

**Attachment 2: Amended Proposed Grand River Source Protection Plan – Pre-
Consultation Comment Summary**

Grand River Source Protection Plan Pre-Consultation Comments

The Grand River Source Protection Plan (except for Section 9: Region of Waterloo) was circulated for a pre-consultation period from December 18, 2014 to February 13, 2015. The Section 9: Region of Waterloo was circulated on January 28, 2015 and comments could be submitted until February 27, 2015. The following Ministries/Agencies were given the opportunity review the Amended Proposed Plan and provide comment. Ministries listed in green below have provided comments.

Ministry/Agency	Date Comments Received	Ministry/Agency	Date Comments Received
Ministry of Environment and Climate Change	Comments received January 29, 2015	Ministry of Consumer Services	No comments received as of March 5, 2015
Ministry of Agriculture, Food and Rural Affairs	Comments received Feb 17, 2015	Transport Standards and Safety Authority	No comments received as of March 5, 2015
Ministry of Natural Resources and Forestry	No comments received as of March 5, 2015	Environment Canada	No comments received as of March 5, 2015
Ministry of Municipal Affairs and Housing	Comments received Feb 13, 2015 Region of Waterloo Comments Received February 24, 2015	Transport Canada	No comments received as of March 5, 2015
Ministry of Transportation	Region of Waterloo Comments Received Feb 27, 2015		

Ministry of Environment and Climate Change – Pre-Consultation Comments received Jan 29, 2015

The following is a summary of the pre-consultation comments received from the MOECC. Many of these comments requested further clarification or revisions based on the MOECC's initial comments received between December 2013 and July 2014. The comments are grouped based on the initial comment batch in which they were received from the MOECC and the comment number matches those used in the original comment batches. The updated comments from the Ministry are in the right most column of the table below and are under the heading **MOECC Comment January 29, 2015**. A recommended response to the pre-consultation comment is included under the heading **Recommended Response March 12, 2015**. Note: the Ministry did not submit pre-consultation comments regarding the Region of Waterloo source protection policies.

Batch 1: Grand River Proposed Source Protection Plan: Summary of Recommended Revisions for the Townships of Southgate, Amaranth and East Garafraxa, the Town of Grand Valley and Oxford County – received December 24, 2013			
To: Craig Ashbaugh, Martin Keller		From: John Westlake, Liaison Officer, Ministry of the Environment, SPPB	
#	Municipality	Comment Received	How Comment will be Addressed
C1	Amaranth and East Garafraxa	Policy DC-AEG-MC-1.13 is identified as a specify action policy for existing and future SDWTs that directs the Ministry of Natural Resources (MNR), Ministry of Agriculture and Food (OMAF), and MOE to advise the Townships of applications under review, and allow the Townships an opportunity to	Recommendation to not change policy. Amaranth and East Garafraxa would like to be informed of all applications, including those that are classified as

		<p>provide comments on the applications.</p> <p>MNR has noted that “applications”, as referred to in the policy would include applications under the Aggregates Resources Act (ARA), including minor site plan amendments that have little potential to impact groundwater resources. MNR therefore requests that the policy be revised to exclude minor site plan amendments under the ARA.</p> <p>Further, the policy appears on List C and List K in the legal lists of policies in Appendix A. The actions of the policy do not address the risk of SDWTs for consistency and, therefore, should not appear on List C and List K. It should appear on List J.</p> <p>We recognize the intent of the policy is to ensure that municipalities and other stakeholders have consistent access to information related to PIs and consequently the opportunity to comment. MOE is committed to discussing with our ministry colleagues options to address the intent of this policy through the regular PI processes, such as clearly flagging EBR postings for ECAs that are subject to source protection policies so that municipalities may more easily find them and comment. We may have additional comments at a later date as discussions on this policy are ongoing.</p>	<p>minor by MNR.</p> <p>MOECC Comment January 29, 2015: Will provide comments during public consultation, as discussion with MNRF are ongoing.</p>
C2	Amaranth and East Garafraxa	<p>The MOE has been reviewing salt policies, including the policy that asks the province to develop a licensing and accreditation program (DC-AEG-NB-9.2). Our goal is to have policies that are implementable, balance the province's programs and mandates, and to still maintain the intent of the policies. With this in mind, we recommended revisions to policy DC-AEG-NB-9.2.</p> <p>Road salt and snow storage best management practices (BMPs) have been developed by government and industry. The BMPs are primarily summarized in the Transportation Association of Canada's <i>Synthesis of Best Practices: Road Salt Management</i> and Environment Canada's <i>Code of Practice for the Environmental Management of Road Salts</i>. Road salt management plans are a widely recognized tool used by the public and private sector to establish and implement best practices locally. There are existing private sector organizations that train and certify municipal staff and private salt contractors to ensure salt BMPs are applied appropriately.</p> <p>We recognize the value of an accreditation program for de-icing contractors or practitioners and that the municipal sector has the most important role in ensuring good practices. Many municipalities have access to a number of credible and respected training/certification programs already in place in the field of salt management. We support municipalities having a choice to use the appropriate existing training/certification programs for their local situations.</p> <p>Therefore, it is recommended that the SPC modify the policy to have</p>	<p>Recommendation to keep policy intent as originally written.</p> <p>This policy aligns with a similar policy in the CTC plan (SAL-5) and is included here to ensure consistent policy applicability within the municipality across watershed boundaries.</p> <p>MOECC Comment January 29, 2015: MOECC recommends the municipalities reconsider revising policy DC-AEG-NB-9.2, so the implementation is local rather than provincial. This would align with existing local programs, such as the “Smart About Salt Program” delivered at the Region of Waterloo. Furthermore, this would avoid duplication of a program that is already delivered locally. It is important to note that the province's role is to provide guidance, develop government and industry standards, and develop best management practices to address the application of salt.</p>

		<p>municipalities promote the salt management programs of their choice that best suits their needs and encourage private road salt contractors to seek training and/or certification from existing certification and/or accreditation bodies. The policy could also have municipalities encourage managers of private facilities to certify their sites and use certified and/or accredited contractors.</p> <p>Please also consider if additional consultation would be necessary based on the changes made to the policy.</p>	<p><u>Recommended Response March 12, 2015</u></p> <p>Recommendation to revise policy to an E&O policy with the municipality identified as the implementing body.</p>
New Comment	Oxford County OC-NB-1.14	<p>Environmental Compliance Approvals and Consultation with Oxford County Existing/Future Specify Action Policy:</p> <p><i>“The Ministry of Environment and Climate Change should, collaboratively with the County develop a consultation process related to document sharing and consultation on the issuance and/or notification of prescribed instruments, which could be used to guide information exchange between the two agencies to protect municipal drinking water sources”.</i></p>	<p>MOECC Comment January 29, 2015:</p> <p>Although we haven't commented specifically on policy OC-NB-1.14 in the past, we have commented on similar policies that request MOECC to share information regarding prescribed instruments. Therefore, please refer to these past comments in order to revise the policy accordingly.</p> <p><u>Recommended Response March 12, 2015:</u></p> <p>Requested further clarification from MOECC and awaiting their response.</p>

Batch 2: Grand River Proposed Source Protection Plan: Summary of Recommended Revisions for the Wellington and Halton Sections – received March 10, 2014

To: Craig Ashbaugh, Martin Keller

From: Eugenia Chalambalacis, Program Analyst, Ministry of the Environment, SPPB

#	Municipality	Comment Received	How Comment will be Addressed
Batch 2 A2	Halton	<p>In the Wellington and Halton sections of the plan, there are existing activities that are not addressed by a policy. In Wellington, there are no policies to address existing storage of sewage (e.g., treatment plant tanks), sewage treatment plant effluent discharges, sewage treatment plant by-pass discharge to surface water, and runoff from de-icing activities at airports. In Halton, there are no policies to address existing handling and storage of road salt, storage of snow, and handling and storage of organic solvents activities.</p> <p>Please ensure that existing occurrences of significant drinking water threat (SDWT) activities are addressed through a policy, where applicable, along with an explanation in the explanatory document (ED). If a policy is not applicable and if the source protection committee (SPC) is confident there are no enumerated threat activities and decides not to include a policy for a</p>	<p>MOECC Comment January 29, 2015:</p> <p>In the <u>Halton</u> section of the plan there are still no policies to address the existing occurrences of the handling and storage of road salt and the storage of snow.</p> <p>Please ensure that existing occurrences of significant drinking water threat (SDWT) activities are addressed through a policy, where applicable, along with an explanation in the explanatory document (ED). If a policy is not applicable and if the source protection committee (SPC)</p>

		specific sub-category/circumstance, please provide an explanation in the ED.	<p>is confident there are no enumerated threat activities and decides not to include a policy for a specific sub-category/circumstance, please provide an explanation in the ED.</p> <p>Please note, the policy gaps in the Wellington section of the plan were addressed.</p> <p><u>Recommended Response March 12, 2015:</u> Recommendation to add statement to ED indicating the above activities do not exist in Halton Region.</p>
C 2	Halton	<p>HR-MC-3.2 requires MOE to ensure that the ECAs for on-site sewage systems include the appropriate terms and conditions to ensure the activity ceases to be and/or never becomes a SDWT. The second paragraph of the policy is identified as a monitoring policy (and is on List F of the legal lists); however, this second paragraph does not fit within the scope of monitoring policies as described in the legislation. This section of the policy should not be identified as a monitoring policy therefore removed as a policy on List F of the legal lists. It should remain on List C since it is a PI policy.</p> <p>Further, the policy requires the terms and conditions to, “include annual reporting to the Source Protection Authority of any monitoring and inspection programs required and their results.” This wording directs MOE to include specific terms and conditions in environmental compliance approvals. Please amend your policy to focus on the intended outcome of the policy. Where the SPC wants to include specific terms and conditions, please amend the policy indicate the province should consider, rather than require, including the specific conditions in prescribed instruments. MOE will consider the proposed terms and conditions in developing business processes for issuing or amending prescribed instruments for drinking water threats</p>	<p>Note: First paragraph of comment C2 has been addressed: Recommendation to remove “monitoring” from the policy side bar and remove policy from List F, and keep on list C.</p> <p>Second Paragraph - TBD. Internal MOE consultation is ongoing regarding matter as multiple SPRs and SPPs have this type of proposed policy.</p> <p><u>MOECC Comment January 29, 2015:</u> We noticed that policy HR-MC-3.2 has not been revised based on our original comment. Therefore, we recommend the removal of the last sentence in the second paragraph, as this statement does not fit within the scope of monitoring policies as described in the legislation: <i>“In addition the conditions shall include annual reporting to the Source Protection Authority of any monitoring and inspection programs required and their results”</i>.</p> <p>As well, there is already a monitoring policy that exists for reporting on prescribed instrument, which is policy HR-CW-1.11.</p>

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			Furthermore, since this section of the policy is not identified as a monitoring policy the word “monitoring” should be removed from the side bar, as well, it should be removed as a policy on List F of the legal lists and remain on List C, since it is a PI policy. <u>Recommended Response March 12, 2015:</u> Recommendation to revise policy and policy lists as requested.
Batch 3: Grand River Proposed Source Protection Plan: Summary of Recommended Revisions for the Region of Waterloo and City of Guelph Sections – received May 9, 2014 To: Craig Ashbaugh, Martin Keller From: John Westlake, Liaison Officer, Ministry of the Environment, SPPB			
#	Municipality	Comment Received	How Comment will be Addressed
A 3	Guelph and Waterloo	<p>Source protection committees have identified a wide range of reporting requirements. To enable consistent reporting, we are asking committees to make their monitoring policies more outcome-based to enable the province to effectively implement these policies. For example, “The ministry shall prepare an annual summary of the actions it has taken to achieve the outcomes of the source protection plan policies and make that report available to the SPA”. Where the committee has specific, detailed reporting requirements, we request that the committee revise the language to make these “recommendations”.</p> <p>The province is developing performance metrics, informed by input from the source protection authorities and committees, which will help formalize the provincial reporting framework. We will continue to build additional reporting elements over time to address reporting needs and make this information available publicly.</p> <p>Therefore please make revisions to the monitoring policies CG-CW-1.11, CG-MC-1.15(b), CG-NB-1.15(b), RW-CW-1.11, RW-MC-1.16(b), and RW-NB-1.17(b).</p> <p>As you consider revising your monitoring policies, it may be helpful for you to know that the province is already delivering on some of the reporting elements through our existing Access Environment. This is a geospatially enabled database allows the public to access any Environmental Compliance Approval issued since the late 1990s - http://ontario.ca/im81.</p>	<p>Guelph – No recommended changes; the policies as set out reflect the requirements of the City of Guelph.</p> <p>Region of Waterloo - Recommendation to revise wording of RW-CW-1.11.</p> <p><u>MOECC Comment January 29, 2015:</u> Please update in accordance with recent discussion with the MOECC.</p> <p><u>Recommended Response March 12, 2015:</u> Recommendation to revise Condition site policies (CG-MC-1.15(b), CG-NB-1.15(b), RW-MC-1.16(b), and RW-NB-1.17(b)) as per discussions with MOECC.</p> <p>Policy RW-CW-1.11 has been deleted.</p>

		We will continue to work with source protection authorities to look at opportunities to increase access to information to address local reporting needs.	
A5	Guelph & Waterloo	Policies CG-NB-1.16(b) and RW-NB-1.17 (c), request that the MOE provide the City of Guelph and the Regional Municipality of Waterloo with documentation related to conditions sites on the authority of s. 87 in the Clean Water Act. The CWA and associated regulations require that source protection plan policies that address significant threats meet the CWA section 22(2) objectives that threats cease to be/ do not become a SDWT. Policies CG-NB-1.16(b) and RW-NB-1.17(c) do not meet this requirement and are therefore not permissible policies to include in a source protection plan. The intent of these policies is to gather information to inform the next round of source protection planning. Although we understand the interest in receiving this information it is not permissible content for the source protection plan. As such, SPPB requests removal of the policy.	<p><u>MOECC Comment January 29, 2015:</u> Please update in accordance with recent discussion with the MOECC.</p> <p><u>Recommended Response March 12, 2015:</u> Recommendation to revise Condition site policies CG-NB-1.16(b) and RW-NB-1.17 (c) as per discussions with MOECC.</p>
Batch 3 C15a	Guelph	<p>The following are activities that do not appear to be addressed through policies and the plan, and there is no explanation in the ED as to why these activities have not been addressed through policies. Please ensure that existing and future occurrences of SDWT activities are addressed through a policy. In the case of a policy for existing activities, if the SPC is confident there are no enumerated threat activities and decides not to include a policy for a specific sub-category/circumstance, please provide an explanation in the ED.</p> <p>a. While there are land use planning, E/O and specify action policies to address future handling/storage of salt activities where they are significant threats, there are no corresponding policies to address existing occurrences of these threats.</p>	<p><u>MOECC Comment January 29, 2015:</u> In the Guelph section of the plan, there are no policies to address the existing occurrences of the handling/storage of salt activities where they are significant threats.</p> <p>Please ensure that existing occurrences of SDWT activities are addressed through a policy, where applicable, along with an explanation in the explanatory document (ED). If a policy is not applicable and if the SPC is confident there are no enumerated threat activities and decides not to include a policy for a specific sub-category/circumstance, please provide an explanation in the ED.</p> <p><u>Recommended Revision March 12, 2015:</u> Revise explanatory document to state there are no enumerated existing occurrences of salt handling or storage within the City of Guelph</p>
E 27	Waterloo	<p>We have recommended revisions for the purposes of clarity and/or consistency for some of the policies that address ICAs in the Waterloo Region section of the source protection plan. The issues identified are as follows. Please revise the policies as appropriate</p> <p>a. It is noted that the maps at the back of Chapter 9 illustrating the</p>	<p>Recommendation to:</p> <p>b.i) Take no action; the Region does not have combined sewers, so only policies addressing new sewers are</p>

		<p>locations of ICAs in the Waterloo region indicate that the Strange St, Parkway and Greenbrook well fields are “Chloride and/or Sodium” ICAs. According to the Assessment Report there are no sodium issues identified in these areas, while the maps seem to indicate that there is or could be a sodium issue. The maps should be consistent with the findings in the AR.</p> <p>b. The following comments are specific to the policies that address sewage threats:</p> <ul style="list-style-type: none"> i. The policies addressing the combined sewer sub-threat (RW-MC-13, RW-CW-14) do not address the nitrate ICA where the underlying vulnerability score is equal to or less than six and do not include any coverage for the TCE ICAs, where this sub-threat is considered significant. Additionally, RW-MC-13(a)(iii) prohibits new combined sewers in SOD/CHL ICAs, when this activity is not considered significant in these areas. ii. Significant threat policies RW-MC-16 to RW-CW-20 contain provisions to address the discharge of stormwater from a retention pond. These policies indicate that this threat is significant in sodium ICAs, when it is not. However, because sodium issues occur concurrently with chloride in this SPA, the policies apply regardless. For clarity the SPC may consider removing the reference to sodium in these policies. iii. Policy RW-CW-13(b) uses Pls to manage new sanitary sewers and related pipes. The policy identifies WHPA-E with a vulnerability of greater than 8 in a chloride and/or sodium ICA as part of the applicability area. This activity is not significant in these ICAs and therefore this provision should be removed. iv. The plan currently does not contain any policies to address either existing or future instances of a sewage treatment bypass to surface water. This threat is significant in the IPZ 1 and TCE and nitrate ICAs for wellheads with a WHPA-E. v. There are no policies to address existing sewage treatment plant effluent discharge activities in an ICA with an underlying vulnerability score of 8. Similarly, future occurrences in an ICA where the underlying WHPA scores less than 6 are not addressed. vi. Policy RW-CW-11 does not address the storage of sewage in Nitrate ICAs where the underlying WHPA scores less than 10. Additionally, the policy does not include the TCE ICAs, where this activity is considered a significant threat. <p>c. There are no policies in the plan to address:</p> <ul style="list-style-type: none"> i. The future application of ASM in a Nitrate ICA where the underlying vulnerability score is less than 10. ii. Future occurrences of permanent storage of ASM in a Nitrate 	<p>necessary.</p> <p>b.iv) Take no action; there are no existing sewage treatment plants with by passes in IPZ1 or WHPA-Es associated with a TCE issue. Neither the zoning nor availability of land allow for any future occurrences.</p> <p>b.v) Take no action; there are no existing subthreats in Nitrate ICAs.</p> <p>NOTE: Clauses a, b.ii, b.iii, b.vi and c of this comment have been revised according to the MOECC suggested approach.</p> <p>MOECC Comment January 29, 2015: MOECC are not able to comment on the revisions at this time, as we are still waiting for Region of Waterloo policies to be posted for consultation.</p> <p>Recommended Response March 12, 2015: Region of Waterloo policies have been revised to ensure there are policies to address every possible circumstance. Revised policies were circulated to MOECC for pre-consultation review on January 26, 2015. As of March 5, 2015 the Ministry has not provided comments.</p>
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Batch 4: Grand River Proposed Source Protection Plan: Summary of Recommended Revisions for the County of Perth, City of Hamilton, County of Brant and City of Brantford Sections – received June 27, 2014. To: Craig Ashbaugh, Martin Keller From: John Westlake, Liaison Officer, Ministry of the Environment and Climate Change, SPPB			
#	Municipality	Comment Received	How Comment will be Addressed
N/A	Township of Southgate Dufferin County: Town of Grand Valley County of Perth – Perth East	<p>We have several comments, outlined below, for the definition of “existing” and “new or future” set out at the front of each chapter of the Grand River plan. Many of the definitions of “existing” and “future” have similar elements and we have highlighted challenges or concerns with these elements. Please review our comments below and consider these comments in light of each definition of “existing” and “new or future”:</p> <p>a) Where a definition includes multiple scenarios, please include the term “or” at the end of the scenario where it has not already been included, as it could be misconstrued that all scenarios must be met.</p> <p>b) Where the definition of “existing” includes the term “legally” or the term “lawfully”, this implies that the existing activity is regulated. Prior to source protection plans taking effect, some threats are not regulated, such as handling and storage of DNAPLs, organic solvents and snow. The terms “legally” and “lawfully” should be removed.</p> <p>c) Where a definition includes the term “provides greater protection to sources of drinking water”, it may be difficult to establish how an activity could meet this requirement. For example, if a restaurant with fuel storage replaces its fuel tank to a new location, but the tanks are exactly the same, then the restaurant cannot relocate its fuel tank because it hasn't demonstrated how it has provided greater protection to drinking water. This definition also could be viewed as conflicting with the “cease to be SDWT” test required in section 22. Please remove “but improved to provide greater</p>	<p>MOECC Comment January 29, 2015:</p> <p>There were no revisions made to the definitions for the following areas:</p> <p>i). County of Grey – Township of Southgate,</p> <p>ii). Dufferin County - Town of Grand Valley, and</p> <p>iii). Perth East.</p> <p>MOECC recommends that these areas reconsider revising the language in their definitions of “existing” and “future” so it aligns with the other areas.</p> <p>As for the areas that did revise their definitions, the MOECC is currently reviewing the new revised definitions and will provide additional comments if needed during public consultation.</p> <p>Recommended Response March 12, 2015:</p> <p>Recommendation to revise Grand Valley and Southgate definitions as per comments from MOECC.</p>

		<p>protection to drinking water";</p> <p>d) Where a definition includes the term "except when expressly prohibited", it is unclear when this applies. Does this mean the activity is prohibited in the source protection plan or a related land use is prohibited in the municipal zoning or other by-law?</p> <p>e) Where the definition includes the requirement to "bring a building or structure closer into conformity with the source protection plan" is unclear as there are a number of requirements and a number of tools and legal effects in source protection planning. This is unlike land use planning which relies on specific OP and zoning conformity provisions. For example, the source protection plan uses E/O; how does a building come closer into compliance with an E/O policy? The provisions of the source protection plan policy will satisfy the requirement that an activity is appropriately managed, therefore, it is unnecessary for the definition of existing to ensure that the activity is managed.</p> <p>To capture the intentions of sections b) to e) above it would be appropriate to consolidate these sections as: b) an activity may be expanded subject to the relevant provisions in the source protection plan.</p>	<p>Recommendation to revise Perth County definition to:</p> <p>"any activity that has started or has been engaged in at a location in a vulnerable area before the Source Protection Plan takes effect"</p>
Director Letter #2 and #16	All Areas	<p>General comment that was provided for various areas:</p> <p>There are a number of policies in the Grand River SPP that prohibit existing activities, as well there are a number of agricultural activities that are prohibited outside of the WHPA-A.</p>	<p>MOECC Comment January 29, 2015:</p> <p>i). Please provide the MOECC with additional information about your stakeholder consultation given the enumerated threat activities associated with the policies that prohibit existing occurrences. As well, an updated list of enumerated threats.</p> <p>ii). OMAFRA has expressed concern with policies that prohibit existing occurrences of various agricultural activities outside of WHPA-A. OMAFRA has indicated that they do not support this approach and request that changes be made to policies so that they manage rather than prohibit.</p> <p>If the source protection committee (SPC) is confident there are no enumerated threat activities and continue to prohibit in the areas beyond the WHPA-A, please provide an explanation in the ED and provide the MOECC with additional information about your stakeholder</p>

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			<p>consultation given the enumerated threat activities associated with the policies that prohibit existing occurrences. As well, an updated list of enumerated threats.</p> <p><u>Recommended Response March 12, 2015:</u></p> <p>Staff are working with municipalities to compile this information and it will be included in the re-submission of the GRSP.</p> <p>The matrix being used to collect the above requested information has been sent to the MOECC for their review to ensure it provides the necessary information.</p>
Batch 5 A1	Various Areas	Some municipalities have raised concerns that multiple policy outcomes will apply within their boundaries as their municipality is within multiple source protection areas/regions. Also, there may be situations in the Grand River Source Protection Area where neighbouring landowners are subject to different policy outcomes for the same risk activity as municipalities have taken different policy approaches. Given the complexity of the plan, we would like the SPA to provide a summary of where municipalities or neighbouring landowners are subject to different policy outcomes. We would also like to discuss how you have addressed municipal concerns related to this issue.	<p><u>MOECC Comment January 29, 2015:</u></p> <p>Please provide MOECC with additional information on how the SPC has addressed the municipal and landowner concerns regarding cross jurisdiction of policies. A statement in the ED explaining how the SPC has addressed this would be helpful as well.</p> <p><u>Recommended Response March 12, 2015:</u></p> <p>Once policy revisions are finalized staff will undertake an analysis to identify any areas where there may be cross boundary issues with respect to policy tools/approaches used.</p>

MINOR Revisions – MOECC Received January 29, 2015**Grand River Proposed Source Protection Plan: Summary of Recommended MINOR Revisions - received January 29, 2015**

To: Craig Ashbaugh, Martin Keller

From: Pamela Lamba, Program Analyst and Heather Gardiner, Liaison Officer, Ministry of the Environment & Climate Change, SPPB

#	Municipality	Comment Received	How Comment will be Addressed
B1 C#4	Southgate	GC-S-CW-5.1 is a Risk Management Plan (RMP) policy for future application of pesticides and existing handling and storage of pesticides. The policy requires the content of the RMP to be generally based on the Nutrient Management Act (NMA) combined with any modifications or additional requirements as the Risk Management Official (RMO) deems necessary or appropriate. The NMA does not include the legislative authority to address pesticides; therefore, it is not appropriate for the policy to require the RMP content to be based on the NMA. If you intended to include measures required for other activities on farms (i.e., setbacks) then it is recommended that the policy provide general measures in the policy as a suggestion to the RMO, rather than referencing the NMA. Please revise the policy wording accordingly.	<p>MOECC Comment January 29, 2015:</p> <p>The reference to NMA was removed, but there is still reference to the NMP. Our original comment also applies to the reference to the NMP, and therefore, should be removed as well.</p> <p>Recommended Response March 12, 2015:</p> <p>Recommendation to remove reference to the nutrient management plan.</p>
B2 B#2	Wellington	<p>There are several instances throughout the significant threat policies in this portion of the plan where relevant ICAs have not been included in the applicable areas, either in the sidebar or the text of policies for threat activities that contribute to issues. This discrepancy occurs in the following policies:</p> <ul style="list-style-type: none"> Policies WC-CW-3.1 to 3.3, which address the septic system and septic system holding tank sub-threats and policies WC-CW-12.1, 14.1 and 14.2 for the application of salt and storage of snow identify nitrate and chloride ICAs as applicable areas. These activities also contribute to sodium issues and it is recommended that the policies be revised to include the sodium ICAs in the applicable areas. WC-MC-9.1: This policy addresses the future and existing handling and storage of commercial fertilizer. This threat is significant in a nitrate ICA, but this is not indicated in the applicable areas associated with this policy. It is recommended that revisions be made to this policy, or a policy be added, to address this threat within the nitrate ICAs in this plan area. WC-CW-13.3: This E/O policy for the handling and storage of road salt incorrectly identifies the nitrate ICAs in the applicable area. This threat activity is not significant in the ICAs for nitrate, but is, however, significant in sodium and chloride ICAs. The applicable area for this policy should be revised to include the appropriate ICAs. 	<p>MOECC Comment January 29, 2015:</p> <p>The nitrate ICAs are not captured in the applicable areas in the side bar or policy text for policies WC-CW-19.1 and WC-CW-19.2. Please include these areas in the policy sidebar, if applicable.</p> <p>Recommended Response March 12, 2015:</p> <p>Wellington County confirmed policies 19.1 and 19.2 are not intended to be applicable in a nitrate ICA where the vulnerability score is equal to 10. Policies 19.3 and 19.4 are applicable in a nitrate ICA where the vulnerability is less than 10.</p>

Grand River Proposed Source Protection Plan: Summary of Recommended MINOR Revisions - received January 29, 2015

To: Craig Ashbaugh, Martin Keller

From: Pamela Lamba, Program Analyst and Heather Gardiner, Liaison Officer, Ministry of the Environment & Climate Change, SPPB

#	Municipality	Comment Received	How Comment will be Addressed
		<ul style="list-style-type: none"> WC-CW-19.1 and WC-CW-19.2: These policies address activities which are a significant threat in nitrate ICAs, but this is not captured in the applicable areas in the sidebar or policy text for either policy. These policies should be revised to include the appropriate ICAs in the list of applicable areas. 	
B2 C8	Halton	<p>We noted some typographical errors during our review we wanted to share with you:</p> <ul style="list-style-type: none"> Typos/mistakes on the legal lists: <ul style="list-style-type: none"> HR-CW-1.3 is a s.59 policy that should appear on lists G (s.57) and H (s.58) HR-CW-4.3 appears on List G, but there is no policy in the plan with this policy ID HR-CW-5.2 is a s.57 policy and therefore should not be on List H (s.58) The wording in HR-MC-3.3 says "...and sewage treatment <i>plan</i> effluent..." Heading "Section 59 Prohibition" on top of page 10-2 in ED. Section 59 policies are not prohibition policies. 	<p>MOECC Comment January 29, 2015: Policy HR-CW-4.3 still appears to be on list G, but there is no policy in the plan with this policy ID.</p> <p>Also, the title: "Section 59 Prohibition" on top of page 10-2 in the ED has not been revised. It should reference section 57, since section 59 policies are not prohibition policies.</p> <p>Recommended Response March 12, 2015: Remove policy HR-CW-4.3 from list G column in Appendix B – Table 2. Policy not included in Appendix A list G</p>
B3 C14	Guelph	We note that policy CG-NB-21 is the only policy which addresses existing application, handling/storage of NASM in WHPA B, while these activities are addressed through a number of other policies in the other vulnerable areas. We are identifying this inconsistency in case it was an oversight.	<p>MOECC Comment January 29, 2015: Can Guelph please clarify if it was their intention to only have one policy to address the existing/ future occurrences of the application, handling/storage of NASM in WHPA-B?</p> <p>Recommended Response March 12, 2015: City of Guelph has confirmed this is their intent.</p>
B3 D21	Guelph	<p>Minor and typographical errors:</p> <p>a. CG-CW-4 does not list the policy tool approach in the sidebar as is done with other policies.</p>	<p>MOECC Comment January 29, 2015: There is still an error in policy CG-MC-19, where "WHPA-A" was removed in the</p>

Grand River Proposed Source Protection Plan: Summary of Recommended MINOR Revisions - received January 29, 2015

To: Craig Ashbaugh, Martin Keller

From: Pamela Lamba, Program Analyst and Heather Gardiner, Liaison Officer, Ministry of the Environment & Climate Change, SPPB

#	Municipality	Comment Received	How Comment will be Addressed
		<p>b. CG-CW-17(b) is identified as a s.57 policy in the sidebar, but appears to be a s.58 policy</p> <p>c. Policy wording in CG-CW-26 notes the policy applies to WHPA A, but the sidebar only says WHPA B. We noted a similar inconsistency between the policy wording in CG-MC-19 and the related sidebar. Please review the sidebars and the policy wording for each of the policies to ensure they are consistent.</p> <p>d. The policy wording for CG-MC-35 says “handling and future storage” which could be more clearly written as “Future handling and storage...”</p> <p>e. In policy CG-CW-34 the sidebar for part (b) refers only to existing while the policy text refers to both existing and future activities. Additionally, the policy text states “excluding the storage of fuel less than or equal to 2,500 L”, which repeats in different terms the opening statement for the policy. This re-iteration is unnecessary and could potentially be confusing for readers.</p>	<p>policy text but the area is still referenced in the side bar. Therefore, please remove this reference.</p> <p><u>Recommended Response March 12, 2015:</u></p> <p>Policy still is applicable in WHPA-A (see green highlight). Only future application handling and storage has been revised to not be applicable in WHPA-A. Therefore policy sidebar should not be revised.</p> <p>Policy Text: “Where the existing application, or handling and storage of non-agricultural source material in a Wellhead Protection Area A is or where the future application, or handling and storage of non-agricultural source material in a Wellhead Protection Area A and B or where a nitrate issue has been identified would be a significant drinking water threat...”</p>
B4 A1	City of Hamilton	Within the Lake Erie (LE) plans there are policies that lay out the implementation timing for most of the threat policies and identify the effective date as the date of the posting of the notice of approval of the plan on the Environmental Registry (BC-CW-1.1, CB-CW-1.1, PC-CW-1.1, CH-CW-1.1). Consistent with our recommendations on the Catfish Creek and Kettle Creek plans, we recommend revising the wording in the policies to reflect when the plan takes effect.	<p><u>MOECC Comment January 29, 2015:</u></p> <p>For many of the policies we asked the SPC to change the language around the implementation timelines, which identify the effective date as the date of the posting of the notice of approval of the plan on the Environmental Registry. This reference was removed from most policies except for policy CH-CW-1.1, which is in the City of Hamilton section of the plan.</p> <p><u>Recommended Response March 12, 2015:</u></p>

Grand River Proposed Source Protection Plan: Summary of Recommended MINOR Revisions - received January 29, 2015

To: Craig Ashbaugh, Martin Keller

From: Pamela Lamba, Program Analyst and Heather Gardiner, Liaison Officer, Ministry of the Environment & Climate Change, SPPB

#	Municipality	Comment Received	How Comment will be Addressed
			Recommendation to remove reference to Environmental Registry from CH-CW-1.1
B4 D16	City of Hamilton	There is a need for better consistency and clarity in policies CH-MC-3.2 and CH-MC-3.3. It is unclear if the intention of policy CH-MC-3.2 is to prohibit the establishment of new sewage systems where they are SDWTs, or if the intent of the policy is to recommend that establishment of new systems take place outside of WHPA-A. Further, it is unclear how policies CH-MC-3.2 and CH-MC-3.3 are meant to complement each other to address sewage threats. Please review these policies and revise the policy wording as well as the rationale in the ED as appropriate.	MOECC Comment January 29, 2015: We understand the intent for policies CH-MC-3.2 and CH-MC-3.3 uses a combination of manage and/or prohibit for sewage related activities depending on the circumstances. It may be helpful to clarify this for the average reader in the policy and/or ED. Recommended Response March 12, 2015: Recommendation to clarify policy intent in ED.

Ministry of Municipal Affairs and Housing – Pre-Consultation Comments Received February 13, 2015

The following table contains comments received from MMAH regarding the Amended Proposed Grand River Source Protection Plan.

