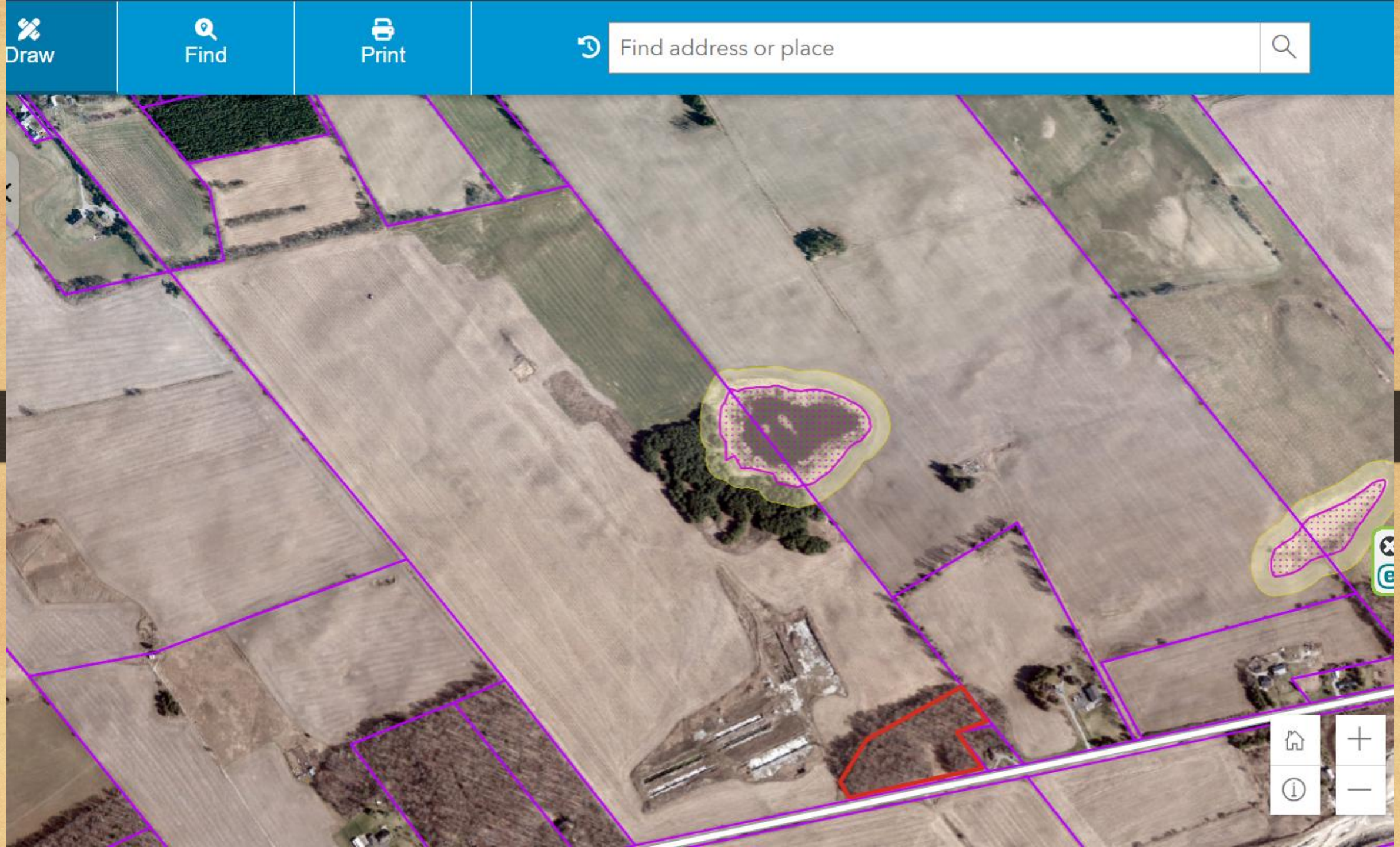
BY-LAW NO. 2024 - 12

Rezoning Lot 10 south of Bleams Rd

based on incomplete studies and without structured guidance to safeguard groundwater.


