



07/24/2024

## 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: Courtenay Hoytfox, Interim CAO, Township of Puslinch  
Justine Brotherston, Interim Municipal Clerk, Township of Puslinch

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

RE: **Ministry Reference Number 2224-D2WSFA, Environmental Compliance Approval  
(sewage) (ERO #019-8792) - 100 Beiber Road, Puslinch**

## General

1. The following comments are related to the above referenced Environmental Compliance Approval (ECA) application (Ministry reference number 2224-D2WSFA). This is an application for an amendment to an ECA for industrial sewage treatment and stormwater management works. The proposal includes an expansion of the existing sewage treatment works, the separation of sanitary and process wastewater, and the installation of a new packaged Membrane Bioreactor for treating process wastewater.
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 Wellhead Protection Area D (WHPA-D) with a vulnerability score of 2
- b) a Significant Groundwater Recharge Area (SGRA); and
- c) 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), or a Highly Vulnerable Aquifer (HVA).

- 3. Due to the site's location within a WHPA-D, 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-23.1 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 add terms and conditions to the ECA, where appropriate.

For reference, please see the policy wording WC-MC-23.1 below:

*To ensure that any Recharge Reducing Activity ceases to be a significant drinking water threat, where this activity is a significant drinking water threat as prescribed by the CWA, the MECP shall review and amend, if necessary, Environmental Compliance Approvals for Stormwater Management Facilities and / or Sewage Works to incorporate conditions, where appropriate, to address groundwater recharge considerations. Where appropriate and feasible, the MECP shall encourage the implementation of measures for the maintenance of groundwater recharge functions including LID, minimizing impervious surfaces and lot level infiltration. Where appropriate and feasible, the MECP shall consider establishing approval conditions in the Environmental Compliance Approval to ensure 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 a WHPA-Q in a Chloride, Sodium or Nitrate ICA, the MECP shall consider conditions that address how recharge will be maintained and water quality will be protected from application and storage of winter maintenance materials including Salt.*