#	Municipality	MMAH Comment	Recommended Response
4.1	Amaranth/East Garafraxa	<p>New County Official Plan</p> <p>The County of Dufferin has adopted a new Official Plan which is now before the Ministry of Municipal Affairs and Housing for a decision under the <i>Planning Act</i>. Once in effect, the County Official Plan will be subject to the policies of the applicable Source Protection Plans and will have to be updated to ensure conformity. As such, any policies related to land use planning should be reviewed to ensure they reference and/or recognize the County of Dufferin as appropriate. While this appears to have been done in certain policies (e.g. DC-AEG-MC-1.3), it has not been updated in others (e.g. DC-AEG-CW-1.6).</p>	Recommendation to ensure reference to both Township and the County are included where appropriate in policy text.
4.2	Amaranth/East Garafraxa	<p>DC-AEG-MC-6.2 and DC-AEG-MC-7.1</p> <p>With respect to these proposed policies, the application of site plan control under the <i>Planning Act</i> is generally intended to regulate the placement of buildings and structures on a site, not to restrict activities associated with a permitted land use. As such, the policy should be revised to direct the use of site plan control as a tool to appropriately locate storage facilities on site. Alternatively, these activities could be designated under Section 58 of the <i>Clean Water Act</i>.</p>	Township staff are reviewing this comment – a recommended response and policy revisions (if required) will be presented following the public consultation period.
4.3	Amaranth/East Garafraxa	<p>DC-AEG-MC-13.3</p> <p>It is recommended that this proposed policy be revised to qualify the term “major” for clarity with respect to implementation. Further, this policy should be directed at the County of Dufferin and the municipalities who make decisions on development applications under the <i>Planning Act</i>.</p>	Recommendation to request Township staff to consider if they wish to qualify the term major for further clarity with respect to implementation.
4.4	Amaranth/East Garafraxa	<p>DC-AEG-MC-13.6</p> <p>It is recommended that this proposed policy be revised to reflect the County's future role as the planning approval authority. It is recommended the policy be revised to state, “To ensure any existing and future activity that reduces the recharge of an aquifer ceases to be or never becomes a significant threat within WHPA-Q2, the County of Dufferin, in consultation with the lower tier municipalities, shall examine municipal water supply servicing constraints when considering settlement area expansions within</p>	Recommendation to revise policy accordingly.

#	Municipality	MMAH Comment	Recommended Response
		WHPA-Q2”.	
4.5	Amaranth/East Garafraxa	<p>DC-AEG-CW-13.8</p> <p>It is recommended that this proposed policy be revised to reflect the County's future role as the planning approval authority. The County will be responsible for the allocation of future population and employment forecasts established through the Growth Plan. As such, this policy should be revised to delete references to provincial ministries and instead refer to the County of Dufferin.</p>	Recommendation to revise policy accordingly.
7.1	City of Guelph	<p>CG-CW-1.4</p> <p>In our previous comments dated January 16, 2013 and June 3, 2013, we questioned why residential uses are exempted from the <i>Planning Act</i> and building permit application pre-screening process by a risk management official. According to the supporting Explanatory Document, the exemption is proposed because “the potential of threat occurring in conjunction with a residential use is very low to non-existent. There is limited risk in not reviewing or pre-screening these applications under Part IV of the Clean Water Act, 2006.” The Explanatory Document also states, “within the City of Guelph, the wellhead protection areas cover the entire city and this wording was introduced to assist in managing workload considerations balanced against benefit of review and implementation of a risk management plan for these activities.”</p> <p>We are not in a position to comment on whether the potential of threats occurring in conjunction with a residential use is very low to non-existent. However, it is important to note the wellhead protection areas cover the entire City and of the Source Water Protection policies reviewed, the City of Guelph appears to be the only municipality containing this exemption. If this policy is approved, as submitted, it is suggested the assertion that the potential of threats occurring in conjunction with a residential use is very low to non-existent be confirmed.</p>	City of Guelph staff are reviewing this comment – a recommended response and policy revisions (if required) will be presented following the public consultation period.

#	Municipality	MMAH Comment	Recommended Response
7.2	City of Guelph	<p>CG-NB-1.22</p> <p>In our previous comments dated January 16, 2013 and June 3, 2013 we noted Policy CG-NB-1.22 states, “The City of Guelph should amend its Official Plan to require the assessment and mitigation of impacts of the establishment of transport pathways associated with Planning Act applications in Wellhead Protection Areas A and B where the vulnerability equals ten (10).” In our comments we made reference to previous comments we provided in a letter dated October 2012 on the Region of Waterloo’s draft transport pathway policies. More specifically, we suggested the Region of Waterloo’s policy and subsequently City of Guelph’s policy be revised to ensure the policy deals with land uses and not activities associated with land uses. It is noted no changes have been made to either policy.</p> <p>As drafted, Policy CG-NB-1.22 is vague. It does not provide direction as to how the Official Plan would be revised nor identify the types of <i>Planning Act</i> applications/development proposals to which the policy would apply. This policy may have more impacts than expected and our concern is that this concept may be applied more broadly than its intended purpose. We also continue to question whether the <i>Planning Act</i> is the tool to address the risk.</p>	City of Guelph staff are reviewing this comment – a recommended response and policy revisions (if required) will be presented following the public consultation period.
7.3	City of Guelph	<p>CG-MC-29 and CG-MC-35</p> <p>In our previous comments, we noted that these policies speak to the handling and storage of salt and fuel, respectively. The policy proposes that land use planning is the appropriate instrument to implement these policies and, as stated in previously, activities such as handling salt and fuel are not regulated through the <i>Planning Act</i>. Our concern has not been addressed. It is suggested Policies CG-MC-29 and CG-MC-35 be revised to limit scope of these policies to land uses.</p>	City of Guelph staff are reviewing this comment – a recommended response and policy revisions (if required) will be presented following the public consultation period.
10.1	County of Perth	Please note that the comments below regarding Oxford County apply equally to the comparable policy for Perth County (PC-CW-3.1).	Recommendation to revise policy accordingly.
11.1	County of Oxford	<p>OC-MC-3.2</p> <p>This policy speaks to the need for the County to amend its official plan and zoning by-law to prohibit uses, buildings and/or structures that would require a new septic system or septic system holding tank within WHPA-A and WHPA-B areas, to ensure these activities never become significant drinking water threats.</p> <p>We recommend the following changes, with new text in <i>italics</i>:</p>	Recommendation to remove references to the Official Plan from the policy as they are not required to enable the zoning prohibition required by the policy. Further, the following policy wording suggested by MMAH ‘and require those uses to be serviced by municipal services (Section 34(1)3.1 and 34(5) of the Planning Act’ was not included. The

#	Municipality	MMAH Comment	Recommended Response
		<p>“... the County shall amend their <i>its</i> Official Plan <i>to identify the significant drinking water threat areas and include direction that additional servicing constraints may be applied through municipal zoning by-laws.</i> the The area Municipalities shall amend their respective Zoning By-laws to prohibit uses, buildings and/or structures that would require a new septic system or septic system holding tank within such <i>identified significant drinking water threat areas and require those uses to be serviced by municipal services (Section 34(1)3.1 and 34(5) of the Planning Act)</i> to ensure these activities never become significant drinking water threats.”</p>	<p>County is concerned that adding this wording would create an expectation that municipal sewage services are planned for, or will be extended to, such areas. However, with the exception of significant threat areas located within designated settlements with existing municipal sewage services, this is not the case and, in fact, would conflict with the servicing policies contained in the Official Plan.</p>
13.1	County of Brant	<p>BC-MC-1.4 (page 13-3)</p> <p>We continue to recommend the deletion of the words “or activity”.</p> <p>In this regard, we appreciate that the definition of “activity” in the <i>Clean Water Act</i> (CWA) includes “a land use”. We have no argument with this, but it does not address our concern.</p> <p>As we have stated previously, we are concerned that, by including the words “or activity”, the SPP appears to be advocating for something which is not possible – the use of an official plan and or a zoning by-law to control an activity (such as manure spreading or the application of fertilizers or pesticides).</p> <p>We note that Section 34(1) 3.1 iii of the <i>Planning Act</i> speaks specifically to “an area identified as a vulnerable area in a drinking water source protection plan” but the prohibitions in this regard are limited to “any use of land and the erecting, locating or using of any class or classes of buildings or structures on land”.</p> <p>We acknowledge that threat activities may need to be addressed, but this should be accomplished by using other tools in the SPP or other existing legislative authority, not through official plans or zoning by-laws.</p> <p>We also suggest that, should a municipal official plan contain policies related to complete applications under Section 22(5) or 34(10.2) of the <i>Planning Act</i>, for clarity, the SPP should require these specific official plan policies be updated to cross-reference the prohibition on planning applications set out in Section 59(1) a of the <i>CWA</i> and Section 62 of O. Reg. 287/07.</p>	<p>Recommendation to add “as regulated by the Source Protection Plan.” to the end of clause b.</p>
13.2	County of Brant	<p>BC-CW-1.10 (page 13-4)</p> <p>This policy speaks to the requirement for the County to amend its official plan and zoning</p>	<p>Recommendation to revise policy accordingly.</p>

#	Municipality	MMAH Comment	Recommended Response
		<p>by-law to bring these planning documents into conformity with the SPP, and provide “proof of compliance ... within 30 days of adoption”.</p> <p>Our concern with this policy is that adoption is not necessarily proof of compliance. It would be advisable to replace the phrase “within 30 days of adoption of the amendment(s)” with the phrase “within 30 days of the amendments coming into effect”.</p>	
13.3	County of Brant	<p>BC-MC-5.2 (page 13-12)</p> <p>This proposed policy requires the County to include policies in its official plan that “all new development in vulnerable areas ... be designed and maintained based on best management practices regarding salt application and storage”. For many reasons, it does not appear to be a realistic or enforceable policy. Is the concern with the application of salt on municipal roads? If so, this should be addressed through the operational policies and practices of the County, and the implementation of best management practices in this regard. Is the concern with the application of salt on private property? If so, this should be addressed through education and outreach. Of greatest concern, an official plan may be used to address land use, not to regulate activities such as the application of road salt.</p>	Recommendation to revise policy to require the County's OP is amended to require a salt impact assessment as part of a complete development application.
13.4	County of Brant	<p>BC-MC-7.2 (page 13-12)</p> <p>This proposed policy requires the County to include policies in its official plan that require new developments to implement best management practices regarding snow storage. The intent of the policy is laudable but the objective is one which cannot be achieved by adding a policy in an official plan. It is unclear who would be responsible for ensuring that the policy is implemented and precisely how it would be implemented.</p>	Recommendation to revise policy to require the County's OP is amended to require a snow storage management plan as part of a complete development application.
14.1	City of Brantford	<p>CB-CW-1.2 (page 14-2)</p> <p>For the reasons noted above (BC-MC-1.4), we continue to recommend the deletion of the words “or activity”.</p>	Recommendation to add “as regulated by the Source Protection Plan.” to the end of clause b.
14.2	City of Brantford	<p>CB-CW-1.8 (page 14-4)</p> <p>For the reasons noted above (BC-CW-1.10), we recommend changes to this proposed policy.</p>	Recommendation to revise policy accordingly.
14.3	City of Brantford	<p>CB-MC-12.2 (page 14-10)</p> <p>Land use planning processes are not an appropriate tool to address the handling of fuel. Activities like this are not controlled by official plans or zoning by-laws. These planning documents could, if appropriate, prohibit a use which includes the storage of fuel but they</p>	Recommendation to revise policy text to address land use, not activities.

#	Municipality	MMAH Comment	Recommended Response
		do not address the handling of fuel.	
15.1	Haldimand County	HC-MC-1.2 (page 15-2) For the reasons noted above (BC-MC-1.4, CB-CW-1.2), we continue to recommend the deletion of the words “or activity”.	Recommendation to add “as regulated by the Source Protection Plan.” to the end of clause b.

#	Municipality	MMAH Comment	Recommended Response
1	Region of Waterloo	<p>1. RW-CW-1.1 (page 9-3) and RW-CW-1.19 (page 9-6)</p> <p>These policies refer to incentive programs. More specific details regarding incentive programs are also found in subsequent policies such as RW-CW-37, RW-CW-48, RW-CW-52 RW-CW-55.1 and RW-CW-59.</p> <p>The specific policies noted refer to “incentive programs for persons”, which is acceptable. If, however, any incentives are offered by a municipality to a commercial, manufacturing or industrial operation, it should be noted that the municipality may need to adopt a Community Improvement Plan under the <i>Planning Act</i> in order to provide such incentives.</p> <p>The incentive program under RW-CW-8.1 for existing small septic systems does not appear to have a purpose or focus clearly stated. For example, is the intent that existing systems be replaced or faulty systems repaired?</p>	Region of Waterloo staff continue to review these comments – recommended responses and policy revisions (if required) will be presented following the public consultation period.
2	Region of Waterloo	<p>2. RW-MC-1.2 (page 9-3)</p> <p>This policy speaks to the requirement for the Region and area municipalities to adopt amendments to official plans and complete amendments to zoning by-laws to ensure conformity with the specific threat policies. Policy RW-CW-1.9 requires that these notices of adoption be provided to the Source Protection Authority within 30 days.</p> <p>While we do not have concern with the wording of policy RW-MC-1.2, we do note that other SPPs have required “proof of compliance” that these planning documents have been brought into conformity with the SPP. Our only point here is to note that adoption is not necessarily proof of compliance.</p>	Region of Waterloo staff continue to review these comments – recommended responses and policy revisions (if required) will be presented following the public consultation period.
3	Region of Waterloo	<p>3. RW-MC-1.4 (page 9-4)</p> <p>This policy speaks to the need for official plan amendments to ensure conformity to significant drinking water threats. We note with approval that section b. of this policy correctly speaks only to uses and not activities. We hope that other SPPs will take a similar approach.</p>	Region of Waterloo staff continue to review these comments – recommended responses and policy revisions (if required) will be presented following the public consultation period.
4	Region of Waterloo	<p>4. RW-MC-6 (page 9-11)</p> <p>This policy speaks to the need for the Region and area municipalities to amend their</p>	Region of Waterloo staff continue to review these comments – recommended responses and policy revisions (if

#	Municipality	MMAH Comment	Recommended Response
		official plans to prohibit the creation of new lots that rely on servicing by a small septic system and/or require all new lots to have municipal wastewater servicing within WHPA-A and WHPA-B areas and other circumstances. This policy should stipulate that the requirement with respect to using municipal wastewater servicing should be subject to the presence of existing servicing only within existing settlement areas. The policy should not be used as a reason to extend municipal wastewater servicing where it does not currently exist.	required) will be presented following the public consultation period.

ONTARIO MINISTRY OF AGRICULTURE, FOOD and RURAL AFFAIRS – Comments received February 17, 2105

#	Municipality	OMAFRA Comment	Recommended Response
1	Grand Valley Halton Region Perth County	<p><i>Policies Proposing Prohibition in WHPAA/IPZ-1</i></p> <p>The ministry does not support prohibition of existing ASM storage in WHPA-A and WHPA-B zones and IPZ zones with a vulnerability score equal to ten (Policy DC-GV- CW-5.1, HR-CW-4.1, HR-CW-4.2, PC-CW-4.1). Recent research has demonstrated that the risk posed by existing ASM storage facilities to groundwater quality is small. The Explanatory Document states incorrectly that the Nutrient Management Act prohibits existing ASM storage within WHPA-A zones. Farmers have made significant investments in their storage facilities, and the costs for the farm operation of decommissioning existing effective storage structures and building new ones would be very expensive and could result in economic hardship. We recommend that Policies DC- GV-CW-5.1, HR-CW-4.1, HR-CW-4.2, PC-CW-4.1 be revised to allow for the management of risks associated with existing storage facilities within WHPA-A zones and IPZ zones with a vulnerability score equal to ten.</p>	<p>Grand Valley - 0 enumerated occurrences</p> <p>Halton Region – 2 potential locations identified (not verified)</p> <p>Perth County – 0 enumerated occurrences</p>
2	Grand Valley Oxford County	<p><i>Risk Management Plans for Farms Phased in under the NMA</i></p> <p>Proposed policies DC-GV-CW-4.1, DC-GV-CW-5.2, OC-CW-4.2 and OC-CW-5.2 include the phrase:</p> <p>...but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official.</p> <p>Proposed policy CH-CW-4. includes the requirement:</p> <p>The content shall be based upon, but not limited to, the regulatory requirements of a nutrient management plan and strategy under the Nutrient Management Act and scoped to address these specific threats.</p>	

#	Municipality	OMAFRA Comment	Recommended Response
		<p>The authority of the RMO regarding prescribed instruments is defined in Regulation 287/07. The highlighted portions of these policies imply that the RMO has authority that exceeds that provided by Regulation 287/07. If included in the Source Protection Plan, this policy will increase confusion between the RMO, the Source Protection Authority and stakeholders, and could increase the likelihood of a successful appeal concerning any additional conditions imposed by the RMO on a prescribed instrument. Therefore, we recommend that the highlighted phrases be deleted from policies that concern prescribed instruments.</p>	
3	All	<p><i>Education and Outreach Policies</i></p> <p>The ministry supports the proposed policies concerning the development and implementation of education and outreach (E&O) programs. Many of these proposed policies indicate that the E&O programs would build on existing programs. OMAFRA has numerous existing materials that are designed to promote increased awareness and implementation of appropriate agri-environmental management practices.</p>	No response required.

ONTARIO MINISTRY OF TRANSPORTATION – Comments received February 27, 2105

#	Municipality	MTO Comment	Recommended Response
1	Region of Waterloo	<p>Policy Number: RW-CW/NB-39</p> <p>MTO confirms that when the MTO Salt Management Plan undergoes review, the best available winter maintenance practices are supported to ensure safe driving conditions on the provincial highway network, and consideration is given to local environmental protection to the extent possible. MTO does not support the proposal to modify its Salt Management Plan specific to roadways in Wellhead Protection Areas with a vulnerability score of 6 or higher.</p> <p>The MTO Salt Management Plan contains best management practices to ensure application rate, timing and location to reduce the potential for salt-related surface water run-off and groundwater infiltration. Further, MTO ensures the Salt Management Plan meets the objectives of Environment Canada's Code of Practice for Environmental Management of Road Salts.</p> <p>The approach supports MTO's mandate to ensure safe driving conditions on the provincial highway network, and recognizes environmental considerations along with operational considerations.</p>	Region of Waterloo staff continue to review these comments – recommended responses and policy revisions (if required) will be presented following the public consultation period.
2	Region of Waterloo	<p>Policy Number: RW-CW/NB-40</p> <p>MTO is supportive of considering road design measures during the environmental assessment process to minimize impacts on source water. The environmental assessment process is an opportune time to include environmental considerations in road design measures as this process meant to capture, receive and address impacts such as those related to source water protection.</p>	Region of Waterloo staff continue to review these comments – recommended responses and policy revisions (if required) will be presented following the public consultation period.

**Attachment B: Amended Proposed Grand River Source Protection Plan
and Explanatory Document**

Policy Number	Policies Addressing Prescribed Drinking Water Threats within The Township of Southgate
Sewage System or Sewage System or	Sewage Works - Storage of Sewage (e.g., treatment plant tanks) Sewage Works- Sewage Treatment Plant Effluent Discharges
GC-S-MC-3.3 <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure any existing or new sewage treatment plant with effluent and/or bypass discharge or new sewage treatment plants with sewage storage tanks ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Ministry of the Environment shall prohibit these activities within the Environmental Compliance Approvals process for such sewage treatment plants on lands located within identified vulnerable areas.
Sewage System or	Sewage Works - Sanitary Sewers and Related Pipes
GC-S-MC-3.4 <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure any existing or new sanitary sewer and related pipes ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Ministry of the Environment shall review and, if necessary, amend or prepare Environmental Compliance Approvals to ensure that appropriate terms and conditions are incorporated that when implemented, will reduce the risk to drinking water. The terms and conditions may include requirements for the proponent/applicant to undertake regular maintenance and inspections.
Sewage System or	Sewage Works - Discharge of Stormwater from a Stormwater Management Facility
GC-S-MC-3.5 <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure any existing or new discharge of stormwater from a stormwater management facility ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of the Environment shall prohibit this activity within the Environmental Compliance Approvals process.
6. The Application of Non-Agricultural Source Material (NASM) to Land	
GC-S-MC-4.1 <i>Future Prescribed Instr. WHPA-A-v.10</i> <i>Only applies to NASM containing material from a meat plant or sewage works</i>	To ensure the future application of non-agricultural source material to land never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or the Ministry of the Environment, as applicable, shall not approve this activity in a Non-Agricultural Source Material (NASM) Plan, in accordance with the <i>Nutrient Management Act</i> or an Environmental Compliance Approval in accordance with the <i>Environmental Protection Act</i> .
3. The Application of Agricultural Source Material to Land 4. The Handling and Storage of Agricultural Source Material 7. The Handling and Storage of Non-Agricultural Source Material (NASM) 8. The Application of Commercial Fertilizer to Land 9. The Handling and Storage of Commercial Fertilizer 10. The Application of Pesticides to Land 11. The Handling and Storage of Pesticides 21. The Use of Land as Livestock Grazing or Pasturing Land, an Outdoor Confinement Area or Farm Animal Yard	
GC-S-CW-5.1 <i>Existing/Future Part IV-RMP WHPA-A-v.10</i>	<p>To ensure the:</p> <ul style="list-style-type: none"> i. Existing and future application of pesticides to land; and ii. Existing handling and storage of pesticides <p>cease to be or never become a significant drinking water threat, where such activities are, or would be, significant drinking water threats, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required, except for residential properties.</p> <p>The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient</i></p>

Policy Number	Policies Addressing Prescribed Drinking Water Threats within The Township of Southgate
	Management Act, but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official.
GC-S-CW-5.2 <i>Existing/Future Part IV-Prohibit. WHPA-A-v.10</i> <i>Does not apply to application of commercial fertilizer in WHPA-A due to the percent managed land and livestock density calculation</i>	To ensure the: <ol style="list-style-type: none"> Existing and future application of agricultural source material to land; Existing and future storage and handling of agricultural source material; Existing and future storage and handling of non-agricultural source material; Existing and future application of commercial fertilizer to land; Existing and future storage and handling of commercial fertilizer; Existing and future handling and storage of pesticides; and Existing and future use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm animal yard <p>cease to be or never become significant drinking water threats, where such activities are, or would be, significant drinking water threats, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.</p>
GC-S-CW-5.3 <i>Existing/Future Education & Outreach WHPA-A-v.10</i>	To ensure the: <ol style="list-style-type: none"> Existing and future application of pesticides to land; and Existing handling and storage of pesticides <p>cease to be or never become a significant drinking water threat, where such activities are or would be significant drinking water threats on residential properties, the Township shall develop and implement an education and outreach program.</p> <p>Such a program may include, but not necessarily be limited to, increasing awareness and understanding of the drinking water threats and promotion of best management practices.</p>
13. The Handling and Storage of Road Salt 14. The Storage of Snow	
GC-S-CW-6.1 <i>Existing/Future Part IV-Prohibit. WHPA-A-v.10</i>	To ensure any existing or new facility for the handling and storage of road salt and the storage of snow cease to be or never become significant drinking water threats, where such activities are, or would be, significant drinking water threats, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
15. The Handling and Storage of Fuel	
GC-S-CW-7.1 <i>Existing/Future Education & Outreach WHPA-A-v.10</i>	To ensure the existing or future handling and storage of fuel equal to or less than 2,500 Litres ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Township shall develop and implement an education and outreach program outlining the requirements under the fuel oil code by the Technical Standards and Safety Authority and best management practices that could be implemented.
GC-S-CW-7.2 <i>Existing Part IV-RMP WHPA-A-v.10</i>	To ensure the existing handling and storage of fuel of more than 2,500 Litres ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. <p>For significant threats that are Technical Standards and Safety Authority regulated, the Risk Management Plan should be scoped to a contaminant management plan and any monitoring, reporting and auditing requirements provided to the Technical Standards and Safety Authority.</p>

Policy Number	Source Protection Plan Policies within the Townships of Amaranth and East Garafraxa
12. The Application of Road Salt 13. The Handling and Storage of Road Salt	
DC-AEG-CW-9.1 <i>Existing/Future Part IV- RMP ICA (CHL)</i>	<p>To ensure the existing and future application of road salt ceases to be or never becomes a significant drinking water threat where this activity is, or would be, a significant drinking water threat, excluding a single family residence, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. In the specific cases outlined below, the content shall be based upon, but not limited to, the following:</p> <ul style="list-style-type: none"> i) For un-assumed roads and private parking lots (excluding a single family residence), the Risk Management Plans shall include a goal to minimize salt usage through alternative measures, while maintaining public safety. ii) For public roads, the Risk Management Plans shall include provisions for: <ul style="list-style-type: none"> a) the reduction of salt usage through Best Management Practices such as alternative de-icer materials (with lower sodium and chloride) and/or contemporary technology; and b) the use of certified contractors for the application of road salt.
DC-AEG-NB-9.2 <i>Existing/Future Education&Outreach ICA (CHL)</i>	<p>To ensure the existing and future application of road salt ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Townships shall develop and implement an education and outreach program targeting those who apply road salt. The program will promote the importance of proper road salt application.</p> <p>Ministry of Environment in consultation with other provincial ministries and municipal associations should:</p> <ul style="list-style-type: none"> a) Promote Best Management Practices for the application of road salt, to protect sources of municipal drinking water. b) Should develop a licensing and accreditation program for Snow and Ice Contractors for the application of road salt, to protect sources of municipal drinking water.
DC-AEG-CW-9.3 <i>Existing/Future Part IV- RMP ICA (CHL)</i>	<p>To ensure the existing and future handling and storage of road salt ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.</p>
DC-AEG-NB-9.4 <i>Existing/Future Education & Outreach ICA (CHL)</i>	<p>To ensure the existing and future handling and storage of road salt ceases to be or never becomes a significant drinking water threat, where the activity is, or would be, a significant drinking water threat, the Ministry of Environment should develop and produce educational information targeted to all sectors, and locally distributed by the Townships to provide education and outreach to:</p> <ul style="list-style-type: none"> a) Residences and small businesses about the impact of salt on municipal drinking water and what they can do to reduce their use of salt; and b) Commercial and industrial sectors to address the importance of source protection planning and the impacts of road salt on drinking water sources, with the key message being responsible salt storage and application, and the use of contemporary technology.

Policy Number	Source Protection Plan Policies within the Townships of Amaranth and East Garafraxa
DC-AEG-NB-13.4 <i>Existing/Future Research</i> Local Area A WHPA-Q2	<p>To ensure any existing and future activity that reduces the recharge of an aquifer ceases to be or never becomes a significant drinking water threat, where the activity is or would be a significant threat within the Local Area A WHPA-Q2 within the Townships, and is a significant drinking water threat, the Ministry of the Environment, in consultation with the Townships, is encouraged to undertake an evaluation and analysis to identify research opportunities to develop plans and take appropriate actions to ensure the activity ceases to be or never becomes a significant drinking water threat and promote recharge on industrial lands industrial, commercial and institutional lands. This may include seeking partnerships for funding these research activities. If funding becomes available, future developments within the Local Area A WHPA-Q2 may be subject to the findings of this research and monitored for effectiveness.</p>
DC-AEG-NB-13.5 <i>Existing/Future Specify Action</i> Local Area A WHPA-Q1 WHPA-Q2	<p>To ensure any existing and future activity that takes water from an aquifer without returning the water to the same aquifer or that reduces the recharge of an aquifer ceases to be and/or never becomes a significant drinking water threat, where the activity is, or would be, a significant drinking water threat in WHPA-Q1 or WHPA-Q2, and where municipalities share a water source within a WHPA-Q1 or WHPA-Q2, the Ministry of the Environment, in collaboration with the Ministries of Infrastructure, Municipal Affairs and Housing, and Natural Resources, is encouraged to support municipal efforts that focus on finding collaborative and mutually beneficial solutions to address water servicing constraints.</p> <p>It is recommended to address existing and future significant drinking water quantity threats, that the Ministry of the Environment, in collaboration with other affected provincial ministries and other agencies, as required, initiate meetings with the municipalities that are wholly or partially within the City of Orangeville, Town of Mono and Township of Amaranth Local Area A identified as having significant water quantity Threats within one (1) year of the date the Source Protection Plan takes effect, to support the municipalities in developing mutually beneficial solutions to address water quantity constraints to ensure these activity cease to be or never becomes a significant drinking water threat.</p>
DC-AEG-MC-13.6 <i>Future Land Use Planning</i> Local Area A WHPA-Q2	<p>To ensure any existing and future activity that reduces the recharge of an aquifer ceases to be or never becomes a significant drinking water threat, where the activity is or would be a significant threat within WHPA-Q2, the County of Dufferin, in consultation with the lower tier municipalities, shall consider municipal water supply servicing constraints when approving settlement area expansions within WHPA-Q2.</p> <p>When considering settlement area expansions within the Local Area A, where an activity that reduces the recharge of an aquifer is or would be a significant drinking water threat, the Townships shall:</p> <ul style="list-style-type: none"> a) Examine municipal water supply servicing constraints; b) Seek early input from the province through the Ministry of Municipal Affairs and Housing; and c) Only support settlement area expansions, as part of a municipal comprehensive review, where the applicable provincial planning criteria have been met. <p>To ensure the activities never become a significant drinking water threat.</p>
DC-AEG-MC-13.7	<p>To ensure the existing or future activity that takes water from an aquifer without</p>

Policy Number	Source Protection Plan Policies within the Townships of Amaranth and East Garafraxa
<p>Existing/Future Specify Action WHPA-Q1</p>	<p>returning the water to the same aquifer ceases to be or never becomes a significant drinking water threat, where the activity is or would be a significant drinking water threat in WHPA-Q1, the Ministry of the Environment should adopt and fund the on-going maintenance of the Tier 3 numerical models, including:</p> <ul style="list-style-type: none"> a) Supporting environmental monitoring efforts to address data gaps and improve simulations of cumulative effects; and b) Incorporate new information as appropriate into the Tier 3 models to provide decision makers with a tool to make informed water management decisions. <p>Within Local Area A, where an activity reduces the recharge of an aquifer that would be a significant drinking water threat, the Townships, in collaboration with the Ministry of the Environment, are encouraged to examine municipal water supply when reviewing the available infrastructure during any municipal comprehensive review of settlement areas expansions to ensure the activity never becomes a significant drinking water threat.</p>
<p>DC-AEG-NB-13.8</p> <p>Future Specify Action Local Area A WHPA-Q2</p>	<p>To ensure any existing and future activity that reduces the recharge of an aquifer ceases to be or never becomes a significant drinking water threat, where the activity is or would be a significant threat within the WHPA-Q2, The County of Dufferin the Ministry of Infrastructure, in collaboration with the Ministry of Municipal Affairs and Housing and the Ministry of the Environment, should consider local water quantity availability when developing population and employment forecasts in municipalities that encompass Local Area A WHPA-Q2, where there is a significant threat to drinking water sources from activities which reduce the recharge of an aquifer to ensure the activity never becomes a significant drinking water threat.</p>
<p>DC-AEG-CW-13.9</p> <p>Existing/Future Specify Action Local Area A WHPA-Q1</p> <p>Monitoring</p>	<p>To ensure any existing and future activity that takes water from an aquifer without returning the water to the same aquifer ceases to be and/or never becomes a significant drinking water threat, where the activity is, or would be, a significant drinking water threat in WHPA-Q1, and where municipalities share a water source within WHPA-Q1, the municipalities shall develop a Joint Municipal Water Supply Management model within three (3) years of the Source Protection Plan taking effect to facilitate the planning and management of water supply sources.</p> <p>To ensure the protection of existing and future drinking water sources from the following prescribed drinking water threats:</p> <ul style="list-style-type: none"> i. An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body. ii. An activity that reduces the recharge of an aquifer. <p>The Dufferin County municipalities that share a water source within a Tier 3 Water Budget Local Area identified as having significant water quantity threats shall develop a Joint Municipal Water Supply Management model, and implement it within three (3) years of approval of the Source Protection Plan.</p> <p>The management model shall facilitate the planning and management of water supply sources to ensure sustainability of long term water supply in each municipality and ensure that water quantity is maintained or improved such that activities cease to be or do not become a significant drinking water quantity threat in the Local Area A.</p>

6.0 DUFFERIN COUNTY – TOWNSHIP OF MELANCTHON

The following Dufferin County, Township of Melancthon Source Protection Plan policies apply to the water systems located within the Township of Melancthon within the Grand River watershed and to vulnerable areas originating from other municipalities as presented in the following schedules. Reference shall be made to the Township of Southgate policies for the portions of the water supply systems located within those jurisdictions

- Schedule A: Township of Melancthon: Shelburne Water Supply
- Schedule B: Township of Melancthon: Groundwater Vulnerability Areas

6.1 Definitions

General definitions are provided in Volume I of the Source Protection Plan or in the *Clean Water Act, 2006*. Defined terms are intended to capture both the singular and plural of forms of these terms.

The following definitions shall apply to the Township of Melancthon Source Protection Policies.

Existing - means:

- a) a use, a building or structure that is used and continues to be used for the purpose for which it was erected;
- b) a minor alteration or replacement building or structure that has the same capacity as an existing lawful building or structure and provides greater protection to sources of drinking water and where there is no change in use and where the replacement structure will bring the building or structure into closer conformity with the Source Protection Plan;
- c) an activity that is presently occurring or has occurred within the last ten years from the date of approval of the source protection plan; or
- d) where an existing activity is permitted an expansion, alteration or replacement of a use, activity, building or structure that reduces the risk of contaminating drinking water shall be permitted.

New or Future - means not existing, as defined herein.

- a) a new building or structure at a location in a vulnerable area that commences after the Source Protection Plan takes effect;
- b) new structures or buildings for a new land use that did not exist on the day before the Source Protection Plan comes into effect;
- c) an activity that has not occurred within the last ten years from the date of the approval of the Source Protection Plan;
- d) new agricultural activities on lands that had not been previously used or zoned for any agricultural purposes in the past ten years within vulnerable areas;
- e) an expansion, alteration or replacement of a use, activity, building or structure that does not reduce the risk of contaminating drinking water is considered a future activity and subject to the future policy.

Township – means the Corporation of the Township of Melancthon.

