



Client Services and
Permissions Branch
Client Services and
Permissions Branch
135 St Clair Ave West
1st Floor, Toronto, ON
M4V 1P5
Canada
VIA: ERO 025-0990

Township of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J0
www.puslinch.ca

October 23, 2025

RE: 10.3 ERO Posting 025-0990 regarding Sewage ECA for 2795848 Ontario Inc. - 128 Brock Road

Please be advised that Township of Puslinch Council, at its meeting held on October 8, 2025 considered the aforementioned topic and subsequent to discussion, the following was resolved:

Resolution No. 2025-325:

Moved by Councillor Sepulis and
Seconded by Councillor Hurst

That Correspondence Item 10.3 ERO Posting 025-0990 regarding Sewage ECA for 2795848 Ontario Inc. - 128 Brock Road be received for information; and

That Council direct staff to submit the comments from Wellington County Source Water Protection to the ERO posting for the Ministry's consideration.

CARRIED

As per the above resolution, please accept a copy of this correspondence for your information and consideration.

Sincerely,

Justine Brotherston
Director of Corporate Services/Municipal Clerk



09/25/2025

Memorandum

To: Justine Brotherston, Director of Corporate Services / Municipal Clerk, Township of Puslinch

From: Keira Martinson, Source Protection Coordinator, Wellington Source Water Protection

Reviewed by: Kyle Davis, Risk Management Official, Township of Puslinch

RE: **Ministry Reference Number 2426-DJ8KG2, Environmental Compliance Approval (Sewage), ERO #025-0990 - 2795848 Ontario Inc., 128 Brock Road South, Puslinch**

General

1. The following comments are related to the above referenced Environmental Compliance Approval (ECA) application (Ministry reference number 2426-DJ8KG2). This is an application for a new ECA for a new Class 4 onsite domestic sewage disposal works. This sewage disposal works has a daily maximum flow of 16,500 litres per day, and will service 2795848 Ontario Inc.'s proposed warehouse development at 128 Brock Road South. The proposal includes flow equalization, moving bed biofilm reactor treatment, and pumping of effluent to a Type A bed for subsurface discharge.
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 Significant Groundwater Recharge Area (SGRA); and
- b) a draft Wellhead Protection Area Q for Quantity (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), a Highly Vulnerable Aquifer (HVA), or a Wellhead Protection Area for Quality.

1. Due to the site's location outside any water quality WHPA or ICA, and because the draft WHPA-Q is not yet in legal effect, there are no Significant Drinking Water Threat policies that currently apply. The draft WHPA-Q is part of a pre-consultation process that is ongoing in Fall 2025 and includes commenting opportunities for municipalities and Provincial Ministries.
2. Noted in the application and Design Brief submitted by FlowSpec, there are proposed designs for Stormwater Management, however this ERO posting is only scoped for onsite domestic sewage disposal works. Due to recent legislation changes, it is unclear whether a Stormwater ECA or Stormwater Environmental Activity and Sector Registry will be applicable to this site. Once the draft WHPA-Q is in legal effect, the recharge reducing activities will be a significant drinking water threat as a recharge reducing activity. WSWP recommends the applicants be made aware of the draft WHPA-Q and it is recommended that they reflect this in future submissions and reporting.

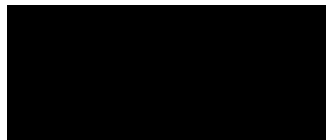
It is requested that the Ministry consider the above recommendations while reviewing this ECA application and add terms and conditions, as appropriate.

Sincerely,



Sept 25, 2025

Keira Martinson
Source Protection Coordinator
519-846-9691 ext 283
kmartinson@centrewellington.ca



Sep 25, 2025

Kyle Davis
Risk Management Official
519-846-9691 ext 362
kdavis@centrewellington.ca

Attachments – WHPA Maps



Explore
Wellington

128 Brock Rd South, Puslinch



Legend

- Parcels
- Roads
 - Local Road
 - County Road
 - Highway
- Urban Centres and Hamlets
- Well Locations
 - Existing
 - Proposed
- Issue Contributing Area
 - Chloride
 - Nitrate
 - Sodium
 - TCE
- Wellhead Protection Area
 - A
 - B
 - C
 - D
- Vulnerability Score
 - 10
 - 8, D; 8; 8, C
 - 2, 4, 6 (A, B or C); 2, B
 - 2, 4, 6, D; 2, 4, D; 2, 4, 6 (D); 4, D; 6,
- HVA
- Roads

