

Friday, November 7, 2025

**Submitted online and via email to [aaron.todd@ontario.ca](mailto:aaron.todd@ontario.ca)**

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Ministry of the Environment, Conservation and Parks  
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**RE: Proposed issuance of a Certificate of Property Use for the property located at 73 & 95 Curtis Drive in the City of Guelph.**

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback on the proposed issuance of a Certificate of Property Use (CPU) for the property located at 73 & 95 Curtis Drive, Guelph, Ontario.

A Risk Assessment was undertaken and approved by the Ministry of Environment Conservation and Parks (MECP) for the 73 & 95 Curtis Dr, Guelph, ON (Risk Assessment No. 5866-CFSRVW) property. The Risk Assessment established property specific standards for the contaminant of concern, trichloroethylene (TCE) and its degradation products including 1,1-dichloroethylene (1,1-DCE), 1,2-cis-dichloroethylene (1,2-cis-DCE), and vinyl chloride (VC). ERO No. 025-1059 is seeking comments from the public related to a draft Certificate of Property Use No 2484-DJ2J3K, associated with 73 & 95 Curtis Dr which includes Risk Mitigation Measures required for the property based on the results of the Risk Assessment No. 5866-CFSRVM.

The City has reviewed the most recent Risk Assessment for 73 & 95 Curtis Dr, Guelph, ON dated June 16, 2025. Below are the general comments and feedback from the City of Guelph.

**Comment number 1: Impacts to Future Drinking Water Supply**

The property is located within 380 metres southeast of the City's off-line municipal drinking water well, the Sacco well (PTTW No. 0665-CNFKM9). The Sacco well was removed from service due to TCE impacts from the early 1990s. The 2022 [Water Supply Master Plan](#) indicates that Sacco will be reinstated once the groundwater contamination in the area is remediated or treatment is financially viable for the TCE impacts.

**Comment number 2: Source Protection Plan Impacts**

The property is located within the Sacco wellhead protection area-B with a vulnerability score of 10, within Issue Contributing Area for trichloroethylene (TCE). Therefore, activities and current site maybe

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considered a significant drinking water threat to the Sacco Well, as defined by the MECP Technical Rules (2017) under the Clean Water Act (2006).

Based on the designated issue contributing area and the proximity to the Sacco Well the City has concerns related to the draft CPU No. 2484-DJ2J3K which does not include the requirement of an active remediation system. It is noted that the Phase Two ESA and Risk Assessments were completed when the remediation system was active.

Therefore, the remediation system should continue to be active to control the TCE plume on-site. The City requests that the MECP include a requirement in the CPU as outlined in Certificate of Approval No. 8330-672PHY (Industrial Sewage Works), Certificate Approval No. 2985-67QLHD (Industrial Sewage Works), and Certificate of Approval No. 7094-6B8K7W (Air) to ensure that the Property Site Standards (PSS) and Risk Management Measures (RMM) outlined remain valid for the site conditions assessed in the Risk Assessment.

Should the proponent prefer to terminate the use of the existing groundwater remediation system the conceptual site model, inclusive of groundwater delineation of TCE laterally and vertically would need to be reassessed and therefore the Risk Assessment revised to non-remedial conditions. This should include potential impacts to the City's future permitted water supply source.

We appreciate this opportunity to provide input on the proposed CPU. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at [intergovernmental.relations@guelph.ca](mailto:intergovernmental.relations@guelph.ca).

Sincerely,

**Nectar Tampacopoulos**, General Manager, Environmental Services  
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