6.2 Township of Melancthon Source Protection Plan Policies

Policy Number	Source Protection Plan Policies within the Town of Grand Valley
Implementation and Timing	
DC-M-CW-1.1 <i>Implement. & Timing</i>	<p>Except as set out below, the policies contained in this Source Protection Plan shall take effect on the effective date set by the Minister.</p> <ul style="list-style-type: none"> g. For Section 57 of the <i>Clean Water Act, 2006</i>, if an activity was engaged in at a particular location before this Source Protection Plan took effect, policies regarding prohibited activities do not apply to a person who engages in the activity at that location until 180 days from the date the Source Protection Plan takes effect; h. For Section 58 of the <i>Clean Water Act, 2006</i>, if an activity was engaged in at a particular location before this Source Protection Plan took effect and the Risk Management Official gives notice to a person who is engaged in the activity at that location that, in the opinion of the Risk Management Official, policies regarding regulated activities should apply to the person who engages in the activity at that location on and after a date specified in the notice that is at least 120 days after the date of the notice; i. For Section 59 of the <i>Clean Water Act, 2006</i>, policies regarding restricted land uses shall take effect the same day the Source Protection Plan takes effect; j. Where the Source Protection Policies require the Town to develop and implement education and outreach programs as the primary tool for managing or eliminating a particular significant threat and where they are deemed necessary and/or appropriate by the Town and subject to available funding, such programs shall be developed and implemented within five (5) years from the date the Source Protection Plan takes effect; k. For Sections 43 of the <i>Clean Water Act, 2006</i>, if an activity was engaged in at a particular location before this Source Protection Plan took effect, amendments to Prescribed Instruments shall be completed within three (3) years from the date the Source Protection Plan takes effect. l. For Section 40 and 42 of the <i>Clean Water Act, 2006</i>, the Official Plan and Zoning By-Laws must be amended to conform with the significant threat policies and adopted by municipal council by the next five (5) year Official Plan update as required under subsection 26(1) of the <i>Planning Act</i> or within five (5) years from the date the Source Protection Plan takes effect.
Uses and Areas Designated as Restricted Land Use	
DC-M-CW-1.2 <i>Part IV-RLU</i>	<p>In accordance with Section 59 of the <i>Clean Water Act, 2006</i>, all land uses, except solely residential uses, where significant drinking water threat activities have been designated for the purposes of Section 57 and 58 of the <i>Clean Water Act, 2006</i> are hereby designated as Restricted Land Uses and a written notice from the Risk Management Official is required prior to approval of any Building Permit, <i>Planning Act</i> or <i>Condominium Act</i> application.</p> <p>Despite the above policy, a site specific proposed land use that is the subject of an application for an approval under the <i>Planning Act</i> (as prescribed in O. Reg. 287/07 Section 62), or for a permit under the <i>Building Code Act</i>, is not designated for the purpose of Section 59 if the applicant can demonstrate to the satisfaction of the planning authority or the building official, as the case may be, that a significant drinking water threat activity designated for the purposes of Section 57 or 58 will not be engaged in.</p>
Official Plan and Zoning By-law Amendment(s) Policies	

Policy Number	Source Protection Plan Policies within the Town of Grand Valley
DC-M-MC-1.3 <i>Future Land Use Planning</i>	The Township and County of Dufferin, where applicable, shall amend their Official Plan and/or Zoning By-Laws to: <ul style="list-style-type: none"> d. Identify the vulnerable areas in which drinking water threats prescribed under the <i>Clean Water Act</i>, 2006 would be significant; e. Indicate that within the areas identified, any use or activity that is, or would be, a significant drinking water threat is required to conform with all applicable Source Protection Plan policies and, as such, may be prohibited, restricted or otherwise regulated by those policies; and f. Incorporate any other amendments required to conform with the threat specific land use policies identified in this Source Protection Plan. g.
Education and Outreach Programs	
DC-M-CW-1.4 <i>Existing/ Future Education & Outreach</i>	The Township, in collaboration with Conservation Authorities and other bodies where possible, may develop and implement education and outreach programs directed at any, or all, significant drinking water threats prescribed under the <i>Clean Water Act</i> , 2006, where such programs are deemed necessary and/or appropriate by the Township and subject to available funding. Such programs may include, but not necessarily be limited to, increasing awareness and understanding of significant drinking water threats and promotion of best management practices.
Incentive Programs	
DC-M-CW-1.5 <i>Existing/ Future Incentive</i>	The Township, in collaboration with other bodies and levels of government where possible, may develop and implement incentive programs directed at various significant threat activities prescribed under the <i>Clean Water Act</i> , 2006, where such programs are deemed necessary and/or appropriate by the Town, subject to available funding.
DC-M-NB-1.6 <i>Existing/ Future Incentive</i>	The Ministry of Environment and other provincial ministries shall consider providing continued funding and support to protect existing and future drinking water sources and address significant drinking water threats, under the Ontario Drinking Water Stewardship Program.
DC-M-NB-1.7 <i>Existing Incentive</i>	To reduce the risks to drinking water from an existing activity, the Grand River Conservation Authority, in consultation with the Township and/or County, will deliver available cost share incentive programs as long as the Grand River Conservation Authority has such programs and outreach staff available, and work with affected land owners to implement best management practices for the following activities: <ul style="list-style-type: none"> iv. The application of agricultural source material to land v. The storage of agricultural source material vi. The use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm-animal yard.
Annual Reporting	
DC-M-CW-1.8 <i>Monitoring</i>	The Township shall provide a report to the Source Protection Authority, by February 1 st of each year, summarizing the actions taken to implement the Source Protection Plan Policies.
DC-M-CW-1.9 <i>Monitoring</i>	Where the Township and County of Dufferin is required to amend their Official Plan and/or Zoning By-law and provide proof of compliance to the Source Protection Authority, they shall do so within 30 days of final approval of the amendment(s) or, where the matter has been appealed to the Ontario Municipal

Policy Number	Source Protection Plan Policies within the Town of Grand Valley
	Board, the date of their decision to approve.
DC-M-CW-1.10 <i>Monitoring</i>	The Risk Management Official shall provide a report to the Source Protection Authority, by February 1 st of each year, summarizing the actions taken by the Risk Management Official to implement the Source Protection Policies, in accordance with the <i>Clean Water Act, 2006</i> and associated regulations.
DC-M-CW-1.11 <i>Monitoring</i>	Where the Source Protection Plan policies require a provincial ministry to amend a Prescribed Instrument or the issuance of a new prescribed instrument, the applicable Ministry shall provide a summary of the actions taken the previous year to implement the policies and provide a written report summarizing this information to the Source Protection Authority by February 1 st of each year.
DC-M-CW-1.12 <i>Monitoring</i>	Where the Source Protection Plan policies require a provincial ministry to deny an activity with a Prescribed Instrument, the applicable Ministry shall document the number and locations where such instruments were denied and provide a summary of the actions taken to the Source Protection Authority by February 1 st of each year.
Local Threat: The Conveyance of Oil by way of Underground Pipelines	
DC-M-NB-1.13 <i>Future Specify Action</i> <i>WHPA-A-v.10</i> <i>WHPA-B-v.10</i> <i>Monitoring</i>	<p>To reduce the risks to drinking water due to the conveyance of oil by way of underground pipeline within the meaning of O. Reg. 210/01 under the <i>Technical Safety and Standards Act</i> or is subject to the <i>National Energy Board Act</i>, where the activity would be a significant drinking water threat, the pipeline proponent, the National Energy Board, and Ontario Energy Board, are encouraged to provide the Source Protection Authority and the Town the location of any new proposed pipeline within the Township and/or Source Protection Area.</p> <p>The Source Protection Authority shall document in the annual report the number of new pipelines proposed within vulnerable areas if a pipeline has been proposed and/or an application has been received.</p>
Strategic Action	
Spill Prevention, Spill Contingency or Emergency Response Plans	
DC-M-NB-1.16 <i>Future Specify Action</i>	To ensure the protection of drinking water sources with respect to spills that occur within a wellhead protection area along highways, railway lines, or shipping lanes, the Township, County of Dufferin, and the Ministry of the Environment are encouraged to incorporate the Wellhead Protection Area mapping into their Emergency Response Plan and Spills Action Centre mapping, respectively.
Transport Pathways	
DC-M-NB-1.17 <i>Existing/Future Specify Action</i>	The Township is requested to support ongoing programs, which encourage the decommissioning of abandoned wells as per O. Reg. 903, within all vulnerable areas where there is or would be a significant drinking water threat.
Interpretation	
DC-M-CW-1.18 <i>Interpretation of Source Protection Plan</i>	<p>The Source Protection Plan provides policies to meet the objectives of the <i>Clean Water Act, 2006</i>. The Source Protection Plan consists of the written policy text and Schedules.</p> <p>c) The Schedules in the Source Protection Plan identify the areas where the policies of the Source Protection Plan apply. The boundaries for the circumstances shown on the Plan Schedules are general. More detailed interpretation of the boundaries relies on the mapping in the approved Assessment Report and the Specific Circumstances found in the Tables of Drinking Water Threats, <i>Clean Water Act, 2006</i>.</p>

Policy Number	Source Protection Plan Policies within the Town of Grand Valley
	d) Where any Act or portion of an Act of the Ontario Government or Canadian Government is referenced in this Plan, such reference shall be interpreted to refer to any subsequent renaming of sections in the Act as well as any subsequent amendments to the Act, or successor thereof. This provision is also applicable to any policy statement, regulation or guideline issued by the Province or the municipality. No provision of this Plan shall derogate from any applicable law.
Transition Provision	
DC-M-CW-1.18	Where a policy in this plan prohibits a "future" threat activity, the policy for managing "existing" drinking water threats activities applies in the following cases even though those activities will commence after the Source Protection Plan comes into effect:
Transition	<ol style="list-style-type: none"> 1) A drinking water threat activity that is related to a development proposal where a complete application was made under the Planning Act or Condominium Act prior to the day the Source Protection Plan comes into effect. The policy for "existing" drinking water threats also applies to any further applications required under the Planning Act, Condominium Act, or prescribed instruments to implement the development proposal. 2) A drinking water threat activity that is related to an application for a Building Permit, which has been submitted in compliance with Division C 1.3.1.3 (5) of the Ontario Building Code Act or a development permit under the Niagara Escarpment Development Control Area prior to the day the Source Protection Plan comes into effect. 3) A drinking water threat activity that is related to an application made for the issuance or amendment of a prescribed instrument prior to the day the source protection plan comes into effect.

6.3 Policies Addressing Prescribed Drinking Water Threats

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
1. Establishment, Operation or Maintenance of a Waste Disposal Site, within the Meaning of Part V of the <i>Environmental Protection Act</i>	
Application of Untreated Spetage	
DC-M-MC-2.1	To ensure any existing or future application of untreated septage to land, that is subject to an Environmental Compliance Approval within the meaning of the <i>Environmental Protection Act</i> , ceases to be, or never becomes, a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Ministry of Environment shall prohibit these activities within the Environmental Compliance Approvals process.
Existing/Future Prescribed Instr. WHPA ≥ 8	
Waste Disposal Sites	
DC-M-CW-2.2	To ensure any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> which does not require an Environmental Compliance Approval (PCB waste storage and the storage of hazardous liquid industrial waste, excluding the storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste (O.Reg 347)), ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.
Existing Part IV-RMP WHPA ≥ 8	

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
	The risk management plan, at a minimum, will be based on contemporary standards, and include appropriate terms and conditions to ensure the activity ceases to be a significant drinking water threat.
DC-M-MC-2.3 Future Prescribed Instr. WHPA ≥ 8	To ensure the establishment, operation or maintenance of a new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> that is subject to an Environmental Compliance Approval never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Ministry of the Environment shall prohibit these activities within the Environmental Compliance Approvals process.
DC-M-CW-2.4 Future Part IV-Prohibit WHPA ≥ 8	To ensure the establishment, operation or maintenance of a new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> which does not require an Environmental Compliance Approval (PCB waste storage and the storage of hazardous liquid industrial waste, excluding the storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste (O.Reg 347)), never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, is designated for the purpose of Section 57 of the Clean Water Act, and shall be prohibited.
DC-M-MC-2.5 Existing Prescribed Instr. WHPA ≥ 8	To ensure any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> that is subject to an Environmental Compliance Approval ceases to be a significant drinking water threat, the Ministry of Environment shall review and if necessary, amend Environmental Compliance Approvals to ensure that appropriate terms and conditions are incorporated that, when implemented, ensure that the waste disposal site is managed to reduce the risk to drinking water sources.
DC-M-MC-2.6 Future Land Use Planning WHPA ≥ 8	To ensure the establishment of a new waste disposal site within the meaning of Part IV of the <i>Environmental Protection Act</i> (excluding storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste (O.Reg 347) and storage of hazardous or liquid industrial waste) never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amend their planning documents to prohibit a related land use.
DC-M-CW-2.7 Existing Education&Outreach WHPA ≥ 8	The Township, in collaboration with Conservation Authorities and other bodies wherever possible, shall develop and implement education and outreach programs to address any existing waste disposal sites, within the meaning of Part V of the <i>Environmental Protection Act</i> , including the storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, (O. Reg. 347), where this activity is a significant drinking water threat, that do not require an Environmental Compliance Approval. The program should focus on the proper handling, storage and disposal of wastes to ensure that these activities cease to be significant drinking water threats.
Disposal of Mine Tailings	
DC-M-MC-2.8	To ensure the existing disposal of mine tailings, that is subject to an Environmental Compliance Approval within the meaning of the <i>Environmental Protection Act</i> , ceases to be a significant drinking water threat the Ministry of Environment shall ensure that the Environmental Compliance Approval that governs the disposal of mine tailings includes appropriate terms and conditions to ensure that the activity ceases to be a significant drinking water threat.

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
DC-M-MC-2.9	To ensure the future disposal of mine tailings, that is subject to an Environmental Compliance Approval within the meaning of the Environmental Protection Act, never becomes a significant drinking water threat the Ministry of Environment shall prohibit this activity within the Environmental Compliance Approvals process.
2. Establishment, Operation or Maintenance of a System That Collects, Stores, Transmits, Treats or Disposes of Sewage	
DC-M-MC-3.1 <i>Future Land Use Planning</i>	To ensure the establishment, operation or maintenance system that collects, stores, transmits, treats or disposes of sewage never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat the Township and the County of Dufferin, where applicable, shall amend their planning documents to locate new (private or municipal) sewage system infrastructure, wherever possible, outside of a vulnerable area where it would be a significant drinking water threat.
DC-M-CW-3.2 <i>Existing/Future Education&Outreach</i>	The Township, in collaboration with Conservation Authorities and other bodies wherever possible, shall develop and implement education and outreach programs to address any existing system that collects, stores or transmits, treats or disposes of sewage, where such an activity is a significant drinking water threat. The program will promote the importance of source water protection, the proper disposal of hazardous waste and proper care and maintenance of septic systems.
Sewage System or Sewage Works - Septic System and Septic System Holding Tanks	
DC-M-CW-3.3 <i>Existing/Future Specify Action WHPA-A-v.10</i>	To ensure any existing or new sewage system with a design flow of less than or equal to 10,000 Litres per day and regulated under the <i>Ontario Building Code Act</i> or the <i>Ontario Water Resources Act</i> ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the County of Dufferin shall implement an on-site sewage system maintenance inspection program. Inspections should be prioritized based on the proximity to the drinking water supply.
DC-M-MC-3.4 <i>Existing Prescribed Instr. WHPA-A-v.10</i>	<p>To ensure any existing sewage system with a design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act</i> ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Ministry of the Environment shall review or prepare and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, ensure that these septic systems are managed to reduce the risk to municipal drinking water sources.</p> <p>The terms and conditions may include, as appropriate, requirements for the proponent/applicant to undertake mandatory monitoring of groundwater impacts, contingencies in the event that drinking water quality is adversely affected, regular and ongoing compliance monitoring, mandatory system inspections at least every five (5) years, and upgrading of these septic systems to current standards, if necessary. In addition, the terms and conditions may include the proponent/applicant to provide annual reporting to the Source Protection Authority and County of any monitoring and inspection programs required and their results.</p>

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
DC-M-MC-3.5 <i>Future Prescribed Instr.</i> WHPA-A-v.10	To ensure new sewage system with a design flow greater than 10,000 Litres per day and regulated by the Ontario Water Resources Act never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Ministry of Environment shall prohibit this activity within the Environmental Compliance Approvals process.
DC-M-MC-3.6 <i>Future Land Use Planning</i>	To ensure new sewage system with a design flow greater than 10,000 Litres per day and regulated by the Ontario Water Resources Act never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amend their planning documents to prohibit a related land use.
DC-M-MC-3.7 <i>Future Land Use Planning</i>	To ensure new small on-site sewage systems never become a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall permit new development, only where the lot sizes for any proposed development that would include a small on-site sewage treatment system is based on the most current version of the Ministry of Environment's guidelines for individual on-site servicing. Lots of record that exist on the effective date of the source protection plan are exempted.
Sewage System or Sewage Works - Storage of Sewage (e.g., treatment plant tanks) Sewage System or Sewage Works - Sewage Treatment Plant Effluent Discharges Sewage System or Sewage Works - Sanitary Sewers and Related Pipes Sewage System or Sewage Works - Sewage Treatment Plant By-pass Discharge to Surface Water	
DC-M-MC-3.8 <i>Existing Prescribed Instr.</i> WHPA-A-v.10 WHPA-B-v.8	To ensure any existing sewage treatment plant, sanitary sewers and related pipes, sewage treatment plant by-pass discharge to surface water, and sewage treatment plant effluent discharge (including lagoons) cease to be significant drinking water threats, where such activities are significant drinking water threats, the Ministry of the Environment shall ensure that the Environmental Compliance Approval that governs these activities includes appropriate terms and conditions to ensure that the activity ceases to be a significant drinking water threat.
DC-M-MC-3.9 <i>Future Prescribed Instr.</i> WHPA-A-v.10 WHPA-B-v.8	To ensure any future establishment, operation or maintenance of a sewage treatment plant, sewage treatment plant by-pass discharge to surface water, and sewage treatment plant effluent discharge (including lagoons) never become significant drinking water threats, where such activities would be significant drinking water threats, the Ministry of Environment shall prohibit these activities within the Environmental Compliance Approvals Process.
DC-M-MC-3.10 <i>Future Prescribed Instr.</i> WHPA-A-v.10 WHPA-B-v.8	To ensure the future establishment, operation or maintenance of sanitary sewers and related pipes never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Ministry of Environment incorporate appropriate terms and conditions into the Environmental Compliance Approval to ensure the activity does not become a significant drinking water threat.
Sewage System or Sewage Works - Discharge of Stormwater from a Stormwater Management Facility	
DC-M-MC-3.11 <i>Existing/Future Prescribed Instr.</i> WHPA-A-v.10	To ensure any existing or future establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of stormwater, cease to be or never becomes a significant drinking water threat, where such an activity are, or would be, a significant drinking water threat, the Ministry of the Environment shall review or prepare and, if necessary, amend Environmental

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
	<p>Compliance Approvals to ensure that appropriate terms and conditions are incorporated that, when implemented, will ensure that the activity ceases to be or does not become a significant drinking water threat. Such conditions may include:</p> <ol style="list-style-type: none"> 1) permitting the expansion of an existing facility where the expansion does not pose a significant drinking water threat; or 2) permitting retrofits to existing facilities where the retrofit will discharge the stormwater outside of the significant drinking water threat area.
DC-M-MC-3.12 Future Land Use Planning	<p>To ensure the future establishment of a system that collects, stores, transmits, treats or disposes of stormwater, never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and County of Dufferin, where applicable, shall amend their planning documents to ensure the design of new stormwater management facilities reduces the risk of contaminating drinking water, and directs the discharge of stormwater outside of vulnerable areas.</p>
3. The Application of Agricultural Source Material to Land	
DC-M-CW-4.1 Existing/Future Part IV-Prohibit WHPA-A-v.10	<p>To ensure the existing or future application of agricultural source material to land, where the Nutrient Management Act does not require an approval, ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, this activity is designated for the purpose of Section 57 of the Clean Water Act and shall be prohibited.</p>
DC-M-MC-4.2 Existing/Future Prescribed Instr. WHPA-A-v.10	<p>To ensure the existing or future application of agricultural source material to land, for those phased in under the Nutrient Management Act, ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall prohibit this activity to ensure it never becomes a significant drinking water threat.</p>
DC-M-CW-4.3 Existing Education&Outreach WHPA-A-v.10	<p>To ensure the existing application of agricultural source material to land ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target those applying agricultural source material to land.</p>
4. The Storage of Agricultural Source Material	
DC-M-CW-5.1 Existing Part IV-RMP WHPA-A-v.10	<p>To ensure the existing storage of agricultural source material, for those not phased in under the Nutrient Management Act, ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the Clean Water Act and a Risk Management Plan shall be required.</p> <p>The risk management plan, at a minimum, will be based on contemporary standards, reflect appropriate nutrient management practices, and ensure the activity ceases to be a significant drinking water threat.</p>
DC-M-MC-5.2 Existing Prescribed Instr.	<p>To ensure the existing storage of agricultural source material, for those phased in under the Nutrient Management Act, ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall ensure that the nutrient management</p>

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
WHPA-A-v.10	plan or strategy that governs the storage of agricultural source materials include appropriate terms and conditions to ensure that the activity ceases to be a significant drinking water threat.
DC-M-CW-5.3 Future Part IV – Prohibit WHPA-A-v.10	To ensure the future storage of agricultural source material, for those not phased in under the Nutrient Management Act, never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, it shall be designated for the purposes of Section 57 and shall be prohibited.
DC-M-MC-5.4 Future Prescribed Instr. WHPA-A-v.10	To ensure the future storage of agricultural source material, for those phased in under the Nutrient Management Act, never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall prohibit this activity to ensure it never becomes a significant drinking water threat.
DC-M-MC-5.5 Future Land Use Planning WHPA-A-v.10	To ensure the future storage of agricultural source material never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township, and the County of Dufferin, where applicable, shall amended planning documents to prohibit future agricultural source material storage facilities.
DC-M-CW-5.6 Existing Education&Outreach WHPA-A-v.10	To ensure the existing handling and storage of agricultural source material ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target those handling or storing agricultural source material.
6. The Application of Non-Agricultural Source Material (NASM)	
7. The Handling and Storage of Non-Agricultural Source Material (NASM)	
DC-M-CW-6.1 Existing/Future Part IV – Prohibit WHPA-A-v.10	To ensure the existing and future application, or handling and storage of category 1 non-agricultural source material, where the Nutrient Management Act and Environmental Protection Act do not require an approval, ceases to be, or never becomes, a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 57 of the Clean Water Act, and is therefore prohibited.
DC-M-MC-6.2 Existing/Future Prescribed Instr. WHPA-A-v.10	To ensure the existing and future application, or handling and storage of category 1, 2 or 3 non-agricultural source material, where the Nutrient Management Act and Environmental Protection Act requires an approval, ceases to be, or never becomes, a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs and/or the Ministry of Environment shall prohibit this activity through the Environmental Compliance Approvals process.
DC-M-MC-6.3 Future Land Use Planning WHPA-A-v.10	To ensure the future storage of non-agricultural source material never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future non-agricultural source material storage facilities.
DC-M-CW-6.4	To ensure the existing application, handling or storage of non-agricultural source material ceases to be a significant drinking water threat, where this activity is a

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
Existing Education & Outreach WHPA-A-v.10	significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target those applying, handling or storing non-agricultural source material.
8. The Application of Commercial Fertilizer to Land	
DC-M-CW-7.1 Existing/Future Part IV – RMP WHPA-A-v.10	<p>To ensure the existing and future application of commercial fertilizer to land, for those not phased in under the Nutrient Management Act, ceases to be, or never becomes, a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the Clean Water Act and a Risk Management Plan shall be required.</p> <p>The risk management plan shall require fertilizers to be applied using best agronomic practices on the advice of a certified crop advisor, that soil tests (NPK) be carried out and that proper farm practices regarding crop rotation be applied, as appropriate.</p>
DC-M-MC-7.2 Existing/Future Prescribed Instr. WHPA-A-v.10	To ensure the existing and future application of commercial fertilizer to land, for those phased in under the Nutrient Management Act, ceases to be, or never becomes, a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall ensure that the nutrient management plan or strategy that governs the application of commercial fertilizer to land includes appropriate terms and conditions to ensure that the activity ceases to be or does not become a significant drinking water threat.
DC-M-CW-7.3 Existing Education & Outreach WHPA-A-v.10	To ensure the existing and future application of commercial fertilizer to land ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target those applying commercial fertilizer to land.
9. The Handling and Storage of Commercial Fertilizer	
DC-M-CW-8.1 Existing Part IV – RMP WHPA-A-v.10	<p>To ensure the existing handling and storage of commercial fertilizer, for those not phased in under the Nutrient Management Act, ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the Clean Water Act and a Risk Management Plan shall be required.</p> <p>The risk management plan, at a minimum, will be based on contemporary standards and shall require:</p> <ol style="list-style-type: none"> 1) liquid fertilizer to be stored in double-walled tanks or secondary containment facilities, with collision protection, 2) dry fertilizer to be stored undercover on impervious floor surfaces with no drainage outlets so that the handling and storage of commercial fertilizer ceases to be a significant drinking water threat.
DC-M-CW-8.2 Future Part IV – Prohibit WHPA-A-v.10	To ensure the future handling and storage of commercial fertilizer never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the Clean Water Act, and is therefore prohibited.

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
DC-M-MC-8.3 <i>Future Land Use Planning WHPA-A-v.10</i>	To ensure the future storage of commercial fertilizer never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future commercial fertilizer storage facilities.
DC-M-CW-8.4 <i>Existing Education&Outreach WHPA-A-v.10</i>	To ensure the existing handling and storage of commercial fertilizer ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target those handling or storing commercial fertilizer.
10. The Application of Pesticides to Land	
DC-M-CW-9.1 <i>Existing/Future Part IV – RMP WHPA-A-v.10</i>	<p>To ensure the existing and future application of pesticides to land ceases to be, or never becomes, a significant drinking water threat, where such an activity is, or would be a significant drinking water threat, it shall be designated for the purpose of Section 58 of the Clean Water Act and a Risk Management Plan shall be required.</p> <p>The risk management plan, at a minimum, will be based on contemporary standards, and shall require that pesticides be applied by a certified or registered professional in keeping with prescribed label rates to ensure that the activity ceases to be or does not become a significant drinking water threat.</p>
DC-M-CW-9.2 <i>Existing/Future Education&Outreach WHPA-A-v.10</i>	To ensure the existing application of pesticide to land ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target those applying pesticide to land.
11. The Handling and Storage of Pesticides	
DC-M-CW-10.1 <i>Existing Part IV – RMP WHPA-A-v.10</i>	<p>To ensure the existing handling and storage of pesticides ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the Clean Water Act and a Risk Management Plan shall be required.</p> <p>The risk management plan, at a minimum, will be based on contemporary standards and include appropriate terms and conditions to ensure the activity ceases to be a significant drinking water threat.</p>
DC-M-CW-10.2 <i>Future Part IV – Prohibit WHPA-A-v.10</i>	To ensure the future handling and storage of pesticides never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the Clean Water Act and is therefore prohibited.
DC-M-MC-10.3 <i>Future Land Use Planning WHPA-A-v.10</i>	To ensure the future storage of pesticides never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future pesticide storage facilities.
DC-M-CW-10.4	To ensure the existing handling and storage of pesticides ceases to be a

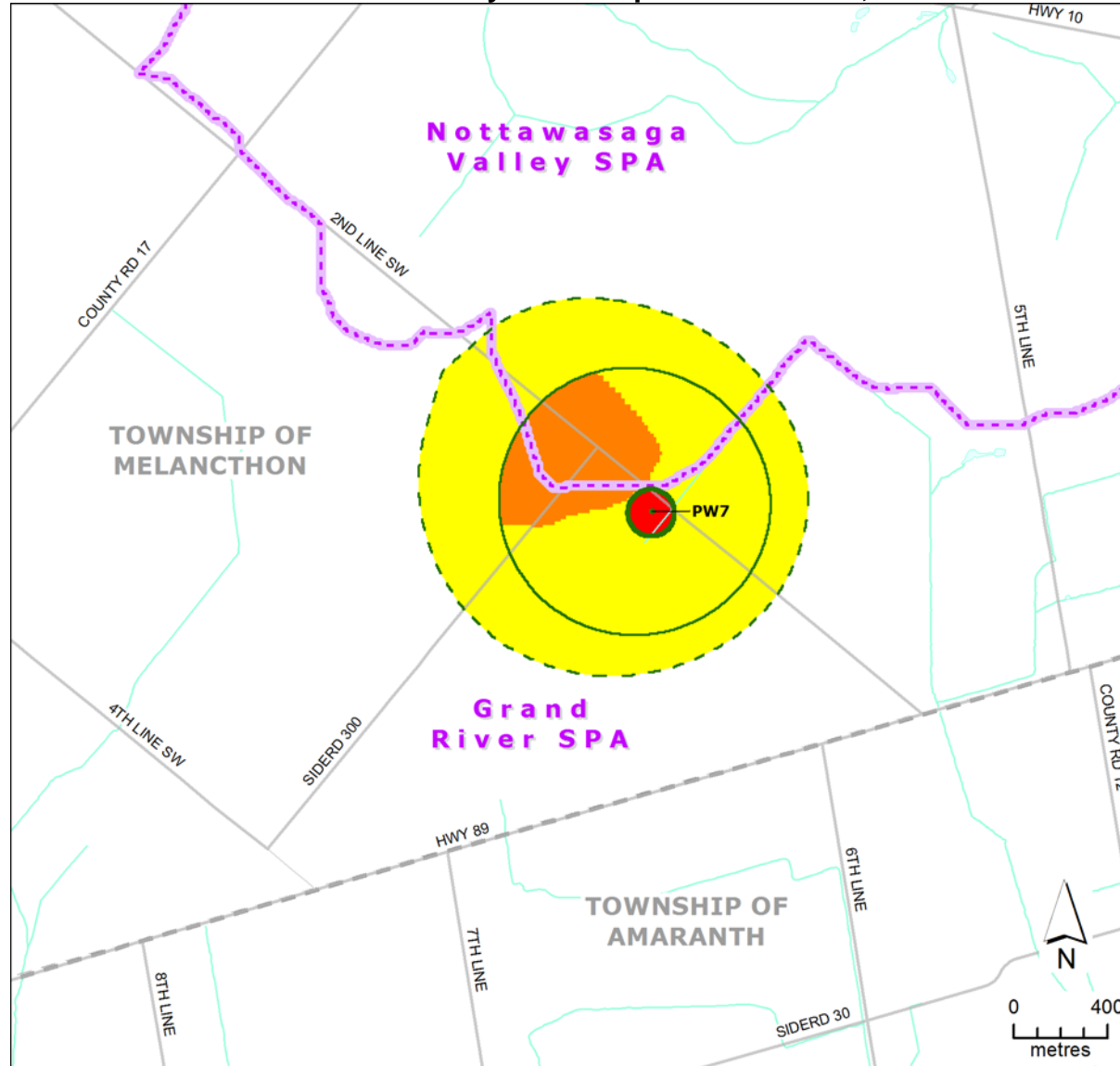
Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
Existing Education & Outreach WHPA-A-v.10	significant drinking water threat, where this activity is a significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target those handling or storing pesticides.
13. The Handling and Storage of Road Salt 14. The Storage of Snow	
DC-M-CW-11.1 Existing Part IV-RMP WHPA-A-v.10	<p>To ensure the existing handling and storage of road salt and storage of snow ceases to be a significant drinking water threat, where such an activity would be a significant drinking water threat, it shall be designated for the purpose of Section 58 of the Clean Water Act and a Risk Management Plan shall be required.</p> <p>A risk management plan for the handling and storage of road salt, at a minimum, will include terms and conditions that mirror a salt management plan, and comply with contemporary standards to ensure the handling and storage of road salt ceases to be a significant drinking water threat.</p> <p>A risk management plan for the storage of snow, at a minimum, will be based on contemporary standards and shall ensure that the storage of snow and associated run-off ceases to be a significant drinking water threat.</p>
DC-M-CW-11.2 Future Part IV-Prohibit WHPA-A-v.10	To ensure the future handling and storage of road salt and storage of snow never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the Clean Water Act and is therefore prohibited to ensure this activity ceases to be a significant drinking water threat. Except in emergency situations as determined by the risk management official and the public works department, emergency snow storage will be permitted only outside of WHPA-A.
DC-M-MC-11.3 Future Land Use Planning WHPA-A-v.10	To ensure the future storage of road salt never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future road salt storage facilities.
DC-M-MC-11.4 Future Land Use Planning WHPA-A-v.10	To ensure the future storage snow never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future snow storage facilities.
DC-M-CW-11.5 Existing/Future Education & Outreach WHPA-A-v.10	The Township in collaboration with conservation authorities shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target the handling and storage or road salt and snow where this activity would be a significant drinking water threat. The program will promote pollution prevention by explaining the importance of proper salt storage and run-off management of salt and snow to safe guard water supplies. The program will be carried out in consultation with the Association of Municipalities Ontario and the Ontario Good Roads Association.
15. The Handling and Storage of Fuel	
DC-M-CW-12.1 Existing Education & Outreach	To ensure the existing handling and storage of fuel less ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, the Township shall develop and implement an education and outreach program outlining the requirements of proper maintenance for fuel storage and the steps to

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
WHPA-A-v.10	be taken if there is a spill or leak detected.
DC-M-CW-12.2 Existing Part IV-RMP WHPA-A-v.10	<p>To ensure the existing handling and storage of fuel, except for personal domestic use, ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.</p> <p>The risk management plan will include appropriate terms and conditions to ensure the handling and storage of fuel ceases to be a significant drinking water threat, and at a minimum, complies with contemporary standards. The risk management plan may include such conditions as:</p> <ol style="list-style-type: none"> 1) secondary containment 2) spill/leak detection (monitoring processes) 3) collision protection (bollards)
DC-M-CW-12.3 Future Part IV-Prohibit WHPA-A-v.10	To ensure any future handling and storage of fuel never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
DC-M-MC-12.4 Future Land Use Planning WHPA-A-v.10	To ensure the future storage fuel never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future fuel storage facilities.
16. The Handling and Storage of a Dense Non-Aqueous Phase Liquid (DNAPL)	
DC-M-CW-13.1 Existing Part IV-RMP WHPA-A/B/C	<p>To ensure the existing handling and storage of a dense non-aqueous phase liquid (excluding incidental volumes for personal/domestic use) ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.</p> <p>The risk management plan, at a minimum, will promote above-ground storage and handling, and include terms and conditions to ensure the handling and storage of DNAPLs ceases to be a significant drinking water threat.</p>
DC-M-CW-13.2 Future Part IV-Prohibit WHPA-A/B/C	To ensure the future handling and storage of a dense non-aqueous phase liquid (excluding incidental volumes for personal/domestic use) never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, this activity shall be designated for the purposes of Section 57 of the <i>Clean Water Act</i> , and is therefore prohibited.
DC-M-MC-13.3 Future Land Use Planning WHPA-A-v.10	To ensure the future storage of dense non-aqueous phase liquid never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future dense non-aqueous phase liquid storage facilities.
DC-M-CW-13.4 Existing Education & Outreach	To ensure any existing facility storing and handling a dense non-aqueous phase liquid ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, the Township shall develop and implement an

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
WHPA-A/B/C	education and outreach program to encourage the use of alternative products, where available, and the proper handling/storage and disposal procedures for these products.
17. The Handling and Storage of an Organic Solvent	
DC-M-CW-14.1 Existing Part IV-RMP WHPA-A-v.10	To ensure any existing handling and storage of an organic solvent ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required. The risk management plan, at a minimum, will be based on contemporary standards and include appropriate terms and conditions to ensure the activity ceases to be a significant drinking water threat.
DC-M-CW-14.2 Future Part IV-Prohibit WHPA-A-v.10	To ensure any new handling and storage of an organic solvent never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, this activity is designated for the purpose of Section 57 of the <i>Clean Water Act</i> , 2006 and shall be prohibited.
DC-M-MC-14.3 Future Land Use Planning WHPA-A-v.10	To ensure the future storage of organic solvents never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future organic solvent storage facilities.
DC-M-CW-14.4 Existing Education & Outreach WHPA-A-v.10	To ensure any existing facility storing and handling an organic solvent ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, the Township shall develop and implement an education and outreach program to encourage the use of alternative products, where available, and the proper handling/storage and disposal procedures for these products.
18. The Management of Runoff that Contains Chemicals Used in De-icing of Aircraft	
DC-M-CW-15.1 Future Specify Action WHPA-A-v.10	To ensure that future runoff containing de-icing chemical never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the airport authority, in their consideration of any new airport facilities are encouraged to include appropriate design standards and management practices to prevent run-off from airport de-icing facilities from becoming a significant drinking water threat.
21. The use of land as livestock grazing, or pasturing land, an outdoor confinement area or farm animal yard. O.Reg. 385/08, s.3.	
DC-M-MC-16.1 Existing/Future Prescribed Instr. WHPA-A-v.10	To ensure any existing or future outdoor confinement area or farm animal yard which requires approval under the Nutrient Management Act, ceases to be or never becomes a significant drinking water threat, where such activity is or would be a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall prohibit this activity to ensure it never becomes a significant drinking water threat.
DC-M-CW-16.2 Existing/Future Part IV - Prohibit WHPA-A-v.10	To ensure any existing or future outdoor confinement area or farm animal yard which does not require approval under the Nutrient Management Act, ceases to be or never becomes a significant drinking water threat, where such activity is or would be a significant drinking water threat, this activity is designated for the purpose of Section 57 of the <i>Clean Water Act</i> and therefore prohibited.

