

**D14-ONT – 6678 Wellington Rd 34 – 3<sup>rd</sup> Submission Comment Summary**

| <b>Consultant</b>              | <b>Comments</b>     |
|--------------------------------|---------------------|
| Harden Environmental           | See attached letter |
| Valcoustics – Noise Consultant | See attached letter |
| GEI                            | See attached letter |
| Source Water                   | See attached letter |
| Dougan Ecology                 | See attached letter |



Harden Environmental Services Ltd.  
4622 Nassagaweya-Puslinch Townline  
Moffat, Ontario, L0P 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 29, 2026

Township of Puslinch  
7404 Wellington Road 34  
Guelph, ON, N1H 6H9  
c/o Nethery Planning

Attention: Joe Nethery

Dear Joe;

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

We have reviewed the response from the applicant dated 9-April-2026 (GHD, 2025).

#### **Comment 1**

We provided the technical reason why we were commenting on the zoning not permitting the proposed disposal of slurry wastes. No additional comment necessary.

#### **Comment 2 a through 2d**

In responses 2,3,6 and 7 in the December 2025 GHD Letter there is no recognition that the geological setting for the proposed activity is inappropriate for the proposed release of liquid soil wastes. There is a complex deposit of unconsolidated sediments that make it difficult to track and identify contamination from this site. There are more appropriate geological and hydrogeological environments to accommodate this kind of activity.

The presence of PAH in groundwater is not a natural occurrence and should not be considered as background geochemistry of this area.

**Comment 3**

Responses 3 and 9 of the December 2025 letter do not address emerging chemicals of concern.

**Comment 4**

It is our opinion that the proposed activity does not restore or enhance groundwater resources. The proposed activity represents a threat to underlying groundwater quality and should not be permitted.

**Comment 5**

The proposed liners and monitoring program are a necessity because of the sensitive hydrogeological environment underlying the proposed activity. There are more suitable geological and hydrogeological environments for this activity that will not require liners, will have less environmental monitoring and do not pose a long-term threat to an important drinking water resource.

**Comment 6**

The responses 2,3,6 and 7 of the December 2025 GHD letter do not provide satisfaction that the proposed activity is appropriate for the hydrogeological setting at this site.

**Comment 7**

The presence of salt contamination is relevant evidence in regard to the susceptibility of the underlying aquifer.

**Comment 8**

The presence of chloride contamination in the groundwater within a couple of years of surface application confirms that some types of contaminants are not attenuated in the environment and rely on dilution within the aquifer to attenuate peak concentrations. We are recommending that the proposed activity not be allowed to subject the aquifer to any contamination whereby time and dilution are the solution to protecting the drinking water of existing and future residents.

**Comment 9**

We defer to Trace Environmental to comment on quality of soil to be moved to the ARA license.

**Comment 11**

The responses 2, 6 and 11 do not provide satisfaction that the proposed activity is appropriate for the hydrogeological setting at this site.

**Comment 12**

No additional comment.

Sincerely,

Harden Environmental Services Ltd.

[REDACTED]  
Stan Denhoed, P.Eng., M.Sc.  
Senior Hydrogeologist



May 8, 2026

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

Attention: Monika Farncombe  
[mfarncombe@puslinch.ca](mailto:mfarncombe@puslinch.ca)

**VIA E-MAIL**

**Re: Peer Review of Acoustic Assessment Report  
Waste Processing Facility  
Puslinch, Ontario  
VCL File: 122-0269**

Dear Ms. Farncombe:

We have completed our review of a letter dated April 8, 2026 responding to our peer review comments dated January 30, 2026. This letter contains an attachment containing a copy of the Environmental Compliance Approval (ECA) that has been issued for the facility.

There are no issues with the responses provided. GHD have updated the noise assessment using the suggestions provided in the peer review and have found that the guideline requirements are still being met. GHD will include the additional requested detail, results and sample calculations when the AAR is updated.

Based on our review of the response letter, the outstanding concerns have been addressed. Thus, we concur with the findings and conclusions of the noise study that the noise limits should be met at off-site sensitive receptors with the implementation of the recommended noise mitigation measures.

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

Yours truly,

**VALCOUSTICS CANADA LTD.**

Per:   
**John Emeljanow, P.Eng.**

JE\  
2026-05-08 Peer Review V5.0.docx

May 6, 2026

GEI Project No. 2402574 – 120006-017

VIA CLOUDPERMIT: Township of Puslinch  
Township Application No. D14-ONT

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

**Re: ZBA 3<sup>rd</sup> Submission**  
**6676-6678 Wellington Road 34**  
**Puslinch, ON**

Dear Ms. Farncombe:

GEI Consultants Canada Ltd. (GEI) have reviewed review third submission documents for a Zoning By-Law Amendment application in support of existing uses on the subject lands located at 6676-6678 Wellington Road 34 in the Township of Puslinch. The third submission was received on April 27, 2026.

