# Comment Summary – 6676-6678 Wellington Rd 34

### Preconsultation

Joe Nethery – Township Planning Consultant	Comments pending				
GEI – Township Engineers	See letter attached				
County Planning Comments	Comments pending				
Hydrogeology Comments	See letter attached				
Ecology Comments	See letter attached				
Township of Puslinch Fire Department	No comments				
Township of Puslinch Building Department	1. Clarify the use of the "office" building that is labelled on "Figure 2" drawing provided. Will this be used only as an office? Provide preliminary floor plans to support the proposed/existing use.  2. Building Permits are required for the office, septic system and any retaining walls greater than 1m in height that have been built without the benefit building permit.  3. The existing office exceeds 600m2 and will be considered a part 3 building under the building code which will require adequate fire water storage on site and fire routes. Ensure the site plan is updated to reflect the office's actual building area.  4. Provide an updated site plan showing all the site features including retaining walls, fire routes (show 6m widths and slope), existing buildings and				

	areas, septic systems, fire water storage (size and location), fuel storage and any other site feature related to the proposed operations.
Township of Puslinch Property Standards & By- law Enforcement	No comments
Township of Puslinch Public Works Department	No comments
Sourcewater	See attached
County Transportation Department	No comments
Township Noise Consultant	See letter attached
GRCA	No comments



February 13, 2025 Project No. 2402574 / 120006-017

VIA CLOUDPERMIT: Township of Puslinch

Lynne Banks Township of Puslinch 4704 Wellington Road 34 Puslinch, ON NOB 2J0

Re: Pre-Consultation Request
Township File No. D00-ONT
6676-6678 Wellington Road 34
Puslinch, ON

Dear Ms. Banks:

Following our review of pre-consultation application documents received on January 30, 2025, we are providing comments related to an existing operation on the subject lands located at 6676-6678 Wellington Road 34 in the Township of Puslinch. It is our understanding that the proposed application is a Temporary Use By-Law Amendment for a portion of the site to permit management of liquid waste.

A Zoning By-Law Amendment application was previously submitted for this property and was denied by the Township. A Temporary Use By-Law would permit a land-use that is otherwise prohibited by the Zoning By-Law on the subject lands for a duration of three years.

In support of the identification of engineering requirements, the following documents were received and reviewed:

- Cover Letter, prepared by GSP Group, dated January 27, 2025.
- Figure 2 (Site Layout), prepared by GHD, dated April 13, 2023.

We provide the following requirements in support of Temporary By-Law Amendment:

- **Site Plan**, generally showing existing and proposed aboveground and underground infrastructure, including but not limited to:
  - Buildings
  - Soil offloading, processing, stockpiling and screening locations
  - Outdoor storage areas
  - Parking areas, loading areas, driveways and walkways
  - Lighting, signage, and fencing
  - Wells and septic system
  - o Fire routes and fire protection infrastructure
  - Stormwater management infrastructure
  - Property boundaries and limits of operations and zoning.
- **Site Grading and Servicing Plan**, generally showing existing and proposed drainage patterns on the subject lands, confirming legal drainage outlet, and showing existing and proposed infrastructure and services, including but not limited to water lines, septic systems, sanitary sewers, storm sewers and stormwater management facilities.
- **Erosion and Sediment Control Plan**, providing provisions for the control of sediment and potential erosion during construction to limit impacts on surrounding areas and infrastructure.
- **Spills Management Plan,** to document the control of potential spills or contaminated liquid soils on the property.
- Site Servicing and Stormwater Management Report, detailing:
  - The existing conditions of the site and any proposed changes to existing infrastructure or operations.
  - How stormwater management and management of imported liquid soil and associated runoff is and will be provided for the site as required by Township standards and MECP guidelines, including:
    - Stormwater and liquid soil runoff quantity control (including stormwater management pond volumes, drawdown times and flow rates under existing and proposed conditions).
    - Stormwater and liquid soil runoff quality control (including TSS removal calculations and sediment removal frequency calculations under proposed conditions).
    - Water balance (including groundwater recharge rates and volumes).
    - Protections and controls related to offloading, stockpiling and processing of potentially contaminated liquid soils.
  - Grading and drainage considerations, including overland flow route and legal outlet.
  - o Erosion and sediment controls.
  - Geotechnical and hydrogeological considerations.
  - How the site is serviced by potable water and wastewater servicing.
  - Transportation considerations.