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the Town of Grand Valley
<p>DC-M-CW-16.3</p> <p>Existing/Future Part IV - Prohibit WHPA-A-v.10</p>	<p>To ensure any existing or future livestock grazing or pasturing, where the number of animals on the land at any time is sufficient to generate nutrients at an annual rate that is greater than 0.5 nutrient units/acre, ceases to be or never becomes a significant drinking water threat, where such activity is or would be a significant drinking water threat, this activity is designated for the purposes of Section 57 of the Clean Water Act, and is therefore prohibited.</p>
<p>DC-M-MC-16.4</p> <p>Future Land Use Planning WHPA-A-v.10</p>	<p>To ensure any future outdoor confinement area or farm animal yard never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Township and the County of Dufferin, where applicable, shall amended planning documents to prohibit future outdoor confinement areas or farm animal yards.</p>
<p>DC-M-CW-16.5</p> <p>Existing Education&Outreach WHPA-A-v.10</p>	<p>To ensure any existing livestock grazing or pasturing, outdoor confinement area or farm animal yard ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Township in collaboration with conservation authorities, shall undertake an education and outreach program, and use materials developed by the Ministry of Environment where possible to target existing livestock grazing or pasturing, outdoor confinement areas or farm animal yards.</p>

6.5 Schedule A: Dufferin County:Township of Melancthon, Shelbrune Water Supply(Well PW7)



Significant Drinking Water Threat Policy Applicability

Significant Drinking Water Threat Policy Categories	Vulnerability Scores on Map		
	10	8	2,4,6
1. Waste Disposal			
2. Sewage Systems			
3, 4. Agricultural Source Material			
6, 7. Non-Agricultural Source Material*			
8, 9. Commercial Fertilizer*			
10, 11. Pesticide			
12, 13. Road Salt*			
14. Storage of Snow			
15. Fuel			
16. DNAPLs			
17. Organic Solvents			
18. Aircraft De-icing			
21. Livestock Area			
Local Threat			
Oil Pipelines			

Note: This table provides a summary of the activities listed in the Clean Water Act (2006) that apply as Prescribed Drinking Water Threats (PDWT) within the Non-GUDI Wellhead Protection Zones shown on this map. For details refer to the text of the Source Protection Plan and the Ministry of the Environment Drinking Water Threats Tables.

*Application of Commercial Fertilizer, Non-Agricultural Source Material, and Road Salt may not be a significant drinking water threat in some areas due to the % managed land, livestock density, and/or % impervious surface calculations for these areas. See the text of the plan for further details.

Well	Lower Tier Municipal Boundary
Road	Wellhead Protection Zones:
Minor River	WHPA-A
Lake / Main River	WHPA-B
Source Protection Area Boundary	WHPA-C



1. Updated February 24, 2015
 2. Larger scale mapping of some map layers, including roads and vulnerability scores, is available at www.sourcewater.ca.
 3. This map is for illustrative purposes only. Information contained hereon is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user.

Policy Number	Source Protection Plan Policies within the County of Wellington
Source Protection Plan	<p>policies of the Source Protection Plan apply. The boundaries for the circumstances shown on the Plan Schedules are general. More detailed interpretation of the boundaries relies on the mapping in the approved Assessment Report and the Specific Circumstances found in the Tables of Drinking Water Threats, <i>Clean Water Act</i>, 2006.</p> <p>b) Where any Act or portion of an Act of the Ontario Government or Canadian Government is referenced in this Plan, such reference shall be interpreted to refer to any subsequent renaming of sections in the Act as well as any subsequent amendments to the Act, or successor thereof. This provision is also applicable to any policy statement, regulation or guideline issued by the Province or the municipality. No provision of this Plan shall derogate from any applicable law.</p>

7.3 Policies Addressing Prescribed Drinking Water Threats

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Wellington
1. Establishment, Operation or Maintenance of a Waste Disposal Site, within the Meaning of Part V of the <i>Environmental Protection Act</i>	
WC-MC-2.1. Existing Prescribed Instr. WHPA-A-v.10; WHPA-B-v.10; WHPA-C-v.8; IPZ-1-v.10	To ensure an existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or the Ontario Water Resources Act that is subject to an Environmental Compliance Approval, ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, as prescribed by the <i>Clean Water Act</i> , 2006, the Ministry of the Environment shall review and, if necessary, amend Environmental Compliance Approvals to ensure that terms and conditions are incorporated that, when implemented, ensure that the activity ceases to be a significant drinking water threat.
WC-CW-2.2. Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; WHPA-B-v.8 WHPA-C-v.8 IPZ-1-v.10	To ensure an existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or the Ontario Water Resources Act which does not require an Environmental Compliance Approval, ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, as prescribed by the <i>Clean Water Act</i> , 2006, this activity is designated for the purpose of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan is required.
WC-MC-2.3. Future Prescribed Instr. WHPA-A-v.10; WHPA-B-v.10; WHPA-B-v.8; WHPA-C-v.8; IPZ-1-v.10	To ensure the establishment, operation or maintenance of a new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or the Ontario Water Resources Act , that is subject to an Environmental Compliance Approval, never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, as prescribed by the <i>Clean Water Act</i> , 2006, the Ministry of the Environment shall prohibit these activities within the Environmental Compliance Approvals process.
WC-CW-2.4. Future i) Part IV-Prohibit WHPA-A-v.10 ii) Part IV-RMP WHPA-A-v.10 WHPA-B-v.8, v.10; WHPA-C-v.8 ; IPZ-1-v.10; ICA (NIT or TCE Outside of	<p>To ensure the establishment, operation or maintenance of a new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or the <i>Ontario Water Resources Act</i> which does not require an Environmental Compliance Approval, never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, as prescribed by the <i>Clean Water Act</i>, 2006,</p> <p>i. This activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act</i>, 2006 within a WHPA 'A' and shall be prohibited.</p> <p>This activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act</i>, 2006 and a Risk Management Plan shall be required within a: WHPA 'B' with a vulnerability score equal to ten (10); WHPA 'B' or 'C' with a vulnerability score equal to eight (8); IPZ One; or, Nitrate or TCE ICA outside of</p>

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Wellington
Drayton, Elora, or Fergus, well systems due to managed land and livestock density calculations	
9. The Handling and Storage of Commercial Fertilizer	
WC-CW-9.1. i) Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10; ICA(NIT) ii) Future Part IV-RMP WHPA-B-v.10 ICA(NIT) v.10	To ensure: i) an existing facility storing more than 2,500 kilograms of commercial fertilizer as defined in O. Reg. 267/03 within a WHPA 'A' or WHPA 'B' with a vulnerability score equal to ten (10), an IPZ One (1), or a Nitrate Issue Contributing Area or; ii) the future storage of more than 2,500 kilograms of commercial fertilizer as defined in O. Reg. 267/03 within a WHPA 'B' with a vulnerability score equal to ten (10) or a Nitrate Issue Contributing Area where the vulnerability score is less than 10, ceases to be or never becomes a significant drinking water threat, this activity is designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan is required.
WC-CW-9.2. Future Part IV-Prohibit WHPA-A-v.10; IPZ-1-v.10	To ensure the handling and storage of commercial fertilizer greater than 2,500 kilograms of commercial fertilizer as defined in O. Reg. 267/03 within a WHPA 'A' and IPZ One (1), never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
10. The Application of Pesticide to Land	
WC-CW-10.1. Existing/Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10	To ensure the existing or future application of pesticides within the meaning of Part I of the <i>Pesticide Act</i> on lands greater than one (1) hectare ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.
11. The Handling and Storage of Pesticides	
WC-CW-11.1. i) Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10 ii) Future Part IV-RMP WHPA-B-v.10	To ensure: i) an existing facility for the handling and storage of pesticides within the meaning of Part I of the <i>Pesticide Act</i> where this activity is a significant drinking water threat, or; ii) the future handling and storage pesticides within the meaning of Part I of the <i>Pesticide Act</i> within WHPA'B' with a vulnerability score equal to ten (10), ceases to be or never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.
WC-CW-11.2. Future Part IV-Prohibit WHPA-A-v.10; IPZ-1-v.10	To ensure any new facility for the handling and storage of pesticides within the meaning of Part I of the <i>Pesticide Act</i> within a WHPA 'A' or IPZ One (1), never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
12. The Application of Road Salt	
WC-CW-12.1 Existing/Future Specify Action ICA (CHL/SOD)	Where a Chloride or Sodium Issue Contributing Area has been identified as a drinking water issue, the municipality and / or County of Wellington shall review and, if necessary, revise their Salt Management Plans for the application of salt on roadways in all Wellhead Protection Areas. The Salt Management Plan shall

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Wellington
	include, as a minimum, measures to ensure application rate, timing and location reduce the potential for salt-related surface water run-off and groundwater infiltration and meet the objectives of Environment Canada's Code of Practice for Environmental Management of Road Salts including the salt vulnerable area mapping to include areas where significant threats can occur.
13. The Handling and Storage of Road Salt	
WC-CW-13.1. <i>i) Existing</i> Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10 <i>ii) Future</i> Part IV-RMP WHPA-B-v.10	To ensure: i) an existing facility for the handling and storage of road salt within WHPA 'A' and WHPA 'B' or Sodium or Chloride Issue Contributing Area with a vulnerability score of ten (10) or IPZ One (1), or; ii) any new facility for the handling and storage of road salt within a WHPA 'B' or Sodium or Chloride Issue Contributing Area with a vulnerability score equal to ten (10), ceases to be or never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.
WC-CW-13.2. <i>Future</i> Part IV-Prohibit WHPA-A-v.10; IPZ-1-v.10	To ensure any new facility for the handling and storage of road salt within a WHPA 'A' or IPZ-One (1), never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
WC-CW-13.3. <i>Existing/Future</i> Education & Outreach ICA (NIT CHL/SOD) v.<10 (Outside WHPA-A & WHPA B-v.10)	To ensure any existing or new facilities for the handling storage of road salt ceases to be or never becomes a significant drinking water threat, where this activity is a significant drinking water threat within a Nitrate Sodium or Chloride ICA where the vulnerability score is less than 10 outside of a WHPA 'A' or 'B' with a vulnerability score equal to ten (10), the municipality shall develop and implement an education initiative about the application and storage of agricultural source material handling and storage of road salt. The education program shall encourage the implementation of the best management practices which form the core of the Smart about Salt accreditation program to reduce the impact of winter de-icing activities.
14. The Storage of Snow	
WC-CW-14.1. <i>Existing</i> Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10; ICA(CHL/SOD/NIT)	To ensure any existing snow storage ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity is designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan is required. To ensure: i) an existing facility for snow storage within WHPA 'A' and WHPA 'B' with a vulnerability score of ten (10) or IPZ One (1), or; ii) any new facility for snow storage within a WHPA 'B' with a vulnerability score equal to ten (10), ceases to be or never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.
WC-CW-14.2. <i>Future</i> Part IV-Prohibit	To ensure any new snow storage within a WHPA 'A' or IPZ-One (1), never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Wellington
WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10; ICA(CHL/SOD/NIT)	Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
WC-CW-14.3 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10; ICA (NIT/SOD/CHL)	To ensure existing or new snow storage within a WHPA 'A' or 'B' with a vulnerability score equal to ten (10), IPZ One, or Nitrate, Sodium or Chloride ICA cease to be or never become a significant drinking water threat, the municipality shall develop and implement an education initiative about snow storage. The education program shall encourage the use of beneficial management practices that reduce the impact on groundwater.
15. The Handling and Storage of Fuel	
WC-CW-15.1. Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10	To ensure the existing and future handling and storage of fuel more than 250 Litres but not more than 2500 Litres ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the municipality shall develop and implement an education and outreach program for property owners with identified fuel oil tanks outlining the requirements under the fuel oil code by the Technical Standards and Safety Authority and best management practices that could be implemented.
WC-CW-15.2. i) Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10 ii) Future Part IV-RMP WHPA-B-v.10	To ensure: <ol style="list-style-type: none"> the existing handling and storage of liquid fuel of more than 2,500 Litres, where this activity is a significant drinking water threat, or; any new handling and storage of liquid fuel of more than 2,500 Litres within a WHPA 'B' with a vulnerability score equal to ten (10), ceases to be or never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. For significant threats that are Technical Standards and Safety Authority regulated, the Risk Management Plan may be at a minimum scoped to address matters such as a contaminant management plan and any monitoring, reporting completed by the proponent/applicant and auditing requirements provided to the Technical Standards and Safety Authority.
WC-CW-15.3. Future Part IV-Prohibit WHPA-A-v.10; IPZ-1-v.10	To ensure any new facility for the handling and storage of liquid of more than 2,500 Litres within a WHPA 'A' or IPZ One (1), never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited. Notwithstanding this prohibition, fuel handling and storage required for emergency back-up generators within these vulnerable areas may be permitted subject to a risk management plan in accordance with policy WC-CW-15.2.
WC-MC-15.4. Existing/Future Prescribed Instr. WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.10	To ensure any existing or new handling and storage of fuel on properties licensed under the <i>Aggregate Resources Act</i> ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, <ol style="list-style-type: none"> The Ministry of Natural Resources shall review all licenses and site plans issued under the <i>Aggregate Resources Act</i> and, if necessary, include measures that, when implemented, will manage the risk so that these activities do not become a risk to municipal drinking water sources. The Ministry of Natural Resources shall not issue new or amended licenses or permits and approve site plans under the <i>Aggregate Resources Act</i> unless measures that, when implemented, will manage the risk so that

12.2 County of Oxford Source Protection Plan Policies

Policy Number	Source Protection Plan Policies within the County of Oxford
Transitional Policies and Implementation Timing	
OC-CW-1.1 <i>Implement. & Timing</i>	<p>Except as set out below or as otherwise prescribed by Section 57 or 58 of the <i>Clean Water Act</i>, 2006 the policies contained in this Source Protection Plan shall come into effect on the effective date set by the Minister date of the posting of the notice of approval of this Source Protection Plan on the Environmental Registry.</p> <ol style="list-style-type: none"> For Section 57 of the <i>Clean Water Act</i>, 2006 if an activity was engaged in a particular location before this Source Protection Plan takes effect, policies regarding prohibited activities do not apply to a person who engages in the activity at that location until 180 days from the date the Source Protection Plan takes effect; For Section 58 of the <i>Clean Water Act</i>, 2006 if an activity was engaged in at a particular location before this Source Protection Plan takes effect and the Risk Management Official gives notice to a person who is engaged in the activity at that location that, in the opinion of the Risk Management Official, policies regarding regulated activities should apply to the person who engages in the activity at that location on and after a date specified in the notice that is at least 120 days after the date notice is given; For Section 59 of the <i>Clean Water Act</i>, 2006 restricted land use policies shall come into effect on the day the Source Protection Plan takes effect; For Section 43 of the <i>Clean Water Act</i>, 2006 if an activity was engaged in a particular location before this Source Protection Plan takes effect, amendments to prescribed instruments shall be completed within three (3) years from the date the Source Protection Plan takes effect; For Section 40 and 42 of the <i>Clean Water Act</i>, 2006 the amendments to the Official Plan required to conform with the significant threat policies shall be initiated adopted by the County within five (5) years of from the effective date of the Source Protection Plan takes effect, or as part of the next Official Plan Review undertaken in accordance with Section 26 of the <i>Planning Act</i>. The amendments to the Zoning By-Laws required to conform with the significant threat policies in this Source Protection Plan shall be adopted initiated by the Area Municipalities within three (3) two (2) years of the effective date of the above noted amendments to adoption of the Official Plan conformity amendment; and, Where the Source Protection Policies require the development of education and outreach programs as the primary tool for managing or eliminating a particular significant threat, such programs shall be developed and implemented within five (5) years from the date the Source Protection Plan takes effect.
OC-CW-1.2 <i>Transition</i>	<ol style="list-style-type: none"> Notwithstanding the definition of existing, where development is being proposed by one or more of the following applications: <ol style="list-style-type: none"> A site specific amendment to a zoning by-law under subsection 34(10) of the <i>Planning Act</i>; Approval of development in aA site plan control area under subsection 41(4) of the <i>Planning Act</i>; or Aa building permit under the <i>Building Code Act</i>., <p>a significant drinking water threat activity that is to be established as part of the proposed development may be considered existing for the purposes of complying with the applicable significant drinking water threat policies, provided that:</p> <ol style="list-style-type: none"> The application was deemed to be complete by the applicable

Policy Number	Source Protection Plan Policies within the County of Oxford
	<p>official may be permitted to make the determination that a site specific land use is not designated for the purposes of section 59. Where such direction has been issued, a site specific land use that is the subject of an application for approval under the <i>Planning Act</i> or for a permit under the <i>Building Code Act</i> is not designated for the purposes of Section 59, provided that the planning authority or building official, as the case may be applicable, is satisfied that:</p> <ol style="list-style-type: none"> the application complies with the circumstances specified in the written direction issued by from the Risk Management Official; and the applicant has demonstrated that a significant drinking water threat activity designated for the purposes of section 57 or 58 will not be engaged in, or will not be affected by the application.
Official Plan and Zoning By-law Amendment(s) Policies	
OC-MC-1.4 <i>Future Land Use Planning</i>	<p>The County shall amend the Official Plan and the Area Municipalities shall amend their respective Zoning By-Laws to:</p> <ol style="list-style-type: none"> Identify the WHPAs in which a significant drinking water threat could occur; Indicate that within the areas identified, any use or activity that is, or would be, a significant drinking water threat is required to conform with all applicable Source Protection Plan policies and, as such, may be prohibited, restricted or otherwise regulated by these these policies in the Source Protection Plan; Identify the significant drinking water threats that are prohibited through Prescribed Instruments, or Section 57 of the <i>Clean Water Act, 2006</i> in accordance with the significant drinking water threat specific policies contained in this Source Protection Plan; and, Incorporate any other amendments required to conform with the significant drinking water threat specific land use policies identified in this Source Protection Plan.; and Incorporate a cross-reference indicating a planning application cannot be made unless it includes a notice issues by the risk management official as set out in Section 59(1) of the Clean Water Act, 2006 and Section 62 of O. Reg 287/07.
Education and Outreach Programs	
OC-CW-1.5 <i>Existing/Future Education & Outreach</i>	<p>The County, in collaboration with Conservation Authorities and other bodies wherever possible, may develop and implement education and outreach programs directed at any, or all, significant drinking water threats, where such programs are deemed necessary and/or appropriate by the County and subject to available funding. Such programs may include, but not necessarily be limited to, increasing awareness and understanding of significant drinking water threats and promotion of best management practices.</p>
Incentive Programs	
OC-CW-1.6 <i>Existing/Future Incentive</i>	<p>The County, in collaboration with the Ministry of the Environment and Climate Change, Conservation Authorities and other bodies wherever possible, may develop and implement incentive programs directed at various significant drinking water threats, where such programs are deemed necessary and/or appropriate by the County and subject to available funding.</p>
OC-NB-1.7 <i>Existing/Future Incentive</i>	<p>The Ministry of the Environment and Climate Change and other provincial ministries shall consider providing, continued funding and support for incentive programs, such as the Ontario Drinking Water Stewardship Program, to assist in protecting existing and future drinking water sources and addressing significant drinking water threats.</p>
Annual Reporting	
OC-CW-1.8 <i>Monitoring</i>	<p>The County shall provide a report to the Source Protection Authority, by February 1st of each year, summarizing the actions taken by the County to implement the Source Protection Plan Policies, where specifically required by the</p>

Policy Number	Source Protection Plan Policies within the County of Oxford
	<ul style="list-style-type: none"> a. The County is requested to incorporate the location of WHPAs into their emergency response plans in order to protect municipal drinking water sources when a spill occurs along highways or rail lines. b. The Ministry of the Environment and Climate Change is requested to provide mapping of the identified vulnerable areas to the Spills Action Centre to assist them in responding to reported spills along transportation corridors.
Transport Pathways	
OC-NB-1.16 <i>Existing/Future Specify Action</i>	The Ministry of Environment and Climate Change should consider providing sufficient staff and financial resources to ensure the effective implementation of ongoing programs to decommission abandoned water wells, in accordance with O. Reg. 903 of the <i>Ontario Water Resources Act</i> .
Interpretation	
OC-CW-1.17 <i>Interpretation of Source Protection Plan</i>	<p>The Source Protection Plan provides policies to meet the objectives of the <i>Clean Water Act, 2006</i>. The Source Protection Plan consists of the written policy text and Schedules.</p> <ul style="list-style-type: none"> a) The Schedules in the Source Protection Plan identify the areas where the policies of the Source Protection Plan apply. The boundaries for the circumstances shown on the Plan Schedules are general. More detailed interpretation of the boundaries relies on the mapping in the approved Assessment Report and the Specific Circumstances found in the Tables of Drinking Water Threats, <i>Clean Water Act, 2006</i>. b) Where any Act or portion of an Act of the Ontario Government or Canadian Government is referenced in this Plan, such reference shall be interpreted to refer to any subsequent renaming of sections in the Act as well as any subsequent amendments to the Act, or successor thereof. This provision is also applicable to any policy statement, regulation or guideline issued by the Province or the municipality. No provision of this Plan shall derogate from any applicable law.
Prescribed Instruments Issued Under the Nutrient Management Act	
OC-MC-1.18 <i>Existing/Future Prescribed Instrument</i>	Any Prescribed Instrument issued under the Nutrient Management Act that is created or amended or is used for the purposes of obtaining an exemption from a risk management plan under section 61 of O. Reg. 287/07 shall incorporate terms and conditions that, when implemented, manage the activities they regulate such that those activities cease to be or never become, a significant drinking water threat. OMAFRA is expected to review all Prescribed Instruments issued under the Nutrient Management Act in areas where the activities they regulate are, or would be, significant drinking water threats to ensure the Prescribed Instruments contain such terms and conditions, including the Prescribed Instruments that area not directly created or issued by OMAFRA, such as Nutrient Management Plans.
OC-NB-1.19 <i>Existing/Future Specify Action</i>	OMAFRA, and other creators/issuers of Prescribed Instruments under the Nutrient Management Act, are expected to consult with the Risk Management Official with respect to any modifications or requirements that may need to be incorporated into such Prescribed Instruments to ensure the activities they regulate cease to be or never become significant drinking water threats.

12.3 Policies Addressing Prescribed Drinking Water Threats

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Oxford
1. Establishment, Operation or Maintenance of a Waste Disposal Site, within the Meaning of Part V of the <i>Environmental Protection Act</i>	
OC-MC-2.1	For any existing waste disposal site within the meaning of Part V of the

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Oxford
	The requirements of the risk management plan may be based on Ministry of the Environment and Climate Change tools and requirements for such activities, as set out in the <i>Environmental Protection Act</i> , but may also include any modifications or additional requirements that are deemed necessary or appropriate by the Risk Management Official.
2. Establishment, Operation or Maintenance of a System That Collects, Stores, Transmits, Treats or Disposes of Sewage	
Sewage System or Sewage Works – Septic System and Septic System Holding Tanks	
OC-CW-3.1 <i>Existing/Future Specify Action WHPA-A- v.10; WHPA-B- v.10</i>	For any existing septic system or septic system holding tank regulated under the <i>Ontario Building Code Act</i> , including expansions, modifications or replacements of such systems, where this activity is a significant drinking water threat, or For any new septic system or septic system holding tank regulated under the <i>Ontario Building Code Act</i> that is required for a municipal water supply well, where this activity would be a significant drinking water threat, a. The County shall implement an on-site sewage system maintenance inspection program, as required by the <i>Ontario Building Code Act</i> , to ensure these activities cease to be or never become significant drinking water threats.
OC-MC-3.2 <i>Future Land Use Planning WHPA-A- v.10; WHPA-B- v.10</i>	For a new septic system or septic system holding tank, with the exception of a new septic system or septic system holding tank regulated under the <i>Ontario Building Code Act</i> that is required for a municipal water supply well, where these activities would be significant drinking water threats, the County shall amend their Official Plan and the Area Municipalities shall amend their respective Zoning By-laws to prohibit development requiring uses, buildings and/or structures that would require a new septic system or septic system holding tank to be located within such areas, to ensure these activities never become significant drinking water threats.
OC-MC-3.3 <i>Existing Prescribed Instr. WHPA-A- v.10; WHPA-B- v.10</i>	For an existing septic system or septic system holding tank subject to an Environmental Compliance Approval in accordance with the <i>Ontario Water Resources Act</i> , where these activities are significant drinking water threats, the Ministry of the Environment and Climate Change shall review, and where necessary, amend Environmental Compliance Approvals, to incorporate terms and conditions that, when implemented, ensure these activities cease to be significant drinking water threats. The terms and conditions should include, but not necessarily be limited to, requirements for the proponent/applicant to undertake mandatory monitoring of groundwater impacts, contingencies in the event that drinking water quality is adversely affected, regular and ongoing compliance monitoring, mandatory system inspections at least every five (5) years, annual reporting to the Source Protection Authority and the County on any required inspection or monitoring programs and upgrading of these septic systems to current standards, where necessary.
OC-MC-3.4 <i>Future Prescribed Instr. WHPA-A- v.10; WHPA-B- v.10</i>	For a new septic system or septic system holding tank requiring an Environmental Compliance Approval, in accordance with the <i>Ontario Water Resources Act</i> , where these activities would be significant drinking water threats, the Ministry of the Environment and Climate Change shall prohibit these activities through the Environmental Compliance Approvals process to ensure these activities never become significant drinking water threats.
Sewage System or Sewage Works- Storage of Sewage (e.g., treatment plant tanks)	
Sewage System or Sewage Works- Sewage Treatment Plant Effluent Discharges	
OC-MC-3.5	For any existing sewage treatment plant effluent discharges or storage of sewage, where these activities are significant drinking water threats, the Ministry of the

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Oxford
<i>Existing Prescribed Instr.</i> WHPA-A- v.10; WHPA-B- v.10 WHPA-B-v.8; WHPA-C-v.8	Environment and Climate Change shall review, and where necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, ensure these activities cease to be significant drinking water threats.
OC-MC-3.6 <i>Future Prescribed Instr.</i> WHPA-A- v.10; WHPA-B- v.10 WHPA-B-v.8; WHPA-C-v.8	For any new sewage treatment plant effluent discharge or storage of sewage, where these activities would be significant drinking water threats, the Ministry of the Environment and Climate Change shall prohibit these activities through the Environmental Compliance Approvals process to ensure these activities never become significant drinking water threats.
Sewage System or Sewage Works – Sanitary Sewers and Related Pipes	
OC-MC-3.7 <i>Existing/Future Prescribed Instr.</i> WHPA-A- v.10; WHPA-B- v.10	<p>For any existing or new sanitary sewer and related pipes, where this activity is, or would be a significant drinking water threat, the Ministry of the Environment and Climate Change shall ensure that the Environmental Compliance Approval for this activity is prepared, or, where necessary, amended to incorporate terms and conditions that, when implemented ensure this activity ceases to be or will never become a significant drinking water threat.</p> <p>The terms and conditions may include, but not necessarily be limited to, requirements for regular maintenance and inspections by the holder of the Environmental Compliance Approval.</p>
Sewage System or Sewage Works – Discharge of Stormwater from a Stormwater Management Facility	
OC-MC-3.8 <i>Existing Prescribed Instr.</i> WHPA-A- v.10; WHPA-B- v.10	For any existing stormwater management facility that discharges stormwater, where this activity is a significant drinking water threat, the Ministry of the Environment and Climate Change shall review and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, will ensure this activity ceases to be a significant drinking water threat.
OC-MC-3.9 <i>Future Prescribed Instr.</i> WHPA-A- v.10; WHPA-B- v.10	For any new stormwater management facility that would discharge stormwater where this activity would be a significant drinking water threat, the Ministry of the Environment and Climate Change shall prohibit this activity through the Environmental Compliance Approvals process to ensure this activity never becomes a significant drinking water threat.
3. The Application of Agricultural Source Material	
OC-CW-4.1 <i>Existing/Future Part IV-Prohibit</i> WHPA-A-v.10	For any new or existing application of agricultural source material to land within a WHPA 'A', where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity ceases to be or never becomes a significant drinking water threat.
OC-CW-4.2 <i>Existing/Future Part IV-RMP</i> WHPA-B-v.10	<p>For any new or existing application of agricultural source material to land outside of a WHPA 'A', where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a <i>Risk Management Plan</i> shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat.</p> <p>The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient Management Act</i>, but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official. However, nothing in this policy grants the Risk Management Official the authority to specify</p>

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Oxford
	requirements for a prescribed instrument issued under the Nutrient Management Act, or where a person is seeking an exemption from a risk management plan under section 61 of O. Reg 287/07.
4. The Storage of Agricultural Source Material	
OC-CW-5.1 <i>Future Part IV-Prohibit WHPA-A- v.10; WHPA-B- v.10</i>	For any new storage of agricultural source material, where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat.
OC-CW-5.2 <i>Existing Part IV-RMP WHPA-A- v.10; WHPA-B- v.10</i>	<p>For any existing storage of agricultural source material, where this activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be a significant drinking water threat.</p> <p>The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient Management Act</i>, but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official. However, nothing in this policy grants the Risk Management Official the authority to specify requirements for a prescribed instrument issued under the Nutrient Management Act, or where a person is seeking an exemption from a risk management plan under section 61 of O. Reg 287/07.</p>
6. The Application of Non-Agricultural Source Material (NASM)	
OC-MC-6.1 <i>Existing/Future Prescribed Instr. WHPA-A- v.10; WHPA-B- v.10</i> <i>In the Platsville well system policy only applies to the application of NASM from a meat plant or sewage works</i>	For any existing or future application of non-agricultural source material to land where this activity is, or would be, a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or the Ministry of the Environment and Climate Change, as applicable, shall prohibit this activity through the Non-Agricultural Source Material (NASM) Plan process, in accordance with the <i>Nutrient Management Act</i> , or through the Environmental Compliance Approval process, in accordance with the <i>Environmental Protection Act</i> , to ensure this activity ceases to be or never becomes a significant drinking water threat.
7. The Handling and Storage of Non-Agricultural Source Material (NASM)	
OC-MC-7.1 <i>Existing Prescribed Instr. WHPA-A- v.10; WHPA-B- v.10</i>	For any existing facility for the handling and storage of non-agricultural source material where this activity is a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs, or Ministry of the Environment and Climate Change, as applicable, shall review, and if necessary, amend the required Non-Agricultural Source Material (NASM) Plan, in accordance with the <i>Nutrient Management Act</i> , or Environmental Compliance Approval, in accordance with the <i>Environmental Protection Act</i> , to ensure such Plans/Compliance Approvals incorporate terms and conditions that, when implemented, ensure this activity ceases to be a significant drinking water threat.
OC-MC-7.2 <i>Future Prescribed Instr. WHPA-A- v.10; WHPA-B- v.10</i>	For any new handling and storage of non-agricultural source material, where this activity would be a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or Ministry of the Environment or Climate Change, as applicable, shall prohibit this activity through the Non-Agricultural Source Material (NASM) Plan process in accordance with the <i>Nutrient Management Act</i> , or through the Environmental Compliance Approval process in accordance with the <i>Environmental Protection Act</i> , to ensure this activity never becomes a significant drinking water threat.

11.0 COUNTY OF PERTH- TOWNSHIP OF PERTH EAST

The following County of Perth, Township of Perth East Source Protection Plan policies apply to the Milverton Water Supply system located in Township of Perth East within the Grand River Source watershed as presented in Schedule A. Source Protection policies for the remainder of the County of Perth can be found in the neighbouring Saugeen, Grey Sauble, Northern Bruce Peninsula and Ausable Bayfield Maitland Valley Source Protection Plans.

11.1 Definitions

General definitions are provided in Volume I of the Source Protection Plan or in the *Clean Water Act, 2006*. Defined terms are intended to capture both the singular and plural of forms of these terms.

The following definitions shall apply to the County of Perth Source Protection Policies.

County – means the Corporation of the County of Perth.