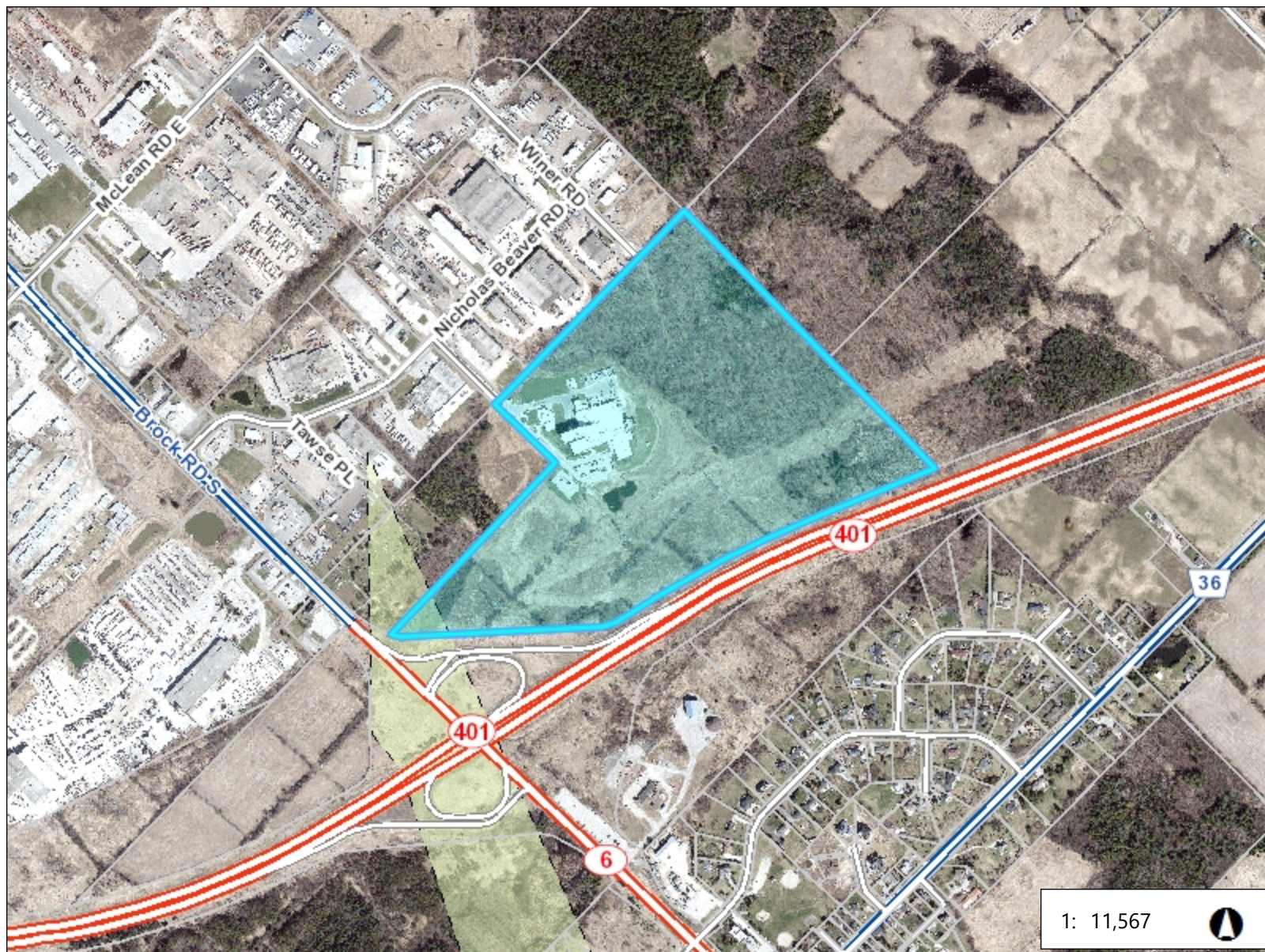
5. The Wood Environment & Infrastructure Solutions - Water Resource Impact Assessment Report, dated February 16, 2021, indicates that the stormwater management pond and sewage leaching bed may have localized impacts on groundwater quality. Section 8.4.1 describes increased nitrate, chloride and sodium concentrations in BH3 that align with the use of the leaching bed, while Section 8.4.2 describes spatial differences in water quality across wells on the property, with high sodium and chloride concentrations seen in wells in the vicinity of both the stormwater management pond and leaching bed. Although stormwater and sewage at this property are not significant drinking water threats for municipal wells, it is recommended that measures be included to reduce the potential impact of chloride, sodium and nitrate on groundwater quality for private well users in the vicinity of this site.

It is recommended that the Ministry consider the above comments and add appropriate terms and conditions to the subject property ECA to address potential impacts to the WHPA-Q and significant groundwater recharge areas.

Sincerely,

Kim Funk, Source Protection Coordinator  
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Attachments – WHPA Maps

