

Our ref: 11210029-ERTL-LTR-16

16 December 2025

Frank Ertl
2374868 Ontario Inc.
6678 Wellington Road 34
Cambridge, Ontario
N3C 2V4

**Response to Review of Temporary Use By-Law Amendment Application by
Wellington Source Water Protection – 6678 Wellington Road 34, Puslinch, Ontario**

Dear Frank,

1. Introduction

On July 2, 2025 GSP Group Incorporated (GSP) submitted a Zoning By-law Application (ZBA) to the Township of Puslinch (the Township) to permit the temporary use of a liquid soil management operation (the Proposed Use) on a portion of the property for a period of up to three years that would include the following:

- A 1 storey 650 square foot office and maintenance building
- 25 hydro-vacuuming (hydro-vac) truck parking spaces
- 35 employee/visitor parking spaces
- Private servicing including:
 - Water supply wells
 - A firefighting water cistern
 - A holding tank and leach field
- Area for soil offloading and management
- Area of soil processing and stockpiling (unloading and drainage area)
- Temporary pond and drainage swale leading to an existing stormwater management pond
- An area for soil screening

Wellington Source Water Protection (WSWP) has reviewed the comments provided to the Township and on August 19, 2025 provided a memorandum of comments to the Township of Puslinch that were then issued to 2374868 Ontario Incorporated (the Proponent) on November 3, 2025. On behalf of the Proponent, GHD Limited (GHD) has prepared this letter to provide responses to the comments, as requested within the WSWP memorandum. The memorandum was organized into two sections following a brief background: Clean Water Act Section 59 Notice & Risk Management Plan, and Land Use Planning. For convenience, each comment has

been organized below into these same section headings and copied in bold italics below. GHD's responses to each of these comments then follows in plain text.

2. Clean Water Act Section 59 Notice & Risk Management Plan

WSWP Comment No. 1:

Section 59 Notices are required for all applications. The Notice to deem the Zoning By-law Amendment Application Complete was provided to the Township's Planning Department on 2025/08/19. Additional Notices are required for all future Planning Act and Building Permit applications.

Noted. No further action is required by the Proponent until such time they may submit future Planning Act and Building Permit applications.

WSWP Comment No. 2:

A Risk Management Plan for winter maintenance activities and chemical handling and storage (DNAPL's) will be required for this property. This will be drafted by our office, sent to the owner for review and is required to be issued along with the Section 59 Notice for building permit issuance

Noted. No further action is required by the Proponent until WSWP issues the Risk Management Plan for winter maintenance activities and chemical handling and storage (DNAPLs).

3. Land Use Planning

WSWP Comment No. 3:

WSWP request that the owners or their agents submit the following plans, reports or documentation to the satisfaction of the Township Risk Management Official:

- 1. Documentation that a flow meter will be installed, and its data will be available upon request for review by the Township and Risk Management Office.***

Based on this comment, GHD is presuming that WSWP is referencing the on-Site water supply well, APW1. Groundwater pumping from this well is less than 50,000 litres per day (L/day) and therefore less than the requirements that would necessitate a permit to take water (PTTW) and the corresponding pumping reporting requirements. Furthermore, much of the water removed from this well is returned to the Site and recharges groundwater and the Proponent has never received complaints related to interference with domestic supply wells. Nevertheless, the proponent will install a flow meter onto APW1 and record volumes pumped on a daily basis with the exception that on weekends and statutory holidays, the pumped volumes will be recorded on the next business day and rates will be averaged across each of the non-business days. These data will be available upon request for review by the Township and Risk Management Office.

WSWP Comment No. 4:

WSWP request that the owners or their agents submit the following plans, reports or documentation to the satisfaction of the Township Risk Management Official:

- 2. Documentation that any unused wells are decommissioned as per Ontario Regulation 903. If no unused wells are present on the property, please confirm this in a future submission.***

On August 27, 2020 GHD participated in a Site inspection for the purpose of identifying the on-Site wells at that time. Site inspectors referenced the Ministry of Environment, Conservation and Parks' (MECP's) Water Well Information System (WWIS), an on-line water well record database. The well locations provided in the WWIS are commonly only estimated by MECP in their mapping. The WWIS identifies one on-Site well, identified as 7143739, as being abandoned. However, based on the sketch map prepared by the driller at the time of drilling, that well is actually situated approximately 4 kilometres east of the Site, between County Road 35 and the Hanlon Expressway. No on-Site wells have been abandoned. There are no unused wells at the Site. All monitoring and supply wells are monitored and sampled regularly.

WSWP Comment No. 5

WSWP request that the owners or their agents submit the following plans, reports or documentation to the satisfaction of the Township Risk Management Official:

3. Documentation of all provincial approvals required for this property, including Environmental Compliance Approval and Permits to Take Water.

Waste Environmental Compliance Approval (ECA) A-500-4277838045 and Air & Noise ECA A-500-3223236868 are provided in Attachment 1. There is no requirement for a Permit to Take Water for this property as pumping from APW1 and AGW1 are less than 50,000 L/day.

WSWP Comment No. 6

Report: Response to Source Water Protection - Hydro-Vac Truck Disposal Area Zoning Amendment: 6678 County Road 34, Puslinch Township, dated June 9, 2025:

The above report indicates that this site is not located within an Issue Contributing Area for Chloride, which is incorrect. Please refer to the Grand River Source Protection Plan, approved July 29, 2025, which confirms the Chloride ICA. Source Protection Plans are amended prior to Official Plans and Zoning Bylaws. Please update the mentioned report with the correct vulnerability scoring for this property.

Noted. In preparing the letter report *Response to Source Water Protection – Hydro-Vac Truck Disposal Area Zoning Amendment: 6678 County Road 34, Puslinch Township* (GHD, 2025)¹, GHD consulted geographic information system (GIS) mapping provided by the Grand River Conservation Authority, the Grand River Source Protection Plan (subsequently updated after the submission in July 29 2025), and the County of Wellington Official Plan (subsequently updated after the submission in November 2025). Each of the GIS mapping and Grand River Source Protection Plan provided relevant disclaimers for use of the mapping. In light of these disclaimers that note that the mapping referenced by WSWP should not be relied upon without independently verifying the information, GHD reviewed the Official Plan. All of this is to indicate that GHD provided the response in good-faith.