The existing stormwater management pond appears to encroach onto adjacent property. Are there any concerns that this could be an issue in present day or in the future if either property is sold?

The Township Hydrogeologist should comment on hydrogeological study requirements and potential groundwater contamination concerns related to site operations.

The Puslinch Fire Department should comment on requirements for fire protection and access.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng. Project Engineer



Parth Lad, E.I.T. Technical Specialist



Harden Environmental Services Ltd. 4622 Nassagaweya-Puslinch Townline Moffat, Ontario, LOP 1J0 Phone: (519) 826-0099 Fax: (519) 826-9099

Groundwater Studies

Geochemistry

Phase I / II

Regional Flow Studies

Contaminant Investigations

**OMB** Hearings

Water Quality Sampling

Monitoring

Groundwater Protection Studies

Groundwater Modeling

Groundwater Mapping

Permits to Take Water

Environmental Compliance Approvals

Our File: 2135

March 13, 2023

Township of Puslinch 7404 Wellington Road 34 Guelph, ON, N1H 6H9

Attention: Mr. Glenn Schwendinger

CAO

Dear Glenn;

# Hydro-Vac Truck Disposal Area: 6678 County Road 34, Puslinch Township

We have received and reviewed additional draft information provided by the applicant. In response to concerns related to the permeable and vulnerable underlying aquifer condition, the following measures are suggested;

- Offloading of slurry on impermeable base
- Drainage of slurry through a lined drainage channel
- Storage of water in a lined pond with a control structure
- Release of water only when tested "clean" in comparison to Table 2 Potable Groundwater Criteria (Full Depth Generic Site Condition Standards in a Potable Ground Water Condition All Types of Property Use, as provided in the Table 2 of the MECP document entitled "Soil, Ground Water and Sediment Standards for Use Under Part XV.1 of the Environmental Protection Act", dated April 15, 2011).
- Water released to existing aggregate pond for irrigation or infiltration

In comparison to the present ongoing operation, the proposed measures reduces the risk of groundwater contamination from the offloading of untested slurries from the Hydro-Vac Trucks.

It remains our recommendation to the Township of Puslinch to not permit this activity through a zoning amendment. The ongoing and

proposed activity does not fall within the permitted activities for the existing zoning and the requested activities come with risk to the underlying groundwater resources.

The Township and County adopted the Paris and Galt Moraine Policies to protect the groundwater resources lying thereunder. The underlying geological formations are the source areas for local water supplies. The only available water supply comes from the groundwater aquifers and despite all assurances provided to date, the requested activity involves the offloading of untested sediment/water slurries. Although containment, testing and conditional release of water procedures will be in place, it remains our opinion that the hydrogeological setting is inappropriate for this activity given the reliance of local residents on the groundwater resource. In addition, there is continued pressure from the City of Guelph and Region of Waterloo for additional groundwater resources sourced from this area.

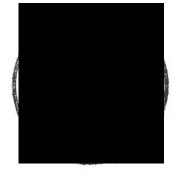
There are suitable locations for this type of activity below the escarpment where there are lake-based municipal drinking water systems and low permeability soils. There are also hydrogeologically suitable areas north of Guelph where lower permeability formations at surface do not allow for rapid transmission of contaminants to aquifers.

Given an opportunity to deny this activity, we continue to recommend that the Township prohibit this activity at this site.

Sincerely,

Harden Environmental Services Ltd.

Stan Denhoed, P.Eng., M.Sc. Senior Hydrogeologist





February 14, 2025

Lynne Banks Development and Legislative Coordinator Township of Puslinch 7404 Wellington Rd. 34, Puslinch, ON NOB 2J0

### RE: 6678 Wellington Rd. 34 Puslinch Pre-Consultation Request - File # D00-ONT

Thank you for inviting Dougan Ecology to provide comments on the pre-consultation request for the above listed property.

