

MEETING MINUTES



MEETING City of Guelph Organic Waste Processing Facility Public Liaison Committee Meeting #12

DATE Tuesday February 11, 2014

LOCATION Administration Boardroom, Waste Resource Innovation Centre 110 Dunlop Drive, Guelph, Ontario

TIME 6:30 p.m. to 8.10 p.m.

PRESENT Committee Members: Elected Chair, Michael Fortin, (City of Guelph resident) Karyn Hogan, (City of Guelph resident) Donna Sunter, (City of Guelph resident), Laura Marini (City of Guelph resident), Tim Fisher, (City of Guelph resident), Larry Conrad, (City of Guelph resident)

MOE: Kevin Noll

Wellington Organix: Mark Jared

City of Guelph: Catherine McCausland, David Gordon

Scottera Consulting: Richard Pellerin

REGRETS ABSENT Ken Spira, (City of Guelph resident),

DISCUSSION ITEMS

ITEM #	DESCRIPTION
1	Disclosure of Pecuniary Interest: No disclosures of Pecuniary Interest.
2	Approval of Agenda Agenda was approved and accepted by the committee.
3	Approval of October 30th 2013 minutes Accepted by the committee.

4	<p>Review of Action Items from Previous Meeting:</p> <p>Item 1- Mike did have chance to review the email from email, he thinks they have been looking at two separate sets of figures, one based on the budget figures and one based on the FIR return.</p> <p>Item 2- The interior lighting in the building is on for safety reasons. At this current time the city will not be turning them off.</p>
5	<p>Delegations wishing to be heard regarding matters on the agenda:</p> <p>None</p>
6	<p>Matters arising from the Delegations:</p> <p>None</p>
7	<p>New Business:</p> <p>a) Organics Facility update on operations.</p> <p>From Monday 28th October 2013 until Friday the 7th February 2014 the plant has processed 5456.56 tonnes of Source Separated organics.</p> <p>The facility has shipped out 1260.01 tonnes of finished compost in this time.</p> <p>The amount of screening waste leaving the facility in this time frame is as follows:</p> <p>Screening waste- plastics bin- 135.21 tonnes</p> <p>Screening waste as a percentage of incoming source separated organics is 2.48%.</p> <p>Facility has been running taking waste from the City of Guelph and the Region of Waterloo in this 3 month timeframe.</p> <p>b) Overview of odour complaints since October 30th 2013 meeting</p> <p>There has been 1 odour complaint since the last plc meeting. It was investigated by the City and the MOE and was not attributed to the facility</p>
8	<p>Status of current amendments (PDO and negative air pressure):</p> <p>Negative air pressure- The MOE has given the City 9 months to collect some more data. This time frame elapsed on the 31st January 2013. The City will be submitted information this week.</p> <p>PDO- The project is still ongoing, and is covered by the next item on the agenda.</p>

<p>9</p>	<p>Scottera Consulting to provide overview and respond to questions about the new PDO:</p> <p>The questions submitted by Ken Spira on the 24th January 2014 and the answers provided to those initial questions by the City of Guelph will be attached to these minutes.</p> <p>Richard Pellerin went through the design for the storm water containment system for the new public drop off area.</p> <p>This was broken down into broadly 3 areas of discussion. The top section where the vehicles would pull in and unload. The lower section where the roll off containers are located and the berm that will surround the new area.</p> <p>There was discussion around how the filtration system will work for the top section</p> <p>The main concern of the residents on the plc was that the system around the lower bin area was not going to sanitary sewer all of the time and there was potential contamination of ground water.</p> <p>The City has agreed to look at 2 options for this area, getting seals for the bins that will be in that area, and isolating the runoff from the bin area and re directing it.</p> <p>There was discussion around the height of the berm and the materials that would be used in its construction.</p> <p>The submission will be going into the MOE for review and there will be further discussion at the next meeting.</p> <p>The City had changed some of the initial design based on comments from the questions submitted from ken Spira.</p> <p>Mike Fortin, asked if the supplementary questions from Ken Spira on the 10th February could be re submitted by Ken and the City agreed to answer them in writing.</p>
<p>10</p>	<p>Other business</p> <p>No other business</p>
<p>11</p>	<p>Next meeting date's</p> <p>Confirmed as Thursday May 8th ,2014</p> <p>This is a date change due to Easter week</p>
<p>12</p>	<p>Adjournment</p> <p>Accepted by the committee.</p> <p>Meeting adjourned at 8.10 p.m.</p>