Draw
Find
Print
Find address or place

The Region's February 7, 2020 comments identified the need for a Record of Site Condition (RSC) to address contamination. These comments have been addressed through the filing of a Record of Site Condition with the Ministry of the Environment, Conservation and Parks (MECP) on August 25, 2020 as RSC #227095. The Region is in receipt of a letter of acknowledgement dated August 25, 2020. The Region has no further requirements with respect to site contamination.

Note: Under Part XV .1 of the Environmental Protection Act, a Record of Site Condition (RSC) must be completed and filed in the Environmental Site Registry if a property owner wishes to obtain protection from potential future environmental orders for the property as specified in Part XV .1.

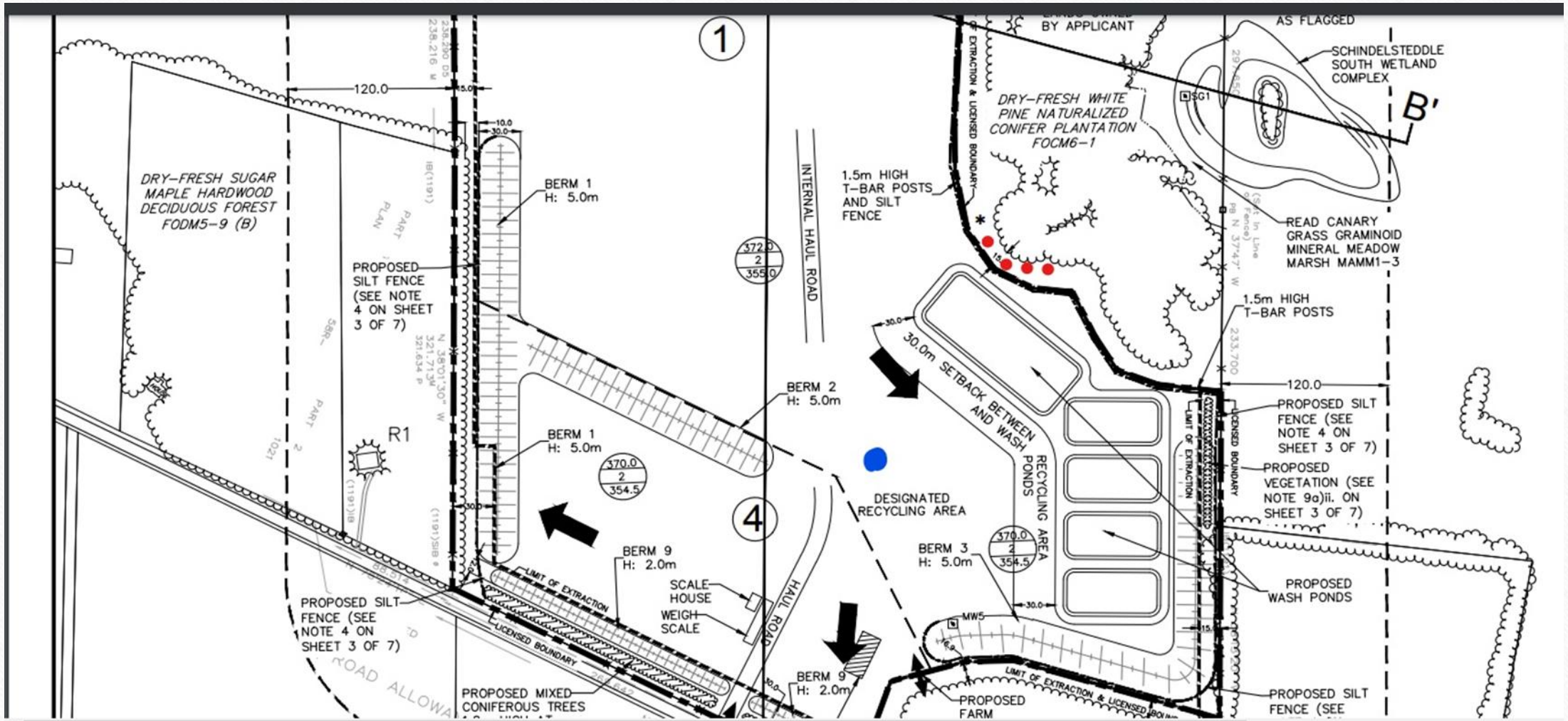
Copy from the RSC:

Record of Site Condition Number 227095 Date Filed to Environmental Site Registry 2020/08/25
Certification Date 2020/04/30
Current Property Use Residential
Intended Property Use Industrial
Certificate of Property Use Number No CPU
Applicable Site Condition Standards Full Depth Generic Site Conditions Standard, with Potable Ground Water, for Industrial property use
Property Municipal Address 1922 WITMER ROAD, PETERSBURG, ON, N0B 2H0, 1894 WITMER ROAD, PETERSBURG, ON,

The purpose of this wellhead set up was to dilute liquid manure from the lagoon (large pipe coming from opposite the lane that acted as a dam) with fresh water and distribute via an underground system.
There was once an insulated shed protecting the well / pump station from frost, as seen in older areal pictures.

It was never investigated if this set up was fit with a backflow valve or if contaminated water could enter the aquafer below whenever the well was shut off.

Was the water sampled ?



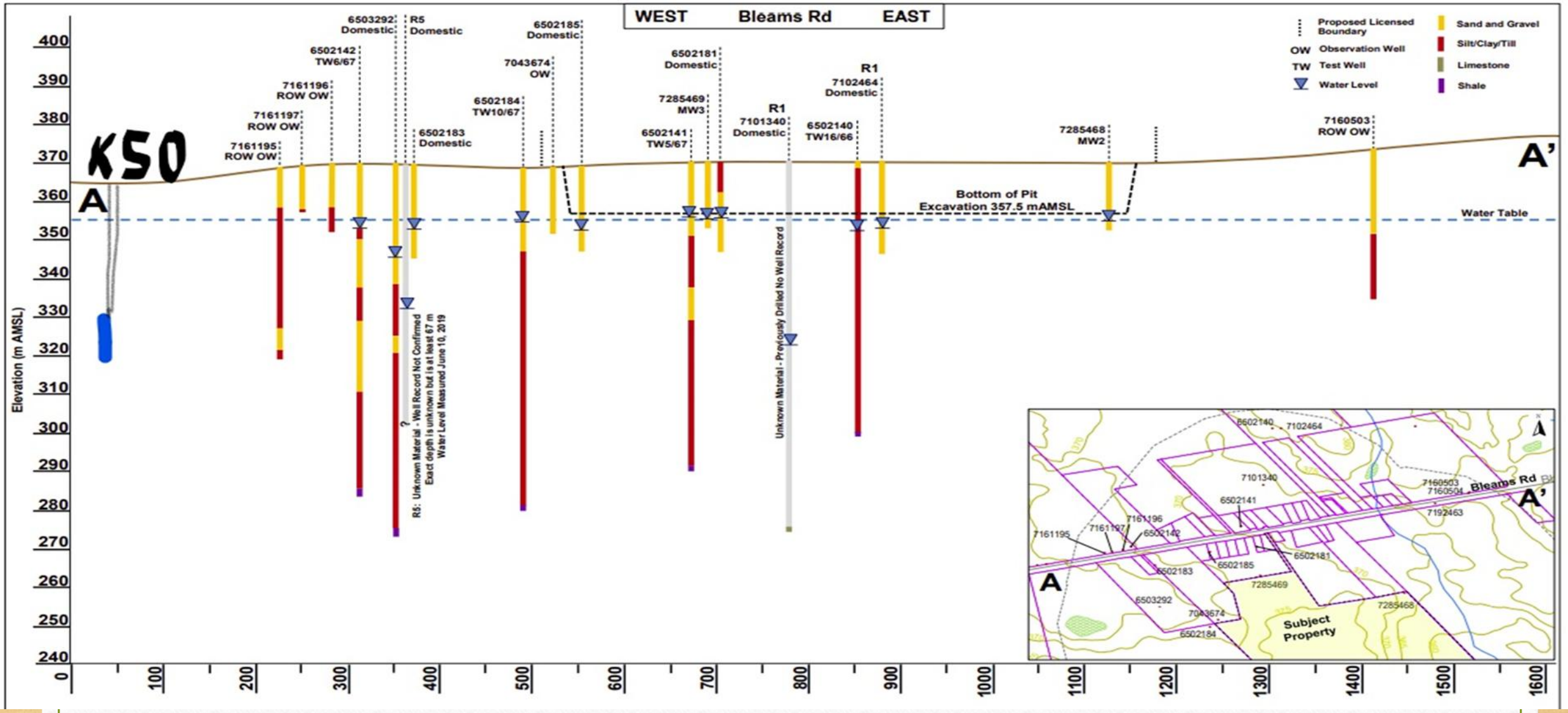
The operational plans do not show the location of this well.
The Blue Dot added to this plan represents the approximate location of the irrigation well.
Conveniently located next to the first wash pond but also next to the designated concrete and asphalt recycling area.