A Zoning By-law Amendment was previously submitted for this property alongside an EIS prepared by GHD (2022). This application was refused by the Township following review. The Owner is now proposing a Temporary Use By-law Amendment for a portion of the site, representing 2.16 ha previously used for management of liquid soil. The temporary use provisions would allow the management of liquid waste on the site, for a period of up to 3 years. Following this it would be eligible for an extension of an addition 3 years following Council approval.

The proposed liquid waste management area is located within 120 m of natural heritage features that may be impacted by this work, including:

- Oil Well Bog Little Tract Regional Life Science ANSI;
- Significant Woodlands;
- Significant Wildlife Habitat (confirmed and candidate);
- Species at Risk habitat;
- Waterbodies; and
- Wildlife Corridors

Natural heritage policy applicable to the site includes:

Migratory Birds Convention Act (1994)



- Provincial Planning Statement Natural Heritage policies (2024)
- Growth Plan for the Greater Golden Horseshoe (2020)
- Paris Galt Moraine Conservation Act (2019)
- Wellington County Official Plan Greenlands (2021)
- County of Wellington Forest Conservation Bylaw 5115-09
- Township of Puslinch Zoning By-law (2018)

The previous EIS was prepared by GHD (2022) in support of a Zoning By-law Amendment for proposed hydro-vac operations on the site. Given that the proposed activities have changed (i.e. the current proposal is for liquid waste disposal), a revised EIS is required to demonstrate natural heritage policy compliance and address potential direct, indirect and cumulative impacts to natural heritage features.

It is expected that the EIS could be largely based on existing background data presented in GHD's EIS (2022) with a revised assessment of impacts, appropriate avoidance, mitigation and enhancement strategies to demonstrate no negative impact to existing natural heritage features and ecological functions. The EIS should clearly demonstrate how the proposal is compliant with federal, provincial, regional, and local natural heritage policy.

We trust this assists the Township in developing the next steps regarding this application.

Sincerely,

Manager of Ecology

Christina Olar, B.Sc. Eco. Mgmt. Tech. ISA Todd Fell, OALA, CSLA, CERP Principal, Manager of Landscape Architecture



## Source Water Protection – Planning Application Requirements

**Section 1: Property and Application Information** 

As part of the *Clean Water Act* and Source Protection Plan requirements, all proposed development that is subject to a *Planning Act* application on lands located within a vulnerable area shall ensure that proposed development work does not result in a threat to municipal drinking water quality and/or quantity.

nagement Office	2			
ZBA Application ⊠ □	Site Plan Application ⊠ ⊠	Not Required □ □		
owner or their	agents			
Application	Application  Application	Not Required		
	Plan of Condor Type:  nagement Office  ZBA Application  Cowner or their  ZBA Application  COMPANIES  Application  COMPANIES  C	ZBA Site Plan Application Application  SOUTH STATE STA		

Please see <u>Appendix B</u> for required documentation descriptions. Please note, if it is determined that a Site Plan Application is not required, the above noted studies must be completed in support of the ZBA

application.



