviewing the submitted documents to ensure the best management practices and LID measures proposed are sufficient, if necessary.

It is requested that the Ministry consider the above recommendations while reviewing this ECA application and add terms and conditions, as appropriate.

Sincerely,

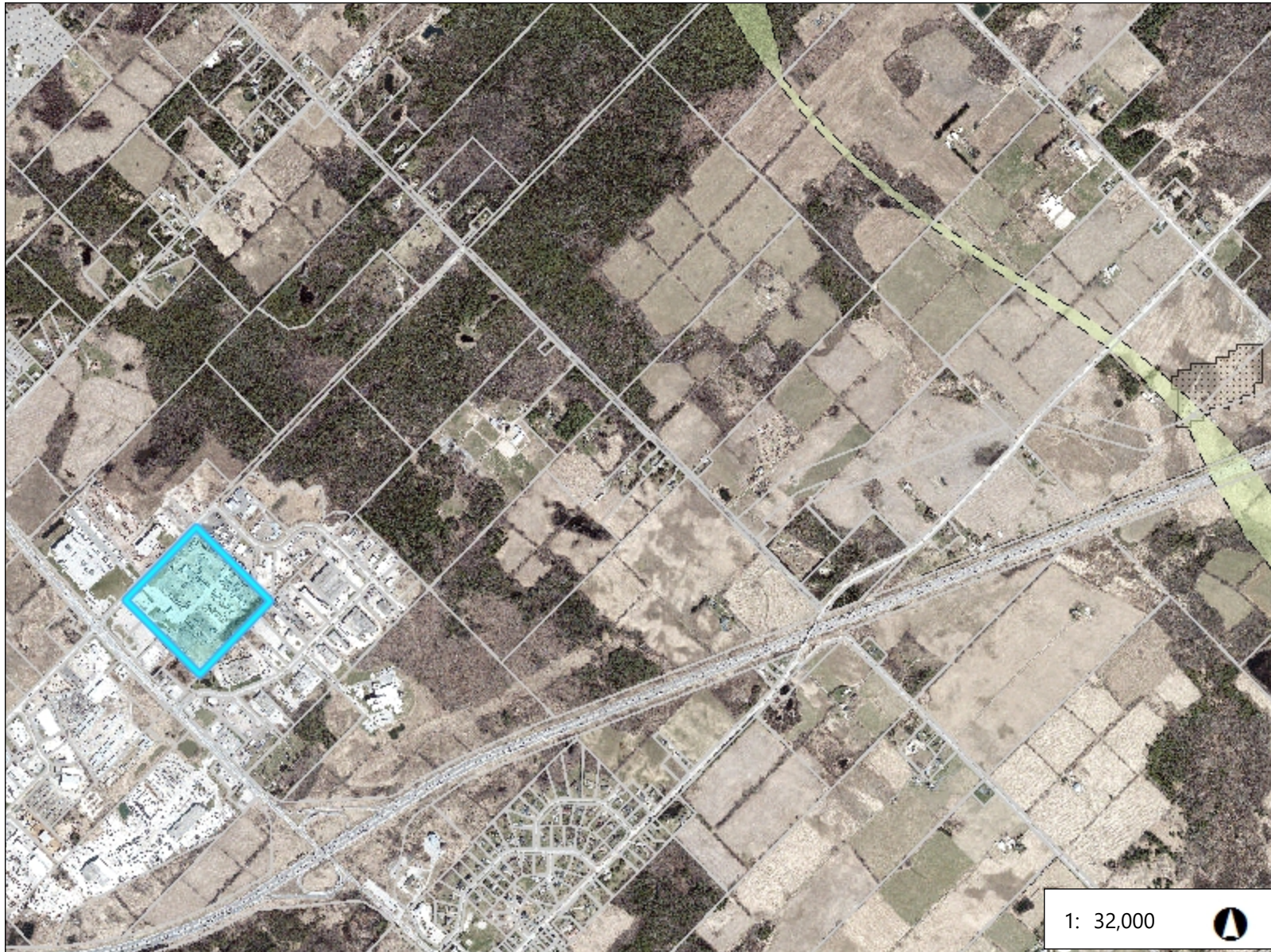
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Danielle Walker, Source Protection Coordinator

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Attachments – WHPA Maps



Legend

- Parcels
- Well Locations
- Wellhead Protection Area Boundaries
  - A
  - B
  - C
  - D
- Issue Contributing Area
  - Chloride
  - Nitrate
  - Sodium
  - TCE
- 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: 32,000

1.6 0 0.81 1.6 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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THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2022

Notes