Why it matters: No need to apply for a permit to take water?

Would asphalt storage and recycling be permitted on top of a wellhead?

70% of Baden and New Hamburg Water needs are met by wells K50 and K51

- The Wellfield at Risk
  - Location of Regional Wells to Hallman pit



The depth of the Regional Wells are not demonstrated in this chart prepared by Harden. K50 and K51 are not deep wells and draw water only 25 meters below the proposed pit floor.

Notwithstanding the provisions of By-law 83-38, as amended, on the lands described on Schedule "A" and identified as Zone 14 on Schedule "B" attached to and forming part of this By-law, the following additional uses shall be permitted:

a) The importation of broken concrete and asphalt for recycling, subject to the following:

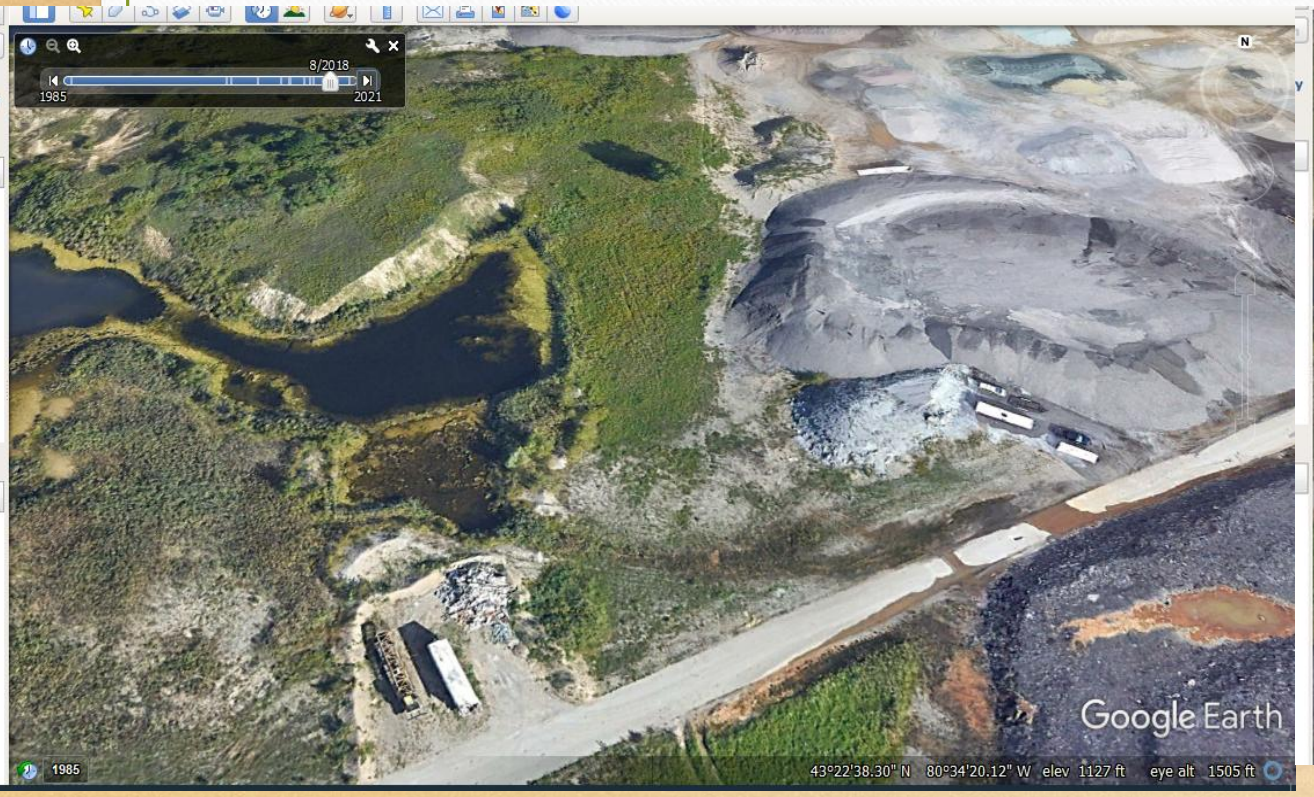
i) Keeping of materials associated with this use shall be limited to an area contained on the pit floor