#### **Section 4: Site specific information**

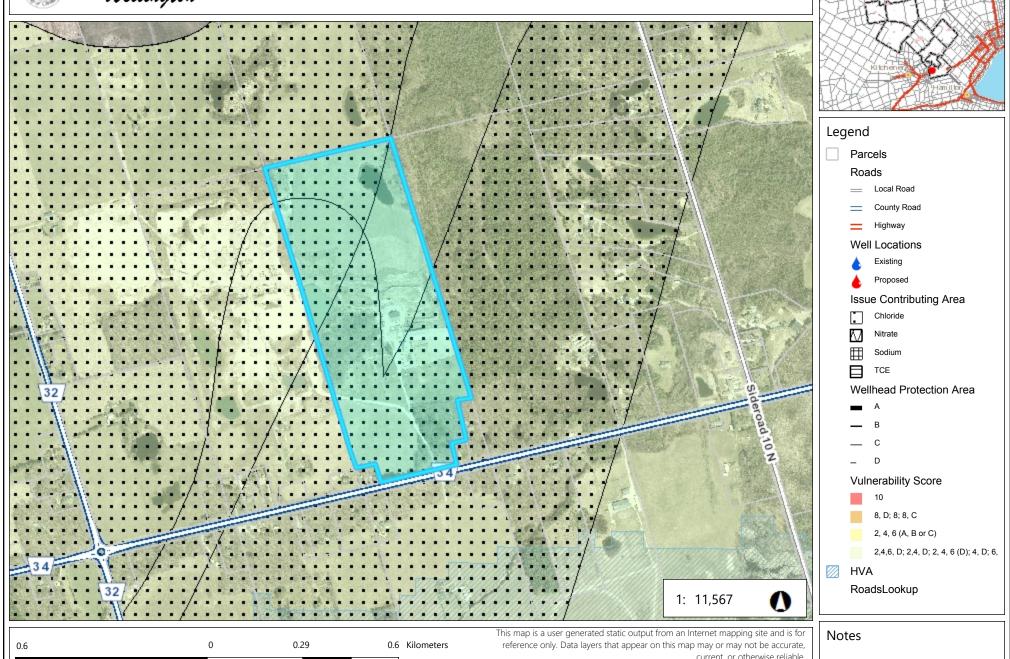
Wellhead Prot	ection Ar	ea (WI	HPA) a	nd Vuli	nerability Sc	ores:				
WHPA	□ A [	⊐в	□С	⊠D	⊠ Q	Score ⊠ 2	⊠ 4	□ 6	□ 8	□ 10
Issue Contribu	ting Area	(ICA):	□ No	ne 🏻	☑ Chloride	☐ Trichloroet	thylene		Nitrate	☐ Sodium
Significant Gro	undwate	r Rech	arge A	rea: ⊠	Yes □ N	0				
Highly Vulnera	ble Aquif	er: 🗆	Yes	⊠ No						
For more infor	mation, p	olease	conta	ct <u>sour</u>	cewater@ce	entrewellington	<u>ca</u> .			
Sincerely,										
Kim Funk, Sou	rce Prote	ction C	Coordi	nator						
519-846-9691	ext. 283									
kfunk@centre	wellingto	n.ca								
Attachment:	WHPA I	Map(s)	)							
Resources:	Appendix A: Contact & Proposal Information									
	Appendix B: Source Water Protection required document descriptions									
	Append	lix C: G	Guidan	ce doc	uments					

Please note that the requested documentation is applicable as per the information available as of the date signed above. If the proposed application type and/or proposed use changes, there may be additional requirements. Future planning and/or building applications may have additional requirements beyond those listed above or may require reports listed as "not required", based on the information provided at the time of application.

Appendix D: Water Balance Terms of Reference



# 6678 Wellington Road 34, Puslinch



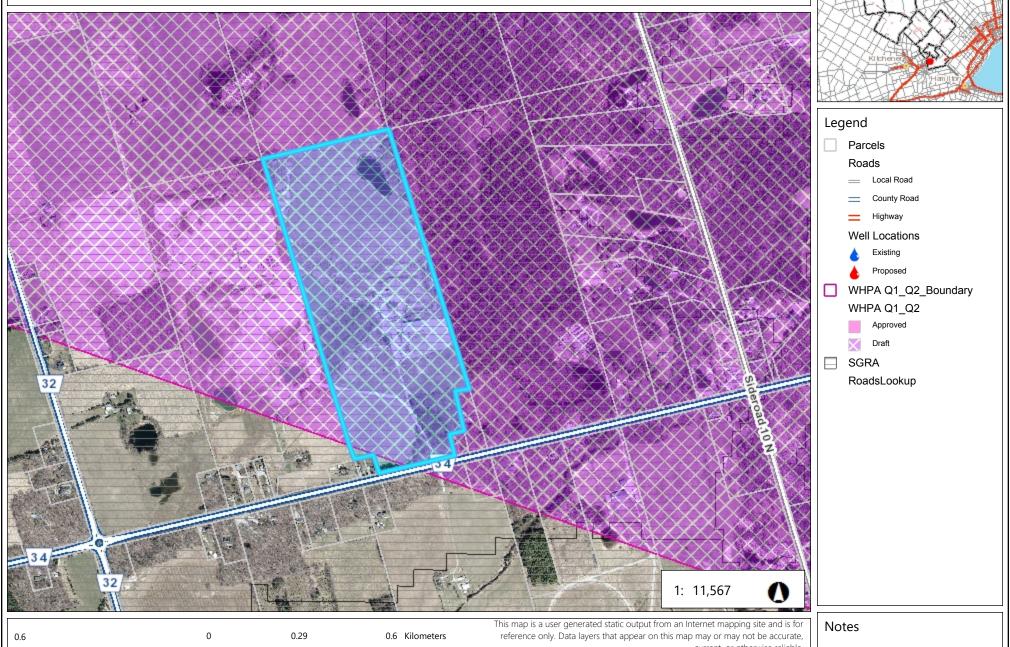
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# 6678 Wellington Road 34, Puslinch - Quantity



