

**September 22, 2025 – 6958 Wellington Rd 34**

	Drawing/Document	Comment
Trace Associates Inc /XCG– Thomas Kolodziej, P. Eng.	<ul style="list-style-type: none"> <li>Control Plan, 6958 Wellington Road 34, Township of Puslinch ON N3C 2V4, unauthored, unsigned, and not dated</li> <li>Map showing the Site and the extent of lands regulated by the Grand River Conservation Authority (GRCA), from the GRCA Web Geographic Information System (<a href="https://www.grandriver.ca/planning-development/map-your-property/">https://www.grandriver.ca/planning-development/map-your-property/</a>), dated May 22, 2025</li> <li>Site Alteration Permit Owner Authorization, submitted by Tim Blevins, the Site's owner, dated June 2025.</li> <li>Topsoil Sampling Results report, prepared by Stantec Consulting Ltd. (Stantec) (2025)</li> </ul>	See Attached.
Grit Engineering Inc.		See Attached.
Township of Puslinch – Andrew Hartholt, Chief Building Official		Please have the applicant show the location of the existing well(s) and septic system(s) to ensure the field enhancement work does not interfere with their function and drainage. The control plan should have countours with elevations (existing and proposed) and show the overall drainage patterns.
Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities		Public works has no concerns or comments at this time.

September 11, 2025  
Trace Project No. 900-0551-01

Submitted via email: ozhang@puslinch.ca

Township of Puslinch  
7404 Wellington Road 34  
Puslinch, Ontario N0B 2J0

Attention: Olive Zhang - Municipal Building Official

Dear Olive:

Re: Site Alteration Permit Application Review Report  
6958 Wellington Road 34, Township of Puslinch, Ontario

## **1.0 INTRODUCTION, PURPOSE, AND USE**

The Corporation of the Township of Puslinch (the Township) retained Trace Associates Inc. (Trace) to conduct a review of the information and data submitted in support of the Site Alteration Permit Application (the Application) for the property located at 6958 Wellington Road 34, Township of Puslinch, Ontario (the Site). The supporting documents provided by the Township that were reviewed by Trace included:

- Control Plan, 6958 Wellington Road 34, Township of Puslinch ON N3C 2V4, unauthored, unsigned, and not dated
- Map showing the Site and the extent of lands regulated by the Grand River Conservation Authority (GRCA), from the GRCA Web Geographic Information System (<https://www.grandriver.ca/planning-development/map-your-property/>), dated May 22, 2025
- Site Alteration Permit Owner Authorization, submitted by Tim Blevins, the Site's owner, dated June 2025
- Topsoil Sampling Results report, prepared by Stantec Consulting Ltd. (Stantec) (2025)

Based on the review of the information and data provided in support of the Application, Trace understands that the Site is approximately 59 hectares in size and comprises lands developed for residential and agricultural uses. Trace also understands that at the time the Application was submitted, approximately 1,800 m<sup>3</sup> of topsoil had been imported to the Site and stockpiled to be used in the near future to create additional area for growing crops. The site alteration activities will reportedly result in the placement of approximately 0.15 m of topsoil over an area of 17,000 m<sup>2</sup>.

The topsoil was reportedly imported from a residential development at 182 Dawn Avenue in Guelph, Ontario (the source site). The source site was reportedly used in the past for residential purposes, and no potentially contaminating activities (PCAs) were identified by Stantec in the portion of the source site from which the topsoil brought to the Site originated (Stantec, 2025). In April 2021, Stantec reportedly advanced two boreholes (BH/MW02-21 and BH09-21) at the source site within the area from which the topsoil brought to the Site originated. Stantec collected one sample from each borehole (samples BH02-21 SS1 and



BH09-21 SS1) from a depth interval of 0 to 0.6 m below ground surface. The samples were submitted for laboratory analysis of metals and inorganics, including sodium adsorption ratio (SAR) and electrical conductivity (EC), and pH (Stantec, 2025).