GHD notes WSWP's comment that Source Protection Plans are amended prior to Official Plans and Zoning Bylaws and that the Grand River Source Protection Plan (July 29, 2025) illustrates that the Site is situated within a chloride/chloride & sodium issue contributing area (ICA) on Schedule AA: County of Wellington, Township of Puslinch, ICAs (Schedule AA of the SPP). Schedule AA of the SPP further notes that neither sodium nor chloride are identified issues for waste disposal significant drinking water threat policy categories. As such, this does not change GHD's assessment of potential threats posed by the Proposed Use.

Further, although the Site is neither in an ICA for nitrate nor for trichloroethene (TCE), nitrates and TCE are demonstrated to not be facility-related contaminants and there is no basis to justify that this will change in the future.

¹ GHD, 2025. Response to Source Water Protection – Hydro-Vac Truck Disposal Area Zoning Amendment: 6678 County Road 34, Puslinch Township. June 9.

Nevertheless, GHD has amended our original submission consistent with WSWP's comment, and it has been included as Attachment 2.

4. Closing

Should you have any questions, please contact the undersigned.

Regards,
GHD Limited



Dan Puddephatt, M.Sc., P.Ge. (Limited)
Hydrogeology Practice Leader

+1 519 340-3741
dan.puddephatt@ghd.com

Copy to: Fred Taylor, GHD

Attachment 1

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A-500-3223236868

Version: 1.0

Issue Date: October 11, 2024

Pursuant to section 20.3 of the Environmental Protection Act, Revised Statutes of Ontario (R.S.O.) 1990, c. E. 19 and subject to all other applicable Acts or regulations this Environmental Compliance Approval is issued to:

2374868 ONTARIO INC.

6678 WELLINGTON RD 34 ROAD
CAMBRIDGE ONTARIO
N3C 2V4

For the following site:

6678 Wellington Road 34

Town of Puslinch, County of Wellington

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

- One (1) Diesel-fired engine, rated at 50 kilowatts and serving the screening operations;
- Fugitive emissions resulting from the delivery, storage, transfer and stockpiling of materials associated with waste processing operations;

all in accordance with the Application for Approval (Air & Noise) submitted by 2374868 Ontario Inc., dated April 13, 2023 and signed by Eric Nafziger - Site Manager; the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by GHD Limited, dated December 10, 2021 and signed by Erik Martinez; the Acoustic Assessment Report submitted by GHD Limited, dated April 3, 2024 and signed by Patrick Chen; the additional information provided by Patrick Chen of GHD Limited in the emails dated April 3, 2024, April 12, 2024, May 27, 2024 and July 15, 2024; and, all other documentation associated with the Application.

DEFINITIONS

For the purpose of this environmental compliance approval, the following definitions apply:

1. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility. "Acoustic Assessment Report" also means the Acoustic Assessment Report prepared by GHD Limited, dated April 3, 2024 and signed by Patrick Chen;
2. "Acoustic Audit" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the Facility, assessed to determine compliance with the performance limits for the Facility regarding noise emissions, completed in accordance with the procedures set in Publication NPC-103 and reported in accordance with Publication NPC-233;
3. "Acoustic Audit Report" means a report presenting the results of an Acoustic Audit, prepared in accordance with

Publication NPC-233;

4. "Acoustical Consultant" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with Ministry noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a Facility;
5. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
6. "Best Management Practices Plan" means a document or a set of documents which describe measures to minimize dust emissions from the Facility and/or Equipment;
7. "Company" means 2374868 Ontario Inc. that is responsible for the construction or operation of the Facility and includes any successors and assigns in accordance with section 19 of the EPA;
8. "Director" means a person appointed for the purpose of section 20.3 of the EPA by the Minister pursuant to section 5 of the EPA;
9. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
10. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
11. "Equipment" means the equipment and processes described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
12. "Facility" means the entire operation located on the property where the Equipment is located;
13. "Independent Acoustical Consultant" means an Acoustical Consultant who is not representing the Company and was not involved in preparing the Acoustic Assessment Report or the design/implementation of Noise Control Measures for the Facility and/or Equipment. The Independent Acoustical Consultant shall not be retained by the Acoustical Consultant involved in the noise impact assessment or the design/implementation of Noise Control Measures for the Facility and/or Equipment;
14. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
15. "Minister" means the Minister of the Environment, Conservation and Parks or such other member of the Executive Council as may be assigned the administration of the EPA under the Executive Council Act;
16. "Ministry" means the ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf;
17. "Noise Control Measures" means measures to reduce the noise emissions from the Facility and/or Equipment including, but not limited to, silencers, acoustic louvers, enclosures, absorptive treatment, plenums and barriers;
18. "Point of Reception" means Point of Reception as defined by Publication NPC-300;
19. "Publication NPC-103" means the Ministry Publication NPC-103 of the Model Municipal Noise Control By-Law, Final Report, August 1978, published by the Ministry as amended;
20. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
21. "Publication NPC-300" means the Ministry Publication NPC-300, "Environmental Noise Guideline, Stationary and Transportation Sources - Approval and Planning, Publication NPC-300", August 2013, as amended;
22. "Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources" means the Ministry publication "Technical Bulletin: management approaches for industrial fugitive dust sources", March 8, 2017, as amended;
23. "Truck(s)" means heavy truck(s).

TERMS AND CONDITIONS

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

1. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall:
 - a. prepare, not later than three (3) months after the date of this Approval, and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including:
 - i. routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the Equipment suppliers;
 - ii. emergency procedures, including spill clean-up procedures;
 - iii. procedures for any record keeping activities relating to operation and maintenance of the Equipment; and,
 - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources;
 - b. implement the recommendations of the Manual.

2. FUGITIVE DUST CONTROL

1. The Company shall develop in consultation with the District Manager, a Best Management Practices Plan for the control of fugitive dust emissions. This Best Management Practices Plan shall:
 - a. at minimum, be prepared in accordance with Ministry Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources; and
 - b. include a list of all Ministry comments received, if any, on the development of the Best Management Practices Plan, and a description of how each Ministry comment was addressed in the Best Management Practices Plan.
2. The Company shall submit the Best Management Practices Plan to the District Manager not later than three (3) months after the date of this Approval or as otherwise indicated by the District Manager.
3. Upon acceptance of the Best Management Practices Plan by the District Manager, the Company shall immediately implement the Best Management Practices Plan for the control of fugitive dust emissions to provide effective dust suppression measures to any potential sources of fugitive dust emissions resulting from the operation of the Facility.
4. The Company shall update the Best Management Practices Plan as necessary or at the direction of the District Manager.