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Sound solutions to acoustical challenges
Celebrating over 60 years
30 Wertheim Court, Unit 25
Richmond Hill, Ontario, Canada, L4B 1B9

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web • www.valcoustics.com
telephone • 905 764 5223
fax • 905 764 6813

VIA E-MAIL

February 19, 2025

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

Attention: Lynne Banks

lbanks@puslinch.ca

Re: Temporary Use By-Law Amendment Application

**Liquid Waste Management Facility** 

Puslinch, Ontario VCL File: 122-0269

Dear Ms. Banks:

We have completed our review of the January 27, 2025 letter, prepared by GSP Group, requesting a Pre-Consultation meeting to discuss a Temporary Use By-Law Amendment application. Comments regarding the request are outlined herein.

It appears that the proposed temporary use for a portion of the site is the same or similar to the one previously proposed. The temporary use would initially be permitted for up to three years when the use could be reviewed and extended for a further three years. Even though the use is temporary, it is of long enough duration where potential noise impacts on sensitive receptors in the vicinity is a concern. Thus, the sound emissions from the facility should be mitigated to ensure the noise guideline limits for stationary noise sources in NPC-300 are met.

A noise study was previously prepared in support of the proposed waste processing facility to be located at this location. The noise study was peer reviewed by Valcoustics Canada Ltd. with outstanding items outlined in our letter dated March 16, 2023. A noise study supporting the proposed temporary use and addresses the outstanding previously identified issues should be included as part of the submission requirements. The temporary use should be considered a stationary noise source as defined in MECP Publication NPC-300.

As stated in the GSP Group letter, compatibility is an item that Council would have regard for. The noise study would be part of demonstrating land use compatibility for the proposed temporary use.