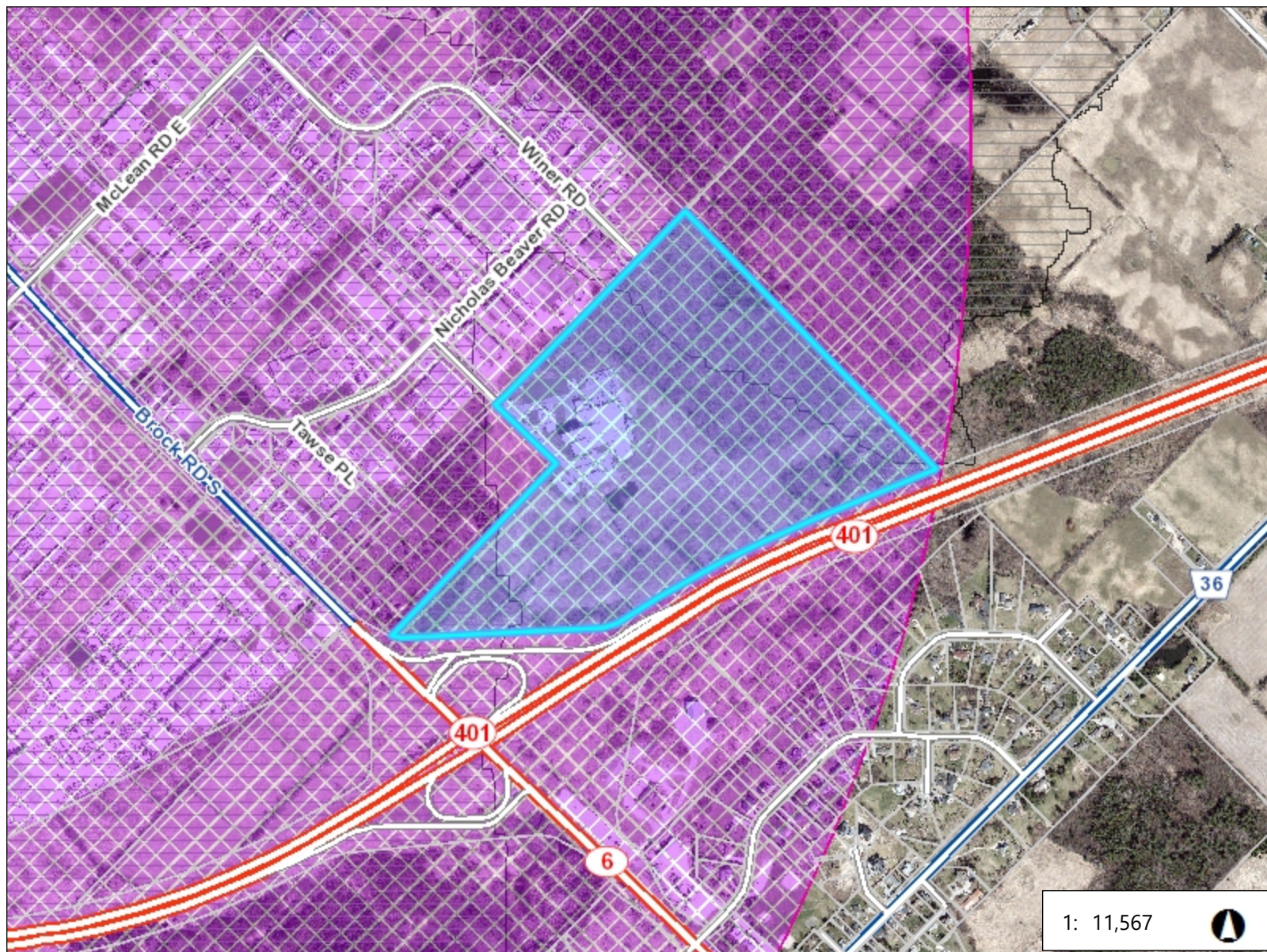


### Legend

- Parcels
- Roads
  - Local Road
  - County Road
  - Highway
- Well Locations
  - Existing
  - Proposed
- Issue Contributing Area
  - Chloride
  - Nitrate
  - Sodium
  - TCE
- Wellhead Protection Area
  - A
  - B
  - C
  - D
- Vulnerability Score
  - 10
  - 8, D; 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

0.6 0 0.29 0.6 Kilometers

### Notes



### Legend

- Parcels
- Roads**
  - Local Road
  - County Road
  - Highway
- Well Locations**
  - Existing
  - Proposed
- WHPA Q1\_Q2\_Boundary
- WHPA Q1\_Q2**
  - Approved
  - Draft
- SGRA
- RoadsLookup

### Notes

0.6 0 0.29 0.6 Kilometers