



A Sewage Disposal Site on Agricultural Land in Woolwich Township?

Overview

- The proposal of Weber Septic/Weber Environmental Services
- Not Agricultural
- Environmental Concerns
 - Township Drinking Water
 - Soil Composition
 - Climate action plan
- Opportunities for the Township
 - Promote alternative solutions
 - Enforce zoning bylaws
- Summary



Applicant Proposal

Untreated, unfiltered human waste
Surface Spread on Prime Agricultural Land



November 14, 2023

Adjacent Property Owner
Breslau, Ontario

Dear Property Owner:

Re: Neighbour Notification of ECA Application for Proposed Hauled Sewage Site 1430 Spitzig Road

Weber Septic Service is requesting in an application to the Ministry of the Environment, Conservation and Parks (Ministry) the issuance of an Environmental Compliance Approval (ECA) for a hauled sewage disposal site at 1430 Spitzig Road Breslau, Ontario.

Hauled sewage, commonly known as septage, is the waste material removed from sewage holding tanks and septic systems. Untreated hauled sewage from holding tanks and septic tanks may be disposed of on land in accordance with an ECA issued under the *Environmental Protection Act*. The proposal is for hauled sewage from residential sources to be land applied at the site.

The proposed disposal site is for an area of approximately 25 acres on this 100-acre farm. When septage is not being applied, hay will be the crop grown in this area.

Highlights of Proposed Approval Requirements

- Prior to operations, the company develops written reporting procedures and a list of the personnel responsible at the site.
- All personnel involved in the operation are aware of the requirements of the ECA and are trained in spill prevention.
- Spills are reported to the Ministry's Spills Action Centre and the company takes appropriate action.
- The company ensures that no unnecessary off-Site effects result from the operation of this site.
- Written records are maintained in a log book

No surface spreading when the ground is frozen, ice-covered or snow covered - none in winter months.

- No surface spreading under conditions where hauled sewage may runoff or discharge from the site.
- The approval to set out a maximum spreading rate and specified distances to sensitive features.
- The usable spreading area is clearly flagged or digitally designated.
- Only hauled sewage, will be disposed of at the site.

As part of the application process, you may provide comments to the Ministry on the proposed undertaking within 15-days of receiving this letter. Please send any comments you have through email with attention to EPA Part V Director at wasteproposalcomments@ontario.ca and/or mail to:

EPA Part V Director; Client Services and Permissions Branch
Ministry of the Environment, Conservation and Parks
135 St. Clair Avenue West, Toronto, Ontario M4V 1P5

3828 Chilligo Road
Breslau, Ontario N0B 1M0

1-800-208-2641
519-648-2510

www.weberenvironmentalservices.ca
info@weberenvironmental.ca

Not Agricultural Use



- Official Plan regarding Prime Agricultural Areas (Chapter 6, pg 1):

“Uses not directly related to food production, or associated uses thereof, will be directed to locate within the Rural Settlement Areas, Rural employment Areas, Township Urban Areas, or Urban Areas”

- Applicant is a commercial corporation
- Hay? **Contamination** = no buyers

- On Farm Diversified use (Official Plan 6.2.2):

- not exceed 2% of the total size of farm
- *“does not include any use which is, or may become, obnoxious, offensive or dangerous by reasons of the presence, emission or production in any manner of odour, dust, noise, fumes, vibration, refuse matter or water carried wastes;*
- *“is not detrimental to the environment and complies with the environmental policies of Chapter 13.”*



Township's Drinking Water Contamination

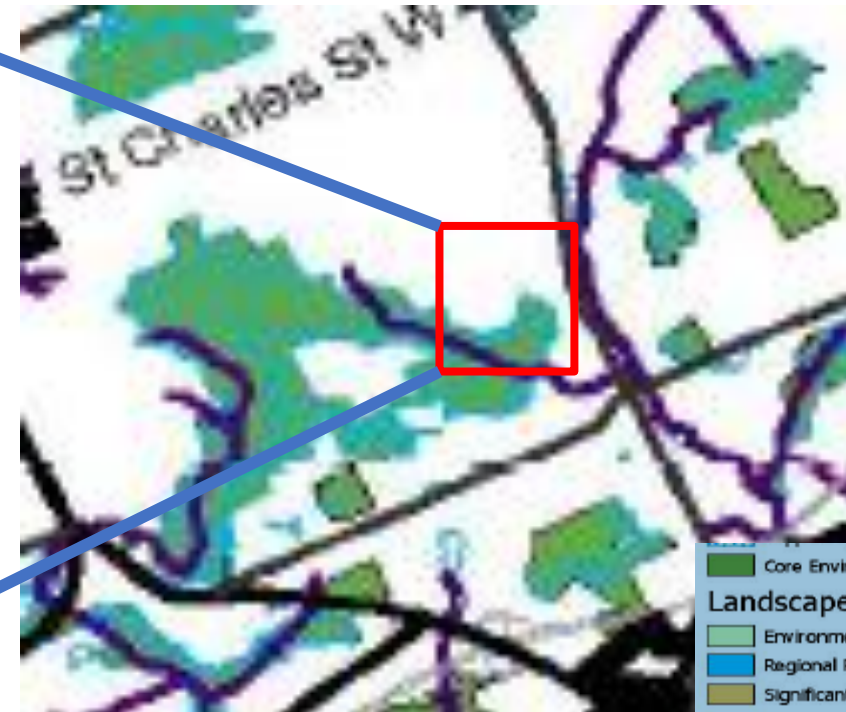
Sewage spreading site overlaps with **Well Head Protection Area-E (WHPA-E)**

- A WHPA is an area where the municipal water is particularly vulnerable to contamination



