

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

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

Contact Water

In the proposed Storage Facility, there are comments that the Contact Water will be irrigated on the Subject Lands. There will be times the Contact Water is used to irrigate the Subject Lands just prior to or just after there is rain on the said land. When this occurs, there is a significant chance that the water will infiltrate to the field tiles below and then to the Municipal Drain and then to the Sydenham River.

The Tribunal also heard that there is a gate valve on the SWM system serving the non-contact runoff that can be shut in an emergency. How does this help the Contact Water? It is my understanding that a gate valve is in regard to the closing of the field tiles to the Municipal Drain. If there is need to use the gate valve, then the non-contact water will be contaminated to some extent. This contaminated water will reach the Sydenham River, due to the free flowing of this pond.

“The frequency of land applications varies from site to site. Several factors are considered when determining a suitable site for land application. Some of the factors include proximity to residential areas, slope of the land, soil chemistry, drainage, crops to be grown, and nearby watercourses. Ontario Regulation 267/03 (Nutrient Management Act) restricts the volume of biosolids that can be applied to a field to protect both surface water and ground water in Ontario.”

How can we ensure the irrigation process from the Contact Water will be suitable to protect both surface water and ground water in the area? How do we ensure - since there is a tile drainage system on the said land that the irrigation process will not cause the Sydenham River to be contaminated?

Dust Impacts

In paragraph [76], the expert indicated that there would be no dust conditions, or the product would not create any dust conditions. 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 Ripley Ontario you would see the dust that is created by the unloading of said product. How can the Tribunal or MECP support the comment of the expert that there will be no dust conditions?

The dust impact can and will have a major impact on the employees and any living species in the surrounding community.

Size

The of the Storage Facility is unheard of or unseen of pursuant to the experts. Why would the MECP allow a facility of this size to proceed? As well why would the MECP allow such a storage facility be situated so close the Sydenham River and on land that is a major ground water recharge area?

Odour Impacts

The Pellets in question are dry and supposedly non-odorous at that time. However, sewage biosolids are categorized as Odour Category 3 (OC3) pursuant to NASAM. 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. This odour is far stronger and lasts longer than any animal manure spread by farmers. Do we need this health concern in this community?

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

Loading and Unloading area

The fact that the proposed Storage Facility will have open (non-covered) loading and unloading areas will create a health concern. The product will be exposed to the rain, thus potential contamination of the non-contact pond and there will be dust concerns on windy days and moisture and odour concerns on rainy days.

How can the health concerns of the community and the potential consequences to the Sydenham River not be a factor to halt this Storage Site until more evidence is gathered regarding the safety of the said site.

Tiling

Why was this said land allowed to be tiled after the original Site Plan was filed? By tiling the field this ensures that some of the contaminated water (Contact Water) will reach the field tiles, the Municipal Drain and finally the Sydenham River. Do we really want to approve a Storage Facility that will endanger the Sydenham River and its species?

Climate Change and Extreme Weather Events

In the past four years we have had extreme weather events. We had a rainfall event (5 plus inches) in less than three hours in August 2023 and winds that were in excess of 100km per hour in this area from the tornado in Petrolia July 2023. How can this Storage Facility as proposed with bunker walls of only two (2) feet high and tarps and tires covering the product that could be seven (7) metres high ensure the protection of the surrounding environment and the watershed in extreme weather conditions?

Final Conclusion:

If this Storage Facility has to be approved make sure that it is built so that it reduces the concern of Non-Contact Water possibly being contaminated. This only leads to a fully enclosed facility.

The approved facility and the disposal of the contaminated Contact Water has to be such that no amount of contaminated water flows into the field tiles and to the Municipal Drain and ultimately to the Sydenham River.

We need to protect all species in the Sydenham River and protect 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 a fully enclosed facility – thereby dealing with the health concerns of the employees and the surrounding community in regard to dust and odour concerns as well dealing with the stormwater concerns.