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ACTION ITEMS

ITEM #	ASSIGNED TO	DUE DATE	DESCRIPTION
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1	The City of Guelph	Next meeting	To provide information about the lower section for the storm water management system
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Responses to Ken Spira's Questions regarding the Storm Water Management Plan submitted in support of the application to amend the Sewage Works Approval

Page one of the draft issued for review 1.0 says that Sco-Terra Consulting group Limited has been retained by the City of Guelph Solid Waste Resources Division. Was there a pre-qualification process put in place to determine the ability of the consultants to design a storm water management plan that requires special attention and expertise to protect the aquifer below the site and buffering of the proposed drop of area from the residential community to the south?

Bullet 1: As identified in various City Reports, the majority of the City is vulnerable to aquifer recharge. The Stormwater Management Master Plan provides the following guidance:

"Low Impact Development is the use of source and conveyance stormwater management controls to promote infiltration and pollutant removal on a local site by site basis. These measures rely on eliminating the direct connection between impervious surfaces such as roofs, roads, parking areas, and the storm drainage system, as well as the promotion of infiltration on each development or redevelopment site."

"The City of Guelph has an interest in implementing LID practices not only within new development, but within existing neighbourhoods. For new development, the City of Guelph will be incorporating LID requirements and guidelines as part of an updated Stormwater Management Policy."

"The decision to infiltrate groundwater will depend on the expected contaminant potential within the infiltrating water and the degree of contaminant susceptibility to the local aquifers."

It should be noted that the PDO site will generate run-off from paved surfaces, which are expected to function similar to that of an equivalent size parking lot. As identified in the draft SWM Plan (Report), there is no proposed storage of solid waste within the publically accessible PDO area. Short-term storage of yard waste and brush is proposed at the south limit of the PDO. The frequent removal of this waste, as is required under the current ECA, and which requirement is met and exceeded by the City (i.e. removal occurs more frequently than required by ECA during high usage periods), serves to limit impact to stormwater runoff quality.

As referenced in MOE SWM Guidelines, parking lots are expected to generate run off with elevated levels of sediment, metals as well as sodium and chloride generated from winter salting activities. MOE SWM planning and design guidelines outline alternative stormwater management facilities which offer water quality treatment function. The Oil and Grit Separators are proposed as an at-source treatment provision, prior to conveyance to the infiltration basins for additional 'soft' treatment measures and infiltration. This approach has been reviewed with the Ministry through pre-consultation.

In terms of qualifications, Mr. Pellerin has 25 years of experience in the Consulting Engineering Industry in Ontario, including development of Stormwater Management Plans and Remedial Plans for both open and closed Landfill Sites and Community Scale Development projects. Mr. Pellerin has provided evidence before the Ontario Municipal Board, the Ontario Superior Court of Justice and the Minister of the Environment in relation to Municipal Class EA, Municipal Infrastructure and Wastewater Servicing Projects.

The Stormwater Management Plan developed for the new PDO, together with value-added stormwater management recommendations in relation to the Transfer Station Site, have been reviewed with the MOE Guelph District, West Central Region

and EAAB. The PDO-TS SWM Plan remains subject to issuance of an ECA by the Ministry under section 53 of the Ontario Water Resources Act.

Is a Storm Water Contamination Assessment being done and if not why?

Bullet 2: The Stormwater Contamination Assessment is considered unnecessary due to the proposed operation of the PDO site – refer to response under Bullet 1 above.

Was the design contract tendered and if it was, why was the tender not publicised on the City website with the results? If not, why was this consultant chosen, how much is their fee and why was the same consultant that did the work for the transfer station, storm and sanitary work not retained?

Bullet 3: The stormwater management design was not tendered out as the cost of this project was under \$25,000. Sco-Terra Consulting Group Limited was selected based on the firm's extensive experience with design and regulatory approvals for stormwater management projects related to solid waste sites and development projects of community scale. Sco-Terra Consulting Group Limited has extensive site development experience which includes expansion and remedial works for both closed and operating landfill sites. This project experience includes the implementation of new stormwater management facilities and the remediation of existing stormwater management facilities servicing landfill and other sites.

City engineering staff completed the original storm water design and application for the transfer station however the engineering department is no longer used due to their other commitments. Another consultant firm was used for the amendment required for the fuelling station however that consultant was selected by the Contractor who was awarded that project.