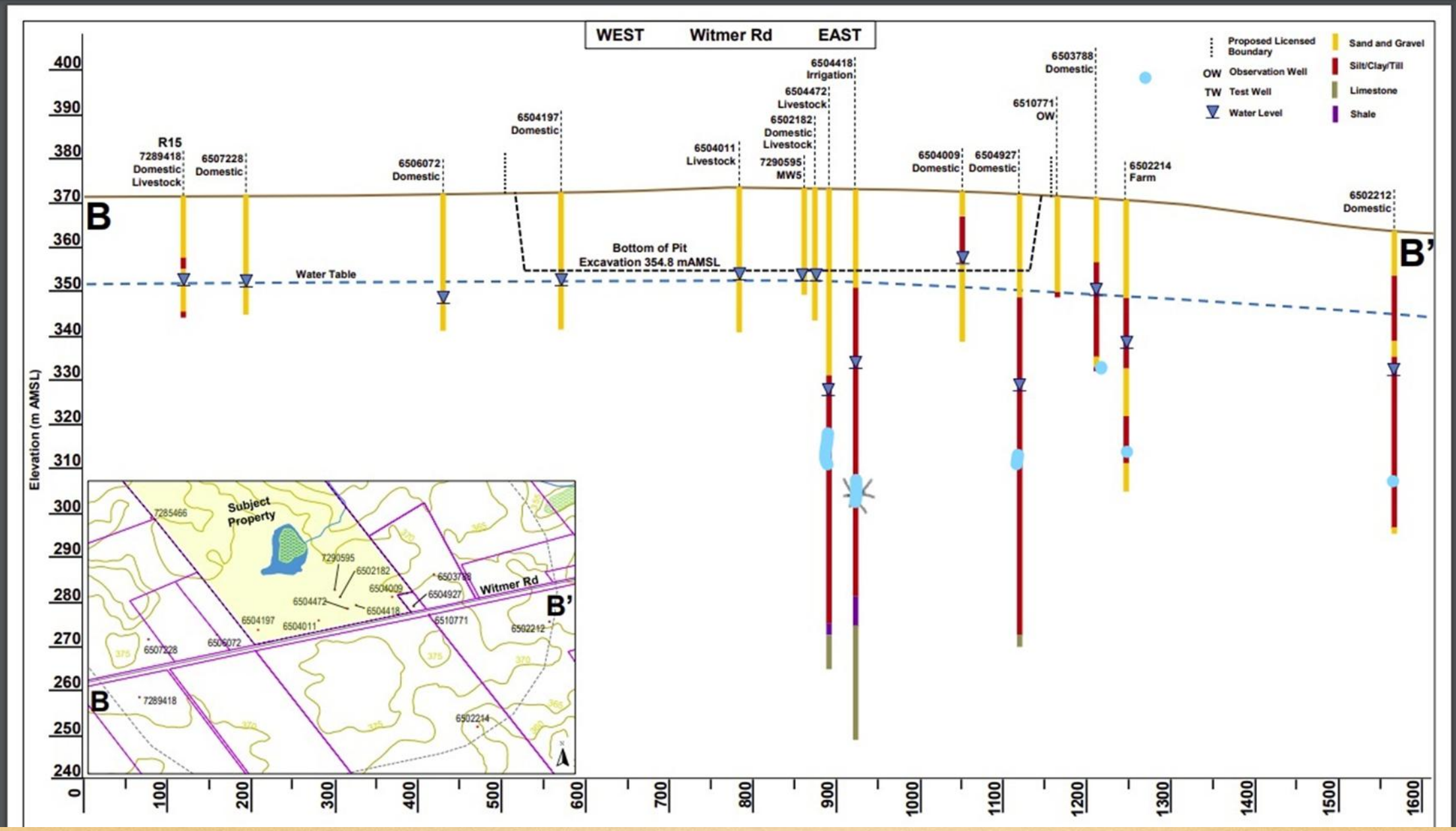
Runoff from Asphalt storage as seen at a pit south of and bordering Witmer Road