Existing – means any activity that has started or has been engaged in at a location in a vulnerable area before the Source Protection Plan takes effect.

except where otherwise indicated in this plan, existing means:

- a. undertaken or established as of the date the Source Protection Plan takes effect, or at some point prior to the date the Source Protection Plan takes effect with a demonstrated intent to continue
- b. a replacement or modification to a facility or structure of the same size or capacity but improved to provide greater protection to sources of drinking water;
- c. except where expressly prohibited, an expansion of an existing building or structure on the same lot provided there is no change in use and the expansion will bring the building or structure into closer conformity with the Source Protection Plan;
- d. the conversion of an existing use to a similar use, provided it is demonstrated that the conversion will bring the new use in compliance with the Source Protection Plan;
- e. a new facility or structure to service a lawfully existing use or activity in their existing capacity, in order to bring the facility, structure or use up to current standards and in compliance with the Source Protection Plan;

New or Future - means not existing, as defined herein.

Policy Number	Source Protection Plan Policies within the County of Perth- Township of Perth East
<i>Specify Action</i>	significant drinking water threat.
Interpretation	
PC-CW-1.17 <i>Interpretation of Source Protection Plan</i>	<p>The Source Protection Plan provides policies to meet the objectives of the <i>Clean Water Act, 2006</i>. The Source Protection Plan consists of the written policy text and Schedules.</p> <ol style="list-style-type: none"> The Schedules in the Source Protection Plan identify the areas where the policies of the Source Protection Plan apply. The boundaries for the circumstances shown on the Plan Schedules are general. More detailed interpretation of the boundaries relies on the mapping in the approved Assessment Report and the Specific Circumstances found in the Tables of Drinking Water Threats, <i>Clean Water Act, 2006</i>. Where any Act or portion of an Act of the Ontario Government or Canadian Government is referenced in this Plan, such reference shall be interpreted to refer to any subsequent renaming of sections in the Act as well as any subsequent amendments to the Act, or successor thereof. This provision is also applicable to any policy statement, regulation or guideline issued by the Province or the municipality. No provision of this Plan shall derogate from any applicable law.

11.3 Policies Addressing Prescribed Drinking Water Threats

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Perth- Township of Perth East
1. Establishment, Operation or Maintenance of a Waste Disposal Site, within the Meaning of Part V of the <i>Environmental Protection Act</i>	
PC-MC-2.1 <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure establishment, operation or maintenance of an existing or new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or as defined by the <i>Ontario Water Resources Act</i> that is subject to an Environmental Compliance Approval, ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of the Environment shall prohibit this activity within the Environmental Compliance Approval process.
PC-CW-2.2 <i>Existing/Future Part IV-Prohibit WHPA-A-v.10</i>	To ensure the establishment, operation or maintenance of an existing or new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or as defined by the <i>Ontario Water Resources Act</i> which does not require an Environmental Compliance Approval, ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
2. Establishment, Operation or Maintenance of a System That Collects, Stores, Transmits, Treats or Disposes of Sewage	
Sewage System or Sewage Works – Septic System and Septic System Holding Tanks	
PC-CW-3.1. <i>Future Land Use Planning WHPA-A-v.10</i>	To ensure future septic systems and septic system holding tanks never become significant drinking water threats, where such activities would be significant drinking water threats, the County and the Township shall amend their its Official Plan to identify the significant drinking water threat areas and include direction that additional servicing constraints may be applied through municipal zoning bylaws. The and the local Municipalities shall amend their respective Zoning By-laws to prohibit development uses, buildings and/or structures that would require ing a new septic system or septic system holding tank within identified significant drinking water threat areas and require those uses to be serviced by municipal services

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Perth- Township of Perth East
	(Section 43(1)3.1 and 34(5) of the Planning Act to ensure these activities never become significant drinking water threats.
PC-MC-3.2 <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure the establishment of an existing or new on-site sewage system with design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act</i> , ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of Environment shall prohibit this activity within the Environmental Compliance Approvals process.
Sewage System or Sewage Works- Storage of Sewage (e.g., treatment plant tanks) Sewage System of Sewage Works- Sewage Treatment Plant Effluent Discharges	
PC-MC-3.3. <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure the establishment of an existing or new sewage treatment plant with effluent and/or bypass discharge or existing or new sewage treatment plant with sewage storage tanks cease to be or never become a significant drinking water threat, where these activities are, or would be significant drinking water threats, the Ministry of the Environment shall prohibit these activities within the Environmental Compliance Approval process.
Sewage System or Sewage Works – Sanitary Sewers and Related Pipes	
PC-MC-3.4 <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure existing or new sanitary sewers and related pipes cease to be or never become a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of the Environment shall review and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, will ensure that this activity ceases to be and/or never becomes a significant drinking water threat. The terms and conditions may include requirements for regular maintenance and inspections conducted by the proponent.
Sewage System or Sewage Works – Discharge of Stormwater from a Stormwater Management Facility	
PC-MC-3.5. <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i>	To ensure the establishment of an existing or new stormwater management facility that discharges stormwater, ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of the Environment shall prohibit this activity within the Environmental Compliance Approval process.
3. The Application and Storage of Agricultural Source Material	
PC-CW-4.1. <i>Existing/Future Part IV-Prohibit WHPA-A-v.10</i>	To ensure the existing or new application and storage of agricultural source material on lands cease to be or never become a significant drinking water threat, where these activities are, or would be, a significant drinking water threat, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.
6. The Application of Non-Agricultural Source Material (NASM) 7. The Handling and Storage of Non-Agricultural Source Material (NASM)	
PC-MC-5.1. <i>Existing/Future Prescribed Instr. WHPA-A-v.10</i> <i>Applies only to the application of NASM containing material from a meat plant or sewage works</i>	To ensure the existing or new application of non-agricultural source material on lands ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or the Ministry of the Environment, as appropriate, shall prohibit these activities through the Non-Agricultural Source Material (NASM) Plan process, in accordance with the <i>Nutrient Management Act</i> , or through the Environmental Compliance Approval process, in accordance with the <i>Environmental Protection Act</i> .
PC-CW-5.2.	To ensure any existing or new facility for the handling and storage of

15.2 City Of Brantford Source Protection Plan Policies

Policy Number	Source Protection Plan Policies within the City of Brantford
Implementation Timing	
CB-CW-1.1 <i>Implement. & Timing</i>	<p>Except as set out below, the policies contained in this Source Protection Plan shall come into effect on the effective date set out by the Minister date of the posting of the notice of approval of this Source Protection Plan on the Environmental Registry.</p> <ol style="list-style-type: none"> For Section 57 of the <i>Clean Water Act</i>, 2006 if an activity was engaged in at a particular location before this Source Protection Plan took effect, policies regarding prohibited activities do not apply to a person who engages in the activity at that location until 180 days from the date the Source Protection Plan takes effect; For Section 58 of the <i>Clean Water Act</i>, 2006 if an activity was engaged in at a particular location before this Source Protection Plan took effect and the Risk Management Official gives notice to a person who is engaged in the activity at that location that, in the opinion of the Risk Management Official, policies regarding regulated activities apply to the person who engages in the activity at that location on and after a date specified in the notice that is at least 120 days after the date the notice is given; For Section 59 of the <i>Clean Water Act</i>, 2006 policies regarding restricted land uses shall take effect the same day the Source Protection Plan takes effect; Where the Source Protection Policies require the County and/or the Source Protection Authority to develop and implement education and outreach programs as the primary tool for managing or eliminating a particular significant threat, such programs shall be developed and implemented within five (5) years from the date the Source Protection Plan takes effect; For Sections 43 of the <i>Clean Water Act</i>, 2006 if an activity was engaged in at a particular location before this Source Protection Plan took effect, amendments to Prescribed Instruments shall be completed within three (3) years from the date the Source Protection Plan takes effect; For Section 40 and 42 of the <i>Clean Water Act</i>, 2006 the Official Plan must be amended and adopted by council to conform with the significant threat policies within five (5) years from the date the Source Protection Plan takes effect or the next Official Plan review required under Section 26 of the <i>Planning Act</i> and the Zoning By-law within two (2) years from the adoption of the Official Plan.
Uses and Areas Designated as Restricted Land Uses	
CB-CW-1.2 <i>Part IV- RLU</i>	In accordance with Section 59 of the <i>Clean Water Act</i> , 2006, all land uses, except solely residential uses, where significant drinking water threat activities have been designated for the purpose of Section 57 or Section 58 of the <i>Clean Water Act</i> , 2006, are hereby designated as Restricted Land Uses and a written notice from the Risk Management Official shall be required prior to approval of any Building Permit, <i>Planning Act</i> or <i>Condominium Act</i> application.
Official Plan and Zoning By-law Amendment(s) Policies	
CB-MC-1.3 <i>Future Land Use Planning</i>	<p>The City shall amend the its Official Plan and respective Zoning By-Laws to:</p> <ol style="list-style-type: none"> Identify the vulnerable areas in which drinking water threats prescribed under the <i>Clean Water Act</i>, 2006 would be significant; Indicate that within the areas identified, any use or activity that is, or would be, a significant drinking water threat is required to conform with all applicable Source Protection Plan policies and, as such, may be prohibited, restricted or otherwise regulated by those policies regulated by the Source Protection Plan; <p>Incorporate any other amendments required to conform with the threat specific land use policies identified in this Source Protection Plan.</p> <p>Identify the Intake Protection Zones (IPZs) in which drinking water threats prescribed</p>

Policy Number	Source Protection Plan Policies within the City of Brantford
CB-CW-1.8 <i>Monitoring</i>	Where the City is required to amend their Official Plan and/or Zoning By-law to bring their planning documents into conformity with the Source Protection Plan, the City shall provide proof of compliance to the Source Protection Authority and shall provide a copy of such compliance within 30 days of the amendments coming into effect adoption of the amendment(s) or, where the matter has been appealed to the Ontario Municipal Board, the date of their decision to approve. Where the City is required to amend their Official Plan and/or Zoning By-law to bring their planning documents into conformity with the Source Protection Plan, the City shall provide proof of compliance to the Source Protection Authority and shall provide a copy of such compliance.
CB-CW-1.9 <i>Monitoring</i>	The Risk Management Official shall provide a report to the Source Protection Authority, by February 1 st of each year, summarizing the actions taken by the Risk Management Official to implement the Source Protection Plan Policies, in accordance with the <i>Clean Water Act, 2006</i> and associated regulations.
CB-CW-1.10 <i>Monitoring</i>	Where the Source Protection Plan policies may result in amendments to prescribed instruments or the issuance of a new prescribed instrument, the applicable ministry shall provide a summary of any actions taken. The applicable ministry shall provide a written report summarizing this information to the Source Protection Authority by February 1 st of each year.
CB-CW-1.11 <i>Monitoring</i>	Where the Source Protection Plan policies prohibit an activity that results in a denial of a Prescribed Instrument, the applicable ministry shall summarize the actions taken the previous year to implement the policies and provide a written report summarizing this information to the Source Protection Authority by February 1 st of each year.
Strategic Action	
Spill Prevention, Spill Contingency or Emergency Response Plans	
CB-NB-1.12 <i>Existing/Future Specify Action</i>	To reduce the risks to drinking water from spills that occur within the Intake Protection Zone (IPZ) along highways, railway lines, or shipping lanes, a) The City shall incorporate the location of Intake Protection Zones into their Emergency Response Plans. b) The Ministry of the Environment shall provide mapping of the Intake Protection Zones (IPZ) to assist the Spills Action Centre in responding to reported spills along transportation corridors.
Interpretation	
CB-CW-1.13 <i>Interpretation of Source Protection Plan</i>	The Source Protection Plan provides policies to meet the objectives of the <i>Clean Water Act, 2006</i> . The Source Protection Plan consists of the written policy text and Schedules. a) The Schedules in the Source Protection Plan identify the areas where the policies of the Source Protection Plan apply. The boundaries for the circumstances shown on the Plan Schedules are general. More detailed interpretation of the boundaries relies on the mapping in the approved Assessment Report and the Specific Circumstances found in the Tables of Drinking Water Threats, <i>Clean Water Act, 2006</i> . b) Where any Act or portion of an Act of the Ontario Government or Canadian Government is referenced in this Plan, such reference shall be interpreted to refer to any subsequent renaming of sections in the Act as well as any subsequent amendments to the Act, or successor thereof. This provision is also applicable to any policy statement, regulation or guideline issued by the Province or the municipality. No provision of this Plan shall derogate from any applicable law.
Transition	
CB-CW-1.14 <i>Transition</i>	Despite the definition of existing, E for the purposes of this Plan, where one or more of the following: a. A complete application for development under the <i>Planning Act or Condominium Act</i> ; b. An application for Environmental Compliance Approval; or

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the City of Brantford
CB-MC-2.2 <i>Existing Prescribed Instr.</i> IPZ-2-v.9; IPZ-3-v.8	<p>To ensure any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or as regulated by the <i>Ontario Water Resources Act</i>, that is subject to an Environmental Compliance Approval, where such an activity is a significant drinking water threat, cease to be a significant drinking water threat, the Ministry of the Environment shall review, and if necessary, amend ensure that Environmental Compliance Approvals to ensure that include appropriate terms and conditions are incorporated that, when implemented, ensure that the waste disposal site is managed to reduce the risk to drinking water sources.</p> <p>The Environmental Compliance Approval shall include annual reporting to the Ministry of the Environment of water quality monitoring related to groundwater monitoring wells and surface water monitoring locations as appropriate.</p>
CB-CW-2.3 Future Existing Part IV- RMP Prohibit IPZ-1-v.10; IPZ-2-v.9; IPZ-3-v.8	<p>To ensure any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or as regulated by the <i>Ontario Water Resources Act</i>, which does not require an Environmental Compliance Approval (PCB Waste Storage and the storage of hazardous liquid industrial waste, excluding the storage of wastes described in clauses p,q,r,s,t,u of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste (O.Reg 347)), where such an activity is a significant drinking water threat, ceases to be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.</p> <p>To ensure any new waste disposal site, within the meaning of Part V of the <i>Environmental Protection Act</i>, with the exception of the storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste as per O. Reg. 347, which does not require an Environmental Compliance Approval, where such an activity would be a significant drinking water threat, never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and is therefore prohibited in the following vulnerable areas:</p> <ul style="list-style-type: none"> a) In an Intake Protection Zone 1 with a vulnerability score equal to ten (10) b) In an Intake Protection Zone 2 with a vulnerability score equal to nine (9), except for the storage of hazardous waste or liquid industrial waste c) In an Intake Protection Zone 3 with a vulnerability score equal to eight (8), except for the storage of hazardous waste or liquid industrial waste
CB-CW-2.4 Future Part IV- Prohibit RMP IPZ-1-v.10; IPZ-2-v.9; IPZ-3-v.8	<p>To ensure any future new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i> or as regulated by the <i>Ontario Water Resources Act</i>, which does not require an Environmental Compliance Approval (PCB Waste Storage and the storage of hazardous liquid industrial waste, excluding the storage of wastes described in clauses p,q,r,s,t,u of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste (O.Reg 347)), where such an activity would be a significant drinking water threat, never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and is therefore prohibited.</p> <p>To ensure any new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i>, for the storage of hazardous and liquid industrial waste, with the exception of the storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste as per O. Reg.</p>

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the City of Brantford
	<p>347, which does not require an Environmental Compliance Approval and where such waste disposal site would be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to manage the activity such that it never becomes a significant drinking water threat in the following vulnerable areas:</p> <p>a) In an Intake Protection Zone 2 with a vulnerability score equal to nine (9)</p> <p>b) In an Intake Protection Zone 3 with a vulnerability score equal to eight (8)</p> <p>The requirements of the risk management plan may be based on Ministry of the Environment tools and requirements for such activities, as set out in the <i>Environmental Protection Act</i>, but may also include any modifications or additional requirements that are deemed necessary or appropriate by the Risk Management Official.</p>
<p>CB-CW-2.5</p> <p>Existing/Future Education&Outreach Part IV - RMP IPZ-1-v.10; IPZ-2-v.9; IPZ-3-v.8</p>	<p>To ensure any existing or new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i>, which does not require an Environmental Compliance Approval (the storage of wastes described in clauses p,q,r,s,t,u of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste (O.Reg 347)), where such an activity would be a significant drinking water threat, ceases to be or never becomes a significant drinking water threat, the City of Brantford will develop an education and outreach program, and use materials developed by the MOE where possible, targeting those establishing, operating or maintaining a waste disposal site within the meaning of Part V of the <i>Environmental Protection Act</i>. The program will focus on the proper handling, storage and disposal of wastes described in clauses p, q, r, s, t, u of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste O.Reg 347.</p> <p>To ensure any existing waste disposal site, within the meaning of Part V of the <i>Environmental Protection Act</i>, with the exception of the storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste as per O. Reg. 347, which does not require an Environmental Compliance Approval, where such an activity is a significant drinking water threat, cease to be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act</i> and a Risk Management Plan shall be required.</p> <p>The requirements of the risk management plan may be based on Ministry of the Environment tools and requirements for such activities, as set out in the <i>Environmental Protection Act</i>, but may also include any modifications or additional requirements that are deemed necessary or appropriate by the Risk Management Official.</p>
<p>CB-CW-2.6</p> <p>Existing/Future Education&Outreach IPZ-1-v.10; IPZ-2-v.9; IPZ-3-v.8</p>	<p>The City of Brantford, in collaboration with Conservation Authorities and other bodies wherever possible, shall develop and implement education and outreach programs to address any existing and future waste disposal site, within the meaning of Part V of the <i>Environmental Protection Act</i>, including the storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste as per O. Reg. 347, within vulnerable areas where this activity is or would be a significant drinking water threat, that do not require an Environmental Compliance Approval. The program should focus on the proper handling, storage and disposal of wastes to ensure that these activities cease to be or never become significant drinking water threats.</p>
<p>2. Establishment, Operation or Maintenance of a System That Collects, Stores, Transmits, Treats or Disposes of Sewage</p>	
<p>Sewage System or Sewage Works- Septic System and Septic System Holding Tanks</p>	
<p>CB-CW-3.1</p> <p>Existing/Future</p>	<p>To ensure any existing or future new septic systems within Intake Protection Zone (IPZ) one (1) where such an activity is, or would be, a significant drinking water threat, ceases to be and/or never becomes a significant drinking water threat, the City shall develop an education</p>

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the City of Brantford
10. The Application of Pesticide to Land	
CB-CW-8.1 <i>Existing/Future Part IV-RMP IPZ-1-v.10; IPZ-2-v.9</i>	To ensure any existing or future application of pesticides, on non-residential properties, where such an activity is or would be a significant drinking water threat, ceases to be and or never becomes a significant drinking water threat, this activity is designated for the purposes of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required.
CB-CW-8.2 <i>Existing/Future Education&Outreach IPZ-1-v.10; IPZ-2-v.9</i>	To ensure any existing or future application of pesticides, on residential properties, where such activities are, or would be, significant drinking water threats, ceases to be and or never becomes a significant drinking water threat the City shall develop and implement education and outreach programs on the use of best management practices.
11. The Handling and Storage of Pesticides	
CB-CW-9.1 <i>Existing/ Future Part IV-RMP IPZ- 2-v.9</i>	To ensure any existing and future handling and storage of pesticides on non-residential properties cease to be and/or never becomes a significant drinking water threat, within Intake Protection Zone (IPZ) Two (2), where such an activity is a significant drinking water threat, this activity is designated for the purposes of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required.
CB-CW-9.2 <i>Future Part IV-Prohibit IPZ- 1-v.10</i>	To ensure any future handling and storage of pesticides within the meaning of the <i>Pesticide Act</i> within Intake Protection Zone (IPZ) One (1), where such an activity would be a significant drinking water threat, never becomes a significant drinking water threat, this activity is designated for the purposes of Section 57 of the <i>Clean Water Act</i> , 2006 and is therefore prohibited.
CB-CW-9.3 <i>Existing Part IV-RMP IPZ- 1-v.10</i>	To ensure any existing handling and storage of pesticides within the meaning of the <i>Pesticide Act</i> within Intake Protection Zone (IPZ) One (1), where such an activity would be a significant drinking water threat, never becomes a significant drinking water threat, this activity is designated for the purposes of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required.
13. The Handling and Storage of Road Salt	
CB-CW-10.1 <i>Existing/Future Education&Outreach IPZ-1-v.10; IPZ-2-v.9</i>	To ensure any existing or future handling and storage of road salt equal to or less than 5,000 tonnes, where such activities are, or would be, significant drinking water threats, the City shall develop and implement education and outreach programs for the private and public sector, as well as the general public, about the impacts of road salt on drinking water sources and the use of best management practices. It is recommended that the key messages be the efficient use of road salts and the use of alternatives to ensure this activity ceases to be and/or never becomes a significant drinking water threat.
CB-CW-10.2 <i>Existing/Future Specify Action IPZ-1-v.10; IPZ-2-v.9</i>	To ensure the handling and storage of road salt ceases to be and/or never becomes a significant drinking water threat. any existing or future handling and storage of road salt equal to or less than 5,000 tonnes, where such activities are, or would be, significant drinking water threats, the City shall amend its salt management plan to identify the location of the Intake Protection Zones and to enhance best management practices in these areas.
CB-MC-10.3 <i>Future Land Use Planning IPZ-1-v.10; IPZ-2-v.9</i>	To ensure the future handling and storage of road salt greater than 5,000 tonnes never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat; the City shall prohibit this activity through land use planning processes related land uses shall be prohibited.
CB-CW-10.4 <i>Existing Part IV-RMP IPZ- 1-v.10 IPZ-2-v.9</i>	To ensure the existing handling and storage of road salt never greater than 5,000 tonnes becomes a significant drinking water threat, where such an activity would be a significant drinking water threat; this activity is designated for the purposes of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required.

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the City of Brantford
14. The Storage of Snow	
CB-MC-11.1 <i>Future Land Use Planning IPZ-1-v.10; IPZ-2-v.9</i>	To ensure the future storage of snow never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the City shall prohibit the activity through land use planning processes.
CB-CW-11.2 <i>Existing Part IV-RMP IPZ-1-v.10 IPZ-2-v.9</i>	To ensure the existing storage of snow never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the activity is designated for the purpose of Section 58 of the Clean Water Act, and a Risk Management Plan shall be required.
15. The Handling and Storage of Fuel	
CB-CW-12.1 <i>Existing Part IV-RMP IPZ-1-v.10</i>	<p>To ensure any existing handling and storage of fuel greater than 2,500 Litres, where such an activity is or would be a significant drinking water threat, ceases to be a significant drinking water threat, this activity is designated for the purposes of Section 58 of the <i>Clean Water Act</i>, 2006 and a Risk Management Plan shall be required.</p> <p>The Risk Management Plan shall include the requirements for all storage tanks to comply with the requirements of the <i>Technical Standards and Safety Act</i> and its regulations, for all owners/operators to have an emergency response plan with emergency contact information of the municipality responsible for water services and the Spills Action Centre, and for the owner/operator to call both agencies in the case of a release of fuel.</p>
CB-MC-12.2 <i>Future Land Use Planning IPZ-1-v.10</i>	To ensure the future handling and storage of fuel greater than 2,500 Litres never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, related land uses shall be prohibited. the City shall prohibit this activity through land use planning processes.
CB-CW-12.3 <i>Existing/Future Education & Outreach IPZ-1-v.10</i>	To ensure the existing and future handling and storage of fuel equal to or less than 2,500 Litres, where such an activity is or would be a significant drinking water threat, the City, in collaboration with the Grand River Conservation Authority, shall develop and implement an education and outreach program regarding spill response and the method and timing for contacting the Spills Action Centre and the municipality responsible for water services to ensure this activity ceases to be and/or never becomes a significant drinking water threat.
16. The Handling and Storage of a Dense Non-Aqueous Phase Liquid (DNAPL)	
17. The Handling and Storage of an Organic Solvent	
CB-CW-13.1 <i>Existing/Future Part IV-RMP IPZ-1-v.10</i>	To ensure the existing or future handling and storage of dense non-aqueous phase liquids (DNAPL) and organic solvents on non-residential properties ceases to be and/or never becomes a significant drinking water threat, where such activities are or would be significant drinking water threats these activities are designated for the purpose of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required.
CB-CW-13.2 <i>Future Part IV-Prohibition IPZ-1-v.10</i>	To ensure the future handling and storage of dense non-aqueous phase liquids (DNAPL) and organic solvents on non-residential properties never becomes a significant drinking water threat, where such activities would be significant drinking water threats these activities are designated for the purpose of Section 57 of the <i>Clean Water Act</i> , 2006 and are therefore prohibited.
CB-CW-13.23 <i>Existing/Future</i>	To ensure the existing or future handling and storage of dense non-aqueous phase liquids (DNAPL) and organic solvents on residential properties, ceases to be and/or never becomes a significant drinking water threat where such activities are or would be significant drinking

Policy Number	Source Protection Plan Policies within the County of Brant
<i>Transition</i>	<p>a. A complete application for development under the <i>Planning Act or Condominium Act</i>;</p> <p>b. An application for Environmental Compliance Approval; or</p> <p>c. An application for a Building Permit.</p> <p>has been received by the applicable implementing body prior to the date this Source Protection Plan takes effect that particular a related significant drinking water threat mayshall be permitted subject to the policies pertaining to existing significant drinking water threats. Where the above noted applications have lapsed or been withdrawn, the above noted transition policies shall no longer apply.</p>
Uses and Areas Designated as Restricted Land Uses	
BC-CW-1.3 <i>Part IV- RLU</i>	In accordance with Section 59(1) of the <i>Clean Water Act, 2006</i> , all land uses, except solely residential uses, where significant drinking water threat activities have been designated for the purpose of Section 57 or Section 58 of the <i>Clean Water Act, 2006</i> , are hereby designated as Restricted Land Uses and a written notice from the Risk Management Official shall be required prior to approval of any Building Permit, <i>Planning Act or Condominium Act</i> application.
Official Plan and Zoning By-law Amendment(s) Policies	
BC-MC-1.4 <i>Future Land Use Planning</i>	The County shall amend their Official Plan and Zoning By-Laws to: <ol style="list-style-type: none"> Identify the vulnerable areas in which drinking water threats prescribed under the <i>Clean Water Act, 2006</i> would be significant; Indicate that within the areas identified, any use or activity that is, or would be, a significant drinking water threat is required to conform with all applicable Source Protection Plan policies and, as such, may be prohibited, restricted or otherwise regulated by those policies as regulated by the Source Protection Plan; Incorporate any other amendments required to conform with the threat specific land use policies identified in this Source Protection Plan.
Education and Outreach Programs	
BC-CW-1.5 <i>Existing/Future Education& Outreach</i>	The County, in collaboration with Conservation Authorities and other bodies wherever possible, may develop and implement education and outreach programs directed at any, or all, significant drinking water threats where such programs are deemed necessary and/or appropriate by the County. Such programs may include, but not necessarily be limited to, increasing awareness and understanding of significant drinking water threats and promotion of best management practices.
Incentive Programs	
BC-CW-1.6 <i>Existing/Future Incentive</i>	The County, in collaboration with other bodies and levels of government wherever possible, may develop and implement incentive programs directed at various significant drinking water threats where such programs are deemed necessary and/or appropriate by the County, subject to available funding.
BC-NB-1.7 <i>Existing/Future Incentive</i>	The Ministry of Environment and other provincial ministries shall consider providing continued funding and support for incentive programs to protect existing and future drinking water sources and address significant drinking water threats, such as the Ontario Drinking Water Stewardship Program and Rural Water Quality Program.
BC-NB-1.8 <i>Existing Incentive</i>	To reduce the risks to drinking water from an existing activity, where this activity is a significant drinking water threat, the Grand River Conservation Authority, in consultation with the County, will deliver available cost share incentive programs as long as the Grand River Conservation Authority has such programs and outreach staff available, and work with affected land owners to implement best management practices for the following activities: <ol style="list-style-type: none"> The application of agricultural source material to land; The storage of agricultural source material; and, The use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm-animal yard.

Policy Number	Source Protection Plan Policies within the County of Brant
Annual Reporting	
BC-CW-1.9 <i>Monitoring</i>	The County shall provide a report to the Source Protection Authority, by February 1 st of each year, summarizing the actions taken to implement the Source Protection Plan Policies. Where the County is required to implement education and outreach programs as the primary means of managing the risk associated with significant drinking water threats, the report must indicate, at minimum, the properties where these programs were implemented and additional details on how the significant drinking water threat was managed and/or ceased to be significant.
BC-CW-1.10 <i>Monitoring</i>	Where the County is required to amend their Official Plan and/or Zoning By-law to bring their planning documents into conformity with the Source Protection Plan, the County shall provide proof of compliance to the Source Protection Authority and shall provide a copy of such compliance within 30 days of adoption of the amendment(s) coming into effect or, where the matter has been appealed to the Ontario Municipal Board, the date of their decision to approve.
BC-CW-1.11 <i>Monitoring</i>	The Risk Management Official shall provide a report to the Source Protection Authority, by February 1 st of each year, summarizing the actions taken by the Risk Management Official to implement the Source Protection Plan Policies, in accordance with the <i>Clean Water Act, 2006</i> and associated regulations.
BC-CW-1.12 <i>Monitoring</i>	Where the Source Protection Plan policies may result in amendments to prescribed instruments or the issuance of a new prescribed instrument , the applicable ministry shall provide a summary of any actions taken the previous year to implement the policies and provide a written report summarizing this information to the Source Protection Authority by February 1 st of each year.
BC-CW-1.13 <i>Monitoring</i>	Where the Source Protection Plan policies prohibit an activity that results in a denial of a Prescribed Instrument, the applicable ministry shall summarize the actions taken the previous year to implement the policies and provide a written report summarizing this information to the Source Protection Authority by February 1 st of each year.
Local Threat: The Conveyance of Oil by way of Underground Pipelines	
BC-NB-1.14 <i>Existing/Future Specify Action WHPA-A-v.10; WHPA-B-v.10</i> <i>Monitoring</i>	To reduce the risks to drinking water from the conveyance of oil by way of underground pipeline within the meaning of O. Reg. 210/01 under the <i>Technical Safety and Standards Act</i> where the activity is or would be a significant drinking water threat, the National Energy Board, Ontario Energy Board, and the Ministry of Consumer Services are encouraged to provide the Source Protection Authority and the Municipality the location of any new proposed pipeline within the Municipality and/or Source Protection Area. The Source Protection Authority should document in the annual report the number of new pipelines proposed within vulnerable areas if a pipeline has been proposed and/or application has been received.
BC-CW-1.15 <i>Existing Part IV- RMP WHPA-A-v.10; WHPA-B-v.10</i>	To reduce the risk to drinking water from the conveyance of oil by way of underground pipeline where the activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. The Risk Management Plan may include, but not be limited to, the following: <ul style="list-style-type: none"> a. Evaluation of existing Spills Prevention Plans/ Spill Contingency Plans; b. An evaluation of communication plans and training protocols with respect to management of a spill; c. Additional measures to reduce the likelihood that a spill or leak would be a risk to

Policy Number	Policies Addressing Prescribed Drinking Water Threats within the County of Brant
<p><i>Future Land Use Planning</i></p>	<p>activity would be a significant drinking water threat, the County shall include policies in their Official Plan requiring all new development in vulnerable areas to be designed and maintained based on best management practices regarding salt application and storage. to provide salt impact assessments as part of a complete application for development which includes new roads and parking lots.</p> <p>Such assessments should include but not be limited to mitigation measures regarding design of parking lots, roads and sidewalks to minimize the need for repeat application of road salt such as designing ponding of parking areas with the goal of reducing salt use; directing stormwater discharge outside of vulnerable areas where possible; and provisions to hire certified contractors.</p>
13. The Handling and Storage of Road Salt	
<p>BC-CW-6.1</p> <p><i>Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-21-v.9 ICA (CHL)</i></p>	<p>To ensure any existing facility for the handling and storage of road salt ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.</p>
<p>BC-CW-6.2</p> <p><i>Future Part IV-Prohibit WHPA-A-v.10</i></p>	<p>To ensure any new facility for the handling and storage of road salt within WHPA 'A', never becomes a significant drinking water threat, where this activity would be a significant drinking water threat this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.</p>
<p>BC-CW-6.3</p> <p><i>Future Part IV-RMP WHPA-B-v.10; IPZ-21-v.9; ICA(CHL)</i></p>	<p>To ensure any new facility for the handling and storage of road salt in the following areas:</p> <ul style="list-style-type: none"> a. WHPA 'B' with a vulnerability score equal to ten (10), or b. Chloride ICA, or c. IPZ-with a vulnerability score of nine (9), <p>never become significant drinking water threats, where these activities would be significant drinking water threats, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.</p>
14. The Storage of Snow	
<p>BC-CW-7.1</p> <p><i>Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10</i></p>	<p>To ensure any existing snow storage within a WHPA 'A' or 'B' with a vulnerability score equal to ten (10), ceases to be a significant drinking water threat, where such an activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.</p>
<p>BC-CW-7.2</p> <p><i>Existing-Future Specify Action/Land IPZ-21-v.9; ICA(CHL/NIT); WHPA-v.2, 4, 6, 8</i></p>	<p>To ensure any existing snow storage within an Chloride or Nitrate ICA, or IPZ with a vulnerability score of nine (9) and a WHPA with a vulnerability score of 8, 6, 4, or 2 ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the County shall encourage best management practices with respect to the handling and storage of snow. and shall amend their Official Plan to include policies that requires new developments to implement best management practices regarding the storage of snow.</p>
<p>BC-CW-7.3</p> <p><i>Future</i></p>	<p>To ensure any new snow handling and storage area never becomes a significant drinking water threat, where this activity would be a significant drinking water threat this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall</p>

Grand River Source Protection Area

SOURCE PROTECTION PLAN

EXPLANATORY DOCUMENT

*Prepared on behalf of:
Lake Erie Region Source Protection Committee*

*Under the Clean Water Act, 2006
(Ontario Regulation 287/07)*

March 12, 2015

6.0 POLICY DEVELOPMENT FOR DUFFERIN COUNTY – TOWNSHIP OF MELANCTHON

6.1 Municipal Support

To date, the municipalities within the Grand River Source Protection Areas have been actively involved with the development of the Source Protection Plan policies.

The Township of Melancthon has been present at various meetings hosted by the Lake Erie Source Protection Region to develop policies that take into account the local situation and needs. These policies have been reviewed by municipal staff and council. Early engagement with the municipal council began in the fall of 2014 with staff presentations and participation at various council meetings.

6.2 Financial Considerations

In reviewing the policies with the Lake Erie Source Protection Region staff, the Township staff evaluated the potential work load for the implementation of these policies. As with other municipalities within the Grand River Source Protection Area, the Township has great concerns about the financial burden implementation might cause for not only the Township but the affected property owners. In the opinion of the Townships, adequate provincial funding is essential to facilitate implementation of these policies.

