Re: ERO #019-3689, Ministry Reference #9451-BYCS9G - Dwayne Wilson, operating as The Stool Bus

We feel compelled to file a complaint against the proposal of Mr. Dwayne Wilson of Glencoe, ON, operating as The Stool Bus, for the use of the property at 6953 Falconbridge Road in Melbourne as a hauled sewage disposal site. Much earth moving, digging, and excavating has already been done in the summer of 2020 (including digging of a large pond), which makes it seem that when this proposal was posted in May this year, 2021, the approval for this project had already gone through.

We are very concerned about the contamination implications that the dumping of raw untreated sewage will have on us and on our neighbouring environment and waterways. Here are our concerns more specifically:

- The Ministry of the Environment has stated that Ontario septage is high in pollutional characteristics. The only logical solution is either using a municipal treatment plant, or waste stabilization pond. Since septic is a mixture of treated and untreated waste, it presents a hazard due to pollutants.

- We know that untreated raw sewage contains pathogenic bacteria and viruses. This may be even a bigger concern in the current age of the Covid pandemic, which should have opened our eyes to the concerns of transferral of pathogens.

- We know that untreated raw sewage contains heavy metals which will accumulate.

- We would be concerned that the depth of the drainage system may be too close to the soil surface and the depth of the water table may be too shallow.

- We know that the connected properties directly on the right and left sides of proposed property are used for cattle grazing, which would not meet the guidelines of waiting periods for grazing, relating to public health and pathogens. (We or anyone else certainly would not want to eat beef grazing on or near the fence line. Canadians are supposed to be proud and confident in their food system.)

- The proposed disposal site is not zoned for disposal of raw septic waste. At no time should vast amounts of raw untreated sewage be spread on a parcel of land. It should be disposed of at a sewage treatment facility with proper procedures, equipment, testing and oversight. To dump waste on your own property with no arm’s length third party continued oversight would seem to be a conflict of interest.

- The proposed property is located in a floodplain (!), and is registered with the St. Clair Region Conservation Authority. In its Ontario Regulation 171/06 made under the Conservation Authorities Act it states that:

“2. (1) No person shall undertake development, or permit another person to undertake development in or on the areas within the jurisdiction of the Authority that are, (b) river or stream valleys that have depressional features associated with a river or steam”.

- In the 10+ years that we have lived in this neighbourhood the creek has flooded on at least two occasions, covering significant areas of Mr. Wilson’s property and adjacent properties, including crop land.

- In keeping with the highlights of the proposed approval requirements, Mr. Wilson is already unable to comply with several issues on his proposed hauled sewage disposal site:

*“Spills of a pollutant that cause or may cause an adverse effect are to be reported”.*

Waste material from portable toilets and septic systems holding tanks that Mr. Wilson intends to dump surely falls in this category. It will contain chemicals, needles, feminine hygiene products, wipes, condoms, and garbage that people flush down their toilets.

*“The company must ensure that no unnecessary off-site effects, such as vermin, vectors, odour, dust, litter, noise or traffic, result from the operation of this site”.*

It is highly improbable that this list can be adhered to as there unquestionably will be vermin, vectors, odour, dust and litter year round. Especially a bad odour, which will spread through the whole neighbourhood. This proposal’s intention is not to spread twice a year, but continuously, causing an incessant bad odour issue. The subjective bases on how the issue of odour will be addressed will certainly be a bone of contention. As an example, the Official Plan 2014-2034 of the Municipality of Strathroy-Caradoc states that proposals for residential, institutional or other sensitive land uses shall be discouraged within the odour impact zone of 100 meters around the Strathroy sewage treatment plant and the Mount Brydges landfill site, plus it alerts of an extra odour sensitive area of 400 meters. This spreading of septage will certainly be much worse for odour and debris.

*“No hauled sewage shall be spread or disposed of at the site under conditions where hauled sewage may run-off or discharge from the site”.*

There are 2 creeks running through the proposed property and through adjacent properties, the Augerman Drain and the Pierce Drain. These creeks spill out into the Government Drain No. 1 Extension. Waste will run-off into it and contaminate the water, not only on Mr. Wilson’s own site but on all the properties adjacent to and downstream from it, especially after heavy rains. We, as people living in rural communities, rely on our drinking water from dug water wells, which will undoubtedly be negatively affected. Our ponds, downstream wetlands and waterways, reservoirs and marshes will all be polluted. These are also the waters that grazing cows in nearby fields drink from. And wildlife (such as fish, turtles, deer, and birds) will suffer.

- Dumping of raw sewage negates all efforts that Strathroy-Caradoc implemented to reduce pollution of our fresh water systems and aquifers. As an example, all the areas for the recent new housing developments in nearby Mt. Brydges were only granted permission after a full municipal water supply and sanitary treatment service was put in place (maybe even at the directive of the Ministry of Environment). Part of the reason was that pollutants were found in the water quite far from the town, but were believed to have come from the town itself. We have come to the point where we as a Strathroy-Caradoc community are trying to reduce the negative impact of sewage affecting our water supply, just to see a proposal to put raw untreated sewage directly in our waterways. This is comparable to a scenario of going to an oil change/lube shop, having them drain the oil pan carefully into a container and transferring it to a holding tank for proper environmentally sound disposal recycling or treatment, so not to pollute. Then a disposal tanker truck picks up said product and instead just dumps it on land someplace else.

We trust that this letter will encourage you to reject Mr. Wilson’s proposal to deposit raw untreated waste (not just sewage without oversight/scrutiny) on the property at 6953 Falconbridge Drive in Melbourne. This proposal has no positive outcomes for the environment whatsoever, only a string of negative consequences, some short-lived, but most long-lasting.

The amount of time spent formulating this letter speaks volumes of how gravely concerned we are about this irresponsible proposal of spreading untreated human waste.

We appreciate your consideration.

Note: At this time we also need to voice our disagreement over the way proposals such as this one are being dealt with. Concerned neighbours should be notified of these types of developments that can have a big impact on the community. Notifications should be sent out to all surrounding neighbours in a timely manner to allow for plenty of time to respond, plus a notification needs to be posted on the proposed site.