3. RECORD RETENTION

1. The Company shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this Approval, and make these records available for review by staff of the Ministry upon request. The Company shall retain:
 - a. all records on the maintenance, repair and inspection of the Equipment; and
 - b. all records of any environmental complaints, including:
 - i. a description, time and date of each incident to which the complaint relates;
 - ii. wind direction at the time of the incident to which the complaint relates; and

- iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

4. NOTIFICATION OF COMPLAINTS

1. The Company shall notify the District Manager, in writing, of each environmental complaint within two (2) business days of the complaint. The notification shall include:
 - a. a description of the nature of the complaint; and
 - b. the time and date of the incident to which the complaint relates.

5. NOISE

1. The Company shall:
 - a. at all times, ensure that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300;
 - b. maintain the locations of the Equipment, buildings, 3 metre high embankment, and Truck routes as depicted in Figure 1 of the Acoustic Assessment Report at all times that the Facility is operating;
 - c. ensure that the sound emission levels of the Equipment shall not exceed the values specified in Table 1 of the Acoustic Assessment Report;
 - d. limit Truck arrivals and departures during the day-time hours of 7 a.m. to 7 p.m. in accordance with the following:
 - i. a maximum of six (6) heavy truck movements per sixty (60) minute period on truck route "TR1" as depicted in Figure 1 of the Acoustic Assessment Report;
 - ii. a maximum of five (5) heavy truck movements per sixty (60) minute period on truck route "TR2" as depicted in Figure 1 of the Acoustic Assessment Report;
 - e. limit Truck arrivals and departures during the evening-time hours of 7 p.m. to 11 p.m. in accordance with the following:
 - i. a maximum of two (2) heavy truck movements per sixty (60) minute period on truck route "TR1" as depicted in Figure 1 of the Acoustic Assessment Report;
 - ii. a maximum of five (5) heavy truck movements per sixty (60) minute period on truck route "TR2" as depicted in Figure 1 of the Acoustic Assessment Report;
 - f. limit Truck arrivals and departures during the night-time hours of 11 p.m. to 7 a.m. in accordance with the following:
 - i. a maximum of two (2) heavy truck movements per sixty (60) minute period on truck route "TR1" as depicted in Figure 1 of the Acoustic Assessment Report; and
 - ii. a maximum of five (5) heavy truck movements per sixty (60) minute period on truck route "TR2" as depicted in Figure 1 of the Acoustic Assessment Report.
2. The Company shall restrict the operation of the screening Equipment to the day-time hours of 7 a.m. to 7 p.m.

6. CHANGE OF OWNERSHIP

1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any of the following changes to the Facility operations:
 - a. the ownership of the Facility;
 - b. the operator of the Facility;

- c. the address of the Company;
- d. the partners, where the Company is or at any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c. B.17, shall be included in the notification; or
- e. the name of the corporation where the Company is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C.39, shall be included in the notification.

2. In the event of any change in ownership of the Facility, the Company shall notify the successor of the existence of this Approval and provide the successor with a copy of this Approval, and the Company shall provide a copy of the notification to the District Manager and the Director.

7. ACOUSTIC AUDIT

1. The Company shall carry out Acoustic Audit measurements on the actual noise emissions due to the operation of the Facility. The Company:

- a. shall carry out Acoustic Audit measurements in accordance with the procedures in Publication NPC-103 at a time when foliage attenuation is at a minimum between the Facility and the Points of Reception;
- b. shall submit an Acoustic Audit Report on the results of the Acoustic Audit, prepared by an Independent Acoustical Consultant, in accordance with the requirements of Publication NPC-233, to the District Manager and the Director, not later than six (6) months after the commencement of operation of the Facility. The Acoustic Audit shall include verification of the sound emission levels of the Equipment and the sound level limits of the Points of Reception; and
- c. shall submit, in conjunction with an Acoustic Audit Report, an Environmental Compliance Approval application requesting an amendment to the Approval to rescind the requirement for an Acoustic Audit Report as per Condition 7.1.b of this Approval.

2. The Director:

- a. may not accept the results of the Acoustic Audit if the requirements of Publication NPC-233 were not followed; and
- b. may require the Company to repeat the Acoustic Audit if the results of the Acoustic Audit are found unacceptable to the Director.

REASONS

The reasons for the imposition of these terms and conditions are as follows:

1. Condition Nos. 1 and 2 are included to emphasize that the Equipment must be maintained and operated according to a procedure that will result in compliance with the EPA, the Regulations and this Approval.
2. Condition No. 3 is included to require the Company to keep records and to provide information to staff of the Ministry so that compliance with the EPA, the Regulations and this Approval can be verified.
3. Condition No. 4 is included to require the Company to notify staff of the Ministry so as to assist the Ministry with the review of the site's compliance.
4. Condition No. 5.1 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.
5. Condition No. 5.2 is included to ensure that operation of the screening Equipment is not extended beyond the stated hours to prevent an adverse effect resulting from the operation of the Equipment.
6. Condition No. 6 is included to require the Company to notify/report to the Ministry so that compliance with the EPA, the

regulations and this Approval can be verified.

7. Condition No. 7 is included to require the Company to gather accurate information and submit an Acoustic Audit Report in accordance with procedures set in the Ministry's noise guidelines, so that the environmental impact and subsequent compliance with this Approval can be verified.

APPEAL PROVISIONS

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal, within 15 days after the service of this notice, require a hearing by the Tribunal. You must also provide notice to, the Minister of the Environment, Conservation and Parks in accordance with Section 47 of the *Environmental Bill of Rights, 1993* who will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- I. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- II. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

- I. The name of the appellant;
- II. The address of the appellant;
- III. The environmental compliance approval number;
- IV. The date of the environmental compliance approval;
- V. The name of the Director, and;
- VI. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar* Ontario Land Tribunal 655 Bay Street, Suite 1500 Toronto, Ontario M5G 1E5 OLT.Registrar@ontario.ca	and	The Minister of the Environment, Conservation and Parks 777 Bay Street, 5th Floor Toronto, Ontario M7A 2J3	and	The Director appointed for the purposes of Part II.1 of the <i>Environmental Protection Act</i> Ministry of the Environment, Conservation and Parks 135 St. Clair Avenue West, 1st Floor Toronto, Ontario M4V 1P5
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*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights, 1993*, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at ero.ontario.ca, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

Dated at Toronto this 11th day of October, 2024



Nancy Orpana

Director

appointed for the purposes of Part II.1 of the Environmental Protection Act

c: Eric Nafziger

Mike Masschaele, GHD Limited

Erik Martinez, GHD Limited

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A-500-4277838045

Version: 1.0

Issue Date: October 10, 2024

Pursuant to section 20.3 of the Environmental Protection Act, Revised Statutes of Ontario (R.S.O.) 1990, c. E. 19 and subject to all other applicable Acts or regulations this Environmental Compliance Approval is issued to:

2374868 ONTARIO INC.

6678 WELLINGTON RD 34 ROAD
CAMBRIDGE ONTARIO
N3C 2V4

For the following site:

6678 Wellington Road 34

Town of Puslinch, County of Wellington

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

a waste disposal site

to be used for the processing of the following types of waste:

excess soil, including liquid soil

DEFINITIONS

For the purpose of this environmental compliance approval, the following definitions apply:

1. "Approval" means this entire provisional Environmental Compliance Approval document, issued in accordance with Part II.1 of the EPA, and includes any schedules to it, the application and the supporting documentation listed in Schedule 1, as amended from time to time;
2. "Design and Operations Report" means the document describing all on-site operations, procedures and environmental protection measures, further described in the conditions of this Approval;
3. "Director" means any Ministry employee appointed in writing by the Minister pursuant to section 5 of the EPA as a Director for the purposes of Part V of the EPA;
4. "District Manager" means the District Manager of the local district office of the Ministry in which the Site is geographically located;
5. "EPA" means Environmental Protection Act, R.S.O. 1990, c. E.19, as amended;
6. "Monitoring Plan" means the groundwater and surface water monitoring plan described in Section 6 in Item 3 in Schedule 1;
7. "Minister" means the Minister of the Environment, Conservation and Parks, or such other member of the Executive Council, as may be assigned the administration of the EPA and OWRA under the Executive Council Act, R.S.O. 1990 c. E.25;

8. "Ministry" means the ministry of the Minister;
9. "Operator" means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the Site, and includes its successors or assigns;
10. "Owner" means any person that is responsible for the establishment or operation of the Site being approved by this Approval, and includes 2374868 Ontario Inc., its successors and assigns;
11. "OWRA" means the Ontario Water Resources Act, R.S.O. 1990, c. O.40, as amended;
12. "PA" means the Pesticides Act, R.S.O. 1990, c. P.11, as amended;
13. "Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to section 5 of the OWRA or section 5 of the EPA or section 17 of PA;
14. "Regional Director" means the Regional Director of the local regional office of the Ministry in which the Site is located;
15. "Reg. 347" means R.R.O. 1990, Regulation 347: General - Waste Management, made under the EPA, as amended from time to time;
16. "Site" means the facility located at 6678 Wellington Road 34, Cambridge, Ontario, authorized by this Approval;
17. "Soil Rules" means the Ministry's "Rules for Soil Management and Excess Soil Quality Standards" document;
18. "Trained Personnel" means persons knowledgeable in the following through instruction and/or practice:
 - a. relevant waste management legislation, regulations and guidelines;
 - b. major environmental concerns pertaining to the material being handled;
 - c. occupational health and safety concerns pertaining to the processes and materials being handled;
 - d. site management procedures, including the use and operation of the equipment that person is required to operate for the processes and materials being handled by that person;
 - e. emergency response procedures;
 - f. specific written procedures for the control of nuisance conditions;
 - g. specific written procedures for management of unacceptable loads;
 - h. the requirements of this Approval.

TERMS AND CONDITIONS

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

1. The Owner and Operator shall ensure compliance with all the conditions of this Approval and shall ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
2. Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this Approval.
3.
 1. Except as otherwise provided by this Approval, the Site shall be designed, developed, built, operated and maintained in accordance with the application for this Approval, dated March 27, 2024, and the supporting documentation listed in Schedule 1.

2.
 1. Construction and installation of the aspects of the Site described in the application for this Approval must be completed within 5 years of the later of:
 1. the date this Approval is issued; or
 2. if there is a hearing or other litigation in respect of the issuance of this Approval, the date that this hearing or litigation is disposed of, including all appeals.
 2. This Approval ceases to apply in respect of the aspects of the Site noted above that have not been constructed or installed before the later of the dates identified in Condition 3.2.1 above.
4. Where there is a conflict between a provision of any document, including the application, referred to in this Approval, and the conditions of this Approval, the conditions in this Approval shall take precedence.
5. Where there is a conflict between the application and a provision in any documents listed in Schedule 1, the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
6. Where there is a conflict between any two documents listed in Schedule 1, other than the application, the document bearing the most recent date shall take precedence.
7. The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected thereby.
8. The issuance of, and compliance with the conditions of, this Approval does not:
 1. relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement, including municipal by-laws relating to zoning or site plan approval; or
 2. limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner and Operator to furnish any further information related to compliance with this Approval.
9. The Owner and Operator shall take steps to minimize and ameliorate any adverse effect (as defined in the EPA) or impairment of air quality or water quality resulting from operations at the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.
10. Despite an Owner, Operator or any other person fulfilling any obligations imposed by this Approval the person remains responsible for any contravention of any other condition of this Approval or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the adverse effect (as defined in the EPA) or impairment of water quality.
11. The Owner shall notify the Director in writing, and forward a copy of the notification to the District Manager, within 30 days of the occurrence of any of the following changes:
 1. the ownership of the Site
 2. the Owner or Operator of the Site;
 3. the name or address of the Owner or Operator;
 4. the partners, where the Owner or Operator is or at any time becomes a partnership and a copy of the most recent declaration filed under the Partnerships Act, R.S.O. 1990, c. P.5 shall be included in the notification; or
 5. the directors, where the Owner of the Operator is or at any time becomes a corporation, and a copy of the most current information filed as required by the Corporations Information Act, R.S.O. 1990, c. C.39 shall be included in the notification.
12. No portion of this Site shall be transferred or encumbered prior to or after closing of the Site unless the Director is notified in advance and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will

be carried out.