With respect to education and outreach policies where this is a secondary policy, i.e., not the sole policy addressing a particular significant drinking water threat, the implementation will be dependent on available expertise and budget. As noted above, the Townships remain concerned that the Province appears silent on the matter of finances for implementation.

6.3 Policy Intent and Rational

Within the Lake Erie Source Protection region, policy development was a locally driven process. The Township of Melancthon vulnerability analysis presented in the Grand River Assessment Report confirms that the local geological and hydrogeological conditions create a highly protective drinking water supply for the Shelburne drinking water supply well PW7. Therefore, the area where significant drinking water threat policies apply is limited to, in most cases, the 100 metre zone (WHPA-A) surrounding the municipal well. This area was automatically assigned a vulnerability score of 10 as outlined in the Technical Rules under the *Clean Water Act, 2006*.

Where the policies would extend beyond the 100 metre zone the number of affected properties is low based on current and projected land uses. Policies were developed with this local information in mind and tailored specific to the Township of Melancthon.

To ease implementation for local municipalities, meetings were held between the Lake Erie, South Georgian Bay Lake Simcoe, and municipal staff to refine the source protection plan policies to ensure they are similar in direction across the watershed boundaries. As a result of these meetings the Township of Melancthon policies applicable in the Grand River Source

Protection Area follow similar approaches to those used in the South Georgian Bay Lake Simcoe Source Protection Region.

In development of the policies, the Townships paid specific attention to using existing instruments whenever possible to develop the source protection plan policies. The intent of the policies is to use these existing instruments and ensure they are inclusive of measures to protect drinking water sources. These tools are currently able to effectively manage the risk to drinking water sources in this area. This includes various provincial approvals, land use planning tools, best management practices, and education and outreach programs.

As this is the first round of Source Protection program planning, an assessment will be made in future updates to determine if the current policies met the objectives of the *Clean Water Act, 2006*. More restrictive policies may be drafted in the future based on this review. It is felt by the Township that current practices and programs provided by the Townships and Province protect their municipal drinking water sources, therefore, additional policies more restrictive than current practices are not required at this time.

For the application of road salt to be considered a significant drinking water threat the impervious area must be equal to or greater than 80%. This circumstance does not currently exist within the Township.

6.3.1 Clean Water Act, 2006 Part IV Policies

Section 57 Prohibition

Intent:

These policies are intended to prohibit future activities under section 57 of the *Clean Water Act, 2006* in vulnerable areas where the activities would be a significant drinking water threat. Where applicable, these policies must be incorporated into the Official Plan which is a readily available and accessible policy document. Incorporating a policy regarding the prohibition of these types of activities under the *Clean Water Act, 2006* into the Official Plan supports the Part IV prohibition under the *Clean Water Act, 2006*.

Rationale:

In most cases, as described below, based on a review of current and projected land use in the areas where the following activities could be a significant drinking water threat, in the opinion of the Township and Source Protection Committee these activities are unlikely to occur in the future.

Waste Disposal Sites (that do not require an Environmental Compliance Approval)

The storage of PCB waste, wastes described in clauses p, q, r, s, t, or u of the definition of hazardous waste (O. Reg 347) and hazardous liquid industrial waste do not require an Environmental Compliance Approval under the Environmental Protection Act. The risks presented by the future storage of PCB waste or hazardous liquid industrial waste warrant the future prohibition of these activities. Future waste disposal sites could easily be located outside of the vulnerable area.

The storage of wastes described in clauses p, q, r, s, t, or u of the definition of hazardous waste will be addressed through a targeted education and outreach program.

The application and storage of Agricultural Source Material (ASM)

The applications, handling and storage of Non- Agricultural Source Material (NASM)

The risks presented by the existing and future application and the future storage of ASM in a WHPA-A and the existing and future application, storage and handling of NASM in all significantly vulnerable areas, warrant the prohibition of future occurrences. The *Nutrient Management Act* currently prohibits the application of ASM and NASM within 100 metres of a drinking water well. The proposed policy is consistent with this established policy direction of the *Nutrient Management Act*.

The handling and storage of Commercial Fertilizer and Pesticides

The risks presented by the future handling and storage of commercial fertilizer and pesticides within the vulnerable areas warrant the future prohibition of this activity. Based on a review of the land use, there are alternative locations within the Township where these new activities can locate outside of these vulnerable areas.

The Handling and Storage of Road SaltThe storage of Snow

The risks presented by the future storage of snow and the handling and storage of road salt within the vulnerable areas warrant the future prohibition of this activity. Based on a review of the land use, there are alternative locations within the Townships where these new facilities can locate outside of these vulnerable areas. Further, based on land use this activity is unlikely to take place within these applicable areas.

The handling and storage of FuelThe handling and storage of Dense Non-Aqueous Phase Liquid (DNAPLs)The handling and storage of Organic Solvents

These activities are significant drinking water threats in WHPA- A, and pose a serious risk to drinking water sources. As future activities could be located within 100 metres of the drinking water source, it is important to prohibit these activities. Further, there are alternative locations within the Township where these activities can locate.

The use of land as livestock grazing, or pasturing land, an outdoor confinement area or farm animal yard (O.Reg. 385/08, s.3.)

For those farms not phased in under the *Nutrient Management Act*, or for the activities of livestock grazing or pasturing where the number of animals on the land at any time is sufficient to generate nutrients at an annual rate that is greater than 0.5 NU/acre, prohibition was the preferred approach. There are no existing enumerated occurrences of these activities within WHPA-A and there are alternative location within the Township where these activities could locate in the future.

Section 58 Risk Management Plans

Intent:

The development of Part IV Risk Management Plans under Section 58 of the *Clean Water Act*, 2006 was required to manage certain activities by creating a Risk Management Plan.

Rationale:

Part IV Risk Management Plans under section 58 of the *Clean Water Act, 2006* was used as a tool to effectively manage existing and future drinking water threats through the completion of these plans with the designated Risk Management Official.

Waste Disposal Sites (that do not require an Environmental Compliance Approval)

This policy ensures that existing waste activities which do not require an Environmental Compliance Approval are adequately managed to ensure they are not a risk to drinking water sources. Examples include auto-salvaging facilities and hardware stores that collect hazardous waste for disposal. It was decided that although the policy would result in costs to the implementing body, the use of Risk Management Plans to manage existing storage of waste was the best option to manage the threat, particularly since these activities do not have an Environmental Compliance Approval and the circumstances where this policy would apply are few. There are no enumerated existing occurrences of these types of waste disposal sites within the WHPA-A for Shelburne well PW7.

The storage of wastes described in clauses p, q, r, s, t, or u of the definition of hazardous waste will be addressed through a targeted education and outreach program.

The storage of Agricultural Source Material (ASM)

For existing livestock operations that do not have or do not require a Nutrient Management Plan or Strategy, a Part IV Risk Management Plan is an effective means to regulate the storage of ASM. Existing agricultural operations without a Nutrient Management Plan/Strategy include livestock operations with less than 300 Nutrient Units. It is anticipated that the number of livestock operations that meet these circumstances is nominal and this approach is deemed appropriate. A Risk Management Plan may be similar in nature to a Nutrient Management Plan/Strategy and therefore would be a tool that the agricultural community is familiar with.

The application of Commercial Fertilizer

The application of commercial fertilizer is generally covered under the *Nutrient Management Act*. However, not all agricultural operations or land uses are subject to the *Nutrient Management Act* and traditional land use planning tools can not address the application of fertilizer. As a result, the Township has determined a Risk Management Plan is the most effective tool to manage this activity, particularly where the use/agricultural operation is not subject to the *Nutrient Management Act*.

The handling and storage of Commercial Fertilizer

The handling and storage of commercial fertilizer is generally covered under the *Nutrient Management Act*. However, not all agricultural operations or land uses are subject to the *Nutrient Management Act* and traditional land use planning tools can not address the application of fertilizer. As a result, the Township has determined a Risk Management Plan is the most effective tool to manage any existing occurrences of this activity, particularly where the use/agricultural operation is not subject to the *Nutrient Management Act*.

The application, handling and storage of Pesticides

The existing and future application and the existing handling and storage of pesticides can be effectively addressed through the establishment of Risk Management Plans. Although the policy would result in costs to the municipality, the use of Risk Management Plans to manage the instances where pesticides are applied is the best option to manage this activity. Environmental Compliance Approvals and land use planning tools cannot be used to manage these activities. Given the relatively few existing threats in the Township for this activity, this tool is considered to be the most appropriate to manage this activity. This tool is also preferred over

others (i.e. Part IV prohibition) particularly given the potential negative impacts such restrictions would have on the Township's agricultural community.

The application, handling and storage of road salt

The storage of snow

The existing occurrence of these drinking water threats can be effectively addressed through the use of Part IV Risk Management Plans. It was decided that although the policy would result in costs to the implementing body, the use of Part IV Risk Management Plans to manage existing handling, and storage of road salt and storage of snow was the best option to manage the threat. The goal of management of road salt activities will be to maintain public safety while meeting the objectives of the *Clean Water Act, 2006*.

The handling and storage of Fuel

The Township concluded that the use of Risk Management Plans is the preferred policy direction to address existing occurrences of this threat. Prohibition was not selected as a policy choice because it could potentially create a non-conforming use for the existing activities identified as a threat within the Township. A Risk Management Plan approach is recommended to ensure compliance with the requirements of the *Technical Standards and Safety Act*.

The handling and storage of a dense non aqueous phase liquid (DNAPL) and organic solvents-existing activities

This policy ensures that these activities are adequately managed to ensure they do not become a significant drinking water threat in WHPA- A-C for existing activities. Although the policy would result in costs to the implementing body, the use of Part IV Risk Management Plans to manage the existing instances identified within the Township where dense non-aqueous phase liquid and organic solvents are currently being stored and handled was the best option to manage the threat.

Currently there is no threshold for DNAPLs listed in the Tables of Circumstances. This tool allows for the flexibility to manage this activity depending on the industry and the quantity stored.

Section 59 Restricted Land Use

Intent:

To designate all land uses, with the exception of residential land uses, in areas where significant threat activities may designated for the purposes of Section 57 and/or 58 of the *Clean Water Act, 2006* (WHPA A, B and C), as Restricted Land uses under Section 59 of the *Clean Water Act, 2006* to help ensure that any applicable Part IV tools are considered early in the development process.

Rationale:

These policies were developed to require all applications under the *Planning Act*, *Condominium Act* and *Ontario Building Code Act*, with the exception of those associated with residential uses, within areas where activities are, or would be significant drinking water threat to be reviewed by the Risk Management Official, who would then advise the applicant/landowner if Section 57 (prohibition) or Section 58 (Risk Management Plans) of the *Clean Water Act, 2006* apply.

The policies also enable the Risk Management Official to screen applications for activities identified as a significant drinking water threat within vulnerable areas and make a

determination that the development proposed by a particular *Planning Act* or Building Permit application is not designated for the purposes of Section 59, under specified circumstances. The intent is to allow for the Restricted Land Use process to be refined over time, so that only those applications that are likely to be associated with, or affect, a significant threat activity would require review by the Risk Management Official.

6.3.2 Prescribed Instruments

Ministry of the Environment: Review and Amend Environmental Compliance Approvals

Intent:

The Ministry of the Environment is required to review activities within their approval process to ensure the objectives of the *Clean Water Act, 2006* are met.

Rationale:

This policy relies on the existing responsibility of the Ministry of the Environment to protect drinking water sources. It is a priority of the Townships to use existing regulatory tools when available to address the existing and future threat(s) within the Townships identified in the Assessment Report. Environmental Compliance Approvals have been a longstanding requirement for waste disposal and sewage where the criteria used to assess these certificates are thorough. Requiring the Ministry to review and amend, if necessary, Environmental Compliance Approvals in light of the circumstances that make the activity a significant drinking water threat will serve to ensure that additional terms and conditions are added to Environmental Compliance Approvals where necessary.

Ministry of the Environment: Prohibit Environmental Compliance Approvals

Intent:

The Ministry of the Environment is required to prohibit significant drinking water threats within the Environmental Compliance Approval process to ensure the objectives of the *Clean Water Act, 2006* are met.

Rationale:

Although the Environmental Compliance Approval process is considered to be rigorous, denials of an application is preferred with respect to future waste and select sewage activities, from a policy perspective. This policy would then eliminate the option of allowing these sites to be located within vulnerable areas where significant drinking water threats would occur in the future if the activity were undertaken. The risks presented by these types of facilities warrant prohibition of future occurrences as this policy would only apply to WHPA-A based on the vulnerability scoring. Additionally, in some cases (i.e., Stormwater management facilities) it was felt that since there are no existing threats in the Township that it would be appropriate to prohibit the activity in the future. If these facilities were required, they could be located outside of the highly vulnerable areas.

Ministry of Agriculture, Food and Rural Affairs and Ministry of the Environment: Management –Nutrient Management Plans, Environmental Compliance Approvals

Intent:

The Ministry of the Environment and Ministry of Agriculture, Food and Rural Affairs are required to manage activities within the Environmental Compliance Approval process where they would be significant drinking water threats under Subsection 39 of the *Clean Water Act, 2006*.

Rationale:

This policy relies on the existing responsibility of the Ministry of the Environment and the Ministry of Agriculture, Food and Rural Affairs to protect drinking water sources. It is a priority of the Townships to use existing regulatory tools when available and appropriate to address drinking water threats. Requiring the Ministries to review and amend, if necessary, Environmental Compliance Approvals, and Nutrient Management Plans/Strategies in light of the circumstances that make the activity a significant drinking water threat will serve to ensure that additional terms and conditions are added to Environmental Compliance Approvals, and Nutrient Management Plans/Strategies where necessary to protect drinking water sources.

**Ministry of Agriculture, Food and Rural Affairs and Ministry of the Environment:
Prohibition – Non-Agricultural Source Material Plans, Nutrient Management Plans,
Environmental Compliance Approvals**

E/F Application of ASM
Future storage ASM

Intent:

The Ministry of the Environment and Ministry of Agriculture, Food and Rural Affairs are required to prohibit activities within the Environmental Compliance Approval and *Nutrient Management Act* process where they would be significant drinking water threats.

Rationale:

Comments were provided in the Draft Grand River Source Protection Plan by the Ministry of Agriculture, Food and Rural Affairs asking the Townships to prohibit the application and storage of non- agricultural source material within WHPA- A to be consistent with the prohibition of this activity as outlined in the *Nutrient Management Act*. This policy was included in the Amended Proposed Grand River Source Protection Plan as requested.

These policies rely on the existing responsibilities of the Ministry of the Environment and the Ministry of Agriculture, Food and Rural Affairs to protect drinking water sources. It is a priority of the Townships to use existing regulatory tools when available and appropriate to address drinking water threats. Requiring the Ministries to prohibit the existing and future application of agricultural source material and the future storage of agricultural source materials through the Environmental Compliance Approvals, and/or Nutrient Management Plans/Strategies process in light of the circumstances that make the activity a significant drinking water threat will serve to ensure the protection of municipal drinking water sources.

6.3.3 Land Use Planning**Intent:**

Prohibit and manage activities on specific lands within Official Plans and Zoning by-laws as available under the *Clean Water Act, 2006*. Further, the *Clean Water Act, 2006* requires municipalities to amend Official Plans to reflect land use planning policies in areas where activities could be significant drinking water threats.

Rationale:

It is a priority of the Townships to use existing regulatory tools when available to address the drinking water threat(s). It was confirmed with the Townships that the noted significant drinking water threats could be adequately managed through new land use policy tools including amendments to Official Plans and municipal planning documents based on their local approval process of planning applications and reviews completed by staff before any development

occurs. This includes an amendment of official planning documents to prohibit new facilities. In considering policy options it was determined that locating future storage sites or facilities for the prohibited activities outside of vulnerable areas would not cause undue hardship.

6.3.4 Education and Outreach Programs

Intent:

To request the Townships and the Ministry of the Environment to work with other bodies to develop, continue or enhance stewardship and outreach and education programs directed at any, or all, significant drinking water threat activities prescribed under the *Clean Water Act*, 2006 where it may be deemed necessary.

Rationale:

The Township supports Education and Outreach programs to address all drinking water threats and provide information to the residents of the Township of Melancthon on the protection of drinking water sources. Policy DC-M-CW-1.4 is intended to be a generic policy in terms of introducing and promoting education and outreach at the Township level. Specific education and outreach policies have been developed for certain significant drinking water threats as a complimentary policy.

The storage of wastes described in clauses p, q, r, s, t, and u of the definition of hazardous waste (O. Reg 347) are addressed through an Education and Outreach policy which focuses on the proper handling, storage and disposal of these types of waste. This policy was introduced based on further detail regarding the nature of these threats that was provided by the Ministry of the Environment and Climate Change as part of their review of the plan. At this time the full extent of these types of wastes is unknown. Once the full extent of these types of wastes are understood, the Township may reconsider this policy approach in future updates on the source protection plan. It should be noted the Ministry of Environment and Climate Change appropriately regulate these waste activities.

6.3.5 Incentive Programs

Intent:

Encourage the development and implementation of incentive programs to aid in the implementation of Source Water Protection initiatives.

Rationale:

The purpose of these policies is to express the Township's support for incentive programs to address drinking water threats and their desire for the Province to provide continued funding. Source water protection is a provincial initiative and affects the entire province. Municipalities strongly feel that the Province of Ontario should continue to fund programs such as the Ontario Drinking Water Stewardship Program because this program is one of the most effective tools available to eliminate existing significant drinking water threats.

The incentive policy where the Grand River Conservation Authority is named as the Implementing body is included to specifically address existing drinking water threats and help with the implementation of best management practices to reduce the risk to drinking water.

6.3.6 Specify Action

Sewage Systems and Sewage Works- Septic Systems

The septic system maintenance inspection program supports the implementation of the *Clean Water Act* by providing a consistent approach for determining if on-site sewage systems are

functioning as designed. The intent of the mandatory re-inspection program is to bring all systems in compliance with the Ontario Building Code. Implementing the program will ensure that the existing and future sewage systems within the Township will be inspected as part of this program. This program is required to be implemented by the County of Dufferin as per the changes in the Ontario *Building Code Act*.

The management of runoff that contains chemicals used in the de-icing of aircraft

Based on the location as to where this activity would be a significant drinking water threat, it is not feasible for this activity to occur in the Township based on current land use and size of the land parcels required. If such activity was to occur in the future, the Township would be aware of the Environmental Assessment review process. The *Clean Water Act*, 2006 requires policy to be written to address potential significant drinking water threats even though it is in the opinion of the Township and the Source Protection Committee that these threats are not expected to occur in the future.

The City of Guelph determined that the use of prescribed instruments and Part IV tools was the preferred policy direction to address this threat for existing facilities and new facilities outside of the Wellhead Protection Area –A. Within the Wellhead Protection Area-A, which is directly adjacent to the well, new large-scale manufacturing and warehousing facilities are not permitted. There are alternative locations within the City where these new facilities can locate.

The application, handling and storage of Road Salt

In addition to incorporating the requirement for best management practices for municipal roads through updates to the road salt plans, the use of best management practices for private properties is a priority for the City of Guelph. If appropriate, design elements and best management practices are to be incorporated up in the design of new development, to reduce salt usage over the long term.

Due to the volume of salt required to be stored to meet the threshold of a significant drinking water threat, this threat primarily relates to large municipal and provincial salt storage facilities, the City of Guelph was of the opinion that the most effective method of addressing this storage threat is to use land use planning tools. Prohibition of new facilities was appropriate in the vulnerable areas as alternative locations are available for this type of facility. **There are no enumerated existing occurrences of handling or storage of road salt where it would be significant drinking water threat within the City of Guelph wellhead protection areas.**

The Storage of Snow

The City of Guelph will require best practices for the management of snow storage and the associated melt water as part of the approval process for site plan applications for development with parking lots, such as multiple residential or commercial developments. Historical design has been for melt water to run across parking lots to a central catch basin, which in turn requires the application of more road salt due to icing. The location for stockpiling of snow and impact of drainage on salt application requirements should be considered.

The handling and storage of fuel

The Official Plan is a readily available and accessible policy document and incorporating a policy regarding the prohibition of new or expanded retail gas stations and bulk fuel storage facilities excluding bulk fuel storage associated with a municipal emergency generator facility within Wellhead Protection Area-A into the Official Plan supports the Part IV tools under the *Clean Water Act*.

The handling and storage of Dense Non- Aqueous Phase Liquids (DNAPLs)

The City of Guelph determined that the use of Part IV tools was the preferred policy direction to address this threat for existing facilities and new facilities. The Official Plan is a readily available and accessible policy document incorporating a policy regarding the prohibition of facilities with the handling and storage of dense non-aqueous phase liquids within Wellhead Protection Area-A into the Official Plan supports the Part IV tools under the *Clean Water Act*.

The handling and storage of Organic Solvents

The City of Guelph determined that the use of Part IV tools was the preferred policy direction to address this threat for existing facilities and new facilities. The Official Plan is a readily available and accessible policy document and incorporating a policy regarding the prohibition of facilities with the handling and storage of organic solvents facilities within Wellhead Protection Area-A into the Official Plan supports the Part IV tools under the *Clean Water Act*.

Conditions

12.0 POLICY DEVELOPMENT WITHIN THE REGIONAL MUNICIPALITY OF WATERLOO

11.1 Municipal Support

To date, the municipalities within the Grand River Source Protection Area and the Grand River Conservation Authority have been actively involved with the development of the Source Protection Plan policies. In the Regional Municipality of Waterloo, this participation has extended over many years including early consultation on the Clean Water Act itself and on the development of the Terms of Reference and Assessment Report. Regional Municipality of Waterloo staff have prepared several reports to Regional Council and hosted public information sessions in the lead up to policy development. The Regional Municipality of Waterloo also requested and was designated to take the lead in policy development for its protection areas on behalf of the Source Protection Committee.

As set out within Section 8 of the 2010 Regional Municipality of Waterloo's Official Plan, "Waterloo Region is unique in Ontario in that it is the largest urban municipality to rely almost exclusively on groundwater supplies for its drinking water. Approximately three quarters of the Region's drinking water comes from over 100 municipal wells. The remaining quarter of the Region's drinking water is drawn from the Grand River. Protecting these valuable water resources from contamination and from land uses that could hinder groundwater recharge is essential to maintaining human health, economic prosperity and a high quality of life in the Region."

The Region has acknowledged this unique situation for almost two decades through its leadership and implementation of its Water Resource Protection Master Plan (2007). Initiated in 1994, the Master Plan has been a cornerstone of the Regional Municipality of Waterloo's approach to drinking water management. The Master Plan, which was updated in 2007, included tasks to integrate the Plan with the objectives and other requirements of the *Clean Water Act*. The knowledge and experience gained through the implementation of the Master Plan has raised awareness of the need for source protection with the public and Area Municipalities. Previous experience in program implementation including development of land-use planning policies, incentive and education programs, and direct stakeholder interaction was critical in understanding the potential impacts of policies that might be developed under the *Clean Water Act*.

Building from existing networks, an "early engagement" process was initiated specifically for the Area Municipalities that would be affected by the policies prior to the Source Protection Plan being released for official public consultation. This process provided the municipalities with the opportunity to shape the source protection policies with regard to implementation and the available resources.

In September/November 2011, a summary of general principles and approaches being considered by Regional Municipality of Waterloo staff to develop the policies was presented to Regional Council (E-11-102). The principles that guided the development of risk reduction policies were:

- Consider previous source protection program implementation experience and align with approaches in the Water Resources Protection Master Plan.
- More protective policies closer to the well.

- More protective policies for threats associated with an issue.
- Enable voluntary compliance prior to mandatory compliance.
- Consistent approach to policies for various threats.
- Policies using existing prescribed instruments and local incentive/education programs should be considered as a priority to achieve objectives. Where these do not exist, policies that could facilitate implementation through new, local programs should be developed, followed by policies that require risk management plans and/or education/awareness programs.
- Compliance dates should be staggered over a 5 year period to minimize impact.
- Policies for existing activities must allow for required changes to be implemented in a reasonable time frame. Financial incentives could be considered to assist.
- Financial impact to property owners, including municipalities and the Grand River Conservation Authority is an important consideration.

As part of the policy development process, Regional Municipality of Waterloo staff consulted with local municipal staff and the school boards through the existing Source Water Protection Liaison Committee (formerly the Water Resources Protection Liaison Committee), and held three Public Information Sessions. This Committee has been an integral component of the Master Plan and has provided support and guidance to Regional Municipality of Waterloo staff as part of the Master Plan's implementation. In addition, presentations were made to the Kitchener-Waterloo Chamber of Commerce and Area Municipal councils at Cambridge, Kitchener, Waterloo, Wilmot and Woolwich. Regional Municipality of Waterloo staff also met directly with numerous department managers and directors in Cambridge, Kitchener, and Waterloo to discuss the policies.

A first draft of the policies was presented to Regional Council in January 2012 (E-12-012). Changes to these policies have occurred in response to additional guidance from the Ministry of Environment, feedback from Area Municipal and Regional Municipality of Waterloo staff, and as part of the regulated pre-consultation with implementing agencies. Formal pre-consultation was required for all agencies with implementation responsibilities including: the Province (Environment, Natural Resources, Municipal Affairs and Housing, Transportation, Infrastructure), Area Municipalities, including the City of Brantford and Wellington County, and the Grand River Conservation Authority. Feedback provided through these organizations and groups were considered.

Draft policies have been reformatted to more closely align with other jurisdiction's policies in the draft Source Protection Plan and to facilitate inclusion in the Regional Municipality of Waterloo Official Plan. This reformatting has improved the readability and reduced the total number of policies. While most of the policies continue to rely on risk management plans and prescribed instrument tools enabled by the *Clean Water Act*, several changes were made in response to consultation including: transition policies that will recognize some planning approval to enable the activity to be treated as existing rather than future; limiting the scope of policies in surface water areas contributing to wells to that of spill preparedness; adding new policies for the Mannheim Water Treatment Plant Intake in the Grand River; and adding new policies for Brantford's intake protection zones where they occur within the Region. The final draft policies for Regional Municipality of Waterloo were presented to council in August 2012 (E12-102).

The proposed plan was further circulated by the Grand River Conservation Authority and additional comments were received from the Province. Revisions to the policies were undertaken in response to these comments, to address opportunities to improve readability and

ease of understanding of the policies and to ensure that any policy gaps were removed. The following is a summary of the major changes to the policies.

Major Changes to Proposed Source Protection Policies for Waterloo Region

Policy Number	Change Made
General	<ul style="list-style-type: none"> Removed duplication of policies referencing applies in WHPA –A and WHPA-A where there is an issue. Added policies to ensure all existing and future threats had policies even though there were no enumerated existing threats and/or future threats were impossible due to land use, build out and/or zoning. Reformatted most threat-specific policies into existing and future circumstances and in some cases by sub-threat to improve readability. Changed wording in policies that applied in Nitrate ICAs from WHPA to ICA to address a policy gap (i.e. the ICA for some nitrate ICAs lies outside WHPAs). Changed wording in all education policies to include new threats as well as existing to address a policy gap.
Definitions	<ul style="list-style-type: none"> Revised definition of existing in response to MOECC comments and added a clause requiring operation for 5 years after approval of the plan to ensure existing status will apply in a future plan. Added term “equal to” for size of large and small parking lots.
1.11	<ul style="list-style-type: none"> This policy was deleted as changes required to address MOECC comments duplicated intent of policy 1.12.
1.12	<ul style="list-style-type: none"> Changed to address MOECC comments to be less prescriptive where requiring MOE to report: reduced scope of what was being asked and used “should” for summary report.
1.15	<ul style="list-style-type: none"> Changed to address MOECC comments and consistency across the Grand River plan.
1.16 and 1.17	<ul style="list-style-type: none"> Condition policies were discussed with MOECC and revised to become mutually agreeable.
1.18	<ul style="list-style-type: none"> Minor wording change to indicate the area municipal contaminated site protocols were to be similar to Waterloo Region’s protocol.
2 (Waste)	<ul style="list-style-type: none"> Removed reference to hazardous wastes defined as p,q,r,s,t,u wastes and moved them to CW-5. Moved PCB wastes to new policy CW-2.c to enable PCB destruction ECAs. Added policy application to WHPA C (vulnerability = 8) e.g. 2.a.ii for some waste categories where threats are significant to address a policy gap.
3 and 4 (Waste, no ECA)	<ul style="list-style-type: none"> Reformatted to explicitly list waste subcategories to mirror CW-2. Added that some subthreats were applicable in IPZ-1, WHPA-E and IPZ-3 to address policy gaps.
5 (Waste)	<ul style="list-style-type: none"> Added hazardous wastes defined as p,q,r,s,t,u wastes to education policy and added that it was applicable in IPZ-1 to address a policy

	gap.
6 to 9 (Sewage - septic)	<ul style="list-style-type: none"> Removed clause to be consistent with circumstances as septic policies do not apply in IPZ-1. Added that education policy 8.1.b.i which applies in WHPA E vulnerability less than 8 to address a policy gap.
11 (Sewage – storage & discharge)	<ul style="list-style-type: none"> Major reformatting to separate existing/future and five specific subthreats. Split policy in MC-11 which is for prohibitions and MC11.1 which is for management though environmental compliance approvals. Added applicability in IPZ-1 for sewage treatment plants and industrial effluent discharges to address a policy gap. Identified several policy gaps and added prescribed instrument policies to address. Added that policies apply for TCE issues for storage of sewage and industrial effluent discharge to address a policy gap.
12 and 13 (Sewage – sanitary & combined)	<ul style="list-style-type: none"> Major reformatting and reinterpretation of where policies apply. Spilt into MC-12 for sanitary sewers and MC-13 for combined sewers. Sanitary sewer policies apply in WHPA A/B (vulnerability =10) and for nitrate issues (vulnerability >=6), whereas combined sewers only apply in IPZ-1 WHPA E (vulnerability >8) and IPZ-3. Region staff understand there are no combined sewers. Added clause to require enhance construction measures for sanitary sewers in WHPA-A.
14 (Sewage – sanitary & combined)	<ul style="list-style-type: none"> Narrowed where the policy applies to avoid duplication with prescribed instrument policies.
15 to 20 (Sewage – stormawter)	<ul style="list-style-type: none"> Removed application of policy for sodium issues since not significant for stormwater. Added that policies apply in IPZ-1 to address a policy gap. Separated existing from future in CW-20.b. Added that policy MC-19 re. inventory of systems also applies in WHPA- A to address a policy gap .
21 to 23 (ASM)	<ul style="list-style-type: none"> Major reformatted to separate existing/future and three specific subthreats. Added that policies apply in IPZ-1 to address a policy gap. Added prohibition of ASM application in WHPA-A in CW-21. Expanded the requirement for ECA revisions or RMP negotiation for storage of ASM in ICAs from vulnerability 8 to 6. Added applicability in WHPA E (vulnerability = 8.1) in policies MC 22 and MC 23 even though these areas do not overlay agricultural areas. Added some additional wording to explicitly identify all requirements of the Risk Management Plan for K26 in MC-23 to address a policy gap.
25 (NASM)	<ul style="list-style-type: none"> Major reformatting to separate existing/future and two specific subthreats. Changed policy from a Section 57 prohibition to at ECA prohibition to reflect that all application of NASM occurs through ECAs.
26 and 27	<ul style="list-style-type: none"> Major reformatted policies to separate existing/future and two specific subthreats.

(NASM)	<ul style="list-style-type: none"> Added applicability in WHPA E (vulnerability = 8.1) even though these areas do not overlap with agricultural areas to address a policy gap. Added policy to require update of ECA in ICA where there is a nitrate issue to address a policy gap.
28 (Fertilizer)	<ul style="list-style-type: none"> Added prohibition of existing storage of commercial fertilizer in WHPA A to address a policy gap.
29 (Fertilizer)	<ul style="list-style-type: none"> Major reformatted policies to separate existing/future and two specific subthreats. Added policy to require RMP for handling/storage where nitrate issue in WHPA (vulnerability ≥ 6 instead of ≥ 8) to address a policy gap. Added applicability in IPZ-1 for application to address a policy gap. Moved future application from prohibition to manage.
32 (Pesticide)	<ul style="list-style-type: none"> Reformatted policies to separate existing/future and two specific subthreats. Added policies to be applicable in IPZ-1 and WHPA-E (vulnerability = 8.1) to address a policy gap.
34 (Salt)	<ul style="list-style-type: none"> Major reformatting to separate existing/future policies. Renumbered MC-34 to apply to application and MC-34.1 to apply to storage and handling. Identified several policy gaps and added RMP policies to address. Clarified that uncovered/handling storage circumstance and related volume threshold only applies where wells have a sodium or chloride issue.
35 (Salt)	<ul style="list-style-type: none"> Major reformatting to separate existing/future policies. Renumbered MC-35 to apply to application and MC-35.1 to apply to storage and handling. Identified several policy gaps and added RMP policies to address. Added policies requiring RMP for storage/handling in ICAs (vulnerability ≥ 6) for quantities greater than 1 tonne/1000 L to address a policy gap.
36 (Salt)	<ul style="list-style-type: none"> Reformatted. Added applicability for sodium and chloride issues in ICA (vulnerability ≥ 6) and WHPA-E (vulnerability ≥ 6) to address a policy gaps.
37 (Salt)	<ul style="list-style-type: none"> Reformatted. Added applicable in IPZ-1 to address a policy gap.
41 and 42 (Snow)	<ul style="list-style-type: none"> Major reformatting to separate existing/future policies and consolidated policies for nitrate, sodium and chloride issues. Removed reference to area threshold where no ICA. Combined above ground and below ground storage policies in ICAs into a single area threshold. Area thresholds changed to a single value for prohibition where there are nitrate, sodium or chloride issues ($>0.5\text{Ha}$) in MC-41 and range of values for RMP (0.05 to 0.5) in MC-42. Changed area where RMP required for nitrate issue to be the same as for chloride/sodium (vulnerability ≥ 6).
45 (Fuel)	<ul style="list-style-type: none"> Major reformatting to separate existing/future policies and four subthreats. Removed reference to single family dwelling in introductory paragraph and explicitly wrote policies for fuel oil where appropriate.