Stantec compared the soil sample analytical results to the Ministry of the Environment, Conservation and Parks (MECP, or the Ministry<sup>1</sup>) generic excess soil quality standards (ESQS) provided in the document titled *Rules for Soil Management and Excess Soil Quality Standards* (the Soil Rules) (MECP, 2024) and the generic site condition standards (SCS) published by the Ministry in the document *Soil, Ground Water and Sediment Standards for Use Under Part XV.1 of the Environmental Protection Act* (MOE, 2011) and adopted under Ontario Regulation (O. Reg.) 153/04 (GO, 2004). To assess the topsoil quality, Stantec compared the soil results to the ESQS for agricultural property use in a potable groundwater condition (i.e., Table 2.1 ESQS) and to the O. Reg. 153/04 background SCS for agricultural property use (i.e., Table 1 SCS). Both samples were reported to have concentrations of the analyzed parameters below the Table 2.1 ESQS and Table 1 SCS (Stantec, 2025).

As instructed by the Township, the purpose of the review conducted by Trace was to determine the following:

- Does the Application include all the required information and data listed in By-law No. 2023-057 (Puslinch, 2024)?
- Does the soil imported to the Site meet the applied soil-use and/or property-use quality standards?

This document was prepared in accordance with Trace's Professional Report Conditions (Appendix A). The scope of this document is limited to the matters expressly covered. It was prepared solely for the benefit of the Township and cannot be relied upon by any other person or entity without the express written consent of the Township and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

## 2.0 TRACE REVIEW COMMENTS

### 2.1 Permit Application Significant Data Gaps, Errors and/or Omissions

Based on Trace's review of the documents provided in support of the Application, there are several deficiencies, including missing, incomplete and/or inadequate information or data. The specific deficiencies are listed in the Schedule B Control Plans review checklist, attached as Appendix B. The following sections discuss two significant deficiencies that were identified by Trace in the documents provided in support of the Application.

#### 2.1.1 Soil Samples Not Analyzed for All Required Parameters

According to Stantec (2025), the topsoil is not considered to be excess soil and is therefore not subject to the excess soil requirements of O. Reg. 406/19 (GO, 2019). This is incorrect. O. Reg. 406/19 defines excess soil as soil, crushed rock, or soil mixed with rock or crushed rock that has been excavated as part of a project and removed from the project area (i.e., the source site) for beneficial reuse on another property (GO, 2019). Therefore, once it is removed from the source site, topsoil must be managed according to O. Reg. 406/19. Although under certain conditions topsoil can be exempt from some requirements of O. Reg. 406/19 (e.g., from Section 8, which specifies the requirements for filing a notice on the Resource

<sup>1</sup> Previously known as the Ministry of the Environment (MOE), the Ministry of the Environment and Energy (MOEE), and the Ministry of the Environment and Climate Change (MOECC). Currently known as the Ministry of the Environment, Conservation and Parks (MECP).



Productivity and Recovery Authority excess soil registry), topsoil is not automatically exempt from the excess soil requirements of O. Reg. 406/19.

As discussed in Section 1.0, Stantec only analyzed the samples of topsoil for metals and inorganics, including SAR and EC, and pH, which does not meet the minimum requirements of O. Reg 406/16. As stated in Part I, Section B, Subsection 2 (3) (14) of the Soil Rules, at a minimum, every soil sample required to be taken, whether through an in-situ sampling approach or stockpile sampling approach, must be analyzed for all of the following parameters: petroleum hydrocarbon (PHC) fractions (F)1-F4, benzene, toluene, ethylbenzene, and xylenes (BTEX), metals and hydride-forming metals, SAR, EC, and pH, as well as leachate analysis for certain contaminants as outlined in Subsection 2 (5) (MECP, 2024).

### **2.1.2 Insufficient Number of Soil Samples Analyzed**

As discussed in Section 1.0, Stantec only collected two samples from 1,800 m<sup>3</sup> of topsoil that had been imported to the Site (Stantec, 2025). In accordance with the Soil Rules, based on the volume of topsoil imported to the Site (1,800 m<sup>3</sup>), a minimum of nine soil samples should have been collected for chemical analyses, unless the Qualified Person (QP) determined that the excess soil originated outside an area of potential environmental concern (APEC) (MECP, 2024). In accordance with the Soil Rules, sampling frequencies for excess soil that originates outside the limits of the APEC are not required to meet the prescribed minimums; instead, they may be sampled at a frequency determined by the QP (MECP, 2024).

According to Stantec, the source site was used in the past for residential purposes, and no PCAs were identified to be associated with the area of the source site from which the topsoil brought to the Site originated (Stantec, 2025). Based on Stantec's Borehole Location Plan, some of the topsoil brought to the Site originated from the portion of the source site located immediately adjacent to Dawn Avenue (Stantec, 2025). Given the likely use of salt for winter maintenance along Dawn Avenue, an APEC should have been identified in the portion of the source site adjacent to this street.