0.3 0 0.15 0.3 Kilometers

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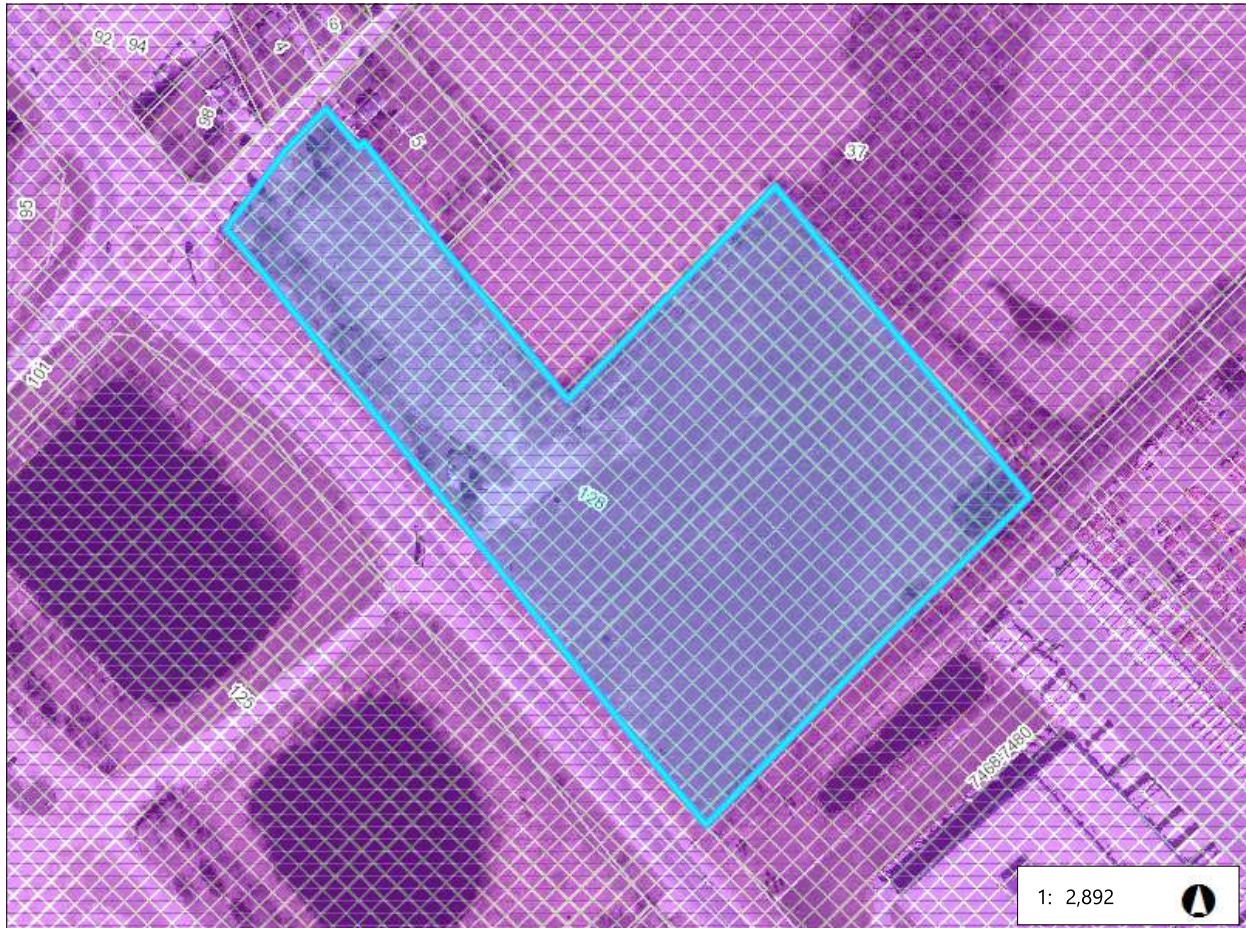
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Notes



A map of the Hamilton, Ontario area. The city's boundaries are outlined in black. The study area is highlighted in red, located in the central-eastern part of the city, near the Hamilton Harbour and the Niagara River. The map shows major roads and the surrounding urban landscape.



 Parcels
 Existing
 Proposed
 WHPA Q1_Q2_Boundary
 WHPA Q1_Q2
 Approved
 Draft
 SGRA
 RoadsLookup

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Notes

SWP_Comments_128_BrockS_SewageECA

Final Audit Report

2025-09-25

Created:	2025-09-25
By:	Keira Martinson (kmartinson@centrewellington.ca)
Status:	Signed
Transaction ID:	CBJCHBCAABAA0oQq1tqJSu2exWjRJRiToMKvFZHHWSv7

"SWP_Comments_128_BrockS_SewageECA" History

-  Document created by Keira Martinson (kmartinson@centrewellington.ca)
2025-09-25 - 8:11:42 PM GMT
-  Document emailed to Kyle Davis (kdavis@centrewellington.ca) for signature
2025-09-25 - 8:12:19 PM GMT
-  Email viewed by Kyle Davis (kdavis@centrewellington.ca)
2025-09-25 - 8:16:22 PM GMT
-  Document e-signed by Kyle Davis (kdavis@centrewellington.ca)
Signature Date: 2025-09-25 - 8:17:14 PM GMT - Time Source: server
-  Agreement completed.
2025-09-25 - 8:17:14 PM GMT