	<ul style="list-style-type: none"> Removed volume references as these are dictated by the table of circumstance.
46 (Fuel)	<ul style="list-style-type: none"> Major reformatting to separate existing/future policies and four subthreats. Added specific RMP policies to apply to municipal supply generators in WHPA-A to address a policy gap. Added RMP application in several areas to address policy gaps.
48 (Fuel)	<ul style="list-style-type: none"> Made minor editorial changes including application in WHPA A and the policy applies to fuel oil in clause a, and applies to property owners rather than homeowners in clause b.
50 and 51 (DNAPL)	<ul style="list-style-type: none"> Reformatted policies to separate existing/future and handling/storage. Clarified that policies in TCE ICAs only applies for compounds associated with TCE. Clarified applicability of policies where RMPS will be required for no issue (vulnerability ≥ 8) and for TCE issue (vulnerability ≥ 6).
54 and 55 (Solvents)	<ul style="list-style-type: none"> Reformatted policies to separate existing/future and handling/storage. Create new policy MC-55.1 to address a policy gap for incentive policy for solvents.
56 (Aircraft De-icing)	<ul style="list-style-type: none"> Reworded policy to specific that RMPS was required for existing activity in areas where significant in accordance with the table of circumstances.
57 and 58 (Livestock)	<ul style="list-style-type: none"> Reformatted policies to separate existing/future and two subthreats. Added policy to prohibit existing confinement yards in WHPA-A to address a policy gap. Reduced prohibition of new confinement yards to WHPA-A but expanded in the WHPA-B (vulnerability ≥ 10) where there is a nitrate issue. Added requirement for RMP for confinement yards where nitrate ICA WHPA-E (vulnerability ≥ 6) and in IPZ-1. Added requirement for RMP for grazing in nitrate ICA (vulnerability ≥ 8) and applicable in WHPA E (vulnerability ≥ 8) to address a policy gap.
60 (Livestock)	<ul style="list-style-type: none"> Added applicability in WHPA-E (vulnerability ≥ 8.1) to address a policy gap.

12.2 Financial Considerations

One of the specific requirements for an explanatory document is to advise how consideration of the potential financial implications for persons and bodies that would be implementing or affected by the source protection plan influenced the development of policies. These considerations are discussed below.

As presented in the previous section, the Regional Municipality of Waterloo has gained considerable insight on the impacts of source protection through the implementation of the Water Resources Protection Master Plan. This experience also provides the basis on which financial impacts were assessed. Specifically, financial awareness was created through a number of initiatives as follows:

- Implementing source-protection based incentive programs to farmers for 15 years and urban businesses for five years. These programs include an approval process that includes implementation costs and use the principle that the property owner may accrue a financial benefit from the improved practices and so should contribute to the cost of the new practice;
- Designing and implementing a private parking lot maintenance accreditation program that utilized the cost and potential liability associated with winter maintenance programs;
- Implementing source protection based land-use policies through development applications;
- An assessment of road salt impacts at a supply well concluded that salt concentrations in supply wells are achievable at a modest cost with improved management practices and equipment upgrades. This study led to the development of a salt management program for municipal road agencies that includes assessment and implementation of new practices. This study also provided critical insight on the Region's tiered approach to source protection as the largest improvements in water quality came from changes in practices closer to the wells; and
- A cost-benefit analysis of the potential for decreasing concentration of nitrate in a well with a nitrate drinking water issue through changes in agricultural management practices. This study again supported the Regional Municipality of Waterloo's tiered approach to source protection and identified specific practices that could be implemented to improve the cost at a reasonable cost.

This previous experience enabled staff to assess and give substantial consideration to the potential costs and impact to the business and residents of the Regional Municipality of Waterloo as part of the decision making process in developing the Source Protection Plan policies. In essence, it was felt that the cost for implementation should be shared across all those affected by the policies. The policy framework is based on the principle of utilizing prescribed instruments first to place the onus on the provincial agency responsible for issuing prescribed instruments such as *Environmental Compliance Approvals* to protect municipal water supplies using provincial legislation. Financially, this will assist in spreading implementation cost across provincial and municipal agencies. The financial impacts to municipalities for implementation and property ownership within Regional Municipality of Waterloo are set out in detail within Staff Report E-12-075. Additional costs are projected to be incurred by the Regional Municipality of Waterloo and Area Municipalities. These impacts include cost for mitigating risk on municipal properties, new resources for undertaking the responsibilities for the Risk Management Official, and incentive and education program implementation.

A number of Regional Municipality of Waterloo and Area Municipal properties have been identified as significant drinking water threats. These threats include application of salt on road and parking lots, stormwater management facilities, snow storage sites, and septic systems. The yearly costs to implement source protection for these properties are estimated to range from zero (North Dumfries, Wellesley, and Woolwich do not own properties with significant drinking water threats) to approximately \$207,000 for Kitchener. The costs vary for each agency primarily by the threat type and the number of properties.

Throughout the consultation on the draft policies, concern was raised by Area Municipal staff on the potential inadvertent consequences of amending existing Environmental Compliance Approvals for stormwater management facility and sanitary sewers. These concerns centred on the lack of specificity in what would be required with these amendments and that the regulatory agency could include requirements within these amendments beyond what was envisioned

during the development of the policies. This concern made it difficult to predict the financial impact for these policies or assess the risk that the cost could be considerably higher than estimated. To address this, policies were added for these threats directing Area Municipalities to undertake a preliminary assessment of these structures that would assist in guiding both the Municipality and the Province on the extent to which risk reduction is necessary. The policies also include specific minimum content to guide the approval authority on the scope of measures Regional Municipality of Waterloo staff had envisioned would be required to meet the intent of the *Clean Water Act*.

Area Municipal staff also raised concerns regarding the proposal salt management policies regarding the specific language of the policies and the potential implications of implementing the policies. Many of the policies have been rewritten to improve the readability. Region staff have been working with all local municipal transportation staff included Cambridge to voluntarily develop RMPs for application of road salt as a means of improving understanding of the scope of management envisioned by Region staff. This will assist in managing the cost of implementing the policies.

Implementing the tasks of the Risk Management Official Office is a new responsibility for the Regional Municipality of Waterloo. Accordingly, Regional Municipality of Waterloo staff has undertaken an assessment of the financial and staffing implications needed to implement these functions. In total, 4 full-time staff will be dedicated to implement these duties, the costs of which will be born by the Regional Municipality of Waterloo. In addition, contract staff may be needed in the first few years to assist in dealing with the large number of existing threats that will need risk management plans. Finally, substantial legal support is anticipated to guide negotiations of the risk management plans and assist in appeals that will undoubtedly emerge with this new legislation. The fees that may be charged to persons applying for building permits or development applications may partially offset these costs.

The Risk Management Official will be required to provide notice to and sign off on risk management plans before applicants can initiate the development and building permit application processes where the development includes significant threat activities in well head protection areas. Municipalities have expressed concern that inclusion of this additional process within the development and building permit process will result in additional approval delays and potential additional costs to both city staff and the developer or applicant. Regional Municipality of Waterloo staff is committed to consulting further with each Area Municipality in developing and integrating this process into existing municipal approval processes.

The proposed incentive program will help support the transition and/or upgrades that will be required to reduce the risk to supply wells. For wells with drinking water issues, stand-alone incentive or education policies are proposed, as part of the Regional Municipality of Waterloo's tiered approach, for the outer reaches of the issue contributing areas as it was felt that the main risk reduction emphasis was needed for properties closer to the supply well.

It is proposed that the incentive program be implemented over ten years to spread out the cost to the Regional Municipality of Waterloo and in recognition of the challenges in implementing incentives to several thousand properties. Education and awareness programs will be linked with the proposed incentive programs and will be developed and run parallel to these programs. The estimated cost for these programs is built on the continued availability of funds from the *Clean Water Act*, 2006 Stewardship Program. In the event that the Province discontinues or

reduces the availability of funds, the cost share and maximum amounts will need to be revisited. It is hoped that the scope of the stewardship program will be known before the Province approves the Source Protection Plan. Incentives will be developed for source water protection measures in accordance with applicable legislation.

Area Municipalities will be responsible for implementing septic system inspections in source protection areas in accordance with the Building Code. The cost for this program will be borne by the municipality and may be partially offset by administration fees charged to the property owner.

12.3 Policy Intent and Rationale

Section 9.1 of the Source Protection Plan contains definitions that apply within the Regional Municipality of Waterloo. Section 9.2 contains general policies that enable specific provisions under the *Clean Water Act, 2006* regarding regulated activities and restricted land uses. The provisions of the *Clean Water Act, 2006* require this language to be contained within the Source Protection Plan. These policies set out the timing for various sections to come into effect, the transition provisions and how *Planning Act* and Building Permit applications should be handled when the Source Protection Plan comes into effect and annual reporting requirements. These policies are an integral component of the Plan and must be consulted to understand the full effect of the policies regarding significant drinking water activities.

Regarding the definitions of existing and future use, a more restrictive approach has been used in developing the definition of existing than found in other sections of the Grand River Source Protection Plan. The definition permits activities that have legally occurred within the last five years as well as ongoing activities on the date of approval of the Source Protection Plan. There is no intent or desire to provide greater grandfathering of activities that once legally existed in the past but have now ceased operations. If these activities have ceased and want to reestablish the activity, they will be required to conform to the future threat policies. A number of the wellheads within the Regional Municipality of Waterloo are located within commercial, industrial or employment areas. These areas have a long history of a variety of land uses. Providing additional timelines beyond the five-year period as set out within the definition for existing would increase the potential risk of activities that have ceased being permitted to reoccur next to well heads.

The same principles were used in the development of the transition policies. The policies allow an active application for site plan or building permit application to continue to be processed under the existing activity policies. If the property only has zoning approval and no active development application, any new activities on that property must conform to the future use policies within the Plan. It is also recognized that Environmental Compliance Approvals may be required for the development to proceed and that those can be approved as an existing activity under this policy.

Throughout the preparation of the Source Protection Plan ongoing dialogue has occurred with the Ministry of Environment and other Provincial Ministries regarding requirement of the Regional Municipality of Waterloo to have a more interactive consultation process with the Ministries when they are reviewing a prescribed instrument.

The Regional Municipality of Waterloo expects that due consideration be given to comments provided by the Region to the Province in that process. RW-NB-1.21 and RW-MC-1.26 are included within the Plan to address these requirements of the Regional Municipality of Waterloo. Also found within this section are the condition policies. A condition is a site with contamination that is the result of past activities. The Regional Municipality of Waterloo has identified a

comprehensive policy approach for addressing conditions through a combination of a number of policy tools. The use of prescribed instruments is the preferred tool where there is one available. This is supported by the requirement for an environmental screening process for new development applications as well as increased communication and data sharing.

During the consultation process on the draft Source Protection Plan, comments were received from the Ministry of Environment regarding prescribed instruments in general and Condition Sites specifically and the inclusion of terms and conditions for the approval of Prescribed Instruments. The purpose of the Clean Water Act is “to protect existing and future sources of drinking water”. Sections 39(7) and 43(1) set out the scope of revisions to prescribed instruments. The Clean Water Act does not limit the authority of the Source Protection Committee or Source Protection Plans to require the Ministry of Environment to include required terms and conditions in an Environmental Compliance Approval.

Concerns were also raised by the Ministry of Environment regarding the monitoring policies and the documents requested. As set out in Section 87(1), the Clean Water Act permits the Regional Municipality of Waterloo to request copies of the amended Environmental Compliance Approvals as required in policy RW-CW-1.11. The Clean Water Act does not limit the authority of the Source Protection Committee or Source Protection Plans to require the Ministry of Environment to undertake actions. There is no requirement to provide operational flexibility to the Ministry of Environment. There is no requirement to avoid policies that will require the Ministry of Environment to make program changes and there is no requirement to provide general language in monitoring policies. The Regional Municipality of Waterloo supports the policies within the Source Protection Plan regarding these matters as presented.

Regarding transport pathways (policy RW-NB-1.23), O.Reg. 287/07 sets out in Section 1(1) the definition of a transport pathway. A transport pathway is a condition of land resulting from human activity that increases the vulnerability of a raw water supply of a drinking water system. The policy requires the assessment of the establishment of the transport pathway in conjunction with development applications. The requirement to perform certain studies or investigations prior to granting land use planning approvals or amendments is a common practice.

Within the plan, policies have been included for existing threats that have not yet been enumerated through the Assessment Report. These policies have been included within the plan to ensure that all existing activities, whether enumerated or not, are addressed within the policies.

In addition there are a limited numbers of the policies address existing uses that are prohibited under the policies of the plan. As set out within the table below, none of these existing activities are verified in the field and it is unlikely that the activity is occurring within the area where the activity is a significant drinking water threat. In addition, for a significant number of the activities below, these activities are not permitted through other legislation and regulation. The rationale for the prohibition of existing uses is set out in detail within each of the sections below. The properties affected were contacted as part of the stakeholder consultation through an invitation to four public meetings hosted by the Region of Waterloo in 2012 and two additional public meetings hosted by the Grand River Conservation Authority in 2012.

Prohibited Existing Activities						
Significant Drinking Water Threat Activities	Subthreat	Policy	Area	# Enumerated Threats	Comments	Date Completed

3. The Application of Agricultural Source Material		RW-CW-21	WHPA-A IPZ-1	16	Not verified: only aware that ASM application occurs on property. For 15 properties the WHPA represents <10% of the field: one represents 25%. No threats in IPZ-1.	Same for all threats: 2009 census and 2013 air photo review.
4. The Storage of Agricultural Source Material	Permanent storage	RW-CW-21	WHPA-A	1	Not verified: storage occurs in one of two barns only one of which is in WHPA-A	
4. The Storage of Agricultural Source Material	temporary field storage	RW-CW-21	WHPA-A WHPA-B (V=10) WHPA-E (V=8.1) ICA NIT (all)	0	Not verified.	
6. The Application of Non-Agricultural Source Material (NASM)		RW-CW-25	WHPA-A IPZ-1	2	Not verified. Self declaration in Census but may not be happening within vulnerable area.	
7. The Handling and Storage of Non-Agricultural Source Material (NASM)		RW-CW-25	WHPA-A IPZ-1	0		
9. The Handling and Storage of Commerical Fertilizer		RW-CW-28	WHPA-A	1	Not verified: commercial storage building likely not in vulnerable area.	
13. The Handling and Storage of Road Salt		RW-CW-34	WHPA-A IPZ 1	0		
13. The Handling and Storage of Road Salt	uncovered >1 tonne or 1000 L brine	RW-CW-34	ICA CHL (v >=6) ICA SOD (v >=6)	0		

14. The Storage of Snow		RW-CW-41	WHPA-A WHPA-B (v=10) IPZ 1	0		
14. The Storage of Snow	area greater than 0.5 Ha	RW-CW-41	ICA NIT (v >=6) ICA CHL (v >=6) ICA SOD (v >=6)	4	Not verified. Self declaration in Census but information suggests it is associated with their own parking lot maintenance which Region staff will deal with through Salt Application RMPs.	
15. The Handling and Storage of Fuel	below grade liquid fuel	RW-CW-45	WHPA-A	0		
16. The Handling and Storage of a Dense Non-Aqueous Phase Liquid (DNAPLs)		RW-CW-50	WHPA-A	1	Not verified: uncertain whether declaration in census was valid given lack of education on what these substances are named.	
17. The Handling and Storage of an Organic Solvent	below grade	RW-CW-54	WHPA-A	0		
21. The Use of Land As Livestock Grazing or Pasturing Land, an Outdoor Confinement Area or a Farm Animal Yard	outdoor confinement area	RW-CW-57	WHPA-A	1	Not verified: animal yard present on air photo but self declaration says no livestock present.	

12.3.1 Part IV Policies

Waste Disposal Site

For those facilities not regulated by prescribed instruments, the use of the Part IV tools to prohibit future and manage the risk from existing occurrences of this threat was preferred. The areas where prohibition and management are required are consistent with the Region's tiered approach to risk reduction and implement the same risk reduction approach as prescribed instruments. Prohibiting future occurrences of this threat ensure the cumulative risk to the well is not increased. Risk Management Plans provide an opportunity to effectively implement best management practices for existing significant drinking water threat activities related to waste

disposal. It is not envisioned that there will be many circumstances where this policy will be applied.

Sewage System or Works – Stormwater Discharge from a Stormwater Management Facility

For those facilities not regulated by prescribed instruments, the use of the new Part IV tools to prohibit future and manage the risk from existing occurrences of this threat was preferred. The protection areas where prohibition and management are required are consistent with the Regional Municipality of Waterloo's tiered approach to risk reduction and require the same risk reduction approach as that drafted to prescribed instruments. Prohibiting future occurrences of this threat ensure the cumulative risk to the well is not increased. Risk Management Plans provide an opportunity to effectively deal with significant drinking water threat activities related to stormwater discharge. Details related to the content and purpose of the risk management plan assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. It is not envisioned that there will be many circumstances where this policy will be applied.

The application and storage of Agricultural Source Material

In general, the Regional Municipality of Waterloo's approach to risk mitigation is based on the principle of a tiered approach to risk reduction with more restrictive measures closer to the well. Accordingly, the risks posed by this threat warrant prohibition of these activities where it is an existing threat or could be a future threat in areas closest to the wells. A number of factors were considered, and were relied upon by the Source Protection Committee in determining that this threat warranted prohibition and could not be effectively managed to reduce the risk. These included the following:

- Delineation and scoring of the 100 m area around the well recognizes that inherent uncertainty exists in the subsurface soils, which precludes delineation and scoring of multiple vulnerability zones;
- Agricultural Source Material includes pathogens whereby one pathogen could result in immediate health impacts;
- Management of this threat cannot reduce numbers of pathogens to zero thereby eliminating the threat and potential adverse effects;
- For application, the chemicals and pathogens reach the subsurface through direct and designed application ;
- For storage, in the event of a spill there might not be sufficient time to respond as the storage facility is within 100 m of the well and the quantity of pathogens could overwhelm the treatment system at the well;
- Chemicals associated with this threat have already affected the drinking water quality in the well as there is a designated drinking water Issue and more restrictive risk-reduction measures are needed to reduce the risk; and
- The *Nutrient Management Act* acknowledges that the risk from this activity is high by prohibiting it within 100 m of a municipal drinking water source.

In addition, as there are alternatives available to the property owner for application of Agricultural Source Material to ensure viable crop production via the application of commercial fertilizers, it is felt that this prohibition would be acceptable to property owners. Regional Municipality of Waterloo staff have undertaken measures to assess whether this activity is occurring and concluded that they are not aware of its occurrence; however, there may be omissions in the Region's data.

The approach to prohibiting existing and/or future Agricultural Source Material application, temporary field storage and/or permanent storage within Wellhead Protection Areas A and B and E, within Intake Protection Zone 1 as well as where there is a Nitrate Issue is part of the Region's tiered approach to risk reduction that has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive measures closest to the well and in the highest vulnerable areas with decreasing levels of restriction in other areas. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems. Finally, the policies prohibit temporary field storage in Issue Contributing Areas as Regional Municipality of Waterloo does not consider this to be an acceptable management practices.

The policy approach also utilizes the Risk Management Official's responsibilities to manage in both existing and future activities within Wellhead Protection Area B and E and where a Nitrate Issue has been identified in all Issue Contributing Areas except Wellhead Protection Area A. Use of this tool recognizes that the Nutrient Management Plans required through the *Nutrient Management Act* are not required for many existing farms in the Regional Municipality of Waterloo and that nutrient management is necessary to reduce the risk from this threat. Details related to the purpose or content of the tool assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Most agricultural properties have utilized a variety of activities over the past and few activities will be considered to be a future threat.

Review of the Wellhead Protection Area and or Issue Contributing Area extent and vulnerability has identified that management of the risk in areas where vulnerability is greater than 6 is necessary for wells which have drinking water issues to reduce the impact of this threat at the drinking water intake. Detailed technical studies at K26 have indicated that soil nitrate testing is needed to ensure nutrient management plans achieve the desired risk reduction goals for nitrogen. An economic cost-benefit analysis was undertaken by the Regional Municipality of Waterloo and determined that this additional measure was appropriate and could be implemented at the least cost.

The application, handling and storage of Non-Agricultural Source Material to land

In general, the Region's approach to risk mitigation is based on the principle of not increasing the risk by adding new threats and a tiered approach to risk reduction with more restrictive measures closer to the well. Accordingly, the Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose existing and future significant threats within Wellhead Protection Areas A and Intake Protection Zone 1. The risks posed by this threat warrant prohibition of these activities where it could be a future threat in areas closer to the wells and where it is an existing threat within a Wellhead Protection Area A. A number of factors were considered and were relied upon by the Source Protection Committee in determining that this threat warranted prohibition and could not be effectively managed to reduce the risk. These included the following:

- Delineation and scoring of the 100 m area around the well recognizes that inherent uncertainty exists in the subsurface soils, which precludes delineation and scoring of multiple vulnerability zones;
- Non Agricultural Source Material includes pathogens whereby one pathogen could result in immediate health impacts;
- Management of this threat cannot reduce numbers of pathogens to zero thereby eliminating the threat and potential adverse effects;

- For application, the chemicals and pathogens reach the subsurface through direct and designed application;
- For storage, in the event of a spill there might not be sufficient time to respond as the storage facility is within 100 m of the well and the quantity of pathogens could overwhelm the treatment system at the well; and
- The *Nutrient Management Act* acknowledges that the risk from this activity is high by prohibiting it within 100 m of a municipal drinking water source.

In addition, as there are alternatives available to the property owner to ensure viable crop production via the application of commercial fertilizers, it is felt that this prohibition would be acceptable to property owners. Regional Municipality of Waterloo staff has undertaken measures to assess whether this activity is occurring and are not aware of its occurrence; however, there may be omissions in the Region's data. There are no enumerated existing significant threats in Intake Protection Zone 1. It is not possible for future threats to occur due to existing land uses and zoning constraints.

The approach to prohibiting new Non-Agricultural Source Material application in Wellhead Protection Area A is consistent with the Region's informal process when providing comments to the regulator on individual sites being considered for Non-Agricultural Source Material application. It is also part of the Region's tiered approach to risk reduction that has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue.

This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

The application, handling and storage of Commercial Fertilizer

In general, the Region's approach to risk mitigation is based on the principle of not increasing the risk by adding new threats and a tiered approach to risk reduction with more restrictive measures closer to the well. Accordingly, the risks posed by this threat warrant prohibition of this activity where it could be a future threat in areas closest to the wells within a Wellhead Protection Area A. A number of factors were considered, and were relied upon by the Source Protection Committee in determining that this threat warranted prohibition and could not be effectively managed to reduce the risk. These included the following:

- Delineation and scoring of the 100 m area around the well recognizes that inherent uncertainty exists in the subsurface soils, which precludes delineation of multiple vulnerability zones;
- In the event of a spill, there might not be sufficient time to respond as the storage facility is within 100 m of the well; and
- Chemicals associated with this threat have already affected the drinking water quality in the well and more restrictive risk-reduction measures are needed to reduce the risk.

Regional Municipality of Waterloo staff is not aware of the storage of fertilizer occurring in the Wellhead Protection Area A. It is not possible for future threats to occur due to existing land uses and zoning constraints.

The approach to prohibiting future threats is part of the Region's tiered approach to risk reduction that has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas with decreasing levels of restriction in other areas.

A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within all Wellhead Protection Areas where there is a drinking water issue. Chemical fertilizers do not contain pathogens so their use is less risky than agricultural source materials. The over application of fertilizers is less likely to occur than for agricultural source materials as there is a cost to the property owner for chemical purchase. In recognition of this, less restrictive policies are applied to activities in Wellhead Protection Area A and B and Intake Protection Zone 1 for existing and future activities. Risk management plans are an effective means to reduce the risk from existing and future activities involving the application, handling and storage of commercial fertilizer. Details related to the content of the risk management plan assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Most agricultural properties have utilized a variety of activities over the past and few activities will be considered to be a future threat.

Review of the Wellhead Protection Area extent and vulnerability has identified that management of the risk in areas where vulnerability is greater than or is equal to 6 is necessary for wells which have drinking water issues to reduce the impact of this threat at the drinking water intake. Detailed technical studies at K26 have indicated that soil nitrate testing is needed to ensure nutrient management plans achieve the desired risk reduction goals for nitrogen. An economic cost-benefit analysis was undertaken by the Regional Municipality of Waterloo and determined that this additional measure was appropriate and could be implemented at the least cost.

The application, handling and storage of Pesticides

The risks posed by this threat warrant prohibition of this activity where it is a future threat within Wellhead Protection Area A and Intake Protection Zone 1 so as not to increase the overall risk to the well. There are no enumerated existing significant threats in Intake Protection Zone 1. It is not possible for future threats to occur due to existing land uses and zoning constraints.

Outside of these areas, this policy approach utilizes the Risk Management Official's responsibilities within Wellhead Protection Areas A and B and E for existing activities and Wellhead Protection Area B and E for future handling and storage and application and in Intake Protection Zone 1 for existing application, handling and storage and future application. Risk management plans are an effective means to reduce the risk from existing and future activities. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. The Region's approach to new threats is based on the principle of not increasing the risk and a tiered approach to risk reduction that includes prohibition of new threats in high vulnerability areas.

The application, handling and storage of Road Salt

The Region's approach to risk reduction related to application of road salt recognizes that winter de-icing activities are required to keep roads, parking lots and sidewalks safe for public use. It also recognizes that there are increased risks closer to the well and with larger scale operations and that approaches to application will need to vary between public roads and parking lots as well as the size of the parking lot.

Based on program implementation experience in the Regional Municipality of Waterloo, application of salt to low density, single family residential properties is not considered a significant source of salt to municipal water supplies as these homeowners are not likely to hire contractors and their primary method for dealing with snow is to shovel their driveways. For those property owners that do, the primary emphasis would be on snow management and not salt application. In review of aerial photographs of the Well Head Protection Areas for wells with issues, it was determined that larger single family residences could have parking available for up to 6 cars. To provide an additional buffer, an area of less than 200 m² (or less than approximately 8 parking spots) was defined for small parking areas.

Medium parking lots are expected at properties used for multiple-residential and moderate-sized retail, commercial, and business facilities. Multiple-residential housing sites (condominium, town houses, apartments, etc.) are likely to contain parking areas for many users and thus require substantially greater parking areas. These facilities would be more likely to use contractors for winter operations and facilities would have boards/owners concerned about liability from inadequate salting related to multiple users. Medium sized parking lots are likely to be located adjacent to smaller sized business, smaller retail and commercial facilities that would likely not see the same volume of traffic as larger facilities. Based on a review of aerial photographs, and for ease of implementation, an area greater than 200 m² and less than 2000 m² (8 to 80 parking spots) was defined for medium parking areas.

Large parking lots are ones associated with substantive commercial, institutional and industrial facilities. These lots have heavy traffic use and are maintained by contractors that would need numerous trucks/equipment to provide winter salting services. Substantive deicing material would be needed to address the amount of vehicular and pedestrian traffic associated with these facilities. Large parking lots are defined as greater than 2000 m² (more than 80 parking spots)

The risks posed by this threat warrant prohibition of application on new roadways due to approval of development applications and new large parking lots within a Wellhead Protection Area A and medium and large parking lots within Intake Protection Zone 1 as well as handling and storage within the same areas and where a Chloride and/or Sodium issue has been identified so as not to increase the overall risk to the well. A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas.

A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems. There are no existing significant threats and it is not possible for future threats to occur due to existing land uses and zoning constraints.

Outside of these areas, the policy approach utilizes the Risk Management Official's responsibilities to manage the risk from this threat within other areas. The Regional Municipality of Waterloo has identified that it wishes to have greater control of application of salt on roadways and parking lots. Existing and future application of salt on roadways and on parking lots as well as the handling and storage of salt, pose a significant threat within a variety of Wellhead Protection Areas and where there is a drinking water issue related to Chloride and/or Sodium. Technical studies at several supply wells indicate that improved management practices over these areas are needed to reduce or stabilize salt levels in municipal wells over time. Specifically, where there is a drinking water issue, management of the risk in areas where

vulnerability is greater than 6 is necessary to reduce the impact of this threat at the drinking water source.

Risk management plans are an effective means to reduce the risk from existing and future activities involving the application, handling and storage of the threat. Details related to the content of the risk management plan assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. Implementing this for future threats is a cost-effective approach to reducing risk. Specifically, as roads are a linear feature that could transect the Wellhead Protection Area, the identification of vulnerable areas, tracking and reporting of application rates, and utilizing techniques to reduce the impact of salt application within the Wellhead Protection Area is necessary to managing the impact of this threat on drinking water supplies.

Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Costs to municipalities to implement risk reduction measures for existing activities will be incorporated into existing capital and operation budgets. Spill prevention and response is part of a property owner's due diligence under the *Environmental Protection Act*. The Region's approach to salt application includes approaching large and medium sized properties in a tiered approach to reduce the risk with more regulatory approaches used closest to the wells and for the larger parking lots as they pose greater risk.

The Region's approach to salt storage near wells with drinking water issues includes regulating properties that could store large and medium sized quantities in a tiered approach to reduce the risk with more restrictive approaches used closer to the wells and for the larger storage facilities as they pose greater risk.

Over 1000 properties were identified as having parking lots that were significant threats excluding those used only for residential purposes. For wells with chloride and sodium drinking water issues, these parking lots are distributed throughout the entire 25 year travel time. As different risk management measures and a tiered approach to source protection were used to guide policy development, the number of parking lots that might require risk management plans needed to be balanced with the significance of the threat and the scope of any implementation program. Thus parking lots were divided into small, medium and large sizes and different situations with different degrees of prohibition and management as identified above for the purpose of implementation.

The Storage of Snow

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Areas A and B and Intake Protection Zone 1. Accordingly, the risks posed by this threat warrant prohibition of snow storage where it is an existing or future threat within a Wellhead Protection Area A and B and within Wellhead Protection Areas with vulnerability greater than 6 for wells with a Nitrate, Sodium and/or Chloride Issue and in Intake Protection Zone 1. A number of factors were considered and were relied upon by the Source Protection Committee in determining that this threat warranted prohibition of existing facilities and could not be effectively managed to reduce the risk. These included the following:

- Research shows that snow removed from roadways and parking lots can have very high concentrations of sodium and chloride and can have elevated nitrogen concentrations;

- Snow storage is seasonal and temporal and therefore the method of reducing the quantity (i.e., disposal) is through melting which will result in infiltration of salt or nitrogen-laden water; and
- Due to the seasonal and temporal most property owners would not consider proper design and construction to limit impacts from infiltration into the subsurface or runoff.

Further, there are additional alternate storage approaches as the policies only prohibit the largest snow storage areas and do not limit the continuing operation of smaller sized storage areas or facilities. Regional Municipality of Waterloo staff are not aware of any existing large snow storage sites in the areas where prohibition of existing facilities applies. Existing land uses and zoning constraints regulate the establishment of a future activity.

Outside of these areas, this policy approach utilizes the Risk Management Official's responsibilities to manage the risk from this threat. Review of the Wellhead Protection Area and vulnerability has identified that management of the risk in areas where a Chloride, Sodium and/or Nitrate Issue has been identified in all contributing areas where vulnerability is greater than or is equal to 6 is necessary to reduce the impact of this threat at the drinking water intake. Risk management plans are an effective means to reduce the risk from existing and future activities involving the storage of snow. Details related to the content of the risk management plan assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. Implementing this for future threats is a cost-effective approach to reducing risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs.

External technical studies have identified that snow from other locations stored on a site can have elevated sodium and chloride concentrations substantially elevated compared to concentrations from de-icing activities at that property. The Region's approach to snow storage for wells with drinking water issues includes regulating properties that could store large and medium sized quantities in a tiered approach to reduce the risk with more restrictive approaches used closer to the wells and for the larger storage facilities as they pose greater risk.

The Region does not consider snow piled at the side of a road to meet the intent of the Table of Circumstances for snow storage. Further, Region staff do not intend to use snow storage policies for snow piles directly related to the adjacent parking lot. Rather snow storage in these circumstances will be addressed through salt application policies and Risk Management Plans.

The handling and storage of Fuel

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Areas A and B. Accordingly, the risks posed by the handling and storage of liquid fuel warrants prohibition in a number of circumstances. A number of factors were considered, and were relied upon by the Source Protection Committee in determining that existing circumstances of this threat warranted prohibition and could not be effectively managed to reduce the risk. These included the following:

- Delineation and scoring of the 100 m area around the well recognizes that inherent uncertainty exists in the subsurface soils, which precludes delineation of multiple vulnerability zones;
- In the event of a spill, the product is already below grade and as this would occur within 100 m of the well, it might not provide sufficient response time to prevent it from reaching the well;

- It is more difficult to monitor and detect leaks from below grade tanks compared to above grade tanks; the Ontario Drinking Water Standard for some of the chemicals in fuel are very low indicating that small quantities can have significant effects on drinking water systems; and
- Above grade storage alternatives are available.

Regional Municipality of Waterloo staff has undertaken measures to assess whether this activity is occurring and are not aware of any existing storage of liquid fuel within Wellhead Protection Area A; however, there may be omissions in the Regional Municipality of Waterloo's data. A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

Outside of these areas, this policy approach utilizes the Risk Management Official's responsibilities to manage the risk from this threat outside of these prohibited areas. Risk management plans are an effective means to reduce the risk from existing and future activities including handling and storage. Details related to the content of the risk management plan assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. Implementing this for future threats is a cost-effective approach to reducing risk. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Spill prevention and response is part of a property owner's due diligence under the *Environmental Protection Act*. This threat is also heavily regulated by Technical Standards and Safety Authority. In recognition of the above and that below grade tanks will be prohibited in the same area, less restrictive policies are applied in Wellhead Protection Area A and B.

The handling and storage of Dense Non-Aqueous Phase Liquids (DNAPLs)

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Areas A, B and C. The risks posed by this threat warrant prohibition of this threat where it is an existing threat in Wellhead Protection Area A or future threat in Wellhead Protection Area A and B and where there is a Trichloroethylene Issue so as not to increase the overall risk to the well. A number of factors were considered, and were relied upon by the Source Protection Committee in determining that this threat warranted prohibition and could not be effectively managed to reduce the risk. These included the following:

- Delineation and scoring of the 100 m area around the well recognizes that inherent uncertainty exists in the subsurface soils, which precludes delineation of multiple vulnerability zones;
- In the event of a spill, the chemicals can rapidly enter the subsurface and as this would occurred within 100 m of the well would not provide sufficient response time to mitigate the impact of the spill;
- Once in the ground, Dense Non-Aqueous Phase Liquids are very difficult if not impossible to mitigate; and
- The Ontario Drinking Water Standard for these chemicals is very low indicating that small quantities can have significant effects on drinking water systems.

Regional Municipality of Waterloo staff is not aware of the existing occurrence of this activity where it is to be prohibited.

A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas, including prohibition of most future threats. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

Outside of these areas, this policy approach utilizes the Risk Management Official's responsibilities to manage the risk from this threat outside of the prohibited areas. The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Areas B, C and D for this threat and where there is a Trichloroethylene Issue. Risk management plans are an effective means to reduce the risk. Details related to the content of the risk management plan assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Spill prevention and response is part of a property owner's due diligence under the *Environmental Protection Act*. The physical properties of this threat make it difficult to clean up once in the subsurface that warrants the use of this tool in vulnerable areas further away from the intake.