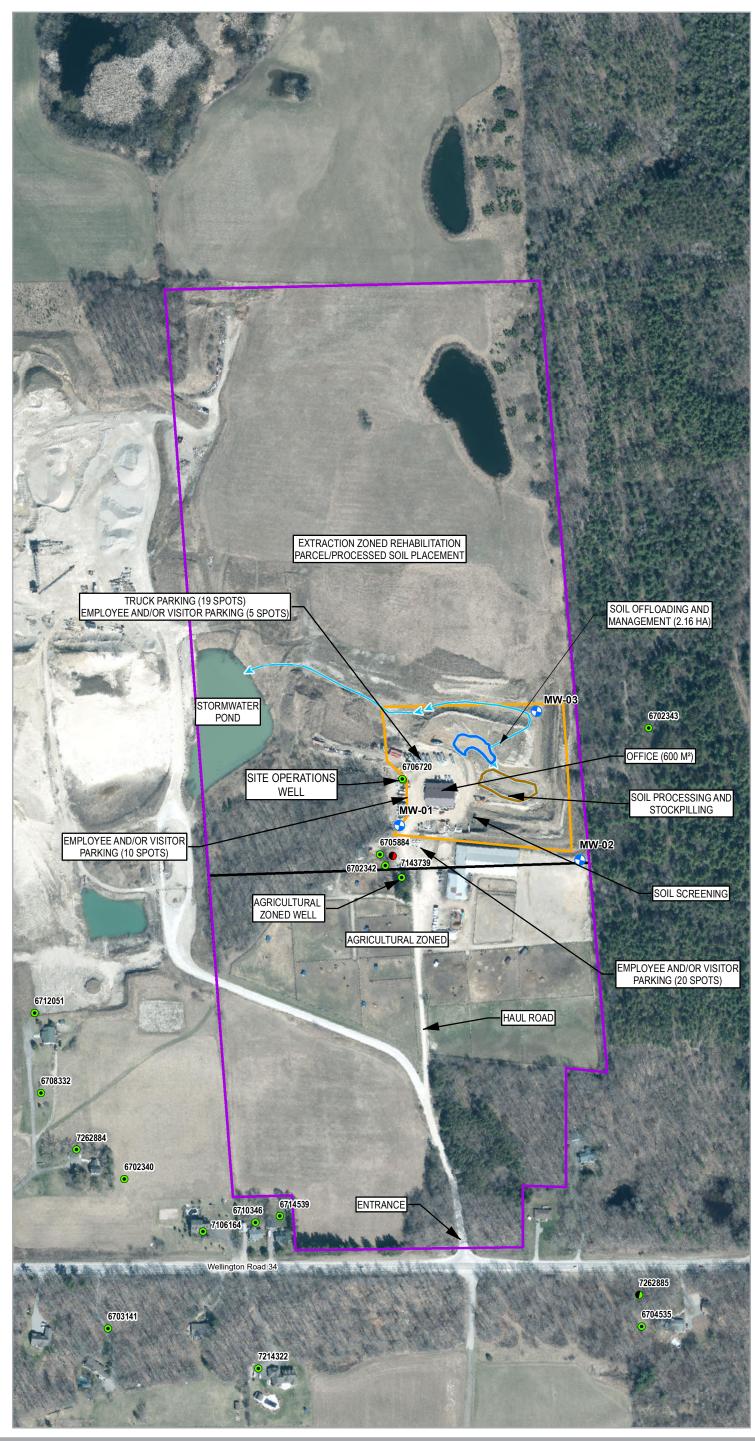
If there are any questions, please do not hesitate to call.

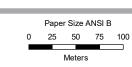
Yours truly,

### **VALCOUSTICS CANADA LTD.**

Per: John Emeljanow, P.Eng.

JE\ 2025-02-19 Pre Con Request Review V1.0.docx





Map Projection: Transverse Mercator
Horizontal Datum: North American 1983 CSRS
Grid: NAD 1983 CSRS UTM Zone 17N



2374868 ONTARIO INC. 6678 WELLINGTON RD 34 TOWNSHIP OF PUSLINCH, ON Project No. 11210029

Revision No. 
Date Apr 13, 2023

SITE LAYOUT

FIGURE 2

Legend

ledow

Water Supply

Abandoned-Supply

Abandoned-Other

Monitoring Well

Drainage Swale
Temporary Pond

Unloading/Drainage Area
Site/Operations Boundary

Property Boundary





January 27, 2025

File No. 24038

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

Attn: Lynne Banks

Development and Legislative Coordinator

Re: 6678 Wellington Road 34

**Pre-Consultation Meeting Request** 

**Temporary Use By-law Amendment Application** 

Dear Lynne,

On behalf of 2374868 Ontario Inc. (the "**Owner**"), GSP Group is pleased to submit the following letter as part of our formal request for a Pre-Consultation Meeting to discuss a proposed Temporary Use By-law Amendment application (the "**Application**") for a portion of the property located at 6678 Wellington Road 34 in Puslinch (the "**Site**").

#### **Background Information**

The entire property at 6678 Wellington Road 34 in Puslinch is 39.4 hectares in size and has frontage onto Wellington Road 34. The northern part of the site is a gravel pit mostly under rehabilitation pursuant to a License under the *Aggregate Resources Act* ("**ARA**") issued by MNR. As part of those operations, liquid soil was processed and used for the rehabilitation of the gravel pit.