It is our understanding that the 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.

Pre-submission comments for the temporary zoning by-law amendment were provided on February 13, 2025, and a pre-consultation meeting was held on February 27, 2025. Comments on the first Zoning By-Law Amendment application were provided on November 3, 2025. Comments on the second Zoning By-Law Amendment application were provided on February 4, 2026.

## **1. Documents Received**

The application is incomplete as all required plans or studies have not been received. Additional documents required are listed in Section 2.

The following documents were received and reviewed as part of this submission:

- 2<sup>nd</sup> Submission Response Letter, prepared by GSP Group, dated April 15, 2026.

We defer detailed review of the following documents to Township staff and other consultants:

- Response to Trace (Environmental), prepared by GHD, dated April 9, 2026.
- Response to Harden (Hydro-Vac Truck Disposal Area), prepared by GHD, dated April 9, 2026.
- Response to Valcoustics (Noise), prepared by GHD, dated April 8, 2026.
- Response to Ecology Technical Comments (Dougan), prepared by GHD, dated April 8, 2026.

## 2. Additional Documents Required

The following documents are required to support the temporary zoning bylaw amendment application:

- Updated Stormwater Management Report
- Civil engineering design drawings, including a Site Servicing and Grading Plan, and details for proposed stormwater/liquids soils management upgrades
- Letter or memo addressing how each condition and requirement of the Waste ECA will be met.

## 3. Technical Comments

Based on our previous comments and review of documents identified in Section 1, we provide the following technical comments. Please note that these comments are unchanged from our comments on the second submission, as updated documents and drawings were not received as part of the third submission.

### 3.1. Deficiencies/Outstanding Matters

The following comments must be addressed to support the application.

| No. | Matter                                                           | Document                     | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----|------------------------------------------------------------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.  | Stormwater Management Report and associated Engineering Drawings | Stormwater Management Report | <u>GEI Comment (August 18, 2025)</u><br>The 2021 Stormwater Management Report provided with this submission (dated February 9, 2021) is not consistent with the information provided in the Site Servicing Study (dated June 20, 2025), and does not discuss proposed upgrades, including the proposed temporary pond, and a low permeability liner system beneath the liquid soil unloading/processing area, the temporary pond, the drainage swale, and the final pond.<br><br>The 2021 Stormwater Management Report concludes that no new works or modifications to the site are proposed, but this is not currently correct. As such an updated Stormwater Management Report, with associated Site Servicing and Grading Plan and any necessary engineering details for the liner system and temporary pond, should be provided. |

| No. | Matter                       | Document                    | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----|------------------------------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                              |                             | <p>Please ensure that the Stormwater Management Report addresses both quantity and quality considerations related to both liquid soils runoff and stormwater runoff.</p> <p><u>GHD Response (December 17, 2025)</u><br/>The Stormwater Management Report will be updated to including engineering details of the proposed liner system and stormwater features once the zoning application is approved and we proceed to Site Plan Approval. The operations are currently paused pending zoning approval and the new water handling system and liner system have to be installed before the commencement of operations in accordance with the Waste ECA requirements.</p> <p>The conceptual extent of the liner system and the conceptual new water handling features are shown on Figure 1. Two liquid soil placement areas, 2 drainage swale and 2 holding ponds will be installed so that operations can continue pending the receipt of sampling results from one of the ponds as described in the Waste ECA and Design and Operations (D&amp;O) Report. Then that pond will be emptied and water in the second pond will be tested.</p> <p><u>GEI Comment (February 2, 2026 and May 6, 2026)</u><br/>Deferral of an updated stormwater management report and engineering drawings to site plan approval is not acceptable. Accurate, stamped engineering documents and drawings are required to support the temporary zoning bylaw amendment application. Statements in response letters and conceptual sketches are not sufficient.</p> |
| 2.  | Design and Operations Report | Design and Operation Report | <p><u>GEI Comment (November 3, 2025)</u><br/>The 2024 Design and Operations Report includes a 2022 Stormwater Management Report in Appendix D. Similar to Comment 1 above, the Stormwater Management Report should be updated to reflect the current proposed stormwater management/liquid soils management system, and the updated version should be included in the Design and Operations Report.</p> <p>In addition, the Design and Operations Report should be updated to address the conditions and requirements of the Waste ECA.</p> <p><u>GHD Response (December 17, 2025)</u><br/>See Response to Comment 1. The D&amp;O Report is required to be updated by the Waste ECA as Site and operational conditions change and will be updated as needed to reflect such changes. GHD notes that it is not typical for D&amp;O Reports to copy and include each ECA condition and requirement so that duplication and inconsistencies do not occur.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| No. | Matter | Document | Comment                                                                                                                                                                                                                                                                        |
|-----|--------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |        |          | <u>GEI Comment (February 2, 2026 and May 6, 2026)</u><br>If the D&O report is not the correct document for discussion of proposed compliance with conditions and requirements of the Waste ECA, please provide a separate letter or memo addressing these for Township review. |