Can you provide details to the wording in 1.1 "to serve municipalities and businesses of the Province of Ontario"? Is it the intent that anyone from the Province of Ontario could bring their waste to the public drop off area for disposal?

Bullet 4: This is the exact wording taken from the original and current Waste ECA. Waste can be accepted at the site from anywhere in Ontario. This is a standard clause for most landfills and transfer stations in Ontario.

The first paragraph in Section 1.2 of the report references a 1.56-ha tract of impervious surface, while the second paragraph references a 3.50-ha PDO area. The first paragraph in Section 1.4 of the report references a 1.35-ha of impervious surface and the second bullet on page 7 references a 1.36-ha impervious paved area. Please confirm the correct areas.

Bullet 5: The 3.50 hectare PDO site is in reference to the total footprint, including the attenuation berm and landscaped areas south of the paved PDO surface. The developed and largely impervious portion of the PDO is 1.56 hectares. A limited portion (0.21 hectares) of this area including truck access and landscaped slopes drains west to the existing stormwater system proximal to the Maturation Facility. Therefore, the net PDO impervious area contributing runoff to proposed stormwater management works is 1.35 hectares.

Was there a business plan put in place for this project and if so, what did it state?

Bullet 6: A business plan was completed and indicated that constructing a new public drop off area at the Waste Resource Innovation Centre will reduce greenhouse gas emissions as well as improving customer service for residents using the site to drop off their recyclables and waste. The new public drop off design will solve the current problems of wait times for residents, traffic flow, Health and Safety concerns with having larger, industrial sized vehicles operating in a close vicinity with smaller public vehicles and the subjectivity of flat rates. The added space will also allow City staff to easily implement new recycling programs as they arise, resulting in greater diversion of waste and associated cost-benefits to Corporation.

Has this project been reviewed for compliance with the City of Guelph Source Protection Plan Policies and if so is that report available and if not, why not as this site is a vulnerable area and significant threat to drinking water according to the Grand River Source Protection Plan.

Bullet 7: In reference to the “Grand River Source Protection Area – Approved Assessment Report”, the PLC’s attention is drawn to Table 8-11: Drinking Water Quality Threats, “An activity that reduces the recharge of an aquifer” is noted (item 20). Given the proposed use and containment of stormwater within the PDO publically accessible area, and the nature of the stormwater runoff expected to be generated, the application of LID methods (i.e. soft BMP measures) is considered appropriate, complimented by upstream structural pre-treatment measures (i.e. OGS). This approach is also consistent with the City of Guelph’s Stormwater Management Master Plan.

The PLC’s prior encouragement of groundwater recharge initiatives has also been considered in the development of the Stormwater Management Plan and strategies for the PDO and TS sites.

Can you provide additional details relating to the sound-noise-visual attenuation berm, such as vegetation etc... Does Sco-Terra Consulting have any design experience with sound-noise-visual attenuation berms that they can provide or will the design and specifications be provided by others with calculations and specific references to the ability of the berm to maximise the sound-noise-visual attenuation? What design criteria has or will be used to ensure that the barrier will meet or exceed the expectations of the residential neighbourhood to the south? Effective noise barriers typically reduce noise levels by 5 to 10 decibels and to effectively reduce the noise from coming around its ends, a barrier should be at least eight times as long as the distance from the home or receiver to the barrier, can it be verified that this criteria has been met and if not, how many times as long is the distance proposed and can it be increased? What specific guideline and calculation methodologies are or will be used in the design of the barrier.

Bullet 8: The design of the Landscaped Berm Attenuation Buffer has been undertaken with respect for adjacent land uses, including residential and other land uses located south of the WRIC site (i.e. south of Stone Road). A sound attenuation study has not been undertaken and is considered unnecessary.

Can you provide additional, specific details regarding the unnamed watercourse that is referenced and how it is required to be protected and how specifically that protection is proposed?

Bullet 9: The unnamed watercourse is understood to originate south of the Guelph Airport. As it is tributary ultimately to the Eramosa River, Enhanced Protection (> 80% TSS removal) Water Quality “at-source” treatment measures are proposed in relation to the PDO and remedial works planned for the existing Transfer Station site.

The purpose of directing stormwater runoff generated from the rear of the existing waste transfer building to the sanitary sewer system, was to ensure that any contaminated runoff resulting from the material(s) being delivered to the site, was directed to the sanitary system and not the existing stormwater management facility. The disconnection of the storm sewers at the rear of the existing waste transfer building from the sanitary sewer system is not recommended.