The Site is designated Secondary Agricultural and Greenlands in the County of Wellington Official Plan. The Site currently has dual zoning. The south portion of the Site is zoned Agricultural with special provision 13 (Asp13). Within the Asp13 zone, agricultural uses, normal farm practices and farm related businesses are permitted. The north portion is currently zoned Extractive Industrial with special provision 63 (EXIsp63). The Extractive Zone permits uses as regulated under the MNRF license.

On October 10, 2024, the Ministry of Environment, Conservation and Parks (the "MECP"), issued an Environmental Compliance Approval ("ECA") (Waste) for the Site. The application for the ECA was applied for under section 20.2 of Part II of the Environmental Protection Act, for approval of a waste disposal site to be used for the processing of excess soil, including liquid soil. The ECA provides for, among other items, comprehensive soil, surface water and groundwater sampling, monitoring, reporting and contingency programs.

On October 10, 2024, the MECP also issued an Air and Noise ECA for the Site. The approval governs the air and noise emissions from the hydrovac processing equipment and operations. The ECA provides for, among other items, a comprehensive operation and maintenance program for trucks and processing equipment.

On November 5, 2024, the MNR approved the spilt of License #20085 between Capital Paving Inc. and the Owner, creating License #626648 which governs all of the licensed area on the Owner's property.

The Owner is currently in the process of removing the area that is subject to the ECA for the processing of liquid soil from the ARA license, which would come into force upon the rezoning of the site.

#### **The Application**

We understand that a Zoning By-law Amendment was previously submitted for the property and was refused by the Township.

The Owner is now proposing a Temporary Use By-law Amendment for a portion of the Site within the EXIsp63 zone representing the area on the Site previously used for the management of liquid soil (see **Figure 1** attached), which is 2.16 hectares in area. The temporary use provisions would permit the management of liquid waste on the Site, for a period up to 3 years. After 3 years, the use could be reviewed and extended for an additional 3 years, subject to Council approval. All other uses associated with the operations are permitted under the amending License #626648 with the MNR and the MECP Waste and Air & Noise ECAs.

Section 13.4 of the County of Wellington Official Plan states that a by-law may be passed by a local council to allow the temporary use of land for a purpose that is otherwise prohibited by the Official Plan or Zoning By-law. A Temporary Use By-law may not exceed three years but may be extended. When considering a Temporary Use By-law, Council would have regard for the following: the likely duration; compatibility; the adequacy of services; access and parking; impact assessment; and general conformity with the County Official Plan.

The demand for liquid waste disposal sites is expected to increase due to a number of factors, including:

- Growing volume of liquid waste: As urban areas expand and infrastructure projects are
  completed, so does the amount of liquid waste generated from hydrovac operations. Hydrovac
  operations are a critical infrastructure service used by municipalities, utilities and landowners
  to prevent inadvertent underground utility strikes and support emergency services such as
  power line failures and water main breaks.
- Environmental Awareness: As environmental awareness grows, so does the need for advanced liquid waste treatment. With approved ECAs, there are extensive and

comprehensive environmental and other measures in place that will ensure protection of the natural environment. Providing an approved liquid waste disposal site will prevent illegal dumping. Illegal dumping can cause health concerns and long-term environmental damage.

Lack of Local Sites: A liquid waste disposal site will service local municipalities who are
actively involved in ongoing infrastructure projects. This also includes local utilities including
gas and hydro companies. Currently, liquid soil being collected in Waterloo Region/Wellington
County is hauled to the closest waste disposal site located in Stoney Creek, ON. This means
greater costs to the municipality and the utility and ultimately the public to haul the waste to
another municipality, as well as greater impact to the environment due to truck travel and
associated consumption of gas, diesel fuel and emissions.

We look forward to meeting with the Township to discuss the proposed Temporary Use By-law to permit the management of liquid soil on the Site as a temporary use. We believe there is a benefit between the proposed use and the continued need for the rehabilitation of the licensed former gravel pit, as well as a benefit to the wider community by providing a certified disposal site for liquid soil.

We look forward to receiving pre-consultation comments and meeting with staff and agencies to discuss this proposal further.

Sincerely, GSP Group Inc.

