



October 3, 2025

Ministry of the Environment, Conservation and Parks
Client Services and Permissions Branch
135 St Clair Ave West, 1st Floor
Toronto, Ontario
M4V 1P5

Public Works

10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

Re: 2852804 Ontario Ltd. (ERO 025-0958)

Dear Client Services and Permissions Branch:

Peel Region appreciates the opportunity to comment on the proposed Environmental Compliance Approval (ECA) (sewage) for 2852804 Ontario Ltd. Peel Region staff feedback and questions are included below for the Ministry's consideration.

PEEL REGION STAFF COMMENTS

Design Guidelines for Sewage Works Chapter 22 suggests that site evaluation for large subsurface sewage disposal systems include digging test pits or drilling boreholes at the proposed drainfield location to reveal soil and groundwater conditions. Has a soil study been conducted to properly inform drainfield design?

Stormwater run-off from the service centre is likely to contain trace contaminants such as gasoline, diesel fuel, oil, and glycol. The proposed sewage works should be designed with these substances in mind. With direct discharge into Etobicoke Creek Watershed (and without supporting materials being available online), Peel Region staff strongly recommend that the ECA for this service centre include a monitoring program with regular inspections to ensure no impact to the environment. Efforts should be made to minimize nutrient and contaminant loadings into the receiving watershed, including measures to prevent bypassing of the treatment system during wet weather events that exceed its design capacity.

The municipal water infrastructure in the area is potentially at increased risk of contamination in the event of a watermain break if the proposed sewage system is not kept in a state of good repair. A similar contamination risk is posed to groundwater that may impact private residential wells north of the service centre site. Consideration must also be given to the proximity of farmlands, where crops and livestock could be affected by contaminants from the subsurface disposal bed, creating potential food chain impacts.



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The ECA must clearly outline the requirement for contingency and emergency response planning, including spill response, reporting protocols, and an emergency contact list that identifies interested parties and municipal partners.

CONCLUSION

Peel Region staff support issuance of the proposed ECA (sewage) subject to the Ministry's incorporation of the above comments to strengthen safeguards and ensure the protection of the environment.

If you have any questions or require more information, please contact me at elvis.oliveira@peelregion.ca.

Regards,

Signed by:

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Elvis Oliveira

Director, Infrastructure Planning, Partnerships & Compliance
Water & Wastewater Divisions
Peel Region, Public Works