

## **Comment on OLT 22-003082 Decision – for the ECA,**

I believe that the proposed Storage Facility on 25700 Kerwood Road has some major deficiencies.

### **Stormwater Management**

Why is a storage facility of this size or magnitude situated so close to the Sydenham River that is home to many endangered species and certain species that are not found elsewhere in Ontario or Canada? The chance that the contaminated water from the Contact Pond could end up in the Sydenham River due to planned irrigation of said water and the fact that the farmland is tiled and connected to Municipal Drain that flows into the Sydenham, is very high.

How can MECP ensure that there is proper collection and separation of Contact Water versus Non-Contact Water? It is my understanding that the Non-Contact Pond is free-flowing – so if any Contact Water is in the Non-Contact Pond, it will be contaminated and eventually end up in the Sydenham River.

With tarps and tires being used as a cover, that will mean that during unloading times and possibly at loading times the Pellets will be exposed to nature (tarps will not/can not be covering all areas of the Pellets when unloading and loading). There will be occasions when it will be raining during the loading and unloading process. How will the stormwater management system work properly in these conditions? The Non-Contact Water will be contaminated in these situations.

Irrigation of the land from the Contact Pond - how does MECP know that it won't infiltrate to the field tiles and from there reach the Municipal drain? What proof was provided to show that the Contact Pond water would not flow to the tiles? If irrigation is scheduled after a rain or recent moisture occurrence on the land, then for sure some of the Contact Water would infiltrate to the tiles.

How does MECP regulate the irrigation schedule and amounts so there is reduced chance of infiltration to the tiles of the contaminated water. The farmland where the Storage Facility is proposed was tiled in the last two or three years. Without the tiling then there would be a reduced concern of contaminated water ending up in the Municipal Drain and then eventually in the Sydenham River. Why did the Appellants tile the said land after the Site Plan was originally filed with the Township?

In Paragraph 47 of the Tribunal Decision - Hutchinson responded that it would be very unlikely that the NASM water (Contact Water) used on the crops could be absorbed through the soil to the field tiles and from there reach the Municipal Drain. How did he prove that to the MECP?

In Paragraph 31 of the Tribunal Decision, states that 40 to 60% of the water in the Contact Pond would be clean water. If water is contaminated or unclear the entire pond would be contaminated not just 40 to 60%. This statement holds no semblance of fact.

### **Conclusion:**

To ensure the protection of the community and the Sydenham River in regard to the Stormwater Management then the Storage Facility should be fully enclosed including the loading and unloading areas. This would ensure that during a rain or weather storm the water from such an event be a Non-Contact situation.

By having a fully enclosed Storage Facility this would also allow protection from spontaneous combustion, humidity control and odour control.

### Dust Impacts

With having an open or uncovered loading and unloading area there will be a substantial amount of dust created. This dust will find its way to the Contact Pond and Non-Contact Pond as well as the farmland surrounding the said Storage Facility. This dust will contaminate the Non-Contact water and thus create a potential hazard to the water flowing into the Sydenham River. The dust will not be confined just to the said area but with winds that are of any strength the surrounding radius of up to three (3) kilometres or more will have the dust particles settle. This will include the Sydenham River and residences where families are living year-round. The fact that this facility will have trucks and trailers loading and unloading throughout the year always creates a potential dust hazard. This then becomes a major health concern.

If any one has viewed the CTV News report (Scott Miller) of the Nov 1, 2023 regarding the pile of biosolids fertilizer in Bruce County near Sarah and Claude Wiggermann's property (near Ripley Ont) you would see the dust created by the unloading of said product. This product was piled there by Lasalle Agri the company that is behind the proposed storage facility.

With the tarping system suggested for this facility it will also create a dust impact – that may not be quantified – but it will surely be present. These tarps will accumulate dust from the product and when moved will cause the dust to be airborne. Where it settles is anyone guess? Can we risk the potential consequences to Sydenham River of this dust reaching it?

The tarping system is and will be dealt with by the employees at the facility. Can we rely on “zero human error” when making sure that tarps cover all the Pellets when there are no trucks loading and unloading?

To ensure the protection of the community and the Sydenham River in regard to the Dust Impacts then the Storage Facility should be fully enclosed including the loading and unloading areas. This would ensure that dust would be contained inside and as a result the strength of the wind on any days of loading or unloading would not be a factor.

### Odour Impacts

The pellets in question are dry and supposedly non-odorous at that time. With the open area for loading and unloading and a tarping system in place there will be times that the Pellets will be in contact with moisture from rain or change in humidity. This will activate the odour impact. The size of the two storage bunkers proposed will increase the odour impact dramatically. There are neighbors that have been in close proximity to or just driving by this product when stored or being applied that became violently sick from the odour. This odour is far stronger and lasts longer than any animal manure spread by farmers. If you go to the corner of Highway 402 and Navoo Road (Highway 89) the location where Lasalle Agri stored a large pile of Pellets in 2019 – it still has a residual odour. Do we need this health concern in this community?

Since this operation is year-round, they will be loading and unloading process will be ongoing – so undoubtedly there will be times when the trucks are loading and unloading while it is raining. So, the odour impact will be a constant concern.

To ensure the protection of the community and the Sydenham River in regard to the Odour Impacts then the Storage Facility should be fully enclosed including the loading and unloading areas. This would ensure that odour would be mitigated due to minimal contact with moisture or rain and as a result the type of weather on the day of loading or unloading would not be a factor.

## Fire Hazard

In Paragraph 53 of the Tribunal Decision there is a comment that the Pellets combustibility is similar to that of wood chips. I have never heard or seen a pile of wood chips spontaneously combust. However, the fire departments in this Township and neighboring Townships have been called out to deal with fires from Pellets stored on the ground. The fact that this facility will have a concrete floor, and two (2) foot high wall does not decrease the combustion factor since the product is in an uncovered status at times of storage, and during the loading and unloading process.

The Township has a volunteer fire department and if the storage facility has any or numerous call outs then this could result in an emergency call out when life is at risk being delayed due the attendance at this site. Do we want to take that risk?

To ensure the protection of the community and the Sydenham River in regard to the Fire Hazard then the Storage Facility should be fully enclosed including the loading and unloading areas. This would ensure that fire hazard would be mitigated due to minimal contact with moisture or rain and potential humidity control and thus spontaneous combustibility would not be a factor.

By having a fully enclosed Storage Facility this would also allow protection from storm water management concerns, spontaneous combustion, humidity control and odour control.

## **Final Conclusion:**

If this Storage Facility has to be approved make sure that it is built so that it reduces the concern of Contact Water possibly being contaminated, and contaminated Non-Contact Water flowing into the Sydenham River thus protecting all species in the river and protecting any water users in the area and downstream. The Storage Facility has to be built to reduce the odour and dust impacts and that only leads to an enclosed facility – there by dealing with the health concerns of the surrounding community in regard to dust and odour.