13. No person shall hinder or obstruct a Provincial Officer in the performance of their duties, including any and all inspections authorized by the OWRA, the EPA or the PA of any place to which this Approval relates, and without limiting the foregoing to:
 1. enter upon the premises where the Site is located, or the location where the records required by the conditions of this Approval are kept;
 2. have access to, inspect, and copy any records required by the conditions of this Approval;
 3. inspect the practices, procedures, or operations required by the terms and conditions of this Approval; and
 4. sample and monitor for the purposes of assessing compliance with the conditions of this Approval or the EPA, the OWRA or the PA.
14. No later than 20 days from the date of issuance of this Approval, the Owner shall submit financial assurance as defined in Section 131 of the EPA to the Director in the amount of \$119,505. This financial assurance shall be in a form and amount acceptable to the Director and shall provide sufficient funds to pay for compliance with and performance of any action specified in this Approval, including Site clean-up, monitoring and the disposal of all quantities of waste on-site, closure and post-closure care of the Site and contingency plans for the Site.
15. Commencing on March 31, 2029, and every 5 years thereafter, the Owner shall provide to the Director a re-evaluation of the amount of the financial assurance required to facilitate the actions described under condition 14 above. Additional financial assurance, if required, must be submitted to the Director within 20 days of written acceptance of the re-evaluation by the Director.
16. The amount of financial assurance is subject to review at any time by the Director and may be amended at his/her discretion. If any financial assurance is scheduled to expire or notice is received, indicating financial assurance will not be renewed, and satisfactory methods have not been made to replace the financial assurance at least 60 days before the financial assurance terminates, the financial assurance shall forthwith be replaced by cash.
17. Any information requested by the Ministry concerning the Site and its operation under this Approval, including, but not limited to, any records required to be kept by this Approval, shall be provided in a timely manner to the Ministry, upon request. Records shall be retained for 7 years unless otherwise authorized in writing by the Director.
18. The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this Approval or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:
 1. an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this Approval or any statute, regulation or other legal requirement; or
 2. acceptance by the Ministry of the information's completeness or accuracy.
19.
 1. The receipt, unloading, loading and transfer of waste and other waste-derived materials may be carried out at the Site between the hours of 7:00am and 6:00pm, Monday through Friday, unless otherwise restricted by municipal by-laws.
 2. Waste may be processed and managed at the Site 24 hours per day, 7 days per week, unless otherwise restricted by municipal by-laws.
20. Only waste generated in the province of Ontario shall be accepted at the Site.
21. No waste other than non-hazardous excess soil that is liquid shall be accepted at the Site.
22. The Site is approved for the following waste management activities:
 1. The receipt, temporary storage, and transfer of excess soil that is liquid, and the temporary storage, testing and

transfer of dry processed soil, process water and other process derivatives.

2. The processing of excess soil that is liquid soil using the equipment and methods described in Item 1 of Schedule 1, including the passive dewatering of excess soil that is liquid using lined swales and ponds.
 3. The temporary storage of process water in lined swales and ponds prior to testing and discharge.
- 23.
1. The amount of waste received at the Site shall not exceed 125 tonnes per day.
 2. The amount of waste and waste-derived materials present at the Site at any one time shall not exceed the following:
 1. 440 cubic metres of liquid waste, including excess soil that is liquid and process water, contained in lined swales and ponds on-site; and
 2. 525 tonnes of all other waste, including dry processed soil and process derivatives.
 3. The Owner shall refuse any load if the receipt of that load could reasonably be expected to cause non-compliance with this Approval, including the receipt and storage limitations set out above.
- 24.
1.
 1. Trained Personnel shall supervise all shipments of waste received at the Site. Prior to any shipment being unloaded, Trained Personnel shall review the accompanying information for that shipment, and examine the contents of the truck where possible, to ensure the waste matches the description provided and that the waste is permitted to be received further to the conditions of this Approval. If any shipment is suspected of containing unapproved waste, that shipment shall be refused and shall not be unloaded at the Site.
 2. Trained Personnel shall examine all shipments of waste while they are being unloaded. If at any time a shipment is discovered to contain unapproved material, the shipment shall be refused and all portions of the shipment that can be recovered shall be removed from the Site.
 2. In the event that a shipment of waste is rejected from the Site, the Owner shall forthwith notify the District Office of the following in writing:
 1. the name of the company that brought the rejected load to the Site;
 2. the license plate number of the vehicle that brought the rejected load to the Site;
 3. a description of the rejected waste and the reason for rejecting the shipment;
 4. the destination of the rejected waste if the driver provides that information.
 3. All liquid soil shall be unloaded directly into the designated soil management area in a manner that prevents spills during transfer.
 4. The Owner shall ensure that:
 1. no process water is discharged directly to a storm sewer, to any waterbody or any other part of the natural environment, or otherwise in a manner that requires approval under Section 53 of the OWRA, unless such an approval is in effect for the Site; and
 2. all process water is otherwise managed in accordance with applicable municipal, provincial and federal requirements, which may include discharge to sanitary sewer as permitted by the local municipality or disposal of the process water off-site in a facility permitted to receive such material.
 5. Notwithstanding Condition 24.4 above, process water may be infiltrated at the Site provided the waste is tested prior to discharge in accordance with the Monitoring Plan.
 6. Dry excess soil recovered from processing of excess soil that is liquid may be stored outdoors in stockpiles in designated areas on an impermeable surface, with any contact water generated to be directed to the on-site drainage swale.

7. The Owner shall ensure that the management of dry excess soil is carried out in a manner that minimizes impacts from wind-blown dust.
 8. Dry excess soils that have been tested shall remain segregated from all other soils on-site.
25. No processed soil shall leave the Site for reuse unless it has been sampled, analysed and managed in accordance with the following:
1. The Owner shall ensure that soil sampling, analysis and the number of samples collected for each stockpile is in accordance with Table 2 of Schedule E in Ontario Regulation 153/04.
 2.
 1. The Owner shall ensure that discrete samples are taken and analysed for:
 1. metals;
 2. hydride-forming metals;
 3. petroleum hydrocarbons (PHCs);
 4. benzene, toluene, ethylbenzene, xylene (BTEX);
 5. volatile organic compounds (VOCs);
 6. polycyclic aromatic hydrocarbons (PAHs);
 7. acid/base/neutral compounds (ABNs);
 8. chlorophenols (CPs).
 2. The Owner shall ensure that each processed soil load leaving the Site is tested in accordance with Schedule 9 in Reg. 347 ("slump test") to ensure the processed soil is solid.
 3. The Owner shall ensure that any additional sampling and analysis specific to the receiving site shall be carried out as required by the local municipality, the local conservation authority and any applicable federal/provincial legislation.
 4. Should the receiving site be subject to the requirements set out in O. Regulation 153/04, the Owner shall ensure that any additional sampling and analysis specific to the receiving site shall be carried out as recommended by the Qualified Person for the receiving site.
 3.
 1. When determining bulk concentrations of contaminants in the processed soil to verify compliance with the Soil Standards, the testing shall be in compliance with the "Protocol for Analytical Methods Used in the Assessment of Properties under Part XV.1 of the Environmental Protection Act", dated July 1, 2011, as amended and in accordance with the industry standards.
 2. The Owner shall submit the samples to an accredited laboratory for the required analysis. All samples shall be handled in accordance with the instructions of the accredited laboratory carrying out the analytical testing.
 4. Processed soil to be sent off-site for beneficial reuse as described Section 5(1)3 in Ontario Regulation 406/19 shall only be sent off-site for reuse in accordance with Section 3 of Ontario Regulation 406/19 and the Soil Rules. All other processed soil shall only be transferred off-site to a waste disposal site that is approved to accept that type of material in accordance with the Environmental Compliance Approval for that site, or to a location not required to obtain an Environmental Compliance Approval to manage that material.
 5. Rock (having a same meaning as in Ontario Regulation 406/19) that does not meet the definition of inert fill set out in Reg. 347 shall only be transferred off-site to a waste disposal site that is approved to accept that type of material in accordance with the Environmental Compliance Approval for that site, or to a location not required to obtain an Environmental Compliance Approval to manage that material.
26. A sign shall be posted and maintained at the entrance to the Site in a manner that is clear and legible, and shall include

the following information:

1. the name of the Site and Owner;
2. this Approval number;
3. the name of the Operator;
4. the normal hours of operation as described in Condition 19 above;
5. the allowed materials that may be accepted at the Site, and any materials explicitly prohibited by conditions of this Approval;
6. a telephone number to which complaints may be directed; and
7. a twenty-four (24) hour emergency telephone number (if different from above).

27. The Site shall be operated and maintained in a secure manner, such that unauthorized persons cannot enter the Site.

28. 1. The Owner shall:

1. construct liners under all soil storage areas and under all process water collection/storage and conveyance pathways on-site no later than 90 days from the date of issuance of this Approval in order to prevent uncontrolled infiltration of process water or contact water at the Site;
2. submit as-built drawings showing construction details for the above-noted liners to the Director no later than 120 days from the date of issuance of this Approval;
3. maintain the above-noted liners in good condition at all times.

2. The Owner shall ensure that the Site is monitored in accordance with the Monitoring Plan noted in Item 3 in Schedule 1, including:

1. sampling of the groundwater wells MW01-20, MW02-20, MW03-20, MW4-23, MW5-23, BH213, BH214, BH219 and the two on-site water supply wells AGW1, APW1 on a quarterly basis with samples to be analyzed for metals, VOCs, PHCF1-F4, SVOCs, and PAHs;
2. sampling of the stormwater management pond on a weekly basis with samples to be analyzed for metals, VOCs, PHCF1-F4, SVOCs, and PAHs;
3. measurement of the static groundwater levels at the eight groundwater monitoring wells (excluding supply wells) quarterly during the groundwater sampling events.

3. All samples shall be submitted to a Canadian Association for Laboratory Accreditation (CALA) accredited laboratory for analysis.

4. Each surface water sample shall be compared against the limits set out in Table 2: Full Depth Generic Site Condition Standards in a Potable Ground Water Condition for Coarse Textured Soils, as provided in 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.

5. Process water shall be stored in the on-site temporary holding pond until it has been tested. Process water that does not meet Table 2 Standards as noted above shall not be released into the natural environment, but shall be removed from the Site for treatment or disposal at an approved facility.

6. The Owner shall prepare and submit to the District Manager a groundwater monitoring report, on an annual basis, within 90 days following the end of each operational season. The first report shall cover the first annual period following the date of issuance of this Approval, with subsequent reports covering successive annual periods thereafter.

7. The annual groundwater report shall be prepared in accordance with the following:

1. The report shall be prepared by a qualified person who is a professional geoscientist (P. Geo.) and/or a registered professional engineer (P. Eng.) with relevant hydrogeological expertise.
2. The report shall contain a summary and interpretation of the groundwater monitoring data, and shall include an assessment of the following:
 1. groundwater flow direction;
 2. groundwater quality analytical results;
 3. a statement as to the adequacy of the groundwater monitoring program;
 4. a statement as to the adequacy of the parameters of concern, trigger threshold values and contingency measures under the Groundwater Trigger Mechanism and Contingency Plan as recognized in this Approval.
3. The report shall include a statement from the qualified person on the effectiveness of any engineered controls and associated operational practices in place to mitigate environmental impacts.
4. The report shall include a statement from the qualified person on whether the Reasonable Use Guideline has been met at the property boundary in accordance with the Ministry document entitled "Guideline B-7, Incorporation of the Reasonable Use Concept into Groundwater Management" dated 1994.
5. No modification shall be made to the groundwater monitoring program unless permitted through an amendment to this Approval.
8. The Owner shall adopt the preliminary Trigger Response Plan for the groundwater monitoring program as described in Item 2 in Schedule 1.
9. Within 30 days of collecting 2 years of groundwater monitoring data, and no more than 25 months from the date of issuance of this Approval, the Owner shall submit to the District Manager a Groundwater Trigger Mechanism and Contingency Plan that is protective of drinking water. The groundwater parameters of concern shall be determined after collecting 2 years of groundwater quality data in accordance with the groundwater monitoring program described in this Approval. This document shall be prepared by a qualified person who is a registered professional geoscientist (P. Geo.) and/or a registered professional engineer (P. Eng.) with relevant hydrogeological expertise, and shall be prepared in accordance with the following:
 1. The document shall include a proposal for site-specific groundwater trigger threshold values for parameters of concern in accordance with the Ministry's Guideline B-7 document noted above.
 2. The document shall include proposed trigger mechanisms and contingency measures for the Site.
 3. Once approved by the District Manager, trigger threshold values, trigger mechanisms and contingency measures shall be incorporated into the groundwater monitoring plan for the Site.
 4. No modifications shall be made to the Groundwater Trigger Mechanism and Contingency Plan unless permitted through an amendment to this Approval.
10. No later than 90 days from the date of issuance of this Approval, the Owner shall prepare a Spill Prevention and Contingency Plan for that Site that describes the infrastructure and procedures that will be in place at the Site to prevent spills and all contingency measures to be employed in the event of a spill at the Site.
11. No later than 90 days from the date of issuance of this Approval, the Owner shall prepare a plan to prevent impacts to groundwater from the storage and use of winter maintenance materials including salt.
12. The Owner shall ensure that any water taking is only carried out in accordance with a Permit to Take Water where such a permit is required.
29. The Owner shall maintain a training plan to be used to train all employees that operate the Site.
30. The Owner shall ensure that Trained Personnel are available at all times during the hours of operation of this Site, and that Trained Personnel supervise all management of excess soils that are liquid, processed soils, and process water and

other process derivatives at the Site.