The brown patches in the picture are most likely hydro-carbon run off crossing the road even on a summer's day.

We are promised that a 30-meter distance between the asphalt recycling area and wash ponds sitting in the water table will keep us safe.

In reality, outcomes like these could be expected in the Hallman pit too.




WEST
Witmer Rd
EAST
Proposed Licensed Boundary
OW Observation Well
TW Test Well
Water Level
Sand and Gravel
Silt/Clay/Till
Limestone
Shale
R15
7289418
Domestic
Livestock
6507228
Domestic
6506072
Domestic
6504197
Domestic
6504011
Livestock
6504418
Irrigation
6504472
Livestock
6502182
Domestic
Livestock
7290595
MW5
6504009
Domestic
6504927
Domestic
6510771
OW
6503788
Domestic
6502214
Farm
6502212
Domestic
B
B'
Water Table
Bottom of Pit
Excavation 354.8 mAMSL
Elevation (m AMSL)
400
390
380
370
360
350
340
330
320
310
300
290
280
270
260
250
240
0
100
200
300
400
500
600
700
800
900
1000
1100
1200
1300
1400
1500
1600
Subject Property
7285466
Witmer Rd

While this chart shows the irrigation well as the deepest of all, the well record information was not used in any of the studies. Instead, off site well records were used to demonstrate a thick aquitard under the pit when in reality the irrigation well was able to pump 600 Gallons of water a minute possibly coming from within that layer.

The light blue areas (added by the writer) show the recommended intake screen setting at the time of well drilling according to the drill records.

Industrial sewage and Environmental compliance approval

The waters in aggregate wash ponds are considered

industrial sewage

by the ministry of the environment, and require an

ENVIRONMENTAL COMPLIANCE APPROVAL , ECA

Under section 20.2 of part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 for approval of:

Sewage works for the collection, transmission, treatment, disposal and reuse of wash water from a proposed aggregate wash plant, consisting of the following:

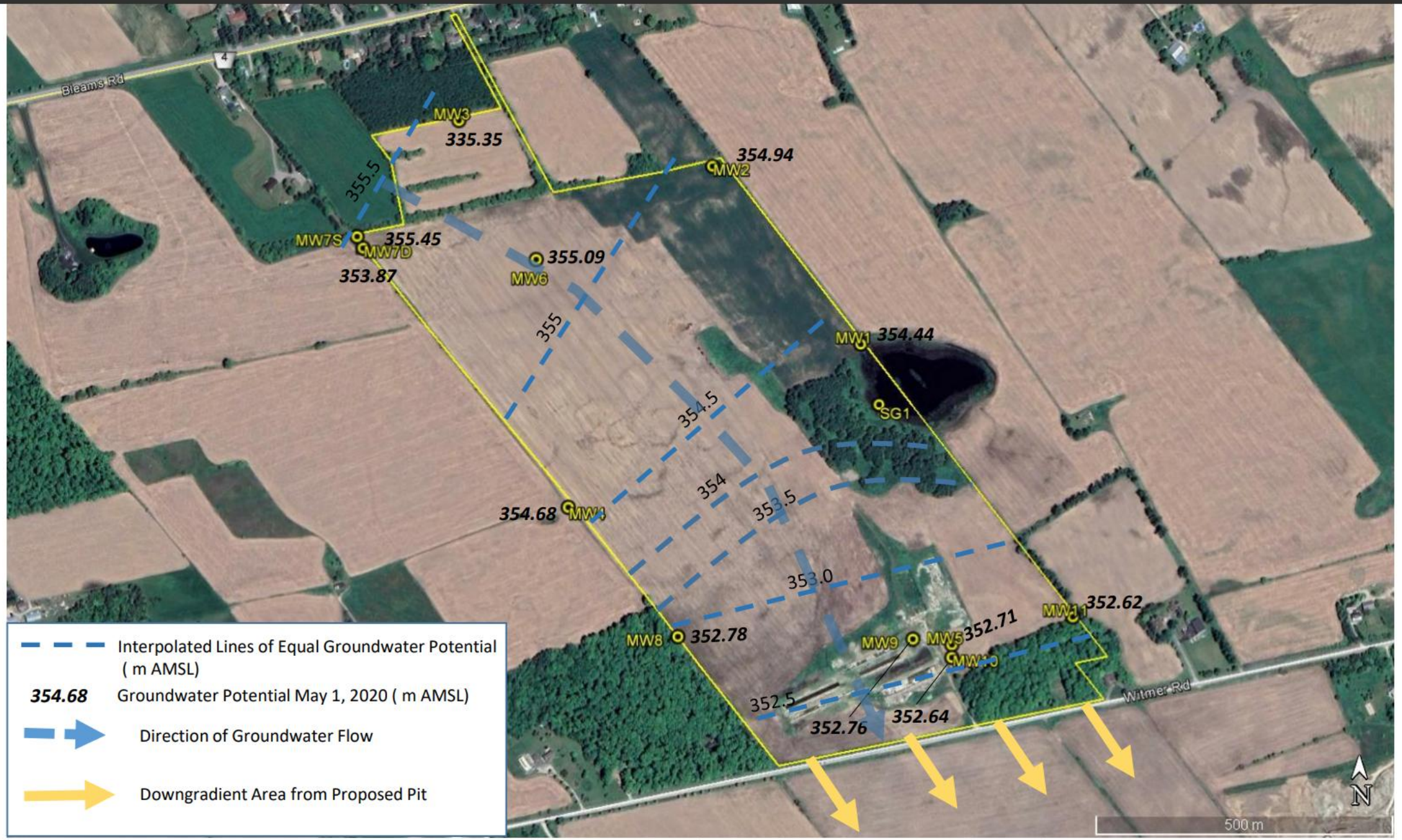
Harden Environmental Services Ltd.	**Project No:** 1728 **Date:** May 2020 **Drawn By:** AR	Spills Management Plan 1894 Witmer Rd, CON South of Bleams Rd, PT LOT 10 Township of Wilmot, Regional Municipality of Waterloo	**Figure 1: Well Locations**

The only Map showing on site wells: A1 and A2

In the document: Response to the Region of Waterloo Hallman Pit Hydrogeology by Harden environmental services Limited dated July 14 2020

Appendix H ; Spill Management plan shows 2 wells, A1 and A2 without further description. These wells are not shown in any other document nor are they described why they are important to spill plan. As a source of water in an emergency or in need of protection in case of a spill?

The location of A2 is the irrigation well and pump station, and therefore whoever prepared the document was aware of it but deliberately ignored the data from this well record when demonstrating a thick aquitard under the site.



Harden Environmental Services Ltd.	**Project No:** 1728 **Date:** Jun 2020 **Drawn By:** AR	Hydrogeological Assessment 1894 Witmer Rd, CON South of Bleams Rd, PT LOT 10 Township of Wilmot, Regional Municipality of Waterloo	Figure 5: **Groundwater Equipotentials**

The May 2000 file shows Wells A1 and A2

The same file dated June 2000 doesn't show these wells.

1. Record of Site Condition: Was not valid for the entire property

2. Environmental Site Assessment: Incomplete

3. Hydrological Assessments, Well records missing

4. Agricultural Impact Assessment: Incomplete

5. Operational plans: Incomplete

6. Project not meeting Ontario Water Quality Objectives (3.2.2)

The purpose of these slides is to demonstrate how missing information has misled the reviewers of the Hallman pit application.
Expert reviewers and staff were systematically misled with incomplete documents.

- It would be very irresponsible to permit **aggregate wash ponds and asphalt recycling** in this highly sensitive landscape. A gravel pit **without these 2 activities** was deemed by regional Staff as a manageable risk, but still requiring a water treatment plant next to the regional wells.