



May 15, 2020

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

From: Emily Vandermeulen, Risk Management Inspector, Town of Erin and Township of
Guelph/Eramosa

Reviewed By: Kyle Davis, Risk Management Official, Town of Erin and Township of
Guelph/Eramosa

**RE: Environmental Registry Number 019-1574, Robert Noble Septic. Environmental
Compliance Approval (waste) – 5243 Third Line, Erin**

General

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 March 31, 2020 (ERO reference number 019-1574 and Ministry reference number 20-GUE-63851). The public commenting period ends on May 15, 2020.

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.

It is understood that Robert Noble Septic, a waste hauling company, has applied for a new Environmental Compliance Approval (waste) for its location at 5243 Third Line in the Town of Erin. The purpose of the instrument is to allow for the application of hauled sewage to land.



Water Quality Wellhead Protection Areas

2. The subject property is located within a Wellhead Protection Area D (WHPA-D), 25 year time-of-travel, with a vulnerability score 4 for the Rockwood water system. The applicable source protection plan is the Grand River Source Protection Plan. The property has been identified as not being in a Highly Vulnerable Aquifer (HVA). The attached map (WHPA_Map_5243ThirdLine) shows the applicable vulnerable areas, as defined by the *Clean Water Act*, 2006, applicable to the subject property.
3. It should be noted, however, that the subject property will **not** be located in the new, draft Rockwood WHPAs that have been modelled and are to be submitted to the Ministry of the Environment, Conservation and Parks in 2020. See attached map (WHPA_Map_5243ThirdLine_Draft).

Water Quantity Wellhead Protection Areas

4. The property is partially located within a significant groundwater recharge area (SGRA), corresponding to approximately the northeast 25% of the property. An SGRA is an area where greater than normal recharge of water down to the aquifer is occurring. Please see attached map (WHPA_Map_5243ThirdLine_Q). It is 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 ensure protection of this vulnerable area.
5. The Ministry should note that the subject property is within an Intake Protection Zone Q (IPZ-Q) that was presented to the Lake Erie Source Protection Committee as part of a Tier 3 water budget study. Please see attached map (WHPA_Map_5243ThirdLine_Q_Draft). The results of that study and the full report are publicly available at <https://www.sourcewater.ca/en/index.aspx>. It is noted, however, that the study has not yet been incorporated into the Grand River Source Protection Plan or Assessment Report and therefore the WHPA-Q is not currently in legal effect or in the County in Wellington Official Plan schedules. Further information can also be found at <http://www.wellingtonwater.ca/en/how-does-this-affect-me/tier-3-water-budget-studies.aspx>.



6. A project is currently ongoing by Grand River Conservation Authority, County of Wellington, the Township of Centre Wellington and other municipalities to complete the steps necessary to update the Grand River Source Protection Plan and Assessment Report with these policies. The draft policies are scheduled for public consultation in 2020 and Ministry Source Protection Branch staff are involved in the review of the policies.

If you require further information, please contact:

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Attachment 1 – WHPA_Map_5243ThirdLine
Attachment 1 – WHPA_Map_5243ThirdLine_Draft
Attachment 1 – WHPA_Map_5243ThirdLine_Q
Attachment 1 – WHPA_Map_5243ThirdLine_Q_Draft