Stantec did collect one sample from the portion of the source site adjacent to the street; however, it is Trace's opinion that one sample is not sufficient to determine the presence or the limits of the APEC. Furthermore, as discussed in Section 2.1.1, the samples collected were not analyzed for all of the required parameters.

## **2.2 Quality of Excess Soil Brought to the Site**

As discussed in Section 1.0, Stantec reported the two samples of topsoil to have concentrations of the analyzed parameters below the Table 2.1 ESQS and Table 1 SCS (Stantec, 2025). However, given that the topsoil was imported to the Site for growing crops, the analytical results should have been compared to the Table 1 ESQS for agricultural use, or to site-specific standards derived using either the Beneficial Reuse Assessment Tool (BRAT) or a risk assessment conducted in accordance with O. Reg. 153/04 (GO, 2004).

Trace compared the topsoil sample results to the Table 1 ESQS and confirmed that the concentrations of the analyzed parameters in both samples were below the applied Table 1 ESQS for agricultural or other property uses. However, as discussed in Section 2.1, only two samples were submitted for chemical analyses, and these samples were not analyzed for all of the required parameters.



### 3.0 CONCLUSIONS

Based on the review of the above-listed documents, Trace has concluded the following:

- The Application does not include all the required information and data listed in By-law No. 2023-057 (Puslinch, 2024).
- The information and data provided in support of the Application is not sufficient to determine if the imported topsoil meets the applied soil-use and/or property-use quality standards.

### 4.0 RECOMMENDATIONS

Based on the review of the above-listed documents, Trace provides the following recommendations:

- Additional samples should be collected from the topsoil brought to the Site. Based on the approximate volume of 1,800 m<sup>3</sup>, as specified in the Soil Rules, a minimum of nine soil samples should be collected and analyzed for PHC F1 -F4, BTEX, metals and hydride-forming metals, SAR, EC, and pH, as well as leachate analysis for certain contaminants as outlined in Subsection 2 (5) (MECP, 2024).
- The sample analytical results must be compared to the Table 1 ESQS (MECP, 2024) for agricultural or other property uses.

### 5.0 LIMITATIONS OF REPORT

The scope of this document is limited to the matters expressly covered. The Township and any other party using this document with the express written consent of the Township and Trace also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace cannot be held responsible for environmental conditions at the Site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

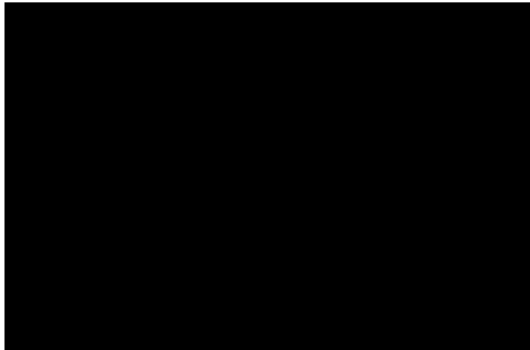
This document was prepared for the sole benefit of the Township and may not be relied upon by any other person or entity without the express written consent of the Township and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.



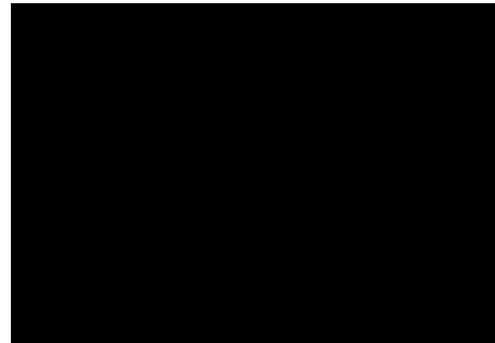
## 6.0 CLOSURE AND QUALITY MANAGEMENT

We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,  
Trace Associates Inc.