31. An inspection of the entire Site and all equipment on-site shall be conducted each day the Site is in operation to ensure that: the Site is secure; that the operation of the Site is not causing any nuisances; that the operation of the Site is not causing any adverse effects on the environment; and that the Site is being operated in compliance with this Approval. Any deficiencies discovered as a result of the inspection shall be remedied immediately or as soon as practicable, which may require temporarily ceasing operations at the Site if needed.
32. A record of the inspections, including the following information, shall be kept in the daily log book:
 1. the name and signature of person that conducted the inspection;
 2. the date and time of the inspection;
 3. a list of any deficiencies discovered;
 4. any recommendations for remedial action; and
 5. the date, time and description of actions taken.
33. The Site shall be operated and maintained such that vermin, vectors, dust, litter, odour and noise do not create a nuisance.
34. If at any time the Owner receives a complaint regarding an adverse effect (as defined in the EPA) due to operation of the Site, the Owner shall respond to the complaint according to the following procedure:
 1. The Owner shall record and number each complaint, either electronically or in a separate log book, along with the following information:
 1. the nature of the complaint;
 2. the name, address and telephone number of the complainant (if provided);
 3. the date and time the complaint was received;
 4. a description of the weather conditions at the time of the complaint;
 5. a description of the liquid soils, processed soils and process water handling activities taking place at the time of the complaint; and
 6. a description of the known or suspected activity causing the complaint.
 2. The Owner shall:
 1. initiate appropriate steps to determine all possible causes of the complaint;
 2. proceed to take the necessary actions to eliminate the cause of the complaint;
 3. notify the District Manager of the complaint within 24 hours of receiving the complaint;
 4. forward a written response to the District Manager within 5 business days of receiving the complaint, with a copy to the complainant if they have identified themselves, that describes the actions taken to address the complaint; and
 5. forward daily updates to the District Manager, if requested, until the complaint is resolved.
 3. The Owner shall complete and retain on-site a report written within 10 business days of the complaint date, including:
 1. the information required in conditions 34.1 and 34.2.4 above;
 2. a list of the actions taken to resolve the complaint; and

3. recommendations for any remedial measures, managerial changes or operational changes that would reasonably avoid the recurrence of similar incidents in the future.

35. The Owner shall prepare and provide a copy of an emergency response plan to the Fire Department within 30 days of the issuance of this Approval.

36. The emergency response plan shall be kept up to date, and a copy shall be retained and accessible to all staff at all times.

37. The equipment, materials and personnel requirements outlined in the emergency response plan shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.

38. Each staff member that operates the Site shall be fully trained in the use of the equipment they are required to operate under the emergency response plan and in the procedures to be employed in the event of an emergency.

39. The Owner shall immediately take all measures necessary to contain and clean up any spill (as defined in the EPA) which may result from the operation of this Site and immediately implement the emergency response plan if required.

40. A Closure Plan shall be submitted to the Director for approval, with a copy to the District Manager, no later than six (6) months before the planned closure date of the Site. The Closure Plan shall include, at a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for completion of that work.

41. Upon closure, the Site shall be closed in accordance with the approved Closure Plan.

42. No more than 10 days after closure of the Site, the Owner shall notify the Director, in writing, that the Site is closed and that the approved Closure Plan has been implemented.

43. A daily log shall be maintained at the Site, either electronically or in written format, and shall include the following information as a minimum:

1. the date;

2. quantities and sources of all waste received at the Site;

3. estimated quantities of all stockpiled soil on-site at the end of each operating day;

4. quantities and destinations of all waste and waste-derived materials shipped from the Site;

5. a record of all sampling and analysis carried out further to the conditions of this Approval;

6. a record of daily inspections required by this Approval;

7. a record of all maintenance or repair activities carried out on any impermeable liners, water storage or conveyance features, or other waste management infrastructure and equipment on-site;

8. a record of any process upsets or spills with the potential to enter the natural environment, the nature of the spill or process upset and the action taken for the clean up or correction of the spill, the time and date of the spill or process upset, and for spills, the time that the Ministry and other persons were notified of the spill in fulfilment of the reporting requirements in the EPA .

9. a record of any refusals, including the types and amounts of waste refused, reasons for refusal and actions taken;

10. a record of all complaints received regarding operations at the Site.

44. 1. By March 31, 2025, the Owner shall prepare a written report that covers the period from the date of issuance of this Approval until March 31, 2025 that shall be kept on-site and made available to any Provincial Officer upon request.

2. By March 31, 2026, and on an annual basis thereafter, the Owner shall prepare a written report for the previous

calendar year that shall be kept on-site and made available to any Provincial Officer upon request.

3. The report noted above shall include, at a minimum, the following information:
 1. a detailed monthly summary of the type and quantity of all incoming and outgoing liquid soils, processed soils, process water, rock and debris and the destination of all outgoing liquid soils, processed soils, process water, rock and debris along with a summary of all sampling and analysis for outgoing materials;
 2. the results of the sampling and analysis required under the Monitoring Plan;
 3. any environmental and operational problems, that could negatively impact the natural environment (as defined in the EPA), encountered during the operation of the Site and during the facility inspections and any mitigative actions taken;
 4. any changes to the emergency response plan or the Design and Operations Report since the last Annual Report;
 5. any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard.

REASONS

The reasons for the imposition of these terms and conditions are as follows:

1. 1. The reason for the definitions section is to simplify the wording of the subsequent conditions and define the specific meaning of terms as used in this Approval.
2. The reason for Conditions 1, 2, 4, 5, 6, 7, 8, 9, 10 and 13 is to clarify the legal rights and responsibilities of the Owner and Operator.
3. The reason for Condition 3 is to ensure that the Site is operated in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.
4. The reasons for Condition 11 are to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes.
5. The reasons for Condition 12 are to restrict potential transfer or encumbrance of the Site without the approval of the Director and to ensure that any transfer of encumbrance can be made only on the basis that it will not endanger compliance with this Approval.
6. The reason for Conditions 14, 15 and 16 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Owner is unable or unwilling to do so.
7. The reason for Conditions 17 and 18 is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA, OWRA and PA.
8. The reason for Condition 19 is to specify the hours of operation for the Site.