Bullet 10: Stormwater (or floor) runoff associated with materials being delivered to the Transfer Station will continue to be directed to the transfer station floor drains and a dedicated OGS unit discharging to the City’s sanitary system. The quantum of runoff generated in association with materials delivered to the transfer station is expected to be insignificant.

The proposed separation of stormwater generated within the paved area south of the Transfer Station, and redirection of this stormwater to the existing Transfer Station dry pond, with provision to by-pass to sanitary pump station, is in accordance with Provincial and City Guidelines. The current practice of discharging substantial peak runoff and volumes of stormwater to the sanitary system under wet weather events, compromises the capacity of the City’s sanitary collection, conveyance and treatment facilities. The re-direction of this stormwater runoff to independent “at-source” treatment and existing end-of-pipe extended detention facilities is believed to be in the financial interests of Corporation, which is understood to be a key interest of the PLC.

The existing catch basin that is adjacent to bins 8/9 should remain connected to the existing sanitary to the north and grades should be modified so that this catch basin would pick up any spillage/contaminants from the bins. The two catch basin man holes to the north can then be diverted to the storm system if modified to suit additional concerns. This would take two thirds of the rain water currently going to the sanitary to the storm and would maintain better protection of the aquifer from the possible contamination from the public drop off bins. If additional rain water must be diverted from the sanitary, a roof structure could be placed over the drop off bins. Please note that I am against any change that would convert the sanitary catch basins to storm as this change goes against the original risk mitigation strategy.

Bullet 11: The 3 existing catch basins located south of the Transfer Station are “stormwater” catchbasins. The localized storm sewer system in this area was previously directed to sanitary based on the type of solid waste storage previously anticipated in this area. The potential use of this area for open solid waste storage will be considerably limited by the development of the new PDO and associated WD truck ingress-egress for bin placement and removal, at a relatively high frequency. The re-direction of stormwater runoff generated within this area to “at-source” treatment and end-of-pipe extended detention facilities equipped with “by-pass” provision to the City’s sanitary system, is considered appropriate.

The existing stormwater management facility was designed and constructed with emergency bypass piping to direct flows to the sanitary sewer system in the case of an adverse water quality event. The design of the proposed infiltration basin should also include for an emergency bypass system.

Bullet 12: Agreed. The design of the upstream storm sewer system includes an emergency by-pass provision to sanitary by way of the Transfer Station Dry Pond by-pass. This feature was added subsequent to circulation of the draft SWM Plan; and prior to receipt of the PLC's comments.

The existing extended detention SWM pond is lined with a geosynthetic clay liner (GCL) to prevent the infiltration of any runoff. Based on the existing groundwater system, as well as the increased potential for contamination from the public drop off area and the use of the site, the provision of an infiltration facility is not appropriate.

Bullet 13: The statement: "... increased potential for contamination from the public drop off area and the use of the site ..." is an assertion that is not defined or quantified. The use of infiltration measures with appropriate upstream stormwater quality treatment is supported for the reasons stated above, and consistent with prior PLC comments relating to water balance and groundwater recharge initiatives.

Please confirm that the proposal has been reviewed by the City of Guelph Fire Prevention office and that specifically, the additional fire hydrants, fire department access and fire extinguishers will be in place in accordance with subsection 3.2.2 and 3.2.3 of the Ontario Fire Code.

Bullet 14: The requirement for review by the City of Guelph Fire Prevention Office will be determined through the City of Guelph's Planning Division in conjunction with Site Plan Control approval pursuant to section 41 of the Planning Act. The PDO facility design has had regard for emergency vehicle access.

Please confirm that any engineered fill that may be required in or adjacent to the project will not be used from the non-native soil that was imported to the site that contains possible contaminants.

Bullet 15: Only engineered fill meeting project specifications and Ontario Provincial Standards (OPS) will be utilized for construction of the PDO facility. This precludes the use of contaminated materials.

Can the drawings be changed to include clouded areas with a revision number so that the changes and revisions made to the drawings from specific reviews such as 1. Client Changes, 2. Building Department changes, 3. MOE changes, 4. PLC Changes..... could be identified on the drawings?

Bullet 16: No.