Prepared by:  
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Reviewed by:  
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Director, Ontario Region  
519.741.5774  
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TK/sc

## APPENDICES

Appendix A.....Trace Associates Inc. Professional Report Conditions  
Appendix B.....Schedule B Control Plans Review Checklist

## DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	P: Drive (Secretary)	September 11, 2025



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## 7.0 REFERENCES

- GO (Government of Ontario). (2004). Ontario Regulation 153/04: Records of Site Condition - Part XV.1, made under the Environmental Protection Act, last amendment 362/23. <https://www.ontario.ca/laws/regulation/040153>
- GO (Government of Ontario). (2019). Ontario Regulation 406/19: On-site and excess soil management, made under the Environmental Protection Act, last amendment 550/24. <https://www.ontario.ca/laws/regulation/r19406>
- MECP (Ministry of Environment, Conservation and Parks). (2024). Rules for soil management and excess soil quality standards. King's Printer. <https://www.ontario.ca/files/2024-06/mecp-rules-for-soil-june-2024-en-2024-06-17.pdf>
- MOE (Ministry of the Environment). (2011). Soil, ground water and sediment standards for use under Part XV.1 of the Environmental Protection Act. Environment and Energy, Government of Ontario. <http://www.ontario.ca/page/soil-ground-water-and-sediment-standards-use-under-part-xv1-environmental-protection-act>
- Puslinch (The Corporation of the Township of Puslinch). (2024). Site alteration by-law 2023-057. <https://puslinch.ca/wp-content/uploads/2025/01/BL2023-057-Site-Alteration.pdf>
- Stantec (Stantec Consulting Ltd.). (2025). Topsoil sampling results – southwestern corner of 42 Lowes Road West, Guelph, Ontario (revised).



## **Appendix A**

Trace Associates Inc.  
Professional Report  
Conditions



### 1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

### 2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

### 3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.



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## **4.0 LIMITATION OF LIABILITY**

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.
2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

## **5.0 DISCLOSURE OF INFORMATION BY CLIENT**

The Client acknowledges that in conducting the scope of work (the "Scope") and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

## **6.0 STANDARD OF CARE**

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

## **7.0 NOTIFICATION OF AUTHORITIES**

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace's reasonably exercised discretion.

## **8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE**

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services



("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

## **9.0 ALTERNATE REPORT FORMAT**

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

## **10.0 RECORDS RETENTION**

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

## **11.0 GOVERNING LAW**

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.



## **Appendix B**

Schedule B Control  
Plans Review  
Checklist



## BY-LAW 2023-057 SCHEDULE “B” CONTROL PLANS

REVIEW CHECKLIST FOR CONTROL PLAN DATED:		September 11, 2025		
SITE ADDRESS:		6958 Wellington Road 34, Township of Puslinch, Ontario		
Item		Included	Not included	Comments
1. A control plan(s) required to be submitted as part of any Application for a Permit pursuant to this By-law shall include, among other things, the following:				
a.	a key map showing the location of the Site;	✓	<input type="checkbox"/>	
b.	the Global Positioning System (GPS) coordinates of the centroid of the Site in terms of easting and northing;	✓	<input type="checkbox"/>	
c.	the Site boundaries and number of hectares of the Site;	✓	<input type="checkbox"/>	
d.	the use of the Site and the location and use of the buildings and other structures adjacent to the Site;	✓	<input type="checkbox"/>	
e.	the location, dimensions and use of existing and proposed buildings and other structures existing or proposed to be erected on the Site;	✓	<input type="checkbox"/>	Dimensions not provided
f.	the location of lakes, streams, wetlands, channels, ditches, other watercourses, and other bodies of water on the Site and within thirty (30) metres beyond the Site boundary;	✓	<input type="checkbox"/>	
g.	the location of the predominant Soil types;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
h.	the location, size, species, and condition of all Trees as defined in this By-law, including their dripline, and the composite dripline of all other Vegetation;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
i.	the location of driveways on the lands and all easements and rights-of-way over, under, across or through the Site;	✓	<input type="checkbox"/>	
j.	the location and dimensions of any existing and proposed stormwater Drainage systems and natural Drainage patterns on the Site and within thirty (30) metres of the Site boundaries;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		September 11, 2025	
SITE ADDRESS:		6958 Wellington Road 34, Township of Puslinch, Ontario	
Item	Included	Not included	Comments
k. the location and dimensions of utilities, structures, roads, rights-of-way, easements, highways, and paving;	✓	<input type="checkbox"/>	Only the locations of roads and structures are provided
l. the existing Site topography at a contour interval not to exceed 0.5 metres and to extend a minimum of thirty (30) metres beyond the Site boundaries;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
m. the Proposed Grade(s) and Drainage system(s) to be used upon completion of the work, which is the subject of the Permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
n. the location and dimensions of all proposed work which is the subject of the Application for a Permit;	✓	<input type="checkbox"/>	
o. the location and dimensions of all proposed temporary Topsoil or Fill stockpiles;	✓	<input type="checkbox"/>	
p. the location, dimensions, design details and specifications of all work which is the subject of the Application, including all Site Erosion and Dust Control measures or Retaining Walls necessary to meet the requirements of this By-law and the estimated cost of the same;	✓	<input type="checkbox"/>	
q. a schedule of the anticipated starting and completion dates of all proposed work which is the subject of the Application for a Permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
r. a list of the type of equipment and machinery that will be used during the Site Alteration process, including the expected days and times of operation in accordance with this By-law;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
s. provisions for the maintenance of construction Site Erosion and Dust Control measures during construction and after, as required;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
t. typical notes on the final rehabilitation plan to indicate the final ground cover materials, type and size of Vegetation to be planted, depth of Topsoil, Tree removals or Tree protection measures;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
u. proposed Site access location(s) and haul route(s) to and within the Site;	✓	<input type="checkbox"/>	