### ***3.2. Completed/Approved Matters***

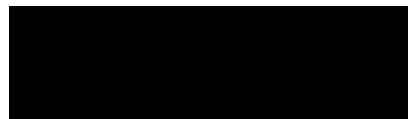
The following comments have been addressed.

| No. | Matter | Document | Comment |
|-----|--------|----------|---------|
|     |        |          |         |

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.  
Senior Project Engineer



05/05/2026

## Memorandum

To: Monika Farncombe – Planning and Corporate Services Coordinator, Township of Puslinch

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

Reviewed By: Kyle Davis – Risk Management Official, Township of Puslinch

**RE: 6676-6678 Wellington Road 34, Township of Puslinch  
Zoning By-Law Amendment - Submission 3**

Wellington Source Water Protection (WSWP) staff have had the opportunity to review the submitted documents in support of the above noted application. This property is located within a vulnerable area and our review was completed to ensure the activities at this property meet the requirements of relevant Source Protection Plan and County of Wellington Official Plan policies.

### *Clean Water Act Section 59 Notice & Risk Management Plan:*

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 August 19, 2025. Additional Notices are required for all future *Planning Act* and Building Permit applications.

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.

### *Land Use Planning:*

The Chemical Handling/Storage and Spills Response Plan as noted in the Design and Operations Report, dated March 26, 2024 will be fully reviewed during the site plan process and comments will be provided at that time.

For more information, please contact [sourcewater@centrewellington.ca](mailto:sourcewater@centrewellington.ca).

Sincerely,

05/05/2026

Keira Martinson  
Source Protection Coordinator  
519-846-9691 ext 236  
[kmartinson@centrewellington.ca](mailto:kmartinson@centrewellington.ca)

06/05/2026

Kyle Davis  
Risk Management Official  
519-846-9691 ext 362  
[kdavis@centrewellington.ca](mailto:kdavis@centrewellington.ca)



3 - 7 Edinburgh Road South, Guelph, ON, N1H 5N8

May 5, 2026

Township of Puslinch  
7404 Wellington Rd. 34, Puslinch, ON  
N0B 2J0  
Attn. Monika Farncombe, Planning and Corporate Services Coordinator

**RE: Ecology Technical Comments - File # D14-ONT, Roll Number -  
2301000002125000000 - 6676-6678 Wellington Rd. 34 -3rd Submission**

Dear Monika,

Thank you for inviting Dougan Ecology to provide technical comments on the third submission application for a Zoning By-law Amendment (ZBA) concerning the lands municipally known as 6676-6678 Wellington Rd. 34. The application is for a temporary use by-law to rezone the subject lands for 3 years to permit the temporary use of a liquid soil management operation on a portion of the property.

As part of this application, Dougan has reviewed the following documents:

- GHD's EIA addendum "response letter" titled *"Response to Review of Temporary Use by-Law Amendment Application Ecology Technical Comments - 6678 Wellington Road 34, Puslinch, Ontario"* (April 08, 2026)

As requested, our response to the second submission is outlined below:

1. **Application Support** - are there any technical concerns arising from your review of the reports submitted with the application?

**Reply:** With the additional context provided regarding the aggregate licence history and removal of the woodland feature, we can support the proposed refinement of the Greenlands boundary.



The rehabilitation plan (2024) addresses woodland removal associated with the historic aggregate operation and does not address impacts arising from the current application.

The proposed temporary use introduces ongoing operational activities within and adjacent to the Greenlands system, including site disturbance, edge effects, and potential interactions with adjacent natural heritage features and wildlife. These impacts have been identified through the EIS review process and require mitigation, monitoring, and restoration.

As such, a Restoration/Enhancement Plan is required to address **current and incremental impacts associated with the proposed use**, and shall be secured through the Site Plan Approval process.

Any restoration or enhancement required to address the current proposal shall be **in addition to**, and not in substitution for, the approved ARA Rehabilitation Plan.

As previously noted, the following items should be included as a condition of Site Plan Approval:

- Restoration/Enhancement Plan addressing current and incremental impacts associated with the proposed use
- Performance Monitoring Plan to confirm effectiveness of mitigation measures and allow for adaptive management

We trust these comments assist the Township in advancing its review of the application..

Sincerely,



Summer Graham, B.Sc. Eco. Mgmt. Tech. ISA  
Ecologist - Restoration

Todd Fell, OALA, CSLA, CERP  
Principal, Manager of Landscape  
Architecture