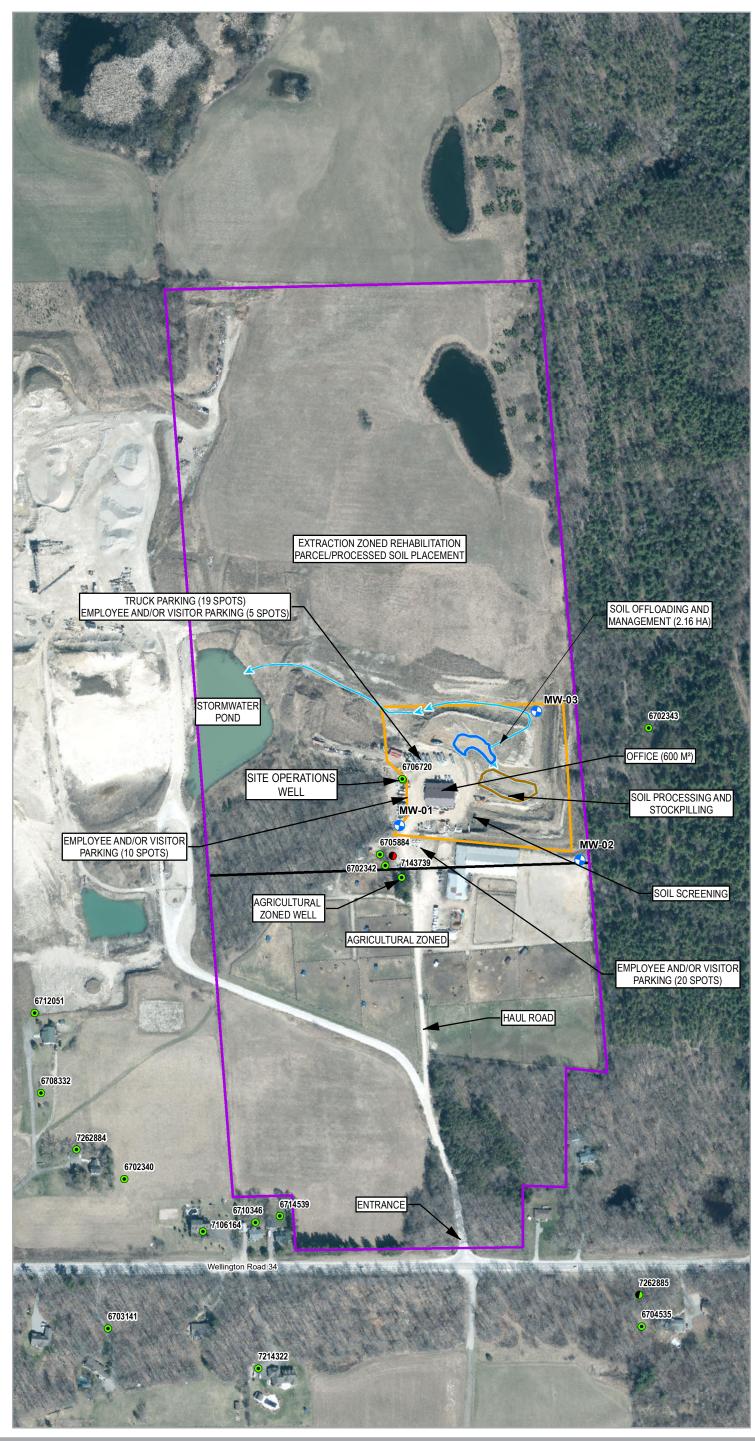


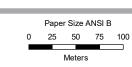
Hugh Handy, MCIP, RPP Vice President

Cc: Frank Ertl, Owner Fred Taylor, GHD Amelia Soutar, GHD



Valerie Schmidt, MCIP, RPP Planning Development Manager





Map Projection: Transverse Mercator
Horizontal Datum: North American 1983 CSRS
Grid: NAD 1983 CSRS UTM Zone 17N



2374868 ONTARIO INC. 6678 WELLINGTON RD 34 TOWNSHIP OF PUSLINCH, ON Project No. 11210029

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