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		September 11, 2025		
SITE ADDRESS:		6958 Wellington Road 34, Township of Puslinch, Ontario		
Item		Included	Not included	Comments
v. a description of the quality and source of the proposed Fill with confirmation that the Fill meets the applicable Excess Soil Quality Standards (ESQS) (GO, 2024) for the Site;		<input type="checkbox"/>	<input checked="" type="checkbox"/>	The included information is insufficient to determine if the imported soil meets the applicable ESQS for the Site.
i. if Site-specific standards for Soil quality acceptance have been developed using the MECP's (Ministry of the Environment, Conservation and Parks) Excess Soil Beneficial Reuse Assessment Tool (BRAT) ( <a href="https://www.ontario.ca/page/handling-excess-soil">https://www.ontario.ca/page/handling-excess-soil</a> ), a copy of the BRAT model input and output and a signed statement by the Qualified Person preparing the BRAT model;		<input type="checkbox"/>	<input type="checkbox"/>	Not Applicable (N/A)
ii. If Site-specific standards for Soil quality acceptance have been developed using a risk assessment pursuant to the requirements in the Rules for Soil Management and Excess Soil Quality Standards (GO, 2024), a copy of the risk assessment and a signed statement by the Qualified Person who prepared the risk assessment model must be submitted;		<input type="checkbox"/>	<input type="checkbox"/>	N/A
w. a Sampling and Analysis Plan (SAP) for the source of the proposed Fill;		<input type="checkbox"/>	<input checked="" type="checkbox"/>	
x. a Quality Assurance/Quality Control (QA/QC) Program;		<input type="checkbox"/>	<input checked="" type="checkbox"/>	
y. the scale of drawings, either 1:500 or 1:1000;		<input type="checkbox"/>	<input checked="" type="checkbox"/>	1:1500
z. operational procedures manual;		<input type="checkbox"/>	<input checked="" type="checkbox"/>	
aa. for Site to receive greater than 10,000 m <sup>3</sup> , and where required by the provisions of Ontario Regulation 406/19 (GO, 2019), as amended, file a notice on the Excess Soil Registry operated by RPPA (Ontario Resource Productivity and Recovery Authority); and		<input type="checkbox"/>	<input type="checkbox"/>	N/A - Only approximately 1,800 m <sup>3</sup> of excess soil (topsoil) was imported to the Site
bb. all other information as deemed necessary or required by the Designated Official.		<input type="checkbox"/>	<input type="checkbox"/>	N/A