Further Contamination of Township Drinking Water

- Proximity to **Regional Recharge Areas (RRA)**
- RRAs are sites with exceptional drainage for replenishment of township's underground drinking water aquifers



Inevitable Contamination of Drinking Water

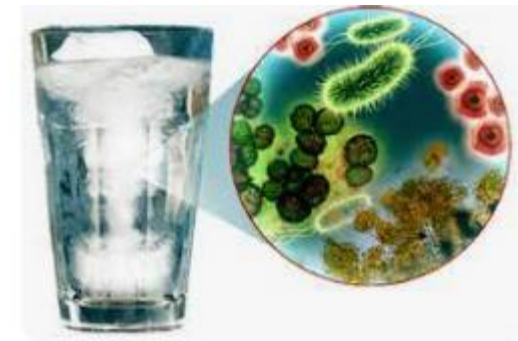
- SLOPE: significant slope toward the WHPA and RRAs
- Soil composition: ideal for draining, - a gravel pit composition



Environmental Concerns

- Contaminants of Key concern:

- Pharmaceuticals
- Personal care products
- Detergents and flame retardants
- Heavy metals (particularly from industrial plants)
- Pathogens (bacteria, viruses, protozoa, prions)
- Parasites
- Antimicrobial resistant genes
- Microplastics



- Soil Health from longterm application

- Accumulation of persistent pollutants such as microplastics and organic chemicals
- Nutrient imbalances (high phosphorous and low potassium) can become a major issue
- Phosphate enrichment can cause wider environmental risk

- Habitat for endangered species

- Proposal is in direct conflict to the Township's official climate action plan which includes:

“Promoting local food, food security, and soil health, and protecting the agricultural land base”.

Environmental Concerns

- Odour:
 - Extremely windy location on relatively high elevation
 - Prevailing direction west to east (towards Maryhill)
- Windborne pathogens:
 - Infection risk is significant within 10km from fields where sludge is spread
 - Risk even higher than study indicates because biosolids are treated to reduce pathogen load
 - Risk even higher in Canada, due to the cooler and wetter climate



Zoning and Regulatory Issues



- Zoning bylaw
 - Cannot be an Industrial “On-Farm Diversified Use” as it is the primary use of the farm with hay being an untenable secondary use
 - Under bylaw 6.22.12, the proposal would also be prohibited: *“a use which is or may become offensive or dangerous by reasons of the presence, emission, or production in any manner of odour, dust, smoke, noise, fumes, vibration, refuse matter, water carried wastes or traffic is specifically prohibited”*
- OMAFRA regulates material that can be spread on agricultural lands
 - Agricultural Source Material (ASM)
 - Non Agricultural Source Material (NASM)
 - **Untreated** human waste is an **industrial** source materials
- IF permissible
 - Accessory storage containers must be constructed of solid concrete material, not “frac tanks”
 - The storage containers must be greater than 300 meters from a residence which they are not

The image shows a close-up of a brick building facade. The words "TOWNSHIP OF WOOLWICH" are mounted on the wall in a curved, raised font. Below the text is the official coat of arms of the township, which features a shield with a blue and white striped top section, a yellow banner across the middle, and a white bottom section with a green field. The building has a series of windows with white frames along the top edge.

TOWNSHIP OF WOOLWICH

Opportunities for the Township

Opportunities for the Township



Municipal Consultation

- Applicable by-laws
- Proper zoning: **no**
- Compliance with Official Plan: **incompatible**
- Impacts on sources of drinking water: **very concerning**

← ↻ 🔒 <https://www.ontario.ca/page/environmental-compliance-approval> A

The ECA process

Before you apply

You may need to satisfy other federal, municipal or provincial requirements before you can apply for an ECA. As part of your project planning and before you prepare the technical aspects of your application, you should:

- Review the [environmental land use planning guides](#) which outline the environmental considerations and requirements for industrial land use, sensitive lands, sewage and water services, and private wells.
- Review the [federal guidance related to environment and natural resources](#) to identify if any federal requirements that apply to your project and determine the appropriate timeframe to satisfy the requirement(s).

- **Consult with the municipality** to ensure that you understand applicable by-laws, proper zoning is in place and that the activity is permitted under the municipality's official plan.

- **Consider the impacts on sources of drinking water.** Learn more about [Source Water Protection](#) if the proposed activity is for sewage works or a waste disposal site.

- **Determine if your project is subject to an Environmental Assessment and complete the process as required.** [Learn more about which sectors and projects are subject to the Environmental Assessment process.](#)

Opportunities for the Township

- Write a letter to MECP
- Give notice to Applicant
- Champion the Official Plan and propose viable alternative solutions:
 - Dispose at Region of Waterloo's Award-winning, environmentally-friendly wastewater treatment technology
 - Overseen by the Ontario Clean Water Agency
 - Accepting of sanitary discharges from pre-approved licensed commercial haulers that clean out privately owned residential septic tanks and portable toilets

THIS



Or

THAT



Summary

- The Applicant's proposal to convert Prime Agricultural Lands to an industrial landfill site for untreated human sewage landfill is untenable:
 - Conflicts with the Official Plan of the Township regarding Prime Agricultural Lands
 - Conflicts with the Official Plan of the Township regarding Environmental Policies and the Climate Action Plan
 - Conflicts with the zoning bylaws for Agricultural Land
 - Significant environmental concerns:
 - Jeopardizes Township drinking water
 - Compromises soil health
 - Depletes agricultural land base
 - Air pollution and malodours
- Local, viable, environmentally-sustainable and environmentally protective alternatives exist
- Thank you

Wildlife on the proposed sewage landfill site