Is a full Geotechnical Report available to the PLC for review? No geotechnical details related to the design of the infiltration facility have been provided (i.e. geotechnical investigation report, depth to groundwater, permeability/hydraulic conductivity of native soils, Guelph Permeameter Test Results for native soils, etc.)

Bullet 17: The Geotechnical Report will be included in the final PDO-TS SWM Plan submitted to the MOE in support of the ECA application. A copy of the IFA submission will be provided to the PLC.

The Wilkinson Model #25 Oil and Grit Separator does not look like it will adequately protect the environment from potential contaminants such as water salable liquids. These interceptors should be replaced with a better filter system that will catch all possible water salable contaminants or best of all, the catch basins should remain on the sanitary system.

Bullet 18: The Water Quality protection afforded by the OGS units is detailed in the final PDO-TS SWM Plan to be submitted to the MOE in support of the ECA application. Additional filtration measures provided in the first cell of the infiltration basin are also detailed in the final PDO-TS SWM Plan. A copy of the IFA submission will be provided to the PLC.

The report references that oil/grit separator units will be designed to provide enhanced (80% total suspended solids (TSS) removal). However, sizing details of the OGS units have not been provided.

Bullet 19: The Water Quality protection afforded by the OGS units is detailed in the final PDO-TS SWM Plan to be submitted to the MOE in support of the ECA application. Additional filtration measures provided in the first cell of the infiltration basin are also detailed in the final PDO-TS SWM Plan. A copy of the IFA submission will be provided to the PLC.

The OGS units have been designed to treat runoff generated during the 2 year design storm. In general, storm sewers are designed to convey the 5 year design storm event. Therefore, the OGS units should be sized to treat the 5 year design storm event.

Bullet 20: OGS unit are commonly designed for a 25mm (1 inch) water quality design event pursuant to MOE Guidelines. The Water Quality protection afforded by the OGS proposed for the PDO-TS SWM Plan exceeds this requirement based on selection of the 2 year return storm. The OGS units are also designed to treat peak runoff under a 5 year return storm, through restriction or 'over-control' of 5 year peak flows to 2 year peak flow levels, using localized surface attenuation within the PDO. This approach has the further benefit of reducing peak flows discharged to the infiltration basin, thereby optimizing its ability to infiltrate treated stormwater.

The on-site storm sewers have been sized to convey runoff generated during the 2 year design storm. In general storm sewers are designed to convey the 5 year deign storm event. Therefore, the storm sewers should be re-sized to convey the 5 year design storm.

Bullet 21: Refer to comments under bullet 20 which explain the inherent benefits to over-controlling 5 year storm peak runoff to 2 year post-development levels, for optimization of end-of-pipe SWM facility infiltration performance.

The report references that localized attenuation on paved surfaces will occur for events less frequent than a 2 year storm. Therefore, surface ponding will occur during the 5 year design storm. What is the depth of surface ponding during the 5 year design storm? What is the duration of the surface ponding during a 5 year design storm? The elimination of surface ponding during the 5 year storm should be investigated.

Bullet 22: The localized attenuation, depth of inundation and drawdown time are detailed in the final PDO-TS SWM Plan to be submitted to the MOE in support of the ECA application. Localized surface attenuation must achieve safe ingress and egress conditions in accordance with Provincial and Municipal requirements. A copy of the IFA submission will be provided to the PLC.

The fifth bullet on page 7 of the report references a bypass provision from the infiltration basin to the receiving watercourse, however no bypass system for the infiltration basin has been provided, nor has a bypass system been provided to direct runoff to the sanitary sewer system in the case of a spill and/or contamination.

Bullet 23: The by-pass referred to is a major system by-pass, wherein the extended detention capacity of the infiltration basin is exceeded. This by-pass provision (armoured spillway) is detailed on the IFR Civil Drawings previously provided to the PLC.

What is the anticipated drawdown time for the infiltration facility?

Bullet 24: The drawdown time of the infiltration basin varies under each design storm event. Stage-storage-discharge characteristics are detailed in the final PDO-TS SWM Plan to be submitted to the MOE in support of the ECA application. A copy of the IFA submission will be provided to the PLC.

Based on the site use, only “clean” runoff (i.e. runoff from rooftops and/or grassed surfaces) is recommended to be infiltrated. A method for ensuring that only “clean” runoff is infiltrated should be investigated.