9. The reason for Condition 20 is to specify the approved service area from which waste may be accepted at the Site.
10. The reasons for Conditions 21, 22 and 23 are to specify the types of materials that may be accepted at the Site, the maximum amounts of waste that may be stored at the Site, the maximum rate at which the Site may receive and ship waste and the allowable methods of processing based on the Owner's application and supporting documentation.
11. The reason for Condition 24 is to ensure that all wastes received at the Site are properly identified and classified to ensure they are managed in a manner that protects the health and safety of people and the environment.
12. The reasons for Condition 25 is to ensure that all processed material is testing and to ensure that any processed material is only sent off-site for reuse to an appropriate receiving facility.
13. The reason for Condition 26 is to ensure that users of the Site are fully aware of important information and restrictions related to Site operations and access under this Approval.
14. The reason for Condition 27 is to ensure the controlled access and integrity of the Site by preventing unauthorized access when the Site is closed and no site attendant is on duty.
15. The reason for Conditions 28 and 33 is to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of people and the environment, and to ensure that the Site is monitored to prevent and address impacts groundwater.
16. The reason for Conditions 29 and 30 is to ensure that the Site is operated by properly Trained staff in a manner which does not result in a hazard or nuisance to people or the environment.
17. The reason for Conditions 31 and 32 is to ensure that inspections of all Site grounds and infrastructure are carried out on a regular basis, and that detailed records of Site inspections are recorded and maintained for compliance and information purposes.
18. The reason for Condition 34 is to ensure that any complaints regarding Site operations at the Site are responded to in a timely manner.
19. The reasons for Conditions 35, 36, 37, 38 and 39 is to ensure that an Emergency Response Plan is developed and maintained at the Site, and that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures.
20. The reason for Conditions 40, 41 and 42 is to ensure that the Site is closed in accordance with Ministry standards and to protect the health and safety of the public and the environment.
21. The reason for Condition 43 is to provide for the proper assessment of effectiveness and efficiency of site design and operation, their effect or relationship to any nuisance or environmental impacts, and the occurrence of any public complaints or concerns. Record keeping is necessary to determine compliance with this Approval, the EPA and its regulations.
22. The reason for Condition 44 is to ensure that regular review of site development, operations and monitoring data is documented and any possible improvements to site design, operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of

site design.

APPEAL PROVISIONS

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal, within 15 days after the service of this notice, require a hearing by the Tribunal. You must also provide notice to, the Minister of the Environment, Conservation and Parks in accordance with Section 47 of the *Environmental Bill of Rights, 1993* who will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- I. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- II. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

- I. The name of the appellant;
- II. The address of the appellant;
- III. The environmental compliance approval number;
- IV. The date of the environmental compliance approval;
- V. The name of the Director, and;
- VI. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar* Ontario Land Tribunal 655 Bay Street, Suite 1500 Toronto, Ontario M5G 1E5 OLT.Registrar@ontario.ca	and	The Minister of the Environment, Conservation and Parks 777 Bay Street, 5th Floor Toronto, Ontario M7A 2J3	and	The Director appointed for the purposes of Part II.1 of the <i>Environmental Protection Act</i> Ministry of the Environment, Conservation and Parks 135 St. Clair Avenue West, 1st Floor Toronto, Ontario M4V 1P5
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*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights, 1993*, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at ero.ontario.ca, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

Dated at Toronto this 10th day of October, 2024



Mohsen Keyvani

Director

appointed for the purposes of Part II.1 of the Environmental Protection Act

c: Eric Nafziger

The following schedules are a part of this environmental compliance approval:

SCHEDULE 1

This Schedule 1 includes a list of documents relied upon for review:

1. Environmental Compliance Approval received March 27, 2024 requesting approval of a liquid soil processing site, signed by Eric Nafziger, Site Manager, 2374868 Ontario Inc., including all supporting documentation.
2. Email dated June 25, 2024 from Dan Puddephatt, P.Geo., GHD, to Pamela Grande, P.Geo., MECP, including the attached letter dated June 25, 2024 from Dan Puddephatt, P.Geo., GHD to Pamela Grande, P.Geo., MECP detailing the proposed trigger response plan ("GHD, 2024a. Proposed Trigger Response Plan – Conestoga Badger Inc. June 25").
3. Email dated July 5, 2024 from Dan Puddephatt, P.Geo., GHD, to Pamela Grande, P.Geo., MECP, including the attached document entitled "Hydrogeological Impact Assessment Revision No.1" dated July 2, 2024 ("GHD, 2024b. Hydrogeological Impact Assessment Revision No. 1, 2374868 Ontario Inc., Badger Conestoga Inc. July 5").

Attachment 2

Our ref: 11210029-LTR-13

26 November 2025

Mr. Frank Ertl
2374868 Ontario Inc.
6678 Wellington Road 34
Cambridge, Ontario
N3C 2V4

**Revised: Response to Source Water Protection - Hydro-Vac Truck Disposal Area Zoning Amendment:
6678 County Road 34, Puslinch Township**

Dear Mr. Ertl

On behalf of 2374868 Ontario Inc., GHD Limited (GHD) has prepared this letter to provide revised responses to the Wellington Source Water Protection comments form/checklist with the Pre-Consultation Comments Summary. GHD has no technical disagreements with any of the designations listed on the form.

Additionally, although not required until submission of the Site Plan Application, as noted in the checklist, the following items also have already been completed by the Proponent:

Liquid Fuel Handling/Storage Spill Response Plan (>250L) (Provided in Design and Operations Report included in responses to Harden Environmental comments on the pre-consultation application)

Chemical/Waste Management Storage Spill Response Plan (Provided in Design and Operations Report included in responses to Harden Environmental comments on the pre-consultation application)

Hydrogeological Impact Assessment Report (Provided in responses to Harden Environmental comments on the pre-consultation application). As noted in the report no salt or other chemical substances are used at the Site for winter maintenance, so this also addresses the Winter Maintenance Plan requirement. Drinking Water Threats are fully addressed by the Report. The Report also includes evaluations of the Groundwater Monitoring Program that has been in place for over 10 years and is required by the MECP Waste ECA.

Section 3: Documentation required to be provided by the owner or their agents

	ZBA Application	Site Plan Application	Not Required
Appendix A: Contact & Proposal Information	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drinking Water Threats Disclosure Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Liquid Fuel Handling/Storage Spill Response Plan (>250L)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Winter Maintenance Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chemical/ Waste Management Storage Spill Response Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Hydrogeological Assessment Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Water Balance Assessment Report	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recharge Infiltration Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Flow Meter Installation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Groundwater Monitoring Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you have any questions regarding GHD's response to the Reviewer's comments, please feel free to contact the undersigned.

Regards,
GHD Limited

Fred Taylor
Principal
+1 519 340-4222
fred.taylor@ghd.com

Dan Puddephatt, M.Sc., P.Ge. (Limited)
Senior Hydrogeologist
+1 519 741-7919
dan.puddephatt@ghd.com

Encl