The handling and storage of Organic Solvents

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Areas A and B. The risks posed by this threat warrant prohibition of this threat in Wellhead Protection Area A where it is an existing and future threat, and in Wellhead Protection Area B where it is a future threat and where the storage and handling is below grade. A number of factors were considered, and were relied upon by the Source Protection Committee in determining that the existing activity warranted prohibition and could not be effectively managed to reduce the risk. These included the following:

- Delineation and scoring of the 100 m area around the well recognizes that inherent uncertainty exists in the subsurface soils, which precludes delineation of multiple vulnerability zones;
- In the event of a spill, the product is already below grade and as this would occur within 100 m of the well, it might not provide sufficient response time to prevent it from reaching the well;
- It is more difficult to monitor and detect leaks from below grade tanks compared to above ground tanks;
- The Ontario Drinking Water Standard for many organic solvents are very low indicating that small quantities can have significant effects on drinking water systems; and
- Above grade storage alternatives are available.

Regional Municipality of Waterloo staff is not aware of the existing occurrence of this activity where it is to be prohibited.

A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas. A tiered approach

helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

Outside of these areas, this policy approach utilizes the Risk Management Official's responsibilities to manage the risk from this threat. The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Areas A and B where the activity is not prohibited. Risk management plans are an effective means to reduce the risk in these locations. Details related to the content of the risk management plan assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Spill prevention and response is part of a property owner's due diligence under the *Environmental Protection Act*.

The management of runoff that contains chemicals used in the de-icing of Aircraft

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Area A and B and in Intake Protection Zone 1. The risks posed by this threat warrant prohibition of this threat where it is a future threat so as not to increase the overall risk to the well. There are no known existing significant threats in Intake Protection Zone 1 or Wellhead Protection Area A.

Outside of these areas, this policy approach utilizes the Risk Management Official's responsibilities to manage the risk from this threat. The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Area A and B where there is not a drinking water issue. For this threat, this approach acknowledges that the existing airport is anticipated to grow, that de-icing activities are likely to remain outside of areas where it can be significant, is governed by federal legislation and that the risks of de-icing can be managed through risk management plans.

The use of land as a livestock grazing and pasturing land and outdoor confinement area or farm animal yard

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Area A, and within Intake Protection Zone 1. The risks posed by this threat warrant prohibition of existing outdoor confinement areas and farm animal yards in Wellhead Protection Area A and future outdoor confinement areas or farm animal yards in Wellhead Protection Areas A, and future occurrences of this threat in Wellhead Protection Area A and B where there is a Nitrate Issue and in Intake Protection Zone 1. A number of factors were considered, and were relied upon by the Source Protection Committee in determining that the existing occurrence of outdoor confinement areas and farm animal yards warranted prohibition and could not be effectively managed to reduce the risk. These included the following:

- Delineation and scoring of the 100 m area around the well recognizes that inherent uncertainty exists in the subsurface soils, which precludes delineation of multiple vulnerability zones;
- Agricultural Source Material includes pathogens whereby one pathogen could result in immediate health impacts;
- Management of this threat cannot reduce numbers of pathogens to zero thereby eliminating the threat and potential adverse effects;

- Animal confinement and yards pose a high risk due to the concentration of animals in a small area that can result in large quantity of agricultural source material deposited in an uncontrolled manner;
- Animal movement in this confined area can remove and or disturb subsurface soil leading to increased vulnerability; and
- Chemicals associated with this threat have already affected the drinking water quality in the well and more restrictive risk-reduction measures are needed to reduce the risk.

Regional Municipality of Waterloo staff has undertaken measures to assess whether this activity is occurring and are not aware of any existing animal confinement or farm animal yards where its occurrence is to be prohibited. Further, there are no existing significant threats in Intake Protection Zone 1 and it is not possible for future threats to occur due to existing land uses and zoning constraints.

A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas, including prohibition of most future threats. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

Outside of these areas, this policy approach utilizes the Risk Management Official's responsibilities to manage the risk from these threats within Wellhead Protection Area A and B and Wellhead Protection Areas B, C and E where there is a Nitrate Issue. Review of the Wellhead Protection Area extent and vulnerability has identified that management of the risk in areas where vulnerability is greater than 6 is necessary to reduce the impact of this threat at the drinking water intake. Use of this tool recognizes that the *Nutrient Management Act* does not fully address these threats. Details related to the purpose or content of the tool assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Most agricultural properties have utilized a variety of activities over the past and few activities will be considered to be a future threat.

12.3.2 Prescribed Instruments

Waste Disposal Site and Storage Facilities

This policy approach relies on the existing responsibility of the Ministry of Environment to regulate waste handling and storage. The use of established provincial approval systems is supported by the Region's overall policy development principles and is a cost effective risk management tool. In addition, the Region's approach to risk mitigation is based on the principle of not increasing the risk by adding future threats.

Accordingly, for these threats, existing activities with current Environmental Compliance Approvals (ECA) will continue to be managed, but a review of the ECA will be required to ensure that they are adequately protective of groundwater sources. The details related to the content of the ECA assist the approval authority with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat, particularly in Issue Contributing Areas. Future activities requiring an ECA will not be approved through this process due to the nature and variability of this threat.

As part of their review, the Ministry of the Environment and Climate Change recommended that the Region add policies regarding management for the storage of polychlorinated biphenyls (PCB) waste threat sub-category to ensure all waste categories have been addressed within the policy.

Sewage System and Works - Septic System and Septic System Holding Tanks, Sewage Treatment Plant Effluent Discharges and Industrial Effluent Discharge

This policy approach relies on the existing responsibility of the Ministry of Environment to regulate large septic systems, sewage treatment plant effluent discharges, including lagoons and industrial effluent discharges. The use of established provincial approval systems is supported by the Region's overall policy development principles and is a cost effective risk management tool.

A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas, including prohibition of most future threats. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

Accordingly for these threats, existing activities with current Environmental Compliance Approvals (ECA) will continue to be managed, but a review of the ECA will be required to ensure that they are adequately protective of groundwater sources. In accordance with the Region's tiered approach, new activities within close proximity to the well and in an Issue Contributing Areas (ICA) with high vulnerability will not be approved through this process and new activities requiring an ECA in an ICA with low vulnerability will be managed. All future industrial effluent discharge will be managed through the ECA process.

The minimum content for the Environmental Compliance Approval reflects accepted industry standards to reduce the impact of the threat.

Sewage System and Works – Storage of Sewage

This policy approach relies on the existing responsibility of the Ministry of Environment to regulate storage of sewage, sewage treatment plant effluent discharges and industrial effluent discharges. The use of established provincial approval systems is supported by the Region's overall policy development principles and is a cost effective risk management tool. A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures for future threats. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems.

Accordingly for the storage of sewage, existing activities with current Environmental Compliance Approvals (ECA) will continue to be managed, but a review of the ECA will be required to ensure that they are adequately protective of groundwater sources. The tiered approach is utilized for future storage of sewage: In areas where there is no Issue, future below grade storage will not be permitted; whereas in an Issue Contributing Area (ICA) with a high vulnerability no new below or above ground storage will be permitted. However, future storage will be managed in an ICA with low vulnerability. The minimum content for the Environmental Compliance Approval reflects accepted industry standards to reduce the impact of the threat.

Sewage System and Works – Sanitary Sewers and Related Pipes

This policy approach relies on the existing responsibility of the Ministry of Environment to regulate sanitary sewers and related pipes. The use of established provincial approval systems is supported by the Region's overall policy development principles and is a cost effective risk management tool.

Existing and future sanitary sewers and related pipes, excluding new combined sewers, with current Environmental Compliance Approvals (ECA) will continue to be managed, but a review of the ECA will be required to ensure spill management practices are adequately protective of groundwater sources. New combined sewers will not be permitted through this process that is consistent with current industry practices.

Sewage System and Works – Discharge of Stormwater from a Stormwater Management Facility

This policy approach relies on the existing responsibility of the Ministry of Environment to regulate discharge of stormwater from a stormwater management facility. The use of established provincial approval systems is supported by the Region's overall policy development principles and is a cost effective risk management tool. A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo that utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas, including prohibition of most future threats.

Accordingly, existing stormwater management facilities with current Environmental Compliance Approvals (ECA) will continue to be managed, but a review of the ECA in consultation with the municipality and subject to the findings of municipality's assessment will be required to ensure that they are adequately protective of groundwater sources. Development of new stormwater management facility close to the supply well increases the overall risk, which the Regional Municipality of Waterloo wishes to avoid; therefore new stormwater management facilities will not be permitted through this process within Wellhead Protection Area A. Stormwater management facilities are necessary for new development and therefore will be permitted with an approved ECA farther from the well.

The application and storage of Agricultural Source Material to land

This policy approach relies on the existing responsibility of the Ministry of Agriculture, Food and Rural Affairs to manage application of nutrients on farm properties. This approach is supported by the Region's overall principles used to develop source protection policies. A cost effective risk management tool is to use established provincial approval systems when future activities will require issuing a prescribed instrument and to review and amend existing prescribed instruments. Details related to the conditions of approval assist the ministry with understanding the minimum risk reduction measures needed to manage the risk. The minimum content reflects accepted industry standards to reduce the impact of the threat. Costs to property owners to implement risk reduction measures for existing activities will be partly offset through incentive programs. Most agricultural properties have utilized a variety of activities over the past and few activities will be considered to be a future threat.

The application and storage of Non- Agricultural Source Material to land

This policy approach relies on the existing responsibility of the Ministry of Agriculture, Food and Rural Affairs to manage application and storage of nutrients on farm properties and the Ministry of Environment regarding other lands. This approach is supported by the Region's overall principles used to develop source protection policies. A cost effective risk management tool is to use established provincial approval systems when activities will require issuing a prescribed instrument and to review and amend existing prescribed instruments. The policy approaches address Environmental Compliance Approvals that were issued by the Ministry of Environment

prior to January 2011 and that would not otherwise be administered by the Ministry of Agriculture, Food and Rural Affairs until after 2016. It also directs the Ministry of Environment to revise Environmental Compliance Approvals where application is on non-farm land. There are no existing significant threats in Intake Protection Zone 1 and it is not possible for future threats to occur due to existing land uses and zoning constraints.

The handling and storage of fuel

The policy approach relies on the existing responsibility of the Ministry of Natural Resources and the use of prescribed instruments within the *Aggregated Resources Act* to address this threat within an aggregate operation. A cost effective risk management tool is to use established provincial approval systems when activities will require issuing a prescribed instrument and to review and amend existing and future prescribed instruments.

Conditions

This policy approach relies on the existing responsibility of the Ministry of Environment to regulate waste handling and storage. The use of established provincial approval systems is supported by the Region's overall policy development principles and is a cost effective risk management tool. The risks posed by this threat warrant a review of all existing and new relevant prescribed instruments that govern the Condition site to ensure that they are being managed and remediated in a way that reduces their impact on drinking water sources. This review recognizes that some prescribed instruments focus only on the treatment discharges or mobile treatment systems and reducing the risk through these instruments may not be feasible. Through the review process, the Region and the Ministry of Environment and Climate Change have refined the wording for this policy to ensure that updates on the actions taken by the instrument holder are reported to the Region on an annual basis and that any new or revised Prescribed Instrument is provided to the Region. These policies will assist in the Region in obtaining additional information on these sites.

12.3.3 Land Use Planning

Sewage System or Works - Septic Systems

This policy utilizes existing *Planning Act* authorities to prohibit or manage the future risk from this threat as part of the development approval process. The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats. A tiered approach is used which prohibits the activity close to the well and more permissive policies for high vulnerability areas at greater distances. The risks posed by this threat warrant prohibition of future occurrences of this threat in Wellhead Protection Area A and, Wellhead Protection Area B where the wells are either groundwater under the influence of surface water (GUDI) in Wellhead Protection Area B or where there is a drinking water issue for nitrogen so as not to increase the overall risk to the well or intake.

Technically, septic systems are designed to discharge pathogens and nutrients to the subsurface and are typically constructed in the shallow subsoil. In addition, since drinking water in Regional Municipality of Waterloo typically includes water softening, process wastewater will be discharged to septic systems. Further, GUDI wells obtain some portion of their water supply from shallow aquifers where septic systems may be constructed. Finally, in well K23, nitrogen mass loading calculations indicate that septic systems could contribute the majority of the loading to the supply well. In these situations, prohibiting the creation of new lots that rely on septic systems where there is already a drinking water Issue represents good land use planning.

In areas further from the well, management of the risk in other vulnerable areas is necessary to reduce the impact of this threat at the drinking water intake. Accordingly a study to assess the impact is required to manage the risk. The scope of this study is similar to what Regional Municipality of Waterloo already requests as part of development applications that include this threat. Implementation guidelines referred to in the policies may not currently exist. Where they do not exist, they will be developed and undergo further public consultation.

Sewage System or Works – Discharge from a Stormwater Management Facility

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Area A and in Intake Protection Zone 1. The risks posed by this use warrant prohibition of this threat where it would be a future threat so as not to increase the overall risk to the well. Prohibition of this use adjacent to supply wells is good land use planning.

Within Wellhead Protection Areas B and E, Intake Protection Zone 3, and in all protection areas where there is a Chloride, and/or Nitrate Issue, the risks posed by this activity necessitate further study be undertaken as part of the Planning Act application process, so as not to increase the overall risk to the well and/or reduce the impact of this threat at the drinking water intake. Stormwater management facility can be designed to directly infiltrate surface water runoff that may contain a variety of chemicals from the related catchments. Design of these facilities is integral with new development planning approval. Requiring an assessment of the impact to and recommendations for design measures in system construction to minimize the impact to drinking water systems, to the satisfaction of the Region, represents good land use planning. Implementation guidelines referred to in the policies may not currently exist. Where they do not exist, they will be developed and undergo public consultation consistent with the *Planning Act*.

Additional consideration on the potential impact to the drinking water source is required where wells are constructed in bedrock aquifers as the occurrence of surface water within 500 m could change the classification of the water supply system under the *Safe Drinking Water Act* and/or could affect the degree of treatment required for the intake.

Road Salt

This policy utilizes existing *Planning Act* authorities to manage the future risk from this activity as part of the development approval process. Development applications proposing new roads within less vulnerable areas are to be supported by a study assessing salt impact to the satisfaction of the Regional Municipality of Waterloo in Wellhead Protection Area B and where there is a Chloride and/or Sodium issue in Wellhead Protection Area B, C, D, E. Implementation guidelines referred to in the policies may not currently exist. Where they do not currently exist, they will be developed and undergo further public consultation.

Handling and Storage of Fuel

This policy utilizes existing *Planning Act* authority to manage the future risk from this activity as part of the development approval process. The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Area A and B. The risks posed by this activity warrant prohibition of future land uses associated with this threat so as not to increase the overall risk to the well. As this land use is explicitly linked to the activity and there is greater risk of impact to the well arising from spills due to the large quantities of materials stored, prohibition in highly vulnerable areas close to the well is good land use planning. The Regional Official Plan already prohibits these uses in Wellhead Protection Areas.

Conditions

This policy utilizes existing *Planning Act* authorities to ensure the use of an environmental screening process as a component of a complete application to decrease the opportunity for contamination to leave the site and ultimately to remove the property from the list of significant condition sites.

12.3.4 Education and Outreach

Waste Disposal Site

Sewage System or Works -Septic System and Septic System Holding Tanks,

The Application, Handling and Storage of Agricultural Source Material,

The Application, Handling and Storage of Commercial Fertilizer,

The Application, Handling and Storage of Salt,

The Storage of Snow,

The handling and storage of Dense Non-Aqueous Phase Liquids (DNAPLs) and

The use of land as a livestock grazing and pasturing land and outdoor confinement area or farm animal yard

These policies utilize education and awareness to encourage the use of best management practices and to assist in raising awareness regarding the importance of source water protection. A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas. In areas further from the wells, incentives and/or education programs are utilized. Review of the Wellhead Protection Area extent and vulnerability in conjunction with the tiered approach has identified that education and awareness are a cost effective approach at greater distance from the well. They will be applied in Wellhead Protection Areas where the vulnerability is less than 6 for well fields where there is a drinking water issue, and where appropriate, in Intake Protection Zone 3 to assist in reducing the risk to the City of Brantford's surface water intake. Education and awareness programs assist in reducing the risk from existing threats and will be paired with incentive programs to achieve risk reduction. Details related to the purpose or content of the tool assist the implementing authority with understanding the minimum program content needed to manage the risk. Education assists property owners with understanding the importance of implementing beneficial practices to protect drinking water.

Based on further comments from the Ministry of Environment and Climate Change, additional policy direction in RW-CW--5 has been added regarding the following waste threat sub-categories, provided an ECA is not required:

- storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste; or
- storage of hazardous or liquid industrial waste,

This policy was introduced based on further detail regarding the nature of these threats that was provided by the Ministry of the Environment and Climate Change. Given that there are a considerable number of industrial, commercial and institutionally zoned properties located within the Region, it was determined that prohibition of such waste threats where an ECA is not required may have the unintentional consequence of constraining or prohibiting many planned land uses that only generate fairly small quantities of such wastes. The Ministry of Environment and Climate Change appropriately regulate these waste activities.

Waste Disposal Site – Application of Untreated Septage to Land

These policies utilize education and awareness to encourage water quality improvements. A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas. In areas further from the wells, incentives and/or education programs are utilized. Review of the Wellhead Protection Area extent and vulnerability in conjunction with the tiered approach has identified that education and awareness are a cost effective approach at greater distance from the well. They will be applied in Wellhead Protection Areas where the vulnerability is less than 6 for well fields where there is a drinking water issue. Education and awareness programs reduce the risk from existing threats and will be paired with incentive programs to achieve risk reduction. Details related to the purpose or content of the tool assist the implementing authority with understanding the minimum program content needed to manage the risk. Education assists property owners with understanding the importance of implementing beneficial practices to protect drinking water. In the opinion of the source protection committee these policies, if implemented, will promote the achievement of the objectives of the plan in accordance with paragraph 2 of subsection 22(2) of the *Act* and a policy to regulate or prohibit the activity is not necessary to achieve those objectives.

The application, handling and storage of Road Salt

This policy utilizes education and awareness to encourage best management practices that form the core of the Smart About Salt program to reduce the impact of winter de-icing activities. Education and awareness programs reduce the risk from existing threats and will provide important social marketing support to incent behaviour change and are an effective approach at greater distance from the well. Details related to the purpose or content of the tool assist the implementing authority with understanding the minimum program content needed to manage the risk.

The approach for these policies is part of a tiered approach to risk reduction that has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue to reduce the risk from winter de-icing activities. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas as well as focuses mitigation on activities for de-icing roads, large parking lots and medium sized parking lots which receive considerably greater salting levels compared to small parking lots. A tiered approach helps reduce agency implementation costs and is a research-supported approach to reducing impacts to drinking water systems. In most cases, education will be utilized with other tools to achieve risk reduction. Education assists property owners with understanding the importance of implementing beneficial practices to protect drinking water and providing additional education to property owners will reduce the risk to source water.

This tool has been identified as the primary risk-reduction measure for small salt storage facilities in vulnerable areas greater than and equal to 6 and for small parking lots in all vulnerable areas. The risk posed by these smaller structures and application on these smaller lots is less than for larger facilities or lots. In the opinion of the source protection committee these policies, if implemented, will promote the achievement of the objectives of the plan in accordance with paragraph 2 of subsection 22(2) of the *Act* and a policy to regulate or prohibit the activity is not necessary to achieve those objectives.

The handling and storage of Fuel

This policy utilizes education and awareness to encourage best management practices. Education and awareness programs reduce the risk from existing threats. There is considerable existing legislation covering this activity. Existing legislation requires an inspection of small fuel

oil tanks systems every 10 years by certified contractors and has additional provisions requiring fuel supply companies to monitor tank conditions. Providing additional education to home and property owners of their obligations will assist in ensuring these systems are adequately maintained to reduce the risk to source water.

For small fuel oil tanks typical of a home oil heating system, the preferred tool is incentive programs and education and outreach to ensure the appropriate maintenance of the tank and response in case of a spill. In the opinion of the source protection committee this policy, if implemented, will promote the achievement of the objectives of the plan in accordance with paragraph 2 of subsection 22(2) of the *Act* and a policy to regulate or prohibit the activity is not necessary to achieve those objectives.

The Use of Land as a Livestock Grazing and Pasturing of Land

These policies utilize education and awareness to encourage best management practices. A tiered approach to risk reduction has been developed by the Regional Municipality of Waterloo for well fields with a drinking water issue. This approach utilizes more restrictive risk management measures close to the well and in the higher vulnerable areas. In areas further from the wells, incentives and/or education programs are utilized. Review of the Wellhead Protection Area extent and vulnerability in conjunction with the tiered approach has identified that education and awareness are a cost effective approach at greater distance from the well.

For livestock grazing and pasturing of land within a Wellhead Protection Area B with a vulnerability equal to 10, education and outreach was determined to be an adequate to address the risks associated with this activity. In the opinion of the source protection committee this policy, if implemented, will promote the achievement of the objectives of the plan in accordance with paragraph 2 of subsection 22(2) of the *Act* and a policy to regulate or prohibit the activity is not necessary to achieve those objectives.

12.3.5 Incentive Programs

Sewage System or Works -Septic System and Septic System Holding Tanks, The Application Handling and Storage of Agricultural Source Material, The application, handling and storage of Commercial Fertilizer, The Application, Handling and Storage of Road Salt, The application, handling and storage of Pesticides, The handling and storage of Fuel, The handling and storage of Dense Non-Aqueous Phase Liquids (DNAPLs) and The use of land as a livestock grazing and pasturing land and outdoor confinement area or farm animal yard

This policy utilizes incentives to encourage the implementation of best management practices. Incentives assist property owners with the cost of implementing beneficial practices to protect drinking water and *Clean Water Act* policies related to existing threats. Incentives will be utilized with other tools to achieve risk reduction.

Conditions

This policy utilizes incentives, to facilitate the investigation and development of plans to prevent off-site movement of contaminants to assist in the protection of sources of drinking water.

12.3.6 Specify Action

Specified Action is used where no other prescribed instrument, legislation, or *Clean Water Act* tool are available to municipalities to manage the threat, where the action will compliment other threat policies, and / or where the policy is a Strategic Action.

Sewage System or Works – Septic System or Holding Tank

Septic systems are designed to discharge nutrients and pathogens to the subsurface. A properly functioning septic system will reduce the likelihood that the drinking water treatment and disinfection systems will become overloaded. The Regional Municipality of Waterloo has identified the implementation of the mandatory maintenance inspection program as the primary tool to address this threat. This program supports the management of this threat by providing a consistent approach for determining if small septic systems are functioning as designed and to ensure compliance with the Ontario Building Code.

Sewage System or Works – Sanitary Sewers and Related Pipes

Sanitary sewers and related pipes including pumping stations can leak wastewater into the subsurface and on occasion spills occur at pump stations. As wastewater is a source of nitrogen and to be consistent with clauses in prescribed instrument policies, in all Issue Contributing Areas where the vulnerability is less than 6 where there is a Nitrate Issue. The Regional Municipality of Waterloo has identified the need for contingency plans to be prepared by the Area Municipalities to respond to spills in a consistent and timely manner in these areas.

Sewage System or Sewage Works- Discharge of Stormwater from a Stormwater Management Facility

To assist in the review and amending of Environmental Compliance Approvals by the Ministry of Environment required by other policies within the Plan, the Area Municipalities are directed to prioritize and undertake an assessment of the stormwater management facilities to determine the scope and type of measure to protect drinking water sources. This policy provides the benefit of the experience of the Area Municipalities in managing these facilities to have current information on hand to assist in the Ministry of Environment review process.

The Application, Handling and Storage of Road Salt

The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats. These policies take advantage of the Environmental Assessment process to include additional design considerations to reduce the impact of additional salt loading from modified roads on source water. The design alternatives include the use of impermeable shoulders to direct snow melt back onto the road, use of living snow fences to reduce drifting and adequate ditch sizing in the design. Including these requirements in the assessment stage of building new roads is a cost effective approach to reducing the impact from new threats. These policies also require an update to the salt management plans for the Ministry of Transportation to incorporate best management practices as well as Smart about Salt accreditation for municipal facilities and large and medium sized parking lots.

Storage of Snow

This policy requests development of a provincial approval process for this threat that would follow existing provincial guidance (B-4 Guideline) to implement best management practices to minimize the impact of surface and sub-surface drainage for any new storage of snow.

The Conveyance of Oil by way of Underground Pipeline

The existing regulatory framework regarding pipeline construction is extensive. If a new pipeline is construction, the policy approach directs that there be appropriate requirements for design, maintenance and inspection of the pipeline within a vulnerable area as well as ensures that any new pipeline is constructed in a manner or location that would manage the risk to drinking water sources. The policy relies on the existing regulatory framework.

Conditions

The existing regulatory framework for conditions provides the Ministry of Environment with authority to address Significant Conditions. Policies have been included to set out the requirement for specific information sharing process including the scope of information to be shared and meeting timelines. By incorporating specific language into the source protection plan, a framework for building upon current practices has been established, a primary objective of the Region. These efforts will be augmented by the prioritization of any abatement activities by the Ministry in areas with the greatest potential risk to drinking water sources.

12.3.7 Strategic Action

Spill Prevention Plans, Spill Contingency Plans and Emergency Response Plans along highways, railway lines or shipping lanes

The Regional Municipality of Waterloo and Area Municipalities are requested to update their spill contingency plans or emergency response plans for the purpose of protecting existing drinking water sources along highways and/or railway lines are updated and that the most current information is available to the Spills Action Centre in the case of a spill.

Transport Pathways

Constructed pathways may facilitate the movement of contaminants vertically and laterally below the ground and result in faster or more widespread distribution. A number of policies are included to manage the increased risks to drinking water sources from threats located near transport pathways and to increase communication regarding the creation of new transport pathways.

These policies also utilize existing *Planning Act* authorities to manage, as part of the development approval process, the future risk resulting from the creation of transport pathways. The Regional Municipality of Waterloo has identified that it wishes to have greater control of activities that pose significant threats within Wellhead Protection Area A and B with a vulnerability of ten(10) where there is not a drinking water issue. Land-use planning documents should require an assessment of the degree to which transport pathways may be established and identify mitigation measures to protect drinking water sources.

Area Municipalities are requested to circulate site plan applications to the Regional Municipality of Waterloo within vulnerable areas that could result in the development of a transport pathway to provide an opportunity to assess the impact and comment on potential mitigation measures.

12.4 Summary of Comments Received During Pre-consultation and How They Have Been Considered

In accordance with Ontario Regulation 287/07 made under the Ontario Clean Water Act, 2006, the Regional Municipality of Waterloo on behalf of the Source Protection Committee completed pre-consultation for the development of the Grand River Source Protection Plan with the various implementing bodies affected by the plan.

Each draft policy was circulated to the affected agency for review and comment. This pre-consultation process began on April 12, 2012. Each agency was provided a package that included each draft policy, the rationale behind the policy and maps that identified the areas to which the policy applied. In addition, the package also provided two summary tables: policies by agency and policies by threat and tool.

Agencies were given to June 15, 2012 to provide comments to the Regional Municipality of Waterloo. The last set of comments was received on August 13, 2012.

The financial implications, and the question about what agency would ultimately be responsible for funding source water protection implementation in the City of Brantford was strongly considered in the development of the source protection policies.

The City has tried to limit the use of Part IV Risk Management Plans where ever possible in an effort to reduce costs. However, in some instances the Part IV Risk Management Plan is the best option to address significant drinking water threats. This was implemented where after a review of the existing and project future land uses, and it was noted that there was a high likelihood of the activity occurring. The additional cost to put a Risk Management Official (RMO) in place to the City is unknown at this time. There may be opportunity to share an RMO with the County of Brant for example however, the costs to arrange such an option again cannot be determined at this time. Finally, it is unclear if the Province will make funds available to assist municipalities in the establishment of an RMO as part of the source water protection process.

Finally, the financial implications on other agencies have also been considered in the development of the policies. The majority of policies included in this Plan are requesting implementing bodies to prioritize the Intake Protection Zones (IPZs) in their approval process, deny the approvals, and provide for measures that would address concerns within the IPZs, or enhance existing programs and services to have regard to significant threat policies and source protection. In many cases, it is believed that these policies should have no financial implications for the implementing body other than those already assumed within their own internal processes.

Therefore, in the absence of any clear indication from the Province of Ontario as to the level of its financial commitment for the implementation of source water protection, the goal of the source protection policies was to, whenever possible, protect the municipal drinking water supply with an as low as possible expense to the implementing body.

17.3 Policy Intent and Rationale

The Source Protection Plan policies apply within the City of Brantford city limits, where vulnerable areas were identified in the approved Assessment Report. As such, the majority of the land is residential, commercial and industrial, therefore, the policies were written to reflect this land use. It is anticipated in that this land use will change minimally in the future where the policies will apply. The mapping reflected in the Source Protection Plan should be referenced when reviewing this rationale.

17.3.1 Part IV Policies

Section 57 Prohibition

Intent:

These policies are intended to prohibit activities under Section 57 of the *Clean Water Act, 2006* in vulnerable areas where the activities would be a significant drinking water threat. The Holmedale Canal, which is located in IPZ-1 conveys raw water from the Grand River to the Water treatment plant's intake. The Canal is characterized by a low dilution capacity and as such contaminant intrusion will have the most significant impact on raw water quality. As a result, policies are significantly more stringent in IPZ-1 compare to IPZ-2 or IPZ-3.

Rationale:

Based on a review of current and projected land uses in the areas where the following activities could be a significant drinking water threat, it is believed that in most cases, these activities are unlikely to occur in the future in the City.

Waste activities that do not require an Environmental Compliance Approval

For new activities which do not require an Environmental Compliance Approval, the uses of Part IV Prohibition within the Intake Protection Zones ensure that where such activities would be significant drinking water threats, never become significant drinking water threats. The risks presented by these types of facilities warrant prohibition of future occurrences as these are the most vulnerable areas. This type of activity would include among other, the storage or discharge of mine tailings and the land disposal of industrial wastes.

Future waste generation activities carried out in IPZ-1 that don't require a PI but that would pose a SDWT will be prohibited. Only small waste generators are exempt as described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste as per On. Regulation 347.

~~Given existing land uses in the City, it is unlikely these activities will occur within these applicable areas and therefore, the impact of prohibiting these activities is negligible. This policy is consistent with the prohibition of approval of activities within the Environmental Compliance approval process.~~

The storage of Agricultural Source Material (ASM) and pesticides

The risks presented by the future storage of ASM and pesticides warrants prohibition of future occurrences. The *Nutrient Management Act* currently does not provide any guidance for Intake Protection Zones, however, guidance from OMAFRA has stated that WHPA-A is similar in vulnerability to IPZ-1, there the same principals can apply. Therefore, this policy is consistent with the direction of the *Nutrient Management Act*. The municipal intake is located within urban areas and therefore, the potential impact of this policy on the agricultural community and other land uses is negligible.

The application, storage or handling of Commercial Fertilizers

The future application, or handling and storage of commercial fertilizers in IPZ-1 will be prohibited in order to reduce the likelihood of contaminant intrusion in the Holmedale Canal. However, this policy will not apply until either the percent managed land and/or the livestock density increases over current values as detailed in the Assessment Report.

The handling and storage of DNAPL and Organic Solvent

For the same reasons presented above, the future handling and storage of DNAPL or organic solvent will be prohibited to limit contaminant intrusion in the Holmedale Canal.

Section 58 Risk Management Plans

Intent:

The development of Part IV Risk Management Plans under Section 58 of the *Clean Water Act*, 2006 was required for activities that cannot be managed effectively through land use planning or existing Prescribed Instruments.

Rationale:

Part IV Risk Management Plans, completed with the Risk Management Official, under Section 58 of the *Clean Water Act*, and are used as a tool to manage existing and future drinking water threats. This tool is used to “fill the gap” where land use policy or other existing legislation could not regulate a significant drinking water threat. This tool is particularly effective in dealing with existing significant drinking water threat activities, where prohibition would likely impose undue hardship on property owners, businesses, etc. Part IV Risk Management Plans also provide an opportunity to work with property owners/proponents to manage a threat, particularly in areas that are less vulnerable (i.e. IPZ- 2, 3).

Waste activities that do not require an Environmental Compliance Approval

This policy ensures that new activities which do not require an Environmental Compliance Approval are adequately managed to ensure they do not become a significant drinking water threat. Examples include auto-salvaging facilities and hardware stores that collect hazardous waste for disposal.

IPZ-2 and IPZ-3 are protected areas located upstream of the Holmedale Canal on the Grand River. Pollutant intrusion will have a lesser impact compare to the Holmedale Canal due to a stark increase in dilution factor. As such, new small and large waste generators, which don't require a PI but which pose a significant drinking water threat will be permitted as long as they are managed through an E&O program and/or an RMP.

To ensure that existing activities in IPZ-1, 2 and 3 that are significant drinking water threats, cease to be significant drinking water threats, the City has determined that a Part IV Risk Management Plan would be the most effective tool to minimize the risk.

Although these policies would result in costs to the implementing body, the use of Part IV Risk Management Plans to manage existing storage of waste was also the best option to manage these existing threats, particularly since these activities do not have an Environmental Compliance Approval and the relatively few circumstances where this policy would apply.

The application, handling and storage of Agricultural Source Material (ASM)

For agricultural operations that do not have or do not require a Nutrient Management Plan under the *Nutrient Management Act*, a Part IV Risk Management Plan was felt to be an effective means to regulate the application and storage of ASM. Existing agricultural operations where this policy would apply are less than 300 Nutrient Units. New livestock operations not requiring a Nutrient Management Plan/Strategy would be less than five (5) Nutrient Units. It is anticipated that the number of livestock operations falling within these circumstances would be nominal and this approach was therefore deemed appropriate. Furthermore, the Part IV Risk Management Plan would be similar in nature to a Nutrient Management Plan/Strategy and therefore would be a tool that the agricultural community is familiar with. This policy approach is supported by OMFARA. However, the future storage of agricultural source material in IPZ-1 that doesn't require a *Nutrient Management Plan* will be prohibited to minimize eutrophication of source water.

The application, handling, and storage of commercial fertilizer

The City has determined a Part IV Risk Management Plan would be the most effective tool to manage this activity based on a review of the current and projected land uses. However, future use of commercial fertilizers in IPZ-1 will be prohibited because of the Holmedale Canal's low dilution factor.

The application, handling and storage of pesticides to land