Bullet 25: Stormwater runoff of suitable quality for infiltration is to be achieved through responsible operation of the PDO, provision of at-source stormwater quality pre-treatment and ‘soft’ filtration measures employed in the first cell of the infiltration basin. This approach is consistent with pre-consultation discussions with the Ministry of the Environment and the PLC’s prior concerns around water balance and groundwater recharge initiatives.

Section 3.2 identifies that thermal (temperature) treatment of runoff is required. No provision and/or discussion with respect to temperature controls and/or mitigation measures have been provided. Please provide these details.

Bullet 26: Thermal control is achieved through the infiltration and recharge of stormwater to the shallow aquifer under first flush events. Due to the pervious nature of sub-soils on a site-specific and regional basis, and observation of seasonal base flow conditions in the receiving watercourse, it is potentially a “gaining reach” which receives base flow contribution from the shallow aquifer. Infiltration versus direct surface water discharge serves to mitigate thermal impacts to this receiver, which is tributary to the Eramosa River (i.e. classified as a warm water stream with cold water rehabilitation potential).

Section 4.2 identifies that the Guelph Arboretum AES rainfall intensity-duration-frequency (IDF) has been used. The City of Guelph 5 year design storm event (Chicago distribution – 170minute duration) should be utilized.

Bullet 27: The City's current intensity-duration-frequency (IDF) parameters, as set out in the Guelph Stormwater Management Plan (AMEC, February 2012) have been utilized. These IDF parameters are derived from 16 years of rainfall data (1954-1970) from the Guelph Arboretum station. The 5 year design storm referenced is also derived from the rainfall data collected at the Guelph Arboretum station. This 5 years design storm is in fact that utilized by Sco-Terra in the PDO-TS SWM Plan.

Maintenance requirements and anticipated time line, for the proposed infiltration basin should be provided.

Bullet 28: Maintenance requirements for the infiltration basin are detailed in the final PDO-TS SWM Plan to be submitted to the MOE in support of the ECA application. A copy of the IFA submission will be provided to the PLC.

All heavy duty silt fences installed on site should be as per the City of Guelph Standard (SD-74b), not OPSD 219.13.

Bullet 29: The City of Guelph has not opposed the use of OPSD 219.13 which is the Provincial Standard for Heavy Duty Silt Fence" with wire mesh reinforcement. This specification has due regard for protection of the receiving watercourse.

Section 8.2 identifies that the infiltration basin will be inspected and monitored regularly. What is the frequency and timing of the inspections and/or monitoring?

Bullet 30: The PDO infiltration basin will be in plain view so will be monitored constantly by site staff. As per all on-site infrastructures, routine maintenance and monitoring will be done on a regular basis and as needed.

Section 8.2 identifies that any remedial actions in the event of a failure will be completed by the Contractor. What is the timeline required for the completion of any remedial actions? Who is responsible for the completion of any remedial actions after all construction has been completed?

Bullet 31: The remedial action relates to erosion and sediment control during construction. This is in reference to such potential circumstances such as a breach of perimeter silt fencing. The timeline for corrective works would be immediately upon identification by Contractor or the City's Construction Observation personnel. Once the Contractor's contractual obligations have been met and Engineering Certification has been issued, confirming that the PDO-TS stormwater management works have been implemented in accordance with the approved plans and specifications, the City will be responsible for ongoing operation and maintenance of the facilities.

Drawing 06 – How will access to the infiltration basin be provided for maintenance purposes?

Bullet 32: Maintenance access to the infiltration basin is detailed in the final PDO-TS SWM Plan to be submitted to the MOE in support of the ECA application. A copy of the IFA submission will be provided to the PLC.

Drawing 16 – The infiltration basin has been designed with 3:1 side slopes. As per the City of Guelph standards all stormwater management facilities (including infiltration facilities) are to be designed with 5:1 slopes.

Bullet 33: The infiltration basin has an active storage depth of approximately 0.55 metres (22 inches). The requirement for 5:1 side slopes pertains to safety concerns in relation to extended detention ponds (wet or dry) and other end-of-pipe SWM facilities of greater permanent pool and extended detention storage depth.

Due to the large concentration of salt found in the annual reports, increased vehicle traffic and asphalt areas proposed for the public drop off area, can the City prepare and implement a salt management plan that contains best management practices to protect the environment from the negative impacts of road salts. The management plan should cover all activities which may result in release of road salts to the environment, such as salts on roads, and disposal of snow containing road salts.

Bullet 34: You were provided with a copy of the City's Salt Management Plan on October 9th, 2012 by email.