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		September 11, 2025	
SITE ADDRESS:		6958 Wellington Road 34, Township of Puslinch, Ontario	
Item	Included	Not included	Comments
2. Where a permit from the County of Wellington or the Township is required to use any portion of the proposed haul route, the issuance of, and conformity with such permit(s) shall be deemed to be a condition of the issuance of the Permit under this By-law.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. It shall be the responsibility of the Owner to ensure that all Fill which is Placed or Dumped under this By-law shall conform with, and meet, the requirements of this By-law and all conditions of the Permit. At any time during the term of the Permit, an Inspector or the Designated Official may require evidence of such conformity, including, without limiting the generality of the foregoing, a requirement that the Permit Holder provide evidence to the satisfaction of the Designated Official that each Truckload complies with the requirements of this By-law.	<input type="checkbox"/>	<input type="checkbox"/>	N/A (to be determined by the Corporation of the Township of Puslinch)
4. Every control plan accompanying an Application for a Permit under this By-law must be stamped by a Qualified Person approved by the Designated Official.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The <i>Control Plan</i> is not sealed/signed.
5. Notwithstanding any other provisions of this By-law, the Designated Official may waive the requirement for a Control Plan or any part thereof, after taking into consideration the proposed works and the anticipated impact on the Site and the surrounding environment.	<input type="checkbox"/>	<input type="checkbox"/>	N/A

## REFERENCES

GO (Government of Ontario). (2019). *Ontario Regulation 406/19: On-site and excess soil management, made under the Environmental Protection Act*. <https://www.ontario.ca/laws/regulation/r19406>

GO (Government of Ontario). (2024). *Rules for soil management and excess soil quality standards*. Ontario Ministry of Environment, Conservation and Parks. <https://www.ontario.ca/files/2024-06/mecp-rules-for-soil-june-2024-en-2024-06-17.pdf>



September 9, 2025

Olive Zhang  
Building Services Technician  
Township Of Puslinch  
7404 Wellington Road 34  
Puslinch, ON N0B 2J00

**Large Site Alteration Permit Application Review  
6958 Wellington Road 34, Puslinch, ON**

GRIT Engineering Inc. (GRIT) was retained by the Township of Puslinch Building Department to complete a technical review of the Large Site Alteration Permit Application for 6958 Wellington Road 34 in Puslinch, Ontario. The practitioner of record for civil engineering is unknown as such GRIT has not attempted to contact the practitioner on the application to inform them of a Technical Review, per Section 6.1.1 Technical Reviews of the Professional Engineers Reviewing Work Prepared by Another Professional Engineer Guideline (PEO, October 2011). It is understood that this is an ongoing project, and GRIT has not been on site to date. GRIT's technical review is limited to civil engineering scope. It is understood Trace Associates is to provide excess soil and environmental engineering review concurrently.

GRIT has been provided with the following updated documents submitted for the application for our review:

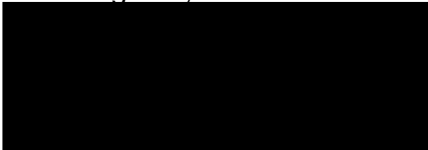
- Municipal Development Standards (MDS), Township of Puslinch, dated September 2019.
- Township of Puslinch Comprehensive Zoning By-Law No. 023-18, dated May 2021.
- Township of Puslinch By-Law Number 2023-057
- Large Site Alteration Permit Requirement Checklist and Process.
- Letter: Stantec Consulting Ltd., Topsoil Sampling Results-Southwestern Corner of 42 Lowes Road West, Guelph, June 5, 2025
- Letter: Stantec Consulting Ltd., Topsoil Sampling Results-Southwestern Corner of 42 Lowes Road West, Guelph, June 9, 2025 revised August 27, 2025
- Drawing: Reids Heritsge Homes, Control Plan, 6958 Wellington Road 34, Township of Puslinch, dated June 9, 2025
- Letter: Township of Puslinch, Haul Route Permit, June 2, 2025
- Drawing: GRCA Mapping, Pennbridge Farms, date unknown
- Site Alteration Permit Owner Authorization, dated June 20, 2025, signed by Tim Blevins
- Letter: Chung & Vander Doelen, Technical Memorandum, Site Alteration Permit Requirement Relief, 7096 Gore Road, Puslinch, dated July 2, 2025

**Review Comments – Civil**

The following items should be addressed/considered on the Control Plan as Per the Large Site Alteration Permit Checklist;

1. Existing Site topography at a contour interval not to exceed 0.5 metres and to extend a minimum of thirty (30) metres beyond the Site boundaries. It is important to show existing and proposed contours to understand if existing drainage patterns will be maintained. It is suggested the applicant could use GRCA LiDAR data (if available) to save topographic survey costs.
2. Confirm fill placement will not impact existing service locations, example the septic system or well location.

Kind regards,



**GRIT Engineering Inc.**  
**Montana Wilson, EMBA, M.Eng, P.Eng, PMP**  
CEO  
*montana@gritengineering.ca*